Duquesne Light Company – Phase V Energy Efficiency and Conservation Plan

Docket No. M-2025-3057325

December 1, 2025

Contents

Table of Acronyms

Acronym/Term	Definition
AMI	Advanced Metering Infrastructure
BRA	Base Residual Auction
CEEP	Large Commercial Energy Efficiency Program
CHP	Combined Heat and Power
CPM	Contract Program Manager
CSP	Conservation Service Provider
DOE	United States Department of Energy
EDC	Electric Distribution Company
EE&C	Energy Efficiency and Conservation
EM&V	Evaluation, Measurement, and Verification
FPG	Federal Poverty Guidelines
HVAC	Heating, Ventilation, and Air Conditioning
IEAG	Income Eligible Advisory Group
IEEP	Large Industrial Energy Efficiency Program
LI-BEEP	Low-Income Behavioral Energy Efficiency Program
LIHEAP	Low-Income Home Energy Assistance Program
LIURP	Low-Income Usage Reduction Program
LI-WHRP	Low-Income Whole House Retrofit Program
Low-to-Moderate Income Customer	Customers at 151% to 225% of the Federal Poverty Guidelines
NAICS	North American Industry Classification System

Acronym/Term	Definition
NGDC	Natural Gas Distribution Company
OMP	Residential Online Marketplace Program
On-Peak Demand (kW)	Demand reductions during Non-Holiday Weekdays; 2-6 PM during June, July, and August; 7-9 AM and 6-8 PM during January and February
PCPP	Project Commitment Progress Payment
PDE	Pennsylvania Department of Education
Phase V EE&C Plan	Duquesne Light's Energy Efficiency and Conservation Plan for Act 129 Phase V submitted on November 30, 2025
PMP	Program Management Plan
PJM	Pennsylvania-Jersey-Maryland Interconnection LLC
PMRS	Program Management and Reporting System
POS	Point of Sale
PPUC	Pennsylvania Public Utility Commission
Program Year	June 1st through May 31st
RARP	Residential Appliance Recycling Program
R-BEEP	Residential Behavioral Energy Efficiency Program
REEP	Residential Energy Efficiency Programs
RFP	Request for Proposal
RMIP	Residential Midstream Incentives Program
SNEEP	Small-Medium Nonresidential Energy Efficiency Program
SOW	Statement of Work
SWE	Statewide Evaluator
TRM	Technical Reference Manual

Table of Figures

Note: If any of your answers require you to disclose what you believe to be privileged or confidential information, not otherwise available to the public, you should designate at each point in the EE&C Plan that the answer requires you to disclose privileged and confidential information. Explain briefly why the information should be treated as confidential. You should then submit the information on documents stamped "CONFIDENTIAL" at the top in clear and conspicuous letters and submit one copy of the information under seal to the Secretary's Office along with the EE&C Plan. In addition, an expunged copy of the filing should also be included with the EE&C Plan. If someone

requests to examine the information, or if Commission staff believes that the proprietary claim is frivolous or otherwise not justified, the Secretary's Bureau will issue a Secretarial Letter directing that the EDC file a petition for protective order pursuant to 52 Pa. Code § 5.423.

Energy Efficiency and Conservation Plan

A. Transmittal Letter - with reference to statutory and regulatory requirements and Electric Distribution Company (EDC) contact that PA PUC should contact for more information.

B. Table of Contents - including lists of tables and figures.

C. Table of Acronyms – include definitions of any acronyms used in the plan.

D. Mapping of Program Years to Dates – show table identifying the start and end dates of all program years.

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

This EE&C plan template reflects Commission guidance issued in previous Act 129 Orders. Specifically:

- Phase V Implementation Order. Docket No. M-2025-3052826. Entered June 18, 2025. Weblink (henceforth referred to as "2025 IO"
- Phase 1 Implementation Order. Entered January 16, 2009. Docket No. M-2008-2069887.Weblink (henceforth referred to as "2009 IO")
- 2026 TRC Test Final Order. Docket No. M-2024-3048998. Entered Novembers 7, 2024.Weblink (henceforth referred to as "TRC Test Order")
- 2026 Technical Reference Manual Final Order. Docket No. M-2023-3044491. Entered September 12, 2024. Weblink (henceforth referred to as "TRM Order")

1. Overview of Plan

(The objective of this section is to provide an overview of the entire plan)

1.1. Summary description of plan, plan objectives, and overall strategy to achieve energy efficiency and conservation goals.

Pursuant to Act 129 of 2008 ("Act 129"), the Pennsylvania General Assembly charged the Pennsylvania Public Utility Commission ("PUC" or "Commission") with establishing an energy efficiency and conservation program. The energy efficiency and conservation program requires each electric distribution company ("EDC") with at least 100,000 customers to adopt a plan to reduce energy demand and consumption within its service territory. In response to Act 129, on January 16, 2009, the Commission entered an Implementation Order at Docket No. M-2008-2069887 which was utilized in Phase I program planning. On August 3, 2012, the Commission entered an Implementation Order at Docket Nos. M-2012-2289411 and M-2008-2069887 for Phase II program planning. On June 11, 2015, the Commission entered an Implementation Order at Docket No. M-2014-2424864 for Phase III program planning along with a Clarification Order issued on August 20, 2015. On June 18, 2020, the Commission entered an Implementation Order at Docket No. M-2020-3015228 for Phase IV program planning. On June 18, 2025, the Commission entered an Implementation Order at Docket No. M-2025-3052826 for Phase V program planning. The Act requires that by November 30, 2013, and at least every five years thereafter, the Commission shall evaluate the costs and benefits of the program. Based upon findings of the Statewide Evaluator (SWE) contained in its Market Potential Study[1], the Commission determines that the benefits of a Phase V Act 129 program will exceed the costs and therefore proposes to adopt additional required incremental reductions in consumption for another Energy Efficiency and Conservation Plan ("EE&C" or "Plan") program term.

In the June 18, 2025, Implementation Order, the Commission adopted the percentage reduction targets recommended by the SWE. Duquesne Light Company's ("Duquesne Light" or "Duquesne" "DLC" or the "Company"), energy consumption reduction target for the Phase V five-year energy efficiency consumption is 261,583 MWh and demand reduction target is 46.5 MW. In compliance with the requirements of Act 129 and PUC Orders, Duquesne has used the energy consumption and demand reductions established by the Commission to develop its energy efficiency and conservation plan, which is submitted herewith.

EE&C Plan savings projections for each sector are proportionally aligned with Pennsylvania Act 129 - Phase V Energy Efficiency and Peak Demand Reduction Market Potential Study Report ("Phase V Potential Study" or "Potential Study") Tables 48, 50 and 52 (as well as briefing slides 38 and 49). The forecast values themselves were changed to match the amount in the Commission's Phase V Implementation Order. The Potential Study identifies Duquesne Lights's Act 129 Potential at page 52 setting the target 287,700 MWh that includes traditional EE and adders Solar and CHP. The Implementation Order[2] set the portfolio target 261,583 MWh and

[1] Energy Efficiency Potential Study for Pennsylvania, NV5, February 7, 2024.
[2] Energy Efficiency and Conservation Program Implementation Order, Docket M-2025-3052826, Table 2: Final Phase V Targets, by EDC, page 12.

46.5 MW. The EE&C Plan is designed to achieve 5% over the Implementation Order requirements.

1.2. Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the EDC's process for stakeholder engagement during both the development and implementation of the EE&C plan.

In developing this plan, Duquesne Light prioritized affordability for customers and committed to continuous evaluation to ensure the cost-effective delivery of energy efficiency goals. Additionally, the Phase V Plan emphasizes consolidation of program offerings where feasible, reducing redundancies and aligning resources to maximize impact and streamline administration. Duquesne Light's Phase V EE&C Plan development process is summarized below.

Duquesne Light developed the Phase V Plan in partnership with implementation providers to leverage industry expertise and streamline the transition from Phase IV. Following the release of the Phase V Implementation Order, Duquesne Light issued six (6) competitive solicitations to affect implementation of five program types: (1) Residential market rate and Low-Income programs, (2) Behavioral Programs, (3) Midstream Programs (e.g., Medium-Small Nonresidential Midstream and Residential Midstream Programs), (4) Small-Medium Nonresidential and Large Commercial sectors and (5) Large Industrial sector efficiency program. Solicitation (6) was for Evaluation, Measurement and Verification ("EM&V"). Duquesne Light's Phase V EE&C Plan development process is summarized below.

Duquesne Light will evaluate existing programs for potential integration where they align with our objectives and regulatory requirements. In addition, DLC will explore resource adequacy initiatives that enhance grid resiliency and support our long-term vision of delivering clean, reliable energy for all customers. These efforts will include assessing emerging technologies, leveraging data-driven insights to optimize performance, and identifying opportunities for collaboration with key stakeholders. By prioritizing innovation and sustainability, DLC aims to strengthen system reliability, reduce environmental impact, and ensure equitable access to energy solutions across our service territory.

1) Measure content and projected mix

The EE&C Plan forecast measure detail is directly linked to Conservation Service Provider (CSP) responses to competitive solicitations issued by Duquesne Light for the design and implementation of the programs presented in this Plan. Accordingly, the measure mix was taken from proposals selected based on CSP expertise and innovation. Phase V Plan measures (See Section 11, Table 8) were reconciled with content of the 2026 Technical Reference Manual (TRM) and information provided in the SWE saturation studies and potential forecast.[3] Measure savings impact, cost and benefit.

[3] Ibid.

Measure deemed savings were updated consistent with the 2026 TRM. Measure costs were documented using the SWE incremental costs database[4], contractor values, EDC research and specific measure cost web research. Incentive amounts were established starting with baseline assumptions applied in the Phase V Potential Study. These were adjusted based upon historic incentives provided by Duquesne Light, the other six Pennsylvania EDCs, escalated for the Phase V performance period and adjusted as required to achieve budgetary requirements. Avoided cost assumptions were updated consistent with the Total Resource Cost Test (TRC) Order[5] utilizing output from the Avoided Cost Calculator consistent the 2026 TRC Test Final Order[6] these values are applied to render measure, program, portfolio and Plan level cost-effectiveness as expressed by the TRC ratio.

2) Program definition

Programs were defined based upon delivery channels within each customer sector. Duquesne Light worked with CSPs to establish program definitions.

Residential sector programs will employ proven successful appliance recycling, online marketplace and midstream engagement channels. Under-served, income qualifying customers receive on-site and or virtual energy assessments, customer education, direct-install and comprehensive energy saving measures.

Nonresidential Sector Programs: The Small-Medium Nonresidential Customer Energy Efficiency Program (C&I customers with a monthly max billing demand of less than 300 kW over the prior 12 months) provides direct-install, downstream and midstream incentive engagement channels were successful in Phase IV and are continued in Phase V. Large Commercial and Industrial customer programs (for C&I customers with a monthly max billing demand ≥ 300 kW over the prior 12 months) provide proven down-stream audit services and measure incentives both prescriptive and custom tailored to site-specific needs.

The Public Agency Partnership (PAPP) was implemented directly by Duquesne Light in Act 129 Phases I, II and III, is brought back for Phase V. No longer a regulatory "carve-out" the program provides successful strategies to overcome GNI sector[7] barriers to program participation. The programs are discussed in more detail below.

3) Portfolio/Program Goals and Funding

Program goal allocation and associated program budgets were designed based upon the SWE Energy Efficiency Potential Study and adjusted to accommodate the Commission's Implementation Order, which required segment carve-outs for the low-income segment and specified program comprehensiveness requirements.[8] Goal allocation for the remaining customer

[4] Ibid.
[5] PA PUC 2026 Total Resource Cost Test Order, November 7, 2024, at Docket No. M-2024-3048998.
[6] TRC Test Order Exhibit H., subsection 1. 2026 Avoided Cost Calculator (ACC).
[7] Governmental, Nonprofit, Institutional (GNI), Act 129 of 2008 Section 2806/11(C)(1)(i)(C) identifies "Federal, State and local government, including municipalities, school districts, institutions of higher education and nonprofit entities" as GNI.
[8] Ibid.

segments was based on segment energy use, as well as requirements to achieve mandated reductions at authorized budgets.

1.3. Summary tables of portfolio savings goals, budget and cost-effectiveness (see Tables 1, 2, 3 and 4 of the EE&C Template Tables Excel Workbook). Introduce Table 2 with high-level overview of Act 129 energy accounting (incremental annual, gross vs. net, meter level savings vs. system level savings, weather-normalization of savings estimates, etc.).[9] Introduce Tables 3 and 4 with a summary of the key peak demand accounting elements for Phase V (2025 IO at 147-157).

Table 2: Summary of Portfolio Energy Savings shows Market Rate Sector, Low-Income sector, Small C&I and Large C&I sector incremental and cumulative energy savings and demand reductions. Gross versus Net is not discussed at Tables 2-4 and can only be found in Table 14.

Table 4 requires the combination of EE demand reduction with load shifting demand reductions in an effort to assemble and test annual and Phase performance period demand impacts. The format of the imposed form appears to be testing whether and if performance-period demand reductions meet minimal seasonal impacts of 75 percent of reported demand reductions and purports to measure annual 15% impact minimums. This approach combines what are 5-year average DR impacts with incremental annual EE demand reductions that are two very different values This form serves to document Phase-period demand reductions with seasonal impacts.

Please see Section 11: Tables for Pennsylvania EDC Energy Efficiency and Conservation Plan.

1.4. Summary of program implementation schedule over the five-year plan period. Utilize the Mapping of Program Years to Dates table above to align calendars with Act 129 program years.

Please see Section 12: Program Schedules and Milestones

1.5. Summary description of the EDC implementation strategy to acquire at least 15% of its consumption reduction and peak demand reduction target in each program year.

Duquesne Light's Phase V EE&C Plan includes programs that are being continued as previously implemented, modified based on previous years' experience implementing them, and newly added programs. These programs have forecast "ramp-rates" projecting estimated saving impacts across the five-year Phase V performance period as shown in Figure 1: Program Ramp-Rates. As shown the Plan provides for acquiring at least 15% of the consumption target in each of the Phase V program years.

[9] Tables referenced in the template are found in Section 11.

Figure 1: Program Ramp-Rates

Sector	Program	2026	2027	2028	2029	2030	Total
Residential	Appliance Recycling	16.4%	18.0%	19.8%	21.8%	24.0%	100.0%
	Low Income Energy Efficiency	19.6%	19.8%	20.0%	20.2%	20.4%	100.0%
	Residential Midstream Efficiency	18.7%	19.8%	20.1%	20.5%	20.9%	100.0%
	Residential Online Marketplace	19.4%	19.7%	20.0%	20.3%	20.6%	100.0%
	Residential Behavioral (HERs)	19.2%	22.5%	22.8%	19.2%	16.2%	100.0%
	Low Income Behavioral (HERs)	31.0%	16.7%	16.7%	16.7%	19.0%	100.0%
Small/Medium C&I	Small/Medium Nonresidential	16.7%	18.6%	21.2%	23.7%	19.8%	100.0%
Large Commercial	Large Commercial Efficiency	15.0%	17.5%	22.5%	27.5%	17.5%	100.0%
Large Industrial	Large Industrial Efficiency	10.3%	17.3%	22.1%	24.0%	26.3%	100.0%
Governmental/Nonprofit	Public Agency Partnership	18.0%	22.0%	23.0%	22.0%	15.0%	100.0%
	Total Portfolio	15.6%	18.8%	21.7%	23.4%	20.6%	100.0%

1.6. Summary description of the EDC implementation strategy to acquire at least 75% of the portfolio MW compliance target in each season (2025 IO at 142). If an alternative summer or winter performance window is proposed for daily load shifting programs, provide a rational for the alternative window. If the proposal calls for differentiated windows based on local distribution system needs, summarize the proposed taxonomy and prepare a supplemental table that maps distribution assets or transmission zones to peak demand performance windows. (2025 IO at 154).

The proposed EE&C Plan is developed to provide necessary minimum summer or winter demand reductions minimums (75%) of total demand reduction impacts through its proposed measure mix. Duquesne believes this is an appropriate area of concern and is expected to be a challenge. It is a unique requirement not seen or tested before, just the Phases I and II impact measurement requirements (top 100 hours) and the Phase III impact measurement requirement (dispatch triggered by 96% for PJM forecast peaks) were novel. Duquesne Light will monitor Summer and Winter demand reductions at the measure, project, program and portfolio levels. Duquesne Light includes in its forecast measures and measure impacts resource adequacy measures.[10] Duquesne Light plans these impacts so as to render 5-years of averaged impacts to increase the probabilities of meeting the newly imposed requirement.

[10] Resource adequacy measures include, but are not limited to, active managed charging, behavioral demand response, TOU rates, direct load control programs for AC, water heater, etc., smart thermostat, smart panel, battery storage as well as font of the meter measures.

1.7. Summary description of the EDC implementation strategy to manage EE&C programs and engage customers and trade allies.

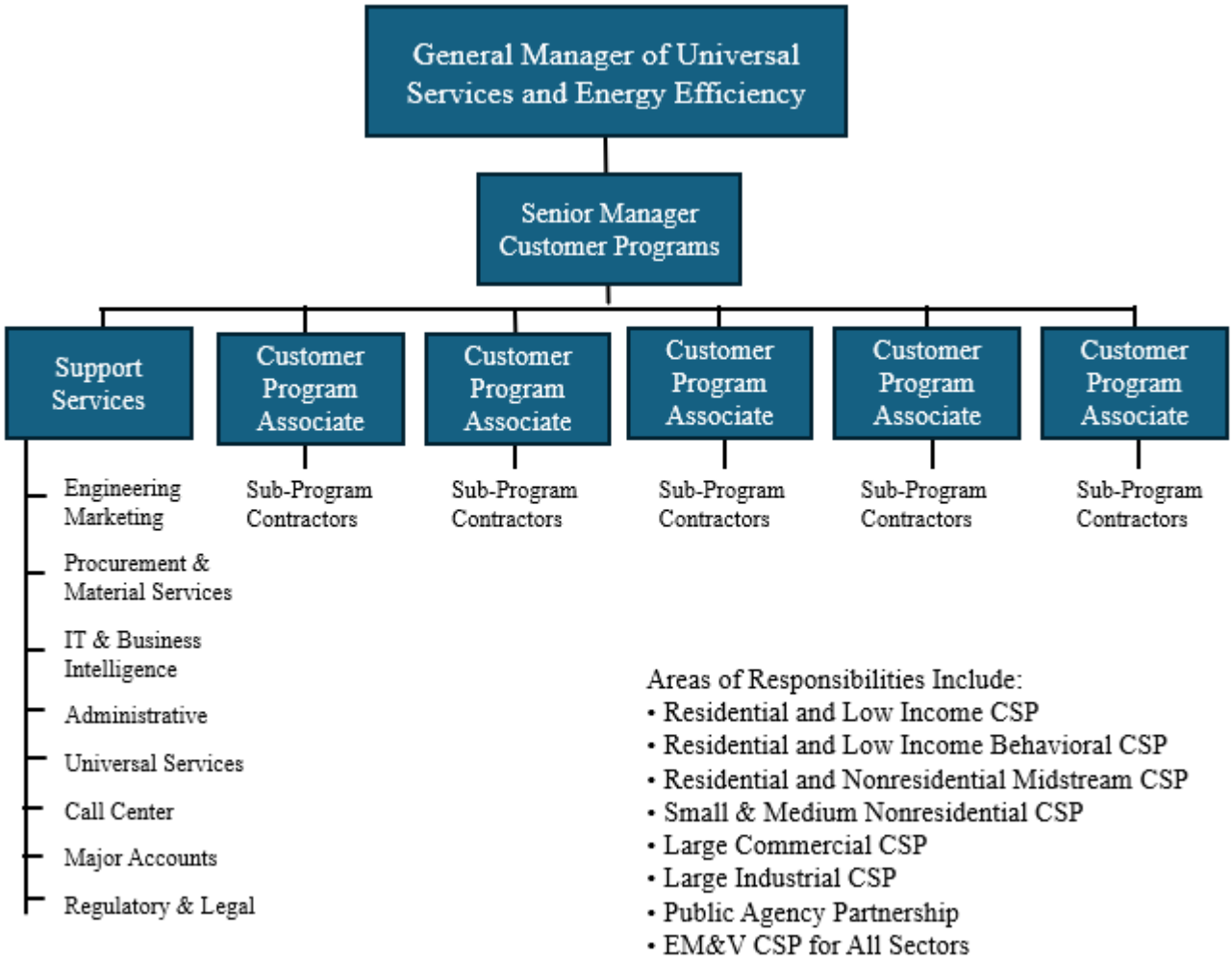
Duquesne Light delivers programs efficiently by combining internal resources with specialized contractors. Contractors and subcontractors handle implementation under agreements with Duquesne Light, while overall responsibility for meeting goals remains with Duquesne Light.

Phase V programs will be executed by CSPs with Duquesne Light providing oversight and support. Success will require careful planning, coordination, and integration into a unified operation. Clear procedures, documentation, and data systems will be maintained. This collaboration will involve CSPs, contractors, trade allies, and Duquesne Light working together.

Customers will be engaged through at least three channels. First, Duquesne Light promotes programs directly to its customers through marketing approaches such as mass media advertising, direct marketing, direct contact, events, conferences, account representatives and electronic media. Second, Duquesne Light will work with CSPs that have similar outreach responsibilities to ensure a consistent message with a specific focus on securing commitments for customers to participate in the programs. Third, Duquesne Light and its CSPs will provide information on its programs to trade allies, such as builders, architects, engineers, vendors, equipment installation contractors, retailers and others, with the objective of securing their willingness to participate and encourage their customers and clients to participate. Trade allies are engaged primarily through direct marketing, events, conferences and account representatives.

Energy efficiency is implemented under customer programs at Duquesne Light and is housed within the customer service department under the revenue management and organizational transformation function. The department's size and function are driven by the portfolio of programs offered. The size and structure also reflect the use of contractors and subcontractors. The organization is headed by one senior manager who reports to the General Manager of Universal Services and Energy Efficiency. The senior manager is responsible for the planning and implementation of the energy efficiency and conservation program. The senior manager is supported by several sector or segment specific customer program associates. There also is support staff for functions including engineering, marketing, data processing, regulatory and contract management. The organizational chart pictured below represents the structure of the organization to implement the energy efficiency and conservation plan.

Figure 2: Customer Programs Organizational Chart



1.8. Summary description of EDC's data management, quality assurance and evaluation processes; include how EE&C programs will be updated and refined based on evaluation results and plans for secure data sharing with other program administrators.

Data Management: All energy efficiency project activities are tracked and recorded in the Program Management and Reporting System (PMRS). When projects are established, PMRS assigns project numbers that are linked to Duquesne Light's customer information and billing system by customer service agreement identification number. Hard and electronic copy project files are organized and filed by PMRS project number. Data elements tracked in PMRS include customer data, project and measure data; energy and demand savings; as well as financial rebate and, as applicable, CSP performance payment data. Measure level data contain applicable baselines, as well as proposed and installed measure definition to support claimed savings for measures listed in Section 11, Table 8. PMRS data extraction supports all program reporting as well as evaluation measurement and verification sampling.

Quality Assurance: (A more detailed description of quality assurance is provided under Section 6.) All CSPs under contract to implement Duquesne Light energy efficiency programs are required by contract statements of work to provide a Program Management Plan ("PMP"). The PMP presents the program rationale, assumptions, approach, processes to include policies and procedures, production plan, marketing plan, performance metrics and quality assurance plan.

Procedures are in place to ensure prospective projects receive appropriate and consistent review prior to approval and incentive payment processing. This ranges from minimal residential measure rebate application processing to extensive commercial and industrial (C&I) project development and customer incentive processing. C&I incentive processing varies significantly depending on project type and size. A project review flow chart and project file content requirements are addressed in Section 6.

Evaluation Process: Projects and measure reported savings are verified pursuant to the Duquesne Light Evaluation Measurement and Verification (EM&V) Plan. The EM&V Plan ensures customer projects are verified using a systematic process that is consistent with the Statewide Evaluator's (SWE) Audit Plan and Evaluator's Framework for Pennsylvania Act 129 Energy Efficiency and Conservations Programs (Audit Plan). The Duquesne Light EM&V Plan specifies sample plans and applicable verification rigor consistent with the Audit Plan and is vetted with and approved by the SWE.

Program Refinements: Program refinement is continuous, resulting from experience gained through program implementation and adherence to quality assurance procedures described above. Augmenting internal process improvements, programs and processes are subject to program implementation process evaluations performed by an independent EM&V contractor.

Additionally, customer and stakeholder input are solicited during regularly scheduled Act 129 EE&C Program stakeholder meetings. Changes to programs will be requested through the applicable Commission process, if necessary. The Company will also monitor and report on all existing programs at its stakeholders' meetings.

Duquesne Light will evaluate requests for custom measure rebates on the case-by-case basis to determine cost effectiveness and energy savings potential. Measures, including combined heat and power ("CHP") projects, distributed energy resources, and microgrids may be considered and approved if found to be cost effective as indicated by the Total Resource Cost ("TRC") score above 1.0, based upon project savings calculated in accordance with the PA Technical Reference Manual ("TRM") standards and proof of positive fuel savings using the Department of Energy endorsed source fuel efficiency models.

1.9. Summary description of cost recovery mechanism.

The Act allows all EDCs to recover on a full and current basis from customers, through a reconcilable adjustment clause under 66 Pa. C.S. § 1307, all reasonable and prudent costs incurred in the provision or management of its plan. The Act also requires that each EDC's plan includes a proposed cost-recovery tariff mechanism, in accordance with 66 Pa. C.S. § 1307, to fund all measures and to ensure full and current recovery of prudent and reasonable costs, including administrative costs, as approved by the Commission. To that end, Duquesne Light has

designed a surcharge and reconciliation mechanism for all customer segments. The surcharge has been designed in a manner that recovers costs of the programs from the customers who have an opportunity to participate in those programs.

The Company has successfully implemented in Phase I, Phase II, and Phase III five surcharges to recover the associated Act 129 costs. As part of the parties' settlement in Phase III,[11] Duquesne Light agreed to combine the surcharges for Small and Medium Commercial and Industrial customers, reducing the total number of EE&C surcharges from five to four: Residential, Small and Medium C&I, Large Commercial, and Large Industrial. The revised plan was filed and approved by the PA PUC resulting in the new surcharge effective June 1, 2020. This surcharge configuration was used throughout Phase IV and is slated to remain for Phase V. The Residential surcharge is designed to recover costs on a cents per kilowatt-hour basis with an annual reconciliation; the charges would be included in the overall distribution kWh rate. The Small and Medium Commercial and Industrial surcharges are also designed to recover costs on a cents per kilowatt-hour basis with an annual reconciliation. The Large Commercial and Industrial surcharges are each designed to recover costs through a combination of a fixed monthly surcharge and a demand-based surcharge with an annual reconciliation. All commercial and industrial customers will have a separate line-item delineation of these charges on the bill.

[11] Refer to the PaPUC Docket M-2015-2515375 Commission Order dated March 10, 2016, regarding the Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase III Plan.

2. Energy Efficiency & Conservation Portfolio/Program Summary Tables & Charts

(The objective of this section is to provide a quantitative overview of the entire plan for the five-year period. The audience will be those who want to see the "numbers", but not all the details.)

2.1. Market Rate Residential (exclusive of Low-Income), Residential Low-Income, Small Commercial & Industrial, and Large Commercial & Industrial Sector Summaries (see Table 6).[12]

See Section 11 below for Table 6.

2.2. Plan data: Costs, Cost-effectiveness and Savings by program, sector and portfolio (see Tables 1-6).

See Section 11 below for Tables 1-6.

2.3. Budget and Parity Analysis (see Table 7). EDC total annual revenue is inclusive of collections on behalf of Electric Generation Suppliers[13] (2009 IO at 35). EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total annual sales should include both bundled and delivery-only sales.

See Section 11 below for Table 7.

[12] A *project* is an activity or course of action involving one or multiple energy efficiency measures, at a single facility or site. A program is a group of projects, with similar characteristics and installed in similar applications. Programs should be organized around a common customer class, technology, end-use, market, or delivery mechanism. The portfolio consists of all the programs in the residential, commercial/industrial small, commercial/industrial large or government/nonprofit/institutional sectors. Residential sector programs include participants with a residential rate schedule. Commercial/Industrial Small sector programs include participants with a small C/I rate schedule. Commercial/Industrial Large sector programs include participants with large C/I rate schedule. Government/Nonprofit/Institutional includes customers in any rate schedule who are Federal, State, Municipal, and Local Governments, as well as school districts, institutions of higher learning, and non-profit entities. The applicable EE&C sector designation is based on a customer's rate schedule not the size of the energy efficiency project or the type of building.

[13] Per the January 16, 2009 Implementation Order, "the Commission interprets 'amounts paid to the [EDC] for generation, transmission, distribution and surcharges by retail customer,' set forth as the definition of EDC total annual revenue in 66 Pa. C.S. § 2806.1(m), to include all amounts paid to the EDC for generation service, including generation revenues collected by an EDC for an EGS that uses consolidated billing." See January 16, 2009, Implementation Order at 35.

3. Program Descriptions

(The objective of this section is to provide detailed descriptions of each proposed program and the background on why particular programs were selected and how they form balanced/integrated portfolios.)

3.1. Discussion of criteria and process used for selection of programs:

Duquesne Light is in its seventeenth year successfully planning and implementing four prior portfolios of energy efficiency programs. The Phase I portfolio was built upon Duquesne Light's own Energy Efficiency and Demand Response Potential Study.[14] Phase II planning benefitted by the SWE's 2012 Market potential Study; the Phase III EE&C Plan incorporated findings of SWE's 2015 Energy Efficiency Potential Study; the Phase IV the EE&C Plan was informed and Guided by the 2020 Energy Efficiency and Demand Reduction Potential Study and in Phase V we are guided by the 2024 Potential Study. Duquesne Light has 17 years of experience implementing programs with claimed savings exceeding all Phase-mandates and reported savings impacts independently verified at 97.6%.

Additional planning and research in preparation for development of the Phase V EE&C Plan includes an October 2024 benchmarking of residential programs, measures and incentive levels that studied programs in Pennsylvania (all EDCs), Illinois, New Jersey, New York, Vermont and Wisconsin. Also, Duquesne Light engaged its Phase IV independent evaluator, Guidehouse, to prepare a Customer Assistance Strategic Assessment Benchmarking effort to better integrate its customer assistance portfolio with Act 129 energy efficiency and demand-response planning. The Strategic Assessment used data-driven segmentation to identify vulnerable and hard-to-reach customers, aligning assistance offerings with cost-effective load management options.

In addition to the planning depth of four potential studies, two benchmarking studies and implementation experience, Duquesne Light's Phase V measure content reflects the 2026 Technical Reference Manual and its predecessors, where applicable. Phase V EE&C Plan program measure mixes are updated to current codes and standards and reflect the measures of successful programs, nationally.

3.1.1. Describe portfolio objectives and metrics that define program success (e.g., energy and demand savings, customers served, number of units installed, market transformation).

Portfolio objectives and metrics are taken from the Phase V Potential Study. The Commission's adoption of the study, and incorporation of study findings as compliance targets, supports Duquesne Light's application of study report findings as an initial planning basis. Adjustments were made based on Duquesne Light's experience with implementing similar programs but generally align with Potential Study projections as shown in the table below:

[14] Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation and Demand Response Plan Docket No. M-2009-2093217, June 30, 2009; Part (3) Energy Efficiency and Demand Side Response Study, MCR Performance Solutions, LLC, June 26, 2009.

Figure 3: Sector Energy Use, Plan Savings and EE Potential

Sector	Energy Use	5-Year Savings MWh	Plan Savings %	P5 Potential Study
Residential	30.9%	83,958	30.6%	34.5%
Smal C&I	25.7%	76,001	27.7%	26.6%
Large Commercial & Industrial	43.5%	114,703	41.8%	38.9%
Total	**100.0%**	**274,662**	**100.0%**	**100.0%**

Given this foundation, the planning process imposed program budget limits consistent with the Act and the Commission's Implementation Order of June 18, 2025. Available funding was first allocated to each major rate class in proportions approximating annual energy consumption, then adjusted based on requirements to achieve the Commission's required reductions in the low-income segment, as well as comprehensive program requirements of the Commission's Implementation Order. Program goal allocations also incorporated demonstrated delivery channel strengths and weaknesses from Phase I, Phase II, Phase III and Phase IV in a balance to achieve reduction mandates given the Commission's funding authorization.

The Act requires certain amounts of the mandated reductions be achieved through programs serving low-income customers. In addition to mandated programs, a portfolio of programs was assembled to penetrate key markets, including hard-to-reach small C&I markets.

Figure 4: Projected Portfolio Savings

Program	Savings MWh	Savings MW
Residential Appliance Recycling	6,126	1.145
Residential Online Marketplace	6,500	3.015
Residential Midstream Incentives	20,000	1.086
Residential Low-Income Energy Efficiency	16,932	6.265
Residential Behavioral Energy Efficiency	30,200	7.050
Residential Low-Income Behavioral Efficiency	4,200	0.890
Small-Medium Nonresidential Efficiency	76,000	11.748
Large Commercial Sector Efficiency	50,000	8.504
Large Industrial Sector Efficiency	40,000	5.329
Public Agency Partnership (GNI)	24,704	3.155
Total Portfolio	**274,663**	**48.2**

3.1.2. Describe how programs were constructed for each sector to provide market coverage sufficient to reach overall energy and demand savings goals. Describe analyses and/or research that were performed (e.g., benchmarking of other jurisdictions, best-practices, requests for information from CSPs).

Program Portfolio Structures:
Energy efficiency potential is forecast based on customer size and building type, along with technology applications available for that type of customer and building. This approach is functional and consistent with industry standard practices. Programs are designed to (1) target identified efficiency gain potential (energy and demand), and (2) address market segment specific needs and barriers. The following chart shows customer sector building categories characterized by the Phase V Potential Study observed in the development of the energy efficiency programs described herein:

Figure 5: Customer Sector Building Stock Categories[15]

Residential		**Small C&I**		**Large C&I**
Single Family (SF)		Small Office		Large Office
SF Low-Income		Small Retail		Large Retail
Multifamily		Small Education – College/University		Large Education – College/University
		Small Education – Other		Large Education – Other
		Small Grocery		Large Grocery
		Small Health – Hospital		Large Health – Hospital
		Small Health – Other		Large Health – Other
		Small Industrial Manufacturing		Large Industrial Manufacturing
		Small Institutional/Public Services		Large Institutional/Public Services
		Small Lodging		Large Lodging
		Small Miscellaneous/Other		Large Miscellaneous/Other
		Small Restaurant		Large Restaurant
		Small Warehouse		Large Warehouse

The programs described in the following sections are developed to address specific market segments or delivery channels.

Residential Revenue Class:
Duquesne Light's project team analyzed residential sector summary actual data for 2007–2025 and forecast data for customer count, energy and demand statistics. Dwelling type and vintage definition was developed by analyzing American Community Survey data for Allegheny and Beaver counties, representative of housing characteristics in Duquesne Light's service area.[16] The analysis supported a proportional allocation of percentages of regional housing stock into single-family, multifamily single-family low-income, and multifamily low-income. The Potential Study projects potential annual GWh savings for Duquesne Light's residential customers by segment of customer and by program potential.

[15] Ibid, footnote 6.
[16] Ibid, footnote 6.

The Phase V Potential Study found that single-family homes have the greatest potential with savings, specifically utilizing whole house programs; although the Potential Study admits that whole house programs may capture some of the savings achieved through space and water heater programs, along with Behavioral Energy Efficiency Reports.

Residential EE&C program planning incorporates energy and demand savings associated with implementing lighting, appliance, heating ventilation and air conditioning, building shell, water heating and other energy efficiency measures shown in Section 11, Table 7 Eligible Measures. Residential sector measures and their energy and demand savings estimates are consistent with the Pennsylvania 2026 Technical Reference Manual (TRM).

Duquesne Light developed plans to launch programs targeting the residential sector including appliance recycling, online marketplace and midstream engagement channels. These initiatives will promote comprehensive and innovative approaches that include heating, cooling, ventilation and air conditioning, high efficiency appliances, resource adequacy measures[17] and a host of building shell insulation and infiltration measures. Resource adequacy measures reduce on-peak loads include networked HVAC controls, time-of-use incentives and other load management approaches.

The Low-Income Energy Efficiency Program (LIEEP) will provide participants with walk-through and comprehensive energy assessments, customer education, direct-install and comprehensive energy saving measures. Duquesne Light will continue to work directly with regional housing authorities to implement cutting edge technology demonstration projects tailored to multifamily housing building types. Duquesne Light will continue to work with its Income Eligible Advisory Group to improve services in this important sector.

In Phase V LIEEP will focus, incorporate and engage community organizations to enroll and engage customers. Organizations include but are not limited to Action Housing, Rebuilding Together Pittsburgh, Beaver County Community Action, United Way, the Urban League of Great Pittsburgh, the Latino Community Center and Bhutanese Community Association of Pittsburgh. Duquesne Light will coordinate its Act 129 LIEEP activities with its Universal Services Low-Income Usage Reduction Program (LIURP) Smart Comfort. This will include engaging one common implementer and synchronized enrollment, service provision and data collection. Comprehensive measures, annunciated in Phase V EE&C Plan Table 8 Addendum, will be promoted and tracked according to this distinction.

Additionally, Duquesne Light will provide two residential behavioral Home Energy Report Programs, one for market rate customers and one specialized for the low-income sector. Behavioral programs continue to be important contributors to residential sector savings impacts. Not only are behavioral programs a gateway program to other programs, they render verified savings in a cost-effective manner. Their Randomized Control Trial (RCT) measurement protocol is broadly accepted as the gold standard in impact measurement, supporting verified attributable impacts.

Small Commercial & Industrial Revenue Class:
Duquesne Light's project team analyzed commercial sector summary actual data for 2007–

[17] See footnote 10 (above).

2025 as well as forecast 2015-2025 customer counts, energy and demand statistics. The project team utilized Phase I, Phase II and Phase III research containing North American Industry Classification System (NAICS) codes for Duquesne Light's larger commercial customers, to identify market segments to assist in directing its marketing efforts within the broader commercial customer sector.

The Phase V Potential Study determined the benefits available to small commercial and industrial customers. The Potential Study determined that the greatest benefits can be found among retail, office, and institutional/public service building types. Unlike the residential sector, the Potential Study forecast the greatest potential savings for small C&I to be found in interior lighting upgrades, followed by cooling and whole building programs.

The Small-Medium Nonresidential Energy Efficiency Program (C&I customers with a monthly max billing demand of less than 300 kW over the prior 12 months) provides direct-install, downstream and midstream incentive engagement channels successful in Phase IV and continued in Phase V. Traditional EE measures include lighting, refrigeration, space heating, cooling and ventilation; water heating, commercial cooking equipment, compressed air system improvements. Additional measures tested in Phase IV will be expanded in Phase V including virtual commissioning and strategic energy management, using whole building impact measurement.

Large Commercial & Industrial Revenue Classes:
The Phase V Potential Study grouped large commercial and large industrial market potential and forecast potential by commercial building type, described in Figure 5 (offices, retail, education, grocery stores, health care etc.) where one line item is labeled "Large Industrial Manufacturing." Industrial sector potential is forecast by industry (chemical manufacturing, primary metals, mining, etc.) where potential is projected as a percentage of process end-use consumption. The Potential Study did not provide an actionable industrial sector forecast.

To affect sector planning Duquesne Light relied on its extensive experience in this sector working with industrial gas, petrochemical manufacturing, primary metals and other large customers, successfully implementing many and varied often extensive projects.

Large Commercial and Industrial Customer Energy Efficiency Programs serve commercial and industrial customers with a monthly max billing demand of ≥ 300 kW over the prior 12 months.

The Large Commercial Energy Efficiency Program (CEEP) provides on-site efficiency surveys and incentives for traditional prescriptive incentives ($/widget) as well as engineering-based custom recommendations ($/kWh saved and/or $ per kW reduced) tailored for site-specific opportunities and requirements.

The Large Industrial Energy Efficiency Energy Efficiency Program (IEEP) Phase V offerings will focus on the strategic energy management (SEM) approach. Under the SEM customers work with implementers to develop energy savings action plans, progress toward goals is tracked and with whole building measurement employed. IEEP will also provide prescriptive and custom measure incentives described above.

Governmental, Nonprofit Institutional (GNI) Sector:

Act 129 identifies[18] "Federal, State and local government, including municipalities, school districts, institutions of higher education and nonprofit entities" for receipt of carve-out protection and specialized programs in Phase I through III. In Phase IV the GNI carve-out was discontinued and Duquesne Light did not implement programs specifically serving the GNI sector. Phase IV C&I program activity saw significant drops in governmental and infrastructure projects. The sector needs engagement strategies to overcome GNI sector barriers to program participation. Barriers include the separation of operational and purchasing management where equipment first-cost-based decisions ignore life-cycle cost realities, long sales cycles, lack of expertise, and lack of centrally understood and managed energy use

The Public Agency Partnership (PAPP) was implemented directly by Duquesne Light in Act 129 Phases I, II and III, and is brought back for Phase V. Duquesne Light plans an expanded effort to engage this sector and will focus on governmental infrastructure, such as water and wastewater operations, centrally located district plants and the region's expansive primary, secondary and higher education institutions. As efficiency gain "low hanging fruit" evaporate due to previous program activities and evolving minimum federal efficiency standards, Duquesne Light will leverage its community relationships to pursue and rekindle deeper penetration into these important markets.

Commercial & Industrial Load Shifting: Large Commercial, Large Industrial and Public Agency Partnership Programs will offer C&I load shifting measures to strengthen and ensure Duquesne Light's ability to meet the Phase V demand reduction requirements.

3.1.3. Describe how components such as energy efficiency, combined heat and power, renewables, load shifting, and other measures are included in the portfolio of programs as applicable.

Duquesne Light will promote cost-effective measures under its portfolio of programs in order to achieve the Commission's mandates. These measures presently include CHP, solar power, solar, storage, and load shifting initiatives that include residential and C&L load shifting. These measures can be found listed in Section 11, Tables 8 and 9.

3.1.4. If the plan includes measures that promote fuel switching from electricity to fossil fuel, include a proposed minimum standard and provide justification for the threshold to receive program support. Combined heat and power projects are considered fuel switching (TRC Test Order at 84).

Duquesne Light's Phase V EE&C Plan does not have "fuel switching" measures, other than the scrutinized CHP measure, identified above. Evaluations of all CHP projects include a complete analysis of all-fuel impacts, fossil fuel savings and increases as well as metered electricity usage reductions. This includes emission control equipment and chemical additives as well as site-specific operations and maintenance costs. As such the resulting TRC cost test adequately serves and the "minimum standard for justification", Duquesne

[18] See footnote 8.

Light routinely calculates Participant Cost-Test, GHG emissions impacts, the Utility Cost Test, however, the TRC cost test standard is more than adequate, by definition.

3.1.5. Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants (2025 IO at 174). Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to funding electricity. Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.

The Phase V EE&C Plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR (see Section 11, Table 8: Eligible Measurers). Implementation CSP RFPs and contracted statements of work include a section on incentive braiding or "stacking" as follows:

> To the extend outside monetary resources are available to participating customers, such as the federal Inflation Reduction Act Home Electrification and Appliance Rebates (formerly HEEHRA / HEAR) or Whole-House Energy Efficiency Rebates (formerly HOMES / HER), CSP will assist customer and/or Duquesne Light to complete the necessary forms for submission to the PA Department of Environmental Protection and other agency programs.

Other than CHP (addressed above at Section 3.1.4.), Duquesne Light's Phase V EE&C Plan does not contain fuel switching measures. A data sharing partnership is being explored between the PA DEP, Resource Innovations, EDCs and others to streamline data flow and expedite braided incentive processing.

3.1.6. Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan. Include the expected contribution to portfolio MWh and MW savings and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation. Note that the contribution of FTM measures is limited to 10% of total plan savings (2025 IO at 78).

Duquesne Light makes provision for FTM measures within its listing of eligible measures. Whether conservation voltage reduction or other distribution system upgrades resulting in reduced system losses or delay system capacity upgrades, the size and type of these prospective measures is unknown at the time of this Plan filing, Duquesne Light will ensure that no more than 10% of its portfolio savings impacts derive from these types of measures.

3.1.7. Describe how the EDC defines "comprehensive" in the context of EE&C plan design and delivery and the comprehensive programs(s) to be offered to the residential and non-residential rate classes. Describe the measure mix or delivery mechanism that qualifies each program as comprehensive consistent with the requirements of the Phase V Implementation Order. Refer to the "Table 8 Addendum" in the Microsoft Excel version of the template tables for

a list of residential measures designated as "comprehensive" (2025 IO at 49-52 and 72).

Comprehensive measures are defined, prescribed and summarily ordered at Table 8 Addendum of the EE&C Plan Table template that is part of the Phase V Implementation Order. Duquesne Light makes no modification or exception to this Order and will employ the specified qualifications in its reporting of "comprehensive measure" impacts.

Refer to the Residential Programs described in Section 3.2, and Small Commercial Direct Install Program in Section 3.3.1, for the comprehensive measures to be offered.

3.1.8. If Time of Use rate(s) are part of the portfolio, describe how Act 129 support will lead to improved outcomes over simply offering the time-varying tariff through rates (2025 IO at 124).

At the time of this Plan filing, Duquesne Light began offering residential TOU rates as a pilot as of 6/1/2025. TOU rates will advance load shifting and bill reducing options.

3.2. Residential Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the following headings:

- Program Name and Program years during which program will be implemented[19]
- Objective(s)
- Target market – including market size to help frame participation estimates (e.g., number of households, electric sales etc.)
- Program description.
- If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.
- If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports.
- Describe how participation in other Act 129 programs (or other components of the same umbrella program) will be coordinated and encouraged.
- Implementation strategy (including expected changes that may occur in different program years).
- Program issues and risks and risk management strategy.
- Anticipated costs to participating customers.

[19] It is assumed that there are five program years, each starting June 1 and ending May 31st. The first program year (PY) is PY13 (June 1, 2021 to May 31, 2022) and the final program year is PY17 (June 1, 2025 to May 31, 2026).

- Ramp up strategy.
- Marketing strategy.
- Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., $ per measure, $ per kWh or MW saved). See Table 8.
- The basis for the proposed level of incentives and the sharing of incremental measure costs between participants and the EDC.
- Maximum deadlines for rebates including clear and reasonable rationale for the any timeframe longer than 180 days.
- Key schedule milestones.
- Assumed Evaluation, Measurement and Verification (EM&V) requirements required to document savings by the Commission's statewide evaluator (SWE).
- Administrative requirements – include internal and external staffing levels expressed on a full-time equivalent (FTE) basis.
- Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9.
- Estimated participation – include tables with key assumptions of estimated participation. See Table 9.
- Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs.[20] At least 50% of plan spending should be attributed to incentives (2025 IO at 232).
- Estimated percentage of sector budget attributed to program.
- Cost-effectiveness – include gross and net TRC and net-to-gross (NTGR) ratio[21] for each program. For gross tables, NTGR should be "1.0". See Table 14. Gross and Net versions (2025 IO at 217-221).
- Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.
- Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations.

[20] Per the June 18, 2020 Implementation Order, at least 50% of EE&C plan spending should come from incentives and less than 50% should be attributed to non-incentive cost categories. This requirement is at the portfolio level, not the program or sector level. *See June 18, 2020 Implementation Order* at 126.

[21] Per the June 18, 2020 Implementation Order, EDCs are required to provide NTG ratios in addition to standard TRC ratios, with language reiterating the speculative nature of NTG ratios. *See June 18, 2020 Implementation Order* at 107.

- Other information deemed appropriate.

3.2.1. Residential Energy Efficiency

Residential Energy Efficiency market-rate customer programs include appliance recycling, an online marketplace, a midstream incentives program and behavioral home energy reports program. The program delivery channels will deliver abroad range of appliances, plug load, space heating and cooling, lighting, water heating, refrigeration, shell and whole building measure end-use categories. Individual program components are described in more detail below.

3.2.1.1 Residential Appliance Recycling Program

Program Title and Program Years: The Residential Appliance Recycling Program (**"**RARP**"**) will be implemented during program years 2026 through 2031.

Objectives: The objective of the RARP is to reduce residential energy consumption by facilitating responsible removal and recycling of inefficient appliances. The program aims to promote environmental stewardship, ensure compliance with regulatory standards, and deliver measurable energy savings for the Duquesne Light service territory, while providing customers with a safe, convenient, and accessible recycling solution.

Target Market: The target market for the RARP consists of residential customers within the Duquesne Light service territory who own inefficient appliances such as refrigerators, freezers, room air conditioners, and dehumidifiers. The program is designed to reach a broad cross-section of households, including those in urban, suburban, and rural areas. Eligibility is based on appliance type and condition, and outreach efforts are tailored to engage diverse customer segments, including those who may face barriers to participation due to language, location, or awareness.

Program Description: The RARP is designed to provide residential customers with a safe, convenient, and environmentally responsible method for recycling inefficient appliances, including refrigerators, freezers, room air conditioners, and dehumidifiers. The program offers free pick-up and recycling services, ensuring all appliances are processed in accordance with environmentally responsible standards and industry best practices for refrigerant recovery and material handling.

The program features streamlined enrollment and scheduling, verified customer and appliance eligibility, and rigorous safety and quality assurance protocols. Appliances are collected by appliance collection crews and transported to stakeholders or Duquesne Light-approved recycling facilities, with chain-of-custody procedures and documentation maintained throughout the process.

Implementation Strategy: The implementation strategy for the RARP in Phase V consists of the following:

- Participant recruitment leveraging utility customer outreach, targeted marketing (e.g., bill inserts, emails, digital ads), and contractor/vendor partnerships to drive program participation.
- Coordination of customer appointments, ensuring reliable pick-up through trained contractors.
- Safe appliance removal and transport are handled by trained providers who meet safety and compliance standards to ensure proper refrigerant recovery and environmental compliance.
- Recycling and disposal through centralized providers who follow environmental standards, including responsible refrigerant handling, and meet the documentation requirements of the program.
- Bilingual (for example Spanish and English) customer care services.

Program Issues, Risks and Risk Management Strategy: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program incentives, potential impacts and provides early warning regarding program under- or over-subscription.

The RARP faces several key risks, including on-site safety hazards, transport incidents, missed pickups, compliance with regulatory standards, equipment eligibility and fraud, and improper disposal or illegal resale.

To mitigate these risks, the implementer requires EPA 608 certification for facility personnel handling refrigerants, maintains a risk tracker and escalation system, and establishes tiered contractor networks with backup recycler relationships. The program implements chain-of-custody protocols with photo verification and fraud detection, enforces safety and PPE standards, and conducts annual facility compliance checks. Insurance and bonding are maintained for all vendors, and weekly risk reviews are held with program partners. Subcontractors are contractually held to performance standards, with clawbacks and holdbacks applied for noncompliance. Additional measures include mandatory vendor certification, ride-along audits, digital job checklists, daily and weekly quality assurance sampling, KPI dashboards, quarterly re-certification, and a dedicated support line for claims or missed pickups.

This risk management approach ensures regulatory compliance, operational reliability, and a positive customer experience, while maintaining transparency and accountability throughout program implementation.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers: There is no cost to participating in customers for this program. Incentive amounts are benchmarked to like regional programs and adjusted, as needed, to ensure active program participation. This is the fifth Act 129 phase for implementation of this program.

Ramp-up Strategy: During the ramp-up phase, the implementation contractor will develop the program communications plan, review historical data for eligibility enforcement and targeted outreach, and create updated program collateral. The implementation contractor will

recruit and onboard local pickup companies and recycling facilities. See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: The RARP marketing strategy is designed to maximize customer awareness and participation through a multi-channel approach, utilizing digital advertising, paid search, social media, email campaigns, direct mail, and community-based outreach. The program will utilize propensity modeling to identify customers with a high likelihood of participating. Marketing materials will be produced in English and Spanish for language accessibility.

