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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Act 129 Energy Efficiency and Conservation Program Phase Two	:	Docket No. M-2012-2289411

COMMENTS OF THE KEYSTONE ENERGY EFFICIENCY ALLIANCE
TO SECRETARIAL LETTER REGARDING THE DESIGN AND IMPLEMENTATION OF
ANY FUTURE PHASE OF ENERGY EFFICIENCY and CONSERVATION PROGRAMS UNDER ACT 129

I. Introduction

On March 1, 2012, the Pennsylvania Public Utility Commission ("PUC" or "Commission") released a Secretarial Letter seeking comments on future energy efficiency and conservation ("EE&C") planning issues under Act 129 of 2008. Under Act 129, the PUC is required to set new incremental consumption and peak demand reductions ("DR") for the electric distribution companies ("EDCs") subject to the law if the PUC finds that Phase One of Act 129 was cost-effective.

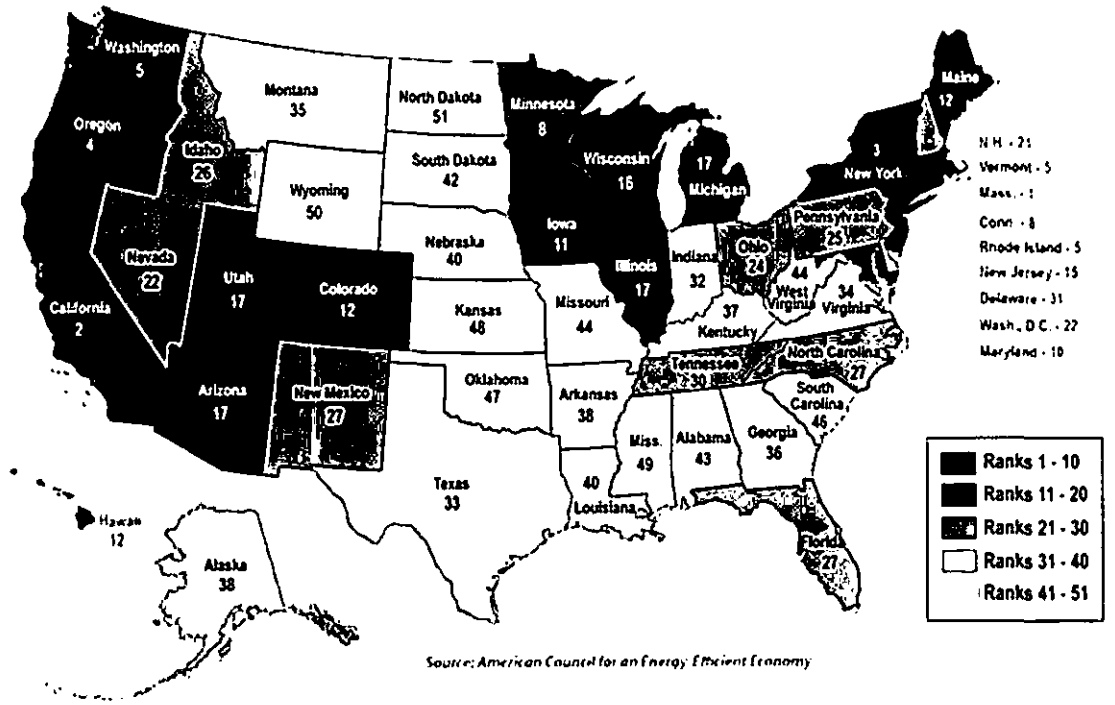
The Keystone Energy Efficiency Alliance ("KEEA"), a nonprofit trade association made up of over fifty six energy efficiency and demand response companies and organizations, greatly appreciates the opportunity to submit comments to the PUC on these issues. KEEA is grateful that the PUC has chosen to initiate proceedings to ensure a smooth and coordinated transition from the initial phase of Act 129 to a new phase. KEEA is confident that the PUC will find that Phase One of Act 129 was cost-effective and will initiate Phase Two.

