

COMMONWEALTH OF PENNSYLVANIA



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February 11, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for Approval
of Its Act 129 Phase IV Energy Efficiency and
Conservation Plan
Docket No. M-2020-3020830

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 5.412 and the attached Interim Order, enclosed please find a copy of the Office of Consumer Advocate's (OCA) admitted evidence, including:

- OCA Statement No. 1, Direct Testimony of Stacy L. Sherwood
 - o Exhibit SLS-1: PECO Energy Company Phase IV Implementation Order Compliance Checklist
 - o Attachment A: Qualifications of Stacy L. Sherwood
- February 8, 2021 Interim Order Adopting Joint Stipulation for Admission of Evidence and Admitting Evidence into the Record

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Laura J. Antinucci

Laura J. Antinucci

Assistant Consumer Advocate

PA Attorney I.D. # 327217

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Enclosures:

cc: The Honorable Mark A. Hoyer (**email only**)
The Honorable Emily I. DeVoe (**email only**)
Certificate of Service

*303894

CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company :
for Approval of Act 129 Phase IV Energy : Docket No. M-2020-3020830
Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's § 5.412a filing of Admitted Evidence, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 11th day of February 2021.

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Dated: February 11, 2021

*303895

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY)
COMPANY FOR APPROVAL OF)
ITS ACT 129 PHASE IV ENERGY) DOCKET NO. M-2020-3020830
EFFICIENCY AND)
CONSERVATION PLAN)**

DIRECT TESTIMONY

OF

STACY L. SHERWOOD

**ON BEHALF OF
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE**

JANUARY 14, 2021

EXETER

ASSOCIATES, INC.

10480 Little Patuxent Parkway Suite 300
Columbia, Maryland 21044

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1 **I. INTRODUCTION**

2 Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS
3 ADDRESS?

4 A. My name is Stacy L. Sherwood. I am an Economist with Exeter Associates, Inc.
5 (“Exeter”). Our offices are located at 10480 Little Patuxent Parkway, Suite 300,
6 Columbia, Maryland 21044. Exeter is a firm of consulting economists specializing in
7 issues pertaining to public utilities.

8 Q. PLEASE DESCRIBE YOUR QUALIFICATIONS, WORK EXPERIENCE,
9 AND EDUCATIONAL BACKGROUND.

10 A. I have 11 years of experience in the energy sector, related specifically to the review
11 and development of energy efficiency and demand response programs and policies for
12 the use of advanced technologies for pollution prevention and energy efficiency. With
13 Exeter, I provide technical support and analysis to state and federal clients on energy
14 efficiency, distributed resources, demand response, and renewable energy. While
15 serving as Assistant Director of the Energy Analysis and Planning Division of the
16 Maryland Public Service Commission, I oversaw the utilities energy efficiency and
17 demand response programs, participated in smart grid work groups, and assisted with
18 the composition of Maryland’s Ten Year Plan regarding the state’s energy outlook. I
19 hold a Bachelor’s Degree in Accounting, Business and Economics from McDaniel
20 College (2009). My qualifications are detailed in my resume, included with this
21 Testimony as Attachment A.

22 Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY
23 PROCEEDINGS ON UTILITY ISSUES?

24 A. Yes. A complete list is provided in Attachment A.

25 Q. ON WHOSE BEHALF ARE YOU APPEARING?

1 A. I am presenting testimony on behalf of the Pennsylvania Office of Consumer
2 Advocate (“OCA”).

3 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

4 A. On November 30, 2020, PECO Energy Company (“PECO” or “Company”) filed its
5 *Petition of PECO Energy Company for Approval of its Act 129 Phase IV Energy*
6 *Efficiency and Conservation Plan* (“Phase IV Plan” or “Plan”) with the Commission.
7 Exeter was retained by the OCA to assist in the review of the Plan. I will address the
8 Plan’s compliance with the Commission’s *Phase IV Final Implementation Order*
9 which includes requirements for the Phase IV Energy Efficiency and Conservation
10 (“EE&C”) plans including comprehensive programs requirements, limited income
11 carve-outs, and the bidding of demand savings into the PJM Interconnection, LLC
12 (“PJM”) Forward Capacity Market (“FCM”).¹ Additionally, I discuss the
13 reasonableness and achievability of the programs offered to residential ratepayers.

14 Q. HAVE YOU PREPARED EXHIBITS TO ACCOMPANY YOUR
15 TESTIMONY?

16 A. Yes. Exhibit SLS-1 provides a summary of how PECO’s Plan meets the Commission’s
17 *Phase IV Implementation Order*, which is discussed further in Section 2.

18 Q. PLEASE DESCRIBE THE MAIN COMPONENTS OF THE COMPANY’S
19 PLAN.

20 A. PECO’s Phase IV Plan consists of five energy efficiency programs that are designed to
21 achieve an average annual energy reduction of 1,605,107 megawatt-hours (“MWh”)
22 over the five years of the program, with no carryover savings.² As a result of its EE&C
23 programs, PECO anticipates that it will achieve 326.6 megawatts (“MW”) of demand

¹ Docket No. M-2020-3015228 *Phase IV Final Implementation Order* adopted June 18, 2020.

² *PECO PY 13 – P 17 Act 129 Phase IV Energy Efficiency and Conservation Plan*, November 30, 2020, Figure 2. Summary of PECO’s Phase IV Plan: Annual Energy Savings (MWh) by Program, p. 3.