Outreach efforts include in-person events, partnerships with community-based organizations, and cross-promotion with other Duquesne Light programs. Customer education is supported through targeted campaigns, while the call center offers multilingual support to address inquiries and facilitate enrollment.

This integrated marketing strategy ensures broad reach, equitable access, and effective communication with eligible customers.

Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions, and Incentive Levels: Eligible measures include refrigerators, freezers, dehumidifiers, and room air conditioners as shown in Section 11, Table 8: Eligible Measures.

Maximum Deadline for Rebates: Rebate deadlines do not apply to appliance recycling programs.

Program Start Date and Key Milestones: Program is set to start on June 1, 2026 and run throughout the duration of Phase V ending on May 31, 2031.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 residential programs. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services.

Estimated Participation: See the following table.

ARP Savings Targets and Estimated Participation:[22]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	1,003.2	1,103.4	1,214.5	1,335.5	1,469.4	6,126.0
MW	0.188	0.206	0.227	0.250	0.275	1.145
Participation	1,312.5	1,443.5	1,588.8	1,747.2	1,922.3	8,014

ARP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	471,432.0	518,489.6	570,680.8	627,577.8	690,463.9	$2,878,644
Incentives	166,925.7	183,588.0	202,068.0	222,214.2	244,481.1	$1,019,277
Percent Incentives	35.4%	35.4%	35.4%	35.4%	35.4%	35.4%
Percent Non-Incentives	64.6%	64.6%	64.6%	64.6%	64.6%	64.6%

ARP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Appliance Recycling	$469,277	$516,120	$568,072	$624,709	$687,308	$2,878,644
Percent Sector Budget	6.7%	7.1%	7.6%	8.8%	9.9%	8.1%

ARP Cost Effectiveness:

- Gross TRC: 2.92
- NTG Ratio: 71.7%
- Net TRC: 2.10

3.2.1.2 Residential Online Marketplace Program

Program Title and Program Years: The Residential Online Marketplace Program ("OMP") will be implemented during program years 2026 through 2031.

Objectives: The Residential Online Marketplace will serve residential electric customers within Duquesne Light's operating territory. The marketplace will allow eligible customers the chance to shop for energy-saving products and apply instant utility incentives at checkout. The marketplace seamlessly validates customers, ensuring eligibility for utility provided rebates. Customers can shop for products including smart thermostats, dehumidifiers, advanced power strips, room air purifiers, weatherization products and more.

Throughout the year, additional promotional discounts will be provided by product manufacturers to further discount products to Duquesne Light's customers.

Target Market: All Duquesne Light residential customers will be eligible to create an account and shop the online marketplace. Participation limits will be upheld, systematically, to ensure

[22] Participation for this program are measured in units recycled.

customers receive the maximum allotted utility rebate(s). Targeted marketing campaigns will be sent to customers through various digital and print advertising based on the customer's propensity to participate in the program. Utilizing past participation data will help narrow the target audience to customers who are more likely to participate, thereby decreasing customer acquisition costs and improving overall program cost-effectiveness.

In addition to the standard offering, the program will target low-to-moderate income customers, defined for the purpose of this program as 151-225% Federal Poverty Guidelines ("FPG"), that will receive greater program benefits beyond the standard incentives after completing a qualification step in their energy efficiency journey. These enhanced incentives will offset one-third of the cost of the efficient product, with a per product incentive cap of $500.

Program Description: The Residential Online Marketplace will serve as a web-based, e-Commerce store, similar to that of Amazon.com or Walmart.com. New customers will create an online marketplace account by entering their utility account information in combination with their personal contact information. Existing users will be allowed to log into their account by entering the email and password that is set up during initial account creation.

Eligibility for utility incentives will be based on account numbers and past participation/purchases will determine future incentives for the customer. Limiting customers to a set rebate quantity helps to ensure more customers can utilize the program funding.

Implementation Strategy: It will be imperative to maximize the number of customers who are engaging with the marketplace in its initial year. Re-engaging with customers, utilizing propensity modeling, and improving the marketing of the marketplace are vital steps to ensuring savings goals are met through increased participation.

Utilizing cross promotional marketing and identifying customers who are most likely to utilize the marketplace will be the initial priorities when the marketplace launches. The application of A/B testing, development of digital and print marketing creative, and capitalization of manufacturer promotions will be key in driving early success in the marketplace.

During Phase V, the program will identify new products to add to the marketplace and re-target past participants to improve savings opportunities.

Program Issues, Risks and Risk Management Strategy: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warnings regarding program under- or over-subscription. CSP implementation contract statements of work include pay-for-performance compensation. Provisions in CSP contract language provide for shifting funds from under-performing programs.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers:

Customers will pay for marketplace products that have been discounted due to the instant application of incentives to the purchase price.

The marketplace's instant discounts to customers provide superior pricing to that of other online retailers. Also, customers can receive even further discounts during the many periodic limited time offer promotions in the marketplace.

Marketplaces provide lower costs to customers, and the marketplace in itself is a far more cost-effective approach than traditional mail-in programs. Mail-in programs require labor to set up point of purchase displays in store, intake and process rebate application forms, and manage payment processing. The marketplace provides a "one-stop shop" where products and their applicable utility incentives are displayed to the customer through an e-Commerce experience. This includes the enhanced incentives offered to low-to-moderate income customers (see Target Market above). Additional energy efficient product incentive payments are available as shown in Section 11 Table 8 Eligible Measures. Participating customers pay the remaining amounts.

Ramp-up Strategy: For Phase V, the program will enhance and expand the existing marketplace from Phase IV. The implementer will deploy a new "look and feel" to the store to give it a modern look to existing and new customers.

During ramp-up, the implementer will develop a wide variety of marketing tactics to drive improved traffic to the marketplace. They will perform data-driven propensity modeling to identify target customers who have a high likelihood of utilizing the marketplace. See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: Marketing for the online marketplace will rely primarily on digital advertising (e.g., social media and email) as they are cost-effective and reach broad audiences quickly. Also, the program will deploy targeted marketing based on the propensity model analysis to reach targeted customer segments with high likelihood to shop on the marketplace. Additional marketing tactics include Google Performance Max advertisements, direct mail, and targeted email campaigns to drive engagement with differentiated messaging.

Throughout the year, the marketplace will collaborate with manufacturers to offer limited-time deals on products such as thermostats, air purifiers, and water solutions. These special offers give customers extra incentive to buy by stacking additional instant discounts on top of the standard utility rebate, resulting in even greater savings. Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions and Incentive Levels: See Section 11, Table 8.

Maximum Deadline for Rebates: Energy efficiency measure rebates are subject to an application deadline of 180 days from date of purchase or installation.

Program Start Date and Key Milestones: Refer to Section 12 Chart 1, Residential Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commission’s Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Levels of rigor in verification are based on project scope, as

identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 residential programs. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services. Program administrative costs are shown in the following Projected Program Budget table.

OMP Savings Targets and Estimated Participation:[23]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	1,261.8	1,280.9	1,300.0	1,319.1	1,338.2	6,500.0
MW	0.585	0.594	0.603	0.612	0.621	3.015
Participation	5,168.9	5,247.1	5,325.4	5,403.6	5,481.9	26,627

OMP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	$721,984	$732,914	$743,844	$754,773	$765,703	$3,719,218
Incentives	$292,422	$296,849	$301,276	$305,703	$310,129	$1,506,378
Percent Incentives	40.5%	40.5%	40.5%	40.5%	40.5%	40.5%
Percent Non-Incentives	59.5%	59.5%	59.5%	59.5%	59.5%	59.5%

OMP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Marketplace	$721,984	$732,914	$743,844	$754,774	$765,703	$3,719,218
Percent Sector Budget	10.4%	10.1%	10.0%	10.6%	11.1%	10.4%

OMP Cost Effectiveness:

- Gross TRC: 2.21
- NTG Ratio: 100%
- Net TRC: 2.21

3.2.1.3 Residential Midstream Incentives Program

Program Title and Program Years: The Residential Midstream Incentives Program ("RMIP") will be implemented during program years 2026 through 2031.

[23] Participation in this program is measure units delivered.

Objectives: The Residential Midstream Incentives Program will increase purchases of select efficient HVAC, hot water, and auxiliary equipment by Duquesne Light's residential customers through incentive offers to participating distributors. For many residential customers, product availability, complex rebate application requirements, and lengthy rebate processing lead times, present significant barriers to energy efficiency program participation. Providing incentives directly to participating distributors at the point of sale addresses these significant barriers and delivers an energy efficiency message while the customer is considering their product choices.

Target Market: This program is made available to Duquesne Light residential customers. Based on Total Residential Building Stock estimate of 527,951 (includes single-family ("SF"), multifamily ("MF"), and Mobile Homes).

Program Description: The Residential Midstream Incentives Program will provide incentives for HVAC, hot water, and auxiliary equipment through participating distributors to offset the higher cost and increase availability of efficient products in the market. Increased availability and lower costs thereby drive uptake of the most efficient equipment options. The residential customer receives the benefit of the incentive through increased product availability, increased market awareness, or through a pass through of a portion of the incentive from the participating distributor. Participating distributors may be working directly with the customer or through installation contractors. The rebates will encourage residential customers in Duquesne Light's territory to purchase qualified energy efficient HVAC, hot water, and auxiliary equipment for installation at their homes through a streamlined rebate process.

Implementation Strategy: The CSP will execute the following tasks:

1) Identify and enroll HVAC distributors active in the residential market.
2) Create and maintain a qualified product master list.
3) Verify eligible customers.
4) Accept regular submissions from midstream partners via an online portal.
5) Present Duquesne Light with new eligible measures.
6) Provide participating distributors in-depth training and on-going support.
7) Verify and process rebate submissions.
8) Track and report program activity.
9) Perform store visits.
10) Implement a quality control process.

The initiative provides both passthrough incentives and flexible distributor incentives that are used to mitigate risk and capitalize on opportunities. Flexible incentives can be passed

through to end use customers, offset stocking charges, motivate sales representatives or address other perceived risks to supply chain actors. The utilization of flexible incentives tends to change over time as participating distributors identify and mitigate the risks and opportunities for their business. Both passthrough and flexible incentives are considered "Customer Incentives" analogous to incentives that offset installation costs in other portfolio contexts as the energy savings opportunity may not occur without this market support.

Residential customers can qualify as low-income through Duquesne Light's existing low- and moderate-income verification process. Customers will be allowed to provide an affidavit for self-attestation of required data. Low- and moderate-income customers may qualify for additional program benefits.

The program may adjust incentive offer based on actual or projected participation levels while maintaining program cost effectiveness and or increased customer value.

Program Issues, Risks and Risk Management Strategy: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program incentives, potential impacts and provides early warning regarding program under- or over-subscription.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers: Incentive levels have historically averaged approximately one-third of efficient product incremental costs and current incentive levels range from an estimated 7% for mini-split measures and 20 to 40% for core HVAC/ Water heating measures. Incentive values increase for low- and moderate-income households. The increased offer for low- and moderate-income households will be monitored to ensure that the overall initiative stays within budgetary limits.

Participating distributors' rebates offset a portion of the incrementally greater cost of high-efficiency HVAC, hot water, and auxiliary equipment. Anticipated customer costs reflect the remaining balance after the incentive is applied.

Ramp up Strategy: See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: Duquesne Light's CSP will recruit, train, and manage distributor partnerships, and continue to engage in distributor networks through targeted marketing approaches. CSP will coordinate annual kick-off meetings to introduce the program to residential HVAC distributors, facilitate education group meetings, provide distributor portal for ease of participation in the program and supply a newsletter on program updates, rebates, and recognition for high-performing participating distributors.

Eligible Measures and Incentive Strategy: A rebate will be granted by participating distributors at the point of sale on a pre-determined qualified products list, as indicated below. CSP will engage Duquesne Light with new high-efficiency products to keep the qualified product list current, fresh, and appealing to the consumers. See Table 8 Eligible Measures for a listing of measures and range for incentives.

Maximum Deadline for Rebates: The Midstream Products Rebate Program offers rebates at the point of sale at participating distributors. Rebate deadlines are not applicable.

Program Start Date and Key Milestones: Program is set to start on June 1, 2026, and run throughout the duration of Phase V ending on May 31, 2031.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Levels of verification will be based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administration Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 residential programs. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services. Program administrative costs are shown in the following Projected Program Budget table.

Estimated Participation: The primary metrics for program participation are processing incentive payments for the purchase of qualified energy efficiency measures, rendering deemed savings estimates reflected in the Program Savings Targets table below.

RMIP Savings Targets and Estimated Participation:[24]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	3,744.065	3,957.344	4,028.186	4,099.028	4,171.377	20,000.0
MW	0.203	0.215	0.219	0.223	0.227	1.086
Participation	3,640	3,848	3,917	3,986	4,056	19,447

RMIP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	1,509,527	1,595,517	1,624,079	1,652,641	1,681,810	$8,063,573
Incentives	876,779	926,725	943,314	959,904	976,847	$4,683,569
Percent Incentives	58.1%	58.1%	58.1%	58.1%	58.1%	58.1%
Percent Non-Incentives	41.9%	41.9%	41.9%	41.9%	41.9%	41.9%

RMIP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Midstream Incentives	$1,509,527	$1,595,517	$1,624,079	$1,652,641	$1,681,810	$8,063,574
Percent Sector Budget	21.7%	21.9%	21.9%	23.3%	24.3%	22.6%

[24] Participation in this program is measure units incented.

RMIP Cost Effectiveness:

- Gross TRC: 0.50
- NTG Ratio: 100%
- Net TRC: 0.50

3.2.1.4. Residential Behavioral Energy Efficiency

Program Title and Program Years: The Residential Behavioral Energy Efficiency Program ("R-BEEP") will be implemented during program years 2026 through 2031.

Objectives: The objectives of the program are (1) to educate residential participants on electricity consumption using graphic information tools; (2) to change household behavior leading to less electricity usage; and (3) to deliver energy savings of more than 1% of average participant's electric usage.

Target Market: Over the five-year Phase V performance period the average annual treatment group population is projected to be up to 178,000 residential customers.

Program Description: The program sends via direct mail R-BEEP reports that compare recipient customer's energy use to customers with similar home type and size. R-BEEP provides for comparison of the last two months of energy consumption by 1) the most efficient of the peer group, 2) the R-BEEP recipient, and 3) the entire peer group. The reports generate verifiable savings between 1.5%-3.5% of total home energy use.

Implementation Strategy: R-BEEP reports are provided targeted customer group in each year of Act 129 Phase V, 2026-2031.

Program Issues, Risks and Risk Management Strategy: There is an attendant risk the program implementer cannot deliver the contracted R-BEEP reports and that consumers will not respond to the R-BEEP reports by changing energy use behavior. Duquesne Light will mitigate this risk by selecting an implementation contractor who has a proven track record. The selected CSP will have previously deployed R-BEEP reports on a national scale for leading energy efficiency programs. Energy savings results will be quantified using a PA PUC approved scientific measurement and verification approach previously used by most PA EDCs.

Anticipated Costs to Participating Customers: There is no cost to participating customers.

Ramp-up Strategy: See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: Large-scale, individualized direct-mail campaign and provision of a customer service web portal are used. High-use customers are selected on an opt-out basis for enrollment in the multi-year pilot.

Eligible Measures and Incentives: The R-BEEP described above is the only program measure; there are no customer incentives. R-BEEP reports will also be utilized to promote other residential program offerings to help customers reduce consumption.

Maximum Deadline for Rebates: The program does not provide rebates and no rebate deadline is applicable.

Program Start Date and Key Milestones: Program is set to start on June 1, 2026, and run throughout the duration of Phase V ending on May 31, 2031.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Duquesne Light will rely on the same measurement and verification approach already provided to more than 65 utilities across the country, including utilities in Pennsylvania. The protocol includes clearly defined test and control groups and ex-post measurement of savings.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes one dedicated full-time employee to perform management and coordination of this program. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services. Program administrative costs are shown in the following Projected Program Budget table.

Estimated Participation: Over the five-year Phase V performance period the average annual treatment group population is projected to be up to 178,000 residential customers, rendering deemed savings estimates reflected in the Program Savings Targets table below.

R-BEEP Savings Targets and Estimated Participation:[25]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	5,800.0	6,800.0	6,900.0	5,800.0	4,900.0	30,200.0
MW	1.4	1.6	1.6	1.4	1.1	7.050
Participation	129,000	174,900	178,800	142,300	125,300	150,060

R-BEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	$961,370	$1,127,123	$1,143,698	$961,370	$812,192	$5,005,752
Incentives	$0	$0	$0	$0	$0	$0
Percent Incentives	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Non-Incentives	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

[25] Estimated participation is customers within treatment cohorts.

R-BEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	**PY19**	**PY20**	**PY21**	**PY22**	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Residential Behavioral Efficiency	$961,370	$1,127,123	$1,143,698	$961,370	$812,192	$5,005,752
Percent Sector Budget	13.8%	15.5%	15.4%	13.5%	11.8%	14.0%

R-BEEP Cost Effectiveness:

- Gross TRC: 1.41
- NTG Ratio: 100%
- Net TRC: 1.41

3.2.2. The Residential Low-Income Energy Efficiency

Residential Low-Income Energy Efficiency is an umbrella program comprising two specific low-income residential customer program activities. Individual program components include a low-income comprehensive audit and direct install program and a tailored low-income behavioral efficiency program. The program delivery channels will deliver abroad range direct-install measures and behavioral education to assist low-income customers reduce their electric bills. Individual program components are described in more detail in Sections 3.2.2.1 and 3.2.2.2 below.

3.2.2.1. Low-Income Energy Efficiency Program

The Residential Low-Income Energy Efficiency Program is a "direct-install" program where walk-through and comprehensive audits are performed, energy efficiency education is provided, and energy efficient products and equipment are installed at no cost to income qualified households.

Program Title and Program Years: Low-Income Residential Energy Efficiency Program ("LIEEP") will be implemented during Act 129 program years 2026 through 2031.

Objectives: The objective of the Residential Low-Income Energy Efficiency Program is to improve energy efficiency and reduce energy costs for income-qualified households within the Duquesne Light service territory. The program aims to deliver comprehensive energy-saving measures, including in-home energy assessments, direct installation of efficiency upgrades, and customer education, with a focus on enhancing comfort, health, and affordability for low-income residents.

Target Market: The target audience of LIEEP is income-qualified households within the Duquesne Light service territory. This includes single family and multifamily residences where occupants meet established income eligibility criteria, at or below 150% of the Federal Poverty Guidelines. The program is designed to reach customers who may face barriers to participation due to financial constraints, language, or lack of awareness, with a focus on

underserved and disadvantaged communities. Outreach efforts are tailored to engage these households through community-based organizations, multilingual communications, and accessible enrollment channels.

Program Description: The single-family component of LIEEP provides eligible households with comprehensive energy assessments and direct installation of energy-saving measures. Services include walk-through audits, energy education, and the installation of high-efficiency lighting, water-saving devices, insulation, air sealing, and smart thermostats where applicable. The program is designed to reduce energy costs, improve comfort and health, and address barriers to participation for income-qualified customers. Outreach and enrollment are facilitated through community-based organizations and targeted communications to ensure accessibility and engagement.

The multifamily component of LIEEP targets properties with both individually metered or master-metered units that represents a significant proportion of low-income residents. The program delivers in-unit energy assessments, direct installation of efficiency upgrades such as lighting, water-saving devices, and smart thermostats, as well as common area improvements including LED retrofits and controls. Coordination with property managers and owners ensures streamlined scheduling and implementation. The program aims to maximize energy and water savings, reduce maintenance costs, and enhance tenant comfort, while leveraging partnerships with community organizations to reach and serve disadvantaged populations.

Implementation Strategy: (including expected changes that may occur in different program years).

The implementation strategy for LIEEP is structured to ensure effective delivery of energy-saving measures to income-qualified households through both single family and multifamily program tracks.

For single family homes, the program begins with targeted outreach and enrollment facilitated by community-based organizations and direct communications. Eligible households receive comprehensive in-home energy assessments, followed by the direct installation of efficiency upgrades such as high-efficiency lighting, water-saving devices, insulation, air sealing, and smart thermostats. The process includes energy education and support to maximize participation and savings. Quality assurance is maintained through digital documentation, ride-along audits, and regular performance reviews.

For multifamily properties, the program coordinates with property managers and owners to identify eligible buildings and residents. Individually metered or master-metered units with a significant proportion of low-income tenants are prioritized. In-unit assessments and installations are conducted, along with common area improvements such as lighting, controls, HVAC equipment, pool pumps, beverage machine controls, washers, dryers, cooking equipment, water pumping equipment, etc. Scheduling and implementation are streamlined to minimize disruption, and partnerships with community organizations help ensure broad engagement. The program leverages data tracking, compliance checks, and ongoing communication with stakeholders to monitor progress and maintain high standards of service delivery.

Duquesne Light will track low-income customer participation through its Program Management and Reporting Systems ("PMRS"). Through linkage to Duquesne Light's customer information system, PMRS records low-income status and records savings achieved in low-income households.

Duquesne Light will refer confirmed low-income customers who participate in any general residential program to its Act 129 low-income programs, Universal Service programs, LIHEAP, and LIURP. The Company will also coordinate with natural gas distribution companies (NGDC) and community-based organizations, as applicable, to provide comprehensive low-income services.

Duquesne Light will facilitate this coordination by inviting representatives from the NGDCs with overlapping service territories to its Act 129 Stakeholder meetings and will place the issue of Duquesne Light/NGDC coordination on the agenda of those meetings. Duquesne Light has actively participated in several stakeholder meetings with NGDCs throughout Phases III and IV in conjunction with the Income Eligible Advisory Group to gain valuable stakeholder input. Duquesne Light will also work with NGDCs to, where possible, provide joint rebates when the NGDC provides rebates to customers below 150% of the federal poverty level and to provide inter-utility audits to customers whose total household income is below 150% of the federal poverty level when available.

Duquesne Light will track the numbers of, and reasons for, LIEEP jobs that do not move forward and the total number of LIEEP baseload and heating jobs all separately tracked for low-income single-family, master metered multifamily and individually metered multifamily tenants. In addition, the average LIEEP job costs and energy savings will be tracked. These data will be provided at the IEAG working group meetings.

Program Issues, Risks and Risk Management Strategy: The program faces several key risks, including:

- Customer Participation Barriers: Challenges such as lack of trust, privacy concerns, limited time, competing priorities, and low awareness may hinder enrollment, especially among disadvantaged populations.
- Landlord Approval and Split Incentive Barriers: For multifamily properties, property owner/manager consent will be required. Property owners and managers have low incentive to invest in in-unit energy savings that benefit residents.
- Health and Safety Risks: Deferred maintenance or health and safety issues in homes may prevent or delay installation of energy efficiency measures.

To address these risks, the program employs the following mitigation strategies:

- Community-Based Outreach: Partnering with trusted community organizations and using multilingual campaigns to build trust and increase awareness among target audiences.
- Flexible Scheduling and Enrollment: Offering evening and weekend appointments, proactive outbound calling, and in-home enrollment to accommodate customer needs.

- Owner and Property Manager Engagement: Providing consent toolkits, no-cost direct install of measures where feasible, and clear communication of program and downstream benefits to property owners and managers to facilitate participation in multifamily properties.
- Health and Safety Routing: Triaging health and safety issues and braiding funding with other programs to address deferred maintenance before energy upgrades.

All portfolios and programs are tracked and monitored through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets, potential impacts and provides early warning regarding program under- or over-subscription. The CSP will continue to transfer program data for review, verification, and submission into Duquesne Light's PMRS. All of these program elements have been operating during the previous Act 129 Phases. These activities are not new to Duquesne Light's implementation team. Implementation CSP contract statements of work are performance-based, include production schedules, and performance payments are tied to independent measurement. Provisions in CSP contract language provide for shifting funds from under-performing programs.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers: For single family homes, LIEEP remains no-cost for households at or below 150% FPG. For multifamily properties, in-unit work is no-cost provided that 45% or more of the units are low-income, and units are individually metered.

Ramp-up Strategy: The ramp-up LIEEP focuses on readiness, stakeholder alignment, and early engagement of eligible households. Initial activities include finalizing contracts and Memorandums of Understanding (MOUs) with trade allies and community-based organizations, configuring program management systems, and preparing marketing and outreach materials.

Enrollment channels will be established to facilitate customer access, including web, phone, and in-person options, with multilingual support available. Early outreach will leverage community events, targeted communications, and partnerships to build awareness and drive participation. The program launches with a controlled soft open, allowing for validation of data flows, eligibility checks, and Quality Assurance (QA) sampling. See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: The LIEEP marketing strategy is designed to maximize customer awareness and participation through a multi-channel approach, utilizing digital advertising, paid search, social media, email campaigns, direct mail, and community-based outreach. The program will utilize propensity modeling to identify customers with a high likelihood of participating. Marketing materials will be produced in English and Spanish for language accessibility.

Outreach efforts include in-person events, partnerships with community-based organizations, and cross-promotion with other Duquesne Light programs. Customer education is supported through targeted campaigns, while the call center offers multilingual support to address inquiries and facilitate enrollment. This integrated marketing strategy ensures broad reach, equitable access, and effective communication with eligible customers.

Additionally, Duquesne will work with the Income Eligible Advisory Group to coordinate a wholistic community initiative for targeted customers designed to provide coordinated "wrap-around" supportive services (including, for example, assistance related to energy costs, housing, mental health, food insecurity, etc.).

Eligible Measures and Incentive Strategy: LIEEP will provide a broad array of direct-install measures, depending upon applicable dwelling space heating and water heating equipment. Eligible measures are described below. No customer incentives are provided under the LIEEP, all LIEEP measures are provided at no cost to income qualified customers. For more specific details on the measures, see Section 11, Table 8.

Under LIEEP, income qualified residential customers will be scheduled for a virtual assessment or in-home energy audit that will include direct install measures as indicated in the below, as well as energy education. For the virtual assessment, the direct install measures will be drop shipped to the customer in the form of an energy efficiency kit and customers may be referred for direct installation of eligible HVAC, water heat, health & safety, and insulation/air sealing measures.

Eligible Direct Install Measures:

LED Nightlights
LED Lighting
Advanced Power strips (Tier 1)
ENERGY STAR Dehumidifier
Refrigerator Replacement
Room AC Replacement
Window Heat Pump
Freezer Replacement
Connected Thermostat- Electric Heat
Heat Pump Water Heater
Ductless Mini-Split Heat Pump (16 SEER / 9.0 hspf) – Electric Heat
ENERGY STAR Central Air Conditioner (13 SEER to 16 SEER)
ENERGY STAR Air Source Heat Pump 16 SEER/9.0 HSPF or Higher

Air Sealing – Electric Heat
Ceiling Insulation - Electric Heat
Basement Wall Insulation – Electric Heat
Exterior Wall Insulation - Electric Heat
Floor Insulation - Electric Heat
Electric Hot Water Kit
H&S measures, Comprehensive

Basis for the Proposed Level of Incentives and the Sharing of Incremental Measure Costs between Participants and the EDC:

LIEEP measures are provided at no cost to income qualified customers. Multifamily facility upgrade cost-shares are negotiated on a case-by-case basis depending upon the percentage of low-income occupants in the facility, facility need and savings opportunity.

Maximum Deadline for Rebates: No standard, or other, prescriptive rebates are provided under this program and no "Maximum Deadline for Rebates" is applicable.

Program Start Date and Key Milestones: Refer to Section 12 Chart 1, Residential Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 residential programs. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services.

LIEEP Savings Targets and Estimated Participation:[26]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	3,318.2	3,353.2	3,386.2	3,418.2	3,456.2	16,932.0
MW	1.228	1.241	1.253	1.265	1.279	6.265
Participation	42,968	43,421	43,849	44,263	44,755	219,256

[26] Participation is units of measures installed.

LIEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	$2,977,974	$3,009,388	$3,039,006	$3,067,727	$3,101,832	$15,195,927
Incentives	$1,778,106	$1,796,862	$1,814,547	$1,831,696	$1,852,060	$9,073,271
Percent Incentives	59.7%	59.7%	59.7%	59.7%	59.7%	59.7%
Percent Non-Incentives	40.3%	40.3%	40.3%	40.3%	40.3%	40.3%

LIEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Low-Income Efficiency	$2,977,975	$3,009,388	$3,039,006	$3,067,727	$3,101,833	$15,195,930
Percent Sector Budget	42.8%	41.3%	40.9%	43.2%	44.9%	42.6%

LIEEP Cost Effectiveness:

- Gross TRC: 2.01
- NTG Ratio: 100%
- Net TRC: 2.01

3.2.2.2. Low-Income Behavioral Efficiency Program

Program Title and Program Years: Low-Income Behavioral Energy Efficiency Program ("LI-BEEP") will be implemented during program years 2026 through 2031.

Objectives: The objectives of the program are (1) provide income qualified participants education about electricity consumption, cost and potential energy efficiency bill savings using graphic information tools; (2) change household behavior leading to less electricity usage; and (3) deliver energy savings of more than 1% of average participant's electric usage.

Target Market: Over the five-year Phase V performance period the average annual participation is projected to be up to 13,760 income qualified residential customers.

Program Description: Specialized low-income home energy reports are provided to a targeted an average income qualified customer population of approximately 13,760 customers each year of the Phase V performance period. Savings impact measurement is based on documented savings comparing the program participant population energy use behavior to a low-income non-participating control group. The remaining programmatic approaches and methodologies are consistent with Plan content described in the R-BEEP at Section 3.2.1.4.

Implementation Strategy: LI-BEEP reports are provided targeted customer group in each year of Act 129 Phase V, 2026-2031.

Program Issues, Risks and Risk Management Strategy: There is an attendant risk the program implementer cannot deliver the contracted LI-BEEP reports and that consumers will not respond to the LI-BEEP reports by changing energy use behavior. Duquesne Light will

mitigate this risk by selecting an implementation contractor who has a proven track record. Energy savings results will be quantified using a PA PUC approved scientific measurement and verification approach previously used by most PA EDCs.

Anticipated Costs to Participating Customers: There is no cost to participating customers.

Ramp-up Strategy: See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: Large-scale, individualized direct-mail campaign and provision of a customer service web portal are used. High-use customers are selected on an opt-out basis for enrollment in the multi-year pilot.

Eligible Measures and Incentive Strategy: The LI-BEEP described above is the only program measure; there are no customer incentives. LI-BEEP reports will also be utilized to promote other residential program offerings to help customers reduce consumption.

Maximum Deadline for Rebates: The program does not provide rebates and no rebate deadline is applicable.

Program Start Date and Key Milestones: Program is set to start on June 1, 2026, and run throughout the duration of Phase V ending on May 31, 2031.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Duquesne Light will rely on the same measurement and verification approach already provided to more than 65 utilities across the country, including utilities in Pennsylvania. The protocol includes clearly defined test and control groups and ex-post measurement of savings. M&V and EM&V will employ the Randomized Control Trial measurement protocol.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 residential programs. The Residential Customer program associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services. Program administrative costs are shown in the following Projected Program Budget table.

Estimated Participation: Over the five-year Phase V performance period the average annual participation is projected to be between 9,200 and 17,200 treatment population, the five-year average annual participant projection is 13,760 income qualified residential customers, rendering deemed savings estimates reflected in the Program Savings Targets table below.

LI-BEEP Savings Targets and Estimated Participation:[27]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	1,300.0	700.0	700.0	700.0	800.0	4,200.0
MW	0.275	0.148	0.148	0.148	0.170	0.890
Participation	15,100	17,200	10,800	9,200	16,500	13,760

LI-BEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	252,134.4	135,764.7	135,764.7	135,764.7	155,159.6	$814,588
Incentives	$0	$0	$0	$0	$0	$0
Percent Incentives	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Non-Incentives	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

LI-BEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Residential Sector Budget	$6,954,095	$7,286,910	$7,431,287	$7,107,520	$6,910,428	$35,690,239
Low-Income Behavioral Efficiency	$252,134	$135,765	$135,765	$135,765	$155,160	$814,588
Percent Sector Budget	3.6%	1.9%	1.8%	1.9%	2.2%	2.3%

LI-BEEP Cost Effectiveness:

- Gross TRC: 1.15
- NTG Ratio: 100%
- Net TRC: 1.15

3.3. Small Commercial & Industrial Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).

The Small-Medium Nonresidential Customer Energy Efficiency Program (C&I customers with a monthly max billing demand of less than 300 kW over the prior 12 months) provides direct-install, downstream and midstream incentive engagement channels successful in Phase IV and are continued in Phase V. Traditional EE measure include lighting, refrigeration, space heating, cooling and ventilation: water heating, commercial cooking equipment, compressed air system improvements. Additional measures tested in Phase IV will be expanded in Phase V including virtual commissioning and strategic energy management, and whole building impact measures.

3.3.1. Small-Medium Nonresidential Energy Efficiency Program

Program Title and Program Years: Small-Medium Nonresidential Energy Efficiency Program (SNEEP) will be implemented during program years 2026 through 2031.

[27] Estimated participation is customers within treatment cohorts.

Objectives: Downstream: SNEEP Downstream prescriptive incentives serve to offset the incrementally higher cost of energy efficiency equipment, making the buyer indifferent selecting the higher cost. Equipment overcoming the "first-cost" barrier. SNEEP Downstream incentives emphasize networked lighting controls with commissioning, advanced rooftop unitary controls and demand-controlled ventilation, and a tune-and-save verified with smart-thermostats and building management system data. Downstream SNEEP also provides virtual commissioning which has proven successful in Phase IV.

Midstream: SNEEP Midstream is designed to influence the equipment purchasing decisions targeting a broad range of commercial and industrial products: Lighting, lighting controls, packaged and unitary air conditioning and heat pumps, chilled water systems high-efficiency pumping system, air compression systems and controls. diverse the midstream measure offering. The initiative moves incentives up the supply chain to the distributors and manufacturers that have the greatest influence on equipment stocking and sales. It provides incentives to offset the incrementally higher cost of the high-efficiency equipment to overcome customer "first-cost" objections to purchase and install the higher efficiency equipment. A similar offering was fully subscribed in Phase IV and has been, as a result, expanded in Phase V in response to sector demonstrated interest and need.

Direct-Install: SNEEP Direct-Install initiative provides customers with a single source of information, energy assessments, technical assistance, and financial incentives. The program incorporates an end-to-end approach including marketing, the site survey and final equipment installation. The program is designed to deliver immediate and measurable savings through the distribution of starter kits and direct retrofit of existing equipment.

Target Market: The SNEEP targets Duquesne Light's commercial and industrial sector customers with a monthly max billing demand of less than 300 kW over the prior 12 months. Its Midstream offering serves customers that would ordinarily obtain equipment through commercial business-to-business dealers, distributors, and contractors. Downstream target markets are offices, retail, grocery, hospitality, restaurants and warehouses. The direct-install services likewise engage a diverse range of small businesses such as offices, independent retail shops, gas stations, restaurants, shopping center stores, convenience stores, and micro-businesses.

This group of customers is considered hard-to-reach because the cost to provide services often does not exceed the savings and avoided cost benefits for the activity. The SNEEP delivery channels attempt to affect this outcome while overcoming the sector's significant barriers to program participation. The targeted market is challenged by meeting day-to-day cash requirements of their businesses, they focus on equipment "first-cost" out-of-pocket expenses and less on future life-cycle costs. Business owners often lack energy efficiency expertise and must address many competing priorities. Some small business owners are not native English speakers and do not understand the intricacies of energy efficiency.

Program Description:

SNEEP downstream incentives provides a simplified method to make efficient choices on pre-defined energy efficiency measures without requiring complex analysis or participation rules. Incentives and claimed savings are based on a combination of predetermined

technologies and encoded calculation methods for existing equipment. The prescriptive component covers the majority of common energy-saving measures across most customers and end uses. Participants can choose from a menu of incentives for a wide range of pre-defined end uses, such as lighting, HVAC, variable frequency drives (VFD), commercial plug load, and kitchen and refrigeration equipment. The downstream activities include virtual commissioning and tailored or "custom" measures to meet site-specific needs and savings opportunities.

Projected Small-Medium Downstream Savings Impacts:

	PY18	PY19	PY20	PY21	PY22	Total
MWh	3,480.5	3,863.3	4,416.3	4,939.1	4,121.9	20,821
MW	0.6	0.7	0.8	0.8	0.7	3.6

SNEEP provides midstream incentives directly to distributors and manufacturers, rather than to end users. Incentives target efficient products, offsetting the higher costs, increasing product availability, and effectively driving uptake of the most efficient equipment options. Incentives are structured to mitigate the price premium between conventional and high-efficiency products but can mitigate adoption barriers that go beyond first cost. By working with market actors directly, equipment stocking patterns are altered over time to move inefficient products off the shelves and to enable faster adoption and decreased customer costs for efficient equipment.

Projected Small-Medium Midstream Savings Impacts:

	PY18	PY19	PY20	PY21	PY22	Total
MWh	8,358.2	9,277.3	10,605.3	11,860.7	9,898.5	50,000.0
MW	1.3	1.4	1.6	1.8	1.5	7.5

SNEEP direct-install actions are turnkey, end-to-end solutions that include free energy assessments, simple proposals, and direct installation of energy-efficient technologies conducted by a third-party implementation contractor. Face-to-face interaction with customers is required to explain this program and to overcome objections regarding its validity (i.e., "it is too good to be true"). The program's incentives are designed to encourage early equipment replacement and target discretionary retrofit opportunities among small business customers.

Projected Small-Medium Direct-Install Savings Impacts:

	PY18	PY19	PY20	PY21	PY22	Total
MWh	865.8	961.0	1,098.6	1,228.6	1,025.4	5,179.4
MW	0.1	0.1	0.1	0.2	0.1	0.7

SNEEP Measures:

Downstream measures include HVAC equipment (heat pumps and unitary packaged equipment), refrigeration tune-up, HVAC-tune-up, controls, electronically commutated

motors (ECM), ECM fans, variable frequency drives (VFD) for HVAC and pumping, process fans and process pumps.

Midstream measures include lighting, lighting controls, packaged and unitary air conditioning and heat pumps, chilled water systems high-efficiency pumping system, air compression systems and controls as well as a host of commercial food services measures (ice machines, steam cookers, ovens, fryers, holding cabinets, griddles, cooktops and dishwashers)

Direct-install measures include power strips, rooftop controls, demand-controlled ventilation, compressed air system components, refrigeration system measures, food services equipment (above), lighting, lighting controls, VFDs, ECMs

See Table 8 Eligible Measures for a complete listing of measures and range for incentives.

Implementation Strategy:

SNEEP Downstream Implementation Strategy:

SNEEP Downstream provides customers with ongoing, one-on-one guidance for identifying comprehensive energy efficiency opportunities, assisting with the application and implementation process, obtaining technical assistance, and coordinating with trade allies on projects to create a cohesive program delivery. Through this channel SNEEP recruits and engages trade allies, which are an important source of prospective projects. The implementation strategy includes:

- Account-based marketing that targets decision-makers to increase awareness, encourage enrollment, and move the best prospects toward participation.
- One-on-one outreach to raise awareness, engage customers and trade allies, and deliver the highest quality customer experience.
- Engaging and training trade allies to increase participation and contribute to market transformation.
- Engineering support services, tools, and information provided to trade allies and customers.
- Quality assurance and quality control through randomized on-site project verification and M&V.

Given the changes to Pennsylvania's commercial lighting market over the last several years, the initiative will focus on networked lighting controls (NLC) with commissioning. NLC are controls that are networked, addressable, and utilize software or intelligent controllers to combine multiple lighting control strategies in a single space. The implementer works with manufacturers and their regional representatives to build the local market by promoting NLC technologies and educating customers and local trade allies. For HVAC efficiency, the CSP will promote advanced rooftop unitary controls, demand-controlled ventilation, and a "tune and save" package verified with smart thermostat and building management system data.

SNEEP Midstream Implementation Strategy:

The Implementation contractor delivers the program as a turnkey solution and serves as a single point of contact for distributors and manufacturers. The CSP also issues and maintains participation agreements, identifies and enrolls targeted suppliers, provides training, processes applications, tracks and reports on program activity, and supports program EM&V. Initial engagement targets organizational CEOs and sales managers to discuss opportunities for increasing inventories, by incorporating proven sales strategies, and to get full buy-in throughout an organization. Prior to signing a participation agreement, the CSP ensures that distributors meet program criteria, and then during the enrollment process, the CSP learns distributors' business models and challenges and engages staff across the entire organization.

The initiative provides both passthrough incentives and flexible distributor incentives that are used to mitigate risk and capitalize on opportunities. Flexible incentives can be passed through to end use customers, offset stocking charges, motivate sales representatives or address other perceived risks to supply chain actors. The utilization of flexible incentives tends to change over time as participating distributors identify and mitigate the risks and opportunities for their business. Both passthrough and flexible incentives are considered "Customer Incentives" analogous to incentives that offset installation costs in other portfolio contexts as the energy savings opportunity may not occur without this market support.

To document lighting baselines, a customer affidavit is completed for lighting projects. The lighting measures target a specific subset of products that provide both baseline and control savings to maximize impacts. The Program may adjust an incentive offer based on actual or projected participation levels while maintaining program cost effectiveness or increasing customer value.

SNEEP Direct-Install Implementation Strategy:

Phase V builds on proven approaches from previous phases, while introducing targeted enhancements to improve program performance and customer experience. The implementation contractor delivers services as the single point of contact. Direct install delivery is a traditional form of energy efficiency delivery to small business customers consisting of the following:

- No-cost energy assessments that can occur while the business maintains operations.
- A simple-to-understand proposal with key opportunities and costs for energy retrofit upgrades.
- A proposal with recommendations for efficiency measures and the direct installation of certain low-cost measures.
- The implementer obtaining the customer's written approval and facilitating equipment installation by pre-selected contractors.
- Incentives cover up to 80 percent of equipment and installation costs.
- Proper disposal of used equipment.
- Quality assurance and quality control through randomized on-site project verification.

The CSP utilizes a pre-qualified pool of local installation contractors. Qualified customers participate by contacting the program implementation contractor who performs a

complementary audit. Using the audit data, the CSP generates a proposal with estimated energy savings information, Duquesne Light's incentives, and the customer's share of the cost on the spot for each customer. This cost-share structure ensures customers are invested and committed to the project. Upon acceptance, the contractor schedules the work and installs the measures. Following installation, the installation contractor collects only the customer's share of the project's cost and Duquesne Light then pays the incentive directly to the implementation contractor.

During Phase V, expected changes throughout the program years include the introduction of Small Business Starter Kits for immediate savings, expanded measure bundles, and enhanced virtual commissioning to maximize energy savings and persistence. Additional contractor training, refreshed marketing materials, and advanced assessment tools will also be deployed to address emerging market needs. Sector-specific, multilingual outreach and streamlined enrollment, supported by a designated program point of contact and digital self-service tools, will ensure hard-to-reach and underserved business corridors are actively engaged. Partnerships with local trade allies and community organizations will be leveraged to accelerate project origination and deeper measure adoption.

Program Issues, Risks and Risk Management Strategy: Program elements have been implemented successfully in several Act 129 phases program risk is mitigated by replicating proven approaches and processes. All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warnings regarding program under- or over-subscription. CSP implementation contract statements of work include pay-for-performance compensation. Provisions in CSP contract language provide for shifting funds from under-performing programs. Duquesne Light reserves the right to hire multiple CSPs should any single CSP not be able to meet program requirements or if Duquesne Light determines it is appropriate to deliver some program elements directly.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers:

SNEEP Downstream incentive levels have historically averaged approximately one-third of efficient product incremental costs, initially set targeting a simple payback period of 2 years. Incentive levels were then adjusted to be approximately consistent with statewide treatment and as needed to promote program participation. As was the case in Phase IV, the Phase V Implementation Order[28] requirement for at least 50% of EE&C Plan spending, at the Plan level, to come from incentives has caused incentive levels to increase.

SNEEP Midstream: Incentives are provided to distributors as passthrough and/or flexible incentives depending on the measure and sector; discounts are applied at the point of sale providing reduced initial cost and increased product availability. Measure incentives are structured to mitigate the price premium between conventional and high-efficiency products. Incentive levels range by end-use with lighting offers covering approximately 40% of the cost, and non-lighting offers covering 15 to 20% of the incremental cost. With higher unit costs for non-lighting equipment and limited ability to offset those costs, a flexible incentive

[28] PA Public Utility Commission Energy Efficiency and Conservation Program Implementation Order, Docket No. M-2025-3052826, June 18, 2025, Section H.1: Determination of Phase V Allowable Costs, page 231.

is a strong tool to influence the supply chain to stock and sell higher efficiency equipment which also secures operational savings for the customer.

SNEEP Direct-Install participants receive a free energy assessment to identify cost-effective opportunities for saving energy and can receive a limited quantity of no-cost energy-saving products for immediate savings. The incentive levels are set so that the program will cover up to 80 percent of the total installed cost, requiring customers to pay 20 percent of the cost. Participating customers may have to pay for the installation of non-standard program measures and incidental project costs not directly associated with implementation of pre-approved program measures.

Ramp-up Strategy: This program was implemented in Phases II, III, and Phase IV, so Phase V program ramp-up will be minimized by replicating many of the proven approaches and processes. Implementation service RFPs will be issued, responses reviewed, and contract statements of work executed according to the implementation schedules provided in Section 12. See Figure 1: Program Ramp Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy:

For the SNEEP Downstream engagement channel, the most successful avenue for marketing comes from one-on-one communication with customers using dedicated program field staff in partnership with local trade allies. In past program cycles, trade allies have helped identify opportunities and gauge customer interest in pursuing individual efficiency upgrades or a comprehensive plan of upgrades, and field staff have leveraged their long-term relationships with customers, their knowledge, and their analysis of customer data (e.g., energy use, demand, sector analysis) to generate projects. Trade allies such as equipment vendors, consulting engineers, and energy service companies or channel partners have been key actors in promoting, identifying, and delivering services to customers.

SNEEP Midstream offerings are marketed primarily by the implementation CSP that develops and delivers presentations to distributors and manufacturers through a combination of phone calls, personal emails, webinars, and in-person visits to maximize market share. Presentations demonstrate the financial benefits of promoting high-efficiency measures, from increased sales revenue and program incentives. Additionally, the implementation CSP conducts outreach through participation in and memberships with selected key trade associations, attendance at key trade shows, and training event sponsorships. The CSP will craft program participation messages for key customer decision-makers by leveraging electronic collateral, including customer spotlights, brochures, and fact sheets. Available services are also posted on Duquesne Light’s Act 129 website.

SNEEP Direct-Install relies on cold calls and walk-in contact. The implementation CSP identifies hard-to-reach customers by analyzing customer data and prioritizing these customers by geography, energy intensity, and business type. Armed with a list of potential customers, the CSP canvases small businesses quickly by going door-to-door. The CSP supplements door-to-door sales with direct mailings and targeted digital marketing campaigns to raise awareness before reaching the door to "warm up" the audience and enable the CSP to approach small businesses more effectively. The marketing strategy for Phase V

will utilize sector-based, multilingual outreach. Available services are posted on Duquesne Light's Act 129 website. Additionally, the CSP conducts outreach through participation in and memberships with selected key trade associations, attendance at key trade shows, and training event sponsorship.

Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions and Incentive Levels: See Section 11, Table 8.

Maximum Deadline for Rebates: Midstream Incentives offer rebates at the point of sale at participating distributors; no rebate deadlines are applicable. Downstream energy efficiency rebates are subject to an application deadline of 180 days from the date of purchase and installation.

Program Start Date and Key Milestones: Refer to Section 12 Chart 2: Small Commercial and Industrial Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commissions Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on cost of the project (as no customer incentives are provided). Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes three dedicated full-time employees to perform management and coordination of all Act 129 commercial and industrial sector programs. The Customer Program Associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services.

SNEEP Savings Targets and Estimated Participation:[29]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	12,705	14,102	16,120	18,028	15,046	76,000
MW	2.0	2.2	2.5	2.8	2.3	11.7
Participation	27,887	30,954	35,384	39,573	33,026	166,825

SNEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	4,374,562	4,855,612	5,550,649	6,207,731	5,180,724	$26,169,278
Incentives	2,110,159	2,342,202	2,677,468	2,994,424	2,499,027	$12,623,280
Percent Incentives	48.2%	48.2%	48.2%	48.2%	48.2%	48.2%
Percent Non-Incentives	51.8%	51.8%	51.8%	51.8%	51.8%	51.8%

[29] Participation is units of measures installed.

SNEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	**PY19**	**PY20**	**PY21**	**PY22**	Total
Small-Medium C&I Sector	$4,374,562	$4,855,612	$5,550,649	$6,207,731	$5,180,724	$26,169,278
All Small-Medium Efficiency	$4,374,562	$4,855,612	$5,550,649	$6,207,731	$5,180,724	$26,169,278
Percent Sector Budget	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

SNEEP Cost Effectiveness:

- Gross TRC: 2.63
- NTG Ratio: 82.3%
- Net TRC: 2.16

3.4. Large Commercial & Industrial Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).

Large Commercial/Industrial Sector Programs include formatted descriptions of each program organized under the same headings as listed previously for residential and small commercial and industrial sector programs. Customers served under this sector are commercial and industrial customers having a monthly max billing demand of ≥ 300 kW over the prior 12 months. To best serve large business customers, Duquesne Light offers a suite of solutions designed to influence customer behavior and purchasing decisions as described in the following pages.

3.4.1. Large Commercial Sector Energy Efficiency Program

Program Title and Program Years: Large Commercial Energy Efficiency Program (CEEP) will be implemented during program years 2026 through 2031.

Objectives: The CEEP is a downstream program that provides Duquesne Light's large commercial customers interested in reducing their energy consumption with streamlined access to energy efficient technologies and improvements in operational processes that result in measurable energy and demand savings. This program is designed to influence the selection of high-efficiency equipment in retrofit, new construction, and end-of-life replacement scenarios by offering expedited, quantifiable, and easy-to-understand incentive options.

The program aims to reduce or bypass common barriers to participation, such as lack of energy efficiency information, limited access to qualified vendors and installers, and challenges in quantifying savings or securing capital. Through both prescriptive and custom incentive tracks, the program supports a flexible approach that accommodates a wide range of technologies and project types, enabling large business customers to implement efficient solutions tailored to their operational needs. The program also emphasizes sector-based outreach and partnerships with trade allies to maximize participation and ensure that energy and cost savings are realized across diverse market segments.

Target Market: The CEEP Program targets Duquesne Light's large commercial customers with a monthly max billing demand of ≥ 300 kW over the prior 12 months and targets all cost-effective energy efficiency retrofit and time-dependent opportunities. Program marketing has a sector-based focus, targeting specific energy efficiency opportunities within primary customer sectors, such as offices, retail, grocery, hospitality, restaurants and warehouses.

The program continues to target partnerships within the trade ally community. These trade allies are true stakeholders in the process and typically have established relationships and contacts with customers. The selected CSP continues to recruit trade allies and provide training and support to these key players that help spread the program's message and deliver solutions to large commercial customers.

Program Description: The CEEP helps Duquesne Light's large commercial customers and/or their trade allies select the most efficient electric technologies when they consider purchasing new equipment or retrofitting existing inefficient technologies. CEEP offers two core participation tracks: prescriptive and custom.

The prescriptive component offers a simplified method to make efficient choices on pre-defined energy efficiency measures without requiring complex analysis or participation rules. Incentives and claimed savings are based on a combination of predetermined technologies and encoded calculation methods for existing equipment. The prescriptive component covers the majority of common energy-saving measures across most customers and end uses. Participants can choose from a menu of incentives for a wide range of pre-defined end uses, such as lighting, HVAC, variable frequency drives (VFDs), commercial plug load, and kitchen and refrigeration equipment.

