
Megan E. Rulli
Associate

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 207296

September 30, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

Enclosed for filing on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) is the Proposed Peak-Time Rewards Pilot for Residential Customers program (“Pilot”) for the Company’s Phase V Energy Efficiency and Conservation (“EE&C”) Plan. The Company’s Phase V EE&C Plan, as approved by the Commission on March 26, 2026, contains information on the Pilot’s design, hypotheses being tested, budget, and savings estimates, in line with the Commission’s Final Implementation Order issued June 18, 2025, at Docket No. M-2025-3052826. The Implementation Plan contains supplemental details regarding the Pilot that are being provided at the request of the Commission’s Bureau of Technical Utility Services.

Copies of this filing will be provided as indicated on the enclosed Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/sll

Matthew L. Homsher, Secretary
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Enclosures

cc: Amy E. McMullen, Bureau of Technical Utility Services (*via email, w/ attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

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

VIA E-MAIL

Elizabeth R. Marx, Esquire
Levi A. Phillips, Esquire
Ria M. Pereira, Esquire
Lauren N. Berman, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Judith D. Cassel, Esquire
Micah R. Bucy, Esquire
Kathryn Read-Fisher, Esquire
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
jdcassel@hmslegal.com
mrbcy@hmslegal.com
kcr@hmslegal.com
Counsel for SEF

Steven C. Gray, Esquire
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for CEO

Katie Kennedy, Esquire
Janna E. Williams, Esquire
Johnathan M. Longhurst, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Building, 5th Floor
Harrisburg, PA 17101-1923
kkennedy@paoca.org
jwilliams@paoca.org
jlonghurst@paoca.org
OCAPhaseVPPL25@paoca.org

Justin L. Carpenter, Esquire
Keystone Energy Efficiency Alliance
614 South 4th St., #307
Philadelphia, PA 19147
jcarpenter@keealliance.org
Counsel for KEEA

Adeolu A. Bakare, Esquire
Victoria A. Geddis, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
vgeddis@mcneeslaw.com
Counsel for PPLICA

Date: September 30, 2026



Megan E. Rulli

Proposed Peak-Time Rewards Pilot for Residential Customers

PPL Electric Utilities Act 129: Phase V Residential Persistent Peak Demand Pilot

Executive Summary

PPL Electric Utilities (“Company”) will launch a behavioral daily load shifting pilot (“Peak-Time Rewards Pilot”) to test whether a flat, seasonal rebate motivates residential customers to adopt behavioral daily load shifting, moving electric usage away from Company defined daily peak periods to achieve persistent peak demand reduction. Unlike the Company’s existing load control offerings, the pilot does not rely on utility-controlled devices or on daily dispatched events. Instead, participating customers receive a rebate for verified reductions in their own peak-period usage, measured through AMI interval data and validated by the Company’s third-party evaluator. The pilot will be implemented by CLEAResult, the Conservation Services Provider (“CSP”) in accordance with the Company’s approved Phase V EE&C Plan.

The pilot is proposed as an up to two-year, four-season offering beginning June 1, 2027, in alignment with the start of Program Year 19 (PY19). It is intended to determine whether a flat rebate can produce measurable and persistent peak demand reduction from residential customers acting on their own, and to inform future program offerings, including an expanded peak-time rebates offering..

This pilot plan is provided to describe the proposed pilot structure, customer offering, delivery approach, and evaluation plan, in advance of customer-facing implementation. The pilot plan provides detail on the authorized pilot as part of the Company’s approved Phase V EE&C Plan, described within section 3.2:

Peak Time Rebates (Behavioral Demand Response) Pilot – PPL Electric Utilities may allot up to \$1 million for a Peak Time Rebate (“PTR”) demand response pilot for residential customers. The objective of the pilot is to test the effectiveness of a static, seasonal rebate with a performance bonus. A key research question is to understand if a PTR can encourage residential customers to shift energy usage away from peak periods during both summer and winter seasons. Metrics to be tracked include customer enrollment by season, customer performance by appliance or equipment, attrition rates, and overall peak demand impacts. The pilot may last up to 24 months, though the start date may occur after the start of Phase V.