1 savings.³ PECO plans to select a third-party vendor through a request for proposal
2 process to nominate up to 50 MW of its peak demand reductions into the PJM FCM.⁴
3 The Company forecasts that it will fully expend its expenditure cap, with an average
4 annual spend of \$85.48 million, which excludes PECO’s estimated \$2.1 million
5 allocated for the statewide evaluator (“SWE”), equating to a total Phase IV budget of
6 \$427.4 million.⁵

7 The five energy efficiency programs include: Residential, Income-Eligible,
8 Residential Home Energy Reports, Income-Eligible Home Energy Reports, and Non-
9 Residential. The Residential Program includes the following sub-components:
10 Rebates and Marketplace; In-Home Assessments; Multifamily; Appliance Recycling;
11 and New Construction. The Income-Eligible Program consists of two sub-
12 components: Single-Family Income-Eligible (one- or two-unit buildings) and
13 Appliance Recycling. The Residential Home Energy Reports and Income-Eligible
14 Home Energy Reports Programs do not have any sub-components. The Non-
15 Residential Program consists of two sub-components: Prescriptive and Custom.

16 The breakdown of the total estimated savings and costs between programs as
17 proposed by the Company is provided in Tables 1 and 2 below, respectively.

³ Id, Figure 3. Summary of PECO’s Phase IV Plan: Peak Demand Savings (MW) by Program, p.3.

⁴ *Petition of PECO Energy Company for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan*, November 30, 2020, p. 10.

⁵ Direct Testimony of Richard A. Schlesinger, p. 7, line 8 through p. 8, line 8.

1 **Table 1. Phase IV Total Projected Energy and Demand Savings, by Program**

Program	Total Projected Savings (MWh)	Percent of Total MWh Savings	Total Projected Savings (MW)	Percent of Total MW Savings
Residential	234,929	15%	35.6	11%
Income-Eligible	84,841	5	12.6	4
Residential Home Energy Report	112,656	7	44.0	14
Income-Eligible Home Energy Report	5,734	0	1.2	0
Non-Residential	1,166,947	73	233.3	71
Total:	1,605,107	100%	326.7	100%

2 **Table 2. Phase IV Total Projected Expenditures, by Program (\$000)**

Program	Total Direct Costs	Total Common Costs	Total Costs	Percent of Total Cost
Residential	\$71,822			
Income-Eligible	41,453			
Residential Home Energy Reports	9,688	\$13,428	\$136,884	32%
Income-Eligible Home Energy Reports	493			
Non-Residential	252,906	37,596	290,502	68
Total:	\$376,362	\$51,024	\$427,386	100%

3 Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.

4 A. Based on the results of my review and analysis, I have reached the following
5 conclusions:

- 6 • The Commission should approve PECO’s Phase IV Plan, subject to the
7 recommendations provided throughout my testimony.
- 8 • PECO should dedicate a portion of its research and development budget for
9 exploring residential measures and program offerings and should continue to
10 innovate its portfolio of residential programs.

- 1 • If the Residential Home Energy Reports or Income-Eligible Home Energy
2 Reports programs do not render the majority of their projected savings in the
3 first year of Phase IV due to impacts from COVID, PECO should consider
4 pausing the program until conditions improve.
- 5 • PECO should utilize a methodology to prevent double-counting of savings for
6 programs that leverage outside funding, such as the multifamily portion of the
7 Residential Program and Income-Eligible Program.
- 8 • The Commission should require PECO to file its plan for nominating demand
9 response into the PJM FCM, which should include the following details:
 - 10 ○ Delivery year for the first nomination;
 - 11 ○ Measures that will provide demand reductions, by customer class;
 - 12 ○ Methodology to determine which rate classes have delivered demand
13 reductions; and
 - 14 ○ Details on how PECO will limit ratepayer exposure to penalties,
15 including a sensitivity analysis of the impact to the Phase IV Energy
16 Efficiency & Conservation Program Charge (“Phase IV EEPC”).

17 Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

18 A. Following this introductory section, my testimony is divided into five sections:
19 Compliance with *Phase IV Implementation Order*; Residential Program; Income-
20 Eligible Program; Home Energy Reports Programs; and PJM Forward Capacity
21 Market.

22
23 **II. COMPLIANCE WITH PHASE IV IMPLEMENTATION ORDER**

24 Q. HAVE YOU REVIEWED THE PHASE IV PLAN?

25 A. Yes. I have reviewed the material filed in the Company’s Plan, including the Direct
26 Testimonies of Doreen L. Masalta, Nicholas DeDominicis, William R. Supple, and
27 Richard A. Schlesinger. In addition, I have reviewed the Company’s responses to
28 OCA Interrogatory Set I. The Company’s filing describes the programs to be
29 implemented in accordance with the requirements established in Act 129 of 2008 for
30 plan years (“PYs”) 13-17, which will begin in 2021 and end in 2026.

1 Q. DOES THE PLAN MEET THE REQUIREMENTS OF THE
2 COMMISSION'S *PHASE IV IMPLEMENTATION ORDER*?

3 A. Yes. I found that, as proposed by the Company, the Plan meets each of the Phase IV
4 requirements from the Phase IV Implementation Order. A checklist summarizing each
5 of the requirements and whether they have been met is provided in Exhibit SLS-1. The
6 requirements outlined in the *Phase IV Implementation Order* serve as the framework
7 for the development of the plans. In addition to meeting those requirements, the plans
8 should be achievable and be a prudent investment of ratepayer funds. The remainder
9 of this testimony evaluates whether the plan meets those additional requirements.

10 Q. ARE YOU CONCERNED ABOUT THE SIGNIFICANT INVESTMENT
11 IN NON-RESIDENTIAL RATE CLASS COMPARED TO RESIDENTIAL
12 RATE CLASS?

13 A. No. In prior phases, lighting measures have provided significant low-cost energy
14 reductions in residential programs. However, as noted in the next section, Phase IV
15 will have a limited offering of residential lighting measures due to the Energy
16 Independence and Security Act of 2007 ("EISA"). As a result of this change, the level
17 of energy savings from the residential sector will decrease and the acquisition cost for
18 that energy savings will increase. Therefore, it is reasonable to expect that the increase
19 in acquisition cost to achieve savings from the residential sector would result in PECO
20 designing an EE&C portfolio that achieves the majority of its Phase IV energy savings
21 target through the non-residential sector, which does not face similar barriers.

