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February 24, 2026

VIA eFILING

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

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

Dear Secretary Homsher:

Enclosed for filing is the **Joint Petition for Settlement** ("Joint Petition") in the above-referenced matter.

As indicated on the Certificate of Service, copies of the Joint Petition have been served upon Administrative Law Judge Marta Guhl and all parties of record.

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

Very truly yours,

A handwritten signature in black ink that reads "Anthony E. Gay". The signature is written in a cursive, flowing style.

Anthony E. Gay

Enclosures

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this date served true and correct copies of the foregoing **Joint Petition for Settlement** on the following individuals in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: February 24, 2026

Counsel for PECO Energy Company

**BEFORE THE
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JOINT PETITION FOR SETTLEMENT

February 24, 2026

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EXHIBITS AND STATEMENTS IN SUPPORT

Exhibit 1	Revised PECO Act 129 Phase V Energy Efficiency and Conservation Plan (Program Years 18-22) (clean and redline)
Exhibit 2	Comparison of Original and Revised Plan Design for Comprehensive Low-Income Measure Incentive Spending
Statement A	Statement in Support of Joint Petition for Settlement of PECO Energy Company
Statement B	Statement in Support of Joint Petition for Settlement of the Office of Consumer Advocate
Statement C	Statement in Support of Joint Petition for Settlement of the Office of Small Business Advocate
Statement D	Statement in Support of Joint Petition for Settlement of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania and the Tenant Union Representative Network
Statement E	Statement in Support of Joint Petition for Settlement of the Philadelphia Area Industrial Energy Users Group
Statement F	Statement in Support of Joint Petition for Settlement of the City of Philadelphia and the Philadelphia Energy Authority
Statement G	Statement in Support of Joint Petition for Settlement of the Keystone Energy Efficiency Alliance

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PETITION OF PECO ENERGY	:	
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JOINT PETITION FOR SETTLEMENT

TO THE HONORABLE MARTA GUHL, ADMINISTRATIVE LAW JUDGE:

PECO Energy Company (“PECO” or the “Company”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Tenant Union Representative Network (“TURN”), the Philadelphia Area Industrial Energy Users Group (“PAIEUG”), the City of Philadelphia and Philadelphia Energy Authority (“City/PEA”) and the Keystone Energy Efficiency Alliance (“KEEA”) (collectively, the “Joint Petitioners”), by their respective counsel, submit this Joint Petition for Settlement (the “Settlement”) in the above-captioned proceeding and request that the Pennsylvania Public Utility Commission (the “Commission”) approve the Settlement without modification. In support of this Settlement, the Joint Petitioners state as follows:

I. BACKGROUND

1. On December 1, 2025, PECO petitioned the Commission for approval of the Company’s Phase V Energy Efficiency and Conservation Plan (the “Phase V Plan” or “Plan”) to achieve energy and demand savings in accordance with the requirements of Act 129 of 2008, 66 Pa.C.S. § 2806.1 (“Act 129”), and the Commission’s Implementation Order entered June 18, 2025, at Docket No. M-2025- 3052826 (the “*Phase V Implementation Order*”). PECO requested in its

Petition that the Commission: (1) find that the Phase V Plan satisfies the requirements of 66 Pa.C.S. § 2806.1(b)(1) and the *Phase V Implementation Order*, including those provisions mandating the implementation of programs designed to achieve the peak demand reduction and consumption reduction targets established for PECO and the energy savings carveout for the low-income customer sector; and (2) approve a supplement to PECO's Electric Service Tariff to implement a Section 1307 surcharge to recover Phase V Plan costs.

2. PECO filed with its Petition the direct testimony and exhibits of Urmila Dighe (PECO Statement No. 1), Marina Geneles (PECO Statement No. 2), Mark van Eeghen (PECO Statement No. 3) and Megan A. McDevitt (PECO Statement No. 4).

3. On December 2, 2025, CAUSE-PA filed a Petition to Intervene and Answer and TURN filed a Petition to Intervene. On December 4, 2025, OSBA filed a Notice of Appearance and on December 19, 2025, filed a Notice of Intervention, Public Statement, and Verification. On December 5, 2025, OCA filed a Notice of Appearance and on December 9, 2025, a Notice of Intervention and Public Statement. On December 18, 2025, PAIEUG filed a Petition to Intervene. On December 26, 2025, the City/PEA filed a Petition to Intervene. Finally, on January 6, 2026, KEEA filed a Petition to Intervene and Answer.

4. This case was assigned to The Honorable Marta Guhl, Administrative Law Judge (the "ALJ"), and a Prehearing Conference was held on January 5, 2026. Subsequent to the Prehearing Conference, the parties developed a consensus procedural schedule that was accepted by the ALJ on January 8, 2026. PECO also submitted a Motion for Protective Order on January 8, 2026, which the ALJ granted on January 22, 2026.

5. Pursuant to the established litigation schedule, direct testimony was submitted by the OCA, CAUSE-PA/TURN, KEEA and the City/PEA on January 20, 2026, and rebuttal testimony was submitted by PECO and OSBA on January 30, 2026.

6. An evidentiary hearing was held telephonically on February 2, 2026. All parties waived cross-examination of other party witnesses. At the hearing, all pre-filed testimony was admitted into evidence.

7. The parties engaged in discussions to negotiate a settlement of some or all the issues in this case. As a result of those negotiations, the Joint Petitioners agreed to the Settlement set forth herein, which resolves all issues in this proceeding.

8. On February 10, 2026, PECO notified the ALJ that a complete settlement had been achieved, and the ALJ thereafter granted PECO's request to establish a filing date of February 24, 2026, for the Joint Petition, Statements in Support, and revised Phase V Plan.

II. TERMS AND CONDITIONS OF SETTLEMENT

9. The Joint Petitioners have agreed to the following Settlement terms and conditions which are reflected, as appropriate, in the revised Phase V Plan (Exhibit 1)¹ attached to this Joint Petition:

10. PECO's Section 1307 surcharge to recover Phase V Plan costs shall be consistent with PECO Exhibit MAM-1.

¹ In addition to reflecting the Settlement terms and conditions, the revised Phase V Plan includes some limited additional clarifications, corrections and updates.

A. Comprehensiveness / Deeper Savings

11. PECO will revise Table 8 and Table 20 in the Plan to reflect the measures identified in the residential comprehensive measure list issued by the Commission in their Phase V plan template tables (the “Comprehensive Measure List”).²

12. PECO will reduce the share of non-residential savings attributed to lighting measures from approximately 44 percent to approximately 40 percent and reallocate funds related to that reduction to non-lighting strategies within the Non-Residential Program.

13. PECO will adjust the Plan design to increase the low-income comprehensive measure spending by \$2 million (to \$17.7 million total) by reallocating funds from non-comprehensive measures.³ Low-income comprehensive measures are measures identified on the Comprehensive Measure List.

14. Within 180 days of the start of Phase V, PECO will draft a program strategy document outlining its approach to promoting projects that include two or more comprehensive measures for installation. PECO will share the strategy and approach with parties during a biannual stakeholder update meeting. PECO will share the program strategy document and gather input from stakeholders at the meeting to help inform PECO’s program strategy.

15. The Company will implement the non-low-income Home Energy Reports (“HER”) program consistent with the savings, participation levels, and portfolio proposed in the PECO Phase V Plan filing. Outreach for the non-low-income HER program will leverage usage-based targeting approaches, including identification of customers with higher electricity usage.

² See Table 8 Addendum of the Plan Template Tables Workbook (<https://www.puc.pa.gov/pcdocs/1894161.xlsx>).

³ See Joint Petition Exhibit 2 for a comparison of the original and revised Plan design for comprehensive low-income measure incentive spending.

The Company's non-low-income HER Program spending will not exceed \$13,989,000 as set forth in the filed Plan on December 1, 2025. PECO will enhance HER recommendations to emphasize comprehensive energy efficiency measures with longer measure lives. This will include targeted messaging related to building envelope improvements, heating and cooling upgrades, and participation in other Act 129 programs offering deeper savings opportunities, including the availability of low-income Act 129 programs.

B. Low-Income Sector

16. Within 180 days of the start of Phase V, PECO will incorporate energy efficiency education into existing Customer Assistance Program ("CAP") outreach events to generate awareness about Act 129 and other PECO assistance programs.

17. The Company will not count savings generated by the Low-Income HER program towards the Phase V low-income carveout.

18. For the Appliance Recycling component of the low-income subprogram, PECO will develop targeted messaging to low-income customers to drive participation at drop-off events and pick-up events (if a suitable vendor is obtained to provide pick-up services). For customers that participate, PECO will inform confirmed low-income customers about the availability and benefits of a Free Energy Check-Up and will facilitate audit scheduling for customers who affirmatively opt in. PECO will develop and implement targeted marketing for the Appliance Recycling component of the low-income subprogram. All print and/or email marketing materials for the appliance recycling component of the low-income subprogram will include information about both Appliance Recycling and examples of the no-cost measures available through the Free Energy Check-Up. Copies of these marketing materials will be provided to the other Joint Petitioners when finalized and no later than 180 days after the start of Phase V. The Company

will tailor messaging for low-income customers to highlight the benefits of energy assessments and potential energy efficiency measures, subject to the unique characteristics of the home. PECO will count savings generated by the Appliance Recycling component of the low-income subprogram towards the Phase V low-income carveout.

19. Within 180 days of the start of Phase V, PECO will add information to the existing CAP Maximum Credit Notification letters sent to CAP customers about how customers can access PECO's website to obtain information regarding Act 129 energy efficiency measures available to low-income customers. PECO further agrees to coordinate with Community-Based Organizations in PECO's service territory to provide training and materials regarding Act 129 low-income program offerings.

20. PECO will track electric resistance heating customers from low-income Free Energy Check-Up visits and will provide materials, once finalized, about the benefits of the opportunities available to them to move away from electric resistance heating to heat pumps during Act 129 audits. PECO will provide a copy of the materials with the parties to this proceeding when finalized and no later than 180 days after the start of Phase V. When an Act 129 auditor identifies a residential or low-income customer who is potentially eligible for Rate RH, in accordance with PECO's Tariff, the technician will provide that customer with information about specific requirements for switching to Rate RH.

21. PECO agrees to include in its Act 129 Final Annual Report data that contains, disaggregated by CAP customers with electric heating and those without electric heating, and as identified during an Act 129 audit:

- (a) the number of CAP customers who received an Act 129 audit, including any LIURP audit where Act 129 measures are installed;
- (b) the number of customers who received any Act 129 measures following the audit; and

- (c) the number of customers who received comprehensive measures following the audit.

22. PECO will not impose a standard per-household cap on health and safety spending for its Act 129 program in Phase V. Rather, PECO will assess health and safety needs on an individual basis while considering the available Phase V Health and Safety budget.

C. Coordination, Tracking and Data Collection, Data Sharing and Stakeholder Engagement

23. Within 180 days of the start of Phase V, PECO shall designate at least one staff-level coordination lead (the “Coordination Lead”) responsible for maintaining coordination and referrals with external home repair, weatherization, and energy efficiency programs operating in PECO’s service territory, including but not limited to the Philadelphia Housing Development Corporation, Philadelphia Energy Authority, any other agencies implementing the City of Philadelphia HOME plan, and weatherization/home repair agencies in PECO’s service territory (collectively, the “Act 129 Coordination Partners”). PECO shall provide all parties to this proceeding with the name and contact information of this Coordination Lead. The Coordination Lead shall also serve as the point of contact for other non-profit or governmental housing, legal, and direct service providers operating in PECO’s service territory (the “Service Providers”) for questions regarding Act 129 services for low-income residents whom the Service Providers are assisting.

24. Within 180 days of the start of Phase V, PECO shall establish a written coordination framework governing interactions between PECO’s residential and low-income Act 129 programs (as managed through PECO’s Conservation Service Providers (“CSPs”)), the Act 129 Coordination Partners, and the Service Providers. The framework shall, at a minimum, address: data sharing (both method and types of data), customer privacy, communication and follow-up protocols, coordination within the Act 129 framework or sequencing of Act 129 and

external program measure implementation with consideration given to the number of provider visits to enter a customer home, opportunities to braid funding sources, dispute resolution protocols, discussion of other potentially applicable external programs, and a pathway for negotiated agreements between PECO and Act 129 Coordination Partners.

25. Within 75 days of the start of Phase V, PECO will convene a coordination collaborative with interested parties to this proceeding, Act 129 Coordination Partners, and other individuals on PECO's distribution list for Act 129 biannual meetings to gather input on the issues to be addressed in the coordination framework.

26. At least 45 days prior to finalizing its coordination framework, PECO will provide the parties to this proceeding, the Act 129 Coordination Partners, and PECO's distribution list for Act 129 biannual meetings with a draft of this coordination framework, and will also convene a second coordination collaborative to provide an overview and answer questions about the draft. Following this collaborative, PECO will provide the opportunity to provide written feedback on the draft within 21 days after distribution of the draft. PECO will consider incorporating feedback and recommendations in good faith.

27. Upon implementation of the coordination framework, PECO shall track the following coordination metrics for Act 129 Coordination Partners:

- (a) the number of referrals received;
- (b) the number of referrals with completed Act 129 measures;
- (c) the types of Act 129 measures installed for referred customers; and
- (d) the number of customers referred to other programs through Act 129.

PECO shall provide this data at its biannual stakeholder meetings and include such data in its annual reports to the Commission.

28. Within 60 days of the Commission's Data Sharing Working Group issuing any final recommendations or proposals, the Company shall convene a meeting of interested Joint Petitioners to explain whether PECO will be adopting those recommendations or proposals. If PECO does not adopt a particular recommendation or proposal, PECO will explain its reasoning at that meeting.

29. PECO shall reserve time on the agenda during the biannual stakeholder meetings to discuss coordination efforts with organizations implementing home repair, weatherization, and energy efficiency programs in PECO's service territory, as well as with any interested parties to this proceeding. These stakeholder agenda items may include:

- (a) evaluating the effectiveness of the coordination framework;
- (b) identifying barriers to coordinated delivery;
- (c) proposing improvements to coordination practices; and/or
- (d) implementation of recommendations from the Commission's Data Sharing Working Group

PECO shall consider program changes identified in these meetings.

D. Low-to-Moderate Income and Multi-Family Sectors

30. PECO will dedicate \$1 million from its total Plan Residential Research and Development budget to a low- to moderate-income pilot, targeting energy efficiency opportunities within that specific customer segment (151%-250% of the Federal Poverty Level). PECO will identify and track implementation of comprehensive efficiency measures to these customers while advancing its overall energy savings goals. The pilot term will be up to 24 months. Once the pilot results have been analyzed, the Company will present pilot findings to PECO Act 129 stakeholders and discuss any recommended changes to energy efficiency offerings in PECO's Phase V Plan because of the pilot findings, including consideration of expanding the pilot and funding for the

targeted customer group if the pilot demonstrates positive performance and there is available budget in the program.

31. To facilitate the specific targeting of multi-family properties and future Act 129 EE&C marketing strategies of that customer segment, PECO will require CSPs to collect multi-family housing information while implementing Phase V programs. PECO will track multi-family participation and savings by measure, program, and income segment (low-income and non-low income), where feasible. The Company will develop a data repository and summarize findings at the biannual Act 129 EE&C stakeholder meetings.

E. Additional Enhancements

32. PECO will continue to actively participate in the ongoing Act 129 Data Sharing Working Group established by the Commission and work with stakeholders to arrive at a common strategy and process for Phase V.

33. PECO will continue collaboration opportunities with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters. PECO will reach out to the Energy Coordinating Agency and any other existing programs in PECO's service territory that provide heat pump training to provide an opportunity to include them in any discussions.

34. PECO will share information about Act 129 residential customer outreach activities at the biannual EE&C stakeholder meetings, including information from residential customer surveys conducted through Evaluation Measurement & Verification process activities.

35. Within 180 days of the start of Phase V, PECO shall develop, implement, and maintain a formal process to ensure that all customers and prospective customers seeking interconnection with the Company are informed of available Commission-approved Act 129 programs. This obligation shall include, at a minimum, residential new construction builders, data

centers, and other commercial or industrial (“C&I”) customers. PECO shall include in their biannual stakeholder meetings a report out of the processes implemented to inform interconnection applicants of Act 129 programs, including any communication methods and updates or improvements.

36. PECO will reserve an hour at the conclusion of a biannual stakeholder meeting for the interested parties to stay and discuss potential residential and C&I daily load shifting opportunities, pilot program concepts and relevant market developments.

37. PECO will include participation information about the C&I Load Shifting measure in PECO’s Act 129 Final Annual Report.

III. THE SETTLEMENT IS IN THE PUBLIC INTEREST

38. PECO, OCA, OSBA, CAUSE-PA, TURN, PAIEUG, City/PEA and KEEA have prepared, and attached to this Settlement, Statements in Support identified as Statements A through G, respectively, setting forth the bases on which they believe the Settlement is in the public interest.

39. The Joint Petitioners submit that the Settlement is in the public interest for the following additional reasons:

- The Settlement amicably and expeditiously resolves a number of important and contentious issues. The administrative burden and costs to litigate these matters to conclusion would otherwise be significant; and
- The Joint Petitioners arrived at the Settlement terms after conducting discovery and having in-depth discussions over several weeks. The Settlement terms and conditions constitute a carefully crafted package representing reasonable negotiated compromises on the issues addressed herein. Thus, the Settlement is consistent with the Commission’s rules and practices encouraging negotiated settlements (*see* 52 Pa. Code §§ 5.231 and 69.391) and is supported by substantial record evidence.

IV. ADDITIONAL TERMS AND CONDITIONS

40. This Settlement is conditioned upon the Commission's approval of the terms and conditions contained herein without modification. If the Commission modifies the Settlement, then any Joint Petitioner may elect to withdraw from this Settlement and may proceed with litigation and, in such event, this Settlement shall be void and of no effect. Such election to withdraw must be made in writing, filed with the Secretary of the Commission and served upon all Joint Petitioners within five (5) business days after the entry of an order modifying the Settlement. The Joint Petitioners acknowledge and agree that this Settlement, if approved, shall have the same force and effect as if the Joint Petitioners had fully litigated this proceeding.

41. This Settlement is proposed by the Joint Petitioners to settle certain issues in the instant proceeding. If the Commission does not approve the Settlement and the proceedings continue to further hearings, the Joint Petitioners reserve their respective rights to present additional testimony and to conduct full cross-examination, briefing, and argument. The Settlement is made without any admission against, or prejudice to, any position which any Joint Petitioner may adopt in the event of any subsequent litigation of this proceeding.

42. This Settlement may not be cited as precedent in any future proceeding, except to the extent required to implement this Settlement.

43. This Settlement is being presented only in the context of this proceeding in an effort to resolve the proceeding in a manner which is fair and reasonable. The Settlement is the product of compromise. This Settlement is presented without prejudice to any position which any of the Joint Petitioners may have advanced and without prejudice to the position any of the Joint Petitioners may advance in the future on the merits of the issues in future proceedings except to the extent necessary to effectuate the terms and conditions of this Settlement. This Settlement

does not preclude the Joint Petitioners from taking other positions in proceedings of other public utilities.

44. If the presiding administrative law judge adopts the Settlement without modification, the Joint Petitioners waive their rights to file Exceptions.

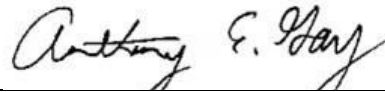
45. Each term and condition set forth in this Settlement, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.

46. Unless otherwise expressly indicated, and subject to the Commission's continuing jurisdiction, all terms and conditions contained herein shall take effect upon issuance of a final order in this proceeding. However, if a subsequent Commission order, directive, or decision in this or any other docket materially affects or is inconsistent with this Settlement, the Company shall notify the parties if it believes an additional filing with the Commission is necessary to effectuate the provisions of this Settlement.

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WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that the Pennsylvania Public Utility Commission enter an Order approving the Joint Petition for Settlement as set forth herein, including all terms and conditions thereof.

Respectfully submitted,



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EXHIBIT 1
(CLEAN)

PECO Program Years 18 to 22

Act 129 – Phase V Energy Efficiency and Conservation Plan

Submitted to:



Pennsylvania Public Utility Commission

Submitted by:



February 24, 2026

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Table of Acronyms

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

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

Mapping of Program Years to Dates

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

1. Overview of Plan

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

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

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

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

Figure 1. PECO's Phase V Program Structure, Savings, and Budget^{1,2}



1.1 Summary Description of Plan, Objectives, and Overall Strategy

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

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

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

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

² Compliance for peak demand reductions are measured at the system level and compliance for energy savings are measured at the meter level per the Phase V Final Implementation Order. Peak demand reductions shown in this figure and throughout the filing are at the system level, whereas energy savings are shown at the meter level.

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

The EE&C Plan objectives include:

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

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

Key features of PECO's Plan include:

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

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

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

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

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

1. **Program Structure and CSP Framework:** PECO first established the overall program architecture, including defining the payment structure for CSPs and outlining expectations for program development, implementation, and performance metric tracking. This framework allowed for consistency across delivery channels while allowing flexibility for CSP innovation.
2. **Integration of Regulatory and Market Data:** To inform program budgets, plan savings targets, and design parameters, PECO referenced the 2026 TRM to inform savings calculations,³ the Pennsylvania Statewide Evaluator (“SWE”) Baseline⁴ and Potential Studies⁵ to determine plan savings targets and budget by program, the Phase V Tentative⁶ and Final⁷ Implementation Orders to identify specific regulatory requirements to incorporate into the Scope of Work, and the lessons learned from the Phase IV evaluation and research to address customer needs and improve program effectiveness.
3. **Scope of Work and Competitive Bidding:** PECO issued an RFI on March 5, 2025, to engage the market and to identify innovative implementation approaches. PECO developed a detailed scope of work to specify program design elements, performance requirements, and compliance obligations. PECO then initiated a competitive RFP process,⁸ inviting CSPs to submit proposals that met these criteria and aligned with Phase V objectives.

³ Pennsylvania Statewide Act 129 2026 TRM, September 2024, [2026 Technical Reference Manual Final Order](#).

⁴ 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, February 2023, [2023 Residential Baseline Study](#), 2023 Non-Residential Baseline Study, February 2023, [2023 Non-Residential Baseline Study](#).

⁵ Pennsylvania Act 129 - Phase V Energy Efficiency and Peak Demand Reduction Market Potential Study Report, February 2023, [Phase V Energy Efficiency and Peak Demand Reduction Potential Study Report](#)

Phase V Demand Response Potential Study, February 2025, [Phase V Demand Response Potential Study Report](#).

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

⁷ [Phase V Final Implementation Order](#) – The Act 129 Phase V EE&C Program Implementation Order, From the Public Meeting of June 2025, Docket No. M-2025-3052826.

⁸ The RFP for the Residential HER Program was issued by Exelon for support to all Exelon Operating Companies.

Key elements of the CSP Scope of Work include:

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

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

- **Budget development:** CSPs defined total program component budgets, given the constraints outlined from PECO's modeling efforts, specifying allocations between customer incentives and CSP delivery costs. PECO emphasized maximizing incentive budgets to drive participation and deliver greater benefits to ratepayers;
- **Program implementation plans:** PECO required CSPs to adopt a rigorous approach informed by regulatory and market data. CSPs reviewed the Phase V Final Order and the SWE Potential Studies to align program strategies with statewide objectives;
- **Program structure and delivery components:** CSPs proposed detailed program architecture, delivery mechanisms, and eligible measure portfolios that leverage historical PECO participation and savings data, evaluation reports from prior years, and direct input from market actors; and
- **Savings calibration and forecasting:** CSPs calibrated savings estimates to the 2026 Technical Reference Manual ("TRM") and developed forward-looking adoption forecasts for each measure through 2031.

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

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

on feedback. All marketing materials must be PECO-approved, accessible, and designed to maximize program participation, drive energy and demand savings, and support customers throughout their engagement with the programs.

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

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

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

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

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

Table 1. Summary of PECO’s Phase V Plan: Portfolio Lifetime Costs and Benefits⁹

Sector	Total Discounted Lifetime Costs (\$000) ¹⁰	Total Discounted Lifetime Benefits (\$000)	Present Value of Net Benefits (\$000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low- Income)	\$343,374	\$312,339	-\$31,035	0.9
Residential Low- Income	\$54,379	\$67,170	\$12,790	1.2
Small Commercial & Industrial	\$316,397	\$412,893	\$96,496	1.3
Large Commercial & Industrial	\$387,473	\$540,583	\$153,109	1.4
Total Portfolio	\$1,101,623	\$1,332,984	\$231,361	1.2

⁹ In this and subsequent tables, unless otherwise noted, SCI and LCI totals include the Municipal Lighting sector

¹⁰ Lifetime costs and benefits have all been discounted to PY18

Table 2 summarizes portfolio energy savings using Act 129 accounting conventions. Reported values reflect incremental annual savings achieved within the program year, which are weather normalized to account for variations in heating and cooling loads. Savings are presented at both the meter level, representing customer-side impacts, and the system level, which adjusts for transmission and distribution losses.

Additionally, results are shown as gross savings prior to adjustments for free ridership and spillover. These distinctions support consistency with Act 129 protocols and provide a transparent basis for compliance and cost-effectiveness evaluation.

Table 2. Summary of PECO's Phase V Plan: Summary of Portfolio Energy Savings¹¹

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	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	1st-Year MWh	Lifetime MWh
Baseline	39,386,000		39,386,000		39,386,000		39,386,000		39,386,000		39,386,000	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	63,486	537,232	81,204	656,016	80,879	733,524	91,739	855,617	67,262	578,061	384,569	3,360,450
Residential Low-Income Sub-Sector – Projected Incremental Savings ¹²	14,527	92,487	13,839	90,100	14,321	92,736	14,432	93,536	11,853	78,976	68,972	447,834
SCI Sector – Projected Incremental Savings	74,481	1,103,833	93,529	1,385,718	96,060	1,421,471	107,098	1,291,767	66,038	975,336	437,207	6,178,125
LCI Sector – Projected Incremental Savings	75,056	1,113,583	106,885	1,590,240	123,126	1,832,449	147,554	1,902,768	106,242	1,581,770	558,864	8,020,810
EE&C Plan Total – Projected Incremental Savings	227,550	2,847,135	295,457	3,722,074	314,386	4,080,180	360,824	4,143,688	251,395	3,214,143	1,449,612	18,007,220
EE&C Plan Total – Projected Cumulative Savings	227,550	2,847,135	523,007	6,569,209	837,393	10,649,389	1,198,217	14,793,077	1,449,612	18,007,220	1,449,612	18,007,220
EE&C Plan Total – Percentage of Target to be Met	20%		47%		75%		108%		130%		130%	
Estimated Phase IV Carryover Savings ¹³											171,867	
Total Cumulative Projected Savings Phase V + Estimated	399,417		694,874		1,009,260		1,370,084		1,621,479		1,621,479	

¹¹ SCI Sector and LCI Sector totals include street lighting measures which may be a part of the Municipal Lighting sector

¹² Costs for master-metered projects are recovered from the Small and Large C&I sectors. Low-income master-metered buildings are recovered from of the Small and Large C&I sectors and are counted towards the low income carveout target.

¹³ Phase IV carryover savings were estimated using the phase-to-date verified totals from the PY16 SWE Report and PECO's PY17 Q1 reported savings values extrapolated over a full program year.

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh	Lifetime MWh	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
Phase IV Carryover Savings												
Cumulative Percent Reduction from Baseline	1%		1%		2%		3%		4%		4%	
Commission-Identified Goal											1,111,685	

Table 3 and

Table 4 present the key peak demand accounting elements for Phase V as outlined in the Phase V Final Order. Table 3 summarizes overall demand savings requirements and compliance metrics, providing a consolidated view of total plan peak demand reduction targets across the program portfolio.

Table 4 complements this summary by detailing seasonal demand savings, distinguishing between summer and winter performance. Together, these tables provide peak demand reduction savings for demand impacts aligning TRM methodologies for accurate evaluation.

Table 3. Summary of PECO's Phase V Plan: Summary of Portfolio Demand Savings

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
Baseline	7,899	7,899	7,899	7,899	7,899	7,899
Market Rate Residential Sector (<i>exclusive of Low-Income</i>) – Projected Incremental Annual Savings	10.5	16.8	16.1	16.7	12.2	72.2
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	2.3	2.1	2.2	2.2	1.9	10.7
SCI Sector – Projected Incremental Annual Savings	12.0	15.2	16.0	16.6	10.4	70.2

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
LCI Sector – Projected Incremental Annual Savings	14.0	18.8	21.9	25.5	20.3	100.5
Coincident Demand Reduction from EE Subtotal	38.8	53.0	56.1	61.0	44.7	253.5
Residential Load Shifting - Projected MW Savings	8.7	9.4	10.3	11.3	12.4	10.4
SCI Sector Load Shifting – Projected MW Savings	0.1	0.1	0.1	0.1	0.1	0.1
LCI Sector Load Shifting – Projected MW Savings	0.1	0.3	0.4	0.5	0.5	0.4
Daily Load Shifting Subtotal	8.9	9.9	10.9	11.9	13.0	10.9
Cumulative Projected Compliance Savings	40.6	95.5	153.8	217.2	264.5	264.5
Cumulative EE&C Plan Total – Percentage of Target to be Met	21%	49%	79%	111%	136%	136%
Estimated Phase IV Carryover Savings						7.2
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	47.8	102.7	161.0	224.4	271.7	271.7
Cumulative Percent Reduction from Baseline	0.51%	1.21%	1.95%	2.75%	3.35%	3.35%
Commission-Identified Goal						194.8

Table 4. Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW	Winter MW	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	15.0	10.5	22.5	15.4	22.1	14.4	23.0	14.8	16.8	11.2	99.4	66.4
Coincident Reduction from EE - Non-Residential	28.5	23.6	37.4	30.6	41.3	34.4	44.2	40.0	31.7	29.7	183.1	158.2
Daily Load Shifting - Residential	6.1	11.2	6.7	12.2	7.4	13.3	8.2	14.4	9.0	15.7	7.5	13.4

Daily Load Shifting - Non-Residential	0.2	0.2	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.5	0.5
Total											290.5	238.4
Phase V Peak Demand Reduction Target											194.8	
Percentage of Goal in Season											149%	122%

Table 5 provides a summary of the portfolio costs by sector.

Table 5. Summary of Portfolio Costs¹⁴

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%
Residential Market Rate	\$15,859	21%	\$18,047	21%	\$18,385	20%	\$19,898	21%	\$17,324	22%	\$89,513	21%
Residential Low-Income	\$9,435	13%	\$9,509	11%	\$9,823	11%	\$9,994	10%	\$8,213	10%	\$46,974	11%
SCI	\$18,552	25%	\$21,714	25%	\$23,179	26%	\$24,214	25%	\$18,194	23%	\$105,853	25%
LCI	\$17,558	23%	\$22,754	27%	\$25,890	29%	\$28,707	30%	\$22,888	29%	\$117,796	28%
Common Costs	\$13,450	18%	\$13,450	16%	\$13,450	15%	\$13,450	14%	\$13,450	17%	\$67,250	16%
Total Portfolio Budget	\$74,854	100%	\$85,474	100%	\$90,727	100%	\$96,263	100%	\$80,069	100%	\$427,386	
SWE Cost	\$0		\$0		\$0		\$0		\$0		\$0	

¹⁴ SCI and LCI Totals are inclusive of Municipal Lighting

1.4 Summary of Program Implementation

Program implementation from Phase IV to Phase V will be as seamless as possible based on PECO's planning for Phase V. Data tracking and evaluation, measurement, and verification ("EM&V") startup activities will begin in January 2026. In March 2026, PECO and program implementation CSPs will begin the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach are in place. The programs will launch on June 1, 2026, and implementation will occur from June 1, 2026, through May 31, 2031.

1.5 Summary Description of PECO's Strategy to Acquire at Least 15% of Its Consumption Reduction and Peak Demand Reduction Target Each Year

PECO's program portfolio is designed to produce significant savings in each of the five program years. As indicated in Table 2 and Table 3, PECO projects that no less than 15% of the five-year savings and peak demand reduction compliance targets will be achieved in each program year.

1.6 Summary Description of PECO's Implementation Strategy to Acquire at Least 75% of the Portfolio Megawatt Compliance Target in Each Season

PECO's program portfolio is structured to achieve at least 75% of the seasonal megawatt (MW) plan target in each program cycle. Throughout Phase V, PECO will collaborate closely with CSPs to monitor performance and confirm that progress toward this target is consistently tracked and maintained, enabling timely adjustments and successful compliance across the phase. Seasonal PDRs in compliance with the portfolio megawatt plan target are detailed in Table 4.

1.7 Summary Descriptions of PECO's Implementation Strategy to Manage the EE&C Portfolio and Engage Customers and Trade Allies

PECO will take several steps to confirm the effective Act 129-compliant implementation of this EE&C Plan. These steps include:

- **Close Coordination Between PECO and the CSPs:** PECO will oversee the performance and service obligations of CSPs and make sure the CSPs' delivery is aligned with the approved EE&C Plan.
- **Coordination with Non-Act 129 Programs:** In addition to programs implemented under Act 129, PECO is exploring collaborations with other initiatives in its service territory in an effort to maximize savings and improve customer experience. This includes, but is not limited to, exploring aligning PECO's electric energy efficiency programs with PECO's natural gas efficiency offerings, braiding funding with the Pennsylvania

Department of Environmental Protection (“PA DEP”), administration of Inflation Reduction Act (IRA) home energy rebate programs, and exploring collaboration with the City of Philadelphia’s housing programs, such as the Basic Systems Repair Program.¹⁵ Low-income subprogram components may coordinate with PECO’s Low-Income Usage Reduction Program (“LIURP”),¹⁶ PECO’s Customer Assistance Program (CAP),¹⁷ the Low Income Home Energy Assistance Program (“LIHEAP”),¹⁸ and the Weatherization Assistance Program (“WAP”),¹⁹ where appropriate. These partnerships aim to expand program reach, integrate resources, and deliver additional energy savings for customers. Additionally, PECO is exploring opportunities to collaborate with the City of Philadelphia’s HOME Plan, which includes multiple programs focused on improving home condition and implementing health and safety upgrades.

- **Customer and Market Actor Experience:** A positive customer and market actor experience is essential. CSPs will work closely with customers throughout Phase V to help incorporate energy efficiency into their long-term planning projects. Customers will be offered innovative options to engage with the program and market actors will be supported for their program participation.
- **Trade Ally Engagement:** PECO’s programs will use a collaborative approach to engage a diverse network of trade allies including contractors, distributors, and other market actors who are essential to delivering Act 129 programs. Engagement strategies include targeted recruitment, inclusive outreach, structured onboarding, and ongoing training, supported by clear guidelines, user-friendly portals, and regular communication. Trade allies will receive technical assistance, marketing resources, and streamlined processes to reduce administrative burdens while supporting quality installations and customer satisfaction. For example, PECO will continue collaboration opportunities with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters. PECO will reach out to the Energy Coordinating Agency and any other existing programs in PECO’s service territory that provide heat pump training to provide an opportunity to include them in any discussions.
- **E&O:** PECO will have an E&O CSP responsible for educating residential, low-income, and multifamily customers about energy efficiency programs, generating qualified leads, and managing outreach activities. The E&O CSP will deliver accessible, innovative, and measurable outreach; collaborate with PECO and community partners; and provide regular reports on the impact of E&O activities. E&O CSP activities may include but are not limited to:
 - Engage and educate customers (residential, low-income, and multifamily) about energy efficiency through events, materials, and presentations.
 - Generate and track qualified leads for PECO’s Act 129 programs, focusing on measurable outcomes.
 - Host or attend community events to educate and generate leads.

¹⁵ PHDC, [Basic Systems Repair Program](#).

¹⁶ PECO, [Low-Income Usage Reduction Program \(LIURP\)](#).

¹⁷ CAP, [Customer Assistance Program - Percentage of Income Payment Plan \(CAP-PIPP\)](#)

¹⁸ PECO, [Low-Income Home Energy Assistance Program \(LIHEAP\)](#).

¹⁹ Pennsylvania Department of Community & Economic Development, [Weatherization Assistance Program \(WAP\)](#).

- Manage the Energy Force Ambassador program, which empowers people with disabilities to become energy efficiency educators and ambassadors in the greater Philadelphia region.
 - Implement accessible and equitable outreach, targeting underserved communities and using multilingual and accessible strategies.
 - Report regularly to PECO on activities, lead generated, and event metrics.
 - Collaborate with PECO teams, external partners, and community organizations.
 - Continuously improve outreach and education tactics based on feedback and performance data.
- **Data Tracking System:** A third-party database vendor will maintain PECO's tracking database. Database protocols support accurate data entry through proper field definitions and input validations. Program activity tracking queries facilitate program tracking and reporting for PECO and the PUC. The implementation CSPs upload program data into the database at defined intervals and according to the data protocols. The independent evaluation contractor can access the information in the database.
 - **Pre-Launch Period:** The implementation schedule for each program includes a pre-launch period to properly prepare for the program launch. This time will be used to refine the program, develop protocols and training materials, recruit trade allies, conduct educational activities, and develop and print incentive applications. The elements will be in place prior to full program operation. They will also be reviewed during process evaluations so that improvements may be incorporated during this plan cycle.
 - **Continuous Improvement:** PECO and its independent evaluation contractor will regularly review program protocols, procedures, participant and market actor satisfaction, savings, and spending to identify and address issues that arise during program operation and to facilitate ongoing program improvement.

1.8 Summary Description of PECO's Data Management, Quality Assurance, and Evaluation Processes

PECO's data tracking system collects and stores program and invoice data from CSPs. CSPs will input projects and determine incentives. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will support PECO's quality assurance (QA) process and EM&V requirements. PECO will use evaluation findings to prioritize the implementation of high-value measures.

1.9 Summary Description of the Cost Recovery Mechanism

As Act 129 requires, PECO's EE&C Plan costs are recoverable through a 66 Pa. C.S. § 1307 cost-recovery mechanism. In its Phase V Final Order, the PUC provided direction on the cost recovery tariff mechanism. The Commission described a Phase V mechanism like the Phase I through Phase IV mechanisms. The mechanism will be designed to recover (on a full and current basis, without interest, from each customer class) all prudent and reasonable EE&C Plan costs assigned to each class. In addition, the PUC required that the mechanism be reconciled annually with revised rates effective June 1 of each program year. PECO proposes

to use a cost recovery mechanism like those used in prior phases but modified to meet the additional Phase V requirements.

As with Phase I through Phase IV, PECO's proposed Phase V cost recovery mechanism includes four separate recovery charges, one for the Residential rate class (which includes low-income customers), one for the Small Commercial and Industrial (SCI) rate class, one for the Large Commercial and Industrial (LCI) rate class, and one for the Municipal Lighting rate class (streetlights, and alley lights).²⁰ For the government, nonprofit, and institutional (GNI) customers defined in Act 129, PECO does not have a separate recovery mechanism because its electric accounts are included in the SCI and LCI rate classes. Four separate charges were developed to confirm that the rate classes financing the measures are those receiving the direct energy and conservation benefits. Section 7 includes a detailed description of and estimated values for the cost recovery mechanisms.

²⁰ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

2. Energy-Efficiency Portfolio/Program Summary Tables and Charts

Section 2 of PECO's EE&C Plan provides a comprehensive quantitative overview of the five-year phase period. Section 2.1 describes the portfolio of programs and summarizes total energy savings. Section 2.2 offers a deeper analysis of the portfolio, including cost-effectiveness results, annual energy savings, and peak demand reductions broken down by year and seasonal trends. Section 2.3 presents the budget framework and parity analysis, comparing program expenditures with the overall EE&C budget as well as PECO's total revenue and sales.

2.1 Market Rate Residential, Residential Low-Income, SCI, and LCI Sector Summaries

Table 6 provides brief summaries, as well as the energy and peak demand reductions for each program.

Table 6. Program Summaries¹

	Program Name	Program Market	Program Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%)	
Residential Program	Residential Energy Efficiency	Residential	The program goal is to increase the energy efficiency and peak demand reduction in residential spaces through a variety of incentive mechanisms, home assessments, and appliance recycling.	PY18-22	242,020	2,790,254	50.0	17%	19%
	Residential Home Energy Reports	Residential	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-use information, personal and neighborhood comparisons, and energy savings recommendations.	PY18-22	142,549	570,196	32.2	10%	12%
	Totals for Residential Sector				384,569	3,360,450	82.2	27%	31%
Residential Program	Low-Income Energy Efficiency	Low-Income	The program goal is to improve the energy efficiency and peak demand reduction for low-income customers to help make their homes more affordable.	PY18-22	63,598	426,338	10.1	4%	4%
	Low-Income Home Energy Reports	Low-Income	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-use information, personal and neighborhood comparisons, and	PY18-22	5,374	21,496	1.1	0%	0%

	Program Name	Program Market	Program Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%)	
			energy savings recommendations.						
	Totals for Low-Income Sector				68,972	447,834	11.1	5%	4%
SCI Programs	Non-Residential Energy Efficiency	Small Commercial	The program offers a comprehensive and cross-cutting array of opportunities so small commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	427,253	6,081,008	68.5	29%	26%
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.	PY18-22	755	6,737	0.1	0%	0%
	Low-Income Energy Efficiency	Multifamily ²¹	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-income multifamily buildings.	PY18-22	8,976	87,044	1.6	1%	1%
	Totals for SCI Sector				436,984	6,174,790	70.3	30%	27%
LCI Programs	Non-Residential Energy Efficiency	Large Commercial	The program offers a comprehensive and cross-cutting array of opportunities so large commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	549,355	7,930,365	99.1	38%	37%
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.	PY18-22	755	6,737	0.1	0%	0%
	Low-Income Energy Efficiency	Multifamily ²²	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-	PY18-22	8,976	87,044	1.6	1%	1%

²¹ Costs for master-metered projects are recovered from the Small and Large C&I sectors. Low-income master-metered buildings are recovered from the Small and Large C&I sectors and are counted towards the low income carveout target.

²² Id.

Program Name	Program Market	Program Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%)	
		income multifamily buildings.						
Totals for LCI Sector				559,086	8,024,146	100.9	39%	38%
Totals for Plan				1,449,612	18,007,220	264.5	100%	100%

¹ Municipal Lighting measures are included in both the SCI and the LCI sectors within the Non-Residential Program.

2.2 Plan Data: Costs, Cost-Effectiveness, and Savings by Program, Sector, and Portfolio

Various sections of this report contain the following data tables, as required by the PUC's Plan V template:

- Section 1.3: Table 1. Portfolio Summary of Lifetime Costs and Benefits of Energy Efficiency Measures
- Section 1.3: Table 2. Portfolio Summary of Energy and Demand Savings
- Section 1.3: Table 3. Summary of Portfolio Energy and Demand Savings
- Section 1.3:
- Table 4. Summary of Seasonal Demand Savings
- Section 1.3: Table 5. Summary of Portfolio Costs. Summary of Portfolio Costs
- Section 2.1: Table 6. Program Summaries

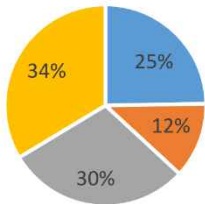
2.3 Budget and Parity Analysis

Table 7 presents the Budget and Parity Analysis, illustrating how program expenditures compare with PECO's total annual revenue and MWh sales by customer sector. Calculations are based on calendar year 2024 data, inclusive of collections for Electric Generation Suppliers, and include both bundled and delivery-only sales.

Table 7. Budget and Parity Analysis Summary

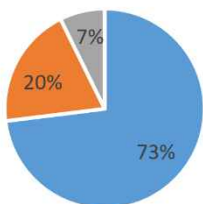
Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue ¹	% of EDC Total MWh Sales
Residential Sector (<i>exclusive of Low-Income</i>)	\$105,758,397	25%	73%	40%
Residential Low-Income Sub-Sector	\$51,769,033	12%		
Residential Subtotal	\$157,527,430	37%	73%	40%
SCI Sector	\$126,135,594	30%	20%	22%
LCI Sector	\$143,722,804	34%	7%	39%
Non-Residential Subtotal	\$269,858,398	63%	27%	60%
EDC TOTAL	\$427,385,830	100%	100%	100%
EDC TOTAL as Share of Budget Ceiling	100.0%			

% Budget by Customer Sector



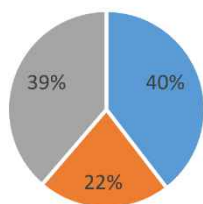
- Residential Sector (*exclusive of Low-Income*)
- Residential Low Income Sub-Sector
- Small C&I Sector
- Large C&I Sector

% Revenue by Customer Sector



- Residential Subtotal
- Small C&I Sector
- Large C&I Sector

% MWh Sales by Customer Sector



- Residential Subtotal
- Small C&I Sector
- Large C&I Sector

3. Program Descriptions

The objective of this section is to provide detailed descriptions of each proposed program, explain PECO's selection process, and demonstrate how these programs form balanced and integrated portfolios. Section 3.1 outlines the criteria and processes used for program selection. Section 3.2 focuses on residential sector programs, including Section 3.2.1, which addresses low-income sub-sector initiatives. Sections 3.3 and 3.4 detail offerings in the combined non-residential program for SCI and LCI customers, while Section 3.5 describes PECO's strategy for engaging and integrating the government/nonprofit/institutional sector (GNI) into its non-residential Act 129 program initiatives.

3.1 Discussion of Criteria and Process Used for Selection of Programs

This section contains portfolio objectives and metrics, the process for program development, how measures were included, and a discussion of the meaning of comprehensive programs in the context of the Plan.

3.1.1 Portfolio Objectives and Metrics that Define Program Success

PECO's portfolio objectives are to achieve the requirements set forth in the Phase V Final Order. The Plan will be implemented by delivering the required energy savings and peak demand reductions in a cost-effective manner, on pace, and with a reasonable mix of cost-effective technologies. Figure 2 outlines PECO's Phase V budget and savings compliance targets. These metrics will define Phase V's success.

Figure 2. PECO's Phase V Budget and Savings Targets

Overall Budget	Regulatory Energy Savings Target	Energy Savings Carve-Outs	Pace of Savings	Peak Demand Reduction Target
The total Phase V budget is not to exceed \$427.4 million. The total annual average budget will be \$85.5 million.	The Phase V MWh savings target is 1,111,685 MWh over 5 years, averaging 222,337 MWh/year (2.8% of 2009/2010 annual sales).	Low-income carve-out as defined in the Phase V Final Implementation Order ($\leq 150\%$ FPL): • 74,456 MWh for Phase V • 14,891 average annual MWh/year	The portfolio must plan to achieve at least 15% of MWh savings target each year (166,753 MWh).	The Phase V peak demand target is 194.8 MW. The portfolio must reduce at least 15% of this target each year and achieve at least 75% of the portfolio compliance target (146.1 MW) each season.

PECO will monitor portfolio performance and make mid-course corrections as necessary to:

- Generate energy savings through streamlined processes that make participation easy for customers and market actors;
- Monitor the marketplace for additional measures and solutions that could be offered in the future;
- Maintain a comprehensive set of energy solution offerings across all end uses to all customers;
- Present a comprehensive and appropriate set of participation channels (e.g., retail versus contractor) through which customers can access energy efficiency solutions; and
- Reallocate program funds among components based on market participant response.

3.1.2 Process for Program Development

PECO's detailed and collaborative program development process resulted in a Phase V Plan with three programs (Residential,²³ Non-Residential, and HER²⁴). PECO took the following steps to develop the program structure:

- **Reviewed Phase IV Learnings:** PECO analyzed evaluation findings, research reports, and stakeholder feedback from Phase IV to identify opportunities for improvement and strategies to enhance performance in Phase V.
- **Assessed Market Potential:** PECO reviewed the SWE Phase V Potential Studies to determine achievable savings by customers segment and measure category to inform an innovative and achievable program design.
- **Evaluated Potential Program Structures:** PECO identified multiple program and subcomponent designed structures and evaluated them against design principles focused on flexibility, customer accessibility and experience, and operational efficiency.
- **Prioritized and Selected Preferred EE Design Elements:** For the non-behavioral programs, PECO developed preferred design elements for an ideal program structure and selected the program structure that met most of the design elements, resulting in a program structure that:
 - Provides a single CSP for the residential customer program and a single CSP for the non-residential program
 - Allows for flexibility to respond to market demands for measures and services
 - Offers consistent measures across residential and non-residential programs and provides mechanisms for customers to pursue comprehensive energy efficiency upgrades
 - Provides program-specific residential and non-residential call centers for individualized customer support
- **Defined Program Components:** PECO identified program components based on historical programs in PECO's territory, market research, best practices from other jurisdictions, and market factors in PECO's territory. Through the competitive RFP

²³ The Residential program includes program components for both market-rate and low-income customers.

²⁴ The HER program includes HERs for market-rate and low-income customers.

process, CSPs were responsible for developing comprehensive implementation strategies aligned with the scope of work and regulatory requirements.

This comprehensive approach reflects PECO's commitment to continuous improvement, stakeholder engagement, and market-driven design to allow Phase V programs to deliver energy savings and enhance customer experience.

3.1.3 How Energy Efficiency, Combined Heat and Power, Renewables, Load-Shifting, and Other Measures Were Included in the Portfolio

Per Section 1.2, bidding CSPs recommended program designs based on PECO's program design criteria and chose measures to include in the programs. CSPs used a data-driven approach and model to estimate the measures, participation levels, and incentive ranges using PECO's design workbook provided as part of the RFP process. Data inputs included the following:

- 2026 TRM;
- SWE IMC Database;
- Phase IV Act 129 Findings;
- Measure Modeling Efforts; and
- Benchmarking with Other Utility Energy Efficiency Portfolios.

Phase V places greater emphasis on peak demand reductions through energy efficiency and daily load shifting ("DLS"). PECO's program design reflects that DLS has significantly higher potential in the residential sector compared with non-residential. As DLS is a new offering for full-scale implementation, PECO will include all residential DLS measures within a dedicated DLS program component to isolate and monitor budgets, savings, and participation. For non-residential programs, PECO will implement DLS measures within the building optimization program component. These measures will be implemented alongside energy efficiency measures. Refer to Section 3.4 for additional details.

In the residential program, solar measures will be included in the Rebates program component alongside other energy efficiency offerings; refer to Section 3.2 for additional details. In the non-residential program, CHP and solar measures will be implemented through the Distributed Energy Resources program component; refer to Section 3.4 for additional details.

3.1.4 Fuel Switching Measures Proposed Minimum Standard and Justification for Threshold to Receive Program Support

As part of PECO's Act 129 initiative, the non-residential program will incorporate CHP projects. In alignment with the 2026 TRM, this measure will be assessed using a custom baseline informed by site-specific historical trend data.

3.1.5 PECO Program Delivery Alignment with Non-Act 129 Programs

Please reference Section 1.7 for details surrounding coordination with non-Act 129 programs.

3.1.6 Front-of-the Meter Measures Included and Expected Contribution

The Phase V portfolio does not include front-of-the-meter measures.

3.1.7 How PECO Defines Comprehensive in the Context of Plan Design and Delivery

PECO's measure mix aims to prioritize comprehensive measures. PECO will use the Commission's definition of a comprehensive measure as outlined in the Table 8 Addendum tab of the template tables. This includes measures that are defined as comprehensive on their own, such as heat pumps and insulation, as well as measures that are considered comprehensive only when paired with the installation of another comprehensive measure.

Residential Program: The comprehensive components in the Residential program include the Market Rate Single Family and Income-Eligible Single Family components.

In addition to offering comprehensive measures, as defined by the Commission, the Residential program is designed to have a comprehensive approach to implementation. The Residential program's comprehensive implementation approach includes delivering components that address a broader customer journey and the whole home by layering multiple measures, incentive streams, and customer support channels to maximize verified savings, affordability, and equity.

Non-Residential Program: The Existing Buildings component is the comprehensive component of the Non-Residential program.

In addition to offering comprehensive measures, the Non-Residential program is designed to have a comprehensive approach to implementation. The Non-Residential program's comprehensive approach includes a diverse mix of measures and services across multiple components, enabling customers to pursue energy efficiency through various pathways tailored to their needs. This approach integrates multiple components to facilitate broad accessibility to allow customers to claim incentives on deep energy savings.

3.1.8 TOU Contributions to Portfolio

PECO recognizes the potential of TOU rates to deliver measurable load shifting benefits and contribute to overall portfolio savings. Consistent with the Commission's guidance, PECO will not claim inherent load shifting benefits from TOU enrollment alone. Instead, PECO will leverage its EE&C Plan to drive customer adoption and maximize impacts through targeted engagement strategies including:

- **Customer Education:** Develop and deploy educational campaigns that explain TOU rate structures, benefits, and practical strategies for shifting usage to lower-cost periods. These campaigns will utilize multiple channels, including digital platforms, bill inserts, and community outreach.
- **Behavioral Programming:** Incorporate behavioral demand response elements that encourage customers to adjust consumption patterns in response to TOU signals. This

may include personalized usage reports, alerts, and tips tailored to individual consumption profiles.

- **Incentives:** Offer financial incentives to accelerate TOU enrollment and encourage sustained participation. Incentives may include enrollment bonuses, bill credits, or rebates tied to verified load shifting performance.

By combining education, behavioral programming, and incentives, PECO aims to bolster the load impacts of TOU adoption and help these measures contribute meaningfully to Phase V objectives. PECO will track enrollment, engagement, and performance metrics to evaluate the effectiveness of these strategies and adjust program delivery as needed.

3.2 Residential Sector

The residential sector, including both market rate and low-income customer populations, is served by two programs: the Residential program and the Residential HER program. Both programs have subprograms dedicated to serving low-income customers. Market rate customers are served through the Residential program and Residential HER program (described in this section) and low-income customers are served through the Residential Low-Income subprogram and the Residential Low-Income HER subprogram (described in Section 3.2.1).

Residential Program (2026-2031)

Objective

The Residential program objective is to increase energy efficiency in single family homes and individual units and common areas of multifamily buildings. PECO will meet this objective by:

- Providing incentives for customer purchases of efficient lighting, appliances, HVAC upgrades, solar, energy-savings devices, and other energy-savings technologies.
- Removing old, inefficient refrigerators, freezers, dehumidifiers, and room AC units from the PECO service area through responsible recycling.
- Driving the construction of energy-efficient homes and demonstrate their value to builders and homebuyers.
- Delivering no-cost and low-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.
- Supporting DLS and peak demand reduction by encouraging adoption of smart devices.

Target Market

The eligible population and target market for the Residential program includes existing residential single family, or new construction, and multifamily customers. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers:

- **Residential Single Family:** Includes PECO residential electric customers that are individually metered and do not qualify as low-income. Due to the long history of PECO's service territory, the residential housing stock is diverse in age and structure.
 - **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls. The CSP will provide owners with clear return-on-investment messaging and guidance through financing or rebate enrollment.
 - **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval for comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.
- **Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential program offers residential customers in single family and multifamily buildings opportunities to save energy across all of their electric end-uses. This customer-friendly approach will enable participants to make comprehensive energy efficiency upgrades to a variety of equipment types while working with a single PECO program, leading to deeper retrofits. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7. The following section describes program components.

Program Components

The Residential program contains the following market-rate program components:²⁵

- **In-Home Assessments:** Offers in-home or virtual assessments that include a home inspection, energy usage analysis, direct-install measures, and an energy education session, including, when finalized, information on the energy efficiency benefits of heat pumps, followed by a custom report to identify larger energy efficiency opportunities (e.g., insulation and air sealing), and encourage participation in other Residential

²⁵ Residential Low-Income subprogram components are discussed in Section 3.2.1

programs, including programs not managed by PECO, when the customer is believed to qualify. BPI-certified Energy Advisors will perform these assessments when possible. Units in individually metered multifamily buildings are served through this component as well.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups, if a suitable vendor is obtained to provide pick up services. Encourages participation in other programs.
- **Rebates:** Provides rebates for energy efficient measures through several channels, including downstream applications; trade ally and distributor networks that apply on behalf of customers or offer incentives directly on invoices; and point-of-purchase discounts at retail locations.
- **Online Marketplace:** Provides a one-stop shopping experience for instant rebates on efficient products with the opportunity to increase customer awareness of products and components.
- **New Construction:** Promotes building homes that are more comfortable, durable, and energy efficient than those built to code. Home Energy Rating System (HERS) raters collaborate with builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, electric vehicle [EV] managed charging, battery storage, water heaters) and behavioral measures, which may include TOU rates for eligible customers.
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote other Act 129 program offerings to customers through a variety of methods including:

- Sharing program information in new mover kits
- Promoting other offerings in emails, web content, and Home Energy Reports
- Sharing information about other Act 129 offerings during in-home energy assessments
- Providing customers with informational materials during appliances recycling drop-off events

Implementation Strategy

The Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

- **In-Home Assessments:** The CSP will offer two appointment types for customers:
 - **Energy Assessment** will provide customers with an in-depth walkthrough of their home, recommendations for whole-house improvements, and recommendations for other ways to save within the PECO portfolio of energy efficiency components and installation of energy savings products.
 - **Energy Assessment Plus** will be performed in accordance with BPI standards. Comprehensive audits will provide the same services as the Energy Assessment appointment and add depth and detail by using a variety of diagnostic equipment and inspection techniques such as building tightness testing and infrared thermography. Customers will receive more specific information to help them move forward with recommendations, including any applicable available incentives. At the completion of the assessment, customers will receive a detailed summary report outlining findings, recommended improvements, and available program offerings to help guide next steps.
- **Appliance Recycling:** The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners and dehumidifiers. An additional option will be available for customers to drop off regular household sized refrigerators and freezers at a designated location.
- **Rebates:** Rebates are available for eligible PECO customers on eligible HVAC equipment, appliances, water heating, solar systems, and other energy saving measures. Customers may apply for rebates, or HVAC and solar contractors may apply on a customer's behalf. The component also includes an instant markdown channel designed to deliver immediate savings to customers at the point of sale.
- **Online Marketplace:** A convenient platform where customers can purchase energy-efficiency products, including smart thermostats, air purifiers, dehumidifiers, and advanced power strips. The marketplace will offer exclusive seasonal manufacturer discounts and instant PECO rebates, making it easier for customers to upgrade to more energy efficient equipment.
- **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters.
- **DLS:** The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:
 - **Managed EV Charging** to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.
 - **Thermostat Optimization** to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.
 - **A Bring-Your-Own-Battery (BYOB)** offering that will discharge batteries to lower grid demand during peak periods. The offerings will enroll existing residential battery

systems to leverage existing infrastructure rather than providing incentives for new battery installation.

- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

The Residential program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, incentives, and program resource allocation) to meet the portfolio level targets.

One risk is the transition from Phase IV to Phase V. Part of this risk will be mitigated by the continuity in implementation CSP from Phase IV to Phase V. The CSP has extensive regulatory and market knowledge in Pennsylvania and prior extensive experience with PECO's energy efficiency programs.

An additional risk is market factors that are not controlled by PECO including changing federal and state guidelines and regulations, such as possible changes to the federal ENERGY STAR® program that is currently used to prescribe equipment eligibility in the 2026 TRM. If the ENERGY STAR program were to no longer exist, PECO would consider alternative options such as equipment verification through databases like DOE's Compliance Certification and Management System (CCMS).

Another potential risk to program design stems from external economic factors that could significantly increase incremental costs, such as substantial tariff impacts or prolonged periods of high inflation. Should these challenges arise and create prohibitive conditions during Phase V, PECO will proactively collaborate with stakeholders and the Commission to identify solutions.

As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential program are projected to incur costs of \$270,251,892 for Phase V after PECO incentives. These costs are calculated by subtracting incentives from incremental costs, representing the anticipated direct expenses for participating customers.

Ramp-Up Strategy

Minimal ramp-up will be needed for the In-Home Assessments, Rebates, Marketplace, Appliance Recycling, Multifamily, and New Construction components because similar components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received potential load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential program components.

- **In-Home Assessments:** Personalized email outreach; new mover kits; social media; targeted digital ads; community engagement through homeowner associations, newsletters, and events.
- **Appliance Recycling:** Emails; bill inserts; social media; cross-promotions with municipal recycling events.
- **Rebates:** In-store point-of-purchase signage; direct outreach from contractors; targeted emails; digital ads; social media.
- **Online Marketplace:** Website banners; digital ads; emails; social media.
- **New Construction:** Direct builder and rater outreach; education events and partnerships with trusted associations (i.e., Home Building Associations, housing authorities, community developers); technical assistance, case studies, and collaboration with manufacturers.
- **DLS:** Co-branded marketing (i.e., thermostats, EV chargers and batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; newsletters.
- **Multifamily:** Outreach to property managers and tenants through case studies, testimonials, and industry events; digital advertising.

Eligible Measures and Incentive Strategy

The measure mix is listed in Table 8 and includes a comprehensive mix of end-use technologies such as lighting, HVAC, appliances, shell, water heating, and plug loads. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 8. Residential Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁶	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
ENERGY STAR Refrigerators	per refrigerator	No	Yes, if paired with other comprehensive	Phase V TRM	\$128.41	14	\$0.00 - \$128.41
ENERGY STAR Clothes Washers	per washer	No	Yes, if paired with other comprehensive	Phase V TRM	\$35.72	14	\$0.00 - \$35.72
ENERGY STAR Clothes Dryers	per dryer	No	Yes, if paired with other comprehensive	Phase V TRM	\$206.34	14	\$0.00 - \$206.34
ENERGY STAR Dehumidifiers	per dehumidifier	No	Yes, if paired with other comprehensive	Phase V TRM	\$0.00	12	\$0.00 - \$25.00
Photovoltaic (PV) Solar Generation	per PV array	No	Yes, if paired with other comprehensive	Phase V TRM	\$15,232.00	15	\$0.00 - \$15,232.00
ENERGY STAR Freezers	per freezer	No	Yes, if paired with other comprehensive	Phase V TRM	\$38.93	11	\$0.00 - \$38.93
ENERGY STAR Coolers	per cooler	No	Yes, if paired with other comprehensive	Phase V TRM	\$281.84	14	\$0.00 - \$281.84
ENERGY STAR Dishwashers	per dishwasher	No	Yes, if paired with other comprehensive	Phase V TRM	\$79.45	10	\$0.00 - \$79.45
WH > 10% UBC \$0.30/kWh	per home	No	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
WH > 10% UBC HPWH \$0.60/kWh	per home	No	Yes	Phase V TRM	\$3,053.95	15	\$0.00 - \$3,053.95
HVAC Systems: PTAC	per PTAC	No	Yes	Phase V TRM	\$1,571.00	15	\$0.00 - \$1,571.00
HVAC Systems: PTHP	per PTHP	No	Yes	Phase V TRM	\$2,094.00	15	\$0.00 - \$2,094.00
High Efficiency Equipment: ASHP	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: CAC	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	No	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
Duct Sealing & Duct Insulation	per home	No	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$280.65
Heat Pump Water Heaters	per water heater	No	Yes	Phase V TRM	\$1,684.76	10	\$0.00 - \$1,684.76

²⁶ PECO applied the definition for comprehensive measure from Table 8 Addendum from the Final Act 129 Phase V EE&C Plan Template Tables Workbook, available at: [Energy Efficiency and Conservation \(EE&C\) Program | PA PUC](#) and specifically here: [1894161.xlsx](#)

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁶	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Residential Air Sealing	per home	No	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	No	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$857.72
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	No	Yes	Phase V TRM	\$300.00	15	\$0.00 - \$300.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	No	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$203.21
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJI Insulation	per home	No	Yes	Phase V TRM	\$500.00	15	\$0.00 - \$500.00
Basement or Crawl Space Wall Insulation	per home	No	Yes	Phase V TRM	\$155.63	15	\$0.00 - \$155.63
ENERGY STAR Windows	per window area	No	Yes	Phase V TRM	\$952.20	15	\$0.00 - \$952.20
Room Air Conditioners	per room A/C	No	Yes	Phase V TRM	\$95.08	9	\$0.00 - \$95.08
Window Heat Pump	per window heat pump	No	Yes	Phase V TRM	\$2,574.50	9	\$0.00 - \$2,574.50
High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP	per unit	No	Yes	Phase V TRM	\$2,192.37	15	\$0.00 - \$2,192.37
Solar Water Heaters	per water heater	No	Yes	Phase V TRM	\$1,111.33	15	\$0.00 - \$1,111.33
Dehumidifier Retirement	per dehumidifier	No	No	Phase V TRM	\$10.00	4	\$0.00 - \$10.00
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	No	No	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling with and without Replacement	per refrigerator	No	No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Room AC (RAC) Retirement	per room A/C	No	No	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	No	No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	No	No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
ENERGY STAR Certified Connected Thermostats	per thermostat	No	No	Phase V TRM	\$168.42	9	\$0.00 - \$168.42
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	No	No	Phase V TRM	\$4.40	2	\$0.00 - \$4.40

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁶	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	No	No	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	No	No	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	No	No	Phase V TRM	\$1.63	8	\$0.00 - \$3.25
Low-Flow Faucet Aerators: Direct install	per aerator	No	No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	No	No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	No	No	Phase V TRM	\$41.75	15	\$0.00 - \$42.00
Water Heater Tank Wrap	per tank	No	No	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	No	No	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	No	No	Phase V TRM	\$40.07	5	\$0.00 - \$60.00
LED Exit Signs	per sign	No	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	No	No	Phase V TRM	\$27.00	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	No	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	No	No	Phase V TRM	\$97.00	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	No	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00
Lighting: Permanent Fixture Removal	per fixture	No	No	Phase V TRM	\$25.00	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	No	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	No	No	Phase V TRM	\$52.00	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$250.00
Occupancy Sensor	per sensor	No	No	Phase V TRM	\$55.00	8	\$0.00 - \$55.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁶	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Customer Education: Adjust Thermostat	per home	No	No	Phase V TRM	\$20.00	1	\$0.00 - \$20.00
Customer Education: Shorter Showers	per home	No	No	Phase V TRM	\$15.00	1	\$0.00 - \$15.00
Customer Education: Wash Laundry in Cold Water	per home	No	No	Phase V TRM	\$15.00	1	\$0.00 - \$15.00
Advanced Power Strips: Kit	per advanced power strip	No	No	Phase V TRM	\$40.07	5	\$0.00 - \$40.07
Connected Smart Thermostat	per unit	No	No	Phase V TRM	\$17.30	1	\$0.00 - \$23.06
Electric Vehicle Managed Charging (Actively Managed)	per unit	No	No	Phase V TRM	\$108.00	1	\$0.00 - \$144.00
Behind the Meter Battery Storage (Bring Your Own)	per unit	No	No	Phase V TRM	\$643.50	1	\$0.00 - \$858.00
Water Heater Pipe Insulation	per water heater	No	No	Phase V TRM	\$59.80	11	\$0.00 - \$59.80
Smart Water Heater Controls	per water heater controller	No	No	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	No	No	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Advanced Power Strips: Tier 1	per advanced power strip	No	No	Phase V TRM	\$30.00	5	\$0.00 - \$30.00
Advanced Power Strips: Tier 2	per advanced power strip	No	No	Phase V TRM	\$75.00	5	\$0.00 - \$75.00
ENERGY STAR Certified Connected Thermostats: ASHP	per thermostat	No	No	Phase V TRM	\$168.42	9	\$0.00 - \$190.00
ENERGY STAR Certified Connected Thermostats: CAC-Only	per thermostat	No	No	Phase V TRM	\$168.42	9	\$0.00 - \$190.00
ENERGY STAR Air Purifiers	per air purifier	No	No	Phase V TRM	\$66.03	9	\$0.00 - \$168.75
ECM Circulation Fans	per fan	No	No	Phase V TRM	\$352.79	5	\$0.00 - \$352.79
Air Conditioner & Heat Pump Maintenance	per unit	No	No	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
Furnace Maintenance	per furnace	No	No	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
ENERGY STAR Bathroom Exhaust Fan	per exhaust fan unit	No	No	Phase V TRM	\$208.00	15	\$0.00 - \$208.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁶	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Water Heater Pipe Insulation: Kit	per water heater	No	No	Phase V TRM	\$3.00	11	\$0.00 - \$3.00
Water Heater Pipe Insulation - Instant Markdown	per water heater	No	No	Phase V TRM	\$6.00	11	\$0.00 - \$6.00
Residential Occupancy Sensors	per sensor	No	No	Phase V TRM	\$65.90	8	\$0.00 - \$65.90
Holiday Lights	per one strand of holiday lights	No	No	Phase V TRM	\$0.67	10	\$0.00 - \$0.67
GSHP Desuperheaters	per desuperheater	No	No	Phase V TRM	\$2,260.05	15	\$0.00 - \$2,260.05
Air Handler Filter Whistles	per filter whistle	No	No	Phase V TRM	\$5.19	5	\$0.00 - \$5.19
Drain Water Heat Recovery Units	per unit	No	No	Phase V TRM	\$734.58	15	\$0.00 - \$734.58
Cooler Recycling with and without Replacement	per cooler	No	No	Phase V TRM	\$281.84	9	\$0.00 - \$281.84
Residential Induction Cooktop	per induction cooktop	No	No	Phase V TRM	\$1,087.38	15	\$0.00 - \$1,087.38
ENERGY STAR Ceiling Fans	per ceiling fan	No	No	Phase V TRM	\$252.74	10	\$0.00 - \$252.74
ENERGY STAR Pool Pumps	per pool pump	No	No	Phase V TRM	\$145.38	10	\$0.00 - \$145.38
Single Speed Pool Pump Replacement	per VFD pool pump	No	No	Phase V TRM	\$986.77	3.3	\$0.00 - \$986.77
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to include in the program and offer an incentive of up to the incremental measure costs²⁷ for any measure that is not listed in Table 8 but identified in the TRM or approved as an interim measure protocol.

²⁷ The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here [Total Resource Cost Test | PA PUC](#)

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted. Any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

Assumed EM&V

The Residential program's proposed evaluation methodology and data collection are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO will follow the SWE's Evaluation Framework, utilize a SWE-approved Phase V evaluation plan, and utilize an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program and participation trends
- Energy savings and peak demand reductions associated with installed efficient equipment or removed equipment
- Program implementation costs and program cost-effectiveness

Data for evaluating the program will come from some of the following sources:

- Tracking system data
- Engineering or TRM estimates of measure savings
- Follow-up surveys of customers, retailers, trade allies, and service providers who participate in the program
- Program implementer and PECO staff surveys or interviews

- Evaluation of billing data
- Local weather data

Program impacts will be determined using a variety of data sources and tested techniques. These strategies may include:

- Field and phone verification, review of program records and incentive applications
- Project reviews referencing per-unit deemed or default energy savings
- Billing analysis
- Installation follow-up phone interviews with program participants to identify: Rebated measures installed and persistence (e.g., are the measures still installed?), and other changes to the business that affect energy usage, such as changes in occupancy or changes in building size
- Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response includes the following strategies:
 - Assess marketing and promotional efforts
 - Monitor contractor data-tracking system and implementation procedures to confirm that the program is being implemented as designed
 - Interview utility staff, contractors, equipment vendors, and customers
 - Survey program participants
 - Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the Residential program through a CSP. PECO will confirm that major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six full-time equivalent (FTE) staff dedicated to the residential sector.

Savings Projections

Table 9. Residential Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Dehumidifier Retirement	2.4.12	Energy Savings (MWh)	955	979	1,028	1,077	857	4,897
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	956	980	1,029	1,078	857	4,900
Low-Capacity Refrigerator / Freezer Recycling without Replacement	2.4.4	Energy Savings (MWh)	85	87	92	96	78	438
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	286	293	308	322	261	1,470
Refrigerator / Freezer Recycling with and without Replacement	2.4.3	Energy Savings (MWh)	19	20	20	22	17	98
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	24	25	26	28	22	125
Room AC (RAC) Retirement	2.2.8	Energy Savings (MWh)	51	52	54	57	45	260
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	390	400	420	440	350	2,000
Low-Flow Faucet Aerators: Kit	2.3.6	Energy Savings (MWh)	423	445	481	516	430	2,295
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.0	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	26,881	28,249	30,529	32,809	27,337	145,805
Low-Flow Showerheads: Kit	2.3.7	Energy Savings (MWh)	851	953	1,124	1,295	885	5,108
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.0
		Projected Participation	50,506	56,599	66,754	76,909	52,537	303,305
WH > 10% UBC \$0.30/kWh	2.7.1	Energy Savings (MWh)	3,200	3,170	3,192	3,216	3,246	16,024
		Summer Demand Reduction (MW)	1.1	1.1	1.1	1.1	1.1	5.5
		Winter Demand Reduction (MW)	0.7	0.7	0.7	0.7	0.7	3.3
		Projected Participation	1,600	1,585	1,596	1,608	1,623	8,012
WH > 10% UBC HPWH \$0.60/kWh	2.7.1	Energy Savings (MWh)	390	585	780	975	1,170	3,900
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	0.9
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	0.9
		Projected Participation	100	150	200	250	300	1,000
ENERGY STAR Certified Connected Thermostats	2.2.12	Energy Savings (MWh)	2,459	2,730	3,181	3,632	2,549	14,551
		Summer Demand Reduction (MW)	0.4	0.4	0.5	0.5	0.4	2.1
		Winter Demand Reduction (MW)	0.5	0.5	0.6	0.7	0.5	2.9
		Projected Participation	6,681	7,416	8,641	9,866	6,926	39,530
Residential LED Lighting: ENERGY	2.1.1	Energy Savings (MWh)	71	73	76	80	64	364
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
STAR Screw-in LED Bulb (Standard)		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1,707	1,750	1,838	1,925	1,532	8,752
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	6	7	7	7	6	33
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Energy Savings (MWh)	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	98	100	105	110	88	501
LED and Electroluminescent Nightlights	2.1.3	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	49	50	53	55	44	251
Low-Flow Faucet Aerators: Direct install	2.3.6	Energy Savings (MWh)	4	4	4	5	4	21
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	73	75	79	83	66	376
Low-Flow Showerheads: Direct install	2.3.7	Energy Savings (MWh)	2	2	2	2	1	8
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	25	25	27	28	22	127
Thermostatic Shower Restriction Valves	2.3.8	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	5	5	6	6	5	27
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Advanced Power Strips	2.5.1	Energy Savings (MWh)	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	10	10	11	11	9	51
	2.4.14	Energy Savings (MWh)	24	24	26	27	21	121
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
ENERGY STAR Air Purifiers - Direct Install LI & MF		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	82	83	88	92	73	418
LED Exit Signs	3.1.4	Energy Savings (MWh)	3	4	4	4	3	18
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	12	13	13	14	11	63
Lighting Retrofits - Other Interior Fixtures	3.1.1	Energy Savings (MWh)	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	20	20	21	22	18	101
Lighting Retrofits - Outdoor floods	3.1.1	Energy Savings (MWh)	15	15	16	17	13	76
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	25	25	27	28	22	127
Lighting Retrofits - Parking Garage	3.1.1	Energy Savings (MWh)	6	6	6	7	5	29
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	8	8	8	9	7	40
Lighting Retrofits - Parking Lot	3.1.1	Energy Savings (MWh)	16	16	17	18	14	82
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	25	25	27	28	22	127
Lighting: Permanent Fixture Removal	3.1.1	Energy Savings (MWh)	87	89	93	98	78	444
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	244	250	263	275	219	1,251
Linear LED: Lamp Replacement	3.1.1	Energy Savings (MWh)	12	12	13	14	11	62
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	366	375	394	413	328	1,876
Linear LED: Retrofit Fixture, surface mount	3.1.1	Energy Savings (MWh)	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	25	25	27	28	22	127
Linear LED: Retrofit Fixture, troffer	3.1.1	Energy Savings (MWh)	6	6	7	7	6	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	25	25	27	28	22	127
Occupancy Sensor	2.1.2	Energy Savings (MWh)	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Customer Education: Adjust Thermostat	N/A	Projected Participation	6	7	7	7	6	33
		Energy Savings (MWh)	7	8	8	8	7	38
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
Customer Education: Shorter Showers	N/A	Projected Participation	244	250	263	275	219	1,251
		Energy Savings (MWh)	4	4	4	4	3	19
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Customer Education: Wash Laundry in Cold Water	N/A	Projected Participation	244	250	263	275	219	1,251
		Energy Savings (MWh)	9	9	9	10	8	44
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
HVAC Systems: PTAC	2.2.1	Projected Participation	244	250	263	275	219	1,251
		Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
HVAC Systems: PTHP	2.2.1	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	14	14	14	14	14	70
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Low-Flow Faucet Aerators: Kit	2.3.6	Projected Participation	4	4	4	4	4	20
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Low-Flow Showerheads: Kit	2.3.7	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Power Strips: Kit	2.5.1	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Connected Smart Thermostat	Load Shifting Measure	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.8	0.8	0.9	0.9	1.0	4.5
		Winter Demand Reduction (MW)	1.7	1.9	2.0	2.1	2.3	10.0
Electric Vehicle Managed Charging (Actively Managed)	Load Shifting Measure	Projected Participation	17,955	19,209	20,539	21,983	23,522	103,208
		Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8
	Load Shifting Measure	Projected Participation	1,200	1,440	1,728	2,074	2,488	8,930
	Load Shifting Measure	Energy Savings (MWh)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Behind the Meter Battery Storage (Bring Your Own)		Summer Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Winter Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Projected Participation	500	575	661	760	875	3,371
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	2.1.1	Energy Savings (MWh)	486	461	415	374	336	2,072
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.0	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.0	0.0	0.0	0.2
		Projected Participation	11,688	11,103	9,993	8,994	8,094	49,873
		Energy Savings (MWh)	544	517	465	419	377	2,322
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	16,706	15,870	14,283	12,855	11,570	71,284
		Energy Savings (MWh)	358	340	306	275	248	1,527
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	8,135	7,728	6,955	6,260	5,634	34,712
		Energy Savings (MWh)	3	2	2	2	2	11
LED and Electroluminescent Nightlights	2.1.3	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	725	616	524	445	378	2,689
		Energy Savings (MWh)	1	1	1	1	1	3
Low-Flow Faucet Aerators: Direct install	2.3.6	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	12	12	12	12	12	60
		Energy Savings (MWh)	5	4	4	3	3	18
Low-Flow Showerheads: Direct install	2.3.7	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	77	65	56	47	40	286
		Energy Savings (MWh)	0	0	0	0	0	0
Thermostatic Shower Restriction Valves	2.3.8	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	1	1	1	1	1	4
Water Heater Temperature Setback	2.3.4	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	12	12	12	12	12	60
		Energy Savings (MWh)	47	47	47	47	47	237
Water Heater Pipe Insulation	2.3.5	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	112	112	112	112	112	560
		Energy Savings (MWh)	0	0	0	0	0	0
	2.3.10	Energy Savings (MWh)	0	0	0	0	0	0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Smart Water Heater Controls		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	2.6.2	Energy Savings (MWh)	106	122	150	177	111	666
		Summer Demand Reduction (MW)	0.0	0.0	0.1	0.1	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	17,440	20,140	24,640	29,140	18,340	109,700
Advanced Power Strips: Tier 1	2.5.1	Energy Savings (MWh)	59	59	59	59	59	293
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	822	822	822	822	822	4,110
Advanced Power Strips: Tier 2	2.5.1	Energy Savings (MWh)	64	64	64	64	64	320
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	466	466	466	466	466	2,330
ENERGY STAR Certified Connected Thermostats: ASHP	2.2.12	Energy Savings (MWh)	14	28	43	43	43	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	20	40	60	60	60	240
ENERGY STAR Certified Connected Thermostats: CAC-Only	2.2.12	Energy Savings (MWh)	5	18	18	18	18	79
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	20	80	80	80	80	340
ENERGY STAR Air Purifiers	2.4.14	Energy Savings (MWh)	318	338	371	404	325	1,756
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Projected Participation	1,797	1,910	2,098	2,285	1,835	9,925
High Efficiency Equipment: ASHP	2.2.1	Energy Savings (MWh)	2,099	2,525	3,222	3,919	2,246	14,011
		Summer Demand Reduction (MW)	0.2	0.3	0.4	0.5	0.3	1.6
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.1	0.7
		Projected Participation	1,716	2,064	2,634	3,204	1,836	11,454
High Efficiency Equipment: CAC	2.2.1	Energy Savings (MWh)	569	683	872	1,060	608	3,793
		Summer Demand Reduction (MW)	1.7	2.1	2.7	3.2	1.9	11.6
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	2,112	2,538	3,238	3,938	2,258	14,084
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	2.2.3	Energy Savings (MWh)	1,367	1,642	2,095	2,549	1,461	9,114
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.3	0.1	0.9
		Projected Participation	2,262	2,718	3,468	4,218	2,418	15,084
ECM Circulation Fans	2.2.4	Energy Savings (MWh)	721	866	1,106	1,346	771	4,811
		Summer Demand Reduction (MW)	0.2	0.3	0.3	0.4	0.2	1.5

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Air Conditioner & Heat Pump Maintenance	2.2.6	Winter Demand Reduction (MW)	0.1	0.2	0.2	0.3	0.2	0.9
		Projected Participation	3,760	4,516	5,766	7,016	4,016	25,074
		Energy Savings (MWh)	254	301	380	458	269	1,662
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
Duct Sealing & Duct Insulation	2.2.10	Projected Participation	807	957	1,207	1,457	857	5,285
		Energy Savings (MWh)	42	42	42	42	42	209
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	146	146	146	146	146	730
Furnace Maintenance	2.2.13	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	11	11	11	11	11	55
		Energy Savings (MWh)	11	13	17	20	12	73
ENERGY STAR Bathroom Exhaust Fan	2.2.14	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	162	192	242	292	172	1,060
		Energy Savings (MWh)	408	499	641	776	453	2,777
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
Heat Pump Water Heaters	2.3.1	Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation	227	278	357	432	252	1,546
		Energy Savings (MWh)	45	45	45	45	45	227
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Residential Air Sealing	2.6.1	Projected Participation	82	82	82	82	82	410
		Energy Savings (MWh)	109	109	109	109	109	544
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	61	61	61	61	61	305
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	2.6.3	Energy Savings (MWh)	15	15	15	15	15	74
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	80	80	80	80	80	400
		Energy Savings (MWh)	22	22	22	22	22	110
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	2.6.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	20	20	20	20	20	100
		Energy Savings (MWh)	34	34	34	34	34	172
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJI Insulation	2.6.3	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	93	93	93	93	93	465

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Basement or Crawl Space Wall Insulation	2.6.4	Energy Savings (MWh)	3	3	3	3	3	17
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	4	4	4	4	4	19
ENERGY STAR Windows	2.6.5	Energy Savings (MWh)	3	6	12	15	17	53
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	10	20	40	48	58	176
Advanced Power Strips: Kit	2.5.1	Energy Savings (MWh)	1,488	1,488	1,488	1,488	1,488	7,440
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.2
		Projected Participation	20,000	20,000	20,000	20,000	20,000	100,000
Water Heater Pipe Insulation: Kit	2.3.5	Energy Savings (MWh)	412	412	412	412	412	2,060
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	20,000	20,000	20,000	20,000	20,000	100,000
Customer Education: Shorter Showers	2.9.1	Energy Savings (MWh)	44	44	44	44	44	218
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2,900	2,900	2,900	2,900	2,900	14,500
Customer Education: Wash Laundry in Cold Water	2.9.1	Energy Savings (MWh)	102	102	102	102	102	508
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2,900	2,900	2,900	2,900	2,900	14,500
Customer Education: Adjust Thermostat	2.9.1	Energy Savings (MWh)	87	87	87	87	87	435
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	2,900	2,900	2,900	2,900	2,900	14,500
Room Air Conditioners	2.2.7	Energy Savings (MWh)	27	32	41	50	29	179
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.0	0.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1,070	1,280	1,630	1,980	1,140	7,100
Window Heat Pump	2.2.9	Energy Savings (MWh)	71	84	108	131	75	469
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.3	0.4	0.4	0.5	0.3	2.0
		Projected Participation	113	135	172	210	120	750
ENERGY STAR Refrigerators	2.4.1	Energy Savings (MWh)	643	772	986	1,200	686	4,286
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation	8,925	10,710	13,685	16,660	9,520	59,500
ENERGY STAR Clothes Washers	2.4.8	Energy Savings (MWh)	297	357	456	555	317	1,981
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
ENERGY STAR Clothes Dryers	2.4.9	Projected Participation	4,800	5,760	7,360	8,960	5,120	32,000
		Energy Savings (MWh)	361	433	554	674	385	2,407
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	4,312	5,175	6,613	8,050	4,600	28,750
ENERGY STAR Dehumidifiers	2.4.11	Energy Savings (MWh)	1,329	1,589	2,024	2,458	1,415	8,816
		Summer Demand Reduction (MW)	0.3	0.3	0.4	0.5	0.3	1.8
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	5,350	6,400	8,150	9,900	5,700	35,500
		Energy Savings (MWh)	10,200	12,240	15,641	19,041	10,880	68,003
Photovoltaic (PV) Solar Generation	2.8.3	Summer Demand Reduction (MW)	2.5	3.0	3.8	4.7	2.7	16.6
		Winter Demand Reduction (MW)	0.3	0.3	0.4	0.5	0.3	1.9
		Projected Participation	1,125	1,350	1,725	2,100	1,200	7,500
		Energy Savings (MWh)	3,384	4,059	5,184	6,308	3,609	22,545
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.1	0.6
Advanced Power Strips	2.5.1	Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.1	0.8
		Projected Participation	38,525	46,205	59,005	71,805	41,085	256,625
		Energy Savings (MWh)	4,194	5,032	6,429	7,827	4,474	27,956
		Summer Demand Reduction (MW)	0.5	0.6	0.7	0.9	0.5	3.2
		Winter Demand Reduction (MW)	0.8	1.0	1.2	1.5	0.8	5.3
Water Heater Pipe Insulation - Instant Markdown	2.3.5	Projected Participation	56,290	67,540	86,290	105,040	60,040	375,200
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
Residential Occupancy Sensors	2.1.2	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
Holiday Lights	2.1.4	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP	2.2.2	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
GSHP Desuperheaters	2.2.5	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Air Handler Filter Whistles	2.2.11	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	2	2	2	2	2	9
Solar Water Heaters	2.3.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Drain Water Heat Recovery Units	2.3.9	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Freezers	2.4.2	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
ENERGY STAR Coolers	2.4.5	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	1
Cooler Recycling with and without Replacement	2.4.6	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Residential Induction Cooktop	2.4.7	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Dishwashers	2.4.10	Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
ENERGY STAR Ceiling Fans	2.4.13	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
ENERGY STAR Pool Pumps	2.8.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Single Speed Pool Pump Replacement	2.8.2	Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Estimated Program Budget (Total) by Year

Table 10. Residential Program Budget

Program Name:		Residential					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$13,709	\$14,601	\$15,949	\$17,317	\$14,917	\$76,493
Incentives (\$000)	Rebates	\$4,317	\$4,940	\$5,862	\$6,805	\$5,496	\$27,419
	Upstream/Midstream Buydown	\$1,418	\$1,681	\$2,121	\$2,560	\$1,505	\$9,285
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct-Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$7,060	\$7,952	\$9,300	\$10,667	\$8,270	\$43,248
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912
	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245
Percent Incentives		52%	54%	58%	62%	55%	57%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential program offers incentives to customers in the residential, SCI, and LCI sectors. The Residential program accounts for 55.3% of the residential sector, 0.05% of the SCI sector, and 0.04% of the LCI sector spending exclusive of common cost allocation. SCI and LCI spending are attributed to measures rebated through the Residential program to master metered multifamily buildings.

Table 11. Residential Summary of EE&C Costs

Sector	EE&C Subprogram	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM & V	AEPS Registration Support	Other				
Residential	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$165	\$1,510,591
SCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
LCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
Sector Total	Residential Energy Efficiency	\$43,248,211	\$0	\$0	\$0	\$24,911,942	\$8,332,916	\$0	\$0	\$0	\$76,493,069	\$316	\$163	\$1,549,903

Cost Effectiveness

Table 12. Residential TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)				
			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
	Program Year ²	NTGR		Paid by EDC	Paid by Participants							
<i>Residential</i>	<i>PY18</i>	<i>1.00</i>	<i>0.91</i>	\$7,060	\$37,412	\$6,649	\$51,121	\$12,910	\$25,446	\$8,386	\$0	\$46,742
<i>Residential</i>	<i>PY19</i>	<i>1.00</i>	<i>0.91</i>	\$7,952	\$43,940	\$6,649	\$58,541	\$14,229	\$29,101	\$9,698	\$0	\$53,027
<i>Residential</i>	<i>PY20</i>	<i>1.00</i>	<i>0.77</i>	\$9,300	\$66,073	\$6,650	\$82,023	\$17,089	\$34,389	\$11,903	\$0	\$63,380
<i>Residential</i>	<i>PY21</i>	<i>1.00</i>	<i>0.75</i>	\$10,667	\$79,378	\$6,650	\$96,695	\$19,844	\$38,458	\$14,200	\$0	\$72,502
<i>Residential</i>	<i>PY22</i>	<i>1.00</i>	<i>0.74</i>	\$8,270	\$47,580	\$6,647	\$62,498	\$12,601	\$24,312	\$9,508	\$0	\$46,421
<i>Residential Total</i>		<i>1.00</i>		\$43,248	\$274,384	\$33,245	\$350,877	\$76,672	\$151,705	\$53,695	\$0	\$282,073

Table 13. Residential TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Subprogram	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential	PY18	0.655	0.86	\$7,060	\$22,078	\$6,649	\$35,787	\$8,459	\$16,672	\$5,495	\$0	\$30,626
Residential	PY19	0.655	0.85	\$7,952	\$26,048	\$6,649	\$40,649	\$9,323	\$19,067	\$6,354	\$0	\$34,743
Residential	PY20	0.655	0.74	\$9,300	\$40,085	\$6,650	\$56,034	\$11,196	\$22,532	\$7,799	\$0	\$41,527
Residential	PY21	0.655	0.72	\$10,667	\$48,331	\$6,650	\$65,648	\$13,002	\$25,198	\$9,304	\$0	\$47,503
Residential	PY22	0.655	0.70	\$8,270	\$28,323	\$6,647	\$43,240	\$8,256	\$15,929	\$6,230	\$0	\$30,415
Residential Total		0.655		\$43,248	\$164,865	\$33,245	\$241,358	\$50,236	\$99,397	\$35,181	\$0	\$184,814

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings.

Other Information Deemed Appropriate

Refer to Section 9.1.4 for information about the hybrid heat pump load shifting pilot that will be implemented through the residential CSP.

Residential HER Program (2026-2031)

The Residential HER program is divided into two subprograms, one for market-rate customers and one for low-income customers. This section describes the Residential (market rate) HER subprogram, while Section 3.2.1 describes the Low-Income HER subprogram.

Objectives

The Residential HER program's objective is to reduce a home's energy use through HERs and access to online tools where customers can view various aspects of their energy use over time. This program leverages the power of social norms and education "coaching" to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market include PECO residential electric customers that do not qualify as low-income. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers. Outreach for the non-low income HER program will leverage usage-based targeting approaches, including identification of customers with higher electricity usage.

Program Description

The Residential HER program involves regularly delivering direct mail or emailed HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other Phase V energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, all customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor comparison). The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The purpose of the website is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Residential HER program may also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP would provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (and why it matters). Communications would include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP would promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Residential HER program does not contain any components.

Coordination of Participation in other Act 129 programs

HERs will include marketing opportunities for cross-promoting other PECO Phase V Act 129 programs.

Implementation Strategy

The Residential HER program will be implemented by a CSP. The CSP will deliver and manage the website platform and direct mail or digital HERs to customers. HER program participants are grouped in waves, or cohorts. The CSP will launch new waves in addition to maintaining the legacy waves launched prior to Phase V. In Phase V, HER waves will have a multi-year measure life after the first year of deployment for energy and coincident peak demand savings. Savings will persist with a prescribed decay rate during the second year of deployment or later. The CSP will manage participation waves throughout Phase V to address measure life and persistence in accordance with the multiyear measure life framework and PECO's goals.

Program Issues and Risks and Risk Mitigation

The Residential HER program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential HER program have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

A minimal ramp up will be needed for the Residential HER program because this program is already operating in Phase IV. A longer ramp-up would be needed for the Peak Demand and Rate Education pieces, as they are new customer experiences.

Marketing Strategy

The Residential HER program participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

The program measure is the delivery of direct mail or digital HERs to customers. Customers are selected for the program and can choose to opt-out at any time. No incentives are paid to the customers.

Table 14. HER Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Home Energy Reports	per home	No	Yes	Phase V TRM	-	4 ²⁸	-

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Residential HER program.

Maximum Deadlines for Rebates

Rebates are not applicable to the Residential HER program.

Key Schedule Milestones

The planned implementation schedule follows:

- **March 2026:** PECO and the CSP will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems are in place, and that the randomization of new customers has been reviewed .
- **June 1, 2026:** The program will launch.

²⁸ HER savings experience 31.3% annual decay as outlined in the 2026 TRM and calculated from the [Addendum to Act 129 Home Energy Report Persistence Study](#) - Dated November 2018.

- **June 2026–May 2031:** Program will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V program.

Assumed EM&V

The evaluation methodology and data collection proposed for the program are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO follows the SWE's Evaluation Framework, utilizes a SWE-approved Phase V evaluation plan, and utilizes an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program
- Energy savings associated with customer behavior change
- Program implementation costs

Data for evaluating the program will come from the following sources:

- Tracking system data
- TRM estimates of measure savings persistence
- Surveys of customers who participate in the program
- Program implementer and PECO staff surveys or interviews
- Evaluation of billing data
- Program impacts will be determined using a customer billing data and billing regression analysis.

Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response, includes the following strategies:

- Interviews with utility staff, implementation staff, and customers
- Survey of program participants
- Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections and Estimated Participation

Table 15. HER Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Home Energy Reports	2.7.3	Energy Savings (MWh)	24,698	36,636	26,807	28,172	26,236	142,549
		Summer Demand Reduction (MW)	4.2	10.5	7.9	6.7	5.9	35.3
		Winter Demand Reduction (MW)	3.8	8.3	6.4	5.9	4.7	29.1
		Projected Participation	456,000	389,100	401,000	383,400	469,900	469,900

Estimated Program Budget (Total) by Year

Table 16. HER Program Budget

Subprogram Name:		HER					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989

	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential HER program participates in the residential sector. The Residential HER program accounts for 10.2% of residential sector spending exclusive of common cost allocation.

Table 17. HER Summary of EE&C Costs

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost(\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other				
Residential Portfolio	HER	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512

Cost Effectiveness

Table 18. HER TRC Benefits (Gross)

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Subprogram	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
HER	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
HER	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
HER	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
HER	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
HER	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
HER Total		1.00		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862

Table 19. HER TRC Benefits (Net)

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Subprogram	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
HER	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
HER	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
HER	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631

<i>HER</i>	<i>PY21</i>	<i>1.000</i>	<i>3.88</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,783</i>	<i>\$2,783</i>	<i>\$4,006</i>	<i>\$6,795</i>	<i>\$0</i>	<i>\$0</i>	<i>\$10,801</i>
<i>HER</i>	<i>PY22</i>	<i>1.000</i>	<i>3.52</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,590</i>	<i>\$2,590</i>	<i>\$3,115</i>	<i>\$6,000</i>	<i>\$0</i>	<i>\$0</i>	<i>\$9,116</i>
<i>HER Total</i>		<i>1.000</i>		<i>\$0</i>	<i>\$0</i>	<i>\$13,989</i>	<i>\$13,989</i>	<i>\$22,684</i>	<i>\$40,177</i>	<i>\$0</i>	<i>\$0</i>	<i>\$62,862</i>

Summary of Benchmarking Results

As mentioned earlier in this section, PECO conducted benchmarking against similar utilities to inform the budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Residential HER program, PECO will continue to engage existing customers and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

3.2.1 Residential Low-Income Sub-Sector Programs

The Residential program and Residential HER program both include low-income subprograms. These subprograms are described below.

Residential Low-Income Subprogram Components (2026-2031)

Objectives

All Residential customers, including Residential Low-Income customers, will have access to all components included in the Residential Program described in Section 3.2.

The objective of the Residential Low-Income subprogram is to increase energy efficiency and address health and safety barriers for low-income customers in single family homes. The subprogram will also serve low-income customers in multifamily buildings in which 66% of occupants have a household income of less than or equal to 150% of the federal poverty level. PECO will meet this objective by:

- Aiming to reduce household energy costs for residential customers with a household income less than or equal to 150% of federal poverty level.
- Delivering no-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.
- Targeting high-impact, low-income multifamily sites for complementary direct-install projects and comprehensive retrofits with more favorable incentives.
- Addressing health and safety barriers in single family low-income homes to enable installation of energy efficiency measures and improve overall comfort and well-being. PECO has allocated \$3,000,000 for health and safety measures for low-income customers.

Target Market

- **Low-Income Single Family:** Includes PECO residential electric customers that are individually metered, regardless of building type, with a household income of less than or equal to 150% of the federal poverty level. This customer population includes low-

income customers living in single family housing or low-income customers living in multifamily housing that are individually metered. While these customers have similar usage patterns to non-low-income customers, homes may be more likely to need health and safety improvements prior to energy efficiency measure installation. When implementing components for low-income customers, the CSP will incorporate health and safety measures into the component offerings.

- **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls.
 - **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval of comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.
- **Low-Income Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit and at least 66% of the occupants have a household income of less than or equal to 150% of the federal poverty level. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential Low-Income subprogram components are designed to offer PECO's low-income customers meaningful opportunities to save energy. For additional detail concerning the program's comprehensive design and delivery, please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

The Residential Low-Income subprogram components include:

- **Low-Income Single Family:** Enhances energy efficiency in single family homes for eligible customers, reducing electric bills and increasing comfort. All measures are fully subsidized. Offers free energy checkups, either in person or virtual, that include a home inspection, energy usage analysis, direct-install measures, and an energy education

session, including information, when finalized, on the energy efficiency benefits of heat pumps, followed by a custom report. Also provides free electric heating assessments, which add air flow diagnostics, infrared testing, building analysis, and combustion safety checks when appropriate. Units in individually metered multifamily buildings are served through this component as well. In addition, if the energy auditor identifies a customer who is potentially eligible for Rate RH, in accordance with PECO's Tariff, the technician will provide that customer with information about specific requirements for switching to Rate RH.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups, if a suitable vendor is obtained to provide pick up services. Encourages participation in other Residential programs.
- **New Construction:** Promotes building affordable housing that is more comfortable, durable, and energy efficient than those built to code. Collaborates with HERS raters and builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, EV managed charging, battery storage, water heaters) and behavioral measures, which may include TOU rates for eligible PECO customers.
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

The Residential CSP will administer the Residential Low-Income subprogram components with a team of partners that have a proven record of providing the services offered in this program. The implementation strategy will vary by program component:

- **Low-Income Single Family:** The CSP will offer two appointment types for customers:
 - **Free Energy Checkups** include an in-depth inspection of the home, energy use analysis and recommendations, direct-install measures, and an energy education session followed by a customer report and education materials.
 - **Free Energy Check Up Plus Assessments** will include all elements of the Free Energy Checkup and will incorporate an in-depth building science approach that mirrors PECO LIURP and meets BPI standards. The assessment will include air flow diagnostics, infrared testing, building analysis, and combustion safety checks when appropriate. Only low-income customers who have permanently installed electric systems are eligible for the Free Energy Check Up Plus appointment; all other low-income customers are eligible for the Free Energy Check Up appointment.

- **Appliance Recycling:** The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners, and dehumidifiers. An additional option will be available for customers to drop off regular household sized refrigerators and freezers at a designated location. After the event, the CSP will verify income eligibility of participating customers and will help facilitate scheduling of Free Energy Check Up assessments for customers who affirmatively opt in.
- **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters. The CSP will target outreach within low-income communities by partnering with affordable housing developers, community-based organizations, and local stakeholders.
- **DLS:** The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:
- **Managed EV Charging** to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.
- **Thermostat Optimization** to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.
- **A Bring Your Own Battery** offering that will discharge batteries to lower grid demand during peak periods. The offerings will enroll existing residential battery systems to leverage existing infrastructure rather than providing incentives for new battery installation.
- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

In addition to the program issues and risks and risk mitigation described in Section 3.2, PECO anticipates potential risks concerning changes to federal program funding for low-income programs including LIHEAP and WAP. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential Low-Income subprogram have anticipated costs of \$0 for Phase V after incentives.

Ramp-Up Strategy

Minimal ramp up will be needed for the Residential Low-Income subprogram components because the Single Family, New Construction, and Appliance Recycling components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential Low-Income subprogram components. PECO will incorporate energy efficiency education into existing CAP outreach events to generate awareness about Act 129 and other PECO assistance programs within 180 days of the start of Phase V.

- **Low-Income Single Family:** Emails, direct mail, outbound calls, social media and digital ads, direct engagement at food banks, social service centers, and community events
- **Appliance Recycling:** Emails, bill inserts, social media, cross-promotions with municipal recycling events
- **New Construction:** Direct builder outreach, education events and partnerships with trusted associations (i.e., home building associations, housing authorities, community developers), and technical assistance, case studies, and collaboration with manufacturers
- **DLS:** Co-branded marketing (i.e., thermostats, EV chargers and batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; and newsletters

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC (heat pump, ductless mini-splits, central ACs), appliances, shell (attic insulation, air sealing), duct sealing and insulation, water heating (heat pump water heaters), and plug loads. All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Table 20. Residential Low-Income Subprogram Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁹	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
High Efficiency Equipment: ASHP	per unit	Yes	Yes	Phase V TRM	\$2,685.98	15	\$0.00 - \$10,000.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	per heat pump	Yes	Yes	Phase V TRM	\$2,146.33	15	\$0.00 - \$16,000.00
Room Air Conditioners	per room A/C	Yes	Yes	Phase V TRM	\$510.46	9	\$0.00 - \$600.00
Duct Sealing & Duct Insulation	per home	Yes	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$600.00
Residential Air Sealing	per home	Yes	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	Yes	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$1,800.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	Yes	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$660.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	per home	Yes	Yes	Phase V TRM	\$700.00	15	\$0.00 - \$700.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 - \$1,800.00
Basement or Crawl Space Wall Insulation	per home	Yes	Yes	Phase V TRM	\$155.63	15	\$0.00 - \$550.00
Heat Pump Water Heaters	per water heater	Yes	Yes	Phase V TRM	\$3,364.09	10	\$0.00 - \$3,600.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	Yes	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
WH LI > 10% UBC \$0.40/kWh	per home	Yes	Yes	Phase V TRM	\$1,100.00	15	\$0.00 - \$1,100.00
HVAC Systems: PTAC	per PTAC	Yes	Yes	Phase V TRM	\$1,571.00	15	\$0.00 - \$1,571.00
HVAC Systems: PTHP	per PTHP	Yes	Yes	Phase V TRM	\$2,094.00	15	\$0.00 - \$2,094.00
Residential New Construction	per home	Yes	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
ENERGY STAR Manufactured Homes	per home	Yes	Yes	Phase V TRM	\$1,984.87	15	\$0.00 - \$1,984.87
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation	per home	Yes	No	Phase V TRM	\$350.00	15	\$0.00 - \$350.00
Dehumidifier Retirement	per dehumidifier	Yes	No	Phase V TRM	\$10.00	4	\$0.00 - \$10.00

²⁹ PECO applied the definition for comprehensive measure from Table 8 Addendum from the Final Act 129 Phase V EE&C Plan Template Tables Workbook, available at: [Energy Efficiency and Conservation \(EE&C\) Program | PA PUC](#) and specifically here: [1894161.xlsx](#)

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁹	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	Yes	No	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling with and without Replacement	per refrigerator	Yes	No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Room AC (RAC) Retirement	per room A/C	Yes	No	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	Yes	No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	Yes	No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Refrigerator / Freezer Recycling - LIURP & WRx	per refrigerator	Yes	No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	Yes	No	Phase V TRM	\$4.40	2	\$0.00 - \$4.40
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	Yes	No	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	Yes	No	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	Yes	No	Phase V TRM	\$2.60	8	\$0.00 - \$3.25
Low-Flow Faucet Aerators: Direct install	per aerator	Yes	No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	Yes	No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	Yes	No	Phase V TRM	\$41.75	15	\$0.00 - \$42.00
Water Heater Pipe Insulation	per water heater	Yes	No	Phase V TRM	\$59.80	11	\$0.00 - \$59.80
Water Heater Tank Wrap	per tank	Yes	No	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	Yes	No	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	Yes	No	Phase V TRM	\$56.50	5	\$0.00 - \$60.00
ENERGY STAR Certified Connected Thermostats	per thermostat	Yes	No	Phase V TRM	\$168.42	9	\$0.00 - \$300.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁹	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Air Conditioner & Heat Pump Maintenance	per unit	Yes	No	Phase V TRM	\$141.40	3	\$0.00 - \$350.00
ENERGY STAR Air Purifiers - Direct Install LI & MF	per air purifier	Yes	No	Phase V TRM	\$200.00	9	\$0.00 - \$300.00
Customer Education: Adjust Thermostat	per home	Yes	No	Phase V TRM	\$20.00	1	\$0.00 - \$20.00
Customer Education: Shorter Showers	per home	Yes	No	Phase V TRM	\$15.00	1	\$0.00 - \$15.00
Customer Education: Wash Laundry in Cold Water	per home	Yes	No	Phase V TRM	\$15.00	1	\$0.00 - \$15.00
Health & Safety	per audit	Yes	No	Phase V TRM	\$1,000.00	1	\$0.00 - \$1,000.00
Health & Safety - Devices	per audit	Yes	No	Phase V TRM	\$50.00	1	\$0.00 - \$50.00
Advanced Power Strips: Kit	per advanced power strip	Yes	No	Phase V TRM	\$40.07	5	\$0.00 - \$40.07
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit	per gasket	Yes	No	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit	per door	Yes	No	Phase V TRM	\$26.00	15	\$0.00 - \$26.00
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping: Kit	per door	Yes	No	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
Smart Water Heater Controls	per water heater controller	Yes	No	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
ENERGY STAR Air Purifiers	per air purifier	Yes	No	Phase V TRM	\$66.03	9	\$0.00 - \$66.03
ECM Circulation Fans	per fan	Yes	No	Phase V TRM	\$352.79	5	\$0.00 - \$352.79
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	Yes	No	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep - LIURP & WRx	per door	Yes	No	Phase V TRM	\$26.00	15	\$0.00 - \$26.00
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx	per door	Yes	No	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
LED Exit Signs	per sign	Yes	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	Yes	No	Phase V TRM	\$27.00	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	Yes	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	Yes	No	Phase V TRM	\$97.00	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	Yes	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No) ²⁹	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Lighting: Permanent Fixture Removal	per fixture	Yes	No	Phase V TRM	\$60.00	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	Yes	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	Yes	No	Phase V TRM	\$52.00	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	Yes	No	Phase V TRM	\$76.00	15	\$0.00 - \$250.00
Occupancy Sensor	per sensor	Yes	No	Phase V TRM	\$55.00	8	\$0.00 - \$55.00
Connected Smart Thermostat	per unit	Yes	No	Phase V TRM	\$17.30	1	\$0.00 - \$23.06
Bring Your Own Thermostat (Enrollment Incentive)	per unit	Yes	No	Phase V TRM	\$37.50	1	\$0.00 - \$50.00
Bring Your Own Thermostat	per unit	Yes	No	Phase V TRM	\$26.63	1	\$0.00 - \$35.50
ASHRAE Level 2 Audit	per audit	Yes	No	Phase V TRM	\$4,792.32	1	\$0.00 - \$4,792.32
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam	per can	Yes	No	Phase V TRM	\$11.20	15	\$0.00 - \$11.20
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit	per can	Yes	No	Phase V TRM	\$11.20	15	\$0.00 - \$11.20
Lighting Retrofits - Low Bays	per fixture	Yes	No	Phase V TRM	\$42.88	15	\$0.00 - \$42.88
Lighting Retrofits - High Bays	per fixture	Yes	No	Phase V TRM	\$31.94	15	\$0.00 - \$31.94
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to offer no-cost installation of additional measures that are not listed Table 20 but are identified in the TRM.

Basis for the Proposed Incentive Levels

All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Maximum Deadlines for Rebates

As Residential Low-Income subprogram direct-installation measures are provided at no charge, an application deadline is not applicable to this subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Residential Low-Income subprogram components after meeting its low-income carve-out subject to the Commission-approved budget for the program.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the Residential Low-Income subprogram components through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Table 21. Residential Low-Income Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Dehumidifier Retirement</i>	2.4.12	Energy Savings (MWh)	20	20	21	22	17	100
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	20	20	21	22	17	100
<i>Low-Capacity Refrigerator / Freezer Recycling without Replacement</i>	2.4.4	Energy Savings (MWh)	2	2	2	2	1	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	6	6	6	7	5	30
<i>Refrigerator / Freezer Recycling with and without Replacement</i>	2.4.3	Energy Savings (MWh)	210	216	227	238	188	1,079
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	268	275	289	303	240	1,375
<i>Room AC (RAC) Retirement</i>	2.2.8	Energy Savings (MWh)	76	78	82	86	68	389
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	585	600	630	660	525	3,000
<i>Low-Flow Faucet Aerators: Kit</i>	2.3.6	Energy Savings (MWh)	567	567	567	567	567	2,833
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation	36,001	36,001	36,001	36,001	36,001	180,005
<i>Low-Flow Showerheads: Kit</i>	2.3.7	Energy Savings (MWh)	303	303	303	303	303	1,516
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Projected Participation	18,001	18,001	18,001	18,001	18,001	90,005
<i>Refrigerator / Freezer Recycling - LIURP & WRx</i>	2.4.3	Energy Savings (MWh)	314	314	314	314	314	1,570
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	400	400	400	400	400	2,000
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)</i>	2.1.1	Energy Savings (MWh)	3,157	3,236	3,394	3,473	2,526	15,785
		Summer Demand Reduction (MW)	0.4	0.4	0.5	0.5	0.3	2.2
		Winter Demand Reduction (MW)	0.3	0.4	0.4	0.4	0.3	1.7
		Projected Participation	76,000	77,900	81,700	83,600	60,800	380,000
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))</i>	2.1.1	Energy Savings (MWh)	557	571	599	613	446	2,786
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation	17,100	17,528	18,383	18,810	13,680	85,501

Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Energy Savings (MWh)	334	343	359	368	267	1,672
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.1	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	7,600	7,790	8,170	8,360	6,080	38,000
LED and Electroluminescent Nightlights	2.1.3	Energy Savings (MWh)	3	3	3	3	2	15
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	760	779	817	836	608	3,800
Low-Flow Faucet Aerators: Direct install	2.3.6	Energy Savings (MWh)	221	225	235	240	182	1,103
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	3,925	4,011	4,182	4,267	3,241	19,626
Low-Flow Showerheads: Direct install	2.3.7	Energy Savings (MWh)	169	172	178	180	147	847
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	2,614	2,657	2,742	2,785	2,272	13,070
Thermostatic Shower Restriction Valves	2.3.8	Energy Savings (MWh)	11	11	12	12	9	54
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	372	381	398	406	304	1,861
Water Heater Pipe Insulation	2.3.5	Energy Savings (MWh)	738	754	786	802	609	3,689
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.1	0.7
		Projected Participation	1,740	1,778	1,854	1,892	1,436	8,700
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh)	27	28	29	30	22	136
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	380	390	409	418	304	1,901
Advanced Power Strips	2.5.1	Energy Savings (MWh)	40	41	43	44	32	200
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	456	467	490	502	365	2,280
ENERGY STAR Certified Connected Thermostats	2.2.12	Energy Savings (MWh)	106	108	110	112	95	532
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	289	293	300	304	259	1,445
High Efficiency Equipment: ASHP	2.2.1	Energy Savings (MWh)	66	67	71	72	53	329

		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	54	55	58	59	43	269
		Energy Savings (MWh)	92	94	99	101	74	459
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	2.2.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	107	110	115	118	86	536
		Energy Savings (MWh)	28	28	28	28	28	139
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
Room Air Conditioners	2.2.7	Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1,101	1,101	1,101	1,101	1,101	5,505
		Energy Savings (MWh)	118	119	122	123	107	590
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
Air Conditioner & Heat Pump Maintenance	2.2.6	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	375	379	388	392	341	1,875
		Energy Savings (MWh)	3	3	3	3	2	14
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Duct Sealing & Duct Insulation	2.2.10	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	10	10	11	11	8	50
		Energy Savings (MWh)	669	674	682	686	636	3,347
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	1.6
Residential Air Sealing	2.6.1	Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Projected Participation	1,210	1,218	1,233	1,240	1,150	6,051
		Energy Savings (MWh)	405	413	431	440	333	2,023
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	2.6.3	Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.1	0.7
		Projected Participation	227	232	242	247	187	1,135
		Energy Savings (MWh)	77	79	83	85	62	386
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	2.6.3	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	70	72	75	77	56	350
		Energy Savings (MWh)	36	37	39	40	29	180
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	2.6.3	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	70	72	75	77	56	350
		Energy Savings (MWh)	13	13	14	14	10	62
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	2.6.3	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	14	14	15	15	11	69
		Energy Savings (MWh)	1	1	1	1	1	5
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Basement or Crawl Space Wall Insulation	2.6.4	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
ENERGY STAR Air Purifiers - Direct Install LI & MF	2.4.14	Energy Savings (MWh)	1,891	1,938	2,033	2,080	1,513	9,456
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.3	0.2	1.2
		Winter Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.2	1.5
		Projected Participation	6,515	6,678	7,004	7,167	5,212	32,576
		Energy Savings (MWh)	790	796	805	808	754	3,954
Heat Pump Water Heaters	2.3.1	Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.1	0.8
		Projected Participation	440	443	448	450	420	2,201
		Energy Savings (MWh)	228	234	245	251	182	1,140
Customer Education: Adjust Thermostat	2.9.1	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	7,600	7,790	8,170	8,360	6,080	38,000
		Energy Savings (MWh)	114	117	123	125	91	570
Customer Education: Shorter Showers	2.9.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	7,600	7,790	8,170	8,360	6,080	38,000
		Energy Savings (MWh)	266	273	286	293	213	1,330
Customer Education: Wash Laundry in Cold Water	2.9.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	7,600	7,790	8,170	8,360	6,080	38,000
		Energy Savings (MWh)	-	-	-	-	-	-
Health & Safety	N/A	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	390	400	420	440	350	2,000
		Energy Savings (MWh)	-	-	-	-	-	-
Health & Safety - Devices	N/A	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	3,900	4,000	4,200	4,400	3,500	20,000
		Energy Savings (MWh)	1,339	1,339	1,339	1,339	1,339	6,696
Advanced Power Strips: Kit	2.5.1	Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.8
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.1
		Projected Participation	18,000	18,000	18,000	18,000	18,000	90,000
		Energy Savings (MWh)	0	0	0	0	0	0
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit	2.6.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit	2.6.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	0.0	0.0	0.0	0.0	0.0	0.0

		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	5	5	5	5	5	27
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	151	151	151	151	151	755
		Energy Savings (MWh)	34	34	34	34	34	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	192	192	192	192	192	960
		Energy Savings (MWh)	2	2	2	2	2	11
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	11	11	11	11	11	55
		Energy Savings (MWh)	124	124	124	124	124	622
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	206	206	206	206	206	1,030
		Energy Savings (MWh)	7	7	7	7	7	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1,100	1,100	1,100	1,100	1,100	5,500
		Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	200	200	200	200	200	1,000
		Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	53	53	53	53	53	265
		Energy Savings (MWh)	300	300	300	300	300	1,500
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Projected Participation	400	400	400	400	400	2,000
		Energy Savings (MWh)	698	715	750	768	558	3,489
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	16,800	17,220	18,060	18,480	13,440	84,000

Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Energy Savings (MWh)	2	2	2	2	1	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	53	54	56	58	42	263
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Energy Savings (MWh)	37	38	40	41	30	185
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	840	861	903	924	672	4,200
LED and Electroluminescent Nightlights	2.1.3	Energy Savings (MWh)	2	2	2	2	1	8
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	420	431	452	462	336	2,101
Low-Flow Faucet Aerators: Direct install	2.3.6	Energy Savings (MWh)	47	48	51	52	38	236
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	840	861	903	924	672	4,200
Low-Flow Showerheads: Direct install	2.3.7	Energy Savings (MWh)	27	28	29	30	22	136
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	420	431	452	462	336	2,101
Low Income Home Energy Reports	2.7.3	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	-	-	-	-
Thermostatic Shower Restriction Valves	2.3.8	Energy Savings (MWh)	2	3	3	3	2	12
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	84	86	90	92	67	419
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh)	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Advanced Power Strips	2.5.1	Energy Savings (MWh)	9	9	10	10	7	46
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	105	108	113	116	84	526
LED Exit Signs	3.1.4	Energy Savings (MWh)	38	39	41	43	34	194

		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	131	135	142	149	118	675
		Energy Savings (MWh)	46	47	50	52	42	237
Lighting Retrofits - Other Interior Fixtures	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	211	216	227	238	189	1,081
		Energy Savings (MWh)	158	162	170	178	142	809
Lighting Retrofits - Outdoor floods	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	264	270	284	297	237	1,352
		Energy Savings (MWh)	57	59	62	65	52	295
Lighting Retrofits - Parking Garage	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	79	81	85	90	72	407
		Energy Savings (MWh)	170	174	183	192	153	873
Lighting Retrofits - Parking Lot	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	264	270	284	297	237	1,352
		Energy Savings (MWh)	933	957	1,005	1,053	837	4,786
Lighting: Permanent Fixture Removal	3.1.1	Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Projected Participation	2,628	2,695	2,830	2,965	2,358	13,476
		Energy Savings (MWh)	130	133	140	147	117	666
Linear LED: Lamp Replacement	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	3,942	4,043	4,245	4,447	3,538	20,215
		Energy Savings (MWh)	47	48	50	53	42	239
Linear LED: Retrofit Fixture, surface mount	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	264	270	284	297	237	1,352
		Energy Savings (MWh)	68	70	74	77	61	351
Linear LED: Retrofit Fixture, troffer	3.1.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	264	270	284	297	237	1,352
		Energy Savings (MWh)	8	8	9	9	7	42
Occupancy Sensor	2.1.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	66	68	72	75	59	340
		Energy Savings (MWh)	63	65	68	69	50	315
Customer Education: Adjust Thermostat	N/A	Summer Demand Reduction (MW)	-	-	-	-	-	-

		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	2,100	2,153	2,258	2,310	1,680	10,501
Customer Education: Shorter Showers	N/A	Energy Savings (MWh)	32	32	34	35	25	158
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2,100	2,153	2,258	2,310	1,680	10,501
		Energy Savings (MWh)	74	75	79	81	59	368
Customer Education: Wash Laundry in Cold Water	N/A	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2,100	2,153	2,258	2,310	1,680	10,501
		Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
HVAC Systems: PTAC	2.2.1	Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	140	144	151	154	112	701
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
HVAC Systems: PTHP	2.2.1	Projected Participation	40	41	43	44	32	200
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Low-Flow Faucet Aerators: Kit	2.3.6	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
Low-Flow Showerheads: Kit	2.3.7	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Power Strips: Kit	2.5.1	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
		Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
Connected Smart Thermostat	Load Shifting Measure	Projected Participation	945	1,011	1,081	1,157	1,238	5,432
		Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	100	-	-	-	-	100
Bring Your Own Thermostat (Enrollment Incentive)	Load Shifting Measure	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	100	-	-	-	-	100
		Energy Savings (MWh)	-	-	-	-	-	-
Bring Your Own Thermostat	Load Shifting Measure	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	0.0	0.0	0.0	0.0	0.0	0.1

		Projected Participation	100	100	100	100	100	500
ASHRAE Level 2 Audit	Audit	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	4	4	4	4	4	20
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam	2.6.2	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Residential New Construction	2.7.1	Energy Savings (MWh)	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
ENERGY STAR Manufactured Homes	2.7.2	Energy Savings (MWh)	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit	2.6.2	Energy Savings (MWh)	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation	2.6.3	Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Lighting Retrofits - Low Bays	3.1.1	Energy Savings (MWh)	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Lighting Retrofits - High Bays	3.1.1	Energy Savings (MWh)	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5

Estimated Program Budget (Total) by Year

Table 22. Residential Low-Income Subprogram Budget

Program Name:		Residential Low-Income					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$11,001	\$11,185	\$11,553	\$11,778	\$9,689	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$641	\$641	\$641	\$641	\$641	\$3,205
	Direct-Install Materials & Labor	\$6,791	\$6,964	\$7,302	\$7,497	\$5,532	\$34,086
	Braided Funding Support Labor	\$15	\$15	\$15	\$15	\$15	\$77
	Incentive Total	\$7,981	\$8,152	\$8,493	\$8,691	\$6,722	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167
Percent Incentives		73%	73%	74%	74%	69%	73%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential Low-Income subprogram components offer incentives to customers in the residential sector. The Residential Low-Income subprogram components account for 34.1% of residential sector spending, as well as 4.0% of SCI and 3.7% of LCI spending exclusive of common cost allocation

Table 23. Residential Low-Income Subprogram Summary of EE&C Costs

Sector	EE&C Subprogram	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM & V	AEPS Registration Support	Other				
Residential (incl. Low-Income)	Low-Income Energy Efficiency	\$34,157,402	\$0	\$0	\$0	\$9,219,670	\$3,073,225	\$0	\$0	\$0	\$46,450,297	\$730	\$157	\$4,614,121
SCI	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
LCI	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
Sector Totals	Low-Income Energy Efficiency	\$40,040,235	\$0	\$0	\$0	\$11,375,020	\$3,791,675	\$0	\$0	\$0	\$55,206,930	\$692	\$136	\$4,308,555

Cost-Effectiveness

Table 24. Residential Low-Income Subprogram TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)				
	Program	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost Paid by EDC	Incremental Measure Cost Paid by Participants	Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
Low-Income		PY18	1.00	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income		PY19	1.00	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income		PY20	1.00	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
Low-Income		PY21	1.00	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income		PY22	1.00	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Total			1.00		\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552

Table 25. Residential Low-Income Subprogram TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)				
	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Low-Income</i>	<i>PY18</i>	<i>1.000</i>	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
<i>Low-Income</i>	<i>PY19</i>	<i>1.000</i>	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
<i>Low-Income</i>	<i>PY20</i>	<i>1.000</i>	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
<i>Low-Income</i>	<i>PY21</i>	<i>1.000</i>	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
<i>Low-Income</i>	<i>PY22</i>	<i>1.000</i>	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
<i>Low-Income Total</i>		<i>1.000</i>		\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings. Additionally, PECO will implement focused marketing and incentive structures to reach historically underserved populations, aligning with Act 129 equity objectives and promoting broad participation across all customer segments.