Act 129 has been successful to date in beginning to deploy energy efficiency and demand response on a large scale statewide to benefit all classes of electric utility customers. A recent study by Optimal Energy Inc. finds that by lowering the state's electric load by 2,073 gigawatt-hours (GWh) in its first two years, the Electric Distribution Companies' (EDCs)

programs will save customers approximately $278 million each year, about $8 for every dollar invested. [1]

Act 129's job creation impacts are also considerable. The American Council for an Energy Efficient Economy (ACEEE) estimates that in its first year, Act 129 created between 400 and 600 new full time jobs across the state, and that by the end of next year, the number of jobs created as a result of the programs will exceed 1,500.

Given that Act 129 represents the first large scale statewide EE&C and DR effort, the results to date have surpassed expectations. Customer bills are lower, jobs have been created, and emissions are lower across the Commonwealth. However, even with this success, Pennsylvania scores in the middle of states in the most recent ACEEE 2011 energy efficiency scorecard: 25th out of 50. There is far more energy efficiency to be tapped, and KEEA is dedicated to helping boost the Commonwealth into the ranks of the top-rated states.



Source: American Council for an Energy Efficient Economy

[1] Optimal Energy, *Pennsylvania 2013-2018 Energy Efficiency Goals*, December, 2011, page 2.

II. Comments

1. Planning Timeline

KEEA endorses the planning timeline set forth in the Secretarial Letter, with minor adjustments. In addition to the listed milestones, KEEA recommends that the Commission schedule an opportunity for the PUC to learn about best practices from commissions and stakeholders from other states that have been meeting energy efficiency and demand response goals for much longer than Pennsylvania has. The Commonwealth is making great progress toward becoming a leader in energy efficiency nationwide. But states such as California, Vermont, Massachusetts, New York, and Oregon have valuable experience from decades of program implementation, and commissioners, state officials, utility representatives, energy efficiency practitioners, and evaluators have expertise that would be useful and applicable as the PUC considers the future phases of Act 129. In particular, these states can provide important insight into deeper savings per customer, deeper overall savings, higher participation levels from small commercial customers, more robust schools programs, and more accurate cost-benefit measurement. Inviting an array of experts to share best practices would be instructive and helpful to all parties involved in Phase Two of Act 129.

KEEA respectfully suggests two changes:

1.) Release the reports from the statewide evaluator's baseline study and the market potential study prior to May 10. This way, commenters will have the opportunity to review the reports prior to filing comments to the Tentative Order, also scheduled for May 10.

2.) Develop an Interim Order for Demand Response (DR) programs due to expire on May 31, 2012, since the deadline will occur prior to the commission's review of the final DR reports . Providing an Interim Order to continue DR will help eliminate programmatic interruption until the Statewide Evaluator has the opportunity to complete its analysis under Phase I. Taking this action could avoid market interruptions of basic DR programs that are commonly thought to be cost effective. Programmatic fits and starts add costs, cause customer confusion, risk loss of business and expertise, and loss of investment in demand resource infrastructure.