22 Q. IS THE PLAN PROJECTED TO BE COST-EFFECTIVE?

23 A. A total resource cost ("TRC") above 1.0 indicates that the Plan provide benefits that
24 exceed the costs invested in the program, indicating that ratepayers, including non-
25 participants, should receive a return on the investment in energy efficiency. Overall,

1 the proposed Plan is projected to be cost-effective, with a gross TRC of 1.14 over the
2 five-year period. Each proposed program is projected to be cost-effective on its own,
3 with gross TRCs ranging from 1.04 to 1.95.

4 Q. HAVE YOU DETERMINED THE COMPANY'S PLAN TO BE
5 REASONABLE AND WELL-BALANCED?

6 A. To determine whether the Company's Plan is reasonable and well-balanced, I
7 examined the features of the programs to identify whether the Plan includes accessible
8 program options for all ratepayers, and I evaluated the return on investment to
9 ratepayers. The Plan proposed by the Company provides programs that are sufficiently
10 diverse to allow all ratepayers an opportunity to participate in at least one program and
11 offers a comprehensive program to both residential ratepayers, including low-income
12 ratepayers, and non-residential ratepayers. The programs offered under the Plan are
13 considered the best practices among other utility energy efficiency programs
14 nationwide. Additionally, the measures included in the programs have been evaluated
15 through the SWE.

16 Q. HAVE YOU REVIEWED THE COMPANY'S PROPOSED RECOVERY
17 METHOD, PHASE IV ENERGY EFFICIENCY & CONSERVATION
18 PROGRAM CHARGE?

19 A. Yes. PECO proposes to recover costs associated with the Phase IV plan through the
20 Phase IV Energy Efficiency & Conservation Program Charge ("Phase IV EEPC"),
21 which includes individual calculations for six different groups of ratepayers.⁶ The
22 proposed Phase IV EEPC is the same method as Phase III, with a modification to
23 reflect PJM FCM proceeds and deficiency charges. Additionally, PECO is proposing
24 to combine its Phase III EEPC and Phase IV EEPC into a single surcharge and a single

⁶ The Phase IV EEPC charge is calculated for the following groups of rate schedules: 1) Rates R, Rs, RH; 2) Rate GS; 3) Rates SL-E, SL-C; 4) Rate AL; 5) Rate TLCL; and 6) Rates HT, PD, EP.

1 tariff provision; however, there will be no comingling of Phase IV and Phase III costs
2 or revenues as they will be under separate general ledger accounts. I do not oppose
3 PECO's request to combine the surcharges into a single surcharge and single tariff
4 provision.
5

6 **III. RESIDENTIAL PROGRAM**

7 Q. HAVE YOU DETERMINED THAT THE RESIDENTIAL PROGRAM
8 DESCRIBED IN PECO'S PLAN ALLOWS FOR ALL RESIDENTIAL
9 RATEPAYERS TO PARTICIPATE?

10 A. Yes. The Residential Program is open to all residential customers, including those on
11 master-metered accounts. Under the Residential Program, ratepayers can receive
12 appliance recycling, home audits, weatherization measures, and rebates for lighting;
13 appliances; new construction; and heating, ventilation and air conditioning ("HVAC")
14 measures. Additionally, the program will have specific offerings for multifamily
15 buildings, including common areas for both individually metered and master-metered
16 buildings.

17 Q. PLEASE DISCUSS THE COST-EFFECTIVENESS OF THE PROPOSED
18 RESIDENTIAL PROGRAM.

19 A. The Residential Program, exclusive of the Low-Income programs, is cost-effective
20 when evaluated under the TRC test formula for measuring cost-effectiveness. The
21 Company's forecasted program costs and energy savings levels produce a gross TRC
22 of 1.18.

23 Q. ARE YOU CONCERNED ABOUT THE TRC FOR THE RESIDENTIAL
24 PROGRAM?

1 A. Yes. The level of net benefits from this program is close to 1.0; however, the
2 Residential Program's components are mature and established in Phase III, if not
3 earlier. The positive result of that is that the Residential Program should experience
4 lower administrative costs, as the programs are already established and the marketing
5 is in place to continue the promotion of the program. The negative side of the
6 Residential Program being mature is that the low-hanging fruit has been captured in
7 the prior phases, which makes reaching new or repeat participants potentially more
8 challenging and costly. Furthermore, the Residential Program lacks an array of new
9 and innovative measures.

10 Q. DO YOU HAVE A RECOMMENDATION THAT MAY PROVIDE
11 REASSURANCE AS TO THE COST-EFFECTIVENESS OF THE
12 RESIDENTIAL PROGRAM?

13 A. Yes. I recommend that the Company continue to innovate its Residential Portfolio
14 throughout Phase IV. The Company indicated that it plans to dedicate 5% of its annual
15 Phase IV budget towards research and development ("R&D") to investigate and/or
16 pilot new technology and to identify and respond to market transformations. As the
17 program components mature, it is important for the portfolios to develop new offerings
18 as a way to continue to garner participation, including from those that have previously
19 participated in other programs. Therefore, I support the Company's R&D efforts and
20 recommend it use a portion of that budget to investigate residential offerings.

21 Q. DO YOU BELIEVE THAT THE PROPOSED PLAN IS ACHIEVABLE
22 BASED UPON PRIOR PROGRAM PERFORMANCE?

23 A. I believe that the Residential Program is achievable and that the projected savings are
24 realistic, given prior performance and the elimination of most of the lighting measures
25 from the Residential Program. Historically, the residential portfolio has been reliant

1 on highly cost-effective energy savings from the lighting program. As the result of
2 compliance with EISA, the level of savings projected in Phase IV from lighting is a
3 fraction of what has been experienced in prior phases. This results in significantly
4 lower energy savings, shown with the Phase IV target to be achieved over five years
5 is almost equivalent to the savings achieved in PY10. Given the performance,
6 excluding lighting, in Phase III to date, I believe that the plan proposed is achievable.
7 However, I will note that it is unclear what impact COVID-19 may have on the early
8 years of Phase IV. Although the savings seem achievable based on Phase III verified
9 savings, measures that require contractors to be within a residence may experience
10 lower participation rates at the beginning of Phase IV.