The custom component makes it possible to include more complex and site-specific measures and projects. Custom incentives enable more comprehensive approaches to energy savings, which often occur in major renovation and new construction projects. The custom component is available for energy efficiency technologies or multi-measure projects that do not fall under the prescriptive component, ranging from complex commercial HVAC projects to industrial process improvements. Custom projects must be able to show specific and verifiable energy savings and costs, typically developed by a third-party firm.

Program components include energy use auditing, provision of targeted financing and incentives, project management and retrofit measure installation, training, and technical assistance. Energy audits results provide business customers a readily available, reliable source of information about their energy use and outline ways to save energy that, when implemented, will result in energy savings, reduced operating costs, lowered carbon emissions, and improved air quality.

Implementation Strategy: The CEEP provides customers with ongoing, one-on-one guidance for identifying comprehensive energy efficiency opportunities, assisting with the application and implementation process, obtaining technical assistance, and coordinating with trade allies on projects to create a cohesive program delivery. The CSP also recruits and engages trade allies, which are an important source of prospective projects. The implementation strategy includes:

- Account-based marketing that targets decision-makers to increase awareness, encourage enrollment, and move the best prospects toward participation.
- One-on-one outreach to raise awareness, engage customers and trade allies, and deliver the highest quality customer experience.
- Engaging and training trade allies to increase participation and contribute to market transformation.
- Engineering support services, tools, and information provided to trade allies and customers.
- Quality assurance and quality control through randomized on-site project verification and M&V.

Retrocommissioning (RCx), Monitoring-Based Commissioning (MBCx), Virtual Commissioning (VCx) and Strategic Energy Management (SEM)/Virtual SEM (vSEM) Solutions. RCx/MBCx/VCx and SEM/vSEM provide large commercial customers with an additional layer of energy-saving opportunities beyond equipment solutions. RCx/MBCx and SEM/vSEM Solutions target existing commercial facilities with energy savings opportunities related to facility or process operations and maintenance.

Technology and Operations Focus. Given the drastic changes in Pennsylvania's commercial lighting market over the last several years, the CSP will focus on controls savings and technologies such as networked lighting controls (NLC) to generate savings. NLC are controls that are networked, addressable, and utilize software or intelligent controllers to combine multiple lighting control strategies in a single space. Additionally, the CSP will seek to pair prescriptive upgrades (NLC adders, variable frequency drives) with custom plant and controls optimization, MBCx, and SEM/vSEM to lock in persistence and on-peak reductions.

Program Issues, Risks and Risk Management Strategy: The CEEP's core design was implemented successfully in all prior phases, Phase V program risk is mitigated by replicating proven approaches and processes. All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warnings regarding program under- or over-subscription. CSP implementation contract statements of work include pay-for-performance compensation. Provisions in CSP contract language provide for shifting funds from under-performing programs.

The CSP will continue to transfer program data for review, verification, and submission into Duquesne Light's PMRS. All of these program elements have been operating during the previous Act 129 Phases. These activities are not new to Duquesne Light's implementation team. Implementation CSP contract statements of work are performance-based, include production schedules, and performance payments are tied to independent measurement.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers: CEEP Downstream incentive levels have historically averaged approximately one-third of efficient product incremental costs, initially set targeting a simple payback period of 2 years. Incentive levels were then adjusted to be approximately consistent with statewide treatment and as needed to promote program participation. As was the case in Phase IV, the Phase V

Implementation Order requirement for at least 50% of EE&C Plan spending, at the Plan level, to come from incentives has caused incentive levels to increase.

Ramp-up Strategy: Phase V program ramp-up will be minimized by replicating many of the proven approaches and processes from prior Act 129 program phases. See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: Though a variety of marketing approaches are employed, experience has established that the most successful avenue for marketing comes from one-on-one communication with customers using dedicated program field staff in partnership with local trade allies. Throughout past program cycles, trade allies have helped identify opportunities and gauge customer interest in pursuing individual efficiency upgrades or a comprehensive plan of upgrades, and field staff have leveraged their long-term relationships with customers, their knowledge, and their analysis of customer data (e.g., energy use, demand, sector analysis) to generate projects. Trade allies—such as equipment vendors, consulting engineers, and energy service companies or channel partners—have been key actors in promoting, identifying, and delivering services to customers.

To support one-on-one outreach, the marketing plan includes:

- Targeting key market segments. Using market segmentation research, including market verticals, the implementer allocates program personnel by subject-matter expertise to key markets for better penetration.
- Participating in associations. The CSP conducts outreach through participation in and memberships with selected key trade associations and attendance at key trade shows, reaching a large number of potential customers in one place. Market segmentation data helps refine which associations provide maximum benefits.
- Supporting trade allies. Engaging trade allies is another key way of raising awareness, improving participation rates, and contributing to market transformation. Trade allies are an extension of the program team and provide customers with expertise. The implementer supports trade allies with training, program staff to assist them, and marketing materials and enables them to provide continuous feedback on the program.
- Delivering a paid media campaign. As with Phase IV, the CSP will utilize a paid media campaign to raise awareness before reaching the door. This campaign will "warm up" the audience and enabled the CSP to approach small businesses more effectively. This campaign will include print and digital media.
- Providing access to online marketing/website. Available services will be posted on Duquesne Light's Act 129 website. Emails and digital tactics drive traffic to the site and emphasize how to participate in the program. Customers may also access incentive applications from Duquesne Light's website.
- Hosting events. The CSP will hold events throughout the year that cover all small business sectors to raise awareness and encourage greater program participation. Event efforts will focus on sponsorships, partnerships, speaking opportunities, and event attendance.

- Distributing Collateral. The CSP will craft program participation messages for key customer decision-makers by leveraging print collateral, including customer spotlights, brochures, and fact sheets.

Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions and Incentive Levels: See Section 11, Table 8.

Maximum Deadline for Rebates: Duquesne Light will assess rebate deadlines on a case-by-case basis. The maximum deadline to pay rebates by the CEEP will generally be 180 days from the date of installation of eligible energy efficiency measures. However, this time frame may not be appropriate for particularly large or complex projects, such as CHP projects, which may take 18 months or more between project commitment and final measurement. For large, complex and expensive projects, Duquesne Light will closely monitor and document installation and timing of commissioning and commercial operation. The project is not done when the customer reports it or based on the date of an invoice; the project is complete when Duquesne Light, or its designated CSP, performs site-verification and attests to the project completion.

Program Start Date and Key Milestones: Refer to Section 12 Chart 3: Large Commercial and Industrial Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 commercial and industrial sector programs. The Customer Program Associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services.

CEEP Savings Targets and Estimated Participation:[30]

	PY18	PY19	PY20	PY21	PY22	Total
MWh	7,500.0	8,750.0	11,250.0	13,750.0	8,750.0	50,000.0
MW	1.3	1.5	1.9	2.3	1.5	8.504
Participation	11,975	13,971	17,970	21,954	13,971	79,834

[30] Participation for Large Commercial and Large Industrial Business Solutions programs is represented in projected measures delivered.

CEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	1,373,989	1,602,987	2,060,984	2,518,980	1,602,987	$9,159,927
Incentives	578,808	675,276	868,212	1,061,148	675,276	$3,858,721
Percent Incentives	42.1%	42.1%	42.1%	42.1%	42.1%	42.1%
Percent Non-Incentives	57.9%	57.9%	57.9%	57.9%	57.9%	57.9%

CEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Large Commercial Sector	$1,373,989	$1,602,987	$2,060,984	$2,518,980	$1,602,987	$9,159,927
Large Commercial Efficiency	$1,373,989	$1,602,987	$2,060,984	$2,518,980	$1,602,987	$9,159,927
Percent Sector Budget	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

CEEP Cost Effectiveness:

- Gross TRC: 2.56
- NTG Ratio: 89.9%
- Net TRC: 2.49

3.4.2. Large Industrial Energy Efficiency Program

Program Title and Program Years: The Large Industrial Downstream Initiative (Industrial Energy Efficiency Program or IEEP) will be implemented during program years 2026 through 2031.

Objectives: To provide large industrial customers with a broad selection of energy efficiency measures across multiple end uses in order to achieve minimum verified gross energy savings of 40,000 MWh and 7.2 MW for the IEEP over the five-year phase, while maintaining high customer satisfaction.

Target Market: Large industrial customers are here defined as those having a monthly max billing demand of ≥ 300 kW over the prior 12 months, with a focus on industries common to Duquesne Light's service area, such as primary metal manufacturing and fabricated metal products, as well as food processing, chemicals, pharma, biotech, and plastics manufacturing, data centers, and others.

Program Description: The IEEP will serve Duquesne Light's large industrial customers (monthly max billing demand of ≥ 300 kW over the prior 12 months) in Pittsburgh and in Allegheny and Beaver counties. The program will focus on industrial facilities, such as primary metal manufacturing and fabricated metal products, as well as food processing, chemicals, pharma, biotech, and plastics manufacturing, data centers, and others. These sites have complex systems and significant opportunities for prescriptive and custom energy efficiency projects, including load shifting and process optimization.

The program will offer prescriptive and custom elements, with demand saving opportunities woven throughout. It will target electric end uses that present high potential for energy

efficiency improvements, such as lighting, motors and drives, compressed air, HVAC, refrigeration, process optimization, and process heating and cooling. Projects will be identified through comprehensive energy efficiency audits to identify actionable projects tailored to each site's unique systems. Robust marketing and trade ally engagement will drive project completion. A call center will provide ongoing support.

Customers with high energy savings potential and site engagement will receive hands-on support and use of an energy management platform to track projects and energy savings. Sites with fewer opportunities will benefit from ongoing access to flexible energy management training modules and quarterly workshops designed to support continuous improvement. All enrolled customers will receive access to technical support and energy management training modules on demand. The program will also include comprehensive marketing and trade ally engagement and training to enhance program outcomes.

Implementation Strategy: The program will use targeted outreach and tailored messaging to engage industrial customers, focusing on segments with high energy savings potential. Marketing efforts will be multi-channel, including digital content, outreach materials, and trade ally engagement, all designed to drive participation and satisfaction. Trade allies will play a key role in outreach and project delivery, supported by training, tools, and a dedicated webpage to improve visibility and access.

Customer engagement will be customized based on readiness and opportunity. High-potential sites will receive hands-on support, including site assessments and access to an energy management platform for tracking projects and savings. Other facilities will benefit from flexible, on-demand training and workshops.

Over time, the program is expected to evolve based on performance data and market feedback. Adjustments may include shifting certain measures from custom to prescriptive to streamline participation, refining incentive structures to improve project completion rates, and enhancing reporting systems. Continuous improvement, strong relationships, and proactive pipeline development will ensure the program remains effective and responsive throughout its duration.

Program Issues, Risks and Risk Management Strategy: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program incentives, potential impacts and provides early warning regarding program under- or over-subscription.

Three potential issues and their risk management strategies include:

- Engagement level of existing trade ally network: Low engagement can be mitigated by performing a "listening tour" of one-on-one meetings with each trade ally firm.
- Third Party evaluation: Risks in working with a new evaluator may be mitigated by engaging in early communication, fostering a collaborative environment, and inviting early input on proposed M&V plans.
- Varying Customer Interest: for various reasons, a customer's attention to energy efficiency programs can increase or decrease throughout the program cycle, leading

to business slowdown or significant ramp up. The program will mitigate this issue by ensuring outreach to a diverse base, so if one segment is impacted, savings can still be achieved across the program.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers: Many of the services, such as SEM and Virtual Commissioning, are provided at no cost to the participant. IEEP Downstream incentive levels have historically averaged approximately one-third of efficient product incremental costs, initially set targeting a simple payback period of 2 years. Incentive levels were then adjusted to be approximately consistent with statewide treatment and as needed to promote program participation. As was the case in Phase IV, the Phase V Implementation Order[31] requirement for at least 50% of EE&C Plan spending, at the Plan level, to come from incentives has caused incentive levels to increase.

Ramp-up Strategy: Phase V program ramp-up will be minimized by replicating many of the proven approaches and processes from prior Act 129 program phases. See Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy: The program launch centers on implementing a comprehensive, DLC-approved marketing strategy designed to drive industrial customer enrollment at no cost to participants. The approach emphasizes understanding customer operations and communicating benefits that matter most to end users. Marketing efforts will include research, segmentation, outreach materials, digital content, and trade ally engagement.

Audience segmentation is based on industry type, energy usage, and program fit, allowing for tailored messaging and outreach strategies. Marketing efforts will use a multi-channel approach—email, social media, geofenced ads, events, and trade ally networks—to reach decision-makers with relevant, plain-language content backed by proof points and success stories. A mobile-friendly, multilingual website will serve as the digital hub, simplifying enrollment and connecting customers to trade allies and financing options. Available services are also posted on Duquesne Light's Act 129 website.

Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions and Incentive Levels: See Section 11, Table 8.

Maximum Deadline for Rebates: Duquesne Light will assess rebate deadlines on a case-by-case basis. The maximum deadline to pay rebates by the CEEP will generally be 180 days from the date of installation of eligible energy efficiency measures. However, this time frame may not be appropriate for particularly large or complex projects, such as CHP projects, which may take 18 months or more between project commitment and final measurement. For large, complex and expensive projects, Duquesne Light will closely monitor and document installation and timing of commissioning and commercial operation. The project is not done when the customer reports it or based on the date of an invoice; the project is complete with Duquesne Light, or its designated CSP, performs site-verification and attests to the project completion.

[31] PA Public Utility Commission Energy Efficiency and Conservation Program Implementation Order, Docket No. M-2025-3052826, June 18, 2025, Section H.1: Determination of Phase V Allowable Costs, page 231.

Program Start Date and Key Milestones: Refer to Section 12 Chart 3: Large Commercial and Industrial Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements: The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 commercial and industrial sector programs. The Customer Program Associates will administer the program on a shared basis with additional part-time support by engineering, marketing, purchasing, regulatory, legal, data processing and clerical staff, as well as contracted CSP services.

IEEP Savings Targets and Estimated Participation:

	PY18	PY19	PY20	PY21	PY22	Total
MWh	4,109	6,922	8,843	9,605	10,521	40,000.0
MW	0.548	0.922	1.178	1.280	1.402	5.329
Participation	3,443,138	5,799,622	7,409,523	8,047,628	8,815,230	33,515,141

IEEP Estimated Program Budget:

	PY18	PY19	PY20	PY21	PY22	Total
Program Cost	1,603,421.9	2,700,803.6	3,450,512.1	3,747,668.7	4,105,130.5	$15,607,537
Incentives	1,037,239.5	1,747,126.1	2,232,106.0	2,424,334.0	2,655,572.9	$10,096,379
Percent Incentives	64.7%	64.7%	64.7%	64.7%	64.7%	64.7%
Percent Non-Incentives	35.3%	35.3%	35.3%	35.3%	35.3%	35.3%

IEEP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	PY19	PY20	PY21	PY22	Total
Large Industrial Sector	$1,603,422	$2,700,804	$3,450,512	$3,747,669	$4,105,131	$15,607,537
Large Industrial Efficiency	$1,603,422	$2,700,804	$3,450,512	$3,747,669	$4,105,131	$15,607,537
Percent Sector Budget	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

IEEP Cost Effectiveness:

- Gross TRC: 4.40
- NTG Ratio: 89.9%
- Net TRC: 4.17

3.5. Government/Nonprofit/Institutional Sector (as defined by 66 Pa. C.S. § 2806.1) – Qualitatively describe how the Government/Nonprofit/Institutional (GNI) Sector will be served. Highlight any key differences in the planned program delivery strategy between the GNI and C&I sectors.

Program Title and Program Years: The Public Agency Partnership Program (PAPP) will be implemented during program years 2026 through 2030.

Objectives: PAPP engages local government in a partnership to implement an Energy Efficiency Action Plan. The program will systematically inventory potential for energy efficiency improvements in local government departments and jurisdictional agencies. It will execute project agreements to co-fund identified energy efficiency projects.

Target Market: Consistent with Act 129, the Public Agency Partnership Program serves customers that includes federal, state and local governments, municipalities and school districts as well as healthcare systems, institutions of higher education and other non-profit entities.

Program Description: Public Agency Partnerships are established through execution of a Memorandum of Understanding (MOU) by and between Duquesne and selected local governmental agencies. The MOU establishes working groups comprised of Duquesne and agency representatives that identify project areas within agency departments (and jurisdictional agencies). Working groups define project scopes of service and establish project agreements to co-fund agreed to projects. The project agreements between Duquesne Light and Partnership agencies contain the terms to leverage local agency staff to reach, pre-screen and enroll program participants. The utility and the agency split specified program costs. The Partnership MOU puts in place dedicated contacts and a working group structure to identify and evaluate energy efficiency project opportunities within all governmental departments and sub-agencies.

Implementation Strategy:

Key elements of the implementation process follow (1) Duquesne Light executes a Partnership MOU with the Public Agency (2) Duquesne Light facilitates working group meetings with the Public Agency and jurisdictional agencies (3) the working group collaborates on the development proposed project concept papers (4) public agency working group members obtain feedback on the proposed projects and the working group makes necessary adjustments to the concept paper (5) Duquesne Light prepares a project agreement and resolution for approval by the public agency governing body (6) Duquesne Light and the public agency implement the project plan consistent with the terms of the project agreement.

Patterned after successful programs operating in other parts of the country, a key element of the PAPP is co-funding by Duquesne Light and the Partnership agency of energy efficiency audits and measure implementation. PAPP will utilize local contractors and/or other survey and installation entities based on availability, cost, and quality of service. Whenever possible, PAPP will utilize non-profit, community-based organizations to perform the energy efficiency surveys and measure installation.

Program Issues, Risks and Risk Management Strategy:

All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warning regarding program under- or over-subscription. The PAPP was implemented successfully in both Phases I and II, and III, Duquesne Light assigns minimal developmental risks associated with implementing this program.

Basis for the Proposed Level of Incentives and Anticipated Cost to Participating Customers:

PAPP Partners will fund portions of identified energy efficiency projects consistent with adopted project agreements.

Ramp-up Strategy:

This program was originally launched on December 1, 2009 and continued through Phase III ending May 2021. PAPP was discontinued in Phase IV when the mandatory GNI carve-out was eliminated, but this resulted in fewer comprehensive projects implemented by this sector. In Phase V the proven program is brought back to address key unique barriers. Duquesne Light has many existing agreements and relationships with its governmental counterparts, no extended ramp-up is anticipated, see Figure 1: Program Ramp-Rates for projected energy savings for each year of the Phase V performance period.

Marketing Strategy:

Local government agencies are engaged directly by Duquesne Light under the local government partnership model. Each partnering agency assists in communicating with all governmental departments and jurisdictional agencies.

Eligible Measures and Incentive Strategy showing Incremental Cost Assumptions and Incentive Levels: See Section 11, Table 8

Maximum Deadline for Rebates:

Duquesne Light will assess rebate deadlines on a case-by-case basis. The maximum deadline to pay rebates by the PAPP will generally be 180 days from the date of installation of eligible energy efficiency measures. However, this time frame may not be appropriate for particularly large or complex projects, such as water and wastewater treatment plant projects, which may take 18 months or more between project commitment and final measurement. For large, complex and expensive projects, Duquesne Light will closely monitor and document installation and timing of commissioning and commercial operation. The project is not done when the customer reports it or based on the date of an invoice; the project is complete with Duquesne Light, or its designated CSP, performs site-verification and attests to the project completion.

Program Start Date and Key Milestones: Refer to Section 12 Chart 3, Large Commercial / Industrial Portfolio Program.

Assumed EM&V Requirements to Document Savings by the Commission's Statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities will be identified in the Phase V EM&V Plan. Either enhanced or basic rigor verification is employed based on project scope, as identified in the EM&V Plan. Random samples shall comply with SWE Audit Plan confidence and precision levels.

Administrative Requirements:

The Duquesne Light Customer Programs organization staffing plan includes two dedicated full-time employees to perform management and coordination of all Act 129 commercial and

industrial sector programs that include governmental/educational and nonprofit segments (see Figure 3 or 47). The Commercial Program Coordinator will administer the program, with support by the C&I Program Coordinator. A specialized implementation CSP will be selected by competitive solicitation and will support utility staff by providing direct customer interface, project development and engineering services as well as facilitating project meetings and logistical support. In the conduct of program management and oversight, Duquesne Light's Customer Programs organization staff will also be supported by additional part-time engineering, marketing, purchasing, regulatory, data processing and clerical staff. Program administrative costs are shown in the following Projected Program Budget table.

PAPP Savings Targets and Estimated Participation:

	PY18	**PY19**	**PY20**	**PY21**	**PY22**	**Total**
MWh	4,449.4	4,780.2	4,999.7	5,156.4	5,318.6	24,704.3
MW	0.568	0.694	0.726	0.694	0.473	3.155
Participation	7,104	7,632	7,983	8,233	8,492	39,445

PAPP Estimated Program Budget:

	PY18	**PY19**	**PY20**	**PY21**	**PY22**	**Total**
Program Cost	$2,000,757	$2,445,370	$2,556,523	$2,445,370	$1,667,297	$11,115,316
Incentives	$1,310,753	$1,602,032	$1,674,851	$1,602,032	$1,092,294	$7,281,962
Percent Incentives	65.5%	65.5%	65.5%	65.5%	65.5%	65.5%
Percent Non-Incentives	34.5%	34.5%	34.5%	34.5%	34.5%	34.5%

PAPP Estimated Percentage of Sector Budget Attributed to Program:

	PY18	**PY19**	**PY20**	**PY21**	**PY22**	Total
GNI	$2,000,757	$2,445,370	$2,556,523	$2,445,370	$1,667,297	$11,115,316
PAPP	$2,000,757	$2,445,370	$2,556,523	$2,445,370	$1,667,297	$11,115,316
Percent Sector Budget	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

PAPP Cost Effectiveness:

- Gross TRC: 2.31
- NTG Ratio: 89.9%
- Net TRC: 2.23

4. Program Management and Implementation Strategies

(The objective of this section is to provide detailed description of how EDC plans to manage and implement programs, including their approach to and use of Conservation Service Providers (CSPs).)

4.1. Overview of EDC Management and Implementation Strategies:

4.1.1. Describe the types of services to be provided by EDC as well as consultants, trade allies, and CSPs. Indicate which organizations will provide which services and the basis for outsourcing versus staffing in-house. Reference reporting and EM&V information from Sections 5 and 6 below.[32]

The delivery organization size and function are largely driven by the portfolio of programs fielded. The portfolio proposed by Duquesne Light is structured under three broad programs: residential, non-residential and behavioral.

The Programs provide incentives for a full range of measures to assist customers of all sizes and in all key market segments to overcome barriers to adopt energy efficiency measures. These programs put in place a baseline program design, with set incentive levels and measure content. The design provides an overarching programmatic structure with calculated incentives for customized projects or itemized incentives for standard measures. Under this structure, each program can promote specific technologies or target specific market segments incorporating specified savings impacts and incentive levels in a consistent and common offering.

Duquesne Light implements programs effectively and economically. To achieve this, it uses CSPs with expertise and experience in program implementation and operations. Success depends on special services offered by CSPs to implement and overcome market segment specific barriers. Duquesne Light works together with CSPs and contractors to provide the services for successful implementation of the plan.

Program implementation requires significant planning and operation management functions. In addition to initiating the contracting process, each contractor is managed and integrated into an organized and cohesive operation. Program procedural guidelines are developed and followed. Documentation is maintained and electronic data structures are developed and managed.

Customers are engaged through at least three channels. First, Duquesne Light promotes the programs to its customers through marketing approaches such as mass media advertising, direct marketing, direct contact, events, conferences, account representatives and electronic media. Second, the Duquesne Light contractors and subcontractors have similar responsibilities, with specific focus on securing commitments for customers to participate in the programs. Third, trade allies, such as builders, architects, engineers, vendors, equipment

[32] Services to be offered by EDC or others may include marketing, customer recruiting, demonstration projects, audits and or installation of new efficiency measures, verification of installations and or baseline usage, response to customer concerns, program tracking and program evaluation.

installation contractors, retailers and others, are informed of the Duquesne Light programs, with the objective of securing their willingness to participate and secure their customers and clients to participate. Trade allies are also engaged, primarily through direct marketing, events, conferences and account representatives.

The programs are designed to overcome key barriers to customer participation. In general, the barriers to greater customer participation in energy efficiency are the need for information, technical assistance, and financial assistance. The programs are also designed to encourage comprehensiveness in terms of including multiple measures, taking account of interactive savings between measures, and advancing new designs and technologies.

Depending on the specific program in the portfolio for Duquesne Light, available services are expected to include:

- Benchmarking of energy use based on utility bills.
- Walk-through energy assessments to pre-screen and qualify the facility to optimize measure selection and implementation.
- Investment grade energy audits for specific measures and energy savings.
- Life-cycle cost-benefit analysis.
- Virtual commissioning.
- Project and construction planning and management.
- Project documentation and operator training.
- Post installation quantification of savings.
- Providing guidance about alternative financing assistance.
- Quantifying environmental benefits.
- Marketing to prospective customers based on leads from Duquesne Light as well as resources of the CSP.
- Educating customers and recruiting participants.
- Conducting walk-through or preliminary energy audits.
- Securing customer approval to proceed with targeted or comprehensive investment grade energy audits.
- Recommending measures with estimates of energy and demand savings.
- Preparing benefit and cost analyses and identification of financing options.
- Completing customer applications to reserve program incentive funds and submitting to Duquesne Light for approval.
- Performing or assisting customers with equipment specification, vendor selection, bidding and project management.
- Conducting post-installation inspections.

- Verifying savings estimates.
- Coordinating applications for incentive payments.
- Conducting project completion and follow-up services.
- Conducting customer satisfaction surveys.

Reporting is conducted based on the requirements of the regulatory authorities, Duquesne Light management and CSPs. Section 5 below presents Duquesne Light's proposed reporting criteria and supporting information systems.

EM&V is conducted for each program. The scope and level will depend on the nature of the program and split of responsibilities between regulatory authorities, Duquesne Light management and CSPs. Section 6 below presents Duquesne Light's approach to EM&V.

4.1.2. Describe how the risk categories of performance, technology, market, policy, and evaluation can affect the programs and any risk management strategies that will be employed to mitigate those risks.[33]

Performance risk refers to the ability of programs to achieve their individual goals in the context of overall corporate goals for Duquesne Light relating to energy efficiency programs. This risk will be mitigated by offering a variety of programs addressing key customer classes and market segments within the customer classes. There are programs for each customer class and subprograms for market segments within the customer class. The programs allow both itemized and customized solutions in terms of measures for commercial and industrial sectors. Comprehensive solutions are encouraged. Performance risk is further mitigated through regular reporting and timely management to identify and resolve issues through the PMRS as described in Section 5. CSP payments as well as incentive reservations and payments are facilitated through PMRS which provides for real-time management of program incentives and progress towards goals. Key performance indices will be created collaboratively between Duquesne Light and its selected CSP for tracking to occur no less than annually.

Technology risk refers to the possibility that energy conservation measures will not perform as well as expected in achieving expected savings. The risk is mitigated by designing programs to foster the installation of proven technologies for the specific energy conservation measure. The program design allows for certain technologies and not others. However, advanced technologies will be encouraged where greater energy savings and cost-effectiveness are expected. The risk is further mitigated by QA/QC performed by Duquesne Light or its implementation contactor as well as activities in EM&V to identify and resolve technology performance concerns.

[33] Performance risk is the risk that, due to design or implementation flaws, the program does not deliver expected savings. Technology risk is the risk that technologies targeted by a program fail to deliver the savings expected. Market risk is the risk that customers, or other key market players (e.g., contractors), choose not to participate in a program. Evaluation risk is the risk that independent EM&V will, based on different assumptions, conclude that savings fall short of what the implementers have estimated.

Market risk refers to the ability to recruit sufficient participants for the programs. Mitigation of market risk is pursued through efforts by Duquesne Light, CSPs, and trade allies to encourage participation by end-use customers. Where barriers to information, technical assistance and financial incentives are identified as continuing issues, adjustments to program designs have been and will continue to be considered to improve participation levels. Market risk is being mitigated during this process of planning and filing for program approval. In Phase IV dialogue with large customers continued and thoughts associated with the Phase V design are included in the proposed programs.

Evaluation risk refers to the possibility that energy savings results are open to question. Mitigation of this risk is achieved by an open and transparent planning process for EM&V. Programs are planned and implemented in a manner to support verification and ensure availability of required evaluation data. The plan should be based on policies and procedures that are widely accepted in the discipline. The risk is mitigated further by implementation of the plan in a collaborative manner and with careful documentation of significant deviations. Finally, issues will continue to be identified and solutions proposed where evaluation risks become real.

Duquesne Light will continue its past practice of sound QA/QC by encouraging participation of its EM&V contractor early in the project process, particularly to gain support and alignment for projects that include new technology or are particularly large or complex.

4.1.3. Describe how EDC plans to address human resource and contractor resource constraints to ensure that adequate personnel and contractors are available to implement the EE&C plan successfully.

Human resource constraints refer to the ability of Duquesne Light to recruit and retain qualified personnel to manage and implement the proposed programs. Duquesne Light has involved individuals within the organization in the planning process for the energy efficiency program. Several programs were specifically designed to leverage the resources of external governmental agencies and community engagement channels. Currently six positions are filled in the department at Duquesne Light. Five of these positions have been in effect since Phase I and the staffing of these positions has been consistent. From a transition from plan-to-plan standpoint, that consistency has added value to the meeting of the mandated goals. Duquesne Light can also draw on employees from other functional groups (e.g., engineering, major accounts, rates, etc.) as needed to address specialized or technical inquiries from customers.

Contractor resource constraints refer to the ability of Duquesne Light to secure sufficient support from CSPs. Duquesne Light has recruited CSPs on a competitive basis by sending requests for proposals to a significant pool of potential contractors. Prior to selecting contractors and signing agreements, Duquesne Light will confirm the ability of the CSPs to fulfill their responsibilities while adhering to the Commission approved CSP contract. RFPs are sent to the CSPs currently listed on the Commission registry as well as interested parties and this process will continue for newly approved programs.

A broader issue could be the long-term availability of qualified technicians and professionals with skills such as energy auditing, energy savings analysis, project engineering and measures installation. Duquesne Light continues to cooperate with educational institutions and training organizations to increase the supply of qualified personnel in the Pittsburgh job market. One unique strategy with long-run potential is to stimulate interest in the field for energy efficiency via programs targeted to achieve energy savings in educational facilities and in the homes of students and staff at those facilities.

4.1.4. Describe "early warning systems" that will be utilized to indicate progress towards the goals and whether they are likely to be met. Describe EDC's approach and process for shifting goals and funds, as needed, between programs and adding new measures/programs.

As in prior Phases, progress toward goals will be reported on a regular basis rather than waiting until the end of the program cycle. The progress reporting process has been developed by Duquesne Light in consultation with regulatory authorities. Furthermore, CSPs are directly involved through regular reporting, documentation of issues, and development of plans to resolve issues in meeting goals.

Duquesne Light implements programs in a manner to facilitate adjustments of individual programs funds and goals in order to achieve corporate goals. Each program is managed with a total budget as well as a budget for each year of implementation. This approach allows for at least an annual review and decision on the budget for the subsequent year. Key performance indices will be created collaboratively between Duquesne Light and its selected CSP for tracking to occur no less than annually.

As further protection to help ensure funds are well managed, Duquesne Light pays for CSP performance in two steps. For applications submitted and approved by Duquesne Light, Thirty percent (30%) of the of the performance payment shall be a Project Commitment Progress Payment (PCPP) payable 30 days after a Project has progressed in PMRS system to "Pending Customer Acceptance". The remaining up to seventy percent (70%) of the performance-based budget payment shall be a Project Installation Progress Payment (PIPP) payable 30 days after Duquesne Light's review and approval of Project documentation and project has progressed in PMRS system to "Project Complete."

These plans provide flexibility to Duquesne Light to re-allocate program budgets. For example, some programs may be oversubscribed so that more funds could be added to meet customer demand for participation and shifted away from programs that are undersubscribed.

New programs may be added over time to reach underserved customers and market segments. In particular, CSPs with expertise and experience in certain market segments may be recruited to address specific opportunities.

Similarly, new technologies may be encouraged as programs are implemented. Duquesne Light is open to offering incentives for new technologies, whether as an existing program, new program or sub-program.

Finally, Duquesne Light expects to file as required with regulatory authorities when considering significant adjustments to programs or adding new programs and new technologies.

4.1.5. Provide implementation schedules with milestones. Describe the status of CSP solicitations and transition plans for programs or sections that change CSPs from Phase IV to Phase V.

RFPs have been sent for all except one and contracts are being negotiated. See Section 12, Charts 1 through 4 for implementation schedules and milestones.

4.1.6. Provide a brief overview of how stakeholders will be engaged throughout Phase V. Describe how low-income communities and other marginalized populations will be represented in stakeholder engagement.

During the planning process, individual stakeholder meetings were held to discuss Duquesne Light's program plans for Phase V. Participants included and invitations were extended to regulatory parties such as Office of Consumer Advocate, Office of Small Business Advocate, Duquesne Light's Income Eligible Advisory Group ("IEAG"), lighting vendors, CSPs, EM&V contractor, gas distribution companies, and CAUSE PA.

During Phase V, Duquesne Light plans to hold stakeholder meetings to provide updates as needed and maintain ongoing dialogue with partnerships established during the planning of Phase V programs. For example, Duquesne Light and the gas distribution companies will continue to work together to encourage participation beyond the current Smart Comfort low-income program by holding IEAG meetings in conjunction with other scheduled stakeholder meetings to facilitate efficiency in time and travel. In addition, Duquesne Light agrees that it will seek input from IEAG on marketing materials to income eligible or marginalized populations. Furthermore, DLC will conduct a stakeholder meeting with the Housing Alliance of Pennsylvania, PHFA, other interested affordable housing trade groups, and other interested stakeholders in Phase V to coordinate and tailor the measures targeted in the development of affordable housing opportunities. Additionally, a data sharing partnership is being explored between the PA DEP, Resource Innovations, EDCs and others to streamline data flow and expedite braided incentive processing.

Opportunities for increased coordination with CBO's, other weatherization, energy efficiency, or housing remediation assistance programs will be discussed at IEAG meetings and IEAG recommendations will be considered in good faith.

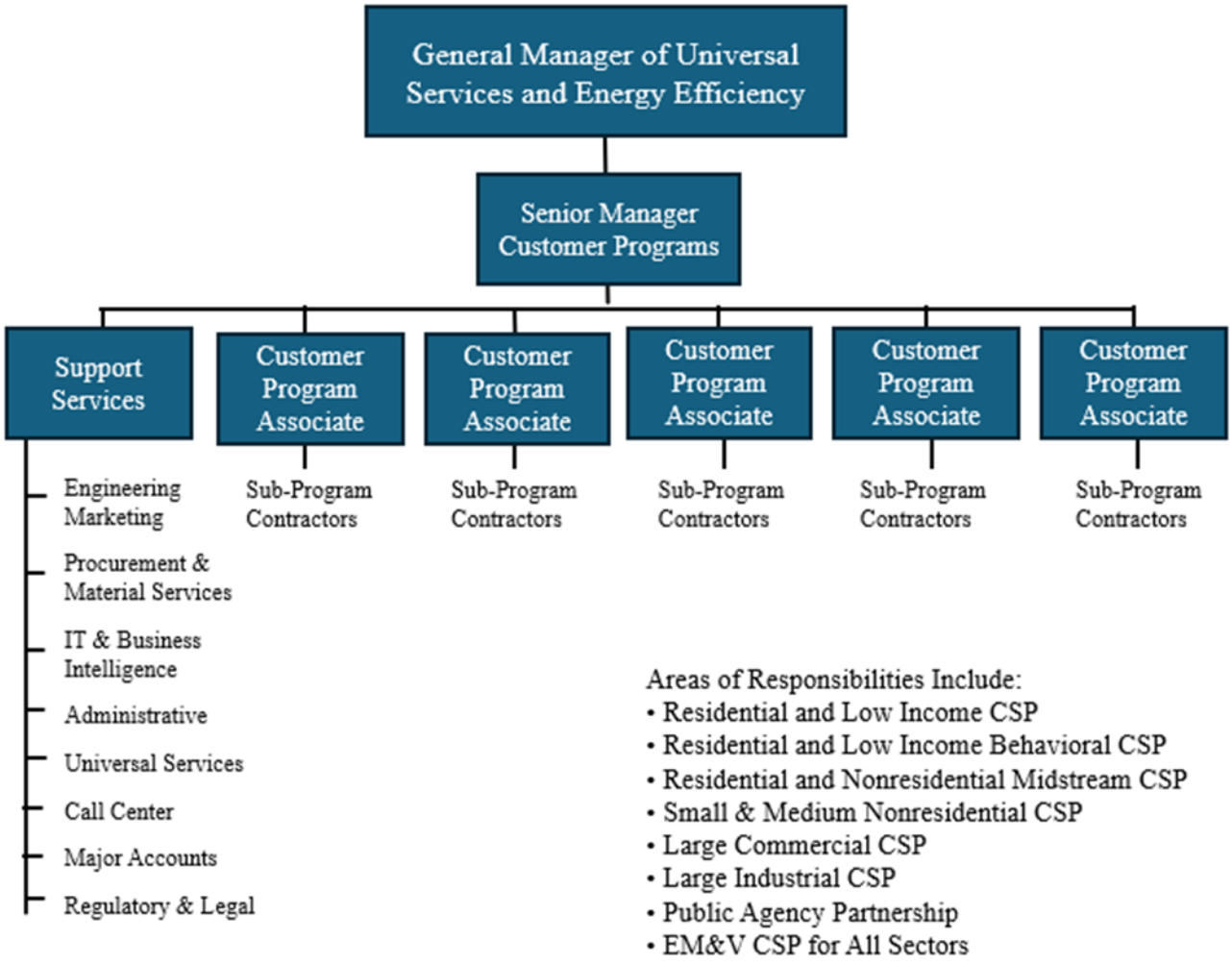
Based upon input from NGDCs, Duquesne Light and its non-residential CSP(s) will hold additional stakeholder meetings after plan approval to discuss the logistics around continued partnership with the NGDCs to increase awareness of rebate opportunities under the Phase V plan.

4.2. Executive management structure:

4.2.1. Describe EDC structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and financial management, program implementation, procurement, program tracking and reporting, and Quality Assurance/Quality Control (QA/QC). Include EDC organization chart for the management team responsible for implementing EE&C plan.

Energy efficiency is implemented under customer programs at Duquesne Light and is housed within the customer service department under the customer experience function. The department's size and function are driven by the portfolio of programs offered. The size and structure also reflect the use of contractors and subcontractors. The organization is headed by one senior manager who reports to the General Manger of Universal Services and Energy Efficiency. The senior manager is supported by several sector or segment specific customer program associates. There also is support staff for functions to include engineering, marketing, IT and business intelligence, universal services, regulatory, legal, major accounts and contract management. The organizational chart pictured below represents the structure of the organization to implement the energy efficiency and conservation plan.

Figure 6: Customer Programs Organizational Chart



Each customer program associate is responsible for overall program management, including planning, reporting progress on program metrics, internal communication, external communication, budgeting and financial management. The customer program associate will call upon staff support for assistance within the energy efficiency program. Support for the programs is available for procurement and contract management, marketing, and data tracking and reporting. Additionally, quality assurance and quality control functions performed by engineering and other support staff will support the customer program associate.

CSPs are expected to provide a quality control plan. The plan provides quality control on projects, regulatory compliance processes and performance auditing. The plan allows Duquesne Light to access files, data and related program operating information. The plan is designed to minimize customer service issues, protect confidential information and prevent duplicate applications for incentive payments.

4.2.2. Describe approach to overseeing the performance of CSPs and other contractors and how they can be managed to achieve results within budget and ensure customer satisfaction.

Contractors and implementers of programs are subject to detailed planning requirements. The detailed plans include tasks, milestones, schedules, budgets, metrics of performance and personnel assignments. Regular reports on progress are required with sufficient information to allow the identification of issues and planning for improvements. Each contractor is subject to specific policies and procedures to guide their activities. Hard copy and/or electronic documentation methods may be required as appropriate. Regarding customer satisfaction, contractors and implementers are expected to foster and participate in obtaining feedback from their clients; results will be provided to Duquesne Light, whether directly or through a third party.

4.2.3. Describe basis for administrative budgets and the proposed approach to accounting for EDC staff time who manage the EE&C plan.

The EE&C Plan budget may be defined broadly into two components: (1) incentive costs and (2) all other costs excluding incentives, termed administration costs or "Admin." Admin may be broken into two parts, Program Admin and Portfolio Admin.

Program Admin: Program Admin includes those direct costs to program implementation. For programs implemented by CSPs, Program Admin is paid under the terms of discrete implementation contracts that may include minimal start-up costs and other fees but are primarily paid based on performance $/annualized kWh savings. Program Admin performance payments are derived based on historical implementation costs and market-based responses to competitive solicitations.

Portfolio Admin: Portfolio Admin is comprised of cost to implement the EE&C Plan, generally referred to as a "Portfolio" of programs. These costs are for cost elements that do not vary by program but are common to all programs. Portfolio Admin costs include EDC labor, overarching marketing costs; tracking system, data management and communication costs; program measurement costs, quality assurance, and other implementation services such as the cost to respond to requests by the Commission and its SWE. The basis for these costs was initially benchmarked to programs in other states, now based on historical activity within the Commonwealth. Portfolio Admin is estimated at 10% of the EE&C Plan budget.

4.3. Conservation Service Providers (CSPs):

4.3.1. Provide detailed justifications for why the EDC did or did not choose to use a CSP to perform specific EE&C plan functions. Identify whether the EDC or its CSP(s) will use Community Based Organizations (CBOs) to deliver its Act 129 programs and describe the expected roles(s) for CBOs within the broader CSP strategy.

Duquesne Light issued six RFPs for Phase V servicing residential, non-residential customers, behavioral programs and EM&V. CSP registration on the PA PUC Act 129 CSP Registry is

required to contract services in excess of 10% of the Plan budget, and as such, is a requirement in these solicitations. Therefore, all directly contracted implementers evaluators or service providers whose compensation exceeds 10% the Phase V EE&C Plan budget will be registered CSPs. Duquesne Light examined in detail the programmatic functional tasks required and the best fit for CBO partners to be involved in program implementation. LIEEP will engage a range of CBOs to enroll and engage customers. Additionally, LIEEP will work with faith-based partners across the service territory to reach customers through trusted channels.

4.3.2. List any selected CSPs, describe their qualifications and basis for selection (include contracts in Appendix). If the EDC plans to forego the competitive bidding process for any CSP, describe the rationale. Confirm that the contract value of CSP contracts that are not bid competitively is less than 1% of the total plan budget (2025 IO at 226).

Duquesne Light issued an RFP for Phase V EM&V servicing residential, commercial and industrial customers. CSPs were asked to participate in a pre-bid meeting signifying their interest and were required to respond to the formal RFP. A team evaluated the responses, and selection was made based upon the firm possessing substantial qualifications in energy efficiency as it related to the particular segment under review. The selected bidder, Guidehouse, scored highest on comprehensive and achievable work plan. They are a leader in the EM&V field and have worked previously with Duquesne Light and one other EDC in the Commonwealth. The Company's contract with this CSP is being filed contemporaneously with this Plan. Contracts for the CSPs described in Section 4.3.1. will be filed at the Commission for approval. These contracts include all the work, measures, and detailed requirements for each of the program segments for which they were selected. One such CSP agreement is included as Section 13, CSP Agreement.

4.3.3. Describe all pending CSP solicitations for which the EDC plans to retain CSP services but has not selected the winning bidder.

It is anticipated that CSPs may be sought for the following segments:

- Residential programs
- Behavioral program
- Low-income programs
- Comprehensive residential and nonresidential programs
- Commercial sector programs
- Industrial sector programs
- Implementation services

4.4. Coordination with Other State Conservation Programs:

4.4.1. Describe how the EDC plans to collaborate with gas and water utility and other state or federal programs to achieve savings, detailing coordinated program management, tracking and reporting of outside funds, and implementation strategies. EDCs may claim the full gross verified savings for any EE&C project they support if they also incentivize or directly install eligible electric measures (2025 IO at 186-187).

Program marketing materials and implementation approach ensures customers are aware of other complementary incentive opportunities (e.g., IRA funds). Implementation CSP's proprietary software configured to show more opportunities for residents and address funding gaps within the home assessment report providing immediate visibility and unlocking rebate braiding or stacking.

Implementation CSPs have contract statements of work requiring, where outside monetary resources are available to participating customers, such as the federal Inflation Reduction Act Home Electrification and Appliance Rebates (formerly HEEHRA / HEAR) or Whole-House Energy Efficiency Rebates (formerly HOMES / HER), CSP will assist customer and/or Duquesne Light to complete the necessary forms for submission to the PA Department of Environmental Protection and other agency programs. Duquesne Light's tracking and reporting system is able to track external funding.

Additionally, Duquesne acknowledges the requirement for an ASHRAE Level 2 audit in order to qualify for these IRA-funded incentives. Noting the Commission's order that the EDCs only claim savings for installed measures that they incentivized or directly installed, Duquesne will evaluate contributing to the cost of these audits on a case-by-case basis. When evaluating whether, and to what extent, to offset the cost of the audit, Duquesne will take into consideration both the magnitude of savings, and likelihood of completion, of the specific project measures for which the Company could claim credit.

4.4.2. Discuss how the EDC will highlight the availability of multiple funding sources and provide prospective Act 129 participants information where they can learn more about external funding opportunities (2025 IO at 190).

As described above, implementation CSPs have the systems, processes and contract requirements to inform customers of available external funding. Duquesne Light's PMRS tracking and reporting system has data fields to track and report the occurrence of such "braided" incentives.

4.4.3. Propose a process to facilitate Alternative Energy Portfolio Standards (AEPS) registration for C&I participants of Act 129 programs to register their energy-efficiency projects and take advantage of the elevated AEC pricing. EDCs can design this support in a way that aligns with the needs of its customers and treat the cost of AEPS registration support as a recoverable administrative cost (2025 IO at 182-184).

Act 129 energy efficiency measures may qualify for Tier I and/or Tier II Alternative Energy Credits under AEPS Act 213. Duquesne Light, and its program implementing CSPs, will provide program participants with information about AEPS credits, at the time

of program enrollment and incentive application processing. Customers will be encouraged to registration their Act 129 project with the AEPS Program to earn AEPS credits. Program customer-facing media will refer program participants to the PENNAEPS Portal.

4.4.4. Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Identify whether any programs will provide health and safety measures or services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.

Duquesne Light closely coordinates its Act 129 Low-Income Energy Efficiency Program (LIEEP) and its Universal Services Low-Income Usage Reduction Program (LIURP) Smart Comfort. Where LIEEP falls short of implementing health and safety measures, per se, Smart Comfort can and does install such measures. Duquesne Light uses a common contractor for LIEEP and LIURP, the visits and assessments are implemented by the same crews and coordinated with regional natural gas distribution utilities. In this way Duquesne Light ensures no customer lacks consideration and attention to health and safety measures.

4.4.5. Discuss strategies to collect information about dual participation to facilitate accurate reporting on braided funding opportunities and calculation of the "leverage ratio" by program. The Phase V Implementation Order defines the leverage ratio as the amount of known external funding for Phase V EE&C projects relative to the incentives issued by the Act 129 program (2025 IO at 159).

As described above in Section 4.4.1., Act 129 programs are implemented by contactors with techniques and tools to inform customers about external funding and they have contracts requiring them to do so. As stated above in both Sections 4.4.1 and 4.4.2, the PMRS tracking system is capable of tracking such outside incentives. If these outside incentives manifest, Duquesne Light will track them, calculate the ratio of outside-to-inside program incentives, and report the result as a "leverage ratio."

5. Reporting and Tracking Systems[34]

(Objective of this section is to provide detailed description of reporting and the critical data management and tracking systems that EDCs need in order to implement programs and which Commission, and its statewide EE&C Plan Evaluator, need to access.)

5.1. Indicate that the EDC will provide semiannual and annual reports as prescribed in the June 18, 2025 Implementation Order.

Duquesne Light's Program Management and Reporting System (PMRS) provides information reported to the Commission's appointed Act 129 EE&C Statewide Evaluator (SWE). Program activity reports are provided in form and format specified by the SWE pursuant to SWE semiannual, annual and numerous ad hoc data requests. Examples are provided below.

Figure 7: Data Elements for Residential Program Tracking Data

Data Point	Required Field Name	Format	Notes
Operating Company	EDC	Text	Name of EDC
Program Year	YEAR	Numeric	Program Year that savings will be claimed
Program Quarter	QUARTER	Numeric	Quarter that savings will be claimed
Project Number	PROJECTNUM	Text	Unique identifier for the program participant. A count of the distinct values of this field will generally equal the EDC reported participant count for the quarter
Measure Number	MEASURENUM	Text	Unique identifier for the record in database
Program Name	PROGRAM	Text	Name of program in EE&C plan that savings accrue to
Sub-Program Name	SUBPROGRAM	Text	Initiative within program that savings belong to
Sector Name	CUSTSEGMENT	Text	Residential or Residential Low-Income
Service Zip Code	SERVICEZIP	Numeric	Postal code of service address

[34] This Section may be modified if the Commission's statewide EE&C Plan Evaluator develops further reporting and tracking systems that are approved by the Commission.

