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File #: 163427

November 30, 2015

VIA HAND DELIVERY

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

Re: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan - Docket No. M-2015-

Dear Secretary Chiavetta:

Enclosed for filing, please find PPL Electric Utilities Corporation's Petition requesting approval of the attached Act 129 Phase III Energy Efficiency and Conservation Plan ("Phase III EE&C Plan") for the above-referenced proceeding. A CD containing a copy of the Phase III EE&C Plan filing also is enclosed. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Devin Ryan', is written over a horizontal line.

Devin Ryan

DTR/jl
Enclosures

cc: Megan Good
Kriss E. Brown
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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 & FIRST CLASS MAIL

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Date: November 30, 2015



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of its Act 129 : Docket No. M-2015-_____
Phase III Energy Efficiency and :
Conservation Plan :

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

Pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa. C.S. §§ 2806.1 and 2806.2, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Petition seeking approval of its Phase III Energy Efficiency and Conservation Plan (“Phase III EE&C Plan”). This filing is being made pursuant to Act 129, the Implementation Order entered by the Pennsylvania Public Utility Commission (“Commission”) on June 19, 2015,¹ and the Clarification Order entered by the Commission on August 20, 2015.² The Phase III EE&C Plan includes a broad portfolio of energy efficiency and demand response programs, conservation practices and energy education initiatives. These integrated programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129 and the Commission’s *Implementation Order*.

For the reasons set forth below, PPL Electric respectfully requests that the Commission approve the Phase III EE&C Plan as described herein and the appended attachments.

¹ *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Implementation Order Entered June 19, 2015) (“*Implementation Order*”).

² *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Clarification Order Entered Aug. 20, 2015) (“*Clarification Order*”).

I. INTRODUCTION

1. PPL Electric is a “public utility” and an “electric distribution company” (“EDC”) as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric’s attorneys are:

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PPL Electric’s attorneys are authorized to receive all notices and communications regarding this Petition.

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

4. On July 1, 2009, in compliance with Section 2806.1(b)(1)(i) of Act 129, PPL Electric filed its Phase I EE&C Plan for the period of June 1, 2009, through May 31, 2013. On October 26, 2009, the Commission entered an Order approving PPL Electric’s Phase I EE&C Plan with certain modifications and requiring PPL Electric to file a revised Phase I EE&C Plan consistent with its Order.³ On February 17, 2010, the Commission approved PPL Electric’s revised Phase I EE&C Plan.⁴ The Commission thereafter approved modifications to PPL Electric’s Phase I EE&C Plan.⁵

5. On November 15, 2012, PPL Electric filed its Phase II EE&C Plan for the period of June 1, 2013, through May 31, 2016. On March 14, 2013, the Commission entered an Order approving PPL Electric’s Phase II EE&C Plan with certain modifications and directing the Company to file a revised Phase II EE&C Plan consistent with that Order.⁶ On July 11, 2013,

³ *See Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order Entered Oct. 26, 2009).

⁴ *Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order Entered Feb. 17, 2010).

⁵ *See, e.g., Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order Entered May 6, 2011).

⁶ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order Entered Mar. 14, 2013).

the Commission entered an Order approving PPL Electric's revised Phase II EE&C Plan.⁷ Further modifications to the Phase II EE&C Plan have since been approved.⁸

6. By November 30, 2013, and every five years thereafter, the Commission must assess the cost-effectiveness of the EDCs' EE&C Plans and set additional reductions in energy consumption and peak demand if the benefits of the EDCs' EE&C Plans exceed their costs. 66 Pa. C.S. §§ 2806.1(c)(3), (d)(2).⁹

7. On June 19, 2015, the Commission issued the *Implementation Order*, which determined the required energy consumption and peak demand reduction targets for each EDC subject to Act 129 and established guidelines for implementing Phase III (i.e., June 1, 2016 – May 31, 2021) of the EE&C program. To establish the EDCs' required energy consumption and peak demand reduction targets, the Commission relied on the findings of the Statewide Evaluator's ("SWE") Energy Efficiency and Demand Response Market Potential Studies. *See Implementation Order*, pp. 12, 34-35, 56-57. The Commission specified the following overall targets for PPL Electric to reduce energy consumption and peak demand:

⁷ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order Entered July 11, 2013).

⁸ *See Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order Entered Mar. 6, 2014); *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order Entered May 19, 2015).

⁹ Although subsection (d)(2) does not contain the "every five years thereafter" language that appears in subsection (c)(3), the Commission found that it must evaluate the cost-effectiveness of peak demand reduction every five years and may mandate additional peak demand reduction targets beyond November 30, 2013, if they are found to be cost-effective. *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411, M-2008-2069887, at p. 17 (Order Entered Feb. 20, 2014).

- Energy reduction compliance target = 1,443,035 MWh/yr. This is a 3.8% reduction in consumption relative to the 2010 load forecast.
- Peak demand reduction compliance target = 92 MW. This is 1.4% reduction relative to the 2007-2008 peak demand.

Implementation Order, pp. 35, 57 (footnotes omitted).

8. On August 20, 2015, the Commission issued its *Clarification Order*, which clarified certain aspects of the *Implementation Order*.

9. On September 22, 2015, the Commission issued a Secretarial Letter at Docket No. M-2014-2424864 establishing the template for the EDCs' Phase III EE&C Plans.

10. PPL Electric prepared its Phase III EE&C Plan in accordance with the Commission's *Implementation Order*, *Clarification Order*, and Phase III EE&C Plan Template.

11. For the reasons that follow, PPL Electric respectfully requests that the Commission approve its proposed Phase III EE&C Plan.

II. LEGAL REQUIREMENTS

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

- Specifies a budget showing total planned expenditures by program and customer class;
- Describes PPL Electric's method for monitoring and verifying plan results;
- Includes measures designed to achieve or exceed the required reductions and states the manner in which the consumption reductions will be achieved or exceeded;
- Complies with the designated expenditure cap of 2% of 2006 Annual Revenues for each year of the five-year plan, which equates to an average of approximately \$61.5 million per year for five years and approximately \$307.5 million¹⁰ for the Phase III. The five-year Plan will start on June 1, 2016 and conclude on May 31, 2021;

¹⁰ This funding cap excludes \$5 million estimated cost for SWE.

- Achieves a total overall gross verified energy reduction of at least 1,443,035 MWh/yr by May 31, 2021;
- Achieves a minimum of 3.5% (i.e., 50,507 MWh/yr) of the consumption reduction requirements from units of federal, state and local governments, including municipalities, school districts, institutions of higher education and non-profit entities (“GNE”);
- Achieves a minimum of 5.5% (i.e., 79,367 MWh/yr) of the consumption reduction requirements from programs solely directed at low-income customers (i.e., customers at or below 150% of Federal Poverty Income Guidelines)¹¹;
- Achieves a total overall gross verified demand reduction of at least 92 MW by May 31, 2021;
- Demonstrates that the proportion of measures available to the low-income sector is at least 9.95% of the total measures available to all customer sectors;
- Offers at least one program for each rate class and offers a reasonable mix of programs for all customers;
- Offers at least one comprehensive measure for residential customers and at least one comprehensive measure for nonresidential customers;
- Includes contracts with one or more conservation service providers (“CSPs”) necessary to implement the Phase III EE&C Plan;
- Includes a proposed reconcilable cost-recovery mechanism, in accordance with 66 Pa. C.S. § 1307;
- Demonstrates that the Phase III EE&C Plan is cost-effective based on the Commission’s Total Resource Cost (“TRC”) Test; and
- Includes an analysis of the Company’s administrative costs.

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

A. OVERVIEW OF THE PHASE III EE&C PLAN

13. PPL Electric’s Phase III EE&C Plan is attached hereto and marked as “Exhibit 1.”

PPL Electric’s Phase III EE&C Plan, as more fully described below, includes a broad portfolio

¹¹For compliance purposes, PPL Electric will count savings achieved from master-metered multifamily housing units that have low-income tenants toward the 5.5% low-income carve-out target, consistent with the Commission’s finding in the *2016 TRC Test Order*. See *2016 Total Resource Cost (TRC) Test*, Docket No. M-2015-2468992, at p. 30 (Order Entered June 22, 2015) (“*2016 TRC Test Order*”). Specifically, PPL Electric will “count savings from multifamily housing programs (including master-metered commercial customers)” toward the 5.5% low-income carve-out target “if [the Company] can verify the occupants are low-income customers but only to the extent of the low-income occupancy rate.” *Id.* Further details on how PPL Electric will count savings and costs for master-metered multifamily units that have low-income tenants are provided in Section 3 of the Phase III EE&C Plan.

of energy efficiency, energy education, and demand response initiatives. PPL Electric's portfolio of programs is designed to meet the Company's Phase III energy consumption and peak demand reduction targets and to comply with the other requirements set forth in the Commission's *Implementation Order*, as further clarified by the *Clarification Order*. The Phase III EE&C Plan includes a range of energy efficiency programs geared toward all customer classes in PPL Electric's service territory, as well as a demand response program aimed at PPL Electric's nonresidential customers, including government, non-profit, and educational ("GNE") customers. These programs are the key components of an electric energy efficiency initiative designed to achieve the required: (1) 1,443,035 MWh/yr. of reduced energy consumption over the five-year Plan; and (2) 92 MW of peak demand reduction in each of the final four program years of the five-year Plan, based on the average MW reduction in each hour of mandated four-hour events for that program year.

14. The proposed Phase III EE&C Plan follows the template provided in the September 22, 2015 Secretarial Letter at Docket No. M-2014-2424864. The Phase III EE&C Plan is divided into the following ten sections: (1) Overview of Plan; (2) Energy Efficiency and Conservation Portfolio/Program Summary Tables and Charts; (3) Program Descriptions; (4) Program Management and Implementation Strategies; (5) Reporting and Tracking Systems; (6) Quality Assurance and Evaluation, Measurement, and Verification; (7) Cost Recovery Mechanism; (8) Cost-Effectiveness; (9) Plan Compliance Information and Other Key Issues; and (10) Appendices.

15. Included as Appendix E to the Phase III EE&C Plan is the proposed *pro forma* tariff for the Phase III Act 129 Compliance Rider ("ACR III"), which is designed to fully recover all applicable EE&C-related costs. The ACR III is fully reconcilable and will be applied on a

non-bypassable basis to charges for electricity supplied to customers who receive electric distribution service from the Company.

B. PLAN DEVELOPMENT PROCESS

16. The requirements of Act 129 and the Commission's *Implementation Order* and *Clarification Order* formed the basis for development of the Phase III EE&C Plan. The Company carefully evaluated Act 129, the *Implementation Order*, the *Clarification Order*, and the Phase II EE&C Plan to determine the broad requirements and allowable annual expenditures for PPL Electric. Actual amounts paid to PPL Electric for generation, transmission, distribution and surcharges by retail customers, including revenues collected by PPL Electric for an electric generation supplier for the twelve months ended December 31, 2006, were used to determine the 2% expenditure cap established by Act 129. The maximum allowable budget identified in the *Implementation Order* for PPL Electric is \$307,506,880.¹² *Implementation Order*, p. 11 n.23 (specifying an annual budget of \$61,501,376 for Phase III).

17. The process for developing the Phase III EE&C Plan consisted of establishing a set of guiding principles, including: (1) customer focus; (2) compliance with Act 129; (3) flexibility to address changing market conditions; (4) effective program design; (5) equitable programs; (6) market acceptance; and (7) commitment to low-income customers. *See* Phase III EE&C Plan, Section 1.2.1.

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

¹² Funding cap excludes \$5 million estimated cost for SWE. *See Implementation Order*, p. 95.

19. PPL Electric's development of the Phase III EE&C Plan began by thoroughly evaluating actual performance in Phases I and II and reviewing the SWE's and PPL Electric's Phase III Market Potential Studies. In addition, PPL Electric's program staff identified possible programs and measures for consideration in Phase III based on input from stakeholders, trade allies, other utilities, and requests for proposals from potential program implementation contractors for residential, low-income, nonresidential, and demand response programs. Based on this input and review, PPL Electric developed a portfolio of programs that provides program options for all customer classes and that is designed to cost-effectively achieve the energy consumption and peak demand reduction targets set by the Commission, within the cost budget.

20. During the preparation of the Phase III EE&C Plan, PPL Electric pursued opportunities to solicit input from and inform stakeholders of the Company's progress.¹³ The Company maintained communications with a range of interested parties, including other investor-owned utilities, consumer advocates, environmental advocates, non-utility parties, governmental and non-governmental organizations, potential trade allies, and CSPs.

21. PPL Electric anticipates that this collaborative process will increase the likelihood of success in implementing the portfolio. Key information about stakeholder participation, including meeting dates and topics discussed with the participants, is summarized in Section

¹³ PPL Electric's stakeholder group includes, but is not limited to, representatives from: registered and other potential CSPs; environmental advocacy groups; Chambers of Commerce; public and private economic development organizations; community-based organizations; trade allies, including contractors, trade associations, energy services companies, and vendors; market partners that deliver or promote energy-efficiency programs, including Keystone HELP, Pennsylvania Housing Finance Agency, SEDA-Council of Governments, Community Committee of the Lehigh Valley, Schuylkill Community Action, Community Action Program of Lancaster, other Community Action Groups, and property/facilities management companies; Pennsylvania Public Utility Law Project; the Sustainable Energy Fund; statutory advocates; the Pennsylvania Department of Environmental Protection; municipal and local government groups; county commissioners; township commissioners; the EFMR Monitoring Group; the Pennsylvania Department of Community & Economic Development's Energy-efficiency engineers and consultants; Citizens for Pennsylvania's Future; and the PP&L Industrial Customer Alliance.

4.1.6 of the Phase III EE&C Plan. Although it was not possible to include every recommendation received through the stakeholder process, the Company considered the input it received from its stakeholders. PPL Electric intends to meet with stakeholders as needed (but not less than twice annually) until May 31, 2021, and use their input to help identify modifications that would improve the efficiency or cost-effectiveness of the Phase III EE&C Plan (subject to regulatory approval where required). This process should assist the review of the Phase III EE&C Plan by the stakeholders and the Commission and should hopefully serve to expedite the Plan's approval, thereby allowing more time to prepare for implementation and expanding the opportunities for consumer savings.

C. DESCRIPTION OF THE PHASE III EE&C PLAN

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

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

24. The proposed Phase III EE&C Plan, as noted above, includes a portfolio of energy efficiency, energy education, and demand response initiatives. Specifically, the proposed portfolio consists of the following 10 programs¹⁴:

¹⁴ As shown in Figure 3 of the Phase III EE&C Plan, there are 10 unique programs. The Efficient Equipment, Custom, and Demand Response programs have separate cost and savings estimates for each Nonresidential sector (i.e., Small Commercial and Industrial ("C&I"), Large C&I, and GNE).

Continued from Phase II to Phase III:

- Appliance Recycling Program;
- Efficient Lighting Program (previously Residential Retail Program in Phase II);
- Energy Efficient Home Program (previously Residential Energy-Efficiency Behavior & Education Program in Phase II) (with changes);
- Student Energy Efficient Education Program (previously Student and Parent Energy Efficiency Education Program in Phase II) (with changes);
- Home Energy Education Program (previously Behavior Program in Phase II) (with changes);
- Low-Income Winter Relief Assistance Program (“WRAP”) (with changes);
- Energy Efficiency Kits and Education Program (previously E-Power Wise Program in Phase II);
- Efficient Equipment Program (previously Prescriptive Equipment Program in Phase II); and
- Custom Program.

New Programs in Phase III:

- Demand Response Program.

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

25. Full descriptions of the programs are set forth in Sections 3.2 to 3.5 of the Phase III EE&C Plan. These programs include a range of energy-efficiency programs targeted to every customer sector in PPL Electric’s service territory, as well as a demand response program for nonresidential customers, including GNE customers.

26. PPL Electric has differentiated its programs according to five customer sectors: (1) Residential; (2) Low-Income; (3) Small C&I; (4) Large C&I; and (5) GNE. *See* Phase III EE&C Plan, Section 3. PPL Electric defines Residential customers as those customers served

under Rate Schedules RS and RTS (R). PPL Electric defines Large C&I customers as those customers served at primary and transmission voltage levels (Rate Schedules LP-4, LP-5, LPEP, and L5S). Small C&I customers include all nonresidential accounts served at secondary voltage levels (Rate Schedules GS-1, GS-3, BL, SA, SM (R), SHS, SLE, SE, TS (R), and GH-2 (R)). The Low-Income sector includes all residential customers whose household income is at or below 150% of the Federal Poverty Income Guidelines (“FPIG”). 66 Pa. C.S. § 2806.1(b)(1)(i)(G). The GNE sector is defined as “units of Federal, State and local government, including municipalities, school districts, institutions of higher education and nonprofit entities.” 66 Pa. C.S. § 2806.1(b)(1)(i)(B).

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

28. In addition, the Commission directed that each EDC obtain a minimum of 5.5% of its total required consumption reduction from low-income customers. *Implementation Order*, pp. 69-70. These savings may only be obtained from “specific low-income programs or low-income verified participants in multifamily housing programs.” *Implementation Order*, p. 69.

29. As required in the Commission’s *Implementation Order*, PPL Electric has designed its EE&C Plan to achieve at least 5.5% of its required energy consumption from the Low-Income sector (i.e., 79,367 MWh/yr) and to provide the required proportion of measures for the Low-Income sector. See Phase III EE&C Plan, Sections 1.1.1, 9.1.3; see *Implementation*

Order, pp. 63, 69-70. These programs will be available to customers that are at or below 150% of the FPIG. Phase III EE&C Plan, Sections 1.2.2, 3.2.1.

30. The Commission's *Implementation Order* also requires 3.5% of each EDC's Phase III energy consumption reduction target to come from GNE customers. *Implementation Order*, p. 76. For PPL Electric, this carve-out is 50,507 MWh/yr from GNE customers. *See* Phase III EE&C Plan, Section 1.1.1. PPL Electric is offering a mix of programs that provide GNE customers with three program opportunities, specifically the Company's Efficient Equipment, Custom, and Demand Response Programs. *See* Phase III EE&C Plan, Section 3.5.

31. Furthermore, the Commission's *Implementation Order* requires that PPL Electric's EE&C Plan include at least one comprehensive program for residential customers and one comprehensive program for nonresidential customers. *Implementation Order*, p. 61. To satisfy the requirement for residential customers, PPL Electric will continue to offer its Low-Income WRAP, which provides energy efficiency education and a mix of direct-install efficiency measures for low-income residential customers, including: an in-home audit; weatherization; lighting; water heating; heating, ventilation, and air conditioning ("HVAC"); water conservation; and appliance measures. *See* Phase III EE&C Plan, Sections 3.1.4, 3.2.1. For nonresidential customers, the Company will offer the Custom Program. *See* Phase III EE&C Plan, Sections 3.1.4, 3.3-3.5. Under the Custom Program, PPL Electric will provide financial incentives to customers who install any cost-effective project that includes measures that are not in PPL Electric's other programs, such as combined heat and power ("CHP") and other measures that are not in the Technical Reference Manual ("TRM"). Phase III EE&C Plan, Section 3.1.4. In addition, PPL Electric will offer the Energy Efficient Home Program, which offers a comprehensive mix of measures for non-low-income residential customers, including

weatherization, water heating, lighting (available through the lighting program), HVAC, and appliances. *See* Phase III EE&C Plan, Sections 3.1.4, 3.2. Both low-income and non-low-income residential customers also will receive energy efficiency education and will be encouraged to implement multiple measures and take a more comprehensive approach to energy efficiency. *See* Phase III EE&C Plan, Section 3.1.4. Additionally, through its Efficient Equipment Program, PPL Electric will offer a mix of measures including HVAC, lighting, and water heating that, if installed collectively, provide a more comprehensive solution for nonresidential customers. *See* Phase III EE&C Plan, Sections 3.1.4, 3.2.

32. Moreover, although there is not a specific target for multifamily housing, the Commission encouraged EDCs to include multifamily housing programs in their Phase III EE&C Plans. *Implementation Order*, pp. 76-77, 80. PPL Electric has designed many of its programs to address energy efficiency within multifamily housing units for owners and renters, including those units that are master-metered and individually metered and that have low-income and non-low-income residents. *See* Phase III EE&C Plan, Section 3.

33. The EE&C Plan further includes procedures to measure, evaluate, and verify performance of the programs and the Plan as a whole. *See* Phase III EE&C Plan, Section 6.1. PPL Electric also will conduct an annual cost-effectiveness evaluation of the EE&C Plan and report the results of that evaluation in its final annual report in accordance with the Commission's *2016 TRC Test Order*. *See 2016 TRC Test Order*, pp. 18-19; Phase III EE&C Plan, Section 5.1.

34. For each program in the EE&C Plan, cost-effectiveness was estimated in accordance with the Commission's *2016 TRC Test Order*.

35. PPL Electric's proposed EE&C Plan is cost-effective (separately for the energy efficiency portfolio and for the demand response portfolio), based on a TRC criterion. *See* Phase III EE&C Plan, Section 8. Cost-effectiveness of the EE&C Plan is demonstrated in the data tables presented in Section 8.2 of the Phase III EE&C Plan. PPL Electric determined the life-cycle costs, savings, and avoided cost benefits for each measure to compute the measure's cost-effectiveness from a TRC perspective. Application of the TRC identified some programs (or specific customer sectors within a program) that did not meet the cost-effectiveness threshold. However, to meet the Low-Income compliance target and to ensure a well-balanced mix of measures that encourages non-low-income customers to take a more comprehensive approach for energy efficiency, some programs with a benefit-cost ratio below 1.0 were retained in the Phase III EE&C Plan.

36. PPL Electric's programs are designed to support Residential, Low-Income, Small C&I, Large C&I, and GNE sector customers through a logical continuum of energy efficiency and demand response actions, starting with facility review and analysis and ending with implementation, verification, and evaluation. Marketing and education functions, customer care and quality assurance, program tracking, and evaluation, monitoring, and verification will be common features of all programs. The EE&C Plan is supported by financial incentives and a delivery approach focused on providing customers with the support they need to achieve their energy efficiency objectives. Implementation activities range from simple, common energy efficiency measures that can be installed with minimal oversight or administrative burdens to more complex measures that are vetted through a technical analysis and may (but are not required to) be part of a facility-wide energy management strategy.

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

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

38. Further, PPL Electric has developed its EE&C Plan to exceed its Phase III energy consumption targets and peak demand reduction target by approximately 9% and 25%, respectively, to provide a reasonable margin for risks and uncertainties.¹⁵ Phase III EE&C Plan, Sections 1.1.1, 9.1.2.

39. In addition, the Phase III EE&C Plan was designed to provide the Company with flexibility to address risks and uncertainties. *See* Phase III EE&C Plan, Section 1.2.1. For instance, the Phase III EE&C Plan contains several program options and controls that will help the Company manage the pace of programs (i.e., the savings and costs in the EE&C Plan) while reducing the frequency of formal EE&C Plan changes. Phase III EE&C Plan, Section 1.2.1. These include modifying marketing tactics, adjusting incentive levels within the ranges detailed in the Phase III EE&C Plan, suspending measures at certain times, and offering multiple delivery channels. *See* Phase III EE&C Plan, Sections 1.2.1, 3.

40. Moreover, the ability to meet the projected targets ultimately is a function of consumers' ability and willingness to participate in specific programs. To address the state of the economy and customers' ability to make investments in energy efficiency, PPL Electric has

¹⁵ PPL Electric designed its Phase III programs to achieve the required reductions in energy consumption without the need for utilizing carryover savings from Phase II. However, PPL Electric reserves the right to utilize any such carryover to meet its Phase III reduction targets if necessary.

included various incentive levels for customers and will educate customers about additional funding sources that may be available to help offset the customer's investment. Furthermore, where possible,¹⁶ PPL Electric has designed its programs to rely on existing market delivery mechanisms to identify and implement energy-efficiency products and services.

41. PPL Electric also has designed its Phase III EE&C Plan to use the savings assumptions from the Commission's 2016 TRM, which the Commission has adopted for the entirety of Phase III.¹⁷ *Implementation Order*, p. 97.

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

E. COSTS AND COST ALLOCATION

43. Section 2806.1(g) of Act 129 requires that the total cost of any EE&C Plan not exceed 2% of the EDC's total annual revenues as of December 31, 2006. 66 Pa. C.S. § 2806.1(g). PPL Electric's total annual revenues for calendar year 2006 were \$3,075,068,824. Accordingly, the designated expenditure cap of 2% of 2006 Annual Revenues for each year of the five-year plan, equates to an average of approximately \$61.5 million per year for five years and approximately \$307.5 million for the Phase III EE&C Plan. Phase III EE&C Plan, Section 7.1. Counting the estimated \$5 million in costs for the SWE, PPL Electric's total budget for Phase III is \$312.5 million. Phase III EE&C Plan, Section 7.2 n.33.

¹⁶ For example, there is not an existing market delivery mechanism for programs such as Low-Income WRAP, the Appliance Recycling Program, and the Home Energy Education Program.

¹⁷ The Company observes that the Commission also "reserve[d] the right to perform mid-phase updating if [the Commission] deem[s] it necessary, such as in instances where major market or technology transformations affect the EE&C Programs and associated savings values." *Implementation Order*, p. 98.

44. PPL Electric will spend most of the \$312.5 million to implement its Phase III EE&C Plan. Phase III EE&C Plan, Section 7.2. This total cost also will include the costs that PPL Electric incurred to develop its EE&C Plan. Phase III EE&C Plan, Section 7.2. In the *Implementation Order*, the Commission again found that EDCs should be permitted to recover the incremental cost incurred to design, create, and obtain Commission approval of a plan. *Implementation Order*, pp. 132, 135.

45. In addition, Section 2806.1(a)(11) of Act 129 mandates that EE&C measures be paid for by the same customer class that receives the energy and conservation benefits of those measures. 66 Pa. C.S. § 2806.1(a)(11). The Phase III EE&C Plan estimates the costs and savings for each of the five customer sectors (i.e., Residential, Low-Income, Small C&I, Large C&I, and GNE). Phase III EE&C Plan, Sections 2.3, 7.5. However, for cost-recovery purposes, the Company must assign and allocate costs to each customer class. To that end, PPL Electric will: (1) directly assign costs to customer classes; and (2) allocate costs that are applicable to more than one customer class or that provide system-wide benefits using an allocation factor. Phase III EE&C Plan, Section 7.5. The allocation factor is a percentage equal to the actual EE&C costs directly assigned to each customer class divided by the actual EE&C costs assigned to all customer classes. Phase III EE&C Plan, Section 7.5.

46. The Company also notes that its GNE programs are available to customers in any rate class who meet GNE eligibility requirements. Phase III EE&C Plan, Section 7.5. However, the Phase III EE&C Plan does not have separate savings and costs budgets for each rate class within GNE. Phase III EE&C Plan, Section 7.5. For instance, there is no specific budget for Large C&I customers participating in GNE programs. For cost recovery, the Company's ACR III rate will initially assume that 60% of the estimated GNE costs will come from Small C&I

participants and 40% from Large C&I participants. This initial allocation was based on the actual results from Phases I and II. PPL Electric will assign actual GNE costs to the specific rate class of each GNE participant. The Company's annual reconciliation process, described in Section III.F, *infra*, will account for any differences between the estimated and actual GNE costs by customer class. *See* Phase III EE&C Plan, Section 7.5.

F. COST RECOVERY TARIFF MECHANISM

47. Act 129 directs each EDC to establish a reconcilable cost recovery tariff mechanism in accordance with 66 Pa. C.S. § 1307 and include this mechanism in its Phase III EE&C Plan. 66 Pa. C.S. § 2806.1(b)(1)(i)(H), (k)(1); *see Implementation Order*, p. 145. Appendix E to the Phase III EE&C Plan contains the Company's proposed ACR III, which is a reconcilable adjustment clause under Section 1307 that will be set to recover the estimated program costs PPL Electric expects to incur each program year to achieve its energy consumption and peak demand reduction targets for that program year. Phase III EE&C Plan, Section 7 and Appx. E; *see Implementation Order*, p. 149. The ACR III will be filed by May 1 of each year and will set forth the rates that will be charged to each customer depending on the customer's rate schedule. *See* Phase III EE&C Plan, Appx. E. For each program year, PPL Electric will annually reconcile the actual expenses incurred for each customer class as a whole with the actual revenues it recovers through ACR III for that customer class as a whole. Phase III EE&C Plan, Section 7 and Appx. E; *see Implementation Order*, p. 149. In addition to the annual reconciliation, upon determination by the Company that the ACR III rate (if left unchanged) would result in a material over- or under-collection of Phase III costs incurred or expected to be incurred during the current 12-month period, the Company may file with the Commission for an interim revision of the ACR III rate. Phase III EE&C Plan, Section 7.4 and Appx. E.

48. Section 2806.1(h) of Act 129 also provides that the Commission can recover program implementation costs from EDCs. *See Implementation Order*, p. 95. Consequently, it follows PPL Electric can recover those costs from customers, and the Company will recover such costs through the ACR III. However, PPL Electric observes that the costs for the SWE are not included under the Company's 2% cost cap, in accordance with the *Implementation Order*.¹⁸ *See Implementation Order*, p. 95.

49. Further, the Commission's *Implementation Order* requires EDCs to combine their Phase II and Phase III surcharges¹⁹ into a single surcharge and tariff for Phase III using the Commission's specified transition plan. *Implementation Order*, p. 149. In accordance with the *Implementation Order*, PPL Electric will reconcile the actual costs incurred through March 31, 2016, with the actual revenues received through March 31, 2016. *Implementation Order*, pp. 146, 149. Any net over- or under-recovered amount will be reflected as a separate line item of the E-factor calculation of the Phase III rates that will become effective on June 1, 2016. *Implementation Order*, pp. 146, 149. Moreover, the Company will include, as part of its calculation of the Phase III rates effective June 1, 2016, separate line items for the following projections: (1) expenses to finalize any measures installed and commercially operable on or before May 31, 2016; (2) expenses to finalize any contracts; and (3) any other Phase II administrative obligations.²⁰ *See Implementation Order*, pp. 146-47, 149. Additional details of

¹⁸ In establishing the 2% cost cap, Section 2806.1(g) specifically characterizes the cap as a limitation on the "total costs of any plan required under this section." 66 Pa. C.S. § 2806.1(g). Because the costs of the SWE are not the costs of PPL Electric's Phase III EE&C Plan, they are not subject to the limitation set forth in Section 2806.1(g).

¹⁹ PPL Electric notes that its current cost recovery tariff mechanism for Phase II is the Phase II Act 129 Compliance Rider ("ACR II"), which will remain effective through May 31, 2016. *See* Electric Pa. P.U.C. No. 201, Supp. No. 134, First Revised Page No. 19Z.10A; *Implementation Order*, pp. 147, 149.

²⁰ The Company further notes that in accordance with the *Implementation Order* it will include the following as separate line items in the reconciliation for April 1, 2016, through March 31, 2017: (1) revenues and expenses of the

how PPL Electric's ACR III for Phase III will accomplish this transition are provided in Appendix E to the Phase III EE&C Plan.

G. IMPLEMENTATION SCHEDULE AND STRATEGY

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

51. PPL Electric's implementation strategy is based on several key features that the Company has identified as critical to achieving the objectives of the proposed Phase III EE&C Plan. *See* Phase III EE&C Plan, Section 1.6. First, PPL Electric will rely on a broad range of CSPs, employees, trade allies, community agencies, stakeholders, and other entities engaged in energy efficiency to promote, deliver, and support the effective deployment of programs. Phase III EE&C Plan, Section 1.6. Second, the Company will use three sector-level CSPs (i.e., Residential, Low-Income, and Nonresidential), and one program-specific CSP (i.e., Demand Response) to deliver its portfolio. Phase III EE&C Plan, Section 1.6. Third, PPL Electric and its CSPs will engage in active marketing and outreach to customers about the programs. Phase III EE&C Plan, Section 1.6. Fourth, the Company will rely on trade allies and other market partners to engage customers, promote programs, evaluate projects, and stock and install energy-efficient equipment. Phase III EE&C Plan, Section 1.6.

remaining two months of Phase II (i.e., April 2016 and May 2016); (2) expenses to finalize any measures installed and commercially operable on or before May 31, 2016; (3) expenses to finalize any contracts; and (4) other Phase II administrative obligations. *Implementation Order*, pp. 147, 149.

IV. CUSTOMER NOTICE

52. The Company proposes to provide notice of this filing consistent with the notice provided by the Company for its Phase I and Phase II EE&C Plans. First, PPL Electric will serve copies of the filing on the Office of Consumer Advocate, the Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, and all parties of record in PPL Electric's Phase II EE&C Plan proceeding. Second, the Company will send notice of the filing to participants in the stakeholder process described in Section III.B, *supra*. Third, the filing will be posted on PPL Electric's Act 129 web site at www.pplact129.com. Fourth, the Company understands that the Commission will publish notice of this filing in the *Pennsylvania Bulletin*. PPL Electric believes that these various communications initiatives will provide all interested parties with full notice of the Company's proposals and an opportunity to participate in the Commission proceeding addressing those proposals.

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

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

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

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

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

57. Fourth, the Phase III EE&C Plan contains a proposed tariff mechanism for full cost recovery. PPL Electric's proposed ACR III is designed to recover all of the costs for energy efficiency and conservation measures incurred by the customer class that received the benefit of those measures. To the extent that PPL Electric over- or under-recovers costs from customers, those funds will be refunded or recovered through the ACR III as part of the Company's annual reconciliation process.

VI. CONCLUSION

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

Respectfully submitted,



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Date: November 30, 2015

Attorneys for PPL Electric Utilities Corporation

EXHIBIT 1

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation
Energy Efficiency and Conservation Plan
Act 129 Phase III

Docket No. M-2015-_____

November 30, 2015

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Acronyms and Abbreviations

Acronym	Definition
ACR	Act 129 Compliance Rider
AMCA	Air Movement & Control Association
BLS	Bureau of Labor Statistics
C&I	Commercial and industrial
CBO	Community based organization
CFL	Compact Fluorescent Lamp
CFM	Cubic feet per minute
CHP	Combined heat and power
CIP	Continuous improvement process
Commission	Pennsylvania Public Utility Commission
CSP	Conservation service providers
DEER	California Database for Energy -Efficiency Resources
DSM	Demand-side management
ECM	Electronically commutated motor
EDC	Electric distribution company
EE&C Plan	Act 129 Phase III Energy Efficiency and Conservation Plan
EEMIS	Energy Efficiency Management Information System
EISA	Energy Independence and Security Act of 2007
ELRP	Emergency Load Response Program
EM&V	Evaluation, measurement, and verification
FHPC	Floating Head Pressure Control
FPIG	Federal Poverty Income Guidelines
GNE	Government/Nonprofit/Educational
HER	Home energy report
hp	Horsepower
Hub	Customer Engagement Hub
IEEE	Institute of Electrical and Electronics Engineers
IRR	Internal rate of return
LED	Light Emitting Diode
LEED	Leadership in Energy and Environmental Design
LIHEAP	Low-Income Home Energy Assistance Program
LIURP	Low-Income Usage Reduction Program
LMP	Locational Marginal Price
M&V	Measurement and verification
NTG	Net-to-gross
NYMEX	New York Mercantile Exchange
Pa PUC	Pennsylvania Public Utility Commission
PC	Personal computer
Phase III Plan	Act 129 Phase III Energy Efficiency and Conservation Plan
PJM	PJM International
Plan	Act 129 Phase III Energy Efficiency and Conservation Plan
PSC	Permanent-split capacitor
QA/QC	Quality assurance/quality control
RFP	Requests for proposals
RTF	Regional Technical Forum
RTO	Regional transmission organization
SP	Shaded-pole

List of Acronyms

Acronym	Definition
SWE	Statewide Evaluator
TRC	Total Resource Cost
TRM	Technical Reference Manual
VFD	Variable frequency drive
VSD	Variable speed drive
WRAP	Winter Relief Assistance Program

1 Overview of PPL Electric’s Act 129 Phase III Plan

1.1 Summary Description of the Plan

PPL Electric Utilities Corporation (“PPL Electric,” or “the Company”) hereby submits its Act 129 Phase III Energy Efficiency and Conservation Plan (“EE&C Plan,” “Plan,” or “Phase III Plan”) in compliance with Act 129 of 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1, 2806.2 (“Act 129”) and pursuant to the Pennsylvania Public Utility Commission’s (“Pa PUC” or “the Commission”) Implementation Order entered on June 19, 2015, at Docket No. M-2014-2424864 (“Implementation Order”), the Commission’s Clarification Order entered on August 20, 2015, at Docket No. M-2014-2424864 (“Clarification Order”), and the Commission’s 2016 Total Resource Cost (“TRC”) Test Order entered on June 22, 2015, at Docket No. M-2015-2468992 (“2016 TRC Test Order”). The Plan includes a portfolio of 16 energy efficiency, demand reduction, and conservation programs¹ comprising five customer sectors, outlined in Table 1.

Table 1. PPL Electric Phase III Programs

#	Program Name	Continuing	New
Residential Sector Programs			
1	Appliance Recycling	●	
2	Efficient Lighting	●	
3	Energy Efficient Home	●*	
4	Student Energy Efficient Education	●*	
5	Home Energy Education	●*	
Low-Income Sector Programs			
6	Low-Income Winter Relief Assistance Program (“WRAP”)	●*	
7	Energy Efficiency Kits and Education	●	
Small Commercial & Industrial (“C&I”) Sector Programs			
8	Small C&I Efficient Equipment	●	
9	Small C&I Custom	●	
10	Small C&I Demand Response		●
Large C&I Sector Programs			
11	Large C&I Efficient Equipment	●	
12	Large C&I Custom	●	
13	Large C&I Demand Response		●
Government/Nonprofit/Educational (“GNE”) Sector Programs			
14	GNE Efficient Equipment	●	
15	GNE Custom	●	
16	GNE Demand Response		●

* Continued with changes.

¹ As shown in Figure 3, there are 10 unique programs. The Efficient Equipment, Custom, and Demand Response Programs have separate cost and savings estimates for each nonresidential sector (i.e., Small Commercial and Industrial [“C&I”], Large C&I, and Government/Nonprofit/Educational [“GNE”]).

The portfolio offers PPL Electric customers a cost-effective, equitable, flexible, and comprehensive set of programmatic choices, incentives, information, and educational opportunities. Together, these programs meet the goals set forth in the Implementation Order, including cost-effectively achieving all savings objectives within the required budget caps (see summary table below). Each individual program is described in Section 3. Table 10 provides a more complete summary of costs, savings, and cost-effectiveness for each program and customer sector.

Table 2. Summary of Compliance Targets

	Compliance Target	EE&C Plan
Overall energy reductions (MWh/year)	1,443,035	1,582,985
Overall peak reductions (MW)	92	115
Low-income energy reductions (MWh/year)	79,367	88,147 (96,500 with Phase II carryover)
GNE energy reductions (MWh/year)	50,507	81,000 (94,500 with Phase II carryover)
Budget cap (excluding SWE costs)	\$307,500,000	\$307,479,000
Cost Effectiveness (per TRC)	1.0	1.61 (energy efficiency) 1.90 (demand response)

1.1.1 Portfolio Objectives

PPL Electric designed the Phase III Plan to meet the requirements set forth by the Commission’s Implementation Order. Those requirements are that PPL Electric must:

- Offer programs for a five-year term, beginning in June 2016 and concluding in May 2021.
- Comply with the designated expenditure cap of 2% of 2006 annual revenues for each year of the five-year Plan, which equates to a total energy efficiency budget of approximately \$307.5 million² over the five-year Phase III period and an average program acquisition cost of approximately \$0.20/annual kWh saved.
- Achieve 3.8% reduction in overall energy consumption from the baseline (i.e., forecast kWh sales for June 1, 2009, to May 31, 2010), which is equivalent to 1,443,035 MWh/year gross verified savings. The EE&C Plan must be designed to achieve at least 15% of the cumulative annual energy reduction target in each of the five program years, which equates to 216,455 MWh/year.
- Achieve required energy reduction set-aside targets, including:
 - A minimum of 3.5% (i.e., 50,507 MWh/year gross verified savings) of the total required energy reductions from the GNE sector.
 - A minimum of 5.5% (i.e., 79,367 MWh/year gross verified savings) of the total required energy reductions from the low-income customer sector (i.e., those at ≤150% of the Federal Poverty Income Guidelines [“FPIG”]). Compliance savings must come entirely from income-qualified

² This figure excludes approximately \$5 million for PPL Electric’s portion of the statewide evaluator’s costs that are not subject to the funding cap.

programs and may not accrue from low-income customer participation in general residential programs.

- Achieve peak demand reduction of 92 MW gross verified savings at the generator level in each of the last four years of Phase III, based on the average MW reduction in each hour of mandated four-hour events for that program year. In addition, each event must achieve 85% of the 92 MW compliance target.
- Offer at least one energy efficiency program for each customer sector.
- Offer at least one comprehensive program for residential customers and one comprehensive program for nonresidential customers.
- Ensure the portfolio is cost-effective based on the TRC test, separately for the energy efficiency portfolio and the demand response portfolio.
- Allocate the cost of measures to the customer class that receives the benefit of those measures.
- Include high-level plans to measure, evaluate, and verify the performance of individual programs and the Plan as a whole.

In addition, PPL Electric has designed the EE&C Plan to:

- Exceed compliance targets by a minimum of approximately 9% to allow for evaluation and other uncertainties.
- Achieve broad stakeholder consensus to the extent practical.
- Provide significant energy efficiency education to customers and encourage customers to take a more comprehensive, holistic approach to energy efficiency (e.g., multiple measures, whole house, whole building).
- Provide programs that achieve high customer satisfaction.
- Provide a transition for customers from Phase II to Phase III programs. This includes:
 - Offering residential customers a comparable mix of measures and incentive levels provided during Phase II for the first three months of Phase III;
 - Offering comparable incentives to customers with nonresidential projects on the Phase II waitlist that are completed in early Phase III. and
 - Allowing approved nonresidential Phase II projects to be eligible for a Phase III rebate if the project is completed in Phase III and is installed during the first six months of Phase III, although PPL Electric may grant exceptions to this deadline on a case-by-case basis depending on the nature and schedule of the project.
- Provide low-income programs at no cost to participants, although Act 129 Compliance Rider ("ACR") charges will appear on their bills.
- Provide as much of the low-income savings as possible, within budget constraints, from direct-install measures.
- Provide a customer-sector centric approach that is flexible enough to control the pace of programs if customer preferences or market conditions change. .
- Achieve a reasonable net-to-gross ("NTG") ratio for each program.
- Significantly reduce program administrative costs (per annual kWh saved) compared to Phase II.

- Develop an effective trade ally network (such as HVAC and lighting contractors) that stocks and promotes efficient equipment.
- Achieve an equitable distribution of programs, savings, and costs for all customer sectors (i.e., Residential, Low-Income, Small C&I, Large C&I, and GNE).

PPL Electric is well positioned to deliver a portfolio of programs that will meet customers' needs, fulfill the Company's Plan objectives, and achieve the results required for Phase III. PPL Electric designed its programs to provide residential, low-income, Small C&I, Large C&I, and GNE customers with a comprehensive range of options intended to drive participation. PPL Electric uses targeted marketing techniques that capitalize on ongoing market research and customer/trade ally feedback to match outreach and messaging strategies with likely participants' primary participation drivers. Education, customer care, technical support, quality assurance ("QA"), quality control ("QC"), and evaluation, measurement, and verification ("EM&V") are common features of all programs.

The entire portfolio is supported by financial incentives, an active trade ally network, tracking, and a delivery approach focused on providing customers with the support they need to achieve their energy efficiency objectives and encourage their continued engagement with PPL Electric programs. Implementation activities range from simple, common energy efficiency measures that can be installed with minimal oversight or administration to more complex measures that may be (but are not required to be) part of a facility wide energy management strategy. The Plan identifies opportunities for customers in all sectors to participate in one or more programs.

1.1.2 Overall Strategy to Achieve Energy Efficiency and Conservation Goals

Achieving the Phase III energy reduction compliance targets will be more challenging than achieving the Phase II targets because the Phase III per-unit program acquisition budget³ is approximately 30% lower than PPL Electric's approved Phase II EE&C Plan. In addition, the Phase III low-income set-aside target is 25% higher than Phase II and can only be met with income-qualified residential customers, whereas in Phase II, low-income participation in general residential programs counted toward compliance, a significantly less costly solution. Therefore, to achieve the more challenging Phase III energy reduction compliance targets, PPL Electric established the following strategy:

- Reducing and controlling program administrative costs. PPL Electric designed its Phase III programs to have a 30% lower program acquisition cost than its Phase II programs. To achieve this reduction in program acquisition cost, PPL Electric reduced its administrative costs (i.e., all costs except for incentives) by consolidating all sector-level programs under a single Conservation Service Provider ("CSP"), in order to:

³ The program acquisition cost is defined as PPL Electric's total cost to implement the program (including administration and incentives) divided by annual kWh saved.

- Gain economies of scale associated with cross-program functions (e.g., call center, rebate processing, market research, marketing, analytics, website development, program management);
- Develop a single view of the customer across all programs to improve the effectiveness of marketing, customer communications, and program cross-promotion, thereby increasing participation and project comprehensiveness and reducing outreach and recruitment costs;
- Implement contracts that tie payments to CSP performance to ensure they are accountable for successful program delivery (i.e., cost and savings);
- Obtain earlier program design input from CSPs;
- Consolidate PPL Electric oversight and program management;
- Improve the effectiveness of the trade ally network; and
- Automate rebate applications, QA/QC, rebate processing, and other functions where practical.
- Taking additional steps to reduce administrative costs by:
 - Reducing the cost and improve the functionality of the programs tracking system; and
 - Reducing the cost of evaluation.
- Emphasizing more comprehensive projects and measures for residential and nonresidential customers by:
 - Providing significantly more customer education about energy efficiency, especially personalized information for a customer's specific home/business;
 - Promoting the implementation of multiple-measure, comprehensive projects (whole home/whole building);
 - Offering trade ally incentives), if necessary, to compensate trade allies for stocking more efficient measures and for spending time to inform customers about higher efficiency equipment and multi-measure installations;
 - Offering tiered incentives to encourage multi-measure, whole home/whole building projects; and
 - Aligning and promoting HVAC and other equipment rebates in conjunction with manufacturer rebates.
- Providing a transition from Phase II to Phase III programs to maximize customer satisfaction and provide incentives (and savings) for projects that straddle both phases.⁴
- Focusing on cost-effective measures with high savings, low program acquisition cost, and reasonable NTG ratios.
- Ensuring that PPL Electric program staff are effective, knowledgeable, and accountable to defined performance metrics, by requiring they:

⁴ The in-service date of the project determines whether the funding is provided by Phase III or Phase II.

- Have a full understanding of all aspects of their programs and the markets in which they operate;
- Develop program-specific performance metrics in order to track, monitor, and analyze program success;
- Benchmark program metrics with similar programs in the U.S.;
- Maintain effective relationships with trade allies by frequently communicating with trade allies and understanding their practices and business needs; and
- Possess a strong knowledge of customer behavioral triggers, motivations, and barriers.
- Enhancing the customer and trade ally experience by:
 - Simplifying incentive applications and offering multiple submission formats (e.g., paper/mail in, online, tablet entry by trade allies);
 - Improving rebate processing time; and
 - Increasing the level of customer service through focused interactions that are personalized and flexible, when practical.

Shortly after the Commission issued the Implementation Order, PPL Electric developed separate budgets, savings targets, and performance objectives for a Demand Response CSP, as well as three separate customer sector-level CSPs: Residential, Low-Income, and Nonresidential. To accomplish this, the Company relied on Phase III Market Potential Studies, its Phase II experience, Phase II evaluation results, and an analysis of the Phase III compliance target requirements, including the overall, low-income, GNE, and demand reduction compliance targets (as well as the demand reduction budget suggested by the Commission). PPL Electric reviewed these budgets and savings objectives with stakeholders.

PPL Electric issued four requests for proposals (“RFPs”) for the design and delivery of Residential, Nonresidential, Low-Income, and Demand Response programs. These RFPs were necessary to confirm that PPL Electric’s savings targets and budgets (including the 30% reduction in overall program acquisition costs) were achievable for each sector, and to determine an appropriate mix of programs and measures to include in the EE&C Plan. In addition, PPL Electric engaged The Cadmus Group, Inc. (Cadmus)⁵ to conduct a cost-effectiveness analyses of the EE&C Plan and estimate NTG ratios for each program. This process is described in greater detail in Section 1.2.2 and Section 8. PPL Electric engaged stakeholders throughout this process to obtain their input on the EE&C Plan.

As a result of this process, PPL Electric identified five Residential programs, two Low-Income programs, two Nonresidential programs for each Nonresidential customer sector (i.e., Small C&I, Large C&I, and GNE), and one Demand Response program for each Nonresidential customer sector that together will

⁵ Cadmus is a 100% employee-owned consulting firm. For more than 30 years, Cadmus has been helping organizations forecast energy demand and trends; design programs and portfolios to capture the energy savings; and assess achievement of energy and demand savings.

comprise its Phase III EE&C Portfolio. The portfolio is projected to be cost-effective (i.e., the estimated energy efficiency portfolio benefit/cost ratio is 1.61; the estimated demand response portfolio benefit/cost ratio is 1.90), producing five-year energy savings of 1,582,984 MWh/year and demand reductions of 115 MW, which exceeds PPL Electric's compliance targets by 139,949 MWh/year (~9%) and 23 MW (25%), respectively, at or below the Company's budget cap.