11 12 **IV. INCOME-ELIGIBLE PROGRAM**

13 Q. WHAT IS THE INCOME-ELIGIBLE PROGRAM PROPOSED BY THE
14 COMPANY?

15 A. The Company's Income-Eligible Program includes a Single-Family Income-Eligible
16 sub-component that offers home assessments and is coordinated with other programs
17 offered by the Low-Income Usage Reduction Program ("LIURP"), Philadelphia Gas
18 Works, and Philadelphia Water Department, and another sub-component of appliance
19 recycling. The Single-Family Income-Eligible sub-component is offered to one- and
20 two-unit homes. Multi-family homes—consisting of three or more units—that are
21 income-qualified, are served through the Residential Program. Through an in-home or
22 virtual energy check-up, potential energy efficiency measures are identified. The
23 program provides the following measures at no additional cost: lighting, HVAC,
24 appliances, air sealing and insulation, and water heating. Qualified ratepayers can
25 participate in the Appliance Recycling sub-component either by requesting pick up or

1 when the measures are identified through the Single-Family Income-Eligible home
2 assessment.

3 Q. DO YOU BELIEVE THAT THE INCOME-ELIGIBLE PROGRAM IS A
4 SUFFICIENT OFFERING FOR PECO'S LOW-INCOME CUSTOMERS?

5 A. Yes. With the addition of the remote assessment, any income-qualified residential
6 ratepayers will have an opportunity to participate in the energy efficiency programs
7 through this program. PECO is providing a comprehensive program through the
8 Income-Eligible Program at no cost to the participant. In addition to removing the cost
9 barrier, PECO is working to develop a way to do virtual heating assessments in order
10 to limit in-person contact between the CSP and participant.

11 Q. IS THE INCOME-ELIGIBLE PROGRAM COST-EFFECTIVE?

12 A. The Income-Eligible Program is projected to be cost-effective on its own, with a TRC
13 of 1.09. It is rare for a program that provides no-cost assessments and measures to
14 income-qualified customers to be cost-effective on its own. I applaud the Company's
15 ability to provide a cost-effective program.

16 Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING THE
17 INCOME-ELIGIBLE PROGRAM?

18 A. Yes. I recommend that PECO ensure that it utilizes a methodology to track savings
19 when there is funding leveraged from outside sources, such as LIURP, to avoid
20 double-counting of energy savings. For projects that receive leveraged funding, all
21 measures paid in full by one funding source should be allocated to that funding source.
22 If a measure is funded by both programs, the energy savings should be allocated based
23 upon the amount paid by each funding source. For illustrative purposes, if a home
24 receives a \$4,000 heat pump, of which the Income-Eligible Program funds \$2,500 of
25 the measure and the LIURP funds the remaining \$1,500, then the Income-Eligible

1 Program would recognize 63% of the energy and demand savings and the LIURP
2 would recognize 37% of the energy and demand savings.
3

4 **V. HOME ENERGY REPORTS PROGRAMS**

5 Q. PLEASE DESCRIBE THE TWO HOME ENERGY REPORTS
6 PROGRAMS PROPOSED BY PECO.

7 A. PECO is proposing to offer home energy reports programs through two avenues: to
8 residential customers that are not income-eligible and to income-eligible customers
9 under the Residential Home Energy Reports Program and the Income-Eligible Home
10 Energy Reports Program, respectively. Both programs will offer electronic and mailed
11 home energy reports to residential ratepayers which motivate customers to reduce
12 energy consumption by comparing a home's energy usage to neighborhood usage and
13 recommending energy savings measures and tips based on specific energy-usage
14 patterns. Both programs were implemented in Phase III, so there is minimal ramp-up
15 effort needed to continue the programs in Phase IV. For the Residential Home Energy
16 Reports Program, the annual participation ranges from 326,400 to 542,200 and is
17 expected to render an average annual energy savings of 22,531 MWh. The Income-
18 Eligible Home Energy Reports Program is estimated to have between 18,900 and
19 30,800 participants, which will render an average annual energy savings of 1,150
20 MWh. Collectively, the two programs are estimated to cost \$13.95 million throughout
21 Phase IV.

22 Q. DO YOU HAVE ANY CONCERNS REGARDING THE OFFERING OF
23 THE HOME ENERGY REPORTS PROGRAMS TO RESIDENTIAL AND
24 INCOME-ELIGIBLE RATEPAYERS?

1 A. Yes. While I commend the Company for only utilizing 3% of its total budget on
2 behavior reports, I have concerns that the savings may be lower than that experienced
3 in Phase III due to the impacts of COVID-19. As a result of COVID-19, more people
4 are working and schooling from their homes, which may limit their ability to reduce
5 energy usage. PECO acknowledges this as a potential hurdle to recognizing the
6 forecasted level of savings and states that it will adjust content accordingly to continue
7 energy savings. However, I do not know if the Company's attempt at changing the
8 content will be successful. Therefore, if the majority of the forecasted energy savings
9 is not recognized in the first year of Phase IV, the Company should consider pausing
10 the Programs until conditions change to support the model of the Programs.