Pilot Purpose

Most peak-time rebate offerings in the market today are event-based, where a utility calls a limited number of events per season, notifies participants a day ahead, and measures performance against a baseline for those specific hours. This pilot instead establishes fixed daily peak windows that apply across the full season, targeting persistent peak demand reduction through sustained daily load shifting rather than reduction on a handful of called event days. The customer experience is closer to a time-of-use rate, but the

offering is delivered as a rebate rather than as a rate change, which allows the concept to be tested in alignment with Act 129.

As customers respond to a daily window rather than to a called event, sustained engagement is the central design consideration and the primary driver of delivery cost. In a load control program, the program relies on scheduled dispatch. In this pilot, customer education, seasonal reminders, and a consistent email cadence are the primary methods to encourage load shifting. The outreach and engagement approach described in this proposal is therefore a core element of pilot delivery rather than a supporting activity.

Pilot Structure

The pilot is structured as a multi-activity behavioral offering. Any electric end-use a customer can reasonably shift outside the daily peak windows contributes toward performance, including cooling and heating, laundry, dishwashing, cooking, electric vehicle charging, pool pumps, and water heating. Wi-Fi-enabled smart thermostats are among the most effective tools available to a participating customer, and the target audience is defined in part by thermostat ownership. The pilot is not a thermostat program, however, and would not be marketed as one.

Key pilot parameters are summarized below and described in the sections that follow:

- **Pilot term:** Two years, four seasonal performance periods, beginning June 1, 2027 and concluding May 31, 2029
- **Enrollment target:** Up to 3,000 residential households
- **Customer incentive:** \$10 upon enrollment, plus either \$20 or \$30 per season based on verified performance
- **Budget:** Up to \$1,000,000 for all pilot costs
- **Measurement:** Net seasonal peak demand reduction determined from AMI interval data by the Company's third-party evaluator following the close of each season
- **Delivery:** CSP is responsible for marketing, enrollment, customer education, ongoing engagement, customer support, and incentive payment

Two exclusions shape the eligible population. Customers with devices utilized in the thermostat daily load shifting channel are excluded to avoid overlapping treatment and double-counted savings. Resource Constrained Energy Efficiency Program customers are excluded from the initial pilot population to maintain a clearly defined market-rate test group and avoid layering a separate behavioral intervention onto customers already receiving education and services tailored to income-eligible households. This limited pilot exclusion is intended to support coordinated customer outreach and a more clearly defined evaluation population; it does not reflect a determination that income-eligible customers could not benefit from a future peak-time rewards offering. Both exclusions reduce the addressable pool and are reflected in the outreach effort and marketing investment required to reach the enrollment target.

Pilot Design

Target Audience and Eligibility

The pilot targets residential, market-rate customers who demonstrate historically high energy usage, are likely to have central air conditioning and/or electric primary space heating, and therefore have the most shiftable load and the greatest potential for measurable reduction. Eligible customers would meet the following criteria:

- Active Company residential electric account with an AMI meter and interval data available
- Market-rate residential customer; Resource Constrained (income-qualified) customers are excluded
- Wi-Fi-enabled smart thermostat in the home is a preferred characteristic, though not required; devices will be excluded if they are participating in the Thermostat Optimization daily load shifting channel.
- Not enrolled in a conflicting load control or peak demand offering

Seasonal Peak Periods

The pilot would operate across two seasonal performance periods in each active program year in alignment with the Company's established persistent peak demand seasons. Within each season, fixed daily peak windows would apply on weekdays, excluding holidays. Seasonal dates and daily peak windows are shown in the table below.

Table 1. Seasonal Peak Periods

Season	Season Dates	Daily Peak Window
Summer*	June 1 through August 31	4:00 to 7:00 p.m.
Winter*	January 1 through February 28 (February 29 in leap years)	6:00 to 9:00 a.m. and 6:00 to 8:00 p.m.

**Seasonal program periods will exclude weekend and holidays, which included July 4th, Juneteenth, New Year's Day, Martin Luther King Jr. Day and Presidents Day.*

Across the two-year pilot term, the seasonal performance periods would be:

- Summer 2027: June 1 through August 31, 2027
- Winter 2028: January 1 through February 29, 2028
- Summer 2028: June 1 through August 31, 2028
- Winter 2029: January 1 through February 28, 2029

The winter season includes both a morning and an evening peak window, which represents a greater daily behavioral commitment for two months versus the single summer window that will cover three months. Customer education and seasonal reminders would place additional emphasis on the winter periods for this reason, and seasonal performance would be evaluated separately for summer and winter so that any difference in customer response between the two seasons can be observed.