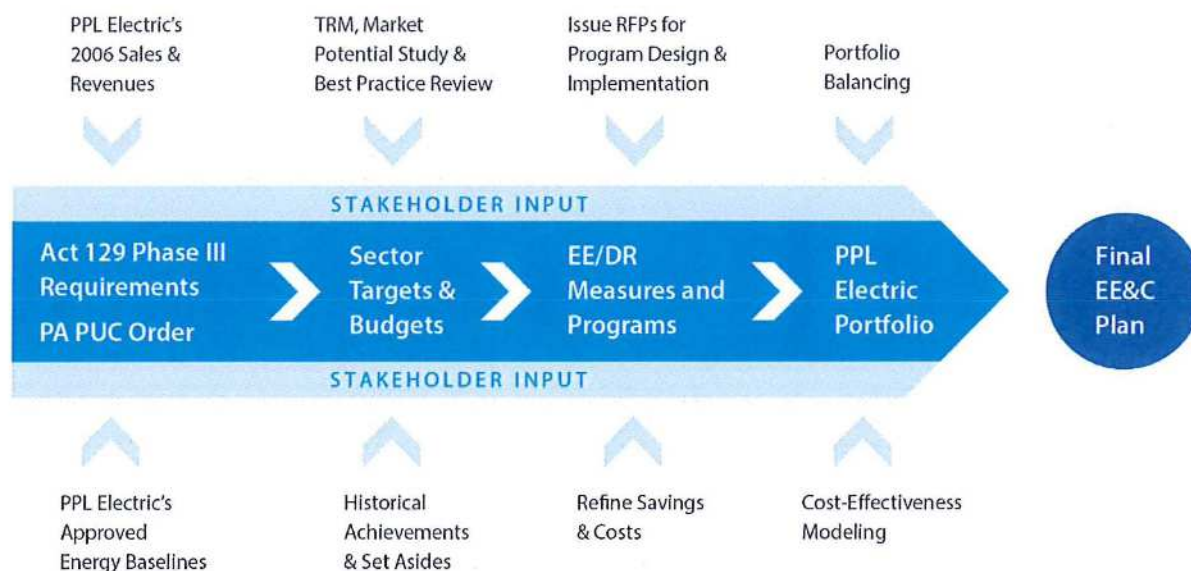
1.2 Plan Development Process and Key Assumptions

PPL Electric began developing the EE&C Plan shortly after the Pa PUC entered the Tentative Implementation Order on March 11, 2015, at Docket No. M-2014-2424864. After more than five years of offering Act 129 programs, PPL Electric has cultivated an experienced professional staff of energy efficiency and demand response program managers who have worked closely with CSPs, trade allies, customers, and stakeholders to seek their input on programs and measures.

An in-house steering committee of executives and managers with involvement in Act 129 guided the overall Plan development process. The Plan is primarily based on Act 129 requirements, the Commission's Implementation Order, the Phase III Market Potential Studies (for energy efficiency and demand response), experience from Phase I and Phase II, stakeholder input, and the RFPs for program implementers.

In order to achieve the Commission's energy savings targets within the required budget caps, PPL Electric looked to the implementation market for solutions. By issuing competitive RFPs requesting innovative strategies from potential implementation contractors, the Company was able to identify an optimal mix of measures and programs that can achieve significant energy savings at a comparatively low acquisition cost. PPL Electric conducted five formal (i.e., whole group) stakeholder meetings and many meetings/teleconferences with individual stakeholders and smaller groups from July through October 2015 to solicit input for the EE&C Plan. Figure 1 summarizes PPL Electric's process for developing the Plan. Additional detail is provided in the sections that follow.

Figure 1. Process for Developing the Plan



1.2.1 Principles Guiding Development of the Plan

PPL Electric has a long-standing commitment to energy efficiency and helping customers use electricity wisely and save on their electricity bills. The following guiding principles served as a backdrop to developing the measures, programs, and implementation strategies in PPL Electric’s portfolio:

- Customer focus:** During its Phase I and Phase II programs, PPL Electric has consistently focused on the customer and improved its programs to meet changing customer and market preferences. The Company designed its portfolio to educate and empower customers to take actions that save energy and money by providing: personalized customer service; accelerated rebate processing; and clear and easy-to-understand program information on its website and program applications. The Plan offers a diverse range of information, education, and incentives to help PPL Electric customers engage in energy efficiency and make informed, sustainable choices that will have a lasting impact on their energy costs.
- Compliance with Act 129:** Consistent with the requirements of Act 129 and the Implementation Order, PPL Electric developed a portfolio of cost-effective energy efficiency and demand response programs that account for stakeholders’ input and will generate the energy savings and demand reductions needed to meet the goals required by Act 129 and the Commission. The Plan is designed to exceed PPL Electric’s compliance targets by a minimum of approximately 9% and within the budget cap.
- Flexibility to address changing market conditions:** PPL Electric designed its Plan to achieve its EE&C targets within its designated budget cap even as market conditions and customer preferences change over time. The Plan has flexible solutions that will enable PPL Electric and its selected CSPs to address changing market conditions in a timely and cost-effective manner. The Plan achieves this objective by:

- Relying on a diverse set of proven, market-ready, and cost-effective energy efficiency (electric) technologies and conservation strategies;
 - Using CSPs that will help achieve economies of scale by consolidating multiple program-level administrative and delivery functions, by encouraging customer participation in multiple programs through effective cross-promotion and by having a single view of the customer across all measures and programs;
 - Leveraging existing market activity and brand awareness through consistent program offerings that allow customers to access rebates for any measures they committed to late in Phase II (but are placed in service in Phase III), thereby enabling a transition from Phase II to Phase III programs; and
 - Providing multiple program options and controls that help PPL Electric manage the pace of programs (i.e., the savings and costs in the EE&C Plan) and reduce the frequency of formal EE&C Plan changes. These include modifying marketing tactics, adjusting incentive levels within specified ranges, offering different measures at different times, and offering multiple delivery channels.
- **Effective program design:** To design these programs, the Company relied on proven, cost-effective technologies and delivery strategies, and based its participation, savings, and cost projections on well-researched market potential data, historical performance, and analysis of regional and national trends in similar markets.
 - **Equitable programs:** PPL Electric sought stakeholder input on priorities, opportunities, and challenges faced by the range of customer sectors, trade allies, and market partners that its programs serve. The EE&C Plan includes a range of measures and programs designed to meet the needs of all of PPL Electric's customers with savings and costs distributed equitably across all customer sectors.
 - **Market acceptance:** PPL Electric designed its Plan to stimulate market acceptance and installation of energy efficient technologies. The Company works closely with retailers, distributors, contractors, and other trade allies to encourage them to stock, specify, and promote energy efficient technologies. The EE&C Plan includes provisions for training and education, outreach to trade allies and stakeholders, and an active awareness campaign to increase customer knowledge about and acceptance of the benefits of energy efficient equipment and keep them informed about new advances in energy efficient products. PPL Electric will continue to encourage the wide availability of program-eligible energy efficiency measures and to support increasing demand for energy efficient products and equipment. The Company will monitor its programs' performance and adjust them as required if programs are not successful or if there are low NTG ratios.
 - **Commitment to low-income customers:** The EE&C Plan continues PPL Electric's commitment to helping low-income customers reduce their electricity consumption. PPL Electric will continue its successful Low-Income WRAP and E-Power Wise Program (renamed the Energy Efficiency Kits and Education Program for Phase III). In Phase III, PPL Electric expects the Low-Income WRAP to reach approximately twice the number of homes per year than in Phase II, and expects to reduce the low-income program acquisition cost by approximately 50%.

1.2.2 Developing the Portfolio

In its RFPs, the Company challenged bidders to propose a portfolio of programs that could achieve the required sector-level savings targets within the allocated budget, adhere to PPL Electric's overall guiding principles, and comply with additional program design features tailored to each customer sector, as described below.

Residential Sector

PPL Electric designed the residential portfolio to achieve verified gross energy savings of approximately 656,000 MWh/year over the five-year Plan and at least 15% of the total cumulative verified gross savings in each program year. Additionally, the Company designed the residential portfolio to meet its savings objective at a total direct program cost (excluding the allocation of common, portfolio-level costs) of approximately \$96,000,000 and total program cost (including the allocation of common costs) of approximately \$112,000,000. The program acquisition cost (including the allocation of common costs) for the Residential sector is approximately \$0.17 per annual kWh saved, which is 40% lower than in Phase II. PPL Electric further designed programs within the Residential sector to:

- Achieve acceptable NTG ratios as determined by PPL Electric, its evaluator, or the statewide evaluator ("SWE");
- Wherever possible, be cost-effective as determined by the Pennsylvania 2016 TRC test method;
- Offer diverse and comprehensive measure choices to all residential customers across PPL Electric's entire service territory; and
- Achieve high customer satisfaction (i.e., ≥80% of customers are very satisfied/satisfied).

Low-Income Sector

PPL Electric designed its low-income portfolio to achieve verified gross energy savings of approximately 88,000 MWh/year (96,000 MWh/year with Phase II carryover), which is 11% greater (21% including carryover) than the low-income compliance target.⁶ To meet its savings objective at a total direct program cost (excluding common portfolio-level costs) of approximately \$47,000,000, and a total program cost of approximately \$55,000,000 including the allocation of common costs. PPL Electric's low-income program acquisition cost (including the allocation of common costs) will be approximately \$0.62 per annual kWh saved, which is 38% lower than in Phase II.

PPL Electric will offer its low-income portfolio at no cost to households that are at or below 150% of the FPIG. The Company will provide a variety of energy efficiency measures through its low-income programs and will strive to maximize savings within budget constraints, from direct install measures. Finally, PPL Electric designed the low-income portfolio to achieve at least 15% of the total cumulative

⁶ Low-income savings from participation in PPL Electric residential (non-low-income) programs do not count toward the low-income sector verified gross energy savings in Phase III.

verified gross savings in each program year. In addition, individual programs in the low-income portfolio are designed to:

- Achieve high customer satisfaction (i.e., $\geq 80\%$ of customers are very satisfied/satisfied);
- Address: renters and owners of (1) single family homes, (2) multifamily buildings that are in a residential rate class and are occupied by low-income customers, (3) multifamily buildings that are master metered and are in a nonresidential rate class but have low-income occupants, and (4) manufactured homes; and
- Offer information to Low-Income WRAP and Energy Efficiency Kit and Education Program participants regarding PPL Electric's other low-income programs (such as payment assistance).

Individual programs, such as Low-Income WRAP, are not required to be cost-effective (per the 2016 TRC Test Order) as long as the EE&C portfolio as a whole is cost-effective.

Nonresidential Sector

PPL Electric designed the Nonresidential sector portfolio to achieve combined verified gross energy savings of approximately 838,000 MWh per year (from three customer segments: Small C&I, Large C&I, and GNE) with at least 15% of the total verified gross savings in each program year. PPL Electric designed the nonresidential portfolio to achieve its savings objectives at the approximate total program costs for each sector shown below:

- Small C&I: total direct costs (excluding the allocation of common costs) \$62,000,000, and total cost (including the allocation of common costs) \$72,000,000;
- Large C&I: total direct costs (excluding the allocation of common costs) \$44,000,000, and total cost (including the allocation of common costs) \$51,000,000; and
- GNE: total direct costs (excluding the allocation of common costs) \$20,000,000, and total cost (including the allocation of common costs) \$24,000,000.

The program acquisition cost for nonresidential programs is approximately \$0.21 per annual kWh saved, which is 21% lower than in Phase II (approximately 30% lower for Small C&I, 6% lower for Large C&I and 22% lower for GNE). Additionally, PPL Electric designed the programs within its nonresidential portfolio to:

- Achieve high customer satisfaction ($\geq 80\%$ of customers are very satisfied/satisfied);
- Offer a broad selection of energy efficiency measures across multiple end uses and three nonresidential customer segments (i.e., Small C&I, Large C&I, and GNE) across PPL Electric's service territory;
- Achieve acceptable NTG ratios as determined by PPL Electric, its evaluator, or the SWE;
- Be cost-effective as determined by the TRC test method; and
- Achieve approximately 81,000 MWh/year of savings from GNE (94,500 MWh/year with Phase II GNE carryover), which exceeds the GNE set-aside compliance target by 60% (87% with Phase II GNE carryover).

Demand Response

PPL Electric designed its demand response programs to meet the following verified gross peak reduction targets at the generator level:

- PY8 (June 2016 – May 2017): 0 MW
- PY9 (June 2017 – May 2018): 92 MW
- PY10 (June 2018 – May 2019): 92 MW
- PY11 (June 2019 – May 2020): 92 MW
- PY12 (June 2020 – May 2021): 92 MW

In accordance with the Implementation Order, PPL Electric will limit demand response events to the months of June through September, calling events for the first six days that the peak hour of PJM Interconnection LLC's ("PJM") day-ahead forecast for the PJM regional transmission organization (RTO) is greater than 96% of the PJM RTO summer peak demand forecast. Additionally, PPL Electric designed its demand response program such that:

- Each curtailment event will last four consecutive hours and be called to occur during the day's forecasted peak hours above 96% of PJM's RTO summer peak demand forecast;
- Once six demand response events have been called in a program year, the demand response program will be suspended for that program year; and
- Customers participating in PJM's Emergency Load Response Program ("ELRP") are eligible to participate in PPL Electric's demand response program; however, the cost to acquire dually enrolled customers (i.e., customers who participate in an Act 129 demand response program and PJM's ELRP) shall not exceed half the cost to acquire single-enrolled customers (i.e., customers who only participate in an Act 129 demand response program).

In the RFP, PPL Electric asked bidders to provide technical specifications (including program and measure types), incentive levels, and peak demand reductions, costs, and participation projections for each measure, program, and customer sector. Based on a detailed bid review and interviews, bidders and PPL Electric identified the type of demand response program the Company would offer for the Phase III EE&C Plan. PPL Electric program staff reviewed proposals to compare expected costs and savings to: (1) past achievements (such as results from the Phase I demand response programs); and (2) achievable potential savings, costs, and cost-effectiveness results from the SWE's 2015 Demand Response Market Potential Study.

Cost-Effectiveness Testing and Portfolio Iterations

Next, PPL Electric worked with Cadmus to model program-, sector-, and portfolio-level cost-effectiveness (separately for the energy efficiency and demand response portfolios) based on projected peak load reductions, energy savings, and costs (e.g., program delivery, incentives, incremental measure costs, and participant costs). PPL Electric provided the lifecycle costs, savings, and avoided cost benefits for each measure, enabling Cadmus to compute the measures' cost-effectiveness from a TRC

perspective.⁷ Key assumptions used to determine cost-effectiveness are listed in Table 96 through Table 101 in Section 8 of the EE&C Plan.

Finally, PPL Electric iteratively adjusted the expected number of participants and customer incentive levels for each program and measure to balance the portfolio, meet all savings targets, increase cost-effectiveness, and stay within the budget for each customer sector.

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

The following tables summarize the estimated savings, budget, and cost-effectiveness for PPL Electric's entire portfolio. The tables are numbered sequentially, with the formats based on those provided in the EE&C Plan Template issued by the Commission on September 22, 2015, at Docket No. M-2014-2424864 ("EE&C Plan Template"). Each table heading includes a reference to the corresponding table number provided in the EE&C Plan Template.

These include:

- Table 3: **Pa PUC Table 1a** - Portfolio Summary of Lifetime Costs and Benefits for PPL Electric's Energy Efficiency Measures
- Table 4: **Pa PUC Table 1b** - Portfolio Summary of Lifetime Costs and Benefits of Demand Response Measures
- Table 5: **Pa PUC Table 2** - Summary of Portfolio Energy Savings and Demand Reduction
- Table 6: **Pa PUC Table 3** - Summary of Portfolio Costs

⁷ The calculation methods and assumptions used for estimating all program costs are provided in Appendix D.

Table 3. Pa PUC Table 1a - Portfolio Summary of Lifetime Costs and Benefits of Energy Efficiency Measures ¹

Portfolio	Discount Rate	Total Discounted Lifetime Costs (\$1000)	Total Discounted Lifetime Benefits (\$1000)	Total Discounted Net ² Lifetime Benefits (\$1000)	TRC Ratio
Residential Sector (exclusive of Low-Income) ³	7.63%	\$169,819	\$266,903	\$97,085	1.57
Low Income	7.63%	\$47,422	\$35,608	(\$11,814)	0.75
Small C&I	7.63%	\$141,417	\$259,154	\$117,736	1.83
Large C&I	7.63%	\$94,155	\$137,160	\$43,005	1.46
GNE	7.63%	\$10,071	\$43,681	\$33,609	4.34
Total	7.63%	\$462,885	\$742,506	\$279,621	1.60

¹ Discounted common costs are included in the appropriate sector totals. See Table 92 for the allocation of common costs.

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

³ The June 11, 2015 Implementation Order disallowed the inclusion of low-income participation in standard, non-low-income-specific residential programs in the calculation of savings towards the 5.5% low-income carve-out. See June 11, 2015 Implementation Order at page 69.

Table 4. Pa PUC Table 1b - Portfolio Summary of Lifetime Costs and Benefits of Demand Response Measures ¹

Portfolio	Discount Rate	Total Discounted Lifetime Costs (\$1000)	Total Discounted Lifetime Benefits (\$1000)	Total Discounted Net ² Lifetime Benefits (\$1000)	TRC Ratio
Small C&I	7.63%	\$1,102	\$2,487	\$1,385	2.26
Large C&I	7.63%	\$5,510	\$8,517	\$3,006	1.55
GNE	7.63%	\$4,408	\$9,947	\$5,538	2.26
Total	7.63%	\$11,021	\$20,950	\$9,929	1.90

¹ Common costs are not included in this table; they are subsumed in Table 3

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

Table 5. Pa PUC Table 2 - Summary of Portfolio Energy Savings and Demand Reduction

MWh/year and MW Saved for Consumption Reductions	PY8		PY9		PY10		PY11		PY12		Total	
	MWh/year	MW ³	MWh/year	MW ³	MWh/year	MW ³	MWh/year	MW ³	MWh/year	MW ³	MWh/year	MW ^{3,4}
Baseline ¹	38,214,368		38,214,368		38,214,368		38,214,368		38,214,368		38,214,368	
Cumulative Projected Portfolio Savings												
Residential (exclusive of Low-Income)	154,665		308,166		439,070		557,380		656,476		656,476	0
Low-Income	17,575	0	35,835		54,420		73,373		88,147		88,147	0
Small C&I	78,922	0	158,959	11.5	261,226	11.5	364,739	11.5	460,361	11.5	460,361	11.5
Large C&I	45,103	0	92,606	57.5	161,675	57.5	229,365	57.5	297,000	57.5	297,000	57.5
GNE	16,200	0	32,400	46.0	48,600	46.0	64,800	46.0	81,000	46.0	81,000	46.0
EE&C Plan Total	312,465	0	627,966	115.0	964,991	115.0	1,289,657	115.0	1,582,984	115.0	1,582,984	115.0
Estimated Phase II Carryover Savings ⁵												
Total Cumulative Projected Savings Phase III + Estimated Phase II Carryover Savings												
EE&C Plan Total – Percentage of Target to be Met ²	22%		44%		67%		89%		109%		109%	125%
Percent Reduction from Baseline	1%		2%		3%		3%		4%		4%	
Commission Identified Goal ¹											1,443,035	92,000
Percent Savings due to Portfolio Above or Below Commission-Identified Goal											109%	

¹As defined in the June 11, 2015 Implementation Order.

²The June 11, 2015 Implementation Order directed that at least 15% of an EDC’s target amount in each program year.

³Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, therefore, are not included in this table. Cumulative demand reduction from the demand response programs is reported as the average annual reduction.

⁴Total cumulative annual demand reduction from energy efficiency is expected to be approximately 249,194 kW for Phase III.

⁵ PPL Electric expects some carryover for the Low-Income and GNE sectors. See Table 10.

Table 6. Pa PUC Table 3 - Summary of Portfolio Costs

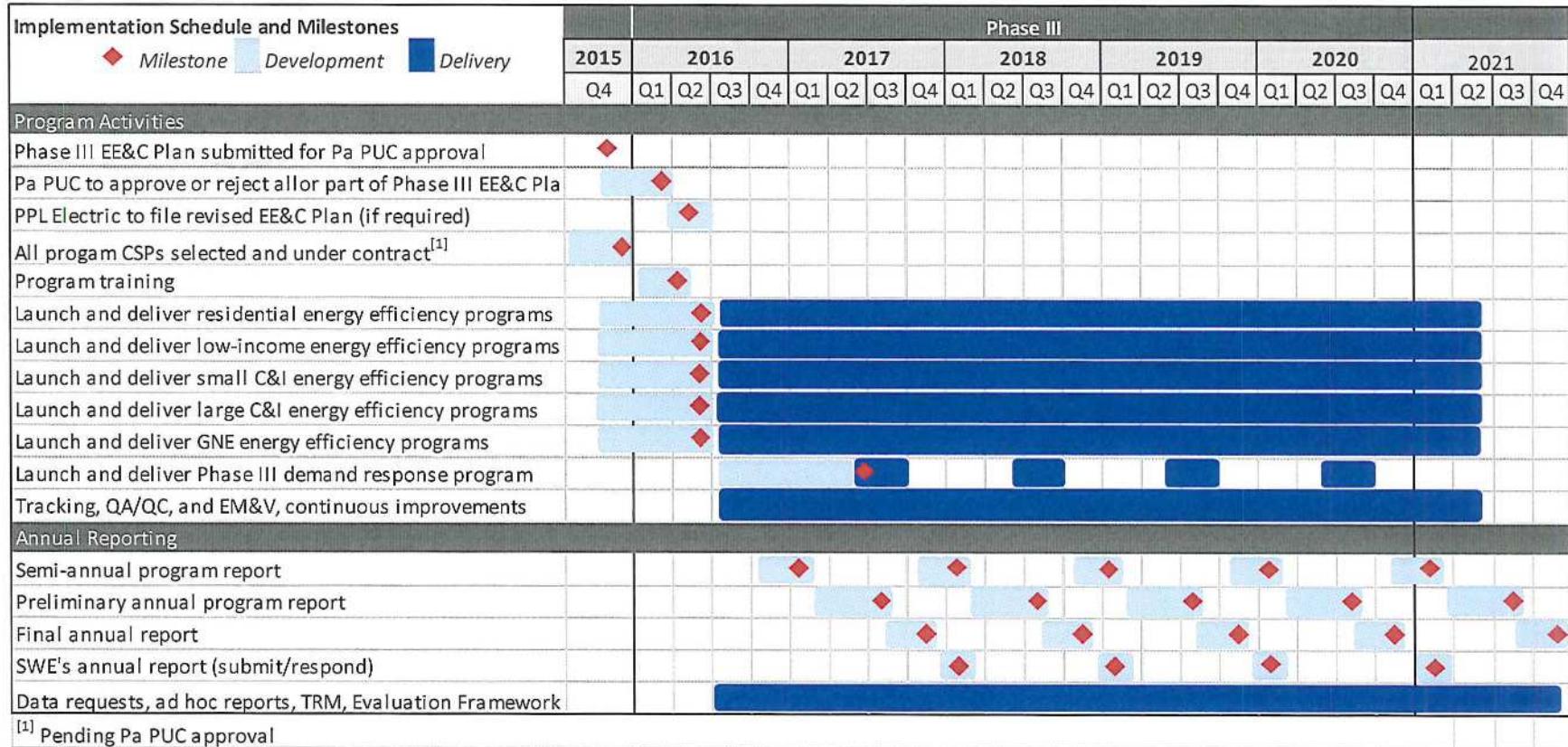
Sector	PY8		PY9		PY10		PY11		PY12	
	\$1000	%	\$1000	%	\$1000	%	\$1000	%	\$1000	%
Residential Annual Budget	\$26,215	42%	\$22,531	38%	\$21,815	32%	\$22,092	32%	\$19,087	35%
Low-Income Annual Budget	\$9,998	16%	\$9,865	17%	\$12,807	19%	\$13,073	19%	\$9,016	17%
Small C&I Annual Budget	\$14,081	23%	\$13,129	22%	\$16,012	23%	\$16,060	23%	\$12,596	23%
Large C&I Annual Budget	\$8,791	14%	\$9,218	16%	\$11,268	17%	\$11,214	16%	\$10,012	18%
GNE Annual Budget	\$3,107	5%	\$3,924	7%	\$6,324	9%	\$6,324	9%	\$3,924	7%
Total Portfolio Annual Budget	\$62,192	100%	\$58,666	100%	\$68,225	100%	\$68,762	100%	\$54,634	100%

¹ Common costs are included in the appropriate sector totals. See Table 92 for allocation of common costs.

1.4 Summary of Program Implementation Schedule

Figure 2 provides a visual summary of PPL Electric’s implementation schedule in accordance with the Commission’s EE&C Plan Template.

Figure 2. PPL Electric Implementation Schedule



1.5 Strategy to Acquire 15% of Consumption Reduction Target Each Program Year

Consistent with the Commission’s Implementation Order, PPL Electric designed its programs to achieve at least 15% of the total consumption reduction target in each program year. The Company directed its CSPs to develop implementation strategies that also reflect this objective. The EE&C Plan includes many measures and programs that will continue from Phase II. PPL Electric has significant experience with those measures and programs and believes it can control the programs’ pace. In addition, PPL Electric designed the EE&C Plan to introduce new measures and delivery channels gradually over time, giving them time to ramp up and gain market acceptance.

PPL Electric will monitor actual performance, adjusting marketing, advertising, incentive levels, and eligible measures to manage participation as necessary.

1.6 Strategy to Manage EE&C Portfolios and Engage Customers and Trade Allies

For its implementation strategy, PPL Electric will rely on a broad range of CSPs, employees, trade allies, community agencies, stakeholders, and other entities engaged in energy efficiency to promote, deliver, and support the effective deployment of programs.

PPL Electric will use three sector-level CSPs (i.e., Residential, Low-Income, and Nonresidential), and one program-specific CSP (i.e., Demand Response) to deliver its portfolio. These CSPs have the primary responsibility to design and deliver the EE&C programs, including marketing, customer care, application and rebate processing, and development and maintenance of effective trade ally networks, although CSPs and PPL Electric will jointly develop marketing plans. In addition, PPL Electric will provide some overarching marketing and customer care for EE&C programs.

PPL Electric based its implementation strategy on an assessment of features needed to engage customers in EE&C programs and encourage them to take energy efficient actions. The engagement approach involves active, ongoing outreach to customers and trade allies. Key strategies include:

- Conducting targeted market research to:
 - Identify marketing channels and tactics most likely to elicit responses from customers and trade allies;
 - Understand drivers, motivations, and challenges to implementing energy efficiency upgrades among specific customer segments and related to common customer characteristics;
 - Develop messaging strategies matched to key customer and trade ally drivers; and
 - Assess customer response to programs and evaluate whether programs are meeting customer needs.
- Offering a range of voluntary customer programs that provide tangible benefits;
- Emphasizing customer service among PPL Electric staff, CSPs, and trade allies;
- Evaluating customer satisfaction and response;
- Modifying programs as necessary to improve programs and customer satisfaction; and

- Coordinating with trade allies, community-based organizations, and other local market participants through outreach, training, and co-marketing so that these partners are aware of PPL Electric programs, are able to effectively articulate program features and benefits to potential customers, and can support customers in their decision to take energy efficiency and demand reduction actions.

In addition to CSPs' and PPL Electric's marketing, the success of Phase III programs will depend on trade allies and other market partners to engage customers, promote programs, evaluate projects, and stock and install energy efficient equipment. The Company's objective is to strike a reasonable balance of costs, ratepayer value, customer choice, quality service, and energy and capacity savings. If necessary to achieve savings objectives, the Company will offer incentives to trade allies who promote, stock, and install efficient measures included in the EE&C Plan.

The Company's objective is to comply with all Act 129 requirements while striking a reasonable balance between costs, ratepayer value, customer choice, quality service, and energy and capacity savings.

1.7 Data Management, Quality Assurance, and Evaluation Processes

The following sections summarize the Company's approach to implementing data management, quality assurance, and evaluation processes.

1.7.1 Data Management

Each CSP's tracking system and PPL Electric's energy efficiency management information system ("EEMIS") allow for program activities to be tracked daily. These systems generate reports and queries to allow ongoing monitoring, management, analysis, and reporting of activities.

1.7.2 Quality Assurance and Quality Control

During planning and design, PPL Electric will establish QA procedures to promote consistency and avoid faults. QC activities and inspection points during the implementation and evaluation phases help guide correcting errors and identifying areas for improvement. Together, QA and QC will improve program performance.

PPL Electric will employ QA/QC procedures at various levels of program implementation, including CSP recruitment and training, data tracking, program operations, and inspections. PPL Electric's QA/QC procedures for Act 129 include:

- Anticipating, detecting, and preventing problems or errors rather than reacting to them;
- Striving to perform work correctly the first time;
- Establishing screening and qualification protocols to confirm that qualified individuals perform all work functions;

- Training staff, CSPs, and trade allies to maintain current knowledge and skills needed for their positions;
- Documenting data collection and QA/QC protocols and conducting a full review of collected data to confirm that the proper data are collected consistently, resources are allocated appropriately, and program performance can be measured accurately;
- Conducting adequate planning, coordination, supervision, and technical direction;
- Defining and developing a clear understanding of job requirements and procedures; and
- Conducting post-installation inspections of an appropriately sized random sample of participants to confirm that program-reported measures were installed, installation followed best practices procedures, and measures function as expected.

A detailed description of PPL Electric's QA/QC protocols and standards is provided in Section 6.

1.7.3 Evaluation Processes

PPL Electric's EM&V CSP will conduct ongoing and annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will develop an evaluation plan ("Evaluation Plan") that describes the EM&V scope of work, objectives, methods, and activities for evaluating program impacts, processes, cost-effectiveness, NTG adjustment, and QA/QC protocols.

The EM&V CSP will develop Evaluation Plans in accordance with SWE Evaluation Framework requirements, and submit them to the SWE for review and approval. PPL Electric and the EM&V CSP will review (at least annually) and may update the Evaluation Plans if changes are made to programs, participation levels, savings levels or Act 129 evaluation requirements.

Evaluations will be conducted by PPL Electric's EM&V CSP. The EM&V CSP will conduct impact evaluations yearly, focused on developing accurate estimates of the programs' actual savings, based on protocols developed by the SWE and the Commission, as summarized in the Evaluation Framework and the Pennsylvania Technical Reference Manual ("TRM"), as well as the Pa PUC's Implementation Order. In process evaluations, the CSP will focus on qualitative assessments of the programs' design, operation, and implementation. The process evaluation also will include an assessment to confirm all data required for the impact evaluation are collected (evaluability assessment). The CSP will conduct cost-effectiveness evaluations yearly to determine the cost-effectiveness of the programs and portfolio (separately for energy efficiency and demand response) using the TRC test method specified by the Commission in its 2016 TRC Test Order. Finally, the CSP will conduct net savings evaluations annually or every other year (depending on the program, program changes, and rebated measures) to determine the net verified savings of each program. Net savings include the effects of free-ridership and spillover. The EM&V CSP may also propose to conduct market effects studies to understand changes in the market and further inform net savings. Guidance for net savings analyses are provided in the Evaluation Framework, with periodic updates from the SWE and the NTG working group.

Over the life of the Phase III EE&C Plan, PPL Electric expects to revisit and revise a number of assumptions to confirm they reflect updated market conditions. PPL Electric will submit required revisions to the Commission for review and approval in accordance with the Commission's requirements for revising EE&C Plans.

1.8 Cost Recovery Mechanism

Act 129 directs each EDC to establish a reconcilable cost recovery tariff mechanism in accordance with 66 Pa. C.S. § 1307 and include this mechanism in its EE&C Plan. 66 Pa. C.S. § 2806.1(b)(1)(i)(H), (k)(1). Attached as Appendix E to the Phase III EE&C Plan is the Company's proposed ACR III, which is a reconcilable adjustment clause under Section 1307 that will recover the estimated program costs PPL Electric expects to incur each program year to achieve its energy consumption and peak demand reduction targets for that program year. Section 7 and Appendix E provide additional information about PPL Electric's ACR III.

2 Energy Efficiency Portfolio/Program Summary Tables and Charts

The following tables provide a quantitative overview of the Phase III Plan. Note that tables in this section are numbered sequentially, but the applicable table formats are based on those provided in the Commission's EE&C Plan Template (as noted below). The table headings include references to the corresponding table numbers provided in the EE&C Plan Template.

Tables in this section include:

- Table 7: **Pa PUC Table 4** - Residential, Commercial and Industrial Small, Commercial and Industrial Large, and Governmental/Educational/Nonprofit Portfolio Summaries
- Table 8: Plan Data - Costs, Cost-Effectiveness, and Savings by Program, Sector and Portfolio
- Table 9: **Pa PUC Table 5** - Budget and Parity Analysis
- Table 10: Summary of Costs and Savings by Program and Customer Sector

2.1 Sector Level Portfolio Summaries

Table 7. Pa PUC Table 4 - Program Summary Residential

	Program Name	Program Market	Program Summary	Program Years Operated	Lifetime MWh Savings	kW Savings	Percentage of Portfolio and Total Lifetime MWh Savings	
							Portfolio MWh Savings %	Lifetime MWh Savings %
Residential Portfolio Programs (exclusive of Low-Income)	Appliance Recycling	All customers (primarily residential)	Free pick up and recycling of inefficient refrigerators, freezers, room air conditioners and possibly dehumidifiers. Incentive paid for each eligible appliance.	PY8-12	525,031	70,024	4.14%	2.74%
	Efficient Lighting	All customers (primarily residential)	Upstream retail promotion and incentives applied to eligible light emitting diode ("LED") bulbs. Other distribution channels include online, mail, directly to customers, welcome kits, etc.	PY8-12	3,714,234	677,740	16.76%	19.40%
	Energy Efficient Home	Existing and new residential single family and multifamily homes	Offers rebates on a wide range of energy efficient measures for retrofit and new construction applications.	PY8-12	914,689	55,003	4.66%	4.78%
	Student Energy Efficient Education	Residential customers: students and teachers	Energy efficiency education targeting primary and secondary grades, including classroom presentations, curriculum, and energy efficiency kits.	PY8-12	263,922	34,312	1.52%	1.38%
	Home Energy Education	Residential single and multifamily	Education, online home energy surveys and Home Energy Reports comparing energy use to other customers in PPL territory, and offering energy efficiency tips.	PY8-12	1,139,691	148,168	14.40%	5.95%
	Totals for Residential Sector					6,557,567	985,247	41.47%

Pa PUC Table 4 - Program Summary – Residential Low-Income

	Program Name	Program Market	Program Summary	Program Years Operated	Lifetime MWh Savings	kW Savings	Percentage of Portfolio and Total Lifetime MWh Savings	
							Portfolio MWh Savings %	Lifetime MWh Savings %
Residential Low-Income Sector Programs	WRAP	Income-qualified single family, multifamily and manufactured homes	Offers a range of free direct install energy efficiency measures to customers whose incomes are at or below 150% of FPIG.	PY8-12	588,080	80,285	3.19%	3.07%
	Energy Efficiency Kits and Education	All income qualified residential customers	Offers free energy efficiency kits and education to customers whose incomes are at or below 150% of FPIG.	PY8-12	310,990	44,731	2.38%	1.62%
	Totals for Low-Income Sector					899,071	125,016	5.57%

Pa PUC Table 4 - Program Summary – Commercial/Industrial Small

	Program Name	Program Market	Program Summary	Program Years Operated	Lifetime MWh Savings	kW Savings	Percentage of Portfolio and Total Lifetime MWh Savings	
							Portfolio MWh Savings %	Lifetime MWh Savings %
Commercial/Industrial Small Portfolio Programs	Efficient Equipment	Small C&I	Provides rebates/incentives for a list of qualified energy efficiency measures.	PY8-12	3,476,121	718,444	15.78%	18.16%
	Custom	Small C&I	Provides rebates/incentives for measures not included in PPL Electric’s other programs. Includes CHP, continuous energy improvement, a behavioral pilot, process upgrades, retro-commissioning, and other measures.	PY8-12	2,602,436	440,642	11.57%	13.59%
	Small C&I Efficient Lighting*	Small C&I	Upstream retail promotion and incentives applied to eligible LED bulbs through the Residential Efficient Lighting Program.	PY8-11	385,714	79,955	1.74%	2.01%
	Demand Response	Small C&I	Offers incentives to eligible customers for reducing demand when called upon to do so.	PY9-12		46,000	0.00%	0.00%
	Totals for C&I Small Sector					6,464,271	1,285,040	29.08%

*To account for cross-sector sales, PPL Electric allocates a portion of costs and savings from the Efficient Lighting (Residential) program to the small commercial sector.

Pa PUC Table 4 - Program Summary – Commercial/Industrial Large

	Program Name	Program Market	Program Summary	Program Years Operated	Lifetime MWh Savings	kW Savings	Percentage of Portfolio and Total Lifetime MWh Savings	
							Portfolio MWh Savings %	Lifetime MWh Savings %
Commercial/Industrial Large Portfolio Programs	Efficient Equipment	Large C&I	Provides rebates/incentives for a list of qualified energy efficiency measures.	PY8-12	1,831,887	247,914	8.45%	9.57%
	Custom	Large C&I	Provides rebates/incentives for measures not included in PPL Electric’s other programs. Includes CHP, continuous energy improvement, a behavioral pilot, process upgrades, retro-commissioning, and other measures.	PY8-12	2,279,672	308,514	10.31%	11.91%
	Demand Response	Large C&I	Offers incentives to eligible customers for reducing demand when called upon to do so.	PY9-12		230,000	0.00%	0.00%
	Totals for C&I Large Sector					4,111,560	786,428	18.76%

Pa PUC Table 4 - Program Summary – Government/Education/Nonprofit

	Program Name	Program Market	Program Summary	Program Years Operated	Lifetime MWh Savings	kW Savings	Percentage of Portfolio and Total Lifetime MWh Savings	
							Portfolio MWh Savings %	Lifetime MWh Savings %
Governmental/Educational/Nonprofit Portfolio Programs	Efficient Equipment	Government, educational, and nonprofit customers	Provides rebates/incentives for a list of qualified energy efficiency measures.	PY8-12	480,276	86,698	2.02%	2.51%
	Custom	Government, educational, and nonprofit customers	Provides rebates/incentives for measures not included in PPL Electric’s other programs. Includes CHP, continuous energy improvement, a behavioral pilot, process upgrades, retro-commissioning, and other measures.	PY8-12	632,808	107,146	3.09%	3.31%
	Demand Response	Government, educational, and nonprofit customers	Offers incentives to eligible customers for reducing demand when called upon to do so.	PY9-12		184,000	0.00%	0.00%
	Totals for GNE Sector					1,113,084	377,844	5.12%

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

Table 8. Costs, Cost-Effectiveness, and Savings Summary (\$1,000)

	Program Name	Total Portfolio Cost ^[1]	Cost Effectiveness (Benefit/Cost Ratio)	Lifetime MWh savings
Residential Sector	Appliance Recycling	\$10,135,768	2.12	525,031
	Efficient Lighting	\$70,019,692	2.17	3,714,235
	Energy Efficient Home	\$61,507,216	0.57	914,689
	Student Energy Efficient Education	\$6,020,418	1.75	263,922
	Home Energy Education	\$8,759,197	5.52	1,139,691
	Common Costs	\$13,376,383	0.00	0
	Residential Sector Total	\$169,818,674	1.57	6,557,568
Low-Income Sector	WRAP	\$34,877,527	0.66	588,080
	Energy Efficiency Kits and Education	\$5,989,288	2.10	310,990
	Common Costs	\$6,555,085	0.00	0
	Low Income Sector Total	\$47,421,900	0.75	899,071
Small C&I Sector	Small C&I Efficient Equipment	\$75,773,718	1.88	3,476,121
	Small C&I Custom	\$51,034,005	1.97	2,602,436
	Small C&I Efficient Lighting	\$6,005,176	2.73	385,714
	Demand Response	\$1,102,068	2.26	0
	Common Costs	\$8,604,567	0.00	0
	Small C&I Sector Total	\$142,519,534	1.84	6,464,271
Large C&I Sector	Large C&I Efficient Equipment	\$46,867,076	1.31	1,831,887
	Large C&I Custom	\$41,242,415	1.84	2,279,672
	Demand Response	\$5,510,349	1.55	0
	Common Costs	\$6,045,740	0.00	0
	Large C&I Sector Total	\$99,665,581	1.46	4,111,560
GNE Sector	GNE Efficient Equipment	\$3,153,081	6.01	480,276
	GNE Custom	\$4,092,870	6.04	632,808
	Demand Response	\$4,408,281	2.26	0
	Common Costs	\$2,825,418	0.00	0
	GNE Sector Total	\$14,479,651	3.70	1,113,084
Portfolio Total		\$473,905,339	1.61	19,145,554

[1] Represents the sum of EDC and customer costs.

2.3 Budget and Parity Analysis

Table 9. Pa PUC Table 5 - Budget and Parity Analysis Summary

Customer Class	Budget (\$1,000)	% of Total EDC Budget	% of Total Budget Excluding Other Expenditures	% of Total Customer Revenue ¹	Difference
Residential	\$111,739	36%	36%		
Residential Low-Income	\$54,758	18%	18%		
Residential Subtotal	\$166,497	53%	53%	45%	8%
C&I Small	\$71,878	23%	23%	32%	-9%
C&I Large	\$50,503	16%	16%	23%	-7%
C&I Subtotal	\$122,381	39%	39%	55%	-16%
GNE	\$23,602	8%	8%	Included in Small & Large C&I	8%
GNE Subtotal	\$23,602	8%	8%		
Residential, C&I, and GNE Subtotal	\$312,479	100%	100%	100%	
Other Expenditures	N/A				
EDC TOTAL	\$312,479				

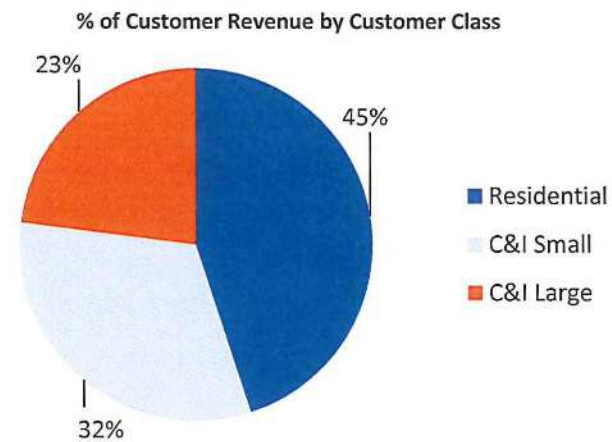
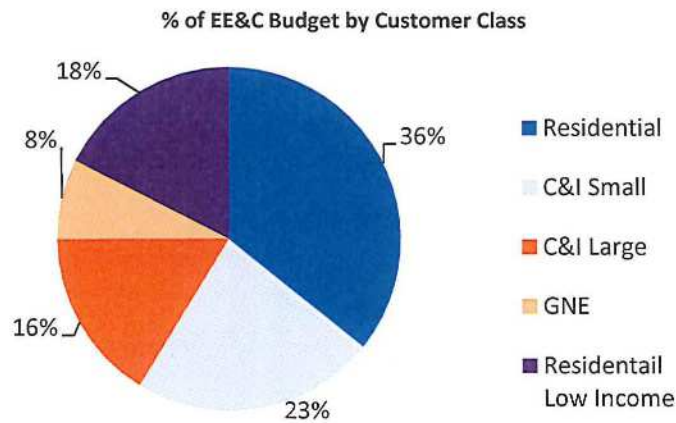


Table 10. Summary of Costs and Savings by Program and Customer Sector

Program	Residential		Low-Income		Small C&I		Large C&I		GNE		Total Cost (\$1000)	Total MWh/yr Reduction ^{4,*}	\$/kWh ³	TRC
	Costs (\$1000)	Savings MWh/yr	Costs (\$1000)	Savings* MWh/yr	Costs (\$1000)	Savings* MWh/yr	Costs (\$1000)	Savings* MWh/yr	Costs (\$1000)	Savings* MWh/yr				
Appliance Recycling	\$11,802	65,522	\$0	0	\$0	0	\$0	0	\$0	0	\$11,802	65,522	\$0.18	2.12
Efficient Lighting	\$32,571	265,302	\$0	0	\$3,766	27,551	\$0	0	\$0	0	\$36,337	292,853	\$0.12	2.21
Energy Efficient Home	\$34,734	73,721	\$0	0	\$0	0	\$0	0	\$0	0	\$34,734	73,721	\$0.47	0.57
Student Energy Efficient Education	\$7,012	23,993	\$0	0	\$0	0	\$0	0	\$0	0	\$7,012	23,993	\$0.29	1.75
Home Energy Education	\$10,208	227,938	\$0	0	\$0	0	\$0	0	\$0	0	\$10,208	227,938	\$0.04	5.52
Low-Income WRAP	\$0	0	\$40,306	50,546	\$0	0	\$0	0	\$0	0	\$40,306	50,546	\$0.80	0.66
Energy Efficiency Kits/Education	\$0	0	\$6,899	37,601	\$0	0	\$0	0	\$0	0	\$6,899	37,601	\$0.18	2.10
Efficient Equipment	\$0	0	\$0	0	\$33,015	249,720	\$16,862	133,803	\$7,052	32,018	\$56,929	415,541	\$0.14	1.77
Custom	\$0	0	\$0	0	\$23,653	183,089	\$19,025	163,197	\$7,175	48,982	\$49,853	395,268	\$0.13	2.09
Demand Response	\$0	0	\$0	0	\$1,530	0	\$7,650	0	\$6,120	0	\$15,299	N/A	\$33,260	1.90
Total - Direct Program Cost	\$96,327		\$47,205		\$61,964		\$43,537		\$20,346		\$269,379			
Percent of Total Direct Costs	36%		18%		23%		16%		8%		100%			
Common Cost Allocation ¹	\$15,412		\$7,553		\$9,914		\$6,966		\$3,255		\$43,100			
TOTAL ESTIMATED COST	\$111,739		\$54,758		\$71,878		\$50,503		\$23,602		\$312,479			1.61
Total Estimated Phase III Reduction ^{2,4}		656,476		88,147		460,361		297,000		81,000		1,582,984		
Estimated Phase II Carryover ⁵				8,400						13,500				
Total Savings (including carryover)				96,547						94,500				
Energy Reduction Target ⁴				79,367						50,507				
\$/kWh (direct & common) for energy efficiency programs only ³	\$0.17		\$0.62		\$0.16		\$0.17		\$0.29				\$0.20	
Total Estimated MW Reduction for DR programs only ⁴						11		57		46		115		
MW Reduction Target*												92		

* Demand response savings are gross verified MW at the generator level (grossed up to reflect T&D line losses)

1. Includes \$5 million SWE costs that are not subject to the cost cap.
2. Savings are for measures installed and operable 6/1/16-5/31/21 and exclude Phase II carryover.
3. Program acquisition cost for energy efficiency programs equals program costs divided by first year's savings. Program acquisition cost for demand response programs equals program costs divided by (MW x 4 years) and is represented in \$/MW-year.
4. MWh/year and MW are on a verified gross basis.
5. Phase II Carryover MWh/year for low-income and GNE are estimated. Actual values will be available in the final PY7 Annual Report on 11/15/16.

3 Program Descriptions

3.1 Process Used for Selection of Programs

3.1.1 Portfolio Objectives and Metrics that Define Success

Portfolio Objectives

PPL Electric designed the Phase III EE&C Plan to meet the requirements set forth by the Commission’s Implementation Order and to achieve a range of additional objectives associated with customer satisfaction and operational efficiency. These objectives are described in detail in Section 1.1.1 of this Plan.

Metrics that Define Success

The primary objectives of the proposed Plan are to meet the requirements of Act 129 and encourage more efficient use of electric power by PPL Electric customers. PPL Electric will monitor its progress in meeting these objectives by tracking specific performance indicators and, when deficiencies are found, identifying corrective action when necessary. The Company will employ a range of EM&V, QA/QC, and data tracking activities to assess and monitor program performance and customer/trade ally satisfaction throughout the Phase III Plan cycle. Table 11 identifies the performance indicators and metrics PPL Electric will use to measure its programs’ success.

Table 11. Key Indicators and Metrics for Monitoring Portfolio Success

Key Indicator	Metrics
Market response	Number of participants Number of measures installed per participant Participation benchmarked against industry norms Feedback from trade allies
Impacts	kWh/year savings Average project size
Customer and trade ally satisfaction	Responses to participant surveys administered as part of QA and/or EM&V
Operating efficiency	Application processing time Incentive processing time Expenditures in each category Acquisition cost (\$/kWh saved)* Levelized cost (\$/kWh saved)*
Cost-effectiveness	TRC benefit/cost ratio

*Acquisition cost is ratio of total EDC expenditures to annual kWh. Levelized cost is the full TRC cost (including participant cost) over lifetime kWh. The levelized cost is the present value of TRC cost divided by levelized lifetime MWh (i.e., \$473,905,339/11,064,152) and is equal to \$0.04283

3.1.2 How Programs Were Constructed

As described earlier, PPL Electric developed separate budgets, savings targets, and performance objectives for five customer sectors: Residential, Low-Income, Small C&I, Large C&I, and GNE, as well as for its demand response programs. To accomplish this, the Company drew on the Phase III Market Potential Studies and its Phase II experience, combined with an analysis of Phase III requirements, including the overall, low-income, GNE, and demand reduction compliance targets (as well as the demand reduction budget suggested by the Pa PUC).

With the sector-level budgets and targets defined, PPL Electric issued RFPs for the design and implementation (i.e., delivery) of residential, nonresidential (including Small C&I, Large C&I, and GNE), low-income, and demand response programs. These RFPs were necessary to confirm that PPL Electric's savings targets and budgets (including the 30% reduction in overall program acquisition cost) were achievable and realistic for each sector, and to confirm the types of programs and measures to include in the EE&C Plan.

At various points in the program development process, the Company met with stakeholders individually and in large groups to seek input, discuss progress, and generate new ideas and perspectives. PPL Electric incorporated the stakeholder input into this EE&C Plan.

Once PPL Electric identified the sector-level eligible measures and program structures and calculated program costs and savings estimates, the Company completed an extensive technical and economic program screening analysis (see Section 8), and examined a number of other factors to determine program-, sector-, and portfolio-level cost-effectiveness. PPL Electric used this analysis as the basis for iteratively adjusting individual elements to balance the portfolio. The objective of this balancing exercise was to provide a reasonable mix of programs that meet all of the Act 129 requirements, including the GNE and low-income set aside targets, the overall cost cap, equity across the various customer segments, and cost-effectiveness at the portfolio level.