11
12 **VI. PJM FORWARD CAPACITY MARKET**

13 Q. DOES THE COMPANY HAVE PLANS TO NOMINATE PEAK
14 DEMAND REDUCTIONS INTO THE PJM FORWARD CAPACITY
15 MARKET?

16 A. Yes. As detailed in its Plan, the Company will competitively solicit bids from third-
17 party vendors to nominate up to 50 MW of its peak demand reduction as a capacity
18 resource into PJM's FCM. At this time, it is unclear which energy efficiency measures
19 will contribute to the peak demand reduction that is nominated into the FCM. To
20 properly reflect the proceeds and/or penalties for cost recovery, PECO has updated its
21 tariff to clearly show the results of the FCM. Cost recovery will be assigned by the
22 customer class that provides the capacity.

23 Q. DO YOU HAVE ANY CONCERNS REGARDING THE NOMINATION
24 OF PEAK DEMAND REDUCTION INTO THE PJM FCM?

1 A. Yes. There is a concern regarding how underperformance on a peak demand
2 nomination may impact ratepayers, as penalties would be recouped through the Phase
3 IV EEPC from the rate class where demand reductions were not realized. Until there
4 is a penalty assessed, the extent of the impact from a penalty is unclear.

5 Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING PECO'S
6 PARTICIPATION IN THE PJM FCM?

7 A. The Company should file its plan for nominating demand reductions with the
8 Commission. Currently, the Company's approach lacks details, such as which
9 measures will be bid. In addition to providing those details, PECO should identify
10 what delivery year will be the first year it will bid into the PJM FCM and how it will
11 identify which ratepayer class under delivered demand reduction. Furthermore, the
12 Company should identify how it will limit ratepayer exposure to penalties, which
13 could be through the selection of the third-party vendor.⁷ The Company's PJM FCM
14 plan should be filed with the Commission to allow for stakeholders to comment on the
15 plan before PECO begins bidding into the FCM. By filing this plan, it can quell some
16 concerns stakeholders may have about the potential negative impact to ratepayers.

17

18 **VII. CONCLUSION**

19 Q. BASED UPON YOUR REVIEW OF PECO'S PHASE IV PLAN, DO YOU
20 RECOMMEND THE COMMISSION APPROVE THE PLAN?

21 A. Through my review, I determined that the Phase IV plan is in compliance with the
22 Commission's Phase IV requirements and is in the public interest, with some
23 recommendations. As a result, I recommend that the Commission approve PECO's

⁷ In response to OCA-I-2, PECO indicates that it will only accept proposal from vendors who will absorb deficiency penalties.

1 Phase IV plan, subject to the recommendations provided throughout my testimony.

2 Therefore, I propose the Commission adopt, as part of its approval, the following:

3 • PECO should dedicate a portion of its research and development budget for
4 exploring residential measures and program offerings and should continue to
5 innovate its portfolio of residential programs.

6 • If the Residential Home Energy Reports or Income-Eligible Home Energy
7 Reports programs do not render the majority of their projected savings in the
8 first year of Phase IV due to impacts from COVID, PECO should consider
9 pausing the program until conditions improve.

10 • PECO should utilize a methodology to prevent double-counting of savings for
11 programs that leverage outside funding, such as the multifamily portion of the
12 Residential Program and Income-Eligible Program.

13 • The Commission should require PECO to file its plan for nominating demand
14 response into the PJM FCM, which should include the following details:

15 ○ Delivery year for the first nomination;

16 ○ Measures that will provide demand reductions, by customer class;

17 ○ Methodology to determine which rate classes have delivered demand
18 reductions; and

19 ○ Details on how PECO will limit ratepayer exposure to penalties,
20 including a sensitivity analysis of the impact to the Phase IV Energy
21 Efficiency & Conservation Program Charge (“Phase IV EEPC”).

22 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?

23 A. Yes, it does.

**Exhibit SLS-1:
PECO Energy Company Phase IV Implementation Order Compliance
Checklist**

PHASE IV Implementation Order Requirement	Requirement Addressed	Comments
A.1. Recommended: Comprehensive focus on longer-lived, deep savings measures	Yes	PECO states its comprehensive list of programs and comprehensive education will lead to long-term sustainability (See 9.2.1 of plan p.143)
A.2(b) Report consumption reduction (CR) at meter level without line loss factor	Yes	
A.2(c) Achieve at least 15% of CR target (MWh) in each program year for 6/1/2021-5/31/2026 period	Yes	Plan designed to exceed compliance target by 16%, (see Figure 2 & 3, or Table 2 & 3 of plan)
A.2(d) At least 1 comprehensive program for residential and non-residential customers each	Yes	PECO is offering comprehensive opportunities in the residential, non-residential, and income-eligible programs
A.3(1) Specific measures for households at or below 150% of FPIG proportionate to sectors total usage in EDC territory	Yes	
A.3(2) 5.8% minimum of total CR target from low-income sector	Yes	Plan designed to exceed the threshold of 5.8%, or 80,089 MWh. Expects low-income savings to represent 7.1% of Phase IV target (see Direct Testimony of William Supple p.4)
A.4 Report GNI sector savings and highlight how it will be served	Yes	Served through Non-Residential Program - included in the Small & Large C&I rate class (see p.13 & p.108 of plan)
A.5 Consumption Reduction carryover only from Phase III savings allowed if any	No	No carryover
A.7 Annual CR measured using savings approach	Yes	Same requirement as in Phase II and Phase III

B.5 Achieve minimum 15% of PDR (MW) target each program year exclusively through efficiency measures	Yes	Annually, the plan is designed to achieve between 21% and 30% and the overall plan is designed to exceed the five-year compliance target by 28% (see Figure 2 & 3, or Table 2 & 3 of plan)
B.7 No PDR target carryover from Phase III to Phase IV	Yes	No carryover
C.3 Each customer class offered at least 1 program, and programs that include measures for all customer classes	Yes	
D.1 SWE funded by EDC	Yes	PECO has designated \$2.1 million as a temporary estimation for the SWE
D.3 Annual reports to be filed 9/30 each year, include savings for GNI, low income carve out multi-family housing, and for multifamily portfolio	Yes	
E.2(1) Continue NTG research and planning and report both net and gross TRC ratios in plan	Yes	
E.2(2) Plan is cost-effective based on gross TRC ratio	Yes	Overall Plan is cost-effective with a gross TC of 1.14. Residential Program gross TRC of 1.18. Residential Home Energy Reports Program gross TRC of 1.95. Income-Eligible Program gross TRC of 1.09. Income-Eligible Home Energy Reports Program gross TRC of 1.24. Non-Residential Program gross TRC of 1.23. (see Figure 5 of plan)