Data Point	Required Field Name	Format	Notes
Premise Type	PREMISETYPE	Text	SF-Attached, SF-Detached, MF, Manufactured, etc.
Measure Category	MEASURECATEGORY	Text	General category measure belongs to (End-use, technology etc.)
Measure Name	MEASURENAME	Text	Specific name of measure
Measure Lifetime	MEASURELIFE	Text	EUL of measure
TRM Measure	TRMMEASURE	Boolean	Equal to 1 if savings are calculated using a TRM protocol, zero otherwise
TRM Measure Number	TRMMEASURENUM	Text	Protocol in the 2026 PA TRM. Null for non-TRM measures
Quantity	QTY	Numeric	Number of units installed or rebated
Quantity Units	QTYUNIT	Text	Description of the unit of measurement or the QTY field (lamps, tons, square feet, etc.)
Installation Date	INSTALLDATE	MM/DD/YYYY	When the measure was installed and operable
Recorded Date	RECORDDATE	MM/DD/YYYY	Date the savings were recorded in the system of record
Rebate Paid Date	REBATEDATE	MM/DD/YYYY	When the rebate check was issued to the participant
Reported Energy Savings	REPORTEDKWH	Numeric	Total reported energy savings for the measure (equal to per-unit savings multiplied by # units)
Reported Demand Savings	REPORTEDKW	Numeric	Total reported peak demand savings for measure
Rebate Amount	REBATEAMOUNT	Numeric	Total incentive payment associated with measure

Figure 8: Data Elements for Upstream Lighting Program Tracking Data

Data Point	Required Field Name	Format	Notes
Operating Company	EDC	Text	Name of EDC
Program Year	YEAR	Numeric	Program Year that savings will be claimed
Program Quarter	QUARTER	Numeric	Quarter that savings will be claimed
Measure Number	MEASURENUM	Text	Unique identifier for the record in database
Program Name	PROGRAM	Text	Name of program in EE&C plan that savings accrue to
Sub-Program Name	SUBPROGRAM	Text	Initiative within program that savings belong to
Manufacturer	MANUFACTURER	Text	Name of measure manufacturer
Distributor	DISTRIBUTOR	Text	Distributor name, address, telephone, email
Measure Lifetime	MEASURELIFE	Text	EUL of measure
Measure Name	MEASURENAME	Text	Specific name of measure (usually qualitative description such as “13W A-line CFL” or “10W BR30 Dimmable”)
Measure Shape	MEASURESHAPE	Text	Bulb shape (e.g., spiral, A-line, flood/reflector, candelabra, etc.)
Measure Type	MEASURETYPE	Text	Technology (i.e., CFL, LED, etc.)
Measure Wattage	MEASUREWATTS	Numeric	Bulb / fixture wattage
Measure Lumens	MEASURELUMENS	Numeric	Bulb lumen range
Measure Features	MEASUREFEATURE	Text	Other specialty features (e.g., color, non-medium screw base, Wi-Fi-enabled, etc.)
Model Number	MODELNUM	Alphanumeric	Model number
SKU Number	SKUNUM	Alphanumeric	SKU number

Data Point	Required Field Name	Format	Notes
TRM Measure	TRMMEASURE	Boolean	Equal to 1 if savings are calculated using a TRM protocol, zero otherwise
TRM Measure Number	TRMMEASURENUM	Text	Protocol in the 2026 PA TRM Null for non-TRM measures
Quantity	QTY	Numeric	Total number of units of products sold
Quantity Units	QTYUNIT	Text	Description of the unit of measurement for the QTY field (e.g., packs, bulbs, watts, etc.)
Pack size	PACKSIZE	Numeric	Number of bulbs in pack
Recorded Date	RECORDDATE	MM/DD/YYYY	Date the savings were recorded in the system of record
Invoice Number	INVOICENUM	Numeric	Invoice number under which the product was charged to the EDC or implementation contractor
Invoice Submission Date	INVOICEDATE	MM/DD/YYYY	Date invoice submitted by partner
Rebate Paid Date	REBATEDATE	MM/DD/YYYY	When the rebate check was issued to the partner
Energy Savings Unit Basis	EESAVINGSUNITS	Text	Basis for energy savings, e.g., per bulb
Reported Energy Savings	REPORTEDKWH	Numeric	Total reported energy savings for the measure (equal to per-unit savings multiplied by # units)
Demand Savings Unit Basis	DRSAVINGSUNITS	Text	Basis for demand savings, e.g., per bulb
Reported Demand Savings	REPORTEDKW	Numeric	Total reported peak demand savings for measure
Retail Price	RETAILPRICE	Numeric	Original retail price or MSRP of product
Rebate Amount	REBATEAMOUNT	Numeric	Total incentive payment associated with measure

Data Point	Required Field Name	Format	Notes
Rebate Unit Basis	REBATEUNIT	Text	Basis for rebate, e.g., per bulb, per pack, etc.
Rebated Price	REBATEDPRICE	Numeric	Rebated price of product
Retailer Location	RETAILLOC	Text	Retailer location (address of store, not of headquarters)

Figure 9: Data Elements for Non-Residential Program Tracking Data

Data Point	Required Field Name	Format	Notes
Operating Company	EDC	Text	Name of EDC
Program Year	YEAR	Numeric	Program Year that savings will be claimed
Program Quarter	QUARTER	Numeric	Quarter that savings will be claimed
Project Number	PROJECTNUM	Text	Unique identifier for the program participant. A count of the distinct values of this field will generally equal the EDC reported participant count for the quarter
Measure Number	MEASURENUM	Text	Unique identifier for the record in database
Program Name	PROGRAM	Text	Name of program in EE&C plan that savings accrue to
Sub-Program Name	SUBPROGRAM	Text	Initiative within program that savings belong to
Sector Name	CUSTSEGMENT	Text	Small C&I, Large C&I, or GNI
Service Zip Code	SERVICEZIP	Numeric	Postal code of service address
Premise Type	PREMISETYPE	Text	Descriptor of type of business. Mapped to the HOU or EFLH tables where applicable.
Measure Category	MEASURECATEGORY	Text	General category measure belongs to (end-use, technology, etc.)

Data Point	Required Field Name	Format	Notes
Measure Name	MEASURENAME	Text	Specific name of measure
Measure Lifetime	MEASURELIFE	Text	EUL of measure
TRM Measure	TRMMEASURE	Boolean	Equal to 1 if savings are calculated using a TRM protocol, zero otherwise
TRM Measure Number	TRMMEASURENUM	Text	Protocol in the 2026 PA TRM. Null for non-TRM measures
Quantity	QTY	Numeric	Number of units installed or rebated
Quantity Units	QTYUNIT	Text	Description of the unit of measurement for the QTY field (lamps, tons, square feet, etc.)
Installation Date	INSTALLDATE	MM/DD/YYYY	When the measure was installed and commercially operable
Recorded Date	RECORDDATE	MM/DD/YYYY	Date the savings were recorded in the system of record
Rebate Paid Date	REBATEDATE	MM/DD/YYYY	When the rebate check was issued to the participant
Reported Energy Savings	REPORTEDKWH	Numeric	Total reported energy savings for the measure (equal to per-unit savings multiplied by # units)
Reported Demand Savings	REPORTEDKW	Numeric	Total reported peak demand savings for measure
Rebate Amount	REBATEAMOUNT	Numeric	Total incentive payment associated with measure

5.2. Program Tracking Systems:

5.2.1. Provide a brief overview of the data tracking system for managing and reporting measure, project, program and portfolio activities, status, and performance, as well as EDC and CSP performance and expenditures.

Duquesne Light has designed, developed, and updated a PMRS for tracking, managing and reporting measure, project, program and portfolio activities. The PMRS v2.0 is a cloud-based modern tracking and reporting system introduced and operated in Phase IV and will continue with modifications in Phase V. The PMRS supports and facilitates program operation,

management and reporting for use by program managers and sub-segment program managers. PMRS serves three primary purposes:

1) Enable CSPs and internal management to create and/or upload program activities
2) Provide the capability to review and approve activities
3) Provide comprehensive reporting to support Duquesne Light's internal and Commission reporting requirements, described above.

5.2.2. Describe the software format, data exchange format, and database structure the EDC will use for tracking participant and savings data. Provide examples of data fields captured.

PMRS is a system using a web front-end which stores data in the back end via a relational MS SQL Server database engine. Duquesne Light customer information is captured via web service calls to Duquesne Light's customer care and billing system. Once a customer's data is captured in PMRS the data is managed within that system. The database is populated by entering data by webform or by uploading the measures and financial flat files from SSPMs/CSPs. The system accepts measure and financial files in "flat file" format, such as comma separated values ("CSV") files, or in structured formats like JSON. The PMRS reads and extracts the data from these files and stores the values in the PMRS database. There are currently more than 350 unique data elements within the database; this number has increased over time in order to capture additional customer-, measure-, and project-level attributes to meet program delivery needs, SWE reporting requests and functional changes needed for Phase V. PMRS uses a custom reporting engine to produce reports from the database. Reports and supporting data for Commission review and audit are provided in hard copy as well as published for download through SharePoint and/or the system's reporting interface. In preparation for Phase V, Duquesne Light is updating its current PMRS to incorporate additional, API-based mechanism of data import and export.

5.2.3. Describe how CSPs will integrate with the tracking system and the procedures to ensure the upload and exchange of data from CSPs to the EDCs is sound.

CSPs will use a mixture of webforms, flat-file uploads, and web APIs to integrate with PMRS for the purposes of program activity reporting. In addition to fully automated validation of input variables (both in terms of scope and content of variables), there are several explicit approval actions that occur during the project development and review process. After loading data, CSPs review the individual measures and the project summary before submitting the project for approval. Duquesne Light program managers then review the project, approving both the measures and the overall project while comparing the data with supporting documentation. The combination of input data validation and several rounds of review ensure that Duquesne's tracking system data is sound.

The reporting capabilities of the PMRS also support robust review and analysis of program activity data. Data elements tracked in PMRS address customer data, customer contact data, project and measure data; as well as financial rebate, CSP performance payment data, and measure/project (TRC) cost effectiveness screening. The following are illustrative

screenshots of activity viewed from inside PMRS and SharePoint and are provided as an example of online project access:

Figure 10: PMRS Screenshot - Project List View

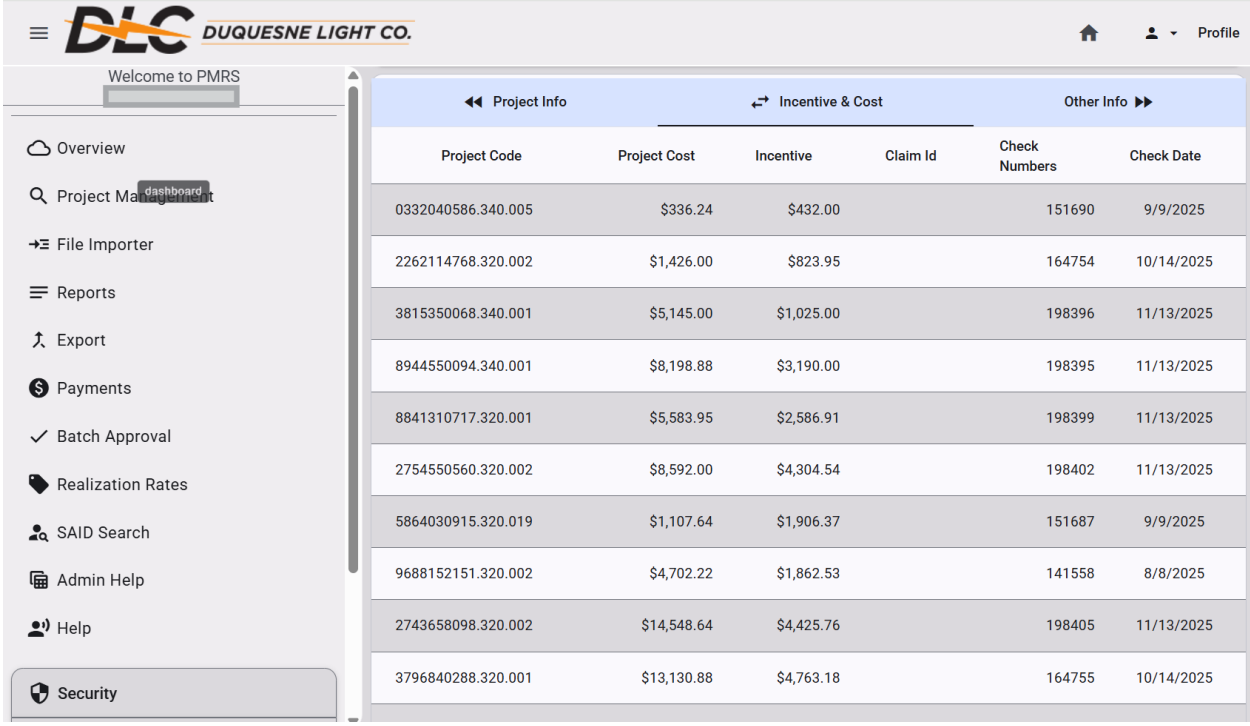


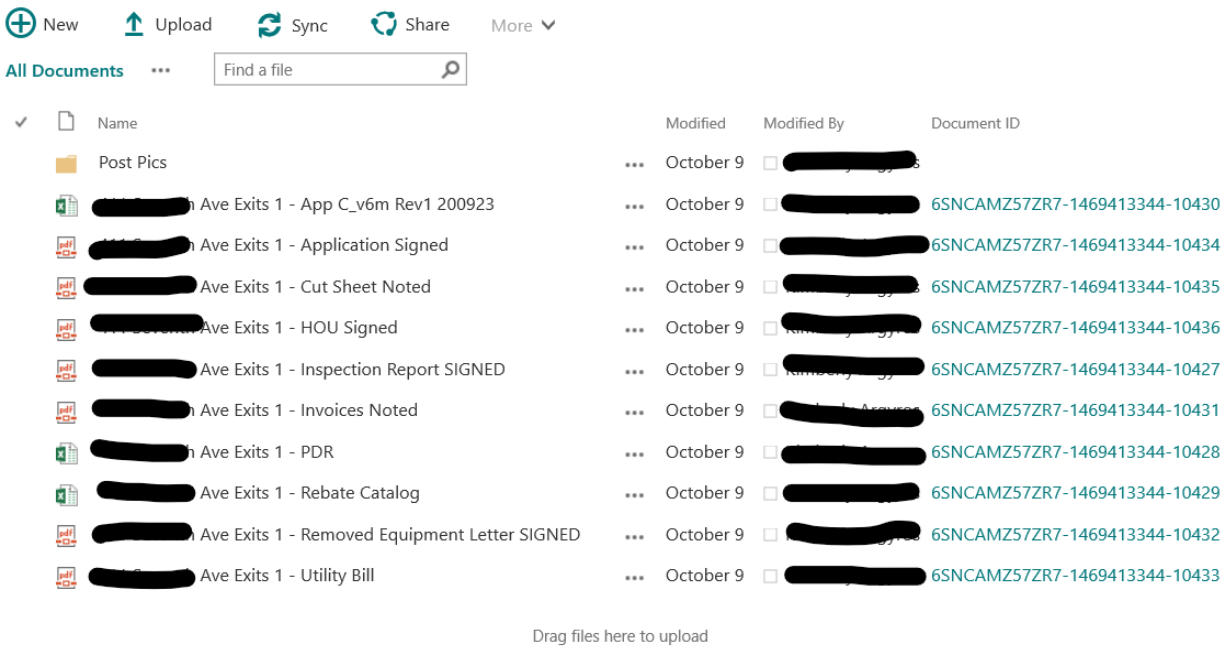
Figure 11: PMRS Screenshot – Program Summary Report

		Pending Projects						Completed Projects							
Program ID	Program Name	Projects	Measure Qty	(Project) Cost $	Customer Incentives $	Ex-Ante kWh Savings	Ex-Ante kW Reduction	Projects	Measure Qty	(Project) Cost $	Customer Incentives $	Ex-Ante kWh Savings	Ex-Ante kW Reduction	Ex-Post kWh Savings	Ex-Post kW Reduction
100	Appliance Recycling	2	106	$524	$300	4,049	0.6	7,767	8,856	$431,250	$430,860	5,753,736	1,321.9	6,066,705	1,405.5
101	Midstream Incentives	0	---	---	---	---	---	3	13	$1,750	$1,750	6,915	2.9	6,915	2.9
102	Upstream Incentives	0	---	---	---	---	---	40	320,533	$2,777,411	$1,248,651	6,755,535	897.0	7,424,269	1,281.9
120	Downstream Incentives	33	376	$270,541	$5,030	8,278	0.5	59,733	159,730	$16,828,087	$2,545,865	22,850,518	3,562.7	22,875,212	3,162.0
140	Residential Behavioral Energy Efficiency	0	---	---	---	---	---	7	7	$0	$0	28,147,797	5,133.3	27,635,028	4,387.7
200	Low Income Energy Efficiency	3	15	$33,877	$0	69,935	0.9	25,416	231,070	$6,383,020	$60,532	11,169,825	991.0	10,673,114	956.5
201	Small Multifamily Housing Retrofit Program	0	---	---	---	---	---	33	6,175	$3,130,448	$422,141	2,338,803	409.2	2,344,541	491.3
202	Upstream Incentives, Cross-Sector Sales	0	---	---	---	---	---	18	22,823	$110,106	$30,018	524,253	150.0	553,853	163.1
220	Large Multifamily Housing Retrofit Program	0	---	---	---	---	---	1	1,310	$115,175	$55,284	175,364	22.8	221,432	27.4
240	Low Income Behavioral Efficiency	0	---	---	---	---	---	5	5	$0	$0	2,538,348	248.3	2,852,383	383.7
300	Small Business Direct Install	0	---	---	---	---	---	420	42,191	$5,583,349	$4,446,859	8,999,464	1,366.5	8,208,787	1,367.1
301	Small Business Solutions	0	---	---	---	---	---	728	97,884	$7,678,072	$2,183,805	27,819,577	5,513.7	29,296,188	6,491.1
302	Small Business Midstream Solutions	0	---	---	---	---	---	3,313	154,144	$11,192,959	$8,214,826	52,652,882	10,565.4	57,302,847	11,868.0
303	Small Business Virtual Commissioning	0	---	---	---	---	---	50	50	$0	$513,765	2,919,120	492.7	2,863,166	535.9
320	Commercial Large Business Solutions	1	102	$9,815	$4,003	39,818	6.4	232	155,800	$27,137,907	$5,276,303	64,289,174	12,109.2	64,386,479	12,315.7
321	Commercial Large Business Midstream Solutions	0	---	---	---	---	---	2,151	168,016	$7,315,762	$2,660,804	24,434,796	4,455.7	33,366,706	6,233.6
322	Commercial Large Business Virtual Commissioning	0	---	---	---	---	---	13	13	$0	$743,429	4,224,027	433.4	4,109,518	582.9
340	Industrial Large Business Solutions	0	---	---	---	---	---	47	6,827	$5,446,259	$1,812,721	29,362,707	3,006.1	29,779,081	3,026.4
341	Industrial Large Business Midstream Solutions	0	---	---	---	---	---	400	17,272	$3,617,947	$2,018,320	16,799,996	3,740.1	20,728,584	3,801.1
Grand Total		**39**	**599**	**$314,758**	**$9,333**	**122,081**	**8.4**	**100,377**	**1,392,720**	**$97,749,503**	**$32,665,932**	**311,762,838**	**54,421.6**	**330,694,809**	**58,483.8**

Report Filters

Period Q1 / Y13 (Jun/01/2021 - Aug/31/2021) - 11/19/2025

Figure 12: SharePoint Screenshot – Project Support Files



5.2.4. Indicate that the EDC will fulfill all quarterly and annual data requests issued by the Commission and its SWE. Describe the level of access and mechanism for access for Commission and its SWE.

Duquesne Light will fulfill all quarterly and annual data requests issued by the Commission and its statewide evaluator. Measure-level project data will be available on-demand through the PMRS reporting interface. Additional project supporting documentation will be supplied on request through a secure file exchange mechanism (SharePoint). The reporting system can provide specialized reports if requested by SWE or the Commission's Bureau of Technical Utility Services ("TUS") once the phase begins. Access to SharePoint and PMRS can be provided to TUS and SWE as requested.

5.2.5. Describe the cybersecurity procedures the EDC will use to protect the personally identifiable information of program participants.

Duquesne Light takes cybersecurity, and the security of its customers' information, very seriously. Data files containing customer information are encrypted both in transit and at rest when exchanged with the Company's CSPs. Access to Duquesne Light's tracking system requires two-factor authentication (passkey or authenticator app), is protected by Microsoft Defender for Cloud, and excludes system access from users outside of the United States. Additionally, the system supports role-based access ensuring that users only have access to customer and project information that is relevant to their role within the EE&C program.

The web interface for the Company's tracking system is secured using industry standard SSL encryption. Duquesne Light's tracking system utilizes column-level encryption to protect personally identifiable information.

6. Quality Assurance and Evaluation, Measurement and Verification

(Objective of this section is to provide detailed description of how the EDC's quality assurance/quality control, verification and internal evaluation process will be conducted and how this will integrate with the statewide evaluation activities)

6.1. Describe overall approach to quality assurance and quality control.

EE&C program QA/QC is incorporated into program planning and implementation as described below:

Program Planning: Program target markets and measure content are based on an energy efficiency potential forecast that is a systematic and comprehensive inventory of regional efficiency gain opportunities. Program approaches to deliver identified energy efficiency services are developed using benchmarked program approaches and best practices, tailored to Duquesne Light regional needs and opportunities.

Program Implementation: All CSPs under contract to implement Duquesne Light energy efficiency programs are required by contract statements of work to provide a Program Management Plan ("PMP"). The PMP presents the program rationale, assumptions, approach, processes, and other key material in an integrated form. Duquesne Light staff will monitor the PMP as well as the KPI to hold the CSPs accountable for delivery.

The PMP addresses the following key sections:

- Program overview and assumptions.
- Program policies and procedures.
- Production plan.
- Marketing plan.
- Technical specifications.
- Performance metrics and reporting.
- Quality assurance plan.
- Data management plan.
- Invoice and measure reporting tools.
- Appendices:
    - Program forms.
    - Marketing materials.
    - Subcontractor contracts.

6.2. Describe procedures for measure and project installation verification, quality assurance and control, and savings documentation.

Procedures for Project Review, Approval and Processing

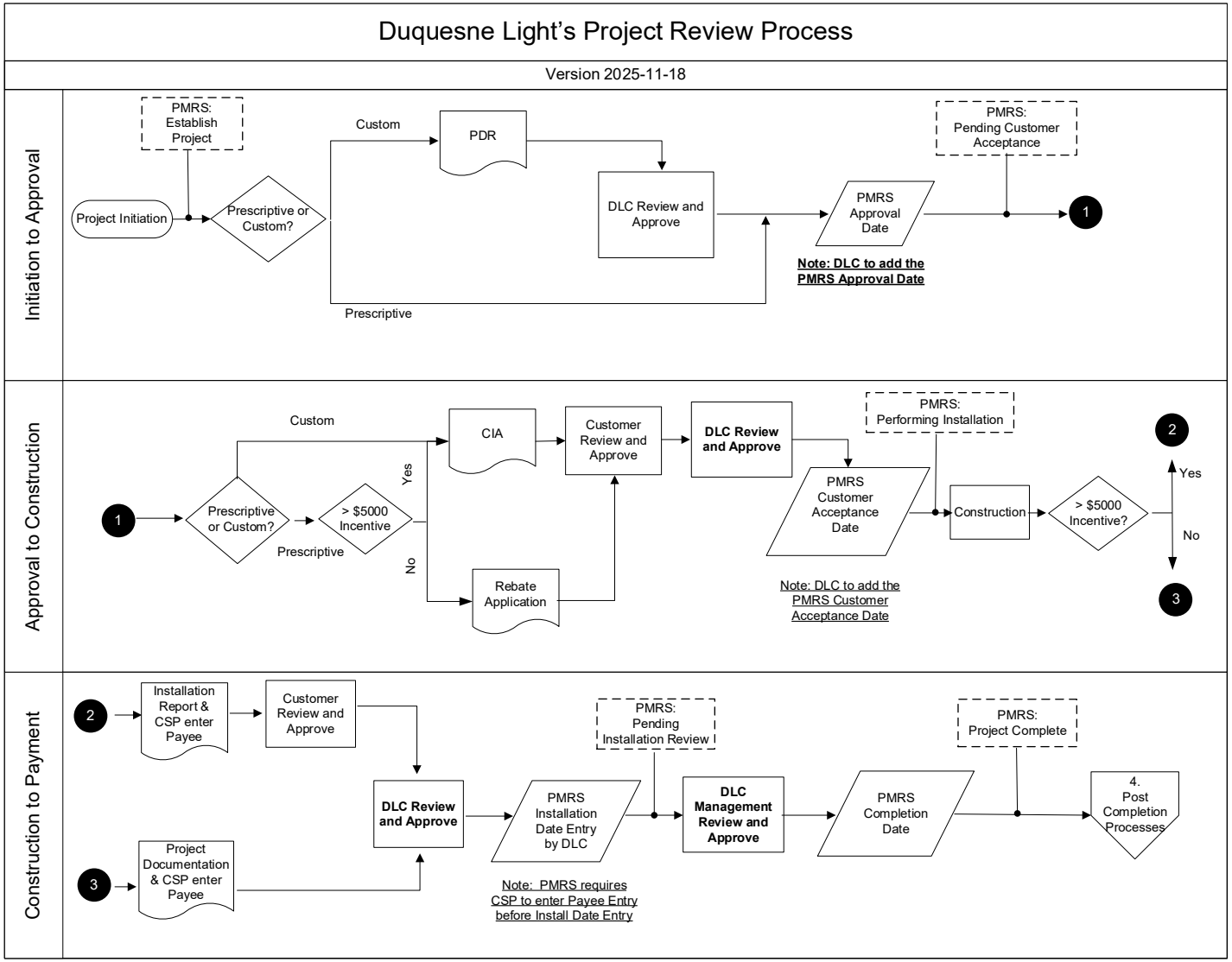
Procedures are in place to ensure prospective projects receive appropriate and consistent review prior to approval and incentive payment processing.

Residential incentive application processing is accomplished by a fulfillment contractor or a contracted CSP. This is comprised of verification to ensure the customer is a Duquesne Light customer, the product information is correct, the product is eligible under the program to receive incentives, and that invoices corroborate product identification and are dated within the eligible program period.

Commercial and industrial (C&I) project and customer incentive processing varies depending upon the type and size of the project. Project development, review and approval processes are shown below in the project review flow chart built upon the following three project phases:

- Initiation to Approval: Projects are established in PMRS. If the prospective project is a custom measure project, a Project Description Report (PDR) is required. If the project is approved for advancing, Duquesne Light approves the project in PMRS, and the project is advanced to the participating customer for acceptance.
- Approval to Construction: Depending upon project type (prescriptive or custom) and amount of the incentive payment a Customer Incentive Agreement (CIA) or Rebate Application is required. A CIA or Rebate Application is presented to the customer for approval. Duquesne Light or contracted CSP reviews and confirms customer acceptance and enters the Customer Acceptance Date into PMRS. The project is advanced in PMRS to "Performing Installation."
- Construction to Payment: If the incentive amount is greater than $5,000, an installation report, customer review and approval is required; otherwise, project documentation is advanced to Duquesne Light and payee information is populated in PMRS. Duquesne Light reviews for approval submitted Installation Reports and other project documentation. Pending successful management review, the completion date is entered into PMRS and the customer incentive payment is prepared.

Figure 13: Project Review Process



Duquesne Light reviews project file content for completeness and accuracy. If the project is composed of prescriptive measures, savings calculations are verified to be consistent with current TRM requirements. If the project is comprised of custom measures, the project file is reviewed to ensure a measurement and verification plan has been developed and adhered to and that the project file contains all applicable engineering reports, savings measurements, and cost documentation. The following is a working document used for reviewing project file content:

Figure 14: Project File Review List

PROJECT FILE REVIEW LIST

Program Name: **Project No:**

One of the following are required from each section below (varies by implementer and project scope):

Customer Enrollment

- Rebate Application ☐
- Customer Incentive Agreement ☐
- Customer Signed Project Package ☐
- Memorandum of Understanding ☐

Project Definition

- Project Description ☐
- Electric bills/Audit Report/Studies ☐
- Equipment Inventory (baseline) ☐
- Equipment Inventory (retrofit) ☐
- Savings calculations (Appendix C or Appendix D) ☐
- Cost Estimates ☐
- TRC Screening ☐

Installation Report

- Site inspection documentation (reports/pictures) ☐
- Cost documentation (invoices/purchase orders/supplier quotations) ☐
- Specification sheets ☐
- Other (Vendor provided installation verification) ☐

Measurement & Verification

- PA TRM Algorithms & Inputs ☐
- Pre- and Post-measurement ☐
- Calibrated Simulation ☐
- HOU (Measure Specific) ☐

Memorandum & Correspondence ☐

Notes:

Evaluation Measurement and Verification: Projects and measure reported savings are verified pursuant to the Duquesne Light Evaluation Measurement and Verification (EM&V) Plan. The EM&V Plan ensures customer projects are verified according to a consistent and systematic process that is consistent with the Statewide Evaluator's (SWE) Audit Plan and Evaluator's Framework for Pennsylvania Act 129 Energy Efficiency and Conservation Programs (Audit Plan). The Duquesne Light EM&V Plan specifies sample plans as well as applicable verification rigor consistent with the Audit Plan and is vetted with, and approved by the SWE.

6.3. Describe process for collecting and addressing participating customer, contractor and trade ally feedback (e.g., suggestions and complaints).

All CSPs under contract to implement Duquesne Light energy efficiency programs are required by contract statements of work to perform customer feedback surveys. The CSP contracts will be submitted to and approved by the Commission. For contractor implemented programs, customers are provided Duquesne Light direct contact information along with an open solicitation for feedback and comments.

Depending upon program target markets, would-be providers of program implementation are evaluated, in-part, based on their ability to engage and leverage trade associations and contractor networks to promote energy efficient technologies and practices. Active and direct engagement of customers, contractors and trade associations has and will continue to characterize Duquesne Light's EE&C program planning and implementation.

6.4. Describe any planned market and process evaluations and how results will be used to improve programs.

Process evaluation methods, research objectives, timing and frequency, quality control and evaluation components are provided under Section 3 of Duquesne Light's Phase IV SWE approved EM&V Plan. The Phase V EM&V Plan is not available at this time, but Duquesne Light anticipates similar treatment and structure as seen in prior phases. The primary research issues center around assessing program design and operation. Specific researchable issues are briefly listed below:

- Document and review program operations (e.g. Program Management Plans) to provide baseline description of program operations and management to compare design and operational practices with the program theory.
- Design and utilize interview and survey techniques to describe and assess program operations, which can be compared to original design intent, and to measure participant satisfaction and program performance, which can be analyzed to identify gaps between program goals and results.
- Identify and recommend changes in a program's operational procedures or systems that can be expected to improve the program's efficiency or cost-effectiveness.

Process evaluation content is incorporated into impact evaluation research activities; therefore, it is conducted in the same frequency and timing as impact evaluation activities. The results of

process evaluations are communicated with program planning and implementation team members on a semiannual basis.

6.5. Describe strategy for coordinating with the EM&V contractor and the SWE.

As in prior Phases, Duquesne Light will continue periodic SWE conference calls, participation in scheduled Program Evaluation Group meetings, response to data requests and providing SWE pre-defined semiannual and annual program reporting. In addition, biweekly calls with the EM&V contractor occur for coordination.

6.6. Describe the approach to incorporating changes to codes and standards, which may occur during Phase V of Act 129. (TRM Order at 12-14).

Duquesne Light will incorporate changes to codes and standards in accordance with the process described in the TRM Order at 12-14. In preparation for any required changes to baselines or savings methodologies, Duquesne Light will modify its incentive eligibility requirements and/or update its PMRS tracking system to properly calculate measure impacts.

7. Cost Recovery Mechanism

(Objective of this section is to provide detailed description and estimated values for cost recovery mechanism.)

7.1. Provide the total allowable EE&C costs based on 2% of 2006 revenue. Confirm alignment with the EDC budget limit specified in the 2025 IO Section A.2.

Figure 15: Total Allowable EE&C Costs

	2006 Total	2% of Total
DLC Revenue	$723,299,451	$14,465,989
EGS G&T	$253,998,128	$5,079,963
Act 129 Annual Budget		$19,545,952

7.2. Description of plan to fund the EE&C plan in accordance with 66 Pa. C.S. 1307 and 2806.1. Plan costs include both incentives and administrative costs. Administrative costs may include capital expenditures for any equipment and facilities that may be required to implement the EE&C plan, as well as depreciation, operating and maintenance expenses, a return component based on the EDC's weighted cost of capital, and taxes (2025 IO at 231). Demonstrate that all such costs are reasonable and prudent, considering the goals of Act 129.

The Act allows all EDCs to recover on a full and current basis from customers, through a reconcilable adjustment clause under 66 Pa. C.S. § 1307, all reasonable and prudent costs incurred in the provision or management of its plan. The Act also requires that each EDC's plan includes a proposed cost-recovery tariff mechanism, in accordance with 66 Pa. C.S. § 1307 to fund all measures and to ensure full and current recovery of prudent and reasonable costs, including administrative costs, as approved by the Commission. To that end, Duquesne Light has designed a surcharge and reconciliation mechanism for all customer segments. The surcharge has been designed in a manner that recovers costs of the programs from the customers who have an opportunity to participate in and receive the benefits of those programs.

7.3. Provide data tables (see Tables 10, 11, 12, 13 and 14).

See Section 11 for tables.

7.4. Provide and describe tariffs and a Section 1307 cost recovery mechanism, pursuant to the requirements of the June 18, 2025 Implementation Order at 231, that will be specific to Phase V Program costs. Provide all calculations and supporting cost documentation.

The tariff sets forth the monthly surcharge rates by customer class to recover the program budgets. Since the proposed cost recovery method is different for residential, small/medium C&I and large C&I customer classes, a formula and description of the formula is defined for each customer class surcharge. Four surcharges are defined to recover costs as reasonably close as

possible for each customer class and segment within the class, i.e. commercial or industrial customers. The formulas are in accordance with the provisions of Section 1307 cost recovery surcharge and include reconciliation of over or under collections. Duquesne will not impose any interest on over or under collections, per the Commission's Phase V Implementation Order at 248.

7.5. Describe how the cost recovery mechanism will ensure that measures approved are financed by the same customer class that will receive the direct energy and conservation benefits.

The Company proposes to implement four surcharges to recover costs as close as reasonably possible to the customer class receiving the benefit. The costs are first defined for the three specific customer classes – residential, commercial and industrial. Commercial and Industrial ("C&I") customers were separated into small and medium C&I and large C&I customer segments because of the diversity in the size of C&I customers in the Company's service territory to allow for more reasonable cost recovery. Small and medium C&I customers are those customers with a monthly max billing demand of less than 300 kW over the prior 12 months. Large C&I customers are those customers with a monthly max billing demand of ≥ 300 kW over the prior 12 months. This segmentation of customers is appropriate because it aligns programs and program costs with the current tariffed rates for distribution service. C&I program costs were then assigned for recovery first based on program description (e.g. Large C&I). Duquesne adopted the use of the Peak Load Contribution demand measure in the application of its cost recovery mechanism for Large C&I customers. The tariff modification for the Phase I Plan was filed with the Commission on November 9, 2009, and was approved by a Secretarial Letter issued on November 24, 2009, at Docket No. M-2009-2093217. The Commission proposed a modification to the Large Commercial Surcharge and the Large Industrial Surcharge in an Opinion and Order dated February 2, 2010, at Docket No. M-2009-2093217. As a result of this modification, Duquesne Light implemented the rate design using a fixed customer charge to recover the administrative costs and a demand charge, using Peak Load Contribution, to recover the incentive costs for Large Commercial and Large Industrial customers. Duquesne filed a revised tariff supplement on February 22, 2010, which became effective April 1, 2010. The fixed customer charge component of the surcharge and the demand charge component of the surcharge are set forth as two separate line-item charges on the customer bill. Duquesne Light used this same surcharge structure in Phases II, III, IV and will continue this same surcharge structure in Phase V.

7.6. Describe how Phase V costs will be accounted for separately from costs incurred in prior phases.

Phase I Plan costs were recovered and reconciled in December 2014 at which time the Phase I surcharge in Rider No. 15 of the tariff was set to zero. Phase II Plan costs were recovered and reconciled through May 31, 2016, when the Phase II Plan ended. The Phase III Plan costs were recovered and reconciled through May 31, 2021, when the Phase III Plan ended. The Company will transition from the Phase IV cost recovery methodology to the Phase V cost recovery methodology in compliance with the Phase V Implementation Order (Order page 248). By April 30, 2026, The Company will submit a 1307e reconciliation of actual Phase IV expenses incurred

with actual Phase IV surcharge revenue received for the 12 months ending March 31, 2026. The net over- or under-recovered amount shall be reflected as a separate line item, without interest, as an e-factor adjustment of the EEC Phase V rates effective June 1, 2026. In addition, as a separate line item, the Phase V rates effective June 1, 2026, shall include projections of the: expenses to finalize any Phase IV measures installed and commercially operable on or before May 31, 2026; expenses to finalize any contracts; and other Phase IV administrative obligations. The reconciliation of actual Phase IV expenses with actual EEC Phase IV surcharge revenue for April and May 2026 shall be reconciled with EEC Phase V revenue and expense for the 12 months ending March 31, 2027. Thereafter, the Company will reconcile actual Phase V expenses incurred with actual Phase V surcharge revenue received for the 12 months ending March 31 of each year for the term of the Phase V Plan.

All costs associated with the Phase V Plan will be identified and tracked in PMRS. On or about May 1 of each year, the Company will file with the Commission its proposed Phase V surcharge rates effective June 1 of that year. The proposed Phase V surcharge rates will be designed to recover the projected program costs for upcoming Plan year and include a provision for the net over- or under- collection for the previous Plan year.

8. Cost Effectiveness

(Objective of this section is to provide detailed description of the cost-effectiveness criteria and analyses. It can refer to appendices with program data.)

8.1. Provide in table format the values contained in the Outputs tab of the Avoided Cost Calculator.[35] Additionally, a completed copy of the Avoided Cost Calculator should be provided with the filing. Discuss any sensitivities or key considerations associated with the forecast of avoided costs.

Avoided Cost Calculator Outputs for market-rate and low-income participants are provided in this section (below) and in Section 14: Avoided Cost Calculator.

See Figure 16 and Attachment A. There are no sensitivities or key considerations to discuss.

8.2. Confirm use of a 3% real discount rate and a 5% nominal discount rate TRC Test Order at 15).[36]

Avoided costs are calculated by applying a 5.0% discount rate and 2.0% annual inflation rate rendering a real-discount rate rounded to 3%. See Avoided Cost Calculator, General Inputs tab provided in Section 14.

8.3. Explain and demonstrate how the proposed plan will be cost-effective as defined by the TRC Test specified by the Commission (TRC Test Order at 17).[37]

Avoided electric energy and capacity costs are used for the purposes of determining the Phase V EE&C Plan cost-effectiveness and are developed in compliance with the Commission's 2026 TRC Order.[38] Duquesne Light developed the data inputs to support the avoided costs analysis and implemented the inputs in the Avoided Cost Calculator (ACC) as prescribed by the order and provided by the SWE. The following methodology was used to calculate energy and capacity price inputs to determine avoided costs:

Energy Prices: Forecast energy prices are provided for 20 years, in three multi-year periods consistent with the applicable TRC orders. Energy prices for each of the calendar years 2026-2029 were calculated using futures prices quoted by the New York Mercantile Exchange ("NYMEX") on the last trading day of the prompt month 3 months prior to the EE&C plan filing date. Prices for Real Time LMP Western Hub Futures contracts on September 22, 2025 are utilized in the ACC tool.[39] There are no traded futures contracts for the Duquesne Light Locational Marginal Pricing (LMP) zone, so costs are based on PJM Western Hub futures prices

[35] Available at http://www.puc.state.pa.us/filing_resources/issues_laws_regulations/act_129_information/total_resource_cost_test.aspx
[36] *See 2026 Total Resource Cost (TRC) Test Order*, at Docket No. M-2024-3048998, entered November 7, 2024.
[37] *Id*
[38] *See id.*
[39] CME NYMEX Data https://www.cmegroup.com/trading/energy/electricity/pjm-western-hub-peak-calendar-month-real-time-lmp_quotes_settlements_futures.html

with an adjustment to the DLC zone based on the PJM state of the market report for 2024/2025 for annual cost differences between Western Hub and the DLC zone. Prices are separated into Summer and Winter months and an average was calculated for the planning year (July – June, futures contract periods).

For calendar years 2026-2037, natural gas futures prices were used by applying the heat rates provided in the ACC for on peak of 11,030 BTU/kWh and for off peak of 7,596 BTU/kWh[40] to the applicable the natural gas price. Gas prices are a blend of prices quoted from Henry Hub futures prices from CME Group based on the last trading date of the prompt month 3 months prior to the EE&C filing date and natural gas prices published in the EIA 2025 AEO. The blended price phases in the EIA prices over a 7-year period with greater weight applied to the EIA price each year. Basis differentials were added to the gas price based on the average Tetco-M3 basis swap to Henry Hub futures as provide by the Intercontinental Exchange[41]. Prices are separated into Summer and Winter months and an average was calculated for the planning year (July – June, futures contract periods).

Energy prices for calendar years 2036-2045 utilized EIA's Annual Energy Outlook 2025 forecast price for generation for the MAAC region.[42]

Capacity Prices: Capacity (generation) prices are based on the PJM Reliability Pricing Model (RPM) Base Residual Auction results for the Duquesne Light Zone for planning periods from an average of the 2024/2025, 2025/2026 and 2026/2027 adjusted net zonal load price. The last planning period result was escalated through 2045 using the inflation rate of 2% as provided in the tool.[43]

[40] Phase V Avoided Cost Calculator, General Inputs tab.
[41] TETCO M-3 basis data available at https://www.theice.com/marketdata.
[42] Source: EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars: B.2.b.iii Page 16.
[43] Ibid.

Figure 16: Duquesne Light Act 129 EE&C Plan Phase V Avoided Costs

For Non-Low-Income Program Activity

		DLC Zone Summer ($/MWh)		DLC Zone Winter ($/MWh)		DLC DLC Zone Shoulder ($/MWh)		DLC Generation Capacity ($/kW/year)		DLC Transmission Capacity ($/kW/year)		DLC Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2026	$88.30	$59.27	$91.75	$80.40	$74.35	$63.24	$72.59	$72.59	$61.07	$0.00	$59.28	$0.21	$3.92	Segment 1
19	2027	$98.32	$68.77	$106.29	$94.75	$85.26	$73.51	$46.05	$46.05	$62.54	$0.00	$64.43	$0.12	$4.01	
20	2028	$106.23	$76.51	$115.43	$103.05	$92.17	$80.32	$46.97	$46.97	$64.06	$0.00	$69.93	$0.18	$3.88	
21	2029	$105.44	$76.48	$115.23	$102.83	$91.14	$79.49	$48.05	$48.05	$65.61	$0.00	$76.21	$0.18	$3.79	
22	2030	$71.85	$43.16	$80.10	$69.01	$58.32	$47.58	$35.61	$35.61	$67.20	$0.00	$81.30	$0.29	$3.63	Segment 2
23	2031	$71.72	$43.12	$78.58	$68.02	$57.49	$47.06	$36.47	$36.47	$68.83	$0.00	$83.27	$0.29	$3.55	
24	2032	$71.96	$43.33	$80.84	$69.62	$58.06	$47.50	$37.36	$37.36	$70.49	$0.00	$85.29	$0.30	$3.62	
25	2033	$74.47	$45.12	$84.82	$72.41	$60.50	$49.23	$38.26	$38.26	$72.20	$0.00	$87.35	$0.31	$3.86	
26	2034	$77.20	$47.04	$89.23	$75.50	$63.33	$51.23	$39.19	$39.19	$73.95	$0.00	$89.47	$0.32	$4.14	
27	2035	$79.69	$48.81	$93.06	$78.18	$65.96	$53.09	$40.14	$40.14	$75.74	$0.00	$91.63	$0.32	$4.38	
28	2036	$81.77	$50.29	$96.25	$80.43	$68.03	$54.57	$41.11	$41.11	$77.57	$0.00	$93.85	$0.33	$4.58	Segment 3
29	2037	$81.71	$50.30	$95.87	$80.22	$67.96	$54.56	$42.10	$42.10	$79.45	$0.00	$96.13	$0.34	$4.55	
30	2038	$81.12	$49.95	$94.21	$79.13	$67.29	$54.16	$43.12	$43.12	$81.37	$0.00	$98.45	$0.35	$4.46	
31	2039	$80.72	$49.73	$93.00	$78.35	$66.84	$53.90	$44.17	$44.17	$83.34	$0.00	$100.84	$0.36	$4.38	
32	2040	$81.14	$50.07	$93.77	$78.94	$67.28	$54.27	$45.24	$45.24	$85.36	$0.00	$103.28	$0.36	$4.41	
33	2041	$82.44	$51.02	$96.64	$80.97	$68.69	$55.29	$46.33	$46.33	$87.43	$0.00	$105.78	$0.37	$4.55	
34	2042	$83.87	$52.07	$99.83	$83.22	$70.24	$56.41	$47.45	$47.45	$89.55	$0.00	$108.34	$0.38	$4.71	
35	2043	$85.35	$53.14	$103.11	$85.54	$71.83	$57.57	$48.60	$48.60	$91.71	$0.00	$110.96	$0.39	$4.87	
36	2044	$86.35	$53.90	$105.26	$87.08	$72.92	$58.38	$49.78	$49.78	$93.94	$0.00	$113.65	$0.40	$4.97	
37	2045	$87.13	$54.49	$106.85	$88.24	$73.75	$59.01	$50.99	$50.99	$96.21	$0.00	$116.40	$0.41	$5.05	

Figure 17: Duquesne Light Act 129 EE&C Plan Phase V Avoided Costs

Low-Income Sector Program Activity

		DLC Zone Summer ($/MWh)		DLC Zone Winter ($/MWh)		DLC DLC Zone Shoulder ($/MWh)		DLC Generation Capacity ($/kW/year)		DLC Transmission Capacity ($/kW/year)		DLC Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2026	$106.97	$77.94	$110.42	$99.07	$93.02	$81.91	$72.59	$72.59	$61.07	$0.00	$59.28	$0.21	$3.92	Segment 1
19	2027	$117.36	$87.81	$125.33	$113.80	$104.31	$92.55	$46.05	$46.05	$62.54	$0.00	$64.43	$0.12	$4.01	
20	2028	$125.65	$95.94	$134.86	$122.47	$111.60	$99.74	$46.97	$46.97	$64.06	$0.00	$69.93	$0.18	$3.88	
21	2029	$125.26	$96.29	$135.05	$122.64	$110.96	$99.30	$48.05	$48.05	$65.61	$0.00	$76.21	$0.18	$3.79	
22	2030	$92.06	$63.37	$100.31	$89.22	$78.53	$67.79	$35.61	$35.61	$67.20	$0.00	$81.30	$0.29	$3.63	Segment 2
23	2031	$92.33	$63.74	$99.19	$88.63	$78.10	$67.67	$36.47	$36.47	$68.83	$0.00	$83.27	$0.29	$3.55	
24	2032	$92.98	$64.36	$101.87	$90.65	$79.09	$68.53	$37.36	$37.36	$70.49	$0.00	$85.29	$0.30	$3.62	
25	2033	$95.92	$66.56	$106.27	$93.86	$81.94	$70.67	$38.26	$38.26	$72.20	$0.00	$87.35	$0.31	$3.86	
26	2034	$99.08	$68.92	$111.11	$97.37	$85.21	$73.10	$39.19	$39.19	$73.95	$0.00	$89.47	$0.32	$4.14	
27	2035	$102.00	$71.12	$115.37	$100.49	$88.28	$75.40	$40.14	$40.14	$75.74	$0.00	$91.63	$0.32	$4.38	
28	2036	$104.53	$73.05	$119.01	$103.19	$90.79	$77.33	$41.11	$41.11	$77.57	$0.00	$93.85	$0.33	$4.58	Segment 3
29	2037	$104.93	$73.52	$119.09	$103.44	$91.17	$77.78	$42.10	$42.10	$79.45	$0.00	$96.13	$0.34	$4.55	
30	2038	$104.80	$73.63	$117.89	$102.81	$90.97	$77.84	$43.12	$43.12	$81.37	$0.00	$98.45	$0.35	$4.46	
31	2039	$104.87	$73.88	$117.15	$102.50	$90.99	$78.05	$44.17	$44.17	$83.34	$0.00	$100.84	$0.36	$4.38	
32	2040	$105.78	$74.71	$118.40	$103.57	$91.92	$78.90	$45.24	$45.24	$85.36	$0.00	$103.28	$0.36	$4.41	
33	2041	$107.57	$76.15	$121.77	$106.10	$93.82	$80.42	$46.33	$46.33	$87.43	$0.00	$105.78	$0.37	$4.55	
34	2042	$109.50	$77.70	$125.46	$108.85	$95.87	$82.04	$47.45	$47.45	$89.55	$0.00	$108.34	$0.38	$4.71	
35	2043	$111.49	$79.28	$129.25	$111.68	$97.97	$83.71	$48.60	$48.60	$91.71	$0.00	$110.96	$0.39	$4.87	
36	2044	$113.02	$80.56	$131.93	$113.75	$99.58	$85.04	$49.78	$49.78	$93.94	$0.00	$113.65	$0.40	$4.97	
37	2045	$114.33	$81.69	$134.05	$115.44	$100.95	$86.21	$50.99	$50.99	$96.21	$0.00	$116.40	$0.41	$5.05	

Avoided costs are applied at the measure level and are based upon individual measure estimated useful life (EUL) and energy savings time-of-use and seasonal profiles. Measure EULs are taken from the 2026 TRM. Measure energy savings profiles were taken from the Phase V Avoided Cost Calculator or modeled using annual hourly savings profiles aggregated into time-of-use periods annunciated in 2026 TRM, Volume 1, Tables 1-3 and 1-4.

Assessment of measure, project, program and ultimately portfolio cost-effectiveness requires development of both benefits (described above) and costs. The Total Resource Cost (TRC) test used to determine cost-effectiveness incorporates utility program implementation or administration costs, as well as measure costs. Projected administration costs are provided in Tables 1, 7, 10, 11, 13 and 14. The measure costs included in TRC results are summarized in Tables 8. Consistent with the TRC Order, measure costs are either referenced to the California Database of Energy Efficient Resources (DEER), the SWE incremental cost database, or identified measure cost studies.[44] These costs are reported on an annual basis in compliance with SWE prescribed EDC annual reporting requirements.

8.4. Provide TRC data tables on a gross and net TRC basis. See Section 11 Tables 14 - Gross and Table 14 – Net.

See Section 11 for Table 14 – Gross and Table 14 - Net.

[44] Ibid.

9. Plan Compliance Information and Other Key Issues

(The objective of this section is to have specific areas in EE&C plan where the Commission can review miscellaneous compliance items required in legislation and address key issues in EE&C plan, portfolio, and program design.)

9.1. Plan Compliance Issues.[45]

9.1.1. Describe how the plan provides a variety of energy efficiency and conservation measures and will provide the measures equitably to all classes of customers in accordance with the 2025 IO.

EE&C Plan savings projections for each sector are proportionally aligned with Phase V Potential Study Tables 6, 48, 50 and 52. The forecast values themselves were changed to match the amount in the Commission's Phase V mandate. At the Tables cited above, the Potential Study states Duquesne Light's Act 129 potential as 287,700 MWh and the Commission target is 261,583 MWh.

EE&C Plan forecast measure detail is directly linked to CSP response to competitive solicitations, issued by Duquesne Light, for the design and implementation of the programs presented in this Plan. Accordingly, the measure mix was taken from proposals selected based on CSP expertise and innovation. Phase V Plan measures (see Section 11, Table 8) were reconciled with content of the 2026 Technical Reference Manual (TRM) and information provided in the SWE saturation studies and potential forecast.[46]

In Duquesne Light's EE&C Plan, low-income sector targets represent the largest proportional share of sector savings since initiation of Act 129 EE programs in 2009, up from 5.3% in Phase IV to 7.2% in Phase V. Residential sector programs retain and expand successful online marketplace and midstream rebate offerings. The small-medium nonresidential sector program provides direct-installation, downstream and midstream incentives with program targets and budgets exceeding large commercial, large industrial and GNI sector programs. In Phase V, the PAPP was brought back to better serve the GNI sector. The portfolio as designed pays the greatest attention to serving Duquesne's disparate customer segments.

Program goal allocation and associated program budgets were adjusted to accommodate the Commission's Implementation Order that required segment carve-out for the low-income residential segment. Reporting requirements will be met along with specified program comprehensiveness requirements.[47] Goal allocation for the remaining customer segments was based on segment energy use, previous delivery channel strengths and weaknesses, as well as requirements to achieve mandated reductions at authorized budgets.

[45] These sub-sections may reference other chapters of the plan as they may restate what was included elsewhere in the plan and are collected here only for convenience of review.
[46] Ibid.
[47] Ibid.

9.1.2. Provide a statement delineating the manner in which the EE&C plan will achieve the requirements of the program under 66 Pa. C.S. §§ 2806.1(c) & (d).