Other Information Deemed Appropriate

Within 180 days of the start of Phase V PECO will add information to the existing CAP Maximum Credit Notification letters sent to CAP customers about how customers can access PECO's website to obtain information regarding Act 129 energy efficiency measures available to low-income customers. PECO will coordinate with Community-Based Organizations (CBOs) in its service territory to provide training and materials regarding Act 129 Low-Income Subprogram offerings.

Residential Low-Income HER Subprogram (2026-2031)

The Residential HER Program includes a specified subprogram for low-income customers. Section 3.2 describes the Residential (market rate) HER program and the Low-Income HER subprogram is described below. PECO will not count savings generated by the Low-Income HER Subprogram towards the Phase V low-income carveout.

Objectives

The Low-Income HER subprogram objective is to reduce a home's energy use through HERs and online access where customers can view their home energy usage. This program leverages the power of social norming to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market for the Low-Income HER subprogram includes all PECO residential electric customers with a household income of less than or equal to 150% of the federal poverty level.

Program Description

The Low-Income HER subprogram involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and

neighborhood comparisons, and energy savings recommendations (including low- or no-cost tips) based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor comparison). The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The website's purpose is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Low-Income HER subprogram will also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP will provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (any why it matters). Communications will include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP will promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Low-Income HER subprogram does not contain any components.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

A CSP will implement the Low-Income HER subprogram. The CSP will deliver direct mail or digital HERs to customers. It will also manage the website platform.

Program Issues and Risks and Risk Mitigation

The Low-Income HER subprogram will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Low-Income HER subprogram have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

Minimal ramp up will be needed for the Low-Income HER subprogram because this program is already operating in Phase IV.

Marketing Strategy

The Low-Income HER subprogram participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

Table 26. Residential Low-Income HER Subprogram

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Low-Income Home Energy Reports	per home	Yes	Yes	Phase V TRM	-	4	-

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Low-Income HER subprogram.

Maximum Deadlines for Rebates

Rebates are not applicable to the Low-Income HER subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The program will launch.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Low-Income HER subprogram after meeting its low-income carve-out subject to the Commission-approved budget for the Low-Income HER subprogram.

Assumed EM&V

See Residential HER Program Assumed EM&V in Section 3.2

Administrative Requirements

PECO will administer the Low-Income HER subprogram through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Table 27. Residential Low-Income HER Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Low-Income Home Energy Reports	2.7.3	Energy Savings (MWh)	1,815	913	969	860	817	5,374
		Summer Demand Reduction (MW)	0.4	0.2	0.2	0.2	0.2	1.1
		Winter Demand Reduction (MW)	0.3	0.2	0.2	0.2	0.2	1.0
		Projected Participation	3,000	3,000	3,000	3,000	3,000	15,000

Estimated Program Budget (Total) by Year

Table 28. Residential Low-Income HER Subprogram Budget

Sub-Program Name:		Low-Income HER					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524

	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$172	\$91	\$95	\$85	\$81	\$524
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Low-Income HER program participates in the residential sector. The Low-Income HER program accounts for 0.4% of residential sector spending exclusive of common cost allocation.

Table 29. Residential Low-Income HER Subprogram Budget

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other				
Residential Portfolio (incl. Low-Income)	<i>Low-Income Home Energy Reports</i>	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339

Cost-Effectiveness

Table 30. Residential Low-Income HER Subprogram TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income	PY18	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income	PY19	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income	PY20	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income	PY21	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income	PY22	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Total		1.00	7.01	\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669

Table 31. Residential Low-Income HER Subprogram TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income HER	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income HER	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income HER	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648

<i>Low-Income HER</i>	<i>PY21</i>	<i>1.000</i>	<i>6.31</i>	<i>\$0</i>	<i>\$0</i>	<i>\$85</i>	<i>\$85</i>	<i>\$109</i>	<i>\$427</i>	<i>\$0</i>	<i>\$0</i>	<i>\$536</i>
<i>Low-Income HER</i>	<i>PY22</i>	<i>1.000</i>	<i>6.12</i>	<i>\$0</i>	<i>\$0</i>	<i>\$81</i>	<i>\$81</i>	<i>\$94</i>	<i>\$400</i>	<i>\$0</i>	<i>\$0</i>	<i>\$494</i>
<i>Low-Income HER Total</i>		<i>1.000</i>	<i>7.01</i>	<i>\$0</i>	<i>\$0</i>	<i>\$524</i>	<i>\$524</i>	<i>\$772</i>	<i>\$2,897</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,669</i>

Summary of Benchmarking Results

As mentioned in Section 3.2 PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Low-Income HER subprogram, PECO will continue to engage existing customers, enroll additional interested customers, and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

Plan to Meet Proportional Number of Measure Requirement

As part of Phase V program design, PECO confirmed that the Phase V Final Order requirement to set low-income measures at 8.8% was incorporated into its CSP plans. Throughout the program, PECO will actively monitor this metric to maintain compliance.

Confirmation That All Low-Income Compliance Savings Will Come From the Residential Low-Income Subprogram

PECO confirms that its low-income compliance savings will come from the Residential Low-Income Subprogram components. PECO will coordinate closely with its Residential CSP to confirm that any low-income compliance savings are fully verified with participant eligibility confirmed.

Estimate of Applicable Low-Income Carryover Savings From Phase IV

PECO estimates that the low-income savings carryover is 22,295 MWh. The Phase IV compliance goal is 80,089 MWh, and with actual savings of 92,284 MWh with a remaining forecast of 10,780 MWh in PY17.³⁰

3.3 Commercial/Industrial Small Sector

While the SWE separated the C&I sector into small (Section 3.3) and large (Section 3.4) in the Plan template, PECO's Plan has one Non-Residential program in the C&I sector. The Non-Residential program serves both SCI and LCI customers. Section 3.4 includes formatted descriptions of the Non-Residential program components.

³⁰ Per Commission Guidance in the EE&C Phase V Final Order, PECO will cap Phase IV low-income carryover to a maximum of 20% of the Phase V low-income compliance target.

3.4 Commercial/Industrial Large Sector

Non-Residential Program (2026-2031)

Objectives

The Non-Residential program objective is to increase energy efficiency for its non-residential customers across the SCI, LCI, and Municipal Lighting³¹ rate classes. The program uses the following approaches to achieve this objective including:

- Providing customers with easy access to technical support, incentives, and concierge-style services to facilitate program participation and maximize program benefits
- Allowing small businesses to realize the economic benefits of energy efficiency through comprehensive energy efficiency solutions
- Encouraging Non-Residential program customers to make upgrades where they need them most by providing rebates for a wide range of measures

Target Market

PECO's non-residential electric customers include commercial, industrial, government, education, and nonprofit customers. Below are definitions of PECO's SCI and LCI rate classes. At the time of this Plan development, the SCI market size includes approximately 170,000 customers and the LCI market includes approximately 3,000 customers.

SCI rate classes include:

- Rate GS (General Service)

LCI rate classes include:

- Rate PD (Primary Distribution Power)
- Rate HT (High Tension Power)
- Rate EP (Electric Propulsion)

Municipal Lighting rate classes include:

- Rate SL-E (Street Lighting Customer-Owned Facilities)
- Rate SL-C (Smart Lighting Controls Customer-Owned Facilities)
- Rate AL (Alley Lighting in City of Philadelphia)

³¹ The municipal lighting rate class includes streetlighting measures such as pole/arm-mounted roadway or parking lot lighting measures. These measures may be offered to municipalities and homeowner's associations (HOAs) among others.

Program Description

The Non-Residential program offers a comprehensive and cross-cutting array of opportunities so non-residential customers can reduce their energy consumption and costs. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

- **Strategic Energy Management (SEM):** Implements practices, policies, and processes across an organization or facility that create persistent energy savings. Includes the implementation of employee training, new operational protocols, and other interventions that measurably reduce a facility's energy usage.
- **Existing Buildings:** Provides incentives to customers who install energy efficient equipment. Provides downstream and/or midstream incentives for a variety of equipment types including, but not limited to, lighting, HVAC, compressed air, motors and drives.
- **Building Optimization:** Includes assessments and implementing measures to optimize energy use in an existing building. Includes retrocommissioning (RCx), virtual commissioning (VCx), monitoring-based commissioning (MBCx), building tune-up, and Building Operator Certification (BOC) offerings. Additionally, through these assessments, the non-residential CSP will determine whether a customer could benefit from daily load shifting, and implement this savings pathway through the Building Optimization program component.
- **Distributed Energy Resources (DER):** Incentivizes the installation of energy generation and storage systems at customer sites, either behind the meter or with connection to the local grid. This includes, but is not limited to, solar (PV), combined heat and power (CHP), and fuel cell technologies.
- **Small Business Solutions:** Works with small businesses and trade allies to install a prescribed list of energy-saving measures at small business facilities. Includes trade allies who conduct any needed energy assessments and install the eligible measures at customer sites.
- **New Construction:** Partners with design firms and builders to facilitate construction projects (e.g., new facility builds, additions, significant remodels) that are designed, built, and operated at a high level of efficiency from the start. Offers reviews of design documents and onsite assessments for new construction projects, with the implementation of energy-saving measures based on the results.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote and channel customers to other Non-Residential program components based on their facility needs and energy goals.

Implementation Strategy

The Non-Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

- **Strategic Energy Management (SEM):** Delivered through a 12-month cohort model that fosters peer learning, energy awareness, and demand reduction strategies. The CSP will provide comprehensive support including SEM coaches, engineers, and energy modelers. Participants will work with coaches to achieve energy savings through operational and behavioral measures, with additional benefits such as improved safety, sustainability, and facility responsiveness. Participants will graduate out of the component after the first year into the alumni cohort to sustain and expand savings over time.
 - **Virtual SEM (vSEM):** Leverages AMI interval data and analytics to identify savings opportunities remotely and integrate load-shifting strategies to meet peak demand goals.
- **Existing Buildings:** Delivers a comprehensive portfolio of energy efficiency offerings through downstream (including prescriptive and custom offerings) and midstream channels.
 - **Downstream:** focuses on direct customer engagement with technical and trade ally support to facilitate smooth project implementation and timely incentives. The prescriptive pathways will offer streamlined participation and incentives for standard measures, serving as an entry point for engagement. The custom pathway will target complex, site-specific projects including process improvements, chiller plant improvements, compressed air upgrades, load shifting, and more.
 - **Midstream:** reduces barriers by providing instant incentives at the point of sale through distributor networks, expanding beyond lighting to HVAC, refrigeration, and other technologies.
- **Building Optimization:** Delivers deep, persistent energy savings through technical rigor, customer empowerment, and strategic collaboration.
 - **Engineering Support and Audits:** Provides customers with direct access to expert engineering support to help identify, evaluate, and implement energy savings opportunities. Includes ASHRAE Level 2 audits and leverages braided funding opportunities to minimize upfront costs and support customer participation.
 - **BOC:** Delivered in partnership with Penn College of Technology, the BOC offering will provide structured Level I and Level II courses for customers to earn nationally recognized credentials and practical skills to manage building energy use. The CSP will conduct post-class facility assessment to reinforce course content and identify additional savings opportunities.
 - **Building Commissioning (RCx, VCx, MBCx):** Identifies operational savings opportunities through an analysis of interval meter data and engages pre-qualified accounts. Participants will implement recommended measures independently, with no onsite support or financing incentives and the CSP will verify savings through meter-based measurement and verification.
 - **Load Shifting:** Focuses on identifying customers who would benefit from a daily load shifting program outside of PECO's peak hours and engages them through additional outreach. Participating customers will realize savings by enrolling in the

program, with performance verified through meter-based measurement and verification methods outlined by the SWE.

- **Distributed Energy Resources (DER):** Focused primarily on solar PV and CHP projects, the CSP will work closely with solar contractors and PECO's interconnection team to implement the component. The CSP will facilitate AEPS registration for eligible projects, provide guidance, and coordinate with PECO and the PA PUC as needed.
- **Small Business Solutions:** Designed to maximize participation, streamline implementation, and deliver savings, this component will include a vetted trade ally network, direct discount services, localized outreach and engagement, streamlined participation tools, robust QA/quality control (QC), and braided funding. This component includes interest free financing to small and medium sized businesses.
- **New Construction:** Embeds energy efficiency into the design and construction process to support new facility builds, additions, and major renovations across commercial, institutional, and industrial sectors. The CSP will provide design-build services, early engagement with design teams, and technical support such as energy modeling, document reviews, and site assessments.

Program Issues and Risks and Risk Mitigation

Program issues and risks as well as risk mitigation follow the topics outlined in Section 3.2. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Non-Residential program have anticipated costs of \$497,226,292 for Phase V after PECO incentives.

Ramp-Up Strategy

The primary objective is to support a smooth, quick, and seamless transition from Phase IV to Phase V, especially from the perspective of customers and market actors. The CSP will align outreach staff with appropriate customer segments and will capitalize on existing relationships to build on success.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. The CSP will employ a multi-channel strategy and use robust analytics to reach PECO's customer market segments and trade allies with services and measures to meet their specific needs. The CSP will leverage online ads, email, in-person events, existing communication channels, and case studies as some of the primary marketing tactics for the Non-Residential program. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Non-Residential program components.

- **Business Intelligence and Market Segmentation:** Looking at past participation by measures and industry, the CSP will create and deploy targeted direct and digital marketing with measure-specific content to industries that have the greatest propensity to participate in PECO's program.
- **Large Business:** The CSP will implement a data-informed marketing approach to engage large business customers by leveraging customer segmentation and behavioral insights to identify and prioritize large business accounts with the highest potential for impact. The CSP will customize messaging informed by large business customers' challenges and goals to increase participation.
- **Small Business:** The CSP will implement a data-informed marketing strategy to engage small business customers by delivering clear, accessible messaging that highlights the value and ease of participation.
- **Hard-to-Reach and Disadvantaged Small Business Owners:** The CSP will leverage localized, relationship-driven outreach to engage hard-to-reach and disadvantaged small business owners. Outreach will address key barriers including trust, language, awareness, and capacity. The CSP will prioritize direct, in-person engagement through on-site assessment and presence at local events and will collaborate with trusted community organizations and culturally competent trade allies and contractors to reach customers.
- **Trade Allies:** The CSP will support trade allies with sales enablement materials that coordinate with measure-focused campaigns. The CSP will engage and support trade allies through coordinated sales enablement materials aligned with measure-focused campaigns. The CSP will actively recruit trade allies and provide scheduled training and ongoing support to ensure they have the skills and resources necessary to promote the Non-Residential program effectively. Trade allies will serve as key program ambassadors, educating customers on program benefits and driving participation. Continuous communication, mentorship, and field support will be provided to help trade allies enhance their capabilities, maintain high customer satisfaction, and maximize program participation.

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC, water heating, plug load, refrigeration, motors, and others that span all customer classes and building types. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 32. Non-Residential Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Lighting Retrofits - Street lighting	per lighting equipment	No	Phase V TRM	\$276.15	15	\$0.00 - \$276.15
Lighting Retrofits - Outdoor floods	per lighting equipment	No	Phase V TRM	\$132.70	15	\$0.00 - \$146.00
Lighting Retrofits - High Bays	per lighting equipment	No	Phase V TRM	\$520.03	15	\$0.00 - \$520.03
Lighting Retrofits - Other Interior Fixtures	per lighting equipment	No	Phase V TRM	\$104.01	15	\$0.00 - \$104.01
Lighting Controls	per lighting equipment	No	Phase V TRM	\$52.67	8	\$0.00 - \$52.67
LED Exit Signs	per sign	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
LED Refrigeration Display Case Lighting	per case	No	Phase V TRM	\$58.68	8	\$0.00 - \$61.00
HVAC Systems: Air Conditioner	per unit	No	Phase V TRM	\$6,186.04	15	\$0.00 - \$6,186.04
HVAC Systems: Heat Pump	per unit	No	Phase V TRM	\$5,255.65	15	\$0.00 - \$5,255.65
Electric Chillers	per chiller	No	Phase V TRM	\$209,116.51	15	\$0.00 - \$209,116.51
Groundwater Source and Ground Source Heat Pumps	per heat pump	No	Phase V TRM	\$65,910.57	15	\$0.00 - \$65,910.57
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons	per heat pump	No	Phase V TRM	\$1,705.32	15	\$0.00 - \$1,705.32
Small C&I HVAC Refrigerant Charge Correction	per HVAC system	No	Phase V TRM	\$369.32	3	\$0.00 - \$374.00
HVAC Tune Up	per HVAC system	No	Phase V TRM	\$612.90	3	\$0.00 - \$612.90
Room Air Conditioner	per AC	No	Phase V TRM	\$408.37	9	\$0.00 - \$408.37
Controls: Guest Room Occupancy Sensor	per sensor	No	Phase V TRM	\$342.24	11	\$0.00 - \$342.24
Controls: Economizer	per economizer	No	Phase V TRM	\$45.94	3	\$0.00 - \$2,027.00
Computer Room Air Conditioner	per unit	No	Phase V TRM	\$350.00	15	\$0.00 - \$350.00
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	per unit	No	Phase V TRM	\$948.00	15	\$0.00 - \$948.00
Computer Room Air Conditioner/Handler VSD on AC Fan Motors	per HP	No	Phase V TRM	\$1,134.00	15	\$0.00 - \$1,163.00

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Circulation Fan: High-Volume Low-Speed	per fan	No	Phase V TRM	\$4,073.80	15	\$0.00 - \$4,073.80
Demand Controlled Ventilation	per HVAC system	No	Phase V TRM	\$1,923.96	15	\$0.00 - \$1,923.96
Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)	per HVAC system	No	Phase V TRM	\$1,923.96	10	\$0.00 - \$1,923.96
Advanced Rooftop Controls: DCV with two speed controls	per HVAC system	No	Phase V TRM	\$3,339.90	10	\$0.00 - \$3,339.90
Advanced Rooftop Controls: DCV with three speed controls or VFD	per HVAC system	No	Phase V TRM	\$3,884.48	10	\$0.00 - \$3,884.48
C&I ENERGY STAR Certified Connected Thermostats	per thermostat	No	Phase V TRM	\$168.42	11	\$0.00 - \$168.42
Duct Sealing and Insulation	per project	No	Phase V TRM	\$280.64	15	\$0.00 - \$280.64
Chilled Water Pipe Insulation	per insulation project	No	Phase V TRM	\$127.76	15	\$0.00 - \$127.76
Premium Efficiency Motors	per motor	No	Phase V TRM	\$934.02	15	\$0.00 - \$1,034.00
Variable Frequency Drive (VFD) Improvements	per drive	No	Phase V TRM	\$175.51	15	\$0.00 - \$1,216.00
ECM Circulating Fan	per fan	No	Phase V TRM	\$395.48	5	\$0.00 - \$395.48
VSD on Kitchen Exhaust Fan	per unit	No	Phase V TRM	\$533.66	15	\$0.00 - \$533.66
ECM Circulator Pump	per pump	No	Phase V TRM	\$402.69	15	\$0.00 - \$402.69
High Efficiency Pumps	per pump	No	Phase V TRM	\$2,534.53	13.3	\$0.00 - \$2,534.53
Heat Pump Water Heaters	per water heater	No	Phase V TRM	\$1,279.29	10	\$0.00 - \$1,279.29
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs	per sprayer	No	Phase V TRM	\$127.92	8	\$0.00 - \$193.00
Domestic Hot Water Pipe Insulation	per insulation project	No	Phase V TRM	\$29.71	15	\$0.00 - \$63.00
ENERGY STAR Refrigeration Cases	per case	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
ENERGY STAR Freezer Cases	per case	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Cooler	per motor	No	Phase V TRM	\$501.84	15	\$0.00 - \$501.84
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer	per motor	No	Phase V TRM	\$353.45	15	\$0.00 - \$353.45
Controls: Evaporator Fan Controllers	per controller	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Controls: Floating Head Pressure Controls	per control	No	Phase V TRM	\$42,514.74	15	\$0.00 - \$42,514.74
Controls: Anti-Sweat Heater Controls	per door	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Controls: Evaporator Coil Defrost Control	per defrost control	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Variable Speed Refrigeration Compressor	per compressor	No	Phase V TRM	\$5,632.92	15	\$0.00 - \$5,632.92
Strip Curtains for Walk-In Freezers and Coolers	per door	No	Phase V TRM	\$220.33	4	\$0.00 - \$318.00
Night Covers for Display Cases	per case	No	Phase V TRM	\$793.14	5	\$0.00 - \$793.14
Auto Closers	per door	No	Phase V TRM	\$572.76	8	\$0.00 - \$572.76
Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers	per door	No	Phase V TRM	\$2,394.08	12	\$0.00 - \$2,394.08
Suction Pipe Insulation for Walk-In Coolers and Freezers	per insulation project	No	Phase V TRM	\$100.75	11	\$0.00 - \$100.75
Refrigerated Display Cases with Doors Replacing Open Cases	per case	No	Phase V TRM	\$2,288.38	12	\$0.00 - \$2,288.38
Adding Doors to Existing Refrigerated Display Cases	per case	No	Phase V TRM	\$1,816.25	12	\$0.00 - \$1,816.25
Refrigerated Case Light Occupancy Sensors	per controller	No	Phase V TRM	\$35.00	8	\$0.00 - \$35.00
Food Service Equipment Novelty Cooler Shutoff	per controller	No	Phase V TRM	\$303.26	10	\$0.00 - \$303.26
ENERGY STAR Clothes Washer	per washer	No	Phase V TRM	\$676.89	7.1	\$0.00 - \$676.89

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
ENERGY STAR Bathroom Ventilation Fan in Commercial Applications	per fan	No	Phase V TRM	\$300.13	12	\$0.00 - \$300.13
ENERGY STAR Ice Machines	per machine	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Controls: Beverage and Snack Machine Controls	per control	No	Phase V TRM	\$234.30	5	\$0.00 - \$234.30
ENERGY STAR Electric Steam Cooker	per cooker	No	Phase V TRM	\$422.93	12	\$0.00 - \$441.00
ENERGY STAR Combination Oven	per oven	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48
ENERGY STAR Commercial Fryer	per fryer	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55
ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
ENERGY STAR Commercial Dishwasher	per dishwasher	No	Phase V TRM	\$1,093.46	10	\$0.00 - \$1,418.00
ENERGY STAR Commercial Griddle	per griddle	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Commercial Induction Cooktops	per cooktop	No	Phase V TRM	\$1,511.88	10	\$0.00 - \$1,511.88
Wall and Ceiling Insulation	per project	No	Phase V TRM	\$9,235.20	20	\$0.00 - \$9,235.20
Advanced Power Strips	per power strip	No	Phase V TRM	\$56.50	5	\$0.00 - \$56.50
ENERGY STAR Servers	per data center	No	Phase V TRM	\$1,259,232.00	4	\$0.00 - \$1,259,232.00
Server Virtualization	per server	No	Phase V TRM	\$272.22	4	\$0.00 - \$895.00
Cycling Refrigerated Thermal Mass Dryer	per dryer	No	Phase V TRM	\$196.56	10	\$0.00 - \$196.56
Air-Entraining Air Nozzle	per nozzle	No	Phase V TRM	\$159.25	15	\$0.00 - \$160.00
No-Loss Condensate Drains	per drain	No	Phase V TRM	\$308.18	10	\$0.00 - \$308.18
Air Tanks for Load/No Load Compressors	per receiver tank addition	No	Phase V TRM	\$501.22	15	\$0.00 - \$501.22
Variable-Speed Drive Air Compressor	per compressor	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Compressed Air Controller	per controller	No	Phase V TRM	\$177.49	13	\$0.00 - \$177.49
Compressed Air Low Pressure Drop Filters	per filter	No	Phase V TRM	\$1,040.00	10	\$0.00 - \$1,040.00
Compressed Air Mist Eliminators	per air mist eliminator	No	Phase V TRM	\$37.89	5	\$0.00 - \$37.89
Engine Block Heater Timer	per heater timer	No	Phase V TRM	\$16.64	15	\$0.00 - \$76.00
High Frequency Battery Chargers	per charger	No	Phase V TRM	\$402.48	15	\$0.00 - \$402.48
Uninterruptible Power Supply (UPS)	per UPS	No	Phase V TRM	\$46.80	7	\$0.00 - \$46.80
Automatic Milker Takeoffs	per milker takeoff system	No	Phase V TRM	\$20,000.00	10	\$0.00 - \$20,000.00
Dairy Scroll Compressors	per compressor	No	Phase V TRM	\$557.44	15	\$0.00 - \$1,182.00
High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Heat Reclaimers	per heat reclaimer system	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
High Volume Low Speed Fans	per fan	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Livestock Waterer	per livestock waterer system	No	Phase V TRM	\$552.98	10	\$0.00 - \$552.98
Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Low Pressure Irrigation System	per irrigation system	No	Phase V TRM	\$3,000.00	5	\$0.00 - \$3,000.00
New Construction Lighting	Per Project	No	Phase V TRM	\$188,000.00	15	\$0.00 - \$188,000.00
Indoor Horticultural Lighting	per lighting equipment	No	Phase V TRM	\$137.50	7	\$0.00 - \$164.00
High Efficiency Transformer	per transformer	No	Phase V TRM	\$468.00	15	\$0.00 - \$468.00
Midstream lighting incentives - Street lighting	per lighting equipment	No	Phase V TRM	\$85.86	15	\$0.00 - \$85.86
Midstream lighting incentives: Outdoor floods	per lighting equipment	No	Phase V TRM	\$42.75	15	\$0.00 - \$42.75
Midstream lighting incentives: High Bays	per lighting equipment	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Midstream lighting incentives: Other Interior Fixtures	per lighting equipment	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00
HVAC Systems for Midstream Delivery: Air Conditioner	per unit	No	Phase V TRM	\$912.78	15	\$0.00 - \$912.78
HVAC Systems for Midstream Delivery: Heat Pump	per unit	No	Phase V TRM	\$4,824.01	15	\$0.00 - \$4,824.01
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons for Midstream Delivery	per heat pump	No	Phase V TRM	\$2,273.76	15	\$0.00 - \$2,273.76
Midstream Indoor Horticultural Lighting	per lighting equipment	No	Phase V TRM	\$137.50	7	\$0.00 - \$300.00
Midstream Premium Efficiency Motors	per motor	No	Phase V TRM	\$934.02	15	\$0.00 - \$1,000.00
Midstream Variable Frequency Drive (VFD) Improvements	per drive	No	Phase V TRM	\$2,027.14	15	\$0.00 - \$2,027.14
Midstream ENERGY STAR Refrigeration Cases	per case	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
Midstream ENERGY STAR Freezer Cases	per case	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67
Midstream Controls: Evaporator Fan Controllers	per controller	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Midstream Controls: Anti-Sweat Heater Controls	per door	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Midstream Controls: Evaporator Coil Defrost Control	per defrost control	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Midstream ENERGY STAR Ice Machines	per machine	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Midstream ENERGY STAR Electric Steam Cooker	per cooker	No	Phase V TRM	\$422.93	12	\$0.00 - \$1,500.00
Midstream ENERGY STAR Combination Oven	per oven	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
Midstream ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Midstream ENERGY STAR Commercial Fryer	per fryer	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
Midstream ENERGY STAR Commercial Dishwasher	per dishwasher	No	Phase V TRM	\$1,093.46	10	\$0.00 - \$1,093.46
Midstream ENERGY STAR Commercial Griddle	per griddle	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Midstream Air Tanks for Load/No Load Compressors	per receiver tank addition	No	Phase V TRM	\$501.22	15	\$0.00 - \$1,750.00
Midstream Variable-Speed Drive Air Compressor	per compressor	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09
Midstream High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Midstream Heat Reclaimers	per heat reclaimer system	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
Midstream High Volume Low Speed Fans	per fan	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Building Operator Certification Training	per building tune up	No	Phase V TRM	\$4,298.77	13	\$0.00 - \$4,298.77
Custom:Other - SEM	Per Participant	No	Phase V TRM	\$50,000.00	15	\$0.00 - \$50,000.00
Custom:Other - VCx	Per Participant	No	Phase V TRM	\$31,282.01	15	\$0.00 - \$31,282.01
Custom:Other - vSEM	Per Participant	No	Phase V TRM	\$10,000.00	15	\$0.00 - \$10,000.00
Solar	per project	No	Phase V TRM	\$297,602.20	15	\$0.00 - \$297,602.20
Custom:Other - Compressed Air	Per Participant	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Data Center	Per Participant	No	Phase V TRM	\$100,000.00	15	\$0.00 - \$100,000.00

Measure	Unit	Low-Income Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Cusom:HVAC	Per Participant	No	Phase V TRM	\$113,365.00	15	\$0.00 - \$113,365.00
Custom: Motors & Drives	Per Participant	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Other	Per Participant	No	Phase V TRM	\$124,715.00	15	\$0.00 - \$124,715.00
Custom: Process	Per Participant	No	Phase V TRM	\$200,000.00	15	\$0.00 - \$200,000.00
Custom: Refrigeration	Per Participant	No	Phase V TRM	\$60,585.00	15	\$0.00 - \$60,585.00
Custom: EMS	Per Participant	No	Phase V TRM	\$25,000.00	15	\$0.00 - \$25,000.00
Custom: Retrocommissioning	Per Participant	No	Phase V TRM	\$173,280.00	15	\$0.00 - \$173,280.00
Custom: CHP	Per Participant	No	Phase V TRM	\$5,710,026.00	15	\$0.00 - \$5,710,026.00
ASHRAE Audits/Feasibility Studies	Per Participant	No	Phase V TRM	\$10,000.00	5	\$0.00 - \$25,000.00
Incentive Buy Down	Per Participant	No	Phase V TRM	\$15,000.00	5	\$0.00 - \$18,000.00
C&I Load Shifting	per unit	No	Phase V TRM	\$200,000.00	1	\$0.00 - \$200,000.00

To maximize opportunities for customer energy savings, PECO reserves the right to offer an incentive of up to the incremental measure costs³² for any measure that is not listed in Table 32 but is identified in the TRM or approved as an interim measure protocol.

³² The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here [Total Resource Cost Test | PA PUC](#)

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation. Incentives can cover up to 80% of project costs for qualifying measures, reducing ROI periods to 1–5 years and helping overcome financial barriers. Market response will be monitored, and incentive levels adjusted as needed to maintain competitiveness and momentum. Key program components include:

- **Strategic Energy Management:** Lower incentives due to high personal engagement.
- **Small Business Direct Install:** Full funding of installation costs to eliminate financial barriers.
- **New Construction:** Higher upfront incentives to integrate energy efficiency during design.
- **Existing Buildings:** Higher incentives to encourage participation from customers and contractors.
- **Building Optimization:** Lower incentives, similar to SEM, due to personal engagement.
- **Distributed Energy Resources:** Higher incentives due to expensive, complex measure types.

PECO will implement a range of incentive strategies. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted as any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems, and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have five FTEs dedicated to the non-residential sector.

Savings Projections and Participation

Table 33. Non-Residential Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Lighting Retrofits - Street lighting	3.1.1	Energy Savings (MWh)	6,060	6,744	7,348	6,744	5,462	32,358
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	0.8	0.8	0.9	0.8	0.7	4.1
		Projected Participation	5,990	6,666	7,263	6,666	5,398	31,983
Lighting Retrofits - Outdoor floods	3.1.1	Energy Savings (MWh)	6,142	9,846	5,777	5,725	5,528	33,017
		Summer Demand Reduction (MW)	0.2	0.4	0.2	0.2	0.2	1.2
		Winter Demand Reduction (MW)	0.9	1.4	0.8	0.8	0.8	4.6
		Projected Participation	6,711	10,758	6,313	6,255	6,040	36,076
Lighting Retrofits - High Bays	3.1.1	Energy Savings (MWh)	31,344	34,218	35,448	30,718	28,209	159,937
		Summer Demand Reduction (MW)	5.7	6.3	6.5	5.6	5.2	29.3
		Winter Demand Reduction (MW)	4.4	4.8	5.0	4.3	3.9	22.4
		Projected Participation	24,183	26,401	27,350	23,701	21,765	123,399
Lighting Retrofits - Other Interior Fixtures	3.1.1	Energy Savings (MWh)	18,299	19,560	22,025	19,560	16,469	95,913
		Summer Demand Reduction (MW)	3.4	3.6	4.0	3.6	3.0	17.6
		Winter Demand Reduction (MW)	2.6	2.7	3.1	2.7	2.3	13.5
		Projected Participation	198,080	211,738	238,416	211,738	178,272	1,038,244
Lighting Controls	3.1.3	Energy Savings (MWh)	76	138	158	141	115	627
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	629	1,139	1,304	1,169	950	5,190
LED Exit Signs	3.1.4	Energy Savings (MWh)	44	37	40	31	22	174
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	152	129	139	107	77	604
LED Refrigeration Display Case Lighting	3.1.5	Energy Savings (MWh)	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
HVAC Systems: Air Conditioner	3.2.1	Energy Savings (MWh)	15	8	11	8	11	53
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	8	4	6	4	6	28
HVAC Systems: Heat Pump	3.2.1	Energy Savings (MWh)	11	19	37	45	56	168
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	3	5	10	12	15	45
Electric Chillers	3.2.3	Energy Savings (MWh)	110	66	176	44	44	440
		Summer Demand Reduction (MW)	0.1	0.0	0.1	0.0	0.0	0.2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	5	3	8	2	2	20
Groundwater Source and Ground Source Heat Pumps	3.2.4	Energy Savings (MWh)	5	-	2	2	-	9
		Summer Demand Reduction (MW)	0.0	-	0.0	0.0	-	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	0.0	-	0.0
		Projected Participation	2	-	1	1	-	4
		Energy Savings (MWh)	292	565	749	624	412	2,640
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons	3.2.5	Summer Demand Reduction (MW)	0.2	0.4	0.5	0.5	0.3	1.9
		Winter Demand Reduction (MW)	0.2	0.3	0.4	0.3	0.2	1.5
		Projected Participation	168	325	431	359	237	1,520
		Energy Savings (MWh)	7	-	7	-	-	15
Small C&I HVAC Refrigerant Charge Correction	3.2.7	Summer Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Projected Participation	2	-	2	-	-	4
		Energy Savings (MWh)	64	263	297	263	229	1,115
HVAC Tune Up	3.2.8	Summer Demand Reduction (MW)	0.0	0.1	0.2	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.0	0.2
		Projected Participation	155	638	721	638	557	2,709
		Energy Savings (MWh)	0	0	-	0	-	0
Room Air Conditioner	3.2.9	Summer Demand Reduction (MW)	0.0	0.0	-	0.0	-	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	2	1	-	1	-	4
		Energy Savings (MWh)	1	1	1	0	0	3
Controls: Guest Room Occupancy Sensor	3.2.10	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	4	5	5	3	2	19
		Energy Savings (MWh)	-	-	-	20	59	79
Controls: Economizer	3.2.11	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	-	1	3	4
		Energy Savings (MWh)	-	-	14	-	14	27
Computer Room Air Conditioner	3.2.12	Summer Demand Reduction (MW)	-	-	0.0	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	0.0	0.0
		Projected Participation	-	-	6	-	6	12
		Energy Savings (MWh)	-	-	-	-	18	18
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	3.2.13	Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
		Energy Savings (MWh)	-	-	-	-	23	23
Computer Room Air Conditioner/Handler	3.2.14	Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
er VSD on AC Fan Motors		Projected Participation	-	-	-	-	2	2
Circulation Fan: High-Volume Low-Speed	3.2.15	Energy Savings (MWh)	39	44	44	39	29	194
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	8	9	9	8	6	40
Demand Controlled Ventilation	3.2.16	Energy Savings (MWh)	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	4	4
Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)	3.2.17	Energy Savings (MWh)	2	2	-	-	-	4
		Summer Demand Reduction (MW)	0.0	0.0	-	-	-	0.0
		Winter Demand Reduction (MW)	0.0	0.0	-	-	-	0.0
		Projected Participation	1	1	-	-	-	2
Advanced Rooftop Controls: DCV with two speed controls	3.2.17	Energy Savings (MWh)	-	6	6	-	-	13
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	1	1	-	-	2
Advanced Rooftop Controls: DCV with three speed controls or VFD	3.2.17	Energy Savings (MWh)	-	6	-	-	6	13
		Summer Demand Reduction (MW)	-	0.0	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	-	-	0.0	0.0
		Projected Participation	-	1	-	-	1	2
C&I ENERGY STAR Certified Connected Thermostats	3.2.18	Energy Savings (MWh)	1	1	1	1	1	5
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	4	4	4	4	3	19
Duct Sealing and Insulation	3.2.20	Energy Savings (MWh)	2	-	-	2	-	3
		Summer Demand Reduction (MW)	0.0	-	-	0.0	-	0.0
		Winter Demand Reduction (MW)	0.0	-	-	0.0	-	0.0
		Projected Participation	1	-	-	1	-	2
Chilled Water Pipe Insulation	3.2.21	Energy Savings (MWh)	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
Premium Efficiency Motors	3.3.1	Energy Savings (MWh)	-	10	-	-	101	111
		Summer Demand Reduction (MW)	-	0.0	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	-	-	0.0	0.0
		Projected Participation	-	1	-	-	10	11
Variable Frequency Drive	3.3.2	Energy Savings (MWh)	178	237	285	225	178	1,103
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.0	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
(VFD) Improvements		Projected Participation	15	20	24	19	15	93
ECM Circulating Fan	3.3.3	Energy Savings (MWh)	-	-	0	-	-	0
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	2	-	-	2
VSD on Kitchen Exhaust Fan	3.3.4	Energy Savings (MWh)	3	12	12	12	9	49
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	3	11	11	11	8	44
ECM Circulator Pump	3.3.5	Energy Savings (MWh)	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	4	-	-	4
High Efficiency Pumps	3.3.6	Energy Savings (MWh)	-	-	24	-	-	24
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	2	-	-	2
Heat Pump Water Heaters	3.4.1	Energy Savings (MWh)	2	-	-	4	5	11
		Summer Demand Reduction (MW)	0.0	-	-	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	-	-	0.0	0.0	0.0
		Projected Participation	1	-	-	2	3	6
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs	3.4.2	Energy Savings (MWh)	6	6	6	6	6	28
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	3	3	3	3	3	15
Domestic Hot Water Pipe Insulation	3.4.3	Energy Savings (MWh)	-	-	-	1	1	2
		Summer Demand Reduction (MW)	-	-	-	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	0.0	0.0	0.0
		Projected Participation	-	-	-	1	2	3
ENERGY STAR Refrigeration Cases	3.5.1	Energy Savings (MWh)	1	3	3	2	1	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	8	8	6	3	27
ENERGY STAR Freezer Cases	3.5.1	Energy Savings (MWh)	1	4	5	5	2	18
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	6	7	8	3	26
High-Efficiency Evaporator Fan Motors for Walk-	3.5.2	Energy Savings (MWh)	24	31	31	28	24	138
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>In or Reach-In Refrigerated Cases: Cooler</i>		Projected Participation	20	26	26	23	20	115
<i>High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer</i>	3.5.2	Energy Savings (MWh)	4	5	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	21	24	27	24	20	116
<i>Controls: Evaporator Fan Controllers</i>	3.5.3	Energy Savings (MWh)	23	25	27	29	16	119
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	11	12	13	14	8	58
<i>Controls: Floating Head Pressure Controls</i>	3.5.4	Energy Savings (MWh)	-	-	-	-	82	82
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
<i>Controls: Anti-Sweat Heater Controls</i>	3.5.5	Energy Savings (MWh)	4	7	9	7	6	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	3	5	6	5	4	23
<i>Controls: Evaporator Coil Defrost Control</i>	3.5.6	Energy Savings (MWh)	3	6	7	5	2	21
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	3	6	7	5	2	23
<i>Variable Speed Refrigeration Compressor</i>	3.5.7	Energy Savings (MWh)	-	-	-	-	14	14
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
<i>Strip Curtains for Walk-In Freezers and Coolers</i>	3.5.8	Energy Savings (MWh)	4	22	44	20	20	109
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	11	22	10	10	55
<i>Night Covers for Display Cases</i>	3.5.9	Energy Savings (MWh)	-	-	23	-	-	23
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	4	-	-	4
<i>Auto Closers</i>	3.5.10	Energy Savings (MWh)	-	17	27	17	17	77
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Projected Participation	-	8	13	8	8	37
<i>Special Doors with Low or No</i>	3.5.11	Energy Savings (MWh)	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Anti-Sweat Heat for Reach-In Freezers and Coolers		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	3	-	-	3
Suction Pipe Insulation for Walk-In Coolers and Freezers	3.5.12	Energy Savings (MWh)	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	4	4
Refrigerated Display Cases with Doors Replacing Open Cases	3.5.13	Energy Savings (MWh)	-	-	-	-	17	17
		Summer Demand Reduction (MW)	-	-	-	-	(0.0)	(0.0)
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	16	16
Adding Doors to Existing Refrigerated Display Cases	3.5.14	Energy Savings (MWh)	-	-	-	-	11	11
		Summer Demand Reduction (MW)	-	-	-	-	(0.0)	(0.0)
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	16	16
Refrigerated Case Light Occupancy Sensors	3.5.15	Energy Savings (MWh)	-	0	0	-	-	1
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	1	4	-	-	5
Food Service Equipment Novelty Cooler Shutoff	3.5.16	Energy Savings (MWh)	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	2	-	-	2
ENERGY STAR Clothes Washer	3.6.1	Energy Savings (MWh)	-	0	1	0	0	1
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Projected Participation	-	2	4	1	2	9
ENERGY STAR Bathroom Ventilation Fan in Commercial Applications	3.6.2	Energy Savings (MWh)	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	1	1	-	-	2
ENERGY STAR Ice Machines	3.7.1	Energy Savings (MWh)	0	1	0	-	-	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	-	-	0.0
		Projected Participation	1	2	1	-	-	4
Controls: Beverage and Snack Machine Controls	3.7.2	Energy Savings (MWh)	-	1	1	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	2	2	-	-	4
	3.7.3	Energy Savings (MWh)	-	9	9	-	-	17

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
ENERGY STAR Electric Steam Cooker		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	2	2	-	-	4
ENERGY STAR Combination Oven	3.7.4	Energy Savings (MWh)	-	1	1	-	-	1
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	3	2	-	-	5
ENERGY STAR Commercial Convection Oven - Full Size	3.7.5	Energy Savings (MWh)	-	2	2	-	-	4
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	2	2	-	-	4
ENERGY STAR Commercial Fryer	3.7.6	Energy Savings (MWh)	-	7	5	-	-	12
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	3	2	-	-	5
ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	3.7.7	Energy Savings (MWh)	1	1	1	0	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	3	2	1	2	10
ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	3.7.7	Energy Savings (MWh)	-	5	-	5	-	11
		Summer Demand Reduction (MW)	-	0.0	-	0.0	-	0.0
		Winter Demand Reduction (MW)	-	0.0	-	0.0	-	0.0
		Projected Participation	-	3	-	3	-	6
ENERGY STAR Commercial Dishwasher	3.7.8	Energy Savings (MWh)	14	28	180	14	28	263
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	2	13	1	2	19
ENERGY STAR Commercial Griddle	3.7.9	Energy Savings (MWh)	-	3	9	-	-	11
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	1	3	-	-	4
Commercial Induction Cooktops	3.7.10	Energy Savings (MWh)	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation	-	1	1	-	-	2
Wall and Ceiling Insulation	3.8.1	Energy Savings (MWh)	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
Advanced Power Strips	3.9.1	Energy Savings (MWh)	-	-	-	0	-	0
		Summer Demand Reduction (MW)	-	-	-	0.0	-	0.0
		Winter Demand Reduction (MW)	-	-	-	0.0	-	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
ENERGY STAR Servers	3.9.2	Projected Participation	-	-	-	2	-	2
		Energy Savings (MWh)	-	-	-	53,822	-	53,822
		Summer Demand Reduction (MW)	-	-	-	6.9	-	6.9
		Winter Demand Reduction (MW)	-	-	-	7.1	-	7.1
Server Virtualization	3.9.3	Projected Participation	-	-	-	6	-	6
		Energy Savings (MWh)	9	-	-	26	-	35
		Summer Demand Reduction (MW)	0.0	-	-	0.0	-	0.0
		Winter Demand Reduction (MW)	0.0	-	-	0.0	-	0.0
Cycling Refrigerated Thermal Mass Dryer	3.10.1	Projected Participation	1	-	-	3	-	4
		Energy Savings (MWh)	-	0	0	0	0	2
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
Air-Entraining Air Nozzle	3.10.2	Projected Participation	-	2	2	2	2	8
		Energy Savings (MWh)	1	-	2	-	6	9
		Summer Demand Reduction (MW)	0.0	-	0.0	-	0.0	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	-	0.0	0.0
No-Loss Condensate Drains	3.10.3	Projected Participation	1	-	2	-	6	9
		Energy Savings (MWh)	2	5	13	5	6	31
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Air Tanks for Load/No Load Compressors	3.10.4	Projected Participation	2	4	11	4	5	26
		Energy Savings (MWh)	-	1	2	1	2	7
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
Variable-Speed Drive Air Compressor	3.10.5	Projected Participation	-	1	2	1	2	6
		Energy Savings (MWh)	290	340	328	290	277	1,525
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
Compressed Air Controller	3.10.6	Projected Participation	23	27	26	23	22	121
		Energy Savings (MWh)	1	2	2	1	1	6
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Compressed Air Low Pressure Drop Filters	3.10.7	Projected Participation	1	3	3	2	2	11
		Energy Savings (MWh)	-	2	2	2	2	8
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
Compressed Air Mist Eliminators	3.10.8	Projected Participation	-	18	17	19	17	71
		Energy Savings (MWh)	0	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
	3.11.2	Projected Participation	1	10	10	10	13	44
		Energy Savings (MWh)	-	-	1	-	-	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Engine Block Heater Timer		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	2	-	-	2
High Frequency Battery Chargers	3.11.3	Energy Savings (MWh)	9	10	11	10	6	46
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	7	8	9	8	5	37
Uninterruptible Power Supply (UPS)	3.11.4	Energy Savings (MWh)	-	-	1	-	0	1
		Summer Demand Reduction (MW)	-	-	0.0	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	0.0	0.0
		Projected Participation	-	-	5	-	1	6
Automatic Milker Takeoffs	4.1.1	Energy Savings (MWh)	3	-	3	-	-	6
		Summer Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Projected Participation	1	-	1	-	-	2
Dairy Scroll Compressors	4.1.2	Energy Savings (MWh)	12	12	23	-	-	46
		Summer Demand Reduction (MW)	0.0	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	-	-	0.0
		Projected Participation	1	1	2	-	-	4
High-Efficiency Ventilation Fans with and without Thermostats	4.1.3	Energy Savings (MWh)	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	4	-	-	4
Heat Reclaimers	4.1.4	Energy Savings (MWh)	2	-	7	-	-	9
		Summer Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	-	-	0.0
		Projected Participation	1	-	3	-	-	4
High Volume Low Speed Fans	4.1.5	Energy Savings (MWh)	108	149	166	149	116	689
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.0	0.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	13	18	20	18	14	83
Livestock Waterer	4.1.6	Energy Savings (MWh)	-	-	1	-	0	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	0.0	-	0.0	0.0
		Projected Participation	-	-	3	-	1	4
Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	4.1.7	Energy Savings (MWh)	-	5	5	-	5	15
		Summer Demand Reduction (MW)	-	0.0	0.0	-	0.0	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	0.0	0.0
		Projected Participation	-	1	1	-	1	3
Low Pressure Irrigation System	4.1.8	Energy Savings (MWh)	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
New Construction Lighting	3.1.2	Projected Participation	-	1	1	-	-	2
		Energy Savings (MWh)	3,691	5,186	9,141	8,947	6,188	33,153
		Summer Demand Reduction (MW)	0.7	0.9	1.6	1.6	1.1	5.9
		Winter Demand Reduction (MW)	0.7	0.9	1.6	1.6	1.1	5.9
		Projected Participation	21	30	52	51	35	189
Indoor Horticultural Lighting	3.1.7	Energy Savings (MWh)	3	5	7	8	10	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	3	4	5	6	20
		Energy Savings (MWh)	2	4	3	3	2	15
High Efficiency Transformer	3.11.1	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	4	3	3	2	14
		Energy Savings (MWh)	1,537	1,509	1,576	1,509	1,384	7,514
		Summer Demand Reduction (MW)	-	-	-	-	-	-
Midstream lighting incentives - Street lighting	3.1.6	Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.0
		Projected Participation	3,270	3,209	3,352	3,209	2,943	15,982
		Energy Savings (MWh)	1,180	1,178	1,571	1,178	1,062	6,168
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.3	0.3	0.4	0.3	0.3	1.6
Midstream lighting incentives: Outdoor floods	3.1.6	Projected Participation	3,213	3,209	4,279	3,209	2,892	16,800
		Energy Savings (MWh)	3,029	2,944	3,085	2,944	2,726	14,729
		Summer Demand Reduction (MW)	0.8	0.8	0.8	0.8	0.7	4.0
		Winter Demand Reduction (MW)	0.8	0.8	0.8	0.8	0.7	3.8
		Projected Participation	4,237	4,118	4,316	4,118	3,813	20,603
Midstream lighting incentives: High Bays	3.1.6	Energy Savings (MWh)	855	872	912	829	769	4,236
		Summer Demand Reduction (MW)	0.2	0.2	0.3	0.2	0.2	1.2
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.1
		Projected Participation	17,951	18,307	19,157	17,407	16,156	88,977
		Energy Savings (MWh)	-	30	30	30	30	120
HVAC Systems for Midstream Delivery: Air Conditioner	3.2.2	Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Projected Participation	-	40	40	40	40	160
		Energy Savings (MWh)	-	30	30	30	30	122
		Summer Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.1
HVAC Systems for Midstream Delivery: Heat Pump	3.2.2	Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.0
		Projected Participation	-	40	40	40	40	160
		Energy Savings (MWh)	-	75	77	77	77	305
		Summer Demand Reduction (MW)	-	0.1	0.1	0.1	0.1	0.2
		Winter Demand Reduction (MW)	-	0.0	0.0	0.0	0.0	0.2
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons for Midstream Delivery	3.2.6	Projected Participation	-	49	50	50	50	199

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Midstream Indoor Horticultural Lighting	3.1.7	Energy Savings (MWh)	2	2	3	3	2	12
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	2	2	1	7
Midstream Premium Efficiency Motors	3.3.1	Energy Savings (MWh)	20	20	20	20	20	101
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	2	2	2	2	10
Midstream Variable Frequency Drive (VFD) Improvements	3.3.2	Energy Savings (MWh)	47	47	47	47	47	237
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation	4	4	4	4	4	20
Midstream ENERGY STAR Refrigeration Cases	3.5.1	Energy Savings (MWh)	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	4	4
Midstream ENERGY STAR Freezer Cases	3.5.1	Energy Savings (MWh)	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	4	4
Midstream Controls: Evaporator Fan Controllers	3.5.3	Energy Savings (MWh)	-	-	-	-	4	4
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
Midstream Controls: Anti-Sweat Heater Controls	3.5.5	Energy Savings (MWh)	3	3	3	3	3	14
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	2	2	2	2	10
Midstream Controls: Evaporator Coil Defrost Control	3.5.6	Energy Savings (MWh)	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
Midstream ENERGY STAR Ice Machines	3.7.1	Energy Savings (MWh)	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Midstream ENERGY STAR Electric Steam Cooker	3.7.3	Energy Savings (MWh)	4	4	4	4	4	21
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	1	1	1	1	1	5
Midstream ENERGY STAR	3.7.4	Energy Savings (MWh)	2	0	1	0	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Combination Oven		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	6	1	5	1	4	17
Midstream ENERGY STAR Commercial Convection Oven - Full Size	3.7.5	Energy Savings (MWh)	6	-	1	-	1	8
		Summer Demand Reduction (MW)	0.0	-	0.0	-	0.0	0.0
		Winter Demand Reduction (MW)	0.0	-	0.0	-	0.0	0.0
		Projected Participation	6	-	1	-	1	8
Midstream ENERGY STAR Commercial Fryer	3.7.6	Energy Savings (MWh)	14	7	7	7	7	43
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	6	3	3	3	3	18
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	3.7.7	Energy Savings (MWh)	1	-	-	-	-	1
		Summer Demand Reduction (MW)	0.0	-	-	-	-	0.0
		Winter Demand Reduction (MW)	0.0	-	-	-	-	0.0
		Projected Participation	2	-	-	-	-	2
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	3.7.7	Energy Savings (MWh)	4	-	-	-	-	4
		Summer Demand Reduction (MW)	0.0	-	-	-	-	0.0
		Winter Demand Reduction (MW)	0.0	-	-	-	-	0.0
		Projected Participation	2	-	-	-	-	2
Midstream ENERGY STAR Commercial Dishwasher	3.7.8	Energy Savings (MWh)	28	28	124	41	28	249
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	2	9	3	2	18
Midstream ENERGY STAR Commercial Griddle	3.7.9	Energy Savings (MWh)	-	-	6	-	-	6
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	2	-	-	2
Midstream Air Tanks for Load/No Load Compressors	3.10.4	Energy Savings (MWh)	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation	-	-	-	-	2	2
Midstream Variable-Speed Drive Air Compressor	3.10.5	Energy Savings (MWh)	25	25	25	25	25	126
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation	2	2	2	2	2	10
Midstream High-Efficiency Ventilation Fans with and without Thermostats	4.1.3	Energy Savings (MWh)	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	-	-	2	-	-	2
Midstream Heat Reclaimers	4.1.4	Energy Savings (MWh)	-	-	4	-	-	4
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	2	-	-	2
Midstream High Volume Low Speed Fans	4.1.5	Energy Savings (MWh)	307	307	307	307	307	1,536
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	37	37	37	37	37	185
Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	4.1.7	Energy Savings (MWh)	-	-	10	-	-	10
		Summer Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation	-	-	2	-	-	2
Building Operator Certification Training	3.11.5	Energy Savings (MWh)	1,296	1,729	1,729	2,161	2,161	9,075
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.2	0.7
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation	6	8	8	10	10	42
Custom: Other - SEM	Custom	Energy Savings (MWh)	2,108	6,408	9,613	11,130	12,817	42,076
		Summer Demand Reduction (MW)	0.5	1.4	2.1	2.5	2.8	9.3
		Winter Demand Reduction (MW)	0.5	1.4	2.1	2.5	2.4	8.9
		Projected Participation	10	30	46	53	61	200
Custom: Other - VCx	Custom	Energy Savings (MWh)	7,500	7,875	7,875	7,875	7,875	39,000
		Summer Demand Reduction (MW)	1.2	1.3	1.3	1.3	1.3	6.5
		Winter Demand Reduction (MW)	1.2	1.3	1.3	1.3	1.3	6.5
		Projected Participation	75	79	79	79	79	390
Custom: Other - vSEM	Custom	Energy Savings (MWh)	-	2,000	2,000	2,000	5,000	11,000
		Summer Demand Reduction (MW)	-	0.3	0.3	0.3	0.8	1.8
		Winter Demand Reduction (MW)	-	0.3	0.3	0.3	0.8	1.8
		Projected Participation	-	20	20	20	50	110
Solar	3.11.6	Energy Savings (MWh)	14,455	21,300	19,642	12,244	2,551	70,192
		Summer Demand Reduction (MW)	5.0	7.4	6.8	4.3	0.9	24.4
		Winter Demand Reduction (MW)	0.8	1.2	1.1	0.7	0.1	3.8
		Projected Participation	68	100	92	58	12	330
Custom: Other - Compressed Air	Custom	Energy Savings (MWh)	1,367	1,641	1,914	3,829	3,829	12,580
		Summer Demand Reduction (MW)	0.1	0.2	0.2	0.4	0.4	1.3
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.4	0.4	1.3
		Projected Participation	5	6	7	14	14	46
Custom: Data Center	Custom	Energy Savings (MWh)	420	420	630	630	630	2,730
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	2	2	3	3	3	13
Custom: HVAC	Custom	Energy Savings (MWh)	6,628	10,116	13,081	13,081	13,081	55,985
		Summer Demand Reduction (MW)	2.0	3.1	4.0	4.0	4.0	17.2
		Winter Demand Reduction (MW)	2.0	3.1	4.0	4.0	4.0	17.2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	38	58	75	75	75	321
Custom: Motors & Drives	Custom	Energy Savings (MWh)	3,155	5,048	5,889	5,889	5,889	25,871
		Summer Demand Reduction (MW)	0.6	0.9	1.1	1.1	1.1	4.6
		Winter Demand Reduction (MW)	0.6	0.9	1.1	1.1	1.1	4.6
		Projected Participation	9	14	17	17	17	74
Custom: Other	Custom	Energy Savings (MWh)	20,530	25,903	29,356	29,356	16,501	121,647
		Summer Demand Reduction (MW)	2.2	2.8	3.2	3.2	1.8	13.3
		Winter Demand Reduction (MW)	2.2	2.8	3.2	3.2	1.8	13.3
		Projected Participation	107	135	153	153	86	634
Custom: Process	Custom	Energy Savings (MWh)	1,555	2,000	2,222	2,222	2,888	10,887
		Summer Demand Reduction (MW)	0.4	0.5	0.5	0.5	0.7	2.6
		Winter Demand Reduction (MW)	0.4	0.5	0.5	0.5	0.7	2.6
		Projected Participation	7	9	10	10	13	49
Custom: Refrigeration	Custom	Energy Savings (MWh)	2,144	2,703	3,076	3,076	3,076	14,074
		Summer Demand Reduction (MW)	0.2	0.3	0.4	0.4	0.4	1.6
		Winter Demand Reduction (MW)	0.2	0.3	0.4	0.4	0.4	1.6
		Projected Participation	23	29	33	33	33	151
Custom: EMS	Custom	Energy Savings (MWh)	891	1,188	1,336	1,336	1,336	6,088
		Summer Demand Reduction (MW)	0.0	0.0	0.1	0.1	0.1	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.1	0.1	0.1	0.2
		Projected Participation	6	8	9	9	9	41
Custom: Retrocommissioning	Custom	Energy Savings (MWh)	7,198	9,064	10,130	10,130	10,130	46,652
		Summer Demand Reduction (MW)	3.3	4.2	4.7	4.7	4.7	21.5
		Winter Demand Reduction (MW)	3.3	4.2	4.7	4.7	4.7	21.5
		Projected Participation	27	34	38	38	38	175
Custom: CHP	Custom	Energy Savings (MWh)	2,470	14,323	16,154	10,769	10,769	54,484
		Summer Demand Reduction (MW)	0.2	0.7	0.7	0.5	0.5	2.7
		Winter Demand Reduction (MW)	0.2	0.7	0.7	0.5	0.5	2.7
		Projected Participation	1	3	3	2	2	11
ASHARE Audits/Feasibility Studies	Audit	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	10	10	10	10	10	50
Incentive Buy Down	N/A	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	30	35	40	45	50	200
C&I Load Shifting	Load Shifting Measure	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.5
		Projected Participation	2	4	5	6	6	23

Estimated Program Budget (Total) by Year

Table 34. Non-Residential Program Budget

Program Name:		Non-Residential					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$34,179	\$42,508	\$47,045	\$50,850	\$39,342	\$213,923
Incentives (\$000)³³	Rebates	\$16,168	\$22,512	\$24,396	\$27,998	\$19,270	\$110,345
	Upstream/Midstream Buydown	\$913	\$967	\$1,056	\$948	\$888	\$4,772
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$4,022	\$4,093	\$4,356	\$4,105	\$3,683	\$20,258
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$21,103	\$27,572	\$29,808	\$33,050	\$23,840	\$135,374
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549
Percent Incentives		62%	65%	63%	65%	61%	63%

³³ Incentive totals include interest-free financing options for qualified small commercial customers in addition to traditional incentive offerings. These financing options fall within the incentive definition outlined in the TRC Order of “transfer payments intended to offset the IMC of efficient equipment.”

Estimated Percentage of Sector Budget Attributed to the Program

The Non-Residential program offers incentives to customers in the SCI and LCI sectors. The Non-Residential program accounts for 95.6% of SCI and 95.9% of LCI sector spending exclusive of common cost allocation.

Table 35. Non-Residential Summary of EE&C Costs

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MWh)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM & V	AEPS Registration Support	Other				
Non-Residential Portfolio	Small C&I	\$64,986,024	\$0	\$0	\$0	\$34,814,664	\$1,155,777	\$0	\$33,423	\$0	\$100,989,888	\$236	\$72	\$1,473,492
	Large C&I	\$70,388,160	\$0	\$0	\$0	\$41,142,530	\$1,363,220	\$0	\$39,327	\$0	\$112,933,237	\$206	\$69	\$1,139,321
	Sector Total	\$135,374,185	\$0	\$0	\$0	\$75,957,194	\$2,518,997	\$0	\$72,750	\$0	\$213,923,126	\$220	\$70	\$1,297,078

Cost Effectiveness

Table 36. Non-Residential TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Non-Residential	PY18	1.00	1.50	\$21,103	\$78,459	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$2	\$168,844
Non-Residential	PY19	1.00	1.47	\$27,572	\$108,485	\$14,936	\$150,993	\$65,867	\$155,479	\$109	\$3	\$221,458
Non-Residential	PY20	1.00	1.33	\$29,808	\$131,215	\$17,236	\$178,259	\$71,977	\$165,799	\$178	\$3	\$237,957
Non-Residential	PY21	1.00	1.41	\$33,050	\$109,621	\$17,799	\$160,470	\$69,134	\$157,817	\$61	\$3	\$227,015

<i>Non-Residential</i>	<i>PY22</i>	<i>1.00</i>	<i>1.54</i>	\$23,840	\$76,785	\$15,502	\$116,127	\$54,944	\$124,246	\$80	\$2	\$179,272
<i>Non-Residential Total</i>		<i>1.00</i>		\$135,374	\$504,565	\$78,549	\$718,488	\$314,055	\$720,013	\$465	\$14	\$1,034,546

Table 37. Non-Residential TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Non-Residential</i>	<i>PY18</i>	<i>0.684</i>	<i>1.42</i>	\$21,103	\$47,008	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$2	\$115,506
<i>Non-Residential</i>	<i>PY19</i>	<i>0.684</i>	<i>1.40</i>	\$27,572	\$65,505	\$14,936	\$108,013	\$45,059	\$106,363	\$75	\$2	\$151,499
<i>Non-Residential</i>	<i>PY20</i>	<i>0.684</i>	<i>1.28</i>	\$29,808	\$80,347	\$17,236	\$127,392	\$49,240	\$113,423	\$122	\$2	\$162,787
<i>Non-Residential</i>	<i>PY21</i>	<i>0.684</i>	<i>1.35</i>	\$33,050	\$64,551	\$17,799	\$115,400	\$47,295	\$107,963	\$42	\$2	\$155,301
<i>Non-Residential</i>	<i>PY22</i>	<i>0.684</i>	<i>1.45</i>	\$23,840	\$44,998	\$15,502	\$84,340	\$37,587	\$84,996	\$55	\$2	\$122,640
<i>Non-Residential Total</i>		<i>0.684</i>		\$135,374	\$302,408	\$78,549	\$516,332	\$214,845	\$492,561	\$318	\$9	\$707,733

Summary of Benchmarking Results

As mentioned in Section 3.2 PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

PECO's engagement strategy reflects the distinct needs of large and small C&I customers. Large businesses often have complex operations and longer decision-making cycles, requiring data-driven targeting, customized solutions, and detailed cost-benefit analyses. Small businesses, by contrast, prioritize simplicity and quick payback, so PECO focuses on streamlined program designs, clear communication, and minimal administrative burden. Additionally, PECO plans to offer small businesses 0% financing to help overcome capital constraints and implement impactful projects. By tailoring approaches to these differences, PECO ensures broad participation in its program design.

Other Information Deemed Appropriate

Not applicable.

3.5 Government/Nonprofit/Institutional Sector

Municipal government, nonprofits, and institutions will have a specific assigned outreach representative for engagement in the prescriptive and custom components of the Non-Residential program. Outreach will coordinate with PECO's economic development, large customer services team and government affairs to work collaboratively to engage and educate these customers on the value of energy efficiency and participation in PECO programs. The CSP will tailor marketing and outreach to reflect the priorities of GNI customers, such as sustainability goals and budget constraints and will implement sector-specific messaging where appropriate. For example, many municipal governments use energy master planning to better understand how they use and manage energy. PECO's outreach team will directly support implementation of those plans using its Non-Residential program incentives.

4. Program Management and Implementation Strategies

This section provides a detailed description of how PECO plans to manage and implement programs, including the approach to, and use of, CSPs. Section 4.1 discusses an overview of PECO's management and implementation strategies, including the organization with CSPs, constraints, milestones, and risks. Section 4.2 includes the executive management structure and the basis for costs. Section 4.3 describes the selected CSPs and the activities they will carry out for Act 129 implementation. Section 4.4 speaks to coordination with other state conservation programs, discussing health and safety, AEPS registration, and collaboration with programs such as the IRA 50121 and 50122 programs.

4.1 Overview of PECO Management and Implementation Strategies

Led by PECO's program management team, each CSP will work closely with the PECO Marketing and Promotions Team, the E&O CSP, and the Exelon Energy Efficiency Marketing Agency to make PECO's energy efficiency programs successful. The responsibilities of each role are described below.

4.1.1 Services to be Provided by PECO, Consultants, Trade Allies, and CSPs

This section describes the services to be provided by key program stakeholders, including PECO Program Managers, PECO's Marketing Team, CSPs, Data Vendors, Evaluators, Trade Allies, and Market Actors.

PECO Program Managers

- Oversee the CSP's performance and service obligations and make sure the CSP's delivery aligns with the approved EE&C Plan.
- Oversee and actively manage the CSP's performance.
- Approve CSP payments (non-incentive payments) on a monthly and annual basis and incentive payments on a weekly or otherwise basis.
- Manage the overall CSP contract.
- Oversee program-level marketing with the CSP in coordination with the PECO marketing and promotions team.
- Work with CSPs to manage and direct the sales process and approach.
- Engage with customers as needed when issues are escalated by the customer, trade ally, and/or CSP.
- PECO Marketing and Promotions Team
- Manage the portfolio's broad awareness campaign with the Exelon Energy Efficiency Marketing Agency and coordinate the implementation CSPs and E&O CSP on advertising and marketing participant engagement strategies.
- Coordinate the education outreach strategy, content, and community event participation.

- Manage and track customer awareness and satisfaction studies.
- Facilitate delivery of premium customer/participant experiences by providing oversight of customer support infrastructure.

Exelon Energy Efficiency Marketing Agency

The Exelon Energy Efficiency Marketing Agency will design and lead the overall advertising plan for all programs. This will include the programs' look and feel, messaging, and advertising channels. The Exelon Energy Efficiency Marketing Agency will coordinate through the PECO senior marketing specialists and CSPs on program-specific materials. (Note: The advertising vendor will not be responsible for identifying and tracking leads. CSPs will identify, follow up with, and track leads).

CSPs

- Deliver energy efficiency savings and associated peak demand reductions on time and on budget while making it easy for customers to participate.
- Maintain high customer satisfaction.
- Develop and adjust program implementation strategies in collaboration with PECO program managers.
- Develop, maintain and support market actor networks (retailers, distributors, contractors, manufacturers, builders, raters, project developers).
- Develop program marketing and coordinate with the PECO Marketing and Promotions team and Exelon Energy Efficiency Marketing Agency for design and consistency in messaging.
- Program outreach and lead generation (including development and distribution of program materials, neighborhood canvassing, trade ally and association networking, customer support infrastructure/lead conversion).
- Manage audits (including customer screening, hiring, training and monitoring of auditors and contractors, measure direct installation, and customer audit reports).
- Distribute efficient measure giveaways or energy kits, if applicable.
- Pick up and recycle appliances (and other equipment), if applicable.
- Process incentives (receive, review, and verify applications and pay rebates).
- Track program performance and implement continuous improvement.
- Report program activities while adhering to PECO and regulatory data reporting requirements and responding to internal or external requests.
- Continuously improve forecasting accuracy.
- Achieve low-income carve-out targets.
- Coordinate with other related activities and partnerships.

- Support any program amendment process should program goals or budget need adjustment to suit the portfolio.
- Provide weekly transactional data to PECO for execution of customer satisfaction survey tools.
- Adapt program implementation strategies to continue program operations and achieve program goals through market disruptions such as changing codes and standards, removal of federal programs such as ENERGY STAR, etc.
- Facilitate AEPS registration process.

Data Vendor

The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques. The data vendor will also collaborate with PECO, CSPs, and evaluators to develop and provide summary and detailed reports.

Evaluator

The independent evaluation contractor is responsible for the portfolio's EM&V and will verify that programs meet goals and are operated consistently with the approved Plan. They will interface with the SWE to confirm measurement and verification protocols are aligned with the state's requirements and periodically provide PECO feedback on the identified areas where delivery performance could be improved. The independent evaluation contractors will also support PECO with semiannual and annual compliance reports.

Trade Allies

Through the right combination of trade ally management, marketing, education, data analytics, and outreach, trade ally networks will be motivated to increase performance and provide valuable feedback for program design and implementation. CSPs will engage existing trade allies and reach out to potential new trade ally participants prior to the start of Phase V to provide a portfolio-wide trade ally database focused on:

- Maintaining active trade ally participation requirement status
- Identifying underperformers to focus campaigns for increased production
- Engaging contractors to participate
- Providing all participating trade allies with program information and announcements

Trade ally outreach may also include monthly program newsletters with updates, quarterly trade ally report cards with metrics, and annual trade ally events to provide education on programs and technologies, sales training, and networking opportunities for those with complementary business models.

Market Actors

The CSPs will engage market actors as partners in program outreach and marketing. Specific market actors and their roles include:

- **Influencers:** Community organizations, associations and influencers that customers follow, join, or rely on for advice. They are trusted partners with unique connections to their constituents – targeted PECO customers. Examples include condominium boards for multifamily tenants and property managers, home care services, community Weatherization Assistance program agencies and food banks serving low-income customers, and HERS Raters and Home Builders Associations for new construction.
- **Contractors and design firms:** Professionals who specify energy and demand savings equipment, sell and install planned or emergency replacement high-efficiency equipment.
- **Distributors and manufacturers:** Stakeholders who stock and price-to-move high-efficiency equipment as well as participants in a residential and non-residential midstream or upstream program component. CSPs will build relationships through national distribution and manufacturer networks, associations, and organizations.
- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Government agencies:** Local township sponsored community events enabling direct customer engagement for cross promotion of multiple programs; recycling centers and township websites encouraging PECO refrigerator and freezer recycling programs; and financial assistance programs that can aid customers along the energy efficiency continuum.

4.1.2 Risk Categories and Risk Mitigation Strategies

Section 3 includes risks for individual programs. There are also risks inherent in the delivery of any energy efficiency portfolio. PECO is taking several key steps to manage those risks:

- Selecting programs that are diversified in design and implementation strategy including some program components that are relatively simple, flexible, and have a history of delivering results in Pennsylvania and other states (e.g., upstream and midstream retail programs) combined with comprehensive program offerings that strive for deeper energy savings.
- Developing a Plan with multiple program components and a broad mix of measures to avoid over-reliance on any single measure.
- Forecasting to exceed the overall energy and demand savings targets to hedge unknown performance across the entire portfolio.

4.1.2.1 Performance Risk

PECO managed performance risk by using a robust CSP RFP process for selecting CSPs with proven experience to implement the approved Plan. PECO used a disciplined RFP evaluation and selection process to support the engagement of experienced CSPs in the delivery of the programs (requiring CSP proposals to demonstrate a proven track record of performance). CSP contracts, where possible, will include performance clauses to establish that CSPs have a strong financial incentive to succeed.

PECO program managers will be responsible for continual oversight of CSP performance against the Plan and will promptly implement corrective actions if goals are not being met. Lastly, PECO will continue to meet with stakeholders and other Pennsylvania EDCs to share learnings and draw on program experience across the state to continuously improve the programs in its portfolio.

4.1.2.2 Technology Risk

The EE&C Plan incentivizes customers for purchasing and installing known technologies and products with established TRM energy and demand savings. The TRM provides the standards for determining the prescriptive or deemed energy savings. Using this approach removes much of the technology risk from the Plan's prescriptive energy efficiency measures and results in a more cost-effective measurement and verification process.

PECO's CSPs will calculate custom project savings on an individual project basis, using the existing (or code-required) equipment as the baseline of energy use. CSPs will conduct pre- and post-inspections, where appropriate, to verify equipment and operating conditions. Incentive payment estimates will be based on standard engineering and energy calculation principles and final payments will be based on the confirmed savings.

An additional technology risk is related to data sharing and cybersecurity. Coordination with external entities and complementary programs introduces the potential for sensitive customer information to be exposed without consistent or clearly defined guidance. As data exchanges become more frequent and complex, particularly when integrating with statewide initiatives with third-party platforms, such as the IRA programs, the risk of unauthorized access or misuse grows.

Mitigation strategies focus on proactive governance and secure practices. PECO will adopt robust, industry-standard data-sharing protocols that prioritize encryption, authentication, and customer consent at every stage of the process. Clear procedures will be implemented to ensure compliance with applicable privacy regulations and internal security policies. Additionally, PECO will actively participate in the PUC working group on data sharing and cybersecurity to align with statewide best practices, anticipate emerging threats, and continuously refine its approach to safeguarding customer information.

4.1.2.3 Market Risk

PECO worked diligently to develop a strong portfolio of programs, benchmarked for success in comparable jurisdictions, and developed with input from key stakeholders. Uncovering barriers to participation and developing approaches that address these barriers facilitates program

success. PECO has gained significant experience and market connections in the process of delivering its Phase I-IV programs. Informed by this experience, some of PECO's strategies to reduce market risk include the following:

- **CSP Collaboration:** PECO developed the Plan collaboratively with CSPs to reduce the risk that the Plan is not achievable in the market environment.
- **Customer Education:** Education and awareness are an integral component of every program. This will include program awareness and the benefits of becoming more energy efficient.
- **Trade Ally Coordination:** All trade allies will be offered training opportunities and provided appropriate materials and technical support. The intent is to facilitate program awareness and knowledge, provide strategies for selling energy efficiency and peak demand reduction to their customers, and educate the trade allies.
- **Program Promotion:** PECO and its contractors will implement a strong promotional advertising campaign to drive awareness and call on customers to act.
- **Product Promotion:** Point-of-purchase materials will be placed in participating retail stores; customers will be able to easily participate using instant rebates.
- **Streamlined Participation:** Program eligibility and streamlined application processes will make participation as easy as possible for customers.

4.1.2.4 Evaluation Risk

PECO will use several strategies to minimize evaluation risk. Eliminating evaluation risk begins with program design to establish that all assumptions and EM&V protocols are agreed upon in advance. PECO will work closely with the SWE to maintain consistent assumptions and processes throughout implementation.

However, there are emerging risks that could impact evaluation outcomes. Changes to regulatory guidance or updates to the TRM may affect claimable savings, introducing uncertainty in compliance verification. Additionally, the potential elimination of the ENERGY STAR program could make verifying the efficiency of certain equipment more challenging, as ENERGY STAR has historically provided a widely accepted benchmark for qualifying products.

To mitigate these risks, PECO's independent EM&V contractor will continue to conduct disciplined verification activities for each program, ensuring that measures receiving incentives are properly installed. PECO and its EM&V contractor will rely on industry standards and state-approved methods for measurement and verification, while adapting processes as needed to address any changes in guidance or program requirements.

4.1.3 Human Resource and Contractor Resource Constraints

Flexibility in resource staffing is needed to effectively implement the EE&C Plan. PECO will manage human resource and contractor resource constraints through deliberate staffing and training. Each CSP has laid out a succession plan in the event of staff changes, including backups for staff roles.

Internally, the organization will be overseen by PECO's Energy and Marketing Services team and will be further broken out in the marketing department by the following groups: Residential Energy Efficiency programs, C&I programs, Measurement and Verification, Business Planning and Promotions.

4.1.4 Early Warning Systems To Indicate Progress Towards Goals and Process for Adjustment

PECO has several methods for monitoring progress toward goals and ensuring that corrective actions are taken:

- Program managers will closely monitor the programs through direct interface with the CSPs and through the demand side management program tracking database. PECO will develop and monitor performance indicators for each program monthly. Regular review of performance metrics and feedback from CSPs will allow program managers to identify potential issues and take prompt corrective actions.
- Regular program evaluation will identify issues that may impede a program's ability to effectively reach its goals. The EM&V contractor will conduct evaluations to make sure that issues are identified early in the program cycle. It will be the PECO EM&V team's responsibility to confirm that program managers consider recommended improvements and incorporate them into the program design as warranted.
- As part of PECO's ongoing review of program performance, PECO will regularly assess budget distribution to establish that funds are allocated effectively. If monitoring shows adjustments are needed, PECO will take proactive steps, including amending its EE&C Plan as done in Phase IV, to keep program dollars aligned with compliance objectives and customer needs.
- PECO will monitor efforts to update building and appliance codes that may affect the building or equipment baselines and develop strategies to adapt these changes into any affected program's design. Whether there are changes due to codes and standards or evaluation results, PECO will quickly react to actual or potential changes in the TRM to confirm that programs are claiming appropriate energy savings. In addition, changes to TRM measures through IMPs will be actively monitored by PECO and the PECO EM&V team to determine that savings remain accurate and are verified using the most up-to-date guidance.

4.1.5 Implementation Schedule with Milestones

The planned implementation schedule follows:

- **January through March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.

- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

4.1.6 Stakeholder Engagement Overview

PECO plans to regularly engage with stakeholders, including community organizations, groups, and individuals serving low-income populations to help establish that the Plan design is implemented consistently with the vision presented in this Plan. PECO will continue to be an active and engaged participant in PUC-sponsored meetings and activities and will initiate stakeholder input sessions with PECO's customer groups and partners. *PECO will designate a dedicated staff-level coordination lead and establish a formal, stakeholder-informed coordination framework to govern interactions between Residential and Low-Income Act 129 programs and external groups such as home repair, weatherization, and energy efficiency programs as well as governmental or non-profit housing, legal, and direct service providers operating in PECO's service territory.*

The CSPs will also engage a variety of organizations such as:

- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Local community-based organizations:** Bucks County Opportunity Council, Delaware and Philadelphia County Housing Authorities, government organizations like Philadelphia Energy Authority, and advocates such as the Housing Alliance.
- **Business and Diversity Networks:** African American Chamber of Commerce of PA, NJ & DE; U.S. Black Chambers / National Black Chamber of Commerce; National Association of Women Business Owners (NAWBO); Small Business Diversity Network (SBDN); Brown Skin Brunchin'.
- **Local and Regional Business Support Organizations:** Penn State Smeal Minority-Owned Business Network; Pennsylvania Events & Small Business Network; Service Corps of Retired Executives (SCORE); Accion U.S. Network. Partners that offer mentoring, workshops, and procurement opportunities; provide access to small business communities and events; and support workforce development through coaching and training resources.

4.2 Executive Management Structure

This section describes PECO's structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and financial management, program implementation, procurement, program tracking and reporting, and QA/QC. Figure 3 includes the management team responsible for implementing PECO's EE&C Plan.

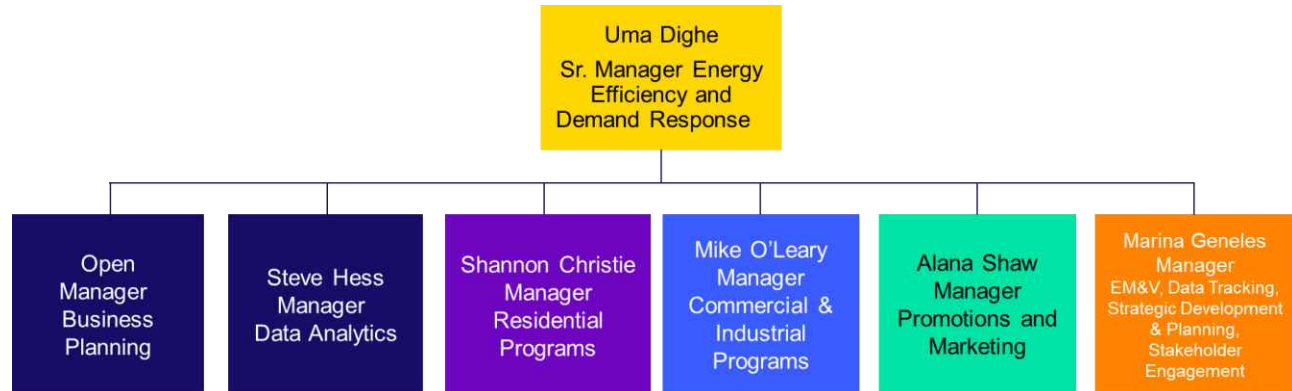
4.2.1 PECO Structure for Addressing Portfolio Strategy

Responsibility for the entire portfolio of programs resides within a single organization, with executive-level leadership provided by the Senior Manager of the Energy Efficiency Portfolio. Individual Managers are assigned responsibility for each market sector and key functional support areas. This executive team is responsible for overall portfolio strategy and planning.

Primary program management is organized by market sector: C&I and residential. Individual program managers are assigned to each program and have overall responsibility for the programs with support from the functional support groups: promotions and marketing, data analytics, business planning, and EM&V. They provide specialized support services to the program managers in the following areas:

- Promotions and marketing coordinates all internal and external communications.
- Business planning is responsible for all financial aspects of the portfolio. This responsibility includes budget and financial management as well as maintaining the portfolio tracking database to provide performance tracking and reporting.
- EM&V oversees the evaluation contractor and interfaces with the SWE as well as leads plan development, filings, and oversees strategic and policy decisions as it pertains to Act 129 compliance and regulatory objectives.

Figure 3. PECO Proposed EE&C Organization



4.2.2 Approach for Overseeing the Performance of CSPs and Other Providers

PECO will oversee CSPs through a comprehensive management, compensation, and evaluation framework designed to facilitate achievement of Act 129 goals and continuous program improvement.

- **Performance-Based Compensation:** A portion of CSP compensation will be tied to verified MWh and MW savings that contribute to achieving regulatory targets (\$/verified MWh and \$/verified MW).
- **Key Performance Metrics and Monitoring:** PECO will incorporate key performance metrics into CSPs contracts including participation, costs, savings, adherence to plan,

participant experience, and more. PECO program managers will maintain regular communication with CSPs to review progress, address challenges, and implement changes as needed to support program success.

- **Regular Reporting by CSPs to PECO:** CSPs will share program participation and project status updates with PECO on a regular basis.
- **Independent Evaluation and Customer Feedback:** PECO will assess customer and market actor satisfaction through each program's EM&V process. Independent evaluation contractors will provide PECO with feedback on CSP performance. PECO will use this feedback to inform program adjustment and help the CSPs deliver high-quality programs.
- **Continuous Improvement and Accountability:** PECO's program management approach emphasizes transparency, accountability, and ongoing improvement. CSPs are required to report lessons learned, propose enhancements, and response to evolving market and regulatory requirements. This structure will support CSPs in delivering programs that maximize benefits for PECO customers.

4.2.3 Basis for Administrative Budget (non-incentive costs)

Administrative costs (non-incentive costs) in PY18–PY22 will be factored into the overall portfolio benefit-cost analysis. These costs include all non-incentive costs and are aligned with the budget categories in Table 9 for each program. To determine the administrative budget, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include:

- **Program Design:** Includes all costs related to designing the Phase VI program, assuming there will be a Phase VI, including updating avoided costs and load shape research. Additionally, program design costs will include research and development (R&D) efforts including those for pilots.
- **Administrative:** Represents costs required to develop, oversee, and execute all programs in the portfolio. These costs include the data vendor contract, PECO legal, IT support, administrative costs related to the data sharing workgroup, and costs related to braided funding support.
- **EDC Delivery Costs:** Represents labor costs for PECO staff to run the programs.
- **CSP Delivery Fees:** Includes all fixed costs to implement the Plan for the Residential Energy Efficiency, HER, and Non-Residential Energy Efficiency programs, as well as costs associated with facilitating AEPS registration.
- **Marketing:** Represents broad marketing, education, and outreach efforts to promote the overall portfolio of energy efficiency and peak demand reduction programs as well as specific and targeted marketing strategies for specific programs and solutions. This will include expenditures on radio, newspaper, social media, and sponsorships promoting the program portfolio.

- **EM&V:** Represents costs associated with third-party independent EM&V for the full portfolio process and impact evaluation activities, including continuous improvement activities.
- **AEPS Registration Support:** Represents costs for the CSP to facilitate the AEPS registration process.
- **Other:** Includes PECO staff training, Conferences such as eSource related to energy efficiency programs, licenses required for successful program implementation and unforeseen circumstances which are possible but cannot be predicted at the time of developing this Plan.

4.3 CSPs

4.3.1 Selected CSPs

PECO issued RFPs and is in the process of selecting and contracting CSPs for implementing and evaluating the Phase V programs. The selected implementation CSPs and independent evaluator, their qualifications, and basis for selection will be shared with the PUC. Each CSP and evaluation contract is deemed confidential and proprietary; each will be filed with the PUC separately. No CSP contract will be effective until approved by the PUC.

4.3.2 Describe the Work and Measures Being Performed by CSPs

CSPs will implement the energy efficiency programs using their experience and capabilities from implementing previous PECO programs and other programs across the country. Each of the selected CSPs will be responsible for implementation services detailed in the individual program descriptions in Section 3.

4.3.3 Describe Any Pending RFPs to Be Issued for Additional CSPs

PECO does not plan to issue any additional RFPs at the time of developing this Plan.

Exelon will look to hire an Energy Efficiency Marketing Agency. This vendor will design and lead the overall advertising plan for Energy Efficiency programs across the Exelon Operating Companies. This will include look and feel, messaging, and advertising channels. The vendor will coordinate with PECO's Promotions Team and CSPs on program-specific materials. The vendor will not be responsible for identifying and tracking leads.

4.4 Coordination with Other State Conservation Programs

As part of its Phase V program plans, PECO will actively collaborate with other state conservation initiatives to maximize impact. These partnerships are essential for delivering the greatest possible value in energy savings and improving customer experience for ratepayers across PECO's service territory.

4.4.1 Collaboration with Other State or Federal Programs to Achieve Savings

Refer to Section 3.1.5 for details about collaboration with non-Act 129 programs.

4.4.2 PECO's Plan to Highlight the Availability of Multiple Funding Sources

PECO's Phase V Plan highlights the availability of multiple funding sources to help customers maximize participation and project impact. To facilitate awareness and accessibility, PECO will engage contractors through targeted outreach and provide education. These strategies are designed to reduce barriers, enhance affordability, and deliver greater value across PECO's service territory.

4.4.3 Process to Facilitate Alternative Energy Portfolio Standards Registration for C&I Participants of Act 129 Programs

PECO is committed to establishing a clear and collaborative process to help C&I participants meet Alternative Energy Portfolio Standards (AEPS) within Act 129 programs. This approach will focus on alignment with regulatory objectives, streamlined participation, and enhanced customer support, with additional details to be defined as program design evolves.

Current planning considerations, active June 1, 2026, include:

- Identifying eligible projects and informing customers of AEPS registration requirements and benefits
- Providing guidance to facilitate AEPS registration
- Coordinating with the PUC, as needed, to enable timely and accurate registration
- Tracking and reporting AEPS-related activities and costs to facilitate transparency and alignment with regulatory obligations

4.4.4 Plans to Address Health and Safety Issues that Arise in the Delivery of Act 129 Services

PECO recognizes the importance of addressing health and safety barriers to ensure equitable access to energy efficiency programs for residential customers. As part of the broader Phase V Residential Energy Efficiency portfolio, the program will allocate up to \$3,000,000 to fund health and safety measures for low-income households. PECO will not impose a standard per-household cap on health and safety spending for its Act 129 program in Phase V. Rather, PECO will assess health and safety needs on an individual basis while considering the available Phase V Health and Safety budget.

The program will take proactive steps during a customer's in-home appointment. Energy advisors will identify any obstacles that could prevent the installation of energy efficiency measures such as electrical safety concerns, combustion issues, mold, or asbestos and may install safety devices, such as a smoke/carbon monoxide detector, when appropriate. By addressing these issues, the program ensures that homes are not deferred from participation due to such barriers.

To make participation accessible for all, the program will provide bilingual energy advisors and translation services when needed, assisting customers whose primary language is not English. Additionally, to support individuals with different abilities, the program will confirm during

scheduling that customers with special needs have a trusted friend or relative present during service. This approach ensures every customer receives the full benefits of the program.

4.4.5 Strategies to Collect Information about Dual Participation to Facilitate Accurate Reporting on Braided Funding Opportunities and Calculation of the “Leverage Ratio” by Program.

In alignment with the Phase V Final Order, PECO will implement strategies to accurately capture and report instances of dual participation across programs. This effort is critical for identifying braided funding opportunities and ensuring compliance with reporting requirements. PECO’s approach will include enhanced data-sharing protocols, coordination with state agencies, and stakeholder engagement to support transparent calculation of the “Leverage Ratio” by program.

5. Reporting and Tracking Systems

This section describes the reporting and critical data management and tracking systems PECO will use to implement programs, and which the PUC and PECO's evaluation contractor will need to access. Section 5.1 will include reporting done by PECO to the SWE, including an example proposed schedule for PY18 and PY19. Section 5.2 details the proposed project management tracking systems, such as how data will be handled, how CSPs will integrate with the tracking system, how the Commission and SWE would access this data, and what protocols are in place for handling personal identifiable information (PII).

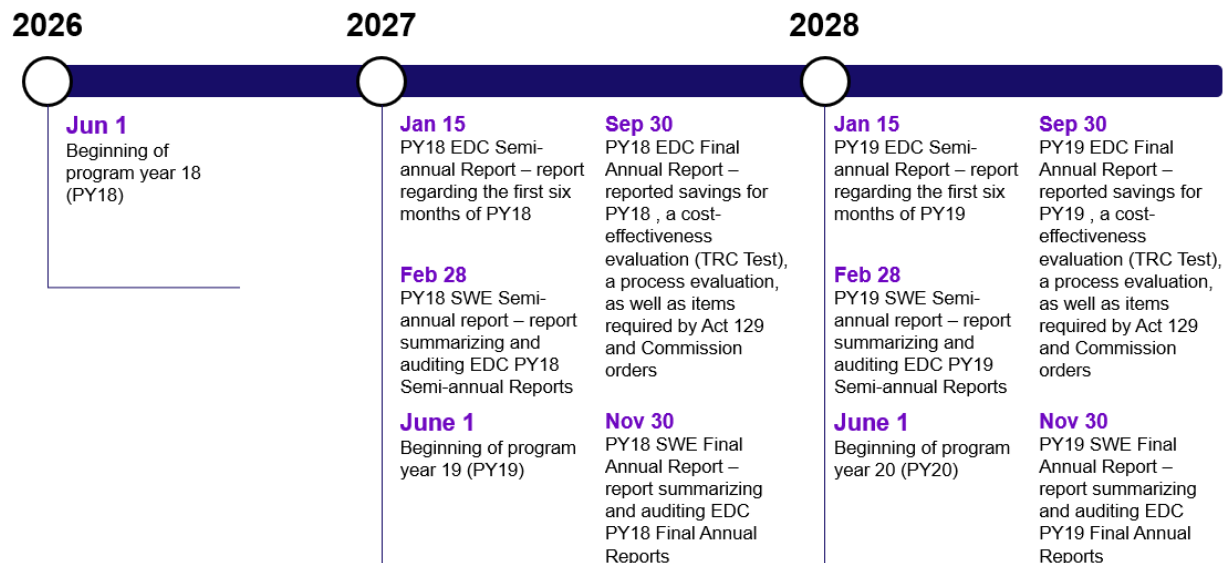
5.1 Reporting

The evaluation contractor will be responsible for interfacing with the SWE to determine the required data collection and reporting requirements and confirm that all data collection and reporting requirements are satisfied by the data vendor and CSPs.

The evaluation contractor will support development of PECO's semiannual and annual reports as prescribed in the Phase V Final Order for each program year of Phase V:

- **Semiannual Reports:** These reports capture program activity for the first half of each program year and are filed by January 15 of each year.
- **Annual Reports:** These final annual reports will be filed no later than September 30th, 120 days after the end of each full program year. Final annual reports for each program year will include reported and verified savings, a cost-effectiveness evaluation (total resource cost [TRC] test), process evaluation results, and items required by Act 129 and PUC orders. In addition, PECO will provide information on coordination metrics regarding referrals with non-Act 129 programs.
- **Reporting Schedule:** All PECO Act 129 EE&C Phase V reports will be filed with the PUC's Secretary's Bureau, with a copy provided to the SWE. Further, all reports will be posted to the PECO website. Reporting for each program year of Phase V will follow the example proposed schedule for PY18 and PY19 outlined in the Phase V Final Order:

Figure 4. Proposed Schedule for PY18 and PY19



5.2 Project Management Tracking Systems

This section presents the data management system requirements that PECO anticipates will meet internal and external (SWE) needs.

5.2.1 Data Tracking System Overview

PECO's data tracking system collects and stores comprehensive and consistent program and invoice data from CSPs. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will also support PECO's QA process and EM&V requirements. Protecting sensitive data, personally identifiable information, personal information, intellectual property, and data from theft and damage is integrated into PECO's data management process.

The data tracking system includes a user interface for entering, reviewing, and extracting program and invoice data. The data tracking system will support PECO's tracking of:

- Incentives paid
- Reported kilowatt-hours and kilowatts achieved
- Implementation costs
- Administrative costs

PECO's data management tracking system and approach to data management will facilitate consistent data inputs across the different CSPs throughout Phase V. There are four key contributors/users involved with data tracking, each with an important role in ensuring tracking data quality:

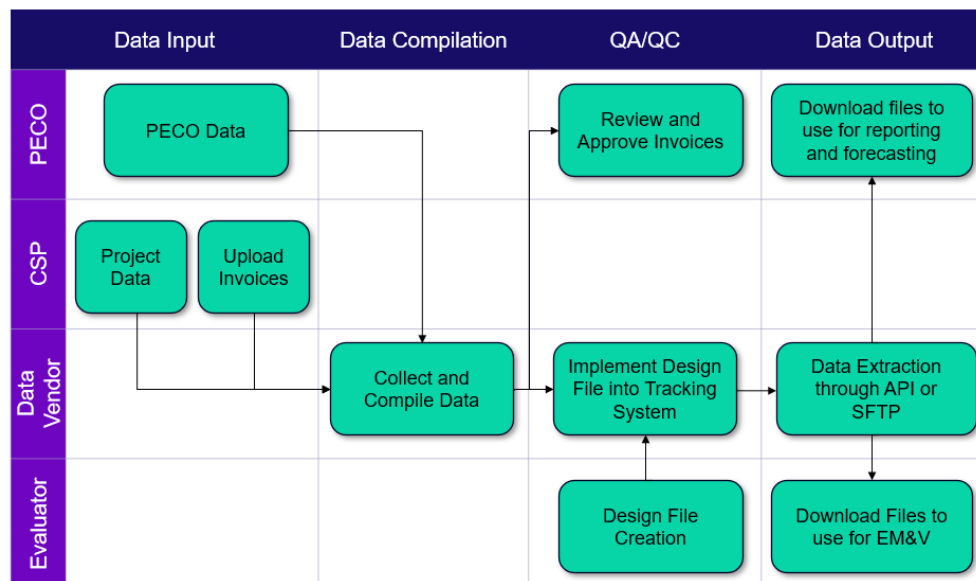
- **Database Vendor:** The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques.
- **CSPs:** CSPs will be responsible for inputting program data into the tracking database in accordance with the data protocols.
- **PECO Program Managers:** PECO program managers will track and review data for their individual programs.
- **Evaluator:** The evaluation contractor will conduct process and impact evaluations for each program. These evaluations will review the tracking data inputs for accuracy and adherence to data protocols, produce verified savings estimates and provide recommendations for program improvement. The evaluation contractor will provide a design file to the data vendor ahead of Phase V with data completeness, consistency, and accuracy checks. CSPs are required to update data that does not pass the design file criteria.

Figure 5 depicts the data management, QA, and evaluation processes that PECO, the data vendor, CSPs, and independent evaluation contractor will use to facilitate accurate data tracking.

5.2.2 Software Format, Data Exchange Format, and Database Structure

The data tracking system will interact with PECO's existing systems. PECO will provide an initial population of customer, premises, and account data that will be used to qualify customers for programs. Additional data will be entered by the implementation CSP or PECO to complete the application process. PECO will provide a full set of customer data information on a regular basis to update implementation CSP records.

Figure 5. Program Documentation and EM&V



PECO's approach addresses five areas critical to ensuring program implementation quality:

1. **Selection of CSPs that implement programs:** PECO is in the process of selecting and contracting CSPs with demonstrated experience implementing data management protocols and a commitment to maintaining data quality and integrity. Contracts will be awarded based on a pay for performance contracting mechanism.
2. **Program implementation and documentation protocols:** PECO and the CSPs will develop specific protocols and procedures for each program. These will govern all aspects of the program implementation, from procedures for conducting site visits to data input.
3. **Verification and documentation of activities and savings:** Verification of project eligibility and actual installation of measures is important. Documentation of purchases and installations will confirm that programs are implemented in top quality fashion and will provide the basis for defensible program evaluations.
4. **Program evaluation:** PECO will contract an experienced EM&V vendor to conduct an independent assessment of each program's performance. This contractor will develop a comprehensive evaluation plan for conducting process and impact evaluations. The EM&V contractor will work with the SWE to confirm that the evaluations are conducted according to state requirements.
5. **Evaluation-based program adjustments:** PECO will use the findings and recommendations resulting from the impact and process evaluations to adjust program implementation as necessary to confirm the programs are implemented in accordance with recognized best practices, maintain participant satisfaction, and contribute to PECO's successful attainment of its portfolio savings goals.

5.2.3 Describe How CSPs Will Integrate with the Tracking System

CSPs will have a secure log-in to access the tracking system. After logging in, the CSP can enter and submit projects (with required data) for PECO's review, approval, or request for additional information or modifications. Following any required revisions and PECO's approval of a submitted project, projects are maintained within the tracking system.

CSPs will enter information into the tracking system for individual projects and through batch-methods for several projects. Project batches will typically be associated with monthly invoices. CSPs will interact with the tracking system on a monthly basis or more frequently.

The project data submitted and updated by CSPs includes but is not limited to:

- Measure information and equipment specifications
- Inputs for deemed or partially deemed TRM calculations
- Reported savings
- Project status
- Invoices, including project costs and incentives

- Other project details stored in files and not directly entered into a tracking system (e.g., PDFs for custom C&I projects)
- Customer data from PECO's internal customer care and billing system

5.2.4 Access for Commission and SWE

PECO's energy efficiency information will be available for review by the PUC and SWE upon request. As part of the customer validation process for application enrollment, PECO will provide select customer account data to the data management system vendor. This data is highly confidential and must be protected against unauthorized access or disclosure. In addition, all data collected from CSPs related to PECO's programs will be considered confidential and subject to the same protections. Security processes and protocols will be established to secure all data from unauthorized access. PECO and the data management system vendor will jointly develop processes for data backup and disaster recovery.

5.2.5 PECO Cybersecurity Procedures to Protect Program Participant Personally Identifiable Information

As part of Phase V cybersecurity planning, PECO is actively participating in the Act 129 Phase V Data Sharing Working Group, convened by the Pennsylvania PUC under the Phase V Final Order. The group addresses critical topics related to secure data sharing among program administrators, including:

- Inventorying current data-sharing processes
- Identifying data types and associated benefits
- Establishing customer consent requirements
- Developing guidelines for third-party CSPs
- Drafting a standardized Memorandum of Understanding
- Recommending secure storage and exchange protocols (e.g., push vs. pull methods)
- Determining allocation of administrative costs

The initial meeting on July 23, 2025, focused on understanding data needs and sharing expectations among EDCs, the PA DEP, and Commission staff. These discussions also explore safeguarding participant PII, leveraging categorical eligibility, and best practices for collaboration with the PA DEP and Home Energy Rebates programs. PECO will incorporate guidance from the Working Group into its Phase V cybersecurity procedures to support robust data protection and compliance.

6. QA and EM&V

This section explains PECO's approach to EM&V and QA/QC, and how these processes align with SWE activities. Section 6.1 outlines the overall QA/QC strategy and actions for continuous improvement. Section 6.2 details procedures for installation verification, savings documentation, and QC. Section 6.3 describes how PECO will incorporate feedback from participants, contractors, and trade allies. Section 6.4 covers market and process evaluations to assess program effectiveness. Section 6.5 addresses coordination of EM&V activities with the SWE, and Section 6.6 explains how PECO integrates changes to codes and standards into program operations.

6.1 Overall Approach to QA/QC

To implement the programs and solutions in this Plan, PECO will leverage the experience of program implementation professionals by selecting CSPs with the following qualifications:

- Demonstrated experience implementing programs for the specific target market associated with the program.
- Demonstrated understanding of the measures and features of the program and solutions the CSP will implement.
- Existing relationships and experience establishing relationships with upstream equipment suppliers and contractors, as appropriate for the program.
- Experience in providing or coordinating training by other qualified providers about the program, solutions, and measures to delivery channels (e.g., equipment suppliers, contractors, auditors) and the target participant market.
- Capabilities for processing incentives.

The CSPs' approach to QC and continuous improvement will include:

- **Program tracking:** Scorecards, weekly and monthly forecasting reports, and operations meetings will be used to monitor and track program progress against program goals and metrics. The scorecards will be reviewed monthly to provide updates and identify action items to keep the program on track.
- **Responding to customers:** Contractor and trade ally feedback is important. CSPs will have a tiered response procedure to facilitate delivery of the highest level of customer support. Any suggestions or complaints are logged into their customer contact log and resolved at the appropriate level. Complaints are escalated as required following a deliberate and documented process.
- **Equipment installation inspections:** CSPs will conduct random targeted in-process and post inspections while ensuring the quantity of inspections are distributed fairly among the program segments according to their most recent performance. Post inspections will include client interviews and a methodical visual inspection (where possible and feasible) to verify that measures have been installed correctly and as reported. Post inspections will also confirm that those measures comply with program specifications and that those measures are serving their intended function. This enables

personnel to understand and comply with program requirements and provides an opportunity to address any deficiencies early on. Post inspections will be performed as soon as possible after completion of work in a home or building. Prompt QA/QC follow-up creates a greater likelihood of customer cooperation, identify missed opportunities for further improvements, and reinforces the importance of quality and customer satisfaction in the programs. Finally, inspectors will review the appropriateness and accuracy of recommendations made by energy advisors and others.

PECO will also use the experience of an independent EM&V contractor who will conduct unbiased estimations of verified gross energy impacts on all programs. Estimations of verified gross energy impacts will be based on statistically significant verified savings measured as described in the EM&V contractor's EM&V plan, developed prior to Phase IV program implementation.

The contractor's EM&V plan will contain a detailed evaluation methodology for each program, including definition of the impact and process evaluation methods, and the data needed to support them (design file). The EM&V plan will provide the implementation CSP with the data to track and the Database Vendor with the data to house. Having the evaluation plan completed and available to PECO and CSP staff for each program will help establish that the implementers maintain appropriate and high-quality records so that savings can be verified.

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

Although the procedures for measure and project installation verification, QA and QC, and savings documentation will vary by program and measures, PECO anticipates independent evaluation contractors applying the following process to impact evaluations:

1. Choose a random sample of participants for evaluations, using statistical methods consistent with established state protocols.
2. Conduct verifications onsite, by phone, or via online survey instrument, tailored to the measure and program type.
3. Gather pre-evaluation data and prepare data collection documents.
4. Verify measure and project installation and collect pertinent data such as equipment nameplate.
5. Cross-reference equipment data with customer application data contained in the data management system for accuracy.
6. Observe and note equipment operational tests and quality of the equipment installation:
 - a. For prescriptive measures, calculate measure savings using the methodologies and algorithms detailed in the TRM.
 - b. For custom measures, use energy simulation modeling (such as eQuest or DOE-2) or pre-/post-measure metering to determine measure savings.

6.3 Process for Collecting and Addressing Participant, Contractor, and Trade Ally Feedback

PECO anticipates applying the following general process to collect participant, contractor, and trade ally feedback:

- Independent evaluation contractors will interview contractors, trade allies, and other market actors to gauge their satisfaction with PECO's programs and identify areas for improvement.
- Independent evaluation contractors will identify the appropriate survey mode (e.g., telephone, in-person, or online) for capturing participant feedback.
- Independent evaluation contractors will survey a random sample of participants to gather fast program feedback and assess satisfaction with the program.
- Independent evaluation contractors will follow all guidelines outlined in the existing daily load shifting guidance provided as well as the SWE Evaluation Framework for Phase V.

6.4 Market and Process Evaluations

CSPs will regularly evaluate their programs to help maintain best practices and continually improve. Additionally, PECO's independent evaluation contractors will conduct annual market and process evaluations for each program throughout the program's entirety. Market and process evaluations may include program materials review, tracking database analysis, implementation team interviews, surveys or interviews with participating and nonparticipating customers, contractors, and trade allies.

- Market and process evaluations will examine:
 - Program design
 - Implementation protocols and procedures
 - Marketing materials and strategies
 - Outreach and recruitment activities
 - Documentation and compliance with incentive eligibility requirements
 - Processing and timely payment of incentives
 - Market characteristics
 - Net energy and demand savings

PECO will use process evaluation results to improve program design (e.g., modify measures offered, eligibility requirements) and implementation procedures (e.g., modify recruitment, advertising methods, monitoring, database maintenance). The frequency and schedule of the process evaluations will be determined for each program individually.

6.5 Strategy for Coordinating with SWE

PECO's EM&V manager and its independent evaluation contractor will engage with the SWE through scheduled working group meetings and through ad hoc meetings and communications. Throughout Phases I-IV, PECO worked with the SWE to determine that its program evaluations aligned with PUC requirements, clarified policy questions, and contributed data and recommendations to assist the SWE and the PUC to establish policy. PECO anticipates extending this productive relationship in Phase IV.

To the extent feasible and appropriate, PECO will consult with the SWE to establish that its data management system contains information relevant and needed for evaluation of the programs. It also will confirm that PECO's EM&V contractor uses the most appropriate methods for determining the impacts of the EE&C Plan's programs.

6.6 Approach to Incorporating Changes to Codes and Standards

PECO recognizes that changes to federal, state, and local codes and standards can significantly impact the calculation of energy savings and the design of energy efficiency programs. As such, throughout Phase V, PECO and its CSPs will proactively monitor regulatory developments and updates to codes and standards as feasible that may influence baseline assumptions, measure eligibility, or program effectiveness.

7. Cost Recovery Mechanism

The objective of this section is to provide detailed descriptions and estimated values for the cost recovery mechanism. Section 7.1 summarizes total annual revenues for Phase V. Section 7.2 discusses Phase V in accordance with Pennsylvania cost recovery laws. Section 7.3 includes relevant data tables supporting the cost recovery analysis. Section 7.4 addresses tariffs and the Section 1307 cost recovery mechanism. Finally, Section 7.5 discusses ensuring that recovery of Act-129 activities align to the customer class receiving the benefit and Section 7.6 outlines how PECO aims to account for Phase V costs versus prior phase costs, ensuring transparency and compliance with regulatory requirements.

7.1 Total Annual Revenues for Phase V

PECO's annual retail revenue as of December 31, 2006, totals \$4,273,858,275. Applying the 2% annual limit set forth in Act 129 to this amount produces a total allowable annual level of expenditures of \$85,477,166 per year or \$427,385,830 over the five program years of the Phase V Plan.

Figure 6 details how the total 2006 annual retail revenues were derived.³⁴ The electricity sales from all of PECO's customers (FERC Accounts 440.0 through 446.0) and other operating income (FERC Accounts 450.0 through 456.1) were summed. In addition, as required by the Phase V Final Order, the total annual retail revenue was adjusted to include "...generation revenues collected by an EDC for an electric generation supplier (EGS) that use consolidated billing." The revenues thus derived were then adjusted to remove several "non-retail" (i.e., wholesale) revenue items, which include, sales for resales (447.0), other electric revenues (456.0) and revenues from wholesale transmission (456.1).

Figure 6. Calculation of 2006 Annual Revenue

Amount	Description
\$4,371,215,020*	Total revenue as of 12/31/06
\$92,390,366†	Adjustment for "shopping" customers
\$(189,747,111)‡	Wholesale revenue adjustment
\$4,273,858,275§	Total retail revenue
\$85,477,166	Annual spend (2% of revenue)
\$427,385,830#	Five-year total spend

*Source: PUC Annual Report-400 Income Statement

† Source: PECO records

‡ Source: PUC AR Accounts 447, 456.0, 456.1

§ Sum of total revenue, adjustment for "shopping" customers, and wholesale revenue adjustment

|| Total retail revenue times 0.02

Annual spend times five program years

³⁴ The calculation is based on Schedule 400 - Income Statement contained in PECO's 2006 Electric Annual Revenue Report to the PUC.

7.2 Description of Phase V Plan in Accordance with 66 Pa. C.S. § 1307 and 2806.1

Act 129 requires that the EE&C Plan include a cost recovery mechanism to fund EE&C measures and to facilitate the recovery of prudent and reasonable costs, including administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(H). Act 129 also requires an analysis of administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(K). The Phase V Final Order defines administrative costs as including but are not limited to, costs relating to plan and program development, CSP non-incentive program delivery fees, cost-benefit analysis, measurement and verification and reporting.³⁵ Based on this definition, PECO's EE&C Phase IV administrative costs (e.g., non-incentive costs) include those as described in Section 4.2.3.

³⁵ EE&C Phase V Final Order, p. 233.

7.3 Data Tables

Table 38. Budget by Program and Subprogram

Program Name: ¹		Residential					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$13,709	\$14,601	\$15,949	\$17,317	\$14,917	\$76,493
Incentives (\$000)	Rebates	\$4,317	\$4,940	\$5,862	\$6,805	\$5,496	\$27,419
	Upstream/Midstream Buydown	\$1,418	\$1,681	\$2,121	\$2,560	\$1,505	\$9,285
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct-Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$7,060	\$7,952	\$9,300	\$10,667	\$8,270	\$43,248
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912
	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245
Percent Incentives		52%	54%	58%	62%	55%	57%

Program Name:		Residential Home Energy Reports					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989

	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives		0%	0%	0%	0%	0%	0%

Program Name: Low-Income Energy Efficiency							
	Cost Element	PY18	PY19	PY20	PY21	PY22	Phase V Total
	Total Budget (\$000)	\$11,001	\$11,185	\$11,553	\$11,778	\$9,689	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$641	\$641	\$641	\$641	\$641	\$3,205
	Direct Install Materials & Labor	\$6,791	\$6,964	\$7,302	\$7,497	\$5,532	\$34,086
	Braided Funding Support Labor	\$15	\$15	\$15	\$15	\$15	\$77
	Incentive Total	\$7,981	\$8,152	\$8,493	\$8,691	\$6,722	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167
Percent Incentives		73%	73%	74%	74%	69%	73%

Program Name: Income-Eligible Home Energy Reports							
	Cost Element	PY18	PY19	PY20	PY21	PY22	Phase V Total
	Total Budget (\$000)	\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0

	Other	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$172	\$91	\$95	\$85	\$81	\$524
Percent Incentives		0%	0%	0%	0%	0%	0%

Program Name: Non-Residential Energy Efficiency		Total					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$34,179	\$42,508	\$47,045	\$50,850	\$39,342	\$213,923
Incentives (\$000)	Rebates	\$16,168	\$22,512	\$24,396	\$27,998	\$19,270	\$110,345
	Upstream/Midstream Buydown	\$913	\$967	\$1,056	\$948	\$888	\$4,772
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$4,022	\$4,093	\$4,356	\$4,105	\$3,683	\$20,258
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$21,103	\$27,572	\$29,808	\$33,050	\$23,840	\$135,374
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549
Percent Incentives		62%	65%	63%	65%	61%	63%

Table 39. Summary of EE&C Costs by Sector and Program

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost ³ (\$/MWh)	Levelized Cost ⁴ (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other				
Residential Portfolio (incl. Low-Income)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$165	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Low-Income Energy Efficiency	\$34,157,402	\$0	\$0	\$0	\$9,219,670	\$3,073,225	\$0	\$0	\$0	\$46,450,297	\$730	\$157	\$4,614,121
	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total⁵	\$76,998,749	\$0	\$0	\$0	\$48,223,067	\$11,265,136	\$0	\$0	\$0	\$136,486,952	\$301	\$139	\$1,462,398
Small C&I	Non-Residential Energy Efficiency	\$64,986,024	\$0	\$0	\$0	\$34,814,664	\$1,155,777	\$0	\$33,423	\$0	\$100,989,888	\$236	\$72	\$1,473,492
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
	Sector Total	\$68,130,873	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$105,852,912	\$242	\$71	\$1,506,333
Large C&I	Non-Residential Energy Efficiency	\$70,388,160	\$0	\$0	\$0	\$41,142,530	\$1,363,220	\$0	\$39,327	\$0	\$112,933,237	\$206	\$69	\$1,139,321
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
	Sector Total	\$73,533,009	\$0	\$0	\$0	\$42,430,978	\$1,792,948	\$0	\$39,327	\$0	\$117,796,261	\$211	\$68	\$1,167,948

Table 40. Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost (\$)	Basis for Cost Allocation	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Marketing	\$20,400,000	First Year MWh Savings	\$6,382,568	\$6,152,692	\$7,864,741
Administrative	\$4,700,000	First Year MWh Savings	\$1,470,493	\$1,417,532	\$1,811,975
Program Design	\$8,514,690	First Year MWh Savings	\$2,663,999	\$2,568,052	\$3,282,639
EM&V	\$19,600,000	First Year MWh Savings	\$6,132,271	\$5,911,410	\$7,556,320
EDC Delivery Costs	\$11,035,010	First Year MWh Savings	\$3,452,534	\$3,328,187	\$4,254,289
Other ¹	\$3,000,000	First Year MWh Savings	\$938,613	\$904,808	\$1,156,580
Totals	\$67,249,700		\$21,040,478	\$20,282,680	\$25,926,542
SWE Cost	\$0		\$0	\$0	\$0

¹ Includes training, conferences, licenses, travel, and critical contract costs

Table 41. Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs	Total Common Costs	Total of All Costs
Residential (Including Low-Income)	\$136,486,952	\$21,040,478	\$157,527,430
Small C&I	\$105,852,914	\$20,282,680	\$126,135,594
Large C&I	\$117,796,262	\$25,926,542	\$143,722,804
Totals	\$360,136,128	\$67,249,700	\$427,385,830

Table 42. TRC Benefits Table (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	1.00	0.91	\$7,060	\$37,412	\$6,649	\$51,121	\$12,910	\$25,446	\$8,386	\$0	\$46,742
Residential Energy Efficiency	PY19	1.00	0.91	\$7,952	\$43,940	\$6,649	\$58,541	\$14,229	\$29,101	\$9,698	\$0	\$53,027
Residential Energy Efficiency	PY20	1.00	0.77	\$9,300	\$66,073	\$6,650	\$82,023	\$17,089	\$34,389	\$11,903	\$0	\$63,380
Residential Energy Efficiency	PY21	1.00	0.75	\$10,667	\$79,378	\$6,650	\$96,695	\$19,844	\$38,458	\$14,200	\$0	\$72,502
Residential Energy Efficiency	PY22	1.00	0.74	\$8,270	\$47,580	\$6,647	\$62,498	\$12,601	\$24,312	\$9,508	\$0	\$46,421
Residential Energy Efficiency Total		1.00	0.80	\$43,248	\$274,384	\$33,245	\$350,877	\$76,672	\$151,705	\$53,695	\$0	\$282,073
Residential Home Energy Reports	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.00	4.49	\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.00	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income Energy Efficiency	PY19	1.00	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.00	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY21	1.00	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income Energy Efficiency	PY22	1.00	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Energy Efficiency Total		1.00	1.31	\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.00		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	1.00	1.50	\$21,103	\$78,459	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$2	\$168,844
Non-Residential Energy Efficiency	PY19	1.00	1.47	\$27,572	\$108,485	\$14,936	\$150,993	\$65,867	\$155,479	\$109	\$3	\$221,458
Non-Residential Energy Efficiency	PY20	1.00	1.33	\$29,808	\$131,215	\$17,236	\$178,259	\$71,977	\$165,799	\$178	\$3	\$237,957
Non-Residential Energy Efficiency	PY21	1.00	1.41	\$33,050	\$109,621	\$17,799	\$160,470	\$69,134	\$157,817	\$61	\$3	\$227,015
Non-Residential Energy Efficiency	PY22	1.00	1.54	\$23,840	\$76,785	\$15,502	\$116,127	\$54,944	\$124,246	\$80	\$2	\$179,272
Non-Residential Energy Efficiency Total		1.00		\$135,374	\$504,565	\$78,549	\$718,488	\$314,055	\$720,013	\$465	\$14	\$1,034,546
Total		1.00		\$218,663	\$788,296	\$141,473	\$1,148,432	\$429,255	\$974,087	\$64,346	\$14	\$1,467,702

Table 43. TRC Benefits Table (Net)

Portfolio Program/Subprogram	Program Year	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
		NTGR	Net TRC	Incremental Measure Cost Paid by EDC	Measure Cost Paid by Participants	Program Administratio n Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
Residential Energy Efficiency	PY18	0.655	0.86	\$7,060	\$22,078	\$6,649	\$35,787	\$8,459	\$16,672	\$5,495	\$0	\$30,626
Residential Energy Efficiency	PY19	0.655	0.85	\$7,952	\$26,048	\$6,649	\$40,649	\$9,323	\$19,067	\$6,354	\$0	\$34,743
Residential Energy Efficiency	PY20	0.655	0.74	\$9,300	\$40,085	\$6,650	\$56,034	\$11,196	\$22,532	\$7,799	\$0	\$41,527
Residential Energy Efficiency	PY21	0.655	0.72	\$10,667	\$48,331	\$6,650	\$65,648	\$13,002	\$25,198	\$9,304	\$0	\$47,503
Residential Energy Efficiency	PY22	0.655	0.70	\$8,270	\$28,323	\$6,647	\$43,240	\$8,256	\$15,929	\$6,230	\$0	\$30,415
Residential Energy Efficiency Total		0.655		\$43,248	\$164,865	\$33,245	\$241,358	\$50,236	\$99,397	\$35,181	\$0	\$184,814
Residential Home Energy Reports	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.000	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income Energy Efficiency	PY19	1.000	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.000	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
Low-Income Energy Efficiency	PY21	1.000	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income Energy Efficiency	PY22	1.000	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost Paid by EDC	Cost Paid by Participants	Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
Low-Income Energy Efficiency Total		1.000		\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	0.684	1.42	\$21,103	\$47,008	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$2	\$115,506
Non-Residential Energy Efficiency	PY19	0.684	1.40	\$27,572	\$65,505	\$14,936	\$108,013	\$45,059	\$106,363	\$75	\$2	\$151,499
Non-Residential Energy Efficiency	PY20	0.684	1.28	\$29,808	\$80,347	\$17,236	\$127,392	\$49,240	\$113,423	\$122	\$2	\$162,787
Non-Residential Energy Efficiency	PY21	0.684	1.35	\$33,050	\$64,551	\$17,799	\$115,400	\$47,295	\$107,963	\$42	\$2	\$155,301
Non-Residential Energy Efficiency	PY22	0.684	1.45	\$23,840	\$44,998	\$15,502	\$84,340	\$37,587	\$84,996	\$55	\$2	\$122,640
Non-Residential Energy Efficiency Total		0.684		\$135,374	\$302,408	\$78,549	\$516,332	\$214,845	\$492,561	\$318	\$9	\$707,733
Total		0.73		\$218,663	\$476,620	\$141,473	\$836,756	\$303,609	\$694,326	\$45,685	\$9	\$1,043,630

7.4 Tariffs and Section 1307 Cost Recovery Mechanism for Phase V Plan

As part of the implementation of PECO's Phase V EE&C Plan, PECO proposes to use a cost recovery mechanism similar to the one it used to recover the cost of its Phase IV Plan. See PECO Statement No. 4, Exhibit MAM-1, for a copy of the proposed supplement to PECO's Electric Service Tariff that contains the tariff provisions designed to implement the cost recovery mechanism for PECO's proposed Phase V EE&C Plan.