2. Length of Second EE&C Program

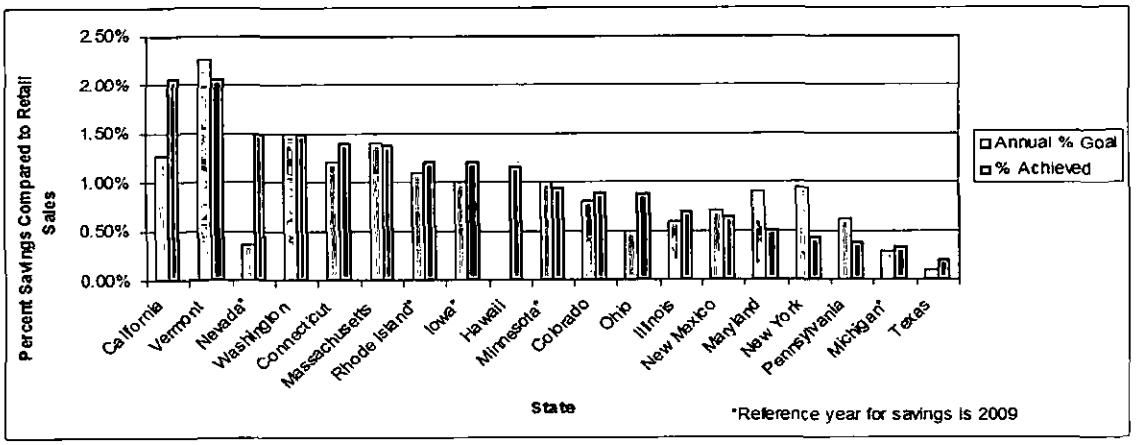
KEEA encourages the Commission to extend Act 129 for five (5) years until May 31, 2018. During that period, the Commission should require that EDCs meet intermediate savings and demand reduction targets. KEEA recommends the following schedule of savings goals during the 5 years of Phase Two: 2% by May 31, 2015, 4% by May 31, 2017, and 5% by May 31, 2018, for an average annualized energy savings of 1% from the original baseline of 2009. These additional energy savings in Phase Two would bring the total energy savings from Act 129 to 8% over a nine-year period from 2009 to 2018.

Future Act 129 Savings Goals

Utility	2009-2010 Sales (GWh)	2015 Goal (GWh)	% of Sales	2018 Goal (GWh)	% of Sales
Duquesne	14,085	282	2.0%	704	5%
Met-Ed	14,865	297	2.0%	743	5%
Penelec	14,339	288	2.0%	720	5%
Penn Power	4,773	95	2.0%	239	5%
PPL	38,200	764	2.0%	1,910	5%
PECO	39,385	788	2.0%	1,969	5%
West Penn	20,939	419	2.0%	1,047	5%
Total	146,646	2933	2.0%	7,332	5%

These goals are more modest than those recommended by the ACEEE in its April 2009 study, "Potential for Energy Efficiency, Demand Response in Pennsylvania," [2] which estimated that more than 30% of Pennsylvania's projected electricity, natural gas, fuel oil, and propane needs could be met through cost-effective efficiency measures widely available today. These goals will nonetheless help Pennsylvania harvest more of this valuable resource. The following chart compares Pennsylvania to other states that have adopted Energy Efficiency Resource Standards.

[2] ACEEE "Potential for Energy Efficiency, Demand Response, and Onsite Solar Energy in Pennsylvania" April 2009 page v.



The PUC should structure the goals so that the goals are a true minimum, rather than effectively being both a minimum and a maximum savings. The EDCs should be required to continue program spending after goals have been attained if the additional spending is on programs that have been demonstrated to be cost effective.

It is KEEA's assessment that the legislatively imposed spending cap of 2% of gross revenue per EDC[3] is a barrier to the higher annual savings targets recommended by ACEEE. KEEA believes that while the legislature apparently intended to protect consumers, initial results from Act 129 demonstrate that the cost cap is in fact an obstacle to greater consumer savings and that the Commission should advocate to lift the 2% spending restriction. The intent of Act 129 would be most effectively guaranteed if the utilities were incentivized to pursue all cost-effective energy efficiency, conservation, and demand response. As long as a cost-effectiveness test is applied to each utility's portfolio of programs, confirming that the benefits are greater than the investment, such a test is a de facto spending cap, and a 'second' cap is effectively redundant. It is fair to say that such a cap does not protect consumers but rather limits the amount of the cleanest and least-cost energy resource, thus forcing utilities to provide electricity from dirtier, higher-priced sources and exposing consumers to higher rates and greater risk.

Phase Two of Act 129 should last for at least five years in order to minimize administrative costs, enable utilities to bid energy efficiency into the PJM forward capacity market as a resource, and maximize the flexibility afforded EDCs in designing diverse EE&C

[3] Act 129, Section 2806.1 (G), formerly HB 2200

programs to meet their customers' needs. Longer EE&C programs will make it easier for utilities to achieve deeper energy savings and reach more of their customers. EDCs need the ability to establish flexible, innovative, yet simple, easy-to-use energy efficiency programs that target comprehensive energy savings. EDCs also deserve regulatory certainty as they design a diverse array of energy efficiency program offerings, and a five-year program will enable the Commission and the utilities to develop a *portfolio of* program offerings in a way that is fair to all stakeholders, especially the consumers. Further, the longer time frame would give programs adequate time to develop beyond the start-up phase and gain proper momentum and participation levels without annual delays and uncertainty. Many states opt for longer programs (see chart below).