F.1 Must include final year Phase IV report information for program period by class of customer equal to CR target	Yes	.
G.1 Competitive Bidding for CSP (Commission must comment within 15 days of filing, otherwise approved)	Yes	(Same minimum criteria for review process in Phase IV as in Phase III, EDC can use Phase III CSP competitive bidding process if desired) RFP methods approved by Commission Secretarial Letter issued 8/27/2020 Docket No. M-2020-3020830, RFPs released August 2020 (p.6 of plan), one furth RFP planned for PJM FCM services vendor.
G. 2 Contract approval (Same minimum criteria in Phase IV as used in Phase III)	Yes	
H.1 CSP participation	Yes	Conditions and processes for Phase IV are the same as listed in 7/16/2013 and 5/8/2015 commission orders. PECO's plan is designed as a market-based plan relying on multiple CSPs to implement programs.
I.1(1) Reasonable and prudent cost recovery for plan management up to 2% of EDC total 2006 annual revenue (SWE expense and low-income CR program excluded)	Yes	Cost recovery will occur via the Phase IV EEPC surcharge, which has six calculated charges.
I.1(2) All program costs classified as either incentive or administrative	Yes	
I.1(3) Plan shows at least 50% of all spending allocated to incentives and less than 50% allocated to non-incentive cost categories	Yes	PECO's incentive budget is 57% of total Phase IV plan

I.1(4) Total cost of plan as annual amount rather than full proposed 5-year period	Yes	See Table 4 of plan p.10
I.2(1) Phase IV PDR target met completely with projects installed and funded during Phase IV	Yes	
I.2(2) Phase III budget used to close out program delivery on 6/1/2021 and report measures installed and commercially operable before 5/31/2021	Yes	
I.3 Clear deadlines between measure in-service date and rebate application date included on all rebate forms and applications	Yes	
I.4 Cost allocated to customer class appropriately, no class excluded from surcharge, and used general cost of service principles for administrative costs	Yes	
I.5 Nominate portion of expected peak demand savings into PJM FCM	Yes	Plans to bid up to 50 MW of PDR from portfolio into PJM FCM in later years of Phase IV. PECO will issue an RFP to select a vendor to review its portfolio and bid into the market (see p.11 of plan)
I.6(1) Include proposed CR tariff mechanism	Yes	See section 7.5.1 of plan for overview of cost recovery mechanism (p.136)
I.6(2) Annual surcharge based on projected program costs over surcharge application year	Yes	See p.137, attached tariff, or Direct Testimony of Richard Schlesinger p.9 and p.11)
I.6(3) No interest levied on over or under recoveries and PJM FCM proceeds/penalties carried through	Yes	See Direct Testimony of Richard Schlesinger p.8, p.10, and p.12. See also Section 7.7 of plan (p.138)

<p>I.6(4) On 6/1/2021 reconcile total actual recoverable plan expenditures and revenues incurred through 3/1/2021</p>	<p style="text-align: center;">Yes</p>	<p>See Direct Testimony of Richard Schlesinger p.12</p>
<p>I.6(5) As part of calculation for Phase IV rates, included clear separate line items for projections of expenses to finalize Phase III contracts, finalize any measures installed and commercially operable before 5/31/2021, and any other Phase III administrative obligations.</p>	<p style="text-align: center;">Yes</p>	<p>See Direct Testimony of Richard Schlesinger p.12, or See p.137 Section 7.5.2 of plan</p>
<p><i>Note: Numbering is direct reference to the Commission Implementation Order adopted June 18, 2020 Docket No. M-2020-3015228</i></p>		

ATTACHMENT A

**QUALIFICATIONS OF
STACY L. SHERWOOD**

STACY L. SHERWOOD

Ms. Sherwood is an Economist at Exeter Associates, Inc. At Exeter, Ms. Sherwood develops utility service assessments, provides bill and rate analysis, and assesses and evaluates the effectiveness of energy conservation and efficiency programs and smart meter implementation plans. She also conducts analysis on renewable energy initiatives and life-cycle cost analysis of renewable energy projects. Prior to joining Exeter, Ms. Sherwood worked on energy efficiency with the State of Maryland.

Education

B.A. (Economics, Business, and Accounting) – McDaniel College, 2009

Previous Employment

2013-2015	Assistant Director Maryland Public Service Commission Baltimore, Maryland
2011-2013	Regulatory Economist II Maryland Public Service Commission Baltimore, Maryland
2009-2011	Regulatory Economist I Maryland Public Service Commission Baltimore, Maryland

Professional Experience

Ms. Sherwood's work at Exeter is primarily related to energy efficiency, renewable energy, automated metering infrastructure, cost recovery, and revenue requirements. Ms. Sherwood has successfully worked with utilities, state energy offices, attorney general's offices, consumer advocates, and commission staffs. Ms. Sherwood provides ongoing support to the Arkansas Office of the Attorney General and the Pennsylvania Office of Consumer Advocates regarding their respective states' utility energy efficiency programs, including analysis of utility energy efficiency plans and proposed plan amendments; analysis of issues raised during stakeholder meetings; review of riders and surcharges related to cost-recovery; and provide recommendations on technical and policy-related matters. She has contributed to several publications issued by the Maryland Power Plant Research Program regarding electricity in Maryland, including load forecasting, analysis of policy impacts, and inclusion of renewable resources. Additionally, Ms. Sherwood has worked with the Department of Defense to study the demand response potential at various Army Garrisons throughout the United States by conducting on-site visits and performing analysis of electric bills.