A high-level summary description of the Phase V cost recovery mechanism was provided in Section 1.9. Additional details on the Phase V cost recovery mechanism, calculations of the charge, and supporting cost documentation are provided in this section.

7.4.1 Cost Recovery Mechanism

PECO proposes to recover the cost of its Phase V EE&C Plan through an Energy Efficiency & Conservation Program Charge (EEPC) similar to the one used in Phase IV. The Phase IV EEPC was designed to comply with Section 1307 of the Public Utility Code and, as the Commission required, was reconcilable and non-bypassable. As required by the Commission in PECO's previous EE&C final implementation orders, the EEPC was not to be a separate line item on residential customers' bills and not included in the price to compare. Instead, residential customers' distribution rates were adjusted by the amount of the EEPC charge calculated for each rate class. For SCI customers, the EEPC was based on energy use or kWh. For large commercial customers, the charge was based on a PJM Peak Load Contribution (PLC). The EEPC was listed as a separate item on SCI and LCI customers' bills and was not included in the price to compare. For the Phase V EE&C Plan, PECO proposes to follow the same format as used in Phase IV.

The cost recovery mechanism for Phase V is shown in the proposed supplement to PECO's Electric Service Tariff submitted as PECO Exhibit MAM-1. The tariff language describes the cost recovery method, the formula for calculating the charge, and the charges specific to each rate class.

The Phase V EEPC will recover all of the fixed capital costs (depreciation and pre-tax return) and operating expenses, not otherwise recovered in base rates, to design and implement the EE&C programs incorporated in its Phase V EE&C Plan. These costs include, among others, the cost of information technology (IT) needed to design and implement the EE&C programs; the costs of customer outreach and program promotion; incremental labor costs incurred to manage and administer the EE&C programs on an ongoing basis; the cost to measure and verify EE&C program results; and the cost of incentives offered to customers to participate in the approved EE&C programs. PECO Exhibit MAM-2 contains a summary of the projected expenditures for each of the programs across these rate classes.

In accordance with the Phase V Final Order, PECO is required to establish a cost recovery methodology for Phase V that is designed to recover, on an annual basis, projected program costs that it anticipates will be incurred over each surcharge application year. In addition, PECO is required to reconcile actual expenses incurred with actual revenues received for the reconciliation period. For PY18 (2026/27), the cost recovery rates are being calculated based on

the projected total program expenditures allocated to each rate class for that program year plus the reconciliation amount for PY17 (2025/26) and any costs remaining from previous periods. To develop the recovery charge for each rate class for PY18 (2026/27), the total expenditure for that class was divided by the appropriate projected class billing units for the period from June 1, 2026, through May 31, 2027. Subsequently, PECO will develop Phase V recovery rates annually based on the projected program expenditures for that program year plus reconciliation amounts for previous periods. The charge that was calculated per billing unit for each rate class was grossed up to provide for recovery of Pennsylvania Gross Receipts Tax. This calculation produces a charge that, net of Pennsylvania Gross Receipts Tax, will recover the projected total expenditures over the recovery period.

The Phase V Final Order also requires PECO to remove the SWE costs from the EE&C Phase V budget in the same manner as was done in Phase IV. PECO will, therefore, track the Phase V SWE costs separately from its EE&C costs but will still recover such costs through its Phase V EEPC.

The Phase V SWE costs will be determined through an RFP bidding process. Until the final SWE costs are known, PECO has included an estimate. PECO Exhibit MAM-3 contains the detailed calculations for the development of the EEPC charges for each class as well as the SWE costs, which are reflected as a separate line item.

7.5.2 True-Up

As noted earlier, PECO's Phase V EEPC will be reconciled on an annual basis to account for any under- or over-recovery from the prior year. As the Phase V Final Order specifies, PECO will reconcile its total actual recoverable EE&C Plan expenditures incurred through March 31, 2026, with its actual EE&C Plan revenues received through March 31, 2026. The net over- or under-recovery shall be reflected (without interest) as a separate line item of the E factor calculation of the Phase V rates to become effective June 1, 2026. These rates will also include, as a separate line item, PECO's projection of its expenses related to Phase IV program implementation incurred in April and May 2026, including projected expenses to finalize any measures installed and commercially operable on or before May 31, 2026; projected expenses to finalize any contracts; and other Phase IV administrative obligations. The difference between PECO's projected and actual expenses and EEPC revenue for the months of April and May 2026 will be presented as clearly identified, separate line items in the reconciliation statement for the period April 1, 2026, through March 31, 2027.

7.5 Ensuring Recovery Alignment with Benefitting Customer Classes

PECO's cost recovery mechanism for its EE&C Plan is designed to ensure that measures are paid for by the same customer class(es) that receive the associated measures' EE&C benefits. This is accomplished by creating separate EE&C charges for the residential class, SCI class, LCI class, and Municipal Lighting class.³⁶ Incentives and program costs are tracked independently for each class to maintain transparency and accurate allocation. Project

³⁶ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

management and data systems monitor cost flows and compliance, integrating with CSP reporting for oversight.

See PECO Exhibits MAM-2 and MAM-3, which list the program costs by rate class and for the spreadsheet that shows how the EEPC was developed for each customer class according to the method just described. PECO proposes to start the recovery period for Phase V with bills sent to customers during July 2026 (June usage) and will continue through bills sent to customers in June 2031 (May usage).

7.6 Accounting for Phase V Costs versus Prior Phase Costs

In accordance with the Phase V Filing Template provided with the Commission's Secretarial Letter dated September 8, 2025, at Docket No. M-2025-3052826, PECO must provide a description of how it will account for Phase V costs separately from costs incurred in prior phases.³⁷ To satisfy this requirement, PECO will do the following:

- Account for the Phase V costs and revenues on its books separately from prior phases by setting up new general ledger accounts for Phase V costs and revenues so that there will be no comingling of prior phase costs and Phase V costs or funds in PECO's accounting records.
- Clearly and separately identify and track prior phase costs and revenues in the EEPC cost recovery and reconciliation mechanism so that Phase V costs will be reconciled against the Phase V funds collected. See the description of the cost recovery mechanism in the proposed supplement to PECO's Electric Service Tariff provided as PECO Exhibit MAM-1.

³⁷ EE&C Phase V Filing Template Secretarial Letter, issued September 8, 2025.

8. Cost-Effectiveness

This section provides an overview of the cost-effectiveness framework for Phase V. Section 8.1 details avoided costs. Section 8.2 confirms the values used for the real discount rate and nominal discount rate. Section 8.3 discusses the cost-effectiveness analysis approach. Section 8.3 provides cost-effectiveness information for Phase V, including supporting data tables.

8.1 Avoided Costs

The following sections report on the avoided capacity and energy costs that were used to conduct the cost-effectiveness analysis. PECO developed data inputs to support the avoided cost analysis based on direction from the PUC in the TRC Order.

PECO used the SWE's Avoided Cost Calculator to develop avoided cost inputs as directed in the PUC TRC Order. The final PECO Avoided Cost Calculator is included in Appendix E.

8.2 Confirm Use of 3% Real Discount Rate and 5% Nominal Discount Rate

PECO used a real discount of 3% for cost test modeling as directed in the PUC TRC Order.

8.3 Cost-Effectiveness Analysis Approach

The cost-effectiveness results in this Plan follow PUC specifications outlined in the 2026 TRC Order issued November 7, 2024. PECO calculates the TRC test at the measure, program, and portfolio levels. Key elements of the TRC Order include:

- Measure life capped at 15 years
- Use of gross and net energy and demand savings for benefit-cost purposes
- Inclusion of quantifiable savings in fossil fuels, water consumption, and operations and maintenance (O&M) benefits

At the measure level, the TRC test compares lifetime benefits—calculated by multiplying annual savings by avoided costs for each year and discounting to present value—with lifetime costs, including incremental capital, installation, and O&M. Program-level TRC adds CSP and PECO delivery costs, while portfolio-level TRC includes all program costs plus portfolio-wide common costs. A ratio of benefits to costs ≥ 1 indicates cost-effectiveness.

PECO also screens the proposed measure mix economically using the TRC test. Although not all measures must pass individually, the overall portfolio must meet cost-effectiveness requirements. This approach supports a comprehensive mix of energy and demand savings measures for all customers while maintaining compliance.

8.4 Data Tables

Table 44Error! Reference source not found. and Table 45Error! Reference source not found. contains data tables as required by the PUC EE&C Plan template.

Table 44. TRC Benefits (Gross)

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	1.00	0.91	\$7,060	\$37,412	\$6,649	\$51,121	\$12,910	\$25,446	\$8,386	\$0	\$46,742
Residential Energy Efficiency	PY19	1.00	0.91	\$7,952	\$43,940	\$6,649	\$58,541	\$14,229	\$29,101	\$9,698	\$0	\$53,027
Residential Energy Efficiency	PY20	1.00	0.77	\$9,300	\$66,073	\$6,650	\$82,023	\$17,089	\$34,389	\$11,903	\$0	\$63,380
Residential Energy Efficiency	PY21	1.00	0.75	\$10,667	\$79,378	\$6,650	\$96,695	\$19,844	\$38,458	\$14,200	\$0	\$72,502
Residential Energy Efficiency	PY22	1.00	0.74	\$8,270	\$47,580	\$6,647	\$62,498	\$12,601	\$24,312	\$9,508	\$0	\$46,421
Residential Energy Efficiency Total		1.00	0.80	\$43,248	\$274,384	\$33,245	\$350,877	\$76,672	\$151,705	\$53,695	\$0	\$282,073
Residential Home Energy Reports	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.00	4.49	\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.00	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY19	1.00	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.00	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
Low-Income Energy Efficiency	PY21	1.00	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income Energy Efficiency	PY22	1.00	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Energy Efficiency Total		1.00	1.31	\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.00		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	1.00	1.50	\$21,103	\$78,459	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$2	\$168,844
Non-Residential Energy Efficiency	PY19	1.00	1.47	\$27,572	\$108,485	\$14,936	\$150,993	\$65,867	\$155,479	\$109	\$3	\$221,458
Non-Residential Energy Efficiency	PY20	1.00	1.33	\$29,808	\$131,215	\$17,236	\$178,259	\$71,977	\$165,799	\$178	\$3	\$237,957
Non-Residential Energy Efficiency	PY21	1.00	1.41	\$33,050	\$109,621	\$17,799	\$160,470	\$69,134	\$157,817	\$61	\$3	\$227,015
Non-Residential Energy Efficiency	PY22	1.00	1.54	\$23,840	\$76,785	\$15,502	\$116,127	\$54,944	\$124,246	\$80	\$2	\$179,272

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Non-Residential Energy Efficiency Total		1.00		\$135,374	\$504,565	\$78,549	\$718,488	\$314,055	\$720,013	\$465	\$14	\$1,034,546
Total		1.00		\$218,663	\$788,296	\$141,473	\$1,148,432	\$429,255	\$974,087	\$64,346	\$14	\$1,467,702

Table 45. TRC Benefits (Net)

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	0.655	0.86	\$7,060	\$22,078	\$6,649	\$35,787	\$8,459	\$16,672	\$5,495	\$0	\$30,626
Residential Energy Efficiency	PY19	0.655	0.85	\$7,952	\$26,048	\$6,649	\$40,649	\$9,323	\$19,067	\$6,354	\$0	\$34,743
Residential Energy Efficiency	PY20	0.655	0.74	\$9,300	\$40,085	\$6,650	\$56,034	\$11,196	\$22,532	\$7,799	\$0	\$41,527
Residential Energy Efficiency	PY21	0.655	0.72	\$10,667	\$48,331	\$6,650	\$65,648	\$13,002	\$25,198	\$9,304	\$0	\$47,503
Residential Energy Efficiency	PY22	0.655	0.70	\$8,270	\$28,323	\$6,647	\$43,240	\$8,256	\$15,929	\$6,230	\$0	\$30,415
Residential Energy Efficiency Total		0.655		\$43,248	\$164,865	\$33,245	\$241,358	\$50,236	\$99,397	\$35,181	\$0	\$184,814
Residential Home Energy Reports	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost			Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants	Program Administration Cost						
Residential Home Energy Reports	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.000	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income Energy Efficiency	PY19	1.000	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.000	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
Low-Income Energy Efficiency	PY21	1.000	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income Energy Efficiency	PY22	1.000	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Energy Efficiency Total		1.000		\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	0.684	1.42	\$21,103	\$47,008	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$2	\$115,506

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost			Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants	Program Administration Cost						
Non-Residential Energy Efficiency	PY19	0.684	1.40	\$27,572	\$65,505	\$14,936	\$108,013	\$45,059	\$106,363	\$75	\$2	\$151,499
Non-Residential Energy Efficiency	PY20	0.684	1.28	\$29,808	\$80,347	\$17,236	\$127,392	\$49,240	\$113,423	\$122	\$2	\$162,787
Non-Residential Energy Efficiency	PY21	0.684	1.35	\$33,050	\$64,551	\$17,799	\$115,400	\$47,295	\$107,963	\$42	\$2	\$155,301
Non-Residential Energy Efficiency	PY22	0.684	1.45	\$23,840	\$44,998	\$15,502	\$84,340	\$37,587	\$84,996	\$55	\$2	\$122,640
Non-Residential Energy Efficiency Total		0.684		\$135,374	\$302,408	\$78,549	\$516,332	\$214,845	\$492,561	\$318	\$9	\$707,733
Total		0.73		\$218,663	\$476,620	\$141,473	\$836,756	\$303,609	\$694,326	\$45,685	\$9	\$1,043,630

9. Plan Compliance Information and Other Key Issues

This section contains additional required compliance items and addresses key issues in EE&C Plan, portfolio, and program design. Section 9.1 includes how PECO will comply with Plan requirements, including low-income requirements, spending on pilots, and the midstream delivery documentation process. Section 9.2 discusses other key issues such as long-term sustainability impacts, how customer education will be carried out, and how public reporting of Act 129 activities will be handled.

9.1 Plan Compliance Considerations

9.1.1 Description of Plan

As Section 3 of this document details, PECO's EE&C Plan provides energy efficiency programs to each of its customer classes, including two specific programs for low-income households.³⁸ PECO's programs are equitably provided across its customer classes consistent with the Phase V Final Order.

9.1.2 Statement Delineating the EE&C Plan

PECO's Plan is projected to achieve the savings detailed in Section 1 by the end of Phase V. The EE&C Plan is projected to achieve Phase V's energy and demand savings requirements through a broad array of financial incentives. These incentives will be provided to PECO's customers through CSPs, installation companies, and trade allies (e.g., HVAC contractors and retail stores).

9.1.3 Low-Income Requirements

PECO's EE&C Plan will meet the low-income requirements by building on its low-income programs in Phase IV. The Phase V Final Order highlights the importance of collaboration between LIURP and Act 129 for all utilities. The CSP for the Residential program will continue its existing partnerships with the LIURP, Philadelphia Gas Works, and Philadelphia Water Department. To meet the required demand reduction targets, PECO envisions a much higher participation level of electrically heated homes in Phase V. The Plan includes free energy checkups with no cost install measures and free electric heat assessments with no cost measures. PECO's Plan is designed to exceed the minimum requirement that 74,456 MWh come from the two dedicated low-income subprograms and the low-income portion of multifamily through the Residential program.³⁹

³⁸ Consistent with Act 129, PECO's low-income household definition is households at or below 150% of the Federal poverty income guidelines. See 66 Pa.C.S. 2806.1(b)(1)(i)(B).

³⁹ See PECO's discussion in Sections 3 and 4 of this document for a detailed description of its EE&C programs and its implementation strategy.

9.1.4 Spending on Experimental Equipment or Devices Limited to 2% of Funds

PECO confirms that spending on experimental equipment and devices, including pilot projects, will be capped at 2% of the overall budget. As part of this filing, PECO proposes two residential pilot programs, further described below. The Residential CSP will perform both pilots.

Heat Pump Load Shifting Pilot

PECO proposes a residential pilot to test hybrid heat pump load-shifting capabilities PECO is uniquely positioned as a dual-fuel utility and seeks to leverage natural gas resources within its service territory to achieve PDRs. As PECO's system is primarily summer peaking, the Company recognizes that achieving meaningful winter peak demand reductions presents unique challenges.

This pilot program focuses on customers utilizing hybrid heat pump systems that integrate both electric and gas heating capabilities. The objective is to evaluate the feasibility of time-based control strategies for winter peak daily load shifting. Specifically, the program will transition heating operation from the electric system to the gas system during PECO's peak hours. This approach will provide valuable insights into the operational effectiveness of time-based controls for hybrid systems as a demand-side management tool and inform future strategies for optimizing these resources. Further details on this pilot are provided in Table 46.

Table 46. Hybrid Heat Pump Load Shifting Pilot

Pilot Design	Hybrid heat pump systems present an opportunity to serve as a daily load-shifting resource. During peak demand periods, these systems can be controlled to temporarily disable the electric heat pump and rely solely on the gas furnace for heating.
Hypothesis Being Tested	Are time-based controls for hybrid heat pumps an effective method to reduce electric peak demand reduction during winter peak hours?
Budget	\$1.6 million
Participation Estimates	200 customers ⁴⁰
Estimated Savings	600 kW ⁴¹ total 3 kW per customer
Estimated Timeline	Fall 2027 – Fall 2028

Low- and Moderate- Income Pilot

PECO proposes a pilot designed to expand access to energy efficiency opportunities for Low- to Moderate- Income (LMI) customers, defined as customers earning between 151% and 250% of the Federal Poverty Level. This segment often faces barriers to participating in traditional energy efficiency programs, despite having significant energy burden and savings potential.

⁴⁰ PECO's Residential CSP will source these customers from heating and cooling system data that is available through smart thermostat data in collaboration with manufacturing partners.

⁴¹ Value estimated based on a typical heat pump power draw in the winter for a typical system during peak hours.

Table 47. Low- and Moderate-Income Pilot

Pilot Design	Over a pilot term of up to 24 months, PECO will identify, implement, and track comprehensive energy efficiency measures for participating LMI customers while supporting the Company's overall energy savings objectives. In addition to delivering measurable efficiency impacts, the pilot will test and refine incentive designs, marketing approaches, and enrollment processes that improve customer participation and installation of comprehensive measures.
Hypothesis Being Tested	What incentive levels are needed to support participation from LMI customers? What marketing tactics are effective to reach LMI customers? What verification procedures are needed to identify LMI customer eligibility?
Budget	\$1 million
Participation Estimates	Up to 100 customers
Estimated Savings	Up to 300 MWh total Up to 3 MWh per customer Per Unit savings will depend on the treatments installed. Eligible treatments may include, but are not limited to: • Ductless Mini Split Heat Pumps: ~800 kWh/unit • Heat Pump Water Heaters: ~1700 kWh/unit • Building Shell Measures (Duct Sealing and Duct Insulation, Residential Air Sealing): ~200 kWh - 500 kWh/unit
Estimated Timeline	Fall 2027 – Fall 2029

9.1.5 Competitively Neutral to All Electric Distribution Customers

PECO's EE&C program suite will be available to all PECO customers, regardless of whether they receive generation supply from PECO as a default service provider or from an EGS. To ensure equitable access to program benefits and prudent use of ratepayer funds, PECO may establish maximum incentive limits for individual projects. These limits are designed to prevent any single project from disproportionately utilizing available funding, while maintaining compliance with Act 129 objectives and supporting broad participation across customer classes.

9.1.6 Midstream Delivery Documentation Process

PECO will work with its non-residential CSP to confirm that midstream delivery of lighting minimizes like-for-like LED replacements. Participating distributors will be required to:

- **Confirm at the point of sale** that the replaced equipment is non-LED and certify installation within 90 days, in alignment with current program standards.
- **Provide mandatory baseline documentation** through the midstream upload template, including details such as existing fixture type, to confirm accurate data capture.
- **Undergo compliance verification**, which includes randomized post-installation checks—both phone and onsite—within 90 days of purchase. Sample sizes will be adjusted based on risk factors such as distributor performance or anomalies in transaction data.
- **Follow enhanced QA/QC protocols**, including automated flags for duplicate projects or missing baseline data, and annual compliance audits.
- **Complete mandatory training** on documentation requirements and program rules, reinforced through periodic refreshers and performance reviews.

The midstream platform will track transactions and verification status, providing transparency and reporting to PECO and evaluators. Distributors that fail to meet compliance standards will be subject to corrective action plans or removal from the program. This multi-layered approach to combine front-end controls, back-end verification, and ongoing distributor engagement facilitates midstream lighting incentives that deliver real, attributable savings and supports program integrity.

9.2 Other Key Issues

9.2.1 Describe How This EE&C Plan Will Lead to Long-Term, Sustainable Energy Efficiency Savings in the EDC's Service Territory and in Pennsylvania

PECO's EE&C Plan was developed to meet or exceed the requirements of Act 129 and the Phase V Final Order. In developing the Phase V EE&C Plan, PECO combined its own experience implementing programs in Phases I - IV with lessons learned from utility demand side management programs in other jurisdictions around the country and worked with CSPs to design the programs. The proposed Plan includes a variety of proven programs and components effective across all customer classes. PECO believes that providing programs along with comprehensive education will lead to long-term sustainability through ongoing customer participation.

9.2.2 Describe, by Sector, How the EDC Will Address Customer Education for Its Programs

To educate customers on energy efficiency, PECO will conduct outreach to schools, work with community partners, speak with groups, staff tables at events, and reach diverse communities. It also will send emails to customers, distribute program materials, and canvas neighborhoods. PECO has strong relationships with numerous community organizations who, through annual sponsorships and other partner-specific programs, help spread the word to their constituents about energy efficiency.

To help educate customers about heat pumps, PECO will include heat pump-specific

technology content within its customer newsletter (bill insert) twice a year as part of seasonal readiness communications. Content will include the benefits of heat pump technology and proper maintenance instructions. PECO will provide a post-installation email to customers with instructions on proper temperature settings and an overview of how heat pump technology works with tips regarding minimization of auxiliary heat systems and proper maintenance (sourced by ENERGY STAR).

9.2.3 Describe How the EDC Will Provide the Public with Information about the Results from the Programs

PECO will periodically issue press releases to inform the public of the progress of its EE&C Plan and refer the public to where reports about PECO's Act 129 results are posted on the PUC's website. PECO will only provide information to the public after the SWE completes its review and approves PECO's annual reports.

10. Appendices

Appendix A. CSP Contracts

PECO has bid out all CSP contracts. Each winning CSP resulting in a signed contract will be filed with the PUC as required. No CSP contract will be effective until it is approved by the PUC.

Appendix B. Calculation Methods and Assumptions

Total Resource Cost Test Calculation Methods

Benefit-cost analysis of PECO's portfolio of energy efficiency programs was conducted through the use of a comprehensive benefit-cost screening tool. The tool uses the most recent savings values and inputs from the 2026 TRM. The tool uses inputs at the individual measure level (electric savings, incremental cost, participation levels, avoided costs, and energy costs) to calculate measure level savings and cost-effectiveness. The savings at the measure-level are subtotaled for each program and sector and finally for the portfolio. At the program and sector level the model calculates program level cost-effectiveness, program incentive and non-incentive costs, total program costs. The outputs are compared against target savings goals, spending caps, and cost-effectiveness limits.

The TRC test was the primary test used to analyze the cost-effectiveness of PECO's energy efficiency portfolio. The TRC test measures the total net resource expenditures of an energy efficiency program from the point of view of the utility and its ratepayers. Resource costs include changes in supply and participant costs. A program that passes this test (i.e., a ratio greater than 1.0) is viewed as beneficial to the utility and its customers because the savings in electric costs outweigh the costs incurred by the utility and its customers. Of particular note, per the PA PUC guidelines, measure lifetime is capped at 15 years, and non-electric benefits are included in the savings calculations (e.g. complementary natural gas savings from an electric efficiency measure). The following section outlines Guidehouse's methodology for conducting the cost-effectiveness analysis including an explanation of key inputs and assumptions.

Incremental Measure Costs

Estimates of incremental measure costs were developed using the 2026 SWE IMC Database. Additionally, expert judgement from PECO's implementation contractors were used to refine saving and cost estimates where appropriate, such as for direct install measures where actual costs may be used.

Incentive Costs

Incentive amounts for each measure were developed using industry standards benchmarks. These initial estimates were further refined based on careful consideration of the market for each measure or set of measures.

Administrative Costs

To determine the administrative costs, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include program design, administrative spending, EDC delivery costs, CSP delivery fees, marketing, EM&V, AEPS registration support and other expenditures.

Appendix C. Program by Program Savings, Costs, and TRC Results

Table 48. Summary of EE&C Costs by Sector and Program

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost ³ (\$/MWh)	Levelized Cost ⁴ (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other				
Residential Portfolio (incl. Low-Income)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$165	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Low-Income Energy Efficiency	\$34,157,402	\$0	\$0	\$0	\$9,219,670	\$3,073,225	\$0	\$0	\$0	\$46,450,297	\$730	\$157	\$4,614,121
	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total⁵	\$76,998,749	\$0	\$0	\$0	\$48,223,067	\$11,265,136	\$0	\$0	\$0	\$136,486,952	\$301	\$139	\$1,462,398
Small C&I	Non-Residential Energy Efficiency	\$64,986,024	\$0	\$0	\$0	\$34,814,664	\$1,155,777	\$0	\$33,423	\$0	\$100,989,888	\$236	\$72	\$1,473,492
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
	Sector Total	\$68,130,873	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$105,852,912	\$242	\$71	\$1,506,333
Large C&I	Non-Residential Energy Efficiency	\$70,388,160	\$0	\$0	\$0	\$41,142,530	\$1,363,220	\$0	\$39,327	\$0	\$112,933,237	\$206	\$69	\$1,139,321
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577

	Low-Income Energy Efficiency	\$2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,378,317	\$488	\$21	\$2,687,652
	Sector Total	\$73,533,009	\$0	\$0	\$0	\$42,430,978	\$1,792,948	\$0	\$39,327	\$0	\$117,796,261	\$211	\$68	\$1,167,948

Table 49. Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost (\$)	Basis for Cost Allocation	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Marketing	\$20,400,000	First Year MWh Savings	\$6,382,568	\$6,152,692	\$7,864,741
Administrative	\$4,700,000	First Year MWh Savings	\$1,470,493	\$1,417,532	\$1,811,975
Program Design	\$8,514,690	First Year MWh Savings	\$2,663,999	\$2,568,052	\$3,282,639
EM&V	\$19,600,000	First Year MWh Savings	\$6,132,271	\$5,911,410	\$7,556,320
EDC Delivery Costs	\$11,035,010	First Year MWh Savings	\$3,452,534	\$3,328,187	\$4,254,289
Other ¹	\$3,000,000	First Year MWh Savings	\$938,613	\$904,808	\$1,156,580
Totals	\$67,249,700		\$21,040,478	\$20,282,680	\$25,926,542
SWE Cost	\$0		\$0	\$0	\$0

¹ Includes training, conferences, licenses, travel, and critical contract costs

Table 50. Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs	Total Common Costs	Total of All Costs
Residential (Including Low-Income)	\$136,486,952	\$21,040,478	\$157,527,430
Small C&I	\$105,852,914	\$20,282,680	\$126,135,594
Large C&I	\$117,796,262	\$25,926,542	\$143,722,804
Totals	\$360,136,128	\$67,249,700	\$427,385,830

Table 51. TRC Benefits (Gross)

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	1.00	0.91	\$7,060	\$37,412	\$6,649	\$51,121	\$12,910	\$25,446	\$8,386	\$0	\$46,742
Residential Energy Efficiency	PY19	1.00	0.91	\$7,952	\$43,940	\$6,649	\$58,541	\$14,229	\$29,101	\$9,698	\$0	\$53,027
Residential Energy Efficiency	PY20	1.00	0.77	\$9,300	\$66,073	\$6,650	\$82,023	\$17,089	\$34,389	\$11,903	\$0	\$63,380
Residential Energy Efficiency	PY21	1.00	0.75	\$10,667	\$79,378	\$6,650	\$96,695	\$19,844	\$38,458	\$14,200	\$0	\$72,502
Residential Energy Efficiency	PY22	1.00	0.74	\$8,270	\$47,580	\$6,647	\$62,498	\$12,601	\$24,312	\$9,508	\$0	\$46,421
Residential Energy Efficiency Total		1.00	0.80	\$43,248	\$274,384	\$33,245	\$350,877	\$76,672	\$151,705	\$53,695	\$0	\$282,073
Residential Home Energy Reports	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.00	4.49	\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.00	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income Energy Efficiency	PY19	1.00	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.00	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745
Low-Income Energy Efficiency	PY21	1.00	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381

Portfolio		NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY22	1.00	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Energy Efficiency Total		1.00	1.31	\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.00		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	1.00	1.50	\$21,103	\$78,459	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$2	\$168,844
Non-Residential Energy Efficiency	PY19	1.00	1.47	\$27,572	\$108,485	\$14,936	\$150,993	\$65,867	\$155,479	\$109	\$3	\$221,458
Non-Residential Energy Efficiency	PY20	1.00	1.33	\$29,808	\$131,215	\$17,236	\$178,259	\$71,977	\$165,799	\$178	\$3	\$237,957
Non-Residential Energy Efficiency	PY21	1.00	1.41	\$33,050	\$109,621	\$17,799	\$160,470	\$69,134	\$157,817	\$61	\$3	\$227,015
Non-Residential Energy Efficiency	PY22	1.00	1.54	\$23,840	\$76,785	\$15,502	\$116,127	\$54,944	\$124,246	\$80	\$2	\$179,272
Non-Residential Energy Efficiency Total		1.00		\$135,374	\$504,565	\$78,549	\$718,488	\$314,055	\$720,013	\$465	\$14	\$1,034,546
Total		1.00		\$218,663	\$788,296	\$141,473	\$1,148,432	\$429,255	\$974,087	\$64,346	\$14	\$1,467,702

Table 52. TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	0.655	0.86	\$7,060	\$22,078	\$6,649	\$35,787	\$8,459	\$16,672	\$5,495	\$0	\$30,626
Residential Energy Efficiency	PY19	0.655	0.85	\$7,952	\$26,048	\$6,649	\$40,649	\$9,323	\$19,067	\$6,354	\$0	\$34,743
Residential Energy Efficiency	PY20	0.655	0.74	\$9,300	\$40,085	\$6,650	\$56,034	\$11,196	\$22,532	\$7,799	\$0	\$41,527
Residential Energy Efficiency	PY21	0.655	0.72	\$10,667	\$48,331	\$6,650	\$65,648	\$13,002	\$25,198	\$9,304	\$0	\$47,503
Residential Energy Efficiency	PY22	0.655	0.70	\$8,270	\$28,323	\$6,647	\$43,240	\$8,256	\$15,929	\$6,230	\$0	\$30,415
Residential Energy Efficiency Total		0.655		\$43,248	\$164,865	\$33,245	\$241,358	\$50,236	\$99,397	\$35,181	\$0	\$184,814
Residential Home Energy Reports	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.000	1.35	\$7,981	\$1,874	\$3,020	\$12,875	\$3,273	\$12,094	\$1,980	\$0	\$17,347
Low-Income Energy Efficiency	PY19	1.000	1.35	\$8,152	\$1,837	\$3,033	\$13,022	\$3,112	\$12,395	\$2,022	\$0	\$17,529
Low-Income Energy Efficiency	PY20	1.000	1.33	\$8,493	\$1,769	\$3,060	\$13,322	\$3,124	\$12,531	\$2,090	\$0	\$17,745

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY21	1.000	1.29	\$8,691	\$1,728	\$3,087	\$13,506	\$3,056	\$12,184	\$2,141	\$0	\$17,381
Low-Income Energy Efficiency	PY22	1.000	1.23	\$6,722	\$2,140	\$2,966	\$11,828	\$2,508	\$10,091	\$1,952	\$0	\$14,551
Low-Income Energy Efficiency Total		1.000		\$40,040	\$9,347	\$15,167	\$64,554	\$15,072	\$59,294	\$10,186	\$0	\$84,552
Low-Income Home Energy Reports	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	0.684	1.42	\$21,103	\$47,008	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$2	\$115,506
Non-Residential Energy Efficiency	PY19	0.684	1.40	\$27,572	\$65,505	\$14,936	\$108,013	\$45,059	\$106,363	\$75	\$2	\$151,499
Non-Residential Energy Efficiency	PY20	0.684	1.28	\$29,808	\$80,347	\$17,236	\$127,392	\$49,240	\$113,423	\$122	\$2	\$162,787
Non-Residential Energy Efficiency	PY21	0.684	1.35	\$33,050	\$64,551	\$17,799	\$115,400	\$47,295	\$107,963	\$42	\$2	\$155,301
Non-Residential Energy Efficiency	PY22	0.684	1.45	\$23,840	\$44,998	\$15,502	\$84,340	\$37,587	\$84,996	\$55	\$2	\$122,640
Non-Residential Energy Efficiency Total		0.684		\$135,374	\$302,408	\$78,549	\$516,332	\$214,845	\$492,561	\$318	\$9	\$707,733
Total		0.73		\$218,663	\$476,620	\$141,473	\$836,756	\$303,609	\$694,326	\$45,685	\$9	\$1,043,630

Appendix D. Avoided Cost Calculator

PECO created the avoided costs after gathering publicly available data sets as inputs to support the avoided cost analysis. PECO followed direction from the PUC in the TRC Order. We have organized the information according to the tabs in the PUC's Excel avoided cost calculator.

General Instructions

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator

This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references.

For Phase V, the start year shall be set to Program Year 18 (6/1/2026 - 5/31/2027).

The user shall gather publicly available data sets as inputs.

This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section	Input Tab
EDC Name		General Inputs
Start Year		General Inputs
Inflation Rate	A.7 Page 8	General Inputs
Plant Heat Rates	B.2.b.v Page 18	General Inputs
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15	Elec Futures
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15	Elec Futures
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16	NG Futures
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16	NG Futures
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16	Adjustments
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18	BLS Input
PJM Base Residual Auction Results	B.7 Page 21	Generation Capacity
Transmission and Distribution Capacity Costs	B.8 Page 22	T&D Capacity
AEPS Avoided Costs	B.9 Page 24	AEPS
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25	DRIPE
Benefits Incurred Through Reduced Arrearages Activity	B.12 Page 29	Arrearages

Monetary Issues:	All output dollars are nominal
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

General Inputs

General			Calendar			
Company Name	PECO		Act 129 PY	PY Start	PY End	Avoided Energy YR
Start Year (Program)	18	2027	18	2026	2027	2027
Discount Rate	5%	TRC Test Order A.4 page 10	19	2027	2028	2028
Inflation Rate	2%	TRC Test Order B.4 page 18	20	2028	2029	2029
Plant Specifications			21	2029	2030	2030
	Heat Rate (Btu/kWh)		22	2030	2031	2031
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23	2031	2032	2032
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24	2032	2033	2033
EDC Natural Gas Futures Source			25	2033	2034	2034
Electric Distribution Companies	EDC Abbreviation	NYMEX NG Futures Source	26	2034	2035	2035
Duquesne Light Co	DLC	Tetco M-3	27	2035	2036	2036
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28	2036	2037	2037
PECO Energy Co	PECO	Transco 6 (Non-NY)	29	2037	2038	2038
Pennsylvania Electric Co	Penelec	Tetco M-3	30	2038	2039	2039
Pennsylvania Power Co	Penn Power	Tetco M-3	31	2039	2040	2040
PPL Utilities	PPL	Transco 6 (Non-NY)	32	2040	2041	2041
West Penn Power Co	West Penn	Tetco M-3	33	2041	2042	2042
Seasonal Definitions			34	2042	2043	2043
Jan	Winter		35	2043	2044	2044
Feb	Winter		36	2044	2045	2045
Mar	Shoulder		37	2045	2046	2046
Apr	Shoulder		38	2046	2047	2047
May	Summer		39	2047	2048	2048
Jun	Summer		40	2048	2049	2049
Jul	Summer		41	2049	2050	2050
Aug	Summer		42	2050	2051	2051
Sep	Summer		43	2051	2052	2052
Oct	Shoulder		44	2052	2053	2053
Nov	Shoulder		45	2053	2054	2054
Dec	Winter		46	2054	2055	2055
			47	2055	2056	2056

Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$79.44	\$58.18	\$94.46	\$83.19	\$72.51	\$61.06	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$91.75	\$70.15	\$107.40	\$96.45	\$84.44	\$73.01	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$101.74	\$79.21	\$117.92	\$106.30	\$94.21	\$82.14	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$63.14	\$55.29	\$102.46	\$82.37	\$66.40	\$57.53	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$55.63	\$38.33	\$76.67	\$64.52	\$50.84	\$41.06	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	Segment 2
23	2032	\$55.81	\$38.50	\$78.16	\$65.59	\$51.17	\$41.34	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	
24	2033	\$57.99	\$40.04	\$81.71	\$68.08	\$53.28	\$42.84	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$60.45	\$41.79	\$85.93	\$71.04	\$55.91	\$44.70	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$62.74	\$43.41	\$89.83	\$73.77	\$58.49	\$46.52	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	Segment 3
27	2036	\$64.89	\$44.94	\$93.66	\$76.46	\$60.67	\$48.08	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$65.88	\$45.68	\$94.92	\$77.38	\$61.71	\$48.84	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	
29	2038	\$65.29	\$45.33	\$93.25	\$76.28	\$61.04	\$48.43	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$64.89	\$45.10	\$92.04	\$75.50	\$60.57	\$48.17	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$65.31	\$45.45	\$92.80	\$76.08	\$61.02	\$48.53	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$66.60	\$46.39	\$95.67	\$78.11	\$62.43	\$49.55	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$68.02	\$47.42	\$98.85	\$80.36	\$63.98	\$50.68	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$69.48	\$48.48	\$102.13	\$82.67	\$65.59	\$51.84	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$70.47	\$49.23	\$104.28	\$84.21	\$66.68	\$52.65	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$71.24	\$49.82	\$105.86	\$85.37	\$67.51	\$53.29	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$31.50	\$22.51	\$9.19	\$18.85	\$23.29	\$22.90	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

LI Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$137.58	\$116.32	\$152.60	\$141.33	\$130.65	\$119.20	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$151.05	\$129.45	\$166.70	\$155.75	\$143.74	\$132.31	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$162.23	\$139.70	\$178.41	\$166.79	\$154.70	\$142.63	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$124.83	\$116.99	\$164.16	\$144.07	\$128.10	\$119.23	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$118.57	\$101.26	\$139.60	\$127.45	\$113.77	\$104.00	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	Segment 2
23	2032	\$120.01	\$102.69	\$142.35	\$129.78	\$115.36	\$105.53	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	
24	2033	\$123.46	\$105.52	\$147.18	\$133.56	\$118.76	\$108.32	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$127.23	\$108.57	\$152.72	\$137.82	\$122.70	\$111.49	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$130.86	\$111.53	\$157.95	\$141.89	\$126.61	\$114.64	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	Segment 3
27	2036	\$134.37	\$114.43	\$163.14	\$145.94	\$130.15	\$117.56	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$136.75	\$116.55	\$165.79	\$148.25	\$132.58	\$119.71	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	
29	2038	\$137.58	\$117.62	\$165.54	\$148.57	\$133.33	\$120.72	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$138.63	\$118.84	\$165.77	\$149.23	\$134.31	\$121.90	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$140.52	\$120.66	\$168.01	\$151.29	\$136.23	\$123.74	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$143.31	\$123.10	\$172.38	\$154.82	\$139.14	\$126.27	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$146.27	\$125.67	\$177.10	\$158.61	\$142.23	\$128.93	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$149.29	\$128.30	\$181.94	\$162.49	\$145.40	\$131.66	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$151.88	\$130.64	\$185.69	\$165.62	\$148.09	\$134.06	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$154.28	\$132.86	\$188.90	\$168.40	\$150.55	\$136.32	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$116.20	\$107.21	\$93.89	\$103.55	\$107.99	\$107.59	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

Elec Futures

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal \$/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal \$/MWh)	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)
1	Jan-26	\$82.25	\$66.70	\$73.22	\$59.38
2	Feb-26	\$72.35	\$62.30	\$64.41	\$55.46
3	Mar-26	\$53.00	\$47.25	\$47.18	\$42.07
4	Apr-26	\$50.75	\$38.50	\$45.18	\$34.28
5	May-26	\$55.90	\$38.15	\$49.77	\$33.96
6	Jun-26	\$57.35	\$36.90	\$51.06	\$32.85
7	Jul-26	\$78.35	\$44.20	\$69.75	\$39.35
8	Aug-26	\$69.50	\$41.30	\$61.87	\$36.77
9	Sep-26	\$58.65	\$36.40	\$52.21	\$32.41
10	Oct-26	\$53.00	\$38.30	\$47.18	\$34.10
11	Nov-26	\$56.80	\$44.95	\$50.57	\$40.02
12	Dec-26	\$69.90	\$58.90	\$62.23	\$52.44
13	Jan-27	\$92.85	\$76.50	\$82.66	\$68.11
14	Feb-27	\$81.80	\$69.85	\$72.82	\$62.19
15	Mar-27	\$61.70	\$50.75	\$54.93	\$45.18
16	Apr-27	\$55.50	\$40.70	\$49.41	\$36.23
17	May-27	\$56.80	\$39.85	\$50.57	\$35.48
18	Jun-27	\$58.35	\$38.60	\$51.95	\$34.36
19	Jul-27	\$79.80	\$45.90	\$71.04	\$40.86
20	Aug-27	\$70.60	\$42.55	\$62.85	\$37.88
21	Sep-27	\$59.65	\$38.90	\$53.10	\$34.63
22	Oct-27	\$53.95	\$39.85	\$48.03	\$35.48
23	Nov-27	\$57.90	\$46.30	\$51.55	\$41.22
24	Dec-27	\$71.10	\$61.40	\$63.30	\$54.66
25	Jan-28	\$97.00	\$80.75	\$86.36	\$71.89
26	Feb-28	\$85.35	\$73.80	\$75.98	\$65.70
27	Mar-28	\$64.35	\$53.85	\$57.29	\$47.94
28	Apr-28	\$57.90	\$43.40	\$51.55	\$38.64
29	May-28	\$59.35	\$42.20	\$52.84	\$37.57
30	Jun-28	\$60.95	\$41.00	\$54.26	\$36.50
31	Jul-28	\$83.35	\$48.70	\$74.20	\$43.36
32	Aug-28	\$73.80	\$45.15	\$65.70	\$40.20
33	Sep-28	\$62.30	\$41.40	\$55.46	\$36.86
34	Oct-28	\$56.35	\$42.20	\$50.17	\$37.57
35	Nov-28	\$60.35	\$48.15	\$53.73	\$42.87
36	Dec-28	\$74.25	\$65.15	\$66.10	\$58.00
37	Jan-29	\$100.35	\$83.20	\$89.34	\$74.07
38	Feb-29	\$88.35	\$76.00	\$78.66	\$67.66
39	Mar-29	\$66.60	\$55.45	\$59.29	\$49.37
40	Apr-29	\$60.05	\$44.65	\$53.46	\$39.75
41	May-29	\$61.40	\$43.55	\$54.66	\$38.77
42	Jun-29	\$63.10	\$42.25	\$56.18	\$37.61
43	Jul-29	\$86.30	\$50.15	\$76.83	\$44.65
44	Aug-29	\$76.30	\$46.50	\$67.93	\$41.40
45	Sep-29	\$64.50	\$42.65	\$57.42	\$37.97
46	Oct-29	\$58.25	\$43.55	\$51.86	\$38.77
47	Nov-29	\$62.55	\$49.60	\$55.69	\$44.16
48	Dec-29	\$76.80	\$67.15	\$68.37	\$59.78
49	Jan-30	\$87.20	\$60.05	\$77.63	\$53.46
50	Feb-30	\$74.70	\$51.44	\$66.50	\$45.80
51	Mar-30	\$38.06	\$26.21	\$33.88	\$23.33
52	Apr-30	\$29.59	\$20.38	\$26.35	\$18.14
53	May-30	\$26.86	\$18.50	\$23.91	\$16.47
54	Jun-30	\$28.40	\$19.56	\$25.28	\$17.41
55	Jul-30	\$30.15	\$20.76	\$26.84	\$18.48
56	Aug-30	\$29.72	\$20.47	\$26.46	\$18.22
57	Sep-30	\$26.46	\$18.22	\$23.55	\$16.22
58	Oct-30	\$25.18	\$17.34	\$22.42	\$15.44
59	Nov-30	\$35.10	\$24.17	\$31.24	\$21.52
60	Dec-30	\$55.56	\$38.26	\$49.46	\$34.06
End of Segment I					

Real-Time, Load-Weighted LMPs (\$/MWh)

EDC	2020	2021	2022	2023	2024	Basis Factor
Western Hub	\$ 20.92	\$ 38.88	\$ 77.53	\$ 31.78	\$ 30.84	
PECO	\$ 19.29	\$ 33.55	\$ 71.67	\$ 23.63	\$ 29.87	89%

Source: PJM State of the Market Report, Tables in chapter 11

NG Futures

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 20XX Dollars)
[\$/MMBTU]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Real	\$2.72	\$2.78	\$2.64	\$2.58	\$2.64	\$2.77	\$2.87	\$3.22	\$3.48	\$3.60	\$3.63	\$3.61	\$3.52	\$3.38	\$3.26	\$3.22	\$3.25	\$3.30	\$3.34	\$3.35	\$3.33
Nominal	\$2.78	\$2.89	\$2.80	\$2.79	\$2.92	\$3.12	\$3.29	\$3.78	\$4.16	\$4.39	\$4.52	\$4.58	\$4.55	\$4.46	\$4.38	\$4.41	\$4.55	\$4.71	\$4.87	\$4.97	\$5.05

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
1	Jan-26	Jan	2026	\$4.28	\$7.61	\$6.03	\$7.61
2	Feb-26	Feb	2026	\$4.05	\$6.55	\$5.16	\$6.55
3	Mar-26	Mar	2026	\$3.69	\$3.56	\$2.69	\$3.56
4	Apr-26	Apr	2026	\$3.60	\$3.19	\$2.15	\$3.19
5	May-26	May	2026	\$3.62	\$3.00	\$1.97	\$3.00
6	Jun-26	Jun	2026	\$3.78	\$3.16	\$2.07	\$3.16
7	Jul-26	Jul	2026	\$3.97	\$3.36	\$2.20	\$3.36
8	Aug-26	Aug	2026	\$4.03	\$3.31	\$2.17	\$3.31
9	Sep-26	Sep	2026	\$3.99	\$3.01	\$1.96	\$3.01
10	Oct-26	Oct	2026	\$4.04	\$2.88	\$1.87	\$2.88
11	Nov-26	Nov	2026	\$4.25	\$3.76	\$2.53	\$3.76
12	Dec-26	Dec	2026	\$4.67	\$5.59	\$3.91	\$5.59
13	Jan-27	Jan	2027	\$4.90	\$8.24	\$5.83	\$8.24
14	Feb-27	Feb	2027	\$4.58	\$7.09	\$5.00	\$7.09
15	Mar-27	Mar	2027	\$3.92	\$3.79	\$2.60	\$3.79
16	Apr-27	Apr	2027	\$3.51	\$3.10	\$2.08	\$3.10
17	May-27	May	2027	\$3.49	\$2.87	\$1.90	\$2.87
18	Jun-27	Jun	2027	\$3.61	\$2.99	\$2.01	\$2.99
19	Jul-27	Jul	2027	\$3.77	\$3.15	\$2.13	\$3.15
20	Aug-27	Aug	2027	\$3.83	\$3.12	\$2.10	\$3.12
21	Sep-27	Sep	2027	\$3.80	\$2.82	\$1.89	\$2.82
22	Oct-27	Oct	2027	\$3.86	\$2.71	\$1.81	\$2.71
23	Nov-27	Nov	2027	\$4.06	\$3.58	\$2.44	\$3.58
24	Dec-27	Dec	2027	\$4.48	\$5.40	\$3.78	\$5.40
25	Jan-28	Jan	2028	\$4.76	\$8.09	\$5.81	\$8.09
26	Feb-28	Feb	2028	\$4.38	\$6.89	\$4.98	\$6.89
27	Mar-28	Mar	2028	\$3.75	\$3.62	\$2.59	\$3.62
28	Apr-28	Apr	2028	\$3.32	\$2.91	\$2.07	\$2.91
29	May-28	May	2028	\$3.30	\$2.68	\$1.90	\$2.68
30	Jun-28	Jun	2028	\$3.43	\$2.81	\$2.00	\$2.81
31	Jul-28	Jul	2028	\$3.60	\$2.98	\$2.12	\$2.98
32	Aug-28	Aug	2028	\$3.66	\$2.94	\$2.10	\$2.94
33	Sep-28	Sep	2028	\$3.63	\$2.66	\$1.89	\$2.66
34	Oct-28	Oct	2028	\$3.69	\$2.54	\$1.81	\$2.54
35	Nov-28	Nov	2028	\$3.88	\$3.40	\$2.44	\$3.40
36	Dec-28	Dec	2028	\$4.31	\$5.23	\$3.77	\$5.23
37	Jan-29	Jan	2029	\$4.58	\$7.91	\$6.08	\$7.91
38	Feb-29	Feb	2029	\$4.29	\$6.80	\$5.21	\$6.80
39	Mar-29	Mar	2029	\$3.59	\$3.46	\$2.71	\$3.46
40	Apr-29	Apr	2029	\$3.16	\$2.75	\$2.17	\$2.75
41	May-29	May	2029	\$3.14	\$2.52	\$1.99	\$2.52
42	Jun-29	Jun	2029	\$3.30	\$2.68	\$2.09	\$2.68
43	Jul-29	Jul	2029	\$3.49	\$2.87	\$2.22	\$2.87
44	Aug-29	Aug	2029	\$3.56	\$2.84	\$2.19	\$2.84
45	Sep-29	Sep	2029	\$3.54	\$2.56	\$1.98	\$2.56
46	Oct-29	Oct	2029	\$3.61	\$2.45	\$1.89	\$2.45
47	Nov-29	Nov	2029	\$3.80	\$3.32	\$2.55	\$3.32
48	Dec-29	Dec	2029	\$4.24	\$5.17	\$3.94	\$5.17
49	Jan-30	Jan	2030	\$4.51	\$7.91	\$6.51	\$7.91
50	Feb-30	Feb	2030	\$4.22	\$6.77	\$5.58	\$6.77

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
51	Mar-30	Mar	2030	\$3.58	\$3.45	\$2.90	\$3.45
52	Apr-30	Apr	2030	\$3.10	\$2.68	\$2.32	\$2.68
53	May-30	May	2030	\$3.07	\$2.43	\$2.13	\$2.43
54	Jun-30	Jun	2030	\$3.21	\$2.57	\$2.24	\$2.57
55	Jul-30	Jul	2030	\$3.36	\$2.73	\$2.38	\$2.73
56	Aug-30	Aug	2030	\$3.42	\$2.69	\$2.35	\$2.69
57	Sep-30	Sep	2030	\$3.40	\$2.40	\$2.11	\$2.40
58	Oct-30	Oct	2030	\$3.46	\$2.28	\$2.02	\$2.28
59	Nov-30	Nov	2030	\$3.67	\$3.18	\$2.73	\$3.18
60	Dec-30	Dec	2030	\$4.09	\$5.04	\$4.22	\$5.04
61	Jan-31	Jan	2031	\$4.32	\$7.78	\$6.86	\$7.65
62	Feb-31	Feb	2031	\$4.04	\$6.65	\$5.88	\$6.54
63	Mar-31	Mar	2031	\$3.42	\$3.29	\$3.06	\$3.26
64	Apr-31	Apr	2031	\$2.95	\$2.53	\$2.44	\$2.51
65	May-31	May	2031	\$2.94	\$2.29	\$2.24	\$2.28
66	Jun-31	Jun	2031	\$3.08	\$2.43	\$2.36	\$2.42
67	Jul-31	Jul	2031	\$3.24	\$2.60	\$2.51	\$2.59
68	Aug-31	Aug	2031	\$3.31	\$2.57	\$2.48	\$2.55
69	Sep-31	Sep	2031	\$3.28	\$2.26	\$2.23	\$2.26
70	Oct-31	Oct	2031	\$3.34	\$2.14	\$2.13	\$2.14
71	Nov-31	Nov	2031	\$3.54	\$3.04	\$2.88	\$3.01
72	Dec-31	Dec	2031	\$3.97	\$4.93	\$4.45	\$4.86
73	Jan-32	Jan	2032	\$4.26	\$7.79	\$7.87	\$7.82
74	Feb-32	Feb	2032	\$3.95	\$6.61	\$6.74	\$6.65
75	Mar-32	Mar	2032	\$3.29	\$3.16	\$3.51	\$3.26
76	Apr-32	Apr	2032	\$2.83	\$2.40	\$2.80	\$2.52
77	May-32	May	2032	\$2.82	\$2.16	\$2.57	\$2.28
78	Jun-32	Jun	2032	\$2.97	\$2.31	\$2.71	\$2.42
79	Jul-32	Jul	2032	\$3.14	\$2.49	\$2.87	\$2.60
80	Aug-32	Aug	2032	\$3.21	\$2.45	\$2.84	\$2.56
81	Sep-32	Sep	2032	\$3.18	\$2.14	\$2.56	\$2.26
82	Oct-32	Oct	2032	\$3.26	\$2.03	\$2.44	\$2.15
83	Nov-32	Nov	2032	\$3.49	\$2.98	\$3.30	\$3.07
84	Dec-32	Dec	2032	\$3.92	\$4.90	\$5.10	\$4.96
85	Jan-33	Jan	2033	\$4.17	\$7.77	\$8.68	\$8.16
86	Feb-33	Feb	2033	\$3.90	\$6.61	\$7.43	\$6.97
87	Mar-33	Mar	2033	\$3.28	\$3.14	\$3.87	\$3.45
88	Apr-33	Apr	2033	\$2.83	\$2.39	\$3.09	\$2.69
89	May-33	May	2033	\$2.86	\$2.19	\$2.83	\$2.47
90	Jun-33	Jun	2033	\$3.00	\$2.33	\$2.98	\$2.61
91	Jul-33	Jul	2033	\$3.17	\$2.50	\$3.17	\$2.79
92	Aug-33	Aug	2033	\$3.22	\$2.45	\$3.13	\$2.74
93	Sep-33	Sep	2033	\$3.20	\$2.14	\$2.82	\$2.43
94	Oct-33	Oct	2033	\$3.24	\$2.00	\$2.69	\$2.29
95	Nov-33	Nov	2033	\$3.50	\$2.98	\$3.64	\$3.26
96	Dec-33	Dec	2033	\$3.90	\$4.91	\$5.63	\$5.22
97	Jan-34	Jan	2034	\$4.16	\$7.84	\$9.14	\$8.58
98	Feb-34	Feb	2034	\$3.92	\$6.69	\$7.83	\$7.34
99	Mar-34	Mar	2034	\$3.32	\$3.18	\$4.07	\$3.69
100	Apr-34	Apr	2034	\$2.92	\$2.47	\$3.26	\$2.92

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
101	May-34	May	2034	\$2.95	\$2.26	\$2.99	\$2.68
102	Jun-34	Jun	2034	\$3.08	\$2.39	\$3.14	\$2.82
103	Jul-34	Jul	2034	\$3.22	\$2.55	\$3.34	\$3.00
104	Aug-34	Aug	2034	\$3.26	\$2.47	\$3.30	\$2.94
105	Sep-34	Sep	2034	\$3.28	\$2.20	\$2.97	\$2.64
106	Oct-34	Oct	2034	\$3.33	\$2.05	\$2.84	\$2.50
107	Nov-34	Nov	2034	\$3.57	\$3.03	\$3.83	\$3.49
108	Dec-34	Dec	2034	\$3.97	\$4.99	\$5.93	\$5.53
109	Jan-35	Jan	2035	\$4.19	\$7.94	\$9.41	\$8.99
110	Feb-35	Feb	2035	\$3.95	\$6.77	\$8.06	\$7.69
111	Mar-35	Mar	2035	\$3.52	\$3.37	\$4.19	\$3.96
112	Apr-35	Apr	2035	\$3.19	\$2.73	\$3.35	\$3.17
113	May-35	May	2035	\$3.16	\$2.47	\$3.07	\$2.90
114	Jun-35	Jun	2035	\$3.20	\$2.50	\$3.24	\$3.03
115	Jul-35	Jul	2035	\$3.24	\$2.55	\$3.44	\$3.18
116	Aug-35	Aug	2035	\$3.28	\$2.47	\$3.39	\$3.13
117	Sep-35	Sep	2035	\$3.29	\$2.19	\$3.06	\$2.81
118	Oct-35	Oct	2035	\$3.34	\$2.04	\$2.92	\$2.67
119	Nov-35	Nov	2035	\$3.54	\$3.00	\$3.94	\$3.67
120	Dec-35	Dec	2035	\$3.94	\$4.99	\$6.10	\$5.78
121	Jan-36	Jan	2036	\$4.53	\$8.36	\$9.54	\$9.38
122	Feb-36	Feb	2036	\$4.24	\$7.12	\$8.18	\$8.03
123	Mar-36	Mar	2036	\$3.63	\$3.48	\$4.25	\$4.14
124	Apr-36	Apr	2036	\$3.21	\$2.74	\$3.40	\$3.31
125	May-36	May	2036	\$3.21	\$2.50	\$3.12	\$3.03
126	Jun-36	Jun	2036	\$3.35	\$2.64	\$3.28	\$3.19
127	Jul-36	Jul	2036	\$3.50	\$2.79	\$3.49	\$3.39
128	Aug-36	Aug	2036	\$3.56	\$2.74	\$3.44	\$3.34
129	Sep-36	Sep	2036	\$3.54	\$2.42	\$3.10	\$3.00
130	Oct-36	Oct	2036	\$3.60	\$2.27	\$2.96	\$2.87
131	Nov-36	Nov	2036	\$3.82	\$3.27	\$4.00	\$3.90
132	Dec-36	Dec	2036	\$4.25	\$5.32	\$6.19	\$6.06
133	Jan-37	Jan	2037	\$4.44	\$8.35	\$9.49	\$9.49
134	Feb-37	Feb	2037	\$4.15	\$7.09	\$8.13	\$8.13
135	Mar-37	Mar	2037	\$3.55	\$3.40	\$4.23	\$4.23
136	Apr-37	Apr	2037	\$3.15	\$2.68	\$3.38	\$3.38
137	May-37	May	2037	\$3.14	\$2.41	\$3.10	\$3.10
138	Jun-37	Jun	2037	\$3.28	\$2.55	\$3.26	\$3.26
139	Jul-37	Jul	2037	\$3.43	\$2.71	\$3.46	\$3.46
140	Aug-37	Aug	2037	\$3.49	\$2.65	\$3.42	\$3.42
141	Sep-37	Sep	2037	\$3.47	\$2.33	\$3.08	\$3.08
142	Oct-37	Oct	2037	\$3.53	\$2.18	\$2.95	\$2.95
143	Nov-37	Nov	2037	\$3.74	\$3.18	\$3.98	\$3.98
144	Dec-37	Dec	2037	\$4.17	\$5.26	\$6.15	\$6.15
145	Jan-38	Jan	2038			\$9.29	\$9.29
146	Feb-38	Feb	2038			\$7.96	\$7.96
147	Mar-38	Mar	2038			\$4.14	\$4.14
148	Apr-38	Apr	2038			\$3.31	\$3.31
149	May-38	May	2038			\$3.03	\$3.03
150	Jun-38	Jun	2038			\$3.19	\$3.19

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
151	Jul-38	Jul	2038			\$3.39	\$3.39
152	Aug-38	Aug	2038			\$3.35	\$3.35
153	Sep-38	Sep	2038			\$3.02	\$3.02
154	Oct-38	Oct	2038			\$2.88	\$2.88
155	Nov-38	Nov	2038			\$3.89	\$3.89
156	Dec-38	Dec	2038			\$6.02	\$6.02
157	Jan-39	Jan	2039			\$9.14	\$9.14
158	Feb-39	Feb	2039			\$7.83	\$7.83
159	Mar-39	Mar	2039			\$4.07	\$4.07
160	Apr-39	Apr	2039			\$3.25	\$3.25
161	May-39	May	2039			\$2.98	\$2.98
162	Jun-39	Jun	2039			\$3.14	\$3.14
163	Jul-39	Jul	2039			\$3.34	\$3.34
164	Aug-39	Aug	2039			\$3.30	\$3.30
165	Sep-39	Sep	2039			\$2.97	\$2.97
166	Oct-39	Oct	2039			\$2.84	\$2.84
167	Nov-39	Nov	2039			\$3.83	\$3.83
168	Dec-39	Dec	2039			\$5.92	\$5.92
169	Jan-40	Jan	2040			\$9.20	\$9.20
170	Feb-40	Feb	2040			\$7.88	\$7.88
171	Mar-40	Mar	2040			\$4.10	\$4.10
172	Apr-40	Apr	2040			\$3.28	\$3.28
173	May-40	May	2040			\$3.00	\$3.00
174	Jun-40	Jun	2040			\$3.16	\$3.16
175	Jul-40	Jul	2040			\$3.36	\$3.36
176	Aug-40	Aug	2040			\$3.32	\$3.32
177	Sep-40	Sep	2040			\$2.99	\$2.99
178	Oct-40	Oct	2040			\$2.86	\$2.86
179	Nov-40	Nov	2040			\$3.86	\$3.86
180	Dec-40	Dec	2040			\$5.96	\$5.96
181	Jan-41	Jan	2041			\$9.49	\$9.49
182	Feb-41	Feb	2041			\$8.13	\$8.13
183	Mar-41	Mar	2041			\$4.23	\$4.23
184	Apr-41	Apr	2041			\$3.38	\$3.38
185	May-41	May	2041			\$3.10	\$3.10
186	Jun-41	Jun	2041			\$3.26	\$3.26
187	Jul-41	Jul	2041			\$3.47	\$3.47
188	Aug-41	Aug	2041			\$3.42	\$3.42
189	Sep-41	Sep	2041			\$3.08	\$3.08
190	Oct-41	Oct	2041			\$2.95	\$2.95
191	Nov-41	Nov	2041			\$3.98	\$3.98
192	Dec-41	Dec	2041			\$6.15	\$6.15
193	Jan-42	Jan	2042			\$9.82	\$9.82
194	Feb-42	Feb	2042			\$8.41	\$8.41
195	Mar-42	Mar	2042			\$4.37	\$4.37
196	Apr-42	Apr	2042			\$3.50	\$3.50
197	May-42	May	2042			\$3.21	\$3.21
198	Jun-42	Jun	2042			\$3.38	\$3.38
199	Jul-42	Jul	2042			\$3.59	\$3.59
200	Aug-42	Aug	2042			\$3.54	\$3.54

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
201	Sep-42	Sep	2042			\$3.19	\$3.19
202	Oct-42	Oct	2042			\$3.05	\$3.05
203	Nov-42	Nov	2042			\$4.11	\$4.11
204	Dec-42	Dec	2042			\$6.37	\$6.37
205	Jan-43	Jan	2043			\$10.15	\$10.15
206	Feb-43	Feb	2043			\$8.70	\$8.70
207	Mar-43	Mar	2043			\$4.52	\$4.52
208	Apr-43	Apr	2043			\$3.62	\$3.62
209	May-43	May	2043			\$3.32	\$3.32
210	Jun-43	Jun	2043			\$3.49	\$3.49
211	Jul-43	Jul	2043			\$3.71	\$3.71
212	Aug-43	Aug	2043			\$3.66	\$3.66
213	Sep-43	Sep	2043			\$3.30	\$3.30
214	Oct-43	Oct	2043			\$3.15	\$3.15
215	Nov-43	Nov	2043			\$4.26	\$4.26
216	Dec-43	Dec	2043			\$6.58	\$6.58
217	Jan-44	Jan	2044			\$10.37	\$10.37
218	Feb-44	Feb	2044			\$8.88	\$8.88
219	Mar-44	Mar	2044			\$4.62	\$4.62
220	Apr-44	Apr	2044			\$3.69	\$3.69
221	May-44	May	2044			\$3.39	\$3.39
222	Jun-44	Jun	2044			\$3.56	\$3.56
223	Jul-44	Jul	2044			\$3.79	\$3.79
224	Aug-44	Aug	2044			\$3.74	\$3.74
225	Sep-44	Sep	2044			\$3.37	\$3.37
226	Oct-44	Oct	2044			\$3.22	\$3.22
227	Nov-44	Nov	2044			\$4.34	\$4.34
228	Dec-44	Dec	2044			\$6.72	\$6.72
229	Jan-45	Jan	2045			\$10.52	\$10.52
230	Feb-45	Feb	2045			\$9.01	\$9.01
231	Mar-45	Mar	2045			\$4.69	\$4.69
232	Apr-45	Apr	2045			\$3.75	\$3.75
233	May-45	May	2045			\$3.44	\$3.44
234	Jun-45	Jun	2045			\$3.62	\$3.62
235	Jul-45	Jul	2045			\$3.84	\$3.84
236	Aug-45	Aug	2045			\$3.79	\$3.79
237	Sep-45	Sep	2045			\$3.42	\$3.42
238	Oct-45	Oct	2045			\$3.27	\$3.27
239	Nov-45	Nov	2045			\$4.41	\$4.41
240	Dec-45	Dec	2045			\$6.82	\$6.82
241	Jan-46	Jan	2046			\$0.00	\$0.00
242	Feb-46	Feb	2046			\$0.00	\$0.00
243	Mar-46	Mar	2046			\$0.00	\$0.00
244	Apr-46	Apr	2046			\$0.00	\$0.00
245	May-46	May	2046			\$0.00	\$0.00
246	Jun-46	Jun	2046			\$0.00	\$0.00
247	Jul-46	Jul	2046			\$0.00	\$0.00
248	Aug-46	Aug	2046			\$0.00	\$0.00
249	Sep-46	Sep	2046			\$0.00	\$0.00
250	Oct-46	Oct	2046			\$0.00	\$0.00

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
251	Nov-46	Nov	2046			\$0.00	\$0.00
252	Dec-46	Dec	2046			\$0.00	\$0.00
253	Jan-47	Jan	2047			\$0.00	\$0.00
254	Feb-47	Feb	2047			\$0.00	\$0.00
255	Mar-47	Mar	2047			\$0.00	\$0.00
256	Apr-47	Apr	2047			\$0.00	\$0.00
257	May-47	May	2047			\$0.00	\$0.00
258	Jun-47	Jun	2047			\$0.00	\$0.00
259	Jul-47	Jul	2047			\$0.00	\$0.00
260	Aug-47	Aug	2047			\$0.00	\$0.00
261	Sep-47	Sep	2047			\$0.00	\$0.00
262	Oct-47	Oct	2047			\$0.00	\$0.00
263	Nov-47	Nov	2047			\$0.00	\$0.00
264	Dec-47	Dec	2047			\$0.00	\$0.00

Avoided AC

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
1	Jan-26	Jan	2026	Winter	\$73.22	\$59.38	\$83.93	\$57.80	-\$10.70	\$158	\$73.22	\$59.38
2	Feb-26	Feb	2026	Winter	\$64.41	\$55.46	\$72.27	\$49.77	-\$7.86	\$5.69	\$64.41	\$55.46
3	Mar-26	Mar	2026	Shoulder	\$47.18	\$42.07	\$39.29	\$27.06	\$7.89	\$15.01	\$47.18	\$42.07
4	Apr-26	Apr	2026	Shoulder	\$45.18	\$34.28	\$35.20	\$24.24	\$9.98	\$10.04	\$45.18	\$34.28
5	May-26	May	2026	Summer	\$49.77	\$33.96	\$33.13	\$22.81	\$16.64	\$11.15	\$49.77	\$33.96
6	Jun-26	Jun	2026	Summer	\$51.06	\$32.85	\$34.88	\$24.02	\$16.18	\$8.83	\$51.06	\$32.85
7	Jul-26	Jul	2026	Summer	\$69.75	\$39.35	\$37.01	\$25.49	\$32.74	\$13.86	\$69.75	\$39.35
8	Aug-26	Aug	2026	Summer	\$61.87	\$36.77	\$36.55	\$25.17	\$25.32	\$11.59	\$61.87	\$36.77
9	Sep-26	Sep	2026	Summer	\$52.21	\$32.41	\$33.23	\$22.89	\$18.98	\$9.52	\$52.21	\$32.41
10	Oct-26	Oct	2026	Shoulder	\$47.18	\$34.10	\$31.81	\$21.91	\$15.37	\$12.19	\$47.18	\$34.10
11	Nov-26	Nov	2026	Shoulder	\$50.57	\$40.02	\$41.52	\$28.59	\$9.05	\$11.42	\$50.57	\$40.02
12	Dec-26	Dec	2026	Winter	\$62.23	\$52.44	\$61.70	\$42.49	\$0.53	\$3.95	\$62.23	\$52.44
13	Jan-27	Jan	2027	Winter	\$82.66	\$68.11	\$90.85	\$62.57	-\$8.19	\$5.54	\$82.66	\$68.11
14	Feb-27	Feb	2027	Winter	\$72.82	\$62.19	\$78.15	\$53.82	-\$5.33	\$8.37	\$72.82	\$62.19
15	Mar-27	Mar	2027	Shoulder	\$54.93	\$45.18	\$41.78	\$28.77	\$13.15	\$16.41	\$54.93	\$45.18
16	Apr-27	Apr	2027	Shoulder	\$49.41	\$36.23	\$34.24	\$23.58	\$15.17	\$12.66	\$49.41	\$36.23
17	May-27	May	2027	Summer	\$50.57	\$35.48	\$31.62	\$21.77	\$18.95	\$13.71	\$50.57	\$35.48
18	Jun-27	Jun	2027	Summer	\$51.95	\$34.36	\$32.96	\$22.70	\$18.99	\$11.67	\$51.95	\$34.36
19	Jul-27	Jul	2027	Summer	\$71.04	\$40.86	\$34.78	\$23.95	\$36.26	\$16.91	\$71.04	\$40.86
20	Aug-27	Aug	2027	Summer	\$62.85	\$37.88	\$34.37	\$23.67	\$28.48	\$14.21	\$62.85	\$37.88
21	Sep-27	Sep	2027	Summer	\$53.10	\$34.63	\$31.09	\$21.41	\$22.01	\$13.22	\$53.10	\$34.63
22	Oct-27	Oct	2027	Shoulder	\$48.03	\$35.48	\$29.86	\$20.56	\$18.17	\$14.91	\$48.03	\$35.48
23	Nov-27	Nov	2027	Shoulder	\$51.55	\$41.22	\$39.47	\$27.18	\$12.08	\$14.04	\$51.55	\$41.22
24	Dec-27	Dec	2027	Winter	\$63.30	\$54.66	\$59.60	\$41.04	\$3.70	\$13.62	\$63.30	\$54.66
25	Jan-28	Jan	2028	Winter	\$86.36	\$71.89	\$89.29	\$61.49	-\$2.93	\$10.40	\$86.36	\$71.89
26	Feb-28	Feb	2028	Winter	\$75.98	\$65.70	\$75.96	\$52.31	\$0.03	\$13.39	\$75.98	\$65.70
27	Mar-28	Mar	2028	Shoulder	\$57.29	\$47.94	\$39.95	\$27.51	\$17.34	\$20.43	\$57.29	\$47.94
28	Apr-28	Apr	2028	Shoulder	\$51.55	\$38.64	\$32.10	\$22.10	\$19.45	\$16.53	\$51.55	\$38.64
29	May-28	May	2028	Summer	\$52.84	\$37.57	\$29.53	\$20.34	\$23.31	\$17.23	\$52.84	\$37.57
30	Jun-28	Jun	2028	Summer	\$54.26	\$36.50	\$30.98	\$21.34	\$23.28	\$15.16	\$54.26	\$36.50
31	Jul-28	Jul	2028	Summer	\$74.20	\$43.36	\$32.91	\$22.66	\$41.30	\$20.69	\$74.20	\$43.36
32	Aug-28	Aug	2028	Summer	\$65.70	\$40.20	\$32.46	\$22.36	\$33.24	\$17.84	\$65.70	\$40.20
33	Sep-28	Sep	2028	Summer	\$55.46	\$36.86	\$29.31	\$20.18	\$26.16	\$16.67	\$55.46	\$36.86
34	Oct-28	Oct	2028	Shoulder	\$50.17	\$37.57	\$27.98	\$19.27	\$22.18	\$18.30	\$50.17	\$37.57
35	Nov-28	Nov	2028	Shoulder	\$53.73	\$42.87	\$37.47	\$25.81	\$16.25	\$17.06	\$53.73	\$42.87
36	Dec-28	Dec	2028	Winter	\$66.10	\$58.00	\$57.72	\$39.75	\$8.38	\$18.25	\$66.10	\$58.00
37	Jan-29	Jan	2029	Winter	\$89.34	\$74.07	\$87.25	\$60.08	\$2.09	\$13.99	\$89.34	\$74.07
38	Feb-29	Feb	2029	Winter	\$78.66	\$67.66	\$74.96	\$51.62	\$3.69	\$16.04	\$78.66	\$67.66
39	Mar-29	Mar	2029	Shoulder	\$59.29	\$49.37	\$38.21	\$26.31	\$21.08	\$23.05	\$59.29	\$49.37
40	Apr-29	Apr	2029	Shoulder	\$53.46	\$39.75	\$30.34	\$20.90	\$23.12	\$18.85	\$53.46	\$39.75
41	May-29	May	2029	Summer	\$54.66	\$38.77	\$27.81	\$19.15	\$26.85	\$19.62	\$54.66	\$38.77
42	Jun-29	Jun	2029	Summer	\$56.18	\$37.61	\$29.58	\$20.37	\$26.59	\$17.24	\$56.18	\$37.61
43	Jul-29	Jul	2029	Summer	\$76.83	\$44.65	\$31.67	\$21.81	\$45.16	\$22.83	\$76.83	\$44.65
44	Aug-29	Aug	2029	Summer	\$67.93	\$41.40	\$31.35	\$21.59	\$36.58	\$19.81	\$67.93	\$41.40
45	Sep-29	Sep	2029	Summer	\$57.42	\$37.97	\$28.27	\$19.47	\$29.15	\$18.50	\$57.42	\$37.97
46	Oct-29	Oct	2029	Shoulder	\$51.86	\$38.77	\$27.07	\$18.64	\$24.79	\$20.13	\$51.86	\$38.77
47	Nov-29	Nov	2029	Shoulder	\$55.69	\$44.16	\$36.57	\$25.18	\$19.12	\$18.97	\$55.69	\$44.16
48	Dec-29	Dec	2029	Winter	\$68.37	\$59.78	\$57.00	\$39.25	\$11.38	\$20.53	\$68.37	\$59.78
49	Jan-30	Jan	2030	Winter	\$77.63	\$53.46	\$67.20	\$60.05	-\$9.57	-\$6.59	\$77.63	\$53.46
50	Feb-30	Feb	2030	Winter	\$66.50	\$45.80	\$74.70	\$51.44	-\$8.20	-\$5.64	\$66.50	\$45.80

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
51	Mar-30	Mar	2030	Shoulder	\$33.88	\$23.33	\$38.06	\$26.21	-\$4.18	-\$2.88	\$33.88	\$23.33
52	Apr-30	Apr	2030	Shoulder	\$26.35	\$18.14	\$29.59	\$20.38	-\$3.25	-\$2.24	\$26.35	\$18.14
53	May-30	May	2030	Summer	\$23.91	\$16.47	\$26.86	\$18.50	-\$2.95	-\$2.03	\$23.91	\$16.47
54	Jun-30	Jun	2030	Summer	\$25.28	\$17.41	\$28.40	\$19.56	-\$3.12	-\$2.15	\$25.28	\$17.41
55	Jul-30	Jul	2030	Summer	\$26.84	\$18.48	\$30.15	\$20.76	-\$3.31	-\$2.28	\$26.84	\$18.48
56	Aug-30	Aug	2030	Summer	\$26.46	\$18.22	\$29.72	\$20.47	-\$3.26	-\$2.25	\$26.46	\$18.22
57	Sep-30	Sep	2030	Summer	\$23.55	\$16.22	\$26.46	\$18.22	-\$2.90	-\$2.00	\$23.55	\$16.22
58	Oct-30	Oct	2030	Shoulder	\$22.42	\$15.44	\$25.18	\$17.34	-\$2.76	-\$1.90	\$22.42	\$15.44
59	Nov-30	Nov	2030	Shoulder	\$31.24	\$21.52	\$35.10	\$24.17	-\$3.85	-\$2.65	\$31.24	\$21.52
60	Dec-30	Dec	2030	Winter	\$49.46	\$34.06	\$55.56	\$38.26	-\$6.10	-\$4.20	\$49.46	\$34.06
61	Jan-31	Jan	2031	Winter	\$0.00	\$0.00	\$84.41	\$58.13	-\$4.55	\$5.95	\$79.86	\$64.09
62	Feb-31	Feb	2031	Winter	\$0.00	\$0.00	\$72.12	\$49.67	-\$2.40	\$8.20	\$69.72	\$57.87
63	Mar-31	Mar	2031	Shoulder	\$0.00	\$0.00	\$35.90	\$24.73	\$12.09	\$14.55	\$48.00	\$39.27
64	Apr-31	Apr	2031	Shoulder	\$0.00	\$0.00	\$27.74	\$19.10	\$13.90	\$11.69	\$41.64	\$30.79
65	May-31	May	2031	Summer	\$0.00	\$0.00	\$25.18	\$17.34	\$16.88	\$12.38	\$42.07	\$29.73
66	Jun-31	Jun	2031	Summer	\$0.00	\$0.00	\$26.73	\$18.41	\$16.78	\$10.70	\$43.51	\$29.11
67	Jul-31	Jul	2031	Summer	\$0.00	\$0.00	\$28.54	\$19.65	\$30.47	\$14.84	\$59.01	\$34.49
68	Aug-31	Aug	2031	Summer	\$0.00	\$0.00	\$28.17	\$19.40	\$24.25	\$12.66	\$52.42	\$32.06
69	Sep-31	Sep	2031	Summer	\$0.00	\$0.00	\$24.91	\$17.16	\$18.99	\$11.84	\$43.90	\$32.99
70	Oct-31	Oct	2031	Shoulder	\$0.00	\$0.00	\$23.59	\$16.25	\$15.92	\$13.13	\$39.51	\$29.37
71	Nov-31	Nov	2031	Shoulder	\$0.00	\$0.00	\$33.25	\$22.90	\$11.13	\$12.10	\$44.38	\$35.00
72	Dec-31	Dec	2031	Winter	\$0.00	\$0.00	\$53.65	\$36.95	\$4.43	\$12.30	\$58.08	\$49.24
73	Jan-32	Jan	2032	Winter	\$0.00	\$0.00	\$86.21	\$59.37	-\$4.55	\$5.95	\$81.66	\$65.32
74	Feb-32	Feb	2032	Winter	\$0.00	\$0.00	\$73.30	\$50.48	-\$2.40	\$8.20	\$70.90	\$58.68
75	Mar-32	Mar	2032	Shoulder	\$0.00	\$0.00	\$35.92	\$24.74	\$12.09	\$14.55	\$48.01	\$39.28
76	Apr-32	Apr	2032	Shoulder	\$0.00	\$0.00	\$27.75	\$19.11	\$13.90	\$11.69	\$41.66	\$30.80
77	May-32	May	2032	Summer	\$0.00	\$0.00	\$25.11	\$17.29	\$16.88	\$12.38	\$41.99	\$29.67
78	Jun-32	Jun	2032	Summer	\$0.00	\$0.00	\$26.74	\$18.42	\$16.78	\$10.70	\$43.52	\$29.12
79	Jul-32	Jul	2032	Summer	\$0.00	\$0.00	\$28.67	\$19.74	\$30.47	\$14.84	\$59.14	\$34.58
80	Aug-32	Aug	2032	Summer	\$0.00	\$0.00	\$28.23	\$19.44	\$24.25	\$12.66	\$52.48	\$32.10
81	Sep-32	Sep	2032	Summer	\$0.00	\$0.00	\$24.95	\$17.18	\$18.99	\$11.84	\$43.94	\$32.02
82	Oct-32	Oct	2032	Shoulder	\$0.00	\$0.00	\$23.71	\$16.33	\$15.92	\$13.13	\$39.62	\$29.45
83	Nov-32	Nov	2032	Shoulder	\$0.00	\$0.00	\$33.84	\$23.31	\$11.13	\$12.10	\$44.97	\$35.41
84	Dec-32	Dec	2032	Winter	\$0.00	\$0.00	\$54.70	\$37.67	\$4.43	\$12.30	\$59.12	\$49.37
85	Jan-33	Jan	2033	Winter	\$0.00	\$0.00	\$90.02	\$61.99	-\$4.55	\$5.95	\$85.47	\$67.95
86	Feb-33	Feb	2033	Winter	\$0.00	\$0.00	\$76.83	\$52.91	-\$2.40	\$8.20	\$74.43	\$61.12
87	Mar-33	Mar	2033	Shoulder	\$0.00	\$0.00	\$38.09	\$26.23	\$12.09	\$14.55	\$50.18	\$40.78
88	Apr-33	Apr	2033	Shoulder	\$0.00	\$0.00	\$29.69	\$20.44	\$13.90	\$11.69	\$43.59	\$32.13
89	May-33	May	2033	Summer	\$0.00	\$0.00	\$27.20	\$18.73	\$16.88	\$12.38	\$44.09	\$31.12
90	Jun-33	Jun	2033	Summer	\$0.00	\$0.00	\$28.79	\$19.83	\$16.78	\$10.70	\$45.57	\$30.53
91	Jul-33	Jul	2033	Summer	\$0.00	\$0.00	\$30.76	\$21.18	\$30.47	\$14.84	\$61.23	\$36.02
92	Aug-33	Aug	2033	Summer	\$0.00	\$0.00	\$30.23	\$20.82	\$24.25	\$12.66	\$54.48	\$33.48
93	Sep-33	Sep	2033	Summer	\$0.00	\$0.00	\$26.81	\$18.46	\$18.99	\$11.84	\$45.80	\$30.30
94	Oct-33	Oct	2033	Shoulder	\$0.00	\$0.00	\$25.31	\$17.43	\$15.92	\$13.13	\$41.23	\$30.56
95	Nov-33	Nov	2033	Shoulder	\$0.00	\$0.00	\$36.00	\$24.79	\$11.13	\$12.10	\$47.12	\$36.89
96	Dec-33	Dec	2033	Winter	\$0.00	\$0.00	\$57.53	\$39.62	\$4.43	\$12.30	\$61.96	\$51.92
97	Jan-34	Jan	2034	Winter	\$0.00	\$0.00	\$94.68	\$65.20	-\$4.55	\$5.95	\$90.13	\$71.16
98	Feb-34	Feb	2034	Winter	\$0.00	\$0.00	\$80.97	\$55.76	-\$2.40	\$8.20	\$78.57	\$63.97
99	Mar-34	Mar	2034	Shoulder	\$0.00	\$0.00	\$40.70	\$28.03	\$12.09	\$14.55	\$52.79	\$42.58
100	Apr-34	Apr	2034	Shoulder	\$0.00	\$0.00	\$32.20	\$22.18	\$13.90	\$11.69	\$46.11	\$33.87

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
101	May-34	May	2034	Summer	\$0.00	\$0.00	\$29.52	\$20.33	\$16.88	\$12.38	\$46.41	\$32.72
102	Jun-34	Jun	2034	Summer	\$0.00	\$0.00	\$31.12	\$21.43	\$16.78	\$10.70	\$47.90	\$32.13
103	Jul-34	Jul	2034	Summer	\$0.00	\$0.00	\$33.08	\$22.78	\$30.47	\$14.84	\$63.55	\$37.62
104	Aug-34	Aug	2034	Summer	\$0.00	\$0.00	\$32.48	\$22.37	\$24.25	\$12.66	\$56.73	\$35.03
105	Sep-34	Sep	2034	Summer	\$0.00	\$0.00	\$29.11	\$20.05	\$18.99	\$11.84	\$48.10	\$31.89
106	Oct-34	Oct	2034	Shoulder	\$0.00	\$0.00	\$27.59	\$19.00	\$15.92	\$13.13	\$43.50	\$32.12
107	Nov-34	Nov	2034	Shoulder	\$0.00	\$0.00	\$38.49	\$26.51	\$11.13	\$12.10	\$49.62	\$38.61
108	Dec-34	Dec	2034	Winter	\$0.00	\$0.00	\$60.94	\$41.97	\$4.43	\$12.30	\$65.37	\$54.27
109	Jan-35	Jan	2035	Winter	\$0.00	\$0.00	\$99.17	\$68.30	-\$4.55	\$5.95	\$46.42	\$37.25
110	Feb-35	Feb	2035	Winter	\$0.00	\$0.00	\$94.85	\$58.44	-\$2.40	\$8.20	\$82.45	\$66.64
111	Mar-35	Mar	2035	Shoulder	\$0.00	\$0.00	\$43.67	\$30.07	\$12.09	\$14.55	\$55.76	\$44.62
112	Apr-35	Apr	2035	Shoulder	\$0.00	\$0.00	\$35.01	\$24.11	\$13.90	\$11.69	\$48.91	\$35.80
113	May-35	May	2035	Summer	\$0.00	\$0.00	\$31.99	\$22.03	\$16.88	\$12.38	\$48.87	\$34.41
114	Jun-35	Jun	2035	Summer	\$0.00	\$0.00	\$33.37	\$22.98	\$16.78	\$10.70	\$50.15	\$33.68
115	Jul-35	Jul	2035	Summer	\$0.00	\$0.00	\$35.11	\$24.18	\$30.47	\$14.84	\$65.58	\$39.02
116	Aug-35	Aug	2035	Summer	\$0.00	\$0.00	\$34.54	\$23.79	\$24.25	\$12.66	\$58.79	\$36.45
117	Sep-35	Sep	2035	Summer	\$0.00	\$0.00	\$30.98	\$21.34	\$18.99	\$11.84	\$49.97	\$33.18
118	Oct-35	Oct	2035	Shoulder	\$0.00	\$0.00	\$29.45	\$20.28	\$15.92	\$13.13	\$45.37	\$33.41
119	Nov-35	Nov	2035	Shoulder	\$0.00	\$0.00	\$40.52	\$27.91	\$11.13	\$12.10	\$51.65	\$40.01
120	Dec-35	Dec	2035	Winter	\$0.00	\$0.00	\$63.78	\$43.93	\$4.43	\$12.30	\$68.21	\$56.22
121	Jan-36	Jan	2036	Winter	\$0.00	\$0.00	\$103.41	\$71.22	-\$4.55	\$5.95	\$98.86	\$77.17
122	Feb-36	Feb	2036	Winter	\$0.00	\$0.00	\$88.53	\$60.96	-\$2.40	\$8.20	\$86.13	\$69.17
123	Mar-36	Mar	2036	Shoulder	\$0.00	\$0.00	\$45.70	\$31.47	\$12.09	\$14.55	\$57.79	\$46.02
124	Apr-36	Apr	2036	Shoulder	\$0.00	\$0.00	\$36.46	\$25.11	\$13.90	\$11.69	\$50.37	\$36.80
125	May-36	May	2036	Summer	\$0.00	\$0.00	\$33.41	\$23.01	\$16.88	\$12.38	\$50.29	\$35.39
126	Jun-36	Jun	2036	Summer	\$0.00	\$0.00	\$35.18	\$24.23	\$16.78	\$10.70	\$51.96	\$34.93
127	Jul-36	Jul	2036	Summer	\$0.00	\$0.00	\$37.36	\$25.73	\$30.47	\$14.84	\$67.83	\$40.57
128	Aug-36	Aug	2036	Summer	\$0.00	\$0.00	\$36.87	\$25.39	\$24.25	\$12.66	\$61.12	\$38.05
129	Sep-36	Sep	2036	Summer	\$0.00	\$0.00	\$33.11	\$22.80	\$18.99	\$11.84	\$52.10	\$34.64
130	Oct-36	Oct	2036	Shoulder	\$0.00	\$0.00	\$31.60	\$21.76	\$15.92	\$13.13	\$47.52	\$34.89
131	Nov-36	Nov	2036	Shoulder	\$0.00	\$0.00	\$42.97	\$29.59	\$11.13	\$12.10	\$54.09	\$41.69
132	Dec-36	Dec	2036	Winter	\$0.00	\$0.00	\$66.88	\$46.06	\$4.43	\$12.30	\$71.31	\$58.36
133	Jan-37	Jan	2037	Winter	\$0.00	\$0.00	\$104.63	\$72.05	-\$4.55	\$5.95	\$100.08	\$78.01
134	Feb-37	Feb	2037	Winter	\$0.00	\$0.00	\$89.63	\$61.73	-\$2.40	\$8.20	\$87.23	\$69.93
135	Mar-37	Mar	2037	Shoulder	\$0.00	\$0.00	\$46.62	\$32.11	\$12.09	\$14.55	\$58.72	\$46.66
136	Apr-37	Apr	2037	Shoulder	\$0.00	\$0.00	\$37.26	\$25.66	\$13.90	\$11.69	\$51.16	\$37.35
137	May-37	May	2037	Summer	\$0.00	\$0.00	\$34.17	\$23.53	\$16.88	\$12.38	\$51.06	\$35.92
138	Jun-37	Jun	2037	Summer	\$0.00	\$0.00	\$35.97	\$24.77	\$16.78	\$10.70	\$52.75	\$35.47
139	Jul-37	Jul	2037	Summer	\$0.00	\$0.00	\$38.22	\$26.32	\$30.47	\$14.84	\$68.69	\$41.16
140	Aug-37	Aug	2037	Summer	\$0.00	\$0.00	\$37.74	\$25.99	\$24.25	\$12.66	\$61.99	\$38.65
141	Sep-37	Sep	2037	Summer	\$0.00	\$0.00	\$33.97	\$23.39	\$18.99	\$11.84	\$52.96	\$35.23
142	Oct-37	Oct	2037	Shoulder	\$0.00	\$0.00	\$32.49	\$22.37	\$15.92	\$13.13	\$48.40	\$35.50
143	Nov-37	Nov	2037	Shoulder	\$0.00	\$0.00	\$43.85	\$30.20	\$11.13	\$12.10	\$54.98	\$42.30
144	Dec-37	Dec	2037	Winter	\$0.00	\$0.00	\$67.83	\$46.71	\$4.43	\$12.30	\$72.26	\$59.01
145	Jan-38	Jan	2038	Winter	\$0.00	\$0.00	\$102.44	\$70.54	-\$4.55	\$5.95	\$97.88	\$76.50
146	Feb-38	Feb	2038	Winter	\$0.00	\$0.00	\$87.75	\$60.43	-\$2.40	\$8.20	\$85.35	\$68.64
147	Mar-38	Mar	2038	Shoulder	\$0.00	\$0.00	\$45.64	\$31.43	\$12.09	\$14.55	\$57.74	\$45.98
148	Apr-38	Apr	2038	Shoulder	\$0.00	\$0.00	\$36.48	\$25.12	\$13.90	\$11.69	\$50.38	\$36.81
149	May-38	May	2038	Summer	\$0.00	\$0.00	\$33.46	\$23.04	\$16.88	\$12.38	\$50.34	\$35.42
150	Jun-38	Jun	2038	Summer	\$0.00	\$0.00	\$35.22	\$24.25	\$16.78	\$10.70	\$52.00	\$34.95

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
151	Jul-38	Jul	2038	Summer	\$0.00	\$0.00	\$37.41	\$25.77	\$30.47	\$14.84	\$57.88	\$40.61
152	Aug-38	Aug	2038	Summer	\$0.00	\$0.00	\$36.95	\$25.45	\$24.25	\$12.66	\$61.20	\$38.11
153	Sep-38	Sep	2038	Summer	\$0.00	\$0.00	\$33.26	\$22.90	\$18.99	\$11.84	\$52.25	\$34.74
154	Oct-38	Oct	2038	Shoulder	\$0.00	\$0.00	\$31.81	\$21.90	\$15.92	\$13.13	\$47.72	\$35.03
155	Nov-38	Nov	2038	Shoulder	\$0.00	\$0.00	\$42.93	\$29.57	\$11.13	\$12.10	\$54.06	\$41.67
156	Dec-38	Dec	2038	Winter	\$0.00	\$0.00	\$66.41	\$45.73	\$4.43	\$12.30	\$70.84	\$58.03
157	Jan-39	Jan	2039	Winter	\$0.00	\$0.00	\$100.77	\$69.40	-\$4.55	\$5.95	\$96.22	\$75.35
158	Feb-39	Feb	2039	Winter	\$0.00	\$0.00	\$96.33	\$59.45	-\$2.40	\$8.20	\$93.93	\$67.66
159	Mar-39	Mar	2039	Shoulder	\$0.00	\$0.00	\$44.90	\$30.92	\$12.09	\$14.55	\$57.00	\$45.47
160	Apr-39	Apr	2039	Shoulder	\$0.00	\$0.00	\$35.89	\$24.71	\$13.90	\$11.69	\$49.79	\$36.40
161	May-39	May	2039	Summer	\$0.00	\$0.00	\$32.91	\$22.67	\$16.88	\$12.38	\$49.80	\$35.05
162	Jun-39	Jun	2039	Summer	\$0.00	\$0.00	\$34.65	\$23.86	\$16.78	\$10.70	\$51.43	\$34.56
163	Jul-39	Jul	2039	Summer	\$0.00	\$0.00	\$36.81	\$25.35	\$30.47	\$14.84	\$67.28	\$40.19
164	Aug-39	Aug	2039	Summer	\$0.00	\$0.00	\$36.35	\$25.03	\$24.25	\$12.66	\$60.60	\$37.69
165	Sep-39	Sep	2039	Summer	\$0.00	\$0.00	\$32.72	\$22.53	\$18.99	\$11.84	\$51.71	\$34.37
166	Oct-39	Oct	2039	Shoulder	\$0.00	\$0.00	\$31.29	\$21.55	\$15.92	\$13.13	\$47.21	\$34.67
167	Nov-39	Nov	2039	Shoulder	\$0.00	\$0.00	\$42.23	\$29.09	\$11.13	\$12.10	\$53.36	\$41.19
168	Dec-39	Dec	2039	Winter	\$0.00	\$0.00	\$65.33	\$44.99	\$4.43	\$12.30	\$69.76	\$57.29
169	Jan-40	Jan	2040	Winter	\$0.00	\$0.00	\$101.48	\$69.89	-\$4.55	\$5.95	\$96.93	\$75.94
170	Feb-40	Feb	2040	Winter	\$0.00	\$0.00	\$96.94	\$59.87	-\$2.40	\$8.20	\$94.54	\$68.08
171	Mar-40	Mar	2040	Shoulder	\$0.00	\$0.00	\$45.22	\$31.14	\$12.09	\$14.55	\$57.31	\$45.69
172	Apr-40	Apr	2040	Shoulder	\$0.00	\$0.00	\$36.14	\$24.89	\$13.90	\$11.69	\$50.04	\$36.58
173	May-40	May	2040	Summer	\$0.00	\$0.00	\$33.14	\$22.83	\$16.88	\$12.38	\$50.03	\$35.21
174	Jun-40	Jun	2040	Summer	\$0.00	\$0.00	\$34.89	\$24.03	\$16.78	\$10.70	\$51.67	\$34.73
175	Jul-40	Jul	2040	Summer	\$0.00	\$0.00	\$37.07	\$25.53	\$30.47	\$14.84	\$67.54	\$40.37
176	Aug-40	Aug	2040	Summer	\$0.00	\$0.00	\$36.60	\$25.21	\$24.25	\$12.66	\$60.86	\$37.87
177	Sep-40	Sep	2040	Summer	\$0.00	\$0.00	\$32.95	\$22.69	\$18.99	\$11.84	\$51.94	\$34.83
178	Oct-40	Oct	2040	Shoulder	\$0.00	\$0.00	\$31.51	\$21.70	\$15.92	\$13.13	\$47.43	\$34.53
179	Nov-40	Nov	2040	Shoulder	\$0.00	\$0.00	\$42.53	\$29.29	\$11.13	\$12.10	\$53.66	\$41.39
180	Dec-40	Dec	2040	Winter	\$0.00	\$0.00	\$65.79	\$45.31	\$4.43	\$12.30	\$70.22	\$57.61
181	Jan-41	Jan	2041	Winter	\$0.00	\$0.00	\$104.70	\$72.10	-\$4.55	\$5.95	\$100.15	\$78.06
182	Feb-41	Feb	2041	Winter	\$0.00	\$0.00	\$99.69	\$61.77	-\$2.40	\$8.20	\$97.29	\$69.97
183	Mar-41	Mar	2041	Shoulder	\$0.00	\$0.00	\$46.65	\$32.13	\$12.09	\$14.55	\$58.75	\$46.68
184	Apr-41	Apr	2041	Shoulder	\$0.00	\$0.00	\$37.28	\$25.68	\$13.90	\$11.69	\$51.19	\$37.37
185	May-41	May	2041	Summer	\$0.00	\$0.00	\$34.20	\$23.95	\$16.88	\$12.38	\$51.08	\$35.93
186	Jun-41	Jun	2041	Summer	\$0.00	\$0.00	\$36.00	\$24.79	\$16.78	\$10.70	\$52.78	\$35.49
187	Jul-41	Jul	2041	Summer	\$0.00	\$0.00	\$38.24	\$26.34	\$30.47	\$14.84	\$68.71	\$41.18
188	Aug-41	Aug	2041	Summer	\$0.00	\$0.00	\$37.77	\$26.01	\$24.25	\$12.66	\$62.02	\$38.67
189	Sep-41	Sep	2041	Summer	\$0.00	\$0.00	\$33.99	\$23.41	\$18.99	\$11.84	\$52.98	\$35.25
190	Oct-41	Oct	2041	Shoulder	\$0.00	\$0.00	\$32.51	\$22.39	\$15.92	\$13.13	\$48.43	\$35.51
191	Nov-41	Nov	2041	Shoulder	\$0.00	\$0.00	\$43.88	\$30.22	\$11.13	\$12.10	\$55.00	\$42.32
192	Dec-41	Dec	2041	Winter	\$0.00	\$0.00	\$67.88	\$46.74	\$4.43	\$12.30	\$72.31	\$59.04
193	Jan-42	Jan	2042	Winter	\$0.00	\$0.00	\$108.29	\$74.58	-\$4.55	\$5.95	\$103.74	\$80.53
194	Feb-42	Feb	2042	Winter	\$0.00	\$0.00	\$92.77	\$63.89	-\$2.40	\$8.20	\$90.37	\$72.09
195	Mar-42	Mar	2042	Shoulder	\$0.00	\$0.00	\$48.26	\$33.23	\$12.09	\$14.55	\$60.35	\$47.78
196	Apr-42	Apr	2042	Shoulder	\$0.00	\$0.00	\$38.56	\$26.56	\$13.90	\$11.69	\$52.47	\$38.25
197	May-42	May	2042	Summer	\$0.00	\$0.00	\$35.37	\$24.36	\$16.88	\$12.38	\$52.25	\$36.74
198	Jun-42	Jun	2042	Summer	\$0.00	\$0.00	\$37.23	\$25.64	\$16.78	\$10.70	\$54.01	\$36.34
199	Jul-42	Jul	2042	Summer	\$0.00	\$0.00	\$39.56	\$27.24	\$30.47	\$14.84	\$70.02	\$42.08
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$39.06	\$26.90	\$24.25	\$12.66	\$63.32	\$39.56

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$39.06	\$26.30	\$24.25	\$12.66	\$63.32	\$39.56
201	Sep-42	Sep	2042	Summer	\$0.00	\$0.00	\$35.16	\$24.21	\$18.39	\$11.84	\$54.15	\$36.05
202	Oct-42	Oct	2042	Shoulder	\$0.00	\$0.00	\$33.62	\$23.16	\$15.32	\$13.13	\$49.54	\$36.28
203	Nov-42	Nov	2042	Shoulder	\$0.00	\$0.00	\$45.39	\$31.26	\$11.13	\$12.10	\$56.51	\$43.36
204	Dec-42	Dec	2042	Winter	\$0.00	\$0.00	\$70.21	\$48.35	\$4.43	\$12.30	\$74.64	\$60.65
205	Jan-43	Jan	2043	Winter	\$0.00	\$0.00	\$112.00	\$77.13	-\$4.55	\$5.35	\$107.44	\$83.08
206	Feb-43	Feb	2043	Winter	\$0.00	\$0.00	\$35.35	\$66.07	-\$2.40	\$8.20	\$33.55	\$74.28
207	Mar-43	Mar	2043	Shoulder	\$0.00	\$0.00	\$49.31	\$34.37	\$12.09	\$14.55	\$62.00	\$48.32
208	Apr-43	Apr	2043	Shoulder	\$0.00	\$0.00	\$39.88	\$27.47	\$13.30	\$11.69	\$53.79	\$39.16
209	May-43	May	2043	Summer	\$0.00	\$0.00	\$36.58	\$25.19	\$16.88	\$12.38	\$53.46	\$37.57
210	Jun-43	Jun	2043	Summer	\$0.00	\$0.00	\$38.51	\$26.52	\$16.78	\$10.70	\$55.29	\$37.22
211	Jul-43	Jul	2043	Summer	\$0.00	\$0.00	\$40.31	\$28.17	\$30.47	\$14.84	\$71.38	\$43.01
212	Aug-43	Aug	2043	Summer	\$0.00	\$0.00	\$40.40	\$27.82	\$24.25	\$12.66	\$64.65	\$40.48
213	Sep-43	Sep	2043	Summer	\$0.00	\$0.00	\$36.36	\$25.04	\$18.39	\$11.84	\$55.35	\$36.88
214	Oct-43	Oct	2043	Shoulder	\$0.00	\$0.00	\$34.77	\$23.35	\$15.32	\$13.13	\$50.69	\$37.07
215	Nov-43	Nov	2043	Shoulder	\$0.00	\$0.00	\$46.34	\$32.32	\$11.13	\$12.10	\$58.06	\$44.43
216	Dec-43	Dec	2043	Winter	\$0.00	\$0.00	\$72.61	\$50.00	\$4.43	\$12.30	\$77.04	\$62.30
217	Jan-44	Jan	2044	Winter	\$0.00	\$0.00	\$114.35	\$78.75	-\$4.55	\$5.35	\$109.79	\$84.70
218	Feb-44	Feb	2044	Winter	\$0.00	\$0.00	\$37.36	\$67.46	-\$2.40	\$8.20	\$35.56	\$75.66
219	Mar-44	Mar	2044	Shoulder	\$0.00	\$0.00	\$50.35	\$35.09	\$12.09	\$14.55	\$63.05	\$49.64
220	Apr-44	Apr	2044	Shoulder	\$0.00	\$0.00	\$40.72	\$28.04	\$13.30	\$11.69	\$54.62	\$39.73
221	May-44	May	2044	Summer	\$0.00	\$0.00	\$37.35	\$25.72	\$16.88	\$12.38	\$54.23	\$38.10
222	Jun-44	Jun	2044	Summer	\$0.00	\$0.00	\$39.32	\$27.08	\$16.78	\$10.70	\$56.09	\$37.77
223	Jul-44	Jul	2044	Summer	\$0.00	\$0.00	\$41.77	\$28.76	\$30.47	\$14.84	\$72.23	\$43.60
224	Aug-44	Aug	2044	Summer	\$0.00	\$0.00	\$41.25	\$28.40	\$24.25	\$12.66	\$65.50	\$41.07
225	Sep-44	Sep	2044	Summer	\$0.00	\$0.00	\$37.13	\$25.57	\$18.39	\$11.84	\$56.12	\$37.41
226	Oct-44	Oct	2044	Shoulder	\$0.00	\$0.00	\$35.50	\$24.45	\$15.32	\$13.13	\$51.42	\$37.58
227	Nov-44	Nov	2044	Shoulder	\$0.00	\$0.00	\$47.92	\$33.00	\$11.13	\$12.10	\$59.05	\$45.10
228	Dec-44	Dec	2044	Winter	\$0.00	\$0.00	\$74.13	\$51.05	\$4.43	\$12.30	\$78.56	\$63.35
229	Jan-45	Jan	2045	Winter	\$0.00	\$0.00	\$116.02	\$79.90	-\$4.55	\$5.35	\$111.46	\$85.85
230	Feb-45	Feb	2045	Winter	\$0.00	\$0.00	\$39.39	\$68.45	-\$2.40	\$8.20	\$36.39	\$76.65
231	Mar-45	Mar	2045	Shoulder	\$0.00	\$0.00	\$51.70	\$35.60	\$12.09	\$14.55	\$63.79	\$50.15
232	Apr-45	Apr	2045	Shoulder	\$0.00	\$0.00	\$41.31	\$28.45	\$13.30	\$11.69	\$55.22	\$40.14
233	May-45	May	2045	Summer	\$0.00	\$0.00	\$37.89	\$26.10	\$16.88	\$12.38	\$54.78	\$38.48
234	Jun-45	Jun	2045	Summer	\$0.00	\$0.00	\$39.89	\$27.47	\$16.78	\$10.70	\$56.67	\$38.17
235	Jul-45	Jul	2045	Summer	\$0.00	\$0.00	\$42.38	\$29.18	\$30.47	\$14.84	\$72.84	\$44.02
236	Aug-45	Aug	2045	Summer	\$0.00	\$0.00	\$41.85	\$28.82	\$24.25	\$12.66	\$66.10	\$41.48
237	Sep-45	Sep	2045	Summer	\$0.00	\$0.00	\$37.67	\$25.34	\$18.39	\$11.84	\$56.66	\$37.78
238	Oct-45	Oct	2045	Shoulder	\$0.00	\$0.00	\$36.02	\$24.81	\$15.32	\$13.13	\$51.94	\$37.33
239	Nov-45	Nov	2045	Shoulder	\$0.00	\$0.00	\$48.62	\$33.48	\$11.13	\$12.10	\$59.75	\$45.59
240	Dec-45	Dec	2045	Winter	\$0.00	\$0.00	\$75.21	\$51.80	\$4.43	\$12.30	\$79.64	\$64.10
241	Jan-46	Jan	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$4.55	\$5.35	-\$4.55	\$5.35
242	Feb-46	Feb	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$2.40	\$8.20	-\$2.40	\$8.20
243	Mar-46	Mar	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.55	\$12.09	\$14.55
244	Apr-46	Apr	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$13.30	\$11.69	\$13.30	\$11.69
245	May-46	May	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.88	\$12.38	\$16.88	\$12.38
246	Jun-46	Jun	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.78	\$10.70	\$16.78	\$10.70
247	Jul-46	Jul	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$30.47	\$14.84	\$30.47	\$14.84
248	Aug-46	Aug	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$24.25	\$12.66	\$24.25	\$12.66
249	Sep-46	Sep	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$11.84	\$18.39	\$11.84
250	Oct-46	Oct	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$15.32	\$13.13	\$15.32	\$13.13
251	Nov-46	Nov	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$11.13	\$12.10	\$11.13	\$12.10
252	Dec-46	Dec	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$4.43	\$12.30	\$4.43	\$12.30
253	Jan-47	Jan	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$4.55	\$5.35	-\$4.55	\$5.35
254	Feb-47	Feb	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$2.40	\$8.20	-\$2.40	\$8.20
255	Mar-47	Mar	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.55	\$12.09	\$14.55
256	Apr-47	Apr	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$13.30	\$11.69	\$13.30	\$11.69
257	May-47	May	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.88	\$12.38	\$16.88	\$12.38
258	Jun-47	Jun	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.78	\$10.70	\$16.78	\$10.70
259	Jul-47	Jul	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$30.47	\$14.84	\$30.47	\$14.84
260	Aug-47	Aug	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$24.25	\$12.66	\$24.25	\$12.66
261	Sep-47	Sep	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$11.84	\$18.39	\$11.84
262	Oct-47	Oct	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$15.32	\$13.13	\$15.32	\$13.13
263	Nov-47	Nov	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$11.13	\$12.10	\$11.13	\$12.10
264	Dec-47	Dec	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$4.43	\$12.30	\$4.43	\$12.30

Generation Capacity

Note: The 2027/2028 PJM Capacity Auction did not occur before the date of filing. Per discussion with the SWE, the established floor price of \$175/MW-day was used in the calculator in place of a settled value.