The result is a mix of proven energy efficiency and demand response strategies that will enable PPL Electric to reach its program goals within the parameters set forth in Act 129, the Implementation Order and the Clarification Order. Overall, the programs are very similar to the successful programs offered during Phase I and Phase II and were enhanced by the substantial program implementation experience of PPL Electric's sector-level CSPs. This strategy allows PPL Electric and its CSPs to capitalize on the existing programs' momentum and awareness and facilitates the transition from Phase II to Phase III programs (since many customers and trade allies are unaware of Act 129 phases).

This EE&C Plan presents separate programs to establish separate estimates for cost, savings, and cost-effectiveness. However, the delineation of these offerings as separate programs will be largely invisible to customers, especially those in the Residential sector. When residential customers search for information about available energy efficiency measures, PPL Electric will not present those measures and associated applications in terms of a specific program.

For the launch and delivery of programs or components in Phase III, PPL Electric will capitalize on existing activities and relationships with market partners, leverage the relevant sector-level CSP’s delivery experience, and account for the seasonal nature of some programs to achieve its Act 129 goals. To account for program ramping, PPL Electric assigned ramp rates to each program’s participation estimates that account for a gradual increase in customer outreach and acceptance, leading to market adoption rates that are realistic but sufficiently aggressive to support the Company’s goals. For these programs, the Company estimates that participation will start at a low level, increase throughout PY8, and level off to full participation rates that represent expected total saturation by the end of PY9. These assumptions were guided by the SWE Energy Efficiency Market Potential Study and the market characteristics in PPL Electric’s territory, and were tempered by the experience of sector-level CSPs that have offered similar programs in other jurisdictions.

PPL Electric differentiated its programs and estimates (i.e., savings and costs) according to the five customer sectors identified in the EE&C Plan Template. Program eligibility is summarized in Figure 3.

Figure 3. Customer Eligibility by Program



3.1.3 Measures Included in the Portfolio of Programs

The measures to be offered in the Phase III programs are described in Sections 3.2 – 3.5 (see the Eligible Measures and Incentive Strategy section in each program description).

3.1.4 Comprehensive Measures to Be Offered

The Implementation Order directs EDCs to “include at least one comprehensive program for residential customers and at least one comprehensive program for nonresidential customers.”⁸ To satisfy this requirement for residential customers, PPL Electric will continue to offer Low-Income WRAP, which provides energy efficiency education and a comprehensive mix of direct-install efficiency measures for low-income residential customers, including an in-home audit, weatherization, lighting, water heating, HVAC, water conservation, and appliance measures. In addition, PPL Electric will offer the Energy Efficient Home Program, which offers a comprehensive mix of measures for non-low-income residential customers, including weatherization, water heating, lighting (available through the lighting program), HVAC, and appliances. Both low-income and non-low-income residential customers will receive energy efficiency education and will be encouraged to implement multiple measures and take a comprehensive approach to energy efficiency.

To meet the requirement for the nonresidential customers, PPL Electric will offer the Custom Program to each nonresidential customer sector (i.e., Small C&I, Large C&I, and GNE). Through its Custom Program, PPL Electric will provide financial incentives to customers who install any cost-effective project that includes measures that are not in PPL Electric’s other programs, including measures that are not in the TRM. Custom Program measures cover a comprehensive set of nonresidential needs, including new or replacement energy efficient equipment, retro-commissioning, repairs, equipment optimization, building management or industrial process controls, new construction projects, combined heat and power (“CHP”), continuous energy improvement (e.g., behavioral and strategic energy initiatives), and operational and process improvements that result in cost-effective energy efficiency savings. PPL Electric expects CHP to provide at least approximately 10% of the total energy savings for the nonresidential sector. In addition, through its efficient equipment program, PPL Electric offers a comprehensive mix of measures including HVAC, lighting, and water heating that, if installed collectively, provide a comprehensive solution for customers.

⁸ Implementation Order at page 61.

3.2 Residential Sector Programs

The following sections summarize PPL Electric's proposed Residential sector programs. Please note that participation levels, savings, costs, and incentive ranges are estimates.

In addition to the programs outlined in this Plan, PPL Electric will reserve approximately \$3 million in funding for residential pilots and new technologies. This could include items such as whole-home energy management systems, integration of smart thermostats with HVAC devices, limited time offers on efficient HVAC measures, or more cost-effective distribution models for equipment incentives. As in Phase II, PPL Electric will submit details of each pilot to Commission staff and stakeholders prior to implementation.

Appliance Recycling Program

Program Description

Through the Appliance Recycling Program, PPL Electric offers free pick-up and recycling of refrigerators, freezers, room air conditioners, and possibly consumer electronics (without savings or incentive) and dehumidifiers. The Company offers customers a rebate for each recycled appliance, which must be plugged in and functioning when picked up. Room air conditioners, consumer electronics (if offered), and dehumidifiers (if offered) are eligible for pick up with a refrigerator/freezer, but are not eligible as a stand-alone service.

PPL Electric offers scheduling, picking-up, and decommissioning of all units at a site; transporting the materials to a Pennsylvania-based processing center; and disposing of the parts in an environmentally responsible manner. This process involves removing hazardous materials, such as chlorinated fluorocarbons, from the refrigerant and foam insulation, preparing refrigerant for reclamation, and recycling other materials including metal and plastic.

Objectives

The objectives of the Appliance Recycling Program are to:

- Encourage customers to dispose of their existing, inefficient refrigerators, freezers, air-conditioning units, and dehumidifiers in an environmentally responsible manner;
- Reduce the use of secondary, inefficient refrigerators, freezers, and air-conditioning units;
- Enhance relationships with box stores and independent retailers to encourage participation in the “buy new and recycle” component;
- Decommission appliances on-site to prevent resale in a secondary market;
- Promote other PPL Electric energy efficiency programs;
- Achieve a total energy reduction of approximately 65,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Appliance Recycling Program targets residential customers but it is available to customer in all sectors with working, residential-grade refrigerators, freezers, and/or room air-conditioning units. In addition, PPL Electric encourages landlords and multifamily property managers/owners in its service territory to recycle refrigerators and freezers located in their tenant units.

Implementation Strategy

The Residential CSP will manage the program, with support from a subcontractor that specializes in appliance recycling who will deliver the program to customers, including scheduling, picking up appliances, decommissioning, recycling components, training retailer staff to promote the program, and tracking data. The Residential CSP will also support sector-level program functions, including operating a customer call center, marketing and advertising, processing incentives, and tracking program activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 12 presents market risks associated with the Appliance Recycling Program, as well as strategies PPL Electric will use to manage each risk.

Table 12. Appliance Recycling Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Convenient time required for customer to be available for pick-up	Customer may have the interest to recycle but not have the available time	Residential CSP works with customers to provide a pick-up that is as convenient as possible. On a case-by-case basis, special pick-up times may be arranged to meet customer needs.
Lack of program awareness among customers	Customer participation might be low	Residential CSP manages a robust marketing strategy, including distributing materials at community events and to retailers and community based organizations (“CBOs”), as well as running a media campaign and designing PPL Electric bill inserts.
Customer may not see the benefit of recycling qualified appliance(s)	Customer disposes of units through channels other than this program	Residential CSP works with retailers where new units are sold to display information about the benefits of recycling. PPL Electric offers free pick-up services plus an incentive to encourage customers to recycle appliances.

Anticipated Costs to Participating Customers

There are no direct costs incurred by customers in this program.

Ramp-up Strategy

The Appliance Recycling Program is an existing, mature program being carried forward from Phase II. The Residential CSP will develop marketing material to facilitate the transition to Phase III.

Marketing Strategy

PPL Electric’s staff will work with the Residential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program through “Connect,” bill inserts, Home Energy Reports (“HERs”), the energy efficiency hub, and e-mail blasts;
- Providing online access to the program via the EE&C program website;
- Distributing program materials at community events and to CBOs;
- Advertising through multiple channels;
- Educating retailer staff and customers through in-store events;
- Distributing point-of-purchase materials to local retailers;
- Training local retailer store staff to cross-promote the program when customers purchase a new refrigerator; and
- Conducting targeted outreach to PPL Electric customers that submit a refrigerator rebate application.

Eligible Measures and Incentive Strategy

Qualified customers receive free pick-up and disposal, as well as an incentive for recycling working refrigerators, freezers, room air conditioners, and possibly consumer electronics (without savings or incentives) and dehumidifiers. Room air conditioners, consumer electronics, and dehumidifiers may be picked up along with a qualified refrigerator or freezer, but are not eligible for pick-up up as stand-alone items.

Table 13 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges.

Table 13. Appliance Recycling Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range*
Refrigerator	Working unit Tiered incentives based on age of unit > 10 cubic feet and ≤ 30 cubic feet	\$20 - \$75
Freezer	Working unit > 10 cubic feet and ≤ 30 cubic feet	\$20 - \$75
Room air conditioner	Working unit removed from mounting	\$10 - \$25
Consumer electronics	Must fit inside accompanying, recycled refrigerator/freezer	N/A
Dehumidifier	Eligibility requirements contingent upon approval of TRM protocol	\$10 - \$25

* PPL Electric may offer other forms of incentives of equivalent value, such as LEDs, advanced power strips, or other measures at no cost to the participant.

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, the complexity of information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the recycling of older equipment, the installation of multiple measures, or a more comprehensive whole home/facility approach.

Deadline for Rebate Applications

There is no rebate application for this program.

Program Start Date with Key Schedule Milestones

The Appliance Recycling Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 14 lists the estimated key schedule milestones for the Appliance Recycling Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 14. Appliance Recycling Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

EM&V requirements will be detailed in PPL Electric’s Evaluation Plan, which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE’s Evaluation Framework. As part of this process, the EM&V CSP will review a sample of participant rebate applications and Residential CSP records to verify the quantity, efficiency level, and qualifying equipment. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Appliance Recycling Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Administrative Requirements

The Residential CSP will provide overall administrative and operational management of the Appliance Recycling Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

Table 15 shows order of magnitude participation estimates for the Appliance Recycling Program. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Table 15. Appliance Recycling Program Projected Participation

Measure	PY8	PY9	PY10	PY11	PY12	Total
Freezers Recycling	2,200	2,200	2,200	2,200	2,933	11,733
Leave Behind LED, in lieu of a cash incentive	5,473	5,473	5,473	5,474	0	21,893
Room A/C Recycling	917	917	917	917	1,222	4,890
Refrigerator Recycling	8,798	8,798	8,798	8,798	11,731	46,923
Total	17,388	17,388	17,388	17,389	15,886	85,439

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 16 displays estimated program savings and costs by program year and in total. Approximately 12% of the Residential sector budget is attributed to the Appliance Recycling Program.

Table 16. Appliance Recycling Program Costs and Benefits by Program Year (\$1000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	13,120	12,734	12,358	11,994	15,316	65,522
Demand Reduction (MW)*	1.78	1.73	1.68	1.63	2.07	8.88
Total TRC Costs	\$2,113	\$2,108	\$2,345	\$2,431	\$2,806	\$11,802
Participant Costs	\$00	\$00	\$00	\$00	\$00	\$00
Direct Utility Costs	\$2,113	\$2,108	\$2,345	\$2,431	\$2,806	\$11,802
Customer Incentives	\$433	\$428	\$433	\$439	\$628	\$2,362
EDC Labor, Materials, Supplies	\$59	\$59	\$59	\$59	\$59	\$296
CSP Labor, Materials, Supplies	\$1,461	\$1,443	\$1,669	\$1,708	\$1,836	\$8,116
CSP Marketing	\$159	\$178	\$183	\$225	\$282	\$1,027

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Appliance Recycling Program is projected to be cost-effective, with a TRC test ratio of 2.12. Table 17 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 60%.

Table 17. Appliance Recycling Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$21,471
NPV Costs	\$10,136
Net Benefits	\$11,335
Benefit/Cost Ratio	2.12

Efficient Lighting Program

Program Description

Through the Efficient Lighting Program, PPL Electric primarily encourages residential customers to purchase and install LED bulbs.⁹ Participating customers will be able to purchase a variety of discounted LED bulbs at local retail stores. The Residential CSP will manage program operations and provide support to participating retailers and manufacturers that promote and sell program-eligible bulbs.

Objectives

The objectives of the Efficient Lighting Program are to:

- Provide a mechanism for customers to easily obtain discounted LED bulbs in local retail stores;
- Achieve widespread visibility through independent and regional retailers that carry program-eligible LED bulbs;
- Develop and execute strategies aimed at transforming the market for LED bulbs;
- Educate customers on new lighting technologies;
- Engage retailers by educating and training retail sales associates about LED bulbs;
- Obtain approximately 293,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Efficient Lighting Program targets residential customers, but it is available to all PPL Electric customers.

Implementation Strategy

The Residential CSP will administer the program by managing retailer/manufacturer recruitment, delivering incentives to participating energy efficient light bulb manufacturers, providing marketing and educational support, and overseeing marketing and product placement in retail stores. The Residential CSP will also support sector-level program functions, including operating a customer call center, managing marketing and branding guidelines, and tracking activities. PPL Electric's energy efficiency staff will provide overall strategic direction and program management. The selected EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 18 presents market risks associated with the Efficient Lighting Program, as well as strategies PPL Electric will use to manage each risk.

⁹ Based on actual results from Phase II, PPL Electric estimated a portion of costs and savings associated with the Efficient Lighting Program for the Small C&I sector due to cross-sector sales. The actual costs and savings for the Small C&I sector will be determined by the EM&V CSP during the annual evaluation.

Table 18. Efficient Lighting Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Cost of energy efficient bulbs may be higher than the customer is willing to pay	<ul style="list-style-type: none"> • Low sales translating to low savings • Customers may not be willing to purchase new, more efficient light bulbs if their current light bulbs are functioning • Economic conditions may limit customers’ ability to purchase energy efficient bulbs 	<ul style="list-style-type: none"> • PPL Electric offers incentives to offset the cost of efficient bulbs at retail locations. PPL Electric will likely use other distribution channels such as offering free bulbs at customer give-away events, free bulbs for completing an online energy survey or customer profile, and in welcome kits for new customers. • PPL Electric educates customers on the long-term energy cost-saving benefits of higher efficiency lighting measures.
Lack of customer awareness about energy usage associated with different types of bulbs	Customers do not see a need to use more efficient bulbs	Residential CSP manages a robust marketing and education strategy, including point-of-sale promotions and discounts.
Reduction in savings due to increasing Energy Independence and Securities Act of 2007 (“EISA”) standards	Higher acquisition costs	PPL Electric determines the proper product mix to offset the savings changes for specific bulbs while optimizing the program’s energy savings, given budget constraints.
Energy efficient bulb performance	Customer may not purchase energy efficient bulbs if they perceive that the bulbs do not perform well	Residential CSP conducts ongoing communication with retailers, including training, outreach, and education.
Changing technology may affect lifecycle cost	Customer decision-making process may change as new technology becomes available in the market	PPL Electric adds new programs/ measures as efficiency improves.

Anticipated Costs to Participating Customers

Although the program incentives will cover a portion of the efficient products’ incremental costs, participating customers will be responsible for the remaining costs of the purchased LED bulbs. Customer-incurred costs will vary by bulb type.

Ramp-up Strategy

The Efficient Lighting Program is an existing, mature program being carried forward from Phase II. The Residential CSP will develop marketing material to facilitate the transition to Phase III.

Marketing Strategy

PPL Electric’s staff will work with the Residential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program through “Connect,” bill inserts, HERs, the energy efficiency hub, and e-mail blasts;
- Providing online access to the program via the EE&C program website;
- Advertising through multiple channels;
- Educating retailer staff and customers through in-store events;
- Distributing point-of-purchase materials to local retailers;
- Collaborating with ENERGY STAR® and lighting manufacturers; and
- Cross-promoting the lighting program in other energy efficiency program educational materials.

Eligible Measures and Incentive Strategy

Table 19 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges. In general, the incentives provided at the retail level are designed to cover approximately 25% to 50% of the retail cost of LEDs.

Table 19. Efficient Lighting Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range*
LED General Service	General purpose, dimmable, or three-way 250- 2,600 lumens	\$1.00- \$6.00
LED Specialty	Decorative, mini-base, or globe 250- 2,600 lumens	\$2.00- \$7.00
LED Reflectors	Reflectors or outdoor 250- 2,600 lumens	\$2.00- \$8.00
LED Fixtures	Downlight fixture ≥ 400 lumens	\$2.00- \$8.00

* Some delivery channels, such as give-away promotions and LEDs in new customer welcome kits, may provide LEDs at no cost to the customer.

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, the complexity of information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets.

Deadline for Rebate Applications

PPL Electric offers Efficient Lighting Program incentives at the point of sale; therefore, there is no rebate application.

Program Start Date with Key Schedule Milestones

The Efficient Lighting Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 20 lists the estimated key schedule milestones for the Efficient Lighting Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 20. Efficient Lighting Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will verify savings attributable to this program, including sales to nonresidential customers (known as cross-sector sales). The EM&V CSP will verify bulb quantities and savings for lighting distributed through other channels (such as giveaways or in welcome kits), where the specific participant is known. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Efficient Lighting Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Administrative Requirements

The Residential CSP will provide overall administrative and operational management of the Efficient Lighting Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates delivering an average of approximately 1,722,000 energy efficient LED bulbs through the Efficient Lighting Program. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 21 displays anticipated program benefits and costs by program year and in total. Approximately 34% of the Residential sector budget is attributed to the Efficient Lighting Program.

Table 21. Efficient Lighting Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	88,864	84,566	57,357	34,515	0	265,302
Demand Reduction (MW)*	16.22	15.43	10.47	6.30	0.00	48.41
Total TRC Costs	\$36,579	\$21,383	\$10,689	\$5,307	\$120	\$74,079
Participant Costs	\$23,753	\$12,195	\$4,294	\$1,266	\$0	\$41,507
Direct Utility Costs	\$12,826	\$9,188	\$6,395	\$4,042	\$120	\$32,571
Customer Incentives	\$11,240	\$7,738	\$4,634	\$2,422	\$0	\$26,034
EDC Labor, Materials, Supplies	\$120	\$120	\$120	\$120	\$120	\$600
CSP Labor, Materials, Supplies	\$1,190	\$1,022	\$1,422	\$1,268	\$0	\$4,901
CSP Marketing	\$276	\$308	\$219	\$232	\$0	\$1,036

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Efficient Lighting Program is projected to be cost-effective, with a TRC test ratio of 2.17. Table 22 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 75%.

Table 22. Efficient Lighting Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$151,692
NPV Costs	\$70,020
Net Benefits	\$81,672
Benefit/Cost Ratio	2.17

Energy Efficient Home Program

Program Description

Through the Energy Efficient Home Program, PPL Electric provides comprehensive energy efficiency options for new and existing homes. The Company offers a range of energy efficient measures, rebates, education, and services that help PPL Electric customers increase their home's efficiency. The program includes three components:

- **A new homes component** that encourages the construction of energy efficient new homes through a rebate to builders or homeowners who exceed the energy efficiency performance required by current building codes in newly constructed homes.
- **An online audit and weatherization component**,¹⁰ for which, based on audit recommendations, customers may qualify for insulation and duct sealing rebates, and will learn about the benefits of other energy efficiency measures such as appliance recycling, lighting, HVAC, water heating, etc. Customers who participate in the online energy audit will also receive an energy efficiency kit.
- **An energy efficiency equipment component** through which PPL Electric provides rebates for measures such as high-performance heat pumps, heat pump water heaters, pool pumps, and central air conditioning units.

The Company will provide builders and customers with one central point of entry for program participation. The Residential CSP will implement the program by maintaining a call and rebate processing center, recruiting and educating trade allies, and marketing the program to provide sufficient program participation.

Objectives

The objectives of the Energy Efficient Home Program are to:

- Encourage customers to view energy efficiency in a holistic manner;
- Provide customers with education, audits, surveys, and energy-saving solutions;
- Promote the construction of energy efficient new homes;
- Educate construction industry professionals and other trade allies about the benefits of energy efficient homes;
- Reduce energy consumption by approximately 73,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

¹⁰ During the first half of PY8, PPL Electric will continue to offer customers rebates for in-home professional energy audits. After that period, PPL Electric will discontinue rebates for home energy audits, instead encouraging customers to participate in a free, online energy audit.

Target Market

The Energy Efficient Home Program is targeted to residential homebuilders and customers residing in single family and individually-metered multifamily homes. Customers residing in a rental property must have the owner/landlord's approval to participate.

Implementation Strategy

The Residential CSP will deliver the Energy Efficient Home Program to customers and homebuilders, including marketing, participant recruitment, and trade ally recruitment and support. Because the program consists of three separate offerings, trade ally support will vary by program component:

- **New homes:** The Residential CSP's responsibilities will include identifying, recruiting, and training potential builders; assisting new home builders with paperwork; answering program-specific questions; testing new home performance; and issuing incentives to builders and homeowners.
- **Audit and weatherization:** The Residential CSP's responsibilities will include hosting and maintaining the online program energy audit tool; distributing kits; identifying, recruiting, and training HVAC contractors; forming and maintaining a trade ally network; and answering program-specific questions.
- **Energy efficient equipment:** The Residential CSP's responsibilities will include working with retailers, trade allies, and manufacturers to promote program energy efficient equipment.

The Residential CSP will also support sector-level program functions, including operating a customer call center, managing marketing and advertising, processing incentives to customers, and tracking activities. PPL Electric's energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 23 presents market risks associated with the Energy Efficient Home Program, as well as strategies PPL Electric will use to manage each risk.

Table 23. Energy Efficient Home Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Efficiency is not a common priority for builders and customers	Builders do not take advantage of rebates, resulting in lower savings	Residential CSP educates builders on the value and benefits associated with energy efficiency.
Builders may not abide by the efficient building practices required to qualify for the rebate	Builders may choose cheaper, less efficient equipment/building practices	Residential CSP educates builders on the performance standards and building practices required to qualify for program rebates.
<ul style="list-style-type: none"> • Economic environment may limit builders’ and customers’ ability to purchase energy efficient equipment and appliances because: • High-efficiency equipment is viewed as too expensive • There is little incentive to upgrade equipment that is still operational, or to weatherize a home 	Builders or customers may choose to install cheaper, less efficient equipment	<ul style="list-style-type: none"> • Residential CSP conducts robust program marketing and provides general energy efficiency information to customers. • PPL Electric offers rebates that help reduce incremental costs. • Residential CSP educates customers on the long-term energy cost-saving benefits of higher-efficiency equipment and home weatherization.

Anticipated Costs to Participating Customers

Costs incurred by Energy Efficient Home Program participants will vary by program component and the type of qualifying equipment installed through the program.

Ramp-up Strategy

The Energy Efficient Home Program is an existing, mature program being carried forward from Phase II. The Residential CSP will develop marketing material to facilitate the transition to Phase III.

Marketing Strategy

PPL Electric’s staff will work with the Residential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program through “Connect,” bill inserts, HERs, the energy efficiency hub, and e-mail blasts;
- Providing online access to the program via the EE&C program website;
- Advertising through multiple channels;
- Identifying builders through collaboration with state and regional builders’ associations and providing them with program details;
- Educating retailer staff and customers through in-store events;
- Distributing point-of-purchase materials to local retailers; and
- Recruiting and training retailers on qualifying technology, rebates, and cross-promotion.

Additionally, the Residential CSP will conduct outreach to previously participating and new trade allies (i.e., retailers, manufacturers, distributors, homebuilders, and contractors) to provide them with rebate information, educate them on Phase III program changes, and offer ongoing program support.

Eligible Measures and Incentive Strategy

Table 24 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges.

Table 24. Energy Efficient Home Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range
Refrigerator	ENERGY STAR	\$10-\$75
	ENERGY STAR Most Efficient	\$20-\$100
Heat pump water heater	≥ 2.3 EF	\$200-\$500
Non-electric high efficiency central heat (gas, oil, propane). Maximum of 250 units across all customer sectors/programs	Natural gas or propane – AFUE 95 Oil furnace – AFUE 85 Fossil Fuel Boilers – AFUE 85	\$200-\$300
Smart thermostat	To be determined	\$50-\$250
Manufactured Home	ENERGY STAR	\$1,500
Air source heat pump	≥ 16 SEER	\$100-\$800
Ductless heat pump	≥ 15 SEER	\$100-\$350/ton
Central air conditioner	≥ 15 SEER	\$100-\$400
Pool pump	Variable speed	\$200-\$350
Attic and wall insulation	Home has electric main source heat or central air conditioning. Minimum of R11 above code installed	75% of installed cost, up to \$750 each insulation type
Air sealing	Home has electric main source heat or central air conditioning.	Up to \$200 per home
Trade ally SPIFF	N/A	\$20-\$200
Professional home energy audit	Home has electric main source heat or central air conditioning. Only available during first six months of PY8	\$20-\$250
New home	ENERGY STAR and/or HERS-rated	Up to \$2,500

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of information required by customer, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the installation of multiple measures, or a more comprehensive whole

home/facility approach. PPL Electric plans to work with other EDCs and stakeholders to offer a consistent new home construction delivery mechanism.

Deadline for Rebate Applications

The program rebate application will list the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock in the stipulated incentive level and guarantee project funding.

Program Start Date with Key Schedule Milestones

The Energy Efficient Home Program is currently offered in Phase II as the Home Comfort Program and the Residential Efficient Equipment Program, and PPL Electric will facilitate the transition to the Phase III program. Table 25 lists the estimated key schedule milestones for the Energy Efficient Home Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 25. Energy Efficient Home Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will review a sample of participant rebate applications and Residential CSP records to verify the quantity, efficiency level, and qualifying equipment. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Energy Efficient Home Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Through the Energy Efficient Home Program, PPL Electric offers incentives for new home construction, home energy audits, and a variety of weatherization and equipment, each requiring an evaluation approach specifically tailored to the product. As part of the savings verification and evaluation, the EM&V CSP will review a sample of participant rebates and Residential CSP records to verify the quantity, efficiency level, and rebate qualifications based on measure type. Because the Company offers a variety of program equipment and services, the EM&V CSP will stratify the verification sample accordingly, designating a sample size appropriate for each stratum and technology. Overall, the sample size will

meet the level of rigor specified in Evaluation Framework, which is likely 85/15 (confidence/precision) at the program level, the same as it was in Phase II.

Administrative Requirements

The Residential CSP will provide overall administrative and operational management of the Energy Efficient Home Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric estimates approximately 150,000 measures will be installed through this program during Phase III. PPL Electric estimates approximately 50,000 to 100,000 customers will participate, depending on the number of measures they choose to install per project, PPL Electric has estimated the total savings for this program to be approximately 73,000 MWh/year. PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 26 displays anticipated program benefits and costs by program year and in total. Approximately 36% of the Residential sector budget is attributed to the Energy Efficient Home Program.

Table 26. Energy Efficient Home Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	7,357	9,941	14,408	19,454	22,561	73,721
Demand Reduction (MW)*	0.66	0.85	1.07	1.22	1.25	5.04
Total TRC Costs	\$8,651	\$9,773	\$14,371	\$18,804	\$21,859	\$73,458
Participant Costs	\$3,545	\$4,651	\$7,721	\$9,939	\$12,868	\$38,724
Direct Utility Costs	\$5,106	\$5,123	\$6,650	\$8,864	\$8,991	\$34,734
Customer Incentives	\$1,703	\$2,018	\$3,092	\$4,782	\$5,372	\$16,967
EDC Labor, Materials, Supplies	\$119	\$119	\$119	\$119	\$119	\$593
CSP Labor, Materials, Supplies	\$3,093	\$2,772	\$3,159	\$3,626	\$3,139	\$15,790
CSP Marketing	\$191	\$213	\$280	\$338	\$362	\$1,384

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Energy Efficient Home Program is not projected to be cost-effective, with a TRC test ratio of 0.57. Although this program is not expected to be cost-effective, PPL Electric believes it is important to offer this type of program and its related measures to customers, especially to help promote a comprehensive approach to energy efficiency. Table 27 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 65%.

Table 27. Energy Efficient Home Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$34,865
NPV Costs	\$61,507
Net Benefits	(\$26,642)
Benefit/Cost Ratio	0.57

Student Energy Efficient Education Program

Program Description

Through the Student Energy Efficient Education Program, PPL Electric offers energy efficiency kits and education to students and teachers. The program consists of three separate components:

- **Primary Grade Energy Efficiency Education**, in which the Company offers an interactive classroom presentation to students in grades 2-3.
- **Intermediate Grade Energy Efficiency Education**, in which the Company offers an interactive classroom presentation to students in grades 5-7.
- **Secondary Grade Energy Efficiency Education**, in which the Company offers an interactive classroom presentation to students in grades 9-12.

For all three components, the presentation educates students about energy and conservation topics using hands-on activities. The presentation content is correlated to Pennsylvania Education Academic Standards for the appropriate grade levels and endorsed by the Pennsylvania Department of Education. Students that participate in the presentation receive a take-home energy efficiency kit.

During Phase III, the Company will aim to drive students and their families to the Customer Engagement Hub (“Hub”) for follow-up educational activities (e.g., completing an online home energy audit). PPL Electric will also provide participating teachers with energy efficiency measures, such as a smart power strip, to use as instructional aides to educate students about energy efficiency.

Objectives

The objectives of the Student Energy Efficient Education Program are to:

- Expand and promote energy efficiency literacy through education outreach programs;
- Provide energy efficiency education to students offered through school assemblies and classroom curriculum;
- Confirm energy efficiency education correlates to Pennsylvania Education Academic Standards;
- Provide students and teachers with a take-home kit of energy efficiency measures that can be installed at home;
- Provide teachers with energy efficiency information, lesson plans, activities, training, materials, and support for classroom use;
- Obtain participation by approximately 115,000 students and teachers through 2021, and approximately 24,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

PPL Electric targets the Student Energy Efficient Education Program to residential customers throughout its service territory by using schools as an outreach mechanism.

Implementation Strategy

The Residential CSP will deliver the program to schools, having sole responsibility for marketing to and recruiting potential schools and teachers; creating curriculum correlated to Pennsylvania Education Academic Standards; securing program endorsement by the Pennsylvania Department of Education; conducting the various energy efficiency presentations; and assembling and shipping the take-home energy efficiency kits.

The Residential CSP will also support sector-level program functions, including operating a customer call center, managing marketing and branding guidelines, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 28 presents market risks associated with the Student Energy Efficient Education Program, as well as strategies PPL Electric will use to manage each risk.

Table 28. Student Energy Efficient Education Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Teachers may not have the time in their schedules to incorporate the presentations	Lesson plans are often created far in advance and teachers may not see value in the presentation, and therefore may not participate	Residential CSP ensures that the curriculum is correlated to the PA Education Academic Standards and fits into teachers’ existing lesson plans.
Customers do not install the energy efficiency measures or complete the survey included in their take-home kits	Although the program education component would be completed, measurable energy savings would not be achieved	<ul style="list-style-type: none"> • Residential CSP provides instructions on how to install the devices in the kits. • Residential CSP manages a customer service call center for participants who have questions about the kits or how to install the measures.

Anticipated Costs to Participating Customers

There are no direct costs incurred by customers in this program.

Ramp-up Strategy

The Student Energy Efficient Education Program is an existing, mature program being carried forward from Phase II. The Residential CSP will develop marketing material to facilitate the transition to Phase III.

Marketing Strategy

To recruit teachers and schools to participate in the Student Energy Efficient Education Program, the Residential CSP will work with PPL Electric staff to secure a list of qualified schools within the PPL Electric service territory. The Residential CSP will issue program promotional materials directly to potential participants via e-mail and direct mail.

Eligible Measures and Incentive Strategy

Participants in each component receive a take-home energy efficiency kit that includes a variety of low-cost measures, such as LEDs. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications as warranted by changing market conditions or to manage program delivery, participation, and budgets.

Deadline for Rebate Applications

PPL Electric offers the Student Energy Efficient Education Program services at no cost to customers; therefore, there is no rebate application.

Program Start Date with Key Schedule Milestones

The Student Energy Efficient Education Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 29 lists the estimated key schedule milestones for the Student Energy Efficient Education Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 29. Student Energy Efficient Education Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will review a sample of Residential CSP records and student surveys, and will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Student Energy Efficient Education Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Through the Student Energy Efficient Education Program, PPL Electric offers classroom training for students and delivers energy conservation kits free of charge to participants. Typically, the energy efficiency kits include a paper/online survey that students complete. As part of the evaluation, the EM&V CSP will analyze data collected from all returned student surveys.

Administrative Requirements

The Residential CSP will provide overall administrative and operational management of the Student Energy Efficient Education Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

Table 30 shows order of magnitude participation estimates of for the Student Energy Efficient Education Program by measure. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Table 30. Student Energy Efficient Education Program Projected Participation

Measure	PY8	PY9	PY10	PY11	PY12	Total
Schools - Intermediate Kit	14,000	14,000	14,000	14,000	14,000	70,000
Schools - Primary Kit	5,000	5,000	5,000	5,000	0	20,000
Schools - Secondary Kit	5,000	5,000	5,000	5,000	5,000	25,000
Total	24,000	24,000	24,000	24,000	19,000	115,000

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 31 displays anticipated program benefits and costs by program year and in total. Approximately 7% of the Residential sector budget is attributed to the Student Energy Efficient Education Program.

Table 31. Student Energy Efficient Education Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	5,180	5,180	5,180	5,180	3,274	23,993
Demand Reduction (MW)*	0.67	0.67	0.67	0.67	0.43	3.12
Total TRC Costs	\$1,243	\$1,271	\$1,390	\$1,419	\$1,689	\$7,012
Participant Costs	\$00	\$00	\$00	\$00	\$00	\$00
Direct Utility Costs	\$1,243	\$1,271	\$1,390	\$1,419	\$1,689	\$7,012
Customer Incentives	\$00	\$00	\$00	\$00	\$00	\$00
EDC Labor, Materials, Supplies	\$40	\$40	\$40	\$40	\$40	\$198
CSP Labor, Materials, Supplies	\$1,054	\$1,065	\$1,180	\$1,183	\$1,388	\$5,870
CSP Marketing	\$149	\$166	\$171	\$197	\$262	\$944

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Student Energy Efficient Education Program is projected to be cost-effective, with a TRC test ratio of 1.75. Table 32 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 32. Student Energy Efficient Education Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$10,537
NPV Costs	\$6,020
Net Benefits	\$4,516
Benefit/Cost Ratio	1.75

Home Energy Education Program

Program Description

For the Home Energy Education Program, PPL Electric focuses on educating customers about behaviors and measures they can adopt to reduce energy consumption in their homes. The program's education and awareness is separate from the advertising and promotion of PPL Electric's specific energy efficiency programs.

Through the program, the Residential CSP will send residential, high energy-use customers a series of HERs, which will likely contain the following types of information.

- A comparison of recipients' usage to that of other, comparable customers in the same geographical area.
- Energy efficiency education and recommendations, such as turning down the thermostat, turning off the lights, taking shorter showers, and information about energy efficiency measures such as LEDs, weatherization, smart thermostats, smart strips, appliances, water heaters, HVAC, recycling old refrigerators, etc. Where practical, these recommendations will be personalized for each home, especially if the participant has completed an online energy profile.
- Messaging to encourage recipients to visit the Hub and complete an online energy profile/survey.

Customers can opt-out of the program if they no longer wish to receive the HERs. The Residential CSP will identify customers that do not engage in any energy-saving actions and categorize them as low propensity participants. The Residential CSP will flag these customers for potential removal from the program. Customers who are identified as low propensity and removed from the program will have to opt-in to continue receiving HERs.

Objectives

The objectives of the Home Energy Education Program are to:

- Encourage customers to adopt energy efficient behaviors and install high-efficiency measures;
- Help customers become more aware of how their behavior and practices affect energy usage;
- Educate customers about no- and low-cost measures and behavior changes that may reduce energy consumption;
- Educate customers about PPL Electric's online resources;
- Promote other PPL Electric energy efficiency programs;
- Obtain participation by approximately 128,000 customers through 2021, and obtain approximately 228,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

PPL Electric targets the Home Energy Education Program to residential customers with high energy consumption.

Implementation Strategy

The Residential CSP will deliver the program to customers, including identifying a pool of potential HERs recipients (i.e., treatment and control groups), developing and delivering HERs to the treatment group (i.e., customers who receive HERs), and tracking program outcomes. The Residential CSP will also support sector-level program functions, including operating a customer call center, marketing, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 33 presents market risks associated with the Home Energy Education Program, as well as strategies PPL Electric will use to manage each risk.

Table 33. Home Energy Education Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
A large number of customers may opt-out of the program	Fewer customers participating in the program would negatively affect energy savings	<ul style="list-style-type: none"> • Residential CSP monitors opt-outs on a monthly basis to ensure the number of participating customers remains at an acceptable level. • Residential CSP ensures there is a pool of customers available who meet the selection criteria to receive HERs to maintain program participation.
Customers do not change behavior based on recommended tips	Tips do not resonate with customers and they do not change their behavior	<ul style="list-style-type: none"> • Residential CSP monitors savings on a monthly basis. • Residential CSP adjusts and changes HER messaging if monthly savings do not meet targets.
Customers think like-household comparisons are not accurate	Customers disregard HER information as incorrect and do not change their behavior	<ul style="list-style-type: none"> • Residential CSP allows customers to call or use the online HERs located on PPL Electric’s website and the Hub to modify the information about their household. • Residential CSP periodically reviews the accuracy of the data used in household comparisons to determine if there is additional public information available, and/or if there are other ways to increase the accuracy of customer data (e.g., heating source).

Anticipated Costs to Participating Customers

There are no direct costs incurred by customers in this program.

Ramp-up Strategy

The Home Energy Education Program is an existing, mature program being carried forward from Phase II, with changes. The Residential CSP will develop an implementation plan to facilitate the transition to Phase III.

Marketing Strategy

Due to the opt-out nature of the HER delivery, the program does not require any marketing. Once selected for participation by the Residential CSP, customers in the treatment group will receive a welcome letter informing them that they have been selected to receive the HERs.

Eligible Measures and Incentive Strategy

PPL Electric will not provide any specific incentives through this program; rather, by virtue of providing energy conservation education, information, and strategies, customers will make behavioral changes and gain energy savings. HERs recipients may also participate in other PPL Electric energy efficiency programs (receiving incentives from PPL Electric) as a result of receiving the HERs.

Deadline for Rebate Applications

PPL Electric offers all Home Energy Education Program services at no cost to customers; therefore, there are no rebate applications.

Program Start Date with Key Schedule Milestones

Table 34 lists the estimated key schedule milestones for the Home Energy Education Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 34. Home Energy Education Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Home Energy Education Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Through the Home Energy Education Program, PPL Electric provides selected customers with a periodic report about their energy usage and offers energy saving tips. No rebates are offered to the customers. As part of the evaluation, the EM&V CSP will likely verify savings using a randomized control trial, encompassing a treatment group (i.e., the group that receives HERs) and a control group (i.e., the group that does not receive HERs).

Administrative Requirements

The Residential CSP will provide overall administrative and operational management of the Home Energy Education Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric estimates approximately 123,000 customers will be in the treatment group (i.e., those receiving HERs) each year. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 35 displays anticipated program benefits and costs by program year and in total. Approximately 11% of the Residential sector budget is attributed to the Home Energy Education Program.

Table 35. Home Energy Education Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	40,144	41,080	41,600	47,168	57,946	227,938
Demand Reduction (MW)*	5.22	5.34	5.41	6.13	7.53	29.63
Total TRC Costs	\$1,845	\$1,759	\$1,952	\$2,253	\$2,398	\$10,208
Participant Costs	\$00	\$00	\$00	\$00	\$00	\$00
Direct Utility Costs	\$1,845	\$1,759	\$1,952	\$2,253	\$2,398	\$10,208
Customer Incentives	\$00	\$00	\$00	\$00	\$00	\$00
EDC Labor, Materials, Supplies	\$59	\$59	\$59	\$59	\$59	\$296
CSP Labor, Materials, Supplies	\$1,595	\$1,487	\$1,643	\$1,912	\$2,000	\$8,636
CSP Marketing	\$191	\$213	\$250	\$281	\$339	\$1,275

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Home Energy Education Program is projected to be cost-effective, with a TRC test ratio of 5.52. Table 36 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 36. Home Energy Education Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$48,338
NPV Costs	\$8,759
Net Benefits	\$39,579
Benefit/Cost Ratio	5.52

3.2.1 Low-Income Sector Programs

The following sections summarize each of PPL Electric’s proposed Low-Income sector programs. Please note that participation levels, savings, costs, and incentive ranges are estimates and may be subject to change.

Low-Income WRAP

Program Description

Through Low-Income WRAP, PPL Electric offers a broad selection of energy-saving improvements and education to low-income customers. The Company will offer services to income-qualified customers residing in single family, multifamily, and manufactured homes. For customers residing in single family homes or master-metered multifamily units, PPL Electric offers direct installation of a range of energy efficiency measures including HVAC, lighting, weatherization, and home health and safety. For customers residing in manufactured homes, the Company offers energy efficiency kits containing a range of self-installed, low-cost energy efficiency measures, such as LED bulbs. The program is offered at no cost to the participant.

The Low-income CSP will provide full weatherization services for up to 200 control group participants from the Company's Phase II Wise Home Efficiency Pilot Program (i.e., weatherization that was not provided in Phase II to this control group). Services may include, but are not limited to: direct install energy saving measures; weatherization, infiltration, and insulation measures inside the home; weatherization insulation measures outside the home; blower door testing; and combustion testing if needed (per Building Performance Institute technical requirements). The savings and costs for these participants are included in the Phase III estimates.

Objectives

The objectives of Low-Income WRAP are to:

- Provide low-income customers with an array of no-cost energy-saving equipment and education to help reduce their energy costs;
- Increase the health and safety of low-income customers' homes by installing no-cost measures such as smoke and carbon monoxide detectors, which may be coordinated with or implemented by the Low-Income Usage Reduction Program ("LIURP") WRAP;
- Achieve high customer and trade ally satisfaction through high-quality service and an impactful program offering;
- Promote other PPL Electric energy efficiency programs, specifically other low-income assistance programs; and
- Achieve a total approximate reduction in energy use of 50,000 MWh/year gross verified savings.

Target Market

Through Low-Income WRAP, PPL Electric targets low-income customers (renters and owners) living in single family homes, individually-metered multifamily buildings (residential rate class), tenant units in

master-metered multifamily buildings (nonresidential rate class),¹¹ and manufactured homes. To qualify as low-income, the customer’s household income must be at or below 150% of the FPIG; this includes enrollees in PPL Electric’s OnTrack Program.¹² Tenants must obtain landlord approval to participate in the program, with the likely exception of those who only receive LED bulbs.

Implementation Strategy

The Low-Income CSP will deliver the program to customers and will be primarily responsible for outreach, customer recruitment, audits, education, and equipment installation. The Low-Income CSP will also support sector-level program functions, including operating a customer call center, marketing, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 37 presents market risks associated with Low-Income WRAP, as well as strategies PPL Electric will use to manage each risk.

Table 37. Low-Income WRAP Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Homeowner and landlord lack of program awareness	Low program participation	<ul style="list-style-type: none"> • Low-Income CSP markets the program directly to income-eligible customers through agencies that support low-income customers, and through other partners/trade allies. • Low-Income CSP conducts neighborhood sweeps where there has not been a large number of customers participating in WRAP. • Low-Income CSP markets the program at town hall gatherings.
Difficulty getting landlord participation approval for low-income tenants	Low program participation among renters	<ul style="list-style-type: none"> • Low-Income CSP markets the program directly to landlords. • Low-Income CSP seeks joint ventures with equipment suppliers, trade allies, and other organizations to provide additional incentives/discounts to remove landlord barriers (such as financial incentives to eliminate code violations).
Possible saturation of eligible WRAP participants	Low program participation and savings	<ul style="list-style-type: none"> • PPL Electric requires that all OnTrack Program enrollees also participate in WRAP. • Low-Income CSP installs additional measures for customers who previously participated in WRAP.

¹¹ The Pa PUC’s 2016 TRC Test Order allows savings (prorated based on the percentage of consumption attributed to low-income occupants) from master-metered multifamily buildings to count toward the low-income savings compliance target. Costs for energy efficiency measures will be paid according to the rate class of the building because customers in that rate class are the ones receiving the benefits of the energy efficiency measures.

¹² Through its OnTrack Program, PPL Electric offers reduced monthly payments to low-income customers that fall behind on their utility bill payments.

Program Issue	Risk	Risk Management Strategies
		<ul style="list-style-type: none"> • Low-Income CSP reaches out to property landlords who refused to participate previously.

Anticipated Costs to Participating Customers

There are no direct costs incurred by customers in this program.

Ramp-up Strategy

The WRAP is an existing, mature program being carried forward from Phase II. The Low-Income CSP will develop marketing material and an implementation strategy to facilitate the transition to Phase III, including doubling the estimated number of participants compared to Phase II.

Marketing Strategy

PPL Electric’s staff will work with the Low-Income CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program in “Connect”;
- Providing online access to the program via the EE&C program website;
- Implementing direct outreach including neighborhood sweeps, community and town hall events, and door-to-door canvassing to create awareness about the program, which will include identifying low-income neighborhoods, multifamily buildings, and manufactured home parks that may benefit from Low-Income WRAP services and canvassing them with door hangers;
- Conducting targeted telemarketing and direct mailings to customers participating in PPL Electric’s OnTrack Program and Low-Income Home Energy Assistance Program (“LIHEAP”), and to other income-eligible customers; and
- Developing partnerships with housing and redevelopment authorities, community action groups, and other social service agencies.

Eligible Measures and Incentive Strategy

Table 38 identifies PPL Electric’s expected list of program measures. All services and measures are provided to income-qualified customers at no cost.

PPL Electric and the Low-Income CSP will work with stakeholders, trade allies, and various agencies (e.g., CBOs) to create partnerships that can leverage additional incentives or cost savings for low-income customers. Examples could include working with agencies, trade allies, equipment manufacturers, and others who provide incentives (or donated/discounted products and services) in addition to PPL Electric’s incentives to implement energy efficiency measures in low-income buildings or as part of a neighborhood makeover, especially if the joint venture can achieve more comprehensive savings. PPL Electric will prepare case studies to share the program benefits and encourage additional joint ventures.

Table 38. Low-Income WRAP Eligible Measures and Incentives

Measure	Eligibility Qualifications
Water reduction (low-flow showerheads and low-flow faucet aerators)	Electric hot water only Meets current TRM requirements
Water heater temperature setback	Electric hot water only Meets current TRM requirements
Water heater replacement (heat pump water heater where feasible)	Electric hot water only Meets current TRM requirements
Pipe insulation	Electric hot water only Meets current TRM requirements
Air sealing	Meets current TRM requirements
Duct sealing	Meets current TRM requirements
Insulation	Meets current TRM requirements Not applicable for individually metered multifamily units
HVAC system	Repair or replacement Meets current TRM requirements
LED lighting	Meets current TRM requirements
Furnace whistle	Meets current TRM requirements
Smart strips	Meets current TRM requirements
Education	N/A
Smoke and carbon monoxide detectors	Must be recommended by auditor
Other measures needed in the home	As recommended by auditor

All measures may not be available at all times. PPL Electric will review the program continually and may adjust available measures, incentive levels, or eligibility qualifications to achieve program savings and cost budgets. PPL Electric will coordinate Low-Income WRAP with its LIURP WRAP to maximize the effectiveness of measures and services provided to participants. In some cases, some of the measures provided in a home will be covered by Low-Income and other measures will be covered by LIURP.

For master-metered multifamily buildings (in a nonresidential rate class) with low-income occupants, PPL Electric will provide LED bulbs in the living units at no cost. If master-metered multifamily buildings desire energy efficiency improvements for common areas (e.g., vestibule, basement, hallways, exterior) or additional measures (e.g., appliance recycling, appliances, HVAC, water heaters) in the living units, PPL Electric will implement those measures pursuant to the applicable nonresidential programs and apply those programs' eligibility requirements and incentive levels. Consistent with the Pa PUC's 2016 TRC Test Order, the portion of savings attributable to low-income occupants in master-metered multifamily buildings will apply toward the low-income savings compliance target.

PPL Electric will work with the SWE and other Pennsylvania EDCs to determine how these savings will be reported. As requested by most stakeholders, PPL Electric recommends showing the total savings for each project under the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to

GNE if the customer qualifies. The portion of savings attributable to low-income occupants will be noted as applying toward the low-income compliance target and will be reported separately from other low-income savings (i.e., income-qualified customers in the residential rate class).

Similarly, the costs for measures installed in master-metered multifamily buildings will be assigned to the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies.¹³ PPL Electric does not expect the savings or costs associated with implementing LED bulbs in the tenant units of master-metered multifamily buildings to be significant (approximately less than 5,000 MWh/year in savings and less than \$1 million in costs).

Deadline for Rebate Applications

PPL Electric offers Low-Income WRAP services at no cost to customers; therefore, there is no rebate application.

Program Start Date with Key Schedule Milestones

Table 39 lists the estimated key schedule milestones for Low-Income WRAP. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 39. Low-Income WRAP Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. The EM&V CSP will follow all applicable methods in the TRM to calculate energy savings and demand reduction. For example, Section 3.3.3.3.1 of the Phase II Evaluation Framework states that if TRM fully or partially deemed measures are installed in low-income weatherization programs, the EDC may choose to use the deemed savings value for the measure. The EM&V CSP will use a billing regression analysis (i.e., IPMVP Option C) in cases where the measures offered include weatherization or

¹³ GNE costs will be ultimately assigned to the rate class of the customer as described in the Cost Recovery Mechanism section of this EE&C Plan.

other weather-dependent improvements. PPL Electric anticipates conducting annual impact evaluations and conducting process evaluations at least once during Phase III.

Through the Low-Income WRAP, PPL Electric will offer a variety of measures and may treat the whole home. Where the whole home is treated, the EM&V CSP will conduct an IPMVP Option C regression analysis using the customer's historical consumption data. Installation rates are not determined for individual measures since the regression analysis is used.

In cases where only equipment with TRM-based savings are installed, the EM&V CSP will review a sample of participant records to verify the quantity, efficiency level, and qualification based on measure type and job type.