At the Maryland Public Service Commission, Ms. Sherwood performed analysis on the EmPOWER Maryland energy efficiency and demand response programs, the Exelon Customer Investment Fund, and served as lead analyst for the EmPOWER Maryland limited income programs implemented by the Maryland Department of Housing and Community Development. For those initiatives, she developed reporting templates and guidelines; oversaw evaluation, measurement, and verification of program results; and recommended and ensured compliance with policies. Additionally, Ms. Sherwood assisted with the development of regulations proposed before the Commission to implement the 2013 Maryland Offshore Wind Energy Act.

Publications and Consulting Reports

Fort Riley Assessment of Utility Contracts and Costs, on behalf of the U.S. Army Installation Management Command and Army Commercial Utilities Program, April 2019 (with Steven Estomin of Exeter Associates, Inc.).

Sierra Army Depot Assessment of Utility Contracts and Costs, on behalf of the U.S. Army Installation Management Command and Army Commercial Utilities Program, March 2019 (with Steven Estomin of Exeter Associates, Inc.).

Fort Riley Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, January 2018 (with Christina Mudd of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).

Fort Gordon Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, June 2017 (with Christina Mudd of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).

Cumulative Environmental Impact Report, on behalf of the Power Plant Research Program, Maryland Department of Natural Resources, December 2016 (with Steven Estomin, Kevin Porter, Rebecca Widiss, and Nicholas DiSanti of Exeter Associates, Inc.; Environmental Resources Management, Inc.; Versar, Inc.; Metametrics, Inc.; Spectrum Environmental Services, Inc.; and RGM Incorporated).

Long-Term Electricity Report for Maryland, on behalf of the Power Plant Research Program, Maryland Department of Natural Resources, December 2016 (with Steven Estomin, Kevin Porter, Rebecca Widiss, Nicholas DiSanti, Cali Clark, and Laura Miller of Exeter Associates, Inc.).

Fort Stewart Assessment of Demand Response Opportunities, on behalf of the U.S. Army Office Chief of Staff for Installation Management, September 2016 (with Christina Mudd and Felipe Salcedo of Exeter Associates, Inc. and Jim Clark of Clark Energy, Inc.).

Edwards Air Force Base Feasibility of a Geothermal Project, on behalf of the U.S. Air Force Civil Engineer Center, April 2016 (with Christina Mudd and Kevin Porter of Exeter Associates, Inc.).

Expert Testimony

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020919
Pennsylvania Public Utility Commission v. Audubon Water Company, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Pending)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020256
Pennsylvania Public Utility Commission v. City of Bethlehem – Water Department, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Pending)

Before the Louisiana Public Service Commission, Docket No. U-35456 *Application for Certification of a Replacement Advanced Metering System and Approval of Related Financing*, November 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Pending)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3019612
Pennsylvania Public Utility Commission v. Reynolds Disposal Company, October 2020, for the Pennsylvania Office of Consumer Advocate. Participated in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3010955
Pennsylvania Public Utility Commission v. City of Lancaster – Sewer Fund, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008208
Pennsylvania Public Utility Commission v. Wellsboro Electric Company, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008209
Pennsylvania Public Utility Commission v. Valley Energy, Inc., October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008212, *Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg, PA*, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009559, *Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Wastewater Division*, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009567, *Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Water Division*, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008947, *Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Water Division*, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008948, *Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Wastewater Division*, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3006904, *Pennsylvania Public Utility Commission v. The Newtown Artesian Water Company (Supplement No. 136 to Tariff Water – Pa. P.U.C. No. 9)*, March 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3006814, *Pennsylvania Public Utility Commission v. UGI Utilities, Inc – Gas Division (Utility Code 123100, Filed Tariff Gas- Pa. P.U.C. Nos. 7 and 7S)*, January 2019, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of its proposed consolidated natural gas energy efficiency plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2018-3004144, *Petition of UGI Utilities, Inc. – Electric Division for Approval of Phase III of its Energy Efficiency and Conservation Plan*, August 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001307, *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Wastewater (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001306, *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Water (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. P-2015-2497267, *Petition of Duquesne Light Company for Approval of its Smart Meter Procurement and Installation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the inclusion of additional costs related to the Plan's implementation.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2477174, *Petition of UGI Utilities, Inc. – Electric Division for Approval of Phase II of its Energy Efficiency and Conservation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515642, *Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515375, *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Public Utilities Commission of Rhode Island, Docket No. 4595, *Newport Water Division – Rate Application to Collect Additional Revenues of \$1,304,595 for a Total Cost of Service of \$20,151,440*, December 2015, on behalf of the Division of Public Utilities and Carriers. Testified regarding reasonableness of the overall rate revenue increase.

Before the Maryland Public Service Commission, Case No. 9311, *In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates For the Distribution of Electric Energy*, April 2013, on behalf of the Maryland Public Service Commission Staff. Testified regarding the inclusion of advanced metering infrastructure meters and energy advisor and engineer positions in rates.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
for Approval of Act 129 Phase IV Energy : Docket No. M-2020-3020830
Efficiency and Conservation Plan :

VERIFICATION

I, Stacy L. Sherwood, hereby state that the facts set forth in my Direct Testimony, OCA Statement 1, are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: January 14, 2021
*302397

Signature:



Stacy L. Sherwood

Consultant Address: Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044-3575

Via electronic service only due to Emergency Order at Docket No. M-2020-3019262

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for	:	M-2020-3020830
Approval of its Act 129 Energy Efficiency and	:	
Conservation Plan	:	

**INTERIM ORDER
ADOPTING JOINT STIPULATION FOR ADMISSION OF EVIDENCE AND
ADMITTING EVIDENCE INTO THE RECORD**

By Notice issued January 19, 2021, an evidentiary hearing in this matter was scheduled for February 5, 2021.