PJM BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028
PECO	PECO	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00

Seasonally Adjusted BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2025/2026	2025/2026	2026/2027	2027/2028	2021/2021	2021/2022	2025/2026	2026/2027	2027/2028	
PECO	PECO	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50

Seasonally Adjusted PJM BRA Results (Real \$/kW-year)											
Summer						Winter					
2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average	2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average
\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56	\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal \$/kW-year)																		
			Summer								Winter							
Act 129 PY	DYPY Start	DYPY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn	Inflation Flag	Input Flag
18	2026	2027	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
19	2027	2028	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
20	2028	2029	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	0	average
21	2029	2030	\$0.00	\$0.00	\$31.19	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.19	\$0.00	\$0.00	\$0.00	\$0.00	0	average
22	2030	2031	\$0.00	\$0.00	\$31.63	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.63	\$0.00	\$0.00	\$0.00	\$0.00	0	average
23	2031	2032	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	0	average
24	2032	2033	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	0	average
25	2033	2034	\$0.00	\$0.00	\$33.85	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.85	\$0.00	\$0.00	\$0.00	\$0.00	0	average
26	2034	2035	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	0	average
27	2035	2036	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	0	average
28	2036	2037	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	0	average
29	2037	2038	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	0	average
30	2038	2039	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	0	average
31	2039	2040	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	0	average
32	2040	2041	\$0.00	\$0.00	\$39.08	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.08	\$0.00	\$0.00	\$0.00	\$0.00	0	average
33	2041	2042	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	0	average
34	2042	2043	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	0	average
35	2043	2044	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	0	average
36	2044	2045	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	0	average
37	2045	2046	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	0	average
38	2046	2047	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	0	average
39	2047	2048	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	0	average

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$61.07	\$58.92	\$22.48	\$44.19	\$77.10	\$48.00	\$8.83
19	2027	2028	\$62.33	\$60.14	\$22.94	\$45.10	\$78.69	\$48.99	\$9.01
20	2028	2029	\$63.62	\$61.38	\$23.42	\$46.04	\$80.32	\$50.00	\$9.20
21	2029	2030	\$64.94	\$62.66	\$23.90	\$46.99	\$81.99	\$51.04	\$9.39
22	2030	2031	\$66.29	\$63.95	\$24.40	\$47.97	\$83.69	\$52.10	\$9.58
23	2031	2032	\$67.66	\$65.28	\$24.90	\$48.96	\$85.42	\$53.18	\$9.78
24	2032	2033	\$69.06	\$66.63	\$25.42	\$49.97	\$87.19	\$54.28	\$9.98
25	2033	2034	\$70.49	\$68.01	\$25.95	\$51.01	\$88.99	\$55.40	\$10.19
26	2034	2035	\$71.95	\$69.42	\$26.48	\$52.07	\$90.84	\$56.55	\$10.40
27	2035	2036	\$73.44	\$70.86	\$27.03	\$53.14	\$92.72	\$57.72	\$10.62
28	2036	2037	\$74.96	\$72.33	\$27.59	\$54.24	\$94.64	\$58.92	\$10.84
29	2037	2038	\$76.52	\$73.82	\$28.16	\$55.37	\$96.60	\$60.14	\$11.06
30	2038	2039	\$78.10	\$75.35	\$28.75	\$56.52	\$98.60	\$61.38	\$11.29
31	2039	2040	\$79.72	\$76.92	\$29.34	\$57.69	\$100.64	\$62.66	\$11.53
32	2040	2041	\$81.37	\$78.51	\$29.95	\$58.88	\$102.73	\$63.95	\$11.76
33	2041	2042	\$83.06	\$80.13	\$30.57	\$60.10	\$104.86	\$65.28	\$12.01
34	2042	2043	\$84.78	\$81.79	\$31.20	\$61.35	\$107.03	\$66.63	\$12.26
35	2043	2044	\$86.53	\$83.49	\$31.85	\$62.62	\$109.25	\$68.01	\$12.51
36	2044	2045	\$88.33	\$85.22	\$32.51	\$63.91	\$111.51	\$69.42	\$12.77
37	2045	2046	\$90.16	\$86.98	\$33.18	\$65.24	\$113.82	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer									
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn			
\$59.28	\$52.46	\$39.61	\$37.18	\$43.52	\$25.11	\$41.25			
\$64.43	\$55.82	\$47.21	\$42.64	\$45.52	\$26.68	\$46.27			
\$69.93	\$58.95	\$49.64	\$47.98	\$45.17	\$29.00	\$51.89			
\$76.21	\$62.16	\$51.04	\$53.05	\$45.79	\$31.55	\$56.92			
\$81.30	\$65.41	\$50.53	\$57.97	\$45.98	\$33.94	\$62.19			
\$82.99	\$66.77	\$51.57	\$59.17	\$46.93	\$34.64	\$63.48			
\$84.71	\$68.15	\$52.64	\$60.39	\$47.91	\$35.36	\$64.80			
\$86.46	\$69.56	\$53.73	\$61.65	\$48.90	\$36.09	\$66.14			
\$88.25	\$71.00	\$54.85	\$62.92	\$49.91	\$36.84	\$67.51			
\$90.08	\$72.47	\$55.98	\$64.23	\$50.94	\$37.60	\$68.91			
\$91.95	\$73.97	\$57.14	\$65.56	\$52.00	\$38.38	\$70.34			
\$93.85	\$75.51	\$58.33	\$66.91	\$53.08	\$39.17	\$71.79			
\$95.80	\$77.07	\$59.53	\$68.30	\$54.18	\$39.99	\$73.28			
\$97.78	\$78.67	\$60.77	\$69.72	\$55.30	\$40.81	\$74.80			
\$99.81	\$80.30	\$62.03	\$71.16	\$56.44	\$41.66	\$76.35			
\$101.87	\$81.96	\$63.31	\$72.63	\$57.61	\$42.52	\$77.93			
\$103.98	\$83.66	\$64.62	\$74.14	\$58.81	\$43.40	\$79.54			
\$106.14	\$85.39	\$65.96	\$75.67	\$60.03	\$44.30	\$81.19			
\$108.34	\$87.16	\$67.33	\$77.24	\$61.27	\$45.22	\$82.87			
\$110.58	\$88.97	\$68.72	\$78.84	\$62.54	\$46.16	\$84.59			

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$0.00	\$0.00	\$0.00	\$14.73	\$0.00	\$48.00	\$8.83
19	2027	2028	\$0.00	\$0.00	\$0.00	\$15.03	\$0.00	\$48.99	\$9.01
20	2028	2029	\$0.00	\$0.00	\$0.00	\$15.35	\$0.00	\$50.00	\$9.20
21	2029	2030	\$0.00	\$0.00	\$0.00	\$15.66	\$0.00	\$51.04	\$9.39
22	2030	2031	\$0.00	\$0.00	\$0.00	\$15.99	\$0.00	\$52.10	\$9.58
23	2031	2032	\$0.00	\$0.00	\$0.00	\$16.32	\$0.00	\$53.18	\$9.78
24	2032	2033	\$0.00	\$0.00	\$0.00	\$16.66	\$0.00	\$54.28	\$9.98
25	2033	2034	\$0.00	\$0.00	\$0.00	\$17.00	\$0.00	\$55.40	\$10.19
26	2034	2035	\$0.00	\$0.00	\$0.00	\$17.36	\$0.00	\$56.55	\$10.40
27	2035	2036	\$0.00	\$0.00	\$0.00	\$17.71	\$0.00	\$57.72	\$10.62
28	2036	2037	\$0.00	\$0.00	\$0.00	\$18.08	\$0.00	\$58.92	\$10.84
29	2037	2038	\$0.00	\$0.00	\$0.00	\$18.46	\$0.00	\$60.14	\$11.06
30	2038	2039	\$0.00	\$0.00	\$0.00	\$18.84	\$0.00	\$61.38	\$11.29
31	2039	2040	\$0.00	\$0.00	\$0.00	\$19.23	\$0.00	\$62.66	\$11.53
32	2040	2041	\$0.00	\$0.00	\$0.00	\$19.63	\$0.00	\$63.95	\$11.76
33	2041	2042	\$0.00	\$0.00	\$0.00	\$20.03	\$0.00	\$65.28	\$12.01
34	2042	2043	\$0.00	\$0.00	\$0.00	\$20.45	\$0.00	\$66.63	\$12.26
35	2043	2044	\$0.00	\$0.00	\$0.00	\$20.87	\$0.00	\$68.01	\$12.51
36	2044	2045	\$0.00	\$0.00	\$0.00	\$21.30	\$0.00	\$69.42	\$12.77
37	2045	2046	\$0.00	\$0.00	\$0.00	\$21.75	\$0.00	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter									
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn			
\$0.11	\$6.70	\$10.26	\$5.79	\$16.27	\$32.44	\$5.05			
\$0.12	\$7.21	\$5.67	\$5.97	\$16.76	\$36.48	\$6.06			
\$0.18	\$8.16	\$5.54	\$6.24	\$19.33	\$39.40	\$7.01			
\$0.18	\$8.64	\$5.08	\$6.58	\$20.57	\$41.88	\$7.93			
\$0.29	\$9.68	\$7.16	\$7.24	\$22.70	\$44.30	\$9.02			
\$0.29	\$9.88	\$7.31	\$7.39	\$23.17	\$45.22	\$9.21			
\$0.30	\$10.09	\$7.46	\$7.54	\$23.65	\$46.16	\$9.40			
\$0.30	\$10.30	\$7.62	\$7.69	\$24.14	\$47.12	\$9.59			
\$0.31	\$10.51	\$7.78	\$7.85	\$24.64	\$48.09	\$9.79			
\$0.32	\$10.73	\$7.94	\$8.02	\$25.15	\$49.09	\$9.99			
\$0.32	\$10.95	\$8.10	\$8.18	\$25.67	\$50.10	\$10.20			
\$0.33	\$11.18	\$8.27	\$8.35	\$26.20	\$51.14	\$10.41			
\$0.34	\$11.41	\$8.44	\$8.53	\$26.74	\$52.20	\$10.63			
\$0.34	\$11.65	\$8.62	\$8.70	\$27.30	\$53.28	\$10.85			
\$0.35	\$11.89	\$8.80	\$8.88	\$27.86	\$54.39	\$11.07			
\$0.36	\$12.13	\$8.98	\$9.07	\$28.44	\$55.51	\$11.30			
\$0.37	\$12.39	\$9.16	\$9.25	\$29.03	\$56.66	\$11.53			
\$0.37	\$12.64	\$9.35	\$9.45	\$29.63	\$57.84	\$11.77			
\$0.38	\$12.90	\$9.55	\$9.64	\$30.25	\$59.04	\$12.02			
\$0.39	\$13.17	\$9.75	\$9.84	\$30.87	\$60.26	\$12.27			

Summer Transmission (\$/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	\$22.48	PECO
PPL	\$48.00	PPL
Duquesne Light	\$61.07	DLC
FE: Met-Ed	\$58.92	Met-Ed
FE: Penelec	\$44.19	Penelec
FE: Penn Power	\$77.10	Penn Power
FE: West Penn Power	\$8.83	West Penn

Summer Distribution (\$/kW-year Nominal)						
EDC	2026	2027	2028	2029	2030	Tool Lookup
PECO	\$39.61	\$47.21	\$49.64	\$51.04	\$50.53	PECO
PPL	\$25.11	\$26.68	\$29.00	\$31.55	\$33.94	PPL
Duquesne Light	\$59.28	\$64.43	\$69.93	\$76.21	\$81.30	DLC
FE: Met-Ed	\$52.46	\$55.82	\$58.95	\$62.16	\$65.41	Met-Ed
FE: Penelec	\$37.18	\$42.64	\$47.98	\$53.05	\$57.97	Penelec
FE: Penn Power	\$43.52	\$45.52	\$45.17	\$45.79	\$45.98	Penn Power
FE: West Penn Power	\$41.25	\$46.27	\$51.89	\$56.92	\$62.19	West Penn

Winter Transmission (\$/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	\$0.00	PECO
PPL	\$48.00	PPL
Duquesne Light	\$0.00	DLC
FE: Met-Ed	\$0.00	Met-Ed
FE: Penelec	\$14.73	Penelec
FE: Penn Power	\$0.00	Penn Power
FE: West Penn Power	\$8.83	West Penn

Winter Distribution (\$/kW-year Nominal)						
EDC	2026	2027	2028	2029	2030	Tool Lookup
PECO	\$10.26	\$5.67	\$5.54	\$5.08	\$7.16	PECO
PPL	\$32.44	\$36.48	\$39.40	\$41.88	\$44.30	PPL
Duquesne Light	\$0.21	\$0.12	\$0.18	\$0.18	\$0.29	DLC
FE: Met-Ed	\$6.70	\$7.21	\$8.16	\$8.64	\$9.68	Met-Ed
FE: Penelec	\$5.79	\$5.97	\$6.24	\$6.58	\$7.24	Penelec
FE: Penn Power	\$16.27	\$16.76	\$19.33	\$20.57	\$22.70	Penn Power
FE: West Penn Power	\$5.05	\$6.06	\$7.01	\$7.93	\$9.02	West Penn

Adjustments

Record Field	Period	Month	Year	Transco 6 (Non-NY)	Locational Gas Adjustment (\$/MMBtu)
1	Jan-26	Jan	2026	\$7.51	\$3.233
2	Feb-26	Feb	2026	\$6.39	\$2.343
3	Mar-26	Mar	2026	\$3.43	-\$0.263
4	Apr-26	Apr	2026	\$3.02	-\$0.580
5	May-26	May	2026	\$2.82	-\$0.806
6	Jun-26	Jun	2026	\$3.01	-\$0.778
7	Jul-26	Jul	2026	\$3.33	-\$0.642
8	Aug-26	Aug	2026	\$3.32	-\$0.713
9	Sep-26	Sep	2026	\$2.83	-\$1.155
10	Oct-26	Oct	2026	\$2.73	-\$1.308
11	Nov-26	Nov	2026	\$3.49	-\$0.756
12	Dec-26	Dec	2026	\$5.37	\$0.705
13	Jan-27	Jan	2027	\$8.06	\$3.154
14	Feb-27	Feb	2027	\$6.93	\$2.357
15	Mar-27	Mar	2027	\$3.64	-\$0.273
16	Apr-27	Apr	2027	\$3.07	-\$0.439
17	May-27	May	2027	\$2.74	-\$0.743
18	Jun-27	Jun	2027	\$2.94	-\$0.674
19	Jul-27	Jul	2027	\$3.14	-\$0.623
20	Aug-27	Aug	2027	\$3.10	-\$0.731
21	Sep-27	Sep	2027	\$2.77	-\$1.024
22	Oct-27	Oct	2027	\$2.66	-\$1.204
23	Nov-27	Nov	2027	\$3.69	-\$0.365
24	Dec-27	Dec	2027	\$5.51	\$1.039
25	Jan-28	Jan	2028	\$8.23	\$3.466
26	Feb-28	Feb	2028	\$7.04	\$2.658
27	Mar-28	Mar	2028	\$3.76	\$0.011
28	Apr-28	Apr	2028	\$2.90	-\$0.414
29	May-28	May	2028	\$2.73	-\$0.572
30	Jun-28	Jun	2028	\$2.80	-\$0.626
31	Jul-28	Jul	2028	\$2.89	-\$0.709
32	Aug-28	Aug	2028	\$2.84	-\$0.819
33	Sep-28	Sep	2028	\$2.67	-\$0.969
34	Oct-28	Oct	2028	\$2.54	-\$1.151
35	Nov-28	Nov	2028	\$3.52	-\$0.357
36	Dec-28	Dec	2028	\$5.36	\$1.050
37	Jan-29	Jan	2029	\$8.06	\$3.483
38	Feb-29	Feb	2029	\$6.96	\$2.672
39	Mar-29	Mar	2029	\$3.61	\$0.018
40	Apr-29	Apr	2029	\$2.97	-\$0.187
41	May-29	May	2029	\$2.78	-\$0.358
42	Jun-29	Jun	2029	\$2.90	-\$0.407
43	Jul-29	Jul	2029	\$3.00	-\$0.483
44	Aug-29	Aug	2029	\$2.96	-\$0.597
45	Sep-29	Sep	2029	\$2.78	-\$0.760
46	Oct-29	Oct	2029	\$2.66	-\$0.953
47	Nov-29	Nov	2029	\$3.35	-\$0.445
48	Dec-29	Dec	2029	\$5.16	\$0.920

Month	Locational Adjustment (\$/MMBtu)	Load Shape	Spark Spread On-Peak (\$/MWh)	Spark Spread Off-Peak (\$/MWh)		
Jan	\$3.33	208.4%	-\$4.65	\$5.83	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.	
Feb	\$2.51	178.6%	-\$2.45	\$8.04		
Mar	-\$0.13	92.9%	\$11.85	\$14.25		
Apr	-\$0.40	74.2%	\$13.62	\$11.45		
May	-\$0.62	68.1%	\$16.54	\$12.13		
Jun	-\$0.62	71.7%	\$16.44	\$10.48		
Jul	-\$0.61	76.1%	\$29.85	\$14.54		
Aug	-\$0.71	75.2%	\$23.76	\$12.40		
Sep	-\$0.98	67.7%	\$18.60	\$11.60		
Oct	-\$1.15	64.7%	\$15.59	\$12.86		
Nov	-\$0.48	87.4%	\$10.90	\$11.85		
Dec	\$0.93	135.1%	\$4.34	\$12.05		

AEPS

Year	2026
Load (MWh)	1,000

Credit	Tier Req (weight)	Price
Solar	0.5%	\$37.25
Tier I	8.0%	\$34.20
Tier II	10.0%	\$39.63

Required Credits	Cost
5	\$186
80	\$2,736
100	\$3,963
Total	185
	\$6,885

Weighted Avg. Price (Per Credit)
\$37.21

Weighted Avg. Price (Per MWh)
\$6.88

Alternative Energy 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

EXHIBIT 1
(REDLINE)

PECO Program Years 18 to 22

Act 129 – Phase V Energy Efficiency and Conservation Plan

Submitted to:



Pennsylvania Public Utility Commission

Submitted by:



| ~~December 1~~ February 24, ~~2025~~ 2026

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Table of Acronyms

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

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

Mapping of Program Years to Dates

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

1. Overview of Plan

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

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

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

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

Figure 1. PECO's Phase V Program Structure, Savings, and Budget^{1,2}



1.1 Summary Description of Plan, Objectives, and Overall Strategy

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

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

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

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

² Compliance for peak demand reductions are measured at the system level and compliance for energy savings are measured at the meter level per the Phase V Final Implementation Order. Peak demand reductions shown in this figure and throughout the filing are at the system level, whereas energy savings are shown at the meter level.

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

The EE&C Plan objectives include:

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

PECO developed its program portfolio to offer [a](#) holistic, easy customer experience across its service territory.

Key features of PECO's Plan include:

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

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

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

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

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

1. **Program Structure and CSP Framework:** PECO first established the overall program architecture, including defining the payment structure for CSPs and outlining expectations for program development, implementation, and performance metric tracking. This framework allowed for consistency across delivery channels while allowing flexibility for CSP innovation.
2. **Integration of Regulatory and Market Data:** To ~~develop~~^{inform} program budgets, plan savings targets, and design parameters, PECO referenced the 2026 TRM to inform savings calculations,²³ the Pennsylvania Statewide Evaluator (“SWE”) Baseline³⁴ and Potential Studies⁴⁵ to determine plan savings targets and budget by program, the Phase V Tentative⁵⁶ and Final⁶⁷ Implementation Orders to identify specific regulatory requirements to incorporate into the Scope of Work, and the lessons learned from the Phase IV evaluation and research to address customer needs and improve program effectiveness.
3. **Scope of Work and Competitive Bidding:** PECO issued an RFI on March 5, 2025, to engage the market and to identify innovative implementation approaches. PECO developed a detailed scope of work to specify program design elements, performance requirements, and compliance obligations. PECO then initiated a competitive RFP process,⁷⁸ inviting CSPs to submit proposals that met these criteria and aligned with Phase V objectives.

²³ Pennsylvania Statewide Act 129 2026 TRM, September 2024, 2026 Technical Reference Manual Final Order.

³⁴ 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, February 2023, 2023 Residential Baseline Study, 2023 Non-Residential Baseline Study, February 2023, 2023 Non-Residential Baseline Study.

⁴⁵ Pennsylvania Act 129 - Phase V Energy Efficiency and Peak Demand Reduction Market Potential Study Report, February 2023, Phase V Energy Efficiency and Peak Demand Reduction Potential Study Report
Phase V Demand Response Potential Study, February 2025, Phase V Demand Response Potential Study Report.

⁵⁶ Phase V Tentative Implementation Order – The Act 129 Phase V EE&C Program Tentative Implementation Order, From the Public Meeting of February 2025, Docket No. M-2025-3052826.

⁶⁷ Phase V Final Implementation Order – The Act 129 Phase V EE&C Program Implementation Order, From the Public Meeting of June 2025, Docket No. M-2025-3052826.

⁷⁸ The RFP for the Residential HER Program was issued by Exelon for support to all Exelon Operating Companies.

Key elements of the CSP Scope of Work include:

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

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

- **Budget development:** CSPs defined total program component budgets, given the constraints outlined from PECO's modeling efforts, specifying allocations between customer incentives and CSP delivery costs. PECO emphasized maximizing incentive budgets to drive participation and deliver greater benefits to ratepayers;
- **Program implementation plans:** PECO required CSPs to adopt a rigorous approach informed by regulatory and market data. CSPs reviewed the Phase V Final Order and the SWE Potential Studies to align program strategies with statewide objectives;
- **Program structure and delivery components:** CSPs proposed detailed program architecture, delivery mechanisms, and eligible measure portfolios that leverage historical PECO participation and savings data, evaluation reports from prior years, and direct input from market actors; and
- **Savings calibration and forecasting:** CSPs calibrated savings estimates to the 2026 Technical Reference Manual ("TRM") and developed forward-looking adoption forecasts for each measure through 2031.

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

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

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

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

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

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

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

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

Table 1. Summary of PECO's Phase V Plan: Portfolio Lifetime Costs and Benefits⁹

Sector	Total Discounted Lifetime Costs (\$000) ^{8,10}	Total Discounted Lifetime Benefits (\$000)	Present Value of Net Benefits (\$000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low-Income)	~~\$344,312~~ <u>\$343,374</u>	~~\$314,199~~ <u>\$312,339</u>	~~-\$30,113~~ <u>\$31,035</u>	0.9
Residential Low-Income	~~\$62,503~~ <u>\$54,379</u>	~~\$78,938~~ <u>\$67,170</u>	~~\$16,435~~ <u>\$12,790</u>	~~1.3~~ <u>1.2</u>
Small Commercial & Industrial ⁹	~~\$316,367~~ <u>\$316,397</u>	~~\$449,338~~ <u>\$412,893</u>	~~\$132,972~~ <u>\$96,496</u>	~~1.4~~ <u>1.3</u>
Large Commercial & Industrial	~~\$375,196~~ <u>\$387,473</u>	~~\$534,973~~ <u>\$540,583</u>	~~\$159,777~~ <u>\$153,109</u>	1.4
Total Portfolio	~~\$1,098,378~~ <u>\$1,101,623</u>	~~\$1,377,448~~ <u>\$1,332,984</u>	~~\$279,070~~ <u>\$231,361</u>	~~1.3~~ <u>1.2</u>

⁹ In this and subsequent tables, unless otherwise noted, SCI and LCI totals include the Municipal Lighting sector

^{8,10} Lifetime costs and benefits have all been discounted to PY18

⁹ In this and subsequent tables, unless otherwise noted, SCI and LCI totals include the Municipal Lighting sector

Table 2 summarizes portfolio energy savings using Act 129 accounting conventions. Reported values reflect incremental annual savings achieved within the program year, which are weather normalized to account for variations in heating and cooling loads. Savings are presented at both the meter level, representing customer-side impacts, and the system level, which adjusts for transmission and distribution losses.

Additionally, results are shown as gross savings prior to adjustments for free ridership and spillover. These distinctions support consistency with Act 129 protocols and provide a transparent basis for compliance and cost-effectiveness evaluation.

Table 2. Summary of PECO's Phase V Plan: Summary of Portfolio Energy Savings¹¹

Baseline	39,386,000		39,386,000		39,386,000		39,386,000		39,386,000		39,386,000	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	~~72,625~~ <u>63,486</u>	~~645,554~~ <u>537,232</u>	~~84,856~~ <u>81,204</u>	~~699,524~~ <u>656,016</u>	~~75,370~~ <u>80,879</u>	~~667,805~~ <u>733,524</u>	~~76,894~~ <u>91,739</u>	~~676,575~~ <u>855,617</u>	~~74,823~~ <u>67,262</u>	~~670,992~~ <u>578,061</u>	384,569	3,360,450
Residential Low-Income Sub-Sector – Projected Incremental Savings ¹²	~~16,025~~ <u>14,527</u>	~~104,292~~ <u>92,487</u>	~~15,352~~ <u>13,839</u>	~~101,968~~ <u>90,100</u>	~~15,870~~ <u>14,321</u>	~~104,793~~ <u>92,736</u>	~~16,223~~ <u>14,432</u>	~~106,967~~ <u>93,536</u>	~~14,104~~ <u>11,853</u>	~~95,124~~ <u>78,976</u>	~~77,574~~ <u>68,972</u>	~~513,140~~ <u>447,834</u>
SCI Sector – Projected Incremental Savings ¹⁰	74,481	~~1,102,097~~ <u>1,103,833</u>	~~95,968~~ <u>93,529</u>	~~1,420,464~~ <u>1,385,718</u>	~~100,064~~ <u>96,600</u>	~~1,479,581~~ <u>1,421,471</u>	~~111,167~~ <u>107,098</u>	~~1,350,560~~ <u>1,291,767</u>	~~70,952~~ <u>66,038</u>	~~1,046,703~~ <u>975,336</u>	~~452,631~~ <u>437,207</u>	~~6,399,405~~ <u>6,178,125</u>
LCI Sector – Projected Incremental Savings	~~75,055~~ <u>75,056</u>	~~1,111,847~~ <u>1,113,583</u>	~~100,758~~ <u>106,885</u>	~~1,496,526~~ <u>1,590,240</u>	~~120,436~~ <u>123,126</u>	~~1,790,188~~ <u>1,832,449</u>	~~144,407~~ <u>147,554</u>	~~1,853,365~~ <u>1,902,768</u>	~~102,645~~ <u>106,242</u>	~~1,525,485~~ <u>1,581,770</u>	~~543,301~~ <u>558,864</u>	~~7,777,411~~ <u>8,020,810</u>
EE&C Plan Total – Projected Incremental Savings	~~238,186~~ <u>227,550</u>	~~2,963,790~~ <u>2,847,135</u>	~~296,934~~ <u>295,457</u>	~~3,718,483~~ <u>3,722,074</u>	~~311,740~~ <u>314,386</u>	~~4,042,366~~ <u>4,080,180</u>	~~348,691~~ <u>360,824</u>	~~3,987,467~~ <u>4,143,688</u>	~~262,524~~ <u>251,395</u>	~~3,338,300~~ <u>3,214,143</u>	~~1,458,076~~ <u>1,449,612</u>	~~18,050,406~~ <u>18,007,220</u>
EE&C Plan Total – Projected Cumulative Savings	~~238,186~~ <u>227,550</u>	~~2,963,790~~ <u>2,847,135</u>	~~535,120~~ <u>523,007</u>	~~6,682,273~~ <u>6,569,209</u>	~~846,860~~ <u>837,393</u>	~~10,724,639~~ <u>10,649,389</u>	~~1,195,552~~ <u>1,198,217</u>	~~14,712,106~~ <u>14,793,077</u>	~~1,458,076~~ <u>1,449,612</u>	~~18,050,406~~ <u>18,007,220</u>	~~1,458,076~~ <u>1,449,612</u>	~~18,050,406~~ <u>18,007,220</u>
EE&C Plan Total – Percentage of Target to be Met ¹³	~~24~~ <u>20</u> %		~~48~~ <u>47</u> %		~~76~~ <u>75</u> %		108%		~~131~~ <u>130</u> %		~~131~~ <u>130</u> %	
Estimated Phase IV												

¹¹ SCI Sector and LCI Sector totals include street lighting measures which may be a part of the Municipal Lighting sector

¹² Costs for master-metered projects are recovered from the Small and Large C&I sectors. Low-income master-metered buildings are recovered from of the Small and Large C&I sectors and are counted towards the low income carveout target.

¹⁰ SCI Sector totals include street lighting measures which may be a part of the Municipal Lighting sector

Carryover Savings ¹⁴¹³											171,867	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	410,053,399,417		706,987,694,874		1,018,727,1009,260		1,367,419,1370,084		1,629,943,1621,479		1,629,943,1621,479	
Cumulative Percent Reduction from Baseline	1%		1%		2%		3%		4%		4%	
Commission-Identified Goal											1,111,685	

Table 3 and Table 4 present the key peak demand accounting elements for Phase V as outlined in the Phase V Final Order. Table 3 summarizes overall demand savings requirements and compliance metrics, providing a consolidated view of total plan peak demand reduction targets across the program portfolio.

Table 4 complements this summary by detailing seasonal demand savings, distinguishing between summer and winter performance. Together, these tables provide peak demand reduction savings for demand impacts aligning TRM methodologies for accurate evaluation.

Table 3. Summary of PECO's Phase V Plan: Summary of Portfolio Demand Savings

Baseline	7,899	7,899	7,899	7,899	7,899	7,899
Market Rate Residential Sector (<i>exclusive of Low-Income</i>) – Projected Incremental Annual Savings	11.910.5	17.416.8	15.216.1	14.416.7	13.412.2	72.2
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	2.62.3	2.52.1	2.62.2	2.62.2	2.31.9	12.610.7
SCI Sector – Projected Incremental Annual Savings	11.912.0	15.315.2	16.316.0	17.016.6	11.110.4	71.670.2

¹⁴¹³ Phase IV carryover savings were estimated using the phase-to-date verified totals from the PY16 SWE Report and PECO's PY17 Q1 reported savings values extrapolated over a full program year.

LCI Sector – Projected Incremental Annual Savings	14.0	~~48.1~~ <u>18.8</u>	~~21.1~~ <u>21.9</u>	~~24.6~~ <u>25.5</u>	~~19.4~~ <u>20.3</u>	~~97.1~~ <u>100.5</u>
Coincident Demand Reduction from EE Subtotal	~~40.4~~<u>38.8</u>	~~53.2~~<u>53.0</u>	~~55.2~~<u>56.1</u>	~~58.6~~<u>61.0</u>	~~46.1~~<u>44.7</u>	~~253.6~~<u>253.5</u>
Residential Load Shifting - Projected MW Savings	8.7	9.4	10.3	11.3	12.4	10.4
SCI Sector Load Shifting – Projected MW Savings	0.1	0.1	0.1	0.1	0.1	0.1
LCI Sector Load Shifting – Projected MW Savings	0.1	0.3	0.4	0.5	0.5	0.4
Daily Load Shifting Subtotal	8.9	9.9	10.9	11.9	13.0	10.9
Cumulative Projected Compliance Savings	~~42.2~~<u>40.6</u>	~~97.4~~<u>95.5</u>	~~154.8~~<u>153.8</u>	~~215.8~~<u>217.2</u>	264.5	264.5
Cumulative EE&C Plan Total – Percentage of Target to be Met	~~22~~<u>21</u>%	~~50~~<u>49</u>%	79%	111%	136%	136%
Estimated Phase IV Carryover Savings						7.2
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	~~49.4~~<u>47.8</u>	~~104.6~~<u>102.7</u>	~~162.0~~<u>161.0</u>	~~223.0~~<u>224.4</u>	271.7	271.7
Cumulative Percent Reduction from Baseline	~~0.53~~<u>0.51</u>%	~~1.23~~<u>1.21</u>%	~~1.96~~<u>1.95</u>%	~~2.73~~<u>2.75</u>%	3.35%	3.35%
Commission-Identified Goal						194.8

Table 4. Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW	Winter MW	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	~~17.4~~ <u>15.0</u>	~~11.6~~ <u>10.5</u>	~~23.7~~ <u>22.5</u>	~~16.1~~ <u>15.4</u>	~~21.3~~ <u>22.1</u>	~~14.3~~ <u>14.4</u>	~~20.1~~ <u>23.0</u>	~~13.9~~ <u>14.8</u>	~~19.0~~ <u>16.8</u>	~~12.3~~ <u>11.2</u>	~~101.5~~ <u>99.4</u>	~~68.2~~ <u>66.4</u>
Coincident Reduction from EE - Non-Residential	~~28.3~~ <u>28.5</u>	~~23.4~~ <u>23.6</u>	~~36.4~~ <u>37.4</u>	30.6	~~40.4~~ <u>41.3</u>	~~34.5~~ <u>34.4</u>	~~43.4~~ <u>44.2</u>	~~39.9~~ <u>40.0</u>	~~31.3~~ <u>31.7</u>	~~29.6~~ <u>29.7</u>	~~179.5~~ <u>183.1</u>	~~157.9~~ <u>158.2</u>
Daily Load Shifting - Residential	6.1	11.2	6.7	12.2	7.4	13.3	8.2	14.4	9.0	15.7	7.5	13.4
Daily Load Shifting - Non-Residential	0.2	0.2	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.5	0.5
Total											~~289.0~~ <u>290.5</u>	~~240.0~~ <u>238.4</u>
Phase V Peak Demand											194.8	

Reduction Target												
Percentage of Goal in Season											148149%	123122%

Table 5 provides a summary of the portfolio costs by sector.

Table 5. Summary of Portfolio Costs¹⁴

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
Residential Market Rate	\$16,88815,859	2221%	\$18,46118,047	2221%	\$17,75618,385	20%	\$18,16119,898	1921%	\$18,24717,324	22%	\$89,513	21%
Residential Low-Income	\$9,3589,435	1213%	\$9,4019,509	11%	\$9,7129,823	11%	\$10,0029,994	1110%	\$8,6758,213	1110%	\$47,14746,974	11%
SCI ¹²	\$18,52118,552	2425%	\$21,85221,714	2625%	\$23,54523,179	26%	\$24,62924,214	2625%	\$18,77518,194	23%	\$107,323105,853	25%
LCI	\$17,53717,558	23%	\$21,96322,754	2627%	\$25,62625,890	2829%	\$28,41428,707	30%	\$22,58822,888	2829%	\$116,127117,796	2728%
Common Costs	\$13,45513,450	18%	\$13,45513,450	16%	\$13,45513,450	15%	\$13,45513,450	14%	\$13,45513,450	1617%	\$67,27567,250	16%
Total Portfolio Budget	\$75,75974,854	100%	\$85,13285,474	100%	\$90,09490,727	100%	\$94,66196,263	100%	\$81,74080,069	100%	\$427,386	
SWE Cost	\$0		\$0		\$0		\$0		\$0		\$0	

¹⁴ SCI and LCI Totals are inclusive of Municipal Lighting

¹² SCI Totals are inclusive of Municipal Lighting

1.4 Summary of Program Implementation

Program implementation from Phase IV to Phase V will be as seamless as possible based on PECO's planning for Phase V. Data tracking and evaluation, measurement, and verification ("EM&V") startup activities will begin in January 2026. In March 2026, PECO and program implementation CSPs will begin the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach are in place. The programs will launch on June 1, 2026, and implementation will occur from June 1, 2026, through May 31, 2031.

1.5 Summary Description of PECO's Strategy to Acquire at Least 15% of Its Consumption Reduction and Peak Demand Reduction Target Each Year

PECO's program portfolio is designed to produce significant savings in each of the five program years. As indicated in Table 2 and Table 3, PECO projects that no less than 15% of the five-year savings and peak demand reduction compliance targets will be achieved in each program year.

1.6 Summary Description of PECO's Implementation Strategy to Acquire at Least 75% of the Portfolio Megawatt Compliance Target in Each Season

PECO's program portfolio is structured to achieve at least 75% of the seasonal megawatt (MW) plan target in each program cycle. Throughout Phase V, PECO will collaborate closely with CSPs to monitor performance and confirm that progress toward this target is consistently tracked and maintained, enabling timely adjustments and successful compliance across the phase. Seasonal PDRs in compliance with the portfolio megawatt plan target are detailed in Table 4.

1.7 Summary Descriptions of PECO's Implementation Strategy to Manage the EE&C Portfolio and Engage Customers and Trade Allies

PECO will take several steps to confirm the effective Act 129-compliant implementation of this EE&C Plan. These steps include:

- **Close Coordination Between PECO and the CSPs:** PECO will oversee the performance and service obligations of CSPs and make sure the CSPs' delivery is aligned with the approved EE&C Plan.
- **Coordination with Non-Act 129 Programs:** In addition to programs implemented under Act 129, PECO is exploring collaborations with other initiatives in its service territory in an effort to maximize savings and improve customer experience. This includes, but is not limited to, exploring aligning PECO's electric energy efficiency programs with PECO's natural gas efficiency offerings, braiding funding with the Pennsylvania Department of Environmental Protection ("PA DEP"), administration of

Inflation Reduction Act (IRA) home energy rebate programs, and exploring collaboration with the City of Philadelphia's housing programs, such as the Basic Systems Repair Program.¹³¹⁵ Low-income subprogram components may coordinate with PECO's Low-Income Usage Reduction Program ("LIURP"),¹⁴¹⁶ [PECO's Customer Assistance Program \(CAP\)](#),¹⁷ the Low Income Home Energy Assistance Program ("LIHEAP"),¹⁵¹⁸ and the Weatherization Assistance Program ("WAP"),¹⁶¹⁹ where appropriate. These partnerships aim to expand program reach, integrate resources, and deliver additional energy savings for customers. Additionally, PECO is exploring opportunities to collaborate with the City of Philadelphia's HOME Plan, which includes multiple programs focused on improving home condition and implementing health and safety upgrades.

- **Customer and Market Actor Experience:** A positive customer and market actor experience is essential. CSPs will work closely with customers throughout Phase V to help incorporate energy efficiency into their long-term planning projects. Customers will be offered innovative options to engage with the program and market actors will be supported for their program participation.
- **Trade Ally Engagement:** PECO's programs will use a collaborative approach to engage a diverse network of trade allies including contractors, distributors, and other market actors who are essential to delivering Act 129 programs. Engagement strategies include targeted recruitment, inclusive outreach, structured onboarding, and ongoing training, supported by clear guidelines, user-friendly portals, and regular communication. Trade allies will receive technical assistance, marketing resources, and streamlined processes to reduce administrative burdens while supporting quality installations and customer satisfaction. [For example, PECO will continue collaboration opportunities with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters. PECO will reach out to the Energy Coordinating Agency and any other existing programs in PECO's service territory that provide heat pump training to provide an opportunity to include them in any discussions.](#)
- **E&O:** PECO will have an E&O CSP responsible for educating residential, low-income, and multifamily customers about energy efficiency programs, generating qualified leads, and managing outreach activities. The E&O CSP will deliver accessible, innovative, and measurable outreach; collaborate with PECO and community partners; and provide regular reports on the impact of E&O activities. E&O CSP activities may include but are not limited to:
 - Engage and educate customers (residential, low-income, and multifamily) about energy efficiency through events, materials, and presentations.
 - Generate and track qualified leads for PECO's Act 129 programs, focusing on measurable outcomes.
 - Host or attend community events to educate and generate leads.

¹³¹⁵ PHDC, Basic Systems Repair Program.

¹⁴¹⁶ PECO, Low-Income Usage Reduction Program (LIURP).

¹⁷ [CAP, Customer Assistance Program - Percentage of Income Payment Plan \(CAP-PIPP\)](#)

¹⁵¹⁸ PECO, Low-Income Home Energy Assistance Program (LIHEAP).

¹⁶¹⁹ Pennsylvania Department of Community & Economic Development, Weatherization Assistance Program (WAP).

- Manage the Energy Force Ambassador program, which empowers people with disabilities to become energy efficiency educators and ambassadors in the greater Philadelphia region.
 - Implement accessible and equitable outreach, targeting underserved communities and using multilingual and accessible strategies.
 - Report regularly to PECO on activities, lead generated, and event metrics.
 - Collaborate with PECO teams, external partners, and community organizations.
 - Continuously improve outreach and education tactics based on feedback and performance data.
- **Data Tracking System:** A third-party database vendor will maintain PECO's tracking database. Database protocols support accurate data entry through proper field definitions and input validations. Program activity tracking queries facilitate program tracking and reporting for PECO and the PUC. The implementation CSPs upload program data into the database at defined intervals and according to the data protocols. The independent evaluation contractor can access the information in the database.
 - **Pre-Launch Period:** The implementation schedule for each program includes a pre-launch period to properly prepare for the program launch. This time will be used to refine the program, develop protocols and training materials, recruit trade allies, conduct educational activities, and develop and print incentive applications. The elements will be in place prior to full program operation. They will also be reviewed during process evaluations so that improvements may be incorporated during this plan cycle.
 - **Continuous Improvement:** PECO and its independent evaluation contractor will regularly review program protocols, procedures, participant and market actor satisfaction, savings, and spending to identify and address issues that arise during program operation and to facilitate ongoing program improvement.

1.8 Summary Description of PECO's Data Management, Quality Assurance, and Evaluation Processes

PECO's data tracking system collects and stores program and invoice data from CSPs. CSPs will input projects and determine incentives. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will support PECO's quality assurance (QA) process and EM&V requirements. PECO will use evaluation findings to prioritize the implementation of high-value measures.

1.9 Summary Description of the Cost Recovery Mechanism

As Act 129 requires, PECO's EE&C Plan costs are recoverable through a 66 Pa. C.S. § 1307 cost-recovery mechanism. In its Phase V Final Order, the PUC provided direction on the cost recovery tariff mechanism. The Commission described a Phase V mechanism like the Phase I through Phase IV mechanisms. The mechanism will be designed to recover (on a full and current basis, without interest, from each customer class) all prudent and reasonable EE&C Plan costs assigned to each class. In addition, the PUC required that the mechanism be reconciled annually with revised rates effective June 1 of each program year. PECO proposes

to use a cost recovery mechanism like those used in prior phases but modified to meet the additional Phase V requirements.

As with Phase I through Phase IV, PECO's proposed Phase V cost recovery mechanism includes four separate recovery charges, one for the Residential rate class (which includes low-income customers), one for the Small Commercial and Industrial (SCI) rate class, one for the Large Commercial and Industrial (LCI) rate class, and one for the Municipal Lighting rate class (streetlights, and alley lights).⁴⁷²⁰ For the government, nonprofit, and institutional (GNI) customers defined in Act 129, PECO does not have a separate recovery mechanism because its electric accounts are included in the SCI and LCI rate classes. Four separate charges were developed to confirm that the rate classes financing the measures are those receiving the direct energy and conservation benefits. Section 7 includes a detailed description of and estimated values for the cost recovery mechanisms.

⁴⁷²⁰ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

2. Energy-Efficiency Portfolio/Program Summary Tables and Charts

Section 2 of PECO's EE&C Plan provides a comprehensive quantitative overview of the five-year phase period. Section 2.1 describes the portfolio of programs and summarizes total energy savings. Section [2.2](#) offers a deeper analysis of the portfolio, including cost-effectiveness results, annual energy savings, and peak demand reductions broken down by year and seasonal trends. Section 2.3 presents the budget framework and parity analysis, comparing program expenditures with the overall EE&C budget as well as PECO's total revenue and sales.

2.1 Market Rate Residential, Residential Low-Income, SCI, and LCI Sector Summaries

Table 6 provides brief summaries, as well as the energy and peak demand reductions for each program.

Table 6. Program ~~Summaries~~[Summaries](#)

Residential Program	Residential Energy Efficiency	Residential	The program goal is to increase the energy efficiency and peak demand reduction in residential spaces through a variety of incentive mechanisms, home assessments, and appliance recycling.	PY18-22	242,020	2,790,254	50.0	17%	19%
	Residential Home Energy Reports	Residential	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations.	PY18-22	142,549	570,196	32.2	10%	12%
	Totals for Residential Sector				384,569	3,360,450	82.2	~~26~~ 27 %	~~31~~ 31 %
Residential Program	Low-Income Energy Efficiency	Low-Income	The program goal is to improve the energy efficiency and peak demand reduction for low-income customers to help make their homes more affordable.	PY18-22	~~72,200~~ 63,598	~~491,644~~ 426,338	~~12.0~~ 10.1	~~64~~ 54 %	~~54~~ 54 %
	Low-Income Home Energy Reports	Low-Income	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized	PY18-22	5,374	21,496	1.1	0%	0%

			energy-usage information, personal and neighborhood comparisons, and energy savings recommendations.						
	Totals for Low-Income Sector				~~77,574~~ <u>68,972</u>	~~513,140~~ <u>447,834</u>	~~13.4~~ <u>11.1</u>	~~75%~~ <u>64%</u>	
SCI Programs	Non-Residential Energy Efficiency	Small Commercial	The program offers a comprehensive and cross-cutting array of opportunities so small commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	~~442,780~~ <u>427,253</u>	~~6,313,633~~ <u>6,081,008</u>	~~70.3~~ <u>68.5</u>	~~3029%~~ <u>2726%</u>	
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.	PY18-22	755	6,737	0.1	0%	0%
	~~Low-Income EE~~ <u>Low-Income Energy Efficiency</u>	Multifamily ²¹	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-income multifamily buildings.	PY18-22	~~9,096~~ <u>8,976</u>	~~79,035~~ <u>87,044</u>	~~1.3~~ <u>1.6</u>	1%	~~01%~~ <u>01%</u>
	Totals for SCI Sector				~~442,582~~ <u>436,984</u>	~~6,310,664~~ <u>6,174,790</u>	70.3	~~452.631~~ <u>30%</u>	~~6,399,405~~ <u>27%</u>
LCI Programs²¹	Non-Residential Energy Efficiency	Large Commercial	The program offers a comprehensive and cross-cutting array of opportunities so large commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	~~533,450~~ <u>549,355</u>	~~7,691,639~~ <u>7,930,365</u>	~~96.2~~ <u>99.1</u>	~~3738%~~ <u>3637%</u>	
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand	PY18-22	755	6,737	0.1	0%	0%

²¹ Costs for master-metered projects are recovered from the Small and Large C&I sectors. Low-income master-metered buildings are recovered from of the Small and Large C&I sectors and are counted towards the low income carveout target.

			reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.						
	Low-Income EE Low-Income Energy Efficiency	Multifamily ²²	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-income multifamily buildings.	PY18-22	9,096,897	79,035,87,044	1.31.6	1%	01%
	Totals for LCI Sector				533,648,559,086	7,694,608,024,146	96.2100.9	543,301-39%	7,777,411-38%
	Totals for Plan				1,458,0761.449.612	18,050,40618.007.220	264.5	100%	1,458,076100%

¹ Municipal Lighting measures are included in both the SCI and the LCI sectors within the Non-Residential Program.

2.2 Plan Data: Costs, Cost-Effectiveness, and Savings by Program, Sector, and Portfolio

Various sections of this report contain the following data tables, as required by the PUC's Plan V template:

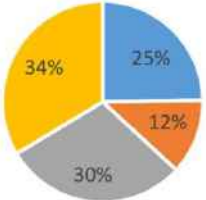
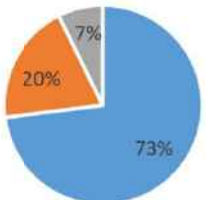
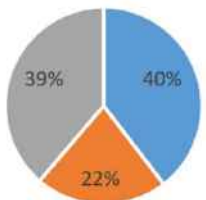
- Section 1.3: Table 1. Portfolio Summary of Lifetime Costs and Benefits of Energy Efficiency Measures
- Section 1.3: Table 2. Portfolio Summary of Energy and Demand Savings
- Section 1.3: Table 3. Summary of Portfolio Energy and Demand Savings
- Section 1.3: Table 4. Summary of Seasonal Demand Savings
- Section 1.3: Table 5. Summary of Portfolio Costs. Summary of Portfolio Costs
- Section 2.1: Table 6. Program Summaries

²² Id.

2.3 Budget and Parity Analysis

Table 7 presents the Budget and Parity Analysis, illustrating how program expenditures compare with PECO's total annual revenue and MWh sales by customer sector. Calculations are based on calendar year 2024 data, inclusive of collections for Electric Generation Suppliers, and include both bundled and delivery-only sales.

Table 7. Budget and Parity Analysis Summary

Residential Sector (<i>exclusive of Low-Income</i>)	~~\$109,815,107~~ <u>\$105,758,397</u>	~~26~~ <u>25</u> %	73%	40%
Residential Low-Income Sub-Sector	~~\$61,436,925~~ <u>\$51,769,033</u>	~~14~~ <u>12</u> %		
Residential Subtotal	~~\$171,252,032~~ <u>\$157,527,430</u>	~~40~~ <u>37</u> %	73%	40%
SCI Sector	~~\$123,627,960~~ <u>\$126,135,594</u>	~~29~~ <u>30</u> %	~~48~~ <u>20</u> %	22%
LCI Sector	~~\$132,505,839~~ <u>\$143,722,804</u>	~~31~~ <u>34</u> %	~~8~~ <u>7</u> %	39%
Non-Residential Subtotal	~~\$256,133,799~~ <u>\$269,858,398</u>	~~60~~ <u>63</u> %	27%	60%
EDC TOTAL	~~\$427,385,831~~ <u>\$427,385,830</u>	100%	100%	100%
EDC TOTAL as Share of Budget Ceiling	100.0%			
% Budget by Customer Sector  ■ Residential Sector (<i>exclusive of Low-Income</i>) ■ Residential Low Income Sub-Sector ■ Small C&I Sector ■ Large C&I Sector % Revenue by Customer Sector  ■ Residential Subtotal ■ Small C&I Sector ■ Large C&I Sector % MWh Sales by Customer Sector  ■ Residential Subtotal ■ Small C&I Sector ■ Large C&I Sector				

3. Program Descriptions

The objective of this section is to provide detailed descriptions of each proposed program, explain PECO's selection process, and demonstrate how these programs form balanced and integrated portfolios. Section 3.1 outlines the criteria and processes used for program selection. Section 3.2 focuses on residential sector programs, including Section 3.2.1, which addresses low-income sub-sector initiatives. Sections 3.3 and 3.4 detail offerings in the combined non-residential program for SCI and LCI customers, while Section 3.5 describes PECO's strategy for engaging and integrating the government/nonprofit/institutional sector (GNI) into its non-residential Act 129 program initiatives.

3.1 Discussion of Criteria and Process Used for Selection of Programs

This section contains portfolio objectives and metrics, the process for program development, how measures were included, and a discussion of the meaning of comprehensive programs in the context of the Plan.

3.1.1 Portfolio Objectives and Metrics that Define Program Success

PECO's portfolio objectives are to achieve the requirements set forth in the Phase V Final Order. The Plan will be implemented by delivering the required energy savings and peak demand reductions in a cost-effective manner, on pace, and with a reasonable mix of cost-effective technologies. Figure 2 outlines PECO's Phase V budget and savings compliance targets. These metrics will define Phase V's success.

Figure 2. PECO's Phase V Budget and Savings Targets

Overall Budget	Regulatory Energy Savings Target	Energy Savings Carve-Outs	Pace of Savings	Peak Demand Reduction Target
The total Phase V budget is not to exceed \$427.4 million. The total annual average budget will be \$85.5 million.	The Phase V MWh savings target is 1,111,685 MWh over 5 years, averaging 222,337 MWh/year (2.8% of 2009/2010 annual sales).	Low-income carve-out as defined in the Phase V Final Implementation Order ($\leq 150\%$ FPL): • 74,456 MWh for Phase V • 14,891 average annual MWh/year	The portfolio must plan to achieve at least 15% of MWh savings target each year (166,753 MWh).	The Phase V peak demand target is 194.8 MW. The portfolio must reduce at least 15% of this target each year and achieve at least 75% of the portfolio compliance target (146.1 MW) each season.

PECO will monitor portfolio performance and make mid-course corrections as necessary to:

- Generate energy savings through streamlined processes that make participation easy for customers and market actors;
- Monitor the marketplace for additional measures and solutions that could be offered in the future;
- Maintain a comprehensive set of energy solution offerings across all end uses to all customers;
- Present a comprehensive and appropriate set of participation channels (e.g., retail versus contractor) through which customers can access energy efficiency solutions; and
- Reallocate program funds among components based on market participant response.

3.1.2 Process for Program Development

PECO's detailed and collaborative program development process resulted in a Phase V Plan with three programs (Residential, ¹⁸²³ Non-Residential, and HER ¹⁹²⁴). PECO took the following steps to develop the program structure:

- **Reviewed Phase IV Learnings:** PECO analyzed evaluation findings, research reports, and stakeholder feedback from Phase IV to identify opportunities for improvement and strategies to enhance performance in Phase V.
- **Assessed Market Potential:** PECO reviewed the SWE Phase V Potential Studies to determine achievable savings by customers segment and measure category to inform an innovative and achievable program design.
- **Evaluated Potential Program Structures:** PECO identified multiple program and subcomponent designed structures and evaluated them against design principles focused on flexibility, customer accessibility and experience, and operational efficiency.
- **Prioritized and Selected Preferred EE Design Elements:** For the non-behavioral programs, PECO developed preferred design elements for an ideal program structure and selected the program structure that met most of the design elements, resulting in a program structure that:
 - ¹⁸²³ Provides a single CSP for the residential customer program and a single CSP for the non-residential program
 - ¹⁸²³ Allows for flexibility to respond to market demands for measures and services
 - ¹⁸²³ Offers consistent measures across residential and non-residential programs and provides mechanisms for customers to pursue comprehensive energy efficiency upgrades
 - ¹⁸²³ Provides program-specific residential and non-residential call centers for individualized customer support
- **Defined Program Components:** PECO identified program components based on historical programs in PECO's territory, market research, best practices from other

¹⁸²³ The Residential program includes program components for both market-rate and low-income customers.

¹⁹²⁴ The HER program includes HERs for market-rate and low-income customers.

jurisdictions, and market factors in PECO's territory. Through the competitive RFP process, CSPs were responsible for developing comprehensive implementation strategies aligned with the scope of work and regulatory requirements.

This comprehensive approach reflects PECO's commitment to continuous improvement, stakeholder engagement, and market-driven design to allow Phase V programs to deliver energy savings and enhance customer experience.

3.1.3 How Energy Efficiency, Combined Heat and Power, Renewables, Load-Shifting, and Other Measures Were Included in the Portfolio

Per Section 1.2, bidding CSPs recommended program designs based on PECO's program design criteria and chose measures to include in the programs. CSPs used a data-driven approach and model to estimate the measures, participation levels, and incentive ranges using PECO's design workbook provided as part of the RFP process. Data inputs included the following:

- 2026 TRM;
- SWE IMC Database;
- Phase IV Act 129 Findings;
- Measure Modeling Efforts; and
- Benchmarking with Other Utility Energy Efficiency Portfolios.

Phase V places greater emphasis on peak demand reductions through energy efficiency and daily load shifting ("DLS"). PECO's program design reflects that DLS has significantly higher potential in the residential sector compared with non-residential. As DLS is a new offering for full-scale implementation, PECO will include all residential DLS measures within a dedicated DLS program component to isolate and monitor budgets, savings, and participation. For non-residential programs, PECO will implement DLS measures within the building optimization program component. These measures will be implemented alongside energy efficiency measures. Refer to Section 3.4 for additional details.

In the residential program, solar measures will be included in the Rebates program component alongside other energy efficiency offerings; refer to Section 3.2 for additional details. In the non-residential program, CHP and solar measures will be implemented through the Distributed Energy Resources program component; refer to Section 3.4 for additional details.

3.1.4 Fuel Switching Measures Proposed Minimum Standard and Justification for Threshold to Receive Program Support

As part of PECO's Act 129 initiative, the non-residential program will incorporate CHP projects. In alignment with the 2026 TRM, this measure will be assessed using a custom baseline informed by site-specific historical trend data.

3.1.5 PECO Program Delivery Alignment with Non-Act 129 Programs

Please reference Section 1.7 for details surrounding coordination with non-Act 129 programs.

3.1.6 Front-of-the Meter Measures Included and Expected Contribution

The Phase V portfolio does not include front-of-the-meter measures.

3.1.7 How PECO Defines Comprehensive in the Context of Plan Design and Delivery

PECO's measure mix aims to prioritize comprehensive measures. PECO will use the Commission's definition of a comprehensive measure as outlined in the Table 8 Addendum tab of the template tables. This includes measures that are defined as comprehensive on their own, such as heat pumps and insulation, as well as measures that are considered comprehensive only when paired with the installation of another comprehensive measure.

Residential Program: The comprehensive components in the Residential program include the Market Rate Single Family and Income-Eligible Single Family components.

In addition to offering comprehensive measures, as defined by the Commission, the Residential program is designed to have a comprehensive approach to implementation. The Residential program's comprehensive implementation approach includes delivering components that address a broader customer journey and the whole home by layering multiple measures, incentive streams, and customer support channels to maximize verified savings, affordability, and equity.

Non-Residential Program: The Existing Buildings component is the comprehensive component of the Non-Residential program.

In addition to offering comprehensive measures, the Non-Residential program is designed to have a comprehensive approach to implementation. The Non-Residential program's comprehensive approach includes a diverse mix of measures and services across multiple components, enabling customers to pursue energy efficiency through various pathways tailored to their needs. This approach integrates multiple components to facilitate broad accessibility to allow customers to claim incentives on deep energy savings.

3.1.8 TOU Contributions to Portfolio

PECO recognizes the potential of TOU rates to deliver measurable load shifting benefits and contribute to overall portfolio savings. Consistent with the Commission's guidance, PECO will not claim inherent load shifting benefits from TOU enrollment alone. Instead, PECO will leverage its EE&C Plan to drive customer adoption and maximize impacts through targeted engagement strategies including:

- **Customer Education:** Develop and deploy educational campaigns that explain TOU rate structures, benefits, and practical strategies for shifting usage to lower-cost periods. These campaigns will utilize multiple channels, including digital platforms, bill inserts, and community outreach.
- **Behavioral Programming:** Incorporate behavioral demand response elements that encourage customers to adjust consumption patterns in response to TOU signals. This

may include personalized usage reports, alerts, and tips tailored to individual consumption profiles.

- **Incentives:** Offer financial incentives to accelerate TOU enrollment and encourage sustained participation. Incentives may include enrollment bonuses, bill credits, or rebates tied to verified load shifting performance.

By combining education, behavioral programming, and incentives, PECO aims to bolster the load impacts of TOU adoption and help these measures contribute meaningfully to Phase V objectives. PECO will track enrollment, engagement, and performance metrics to evaluate the effectiveness of these strategies and adjust program delivery as needed.

3.2 Residential Sector

The residential sector, including both market rate and low-income customer populations, is served by two programs: the Residential program and the Residential HER program. Both programs have subprograms dedicated to serving low-income customers. Market rate customers are served through the Residential program and Residential HER program (described in this section) and low-income customers are served through the Residential Low-Income subprogram and the Residential Low-Income HER subprogram (described in Section 3.2.1).

Residential Program (2026-2031)

Objective

The Residential program objective is to increase energy efficiency in single family homes and individual units and common areas of multifamily buildings. PECO will meet this objective by:

- Providing incentives for customer purchases of efficient lighting, appliances, HVAC upgrades, solar, energy-savings devices, and other energy-savings technologies.
- Removing old, inefficient refrigerators, freezers, dehumidifiers, and room AC units from the PECO service area through responsible recycling.
- Driving the construction of energy-efficient homes and demonstrate their value to builders and homebuyers.
- Delivering no-cost and low-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.
- Supporting DLS and peak demand reduction by encouraging adoption of smart devices.

Target Market

The eligible population and target market for the Residential program includes existing residential single family, or new construction, and multifamily customers. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers:

- **Residential Single Family:** Includes PECO residential electric customers that are individually metered and do not qualify as low-income. Due to the long history of PECO's service territory, the residential housing stock is diverse in age and structure.

- **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls. The CSP will provide owners with clear return-on-investment messaging and guidance through financing or rebate enrollment.
- **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval for comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.
- **Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential program offers residential customers in single family and multifamily buildings opportunities to save energy across all of their electric end-uses. This customer-friendly approach will enable participants to make comprehensive energy efficiency upgrades to a variety of equipment types while working with a single PECO program, leading to deeper retrofits. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7.

The following section describes program components.

Program Components

The Residential program contains the following market-rate program components:²⁰²⁵

- **In-Home Assessments:** Offers in-home or virtual assessments that include a home inspection, energy usage analysis, direct-install measures, and an energy education session, [including, when finalized, information on the energy efficiency benefits of heat pumps](#), followed by a custom report to identify larger energy efficiency opportunities (e.g., insulation and air sealing), and encourage participation in other

²⁰²⁵ Residential Low-Income subprogram components are discussed in Section 3.2.1

Residential programs, including programs not managed by PECO, when the customer is believed to qualify. BPI-certified Energy Advisors will perform these assessments when possible. Units in individually metered multifamily buildings are served through this component as well.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups, [if a suitable vendor is obtained to provide pick up services](#). Encourages participation in other programs.
- **Rebates:** Provides rebates for energy efficient measures through several channels, including downstream applications; trade ally and distributor networks that apply on behalf of customers or offer incentives directly on invoices; and point-of-purchase discounts at retail locations.
- **Online Marketplace:** Provides a one-stop shopping experience for instant rebates on efficient products with the opportunity to increase customer awareness of products and components.
- **New Construction:** Promotes building homes that are more comfortable, durable, and energy efficient than those built to code. Home Energy Rating System (HERS) raters collaborate with builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, electric vehicle [EV] managed charging, battery storage, water heaters) and behavioral measures, [which may include TOU rates for eligible customers](#).
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote other Act 129 program offerings to customers through a variety of methods including:

- Sharing program information in new mover kits
- Promoting other offerings in emails, web content, and Home Energy Reports
- Sharing information about other Act 129 offerings during in-home energy assessments
- Providing customers with informational materials during appliances recycling drop-off events

Implementation Strategy

The Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

- **In-Home Assessments:** The CSP will offer two appointment types for customers:
 - **Energy Assessment** will provide customers with an in-depth walkthrough of their home, recommendations for whole-house improvements, and recommendations for other ways to save within the PECO portfolio of energy efficiency components and installation of energy savings products.
 - **Energy Assessment Plus** will be performed in accordance with BPI standards. Comprehensive audits will provide the same services as the Energy Assessment appointment and add depth and detail by using a variety of diagnostic equipment and inspection techniques such as building tightness testing and infrared thermography. Customers will receive more specific information to help them move forward with recommendations, including any applicable available incentives. At the completion of the assessment, customers will receive a detailed summary report outlining findings, recommended improvements, and available program offerings to help guide next steps.
- **Appliance Recycling:** The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners, and dehumidifiers. An additional option will be available for customers to drop off regular household sized refrigerators and freezers at a designated location.
- **Rebates:** Rebates are available for eligible PECO customers on eligible HVAC equipment, appliances, water heating, [solar systems](#), and other energy saving measures. Customers may apply for rebates, or HVAC [and solar](#) contractors may apply on a customer's behalf. The component also includes an instant markdown channel designed to deliver immediate savings to customers at the point of sale.
- **Online Marketplace:** A convenient platform where customers can purchase energy-efficiency products, including smart thermostats, air purifiers, dehumidifiers, and advanced power strips. The marketplace will offer exclusive seasonal manufacturer discounts and instant PECO rebates, making it easier for customers to upgrade to more energy efficient equipment.
- **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters.
- **DLS:** The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:
 - **Managed EV Charging** to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.
 - **Thermostat Optimization** to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.
 - **A Bring-Your-Own-Battery (BYOB)** offering that will discharge batteries to lower grid demand during peak periods. The offerings will enroll existing residential battery

systems to leverage existing infrastructure rather than providing incentives for new battery installation.

- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

The Residential program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, incentives, and program resource allocation) to meet the portfolio level targets.

One risk is the transition from Phase IV to Phase V. Part of this risk will be mitigated by the continuity in implementation CSP from Phase IV to Phase V. The CSP has extensive regulatory and market knowledge in Pennsylvania and prior extensive experience with PECO's energy efficiency programs.

An additional risk is market factors that are not controlled by PECO including changing federal and state guidelines and regulations, such as possible changes to the federal ENERGY STAR® program that is currently used to prescribe equipment eligibility in the 2026 TRM. If the ENERGY STAR program were to no longer exist, PECO would consider alternative options such as equipment verification through databases like DOE's Compliance Certification and Management System (CCMS). ~~As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.~~

Another potential risk to program design stems from external economic factors that could significantly increase incremental costs, such as substantial tariff impacts or prolonged periods of high inflation. Should these challenges arise and create prohibitive conditions during Phase V, PECO will proactively collaborate with stakeholders and the Commission to identify solutions.

As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential program are projected to incur costs of \$270,251,892 for Phase V after PECO incentives. These costs are calculated by subtracting incentives from incremental costs, representing the anticipated direct expenses for participating customers.

Ramp-Up Strategy

Minimal ramp-up will be needed for the In-Home Assessments, Rebates, Marketplace, Appliance Recycling, Multifamily, and New Construction components because similar components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received potential load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential program components.

- **In-Home Assessments:** Personalized email outreach; new mover kits; social media; targeted digital ads; community engagement through homeowner associations, newsletters, and events.
- **Appliance Recycling:** Emails; bill inserts; social media; cross-promotions with municipal recycling events.
- **Rebates:** In-store point-of-purchase signage; direct outreach from contractors; targeted emails; digital ads; social media.
- **Online Marketplace:** Website banners; digital ads; emails; social media.
- **New Construction:** Direct builder [and rater](#) outreach; education events and partnerships with trusted associations (i.e., Home Building Associations, housing authorities, community developers); technical assistance, case studies, and collaboration with manufacturers.
- **DLS:** Co-branded marketing (i.e., thermostats ~~and~~, EV [chargers and](#) batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; newsletters.
- **Multifamily:** Outreach to property managers and tenants through case studies, testimonials, and industry events; digital advertising.

Eligible Measures and Incentive Strategy

The measure mix is listed in Table 8 and includes a comprehensive mix of end-use technologies such as lighting, HVAC, appliances, shell, water heating, and plug loads. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 8. Residential Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
ENERGY STAR Refrigerators	per refrigerator	No	Yes, if paired with other comprehensive	Phase V TRM	\$128.41	14	\$0.00 - \$128.41
ENERGY STAR Clothes Washers	per washer	No	Yes, if paired with other comprehensive	Phase V TRM	\$35.72	14	\$0.00 - \$35.72
ENERGY STAR Clothes Dryers	per dryer	No	Yes, if paired with other comprehensive	Phase V TRM	\$206.34	14	\$0.00 - \$206.34
ENERGY STAR Dehumidifiers	per dehumidifier	No	Yes, if paired with other comprehensive	Phase V TRM	\$0.00	12	\$0.00 - \$25.00
Photovoltaic (PV) Solar Generation	per PV array	No	Yes, if paired with other comprehensive	Phase V TRM	\$15,232.00	15	\$0.00 - \$15,232.00
ENERGY STAR Freezers	per freezer	No	Yes, if paired with other comprehensive	Phase V TRM	\$38.93	11	\$0.00 - \$38.93
ENERGY STAR Coolers	per cooler	No	Yes, if paired with other comprehensive	Phase V TRM	\$281.84	14	\$0.00 - \$281.84
ENERGY STAR Dishwashers	per dishwasher	No	Yes, if paired with other comprehensive	Phase V TRM	\$79.45	10	\$0.00 - \$79.45
WH > 10% UBC \$0.30/kWh	per home	No	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
WH > 10% UBC HPWH \$0.60/kWh	per home	No	Yes	Phase V TRM	\$3,053.95	15	\$0.00 - \$3,053.95
HVAC Systems: PTAC	per PTAC	No	Yes	Phase V TRM	\$1,571.00	15	\$0.00 - \$1,571.00
HVAC Systems: PTHP	per PTHP	No	Yes	Phase V TRM	\$2,094.00	15	\$0.00 - \$2,094.00

²⁶ PECO applied the definition for comprehensive measure from Table 8 Addendum from the Final Act 129 Phase V EE&C Plan Template Tables Workbook, available at: [Energy Efficiency and Conservation \(EE&C\) Program | PA PUC and specifically here: 1894161.xlsx](#)

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
High Efficiency Equipment: ASHP	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: CAC	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	No	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
Duct Sealing & Duct Insulation	per home	No	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$280.65
Heat Pump Water Heaters	per water heater	No	Yes	Phase V TRM	\$1,684.76	10	\$0.00 - \$1,684.76
Residential Air Sealing	per home	No	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	No	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$857.72
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	No	Yes	Phase V TRM	\$300.00	15	\$0.00 - \$300.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	No	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$203.21
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJL Insulation	per home	No	Yes	Phase V TRM	\$500.00	15	\$0.00 - \$500.00
Basement or Crawl Space Wall Insulation	per home	No	Yes	Phase V TRM	\$155.63	15	\$0.00 - \$155.63
ENERGY STAR Windows	per window area	No	Yes	Phase V TRM	\$952.20	15	\$0.00 - \$952.20
Room Air Conditioners	per room A/C	No	Yes	Phase V TRM	\$95.08	9	\$0.00 - \$95.08
Window Heat Pump	per window heat pump	No	Yes	Phase V TRM	\$2,574.50	9	\$0.00 - \$2,574.50
High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP	per unit	No	Yes	Phase V TRM	\$2,192.37	15	\$0.00 - \$2,192.37
Solar Water Heaters	per water heater	No	Yes	Phase V TRM	\$1,111.33	15	\$0.00 - \$1,111.33
Dehumidifier Retirement	per dehumidifier	No	~~Yes~~ No	Phase V TRM	\$10.00	4	\$0.00 - \$10.00
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	No	~~Yes~~ No	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling	per refrigerator	No	~~Yes~~ No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
with and without Replacement							
Room AC (RAC) Retirement	per room A/C	No	~~Yes~~ No	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	No	~~Yes~~ No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	No	~~Yes~~ No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
WH > 10% UBC \$0.30/kWh	per home	No	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
WH > 10% UBC HPWH - \$0.60/kWh	per home	No	Yes	Phase V TRM	\$3,053.95	15	\$0.00 - \$3,053.95
ENERGY STAR Certified Connected Thermostats	per thermostat	No	~~Yes~~ No	Phase V TRM	\$168.42	9	\$0.00 - \$168.42
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	No	~~Yes~~ No	Phase V TRM	\$4.40	2	\$0.00 - \$4.40
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	No	~~Yes~~ No	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	No	~~Yes~~ No	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	No	~~Yes~~ No	Phase V TRM	~~\$3.25~~ 1.63	8	\$0.00 - \$3.25
Low-Flow Faucet Aerators: Direct install	per aerator	No	~~Yes~~ No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	No	~~Yes~~ No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	No	~~Yes~~ No	Phase V TRM	~~\$42.00~~ 41.75	15	\$0.00 - \$42.00
Water Heater Tank Wrap	per tank	No	~~Yes~~ No	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	No	~~Yes~~ No	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	No	~~Yes~~ No	Phase V TRM	~~\$60.00~~ 40.07	5	\$0.00 - \$60.00
ENERGY STAR Air Purifiers - Direct Install LI & MF	per air purifier	No	Yes	Phase V TRM	\$300.00	9	\$0.00 - \$300.00

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
LED Exit Signs	per sign	No	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	No	No	Phase V TRM	~~\$80.00~~ <u>27.00</u>	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	No	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	No	No	Phase V TRM	~~\$120.00~~ <u>97.00</u>	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	No	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00
Lighting: Permanent Fixture Removal	per fixture	No	No	Phase V TRM	~~\$60.00~~ <u>25.00</u>	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	No	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	No	No	Phase V TRM	~~\$150.00~~ <u>52.00</u>	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	No	No	Phase V TRM	~~\$250.00~~ <u>76.00</u>	15	\$0.00 - \$250.00
Occupancy Sensor	per sensor	No	No	Phase V TRM	\$55.00	8	\$0.00 - \$55.00
HVAC Systems: PTAC Customer Education: Adjust Thermostat	per <u>PTAC home</u>	No	~~Yes~~ <u>No</u>	Phase V TRM	~~\$1,600.00~~ <u>20.00</u>	~~15~~ <u>1</u>	\$0.00 - ~~\$1,600.00~~ <u>20.00</u>
HVAC Systems: PTHP Customer Education: Shorter Showers	per <u>PTHP home</u>	No	~~Yes~~ <u>No</u>	Phase V TRM	~~\$2,100.00~~ <u>15.00</u>	~~15~~ <u>1</u>	\$0.00 - ~~\$2,100.00~~ <u>15.00</u>
Customer Education: Wash Laundry in Cold Water	<u>per home</u>	<u>No</u>	<u>No</u>	<u>Phase V TRM</u>	<u>\$15.00</u>	<u>1</u>	<u>\$0.00 - \$15.00</u>
Advanced Power Strips: Kit	per advanced power strip	No	~~Yes~~ <u>No</u>	Phase V TRM	\$40.07	5	\$0.00 - \$40.07
Connected Smart Thermostat	per unit	No	No	Phase V TRM	~~\$23.06~~ <u>17.30</u>	1	\$0.00 - \$23.06
Electric Vehicle Managed Charging (Actively Managed)	per unit	No	No	Phase V TRM	~~\$144.00~~ <u>108.00</u>	1	\$0.00 - \$144.00
Behind the Meter Battery Storage (Bring Your Own)	per unit	No	No	Phase V TRM	~~\$858.00~~ <u>643.50</u>	1	\$0.00 - \$858.00
Water Heater Pipe Insulation	per water heater	No	~~Yes~~ <u>No</u>	Phase V TRM	\$59.80	11	\$0.00 - \$59.80
Smart Water Heater Controls	per water heater controller	No	~~Yes~~ <u>No</u>	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	No	~~Yes~~ <u>No</u>	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Advanced Power Strips: Tier 1	per advanced power strip	No	~~Yes~~ <u>No</u>	Phase V TRM	\$30.00	5	\$0.00 - \$30.00
Advanced Power Strips: Tier 2	per advanced power strip	No	~~Yes~~ <u>No</u>	Phase V TRM	\$75.00	5	\$0.00 - \$75.00
ENERGY STAR Certified	per thermostat	No	~~Yes~~ <u>No</u>	Phase V TRM	~~\$190.00~~ <u>168.42</u>	9	\$0.00 - \$190.00

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Connected Thermostats: ASHP							
ENERGY STAR Certified Connected Thermostats: CAC-Only	per thermostat	No	~~Yes~~ No	Phase V TRM	~~\$190.00~~ 168.42	9	\$0.00 - \$190.00
ENERGY STAR Air Purifiers	per air purifier	No	~~Yes~~ No	Phase V TRM	~~\$168.75~~ 66.03	9	\$0.00 - \$168.75
High Efficiency Equipment: ASHP	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: CAC	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	No	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
ECM Circulation Fans	per fan	No	~~Yes~~ No	Phase V TRM	\$352.79	5	\$0.00 - \$352.79
Air Conditioner & Heat Pump Maintenance	per unit	No	~~Yes~~ No	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
Duct Sealing & Duct Insulation	per home	No	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$280.65
Furnace Maintenance	per furnace	No	~~Yes~~ No	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
ENERGY STAR Bathroom Exhaust Fan	per exhaust fan unit	No	~~Yes~~ No	Phase V TRM	\$208.00	15	\$0.00 - \$208.00
Heat Pump Water Heaters	per water heater	No	Yes	Phase V TRM	\$920.44	10	\$0.00 - \$920.44
Residential Air Sealing	per home	No	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	No	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$857.72
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	No	Yes	Phase V TRM	\$300.00	15	\$0.00 - \$300.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	No	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$203.21

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Ceiling/Attic, Wall, Floor and Rim-Joist Insulation: RJI Insulation	per home	No	Yes	Phase-V TRM	\$500.00	15	\$0.00 – \$500.00
Basement or Crawl Space Wall Insulation	per home	No	Yes	Phase-V TRM	\$155.63	15	\$0.00 – \$155.63
ENERGY STAR Windows	per window area	No	Yes	Phase-V TRM	\$952.20	15	\$0.00 – \$952.20
Water Heater Pipe Insulation: Kit	per water heater	No	YesNo	Phase V TRM	\$3.00	11	\$0.00 - \$3.00
Room Air Conditioners	per room A/C	No	Yes	Phase-V TRM	\$95.08	9	\$0.00 – \$95.08
Window Heat Pump	per window heat pump	No	Yes	Phase-V TRM	\$2,574.50	9	\$0.00 – \$2,574.50
ENERGY STAR Refrigerators	per refrigerator	No	Yes	Phase-V TRM	\$128.41	14	\$0.00 – \$128.41
ENERGY STAR Clothes Washers	per washer	No	Yes	Phase-V TRM	\$35.72	14	\$0.00 – \$35.72
ENERGY STAR Clothes Dryers	per dryer	No	Yes	Phase-V TRM	\$206.34	14	\$0.00 – \$206.34
ENERGY STAR Dehumidifiers	per dehumidifier	No	Yes	Phase-V TRM	\$25.00	12	\$0.00 – \$25.00
Photovoltaic (PV) Solar-Generation	per PV array	No	Yes	Phase-V TRM	\$15,232.00	15	\$0.00 – \$15,232.00
Water Heater Pipe Insulation - Instant Markdown	per water heater	No	YesNo	Phase V TRM	\$6.00	11	\$0.00 - \$6.00
Residential Occupancy Sensors	per sensor	No	YesNo	Phase V TRM	\$65.90	8	\$0.00 - \$65.90
Holiday Lights	per one strand of holiday lights	No	YesNo	Phase V TRM	\$0.67	10	\$0.00 - \$0.67
High-Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP	per unit	No	Yes	Phase-V TRM	\$2,192.37	15	\$0.00 – \$2,192.37
GSHP Desuperheaters	per desuperheater	No	YesNo	Phase V TRM	\$2,260.05	15	\$0.00 - \$2,260.05
Air Handler Filter Whistles	per filter whistle	No	YesNo	Phase V TRM	\$5.19	5	\$0.00 - \$5.19
Solar Water Heaters	per water heater	No	Yes	Phase-V TRM	\$1,111.33	15	\$0.00 – \$1,111.33
Drain Water Heat Recovery Units	per unit	No	YesNo	Phase V TRM	\$734.58	15	\$0.00 - \$734.58
ENERGY STAR Freezers	per freezer	No	Yes	Phase-V TRM	\$38.93	11	\$0.00 – \$38.93

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3,26}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
~~ENERGY STAR Coolers~~	~~per-cooler~~	No	Yes	~~Phase V TRM~~	~~\$281.84~~	~~14~~	~~\$0.00 - \$281.84~~
Cooler Recycling with and without Replacement	per cooler	No	~~Yes~~ No	Phase V TRM	\$281.84	9	\$0.00 - \$281.84
Residential Induction Cooktop	per induction cooktop	No	~~Yes~~ No	Phase V TRM	\$1,087.38	15	\$0.00 - \$1,087.38
~~ENERGY STAR Dishwashers~~	~~per dishwasher~~	No	Yes	~~Phase V TRM~~	~~\$79.45~~	~~10~~	~~\$0.00 - \$79.45~~
ENERGY STAR Ceiling Fans	per ceiling fan	No	~~Yes~~ No	Phase V TRM	\$252.74	10	\$0.00 - \$252.74
ENERGY STAR Pool Pumps	per pool pump	No	~~Yes~~ No	Phase V TRM	\$145.38	10	\$0.00 - \$145.38
Single Speed Pool Pump Replacement	per VFD pool pump	No	~~Yes~~ No	Phase V TRM	\$986.77	3.3	\$0.00 - \$986.77
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to include in the program and offer an incentive of up to the incremental measure costs ^{24,27} for any measure that is not listed in Table 8 but identified in the TRM or approved as an interim measure protocol.

^{24,27} The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here Total Resource Cost Test | PA PUC

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted. Any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

Assumed EM&V

The Residential program's proposed evaluation methodology and data collection are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO will follow the SWE's Evaluation Framework, utilize a SWE-approved Phase V evaluation plan, and utilize an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program and participation trends
 - Energy savings and peak demand reductions associated with installed efficient equipment or removed equipment
 - Program implementation costs and program cost-effectiveness
- Data for evaluating the program will come from some of the following sources:
- Tracking system data
 - Engineering or TRM estimates of measure savings
 - Follow-up surveys of customers, retailers, trade allies, and service providers who participate in the program
 - Program implementer and PECO staff surveys or interviews

- Evaluation of billing data
- Local weather data

Program impacts will be determined using a variety of data sources and tested techniques. These strategies may include:

- Field and phone verification, review of program records and incentive applications
- Project reviews referencing per-unit deemed or default energy savings
- Billing analysis
- Installation follow-up phone interviews with program participants to identify: Rebated measures installed and persistence (e.g., are the measures still installed?), and other changes to the business that affect energy usage, such as changes in occupancy or changes in building size
- Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response includes the following strategies:
 - Assess marketing and promotional efforts
 - Monitor contractor data-tracking system and implementation procedures to confirm that the program is being implemented as designed
 - Interview utility staff, contractors, equipment vendors, and customers
 - Survey program participants
 - Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the Residential program through a CSP. PECO will confirm that major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six full-time equivalent (FTE) staff dedicated to the residential sector.

Savings Projections

Table 9. Residential Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Dehumidifier Retirement	2.4.12	Energy Savings (MWh) ²	955	979	1,028	1,077	857	4,897
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	956	980	1,029	1,078	857	4,900
Low-Capacity Refrigerator / Freezer Recycling without Replacement	2.4.4	Energy Savings (MWh) ²	85	87	92	96	78	438
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	286	293	308	322	261	1,470
Refrigerator / Freezer Recycling with and without Replacement	2.4.3	Energy Savings (MWh) ²	19	20	20	22	17	98
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1 0.0
		Projected Participation ³	24	25	26	28	22	125
Room AC (RAC) Retirement	2.2.8	Energy Savings (MWh) ²	51	52	54	57	45	260
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	390	400	420	440	350	2,000
Low-Flow Faucet Aerators: Kit	2.3.6	Energy Savings (MWh) ²	~~459,423~~	~~459,445~~	~~459,481~~	~~459,516~~	~~459,430~~	2,295
		Summer Demand Reduction (MW)	~~0.1 0.0~~	0.1	0.1	0.1	~~0.1 0.0~~	0.3
		Winter Demand Reduction (MW)	0.1	~~0.2 0.1~~	~~0.2 0.1~~	~~0.2 0.1~~	~~0.2 0.1~~	~~1.0 0.4~~
		Projected Participation ³	~~29,162~~ ~~26,881~~	~~29,162~~ ~~28,249~~	~~29,162~~ ~~30,529~~	~~29,162~~ ~~32,809~~	~~29,162~~ ~~27,337~~	~~145,810~~ ~~145,805~~
Low-Flow Showerheads: Kit	2.3.7	Energy Savings (MWh) ²	~~1,022,851~~	~~1,022,953~~	~~1,022,1,124~~	~~1,022,1,295~~	~~1,022,885~~	5,108
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.2	~~0.3 0.2~~	~~0.3 0.2~~	~~0.3 0.2~~	~~0.3 0.2~~	~~1.3 1.0~~
		Projected Participation ³	~~60,662~~	~~60,662~~	~~60,662~~	~~60,662~~	~~60,662~~	~~303,310~~

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
			<u>50,506</u>	<u>56,599</u>	<u>66,754</u>	<u>76,909</u>	<u>52,537</u>	<u>303,305</u>
WH > 10% UBC \$0.30/kWh	2.7.1	Energy Savings (MWh) ²	3,200	3,170	3,192	3,216	3,246	<u>16,024</u>
		Summer Demand Reduction (MW)	1.1	1.1	1.1	1.1	1.1	<u>5.5</u>
		Winter Demand Reduction (MW)	0.7	0.7	0.7	0.7	0.7	<u>3.3</u>
		Projected Participation ³	1,600	1,585	1,596	1,608	1,623	<u>8,012</u>
WH > 10% UBC HPWH \$0.60/kWh	2.7.1	Energy Savings (MWh) ²	390	585	780	975	1,170	<u>3,900</u>
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	<u>0.9</u>
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	<u>0.9</u>
		Projected Participation ³	100	150	200	250	300	<u>1,000</u>
ENERGY STAR Certified Connected Thermostats	2.2.12	Energy Savings (MWh) ²	<u>2,910</u> <u>2,459</u>	<u>2,910</u> <u>2,730</u>	<u>2,910</u> <u>3,181</u>	<u>2,910</u> <u>3,632</u>	<u>2,910</u> <u>2,549</u>	<u>14,551</u>
		Summer Demand Reduction (MW)	0.4	0.4	<u>0.4</u> <u>0.5</u>	<u>0.4</u> <u>0.5</u>	0.4	<u>2.1</u>
		Winter Demand Reduction (MW)	<u>0.6</u> <u>0.5</u>	<u>0.6</u> <u>0.5</u>	0.6	<u>0.6</u> <u>0.7</u>	<u>0.6</u> <u>0.5</u>	<u>3.0</u> <u>2.9</u>
		Projected Participation ³	<u>7,906</u> <u>6,681</u>	<u>7,906</u> <u>7,416</u>	<u>7,906</u> <u>8,641</u>	<u>7,906</u> <u>9,866</u>	<u>7,906</u> <u>6,926</u>	<u>39,530</u>
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	2.1.1	Energy Savings (MWh) ²	<u>556</u> <u>71</u>	<u>534</u> <u>73</u>	<u>491</u> <u>76</u>	<u>454</u> <u>80</u>	<u>409</u> <u>64</u>	<u>2,435</u> <u>364</u>
		Summer Demand Reduction (MW)	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.3</u> <u>0.0</u>
		Winter Demand Reduction (MW)	<u>0.1</u> <u>0.0</u>	<u>0.5</u> <u>0.0</u>	<u>0.5</u> <u>0.0</u>	<u>0.6</u> <u>0.0</u>	<u>0.4</u> <u>0.0</u>	<u>2.1</u> <u>0.0</u>
		Projected Participation ³	<u>13,395</u> <u>1,707</u>	<u>12,853</u> <u>1,750</u>	<u>11,831</u> <u>1,838</u>	<u>10,919</u> <u>1,925</u>	<u>9,626</u> <u>1,532</u>	<u>58,625</u> <u>8,752</u>
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Energy Savings (MWh) ²	<u>545</u> <u>0</u>	<u>517</u> <u>0</u>	<u>466</u> <u>0</u>	<u>419</u> <u>0</u>	<u>377</u> <u>0</u>	<u>2,324</u> <u>1</u>
		Summer Demand Reduction (MW)	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.1</u> <u>0.0</u>	<u>0.3</u> <u>0.0</u>
		Winter Demand Reduction (MW)	<u>0.1</u> <u>0.0</u>	<u>0.2</u> <u>0.0</u>	<u>0.2</u> <u>0.0</u>	<u>0.2</u> <u>0.0</u>	<u>0.2</u> <u>0.0</u>	<u>0.9</u> <u>0.0</u>
		Projected Participation ³	<u>16,712</u> <u>6</u>	<u>15,877</u> <u>7</u>	<u>14,290</u> <u>7</u>	<u>12,862</u> <u>7</u>	<u>11,576</u> <u>6</u>	<u>71,317</u> <u>33</u>
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb	2.1.1	Energy Savings (MWh) ²	<u>362</u> <u>4</u>	<u>344</u> <u>4</u>	<u>311</u> <u>5</u>	<u>280</u> <u>5</u>	<u>252</u> <u>4</u>	<u>1,549</u> <u>22</u>

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>(Directional/Reflector)</i>		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.2~~ 0.0
		Winter Demand Reduction (MW)	0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.5~~ 0.0
		Projected Participation ⁻³	~~8,233~~ 98	~~7,828~~ 100	~~7,060~~ 105	~~6,370~~ 110	~~5,722~~ 88	~~35,243~~ 501
<i>LED and Electroluminescent Nightlights</i>	2.1.3	Energy Savings (MWh) ²	~~3~~ 0	~~3~~ 0	~~2~~ 0	~~2~~ 0	~~2~~ 0	~~12~~ 1
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	~~774~~ 49	~~666~~ 50	~~577~~ 53	~~500~~ 55	~~422~~ 44	~~2,940~~ 251
<i>Low-Flow Faucet Aerators: Direct install</i>	2.3.6	Energy Savings (MWh) ²	~~5~~ 4	~~5~~ 4	~~5~~ 4	5	4	~~25~~ 21
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.3~~ 0.0
		Projected Participation ⁻³	~~85~~ 73	~~87~~ 75	~~91~~ 79	~~95~~ 83	~~78~~ 66	~~436~~ 376
<i>Low-Flow Showerheads: Direct install</i>	2.3.7	Energy Savings (MWh) ²	~~7~~ 2	~~6~~ 2	~~5~~ 2	~~5~~ 2	~~4~~ 1	~~27~~ 8
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.2~~ 0.0
		Projected Participation ⁻³	~~102~~ 25	~~90~~ 25	~~83~~ 27	~~75~~ 28	~~62~~ 22	~~413~~ 127
<i>Thermostatic Shower Restriction Valves</i>	2.3.8	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	~~6~~ 5	~~6~~ 5	~~7~~ 6	~~7~~ 6	~~6~~ 5	~~32~~ 27
<i>Water Heater Tank Wrap</i>	2.3.3	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	1	1	1	1	1	5
<i>Water Heater Temperature Setback</i>	2.3.4	Energy Savings (MWh) ²	~~1~~ 0	~~1~~ 0	~~1~~ 0	~~1~~ 0	~~1~~ 0	~~5~~ 0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	~~13.1~~	~~13.1~~	~~13.1~~	~~13.1~~	~~13.1~~	~~65.5~~
Advanced Power Strips	2.5.1	Energy Savings (MWh) ²	~~4,756.1~~	~~4,580.1~~	~~4,404.1~~	~~4,404.1~~	~~4,404.1~~	~~22,549.4~~
		Summer Demand Reduction (MW)	~~0.1 0.0~~	~~0.1 0.0~~	~~0.1 0.0~~	~~0.1 0.0~~	~~0.1 0.0~~	~~0.6 0.0~~
		Winter Demand Reduction (MW)	~~0.2 0.0~~	~~0.2 0.0~~	~~0.2 0.0~~	~~0.2 0.0~~	~~0.2 0.0~~	~~0.8 0.0~~
		Projected Participation ⁻³	~~54,135.10~~	~~52,135.10~~	~~50,136.11~~	~~50,136.11~~	~~50,134.9~~	~~256,676.51~~
ENERGY STAR Air Purifiers - Direct Install LI & MF	2.4.14	Energy Savings (MWh) ²	24	24	26	27	21	121
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.3 0.0~~	~~0.3 0.0~~	~~0.4 0.0~~	~~0.3 0.0~~	~~1.3 0.0~~
		Projected Participation ⁻³	82	83	88	92	73	418
LED Exit Signs	3.1.4	Energy Savings (MWh) ²	3	4	4	4	3	18
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	12	13	13	14	11	63
Lighting Retrofits - Other Interior Fixtures	3.1.1	Energy Savings (MWh) ²	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~3.1 0.0~~	~~3.4 0.0~~	~~3.1 0.0~~	~~2.6 0.0~~	~~12.1 0.0~~
		Projected Participation ⁻³	20	20	21	22	18	101
Lighting Retrofits - Outdoor floods	3.1.1	Energy Savings (MWh) ²	15	15	16	17	13	76
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~1.6 0.0~~	~~0.9 0.0~~	~~0.9 0.0~~	~~0.9 0.0~~	~~4.4 0.0~~
		Projected Participation ⁻³	25	25	27	28	22	127
Lighting Retrofits - Parking Garage	3.1.1	Energy Savings (MWh) ²	6	6	6	7	5	29
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	8	8	8	9	7	40

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Lighting Retrofits - Parking Lot	3.1.1	Energy Savings (MWh) ²	16	16	17	18	14	82
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.1 0.0	0.0	0.2 0.0
		Projected Participation ³	25	25	27	28	22	127
Lighting: Permanent Fixture Removal	3.1.1	Energy Savings (MWh) ²	87	89	93	98	78	444
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.1 0.0	0.1 0.0	0.2 0.0	0.1 0.0	0.6 0.1
		Projected Participation ³	244	250	263	275	219	1,251
Linear LED: Lamp Replacement	3.1.1	Energy Savings (MWh) ²	12	12	13	14	11	62
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1 0.0
		Projected Participation ³	366	375	394	413	328	1,876
Linear LED: Retrofit Fixture, surface mount	3.1.1	Energy Savings (MWh) ²	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	25	25	27	28	22	127
Linear LED: Retrofit Fixture, troffer	3.1.1	Energy Savings (MWh) ²	6	6	7	7	6	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	25	25	27	28	22	127
Occupancy Sensor	3.1.3 2.1.2	Energy Savings (MWh) ²	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	6	7	7	7	6	33
Customer Education: Adjust Thermostat	N/A	Energy Savings (MWh)	7	8	8	8	7	38
		Summer Demand Reduction (MW)	=	=	=	=	=	=
		Winter Demand Reduction (MW)	=	=	=	=	=	=
		Projected Participation	244	250	263	275	219	1,251
Customer Education: Shorter Showers	N/A	Energy Savings (MWh)	4	4	4	4	3	19
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1 0.0
		Projected Participation ³	3,144 244	3,150 250	3,163 263	3,175 275	3,119 219	15,751 1,251
<u>Customer Education: Wash Laundry in Cold Water</u>	<u>N/A</u>	<u>Energy Savings (MWh)</u>	<u>9</u>	<u>9</u>	<u>9</u>	<u>10</u>	<u>8</u>	<u>44</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>244</u>	<u>250</u>	<u>263</u>	<u>275</u>	<u>219</u>	<u>1,251</u>
<i>HVAC Systems: PTAC</i>	2.2.1	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>HVAC Systems: PTHP</i>	2.2.1	Energy Savings (MWh) ²	14	14	14	14	14	70
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2 0.0
		Projected Participation ³	4	4	4	4	4	20
<u>Low-Flow Faucet Aerators: Kit</u>	<u>2.3.6</u>	<u>Energy Savings (MWh)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>
<u>Low-Flow Showerheads: Kit</u>	<u>2.3.7</u>	<u>Energy Savings (MWh)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>
<i>Advanced Power Strips: Kit</i>	2.5.1	Energy Savings (MWh) ²	1,488 0	1,488 0	1,488 0	1,488 0	1,488 0	7,440 0
		Summer Demand Reduction (MW)	0.2 0.0	0.2 0.0	0.2 0.0	0.2 0.0	0.2 0.0	0.9 0.0
		Winter Demand Reduction (MW)	0.2 0.0	0.5 0.0	0.5 0.0	0.5 0.0	0.5 0.0	2.3 0.0
		Projected Participation ³	20,001 1	20,001 1	20,001 1	20,001 1	20,001 1	100,005

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
								5
Connected Smart Thermostat	LS002 Load Shifting Measure	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.8	0.8	0.9	0.9	1.0	4.5
		Winter Demand Reduction (MW)	1.7	2.0 1.9	2.1 2.0	2.2 2.1	2.4 2.3	10.5 10.0
		Projected Participation ³	17,955	19,209	20,539	21,983	23,522	103,208
Electric Vehicle Managed Charging (Actively Managed)	LS006 Load Shifting Measure	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8
		Projected Participation ³	1,200	1,440	1,728	2,074	2,488	8,930
Behind the Meter Battery Storage (Bring Your Own)	LS012 Load Shifting Measure	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Winter Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Projected Participation ³	500	575	661	760	875	3,371
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	2.1.1	Energy Savings (MWh)	486	461	415	374	336	2,072
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.0	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.0	0.0	0.0	0.2
		Projected Participation	11,688	11,103	9,993	8,994	8,094	49,873
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Energy Savings (MWh)	544	517	465	419	377	2,322
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation	16,706	15,870	14,283	12,855	11,570	71,284
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Energy Savings (MWh)	358	340	306	275	248	1,527
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation	8,135	7,728	6,955	6,260	5,634	34,712
LED and Electroluminescent Nightlights	2.1.3	Energy Savings (MWh)	3	2	2	2	2	11
		Summer Demand Reduction (MW)	=	=	=	=	=	=
		Winter Demand Reduction (MW)	=	=	=	=	=	=
		Projected Participation	725	616	524	445	378	2,689
Low-Flow Faucet	2.3.6	Energy Savings (MWh)	1	1	1	1	1	3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<u>Aerators: Direct install</u>		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>60</u>
<u>Low-Flow Showerheads: Direct install</u>	2.3.7	<u>Energy Savings (MWh)</u>	<u>5</u>	<u>4</u>	<u>4</u>	<u>3</u>	<u>3</u>	<u>18</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>77</u>	<u>65</u>	<u>56</u>	<u>47</u>	<u>40</u>	<u>286</u>
<u>Thermostatic Shower Restriction Valves</u>	2.3.8	<u>Energy Savings (MWh)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>
<u>Water Heater Temperature Setback</u>	2.3.4	<u>Energy Savings (MWh)</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>4</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>60</u>
Water Heater Pipe Insulation	2.3.5	Energy Savings (MWh) ²	47	47	47	47	47	237
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.7
		Projected Participation ³	112	112	112	112	112	560
Smart Water Heater Controls	2.3.10	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	2.6.2	Energy Savings (MWh) ²	133,106	133,122	133,150	133,177	133,111	666
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	21,940-17,440	21,940-20,140	21,940-24,640	21,940-29,140	21,940-18,340	109,700

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Advanced Power Strips: Tier 1	2.5.1	Energy Savings (MWh) ²	59	59	59	59	59	293
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	822	822	822	822	822	4,110
Advanced Power Strips: Tier 2	2.5.1	Energy Savings (MWh) ²	64	64	64	64	64	320
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	466	466	466	466	466	2,330
ENERGY STAR Certified Connected Thermostats: ASHP	2.2.12	Energy Savings (MWh) ²	14	28	43	43	43	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	20	40	60	60	60	240
ENERGY STAR Certified Connected Thermostats: CAC-Only	2.2.12	Energy Savings (MWh) ²	5	18	18	18	18	79
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	20	80	80	80	80	340
ENERGY STAR Air Purifiers	2.4.14	Energy Savings (MWh) ²	351,318	351,338	351,371	351,404	351,325	1,756
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	1,985,179	1,985,190	1,985,209	1,985,225	1,985,183	9,925
High Efficiency Equipment: ASHP	2.2.1	Energy Savings (MWh) ²	2,760,209	2,767,252	2,828,322	2,828,391	2,828,246	14,011
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	1.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Projected Participation ³	2,256,171	2,262,064	2,312,634	2,312,320	2,312,183	11,454
High Efficiency Equipment: CAC	2.2.1	Energy Savings (MWh) ²	757,569	759,683	759,872	759,106	759,608	3,793
		Summer Demand Reduction (MW)	2.3	2.1	2.3	2.3	2.3	11.6
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	-	-	-	14,084

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	2.2.3		~~2,812~~ 2,112	~~2,818~~ 2,538	~~2,818~~ 3,238	~~2,818~~ 3,938	~~2,818~~ 2,258	
		Energy Savings (MWh) ²	~~1,820~~ 1,367	~~1,823~~ 1,642	~~1,823~~ 2,095	~~1,823~~ 2,549	~~1,823~~ 1,461	9,114
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	~~0.2~~ 0.1	0.2	0.2	~~0.2~~ 0.3	~~0.2~~ 0.1	~~1.0~~ 0.9
		Projected Participation- ³	~~3,012~~ 2,262	~~3,018~~ 2,718	~~3,018~~ 3,468	~~3,018~~ 4,218	~~3,018~~ 2,418	15,084
ECM Circulation Fans	2.2.4	Energy Savings (MWh) ²	~~961~~ 721	~~962~~ 866	~~962~~ 1,106	~~962~~ 1,346	~~962~~ 771	4,811
		Summer Demand Reduction (MW)	~~0.3~~ 0.2	0.3	0.3	~~0.3~~ 0.4	~~0.3~~ 0.2	1.5
		Winter Demand Reduction (MW)	~~0.2~~ 0.1	0.2	0.2	~~0.2~~ 0.3	0.2	0.9
		Projected Participation- ³	~~5,010~~ 3,760	~~5,016~~ 4,516	~~5,016~~ 5,766	~~5,016~~ 7,016	~~5,016~~ 4,016	25,074
Air Conditioner & Heat Pump Maintenance	2.2.6	Energy Savings (MWh) ²	~~332~~ 254	~~332~~ 301	~~332~~ 380	~~332~~ 458	~~332~~ 269	1,662
		Summer Demand Reduction (MW)	0.1	0.1	0.1	~~0.1~~ 0.2	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	~~0.5~~ 0.4
		Projected Participation- ³	~~1,057~~ 807	~~1,057~~ 957	~~1,057~~ 1,207	~~1,057~~ 1,457	~~1,057~~ 857	5,285
Duct Sealing & Duct Insulation	2.2.10	Energy Savings (MWh) ²	42	42	42	42	42	209
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	146	146	146	146	146	730
Furnace Maintenance	2.2.13	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation- ³	11	11	11	11	11	55
ENERGY STAR Bathroom Exhaust Fan	2.2.14	Energy Savings (MWh) ²	~~15~~ 11	~~15~~ 13	~~15~~ 17	~~15~~ 20	~~15~~ 12	73
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	~~212~~ 162	~~212~~ 192	~~212~~ 242	~~212~~ 292	~~212~~ 172	1,060
Heat Pump Water	2.3.1	Energy Savings (MWh) ²						2,777

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Heaters			~~542-408~~	~~553-499~~	~~560-641~~	~~560-776~~	~~560-453~~	
		Summer Demand Reduction (MW)	~~0.1-0.0~~	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	~~0.3-0.1~~	~~0.3-0.1~~	~~0.3-0.1~~	~~0.3-0.1~~	~~1.1-0.5~~
		Projected Participation ⁻³	~~302-227~~	~~308-278~~	~~312-357~~	~~312-432~~	~~312-252~~	1,546
Residential Air Sealing	2.6.1	Energy Savings (MWh) ²	45	45	45	45	45	227
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	~~0.1-0.0~~	~~0.1-0.0~~	~~0.1-0.0~~	~~0.1-0.0~~	~~0.5-0.0~~
		Projected Participation ⁻³	82	82	82	82	82	410
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	2.6.3	Energy Savings (MWh) ²	109	109	109	109	109	544
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.2-0.0~~	~~0.2-0.0~~	~~0.2-0.0~~	~~0.2-0.0~~	~~0.8-0.2~~
		Projected Participation ⁻³	61	61	61	61	61	305
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	2.6.3	Energy Savings (MWh) ²	15	15	15	15	15	74
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	80	80	80	80	80	400
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	2.6.3	Energy Savings (MWh) ²	22	22	22	22	22	110
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.1-0.0~~
		Projected Participation ⁻³	20	20	20	20	20	100
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJI Insulation	2.6.3	Energy Savings (MWh) ²	34	34	34	34	34	172
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ⁻³	93	93	93	93	93	465
Basement or Crawl Space Wall Insulation	2.6.4	Energy Savings (MWh) ²	3	3	3	3	3	17
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	4	4	4	4	4	19
ENERGY STAR Windows	2.6.5	Energy Savings (MWh) ²	3	6	12	15	17	53

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	10	20	40	48	58	176
<u>Advanced Power Strips: Kit</u>	<u>2.5.1</u>	<u>Energy Savings (MWh)</u>	<u>1,488</u>	<u>1,488</u>	<u>1,488</u>	<u>1,488</u>	<u>1,488</u>	<u>7,440</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.9</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>1.2</u>
		<u>Projected Participation</u>	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>100,000</u>
<u>Water Heater Pipe Insulation: Kit</u>	<u>2.3.5</u>	<u>Energy Savings (MWh)</u> ²	<u>412</u>	<u>412</u>	<u>412</u>	<u>412</u>	<u>412</u>	<u>2,060</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.2</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.4</u>
		<u>Projected Participation</u> ³	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>20,000</u>	<u>100,000</u>
<u>Customer Education: Shorter Showers</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>44</u>	<u>44</u>	<u>44</u>	<u>44</u>	<u>44</u>	<u>218</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>14,500</u>
<u>Customer Education: Wash Laundry in Cold Water</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>102</u>	<u>102</u>	<u>102</u>	<u>102</u>	<u>102</u>	<u>508</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>14,500</u>
<u>Customer Education: Adjust Thermostat</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>87</u>	<u>87</u>	<u>87</u>	<u>87</u>	<u>87</u>	<u>435</u>
		<u>Summer Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Winter Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Projected Participation</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>2,900</u>	<u>14,500</u>
<u>Room Air Conditioners</u>	<u>2.2.7</u>	<u>Energy Savings (MWh)</u> ²	<u>36.27</u>	<u>36.32</u>	<u>36.41</u>	<u>36.50</u>	<u>36.29</u>	<u>179</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.1 0.0</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1 0.0</u>	<u>0.3</u>
		<u>Winter Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Projected Participation</u> ³	<u>1,420 1,070</u>	<u>1,420 1,280</u>	<u>1,420 1,630</u>	<u>1,420 1,980</u>	<u>1,420 1,140</u>	<u>7,100</u>
<u>Window Heat Pump</u>	<u>2.2.9</u>	<u>Energy Savings (MWh)</u> ²	<u>94.71</u>	<u>94.84</u>	<u>94.108</u>	<u>94.131</u>	<u>94.75</u>	<u>469</u>

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	~~0.4~~ 0.3	0.4	0.4	~~0.4~~ 0.5	~~0.4~~ 0.3	2.0
		Projected Participation ³	~~150~~ 113	~~150~~ 135	~~150~~ 172	~~150~~ 210	~~150~~ 120	750
ENERGY STAR Refrigerators	2.4.1	Energy Savings (MWh) ²	~~656~~ 643	~~800~~ 772	~~944~~ 986	~~944~~ 1,200	~~944~~ 686	4,286
		Summer Demand Reduction (MW)	0.1	0.1	0.1	~~0.1~~ 0.2	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	~~9,100~~ 8,925	~~11,100~~ 10,710	~~13,100~~ 13,685	~~13,100~~ 16,660	~~13,100~~ 9,520	59,500
ENERGY STAR Clothes Washers	2.4.8	Energy Savings (MWh) ²	~~310~~ 297	~~371~~ 357	~~433~~ 456	~~433~~ 555	~~433~~ 317	1,981
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	~~5,000~~ 4,800	~~6,000~~ 5,760	~~7,000~~ 7,360	~~7,000~~ 8,960	~~7,000~~ 5,120	32,000
ENERGY STAR Clothes Dryers	2.4.9	Energy Savings (MWh) ²	~~364~~ 361	~~448~~ 433	~~532~~ 554	~~532~~ 674	~~532~~ 385	2,407
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation ³	~~4,350~~ 4,312	~~5,350~~ 5,175	~~6,350~~ 6,613	~~6,350~~ 8,050	~~6,350~~ 4,600	28,750
ENERGY STAR Dehumidifiers	2.4.11	Energy Savings (MWh) ²	~~1,763~~ 1,329	~~1,763~~ 1,589	~~1,763~~ 2,024	~~1,763~~ 2,458	~~1,763~~ 1,415	8,816
		Summer Demand Reduction (MW)	~~0.4~~ 0.3	~~0.4~~ 0.3	0.4	~~0.4~~ 0.5	~~0.4~~ 0.3	1.8
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	~~7,100~~ 5,350	~~7,100~~ 6,400	~~7,100~~ 8,150	~~7,100~~ 9,900	~~7,100~~ 5,700	35,500
Photovoltaic (PV) Solar Generation	2.8.3	Energy Savings (MWh) ²	~~13,601~~ 10,200	~~13,601~~ 12,240	~~13,601~~ 15,641	~~13,601~~ 19,041	~~13,601~~ 10,880	68,003
		Summer Demand Reduction (MW)	~~3.3~~ 2.5	~~3.3~~ 3.0	~~3.3~~ 3.8	~~3.3~~ 4.7	~~3.3~~ 2.7	16.6
		Winter Demand Reduction (MW)	~~0.4~~ 0.3	~~0.4~~ 0.3	0.4	~~0.4~~ 0.5	~~0.4~~ 0.3	1.9
		Projected Participation ³	~~1,500~~ 1,125	~~1,500~~ 1,350	~~1,500~~ 1,725	~~1,500~~ 2,100	~~1,500~~ 1,200	7,500

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<u>Advanced Power Strips</u>	<u>2.5.1</u>	<u>Energy Savings (MWh)</u>	<u>3,384</u>	<u>4,059</u>	<u>5,184</u>	<u>6,308</u>	<u>3,609</u>	<u>22,545</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.1</u>	<u>0.6</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>	<u>0.8</u>
		<u>Projected Participation</u>	<u>38,525</u>	<u>46,205</u>	<u>59,005</u>	<u>71,805</u>	<u>41,085</u>	<u>256,625</u>
<i>Water Heater Pipe Insulation - Instant Markdown</i>	2.3.5	Energy Savings (MWh) ²	~~5,591~~ 4,194	~~5,591~~ 5,032	~~5,591~~ 6,429	~~5,591~~ 7,827	~~5,591~~ 4,474	27,956
		Summer Demand Reduction (MW)	~~0.6~~ 0.5	0.6	~~0.6~~ 0.7	~~0.6~~ 0.9	~~0.6~~ 0.5	3.2
		Winter Demand Reduction (MW)	~~1.1~~ 0.8	~~1.1~~ 1.0	~~1.1~~ 1.2	~~1.1~~ 1.5	~~1.1~~ 0.8	5.3
		Projected Participation ³	~~75,040~~ 56,290	~~75,040~~ 67,540	~~75,040~~ 86,290	~~75,040~~ 105,040	~~75,040~~ 60,040	375,200
<i>Residential Occupancy Sensors</i>	2.1.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>Holiday Lights</i>	2.1.4	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP</i>	2.2.2	Energy Savings (MWh) ²	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>GSHP Desuperheaters</i>	2.2.5	Energy Savings (MWh) ²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>Air Handler Filter Whistles</i>	2.2.11	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Solar Water Heaters</i>	2.3.2	Energy Savings (MWh) ²	2	2	2	2	2	9

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Drain Water Heat Recovery Units	2.3.9	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Freezers	2.4.2	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Coolers	2.4.5	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Cooler Recycling with and without Replacement	2.4.6	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Residential Induction Cooktop	2.4.7	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Dishwashers	2.4.10	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Ceiling Fans	2.4.13	Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
ENERGY STAR Pool Pumps	2.8.1	Energy Savings (MWh) ²	0	0	0	0	0	0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Single Speed Pool Pump Replacement	2.8.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
		Energy Savings (MWh) ²	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5

Estimated Program Budget (Total) by Year

Table 10. Residential Program Budget

1 Residential							
Total Budget (\$000)		\$14,73813,709	\$15,01514,601	\$15,32115,949	\$15,58017,317	\$15,84014,917	\$76,493
Incentives (\$000)	Rebates	\$4,9764,317	\$5,1994,940	\$5,4675,862	\$5,7416,805	\$6,0375,496	\$27,419
	Upstream/Midstream Buydown	\$1,7871,418	\$1,8371,681	\$1,8872,121	\$1,8872,560	\$1,8871,505	\$9,285
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct-Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$8,0897,060	\$8,3667,952	\$8,6719,300	\$8,92910,667	\$9,1928,270	\$43,248
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912
	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0

	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245
Percent Incentives		55.52%	56.54%	57.58%	57.62%	58.55%	57%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential program offers incentives to customers in the residential, SCI, and LCI sectors. The Residential program accounts for 55.3% of the residential sector, 0.05% of the SCI sector, and 0.04% of the LCI sector spending exclusive of common cost allocation. SCI and LCI spending are attributed to measures rebated through the Residential program to master metered multifamily buildings.

Table 11. Residential Summary of EE&C Costs

(Description)													
Residential	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$1,510,591
SCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$4,612,577
LCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$4,612,577
Sector Total	Residential Energy Efficiency	\$43,248,211	\$0	\$0	\$0	\$24,911,942	\$8,332,915	\$0	\$0	\$0	\$76,493,069	\$315	\$1,539,773

Cost Effectiveness

Table 12. Residential TRC Benefits (Gross)

Residential	PY18	1.00	0.930 91	\$8,089 7,060	\$47,656 37,412	\$6,649	\$62,393 51,121	\$15,882 2,910	\$31,653 5,446	\$10,180 386	\$0	\$57,715 6,742
Residential	PY19	1.00	0.91	\$8,366 7,952	\$48,063 43,940	\$6,649	\$63,078 58,541	\$15,383 4,229	\$31,552 9,101	\$10,422 698	\$0	\$57,357 3,027
Residential	PY20	1.00	0.77	\$8,674 9,300	\$58,374 66,073	\$6,650	\$73,695 82,023	\$15,376 7,089	\$30,815 4,389	\$10,777 1,903	\$0	\$56,968 3,380
Residential	PY21	1.00	0.75	\$8,929 10,667	\$58,413 79,378	\$6,650	\$73,992 96,695	\$15,267 9,844	\$29,260 8,458	\$11,003 4,200	\$0	\$55,534 2,502
Residential	PY22	1.00	0.74	\$9,192 8,270	\$58,452 47,580	\$6,647	\$74,292 62,498	\$14,917 2,601	\$29,034 4,312	\$11,269 508	\$0	\$55,220 6,421
Residential Total		1.00		\$43,248	\$270,957 4,384	\$33,245	\$347,450 350,877	\$76,825 6,672	\$152,315 151,705	\$53,652 3,695	\$0	\$282,792 282,073

Table 13. Residential TRC Benefits (Net)

Residential	PY18	0.655	~~0.880~~ <u>86</u>	~~\$8,089~~ <u>7,060</u>	~~\$28,435~~ <u>22,078</u>	\$6,649	~~\$43,173~~ <u>35,787</u>	~~\$10,406~~ <u>8,459</u>	~~\$20,739~~ <u>16,672</u>	~~\$6,670~~ <u>5,495</u>	\$0	~~\$37,815~~ <u>30,626</u>
Residential	PY19	0.655	~~0.860~~ <u>85</u>	~~\$8,366~~ <u>7,952</u>	~~\$28,606~~ <u>26,048</u>	\$6,649	~~\$43,621~~ <u>40,649</u>	~~\$10,079~~ <u>9,323</u>	~~\$20,673~~ <u>19,067</u>	~~\$6,829~~ <u>6,354</u>	\$0	~~\$37,580~~ <u>34,743</u>
Residential	PY20	0.655	0.74	~~\$8,671~~ <u>9,300</u>	~~\$35,257~~ <u>40,085</u>	\$6,650	~~\$50,577~~ <u>56,034</u>	~~\$10,074~~ <u>1,196</u>	~~\$20,190~~ <u>2,532</u>	~~\$7,061~~ <u>799</u>	\$0	~~\$37,325~~ <u>41,527</u>
Residential	PY21	0.655	0.72	~~\$8,929~~ <u>10,667</u>	~~\$35,193~~ <u>48,331</u>	\$6,650	~~\$50,773~~ <u>65,648</u>	~~\$10,003~~ <u>3,002</u>	~~\$19,171~~ <u>5,198</u>	~~\$7,209~~ <u>304</u>	\$0	~~\$36,384~~ <u>47,503</u>
Residential	PY22	0.655	~~0.710~~ <u>70</u>	~~\$9,192~~ <u>8,270</u>	~~\$35,128~~ <u>28,323</u>	\$6,647	~~\$50,968~~ <u>43,240</u>	~~\$9,774~~ <u>8,256</u>	~~\$19,023~~ <u>5,929</u>	~~\$7,383~~ <u>6,230</u>	\$0	~~\$36,180~~ <u>30,415</u>
Residential Total		0.655		\$43,248	~~\$162,619~~ <u>164,865</u>	\$33,245	~~\$239,118~~ <u>224,358</u>	~~\$50,336~~ <u>50,236</u>	~~\$99,797~~ <u>99,397</u>	~~\$35,153~~ <u>35,181</u>	\$0	~~\$185,284~~ <u>184,814</u>

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings.

Other Information Deemed Appropriate

Refer to Section 9.1.4 for information about the hybrid heat pump load shifting pilot that will be implemented through the residential CSP.

Residential HER Program (2026-2031)

The Residential HER program is divided into two subprograms, one for market-rate customers and one for low-income customers. This section describes the Residential (market rate) HER subprogram, while Section 3.2.1 describes the Low-Income HER subprogram.

Objectives

The Residential HER program's objective is to reduce a home's energy use through HERs and access to online tools where customers can view various aspects of their energy use over time. This program leverages the power of social norms and education "coaching" to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market include PECO residential electric customers that do not qualify as low-income. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers. [Outreach for the non-low income HER program will leverage usage-based targeting approaches, including identification of customers with higher electricity usage.](#)

Program Description

The Residential HER program involves regularly delivering direct mail or emailed HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other Phase V energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, all customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor

comparison). The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The purpose of the website is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Residential HER program may also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP would provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (and why it matters). Communications would include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP would promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Residential HER program does not contain any components.

Coordination of Participation in other Act 129 programs

HERs will include marketing opportunities for cross-promoting other PECO Phase V Act 129 programs.

Implementation Strategy

The Residential HER program will be implemented by a CSP. The CSP will deliver and manage the website platform and direct mail or digital HERs to customers. HER program participants are grouped in waves, or cohorts. The CSP will launch new waves in addition to maintaining the legacy waves launched prior to Phase V. In Phase V, HER waves will have a multi-year measure life after the first year of deployment for energy and coincident peak demand savings. Savings will persist with a prescribed decay rate during the second year of deployment or later. The CSP will manage participation waves throughout Phase V to address measure life and persistence in accordance with the multiyear measure life framework and PECO's goals.

Program Issues and Risks and Risk Mitigation

The Residential HER program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential HER program have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

A minimal ramp up will be needed for the Residential HER program because this program is already operating in Phase IV. A longer ramp-up would be needed for the Peak Demand and Rate Education pieces, as they are new customer experiences.

Marketing Strategy

The Residential HER program participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

The program measure is the delivery of direct mail or digital HERs to customers. Customers are selected for the program and can choose to opt-out at any time. No incentives are paid to the customers.

Table 14. HER Eligible Measures

Home Energy Reports	per home	No	Yes	Phase V TRM	-	4 ²²²⁸	-

²²²⁸ HER savings experience 31.3% annual decay as outlined in the 2026 TRM and calculated from the Addendum to Act 129 Home Energy Report Persistence Study - Dated November 2018.

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Residential HER program.

Maximum Deadlines for Rebates

Rebates are not applicable to the Residential HER program.

Key Schedule Milestones

The planned implementation schedule follows:

- **March 2026:** PECO and the CSP will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems are in place, and that the randomization of new customers has been reviewed .
- **June 1, 2026:** The program will launch.
- **June 2026–May 2031:** Program will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, ~~2026~~2031:** Last day of the Phase V program.

Assumed EM&V

The evaluation methodology and data collection proposed for the program are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO ~~follow~~follows the SWE's Evaluation Framework, ~~utilize~~utilizes a SWE-approved Phase V evaluation plan, and ~~utilize~~utilizes an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program
- Energy savings associated with customer behavior change
- Program implementation costs

• Data for evaluating the program will come from the following sources:

- Tracking system data
- TRM estimates of measure savings persistence
- Surveys of customers who participate in the program
- Program implementer and PECO staff surveys or interviews
- Evaluation of billing data
- Program impacts will be determined using a customer billing data and billing regression analysis.

Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response, includes the following strategies:

- Interviews with utility staff, implementation staff, and customers
- Survey of program participants
- Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections and Estimated Participation

Table 15. HER Estimated Savings and Participation

<i>Home Energy Reports</i>	2.7.3	Energy Savings (MWh)	24,698	36,636	26,807	28,172	26,236	142,549
		Summer Demand Reduction (MW)	4.2	10.5	7.9	6.7	5.9	35.3
		Winter Demand Reduction (MW)	3.8	8.3	6.4	5.9	4.7	29.1
		Projected Participation	456,000	389,100	401,000	383,400	469,900	469,900

Estimated Program Budget (Total) by Year

Table 16. HER ~~Subprogram~~Program Budget

HER							
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential HER program participates in the residential sector. The Residential HER program accounts for 10.2% of residential sector spending exclusive of common cost allocation.

Table 17. HER Summary of EE&C Costs

(Describe)														
Residential Portfolio	HER	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512

Cost Effectiveness

Table 18. HER TRC Benefits (Gross)

HER	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
HER	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
HER	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
HER	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
HER	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
HER Total		1.00		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862

Table 19. HER TRC Benefits (Net)

HER	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
HER	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
HER	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
HER	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
HER	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
HER Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862

Summary of Benchmarking Results

As mentioned earlier in this section, PECO conducted benchmarking against similar utilities to inform the budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Residential HER program, PECO will continue to engage existing customers and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

3.2.1 Residential Low-Income Sub-Sector Programs

The Residential program and Residential HER program both include low-income subprograms. These subprograms are described below.

Residential Low-Income Subprogram Components (2026-2031)

Objectives

All Residential customers, including Residential Low-Income customers, will have access to all components included in the Residential Program described in Section 3.2.

The objective of the Residential Low-Income subprogram is to increase energy efficiency and address health and safety barriers for low-income customers in single family homes. The subprogram will also serve low-income customers in multifamily buildings in which 66% of occupants have a household income of less than or equal to 150% of the federal poverty level. PECO will meet this objective by:

- Aiming to reduce household energy costs for residential customers with a household income less than or equal to 150% of federal poverty level.
- Delivering no-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.
- Targeting high-impact, low-income multifamily sites for complementary direct-install projects and comprehensive retrofits with more favorable incentives.
- Addressing health and safety barriers in single family low-income homes to enable installation of energy efficiency measures and improve overall comfort and well-being. PECO has allocated \$3,000,000 for health and safety measures for low-income customers.

Target Market

- **Low-Income Single Family:** Includes PECO residential electric customers that are individually metered, regardless of building type, with a household income of less than or equal to 150% of the federal poverty level. This customer population includes low-income customers living in single family housing or low-income customers living in

multifamily housing that are individually metered. While these customers have similar usage patterns to non-low-income customers, homes may be more likely to need health and safety improvements prior to energy efficiency measure installation. When implementing components for low-income customers, the CSP will incorporate health and safety measures into the component offerings.

- **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls.
- **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval of comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.
- **Low-Income Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit and at least 66% of the occupants have a household income of less than or equal to 150% of the federal poverty level. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential Low-Income subprogram components are designed to offer PECO's low-income customers meaningful opportunities to save energy. For additional detail concerning the program's comprehensive design and delivery, please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

The Residential Low-Income subprogram components include:

- **Low-Income Single Family:** Enhances energy efficiency in single family homes for eligible customers, reducing electric bills and increasing comfort. All measures are fully subsidized. Offers free energy checkups, either in person or virtual, that include a home inspection, energy usage analysis, direct-install measures, and an energy education session, [including information, when finalized, on the energy efficiency benefits of heat pumps,](#) followed by a custom report. Also provides free electric heating

assessments, which add air flow diagnostics, infrared testing, building analysis, and combustion safety checks when appropriate. Units in individually metered multifamily buildings are served through this component as well. In addition, if the energy auditor identifies a customer who is potentially eligible for Rate RH, in accordance with PECO's Tariff, the technician will provide that customer with information about specific requirements for switching to Rate RH.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups, if a suitable vendor is obtained to provide pick up services. Encourages participation in other Residential programs.
- **New Construction:** Promotes building affordable housing that is more comfortable, durable, and energy efficient than those built to code. Collaborates with HERS raters and builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, EV managed charging, battery storage, water heaters) and behavioral measures, which may include TOU rates for eligible PECO customers.
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

The Residential CSP will administer the Residential Low-Income subprogram components with a team of partners that have a proven record of providing the services offered in this program. The implementation strategy will vary by program component:

- **Low-Income Single Family:** The CSP will offer two appointment types for customers:
 - **Free Energy Checkups** include an in-depth inspection of the home, energy use analysis and recommendations, direct-install measures, and an energy education session followed by a customer report and education materials.
 - **Free Energy Check Up Plus Assessments** will include all elements of the Free Energy Checkup and will incorporate an in-depth building science approach that mirrors PECO LIURP and meets BPI standards. The assessment will include air flow diagnostics, infrared testing, building analysis, and combustion safety checks when appropriate. Only low-income customers who have permanently installed electric systems are eligible for the Free Energy Check Up Plus appointment; all other low-income customers are eligible for the Free Energy Check Up appointment.
- **Appliance Recycling:** The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners, and dehumidifiers. An additional option will be available for customers to drop off regular

household sized refrigerators and freezers at a designated location. After the event, the CSP will verify income eligibility of participating customers and will help facilitate scheduling of Free Energy Check Up assessments for customers who affirmatively opt in.

- **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters. The CSP will target outreach within low-income communities by partnering with affordable housing developers, community-based organizations, and local stakeholders.
- **DLS:** The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:
- **Managed EV Charging** to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.
- **Thermostat Optimization** to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.
- ~~☐~~ **A BYO Bring Your Own Battery** offering that will discharge batteries to ~~lower-~~ **gridlowergrid** demand during peak periods. The offerings will enroll existing residential battery systems to leverage existing infrastructure rather than providing incentives for new battery installation.
- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

In addition to the program issues and risks and risk mitigation described in Section 3.2, PECO anticipates potential risks concerning changes to federal program funding for low-income programs including LIHEAP and WAP. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential Low-Income subprogram have anticipated costs of \$0 for Phase V after incentives.

Ramp-Up Strategy

Minimal ramp up will be needed for the Residential Low-Income subprogram components because the Single Family, New Construction, and Appliance Recycling components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential Low-Income subprogram components.

PECO will incorporate energy efficiency education into existing CAP outreach events to generate awareness about Act 129 and other PECO assistance programs within 180 days of the start of Phase V.