The following table shows the projected cumulative portfolio and program reductions in consumption (energy) and peak period demand reduction estimated for the program year ending May 31, 2031:

Figure 18: Projected Portfolio Savings

Program	Savings MWh	Savings MW
Residential Appliance Recycling	6,126	1.145
Residential Online Marketplace	6,500	3.015
Residential Midstream Incentives	20,000	1.086
Residential Low-Income Energy Efficiency	16,932	6.265
Residential Behavioral Energy Efficiency	30,200	7.050
Residential Low-Income Behavioral Efficiency	4,200	0.890
Small-Medium Nonresidential Efficiency	76,000	11.748
Large Commercial Sector Efficiency	50,000	8.504
Large Industrial Sector Efficiency	40,000	5.329
Public Agency Partnership (GNI)	24,704	3.155
Total Portfolio	**274,663**	**48.2**

9.1.3. Provide a statement delineating the manner in which the EE&C plan will achieve the Low-Income requirements prescribed in the June 18, 2025 Implementation Order. Additionally, describe any EDC plans to harmonize Act 129 program delivery with Low-Income Usage Reduction Programs and other external energy efficiency, conservation, and healthy housing programs (such as the Weatherization Assistance Program).

Consistent with Act 129 and the Commission's Implementation Order, Duquesne Light's Phase V EE&C Plan contains two provisions to provide services to households at or below 150% of the federal poverty income guidelines. These provisions are: 1) to obtain a minimum of 7.2% of the total EE&C Plan consumption reduction requirements, and 2) the 7.2% low-income mandate must be achieved by programs that ONLY serve low-income populations. The EE&C Plan is constructed to comply with the Commission's requirements to omit programs capable of serving both income qualifying and non-income qualifying participants.

Duquesne Light plans to continue to utilize the same partner to administer both the Act 129 Low-Income Energy Efficiency Program and Smart Comfort – Low-Income Usage Reduction Program (LIURP). This has proven successful since Phase III. This practice ensures that low-income customers who need and want services are provided with a seamless delivery of services. The Company will also continue to work closely with the local natural gas distribution companies, community-based organizations, state weatherization agencies

and other groups working to serve this group of hard-to-reach customers. The Company will continue to target those customers on the Customer Assistance Program (CAP) with high electric usage. The CAP representative will continue to refer all customers that enroll in CAP to the partner administering the Income Eligible programs offered within both ACT 129 and LIURP. Lastly, the Company will continue to partner with the Income Eligible Advisory Group to gain insight from their expertise. This guidance will help ensure that all customers get the service they need.

The target savings for the Phase based upon the mandated target are shown in Figure 19.

Figure 19: LIEEP Projected Energy Savings

	May 31, 2031
	MWh
Mandated Reductions	261,583
Low Income Requirement	18,933
	7.2%

9.1.4. Describe how the EDC will ensure that no more than 2% of funds available to implement the plan shall be allocated for experimental equipment or devices. Describe any planned pilot programs in Phase V and list the key research questions and metrics that will be used to assess the viability of each pilot program.

Duquesne Light's Phase V EE&C does not contain an emerging technology pilot program. No expenses for experimental equipment anticipated.

9.1.5. Describe how the plan will be competitively neutral to all distribution customers even if they are receiving supply from an EGS.

Duquesne Light is under threat of punitive penalties of up to $20 million for not achieving mandated savings targets. 67 percent of utility energy sales are provided by EGS.[48] Duquesne Light has tremendous and severe cash penalties for not achieving Commission mandates; it will not treat suboptimally customers using two-thirds of its energy throughput as it relates to program participation. Further, since the Act 129 surcharge is a distribution charge paid by all customers, including shopping customers, it is reasonable to assume they are eligible to participate since they pay into the surcharge. Given these facts it is not reasonable to assume Duquesne Light might contemplate treating "shopping" customers differently when compared to bundled service customers.

9.1.6. If the plan includes midstream delivery of non-residential lighting, include a description of how participating distributors will document that the replaced lighting equipment is not LED.

[48] EIA 2023 for 861 form reporting "Bundled" versus "Delivery" energy sales.

The Small-Medium Nonresidential Midstream Program, which includes lighting measures, records project and customer information. Measure installations are verified according to the Phase V evaluation framework that Duquesne Light anticipates will retain field site-verification using random sampling to meet 85% confidence and 15% precision. As a part of program enrollment, participating distributors record project information and Duquesne Light will require enrollment documentation to include baseline lighting sources. EM&V that historically includes verification of baselines, can verify baseline conditions using its interview of site-cognizant personnel and compare the results with program enrollment documentation. The baseline conditions documented by independent EM&V can incorporate into its program realization rates findings where projects were found to replace LEDs with LEDs.

9.2. Other Key Issues:

9.2.1. Describe how this EE&C plan will lead to long-term, sustainable energy efficiency savings in the EDC's service territory and in Pennsylvania.

Previous sections of this plan describe in detail the specific manner in which the program is designed to address specific consumption profiles and respond to diverse customer needs. Since the early 1970s, utility-sponsored energy efficiency programs have developed and refined a series of approaches to effectively reduce energy consumption in the residential, commercial and industrial sectors. Critical elements to program success have been identified, tested, and replicated by utilities nationwide. All of the measures that make up the EE&C plan for Duquesne Light will draw upon the lessons learned in these other initiatives and will focus on reducing kWh and kW usage within each specific customer sector.

Duquesne Light believes that all residential approaches (mass market/rebates, home energy reports and whole home performance/retrofits) are appropriately focused on achieving long-term, sustainable energy efficiency savings. Likewise, programs focused on producing kWh and kW savings in the commercial sector will primarily achieve reductions through rebates and/or other identified funding sources, education, upstream partnerships, and direct installation of measures in customer facilities. Programs serving the industrial sector will focus on producing kWh and kW savings through rebates and/or other identified funding sources through incentives and upstream partnerships. Because the funding levels for each specific measure are evaluated on the level of savings that can be reasonably achieved over the useful life of the measure, the applicable screening methods strongly favor funding measures that provide longer-term savings.

The Plan will facilitate the selection and installation of energy efficient equipment, foster construction of energy efficient structures, and encourage and reward energy efficient behaviors.

Cost-effectiveness determination counts as benefits the present value of life cycle avoided costs. Longer measure lives yield greater life-cycle savings and associated avoided costs. The Cost-effectiveness rules penalize short life "popcorn" measures and reward long-life comprehensive sustainable measure savings. The Plan has a TRC ratio of 2.04:1, effectively demonstrating a Plan comprised of longer term, longer life measures.

9.2.2. Describe, by sector, how the EDC will address consumer education for its programs.

Effective customer education is essential to successfully implementing Duquesne Light's Phase V portfolio of EE&C programs. Comprehensive consumer marketing campaigns will generate both demand for energy efficiency measures and an increased understanding of the benefits of energy efficiency. Duquesne Light will use a wide variety of tools, channels, and techniques to ensure that it reaches its diverse customer base with appropriate customer education.

Residential low-income customers are served by two programs highly focused on customer education. LIEEP puts "feet on premises" to perform home energy assessments and engage in customer "kitchen table" talks to communicate assessment findings and educate customers on strategies to lower their electric bills. The LI-BEEP provides home energy reports, tailored to its low-income treatment groups, with sector-specific outreach and content, educating customers on low-cost, no-cost approaches to save on their electric bills. The Residential OMP informs and engages customers by directing them to energy efficient products and provides incentives to offset the incrementally higher cost of higher efficiency equipment.

Small-medium nonresidential customers receive audits and direct installation of energy efficient equipment. This underserved and under-resourced segment requires door-to-door canvassing to reach and thereby overcome barriers to participation. Midstream incentives cause distributors to stock and discount high efficiency equipment where, and at the time, customers and contractors reach out to purchase. Virtual commissioning studies high intensity energy users and enrolls them in energy action plans to lower energy costs, effectively operating entirely on customer education.

Large Commercial and Industrial customers receive on-site audits including a systematic inventory of energy savings options with cash offers to offset the cost to implement recommended measures. Large Industrial customers receive strategic energy management services where parties meet, discuss energy use, and develop an action plan to increase efficiency where measurement is based on the "whole building" impacts of equipment and operational improvements. PAPP GNI participants, execute memoranda of understanding, to create energy action plans, and commit jurisdictional agencies to study and improve their operational efficiencies and lower energy costs.

All of these activities are central to their respective program's implementation and can be characterized as customer education.

9.2.3. Describe how the EDC will provide the public with information about the results from the programs.

Since the inception of the Phase I Act 129 Plan, Duquesne Light has posted all plans and reports to the Customer Programs Energy Efficiency website where any interested party can also see the results from the programs. Participation data will include (but not be limited to) information concerning the level of customer participation, the calculated energy savings,

description of the associated environmental benefits and other significant program milestones and information.

10. Appendices

A. Approved CSP contract(s).
B. Calculation methods and assumptions. Describe methods used for estimating all program costs, including administrative, marketing, and incentives costs; include key assumptions. Describe assumptions and present all calculations, data and results in a consistent format.

Appendix A: CSP Services Agreement

CSP SERVICES AGREEMENT

This CSP Services Agreement, dated _____2025 is made by and between Duquesne Light Company ("DLC" or "Company") and _____. ("CSP").

WHEREAS, CSP is in the business of providing information and technical assistance on measures to enable a person to increase energy efficiency or reduce energy consumption services in the utility industry; and

WHEREAS, DLC is an electric distribution company ("EDC") in Pennsylvania; and

WHEREAS, Act 129 of House Bill 2200 ("Act 129") was signed into law by Governor Rendell on October 15, 2008, requiring each EDC to create and submit an energy efficiency and conservation plan by July 1, 2009, and the Pennsylvania Public Utility Commission ("Commission") has developed processes and procedures for the review of EDC filings; and

WHEREAS, the Commission issued an Order at Docket number M-2025-3052826 providing for Phase V energy efficiency and conservation plans from June 1, 2026 through May 31, 2031; and

WHEREAS, CSP will provide services regarding the implementation of DLC's EE/Conservation Plan as required by Act 129 and the Commission's Orders; and

WHEREAS, CSP certifies that it was approved by and is a member of the Commission's Registry of Conservation Service Providers and will maintain such registration with the Commission for the term of this Agreement; and

WHEREAS, DLC is relying upon the skill and expertise of CSP to implement the Plan and to meet the needs of DLC and to provide the services necessary for the proper and effective energy efficiency and conservation plan compliance.

NOW, THEREFORE, in consideration of the premises and of the mutual benefits and covenants contained herein, the parties hereto, intending to be legally bound hereby, agree as follows:

1. DEFINITIONS

"Applicable Law" means any applicable constitution, charter, act, statute, law, ordinance, code, rule regulation, judgment, decree, writ, order, permit, approval or the like of any Governmental Authority.

"Company" shall mean Duquesne Light Company.

"**Company's Site**" shall mean 411 Seventh Avenue, Pittsburgh, PA 15219.

"**Price**" shall mean the purchase price or prices stated in Exhibit D of the CSP Agreement.

"PPUC Approval" shall mean a final decision issued by the PPUC approving the Program for the years 2026-2031, consistent with Duquesne Light's application for the Program filed with the PPUC by November 30, 2025 and authorized by the PPUC for implementation by March 31, 2026.

"**CSP Agreement**" shall mean this Agreement, along with Exhibits A, B, C and D.

"**Services**" shall mean CSP services, Work Product and any other work performed by CSP necessary to fulfill CSP's obligations under the CSP Agreement.

"**Subcontractor**" shall mean vendors, suppliers and subcontractors of any tier and any other persons or entities contracting directly or indirectly with CSP for or in regard to the CSP Agreement.

"**Work**" shall mean CSP services. Work Product and other work performed by Contractor as necessary to fulfill CSP's obligations under the CSP Agreement.

"**Work Product**" shall mean studies, reports, evaluations, designs, drawings, procedures, specifications, plans and all other documentation and deliverables which are prepared, produced or acquired by CSP for the Work or at the request or direction of Company in connection with the Plan's requirements for reduction in demand and consumption.

2. CONDITION-PRECEDENT CLAUSE

This CSP Agreement is not effective until PPUC Approval is issued. Within three (3) Business Days following PPUC Approval, either party may notify the other, in writing, if the PPUC approves the Program with material changes from Duquesne Light's filed program plan that are unacceptable to that party. This Purchase Order is effective five (5) Business Days following PPUC Approval if neither party has informed the other, in writing, of unacceptable PPUC-mandated material Program changes.

3. ENGAGEMENT OF CSP; CSP'S WORK

Subject to the terms and conditions of this CSP Agreement, DLC hereby engages CSP to properly and completely design, submit and assist with the implementation of an energy efficiency and conservation plan in compliance with Act 129 of House Bill 2200. CSP shall perform the Work in a professional and workmanlike manner and with accuracy and reasonable care and skill. Specifically, the Services to be provided are shown on Exhibit A.

4. CSP'S ACKNOWLEDGMENT

CSP, by performing the Work and/or delivering the Work Product, by any performance under this CSP Agreement and/or by written acknowledgement, accepts the offer contained in this Agreement and such acceptance of the offer is expressly limited to the terms and conditions as set forth herein. Any term or condition proposed by CSP, which is different from, conflicts with or adds to any of the provisions of this CSP Agreement, shall be deemed to materially alter the

provisions of this CSP Agreement and is hereby objected to and rejected by DLC. Except as expressly provided herein, under no circumstances shall any term or condition of the CSP's sales documents or otherwise become part of this CSP Agreement.

5. PROJECT SCHEDULE

(a) CSP shall design, submit and assist with the implementation of an energy efficiency and conservation plan to meet all the needs and requirements of DLC, applicable laws and applicable standards, and to allow DLC to properly and efficiently implement a Plan as defined in the Scope and Exhibit A. Company shall be entitled to implement reasonable provisions and procedures for monitoring performance quality and rate of progress. Such is set forth in more detail in Exhibit A.

(b) (i) Except as expressly set forth herein, CSP is authorized to commence the Work and shall perform the Work in accordance with and within the time schedule contained in the project schedule attached hereto as Exhibit B (the "Project Schedule").

(ii) If at any time CSP determines that it is behind schedule or is unable to meet any milestone set forth in the Project Schedule, CSP shall, within five (5) days of its knowledge of such delay, promptly notify DLC, in writing, of any anticipated material departure from the Project Schedule and if CSP has reason to believe that a milestone or the Completion Date will not be met and shall specify in said notice corrective action planned by CSP to timely complete the Work or any portion thereof; provided, however, that such notice shall not relieve CSP of any of its obligations under the CSP Agreement or its obligations to take all actions necessary to achieve the timely and proper completion of the Work. At all times, CSP shall take such actions as may be necessary to facilitate the timely and proper completion of the Work on or prior to any applicable milestones set forth in the Project Schedule or by the Completion Date.

(iii) CSP understands and agrees that time is of the essence with respect to the dates and times set forth in the Project Schedule, including, but not limited to, the Completion Date, and for performance of the Work.

6. PRICE AND PAYMENT

The price or compensation to be paid to CSP is shown in Exhibit D. Compensation shall be performance based, and rewards are provided for achieving successful results and deductions are made for not achieving successful results, as agreed to in Exhibit D.

Unless otherwise agreed upon, statements must be submitted monthly, within 30 days after the end of a billing month. Itemized statements for services and expenses should be submitted directly to Dave Defide, Duquesne Light Company, 411 Seventh Avenue, Mail Drop 15-3, Pittsburgh, PA 15219. If any (portion) of the Work does not conform to the requirements of the CSP Agreement upon inspection by Company, a corresponding portion of the Price may be withheld by Company until the nonconformity is corrected. Invoices shall be paid within 75 days.

7. WARRANTIES

CSP represents warrants and guarantees that the Work provided under the CSP Agreement shall be: (a) provided in accordance with, and conform to, the requirements of the CSP Agreement; (b) provided in accordance with the standard of care consistent with generally accepted industry

practices and procedures in CSP's particular area of expertise; and (c) suitable for the specified purposes.

CSP represents, warrants and guarantees that it is not an affiliate of Duquesne or any other Pennsylvania EDC. If CSP should merge with a Pennsylvania EDC during the term of the CSP Agreement, then the CSP shall immediately notify Duquesne and provide for automatic termination of the CSP Agreement.

CSP represents, warrants and guarantees that it will conduct criminal background checks for all employees of the CSP that will have access to confidential customer information, enter a customer's premises or otherwise have personal contact with an EDC customer.

If, during the sixty-day period following completion of the Work, it is shown there is an error in the Work caused solely by CSP's failure to meet such standards and Company has notified CSP in writing of such error within that period, CSP shall re-perform, at no additional cost to Company, such Work as may be necessary to remedy such error.

Company shall have no liability for defects in the Work attributable to CSP's reliance upon or use of data, design criteria, drawings, specifications or other information furnished by Company.

8. OWNERSHIP RIGHTS

CSP warrants that the Work shall not infringe or misappropriate the intellectual property rights of any third parties. Company shall have exclusive use of and own title, rights and interests in and to all Work. All Work shall be considered "work made for hire."

At all times, each party shall retain all of its rights in its drawings details, designs, specifications, databases, computer software, copyrights, trade and service marks, patents, trade secrets, and any other proprietary property.

9. FACILITIES, SUPPLIES AND EQUIPMENT

To the extent that CSP's Work must be performed at Company's Site, Company shall furnish the facilities, supplies and equipment which Company determines are reasonably required for CSP to perform Work under the CSP Agreement.

10. TERMINATION

Company may terminate all or part of the CSP Agreement if CSP: performs below acceptable standards, abandons the work; becomes bankrupt or insolvent; is unable to obtain a bond, if required; assigns the CSP Agreement or subcontracts any portion thereof without Company's written consent; or otherwise breaches or fails to comply with the CSP Agreement; provided, however, that prior to such termination, Company must have notified CSP in writing of its intent to terminate the CSP Agreement and the reasons therefore, and CSP must have failed to cure such non-compliance within ten (10) days after receipt of such notice. If Company so terminates the CSP Agreement, Company may complete or contract with a third party to complete all or part of the Work, and CSP shall be liable to Company for the excess costs to complete all or such part of the Work and any other damage resulting from CSP's non-compliance or breach. Company may suspend all payments to CSP in order to protect ratepayer funds pursuant to Commission order.

Company may, at any time, also terminate by written notice all or part of the CSP Agreement due to modification of its Energy Efficiency/Conservation plan. Upon receipt of such notice, CSP shall bring the work to a prompt conclusion. Company shall pay CSP a proportionate amount of the price due to CSP for the portion of the Work completed up to the effective date of the termination plus costs necessarily incurred directly as a result of the termination, subject to Company's right to audit CSP's books and records. Such payment by Company, however, shall not exceed the total price for the Work set forth in the CSP Agreement.

In all cases, Company may require CSP to transfer title and deliver to Company any contracts, rights, goods, equipment or Work Product produced, received or acquired by CSP for the performance of the CSP Agreement.

11. INDEMNIFICATION

CSP shall defend, indemnify and hold harmless Company, its directors, officers, employees, agents, successors and assigns and customers and users of the goods, equipment and services, from and against, and shall pay, all losses, damages (including consequential, indirect and punitive), costs, liabilities, suits, claims and actions, and all related expenses (including attorneys' fees and expenses and the actual costs of litigation) by reason of injury or death to any person or damage to any property or any accident or event arising or relating to the performance of the CSP Agreement or arising from or relating to the goods, equipment or services or from any other cause to the extent not attributable to the negligence or willful misconduct of Company.

12. INTELLECTUAL PROPERTY INDEMNIFICATION

CSP represents and warrants that all goods, equipment and services shall not and do not infringe upon any United States or foreign patent, trademark, copyright or other intellectual property right of any third party. CSP shall defend, indemnify and hold harmless Company and its directors, officers, employees, agents, successors and assigns from and against, and shall pay, all losses, damages (including consequential, indirect and punitive), costs, liabilities, suits, claims and actions, and all related expenses (including attorneys' fees and expenses and the actual costs of litigation) based on or arising from an allegation or claim that any goods, equipment or services or parts thereof furnished by CSP infringe or misappropriate the rights of others; and/or if their use by Company is enjoined, CSP shall at Company's option and CSP 's expense either: (a) procure for Company the right to continue using the goods, equipment and services or parts thereof; (b) replace the same with substantially equivalent goods, equipment or services or parts thereof that do not infringe or misappropriate the rights of others; (c) modify the same so they no longer infringe or misappropriate the rights of others; or (iv) refund the price and the transportation and installation costs to Company.

CSP shall obtain from all Subcontractors similar indemnity protection for Company.

13. LIMITATION OF LIABILITY

Company shall not be liable to CSP for any indirect, incidental, special, liquidated, punitive or consequential damages or damages for delay in performance and/or failure to perform, irrespective of whether claims or actions for such damages are based upon contract, tort, negligence, strict liability, warranty or otherwise. CSP's liability for performance shall be limited as set forth in the compensation section except for acts of negligence, misconduct, or intentional acts.

14. CHANGES

Company may, at any time by a written change order, make changes to the scope of the CSP Agreement ("Change Order"). If any change results in an increase or decrease in the quantity or cost of the goods, equipment or services or otherwise materially affects the CSP Agreement, the Change Order will include an equitable adjustment in the price, the schedule and/or any other affected provisions. Any objection by CSP to the equitable adjustment set forth in a Change Order must be asserted within seven (7) business days after receipt of the Change Order by CSP. Notwithstanding such objection, if directed by Company, CSP shall proceed with the change and performance of the Work.

15. SUSPENSION OR INTERRUPTION OF WORK

Company may direct CSP, in writing, to suspend or interrupt all or any part of the Work for such period of time as Company may determine to be appropriate. CSP shall mitigate the costs of such suspension or interruption. Company agrees to reimburse CSP for those expenses necessarily and directly incurred as a result of such suspension or interruption, subject to Company's right to audit CSP's books and records.

16. CONFLICTS, ERRORS AND OMISSIONS

In the event CSP becomes aware of any conflict, error or omission in the documents comprising the CSP Agreement, CSP shall promptly bring the discrepancy to the attention of Company. Such discrepancy shall be resolved by Company in its sole discretion.

17. INSPECTIONS, MONITORING PERFORMANCE QUALITY AND RATE OF PROGRESS

Company may inspect, at all reasonable times, the progress of the Work, including work performed at CSP's or Subcontractor's facilities. Also, if the CSP Agreement, laws, ordinances, rules, regulations or orders of any governmental authority require any portion of the Work to be inspected, tested or approved, CSP shall give Company reasonable notice to permit Company to observe such inspection, testing or approval. CSP shall provide Company with periodic status reports during the course of the Work.

18. COST ACCOUNTS, INFORMATION AND AUDITS

CSP shall maintain detailed separate cost data for each CSP Agreement in accordance with Generally Accepted Accounting Principles. CSP's records pertaining to the cost of the Work (other than fixed prices agreed to prior to performance of the Work) and CSP's tax records shall be open

at all reasonable times for inspection or audit by Company or its representative(s). Company or its representative(s) shall, at all reasonable times, have access to the premises, materials, instructions, working papers, plans, drawings, specifications, memoranda and other information of CSP pertaining to the Work. All CSP's purchase orders or contracts with Subcontractors shall provide that Company or its representative(s) shall have the right to audit Subcontractors' charges to CSP. Company's rights under this Article shall terminate five (5) years after expiration of the warranty periods.

The CSP agrees to make data available to Duquesne Light's Independent EM&V CSP (CSP) and the Pennsylvania Act 129 Statewide Evaluator (SWE) regarding audits and interactions between these parties in regard to program data upon request by the SWE or CSP.

19. INSURANCE

Prior to commencing any portion of the Work, CSP shall properly maintain the following coverage: Statutory Workers' Compensation Insurance in full compliance with the Workers' Compensation and Occupational Disease Acts of each and every state in which Work is to be performed and U.S. Longshoremen's and Harbor Workers' Compensation Acts, if applicable; Employer's Liability Insurance with a limit of not less than $500,000; Comprehensive General Liability Insurance including Premises-Operation Independent Contractor's Protective, Products, Completed Operation, and Blanket Contractual Liability coverages with a combined single limit of not less than $1,000,000 per occurrence and $2,000,000 aggregate; Excess Umbrella Liability Insurance with a single limit of not less than $2,000,000; and Automobile Liability Insurance covering all owned, hired and non-owned vehicles with a combined single limit of not less than $1,000,000 per occurrence. CSP shall provide Company with a certificate of insurance specifically evidencing the coverages required above, naming the Company as an additional insured, except under the Workers' Compensation Policy, and stating the policy numbers and the inception and expiration dates of all policies. The certificate of insurance shall also provide for thirty (30) days' prior written notice to Company in the event of cancellation or any material alteration of any policy. The certificate of insurance shall be furnished to Company prior to commencement of any portion of the Work. The Property Damage Liability Insurance shall include the Broad Form Comprehensive General Liability coverage.

20. TAXES

The price set forth in the CSP Agreement shall include, unless otherwise expressly set forth in the CSP Agreement, all federal state and local sales and use taxes applicable to the manufacture and/or sale of the goods and equipment and/or the performance of the services.

Company will provide to CSP, upon CSP 's request, a tax exemption certificate for taxes for the Work that are exempt under Pennsylvania's Sales and Use Tax laws.

Upon Company's request, CSP shall provide evidence satisfactory to Company of the payment of any taxes which CSP is required to pay. CSP shall also provide to Company such additional information as Company may request to facilitate the determination of taxes for which Company is responsible, if any.

21. CONFIDENTIAL/PROPRIETARY INFORMATION

CSP agrees to treat as confidential and proprietary any of Company and customer's information which is not generally known to the public and to exercise the same care to prevent the disclosure of such information as CSP exercises to prevent disclosure of its own proprietary and confidential information; however, CSP may disclose such information as required by law or court order upon written notice to the Company. Furthermore, Company's information shall be utilized by CSP only in connection with performance of CSP's obligations under the CSP Agreement.

22. PUBLICITY

CSP shall not use Company's name nor issue any publicity releases, including but not limited to, news releases and advertising, relating to the CSP Agreement and Services without the prior written consent of Company.

23. FORCE MAJEURE

Neither party shall be liable for any failure or delay in performing its obligations under the CSP Agreement, or for any loss or damage resulting therefrom, due to causes beyond its reasonable control, including but not limited to, acts of God, public enemy or government, riots, fires, natural catastrophe, strikes or epidemics. In the event of such failure or delay, the date of delivery or performance shall be extended for a period not to exceed the time lost by reason of the failure or delay; provided that Company may terminate the CSP Agreement if the period of failure or delay exceeds fifteen (15) days. Company shall have no obligation to make any payments to CSP during the period of failure or delay. Each party shall notify the other promptly of any failure or delay in, and the effect on, its performance.

24. ASSIGNMENT

CSP shall not assign the CSP Agreement, in whole or in part, nor contract with any Subcontractor for the performance of the same or any of its parts, without first obtaining Company's written consent. Company's consent shall not be construed as discharging or releasing, nor shall it discharge or release, CSP in any way from the performance of the Work or the fulfillment of any obligation under the CSP Agreement.

25. NOTICES

Any notice required under the CSP Agreement shall be in writing and sent to the CSP and Company at their respective addresses identified below:

If to DLC: Dave Defide

Duquesne Light Company

411 Seventh Avenue, Mail Drop 15-3,

Pittsburgh, PA 15219.

Via e-mail: ddefide@duqlight.com

If to CSP:

26. INDEPENDENT CONTRACTOR

CSP shall operate as an independent contractor in the performance of the CSP Agreement and not as an agent or employee of Company. CSP shall ensure that neither it nor its agents or employees shall act or hold themselves out as agents or employees of Company. CSP shall have complete control of its agents and employees engaged in the performance of the Work.

27. PRIORITY OF DOCUMENTS

In the event of conflict among the various documents comprising the CSP Agreement, the conflict shall be resolved according to the priority given to the documents in the Purchase Order. If no priority is indicated in the Purchase Order, the conflict shall be resolved according to Article 16, Conflicts, Errors and Omissions.

28. SEVERABILITY

If any provision(s) of the CSP Agreement is prohibited by law or held to be invalid, illegal or unenforceable, the remaining provisions thereof shall not be affected, and the CSP Agreement shall continue in full force and effect as if such prohibited, illegal or invalid provisions had never constituted a part thereof, with the remaining provisions of the CSP Agreement being enforced to the fullest extent possible.

29. SURVIVAL

The obligations and rights of the parties pursuant to the Warranties, Liens, Indemnification, Intellectual Property Indemnification, Limitation of Liability, Cost Accountants and Information/Audits and Confidential/Proprietary Information shall survive the expiration or early termination of the CSP Agreement.

30. MBE/WBE

It is the policy of Company to stimulate the growth of Certified Minority, Women and Disabled Business Enterprises (MBEs, WBEs and DBEs) by encouraging their participation in Company's procurement activities and by affording them an equal opportunity to compete for Company's procurements. CSP agrees to carry out this policy to the fullest extent consistent with the requirements of the CSP Agreement (a) through the award of subcontracts to MBEs, WBEs and DBEs or (b) if CSP is a MBE, WBE or DBE, through the use of its own forces. CSP shall include this policy as a provision in all subcontracts.

31. LAWS, CODES, RULES, REGULATIONS

CSP and its Subcontractors, at their own expense, shall obtain all necessary licenses and permits and shall comply with all applicable federal, state and local laws, statutes, ordinances, codes, rules and regulations relating to performance of the Work and the CSP Agreement, including but not limited to, safety, products liability, environment, labor standards and workers' compensation laws.

All CSP subcontractors with an annual contract cost that equals or exceeds ten percent of the CSP's total annual contract cost to perform services pursuant to an electric distribution company energy efficiency and conservation plan must also be registered as CSPs. This is pursuant to Implementation of Act 129 of 2008 Phase II – Registry of Conservation Service Providers Order at Docket No. M-2008-2074154 (entered July 16, 2013).

CSP and its Subcontractors shall also comply with Company's policies, rules and procedures.

32. HAZARDOUS AND DANGEROUS GOODS

For any goods or equipment provided by CSP pursuant to the CSP Agreement which are defined as hazardous or dangerous under any applicable law, rule or regulation, CSP shall provide Company with hazardous warning and safety handling information, including Material Safety Data Sheets, and appropriate labeling for all such goods and equipment.

33. ELECTRONIC COMMERCE

At Company's request, Company and CSP may facilitate business transactions for the CSP Agreement by electronically transmitting data. Any data digitally signed pursuant to this Article and electronically transmitted shall be as legally sufficient as a written and signed paper document exchanged between the parties, notwithstanding any legal requirement that the document be in writing or signed.

34. GOVERNING LAW/JURISDICTION

The CSP Agreement shall be governed by and interpreted in accordance with the laws of the Commonwealth of Pennsylvania, excluding the choice of law and conflicts of law provisions. Any litigation arising from or relating to the CSP Agreement shall only be filed in state or federal court in and for Allegheny County, Pennsylvania and CSP hereby consents and submits to the exclusive jurisdiction of such courts.

35. ENTIRE AGREEMENT

The CSP Agreement contains the entire understanding and agreement of Company and CSP with respect to the subject matter hereof and supersedes and replaces all prior agreements and commitments with respect thereto. There are no oral understandings, terms or conditions and neither Company nor CSP has relied upon any representation, express or implied, not contained in the CSP Agreement.

36. AMENDMENT

Except as expressly set forth herein, no provision of the CSP Agreement may be changed, modified, waived, terminated or amended except by written instrument executed as appropriate by Company and/or CSP.

37. WAIVER

Any failure of Company to enforce any of the provisions of the CSP Agreement or to require compliance with any of its terms at any time during the term of the CSP Agreement shall in no way affect the validity of the CSP Agreement, or any part thereof, and shall not be deemed a waiver of the right of Company thereafter to enforce any and each such provision.

38. CAPTIONS

The captions contained in the CSP Agreement are for convenience and reference only and in no way define, describe, extend or limit the scope or intent of the CSP Agreement or the intent of any provision contained therein.

39. RECORD RETENTION

The CSP shall retain all electronic and hard copy project file documentation that it creates pursuant to the CSP agreement for a period not less than five (5) years.

IN WITNESS WHEREOF, the parties have executed this Agreement on the respective dates entered below.

DUQUESNE LIGHT COMPANY	**CSP**
By:_____	By:_____
Name: _____	Name:_____
Title:_____	Title:_____
Date:_____	Date: _____

Appendix B: Calculation Methods and Assumptions.

Calculation methods and assumptions. Describe methods used for estimating all program costs, including administrative, marketing, and incentives costs; include key assumptions. Describe assumptions and present all calculations, data and results in a consistent format.

Administrative Costs: Administrative Costs are provided in detail for each of the 17 program delivery channels at Table 10: Program Budget. Table 10 Non-Incentive costs are disaggregated into the seven types of cost shown in the table below. Duquesne Light Portfolio Admin costs include EM&V and exclude CSP direct-implementation administrative costs. Portfolio admin includes administrative costs that can be tied to specific programs being implemented. Common costs are only those costs applicable to multiple customer sectors or are common across all sectors. Table 10 non-incentive admin cost components have Common Costs embedded in the budget values. Common costs are addressed at Table 11: Allocation of Common Costs. For visibility, the table below summarizes Portfolio and Common Costs.

Phase V EE&C Plan Administrative Costs

Admin Cost Component ($000)	Portfolio	Common	CSP	Total
Program Design	324			$324
Administrative	$3,680	$1,003		$4,683
EDC Delivery Costs	$1,446			$1,446
CSP Delivery Fees			$34,814	$34,814
Marketing	$425	$850		$1,275
EM&V	$2,238			$2,238
Tracking System O&M		$972		$972
Implementation Services	$252	$1,583		$1,835
Total	**8,365**	**$4,407**	**$34,814**	**$47,587**

The Admin Cost components are defined below:

1. Program Design: Technical support to develop and the Phase V EE&C Plan, mid-course corrections and any required refiling.
2. Administrative: Duquesne Light Act 129 dedicated staff labor costs.
3. EDC Delivery Costs: Portfolio-level technical support, tracking system training and support, cost-effectiveness reporting and portfolio Q&A.
4. CSP Delivery Fees: Non-Incentive budget amounts paid to the implementing CSP.
5. Marketing: Portfolio Act 129 Marketing.
6. EM&V: Independent program evaluation and reporting.
7. Implementation Services: Project level support, transition tasks, DLC staff support on complex project engineering review and approvals.

Common Costs (addressed at Table 11) include the following items:

1. Utility staff labor cost to support all programs.
2. Portfolio-wide marketing costs.
3. Portfolio-level Delivery costs (tracking system training and support, technical support, cost-effectiveness reporting and QA/QC).
4. Tracking system hosting and maintenance.

Incentives:

Energy Efficiency programs: Incentive amounts are intended to offset the incrementally higher cost of highly efficient appliances and equipment. The amount paid to participating customers for per unit of measure (lamp, insulation square foot, motor HP, air conditioner ton, etc.) is addressed as a percentage of that incrementally higher cost. The Phase V Implementation Order[49] and TRC Order[50] defines directly-installed equipment costs, as well as the labor cost to install the equipment, as incentives.

In previous Act 129 phases Duquesne Light's program incentives were established using national benchmarking and payback probability acceptance curves.[51] In Phase III Portfolio Incentives amounted to 42% of the Portfolio Budget, on average offsetting 39 percent of projected incremental measures costs. The Phase V Implementation Order require at least 50% of EE&C Plan spending be on incentives. Accordingly, EE&C Plan incentive amounts were increased to 56 percent of the Portfolio Budget offsetting, on average, 41 percent of measure incremental costs. Incremental measure costs are documented, referenced to the SWE incremental costs database,[52] California Public Utilities Commission Database of Energy Efficient Resources (DEER), invoice data from Phase IV program operations, specific measure cost research, and vendor proposals.

Plan Development Methodology: As with the previous four Act 129 Phases, Duquesne Light's Phase V EE&C Plan began at the measure level with forecast projections for more than 300 measures applied to prototypical applications in Duquesne Light specific building stock; measures savings are linked to 2024 TRM algorithms as well as historic custom measure savings impacts. As stated above, incremental measure costs are taken, primarily, from the SWE Incremental Cost Database v5.1 and vendor proposals. Savings were applied to seasonal and time-of-day measure-level savings profiles.[53]

Avoided costs were applied taken from the Phase V SWE Avoided Cost Calculator (ACC) with inputs specific to Duquesne Light, as specific in the Phase V TRC Order and described in the avoided costs section of this Plan. The ACC avoided costs (for generation, capacity and T&D benefits) were expanded to include O&M benefits, as well as water and fossil fuel benefits (or penalties).

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[49] Energy Efficiency and Conservation Program Implementation Order, Docket M-2025-3052826
[50] See Energy Efficiency Potential Study for Pennsylvania, NV5, February 7, 2024.
[51] Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation and Demand Response Plan Docket No. M-2009-2093217, June 30, 2009; Part (3) Energy Efficiency and Demand Side Response Study, MCR Performance Solutions, LLC, June 26, 2009.
[52] SWE Incremental Cost Database version 5.1, October 3rd, 2024.
[53] The Phase V Potential Study

TRC administrative program costs were documented (described above) and combined with measure costs (also described above) to render TRC Cost. The present value of measure level life-cycle avoided costs divided by TRC Costs rendered a TRC Test benefit-cost ratio. The measure mix was optimized, to the extent possible, to achieve projected portfolio performance shown in the following Appendix B.

Appendix B

Residential Programs	Qty	Savings kWh	Savings kW	Lifetime kWh	Portfolio Admin	Direct Program Costs Admin	Direct Program Costs Incentives	Total Program Cost	Total Admin	Measure Cost	TRC Cost	Program Benefits	Demand Reduction Benefits Capacity	Demand Reduction Benefits Trans/Dist	O&M/Fossil/Water	Energy Benefits	TRC
Appliance Recycling	8,014	6,126,000	1,145	41,892,997	$284,875	$1,561,334	$1,019,277	$2,865,486	$1,846,209	$927,894	$1,846,209	$5,399,192	$683,898	$1,574,249	$0	$3,141,045	2.92
Online Marketplace	26,627	6,500,000	3,015	58,583,470	$302,267	$1,910,573	$1,506,378	$3,719,218	$2,212,840	$3,411,392	$5,624,232	$12,457,613	$2,915,965	$5,248,581	$0	$4,293,067	2.21
Midstream Incentives	19,447	20,000,000	1,086	290,831,233	$930,051	$2,449,965	$4,683,569	$8,063,586	$3,380,016	$37,672,606	$41,052,671	$20,535,028	$1,064,426	$1,562,801	$0	$17,907,802	0.50
Low Income Energy Efficiency	219,256	16,932,000	6,265	148,186,439	$787,381	$5,336,196	$9,073,271	$15,196,848	$6,123,577	$3,466,720	$9,590,297	$19,288,148	$3,300,780	$5,393,283	-$260,538	$10,854,623	2.01
Residential Behavioral Energy Efficiency	1	30,200,000	7,050	60,400,000	$1,404,377	$3,604,913	$0	$5,009,290	$5,009,290	$0	$5,009,290	$7,048,565	$745,000	$1,017,357	$0	$5,286,208	1.41
Low Income Behavioral Efficiency	1	4,200,000	890	8,400,000	$195,311	$640,501	$0	$835,812	$835,812	$0	$835,812	$957,650	$94,050	$128,432	$0	$735,168	1.15
Subtotal Residential Programs	**273,346**	**83,958,000**	**19,451**	**608,294,139**	**$3,904,262**	**$15,503,482**	**$16,282,495**	**$35,690,239**	**$19,407,744**	**$45,478,613**	**$63,958,510**	**$65,686,197**	**$8,804,119**	**$14,924,704**	**-$260,538**	**$42,217,913**	1.03
Nonresidential Program		**21,132,000**	**20%**					**$0**	**$0**								
Small-Medium Nonresidential Efficiency	166,825	76,000,431	11,748	1,094,724,290	$3,534,165	$10,009,073	$12,623,280	$26,166,519	$13,543,239	$30,496,186	$39,951,474	$105,021,066	$11,953,217	$29,842,858	-$3,831,218	$67,056,209	2.63
Large Commercial Downstream	79,834	50,000,000	8,504	639,101,805	$2,325,128	$2,992,650	$3,858,721	$9,176,499	$5,317,778	$18,130,695	$23,448,473	$59,941,147	$6,156,760	$15,096,285	-$1,399,192	$40,087,295	2.56
Large Industrial Efficiency	33,515,141	40,000,000	5,329	566,987,094	$1,860,102	$3,650,418	$10,096,380	$15,606,900	$5,510,520	$5,657,944	$11,168,464	$49,145,961	$5,215,326	$10,195,812	-$164,543	$33,899,367	4.40
Public Agency Partnership	39,445	24,704,300	3,155	315,771,254	$1,148,813	$2,658,827	$7,281,963	$11,089,603	$3,807,640	$8,916,754	$12,724,394	$29,346,560	$2,923,732	$7,307,578	-$691,321	$19,806,571	2.31
Subtotal Nonresidential Programs	**33,801,244**	**190,704,731**	**28,736**	**2,616,584,444**	**$8,868,209**	**$19,310,968**	**$33,860,344**	**$62,039,520**	**$28,179,177**	**$63,201,579**	**$87,292,805**	**$243,454,734**	**$26,249,035**	**$62,442,532**	**-$6,086,274**	**$160,849,442**	2.79
Grand Total	**34,074,590**	**274,662,731**	**48,187**	**3,224,878,582**	**$12,772,470**	**$34,814,450**	**$50,142,839**	**$97,729,759**	**$47,586,920**	**$108,680,192**	**$151,251,316**	**$309,140,931**	**$35,053,153**	**$77,367,236**	**-$6,346,813**	**$203,067,355**	**2.04**

11. Tables for Pennsylvania EDC Energy Efficiency and Conservation Plan

Contents

Table 1: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Program	Total Discounted Lifetime Costs ($000)	Total Discounted Lifetime Benefits ($000)	Total Discounted Net Lifetime Benefits ($000)	Total Resource Cost Test Ratio (TRC)
Residential	$48,523	$38,392	-$10,131	0.79
Residential Low-Income	$9,590	$19,288	$9,698	2.01
Residential Behavioral	$5,009	$7,049	$2,039	1.41
Low-Income Behavioral	$836	$958	$122	1.15
Large Commercial (C)	$36,173	$89,288	$53,115	2.47
Large Industrial (I)	$11,168	$49,146	$37,977	4.40
Small C&I	$39,951	$105,021	$65,070	2.63
Total	**$151,251**	**$309,141**	**$157,890**	**2.04**

Table 2: Summary of Portfolio Energy Savings

MWh Saved for Consumption Reductions (Meter Level)	PY13		PY14		PY15		PY16		PY17		Total	
	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh	1st-Year MWh	Lifetime MWh
Baseline											14,085,512	
Residential Cumulative Savings	11,809	84,278	24,951	174,514	38,393	266,912	50,947	359,140	62,826	451,708	62,826.000	451,708
Low-Income Cumulative Savings	4,618	31,640	8,671	62,387	12,758	93,423	16,876	124,738	21,132	156,586	21,132.000	156,586
Commercial/Industrial, Large Inc	16,059	210,986	20,452	271,058	25,093	333,054	28,511	377,806	24,589	328,955	114,704.300	1,521,860
EE&C Plan Total Incremental Annual	45,391	513,381	51,872	597,300	58,591	686,072	62,769	753,378	56,039	674,748	274,663	3,224,879
Percent of Plan Total Annual	16.5%		18.9%		21.3%		22.9%		20.4%			
EE&C Plan Total Cumulative	45,391	513,381	97,263	1,110,681	155,854	1,796,753	218,624	2,550,131	274,663	3,224,879	274,663	3,224,879
Percent of Plan Total	16.5%		35.4%		56.7%		79.6%		100.0%			
Estimated Phase IV Carryover Savings												
Total Cumulative Plan + Carryover	45,391	513,381	97,263	1,110,681	155,854	1,796,753	218,624	2,550,131	274,663	3,224,879	274,663	3,224,879
Percent of Plan Total	16.5%		35.4%		56.7%		79.6%		100.0%			
Percent Reduction from Baseline	0.32%		0.69%		1.11%		1.55%		1.95%			
Phase V Target[1]											261,583	
Portfolio Percent of Phase V Target	17.4%		37.2%		59.6%		83.6%		105.0%		105.0%	

[1] Phase V Implementation Order Table 11: Final Consumption Reduction Targets, by EDC, page 48.

Table 3: Summary of Portfolio Demand Savings

MWh Saved for Consumption Reductions (Meter Level)	PY18 1st-Year MW	PY19 1st-Year MW	PY20 1st-Year MW	PY21 1st-Year MW	PY22 1st-Year MW	Total 1st-Year MW
Baseline[1]	2,518	2,518	2,518	2,518	2,518	2,518
Market Rate Residential Sector (*exclusive of Low-Income*) – Projected Incremental Annual Savings	1.92	2.01	2.05	1.96	1.91	9.854
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	1.40	1.42	1.43	1.44	1.46	7.155
Small C&I Sector – Projected Incremental Annual Savings	1.96	2.18	2.49	2.79	2.33	11.748
Large C&I Sector – Projected Incremental Annual Savings	1.675	2.481	3.176	3.583	3.373	14.288
Coincident Demand Reduction From EE Subtotal	6.961	8.090	9.150	9.777	9.067	43.045
Residential Load Shifting - Projected MW Savings	0.48	0.50	0.51	0.49	0.47	2.442
Small C&I Sector Load Shifting – Projected MW Savings						
Large C&I Sector Load Shifting – Projected MW Savings	0.41	0.47	0.61	0.74	0.47	2.700
Daily Load Shifting Subtotal	0.881	0.971	1.116	1.229	0.945	5.142
Cumulative Projected Compliance Savings[2]	7.842	9.061	10.266	11.006	10.013	48.187
Cumulative EE&C Plan Total – Percentage of Target to be Met[3]	16.9%	19.5%	22.1%	23.7%	21.5%	103.6%
Estimated Phase IV Carryover Savings [5]						
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	7.842	9.061	10.266	11.006	10.013	48.187
Cumulative Percent Reduction from Baseline	0.3%	0.4%	0.4%	0.4%	0.4%	1.9%
Commission-Identified Goal[1]						46.5

1 As defined in the June 18, 2025 Implementation Order.

2 Cumulative totals reflect one-fifth of the expected MW savings from load shifting programs due to the average performance accounting method. EE program savings are additive across program years, while Load Shifting programs average across the Phase.

3 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

4 MW saved are on a gross-verified basis.

5 50% of any excess Phase IV demand reduction can be claimed as carryover.

Table 4: Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW [1]	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW
Coincident Reduction from EE - Residential	3.4	3.3	3.5	3.4	3.6	3.5	3.5	3.3	3.4	3.2	17.4	16.6
Coincident Reduction from EE - Non-Residential	5.4	2.7	6.3	3.3	7.4	4.0	8.4	4.6	7.1	3.8	34.6	18.4
Daily Load Shifting - Residential [3]	2.3	2.6	2.3	2.6	2.3	2.6	2.3	2.6	2.3	2.6	2.3	2.6
Daily Load Shifting - Non-Residential	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2
Total											56.5	39.9
Phase V Peak Demand Reduction Target											46.5	
Percentage of Goal In Season [2]											121%	86%

1 MW saved are on a gross-verified basis, and MW are at the system-level.

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year. The cells with the percentage of goal in each season (M12 and N12) will appear green if this condition has been met.

3 Daily load-shifting savings average across the phase, EE sums across the phase.

Note: The chart was not programmed to verify minimum 15% per year, it should be checking minimum 75% reduction in the lesser season.