State Program Features: Savings goals and timelines

State	Annual Savings Percentage	Cumulative 2020 Goal	Type	Length of Program
Arizona	1.75-2.5%	22.0%	Mandatory Standard	10 years
Arkansas	0.5-0.75%	1.5%	Mandatory Standard	3 years
California	0.92-1.27%	12.94%	Mandatory Standard	12 years
Colorado	0.76-1.68%	14.93%	Mandatory Standard	12 years
Delaware	0.75-4.0%	15.0%	Pending	7 years
Hawaii	1.5%	18.0%	Mandatory Standard	12 years
Illinois	0.4-2.0%	18.0%	Cost Cap	12 years
Indiana	0.3-1.99%	13.81%	Mandatory Standard	11 years
Iowa	1.0-1.4%	6.30%	Mandatory Standard	5 years
Maine	1.0-1.4%	5.0%	Mandatory Standard	4 years
Maryland	0.99-3.0%	16.7%	Mandatory Standard	7 years
Massachusetts	1.0-2.4%	26.1%	Mandatory Standard	12 years
Michigan	0.3-1.0%	10.55%	Cost Cap	12 years
Minnesota	1.5%	16.5%	Mandatory Standard	11 years
Nevada	0.05-0.77%	3.76%	Combined RES-EERS	11 years
New Mexico	0.74-0.86%	9.06%	Exit Ramp	11 years
New York	2.10-2.26%	15.25%	Mandatory Standard	7 years
North Carolina	0.21-0.38%	2.92%	Combined RES-EERS	11 years
Ohio	0.3-1.0%	12.13%	Exit Ramp	12 years
Oregon	0.8-1.0%	4.4%	Mandatory Standard	5 years
Pennsylvania	0.99-1.0%	2.98%	Cost Cap	3 years
Rhode Island	1.16-2.5%	10.26%	Mandatory Standard	6 years
Texas	0.10-0.5%	4.6%	Cost Cap	12 years
Vermont	2.25%	6.75%	Mandatory Standard	3 years
Washington	0.74-1.5%	17.24%	Mandatory Standard	12 years

In adopting a five-year program, the PUC should require frequent EDC reporting on the progress of each EE&C program. It is critical to the success of Act 129 that EDCs invest in energy efficiency on an on-going basis, without interruption. Any delay undermines the EDCs' ability to achieve their goals and presents added risks associated with program interruptions.

KEEA strongly encourages the PUC to adopt intermediate savings targets in order to encourage EDCs to diversify program offerings and to pursue short- and long-term savings. The recommended targets would be: 2% by May of 2015, 4% by May of 2017 and 5% by 2018. Any penalties and incentives should be applied at each of these intervals. Intermediate targets will also encourage EDCs to invest in programs that can lead to deeper energy savings, such as Home Performance with ENERGY STAR. Rather than permit an EDC to delay implementation of its EE&C programs, intermediate targets will ensure that EDCs move swiftly to roll out their programs to customers. Reporting will serve an important role in providing for transparency in Phase Two of Act 129, but intermediate targets with penalties for failing to meet them and incentives for exceeding them will give Phase Two the certainty necessary to insure the EDCs are on track.

3. Inclusion of a Demand Response Curtailment Program

KEEA encourages the Commission to adopt a clear and straightforward approach to any demand savings goal set forth in the extension of Act 129. EDCs should be required to report on a quarterly basis, as is the current practice, and the PUC should establish intermediate reduction targets that must be met at various points throughout the five-year period of Phase Two. Demand resources (DR), along with energy efficiency, should continue to reduce demand for each year of the Phase 2 programs, contribute to grid reliability, and reduce the need for costly new plant construction. Fourteen thousand one hundred eighteen (14,118) MW of DR has cleared the PJM auction for delivery by March, 2014. Demand reduction goals are required in several PJM states including Delaware, Illinois, Maryland and Ohio. The Commission could look to these states for examples of how to structure demand goals for Phase 2.