- **Low-Income Single Family:** Emails, direct mail, outbound calls, social media and digital ads, direct engagement at food banks, social service centers, and community events
- **Appliance Recycling:** Emails, bill inserts, social media, cross-promotions with municipal recycling events
- **New Construction:** Direct builder outreach, education events and partnerships with trusted associations (i.e., home building associations, housing authorities, community developers), and technical assistance, case studies, and collaboration with manufacturers
- **DLS:** Co-branded marketing (i.e., thermostats ~~and~~, EV chargers and batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; and newsletters

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC (heat pump, ductless mini-splits, central ACs), appliances, shell (attic insulation, air sealing), duct sealing and insulation, water heating (heat pump water heaters), and plug loads. All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Table 20. Residential Low-Income Subprogram Eligible Measures

29							
High Efficiency Equipment: ASHP	per unit	Yes	Yes	Phase V TRM	\$2,685.98	15	\$0.00 - \$10,000.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	per heat pump	Yes	Yes	Phase V TRM	\$2,146.33	15	\$0.00 - \$16,000.00
Room Air Conditioners	per room A/C	Yes	Yes	Phase V TRM	\$510.46	9	\$0.00 - \$600.00
Duct Sealing & Duct Insulation	per home	Yes	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$600.00
Residential Air Sealing	per home	Yes	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	Yes	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$1,800.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	Yes	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$660.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	per home	Yes	Yes	Phase V TRM	\$700.00	15	\$0.00 - \$700.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 - \$1,800.00
Basement or Crawl Space Wall Insulation	per home	Yes	Yes	Phase V TRM	\$155.63	15	\$0.00 - \$550.00
Heat Pump Water Heaters	per water heater	Yes	Yes	Phase V TRM	\$3,364.09	10	\$0.00 - \$3,600.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	Yes	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
WH LI > 10% UBC \$0.40/kWh	per home	Yes	Yes	Phase V TRM	\$1,100.00	15	\$0.00 - \$1,100.00
HVAC Systems: PTAC	per PTAC	Yes	Yes	Phase V TRM	\$1,571.00	15	\$0.00 - \$1,571.00
HVAC Systems: PTHP	per PTHP	Yes	Yes	Phase V TRM	\$2,094.00	15	\$0.00 - \$2,094.00
Residential New Construction	per home	Yes	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
ENERGY STAR Manufactured Homes	per home	Yes	Yes	Phase V TRM	\$1,984.87	15	\$0.00 - \$1,984.87
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation	per home	Yes	No	Phase V TRM	\$350.00	15	\$0.00 - \$350.00

²⁹ PECO applied the definition for comprehensive measure from Table 8 Addendum from the Final Act 129 Phase V EE&C Plan Template Tables Workbook, available at: [Energy Efficiency and Conservation \(EE&C\) Program | PA PUC and specifically here: 1894161.xlsx](#)

29							
Dehumidifier Retirement	per dehumidifier	Yes	~~Yes~~ No	Phase V TRM	\$10.00	4	\$0.00 - \$10.00
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	Yes	~~Yes~~ No	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling with and without Replacement	per refrigerator	Yes	~~Yes~~ No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Room AC (RAC) Retirement	per room A/C	Yes	~~Yes~~ No	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	Yes	~~Yes~~ No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	Yes	~~Yes~~ No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Refrigerator / Freezer Recycling - LIURP & WRx	per refrigerator	Yes	~~Yes~~ No	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	Yes	~~Yes~~ No	Phase V TRM	\$4.40	2	\$0.00 - \$4.40
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	Yes	~~Yes~~ No	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	Yes	~~Yes~~ No	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	Yes	~~Yes~~ No	Phase V TRM	~~\$3.25~~ 2.60	8	\$0.00 - \$3.25
Low-Flow Faucet Aerators: Direct install	per aerator	Yes	~~Yes~~ No	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	Yes	~~Yes~~ No	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	Yes	~~Yes~~ No	Phase V TRM	~~\$42.00~~ 41.75	15	\$0.00 - \$42.00
Water Heater Pipe Insulation	per water heater	Yes	~~Yes~~ No	Phase V TRM	\$59.80	11	\$0.00 - \$59.80
Water Heater Tank Wrap	per tank	Yes	~~Yes~~ No	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	Yes	~~Yes~~ No	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	Yes	~~Yes~~ No	Phase V TRM	~~\$60.00~~ 56.50	5	\$0.00 - \$60.00
ENERGY STAR Certified	per thermostat	Yes	~~Yes~~ No	Phase V TRM	~~\$300.00~~ 168.42	9	\$0.00 - \$300.00

29							
Connected Thermostats							
High Efficiency Equipment: ASHP	per unit-	Yes	Yes	Phase V TRM	\$16,000.00	15	\$0.00 – \$16,000.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump – IE Direct Install	per heat pump	Yes	Yes	Phase V TRM	\$10,000.00	15	\$0.00 – \$10,000.00
Room Air Conditioners	per room A/C	Yes	Yes	Phase V TRM	\$600.00	9	\$0.00 – \$600.00
Air Conditioner & Heat Pump Maintenance	per unit	Yes	YesNo	Phase V TRM	~~\$350.00~~ 141.40	3	\$0.00 - \$350.00
Duct Sealing & Duct InsulationENERGY STAR Air Purifiers - Direct Install LI & MF	per homeair purifier	Yes	YesNo	Phase V TRM	~~\$600.00~~ 200.00	159	\$0.00 - ~~\$600.00~~ 300.00
Residential Air SealingCustomer Education: Adjust Thermostat	per home	Yes	YesNo	Phase V TRM	~~\$449.64~~ 20.00	151	\$0.00 - ~~\$449.64~~ 20.00
Ceiling/Attic, Wall, Floor and Rim-Joist Insulation: Ceiling/Attic	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 – \$1,800.00
Ceiling/Attic, Wall, Floor and Rim-Joist Insulation: Floor InsulationCustomer Education: Shorter Showers	per home	Yes	YesNo	Phase V TRM	~~\$660.00~~ 15.00	151	\$0.00 - ~~\$660.00~~ 15.00
Ceiling/Attic, Wall, Floor and Rim-Joist Insulation: Rim-Joist InsulationCustomer Education: Wash Laundry in Cold Water	per home	Yes	YesNo	Phase V TRM	~~\$700.00~~ 15.00	151	\$0.00 - ~~\$700.00~~ 15.00
Ceiling/Attic, Wall, Floor and Rim-Joist Insulation: Wall Insulation	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 – \$1,800.00
Basement or Crawl Space Wall Insulation	per home	Yes	Yes	Phase V TRM	\$550.00	15	\$0.00 – \$550.00
ENERGY STAR Air Purifiers -- Direct Install LI & MF	per air purifier	Yes	Yes	Phase V TRM	\$300.00	9	\$0.00 – \$300.00
Heat Pump Water Heaters	per water-heater	Yes	Yes	Phase V TRM	\$3,600.00	10	\$0.00 – \$3,600.00
Health & Safety	per audit	Yes	No	Phase V TRM	\$1,000.00	1	\$0.00 - \$1,000.00
Health & Safety - Devices	per audit	Yes	No	Phase V TRM	\$50.00	1	\$0.00 - \$50.00
Advanced Power Strips: Kit	per advanced	Yes	YesNo	Phase V TRM	\$40.07	5	\$0.00 - \$40.07

	power strip						
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit	per gasket	Yes	~~Yes~~ No	Phase V TRM	~~\$3.58~~ <u>\$35.84</u>	15	\$0.00 - ~~\$3.58~~ <u>\$35.84</u>
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit	per door	Yes	~~Yes~~ No	Phase V TRM	\$26.00	15	\$0.00 - \$26.00
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping: Kit	per door	Yes	~~Yes~~ No	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
Smart Water Heater Controls	per water heater controller	Yes	~~Yes~~ No	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
ENERGY STAR Air Purifiers	per air purifier	Yes	~~Yes~~ No	Phase V TRM	\$66.03	9	\$0.00 - \$66.03
ECM Circulation Fans	per fan	Yes	~~Yes~~ No	Phase V TRM	\$352.79	5	\$0.00 - \$352.79
High Efficiency Equipment:- ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	Yes	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	Yes	~~Yes~~ No	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep - LIURP & WRx	per door	Yes	~~Yes~~ No	Phase V TRM	\$26.00	15	\$0.00 - \$26.00
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx	per door	Yes	~~Yes~~ No	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
WH-LI > 10% UBC \$0.40/kWh	per home	Yes	Yes	Phase V TRM	\$1,100.00	15	\$0.00 - \$1,100.00
LED Exit Signs	per sign	Yes	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	Yes	No	Phase V TRM	~~\$80.00~~ <u>\$27.00</u>	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	Yes	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	Yes	No	Phase V TRM	~~\$120.00~~ <u>\$97.00</u>	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	Yes	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00
Lighting: Permanent Fixture Removal	per fixture	Yes	No	Phase V TRM	\$60.00	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	Yes	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	Yes	No	Phase V TRM	~~\$150.00~~ <u>\$52.00</u>	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	Yes	No	Phase V TRM	~~\$250.00~~ <u>\$76.00</u>	15	\$0.00 - \$250.00

29							
Linear LED: Retrofit Fixture, troffer	per fixture	Yes	No	Phase V TRM	\$55.00	15	\$0.00 – \$55.00
Occupancy Sensor	per sensor	Yes	No	Phase V TRM	~~\$1,571.00~~ 55.00	8	\$0.00 - ~~\$1,571.00~~ 55.00
HVAC Systems: PTAC	per PTAC	Yes	Yes	Phase V TRM	\$2,094.00	15	\$0.00 – \$2,094.00
HVAC Systems: PTHP	per PTHP	Yes	Yes	Phase V TRM	\$23.06	15	\$0.00 – \$23.06
Connected Smart Thermostat	per unit	Yes	No	Phase V TRM	~~\$50.00~~ 17.30	1	\$0.00 - ~~\$50.00~~ 23.06
Bring Your Own Thermostat (Enrollment Incentive)	per unit	Yes	No	Phase V TRM	~~\$35.50~~ 37.50	1	\$0.00 - ~~\$35.50~~ 50.00
Bring Your Own Thermostat	per unit	Yes	No	Phase V TRM	~~\$4,792.32~~ 26.63	1	\$0.00 - ~~\$4,792.32~~ 35.50
ASHRAE Level 2 Audit	per audit	Yes	No	Phase V TRM	~~\$11.20~~ 4,792.32	1	\$0.00 - ~~\$11.20~~ 4,792.32
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam	per can	Yes	YesNo	Phase V TRM	~~\$2,133.95~~ 11.20	15	\$0.00 - ~~\$2,133.95~~ 11.20
Residential New Construction	per home	Yes	Yes	Phase V TRM	\$1,984.87	15	\$0.00 – \$1,984.87
ENERGY STAR Manufactured Homes	per home	Yes	Yes	Phase V TRM	\$11.20	15	\$0.00 – \$11.20
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit	per can	Yes	YesNo	Phase V TRM	~~\$350.00~~ 11.20	15	\$0.00 - ~~\$350.00~~ 11.20
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Knee wall Insulation Lighting Retrofits - Low Bays	per home fixture	Yes	YesNo	Phase V TRM	\$42.88	15	\$0.00 - \$42.88
Lighting Retrofits - Low High Bays	per fixture	Yes	No	Phase V TRM	\$31.94	15	\$0.00 - \$31.94
Lighting Retrofits - High Bays	per fixture	Yes	No	Phase V TRM	\$10.00	15	\$0.00 – \$10.00
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to offer no-cost installation of additional measures that are not listed Table 20 but are identified in the TRM.

Basis for the Proposed Incentive Levels

All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Maximum Deadlines for Rebates

As Residential Low-Income subprogram direct-installation measures are provided at no charge, an application deadline is not applicable to this subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Residential Low-Income subprogram components after meeting its low-income carve-out subject to the Commission-approved budget for the program.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the Residential Low-Income subprogram components through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Table 21. Residential Low-Income Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Dehumidifier Retirement</i>	2.4.12	Energy Savings (MWh) ²	20	20	21	22	17	100
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	20	20	21	22	17	100
<i>Low-Capacity Refrigerator / Freezer Recycling without Replacement</i>	2.4.4	Energy Savings (MWh) ²	2	2	2	2	1	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	6	6	6	7	5	30
<i>Refrigerator / Freezer Recycling with and without Replacement</i>	2.4.3	Energy Savings (MWh) ²	210	216	227	238	188	1,079
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	268	275	289	303	240	1,375
<i>Room AC (RAC) Retirement</i>	2.2.8	Energy Savings (MWh) ²	76	78	82	86	68	389
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	585	600	630	660	525	3,000
<i>Low-Flow Faucet Aerators: Kit</i>	2.3.6	Energy Savings (MWh) ²	~~755~~ <u>567</u>	~~755~~ <u>567</u>	~~755~~ <u>567</u>	~~755~~ <u>567</u>	~~755~~ <u>567</u>	~~3,777~~ <u>2,833</u>
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	~~0.4~~ <u>0.3</u>
		Winter Demand Reduction (MW)	0.1	~~0.2~~ <u>0.1</u>	~~0.2~~ <u>0.1</u>	~~0.2~~ <u>0.1</u>	~~0.2~~ <u>0.1</u>	~~1.1~~ <u>0.5</u>
		Projected Participation ³	~~48,002~~ <u>36,001</u>	~~48,002~~ <u>36,001</u>	~~48,002~~ <u>36,001</u>	~~48,002~~ <u>36,001</u>	~~48,002~~ <u>36,001</u>	~~240,040~~ <u>180,005</u>
<i>Low-Flow Showerheads: Kit</i>	2.3.7	Energy Savings (MWh) ²	~~404~~ <u>303</u>	~~404~~ <u>303</u>	~~404~~ <u>303</u>	~~404~~ <u>303</u>	~~404~~ <u>303</u>	~~2,021~~ <u>1,516</u>
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	~~0.3~~ <u>0.1</u>	~~0.3~~ <u>0.1</u>	~~0.3~~ <u>0.1</u>	~~0.3~~ <u>0.1</u>	~~1.2~~ <u>0.3</u>
		Projected Participation ³	~~24,002~~ <u>18,001</u>	~~24,002~~ <u>18,001</u>	~~24,002~~ <u>18,001</u>	~~24,002~~ <u>18,001</u>	~~24,002~~ <u>18,001</u>	~~120,040~~ <u>90,005</u>
<i>Refrigerator / Freezer Recycling -</i>	2.4.3	Energy Savings (MWh) ²	314	314	314	314	314	1,570

LIURP & WRx		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	400	400	400	400	400	2,000
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	2.1.1	Energy Savings (MWh) ²	~~4,103~~ <u>3,157</u>	~~4,208~~ <u>3,236</u>	~~4,418~~ <u>3,394</u>	~~4,628~~ <u>3,473</u>	~~3,682~~ <u>2,526</u>	~~21,038~~ <u>15,785</u>
		Summer Demand Reduction (MW)	~~0.6~~ 0.4	~~0.6~~ 0.4	~~0.6~~ 0.5	~~0.6~~ 0.5	~~0.5~~ 0.3	~~2.9~~ 2.2
		Winter Demand Reduction (MW)	~~0.4~~ 0.3	~~0.5~~ 0.4	~~0.5~~ 0.4	~~0.6~~ 0.4	~~0.4~~ 0.3	~~2.5~~ 1.7
		Projected Participation ³	~~98,754~~ <u>76,000</u>	~~101,285~~ <u>77,900</u>	~~106,350~~ <u>81,700</u>	~~111,414~~ <u>83,600</u>	~~88,625~~ <u>60,800</u>	~~506,428~~ <u>380,000</u>
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	2.1.1	Energy Savings (MWh) ²	~~638~~ <u>557</u>	~~654~~ <u>571</u>	~~687~~ <u>599</u>	~~719~~ <u>613</u>	~~572~~ <u>446</u>	~~3,269~~ <u>2,786</u>
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	~~0.2~~ 0.1	~~0.2~~ 0.1	~~0.2~~ 0.1	~~0.2~~ 0.1	~~1.0~~ 0.5
		Projected Participation ³	~~19,566~~ <u>17,100</u>	~~20,068~~ <u>17,528</u>	~~21,072~~ <u>18,383</u>	~~22,075~~ <u>18,810</u>	~~17,559~~ <u>13,680</u>	~~100,340~~ <u>85,501</u>
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	2.1.1	Energy Savings (MWh) ²	~~475~~ <u>334</u>	~~487~~ <u>343</u>	~~512~~ <u>359</u>	~~536~~ <u>368</u>	~~426~~ <u>267</u>	~~2,436~~ <u>1,672</u>
		Summer Demand Reduction (MW)	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	0.1	~~0.1~~ 0.0	~~0.3~~ 0.2
		Winter Demand Reduction (MW)	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.5~~ 0.2
		Projected Participation ³	~~10,802~~ <u>7,600</u>	~~11,078~~ <u>7,790</u>	~~11,632~~ <u>8,170</u>	~~12,186~~ <u>8,360</u>	~~9,694~~ <u>6,080</u>	~~55,392~~ <u>38,000</u>
LED and Electroluminescent Nightlights	2.1.3	Energy Savings (MWh) ²	~~5~~ 3	~~5~~ 3	~~6~~ 3	~~6~~ 3	~~5~~ 2	~~27~~ 15
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	~~1,306~~ <u>760</u>	~~1,339~~ <u>779</u>	~~1,407~~ <u>817</u>	~~1,473~~ <u>836</u>	~~1,172~~ <u>608</u>	~~6,697~~ <u>3,800</u>
Low-Flow Faucet Aerators: Direct install	2.3.6	Energy Savings (MWh) ²	~~319~~ <u>221</u>	~~327~~ <u>225</u>	~~342~~ <u>235</u>	~~357~~ <u>240</u>	~~290~~ <u>182</u>	~~1,634~~ <u>1,103</u>
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.2~~ 0.1

		Winter Demand Reduction (MW)	~~0.1~~ <u>0.0</u>	~~0.1~~ <u>0.0</u>	~~0.1~~ <u>0.0</u>	~~0.1~~ <u>0.0</u>	~~0.1~~ <u>0.0</u>	~~0.3~~ <u>0.2</u>
		Projected Participation ⁻³	~~5,682~~ <u>3,925</u>	~~5,816~~ <u>4,011</u>	~~6,081~~ <u>4,182</u>	~~6,347~~ <u>4,267</u>	~~5,152~~ <u>3,241</u>	~~29,078~~ <u>19,626</u>
Low-Flow Showerheads: Direct install	2.3.7	Energy Savings (MWh) ⁻²	~~225~~ <u>169</u>	~~229~~ <u>172</u>	~~238~~ <u>178</u>	~~246~~ <u>180</u>	~~208~~ <u>147</u>	~~1,147~~ <u>847</u>
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ⁻³	~~3,476~~ <u>2,614</u>	~~3,540~~ <u>2,657</u>	~~3,674~~ <u>2,742</u>	~~3,805~~ <u>2,785</u>	~~3,211~~ <u>2,272</u>	~~17,706~~ <u>13,070</u>
Thermostatic Shower Restriction Valves	2.3.8	Energy Savings (MWh) ⁻²	~~15~~ <u>11</u>	~~15~~ <u>11</u>	~~16~~ <u>12</u>	~~16~~ <u>12</u>	~~13~~ <u>9</u>	~~75~~ <u>54</u>
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	~~504~~ <u>372</u>	~~516~~ <u>381</u>	~~541~~ <u>398</u>	~~565~~ <u>406</u>	~~456~~ <u>304</u>	~~2,582~~ <u>1,861</u>
Water Heater Pipe Insulation	2.3.5	Energy Savings (MWh) ⁻²	~~887~~ <u>738</u>	~~908~~ <u>754</u>	~~948~~ <u>786</u>	~~989~~ <u>802</u>	~~806~~ <u>609</u>	~~4,538~~ <u>3,689</u>
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	~~0.5~~ <u>0.4</u>
		Winter Demand Reduction (MW)	~~0.2~~ <u>0.1</u>	~~0.2~~ <u>0.1</u>	~~0.2~~ <u>0.1</u>	0.2	~~0.2~~ <u>0.1</u>	~~0.9~~ <u>0.7</u>
		Projected Participation ⁻³	~~2,092~~ <u>1,740</u>	~~2,140~~ <u>1,778</u>	~~2,236~~ <u>1,854</u>	~~2,332~~ <u>1,892</u>	~~1,900~~ <u>1,436</u>	~~10,700~~ <u>8,700</u>
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh) ⁻²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	~~2~~ <u>1</u>	~~2~~ <u>1</u>	~~2~~ <u>1</u>	~~2~~ <u>1</u>	~~2~~ <u>1</u>	~~10~~ <u>5</u>
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh) ⁻²	~~28~~ <u>27</u>	~~29~~ <u>28</u>	~~30~~ <u>29</u>	~~32~~ <u>30</u>	~~25~~ <u>22</u>	~~144~~ <u>136</u>
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	~~391~~ <u>380</u>	~~401~~ <u>390</u>	~~421~~ <u>409</u>	~~441~~ <u>418</u>	~~351~~ <u>304</u>	~~2,005~~ <u>1,901</u>
Advanced Power Strips	2.5.1	Energy Savings (MWh) ⁻²	~~52~~ <u>40</u>	~~54~~ <u>41</u>	~~57~~ <u>43</u>	~~59~~ <u>44</u>	~~47~~ <u>32</u>	~~269~~ <u>200</u>

		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.6~~ 0.0
		Projected Participation ³	~~597~~ 456	~~612~~ 467	~~644~~ 490	~~673~~ 502	~~536~~ 365	~~3,062~~ 2,280
ENERGY STAR Certified Connected Thermostats	2.2.12	Energy Savings (MWh) ²	~~119~~ 106	~~121~~ 108	~~125~~ 110	~~128~~ 112	~~112~~ 95	~~606~~ 532
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	~~0.6~~ 0.0	~~0.6~~ 0.0	~~0.6~~ 0.0	~~0.6~~ 0.0	~~2.4~~ 0.1
		Projected Participation ³	~~324~~ 289	~~329~~ 293	~~339~~ 300	~~348~~ 304	~~305~~ 259	~~1,645~~ 1,445
High Efficiency Equipment: ASHP	2.2.1	Energy Savings (MWh) ²	~~104~~ 66	~~105~~ 67	~~111~~ 71	~~116~~ 72	~~93~~ 53	~~530~~ 329
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.1~~ 0.0
		Winter Demand Reduction (MW)	0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.6~~ 0.0
		Projected Participation ³	~~85~~ 54	~~86~~ 55	~~91~~ 58	~~95~~ 59	~~76~~ 43	~~433~~ 269
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	2.2.3	Energy Savings (MWh) ²	~~36~~ 92	~~37~~ 94	~~39~~ 99	~~41~~ 101	~~33~~ 74	~~185~~ 459
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	~~42~~ 107	~~43~~ 110	~~45~~ 115	~~48~~ 118	~~38~~ 86	~~216~~ 536
Room Air Conditioners	2.2.7	Energy Savings (MWh) ²	28	28	28	28	28	139
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1,101	1,101	1,101	1,101	1,101	5,505
Air Conditioner & Heat Pump Maintenance	2.2.6	Energy Savings (MWh) ²	~~114~~ 118	~~115~~ 119	~~117~~ 122	~~120~~ 123	~~108~~ 107	~~574~~ 590
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.4~~ 0.1
		Projected Participation ³	~~361~~ 375	~~365~~ 379	~~373~~ 388	~~381~~ 392	~~345~~ 341	~~1,825~~ 1,875
Duct Sealing & Duct Insulation	2.2.10	Energy Savings (MWh) ²	~~2~~ 3	~~2~~ 3	~~2~~ 3	~~2~~ 3	2	~~11~~ 14
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	~~8-10~~	~~8-10~~	~~8-11~~	~~8-11~~	~~7-8~~	~~39-50~~
Residential Air Sealing	2.6.1	Energy Savings (MWh) ²	~~659-669~~	~~663-674~~	~~670-682~~	~~679-686~~	~~643-636~~	~~3,313-3,347~~
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	~~1.5-1.6~~
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	~~0.6~~
		Projected Participation ³	~~1,191-1,210~~	~~1,198-1,218~~	~~1,212-1,233~~	~~1,227-1,240~~	~~1,162-1,150~~	~~5,990-6,051~~
		Energy Savings (MWh) ²	~~381-405~~	~~390-413~~	~~408-431~~	~~424-440~~	~~348-333~~	~~1,951-2,023~~
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	2.6.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Winter Demand Reduction (MW)	0.1	~~0.2-0.1~~	0.2	0.2	~~0.2-0.1~~	~~0.9-0.7~~
		Projected Participation ³	~~214-227~~	~~219-232~~	~~229-242~~	~~238-247~~	~~195-187~~	~~1,095-1,135~~
		Energy Savings (MWh) ²	~~68-77~~	~~71-79~~	~~74-83~~	~~78-85~~	62	~~353-386~~
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	2.6.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.2-0.1~~
		Projected Participation ³	~~62-70~~	~~64-72~~	~~67-75~~	~~71-77~~	56	~~320-350~~
		Energy Savings (MWh) ²	~~32-36~~	~~33-37~~	~~34-39~~	~~37-40~~	29	~~165-180~~
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	2.6.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.1~~
		Projected Participation ³	~~62-70~~	~~64-72~~	~~67-75~~	~~71-77~~	56	~~320-350~~
		Energy Savings (MWh) ²	~~11-13~~	~~12-13~~	~~12-14~~	~~13-14~~	10	~~57-62~~
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	2.6.3	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Projected Participation ³	~~12-14~~	~~13-14~~	~~13-15~~	~~14-15~~	11	~~63-69~~
		Energy Savings (MWh) ²	1	1	1	1	1	~~5~~
Basement or Crawl Space Wall Insulation	2.6.4	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	~~0.0~~

		Projected Participation ⁻³	1	1	1	1	1	5
ENERGY STAR Air Purifiers - Direct Install LI & MF	2.4.14	Energy Savings (MWh) ⁻²	~~2,021~~ <u>1,891</u>	~~2,073~~ <u>1,938</u>	~~2,177~~ <u>2,033</u>	~~2,281~~ <u>2,080</u>	~~1,814~~ <u>1,513</u>	~~10,367~~ <u>9,456</u>
		Summer Demand Reduction (MW)	0.2	~~0.3~~ <u>0.2</u>	~~0.3~~ <u>0.2</u>	0.3	0.2	~~1.3~~ <u>1.2</u>
		Winter Demand Reduction (MW)	0.3	0.3	0.3	~~0.4~~ <u>0.3</u>	~~0.3~~ <u>0.2</u>	~~1.7~~ <u>1.5</u>
		Projected Participation ⁻³	~~6,964~~ <u>6,515</u>	~~7,142~~ <u>6,678</u>	~~7,500~~ <u>7,004</u>	~~7,858~~ <u>7,167</u>	~~6,250~~ <u>5,212</u>	~~35,714~~ <u>32,576</u>
Heat Pump Water Heaters	2.3.1	Energy Savings (MWh) ⁻²	~~780~~ <u>790</u>	~~783~~ <u>796</u>	~~792~~ <u>805</u>	~~801~~ <u>808</u>	~~762~~ <u>754</u>	~~3,918~~ <u>3,954</u>
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	~~0.4~~ <u>0.5</u>
		Winter Demand Reduction (MW)	~~0.1~~ <u>0.2</u>	~~0.3~~ <u>0.2</u>	~~0.3~~ <u>0.2</u>	~~0.3~~ <u>0.2</u>	~~0.3~~ <u>0.1</u>	~~1.2~~ <u>0.8</u>
		Projected Participation ⁻³	~~434~~ <u>440</u>	~~436~~ <u>443</u>	~~441~~ <u>448</u>	~~446~~ <u>450</u>	~~424~~ <u>420</u>	~~2,181~~ <u>2,201</u>
<u>Customer Education: Adjust Thermostat</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>228</u>	<u>234</u>	<u>245</u>	<u>251</u>	<u>182</u>	<u>1,140</u>
		<u>Summer Demand Reduction (MW)</u>	-	-	-	-	-	-
		<u>Winter Demand Reduction (MW)</u>	-	-	-	-	-	-
		<u>Projected Participation</u>	<u>7,600</u>	<u>7,790</u>	<u>8,170</u>	<u>8,360</u>	<u>6,080</u>	<u>38,000</u>
<u>Customer Education: Shorter Showers</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>114</u>	<u>117</u>	<u>123</u>	<u>125</u>	<u>91</u>	<u>570</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.1</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>7,600</u>	<u>7,790</u>	<u>8,170</u>	<u>8,360</u>	<u>6,080</u>	<u>38,000</u>
<u>Customer Education: Wash Laundry in Cold Water</u>	<u>2.9.1</u>	<u>Energy Savings (MWh)</u>	<u>266</u>	<u>273</u>	<u>286</u>	<u>293</u>	<u>213</u>	<u>1,330</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.1</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.1</u>
		<u>Projected Participation</u>	<u>7,600</u>	<u>7,790</u>	<u>8,170</u>	<u>8,360</u>	<u>6,080</u>	<u>38,000</u>
Health & Safety	<u>Audit02N/A</u>	Energy Savings (MWh) ⁻²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	390	400	420	440	350	2,000
Health & Safety - Devices	<u>Audit02N/A</u>	Energy Savings (MWh) ⁻²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-

		Projected Participation ⁻³	3,900	4,000	4,200	4,400	3,500	20,000
Advanced Power Strips: Kit	2.5.1	Energy Savings (MWh) ⁻²	~~1,786~~ 1,339	~~1,786~~ 1,339	~~1,786~~ 1,339	~~1,786~~ 1,339	~~1,786~~ 1,339	~~8,928~~ 6,696
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	~~1.0~~ 0.8
		Winter Demand Reduction (MW)	~~0.3~~ 0.2	~~0.5~~ 0.2	~~0.5~~ 0.2	~~0.5~~ 0.2	~~0.5~~ 0.2	~~2.4~~ 1.1
		Projected Participation ⁻³	~~24,001~~ 18,000	~~24,001~~ 18,000	~~24,001~~ 18,000	~~24,001~~ 18,000	~~24,001~~ 18,000	~~120,005~~ 90,000
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit	2.6.2	Energy Savings (MWh) ⁻²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit	2.6.2	Energy Savings (MWh) ⁻²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping: Kit	2.6.2	Energy Savings (MWh) ⁻²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	1	1	1	1	1	5
Smart Water Heater Controls	2.3.10	Energy Savings (MWh) ⁻²	5	5	5	5	5	27
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	151	151	151	151	151	755
ENERGY STAR Air Purifiers	2.4.14	Energy Savings (MWh) ⁻²	34	34	34	34	34	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.1~~ 0.0	~~0.2~~ 0.0
		Projected Participation ⁻³	192	192	192	192	192	960
ECM Circulation Fans	2.2.4	Energy Savings (MWh) ⁻²	2	2	2	2	2	11
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.2~~ 0.0	~~0.8~~ 0.0
		Projected Participation ⁻³	11	11	11	11	11	55
High Efficiency Equipment: ENERGY STAR Most Efficient	2.2.3	Energy Savings (MWh) ⁻²	124	124	124	124	124	622

Ductless Mini-Split Heat Pump		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2 0.0	0.2 0.0	0.2 0.0	0.2 0.0	0.8 0.1
		Projected Participation ³	206	206	206	206	206	1,030
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	2.6.2	Energy Savings (MWh) ²	7	7	7	7	7	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.4 0.0
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep - LIURP & WRx	2.6.2	Projected Participation ³	1,100	1,100	1,100	1,100	1,100	5,500
		Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx	2.6.2	Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	200	200	200	200	200	1,000
		Energy Savings (MWh) ²	0	0	0	0	0	2
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx	2.6.2	Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	53	53	53	53	53	265
WH LI > 10% UBC \$0.40/kWh	2.7.1	Energy Savings (MWh) ²	300	300	300	300	300	1,500
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Projected Participation ³	400	400	400	400	400	2,000
<u>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)</u>	<u>2.1.1</u>	<u>Energy Savings (MWh)</u>	<u>698</u>	<u>715</u>	<u>750</u>	<u>768</u>	<u>558</u>	<u>3,489</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.5</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.4</u>
<u>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))</u>	<u>2.1.1</u>	<u>Projected Participation</u>	<u>16,800</u>	<u>17,220</u>	<u>18,060</u>	<u>18,480</u>	<u>13,440</u>	<u>84,000</u>
		<u>Energy Savings (MWh)</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>9</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
<u>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)</u>	<u>2.1.1</u>	<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>53</u>	<u>54</u>	<u>56</u>	<u>58</u>	<u>42</u>	<u>263</u>
		<u>Energy Savings (MWh)</u>	<u>37</u>	<u>38</u>	<u>40</u>	<u>41</u>	<u>30</u>	<u>185</u>
<u>LED and Electroluminescent Nightlights</u>	<u>2.1.3</u>	<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>840</u>	<u>861</u>	<u>903</u>	<u>924</u>	<u>672</u>	<u>4,200</u>
		<u>Energy Savings (MWh)</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>8</u>
		<u>Summer Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Winter Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Projected Participation</u>	<u>420</u>	<u>431</u>	<u>452</u>	<u>462</u>	<u>336</u>	<u>2,101</u>

<u>Low-Flow Faucet Aerators: Direct install</u>	<u>2.3.6</u>	<u>Energy Savings (MWh)</u>	<u>47</u>	<u>48</u>	<u>51</u>	<u>52</u>	<u>38</u>	<u>236</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>840</u>	<u>861</u>	<u>903</u>	<u>924</u>	<u>672</u>	<u>4,200</u>
<u>Low-Flow Showerheads: Direct install</u>	<u>2.3.7</u>	<u>Energy Savings (MWh)</u>	<u>27</u>	<u>28</u>	<u>29</u>	<u>30</u>	<u>22</u>	<u>136</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>420</u>	<u>431</u>	<u>452</u>	<u>462</u>	<u>336</u>	<u>2,101</u>
<u>Low Income Home Energy Reports</u>	<u>2.7.3</u>	<u>Energy Savings (MWh)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Summer Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Winter Demand Reduction (MW)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
		<u>Projected Participation</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
<u>Thermostatic Shower Restriction Valves</u>	<u>2.3.8</u>	<u>Energy Savings (MWh)</u>	<u>2</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>2</u>	<u>12</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>84</u>	<u>86</u>	<u>90</u>	<u>92</u>	<u>67</u>	<u>419</u>
<u>Water Heater Tank Wrap</u>	<u>2.3.3</u>	<u>Energy Savings (MWh)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>1</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>
<u>Water Heater Temperature Setback</u>	<u>2.3.4</u>	<u>Energy Savings (MWh)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>
<u>Advanced Power Strips</u>	<u>2.5.1</u>	<u>Energy Savings (MWh)</u>	<u>9</u>	<u>9</u>	<u>10</u>	<u>10</u>	<u>7</u>	<u>46</u>
		<u>Summer Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Winter Demand Reduction (MW)</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
		<u>Projected Participation</u>	<u>105</u>	<u>108</u>	<u>113</u>	<u>116</u>	<u>84</u>	<u>526</u>
<u>LED Exit Signs</u>	<u>3.1.4</u>	Energy Savings (MWh) ²	38	39	41	43	34	194
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	131	135	142	149	118	675
<u>Lighting Retrofits - Other Interior Fixtures</u>	<u>3.1.1</u>	Energy Savings (MWh) ²	46	47	50	52	42	237
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	3.1 0.0	3.4 0.0	3.1 0.0	2.6 0.0	12.1 0.0

		Projected Participation ⁻³	211	216	227	238	189	1,081
Lighting Retrofits - Outdoor floods	3.1.1	Energy Savings (MWh) ⁻²	158	162	170	178	142	809
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	1.6 0.0	0.9 0.0	0.9 0.0	0.9 0.0	4.4 0.2
		Projected Participation ⁻³	264	270	284	297	237	1,352
Lighting Retrofits - Parking Garage	3.1.1	Energy Savings (MWh) ⁻²	57	59	62	65	52	295
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	79	81	85	90	72	407
Lighting Retrofits - Parking Lot	3.1.1	Energy Savings (MWh) ⁻²	170	174	183	192	153	873
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.1 0.0	0.0	0.2
		Projected Participation ⁻³	264	270	284	297	237	1,352
Lighting: Permanent Fixture Removal	3.1.1	Energy Savings (MWh) ⁻²	933	957	1,005	1,053	837	4,786
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.2 0.1	0.1	0.7 0.6
		Projected Participation ⁻³	2,628	2,695	2,830	2,965	2,358	13,476
Linear LED: Lamp Replacement	3.1.1	Energy Savings (MWh) ⁻²	130	133	140	147	117	666
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ⁻³	3,942	4,043	4,245	4,447	3,538	20,215
Linear LED: Retrofit Fixture, surface mount	3.1.1	Energy Savings (MWh) ⁻²	47	48	50	53	42	239
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	264	270	284	297	237	1,352
Linear LED: Retrofit Fixture, troffer	3.1.1	Energy Savings (MWh) ⁻²	68	70	74	77	61	351
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	264	270	284	297	237	1,352
Occupancy Sensor	3.1.3 3.1.2	Energy Savings (MWh) ⁻²	8	8	9	9	7	42
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	66	68	72	75	59	340
Customer Education: Adjust	N/A	Energy Savings (MWh)	63	65	68	69	50	315

<u>Thermostat</u>		<u>Summer Demand Reduction (MW)</u>	-	-	-	-	-	-
		<u>Winter Demand Reduction (MW)</u>	-	-	-	-	-	-
		<u>Projected Participation</u>	2,100	2,153	2,258	2,310	1,680	10,501
		<u>Energy Savings (MWh)</u>	32	32	34	35	25	158
<u>Customer Education: Shorter Showers</u>	<u>N/A</u>	<u>Summer Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Winter Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Projected Participation</u>	2,100	2,153	2,258	2,310	1,680	10,501
		<u>Energy Savings (MWh)</u>	74	75	79	81	59	368
<u>Customer Education: Wash Laundry in Cold Water</u>	<u>N/A</u>	<u>Summer Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Winter Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Projected Participation</u>	2,100	2,153	2,258	2,310	1,680	10,501
		<u>Energy Savings (MWh)</u>	74	75	79	81	59	368
HVAC Systems: PTAC	2.2.1	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
HVAC Systems: PTHP	2.2.1	Energy Savings (MWh) ²	116-140	123-144	123-151	123-154	116-112	600-701
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	33-40	35-41	35-43	35-44	33-32	171-200
<u>Low-Flow Faucet Aerators: Kit</u>	<u>2.3.6</u>	<u>Energy Savings (MWh)</u>	0	0	0	0	0	0
		<u>Summer Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Winter Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Projected Participation</u>	1	1	1	1	1	5
<u>Low-Flow Showerheads: Kit</u>	<u>2.3.7</u>	<u>Energy Savings (MWh)</u>	0	0	0	0	0	0
		<u>Summer Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Winter Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Projected Participation</u>	1	1	1	1	1	5
<u>Advanced Power Strips: Kit</u>	<u>2.5.1</u>	<u>Energy Savings (MWh)</u>	0	0	0	0	0	0
		<u>Summer Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Winter Demand Reduction (MW)</u>	0.0	0.0	0.0	0.0	0.0	0.0
		<u>Projected Participation</u>	1	1	1	1	1	5
Connected Smart Thermostat	<u>LS002Load Shifting Measure</u>	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.1	0.2
		Winter Demand Reduction (MW)	0.1	2.0-0.1	2.1-0.1	2.2-0.1	2.4-0.1	8.8-0.5

		Projected Participation- ³	945	1,011	1,081	1,157	1,238	5,432
Bring Your Own Thermostat (Enrollment Incentive)	LS001 Load Shifting Measure	Energy Savings (MWh)- ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation- ³	100	-	-	-	-	100
Bring Your Own Thermostat	LS002 Load Shifting Measure	Energy Savings (MWh)- ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation- ³	100	100	100	100	100	500
ASHRAE Level 2 Audit	Audit01 Audit	Energy Savings (MWh)- ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation- ³	4	4	4	4	4	20
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam	2.6.2	Energy Savings (MWh)- ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	1	1	1	1	1	5
Residential New Construction	2.7.1	Energy Savings (MWh)- ²	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	1	1	1	1	1	5
ENERGY STAR Manufactured Homes	2.7.2	Energy Savings (MWh)- ²	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	1	1	1	1	1	5
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit	2.6.2	Energy Savings (MWh)- ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	1	1	1	1	1	5
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation	2.6.3	Energy Savings (MWh)- ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation- ³	1	1	1	1	1	5
Lighting Retrofits - Low Bays	3.1.1	Energy Savings (MWh)- ²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

		Projected Participation ⁻³	1	1	1	1	1	5
		Energy Savings (MWh) ⁻²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	~~5.3~~ 0.0	~~5.5~~ 0.0	~~4.8~~ 0.0	~~4.4~~ 0.0	~~20.0~~ 0.0
		Projected Participation ⁻³	1	1	1	1	1	5
Lighting Retrofits - High Bays	3.1.1							

Estimated Program Budget (Total) by Year

Table 22. Residential Low-Income Subprogram Budget

Residential Low-Income							
Total Budget (\$000)		\$10,870	\$11,028	\$11,394	\$11,754	\$10,160	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$855	\$855	\$855	\$855	\$855	\$4,273
	Direct-Install Materials & Labor	\$6,442	\$6,589	\$6,926	\$7,256	\$5,787	\$33,000
	Braided Funding Support Labor	\$19	\$19	\$19	\$19	\$19	\$96
	Incentive Total	\$7,850	\$7,995	\$8,334	\$8,667	\$7,194	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other-(Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167
Percent Incentives		77	72	72	73	74	71

Estimated Percentage of Sector Budget Attributed to the Program

The Residential Low-Income subprogram components offer incentives to customers in the residential sector. The Residential Low-Income subprogram components account for 34.1% of residential sector spending, as well as 4.0% of SCl and 3.7% of LCI spending exclusive of common cost allocation

Table 23. Residential Low-Income Subprogram Summary of EE&C Costs

														(De scri be)
Residential (incl. Low-Incom e)	Low-Incom e Energy Efficiency	~~\$34,330,888~~ <u>34,157,402</u>	\$0	\$0	\$0	~~\$9,219,672~~ <u>9,219,670</u>	~~\$3,073,224~~ <u>3,073,225</u>	\$0	\$0	\$0	~~\$46,623,78~~ <u>446,450,29</u> <u>7</u>	~~\$646,730~~	\$157	~~\$3,886,241~~ <u>4,614,121</u>
SCI	Low-Incom e Energy Efficiency	~~\$2,854,674~~ <u>2,941,417</u>	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	~~\$4,291,574~~ <u>4,378,317</u>	~~\$472,488~~	~~\$2321~~	~~\$3,400,476~~ <u>2,687,652</u>
LCI	Low-Incom e Energy Efficiency	~~\$2,854,674~~ <u>2,941,417</u>	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	~~\$4,291,574~~ <u>4,378,317</u>	~~\$472,488~~	~~\$2321~~	~~\$3,400,476~~ <u>2,687,652</u>
Sector Totals	Low-Incom e Energy Efficiency	\$40,040,235	\$0	\$0	\$0	~~\$11,375,02~~ <u>211,375,02</u> <u>0</u>	~~\$3,791,674~~ <u>3,791,675</u>	\$0	\$0	\$0	~~\$55,206,93~~ <u>155,206,93</u> <u>0</u>	~~\$624,692~~	~~\$138,136~~	~~\$3,816,976~~ <u>4,308,555</u>

Cost-Effectiveness

Table 24. Residential Low-Income Subprogram TRC Benefits (Gross)

Low-Income	PY18	1.00	~~1.37~~ <u>1.35</u>	~~\$7,850~~ <u>7,981</u>	~~\$3,176~~ <u>1,874</u>	\$3,020	~~\$14,047~~ <u>12,875</u>	~~\$3,467~~ <u>3,273</u>	~~\$13,312~~ <u>12,094</u>	~~\$2,477~~ <u>1,980</u>	\$0	~~\$19,257~~ <u>17,347</u>
Low-Income	PY19	1.00	~~1.37~~ <u>1.35</u>	~~\$7,995~~ <u>8,152</u>	~~\$3,174~~ <u>1,837</u>	\$3,033	~~\$14,202~~ <u>13,022</u>	~~\$3,292~~ <u>3,112</u>	~~\$13,638~~ <u>12,395</u>	~~\$2,530~~ <u>2,022</u>	\$0	~~\$19,460~~ <u>17,529</u>
Low-Income	PY20	1.00	~~1.36~~ <u>1.33</u>	~~\$8,334~~ <u>8,493</u>	~~\$3,124~~ <u>1,769</u>	\$3,060	~~\$14,519~~ <u>13,322</u>	~~\$3,301~~ <u>3,124</u>	~~\$13,777~~ <u>12,531</u>	~~\$2,612~~ <u>2,090</u>	\$0	~~\$19,691~~ <u>17,745</u>
Low-Income	PY21	1.00	~~1.31~~ <u>1.29</u>	~~\$8,667~~ <u>8,691</u>	~~\$3,080~~ <u>1,728</u>	\$3,087	~~\$14,834~~ <u>13,506</u>	~~\$3,254~~ <u>3,056</u>	~~\$13,550~~ <u>12,184</u>	~~\$2,699~~ <u>2,141</u>	\$0	~~\$19,503~~ <u>17,381</u>
Low-Income	PY22	1.00	~~1.27~~ <u>1.23</u>	~~\$7,194~~ <u>6,722</u>	~~\$3,261~~ <u>2,140</u>	\$2,966	~~\$13,421~~ <u>11,828</u>	~~\$2,748~~ <u>2,508</u>	~~\$11,787~~ <u>10,091</u>	~~\$2,548~~ <u>1,952</u>	\$0	~~\$17,083~~ <u>14,551</u>
Low-Income Total		1.00		\$40,040	~~\$15,816~~ <u>9,347</u>	\$15,167	~~\$71,023~~ <u>64,554</u>	~~\$16,063~~ <u>15,072</u>	~~\$66,064~~ <u>59,294</u>	~~\$12,867~~ <u>10,186</u>	\$0	~~\$94,994~~ <u>84,552</u>

Table 25. Residential Low-Income Subprogram TRC Benefits (Net)

Low-Income	PY18	1.000	~~1.37~~ <u>1.35</u>	~~\$7,850~~ <u>7,981</u>	~~\$3,176~~ <u>1,874</u>	\$3,020	~~\$14,047~~ <u>12,875</u>	~~\$3,467~~ <u>3,273</u>	~~\$13,312~~ <u>2,094</u>	~~\$2,477~~ <u>1,980</u>	\$0	~~\$19,257~~ <u>17,347</u>
Low-Income	PY19	1.000	~~1.37~~ <u>1.35</u>	~~\$7,995~~ <u>8,152</u>	~~\$3,174~~ <u>1,837</u>	\$3,033	~~\$14,202~~ <u>13,022</u>	~~\$3,292~~ <u>3,112</u>	~~\$13,638~~ <u>2,395</u>	~~\$2,530~~ <u>2,022</u>	\$0	~~\$19,460~~ <u>17,529</u>
Low-Income	PY20	1.000	~~1.36~~ <u>1.33</u>	~~\$8,334~~ <u>8,493</u>	~~\$3,124~~ <u>1,769</u>	\$3,060	~~\$14,519~~ <u>13,322</u>	~~\$3,301~~ <u>3,124</u>	~~\$13,777~~ <u>2,531</u>	~~\$2,612~~ <u>2,090</u>	\$0	~~\$19,691~~ <u>17,745</u>
Low-Income	PY21	1.000	~~1.31~~ <u>1.29</u>	~~\$8,667~~ <u>8,691</u>	~~\$3,080~~ <u>1,728</u>	\$3,087	~~\$14,834~~ <u>13,506</u>	~~\$3,254~~ <u>3,056</u>	~~\$13,550~~ <u>2,184</u>	~~\$2,699~~ <u>2,141</u>	\$0	~~\$19,503~~ <u>17,381</u>
Low-Income	PY22	1.000	~~1.27~~ <u>1.23</u>	~~\$7,194~~ <u>6,722</u>	~~\$3,261~~ <u>2,140</u>	\$2,966	~~\$13,421~~ <u>11,828</u>	~~\$2,748~~ <u>2,508</u>	~~\$11,787~~ <u>1,091</u>	~~\$2,548~~ <u>1,952</u>	\$0	~~\$17,083~~ <u>14,551</u>
Low-Income Total		1.000		~~\$40,040~~	~~\$15,816~~ <u>9,347</u>	\$15,167	~~\$71,023~~ <u>64,554</u>	~~\$16,063~~ <u>15,072</u>	~~\$66,064~~ <u>59,294</u>	~~\$12,867~~ <u>10,186</u>	\$0	~~\$94,994~~ <u>84,552</u>

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings. Additionally, PECO will implement focused marketing and incentive structures to reach historically underserved populations, aligning with Act 129 equity objectives and promoting broad participation across all customer segments.

Other Information Deemed Appropriate

~~Not applicable.~~

Within 180 days of the start of Phase V PECO will add information to the existing CAP Maximum Credit Notification letters sent to CAP customers about how customers can access PECO's website to obtain information regarding Act 129 energy efficiency measures available to low-income customers. PECO will to coordinate with Community-Based Organizations (CBOs) in its service territory to provide training and materials regarding Act 129 Low-Income Subprogram offerings.

Residential Low-Income HER Subprogram (2026-2031)

The Residential HER Program includes a specified subprogram for low-income customers. Section 3.2 describes the Residential (market rate) HER program and the Low-Income HER subprogram is described below. PECO will not count savings generated by the Low-Income HER Subprogram towards the Phase V low-income carveout.

Objectives

The Low-Income HER subprogram objective is to reduce a home's energy use through HERs and online access where customers can view their home energy usage. This program leverages the power of social norming to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market for the Low-Income HER subprogram includes all PECO residential electric customers with a household income of less than or equal to 150% of the federal poverty level.

Program Description

The Low-Income HER subprogram involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations (including low- or no-cost tips) based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor comparison). The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The website's purpose is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Low-Income HER subprogram will also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP will provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (any why it matters). Communications will include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP will promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Low-Income HER subprogram does not contain any components.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

A CSP will implement the Low-Income HER subprogram. The CSP will deliver direct mail or digital HERs to customers. It will also manage the website platform.

Program Issues and Risks and Risk Mitigation

The Low-Income HER subprogram will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Low-Income HER subprogram have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

Minimal ramp up will be needed for the Low-Income HER subprogram because this program is already operating in Phase IV.

Marketing Strategy

The Low-Income HER subprogram participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

Table 26. Residential Low-Income HER Subprogram

Low-Income Home Energy Reports	per home	Yes	Yes	Phase V TRM	-	4	-

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Low-Income HER subprogram.

Maximum Deadlines for Rebates

Rebates are not applicable to the Low-Income HER subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The program will launch.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Low-Income HER subprogram after meeting its low-income carve-out subject to the Commission-approved budget for the Low-Income HER subprogram.

Assumed EM&V

See Residential HER Program Assumed EM&V in Section 3.2

Administrative Requirements

PECO will administer the Low-Income HER subprogram through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Savings Projections

Table 27. Residential Low-Income HER Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
~~Low-Income~~ Low-Income Home Energy Reports	2.7.3	Energy Savings (MWh)	~~1,813~~ 1,815	~~1,813~~ 1,813	~~1,813~~ 1,813	~~1,813~~ 1,813	~~1,813~~ 1,813	~~9,063~~ 9,063
		Summer Demand Reduction (MW)	~~0.1~~ 0.4	~~0.1~~ 0.2	~~0.1~~ 0.2	~~0.1~~ 0.2	~~0.1~~ 0.2	~~0.5~~ 1.1
		Winter Demand Reduction (MW)	~~0.2~~ 0.3	0.2	0.2	0.2	0.2	~~0.9~~ 1.0
		Projected Participation	3,000	3,000	3,000	3,000	3,000	15,000

Estimated Program Budget (Total) by Year

Table 28. Residential Low-Income HER Subprogram Budget

Low-Income HER							
Total Budget (\$000)		\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$172	\$91	\$95	\$85	\$81	\$524
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Low-Income HER program participates in the residential sector. The Low-Income HER program accounts for 0.4% of residential sector spending exclusive of common cost allocation.

Table 29. Residential Low-Income HER Subprogram Budget

<i>(Describe)</i>														
Residential Portfolio (incl. Low-Income)	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339

Cost-Effectiveness

Table 30. Residential Low-Income HER Subprogram TRC Benefits (Gross)

<i>Low-Income</i>	<i>PY18</i>	<i>1.00</i>	<i>7.78</i>	<i>\$0</i>	<i>\$0</i>	<i>\$172</i>	<i>\$172</i>	<i>\$299</i>	<i>\$1,041</i>	<i>\$0</i>	<i>\$0</i>	<i>\$1,340</i>
<i>Low-Income</i>	<i>PY19</i>	<i>1.00</i>	<i>7.18</i>	<i>\$0</i>	<i>\$0</i>	<i>\$91</i>	<i>\$91</i>	<i>\$139</i>	<i>\$512</i>	<i>\$0</i>	<i>\$0</i>	<i>\$651</i>
<i>Low-Income</i>	<i>PY20</i>	<i>1.00</i>	<i>6.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$95</i>	<i>\$95</i>	<i>\$130</i>	<i>\$517</i>	<i>\$0</i>	<i>\$0</i>	<i>\$648</i>
<i>Low-Income</i>	<i>PY21</i>	<i>1.00</i>	<i>6.31</i>	<i>\$0</i>	<i>\$0</i>	<i>\$85</i>	<i>\$85</i>	<i>\$109</i>	<i>\$427</i>	<i>\$0</i>	<i>\$0</i>	<i>\$536</i>
<i>Low-Income</i>	<i>PY22</i>	<i>1.00</i>	<i>6.12</i>	<i>\$0</i>	<i>\$0</i>	<i>\$81</i>	<i>\$81</i>	<i>\$94</i>	<i>\$400</i>	<i>\$0</i>	<i>\$0</i>	<i>\$494</i>
<i>Low-Income Total</i>		<i>1.00</i>	<i>7.01</i>	<i>\$0</i>	<i>\$0</i>	<i>\$524</i>	<i>\$524</i>	<i>\$772</i>	<i>\$2,897</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,669</i>

Table 31. Residential Low-Income HER Subprogram TRC Benefits (Net)

Low-Income HER	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income HER	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income HER	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income HER	PY21	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income HER	PY22	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income HER Total		1.000	7.01	\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669

Summary of Benchmarking Results

As mentioned in Section 3.2~~0~~, PECO conducted benchmarking against similar utilities to inform ~~its~~ budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Low-Income HER subprogram, PECO will continue to engage existing customers, enroll additional interested customers, and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

Plan to Meet Proportional Number of Measure Requirement

As part of Phase V program design, PECO confirmed that the Phase V Final Order requirement to set low-income measures at 8.8% was incorporated into its CSP plans. Throughout the program, PECO will actively monitor this metric to maintain compliance.

Confirmation That All Low-Income Compliance Savings Will Come From ~~Specific~~the Residential Low-Income Programs or Low-Income Verified Participants in Multifamily Housing ProgramsSubprogram

PECO confirms that its low-income compliance savings will ~~either~~ come from the ~~multifamily component, dedicated program~~ Residential Low-Income Subprogram components ~~exclusively for low-income customers, or from the Low-Income HER subprogram~~. PECO will coordinate closely with its Residential CSP to confirm that any low-income compliance savings ~~from the multifamily program component~~ are fully verified with participant eligibility confirmed.

Estimate of Applicable Low-Income Carryover Savings From Phase IV

PECO estimates that the low-income savings carryover is 22,295 MWh. The Phase IV compliance goal is 80,089 MWh, and with actual savings of 92,284 MWh with a remaining forecast of 10,780 MWh in PY17.³⁰

3.3 Commercial/Industrial Small Sector

While the SWE separated the C&I sector into small (Section 3.3) and large (Section 3.4) in the Plan template, PECO's Plan has one Non-Residential program in the C&I sector. The Non-Residential program serves both SCI and LCI customers. Section 3.4 includes formatted descriptions of the Non-Residential program components.

³⁰ Per Commission Guidance in the EE&C Phase V Final Order, PECO will cap Phase IV low-income carryover to a maximum of 20% of the Phase V low-income compliance target.

3.4 Commercial/Industrial Large Sector

Non-Residential Program (2026-2031)

Objectives

The Non-Residential program objective is to increase energy efficiency for its non-residential customers across the SCI, LCI, and Municipal Lighting²³³¹ rate classes. The program uses the following approaches to achieve this objective including:

- Providing customers with easy access to technical support, incentives, and concierge-style services to facilitate program participation and maximize program benefits
- Allowing small businesses to realize the economic benefits of energy efficiency through comprehensive energy efficiency solutions
- Encouraging Non-Residential program customers to make upgrades where they need them most by providing rebates for a wide range of measures

Target Market

PECO's non-residential electric customers include commercial, industrial, government, education, and nonprofit customers. Below are definitions of PECO's SCI and LCI rate classes. At the time of this Plan development, the SCI market size includes approximately 170,000 customers and the LCI market includes approximately 3,000 customers.

SCI rate classes include:

- Rate GS (General Service)

LCI rate classes include:

- Rate PD (Primary Distribution Power)
- Rate HT (High Tension Power)
- Rate EP (Electric Propulsion)

Municipal Lighting rate classes include:

- Rate SL-E (Street Lighting Customer-Owned Facilities)
- Rate SL-C (Smart Lighting Controls Customer-Owned Facilities)
- Rate AL (Alley Lighting in City of Philadelphia)

²³³¹ The municipal lighting rate class includes streetlighting measures such as pole/arm-mounted roadway or parking lot lighting measures. These measures may be offered to municipalities and homeowner's associations (HOAs) among others.

Program Description

The Non-Residential program offers a comprehensive and cross-cutting array of opportunities so non-residential customers can reduce their energy consumption and costs. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

- **Strategic Energy Management (SEM):** Implements practices, policies, and processes across an organization or facility that create persistent energy savings. Includes the implementation of employee training, new operational protocols, and other interventions that measurably reduce a facility's energy usage.
- **Existing Buildings:** Provides incentives to customers who install energy efficient equipment. Provides downstream and/or midstream incentives for a variety of equipment types including, but not limited to, lighting, HVAC, compressed air, motors and drives.
- **Building Optimization:** Includes assessments and implementing measures to optimize energy use in an existing building. Includes retrocommissioning (RCx), virtual commissioning (VCx), monitoring-based commissioning (MBCx), building tune-up, and Building Operator Certification (BOC) offerings. Additionally, through these assessments, the non-residential CSP will determine whether a customer could benefit from daily load shifting, and implement this savings pathway through the Building Optimization program component.
- **Distributed Energy Resources (DER):** Incentivizes the installation of energy generation and storage systems at customer sites, either behind the meter or with connection to the local grid. This includes, but is not limited to, solar (PV), combined heat and power (CHP), and fuel cell technologies.
- **Small Business Solutions:** Works with small businesses and trade allies to install a prescribed list of energy-saving measures at small business facilities. Includes trade allies who conduct any needed energy assessments and install the eligible measures at customer sites.
- **New Construction:** Partners with design firms and builders to facilitate construction projects (e.g., new facility builds, additions, significant remodels) that are designed, built, and operated at a high level of efficiency from the start. Offers reviews of design documents and onsite assessments for new construction projects, with the implementation of energy-saving measures based on the results.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote and channel customers to other Non-Residential program components based on their facility needs and energy goals.

Implementation Strategy

The Non-Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

- **Strategic Energy Management (SEM):** Delivered through a 12-month cohort model that fosters peer learning, energy awareness, and demand reduction strategies. The CSP will provide comprehensive support including SEM coaches, engineers, and energy modelers. Participants will work with coaches to achieve energy savings through operational and behavioral measures, with additional benefits such as improved safety, sustainability, and facility responsiveness. Participants will graduate out of the component after the first year into the alumni cohort to sustain and expand savings over time.
 - **Virtual SEM (vSEM):** Leverages AMI interval data and analytics to identify savings opportunities remotely and integrate load-shifting strategies to meet peak demand goals.
- **Existing Buildings:** Delivers a comprehensive portfolio of energy efficiency offerings through downstream (including prescriptive and custom offerings) and midstream channels.
 - **Downstream:** focuses on direct customer engagement with technical and trade ally support to facilitate smooth project implementation and timely incentives. The prescriptive pathways will offer streamlined participation and incentives for standard measures, serving as an entry point for engagement. The custom pathway will target complex, site-specific projects including process improvements, chiller plant improvements, compressed air upgrades, load shifting, and more.
 - **Midstream:** reduces barriers by providing instant incentives at the point of sale through distributor networks, expanding beyond lighting to HVAC, refrigeration, and other technologies.
- **Building Optimization:** Delivers deep, persistent energy savings through technical rigor, customer empowerment, and strategic collaboration.
 - **Engineering Support and Audits:** Provides customers with direct access to expert engineering support to help identify, evaluate, and implement energy savings opportunities. Includes ASHRAE Level 2 audits and leverages braided funding opportunities to minimize upfront costs and support customer participation.
 - **BOC:** Delivered in partnership with Penn College of Technology, the BOC offering will provide structured Level I and Level II courses for customers to earn nationally recognized credentials and practical skills to manage building energy use. The CSP will conduct post-class facility assessment to reinforce course content and identify additional savings opportunities.
 - **Building Commissioning (RCx, VCx, MBCx):** Identifies operational savings opportunities through an analysis of interval meter data and engages pre-qualified accounts. Participants will implement recommended measures independently, with no onsite support or financing incentives and the CSP will verify savings through meter-based measurement and verification.
 - **Load Shifting:** Focuses on identifying customers who would benefit from a daily load shifting program outside of PECO's peak hours and engages them through additional outreach. Participating customers will realize savings by enrolling in the

program, with performance verified through meter-based measurement and verification methods outlined by the SWE.

- **Distributed Energy Resources (DER):** Focused primarily on solar PV and CHP projects, the CSP will work closely with solar contractors and PECO's interconnection team to implement the component. The CSP will facilitate AEPS registration for eligible projects, provide guidance, and coordinate with PECO and the PA PUC as needed.
- **Small Business Solutions:** Designed to maximize participation, streamline implementation, and deliver savings, this component will include a vetted trade ally network, direct discount services, localized outreach and engagement, streamlined participation tools, robust QA/quality control (QC), and braided funding. This component includes interest free financing to small and medium sized businesses.
- **New Construction:** Embeds energy efficiency into the design and construction process to support new facility builds, additions, and major renovations across commercial, institutional, and industrial sectors. The CSP will provide design-build services, early engagement with design teams, and technical support such as energy modeling, document reviews, and site assessments.

Program Issues and Risks and Risk Mitigation

• Program issues and risks as well as risk mitigation ~~follows~~follow the topics outlined in ~~the~~ Section 3.20. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Non-Residential program have anticipated costs of \$497,226,292 for Phase V after PECO incentives.

Ramp-Up Strategy

The primary objective is to support a smooth, quick, and seamless transition from Phase IV to Phase V, especially from the perspective of customers and market actors. The CSP will align outreach staff with appropriate customer segments and will capitalize on existing relationships to build on success.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. The CSP will employ a multi-channel strategy and use robust analytics to reach PECO's customer market segments and trade allies with services and measures to meet their specific needs. The CSP will leverage online ads, email, in-person events, existing communication channels, and case studies as some of the primary marketing tactics for the Non-Residential program. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Non-Residential program components.

- **Business Intelligence and Market Segmentation:** Looking at past participation by measures and industry, the CSP will create and deploy targeted direct and digital

marketing with measure-specific content to industries that have the greatest propensity to participate in PECO's program.

- **Large Business:** The CSP will implement a data-informed marketing approach to engage large business customers by leveraging customer segmentation and behavioral insights to identify and prioritize large business accounts with the highest potential for impact. The CSP will customize messaging informed by large business customers' challenges and goals to increase participation.
- **Small Business:** The CSP will implement a data-informed marketing strategy to engage small business customers by delivering clear, accessible messaging that highlights the value and ease of participation.
- **Hard-to-Reach and Disadvantaged Small Business Owners:** The CSP will leverage localized, relationship-driven outreach to engage hard-to-reach and disadvantaged small business owners. Outreach will address key barriers including trust, language, awareness, and capacity. The CSP will prioritize direct, in-person engagement through on-site assessment and presence at local events and will collaborate with trusted community organizations and culturally competent trade allies and contractors to reach customers.
- **Trade Allies:** The CSP will support trade allies with sales enablement materials that coordinate with measure-focused campaigns. The CSP will engage and support trade allies through coordinated sales enablement materials aligned with measure-focused campaigns. The CSP will actively recruit trade allies and provide scheduled training and ongoing support to ensure they have the skills and resources necessary to promote the Non-Residential program effectively. Trade allies will serve as key program ambassadors, educating customers on program benefits and driving participation. Continuous communication, mentorship, and field support will be provided to help trade allies enhance their capabilities, maintain high customer satisfaction, and maximize program participation.

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC, water heating, plug load, refrigeration, motors, and others that span all customer classes and building types. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 32. Non-Residential Eligible Measures

		Low-Income Measure (Yes/No)	Comprehensive Low-Income				
Lighting Retrofits - Street lighting	per lighting equipment	No	No	Phase V TRM	\$276.15	15	\$0.00 - \$276.15
Lighting Retrofits - Outdoor floods	per lighting equipment	No	No	Phase V TRM	\$132.70	15	\$0.00 - \$ ~~132.70~~ <u>146.00</u>
Lighting Retrofits - High Bays	per lighting equipment	No	No	Phase V TRM	\$520.03	15	\$0.00 - \$520.03
Lighting Retrofits - Other Interior Fixtures	per lighting equipment	No	No	Phase V TRM	\$104.01	15	\$0.00 - \$104.01
Lighting Controls	per lighting equipment	No	No	Phase V TRM	\$52.67	8	\$0.00 - \$52.67
LED Exit Signs	per sign	No	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
LED Refrigeration Display Case Lighting	per case	No	No	Phase V TRM	~~\$61.00~~ <u>58.68</u>	8	\$0.00 - \$61.00
HVAC Systems: Air Conditioner	per unit	No	No	Phase V TRM	\$6,186.04	15	\$0.00 - \$6,186.04
HVAC Systems: Heat Pump	per unit	No	No	Phase V TRM	\$5,255.65	15	\$0.00 - \$5,255.65
Electric Chillers	per chiller	No	No	Phase V TRM	\$209,116.51	15	\$0.00 - \$209,116.51
Groundwater Source and Ground Source Heat Pumps	per heat pump	No	No	Phase V TRM	\$65,910.57	15	\$0.00 - \$65,910.57
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons	per heat pump	No	No	Phase V TRM	\$1,705.32	15	\$0.00 - \$1,705.32
Small C&I HVAC Refrigerant Charge Correction	per HVAC system	No	No	Phase V TRM	~~\$374.00~~ <u>369.32</u>	3	\$0.00 - \$374.00
HVAC Tune Up	per HVAC system	No	No	Phase V TRM	\$612.90	3	\$0.00 - \$612.90
Room Air Conditioner	per AC	No	No	Phase V TRM	\$408.37	9	\$0.00 - \$408.37
Controls: Guest Room Occupancy Sensor	per sensor	No	No	Phase V TRM	\$342.24	11	\$0.00 - \$342.24
Controls: Economizer	per economizer	No	No	Phase V TRM	~~\$2,027.00~~ <u>45.94</u>	3	\$0.00 - \$2,027.00
Computer Room Air Conditioner	per unit	No	No	Phase V TRM	\$350.00	15	\$0.00 - \$350.00
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	per unit	No	No	Phase V TRM	\$948.00	15	\$0.00 - \$948.00
Computer Room Air Conditioner/Handler VSD on AC Fan Motors	per HP	No	No	Phase V TRM	~~\$1,163.00~~ <u>1.134.00</u>	15	\$0.00 - \$1,163.00

		Low-Income Measure (Yes/No)	Comprehensive Low-Income				
Circulation Fan: High-Volume Low-Speed	per fan	No	No	Phase V TRM	\$4,073.80	15	\$0.00 - \$4,073.80
Demand Controlled Ventilation	per HVAC system	No	No	Phase V TRM	\$1,923.96	15	\$0.00 - \$1,923.96
Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)	per HVAC system	No	No	Phase V TRM	\$1,923.96	10	\$0.00 - \$1,923.96
Advanced Rooftop Controls: DCV with two speed controls	per HVAC system	No	No	Phase V TRM	\$3,339.90	10	\$0.00 - \$3,339.90
Advanced Rooftop Controls: DCV with three speed controls or VFD	per HVAC system	No	No	Phase V TRM	\$3,884.48	10	\$0.00 - \$3,884.48
C&I ENERGY STAR Certified Connected Thermostats	per thermostat	No	No	Phase V TRM	\$168.42	11	\$0.00 - \$168.42
Duct Sealing and Insulation	per project	No	No	Phase V TRM	\$280.64	15	\$0.00 - \$280.64
Chilled Water Pipe Insulation	per insulation project	No	No	Phase V TRM	\$127.76	15	\$0.00 - \$127.76
Premium Efficiency Motors	per motor	No	No	Phase V TRM	~~\$1,034.00~~ <u>934.02</u>	15	\$0.00 - \$1,034.00
Variable Frequency Drive (VFD) Improvements	per drive	No	No	Phase V TRM	~~\$1,216.00~~ <u>175.51</u>	15	\$0.00 - \$1,216.00
ECM Circulating Fan	per fan	No	No	Phase V TRM	\$395.48	5	\$0.00 - \$395.48
VSD on Kitchen Exhaust Fan	per unit	No	No	Phase V TRM	\$533.66	15	\$0.00 - \$533.66
ECM Circulator Pump	per pump	No	No	Phase V TRM	\$402.69	15	\$0.00 - \$402.69
High Efficiency Pumps	per pump	No	No	Phase V TRM	\$2,534.53	13.3	\$0.00 - \$2,534.53
Heat Pump Water Heaters	per water heater	No	No	Phase V TRM	\$1,279.29	10	\$0.00 - \$1,279.29
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs	per sprayer	No	No	Phase V TRM	~~\$193.00~~ <u>127.92</u>	8	\$0.00 - \$193.00
Domestic Hot Water Pipe Insulation	per insulation project	No	No	Phase V TRM	~~\$63.00~~ <u>29.71</u>	15	\$0.00 - \$63.00
ENERGY STAR Refrigeration Cases	per case	No	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
ENERGY STAR Freezer Cases	per case	No	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67

		Low-Income Measure (Yes/No)	Comprehensive Low-Income				
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Cooler	per motor	No	No	Phase V TRM	\$501.84	15	\$0.00 - \$501.84
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer	per motor	No	No	Phase V TRM	\$353.45	15	\$0.00 - \$353.45
Controls: Evaporator Fan Controllers	per controller	No	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Controls: Floating Head Pressure Controls	per control	No	No	Phase V TRM	\$42,514.74	15	\$0.00 - \$42,514.74
Controls: Anti-Sweat Heater Controls	per door	No	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Controls: Evaporator Coil Defrost Control	per defrost control	No	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Variable Speed Refrigeration Compressor	per compressor	No	No	Phase V TRM	\$5,632.92	15	\$0.00 - \$5,632.92
Strip Curtains for Walk-In Freezers and Coolers	per door	No	No	Phase V TRM	\$220.33	4	\$0.00 - ~~\$220.33~~ <u>\$318.00</u>
Night Covers for Display Cases	per case	No	No	Phase V TRM	\$793.14	5	\$0.00 - \$793.14
Auto Closers	per door	No	No	Phase V TRM	\$572.76	8	\$0.00 - \$572.76
Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers	per door	No	No	Phase V TRM	\$2,394.08	12	\$0.00 - \$2,394.08
Suction Pipe Insulation for Walk-In Coolers and Freezers	per insulation project	No	No	Phase V TRM	\$100.75	11	\$0.00 - \$100.75
Refrigerated Display Cases with Doors Replacing Open Cases	per case	No	No	Phase V TRM	\$2,288.38	12	\$0.00 - \$2,288.38
Adding Doors to Existing Refrigerated Display Cases	per case	No	No	Phase V TRM	\$1,816.25	12	\$0.00 - \$1,816.25
Refrigerated Case Light Occupancy Sensors	per controller	No	No	Phase V TRM	\$35.00	8	\$0.00 - \$35.00
Food Service Equipment Novelty Cooler Shutoff	per controller	No	No	Phase V TRM	\$303.26	10	\$0.00 - \$303.26
ENERGY STAR Clothes Washer	per washer	No	No	Phase V TRM	\$676.89	7.1	\$0.00 - \$676.89

		Low-Income-Measure (Yes/No)	Comprehensive Low-Income				
ENERGY STAR Bathroom Ventilation Fan in Commercial Applications	per fan	No	No	Phase V TRM	\$300.13	12	\$0.00 - \$300.13
ENERGY STAR Ice Machines	per machine	No	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Controls: Beverage and Snack Machine Controls	per control	No	No	Phase V TRM	\$234.30	5	\$0.00 - \$234.30
ENERGY STAR Electric Steam Cooker	per cooker	No	No	Phase V TRM	~~\$441.00~~ 422.93	12	\$0.00 - \$441.00
ENERGY STAR Combination Oven	per oven	No	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48
ENERGY STAR Commercial Fryer	per fryer	No	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55
ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
ENERGY STAR Commercial Dishwasher	per dishwasher	No	No	Phase V TRM	~~\$1,418.00~~ 1,093.46	10	\$0.00 - \$1,418.00
ENERGY STAR Commercial Griddle	per griddle	No	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Commercial Induction Cooktops	per cooktop	No	No	Phase V TRM	\$1,511.88	10	\$0.00 - \$1,511.88
Wall and Ceiling Insulation	per project	No	No	Phase V TRM	\$9,235.20	20	\$0.00 - \$9,235.20
Advanced Power Strips	per power strip	No	No	Phase V TRM	\$56.50	5	\$0.00 - \$56.50
ENERGY STAR Servers	per data center	No	No	Phase V TRM	\$1,259,232.00	4	\$0.00 - \$1,259,232.00
Server Virtualization	per server	No	No	Phase V TRM	~~\$895.00~~ 272.22	4	\$0.00 - \$895.00
Cycling Refrigerated Thermal Mass Dryer	per dryer	No	No	Phase V TRM	\$196.56	10	\$0.00 - \$196.56
Air-Entraining Air Nozzle	per nozzle	No	No	Phase V TRM	\$159.25	15	\$0.00 - ~~\$159.25~~ 160.00
No-Loss Condensate Drains	per drain	No	No	Phase V TRM	\$308.18	10	\$0.00 - \$308.18
Air Tanks for Load/No Load Compressors	per receiver tank addition	No	No	Phase V TRM	\$501.22	15	\$0.00 - \$501.22
Variable-Speed Drive Air Compressor	per compressor	No	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09

		Low-Income-Measure- (Yes/No)	Comprehensive Low-Income				
Compressed Air Controller	per controller	No	No	Phase V TRM	\$177.49	13	\$0.00 - \$177.49
Compressed Air Low Pressure Drop Filters	per filter	No	No	Phase V TRM	\$1,040.00	10	\$0.00 - \$1,040.00
Compressed Air Mist Eliminators	per air mist eliminator	No	No	Phase V TRM	\$37.89	5	\$0.00 - \$37.89
Engine Block Heater Timer	per heater timer	No	No	Phase V TRM	~~\$76.00~~ 16.64	15	\$0.00 - \$76.00
High Frequency Battery Chargers	per charger	No	No	Phase V TRM	\$402.48	15	\$0.00 - \$402.48
Uninterruptible Power Supply (UPS)	per UPS	No	No	Phase V TRM	\$46.80	7	\$0.00 - \$46.80
Automatic Milker Takeoffs	per milker takeoff system	No	No	Phase V TRM	\$20,000.00	10	\$0.00 - \$20,000.00
Dairy Scroll Compressors	per compressor	No	No	Phase V TRM	~~\$1,182.00~~ 557.44	15	\$0.00 - \$1,182.00
High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Heat Reclaimers	per heat reclaimer system	No	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
High Volume Low Speed Fans	per fan	No	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Livestock Waterer	per livestock waterer system	No	No	Phase V TRM	\$552.98	10	\$0.00 - \$552.98
Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Low Pressure Irrigation System	per irrigation system	No	No	Phase V TRM	\$3,000.00	5	\$0.00 - \$3,000.00
New Construction Lighting	Per Project	No	No	Phase V TRM	\$188,000.00	15	\$0.00 - \$188,000.00
Indoor Horticultural Lighting	per lighting equipment	No	No	Phase V TRM	~~\$164.00~~ 137.50	7	\$0.00 - \$164.00
High Efficiency Transformer	per transformer	No	No	Phase V TRM	\$468.00	15	\$0.00 - \$468.00
Midstream lighting incentives - Street lighting	per lighting equipment	No	No	Phase V TRM	\$85.86	15	\$0.00 - \$85.86
Midstream lighting incentives: Outdoor floods	per lighting equipment	No	No	Phase V TRM	\$42.75	15	\$0.00 - \$42.75
Midstream lighting incentives: High Bays	per lighting equipment	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00

		Low-Income Measure (Yes/No)	Comprehensive Low-Income				
Midstream lighting incentives: Other Interior Fixtures	per lighting equipment	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00
HVAC Systems for Midstream Delivery: Air Conditioner	per unit	No	No	Phase V TRM	\$912.78	15	\$0.00 - \$912.78
HVAC Systems for Midstream Delivery: Heat Pump	per unit	No	No	Phase V TRM	\$4,824.01	15	\$0.00 - \$4,824.01
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons for Midstream Delivery	per heat pump	No	No	Phase V TRM	\$2,273.76	15	\$0.00 - \$2,273.76
Midstream Indoor Horticultural Lighting	per lighting equipment	No	No	Phase V TRM	~~\$300.00~~ 137.50	7	\$0.00 - \$300.00
Midstream Premium Efficiency Motors	per motor	No	No	Phase V TRM	~~\$1,000.00~~ 934.02	15	\$0.00 - \$1,000.00
Midstream Variable Frequency Drive (VFD) Improvements	per drive	No	No	Phase V TRM	\$2,027.14	15	\$0.00 - \$2,027.14
Midstream ENERGY STAR Refrigeration Cases	per case	No	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
Midstream ENERGY STAR Freezer Cases	per case	No	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67
Midstream Controls: Evaporator Fan Controllers	per controller	No	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Midstream Controls: Anti-Sweat Heater Controls	per door	No	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Midstream Controls: Evaporator Coil Defrost Control	per defrost control	No	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Midstream ENERGY STAR Ice Machines	per machine	No	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Midstream ENERGY STAR Electric Steam Cooker	per cooker	No	No	Phase V TRM	~~\$1,500.00~~ 422.93	12	\$0.00 - \$1,500.00
Midstream ENERGY STAR Combination Oven	per oven	No	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
Midstream ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48

		Low-Income-Measure (Yes/No)	Comprehensive Low-Income				
Midstream ENERGY STAR Commercial Fryer	per fryer	No	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
Midstream ENERGY STAR Commercial Dishwasher	per dishwasher	No	No	Phase V TRM	\$1,093.46	10	\$0.00 - \$1,093.46
Midstream ENERGY STAR Commercial Griddle	per griddle	No	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Midstream Air Tanks for Load/No Load Compressors	per receiver tank addition	No	No	Phase V TRM	~~\$1,750.00~~ 501.22	15	\$0.00 - \$1,750.00
Midstream Variable-Speed Drive Air Compressor	per compressor	No	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09
Midstream High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Midstream Heat Reclaimers	per heat reclaimer system	No	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
Midstream High Volume Low Speed Fans	per fan	No	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Building Operator Certification Training	per building tune up	No	No	Phase V TRM	\$4,298.77	13	\$0.00 - \$4,298.77
Custom:Other - SEM	Per Participant	No	No	Phase V TRM	\$50,000.00	15	\$0.00 - \$50,000.00
Custom:Other - VCx	Per Participant	No	No	Phase V TRM	\$31,282.01	15	\$0.00 - \$31,282.01
Custom:Other - vSEM	Per Participant	No	No	Phase V TRM	\$10,000.00	15	\$0.00 - \$10,000.00
Solar	per project	No	No	Phase V TRM	\$297,602.20	15	\$0.00 - \$297,602.20
Custom:Other - Compressed Air	Per Participant	No	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Data Center	Per Participant	No	No	Phase V TRM	\$100,000.00	15	\$0.00 - \$100,000.00
Custom:HVAC Custom:HVAC	Per Participant	No	No	Phase V TRM	\$113,365.00	15	\$0.00 - \$113,365.00

		Low-Income-Measure (Yes/No)	Comprehensive Low-Income				
Custom: Motors & Drives	Per Participant	No	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Other	Per Participant	No	No	Phase V TRM	\$124,715.00	15	\$0.00 - \$124,715.00
Custom: Process	Per Participant	No	No	Phase V TRM	\$200,000.00	15	\$0.00 - \$200,000.00
Custom: Refrigeration	Per Participant	No	No	Phase V TRM	\$60,585.00	15	\$0.00 - \$60,585.00
Custom: EMS	Per Participant	No	No	Phase V TRM	\$25,000.00	15	\$0.00 - \$25,000.00
Custom: Retrocommissioning	Per Participant	No	No	Phase V TRM	\$173,280.00	15	\$0.00 - \$173,280.00
Custom: CHP	Per Participant	No	No	Phase V TRM	\$5,710,026.00	15	\$0.00 - \$5,710,026.00
ASHRAE Audits/Feasibility Studies	Per Participant	No	No	Phase V TRM	~~\$18,000.00~~ 10,000.00	5	\$0.00 - ~~\$18,000.00~~ 25,000.00
Incentive Buy Down	Per Participant	No	No	Phase V TRM	\$15,000.00	5	\$0.00 - ~~\$15,000.00~~ 18,000.00
C&I Load Shifting	per unit	No	No	Phase V TRM	\$200,000.00	1	\$0.00 - \$200,000.00
Lighting Retrofits – Street lighting	per lighting-equipment	No	No	Phase V TRM	\$276.15	15	\$0.00 – \$276.15

To maximize opportunities for customer energy savings, PECO reserves the right to offer an incentive of up to the incremental measure costs²⁴³² for any measure that is not listed in Table 32 but is identified in the TRM or approved as an interim measure protocol.

²⁴³² The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here Total Resource Cost Test | PA PUC

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation. Incentives can cover up to 80% of project costs for qualifying measures, reducing ROI periods to 1–5 years and helping overcome financial barriers. Market response will be monitored, and incentive levels adjusted as needed to maintain competitiveness and momentum. Key program components include:

- **Strategic Energy Management:** Lower incentives due to high personal engagement.
- **Small Business Direct Install:** Full funding of installation costs to eliminate financial barriers.
- **New Construction:** Higher upfront incentives to integrate energy efficiency during design.
- **Existing Buildings:** Higher incentives to encourage participation from customers and contractors.
- **Building Optimization:** Lower incentives, similar to SEM, due to personal engagement.
- **Distributed Energy Resources:** Higher incentives due to expensive, complex measure types.

PECO will implement a range of incentive strategies. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted as any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems, and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have five FTEs dedicated to the non-residential sector.

Savings Projections and Participation

Table 33. Non-Residential Estimated Savings and Participation

Lighting Retrofits - Street lighting	3.1.1	Energy Savings (MWh) ⁻²	6,060	7,4836,744	8,1537,348	7,4836,744	6,0605,462	35,23932,358
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	763.30.8	942.50.8	1,026.80.9	942.50.8	763.30.7	4,438.44.1
		Projected Participation ⁻³	5,990	7,3966,666	8,0587,263	7,3966,666	5,9905,398	34,83031,983
Lighting Retrofits - Outdoor floods	3.1.1	Energy Savings (MWh) ⁻²	6,142	10,9409,846	6,4195,777	6,3645,725	6,1425,528	36,00333,017
		Summer Demand Reduction (MW)	226.10.2	402.70.4	236.30.2	234.20.2	226.10.2	1,325.51.2
		Winter Demand Reduction (MW)	862.40.9	1,579.91.4	947.60.8	941.40.8	900.90.8	5,232.34.6
		Projected Participation ⁻³	6,711	11,95310,758	7,0146,313	6,9506,255	6,7116,040	39,33936,076
Lighting Retrofits - High Bays	3.1.1	Energy Savings (MWh) ⁻²	31,344	38,02034,218	39,38735,448	34,13130,718	31,34428,209	174,226159,937
		Summer Demand Reduction (MW)	5,748.05.7	6,972.46.3	7,223.16.5	6,259.35.6	5,748.05.2	31,950.929.3
		Winter Demand Reduction (MW)	4,387.44.4	5,322.04.8	5,513.45.0	4,777.74.3	4,387.53.9	24,388.122.4
		Projected Participation ⁻³	24,183	29,33426,401	30,38927,350	26,33423,701	24,18321,765	134,423123,399
Lighting Retrofits - Other Interior Fixtures	3.1.1	Energy Savings (MWh) ⁻²	18,299	21,73419,560	24,47222,025	21,73419,560	18,29916,469	104,53795,913
		Summer Demand Reduction (MW)	3,358.43.4	3,988.83.6	4,491.44.0	3,988.83.6	3,358.43.0	19,185.817.6
		Winter Demand Reduction (MW)	2,566.92.6	3,055.62.7	3,440.13.1	3,056.32.7	2,572.92.3	14,691.913.5
		Projected Participation ⁻³	198,080	235,264211,738	264,907238,416	235,264211,738	198,080178,272	1,131,5951,038,244
Lighting Controls	3.1.3	Energy Savings (MWh) ⁻²	76	153138	175158	157141	127115	688627
		Summer Demand Reduction (MW)	14.20.0	28.60.0	32.70.0	29.30.0	23.80.0	128.60.1
		Winter Demand Reduction (MW)	10.50.0	21.20.0	24.30.0	21.70.0	17.70.0	95.40.1
		Projected Participation ⁻³	629	1,2651,139	1,4491,304	1,2991,169	1,055950	5,6975,190
LED Exit Signs	3.1.4	Energy Savings (MWh) ⁻²	44	4137	4440	3431	2422	187174
		Summer Demand Reduction (MW)	5.70.0	5.30.0	5.70.0	4.40.0	3.20.0	24.20.0
		Winter Demand Reduction (MW)	4.00.0	7.50.0	8.00.0	7.30.0	5.60.0	32.30.0
		Projected Participation ⁻³	152	142129	152139	118107	8577	649604
LED Refrigeration Display Case Lighting	3.1.5	Energy Savings (MWh) ⁻²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.20.0	0.20.0
		Winter Demand Reduction (MW)	-	-	-	-	0.20.0	0.20.0
		Projected Participation ⁻³	-	-	-	-	2	2
HVAC Systems: Air Conditioner	3.2.1	Energy Savings (MWh) ⁻²	15	8	11	8	11	53
		Summer Demand Reduction (MW)	8.60.0	4.30.0	6.50.0	4.30.0	6.50.0	30.20.0

		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	8	4	6	4	6	28
HVAC Systems: Heat Pump	3.2.1	Energy Savings (MWh) ⁻²	11	19	37	45	56	168
		Summer Demand Reduction (MW)	4.00.0	6.70.0	13.50.0	16.20.0	20.20.0	60.70.1
		Winter Demand Reduction (MW)	3.20.0	5.30.0	10.60.0	12.70.0	15.90.0	47.60.0
		Projected Participation ⁻³	3	5	10	12	15	45
		Energy Savings (MWh) ⁻²	110	66	176	44	44	440
Electric Chillers	3.2.3	Summer Demand Reduction (MW)	54.80.1	32.90.0	87.70.1	21.90.0	21.90.0	219.30.2
		Winter Demand Reduction (MW)	2.20.0	1.30.0	3.50.0	0.90.0	0.90.0	8.80.0
		Projected Participation ⁻³	5	3	8	2	2	20
		Energy Savings (MWh) ⁻²	5	-	2	2	-	9
Groundwater Source and Ground Source Heat Pumps	3.2.4	Summer Demand Reduction (MW)	3.40.0	-	1.70.0	1.70.0	-	6.80.0
		Winter Demand Reduction (MW)	2.60.0	-	1.30.0	1.30.0	-	5.20.0
		Projected Participation ⁻³	2	-	1	1	-	4
		Energy Savings (MWh) ⁻²	292	565	749	624	412	2,640
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons	3.2.5	Summer Demand Reduction (MW)	212.70.2	411.40.4	545.60.5	454.40.5	300.00.3	1,924.01.9
		Winter Demand Reduction (MW)	162.60.2	314.50.3	417.40.4	347.40.3	229.30.2	1,470.91.5
		Projected Participation ⁻³	168	325	431	359	237	1,520
		Energy Savings (MWh) ⁻²	7	-	7	-	-	15
Small C&I HVAC Refrigerant Charge Correction	3.2.7	Summer Demand Reduction (MW)	3.80.0	-	3.80.0	-	-	7.60.0
		Winter Demand Reduction (MW)	0.10.0	-	0.10.0	-	-	0.30.0
		Projected Participation ⁻³	2	-	2	-	-	4
		Energy Savings (MWh) ⁻²	64	263	297	263	229	1,115
HVAC Tune Up	3.2.8	Summer Demand Reduction (MW)	32.80.0	135.00.1	152.60.2	135.00.1	117.90.1	573.40.6
		Winter Demand Reduction (MW)	13.10.0	53.80.1	60.80.1	53.80.1	47.00.0	228.50.2
		Projected Participation ⁻³	155	638	721	638	557	2,709
		Energy Savings (MWh) ⁻²	0	0	-	0	-	0
Room Air Conditioner	3.2.9	Summer Demand Reduction (MW)	0.10.0	0.10.0	-	0.10.0	-	0.30.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	2	1	-	1	-	4
		Energy Savings (MWh) ⁻²	1	1	1	0	0	3
Controls: Guest Room Occupancy Sensor	3.2.10	Summer Demand Reduction (MW)	0.20.0	0.20.0	0.20.0	0.10.0	0.10.0	0.70.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.10.0
		Projected Participation ⁻³	4	5	5	3	2	19
		Energy Savings (MWh) ⁻²	1	1	1	0	0	3

Controls: Economizer	3.2.11	Energy Savings (MWh) ⁻²	-	-	-	20	59	79
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	-	-	1	3	4
Computer Room Air Conditioner	3.2.12	Energy Savings (MWh) ⁻²	-	-	14	-	14	27
		Summer Demand Reduction (MW)	-	-	3.80.0	-	3.80.0	7.60.0
		Winter Demand Reduction (MW)	-	-	3.80.0	-	3.80.0	7.60.0
		Projected Participation ⁻³	-	-	6	-	6	12
Computer Room Air Conditioner/Handle r Electronically Commutated Plug Fans	3.2.13	Energy Savings (MWh) ⁻²	-	-	-	-	18	18
		Summer Demand Reduction (MW)	-	-	-	-	2.30.0	2.30.0
		Winter Demand Reduction (MW)	-	-	-	-	2.30.0	2.30.0
		Projected Participation ⁻³	-	-	-	-	2	2
Computer Room Air Conditioner/Handle r VSD on AC Fan Motors	3.2.14	Energy Savings (MWh) ⁻²	-	-	-	-	23	23
		Summer Demand Reduction (MW)	-	-	-	-	2.80.0	2.80.0
		Winter Demand Reduction (MW)	-	-	-	-	2.80.0	2.80.0
		Projected Participation ⁻³	-	-	-	-	2	2
Circulation Fan: High-Volume Low-Speed	3.2.15	Energy Savings (MWh) ⁻²	39	44	44	39	29	194
		Summer Demand Reduction (MW)	20.00.0	22.50.0	22.50.0	20.00.0	15.00.0	99.80.1
		Winter Demand Reduction (MW)	8.00.0	9.00.0	9.00.0	8.00.0	6.00.0	39.80.0
		Projected Participation ⁻³	8	9	9	8	6	40
Demand Controlled Ventilation	3.2.16	Energy Savings (MWh) ⁻²	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.50.0	0.50.0
		Winter Demand Reduction (MW)	-	-	-	-	0.50.0	0.50.0
		Projected Participation ⁻³	-	-	-	-	4	4
Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)	3.2.17	Energy Savings (MWh) ⁻²	2	2	-	-	-	4
		Summer Demand Reduction (MW)	1.10.0	1.10.0	-	-	-	2.10.0
		Winter Demand Reduction (MW)	0.40.0	0.40.0	-	-	-	0.80.0
		Projected Participation ⁻³	1	1	-	-	-	2
Advanced Rooftop Controls: DCV with two speed controls	3.2.17	Energy Savings (MWh) ⁻²	-	6	6	-	-	13
		Summer Demand Reduction (MW)	-	3.30.0	3.30.0	-	-	6.50.0
		Winter Demand Reduction (MW)	-	1.30.0	1.30.0	-	-	2.60.0
		Projected Participation ⁻³	-	1	1	-	-	2
Advanced Rooftop Controls: DCV with	3.2.17	Energy Savings (MWh) ⁻²	-	6	-	-	6	13

three speed controls or VFD		Summer Demand Reduction (MW)	-	~~3.30.0~~	-	-	~~3.30.0~~	~~6.70.0~~
		Winter Demand Reduction (MW)	-	~~1.30.0~~	-	-	~~1.30.0~~	~~2.70.0~~
		Projected Participation ⁻³	-	1	-	-	1	2
C&I ENERGY STAR Certified Connected Thermostats	3.2.18	Energy Savings (MWh) ⁻²	1	1	1	1	1	5
		Summer Demand Reduction (MW)	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.60.0~~
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ⁻³	4	4	4	4	3	19
Duct Sealing and Insulation	3.2.20	Energy Savings (MWh) ⁻²	2	-	-	2	-	3
		Summer Demand Reduction (MW)	~~0.90.0~~	-	-	~~0.90.0~~	-	~~1.70.0~~
		Winter Demand Reduction (MW)	~~0.30.0~~	-	-	~~0.30.0~~	-	~~0.70.0~~
		Projected Participation ⁻³	1	-	-	1	-	2
Chilled Water Pipe Insulation	3.2.21	Energy Savings (MWh) ⁻²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation ⁻³	-	-	-	-	2	2
Premium Efficiency Motors	3.3.1	Energy Savings (MWh) ⁻²	-	10	-	-	101	111
		Summer Demand Reduction (MW)	-	~~3.20.0~~	-	-	~~32.20.0~~	~~35.40.0~~
		Winter Demand Reduction (MW)	-	~~0.10.0~~	-	-	~~0.90.0~~	~~1.00.0~~
		Projected Participation ⁻³	-	1	-	-	10	11
Variable Frequency Drive (VFD) Improvements	3.3.2	Energy Savings (MWh) ⁻²	178	237	285	225	178	1,103
		Summer Demand Reduction (MW)	~~20.20.0~~	~~26.90.0~~	~~32.30.0~~	~~25.60.0~~	~~20.20.0~~	~~125.20.1~~
		Winter Demand Reduction (MW)	~~41.60.0~~	~~55.50.1~~	~~66.60.1~~	~~52.70.1~~	~~41.60.0~~	~~258.10.3~~
		Projected Participation ⁻³	15	20	24	19	15	93
ECM Circulating Fan	3.3.3	Energy Savings (MWh) ⁻²	-	-	0	-	-	0
		Summer Demand Reduction (MW)	-	-	~~0.20.0~~	-	-	~~0.20.0~~
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0
		Projected Participation ⁻³	-	-	2	-	-	2
VSD on Kitchen Exhaust Fan	3.3.4	Energy Savings (MWh) ⁻²	3	12	12	12	9	49
		Summer Demand Reduction (MW)	~~0.60.0~~	~~2.10.0~~	~~2.10.0~~	~~2.10.0~~	~~1.50.0~~	~~8.20.0~~
		Winter Demand Reduction (MW)	~~0.50.0~~	~~1.70.0~~	~~1.70.0~~	~~1.70.0~~	~~1.30.0~~	~~6.90.0~~
		Projected Participation ⁻³	3	11	11	11	8	44
ECM Circulator Pump	3.3.5	Energy Savings (MWh) ⁻²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	~~0.20.0~~	-	-	~~0.20.0~~
		Winter Demand Reduction (MW)	-	-	~~0.10.0~~	-	-	~~0.10.0~~

		Projected Participation ⁻³	-	-	4	-	-	4
High Efficiency Pumps	3.3.6	Energy Savings (MWh) ⁻²	-	-	24	-	-	24
		Summer Demand Reduction (MW)	-	-	4.50.0	-	-	4.50.0
		Winter Demand Reduction (MW)	-	-	3.40.0	-	-	3.40.0
		Projected Participation ⁻³	-	-	2	-	-	2
Heat Pump Water Heaters	3.4.1	Energy Savings (MWh) ⁻²	2	-	-	4	5	11
		Summer Demand Reduction (MW)	0.50.0	-	-	1.00.0	1.50.0	3.10.0
		Winter Demand Reduction (MW)	0.30.0	-	-	0.60.0	0.80.0	1.70.0
		Projected Participation ⁻³	1	-	-	2	3	6
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs	3.4.2	Energy Savings (MWh) ⁻²	6	6	6	6	6	28
		Summer Demand Reduction (MW)	1.60.0	1.60.0	1.60.0	1.60.0	1.60.0	7.90.0
		Winter Demand Reduction (MW)	0.90.0	0.90.0	0.90.0	0.90.0	0.90.0	4.40.0
		Projected Participation ⁻³	3	3	3	3	3	15
Domestic Hot Water Pipe Insulation	3.4.3	Energy Savings (MWh) ⁻²	-	-	-	1	1	2
		Summer Demand Reduction (MW)	-	-	-	0.20.0	0.30.0	0.50.0
		Winter Demand Reduction (MW)	-	-	-	0.10.0	0.20.0	0.30.0
		Projected Participation ⁻³	-	-	-	1	2	3
ENERGY STAR Refrigeration Cases	3.5.1	Energy Savings (MWh) ⁻²	1	3	3	2	1	9
		Summer Demand Reduction (MW)	0.10.0	0.30.0	0.30.0	0.30.0	0.10.0	1.20.0
		Winter Demand Reduction (MW)	0.10.0	0.30.0	0.30.0	0.30.0	0.10.0	1.20.0
		Projected Participation ⁻³	2	8	8	6	3	27
ENERGY STAR Freezer Cases	3.5.1	Energy Savings (MWh) ⁻²	1	4	5	5	2	18
		Summer Demand Reduction (MW)	0.20.0	0.50.0	0.60.0	0.70.0	0.30.0	2.20.0
		Winter Demand Reduction (MW)	0.20.0	0.50.0	0.60.0	0.70.0	0.30.0	2.20.0
		Projected Participation ⁻³	2	6	7	8	3	26
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Cooler	3.5.2	Energy Savings (MWh) ⁻²	24	31	31	28	24	138
		Summer Demand Reduction (MW)	3.00.0	3.90.0	3.90.0	3.40.0	3.00.0	17.00.0
		Winter Demand Reduction (MW)	3.00.0	3.90.0	3.90.0	3.40.0	3.00.0	17.00.0
		Projected Participation ⁻³	20	26	26	23	20	115
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer	3.5.2	Energy Savings (MWh) ⁻²	4	5	5	5	4	22
		Summer Demand Reduction (MW)	0.50.0	0.60.0	0.60.0	0.60.0	0.50.0	2.70.0
		Winter Demand Reduction (MW)	0.50.0	0.60.0	0.60.0	0.60.0	0.50.0	2.70.0
		Projected Participation ⁻³	21	24	27	24	20	116

Controls: Evaporator Fan Controllers	3.5.3	Energy Savings (MWh) ²	23	25	27	29	16	119
		Summer Demand Reduction (MW)	~~2.30.0~~	~~2.50.0~~	~~2.70.0~~	~~2.90.0~~	~~1.70.0~~	~~12.40.0~~
		Winter Demand Reduction (MW)	~~2.30.0~~	~~2.50.0~~	~~2.70.0~~	~~2.90.0~~	~~1.70.0~~	~~12.40.0~~
		Projected Participation ³	11	12	13	14	8	58
Controls: Floating Head Pressure Controls	3.5.4	Energy Savings (MWh) ²	-	-	-	-	82	82
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	~~2.40.0~~	~~2.40.0~~
		Projected Participation ³	-	-	-	-	2	2
Controls: Anti-Sweat Heater Controls	3.5.5	Energy Savings (MWh) ²	4	7	9	7	6	33
		Summer Demand Reduction (MW)	~~0.20.0~~	~~0.30.0~~	~~0.30.0~~	~~0.30.0~~	~~0.20.0~~	~~1.20.0~~
		Winter Demand Reduction (MW)	~~0.10.0~~	~~0.20.0~~	~~0.30.0~~	~~0.20.0~~	~~0.20.0~~	~~1.00.0~~
		Projected Participation ³	3	5	6	5	4	23
Controls: Evaporator Coil Defrost Control	3.5.6	Energy Savings (MWh) ²	3	6	7	5	2	21
		Summer Demand Reduction (MW)	~~0.10.0~~	~~0.20.0~~	~~0.20.0~~	~~0.10.0~~	~~0.10.0~~	~~0.70.0~~
		Winter Demand Reduction (MW)	~~0.10.0~~	~~0.20.0~~	~~0.20.0~~	~~0.20.0~~	~~0.10.0~~	~~0.80.0~~
		Projected Participation ³	3	6	7	5	2	23
Variable Speed Refrigeration Compressor	3.5.7	Energy Savings (MWh) ²	-	-	-	-	14	14
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	~~0.40.0~~	~~0.40.0~~
		Projected Participation ³	-	-	-	-	2	2
Strip Curtains for Walk-In Freezers and Coolers	3.5.8	Energy Savings (MWh) ²	4	22	44	20	20	109
		Summer Demand Reduction (MW)	~~0.80.0~~	~~4.20.0~~	~~8.50.0~~	~~3.90.0~~	~~3.90.0~~	~~21.20.0~~
		Winter Demand Reduction (MW)	~~0.80.0~~	~~4.20.0~~	~~8.50.0~~	~~3.90.0~~	~~3.90.0~~	~~21.20.0~~
		Projected Participation ³	2	11	22	10	10	55
Night Covers for Display Cases	3.5.9	Energy Savings (MWh) ²	-	-	23	-	-	23
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	4	-	-	4
Auto Closers	3.5.10	Energy Savings (MWh) ²	-	17	27	17	17	77
		Summer Demand Reduction (MW)	-	~~4.10.0~~	~~6.70.0~~	~~4.10.0~~	~~4.10.0~~	~~19.00.0~~
		Winter Demand Reduction (MW)	-	~~4.10.0~~	~~6.70.0~~	~~4.10.0~~	~~4.10.0~~	~~19.00.0~~
		Projected Participation ³	-	8	13	8	8	37
Special Doors with Low or No Anti-Sweat Heat	3.5.11	Energy Savings (MWh) ²	-	-	1	-	-	1

for Reach-In Freezers and Coolers		Summer Demand Reduction (MW)	-	-	0.10.0	-	-	0.10.0
		Winter Demand Reduction (MW)	-	-	0.10.0	-	-	0.10.0
		Projected Participation ³	-	-	3	-	-	3
Suction Pipe Insulation for Walk-In Coolers and Freezers	3.5.12	Energy Savings (MWh) ²	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.10.0	0.10.0
		Winter Demand Reduction (MW)	-	-	-	-	0.10.0	0.10.0
		Projected Participation ³	-	-	-	-	4	4
Refrigerated Display Cases with Doors Replacing Open Cases	3.5.13	Energy Savings (MWh) ²	-	-	-	-	17	17
		Summer Demand Reduction (MW)	-	-	-	-	(0.40.0)	(0.40.0)
		Winter Demand Reduction (MW)	-	-	-	-	7.40.0	7.40.0
		Projected Participation ³	-	-	-	-	16	16
Adding Doors to Existing Refrigerated Display Cases	3.5.14	Energy Savings (MWh) ²	-	-	-	-	11	11
		Summer Demand Reduction (MW)	-	-	-	-	(0.50.0)	(0.50.0)
		Winter Demand Reduction (MW)	-	-	-	-	3.90.0	3.90.0
		Projected Participation ³	-	-	-	-	16	16
Refrigerated Case Light Occupancy Sensors	3.5.15	Energy Savings (MWh) ²	-	0	0	-	-	1
		Summer Demand Reduction (MW)	-	0.0	0.10.0	-	-	0.10.0
		Winter Demand Reduction (MW)	-	0.0	0.10.0	-	-	0.10.0
		Projected Participation ³	-	1	4	-	-	5
Food Service Equipment Novelty Cooler Shutoff	3.5.16	Energy Savings (MWh) ²	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	2	-	-	2
ENERGY STAR Clothes Washer	3.6.1	Energy Savings (MWh) ²	-	0	1	0	0	1
		Summer Demand Reduction (MW)	-	0.0	0.10.0	0.0	0.0	0.20.0
		Winter Demand Reduction (MW)	-	0.0	0.10.0	0.0	0.0	0.20.0
		Projected Participation ³	-	2	4	1	2	9
ENERGY STAR Bathroom Ventilation Fan in Commercial Applications	3.6.2	Energy Savings (MWh) ²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation ³	-	1	1	-	-	2
ENERGY STAR Ice Machines	3.7.1	Energy Savings (MWh) ²	0	1	0	-	-	2
		Summer Demand Reduction (MW)	0.10.0	0.20.0	0.10.0	-	-	0.40.0
		Winter Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	-	-	0.30.0

		Projected Participation ⁻³	1	2	1	-	-	4
<i>Controls: Beverage and Snack Machine Controls</i>	3.7.2	Energy Savings (MWh) ⁻²	-	1	1	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	2	2	-	-	4
<i>ENERGY STAR Electric Steam Cooker</i>	3.7.3	Energy Savings (MWh) ⁻²	-	9	9	-	-	17
		Summer Demand Reduction (MW)	-	1.70.0	1.70.0	-	-	3.50.0
		Winter Demand Reduction (MW)	-	1.10.0	1.10.0	-	-	2.20.0
		Projected Participation ⁻³	-	2	2	-	-	4
<i>ENERGY STAR Combination Oven</i>	3.7.4	Energy Savings (MWh) ⁻²	-	1	1	-	-	1
		Summer Demand Reduction (MW)	-	0.20.0	0.10.0	-	-	0.30.0
		Winter Demand Reduction (MW)	-	0.10.0	0.10.0	-	-	0.20.0
		Projected Participation ⁻³	-	3	2	-	-	5
<i>ENERGY STAR Commercial Convection Oven - Full Size</i>	3.7.5	Energy Savings (MWh) ⁻²	-	2	2	-	-	4
		Summer Demand Reduction (MW)	-	0.40.0	0.40.0	-	-	0.80.0
		Winter Demand Reduction (MW)	-	0.30.0	0.30.0	-	-	0.50.0
		Projected Participation ⁻³	-	2	2	-	-	4
<i>ENERGY STAR Commercial Fryer</i>	3.7.6	Energy Savings (MWh) ⁻²	-	7	5	-	-	12
		Summer Demand Reduction (MW)	-	1.40.0	1.00.0	-	-	2.40.0
		Winter Demand Reduction (MW)	-	0.90.0	0.60.0	-	-	1.50.0
		Projected Participation ⁻³	-	3	2	-	-	5
<i>ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size</i>	3.7.7	Energy Savings (MWh) ⁻²	1	1	1	0	1	3
		Summer Demand Reduction (MW)	0.10.0	0.20.0	0.10.0	0.10.0	0.10.0	0.70.0
		Winter Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	0.0	0.10.0	0.40.0
		Projected Participation ⁻³	2	3	2	1	2	10
<i>ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size</i>	3.7.7	Energy Savings (MWh) ⁻²	-	5	-	5	-	11
		Summer Demand Reduction (MW)	-	1.10.0	-	1.10.0	-	2.20.0
		Winter Demand Reduction (MW)	-	0.70.0	-	0.70.0	-	1.40.0
		Projected Participation ⁻³	-	3	-	3	-	6
<i>ENERGY STAR Commercial Dishwasher</i>	3.7.8	Energy Savings (MWh) ⁻²	14	28	180	14	28	263
		Summer Demand Reduction (MW)	2.80.0	5.60.0	36.10.0	2.80.0	5.60.0	52.80.1
		Winter Demand Reduction (MW)	1.80.0	3.60.0	23.10.0	1.80.0	3.60.0	33.80.0
		Projected Participation ⁻³	1	2	13	1	2	19
<i>ENERGY STAR Commercial</i>	3.7.9	Energy Savings (MWh) ⁻²	-	3	9	-	-	11

Griddle		Summer Demand Reduction (MW)	-	~~0.60.0~~	~~1.70.0~~	-	-	~~2.30.0~~
		Winter Demand Reduction (MW)	-	~~0.40.0~~	~~1.10.0~~	-	-	~~1.50.0~~
		Projected Participation ³	-	1	3	-	-	4
Commercial Induction Cooktops	3.7.10	Energy Savings (MWh) ²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation ³	-	1	1	-	-	2
Wall and Ceiling Insulation	3.8.1	Energy Savings (MWh) ²	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	~~1.20.0~~	~~1.20.0~~
		Winter Demand Reduction (MW)	-	-	-	-	~~1.00.0~~	~~1.00.0~~
		Projected Participation ³	-	-	-	-	2	2
Advanced Power Strips	3.9.1	Energy Savings (MWh) ²	-	-	-	0	-	0
		Summer Demand Reduction (MW)	-	-	-	0.0	-	0.0
		Winter Demand Reduction (MW)	-	-	-	0.0	-	0.0
		Projected Participation ³	-	-	-	2	-	2
ENERGY STAR Servers	3.9.2	Energy Savings (MWh) ²	-	-	-	53,822	-	53,822
		Summer Demand Reduction (MW)	-	-	-	~~6,864.46.9~~	-	~~6,864.46.9~~
		Winter Demand Reduction (MW)	-	-	-	~~7,131.77.1~~	-	~~7,131.77.1~~
		Projected Participation ³	-	-	-	6	-	6
Server Virtualization	3.9.3	Energy Savings (MWh) ²	9	-	-	26	-	35
		Summer Demand Reduction (MW)	~~1.10.0~~	-	-	~~3.20.0~~	-	~~4.30.0~~
		Winter Demand Reduction (MW)	~~1.10.0~~	-	-	~~3.20.0~~	-	~~4.30.0~~
		Projected Participation ³	1	-	-	3	-	4
Cycling Refrigerated Thermal Mass Dryer	3.10.1	Energy Savings (MWh) ²	-	0	0	0	0	2
		Summer Demand Reduction (MW)	-	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.40.0~~
		Winter Demand Reduction (MW)	-	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.10.0~~	~~0.50.0~~
		Projected Participation ³	-	2	2	2	2	8
Air-Entraining Air Nozzle	3.10.2	Energy Savings (MWh) ²	1	-	2	-	6	9
		Summer Demand Reduction (MW)	~~0.10.0~~	-	~~0.20.0~~	-	~~0.70.0~~	~~1.10.0~~
		Winter Demand Reduction (MW)	~~0.10.0~~	-	~~0.20.0~~	-	~~0.70.0~~	~~1.10.0~~
		Projected Participation ³	1	-	2	-	6	9
No-Loss Condensate Drains	3.10.3	Energy Savings (MWh) ²	2	5	13	5	6	31
		Summer Demand Reduction (MW)	~~0.50.0~~	~~1.00.0~~	~~2.90.0~~	~~1.00.0~~	~~1.30.0~~	~~6.80.0~~
		Winter Demand Reduction (MW)	~~0.60.0~~	~~1.30.0~~	~~3.40.0~~	~~1.30.0~~	~~1.60.0~~	~~8.10.0~~

		Projected Participation ⁻³	2	4	11	4	5	26
Air Tanks for Load/No Load Compressors	3.10.4	Energy Savings (MWh) ⁻²	-	1	2	1	2	7
		Summer Demand Reduction (MW)	-	0.20.0	0.50.0	0.20.0	0.50.0	1.50.0
		Winter Demand Reduction (MW)	-	0.20.0	0.50.0	0.20.0	0.50.0	1.50.0
		Projected Participation ⁻³	-	1	2	1	2	6
		Energy Savings (MWh) ⁻²	290	340	328	290	277	1,525
Variable-Speed Drive Air Compressor	3.10.5	Summer Demand Reduction (MW)	62.90.1	73.80.1	71.00.1	62.90.1	60.10.1	330.60.3
		Winter Demand Reduction (MW)	62.90.1	73.80.1	71.00.1	62.90.1	60.10.1	330.60.3
		Projected Participation ⁻³	23	27	26	23	22	121
		Energy Savings (MWh) ⁻²	1	2	2	1	1	6
Compressed Air Controller	3.10.6	Summer Demand Reduction (MW)	0.10.0	0.40.0	0.40.0	0.20.0	0.20.0	1.30.0
		Winter Demand Reduction (MW)	0.10.0	0.40.0	0.40.0	0.20.0	0.20.0	1.30.0
		Projected Participation ⁻³	1	3	3	2	2	11
		Energy Savings (MWh) ⁻²	-	2	2	2	2	8
Compressed Air Low Pressure Drop Filters	3.10.7	Summer Demand Reduction (MW)	-	0.40.0	0.40.0	0.50.0	0.40.0	1.70.0
		Winter Demand Reduction (MW)	-	0.40.0	0.40.0	0.50.0	0.40.0	1.70.0
		Projected Participation ⁻³	-	18	17	19	17	71
		Energy Savings (MWh) ⁻²	0	1	1	1	1	3
Compressed Air Mist Eliminators	3.10.8	Summer Demand Reduction (MW)	0.0	0.10.0	0.10.0	0.10.0	0.10.0	0.30.0
		Winter Demand Reduction (MW)	0.0	0.10.0	0.10.0	0.10.0	0.10.0	0.30.0
		Projected Participation ⁻³	1	10	10	10	13	44
		Energy Savings (MWh) ⁻²	-	-	1	-	-	1
Engine Block Heater Timer	3.11.2	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	-	2	-	-	2
		Energy Savings (MWh) ⁻²	9	10	11	10	6	46
High Frequency Battery Chargers	3.11.3	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	7	8	9	8	5	37
		Energy Savings (MWh) ⁻²	-	-	1	-	0	1
Uninterruptible Power Supply (UPS)	3.11.4	Summer Demand Reduction (MW)	-	-	0.10.0	-	0.0	0.10.0
		Winter Demand Reduction (MW)	-	-	0.10.0	-	0.0	0.10.0
		Projected Participation ⁻³	-	-	5	-	1	6
		Energy Savings (MWh) ⁻²	3	-	3	-	-	6
Automatic Milker Takeoffs	4.1.1	Energy Savings (MWh) ⁻²	3	-	3	-	-	6

		Summer Demand Reduction (MW)	~~0.50.0~~	-	~~0.50.0~~	-	-	~~1.10.0~~
		Winter Demand Reduction (MW)	~~0.50.0~~	-	~~0.50.0~~	-	-	~~1.10.0~~
		Projected Participation ⁻³	1	-	1	-	-	2
Dairy Scroll Compressors	4.1.2	Energy Savings (MWh) ⁻²	12	12	23	-	-	46
		Summer Demand Reduction (MW)	~~2.10.0~~	~~2.10.0~~	~~4.20.0~~	-	-	~~8.50.0~~
		Winter Demand Reduction (MW)	~~2.10.0~~	~~2.10.0~~	~~4.20.0~~	-	-	~~8.50.0~~
		Projected Participation ⁻³	1	1	2	-	-	4
High-Efficiency Ventilation Fans with and without Thermostats	4.1.3	Energy Savings (MWh) ⁻²	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	~~0.50.0~~	-	-	~~0.50.0~~
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	-	4	-	-	4
Heat Reclaimers	4.1.4	Energy Savings (MWh) ⁻²	2	-	7	-	-	9
		Summer Demand Reduction (MW)	~~0.40.0~~	-	~~1.20.0~~	-	-	~~1.60.0~~
		Winter Demand Reduction (MW)	~~0.40.0~~	-	~~1.30.0~~	-	-	~~1.70.0~~
		Projected Participation ⁻³	1	-	3	-	-	4
High Volume Low Speed Fans	4.1.5	Energy Savings (MWh) ⁻²	108	149	166	149	116	689
		Summer Demand Reduction (MW)	~~40.00.0~~	~~55.40.1~~	~~61.50.1~~	~~55.40.1~~	~~43.10.0~~	~~255.40.3~~
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	13	18	20	18	14	83
Livestock Waterer	4.1.6	Energy Savings (MWh) ⁻²	-	-	1	-	0	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	~~1.30.0~~	-	~~0.40.0~~	~~1.70.0~~
		Projected Participation ⁻³	-	-	3	-	1	4
Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	4.1.7	Energy Savings (MWh) ⁻²	-	5	5	-	5	15
		Summer Demand Reduction (MW)	-	~~0.80.0~~	~~0.80.0~~	-	~~0.80.0~~	~~2.30.0~~
		Winter Demand Reduction (MW)	-	~~0.80.0~~	~~0.80.0~~	-	~~0.80.0~~	~~2.30.0~~
		Projected Participation ⁻³	-	1	1	-	1	3
Low Pressure Irrigation System	4.1.8	Energy Savings (MWh) ⁻²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	~~0.50.0~~	~~0.50.0~~	-	-	~~1.00.0~~
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	1	1	-	-	2
New Construction Lighting	3.1.2	Energy Savings (MWh) ⁻²	3,691	~~5,625~~ 5,186	~~10,020~~ 9,141	~~9,668~~ 8,947	~~6,680~~ 6,188	~~35,684~~ 33,153
		Summer Demand Reduction (MW)	~~652.20.7~~	~~993.90.9~~	~~1,770.41.6~~	~~1,708.31.6~~	~~1,180.31.1~~	~~6,305.15.9~~
		Winter Demand Reduction (MW)	~~652.20.7~~	~~993.90.9~~	~~1,770.41.6~~	~~1,708.31.6~~	~~1,180.31.1~~	~~6,305.15.9~~

		Projected Participation ⁻³	21	3230	5752	5551	3835	203189
Indoor Horticultural Lighting	3.1.7	Energy Savings (MWh) ⁻²	3	5	7	8	10	33
		Summer Demand Reduction (MW)	0.50.0	0.80.0	1.00.0	1.30.0	1.50.0	5.20.0
		Winter Demand Reduction (MW)	0.40.0	0.60.0	0.90.0	1.10.0	1.30.0	4.30.0
		Projected Participation ⁻³	2	3	4	5	6	20
High Efficiency Transformer	3.11.1	Energy Savings (MWh) ⁻²	2	4	3	3	2	15
		Summer Demand Reduction (MW)	0.30.0	0.50.0	0.40.0	0.40.0	0.30.0	1.90.0
		Winter Demand Reduction (MW)	0.30.0	0.50.0	0.40.0	0.40.0	0.30.0	1.90.0
		Projected Participation ⁻³	2	4	3	3	2	14
Midstream lighting incentives - Street lighting	3.1.6	Energy Savings (MWh) ⁻²	1,537	1,6761,509	1,7541,576	1,6761,509	1,5371,384	8,1787,514
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	206.90.2	225.60.2	235.70.2	225.60.2	206.90.2	1,100.71.0
		Projected Participation ⁻³	3,270	3,5653,209	3,7243,352	3,5653,209	3,2702,943	17,39415,982
Midstream lighting incentives: Outdoor floods	3.1.6	Energy Savings (MWh) ⁻²	1,180	1,3091,178	1,7451,571	1,3091,178	1,1801,062	6,7226,168
		Summer Demand Reduction (MW)	57.30.1	63.50.1	84.70.1	63.50.1	57.30.1	326.30.3
		Winter Demand Reduction (MW)	307.40.3	341.10.3	454.90.4	341.10.3	307.40.3	1,754.91.6
		Projected Participation ⁻³	3,213	3,5653,209	4,7544,279	3,5653,209	3,2132,892	18,31016,800
Midstream lighting incentives: High Bays	3.1.6	Energy Savings (MWh) ⁻²	3,029	3,2712,944	3,4283,085	3,2712,944	3,0292,726	16,02914,729
		Summer Demand Reduction (MW)	829.60.8	895.90.8	938.80.8	895.90.8	829.60.7	4,389.84.0
		Winter Demand Reduction (MW)	789.70.8	852.90.8	893.80.8	852.90.8	789.70.7	4,179.13.8
		Projected Participation ⁻³	4,237	4,5764,118	4,7954,316	4,5764,118	4,2373,813	22,42120,603
Midstream lighting incentives: Other Interior Fixtures	3.1.6	Energy Savings (MWh) ⁻²	855	968872	1,013912	921829	855769	4,6124,236
		Summer Demand Reduction (MW)	234.60.2	265.80.2	278.10.3	252.70.2	234.60.2	1,265.81.2
		Winter Demand Reduction (MW)	222.90.2	252.60.2	264.30.2	240.20.2	222.90.2	1,203.01.1
		Projected Participation ⁻³	17,951	20,34118,307	21,28519,157	19,34117,407	17,95116,156	96,86988,977
HVAC Systems for Midstream Delivery: Air Conditioner	3.2.2	Energy Savings (MWh) ⁻²	-	30	30	30	30	120
		Summer Demand Reduction (MW)	-	15.50.0	15.50.0	15.50.0	15.50.0	61.90.1
		Winter Demand Reduction (MW)	-	6.20.0	6.20.0	6.20.0	6.20.0	24.70.0
		Projected Participation ⁻³	-	40	40	40	40	160
HVAC Systems for Midstream Delivery: Heat Pump	3.2.2	Energy Savings (MWh) ⁻²	-	30	30	30	30	122
		Summer Demand Reduction (MW)	-	15.60.0	15.60.0	15.60.0	15.60.0	62.50.1
		Winter Demand Reduction (MW)	-	6.20.0	6.20.0	6.20.0	6.20.0	24.90.0
		Projected Participation ⁻³	-	40	40	40	40	160
Ductless Mini-Split Heat Pumps -	3.2.6	Energy Savings (MWh) ⁻²	-	75	77	77	77	305