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	$000	%	$000	%	$000	%	$000	%	$000	%	$000	%
Residential Portfolio Budget	3,393	20.9%	3,703	19.8%	3,811	18.2%	3,725	16.8%	3,678	18.6%	18,310	18.7%
Residential Low-Income Portfolio Budget	3,237	20.0%	3,149	16.8%	3,178	15.2%	3,207	14.5%	3,261	16.5%	16,033	16.4%
Commercial/Industrial Small Portfolio Budget	4,102	25.3%	4,594	24.6%	5,327	25.5%	6,025	27.2%	4,899	24.8%	24,947	25.5%
Commercial/Industrial Large Portfolio Budget	4,608	28.4%	6,378	34.1%	7,698	36.8%	8,343	37.6%	7,006	35.5%	34,032	34.8%
Common Costs	881	5.4%	881	4.7%	881	4.2%	881	4.0%	881	4.5%	4,407	4.5%
Total Portfolio Budget	**16,222**	**100.0%**	**18,705**	**100.0%**	**20,896**	**100.0%**	**22,181**	**100.0%**	**19,726**	**100.0%**	**97,729.759**	**100.0%**
SWE Cost											N/A	

Table 6: Program Summaries

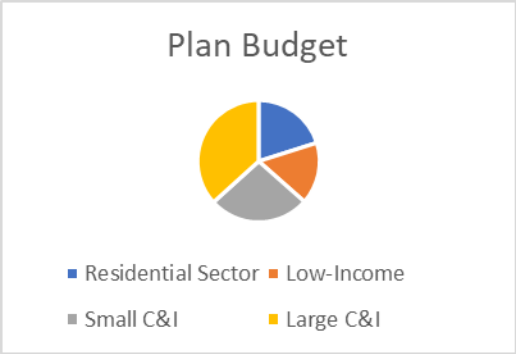
	Program Name	Program Market	Program Two Sentence Summary	Program Years Operated	Lifetime Savings MWh	Lifetime Savings MW	Portfolio Savings	
							MWh %	MW %
Residential Portfolio Programs								
	Appliance Recycling	Market Rate Residential	Provides customer incentives to recycle listed inefficient appliances in order to remove them from the electric grid.	5	41,893	1.145	1.3%	2.4%
	Online Marketplace	Market Rate Residential	Energy efficiency rebates to offset costs of more energy efficient consumer products. Customer engagement is mail-in or online form- based rebate applications.	5	58,583	3.015	1.8%	6.3%
	Midstream Incentives	Market Rate Residential	Energy efficiency rebates to offset costs of more energy efficient consumer products. Customer engagement is retail point-of-purchase and online instant rebates.	5	290,831	1.086	9.0%	2.3%
	Residential Behavioral Energy Efficiency	Market Rate Residential	Educates participants on electricity consumption to change household behavior leading to less electricity use.	5	60,400	7.050	1.9%	14.6%
	Low-Income Energy Efficiency	Low-Income Residential	Comprised of energy efficiency audits and the direct-installation of energy efficiency equipment at no cost to program participants.	5	148,186	6.265	4.6%	13.0%
	Low-Income Behavioral Efficiency	Low-Income Residential	Provides educational messaging via electronic and paper mail tailored to the low-income sector. Educates participants on electricity consumption to change household behavior leading to less electricity use.	5	8,400	0.890	0.3%	1.8%
	Subtotal				**608,294**	**19.451**	**18.9%**	**40.4%**

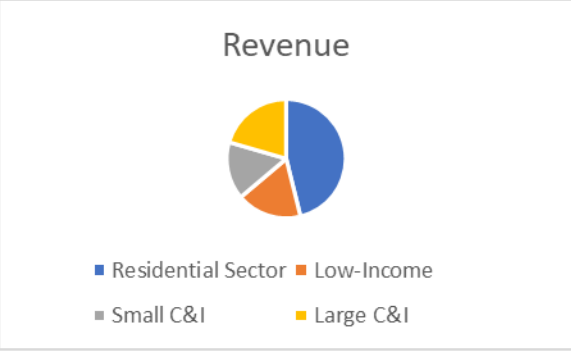
Table 6: Program Summaries (*continued*)

	Program Name	Program Market	Program Two Sentence Summary	Program Years Operated	Lifetime Savings MWh	Lifetime Savings MW	Portfolio Savings MWh %	Portfolio Savings MW %
Commercial/Industrial (C&I) Small Portfolio								
	Small-Medium Nonresidential Energy Efficiency	C&I Customer <300 kW	The program employs midstream incentives, downstream incentives and direct-install engagement channels to serve the small-medium commercial and industrial customers with maximum peak demand less than 300 kW.	5	1,094,724	11.748	33.9%	24.4%
	Subtotal				**1,094,724**	**11.748**	**33.9%**	**24.4%**
Commercial/Industrial Large Portfolio								
	Large Commercial Efficiency	C&I Customer ≥300 kW	Energy efficiency rebates to offset costs of more energy efficient lighting, refrigeration and mechanical system products. Customer engagement is mail-in or online form- based rebate applications.	5	639,102	8.504	19.8%	17.6%
	Large Indusrial Efficiency	C&I Customer ≥300 kW	Energy efficiency rebates to offset costs of more energy efficient lighting, refrigeration and mechanical system products. Customer engagement is mail-in or online form- based rebate applications.	5	566,987	5.329	17.6%	11.1%
	Public Agency Partnership	GNI Customer ≥300 kW	Through the program Duquesne Light enters into memoranda of understanding with local governments to serve its jurisdictional agencies and develop and implement energy efficiency action plans.	5	315,771	3.155	9.8%	6.5%
	Subtotal				**1,521,860**	**16.988**	**47.2%**	**35.3%**
Plan Total					**3,224,879**	**48.1874**	**100.0%**	**100.0%**

Table 7: Budget and Parity Analysis Summary

Customer Sector	Phase V EE&C Budget	% of Total EE&C Budget	% EDC Annual Revenue	% EDC MWh Sales
Residential Sector	19,657,579	20.1%	46.1%	23.2%
Low-Income Sector	16,032,660	16.4%	17.7%	8.9%
Residential Subtotal	35,690,239	36.5%	63.8%	32.1%
Commercial/Industrial Small Sector	26,166,519	26.8%	15.6%	25.2%
Commercial/Industrial Large Sector	35,873,001	36.7%	20.5%	42.7%
Nonresidential Subtotal	62,039,520	63.5%	36.2%	67.9%
All Classes	97,729,759	100.0%	100.0%	100.0%
Other Expenditures				
EDC Total	**97,729,759**			





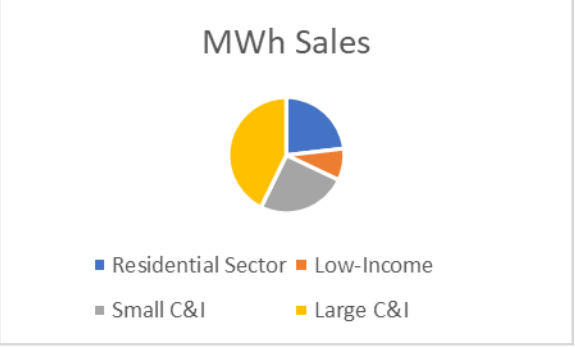


Table 8A: Eligible Measures - Residential

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
LED Parking Garage and Canopy Fixtures and Retrofit Kits	Fixture	Yes	No	Direct Install	$17.46	15	$13.97 - $20.95
LED Replacement Lamps (Tubes)-2' & 4'	Lamp	Yes	No	Direct Install	$17.46	7	$13.97 - $20.95
Lighting - LED A-Line	Lamp	Yes	No	Direct Install	$10.85	4	$5.96 - $20.95
Lighting - LED Globe/Specialty	Lamp	Yes	No	Direct Install	$10.87	4	$5.98 - $20.95
Lighting - LED Other	Lamp	Yes	No	Direct Install	$17.46	8	$13.97 - $20.95
Lighting - LED Reflector	Lamp	Yes	No	Direct Install	$11.49	4	$6.81 - $20.95
Residential Occupancy Sensors	Unit	Yes	No	Direct Install	$13.92	8	$11.14 - $16.70
LED Nightlight	Lamp	Yes	No	Direct Install or Kit	$7.18	8	$5.75 - $8.62
Holiday Lights	Light Strand	Yes	No	Replacing Incandescent	$9.98	10	$7.98 - $11.98
Air Source Heat Pump - SEER 17.5 / SEER2 16.3 HSPF 9.7 / HSPF2 8.2 +	Unit	Yes	Yes	SEER 17.5/SEER2 16.3 HSPF 9.7/HSPF2 8.2 or higher	$17.46	15	$13.97 - $20.95
Central Air Conditioner SEER 17.5 / SEER2 16.3	Unit	Yes	Yes	SEER 17.5 / SEER2 16.3 or higher	$17.46	15	$13.97 - $20.95
Ductless Mini-Split ENERGY STAR Cold Climate rated	Unit	Yes	Yes	SEER/2-16.1/15.2, HSPF/2 10.0/8.5 DI	$17.46	15	$13.97 - $20.95
Duct Sealing & Duct Insulation	Project	Yes	No	Per TRM Section 2.2.10	$149.67	15	$119.74 - $179.60
Air Handler Filter Whistles	Unit	Yes	No	Per TRM Section 2.2.11	$3.26	5	$2.61 - $3.91
Energy Star Certified Smart Thermostat	Unit	Yes	No	Per TRM Section 2.2.12	$246.81	9	$60.00 - $277.15
Furnace Maintenance	Unit	Yes	No	Per TRM Section 2.2.13	$2.85	3	$2.28 - $3.42
Furnace Circulation Fan - High Efficiency (ECM - Variable Speed)	Furnace	Yes	No	Existing PSC fan motor	$17.46	15	$13.97 - $20.95
GSHP Desuperheaters	Unit	Yes	No	Existing electric water heater	$213.32	15	$170.66 - $255.99
Air Conditioner & Heat Pump Maintenance	Unit	Yes	No	Existing central, ductless, or packaged HVAC system	$225.00	3	$180.00 - $270.00
Window Heat Pump	Unit	Yes	Yes	Direct Install	$836.06	9	$668.85 - $1,003.27
Heat Pump Water Heater	Water Heater	Yes	Yes	Per TRM Section 2.3.1	$404.67	10	$13.97 - $720.00
Smart Water Heater Controls	Unit	Yes	Yes	Per TRM Section 2.3.10	$12.58	11	$10.07 - $15.10
Solar Water Heaters	Unit	Yes	Yes	Per TRM Section 2.3.2	$802.05	15	$641.64 - $962.46
Water Heater Tank Wrap	Unit	Yes	No	Per TRM Section 2.3.3	$39.92	7	$31.94 - $47.91
Water Heater Temperature Setback	Water Heater	Yes	No	Per TRM Section 2.3.4	$25.59	2	$20.47 - $30.71
Thermostatic Showerhead	Showerhead	Yes	No	Per TRM Section 2.3.8	$37.05	15	$29.64 - $44.46
Drain Water Heat Recovery Units	Unit	Yes	No	Per TRM Section 2.3.9	$99.04	15	$79.23 - $118.84
ENERGY STAR Ceiling Fans	Unit	Yes	No	ENERGY STAR qualified	$10.75	10	$8.60 - $12.90
Refrigerator / Freezer Recycling with and without Replacement	Freezer	Yes	No	Functioning existing unit	$17.46	6	$13.97 - $20.95
Refrigerator / Freezer Recycling with and without Replacement	Refrigerator	Yes	No	Functioning existing unit	$17.46	6	$13.97 - $20.95
Low-Capacity Refrigerator / Freezer Recycling without Replacement	Unit	Yes	No	Functioning existing unit	$95.36	5	$51.93 - $150.98
ENERGY STAR Coolers	Unit	Yes	Yes	ENERGY STAR qualified	$15.78	14	$12.62 - $18.94
Cooler Recycling with and without Replacement	Unit	Yes	No	Functioning existing unit	$67.00	7	$35.13 - $108.11

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Residential Induction Cooktop	Unit	Yes	No	Per TRM Section 2.4.7	$5.20	15	$4.16 - $6.24
Advanced Power Strips	Unit	Yes	No	Tier I or II	$42.35	5	$8.00 - $53.21
Air Sealing	Home	Yes	Yes	Blower door testing	$17.46	15	$13.97 - $20.95
Weather Stripping	Roll	Yes	No	Projects < 400 kWh savings	$22.03	15	$4.00 - $28.25
Insulation, Basement Wall	Home	Yes	Yes	Per TRM Section 2.6.3	$17.46	15	$13.97 - $20.95
Insulation, Exterior Wall	Home	Yes	Yes	Per TRM Section 2.6.3	$17.46	15	$13.97 - $20.95
Insulation, Floor	Home	Yes	Yes	Per TRM Section 2.6.3	$17.46	15	$13.97 - $20.95
Insulation, Ceiling	Home	Yes	Yes	Per TRM Section 2.6.3	$17.46	15	$13.97 - $20.95
Basement or Crawl Space Wall Insulation	Insulation Addition	Yes	Yes	Per TRM Section 2.6.4	$0.02	15	$0.02 - $0.03
ENERGY STAR Windows	Sq Ft	Yes	Yes	ENERGY STAR qualified	$3.85	15	$3.08 - $4.62
Residential New Construction	Home	Yes	Yes	Per TRM Section 2.7.1	$4,893.00	15	$3,914.40 - $5,871.60
ENERGY STAR Manufactured Homes	Home	Yes	Yes	ENERGY STAR qualified	$1,037.00	15	$829.60 - $1,244.40
Home Energy Reports	Population	Yes	No	Per TRM Section 2.7.3	$0.00	2	$0.00 - $0.00
ENERGY STAR Pool Pumps	Unit	Yes	No	ENERGY STAR qualified	$45.21	10	$36.17 - $54.25
Single Speed Pool Pump Replacement	Unit	Yes	No	Replacing single speed pump	$499.01	3	$399.21 - $598.82
Photovoltaic (PV) Solar Generation	Project	Yes	Yes	Per TRM Section 2.8.3	$7,640.00	15	$6,112.00 - $9,168.00
Kit - Electric Hot Water Kit (SF or MF)	Kit	Yes	No	Program provided	$17.46	15	$13.97 - $20.95
Kit - Gas Hot Water Kit (SF or MF)	Kit	Yes	No	Program provided	$17.46	10	$13.97 - $20.95
Energy Star Bathroom Exhaust Fan	Unit	No	No	Per TRM Section 2.2.14	$300.00	15	$20.00 - $30.00
Heat Pump <5.4 Tons	Unit	No	Yes	Per TRM Section 2.2.2	$2,176.20	15	$680.00 - $1,020.00
Air Conditioner <5.4 Tons	Unit	No	Yes	Per TRM Section 2.2.2	$1,632.15	15	$400.00 - $600.00
Mini/Multi Split Heat Pump	Unit	No	Yes	ENERGY STAR version 6.1	$2,176.20	15	$256.00 - $384.00
Mini/Multi Split Air Conditioner	Unit	No	Yes	ENERGY STAR version 6.1	$1,632.15	15	$192.00 - $288.00
Room Air Conditioner	Unit	No	Yes	Per TRM Section 2.2.7	$350.00	9	$20.00 - $30.00
Room A/C – Recycling	Unit	No	No	Recycling of existing, working room AC with or without replacement	$82.53	9	$13.97 - $114.47
Water Heater Pipe Insulation	Unit	No	No	Per TRM Section 2.3.5	$11.92	11	$1.60 - $16.03
Low-Flow Faucet Aerator	Unit	No	No	Per TRM Section 2.3.6	$5.71	10	$0.80 - $9.28
Low-Flow Showerhead	Unit	No	No	Per TRM Section 2.3.7	$28.52	10	$4.00 - $32.91
Thermostatic Shower Restriction Valves	Unit	No	No	Per TRM Section 2.3.8	$30.00	15	$8.00 - $12.00
Energy Star Refrigerator	Unit	No	Yes	ENERGY STAR qualified	$145.00	8	$40.00 - $150.47
Energy Star Freezer	Unit	No	Yes	ENERGY STAR qualified	$204.75	8	$40.00 - $114.47
Energy Star Dishwashers	Unit	No	Yes	ENERGY STAR qualified	$750.00	10	$40.00 - $60.00
Energy Star Dehumidifiers	Unit	No	Yes	ENERGY STAR qualified	$249.00	12	$40.00 - $60.00
Dehumidifier – Recycling	Unit	No	No	Functioning existing unit	$95.39	4	$76.31 - $114.47
Energy Star Air Purifiers	Unit	No	No	ENERGY STAR qualified	$115.00	9	$20.00 - $30.00
Energy Star Freezer	Unit	No	Yes	ENERGY STAR qualified	$204.75	8	$40.00 - $114.47
Energy Star Clothes Washer	Unit	No	Yes	ENERGY STAR qualified	$1,000.00	14	$20.00 - $30.00
Energy Star Clothes Dryer	Unit	No	Yes	ENERGY STAR qualified	$1,000.00	14	$20.00 - $30.00
Caulking	Unit	No	No	Projects < 400 kWh savings	$20.00	15	$4.00 - $6.00
Outlet Gaskets	Unit	No	No	Projects < 400 kWh savings	$2.00	15	$0.20 - $0.30
Direct Load Control & Behavior-Based Demand Response Programs	kW	No	No	Per TRM Section 2.9.1	$250.00	11	$320.00 - $480.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Smart Energy Service Panel	kW	No	No	Per TRM Section 2.9.1	$250.00	11	$320.00 - $480.00
Optimize Energy Star Thermostats	kW	No	No	Per TRM Section 2.9.1	$0.10	11	$0.00 - $0.00
Managed EV Charging, 3 - 9 PM	kW	No	No	Per TRM Section 2.9.1	$50.00	11	$320.00 - $480.00
Energy Star Level 2 EV Charger, Networked	Unit	No	No	ENERGY STAR qualified	$47.00	15	$320.00 - $480.00
Customer Front-of-the-Meter	Project	No	No	System benefit provided	$1,987.66	15	$224.71 - $337.06

Table 8B: Eligible Measures - Nonresidential

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Lighting Retrofits, Custom	Fixture	N/A	N/A	Design Lights Consortium Listed	$3.59	11	$6.40 - $9.60
LED Downlight with Integrated Occupancy Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$99.22	15	$20.00 - $30.00
LED Downlight with Integrated Occupancy and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$109.22	15	$24.00 - $36.00
High Output Linear LED T5/T8 Fixture	lamp	N/A	N/A	Design Lights Consortium Listed	$125.05	15	$20.00 - $60.00
LED 2' Linear Replacement Lamp	lamp	N/A	N/A	Design Lights Consortium Listed	$13.03	15	$2.00 - $3.00
LED 3' Linear Replacement Lamp	lamp	N/A	N/A	Design Lights Consortium Listed	$13.23	15	$2.40 - $3.60
LED 4' Interior Linear Strip Fixture or Retrofit Kit	Fixture	N/A	N/A	Design Lights Consortium Listed	$245.78	15	$20.00 - $150.17
LED 4' Linear Replacement Lamp	lamp	N/A	N/A	Design Lights Consortium Listed	$13.94	15	$4.59 - $7.20
LED 8' Interior Linear Strip Fixture or Retrofit Kit	Fixture	N/A	N/A	Design Lights Consortium Listed	$425.82	15	$32.00 - $222.41
LED 8' Linear Replacement Lamp	lamp	N/A	N/A	Design Lights Consortium Listed	$35.85	15	$5.60 - $119.05
LED Exterior Area Lighting Fixture	Fixture	N/A	N/A	Design Lights Consortium Listed	$403.75	15	$36.00 - $598.68
LED Interior 1' X 2'	Fixture	N/A	N/A	Design Lights Consortium Listed	$91.66	15	$12.00 - $18.00
LED Interior 1' X 4'	Fixture	N/A	N/A	Design Lights Consortium Listed	$126.77	15	$16.00 - $169.12
LED Interior High-Bay Fixture	Fixture	N/A	N/A	Design Lights Consortium Listed	$335.75	15	$44.00 - $371.28
LED Interior 2' X 2'	Fixture	N/A	N/A	Design Lights Consortium Listed	$106.46	15	$14.74 - $169.18
LED Interior 2' X 4'	Fixture	N/A	N/A	Design Lights Consortium Listed	$140.83	15	$16.82 - $189.02
LED 4' Interior Linear Strip Fixture or Retrofit Kit	lamp	N/A	N/A	Design Lights Consortium Listed	$245.78	15	$20.00 - $150.17
LED 8' Interior Linear Strip Fixture or Retrofit Kit	lamp	N/A	N/A	Design Lights Consortium Listed	$425.82	15	$32.00 - $222.41
New Construction Lighting	kWh	N/A	N/A	Per TRM Section 3.1.2	$2.21	15	$0.33 - $0.50
Lighting Controls	Unit	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$52.67	8	$20.00 - $30.00
LED Downlight with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$115.22	15	$32.00 - $48.00
LED Troffer and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$134.32	15	$40.00 - $126.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
LED Surface and Suspended Linear Luminaire and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$151.06	15	$36.00 - $72.00
LED Low-Bay Luminaire and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$98.88	15	$40.00 - $60.00
LED High-Bay Luminaire and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$142.63	15	$52.00 - $156.00
LED Exterior Luminaire and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$252.83	15	$32.00 - $138.00
LED Parking Garage Lighting with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$199.60	15	$44.00 - $138.00
LED Canopy Luminaire and Retrofit Kit with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$244.03	15	$48.00 - $144.00
LED Stairwell and Passageway Luminaire with NLC/LLLC	Fixture	N/A	N/A	Per TRM Section 3.1.1/3.1.3	$212.51	15	$36.00 - $54.00
Occupancy sensor, ceiling or wall mounted	Sensor	N/A	N/A	Per TRM Section 3.1.3	$62.50	8	$16.00 - $24.00
Occupancy sensor, high bay fixture-integrated	Sensor	N/A	N/A	Per TRM Section 3.1.3	$40.39	8	$16.00 - $24.00
Occupancy sensor, networked lighting controls	Sensor	N/A	N/A	Per TRM Section 3.1.3	$75.00	8	$36.00 - $54.00
LED Exit Sign	Unit	N/A	N/A	Per TRM Section 3.1.4	$66.16	15	$16.00 - $27.94
LED Refrigeration Display Case Lighting	Door	N/A	N/A	Per TRM Section 3.1.5	$150.00	8	$14.96 - $22.44
LED Troffer and Retrofit Kit with Integrated Occupancy Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$118.31	15	$28.00 - $48.00
LED Troffer and Retrofit Kit with Integrated Occupancy and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$128.32	15	$32.00 - $54.00
LED Surface and Suspended Linear Luminaire and Retrofit Kit with Integrated Occupancy Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$134.82	15	$24.00 - $54.00
LED Surface and Suspended Linear Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$145.00	15	$28.00 - $60.00
LED Low-Bay Luminaire and Retrofit Kit with Integrated Occupancy Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$82.88	15	$28.00 - $42.00
LED Low-Bay Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$92.88	15	$32.00 - $48.00
LED High-Bay Luminaire and Retrofit Kit with Integrated Occupancy Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$126.67	15	$40.00 - $138.00
LED High-Bay Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$136.67	15	$44.00 - $144.00
LED Exterior Luminaire and Retrofit Kit with Integrated Motion Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$237.22	15	$28.00 - $132.00
LED Parking Garage Lighting with Integrated Motion Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$181.38	15	$32.00 - $120.00
LED Parking Garage Lighting with Integrated Motion and Daylight Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$191.28	15	$36.00 - $126.00
LED Canopy Luminaire and Retrofit Kit with Integrated Motion Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$222.64	15	$44.00 - $138.00
LED Stairwell and Passageway Luminaire with Integrated Motion Sensor	Unit	N/A	N/A	Design Lights Consortium Listed	$194.51	15	$32.00 - $48.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Indoor Horticultural Lighting	Fixture	N/A	N/A	Design Lights Consortium Listed	$582.00	7	$286.35 - $429.52
Cycling Refrigerated Thermal Mass Dryer	Unit	N/A	N/A	Existing non-cycling dryer	$500.00	10	$240.00 - $360.00
Air-Entraining Air Nozzle	Unit	N/A	N/A	Existing non-air entraining nozzle	$209.01	15	$31.36 - $47.04
No-loss Condensate Drain	Unit	N/A	N/A	Existing timed drain	$244.00	10	$40.00 - $60.00
Air Receiver Tanks for Load, No Load Compressors	Unit	N/A	N/A	Per TRM Section 2.10.4	$1,246.59	15	$640.00 - $1,800.00
Variable-Speed Drive Air Compressor	Unit	N/A	N/A	<= 40 HP compressor	$5,368.04	13	$200.00 - $2,640.00
Compressed Air Controller	Compressed Air System	N/A	N/A	Per TRM Section 2.10.6	$1,286.34	13	$16.00 - $1,800.00
Low Pressure Drop Filter for Compressed Air Systems	Unit	N/A	N/A	Existing standard coalescing filter	$1,000.00	10	$160.00 - $240.00
Compressed Air Mist Eliminators	HP	N/A	N/A	Per TRM Section 2.10.8	$37.89	5	$1.91 - $2.86
High Efficiency Transformer	Unit	N/A	N/A	Greater than federal minimum efficiency	$380.83	15	$57.15 - $85.72
Engine Block Heater Timer	Unit	N/A	N/A	Existing heater without timer	$16.64	15	$47.21 - $70.82
High Frequency Battery Chargers	Unit	N/A	N/A	Existing SCR or ferroresonant charger	$402.48	15	$53.44 - $80.17
Uninterruptible Power Supply (UPS)	Unit	N/A	N/A	ENERGY STAR qualified	$46.80	7	$1.11 - $1.67
Building Operator Certification	Certified Employee	N/A	N/A	Facilities > 20,000 sq. ft.	$1,895.00	13	$1,516.00 - $2,274.00
Photovoltaic (PV) Solar Generation	project	N/A	N/A	Per TRM Section 3.11.6	$387,835.16	15	$3,428.94 - $157,544.40
Load Curtailment for Commercial and Industrial Programs	kW	N/A	N/A	Per TRM Section 3.12.1	$99.13	1	$320.00 - $480.00
Packaged Terminal AC or PTHP 12.0 EER	Tons	N/A	N/A	12.0 EER	$639.54	15	$52.00 - $78.00
Unitary HVAC 135-240k AC unit, Min 11.5 EER 13 IEER	Tons	N/A	N/A	11.5 EER 13.2 IEER	$879.90	15	$60.00 - $90.00
Unitary HVAC 65-135k AC unit, Min 11.5 EER 13.2 IEER	Tons	N/A	N/A	11.5 EER 13.2 IEER	$852.00	15	$60.00 - $90.00
Controls: Guest Room Occupancy Sensor	Unit	N/A	N/A	Per TRM Section 3.2.10	$227.54	11	$34.14 - $51.22
Controls: Economizer	Unit	N/A	N/A	Per TRM Section 3.2.11	$174.94	3	$268.10 - $402.15
Computer Room Air Conditioner	Tons	N/A	N/A	Per TRM Section 3.2.12	$48.63	15	$7.30 - $10.95
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	HP	N/A	N/A	Per TRM Section 3.2.13	$788.19	15	$118.27 - $177.41
Computer Room Air Conditioner/Handler VSD on AC Fan Motors	HP	N/A	N/A	Per TRM Section 3.2.14	$966.89	15	$145.09 - $217.63

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Circulation Fan: High-Volume Low-Speed	Unit	N/A	N/A	Per TRM Section 3.2.15	$2,647.96	15	$397.34 - $596.01
Demand Controlled Ventilation	HVAC Unit	N/A	N/A	Per TRM Section 3.2.16	$1,612.91	15	$242.03 - $363.04
Advanced Rooftop Controls	HVAC Unit	N/A	N/A	Per TRM Section 3.2.17	$116.86	10	$17.54 - $26.30
C&I Energy Star Certified Connected Thermostats	Unit	N/A	N/A	Per TRM Section 3.2.18	$230.96	11	$28.80 - $43.19
Adjustment of Programmable Thermostats	Unit	N/A	N/A	Per TRM Section 3.2.19	$100.00	11	$0.00 - $0.00
HP <5.4 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$1,093.00	15	$48.00 - $72.00
Air Conditioner <5.4 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$819.00	15	$48.00 - $72.00
Unitary Heat Pump 5.4 to 11.3 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$163.00	15	$48.00 - $72.00
Unitary Heat Pump 11.3 to 20 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$116.00	15	$80.00 - $120.00
Unitary Air Conditioner 20 to 63.3 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$96.00	15	$80.00 - $120.00
Unitary Air Conditioner >63.3 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$95.00	15	$48.00 - $72.00
Packaged Terminal Air Conditioner	Tons	N/A	N/A	Greater than federal minimum efficiency	$787.00	15	$52.00 - $78.00
Packaged Terminal Heat Pump	Tons	N/A	N/A	Greater than federal minimum efficiency	$787.00	15	$52.00 - $78.00
Variable Refrigerant Flow (VRF)	Tons	N/A	N/A	Per TRM Section 3.2.2	$300.00	15	$160.00 - $240.00
Duct Sealing and Insulation	HVAC Unit	N/A	N/A	Per TRM Section 3.2.20	$844.32	15	$126.70 - $190.04
Chilled Water Pipe Insulation	Ln Ft	N/A	N/A	Per TRM Section 3.2.21	$18.25	15	$8.00 - $12.00
Air Cooled Chiller	Tons	N/A	N/A	Greater than federal minimum efficiency	$351.00	15	$72.00 - $108.00
Water Cooled Chiller	Tons	N/A	N/A	Greater than federal minimum efficiency	$259.00	15	$40.00 - $60.00
Water Source Heat Pump	Tons	N/A	N/A	Greater than federal minimum efficiency	$327.00	15	$92.00 - $138.00
Ductless Mini-Split Heat Pumps – Commercial < 5.4 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$3,789.14	15	$244.03 - $366.05
Mini/Multi Split Heat Pump <5.4 Tons	Tons	N/A	N/A	Greater than federal minimum efficiency	$1,093.00	15	$64.00 - $96.00
Small C&I HVAC Refrigerant Charge Correction	Tons	N/A	N/A	HVAC system <= 20 tons	$46.17	3	$2.32 - $5.30
HVAC Tune Up	Tons	N/A	N/A	HVAC system <= 20 tons	$87.56	3	$4.80 - $10.95

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Room Air Conditioner	Unit	N/A	N/A	Greater than federal minimum efficiency	$516.31	9	$3.00 - $4.50
Premium Efficiency Motors	Unit	N/A	N/A	Per TRM Section 3.3.1	$41.16	15	$6.18 - $9.26
VFD - HVAC Fan Motor	HP	N/A	N/A	Existing motor without a VFD control	$1,015.87	15	$60.00 - $90.00
VFD - HVAC Pump Motor	HP	N/A	N/A	Existing motor without a VFD control	$1,015.87	15	$60.00 - $90.00
VFD - Process Fan Motor	HP	N/A	N/A	Existing motor without a VFD control	$1,015.87	15	$80.00 - $120.00
VFD Process Pump Motor	HP	N/A	N/A	Existing motor without a VFD control	$1,015.87	15	$80.00 - $120.00
ECM Circulating Fan	Unit	N/A	N/A	Existing SP or PSC motor, <= 1 HP	$395.48	15	$160.00 - $240.00
VSD on Kitchen Exhaust Fan	HP	N/A	N/A	Existing motor without a VSD control	$1,886.45	15	$283.07 - $424.61
ECM Pumps	HP	N/A	N/A	Existing single-speed motor	$300.00	15	$80.00 - $120.00
PEI-Rated Pumps	Unit	N/A	N/A	Per TRM Section 3.3.6	$1,125.00	13	$300.00 - $450.00
Heat Pump Water Heater	Unit	N/A	N/A	Per TRM Section 3.4.1	$776.00	10	$400.00 - $600.00
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Program	Unit	N/A	N/A	Per TRM Section 3.4.2	$120.41	8	$120.45 - $180.67
Domestic Hot Water Pipe Insulation	Ln Ft	N/A	N/A	Per TRM Section 3.4.3	$6.31	15	$0.95 - $1.42
Energy Star Refrigeration/Freezer Cases	Unit	N/A	N/A	ENERGY STAR qualified	$2,124.00	12	$124.00 - $186.00
Auto-Closer for Walk-in Cooler Doors	Door	N/A	N/A	Per TRM section 3.5.10	$260.00	8	$40.00 - $312.00
Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers	Door	N/A	N/A	Per TRM section 3.5.11	$2,394.00	12	$60.00 - $90.00
Suction Pipe Insulation for Walk-In Coolers and Freezers	Ln Ft	N/A	N/A	Per TRM section 3.5.12	$15.00	11	$20.00 - $30.00
Refrigerated Display Cases with Doors Replacing Open Cases	Ln Ft	N/A	N/A	Per TRM section 3.5.13	$762.80	12	$160.00 - $240.00
Adding Doors to Existing Refrigerated Display Cases	Ln Ft	N/A	N/A	Per TRM section 3.5.14	$605.42	12	$80.00 - $120.00
Refrigerated Case Light Occupancy Sensors	Sensor	N/A	N/A	Per TRM section 3.5.15	$35.00	8	$20.00 - $30.00
Food Service Equipment Novelty Cooler Shutoff	Unit	N/A	N/A	Per TRM section 3.5.16	$503.26	10	$584.98 - $877.46
ECM motor for walk in freezer or cooler	Motor	N/A	N/A	Existing SP or PSC motor	$295.84	15	$60.00 - $355.01
ECM motors for reach-in freezer or cooler	Motor	N/A	N/A	Existing SP or PSC motor	$295.84	15	$60.00 - $355.01
Evaporator Fan Motor Controls	Fan Controlled	N/A	N/A	Existing motor without controls	$317.13	15	$253.70 - $380.55
Controls: Evaporator Fan Controllers	Fan Controlled	N/A	N/A	Existing motor without controls	$317.13	15	$60.00 - $90.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Controls: Floating Head Pressure Controls	Unit	N/A	N/A	Per TRM section 3.5.4	$531.43	15	$35.97 - $53.95
Anti-Sweat Heater Controls	Control	N/A	N/A	Per TRM section 3.5.5	$1,051.00	12	$160.00 - $1,261.20
Controls: Evaporator Coil Defrost Control	Evaporator	N/A	N/A	Existing cooler/freezer without defrost controls	$317.13	10	$60.00 - $380.55
Variable Speed Refrigeration Compressor	Unit	N/A	N/A	Per TRM section 3.5.7	$2,126.58	15	$12.00 - $18.00
Strip Curtains for Walk-In Freezers and Coolers	Door	N/A	N/A	Per TRM section 3.5.8	$130.00	4	$48.00 - $156.00
Night Covers for Display Cases	Unit	N/A	N/A	Per TRM section 3.5.9	$951.76	5	$32.55 - $48.82
Energy Star Clothes Washer	Unit	N/A	N/A	ENERGY STAR qualified	$676.89	9	$5.84 - $12.09
Energy Star Bathroom Ventilation Fan in Commercial Applications	Unit	N/A	N/A	ENERGY STAR qualified	$25.16	12	$3.78 - $5.66
Energy Star Ice Machines	Unit	N/A	N/A	ENERGY STAR qualified	$231.41	10	$42.60 - $63.90
Commercial Induction Cooktops	Unit	N/A	N/A	Minimum 80% cooking energy efficiency	$19.51	10	$2.93 - $4.39
Controls: Beverage And Snack Machine Controls	Unit	N/A	N/A	Per TRM Section 3.7.2	$234.30	5	$25.02 - $37.53
Energy Star Electric Steam Cooker	Unit	N/A	N/A	ENERGY STAR qualified	$3,588.53	12	$538.48 - $807.72
Energy Star Combination Oven	Unit	N/A	N/A	ENERGY STAR qualified	$15.75	12	$2.36 - $3.55
Energy Star Commercial Convection Oven	Unit	N/A	N/A	ENERGY STAR qualified	$1,122.57	12	$168.45 - $252.67
Energy Star Commercial Fryer	Unit	N/A	N/A	ENERGY STAR qualified	$96.49	12	$14.48 - $21.72
Energy Star Commercial Hot Food Holding Cabinet	Unit	N/A	N/A	ENERGY STAR qualified	$232.58	12	$34.90 - $52.35
Energy Star Commercial Dishwasher	Unit	N/A	N/A	ENERGY STAR qualified	$1,242.84	10	$806.04 - $1,209.06
Energy Star Commercial Griddle	Unit	N/A	N/A	ENERGY STAR qualified	$1,106.79	12	$166.08 - $249.12
Wall And Ceiling Insulation	Sq Ft	N/A	N/A	Per TRM Section 3.8.1	$2,725.40	15	$408.96 - $613.44
Advanced Power Strips	Unit	N/A	N/A	Tier I or II	$40.91	5	$4.99 - $7.49
Energy Star Servers	Unit	N/A	N/A	ENERGY STAR qualified	$419.74	4	$46.27 - $69.41
Server Virtualization	Unit	N/A	N/A	Per TRM Section 3.9.3	$68.06	4	$21.29 - $31.94
Custom, Compressed Air	kWh	N/A	N/A	Custom per project	$0.22	15	$0.06 - $0.14
Combined Heat and Power	kWh	N/A	N/A	Custom per project	$0.16	15	$0.10 - $0.14
Custom, HVAC	kWh	N/A	N/A	Custom per project	$0.16	15	$0.06 - $0.14
Custom, Lighting	kWh	N/A	N/A	Custom per project	$0.16	15	$0.06 - $0.14
Custom, Other	kWh	N/A	N/A	Custom per project	$0.35	13	$0.06 - $0.14
Custom, Process	kWh	N/A	N/A	Custom per project	$0.16	15	$0.06 - $0.14
Custom, Refrigeration	kWh	N/A	N/A	Custom per project	$0.16	14	$0.06 - $0.14
Retrocommissioning	Project	N/A	N/A	>= 10% facility savings	$55,000.00	15	$32,000.00 - $48,000.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)
Strategic Energy Management	Project	N/A	N/A	>= 10% facility savings	$71,366.06	15	$16,000.00 - $24,000.00
Virtual Commissioning	Project	N/A	N/A	>= 10% facility savings	$15,000.00	7	$8,160.00 - $12,240.00
Virtual SEM	Project	N/A	N/A	>= 10% facility savings	$27,200.00	7	$16,000.00 - $24,000.00
Custom, Cooling	project	N/A	N/A	Custom per project	$0.20	12	$0.06 - $0.14
Customer Front-of-the-Meter	Project	N/A	N/A	System benefit provided	$198,766.44	15	$18,913.00 - $28,369.50

Table 9: Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
LED Parking Garage and Canopy Fixtures and Retrofit Kits	2.1.1	Energy Savings (MWh)	32.82	32.82	32.82	32.82	32.82	164.10
		Summer Demand Reduction (MW)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0073
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	60	60	60	60	60	301
LED Replacement Lamps (Tubes)-2' & 4'	2.1.1	Energy Savings (MWh)	507.33	507.33	507.33	507.33	507.33	2,536.66
		Summer Demand Reduction (MW)	0.0693	0.0693	0.0693	0.0693	0.0693	0.3464
		Winter Demand Reduction (MW)	0.0668	0.0668	0.0668	0.0668	0.0668	0.3341
		Projected Participation	6,356	6,356	6,356	6,356	6,356	31,782
Lighting - LED A-Line	2.1.1	Energy Savings (MWh)	384.90	384.90	384.90	384.90	384.90	1,924.50
		Summer Demand Reduction (MW)	0.3620	0.3620	0.3620	0.3620	0.3620	1.8099
		Winter Demand Reduction (MW)	0.4336	0.4336	0.4336	0.4336	0.4336	2.1682
		Projected Participation	16,731	16,731	16,731	16,731	16,731	83,654
Lighting - LED Globe/Specialty	2.1.1	Energy Savings (MWh)	171.30	171.30	171.30	171.30	171.30	856.49
		Summer Demand Reduction (MW)	0.1609	0.1609	0.1609	0.1609	0.1609	0.8046
		Winter Demand Reduction (MW)	0.1928	0.1928	0.1928	0.1928	0.1928	0.9639
		Projected Participation	4,958	4,958	4,958	4,958	4,958	24,788
Lighting - LED Other	2.1.1	Energy Savings (MWh)	484.76	484.76	484.76	484.76	484.76	2,423.78
		Summer Demand Reduction (MW)	0.4018	0.4018	0.4018	0.4018	0.4018	2.0088
		Winter Demand Reduction (MW)	0.2975	0.2975	0.2975	0.2975	0.2975	1.4873
		Projected Participation	3,427	3,427	3,427	3,427	3,427	17,137
Lighting - LED Reflector	2.1.1	Energy Savings (MWh)	98.94	98.94	98.94	98.94	98.94	494.70
		Summer Demand Reduction (MW)	0.0935	0.0935	0.0935	0.0935	0.0935	0.4677

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.1121	0.1121	0.1121	0.1121	0.1121	0.5604
		Projected Participation	4,338	4,338	4,338	4,338	4,338	21,688
Residential Occupancy Sensors	2.1.2	Energy Savings (MWh)	0.04	-	-	-	-	0.04
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
LED Nightlight	2.1.3	Energy Savings (MWh)	42.58	42.58	42.58	42.58	42.58	212.88
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	2,065	2,065	2,065	2,065	2,065	10,326
Holiday Lights	2.1.4	Energy Savings (MWh)	0.00	-	-	-	-	0.00
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Air Source Heat Pump - SEER 17.5 / SEER2 16.3 HSPF 9.7 / HSPF2 8.2 +	2.2.1	Energy Savings (MWh)	65.73	65.73	65.73	65.73	65.73	328.66
		Summer Demand Reduction (MW)	0.0101	0.0101	0.0101	0.0101	0.0101	0.0506
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	115	115	115	115	115	575
Central Air Conditioner SEER 17.5 / SEER2 16.3	2.2.1	Energy Savings (MWh)	20.86	20.86	20.86	20.86	20.86	104.28
		Summer Demand Reduction (MW)	0.0145	0.0145	0.0145	0.0145	0.0145	0.0724
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	90	90	90	90	90	448
Ductless Mini-Split ENERGY STAR Cold Climate rated	2.2.1	Energy Savings (MWh)	203.58	203.58	203.58	203.58	203.58	1,017.88

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0145	0.0145	0.0145	0.0145	0.0145	0.0725
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	85	85	85	85	85	424
Duct Sealing & Duct Insulation	2.2.10	Energy Savings (MWh)	1.11	-	-	-	-	1.11
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Projected Participation	1	-	-	-	-	1
Air Handler Filter Whistles	2.2.11	Energy Savings (MWh)	0.01	-	-	-	-	0.01
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Connected Thermostat	2.2.12	Energy Savings (MWh)	177.38	177.38	177.38	177.38	177.38	886.90
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	310	310	310	310	310	1,551
Energy Star Certified Smart Thermostat	2.2.12	Energy Savings (MWh)	1,018.24	1,018.24	1,018.24	1,018.24	1,018.24	5,091.20
		Summer Demand Reduction (MW)	0.1186	0.1186	0.1186	0.1186	0.1186	0.5931
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1,540	1,540	1,540	1,540	1,540	7,702
Furnace Maintenance	2.2.13	Energy Savings (MWh)	0.01	-	-	-	-	0.01
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Energy Star Bathroom Exhaust Fan	2.2.14	Energy Savings (MWh)	0.38	0.38	0.38	0.38	0.38	1.88
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	16	16	16	16	16	79
Air Conditioner <5.4 Tons	2.2.2	Energy Savings (MWh)	105.77	105.77	105.77	105.77	105.77	528.84
		Summer Demand Reduction (MW)	0.0218	0.0218	0.0218	0.0218	0.0218	0.1092
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	275	275	275	275	275	1,377
Heat Pump <5.4 Tons	2.2.2	Energy Savings (MWh)	433.54	433.54	433.54	433.54	433.54	2,167.71
		Summer Demand Reduction (MW)	0.0104	0.0104	0.0104	0.0104	0.0104	0.0518
		Winter Demand Reduction (MW)	0.0238	0.0238	0.0238	0.0238	0.0238	0.1190
		Projected Participation	551	551	551	551	551	2,754
Mini/Multi Split Air Conditioner	2.2.3	Energy Savings (MWh)	382.91	382.91	382.91	382.91	382.91	1,914.54
		Summer Demand Reduction (MW)	0.0792	0.0792	0.0792	0.0792	0.0792	0.3959
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	960	960	960	960	960	4,798
Mini/Multi Split Heat Pump	2.2.3	Energy Savings (MWh)	2,710.32	2,710.32	2,710.32	2,710.32	2,710.32	13,551.59
		Summer Demand Reduction (MW)	0.0240	0.0240	0.0240	0.0240	0.0240	0.1200
		Winter Demand Reduction (MW)	0.1716	0.1716	0.1716	0.1716	0.1716	0.8580
		Projected Participation	1,919	1,919	1,919	1,919	1,919	9,597
Furnace Circulation Fan - High Efficiency (ECM - Variable Speed)	2.2.4	Energy Savings (MWh)	4.48	4.48	4.48	4.48	4.48	22.38
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	24	24	24	24	24	120
GSHP Desuperheaters	2.2.5	Energy Savings (MWh)	0.50	-	-	-	-	0.50
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Air Conditioner & Heat Pump Maintenance	2.2.6	Energy Savings (MWh)	0.49	-	-	-	-	0.49
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	2	-	-	-	-	2
Room Air Conditioner	2.2.7	Energy Savings (MWh)	0.99	0.99	0.99	0.99	0.99	4.97
		Summer Demand Reduction (MW)	0.0024	0.0024	0.0024	0.0024	0.0024	0.0118
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	16	16	16	16	16	79
Room A/C – Recycling	2.2.8	Energy Savings (MWh)	107.53	107.53	107.53	107.53	107.53	537.64
		Summer Demand Reduction (MW)	0.1318	0.1318	0.1318	0.1318	0.1318	0.6591
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	187	187	187	187	187	934
Room AC Replacement	2.2.8	Energy Savings (MWh)	0.81	0.81	0.81	0.81	0.81	4.03
		Summer Demand Reduction (MW)	0.0022	0.0022	0.0022	0.0022	0.0022	0.0109
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	37	37	37	37	37	185
Window Heat Pump	2.2.9	Energy Savings (MWh)	1.96	-	-	-	-	1.96
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0006	-	-	-	-	0.0006
		Projected Participation	1	-	-	-	-	1
Heat Pump Water Heater	2.3.1	Energy Savings (MWh)	679.18	679.18	679.18	679.18	679.18	3,395.92
		Summer Demand Reduction (MW)	0.0669	0.0669	0.0669	0.0669	0.0669	0.3347
		Winter Demand Reduction (MW)	0.1166	0.1166	0.1166	0.1166	0.1166	0.5830
		Projected Participation	359	359	359	359	359	1,796
Smart Water Heater Controls	2.3.10	Energy Savings (MWh)	0.03	-	-	-	-	0.03
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Solar Water Heaters	2.3.2	Energy Savings (MWh)	1.88	-	-	-	-	1.88
		Summer Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Winter Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Projected Participation	1	-	-	-	-	1
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh)	0.09	-	-	-	-	0.09
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh)	0.06	-	-	-	-	0.06
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Pipe Insulation	2.3.5	Energy Savings (MWh)	17.57	17.57	17.57	17.57	17.57	87.86

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	207	207	207	207	207	1,034
Water Heater Pipe Insulation	2.3.5	Energy Savings (MWh)	11.70	11.70	11.70	11.70	11.70	58.49
		Summer Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0048
		Winter Demand Reduction (MW)	0.0018	0.0018	0.0018	0.0018	0.0018	0.0089
		Projected Participation	154	154	154	154	154	771
Low-Flow Faucet Aerator	2.3.6	Energy Savings (MWh)	105.59	105.59	105.59	105.59	105.59	527.96
		Summer Demand Reduction (MW)	0.0144	0.0144	0.0144	0.0144	0.0144	0.0722
		Winter Demand Reduction (MW)	0.0267	0.0267	0.0267	0.0267	0.0267	0.1333
		Projected Participation	721	721	721	721	721	3,607
Low-Flow Showerhead	2.3.7	Energy Savings (MWh)	57.22	57.22	57.22	57.22	57.22	286.10
		Summer Demand Reduction (MW)	0.0046	0.0046	0.0046	0.0046	0.0046	0.0230
		Winter Demand Reduction (MW)	0.0085	0.0085	0.0085	0.0085	0.0085	0.0424
		Projected Participation	361	361	361	361	361	1,805
Thermostatic Shower Restriction Valves	2.3.8	Energy Savings (MWh)	2.25	2.25	2.25	2.25	2.25	11.26
		Summer Demand Reduction (MW)	0.0002	0.0002	0.0002	0.0002	0.0002	0.0012
		Winter Demand Reduction (MW)	0.0004	0.0004	0.0004	0.0004	0.0004	0.0021
		Projected Participation	77	77	77	77	77	387
Thermostatic Showerhead	2.3.8	Energy Savings (MWh)	2.99	2.99	2.99	2.99	2.99	14.94
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	104	104	104	104	104	519

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Drain Water Heat Recovery Units	2.3.9	Energy Savings (MWh)	0.23	-	-	-	-	0.23
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Freezer	2.4.1	Energy Savings (MWh)	95.24	95.24	95.24	95.24	95.24	476.19
		Summer Demand Reduction (MW)	0.0132	0.0132	0.0132	0.0132	0.0132	0.0660
		Winter Demand Reduction (MW)	0.0117	0.0117	0.0117	0.0117	0.0117	0.0583
		Projected Participation	187	187	187	187	187	934
Energy Star Refrigerator	2.4.1	Energy Savings (MWh)	923.72	923.72	923.72	923.72	923.72	4,618.60
		Summer Demand Reduction (MW)	0.1250	0.1250	0.1250	0.1250	0.1250	0.6252
		Winter Demand Reduction (MW)	0.1104	0.1104	0.1104	0.1104	0.1104	0.5521
		Projected Participation	1,105	1,105	1,105	1,105	1,105	5,525
Energy Star Dishwashers	2.4.10	Energy Savings (MWh)	0.47	0.47	0.47	0.47	0.47	2.33
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0004
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0003
		Projected Participation	16	16	16	16	16	79
Energy Star Dehumidifiers	2.4.11	Energy Savings (MWh)	21.75	21.75	21.75	21.75	21.75	108.73
		Summer Demand Reduction (MW)	0.0041	0.0041	0.0041	0.0041	0.0041	0.0204
		Winter Demand Reduction (MW)	0.0036	0.0036	0.0036	0.0036	0.0036	0.0180
		Projected Participation	154	154	154	154	154	771
Dehumidifier – Recycling	2.4.12	Energy Savings (MWh)	99.32	99.32	99.32	99.32	99.32	496.58
		Summer Demand Reduction (MW)	0.0350	0.0350	0.0350	0.0350	0.0350	0.1750
		Winter Demand Reduction (MW)	0.0309	0.0309	0.0309	0.0309	0.0309	0.1545

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	140	140	140	140	140	700
ENERGY STAR Ceiling Fans	2.4.13	Energy Savings (MWh)	0.03	-	-	-	-	0.03
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Air Purifiers	2.4.14	Energy Savings (MWh)	27.16	27.16	27.16	27.16	27.16	135.80
		Summer Demand Reduction (MW)	0.0026	0.0026	0.0026	0.0026	0.0026	0.0128
		Winter Demand Reduction (MW)	0.0023	0.0023	0.0023	0.0023	0.0023	0.0113
		Projected Participation	154	154	154	154	154	771
Energy Star Freezer	2.4.2	Energy Savings (MWh)	0.22	0.22	0.22	0.22	0.22	1.10
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0001
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0001
		Projected Participation	16	16	16	16	16	79
Refrigerator / Freezer Recycling with and without Replacement	2.4.3	Energy Savings (MWh)	121.55	121.55	121.55	121.55	121.55	607.76
		Summer Demand Reduction (MW)	0.0202	0.0202	0.0202	0.0202	0.0202	0.1011
		Winter Demand Reduction (MW)	0.0179	0.0179	0.0179	0.0179	0.0179	0.0893
		Projected Participation	285	285	285	285	285	1,423
Low-Capacity Refrigerator / Freezer Recycling without Replacement	2.4.4	Energy Savings (MWh)	0.45	-	-	-	-	0.45
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	2	-	-	-	-	2
ENERGY STAR Coolers	2.4.5	Energy Savings (MWh)	0.04	-	-	-	-	0.04
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Cooler Recycling with and without Replacement	2.4.6	Energy Savings (MWh)	0.31	-	-	-	-	0.31
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	2	-	-	-	-	2
Residential Induction Cooktop	2.4.7	Energy Savings (MWh)	0.01	-	-	-	-	0.01
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Clothes Washer	2.4.8	Energy Savings (MWh)	0.09	0.09	0.09	0.09	0.09	0.44
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0001
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0001
		Projected Participation	16	16	16	16	16	79
Energy Star Clothes Dryer	2.4.9	Energy Savings (MWh)	0.32	0.32	0.32	0.32	0.32	1.60
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Projected Participation	16	16	16	16	16	79
Advanced Power Strips	2.5.1	Energy Savings (MWh)	287.86	287.86	287.86	287.86	287.86	1,439.32
		Summer Demand Reduction (MW)	0.0384	0.0384	0.0384	0.0384	0.0384	0.1918
		Winter Demand Reduction (MW)	0.0494	0.0494	0.0494	0.0494	0.0494	0.2470
		Projected Participation	2,784	2,784	2,784	2,784	2,784	13,918
Air Sealing	2.6.1	Energy Savings (MWh)	36.94	36.94	36.94	36.94	36.94	184.70

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	35	35	35	35	35	174
Caulking	2.6.2	Energy Savings (MWh)	0.44	0.44	0.44	0.44	0.44	2.22
		Summer Demand Reduction (MW)	0.0002	0.0002	0.0002	0.0002	0.0002	0.0012
		Winter Demand Reduction (MW)	0.0003	0.0003	0.0003	0.0003	0.0003	0.0014
		Projected Participation	77	77	77	77	77	387
Outlet Gaskets	2.6.2	Energy Savings (MWh)	1.05	1.05	1.05	1.05	1.05	5.26
		Summer Demand Reduction (MW)	0.0006	0.0006	0.0006	0.0006	0.0006	0.0028
		Winter Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0033
		Projected Participation	308	308	308	308	308	1,540
Weather Stripping	2.6.2	Energy Savings (MWh)	17.70	17.70	17.70	17.70	17.70	88.49
		Summer Demand Reduction (MW)	0.0003	0.0003	0.0003	0.0003	0.0003	0.0014
		Winter Demand Reduction (MW)	0.0003	0.0003	0.0003	0.0003	0.0003	0.0017
		Projected Participation	361	361	361	361	361	1,805
Insulation, Basement Wall	2.6.3	Energy Savings (MWh)	54.61	54.61	54.61	54.61	54.61	273.05
		Summer Demand Reduction (MW)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0073
		Winter Demand Reduction (MW)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0087
		Projected Participation	40	40	40	40	40	200
Insulation, Ceiling	2.6.3	Energy Savings (MWh)	165.51	165.51	165.51	165.51	165.51	827.55
		Summer Demand Reduction (MW)	0.0072	0.0072	0.0072	0.0072	0.0072	0.0361
		Winter Demand Reduction (MW)	0.0086	0.0086	0.0086	0.0086	0.0086	0.0432
		Projected Participation	168	168	168	168	168	840

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Insulation, Exterior Wall	2.6.3	Energy Savings (MWh)	24.71	24.71	24.71	24.71	24.71	123.57
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0045
		Projected Participation	16	16	16	16	16	79
Insulation, Floor	2.6.3	Energy Savings (MWh)	12.51	12.51	12.51	12.51	12.51	62.56
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0044
		Projected Participation	8	8	8	8	8	40
Basement or Crawl Space Wall Insulation	2.6.4	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.01
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	20	20	20	20	20	100
ENERGY STAR Windows	2.6.5	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.01
		Summer Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0051
		Winter Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0052
		Projected Participation	1	1	1	1	1	6
Residential New Construction	2.7.1	Energy Savings (MWh)	4.47	-	-	-	-	4.47
		Summer Demand Reduction (MW)	0.0006	-	-	-	-	0.0006
		Winter Demand Reduction (MW)	0.0009	-	-	-	-	0.0009
		Projected Participation	1	-	-	-	-	1
ENERGY STAR Manufactured Homes	2.7.2	Energy Savings (MWh)	18.86	-	-	-	-	18.86
		Summer Demand Reduction (MW)	0.0026	-	-	-	-	0.0026
		Winter Demand Reduction (MW)	0.0037	-	-	-	-	0.0037