Enrollment and Onboarding

Marketing and enrollment would begin in January 2027, approximately five months ahead of the PY19 launch, so that an adequate participant population is in place before the first season begins. Recruitment would run January through May 2027, with rolling enrollment thereafter as capacity allows.

Enrollment would proceed as follows:

- The customer submits an enrollment request through a Company enrollment platform or a CSP-hosted online enrollment form
- CSP verifies account eligibility against Company customer data, confirms the customer is not excluded based on established eligibility criteria and validates the mailing address to be used for incentive payment
- CSP issues an enrollment confirmation stating that the \$10 enrollment incentive has been earned and will be paid with the first seasonal payment
- CSP delivers a welcome package containing the seasonal peak window calendar, load-shifting guidance, and the expected timing of the first incentive payment

Enrollment volume, attrition, and acquisition source would be tracked throughout the pilot and reported by the Company as part of its Annual Report.

Roles and Responsibilities

Delivery responsibilities are shared by the Company, CSP, and the Company's third-party evaluator. The CSP determines which households qualify for an incentive and at what tier based on performance data; CSP applies that determination and issues payment.

Table 2. Roles and Responsibilities

Activity	CSP	Company	Evaluator
Marketing, collateral, and outreach	Lead	Review and approve	
Enrollment platform and customer verification	Lead	Enrollment tile, customer data	
Customer education and onboarding	Lead	Review and approve	
Ongoing seasonal notification and reminders	Lead		
Customer support	Lead		
AMI interval provision data	Lead	Receives	Receives
Initial Seasonal AMI analysis and kW determination	Lead	Provide data	
Incentive tier determination by household	Apply	Approve	Lead
Incentive payment to customers	Lead	Fund through pilot budget	

Activity	CSP	Company	Evaluator
Program reporting and data uploads	Lead	Receive	
Evaluation plan and methodology	Support	Approve	Lead

Customer Incentives

The proposed incentive structure reflects values necessary to support enrollment, given the reduced eligible population and the fact that participation requires ongoing effort from the customer rather than a one-time action. The recommended structure can be found in Table 3. Proposed Customer Incentive Structure.

Table 3. Proposed Customer Incentive Structure

Incentive	Amount	Trigger	Frequency
Enrollment	\$10	Verified enrollment and eligibility confirmation	One time, paid with the first seasonal payment
Seasonal performance	\$20	Verified net seasonal peak reduction greater than 0.0 kW	Per season, up to four
Seasonal performance bonus	\$30	Verified net seasonal peak reduction of 0.10 kW or greater	Per season, up to four

Seasonal incentives are structured as either/or rather than stacked. A household would earn either \$20 or \$30 in a given season, not both. A customer achieving the bonus threshold in both seasons would receive \$70 in the first year (\$10 enrollment plus \$30 plus \$30) and \$60 in the second year, for a maximum of \$130 across the full pilot. Customers will retain their enrollment incentive in the event no savings performance is noted and will be notified via email of their performance status.

Incentive Payment Approach

The enrollment incentive is earned at the point of verified enrollment but would be paid together with the first seasonal payment rather than as a separate payment during the recruitment window. Combining the two reduces the number of individual payments issued, lowers fulfillment cost, and gives the customer a single, larger check at the end of the first season. Seasonal incentive payment follows the CSPs seasonal analysis rather than the close of the season itself. Approximately 60 to 90 days would be allowed between the end of a season and customer payment, covering AMI data settlement, the evaluator analysis, incentive tier determination, and CSP payment processing. Incentives would be issued by CSP as a check mailed to the account holder of record, accompanied by a notification confirming the season, the performance tier achieved, and the amount paid. Because payment is delivered by mail, a valid mailing address would be captured and verified against Company account data at enrollment, and customers would be prompted to update their address if it changes during the pilot. Undeliverable and uncashed checks would be tracked, researched, and reissued where a corrected address can be confirmed.