On February 4, 2021, PECO Energy Company (PECO or Company), the Office of Consumer Advocate (OCA), the Office of Small Business Advocate (OSBA), the Coalition for Affordability Utility Services and Efficiency in Pennsylvania (CAUSE-PA), the Industrial Energy Consumers of Pennsylvania (IECPA), the Tenant Union Representative Network (TURN), the Natural Resources Defense Council (NRDC), and the Philadelphia Area Industrial Energy Users Group (PAIEUG), all parties in the above-captioned proceeding (hereinafter collectively referred to as the Stipulating Parties), filed a “Joint Stipulation for Admission of Testimony, Exhibits, and Certain Responses to Discovery” (Joint Stipulation) in the above-captioned proceeding. The Joint Stipulation included Attachment 1, which is a two-page document consisting of a chart of statements, exhibits, and discovery responses. The Joint Stipulation and its Attachment 1 are attached to this Order as Attachment A.

Each of the Stipulating Parties stipulated to the authenticity of the statements, exhibits, and discovery responses listed in the Joint Stipulation’s Attachment A, waived cross-examination, and requested that the statements, exhibits, and discovery responses listed in the Joint Stipulation’s Attachment A be admitted into the record in this case.

By Notice dated February 4, 2021, the evidentiary hearing was cancelled.

As this request is reasonable, it will be granted.

THEREFORE,

IT IS ORDERED:

1. That the Joint Stipulation, filed on February 4, 2020, is hereby adopted.
2. That the testimonies and exhibits listed in the Joint Stipulation's Attachment A are admitted into the record of this proceeding on the terms and conditions set forth in the Joint Stipulation as if the same were fully set forth in this ordering paragraph.
3. That, by **4:00 p.m. on February 12, 2021**, the parties shall file the admitted evidence, with appropriate verifications, with the Commission's Secretary's Bureau pursuant to 52 Pa.Code § 5.412a.
4. That the parties shall, when filing their evidence pursuant to Ordering Paragraph 3, include in each filing: (a) a copy of this Order, and (b) a cover letter referencing the caption and Docket Number of this proceeding, the specific evidence included in the filing, and the fact that the evidence included in the filing is "admitted evidence."

Date: February 8, 2020

/s/
Emily I. DeVoe
Mark A. Hoyer
Administrative Law Judges

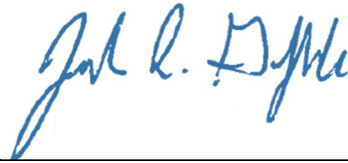
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS : **DOCKET NO. M-2020-3020830**
ACT 129 PHASE IV ENERGY :
EFFICIENCY AND CONSERVATION :
PLAN

**JOINT STIPULATION FOR ADMISSION OF TESTIMONY, EXHIBITS AND
CERTAIN RESPONSES TO DISCOVERY**

The undersigned, being all of the parties to this proceeding: (1) stipulate the authenticity of the statements, exhibits and discovery responses listed in Attachment 1 to this Stipulation (the “Listed Statements, Exhibits and Discovery Responses”), which were previously served upon all parties in this proceeding and, with regard to statements and exhibits, upon presiding Deputy Chief Administrative Law Judge Mark A. Hoyer and Administrative Law Judge Emily I. DeVoe; (2) acknowledge and agree that they waive cross-examination of the witnesses whose testimony is included in the Listed Statements, Exhibits and Discovery Responses; and (3) further stipulate that the Listed Statements, Exhibits and Discovery Responses should be admitted into the record in this case.

Stipulated and agreed this 4th day of February, 2021.



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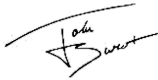
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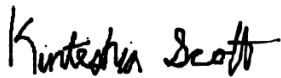
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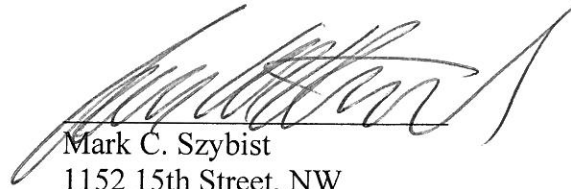
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ATTACHMENT 1

STATEMENTS, EXHIBITS AND DISCOVERY RESPONSES FOR ADMISSION INTO THE EVIDENTIARY RECORD

Witness	Direct & Supplemental Direct Testimony	Exhibits	Rebuttal & Supplemental Rebuttal Testimony	Exhibits	Discovery Responses
PECO					
Doreen L. Masalta	PECO St. 1				
Nicholas DeDominicis	PECO St. 2	PECO Exhibit No. 1	PECO St. 2-R PECO St. 2-SR	Exhibit ND-1 Exhibit ND-2 Exhibit ND-3 Exhibit ND-1SR	PECO Response to PAIEUG-I-5 PECO Response to PAIEUG-I-6
William R. Supple	PECO St. 3	Exhibit WRS-1			
Richard A. Schlesinger	PECO St. 4	Exhibit RAS-1 Exhibit RAS-2 Exhibit RAS-3 Exhibit RAS-4			
CAUSE-PA					
Jim Grevatt	CAUSE-PA St. 1 CAUSE-PA St. 1-SD	Attachment A Attachment B			

Witness	Direct & Supplemental Direct Testimony	Exhibits	Rebuttal & Supplemental Rebuttal Testimony	Exhibits	Discovery Responses
OCA					
Stacy L. Sherwood	OCA St. 1	Exhibit SLS-1 Attachment A			
NRDC					
Alice Napoleon & Courtney Lane	NRDC St. 1	Exhibit AN/CL-1 Exhibit AN/CL-2 Exhibit AN/CL-3			

M-2020-3020830 - PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS ACT 129 PHASE IV ENERGY EFFICIENCY AND CONSERVATION PLAN

Revised 1/26/21

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