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1	-	-	-	-	1
Home Energy Reports	2.7.3	Energy Savings (MWh)	34,400.00	-	-	-	-	34,400.00
		Summer Demand Reduction (MW)	7.9400	-	-	-	-	7.9400
		Winter Demand Reduction (MW)	7.9400	-	-	-	-	7.9400
		Projected Participation	2	-	-	-	-	2
ENERGY STAR Pool Pumps	2.8.1	Energy Savings (MWh)	0.11	-	-	-	-	0.11
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Single Speed Pool Pump Replacement	2.8.2	Energy Savings (MWh)	1.17	-	-	-	-	1.17
		Summer Demand Reduction (MW)	0.0005	-	-	-	-	0.0005
		Winter Demand Reduction (MW)	0.0006	-	-	-	-	0.0006
		Projected Participation	1	-	-	-	-	1
Photovoltaic (PV) Solar Generation	2.8.3	Energy Savings (MWh)	7.33	-	-	-	-	7.33
		Summer Demand Reduction (MW)	0.0023	-	-	-	-	0.0023
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1
Direct Load Control & Behavior-Based Demand Response Programs	2.9.1	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0555	0.0555	0.0555	0.0555	0.0555	0.2776
		Winter Demand Reduction (MW)	0.0694	0.0694	0.0694	0.0694	0.0694	0.3470
		Projected Participation	154	154	154	154	154	771
Managed EV Charging, 3 - 9 PM	2.9.1	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.3373	0.3373	0.3373	0.3373	0.3373	1.6863

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.2480	0.2480	0.2480	0.2480	0.2480	1.2399
		Projected Participation	992	992	992	992	992	4,960
Optimize Energy Star Thermostats	2.9.1	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0679	0.0679	0.0679	0.0679	0.0679	0.3393
		Winter Demand Reduction (MW)	0.2221	0.2221	0.2221	0.2221	0.2221	1.1105
		Projected Participation	62	62	62	62	62	308
Smart Energy Service Panel	2.9.1	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Winter Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Projected Participation	1	-	-	-	-	1
High Output Linear LED T5/T8 Fixture	3.1.1	Energy Savings (MWh)	32.50	32.50	32.50	32.50	32.50	162.49
		Summer Demand Reduction (MW)	0.0090	0.0090	0.0090	0.0090	0.0090	0.0448
		Winter Demand Reduction (MW)	0.0060	0.0060	0.0060	0.0060	0.0060	0.0301
		Projected Participation	78	78	78	78	78	388
LED 2' Linear Replacement Lamp	3.1.1	Energy Savings (MWh)	74.76	74.76	74.76	74.76	74.76	373.80
		Summer Demand Reduction (MW)	0.0147	0.0147	0.0147	0.0147	0.0147	0.0736
		Winter Demand Reduction (MW)	0.0099	0.0099	0.0099	0.0099	0.0099	0.0495
		Projected Participation	1,297	1,297	1,297	1,297	1,297	6,483
LED 3' Linear Replacement Lamp	3.1.1	Energy Savings (MWh)	48.98	48.98	48.98	48.98	48.98	244.88
		Summer Demand Reduction (MW)	0.0107	0.0107	0.0107	0.0107	0.0107	0.0536
		Winter Demand Reduction (MW)	0.0072	0.0072	0.0072	0.0072	0.0072	0.0361
		Projected Participation	923	923	923	923	923	4,614
LED 4' Interior Linear Strip Fixture or Retrofit Kit	3.1.1	Energy Savings (MWh)	460.05	460.05	460.05	460.05	460.05	2,300.26

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0979	0.0979	0.0979	0.0979	0.0979	0.4895
		Winter Demand Reduction (MW)	0.0658	0.0658	0.0658	0.0658	0.0658	0.3291
		Projected Participation	3,308	3,308	3,308	3,308	3,308	16,542
LED 4' Linear Replacement Lamp	3.1.1	Energy Savings (MWh)	2,114.10	2,114.10	2,114.10	2,114.10	2,114.10	10,570.49
		Summer Demand Reduction (MW)	0.5166	0.5166	0.5166	0.5166	0.5166	2.5828
		Winter Demand Reduction (MW)	0.3473	0.3473	0.3473	0.3473	0.3473	1.7367
		Projected Participation	15,843	15,843	15,843	15,843	15,843	79,217
LED 8' Interior Linear Strip Fixture or Retrofit Kit	3.1.1	Energy Savings (MWh)	417.81	417.81	417.81	417.81	417.81	2,089.06
		Summer Demand Reduction (MW)	0.0962	0.0962	0.0962	0.0962	0.0962	0.4809
		Winter Demand Reduction (MW)	0.0647	0.0647	0.0647	0.0647	0.0647	0.3234
		Projected Participation	1,169	1,169	1,169	1,169	1,169	5,846
LED 8' Linear Replacement Lamp	3.1.1	Energy Savings (MWh)	112.51	112.51	112.51	112.51	112.51	562.54
		Summer Demand Reduction (MW)	0.0275	0.0275	0.0275	0.0275	0.0275	0.1374
		Winter Demand Reduction (MW)	0.0185	0.0185	0.0185	0.0185	0.0185	0.0924
		Projected Participation	711	711	711	711	711	3,555
LED Downlight with Integrated Occupancy Sensor	3.1.1	Energy Savings (MWh)	0.40	0.40	0.40	0.40	0.40	1.98
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0004
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Projected Participation	11	11	11	11	11	53
LED Downlight with Integrated Occupancy and Daylight Sensor	3.1.1	Energy Savings (MWh)	0.93	0.93	0.93	0.93	0.93	4.66
		Summer Demand Reduction (MW)	0.0002	0.0002	0.0002	0.0002	0.0002	0.0009
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0006
		Projected Participation	22	22	22	22	22	108

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
LED Exterior Area Lighting Fixture	3.1.1	Energy Savings (MWh)	1,813.81	1,813.81	1,813.81	1,813.81	1,813.81	9,069.04
		Summer Demand Reduction (MW)	0.0842	0.0842	0.0842	0.0842	0.0842	0.4210
		Winter Demand Reduction (MW)	0.0566	0.0566	0.0566	0.0566	0.0566	0.2831
		Projected Participation	1,505	1,505	1,505	1,505	1,505	7,526
LED Interior 1' X 2'	3.1.1	Energy Savings (MWh)	3.14	3.14	3.14	3.14	3.14	15.71
		Summer Demand Reduction (MW)	0.0005	0.0005	0.0005	0.0005	0.0005	0.0024
		Winter Demand Reduction (MW)	0.0003	0.0003	0.0003	0.0003	0.0003	0.0016
		Projected Participation	17	17	17	17	17	85
LED Interior 1' X 4'	3.1.1	Energy Savings (MWh)	191.27	191.27	191.27	191.27	191.27	956.34
		Summer Demand Reduction (MW)	0.0339	0.0339	0.0339	0.0339	0.0339	0.1695
		Winter Demand Reduction (MW)	0.0228	0.0228	0.0228	0.0228	0.0228	0.1139
		Projected Participation	681	681	681	681	681	3,403
LED Interior 2' X 2'	3.1.1	Energy Savings (MWh)	735.94	735.94	735.94	735.94	735.94	3,679.71
		Summer Demand Reduction (MW)	0.1545	0.1545	0.1545	0.1545	0.1545	0.7726
		Winter Demand Reduction (MW)	0.1039	0.1039	0.1039	0.1039	0.1039	0.5195
		Projected Participation	3,767	3,767	3,767	3,767	3,767	18,835
LED Interior 2' X 4'	3.1.1	Energy Savings (MWh)	1,834.33	1,834.33	1,834.33	1,834.33	1,834.33	9,171.63
		Summer Demand Reduction (MW)	0.4035	0.4035	0.4035	0.4035	0.4035	2.0173
		Winter Demand Reduction (MW)	0.2713	0.2713	0.2713	0.2713	0.2713	1.3565
		Projected Participation	6,984	6,984	6,984	6,984	6,984	34,920
LED Interior High-Bay Fixture	3.1.1	Energy Savings (MWh)	1,504.18	1,504.18	1,504.18	1,504.18	1,504.18	7,520.91
		Summer Demand Reduction (MW)	0.3573	0.3573	0.3573	0.3573	0.3573	1.7866
		Winter Demand Reduction (MW)	0.2701	0.2701	0.2701	0.2701	0.2701	1.3503

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1,639	1,639	1,639	1,639	1,639	8,195
Lighting Retrofits, Custom	3.1.1	Energy Savings (MWh)	798.00	798.00	798.00	798.00	798.00	3,989.98
		Summer Demand Reduction (MW)	0.1359	0.1359	0.1359	0.1359	0.1359	0.6795
		Winter Demand Reduction (MW)	0.1052	0.1052	0.1052	0.1052	0.1052	0.5261
		Projected Participation	968	968	968	968	968	4,838
New Construction Lighting	3.1.2	Energy Savings (MWh)	0.00	-	-	-	-	0.00
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
LED Canopy Luminaire and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	2.36	2.36	2.36	2.36	2.36	11.78
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0003
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Projected Participation	4	4	4	4	4	20
LED Downlight with NLC/LLLC	3.1.3	Energy Savings (MWh)	0.51	0.51	0.51	0.51	0.51	2.54
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0005
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0003
		Projected Participation	11	11	11	11	11	53
LED Exterior Luminaire and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	47.70	47.70	47.70	47.70	47.70	238.52
		Summer Demand Reduction (MW)	0.0013	0.0013	0.0013	0.0013	0.0013	0.0067
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0045
		Projected Participation	53	53	53	53	53	267
LED High-Bay Luminaire and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	1,000.13	1,000.13	1,000.13	1,000.13	1,000.13	5,000.67
		Summer Demand Reduction (MW)	0.1922	0.1922	0.1922	0.1922	0.1922	0.9608

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.1292	0.1292	0.1292	0.1292	0.1292	0.6461
		Projected Participation	599	599	599	599	599	2,994
LED Low-Bay Luminaire and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	127.30	127.30	127.30	127.30	127.30	636.49
		Summer Demand Reduction (MW)	0.0250	0.0250	0.0250	0.0250	0.0250	0.1252
		Winter Demand Reduction (MW)	0.0168	0.0168	0.0168	0.0168	0.0168	0.0842
		Projected Participation	556	556	556	556	556	2,782
LED Parking Garage Lighting with NLC/LLLC	3.1.3	Energy Savings (MWh)	14.93	14.93	14.93	14.93	14.93	74.64
		Summer Demand Reduction (MW)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0084
		Winter Demand Reduction (MW)	0.0011	0.0011	0.0011	0.0011	0.0011	0.0057
		Projected Participation	7	7	7	7	7	33
LED Stairwell and Passageway Luminaire with NLC/LLLC	3.1.3	Energy Savings (MWh)	1.50	1.50	1.50	1.50	1.50	7.48
		Summer Demand Reduction (MW)	0.0002	0.0002	0.0002	0.0002	0.0002	0.0009
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0006
		Projected Participation	3	3	3	3	3	14
LED Surface and Suspended Linear Luminaire and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	131.27	131.27	131.27	131.27	131.27	656.33
		Summer Demand Reduction (MW)	0.0267	0.0267	0.0267	0.0267	0.0267	0.1337
		Winter Demand Reduction (MW)	0.0180	0.0180	0.0180	0.0180	0.0180	0.0899
		Projected Participation	947	947	947	947	947	4,736
LED Troffer and Retrofit Kit with NLC/LLLC	3.1.3	Energy Savings (MWh)	126.82	126.82	126.82	126.82	126.82	634.11
		Summer Demand Reduction (MW)	0.0256	0.0256	0.0256	0.0256	0.0256	0.1281
		Winter Demand Reduction (MW)	0.0172	0.0172	0.0172	0.0172	0.0172	0.0861
		Projected Participation	1,085	1,085	1,085	1,085	1,085	5,424
Lighting Controls	3.1.3	Energy Savings (MWh)	485.68	485.68	485.68	485.68	485.68	2,428.40

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0828	0.0828	0.0828	0.0828	0.0828	0.4138
		Winter Demand Reduction (MW)	0.0641	0.0641	0.0641	0.0641	0.0641	0.3204
		Projected Participation	779	779	779	779	779	3,897
Occupancy sensor, ceiling or wall mounted	3.1.3	Energy Savings (MWh)	34.39	34.39	34.39	34.39	34.39	171.97
		Summer Demand Reduction (MW)	0.0090	0.0090	0.0090	0.0090	0.0090	0.0452
		Winter Demand Reduction (MW)	0.0061	0.0061	0.0061	0.0061	0.0061	0.0304
		Projected Participation	372	372	372	372	372	1,859
Occupancy sensor, high bay fixture-integrated	3.1.3	Energy Savings (MWh)	99.12	99.12	99.12	99.12	99.12	495.62
		Summer Demand Reduction (MW)	0.0225	0.0225	0.0225	0.0225	0.0225	0.1127
		Winter Demand Reduction (MW)	0.0152	0.0152	0.0152	0.0152	0.0152	0.0758
		Projected Participation	573	573	573	573	573	2,864
Occupancy sensor, networked lighting controls	3.1.3	Energy Savings (MWh)	15.81	15.81	15.81	15.81	15.81	79.05
		Summer Demand Reduction (MW)	0.0045	0.0045	0.0045	0.0045	0.0045	0.0226
		Winter Demand Reduction (MW)	0.0030	0.0030	0.0030	0.0030	0.0030	0.0152
		Projected Participation	90	90	90	90	90	452
LED Exit Sign	3.1.4	Energy Savings (MWh)	0.79	-	-	-	-	0.79
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	4	-	-	-	-	4
LED Refrigeration Display Case Lighting	3.1.5	Energy Savings (MWh)	0.15	-	-	-	-	0.15
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
LED Canopy Luminaire and Retrofit Kit with Integrated Motion Sensor	3.1.6	Energy Savings (MWh)	7.05	7.05	7.05	7.05	7.05	35.25
		Summer Demand Reduction (MW)	0.0002	0.0002	0.0002	0.0002	0.0002	0.0009
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0006
		Projected Participation	15	15	15	15	15	75
LED Exterior Luminaire and Retrofit Kit with Integrated Motion Sensor	3.1.6	Energy Savings (MWh)	392.83	392.83	392.83	392.83	392.83	1,964.16
		Summer Demand Reduction (MW)	0.0109	0.0109	0.0109	0.0109	0.0109	0.0547
		Winter Demand Reduction (MW)	0.0073	0.0073	0.0073	0.0073	0.0073	0.0367
		Projected Participation	480	480	480	480	480	2,401
LED High-Bay Luminaire and Retrofit Kit with Integrated Occupancy Sensor	3.1.6	Energy Savings (MWh)	1,817.78	1,817.78	1,817.78	1,817.78	1,817.78	9,088.89
		Summer Demand Reduction (MW)	0.3496	0.3496	0.3496	0.3496	0.3496	1.7481
		Winter Demand Reduction (MW)	0.2351	0.2351	0.2351	0.2351	0.2351	1.1754
		Projected Participation	1,197	1,197	1,197	1,197	1,197	5,987
LED High-Bay Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	3.1.6	Energy Savings (MWh)	1,920.25	1,920.25	1,920.25	1,920.25	1,920.25	9,601.24
		Summer Demand Reduction (MW)	0.3691	0.3691	0.3691	0.3691	0.3691	1.8455
		Winter Demand Reduction (MW)	0.2482	0.2482	0.2482	0.2482	0.2482	1.2410
		Projected Participation	1,197	1,197	1,197	1,197	1,197	5,987
LED Low-Bay Luminaire and Retrofit Kit with Integrated Occupancy Sensor	3.1.6	Energy Savings (MWh)	209.67	209.67	209.67	209.67	209.67	1,048.33
		Summer Demand Reduction (MW)	0.0415	0.0415	0.0415	0.0415	0.0415	0.2077
		Winter Demand Reduction (MW)	0.0279	0.0279	0.0279	0.0279	0.0279	0.1397
		Projected Participation	1,113	1,113	1,113	1,113	1,113	5,564
LED Low-Bay Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	3.1.6	Energy Savings (MWh)	234.85	234.85	234.85	234.85	234.85	1,174.25
		Summer Demand Reduction (MW)	0.0463	0.0463	0.0463	0.0463	0.0463	0.2317
		Winter Demand Reduction (MW)	0.0312	0.0312	0.0312	0.0312	0.0312	0.1558

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1,113	1,113	1,113	1,113	1,113	5,564
LED Parking Garage Lighting with Integrated Motion Sensor	3.1.6	Energy Savings (MWh)	102.98	102.98	102.98	102.98	102.98	514.92
		Summer Demand Reduction (MW)	0.0116	0.0116	0.0116	0.0116	0.0116	0.0581
		Winter Demand Reduction (MW)	0.0078	0.0078	0.0078	0.0078	0.0078	0.0391
		Projected Participation	51	51	51	51	51	253
LED Parking Garage Lighting with Integrated Motion and Daylight Sensor	3.1.6	Energy Savings (MWh)	57.25	57.25	57.25	57.25	57.25	286.27
		Summer Demand Reduction (MW)	0.0065	0.0065	0.0065	0.0065	0.0065	0.0323
		Winter Demand Reduction (MW)	0.0043	0.0043	0.0043	0.0043	0.0043	0.0217
		Projected Participation	27	27	27	27	27	135
LED Stairwell and Passageway Luminaire with Integrated Motion Sensor	3.1.6	Energy Savings (MWh)	12.04	12.04	12.04	12.04	12.04	60.18
		Summer Demand Reduction (MW)	0.0014	0.0014	0.0014	0.0014	0.0014	0.0069
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0046
		Projected Participation	27	27	27	27	27	136
LED Surface and Suspended Linear Luminaire and Retrofit Kit with Integrated Occupancy Sensor	3.1.6	Energy Savings (MWh)	25.95	25.95	25.95	25.95	25.95	129.75
		Summer Demand Reduction (MW)	0.0052	0.0052	0.0052	0.0052	0.0052	0.0262
		Winter Demand Reduction (MW)	0.0035	0.0035	0.0035	0.0035	0.0035	0.0176
		Projected Participation	238	238	238	238	238	1,189
LED Surface and Suspended Linear Luminaire and Retrofit Kit with Integrated Occupancy and Daylight Sensor	3.1.6	Energy Savings (MWh)	148.91	148.91	148.91	148.91	148.91	744.53
		Summer Demand Reduction (MW)	0.0302	0.0302	0.0302	0.0302	0.0302	0.1511
		Winter Demand Reduction (MW)	0.0203	0.0203	0.0203	0.0203	0.0203	0.1016
		Projected Participation	1,185	1,185	1,185	1,185	1,185	5,924
LED Troffer and Retrofit Kit with Integrated Occupancy Sensor	3.1.6	Energy Savings (MWh)	24.49	24.49	24.49	24.49	24.49	122.45
		Summer Demand Reduction (MW)	0.0049	0.0049	0.0049	0.0049	0.0049	0.0244

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0033	0.0033	0.0033	0.0033	0.0033	0.0164
		Projected Participation	271	271	271	271	271	1,356
LED Troffer and Retrofit Kit with Integrated Occupancy and Daylight Sensor	3.1.6	Energy Savings (MWh)	142.66	142.66	142.66	142.66	142.66	713.32
		Summer Demand Reduction (MW)	0.0287	0.0287	0.0287	0.0287	0.0287	0.1435
		Winter Demand Reduction (MW)	0.0193	0.0193	0.0193	0.0193	0.0193	0.0965
		Projected Participation	1,356	1,356	1,356	1,356	1,356	6,781
Indoor Horticultural Lighting	3.1.7	Energy Savings (MWh)	2.84	-	-	-	-	2.84
		Summer Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Winter Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Projected Participation	1	-	-	-	-	1
Cycling Refrigerated Thermal Mass Dryer	3.10.1	Energy Savings (MWh)	24.00	24.00	24.00	24.00	24.00	120.02
		Summer Demand Reduction (MW)	0.0057	0.0057	0.0057	0.0057	0.0057	0.0287
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	12	12	12	12	12	60
Air-Entraining Air Nozzle	3.10.2	Energy Savings (MWh)	0.31	-	-	-	-	0.31
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1
No-loss Condensate Drain	3.10.3	Energy Savings (MWh)	10.15	10.15	10.15	10.15	10.15	50.74
		Summer Demand Reduction (MW)	0.0025	0.0025	0.0025	0.0025	0.0025	0.0123
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	154	154	154	154	154	769
Air Receiver Tanks for Load, No Load Compressors	3.10.4	Energy Savings (MWh)	1,300.20	1,300.20	1,300.20	1,300.20	1,300.20	6,500.99

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.2689	0.2689	0.2689	0.2689	0.2689	1.3443
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	70	70	70	70	70	348
Variable-Speed Drive Air Compressor	3.10.5	Energy Savings (MWh)	572.71	572.71	572.71	572.71	572.71	2,863.53
		Summer Demand Reduction (MW)	0.0697	0.0697	0.0697	0.0697	0.0697	0.3487
		Winter Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0041
		Projected Participation	58	58	58	58	58	290
Compressed Air Controller	3.10.6	Energy Savings (MWh)	44.93	44.93	44.93	44.93	44.93	224.64
		Summer Demand Reduction (MW)	0.0109	0.0109	0.0109	0.0109	0.0109	0.0543
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0004
		Projected Participation	8	8	8	8	8	41
Low Pressure Drop Filter for Compressed Air Systems	3.10.7	Energy Savings (MWh)	57.28	57.28	57.28	57.28	57.28	286.38
		Summer Demand Reduction (MW)	0.0069	0.0069	0.0069	0.0069	0.0069	0.0346
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	154	154	154	154	154	769
Compressed Air Mist Eliminators	3.10.8	Energy Savings (MWh)	0.02	-	-	-	-	0.02
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
High Efficiency Transformer	3.11.1	Energy Savings (MWh)	0.57	-	-	-	-	0.57
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Engine Block Heater Timer	3.11.2	Energy Savings (MWh)	0.47	-	-	-	-	0.47
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
High Frequency Battery Chargers	3.11.3	Energy Savings (MWh)	0.53	-	-	-	-	0.53
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Uninterruptible Power Supply (UPS)	3.11.4	Energy Savings (MWh)	0.01	-	-	-	-	0.01
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Building Operator Certification	3.11.5	Energy Savings (MWh)	146.04	146.04	146.04	146.04	146.04	730.21
		Summer Demand Reduction (MW)	0.0381	0.0381	0.0381	0.0381	0.0381	0.1904
		Winter Demand Reduction (MW)	0.0275	0.0275	0.0275	0.0275	0.0275	0.1375
		Projected Participation	29	29	29	29	29	146
Photovoltaic (PV) Solar Generation	3.11.6	Energy Savings (MWh)	3,803.63	3,803.63	3,803.63	3,803.63	3,803.63	19,018.13
		Summer Demand Reduction (MW)	0.9079	0.9079	0.9079	0.9079	0.9079	4.5397
		Winter Demand Reduction (MW)	0.0502	0.0502	0.0502	0.0502	0.0502	0.2508
		Projected Participation	5	5	5	5	5	27
Load Curtailment for Commercial and Industrial Programs	3.12.1	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	2.1191	-	-	-	-	2.1191
		Winter Demand Reduction (MW)	2.1191	-	-	-	-	2.1191

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1	-	-	-	-	1
Packaged Terminal AC or PTHP 12.0 EER	3.2.1	Energy Savings (MWh)	2.38	2.38	2.38	2.38	2.38	11.89
		Summer Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0043
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	14	14	14	14	14	68
Unitary HVAC 135-240k AC unit, Min 11.5 EER 13 IEER	3.2.1	Energy Savings (MWh)	4.69	4.69	4.69	4.69	4.69	23.43
		Summer Demand Reduction (MW)	0.0047	0.0047	0.0047	0.0047	0.0047	0.0235
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	19	19	19	19	19	95
Unitary HVAC 65-135k AC unit, Min 11.5 EER 13.2 IEER	3.2.1	Energy Savings (MWh)	1.45	1.45	1.45	1.45	1.45	7.26
		Summer Demand Reduction (MW)	0.0013	0.0013	0.0013	0.0013	0.0013	0.0067
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	9	9	9	9	9	44
Controls: Guest Room Occupancy Sensor	3.2.10	Energy Savings (MWh)	0.34	-	-	-	-	0.34
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Controls: Economizer	3.2.11	Energy Savings (MWh)	2.66	-	-	-	-	2.66
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Computer Room Air Conditioner	3.2.12	Energy Savings (MWh)	0.07	-	-	-	-	0.07
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	3.2.13	Energy Savings (MWh)	1.17	-	-	-	-	1.17
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1
Computer Room Air Conditioner/Handler VSD on AC Fan Motors	3.2.14	Energy Savings (MWh)	1.44	-	-	-	-	1.44
		Summer Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Winter Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Projected Participation	1	-	-	-	-	1
Circulation Fan: High-Volume Low-Speed	3.2.15	Energy Savings (MWh)	3.94	-	-	-	-	3.94
		Summer Demand Reduction (MW)	0.0025	-	-	-	-	0.0025
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Demand Controlled Ventilation	3.2.16	Energy Savings (MWh)	2.40	-	-	-	-	2.40
		Summer Demand Reduction (MW)	0.0011	-	-	-	-	0.0011
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Advanced Rooftop Controls	3.2.17	Energy Savings (MWh)	0.17	-	-	-	-	0.17
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
C&I Energy Star Certified Connected Thermostats	3.2.18	Energy Savings (MWh)	0.29	-	-	-	-	0.29

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Adjustment of Programmable Thermostats	3.2.19	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Air Conditioner <5.4 Tons	3.2.2	Energy Savings (MWh)	12.28	12.28	12.28	12.28	12.28	61.39
		Summer Demand Reduction (MW)	0.0060	0.0060	0.0060	0.0060	0.0060	0.0299
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	80	80	80	80	80	401
HP <5.4 Tons	3.2.2	Energy Savings (MWh)	66.12	66.12	66.12	66.12	66.12	330.62
		Summer Demand Reduction (MW)	0.0321	0.0321	0.0321	0.0321	0.0321	0.1607
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	160	160	160	160	160	802
Packaged Terminal Air Conditioner	3.2.2	Energy Savings (MWh)	0.98	0.98	0.98	0.98	0.98	4.92
		Summer Demand Reduction (MW)	0.0005	0.0005	0.0005	0.0005	0.0005	0.0024
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	4	4	4	4	4	21
Packaged Terminal Heat Pump	3.2.2	Energy Savings (MWh)	8.80	8.80	8.80	8.80	8.80	44.00
		Summer Demand Reduction (MW)	0.0043	0.0043	0.0043	0.0043	0.0043	0.0214
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	21	21	21	21	21	105

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Unitary Air Conditioner 20 to 63.3 Tons	3.2.2	Energy Savings (MWh)	81.60	81.60	81.60	81.60	81.60	408.01
		Summer Demand Reduction (MW)	0.0398	0.0398	0.0398	0.0398	0.0398	0.1988
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	692	692	692	692	692	3,458
Unitary Air Conditioner >63.3 Tons	3.2.2	Energy Savings (MWh)	119.02	119.02	119.02	119.02	119.02	595.09
		Summer Demand Reduction (MW)	0.0579	0.0579	0.0579	0.0579	0.0579	0.2894
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	482	482	482	482	482	2,409
Unitary Heat Pump 11.3 to 20 Tons	3.2.2	Energy Savings (MWh)	45.41	45.41	45.41	45.41	45.41	227.06
		Summer Demand Reduction (MW)	0.0221	0.0221	0.0221	0.0221	0.0221	0.1104
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	388	388	388	388	388	1,941
Unitary Heat Pump 5.4 to 11.3 Tons	3.2.2	Energy Savings (MWh)	35.76	35.76	35.76	35.76	35.76	178.80
		Summer Demand Reduction (MW)	0.0175	0.0175	0.0175	0.0175	0.0175	0.0873
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	293	293	293	293	293	1,466
Variable Refrigerant Flow (VRF)	3.2.2	Energy Savings (MWh)	455.35	455.35	455.35	455.35	455.35	2,276.77
		Summer Demand Reduction (MW)	0.2217	0.2217	0.2217	0.2217	0.2217	1.1087
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1,320	1,320	1,320	1,320	1,320	6,599
Duct Sealing and Insulation	3.2.20	Energy Savings (MWh)	1.26	-	-	-	-	1.26
		Summer Demand Reduction (MW)	0.0006	-	-	-	-	0.0006
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1	-	-	-	-	1
Chilled Water Pipe Insulation	3.2.21	Energy Savings (MWh)	5.50	5.50	5.50	5.50	5.50	27.51
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	161	161	161	161	161	806
Air Cooled Chiller	3.2.3	Energy Savings (MWh)	106.74	106.74	106.74	106.74	106.74	533.69
		Summer Demand Reduction (MW)	0.0517	0.0517	0.0517	0.0517	0.0517	0.2585
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	834	834	834	834	834	4,169
Water Cooled Chiller	3.2.3	Energy Savings (MWh)	73.38	73.38	73.38	73.38	73.38	366.91
		Summer Demand Reduction (MW)	0.0357	0.0357	0.0357	0.0357	0.0357	0.1785
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	834	834	834	834	834	4,169
Water Source Heat Pump	3.2.4	Energy Savings (MWh)	4.07	4.07	4.07	4.07	4.07	20.37
		Summer Demand Reduction (MW)	0.0020	0.0020	0.0020	0.0020	0.0020	0.0099
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	10	10	10	10	10	52
Ductless Mini-Split Heat Pumps – Commercial < 5.4 Tons	3.2.5	Energy Savings (MWh)	2.42	-	-	-	-	2.42
		Summer Demand Reduction (MW)	0.0011	-	-	-	-	0.0011
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Mini/Multi Split Heat Pump <5.4 Tons	3.2.6	Energy Savings (MWh)	264.24	264.24	264.24	264.24	264.24	1,321.21
		Summer Demand Reduction (MW)	0.1285	0.1285	0.1285	0.1285	0.1285	0.6425

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	489	489	489	489	489	2,447
Small C&I HVAC Refrigerant Charge Correction	3.2.7	Energy Savings (MWh)	0.06	-	-	-	-	0.06
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
HVAC Tune Up	3.2.8	Energy Savings (MWh)	0.12	-	-	-	-	0.12
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Room Air Conditioner	3.2.9	Energy Savings (MWh)	0.03	-	-	-	-	0.03
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Premium Efficiency Motors	3.3.1	Energy Savings (MWh)	0.06	-	-	-	-	0.06
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
VFD - HVAC Fan Motor	3.3.2	Energy Savings (MWh)	24.92	24.92	24.92	24.92	24.92	124.59
		Summer Demand Reduction (MW)	0.0028	0.0028	0.0028	0.0028	0.0028	0.0138
		Winter Demand Reduction (MW)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0086
		Projected Participation	14	14	14	14	14	69
VFD - HVAC Pump Motor	3.3.2	Energy Savings (MWh)	10.33	10.33	10.33	10.33	10.33	51.63

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0011	0.0011	0.0011	0.0011	0.0011	0.0054
		Winter Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0034
		Projected Participation	5	5	5	5	5	27
VFD - Process Fan Motor	3.3.2	Energy Savings (MWh)	23.38	23.38	23.38	23.38	23.38	116.90
		Summer Demand Reduction (MW)	0.0027	0.0027	0.0027	0.0027	0.0027	0.0136
		Winter Demand Reduction (MW)	0.0021	0.0021	0.0021	0.0021	0.0021	0.0105
		Projected Participation	9	9	9	9	9	45
VFD Process Pump Motor	3.3.2	Energy Savings (MWh)	23.50	23.50	23.50	23.50	23.50	117.48
		Summer Demand Reduction (MW)	0.0028	0.0028	0.0028	0.0028	0.0028	0.0140
		Winter Demand Reduction (MW)	0.0022	0.0022	0.0022	0.0022	0.0022	0.0109
		Projected Participation	9	9	9	9	9	45
ECM Circulating Fan	3.3.3	Energy Savings (MWh)	4.33	4.33	4.33	4.33	4.33	21.65
		Summer Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0039
		Winter Demand Reduction (MW)	0.0004	0.0004	0.0004	0.0004	0.0004	0.0019
		Projected Participation	20	20	20	20	20	101
VSD on Kitchen Exhaust Fan	3.3.4	Energy Savings (MWh)	2.80	-	-	-	-	2.80
		Summer Demand Reduction (MW)	0.0004	-	-	-	-	0.0004
		Winter Demand Reduction (MW)	0.0004	-	-	-	-	0.0004
		Projected Participation	1	-	-	-	-	1
ECM Pumps	3.3.5	Energy Savings (MWh)	8.01	8.01	8.01	8.01	8.01	40.06
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	276	276	276	276	276	1,381

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
PEI-Rated Pumps	3.3.6	Energy Savings (MWh)	144.12	144.12	144.12	144.12	144.12	720.61
		Summer Demand Reduction (MW)	0.0240	0.0240	0.0240	0.0240	0.0240	0.1200
		Winter Demand Reduction (MW)	0.0151	0.0151	0.0151	0.0151	0.0151	0.0754
		Projected Participation	28	28	28	28	28	139
Heat Pump Water Heater	3.4.1	Energy Savings (MWh)	19.71	19.71	19.71	19.71	19.71	98.53
		Summer Demand Reduction (MW)	0.0050	0.0050	0.0050	0.0050	0.0050	0.0251
		Winter Demand Reduction (MW)	0.0032	0.0032	0.0032	0.0032	0.0032	0.0160
		Projected Participation	18	18	18	18	18	92
Low-Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Program	3.4.2	Energy Savings (MWh)	1.19	-	-	-	-	1.19
		Summer Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Winter Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Projected Participation	1	-	-	-	-	1
Domestic Hot Water Pipe Insulation	3.4.3	Energy Savings (MWh)	0.01	-	-	-	-	0.01
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Refrigeration/Freezer Cases	3.5.1	Energy Savings (MWh)	0.22	-	-	-	-	0.22
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Auto-Closer for Walk-In Cooler Doors	3.5.10	Energy Savings (MWh)	1.20	1.20	1.20	1.20	1.20	6.02
		Summer Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0041
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	2	2	2	2	2	9
Auto-Closer for Walk-in Cooler Doors	3.5.10	Energy Savings (MWh)	1.22	1.22	1.22	1.22	1.22	6.12
		Summer Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0042
		Winter Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0042
		Projected Participation	2	2	2	2	2	9
Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers	3.5.11	Energy Savings (MWh)	5.11	5.11	5.11	5.11	5.11	25.55
		Summer Demand Reduction (MW)	0.0006	0.0006	0.0006	0.0006	0.0006	0.0029
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	13	13	13	13	13	67
Suction Pipe Insulation for Walk-In Coolers and Freezers	3.5.12	Energy Savings (MWh)	1.18	1.18	1.18	1.18	1.18	5.88
		Summer Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0002
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	13	13	13	13	13	63
Refrigerated Display Cases with Doors Replacing Open Cases	3.5.13	Energy Savings (MWh)	3.82	3.82	3.82	3.82	3.82	19.12
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0004
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	14	14	14	14	14	70
Adding Doors to Existing Refrigerated Display Cases	3.5.14	Energy Savings (MWh)	2.24	2.24	2.24	2.24	2.24	11.18
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0005
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	10	10	10	10	10	48
Refrigerated Case Light Occupancy Sensors	3.5.15	Energy Savings (MWh)	0.86	0.86	0.86	0.86	0.86	4.28
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0005

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	8	8	8	8	8	38
Food Service Equipment Novelty Cooler Shutoff	3.5.16	Energy Savings (MWh)	5.80	-	-	-	-	5.80
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
ECM motor for walk in freezer or cooler	3.5.2	Energy Savings (MWh)	26.91	26.91	26.91	26.91	26.91	134.53
		Summer Demand Reduction (MW)	0.0035	0.0035	0.0035	0.0035	0.0035	0.0175
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	30	30	30	30	30	150
ECM motors for reach-in freezer or cooler	3.5.2	Energy Savings (MWh)	7.59	7.59	7.59	7.59	7.59	37.94
		Summer Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0050
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	9	9	9	9	9	44
Controls: Evaporator Fan Controllers	3.5.3	Energy Savings (MWh)	4.88	4.88	4.88	4.88	4.88	24.42
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0007
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	4	4	4	4	4	22
Evaporator Fan Motor Controls	3.5.3	Energy Savings (MWh)	4.97	4.97	4.97	4.97	4.97	24.84
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0007
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	5	5	5	5	5	23
Controls: Floating Head Pressure Controls	3.5.4	Energy Savings (MWh)	0.36	-	-	-	-	0.36

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Anti-Sweat Heater Controls	3.5.5	Energy Savings (MWh)	3.66	3.66	3.66	3.66	3.66	18.28
		Summer Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0003
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	5
Controls: Evaporator Coil Defrost Control	3.5.6	Energy Savings (MWh)	9.85	9.85	9.85	9.85	9.85	49.26
		Summer Demand Reduction (MW)	0.0003	0.0003	0.0003	0.0003	0.0003	0.0013
		Winter Demand Reduction (MW)	0.0001	0.0001	0.0001	0.0001	0.0001	0.0007
		Projected Participation	9	9	9	9	9	45
Variable Speed Refrigeration Compressor	3.5.7	Energy Savings (MWh)	0.35	-	-	-	-	0.35
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Strip Curtains for Walk-In Freezers and Coolers	3.5.8	Energy Savings (MWh)	7.70	7.70	7.70	7.70	7.70	38.52
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0038
		Projected Participation	4	4	4	4	4	19
Night Covers for Display Cases	3.5.9	Energy Savings (MWh)	0.32	-	-	-	-	0.32
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Energy Star Clothes Washer	3.6.1	Energy Savings (MWh)	0.14	-	-	-	-	0.14
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Bathroom Ventilation Fan in Commercial Applications	3.6.2	Energy Savings (MWh)	0.04	-	-	-	-	0.04
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Ice Machines	3.7.1	Energy Savings (MWh)	0.42	-	-	-	-	0.42
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1
Commercial Induction Cooktops	3.7.10	Energy Savings (MWh)	0.03	-	-	-	-	0.03
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Controls: Beverage And Snack Machine Controls	3.7.2	Energy Savings (MWh)	0.25	-	-	-	-	0.25
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	-	-	-	-	1
Energy Star Electric Steam Cooker	3.7.3	Energy Savings (MWh)	5.34	-	-	-	-	5.34
		Summer Demand Reduction (MW)	0.0010	-	-	-	-	0.0010
		Winter Demand Reduction (MW)	0.0006	-	-	-	-	0.0006

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation	1	-	-	-	-	1
Energy Star Combination Oven	3.7.4	Energy Savings (MWh)	0.02	-	-	-	-	0.02
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Commercial Convection Oven	3.7.5	Energy Savings (MWh)	1.67	-	-	-	-	1.67
		Summer Demand Reduction (MW)	0.0003	-	-	-	-	0.0003
		Winter Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Projected Participation	1	-	-	-	-	1
Energy Star Commercial Fryer	3.7.6	Energy Savings (MWh)	0.14	-	-	-	-	0.14
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Commercial Hot Food Holding Cabinet	3.7.7	Energy Savings (MWh)	0.35	-	-	-	-	0.35
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Commercial Dishwasher	3.7.8	Energy Savings (MWh)	7.99	-	-	-	-	7.99
		Summer Demand Reduction (MW)	0.0015	-	-	-	-	0.0015
		Winter Demand Reduction (MW)	0.0010	-	-	-	-	0.0010
		Projected Participation	1	-	-	-	-	1
Energy Star Commercial Griddle	3.7.9	Energy Savings (MWh)	1.65	-	-	-	-	1.65
		Summer Demand Reduction (MW)	0.0003	-	-	-	-	0.0003

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0002	-	-	-	-	0.0002
		Projected Participation	1	-	-	-	-	1
Wall And Ceiling Insulation	3.8.1	Energy Savings (MWh)	4.05	-	-	-	-	4.05
		Summer Demand Reduction (MW)	0.0018	-	-	-	-	0.0018
		Winter Demand Reduction (MW)	0.0014	-	-	-	-	0.0014
		Projected Participation	1	-	-	-	-	1
Advanced Power Strips	3.9.1	Energy Savings (MWh)	0.05	-	-	-	-	0.05
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Energy Star Servers	3.9.2	Energy Savings (MWh)	0.46	-	-	-	-	0.46
		Summer Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Winter Demand Reduction (MW)	0.0001	-	-	-	-	0.0001
		Projected Participation	1	-	-	-	-	1
Server Virtualization	3.9.3	Energy Savings (MWh)	0.21	-	-	-	-	0.21
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Custom, Compressed Air	Custom	Energy Savings (MWh)	91.53	91.53	91.53	91.53	91.53	457.66
		Summer Demand Reduction (MW)	0.0119	0.0119	0.0119	0.0119	0.0119	0.0595
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	1	1	1	1	1	6
Combined Heat and Power	Custom	Energy Savings (MWh)	224.76	224.76	224.76	224.76	224.76	1,123.79

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0247	0.0247	0.0247	0.0247	0.0247	0.1236
		Winter Demand Reduction (MW)	0.0247	0.0247	0.0247	0.0247	0.0247	0.1236
		Projected Participation	224,757	224,757	224,757	224,757	224,757	1,123,786
Custom, Compressed Air	Custom	Energy Savings (MWh)	1,074.45	1,074.45	1,074.45	1,074.45	1,074.45	5,372.27
		Summer Demand Reduction (MW)	0.1612	0.1612	0.1612	0.1612	0.1612	0.8058
		Winter Demand Reduction (MW)	0.1397	0.1397	0.1397	0.1397	0.1397	0.6984
		Projected Participation	1,074,454	1,074,454	1,074,454	1,074,454	1,074,454	5,372,268
Custom, Cooling	Custom	Energy Savings (MWh)	307.80	307.80	307.80	307.80	307.80	1,538.98
		Summer Demand Reduction (MW)	0.0113	0.0113	0.0113	0.0113	0.0113	0.0565
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation	6	6	6	6	6	32
Custom, HVAC	Custom	Energy Savings (MWh)	368.38	368.38	368.38	368.38	368.38	1,841.91
		Summer Demand Reduction (MW)	0.0516	0.0516	0.0516	0.0516	0.0516	0.2579
		Winter Demand Reduction (MW)	0.0516	0.0516	0.0516	0.0516	0.0516	0.2579
		Projected Participation	368,381	368,381	368,381	368,381	368,381	1,841,907
Custom, Lighting	Custom	Energy Savings (MWh)	376.31	376.31	376.31	376.31	376.31	1,881.53
		Summer Demand Reduction (MW)	0.0677	0.0677	0.0677	0.0677	0.0677	0.3387
		Winter Demand Reduction (MW)	0.0452	0.0452	0.0452	0.0452	0.0452	0.2258
		Projected Participation	376,306	376,306	376,306	376,306	376,306	1,881,529
Custom, Other	Custom	Energy Savings (MWh)	933.72	933.72	933.72	933.72	933.72	4,668.62
		Summer Demand Reduction (MW)	0.1369	0.1369	0.1369	0.1369	0.1369	0.6843
		Winter Demand Reduction (MW)	0.1234	0.1234	0.1234	0.1234	0.1234	0.6171
		Projected Participation	552,902	552,902	552,902	552,902	552,902	2,764,508

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Custom, Process	Custom	Energy Savings (MWh)	1,268.45	1,268.45	1,268.45	1,268.45	1,268.45	6,342.24
		Summer Demand Reduction (MW)	0.2319	0.2319	0.2319	0.2319	0.2319	1.1593
		Winter Demand Reduction (MW)	0.1652	0.1652	0.1652	0.1652	0.1652	0.8260
		Projected Participation	1,268,449	1,268,449	1,268,449	1,268,449	1,268,449	6,342,245
Custom, Refrigeration	Custom	Energy Savings (MWh)	2,857.76	2,857.76	2,857.76	2,857.76	2,857.76	14,288.82
		Summer Demand Reduction (MW)	0.2844	0.2844	0.2844	0.2844	0.2844	1.4220
		Winter Demand Reduction (MW)	0.2836	0.2836	0.2836	0.2836	0.2836	1.4179
		Projected Participation	2,835,870	2,835,870	2,835,870	2,835,870	2,835,870	14,179,348
Customer Front-of-the-Meter	Custom	Energy Savings (MWh)	299.03	-	-	-	-	299.03
		Summer Demand Reduction (MW)	0.0642	-	-	-	-	0.0642
		Winter Demand Reduction (MW)	0.0542	-	-	-	-	0.0542
		Projected Participation	1	-	-	-	-	1
Energy Star Level 2 EV Charger, Networked	Custom	Energy Savings (MWh)	0.05	-	-	-	-	0.05
		Summer Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Winter Demand Reduction (MW)	0.0000	-	-	-	-	0.0000
		Projected Participation	1	-	-	-	-	1
Load Curtailment for Commercial and Industrial Programs	Custom	Energy Savings (MWh)	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0179	0.0179	0.0179	0.0179	0.0179	0.0896
		Winter Demand Reduction (MW)	0.0154	0.0154	0.0154	0.0154	0.0154	0.0772
		Projected Participation	18	18	18	18	18	90
Retrocommissioning	Custom	Energy Savings (MWh)	1,055.39	1,055.39	1,055.39	1,055.39	1,055.39	5,276.95
		Summer Demand Reduction (MW)	0.0469	0.0469	0.0469	0.0469	0.0469	0.2345

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0339	0.0339	0.0339	0.0339	0.0339	0.1694
		Projected Participation	2	2	2	2	2	12
Strategic Energy Management	Custom	Energy Savings (MWh)	293.16	-	-	-	-	293.16
		Summer Demand Reduction (MW)	0.0106	-	-	-	-	0.0106
		Winter Demand Reduction (MW)	0.0076	-	-	-	-	0.0076
		Projected Participation	1	-	-	-	-	1
Virtual Commissioning	Custom	Energy Savings (MWh)	2,820.90	2,820.90	2,820.90	2,820.90	2,820.90	14,104.48
		Summer Demand Reduction (MW)	0.4340	0.4340	0.4340	0.4340	0.4340	2.1699
		Winter Demand Reduction (MW)	0.3134	0.3134	0.3134	0.3134	0.3134	1.5669
		Projected Participation	14	14	14	14	14	71
Virtual SEM	Custom	Energy Savings (MWh)	1,719.46	1,719.46	1,719.46	1,719.46	1,719.46	8,597.32
		Summer Demand Reduction (MW)	0.2194	0.2194	0.2194	0.2194	0.2194	1.0971
		Winter Demand Reduction (MW)	0.1585	0.1585	0.1585	0.1585	0.1585	0.7923
		Projected Participation	7	7	7	7	7	36
Kit - Electric Hot Water Kit (SF or MF)	Custom	Energy Savings (MWh)	96.77	96.77	96.77	96.77	96.77	483.86
		Summer Demand Reduction (MW)	0.0101	0.0101	0.0101	0.0101	0.0101	0.0504
		Winter Demand Reduction (MW)	0.0186	0.0186	0.0186	0.0186	0.0186	0.0931
		Projected Participation	598	598	598	598	598	2,992
Kit - Gas Hot Water Kit (SF or MF)	Custom	Energy Savings (MWh)	83.48	83.48	83.48	83.48	83.48	417.40
		Summer Demand Reduction (MW)	0.0079	0.0079	0.0079	0.0079	0.0079	0.0396
		Winter Demand Reduction (MW)	0.0146	0.0146	0.0146	0.0146	0.0146	0.0731
		Projected Participation	908	908	908	908	908	4,540

Table 10: Program Budget

Residential Energy Efficiency Program (REEP) Appliance Recycling

Cost Element Total Budget ($000)	Metric	PY18	PY19	PY20	PY21	PY22	Phase V Total
Incentives	Rebates	$167	$184	$202	$222	$244	$1,019
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$167	$184	$202	$222	$244	$1,019
Non-Incentives	Program Design	$1	$1	$1	$2	$2	$7
	Administrative	$17	$19	$21	$23	$25	$104
	EDC Delivery Costs	$9	$10	$11	$12	$13	$54
	CSP Delivery Fees	$256	$281	$310	$340	$374	$1,561
	Marketing	$5	$5	$6	$6	$7	$28
	EM&V	$8	$9	$10	$11	$12	$50
	Implementation Services	$7	$7	$8	$9	$10	$41
	Non-Incentive Total	$302	$333	$366	$402	$443	$1,846
Percent Incentives		44.0%	44.0%	44.0%	44.0%	44.0%	44.0%

Table 10: Program Budget (*continued*)

Residential Online Marketplace

Cost Element Total Budget ($000)	Metric	PY18	PY19	PY20	PY21	PY22	Phase V Total
Incentives	Rebates	$292	$297	$301	$306	$310	$1,506
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$292	$297	$301	$306	$310	$1,506
Non-Incentives	Program Design	$1	$1	$2	$2	$2	$8
	Administrative	$22	$22	$22	$22	$23	$111
	EDC Delivery Costs	$11	$11	$11	$12	$12	$57
	CSP Delivery Fees	$371	$376	$382	$388	$393	$1,911
	Marketing	$6	$6	$6	$6	$6	$30
	EM&V	$10	$10	$11	$11	$11	$53
	Implementation Services	$8	$9	$9	$9	$9	$43
	Non-Incentive Total	$430	$436	$443	$449	$456	$2,213
Percent Incentives		49.0%	49.0%	49.0%	49.0%	49.0%	49.0%

Table 10: Program Budget (*continued*)

Residential Midstream Incentives

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates						
	Upstream/Midstream Buydown	$877	$927	$943	$960	$977	$4,684
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$877	$927	$943	$960	$977	$4,684
Non-Incentives	Program Design	$4	$4	$5	$5	$6	$24
	Administrative	$64	$67	$69	$70	$71	$341
	EDC Delivery Costs	$33	$35	$35	$36	$37	$176
	CSP Delivery Fees	$459	$485	$493	$502	$511	$2,450
	Marketing	$17	$18	$19	$19	$19	$93
	EM&V	$31	$32	$33	$33	$34	$163
	Implementation Services	$25	$26	$27	$27	$28	$134
	Non-Incentive Total	$633	$669	$681	$693	$705	$3,380
Percent Incentives		58.1%	58.1%	58.1%	58.1%	58.1%	58.1%

Table 10: Program Budget (*continued*)

Low-Income Energy Efficiency Program

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates						
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor	$1,778	$1,797	$1,815	$1,832	$1,852	$9,073
	Incentive Total	$1,778	$1,797	$1,815	$1,832	$1,852	$9,073
Non-Incentives	Program Design	$3	$4	$4	$4	$5	$20
	Administrative	$57	$57	$58	$58	$59	$289
	EDC Delivery Costs	$29	$30	$30	$30	$30	$149
	CSP Delivery Fees	$1,046	$1,057	$1,067	$1,077	$1,089	$5,336
	Marketing	$15	$16	$16	$16	$16	$79
	EM&V	$27	$27	$28	$28	$28	$138
	Implementation Services	$22	$22	$23	$23	$23	$113
	Non-Incentive Total	$1,199	$1,212	$1,225	$1,237	$1,251	$6,124
Percent Incentives		63.4%	63.4%	63.4%	63.4%	63.4%	63.4%

Table 10: Program Budget (*continued*)