Table 4. Estimated Incentive Payment Schedule

Payment	Performance Period	Evaluator Analysis	Target Payment
Summer 2027 seasonal, plus enrollment incentive	June 1 through August 31, 2027 (enrollment incentive earned January through May 2027)	September through October 2027	November 2027
Winter 2028 seasonal	January 1 through February 29, 2028	March through April 2028	May 2028
Summer 2028 seasonal	June 1 through August 31, 2028	September through October 2028	November 2028
Winter 2029 seasonal	January 1 through February 28, 2029	March through April 2029	May 2029

Outreach and Marketing

The pilot requires broad customer recruitment from a constrained eligible population. Reaching 3,000 enrolled households requires a sustained, multi-channel campaign beginning approximately five months before the first season.

Outreach Channels

Proposed outreach elements include:

- A dedicated pilot landing page hosted on the program website, with a vanity URL for use in customer-facing materials
- An online enrollment and rebate form, delivered as a Microsoft Forms submission or similar
- Digital advertising through Google Performance Max campaigns for broad awareness across the service territory
- Meta advertising, including an A/B-tested ad set in the first year and a second ad set launched later in the pilot informed by first-year results
- Targeted email campaigns to eligible customer segments, including re-targeting of customers who purchased eligible smart thermostats through the Company's Online Marketplace
- Coordination with Company customer communication channels (e.g., bill inserts, overarching corporate communication messaging) to build awareness among eligible customer segments
- Marketing materials, subject to Company review and approval

Specific outreach channels, messaging, and materials would be finalized ahead of the January 2027 launch and provided to the Company for review prior to deployment.

Customer Engagement and Email Cadence

The pilot includes 24 email deployments across the two-year term. Emails serve two purposes: acquisition during the recruitment window, and behavioral reinforcement once a customer is enrolled. Emails would be educational and would remind customers of the seasonal bonus opportunity. Consistent with the pilot design, emails would not report individual progress or savings attainment, which keeps the offering distinct from Home Energy Reports and preserves the integrity of the evaluation.

The deployment pattern within each cycle includes:

- Launch and awareness communication to a broad audience
- Online Marketplace thermostat re-targeting, limited to devices
- Spring reminder to a broad audience
- Final pre-season reminder to a broad audience
- Pre-season enrollee communication, including peak window confirmation and load-shifting guidance
- Late-start awareness communication targeting customers who have not yet enrolled
- Mid-season engagement reinforcing behavior and the bonus threshold
- Post-season communication setting expectations for evaluation timing and incentive payment

Customer Education

As the pilot depends on manual behavior change, customer education functions as the delivery mechanism in place of installed equipment. A customer who does not understand when the peak window occurs, or who disengages partway through a season, would not provide meaningful peak load shift. Education is therefore treated as a continuing activity throughout the pilot rather than a one-time onboarding step.

Education content would include:

- When the daily peak window occurs in each season, and how weekends and holidays are treated
- Specific, practical load-shifting actions presented across all electric end uses rather than focused on thermostats
- Pre-cooling and pre-heating strategies for customers with programmable or connected thermostats
- Shifting discretionary loads such as laundry, dishwashing, oven use, and electric vehicle charging outside the peak window

- How performance is measured and the difference between the base and bonus incentive thresholds
- Shifting load may not reduce their bill
- When and how incentives would be paid, that payment arrives as a mailed check combining the enrollment incentive and the first seasonal incentive, and why payment follows the evaluator analysis rather than the close of the season

A digital welcome package would be delivered at enrollment confirmation and would include a seasonal calendar the customer can retain and a plain-language explanation of the peak window.

Pilot Budget

The budget below reflects the 3,000-household enrollment scenario across the full two-year pilot term. Administrative and delivery costs are separated between startup activities and recurring annual costs, and between fixed and time-and-materials (T&M) fee types. The fixed monthly fee, calculated on the first-year cost, is approximately \$17,685 per month.