Commercial < 5.4 Tons for Midstream Delivery		Summer Demand Reduction (MW)	-	54.70.1	55.80.1	55.80.1	55.80.1	222.10.2
		Winter Demand Reduction (MW)	-	41.80.0	42.70.0	42.70.0	42.70.0	169.80.2
		Projected Participation ³	-	49	50	50	50	199
Midstream Indoor Horticultural Lighting	3.1.7	Energy Savings (MWh) ²	2	2	3	3	2	12
		Summer Demand Reduction (MW)	0.30.0	0.30.0	0.50.0	0.50.0	0.30.0	1.80.0
		Winter Demand Reduction (MW)	0.20.0	0.20.0	0.40.0	0.40.0	0.20.0	1.50.0
		Projected Participation ³	1	1	2	2	1	7
Midstream Premium Efficiency Motors	3.3.1	Energy Savings (MWh) ²	20	20	20	20	20	101
		Summer Demand Reduction (MW)	6.40.0	6.40.0	6.40.0	6.40.0	6.40.0	32.20.0
		Winter Demand Reduction (MW)	0.20.0	0.20.0	0.20.0	0.20.0	0.20.0	0.90.0
		Projected Participation ³	2	2	2	2	2	10
Midstream Variable Frequency Drive (VFD) Improvements	3.3.2	Energy Savings (MWh) ²	47	47	47	47	47	237
		Summer Demand Reduction (MW)	5.40.0	5.40.0	5.40.0	5.40.0	5.40.0	26.90.0
		Winter Demand Reduction (MW)	11.10.0	11.10.0	11.10.0	11.10.0	11.10.0	55.50.1
		Projected Participation ³	4	4	4	4	4	20
Midstream ENERGY STAR Refrigeration Cases	3.5.1	Energy Savings (MWh) ²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.20.0	0.20.0
		Winter Demand Reduction (MW)	-	-	-	-	0.20.0	0.20.0
		Projected Participation ³	-	-	-	-	4	4
Midstream ENERGY STAR Freezer Cases	3.5.1	Energy Savings (MWh) ²	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.30.0	0.30.0
		Winter Demand Reduction (MW)	-	-	-	-	0.30.0	0.30.0
		Projected Participation ³	-	-	-	-	4	4
Midstream Controls: Evaporator Fan Controllers	3.5.3	Energy Savings (MWh) ²	-	-	-	-	4	4
		Summer Demand Reduction (MW)	-	-	-	-	0.40.0	0.40.0
		Winter Demand Reduction (MW)	-	-	-	-	0.40.0	0.40.0
		Projected Participation ³	-	-	-	-	2	2
Midstream Controls: Anti-Sweat Heater Controls	3.5.5	Energy Savings (MWh) ²	3	3	3	3	3	14
		Summer Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	0.10.0	0.10.0	0.50.0
		Winter Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	0.10.0	0.10.0	0.40.0
		Projected Participation ³	2	2	2	2	2	10
Midstream Controls: Evaporator Coil Defrost Control	3.5.6	Energy Savings (MWh) ²	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.10.0	0.10.0
		Winter Demand Reduction (MW)	-	-	-	-	0.10.0	0.10.0

		Projected Participation ⁻³	-	-	-	-	2	2
Midstream ENERGY STAR Ice Machines	3.7.1	Energy Savings (MWh) ⁻²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	0.10.0	0.10.0	0.50.0
		Winter Demand Reduction (MW)	0.10.0	0.10.0	0.10.0	0.10.0	0.10.0	0.30.0
		Projected Participation ⁻³	1	1	1	1	1	5
Midstream ENERGY STAR Electric Steam Cooker	3.7.3	Energy Savings (MWh) ⁻²	4	4	4	4	4	21
		Summer Demand Reduction (MW)	0.90.0	0.90.0	0.90.0	0.90.0	0.90.0	4.30.0
		Winter Demand Reduction (MW)	0.60.0	0.60.0	0.60.0	0.60.0	0.60.0	2.80.0
		Projected Participation ⁻³	1	1	1	1	1	5
Midstream ENERGY STAR Combination Oven	3.7.4	Energy Savings (MWh) ⁻²	2	0	1	0	1	4
		Summer Demand Reduction (MW)	0.30.0	0.10.0	0.30.0	0.10.0	0.20.0	0.90.0
		Winter Demand Reduction (MW)	0.20.0	0.0	0.20.0	0.0	0.10.0	0.60.0
		Projected Participation ⁻³	6	1	5	1	4	17
Midstream ENERGY STAR Commercial Convection Oven - Full Size	3.7.5	Energy Savings (MWh) ⁻²	6	-	1	-	1	8
		Summer Demand Reduction (MW)	1.30.0	-	0.20.0	-	0.20.0	1.70.0
		Winter Demand Reduction (MW)	0.80.0	-	0.10.0	-	0.10.0	1.10.0
		Projected Participation ⁻³	6	-	1	-	1	8
Midstream ENERGY STAR Commercial Fryer	3.7.6	Energy Savings (MWh) ⁻²	14	7	7	7	7	43
		Summer Demand Reduction (MW)	2.90.0	1.40.0	1.40.0	1.40.0	1.40.0	8.60.0
		Winter Demand Reduction (MW)	1.80.0	0.90.0	0.90.0	0.90.0	0.90.0	5.50.0
		Projected Participation ⁻³	6	3	3	3	3	18
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	3.7.7	Energy Savings (MWh) ⁻²	1	-	-	-	-	1
		Summer Demand Reduction (MW)	0.10.0	-	-	-	-	0.10.0
		Winter Demand Reduction (MW)	0.10.0	-	-	-	-	0.10.0
		Projected Participation ⁻³	2	-	-	-	-	2
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	3.7.7	Energy Savings (MWh) ⁻²	4	-	-	-	-	4
		Summer Demand Reduction (MW)	0.70.0	-	-	-	-	0.70.0
		Winter Demand Reduction (MW)	0.50.0	-	-	-	-	0.50.0
		Projected Participation ⁻³	2	-	-	-	-	2
Midstream ENERGY STAR Commercial Dishwasher	3.7.8	Energy Savings (MWh) ⁻²	28	28	124	41	28	249
		Summer Demand Reduction (MW)	5.60.0	5.60.0	25.00.0	8.30.0	5.60.0	50.00.1
		Winter Demand Reduction (MW)	3.60.0	3.60.0	16.00.0	5.30.0	3.60.0	32.00.0
		Projected Participation ⁻³	2	2	9	3	2	18
Midstream ENERGY STAR	3.7.9	Energy Savings (MWh) ⁻²	-	-	6	-	-	6

Commercial Griddle		Summer Demand Reduction (MW)	-	-	~~1.20.0~~	-	-	~~1.20.0~~
		Winter Demand Reduction (MW)	-	-	~~0.70.0~~	-	-	~~0.70.0~~
		Projected Participation ⁻³	-	-	2	-	-	2
Midstream Air Tanks for Load/No Load Compressors	3.10.4	Energy Savings (MWh) ⁻²	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	~~0.50.0~~	~~0.50.0~~
		Winter Demand Reduction (MW)	-	-	-	-	~~0.50.0~~	~~0.50.0~~
		Projected Participation ⁻³	-	-	-	-	2	2
Midstream Variable-Speed Drive Air Compressor	3.10.5	Energy Savings (MWh) ⁻²	25	25	25	25	25	126
		Summer Demand Reduction (MW)	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~27.30.0~~
		Winter Demand Reduction (MW)	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~5.50.0~~	~~27.30.0~~
		Projected Participation ⁻³	2	2	2	2	2	10
Midstream High-Efficiency Ventilation Fans with and without Thermostats	4.1.3	Energy Savings (MWh) ⁻²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	~~0.30.0~~	-	-	~~0.30.0~~
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	-	-	2	-	-	2
Midstream Heat Reclaimers	4.1.4	Energy Savings (MWh) ⁻²	-	-	4	-	-	4
		Summer Demand Reduction (MW)	-	-	~~0.80.0~~	-	-	~~0.80.0~~
		Winter Demand Reduction (MW)	-	-	~~0.80.0~~	-	-	~~0.80.0~~
		Projected Participation ⁻³	-	-	2	-	-	2
Midstream High Volume Low Speed Fans	4.1.5	Energy Savings (MWh) ⁻²	307	307	307	307	307	1,536
		Summer Demand Reduction (MW)	~~113.90.1~~	~~113.90.1~~	~~113.90.1~~	~~113.90.1~~	~~113.90.1~~	~~569.30.6~~
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	37	37	37	37	37	185
Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	4.1.7	Energy Savings (MWh) ⁻²	-	-	10	-	-	10
		Summer Demand Reduction (MW)	-	-	~~1.50.0~~	-	-	~~1.50.0~~
		Winter Demand Reduction (MW)	-	-	~~1.50.0~~	-	-	~~1.50.0~~
		Projected Participation ⁻³	-	-	2	-	-	2
Building Operator Certification Training	3.11.5	Energy Savings (MWh) ⁻²	1,296	1,729	1,729	2,161	2,161	9,075
		Summer Demand Reduction (MW)	~~97.30.1~~	~~129.70.1~~	~~129.70.1~~	~~162.10.2~~	~~162.10.2~~	~~680.80.7~~
		Winter Demand Reduction (MW)	~~68.70.1~~	~~91.70.1~~	~~91.70.1~~	~~114.60.1~~	~~114.60.1~~	~~481.20.5~~
		Projected Participation ⁻³	6	8	8	10	10	42
Custom: Other - SEM	~~0.0.6~~ Custom	Energy Savings (MWh) ⁻²	2,108	~~4,005~~ 6,408	~~6,008~~ 9,613	~~6,956~~ 11,130	~~8,010~~ 12,817	~~27,088~~ 42,076
		Summer Demand Reduction (MW)	~~466.50.5~~	~~886.41.4~~	~~1,329.62.1~~	~~1,539.52.5~~	~~1,772.82.8~~	~~5,994.89.3~~
		Winter Demand Reduction (MW)	~~466.50.5~~	~~886.41.4~~	~~1,329.62.1~~	~~1,539.52.5~~	~~1,515.12.4~~	~~5,737.18.9~~

		Projected Participation ⁻³	10	1930	2946	3353	3861	129200
Custom: Other - VCx	0-0.7Custom	Energy Savings (MWh) ⁻²	7,500	7,5007,875	7,5007,875	7,5007,875	7,5007,875	37,50039,000
		Summer Demand Reduction (MW)	1,246.11.2	1,246.11.3	1,246.11.3	1,246.11.3	1,246.11.3	6,230.36.5
		Winter Demand Reduction (MW)	1,246.11.2	1,246.11.3	1,246.11.3	1,246.11.3	1,246.11.3	6,230.36.5
		Projected Participation ⁻³	75	7579	7579	7579	7579	375390
Custom: Other - vSEM	0-0.9Custom	Energy Savings (MWh) ⁻²	-	2,000	2,000	2,000	5,000	11,000
		Summer Demand Reduction (MW)	-	332.30.3	332.30.3	332.30.3	830.70.8	1,827.51.8
		Winter Demand Reduction (MW)	-	332.30.3	332.30.3	332.30.3	830.70.8	1,827.51.8
		Projected Participation ⁻³	-	20	20	20	50	110
Solar	0-0.23.11.6	Energy Savings (MWh) ⁻²	14,455	17,00621,300	16,36819,642	10,20412,244	2,551	60,58370,192
		Summer Demand Reduction (MW)	5,031.55.0	5,919.47.4	5,697.46.8	3,551.64.3	887.90.9	21,087.824.4
		Winter Demand Reduction (MW)	784.30.8	922.81.2	888.21.1	553.70.7	138.40.1	3,287.33.8
		Projected Participation ⁻³	68	80100	7792	4858	12	285330
Custom: Other - Compressed Air	0-0.10Custom	Energy Savings (MWh) ⁻²	1,367	1,641	1,914	3,829	3,829	12,580
		Summer Demand Reduction (MW)	136.80.1	164.20.2	191.60.2	383.20.4	383.20.4	1,258.91.3
		Winter Demand Reduction (MW)	136.80.1	164.20.2	191.60.2	383.20.4	383.20.4	1,258.91.3
		Projected Participation ⁻³	5	6	7	14	14	46
Custom: Data Center	0-0.11Custom	Energy Savings (MWh) ⁻²	420	420	630	630	630	2,730
		Summer Demand Reduction (MW)	32.00.0	32.00.0	48.10.0	48.10.0	48.10.0	208.20.2
		Winter Demand Reduction (MW)	32.00.0	32.00.0	48.10.0	48.10.0	48.10.0	208.20.2
		Projected Participation ⁻³	2	2	3	3	3	13
Custom: HVAC Custom: HVAC	0-0.12Custom	Energy Savings (MWh) ⁻²	6,628	10,116	13,081	13,081	13,081	55,985
		Summer Demand Reduction (MW)	2,033.62.0	3,103.93.1	4,013.64.0	4,013.64.0	4,013.64.0	17,178.317.2
		Winter Demand Reduction (MW)	2,033.62.0	3,103.93.1	4,013.64.0	4,013.64.0	4,013.64.0	17,178.317.2
		Projected Participation ⁻³	38	58	75	75	75	321
Custom: Motors & Drives	0-0.13Custom	Energy Savings (MWh) ⁻²	3,155	4,2075,048	4,9085,889	4,9085,889	4,9085,889	22,08525,871
		Summer Demand Reduction (MW)	566.70.6	755.60.9	881.51.1	881.51.1	881.51.1	3,966.84.6
		Winter Demand Reduction (MW)	566.70.6	755.60.9	881.51.1	881.51.1	881.51.1	3,966.84.6
		Projected Participation ⁻³	9	1214	1417	1417	1417	6374
Custom: Other	0-0.14Custom	Energy Savings (MWh) ⁻²	20,530	25,903	29,356	29,356	16,501	121,647
		Summer Demand Reduction (MW)	2,241.12.2	2,827.52.8	3,204.53.2	3,204.53.2	1,801.21.8	13,278.913.3
		Winter Demand Reduction (MW)	2,241.12.2	2,827.52.8	3,204.53.2	3,204.53.2	1,801.21.8	13,278.913.3
		Projected Participation ⁻³	107	135	153	153	86	634
Custom: Process	0-0.15Custom	Energy Savings (MWh) ⁻²	1,555	2,000	2,222	2,222	2,888	10,887

		Summer Demand Reduction (MW)	~~370.0~~ <u>0.4</u>	~~475.7~~ <u>0.5</u>	~~528.6~~ <u>0.5</u>	~~528.6~~ <u>0.5</u>	~~687.2~~ <u>0.7</u>	~~2,590.4~~ <u>2.6</u>
		Winter Demand Reduction (MW)	~~370.0~~ <u>0.4</u>	~~475.7~~ <u>0.5</u>	~~528.6~~ <u>0.5</u>	~~528.6~~ <u>0.5</u>	~~687.2~~ <u>0.7</u>	~~2,590.4~~ <u>2.6</u>
		Projected Participation ⁻³	7	9	10	10	13	49
Custom: Refrigeration	~~0.0-16~~ <u>Custom</u>	Energy Savings (MWh) ⁻²	2,144	2,703	3,076	3,076	3,076	14,074
		Summer Demand Reduction (MW)	~~247.8~~ <u>0.2</u>	~~312.4~~ <u>0.3</u>	~~355.5~~ <u>0.4</u>	~~355.5~~ <u>0.4</u>	~~355.5~~ <u>0.4</u>	~~1,626.9~~ <u>1.6</u>
		Winter Demand Reduction (MW)	~~247.8~~ <u>0.2</u>	~~312.4~~ <u>0.3</u>	~~355.5~~ <u>0.4</u>	~~355.5~~ <u>0.4</u>	~~355.5~~ <u>0.4</u>	~~1,626.9~~ <u>1.6</u>
		Projected Participation ⁻³	23	29	33	33	33	151
		Energy Savings (MWh) ⁻²	891	1,188	1,336	1,336	1,336	6,088
Custom: EMS	~~0.0-17~~ <u>Custom</u>	Summer Demand Reduction (MW)	~~35.2~~ <u>0.0</u>	~~46.9~~ <u>0.0</u>	~~52.7~~ <u>0.1</u>	~~52.7~~ <u>0.1</u>	~~52.7~~ <u>0.1</u>	~~240.2~~ <u>0.2</u>
		Winter Demand Reduction (MW)	~~35.2~~ <u>0.0</u>	~~46.9~~ <u>0.0</u>	~~52.7~~ <u>0.1</u>	~~52.7~~ <u>0.1</u>	~~52.7~~ <u>0.1</u>	~~240.2~~ <u>0.2</u>
		Projected Participation ⁻³	6	8	9	9	9	41
		Energy Savings (MWh) ⁻²	7,198	9,064	10,130	10,130	10,130	46,652
Custom: Retrocommissioning	~~0.0-18~~ <u>Custom</u>	Summer Demand Reduction (MW)	~~3,320.7~~ <u>3.3</u>	~~4,181.6~~ <u>4.2</u>	~~4,673.6~~ <u>4.7</u>	~~4,673.6~~ <u>4.7</u>	~~4,673.6~~ <u>4.7</u>	~~21,523.2~~ <u>21.5</u>
		Winter Demand Reduction (MW)	~~3,320.7~~ <u>3.3</u>	~~4,181.6~~ <u>4.2</u>	~~4,673.6~~ <u>4.7</u>	~~4,673.6~~ <u>4.7</u>	~~4,673.6~~ <u>4.7</u>	~~21,523.2~~ <u>21.5</u>
		Projected Participation ⁻³	27	34	38	38	38	175
		Energy Savings (MWh) ⁻²	2,470	~~9,549~~ <u>14,323</u>	16,154	10,769	10,769	~~49,710~~ <u>54,484</u>
Custom: CHP	~~0.0-19~~ <u>Custom</u>	Summer Demand Reduction (MW)	~~242.8~~ <u>0.2</u>	~~485.5~~ <u>0.7</u>	~~728.3~~ <u>0.7</u>	~~485.5~~ <u>0.5</u>	~~485.5~~ <u>0.5</u>	~~2,427.6~~ <u>2.7</u>
		Winter Demand Reduction (MW)	~~242.8~~ <u>0.2</u>	~~485.5~~ <u>0.7</u>	~~728.3~~ <u>0.7</u>	~~485.5~~ <u>0.5</u>	~~485.5~~ <u>0.5</u>	~~2,427.6~~ <u>2.7</u>
		Projected Participation ⁻³	1	~~2~~ <u>3</u>	3	2	2	~~10~~ <u>11</u>
		Energy Savings (MWh) ⁻²	-	-	-	-	-	-
~~Ashre~~ <u>ASHARE</u> Audits/Feasibility Studies	~~0.0-20~~ <u>Audit</u>	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	10	10	10	10	10	50
		Energy Savings (MWh) ⁻²	-	-	-	-	-	-
Incentive Buy Down	~~0.0-21~~ <u>N/A</u>	Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ⁻³	30	35	40	45	50	200
		Energy Savings (MWh) ⁻²	-	-	-	-	-	-
C&I Load Shifting	~~3-12.1~~ <u>Load Shifting Measure</u>	Summer Demand Reduction (MW)	~~43.2~~ <u>0.0</u>	~~86.4~~ <u>0.1</u>	~~108.0~~ <u>0.1</u>	~~129.6~~ <u>0.1</u>	~~129.6~~ <u>0.1</u>	~~496.8~~ <u>0.5</u>
		Winter Demand Reduction (MW)	~~43.2~~ <u>0.0</u>	~~86.4~~ <u>0.1</u>	~~108.0~~ <u>0.1</u>	~~129.6~~ <u>0.1</u>	~~129.6~~ <u>0.1</u>	~~496.8~~ <u>0.5</u>
		Projected Participation ⁻³	2	4	5	6	6	23
		Energy Savings (MWh) ⁻²	-	-	-	-	-	-

Estimated Program Budget (Total) by Year

Table 34. Non-Residential Program Budget

Non-Residential							
Total Budget (\$000)		\$34,181²⁵³³34,179	\$41,904²⁵³³42,508	\$47,195²⁵³³47,045	\$51,004²⁵³³50,850	\$39,614²⁵³³39,342	\$213,898²⁵³³213,923
Incentives (\$000)²⁵³³	Rebates	\$16,170 ²⁵³³ 16,168	\$21,372 ²⁵³³ 22,512	\$23,975 ²⁵³³ 24,396	\$27,619 ²⁵³³ 27,998	\$19,062 ²⁵³³ 19,270	\$108,198 ²⁵³³ 110,345
	Upstream/Midstream Buydown	\$913	\$1,062 ²⁵³³ 967	\$1,159 ²⁵³³ 1,056	\$1,040 ²⁵³³ 948	\$973 ²⁵³³ 888	\$5,148 ²⁵³³ 4,772
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$4,022	\$4,534 ²⁵³³ 4,093	\$4,825 ²⁵³³ 4,356	\$4,546 ²⁵³³ 4,105	\$4,077 ²⁵³³ 3,683	\$22,004 ²⁵³³ 20,258
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$21,105²⁵³³21,103	\$26,968²⁵³³27,572	\$29,959²⁵³³29,808	\$33,205²⁵³³33,050	\$24,112²⁵³³23,840	\$135,349²⁵³³135,374
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549
Percent Incentives		62%	64²⁵³³65%	63%	65%	61%	63%

²⁵³³ Incentive totals include interest-free financing options for qualified small commercial customers in addition to traditional incentive offerings. These financing options fall within the incentive definition outlined in the TRC Order of “transfer payments intended to offset the IMC of efficient equipment.”

Estimated Percentage of Sector Budget Attributed to the Program

The Non-Residential program offers incentives to customers in the SCI and LCI sectors. The Non-Residential program accounts for 95.6% of SCI and 95.9% of LCI sector spending exclusive of common cost allocation.

Table 35. Non-Residential Summary of EE&C Costs

Non-Residential Portfolio	Small C&I	~~\$66,587,232~~ <u>\$64,986,024</u>	\$0	\$0	\$0	~~\$34,814,665~~ <u>\$34,814,664</u>	\$1,155,777	\$0	\$33,423	\$0	~~\$102,591,096~~ <u>\$100,989,888</u>	~~\$232,236~~ <u>\$232,236</u>	~~\$70,721~~ <u>\$70,721</u>	~~\$1,458,638~~ <u>\$1,458,638</u>
	Large C&I	~~\$68,761,645~~ <u>\$70,388,160</u>	\$0	\$0	\$0	~~\$41,142,531~~ <u>\$41,142,530</u>	\$1,363,220	\$0	\$39,327	\$0	~~\$111,306,722~~ <u>\$112,933,237</u>	~~\$209,206~~ <u>\$209,206</u>	\$69	~~\$1,157,362~~ <u>\$1,157,362</u>
	Sector Total	~~\$135,348,877~~ <u>\$135,374,185</u>	\$0	\$0	\$0	~~\$75,957,195~~ <u>\$75,957,194</u>	~~\$2,518,997~~ <u>\$2,518,997</u>	\$0	\$72,750	\$0	~~\$213,897,819~~ <u>\$213,923,126</u>	\$220	\$70	~~\$1,308,000~~ <u>\$1,308,000</u>

Cost Effectiveness

Table 36. Non-Residential TRC Benefits (Gross)

Non-Residential	PY18	1.00	~~1.561~~ <u>.50</u>	~~\$21,105~~ <u>21,103</u>	~~\$78,457~~ <u>78,459</u>	\$13,076	\$112,638	\$52,133	\$116,672	\$36	~~\$7,072~~ <u>2</u>	~~\$175,913~~ <u>168,844</u>
Non-Residential	PY19	1.00	~~1.571~~ <u>.47</u>	~~\$26,968~~ <u>27,572</u>	~~\$101,443~~ <u>108,485</u>	\$14,936	~~\$143,347~~ <u>0,993</u>	~~\$64,384~~ <u>65,867</u>	~~\$152,603~~ <u>155,479</u>	~~\$104~~ <u>09</u>	~~\$8,550~~ <u>3</u>	~~\$225,640~~ <u>221,458</u>
Non-Residential	PY20	1.00	~~1.401~~ <u>.33</u>	~~\$29,959~~ <u>29,808</u>	~~\$129,049~~ <u>131,215</u>	\$17,236	~~\$176,244~~ <u>8,259</u>	~~\$71,161~~ <u>71,977</u>	~~\$166,875~~ <u>165,799</u>	~~\$172~~ <u>78</u>	~~\$9,338~~ <u>3</u>	~~\$247,546~~ <u>237,957</u>
Non-Residential	PY21	1.00	~~1.471~~ <u>.41</u>	~~\$33,205~~ <u>33,050</u>	~~\$109,050~~ <u>109,621</u>	\$17,799	~~\$160,055~~ <u>0,470</u>	~~\$68,362~~ <u>69,134</u>	~~\$158,497~~ <u>157,817</u>	~~\$56~~ <u>61</u>	~~\$8,303~~ <u>3</u>	~~\$235,217~~ <u>227,015</u>
Non-Residential	PY22	1.00	~~1.571~~ <u>.54</u>	~~\$24,112~~ <u>23,840</u>	~~\$79,227~~ <u>76,785</u>	\$15,502	~~\$118,840~~ <u>6,127</u>	~~\$54,697~~ <u>54,944</u>	~~\$125,133~~ <u>124,246</u>	~~\$75~~ <u>80</u>	~~\$7,072~~ <u>2</u>	~~\$186,977~~ <u>179,272</u>
Non-Residential Total		1.00	~~1.51~~ <u>74</u>	~~\$135,349~~ <u>135,374</u>	~~\$497,226~~ <u>504,565</u>	\$78,549	~~\$711,124~~ <u>8,488</u>	~~\$310,737~~ <u>314,055</u>	~~\$719,780~~ <u>720,013</u>	~~\$44~~ <u>34</u>	~~\$40,333~~ <u>14</u>	~~\$1,071,293~~ <u>1,034,546</u>

Table 37. Non-Residential TRC Benefits (Net)

Non-Residential	PY18	0.68 4	~~1.481~~ <u>42</u>	~~\$21,105~~ <u>21,103</u>	~~\$47,005~~ <u>47,008</u>	\$13,076	\$81,187	\$35,664	\$79,815	\$25	~~\$4,838~~ <u>2</u>	~~\$120,342~~ <u>115,506</u>
Non-Residential	PY19	0.68 4	~~1.501~~ <u>40</u>	~~\$26,968~~ <u>27,572</u>	~~\$60,878~~ <u>65,505</u>	\$14,936	~~\$102,782~~ <u>108,013</u>	~~\$44,045~~ <u>45,059</u>	~~\$104,396~~ <u>106,363</u>	~~\$7175~~ <u>2</u>	~~\$5,849~~ <u>2</u>	~~\$154,360~~ <u>151,499</u>
Non-Residential	PY20	0.68 4	~~1.341~~ <u>28</u>	~~\$29,959~~ <u>29,808</u>	~~\$78,819~~ <u>80,347</u>	\$17,236	~~\$126,013~~ <u>127,392</u>	~~\$48,681~~ <u>49,240</u>	~~\$114,159~~ <u>113,423</u>	~~\$11812~~ <u>2</u>	~~\$6,388~~ <u>2</u>	~~\$169,346~~ <u>162,787</u>
Non-Residential	PY21	0.68 4	~~1.401~~ <u>35</u>	~~\$33,205~~ <u>33,050</u>	~~\$64,112~~ <u>64,551</u>	\$17,799	~~\$115,116~~ <u>115,400</u>	~~\$46,766~~ <u>47,295</u>	~~\$108,428~~ <u>107,963</u>	~~\$3842~~ <u>2</u>	~~\$5,680~~ <u>2</u>	~~\$160,912~~ <u>155,301</u>
Non-Residential	PY22	0.68 4	~~1.481~~ <u>45</u>	~~\$24,112~~ <u>23,840</u>	~~\$46,582~~ <u>44,998</u>	\$15,502	~~\$86,196~~ <u>84,340</u>	~~\$37,418~~ <u>37,587</u>	~~\$85,604~~ <u>84,996</u>	~~\$5255~~ <u>2</u>	~~\$4,838~~ <u>2</u>	~~\$127,911~~ <u>122,640</u>
Non-Residential Total		0.68 4		~~\$135,349~~ <u>135,374</u>	~~\$297,396~~ <u>302,408</u>	\$78,549	~~\$511,294~~ <u>516,332</u>	~~\$212,575~~ <u>214,845</u>	~~\$492,401~~ <u>492,561</u>	~~\$30331~~ <u>8</u>	~~\$27,592~~ <u>9</u>	~~\$732,872~~ <u>707,733</u>

Summary of Benchmarking Results

As mentioned in Section 3.2 PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

PECO's engagement strategy reflects the distinct needs of large and small C&I customers. Large businesses often have complex operations and longer decision-making cycles, requiring data-driven targeting, customized solutions, and detailed cost-benefit analyses. Small businesses, by contrast, prioritize simplicity and quick payback, so PECO focuses on streamlined program designs, clear communication, and minimal administrative burden. Additionally, PECO plans to offer small businesses 0% financing to help overcome capital constraints and implement impactful projects. By tailoring approaches to these differences, PECO ensures broad participation in its program design.

Other Information Deemed Appropriate

Not applicable.

3.5 Government/Nonprofit/Institutional Sector

Municipal government, nonprofits, and institutions will have a specific assigned outreach representative for engagement in the prescriptive and custom components of the Non-Residential program. Outreach will coordinate with PECO's economic development, large customer services team and government affairs to work collaboratively to engage and educate these customers on the value of energy efficiency and participation in PECO programs. The CSP will tailor marketing and outreach to reflect the priorities of GNI customers, such as sustainability goals and budget constraints and will implement sector-specific messaging where appropriate. For example, many municipal governments use energy master planning to better understand how they use and manage energy. PECO's outreach team will directly support implementation of those plans using its Non-Residential program incentives.

4. Program Management and Implementation Strategies

This section provides a detailed description of how PECO plans to manage and implement programs, including the approach to, and use of, CSPs. Section 4.1 discusses an overview of PECO's management and implementation strategies, including the organization with CSPs, constraints, milestones, and risks. Section 4.2 includes the executive management structure and the basis for costs. Section 4.3 describes the selected CSPs and the activities they will carry out for Act 129 implementation. Section 4.4 speaks to coordination with other state conservation programs, discussing health and safety, AEPS registration, and collaboration with programs such as the IRA 50121 and 50122 programs.

4.1 Overview of PECO Management and Implementation Strategies

Led by PECO's program management team, each CSP will work closely with the PECO Marketing and Promotions Team, the E&O CSP, and the Exelon Energy Efficiency Marketing Agency to make PECO's energy efficiency programs successful. The responsibilities of each role are described below.

4.1.1 Services to be Provided by PECO, Consultants, Trade Allies, and CSPs

This section describes the services to be provided by key program stakeholders, including PECO Program Managers, PECO's Marketing Team, CSPs, Data Vendors, Evaluators, Trade Allies, and Market Actors.

PECO Program Managers

- Oversee the CSP's performance and service obligations and make sure the CSP's delivery aligns with the approved EE&C Plan.
- Oversee and actively manage the CSP's performance.
- Approve CSP payments (non-incentive payments) on a monthly and annual basis and incentive payments on a weekly or otherwise basis.
- Manage the overall CSP contract.
- Oversee program-level marketing with the CSP in coordination with the PECO marketing and promotions team.
- Work with CSPs to manage and direct the sales process and approach.
- Engage with customers as needed when issues are escalated by the customer, trade ally, and/or CSP.
- PECO Marketing and Promotions Team
- Manage the portfolio's broad awareness campaign with the Exelon Energy Efficiency Marketing Agency and coordinate the implementation CSPs and E&O CSP on advertising and marketing participant engagement strategies.
- Coordinate the education outreach strategy, content, and community event participation.

- Manage and track customer awareness and satisfaction studies.
- Facilitate delivery of premium customer/participant experiences by providing oversight of customer support infrastructure.

Exelon Energy Efficiency Marketing Agency

The Exelon Energy Efficiency Marketing Agency will design and lead the overall advertising plan for all programs. This will include the programs' look and feel, messaging, and advertising channels. The Exelon Energy Efficiency Marketing Agency will coordinate through the PECO senior marketing specialists and CSPs on program-specific materials. (Note: The advertising vendor will not be responsible for identifying and tracking leads. CSPs will identify, follow up with, and track leads).

CSPs

- Deliver energy efficiency savings and associated peak demand reductions on time and on budget while making it easy for customers to participate.
- Maintain high customer satisfaction.
- Develop and adjust program implementation strategies in collaboration with PECO program managers.
- Develop, maintain and support market actor networks (retailers, distributors, contractors, manufacturers, builders, raters, project developers).
- Develop program marketing and coordinate with the PECO Marketing and Promotions team and Exelon Energy Efficiency Marketing Agency for design and consistency in messaging.
- Program outreach and lead generation (including development and distribution of program materials, neighborhood canvassing, trade ally and association networking, customer support infrastructure/lead conversion).
- Manage audits (including customer screening, hiring, training and monitoring of auditors and contractors, measure direct installation, and customer audit reports).
- Distribute efficient measure giveaways or energy kits, if applicable.
- Pick up and recycle appliances (and other equipment), if applicable.
- Process incentives (receive, review, and verify applications and pay rebates).
- Track program performance and implement continuous improvement.
- Report program activities while adhering to PECO and regulatory data reporting requirements and responding to internal or external requests.
- Continuously improve forecasting accuracy.
- Achieve low-income carve-out targets.
- Coordinate with other related activities and partnerships.

- Support any program amendment process should program goals or budget need adjustment to suit the portfolio.
- Provide weekly transactional data to PECO for execution of customer satisfaction survey tools.
- Adapt program implementation strategies to continue program operations and achieve program goals through market disruptions such as changing codes and standards, removal of federal programs such as ENERGY STAR, etc.
- Facilitate AEPS registration process.

Data Vendor

The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques. The data vendor will also collaborate with PECO, CSPs, and evaluators to develop and provide summary and detailed reports.

Evaluator

The independent evaluation contractor is responsible for the portfolio's EM&V and will verify that programs meet goals and are operated consistently with the approved Plan. They will interface with the SWE to confirm measurement and verification protocols are aligned with the state's requirements and periodically provide PECO feedback on the identified areas where delivery performance could be improved. The independent evaluation contractors will also support PECO with semiannual and annual compliance reports.

Trade Allies

Through the right combination of trade ally management, marketing, education, data analytics, and outreach, trade ally networks will be motivated to increase performance and provide valuable feedback for program design and implementation. CSPs will engage existing trade allies and reach out to potential new trade ally participants prior to the start of Phase V to provide a portfolio-wide trade ally database focused on:

- Maintaining active trade ally participation requirement status
- Identifying underperformers to focus campaigns for increased production
- Engaging contractors to participate
- Providing all participating trade allies with program information and announcements

Trade ally outreach may also include monthly program newsletters with updates, quarterly trade ally report cards with metrics, and annual trade ally events to provide education on programs and technologies, sales training, and networking opportunities for those with complementary business models.

Market Actors

The CSPs will engage market actors as partners in program outreach and marketing. Specific market actors and their roles include:

- **Influencers:** Community organizations, associations and influencers that customers follow, join, or rely on for advice. They are trusted partners with unique connections to their constituents – targeted PECO customers. Examples include condominium boards for multifamily tenants and property managers, home care services, community Weatherization Assistance program agencies and food banks serving low-income customers, and HERS Raters and Home Builders Associations for new construction.
- **Contractors and design firms:** Professionals who specify energy and demand savings equipment, sell and install planned or emergency replacement high-efficiency equipment.
- **Distributors and manufacturers:** Stakeholders who stock and price-to-move high-efficiency equipment as well as participants in a residential and non-residential midstream or upstream program component. CSPs will build relationships through national distribution and manufacturer networks, associations, and organizations.
- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Government agencies:** Local township sponsored community events enabling direct customer engagement for cross promotion of multiple programs; recycling centers and township websites encouraging PECO refrigerator and freezer recycling programs; and financial assistance programs that can aid customers along the energy efficiency continuum.

4.1.2 Risk Categories and Risk Mitigation Strategies

Section 3 includes risks for individual programs. There are also risks inherent in the delivery of any energy efficiency portfolio. PECO is taking several key steps to manage those risks:

- Selecting programs that are diversified in design and implementation strategy including some program components that are relatively simple, flexible, and have a history of delivering results in Pennsylvania and other states (e.g., upstream and midstream retail programs) combined with comprehensive program offerings that strive for deeper energy savings.
- Developing a Plan with multiple program components and a broad mix of measures to avoid over-reliance on any single measure.
- Forecasting to exceed the overall energy and demand savings targets to hedge unknown performance across the entire portfolio.

4.1.2.1 Performance Risk

PECO managed performance risk by using a robust CSP RFP process for selecting CSPs with proven experience to implement the approved Plan. PECO used a disciplined RFP evaluation and selection process to support the engagement of experienced CSPs in the delivery of the programs (requiring CSP proposals to demonstrate a proven track record of performance). CSP contracts, where possible, will include performance clauses to establish that CSPs have a strong financial incentive to succeed.

PECO program managers will be responsible for continual oversight of CSP performance against the Plan and will promptly implement corrective actions if goals are not being met. Lastly, PECO will continue to meet with stakeholders and other Pennsylvania EDCs to share learnings and draw on program experience across the state to continuously improve the programs in its portfolio.

4.1.2.2 Technology Risk

The EE&C Plan incentivizes customers for purchasing and installing known technologies and products with established TRM energy and demand savings. The TRM provides the standards for determining the prescriptive or deemed energy savings. Using this approach removes much of the technology risk from the Plan's prescriptive energy efficiency measures and results in a more cost-effective measurement and verification process.

PECO's CSPs will calculate custom project savings on an individual project basis, using the existing (or code-required) equipment as the baseline of energy use. CSPs will conduct pre- and post-inspections, where appropriate, to verify equipment and operating conditions. Incentive payment estimates will be based on standard engineering and energy calculation principles and final payments will be based on the confirmed savings.

An additional technology risk is related to data sharing and cybersecurity. Coordination with external entities and complementary programs introduces the potential for sensitive customer information to be exposed without consistent or clearly defined guidance. As data exchanges become more frequent and complex, particularly when integrating with statewide initiatives with third-party platforms, such as the IRA programs, the risk of unauthorized access or misuse grows.

Mitigation strategies focus on proactive governance and secure practices. PECO will adopt robust, industry-standard data-sharing protocols that prioritize encryption, authentication, and customer consent at every stage of the process. Clear procedures will be implemented to ensure compliance with applicable privacy regulations and internal security policies. Additionally, PECO will actively participate in the PUC working group on data sharing and cybersecurity to align with statewide best practices, anticipate emerging threats, and continuously refine its approach to safeguarding customer information.

4.1.2.3 Market Risk

PECO worked diligently to develop a strong portfolio of programs, benchmarked for success in comparable jurisdictions, and developed with input from key stakeholders. Uncovering barriers

to participation and developing approaches that address these barriers facilitates program success. PECO has gained significant experience and market connections in the process of delivering its Phase I-IV programs. Informed by this experience, some of PECO's strategies to reduce market risk include the following:

- **CSP Collaboration:** PECO developed the Plan collaboratively with CSPs to reduce the risk that the Plan is not achievable in the market environment.
- **Customer Education:** Education and awareness are an integral component of every program. This will include program awareness and the benefits of becoming more energy efficient.
- **Trade Ally Coordination:** All trade allies will be offered training opportunities and provided appropriate materials and technical support. The intent is to facilitate program awareness and knowledge, provide strategies for selling energy efficiency and peak demand reduction to their customers, and educate the trade allies.
- **Program Promotion:** PECO and its contractors will implement a strong promotional advertising campaign to drive awareness and call on customers to act.
- **Product Promotion:** Point-of-purchase materials will be placed in participating retail stores; customers will be able to easily participate using instant rebates.
- **Streamlined Participation:** Program eligibility and streamlined application processes will make participation as easy as possible for customers.

4.1.2.4 Evaluation Risk

PECO will use several strategies to minimize evaluation risk. Eliminating evaluation risk begins with program design to establish that all assumptions and EM&V protocols are agreed upon in advance. PECO will work closely with the SWE to maintain consistent assumptions and processes throughout implementation.

However, there are emerging risks that could impact evaluation outcomes. Changes to regulatory guidance or updates to the TRM may affect claimable savings, introducing uncertainty in compliance verification. Additionally, the potential elimination of the ENERGY STAR program could make verifying the efficiency of certain equipment more challenging, as ENERGY STAR has historically provided a widely accepted benchmark for qualifying products.

To mitigate these risks, PECO's independent EM&V contractor will continue to conduct disciplined verification activities for each program, ensuring that measures receiving incentives are properly installed. PECO and its EM&V contractor will rely on industry standards and state-approved methods for measurement and verification, while adapting processes as needed to address any changes in guidance or program requirements.

4.1.3 Human Resource and Contractor Resource Constraints

Flexibility in resource staffing is needed to effectively implement the EE&C Plan. PECO will manage human resource and contractor resource constraints through deliberate staffing and

training. Each CSP has laid out a succession plan in the event of staff changes, including backups for staff roles.

Internally, the organization will be overseen by PECO's Energy and Marketing Services team and will be further broken out in the marketing department by the following groups: Residential Energy Efficiency programs, C&I programs, Measurement and Verification, Business Planning and Promotions.

4.1.4 Early Warning Systems To Indicate Progress Towards Goals and Process for Adjustment

PECO has several methods for monitoring progress toward goals and ensuring that corrective actions are taken:

- Program managers will closely monitor the programs through direct interface with the CSPs and through the demand side management program tracking database. PECO will develop and monitor performance indicators for each program monthly. Regular review of performance metrics and feedback from CSPs will allow program managers to identify potential issues and take prompt corrective actions.
- Regular program evaluation will identify issues that may impede a program's ability to effectively reach its goals. The EM&V contractor will conduct evaluations to make sure that issues are identified early in the program cycle. It will be the PECO EM&V team's responsibility to confirm that program managers consider recommended improvements and incorporate them into the program design as warranted.
- As part of PECO's ongoing review of program performance, PECO will regularly assess budget distribution to establish that funds are allocated effectively. If monitoring shows adjustments are needed, PECO will take proactive steps, including amending its EE&C Plan as done in Phase IV, to keep program dollars aligned with compliance objectives and customer needs.
- PECO will monitor efforts to update building and appliance codes that may affect the building or equipment baselines and develop strategies to adapt these changes into any affected program's design. Whether there are changes due to codes and standards or evaluation results, PECO will quickly react to actual or potential changes in the TRM to confirm that programs are claiming appropriate energy savings. In addition, changes to TRM measures through IMPs will be actively monitored by PECO and the PECO EM&V team to determine that savings remain accurate and are verified using the most up-to-date guidance.

4.1.5 Implementation Schedule with Milestones

The planned implementation schedule follows:

- **January through March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.

- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

4.1.6 Stakeholder Engagement Overview

PECO plans to regularly engage with stakeholders, including community organizations, groups, and individuals serving low-income populations to help establish that the Plan design is implemented consistently with the vision presented in this Plan. PECO will continue to be an active and engaged participant in PUC-sponsored meetings and activities and will initiate stakeholder input sessions with PECO's customer groups and partners. [PECO will designate a dedicated staff-level coordination lead and establish a formal, stakeholder-informed coordination framework to govern interactions between Residential and Low-Income Act 129 programs and external groups such as home repair, weatherization, and energy efficiency programs as well as governmental or non-profit housing, legal, and direct service providers operating in PECO's service territory.](#)

The CSPs will also engage a variety of organizations such as:

- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Local community-based organizations:** Bucks County Opportunity Council, Delaware and Philadelphia County Housing Authorities, government organizations like Philadelphia Energy Authority, and advocates such as the Housing Alliance.
- **Business and Diversity Networks:** African American Chamber of Commerce of PA, NJ & DE; U.S. Black Chambers / National Black Chamber of Commerce; National Association of Women Business Owners (NAWBO); Small Business Diversity Network (SBDN); Brown Skin Brunchin'.
- **Local and Regional Business Support Organizations:** Penn State Smeal Minority-Owned Business Network; Pennsylvania Events & Small Business Network; Service Corps of Retired Executives (SCORE); Accion U.S. Network. Partners that offer mentoring, workshops, and procurement opportunities; provide access to small business communities and events; and support workforce development through coaching and training resources.

4.2 Executive Management Structure

- This section describes PECO's structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and

financial management, program implementation, procurement, program tracking and reporting, and QA/QC.

Figure 3 includes the management team responsible for implementing PECO's EE&C Plan.

4.2.1 PECO Structure for Addressing Portfolio Strategy

Responsibility for the entire portfolio of programs resides within a single organization, with executive-level leadership provided by the Senior Manager of the Energy Efficiency Portfolio. Individual Managers are assigned responsibility for each market sector and key functional support areas. This executive team is responsible for overall portfolio strategy and planning.

Primary program management is organized by market sector: C&I and residential. Individual program managers are assigned to each program and have overall responsibility for the programs with support from the functional support groups: promotions and marketing, data analytics, business planning, and EM&V. They provide specialized support services to the program managers in the following areas:

- Promotions and marketing coordinates all internal and external communications.
- Business planning is responsible for all financial aspects of the portfolio. This responsibility includes budget and financial management as well as maintaining the portfolio tracking database to provide performance tracking and reporting.
- EM&V oversees the evaluation contractor and interfaces with the SWE as well as leads plan development, filings, and oversees strategic and policy decisions as it pertains to Act 129 compliance and regulatory objectives.

Figure 3. PECO Proposed EE&C Organization



4.2.2 Approach for Overseeing the Performance of CSPs and Other Providers

PECO will oversee CSPs through a comprehensive management, compensation, and evaluation framework designed to facilitate achievement of Act 129 goals and continuous program improvement.

- **Performance-Based Compensation:** A portion of CSP compensation will be tied to verified MWh and MW savings that contribute to achieving regulatory targets (\$/verified MWh and \$/verified MW).
- **Key Performance Metrics and Monitoring:** PECO will incorporate key performance metrics into CSPs contracts including participation, costs, savings, adherence to plan, participant experience, and more. PECO program managers will maintain regular communication with CSPs to review progress, address challenges, and implement changes as needed to support program success.
- **Regular Reporting by CSPs to PECO:** CSPs will share program participation and project status updates with PECO on a regular basis.
- **Independent Evaluation and Customer Feedback:** PECO will assess customer and market actor satisfaction through each program's EM&V process. Independent evaluation contractors will provide PECO with feedback on CSP performance. PECO will use this feedback to inform program adjustment and help the CSPs deliver high-quality programs.
- **Continuous Improvement and Accountability:** PECO's program management approach emphasizes transparency, accountability, and ongoing improvement. CSPs are required to report lessons learned, propose enhancements, and response to evolving market and regulatory requirements. This structure will support CSPs in delivering programs that maximize benefits for PECO customers.

4.2.3 Basis for Administrative Budget (non-incentive costs)

Administrative costs (non-incentive costs) in PY18–PY22 will be factored into the overall portfolio benefit-cost analysis. These costs include all non-incentive costs and are aligned with the budget categories in Table 9 for each program. To determine the administrative budget, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget

go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include:

- **Program Design:** Includes all costs related to designing the Phase VI program, assuming there will be a Phase VI, including updating avoided costs and load shape research. Additionally, program design costs will include research and development (R&D) efforts including those for pilots.
- **Administrative:** Represents costs required to develop, oversee, and execute all programs in the portfolio. These costs include the data vendor contract, PECO legal, IT support, administrative costs related to the data sharing workgroup, and costs related to braided funding support.
- **EDC Delivery Costs:** Represents labor costs for PECO staff to run the programs.
- **CSP Delivery Fees:** Includes all fixed costs to implement the Plan for the Residential Energy Efficiency, HER, and Non-Residential Energy Efficiency programs, as well as costs associated with facilitating AEPS registration.
- **Marketing:** Represents broad marketing, education, and outreach efforts to promote the overall portfolio of energy efficiency and peak demand reduction programs as well as specific and targeted marketing strategies for specific programs and solutions. This will include expenditures on radio, newspaper, social media, and sponsorships promoting the program portfolio.
- **EM&V:** Represents costs associated with third-party independent EM&V for the full portfolio process and impact evaluation activities, including continuous improvement activities.
- **AEPS Registration Support:** Represents costs for the CSP to facilitate the AEPS registration process.
- **Other:** Includes PECO staff training, Conferences such as eSource related to energy efficiency programs, licenses required for successful program implementation and unforeseen circumstances which are possible but cannot be predicted at the time of developing this Plan.

4.3 CSPs

4.3.1 Selected CSPs

PECO issued RFPs and is in the process of selecting and contracting CSPs for implementing and evaluating the Phase V programs. The selected implementation CSPs and independent evaluator, their qualifications, and basis for selection will be shared with the PUC. Each CSP and evaluation contract is deemed confidential and proprietary; each will be filed with the PUC separately. No CSP contract will be effective until approved by the PUC.

4.3.2 Describe the Work and Measures Being Performed by CSPs

CSPs will implement the energy efficiency programs using their experience and capabilities from implementing previous PECO programs and other programs across the country. Each of the selected CSPs will be responsible for implementation services detailed in the individual program descriptions in Section 3.

4.3.3 Describe Any Pending RFPs to Be Issued for Additional CSPs

PECO does not plan to issue any additional RFPs at the time of developing this Plan.

Exelon will look to hire an Energy Efficiency Marketing Agency. This vendor will design and lead the overall advertising plan for Energy Efficiency programs across the Exelon Operating Companies. This will include look and feel, messaging, and advertising channels. The vendor will coordinate with PECO's Promotions Team and CSPs on program-specific materials. The vendor will not be responsible for identifying and tracking leads.

4.4 Coordination with Other State Conservation Programs

As part of its Phase V program plans, PECO will actively collaborate with other state conservation initiatives to maximize impact. These partnerships are essential for delivering the greatest possible value in energy savings and improving customer experience for ratepayers across PECO's service territory.

4.4.1 Collaboration with Other State or Federal Programs to Achieve Savings

Refer to Section 3.1.5 for details about collaboration with non-Act 129 programs.

4.4.2 PECO's Plan to Highlight the Availability of Multiple Funding Sources

PECO's Phase V Plan highlights the availability of multiple funding sources to help customers maximize participation and project impact. To facilitate awareness and accessibility, PECO will engage contractors through targeted outreach and provide education. These strategies are designed to reduce barriers, enhance affordability, and deliver greater value across PECO's service territory.

4.4.3 Process to Facilitate Alternative Energy Portfolio Standards Registration for C&I Participants of Act 129 Programs

PECO is committed to establishing a clear and collaborative process to help C&I participants meet Alternative Energy Portfolio Standards (AEPS) within Act 129 programs. This approach will focus on alignment with regulatory objectives, streamlined participation, and enhanced customer support, with additional details to be defined as program design evolves.

Current planning considerations, active June 1, 2026, include:

- Identifying eligible projects and informing customers of AEPS registration requirements and benefits
- Providing guidance to facilitate AEPS registration
- Coordinating with the PUC, as needed, to enable timely and accurate registration
- Tracking and reporting AEPS-related activities and costs to facilitate transparency and alignment with regulatory obligations

4.4.4 Plans to Address Health and Safety Issues that Arise in the Delivery of Act 129 Services

PECO recognizes the importance of addressing health and safety barriers to ensure equitable access to energy efficiency programs for residential customers. As part of the broader Phase V Residential Energy Efficiency portfolio, the program will allocate up to \$3,000,000 to fund health and safety measures for low-income households. [PECO will not impose a standard per-household cap on health and safety spending for its Act 129 program in Phase V. Rather, PECO will assess health and safety needs on an individual basis while considering the available Phase V Health and Safety budget.](#)

The program will take proactive steps during a customer's in-home appointment. Energy advisors will identify any obstacles that could prevent the installation of energy efficiency measures such as electrical safety concerns, combustion issues, mold, or asbestos and may install safety devices, such as a smoke/carbon monoxide detector, when appropriate. By addressing these issues, the program ensures that homes are not deferred from participation due to such barriers.

To make participation accessible for all, the program will provide bilingual energy advisors and translation services when needed, assisting customers whose primary language is not English. Additionally, to support individuals with different abilities, the program will confirm during scheduling that customers with special needs have a trusted friend or relative present during service. This approach ensures every customer receives the full benefits of the program.

4.4.5 Strategies to Collect Information about Dual Participation to Facilitate Accurate Reporting on Braided Funding Opportunities and Calculation of the "Leverage Ratio" by Program.

In alignment with the Phase V Final Order, PECO will implement strategies to accurately capture and report instances of dual participation across programs. This effort is critical for identifying braided funding opportunities and ensuring compliance with reporting requirements. PECO's approach will include enhanced data-sharing protocols, coordination with state agencies, and stakeholder engagement to support transparent calculation of the "Leverage Ratio" by program.

5. Reporting and Tracking Systems

This section describes the reporting and critical data management and tracking systems PECO will use to implement programs, and which the PUC and PECO's evaluation contractor will need to access. Section 5.1 will include reporting done by PECO to the SWE, including an example proposed schedule for PY18 and PY19. Section 5.2 details the proposed project management tracking systems, such as how data will be handled, how CSPs will integrate with the tracking system, how the Commission and SWE would access this data, and what protocols are in place for handling personal identifiable information (PII).

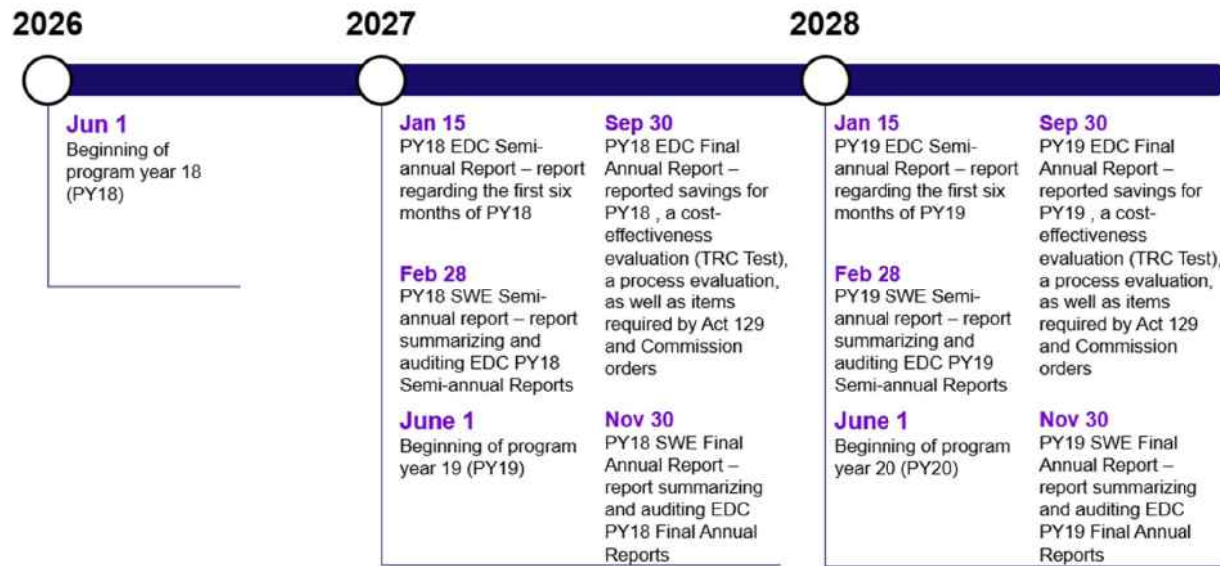
5.1 Reporting

The evaluation contractor will be responsible for interfacing with the SWE to determine the required data collection and reporting requirements and confirm that all data collection and reporting requirements are satisfied by the data vendor and CSPs.

The evaluation contractor will support development of PECO's semiannual and annual reports as prescribed in the Phase V Final Order for each program year of Phase V:

- **Semiannual Reports:** These reports capture program activity for the first half of each program year and are filed by January 15 of each year.
- **Annual Reports:** These final annual reports will be filed no later than September 30th, 120 days after the end of each full program year. Final annual reports for each program year will include reported and verified savings, a cost-effectiveness evaluation (total resource cost [TRC] test), process evaluation results, and items required by Act 129 and PUC orders. In addition, PECO will provide information on coordination metrics regarding referrals with non-Act 129 programs.
- **Reporting Schedule:** All PECO Act 129 EE&C Phase V reports will be filed with the PUC's Secretary's Bureau, with a copy provided to the SWE. Further, all reports will be posted to the PECO website. Reporting for each program year of Phase V will follow the example proposed schedule for PY18 and PY19 outlined in the Phase V Final Order:

Figure 4. Proposed Schedule for PY18 and PY19



5.2 Project Management Tracking Systems

This section presents the data management system requirements that PECO anticipates will meet internal and external (SWE) needs.

5.2.1 Data Tracking System Overview

PECO's data tracking system collects and stores comprehensive and consistent program and invoice data from CSPs. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will also support PECO's QA process and EM&V requirements. Protecting sensitive data, personally identifiable information, personal information, intellectual property, and data from theft and damage is integrated into PECO's data management process.

The data tracking system includes a user interface for entering, reviewing, and extracting program and invoice data. The data tracking system will support PECO's tracking of:

- Incentives paid
- Reported kilowatt-hours and kilowatts achieved
- Implementation costs
- Administrative costs

PECO's data management tracking system and approach to data management will facilitate consistent data inputs across the different CSPs throughout Phase V. There are four key contributors/users involved with data tracking, each with an important role in ensuring tracking data quality:

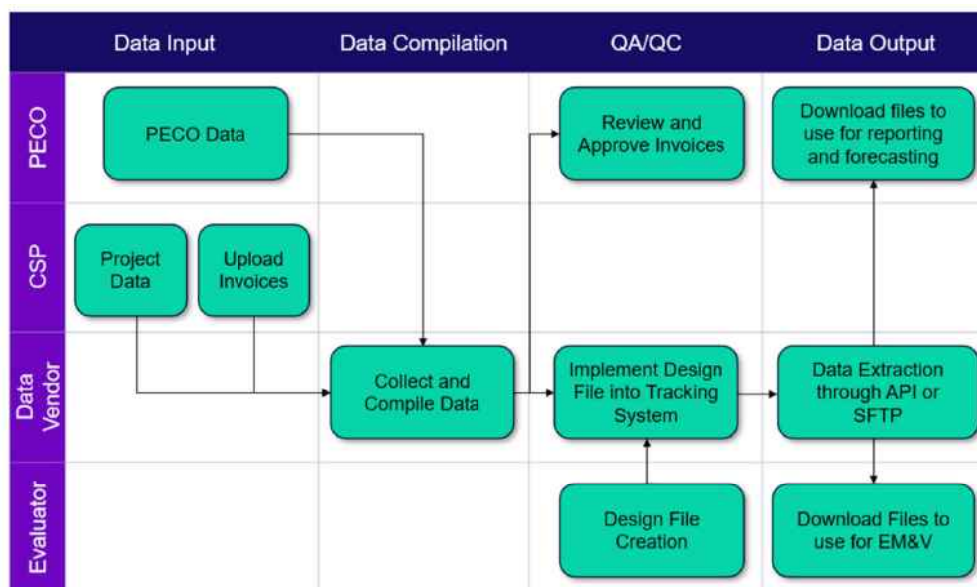
- **Database Vendor:** The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques.
- **CSPs:** CSPs will be responsible for inputting program data into the tracking database in accordance with the data protocols.
- **PECO Program Managers:** PECO program managers will track and review data for their individual programs.
- **Evaluator:** The evaluation contractor will conduct process and impact evaluations for each program. These evaluations will review the tracking data inputs for accuracy and adherence to data protocols, produce verified savings estimates and provide recommendations for program improvement. The evaluation contractor will provide a design file to the data vendor ahead of Phase V with data completeness, consistency, and accuracy checks. CSPs are required to update data that does not pass the design file criteria.

Figure 5 depicts the data management, QA, and evaluation processes that PECO, the data vendor, CSPs, and independent evaluation contractor will use to facilitate accurate data tracking.

5.2.2 Software Format, Data Exchange Format, and Database Structure

The data tracking system will interact with PECO's existing systems. PECO will provide an initial population of customer, premises, and account data that will be used to qualify customers for programs. Additional data will be entered by the implementation CSP or PECO to complete the application process. PECO will provide a full set of customer data information on a regular basis to update implementation CSP records.

Figure 5. Program Documentation and EM&V



PECO's approach addresses five areas critical to ensuring program implementation quality:

1. **Selection of CSPs that implement programs:** PECO is in the process of selecting and contracting CSPs with demonstrated experience implementing data management protocols and a commitment to maintaining data quality and integrity. Contracts will be awarded based on a pay for performance contracting mechanism.
2. **Program implementation and documentation protocols:** PECO and the CSPs will develop specific protocols and procedures for each program. These will govern all aspects of the program implementation, from procedures for conducting site visits to data input.
3. **Verification and documentation of activities and savings:** Verification of project eligibility and actual installation of measures is important. Documentation of purchases and installations will confirm that programs are implemented in top quality fashion and will provide the basis for defensible program evaluations.
4. **Program evaluation:** PECO will contract an experienced EM&V vendor to conduct an independent assessment of each program's performance. This contractor will develop a comprehensive evaluation plan for conducting process and impact evaluations. The EM&V contractor will work with the SWE to confirm that the evaluations are conducted according to state requirements.
5. **Evaluation-based program adjustments:** PECO will use the findings and recommendations resulting from the impact and process evaluations to adjust program implementation as necessary to confirm the programs are implemented in accordance with recognized best practices, maintain participant satisfaction, and contribute to PECO's successful attainment of its portfolio savings goals.

5.2.3 Describe How CSPs Will Integrate with the Tracking System

CSPs will have a secure log-in to access the tracking system. After logging in, the CSP can enter and submit projects (with required data) for PECO's review, approval, or request for additional information or modifications. Following any required revisions and PECO's approval of a submitted project, projects are maintained within the tracking system.

CSPs will enter information into the tracking system for individual projects and through batch-methods for several projects. Project batches will typically be associated with monthly invoices. CSPs will interact with the tracking system on a monthly basis or more frequently.

The project data submitted and updated by CSPs includes but is not limited to:

- Measure information and equipment specifications
- Inputs for deemed or partially deemed TRM calculations
- Reported savings
- Project status
- Invoices, including project costs and incentives
- Other project details stored in files and not directly entered into a tracking system (e.g., PDFs for custom C&I projects)
- Customer data from PECO's internal customer care and billing system

5.2.4 Access for Commission and SWE

PECO's energy efficiency information will be available for review by the PUC and SWE upon request. As part of the customer validation process for application enrollment, PECO will provide select customer account data to the data management system vendor. This data is highly confidential and must be protected against unauthorized access or disclosure. In addition, all data collected from CSPs related to PECO's programs will be considered confidential and subject to the same protections. Security processes and protocols will be established to secure all data from unauthorized access. PECO and the data management system vendor will jointly develop processes for data backup and disaster recovery.

5.2.5 PECO Cybersecurity Procedures to Protect Program Participant Personally Identifiable Information

As part of Phase V cybersecurity planning, PECO is actively participating in the Act 129 Phase V Data Sharing Working Group, convened by the Pennsylvania PUC under the Phase V Final Order. The group addresses critical topics related to secure data sharing among program administrators, including:

- Inventorying current data-sharing processes
- Identifying data types and associated benefits
- Establishing customer consent requirements
- Developing guidelines for third-party CSPs
- Drafting a standardized Memorandum of Understanding
- Recommending secure storage and exchange protocols (e.g., push vs. pull methods)
- Determining allocation of administrative costs

The initial meeting on July 23, 2025, focused on understanding data needs and sharing expectations among EDCs, the PA DEP, and Commission staff. These discussions also explore safeguarding participant PII, leveraging categorical eligibility, and best practices for collaboration with the PA DEP and Home Energy Rebates programs. PECO will incorporate guidance from the Working Group into its Phase V cybersecurity procedures to support robust data protection and compliance.

6. QA and EM&V

This section explains PECO's approach to EM&V and QA/QC, and how these processes align with SWE activities. Section 6.1 outlines the overall QA/QC strategy and actions for continuous improvement. Section 6.2 details procedures for installation verification, savings documentation, and QC. Section 6.3 describes how PECO will incorporate feedback from participants, contractors, and trade allies. Section 6.4 covers market and process evaluations to assess program effectiveness. Section 6.5 addresses coordination of EM&V activities with the SWE, and Section 6.6 explains how PECO integrates changes to codes and standards into program operations.

6.1 Overall Approach to QA/QC

To implement the programs and solutions in this Plan, PECO will leverage the experience of program implementation professionals by selecting CSPs with the following qualifications:

- Demonstrated experience implementing programs for the specific target market associated with the program.
- Demonstrated understanding of the measures and features of the program and solutions the CSP will implement.
- Existing relationships and experience establishing relationships with upstream equipment suppliers and contractors, as appropriate for the program.
- Experience in providing or coordinating training by other qualified providers about the program, solutions, and measures to delivery channels (e.g., equipment suppliers, contractors, auditors) and the target participant market.
- Capabilities for processing incentives.

The CSPs' approach to QC and continuous improvement will include:

- **Program tracking:** Scorecards, weekly and monthly forecasting reports, and operations meetings will be used to monitor and track program progress against program goals and metrics. The scorecards will be reviewed monthly to provide updates and identify action items to keep the program on track.
- **Responding to customers:** Contractor and trade ally feedback is important. CSPs will have a tiered response procedure to facilitate delivery of the highest level of customer support. Any suggestions or complaints are logged into their customer contact log and resolved at the appropriate level. Complaints are escalated as required following a deliberate and documented process.
- **Equipment installation inspections:** CSPs will conduct random targeted in-process and post inspections while ensuring the quantity of inspections are distributed fairly among the program segments according to their most recent performance. Post inspections will include client interviews and a methodical visual inspection (where possible and feasible) to verify that measures have been installed correctly and as reported. Post inspections will also confirm that those measures comply with program specifications and that those measures are serving their intended function. This enables personnel to understand and comply with program requirements and provides an opportunity to address any deficiencies early on. Post inspections will be performed as

soon as possible after completion of work in a home or building. Prompt QA/QC follow-up creates a greater likelihood of customer cooperation, identify missed opportunities for further improvements, and reinforces the importance of quality and customer satisfaction in the programs. Finally, inspectors will review the appropriateness and accuracy of recommendations made by energy advisors and others.

PECO will also use the experience of an independent EM&V contractor who will conduct unbiased estimations of verified gross energy impacts on all programs. Estimations of verified gross energy impacts will be based on statistically significant verified savings measured as described in the EM&V contractor's EM&V plan, developed prior to Phase IV program implementation.

The contractor's EM&V plan will contain a detailed evaluation methodology for each program, including definition of the impact and process evaluation methods, and the data needed to support them (design file). The EM&V plan will provide the implementation CSP with the data to track and the Database Vendor with the data to house. Having the evaluation plan completed and available to PECO and CSP staff for each program will help establish that the implementers maintain appropriate and high-quality records so that savings can be verified.

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

Although the procedures for measure and project installation verification, QA and QC, and savings documentation will vary by program and measures, PECO anticipates independent evaluation contractors applying the following process to impact evaluations:

1. Choose a random sample of participants for evaluations, using statistical methods consistent with established state protocols.
2. Conduct verifications onsite, by phone, or via online survey instrument, tailored to the measure and program type.
3. Gather pre-evaluation data and prepare data collection documents.
4. Verify measure and project installation and collect pertinent data such as equipment nameplate.
5. Cross-reference equipment data with customer application data contained in the data management system for accuracy.
6. Observe and note equipment operational tests and quality of the equipment installation:
 - a. For prescriptive measures, calculate measure savings using the methodologies and algorithms detailed in the TRM.
 - b. For custom measures, use energy simulation modeling (such as eQuest or DOE-2) or pre-/post-measure metering to determine measure savings.

6.3 Process for Collecting and Addressing Participant, Contractor, and Trade Ally Feedback

PECO anticipates applying the following general process to collect participant, contractor, and trade ally feedback:

- Independent evaluation contractors will interview contractors, trade allies, and other market actors to gauge their satisfaction with PECO's programs and identify areas for improvement.
- Independent evaluation contractors will identify the appropriate survey mode (e.g., telephone, in-person, or online) for capturing participant feedback.
- Independent evaluation contractors will survey a random sample of participants to gather fast program feedback and assess satisfaction with the program.
- Independent evaluation contractors will follow all guidelines outlined in the existing daily load shifting guidance provided as well as the SWE Evaluation Framework for Phase V.

6.4 Market and Process Evaluations

CSPs will regularly evaluate their programs to help maintain best practices and continually improve. Additionally, PECO's independent evaluation contractors will conduct annual market and process evaluations for each program throughout the program's entirety. Market and process evaluations may include program materials review, tracking database analysis, implementation team interviews, surveys or interviews with participating and nonparticipating customers, contractors, and trade allies.

- Market and process evaluations will examine:
 - Program design
 - Implementation protocols and procedures
 - Marketing materials and strategies
 - Outreach and recruitment activities
 - Documentation and compliance with incentive eligibility requirements
 - Processing and timely payment of incentives
 - Market characteristics
 - Net energy and demand savings

PECO will use process evaluation results to improve program design (e.g., modify measures offered, eligibility requirements) and implementation procedures (e.g., modify recruitment, advertising methods, monitoring, database maintenance). The frequency and schedule of the process evaluations will be determined for each program individually.

6.5 Strategy for Coordinating with SWE

PECO's EM&V manager and its independent evaluation contractor will engage with the SWE through scheduled working group meetings and through ad hoc meetings and communications. Throughout Phases I-IV, PECO worked with the SWE to determine that its program evaluations aligned with PUC requirements, clarified policy questions, and contributed data and recommendations to assist the SWE and the PUC to establish policy. PECO anticipates extending this productive relationship in Phase IV.

To the extent feasible and appropriate, PECO will consult with the SWE to establish that its data management system contains information relevant and needed for evaluation of the

programs. It also will confirm that PECO's EM&V contractor uses the most appropriate methods for determining the impacts of the EE&C Plan's programs.

6.6 Approach to Incorporating Changes to Codes and Standards

PECO recognizes that changes to federal, state, and local codes and standards can significantly impact the calculation of energy savings and the design of energy efficiency programs. As such, throughout Phase V, PECO and its CSPs will proactively monitor regulatory developments and updates to codes and standards as feasible that may influence baseline assumptions, measure eligibility, or program effectiveness.

7. Cost Recovery Mechanism

The objective of this section is to provide detailed descriptions and estimated values for the cost recovery mechanism. Section 7.1 summarizes total annual revenues for Phase V. Section 7.2 discusses Phase V in accordance with Pennsylvania cost recovery laws. Section 7.3 includes relevant data tables supporting the cost recovery analysis. Section 7.4 addresses tariffs and the Section 1307 cost recovery mechanism. Finally, Section 7.5 discusses ensuring that recovery of Act-129 activities align to the customer class receiving the benefit and Section 7.6 outlines how PECO aims to account for Phase V costs versus prior phase costs, ensuring transparency and compliance with regulatory requirements.

7.1 Total Annual Revenues for Phase V

PECO's annual retail revenue as of December 31, 2006, totals \$4,273,858,275. Applying the 2% annual limit set forth in Act 129 to this amount produces a total allowable annual level of expenditures of \$85,477,166 per year or ~~\$427,385,828~~ 427,385,830 over the five program years of the Phase V Plan.

Figure 6 details how the total 2006 annual retail revenues were derived.²⁶³⁴ The electricity sales from all of PECO's customers (FERC Accounts 440.0 through 446.0) and other operating income (FERC Accounts 450.0 through 456.1) were summed. In addition, as required by the Phase V Final Order, the total annual retail revenue was adjusted to include "...generation revenues collected by an EDC for an electric generation supplier (EGS) that use consolidated billing." The revenues thus derived were then adjusted to remove several "non-retail" (i.e., wholesale) revenue items, which include, sales for resales (447.0), other electric revenues (456.0) and revenues from wholesale transmission (456.1).

Figure 6. Calculation of 2006 Annual Revenue

Amount	Description
\$4,371,215,020*	Total revenue as of 12/31/06
\$92,390,366†	Adjustment for "shopping" customers
\$(189,747,111)‡	Wholesale revenue adjustment
\$4,273,858,275§	Total retail revenue
\$85,477,166	Annual spend (2% of revenue)
~~\$427,385,828~~ <u>427,385,830</u> #	Five-year total spend

*Source: PUC Annual Report-400 Income Statement

† Source: PECO records

‡ Source: PUC AR Accounts 447, 456.0, 456.1

§ Sum of total revenue, adjustment for "shopping" customers, and wholesale revenue adjustment

|| Total retail revenue times 0.02

Annual spend times five program years

²⁶³⁴ The calculation is based on Schedule 400 - Income Statement contained in PECO's 2006 Electric Annual Revenue Report to the PUC.

7.2 Description of Phase V Plan in Accordance with 66 Pa. C.S. § 1307 and 2806.1

Act 129 requires that the EE&C Plan include a cost recovery mechanism to fund EE&C measures and to facilitate the recovery of prudent and reasonable costs, including administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(H). Act 129 also requires an analysis of administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(K). The Phase V Final Order defines administrative costs as including but are not limited to, costs relating to plan and program development, CSP non-incentive program delivery fees, cost-benefit analysis, measurement and verification and reporting.²⁷³⁵ Based on this definition, PECO's EE&C Phase IV administrative costs (e.g., non-incentive costs) include those as described in Section 4.2.3.

²⁷³⁵ EE&C Phase V Final Order, p. 233.

7.3 Data Tables

Table 38. Budget by Program and Subprogram

Residential ~~Energy Efficiency~~							
Total Budget (\$000)		\$14,73	\$15,01	\$15,32	\$15,58	\$15,8401	\$76,493
		813,709	514,601	115,949	017,317	4,917	
Incentives (\$000)	Rebates	\$4,976	\$5,199	\$5,467	\$5,741	\$6,0375	\$27,419
		4,317	4,940	5,862	6,805	496	
	Upstream/Midstream Buydown	\$1,787	\$1,837	\$1,887	\$1,887	\$1,8871	\$9,285
		1,418	1,681	2,121	2,560	505	
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
Non-Incentives (\$000)	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$8,089	\$8,366	\$8,671	\$8,929	\$9,192.4	\$43,248
		07,060	47,952	19,300	310,667	8,270	
	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912
	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245
Percent Incentives		5652%	5554%	5658%	5762%	5755%	5857%

Residential Home Energy Reports							
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0

Other- ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives	0%	0%	0%	0%	0%	0%

Low-Income Energy Efficiency							
Total Budget (\$000)		\$10,870	\$11,028	\$11,394	\$11,754	\$10,160	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$855	\$855	\$855	\$855	\$855	\$4,273
	Direct Install Materials & Labor	\$6,442	\$6,589	\$6,926	\$7,256	\$5,787	\$33,000
	Braided Funding Support Labor	\$19	\$19	\$19	\$19	\$19	\$96
	Incentive Total	\$7,850	\$7,995	\$8,334	\$8,667	\$7,194	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other- ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167
Percent Incentives		72.73%	72.73%	73.74%	74%	71.69%	73%

Income-Eligible Home Energy Reports							
Total Budget (\$000)		\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other- ~~(Describe)~~	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$172	\$91	\$95	\$85	\$81	\$524
Percent Incentives		0%	0%	0%	0%	0%	0%

Non-Residential Energy Efficiency		Total					
Total Budget (\$000)		\$34,181	\$41,904	\$47,195	\$61,004	\$39,614	\$213,898
		4,179	2,508	7,045	0,850	9,342	3,923
Incentives (\$000)	Rebates	\$16,170	\$21,372	\$23,975	\$27,619	\$19,062	\$108,198
		6,168	2,512	4,396	7,998	9,270	0,345
	Upstream/Midstream Buydown	\$913	\$1,062	\$1,159	\$1,040	\$973	\$5,148
			7	056	8	888	2
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$4,022	\$4,534	\$4,825	\$4,546	\$4,077	\$22,004
			093	356	105	683	258
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
Incentive Total		\$21,105	\$26,968	\$29,959	\$33,205	\$24,112	\$135,349
		1,103	7,572	9,808	3,050	3,840	5,374
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other-(Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total		\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549
Percent Incentives		62%	64.65%	63%	65%	61%	63%

Table 39. Summary of EE&C Costs by Sector and Program

(Description)														
Residential Portfolio (incl. Low-Income)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$163,165	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Income-Eligible Low-Income Energy Efficiency	\$34,330,888 <u>834,157,402</u>	\$0	\$0	\$0	\$9,219,672 <u>9,219,670</u>	\$3,073,224 <u>3,073,225</u>	\$0	\$0	\$0	\$46,623,784 <u>6,450,297</u>	\$646,730	\$157	\$3,886,241 <u>4,614,121</u>
	Income-Eligible Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total	\$77,172,239 <u>576,998,749</u>	\$0	\$0	\$0	\$48,223,067 <u>948,223,067</u>	\$11,265,135 <u>11,265,136</u>	\$0	\$0	\$0	\$136,660,438 <u>136,486,952</u>	\$296,301	\$138,139	\$1,434,589 <u>1,462,398</u>
Small C&I	Non-Residential Energy Efficiency	\$66,587,234 <u>264,986,024</u>	\$0	\$0	\$0	\$34,814,664 <u>534,814,664</u>	\$1,155,777	\$0	\$33,423	\$0	\$102,591,096 <u>100,989,888</u>	\$232,236	\$70,72	\$1,458,638 <u>1,473,492</u>
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Income-Eligible Low-Income Energy Efficiency	\$2,854,674 <u>2,941,417</u>	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574 <u>378,317</u>	\$472,488	\$23,21	\$3,400,476 <u>2,687,652</u>
	Sector Total	\$69,645,338 <u>868,130,873</u>	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$107,367,377 <u>105,852,912</u>	\$237,242	\$69,71	\$1,497,440 <u>1,506,333</u>
Large C&I	Non-Residential Energy Efficiency	\$68,761,640 <u>570,388,160</u>	\$0	\$0	\$0	\$41,142,530 <u>141,142,530</u>	\$1,363,220	\$0	\$39,327	\$0	\$111,306,722 <u>112,933,237</u>	\$209,206	\$69	\$1,157,362 <u>1,139,321</u>
	Residential Energy	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577

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	Efficiency													
	Income- Eligible Low-In come Energy Efficiency	\$2,854,674 <u>2,941,417</u>	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574 <u>378,317</u>	\$472,488	\$2321	\$3,400,476 <u>2,687,652</u>
	Sector Total	\$71,819,75 <u>473,533,009</u>	\$0	\$0	\$0	\$42,430,978	\$1,792,947 <u>792,948</u>	\$0	\$39,327	\$0	\$116,083,003 <u>117,796,261</u>	\$214,211	\$6968	\$1,190,108 <u>1,167,948</u>

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Table 40. Allocation of Common Costs to Applicable Customer Sector

		(Includes Municipal Lighting)			
Marketing	\$20,400,000	Sector allocations based-fraction of PY18 First Year MWh Savings	\$7,592,6596,382,568	\$6,379,0706,152,692	\$6,428,2717,864,741
Administrative	\$4,700,000	Sector allocations based-fraction of PY18 First Year MWh Savings	\$1,749,2891,470,493	\$1,469,6881,417,532	\$1,481,0231,811,975
Program Design	\$8,540,0008,514,690	Sector allocations based-fraction of PY18 First Year MWh Savings	\$3,178,4962,663,999	\$2,670,4542,568,052	\$2,691,0513,282,639
EM&V	\$19,600,000	Sector allocations based-fraction of PY18 First Year MWh Savings	\$7,294,9086,132,271	\$6,128,9115,911,410	\$6,176,1827,556,320
EDC Delivery Costs	\$11,035,01211,035,010	Sector allocations based-fraction of PY18 First Year MWh Savings	\$4,107,1123,452,534	\$3,450,6433,328,187	\$3,477,2574,254,289
Other- (Describe) Other ¹	\$3,000,000	Sector allocations based-fraction of PY18 First Year MWh Savings	\$1,116,568938,613	\$938,099904,808	\$945,3341,156,580
Totals	\$67,275,01267,249,700		\$25,039,03221,040,478	\$21,036,86420,282,680	\$21,199,11725,926,542
SWE Cost	\$0		\$0	\$0	\$0

¹ Includes training, conferences, licenses, travel, and critical contract costs

Table 41. Summary of Portfolio EE&C Costs

Residential (Including Low-Income)	\$136,660,438136,486,952	\$25,039,03221,040,478	\$161,699,470157,527,430
Small C&I	\$107,322,978105,852,914	\$21,036,86420,282,680	\$128,359,841126,135,594
Large C&I	\$116,127,403117,796,262	\$21,199,11725,926,542	\$137,326,519143,722,804
Totals	\$360,110,819360,136,128	\$67,275,01267,249,700	\$427,385,831427,385,830

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Table 42. TRC Benefits Table (Gross)

GrossNet												
Residential Energy Efficiency	PY18	1.00	0.930.91	\$8,0897,060	\$47,65637,412	\$6,649	\$62,39351,121	\$15,88212,910	\$31,65325,446	\$10,1808,386	\$0	\$57,71546,742
Residential Energy Efficiency	PY19	1.00	0.91	\$8,3667,952	\$48,06343,940	\$6,649	\$63,07858,541	\$15,38314,229	\$31,55229,101	\$10,4229,698	\$0	\$57,35753,027
Residential Energy Efficiency	PY20	1.00	0.77	\$8,6719,300	\$58,37466,073	\$6,650	\$73,69582,023	\$15,37617,089	\$30,81534,389	\$10,77711,903	\$0	\$56,96863,380
Residential Energy Efficiency	PY21	1.00	0.75	\$8,92910,667	\$58,41379,378	\$6,650	\$73,99296,695	\$15,26719,844	\$29,26038,458	\$11,00314,200	\$0	\$55,53172,502
Residential Energy Efficiency	PY22	1.00	0.74	\$9,1928,270	\$58,45247,580	\$6,647	\$74,29262,498	\$14,91712,601	\$29,03424,312	\$11,2699,508	\$0	\$55,22046,421
Residential Energy Efficiency Total		1.00	0.810.80	\$43,248	\$270,957274,384	\$33,245	\$347,450350,877	\$76,82576,672	\$152,315151,705	\$53,65253,695	\$0	\$282,792282,073
Residential Home Energy Reports	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.00	4.49	\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.00	1.371.35	\$7,8507,981	\$3,1761,874	\$3,020	\$14,04712,875	\$3,4673,273	\$13,31212,094	\$2,4771,980	\$0	\$19,25717,347
Low-Income Energy	PY19	1.00	1.371.35	\$7,9958,152	\$3,1741,837	\$3,033	\$14,20213,02	\$3,2923,112	\$13,63812,3	\$2,5302,022	\$0	\$19,46017,52

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Low-Income Energy Efficiency	PY20	1.00	~~1.36~~ <u>1.33</u>	~~\$8,334~~ <u>\$8,493</u>	~~\$3,124~~ <u>\$1,769</u>	\$3,060	~~\$14,519~~ <u>\$13,322</u>	~~\$3,301~~ <u>\$3,124</u>	~~\$13,777~~ <u>\$12,531</u>	~~\$2,612~~ <u>\$2,090</u>	\$0	~~\$19,691~~ <u>\$17,745</u>
Low-Income Energy Efficiency	PY21	1.00	~~1.31~~ <u>1.29</u>	~~\$8,667~~ <u>\$8,691</u>	~~\$3,080~~ <u>\$1,728</u>	\$3,087	~~\$14,834~~ <u>\$13,506</u>	~~\$3,254~~ <u>\$3,056</u>	~~\$13,550~~ <u>\$12,184</u>	~~\$2,699~~ <u>\$2,141</u>	\$0	~~\$19,503~~ <u>\$17,381</u>
Low-Income Energy Efficiency	PY22	1.00	~~1.27~~ <u>1.23</u>	~~\$7,194~~ <u>\$6,722</u>	~~\$3,261~~ <u>\$2,140</u>	\$2,966	~~\$13,421~~ <u>\$11,828</u>	~~\$2,748~~ <u>\$2,508</u>	~~\$11,787~~ <u>\$10,091</u>	~~\$2,548~~ <u>\$1,952</u>	\$0	~~\$17,083~~ <u>\$14,551</u>
Low-Income Energy Efficiency Total		1.00	~~1.34~~ <u>1.31</u>	\$40,040	~~\$15,816~~ <u>\$9,347</u>	\$15,167	~~\$71,023~~ <u>\$64,554</u>	~~\$16,063~~ <u>\$15,072</u>	~~\$66,064~~ <u>\$59,294</u>	~~\$12,867~~ <u>\$10,186</u>	\$0	~~\$94,994~~ <u>\$84,552</u>
Low-Income Home Energy Reports	PY18	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.00	~~7.01~~	\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	1.00	~~1.56~~ <u>1.50</u>	~~\$21,105~~ <u>\$21,103</u>	~~\$78,457~~ <u>\$78,459</u>	\$13,076	\$112,638	\$52,133	\$116,672	\$36	~~\$7,072~~ <u>\$2</u>	~~\$175,913~~ <u>\$168,844</u>
Non-Residential Energy Efficiency	PY19	1.00	~~1.57~~ <u>1.47</u>	~~\$26,968~~ <u>\$27,572</u>	~~\$101,443~~ <u>\$108,485</u>	\$14,936	~~\$143,347~~ <u>\$150,993</u>	~~\$64,384~~ <u>\$65,867</u>	~~\$152,603~~ <u>\$155,479</u>	~~\$104~~ <u>\$109</u>	~~\$8,550~~ <u>\$3</u>	~~\$225,640~~ <u>\$221,458</u>
Non-Residential Energy Efficiency	PY20	1.00	~~1.40~~ <u>1.33</u>	~~\$29,959~~ <u>\$29,808</u>	~~\$129,049~~ <u>\$131,215</u>	\$17,236	~~\$176,244~~ <u>\$178,259</u>	~~\$71,161~~ <u>\$71,977</u>	~~\$166,875~~ <u>\$165,799</u>	~~\$172~~ <u>\$178</u>	~~\$9,338~~ <u>\$3</u>	~~\$247,546~~ <u>\$237,957</u>
Non-Residential Energy Efficiency	PY21	1.00	~~1.47~~ <u>1.41</u>	~~\$33,205~~ <u>\$33,050</u>	~~\$109,050~~ <u>\$109,621</u>	\$17,799	~~\$160,055~~ <u>\$160,470</u>	~~\$68,362~~ <u>\$69,134</u>	~~\$158,497~~ <u>\$157,817</u>	~~\$56~~ <u>\$61</u>	~~\$8,303~~ <u>\$3</u>	~~\$235,217~~ <u>\$227,015</u>
Non-Residential Energy Efficiency	PY22	1.00	~~1.57~~ <u>1.54</u>	~~\$24,112~~ <u>\$23,840</u>	~~\$79,227~~ <u>\$76,785</u>	\$15,502	~~\$118,840~~ <u>\$116,127</u>	~~\$54,697~~ <u>\$54,944</u>	~~\$125,133~~ <u>\$124,246</u>	~~\$75~~ <u>\$80</u>	~~\$7,072~~ <u>\$2</u>	~~\$186,977~~ <u>\$179,272</u>
Non-Residential Energy Efficiency Total		1.00	~~1.51~~	~~\$135,349~~ <u>\$135,374</u>	~~\$497,226~~ <u>\$504,565</u>	\$78,549	~~\$711,124~~ <u>\$718,488</u>	~~\$310,737~~ <u>\$314,055</u>	~~\$719,780~~ <u>\$720,013</u>	~~\$443~~ <u>\$465</u>	~~\$40,333~~ <u>\$14</u>	~~\$1,071,293~~ <u>\$1,034,546</u>
Total		1.00		~~\$218,637~~ <u>\$218,663</u>	~~\$783,999~~ <u>\$788,296</u>	\$141,473	~~\$1,144,110~~ <u>\$1,148,432</u>	~~\$427,081~~ <u>\$429,255</u>	~~\$981,233~~ <u>\$974,087</u>	~~\$66,962~~ <u>\$64,346</u>	~~\$40,333~~ <u>\$14</u>	~~\$1,515,610~~ <u>\$1,467,702</u>

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Table 43. TRC Benefits Table (Net)

Residential Energy Efficiency	PY18	0.655	~~0.88~~ 0.86	~~\$8,089~~ 7,060	~~\$28,435~~ 22,078	\$6,649	~~\$43,173~~ 35,787	~~\$10,406~~ 8,459	~~\$20,739~~ 16,672	~~\$6,670~~ 5,495	\$0	~~\$37,815~~ 30,626
Residential Energy Efficiency	PY19	0.655	~~0.86~~ 0.85	~~\$8,366~~ 7,952	~~\$28,606~~ 26,048	\$6,649	~~\$43,621~~ 40,649	~~\$10,079~~ 9,323	~~\$20,673~~ 19,067	~~\$6,829~~ 6,354	\$0	~~\$37,580~~ 34,743
Residential Energy Efficiency	PY20	0.655	0.74	~~\$8,671~~ 9,300	~~\$35,257~~ 40,085	\$6,650	~~\$50,577~~ 56,034	~~\$10,074~~ 11,196	~~\$20,190~~ 22,532	~~\$7,061~~ 7,799	\$0	~~\$37,325~~ 41,527
Residential Energy Efficiency	PY21	0.655	0.72	~~\$8,929~~ 10,667	~~\$35,193~~ 48,331	\$6,650	~~\$50,773~~ 65,648	~~\$10,003~~ 13,002	~~\$19,171~~ 25,198	~~\$7,209~~ 9,304	\$0	~~\$36,384~~ 47,503
Residential Energy Efficiency	PY22	0.655	~~0.71~~ 0.70	~~\$9,192~~ 8,270	~~\$35,128~~ 28,323	\$6,647	~~\$50,968~~ 43,240	~~\$9,774~~ 8,256	~~\$19,023~~ 15,929	~~\$7,383~~ 6,230	\$0	~~\$36,180~~ 30,415
Residential Energy Efficiency Total		0.655		\$43,248	~~\$162,619~~ 164,865	\$33,245	~~\$239,112~~ 241,358	~~\$50,336~~ 50,236	~~\$99,797~~ 99,397	~~\$35,153~~ 35,181	\$0	~~\$185,285~~ 184,814
Residential Home Energy Reports	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622
Residential Home Energy Reports	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692
Residential Home Energy Reports	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631
Residential Home Energy Reports	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801
Residential Home Energy Reports	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116
Residential Home Energy Reports Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862
Low-Income Energy Efficiency	PY18	1.000	~~1.37~~ 1.35	~~\$7,850~~ 7,981	~~\$3,176~~ 1,874	\$3,020	~~\$14,047~~ 12,875	~~\$3,467~~ 3,273	~~\$13,312~~ 12,094	~~\$2,477~~ 1,980	\$0	~~\$19,257~~ 17,347
Low-Income Energy Efficiency	PY19	1.000	~~1.37~~ 1.35	~~\$7,995~~ 8,152	~~\$3,174~~ 1,837	\$3,033	~~\$14,202~~ 13,022	~~\$3,292~~ 3,112	~~\$13,638~~ 12,395	~~\$2,530~~ 2,022	\$0	~~\$19,460~~ 17,529
Low-Income Energy Efficiency	PY20	1.000	~~1.36~~ 1.33	~~\$8,334~~ 8,493	~~\$3,124~~ 1,769	\$3,060	~~\$14,519~~ 13,322	~~\$3,301~~ 3,124	~~\$13,777~~ 12,531	~~\$2,612~~ 2,090	\$0	~~\$19,691~~ 17,745
Low-Income Energy	PY21	1.000	~~1.31~~ 1.29	~~\$8,667~~ 8,691	~~\$3,080~~ 1,728	\$3,087	~~\$14,834~~ 13,502	~~\$3,254~~ 3,056	~~\$13,550~~ 12,112	~~\$2,699~~ 2,141	\$0	~~\$19,503~~ 17,382

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Efficiency							<u>6</u>		<u>84</u>			<u>1</u>
Low-Income Energy Efficiency	PY22	1.000	<u>1.271.23</u>	<u>\$7,1946,722</u>	<u>\$3,2612,140</u>	\$2,966	<u>\$13,42411,828</u>	<u>\$2,7482,508</u>	<u>\$11,78710,091</u>	<u>\$2,5481,952</u>	\$0	<u>\$17,08314,551</u>
Low-Income Energy Efficiency Total		1.000		\$40,040	<u>\$15,8169,347</u>	\$15,167	<u>\$71,02364,554</u>	<u>\$16,06315,072</u>	<u>\$66,06459,294</u>	<u>\$12,86710,186</u>	\$0	<u>\$94,99484,552</u>
Low-Income Home Energy Reports	PY18	1.000	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
Low-Income Home Energy Reports	PY19	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
Low-Income Home Energy Reports	PY20	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
Low-Income Home Energy Reports	PY21	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
Low-Income Home Energy Reports	PY22	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	0.684	<u>1.481.42</u>	<u>\$21,10521,103</u>	<u>\$47,00547,008</u>	\$13,076	\$81,187	\$35,664	\$79,815	\$25	<u>\$4,8382</u>	<u>\$120,342115,506</u>
Non-Residential Energy Efficiency	PY19	0.684	<u>1.501.40</u>	<u>\$26,96827,572</u>	<u>\$60,87865,505</u>	\$14,936	<u>\$102,782108,013</u>	<u>\$44,04545,059</u>	<u>\$104,396106,363</u>	<u>\$7175</u>	<u>\$5,8492</u>	<u>\$154,360151,499</u>
Non-Residential Energy Efficiency	PY20	0.684	<u>1.341.28</u>	<u>\$29,95929,808</u>	<u>\$78,81980,347</u>	\$17,236	<u>\$126,013127,392</u>	<u>\$48,68149,240</u>	<u>\$114,159113,423</u>	<u>\$118122</u>	<u>\$6,3882</u>	<u>\$169,346162,787</u>
Non-Residential Energy Efficiency	PY21	0.684	<u>1.401.35</u>	<u>\$33,20533,050</u>	<u>\$64,11264,551</u>	\$17,799	<u>\$115,116115,400</u>	<u>\$46,76647,295</u>	<u>\$108,428107,963</u>	<u>\$3842</u>	<u>\$5,6802</u>	<u>\$160,912155,301</u>
Non-Residential Energy Efficiency	PY22	0.684	<u>1.481.45</u>	<u>\$24,11223,840</u>	<u>\$46,58244,998</u>	\$15,502	<u>\$86,19684,340</u>	<u>\$37,41837,587</u>	<u>\$85,60484,996</u>	<u>\$5255</u>	<u>\$4,8382</u>	<u>\$127,911122,640</u>
Non-Residential Energy Efficiency Total		0.684		<u>\$135,349135,374</u>	<u>\$297,396302,408</u>	\$78,549	<u>\$511,294516,332</u>	<u>\$212,575214,845</u>	<u>\$492,401492,561</u>	<u>\$303318</u>	<u>\$27,5929</u>	<u>\$732,872707,733</u>
Total		0.73		<u>\$218,637218,663</u>	<u>\$476,831476,620</u>	\$141,473	<u>\$836,941836,756</u>	<u>\$302,430303,609</u>	<u>\$701,337694,326</u>	<u>\$48,32345,685</u>	<u>\$27,5929</u>	<u>\$1,079,6821,043,630</u>

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7.4 Tariffs and Section 1307 Cost Recovery Mechanism for Phase V Plan

As part of the implementation of PECO's Phase V EE&C Plan, PECO proposes to use a cost recovery mechanism similar to the one it used to recover the cost of its Phase IV Plan. See PECO Statement No. 4, Exhibit MAM-1, for a copy of the proposed supplement to PECO's Electric Service Tariff that contains the tariff provisions designed to implement the cost recovery mechanism for PECO's proposed Phase V EE&C Plan.

A high-level summary description of the Phase V cost recovery mechanism was provided in Section 1.9. Additional details on the Phase V cost recovery mechanism, calculations of the charge, and supporting cost documentation are provided in this section.

7.4.1 Cost Recovery Mechanism

PECO proposes to recover the cost of its Phase V EE&C Plan through an Energy Efficiency & Conservation Program Charge (EEPC) similar to the one used in Phase IV. The Phase IV EEPC was designed to comply with Section 1307 of the Public Utility Code and, as the Commission required, was reconcilable and non-bypassable. As required by the Commission in PECO's previous EE&C final implementation orders, the EEPC was not to be a separate line item on residential customers' bills and not included in the price to compare. Instead, residential customers' distribution rates were adjusted by the amount of the EEPC charge calculated for each rate class. For SCI customers, the EEPC was based on energy use or kWh. For large commercial customers, the charge was based on a PJM Peak Load Contribution (PLC). The EEPC was listed as a separate item on SCI and LCI customers' bills and was not included in the price to compare. For the Phase V EE&C Plan, PECO proposes to follow the same format as used in Phase IV.

The cost recovery mechanism for Phase V is shown in the proposed supplement to PECO's Electric Service Tariff submitted as PECO Exhibit MAM-1. The tariff language describes the cost recovery method, the formula for calculating the charge, and the charges specific to each rate class.

The Phase V EEPC will recover all of the fixed capital costs (depreciation and pre-tax return) and operating expenses, not otherwise recovered in base rates, to design and implement the EE&C programs incorporated in its Phase V EE&C Plan. These costs include, among others, the cost of information technology (IT) needed to design and implement the EE&C programs; the costs of customer outreach and program promotion; incremental labor costs incurred to manage and administer the EE&C programs on an ongoing basis; the cost to measure and verify EE&C program results; and the cost of incentives offered to customers to participate in the approved EE&C programs. PECO Exhibit MAM-2 contains a summary of the projected expenditures for each of the programs across these rate classes.

In accordance with the Phase V Final Order, PECO is required to establish a cost recovery methodology for Phase V that is designed to recover, on an annual basis, projected program costs that it anticipates will be incurred over each surcharge application year. In addition, PECO is required to reconcile actual expenses incurred with actual revenues received for the reconciliation period. For PY18 (2026/27), the cost recovery rates are being calculated based

on the projected total program expenditures allocated to each rate class for that program year plus the reconciliation amount for PY17 (2025/26) and any costs remaining from previous periods. To develop the recovery charge for each rate class for PY18 (2026/27), the total expenditure for that class was divided by the appropriate projected class billing units for the period from June 1, 2026, through May 31, 2027. Subsequently, PECO will develop Phase V recovery rates annually based on the projected program expenditures for that program year plus reconciliation amounts for previous periods. The charge that was calculated per billing unit for each rate class was grossed up to provide for recovery of Pennsylvania Gross Receipts Tax. This calculation produces a charge that, net of Pennsylvania Gross Receipts Tax, will recover the projected total expenditures over the recovery period.

The Phase V Final Order also requires PECO to remove the SWE costs from the EE&C Phase V budget in the same manner as was done in Phase IV. PECO will, therefore, track the Phase V SWE costs separately from its EE&C costs but will still recover such costs through its Phase V EEPC.

The Phase V SWE costs will be determined through an RFP bidding process. Until the final SWE costs are known, PECO has included an estimate. PECO Exhibit MAM-3 contains the detailed calculations for the development of the EEPC charges for each class as well as the SWE costs, which are reflected as a separate line item.

7.5.2 True-Up

As noted earlier, PECO's Phase V EEPC will be reconciled on an annual basis to account for any under- or over-recovery from the prior year. As the Phase V Final Order specifies, PECO will reconcile its total actual recoverable EE&C Plan expenditures incurred through March 31, 2026, with its actual EE&C Plan revenues received through March 31, 2026. The net over- or under-recovery shall be reflected (without interest) as a separate line item of the E factor calculation of the Phase V rates to become effective June 1, 2026. These rates will also include, as a separate line item, PECO's projection of its expenses related to Phase IV program implementation incurred in April and May 2026, including projected expenses to finalize any measures installed and commercially operable on or before May 31, 2026; projected expenses to finalize any contracts; and other Phase IV administrative obligations. The difference between PECO's projected and actual expenses and EEPC revenue for the months of April and May 2026 will be presented as clearly identified, separate line items in the reconciliation statement for the period April 1, 2026, through March 31, 2027.

7.5 Ensuring Recovery Alignment with Benefitting Customer Classes

PECO's cost recovery mechanism for its EE&C Plan is designed to ensure that measures are paid for by the same customer class(es) that receive the associated measures' EE&C benefits. This is accomplished by creating separate EE&C charges for the residential class, SCI class, LCI class, and Municipal Lighting class.²⁸³⁶ Incentives and program costs are tracked independently for each class to maintain transparency and accurate allocation. Project

²⁸³⁶ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

management and data systems monitor cost flows and compliance, integrating with CSP reporting for oversight.

See PECO Exhibits MAM-2 and MAM-3, which list the program costs by rate class and for the spreadsheet that shows how the EEPC was developed for each customer class according to the method just described. PECO proposes to start the recovery period for Phase V with bills sent to customers during July 2026 (June usage) and will continue through bills sent to customers in June 2031 (May usage).

7.6 Accounting for Phase V Costs versus Prior Phase Costs

In accordance with the Phase V Filing Template provided with the Commission's Secretarial Letter dated September 8, 2025, at Docket No. M-2025-3052826, PECO must provide a description of how it will account for Phase V costs separately from costs incurred in prior phases.²⁹³⁷ To satisfy this requirement, PECO will do the following:

- Account for the Phase V costs and revenues on its books separately from prior phases by setting up new general ledger accounts for Phase V costs and revenues so that there will be no comingling of prior phase costs and Phase V costs or funds in PECO's accounting records.
- Clearly and separately identify and track prior phase costs and revenues in the EEPC cost recovery and reconciliation mechanism so that Phase V costs will be reconciled against the Phase V funds collected. See the description of the cost recovery mechanism in the proposed supplement to PECO's Electric Service Tariff provided as PECO Exhibit MAM-1.

²⁹³⁷ EE&C Phase V Filing Template Secretarial Letter, issued September 8, 2025.

8. Cost-Effectiveness

This section provides an overview of the cost-effectiveness framework for Phase V. Section 8.1 details avoided costs. Section 8.2 confirms the values used for the real discount rate and nominal discount rate. Section 8.3 discusses the cost-effectiveness analysis approach. Section 8.3 provides cost-effectiveness information for Phase V, including supporting data tables.

8.1 Avoided Costs

The following sections report on the avoided capacity and energy costs that were used to conduct the cost-effectiveness analysis. PECO developed data inputs to support the avoided cost analysis based on direction from the PUC in the TRC Order.

PECO used the SWE's Avoided Cost Calculator to develop avoided cost inputs as directed in the PUC TRC Order. The final PECO Avoided Cost Calculator is included in Appendix E.

8.2 Confirm Use of 3% Real Discount Rate and 5% Nominal Discount Rate

PECO used a real discount of 3% for cost test modeling as directed in the PUC TRC Order.

8.3 Cost-Effectiveness Analysis Approach

The cost-effectiveness results in this Plan follow PUC specifications outlined in the 2026 TRC Order issued November 7, 2024. PECO calculates the TRC test at the measure, program, and portfolio levels. Key elements of the TRC Order include:

- Measure life capped at 15 years
- Use of gross and net energy and demand savings for benefit-cost purposes
- Inclusion of quantifiable savings in fossil fuels, water consumption, and operations and maintenance (O&M) benefits

At the measure level, the TRC test compares lifetime benefits—calculated by multiplying annual savings by avoided costs for each year and discounting to present value—with lifetime costs, including incremental capital, installation, and O&M. Program-level TRC adds CSP and PECO delivery costs, while portfolio-level TRC includes all program costs plus portfolio-wide common costs. A ratio of benefits to costs ≥ 1 indicates cost-effectiveness.

PECO also screens the proposed measure mix economically using the TRC test. Although not all measures must pass individually, the overall portfolio must meet cost-effectiveness requirements. This approach supports a comprehensive mix of energy and demand savings measures for all customers while maintaining compliance.

8.4 Data Tables

Table 44 and Table 45 contains data tables as required by the PUC EE&C Plan template.

Table 44. TRC Benefits (Gross)

/Subprogram		GrossNet		BenefitsBe		nefits ⁵							
am													
Residential Energy Efficiency	PY18	~~1.0~~ 0	~~0.93~~ 0.91	~~\$8,089~~ \$8,089	~~7,06~~ 7,06	~~\$47,656~~ \$47,656	~~37,4~~ 37,4	\$6,649	~~\$62,393~~ \$62,393	~~51,1~~ 51,1	~~\$15,882~~ \$15,882	~~\$31,653~~ \$31,653	~~\$10,180~~ \$10,180
				0		12			21		910	446	86
Residential Energy Efficiency	PY19	~~1.0~~ 0	0.91	~~\$8,366~~ \$8,366	~~7,95~~ 7,95	~~\$48,063~~ \$48,063	~~43,9~~ 43,9	\$6,649	~~\$63,078~~ \$63,078	~~58,5~~ 58,5	~~\$15,383~~ \$15,383	~~\$31,552~~ \$31,552	~~\$10,422~~ \$10,422
				2		40			41		229	101	98
Residential Energy Efficiency	PY20	~~1.0~~ 0	0.77	~~\$8,671~~ \$8,671	~~19,30~~ 19,30	~~\$58,374~~ \$58,374	~~66,0~~ 66,0	\$6,650	~~\$73,695~~ \$73,695	~~82,0~~ 82,0	~~\$15,376~~ \$15,376	~~\$30,815~~ \$30,815	~~\$10,777~~ \$10,777
				0		73			23		089	389	903
Residential Energy Efficiency	PY21	~~1.0~~ 0	0.75	~~\$8,929~~ \$8,929	~~10,6~~ 10,6	~~\$58,413~~ \$58,413	~~79,3~~ 79,3	\$6,650	~~\$73,992~~ \$73,992	~~96,6~~ 96,6	~~\$15,267~~ \$15,267	~~\$29,260~~ \$29,260	~~\$11,003~~ \$11,003
				67		78			95		844	458	200
Residential Energy Efficiency	PY22	~~1.0~~ 0	0.74	~~\$9,192~~ \$9,192	~~8,27~~ 8,27	~~\$58,452~~ \$58,452	~~47,5~~ 47,5	\$6,647	~~\$74,292~~ \$74,292	~~62,4~~ 62,4	~~\$14,917~~ \$14,917	~~\$29,034~~ \$29,034	~~\$11,269~~ \$11,269
				0		80			98		601	312	08
Residential Energy Efficiency Total		<u>1.00</u>	<u>0.80</u>	\$43,248		~~\$270,957~~ \$270,957	~~274~~ 274	\$33,245	~~\$347,450~~ \$347,450	~~350~~ 350	~~\$76,825~~ \$76,825	~~\$152,315~~ \$152,315	~~\$53,652~~ \$53,652
						,384			,877		672	51,705	695
Residential Home Energy Reports	PY18	~~1.0~~ 0	4.96	\$0		\$0		\$2,342	\$2,342		\$3,400	\$8,222	\$0
Residential Home Energy Reports	PY19	~~1.0~~ 0	5.14	\$0		\$0		\$3,639	\$3,639		\$7,135	\$11,557	\$0
Residential Home Energy Reports	PY20	~~1.0~~ 0	4.80	\$0		\$0		\$2,634	\$2,634		\$5,028	\$7,602	\$0
Residential Home Energy Reports	PY21	~~1.0~~ 0	3.88	\$0		\$0		\$2,783	\$2,783		\$4,006	\$6,795	\$0
Residential Home Energy Reports	PY22	~~1.0~~ 0	3.52	\$0		\$0		\$2,590	\$2,590		\$3,115	\$6,000	\$0
Residential Home		<u>1.00</u>	<u>4.49</u>	\$0		\$0		\$13,989	\$13,989		\$22,684	\$40,177	\$0
													\$62,862

Total												
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency	PY18	~~1.0~~ <u>1.0</u> 0	~~1.37~~ <u>1.35</u>	~~\$7,850~~ <u>\$7,981</u>	~~\$3,176~~ <u>\$1,874</u>	\$3,020	~~\$14,047~~ <u>\$12,875</u>	~~\$3,467~~ <u>\$3,273</u>	~~\$13,312~~ <u>\$12,094</u>	~~\$2,477~~ <u>\$1,980</u>	\$0	~~\$19,257~~ <u>\$17,347</u>
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency	PY19	~~1.0~~ <u>1.0</u> 0	~~1.37~~ <u>1.35</u>	~~\$7,995~~ <u>\$8,152</u>	~~\$3,174~~ <u>\$1,837</u>	\$3,033	~~\$14,202~~ <u>\$13,022</u>	~~\$3,292~~ <u>\$3,112</u>	~~\$13,638~~ <u>\$12,395</u>	~~\$2,530~~ <u>\$2,022</u>	\$0	~~\$19,460~~ <u>\$17,529</u>
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency	PY20	~~1.0~~ <u>1.0</u> 0	~~1.36~~ <u>1.33</u>	~~\$8,334~~ <u>\$8,493</u>	~~\$3,124~~ <u>\$1,769</u>	\$3,060	~~\$14,519~~ <u>\$13,322</u>	~~\$3,301~~ <u>\$3,124</u>	~~\$13,777~~ <u>\$12,531</u>	~~\$2,612~~ <u>\$2,090</u>	\$0	~~\$19,691~~ <u>\$17,745</u>
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency	PY21	~~1.0~~ <u>1.0</u> 0	~~1.31~~ <u>1.29</u>	~~\$8,667~~ <u>\$8,691</u>	~~\$3,080~~ <u>\$1,728</u>	\$3,087	~~\$14,834~~ <u>\$13,506</u>	~~\$3,254~~ <u>\$3,056</u>	~~\$13,550~~ <u>\$12,184</u>	~~\$2,699~~ <u>\$2,141</u>	\$0	~~\$19,503~~ <u>\$17,381</u>
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency	PY22	~~1.0~~ <u>1.0</u> 0	~~1.27~~ <u>1.23</u>	~~\$7,194~~ <u>\$6,722</u>	~~\$3,261~~ <u>\$2,140</u>	\$2,966	~~\$13,421~~ <u>\$11,828</u>	~~\$2,748~~ <u>\$2,508</u>	~~\$11,787~~ <u>\$10,091</u>	~~\$2,548~~ <u>\$1,952</u>	\$0	~~\$17,083~~ <u>\$14,551</u>
~~Low-Income~~ <u>Low-Income</u> Energy Efficiency Total		~~1.0~~ <u>1.0</u> 0	~~1.31~~ <u>1.31</u>	\$40,040	~~\$15,816~~ <u>\$9,347</u>	\$15,167	~~\$71,023~~ <u>\$64,554</u>	~~\$16,063~~ <u>\$15,072</u>	~~\$66,064~~ <u>\$59,294</u>	~~\$12,867~~ <u>\$10,186</u>	\$0	~~\$94,994~~ <u>\$84,552</u>
~~Low-Income~~ <u>Low-Income</u> Home Energy Reports	PY18	~~1.0~~ <u>1.0</u> 0	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
~~Low-Income~~ <u>Low-Income</u> Home Energy Reports	PY19	~~1.0~~ <u>1.0</u> 0	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
~~Low-Income~~ <u>Low-Income</u> Home Energy Reports	PY20	~~1.0~~ <u>1.0</u> 0	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
~~Low-Income~~ <u>Low-Income</u> Home Energy Reports	PY21	~~1.0~~ <u>1.0</u> 0	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536

~~Income~~ Low-Inco		<u>0</u>										
me Home Energy Reports												
~~Low-Income~~ Low-Inco	PY22	~~1.0~~ <u>1.0</u>	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
me Home Energy Reports		<u>0</u>										
~~Low-Income~~ Low-Inco		<u>1.00</u>		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
me Home Energy Reports Total												
Non-Residential Energy Efficiency	PY18	~~1.0~~ <u>1.0</u>	~~1.56~~ <u>1.50</u>	\$21,105	\$21,105	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$7,072	\$175,913
		<u>0</u>		<u>103</u>	<u>59</u>						<u>2</u>	<u>844</u>
Non-Residential Energy Efficiency	PY19	~~1.0~~ <u>1.0</u>	~~1.57~~ <u>1.47</u>	\$26,968	\$26,968	\$14,936	\$143,347	\$64,384	\$152,603	\$104	\$8,550	\$225,640
		<u>0</u>		<u>572</u>	<u>108</u>		<u>993</u>	<u>867</u>	<u>55,479</u>	<u>109</u>	<u>3</u>	<u>458</u>
Non-Residential Energy Efficiency	PY20	~~1.0~~ <u>1.0</u>	~~1.40~~ <u>1.33</u>	\$29,959	\$29,959	\$17,236	\$176,244	\$71,164	\$166,875	\$172	\$9,338	\$247,546
		<u>0</u>		<u>808</u>	<u>131</u>		<u>259</u>	<u>977</u>	<u>65,799</u>	<u>178</u>	<u>3</u>	<u>957</u>
Non-Residential Energy Efficiency	PY21	~~1.0~~ <u>1.0</u>	~~1.47~~ <u>1.41</u>	\$33,205	\$33,205	\$17,799	\$160,055	\$68,362	\$158,497	\$56	\$8,303	\$235,217
		<u>0</u>		<u>050</u>	<u>109</u>		<u>470</u>	<u>134</u>	<u>57,817</u>	<u>61</u>	<u>3</u>	<u>015</u>
Non-Residential Energy Efficiency	PY22	~~1.0~~ <u>1.0</u>	~~1.57~~ <u>1.54</u>	\$24,112	\$24,112	\$15,502	\$118,840	\$54,697	\$125,133	\$75	\$7,072	\$186,977
		<u>0</u>		<u>840</u>	<u>76.7</u>		<u>127</u>	<u>944</u>	<u>24,246</u>	<u>80</u>	<u>2</u>	<u>272</u>
Non-Residential Energy Efficiency Total		<u>1.00</u>		\$135,349	\$135,349	\$78,549	\$711,124	\$310,737	\$719,780	\$443	\$40,33	\$1,071,293
				<u>35,374</u>	<u>504</u>		<u>488</u>	<u>14,055</u>	<u>20,013</u>	<u>465</u>	<u>314</u>	<u>034,546</u>
Total		~~1.0~~ <u>1.0</u>		\$218,637	\$218,637	\$141,473	\$1,144,110	\$427,081	\$981,233	\$66,962	\$40,33	\$1,515,610
		<u>0</u>		<u>18,663</u>	<u>788</u>		<u>148,432</u>	<u>29,255</u>	<u>74,087</u>	<u>346</u>	<u>314</u>	<u>467,702</u>

Table 45. TRC Benefits (Net)

Residential Energy Efficiency	PY18	0.655	~~0.85~~ <u>0.86</u>	~~\$8,247~~ <u>\$7,060</u>	~~\$28,288~~ <u>\$22,078</u>	~~\$6,491~~ <u>\$6,649</u>	~~\$43,026~~ <u>\$35,787</u>	~~\$10,520~~ <u>\$8,459</u>	~~\$19,629~~ <u>\$16,672</u>	~~\$6,581~~ <u>\$5,495</u>	\$0	~~\$36,730~~ <u>\$30,626</u>
Residential Energy Efficiency	PY19	0.655	~~0.83~~ <u>0.85</u>	~~\$8,524~~ <u>\$7,952</u>	~~\$28,459~~ <u>\$26,048</u>	~~\$6,491~~ <u>\$6,649</u>	~~\$43,474~~ <u>\$40,649</u>	~~\$10,221~~ <u>\$9,323</u>	~~\$19,279~~ <u>\$19,067</u>	~~\$6,748~~ <u>\$6,354</u>	\$0	~~\$36,248~~ <u>\$34,743</u>
Residential Energy Efficiency	PY20	0.655	~~0.71~~ <u>0.74</u>	~~\$8,830~~ <u>\$9,300</u>	~~\$35,110~~ <u>\$40,085</u>	~~\$6,491~~ <u>\$6,650</u>	~~\$50,430~~ <u>\$56,034</u>	~~\$10,249~~ <u>\$11,196</u>	~~\$18,458~~ <u>\$22,532</u>	~~\$6,989~~ <u>\$7,799</u>	\$0	~~\$35,696~~ <u>\$41,527</u>
Residential Energy Efficiency	PY21	0.655	~~0.68~~ <u>0.72</u>	~~\$9,088~~ <u>\$10,667</u>	~~\$35,046~~ <u>\$48,331</u>	~~\$6,491~~ <u>\$6,650</u>	~~\$50,626~~ <u>\$65,648</u>	~~\$10,213~~ <u>\$13,002</u>	~~\$17,107~~ <u>\$25,198</u>	~~\$7,149~~ <u>\$9,304</u>	\$0	~~\$34,469~~ <u>\$47,503</u>
Residential Energy Efficiency	PY22	0.655	~~0.69~~ <u>0.70</u>	~~\$9,349~~ <u>\$8,270</u>	~~\$34,981~~ <u>\$28,323</u>	~~\$6,491~~ <u>\$6,647</u>	~~\$50,821~~ <u>\$43,240</u>	~~\$10,022~~ <u>\$8,256</u>	~~\$17,886~~ <u>\$15,929</u>	~~\$7,335~~ <u>\$6,230</u>	\$0	~~\$35,243~~ <u>\$30,415</u>
Residential Energy Efficiency Total		0.655		~~\$44,038~~ <u>\$43,248</u>	~~\$161,884~~ <u>\$164,865</u>	~~\$32,456~~ <u>\$33,245</u>	~~\$238,377~~ <u>\$241,358</u>	~~\$51,225~~ <u>\$50,236</u>	~~\$92,360~~ <u>\$99,397</u>	~~\$34,801~~ <u>\$35,181</u>	\$0	~~\$178,386~~ <u>\$184,814</u>
Residential Home Energy Reports	PY18	1.000	~~4.95~~ <u>4.96</u>	\$0	\$0	~~\$2,267~~ <u>\$2,342</u>	~~\$2,267~~ <u>\$2,342</u>	~~\$3,402~~ <u>\$3,400</u>	~~\$7,820~~ <u>\$8,222</u>	\$0	\$0	~~\$11,223~~ <u>\$11,622</u>
Residential Home Energy Reports	PY19	1.000	~~5.80~~ <u>5.14</u>	\$0	\$0	~~\$3,061~~ <u>\$3,639</u>	~~\$3,061~~ <u>\$3,639</u>	~~\$7,148~~ <u>\$7,135</u>	~~\$10,613~~ <u>\$11,557</u>	\$0	\$0	~~\$17,761~~ <u>\$18,692</u>
Residential Home Energy Reports	PY20	1.000	~~3.82~~ <u>4.80</u>	\$0	\$0	~~\$3,061~~ <u>\$2,634</u>	~~\$3,061~~ <u>\$2,634</u>	~~\$5,046~~ <u>\$5,028</u>	~~\$6,637~~ <u>\$7,602</u>	\$0	\$0	~~\$11,683~~ <u>\$12,631</u>
Residential Home Energy Reports	PY21	1.000	~~3.11~~ <u>3.88</u>	\$0	\$0	~~\$3,061~~ <u>\$2,783</u>	~~\$3,061~~ <u>\$2,783</u>	~~\$4,032~~ <u>\$4,006</u>	~~\$5,476~~ <u>\$6,795</u>	\$0	\$0	~~\$9,508~~ <u>\$10,801</u>
Residential Home Energy Reports	PY22	1.000	~~2.84~~ <u>3.52</u>	\$0	\$0	~~\$3,061~~ <u>\$2,590</u>	~~\$3,061~~ <u>\$2,590</u>	~~\$3,148~~ <u>\$3,115</u>	~~\$5,540~~ <u>\$6,000</u>	\$0	\$0	~~\$8,688~~ <u>\$9,116</u>
Residential Home Energy Reports Total		1.000		\$0	\$0	~~\$14,513~~ <u>\$13,989</u>	~~\$14,513~~ <u>\$13,989</u>	~~\$22,776~~ <u>\$22,684</u>	~~\$36,087~~ <u>\$40,177</u>	\$0	\$0	~~\$58,863~~ <u>\$62,862</u>
Low-Income Energy Efficiency	PY18	1.000	~~1.52~~ <u>1.35</u>	~~\$8,372~~ <u>\$7,981</u>	~~\$2,655~~ <u>\$1,874</u>	~~\$2,499~~ <u>\$3,020</u>	~~\$13,525~~ <u>\$12,875</u>	~~\$3,494~~ <u>\$3,273</u>	~~\$14,642~~ <u>\$12,094</u>	~~\$2,456~~ <u>\$1,980</u>	\$0	~~\$20,592~~ <u>\$17,347</u>
Low-Income Energy Efficiency	PY19	1.000	~~1.52~~ <u>1.35</u>	~~\$8,529~~ <u>\$8,152</u>	~~\$2,640~~ <u>\$1,837</u>	~~\$2,499~~ <u>\$3,033</u>	~~\$13,668~~ <u>\$13,022</u>	~~\$3,327~~ <u>\$3,112</u>	~~\$14,939~~ <u>\$12,395</u>	~~\$2,511~~ <u>\$2,022</u>	\$0	~~\$20,776~~ <u>\$17,529</u>
Low-Income Energy Efficiency	PY20	1.000	~~1.49~~ <u>1.33</u>	~~\$8,896~~ <u>\$8,493</u>	~~\$2,563~~ <u>\$1,769</u>	~~\$2,499~~ <u>\$3,060</u>	~~\$13,957~~ <u>\$13,322</u>	~~\$3,345~~ <u>\$3,124</u>	~~\$14,875~~ <u>\$12,531</u>	~~\$2,594~~ <u>\$2,090</u>	\$0	~~\$20,815~~ <u>\$17,745</u>

Low-Income Energy Efficiency	PY21	1.000	~~1.441.29~~	~~\$9,2568,691~~	~~\$2,4921,728~~	~~\$2,4993,087~~	~~\$14,24613,506~~	~~\$3,3093,056~~	~~\$14,52312,184~~	~~\$2,6832,141~~	\$0	~~\$20,51617,381~~
Low-Income Energy Efficiency	PY22	1.000	~~1.421.23~~	~~\$7,6626,722~~	~~\$2,7932,140~~	~~\$2,4992,966~~	~~\$12,95311,828~~	~~\$2,8082,508~~	~~\$13,01510,091~~	~~\$2,5371,952~~	\$0	~~\$18,36014,551~~
Low-Income Energy Efficiency Total		1.000		~~\$42,71440,040~~	~~\$13,1429,347~~	~~\$12,49315,167~~	~~\$68,34964,554~~	~~\$16,28415,072~~	~~\$71,99459,294~~	~~\$12,78110,186~~	\$0	~~\$101,05884,552~~
Low-Income Home Energy Reports	PY18	1.000	~~18.317.78~~	\$0	\$0	~~\$72172~~	~~\$72172~~	\$299	~~\$1,0111,041~~	\$0	\$0	~~\$1,3101,340~~
Low-Income Home Energy Reports	PY19	1.000	~~8.047.18~~	\$0	\$0	~~\$7891~~	~~\$7891~~	\$139	~~\$489512~~	\$0	\$0	~~\$628651~~
Low-Income Home Energy Reports	PY20	1.000	~~7.856.80~~	\$0	\$0	~~\$7895~~	~~\$7895~~	~~\$131130~~	~~\$482517~~	\$0	\$0	~~\$613648~~
Low-Income Home Energy Reports	PY21	1.000	~~6.356.31~~	\$0	\$0	~~\$7885~~	~~\$7885~~	~~\$110109~~	~~\$387427~~	\$0	\$0	~~\$496536~~
Low-Income Home Energy Reports	PY22	1.000	~~6.156.12~~	\$0	\$0	~~\$7881~~	~~\$7881~~	~~\$9594~~	~~\$385400~~	\$0	\$0	~~\$480494~~
Low-Income Home Energy Reports Total		1.000		\$0	\$0	~~\$384524~~	~~\$384524~~	~~\$774772~~	~~\$2,7542,897~~	\$0	\$0	~~\$3,5283,669~~
Non-Residential Energy Efficiency	PY18	0.684	~~1.441.42~~	~~\$21,10521,103~~	~~\$47,00547,008~~	\$13,076	\$81,187	~~\$36,12735,664~~	~~\$75,76879,815~~	\$25	~~\$4,8382~~	~~\$116,757115,506~~
Non-Residential Energy Efficiency	PY19	0.684	~~1.451.40~~	~~\$26,96827,572~~	~~\$60,87865,505~~	\$14,936	~~\$102,782108,013~~	~~\$44,76245,059~~	~~\$97,937106,363~~	~~\$7075~~	~~\$5,8492~~	~~\$148,618151,499~~
Non-Residential Energy Efficiency	PY20	0.684	1.28	~~\$29,95929,808~~	~~\$78,81980,347~~	\$17,236	~~\$126,013127,392~~	~~\$49,63949,240~~	~~\$105,590113,423~~	~~\$117122~~	~~\$6,3882~~	~~\$161,734162,787~~
Non-Residential Energy Efficiency	PY21	0.684	~~1.311.35~~	~~\$33,20533,050~~	~~\$64,11264,551~~	\$17,799	~~\$115,116115,400~~	~~\$47,81747,295~~	~~\$97,719107,963~~	~~\$3842~~	~~\$5,6802~~	~~\$151,254155,301~~
Non-Residential Energy Efficiency	PY22	0.684	~~1.441.45~~	~~\$24,11223,840~~	~~\$46,58244,998~~	\$15,502	~~\$86,19684,340~~	~~\$38,46137,587~~	~~\$80,96684,996~~	~~\$5155~~	~~\$4,8382~~	~~\$124,316122,640~~
Non-Residential Energy Efficiency Total		0.684		~~\$135,349135,374~~	~~\$297,396302,408~~	\$78,549	~~\$511,294516,332~~	~~\$216,806214,845~~	~~\$457,980492,561~~	~~\$301318~~	~~\$27,5929~~	~~\$702,679707,733~~
Total		0.73		~~\$222,100218,663~~	~~\$472,422476,620~~	~~\$138,394141,473~~	~~\$832,917836,756~~	~~\$307,866303,609~~	~~\$661,175694,326~~	~~\$47,88245,685~~	~~\$27,5929~~	~~\$1,044,5151,043,630~~

9. Plan Compliance Information and Other Key Issues

This section contains additional required compliance items and addresses key issues in EE&C Plan, portfolio, and program design. Section 9.1 includes how PECO will comply with Plan requirements, including low-income requirements, spending on pilots, and the midstream delivery documentation process. Section 9.2 discusses other key issues such as long-term sustainability impacts, how customer education will be carried out, and how public reporting of Act 129 activities will be handled.