If a home receives measures from Low-Income WRAP and LIURP WRAP, the Evaluation Plan will describe how the savings will be allocated to Low-Income WRAP and LIURP WRAP.

Administrative Requirements

The Low-Income CSP will provide overall administrative and operational management of Low-Income WRAP. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates delivering services to 7,000 Low-Income WRAP participants per year, achieving a total of approximately 35,000 participants during Phase III. This is approximately double the number of annual participants compared to Phase II. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 40 displays anticipated program benefits and costs by program year and in total. Approximately 85% of the Low-Income sector budget is attributed to Low-Income WRAP.

Table 40. Low-Income WRAP Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	10,501	10,564	10,578	10,635	8,268	50,546
Demand Reduction (MW)*	1.45	1.46	1.46	1.47	1.04	6.88
Total TRC Costs	\$7,225	\$6,947	\$9,796	\$9,966	\$6,372	\$40,306
Participant Costs	\$00	\$00	\$00	\$00	\$00	\$00
Direct Utility Costs	\$7,225	\$6,947	\$9,796	\$9,966	\$6,372	\$40,306
Customer Incentives	\$00	\$00	\$00	\$00	\$00	\$00
EDC Labor, Materials, Supplies	\$764	\$314	\$314	\$314	\$314	\$2,018
CSP Labor, Materials, Supplies	\$6,149	\$6,322	\$9,171	\$9,340	\$5,747	\$36,729
CSP Marketing	\$312	\$312	\$312	\$312	\$312	\$1,560

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

WRAP is projected to not be cost-effective, with a TRC test ratio of 0.66. Table 41 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 41. WRAP Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$23,038
NPV Costs	\$34,878
Net Benefits	(\$11,839)
Benefit/Cost Ratio	0.66

Plans for Achieving Compliance with the Implementation Order

PPL Electric designed its Plan to achieve its low-income targets with Phase III transactions (i.e., projects that are implemented during Phase III) through income-qualified programs only (i.e., Low-Income WRAP and the Energy Efficiency Kits and Education Program). PPL Electric is not projecting significant low-income carryover savings from Phase II.

Energy Efficiency Kits and Education Program

Program Description

Through the Energy Efficiency Kits and Education Program, PPL Electric delivers energy efficiency kits and education to low-income customers through two delivery mechanisms: (1) direct mail, and (2) workshops held at CBOs.

- **Direct Mail Kits.** The Low-Income CSP conducts targeted mail outreach to invite qualified customers to participate in the Energy Efficiency Kits and Education Program. In order to receive a kit in the mail, recipients must return the business reply card attached to the mailing. To generate the list of targeted outreach recipients, PPL Electric identifies customers that: have received LIHEAP benefits; are enrolled in the Company's OnTrack Program; or are low-income qualified and have been identified by the Low-Income CSP via market research, data mining, or other means.
- **Energy Education Workshops.** Through their day-to-day interactions with clients, CBOs will assist the Low-Income CSP in recruiting qualified customers to participate in a one-hour energy-education workshop or a one-on-one session with CBO staff. To maximize attendance, the CBOs will offer the workshops at various times including days, evenings, and weekends. During the workshops and one-to-one sessions, CBO staff will introduce customers to the energy-saving measures and educational materials in the kits. To help CBO staff understand key elements of the workshops, the Low-Income CSP will conduct train-the-trainer sessions for CBO staff. These in-person sessions will provide CBO staff with the tools needed to introduce energy education and low-cost/no-cost energy efficiency measures to their low-income clients.

Objectives

The objectives of the Energy Efficiency Kits and Education Program are to:

- Provide low-income customers with a no-cost energy efficiency kit and education to help them conserve energy and reduce their energy costs;
- Maintain partnerships with local CBOs so customers receive maximum and timely customer assistance;
- Achieve high customer and trade ally satisfaction through quality service and an impactful program offering;
- Promote other PPL Electric energy efficiency programs, specifically other low-income assistance programs; and
- Achieve a total approximate reduction in energy use of 38,000 MWh/year gross verified savings.

Target Market

PPL Electric targets the program to customers at or below 150% of the FPIG.

Implementation Strategy

The Low-Income CSP is responsible for program operations and delivery, including marketing, CBO recruitment, kit production and distribution, inventory management, and CBO staff training.

Additionally, the Low-Income CSP will support sector-level program functions, including operating a customer call center, managing marketing, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Program Issues, Risks, and Risk Management Strategy

Table 42 presents market risks associated with the Energy Efficiency Kits and Education Program, as well as strategies PPL Electric will use to manage each risk.

Table 42. Energy Efficiency Kits and Education Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customers do not install the energy efficiency measures in the kit	Although the program education component would be completed, measurable energy savings would not be achieved	<ul style="list-style-type: none"> • Low-Income CSP provides instructions on how to install kit measures. • CBOs instruct customers how to install the measures during educational workshops.
Lack of customer program awareness	Low program participation	<ul style="list-style-type: none"> • Low-Income CSP and CBOs market the program directly to income-eligible customers. • Low-Income CSP markets the program during town hall gatherings for multifamily buildings and manufactured home parks. • Low-Income CSP conducts neighborhood sweeps in areas where participation is low.

Anticipated Costs to Participating Customers

There are no direct costs incurred by customers in this program.

Ramp-up Strategy

The Energy Efficiency Kits and Education Program is an existing, mature program being carried forward from Phase II. The Low-Income CSP will develop marketing material to increase participation and awareness, and will facilitate the transition to Phase III.

Marketing Strategy

PPL Electric’s staff will work with the Low-Income CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program in “Connect”;
- Providing online access to the program via the EE&C program website;
- Conducting community outreach at events;
- Conducting targeted telemarketing and direct mailings to customers participating in PPL Electric’s OnTrack Program, LIHEAP, and other energy efficiency and weatherization programs; and
- Networking with community action groups and other social service agencies.

Additionally, participating CBOs may develop and sponsor their own marketing materials to increase awareness within their community.

Eligible Measures and Incentive Strategy

Through the Energy Efficiency Kits and Education Program, PPL Electric offers energy efficiency kits and education to customers, as well as train-the-trainer opportunities for CBO staff. Table 43 identifies PPL Electric’s proposed list of program measures and minimum eligibility qualifications. The Company will offer all program measures and services at no cost to customers.

Table 43. Energy Efficiency Kits and Education Program Eligible Measures and Incentives

Measure	Eligibility Qualifications
Kitchen faucet aerator	1.5 gpm Meets current TRM requirements
LED night light	Meets current TRM requirements
Showerhead	1.5 gpm Meets current TRM requirements
Furnace whistle	Meets current TRM requirements
LED bulbs	ENERGY STAR Meets current TRM requirements
Smart strip	Tier 2 Meets current TRM requirements
Education	N/A

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets.

Deadline for Rebate Applications

PPL Electric offers all the Energy Efficiency Kits and Education Program services at no cost to customers; therefore, there is no rebate application.

Program Start Date with Key Schedule Milestones

The Energy Efficiency Kits and Education Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 44 lists the estimated key schedule milestones for the Energy Efficiency Kits and Education Program. PPL Electric program staff will lead implementation and provide management oversight of all tasks.

Table 44. Energy Efficiency Kits and Education Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework.

Program participants receive free kits that include energy efficiency products and a paper survey where they document their energy efficiency actions. As part of the evaluation, the EM&V CSP will analyze data collected from all returned paper surveys. The EM&V CSP will review a sample of participant records to verify the quantity, efficiency level, and qualification based on measure type. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Energy Efficiency Kits and Education Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

Administrative Requirements

The Low-Income CSP will provide overall administrative and operational management of the Energy Efficiency Kits and Education Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates delivering approximately 8,000 energy efficiency kits to targeted customers each year, and a total of 40,000 energy efficiency kits during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 45 displays anticipated program benefits and costs by program year and in total. Approximately 15% of the Low-Income sector budget is attributed to the Energy Efficiency Kits and Education Program.

Table 45. Energy Efficiency Kits and Education Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	7,074	7,696	8,007	8,318	6,506	37,601
Demand Reduction (MW)*	0.99	1.08	1.12	1.16	0.83	5.18
Total TRC Costs	\$1,262	\$1,408	\$1,500	\$1,596	\$1,133	\$6,899
Participant Costs	\$00	\$00	\$00	\$00	\$00	\$00
Direct Utility Costs	\$1,262	\$1,408	\$1,500	\$1,596	\$1,133	\$6,899
Customer Incentives	\$00	\$00	\$00	\$00	\$00	\$00
EDC Labor, Materials, Supplies	\$45	\$45	\$45	\$45	\$45	\$225
CSP Labor, Materials, Supplies	\$1,096	\$1,223	\$1,303	\$1,387	\$903	\$5,912
CSP Marketing	\$121	\$140	\$152	\$164	\$185	\$762

* Demand reductions from energy efficiency programs do not count toward PPL Electric's demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Energy Efficiency Kits and Education Program is projected to be cost-effective, with a TRC test ratio of 2.10. Table 46 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 46. Energy Efficiency Kits and Education Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$12,569
NPV Costs	\$5,989
Net Benefits	\$6,580
Benefit/Cost Ratio	2.10

Plans for Achieving Compliance with the Implementation Order

PPL Electric designed its Plan to achieve its low-income targets with Phase III transactions (i.e., projects that are implemented during Phase III) through income-qualified programs only (i.e., Low-Income WRAP and the Energy Efficiency Kits and Education Program). PPL Electric is not projecting significant low-income carryover savings from Phase II.

3.3 Small Commercial & Industrial Sector Programs

The following sections summarize each of PPL Electric's proposed Small C&I sector programs. Participation levels, savings, costs, and incentive ranges are estimates and may be subject to change.

The Plan presents the Efficient Equipment, Custom, and Demand Response Programs as separate programs with separate cost and savings estimates for each Nonresidential customer sector (i.e., Small C&I, Large C&I, and GNE), as required by the Commission's EE&C Plan Template. However, as was shown in Figure 3 in Section 3.1.2, PPL Electric will offer each of these programs to all Nonresidential customer sectors as unified nonresidential offerings.

For master-metered multifamily buildings in a nonresidential rate class that have low-income occupants, PPL Electric will provide LED bulbs in the living units at no cost. If the owners/managers of master-metered multifamily buildings desire energy efficiency improvements for common areas (e.g., vestibule, basement, hallways, exterior) or additional measures (e.g., appliance recycling, appliances, HVAC, water heaters) in the living units, those measures will be implemented pursuant to the applicable nonresidential programs and subject to those program's eligibility requirements and incentive levels.

Consistent with the Pa PUC's 2016 TRC Test Order, PPL Electric will apply the portion of savings attributable to low-income occupants in master-metered multifamily buildings toward the low-income savings compliance target. PPL Electric will work with the SWE and other Pennsylvania EDCs to determine how these savings will be shown in formal reports. As requested by most stakeholders, PPL Electric recommends showing the total savings for each project under the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies. PPL Electric will apply the portion of savings attributable to low-income occupants toward the low-income compliance target and will report these savings separately from other low-income savings (i.e., income-qualified customers in the residential rate class).

PPL Electric will assign the costs for measures installed in master-metered multifamily buildings to the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies.¹⁴ PPL Electric does not expect the savings or costs associated with installing LED bulbs in tenant units of master-metered multifamily buildings to be significant (approximately less than 5,000 MWh/year in savings and less than \$1 million in costs).

¹⁴ GNE costs will be ultimately assigned to the appropriate customer rate class as described in the Cost Recovery Mechanism section of this EE&C Plan.

Efficient Equipment Program – Small C&I

Program Description

Through the Small C&I Efficient Equipment Program, PPL Electric promotes the purchase and installation of a wide range of high-efficiency equipment, including lighting, HVAC, and other measures. The Company provides customers with financial incentives based on the measure installed and savings provided, which offset the higher purchase costs of energy efficient equipment. Additionally, the Company offers program information on the features and benefits of energy efficient equipment.

PPL Electric will begin utilizing a midstream lighting delivery channel in Phase III, most likely in late PY8 or thereafter. PPL Electric designed the midstream lighting component to make choosing and procuring high-efficiency lighting more straightforward and faster than via typical downstream methods. In the midstream lighting approach, trade allies and customers may purchase LED lamps and bulbs directly from a participating and qualified midstream lighting distributor and receive an immediate rebate at the point of purchase. This approach has proven to: increase customer and trade ally satisfaction; reduce administrative expenses; increase the volume of installed, high-efficiency lighting and socket upgrades, particularly for customers implementing routine lighting projects; and reduce the number of contractors and customers who use high-efficiency lighting products but fail to submit program applications.

The Nonresidential CSP will provide all nonresidential customers with synergies and a streamlined “one stop” experience. The Nonresidential CSP will manage and coordinate the Small C&I Efficient Equipment Program, maintaining a call and rebate processing center, recruiting and educating trade allies, and marketing the program to facilitate achieving the desired program participation and to encourage customers to take a whole-building approach or implement multiple measures.

Objectives

The objectives of the Small C&I Efficient Equipment Program are to:

- Provide energy-saving opportunities to qualified customers;
- Increase the market penetration of high-efficiency technologies and building systems for customers by incentivizing high-efficiency and ENERGY STAR-rated appliances, lighting equipment, and HVAC systems;
- Engage trade allies to stock, promote, and provide high-efficiency technology options to customers;
- Promote other PPL Electric energy efficiency programs;
- Collect energy and operating data from customers, as required to confirm customer and measure eligibility, and to determine energy savings and cost-effectiveness;
- Obtain participation necessary to achieve approximately 250,000 MWh/year gross verified savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Efficient Equipment Program will be available to customers in a nonresidential rate class and any building or business type. Customers who occupy a rental property must have the owner’s approval to participate. For the midstream lighting component, PPL Electric will target and leverage the midstream channel to deploy specific LED technologies and other potential equipment.

Implementation Strategy

The Nonresidential CSP will deliver the Small C&I Efficient Equipment Program, promoting the various energy efficiency options available to this customer segment through a range of marketing and outreach tactics. The program relies on projects being initiated by customers, as well as on trade allies—including midstream equipment distributors—and the Nonresidential CSP. The Nonresidential CSP will leverage trade ally and manufacturer relationships to co-market energy efficient equipment and the value of program participation. The Nonresidential CSP will develop, update, and process rebate applications and payments. The EM&V CSP will provide evaluation services. PPL Electric staff will manage the Nonresidential CSP.

Key steps in this program include:

- Educating customers on energy efficiency opportunities and directing them to the program through marketing activities, the website, and/or direct contact with equipment distributors or equipment installation contractors/trade allies;
- Having customers complete program applications, or working with customers, equipment/appliance retailers, mid-stream distributors, and installation contractors to complete program applications;
- Ensuring customers submit the required documentation for processing;
- Reviewing pending and completed project documentation to verify the applicant is a PPL Electric customer and the completed project and installed equipment meets program eligibility criteria;
- When possible, working with customers to confirm project preapproval before ordering energy efficiency equipment;
- Recruiting and developing an effective trade ally network;
- Processing applications for completed projects and issuing rebates for qualified projects/equipment; and
- Verifying completed equipment/appliance installation for a sample of participants to confirm program integrity as part of measurement and verification (“M&V”).

Program Issues, Risks, and Risk Management Strategy

Table 47 presents market risks associated with the Small C&I Efficient Equipment Program, as well as strategies PPL Electric will use to manage each risk.

Table 47. Small C&I Efficient Equipment Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner	• Decision-makers choose to install	• PPL Electric offers incentives and

Program Issue	Risk	Risk Management Strategies
does not prioritize energy efficiency	<p>cheaper, less efficient equipment with shorter payback/internal rate of return (“IRR”), resulting in lower savings</p> <ul style="list-style-type: none"> • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<p>programs to reduce payback and IRR for business owners.</p> <ul style="list-style-type: none"> • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails, and encourages businesses to plan for equipment replacement. • PPL Electric provides incentives for trade allies to stock, promote, and install efficient measures.
Customers are unaware of the benefits of installing and properly maintaining energy efficient equipment	Customers do not properly maintain equipment and savings benefits erode over time	Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by customers participating in the Small C&I Efficient Equipment Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The Small C&I Efficient Equipment is an existing, mature program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP has developed a transitional incentive strategy aiming to bridge incentives for customers whose participation in the program spans Phase II and Phase III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III:

- Projects on the Phase II waitlist will receive comparable incentives if completed and installed in early Phase III. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.
- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., placed in-service) in Phase III will be eligible for the approved Phase II rebate and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric’s staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Leveraging trade ally and manufacturer relationships to co-market energy efficient equipment.
- Hosting webinars;
- Participating in trade shows and other outreach;
- Publishing marketing materials including charts, brochures, and case studies;
- Providing newsletters and coordinating with key market partners including trade associations and agencies;
- Advertising in local newspapers and other mass media;
- Using limited time offers, special promotions, and no-cost measures to promote energy efficiency;
- Offering trade ally incentives and rewards;
- Cross-promoting through other PPL Electric energy efficiency programs;
- Providing information and training on specific technologies directed towards niche markets;
- Incorporating customers in area- or territory-focused promotions; and
- Working with distributors to promote and incent lighting purchases to capture program opportunities missed by other outreach methods.

Eligible Measures and Incentive Strategy

PPL Electric will offer rebates and incentives to qualified customers (or trade allies, depending on the delivery channel) who submit completed applications and documentation of the efficiency measures installed. Customers will have the option to assign rebate payments to a third party.

For all measures offered through the Small C&I Efficient Equipment Program, PPL Electric will provide incentives in the range of \$0.03 to \$0.17 per annual kWh saved. Incentives may be capped at 50% to 100% of the total project costs (excluding internal labor).

PPL Electric may distribute lighting measures to customers through the traditional rebate, direct discount (i.e., incentive paid to a trade ally), or midstream mechanism. Table 48 identifies PPL Electric’s proposed list of program measures and minimum eligibility qualifications.

Table 48. Small C&I Efficient Equipment Program Eligible Measures and Incentives

Measure	Eligibility Qualifications
HVAC	
ASHP (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
ASHP (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Air-Cooled DX (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009

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Measure	Eligibility Qualifications
Air-Cooled DX (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water ,or evaporative-cooled) exceeding IECC 2009
Electric Chiller	Exceed IECC 2009 energy efficiency requirements
Water Source or Geothermal Heat Pump	Exceed IECC 2009 energy efficiency requirements
ECM Circulating Fan	Baseline: shaded-pole (“SP”) or permanent-split capacitor (“PSC”) evaporator fan motors in an air handling unit
Ductless Heat Pump	SEER ≥ 16
Other HVAC Measure Listed in the TRM	Meets current TRM requirements
VFD	
Variable Frequency Drive (“VFD”)	Baseline: motor fan or pump without a VFD control
Food Service and Hospitality	
Variable Speed Drive (“VSD”) Kitchen Exhaust Fan	Retrofit kitchen ventilation system with VSD, demand controls, and sensors
Low-Flow Pre-Rinse Sprayer (Food Service and Grocery)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 2.25 gpm food service; 2.15 gpm grocery applications
Low-Flow Pre-Rinse Sprayer (Time of Sale/Retail)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 1.52 gpm
Steam Cooker	ENERGY STAR
Ice Maker	ENERGY STAR or CEE tier 2
Beverage/Snack Machine Control	Added to non-ENERGY STAR machines
Guest Room Occupancy Sensor	Replace guest rooms occupancy sensors with manual heating/cooling set-point and fan on/off/auto thermostat controls
Lighting	
LED Exit Sign	Replace incandescent or fluorescent exit sign
Occupancy Sensor	Wall, ceiling, or fixture mounted
T5	New T5 lamps and ballasts
T8 High Performance Fixture	Retrofit fixture with qualified high performance T8 lamps and ballast (cee1.org list)
High Performance T8 Lamp	Retrofit standard T8 with qualified high performance T8 (cee1.org list)
T8 Reduced Wattage Fixture	Retrofit fixture with qualified reduced wattage T8 lamps and ballast (cee1.org list)
Reduced Wattage T8 Lamp	Retrofit standard T8 with qualified reduced wattage T8 (cee1.org list)
High Bay T5, T8, LED	New T5, T8, LED fixture
De-Lamp and Install Reflectors	Replace existing T5, T8 fixture with one or more lamps removed, must include electronic ballast and reflector
LED Lamp	Replace existing incandescent lamp or compact fluorescent lamp (“CFL”) lamp with ENERGY STAR or Lighting Facts LED
Metal Halide Pulse Start Lamps	Replace probe start (≤ 320watts, > 320 watts)
LED Street Light/Area Light	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
LED Interior Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Induction Lighting	New fixtures or retrofit kits
Interior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007 and Building Area Method or Space-by-Space Method
Exterior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007; Baseline Exterior Lighting Power Densities

Measure	Eligibility Qualifications
LED Wall Pack	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Reach-in Refrigeration Case Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Other Lighting and Controls Listed in the TRM	Listed in the TRM or PA Lighting Form Provides energy savings
Compressed Air	
VSD Air Compressor	Single VSD unit less than 75 horsepower ("hp")
Cycling Refrigerated Thermal Mass Dryer	Baseline: non-cycling (e.g., continuous) air dryer with a capacity of 600 cfm or below. The replacement of desiccant, deliquescent, heat-of-compression, membrane, or other types of dryers does not qualify under this measure
Air-Entraining Air Nozzle	Replace non-air entraining air nozzle (open copper tube of 1/8-inch or 1/4-inch orifice diameter) with an energy efficient air-entraining air nozzle that uses less than 15 cfm at 100 psi for industrial applications.
No-Loss Condensate Drain	Retrofit existing timed drained system with new no-loss condensate drains
Air Tank for Load/No Load Compressor	Minimum storage ratio of 4 gallons per cubic feet per minute ("CFM")
Refrigeration	
High-Efficiency Refrigeration/Freezer Case	Must exceed federal efficiency standards
High-Efficiency Evaporator Fan Motor for Reach-In or Walk-in Refrigerated Case	Replace existing SP evaporator fan motors or PSC motors in reach-in or walk-in refrigerated display cases with an electronically commutated motor ("ECM")
Evaporator Fan Controller	Install in medium-temperature walk-in coolers and low-temperature walk-in freezers
Floating Head Pressure Control ("FHPC")	Baseline: refrigeration system without FHPC
Anti-Sweat Heater Control	Retrofit existing glass doors with uncontrolled heaters
Evaporator Coil Defrost Control	Retrofit existing walk-in coolers or freezers without defrost controls
VSD Refrigeration Compressor	Retrofit existing commercial refrigeration systems without VSD controls
Strip Curtains for Walk-In Coolers and Freezers	Install or retrofit strip curtains in commercial walk-in cooler and freezer doors
Night Cover for Display Case	Install on existing open-type refrigerated display cases, where covers are deployed during the facility's unoccupied hours
Auto Closer	Retrofit doors not equipped with auto-closers, and assume the doors have strip curtain for walk-in coolers and freezers
Door Gaskets for Walk-in and Reach-in Coolers and Freezers	Replace worn-out gaskets with new better-fitting gaskets
Doors with Low or No Anti-Sweat Heat for Low Temperature Cases	Install a no-heat/low-heat clear glass door on an upright display case
Suction Pipe Insulation for Walk-In Coolers and Freezers	Insulate bare refrigeration suction pipes for walk-in coolers and freezers
Refrigerated Display Case Doors	Retrofit existing vertical open display cases with zero heat doors
Office Equipment	
ENERGY STAR Server	Replace existing servers in a data center or server closet with new ENERGY STAR servers of similar computing capacity
Personal Computer ("PC") Power Management	Any software that meets Pacific Northwest Regional Technical Forum's ("RTF") Networked Computer Power Management Control Software Specifications
Smart Strip Plug Outlet	Replace existing standard strip plug outlet with smart strip plug

Measure	Eligibility Qualifications
Agricultural	
Programmable Thermostat	Units controlling central air conditioner, electric heat, or resistance
VSD Controller for Dairy Vacuum Pumps	UL listed, meets Institute of Electrical and Electronics Engineers (“IEEE”) standards
Circulating Fans	Must be tested by Air Movement & Control Association (“AMCA”)
High Volume, Low Speed Fans	Must be tested by AMCA; >16 feet in diameter
Dairy Scroll Compressor Controller	VSD controllers for dairy vacuum pumps, UL listed and meeting IEEE harmonic control standards
Low-Pressure Irrigation System	Replace systems operating on 50% or less than existing system pressure
Livestock Waterer	Thermostatically-controlled with 2-inches or more of factory-installed insulation
Heat Reclaimer	Meets current TRM requirements
Automatic Milker Take-Offs	Automatic milker take-offs that determine milking end time
Non-Electric High-Efficiency Central Heat (gas, oil, propane)	Meets current TRM requirements Maximum of 250 units across all customer sectors/programs

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the installation of multiple measures or a more comprehensive whole facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee the program funding.

Program Start Date with Key Schedule Milestones

The Small C&I Efficient Equipment Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 49 lists the estimated key schedule milestones for the Small C&I Efficient Equipment Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 49. Small C&I Efficient Equipment Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Small C&I Efficient Equipment Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an evaluation plan and sampling protocol that fits the program prescriptive rebates and midstream incentive delivery channel. As part of this process, the EM&V CSP will review a sample of participant and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment may be included as a verification activity.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the Small C&I Efficient Equipment Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates 12,700 small C&I customers will participate in the Small C&I Efficient Equipment Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 50 displays anticipated program benefits and costs by program year and in total. Approximately 26% of the Nonresidential sector budget is attributed to the Small C&I Efficient Equipment Program.

Table 50. Small C&I Efficient Equipment Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	43,023	43,587	54,714	54,700	53,696	249,720
Demand Reduction (MW)*	8.80	8.92	11.19	11.18	10.98	51.07
Total TRC Costs	\$14,905	\$15,202	\$19,635	\$19,630	\$18,855	\$88,227
Participant Costs	\$8,390	\$9,377	\$12,144	\$12,196	\$13,105	\$55,212
Direct Utility Costs	\$6,515	\$5,825	\$7,490	\$7,434	\$5,750	\$33,015
Customer Incentives	\$5,114	\$4,411	\$5,025	\$4,969	\$4,107	\$23,626
EDC Labor, Materials, Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, Supplies	\$1,169	\$1,181	\$2,233	\$2,233	\$1,410	\$8,226
CSP Marketing	\$158	\$158	\$158	\$158	\$158	\$788

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Small C&I Efficient Equipment Program is projected to be cost-effective, with a TRC test ratio of 1.88. Table 51 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 75%.

Table 51. Small C&I Efficient Equipment Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$142,174
NPV Costs	\$75,774
Net Benefits	\$66,401
Benefit/Cost Ratio	1.88

Custom Program – Small C&I

Program Description

Through the Small C&I Custom Program, PPL Electric provides financial incentives to customers who install measures that are not offered in PPL Electric’s other programs, including measures that are not addressed in the TRM. These measures may include new or replacement energy efficient equipment, retro-commissioning, repairs, equipment optimization, new construction projects, operational and process improvements, CHP projects, and behavioral changes that result in cost-effective energy efficiency savings. To qualify for financial incentives, eligible customers are required to provide documentation that their proposed efficiency upgrades pass the program cost-effectiveness threshold and technical criteria. The program also includes a continuous energy improvement component, under which the Nonresidential CSP works closely with customers to identify ways to reduce their electricity usage through improved operations and maintenance and behavioral changes.

The Nonresidential CSP will support all sector-level program functions, including operating a customer call center, marketing, developing and maintaining an effective trade ally network, processing customer incentives, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Objectives

The objectives of the Small C&I Custom Program are to:

- Encourage PPL Electric Small C&I sector customers to take a comprehensive, whole-facility approach to energy efficiency by installing high-efficiency custom measures or processes;
- Encourage qualifying equipment repairs, optimization, and operational or process changes that reduce electricity consumption;
- Increase customer awareness of the features and benefits of energy efficient equipment.
- Increase the market penetration of high-efficiency equipment;
- Support emerging technologies and non-typical efficiency solutions in cost-effective applications;
- Encourage advanced energy efficiency strategies required for certification by national market transformation programs such as Leadership in Energy and Environmental Design (“LEED”), Architecture 2030, or ENERGY STAR Buildings;
- Obtain participation necessary to achieve approximately 183,000 MW/year gross verified savings; and
- Achieve high customer and trade ally satisfaction.

Target Market

The Custom Program will be available to customers in a nonresidential rate class and any building or business type. Customers occupying rental property must have the owner’s approval to participate.

Implementation Strategy

PPL Electric relies on the Nonresidential and EM&V CSPs and trade allies for program implementation. The Nonresidential CSP will handle customer intake, routing, and application processing. The Nonresidential CSP will work directly with trade allies and customers to help identify, develop, and implement custom projects. The Nonresidential CSP will develop project scopes, analyze costs, and determine potential energy savings of proposed projects, conduct field verification of completed projects and help determine the reported energy savings from installed projects. The EM&V CSP will conduct independent evaluations to determine verified savings.

Program Issues, Risks, and Risk Management Strategy

Table 52 presents market risks associated with the Small C&I Custom Program, as well as strategies PPL Electric will use to manage each risk.

Table 52. Small C&I Custom Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner does not prioritize energy efficiency	<ul style="list-style-type: none"> • Decision-makers choose to install cheaper, less efficient equipment with a shorter payback/IRR, resulting in lower savings • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<ul style="list-style-type: none"> • PPL Electric offers incentives and programs to reduce payback and IRR for business owners. • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails, and encourages businesses to plan for equipment replacement. • PPL Electric provides incentives for trade allies who stock, promote, and install efficient measures.
Customers are unaware of the benefits of installing and properly maintaining energy efficient equipment	Customers do not properly maintain equipment so savings and benefits erode over time	Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by customers participating in the Small C&I Custom Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The Small C&I Custom Program is an existing program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP developed a transitional incentive strategy aiming to bridge incentives for customers whose participation in the program spans Phase II and Phase III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III:

- Projects on the Phase II waitlist that are completed and installed in early Phase III will receive comparable incentives. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.
- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., placed in service) in Phase III will be eligible for the approved Phase II rebate, and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric's staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Communicating and providing access to program information on the EE&C program website.
- Promoting the program in newsletters;
- Advertising using newspaper, radio, direct mail, bill inserts, cross-program advertisements, commercial ads, and other mass media;
- Coordinating advertising opportunities with trade allies;
- Developing, publishing, and distributing program brochure and case studies;
- Conducting one-on-one marketing to Small C&I customers through trade allies, business accounts specialists, and Nonresidential CSP outreach;
- Targeting marketing to facility managers, building or process engineers, building owners and managers associations, HVAC contractors, energy services firms, architects and engineers, real estate developers, economic development organizations, customer advocacy groups, trade associations, and other trade allies to encourage the installation of new energy efficient technologies and adoption of best operating practices;
- Providing specific outreach to individual tenants as well as building owners and property managers in leased commercial buildings to encourage participation in the program;
- Targeting specific sectors identified as having a high level of unrealized energy efficiency potential; and
- Providing limited time offers.

Eligible Measures and Incentive Strategy

PPL Electric provides incentives following successful implementation of a cost-effective project. The Company offers performance incentives based on the avoided or reduced kWh/year resulting from the project. Incentives may be capped at 50% to 100% of the total project costs (excluding internal labor) and are subject to an annual cap for each project and for each participating customer. The per-customer-site cap is defined as one building with one or more meters. Multiple sites and a parent company cap will apply to a campus setting or multiple buildings (on the same property or in different locations) with a common owner.

Program measures, eligibility requirements, and incentives may change to reflect progress, changes in the TRM, changes in market conditions, or other factors. Table 53 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges.

Table 53. Small C&I Custom Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range
Custom Nonresidential	Projects must meet a TRC test greater than 1.1. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% - 100% of the total project cost (excluding internal labor)	\$0.05 - \$0.14 per annual kWh saved
CHP	Projects must meet a TRC test greater than 1.25. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% of the total project cost (excluding internal labor).	\$0.02 - \$0.10 per annual kWh saved

PPL Electric has budgeted approximately \$3 million for pilots and new technology in the Custom Program (for all customer sectors). As new technology and pilots are identified, PPL Electric will provide details and budgets to stakeholders and Pa PUC staff prior to implementation.

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings within budget. PPL Electric may offer tiered incentives that encourage the installation of multiple measures or a more comprehensive whole facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee program funding. For the Small C&I Custom Program, PPL Electric may require preapproval to allow time

for the Company (or the Nonresidential CSP) to qualify the project, minimize free-ridership, screen for cost-effectiveness, determine the site-specific M&V plan, and conduct pre-metering if required.

Program Start Date with Key Schedule Milestones

The Small C&I Custom Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 54 lists the estimated key schedule milestones for the Small C&I Custom Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 54. Small C&I Custom Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Small C&I Custom Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an evaluation plan and sampling protocol that fits each program component for the Small C&I Custom Program (i.e., custom incentives, small business direct install, and behavioral changes). The EM&V CSP will also develop site-specific EM&V plans to meet Act 129 evaluation requirements.

As part of the EM&V activities, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment will be included as a verification activity for the Small C&I Custom Program.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the Small C&I Custom Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 160 Small C&I customers will participate in the Small C&I Custom Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 55 displays anticipated program benefits and costs by program year and in total. Approximately 19% of the Nonresidential sector budget is attributed to the Small C&I Custom Program.

Table 55. Small C&I Custom Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	29,011	29,562	40,665	41,925	41,925	183,089
Demand Reduction (MW)*	4.91	5.01	6.89	7.10	7.10	31.00
Total TRC Costs	\$9,967	\$9,985	\$13,272	\$13,334	\$12,934	\$59,492
Participant Costs	\$5,435	\$5,942	\$8,030	\$8,008	\$8,424	\$35,839
Direct Utility Costs	\$4,532	\$4,043	\$5,242	\$5,326	\$4,510	\$23,653
Customer Incentives	\$3,493	\$2,992	\$3,540	\$3,595	\$3,179	\$16,799
EDC Labor, Materials, Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, Supplies	\$826	\$839	\$1,490	\$1,519	\$1,119	\$5,793
CSP Marketing	\$137	\$137	\$137	\$137	\$137	\$687

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Small C&I Custom Program is projected to be cost-effective, with a TRC test ratio of 1.97. Table 56 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 50%.

Table 56. Small C&I Custom Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$100,567
NPV Costs	\$51,034
Net Benefits	\$49,533
Benefit/Cost Ratio	1.97

Demand Response Program – Small C&I

Program Description

The Small C&I Demand Response Program is a load curtailment type program for nonresidential customers. Through the program, PPL Electric offers incentives to customers who reduce their demand during specific curtailment events. Participating customers must commit to providing a minimum of 100 kW of load reduction when called upon by the Demand Response CSP.

Participants in the Demand Response Program may also be enrolled in PJM's ELRP. As required in the Pa PUC's Implementation Order, PPL Electric designed the EE&C Plan to ensure that the cost to acquire peak demand reductions from customers who participate in PJM's ELRP is no more than half the cost to acquire peak demand reductions from customers in the same rate class that are not participating in PJM's ELRP. Because customers can change their enrollment status throughout Phase III and some customers may not participate in Act 129 demand response events in every program year, PPL Electric must wait until the conclusion of PY12 to demonstrate compliance with the acquisition cost requirement. The Demand Response CSP will manage and coordinate the Small C&I Demand Response Program, providing turnkey services.

In accordance with the Implementation Order, PPL Electric will call curtailment events as follows.

- Curtailment events shall be limited to the months of June through September.
- Curtailment events shall be called for the first six days that a peak hour of PJM's day-ahead forecast¹⁵ for the PJM RTO is greater than 96% of the PJM RTO summer peak demand forecast¹⁶ for the months of June through September each program year.
- Each curtailment event shall last four consecutive hours.
- Each curtailment event shall be called such that it will occur during the day's forecasted highest peak hour above 96% of PJM's RTO summer peak demand forecast.
- Once six curtailment events have been called in a program year, the Demand Response Program shall be suspended for that program year.
- The reductions attributable to a four consecutive hour curtailment event will be based on the average MW reduction achieved during each hour of that event.

¹⁵ PPL Electric will use the PJM seven-day load forecast, which is available online: <http://www.pjm.com/markets-and-operations/energy/real-time/7-day-load-forecast.aspx>. Unless the Pa PUC or SWE establishes procedures otherwise, PPL Electric expects to use the PJM day-ahead forecast posted at approximately noon the day before each operating day.

¹⁶ PPL Electric will use Table B-1 of the annual PJM Load Forecast Report. The January 2015 report is available online: <http://www.pjm.com/~media/documents/reports/2015-load-forecast-report.ashx> and <http://www.pjm.com/~media/documents/reports/2015-load-report-data-xls.ashx>.

- Compliance will be determined based on the average MW reductions achieved from events called in the last four years of the program.

Based on these criteria, there could be zero to six curtailment events in each of the final four program years. There could be zero to 24 total events over the entire Phase III Demand Response Program across all of the applicable sectors (i.e., Small C&I, Large C&I and GNE).

During Program Year 8, PPL Electric will determine if it (or the Demand Response CSP) will bid peak reductions from the Demand Response Program¹⁷ and/or peak reductions from energy efficiency programs into the PJM Capacity Market. If PPL Electric or its Demand Response CSP bids into the PJM Capacity Market, PPL Electric will allocate the revenue received from successful bidding to the customer class from which the peak load reductions were acquired.

Objectives

The objectives of the Small C&I Demand Response Program are to:

- Cost-effectively deliver at least 92 MW of peak load reductions (all customer sectors combined). Peak load reductions will be determined based on the average of the MW reductions obtained from each event over the last four years of Phase III; and
- Achieve at least 85% of the peak demand reduction compliance target in every four-hour event. For PPL Electric, this requires a minimum of 78.2 MW in each event.

Target Market

The program will target nonresidential customers for this program who have the ability to curtail a minimum of 100 kW. The program will be available to customers in a nonresidential rate class and any building or business type.

Implementation Strategy

PPL Electric staff will manage the Demand Response CSP, who will provide turnkey services to deliver the program to customers, including marketing, customer recruitment, trade ally support, negotiating agreements with participants, providing customer care, determining when to call curtailment events and notifying participants accordingly, processing incentives, installing equipment (such as meters to measure customers' reduction in peak demand), and calculating peak load reductions. PPL Electric's

¹⁷ It is unclear whether PPL Electric is permitted to bid all of its peak reductions from its Act 129 Demand Response Program into PJM. Pages 143 to 144 of the Pa PUC's Phase III Implementation Order states: "We accept the Industrials' recommendation to require the EDCs to document in their EE&C Plans whether they intend to bid resources into the market. We note that as the peak demand reduction program does not permit dual participation in the Act 129 program and the PJM ELRP [PPL believes this is a typo since the Pa PUC does permit dual participation], neither the EDCs nor the customer will be permitted to bid Act 129 DR into the PJM ELRP program."

energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Key steps in this program include:

- Educating customers on demand response and recruiting them to the program;
- Having customers complete program applications/agreements and ensuring they have the necessary documentation and methods to reduce peak load;
- Verifying that the applicant is an eligible PPL Electric customer and the customer site meets program eligibility criteria;
- Monitoring PJM load forecasts to determine the applicable hours for each demand response event;
- Notifying participants of demand response events;
- Determining the peak reductions provided by each participant and the entire program as a whole for each demand response event, and calculating the average reductions for all demand response events to date; and
- Processing participant incentives.

Program Issues, Risks, and Risk Management Strategy

Table 57 presents market risks associated with the Small C&I Demand Response Program, as well as strategies PPL Electric will use to manage each risk.

Table 57. Small C&I Demand Response Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customers do not understand or are not aware of the program	Customers do not participate, impacting PPL Electric’s ability to achieve its target	<ul style="list-style-type: none"> • PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early • Demand Response CSP increases the frequency of program education and outreach to customers. • Demand Response CSP provides information to help participants understand how various end uses impact their consumption.
Customer and building owner do not commonly prioritize demand response	Customer are reluctant to change business practices or impact operations	<ul style="list-style-type: none"> • PPL Electric provides adequate benefits for participation (e.g., incentives, energy management support). • Demand Response CSP enters into contracts that are for firm load reductions and include adequate incentives.

Program Issue	Risk	Risk Management Strategies
Customer may not be capable or willing to participate in every event	<ul style="list-style-type: none"> • Customers do not provide peak reductions as expected • Evaluation uncertainty: the verification and calculation of peak reductions occur well after each event and results may differ from expected reductions. SWE’s verification is more than six months after the end of each program year 	<ul style="list-style-type: none"> • Demand Response CSP oversubscribes the number of participants and MWs in every event to provide a reasonable margin for uncertainties resulting from customers who do not provide their intended peak reductions or evaluation adjustments.
The program budget is limited	Program budget (including incentives) is not sufficient to attract enough participation or customers drop out during Phase III	PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early and confirm the budget and participation levels.
PJM changes rules or the demand response market changes	<ul style="list-style-type: none"> • Rule changes at PJM could lead to a significant change (increase or decrease) in dual enrolled participants and/or the incentive levels required to attract Act 129 demand response participants 	<ul style="list-style-type: none"> • Demand Response CSP monitors PJM markets. • Demand Response CSP maintains close relationships with actual and potential demand response participants. • PPL Electric revises EE&C Plan if required.
There is an unknown number of demand response events	<ul style="list-style-type: none"> • Uncertain demand response budget due to unknown number of demand response events 	<ul style="list-style-type: none"> • PPL Electric designs the program and Demand Response CSP contract to accommodate zero to six events each program year for the last four program years of Phase III. • PPL Electric budgets for the highest possible number of demand response events (24).

Anticipated Costs to Participating Customers

Customers may experience impacts to business operations such as lost productivity and revenue. It is presumed that the Small C&I Demand Response Program incentives will cover any such costs to participating customers.

Ramp-up Strategy

The Demand Response CSP will recruit participants from currently served markets and target current customers and other curtailment service providers, as well as recruit new customers. Recruiting will take place starting in PY8.

Marketing Strategy

PPL Electric’s staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program to existing PPL Electric customers that currently participate in PJM’s ELRP; and
- Publishing marketing materials, including charts, brochures, and case studies.

Eligible Measures and Incentive Strategy

There are no specific measures prescribed by this program. Customers are asked to implement their own strategies, such as shifting or shedding load or using on-site generators. Those customers who achieve the contracted kW reduction qualify for an incentive to be distributed by the Demand Response CSP. The Demand Response CSP will negotiate incentives with individual customers, and PPL Electric will not know the incentive amounts given to each participant.

Deadline for Rebate Applications

There are no rebate applications for this program. The Demand Response CSP will pay customer incentives at the conclusion of each program year, upon verification of the peak demand reductions.

Program Start Date with Key Schedule Milestones

Table 58 lists the estimated key schedule milestones for the Small C&I Demand Response Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 58. Small C&I Demand Response Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Start to recruit participants
06/01/2017	Launch program (curtailment events can begin)
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric’s Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE’s Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate demand reductions. The Demand Response CSP will determine peak reductions for each participant in accordance with one of the methods specified in the TRM. The EM&V CSP will review each method selected to confirm it is appropriate for that participant. For the Small C&I Demand Response Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will design the evaluation plan to verify demand reduction attributable to this program, and to verify the program met all regulatory requirements. The EM&V CSP will include all participants in any regression-based analysis used to confirm the reported demand reduction.

Administrative Requirements

The Demand Response CSP will provide overall administrative and operational management of the Small C&I Demand Response Program. PPL Electric staff will provide oversight and operational support to facilitate effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 50 Small C&I customers will participate in the Demand Response Program each year (PY9 through PY12) during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 59 displays anticipated program benefits and costs by program year and in total. Approximately 10% of the demand response budget is attributed to the Small C&I Demand Response Program.

Table 59. Small C&I Demand Response Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	0	0	0	0	0	0
Demand Reduction (MW)	0.00	11.50	11.50	11.50	11.50	46.00
Total TRC Costs*	\$119	\$294	\$294	\$294	\$294	\$1,296
Participant Costs*	\$0	\$175	\$175	\$175	\$175	\$701
Direct Utility Costs	\$119	\$353	\$353	\$353	\$353	\$1,530
Customer Incentives	\$0	\$234	\$234	\$234	\$234	\$934
EDC Labor, Materials, Supplies	\$15	\$15	\$15	\$15	\$15	\$76
CSP Labor, Materials, Supplies	\$88	\$88	\$88	\$88	\$88	\$438
CSP Marketing	\$16	\$16	\$16	\$16	\$16	\$82

* Per 2016 TRC Test Order guidelines, participant costs are assumed to be 75% of the participant incentive for demand response programs. Energy efficiency program tables show participant costs net of incentives. However, given the treatment of participant costs for demand response programs, the table provides gross participant costs. Therefore, for the purposes of this table, Total TRC Costs = Participant Costs + Direct Utility Costs – Customer Incentives.

The Small C&I Demand Response Program is projected to be cost-effective, with a TRC test ratio of 2.26. Table 60 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 60. Small C&I Demand Response Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$2,487
NPV Costs	\$1,102
Net Benefits	\$1,385
Benefit/Cost Ratio	2.26

3.4 Large Commercial & Industrial Sector Programs

The following sections summarize each of PPL Electric’s proposed Large C&I sector programs. Participation levels, savings, costs, and incentive ranges are estimates and may be subject to change.

The Plan presents the Efficient Equipment, Custom, and Demand Response programs as separate programs with separate cost and savings estimates for each Nonresidential customer sector (i.e., Small C&I, Large C&I, and GNE), as required by the Commission’s EE&C Plan Template. However, as was shown in Figure 3 in Section 3.1.2, PPL Electric will offer each of these programs to all nonresidential customer sectors as unified nonresidential offerings.

For master-metered multifamily buildings in a nonresidential rate class that has low-income occupants, PPL Electric will provide LED bulbs in the living units at no cost. If the owners/managers of master-metered multifamily buildings desire energy efficiency improvements for common areas (e.g., vestibule, basement, hallways, exterior) or additional measures (e.g., appliance recycling, appliances, HVAC, water heaters) in the living units, those measures will be implemented through the applicable nonresidential program and subject to that program’s eligibility requirements and incentive levels.

Consistent with the Pa PUC’s 2016 TRC Test Order, PPL Electric will apply the portion of savings attributable to low-income occupants in master-metered multifamily buildings toward the low-income savings compliance target. PPL Electric will work with the SWE and other Pennsylvania EDCs to determine how these savings will be shown in formal reports. As requested by most stakeholders, PPL Electric recommends showing the total savings for each project under the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies. PPL Electric will apply the portion of savings attributable to low-income occupants toward the low-income compliance target and will report these savings separately from other low-income savings (income-qualified customers in the Residential rate class).

PPL Electric will also assign the costs for measures installed in master-metered multifamily buildings to the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies.¹⁸ PPL Electric does not expect the savings or costs associated with installing LED bulbs in tenant units of master-metered multifamily buildings to be significant (approximately less than 5,000 MWh/year in savings and less than \$1 million in costs).

¹⁸ GNE costs will be ultimately assigned to the appropriate customer rate class as described in the Cost Recovery Mechanism section of this EE&C Plan.

Efficient Equipment Program – Large C&I

Program Description

Through the Large C&I Efficient Equipment Program, PPL Electric promotes the purchase and installation of a wide range of high-efficiency equipment, including lighting, HVAC, and other measures specifically for Large C&I customers. The Company provides customers with financial incentives based on the measure installed and savings provided, which offset the higher purchase costs of energy efficient equipment. Additionally, PPL Electric offers program information on the features and benefits of energy efficient equipment.

PPL Electric will begin utilizing a midstream lighting delivery channel in Phase III, most likely in late PY8 or thereafter. PPL Electric designed the midstream lighting component to make choosing and procuring high-efficiency lighting more straightforward and faster than via typical downstream methods. In the midstream approach, trade allies and customers may purchase LED lamps and bulbs directly from a participating and qualified midstream lighting distributor and receive an immediate rebate/discount at the point of purchase. This approach is expected to increase customer and trade ally satisfaction; increase the volume of installed, high-efficiency lighting and socket upgrades, particularly for customers implementing routine lighting projects; and reduce the number of contractors and customers who use high-efficiency lighting products but fail to submit program applications.

The Nonresidential CSP will provide all nonresidential customers with synergies and a streamlined “one stop” experience. The Nonresidential CSP will manage and coordinate the Large C&I Efficient Equipment Program, maintaining a call and rebate processing center, recruiting and educating trade allies, and marketing the program to facilitate continued program participation and encourage customers to take a whole-building approach or to implement multiple measures.

Objectives

The objectives of the Large C&I Efficient Equipment Program are to:

- Provide energy-saving opportunities to qualified customers;
- Increase the market penetration of high-efficiency technologies and building systems for customers by incentivizing high-efficiency and ENERGY STAR-rated equipment such as appliances, lighting equipment, and HVAC systems;
- Engage trade allies to stock, promote and provide high-efficiency technology options to customers;
- Promote other PPL Electric energy efficiency programs;
- Collect energy and operating data from customers, as required to confirm customer and measure eligibility, and to determine energy savings and cost-effectiveness;
- Obtain participation necessary to achieve approximately 134,000 MWh/year verified gross savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Efficient Equipment Program will be available to customers in a nonresidential rate class and any building or business type. The Nonresidential CSP will specifically target customer segments such as office buildings, hospitals, universities, large hotels, retail, and manufacturing and industrial facilities. For the midstream lighting component, PPL Electric will target and leverage the midstream channel to deploy specific LED technologies and other potential equipment deemed cost-effective.

Implementation Strategy

The Nonresidential CSP will deliver the Large C&I Efficient Equipment Program, promoting the various energy efficiency options available to this customer segment through a range of marketing and outreach tactics. The program relies on projects being initiated by customers, as well as on trade allies—including mid-stream equipment distributors—and the Nonresidential CSP. The Nonresidential CSP will leverage trade ally and manufacturer relationships to co-market energy efficient equipment and the value of program participation. The Nonresidential CSP will develop, update, and process rebate applications and payments for the Large C&I Efficient Equipment Program. The EM&V CSP will provide evaluation services. PPL Electric staff will manage the Nonresidential CSP.