Table 5. Pilot Budget Summary

Budget Category	Startup	Annual	Two-Year Total
Administrative and delivery	\$142,180	\$212,220	\$566,620
Customer incentives			\$300,000
Total pilot budget			\$866,620

Table 6. Administrative and Delivery Budget Detail

Line Item	Year 1	Year 2	Two-Year Total	Fee Type
Pilot startup oversight and training	\$50,000		\$50,000	Fixed
IT setup: enrollment tile and verification engine	\$50,000		\$50,000	Fixed
Initial customer set up, enrollment and verification	\$37,500		\$37,500	Fixed
Marketing startup	\$4,680		\$4,680	Fixed
<u>Subtotal, startup</u>	<u>\$142,180</u>		<u>\$142,180</u>	
Program management: training, oversight, reporting	\$15,000	\$15,000	\$30,000	T&M
Customer enrollment portal: IT maintenance and licenses	\$6,000	\$6,000	\$12,000	Fixed
Seasonal review: evaluator coordination, payment processing, customer notification	\$31,250	\$31,250	\$62,500	T&M
Program team: customer support, reporting, coordination	\$18,750	\$18,750	\$37,500	T&M
Customer support (ICS)	\$31,000	\$31,000	\$62,000	Fixed
Marketing: labor, email, and digital advertising	\$110,220	\$110,220	\$220,440	Fixed
AMI performance Analysis	\$30,000	\$30,000	\$60,000	Fixed

Line Item	Year 1	Year 2	Two-Year Total	Fee Type
Subtotal, ongoing	\$212,220	\$212,220	\$484,440	
Total administrative and delivery			\$618,620	

Total estimated pilot CSP labor is approximately 6,473 hours across the two-year term.

Table 7. Marketing Budget Detail

Task	Labor Hours	Labor Dollars	Direct Cost	Total Cost
Meetings	220	\$26,400	\$0	\$26,400
Planning and reporting	75	\$9,000	\$0	\$9,000
Pilot marketing landing page	35	\$4,200	\$0	\$4,200
Rebate and enrollment form setup	4	\$480	\$0	\$480
Google Performance Max ads	49	\$5,880	\$25,000	\$30,880
Meta ads set 1, A/B test	60	\$7,200	\$25,000	\$32,200
Meta ads set 2	49	\$5,880	\$25,000	\$30,880
Emails, 24 deployments	755	\$90,600	\$0	\$90,600
Total marketing	1,247	\$149,640	\$75,000	\$224,640

Marketing figures cover the full pilot term. Of the 1,247 total hours, 39 hours represent marketing startup and the balance is ongoing campaign labor. Direct costs of \$75,000 represent digital advertising spend across the three campaign sets.

Table 8. Customer Incentive Budget

Component	Assumption	Payments	Rate	Total
Enrollment incentive	All enrolled households, one time, paid with first seasonal payment	3,000	\$10	\$30,000
Seasonal performance	75% of households achieve greater than 0.0 kW	9,000	\$20	\$180,000
Seasonal performance bonus	25% of households achieve 0.10 kW or greater	3,000	\$30	\$90,000
Total customer incentives				\$300,000

Seasonal payment counts assume four seasonal performance periods at 3,000 enrolled households. Applying the same performance distribution to peak demand reduction, the pilot savings planning assumption is approximately 225 kW of persistent peak demand reduction at full enrollment, based on 2,250 households at 0.05 kW and 750 households at 0.15 kW. Remaining pilot funding is available if performance exceeds savings assumptions, subject to the pilot budget cap.

Evaluation and Approval

This section describes the evaluation approach for the pilot in coordination with the Company's third-party evaluator and the Statewide Evaluator (SWE).

General Evaluation Approach

The full evaluation approach would be provided by the evaluator with the Company's review. The evaluation plan would be developed and confirmed ahead of the January 2027 marketing launch, so that recruitment criteria, enrollment data collection, and customer messaging align with the analysis requirements from the outset. The approach is expected to include:

- Baselines established using pre-enrollment consumption data and a matched comparison group of non-participants, with prior summer or winter season data used to support baseline construction where available
- Determination of total verified pilot performance
- Guidance on program interaction, including treatment of households also participating in Home Energy Reports or other offerings
- Customer acceptance and satisfaction measured through enrollment and seasonal surveys developed in coordination with the evaluator

Overlap with Home Energy Reports is not expected to affect the evaluation, as the pilot targets designated peak hours rather than overall consumption. The exclusion of daily load shifting devices addresses potential overlap with the Thermostat Optimization daily load shifting channel. It is worth noting that no other PA utilities have implemented a daily load-shifting peak-time rebate of this design; existing offerings are event-based or structured as a time-of-use rate, which is a consideration in developing the baseline methodology.