9.1 Plan Compliance Considerations

9.1.1 Description of Plan

As Section 3 of this document details, PECO's EE&C Plan provides energy efficiency programs to each of its customer classes, including two specific programs for low-income households.³⁰³⁸ PECO's programs are equitably provided across its customer classes consistent with the Phase V Final Order.

9.1.2 Statement Delineating the EE&C Plan

PECO's Plan (~~Section 1~~), is projected to achieve ~~at least 1,111,685 MWh and 194.8 MW~~the savings detailed in Section 1 by the end of Phase V. The EE&C Plan is projected to achieve Phase V's energy and demand savings requirements through a broad array of financial incentives. These incentives will be provided to PECO's customers through CSPs, installation companies, and trade allies (e.g., HVAC contractors and retail stores).

9.1.3 Low-Income Requirements

PECO's EE&C Plan will meet the low-income requirements by building on its low-income programs in Phase IV. The Phase V Final Order highlights the importance of collaboration between LIURP and Act 129 for all utilities. The CSP for the Residential program will continue its existing partnerships with the LIURP, Philadelphia Gas Works, and Philadelphia Water Department. To meet the required demand reduction targets, PECO envisions a much higher participation level of electrically heated homes in Phase V. The Plan includes free energy checkups with no cost install measures and free electric heat assessments with no cost measures. PECO's Plan is designed to exceed the minimum requirement that 74,456 MWh come from the two dedicated low-income subprograms and the low-income portion of multifamily through the Residential program.³⁴³⁹

9.1.4 Spending on Experimental Equipment or Devices Limited to 2% of Funds

PECO confirms that spending on experimental equipment and devices, including pilot projects, will be capped at 2% of the overall budget. As part of this filing, PECO proposes ~~at~~two

³⁰³⁸ Consistent with Act 129, PECO's low-income household definition is households at or below 150% of the Federal poverty income guidelines. See 66 Pa.C.S. 2806.1(b)(1)(i)(B).

³⁴³⁹ See PECO's discussion in Sections 3 and 4 of this document for a detailed description of its EE&C programs and its implementation strategy.

residential pilot ~~program~~ programs, further described below. The Residential CSP will perform both pilots.

Heat Pump Load Shifting Pilot

PECO proposes a residential pilot to test hybrid heat pump load-shifting capabilities. PECO is uniquely positioned as a dual-fuel utility and seeks to leverage natural gas resources within its service territory to achieve PDRs. As PECO's system is primarily summer peaking, the Company recognizes that achieving meaningful winter peak demand reductions presents unique challenges.

This pilot program focuses on customers utilizing hybrid heat pump systems that integrate both electric and gas heating capabilities. The objective is to evaluate the feasibility of time-based control strategies for winter peak daily load shifting. Specifically, the program will transition heating operation from the electric system to the gas system during PECO's peak hours. This approach will provide valuable insights into the operational effectiveness of time-based controls for hybrid systems as a demand-side management tool and inform future strategies for optimizing these resources. Further details on this pilot are provided in Table 46.

Table 46. Hybrid Heat Pump Load Shifting Pilot

Pilot Design	Hybrid heat pump systems present an opportunity to serve as a daily load-shifting resource. During peak demand periods, these systems can be controlled to temporarily disable the electric heat pump and rely solely on the gas furnace for heating.
Hypothesis Being Tested	Are time-based controls for hybrid heat pumps an effective method to reduce electric peak demand reduction during winter peak hours?
Budget	\$1.6 million
Participation Estimates	200 customers ³²⁴⁰
Estimated Savings	600 kW ³³⁴¹ <u>total</u> 3 kW per customer
Estimated Timeline	Fall 2027 – Fall 2028

Low- and Moderate- Income Pilot

PECO proposes a pilot designed to expand access to energy efficiency opportunities for Low- to Moderate- Income (LMI) customers, defined as customers earning between 151% and 250% of the Federal Poverty Level. This segment often faces barriers to participating in traditional energy efficiency programs, despite having significant energy burden and savings potential.

³²⁴⁰ PECO's Residential CSP will source these customers from heating and cooling system data that is available through smart thermostat data in collaboration with manufacturing partners.

³³⁴¹ Value estimated based on a typical heat pump power draw in the winter for a typical system during peak hours.

Table 47. Low- and Moderate-Income Pilot

<u>Pilot Design</u>	<u>Over a pilot term of up to 24 months, PECO will identify, implement, and track comprehensive energy efficiency measures for participating LMI customers while supporting the Company's overall energy savings objectives. In addition to delivering measurable efficiency impacts, the pilot will test and refine incentive designs, marketing approaches, and enrollment processes that improve customer participation and installation of comprehensive measures.</u>
<u>Hypothesis Being Tested</u>	<u>What incentive levels are needed to support participation from LMI customers?</u> <u>What marketing tactics are effective to reach LMI customers?</u> <u>What verification procedures are needed to identify LMI customer eligibility?</u>
<u>Budget</u>	<u>\$1 million</u>
<u>Participation Estimates</u>	<u>Up to 100 customers</u>
<u>Estimated Savings</u>	<u>Up to 300 MWh total</u> <u>Up to 3 MWh per customer</u> <u>Per Unit savings will depend on the treatments installed. Eligible treatments may include, but are not limited to:</u> <u>• Ductless Mini Split Heat Pumps: ~800 kWh/unit</u> <u>• Heat Pump Water Heaters: ~1700 kWh/unit</u> <u>• Building Shell Measures (Duct Sealing and Duct Insulation, Residential Air Sealing): ~200 kWh - 500 kWh/unit</u>
<u>Estimated Timeline</u>	<u>Fall 2027 – Fall 2029</u>

9.1.5 Competitively Neutral to All Electric Distribution Customers

PECO's EE&C program suite will be available to all PECO customers, regardless of whether they receive generation supply from PECO as a default service provider or from an EGS.

To ensure equitable access to program benefits and prudent use of ratepayer funds, PECO may establish maximum incentive limits for individual projects. These limits are designed to prevent any single project from disproportionately utilizing available funding, while maintaining compliance with Act 129 objectives and supporting broad participation across customer classes.

9.1.6 Midstream Delivery Documentation Process

PECO will work with its non-residential CSP to confirm that midstream delivery of lighting minimizes like-for-like LED replacements. Participating distributors will be required to:

- **Confirm at the point of sale** that the replaced equipment is non-LED and certify installation within 90 days, in alignment with current program standards.
- **Provide mandatory baseline documentation** through the midstream upload template, including details such as existing fixture type, to confirm accurate data capture.
- **Undergo compliance verification**, which includes randomized post-installation checks—both phone and onsite—within 90 days of purchase. Sample sizes will be adjusted based on risk factors such as distributor performance or anomalies in transaction data.
- **Follow enhanced QA/QC protocols**, including automated flags for duplicate projects or missing baseline data, and annual compliance audits.
- **Complete mandatory training** on documentation requirements and program rules, reinforced through periodic refreshers and performance reviews.

The midstream platform will track transactions and verification status, providing transparency and reporting to PECO and evaluators. Distributors that fail to meet compliance standards will be subject to corrective action plans or removal from the program. This multi-layered approach to combine front-end controls, back-end verification, and ongoing distributor engagement facilitates midstream lighting incentives that deliver real, attributable savings and supports program integrity.

9.2 Other Key Issues

9.2.1 Describe How This EE&C Plan Will Lead to Long-Term, Sustainable Energy Efficiency Savings in the EDC's Service Territory and in Pennsylvania

PECO's EE&C Plan was developed to meet or exceed the requirements of Act 129 and the Phase V Final Order. In developing the Phase V EE&C Plan, PECO combined its own experience implementing programs in Phases I - IV with lessons learned from utility demand side management programs in other jurisdictions around the country and worked with CSPs to design the programs. The proposed Plan includes a variety of proven programs and components effective across all customer classes. PECO believes that providing programs along with comprehensive education will lead to long-term sustainability through ongoing customer participation.

9.2.2 Describe, by Sector, How the EDC Will Address Customer Education for Its Programs

To educate customers on energy efficiency, PECO will conduct outreach to schools, work with community partners, speak with groups, staff tables at events, and reach diverse communities.

It also will send emails to customers, distribute program materials, and canvas neighborhoods. PECO has strong relationships with numerous community organizations who, through annual sponsorships and other partner-specific programs, help spread the word to their constituents about energy efficiency.

To help educate customers about heat pumps, PECO will include heat pump-specific technology content within its customer newsletter (bill insert) twice a year as part of seasonal readiness communications. Content will include the benefits of heat pump technology and proper maintenance instructions. PECO will provide a post-installation email to customers with instructions on proper temperature settings and an overview of how heat pump technology works with tips regarding minimization of auxiliary heat systems and proper maintenance (sourced by ENERGY STAR).

9.2.3 Describe How the EDC Will Provide the Public with Information about the Results from the Programs

PECO will periodically issue press releases to inform the public of the progress of its EE&C Plan and refer the public to where reports about PECO's Act 129 results are posted on the PUC's website. PECO will only provide information to the public after the SWE completes its review and approves PECO's annual reports.

10. Appendices

Appendix A. CSP Contracts

PECO has bid out all CSP contracts. Each winning CSP resulting in a signed contract will be filed with the PUC as required. No CSP contract will be effective until it is approved by the PUC.

Appendix B. Calculation Methods and Assumptions

Total Resource Cost Test Calculation Methods

Benefit-cost analysis of PECO's portfolio of energy efficiency programs was conducted through the use of a comprehensive benefit-cost screening tool. The tool uses the most recent savings values and inputs from the 2026 TRM. The tool uses inputs at the individual measure level (electric savings, incremental cost, participation levels, avoided costs, and energy costs) to calculate measure level savings and cost-effectiveness. The savings at the measure-level are subtotaled for each program and sector and finally for the portfolio. At the program and sector level the model calculates program level cost-effectiveness, program incentive and non-incentive costs, total program costs. The outputs are compared against target savings goals, spending caps, and cost-effectiveness limits.

The TRC test was the primary test used to analyze the cost-effectiveness of PECO's energy efficiency portfolio. The TRC test measures the total net resource expenditures of an energy efficiency program from the point of view of the utility and its ratepayers. Resource costs include changes in supply and participant costs. A program that passes this test (i.e., a ratio greater than 1.0) is viewed as beneficial to the utility and its customers because the savings in electric costs outweigh the costs incurred by the utility and its customers. Of particular note, per the PA PUC guidelines, measure lifetime is capped at 15 years, and non-electric benefits are included in the savings calculations (e.g. complementary natural gas savings from an electric efficiency measure). The following section outlines Guidehouse's methodology for conducting the cost-effectiveness analysis including an explanation of key inputs and assumptions.

Incremental Measure Costs

Estimates of incremental measure costs were developed using the 2026 SWE IMC Database. Additionally, expert judgement from PECO's implementation contractors were used to refine saving and cost estimates where appropriate, such as for direct install measures where actual costs may be used.

Incentive Costs

Incentive amounts for each measure were developed using industry standards benchmarks. These initial estimates were further refined based on careful consideration of the market for each measure or set of measures.

Administrative Costs

To determine the administrative costs, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include program design, administrative spending, EDC delivery costs, CSP delivery fees, marketing, EM&V, AEPS registration support and other expenditures.

Appendix C. Program by Program Savings, Costs, and TRC Results

Table 4748. Summary of EE&C Costs by Sector and Program

(Describe)														
Residential Portfolio (incl. Low-Income)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$163,165	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Income-Eligible Low-Income Energy Efficiency	\$34,330,888, 157,402	\$0	\$0	\$0	\$9,219,672, 9,670	\$3,073,224, 3,073,225	\$0	\$0	\$0	\$46,623,784, 6,450,297	\$646,730	\$157	\$3,886,241, 4,614,121
	Income-Eligible Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total ⁵	\$77,172,235, 998,749	\$0	\$0	\$0	\$48,223,069, 223,067	\$11,265,135, 11,265,136	\$0	\$0	\$0	\$136,660,438, 136,486,952	\$296,301	\$138,139	\$1,434,589, 1,462,398
Small C&I	Non-Residential Energy Efficiency	\$66,587,232, 986,024	\$0	\$0	\$0	\$34,814,665, 814,664	\$1,155,777	\$0	\$33,423	\$0	\$102,591,096, 100,989,888	\$232,236	\$70,72	\$1,458,638, 1,473,492
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Income-Eligible Low-Income Energy Efficiency	\$2,854,674, 2,941,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574, 378,317	\$472,488	\$23,21	\$3,400,476, 2,687,652

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	Sector Total	\$69,645,338 130,873	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$107,367,377 105,852,912	\$237,242	\$69,71	\$1,497,440 1,506,333
Large C&I	Non-Residential Energy Efficiency	\$68,761,645 388,160	\$0	\$0	\$0	\$41,142,531 142,530	\$1,363,220	\$0	\$39,327	\$0	\$111,306,722 112,933,237	\$209,206	\$69	\$1,157,362 1,139,321
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Income-Eligible Low-Income Energy Efficiency	\$2,854,674 1,417	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574 378,317	\$472,488	\$23,21	\$3,400,476 2,687,652
	Sector Total	\$71,819,751 533,009	\$0	\$0	\$0	\$42,430,978	\$1,792,947 792,948	\$0	\$39,327	\$0	\$116,083,003 117,796,261	\$214,211	\$69,68	\$1,190,108 1,167,948

Table 4849. Allocation of Common Costs to Applicable Customer Sector

Marketing	\$20,400,000	First Year MWh Savings	\$7,592,659 6,382,568	\$6,379,070 6,152,692	\$6,428,271 7,864,741
Administrative	\$4,700,000	First Year MWh Savings	\$1,749,289 1,470,493	\$1,469,688 1,417,532	\$1,481,023 1,811,975
Program Design	\$8,540,000 8,514,690	First Year MWh Savings	\$3,178,496 2,663,999	\$2,670,454 2,568,052	\$2,691,051 3,282,639
EM&V	\$19,600,000	First Year MWh Savings	\$7,294,908 6,132,271	\$6,128,911 5,911,410	\$6,176,182 7,556,320
EDC Delivery Costs	\$11,035,012 11,035,010	First Year MWh Savings	\$4,107,112 3,452,534	\$3,450,643 3,328,187	\$3,477,257 4,254,289
Other (Describe) Other ¹	\$3,000,000	First Year MWh Savings	\$1,116,568 938,613	\$938,099 904,808	\$945,334 1,156,580
Totals	\$67,275,012 67,249,700		\$25,039,032 21,040,478	\$21,036,864 20,282,680	\$21,199,117 25,926,542
SWE Cost	\$0		\$0	\$0	\$0

¹ Includes training, conferences, licenses, travel, and critical contract costs

Table 4950. Summary of Portfolio EE&C Costs

Residential (Including Low-Income)	\$136,660,438 136,486,952	\$25,039,032 21,040,478	\$161,699,470 157,527,430

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Small C&I	\$107,322,978	<u>105,852,914</u>	\$21,036,864	<u>20,282,680</u>	\$128,359,841	<u>126,135,594</u>
Large C&I	\$116,127,403	<u>117,796,262</u>	\$21,199,117	<u>25,926,542</u>	\$137,326,519	<u>143,722,804</u>
Totals	\$360,110,819	<u>360,136,128</u>	\$67,275,012	<u>67,249,700</u>	\$427,385,831	<u>427,385,830</u>

Table 5051. TRC Benefits (Gross)

/Subprogram		GrossNet		BenefitsBe		nefits ⁵							
Residential Energy Efficiency	PY18	~~1.0~~ <u>0</u>	~~0.93~~ <u>0.91</u>	~~\$8,089,706~~ <u>\$47,656,374</u>	~~\$6,649~~ <u>\$6,649</u>	~~\$62,393,511~~ <u>\$15,882,121</u>	~~\$31,653,251~~ <u>\$10,180,831</u>	~~\$0~~ <u>\$0</u>	~~\$57,715,467~~ <u>\$42</u>				
Residential Energy Efficiency	PY19	~~1.0~~ <u>0</u>	0.91	~~\$8,366,795~~ <u>\$48,063,439</u>	~~\$6,649~~ <u>\$6,649</u>	~~\$63,078,585~~ <u>\$15,383,141</u>	~~\$31,552,291~~ <u>\$10,422,961</u>	~~\$0~~ <u>\$0</u>	~~\$57,357,530~~ <u>\$27</u>				
Residential Energy Efficiency	PY20	~~1.0~~ <u>0</u>	0.77	~~\$8,671,930~~ <u>\$58,374,660</u>	~~\$6,650~~ <u>\$6,650</u>	~~\$73,695,820~~ <u>\$15,376,171</u>	~~\$30,815,341~~ <u>\$10,777,111</u>	~~\$0~~ <u>\$0</u>	~~\$56,968,633~~ <u>\$80</u>				
Residential Energy Efficiency	PY21	~~1.0~~ <u>0</u>	0.75	~~\$8,929,106~~ <u>\$58,413,793</u>	~~\$6,650~~ <u>\$6,650</u>	~~\$73,992,966~~ <u>\$15,267,191</u>	~~\$29,260,381~~ <u>\$11,003,141</u>	~~\$0~~ <u>\$0</u>	~~\$55,531,725~~ <u>\$02</u>				
Residential Energy Efficiency	PY22	~~1.0~~ <u>0</u>	0.74	~~\$9,192,827~~ <u>\$58,452,475</u>	~~\$6,647~~ <u>\$6,647</u>	~~\$74,292,624~~ <u>\$14,917,121</u>	~~\$29,034,241~~ <u>\$11,269,951</u>	~~\$0~~ <u>\$0</u>	~~\$55,220,464~~ <u>\$21</u>				
Residential Energy Efficiency Total		<u>1.00</u>	<u>0.80</u>	\$43,248	\$33,245	<u>\$347,450,350</u> <u>,877</u>	<u>\$76,825,761</u> <u>672</u>	<u>\$152,315,151</u> <u>51,705</u>	<u>\$53,652,531</u> <u>695</u>	\$0	\$0	<u>\$282,792,282</u> <u>,073</u>	
Residential Home Energy Reports	PY18	~~1.0~~ <u>0</u>	4.96	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$0	\$11,622	
Residential Home Energy Reports	PY19	~~1.0~~ <u>0</u>	5.14	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$0	\$18,692	
Residential Home Energy Reports	PY20	~~1.0~~ <u>0</u>	4.80	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$0	\$12,631	
Residential Home Energy Reports	PY21	~~1.0~~ <u>0</u>	3.88	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$0	\$10,801	
Residential Home Energy Reports	PY22	~~1.0~~ <u>0</u>	3.52	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$0	\$9,116	
Residential Home Energy Reports Total		<u>1.00</u>	<u>4.49</u>	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$0	\$62,862	

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~~Low-Income~~ Low-Income Energy Efficiency	PY18	~~1.00~~ 1.35	~~1.37~~ 1.35	~~7,650~~ 7,995	~~1,874~~ 1,837	\$3,020	~~14,047~~ 14,202	~~3,467~~ 3,202	~~13,312~~ 13,638	~~2,477~~ 2,530	\$0	~~19,257~~ 19,460
~~Low-Income~~ Low-Income Energy Efficiency	PY19	~~1.00~~ 1.35	~~1.37~~ 1.35	~~7,995~~ 8,152	~~1,837~~ 1,837	\$3,033	~~14,202~~ 13,022	~~3,202~~ 3,112	~~13,638~~ 12,395	~~2,530~~ 2,022	\$0	~~19,460~~ 17,529
~~Low-Income~~ Low-Income Energy Efficiency	PY20	~~1.00~~ 1.33	~~1.36~~ 1.33	~~8,334~~ 8,493	~~1,769~~ 1,769	\$3,060	~~14,519~~ 13,322	~~3,304~~ 3,124	~~13,777~~ 12,531	~~2,612~~ 2,090	\$0	~~19,691~~ 17,745
~~Low-Income~~ Low-Income Energy Efficiency	PY21	~~1.00~~ 1.29	~~1.31~~ 1.29	~~8,667~~ 8,691	~~1,728~~ 1,728	\$3,087	~~14,834~~ 13,506	~~3,254~~ 3,056	~~13,550~~ 12,184	~~2,699~~ 2,141	\$0	~~19,503~~ 17,381
~~Low-Income~~ Low-Income Energy Efficiency	PY22	~~1.00~~ 1.23	~~1.27~~ 1.23	~~7,194~~ 6,722	~~2,140~~ 2,140	\$2,966	~~13,421~~ 11,828	~~2,748~~ 2,508	~~11,787~~ 10,091	~~2,548~~ 1,952	\$0	~~17,083~~ 14,551
~~Low-Income~~ Low-Income Energy Efficiency Total		~~1.00~~ 1.31		\$40,040	~~15,816~~ 9,347	\$15,167	~~71,023~~ 64,554	~~16,063~~ 15,072	~~66,064~~ 59,294	~~12,867~~ 10,186	\$0	~~94,994~~ 84,552
~~Low-Income~~ Low-Income Home Energy Reports	PY18	~~1.00~~ 7.78		\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
~~Low-Income~~ Low-Income Home Energy Reports	PY19	~~1.00~~ 7.18		\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
~~Low-Income~~ Low-Income Home Energy Reports	PY20	~~1.00~~ 6.80		\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
~~Low-Income~~ Low-Income Home Energy Reports	PY21	~~1.00~~ 6.31		\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536

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~~Low-Income~~ Low-Income Home Energy Reports	PY22	~~1.01~~ 1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
~~Low-Income~~ Low-Income Home Energy Reports Total		~~1.00~~ 1.00		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
Non-Residential Energy Efficiency	PY18	~~1.01~~ 1.00	~~1.56~~ 1.50	~~\$21,105~~ \$21,103	~~\$78,457~~ \$78,459	\$13,076	\$112,638	\$52,133	\$116,672	\$36	~~\$7,072~~ \$7,072	~~\$175,913~~ \$175,913
Non-Residential Energy Efficiency	PY19	~~1.01~~ 1.00	~~1.57~~ 1.47	~~\$26,968~~ \$26,957	~~\$101,443~~ \$101,485	\$14,936	~~\$143,347~~ \$143,993	~~\$64,384~~ \$65,867	~~\$152,603~~ \$155,479	~~\$104~~ \$109	~~\$8,550~~ \$8,550	~~\$225,640~~ \$225,458
Non-Residential Energy Efficiency	PY20	~~1.01~~ 1.00	~~1.40~~ 1.33	~~\$29,959~~ \$29,808	~~\$129,049~~ \$129,215	\$17,236	~~\$176,244~~ \$176,259	~~\$71,161~~ \$71,977	~~\$166,875~~ \$165,799	~~\$172~~ \$178	~~\$9,338~~ \$9,338	~~\$247,546~~ \$247,957
Non-Residential Energy Efficiency	PY21	~~1.01~~ 1.00	~~1.47~~ 1.41	~~\$33,205~~ \$33,050	~~\$109,050~~ \$109,621	\$17,799	~~\$160,055~~ \$160,470	~~\$68,362~~ \$69,134	~~\$158,497~~ \$157,817	~~\$56~~ \$61	~~\$8,303~~ \$8,303	~~\$235,217~~ \$235,015
Non-Residential Energy Efficiency	PY22	~~1.01~~ 1.00	~~1.57~~ 1.54	~~\$24,112~~ \$23,840	~~\$79,227~~ \$76,785	\$15,502	~~\$118,840~~ \$116,127	~~\$54,697~~ \$54,944	~~\$125,133~~ \$124,246	~~\$75~~ \$80	~~\$7,072~~ \$7,072	~~\$186,977~~ \$179,272
Non-Residential Energy Efficiency Total		~~1.00~~ 1.00		~~\$135,349~~ \$135,374	~~\$497,226~~ \$504,565	\$78,549	~~\$711,124~~ \$718,488	~~\$310,737~~ \$314,055	~~\$719,780~~ \$720,013	~~\$443~~ \$465	~~\$40,33~~ \$40,33	~~\$1,071,293~~ \$1,034,546
Total		~~1.01~~ 1.00		~~\$218,637~~ \$218,663	~~\$783,999~~ \$788,296	\$141,473	~~\$1,144,110~~ \$1,148,432	~~\$427,081~~ \$429,255	~~\$981,233~~ \$987,087	~~\$66,962~~ \$66,346	~~\$40,33~~ \$40,33	~~\$1,515,610~~ \$1,467,702

Table 5152. TRC Benefits (Net)

Residential Energy Efficiency	PY18	0.655	~~0.85~~ 0.86	~~\$8,247~~ \$7,060	~~\$28,288~~ \$22,078	~~\$6,491~~ \$6,649	~~\$43,026~~ \$35,787	~~\$10,520~~ \$8,459	~~\$19,629~~ \$16,672	~~\$6,581~~ \$5,495	\$0	~~\$36,730~~ \$30,626
Residential Energy	PY19	0.655	~~0.83~~ 0.85	~~\$8,524~~ \$7,952	~~\$28,459~~ \$26,04	~~\$6,491~~ \$6,649	~~\$43,474~~ \$40,64	~~\$10,221~~ \$9,32	~~\$19,279~~ \$19,0	~~\$6,748~~ \$6,354	\$0	~~\$36,248~~ \$34,74

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Efficiency					<u>8</u>		<u>9</u>	<u>3</u>	<u>67</u>			<u>3</u>
Residential Energy Efficiency	PY20	0.655	~~0.71~~ <u>0.74</u>	~~\$8,830~~ <u>\$9,300</u>	~~\$35,110~~ <u>\$40,085</u>	~~\$6,491~~ <u>\$6,650</u>	~~\$50,430~~ <u>\$56,034</u>	~~\$10,249~~ <u>\$11,196</u>	~~\$18,458~~ <u>\$22,532</u>	~~\$6,989~~ <u>\$7,799</u>	\$0	~~\$35,696~~ <u>\$41,527</u>
Residential Energy Efficiency	PY21	0.655	~~0.68~~ <u>0.72</u>	~~\$9,088~~ <u>\$10,667</u>	~~\$35,046~~ <u>\$48,331</u>	~~\$6,491~~ <u>\$6,650</u>	~~\$50,626~~ <u>\$65,648</u>	~~\$10,213~~ <u>\$13,002</u>	~~\$17,107~~ <u>\$25,198</u>	~~\$7,149~~ <u>\$9,304</u>	\$0	~~\$34,469~~ <u>\$47,503</u>
Residential Energy Efficiency	PY22	0.655	~~0.69~~ <u>0.70</u>	~~\$9,349~~ <u>\$8,270</u>	~~\$34,981~~ <u>\$28,323</u>	~~\$6,491~~ <u>\$6,647</u>	~~\$50,821~~ <u>\$43,240</u>	~~\$10,022~~ <u>\$8,256</u>	~~\$17,886~~ <u>\$15,929</u>	~~\$7,335~~ <u>\$6,230</u>	\$0	~~\$35,243~~ <u>\$30,415</u>
Residential Energy Efficiency Total		0.655		~~\$44,038~~ <u>\$43,248</u>	~~\$161,884~~ <u>\$164,865</u>	~~\$32,456~~ <u>\$33,245</u>	~~\$238,377~~ <u>\$241,358</u>	~~\$51,225~~ <u>\$50,236</u>	~~\$92,360~~ <u>\$99,397</u>	~~\$34,801~~ <u>\$35,181</u>	\$0	~~\$178,386~~ <u>\$184,814</u>
Residential Home Energy Reports	PY18	1.000	~~4.95~~ <u>4.96</u>	\$0	\$0	~~\$2,267~~ <u>\$2,342</u>	~~\$2,267~~ <u>\$2,342</u>	~~\$3,402~~ <u>\$3,400</u>	~~\$7,820~~ <u>\$8,222</u>	\$0	\$0	~~\$11,223~~ <u>\$11,622</u>
Residential Home Energy Reports	PY19	1.000	~~5.80~~ <u>5.14</u>	\$0	\$0	~~\$3,061~~ <u>\$3,639</u>	~~\$3,061~~ <u>\$3,639</u>	~~\$7,148~~ <u>\$7,135</u>	~~\$10,613~~ <u>\$11,557</u>	\$0	\$0	~~\$17,761~~ <u>\$18,692</u>
Residential Home Energy Reports	PY20	1.000	~~3.82~~ <u>4.80</u>	\$0	\$0	~~\$3,061~~ <u>\$2,634</u>	~~\$3,061~~ <u>\$2,634</u>	~~\$5,046~~ <u>\$5,028</u>	~~\$6,637~~ <u>\$7,602</u>	\$0	\$0	~~\$11,683~~ <u>\$12,631</u>
Residential Home Energy Reports	PY21	1.000	~~3.11~~ <u>3.88</u>	\$0	\$0	~~\$3,061~~ <u>\$2,783</u>	~~\$3,061~~ <u>\$2,783</u>	~~\$4,032~~ <u>\$4,006</u>	~~\$5,476~~ <u>\$6,795</u>	\$0	\$0	~~\$9,508~~ <u>\$10,801</u>
Residential Home Energy Reports	PY22	1.000	~~2.84~~ <u>3.52</u>	\$0	\$0	~~\$3,061~~ <u>\$2,590</u>	~~\$3,061~~ <u>\$2,590</u>	~~\$3,148~~ <u>\$3,115</u>	~~\$5,540~~ <u>\$6,000</u>	\$0	\$0	~~\$8,688~~ <u>\$9,116</u>
Residential Home Energy Reports Total		1.000		\$0	\$0	~~\$14,513~~ <u>\$13,989</u>	~~\$14,513~~ <u>\$13,989</u>	~~\$22,776~~ <u>\$22,684</u>	~~\$36,087~~ <u>\$40,177</u>	\$0	\$0	~~\$58,863~~ <u>\$62,862</u>
Low-Income Energy Efficiency	PY18	1.000	~~1.52~~ <u>1.35</u>	~~\$8,372~~ <u>\$7,981</u>	~~\$2,655~~ <u>\$1,874</u>	~~\$2,499~~ <u>\$3,020</u>	~~\$13,525~~ <u>\$12,875</u>	~~\$3,494~~ <u>\$3,273</u>	~~\$14,642~~ <u>\$12,094</u>	~~\$2,456~~ <u>\$1,980</u>	\$0	~~\$20,592~~ <u>\$17,347</u>
Low-Income Energy Efficiency	PY19	1.000	~~1.52~~ <u>1.35</u>	~~\$8,529~~ <u>\$8,152</u>	~~\$2,640~~ <u>\$1,837</u>	~~\$2,499~~ <u>\$3,033</u>	~~\$13,668~~ <u>\$13,022</u>	~~\$3,327~~ <u>\$3,112</u>	~~\$14,939~~ <u>\$12,395</u>	~~\$2,511~~ <u>\$2,022</u>	\$0	~~\$20,776~~ <u>\$17,529</u>
Low-Income Energy Efficiency	PY20	1.000	~~1.49~~ <u>1.33</u>	~~\$8,896~~ <u>\$8,493</u>	~~\$2,563~~ <u>\$1,769</u>	~~\$2,499~~ <u>\$3,060</u>	~~\$13,957~~ <u>\$13,322</u>	~~\$3,345~~ <u>\$3,124</u>	~~\$14,875~~ <u>\$12,531</u>	~~\$2,594~~ <u>\$2,090</u>	\$0	~~\$20,815~~ <u>\$17,745</u>
Low-Income Energy Efficiency	PY21	1.000	~~1.44~~ <u>1.29</u>	~~\$9,256~~ <u>\$8,691</u>	~~\$2,492~~ <u>\$1,728</u>	~~\$2,499~~ <u>\$3,087</u>	~~\$14,246~~ <u>\$13,506</u>	~~\$3,309~~ <u>\$3,056</u>	~~\$14,523~~ <u>\$12,184</u>	~~\$2,683~~ <u>\$2,141</u>	\$0	~~\$20,516~~ <u>\$17,381</u>
Low-Income Energy Efficiency	PY22	1.000	~~1.42~~ <u>1.23</u>	~~\$7,662~~ <u>\$6,722</u>	~~\$2,793~~ <u>\$2,140</u>	~~\$2,499~~ <u>\$2,966</u>	~~\$12,953~~ <u>\$11,828</u>	~~\$2,808~~ <u>\$2,508</u>	~~\$13,015~~ <u>\$10,091</u>	~~\$2,537~~ <u>\$1,952</u>	\$0	~~\$18,360~~ <u>\$14,551</u>
Low-Income Energy		1.000		~~\$42,714~~ <u>\$40,000</u>	~~\$13,142~~ <u>\$9,347</u>	~~\$12,493~~ <u>\$15,100</u>	~~\$68,349~~ <u>\$64,555</u>	~~\$16,284~~ <u>\$15,000</u>	~~\$71,994~~ <u>\$59,200</u>	~~\$12,781~~ <u>\$10,100</u>	\$0	~~\$101,058~~ <u>\$84,500</u>

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Efficiency Total				<u>40</u>		<u>67</u>	<u>4</u>	<u>72</u>	<u>94</u>	<u>86</u>		<u>52</u>
Low-Income Home Energy Reports	PY18	1.000	~~18.31~~ <u>7.78</u>	\$0	\$0	~~\$72~~ <u>172</u>	~~\$72~~ <u>172</u>	\$299	~~\$1,011~~ <u>1,041</u>	\$0	\$0	~~\$1,310~~ <u>1,340</u>
Low-Income Home Energy Reports	PY19	1.000	~~8.04~~ <u>7.18</u>	\$0	\$0	~~\$78~~ <u>91</u>	~~\$78~~ <u>91</u>	\$139	~~\$489~~ <u>512</u>	\$0	\$0	~~\$628~~ <u>651</u>
Low-Income Home Energy Reports	PY20	1.000	~~7.85~~ <u>6.80</u>	\$0	\$0	~~\$78~~ <u>95</u>	~~\$78~~ <u>95</u>	~~\$131~~ <u>130</u>	~~\$482~~ <u>517</u>	\$0	\$0	~~\$613~~ <u>648</u>
Low-Income Home Energy Reports	PY21	1.000	~~6.35~~ <u>6.31</u>	\$0	\$0	~~\$78~~ <u>85</u>	~~\$78~~ <u>85</u>	~~\$110~~ <u>109</u>	~~\$387~~ <u>427</u>	\$0	\$0	~~\$496~~ <u>536</u>
Low-Income Home Energy Reports	PY22	1.000	~~6.15~~ <u>6.12</u>	\$0	\$0	~~\$78~~ <u>81</u>	~~\$78~~ <u>81</u>	~~\$95~~ <u>94</u>	~~\$385~~ <u>400</u>	\$0	\$0	~~\$480~~ <u>494</u>
Low-Income Home Energy Reports Total		1.000		\$0	\$0	~~\$384~~ <u>524</u>	~~\$384~~ <u>524</u>	~~\$774~~ <u>772</u>	~~\$2,754~~ <u>2,897</u>	\$0	\$0	~~\$3,528~~ <u>3,669</u>
Non-Residential Energy Efficiency	PY18	0.684	~~1.44~~ <u>1.42</u>	~~\$21,105~~ <u>21,103</u>	~~\$47,005~~ <u>47,008</u>	\$13,076	\$81,187	~~\$36,127~~ <u>35,664</u>	~~\$75,768~~ <u>79,815</u>	\$25	~~\$4,838~~ <u>2</u>	~~\$116,757~~ <u>115,506</u>
Non-Residential Energy Efficiency	PY19	0.684	~~1.45~~ <u>1.40</u>	~~\$26,968~~ <u>27,572</u>	~~\$60,878~~ <u>65,505</u>	\$14,936	~~\$102,782~~ <u>108,013</u>	~~\$44,762~~ <u>45,059</u>	~~\$97,937~~ <u>106,363</u>	~~\$70~~ <u>75</u>	~~\$5,849~~ <u>2</u>	~~\$148,618~~ <u>151,499</u>
Non-Residential Energy Efficiency	PY20	0.684	1.28	~~\$29,959~~ <u>29,808</u>	~~\$78,819~~ <u>80,347</u>	\$17,236	~~\$126,013~~ <u>127,392</u>	~~\$49,639~~ <u>49,240</u>	~~\$105,590~~ <u>113,423</u>	~~\$117~~ <u>122</u>	~~\$6,388~~ <u>2</u>	~~\$161,734~~ <u>162,787</u>
Non-Residential Energy Efficiency	PY21	0.684	~~1.31~~ <u>1.35</u>	~~\$33,205~~ <u>33,050</u>	~~\$64,112~~ <u>64,551</u>	\$17,799	~~\$115,116~~ <u>115,400</u>	~~\$47,817~~ <u>47,295</u>	~~\$97,719~~ <u>107,963</u>	~~\$38~~ <u>42</u>	~~\$5,680~~ <u>2</u>	~~\$151,254~~ <u>155,301</u>
Non-Residential Energy Efficiency	PY22	0.684	~~1.44~~ <u>1.45</u>	~~\$24,112~~ <u>23,840</u>	~~\$46,582~~ <u>44,998</u>	\$15,502	~~\$86,196~~ <u>84,340</u>	~~\$38,461~~ <u>37,587</u>	~~\$80,966~~ <u>84,996</u>	~~\$51~~ <u>55</u>	~~\$4,838~~ <u>2</u>	~~\$124,316~~ <u>122,640</u>
Non-Residential Energy Efficiency Total		0.684		~~\$135,349~~ <u>135,374</u>	~~\$297,396~~ <u>302,408</u>	\$78,549	~~\$511,294~~ <u>516,332</u>	~~\$216,806~~ <u>214,845</u>	~~\$457,980~~ <u>492,561</u>	~~\$301~~ <u>318</u>	~~\$27,592~~ <u>9</u>	~~\$702,679~~ <u>707,733</u>
Total		0.73		~~\$222,100~~ <u>218,663</u>	~~\$472,422~~ <u>476,620</u>	~~\$138,394~~ <u>141,473</u>	~~\$832,917~~ <u>836,756</u>	~~\$307,866~~ <u>303,609</u>	~~\$661,175~~ <u>694,326</u>	~~\$47,882~~ <u>45,685</u>	~~\$27,592~~ <u>9</u>	~~\$1,044,515~~ <u>1,043,630</u>

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Appendix D. Avoided Cost Calculator

PECO created the avoided costs after gathering publicly available data sets as inputs to support the avoided cost analysis. PECO followed direction from the PUC in the TRC Order. We have organized the information according to the tabs in the PUC's Excel avoided cost calculator.

General Instructions

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator

This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references.

For Phase V, the start year shall be set to Program Year 18 (6/1/2026 - 5/31/2027).

The user shall gather publicly available data sets as inputs.

This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

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Data Needed	TRC Test Order Section	Input Tab
EDC Name		General Inputs
Start Year		General Inputs
Inflation Rate	A.7 Page 8	General Inputs
Plant Heat Rates	B.2.b.v Page 18	General Inputs
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15	Elec Futures
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15	Elec Futures
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16	NG Futures
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16	NG Futures
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16	Adjustments
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18	BLS Input
PJM Base Residual Auction Results	B.7 Page 21	Generation Capacity
Transmission and Distribution Capacity Costs	B.8 Page 22	T&D Capacity
AEPS Avoided Costs	B.9 Page 24	AEPS
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25	DRIPE
Benefits Incurred Through Reduced Arrearages Activity	B.12 Page 29	Arrearages

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Monetary Issues:	All output dollars are nominal
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

General Inputs

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General			Calendar			
Company Name	PECO		Act 129 PY	PY Start	PY End	Avoided Energy YR
Start Year (Program)	18	2027	18	2026	2027	2027
Discount Rate	5%	TRC Test Order A.4 page 10	19	2027	2028	2028
Inflation Rate	2%	TRC Test Order B.4 page 18	20	2028	2029	2029
Plant Specifications			21	2029	2030	2030
	Heat Rate (Btu/kWh)		22	2030	2031	2031
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23	2031	2032	2032
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24	2032	2033	2033
EDC Natural Gas Futures Source			25	2033	2034	2034
Electric Distribution Companies	EDC Abbreviation	NYMEX NG Futures Source	26	2034	2035	2035
Duquesne Light Co	DLC	Tetco M-3	27	2035	2036	2036
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28	2036	2037	2037
PECO Energy Co	PECO	Transco 6 (Non-NY)	29	2037	2038	2038
Pennsylvania Electric Co	Penelec	Tetco M-3	30	2038	2039	2039
Pennsylvania Power Co	Penn Power	Tetco M-3	31	2039	2040	2040
PPL Utilities	PPL	Transco 6 (Non-NY)	32	2040	2041	2041
West Penn Power Co	West Penn	Tetco M-3	33	2041	2042	2042
Seasonal Definitions			34	2042	2043	2043
Jan	Winter		35	2043	2044	2044
Feb	Winter		36	2044	2045	2045
Mar	Shoulder		37	2045	2046	2046
Apr	Shoulder		38	2046	2047	2047
May	Summer		39	2047	2048	2048
Jun	Summer		40	2048	2049	2049
Jul	Summer		41	2049	2050	2050
Aug	Summer		42	2050	2051	2051
Sep	Summer		43	2051	2052	2052
Oct	Shoulder		44	2052	2053	2053
Nov	Shoulder		45	2053	2054	2054
Dec	Winter		46	2054	2055	2055
			47	2055	2056	2056

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Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On- Peak	Summer Off- Peak	Winter On- Peak	Winter Off- Peak	Shoulder On- Peak	Shoulder Off- Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$79.44	\$58.18	\$94.46	\$83.19	\$72.51	\$61.06	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$91.75	\$70.15	\$107.40	\$96.45	\$84.44	\$73.01	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$101.74	\$79.21	\$117.92	\$106.30	\$94.21	\$82.14	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$63.14	\$55.29	\$102.46	\$82.37	\$66.40	\$57.53	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$55.63	\$38.33	\$76.67	\$64.52	\$50.84	\$41.06	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	
23	2032	\$55.81	\$38.50	\$78.16	\$65.59	\$51.17	\$41.34	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	Segment 2
24	2033	\$57.99	\$40.04	\$81.71	\$68.08	\$53.28	\$42.84	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$60.45	\$41.79	\$85.93	\$71.04	\$55.91	\$44.70	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$62.74	\$43.41	\$89.83	\$73.77	\$58.49	\$46.52	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	
27	2036	\$64.89	\$44.94	\$93.66	\$76.46	\$60.67	\$48.08	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$65.88	\$45.68	\$94.92	\$77.38	\$61.71	\$48.84	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	Segment 3
29	2038	\$65.29	\$45.33	\$93.25	\$76.28	\$61.04	\$48.43	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$64.89	\$45.10	\$92.04	\$75.50	\$60.57	\$48.17	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$65.31	\$45.45	\$92.80	\$76.08	\$61.02	\$48.53	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$66.60	\$46.39	\$95.67	\$78.11	\$62.43	\$49.55	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$68.02	\$47.42	\$98.85	\$80.36	\$63.98	\$50.68	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$69.48	\$48.48	\$102.13	\$82.67	\$65.59	\$51.84	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$70.47	\$49.23	\$104.28	\$84.21	\$66.68	\$52.65	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$71.24	\$49.82	\$105.86	\$85.37	\$67.51	\$53.29	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$31.50	\$22.51	\$9.19	\$18.85	\$23.29	\$22.90	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

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LI Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$137.58	\$116.32	\$152.60	\$141.33	\$130.65	\$119.20	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$151.05	\$129.45	\$166.70	\$155.75	\$143.74	\$132.31	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$162.23	\$139.70	\$178.41	\$166.79	\$154.70	\$142.63	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$124.83	\$116.99	\$164.16	\$144.07	\$128.10	\$119.23	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$118.57	\$101.26	\$139.60	\$127.45	\$113.77	\$104.00	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	Segment 2
23	2032	\$120.01	\$102.69	\$142.35	\$129.78	\$115.36	\$105.53	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	
24	2033	\$123.46	\$105.52	\$147.18	\$133.56	\$118.76	\$108.32	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$127.23	\$108.57	\$152.72	\$137.82	\$122.70	\$111.49	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$130.86	\$111.53	\$157.95	\$141.89	\$126.61	\$114.64	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	Segment 3
27	2036	\$134.37	\$114.43	\$163.14	\$145.94	\$130.15	\$117.56	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$136.75	\$116.55	\$165.79	\$148.25	\$132.58	\$119.71	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	
29	2038	\$137.58	\$117.62	\$165.54	\$148.57	\$133.33	\$120.72	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$138.63	\$118.84	\$165.77	\$149.23	\$134.31	\$121.90	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$140.52	\$120.66	\$168.01	\$151.29	\$136.23	\$123.74	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$143.31	\$123.10	\$172.38	\$154.82	\$139.14	\$126.27	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$146.27	\$125.67	\$177.10	\$158.61	\$142.23	\$128.93	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$149.29	\$128.30	\$181.94	\$162.49	\$145.40	\$131.66	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$151.88	\$130.64	\$185.69	\$165.62	\$148.09	\$134.06	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$154.28	\$132.86	\$188.90	\$168.40	\$150.55	\$136.32	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$116.20	\$107.21	\$93.89	\$103.55	\$107.99	\$107.59	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

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Elec Futures

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Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal \$/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal \$/MWh)	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)
1	Jan-26	\$82.25	\$66.70	\$73.22	\$59.38
2	Feb-26	\$72.35	\$62.30	\$64.41	\$55.46
3	Mar-26	\$53.00	\$47.25	\$47.18	\$42.07
4	Apr-26	\$50.75	\$38.50	\$45.18	\$34.28
5	May-26	\$55.90	\$38.15	\$49.77	\$33.96
6	Jun-26	\$57.35	\$36.90	\$51.06	\$32.85
7	Jul-26	\$78.35	\$44.20	\$69.75	\$39.35
8	Aug-26	\$69.50	\$41.30	\$61.87	\$36.77
9	Sep-26	\$58.65	\$36.40	\$52.21	\$32.41
10	Oct-26	\$53.00	\$38.30	\$47.18	\$34.10
11	Nov-26	\$56.80	\$44.95	\$50.57	\$40.02
12	Dec-26	\$69.90	\$58.90	\$62.23	\$52.44
13	Jan-27	\$92.85	\$76.50	\$82.66	\$68.11
14	Feb-27	\$81.80	\$69.85	\$72.82	\$62.19
15	Mar-27	\$61.70	\$50.75	\$54.93	\$45.18
16	Apr-27	\$55.50	\$40.70	\$49.41	\$36.23
17	May-27	\$56.80	\$39.85	\$50.57	\$35.48
18	Jun-27	\$58.35	\$38.60	\$51.95	\$34.36
19	Jul-27	\$79.80	\$45.90	\$71.04	\$40.86
20	Aug-27	\$70.60	\$42.55	\$62.85	\$37.88
21	Sep-27	\$59.65	\$38.90	\$53.10	\$34.63
22	Oct-27	\$53.95	\$39.85	\$48.03	\$35.48
23	Nov-27	\$57.90	\$46.30	\$51.55	\$41.22
24	Dec-27	\$71.10	\$61.40	\$63.30	\$54.66
25	Jan-28	\$97.00	\$80.75	\$86.36	\$71.89
26	Feb-28	\$85.35	\$73.80	\$75.98	\$65.70
27	Mar-28	\$64.35	\$53.85	\$57.29	\$47.94
28	Apr-28	\$57.90	\$43.40	\$51.55	\$38.64
29	May-28	\$59.35	\$42.20	\$52.84	\$37.57
30	Jun-28	\$60.95	\$41.00	\$54.26	\$36.50
31	Jul-28	\$83.35	\$48.70	\$74.20	\$43.36
32	Aug-28	\$73.80	\$45.15	\$65.70	\$40.20
33	Sep-28	\$62.30	\$41.40	\$55.46	\$36.86
34	Oct-28	\$56.35	\$42.20	\$50.17	\$37.57
35	Nov-28	\$60.35	\$48.15	\$53.73	\$42.87
36	Dec-28	\$74.25	\$65.15	\$66.10	\$58.00
37	Jan-29	\$100.35	\$83.20	\$89.34	\$74.07
38	Feb-29	\$88.35	\$76.00	\$78.66	\$67.66
39	Mar-29	\$66.60	\$55.45	\$59.29	\$49.37
40	Apr-29	\$60.05	\$44.65	\$53.46	\$39.75
41	May-29	\$61.40	\$43.55	\$54.66	\$38.77
42	Jun-29	\$63.10	\$42.25	\$56.18	\$37.61
43	Jul-29	\$86.30	\$50.15	\$76.83	\$44.65
44	Aug-29	\$76.30	\$46.50	\$67.93	\$41.40
45	Sep-29	\$64.50	\$42.65	\$57.42	\$37.97
46	Oct-29	\$58.25	\$43.55	\$51.86	\$38.77
47	Nov-29	\$62.55	\$49.60	\$55.69	\$44.16
48	Dec-29	\$76.80	\$67.15	\$68.37	\$59.78
49	Jan-30	\$87.20	\$60.05	\$77.63	\$53.46
50	Feb-30	\$74.70	\$51.44	\$66.50	\$45.80
51	Mar-30	\$38.06	\$26.21	\$33.88	\$23.33
52	Apr-30	\$29.59	\$20.38	\$26.35	\$18.14
53	May-30	\$26.86	\$18.50	\$23.91	\$16.47
54	Jun-30	\$28.40	\$19.56	\$25.28	\$17.41
55	Jul-30	\$30.15	\$20.76	\$26.84	\$18.48
56	Aug-30	\$29.72	\$20.47	\$26.46	\$18.22
57	Sep-30	\$26.46	\$18.22	\$23.55	\$16.22
58	Oct-30	\$25.18	\$17.34	\$22.42	\$15.44
59	Nov-30	\$35.10	\$24.17	\$31.24	\$21.52
60	Dec-30	\$55.56	\$38.26	\$49.46	\$34.06
End of Segment I					

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Real-Time, Load-Weighted LMPs (\$/MWh)

EDC	2020	2021	2022	2023	2024	Basis Factor
Western Hub	\$ 20.92	\$ 38.88	\$ 77.53	\$ 31.78	\$ 30.84	
PECO	\$ 19.29	\$ 33.55	\$ 71.67	\$ 23.63	\$ 29.87	89%

Source: PJM State of the Market Report, Tables in chapter 11

NG Futures

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 20XX Dollars)
[\$/MMBTU]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Real	\$2.72	\$2.78	\$2.64	\$2.58	\$2.64	\$2.77	\$2.87	\$3.22	\$3.48	\$3.60	\$3.63	\$3.61	\$3.52	\$3.38	\$3.26	\$3.22	\$3.25	\$3.30	\$3.34	\$3.35	\$3.33
Nominal	\$2.78	\$2.89	\$2.80	\$2.79	\$2.92	\$3.12	\$3.29	\$3.78	\$4.16	\$4.39	\$4.52	\$4.58	\$4.55	\$4.46	\$4.38	\$4.41	\$4.55	\$4.71	\$4.87	\$4.97	\$5.05

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Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
1	Jan-26	Jan	2026	\$4.28	\$7.61	\$6.03	\$7.61
2	Feb-26	Feb	2026	\$4.05	\$6.55	\$5.16	\$6.55
3	Mar-26	Mar	2026	\$3.69	\$3.56	\$2.69	\$3.56
4	Apr-26	Apr	2026	\$3.60	\$3.19	\$2.15	\$3.19
5	May-26	May	2026	\$3.62	\$3.00	\$1.97	\$3.00
6	Jun-26	Jun	2026	\$3.78	\$3.16	\$2.07	\$3.16
7	Jul-26	Jul	2026	\$3.97	\$3.36	\$2.20	\$3.36
8	Aug-26	Aug	2026	\$4.03	\$3.31	\$2.17	\$3.31
9	Sep-26	Sep	2026	\$3.99	\$3.01	\$1.96	\$3.01
10	Oct-26	Oct	2026	\$4.04	\$2.88	\$1.87	\$2.88
11	Nov-26	Nov	2026	\$4.25	\$3.76	\$2.53	\$3.76
12	Dec-26	Dec	2026	\$4.67	\$5.59	\$3.91	\$5.59
13	Jan-27	Jan	2027	\$4.90	\$8.24	\$5.83	\$8.24
14	Feb-27	Feb	2027	\$4.58	\$7.09	\$5.00	\$7.09
15	Mar-27	Mar	2027	\$3.92	\$3.79	\$2.60	\$3.79
16	Apr-27	Apr	2027	\$3.51	\$3.10	\$2.08	\$3.10
17	May-27	May	2027	\$3.49	\$2.87	\$1.90	\$2.87
18	Jun-27	Jun	2027	\$3.61	\$2.99	\$2.01	\$2.99
19	Jul-27	Jul	2027	\$3.77	\$3.15	\$2.13	\$3.15
20	Aug-27	Aug	2027	\$3.83	\$3.12	\$2.10	\$3.12
21	Sep-27	Sep	2027	\$3.80	\$2.82	\$1.89	\$2.82
22	Oct-27	Oct	2027	\$3.86	\$2.71	\$1.81	\$2.71
23	Nov-27	Nov	2027	\$4.06	\$3.58	\$2.44	\$3.58
24	Dec-27	Dec	2027	\$4.48	\$5.40	\$3.78	\$5.40
25	Jan-28	Jan	2028	\$4.76	\$8.09	\$5.81	\$8.09
26	Feb-28	Feb	2028	\$4.38	\$6.89	\$4.98	\$6.89
27	Mar-28	Mar	2028	\$3.75	\$3.62	\$2.59	\$3.62
28	Apr-28	Apr	2028	\$3.32	\$2.91	\$2.07	\$2.91
29	May-28	May	2028	\$3.30	\$2.68	\$1.90	\$2.68
30	Jun-28	Jun	2028	\$3.43	\$2.81	\$2.00	\$2.81
31	Jul-28	Jul	2028	\$3.60	\$2.98	\$2.12	\$2.98
32	Aug-28	Aug	2028	\$3.66	\$2.94	\$2.10	\$2.94
33	Sep-28	Sep	2028	\$3.63	\$2.66	\$1.89	\$2.66
34	Oct-28	Oct	2028	\$3.69	\$2.54	\$1.81	\$2.54
35	Nov-28	Nov	2028	\$3.88	\$3.40	\$2.44	\$3.40
36	Dec-28	Dec	2028	\$4.31	\$5.23	\$3.77	\$5.23
37	Jan-29	Jan	2029	\$4.58	\$7.91	\$6.08	\$7.91
38	Feb-29	Feb	2029	\$4.29	\$6.80	\$5.21	\$6.80
39	Mar-29	Mar	2029	\$3.59	\$3.46	\$2.71	\$3.46
40	Apr-29	Apr	2029	\$3.16	\$2.75	\$2.17	\$2.75
41	May-29	May	2029	\$3.14	\$2.52	\$1.99	\$2.52
42	Jun-29	Jun	2029	\$3.30	\$2.68	\$2.09	\$2.68
43	Jul-29	Jul	2029	\$3.49	\$2.87	\$2.22	\$2.87
44	Aug-29	Aug	2029	\$3.56	\$2.84	\$2.19	\$2.84
45	Sep-29	Sep	2029	\$3.54	\$2.56	\$1.98	\$2.56
46	Oct-29	Oct	2029	\$3.61	\$2.45	\$1.89	\$2.45
47	Nov-29	Nov	2029	\$3.80	\$3.32	\$2.55	\$3.32
48	Dec-29	Dec	2029	\$4.24	\$5.17	\$3.94	\$5.17
49	Jan-30	Jan	2030	\$4.51	\$7.91	\$6.51	\$7.91
50	Feb-30	Feb	2030	\$4.22	\$6.77	\$5.58	\$6.77

[Link-to-previous setting changed from on in original to off in modified.].

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Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
51	Mar-20	Mar	2020	\$3.50	\$3.45	\$2.80	\$3.45
52	Apr-20	Apr	2020	\$1.95	\$1.98	\$2.30	\$1.98
53	May-20	May	2020	\$2.07	\$2.41	\$2.45	\$2.43
54	Jun-20	Jun	2020	\$2.25	\$2.57	\$2.29	\$2.57
55	Jul-20	Jul	2020	\$2.38	\$2.75	\$2.38	\$2.75
56	Aug-20	Aug	2020	\$2.42	\$2.69	\$2.26	\$2.69
57	Sep-20	Sep	2020	\$2.60	\$2.60	\$2.18	\$2.60
58	Oct-20	Oct	2020	\$2.66	\$2.29	\$2.02	\$2.29
59	Nov-20	Nov	2020	\$2.67	\$2.18	\$2.73	\$2.18
60	Dec-20	Dec	2020	\$4.05	\$5.04	\$4.22	\$5.04
61	Jan-21	Jan	2021	\$4.32	\$7.70	\$6.06	\$7.65
62	Feb-21	Feb	2021	\$4.24	\$4.65	\$6.08	\$6.54
63	Mar-21	Mar	2021	\$3.42	\$3.29	\$3.04	\$3.29
64	Apr-21	Apr	2021	\$2.85	\$2.51	\$2.44	\$2.51
65	May-21	May	2021	\$2.54	\$2.29	\$2.29	\$2.29
66	Jun-21	Jun	2021	\$2.88	\$2.42	\$2.36	\$2.42
67	Jul-21	Jul	2021	\$3.24	\$2.68	\$2.59	\$2.58
68	Aug-21	Aug	2021	\$3.21	\$2.57	\$2.68	\$2.58
69	Sep-21	Sep	2021	\$3.26	\$2.26	\$2.22	\$2.26
70	Oct-21	Oct	2021	\$3.34	\$2.14	\$2.51	\$2.14
71	Nov-21	Nov	2021	\$3.54	\$1.94	\$2.88	\$1.94
72	Dec-21	Dec	2021	\$3.87	\$4.92	\$4.45	\$4.92
73	Jan-22	Jan	2022	\$4.26	\$7.78	\$7.67	\$7.61
74	Feb-22	Feb	2022	\$3.85	\$6.41	\$4.74	\$6.41
75	Mar-22	Mar	2022	\$2.29	\$3.16	\$3.01	\$3.29
76	Apr-22	Apr	2022	\$2.83	\$2.48	\$2.88	\$2.51
77	May-22	May	2022	\$2.82	\$2.16	\$2.57	\$2.28
78	Jun-22	Jun	2022	\$2.87	\$2.26	\$2.71	\$2.42
79	Jul-22	Jul	2022	\$3.04	\$2.44	\$2.87	\$2.50
80	Aug-22	Aug	2022	\$3.21	\$2.45	\$2.64	\$2.56
81	Sep-22	Sep	2022	\$3.18	\$2.14	\$2.58	\$2.26
82	Oct-22	Oct	2022	\$3.28	\$2.03	\$2.44	\$2.15
83	Nov-22	Nov	2022	\$2.49	\$2.08	\$2.30	\$2.07
84	Dec-22	Dec	2022	\$3.82	\$4.88	\$5.81	\$4.88
85	Jan-23	Jan	2023	\$4.57	\$7.77	\$8.88	\$8.18
86	Feb-23	Feb	2023	\$2.89	\$4.45	\$2.42	\$4.37
87	Mar-23	Mar	2023	\$3.28	\$3.14	\$3.87	\$3.45
88	Apr-23	Apr	2023	\$2.82	\$2.28	\$3.05	\$2.59
89	May-23	May	2023	\$2.88	\$2.18	\$2.82	\$2.47
90	Jun-23	Jun	2023	\$2.88	\$2.22	\$2.88	\$2.81
91	Jul-23	Jul	2023	\$3.17	\$2.58	\$3.07	\$2.79
92	Aug-23	Aug	2023	\$3.22	\$2.45	\$3.02	\$2.74
93	Sep-23	Sep	2023	\$3.29	\$2.14	\$2.82	\$2.42
94	Oct-23	Oct	2023	\$3.24	\$2.08	\$2.64	\$2.29
95	Nov-23	Nov	2023	\$3.55	\$2.08	\$2.44	\$2.28
96	Dec-23	Dec	2023	\$2.88	\$4.31	\$5.42	\$5.22
97	Jan-24	Jan	2024	\$4.18	\$7.24	\$8.14	\$8.58
98	Feb-24	Feb	2024	\$3.82	\$6.49	\$7.82	\$7.34
99	Mar-24	Mar	2024	\$3.32	\$3.16	\$4.07	\$3.69
100	Apr-24	Apr	2024	\$2.52	\$2.47	\$3.28	\$2.81

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	NYMEX Heavy Hob Natural Gas Price (Nominal \$/MMBTU)	NYMEX PECO Natural Gas Price (Nominal \$/MMBTU)	ESA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
101	May	May	2004	\$2.25	\$2.25	\$2.35	\$2.55
102	Jun	Jun	2004	\$1.95	\$1.95	\$1.94	\$2.52
103	Jul	Jul	2004	\$1.22	\$1.25	\$1.34	\$2.00
104	Aug	Aug	2004	\$1.25	\$2.47	\$1.35	\$2.59
105	Sep	Sep	2004	\$1.25	\$2.25	\$2.37	\$2.54
106	Oct	Oct	2004	\$1.11	\$2.05	\$2.34	\$2.50
107	Nov	Nov	2004	\$1.57	\$1.01	\$1.81	\$2.45
108	Dec	Dec	2004	\$1.97	\$4.95	\$5.31	\$5.51
109	Jan	Jan	2005	\$4.55	\$7.94	\$5.81	\$5.55
110	Feb	Feb	2005	\$1.35	\$5.77	\$5.25	\$7.43
111	Mar	Mar	2005	\$1.52	\$1.37	\$4.15	\$1.56
112	Apr	Apr	2005	\$1.35	\$2.71	\$1.25	\$2.17
113	May	May	2005	\$1.15	\$2.47	\$1.07	\$2.30
114	Jun	Jun	2005	\$1.25	\$2.50	\$1.24	\$2.01
115	Jul	Jul	2005	\$1.14	\$1.95	\$1.44	\$1.55
116	Aug	Aug	2005	\$1.25	\$2.47	\$1.25	\$2.01
117	Sep	Sep	2005	\$1.25	\$2.15	\$1.05	\$2.01
118	Oct	Oct	2005	\$1.14	\$2.04	\$1.52	\$2.67
119	Nov	Nov	2005	\$1.54	\$1.00	\$1.58	\$1.67
120	Dec	Dec	2005	\$1.94	\$4.95	\$5.31	\$5.75
121	Jan	Jan	2006	\$4.51	\$5.34	\$5.54	\$5.24
122	Feb	Feb	2006	\$4.24	\$7.12	\$4.95	\$5.01
123	Mar	Mar	2006	\$1.61	\$2.40	\$4.25	\$4.14
124	Apr	Apr	2006	\$1.21	\$2.74	\$1.40	\$2.71
125	May	May	2006	\$1.21	\$1.55	\$1.12	\$1.01
126	Jun	Jun	2006	\$1.25	\$2.54	\$1.25	\$2.55
127	Jul	Jul	2006	\$1.55	\$2.75	\$1.41	\$1.25
128	Aug	Aug	2006	\$1.54	\$2.74	\$1.44	\$1.24
129	Sep	Sep	2006	\$1.54	\$2.41	\$1.51	\$1.00
130	Oct	Oct	2006	\$1.65	\$2.21	\$2.35	\$2.67
131	Nov	Nov	2006	\$1.01	\$1.21	\$4.95	\$1.55
132	Dec	Dec	2006	\$4.25	\$5.12	\$5.15	\$5.05
133	Jan	Jan	2007	\$4.44	\$5.25	\$5.49	\$5.49
134	Feb	Feb	2007	\$4.55	\$7.05	\$4.11	\$4.11
135	Mar	Mar	2007	\$1.55	\$1.40	\$4.21	\$4.21
136	Apr	Apr	2007	\$1.15	\$1.40	\$1.25	\$1.25
137	May	May	2007	\$1.14	\$2.41	\$1.15	\$1.15
138	Jun	Jun	2007	\$1.25	\$2.15	\$1.24	\$1.25
139	Jul	Jul	2007	\$1.41	\$1.71	\$1.40	\$1.40
140	Aug	Aug	2007	\$1.41	\$2.01	\$1.41	\$2.41
141	Sep	Sep	2007	\$1.41	\$1.11	\$1.05	\$1.15
142	Oct	Oct	2007	\$1.51	\$1.15	\$1.35	\$1.35
143	Nov	Nov	2007	\$1.24	\$1.15	\$1.35	\$1.35
144	Dec	Dec	2007	\$4.11	\$5.25	\$4.15	\$4.15
145	Jan	Jan	2008			\$5.21	\$5.21
146	Feb	Feb	2008			\$7.35	\$7.35
147	Mar	Mar	2008			\$4.14	\$4.14
148	Apr	Apr	2008			\$1.21	\$1.21
149	May	May	2008			\$1.01	\$1.01
150	Jun	Jun	2008			\$1.15	\$1.15

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
151	Jul-38	Jul	2038			\$3.39	\$3.39
152	Aug-38	Aug	2038			\$3.35	\$3.35
153	Sep-38	Sep	2038			\$3.02	\$3.02
154	Oct-38	Oct	2038			\$2.88	\$2.88
155	Nov-38	Nov	2038			\$3.89	\$3.89
156	Dec-38	Dec	2038			\$6.02	\$6.02
157	Jan-39	Jan	2039			\$9.14	\$9.14
158	Feb-39	Feb	2039			\$7.83	\$7.83
159	Mar-39	Mar	2039			\$4.07	\$4.07
160	Apr-39	Apr	2039			\$3.25	\$3.25
161	May-39	May	2039			\$2.98	\$2.98
162	Jun-39	Jun	2039			\$3.14	\$3.14
163	Jul-39	Jul	2039			\$3.34	\$3.34
164	Aug-39	Aug	2039			\$3.30	\$3.30
165	Sep-39	Sep	2039			\$2.97	\$2.97
166	Oct-39	Oct	2039			\$2.84	\$2.84
167	Nov-39	Nov	2039			\$3.83	\$3.83
168	Dec-39	Dec	2039			\$5.92	\$5.92
169	Jan-40	Jan	2040			\$9.20	\$9.20
170	Feb-40	Feb	2040			\$7.88	\$7.88
171	Mar-40	Mar	2040			\$4.10	\$4.10
172	Apr-40	Apr	2040			\$3.28	\$3.28
173	May-40	May	2040			\$3.00	\$3.00
174	Jun-40	Jun	2040			\$3.16	\$3.16
175	Jul-40	Jul	2040			\$3.36	\$3.36
176	Aug-40	Aug	2040			\$3.32	\$3.32
177	Sep-40	Sep	2040			\$2.99	\$2.99
178	Oct-40	Oct	2040			\$2.86	\$2.86
179	Nov-40	Nov	2040			\$3.86	\$3.86
180	Dec-40	Dec	2040			\$5.96	\$5.96
181	Jan-41	Jan	2041			\$9.49	\$9.49
182	Feb-41	Feb	2041			\$8.13	\$8.13
183	Mar-41	Mar	2041			\$4.23	\$4.23
184	Apr-41	Apr	2041			\$3.38	\$3.38
185	May-41	May	2041			\$3.10	\$3.10
186	Jun-41	Jun	2041			\$3.26	\$3.26
187	Jul-41	Jul	2041			\$3.47	\$3.47
188	Aug-41	Aug	2041			\$3.42	\$3.42
189	Sep-41	Sep	2041			\$3.08	\$3.08
190	Oct-41	Oct	2041			\$2.95	\$2.95
191	Nov-41	Nov	2041			\$3.98	\$3.98
192	Dec-41	Dec	2041			\$6.15	\$6.15
193	Jan-42	Jan	2042			\$9.82	\$9.82
194	Feb-42	Feb	2042			\$8.41	\$8.41
195	Mar-42	Mar	2042			\$4.37	\$4.37
196	Apr-42	Apr	2042			\$3.50	\$3.50
197	May-42	May	2042			\$3.21	\$3.21
198	Jun-42	Jun	2042			\$3.38	\$3.38
199	Jul-42	Jul	2042			\$3.59	\$3.59
200	Aug-42	Aug	2042			\$3.54	\$3.54

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
201	Sep-42	Sep	2042			\$3.19	\$3.19
202	Oct-42	Oct	2042			\$3.05	\$3.05
203	Nov-42	Nov	2042			\$4.11	\$4.11
204	Dec-42	Dec	2042			\$6.37	\$6.37
205	Jan-43	Jan	2043			\$10.15	\$10.15
206	Feb-43	Feb	2043			\$8.70	\$8.70
207	Mar-43	Mar	2043			\$4.52	\$4.52
208	Apr-43	Apr	2043			\$3.62	\$3.62
209	May-43	May	2043			\$3.32	\$3.32
210	Jun-43	Jun	2043			\$3.49	\$3.49
211	Jul-43	Jul	2043			\$3.71	\$3.71
212	Aug-43	Aug	2043			\$3.66	\$3.66
213	Sep-43	Sep	2043			\$3.30	\$3.30
214	Oct-43	Oct	2043			\$3.15	\$3.15
215	Nov-43	Nov	2043			\$4.26	\$4.26
216	Dec-43	Dec	2043			\$6.58	\$6.58
217	Jan-44	Jan	2044			\$10.37	\$10.37
218	Feb-44	Feb	2044			\$8.88	\$8.88
219	Mar-44	Mar	2044			\$4.62	\$4.62
220	Apr-44	Apr	2044			\$3.69	\$3.69
221	May-44	May	2044			\$3.39	\$3.39
222	Jun-44	Jun	2044			\$3.56	\$3.56
223	Jul-44	Jul	2044			\$3.79	\$3.79
224	Aug-44	Aug	2044			\$3.74	\$3.74
225	Sep-44	Sep	2044			\$3.37	\$3.37
226	Oct-44	Oct	2044			\$3.22	\$3.22
227	Nov-44	Nov	2044			\$4.34	\$4.34
228	Dec-44	Dec	2044			\$6.72	\$6.72
229	Jan-45	Jan	2045			\$10.52	\$10.52
230	Feb-45	Feb	2045			\$9.01	\$9.01
231	Mar-45	Mar	2045			\$4.69	\$4.69
232	Apr-45	Apr	2045			\$3.75	\$3.75
233	May-45	May	2045			\$3.44	\$3.44
234	Jun-45	Jun	2045			\$3.62	\$3.62
235	Jul-45	Jul	2045			\$3.84	\$3.84
236	Aug-45	Aug	2045			\$3.79	\$3.79
237	Sep-45	Sep	2045			\$3.42	\$3.42
238	Oct-45	Oct	2045			\$3.27	\$3.27
239	Nov-45	Nov	2045			\$4.41	\$4.41
240	Dec-45	Dec	2045			\$6.82	\$6.82
241	Jan-46	Jan	2046			\$0.00	\$0.00
242	Feb-46	Feb	2046			\$0.00	\$0.00
243	Mar-46	Mar	2046			\$0.00	\$0.00
244	Apr-46	Apr	2046			\$0.00	\$0.00
245	May-46	May	2046			\$0.00	\$0.00
246	Jun-46	Jun	2046			\$0.00	\$0.00
247	Jul-46	Jul	2046			\$0.00	\$0.00
248	Aug-46	Aug	2046			\$0.00	\$0.00
249	Sep-46	Sep	2046			\$0.00	\$0.00
250	Oct-46	Oct	2046			\$0.00	\$0.00

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
251	Nov-46	Nov	2046			\$0.00	\$0.00
252	Dec-46	Dec	2046			\$0.00	\$0.00
253	Jan-47	Jan	2047			\$0.00	\$0.00
254	Feb-47	Feb	2047			\$0.00	\$0.00
255	Mar-47	Mar	2047			\$0.00	\$0.00
256	Apr-47	Apr	2047			\$0.00	\$0.00
257	May-47	May	2047			\$0.00	\$0.00
258	Jun-47	Jun	2047			\$0.00	\$0.00
259	Jul-47	Jul	2047			\$0.00	\$0.00
260	Aug-47	Aug	2047			\$0.00	\$0.00
261	Sep-47	Sep	2047			\$0.00	\$0.00
262	Oct-47	Oct	2047			\$0.00	\$0.00
263	Nov-47	Nov	2047			\$0.00	\$0.00
264	Dec-47	Dec	2047			\$0.00	\$0.00

[Link-to-previous setting changed from on in original to off in modified.].

Avoided AC

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
1	Jan-26	Jan	2026	Winter	\$73.22	\$59.28	\$59.93	\$57.88	\$30.70	\$158	\$73.22	\$59.28
2	Feb-26	Feb	2026	Winter	\$64.41	\$55.46	\$72.27	\$49.77	\$7.06	\$5.63	\$64.41	\$55.46
3	Mar-26	Mar	2026	Shoulder	\$47.8	\$42.07	\$38.29	\$27.06	\$7.09	\$5.01	\$47.8	\$42.07
4	Apr-26	Apr	2026	Shoulder	\$45.8	\$34.29	\$35.28	\$24.24	\$3.96	\$5.04	\$45.8	\$34.29
5	May-26	May	2026	Summer	\$49.77	\$33.96	\$32.52	\$22.81	\$6.64	\$5.12	\$49.77	\$33.96
6	Jun-26	Jun	2026	Summer	\$51.06	\$32.05	\$34.88	\$24.02	\$6.8	\$5.83	\$51.06	\$32.05
7	Jul-26	Jul	2026	Summer	\$59.75	\$39.75	\$37.01	\$26.49	\$32.74	\$12.88	\$59.75	\$39.75
8	Aug-26	Aug	2026	Summer	\$61.87	\$36.77	\$36.95	\$26.17	\$25.32	\$15.93	\$61.87	\$36.77
9	Sep-26	Sep	2026	Summer	\$52.21	\$32.41	\$32.23	\$22.99	\$6.96	\$5.52	\$52.21	\$32.41
10	Oct-26	Oct	2026	Shoulder	\$47.8	\$34.6	\$31.81	\$21.91	\$6.37	\$5.19	\$47.8	\$34.6
11	Nov-26	Nov	2026	Shoulder	\$56.57	\$40.62	\$41.52	\$28.59	\$3.05	\$1.42	\$56.57	\$40.62
12	Dec-26	Dec	2026	Winter	\$62.22	\$52.44	\$63.79	\$42.49	\$0.53	\$3.95	\$62.22	\$52.44
13	Jan-27	Jan	2027	Winter	\$62.86	\$58.11	\$60.05	\$42.57	\$3.19	\$5.54	\$62.86	\$58.11
14	Feb-27	Feb	2027	Winter	\$72.82	\$62.18	\$78.15	\$52.82	\$5.23	\$5.27	\$72.82	\$62.18
15	Mar-27	Mar	2027	Shoulder	\$54.82	\$45.8	\$41.78	\$28.77	\$3.85	\$5.41	\$54.82	\$45.8
16	Apr-27	Apr	2027	Shoulder	\$49.41	\$36.23	\$34.24	\$22.68	\$5.67	\$5.68	\$49.41	\$36.23
17	May-27	May	2027	Summer	\$56.57	\$35.48	\$36.62	\$23.77	\$6.96	\$13.71	\$56.57	\$35.48
18	Jun-27	Jun	2027	Summer	\$51.96	\$34.36	\$32.85	\$22.79	\$6.99	\$16.17	\$51.96	\$34.36
19	Jul-27	Jul	2027	Summer	\$71.04	\$49.06	\$44.75	\$23.95	\$26.25	\$18.31	\$71.04	\$49.06
20	Aug-27	Aug	2027	Summer	\$82.85	\$37.85	\$34.37	\$23.67	\$28.44	\$14.21	\$82.85	\$37.85
21	Sep-27	Sep	2027	Summer	\$83.8	\$34.63	\$31.09	\$21.41	\$22.01	\$15.22	\$83.8	\$34.63
22	Oct-27	Oct	2027	Shoulder	\$48.03	\$35.48	\$33.86	\$20.96	\$18.17	\$14.31	\$48.03	\$35.48
23	Nov-27	Nov	2027	Shoulder	\$51.95	\$41.22	\$39.47	\$27.8	\$5.08	\$14.04	\$51.95	\$41.22
24	Dec-27	Dec	2027	Winter	\$63.26	\$54.65	\$59.69	\$41.84	\$3.79	\$3.62	\$63.26	\$54.65
25	Jan-28	Jan	2028	Winter	\$66.26	\$71.05	\$69.23	\$61.49	\$2.97	\$3.49	\$66.26	\$71.05
26	Feb-28	Feb	2028	Winter	\$75.35	\$65.79	\$75.9	\$62.29	\$0.67	\$2.39	\$75.35	\$65.79
27	Mar-28	Mar	2028	Shoulder	\$67.29	\$47.94	\$39.95	\$27.51	\$17.34	\$26.43	\$67.29	\$47.94
28	Apr-28	Apr	2028	Shoulder	\$61.95	\$38.84	\$32.8	\$23.30	\$18.45	\$16.55	\$61.95	\$38.84
29	May-28	May	2028	Summer	\$62.84	\$37.57	\$35.52	\$26.34	\$23.37	\$17.23	\$62.84	\$37.57
30	Jun-28	Jun	2028	Summer	\$74.25	\$36.93	\$38.96	\$21.34	\$22.28	\$15.9	\$74.25	\$36.93
31	Jul-28	Jul	2028	Summer	\$74.29	\$43.36	\$32.91	\$22.68	\$41.30	\$29.69	\$74.29	\$43.36
32	Aug-28	Aug	2028	Summer	\$85.75	\$49.20	\$32.46	\$22.38	\$25.24	\$17.84	\$85.75	\$49.20
33	Sep-28	Sep	2028	Summer	\$85.46	\$36.86	\$28.31	\$20.98	\$26.9	\$16.67	\$85.46	\$36.86
34	Oct-28	Oct	2028	Shoulder	\$60.17	\$37.57	\$37.86	\$19.27	\$22.9	\$16.39	\$60.17	\$37.57
35	Nov-28	Nov	2028	Shoulder	\$53.73	\$42.67	\$37.47	\$25.81	\$16.25	\$17.08	\$53.73	\$42.67
36	Dec-28	Dec	2028	Winter	\$66.9	\$58.00	\$57.72	\$39.78	\$3.38	\$16.25	\$66.9	\$58.00
37	Jan-29	Jan	2029	Winter	\$85.24	\$74.07	\$87.25	\$69.89	\$2.89	\$3.89	\$85.24	\$74.07
38	Feb-29	Feb	2029	Winter	\$78.66	\$67.66	\$74.96	\$51.62	\$3.69	\$10.04	\$78.66	\$67.66
39	Mar-29	Mar	2029	Shoulder	\$59.29	\$49.37	\$38.21	\$26.37	\$21.08	\$23.05	\$59.29	\$49.37
40	Apr-29	Apr	2029	Shoulder	\$52.46	\$39.75	\$36.34	\$26.80	\$23.12	\$16.85	\$52.46	\$39.75
41	May-29	May	2029	Summer	\$54.66	\$36.77	\$37.81	\$19.8	\$26.95	\$18.62	\$54.66	\$36.77
42	Jun-29	Jun	2029	Summer	\$56.8	\$27.81	\$29.56	\$26.37	\$26.93	\$17.24	\$56.8	\$27.81
43	Jul-29	Jul	2029	Summer	\$78.83	\$44.03	\$31.67	\$23.81	\$49.9	\$22.83	\$78.83	\$44.03
44	Aug-29	Aug	2029	Summer	\$67.81	\$41.60	\$31.35	\$21.59	\$38.58	\$18.81	\$67.81	\$41.60
45	Sep-29	Sep	2029	Summer	\$67.82	\$37.97	\$28.27	\$19.47	\$28.9	\$16.50	\$67.82	\$37.97
46	Oct-29	Oct	2029	Shoulder	\$51.86	\$36.77	\$37.07	\$16.84	\$14.79	\$20.12	\$51.86	\$36.77
47	Nov-29	Nov	2029	Shoulder	\$55.69	\$44.9	\$36.57	\$25.48	\$19.32	\$16.37	\$55.69	\$44.9
48	Dec-29	Dec	2029	Winter	\$66.37	\$58.78	\$57.08	\$39.28	\$1.78	\$20.53	\$66.37	\$58.78
49	Jan-30	Jan	2030	Winter	\$77.53	\$53.84	\$67.20	\$66.05	\$8.57	\$6.58	\$77.53	\$53.84
50	Feb-30	Feb	2030	Winter	\$68.50	\$45.00	\$74.75	\$51.44	\$8.29	\$5.64	\$68.50	\$45.00

[Link-to-previous setting changed from on in original to off in modified.]

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
51	Mar-30	Mar	2030	Shoulder	\$23.88	\$23.33	\$38.06	\$26.21	\$4.18	\$2.88	\$32.88	\$23.33
52	Apr-30	Apr	2030	Shoulder	\$26.35	\$18.14	\$29.59	\$20.38	\$3.25	\$2.24	\$26.35	\$18.14
53	May-30	May	2030	Summer	\$23.91	\$16.47	\$26.96	\$19.50	\$2.95	\$2.03	\$23.91	\$16.47
54	Jun-30	Jun	2030	Summer	\$25.28	\$17.41	\$28.40	\$19.56	\$3.12	\$2.15	\$25.28	\$17.41
55	Jul-30	Jul	2030	Summer	\$26.84	\$18.48	\$30.15	\$20.76	\$3.31	\$2.28	\$26.84	\$18.48
56	Aug-30	Aug	2030	Summer	\$26.46	\$18.22	\$29.72	\$20.47	\$3.26	\$2.25	\$26.46	\$18.22
57	Sep-30	Sep	2030	Summer	\$23.55	\$16.22	\$26.46	\$19.22	\$2.90	\$2.00	\$23.55	\$16.22
58	Oct-30	Oct	2030	Shoulder	\$22.42	\$15.44	\$25.18	\$17.34	\$2.76	\$1.90	\$22.42	\$15.44
59	Nov-30	Nov	2030	Shoulder	\$31.24	\$21.52	\$35.10	\$24.17	\$3.85	\$2.65	\$31.24	\$21.52
60	Dec-30	Dec	2030	Winter	\$49.46	\$34.06	\$55.56	\$38.26	\$6.10	\$4.20	\$49.46	\$34.06
61	Jan-31	Jan	2031	Winter	\$0.00	\$0.00	\$84.41	\$58.13	\$4.55	\$3.55	\$79.86	\$54.03
62	Feb-31	Feb	2031	Winter	\$0.00	\$0.00	\$72.12	\$49.67	\$2.49	\$0.20	\$69.72	\$57.97
63	Mar-31	Mar	2031	Shoulder	\$0.00	\$0.00	\$35.90	\$24.72	\$12.09	\$11.55	\$48.00	\$39.27
64	Apr-31	Apr	2031	Shoulder	\$0.00	\$0.00	\$27.74	\$19.10	\$13.90	\$11.63	\$41.64	\$30.78
65	May-31	May	2031	Summer	\$0.00	\$0.00	\$25.18	\$17.24	\$16.88	\$12.38	\$42.07	\$29.73
66	Jun-31	Jun	2031	Summer	\$0.00	\$0.00	\$26.73	\$18.41	\$16.78	\$10.70	\$43.51	\$29.11
67	Jul-31	Jul	2031	Summer	\$0.00	\$0.00	\$28.54	\$19.65	\$30.47	\$14.84	\$59.01	\$34.49
68	Aug-31	Aug	2031	Summer	\$0.00	\$0.00	\$28.17	\$19.40	\$24.25	\$12.66	\$52.42	\$32.06
69	Sep-31	Sep	2031	Summer	\$0.00	\$0.00	\$24.91	\$17.16	\$18.99	\$11.94	\$43.90	\$28.99
70	Oct-31	Oct	2031	Shoulder	\$0.00	\$0.00	\$23.89	\$16.25	\$15.32	\$13.13	\$39.51	\$29.37
71	Nov-31	Nov	2031	Shoulder	\$0.00	\$0.00	\$33.25	\$22.90	\$11.10	\$12.10	\$44.38	\$35.00
72	Dec-31	Dec	2031	Winter	\$0.00	\$0.00	\$53.85	\$36.95	\$4.43	\$12.30	\$58.08	\$48.24
73	Jan-32	Jan	2032	Winter	\$0.00	\$0.00	\$86.21	\$59.37	\$4.55	\$3.55	\$81.66	\$55.32
74	Feb-32	Feb	2032	Winter	\$0.00	\$0.00	\$73.30	\$50.48	\$2.40	\$0.20	\$70.90	\$58.68
75	Mar-32	Mar	2032	Shoulder	\$0.00	\$0.00	\$35.92	\$24.74	\$12.09	\$11.55	\$48.01	\$39.28
76	Apr-32	Apr	2032	Shoulder	\$0.00	\$0.00	\$27.75	\$19.11	\$13.90	\$11.63	\$41.66	\$30.80
77	May-32	May	2032	Summer	\$0.00	\$0.00	\$25.11	\$17.29	\$16.88	\$12.38	\$41.99	\$29.67
78	Jun-32	Jun	2032	Summer	\$0.00	\$0.00	\$26.74	\$18.42	\$16.78	\$10.70	\$43.52	\$29.12
79	Jul-32	Jul	2032	Summer	\$0.00	\$0.00	\$28.67	\$19.74	\$30.47	\$14.84	\$59.14	\$34.58
80	Aug-32	Aug	2032	Summer	\$0.00	\$0.00	\$28.23	\$19.44	\$24.25	\$12.66	\$52.48	\$32.10
81	Sep-32	Sep	2032	Summer	\$0.00	\$0.00	\$24.95	\$17.18	\$18.99	\$11.94	\$43.94	\$29.02
82	Oct-32	Oct	2032	Shoulder	\$0.00	\$0.00	\$23.71	\$16.33	\$15.32	\$13.13	\$39.62	\$29.45
83	Nov-32	Nov	2032	Shoulder	\$0.00	\$0.00	\$33.84	\$23.31	\$11.10	\$12.10	\$44.97	\$35.41
84	Dec-32	Dec	2032	Winter	\$0.00	\$0.00	\$54.70	\$37.67	\$4.43	\$12.30	\$59.12	\$48.97
85	Jan-33	Jan	2033	Winter	\$0.00	\$0.00	\$80.02	\$61.99	\$4.55	\$3.55	\$75.47	\$57.95
86	Feb-33	Feb	2033	Winter	\$0.00	\$0.00	\$76.83	\$52.91	\$2.40	\$0.20	\$74.43	\$61.12
87	Mar-33	Mar	2033	Shoulder	\$0.00	\$0.00	\$38.09	\$26.23	\$12.09	\$11.55	\$50.18	\$40.78
88	Apr-33	Apr	2033	Shoulder	\$0.00	\$0.00	\$28.69	\$20.44	\$13.90	\$11.63	\$43.59	\$32.10
89	May-33	May	2033	Summer	\$0.00	\$0.00	\$27.20	\$19.73	\$16.88	\$12.38	\$44.09	\$31.12
90	Jun-33	Jun	2033	Summer	\$0.00	\$0.00	\$28.79	\$19.83	\$16.78	\$10.70	\$45.57	\$30.53
91	Jul-33	Jul	2033	Summer	\$0.00	\$0.00	\$30.76	\$21.18	\$30.47	\$14.84	\$61.23	\$36.02
92	Aug-33	Aug	2033	Summer	\$0.00	\$0.00	\$30.23	\$20.82	\$24.25	\$12.66	\$54.48	\$33.48
93	Sep-33	Sep	2033	Summer	\$0.00	\$0.00	\$26.81	\$19.46	\$18.99	\$11.94	\$45.90	\$30.30
94	Oct-33	Oct	2033	Shoulder	\$0.00	\$0.00	\$25.31	\$17.43	\$15.32	\$13.13	\$41.23	\$30.56
95	Nov-33	Nov	2033	Shoulder	\$0.00	\$0.00	\$36.00	\$24.79	\$11.10	\$12.10	\$47.12	\$36.89
96	Dec-33	Dec	2033	Winter	\$0.00	\$0.00	\$57.53	\$39.62	\$4.43	\$12.30	\$61.96	\$51.92
97	Jan-34	Jan	2034	Winter	\$0.00	\$0.00	\$84.68	\$65.20	\$4.55	\$3.55	\$80.13	\$71.16
98	Feb-34	Feb	2034	Winter	\$0.00	\$0.00	\$80.97	\$55.76	\$2.40	\$0.20	\$78.57	\$63.97
99	Mar-34	Mar	2034	Shoulder	\$0.00	\$0.00	\$40.70	\$28.03	\$12.09	\$11.55	\$52.79	\$42.59
100	Apr-34	Apr	2034	Shoulder	\$0.00	\$0.00	\$32.20	\$22.18	\$13.90	\$11.63	\$46.11	\$33.87

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
101	May-24	May	2024	Summer	\$0.00	\$0.00	\$29.52	\$20.25	\$6.88	\$12.38	\$46.41	\$32.72
102	Jun-24	Jun	2024	Summer	\$0.00	\$0.00	\$31.2	\$21.43	\$6.78	\$10.70	\$47.80	\$32.10
103	Jul-24	Jul	2024	Summer	\$0.00	\$0.00	\$33.06	\$22.78	\$30.47	\$14.84	\$63.55	\$37.62
104	Aug-24	Aug	2024	Summer	\$0.00	\$0.00	\$32.49	\$22.37	\$24.25	\$12.66	\$56.73	\$35.03
105	Sep-24	Sep	2024	Summer	\$0.00	\$0.00	\$28.11	\$20.05	\$18.99	\$11.84	\$48.10	\$31.89
106	Oct-24	Oct	2024	Shoulder	\$0.00	\$0.00	\$27.59	\$19.00	\$15.82	\$13.13	\$43.50	\$32.12
107	Nov-24	Nov	2024	Shoulder	\$0.00	\$0.00	\$26.49	\$26.51	\$11.13	\$12.10	\$49.62	\$38.61
108	Dec-24	Dec	2024	Winter	\$0.00	\$0.00	\$60.94	\$41.97	\$4.43	\$12.30	\$65.37	\$54.27
109	Jan-25	Jan	2025	Winter	\$0.00	\$0.00	\$39.17	\$68.30	\$4.55	\$5.95	\$44.62	\$74.25
110	Feb-25	Feb	2025	Winter	\$0.00	\$0.00	\$84.05	\$58.44	\$2.40	\$8.20	\$82.45	\$66.64
111	Mar-25	Mar	2025	Shoulder	\$0.00	\$0.00	\$43.67	\$30.07	\$12.09	\$14.55	\$55.76	\$44.62
112	Apr-25	Apr	2025	Shoulder	\$0.00	\$0.00	\$35.01	\$24.11	\$13.90	\$11.69	\$48.91	\$35.80
113	May-25	May	2025	Summer	\$0.00	\$0.00	\$31.99	\$22.03	\$6.88	\$12.38	\$48.87	\$34.41
114	Jun-25	Jun	2025	Summer	\$0.00	\$0.00	\$33.37	\$22.98	\$6.78	\$10.70	\$50.15	\$33.68
115	Jul-25	Jul	2025	Summer	\$0.00	\$0.00	\$35.11	\$24.18	\$30.47	\$14.84	\$65.58	\$39.02
116	Aug-25	Aug	2025	Summer	\$0.00	\$0.00	\$34.54	\$23.79	\$24.25	\$12.66	\$58.79	\$36.45
117	Sep-25	Sep	2025	Summer	\$0.00	\$0.00	\$30.98	\$21.94	\$18.99	\$11.84	\$49.97	\$33.18
118	Oct-25	Oct	2025	Shoulder	\$0.00	\$0.00	\$29.45	\$20.28	\$15.82	\$13.13	\$45.37	\$33.41
119	Nov-25	Nov	2025	Shoulder	\$0.00	\$0.00	\$40.52	\$27.91	\$11.13	\$12.10	\$51.65	\$40.01
120	Dec-25	Dec	2025	Winter	\$0.00	\$0.00	\$63.78	\$43.93	\$4.43	\$12.30	\$68.21	\$56.22
121	Jan-26	Jan	2026	Winter	\$0.00	\$0.00	\$30.41	\$71.22	\$4.55	\$5.95	\$38.86	\$77.17
122	Feb-26	Feb	2026	Winter	\$0.00	\$0.00	\$88.53	\$60.96	\$2.40	\$8.20	\$86.13	\$69.17
123	Mar-26	Mar	2026	Shoulder	\$0.00	\$0.00	\$45.70	\$31.47	\$12.09	\$14.55	\$57.79	\$44.02
124	Apr-26	Apr	2026	Shoulder	\$0.00	\$0.00	\$36.46	\$25.11	\$13.90	\$11.69	\$50.37	\$36.80
125	May-26	May	2026	Summer	\$0.00	\$0.00	\$33.41	\$23.01	\$6.88	\$12.38	\$50.29	\$35.39
126	Jun-26	Jun	2026	Summer	\$0.00	\$0.00	\$35.10	\$24.23	\$6.78	\$10.70	\$51.96	\$34.93
127	Jul-26	Jul	2026	Summer	\$0.00	\$0.00	\$37.36	\$25.73	\$30.47	\$14.84	\$67.83	\$40.57
128	Aug-26	Aug	2026	Summer	\$0.00	\$0.00	\$36.87	\$25.39	\$24.25	\$12.66	\$61.12	\$38.05
129	Sep-26	Sep	2026	Summer	\$0.00	\$0.00	\$33.11	\$22.80	\$18.99	\$11.84	\$52.10	\$34.64
130	Oct-26	Oct	2026	Shoulder	\$0.00	\$0.00	\$31.60	\$21.76	\$15.82	\$13.13	\$47.52	\$34.89
131	Nov-26	Nov	2026	Shoulder	\$0.00	\$0.00	\$42.97	\$29.59	\$11.13	\$12.10	\$54.09	\$41.69
132	Dec-26	Dec	2026	Winter	\$0.00	\$0.00	\$66.88	\$46.06	\$4.43	\$12.30	\$71.31	\$58.36
133	Jan-27	Jan	2027	Winter	\$0.00	\$0.00	\$304.63	\$72.05	\$4.55	\$5.95	\$308.08	\$78.01
134	Feb-27	Feb	2027	Winter	\$0.00	\$0.00	\$99.63	\$61.73	\$2.40	\$8.20	\$102.23	\$69.93
135	Mar-27	Mar	2027	Shoulder	\$0.00	\$0.00	\$46.62	\$32.11	\$12.09	\$14.55	\$58.72	\$46.66
136	Apr-27	Apr	2027	Shoulder	\$0.00	\$0.00	\$37.26	\$25.68	\$13.90	\$11.69	\$51.16	\$37.35
137	May-27	May	2027	Summer	\$0.00	\$0.00	\$34.17	\$23.53	\$6.88	\$12.38	\$51.06	\$35.92
138	Jun-27	Jun	2027	Summer	\$0.00	\$0.00	\$35.97	\$24.77	\$6.78	\$10.70	\$52.75	\$35.47
139	Jul-27	Jul	2027	Summer	\$0.00	\$0.00	\$38.22	\$26.32	\$30.47	\$14.84	\$68.69	\$41.16
140	Aug-27	Aug	2027	Summer	\$0.00	\$0.00	\$37.74	\$25.99	\$24.25	\$12.66	\$61.99	\$38.65
141	Sep-27	Sep	2027	Summer	\$0.00	\$0.00	\$33.97	\$23.39	\$18.99	\$11.84	\$52.96	\$35.23
142	Oct-27	Oct	2027	Shoulder	\$0.00	\$0.00	\$32.49	\$22.37	\$15.82	\$13.13	\$48.40	\$35.50
143	Nov-27	Nov	2027	Shoulder	\$0.00	\$0.00	\$43.95	\$30.20	\$11.13	\$12.10	\$54.98	\$42.30
144	Dec-27	Dec	2027	Winter	\$0.00	\$0.00	\$67.83	\$46.71	\$4.43	\$12.30	\$72.26	\$59.01
145	Jan-28	Jan	2028	Winter	\$0.00	\$0.00	\$102.44	\$70.54	\$4.55	\$5.95	\$107.88	\$76.50
146	Feb-28	Feb	2028	Winter	\$0.00	\$0.00	\$97.75	\$60.43	\$2.40	\$8.20	\$95.35	\$68.64
147	Mar-28	Mar	2028	Shoulder	\$0.00	\$0.00	\$45.64	\$31.43	\$12.09	\$14.55	\$57.74	\$45.98
148	Apr-28	Apr	2028	Shoulder	\$0.00	\$0.00	\$36.48	\$25.12	\$13.90	\$11.69	\$50.30	\$36.81
149	May-28	May	2028	Summer	\$0.00	\$0.00	\$33.46	\$23.04	\$6.88	\$12.38	\$50.34	\$35.42
150	Jun-28	Jun	2028	Summer	\$0.00	\$0.00	\$35.22	\$24.25	\$6.78	\$10.70	\$52.00	\$34.95

[Link-to-previous setting changed from on in original to off in modified.].

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
781	Jul-38	Jul	2038	Summer	\$0.00	\$0.00	\$17.41	\$25.77	\$20.47	\$14.94	\$47.88	\$45.61
782	Aug-38	Aug	2038	Summer	\$0.00	\$0.00	\$16.95	\$25.45	\$24.25	\$12.65	\$41.20	\$38.95
783	Sep-38	Sep	2038	Summer	\$0.00	\$0.00	\$22.26	\$22.90	\$10.89	\$11.84	\$52.25	\$34.74
784	Oct-38	Oct	2038	Shoulder	\$0.00	\$0.00	\$18.81	\$21.90	\$15.92	\$13.11	\$47.72	\$38.63
785	Nov-38	Nov	2038	Shoulder	\$0.00	\$0.00	\$42.83	\$29.57	\$11.12	\$12.10	\$54.06	\$41.67
786	Dec-38	Dec	2038	Winter	\$0.00	\$0.00	\$16.41	\$45.73	\$4.43	\$12.30	\$70.44	\$50.63
787	Jan-39	Jan	2039	Winter	\$0.00	\$0.00	\$100.77	\$65.40	\$4.55	\$5.95	\$86.22	\$70.35
788	Feb-39	Feb	2039	Winter	\$0.00	\$0.00	\$16.32	\$59.45	\$2.40	\$9.20	\$55.92	\$37.66
789	Mar-39	Mar	2039	Shoulder	\$0.00	\$0.00	\$44.90	\$30.32	\$12.09	\$14.55	\$57.90	\$45.47
790	Apr-39	Apr	2039	Shoulder	\$0.00	\$0.00	\$35.89	\$24.71	\$13.30	\$11.69	\$49.79	\$36.40
791	May-39	May	2039	Summer	\$0.00	\$0.00	\$32.91	\$22.67	\$16.88	\$12.38	\$43.90	\$35.05
792	Jun-39	Jun	2039	Summer	\$0.00	\$0.00	\$34.65	\$23.86	\$16.79	\$10.70	\$51.43	\$34.56
793	Jul-39	Jul	2039	Summer	\$0.00	\$0.00	\$26.81	\$25.35	\$20.47	\$14.94	\$47.28	\$45.75
794	Aug-39	Aug	2039	Summer	\$0.00	\$0.00	\$16.35	\$25.01	\$24.25	\$12.66	\$60.60	\$37.68
795	Sep-39	Sep	2039	Summer	\$0.00	\$0.00	\$32.72	\$22.53	\$18.89	\$11.84	\$51.71	\$34.72
796	Oct-39	Oct	2039	Shoulder	\$0.00	\$0.00	\$31.29	\$21.55	\$15.92	\$13.11	\$47.21	\$34.67
797	Nov-39	Nov	2039	Shoulder	\$0.00	\$0.00	\$42.83	\$29.09	\$11.12	\$12.10	\$52.36	\$41.66
798	Dec-39	Dec	2039	Winter	\$0.00	\$0.00	\$15.33	\$44.93	\$4.43	\$12.30	\$69.76	\$57.29
799	Jan-40	Jan	2040	Winter	\$0.00	\$0.00	\$101.48	\$66.89	\$4.55	\$5.95	\$86.83	\$70.84
170	Feb-40	Feb	2040	Winter	\$0.00	\$0.00	\$16.94	\$59.87	\$2.40	\$9.20	\$54.94	\$36.88
171	Mar-40	Mar	2040	Shoulder	\$0.00	\$0.00	\$45.22	\$30.14	\$12.09	\$14.55	\$57.21	\$45.68
172	Apr-40	Apr	2040	Shoulder	\$0.00	\$0.00	\$36.14	\$24.89	\$13.30	\$11.69	\$50.04	\$36.50
173	May-40	May	2040	Summer	\$0.00	\$0.00	\$33.14	\$22.83	\$16.88	\$12.38	\$50.02	\$35.21
174	Jun-40	Jun	2040	Summer	\$0.00	\$0.00	\$34.89	\$24.03	\$16.79	\$10.70	\$51.57	\$34.73
175	Jul-40	Jul	2040	Summer	\$0.00	\$0.00	\$27.07	\$25.52	\$20.47	\$14.94	\$47.54	\$46.27
176	Aug-40	Aug	2040	Summer	\$0.00	\$0.00	\$16.60	\$25.21	\$24.25	\$12.66	\$60.60	\$37.67
177	Sep-40	Sep	2040	Summer	\$0.00	\$0.00	\$32.95	\$22.68	\$18.89	\$11.84	\$52.04	\$34.52
178	Oct-40	Oct	2040	Shoulder	\$0.00	\$0.00	\$31.51	\$21.70	\$15.92	\$13.11	\$47.43	\$34.63
179	Nov-40	Nov	2040	Shoulder	\$0.00	\$0.00	\$42.83	\$29.29	\$11.12	\$12.10	\$52.66	\$41.28
180	Dec-40	Dec	2040	Winter	\$0.00	\$0.00	\$15.79	\$45.31	\$4.43	\$12.30	\$70.22	\$57.61
181	Jan-41	Jan	2041	Winter	\$0.00	\$0.00	\$104.70	\$72.80	\$4.55	\$5.95	\$89.85	\$73.86
182	Feb-41	Feb	2041	Winter	\$0.00	\$0.00	\$16.68	\$61.77	\$2.40	\$9.20	\$57.29	\$38.97
183	Mar-41	Mar	2041	Shoulder	\$0.00	\$0.00	\$46.05	\$32.13	\$12.09	\$14.55	\$58.76	\$46.68
184	Apr-41	Apr	2041	Shoulder	\$0.00	\$0.00	\$37.28	\$25.69	\$13.30	\$11.69	\$51.03	\$37.17
185	May-41	May	2041	Summer	\$0.00	\$0.00	\$34.20	\$23.95	\$16.88	\$12.38	\$51.08	\$35.92
186	Jun-41	Jun	2041	Summer	\$0.00	\$0.00	\$36.00	\$24.78	\$16.79	\$10.70	\$52.76	\$35.43
187	Jul-41	Jul	2041	Summer	\$0.00	\$0.00	\$28.24	\$26.34	\$20.47	\$14.94	\$48.71	\$47.18
188	Aug-41	Aug	2041	Summer	\$0.00	\$0.00	\$27.77	\$26.01	\$24.25	\$12.66	\$62.02	\$38.47
189	Sep-41	Sep	2041	Summer	\$0.00	\$0.00	\$32.99	\$23.41	\$18.89	\$11.84	\$52.96	\$35.25
190	Oct-41	Oct	2041	Shoulder	\$0.00	\$0.00	\$32.51	\$22.39	\$15.92	\$13.11	\$48.43	\$35.01
191	Nov-41	Nov	2041	Shoulder	\$0.00	\$0.00	\$43.88	\$30.22	\$11.12	\$12.10	\$53.00	\$42.30
192	Dec-41	Dec	2041	Winter	\$0.00	\$0.00	\$17.28	\$46.74	\$4.43	\$12.30	\$72.21	\$59.64
193	Jan-42	Jan	2042	Winter	\$0.00	\$0.00	\$100.29	\$74.58	\$4.55	\$5.95	\$83.74	\$68.93
194	Feb-42	Feb	2042	Winter	\$0.00	\$0.00	\$17.77	\$62.89	\$2.40	\$9.20	\$60.37	\$42.89
195	Mar-42	Mar	2042	Shoulder	\$0.00	\$0.00	\$46.26	\$32.22	\$12.09	\$14.55	\$60.26	\$47.78
196	Apr-42	Apr	2042	Shoulder	\$0.00	\$0.00	\$39.56	\$28.56	\$13.30	\$11.69	\$52.47	\$38.25
197	May-42	May	2042	Summer	\$0.00	\$0.00	\$35.37	\$24.36	\$16.88	\$12.38	\$52.05	\$36.74
198	Jun-42	Jun	2042	Summer	\$0.00	\$0.00	\$37.23	\$25.64	\$16.79	\$10.70	\$54.01	\$36.34
199	Jul-42	Jul	2042	Summer	\$0.00	\$0.00	\$29.56	\$27.24	\$20.47	\$14.94	\$50.02	\$42.88
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$29.06	\$26.90	\$24.25	\$12.66	\$63.32	\$39.56

[Link-to-previous setting changed from on in original to off in modified.]

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone MG Connected On-Peak (Nominal \$/MWh)	PECO Zone MG Connected Off-Peak (Nominal \$/MWh)	PECO Zone Spunk Spread On-Peak (Nominal \$/MWh)	PECO Zone Spunk Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$13.00	\$25.30	\$18.25	\$12.55	\$5.12	\$19.55
201	Sep-42	Sep	2042	Summer	\$0.00	\$0.00	\$15.96	\$28.21	\$19.39	\$13.64	\$6.47	\$20.39
202	Oct-42	Oct	2042	Summer	\$0.00	\$0.00	\$15.62	\$25.96	\$19.32	\$13.12	\$6.51	\$19.23
203	Nov-42	Nov	2042	Summer	\$0.00	\$0.00	\$15.23	\$23.08	\$19.12	\$12.40	\$6.71	\$18.28
204	Dec-42	Dec	2042	Summer	\$0.00	\$0.00	\$19.21	\$41.35	\$24.41	\$16.35	\$10.69	\$20.01
205	Jan-43	Jan	2043	Winter	\$0.00	\$0.00	\$192.00	\$171.52	\$4.50	\$5.31	\$197.14	\$163.00
206	Feb-43	Feb	2043	Winter	\$0.00	\$0.00	\$19.50	\$39.20	\$12.40	\$5.20	\$197.33	\$171.23
207	Mar-43	Mar	2043	Winter	\$0.00	\$0.00	\$43.21	\$14.21	\$12.09	\$18.75	\$192.00	\$145.00
208	Apr-43	Apr	2043	Winter	\$0.00	\$0.00	\$13.00	\$27.81	\$19.39	\$13.64	\$192.00	\$139.49
209	May-43	May	2043	Winter	\$0.00	\$0.00	\$16.18	\$18.18	\$19.39	\$16.18	\$194.44	\$137.57
210	Jun-43	Jun	2043	Winter	\$0.00	\$0.00	\$16.72	\$18.72	\$19.39	\$16.72	\$197.22	\$137.22
211	Jul-43	Jul	2043	Winter	\$0.00	\$0.00	\$40.31	\$29.71	\$19.47	\$14.54	\$177.29	\$143.00
212	Aug-43	Aug	2043	Winter	\$0.00	\$0.00	\$40.40	\$27.60	\$18.45	\$12.55	\$164.15	\$130.40
213	Sep-43	Sep	2043	Winter	\$0.00	\$0.00	\$18.36	\$25.64	\$19.39	\$13.64	\$171.33	\$128.33
214	Oct-43	Oct	2043	Winter	\$0.00	\$0.00	\$14.11	\$23.88	\$19.32	\$13.12	\$170.18	\$127.18
215	Nov-43	Nov	2043	Winter	\$0.00	\$0.00	\$40.34	\$22.34	\$19.12	\$12.40	\$168.00	\$144.41
216	Dec-43	Dec	2043	Winter	\$0.00	\$0.00	\$12.14	\$19.80	\$18.45	\$12.55	\$171.38	\$134.38
217	Jan-44	Jan	2044	Winter	\$0.00	\$0.00	\$14.31	\$18.11	\$18.39	\$12.40	\$164.18	\$134.18
218	Feb-44	Feb	2044	Winter	\$0.00	\$0.00	\$17.46	\$17.44	\$12.40	\$12.23	\$167.33	\$137.69
219	Mar-44	Mar	2044	Winter	\$0.00	\$0.00	\$15.96	\$15.29	\$12.09	\$14.75	\$161.00	\$140.04
220	Apr-44	Apr	2044	Winter	\$0.00	\$0.00	\$40.32	\$18.04	\$19.39	\$13.64	\$164.12	\$130.12
221	May-44	May	2044	Winter	\$0.00	\$0.00	\$17.70	\$18.70	\$19.39	\$16.18	\$164.12	\$130.12
222	Jun-44	Jun	2044	Winter	\$0.00	\$0.00	\$17.22	\$17.22	\$19.39	\$16.18	\$166.69	\$130.69
223	Jul-44	Jul	2044	Winter	\$0.00	\$0.00	\$41.76	\$28.76	\$19.47	\$14.54	\$153.23	\$120.60
224	Aug-44	Aug	2044	Winter	\$0.00	\$0.00	\$41.25	\$26.40	\$18.45	\$12.55	\$145.50	\$140.00
225	Sep-44	Sep	2044	Winter	\$0.00	\$0.00	\$17.70	\$18.70	\$19.39	\$16.18	\$151.33	\$131.41
226	Oct-44	Oct	2044	Winter	\$0.00	\$0.00	\$15.96	\$18.45	\$19.32	\$13.12	\$150.42	\$131.94
227	Nov-44	Nov	2044	Winter	\$0.00	\$0.00	\$41.80	\$12.80	\$19.12	\$12.40	\$148.00	\$148.00
228	Dec-44	Dec	2044	Winter	\$0.00	\$0.00	\$14.12	\$17.12	\$18.45	\$12.39	\$145.96	\$145.96
229	Jan-45	Jan	2045	Winter	\$0.00	\$0.00	\$19.42	\$19.40	\$18.39	\$12.40	\$144.44	\$144.44
230	Feb-45	Feb	2045	Winter	\$0.00	\$0.00	\$13.23	\$18.41	\$12.40	\$12.23	\$139.18	\$139.18
231	Mar-45	Mar	2045	Winter	\$0.00	\$0.00	\$11.70	\$15.60	\$12.09	\$14.75	\$137.19	\$137.19
232	Apr-45	Apr	2045	Winter	\$0.00	\$0.00	\$11.21	\$18.47	\$12.09	\$13.64	\$132.00	\$140.00
233	May-45	May	2045	Winter	\$0.00	\$0.00	\$17.83	\$18.83	\$19.39	\$16.18	\$134.70	\$134.70
234	Jun-45	Jun	2045	Winter	\$0.00	\$0.00	\$13.83	\$17.83	\$19.39	\$16.18	\$134.70	\$134.70
235	Jul-45	Jul	2045	Winter	\$0.00	\$0.00	\$42.30	\$25.30	\$19.47	\$14.54	\$131.38	\$144.02
236	Aug-45	Aug	2045	Winter	\$0.00	\$0.00	\$41.05	\$29.82	\$18.45	\$12.55	\$145.40	\$145.40
237	Sep-45	Sep	2045	Winter	\$0.00	\$0.00	\$11.81	\$15.84	\$19.39	\$13.64	\$146.60	\$137.58
238	Oct-45	Oct	2045	Winter	\$0.00	\$0.00	\$14.02	\$18.31	\$19.32	\$13.12	\$145.54	\$137.50
239	Nov-45	Nov	2045	Winter	\$0.00	\$0.00	\$41.82	\$12.82	\$19.12	\$12.40	\$145.75	\$145.75
240	Dec-45	Dec	2045	Winter	\$0.00	\$0.00	\$13.20	\$15.20	\$18.45	\$12.39	\$143.84	\$143.84
241	Jan-46	Jan	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$12.40	\$14.39	\$13.39
242	Feb-46	Feb	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.40	\$12.23	\$13.40	\$12.23
243	Mar-46	Mar	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.75	\$13.59	\$13.59
244	Apr-46	Apr	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$13.64	\$13.50	\$13.64
245	May-46	May	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$16.18	\$16.00	\$16.18
246	Jun-46	Jun	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$16.18	\$16.36	\$16.18
247	Jul-46	Jul	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.47	\$14.54	\$16.47	\$14.54
248	Aug-46	Aug	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.45	\$12.55	\$16.15	\$12.55
249	Sep-46	Sep	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$13.64	\$16.39	\$13.64
250	Oct-46	Oct	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.32	\$13.12	\$16.30	\$13.12
251	Nov-46	Nov	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.12	\$12.40	\$16.70	\$12.40
252	Dec-46	Dec	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.45	\$12.39	\$16.43	\$12.39
253	Jan-47	Jan	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$12.40	\$16.49	\$12.40
254	Feb-47	Feb	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.40	\$12.23	\$16.40	\$12.23
255	Mar-47	Mar	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.75	\$16.59	\$14.75
256	Apr-47	Apr	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$13.64	\$16.50	\$13.64
257	May-47	May	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$16.18	\$16.00	\$16.18
258	Jun-47	Jun	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$16.18	\$16.36	\$16.18
259	Jul-47	Jul	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.47	\$14.54	\$16.47	\$14.54
260	Aug-47	Aug	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.45	\$12.55	\$16.15	\$12.55
261	Sep-47	Sep	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.39	\$13.64	\$16.39	\$13.64
262	Oct-47	Oct	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.32	\$13.12	\$16.30	\$13.12
263	Nov-47	Nov	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$19.12	\$12.40	\$16.70	\$12.40
264	Dec-47	Dec	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$18.45	\$12.39	\$16.43	\$12.39

[Link-to-previous setting changed from on in original to off in modified.].