Demand reduction is a vital component of Act 129 and should be continued. As new technologies are introduced and greater understanding of customer benefits are known, DR will continue to provide benefits for customers. Even though large industrial customers may

participate voluntarily in DR, there remains a need for utilities to engage with demand response providers to expand participation in this area. If the Commission changes the 100-highest-hour peak demand requirement to a metric requiring a lower expenditure, KEEA urges the Commission to retain the budget levels so that more energy efficiency savings can qualify under the current restrictive budget cap.

4. **Aligning EDC Targets and Funding Using Dollars per MWh of Expected Reductions**

KEEA strongly encourages the PUC to maintain uniform savings and demand response targets across EDCs and to permit each EDC to spend the maximum allowable amount on its EE&C programs. Though the amount of funding available for each EDC's EE&C plan varied in Phase One of Act 129, that aspect of the program's design encouraged each EDC to strive for energy savings and to do so with a variety of program offerings. That is a valuable feature of Phase One of Act 129 that should be continued in Phase Two.

By artificially capping the EE&C budgets at a fixed amount per MWh instead of maintaining a uniform percentage goal across all utilities, the PUC would be freezing much of the innovation that Act 129 was designed to encourage. The legislature understood that each utility is different with regard to its revenue, its customer base, and its electric load. By setting a uniform target across all EDCs, the legislature demonstrated its preference that all EDCs be held to the same standard and that the EDCs actively pursue energy savings aggressively. Additionally, by permitting variations in the amount that each EDC could spend per MWh saved, the legislature permitted each utility to leverage all its resources to meet the targets in the way that works best for them and their customers.

There are numerous ways that can and should be pursued to reduce the cost of a kilowatt hour saved. Sharing best practices within the state and from leading states is a first step to strengthening program effectiveness and increasing efficiency. Coordination across utilities to develop statewide programs, statewide branding of efficiency, and statewide marketing can all reduce program costs. Inclusion of a wider range of behavioral approaches will also drive down program costs.

Permitting utilities to establish pilot programs that measure savings in MMBTUs, rather than strictly in kWhs, will also provide additional flexibility while enabling utilities to pursue deeper savings through whole building approaches.

5. Inclusion of a Reduction Target Carve-Out for the Government, Educational, and Non-Profit Sector

Act 129 requires that a minimum of 10% of the required reductions in energy consumption come from government, schools, hospitals, and nonprofits.[4] KEEA interprets the statute to require this carve-out, unless the legislature amends the statute. Even if the PUC had the authority to change the savings carve-out for this sector, KEEA believes that the Commission should continue to require a savings carve-out for this important and often underserved sector. The Commission should continue to require that EDCs achieve the required savings as a percentage of actual savings rather than a percentage of the budget. A budgetary carve-out alone would not ensure that this sector gets the desired results.

Within this sector, schools have been particularly hard hit by recent rounds of budget cuts. While some schools have taken advantage of Act 129 to reduce their energy bills, the vast majority have not. KEEA would recommend that the Commission encourage utilities to develop special approaches and programs that can increase participation of schools and increase the depth of their savings. One issue here is that the statewide evaluator has apparently not recognized energy savings from behavioral approaches in schools. All savings that can be measured and verified need to be counted. Behavioral approaches work extremely well in schools; additional financing may also be necessary for this sector.

Financing

Consumers' ability to finance the cost of energy efficiency measures is key to ensuring robust and sustainable EE&C programs. The Commonwealth has already invested in an efficient financing mechanism through the Keystone Home Energy Loan Program (Keystone

[4] 66 Pa.C.S. § 2806.1(b)(1)(i)(B)

HELP), considered by many in the industry to be one of the best residential energy loans in the country. KEEA recommends that the Commission encourage utilities to support the existing HELP loan mechanism that the Commonwealth has developed and leverage already invested public funds to coordinate with their own programs.