Key steps in this program include:

- Educating customers on energy efficiency opportunities and directing them to the program through marketing activities, the website, and/or direct contact with equipment distributors or equipment installation contractors/trade allies;
- Having customers complete program applications, or working with customers, equipment/appliance retailers, mid-stream distributors, and installation contractors to complete program applications;
- Ensuring customers have required documentation to submit for processing;
- Reviewing pending and completed project documentation to verify the applicant is a PPL Electric customer and the completed project and installed equipment meets program eligibility criteria;
- When applicable, working with customers to confirm project preapproval before ordering energy efficiency equipment;
- Recruiting and developing an effective trade ally network;
- Processing completed projects and issuing rebates for qualified projects/equipment; and
- Verifying completed equipment/appliance installation for a sample of participants to confirm program integrity as a part of M&V.

Program Issues, Risks, and Risk Management Strategy

Table 61 presents market risks associated with the Large C&I Efficient Equipment Program, as well as strategies PPL Electric will use to manage each risk.

Table 61. Large C&I Efficient Equipment Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner	<ul style="list-style-type: none"> • Decision-makers choose to install 	<ul style="list-style-type: none"> • PPL Electric offers incentives and

Program Issue	Risk	Risk Management Strategies
does not prioritize energy efficiency	<p>cheaper, less efficient equipment with shorter payback/IRR, resulting in lower savings</p> <ul style="list-style-type: none"> • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<p>programs to reduce payback and IRR for business owners.</p> <ul style="list-style-type: none"> • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails, and encourages businesses to plan for equipment replacement. • PPL Electric provides incentives for trade allies to stock, promote, and install efficient measures.
Customers are unaware of the benefits of installing and properly maintaining energy efficient equipment	<ul style="list-style-type: none"> • Customers do not properly maintain equipment so savings and benefits erode over time 	<ul style="list-style-type: none"> • Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by Large C&I customers participating in the Large C&I Efficient Equipment Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The Large C&I Efficient Equipment Program is an existing program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP has developed a transitional incentive strategy aiming to bridge incentives for customers whose participation spans Phase II and Phase III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III:

- Projects on the Phase II waitlist will receive comparable incentives if completed and installed in early Phase III. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.
- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., in service) in Phase III will be eligible for the approved Phase II rebate, and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric’s staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Leveraging trade ally and manufacturer relationships to co-market energy efficient equipment;
- Hosting webinars;
- Participating in trade shows and other outreach;
- Publishing marketing materials including charts, brochures, and case studies;
- Providing newsletters and coordinating with key market partners including trade associations and agencies;
- Advertising in local newspapers and other mass media;
- Using limited time offers, special promotions and no-cost measures to promote energy efficiency;
- Offering trade ally incentives and rewards;
- Cross-promoting through other PPL Electric energy efficiency programs;
- Providing information and training for specific technologies directed towards niche markets;
- Incorporating large customers in area or territory focused promotions and blitzes; and
- Working with distributors to promote and incent bulb and fixture purchases to capture program opportunities missed by other outreach methods.

Eligible Measures and Incentive Strategy

PPL Electric will offer rebates and incentives to qualified customers (or trade allies, depending on the delivery channel) who submit completed applications and documentation of the efficiency measures installed. Customers will have the option to assign rebate payments to a third party.

For all measures offered through the Large C&I Efficient Equipment Program, PPL Electric will provide incentives in the range of \$0.03 to \$0.17 per kWh saved. Incentives may be capped at 50% to 100% of the total project cost (excluding internal labor).

PPL Electric may distribute lighting measures to customers through the traditional rebate, direct discount (i.e., incentive paid to trade ally), or midstream mechanism. Table 62 identifies PPL Electric’s proposed list of program measures and minimum eligibility qualifications.

Table 62. Large C&I Efficient Equipment Program Eligible Measures and Incentives

Measure	Eligibility Qualifications
HVAC	
ASHP (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
ASHP (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Air-Cooled DX (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009

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Measure	Eligibility Qualifications
Air-Cooled DX (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Electric Chiller	Exceed IECC 2009 energy efficiency requirements
Water Source or Geothermal Heat Pump	Exceed IECC 2009 energy efficiency requirements
ECM Circulating Fan	Baseline: SP or PSC evaporator fan motors in an air handling unit
Ductless Heat Pump	SEER \geq 16
Other HVAC Measure Listed in the TRM	Meets current TRM requirements
VFD	
VFD	Baseline: motor fan or pump without a VFD control
Food Service and Hospitality	
VSD Kitchen Exhaust Fan	Retrofit kitchen ventilation system with VSD, demand controls, and sensors
Low-Flow Pre-Rinse Sprayer (Food Service and Grocery)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 2.25 gpm food service; 2.15 gpm grocery applications
Low-Flow Pre-Rinse Sprayer (Time of Sale/Retail)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 1.52 gpm
Steam Cooker	ENERGY STAR
Ice Maker	ENERGY STAR or CEE tier 2
Beverage/Snack Machine Control	Added to non-ENERGY STAR machines
Guest Room Occupancy Sensor	Replace guest rooms occupancy sensors with manual heating/cooling set-point and fan on/off/auto thermostat controls
Lighting	
LED Exit Sign	Replace incandescent or fluorescent exit sign
Occupancy Sensor	Wall, ceiling, or fixture mounted
T5	New T5 lamps and ballasts
T8 High Performance Fixture	Retrofit fixture with qualified high performance T8 lamps and ballast (cee1.org list)
High Performance T8 Lamp	Retrofit standard T8 with qualified high performance T8 (cee1.org list)
T8 Reduced Wattage Fixture	Retrofit fixture with qualified reduced wattage T8 lamps and ballast (cee1.org list)
Reduced Wattage T8 Lamp	Retrofit standard T8 with qualified reduced wattage T8 (cee1.org list)
High Bay T5, T8, LED	New T5, T8, LED fixture
De-Lamp and Install Reflectors	Replace existing T5, T8 fixture with one or more lamps removed, must include electronic ballast and reflector
LED Lamp	Replace existing incandescent lamp or CFLs with ENERGY STAR or Lighting Facts LED
Metal Halide Pulse Start Lamps	Replace probe start (\leq 320watts, > 320 watts)
LED Street Light/Area Light	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
LED Interior Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Induction Lighting	New fixtures or retrofit kits
Interior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007 and Building Area Method or Space-by-Space Method
Exterior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007; Baseline Exterior Lighting Power Densities

Measure	Eligibility Qualifications
LED Wall Pack	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Reach-in Refrigeration Case Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Other Lighting and Controls Listed in the TRM	Listed in the TRM or PA Lighting Form Provides energy savings
Compressed Air	
VSD Air Compressor	Single VSD unit less than 75 hp
Cycling Refrigerated Thermal Mass Dryer	Baseline: non-cycling (e.g., continuous) air dryer with a capacity of 600 cfm or below. The replacement of desiccant, deliquescent, heat-of-compression, membrane, or other types of dryers does not qualify under this measure
Air-Entraining Air Nozzle	Replace non-air entraining air nozzle (open copper tube of 1/8-inch or 1/4-inch orifice diameter) with an energy efficient air-entraining air nozzle that uses less than 15 cfm at 100 psi for industrial applications
No-Loss Condensate Drain	Retrofit existing timed drained system with new no-loss condensate drains
Air Tank for Load/No Load Compressor	Minimum storage ratio of 4 gallons per CFM
Refrigeration	
High-Efficiency Refrigeration/Freezer Case	Must exceed federal efficiency standards
High-Efficiency Evaporator Fan Motor for Reach-In or Walk-in Refrigerated Case	Replace existing SP evaporator fan motors or PSC motors in reach-in or walk-in refrigerated display cases with an ECM
Evaporator Fan Controller	Install in medium-temperature walk-in coolers and low-temperature walk-in freezers
FHPC	Baseline: refrigeration system without FHPC
Anti-Sweat Heater Control	Retrofit existing glass doors with uncontrolled heaters
Evaporator Coil Defrost Control	Retrofit existing walk-in coolers or freezers without defrost controls
VSD Refrigeration Compressor	Retrofit existing commercial refrigeration systems without VSD controls
Strip Curtains for Walk-In Coolers and Freezers	Install or retrofit strip curtains in commercial walk-in cooler and freezer doors
Night Cover for Display Case	Install on existing open-type refrigerated display cases, where covers are deployed during the facility's unoccupied hours
Auto Closer	Retrofit doors not equipped with auto-closers, and assume the doors have strip curtain for walk-in coolers and freezers
Door Gaskets for Walk-in and Reach-in Coolers and Freezers	Replace worn-out gaskets with new, better fitting gaskets
Doors with Low or No Anti-Sweat Heat for Low Temperature Cases	Install a no-heat/low-heat clear glass door on an upright display case
Suction Pipe Insulation for Walk-In Coolers and Freezers	Insulate bare refrigeration suction pipes for walk-in coolers and freezers
Refrigerated Display Case Doors	Retrofit existing vertical open display cases with zero heat doors
Office Equipment	
ENERGY STAR Server	Replace existing servers in a data center or server closet with new ENERGY STAR servers of similar computing capacity
PC Power Management	Any software that meets Pacific Northwest RTF Networked Computer Power Management Control Software Specifications
Smart Strip Plug Outlet	Replace existing standard strip plug outlet with smart strip plug
Agricultural	

Measure	Eligibility Qualifications
Programmable Thermostat	Units controlling central air conditioner, electric heat, or resistance
VSD Controller for Dairy Vacuum Pumps	UL listed, meets IEEE standards
Circulating Fans	Must be tested by AMCA
High Volume, Low Speed Fans	Must be tested by AMCA; >16 feet in diameter
Dairy Scroll Compressor Controller	VSD controllers for dairy vacuum pumps, UL listed and meeting IEEE harmonic control standards
Low-Pressure Irrigation System	Replace systems operating on 50% or less than existing system pressure
Livestock Waterer	Thermostatically-controlled with 2-inches or more of factory-installed insulation
Heat Reclaimer	Meets current TRM requirements
Automatic Milker Take-Offs	Automatic milker take-offs that determine milking end time
Non-Electric High-Efficiency Central Heat (gas, oil, propane)	Meets current TRM requirements Max. of 250 units across all customer sectors/programs

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the installation of multiple measures or a more comprehensive whole facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee the program funding.

Program Start Date with Key Schedule Milestones

The Large C&I Efficient Equipment Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 63 lists the estimated key schedule milestones for the Large C&I Efficient Equipment Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 63. Large C&I Efficient Equipment Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Large C&I Efficient Equipment Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an Evaluation Plan and sampling protocol that fits the program prescriptive rebates and midstream incentive delivery channel. As part of this process, the EM&V CSP will review a sample of participant and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment may be included as a verification activity.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the Large C&I Efficient Equipment Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 500 Large C&I customers will participate in the Large C&I Efficient Equipment Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 64 displays anticipated program benefits and costs by program year and in total. Approximately 13% of the Nonresidential sector budget is attributed to the Large C&I Efficient Equipment Program.

Table 64. Large C&I Efficient Equipment Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	24,198	24,233	29,485	27,971	27,916	133,803
Demand Reduction (MW)*	3.27	3.28	3.99	3.79	3.78	18.11
Total TRC Costs	\$9,665	\$9,717	\$12,211	\$11,599	\$11,177	\$54,370
Participant Costs	\$6,106	\$6,691	\$8,448	\$7,941	\$8,322	\$37,508
Direct Utility Costs	\$3,560	\$3,027	\$3,763	\$3,659	\$2,855	\$16,862
Customer Incentives	\$2,196	\$1,662	\$1,790	\$1,746	\$1,344	\$8,738
EDC Labor, Materials, Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, Supplies	\$1,142	\$1,143	\$1,750	\$1,691	\$1,288	\$7,014
CSP Marketing	\$147	\$147	\$147	\$147	\$147	\$736

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Large C&I Efficient Equipment Program is projected to be cost-effective, with a TRC test ratio of 1.31. Table 65 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 75%.

Table 65. Large C&I Efficient Equipment Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$61,388
NPV Costs	\$46,867
Net Benefits	\$14,520
Benefit/Cost Ratio	1.31

Custom Program – Large C&I

Program Description

Through the Large C&I Custom Program, PPL Electric provides financial incentives to customers who install measures that are not offered in PPL Electric’s other programs, including measures that are not addressed in the TRM. These measures may include new or replacement energy efficient equipment, retro-commissioning, repairs, equipment optimization, new construction projects, operational and process improvements, and CHP projects that result in cost-effective energy efficiency savings. The Company will emphasize compressed air projects to maximize the savings available from this high value measure in the Large C&I sector. The Nonresidential CSP will conduct targeted outreach and marketing to both trade allies and customers.

The Nonresidential CSP will support all sector-level program functions, including operating a customer call center, marketing, developing and maintaining an effective trade ally network, processing customer incentives, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Objectives

The objectives of the Large C&I Custom Program are to:

- Encourage PPL Electric Large C&I sector customers to take a comprehensive, whole-facility approach to energy efficiency by installing high-efficiency custom measures or processes;
- Encourage qualifying equipment repairs, optimization, and operational or process changes that reduce electricity consumption;
- Encourage a whole facility approach to energy efficiency;
- Increase customer awareness of the features and benefits of energy efficient equipment;
- Increase the market penetration of high-efficiency equipment;
- Support emerging technologies and non-typical efficiency solutions in cost-effective applications;
- Encourage advanced energy efficiency strategies required for certification by national market transformation programs such as LEED, Architecture 2030, or ENERGY STAR Buildings;
- Promote other PPL Electric energy efficiency programs;
- Obtain participation necessary to achieve approximately 163,000 MWh/year verified gross savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Custom Program will be available to customers in a nonresidential rate class and any building or business type. Customers occupying rental property must have the owner’s approval to participate.

Implementation Strategy

PPL Electric relies on the Nonresidential and EM&V CSPs and trade allies for program implementation. The Nonresidential CSP will handle customer intake, routing, and application processing. The Nonresidential CSP will work directly with trade allies and customers to help identify, develop, and implement custom projects. The Nonresidential CSP will develop project scopes, analyze costs, and determine potential energy savings of proposed projects, as well as conduct field verification of completed projects and help determine the reported energy savings from installed projects. The EM&V CSP will conduct independent evaluations to determine verified savings.

Program Issues, Risks, and Risk Management Strategy

Table 66 presents market risks associated with the Large C&I Custom Program, as well as strategies PPL Electric will use to manage each risk.

Table 66. Large C&I Custom Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner does not prioritize energy efficiency	<ul style="list-style-type: none"> • Decision-makers choose to install cheaper, less efficient equipment with a shorter payback/IRR, resulting in lower savings • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<ul style="list-style-type: none"> • PPL Electric offers incentives and programs to reduce payback and IRR for business owners. • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails, and encourages business to plan for equipment replacement. • PPL Electric provides incentives for trade allies to stock, promote, and install efficient measures.
Customers are unaware of the benefits of installing and properly maintaining energy efficient equipment	Customers do not properly maintain equipment so savings and benefits erode over time	Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by Large C&I customers participating in the Large C&I Custom Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The Large C&I Custom Program is an existing program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP developed a transitional incentive strategy aiming to bridge incentives for customers whose participation in the program spans Phase II and Phase III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III:

- Projects on the Phase II waitlist that are completed and installed in early Phase III will receive comparable incentives. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.
- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., placed in service) in Phase III will be eligible for the approved Phase II rebate, and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric's staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Communicating and providing access to program information on the EE&C program website;
- Promoting the program in newsletters;
- Advertising using newspaper, radio, direct mail, bill inserts, cross-program advertisements, commercial ads, and other mass media;
- Coordinating advertising opportunities with trade allies;
- Developing, publishing, and distributing program brochure and case studies;
- One-on-one marketing to Large C&I customers through trade allies, business accounts specialists, and Nonresidential CSP outreach;
- Targeting marketing to facility managers, building or process engineers, building owners and managers associations, HVAC contractors, energy services firms, architects and engineers, real estate developers, economic development organizations, customer advocacy groups, trade associations, and other trade allies to encourage the installation of new energy efficient technologies and adoption of best operating practices;
- Providing specific outreach to individual tenants as well as building owners and property managers in leased commercial buildings to encourage participation in the program;
- Offering trade ally incentives and rewards;
- Targeting specific sectors identified as having a high level of unrealized energy efficiency potential; and
- Providing limited time offers.

Eligible Measures and Incentive Strategy

PPL Electric provides incentives following successful implementation of a cost-effective project. The Company offers performance incentives based on the avoided or reduced kWh/year resulting from the project. Incentives may be capped at 50% to 100% of the total project costs (excluding internal labor) and are subject to an annual cap for each project and for each participating customer. The per-customer-site cap is defined as one building with one or more meters. A parent company cap will apply to a campus setting or multiple buildings (on the same property or in different locations) with a common owner.

Program measures, eligibility requirements, and incentives may change to reflect progress, changes in the TRM, changes in market conditions, or other factors. Examples of custom projects include chiller replacements, air compressor improvements, equipment control projects, and experimental technologies. Table 67 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges.

Table 67. Large C&I Custom Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range
Custom Nonresidential	Projects must meet a TRC test greater than 1.1. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% - 100% of the total project cost (excluding internal labor)	Average \$0.05 - \$0.14 per annual kWh saved
CHP	Projects must meet a TRC test greater than 1.25. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% of the total project cost (excluding internal labor)	Average \$0.02 - \$0.10 per annual kWh saved

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the recycling of older equipment, the installation of multiple measures, or a more comprehensive whole home/facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee program funding. For the Large C&I Custom Program, PPL Electric may require preapproval to allow time

for the Company (or the Nonresidential CSP) to qualify the project, minimize free-ridership, screen for cost-effectiveness, determine the site-specific M&V plan, and conduct pre-metering if required.

Program Start Date with Key Schedule Milestones

The Large C&I Custom Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 68 lists the estimated key schedule milestones for the Large C&I Custom Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 68. Large C&I Custom Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the Large C&I Custom Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an Evaluation Plan and sampling protocol that fits each component for the Large C&I Custom Program (i.e., custom incentives, CHP, PC power management, and compressed air measures). The EM&V CSP will also develop site-specific M&V plans to meet Act 129 evaluation requirements.

As part of the EM&V activities, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment will be included as a verification activity for the Large C&I Custom Program.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the Large C&I Custom Program. PPL Electric staff will provide oversight and operational support to establish effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 185 Large C&I customers will participate in the Large C&I Custom Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 69 displays anticipated program benefits and costs by program year and in total. Approximately 15% of the Nonresidential sector budget is attributed to the Large C&I Custom Program.

Table 69. Large C&I Custom Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	20,905	23,271	39,584	39,719	39,719	163,197
Demand Reduction (MW)*	2.83	3.15	5.36	5.38	5.38	22.09
Total TRC Costs	\$7,371	\$8,174	\$10,944	\$10,973	\$10,773	\$48,236
Participant Costs	\$4,129	\$5,140	\$6,595	\$6,574	\$6,773	\$29,211
Direct Utility Costs	\$3,242	\$3,034	\$4,349	\$4,399	\$4,000	\$19,025
Customer Incentives	\$1,897	\$1,596	\$2,067	\$2,111	\$1,913	\$9,583
EDC Labor, Materials, and Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, and Supplies	\$1,074	\$1,167	\$2,011	\$2,016	\$1,816	\$8,085
CSP Marketing	\$196	\$196	\$196	\$196	\$196	\$981

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The Large C&I Custom Program is projected to be cost-effective, with a TRC test ratio of 1.84. Table 70 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 50%.

Table 70. Large C&I Custom Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$75,773
NPV Costs	\$41,242
Net Benefits	\$34,530
Benefit/Cost Ratio	1.84

Demand Response Program – Large C&I

Program Description

The Large C&I Demand Response Program is a load curtailment type program for nonresidential customers. Through the program, PPL Electric offers incentives to customers who reduce their demand during specific curtailment events. Participating customers must commit to providing a minimum of 100 kW of load reduction when called upon by the Demand Response CSP.

Participants in the Demand Response Program can also be enrolled in PJM's ELRP. As required in the Pa PUC's Implementation Order, PPL Electric designed the EE&C Plan to ensure that the cost to acquire peak demand reductions from customers who participate in PJM's ELRP is no more than half the cost to acquire peak demand reductions from customers in the same rate class that are not participating in PJM's ELRP. Because customers can change their enrollment status throughout Phase III and some customers may not participate in Act 129 demand response events in every program year, PPL Electric must wait until the conclusion of PY12 to demonstrate compliance with the acquisition cost requirement. The Demand Response CSP will manage and coordinate the Large C&I Demand Response Program, providing turnkey services.

In accordance with the Implementation Order, PPL Electric will call curtailment events as follows.

- Curtailment events shall be limited to the months of June through September.
- Curtailment events shall be called for the first six days that a peak hour of PJM's day-ahead forecast¹⁹ for the PJM RTO is greater than 96% of the PJM RTO summer peak demand forecast²⁰ for the months of June through September each program year.
- Each curtailment event shall last four consecutive hours.
- Each curtailment event shall be called such that it will occur during the day's forecasted highest peak hour above 96% of PJM's RTO summer peak demand forecast.
- Once six curtailment events have been called in a program year, the Demand Response Program shall be suspended for that program year.
- The MW reductions attributable to a four consecutive hour curtailment event will be based on the average MW reduction achieved during each hour of that event.

¹⁹ PPL Electric will use the PJM seven-day load forecast, which is available online: <http://www.pjm.com/markets-and-operations/energy/real-time/7-day-load-forecast.aspx>. Unless the Pa PUC or SWE establishes procedures otherwise, PPL Electric expects to use the PJM day-ahead forecast posted at approximately noon the day before each operating day.

²⁰ PPL Electric will use Table B-1 of the annual PJM Load Forecast Report. The January 2015 report is available online: <http://www.pjm.com/~media/documents/reports/2015-load-forecast-report.ashx> and <http://www.pjm.com/~media/documents/reports/2015-load-report-data-xls.ashx>.

- Compliance will be determined based on the average MW reductions achieved from events called in the last four years of the program.

Based on these criteria, there could be zero to six curtailment events in each of the final four program years. There could be zero to 24 total events over the entire Phase III Demand Response Program across all of the applicable sectors (i.e., Small C&I, Large C&I, and GNE).

During Program Year 8, PPL Electric will determine if it (or the Demand Response CSP) will bid peak reductions from the Demand Response Program²¹ and/or peak reductions from energy efficiency programs into the PJM Capacity Market. If PPL Electric or its Demand Response CSP bids into the PJM Capacity Market, PPL Electric will allocate the revenue received from successful bidding to the customer class from which the peak load reductions were acquired.

Objectives

The objectives of the Large C&I Demand Response Program are to:

- Cost-effectively deliver at least 92 MW of peak load reductions (all customer sectors combined). Peak load reductions will be determined based on the average of the MW reductions obtained from each event over the last four years of Phase III.
- Achieve at least 85% of the peak demand reduction compliance target in every four-hour event. For PPL Electric, this requires a minimum of 78.2 MW in each event.

Target Market

The program will target nonresidential customers for this program who have the ability to curtail a minimum of 100 kW. The program will be available to customers in a nonresidential rate class and any building or business type.

Implementation Strategy

PPL Electric staff will manage the Demand Response CSP, who will provide turnkey services to deliver the program to customers, including marketing, customer recruitment, trade ally support, negotiating agreements with participants, providing customer care, determining when to call curtailment events and notifying participants accordingly, processing incentives, installing equipment (such as meters to measure customers' reduction in peak demand), and calculating peak load reductions. PPL Electric's

²¹ It is unclear whether PPL Electric is permitted to bid all of its peak reductions from its Act 129 Demand Response Program into PJM. Pages 143 to 144 of the Pa PUC's Phase III Implementation Order states: "We accept the Industrials' recommendation to require the EDCs to document in their EE&C Plans whether they intend to bid resources into the market. We note that as the peak demand reduction program does not permit dual participation in the Act 129 program and the PJM ELRP [PPL believes this is a typo since the Pa PUC does permit dual participation], neither the EDCs nor the customer will be permitted to bid Act 129 DR into the PJM ELRP program."

energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Key steps in this program include:

- Educating customers on demand response and recruiting them to the program;
- Having customers complete program applications/agreements and ensuring they have the necessary documentation and methods to reduce peak load;
- Verifying that the applicant is an eligible PPL Electric customer and the customer site meets program eligibility criteria;
- Monitoring PJM load forecasts to determine the applicable hours for each demand response event;
- Notifying participants of demand response events;
- Determining the peak reductions provided by each participant and the entire program as a whole for each demand response event and calculating the average reductions for all demand response events to date; and
- Processing participant incentives.

Program Issues, Risks, and Risk Management Strategy

Table 71 presents market risks associated with the Large C&I Demand Response Program, as well as strategies PPL Electric will use to manage each risk.

Table 71. Large C&I Demand Response Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customers do not understand or are not aware of the program	Customers do not participate, impacting PPL Electric’s ability to achieve its target	<ul style="list-style-type: none"> • PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early • Demand Response CSP increases the frequency of program education and outreach to customers. • Demand Response CSP provides information to help participants understand how various end uses impact their consumption.
Customer and building owner do not commonly prioritize demand response	Customer are reluctant to change business practices or impact operations	<ul style="list-style-type: none"> • PPL Electric provides adequate benefits for participation (e.g., incentives, energy management support). • Demand Response CSP ensures that contracts are for firm load reductions and include adequate incentives and penalties.

Program Issue	Risk	Risk Management Strategies
Customer may not be capable or willing to participate in every event	<ul style="list-style-type: none"> • Customers do not provide peak reductions as expected • Customers are not able to maintain comfort levels during cycling events • Evaluation uncertainty: the verification and calculation of peak reductions occur well after each event and results may differ from expected reductions. SWE’s verification is more than six months after the end of each program year 	<ul style="list-style-type: none"> • Demand Response CSP oversubscribes the number of participants and MWs in every event to provide a reasonable margin for uncertainties resulting from customers who do not provide their intended peak reductions or evaluation adjustments. • Demand Response CSP uses proven technologies that prevent large temperature swings.
The program budget is limited	Program budget (including incentives) is not sufficient to attract enough participation or customers drop out during Phase III	PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early and confirm the budget and participation levels.
PJM changes rules or the demand response market changes	Rule changes at PJM could lead to a significant change (increase or decrease) in dual enrolled participants and/or the incentive levels required to attract Act 129 demand response participants	<ul style="list-style-type: none"> • Demand Response CSP monitors PJM markets. • Demand Response CSP maintains close relationships with actual and potential demand response participants. • PPL Electric revises EE&C Plan if required.
There is an unknown number of demand response events	Uncertain demand response budget due to unknown number of demand response events	<ul style="list-style-type: none"> • PPL Electric designs the program and Demand Response CSP contract to accommodate zero to six events per program year in the final four program years of Phase III. • PPL Electric budgets for the highest possible number of demand response events (24).

Anticipated Costs to Participating Customers

Customers may experience impacts to business operations, such as lost productivity and revenue. It is presumed that acceptance of the Large C&I Demand Response Program incentives will cover any such costs to participating customers.

Ramp-up Strategy

The Demand Response CSP will recruit participants from currently served markets and target current customers and other curtailment service providers, as well as recruit new customers. Recruiting will take place starting in PY8.

Marketing Strategy

PPL Electric’s staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program to existing PPL Electric customers that currently participate in PJM’s ELRP; and
- Publishing marketing materials, including charts, brochures, and case studies.

Eligible Measures and Incentive Strategy

There are no specific measures prescribed by this program. Customers are asked to implement their own strategies, such as shifting or shedding load or using on-site generators. Those customers who achieve the contracted kW reduction qualify for an incentive to be distributed by the Demand Response CSP. The Demand Response CSP will negotiate incentives with individual customers, and PPL Electric will not know the incentive amounts given to each participant.

Deadline for Rebate Applications

There are no rebate applications for this program. The Demand Response CSP will pay customer incentives at the conclusion of each program year, upon verification of the peak demand reductions.

Program Start Date with Key Schedule Milestones

Table 72 lists the estimated key schedule milestones for the Large C&I Demand Response Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 72. Large C&I Demand Response Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Start to recruit participants
06/01/2017	Launch program (curtailment events can begin)
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric’s Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE’s Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate demand reductions. The Demand Response CSP will determine peak reductions for each participant in accordance with one of the methods specified in the TRM. The EM&V CSP will review each method

selected to confirm it is appropriate for that participant. For the Large C&I Demand Response Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will design the evaluation plan to verify demand reduction attributable to this program, and to verify the program met all regulatory requirements. The EM&V CSP will include all participants in any regression-based analysis used to confirm reported demand reduction.

Administrative Requirements

The Demand Response CSP will provide overall administrative and operational management of the Large C&I Demand Response Program. PPL Electric staff will provide oversight and operational support to facilitate effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 40 Large C&I customers will participate in the Large C&I Demand Response Program each year (i.e., PY9 – PY12) during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 73 displays anticipated program benefits and costs by program year and in total. Approximately 50% of the demand response budget is attributed to the Large C&I Demand Response Program.

Table 73. Large C&I Demand Response Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	0	0	0	0	0	0
Demand Reduction (MW)	0.00	57.50	57.50	57.50	57.50	230.00
Total TRC Costs*	\$596	\$1,472	\$1,472	\$1,472	\$1,472	\$6,482
Participant Costs*	\$0	\$876	\$876	\$876	\$876	\$3,503
Direct Utility Costs	\$596	\$1,763	\$1,763	\$1,763	\$1,763	\$7,650
Customer Incentives	\$0	\$1,168	\$1,168	\$1,168	\$1,168	\$4,670
EDC Labor, Materials, Supplies	\$76	\$76	\$76	\$76	\$76	\$380
CSP Labor, Materials, Supplies	\$438	\$438	\$438	\$438	\$438	\$2,188
CSP Marketing	\$82	\$82	\$82	\$82	\$82	\$412

* Per 2016 TRC Test Order guidelines, participant costs are assumed to be 75% of the participant incentive for demand response programs. Energy efficiency program tables show participant costs net of incentives. However, given the treatment of participant costs for demand response programs, the table provides gross participant costs. Therefore, for the purposes of this table, Total TRC Costs = Participant Costs + Direct Utility Costs – Customer Incentives.

The Large C&I Demand Response Program is projected to be cost-effective, with a TRC test ratio of 1.55. Table 74 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 74. Large C&I Demand Response Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$8,517
NPV Costs	\$5,510
Net Benefits	\$3,006
Benefit/Cost Ratio	1.55

3.5 Government/Nonprofit/Educational Sector Programs

The following sections summarize each of PPL Electric’s proposed GNE sector programs. Participation levels, savings, costs, and incentive ranges are estimates and may be subject to change.

The Plan presents the Efficient Equipment, Custom, and Demand Response programs as separate programs with separate cost and savings estimates for each Nonresidential customer sector (i.e., Small C&I, Large C&I, and GNE), as required by the Commission’s EE&C Plan Template. However, as was shown in Figure 3 in Section 3.1.2, PPL Electric will offer each of these programs to all Nonresidential customer sectors as unified nonresidential offerings.

For master-metered multifamily buildings in a nonresidential rate class that has low-income occupants, PPL Electric will provide LED bulbs in the living units at no cost. If the owners/managers of master-metered multifamily buildings desire energy efficiency improvements for common areas (e.g., vestibule, basement, hallways, exterior) or additional measures (e.g., appliance recycling, appliances, HVAC, water heaters) in the living units, those measures will be implemented through the applicable nonresidential program and subject to those programs’ eligibility requirements and incentive levels.

Consistent with the Pa PUC’s 2016 TRC Test Order, PPL Electric will apply the portion of savings attributable to low-income occupants in master-metered multifamily buildings toward the low-income savings compliance target. PPL Electric will work with the SWE and other Pennsylvania EDCs to determine how these savings will be shown on formal reports. As requested by most stakeholders, PPL Electric recommends showing the total savings for each project under the customer sector corresponding to the meter (i.e., Small C&I or Large C&I) or to GNE if the customer qualifies. PPL Electric will apply the portion of savings attributable to low-income occupants toward the low-income compliance target and will report these savings separately from other low-income savings (i.e., income-qualified customers in the residential rate class).

PPL Electric will also assign the costs for measures installed in master-metered multifamily buildings to the customer sector corresponding to the meter (i.e., Small C&I or Large C&I), or to GNE if the customer qualifies.²² PPL Electric does not expect the savings or costs associated with installing LED bulbs in tenant units of master-metered multifamily buildings to be significant (approximately less than 5,000 MWh/year in savings and less than \$1 million in costs).

²² GNE costs will be ultimately assigned to the appropriate customer rate class as described in Section 7.5.

Efficient Equipment Program - GNE

Program Description

Through the GNE Efficient Equipment Program, PPL Electric promotes the purchase and installation of a wide range of high-efficiency equipment, including lighting, HVAC and other measures specifically for GNE customers. The Company provides customers with financial incentives based on the measure installed and savings provided, which offset the higher purchase costs of energy efficient equipment. Additionally, PPL Electric offers information on the features and benefits of energy efficient equipment.

PPL Electric will begin utilizing a midstream lighting delivery channel to the program in Phase III, most likely in late PY8 or thereafter. PPL Electric designed the midstream lighting component to make choosing and procuring high-efficiency lighting more straightforward and faster than via typical downstream methods. In the midstream lighting approach, trade allies and customers may purchase LED lamps and bulbs directly from a participating and qualified midstream lighting distributor and receive an immediate rebate at the point of purchase. This approach has proven to increase customer and trade ally satisfaction; reduce administrative expenses; increase the volume of installed, high-efficiency lighting and socket upgrades, particularly for customers implementing routine lighting projects; and reduce the number of contractors and customers who use high-efficiency lighting products but fail to submit program applications.

The Nonresidential CSP will provide all nonresidential customers with synergies and a streamlined “one stop” experience. The Nonresidential CSP will manage and coordinate the GNE Efficient Equipment Program, maintaining a call and rebate processing center, recruiting and educating trade allies, and marketing the program to facilitate continued program participation and encourage customers to take a whole building approach or to implement multiple measures.

Objectives

The objectives of the GNE Efficient Equipment Program are to:

- Provide energy-saving opportunities to qualified customers;
- Increase the market penetration of high-efficiency technologies and building systems for customers by incentivizing high-efficiency and ENERGY STAR-rated appliances, lighting equipment, and HVAC systems;
- Engage trade allies to stock, promote, and provide high-efficiency technology options to customers;
- Promote other PPL Electric energy efficiency programs;
- Collect energy and operating data from customers, as required, to confirm customer and measure eligibility and to determine energy savings and cost-effectiveness;
- Obtain participation necessary to achieve approximately 32,000 MWh/year verified gross savings; and
- Achieve high customer and trade ally satisfaction with the program.

Target Market

The Efficient Equipment Program will be available to customers in a nonresidential rate class and any building or business type. Customers occupying rental property must have the owner's approval to participate. For the midstream lighting component, PPL Electric will target and leverage the midstream channel to deploy specific LED technologies and other potential equipment deemed cost-effective.

Implementation Strategy

The Nonresidential CSP will deliver the GNE Efficient Equipment Program, promoting the various energy efficiency options available to this customer segment through a range of marketing and outreach tactics. The program relies on projects being initiated by the customer, as well as on trade allies and the Nonresidential CSP. The Nonresidential CSP will leverage trade ally and manufacturer relationships to co-market energy efficient equipment and the value of program participation. The Nonresidential CSP will develop, update, and process rebate applications and payments. The EM&V CSP will provide evaluation services. PPL Electric staff will manage the Nonresidential CSP.

Key steps in this program include:

- Educating customers on energy efficiency opportunities and directing them to the program through marketing activities, the website, and/or direct contact with equipment distributors or equipment installation contractors/trade allies;
- Having customers complete program applications, or working with customers, equipment/appliance retailers, mid-stream distributors, and installation contractors to complete program applications and ensuring customers have required documentation to submit for processing;
- Reviewing pending and completed project documentation to verify the applicant is a PPL Electric customer and the completed project and installed equipment meets program eligibility criteria;
- When applicable, working with customers to confirm project preapproval before ordering energy efficiency equipment;
- Recruiting and developing an effective trade ally network;
- Processing completed projects and issuing rebates for qualified projects/equipment; and
- Verifying completed equipment/appliance installation for a sample of participants to confirm program integrity as a part of M&V.

Program Issues, Risks, and Risk Management Strategy

Table 75 presents market risks associated with the GNE Efficient Equipment Program, as well as strategies PPL Electric will use to manage each risk.

Table 75. GNE Efficient Equipment Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner does not prioritize energy efficiency	<ul style="list-style-type: none"> • Decision-makers choose to install cheaper, less efficient equipment with a shorter payback/IRR, resulting in lower savings • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<ul style="list-style-type: none"> • PPL Electric offers incentives and programs to reduce payback and IRR for business owners. • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient-equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails, and encourages businesses to plan for equipment replacement. • PPL Electric provides incentives for trade allies to stock, promote, and install efficient measures.
Customers unaware of the benefits of installing and properly maintaining energy efficient equipment	Customers do not properly maintain equipment and savings benefits erode over time	Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by customers participating in the GNE Efficient Equipment Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The GNE Efficient Equipment Program is an existing program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP has developed a transitional incentive strategy aiming to bridge incentives for customers whose participation in the program spans Plan II and Plan III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III:

- Projects on the Phase II waitlist will receive comparable incentives if completed and installed in early Phase III. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.

- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., placed in service) in Phase III will be eligible for the approved Phase II rebate, and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric's staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Leveraging trade ally and manufacturer relationships to co-market energy efficient equipment;
- Hosting webinars;
- Participating in trade shows and other outreach;
- Publishing marketing materials including charts, brochures, and case studies;
- Providing newsletters and coordinating with key market partners including trade associations and agencies;
- Advertising in local newspapers and other mass media;
- Using limited time offers, special promotions, and no-cost measures to promote energy efficiency;
- Offering trade ally incentives and rewards;
- Cross-promoting through other PPL Electric energy efficiency programs;
- Providing information and training for specific technologies directed towards niche markets;
- Incorporating GNE customers in area or territory focused promotions; and
- Working with distributors to promote and incent bulb and fixture purchases to capture program opportunities missed by other outreach methods.

Eligible Measures and Incentive Strategy

PPL Electric will offer rebates and incentives to qualified customers who submit completed applications and documentation of the efficiency measures installed. Customers will have the option to assign rebate payments to a third party.

For all measures offered through the GNE Efficient Equipment Program, PPL Electric will provide incentives in the range of \$0.03 to \$0.17 per annual kWh saved. Incentives may be capped at 50% to 100% of the total project costs (excluding internal labor) and are subject to an annual cap for each project and for each participating customer. The per-customer-site cap is defined as one building with one or more meters. A parent company cap will apply to a campus setting or multiple buildings (on the same property or in different locations) with a common owner.

The Company may distribute lighting measures to customers through the traditional rebate, direct discount (i.e., incentive paid to a trade ally), or midstream mechanism. Table 76 identifies PPL Electric's proposed list of program measures and minimum eligibility qualifications.

PPL Electric and the Nonresidential CSP will work with stakeholders, trade allies, and various agencies (e.g., CBOs) to create partnerships that can leverage additional incentives for GNE customers. Examples could include a “non-profit makeover,” where agencies, trade allies, equipment manufacturers, and others who provide incentives (or donate/discount products or services) that could be combined with PPL Electric’s incentives to help GNE customers implement energy efficiency measures in a GNE building, especially if the joint venture could result in more-comprehensive savings. PPL Electric will prepare case studies to share the benefits and encourage additional joint ventures.

Table 76. GNE Efficient Equipment Program Eligible Measures and Incentives

Measure	Eligibility Qualifications
HVAC	
ASHP (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
ASHP (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Air-Cooled DX (< 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Air-Cooled DX (> 5.4 tons)	Replacement or new installation of a Single Package or Split System heat pump (unitary air, water, or evaporative-cooled) exceeding IECC 2009
Electric Chiller	Exceed IECC 2009 energy efficiency requirements
Water Source or Geothermal Heat Pumps	Exceed IECC 2009 energy efficiency requirements
ECM Circulating Fan	Baseline: SP or PSC evaporator fan motors in an air handling unit
Ductless Heat Pump	SEER ≥ 16
Other HVAC Measure Listed in the TRM	Meets current TRM requirements
VFD	
VFD	Baseline: motor fan or pump without a VFD control
Food Service and Hospitality	
VSD Kitchen Exhaust Fan	Retrofit kitchen ventilation system with VSD, demand controls, and sensors
Low-Flow Pre-Rinse Sprayer (Food Service and Grocery)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 2.25 gpm food service; 2.15 gpm grocery applications
Low-Flow Pre-Rinse Sprayer (Time of Sale/Retail)	Replace existing pre-rinse sprayer; must have electric water heating; Baseline: 1.52 gpm
Steam Cooker	ENERGY STAR
Ice Maker	ENERGY STAR or CEE tier 2
Beverage/Snack Machine Control	Added to non-ENERGY STAR machines
Guest Room Occupancy Sensor	Replace guest rooms occupancy sensors with manual heating/cooling set-point and fan on/off/auto thermostat controls
Lighting	
LED Exit Sign	Replace incandescent or fluorescent exit signs
Occupancy Sensor	Wall, ceiling, or fixture mounted
T5	New T5 lamps and ballasts
T8 High Performance Fixtures	Retrofit fixture with qualified high performance T8 lamps and ballast (cee1.org list)

Section 3: Program Descriptions

Measure	Eligibility Qualifications
High Performance T8 Lamps	Retrofit standard T8 with qualified high performance T8 (cee1.org list)
T8 Reduced Wattage Fixtures	Retrofit fixture with qualified reduced wattage T8 lamps and ballast (cee1.org list)
Reduced Wattage T8 Lamp	Retrofit standard T8 with qualified reduced wattage T8 (cee1.org list)
High Bay T5, T8, LED	New T5, T8, LED fixture
De-lamp and install reflectors	Replace existing T5, T8 fixture with one or more lamps removed, must include electronic ballast and reflector
LED Lamps	Replace existing incandescent lamps or CFLs with ENERGY STAR or Lighting Facts LED
Metal Halide Pulse Start Lamps	Replace probe start (≤ 320 watts, > 320 watts)
LED Street Light/Area Light	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
LED Interior Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Induction Lighting	New fixtures or retrofit kits
Interior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007 and Building Area Method or Space-by-Space Method
Exterior Lighting - New Construction	Baseline: ASHRAE 90.1 - 2007; Baseline Exterior Lighting Power Densities
LED Wall Pack	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Reach-in Refrigeration Case Lighting	ENERGY STAR, Design Lights Consortium listed, or LM 79/LM 80 tested
Other Lighting and Controls Listed in the TRM	Listed in the TRM or PA Lighting Form Provides energy savings
Compressed Air	
VSD Air Compressor	Single VSD unit less than 75 hp
Cycling Refrigerated Thermal Mass Dryer	Baseline: non-cycling (e.g., continuous) air dryer with a capacity of 600 cfm or below. The replacement of desiccant, deliquescent, heat-of-compression, membrane, or other types of dryers does not qualify under this measure
Air-Entraining Air Nozzle	Replace non-air entraining air nozzle (open copper tube of 1/8-inch or 1/4-inch orifice diameter) with an energy efficient air-entraining air nozzle that uses less than 15 cfm at 100 psi for industrial applications
No-Loss Condensate Drain	Retrofit existing timed drained system with new No-loss Condensate Drains.
Air Tanks for Load/No Load Compressor	Minimum storage ratio of 4 gallons per CFM
Refrigeration	
High-Efficiency Refrigeration/Freezer Case	Must exceed federal efficiency standards
High-Efficiency Evaporator Fan Motor for Reach-In or Walk-in Refrigerated Case	Replace existing SP evaporator fan motors or PSC motors in reach-in or walk-in refrigerated display cases with an ECM
Evaporator Fan Controllers	Install in medium-temperature walk-in coolers and low-temperature walk-in freezers
FHPC	Baseline: refrigeration system without FHPC
Anti-Sweat Heater Control	Retrofit existing glass doors with uncontrolled heaters
Evaporator Coil Defrost Control	Retrofit existing walk-in coolers or freezers without defrost controls
VSD Refrigeration Compressor	Retrofit existing commercial refrigeration systems without VSD controls
Strip Curtains for Walk-In Coolers and Freezers	Install or retrofit strip curtains in commercial walk-in cooler and freezer doors
Night Cover for Display Case	Install on existing open-type refrigerated display cases, where covers are deployed during the facility's unoccupied hours

Measure	Eligibility Qualifications
Auto Closers	Retrofit doors not equipped with auto-closers, and assume the doors have strip curtain for walk-in coolers and freezers
Door Gaskets for Walk-in and Reach-in Coolers and Freezers	Replace worn-out gaskets with new, better fitting gaskets
Doors with Low or No Anti-Sweat Heat for Low Temperature Cases	Install a no-heat/low-heat clear glass door on an upright display case
Suction Pipe Insulation for Walk-In Coolers and Freezers	Insulate bare refrigeration suction pipes for walk-in coolers and freezers
Refrigerated Display Case Doors	Retrofit existing vertical open display cases with zero heat doors
Office Equipment	
ENERGY STAR Servers	Replace existing servers in a data center or server closet with new ENERGY STAR servers of similar computing capacity
PC Power Management	Any software that meets Pacific Northwest RTF Networked Computer Power Management Control Software Specifications
Smart Strip Plug Outlet	Replace existing standard strip plug outlet with smart strip plug
Agricultural	
Programmable Thermostat	Units controlling central air conditioner, electric heat, or resistance
VSD Controller for Dairy Vacuum Pumps	UL Listed, meets Institute of IEEE standards
Circulating Fans	Must be tested by AMCA
High Volume, Low Speed Fans	Must be tested by AMCA; >16 feet in diameter
Dairy Scroll Compressor Controller	VSD controllers for dairy vacuum pumps, UL listed and meeting IEEE harmonic control standards
Low-Pressure Irrigation System	Replace systems operating on 50% or less than existing system pressure
Livestock Waterer	Thermatically-controlled with 2-inches or more of factory-installed insulation
Heat Reclaimer	Meets current TRM requirements
Automatic Milker Take-Offs	Automatic milker take-offs that determine milking end time
Non-Electric High-Efficiency Central Heat (gas, oil, propane)	Meets current TRM requirements Max. of 250 units across all customer sectors/programs

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the recycling of older equipment, the installation of multiple measures, or a more comprehensive whole-facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee the program funding.

Program Start Date with Key Schedule Milestones

The GNE Efficient Equipment Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 77 lists the estimated key schedule milestones for the GNE Efficient Equipment Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 77. GNE Efficient Equipment Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch Phase III program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. As part of this process, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the GNE Efficient Equipment Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an evaluation plan and sampling protocol that fits the GNE Efficient Equipment Program. As part of this process, the EM&V CSP will review a sample of participant and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment may be included as a verification activity.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the GNE Efficient Equipment Program. PPL Electric staff will provide oversight and operational support to facilitate effective program deployment.

Estimated Participation

PPL Electric anticipates that approximately 7,500 GNE customers will participate in the Efficient Equipment Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 78 displays anticipated program benefits and costs by program year and in total. Approximately 6% of the Nonresidential sector budget is attributed to the GNE Efficient Equipment Program.

Table 78. GNE Efficient Equipment Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	6,404	6,404	6,404	6,404	6,404	32,018
Demand Reduction (MW)*	1.16	1.16	1.16	1.16	1.16	5.78
Total TRC Costs	\$420	\$420	\$1,220	\$1,220	\$420	\$3,698
Participant Costs	(\$402)	(\$338)	(\$1,138)	(\$1,138)	(\$338)	(\$3,354)
Direct Utility Costs	\$822	\$758	\$2,358	\$2,358	\$758	\$7,052
Customer Incentives	\$403	\$339	\$1,139	\$1,139	\$339	\$3,358
EDC Labor, Materials, Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, Supplies	\$299	\$299	\$1,099	\$1,099	\$299	\$3,093
CSP Marketing	\$45	\$45	\$45	\$45	\$45	\$226

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The GNE Efficient Equipment Program is projected to be cost-effective, with a TRC test ratio of 6.01. Table 79 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 75%.

Table 79. GNE Efficient Equipment Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$18,940
NPV Costs	\$3,153
Net Benefits	\$15,787
Benefit/Cost Ratio	6.01

Plans for Achieving Compliance with the Implementation Order

PPL Electric designed its Plan to achieve its GNE targets with Phase III transactions (i.e., projects that are implemented during Phase III) through GNE participation in nonresidential programs only (i.e., Efficient Equipment and Custom). PPL Electric is not projecting significant GNE carryover savings from Phase II.

Custom Program - GNE

Program Description

Through the GNE Custom Program, PPL Electric provides financial incentives to customers who install measures that are not offered in PPL Electric’s other commercial programs, including measures that are not addressed in the TRM. These measures may include new or replacement energy efficient equipment, retro-commissioning, repairs, equipment optimization, new construction projects, operational and process improvements, CHP projects, and behavioral changes that result in cost-effective energy efficiency savings. To qualify for financial incentives, eligible customers are required to provide documentation that their proposed efficiency upgrades pass the program cost-effectiveness threshold and technical criteria. The program also includes a continuous energy improvement component, under which the Nonresidential CSP works closely with customers (e.g., school districts) to identify ways to reduce their electricity usage through improved operations and maintenance and behavioral changes.

The Nonresidential CSP will support all sector-level program functions, including operating a customer call center, marketing, developing and maintaining an effective trade ally network, processing incentives to customers, and tracking activities. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Objectives

The objectives of the GNE Custom Program are to:

- Encourage PPL Electric GNE customers to take a comprehensive whole-facility approach to energy efficiency by installing high-efficiency custom measures or processes;
- Encourage qualifying equipment repairs, optimization, and operational or process changes that reduce electricity consumption;
- Increase customer awareness of the features and benefits of energy efficient equipment;
- Increase the market penetration of high-efficiency equipment;
- Support emerging technologies and non-typical efficiency solutions in cost-effective applications;
- Encourage advanced energy efficiency strategies required for certification by national market transformation programs such as LEED, Architecture 2030, or ENERGY STAR Buildings;
- Obtain participation necessary to achieve approximately 49,000 MWh/year verified gross savings; and
- Achieve high customer and trade ally satisfaction.

Target Market

The Custom Program will be available to customers in a nonresidential rate class and any building or business type. Customers occupying rental property must have the owner’s approval to participate.