Generation Capacity

Note: The 2027/2028 PJM Capacity Auction did not occur before the date of filing. Per discussion with the SWE, the established floor price of \$175/MW-day was used in the calculator in place of a settled value.

PJM BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028
PECO	PECO	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00

Seasonally Adjusted BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2025/2026	2025/2026	2025/2026	2026/2027	2027/2028	2021/2021	2021/2022	2025/2026	2026/2027	2027/2028
PECO	PECO	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50

Seasonally Adjusted PJM BRA Results (Real \$/kW-year)											
Summer						Winter					
2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average	2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average
\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56	\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal \$/kW-year)																		
Act 129 PY	DYPY Start	DYPY End	Summer								Winter							
			DLC	Met-Ed	PECO	Pennlec	Penn Power	PPL	West Penn	DLC	Met-Ed	PECO	Pennlec	Penn Power	PPL	West Penn	Inflation Flag	Input Flag
18	2026	2027	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
19	2027	2028	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
20	2028	2029	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	0	average
21	2029	2030	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	1	average
22	2030	2031	\$0.00	\$0.00	\$31.93	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.93	\$0.00	\$0.00	\$0.00	\$0.00	1	average
23	2031	2032	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	1	average
24	2032	2033	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	1	average
25	2033	2034	\$0.00	\$0.00	\$33.85	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.85	\$0.00	\$0.00	\$0.00	\$0.00	1	average
26	2034	2035	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	1	average
27	2035	2036	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	1	average
28	2036	2037	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	1	average
29	2037	2038	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	1	average
30	2038	2039	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	1	average
31	2039	2040	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	1	average
32	2040	2041	\$0.00	\$0.00	\$39.06	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.06	\$0.00	\$0.00	\$0.00	\$0.00	1	average
33	2041	2042	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	1	average
34	2042	2043	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	1	average
35	2043	2044	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	1	average
36	2044	2045	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	1	average
37	2045	2046	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	1	average
38	2046	2047	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	1	average
39	2047	2048	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	1	average

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$61.07	\$58.92	\$22.48	\$44.19	\$77.10	\$48.00	\$8.83
19	2027	2028	\$62.33	\$60.14	\$22.94	\$45.10	\$78.89	\$48.99	\$9.01
20	2028	2029	\$63.62	\$61.38	\$23.42	\$46.04	\$80.32	\$50.00	\$9.20
21	2029	2030	\$64.94	\$62.66	\$23.90	\$46.99	\$81.99	\$51.04	\$9.39
22	2030	2031	\$66.29	\$63.95	\$24.40	\$47.97	\$83.69	\$52.10	\$9.58
23	2031	2032	\$67.66	\$65.28	\$24.90	\$48.96	\$85.42	\$53.18	\$9.78
24	2032	2033	\$69.06	\$66.63	\$25.42	\$49.97	\$87.19	\$54.28	\$9.98
25	2033	2034	\$70.49	\$68.01	\$25.95	\$51.01	\$88.99	\$55.40	\$10.19
26	2034	2035	\$71.95	\$69.42	\$26.48	\$52.07	\$90.84	\$56.55	\$10.40
27	2035	2036	\$73.44	\$70.86	\$27.03	\$53.14	\$92.71	\$57.72	\$10.62
28	2036	2037	\$74.96	\$72.33	\$27.59	\$54.24	\$94.64	\$58.92	\$10.84
29	2037	2038	\$76.52	\$73.82	\$28.16	\$55.37	\$96.60	\$60.14	\$11.06
30	2038	2039	\$78.10	\$75.35	\$28.75	\$56.52	\$98.60	\$61.38	\$11.29
31	2039	2040	\$79.72	\$76.92	\$29.34	\$57.69	\$100.64	\$62.66	\$11.53
32	2040	2041	\$81.37	\$78.51	\$29.95	\$58.88	\$102.73	\$63.95	\$11.76
33	2041	2042	\$83.06	\$80.13	\$30.57	\$60.10	\$104.86	\$65.28	\$12.01
34	2042	2043	\$84.78	\$81.79	\$31.20	\$61.35	\$107.03	\$66.63	\$12.26
35	2043	2044	\$86.53	\$83.49	\$31.85	\$62.62	\$109.25	\$68.01	\$12.51
36	2044	2045	\$88.33	\$85.22	\$32.51	\$63.91	\$111.51	\$69.42	\$12.77
37	2045	2046	\$90.16	\$86.98	\$33.18	\$65.24	\$113.82	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer						
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
\$59.28	\$52.46	\$39.61	\$37.18	\$43.52	\$25.11	\$41.25
\$64.43	\$55.82	\$47.21	\$42.64	\$45.52	\$26.68	\$46.27
\$69.93	\$58.95	\$49.84	\$47.68	\$45.17	\$29.00	\$51.89
\$76.21	\$62.16	\$51.04	\$53.05	\$45.79	\$31.55	\$56.92
\$81.30	\$65.41	\$53.53	\$57.97	\$45.98	\$33.94	\$62.19
\$82.99	\$66.77	\$51.57	\$59.17	\$46.93	\$34.64	\$63.48
\$84.71	\$68.15	\$52.64	\$60.39	\$47.91	\$35.38	\$64.80
\$86.46	\$69.56	\$53.73	\$61.65	\$48.90	\$36.09	\$66.14
\$88.25	\$71.00	\$54.85	\$62.92	\$49.91	\$36.84	\$67.51
\$90.08	\$72.47	\$55.98	\$64.21	\$50.94	\$37.60	\$68.91
\$91.95	\$73.97	\$57.14	\$65.56	\$52.00	\$38.38	\$70.34
\$93.85	\$75.51	\$58.33	\$66.91	\$53.08	\$39.17	\$71.79
\$95.80	\$77.07	\$59.53	\$68.30	\$54.18	\$39.99	\$73.28
\$97.78	\$78.67	\$60.77	\$69.72	\$55.30	\$40.81	\$74.80
\$99.81	\$80.30	\$62.03	\$71.16	\$56.44	\$41.66	\$76.35
\$101.87	\$81.96	\$63.31	\$72.63	\$57.63	\$42.52	\$77.93
\$103.98	\$83.66	\$64.62	\$74.14	\$58.83	\$43.40	\$79.54
\$106.14	\$85.39	\$65.96	\$75.67	\$60.03	\$44.30	\$81.10
\$108.34	\$87.16	\$67.33	\$77.24	\$61.27	\$45.22	\$82.87
\$110.58	\$88.97	\$68.72	\$78.84	\$62.54	\$46.16	\$84.59

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$0.00	\$0.00	\$0.00	\$14.73	\$0.00	\$48.00	\$8.83
19	2027	2028	\$0.00	\$0.00	\$0.00	\$15.03	\$0.00	\$48.99	\$9.01
20	2028	2029	\$0.00	\$0.00	\$0.00	\$15.35	\$0.00	\$50.00	\$9.20
21	2029	2030	\$0.00	\$0.00	\$0.00	\$15.66	\$0.00	\$51.04	\$9.39
22	2030	2031	\$0.00	\$0.00	\$0.00	\$15.99	\$0.00	\$52.10	\$9.58
23	2031	2032	\$0.00	\$0.00	\$0.00	\$16.32	\$0.00	\$53.18	\$9.78
24	2032	2033	\$0.00	\$0.00	\$0.00	\$16.66	\$0.00	\$54.28	\$9.98
25	2033	2034	\$0.00	\$0.00	\$0.00	\$17.00	\$0.00	\$55.40	\$10.19
26	2034	2035	\$0.00	\$0.00	\$0.00	\$17.36	\$0.00	\$56.55	\$10.40
27	2035	2036	\$0.00	\$0.00	\$0.00	\$17.71	\$0.00	\$57.72	\$10.62
28	2036	2037	\$0.00	\$0.00	\$0.00	\$18.08	\$0.00	\$58.92	\$10.84
29	2037	2038	\$0.00	\$0.00	\$0.00	\$18.46	\$0.00	\$60.14	\$11.06
30	2038	2039	\$0.00	\$0.00	\$0.00	\$18.84	\$0.00	\$61.38	\$11.29
31	2039	2040	\$0.00	\$0.00	\$0.00	\$19.23	\$0.00	\$62.66	\$11.53
32	2040	2041	\$0.00	\$0.00	\$0.00	\$19.63	\$0.00	\$63.95	\$11.76
33	2041	2042	\$0.00	\$0.00	\$0.00	\$20.03	\$0.00	\$65.28	\$12.01
34	2042	2043	\$0.00	\$0.00	\$0.00	\$20.45	\$0.00	\$66.63	\$12.26
35	2043	2044	\$0.00	\$0.00	\$0.00	\$20.87	\$0.00	\$68.01	\$12.51
36	2044	2045	\$0.00	\$0.00	\$0.00	\$21.30	\$0.00	\$69.42	\$12.77
37	2045	2046	\$0.00	\$0.00	\$0.00	\$21.75	\$0.00	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter						
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
\$0.21	\$6.70	\$10.26	\$5.79	\$16.27	\$12.44	\$5.05
\$0.12	\$7.21	\$5.67	\$5.97	\$16.76	\$16.48	\$6.06
\$0.18	\$8.16	\$5.54	\$6.24	\$19.33	\$19.40	\$7.01
\$0.18	\$8.64	\$5.08	\$6.58	\$20.57	\$41.88	\$7.93
\$0.29	\$9.68	\$7.16	\$7.34	\$22.70	\$44.30	\$9.02
\$0.29	\$9.88	\$7.31	\$7.39	\$23.17	\$45.22	\$9.21
\$0.30	\$10.09	\$7.46	\$7.54	\$23.65	\$46.16	\$9.40
\$0.30	\$10.30	\$7.62	\$7.69	\$24.14	\$47.12	\$9.59
\$0.31	\$10.51	\$7.78	\$7.85	\$24.64	\$48.09	\$9.79
\$0.32	\$10.73	\$7.94	\$8.02	\$25.15	\$49.09	\$9.99
\$0.32	\$10.95	\$8.10	\$8.18	\$25.67	\$50.10	\$10.20
\$0.33	\$11.18	\$8.27	\$8.35	\$26.20	\$51.14	\$10.41
\$0.34	\$11.41	\$8.44	\$8.55	\$26.74	\$52.20	\$10.63
\$0.34	\$11.65	\$8.62	\$8.70	\$27.30	\$53.28	\$10.85
\$0.35	\$11.89	\$8.80	\$8.88	\$27.86	\$54.39	\$11.07
\$0.36	\$12.13	\$8.98	\$9.07	\$28.44	\$55.51	\$11.30
\$0.37	\$12.39	\$9.16	\$9.25	\$29.03	\$56.66	\$11.53
\$0.37	\$12.64	\$9.35	\$9.45	\$29.63	\$57.84	\$11.77
\$0.38	\$12.90	\$9.55	\$9.64	\$30.25	\$59.04	\$12.02
\$0.39	\$13.17	\$9.75	\$9.84	\$30.87	\$60.26	\$12.27

Summer Transmission (\$/kW-year system-level)			
EDC	2026	Tool	Lookup
PECO	\$22.48	PECO	
PPL	\$48.00	PPL	
Duquesne Light	\$61.07	DLC	
FE: Met-Ed	\$58.92	Met-Ed	
FE: Penelec	\$44.19	Penelec	
FE: Penn Power	\$77.10	Penn Power	
FE: West Penn Power	\$8.83	West Penn	

Summer Distribution (\$/kW-year Nominal)							
EDC	2026	2027	2028	2029	2030	Tool	Lookup
PECO	\$39.61	\$47.21	\$49.64	\$51.04	\$50.53	PECO	
PPL	\$25.11	\$26.68	\$29.00	\$31.55	\$33.94	PPL	
Duquesne Light	\$59.28	\$64.43	\$69.93	\$76.21	\$81.30	DLC	
FE: Met-Ed	\$52.46	\$55.82	\$58.95	\$62.16	\$65.41	Met-Ed	
FE: Penelec	\$37.18	\$42.64	\$47.98	\$53.05	\$57.97	Penelec	
FE: Penn Power	\$43.52	\$45.52	\$45.17	\$45.79	\$45.98	Penn Power	
FE: West Penn Power	\$41.25	\$46.27	\$51.89	\$56.92	\$62.19	West Penn	

Winter Transmission (\$/kW-year system-level)			
EDC	2026	Tool	Lookup
PECO	\$0.00	PECO	
PPL	\$48.00	PPL	
Duquesne Light	\$0.00	DLC	
FE: Met-Ed	\$0.00	Met-Ed	
FE: Penelec	\$14.73	Penelec	
FE: Penn Power	\$0.00	Penn Power	
FE: West Penn Power	\$8.83	West Penn	

Winter Distribution (\$/kW-year Nominal)							
EDC	2026	2027	2028	2029	2030	Tool	Lookup
PECO	\$10.26	\$5.67	\$5.54	\$5.08	\$7.16	PECO	
PPL	\$32.44	\$36.48	\$39.40	\$41.88	\$44.30	PPL	
Duquesne Light	\$0.21	\$0.12	\$0.18	\$0.18	\$0.29	DLC	
FE: Met-Ed	\$6.70	\$7.21	\$8.16	\$8.64	\$9.68	Met-Ed	
FE: Penelec	\$5.79	\$5.97	\$6.24	\$6.58	\$7.24	Penelec	
FE: Penn Power	\$16.27	\$16.76	\$19.33	\$20.57	\$22.70	Penn Power	
FE: West Penn Power	\$5.05	\$6.06	\$7.01	\$7.93	\$9.02	West Penn	

Adjustments

Record Field	Period	Month	Year	Transco B (Non-NY)	Locational Gas Adjustment (\$/MMBtu)
1	Jan-26	Jan	2026	\$7.51	\$3.233
2	Feb-26	Feb	2026	\$6.39	\$2.343
3	Mar-26	Mar	2026	\$3.43	-\$0.263
4	Apr-26	Apr	2026	\$3.62	-\$0.580
5	May-26	May	2026	\$2.80	-\$0.808
6	Jun-26	Jun	2026	\$3.01	-\$0.778
7	Jul-26	Jul	2026	\$3.33	-\$0.642
8	Aug-26	Aug	2026	\$3.32	-\$0.713
9	Sep-26	Sep	2026	\$2.83	-\$1.855
10	Oct-26	Oct	2026	\$2.73	-\$1.308
11	Nov-26	Nov	2026	\$3.43	-\$0.756
12	Dec-26	Dec	2026	\$5.37	\$0.705
13	Jan-27	Jan	2027	\$8.06	\$3.354
14	Feb-27	Feb	2027	\$6.93	\$2.357
15	Mar-27	Mar	2027	\$3.64	-\$0.273
16	Apr-27	Apr	2027	\$3.07	-\$0.439
17	May-27	May	2027	\$2.74	-\$0.743
18	Jun-27	Jun	2027	\$2.94	-\$0.674
19	Jul-27	Jul	2027	\$3.34	-\$0.623
20	Aug-27	Aug	2027	\$3.10	-\$0.731
21	Sep-27	Sep	2027	\$2.77	-\$1.024
22	Oct-27	Oct	2027	\$2.66	-\$1.204
23	Nov-27	Nov	2027	\$3.69	-\$0.365
24	Dec-27	Dec	2027	\$5.51	\$1.039
25	Jan-28	Jan	2028	\$8.23	\$3.468
26	Feb-28	Feb	2028	\$7.04	\$2.658
27	Mar-28	Mar	2028	\$3.76	\$0.011
28	Apr-28	Apr	2028	\$2.90	-\$0.414
29	May-28	May	2028	\$2.73	-\$0.572
30	Jun-28	Jun	2028	\$2.80	-\$0.626
31	Jul-28	Jul	2028	\$2.89	-\$0.709
32	Aug-28	Aug	2028	\$2.84	-\$0.815
33	Sep-28	Sep	2028	\$2.67	-\$0.969
34	Oct-28	Oct	2028	\$2.54	-\$1.151
35	Nov-28	Nov	2028	\$3.52	-\$0.357
36	Dec-28	Dec	2028	\$5.36	\$1.050
37	Jan-29	Jan	2029	\$8.06	\$3.483
38	Feb-29	Feb	2029	\$6.96	\$2.672
39	Mar-29	Mar	2029	\$3.61	\$0.016
40	Apr-29	Apr	2029	\$2.97	-\$0.487
41	May-29	May	2029	\$2.78	-\$0.358
42	Jun-29	Jun	2029	\$2.90	-\$0.407
43	Jul-29	Jul	2029	\$3.00	-\$0.483
44	Aug-29	Aug	2029	\$2.96	-\$0.597
45	Sep-29	Sep	2029	\$2.78	-\$0.780
46	Oct-29	Oct	2029	\$2.66	-\$0.953
47	Nov-29	Nov	2029	\$3.35	-\$0.445
48	Dec-29	Dec	2029	\$5.16	\$0.520

Month	Locational Adjustment (\$/MMBtu)	Load Shape	Spark Spread On-Peak (\$/MWh)	Spark Spread Off-Peak (\$/MWh)		
Jan	\$3.33	208.4%	-\$4.65	\$5.83	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.
Feb	\$2.51	178.6%	-\$2.45	\$8.04		
Mar	-\$0.13	92.9%	\$11.85	\$14.25		
Apr	-\$0.40	74.2%	\$13.62	\$11.45		
May	-\$0.62	68.1%	\$16.54	\$12.13		
Jun	-\$0.62	71.7%	\$16.44	\$10.48		
Jul	-\$0.61	76.1%	\$29.85	\$14.54		
Aug	-\$0.71	75.2%	\$23.76	\$12.40		
Sep	-\$0.98	67.7%	\$18.60	\$11.60		
Oct	-\$1.15	64.7%	\$15.59	\$12.86		
Nov	-\$0.48	87.4%	\$10.90	\$11.85		
Dec	\$0.93	135.1%	\$4.34	\$12.05		

AEPS

Year	2026
Load (MWh)	1,000

Credit	Tier Req (weight)	Price
Solar	0.5%	\$37.25
Tier I	8.0%	\$34.20
Tier II	10.0%	\$39.63

Required Credits	Cost
5	\$186
80	\$2,736
100	\$3,963
Total	185
	\$6,885

Weighted Avg. Price (Per Credit)
\$37.21

Weighted Avg. Price (Per MWh)
\$6.88

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

EXHIBIT 2

Exhibit 2

Comparison of Original and Revised Plan Design for Comprehensive Low-Income Measure Incentive Spending

Comprehensive Low Income Measure	Incentive Spending (\$) Settlement Plan (2/24/2026)	Incentive Spending (\$) Original Plan Filing (12/1/2025)	Difference
Basement or Crawl Space Wall Insulation	\$2,750.00	\$2,750.00	\$0.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	\$1,813,500.00	\$1,741,500.00	\$72,000.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	\$231,000.00	\$211,200.00	\$19,800.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	\$147,000.00	\$134,400.00	\$12,600.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	\$72,450.00	\$66,150.00	\$6,300.00
Duct Sealing & Duct Insulation	\$30,000.00	\$23,400.00	\$6,600.00
ENERGY STAR Manufactured Homes	\$0.00	\$0.00	\$0.00
Heat Pump Water Heaters	\$2,483,600.00	\$2,411,600.00	\$72,000.00
High Efficiency Equipment: ASHP	\$2,690,000.00	\$6,928,000.00	-\$4,238,000.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	\$206,000.00	\$206,000.00	\$0.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	\$8,576,000.00	\$2,160,000.00	\$6,416,000.00
HVAC Systems: PTAC	\$7,500.00	\$7,500.00	\$0.00
HVAC Systems: PTHP	\$400,000.00	\$342,000.00	\$58,000.00
Residential Air Sealing	\$816,650.00	\$807,500.00	\$9,150.00
Residential New Construction	\$0.00	\$0.00	\$0.00
Room Air Conditioners	\$58,000.00	\$58,000.00	\$0.00
WH LI > 10% UBC \$0.40/kWh	\$600,000.00	\$600,000.00	\$0.00
Total	\$18,134,450.00	\$15,700,000.00	\$2,434,450.00

STATEMENT A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**STATEMENT OF PECO ENERGY COMPANY
IN SUPPORT OF THE
JOINT PETITION FOR SETTLEMENT**

February 24, 2026

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**STATEMENT OF PECO ENERGY COMPANY
IN SUPPORT OF THE
JOINT PETITION FOR SETTLEMENT**

I. INTRODUCTION

PECO Energy Company (“PECO” or the “Company”) submits this Statement in Support of the Joint Petition for Settlement (the “Statement”) entered into by and among PECO and the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Tenant Union Representative Network (“TURN”), the Philadelphia Area Industrial Energy Users Group (“PAIEUG”), the City of Philadelphia and Philadelphia Energy Authority (“City/PEA”) and the Keystone Energy Efficiency Alliance (“KEEA”) (collectively, the “Joint Petitioners”). Approval of the settlement set forth in the Joint Petition (the “Settlement”) by the Pennsylvania Public Utility Commission (the “Commission”) will resolve all issues in this proceeding.

The Settlement was achieved only after a careful investigation by the other parties of the Company’s Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan (the “Phase V Plan” or “Plan”). The parties conducted substantial discovery and submitted written

direct and rebuttal testimony. In addition, the parties engaged in discussions and negotiations about the terms of the Settlement over the course of several weeks.

PECO fully agrees with each of the reasons for approval of the Settlement set forth in the Joint Petition. In this Statement, the Company offers additional reasons why the Settlement is in the public interest and should be approved.

II. THE SETTLEMENT IS IN THE PUBLIC INTEREST AND WILL FACILITATE THE ACHIEVEMENT OF PHASE V TARGETS AND THE DELIVERY OF MEANINGFUL SAVINGS TO CUSTOMERS

PECO's Phase V Plan, as modified by the Settlement, will implement a robust and balanced portfolio of energy efficiency ("EE") programs that will satisfy PECO's Phase V energy savings and peak demand reduction targets, meet the mandated energy savings carve-out for low-income customers, stay within applicable cost limitations and provide customers with comprehensive savings opportunities. Key elements of the Settlement are discussed below.

A. The Settlement Strengthens Support for Comprehensive Projects and Enhances Behavioral Programming

As originally filed, the Phase V Plan balanced investment in comprehensive, lighting and behavioral measures to meet mandatory energy efficiency ("EE") and peak demand reduction ("PDR") requirements in addition to other Phase V Implementation Order¹ requirements within statutory spending limitations. As compared to PECO's Phase IV Plan, PECO's Phase V proposal almost doubled the level of investment in residential and low-income comprehensive measures and continued PECO's reduction of investment in lighting measures initiated in earlier Phases. *See* PECO St. 2-R, pp. 4-5; PECO St. 3-R, pp. 2-3, 6-7. The proposal further included a reasonable amount of investment in residential behavioral programming (approximately 16% of overall

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

residential portfolio spending) in light of the broad customer reach, customer feedback on the relevance of the content, and demonstrated ability to generate savings. *See* PECO St. 2-R, pp. 4-5; PECO St. 3-R, pp. 2-7.

OCA, CAUSE-PA/TURN and the City/PEA each expressed concerns that the Plan did not sufficiently invest in comprehensive measures and made different proposals to address those concerns, including eliminating residential lighting measures entirely, reducing investment in lighting and/or behavioral measures, and increasing investment in heat pumps and building shell measures. *See, e.g.*, OCA St. 1, pp. 10-16, 20-23; CAUSE-PA/TURN St. 1, pp. 27-39; City/PEA St. 1, 14-15, 17-19, 21-23.

Under the Settlement, PECO made several commitments that would strengthen support for comprehensive projects and also enhance behavioral programming. First, PECO will update the Plan design to: (1) increase low-income comprehensive measure investment by \$2 million (to \$17.7 million); and (2) reduce the share of non-residential savings attributed to lighting measures from 44 to 40 percent and reallocate funds related to that reduction to non-lighting strategies. *See* Settlement, ¶¶ 12-13. Second, as to the Company’s non-low-income behavioral Home Energy Reports (“HER”) programming, PECO will leverage usage-based outreach approaches, enhance HER recommendations to emphasize comprehensive measures with longer lives, and limit Program spending to \$13,989,000. *See id.* at ¶ 15. In addition, PECO will draft a program strategy document outlining its approach to promoting projects with two or more comprehensive measures and will gather stakeholder input on the document at an Act 129 biannual stakeholder meeting. *See id.* at ¶ 14.²

² PECO also agreed to update Table 8 and Table 12 in the Phase V Plan to ensure that the comprehensiveness designations in those tables are consistent with the measures identified in the residential comprehensive measure list issued by the Commission in their Phase V plan template tables. *See* Settlement, ¶ 11.

B. The Settlement Includes Multiple Low-Income Sector Enhancements, Including Additional Education, Detailed Reporting and Appropriate Health and Safety Support

As originally filed, the Phase V Plan included low-income customer programming designed to exceed PECO's Phase V low-income carve-out requirement. Specifically, the Company proposed to have a low-income subprogram within both the Residential Program and the Residential HER Program. The Residential low-income subprogram included direct install whole-home, new construction, daily load shifting, appliance recycling, and multi-family components, along with health and safety spending up to \$3 million. The Residential HER low-income subprogram included behavioral reports with targeted messaging relevant to the low-income sector. *See* PECO St. 2, p. 9; PECO St. 1, pp. 9-10; PECO St. 2-R, p. 12.

CAUSE-PA/TURN expressed concerns that the low-income HER and low-income appliance recycling subcomponents were not sufficiently tailored to low-income customers to generate savings that could be counted towards PECO's low-income carve-out. *See* CAUSE-PA/TURN St. 1, pp. 36-39. CAUSE-PA/TURN also presented several recommendations related to customers enrolled in PECO's Customer Assistance Program ("CAP"), including targeting such customers for the installation of heat pumps and other "deep savings" measures, focusing outreach on CAP customers who have or are at risk of exhausting their annual CAP credit maximum, and tracking the Act 129 participation of CAP customers. *Id.* at pp. 39-46. CAUSE-PA/TURN further recommended that Act 129 auditors provide information about PECO's residential heating distribution rate (Rate RH) to a customer when permanently installed electric heating is identified during an energy audit of the customer's home. *See id.* at p. 48. Finally, the City/PEA expressed concern about the level of attention given to converting electric resistance heating customers to heat pumps as well as the sufficiency of health and safety funding, including whether PECO

intended to impose a cap of \$1,000 per household on health and safety spending. *See* City/PEA St. 1, pp. 8-9, 20-21.

Under the Settlement, PECO made several commitments addressing low-income sector issues. First, the Company agreed to not count savings generated by the Residential HER low-income subprogram towards PECO's Phase V low-income carve-out and also agreed to a range of tailored enhancements for the appliance recycling component of the Residential low-income subprogram. *See* Settlement, ¶¶ 17-18. Second, the Company agreed to actions to strengthen CAP customer awareness of EE programming through CAP outreach events, CAP Maximum Credit Notification letters, and training with community-based organizations, as well as to track and report information about CAP customer audits and measures. *See id.* at ¶¶ 16, 19, 21. Third, Act 129 auditors will provide Rate RH information to potentially eligible residential or low-income customers, and PECO will track electric resistance heating customers from low-income subprogram audits and provide those customers with information about moving to heat pumps. *See id.* at ¶ 20. Finally, PECO will not impose a standard per-household cap on health and safety spending for its Act 129 program in Phase V. *See id.* at ¶ 22.

C. The Settlement Includes Robust Provisions to Facilitate Coordination with External Partners

As originally filed, the Phase V Plan stated that PECO was exploring collaborations with other initiatives in its service territory to maximize savings and improve customer experience, including the Weatherization Assistance Programs and programs administered by the Pennsylvania Department of Environmental Protection ("PA DEP") and the City of Philadelphia. *See* PECO Exhibit 1, p. 13. The Company further explained that data sharing will be a foundational element in formalizing coordination with external partners and that PECO expects to develop formal coordination processes and protocols that will be informed by the outcome of the ongoing

Commission Data Sharing Working Group (the “Working Group”) process. *See* PECO St. 2-R, p. 9.

CAUSE-PA/TURN, KEEA and the City/PEA all highlighted the importance of coordinating with external programs and sought additional requirements for PECO’s collaboration plans. CAUSE-PA/TURN, for example, recommended data sharing agreements, formal referral protocols, dedicated staff capacity, sequencing standards and reporting, among other items. *See* CAUSE-PA/TURN St. 1, pp. 52-60. The City/PEA emphasized the need for well-defined roles and responsibilities among PECO, conservation service providers (“CSPs”) and external partners, while KEEA recommended formal coordination with PA DEP on stacked or braided funding. *See* City/PEA St. 1, pp. 5-8; KEEA St. 1, pp. 15-17.

Under the Settlement, PECO made several robust commitments to advance collaboration and coordination with external programs. First, PECO will continue to actively participate in the Working Group and will explain PECO’s reasoning to interested Joint Petitioners if the Company does not adopt a particular final recommendation or proposal from the Working Group. *See* Settlement, ¶¶ 28, 32. Second, PECO will establish a written coordination framework addressing a range of topics that include data sharing, customer privacy, communication and follow-up protocols, coordination and sequencing of Act 129 and external program measure implementation, and opportunities to braid funding sources. Stakeholders will have multiple opportunities to provide the Company with input on issues addressed in the framework. *See id.* at ¶¶ 24-26. Third, PECO will designate at least one staff-level coordination lead (the “Coordination Lead”) for maintaining coordination and referrals with external home repair, weatherization, and energy efficiency programs operating in PECO’s service territory, including the PEA and other agencies implementing the City of Philadelphia HOME plan. The Coordination Lead will also serve as the

point of contact for other non-profit or governmental housing, legal, and direct service providers operating in PECO's service territory for questions regarding Act 129 services for low-income residents whom they are assisting. *See id.* at ¶ 23. Finally, PECO will track and report on several coordination metrics and also reserve time during the biannual stakeholder meetings to discuss coordination efforts. *See id.* at ¶¶ 27, 29.

D. The Settlement Provides Additional Benefits to Low-to-Moderate Income and Multi-Family Customer Segments

As originally filed, the Phase V Plan included programming directed towards the multi-family sector. Specifically, the Residential Program and low-income subprogram included multifamily components seeking to provide energy savings and peak demand reduction in the common areas and residential spaces of multi-family buildings. *See, e.g.*, Phase V Plan, pp. 24-29, 68-72.

The OCA encouraged PECO to increase focus on the multifamily sector and also to target low-to-moderate income customers by: (1) exploring strategies to increase participation among market-rate multifamily households and establishing explicit non-low-income multi-family savings targets; and (2) establishing a pilot program with enhanced incentives for low-to-moderate income customers (151-250% of the Federal Poverty Level ("FPL")). *See* OCA St. 1, pp. 16-19, 25-27.

Under the Settlement, PECO has made commitments to benefit both the low-to-moderate income and multi-family customer segments. First, PECO will dedicate \$1 million to implement a pilot exploring energy efficiency opportunities for customers at 151-250% of the FPL. The Company will present pilot findings to stakeholders and discuss any related recommended changes to Plan offerings. *See* Settlement, ¶ 30. Second, PECO will require CSPs to collect multi-family housing information while implementing Phase V programs to facilitate the targeting of multi-

family properties and future Act 129 EE&C marketing strategies. *See id.* at ¶ 31. The Company will also track multi-family participation and savings data where feasible and summarize findings at the biannual stakeholder meetings. *See id.*

E. The Settlement Includes Additional Education, Training, Reporting and Daily Load Shifting Provisions to Improve Plan Implementation

Additional proposals and recommendations were made by parties to enhance PECO's Plan, such as: (1) integrating Act 129 engagement into the interconnection process (OCA St. 1, pp. 27-28); (2) bolstering workforce development and training, particularly concerning heat pumps (KEEA St. 1, pp. 17-19); (3) incorporating tracking and reporting on outreach efforts (KEEA St. 1, pp. 13-15); and (4) placing greater focus on potential daily load shifting opportunities for both residential and commercial and industrial ("C&I") customers (City/PEA St. 1, pp. 11-14; OCA St. 1 pp. 23-25).

Under the Settlement, PECO will advance each of these areas of interest. First, PECO will develop and maintain a formal process to ensure that all customers and prospective customers seeking interconnection with the Company are informed of available Act 129 programs, and PECO will report on this process at biannual stakeholder meetings. *See Settlement*, ¶ 35. Second, PECO will collaborate with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters. *See id.* at ¶ 33. Third, PECO will share information about Act 129 residential customer outreach activities, including residential customer surveys, at the biannual stakeholder meetings. *See id.* at ¶ 34. Finally, PECO's annual Act 129 report to the Commission will include participation information for the Plan's C&I daily load shifting measure, and the Company will reserve time at a biannual stakeholder meeting to discuss potential residential and C&I daily load shifting opportunities, pilot program concepts and relevant market developments. *See id.* at ¶¶ 36, 37.

III. CONCLUSION

The Settlement provides a reasonable means of resolving all issues raised in this proceeding. The Settlement also reduces the administrative burdens on the Commission and the litigation costs of all parties. Accordingly, for the reasons set forth above and in the Joint Petition, the Settlement is in the public interest and should be approved without modification.

Respectfully submitted,



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February 24, 2026

Counsel for PECO Energy Company

STATEMENT B

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
IN SUPPORT OF FULL SETTLEMENT

The Office of Consumer Advocate (OCA), one of the signatory parties to the Joint Petition for Approval of Full Settlement (Settlement), finds the terms and conditions of the Settlement to be in the public interest for the following reasons:

I. INTRODUCTION

On October 15, 2008, Act 129 of 2008 (Act 129 or the Act) was signed into law by Governor Edward G. Rendell. Act 129 made numerous amendments to Chapter 28 of the Public Utility Code and required the seven major electric distribution companies (EDCs) to file energy efficiency and conservation plans (EE&C Plans), which occurred in the summer of 2009. The Phase I Plans expired on May 31, 2013. Phase II of the EE&C Plans began on June 1, 2013 and expired on May 31, 2016. Phase III of the EE&C Plans began on June 1, 2016 and expired on May 31, 2021. Phase IV of the EE&C Plans began on June 1, 2021 and will continue until May 31, 2026. The Commission has now established the requirements and process for Phase V of the EE&C Plans to operate from June 1, 2026 through May 31, 2030. *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (June 18, 2025) (*Phase V Implementation Order*). This proceeding concerns the Phase V Plan of PECO Energy Company (PECO or the Company).

The Phase V Implementation Order directed that each EDC meet a consumption reduction target and a demand response target. *Phase V Implementation Order* at 12. The low-income targets represent 7.1% of the statewide MWh target and these reductions must be met through the low-income customer sector programs. *Id.* at 55. The Total Resource Cost (TRC) test will continue to be used to evaluate each EDC's EE&C Plan. *Id.* at 216-17.

Act 129 caps annual spending on the Plan at 2% of the EDC's total revenues for the calendar year 2006. 66 Pa. C.S. § 2806.1(g). The Act provides for full and current cost recovery of the Plan costs through an automatic adjustment rider, but it prohibits the recovery of lost revenues by the EDC through the automatic adjustment rider. 66 Pa. C.S. § 2806.1(k). The costs incurred are to be allocated to the classes that directly benefit from the program measures implemented, unless a system wide benefit can be shown.

On December 1, 2025, PECO filed the Petition of PECO Energy Company for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan (Phase V Plan). On December 2, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed its Petition to Intervene and Answer in the matter, and the Tenant Union Representative Network (TURN) filed its Petition to Intervene. The OCA filed a Notice of Intervention and Public Statement on December 9, 2025. On December 18, 2025, the Philadelphia Area Industrial Energy Users Group (PAIEUG) filed a Notice of Intervention and Public Statement. On December 19, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Intervention and Public Statement. The City of Philadelphia and Philadelphia Energy Authority (PEA) filed a Petition to Intervene on December 26, 2025. The filing was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Marta Guhl (ALJ Guhl) for investigation. On December 30, 2025, ALJ Guhl issued a Prehearing Conference Order.

On January 3, 2026, the matter was published in the *Pennsylvania Bulletin*. The telephonic Prehearing Conference was held on January 5, 2026 at which time a procedural schedule was established. On January 6, 2026, the Keystone Energy Efficiency Alliance (KEEA) filed a Petition to Intervene and Answer.

On January 20, 2026, the OCA submitted Direct Testimony of Zack Tyler (OCA Statement No. 1).¹ Also on January 20, 2026, Direct Testimony was filed by CAUSE-PA, KEEA, and the City of Philadelphia and PEA, together. On January 30, 2026, Rebuttal Testimony was filed by PECO and OSBA.

On February 2, 2026, the Evidentiary Hearing for this proceeding was held wherein the parties stipulated to the admission of written testimony and exhibits and waived cross-examination of all parties' witnesses. The OCA, PECO, OSBA, CAUSE-PA, KEEA, the City of Philadelphia, and PEA engaged in extensive Settlement discussions in an attempt to resolve the issues presented in this proceeding. On February 10, 2026, the Company informed the ALJ that the parties reached a Full Settlement, and that the Company will submit the Joint Petition for Settlement, accompanying Statements in Support, and Revised Phase V Plan on February 24, 2026. The Settlement provides for approval of PECO's Phase V EE&C Plan with certain modifications and clarifications related to issues raised by OCA Witness Tyler. For the reasons discussed below, the OCA submits that the Settlement is in the public interest and should be adopted.

¹ Mr. Tyler is a Managing Consultant with Energy Futures Group (EFG). At EFG, Mr. Tyler provides expert consulting services related to the design, implementation, and evaluation of programs and policies that promote investments in energy efficiency, renewable energy, distributed energy resources, and strategic electrification. Mr. Tyler brings over 16 years of experience working with energy efficiency and demand response programs and for approximately 14 years, he evaluated energy efficiency and demand response programs across the United States and Canada. OCA St. 1 at 1-2.

II. SUMMARY OF FILING

PECO's Phase V Plan, as filed, includes three overarching energy efficiency programs: the Residential Program, the Home Energy Reports (HER) Program, and the Non-Residential Program. OCA St. 1 at 3. Collectively, these programs are designed to achieve approximately 1,458,060 MWh of cumulative energy savings and 264.5 MW of peak demand reduction over the five-year Phase V period. *Id.* The Plan also includes a low-income energy savings target of 90,392 MWh. *Id.*

The total projected cost of the Plan is \$427,385,380, which represents the maximum spending level permitted under the Phase V Implementation Order. *Id.* Within the three overarching program categories, the Plan describes multiple subprograms, including income eligible offerings within the Residential and HER programs, as well as differentiated approaches for small and large commercial and industrial (C&I) customers within the Non-Residential Program. *Id.*

The Phase V Plan has an overall benefit-cost ratio (BCR) of 1.3 using the TRC test, including BCRs of 1.4 for both small and large C&I customers. *Id.* In addition, the Plan is designed to exceed the Phase V energy and peak demand reduction targets by a significant margin, with estimated energy savings equal to 131 percent of the Phase V requirement and peak demand reductions equal to 148 percent (summer) and 123 percent (winter) of the required targets. *Id.* The majority of the programs included in the Phase V Plan are continuations of programs offered during Phase IV, although certain elements have been modified. *Id.* at 4. For example, residential upstream incentives have been removed from the portfolio, while daily load shifting (DLS) measures have been added. *Id.*

The OCA did find PECO's Phase V Plan, as filed, complies with the requirements of the Phase V Implementation Order. *Id.* The Plan proposes energy and peak demand reductions that exceed the targets established in the Implementation Order, includes a variety of measures across customer classes, and is informed by the Phase V energy efficiency and demand response market potential studies. *Id.*

III. LEGAL STANDARDS

The Commission's policy promotes Settlements. 52 Pa. Code §§ 5.231, 69.401. In order to approve a Settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. PUC v. Philadelphia Electric Company*, 60 Pa. P.U.C. 1, 22 (1985); *Pa. PUC v. City of Bethlehem – Water Dept.*, Docket No. R-2020-3020256 (Order entered April 15, 2021) (*City of Bethlehem*) at 13 (citing *Pa. PUC v. York Water Co.*, Docket No. R-00049165 (Order entered October 4, 2004); *Pa. PUC v. C. S. Water and Sewer Assoc.*, 74 Pa. P.U.C. 767 (1991) (*CS Water and Sewer*)). "It is the Commission's duty to determine the public interest and to protect the rights of the public." *Duquesne Light Co. v. Pa. PUC*, 715 A.2d 540, 546 (Pa. Cmwlth. Ct. 1998) (citations omitted). The Commission recognizes that Settlements represent "a compromise of the positions held by the parties of interest, which, arguably fosters and promotes the public interest." *CS Water and Sewer*, 74 Pa. P.U.C. at 771.

Consistent with the Commission's other statutory responsibilities, the Commission must determine the public interest with "due consideration to the interests of consumers." 71 P.S. § 309-5 (2).

Proponents of an order bear the burden of proof. 66 Pa.C.S. § 332(a). Because the Settling Parties request that the Commission enter an order adopting the Settlement without modification, they share the burden of proof to show that the terms and conditions of the Settlement are in the

public interest. 66 Pa.C.S. § 332(a); *City of Bethlehem* at 13. It is well-established that the “degree of proof before administrative tribunals as well as before most civil proceedings is satisfied by establishing a preponderance of the evidence.” *Lansberry v. Pa. PUC*, 578 A.2d 600, 602 (Pa. Cmwlth. Ct. 1990) (*Lansberry*). For a Commission decision to be supported by substantial evidence, it must be supported by such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. *Dutchland Tours, Inc. v. Pa. PUC*, 337 A.2d 922, 925 (Pa. Cmwlth. 1975) (*Dutchland*). The evidence must be substantial and legally credible, not mere “suspicion” or a “scintilla” of evidence. *Lansberry*, 578 A.2d at 602.

IV. SETTLEMENT IS IN THE PUBLIC INTEREST

The Commission encourages Settlement, and to do so it must recognize the balance of compromises struck by settling parties. While the OCA does not address all issues contained within the Settlement in this Statement in Support, the OCA does not oppose terms and conditions not expressly addressed herein. The OCA submits that the Settlement, taken as a whole, is a reasonable compromise in consideration of likely litigation outcomes before the Commission. The OCA submits that the Settlement is in the public interest and supports Commission approval of the Settlement without modification. The OCA points to the substantial evidence in the record as support for the provisions addressed by the OCA below and relies on the other parties to the Settlement to address those provisions that are significant and material to them in their respective statements in support.

A. Moderate-Income Pilot Program (Settlement ¶ 30)

The PECO Phase V Plan, as filed, does not include dedicated incentives or programs designed to target moderate-income customers that may face similar affordability or program access barriers as low-income customers. OCA St. 1 at 17.

OCA witness Tyler expressed concern about the absence of a moderate-income-specific strategy in PECO's Phase V Plan because households that exceed the low-income eligibility threshold may still face significant barriers to participating in energy efficiency programs, including limited access to capital, high upfront costs, and split incentives. *Id.* 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. *Id.*

OCA witness Tyler testified that 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. *Id.* at 18. He explained that such an approach could help broaden access to energy efficiency measures while maintaining compliance with Act 129 requirements. *Id.* The program could target customers with annual household incomes between 150 percent and 250 percent of the Federal Poverty Level (FPL) to avoid overlapping with the low-income carve out. *Id.* He suggested that these approaches could be implemented on a pilot basis and evaluated for cost-effectiveness and participation outcomes before broader adoption. *Id.*

In rebuttal, PECO explained that it did not support allocating a specific portion of the residential budget exclusively to moderate-income customers. PECO St. 2-R at 10. PECO explained that this was because there is no clear, Commission-approved definition of "moderate income," nor an established and validated dataset that would enable the Company to reliably identify and target this customer segment at scale. *Id.* PECO testified that creation of this type of program would introduce unnecessary administrative complexity and could unintentionally compromise equitable access for all non-low-income residential customers. *Id.* Thus, the OCA and

the Company had divergent viewpoints regarding the value and need for a moderate-income-specific strategy in their litigated positions. The Settling Parties agreed to the following Provision:

30. PECO will dedicate \$1 million from its total Plan Residential Research and Development budget to a low- and moderate-income pilot, targeting energy efficiency opportunities within that specific customer segment (151%-250% of the Federal Poverty Level). PECO will identify and track implementation of comprehensive efficiency measures to these customers while advancing its overall energy savings goals. The pilot term will be up to 24 months. Once the pilot results have been analyzed, the Company will present pilot findings to PECO Act 129 stakeholders and discuss any recommended changes to energy efficiency offerings in PECO's Phase V Plan because of the pilot findings, including consideration of expanding the pilot and funding for the targeted customer group if the pilot demonstrates positive performance and there is available budget in the program.

(Settlement ¶ 30).

PECO's creation of a Low- and Moderate-Income pilot directly responds to the concerns raised by the OCA regarding the absence of a moderate-income-specific strategy in PECO's Phase V Plan. By dedicating \$1 million from the Residential Research and Development budget to a Low- and Moderate-Income pilot targeting customers between 151 percent and 250 percent of the FPL, the Settlement creates an opportunity to test and evaluate approaches designed to reach this underserved segment of customers. The pilot term of up to 24 months and a commitment to identify and track comprehensive efficiency measures delivered to customers participating in the pilot will allow PECO to manage portfolio risk and maintain compliance with Act 129. As suggested by OCA witness Tyler, such an approach can complement existing low-income programs without diluting resources intended for income-eligible households and will enable PECO to gather data on participation, cost-effectiveness, and savings outcomes before considering broader adoption. OCA St. 1 at 18.

The Settlement Provision also provides that PECO will present the pilot findings to Act 129 stakeholders and discuss recommended changes to its Phase V offerings based on those results, including potential expansion and additional funding if the pilot demonstrates positive

performance and budget is available. This approach promotes broader access to energy efficiency, advances overall portfolio savings goals, and ensures transparency and accountability. Therefore, the OCA respectfully recommends that the Commission approve the addition of this pilot program because it allows PECO to test a moderate-income strategy, broadening access to energy efficiency measures while maintaining compliance with Act 129 requirements. Accordingly, the OCA recommends that the Commission approve the same.

B. Multifamily Programs (Settlement ¶ 31)

PECO's Phase V Plan identifies approximately 1.5 GWh of non-low-income multifamily savings and approximately 18 GWh of low-income multifamily savings within the Multifamily program component. *Id.* at 25. The Multifamily component is limited to master-metered multifamily buildings and their occupants, representing a change from PECO's Phase IV program design, which included individually metered multifamily housing units in the overall Multifamily program reporting elements. *Id.*

PECO also indicated that energy savings associated with individually metered multifamily occupants are not reflected in the Multifamily program totals. *Id.* at 26. Instead, those customers are served through the Energy Assessments component of the Residential program or the Single-Family component of the Low-Income subprogram, with projected savings of approximately 10 GWh. *Id.*

OCA witness Tyler testified that the Phase V Plan does not clearly identify how the approximately 10 GWh of savings associated with individually metered multifamily occupants are allocated between low-income and non-low-income customers. *Id.* As a result, Mr. Tyler expressed concern that it is unclear whether these savings meaningfully increase participation among market-rate multifamily households, or whether they primarily and solely contribute to low-income program objectives. *Id.*

In addition, the OCA expressed concerns because even when accounting for these embedded savings, the level of explicitly identified non-low-income multifamily savings remains small relative to the multifamily potential identified in the Energy Efficiency and Peak Demand Reduction Market Potential Study. *Id.* The OCA raised questions about whether the Phase V portfolio adequately captures cost-effective multifamily opportunities outside the low-income carve-out. *Id.*

In rebuttal, Company Witness Geneles testified that PECO's multifamily housing market is very diverse, i.e. buildings differ in who owns them, how old they are, how utilities are metered, and the income levels of residents. PECO St. 2-R at 11. Because of that complexity, and because there is not a reliable, comprehensive dataset that breaks these buildings down by income level, PECO testified that it cannot accurately identify which properties fall into which income categories or confidently set energy-savings targets for them. *Id.*

The Settling Parties agreed to the following:

31. To facilitate the specific targeting of multifamily properties and future Act 129 EE&C marketing strategies of that customer segment, PECO will require CSPs to collect multi-family housing information while implementing Phase V programs. PECO will track multi-family participation and savings by measure, program, and income segment (low-income and non-low-income), where feasible. The Company will develop a data repository and summarize findings at the biannual Act 129 EE&C stakeholder meetings.

(Settlement ¶ 31).

This portion of the Settlement is in the public interest because it meaningfully enhances transparency, accountability, and data-driven program design within PECO's Phase V Act 129 portfolio. By requiring conservation service providers (CSPs) to collect detailed multifamily information and by committing the Company to track multifamily participation and savings by measure, program, and income segment (low-income and non-low-income), the term ensures that stakeholders and regulators will have a clearer and more accurate understanding of how savings

are distributed within the multifamily sector. The development of a centralized data repository and regular reporting at biannual Act 129 EE&C stakeholder meetings further promotes transparency and enables ongoing evaluation of program performance, instead of relying on static plan assumptions.

These commitments directly address the concerns raised by OCA witness Tyler regarding the lack of clarity surrounding the approximately 10 GWh of savings associated with individually metered multifamily occupants. By disaggregating participation and savings data by income segment, the Settlement ensures that stakeholders can determine whether those savings are meaningfully expanding access for market-rate multifamily households or are primarily supporting low-income objectives. This enhanced tracking will also allow the Company and interested parties to assess whether non-low-income multifamily savings remain disproportionately low relative to identified market potential and to adjust marketing or program strategies accordingly. This Settlement provision strengthens oversight, improves program targeting, and supports more effective capture of cost-effective multifamily opportunities, thus warranting Commission approval. Accordingly, the OCA recommends that the Commission approve the same.

C. Home Energy Reports (HER) (Settlement ¶¶ 13, 15)

In PECO's Phase V Plan, the HER program represents the largest single contributor to residential energy savings (30 percent of the residential portfolio) and accounts for a greater share of residential savings than in Phase IV. OCA St. 1 at 10. Specifically, non-low-income residential HER savings increase from approximately 112,656 MWh in the Phase IV Plan to 142,549 MWh in the Phase V Plan. *Id.* Because of its scale within the portfolio and its behavioral nature, the HER program has a significant influence on the durability, risk profile, and long-term performance of the residential portfolio. *Id.*

OCA witness Tyler testified that while the HER program has historically delivered cost-effective residential energy savings, increased reliance on HER savings in Phase V raises concerns related to savings durability and the magnitude of customer benefits. *Id.* at 11. HER savings are behavioral in nature and do not result in permanent physical improvements to customer homes, which means that 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. *Id.* Moreover, due to the lack of physical improvements, HER savings do not persist across homeowners or tenants when occupancy changes within a housing unit. *Id.*

Tyler also testified that the per-household energy savings associated with behavioral measures are generally modest relative to comprehensive efficiency upgrades. *Id.* 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. *Id.* Behavioral savings also tend to be driven disproportionately by higher-usage customers, which may affect how program benefits are distributed across income groups. *Id.*

From a portfolio perspective, Tyler noted that increased reliance on behavioral savings concentrates a larger share of residential savings in measures with shorter effective lives and modest per participant savings. *Id.* at 12. 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. *Id.* Given the fixed budgets associated with Act 129 programs, greater reliance on HER savings may limit the extent to which program resources are directed toward more comprehensive residential strategies, such as building envelope improvements and residential heat pump technologies. *Id.*

In rebuttal, Company witness Eeghen testified that behavior-oriented measures such as HERs deliver real, immediate savings at low incremental cost while educating customers on actions they can continue to take to reduce usage to a broad population of their customers. PECO St. 3-R at 4. PECO also claimed that the program leads to 5 to 8 percent of participants pursuing additional non-HER measures. *Id.*

PECO rejected OCA's claims that it is overly reliant on HER programs, noting that while residential HER savings account for approximately 37 percent of total residential savings, they represent only 16 percent of residential portfolio spending. *Id.* Similarly, in the low-income portfolio, HER programs generate 7 percent of savings with just 1 percent of spending. *Id.* at 4-5. PECO argued that limiting HER savings or restricting them to high-usage customers would reduce total savings, add administrative complexity, and potentially exclude customers who would benefit most. *Id.* at 5-6. Thus, the OCA and the Company had divergent viewpoints regarding the Company's continued reliance on HER in their litigated positions.

The Settling Parties agreed to the following:

13. PECO will adjust the Plan design to increase the low-income comprehensive measure spending by \$2M (to \$17.7M total) by reallocating funds from non-comprehensive measures. Low-income comprehensive measures are measures identified on the Comprehensive Measure List.

15. The Company will implement the non-low-income Home Energy Reports ("HER") program consistent with the savings, participation levels, and portfolio proposed in the PECO Phase V Plan filing. Outreach for the non-low income HER program will leverage usage-based targeting approaches, including identification of customers with higher electricity usage. The Company's non-low-income HER Program spending will not exceed \$13,989,000 as set forth in the filed Plan on December 1, 2025. PECO will enhance HER recommendations to emphasize comprehensive energy efficiency measures with longer measure lives. This will include targeted messaging related to building envelope improvements, heating and cooling upgrades, and participation in other Act 129 programs offering deeper savings opportunities, including the availability of low-income Act 129 programs.

(Settlement ¶¶ 13, 15).

This portion of the Settlement is in the public interest because it appropriately balances the continued use of the HER program with meaningful safeguards that mitigate the portfolio risks identified by OCA witness Tyler. While PECO will maintain the non-low-income HER program at the savings participation and budget levels proposed in its Phase V filing, the Settlement caps HER spending and prevents further expansion beyond the filed \$13,989,000 level. The Company also commits to increasing low-income comprehensive measure spending by \$2 million by reallocating funds from non-comprehensive measures, bringing total comprehensive low-income spending to \$17.7 million. This rebalancing directly shifts portfolio emphasis toward longer-lived, equipment- and envelope-based improvements that provide more durable savings, greater lifetime energy impacts, and more meaningful reductions in household energy burden.

These provisions also directly address concerns about modest per-household savings and overreliance on behavioral measures by requiring enhanced HER messaging that promotes deeper, long-lived efficiency upgrades. The plan as amended by Settlement will target higher-usage customers, where behavioral savings potential is greatest, and direct participants toward building envelope improvements, HVAC upgrades, and other comprehensive Act 129 offerings. These changes integrate physical improvements with more long-term savings with HER's short-term behavioral savings approach. These portions of the Settlement reduce portfolio risk, support better distribution of customer benefits, preserves flexibility within fixed Act 129 budgets, and ensure more durable savings outcomes. The OCA appreciates these Settlement provisions bolstering the Phase V Plan so that it is more strategic, durable, cost-effective, and equitable, while also mitigating risk. Accordingly, the OCA respectfully recommends that the Commission approve this plan modification.

D. Residential and Non-Residential Lighting (Settlement ¶ 12)

In PECO's Phase V Plan as filed, residential lighting represents 2.4 percent of the total portfolio and accounts for approximately 10 percent of projected residential energy savings. OCA St. 1 at 14. PECO proposes to achieve these savings through direct installation of lighting products. *Id.* This approach is compliant with applicable Act 129 requirements. *Id.* Non-residential lighting accounts for approximately 29 percent of total portfolio savings and approximately 44 percent of non-residential sector savings. *Id.* at 20. This is a reduction from PECO's Phase IV Plan in which non-residential lighting accounted for approximately 39 percent of the total Phase IV portfolio savings and approximately 53 percent of non-residential sector savings. *Id.*

OCA witness Tyler testified that residential lighting is a mature and highly saturated market, particularly following the adoption of updated federal minimum efficiency standards for general service lamps. *Id.* at 14. As a result, many customers would likely install LED lighting absent program intervention, raising concerns that a portion of claimed savings may reflect spillover or naturally occurring market activity rather than incremental program influence. *Id.* at 14-15. In addition, residential lighting is widely viewed as a market that has largely achieved transformation, meaning continued program funding is likely to yield diminishing returns over time. *Id.* Continued investment in residential lighting limits the resources available for other residential measures that offer more durable savings and greater long-term value, such as building envelope improvements and residential heat pump technologies. *Id.*

Echoing his concerns about residential lighting, OCA witness Tyler testified that PECO's continued reliance on non-residential lighting concentrates a large share of non-residential savings in a mature and increasingly saturated market which may limit the portfolio's ability to adapt as remaining lighting opportunities diminish. *Id.* at 21. As saturation increases, lighting programs face a growing risk of incentivizing LED-to-LED replacements or early retirements that yield

minimal incremental savings and inflate free-ridership. *Id.* This overreliance exposes the portfolio to heightened performance and compliance risk, as projected savings become increasingly sensitive to baseline assumptions and evaluation adjustments. *Id.* at 21-22. Continued dependence on lighting diverts resources from other non-residential measures that offer more durable, demonstrably incremental savings, and greater long-term value. *Id.* at 22.

In rebuttal, Company witness Eeghen argued that removing residential lighting from its Phase V energy efficiency plan is not justified, even though the lighting market has matured. PECO St. 3-R at 2. PECO argued that it already reduced lighting incentives significantly and noted that only 59 percent of sockets statewide contain LED bulbs, leaving meaningful remaining savings potential, and projected approximately 36,856 MWh of additional savings from this measure in Phase V, including low-income participation. *Id.* at 2-3. PECO also emphasized that, consistent with Technical Reference Manual requirements, it requires direct installation and verification of eligible lamps to prevent like-for-like replacements that would undermine savings. *Id.* at 3.

PECO similarly rejected the OCA's recommendation to further reduce non-residential lighting incentives. *Id.* PECO witness Eeghen asserted that although the market is maturing, PECO has already significantly decreased non-residential lighting incentives from 54 percent to 29 percent of portfolio spending, reducing funding from \$134.2 million to \$51.9 million. *Id.* The Company testified that lighting continues to represent more than half of the Phase V energy savings potential for small and large non-residential customers, supporting the continued inclusion of the measure at appropriate incentive levels. *Id.* PECO further explained that it has implemented safeguards to minimize LED-to-LED replacements. *Id.*

The Settling Parties agreed to the following:

12. PECO will reduce the share of non-residential savings attributed to lighting measures from approximately 44 percent to approximately 40 percent and

reallocate funds related to that reduction to non-lighting strategies within the Non-Residential Program.

(Settlement ¶ 12).

This Settlement provision meaningfully reduces portfolio concentration in a mature lighting market while preserving PECO's ability to comply with Act 129 requirements and overall savings performance goals. As filed, PECO's Phase V Plan continued to rely heavily on non-residential lighting with approximately 44 percent of non-residential sector savings attributable to lighting measures. The Settlement is in the public interest because by reducing that share to approximately 40 percent and reallocating associated funding to non-lighting strategies, the Settlement moderates the portfolio's exposure to a market segment that is increasingly saturated and sensitive to baseline and free-ridership assumptions. This shift strengthens the durability and incremental nature of projected savings and reduces performance and compliance risk over the life of the portfolio.

The Settlement also reflects a practical and balanced compromise in response to the OCA witness Tyler's broader concerns about lighting. While those concerns extended to both residential and non-residential lighting, particularly regarding market saturation and diminishing incremental savings, the Settling Parties focused the adjustment on the non-residential sector, where lighting represented a larger share of savings. Redirecting a portion of non-residential lighting resources to other measures supports greater diversification, encourages investment in longer-lived strategies, and improves the long-term viability of the portfolio. At the same time, the Settlement avoids abrupt program disruption and maintains continuity where lighting remains cost-effective and aids PECO in complying with savings goals. Therefore, the OCA respectfully recommends that the Commission approve this portion of the Settlement.

E. Commercial and Industrial (C&I) Daily Load Shifting (DLS) (Settlement ¶¶ 36, 37)

In PECO's Phase V Plan, the Company included approximately 0.1 MW of DLS for small C&I customers and 0.4 MW for large C&I customers. OCA St. 1 at 23. The majority of PECO's DLS efforts in Phase V are focused on the residential sector. *Id.* PECO indicated that its Phase V program design reflects feedback received through CSP solicitations, which suggested limited achievable C&I DLS potential within PECO's service territory. *Id.* According to PECO, CSP responses to its requests for proposals did not support the level of C&I DLS potential identified in the Demand Response Market Potential Study, as evidenced by the small amount of C&I DLS proposed by the respondents. *Id.* citing PECO Response to Discovery Request OCA-II-2.

The Demand Response Market Potential Study identifies greater cost-effective C&I DLS potential for PECO, estimating average realistic achievable annual peak demand reductions of 27.5 summer MW and 28.8 winter MW from C&I DLS. *Id.* at 23-24.

OCA witness Tyler testified that he was concerned about PECO's amount of C&I DLS in Phase V because it represents only a small fraction of the potential identified in the Commission-directed study. *Id.* DLS provides a different set of system benefits than traditional event-based demand response programs. *Id.* Unlike event-based demand response, which is typically called only during system emergencies or a limited number of peak days, DLS can provide regular, predictable reductions during high-cost hours and help shape load on an ongoing basis. *Id.* These characteristics can improve system efficiency, support peak demand management, and complement energy efficiency measures. *Id.* Also, as noted in the Demand Response Market Potential Study, DLS is different from the event-based demand response programs offered by PJM and avoids concerns around dual participation. *Id.*

Given these benefits, the limited inclusion of C&I DLS in Phase V in the Plan as filed raises questions about whether the Plan fully leverages available demand-side flexibility opportunities, particularly those identified as cost-effective in the Demand Response Market Potential Study. *Id.* Even limited pilots could help reconcile differences between CSP perceptions and the potential study results by generating PECO-specific empirical evidence. *Id.*

In rebuttal, Company witness Eeghen testified that he does not agree with the OCA's recommendation to significantly increase DLS targets for C&I customers in Phase V. PECO St. 3-R at 7-8. PECO explained that its proposed DLS levels were based on feedback received through competitive solicitations with CSPs, which indicated limited feasible interest and capability to deliver substantial C&I DLS at this time. *Id.* at 7. Although the Demand Response Market Potential Study identified higher theoretical potential, PECO stated that DLS remains a relatively new concept both in Pennsylvania and nationally, with few established utility models to replicate. *Id.* at 7-8.

PECO further testified that scaling DLS cost-effectively will require overcoming significant barriers, including identifying appropriate customers, incentive levels, control technologies, event dispatch strategies, marketing strategies, trade ally engagement, and measurement and verification methods. *Id.* at 8. The Company also clarified that the Phase V Plan includes 0.5 MW of C&I DLS, not 0.1 MW, as referenced by the OCA. *Id.*

The Settling Parties agreed to the following:

36. PECO will reserve an hour at the conclusion of a biannual stakeholder meeting for the interested parties to stay and discuss potential residential and C&I daily load shifting opportunities, pilot program concepts and relevant market developments.

37. PECO will include participation information about the C&I Load Shifting measure in PECO's Act 129 Final Annual Report.

(Settlement ¶¶ 36, 37).

These provisions of the Settlement are in the public interest because they create a structured and transparent forum to evaluate DLS opportunities in both the residential and C&I sectors without imposing potentially premature program commitments that may not reflect current market realities. As filed, PECO's Phase V Plan includes only limited C&I DLS, reflecting CSP feedback regarding achievable potential within its service territory. At the same time, the Commission-directed Demand Response Market Potential Study identified significantly greater cost-effective C&I DLS potential. By reserving dedicated time at each biannual stakeholder meeting to discuss residential and C&I load shifting opportunities, pilot concepts, and relevant market developments, the Settlement establishes an ongoing, collaborative mechanism to reconcile these differing perspectives and explore whether additional cost-effective DLS resources can be developed.

The OCA respectfully submits that these Settlement provisions are beneficial to consumers because they enhance accountability by requiring PECO to include participation information about the C&I Load Shifting measure in its Act 129 Final Annual Report. This reporting commitment ensures that stakeholders and regulators can track actual program uptake and performance, generating empirical, PECO-specific data that can inform future program design decisions. The OCA respectfully recommends that the Settlement be approved by the Commission because, together, these provisions directly address OCA witness Tyler's concerns that Phase V may underutilize demand-side flexibility opportunities by creating a transparent pathway for further evaluation, discussion, and potential expansion of DLS where justified. The OCA submits that these provisions are a reasonable compromise in consideration of likely litigation outcomes before the Commission as to these issues. Accordingly, the OCA recommends that the Commission approve this plan modification.

F. Interconnection Process and Act 129 Participation (Settlement at ¶ 35)

In its Phase V Plan as filed, PECO does not impose any energy efficiency requirements for new businesses seeking interconnection and does not appear to formally integrate Act 129 program engagement into the interconnection process. OCA St. 1 at 27.

OCA witness Tyler testified that, as a result, PECO may be missing an opportunity to promote energy efficiency and demand-side resources at a point in time when customers are making fundamental design and investment decisions. *Id.*

In rebuttal, Company witness Geneles testified that PECO already incorporates Act 129 program engagement into its processes for new and expanding C&I customers on an informal basis through coordination between its Act 129 and new business teams. PECO St. 2-R at 11. PECO, however, agreed with the OCA that a more formalized collaboration process could provide additional benefits. *Id.*

The Settling Parties agreed to the following:

35. Within 180 days of the start of Phase V, PECO shall develop, implement, and maintain a formal process to ensure that all customers and prospective customers seeking interconnection with the Company are informed of available Commission-approved Act 129 programs. This obligation shall include, at a minimum, residential new construction builders, data centers, and other commercial or industrial (“C&I”) customers. PECO shall include in their biannual stakeholder meetings a report out of the processes implemented to inform interconnection applicants of Act 129 programs, including any communication methods and updates or improvements.

(Settlement ¶ 35).

The OCA submits that this portion of the Settlement is in the public interest because it ensures that energy efficiency and demand-side resources are considered when customers are designing new facilities or preparing to interconnect new load. By requiring PECO to develop, implement, and maintain a formal process within 180 days of the start of Phase V to inform all interconnection applicants of available Commission-approved Act 129 programs, the agreement

closes a gap identified in the filed Plan. This proactive engagement will reach residential new construction builders, data centers, and other commercial and industrial customers at a time when efficiency investments are typically most cost-effective and easiest to incorporate into project design.

The Settlement provision directly addresses the OCA witness Tyler's concern that PECO was missing an opportunity to promote efficiency at the front end of major investment decisions. By institutionalizing outreach within the interconnection process and requiring biannual reporting to stakeholders on the communication methods used and any updates or improvements, the agreement promotes transparency, accountability, and continuous improvement. This structured approach increases the likelihood that new load will be built efficiently, supports long-term peak demand management, and enhances the overall effectiveness of the Act 129 portfolio. Accordingly, the OCA requests that the Commission approve this portion of the Settlement.

G. Other Program Enhancements (Settlement ¶¶ 16-29, 32-34)

The OCA by its participation in Settlement negotiations and through agreement with the Settling Parties believe the following adjustments to PECO's as-filed Phase V Plan will produce outcomes that benefit consumers and align with the Commission's Act 129 directives. Additionally, the Settlement includes these additional consumer protections and enhancements that might not otherwise be achieved by and through litigation of this case.

With respect to low-income programming, PECO will integrate Act 129 energy efficiency education into existing CAP outreach events, add information about Act 129 offerings to CAP Maximum Credit Notification letters, and coordinate with Community-Based Organizations to expand awareness. Settlement ¶¶ 16, 19. PECO will not count low-income HER savings toward the Phase V low-income carveout but will count savings from the Appliance Recycling component

of the low-income subprogram, which will include targeted marketing, cross-promotion of Free Energy Check-Ups, and opt-in audit scheduling. Settlement ¶¶ 17-18. PECO will also track and report audit and measure installation data for CAP customers, disaggregated by electric heating status, provide targeted materials to electric resistance heating customers regarding heat pump opportunities and Rate RH² eligibility, and eliminate a standard per-household cap on health and safety spending, instead assessing individual needs within the available budget. Settlement ¶¶ 20-22.

Regarding coordination, tracking, and stakeholder engagement, PECO will designate a Coordination Lead and develop a written coordination framework governing data sharing, privacy, referrals, funding braiding, and dispute resolution with external housing and weatherization partners. Settlement ¶¶ 23-24. The framework will be informed by stakeholder collaboratives, and PECO will track and publicly report referral and coordination metrics. Settlement ¶¶ 25-27. The Company will also engage stakeholders regarding recommendations of the Commission's Data Sharing Working Group, reserve stakeholder meeting time to evaluate and improve coordination efforts, and continue active participation in the Act 129 Data Sharing Working Group. Settlement ¶¶ 28-29, 32. Additional Plan changes include collaboration on heat pump workforce training with the Electric Association of Philadelphia and outreach to other training providers, as well as regular reporting at biannual stakeholder meetings regarding residential outreach and evaluation findings. Settlement ¶¶ 33-34. The OCA does not oppose any of the remaining paragraphs of the Settlement reflecting an agreement by the Company, as the remaining paragraphs are reasonable compromises in consideration of possible litigation

² PECO has two different residential rates: Rate R, which is electric baseload (non-heating) service, and Rate RH, which is electric heating service. CAUSE-PA/TURN St.1 at 46.

outcomes. Accordingly, the Settlement should be approved without modification, as it represents a fair and balanced resolution and is in the public's best interest.

V. CONCLUSION

The OCA submits that the terms and conditions of the proposed Settlement of the PECO proceeding represent a fair and reasonable resolution of the issues and claims arising in this matter. If approved, the proposed Settlement will benefit the Commission and all Parties by foregoing the additional costs of litigation and will provide consumers with a reasonable EE&C Plan. For the foregoing reasons, the Office of Consumer Advocate submits that the proposed Settlement is in the public interest and in the interest of PECO's customers and therefore, should be approved.

Respectively Submitted,

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STATEMENT C

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR SETTLEMENT
ON BEHALF OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. Introduction

The Small Business Advocate is authorized and directed to represent the interests of the small business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50.

Pursuant to that statutory authority, the Office of Small Business Advocate (“OSBA”) filed a notice of intervention in response to the Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation (“EE&C”) Plan with the Pennsylvania Public Utility Commission (“Commission”) on December 1, 2025.

The OSBA actively participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Settlement (“*Joint Petition*”). The *Joint Petition* addresses the issues raised by this office in this proceeding. Therefore, the OSBA submits this statement in support of the *Joint Petition*.

II. Standards for Approval of Non-Unanimous Settlement

Section 5.231(a) of the Commission’s regulations, 52 Pa. Code § 5.231(a) (Formal Proceedings; Hearings; Settlement and Stipulations; Offers of Settlement) states, as follows:

It is the policy of the Commission to encourage settlements.

Similarly, Section 69.401 of the Commission's regulations, 52 Pa. Code § 69.104 (Settlement Guidelines and Procedures for Major Rate Cases – Statement of Policy; General) states, as follows:

In the Commission's judgment, the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding.

III. Settlement Terms

As set forth in the *Joint Petition*, the OSBA negotiated several important concessions that will protect the interests of PECO's small businesses.

First, the *Joint Petition* directly addresses a long-standing concern regarding PECO's heavy reliance on small business lighting measures. While lighting measures have historically provided cost-effective savings, the small business lighting market has matured, and continued over-reliance on lighting is risky over a multi-year program. The Joint Petition proposes to reduce the non-residential lighting share from approximately 44 percent to approximately 40 percent, and the reallocation of that reduced funding to useful, non-lighting measures.¹ This change preserves cost-effectiveness while expanding opportunities for small businesses to pursue more comprehensive measures that offer longer lasting and more meaningful reductions in energy usage.

Second, the *Joint Petition* includes provisions requiring PECO to develop, implement, and maintain a formal process to ensure that all customers and prospective customers seeking interconnection are informed of available Commission-approved Act 129 programs.² This

¹ *Joint Petition*, Paragraph 12.

² *Joint Petition*, Paragraph 35.

requirement promotes early engagement with energy efficiency “up front,” particularly for new or expanding small businesses, when efficiency investments are often most cost-effective. As a result, improved access to information at the interconnection stage enhances small business's ability to make informed decisions and maximize program benefits without imposing participation mandates or additional costs.

Third, the remaining provisions of the *Joint Petition* primarily affect residential and low-income programs. The costs associated with those program enhancements are contained within the residential sector and do not shift costs to small businesses. The settlement does not alter approved cost allocation methodologies, does not increase small business EE&C surcharges, and does not impose new financial obligations on small business customers.

IV. **Conclusion**

Therefore, for the reasons set forth in the *Joint Petition*, as well as the issue set forth in this statement, the OSBA supports the proposed *Joint Petition* and respectfully requests that the ALJ and the Commission approve the *Joint Petition* in its entirety.

Respectfully submitted,

/s/ Steven C. Gray

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Dated: February 24, 2026

STATEMENT D

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company	:	
For Approval of its Act 129 Phase V	:	Docket No. M-2025-3057328
Energy Efficiency and Conservation Plan	:	

**STATEMENT OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA AND THE TENANT UNION
REPRESENTATIVE NETWORK IN SUPPORT OF THE JOINT PETITION FOR
SETTLEMENT**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Tenant Union Representative Network (“TURN”), signatory parties to the Joint Petition for Settlement (“Joint Petition” or “Settlement”), respectfully request that the terms and conditions of the Settlement be approved by the Honorable Administrative Law Judge Marta Guhl (“ALJ”) and the Pennsylvania Public Utility Commission (“Commission”) without modification. For the reasons stated more fully below, CAUSE-PA and TURN believe that the terms and conditions of the Settlement are in the public interest, are consistent with the Commission’s Phase V Final Implementation Order¹, and should be approved without delay.

I. INTRODUCTION

On December 1, 2025, PECO Energy Company (“PECO” or “Company”) filed its Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation (“EE&C”) Plan at the above captioned docket. CAUSE-PA and TURN intervened in this proceeding to ensure that PECO’s Phase V EE&C Plan (“Plan”) is appropriately designed to provide meaningful access to energy efficiency measures that deliver appreciable electricity and bill savings for low income

¹ Act 129 Energy Efficiency and Conservation Program, M-2025-3052826, Final Implementation Order (June 18, 2025) (hereinafter “Ph. V Implementation Order”).

customers and other vulnerable consumer groups, consistent with the Commission's Phase V Final Implementation Order. The proposed Settlement was arrived at through good faith negotiation by all parties and is in the public interest in that it addresses issues of concern to CAUSE-PA and TURN, balances the interests of the parties, and fairly addresses a number of issues raised in the proceeding. If approved, the Settlement will avoid substantial litigation and associated costs and will eliminate the possibility of further Commission litigation and appeals, along with their attendant costs. As such, and notwithstanding the fact that CAUSE-PA and TURN's positions were not fully adopted, we assert that the proposed Settlement strikes an appropriate balance and should be approved without modification.

II. BACKGROUND

CAUSE-PA and TURN adopt the background as set forth in Paragraphs 1 through 8 of the Joint Petition.

By way of further background, CAUSE-PA and TURN jointly submitted the expert testimony of Mr. Jim Grevatt in this proceeding. (CAUSE-PA/TURN St. 1). Through testimony, Mr. Grevatt explained that PECO serves a substantial number of low income customers who are unable to afford utility service and are in dire need of energy efficiency programs that deliver deep electricity savings to help control their usage and, in turn, reduce their monthly electric bills. (*Id.* at 16-27). In 2024, 24.3%, or 372,543, of PECO's residential customers were estimated to have income at or below 150% of the federal poverty level (FPL).² (*Id.* at 17). These low income households struggle to pay their bills at a far higher rate than residential customers overall, and as a result, in recent years, PECO has terminated service to low income customers at a rate more than

² At this level of income, a household of four has a gross annual income of less than \$48,225. (CAUSE-PA/TURN St. 1 at 15).

triple the rate of termination for residential customers overall. (Id. at 21-22). In addition, as Mr. Grevatt explained, low income households are more likely to live in energy inefficient homes, further compounding energy unaffordability and underscoring the dire need for comprehensive energy efficiency and conservation services for low income households. (Id. at 24-27).

In reviewing PECO's Phase V low income programming, Mr. Grevatt identified several issues. Mr. Grevatt explained that the Company's proposed plan placed too little emphasis on deep savings measures and projects such as heat pumps, heat pump water heaters, and building shell measures, and placed far too much emphasis on shallow savings measures such as lighting and other low-impact measures that do not produce meaningful bill savings for low income consumers. (Id. at 28-36). Mr. Grevatt explained that PECO's Plan did not indicate any plan to target customers participating in the Company's Customer Assistance Program (CAP) who are at risk of exceeding maximum CAP credit limits, or any plan to promote the benefits of PECO's residential heating rate (Rate RH) to customers participating in PECO's Act 129 programming. (Id. at 44-45; 46-48). Mr. Grevatt also explained that PECO's proposed approach to remediating health and safety barriers for low-income customers lacked sufficient tracking and reporting to ensure that customers were not deferred from program participation. (Id. at 49-51). Finally, Mr. Grevatt explained that the Plan lacked concrete details regarding coordination with external energy efficiency, weatherization, and home repair agencies that could, as the Commission emphasized in its Final Implementation Order, enable braided or stacked funding that could overcome barriers to delivering energy efficiency measures to customers. (Id. at 52-57)

III. TURN and CAUSE-PA SUPPORT FOR THE SETTLEMENT

The following terms of the Settlement address issues of concern raised by CAUSE-PA and TURN, as explained in Mr. Grevatt's testimony, and reflect a carefully balanced compromise of

the varied interests in this proceeding. As such, CAUSE-PA and TURN urge ALJ Guhl and the Commission to approve the Settlement without modification.

A. Comprehensiveness/Deeper Savings

In the Settlement, PECO has committed to taking steps to further incentivize comprehensive projects that will provide long lasting, meaningful savings to low income customers. Under the terms of the settlement, PECO will increase low-income comprehensive measure spending by \$2M by reallocating funds from non-comprehensive measures. (Joint Petition at ¶ 13).

PECO is revising Table 8 and Table 20 in the Plan to match what measures are identified as residential comprehensive measures with those identified by the PUC in their Phase V plan template tables. (Joint Petition at ¶ 11). This requirement ensures that the measures identified as comprehensive in Tables 8 and 20 match what the PUC considers comprehensive. PECO has also committed to drafting a program strategy document outlining its approach to promoting projects that include two or more comprehensive measures for installation and sharing that document with stakeholders. (Joint Petition at ¶ 14). In implementing the Home Energy Reports (“HER”) program, PECO will be required to enhance HER recommendations to emphasize comprehensive energy efficiency measures, including targeted messaging related to building envelope improvements, heating and cooling upgrades. (Joint Petition at ¶ 15). Finally, for non-residential savings, PECO will be required to reduce the share of savings attributed to lighting measures from approximately 44 percent to approximately 40 percent. (Joint Petition at ¶ 12).

CAUSE-PA and TURN assert that these provisions represent a reasonable compromise that appropriately balances the interests of the parties and interested stakeholders. As noted above, Mr. Grevatt explained in testimony that PECO’s proposed plan placed too little emphasis on deep

savings measures and projects such as heat pumps, heat pump water heaters, and building shell measures, instead placing far too much emphasis on shallow savings measures that do not produce meaningful bill savings for low income consumers. (CAUSE-PA/TURN St. 1 at 28-36). Mr. Grevatt also noted in his testimony that PECO's proposed plan categorized several measures as "comprehensive" that the PUC did not consider to be "comprehensive." (Id. at 28). The Settlement fairly addresses these concerns, in balance with other issues and interests in this proceeding. While the focus on more comprehensive measures may make the Residential Low-Income Program appear less cost effective, it will increase the focus on providing comprehensive, long-lived energy efficiency measures that will provide longer term, more meaningful savings to participating low-income households. As such, these terms are just, reasonable, and in the public interest and should be approved by the Commission.

B. Low-Income Sector

For Phase V, the Commission set PECO's low income savings target at 74,456 MWh, representing 6.7% of the Company's overall portfolio consumption reduction target from programs "solely directed at low-income customers or low-income-verified participants in multifamily housing programs."³ The Commission stated that "[s]avings from non-low-income programs, such as general residential programs, would not be counted toward these targets."⁴

The Settlement requires that PECO not count savings generated by the Low-Income HER program towards the Phase V low-income carveout. (Joint Petition at ¶ 17). This provision is consistent with the Phase V Implementation Order and Mr. Grevatt's recommendation. (CAUSE-PA/TURN St. 1 at 61). Mr. Grevatt observed that PECO has not demonstrated the proposed low-

³ Phase V Implementation Order at 55.

⁴ Id.

income HER and low-income recycling subcomponents are solely directed at low-income customers. He recommended that PECO should not be allowed to count savings from these subcomponents not be counted towards PECO's low-income savings requirement. (Id.) Although the Settlement does not adopt Mr. Grevatt's recommendation that the low-income recycling subcomponent not be counted towards PECO's low-income savings goals, it: (1) requires PECO to develop targeted messaging to low-income customers to drive participation at drop-off events and (if a vendor for pickup is obtained) pick-up events, (2) requires PECO to implement targeted marketing for the appliance recycling component of the low-income subprogram, and (3) requires that marketing materials for the appliance recycling component of the low-income program include information about the possible no cost measures available through Free Energy Check-Ups. (Joint Petition at ¶ 18).

The Settlement also requires PECO to, within 180 days of the start of Phase V, incorporate energy efficiency education into existing CAP outreach events. (Joint Petition at ¶ 16). Within the same 180 day timeframe, the Settlement requires PECO to add to the CAP Maximum Credit Notification letters sent to CAP customers information on how customers can obtain information about low-income Act 129 energy efficiency measures on PECO's website. (Joint Petition at ¶ 19). Additionally, the settlement commits PECO to coordinating with Community-Based Organizations to provide training and materials regarding Act 129 Low-Income program offerings. (Joint Petition at ¶ 19). The Settlement also requires that PECO include data in its Act 129 Final Annual Report demonstrating the following: (1) CAP customers who received an Act 129 audit, including any LIURP audit where Act 129 measures are installed; (2) customers who received any Act 129 measures following the audit; and (3) customers who received comprehensive measures following the audit. (Joint Petition at ¶ 21). The data will be disaggregated by CAP customers with

electric heating and those without electric heating. (Id.). Mr. Grevatt noted in his testimony that PECO does not appear to target CAP customers who are at risk of exceeding their maximum CAP credit limits for energy efficiency services. (CAUSE-PA/TURN St. 1 at 44). He observed that providing measures to CAP customers who are most at risk of exceeding CAP credit maximums promotes affordability, particularly if these households receive deep-saving measures. (Id. at 45). While the settlement terms discussed above do not fully enact Mr. Grevatt's recommendations about targeting CAP customers who are at risk of exceeding their CAP credit maximum with deep-savings measures, these terms do increase the likelihood that CAP customers at risk of exceeding their credit maximum will be able to access meaningful Act 129 measures.

With regard to electric heating customers, the Settlement requires PECO to track electric resistance heating customers who receive Free Energy Check-Ups and provide materials about the benefits of opportunities available to them to move away from electric resistance heating to heat pumps during Act 129 audits. (Joint Petition at ¶ 20). Relatedly, PECO has also agreed that when an Act 129 auditor identifies a residential or low-income customer who is potentially eligible for Rate RH, the auditor will provide that customer with information about how to switch to Rate RH. (Joint Petition at ¶ 20). These commitments are responsive to Mr. Grevatt's observations that low-income customers who rely on electric resistance baseboard heaters are likely to be the most energy burdened households due to high cost and relative inefficiency of electric resistance heaters. (CAUSE-PA/TURN St. 1 at 45). One of Mr. Grevatt's recommendations was that PECO install high efficiency heat pumps or other deep saving measures for a minimum of 250 CAP customers with inefficient electric resistance heat, and recommended that information gathered in an Act 129 Audit be a sufficient basis to switch a customer to the often more affordable Rate RH. (Id. at 61). While the settlement does not include these specific recommendations, the terms do require PECO

to provide targeted information to low-income electric resistance heating customers and to increase awareness of the availability of Rate RH, which will help attain the same goal of addressing the high electric usage and costs associated with electric resistance heating.

Finally, the Settlement emphasizes that PECO will not impose a per-household cap on health and safety spending, and will evaluate health and safety needs on an individual basis. (Joint Petition at ¶ 22). This term is consistent with Mr. Grevatt's support for not having a per-customer spending limit on health and safety assistance. (CAUSE-PA/TURN St. 1 at 50). CAUSE-PA and TURN assert that the low-income sector provisions of the settlement represent a reasonable compromise of the varied interests in this proceeding.

C. Coordination, Tracking and Data Collection, Data Sharing, and Stakeholder

Engagement

TURN and CAUSE-PA raised concerns in this proceeding regarding the extent to which PECO's proposed Phase V Plan would meaningfully coordinate its Act 129 Residential and Low-Income programs with other home repair, weatherization, and energy efficiency programs operating throughout PECO's service territory. As Mr. Grevatt described in his testimony, coordination is essential to achieving deeper savings, reducing customer burden, and ensuring that low-income households receive comprehensive and durable energy improvements. (CAUSE-PA/TURN St. 1 at 53-55; 58-60).

The Settlement meaningfully strengthens PECO's coordination obligations and creates enforceable commitments with defined timelines, deliverables, and reporting requirements. The coordination provisions, set forth in Paragraphs 23 through 29 of the Joint Petition for Settlement, represent substantial improvements to PECO's Phase V Plan as filed. Further, they are consistent with the Commission's directives in the Phase V Implementation Order emphasizing

comprehensive measures, deeper savings, and effective program delivery. (See CAUSE-PA/TURN St. 1 at 55).

1. Designation of a Coordination Lead

In his testimony, Mr. Grevatt recommended that PECO dedicate staff capacity and administrative resources to help manage coordination efforts, as part of his general recommendations to bolster PECO's coordination with external programs in Phase V. (CAUSE-PA/TURN St. 1 at 59). Under the Settlement, within 180 days of the start of Phase V, PECO must designate at least one staff-level Coordination Lead responsible for maintaining coordination and referrals with external home repair, weatherization, and energy efficiency programs operating in PECO's service territory. (Joint Petition at ¶ 23). These coordination partners include, but are not limited to, the Philadelphia Housing Development Corporation, the Philadelphia Energy Authority, weatherization and home repair agencies in PECO's service territory, agencies implementing the City of Philadelphia's H.O.M.E. Initiative, and other governmental or nonprofit programs delivering housing stabilization or energy efficiency services in PECO's service territory. (Joint Petition at ¶ 23).

Importantly, the Settlement also requires that the Coordination Lead serve as a point of contact for non-profit and governmental housing, legal, and direct service providers (the "Service Providers") operating in PECO's service territory who are assisting low-income residents. This includes case managers, housing counselors, legal services organizations, and community-based organizations working directly with households to address utility affordability, housing conditions, and energy burdens. (Joint Petition at ¶ 23).

CAUSE-PA and TURN strongly support this provision. In practice, many low-income customers access Act 129 programs not through program marketing but through the assistance of

direct service providers who help them navigate multiple utility needs simultaneously, including utility arrears, home repairs, public benefits enrollment, and energy efficiency upgrades. Without a clearly identified contact at PECO, service providers often encounter delays, inconsistent information, or uncertainty regarding program eligibility and sequencing. By requiring a designated Coordination Lead who is responsible not only for inter-agency coordination but also for responding to inquiries from direct service providers, the Settlement creates a clear and accountable channel of communication that will benefit recipients of Act 129 services. This structure will facilitate more efficient referrals, improve problem resolution for individual households, and increase the likelihood that customers — particularly those facing complex housing and financial challenges — are able to successfully access Act 129 services in coordination with other repair or weatherization programs.

2. Development of a Written Coordination Framework

Both Mr. Grevatt and Alon Abramson (expert witness for the City of Philadelphia and the Philadelphia Energy Authority) identified that PECO's Plan relied on informal coordination and generalized referrals, rather than a comprehensive coordination strategy. (CAUSE-PA/TURN St. 1 at 58; City/PEA St. 1 at 6-8). As Mr. Grevatt noted, "[w]ithout formal referral pathways, defined sequencing of work, data-sharing protocols, and accountability for follow-through, coordination remains incidental rather than intentional." (CAUSE-PA/TURN St. 1 at 58-59).

The Settlement requires PECO to establish, within 180 days of the start of Phase V, a written coordination framework governing interaction between its Residential and Low-Income Act 129 programs and external coordination partners. The framework must, at a minimum, address:

- Data sharing methods and types of data to be shared;
- Customer privacy protections;

- Communication and follow-up protocols;
- Coordination or sequencing of Act 129 and external program measures, including consideration of minimizing the number of provider visits to a customer's home;
- Opportunities to braid funding sources;
- Dispute resolution protocols;
- Identification of other potentially applicable external programs; and
- A pathway for negotiated agreements between PECO and coordination partners.

(Joint Petition at ¶ 24).

The Settlement also requires PECO to convene collaborative meetings to gather stakeholder input before finalizing the framework and to provide an opportunity for written feedback on the draft framework. (Joint Petition at ¶¶ 25-26).

These provisions represent a significant advancement in favor of the public interest over the Plan as filed. They move coordination beyond informal referrals and require a documented structure capable of supporting sequencing of repairs and efficiency measures, integration with home repair programs, and funding alignment across multiple programs. This directly advances the Commission's Phase V emphasis on comprehensive projects and deeper savings by increasing the likelihood that customers will receive bundled or sequenced improvements rather than isolated measures.

3. Tracking, Reporting, and Transparency

The Settlement also requires PECO to track and publicly report coordination metrics, including:

- The number of referrals received from coordination partners;
- The number of referred customers completing Act 129 measures;
- The types of measures installed for referred customers; and\
- The number of customers referred by PECO to other programs.

This data must be presented at biannual stakeholder meetings and included in annual reports to the Commission. (Joint Petition at ¶ 27).

CAUSE-PA and TURN strongly support these provisions. Coordination cannot be evaluated or improved in the absence of measurable data. The reporting requirements create transparency and accountability and will allow the Commission and stakeholders to assess whether referrals are translating into installations and whether braided or sequenced projects are occurring in practice.

4. Stakeholder Engagement and Continuous Improvement

The Settlement requires PECO to reserve time at biannual stakeholder meetings to discuss coordination efforts, evaluate effectiveness, identify barriers, and consider improvements. In addition, PECO must convene discussions regarding recommendations issued by the Commission's Act 129 Data Sharing Working Group and explain whether and how it will adopt such recommendations. (Joint Petition at ¶¶ 28-29).

These provisions will ensure that coordination remains an ongoing and adaptive process during PECO's Phase V plan implementation, rather than a one-time compliance exercise. They also align with the Commission's broader Phase V policy objectives encouraging enhanced transparency, improved data access, and continuous program refinement.

In their entirety, the coordination, tracking and data collection, data sharing and stakeholder engagement provisions in the Settlement provide clear deliverables in the form of added staff capacity and a written coordination framework; structured stakeholder input and review; ongoing reporting and transparency obligations; and deadlines for compliance. At the same time, the provisions preserve appropriate flexibility for PECO to design implementation details in consultation with coordination partners and stakeholders.

These terms materially improve the Phase V Plan as filed. They strengthen the likelihood that Act 129 resources will be deployed in a manner that complements existing home repair and weatherization programs, reduces duplicative efforts, supports comprehensive projects, and delivers more durable benefits to low-income customers.

D. Low-to-Moderate Income and Multi-Family Sectors

The Settlement sets forth that PECO will dedicate \$1 million from its total Plan Residential Research and Development budget to a low-to-moderate income pilot, targeting energy efficiency opportunities for customers just over the income limits to be considered low-income (151% to 250% of the Federal Poverty Level). (Joint Petition at ¶ 30). CAUSE-PA and TURN support this provision, as it will provide meaningful benefits tailored to households who are not low-income, but nevertheless struggle to keep up with their electric bills and meaningfully reduce usage.

The Settlement further sets forth that PECO will require CSPs to collect multi-family housing information, including participation and savings by measure, program, and income segment. (Joint Petition at ¶ 31). CAUSE-PA and TURN support this provision as it will provide more information and transparency around how multi-family properties participate in PECO's Act 129 programs.

E. Additional Enhancements

In paragraphs 32 through 37 of the Settlement, PECO makes a number of different commitments, including agreeing to participate in the Act 129 Data Sharing Working Group, continuing collaboration opportunities to convene heat pump trainings for local contractors, reporting on outreach activities, development of a formal process to ensure customers and prospective customers seeking interconnection learn of the Act 129 programs, and discussing potential residential and C&I daily load shifting programs and opportunities. CAUSE-PA and

TURN specifically support the requirements that PECO continue to actively participate in the ongoing Act 129 Data Sharing Working Group and work with stakeholders to arrive at a common strategy and process for Phase V. (Joint Petition at ¶ 32). This commitment, in addition to the coordination terms discussed above, will further help improve PECO's coordination with other available programs.

F. Additional Terms and Conditions

The Settlement is made subject to conditions that further the Settlement's alignment with the public interest. (Joint Petition at ¶¶ 40-46.). Key conditions to the Settlement include statements that the Settlement is presented without prejudice to any position of the joining parties and does not create precedent (Joint Petition at ¶¶ 40-43); that every term and condition in the Settlement is material regardless of its placement in the body, footnotes, parentheticals, or otherwise in the Settlement's text (Joint Petition at ¶ 45); and that the Settlement's terms are self-effectuating upon issuance of a final order in this proceeding (Joint Petition at ¶ 46), among others. TURN and CAUSE-PA support the inclusion of these conditions in the Settlement and requests that the Commission approve the Settlement without modification.

IV. CONCLUSION

CAUSE-PA and TURN submit that the proposed Settlement, which was achieved by the Joint Petitioners after an investigation of the Company's filing, is in the public interest, and should be approved. Acceptance of the Settlement avoids the necessity of further administrative and possibly appellate proceedings regarding the settled issues at what would have been a substantial cost to the Joint Petitioners and the Companies' customers. Accordingly, CAUSE-PA and TURN respectfully request that ALJ Guhl and the Commission approve the Settlement without modification.

Respectfully submitted,

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Dated: February 24, 2026

STATEMENT E

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company	:	
For Approval of its Act 129 Phase V	:	Docket No. M-2025-3057328
Energy Efficiency and Conservation Plan	:	

**STATEMENT IN SUPPORT OF
THE PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

The Philadelphia Area Industrial Energy Users Group (“PAIEUG”), by and through its counsel, submits that the Joint Petition for Settlement (“Joint Petition” or “Settlement”), filed in the above-captioned proceeding, is in the public interest and represents a fair, just, and reasonable resolution of PECO Energy Company’s (“PECO” or “Company”) Petition for approval of its Act 129 Phase V Energy Efficiency and Conservation (“EE&C”) Plan (“Petition” or “Phase V EE&C Plan”). As a result of settlement discussions, PECO, PAIEUG, the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Tenant Union Representative Network (“TURN”), the City of Philadelphia and Philadelphia Energy Authority (“City/PEA”) and the Keystone Energy Efficiency Alliance (“KEEA”) (collectively, “Parties” or “Joint Petitioners”) have agreed upon the terms embodied in the foregoing Settlement. PAIEUG offers this Statement in Support to further demonstrate that the Settlement is in the public interest and should be approved without modification.

I. BACKGROUND

1. On December 1, 2025, PECO filed with the Commission the aforementioned Petition. Specifically, the Petition outlined the Company’s proposal to address the requirements

of Act 129 and the Commission's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025- 3052826.

2. On December 18, 2025, PAIEUG filed a Petition to Intervene in this proceeding . PAIEUG is an *ad hoc* group of energy-intensive customers receiving electric service from PECO under Rate HT. PAIEUG members consume substantial amounts of electricity in their manufacturing and operational processes, and these electric costs are a significant element of their respective costs of operation. Any modifications to PECO's electric rates may impact PAIEUG members' cost of operations.

3. A Prehearing Conference was held on January 5, 2026, before Administrative Law Judge ("ALJ") Marta Guhl. A procedural schedule was established for discovery, written testimony, settlement discussions, and hearings.

4. Pursuant to the established litigation schedule, Direct Testimony was submitted by the OCA, CAUSE-PA/TURN, KEEA and the City/PEA on January 20, 2026, and Rebuttal Testimony was submitted by PECO and OSBA on January 30, 2026.

5. An evidentiary hearing was held telephonically on February 2, 2026. All parties waived cross-examination of other party witnesses. At the hearing, all pre-filed testimony was admitted into evidence.

6. On or about February 10, 2026, the Parties informed the ALJ that a settlement in principle had been reached on all issues in this proceeding.

II. STATEMENT IN SUPPORT

6. The Commission has a strong policy favoring settlements. As set forth in the PUC's Regulations, "[t]he Commission encourages parties to seek negotiated settlements of contested proceedings in lieu of incurring the time, expense and uncertainty of litigation." 52 Pa.

Code § 69.391; *see also* 52 Pa. Code § 5.231. Consistent with the Commission's Policy, the Joint Petitioners engaged in negotiations to resolve the issues raised by various parties. These ongoing discussions produced the foregoing Settlement.

7. The Joint Petitioners agree that approval of the proposed Settlement is in the best interest of the parties involved.

8. The Settlement is in the public interest for the following reasons:

- a. As a result of the Settlement, expenses incurred by the Joint Petitioners and the Commission for completing this proceeding will be substantially less than they would have been if the proceeding had been fully litigated.
- b. Uncertainties regarding further expenses associated with possible appeals from the Final Order of the Commission are avoided as a result of the Settlement.
- c. The Settlement results in terms and provisions that present a just and reasonable resolution of the Company's proposed Phase V EE&C Plan.
- d. The Settlement reflects compromises on all sides presented without prejudice to any position any Joint Petitioner may have advanced so far in this proceeding. Similarly, the Settlement is presented without prejudice to any position any party may advance in future proceedings involving the Company.

9. Moreover, the Settlement provides that PECO will reserve an hour at the conclusion of a biannual stakeholder meeting for the interested parties to stay and discuss potential residential and Commercial & Industrial ("C&I") daily load shifting opportunities, pilot program concepts, and relevant market developments. *See* Settlement, ¶ 36. In addition, PECO will include participation information about the C&I Load Shifting measure in PECO's Act 129 Final Annual Report. *See id.*, ¶ 37.

10. PAIEUG supports the Settlement because it is in the public interest; however, in the event that the Settlement is rejected by the ALJ or the Commission, PAIEUG will resume its litigation position, which may differ from the terms of the Settlement.

11. As set forth above, PAIEUG submits that the Settlement is in the public interest and adheres to the Commission's policies promoting negotiated settlements. The parties achieved the Settlement after settlement discussions, including all active parties. While the Joint Petitioners have invested time and resources in the negotiation of the Settlement, this process has allowed the parties, and the Commission, to avoid expending the substantial resources that would have been required to fully litigate this proceeding while still reaching a just, reasonable, and non-discriminatory result. The Joint Petitioners have thus reached an amicable resolution to this dispute as embodied in the Settlement. Approval of the Settlement will permit the Commission and Joint Petitioners to avoid incurring the additional time, expense, and uncertainty of further litigation of issues in this proceeding. *See* 52 Pa. Code § 69.391.

III. CONCLUSION

WHEREFORE, the Philadelphia Area Industrial Energy Users Group respectfully requests that the Pennsylvania Public Utility Commission approve the Joint Petition for Settlement submitted in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: February 24, 2026

STATEMENT F

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, :
 : Docket No. M-2025-3057328
v. :
 :
PECO Energy Company – Electric Division :

STATEMENT OF THE CITY OF PHILADELPHIA
AND PHILADELPHIA ENERGY AUTHORITY
IN SUPPORT OF JOINT PETITION FOR SETTLEMENT

The City of Philadelphia (“City”) and Philadelphia Energy Authority (“PEA”) (jointly referred to as the “City and PEA”), signatory parties to the Joint Petition for Settlement (“Joint Petition” or “Settlement”), find the terms and conditions of the Settlement to be in the public interest and, therefore, request that the Pennsylvania Public Utility Commission approve of the Settlement, without modification.

I. BACKGROUND

On December 1, 2025, PECO Energy Company – Electric Division (“PECO” or “the Company”) filed with the Commission its Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan (“EE&C Plan”), which was subsequently assigned Docket No. M-2025-3057328 (“Petition”). PECO is engaged in the business of furnishing electric service to approximately 1.7 million customers throughout a 2,100 square-mile area in southeastern Pennsylvania, including the entire city of Philadelphia. In its filed EE&C Plan, PECO proposed to spend a projected \$427.4 million over the five-year phase period (June 1, 2026, through May 31, 2031) to satisfy its Phase V energy savings and PDR targets.¹ PECO’s EE&C Plan was also designed to produce (1) 1,458,076 MWh in energy savings, or 131% of PECO’s overall energy

¹ Petition at 9.

savings target; and (2) 264.5 MW of PDR, or 136% of its PDR target.² With respect to residential customers, PECO has proposed the following four residential customer energy efficiency programs: (1) The Residential Program; (2) The Residential Low-Income Subprogram; (3) The Residential Home Energy Reports (HER) Program; and (4) Residential Low-Income HER Subprogram.³

On December 2, 2025, CAUSE-PA filed a Petition to Intervene and Answer and TURN filed a Petition to Intervene. On December 4, 2025, OSBA filed a Notice of Appearance and on December 19, 2025, filed a Notice of Intervention, Public Statement, and Verification. On December 5, 2025, OCA filed a Notice of Appearance and on December 9, 2025, a Notice of Intervention and Public Statement. On December 18, 2025, PAIEUG filed a Petition to Intervene. On December 26, 2025, the City and PEA filed a Petition to Intervene. Finally, on January 6, 2026, KEEA filed a Petition to Intervene and Answer.

The proceeding was assigned to The Honorable Marta Guhl, Administrative Law Judge (the “ALJ”), and a Prehearing Conference was held on January 5, 2026. The parties jointly established a litigation schedule for the proceeding and, pursuant to such schedule, direct testimony was submitted by the OCA, CAUSE-PA/TURN, KEEA and the City and PEA on January 20, 2026, and rebuttal testimony was submitted by PECO and OSBA on January 30, 2026. An evidentiary hearing was held telephonically on February 2, 2026. All parties waived cross-examination of other party witnesses. At the hearing, all pre-filed testimony was admitted into evidence.

The parties engaged in discussions to negotiate a settlement of some or all the issues in this case. As a result of those negotiations, the Joint Petitioners agreed to the Settlement on February

² Id. at 1.

³ Id. at 9-10.

10, 2025, resolving all issues in the proceeding. Upon notice that the parties reached a full settlement, the ALJ granted PECO's request to establish a filing date of February 24, 2026, for the Joint Petition, Statements in Support, and revised Phase V Plan.

II. SETTLEMENT TERMS AND CONDITIONS.

The City and PEA reviewed PECO's filing and submitted direct testimony on January 20, 2026: City/PEA Statement No. 1, the Direct Testimony of Alon Abramson. The testimony of the City and PEA witness Alon Abramson, and all exhibits and Mr. Abramson's verification, were entered into the record at the evidentiary hearing on February 2, 2026. The terms and conditions of the Settlement satisfactorily address many of the issues raised in the City and PEA's testimony. The City and PEA recognize that this Settlement contains modifications from the original recommendations proposed by the City and PEA, however, the agreed-upon Settlement achieves a fair resolution of the many complex issues raised in this proceeding. For these reasons, and those that are discussed in greater detail below, the City and PEA submit that the Settlement is in the public interest and should be approved by the Commission, without modification.

A. Comprehensiveness / Deeper Savings

City and PEA witness Abramson raised concern in his direct testimony that the term "comprehensive" as used in PECO's EE&C Plan was used so broadly as a label that it departed from the Commission's emphasis in its Phase V Implementation Order where "[t]he Commission emphasized that comprehensive programs should reflect a deliberate mix of measures to address multiple end uses, leverage lessons from Phase IV, and meaningfully advance whole-building or system-level efficiency for both residential and non-residential customers."⁴ Witness Abramson testified that PECO's EE&C Plan inappropriately labeled nearly all individual measures, including

⁴ City/PEA Statement No. 1, p. 21.

single end-use, low-cost, or standalone measures like LED bulbs, aerators, showerheads, appliance recycling, and plug-load devices, as “comprehensive” measures.⁵ As for the Home Energy Reports (HERs) component of PECO’s EE&C Plan, witness Abramson testified that PECO should reduce its reliance on such a measure because, although they have strong cost-effectiveness metrics, they are behavioral savings that may not materialize or last in comparison to deeper efficiency investments.⁶

Under the terms of the Settlement, PECO has agreed to revise Table 8 and Table 20 in the Plan to reflect the measures identified in the residential comprehensive measure list issued by the Commission in their Phase V plan template tables; reduce the share of non-residential savings attributed to lighting measures from approximately 44 percent to approximately 40 percent and reallocate funds related to that reduction to non-lighting strategies; reallocate \$2 million of non-comprehensive low-income program funds to comprehensive low-income funds; and draft a program strategy and approach to promoting projects that include two or more comprehensive measures for installation.⁷ As for the HERs, PECO has committed to leverage usage-based targeting approaches and emphasize comprehensive measures, including targeted messaging related to building envelope improvements, heating and cooling upgrades, and participation in other Act 129 programs offering deeper savings options, in its outreach efforts.⁸

The provisions of the Settlement addressing the “comprehensive” and deeper savings within PECO’s EE&C Plan are in the public interest because they provide means for further savings to come from longer lasting measures for customers throughout the duration of Phase V.

B. Low-Income Sector

⁵ *Id.* p. 21-22.

⁶ *Id.* pp. 17-18.

⁷ Settlement ¶¶ 11-14.

⁸ Settlement ¶ 15.

City and PEA witness Abramson testified that the Health and Safety investment component of PECO's proposed EE&C Plan is unlikely to be impactful in the housing stock served and may also limit participation or fall short of the stated goals of the Low-Income program within the EE&C Plan.⁹ As Mr. Abramson explained, and PECO recognizes in its EE&C Plan, unresolved health and safety conditions are a primary driver of deferrals within low-income energy efficiency programs because energy efficiency measures cannot be safely or effectively installed in many homes without first addressing underlying hazards.¹⁰ Therefore, Mr. Abramson recommended that PECO increase significantly the \$1,000 per home Health and Safety cap based on observed remediation costs in the low-income housing stock, particularly in older urban homes; clarify in the EE&C Plan how frequently Health and Safety needs are expected to exceed the proposed cap and how those cases will be resolved without deferral; and consider increasing the Health and Safety budget or adopting a tiered or flexible per home allowance that better reflects the variability and severity of conditions encountered. Mr. Abramson also testified that "PECO's Phase V Residential Low-Income Subprogram places a disproportionate emphasis on low-cost, high-volume measures such as lighting, kits, plug-in devices, and incremental or behavioral interventions, while allocating a comparatively small share of savings and participation to comprehensive upgrades."¹¹ He continued, in his testimony, that "[t]his imbalance is further reflected in participation levels" as "PECO projects hundreds of thousands of kit and plug-load distributions, compared to fewer than 6,000 homes receiving air sealing or major shell work and fewer than 2,000 homes receiving high-efficiency HVAC upgrades over the entire Phase." *Id.* at 14-15. Mr. Abramson thus concluded that PECO's EE&C Plan should increase the share of

⁹ City/PEA Statement No. 1, p. 8.

¹⁰ *Id.* p. 9.

¹¹ City/PEA Statement No. 1, p. 14.

funding, participation, and savings attributable to shell, HVAC, and water heating measures, supported by adequate health and safety remediation, particularly for low-income households, which typically face higher energy burdens and poorer housing conditions that require deeper interventions to achieve lasting benefits. *Id.*

Under the terms of the Settlement, PECO removed the standard per-household cap on health and safety spending and, instead, will assess health and safety needs on an individual basis while considering the available Phase V Health and Safety budget.¹² This term is in the public interest because strengthening the Health and Safety component of the Residential Low-Income Subprogram by removing the \$1,000 per customer cap will improve participation, reduce deferrals, and better align PECO's Phase V plan with the Commission's goals of equitable, comprehensive energy efficiency service delivery. Additionally, PECO has committed to enhancing its efforts to successfully attract low-income customers to a wider range of its Act 129 programs. In terms of outreach, PECO has committed to incorporate energy efficiency education into existing Customer Assistance Program ("CAP") outreach events to generate awareness about Act 129 and other PECO assistance programs¹³ as well as develop targeted messaging to low-income customers to increase participation at appliance recycling drop-off and pick-up events (if PECO obtains a suitable vendor to provide pick-up services).¹⁴ The proposed Settlement also includes commitments from PECO to inform confirmed low-income customers about the availability and benefits of a Free Energy Check-Up and also to facilitate audit scheduling for customers who affirmatively opt in.¹⁵ PECO will also include information about both Appliance Recycling and examples of the no-cost measures available through the Free Energy Check-Up, including tailored

¹² Settlement ¶ 22.

¹³ Settlement ¶ 16.

¹⁴ Settlement ¶ 18.

¹⁵ *Id.*

messaging for low-income customers to highlight the benefits of energy assessments and potential energy efficiency measures (subject to the unique characteristics of the home), in all print and/or email marketing materials and seek input from the parties of this Settlement on the materials before they are distributed to customers.¹⁶ PECO will also add information to the existing CAP Maximum Credit Notification letters sent to CAP customers about how customers can access PECO's website to obtain information regarding Act 129 energy efficiency measures available to low-income customers, under the terms of the proposed Settlement. Regarding the Low-Income HER program, PECO has agreed to refrain from counting savings generated by the program towards the Phase V low-income carveout.¹⁷ PECO has also committed to coordinating with Community-Based Organizations in PECO's service territory to provide training and materials regarding Act 129 low-income program offerings.¹⁸

These enhanced provisions of PECO's EE&C plan in the proposed Settlement are in the public interest as they are designed to further attract PECO's low-income customers to the available and most meaningful saving opportunities under Act 129. The City and PEA support the Low-Income Sector provisions of the proposed Settlement.

C. Coordination, Tracking and Data Collection, Data Sharing and Stakeholder Engagement

In his direct testimony, City and PEA witness Abramson testified that PEA and the City coordinate with PECO on several home repair programs, including Built to Last, the H.O.M.E. Initiative, WAP, and others.¹⁹ Witness Abramson further testified that PECO acknowledged, in its filed EE&C Plan, the importance of such coordination and made some commitments to exploring

¹⁶ Id.

¹⁷ Settlement ¶ 17.

¹⁸ Settlement ¶ 19.

¹⁹ City/PEA Statement No. 1, pp. 5-6.

collaboration to expand reach, integrate resources, and improve customer results.²⁰ While in support of these statements and commitments from PECO, witness Abramson continued to testify that, through his experience, these home repair programs would really be improved if the EE&C Plan included specificity and accountability to meaningfully effectuate PECO's stated coordination intentions.²¹ By specificity and accountability, witness Abramson suggested that the EE&C Plan include clear project level commitments from PECO regarding which Act 129 measures will be installed, guidance from PECO to its conservation service providers on engaging with the home repair participants, and commitments to coordination around scheduling home repair activities, energy assessments, and measure installation.²²

In settlement, the parties agreed on terms to address the coordination concerns of witness Abramson by designating at least one staff-level coordination lead to maintain coordination and referrals with external home repair, weatherization, and energy efficiency programs operating in PECO's service territory.²³ Additionally, PECO has committed to establishing a written coordination framework for interactions between PECO's low-income and residential Act 129 programs, managed by PECO's CSPs) and, including but not limited to, the Philadelphia Housing Development Corporation, Philadelphia Energy Authority, any other agencies implementing the City of Philadelphia HOME plan, and weatherization/home repair agencies in PECO's service territory ("Act 129 Coordination Partners").²⁴ According to the Settlement, "...[t]he framework shall, at a minimum, address: data sharing (both method and types of data), customer privacy, communication and follow-up protocols, coordination within the Act 129 framework or

²⁰ Id.

²¹ Id. at 6.

²² Id.

²³ Settlement ¶ 23.

²⁴ Settlement ¶ 24.

sequencing of Act 129 and external program measure implementation with consideration given to the number of provider visits to enter a customer home, opportunities to braid funding sources, dispute resolution protocols, discussion of other potentially applicable external programs, and a pathway for negotiated agreements between PECO and Act 129 Coordination Partners.”²⁵ PECO has also committed to convening a coordination collaborative with interested stakeholders and allow stakeholders to provide feedback on the draft coordination framework.²⁶ Once the framework is implemented, PECO has committed to tracking referral data points to share with stakeholders at the biannual meeting and with the Commission.²⁷ Finally, under the Settlement, PECO will dedicate time during the biannual stakeholder meeting to review the performance of the coordination framework.²⁸

The City and PEA find the coordination and data tracking provisions of the proposed Settlement to be in the public interest as they amount to meaningful steps towards active and effective coordination between PECO, its CSPs, and the Act 129 Coordination Partners to make progress towards enhanced and more cost-effective implementation of home repair programs for customers.

D. Low-to-Moderate Income and Multi-Family Sectors

Under the terms of the Settlement, PECO will dedicate \$1 million from its total Plan Residential Research and Development budget to a low- to moderate-income pilot, targeting energy efficiency opportunities within that specific customer segment (151%-250% of the Federal Poverty Level).²⁹ During the pilot, PECO will identify and track implementation of comprehensive

²⁵ Settlement ¶ 24.

²⁶ Settlement ¶ 25-26.

²⁷ Settlement ¶ 27.

²⁸ Settlement ¶ 28.

²⁹ Settlement ¶ 30.

efficiency measures to these customers while advancing its overall energy savings goals for up to 24 months.³⁰ Thereafter, PECO will analyze the results of the pilot and present pilot findings to PECO Act 129 stakeholders and discuss any recommended changes to energy efficiency offerings in PECO's Phase V Plan because of the pilot findings, including consideration of expanding the pilot and funding for the targeted customer group if the pilot demonstrates positive performance and there is available budget in the program.³¹ In addition, PECO has committed to requiring its CSPs to collect multi-family housing information while implementing Phase V programs. PECO will track multi-family participation and savings by measure, program, and income segment (low-income and non-low income), where feasible, in order to facilitate the specific targeting of multi-family properties and future Act 129 EE&C marketing strategies of that customer segment. Such data will be kept in a repository and shared with stakeholders at the biannual Act 129 EE&C stakeholder meetings.³²

These provisions of the proposed Settlement are supported by the City and PEA and in the public interest because they improve data collection and tracking of Act 129 measures for low- to moderate income and multi-family housing customers to ultimately deliver more savings to those groups in the long run.

E. Additional Enhancements

To further enhance its Act 129 program, PECO has committed to several additional provisions in the proposed Settlement. Notably, PECO has committed to actively participate in the ongoing Act 129 Data Sharing Working Group established by the Commission and work with stakeholders to arrive at a common strategy and process for data sharing under Phase V.³³ PECO has also

³⁰ Id.

³¹ Id.

³² Settlement ¶ 31.

³³ Settlement ¶ 32.

committed to continuing to collaborate with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters and reach out to the Energy Coordinating Agency and any other existing programs in PECO's service territory that provide heat pump training to provide an opportunity to include them in any discussions.³⁴ PECO will also develop, implement, and maintain a formal process to ensure that all customers and prospective customers seeking interconnection are informed of available Commission-approved Act 129 programs and share a report on the processes implemented to inform interconnection applicants of Act 129 programs with stakeholders at the biannual stakeholder meetings.³⁵

The City and PEA find these Settlement provisions to be in the public interest as they target areas of Act 129 program improvement and increased program collaboration.

³⁴ Settlement ¶ 33.

³⁵ Settlement ¶ 35.

III. CONCLUSION

The City and PEA respectfully request that the Honorable ALJ Marta Guhl and the Pennsylvania Public Utility Commission approve the foregoing Joint Petition for Settlement without modification.

Respectfully submitted,

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Dated: February 24, 2026

STATEMENT G

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**STATEMENT OF THE KEYSTONE ENERGY EFFICIENCY ALLIANCE IN SUPPORT
OF JOINT PETITION FOR FULL SETTLEMENT**

The Keystone Energy Efficiency Alliance (KEEA), one of the signatory parties to the Joint Petition for Approval of Full Settlement (Joint Petition), finds the terms and conditions of the Settlement to be in the public interest, and therefore respectfully requests that the terms and conditions of the be approved by the Honorable Administrative Law Judge Marta Guhl and the Pennsylvania Public Utility Commission without modification.

I. INTRODUCTION

On December 1, 2025, PECO Energy Company (PECO) filed its Petition for Approval of its Phase V Energy Efficiency and Conservation (EE&C) Plan at the above-captioned docket. KEEA intervened in this proceeding to ensure that PECO's Phase V EE&C Plan is appropriately designed to provide meaningful, cost-effective energy efficiency measures. KEEA actively engaged in settlement negotiations with the other parties, and the proposed settlement adequately addresses the concerns raised in the direct testimony of Jeaneen Zappa.

II. SETTLEMENT TERMS

KEEA negotiated several important provisions presented in the Joint Petition that will improve the effectiveness of PECO's EE&C programs.

First, PECO has agreed to not impose a per-household cap on health and safety spending for its Act 129 program in Phase V. Health and safety remediation is essential to enabling

effective weatherization upgrades for low-income customers, who are often deferred from such programming due to the condition of their homes.

Second, PECO has agreed to collaborate with the Electric Association of Philadelphia to convene a training program for local contractors focusing on heat pumps and heat pump water heaters. Ensuring that the workforce is properly trained and educated on the latest technologies is critical to achieving positive outcomes in overall energy savings.

Finally, PECO has agreed to establish a written coordination framework governing interactions between PECO's residential and low-income Act 129 programs, Act 129 Coordination Partners, and Service Providers. Crucially, PECO has agreed that this framework will address, *inter alia*, data sharing, coordination of Act 129 programming with external program measure implementation, and opportunities to braid funding. This coordination is key to achieving truly effective energy savings in the most cost-effective manner possible.

III. CONCLUSION

For the reasons set forth in the Joint Petition, as well as those set forth in this statement, KEEA supports the proposed Joint Petition and respectfully requests that the Administrative Law Judge and the Commission approve the Joint Petition in its entirety.

Respectfully submitted,

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