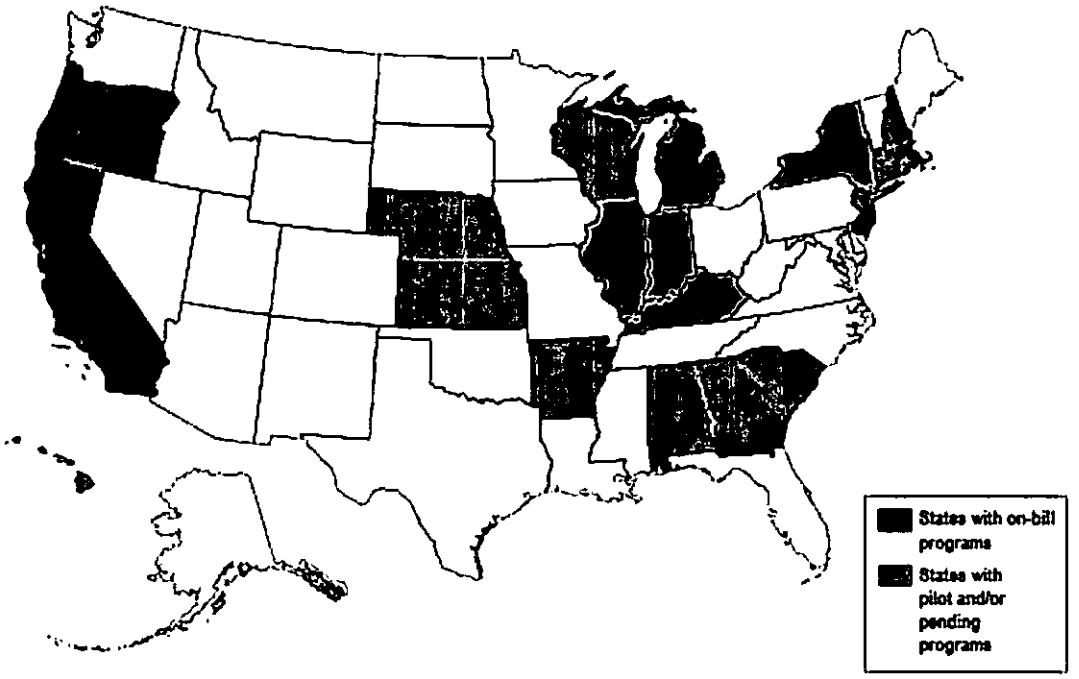
On-Bill Financing and On-Bill Repayment

On-bill finance (OBF) and on-bill repayment may be appropriate financing tools for the MUSH and other sectors. These programs assist property owners with financing the upfront costs of efficiency improvements, leveraging an electric or natural gas utility's unique relationship with their customers to provide convenient access to funding for energy efficiency investments.

"OBF allows utility customers to invest in energy efficiency improvements and repay the funds through an additional charge on their utility bill. ... Credit losses on both consumer and commercial utility bills tend to be far lower than for other obligations. If structured properly, an on-bill program can substantially reduce the cost of and improve access to financing. In many cases, energy savings are sufficient to cover the monthly payments for the financing so that the total monthly charge on utility bills is less than or equal to the pre-investment amount. This is known as 'bill-neutrality.'

On-bill programs have been piloted as early as 1993 (New London Resource Project, Wisconsin) but have recently seen a surge in popularity. Currently, utilities in at least 23 states have implemented or are about to implement on-bill financing programs, many of which (Illinois, Hawaii, Oregon, California, Kentucky, Georgia, South Carolina, Michigan, and New York) have legislation in place that supports adoption. Additionally, a number of state utility regulators have taken action to explore the feasibility of on-bill programs. [5] The Commission should strongly consider program designs that would encourage EDCs to begin pilot programs. These programs have proven to be particularly useful in reaching customers who do not qualify for conventional financing. The initial capital for on-bill programs does not have to be utility funding, but can come from a private investor or a public source.