Implementation Strategy

PPL Electric relies on the Nonresidential and EM&V CSPs and trade allies for implementation. The Nonresidential CSP will handle customer intake, routing, and application processing. The Nonresidential CSP will work directly with trade allies and customers to help identify, develop, and implement custom projects. The Nonresidential CSP will develop project scopes, analyze costs and potential energy savings of proposed projects, conduct field verification of completed projects, and help determine the reported energy savings from installed projects. The EM&V CSP will conduct independent evaluations to determine verified savings.

Program Issues, Risks, and Risk Management Strategy

Table 80 presents market risks associated with the GNE Custom Program, as well as strategies PPL Electric will use to manage each risk.

Table 80. GNE Custom Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customer or building owner does not prioritize energy efficiency	<ul style="list-style-type: none"> • Decision-makers choose to install cheaper, less efficient equipment with a shorter payback/IRR, resulting in lower savings • Owners are not informed about how their facility uses energy • Existing debt may limit funds to purchase new efficient equipment • Customers place priority on fluctuating commodity prices 	<ul style="list-style-type: none"> • PPL Electric offers incentives and programs to reduce payback and IRR for business owners. • Nonresidential CSP offers planning assistance to enhance energy savings. • Nonresidential CSP educates customers about the long-term benefits of energy efficiency, available incentives, and other programs that may help.
Customers typically replace equipment only upon failure	<ul style="list-style-type: none"> • Customers see no need to replace functioning equipment • Customers are not informed about the most efficient equipment available when the need to replace it is immediate. Some efficient-equipment may have a longer delivery time that would affect customer operations 	<ul style="list-style-type: none"> • Nonresidential CSP educates trade allies and customers about available energy efficient choices before equipment fails and encourages businesses to plan for equipment replacement. • PPL Electric provides incentives for trade allies to stock, promote, and install efficient measures.
Customers are unaware of the benefits of installing and properly maintaining energy-efficient equipment	Customers do not properly maintain equipment and savings benefits erode over time	Nonresidential CSP promotes the importance and value of equipment maintenance and training.

Anticipated Costs to Participating Customers

Costs incurred by GNE customers participating in the GNE Custom Program will vary based on the specific type of efficient equipment installed through the program.

Ramp-up Strategy

The GNE Custom Program is an existing program being carried forward from Phase II. The Nonresidential CSP will develop marketing material to facilitate the transition to Phase III. The Nonresidential CSP developed a transitional incentive strategy aiming to bridge incentives for customers whose participation spans Phase II and Phase III.

PPL Electric expects to implement the following transition plan between Phase II and Phase III.

- Projects on the Phase II waitlist that are completed and installed in early Phase III will receive comparable incentives. Comparable is defined as the Phase II rebate, up to \$0.10/annual kWh saved and subject to Phase III per project and/or per customer incentive caps. Projects must be completed by September 30, 2016 for most measures. PPL Electric will consider exceptions to that deadline on a case-by-case basis depending on the project details.
- Projects approved (i.e., funds reserved) in Phase II that are installed (i.e., placed in service) in Phase III will be eligible for the approved Phase II rebate, and will be accounted for as Phase III projects.

Marketing Strategy

PPL Electric's staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Communicating and providing access to program information on the EE&C program website;
- Promoting the program in newsletters;
- Advertising using newspaper, radio, direct mail, bill inserts, cross-program advertisements, commercial ads, and other mass media;
- Coordinating advertising opportunities with trade allies;
- Developing, publishing, and distributing program brochure and case studies;
- Conducting one-on-one marketing to GNE customers through trade allies, business accounts specialists, and Nonresidential CSP outreach;
- Targeting marketing to facility managers, building or process engineers, building owners and managers associations, HVAC contractors, energy services firms, architects and engineers, real estate developers, economic development organizations, customer advocacy groups, trade associations, and other trade allies to encourage the installation of new energy efficient technologies and adoption of best operating practices;
- Providing specific outreach to individual tenants as well as building owners and property managers in leased commercial buildings to encourage participation in the program;
- Targeting specific sectors identified as having a high level of unrealized energy efficiency potential; and
- Providing limited time offers.

Eligible Measures and Incentive Strategy

PPL Electric provides incentives following successful implementation of a cost-effective project. The Company offers performance-based incentives based on avoided or reduced kWh/year resulting from the project. Incentives may be capped at 50% to 100% of the total project costs (excluding internal labor) and are subject to an annual cap for each project and for each participating customer. The per-customer-site cap is defined as one building with one or more meters. A parent company cap will apply to a campus setting or multiple buildings (on the same property or in different locations) with a common owner.

Program measures, eligibility requirements, and incentives may change to reflect progress, changes in the TRM, changes in market conditions, or other factors. Examples of custom projects include chiller replacements, air compressor improvements, equipment control projects, and experimental technologies. Table 81 identifies PPL Electric’s proposed list of program measures, minimum eligibility qualifications, and incentive level ranges.

Table 81. GNE Custom Program Eligible Measures and Incentives

Measure	Eligibility Qualifications	Incentive Range
Custom GNE	Projects must meet a TRC test greater than 1.1. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% - 100% of the total project cost (excluding internal labor).	Average \$0.05 - \$0.14 per annual kWh saved
CHP	Projects must meet a TRC test greater than 1.25. Per project cap will range from \$250,000 to \$500,000 per customer site per year or \$1 million per parent company per year for customers with multiple sites. Incentive cannot exceed 50% of the total project cost (excluding internal labor).	Average \$0.0285 - \$0.1000 per annual kWh saved

All measures may not be available at all times. In some cases, PPL Electric may suspend a measure depending on popularity, pace of the program (savings and costs), free-ridership, evaluation requirements, complexity of the information required from customers, administrative requirements for the measure, etc. PPL Electric will review the program continually and may adjust available measures or eligibility qualifications to achieve program savings and cost budgets. PPL Electric may offer tiered incentives that encourage the installation of multiple measures or a more comprehensive whole facility approach.

Deadline for Rebate Applications

The program rebate application will state the deadline for its submission. The deadline will not exceed 180 days from the date that the measure was installed. For some measures, PPL Electric may allow customers to request project preapproval to lock-in the stipulated incentive level and guarantee program funding. For the GNE Custom Program, PPL Electric may require preapproval to allow time for

PPL Electric (or the Nonresidential CSP) to qualify the project, minimize free-ridership, screen for cost-effectiveness, determine the site-specific M&V plan, and conduct pre-metering if required.

Program Start Date with Key Schedule Milestones

The GNE Custom Program is currently offered in Phase II, and PPL Electric will facilitate the transition to the Phase III program. Table 82 lists the estimated key schedule milestones for the GNE Custom Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 82. GNE Custom Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/2016	Launch program
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric's Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE's Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and demand reduction. For the GNE Custom Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will develop an evaluation plan and sampling protocol that fits each program component (i.e., custom measures, PC power management, behavioral measures, and small business kit). The EM&V CSP will also develop site-specific EM&V plans for custom projects and other program components, as applicable, to meet Act 129 evaluation requirements.

As part of the EM&V activities, the EM&V CSP will review a sample of participant rebate applications and Nonresidential CSP records to verify the quantity, efficiency level, and qualifying equipment. On-site assessment will be included as a verification activity for the GNE Custom Program.

Administrative Requirements

The Nonresidential CSP will provide overall administrative and operational management of the GNE Custom Program. PPL Electric staff will provide oversight and operational support to facilitate effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 44 GNE customers will participate in the GNE Custom Program during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 83 displays anticipated program benefits and costs by program year and in total. Approximately 6% of the Nonresidential sector budget is attributed to the GNE Custom Program.

Table 83. GNE Custom Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	9,796	9,796	9,796	9,796	9,796	48,982
Demand Reduction (MW)*	1.66	1.66	1.66	1.66	1.66	8.29
Total TRC Costs	\$790	\$790	\$1,190	\$1,190	\$790	\$4,748
Participant Costs	(\$368)	(\$315)	(\$715)	(\$715)	(\$315)	(\$2,426)
Direct Utility Costs	\$1,158	\$1,104	\$1,904	\$1,904	\$1,104	\$7,175
Customer Incentives	\$581	\$527	\$927	\$927	\$527	\$3,490
EDC Labor, Materials, Supplies	\$75	\$75	\$75	\$75	\$75	\$375
CSP Labor, Materials, Supplies	\$457	\$457	\$857	\$857	\$457	\$3,085
CSP Marketing	\$45	\$45	\$45	\$45	\$45	\$226

* Demand reductions from energy efficiency programs do not count toward PPL Electric’s demand reduction compliance target, but they are used in the TRC calculation of benefits.

The GNE Custom Program is projected to be cost-effective, with a TRC test ratio of 6.04. Table 84 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 50%.

Table 84. GNE Custom Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$24,740
NPV Costs	\$4,093
Net Benefits	\$20,648
Benefit/Cost Ratio	6.04

Plans for Achieving Compliance with the Implementation Order

PPL Electric designed its Plan to achieve its GNE targets with Phase III transactions (i.e., projects that are implemented during Phase III) through GNE participation in nonresidential programs only (i.e., Efficient Equipment and Custom). PPL Electric is not projecting significant GNE carryover savings from Phase II.

Demand Response Program – GNE

Program Description

The GNE Demand Response Program is a load curtailment type program for nonresidential customers. Through the program, PPL Electric offers incentives to customers who reduce their demand during specific curtailment events. Participating customers must commit to providing a minimum of 100 kW of load reduction when called upon by the Demand Response CSP.

Participants in the Demand Response Program can also be enrolled in PJM’s ELRP. As required in the Pa PUC’s Implementation Order, PPL Electric designed the EE&C Plan to ensure that the cost to acquire peak demand reductions from customers who participate in PJM’s ELRP is no more than half the cost to acquire peak demand reductions from customers in the same rate class that are not participating in PJM’s ELRP. Because customers can change their enrollment status throughout Phase III and some customers may not participate in Act 129 demand response events in every program year, PPL Electric must wait until the conclusion of PY12 to demonstrate compliance with the acquisition cost requirement. The Demand Response CSP will manage and coordinate the GNE Demand Response Program, providing turnkey services.

In accordance with the Pa PUC Phase III Implementation Order, PPL Electric will call curtailment events as follows.

- Curtailment events shall be limited to the months of June through September.
- Curtailment events shall be called for the first six days that a peak hour of PJM’s day-ahead forecast²³ for the PJM RTO is greater than 96% of the PJM RTO summer peak demand forecast²⁴ for the months of June through September each program year.
- Each curtailment event shall last four consecutive hours.
- Each curtailment event shall be called such that it will occur during the day’s forecasted highest peak hour above 96% of PJM’s RTO summer peak demand forecast.
- Once six curtailment events have been called in a program year, the Demand Response Program shall be suspended for that program year.
- The MW reductions attributable to a four consecutive hour curtailment event will be based on the average MW reduction achieved during each hour of that event.

²³ PPL Electric will use the PJM seven-day load forecast, which is available online: <http://www.pjm.com/markets-and-operations/energy/real-time/7-day-load-forecast.aspx>. Unless the Pa PUC or SWE establishes procedures otherwise, PPL Electric expects to use the PJM day-ahead forecast posted at approximately noon the day before each operating day.

²⁴ PPL Electric will use Table B-1 of the annual PJM Load Forecast Report. The January 2015 report is available online: <http://www.pjm.com/~media/documents/reports/2015-load-forecast-report.ashx> and <http://www.pjm.com/~media/documents/reports/2015-load-report-data-xls.ashx>.

- Compliance will be determined based on the average MW reductions achieved from events called in the last four years of the program.

Based on these criteria, there could be zero to six curtailment events in each of the final four program years. There could be zero to 24 total events over the entire Phase III Demand Response Program across all of the applicable sectors (i.e., Small C&I, Large C&I, and GNE).

During Program Year 8, PPL Electric will determine if it (or the Demand Response CSP) will bid peak reductions from the Demand Response Program²⁵ and/or peak reductions from energy efficiency programs into the PJM Capacity Market. If PPL Electric or its Demand Response CSP bids into the PJM Capacity Market, PPL Electric will allocate the revenue received from successful bidding to the customer class from which the peak load reductions were acquired.

Objectives

The objectives of the GNE Demand Response Program are to:

- Cost-effectively deliver at least 92 MW of peak load reductions (all customer sectors combined). Peak load reductions will be determined based on the average of the MW reductions obtained from each event over the last four years of Phase III; and
- Achieve at least 85% of the peak demand reduction compliance target in every four-hour event. For PPL Electric, this requires a minimum of 78.2 MW in each event.

Target Market

The program will target nonresidential customers for this program who have the ability to curtail a minimum of 100 kW. The program will be available to customers in a nonresidential rate class and any building or business type.

Implementation Strategy

PPL Electric staff will manage the selected Demand Response CSP. The Demand Response CSP will provide turnkey services to deliver the program to customers, including marketing, customer recruitment, trade ally support, negotiating agreements with participants, providing customer care, determining when to call curtailment events and notifying participants accordingly, processing incentives, installing equipment (such as meters to measure customers' reduction in peak demand), and

²⁵ It is unclear whether PPL Electric is permitted to bid all of its peak reductions from its Act 129 Demand Response Program into PJM. Pages 143 to 144 of the Pa PUC's Phase III Implementation Order states: "We accept the Industrials' recommendation to require the EDCs to document in their EE&C Plans whether they intend to bid resources into the market. We note that as the peak demand reduction program does not permit dual participation in the Act 129 program and the PJM ELRP [PPL believes this is a typo since the Pa PUC does permit dual participation], neither the EDCs nor the customer will be permitted to bid Act 129 DR into the PJM ELRP program."

calculating peak load reductions. PPL Electric’s energy efficiency staff will provide overall strategic direction and program management. The EM&V CSP will provide evaluation services.

Key steps in this program include:

- Educating customers on demand response and recruiting them to the program;
- Having customers complete program applications/agreements and ensuring they have the necessary documentation and methods to reduce peak load;
- Verifying that the applicant is an eligible PPL Electric customer and the customer site meets program eligibility criteria;
- Monitoring PJM load forecasts to determine the applicable hours for each demand response event;
- Notifying participants of demand response events;
- Determining the peak reductions provided by each participant and the entire program as a whole for each demand response event and calculating the average reductions for all demand response events to date; and
- Processing participant incentives.

Program Issues, Risks, and Risk Management Strategy

Table 85 presents market risks associated with the GNE Demand Response Program, as well as strategies PPL Electric will use to manage each risk.

Table 85. GNE Demand Response Program Issues, Risks, and Risk Management Strategies

Program Issue	Risk	Risk Management Strategies
Customers do not understand or are not aware of the program	Customers do not participate, impacting PPL Electric’s ability to achieve its target	<ul style="list-style-type: none"> • PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early • Demand Response CSP increases the frequency of program education and outreach to customers. • Demand Response CSP provides information to help participants understand how various end uses impact their consumption.
Customer and building owner do not commonly prioritize demand response	Customer are reluctant to change business practices or impact operations	<ul style="list-style-type: none"> • PPL Electric provides adequate benefits for participation (e.g., incentives, energy management support). • Demand Response CSP ensures that contracts are for firm load reductions and include adequate incentives and penalties.

Program Issue	Risk	Risk Management Strategies
Customer may not be capable or willing to participate in every event	<ul style="list-style-type: none"> • Customers do not provide peak reductions as expected • Customers are not able to maintain comfort levels during cycling events • Evaluation uncertainty: the verification and calculation of peak reductions occur well after each event and results may differ from expected reductions. SWE’s verification is more than six months after the end of each program year 	<ul style="list-style-type: none"> • Demand Response CSP oversubscribes the number of participants and MWs in every event to provide a reasonable margin for uncertainties resulting from customers who do not provide their intended peak reductions or evaluation adjustments. • Demand Response CSP uses proven technologies that prevent large temperature swings.
The program budget is limited	Program budget (including incentives) is not sufficient to attract enough participation or customers drop out during Phase III	PPL Electric awards the Demand Response CSP contract early (before PY8 starts) to provide enough lead time to recruit participants early and confirm the budget and participation levels.
PJM changes rules or the demand response market changes	Rule changes at PJM could lead to a significant change (increase or decrease) in dual enrolled participants and/or the incentive levels required to attract Act 129 demand response participants	<ul style="list-style-type: none"> • Demand Response CSP monitors PJM markets. • Demand Response CSP maintains close relationships with actual and potential demand response participants. • PPL Electric revises EE&C Plan if required.
There is an unknown number of demand response events	Uncertain demand response budget due to unknown number of demand response events	<ul style="list-style-type: none"> • PPL Electric designs the program and Demand Response CSP contract to accommodate zero to six events per program year in the final four program years of Phase III. • PPL Electric budgets for the highest possible number of demand response events (24).

Anticipated Costs to Participating Customers

Customers may experience impacts to business operations, such as lost productivity and revenue. It is presumed that acceptance of the GNE Demand Response Program incentives will cover any such costs to participating customers.

Ramp-up Strategy

The Demand Response CSP will recruit participants from currently served markets and target current customers and other curtailment service providers, as well as recruit new customers. Recruiting will take place starting in PY8.

Marketing Strategy

PPL Electric’s staff will work with the Nonresidential CSP to develop and execute a marketing plan that captures sector-level economies-of-scale and employs targeted outreach where practical. The marketing strategy may include:

- Promoting the program to existing PPL Electric customers that currently participate in PJM’s ELRP; and
- Publishing marketing materials, including charts, brochures, and case studies.

Eligible Measures and Incentive Strategy

There are no specific measures prescribed by this program. Customers are asked to implement their own strategies, such as shifting or shedding load or using on-site generators. Those customers who achieve the contracted kW reduction qualify for an incentive to be distributed by the Demand Response CSP. The Demand Response CSP will negotiate incentives with individual customers, and PPL Electric will not know the incentive amounts given to each participant.

Deadline for Rebate Applications

There are no rebate applications for this program. The Demand Response CSP will pay customer incentives at the conclusion of each program year, upon verification of the peak demand reductions.

Program Start Date with Key Schedule Milestones

Table 86 lists the estimated key schedule milestones for the GNE Demand Response Program. PPL Electric program staff will lead implementation or provide management oversight of all tasks.

Table 86. GNE Demand Response Program Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to Pa PUC
06/01/16	Start to recruit participants
06/01/2017	Launch program (curtailment events can begin)
Annually by 01/15	EDCs submit semi-annual program report
Annually by 07/15	EDCs submit preliminary annual program report
Annually by 11/15	EDCs submit final annual program report
05/31/2021	Program ends

Evaluation, Measurement, and Verification

The EM&V requirements will be detailed in PPL Electric’s Evaluation Plan which will be submitted to the SWE for review. PPL Electric and its EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements and the SWE’s Evaluation Framework. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate demand reductions. The Demand Response CSP will determine peak reductions for each participant in accordance with one of the methods specified in the TRM. The EM&V CSP will review each method

selected to confirm it is appropriate for that participant. For the GNE Demand Response Program, PPL Electric anticipates conducting annual impact and process evaluations (activities vary by year).

The EM&V CSP will design the evaluation plan to verify demand reduction attributable to this program, and to verify the program met all regulatory requirements. The EM&V CSP will include all participants in any regression-based analysis used to confirm reported demand reduction.

Administrative Requirements

The Demand Response CSP will provide overall administrative and operational management of the GNE Demand Response Program. PPL Electric staff will provide oversight and operational support to facilitate effective program deployment.

Estimated Participation

PPL Electric anticipates approximately 150 GNE customers will participate in the Demand Response Program each year (i.e., PY9 – PY12) during Phase III. Actual quantities will vary, and PPL Electric will manage the program to stay within budget.

Estimated Program Budget, Savings, and Cost-Effectiveness

Table 87 displays anticipated program benefits and costs by program year and in total. Approximately 40% of the Demand Response budget is attributed to the GNE Demand Response Program.

Table 87. GNE Demand Response Program Costs and Benefits by Program Year (\$1,000)

	PY8	PY9	PY10	PY11	PY12	Total
Energy Savings (MWh/year)	0	0	0	0	0	0
Demand Reduction (MW)	0.00	46.00	46.00	46.00	46.00	184.00
Total TRC Costs*	\$477	\$1,177	\$1,177	\$1,177	\$1,177	\$5,186
Participant Costs*	\$0	\$701	\$701	\$701	\$701	\$2,802
Direct Utility Costs	\$477	\$1,411	\$1,411	\$1,411	\$1,411	\$6,120
Customer Incentives	\$0	\$934	\$934	\$934	\$934	\$3,736
EDC Labor, Materials, Supplies	\$61	\$61	\$61	\$61	\$61	\$304
CSP Labor, Materials, Supplies	\$350	\$350	\$350	\$350	\$350	\$1,750
CSP Marketing	\$66	\$66	\$66	\$66	\$66	\$330

*Per 2016 TRC Test Order guidelines, participant costs are assumed to be 75% of the participant incentive for demand response programs. Energy efficiency program tables show participant costs net of incentives. However, given the treatment of participant costs for demand response programs, the table provides gross participant costs. Therefore, for the purposes of this table, Total TRC Costs = Participant Costs + Direct Utility Costs – Customer Incentives.

The GNE Demand Response Program is projected to be cost-effective, with a TRC test ratio of 2.26. Table 88 shows net present value benefits and costs, net benefits, and the overall benefit/cost ratio. The NTG ratio for this program is estimated to be 100%.

Table 88. GNE Demand Response Program Cost-Effectiveness Results, TRC Test (\$1,000)

NPV Benefits	\$9,947
NPV Costs	\$4,408
Net Benefits	\$5,538
Benefit/Cost Ratio	2.26

4 Program Management and Implementation Strategies

4.1 Overview of EDC Management and Implementation Strategies

PPL Electric has a six-year history of successful EE&C Program management and implementation. The Company will utilize this knowledge and experience, lessons learned, best practices and relationships built to deliver programs that are effectively managed by its EE&C staff and implemented by qualified CSPs.

4.1.1 Services to Be Provided by EDCs, Consultants, Trade Allies, and CSPs

For its implementation strategy, PPL Electric relies on a broad range of CSPs, partners, trade allies, CBOs, and other entities engaged in energy efficiency to promote, deliver, and support the deployment of programs. PPL Electric's Plan identifies three primary CSPs to manage delivery of its residential, low-income, and nonresidential programs, as well as an additional CSP to manage delivery of its Demand Response Program. These program implementation CSPs will be responsible for the delivery of each program or programs defined within the relevant sector. Further, PPL Electric will use an additional CSP to provide EM&V services. PPL Electric will also implement a new energy efficiency tracking system. Figure 4 provides an overview of the activities inherent in program implementation, administration, and management and the roles and responsibilities of each program delivery participant.

In addition to CSPs, PPL Electric depends on trade allies and other market partners to engage customers, promote programs, evaluate projects, furnish and install energy efficient equipment, and provide ancillary energy efficiency services. PPL Electric will draw on the expertise available from trade allies, such as contractors and retailers, to support the local economy and allow customers to interact with the trade allies of their choice.

PPL Electric will competitively bid all CSP contracts using the RFP procedure approved by the Pa PUC in the Secretarial Letter dated July 14, 2015, at Docket No. M-2014-2424864.

Figure 4. Program Implementation Roles and Responsibilities

	Residential					Low Income		Small C&I		Large C&I		GNE		All C&I
	Appliance Recycling	Efficient Lighting	Energy Efficient Home	Student EE Education	Home Energy Education	Low-Income WRAP	EE Kits and Education	Efficient Equipment	Custom	Efficient Equipment	Custom	Efficient Equipment	Custom	Demand Response
Program Function														
Portfolio Planning	PPL Electric													
Research & Development														
Marketing Strategy														
CSP Management & Coordination														
Trade Ally Network Management	Residential CSP					Low-Income CSP		Nonresidential CSP					Demand Response CSP	
Marketing & Advertising														
Customer Intake & Routing														
Project Delivery														
Application Review & Approval														
Incentive Processing														
Customer Care	Implementation CSPs, PPL Electric, and EM&V CSP													
QA/QC														
Measurement & Verification														
Program Tracking	PPL Electric, using its Energy Efficiency Management Information System (“EEMIS”)													
Evaluation and Pa PUC Annual/Mid-Year Reports	EM&V CSP													

Conservation Service Providers

CSPs are individuals or firms registered with the Pa PUC that, pursuant to contract with EDCs, provide consultation, design, administration, management, and/or implementation services related to the delivery of EE&C programs. PPL Electric anticipates that CSPs will have a major role in delivering PPL Electric's Phase III programs.

As indicated in Figure 4, CSP roles involve the delivery of programs or functions within or across programs. PPL Electric will train its CSPs on reporting requirements, use of the Company's data management and tracking system (described in Section 5), customer service requirements, QA/QC standards, and protocols for addressing quality issues should they arise (described in Section 6). PPL Electric will require all CSPs to submit data and reports that include customer data and detailed information on installed measures and incentive transactions to support EM&V, tracking against the Plan budgets and goals, and reporting to the Commission.

To facilitate implementation of the Phase III EE&C portfolio, PPL Electric will engage three sector-specific CSPs: Residential, Low-Income, and Nonresidential. Each CSP will be responsible for implementation of all programs within their designated sector, including overseeing subcontractors. The Demand Response CSP will be responsible for implementing the Demand Response Program. An EM&V CSP will be responsible for independently evaluating the entire portfolio of EE&C programs and functions.

PPL Electric will hire other companies, not classified as CSPs, to perform functions such as providing/hosting the EEMIS, legal support, and marketing and advertising (overarching or specific campaigns other than the marketing/advertising provided by each program implementation CSP).

Trade Allies

Trade allies provide products and services directly to customers in support of PPL Electric's programs, but are not under contract to PPL Electric. Examples of the types of trade allies PPL Electric will use to deliver its programs include:

- **Lighting and other contractors, retailers, distributors/dealers and installers** who provide sales, equipment or building diagnostics, audits, maintenance, and installation services for energy efficient equipment, such as lighting, energy management systems and controls, HVAC, water heaters, insulation, commercial and industrial equipment, and appliances. These trade allies will inform customers about PPL Electric's applicable programs and rebates; provide essential information for customers to understand the costs and benefits of equipment or services; and encourage customers to take advantage of PPL Electric's programs.
- **Residential and commercial builders** who are builders, developers, remodelers, contractors, architects, engineers, or other market participants that design, develop, and build residential and commercial buildings. These trade allies will provide support delivery for the Energy Efficient Home Program and applicable C&I programs.
- **Technical engineering and energy services firms** that install energy efficiency projects for Small C&I, Large C&I, and GNE customers.

Market Partners

Market partners are independent market participants that may provide support or services to PPL Electric customers, typically in an effort to achieve mutually beneficial results or to serve mutual target populations. Market partners are not generally supported by Company funding and are not under contract to PPL Electric. For example, schools that engage with PPL Electric's Student Energy Efficient Education Program are considered market partners because they act as a conduit for reaching the school community with PPL Electric's program offering, but they do not receive a direct financial benefit from the program. Stakeholders and community based organizations are additional market partners.

4.1.2 Performance, Technology, Market, and Evaluation Risks and Risk Management Strategies

As described previously, the savings compliance targets set forth in the Implementation Order are higher than the Phase II goals and must be met within the same average cost cap. This means that the Phase III program acquisition cost must be approximately 30% less than that in Phase II. The low-income set-aside target is particularly challenging. Concurrent with an increase in the low-income target by 25%, the Implementation Order no longer allows low-income participation in general residential programs to count toward the Company's low-income goals. In addition, the Implementation Order's demand reduction targets and the specific rules regarding achievement of those targets present significant compliance uncertainty.

PPL Electric has identified the following market risks.

- **Market dynamics.** Since implementing its Phase II EE&C programs, consumer preferences, market practices, and participation levels have evolved. Customers have many competing demands on their time and resources. Reaching key energy decision makers in Nonresidential sectors can present a special challenge to PPL Electric and its CSPs, while rental properties—both residential and commercial—entail barriers associated with split incentives.
- **Economic conditions.** Although economic conditions have generally improved over the past few years, consumers remain cautious about investing in capital intensive projects. Meanwhile, the cost of acquiring energy savings has increased because much of the lowest-hanging fruit (particularly lighting) has been harvested, yet the PPL Electric savings acquisition cost must decrease by approximately 30%. In addition, electric rates remain relatively low, reducing consumers' incentive to make meaningful changes in energy usage. This challenge may be particularly significant for the demand reduction targets because, unlike when implementing energy efficiency measures, customers do not generally benefit from electricity bill reductions when they implement demand response. This is because very few customers have time-of-use rates that provide meaningful price differentials between on-peak and off-peak energy consumption. Therefore, most customers will only participate in PPL Electric's Demand Response Program if the Act 129 demand response incentives are sufficient; however, the

available incentives are constrained by the demand response budget cap determined by the SWE's Demand Response Market Potential Study and the Implementation Order.²⁶

- **Technological changes.** Changing building codes and new equipment standards tend to lower baseline energy use, thereby reducing the potential savings. This was demonstrated by measure savings in the SWE's Energy Efficiency Market Potential Study. Potential future adjustments to the TRM could further reduce or increase savings attributable to energy efficiency measures, increasing the uncertainty associated with the amount of savings from measures included in the EE&C Plan.²⁷ In addition, as new technologies emerge (such as smart thermostats, home/building energy management systems, and heat pump clothes dryers), it will be critical to quickly develop new TRM protocols that allow PPL Electric to claim the available energy savings.
- **PJM regulatory changes.** Rule changes within PJM can influence the likelihood that customers will subscribe to PPL Electric's Demand Response Program, and could change the amount of allowable incentives paid to Act 129 Demand Response participants,²⁸ or may result in limited or no PJM demand response programs. New regulations associated with the Clean Power Plan—or other new state or federal initiatives—could also require a greater emphasis on DSM or clean energy generation, thereby necessitating changes to the EE&C Plan.

To address these risks, PPL Electric designed its EE&C Plan to incorporate a range of mitigation measures, as outlined below.

- PPL Electric designed the Plan to exceed its regulatory energy-savings targets by a minimum of approximately 9% to allow for addressing evaluation and other uncertainties.
- The Company engaged stakeholders early and often during the Plan development process to identify key issues, solicit input, and obtain broad consensus for the Plan.
- PPL Electric issued RFPs for all CSP contracts a few months earlier than in previous phases. This helped provide earlier input for the design of programs, helped the Company confirm that savings and cost goals were realistic for each program and each customer sector (and the overall portfolio), and provided more time for detailed implementation planning so programs can

²⁶ The Implementation Order does not establish a funding cap for demand response. However, increasing demand response funding beyond the amount recommended increases the likelihood that demand response will not be cost-effective. It also reduces the budget for energy efficiency programs (because total funding for demand response and energy efficiency combined is capped), which makes it even more difficult to meet the energy reduction compliance targets.

²⁷ The TRM is likely to stay relatively constant for the entire five-year phase, although there may be mid-phase updates.

²⁸ The Implementation Order requires EDCs to demonstrate that the cost (including incentives) to acquire dual enrolled demand response participants (those who participate in PJM's ELRP and Act 129 demand response programs) must be half the cost to acquire single enrolled customers (those who only participate in Act 129 demand response programs). Implementation Order at page 44.

launch promptly, providing a transition from Phase II to Phase III, which is especially important because some CSPs have changed from those who implemented Phase II.

- PPL Electric will engage CSPs using performance-based contracts to ensure they have sufficient incentive to be accountable for achieving program success.
- PPL Electric identified a comprehensive range of strategies to reduce administrative and delivery costs by more than 30%, allowing it to maintain relatively high incentive levels that will continue to drive program participation.
- PPL Electric designed Phase III programs with flexible measures and incentive ranges, allowing the Company to control the pace of its EE&C programs, even if market conditions and consumer preferences change.
- PPL Electric will oversubscribe customers in its Demand Response Program to compensate for customers who do not achieve expected demand reductions in every event or who drop out of the program, and to allow the Company to address evaluation uncertainties while still meeting the requirement to achieve at least 85% of the compliance target in every demand response event.
- CSPs will emphasize comprehensive projects and measures for both residential and commercial customers through education and incentives.
- PPL Electric focused the EE&C Plan on proven and cost-effective measures with high savings, low program acquisition costs, and reasonable NTG ratios.
- PPL Electric will provide as much of the low-income savings as possible, within budget constraints, from direct install measures.
- The Company has already recognized the reduced availability of energy savings afforded by CFLs as a result of EISA and shifted its consumer lighting measure offerings to 100% LEDs in 2014.
- PPL Electric will remain focused on providing best in class EE&C programs, educating and engaging its customers in energy efficiency, and achieving high levels of customer satisfaction. This increases the likelihood of delivering the EE&C Plan within budget and achieving sufficient customer participation to meet savings targets.

4.1.3 Plans to Address Human Resource and Contractor Resource Constraints

PPL Electric's EE&C Plan balances program delivery needs and resource allocation across an experienced pool of internal staff, CSPs, trade allies, and market partners. PPL Electric's professional staff has extensive experience and a proven record of success managing program delivery CSPs and trade ally engagement. Over more than six years, PPL Electric has developed a robust network to provide the proposed services, and the EE&C Plan continues to emphasize ongoing contractor recruitment, outreach, and training to maintain continued program success. PPL Electric offers training so contractors are up-to-date on the latest technologies, program rules, and rebates being offered. Through its market research and engagement efforts, the Company frequently solicits feedback from its customers and contractors, especially those who meet face-to-face with customers and have provided valuable insights on gaps in contractor resources that can be quickly addressed and resolved.

The Company will assign program managers and support staff to oversee its CSPs and programs. PPL Electric frequently evaluates workloads and staffing needs and makes adjustments if necessary.

A description of PPL Electric’s EE&C Plan management structure and an organizational chart (Figure 5) are provided in Section 4.2.1.

4.1.4 Early Warning System

Ongoing monitoring of program activity—enabled by PPL Electric’s EEMIS, management oversight, CSPs’ tracking systems, customer and trade ally feedback, and the Company’s EM&V CSP—provide the means for promptly identifying programs that are not meeting their objectives. PPL Electric continually monitors program performance (such as savings and costs) and other objectives.

4.1.5 Implementation Schedule with Milestones

As of November 30, 2015, PPL Electric has issued competitive RFPs for all of its CSPs and for a new EEMIS, has selected its CSPs and the tracking system vendor, and is finalizing the CSP contracts for submittal to the Pa PUC for approval. The majority of Phase III programs are continuing from Phase II, and implementation will continue uninterrupted to facilitate the transition for customers and trade allies. Table 89 lists the key schedule milestones for the EE&C Plan.

Table 89. PPL Electric’s Phase III Implementation Schedule and Milestones

Schedule	Milestones
11/30/2015	Phase III EE&C Plan submitted to the Pa PUC
04/01/2016	Marketing can begin for EE&C programs (assuming Pa PUC approval)
06/01/2016	Launch of all Phase III energy efficiency programs
06/01/2017	Launch of Phase III demand reduction programs
Annually by 01/15	EDCs submit semi-annual program reports
Annually by 07/15	EDCs submit preliminary annual program reports
Annually by 11/15	EDCs submit final annual program reports
05/31/2021	Programs end

4.1.6 Stakeholder Engagement

PPL Electric is committed to obtaining stakeholder input and consensus, and keeping customers, stakeholders, and the general public informed about the results of the energy efficiency programs and progress toward Plan goals. During the development of the Phase III EE&C Plan, PPL Electric pursued opportunities to inform stakeholders of its progress and to solicit input. The Company held five formal stakeholder meetings and maintained ongoing communication with many parties, including other Pennsylvania EDCs; consumer and environmental advocates; chambers of commerce; state, local, and

private economic development organizations; CBOs; trade associations; government agencies; trade allies; market partners; potential CSPs; and customer groups.

In each stakeholder meeting, PPL Electric provided information on its requirements under the Commission’s Implementation Order, the Company’s approach to developing the Phase III programs, and the status updates on its progress with program design and development. These meetings were very well attended. PPL Electric carefully considered the feedback provided by stakeholders during program design and when establishing the savings and cost budgets for each customer sector. This collaborative process should increase the likelihood of EE&C Plan approval and success in implementing the portfolio.

Key information about stakeholder involvement, including meeting dates and topics discussed at each meeting, is summarized in Table 90.

Table 90. Stakeholder Coordination Activities and Participation

Meeting	Topics Discussed
March 16, 2015	<ul style="list-style-type: none"> • Summary of Phase III Tentative Implementation Order • Energy efficiency impacts of Phase III Tentative Implementation Order • Demand reduction impacts of Phase III Tentative Implementation Order • Q&A and next steps
July 9, 2015	<ul style="list-style-type: none"> • Summary of Phase II results through PY6 • Summary of Phase III Implementation Order • Guiding principles for Phase III EE&C Plan • Strategy and schedule for Phase III EE&C Plan • Stakeholder input • Q&A and next steps
August 18, 2015	<ul style="list-style-type: none"> • Phase III costs and savings by customer sector • Status update for Phase III EE&C program implementation bids • Low-income coordination with PPL Electric’s LIURP personnel and other agencies • Multifamily coordination across PPL Electric program CSPs • Specific measures desired • Q&A and next steps
September 28, 2015	<ul style="list-style-type: none"> • Status update of Phase III EE&C programs and implementation bids • Structure, format, and schedule for EE&C Plan • Q&A and next steps
October 29, 2015	<ul style="list-style-type: none"> • Phase III program savings and costs by end use • Phase III program measures and incentives (by sector) • Structure, format, and schedule for EE&C Plan • Q&A and next steps
November 6, 2015	<ul style="list-style-type: none"> • Teleconference to discuss master-metered multifamily buildings with low income occupants

PPL Electric intends to meet with stakeholders as needed, but not less than twice annually until May 31, 2021, to discuss progress, review results, and solicit input for possible EE&C Plan changes during Phase III. PPL Electric meets regularly with its CSPs and trade allies to review the Plan progress, consider new products and services, and/or identify opportunities to improve EE&C programs. The Company also provides Act 129 information in a dedicated stakeholder section on www.pplelectric.com, including its EE&C Plan and quarterly, semi-annual, and annual reports. Additionally, PPL Electric shares success stories with customers, trade allies, and the public by publishing and distributing case studies.

4.2 Executive Management Structure

4.2.1 Structures for Addressing Portfolio Strategy

PPL Electric staff will design, implement, and manage programs; oversee sector and cross-functional CSPs; and support the requirements of program delivery, such as marketing, advertising and customer education.

PPL Electric's **Manager, Energy Efficiency Evaluation & Performance** (title likely to change to **Manager Energy Efficiency/DSM Programs & Evaluation**) has overall responsibility for the development, implementation, operation, evaluation, reporting, and compliance of PPL Electric's Act 129 energy efficiency and demand response programs.

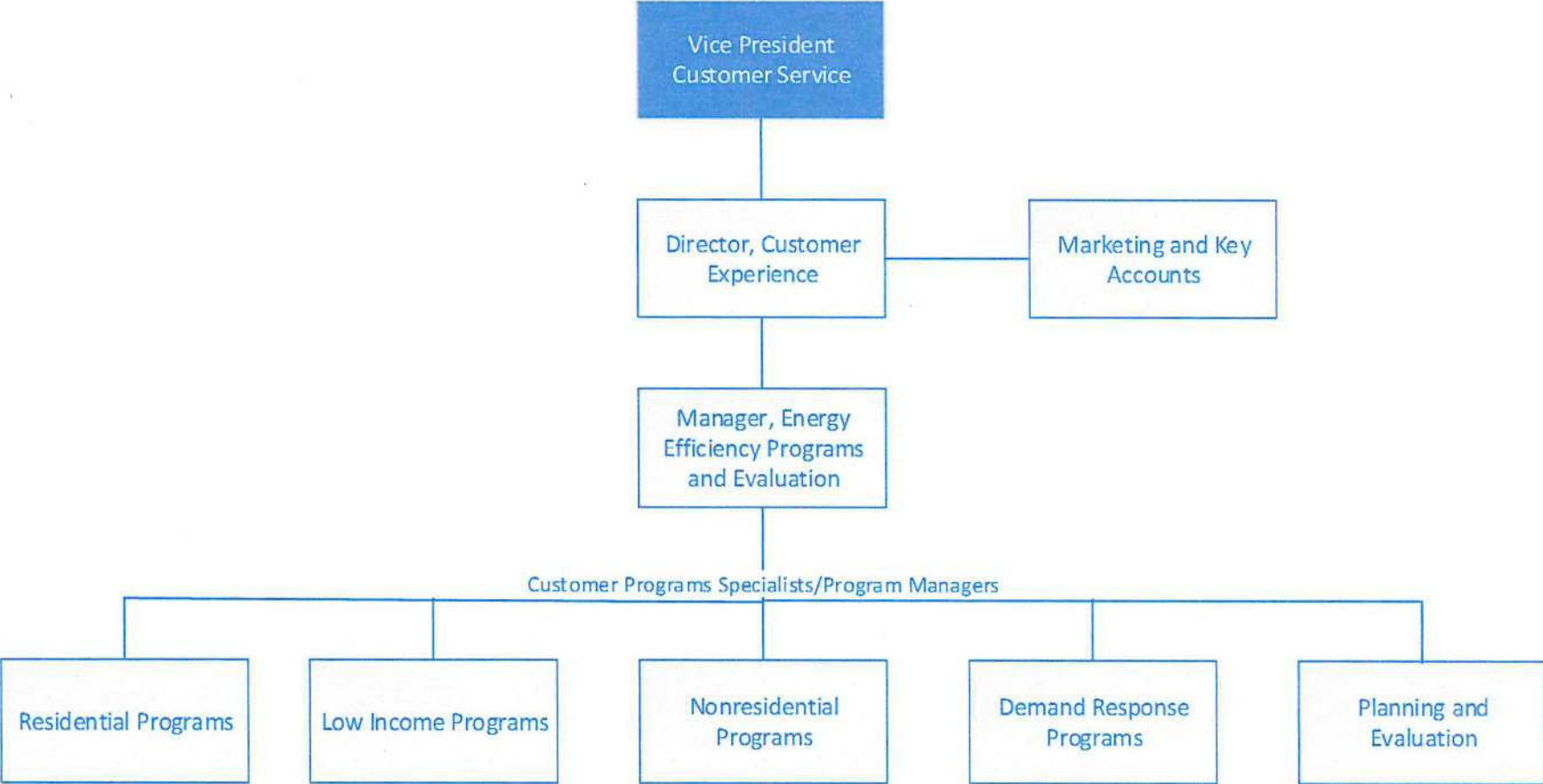
PPL Electric's **Director, Customer Experience** is responsible for marketing, advertising, market research, and the PPL Electric energy efficiency website.

PPL Electric's **Customer Program Specialist/Program Manager** staff manages each program and the respective program implementation CSPs. PPL Electric's, Key Account Managers support and help promote nonresidential programs.

PPL Electric also has staff responsible for EE&C program administration, operational and technical support, program planning, and evaluation.

Figure 5 summarizes PPL Electric's EE&C management structure.

Figure 5. PPL Electric EE&C Plan Management Structure



4.2.2 Approach to Overseeing the Performance of Subcontractors and Implementers

PPL Electric will implement a process to oversee its CSPs to confirm that they meet the requirements of their contracts, monitor program performance, and modify programs as needed (e.g., design, incentives, measures, marketing) to meet program objectives such as savings, costs, cost-effectiveness, and customer satisfaction. PPL Electric's oversight process includes the following elements:

- **Sector-level CSPs.** To reduce administrative costs and provide sufficient accountability for program objectives, PPL Electric will use three sector-level CSPs and a Demand Response CSP that will have overall responsibility for their sector and programs.
- **PPL Electric program management staff.** PPL Electric management and program staff are responsible for confirming that each program and sector meets its objectives. PPL Electric's management and staff will continually monitor program performance and will oversee and manage each sector-level CSP and each of their respective programs.
- **EM&V CSP.** PPL Electric's EM&V CSP will provide independent evaluations of programs to verify program impacts (such as savings, costs, and cost-effectiveness) and to determine if programs are operating effectively.

4.2.3 Administrative Budget

Administrative costs include all utility costs to develop, implement, and manage the Plan, excluding payments to customers/trade allies (rebates and incentives). Administrative costs consist of all expenses associated with PPL Electric labor and materials, CSP labor and material, marketing, QA/QC, EM&V, tracking systems, legal services, and the SWE.²⁹ The cost of goods and services provided to low-income and other customers at no cost is classified as administrative costs (not incentives), as directed by the Commission beginning in PY3 during Phase I.³⁰

4.3 Conservation Service Providers

4.3.1 Selected CSPs and Basis for Selection

PPL Electric issued RFPs for three sector-level implementation CSPs (i.e., Residential, Nonresidential, and Low-Income), one program-specific implementation CSP (i.e., Demand Response), and one CSP to provide EM&V. PPL Electric conducted its RFP processes in accordance with the procedures approved by the Commission. At the time this EE&C Plan was prepared, PPL Electric was finalizing the CSP contracts for submittal to the Pa PUC for approval.

²⁹ PPL Electric's share of the SWE is not subject to the Act 129 cost cap. See Implementation Order at page 95.

³⁰ This is currently the practice in Phase II, and PPL Electric believes the Pa PUC will continue this practice in Phase III.

4.3.2 Work and Measures Being Performed by CSPs

See Section 4.1.1 for a description of the work and measures being performed by CSPs. The CSPs' roles are also described within each individual program description in Section 3.

4.3.3 Pending RFPs

As of November 30, 2015, PPL Electric does not expect to issue additional RFPs.

5 Reporting and Tracking Systems

5.1 *Semi-annual and Annual Reports*

PPL Electric will provide semi-annual, annual, and *ad hoc* reports to the Commission and the SWE in accordance with the schedule, format, and content prescribed by the Commission/SWE. PPL Electric expects the schedule, format, and content to be comparable with Phase II reports.

5.2 *Project Management Tracking System*

5.2.1 Overview of Data Tracking System

PPL Electric will continue to use an EEMIS to record energy efficiency transactions and calculate reported savings. PPL Electric uses its corporate accounting system to track all energy efficiency and demand response program cost information, and uses EEMIS and its corporate business intelligence system for internal analysis and internal reporting on energy efficiency program activities. PPL Electric will modify these management and tracking systems as necessary to incorporate Phase III changes to programs and the Commission and SWE's reports, data extracts, and other requirements.

5.2.2 Software Format, Data Exchange Format, and Database Structure

PPL Electric's information system is based on a commercially available database platform. The system enables PPL Electric's program implementation CSPs to record and track all the data necessary to calculate energy savings impacts at all levels. Examples of data fields the system captures include:

- Participant contact information;
- Measure name;
- Measure type;
- Measure life, installed cost, and incremental cost;
- Number of measures installed;
- Building and space type;
- Space heating, cooling, and water heating fuel types;
- Rebate amount; and
- Existing conditions and equipment.

The information system will include the features and capabilities outlined below.

Database Structure

- Allows for multiple levels of data resolution (e.g., measure, project, premise, customer site, sector, program type, CSP).
- Allows users to navigate through layers of data (e.g., measures, project, program).
- Provides a place to store electronic documents related to program participants and other functions.

- Provides a straightforward interface for adding programs and program components.

Functionality

- Records energy efficiency transaction information such as customer account number, unique record ID, installation date of the measure, description and parameters of the measure (e.g., quantity, size, efficiency rating, end use), program name, customer, sector, and data required to calculate savings, as well as other required information about each transaction.
- Allows CSPs to file program transactions via a secure web link or other secure method.
- Calculates and allocates reported gross savings to the program, customer sector, and reporting period.
- Allows data extracts to be securely exported to external parties such as PPL Electric's EM&V CSP and the SWE.
- Is linked to PPL Electric's customer information system so that the Company can confirm participants' eligibility and track which customers participate in programs.

Data Quality Control

- Has intelligent use of drop-down lists, menus, and keyboard shortcuts.
- Allows data parameters (e.g., maximum/minimum) to be set for each data element to avoid erroneous entries.
- Checks for and alerts users to possible duplicate data entry before posting data.
- Provides an audit trail for all corrected data entry errors, deletions, etc.
- Tracks transactions and workflow.
- Generates standard and customized reports for PPL Electric's day-to-day portfolio analysis and management.

5.2.3 Mechanism for Access for Commission and Statewide EE&C Plan Evaluator

PPL Electric's information system provides accessibility to external parties through the following features.

- Is accessible through the Internet or direct links, as appropriate, and will be traceable, i.e., maintaining a log of users' access.
- Controls access via security rights assigned to each user or groups of users.
- Allows for appropriate security (e.g., releases, encryption) of customer data.
- Allows varying levels of security-controlled access by PPL Electric staff, program CSPs, and system administrators. Direct access (i.e., read-only) is not recommended for Commission personnel, the SWE, or PPL Electric's evaluator because they would need significant training to understand the system. PPL Electric provides data extracts to those parties instead.

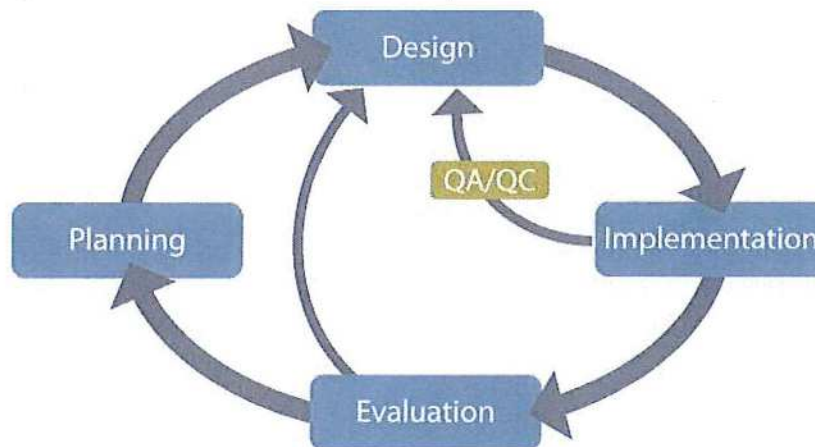
6 Quality Assurance and Evaluation, Measurement, and Verification

6.1 Quality Assurance/Quality Control

6.1.1 Approach to Quality Assurance and Quality Control

PPL Electric will use a continuous improvement process (“CIP”) as the framework for managing its Phase III portfolio. The basic principles of CIP, illustrated in Figure 6, is establishing effective QA/QC and EM&V procedures to track program activities, monitoring performance and progress toward targets, and taking corrective actions when warranted. The process integrates QA/QC procedures with implementation activities and allows feedback to flow back into the design and delivery processes. The CIP will consist of three essential elements, each discussed below: (1) activity tracking; (2) QA/QC; and (3) process and impact evaluations, which are described in the following sections.