Pilot Data Tracking

Participating households would be identified by the CSP program at enrollment. Following each season, the evaluator's determination would be applied to each household and the resulting incentive payment tied to the corresponding enrollment record to support accurate verification and reporting. The pilot would track enrollment counts against target, attrition and withdrawals, the distribution of households across the base, bonus, and no-payment tiers, total net kW reduction, incentives paid by tier, and check issuance status including undeliverable and uncashed payments. Reported peak demand reduction would be calculated by the CSP and reported through the Company's database and tracking system, consistent with existing program practice.

During the January through May 2027 recruitment window, CSP would report enrollment progress weekly, moving to monthly reporting once the first season is complete. Monthly reporting would include enrollment counts, attrition, email deployment and engagement metrics, digital advertising performance, landing page traffic and conversion, and customer support volume with recurring themes.

EDC Annual Report

Reporting elements for the annual report would be established through development of the evaluation plan. Initial data elements under consideration include:

- Seasonal verified kW reduction with averages and ranges by season
- Participation and savings by incentive tier established by the CSP
- Enrollment and seasonal survey results, including process and qualitative findings as guided by research objectives

Pilot Timeline

The timeline below reflects a proposed pilot launch aligned with Program Year 19 (PY19), beginning June 1, 2027. Milestones have been planned with PY19 as the target launch date. Dates are approximate and subject to change as pilot design and stakeholder review proceed.

Table 9. Pilot Timeline

Date	Deliverable	Details
September 2026	Draft Pilot Proposal	CSP develops the detailed pilot proposal and aligns with the Company on pilot design.
September 2026	Company Review	Full draft provided to the Company for review and comment. Proposal shared with the Company's third-party evaluator to initiate the evaluation plan.
Late September 2026	Pa PUC Review	Finalized pilot plan provided to Pa PUC for awareness and review.
October 2026 – December 2026	Build and Approvals	CSP IT build for the enrollment tile and verification engine, landing page development, enrollment and rebate form setup, collateral development and Company approval, and corporate communications coordination.
December 2026	Evaluation Plan Finalization	The Company and evaluator finalize the evaluation methodology ahead of market launch.
January 2027	Marketing Launch and Enrollment Opens	Landing page live, digital advertising begins, email campaign launches, and enrollment opens.
January – May 2027	Customer Recruitment	Sustained campaign toward the 3,000 household enrollment target, with weekly enrollment reporting.
June 1, 2027	Pilot Launch (PY19)	Summer 2027 season begins and the first performance period is under way.
September – November 2027	First Seasonal Cycle	Evaluator analysis, incentive tier determination, and CSP incentive payment.
Ongoing (2027-2029)	Remaining Seasonal Cycles	Season, analysis, and payment cycle repeats for Winter 2028, Summer 2028, and Winter 2029.
May 31, 2029	Pilot Concludes	Final season closes.
Summer – Fall 2029	Final Reporting	Evaluator final report, and CSP final pilot report with findings and recommendations regarding scalability and future TOU structure.

Conclusion and Next Steps

This proposal outlines the structure, customer offering, delivery approach, evaluation plan, and budget for a proposed Peak-Time Rewards Pilot, with the explicit understanding that:

- Participation is voluntary and behavior-based; no equipment would be installed, and no customer device would be controlled by the Company or CSP
- Incentives would be paid by mailed check, and only for reductions verified by the Company's third-party evaluator
- The evaluation plan would be confirmed prior to the January 2027 marketing launch
- Savings would be in alignment with Act 129. No savings would be claimed outside of the applicable Phase V evaluation methodology

The pilot is intentionally structured as a time- and scope-limited offering, with seasonal review points across the two-year term prior to any consideration of expansion or modification. This approach provides a measured pathway to evaluating a behavioral peak-time rebate as a daily load-shifting tool for residential customers while preserving optionality for future program offerings.