[5] ACEEE, On-Bill Financing for Energy Efficiency Improvements, DRAFT, April 2012



6. Inclusion of a Low-Income Sector Carve-Out

The low-income sector carve-out should continue as part of Phase Two and the Commission should use energy savings in lieu of measures, which has never been clearly defined. KEEA believes that the income guidelines should be raised to 250% percent of the federal poverty level in light of the increased financial hardship and increasing rate of service termination among those customers between 151% and 250% of poverty. This recommendation does not imply support for raising the income guideline for any other low income program, such as the Customer Assistance Program. KEEA would also support strengthening the requirement that CAP customers participate in utility low income conservation programs in order to reduce the cost of CAP programs.

The current application of the Total Resource Cost (TRC) cost-effectiveness test undercounts savings from low income programs by failing to count fossil fuel savings and undervaluing reductions in arrearages, uncollectibles, terminations and other collections costs. The TRC should be expanded to more accurately assess the savings of low income programs.

The carve-out should be tied to actual savings and not to the EE&C budget -- this will ensure that the EDCs get the results envisioned by Act 129. Setting the amount of money EDCs

are permitted to spend on low-income programs does not guarantee a successful correlation of spending to actual savings.

7. Transition Issues

KEEA strongly encourages the Commission to permit EDCs that reach their Act 129 Phase One goal of 3% savings by May 31, 2013 to continue accruing energy savings and be allowed to credit any savings in excess of the Phase One goal toward their Phase Two obligations. Energy savings achieved in early years have a greater impact and benefit than savings achieved in later years. Allowing utilities to receive credit for all cost-effective energy savings will have a net benefit to Pennsylvania ratepayers in the near term and in the long term, will increase continuity and public confidence in EE&C, and will alleviate the waiting list situation in which some Pennsylvanians find themselves.

KEEA strongly believes that EDCs should be required to exhaust their Phase One funds before beginning to spend any money from their Phase Two budgets. EDCs will need more flexibility to design programs that are capable of meeting their goals in Phase Two. Again, it is KEEA's view that the statutory 2% spending cap leads to a perverse incentive for EDCs to discontinue successful, cost-effective programs for lack of program funding. By requiring EDCs to exhaust their Phase One budgets before tapping their Phase Two budgets, the Commission can provide the utilities with a much-needed buffer that will help EDCs take advantage of all the EE&C funding permitted under Act 129.

The Commission should maintain the same 2009-2010 baseline when it implements Phase Two of Act 129. Conducting another load forecast would be a waste of PUC resources because it so recently completed its previous study. The new targets should include completed targets, so that the savings can be represented cumulatively as the 3% savings expected by 2013 plus any additional savings as part of Phase Two. This would also help streamline the process of adopting Phase Two of Act 129.

8. Other Act 129 Program Design Issues

Cost-effectiveness methodology

KEEA urges the Commission to review a number of policy issues regarding cost-effectiveness tests used for Act 129 EE&C programs. Though the vast majority of states use the

Total Resource Cost (TRC) test, as does Pennsylvania, a growing body of scholarship and practice around the country recognizes various shortcomings in the use of that test.[6] Increasingly, the TRC is coming under scrutiny when it is applied unevenly; that is, when the test includes a full array of costs but not an equal treatment of benefits. While many of the benefits may be non-energy related and difficult to quantify, such as lower bills, job creation, reduced maintenance costs, and improved indoor air quality, ignoring the benefits can skew the results and lead to bias against successful programs.

To address some of these shortcomings with the TRC test, KEEA strongly recommends that, first and foremost, the Commission apply the cost-effectiveness test at the portfolio level. The Commission is currently applying the TRC at the program level, and as a result a number of valuable programs that can produce deeper savings, such a whole building approaches, may not pass. Equally importantly, the TRC should count energy savings from fossil fuels and water, ensuring that the test be 'fuel neutral.' Such savings are real and significant and should be counted in the TRC.