Figure 6. PPL Electric’s Continuous Improvement Process



QA/QC is integral to the design and delivery of all programs in PPL Electric’s EE&C Plan. The QA procedures establish standards to follow during the planning and design phases to proactively promote consistency and avoid errors. QC activities and inspection points during the implementation and evaluation phases help guide the repair of errors and identification of areas for improvement. QA/QC procedures will improve performance. Activities and procedures that comprise QA and QC are described in greater detail below.

Quality Assurance

QA procedures comprise proactive activities that occur throughout the program lifecycle to align processes with objectives, avoid risk, and promote efficiency. QA at PPL Electric includes activities to confirm that the Company's program rules and requirements are documented and current, its CSPs and participating trade allies are properly licensed and trained and maintain high quality standards in all customer interactions, and all data captured is accurate and sufficient to allow for rigorous energy savings analysis. These activities include, but are not necessarily limited to, the following:

- Developing program logic models and process maps that document the goals, processes, and expected outcomes associated with key activities in each program;
- Implementing training protocols that describe training procedures and requirements for key program stakeholders, such as CSPs and trade allies;
- Applying rigorous screening and qualifying protocols to CSPs, trade allies, and field staff that interact directly with customers;
- Documenting data collection protocols, including data and customer information needed to track activities and calculate savings for each program; and
- Summarizing CSPs' gross energy savings calculation methods that are reported at the measure and/or project level to support consistency and accuracy across each program.

Quality Control

PPL Electric conducts QC to test and verify that program activities adhere to industry best practices and established QA procedures, and conform to performance expectations at the program and portfolio levels. In conducting QC activities, PPL Electric addresses operational procedures, data and records, and measure installation, as outlined below.

- Ongoing tracking of program activities and costs.
- Reviewing all data and records to confirm that the proper data are collected consistently, resources are allocated appropriately, and program performance can be measured accurately. For measure-based programs, this activity including verifying the collection of all information (including signatures, dates and project specific data) required to verify customer eligibility, calculate incentive payments, estimate and report energy savings and demand reduction, and confirm that recommended measures were installed.
- Conducting follow-up calls to participants to evaluate their satisfaction with the rendered services and to identify opportunities to improve the effectiveness of energy efficiency programs.
- Conducting post-installation inspections of an appropriately sized, random sample of all participants to confirm that program-reported measures were installed, installation followed best practice procedures, and measures function as expected.

6.1.2 Procedures for Measure and Project Installation Verification, Quality Assurance and Control, and Savings Documentation

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

Section 3 contains summary information about EM&V approaches specific to each program. The EM&V CSP will develop detailed EM&V plans describing all evaluation activities and sampling plans for the impact and process evaluations.

6.1.3 Process for Collecting and Addressing Feedback

Customers may submit suggestions, comments, and complaints by telephone, e-mail, and in writing. PPL Electric publishes telephone numbers, addresses, and an e-mail link on its website and on program applications. PPL Electric and CSPs are responsible for following up, in a timely manner, on all comments and complaints. The Company requires program CSPs to keep a log of complaints and resolutions, which they promptly provide to PPL Electric.

PPL Electric, in conjunction with the EM&V CSP, will implement an evaluation plan for each program. The EM&V CSP typically conducts ongoing customer and periodic trade ally surveys as part of the impact and process evaluations. The EM&V CSP will provide survey results and findings to PPL Electric on a regular basis.

PPL Electric and program implementation CSPs may also conduct customer satisfaction surveys, in addition to those conducted by the EM&V CSP.

6.2 Planned Market and Process Evaluations

The Pa PUC and SWE are responsible for conducting formal baseline studies and market potential studies. If requested by PPL Electric, the EM&V CSP may also conduct market potential or baseline studies.

The EM&V CSP will conduct process evaluations for the Phase III portfolio of programs. These process evaluations are a principal component of PPL Electric's CIP, allowing the Company to monitor the progress of individual programs and provide timely feedback to internal and external stakeholders. These evaluations also provide the necessary context for interpreting impact evaluation results. For each program in the Plan, the EM&V CSP will focus the process evaluation on improving program, operation, and delivery efficiency.

A primary objective of the process evaluations is to assess which program processes work well and which present challenges or may be improved. The EM&V CSP begins process evaluations by creating a logic model for each program, describing the program theory in terms of its goals, processes, outcomes, and metrics that enable assessment program performance relative to its objectives. The process evaluation will also involve an evaluability assessment, which includes reviewing the data collected to identify data elements required for evaluation. During the evaluability assessment, the EM&V CSP will also review data collection and tracking procedures to determine whether the CSP is collecting data necessary for verifying the program impacts on time, and to determine whether those data are in sufficient quantity and in the proper format.

PPL Electric can use the results of the process evaluation activities, benchmarking, and market effects studies to assess the programs' effectiveness in terms of market reach, measure adoption, and customer satisfaction. These activities and evaluations uncover opportunities to improve market penetration and identify barriers that may impede program participation and the adoption of efficiency measures.

The main sources of data for the process evaluation will be: program documentation reviews; logic models and evaluability assessments; interviews with internal PPL Electric program staff, as well as with CSPs and key market actors; secondary research; and participant and nonparticipant surveys. Key market actors will vary from program to program and may include various trade allies, such as equipment vendors, contractors, distributors, and retailers.

The EM&V CSP will survey program participants and, where necessary and specified in the program Evaluation Plan, will survey a comparable sample of nonparticipants. The EM&V CSP will design and execute survey sample plans to meet criteria for statistical confidence and precision specified in the Act 129 Evaluation Framework. For each program, the EM&V CSP may stratify samples, as appropriate, by customer sector, market segment, technology, geography, and project size (i.e., savings) so that samples are representative of the population. The EM&V CSP will implement the process evaluations in a manner that provides timely feedback to program planners and CSPs and that allows enough time to implement any recommended changes. Process evaluation activities will vary by program and by program year, as needed to provide desired information.

6.3 Strategy for Coordinating with the Statewide EE&C Plan Evaluator

PPL Electric expects that, for Phase III, the SWE will develop an Evaluation Framework, requirements for the Evaluation Plan, a process for creating savings protocols for new measures (not currently in the TRM), standard formats for semi-annual and annual reports, and standard formats for data requests and data extracts. The Implementation Order provides a reporting calendar with dates the reports and data must be provided to the SWE. PPL Electric and its EM&V CSP shall strive to adhere to those requirements or request approval for exceptions.

Impact evaluations will serve as the principal means of verifying the installation of EE&C measures and quantifying the resulting energy and demand impacts. Methods for measuring and verifying savings can vary by measure, according to the TRM and Evaluation Framework. Methods can also vary by program

and sector. The Evaluation Plan for each program outlines the evaluation methodology and sampling and verification plans. The EM&V CSP will submit these plans to the SWE for review and approval, and will adjust them where required by SWE. The EM&V CSP will update Evaluation Plans annually, if needed, and provide them to the SWE for review.

The SWE and the Commission's staff may call quarterly program evaluation group meetings for all EDCs and their evaluators. The SWE may also call *ad hoc* working group sessions to discuss TRM protocols, net savings approaches, or other Act 129 matters. PPL Electric and the EM&V CSP will attend these meetings to provide input and stay informed of the SWE's activities and decisions.

PPL Electric and its EM&V CSP may also contact the SWE with requests for clarification of TRM protocols, decisions, net savings approaches, or any other relevant matter. The communications between all parties will remain open and flexible.

7 Cost Recovery Mechanism

7.1 Total Annual Revenues as of December 31, 2006

Section 2806.1(g) of Act 129 requires that the total cost of any EE&C Plan cannot exceed 2% of the EDC's total annual revenue as of December 31, 2006. PPL Electric's total annual revenues for calendar year 2006 were approximately \$3 billion. Accordingly, the 2% cost cap established by Act 129 is approximately \$61.5 million. In its Implementation Order, the Commission stated that the 2% budgetary cap applies to the EDC's annual budget and not to the budget for the entire Phase III.³¹ In addition, the Commission determined that certain implementation costs recoverable under Act 129 are not subject to the 2% cost cap, including PPL Electric's share of the costs for the SWE.³²

7.2 Plan to Fund the EE&C Measures, Including Administrative Costs

PPL Electric will spend most of its \$312.5 million budget³³ to implement its EE&C Plan, including administrative costs. This budget also includes costs PPL Electric incurs to develop and modify its EE&C Plan. The Implementation Order states that EDCs should be permitted to recover the incremental cost incurred to design, create, and obtain Commission approval of a plan. Specifically, the Commission directed that recovery of Phase III costs that were incurred in Phase II may be deferred until Phase III recovery of rates becomes effective.³⁴ Accordingly, the Company proposes to amortize and recover those deferred costs ratably over the 60-month life of its Phase III EE&C Plan (i.e., June 1, 2016 through May 31, 2021). The amortization of those costs is included within the \$312.5 million budget.

7.3 Data Tables

The tables on the following pages provide cost data for each program/sector broken out by direct program costs, administrative costs, and total costs (Pa PUC tables 6A, 6B, and 6C). Cost-effectiveness calculations by program are provided in Section 8. Each table heading includes a reference to the corresponding table numbers provided in the EE&C Plan Template.

Tables in this section include:

- Table 91: **Pa PUC Table 6A** – Portfolio-Specific Assignment of EE&C Costs
- Table 92: **Pa PUC Table 6B** – Allocation of Common Costs to Applicable Customer Sector
- Table 93: **Pa PUC Table 6C** – Summary of Portfolio EE&C Costs

³¹ Implementation Order at page 135.

³² Implementation Order at page 95.

³³ \$307.5 million is the allowable budget under PPL Electric's Act 129 cost cap. In addition to this cost, PPL Electric expects to incur approximately \$5 million for its share of the SWE's cost, which are not subject to the cost cap.

³⁴ Implementation Order at page 114.

Table 91. Pa PUC Table 6A - Portfolio-Specific Assignment of EE&C Costs

Residential and Low Income Portfolio					
EE&C Program	Direct Cost Element (\$)				
	Incentives*	CSP Labor Materials & Supplies	CSP Marketing	EDC Labor and Materials	Total Costs
Appliance Recycling	\$2,361,919	\$8,116,488	\$1,027,175	\$296,400	\$11,801,982
Efficient Lighting	\$26,033,775	\$4,900,849	\$1,036,161	\$600,400	\$32,571,185
Energy Efficient Home	\$16,966,860	\$15,789,889	\$1,384,399	\$592,800	\$34,733,949
Student Energy Efficient Education	\$0	\$5,870,481	\$943,931	\$197,600	\$7,012,012
Home Energy Education	\$0	\$8,636,358	\$1,275,167	\$296,400	\$10,207,925
Low-Income WRAP	\$0	\$36,728,697	\$1,560,000	\$2,017,500	\$40,306,197
Energy Efficiency Kits and Education	\$0	\$5,911,831	\$762,000	\$225,000	\$6,898,831
Total	\$45,362,554	\$85,954,593	\$7,988,833	\$4,226,100	\$143,532,081

* Although low income programs are not classified as incentives, the \$47M in cost should be added to the incentive total when calculating total customer incentives

Small C&I Portfolio					
EE&C Program	Direct Cost Element (\$)				
	Incentives*	CSP Labor Materials & Supplies	CSP Marketing	EDC Labor and Materials	Total Costs
Small C&I Efficient Equipment	\$23,625,724	\$8,226,359	\$787,576	\$375,000	\$33,014,659
Small C&I Custom	\$16,798,863	\$5,792,932	\$686,606	\$375,000	\$23,653,401
Small C&I Demand Response	\$934,000	\$437,535	\$82,400	\$76,000	\$1,529,935
Small C&I Efficient Lighting ^[1]	\$3,560,666	\$205,173	\$0	\$0	\$3,765,839
Total	\$44,919,252	\$14,661,999	\$1,556,582	\$826,000	\$61,963,833

* Although low income programs are not classified as incentives, the \$47M in cost should be added to the incentive total when calculating total customer incentives

[1] To account for cross-sector sales, PPL Electric allocates a portion of costs and savings from the Efficient Lighting (Residential) program to the small commercial sector.

Large C&I Portfolio					
	Direct Cost Element (\$)				
EE&C Program	Incentives*	CSP Labor Materials & Supplies	CSP Marketing	EDC Labor and Materials	Total Costs
Large C&I Efficient Equipment	\$8,738,154	\$7,013,716	\$735,589	\$375,000	\$16,862,459
Large C&I Custom	\$9,583,311	\$8,085,339	\$981,054	\$375,000	\$19,024,704
Large C&I Demand Response	\$4,670,000	\$2,187,685	\$412,000	\$380,000	\$7,649,685
Total	\$22,991,465	\$17,286,740	\$2,128,643	\$1,130,000	\$43,536,848

* Although low income programs are not classified as incentives, the \$47M in cost should be added to the incentive total when calculating total customer incentives

GNE Portfolio					
	Direct Cost Element (\$)				
EE&C Program	Incentives*	CSP Labor Materials & Supplies	CSP Marketing	EDC Labor and Materials	Total Costs
GNE Efficient Equipment	\$3,358,102	\$3,093,363	\$225,588	\$375,000	\$7,052,052
GNE Custom	\$3,489,535	\$3,084,539	\$225,588	\$375,000	\$7,174,662
GNE Demand Response	\$3,736,000	\$1,750,150	\$329,600	\$304,000	\$6,119,750
Total	\$10,583,637	\$7,928,052	\$780,775	\$1,054,000	\$20,346,464

* Although low income programs are not classified as incentives, the \$47M in cost should be added to the incentive total when calculating total customer incentives

Total All Sectors							
	Direct Cost Element (\$)						
Total Portfolio	Incentives*	CSP Labor Materials & Supplies	CSP Marketing	EDC Labor and Materials	Total EDC Costs ¹	Total Participant Costs ²	Total TRC Costs (EDC + Participant)
EDC Costs	\$123,856,909	\$125,831,384	\$12,454,833	\$7,236,100	\$269,379,226	\$108,740,436	\$378,119,662
Common Costs		\$9,100,000	\$24,599,924	\$9,400,000	\$43,099,924		\$43,099,924
Total Costs	\$123,856,909	\$134,931,384	\$37,054,757	\$16,636,100	\$312,479,151	\$108,740,436	\$421,219,587

* Although low income programs are not classified as incentives, the \$47M in cost should be added to the incentive total when calculating total customer incentives

1 Common costs are not allocated to individual programs and, thus, are excluded from totals in this table.

2 Participant costs are net of incentives.

Table 92. Pa PUC Table 6B - Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost (\$)	Basis for Cost Allocation	Class Cost Allocation (\$)			
			Residential and Low-Income	Small C&I	Large C&I	GNE
Technical Support	\$2,601,833	% of direct program cost	\$1,386,320	\$598,485	\$420,507	\$196,520
Plan Development	\$3,393,695	% of direct program cost	\$1,808,244	\$780,633	\$548,488	\$256,331
EM&V	\$14,706,013	% of direct program cost	\$7,835,724	\$3,382,741	\$2,376,781	\$1,110,766
Marketing	\$10,633,579	% of direct program cost	\$5,665,832	\$2,445,982	\$1,718,596	\$803,169
Tracking System	\$4,524,927	% of direct program cost	\$2,410,992	\$1,040,843	\$731,317	\$341,774
Plan Management	\$5,656,159	% of direct program cost	\$3,013,740	\$1,301,054	\$914,147	\$427,218
KAMs	\$1,583,724	% of direct program cost	\$843,847	\$364,295	\$255,961	\$119,621
Totals	\$43,099,924		\$22,964,694	\$9,914,034	\$6,965,798	\$3,255,399

Table 93. Pa PUC Table 6C - Summary of Portfolio EE&C Costs

Portfolio	Total Direct Costs(\$)	Total Common Costs (\$)¹	Total of All Costs (\$)
Residential and Low-Income	\$143,532,081	\$22,964,694	\$166,496,775
Small C&I	\$61,963,833	\$9,914,034	\$71,877,867
Large C&I	\$43,536,848	\$6,965,798	\$50,502,646
GNE	\$20,346,464	\$3,255,399	\$23,601,863
Total	\$269,379,226	\$43,099,924	\$312,479,151

1 Due to rounding ratios used to allocate total common costs to sectors in the analysis, the total common cost for the phase varies from the actual estimate by less than \$10.

7.4 Tariffs and Cost Recovery Mechanism

Section 2806.1(k)(1) of Act 129 authorizes EDCs to recover the costs of their EE&C Plan through a reconcilable adjustment clause under Section 1307 of the Public Utility Code. In Appendix E of this EE&C Plan filing, PPL Electric has included its proposed *pro forma* tariff supplement to implement such a cost recovery mechanism—the ACR-III. Because all of PPL Electric’s proposed EE&C Plan programs will benefit both shopping and non-shopping customers, the Company designed its cost recovery mechanism to be non-bypassable. The ACR-III will be separately calculated for each of PPL Electric’s three major customer classes – Residential, Small C&I, and Large C&I. For residential customers, PPL Electric will apply the cost recovery mechanism as a cents per kWh component of the distribution charge. For Small C&I customers, the Company will apply the cost recovery mechanism as a cents per kWh charge as a separate line item on the customers’ bill. For Large C&I customers, PPL Electric will apply the cost recovery mechanism as a dollars per kW charge, as a separate line item on the customers’ bill, where the demand (i.e., kW) is a customer’s PJM peak load contribution (which may change yearly).

PPL Electric proposes to calculate the ACR-III on an annual basis based on the projected program costs that the Company anticipates it will incur during the applicable Phase III program year. PPL Electric proposes an annual reconciliation of the ACR-III for each of its three major customer classes. Specifically, each year PPL Electric will compare actual ACR-III revenues to actual expenses and will recover or refund any over/under collections in the next ACR-III application year.

In addition to the annual reconciliation, upon determination that a customer class’ Act 129 rate, if left unchanged, would result in a material over- or under-collection of Phase III Act 129 costs incurred or expected to be incurred during the current 12-month period, the Company, in its discretion, may file with the Commission for an interim revision of the ACR rate.

7.5 Cost Recovery Mechanism to Ensure Approved Measures Are Financed by Corresponding Customer Class

Section 2806.1(a)(11) of Act 129 requires that EE&C measures be paid for by the same customer class that receives the energy and conservation benefits of those measures. PPL Electric will directly assign costs to the customer class that received the benefits of the EE&C measures whenever those costs can be directly assigned. However, some costs, such as common costs/portfolio-level costs, relate to EE&C measures that are applicable to more than one customer class or that provide system-wide benefits. In Phases I and II, the Commission directed PPL Electric to allocate those costs, and general administrative costs, using reasonable and generally acceptable cost of service principles that are commonly utilized in base rate proceedings. As in Phases I and II, PPL Electric proposes to allocate such costs using an allocation factor. The allocation factor is a percentage equal to the actual EE&C costs directly assigned to each customer class divided by the actual EE&C costs assigned to all customer classes.

PPL Electric’s EE&C Plan provides estimated costs and savings for five customer sectors: Residential, Low-Income, Small C&I, Large C&I, and GNE. The GNE programs and measures are available to customers in more than one rate class (i.e., Residential, Small C&I, or Large C&I) who meet GNE

eligibility requirements (i.e., government, non-profit, or educational). The EE&C Plan does not have separate savings and cost budgets for each rate class within GNE. For cost recovery, the Company's ACR-III will assume that 60% of the estimated GNE costs will come from Small C&I participants and 40% from Large C&I participants, based on the actual results from Phases I and II. PPL Electric will assign actual GNE costs to the specific rate class of each GNE participant. The Company's reconciliation process will account for any differences between the estimated and actual GNE costs by customer class.

7.6 Phase III Cost Accounting

PPL Electric will account for Phase III costs separately from those incurred in prior phases using separate and distinct account numbers that break out charges by program, sector, and cost category (e.g., incentives, CSP costs, and payroll). The Company will use different account numbers for Phase III from those used in prior phases. Any costs associated with energy efficiency measures installed and operable on or before May 31, 2016 will be accounted for as Phase II costs. Any costs associated with energy efficiency measures installed and operable after May 31, 2016 will be accounted for as Phase III costs.

8 Cost-Effectiveness

8.1 Plan Cost-Effectiveness as Defined by the Total Resource Cost Test

The cost-effectiveness of the proposed portfolio was demonstrated in data presented in Section 3 and in Tables 7A through 7F in Section 8. For each program in the Plan, PPL Electric determined cost-effectiveness in accordance with the Commission's 2016 TRC Test Order.

PPL Electric began assessing the cost-effectiveness of each program in the Plan by creating a valuation of the net total resource benefits ("B_{TRC}") over the life of each conservation measure, for a maximum of 15 years as directed in the 2016 TRC Test Order. The Company also determined each measure's total incremental installed costs ("C_{TRC}"). PPL Electric deemed a measure (or program) as cost-effective if its B_{TRC} was positive or the benefit/cost ratio was at least 1.0, as shown by the following equations:

$$\begin{aligned} B_{TRC} - C_{TRC} &\geq 0 \\ \text{or} \\ B_{TRC} / C_{TRC} &\geq 1 \end{aligned}$$

The B_{TRC} data in this EE&C Plan are estimates based on the planning assumptions in this EE&C Plan. The Company will complete a cost-effectiveness evaluation using actual program results as part of its yearly evaluations.

Calculation of Avoided Costs of Supplying Electricity

PPL Electric calculated the avoided costs of delivered electricity for a 15-year planning horizon in three segments, in accordance with the procedure prescribed in the Commission's 2016 TRC Test Order, as follows:

- **Years 1-5 (June 2016-May 2021):** The Company will use PJM New York Mercantile Exchange ("NYMEX") PPL Zone Off-Peak and On-Peak Locational Marginal Price ("LMP") Swap futures as of August 27, 2015 through December 2016. PJM Western Hub Off-Peak and On-Peak LMP Swap futures are used from January 2017 through December 2018. PPL Electric adjusted the Western Hub values by assessing the 2016 ratio between PJM PPL Zone LMP Swap futures and Western Hub futures, and applying this ratio to the Western Hub values for 2017 and 2018. The Company used NYMEX Henry Hub Natural Gas Futures from 2019 through 2021, converted to electric prices using an on-peak and off-peak heat rate, and included basis adjustments and on-peak and off-peak spark price spreads.
- **Years 6-10 (June 2021-May 2026):** PPL Electric used NYMEX Henry Hub Natural Gas Futures as of August 27, 2015, converted to electric prices using an on-peak and off-peak heat rate. The Company included basis adjustments and on-peak and off-peak spark price spreads.
- **Years 11-15 (June 2026-May 2031):** PPL Electric used Middle Atlantic Natural Gas Prices for Electric Power from the Energy Information Administration Annual Energy Outlook, Energy Prices by Sector and Source, converted to electric prices using the on-peak and off-peak heat rate and including on-peak and off-peak spark price spreads.

The Company estimated avoided generation capacity costs using PJM base residual auction results through 2017 and 2018. After 2018, PPL Electric escalated prices using the Consumer Price Index from the Bureau of Labor Statistics (“BLS”). Avoided transmission and distribution costs are from the SWE Demand Response Potential study,³⁵ with the 2016 dollar escalated yearly using the BLS escalator. The assumptions used to calculate avoided costs are summarized by sector in Table 94.

Table 94. Main Assumptions Used in Avoided Costs and TRC Calculations

Discount Rates	Utility Discount Rate	7.63%
	Participant Discount Rate	10.00%
	Societal Discount Rate	7.63%
	TRC Discount Rate	7.63%
Line Losses ^[1]	Energy	
	Residential	8.75 %
	Commercial (Small C&I)	8.75 %
	Industrial (Large C&I)	4.20 %
	GNE	8.75 %
	Demand	
	Residential	8.75 %
	Commercial (Small C&I)	8.75 %
	Industrial (Large C&I)	4.20 %
	GNE	8.75 %
T&D Prices ^[2]	Average BLS Escalator	0.77%
	Transmission & Distribution (\$/kW-year 2016)	\$20.10
	Transmission Only (\$/kW-year 2016)	\$0.00

[1] Line losses are consistent with those provided in the 2016 TRM Order, at Docket No. M-2015-2469311 (Order Entered July 8, 2015).

[2] T&D prices are consistent with those provided on page 34 of the 2016 TRM Order. Avoided costs are provided in the SWE’s 2015 Demand Response Market Potential Study.

Table 95 shows PPL Electric’s calculated avoided costs of delivered electricity for a 15-year planning horizon.

³⁵ Table 2-13.

Table 95. Overall Avoided Costs (All Sectors)¹

Program Year	Electric Energy Avoided Costs (\$/kWh)					Capacity Avoided Costs (\$/kW-Year)		
	Winter		Summer		Yearly Average	Generation	T&D	Transmission Only
	On Peak	Off Peak	On Peak	Off Peak				
2017	\$0.0428	\$0.0300	\$0.0396	\$0.0213	\$0.0340	\$21.67	\$20.26	\$0.00
2018	\$0.0407	\$0.0291	\$0.0381	\$0.0206	\$0.0326	\$43.80	\$20.14	\$0.00
2019	\$0.0600	\$0.0380	\$0.0325	\$0.0203	\$0.0408	\$44.23	\$20.34	\$0.00
2020	\$0.0608	\$0.0428	\$0.0330	\$0.0207	\$0.0429	\$44.58	\$20.50	\$0.00
2021	\$0.0619	\$0.0437	\$0.0340	\$0.0214	\$0.0439	\$44.93	\$20.66	\$0.00
2022	\$0.0635	\$0.0450	\$0.0353	\$0.0225	\$0.0452	\$45.29	\$20.83	\$0.00
2023	\$0.0650	\$0.0462	\$0.0369	\$0.0238	\$0.0466	\$45.64	\$20.99	\$0.00
2024	\$0.0667	\$0.0475	\$0.0384	\$0.0250	\$0.0480	\$46.00	\$21.16	\$0.00
2025	\$0.0681	\$0.0487	\$0.0399	\$0.0262	\$0.0494	\$46.37	\$21.32	\$0.00
2026	\$0.0698	\$0.0499	\$0.0413	\$0.0273	\$0.0507	\$46.73	\$21.49	\$0.00
2027	\$0.0839	\$0.0613	\$0.0843	\$0.0617	\$0.0720	\$47.10	\$21.66	\$0.00
2028	\$0.0826	\$0.0603	\$0.0836	\$0.0611	\$0.0711	\$47.47	\$21.83	\$0.00
2029	\$0.0816	\$0.0595	\$0.0820	\$0.0598	\$0.0700	\$47.85	\$22.00	\$0.00
2030	\$0.0810	\$0.0590	\$0.0814	\$0.0593	\$0.0694	\$48.23	\$22.18	\$0.00
2031	\$0.0818	\$0.0597	\$0.0808	\$0.0589	\$0.0697	\$48.61	\$22.35	\$0.00
2032	\$0.0841	\$0.0615	\$0.0824	\$0.0602	\$0.0716	\$48.99	\$22.53	\$0.00
2033	\$0.0870	\$0.0639	\$0.0851	\$0.0623	\$0.0741	\$49.38	\$22.71	\$0.00
2034	\$0.0899	\$0.0661	\$0.0882	\$0.0648	\$0.0767	\$49.77	\$22.89	\$0.00
2035	\$0.0936	\$0.0691	\$0.0909	\$0.0669	\$0.0798	\$50.16	\$23.07	\$0.00
2036	\$0.0974	\$0.0722	\$0.0953	\$0.0705	\$0.0833	\$50.55	\$23.25	\$0.00
2037	\$0.1024	\$0.0762	\$0.0987	\$0.0732	\$0.0873	\$50.95	\$23.43	\$0.00
2038	\$0.1092	\$0.0816	\$0.1047	\$0.0780	\$0.0932	\$51.35	\$23.62	\$0.00
2039	\$0.1173	\$0.0881	\$0.1120	\$0.0838	\$0.1001	\$51.76	\$23.80	\$0.00

¹ In Phase II, T&D (\$/kWh) was included in the avoided energy cost; however, in Phase III, T&D (\$/kW) was included in the avoided capacity cost. Thus, relative to Phase II, Phase III avoided energy costs were lower and offset by higher avoided capacity costs. Additionally, given that the avoided generation capacity costs are pegged to PJM Reliability Pricing Model Base Residual Auction results, those costs are subject to volatility. As such, 2017 avoided generation capacity costs are less than subsequent years as provided in the 2017-2018 Base Residual Auction Report.

Measure Data

PPL Electric obtained estimates of savings, incremental cost, and measure life for this EE&C Plan primarily from the TRM, the Pennsylvania Incremental Cost Database, and the SWE's Energy Efficiency Market Potential Study. The Company compiled data for new measures not found in the TRM from secondary sources, including the California Database for Energy Efficiency Resources ("DEER").

Program Benefit Components

The benefits used in the TRC calculation include the full value of time and seasonally differentiated generation, transmission and distribution, and capacity costs, and they account for avoided line losses. To capture the full value of time and seasonal impacts of each program measure, PPL Electric adjusted hourly (8,760) system-avoided costs by the hourly load shape of the end user affected by the measure. The Company did not factor non-energy benefits, such as water savings, into the calculation because

these benefits were not readily quantifiable and assumed to be relatively minor.³⁶ These non-energy benefits would increase the benefit-cost ratio.

Program Cost Components

The cost component of the TRC analysis includes the incremental measure costs/participant costs and direct utility costs. Incremental measure costs are the expenses associated with installing energy efficiency measures and ongoing operation and maintenance costs, where applicable.

EDC costs consist of expenses associated with program development, delivery, and ongoing operation, and fit into the four categories outlined below.

1) EDC Labor, Material, and Supplies

- Costs to administer energy efficiency programs include (but are not limited to) PPL Electric's fully loaded incremental personnel costs, employee expenses, office supplies, and external legal costs.

2) Customer Incentives

- Rebates or other incentives paid to customers or trade allies (by PPL Electric or CSPs) for implementing measures.
- Incentive payments from PPL Electric to LED manufacturers and retailers who, in turn, discount those products at the point of sale.

3) CSP Labor, Materials, and Supplies

- Costs associated with performing program implementation tasks, including (but not limited to) lead intake, customer service, application processing, rebate application processing and problem resolution, equipment installation inspections, and individual program reporting. CSPs' marketing costs are segregated under *Marketing*.

4) Marketing

- EDC and CSP expenditures related to promotion of energy efficiency programs include, but are not limited to, the production of energy efficiency program literature, advertising, promotion and promotional items, displays, events, and communications. Advertising encompasses all forms of media such as direct mail, print, radio, and the Internet.
- Costs associated with training and educating the trade ally community, including training associated with delivering, marketing and promoting its programs and best practices training (e.g., quality installation training). This category also includes vendor recruitment and coordination costs. Trade allies include, but are not limited to, HVAC contractors, weatherization contractors, equipment and product dealers, installers, and C&I auditors. Trade allies may also include community groups and trade associations.

³⁶ 2016 TRC Test Order at page 15.

PPL Electric also categorizes costs as follows:

- **Direct Costs:** These costs are directly related and charged to a specific program. PPL Electric will assign costs directly to programs where possible.
- **Common Costs (also known as portfolio-level costs):** These costs are applicable to more than one customer class, are applicable to more than one program, or provide portfolio-wide benefits.
- **EDC Costs:** These costs (i.e., the four categories described above) are incurred by PPL Electric and include all direct and common costs. These costs are in the Plan budget and include the SWE costs that are not subject to the funding cap.
- **Participant Costs:** These costs are incurred by the customer, such as for the purchase and installation of efficient measures. Often, the participant cost is determined by subtracting Act 129 EE&C incentives from the incremental cost of the measure. PPL Electric only uses participant costs in the TRC evaluation.

8.2 Data Tables

The tables on the following pages provide TRC benefits data for each program and sector. Note that tables in this section are numbered sequentially, but table formats are based on those provided in the Commission EE&C Plan Template. Each table heading includes a reference to the corresponding table number provided in the EE&C Plan Template.

Tables in this section include:

Table 96: **Pa PUC Table 7A** – Gross TRC Benefits, Portfolio

Table 97: **Pa PUC Table 7B** – Net Benefits, Portfolio

Section 8: Cost -Effectiveness

Table 98: **Pa PUC Table 7C** – TRC Benefits, Residential and Low-Income Portfolio

Table 99: **Pa PUC Table 7D** – TRC Benefits, Small C&I Portfolio

Table 100: **Pa PUC Table 7E** – TRC Benefits, Large C&I Portfolio

Table 101: **Pa PUC Table 7F** – TRC Benefits, GNE Portfolio

Table 96. Pa PUC Table 7A – Gross TRC Benefits, Portfolio

Portfolio			Gross TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ^{1, 2}	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Appliance Recycling	PY8		\$2,113	\$4,497	\$38	\$36	\$351	\$147	1,775	14,056	13,120	105,351
	PY9		\$2,108	\$4,595	\$76	\$35	\$327	\$137	1,725	13,654	12,734	102,261
	PY10		\$2,345	\$4,693	\$74	\$34	\$404	\$169	1,676	13,263	12,358	99,257
	PY11		\$2,431	\$4,822	\$73	\$33	\$411	\$172	1,629	12,884	11,994	96,339
	PY12		\$2,806	\$6,423	\$93	\$43	\$536	\$225	2,073	16,167	15,316	121,822
Program Total ²		2.12	\$10,136	\$21,471	\$354	\$181	\$2,030	\$850	8,880	70,024	70,024	525,031
Efficient Lighting	PY8		\$39,189	\$56,539	\$383	\$357	\$2,809	\$850	17,643	247,001	95,752	1,340,530
	PY9		\$23,101	\$56,804	\$738	\$340	\$2,575	\$778	16,859	236,021	91,454	1,280,353
	PY10		\$11,909	\$41,964	\$526	\$242	\$2,280	\$683	11,894	166,513	64,245	899,432
	PY11		\$6,238	\$28,131	\$344	\$158	\$1,543	\$454	7,726	108,159	41,402	579,632
	PY12		\$120	\$0	\$0	\$0	\$0	\$0	0	0	0	0
Program Total ²		2.21	\$76,025	\$168,104	\$1,991	\$1,097	\$9,207	\$2,764	54,121	757,694	292,853	4,099,948
Energy Efficient Home	PY8		\$8,651	\$3,615	\$14	\$13	\$189	\$102	656	7,434	7,357	88,348
	PY9		\$9,773	\$5,152	\$37	\$17	\$244	\$134	848	9,391	9,941	119,029
	PY10		\$14,371	\$8,061	\$47	\$22	\$478	\$279	1,065	11,624	14,408	176,217
	PY11		\$18,804	\$11,503	\$54	\$25	\$688	\$425	1,220	13,241	19,454	244,650
	PY12		\$21,859	\$13,794	\$56	\$26	\$815	\$523	1,253	13,312	22,561	286,445
Program Total ²		0.57	\$61,507	\$34,865	\$209	\$103	\$2,414	\$1,463	5,043	55,003	73,721	914,689
Student Energy Efficient Education	PY8		\$1,243	\$2,348	\$15	\$14	\$138	\$59	673	7,407	5,180	56,977
	PY9		\$1,271	\$2,502	\$29	\$14	\$133	\$56	673	7,407	5,180	56,977
	PY10		\$1,390	\$2,657	\$30	\$14	\$169	\$72	673	7,407	5,180	56,977
	PY11		\$1,419	\$2,766	\$30	\$14	\$178	\$75	673	7,407	5,180	56,977
	PY12		\$1,689	\$1,815	\$19	\$9	\$115	\$49	426	4,682	3,274	36,014
Program Total ²		1.75	\$6,020	\$10,537	\$123	\$64	\$732	\$311	3,119	34,312	23,993	263,922
Home Energy Education	PY8		\$1,845	\$8,907	\$113	\$106	\$1,070	\$454	5,219	26,095	40,144	200,720
	PY9		\$1,759	\$9,727	\$234	\$108	\$1,051	\$446	5,341	26,704	41,080	205,400
	PY10		\$1,952	\$10,506	\$239	\$110	\$1,358	\$576	5,408	27,042	41,600	208,000
	PY11		\$2,253	\$12,255	\$273	\$126	\$1,617	\$686	6,132	30,661	47,168	235,840
	PY12		\$2,398	\$15,427	\$339	\$156	\$2,030	\$862	7,533	37,667	57,946	289,731
Program Total ²		5.52	\$8,759	\$48,338	\$1,198	\$605	\$7,125	\$3,025	29,634	148,168	227,938	1,139,691
Low-Income WRAP	PY8		\$7,225	\$5,047	\$31	\$29	\$283	\$117	1,452	17,111	10,501	123,102
	PY9		\$6,947	\$5,365	\$64	\$29	\$273	\$113	1,460	17,221	10,564	123,994
	PY10		\$9,796	\$5,676	\$65	\$30	\$350	\$145	1,462	17,247	10,578	124,179
	PY11		\$9,966	\$5,930	\$65	\$30	\$369	\$153	1,469	17,342	10,635	124,967
	PY12		\$6,372	\$4,495	\$47	\$22	\$288	\$129	1,041	11,363	8,268	91,839

Section 8: Cost -Effectiveness

Portfolio			Gross TRC Benefits by Program Per Year (\$1000)										
Program	Program Year	TRC	Program Costs (\$1,000) ^{1, 2}	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved		
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime	
Program Total ²			0.66	\$34,878	\$23,038	\$272	\$140	\$1,563	\$658	6,884	80,285	50,546	588,080
Energy Efficiency Kits and Education	PY8		\$1,262	\$2,538	\$21	\$20	\$190	\$77	988	8,857	7,074	60,368	
	PY9		\$1,408	\$2,918	\$47	\$22	\$198	\$81	1,075	9,637	7,696	65,681	
	PY10		\$1,500	\$3,225	\$49	\$23	\$261	\$107	1,119	10,026	8,007	68,333	
	PY11		\$1,596	\$3,481	\$52	\$24	\$284	\$116	1,162	10,416	8,318	70,989	
	PY12		\$1,133	\$2,341	\$37	\$17	\$223	\$98	832	5,795	6,506	45,620	
Program Total ²			2.10	\$5,989	\$12,569	\$207	\$105	\$1,157	\$479	5,177	44,731	37,601	310,990
Efficient Equipment (all C&I sectors)	PY8		\$24,990	\$41,845	\$287	\$202	\$2,112	\$693	13,228	186,349	73,625	1,028,414	
	PY9		\$25,339	\$44,366	\$585	\$203	\$2,047	\$670	13,352	188,164	74,224	1,037,157	
	PY10		\$33,065	\$56,660	\$723	\$251	\$3,127	\$1,017	16,335	229,327	90,602	1,261,538	
	PY11		\$32,449	\$57,853	\$719	\$253	\$3,199	\$1,026	16,126	226,212	89,074	1,238,682	
	PY12		\$30,452	\$59,211	\$715	\$251	\$3,227	\$1,040	15,916	223,004	88,016	1,222,493	
Program Total ²			1.77	\$125,794	\$222,502	\$3,028	\$1,159	\$13,712	\$4,447	74,957	1,053,055	415,541	5,788,284
Custom (all C&I sectors)	PY8		\$18,128	\$32,792	\$204	\$133	\$1,489	\$746	9,400	132,052	59,712	837,222	
	PY9		\$18,949	\$35,741	\$430	\$134	\$1,497	\$755	9,813	136,697	62,629	871,132	
	PY10		\$25,406	\$53,484	\$615	\$174	\$2,664	\$1,367	13,901	193,608	90,046	1,255,446	
	PY11		\$25,497	\$56,438	\$630	\$180	\$2,812	\$1,440	14,133	196,972	91,440	1,275,558	
	PY12		\$24,497	\$58,571	\$635	\$181	\$2,875	\$1,472	14,133	196,972	91,440	1,275,558	
Program Total ²			2.09	\$96,369	\$201,081	\$2,514	\$802	\$11,337	\$5,780	61,380	856,302	395,268	5,514,917
Demand Response (all C&I sectors)	PY8		\$1,192	\$0	\$0	\$0	\$0	\$0	0	0	0	0	
	PY9		\$2,943	\$6,195	\$5,037	\$1,158	\$0	\$0	115,000	115,000	0	0	
	PY10		\$2,943	\$6,256	\$5,087	\$1,170	\$0	\$0	115,000	115,000	0	0	
	PY11		\$2,943	\$6,306	\$5,127	\$1,179	\$0	\$0	115,000	115,000	0	0	
	PY12		\$2,943	\$6,355	\$5,167	\$1,188	\$0	\$0	115,000	115,000	0	0	
Program Total ²			1.90	\$11,021	\$20,950	\$20,418	\$4,695	\$0	\$0	460,000	460,000	0	0
Portfolio Total			1.75	\$436,498	\$763,456	\$30,315	\$8,951	\$49,276	\$19,777	709,194	3,559,575	1,582,984	19,145,553

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

² The TRC ratio will reflect the lifetime TRC, not an annual TRC ratio. Total program costs and benefits are discounted back to PY8.

Table 97. Pa PUC Table 7B - Net Benefits, Portfolio

Portfolio			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000)^{1, 2}	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Appliance Recycling	PY8		\$2,113	\$2,698	\$23	\$22	\$211	\$88	1,065.28	8,433.33	7,872	63,210
	PY9		\$2,108	\$2,757	\$45	\$21	\$196	\$82	1,035.16	8,192.34	7,640	61,357
	PY10		\$2,345	\$2,816	\$44	\$20	\$242	\$101	1,005.87	7,958.01	7,415	59,554
	PY11		\$2,431	\$2,893	\$44	\$20	\$247	\$103	977.41	7,730.37	7,196	57,803
	PY12		\$2,806	\$3,854	\$56	\$26	\$322	\$135	1,244.05	9,700.17	9,189	73,093
Program Total ²		1.27	\$10,136	\$12,883	\$212	\$109	\$1,218	\$510	5,327.77	42,014.23	39,313	315,018
Efficient Lighting	PY8		\$29,799	\$42,404	\$287	\$268	\$2,107	\$637	13,232.20	185,250.82	71,814	1,005,398
	PY9		\$17,697	\$42,603	\$554	\$255	\$1,931	\$584	12,643.96	177,015.41	68,590	960,265
	PY10		\$9,385	\$31,473	\$395	\$181	\$1,710	\$512	8,920.36	124,885.10	48,184	674,574
	PY11		\$5,101	\$21,099	\$258	\$119	\$1,157	\$340	5,794.25	81,119.47	31,052	434,724
	PY12		\$120	\$0	\$0	\$0	\$0	\$0	0.00	0.00	0.00	0.00
Program Total ²		2.15	\$58,524	\$126,078	\$1,494	\$823	\$6,906	\$2,073	40,590.77	568,270.80	219,640	3,074,961
Energy Efficient Home	PY8		\$6,814	\$2,350	\$9	\$9	\$123	\$66	426.24	4,832.26	4,782	57,426
	PY9		\$7,439	\$3,349	\$24	\$11	\$159	\$87	551.24	6,104.40	6,461	77,369
	PY10		\$10,586	\$5,240	\$31	\$14	\$311	\$182	692.51	7,555.63	9,365	114,541
	PY11		\$13,651	\$7,477	\$35	\$16	\$447	\$277	793.12	8,606.78	12,645	159,023
	PY12		\$15,475	\$8,966	\$37	\$17	\$530	\$340	814.55	8,653.04	14,665	186,189
Program Total ²		0.50	\$45,345	\$22,662	\$136	\$67	\$1,569	\$951	3,277.67	35,752.12	47,919	594,548
Student Energy Efficient Education (NET Single Year)	PY8		\$1,243	\$2,348	\$15	\$14	\$138	\$59	673.40	7,407.44	5,180	56,977
	PY9		\$1,271	\$2,502	\$29	\$14	\$133	\$56	673.40	7,407.44	5,180	56,977
	PY10		\$1,390	\$2,657	\$30	\$14	\$169	\$72	673.40	7,407.44	5,180	56,977
	PY11		\$1,419	\$2,766	\$30	\$14	\$178	\$75	673.40	7,407.44	5,180	56,977
	PY12		\$1,689	\$1,815	\$19	\$9	\$115	\$49	425.64	4,682.05	3,274	36,014
Program Total ²		1.75	\$6,020	\$10,537	\$123	\$64	\$732	\$311	3,119.25	34,311.80	23,993	263,922
Home Energy Education (NET Single Year)	PY8		\$1,845	\$8,907	\$113	\$106	\$1,070	\$454	5,219.02	26,095.11	40,144	200,720
	PY9		\$1,759	\$9,727	\$234	\$108	\$1,051	\$446	5,340.71	26,703.54	41,080	205,400
	PY10		\$1,952	\$10,506	\$239	\$110	\$1,358	\$576	5,408.31	27,041.56	41,600	208,000
	PY11		\$2,253	\$12,255	\$273	\$126	\$1,617	\$686	6,132.19	30,660.97	47,168	235,840
	PY12		\$2,398	\$15,427	\$339	\$156	\$2,030	\$862	7,533.44	37,667.22	57,946	289,731
Program Total ²		5.52	\$8,759	\$48,338	\$1,198	\$605	\$7,125	\$3,025	29,633.68	148,168.39	227,938	1,139,691
Low-Income WRAP	PY8		\$7,225	\$5,047	\$31	\$29	\$283	\$117	1,451.96	17,111.45	10,501	123,102
	PY9		\$6,947	\$5,365	\$64	\$29	\$273	\$113	1,459.90	17,221.42	10,564	123,994
	PY10		\$9,796	\$5,676	\$65	\$30	\$350	\$145	1,461.77	17,246.80	10,578	124,179
	PY11		\$9,966	\$5,930	\$65	\$30	\$369	\$153	1,468.72	17,341.91	10,635	124,967
	PY12		\$6,372	\$4,495	\$47	\$22	\$288	\$129	1,041.47	11,362.99	8,268	91,839
Program Total ²		0.66	\$34,878	\$23,038	\$272	\$140	\$1,563	\$658	6,883.83	80,284.57	50,546	588,080

Section 8: Cost -Effectiveness

Portfolio			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ^{1, 2}	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Energy Efficiency Kits and Education	PY8		\$1,262	\$2,538	\$21	\$20	\$190	\$77	988.42	8,857.40	7,074	60,368
	PY9		\$1,408	\$2,918	\$47	\$22	\$198	\$81	1,075.43	9,637.09	7,696	65,681
	PY10		\$1,500	\$3,225	\$49	\$23	\$261	\$107	1,118.85	10,026.16	8,007	68,333
	PY11		\$1,596	\$3,481	\$52	\$24	\$284	\$116	1,162.34	10,415.92	8,318	70,989
	PY12		\$1,133	\$2,341	\$37	\$17	\$223	\$98	832.24	5,794.50	6,506	45,620
Program Total ²		2.10	\$5,989	\$12,569	\$207	\$105	\$1,157	\$479	5,177.29	44,731.08	37,601	310,990
Efficient Equipment (all C&I sectors)	PY8		\$19,538	\$31,384	\$215	\$151	\$1,584	\$520	9,921.37	139,761.45	55,218	771,311
	PY9		\$19,804	\$33,274	\$439	\$152	\$1,535	\$503	10,013.78	141,122.98	55,668	777,868
	PY10		\$26,213	\$42,495	\$542	\$188	\$2,345	\$762	12,250.90	171,994.88	67,952	946,154
	PY11		\$25,736	\$43,390	\$539	\$190	\$2,399	\$770	12,094.68	169,659.09	66,806	929,011
	PY12		\$23,732	\$44,408	\$536	\$188	\$2,420	\$780	11,936.97	167,253.15	66,012	916,870
Program Total ²		1.69	\$98,893	\$166,876	\$2,271	\$870	\$10,284	\$3,335	56,217.71	789,791.54	311,656	4,341,213
Custom (all C&I sectors)	PY8		\$10,544	\$16,396	\$102	\$67	\$745	\$373	4,699.97	66,026.10	29,856	418,611
	PY9		\$11,008	\$17,870	\$215	\$67	\$748	\$377	4,906.72	68,348.74	31,315	435,566
	PY10		\$15,184	\$26,742	\$307	\$87	\$1,332	\$684	6,950.57	96,804.07	45,023	627,723
	PY11		\$15,246	\$28,219	\$315	\$90	\$1,406	\$720	7,066.36	98,486.14	45,720	637,779
	PY12		\$14,246	\$29,285	\$318	\$90	\$1,437	\$736	7,066.36	98,486.14	45,720	637,779
Program Total ²		1.77	\$56,724	\$100,540	\$1,257	\$401	\$5,668	\$2,890	30,689.98	428,151.21	197,634	2,757,458
Demand Response (all C&I sectors)	PY8		\$1,192	\$0	\$0	\$0	\$0	\$0	0.00	0.00	0.00	0.00
	PY9		\$2,943	\$6,195	\$5,037	\$1,158	\$0	\$0	114,999.99	114,999.99	0.00	0.00
	PY10		\$2,943	\$6,256	\$5,087	\$1,170	\$0	\$0	114,999.99	114,999.99	0.00	0.00
	PY11		\$2,943	\$6,306	\$5,127	\$1,179	\$0	\$0	114,999.99	114,999.99	0.00	0.00
	PY12		\$2,943	\$6,355	\$5,167	\$1,188	\$0	\$0	114,999.99	114,999.99	0.00	0.00
Program Total ²		1.90	\$11,021	\$20,950	\$20,418	\$4,695	\$0	\$0	459,999.98	459,999.98	0.00	0.00
Portfolio Total		1.62	\$336,289	\$544,473	\$27,589	\$7,877	\$36,222	\$14,232	640,917.93	2,631,475.73	1,156,240	13,385,883

¹ Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

² The TRC ratio will reflect the lifetime TRC, not an annual TRC ratio. Total program costs and benefits are discounted back to PY8.