KEEA also recommends that the Commission consider a number of TRC test best practices put forth by the National Home Performance Council in its recent White Paper on Cost-Effectiveness.

Behavioral Approaches

Behavioral approaches to energy conservation are every bit as important as equipment and physical measures, are often the most cost effective approaches, and yet they are frequently undercounted or even discounted. KEEA recommends that the Commission undertake a review of the treatment of behavioral approaches in order to insure that all savings attributable to them are being counted accurately. This is essential to giving EDCs the full range of tools they need to maintain high levels of cost effectiveness in Phase Two.

[6] Kushler and Neme, *Is It Time to Ditch the TRC? Examining Concerns with Current Practice in Benefit-Cost Analysis,* 2010; Robin Le Baron, *Getting to Fair Cost-Effectiveness Testing: Using the PAC Test, Best Practices for the TRC Test, and Beyond*, National Home Performance Council, Draft, 2011

Benchmarking

KEEA recommends that the Commission require all utilities to facilitate energy benchmarking of buildings by automating the electronic transfer of customer usage data into proven benchmarking software such as U.S. EPA's Portfolio Manager. Not only will this support the growing number of municipalities interested in benchmarking their own buildings, for schools and other sectors, but it will also facilitate utilities' programs. Benchmarking is another tool deployed increasingly across the country, now in place in 11 states and 9 cities. By requiring annual benchmarking of publicly and privately owned buildings, this policy furthers market transformation, helping to give building owners and potential buyers more data and better understanding of buildings' energy consumption. This, in turn, helps to gradually shift the market to increasingly value efficient, high-performing building stock.

Similarly, KEEA recommends that the Commission require utilities to participate in national efforts such as the "Green Button" initiative and the Home Energy Score, both designed to give consumers better information and tools to control their own energy use and costs.

Utility Performance Incentives

In recognition of the widespread benefits of energy efficiency, the Commission should develop incentives to encourage the utilities to exceed their savings goals. It's important to align investor-owned utility goals -- primarily a return on investment for shareholders -- with the state's goal of saving energy and deferring costly power generation investments. Currently, 25 states in the U.S. have shareholder incentives for electricity efficiency programs.[7] Instituting a utility incentive plan to complement penalties for noncompliance, as many states do, would be sound public policy. There are several ways this goal can be accomplished. One recommendation would be to require utilities, either directly or through Conservation Service Providers, Curtailment Service Providers or other qualified PJM members, to participate in the PJM Forward Capacity Market by bidding in all of their Act 129 energy efficiency and demand response savings. Currently this is not happening uniformly, and benefits are left "on the

[7] Sciortino et al. 2011. *The 2011 State Energy Efficiency Scorecard.* American Council for an Energy-Efficient Economy.

table." The resulting revenue could be used to reinvest in additional Act 129 energy efficiency program activity. Another option would be to reward utilities for exceeding their milestone energy savings goals by more than 10%. We would request that revenues generated by these innovative approaches to incentives not be subject to the 2% spending cap but rather be re-invested in energy efficiency programs or used for incentive payments. The Commission should also consider permitting EDCs to collect interest on their EE&C expenditures if they have exceeded their targets by 110% as a means of rewarding utilities for investment in energy efficiency.

It is critically important that EDCs have a positive incentive beyond the threat of penalties in order for them to make greater investments in energy efficiency. KEEA urges the Commission however, to be cautious when designing incentive structures to ensure that EDCs are only earning a profit on successful energy efficiency programs, not simply reaching spending levels. In other words, the PUC should make every effort to tie incentives and penalties to outputs rather than inputs, as a means of ensuring real value. If EDCs are able to earn a return on their investments regardless of how their programs perform, it could encourage them to create costly programs regardless of energy savings results.

III. Conclusion

Again, KEEA is grateful for the opportunity to participate in the robust stakeholder process as the PUC reviews the progress of Act 129. We look forward to working together to make Phase II of the Commonwealth's energy efficiency policy as successful as possible.

Respectfully submitted on behalf of KEEA,

President
Board of Directors