Table 98. Pa PUC Table 7C - TRC Benefits, Residential and Low-Income Portfolio

Residential and Low-Income			Gross TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Appliance Recycling	PY8	2.13	\$2,113	\$4,497	\$38	\$36	\$351	\$147	1,775	14,056	13,120	105,351
	PY9	2.18	\$2,108	\$4,595	\$76	\$35	\$327	\$137	1,725	13,654	12,734	102,261
	PY10	2.00	\$2,345	\$4,693	\$74	\$34	\$404	\$169	1,676	13,263	12,358	99,257
	PY11	1.98	\$2,431	\$4,822	\$73	\$33	\$411	\$172	1,629	12,884	11,994	96,339
	PY12	2.29	\$2,806	\$6,423	\$93	\$43	\$536	\$225	2,073	16,167	15,316	121,822
Efficient Lighting	PY8	1.43	\$36,579	\$52,270	\$352	\$328	\$2,586	\$799	16,215	227,012	88,864	1,244,102
	PY9	2.45	\$21,383	\$52,316	\$676	\$311	\$2,361	\$730	15,431	216,032	84,566	1,183,925
	PY10	3.49	\$10,689	\$37,258	\$463	\$213	\$2,012	\$622	10,466	146,525	57,357	803,004
	PY11	4.38	\$5,307	\$23,256	\$281	\$129	\$1,264	\$391	6,298	88,171	34,515	483,204
	PY12	0.00	\$120	\$0	\$0	\$0	\$0	\$0	0	0	0	0
Energy Efficient Home	PY8	0.42	\$8,651	\$3,615	\$14	\$13	\$189	\$102	656	7,434	7,357	88,348
	PY9	0.53	\$9,773	\$5,152	\$37	\$17	\$244	\$134	848	9,391	9,941	119,029
	PY10	0.56	\$14,371	\$8,061	\$47	\$22	\$478	\$279	1,065	11,624	14,408	176,217
	PY11	0.61	\$18,804	\$11,503	\$54	\$25	\$688	\$425	1,220	13,241	19,454	244,650
	PY12	0.63	\$21,859	\$13,794	\$56	\$26	\$815	\$523	1,253	13,312	22,561	286,445
Student Energy Efficient Education	PY8	1.89	\$1,243	\$2,348	\$15	\$14	\$138	\$59	673	7,407	5,180	56,977
	PY9	1.97	\$1,271	\$2,502	\$29	\$14	\$133	\$56	673	7,407	5,180	56,977
	PY10	1.91	\$1,390	\$2,657	\$30	\$14	\$169	\$72	673	7,407	5,180	56,977
	PY11	1.95	\$1,419	\$2,766	\$30	\$14	\$178	\$75	673	7,407	5,180	56,977
	PY12	1.07	\$1,689	\$1,815	\$19	\$9	\$115	\$49	426	4,682	3,274	36,014
Home Energy Education	PY8	4.83	\$1,845	\$8,907	\$113	\$106	\$1,070	\$454	5,219	26,095	40,144	200,720
	PY9	5.53	\$1,759	\$9,727	\$234	\$108	\$1,051	\$446	5,341	26,704	41,080	205,400
	PY10	5.38	\$1,952	\$10,506	\$239	\$110	\$1,358	\$576	5,408	27,042	41,600	208,000
	PY11	5.44	\$2,253	\$12,255	\$273	\$126	\$1,617	\$686	6,132	30,661	47,168	235,840
	PY12	6.43	\$2,398	\$15,427	\$339	\$156	\$2,030	\$862	7,533	37,667	57,946	289,731
Low-Income WRAP	PY8	0.70	\$7,225	\$5,047	\$31	\$29	\$283	\$117	1,452	17,111	10,501	123,102
	PY9	0.77	\$6,947	\$5,365	\$64	\$29	\$273	\$113	1,460	17,221	10,564	123,994
	PY10	0.58	\$9,796	\$5,676	\$65	\$30	\$350	\$145	1,462	17,247	10,578	124,179
	PY11	0.60	\$9,966	\$5,930	\$65	\$30	\$369	\$153	1,469	17,342	10,635	124,967
	PY12	0.71	\$6,372	\$4,495	\$47	\$22	\$288	\$129	1,041	11,363	8,268	91,839
Energy Efficiency Kits and Education	PY8	2.01	\$1,262	\$2,538	\$21	\$20	\$190	\$77	988	8,857	7,074	60,368
	PY9	2.07	\$1,408	\$2,918	\$47	\$22	\$198	\$81	1,075	9,637	7,696	65,681
	PY10	2.15	\$1,500	\$3,225	\$49	\$23	\$261	\$107	1,119	10,026	8,007	68,333
	PY11	2.18	\$1,596	\$3,481	\$52	\$24	\$284	\$116	1,162	10,416	8,318	70,989
	PY12	2.07	\$1,133	\$2,341	\$37	\$17	\$223	\$98	832	5,795	6,506	45,620

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

Section 8: Cost -Effectiveness

Residential and Low-Income			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Appliance Recycling	PY8	1.28	\$2,113	\$2,698	\$23	\$22	\$211	\$88	1,065	8,433	7,872	63,210
	PY9	1.31	\$2,108	\$2,757	\$45	\$21	\$196	\$82	1,035	8,192	7,640	61,357
	PY10	1.20	\$2,345	\$2,816	\$44	\$20	\$242	\$101	1,006	7,958	7,415	59,554
	PY11	1.19	\$2,431	\$2,893	\$44	\$20	\$247	\$103	977	7,730	7,196	57,803
	PY12	1.37	\$2,806	\$3,854	\$56	\$26	\$322	\$135	1,244	9,700	9,189	73,093
Efficient Lighting	PY8	1.41	\$27,831	\$39,202	\$264	\$246	\$1,939	\$599	12,161	170,259	66,648	933,076
	PY9	2.39	\$16,400	\$39,237	\$507	\$233	\$1,771	\$547	11,573	162,024	63,425	887,944
	PY10	3.30	\$8,457	\$27,943	\$347	\$160	\$1,509	\$466	7,850	109,894	43,018	602,253
	PY11	3.98	\$4,385	\$17,442	\$211	\$97	\$948	\$293	4,723	66,128	25,886	362,403
	PY12	0.00	\$120	\$0	\$0	\$0	\$0	\$0	0	0	0	0
Energy Efficient Home	PY8	0.34	\$6,814	\$2,350	\$9	\$9	\$123	\$66	426	4,832	4,782	57,426
	PY9	0.45	\$7,439	\$3,349	\$24	\$11	\$159	\$87	551	6,104	6,461	77,369
	PY10	0.49	\$10,586	\$5,240	\$31	\$14	\$311	\$182	693	7,556	9,365	114,541
	PY11	0.55	\$13,651	\$7,477	\$35	\$16	\$447	\$277	793	8,607	12,645	159,023
	PY12	0.58	\$15,475	\$8,966	\$37	\$17	\$530	\$340	815	8,653	14,665	186,189
Student Energy Efficient Education	PY8	1.89	\$1,243	\$2,348	\$15	\$14	\$138	\$59	673	7,407	5,180	56,977
	PY9	1.97	\$1,271	\$2,502	\$29	\$14	\$133	\$56	673	7,407	5,180	56,977
	PY10	1.91	\$1,390	\$2,657	\$30	\$14	\$169	\$72	673	7,407	5,180	56,977
	PY11	1.95	\$1,419	\$2,766	\$30	\$14	\$178	\$75	673	7,407	5,180	56,977
	PY12	1.07	\$1,689	\$1,815	\$19	\$9	\$115	\$49	426	4,682	3,274	36,014
Home Energy Education	PY8	4.83	\$1,845	\$8,907	\$113	\$106	\$1,070	\$454	5,219	26,095	40,144	200,720
	PY9	5.53	\$1,759	\$9,727	\$234	\$108	\$1,051	\$446	5,341	26,704	41,080	205,400
	PY10	5.38	\$1,952	\$10,506	\$239	\$110	\$1,358	\$576	5,408	27,042	41,600	208,000
	PY11	5.44	\$2,253	\$12,255	\$273	\$126	\$1,617	\$686	6,132	30,661	47,168	235,840
	PY12	6.43	\$2,398	\$15,427	\$339	\$156	\$2,030	\$862	7,533	37,667	57,946	289,731
Low-Income WRAP	PY8	0.70	\$7,225	\$5,047	\$31	\$29	\$283	\$117	1,452	17,111	10,501	123,102
	PY9	0.77	\$6,947	\$5,365	\$64	\$29	\$273	\$113	1,460	17,221	10,564	123,994
	PY10	0.58	\$9,796	\$5,676	\$65	\$30	\$350	\$145	1,462	17,247	10,578	124,179
	PY11	0.60	\$9,966	\$5,930	\$65	\$30	\$369	\$153	1,469	17,342	10,635	124,967
	PY12	0.71	\$6,372	\$4,495	\$47	\$22	\$288	\$129	1,041	11,363	8,268	91,839
Energy Efficiency Kits and Education	PY8	2.01	\$1,262	\$2,538	\$21	\$20	\$190	\$77	988	8,857	7,074	60,368
	PY9	2.07	\$1,408	\$2,918	\$47	\$22	\$198	\$81	1,075	9,637	7,696	65,681
	PY10	2.15	\$1,500	\$3,225	\$49	\$23	\$261	\$107	1,119	10,026	8,007	68,333
	PY11	2.18	\$1,596	\$3,481	\$52	\$24	\$284	\$116	1,162	10,416	8,318	70,989
	PY12	2.07	\$1,133	\$2,341	\$37	\$17	\$223	\$98	832	5,795	6,506	45,620

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

Table 99. Pa PUC Table 7D - TRC Benefits, Small C&I Portfolio

Small C&I			Gross TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Small C&I Efficient Equipment	PY8	1.75	\$14,905	\$26,114	\$191	\$178	\$1,388	\$304	8,798	124,175	43,023	601,070
	PY9	1.83	\$15,202	\$27,814	\$391	\$180	\$1,348	\$295	8,916	125,952	43,587	609,529
	PY10	1.85	\$19,635	\$36,395	\$495	\$228	\$2,116	\$464	11,188	157,168	54,714	760,416
	PY11	1.92	\$19,630	\$37,716	\$499	\$229	\$2,198	\$482	11,185	157,123	54,700	760,237
	PY12	2.03	\$18,855	\$38,313	\$493	\$227	\$2,204	\$485	10,982	154,026	53,696	744,869
Small C&I Custom	PY8	1.75	\$9,967	\$17,456	\$106	\$99	\$764	\$348	4,912	71,976	29,011	425,092
	PY9	1.84	\$9,985	\$18,415	\$219	\$101	\$747	\$341	5,005	72,256	29,562	426,745
	PY10	1.95	\$13,272	\$25,894	\$305	\$140	\$1,292	\$589	6,885	96,670	40,665	570,933
	PY11	2.08	\$13,334	\$27,726	\$316	\$146	\$1,392	\$634	7,099	99,870	41,925	589,833
	PY12	2.22	\$12,934	\$28,733	\$319	\$147	\$1,423	\$648	7,099	99,870	41,925	589,833
Small C&I Demand Response	PY8	0.00	\$119	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	2.50	\$294	\$735	\$504	\$232	\$0	\$0	11,500	11,500	0	0
	PY10	2.52	\$294	\$743	\$509	\$234	\$0	\$0	11,500	11,500	0	0
	PY11	2.54	\$294	\$748	\$513	\$236	\$0	\$0	11,500	11,500	0	0
	PY12	2.56	\$294	\$754	\$517	\$238	\$0	\$0	11,500	11,500	0	0
Small C&I Efficient Lighting ²	PY8	1.64	\$2,610	\$4,269	\$31	\$29	\$223	\$51	1,428	19,989	6,888	96,428
	PY9	2.61	\$1,718	\$4,487	\$63	\$29	\$214	\$48	1,428	19,989	6,888	96,428
	PY10	3.86	\$1,220	\$4,706	\$63	\$29	\$269	\$61	1,428	19,989	6,888	96,428
	PY11	5.24	\$930	\$4,876	\$64	\$29	\$279	\$63	1,428	19,989	6,888	96,428
	PY12	N/A	\$0	\$0	\$0	\$0	\$0	\$0	0	0	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

²To account for cross-sector sales, PPL Electric allocates a portion of costs and savings from the Efficient Lighting (Residential) program to the small commercial sector.

Section 8: Cost -Effectiveness

Small C&I			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Small C&I Efficient Equipment	PY8	1.70	\$11,529	\$19,586	\$143	\$134	\$1,041	\$228	6,598	93,131	32,267	450,803
	PY9	1.77	\$11,755	\$20,860	\$293	\$135	\$1,011	\$221	6,687	94,464	32,690	457,147
	PY10	1.78	\$15,342	\$27,296	\$371	\$171	\$1,587	\$348	8,391	117,876	41,036	570,312
	PY11	1.84	\$15,339	\$28,287	\$374	\$172	\$1,648	\$361	8,389	117,842	41,025	570,177
	PY12	1.97	\$14,552	\$28,735	\$370	\$170	\$1,653	\$363	8,237	115,519	40,272	558,651
Small C&I Custom	PY8	1.59	\$5,503	\$8,728	\$53	\$50	\$382	\$174	2,456	35,988	14,506	212,546
	PY9	1.67	\$5,518	\$9,207	\$110	\$50	\$374	\$170	2,503	36,128	14,781	213,372
	PY10	1.73	\$7,487	\$12,947	\$152	\$70	\$646	\$294	3,443	48,335	20,333	285,467
	PY11	1.84	\$7,533	\$13,863	\$158	\$73	\$696	\$317	3,549	49,935	20,963	294,917
	PY12	2.01	\$7,133	\$14,366	\$159	\$73	\$711	\$324	3,549	49,935	20,963	294,917
Small C&I Demand Response	PY8	0.00	\$119	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	2.50	\$294	\$735	\$504	\$232	\$0	\$0	11,500	11,500	0	0
	PY10	2.52	\$294	\$743	\$509	\$234	\$0	\$0	11,500	11,500	0	0
	PY11	2.54	\$294	\$748	\$513	\$236	\$0	\$0	11,500	11,500	0	0
	PY12	2.56	\$294	\$754	\$517	\$238	\$0	\$0	11,500	11,500	0	0
Small C&I Efficient Lighting ²	PY8	1.63	\$1,968	\$3,202	\$23	\$22	\$167	\$38	1,071	14,991	5,166	72,321
	PY9	2.59	\$1,297	\$3,365	\$47	\$22	\$160	\$36	1,071	14,991	5,166	72,321
	PY10	3.80	\$928	\$3,530	\$47	\$22	\$202	\$46	1,071	14,991	5,166	72,321
	PY11	5.11	\$716	\$3,657	\$48	\$22	\$209	\$47	1,071	14,991	5,166	72,321
	PY12	N/A	\$0	\$0	\$0	\$0	\$0	\$0	0	0	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

²To account for cross-sector sales, PPL Electric allocates a portion of costs from the Efficient Lighting (Residential) program to the small commercial sector.

Table 100. Pa PUC Table 7E - TRC Benefits, Large C&I Portfolio

Large C&I			Gross TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Large C&I Efficient Equipment	PY8	1.21	\$9,665	\$11,721	\$71	\$0	\$541	\$325	3,275	44,834	24,198	331,289
	PY9	1.27	\$9,717	\$12,342	\$144	\$0	\$523	\$314	3,279	44,873	24,233	331,573
	PY10	1.30	\$12,211	\$15,849	\$176	\$0	\$790	\$475	3,990	54,819	29,485	405,067
	PY11	1.34	\$11,599	\$15,560	\$169	\$0	\$771	\$463	3,785	51,750	27,971	382,390
	PY12	1.45	\$11,177	\$16,154	\$170	\$0	\$787	\$472	3,778	51,639	27,916	381,569
Large C&I Custom	PY8	1.37	\$7,371	\$10,108	\$61	\$0	\$468	\$281	2,829	38,647	20,905	285,569
	PY9	1.45	\$8,174	\$11,828	\$138	\$0	\$502	\$301	3,149	43,012	23,271	317,826
	PY10	1.99	\$10,944	\$21,814	\$237	\$0	\$1,061	\$637	5,357	75,509	39,584	557,951
	PY11	2.07	\$10,973	\$22,727	\$240	\$0	\$1,095	\$657	5,375	75,673	39,719	559,163
	PY12	2.19	\$10,773	\$23,639	\$242	\$0	\$1,119	\$672	5,375	75,673	39,719	559,163
Large C&I Demand Response	PY8	0.00	\$596	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	1.71	\$1,472	\$2,518	\$2,518	\$0	\$0	\$0	57,500	57,500	0	0
	PY10	1.73	\$1,472	\$2,543	\$2,543	\$0	\$0	\$0	57,500	57,500	0	0
	PY11	1.74	\$1,472	\$2,563	\$2,563	\$0	\$0	\$0	57,500	57,500	0	0
	PY12	1.76	\$1,472	\$2,584	\$2,584	\$0	\$0	\$0	57,500	57,500	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

Section 8: Cost -Effectiveness

Large C&I			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
Large C&I Efficient Equipment	PY8	1.16	\$7,590	\$8,791	\$53	\$0	\$406	\$244	2,456	33,626	18,148	248,467
	PY9	1.21	\$7,629	\$9,257	\$108	\$0	\$392	\$235	2,460	33,654	18,175	248,680
	PY10	1.23	\$9,651	\$11,887	\$132	\$0	\$593	\$356	2,993	41,114	22,113	303,800
	PY11	1.27	\$9,178	\$11,670	\$127	\$0	\$578	\$347	2,839	38,812	20,978	286,792
	PY12	1.38	\$8,760	\$12,115	\$127	\$0	\$590	\$354	2,833	38,729	20,937	286,177
Large C&I Custom	PY8	1.16	\$4,358	\$5,054	\$31	\$0	\$234	\$140	1,415	19,323	10,452	142,785
	PY9	1.23	\$4,807	\$5,914	\$69	\$0	\$251	\$151	1,575	21,506	11,635	158,913
	PY10	1.65	\$6,613	\$10,907	\$118	\$0	\$531	\$319	2,679	37,755	19,792	278,976
	PY11	1.71	\$6,630	\$11,363	\$120	\$0	\$547	\$329	2,688	37,837	19,859	279,582
	PY12	1.84	\$6,430	\$11,820	\$121	\$0	\$560	\$336	2,688	37,837	19,859	279,582
Large C&I Demand Response	PY8	0.00	\$596	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	1.71	\$1,472	\$2,518	\$2,518	\$0	\$0	\$0	57,500	57,500	0	0
	PY10	1.73	\$1,472	\$2,543	\$2,543	\$0	\$0	\$0	57,500	57,500	0	0
	PY11	1.74	\$1,472	\$2,563	\$2,563	\$0	\$0	\$0	57,500	57,500	0	0
	PY12	1.76	\$1,472	\$2,584	\$2,584	\$0	\$0	\$0	57,500	57,500	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

Table 101. Pa PUC Table 7F - TRC Benefits, GNE Portfolio

GNE			Gross TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
GNE Efficient Equipment	PY8	9.56	\$420	\$4,010	\$25	\$23	\$183	\$65	1,156	17,340	6,404	96,055
	PY9	10.03	\$420	\$4,210	\$51	\$23	\$176	\$62	1,156	17,340	6,404	96,055
	PY10	3.62	\$1,220	\$4,416	\$51	\$24	\$221	\$78	1,156	17,340	6,404	96,055
	PY11	3.75	\$1,220	\$4,577	\$52	\$24	\$231	\$81	1,156	17,340	6,404	96,055
	PY12	11.31	\$420	\$4,744	\$52	\$24	\$236	\$83	1,156	17,340	6,404	96,055
GNE Custom	PY8	6.62	\$790	\$5,228	\$36	\$34	\$258	\$118	1,659	21,429	9,796	126,562
	PY9	6.96	\$790	\$5,498	\$73	\$33	\$248	\$113	1,659	21,429	9,796	126,562
	PY10	4.85	\$1,190	\$5,775	\$73	\$34	\$311	\$142	1,659	21,429	9,796	126,562
	PY11	5.03	\$1,190	\$5,985	\$74	\$34	\$325	\$148	1,659	21,429	9,796	126,562
	PY12	7.85	\$790	\$6,199	\$75	\$34	\$332	\$152	1,659	21,429	9,796	126,562
GNE Demand Response	PY8	0.00	\$477	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	2.50	\$1,177	\$2,941	\$2,015	\$927	\$0	\$0	46,000	46,000	0	0
	PY10	2.52	\$1,177	\$2,970	\$2,035	\$936	\$0	\$0	46,000	46,000	0	0
	PY11	2.54	\$1,177	\$2,994	\$2,051	\$943	\$0	\$0	46,000	46,000	0	0
	PY12	2.56	\$1,177	\$3,017	\$2,067	\$950	\$0	\$0	46,000	46,000	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

Section 8: Cost -Effectiveness

GNE			Net TRC Benefits by Program Per Year (\$1000)									
Program	Program Year	TRC	Program Costs (\$1,000) ¹	Program Benefits (\$1,000)	Capacity (Annual)		Energy (Annual)		Load Reduction in kW		MWh Saved	
					Generation	Trans/Dist	Peak	Off Peak	Annual	Lifetime	Annual	Lifetime
GNE Efficient Equipment	PY8	7.17	\$419	\$3,008	\$19	\$18	\$138	\$49	867	13,005	4,803	72,041
	PY9	7.53	\$419	\$3,158	\$38	\$17	\$132	\$47	867	13,005	4,803	72,041
	PY10	2.72	\$1,219	\$3,312	\$38	\$18	\$166	\$59	867	13,005	4,803	72,041
	PY11	2.82	\$1,219	\$3,433	\$39	\$18	\$173	\$61	867	13,005	4,803	72,041
	PY12	8.48	\$419	\$3,558	\$39	\$18	\$177	\$62	867	13,005	4,803	72,041
GNE Custom	PY8	3.83	\$683	\$2,614	\$18	\$17	\$129	\$59	829	10,715	4,898	63,281
	PY9	4.02	\$683	\$2,749	\$36	\$17	\$124	\$56	829	10,715	4,898	63,281
	PY10	2.67	\$1,083	\$2,888	\$37	\$17	\$156	\$71	829	10,715	4,898	63,281
	PY11	2.76	\$1,083	\$2,992	\$37	\$17	\$163	\$74	829	10,715	4,898	63,281
	PY12	4.54	\$683	\$3,099	\$37	\$17	\$166	\$76	829	10,715	4,898	63,281
GNE Demand Response	PY8	0.00	\$477	\$0	\$0	\$0	\$0	\$0	0	0	0	0
	PY9	2.50	\$1,177	\$2,941	\$2,015	\$927	\$0	\$0	46,000	46,000	0	0
	PY10	2.52	\$1,177	\$2,970	\$2,035	\$936	\$0	\$0	46,000	46,000	0	0
	PY11	2.54	\$1,177	\$2,994	\$2,051	\$943	\$0	\$0	46,000	46,000	0	0
	PY12	2.56	\$1,177	\$3,017	\$2,067	\$950	\$0	\$0	46,000	46,000	0	0

¹Annual TRC costs reported in this table are different from those reported in Table 3 (energy efficiency) and Table 4 (demand). The annual costs in this table are nominal annual values and do not include common, portfolio-level costs.

9 Plan Compliance and Other Key Issues

9.1 Plan Compliance Issues

9.1.1 Variety of EE&C Measures with Equitable Distribution

PPL Electric's EE&C Plan offers a variety of measures, and distributes costs and energy savings equitably across all customer sectors. The Company's process for developing the Plan, including an overview of the considerations and steps taken to ensure compliance with the Implementation Order, is outlined in Figure 1 of Section 1. Figure 3 in Section 3.1.2 shows that PPL Electric will offer each customer class a range of energy efficiency and conservation measure and program choices. PPL Electric included education, which is fundamental to understanding and making informed choices about energy efficiency, as a component of all programs.

Programs for residential customers (including low-income) comprise approximately 53% of the total cost and 47% of the total savings projected in this Plan. Programs for nonresidential customers comprise approximately 47% of the total cost and 53% of the total savings. These proportions demonstrate an equitable distribution of savings among customer sectors and are reasonably close to the percentages of market potential attributable to the sectors and the percentage of total PPL Electric revenue attributable to each sector. The percentage of residential (including low-income) cost is greater than the percentage of residential savings (and vice-versa for nonresidential) because the program acquisition cost is higher for residential (including low-income) than for nonresidential, primarily because the program acquisition cost of low-income is much higher than for non-low-income programs.

9.1.2 Manner in which the EE&C Plan Will Achieve Requirements Under Pa. C.S. §§ 2806.1(c) & (d)

By its Implementation Order, the Commission requires PPL Electric to achieve 3.8% energy savings by May 31, 2021, which equates to 1,433,035 MWh/year. The Commission also requires PPL Electric to achieve 92 MW of peak demand reduction over the last four Phase III program years; 79,367 MWh/year of energy savings from the low-income sector; and 50,507 MWh/year from the GNE sector. PPL Electric designed its Plan to achieve all of these objectives. As previously described, the Company designed the Plan to exceed each of those targets by at least approximately 9% (more if there is any carryover savings from Phase II) to allow for uncertainties, such as evaluation results that are not available until significantly after the conclusion of each program year.

9.1.3 Manner in which the EE&C Plan Will Achieve Low-Income Requirements

The Implementation Order requires that a minimum of 5.5% (79,367 MWh/year) of the total required reductions come from the Low-Income customer sector. Savings may not accrue from low-income participation in general residential programs.

Twenty-three measures are available at no cost to low-income customers. While low income customers can participate in residential programs, these 23 measures are offered exclusively to the low-income sector. These measures comprise 35% of the total measures offered. As required under Act 129, this exceeds the fraction of the electric consumption of the utility’s low-income households divided by the total electricity consumption in the PPL Electric Utilities territory (9.95%).

Table 102. Low-Income Sector Compliance (Number of Measures)¹

	Low-Income Sector	All Sectors	% Low-Income	Goal: Low-Income Measures as % of All Measures Offered
Number of measures offered	23	65	35.38%	9.95%

¹ Act 129 includes a provision requiring EDCs to offer a number of energy efficiency measures to low-income households that are “proportionate to those households’ share of the total energy usage in the service territory.” 66 Pa.C.S. §2806.1(b)(i)(G).

PPL Electric designed its Low-Income sector portfolio to exceed the Commission’s low-income set-aside target through Phase III programs alone. Any low-income carryover savings from Phase II will provide an additional margin. The Company will offer targeted programs to income-qualified customers residing in multiple housing types (i.e., single family, multifamily individual metered units, master-metered multifamily buildings, and manufactured homes). PPL Electric will achieve this objective primarily by delivering direct installation measures coupled with distributing energy efficiency education and kits throughout its territory. See Section 3.2.1 for detailed descriptions of low-income program offerings.

9.1.4 Manner in which the EE&C Plan will Achieve GNE Requirements

The Implementation Order requires that a minimum of 3.5% (50,507 MWh/year) of the total required reductions come from the GNE customer sector. To achieve its GNE set-aside target, the Company will offer a wide range of energy efficiency measures to schools, government facilities, and nonprofits.

PPL Electric designed its EE&C Plan to exceed its GNE compliance target through Phase III programs alone. Any GNE carryover savings from Phase II will provide an additional margin. The Company will offer a comprehensive range of energy efficiency measures for GNE customers in both existing buildings and new construction through the Efficient Equipment and Custom programs. Together, these programs offer GNE sector customers the full range of commercial measures. See Section 3.5 for detailed descriptions of GNE program offerings.

9.1.5 Funds Allocated to Experimental Equipment or Devices

All of the measures included in this Plan are proven technologies that are commercially available and technically sound, and most, if not all, are in the TRM, will be added to the TRM, or will be treated as

custom measures. As described in Section 3, PPL Electric included funding for pilots, new technology, and experimental equipment. As was done in Phase II, the Company will submit descriptions of any pilot programs or proposed technology additions to the Pa PUC and stakeholders prior to implementation. Table 103 shows the funds PPL Electric allocated to pilots, new technology and experimental equipment by customer sector.

Table 103. PPL Electric Funds Allocated to Pilots, New Technology, and Experimental Equipment

Sector	Allocated Funds
Residential and Low-income	\$3 million
Small C&I, Large C&I and GNE	\$3 million
Total	\$6 million

PPL Electric will track and limit expenditures on measures deemed experimental to ensure that no more than 2% of Act 129 funds (a maximum of \$6.2 million) are allocated for this purpose.

9.1.6 How the EE&C Plan Will Be Competitively Neutral to All Distribution Customers

As described in Section 9.1.1, each customer class has an opportunity to choose among a range of programs and measures. All of the programs are available to customers regardless of whether they receive default generation service from PPL Electric or obtain competitive supply from an electric generation supplier. Based on their contracted generation supply rate, competitive-supply customers may experience different monthly bill savings than default generation service customers as a result of participating in one of PPL Electric’s programs.

9.2 Other Key Issues

9.2.1 How EE&C Plan Will Lead to Long-Term, Sustainable Energy Efficiency Savings

PPL Electric designed its five-year portfolio of EE&C Plan programs to satisfy the performance requirements set forth in Act 129 and the Commission’s Implementation Order. Many of the measures installed under the proposed programs will continue to perform and produce savings well beyond the term of the Plan. In addition, as described throughout the Plan, PPL Electric will encourage customers to take a comprehensive approach to energy efficiency by offering education and incentives designed to implement multiple measures and to take a whole-home/building approach. Furthermore, PPL Electric programs have and will continue to stimulate demand for energy efficient products and encourage distributors and retailers to stock such equipment. For example, when the Company’s EE&C Plan launched, LED lighting was new to the market and too costly to achieve widespread market adoption. In PY6, PPL Electric’s programs began offering LED bulbs exclusively. As a result, retailers throughout PPL Electric’s territory began to stock and promote LEDs. PPL Electric will continue to encourage the wide availability of program-eligible energy efficiency measures and stimulate increased demand for energy efficient products and equipment, thereby transforming local and regional markets.

9.2.2 How EE&C Plan Will Leverage and Utilize Other Financial Resources

PPL Electric encourages customers to maximize financial resources that are external to Act 129 funding. The Company monitors funding resources, such as state and federal rebates, tax credits, and equipment manufacturers' incentives that might benefit customers, to help offset some of their capital outlay for installing energy efficient products in addition to Act 129 EE&C incentives. The Company includes information about external resources in its annual program training and in regular updates to its CSPs, trade allies, and market partners, and provides relevant information to customers on its website and in relevant program materials.

Additionally, as mentioned in the program descriptions for low-income and GNE, PPL Electric and the Nonresidential and Low-Income CSPs will work with stakeholders, trade allies, and various market partners (e.g., CBOs) to create partnerships that can leverage additional incentives for GNE and low-income customers. Examples could include a nonprofit makeover, in which agencies, trade allies, equipment manufacturers, and others provide incentives (or donate/discount products or services) that could be combined with PPL Electric's incentives to help customers install energy efficiency measures in an applicable building, especially if the joint venture could result in more comprehensive savings. PPL Electric will develop case studies to share the benefits of these efforts and encourage additional joint ventures.

9.2.3 How PPL Electric Will Address Consumer Education

PPL Electric understands that educating customers about the value of energy efficiency is critical to achieving its goals, and includes education as a component of all its Phase III programs. PPL Electric has significantly expanded and improved its Home Energy Education Program (called the Behavior Program in Phase II), including offering a new energy efficiency hub with resources for customers to learn more about energy efficiency actions they can take. PPL Electric and its CSPs treat every customer touch point as an opportunity to provide customer education (see Section 3 for details).

9.2.4 How PPL Electric Will Provide Information on Federal and State Funding Programs

PPL Electric provides information about federal and state funding for EE&C on its energy efficiency website. Funding, including tax credits, has significantly diminished since the start of Act 129.

9.2.5 How PPL Electric Will Provide the Public with Information about Program Results

PPL Electric is committed to keeping customers, stakeholders, and the general public informed about the results of the energy efficiency programs and progress toward Plan goals. PPL Electric hosts a dedicated section on www.pplelectric.com that provides Act 129 information, including quarterly, semi-annual, and annual evaluation reports. The Company will periodically meet with stakeholders to review results, provide semi-annual and annual reports to stakeholders, and post those reports on its website. Additionally, PPL Electric shares customer success stories with customers, trade allies, and the public by publishing and distributing case studies.

Appendix A: Commission approved electricity consumption forecast for the period of June 1, 2009-May 31, 2010³⁷

**PPL Electric Utilities Corporation
Consumption Forecast and Peak Load Data
For the period June 1, 2009 through May 31, 2010
Docket Nos. M-2012-2289411 and M-2008-2069887**

Introduction

In its order entered on January 16, 2009 at Docket No. M-2008-2069887, the Public Utility Commission ("PUC" or the "Commission") established procedures for the implementation of Act 129 of 2008 ("Act 129" of the "Act"). In that order, the PUC directed each Electric Distribution Company ("EDC") subject to Act 129 to submit a consumption forecast for the period June 1, 2009 through May 31, 2010. In its August 3, 2012 Implementation Order at Docket No. M-2012-2289411, the Commission again adopted the June 1, 2009 through May 31, 2010 expected load forecast as the baseline from which to measure incremental savings in Phase II of the Act 129 Energy Efficiency and Conservation Plans.

In this filing, PPL Electric Utilities Corporation ("PPL Electric" or "the Company") is submitting the required data.

Consumption Forecast

Set forth below are PPL Electric's consumption forecast for the period June 1, 2009 through May 31, 2010, as well as a full description of its forecasting methodology, weather normalization methodology, supporting data and the major assumptions reflected in the forecast. The result of the forecast is summarized in Table 104.

Table 104. June 1, 2009 to May 31, 2010, Forecasted

Customer Class	Billed Sales (MWh)
Residential	14,560,303
Commercial	14,093,904
Industrial	9,275,530
Other	172,435
Company Use	36,762
GenCo	75,434
Total	38,214,368

³⁷ Duplicated but reformatted from the referenced filing to match the format of this Phase III EE&C Plan.

Consumption Forecast Methodology

PPL Electric uses an econometric model to forecast monthly sales by customer class (residential, commercial, industrial, and other). Each customer class model is comprised of linear regression or trend models. Historical and forecast economic data used in the models are obtained from Moody's Economy.com. Energy efficiency and end-use data is obtained from the Energy Forecaster's Group of Itron (the forecasting software vendor). These data are based on Energy Information Administration (EIA) historical and forecasted end-use and efficiency data. The methodology is identical to the methodology used by the Company and accepted by the Commission in PPL Electric's previous distribution service base rate proceedings. A summary of each model and methodology are as follows:

Residential

The residential forecast is comprised of four models.

Average monthly usage for premises coded as General Residential Service (GRS) customers is modeled using a linear regression model. Historical monthly average use per customer is regressed against variables for cooling, heating, and other uses (lighting, cooking, water heating, etc.). Forecast drivers include weather, billing days, household size, household income, price, and energy efficiency indexes.

Average monthly usage for premises coded as Electrically Heated Homes (EHH) customers is also modeled using a linear regression model. Historical monthly average use per customer is regressed against variables for cooling, heating, and other uses. Forecast drivers include weather, billing days, household size, household income, price, and energy efficiency indexes.

The Residential Customer Forecast is a regression model of PPL Electric's customer counts as a function of the population in its service territory.

Electrically Heated Homes Share is a trend model used to allocate the forecast of residential customers to GRS and EHH.

Commercial

The commercial customer class is forecasted as a whole using a linear regression model. Historical commercial usage is regressed against variables for heating, cooling, and a base usage. Forecast drivers include weather, billing days, population, non-manufacturing output, and energy efficiency indexes.

Industrial

The industrial forecast is segmented into four major sub-categories: food, steel, chemical, and other. All four sub-categories are modeled using a linear regression model.

- 1) Historical Industrial-Food usage is regressed against variables for weather, price, and GOP-Manufacturing-Food.
- 2) Historical Industrial-Steel usage is regressed against variables for price and GOP-Manufacturing-Primary Metal Industries.

Appendix A

- 3) Historical Industrial-Chemical usage is regressed against variables for weather, price, and GOP-Manufacturing-Chemical & Allied Products.
- 4) Historical Industrial-Other usage is regressed against variables for weather, price, billing days, and GOP- Manufacturing.

Other

The other forecast is comprised of three models: Public Authority, Railroad, and Borderline.

- 1) Public Authority is modeled using a linear regression model. Historical usage is regressed against a variable for population.
- 2) Railroad and Borderline are modeled using exponential smoothing models.
- 3) GENCO/Company Use-The GENCO and Company Use forecasts are both modeled using seasonal exponential smoothing models. The GENCO forecast is for station net-metered usage at affiliated generating stations owned by PPL Generation. The Company Use forecast is for PPL Electric's facilities, such as service centers.

Institutional Consumption

Act 129 specifies that a minimum of 10% of the required reductions in consumption shall be obtained from units of federal, state and local government, including municipalities, school districts, institutions of higher education and non-profit entities. For PPL Electric, the 2008 consumption for customers in this group totaled 3.4 million kWh, which is just under 9% of total consumption.

Major Assumptions

Economic Conditions-The forecast is based on a continuation of the recession through the middle of 2009, with a slow recovery beginning during the second half of the year. More normal GDP growth is expected to return in the second half of 2010.

Weather-Normal weather is assumed for the forecast period. PPL Electric uses a 10-year normal Heating Degree Days (HDDs) and Cooling Degree Days (CDDs) to reflect the trend toward warmer winter weather over the past decade. Prior to 2008, PPL Electric used a 20-year normal, but was consistently over-forecasting sales during the winter months and under-forecasting during the summer months. In order to provide the most accurate monthly forecast, PPL Electric changed to a 10-year normal for the 2008-2012 planning period. A rolling normal is used, and there currently is little difference between the 10- and 20-year rolling normal HDDs, as high HDD years in the 1980s fall out of the rolling 20-year period. However, the rolling normal for CDDs continues to climb. The differences between the 10-year, 20-year, and 30-year normals are shown in Table 105.

Table 105. 10-Year, 20-Year, and 30-Year Normal Degree Days

	10-year Normal	20-year Normal	% Change	30-year Normal	% Change
HDD	5,603	5,596	+0.1%	5,700	-1.7%
CDD	828	813	+1.8%	798	+3.8%

The use of a 10-year normal reduces monthly forecast variances and, on an annual basis, reduces the consumption forecast by less than 0.2% compared to the 30-year normal.

Rate Cap Expiration

The forecast assumes that rate caps for PPL Electric's retail customers expire at the end of 2009, which will result in decreased consumption in 2010.

Energy Efficiency and Conservation (EE&C) Measures- EE&C measures resulting from Act 129 are not included in the forecast.

Consumption Forecast Accuracy

Since 2000, PPL Electric's billed sales forecast accuracy has had a Mean Average Percentage Error (MAPE) of 0.9% on a weather-normalized basis. Table 106 shows the actual and weather-adjusted billed sales variance vs. forecast over this time period.

Table 106. Actual Billed Sales and Weather-Adjusted Billed Sales, Variance vs. Forecast

Year	Forecasted Billed Sales (MWh)	Actual Billed Sales (MWh)	Actual Billed Sales vs. Forecast	Weather-Adjusted Billed Sales (MWh)	Weather Adjusted Billed Sales vs. Forecast
2000	33,806,574	33,844,469	0.1%	34,123,298	0.9%
2001	33,817,831	34,576,695	2.2%	34,749,744	2.8%
2002	35,241,722	34,779,292	-1.3%	34,397,979	-2.4%
2003	35,598,244	35,291,594	-0.9%	35,215,173	-1.1%
2004	36,689,129	35,791,611	-2.4%	36,056,721	-1.7%
2005	36,835,033	37,262,218	1.2%	36,458,105	-1.0%
2006	37,295,451	36,715,684	-1.6%	37,192,547	-0.3%
2007	37,497,311	37,839,168	0.9%	37,665,070	0.4%
2008	38,029,900	38,135,600	0.3%	38,328,200	0.8%

Appendix B: Approved CSP Contracts

As of the date of this filing, November 30, 2015, PPL Electric does not have any approved CSP contracts for Phase III.

Appendix C: Calculation of Annual Savings and Costs

The Phase III Plan includes tables showing program by program calculation of savings and costs for each program and plan year (see Section 7.3). Please refer to Table 91 (Pa PUC Table 6A) in the plan for portfolio specific assignment of EE&C costs. Table 92 (Pa PUC Table 6B) provides detail on the allocation of common costs to applicable customer sectors. Table 93 (Pa PUC Table 6C) provides a summary of portfolio EE&C costs.

Section 8 of the Plan provides a complete overview of program costs and benefits. The Plan includes cost-effectiveness calculations by program and program year in Section 8.2. Specifically, Table 96 through Table 101 (Pa PUC Tables 7A through 7F) show TRC benefits by program and plan year for each sector.

Appendix D: Calculation Methods and Assumptions

PPL Electric based its savings and cost estimates on experience from Phase I and Phase II, the TRM, input from stakeholders and trade allies, and measure cost data generated by the sector-level CSPs using a variety of sources, including the SWE incremental cost database, DEER, and actual measure acquisition costs for direct installations. Many variables can impact the cost and effectiveness of a measure or program, and these variables led to numerous TRM changes during Phase I and Phase II that influenced program savings, acquisition cost, and TRC test results. In Phase III, PPL Electric will use the experience and knowledge gained from prior phases to monitor and adjust measures and programs that ensure the optimum balance of cost and benefits.

In most instances, the sector-level CSPs based their Phase III savings calculations on the current TRM algorithms and industry practices. For measures that were not in the TRM, PPL Electric worked with the sector-level CSPs or used its experience gained from delivering programs in prior phases to calculate measure- and program-level savings, such as the average savings per lighting retrofit or custom project.

The CSPs based incentive and rebate levels on a percentage of incremental cost from the Market Potential Studies, online research, and conversations with installation contractors, as well as prior phase experience. These incentive and rebate amounts ranged, on average, from 25% to 75% of the incremental cost of a measure. Some measures require a higher incentive to motivate customer action, while others can have a lower incentive because market transformation and other factors can affect customer behavior.

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

- Sector-level CSPs calculated costs required for individual program and cross-sector marketing to generate sufficient participation to meet PPL Electric's Act 129 targets, based on their implementation experience and knowledge of PPL Electric's market.
- PPL Electric's allocated portion of common costs for overarching marketing and advertising campaign. This entails developing consistent messaging and branding guidelines, conducting market research to contribute to targeted messaging strategies, and providing direction and oversight to support sector-level CSP marketing efforts.

Finally, administrative costs include all utility costs to develop, implement, and manage the Plan, except payments to customers/trade allies (rebates and incentives). These costs include PPL Electric labor and materials, CSP labor and material, marketing, QA/QC and EM&V, tracking systems, legal, and the SWE costs.³⁸ These Phase III costs were based on PPL Electric wage rates; tracking system cost from prior phases; and EM&V costs from prior phases with downward adjustments to reflect efficiencies, lessons learned, and revisions to prior phase systems and processes to increase Phase III operational efficiency.

³⁸ PPL Electric's share of the SWE costs is not subject to the Act 129 cost cap.

PPL Electric Utilities Corporation

ACT 129 COMPLIANCE RIDER – PHASE 3

A Phase 3 Act 129 Compliance Rider (ACR 3) shall be applied, on a non-bypassable basis, to charges for electricity supplied to customers who receive distribution service from the Company under this Tariff. The ACR 3 will be implemented beginning June 1, 2016.

The ACR 3 shall be computed separately for each of the following three customer classes:

- (1) Residential: Consisting of Rate Schedules RS and RTS (R),
- (2) Small Commercial and Industrial (Small C&I): Consisting of Rate Schedules GS-1, GS-3, BL, SA, SM (R), SHS, SLE, SE, TS (R), and GH-2 (R), and
- (3) Large Commercial and Industrial (Large C&I): Consisting of Rate Schedules LP-4, LP-5, LPEP, and LSS.

The ACR 3 will be computed for each customer receiving distribution service from the Company using the formulae described below. For residential customers, the ACR 3 charge shall be included in the distribution charges on a kWh basis of the monthly bill. For all other customers, the ACR charge shall be listed as a separate charge on the monthly bill. All charges shall be reconciled on an annual basis for undercollections and overcollections experienced during the previous year. Charges set forth in the residential rate schedules in this tariff have been adjusted to reflect application of the currently effective ACR 3.

The ACR 3 for the Residential class and the Small C&I class shall be computed using the following formula:

$$\text{ACR 3} = [\text{ACc/S} - \text{E/S}] \times 1 / (1-\text{T})$$

The ACR 3 for the Large C&I class shall be computed using the following formula:

$$\text{ACR 3} = [\text{ACc/D} - \text{E/D}] \times 1 / (1-\text{T})$$

Where:

ACc = An annual budget of all costs required for the Company to implement its Commission-approved Phase 3 Energy Efficiency and Conservation (EE&C) Plan during a compliance year. A compliance year is the 12-month period beginning June 1 of each calendar year and ending May 31 of the following calendar year. The annual project program cost is the sum of all direct and indirect costs (including all design and development costs, general administrative costs, and applicable statewide evaluator costs) required to implement the Company's EE&C Plan divided by the number of months in the Company's EE&C Plan for the given application year. All deferred design and development cost, general administrative costs, and applicable statewide evaluator costs will be amortized over a 36 month period.

The costs of each EE&C program available to only one customer class will be directly assigned to that customer class. Costs of EE&C programs which cannot be directly assigned to one customer class will be allocated to the customer classes benefiting from those programs using an allocation factor determined by dividing the EE&C costs directly assigned to each customer class by the total of the Company's EE&C Plan costs directly assigned to all customer classes.

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ACT 129 COMPLIANCE RIDER – PHASE 3 (CONTINUED)

- D = For the Large C&I customer class, the total of the monthly billing demands for all customers in the class, projected for the computation year. The peak demand will be based on the customer's peak load contribution to the PJM peak load during the prior PJM Planning Year.
- E = Net over or undercollection of the ACR 3 charges as of the end of the 12-month period ending March 31 immediately preceding the next compliance year. Reconciliation of the ACR 3 will be conducted separately for each of the three customer classes based upon the actual expenses incurred and actual revenues received for each customer class. No interest shall be computed monthly on over or undercollections. The reconciliation of ACR 3 revenues and expenses shall be adjusted during the 2017-2018 ACR 3 application year to reflect actual data for the months of April and May 2015, as well as any expenses incurred prior to April 30, 2016, but paid after that date.
- S = The Company's total billed KWH sales in each customer class who receive distribution service under this tariff (including distribution losses), projected for the computation year.
- T = The total Pennsylvania gross receipts tax rate in effect during the billing period, expressed in decimal form.

The ACR 3 shall be filed with the Pennsylvania Public Utility Commission (Commission) by May 1 of each year. The ACR 3 charge shall become effective for distribution service provided to all customers on or after the following June 1, unless otherwise ordered by the Commission, and shall remain in effect for a period of one year, unless revised on an interim basis subject to the approval of the Commission. Upon determination that a customer class's ACR 3, if left unchanged, would result in a material over or undercollection of Phase 3 Act 129 Compliance costs incurred or expected to be incurred during the current 12-month period ending May 31, the Company may file with the Commission for an interim revision of the ACR 3 to become effective ten (10) days from the date of filing, unless otherwise ordered by the Commission.

At the conclusion of the Phase 2 EE&C Plan on May 31, 2016, collections under the ACR 2 for each customer class will be reconciled to the total cost of the EE&C Plan allowed by the Commission for that customer class. Overcollections or undercollections will be reflected as a separate line item in the E factor calculation and will be refunded or recovered through application of the ACR 3 rate effective June 1, 2016 through March 31, 2017. If any over/under collection balance is expected to remain after March 31, 2017, the collection will be included in the ACR 3 rate going forward.

Minimum bills shall not be reduced by reason of the ACR 3 nor shall charges hereunder be a part of the monthly rate schedule minimum. The ACR 3 shall not be subject to any credits or discounts. The State Tax Adjustment Surcharge (STAS) included in this Tariff is applied to charges under this Rider. Charges under ACR 1, and ACR 2, and ACR 3 will be combined for billing purposes only.

The Company shall file a report of collections under the ACR 3 within thirty (30) days following the conclusion of each compliance-year.

Application of the ACR 3 shall be subject to review and audit by the Commission at intervals it shall determine. The Commission shall review the level of charges produced by the ACR 3 and the costs included therein.

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ACT 129 COMPLIANCE RIDER – PHASE 3 (CONTINUED)

ACT 129 COMPLIANCE RIDER – PHASE 3 CHARGE

Charges under the ACR 3 for the period June 1, 2016 through May 31, 2017, as set forth in the applicable Rate Schedules.

Customer Class	Large C&I	Small C&I	Residential
Rate Schedule / Charge	LP-4, L5S, LP-5, and LPEP	GS-1, GS-3, BL, and GH-2 (R)	RS and RTS (R)
	\$X.XXX /KW	\$X.XXXXX /KWH	\$X.XXXXX /KWH

Small C&I – Street Lights										
Rate Schedule/ Charge	SA		SM (R)		SHS		SLE		SE	TS (R)
	Nominal Lumens	Charge	Nominal Lumens	\$/Lamp	Nominal Lumens	\$/Lamp	Nominal Lumens	\$/Fixture	\$/KWH	\$/Watt
HPS 9,500	X.XXX \$/Lamp	3,350	X.XXX	5,800	X.XXX	2,600	X.XXX	X.XXXXX	X.XXXXX	
		6,650	X.XXX	9,500	X.XXX	3,300	X.XXX			
		10,500	X.XXX	16,000	X.XXX	3,800	X.XXX			
	LED 4,300	X.XXX \$/Fixture	20,000	X.XXX	25,500	X.XXX	4,900			X.XXX
			34,000	X.XXX	50,000	X.XXX	7,500			X.XXX
			51,000	X.XXX			15,000			X.XXX
							20,000			X.XXX

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VERIFICATION

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

Date: November 30, 2015


Peter D. Cleff