Residential Behavioral Energy Efficiency

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates						
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$0	$0	$0	$0	$0	$0
Non-Incentives	Program Design	$6	$6	$7	$8	$9	$36
	Administrative	$99	$116	$118	$99	$84	$515
	EDC Delivery Costs	$51	$60	$61	$51	$43	$266
	CSP Delivery Fees	$692	$812	$824	$692	$585	$3,605
	Marketing	$27	$32	$32	$27	$23	$140
	EM&V	$47	$55	$56	$47	$40	$246
	Implementation Services	$39	$45	$46	$39	$33	$202
	Non-Incentive Total	$962	$1,128	$1,145	$962	$813	$5,009
Percent Incentives		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Table 10: Program Budget (*continued*)

Low-Income Behavioral Energy Efficiency

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates						
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$0	$0	$0	$0	$0	$0
Non-Incentives	Program Design	$1	$1	$1	$1	$1	$5
	Administrative	$22	$12	$12	$12	$14	$72
	EDC Delivery Costs	$11	$6	$6	$6	$7	$37
	CSP Delivery Fees	$198	$107	$107	$107	$122	$641
	Marketing	$6	$3	$3	$3	$4	$19
	EM&V	$11	$6	$6	$6	$7	$34
	Implementation Services	$9	$5	$5	$5	$5	$28
	Non-Incentive Total	$259	$139	$139	$139	$159	$836
Percent Incentives		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Table 10: Program Budget (*continued*)

Small-Medium Nonresidential

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates	$1,651	$1,832	$2,095	$2,343	$1,955	$9,876
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$0	$0	$0	$0	$0	$0
	Direct-Install Materials and Labor	$412	$481	$618	$756	$481	$2,748
	Incentive Total	$2,063	$2,313	$2,713	$3,098	$2,436	$12,623
Non-Incentives	Program Design	$15	$16	$18	$20	$21	$90
	Administrative	$217	$240	$275	$307	$257	$1,296
	EDC Delivery Costs	$112	$124	$142	$159	$132	$669
	CSP Delivery Fees	$1,709	$1,879	$2,096	$2,296	$2,029	$10,009
	Marketing	$59	$65	$75	$84	$70	$353
	EM&V	$105	$116	$130	$143	$125	$619
	Implementation Services	$85	$94	$108	$120	$101	$508
	Non-Incentive Total	$2,301	$2,535	$2,843	$3,129	$2,735	$13,543
Percent Incentives		77.1%	75.4%	74.1%	77.9%	76.3%	83.4%

Table 10: Program Budget (*continued*)

Large Commercial Downstream Incentives

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates	$579	$675	$868	$1,061	$675	$3,859
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$579	$675	$868	$1,061	$675	$3,859
Non-Incentives	Program Design	$10	$11	$12	$13	$14	$59
	Administrative	$128	$149	$192	$234	$149	$852
	EDC Delivery Costs	$66	$77	$99	$121	$77	$440
	CSP Delivery Fees	$449	$524	$673	$823	$524	$2,993
	Marketing	$35	$41	$52	$64	$41	$232
	EM&V	$61	$71	$92	$112	$71	$407
	Implementation Services	$50	$58	$75	$92	$58	$334
	Non-Incentive Total	$798	$931	$1,195	$1,459	$934	$5,318
Percent Incentives		42.1%	42.0%	42.0%	42.1%	42.1%	42.0%

Table 10: Program Budget (*continued*)

Public Agency Partnership

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates	$1,311	$1,602	$1,675	$1,602	$1,092	$7,282
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$1,311	$1,602	$1,675	$1,602	$1,092	$7,282
Non-Incentives	Program Design	$5	$5	$5	$5	$5	$26
	Administrative	$76	$93	$97	$93	$63	$421
	EDC Delivery Costs	$39	$48	$50	$48	$33	$217
	CSP Delivery Fees	$479	$585	$612	$585	$399	$2,659
	Marketing	$21	$25	$26	$25	$17	$115
	EM&V	$36	$44	$46	$44	$30	$201
	Implementation Services	$33	$36	$38	$36	$25	$168
	Non-Incentive Total	$688	$837	$874	$837	$572	$3,807.641
Percent Incentives		65.6%	65.7%	65.7%	65.7%	65.6%	65.7%

Table 10: Program Budget (*continued*)

Large Industrial Downstream Incentives

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates	$1,037	$1,747	$2,232	$2,424	$2,656	$10,096
	Upstream/Midstream Buydown						
	Kits						
	Direct-Install Materials and Labor						
	Incentive Total	$1,037	$1,747	$2,232	$2,424	$2,656	$10,096
Non-Incentives	Program Design	$8	$8	$9	$10	$11	$47
	Administrative	$70	$118	$151	$164	$179	$682
	EDC Delivery Costs	$36	$61	$78	$85	$93	$352
	CSP Delivery Fees	$375	$632	$807	$877	$960	$3,650
	Marketing	$19	$32	$41	$45	$49	$186
	EM&V	$33	$56	$72	$78	$86	$326
	Implementation Services	$27	$46	$59	$64	$70	$267
	Non-Incentive Total	$566	$954	$1,218	$1,323	$1,449	$5,511
Percent Incentives		64.7%	64.7%	64.7%	64.7%	64.7%	64.7%

Table 10: Program Budget (*continued*)

All Programs

Cost Element Total Budget ($000)	Metric	PY13	PY14	PY15	PY16	PY17	Phase V Total
Incentives	Rebates	$5,914	$7,264	$8,317	$8,918	$7,910	$38,322
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$0	$0	$0	$0	$0	$0
	Direct-Install Materials and Labor	$2,190	$2,278	$2,433	$2,587	$2,333	$11,821
	Incentive Total	$8,104	$9,542	$10,749	$11,505	$10,243	$50,143
Non-Incentives	Program Design	$54	$58	$64	$69	$76	$321
	Administrative	$770	$893	$1,013	$1,082	$923	$4,683
	EDC Delivery Costs	$398	$461	$523	$559	$477	$2,418
	CSP Delivery Fees	$6,033	$6,737	$7,371	$7,687	$6,987	$34,814
	Marketing	$210	$243	$276	$295	$251	$1,275
	EM&V	$370	$428	$483	$514	$443	$2,238
	Implementation Services	$305	$350	$397	$424	$362	$1,838
	Non-Incentive Total	$8,139	$9,172	$10,126	$10,630	$9,520	$47,587
Percent Incentives		49.9%	51.0%	51.5%	52.0%	51.8%	51.3%

Table 11: Sector-Specific Summary of EE&C Costs

Residential Portfolio													
	Cost Elements ($)								Levelized Cost *(per TRC Order)*	Total Cost	Acquisition Cost ($/MWh)	Levelized Cost ($/MWh)	Acquisition Cost ($/MW)
EE&C Program	**Incentives**	**Program Design**	**Adminis-trative**	**EDC Delivery Costs**	**CSP Delivery Fees**	**Marketing**	**EM&V**	**Other**					
Residential - Appliance Recycling	$1,019,277.00	$7,223.10	$104,441.13	$53,932.50	$1,561,334.00	$28,431.31	$49,915.72	$40,930.91	$2,766,879.31	$2,865,486	$467.76	$88.99	$1,878,897
Residential - Online Marketplace	$1,506,378.00	$7,664.08	$110,817.40	$57,225.14	$1,910,573.00	$30,167.07	$52,963.13	$43,429.79	$3,413,597.13	$3,719,218	$572.19	$73.89	$1,208,737
Residential - Midstream Incentives	$4,683,569.23	$23,581.79	$340,976.60	$176,077.37	$2,449,965.26	$92,821.76	$162,963.48	$133,630.14	$37,675,962.82	$8,063,586	$403.18	$190.31	$9,250,584
Residential – Low-Income EE	$9,073,271.25	$19,964.34	$288,670.79	$149,067.10	$5,336,195.69	$78,582.90	$137,964.89	$113,131.27	$3,472,824.05	$15,196,848	$897.52	$31.73	$2,445,874
Residential - Behavioral Efficiency	$0.00	$35,608.50	$514,874.67	$265,876.82	$3,604,913.00	$140,160.86	$246,074.86	$201,781.51	$4,973.68	$5,009,290	$165.87	$0.17	$710,538
Low-Income Behavioral Efficiency	$0.00	$4,952.18	$71,605.09	$36,976.25	$640,501.00	$19,492.57	$34,222.33	$28,062.33	$830.86	$835,812	$199.00	$0.21	$939,114
Nonresidential Portfolio													
Small Medium Nonresidential Efficiency	$12,623,280.46	$89,609.80	$1,295,696.65	$669,086.54	$10,009,073.32	$352,718.76	$619,264.75	$507,788.87	$3,477,404.20	$26,166,519	$344.29	$4.62	$2,227,313
Large Commercial - Downstream	$3,858,721.02	$58,954.47	$852,441.5	$440,193.4	$2,992,649.7	$232,054.4	$407,408.7	$334,075.3	$18,135,954.06	$9,176,499	$183.53	$40.92	$850,105
Public Agency Partnership	$7,281,962.73	$26,215.72	$421,179.4	$217,493.4	$2,658,827.0	$114,654.8	$201,294.9	$167,975.4	$8,920,535.53	$11,089,603	$448.89	$40.74	$2,587,160
Large Industrial - Downstream	$10,096,379.52	$47,163.58	$681,953.2	$352,154.7	$3,650,418.0	$185,643.5	$325,927.0	$267,260.3	$5,663,407.54	$15,606,900	$390.17	$14.30	$2,720,466
Portfolio Total	$50,142,839.21	$320,937.56	$4,682,656.44	$2,418,083.27	$34,814,449.87	$1,274,727.98	$2,237,999.79	$1,838,065.88	$83,532,369.20	$97,729,760	$355.8173	$37.49	$1,872,476

Table 12: Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost	Basis for Cost Allocation	Sector Cost Allocation ($)		
			Residential *(Including Low-Income)*	**Commercial/ Industrial Small**	**Commercial/ Industrial Large**
Common Utility Staff	$1,002,682	% Plan Savings	$306,496	$277,447	$418,739
Marketing	$850,000	% Plan Savings	$259,825	$235,199	$354,976
Implementation Services	$1,583,105	% Plan Savings	$483,918	$438,052	$661,134
Tracking System Upgrade and Maintenance	$971,641	% Plan Savings	$297,008	$268,857	$405,775
Total	$4,407,427		$1,347,248	$1,219,555	$1,840,624

Table 13: Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-Specific Costs[1]	Total Common Costs[2]	Total of all Costs[2]
Residential (Including Low-Income)	$34,342,991	$1,347,248	$35,690,239
Commercial/Industrial Small	$24,946,964	$1,219,555	$26,166,519
Commercial/Industrial Large	$34,032,377	$1,840,624	$35,873,001
Totals	$93,322,332	$4,407,427	$97,729,759

1-Cost figures are carried over from Table 10, Total Cost Column.

2-Cost figures are to be carried over from the bottom row of Table 11

Common or indirect cost will be allocated based on savings contributions from each sector program.

Table 14: TRC Benefits Tables (Gross)

Gross TRC Benefits

Portfolio	NTGR & TRC			TRC Costs by Program Year ($000)				TRC Benefits By Program Per Year ($000)				
	Program			Incremental Measure Cost		Program	Total TRC	Capacity	Energy	Fossil Fuel / Water	O&M	Total TRC
Program	Year	NTGR	TRC	Paid by EDC	Paid by Participants	Admin Cost	Costs	Benefits	Benefits	Benefits	Benefits	Benefits
Residential Appliance Recycling	PY13		2.92	167	$152	$302	$302.35	$370	$514	$0	$0	$884
	PY14		2.92	184	$167	$333	$332.53	$407	$566	$0	$0	$972
	PY15		2.92	202	$184	$366	$366.00	$448	$623	$0	$0	$1,070
	PY16		2.92	222	$202	$402	$402.49	$492	$685	$0	$0	$1,177
	PY17		2.92	244	$223	$443	$442.83	$542	$753	$0	$0	$1,295
Program Total		1	2.92	1,019	$928	$1,846	$1,846.21	$2,258	$3,141	$0	$0	$5,399
Residential On-Line Marketplace	PY13		2.21	292	$662	$430	$1,091.79	$1,585	$833	$0	$0	$2,418
	PY14		2.21	297	$672	$436	$1,108.32	$1,609	$846	$0	$0	$2,455
	PY15		2.21	301	$682	$443	$1,124.85	$1,633	$859	$0	$0	$2,492
	PY16		2.21	306	$692	$449	$1,141.37	$1,657	$871	$0	$0	$2,528
	PY17		2.21	310	$702	$456	$1,157.90	$1,681	$884	$0	$0	$2,565
Program Total		1	2.21	1,506	3,411	$2,213	$5,624.23	$8,165	$4,293	$0	$0	$12,458
Residential Midstream Incentives	PY13		0.00	877	$7,052	$633	$7,685.18	$492	$3,352	$0	$0	$3,844
	PY14		0.50	927	$7,454	$669	$8,122.97	$520	$3,543	$0	$0	$4,063
	PY15		0.50	943	$7,588	$681	$8,268.38	$529	$3,607	$0	$0	$4,136
	PY16		0.50	960	$7,721	$693	$8,413.79	$538	$3,670	$0	$0	$4,209
	PY17		0.50	977	$7,857	$705	$8,562.30	$548	$3,735	$0	$0	$4,283
Program Total		1	0.50	4,684	37,673	$3,380	$41,052.62	$2,627	$17,908	$0	$0	$20,535.03
Low Income Energy Efficiency	PY13		2.01	1,778	$679	$1,200	$1,879.43	$1,704	$2,127	-$51	$0	$3,780
	PY14		2.01	1,797	$687	$1,213	$1,899.25	$1,722	$2,150	-$52	$0	$3,820
	PY15		2.01	1,815	$693	$1,225	$1,917.95	$1,739	$2,171	-$52	$0	$3,857
	PY16		2.01	1,832	$700	$1,236	$1,936.07	$1,755	$2,191	-$53	$0	$3,894
	PY17		2.01	1,852	$708	$1,250	$1,957.60	$1,775	$2,216	-$53	$0	$3,937
Program Total		1	2.01	9,073	3,467	$6,124	$9,590.30	$8,694	$10,855	-$261	$0	$19,288
Residential Behavioral Efficiency	PY13		1.41	0	$0	$962	$962.05	$338	$1,015	$0	$0	$1,354
	PY14		1.41	0	$0	$1,128	$1,127.92	$397	$1,190	$0	$0	$1,587
	PY15		1.41	0	$0	$1,145	$1,144.51	$403	$1,208	$0	$0	$1,610
	PY16		1.41	0	$0	$962	$962.05	$338	$1,015	$0	$0	$1,354
	PY17		1.41	0	$0	$813	$812.77	$286	$858	$0	$0	$1,144
Program Total		1	1.41	0	0	$5,009	$5,009.29	$1,762	$5,286	$0	$0	$7,049
Low Income Behavioral Efficiency	PY13		1.15	0	$0	$259	$258.70	$69	$228	$0	$0	$296
	PY14		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY15		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY16		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY17		1.15	0	$0	$159	$159.20	$42	$140	$0	$0	$182
Program Total		1	1.15	0	0	$836	$835.81	$222	$735	$0	$0	$957.650

Portfolio	NTGR & TRC			TRC Costs by Program Year ($000)				TRC Benefits By Program Per Year ($000)				
	Program			Incremental Measure Cost		Program	Total TRC	Capacity	Energy	Fossil Fuel / Water	O&M	Total TRC
Program	Year	NTGR	TRC	Paid by EDC	Paid by Participants	Admin Cost	Costs	Benefits	Benefits	Benefits	Benefits	Benefits
Small-Medium Nonresidential Efficiency	PY13		2.63	2,110	$5,098	$2,264	$6,678	$6,987	$11,209	-$640	$0	$17,556
	PY14		2.63	2,342	$5,658	$2,513	$7,413	$7,755	$12,442	-$711	$0	$19,486
	PY15		2.63	2,677	$6,468	$2,873	$8,474	$8,865	$14,223	-$813	$0	$22,276
	PY16		2.63	2,994	$7,234	$3,213	$9,477	$9,915	$15,907	-$909	$0	$24,913
	PY17		2.63	2,499	$6,037	$2,681	$7,909	$8,274	$13,275	-$758	$0	$20,791
Program Total		1	2.63	12,623	30,496	$13,543	$39,951	$41,796	$67,056	-$3,831	$0	$105,021
Large Commercial Downstream Incentives	PY13		2.56	579	$2,720	$798	$3,517.27	$3,188	$6,013	-$210	$0	$8,991
	PY14		2.56	675	$3,173	$931	$4,103.48	$3,719	$7,015	-$245	$0	$10,490
	PY15		2.56	868	$4,079	$1,196	$5,275.91	$4,782	$9,020	-$315	$0	$13,487
	PY16		2.56	1,061	$4,986	$1,462	$6,448.33	$5,845	$11,024	-$385	$0	$16,484
	PY17		2.56	675	$3,173	$931	$4,103.48	$3,719	$7,015	-$245	$0	$10,490
Program Total		1	2.56	3,859	18,131	$5,318	$23,448.47	$21,253	$40,087	-$1,399	$0	$59,941.15
Public Agency Partnership	PY13		2.31	1,311	$1,605	$685	$2,290.39	$1,842	$3,565	-$124	$0	$5,282
	PY14		2.31	1,602	$1,962	$838	$2,799.37	$2,251	$4,357	-$152	$0	$6,456
	PY15		2.31	1,675	$2,051	$876	$2,926.61	$2,353	$4,556	-$159	$0	$6,750
	PY16		2.31	1,602	$1,962	$838	$2,799.37	$2,251	$4,357	-$152	$0	$6,456
	PY17		2.31	1,092	$1,338	$571	$1,908.66	$1,535	$2,971	-$104	$0	$4,402
Program Total		1	2.31	7,282	8,917	$3,808	$12,724.39	$10,231	$19,807	-$691	$0	$29,347
Large Industrial Downstream Incentives	PY13		4.40	1,037	$581	$566	$1,147.38	$1,583	$3,483	-$17	$0	$5,049
	PY14		4.40	1,747	$979	$954	$1,932.65	$2,667	$5,866	-$28	$0	$8,504
	PY15		4.40	2,232	$1,251	$1,218	$2,469.12	$3,407	$7,494	-$36	$0	$10,865
	PY16		4.40	2,424	$1,359	$1,323	$2,681.76	$3,701	$8,140	-$40	$0	$11,801
	PY17		4.40	2,656	$1,488	$1,449	$2,937.56	$4,053	$8,916	-$43	$0	$12,926
Program Total		1	4.40	10,096	5,658	$5,511	$11,168.46	$15,411	$33,899	-$165	$0	$49,146
All Programs	PY13	1	1.92	8,151	18,550	8,099	25,813	18,157	32,340	-1,043	0	49,455
	PY14	1	2.00	9,571	20,752	9,152	28,979	21,083	38,098	-1,188	0	57,994
	PY15	1	2.08	10,714	22,997	10,161	32,107	24,196	43,882	-1,375	0	66,702
	PY16	1	2.12	11,401	24,856	10,718	34,402	26,529	47,983	-1,538	0	72,975
	PY17	1	2.07	10,306	21,526	9,458	29,951	22,455	40,763	-1,203	0	62,015
Portfolio Total			2.04	50,143	108,680	47,587	151,251	112,420	203,067	-6,347	0	309,140.931

Table 14: TRC Benefits Tables (Net)

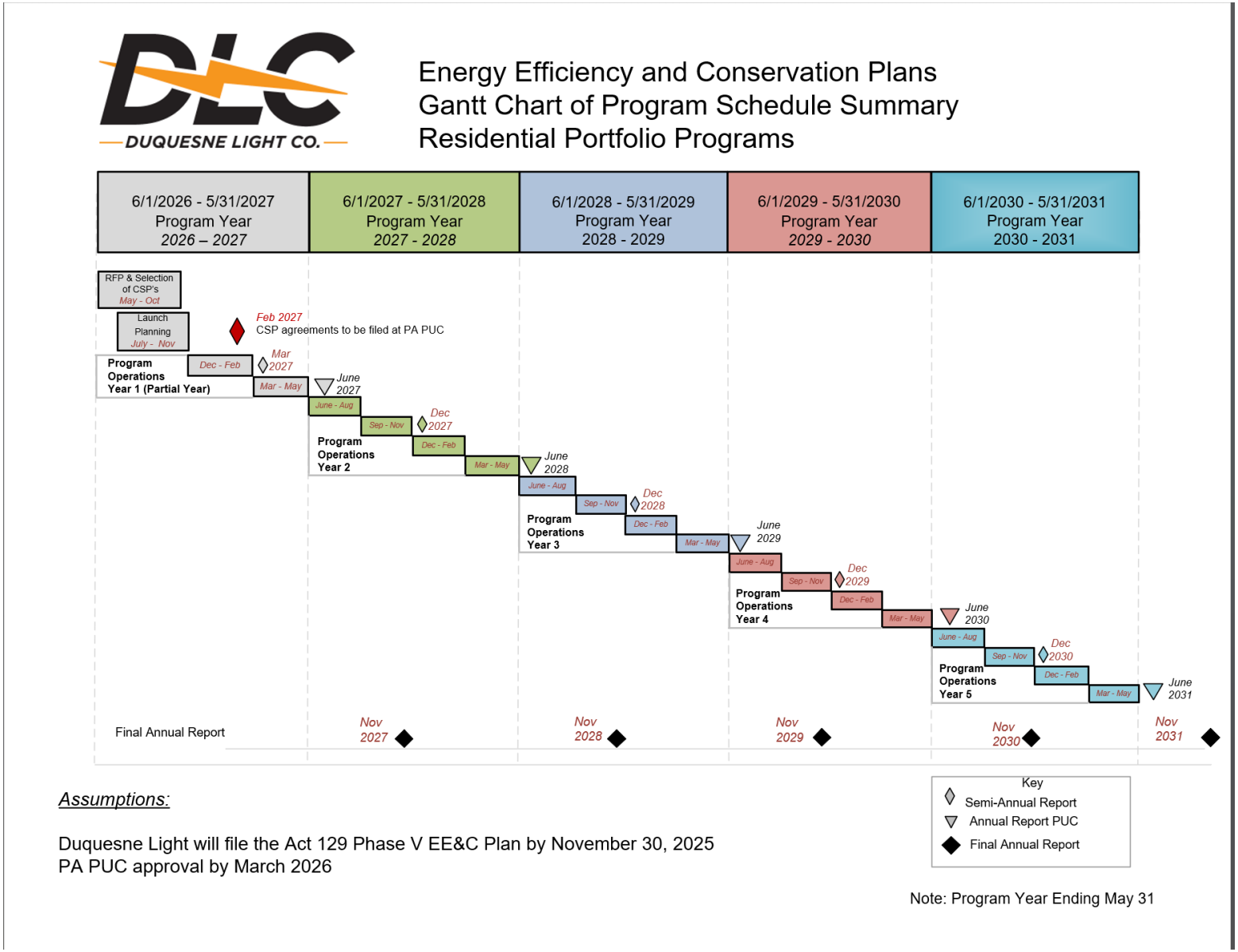
Net TRC Benefits

Portfolio	NTGR & TRC			TRC Costs by Program Year ($000)				TRC Benefits By Program Per Year ($000)				
	Program			Measure Cost								
Program	Year	NTGR	TRC	Paid by EDC	Paid by Participants	Program Admin Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel / Water Benefits	O&M Benefits	Total TRC Benefits
	PY13		2.10	167	$109	$302	$302.35	$265	$369	$0	$0	$634
Residential Appliance Recycling	PY14		2.10	184	$120	$333	$332.53	$291	$405	$0	$0	$697
	PY15		2.10	202	$132	$366	$366.00	$321	$446	$0	$0	$767
	PY16		2.10	222	$145	$402	$402.49	$353	$491	$0	$0	$844
	PY17		2.10	244	$159	$443	$442.83	$388	$540	$0	$0	$928
Program Total		0.717	2.10	1,019	$665	$1,846	$1,846.21	$1,618	$2,251	$0	$0	$3,869
	PY13		2.21	292	$662	$430	$1,091.79	$1,585	$833	$0	$0	$2,418
Residential On-Line Marketplace	PY14		2.21	297	$672	$436	$1,108.32	$1,609	$846	$0	$0	$2,455
	PY15		2.21	301	$682	$443	$1,124.85	$1,633	$859	$0	$0	$2,492
	PY16		2.21	306	$692	$449	$1,141.37	$1,657	$871	$0	$0	$2,528
	PY17		2.21	310	$702	$456	$1,157.90	$1,681	$884	$0	$0	$2,565
Program Total		1	2.21	1,506	3,411	$2,213	$5,624.23	$8,165	$4,293	$0	$0	$12,458
	PY13		0.00	877	$7,052	$633	$7,685.18	$492	$3,352	$0	$0	$3,844
Residential Midstream Incentives	PY14		0.50	927	$7,454	$669	$8,122.97	$520	$3,543	$0	$0	$4,063
	PY15		0.50	943	$7,588	$681	$8,268.38	$529	$3,607	$0	$0	$4,136
	PY16		0.50	960	$7,721	$693	$8,413.79	$538	$3,670	$0	$0	$4,209
	PY17		0.50	977	$7,857	$705	$8,562.30	$548	$3,735	$0	$0	$4,283
Program Total		1	0.50	4,684	37,673	$3,380	$41,052.62	$2,627	$17,908	$0	$0	$20,535.03
Low Income Energy Efficiency	PY13		2.01	1,778	$679	$1,200	$1,879.43	$1,704	$2,127	-$51	$0	$3,780
	PY14		2.01	1,797	$687	$1,213	$1,899.25	$1,722	$2,150	-$52	$0	$3,820
	PY15		2.01	1,815	$693	$1,225	$1,917.95	$1,739	$2,171	-$52	$0	$3,857
	PY16		2.01	1,832	$700	$1,236	$1,936.07	$1,755	$2,191	-$53	$0	$3,894
	PY17		2.01	1,852	$708	$1,250	$1,957.60	$1,775	$2,216	-$53	$0	$3,937
Program Total		1	2.01	9,073	3,467	$6,124	$9,590.30	$8,694	$10,855	-$261	$0	$19,288
Residential Behavioral Efficiency	PY13		1.41	0	$0	$962	$962.05	$338	$1,015	$0	$0	$1,354
	PY14		1.41	0	$0	$1,128	$1,127.92	$397	$1,190	$0	$0	$1,587
	PY15		1.41	0	$0	$1,145	$1,144.51	$403	$1,208	$0	$0	$1,610
	PY16		1.41	0	$0	$962	$962.05	$338	$1,015	$0	$0	$1,354
	PY17		1.41	0	$0	$813	$812.77	$286	$858	$0	$0	$1,144
Program Total		1	1.41	0	0	$5,009	$5,009.29	$1,762	$5,286	$0	$0	$7,049
Low Income Behavioral Efficiency	PY13		1.15	0	$0	$259	$258.70	$69	$228	$0	$0	$296
	PY14		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY15		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY16		1.15	0	$0	$139	$139.30	$37	$123	$0	$0	$160
	PY17		1.15	0	$0	$159	$159.20	$42	$140	$0	$0	$182
Program Total		1	1.15	0	0	$836	$835.81	$222	$735	$0	$0	$957.650

Portfolio	NTGR & TRC			TRC Costs by Program Year ($000)				TRC Benefits By Program Per Year ($000)				
	Program			Measure Cost								
Program	Year	NTGR	TRC	Paid by EDC	Paid by Participants	Program Admin Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel / Water Benefits	O&M Benefits	Total TRC Benefits
Small-Medium Nonresidential Efficiency	PY13		2.16	2,110	$4,196	$2,264	$6,678	$5,751	$9,227	-$527	$0	$14,451
	PY14		2.16	2,342	$4,658	$2,513	$7,413	$6,384	$10,241	-$585	$0	$16,040
	PY15		2.16	2,677	$5,324	$2,873	$8,474	$7,297	$11,707	-$669	$0	$18,336
	PY16		2.16	2,994	$5,955	$3,213	$9,477	$8,161	$13,093	-$748	$0	$20,506
	PY17		2.16	2,499	$4,970	$2,681	$7,909	$6,811	$10,927	-$624	$0	$17,114
Program Total		0.823	2.16	12,623	25,103	$13,543	$39,951	34,404	55,196	-3,154	0	$86,447
Large Commercial Downstream Incentives	PY13		2.49	579	$2,444	$798	$3,241.37	$2,865	$5,403	-$189	$0	$8,079
	PY14		2.49	675	$2,851	$931	$3,781.60	$3,342	$6,304	-$220	$0	$9,426
	PY15		2.49	868	$3,666	$1,196	$4,862.06	$4,297	$8,105	-$283	$0	$12,119
	PY16		2.49	1,061	$4,480	$1,462	$5,942.51	$5,252	$9,906	-$346	$0	$14,812
	PY17		2.49	675	$2,851	$931	$3,781.60	$3,342	$6,304	-$220	$0	$9,426
Program Total		0.899	2.49	3,859	16,291	$5,318	$21,609.14	$19,097	$36,020	-$1,257	$0	$53,860.19
Public Agency Partnership	PY13		2.23	1,311	$1,442	$685	$2,127.56	$1,655	$3,203	-$112	$0	$4,746
	PY14		2.23	1,602	$1,763	$838	$2,600.36	$2,023	$3,915	-$137	$0	$5,801
	PY15		2.23	1,675	$1,843	$876	$2,718.55	$2,114	$4,093	-$143	$0	$6,065
	PY16		2.23	1,602	$1,763	$838	$2,600.36	$2,023	$3,915	-$137	$0	$5,801
	PY17		2.23	1,092	$1,202	$571	$1,772.97	$1,379	$2,670	-$93	$0	$3,955
Program Total		0.899	2.23	7,282	8,012	$3,808	$11,819.80	$9,193	$17,797	-$621	$0	$26,369
Large Industrial Downstream Incentives	PY13		4.17	1,037	$522	$566	$1,088.41	$1,423	$3,129	-$15	$0	$4,537
	PY14		4.17	1,747	$880	$954	$1,833.32	$2,396	$5,271	-$26	$0	$7,642
	PY15		4.17	2,232	$1,124	$1,218	$2,342.22	$3,061	$6,734	-$33	$0	$9,763
	PY16		4.17	2,424	$1,221	$1,323	$2,543.94	$3,325	$7,314	-$36	$0	$10,604
	PY17		4.17	2,656	$1,337	$1,449	$2,786.58	$3,642	$8,012	-$39	$0	$11,615
Program Total		0.899	4.17	10,096	5,084	$5,511	$10,594.47	$13,848	$30,460	-$148	$0	$44,160
All Programs	PY13	1	1.74	8,151	17,107	8,099	25,315	16,146	28,887	-894	0	44,139
	PY14	1	1.82	9,571	19,084	9,152	28,358	18,720	33,989	-1,019	0	51,690
	PY15	1	1.89	10,714	21,052	10,161	31,358	21,431	39,052	-1,179	0	59,304
	PY16	1	1.93	11,401	22,676	10,718	33,559	23,439	42,590	-1,319	0	64,710
	PY17	1	1.88	10,306	19,786	9,458	29,343	19,894	36,284	-1,030	0	55,149
Portfolio Total			1.86	50,143	99,706	47,587	147,933	99,631	180,802	-5,440	0	274,993

12. Sector Programs Schedules & Milestones

Chart 1: Program Schedule Summary – Residential Portfolio Programs

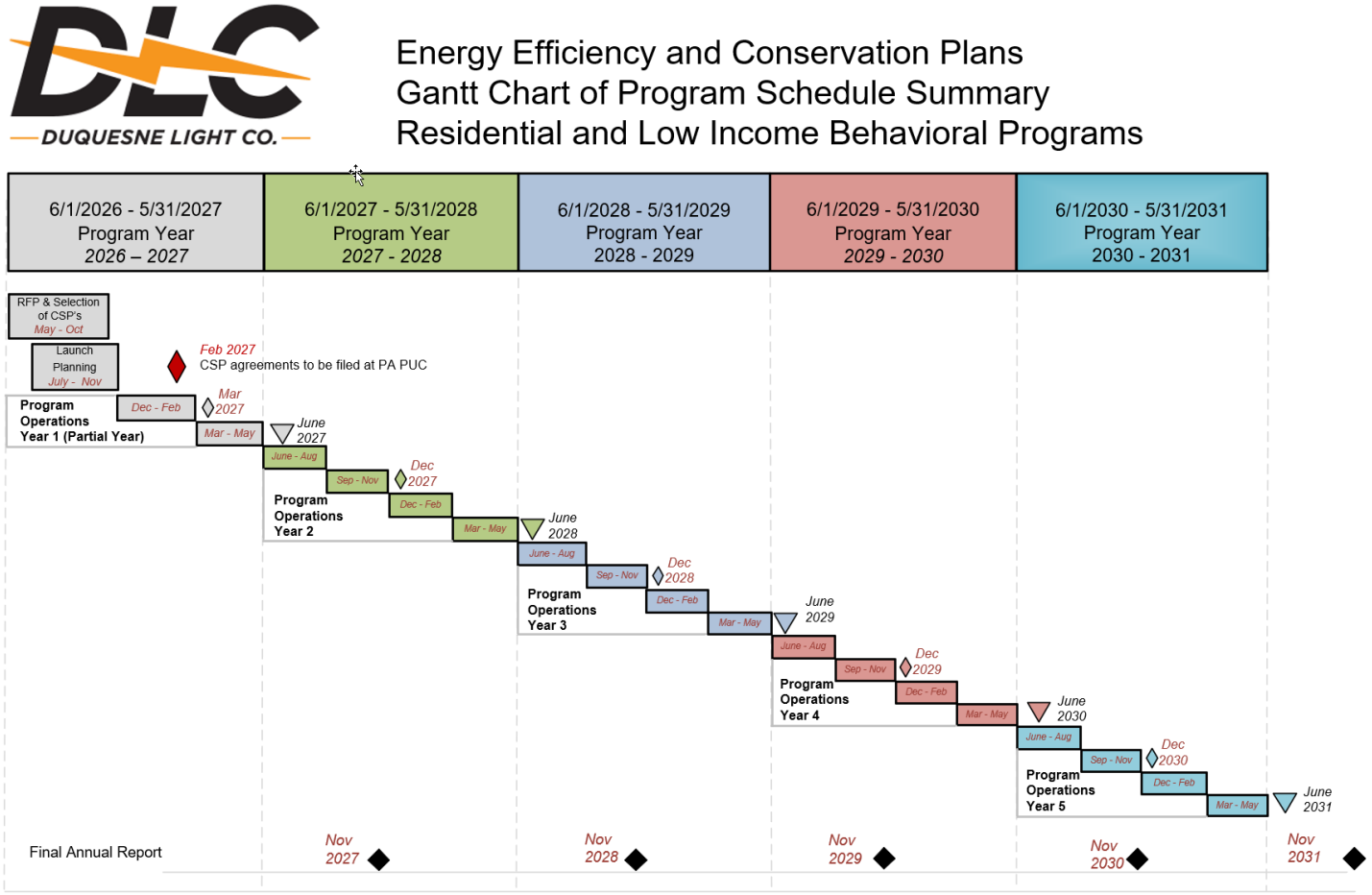


Assumptions:

Duquesne Light will file the Act 129 Phase V EE&C Plan by November 30, 2025
PA PUC approval by March 2026

Note: Program Year Ending May 31

Chart 2: Program Schedule Summary – Residential & Low-Income Behavioral Programs

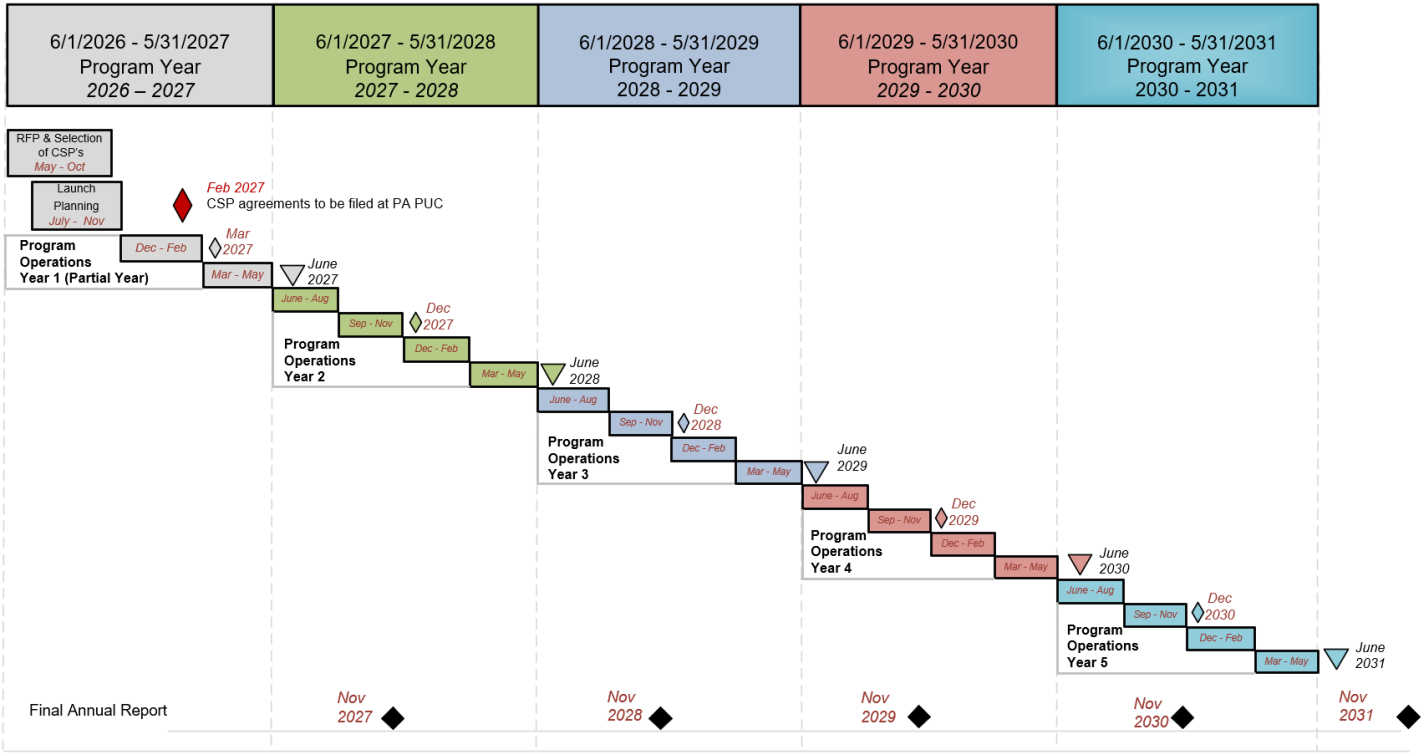


Assumptions:

Duquesne Light will file the Act 129 Phase V EE&C Plan by November 30, 2025
PA PUC approval by March 2026

Note: Program Year Ending May 31

Chart 3: Program Schedule Summary – Small Commercial and Industrial Portfolio Programs

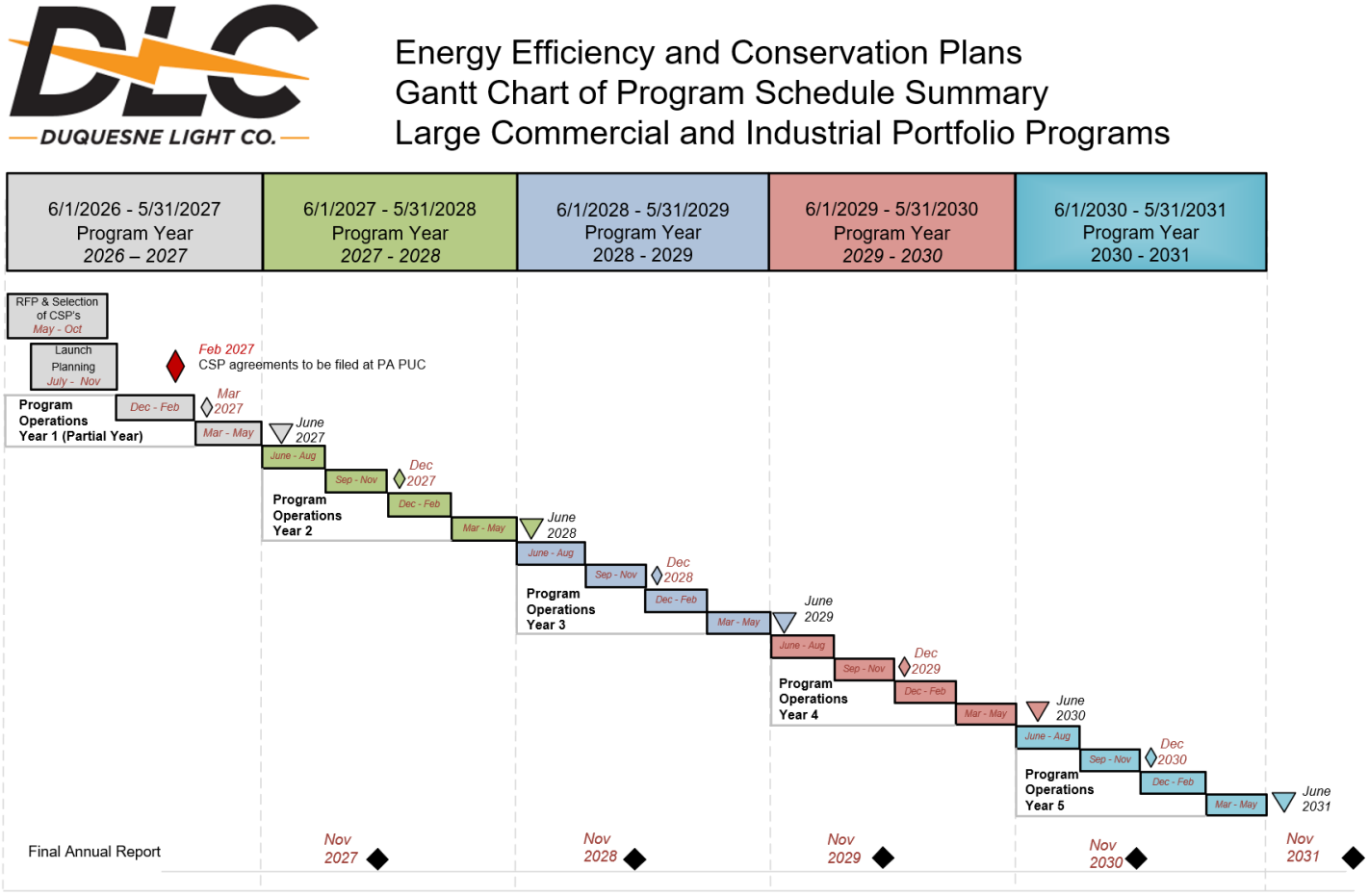


Assumptions:

Duquesne Light will file the Act 129 Phase V EE&C Plan by November 30, 2025
PA PUC approval by March 2026

Note: Program Year Ending May 31

Chart 4: Program Schedule Summary – Large Commercial and Industrial Portfolio Programs



Assumptions:

Duquesne Light will file the Act 129 Phase V EE&C Plan by November 30, 2025
PA PUC approval by March 2026

Note: Program Year Ending May 31

13. CSP Agreement (CONFIDENTIAL)

Guidehouse's Phase V CSP Agreement filed separately due to confidentiality.

14. Avoided Cost Calculator

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator
This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references. For Phase V, the start year shall be set to Program Year 18 (6/1/2026/5/31/2027). The user shall gather publicly available data sets as inputs. This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

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

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

Monetary Issues:	All output dollars are nominal

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

Summary of Avoided Energy Cost Methodology

Years 1-4

1. NYMEX Electricity Futures Price at PJM West Hub
2. Apply Locational Basis Adjustment from PJM West Hub to Operating Company Zone

Years 5 - 10

1. NYMEX Natural Gas Futures Price at Henry Hub with Locational Adjustment
2. EIA AEO Natural Gas Price Forecast for Mid-Atlantic Region
3. Blend NYMEX and EIA AEO Natural Gas Price Forecast over 6 Year Period
4. Convert Gas Price to Electricity Price using On-Peak and Off-Peak Plant Heat Rates
5. Add Spark Spread

Years 11 - 20

1. EIA AEO Natural Gas Price Forecast for Mid-Atlantic Region
2. Convert Gas Price to Electricity Price using On-Peak and Off-Peak Plant Heat Rates
3. Add Spark Spread

General		
Company Name	DLC	
Start Year (Program)	18	2026
Discount Rate	5%	TRC Test Order A.4 page 10
Inflation Rate	2%	TRC Test Order B.4 page 18

Plant Specifications		
	Heat Rate (Btu/kWh)	
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17

EDC Natural Gas Futures Source		
Electric Distribution Companies	**EDC Abbreviation**	**NYMEX NG Futures Source**
Duquesne Light Co	DLC	Tetco M-3
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)
PECO Energy Co	PECO	Transco 6 (Non-NY)
Pennsylvania Electric Co	Penelec	Tetco M-3
Pennsylvania Power Co	Penn Power	Tetco M-3
PPL Utilities	PPL	Transco 6 (Non-NY)
West Penn Power Co	West Penn	Tetco M-3

Seasonal Definitions	
Jan	Winter
Feb	Winter
Mar	Shoulder
Apr	Shoulder
May	Summer
Jun	Summer
Jul	Summer
Aug	Summer
Sep	Summer
Oct	Shoulder
Nov	Shoulder
Dec	Winter

Calendar			
Act 129 PY	**PY Start**	**PY End**	**Avoided Energy YR**
18	2026	2027	2027
19	2027	2028	2028
20	2028	2029	2029
21	2029	2030	2030
22	2030	2031	2031
23	2031	2032	2032
24	2032	2033	2033
25	2033	2034	2034
26	2034	2035	2035
27	2035	2036	2036
28	2036	2037	2037
29	2037	2038	2038
30	2038	2039	2039
31	2039	2040	2040
32	2040	2041	2041
33	2041	2042	2042
34	2042	2043	2043
35	2043	2044	2044
36	2044	2045	2045
37	2045	2046	2046
38	2046	2047	2047
39	2047	2048	2048
40	2048	2049	2049
41	2049	2050	2050
42	2050	2051	2051
43	2051	2052	2052
44	2052	2053	2053
45	2053	2054	2054
46	2054	2055	2055
47	2055	2056	2056

Output (non-Low-Income)

		DLC Zone Summer ($/MWh)		DLC Zone Winter ($/MWh)		DLC DLC Zone Shoulder ($/MWh)		DLC Generation Capacity ($/kW/year)		DLC Transmission Capacity ($/kW/year)		DLC Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2026	$88.30	$59.27	$91.75	$80.40	$74.35	$63.24	$72.59	$72.59	$61.07	$0.00	$59.28	$0.21	$3.92	Segment 1
19	2027	$98.32	$68.77	$106.29	$94.75	$85.26	$73.51	$46.05	$46.05	$62.54	$0.00	$64.43	$0.12	$4.01	
20	2028	$106.23	$76.51	$115.43	$103.05	$92.17	$80.32	$46.97	$46.97	$64.06	$0.00	$69.93	$0.18	$3.88	
21	2029	$105.44	$76.48	$115.23	$102.83	$91.14	$79.49	$48.05	$48.05	$65.61	$0.00	$76.21	$0.18	$3.79	
22	2030	$71.85	$43.16	$80.10	$69.01	$58.32	$47.58	$35.61	$35.61	$67.20	$0.00	$81.30	$0.29	$3.63	Segment 2
23	2031	$71.72	$43.12	$78.58	$68.02	$57.49	$47.06	$36.47	$36.47	$68.83	$0.00	$83.27	$0.29	$3.55	
24	2032	$71.96	$43.33	$80.84	$69.62	$58.06	$47.50	$37.36	$37.36	$70.49	$0.00	$85.29	$0.30	$3.62	
25	2033	$74.47	$45.12	$84.82	$72.41	$60.50	$49.23	$38.26	$38.26	$72.20	$0.00	$87.35	$0.31	$3.86	
26	2034	$77.20	$47.04	$89.23	$75.50	$63.33	$51.23	$39.19	$39.19	$73.95	$0.00	$89.47	$0.32	$4.14	
27	2035	$79.69	$48.81	$93.06	$78.18	$65.96	$53.09	$40.14	$40.14	$75.74	$0.00	$91.63	$0.32	$4.38	
28	2036	$81.77	$50.29	$96.25	$80.43	$68.03	$54.57	$41.11	$41.11	$77.57	$0.00	$93.85	$0.33	$4.58	Segment 3
29	2037	$81.71	$50.30	$95.87	$80.22	$67.96	$54.56	$42.10	$42.10	$79.45	$0.00	$96.13	$0.34	$4.55	
30	2038	$81.12	$49.95	$94.21	$79.13	$67.29	$54.16	$43.12	$43.12	$81.37	$0.00	$98.45	$0.35	$4.46	
31	2039	$80.72	$49.73	$93.00	$78.35	$66.84	$53.90	$44.17	$44.17	$83.34	$0.00	$100.84	$0.36	$4.38	
32	2040	$81.14	$50.07	$93.77	$78.94	$67.28	$54.27	$45.24	$45.24	$85.36	$0.00	$103.28	$0.36	$4.41	
33	2041	$82.44	$51.02	$96.64	$80.97	$68.69	$55.29	$46.33	$46.33	$87.43	$0.00	$105.78	$0.37	$4.55	
34	2042	$83.87	$52.07	$99.83	$83.22	$70.24	$56.41	$47.45	$47.45	$89.55	$0.00	$108.34	$0.38	$4.71	
35	2043	$85.35	$53.14	$103.11	$85.54	$71.83	$57.57	$48.60	$48.60	$91.71	$0.00	$110.96	$0.39	$4.87	
36	2044	$86.35	$53.90	$105.26	$87.08	$72.92	$58.38	$49.78	$49.78	$93.94	$0.00	$113.65	$0.40	$4.97	
37	2045	$87.13	$54.49	$106.85	$88.24	$73.75	$59.01	$50.99	$50.99	$96.21	$0.00	$116.40	$0.41	$5.05	

Output – Low-Income

		DLC Zone Summer ($/MWh)		DLC Zone Winter ($/MWh)		DLC DLC Zone Shoulder ($/MWh)		DLC Generation Capacity ($/kW/year)		DLC Transmission Capacity ($/kW/year)		DLC Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2026	$106.97	$77.94	$110.42	$99.07	$93.02	$81.91	$72.59	$72.59	$61.07	$0.00	$59.28	$0.21	$3.92	Segment 1
19	2027	$117.36	$87.81	$125.33	$113.80	$104.31	$92.55	$46.05	$46.05	$62.54	$0.00	$64.43	$0.12	$4.01	
20	2028	$125.65	$95.94	$134.86	$122.47	$111.60	$99.74	$46.97	$46.97	$64.06	$0.00	$69.93	$0.18	$3.88	
21	2029	$125.26	$96.29	$135.05	$122.64	$110.96	$99.30	$48.05	$48.05	$65.61	$0.00	$76.21	$0.18	$3.79	
22	2030	$92.06	$63.37	$100.31	$89.22	$78.53	$67.79	$35.61	$35.61	$67.20	$0.00	$81.30	$0.29	$3.63	Segment 2
23	2031	$92.33	$63.74	$99.19	$88.63	$78.10	$67.67	$36.47	$36.47	$68.83	$0.00	$83.27	$0.29	$3.55	
24	2032	$92.98	$64.36	$101.87	$90.65	$79.09	$68.53	$37.36	$37.36	$70.49	$0.00	$85.29	$0.30	$3.62	
25	2033	$95.92	$66.56	$106.27	$93.86	$81.94	$70.67	$38.26	$38.26	$72.20	$0.00	$87.35	$0.31	$3.86	
26	2034	$99.08	$68.92	$111.11	$97.37	$85.21	$73.10	$39.19	$39.19	$73.95	$0.00	$89.47	$0.32	$4.14	
27	2035	$102.00	$71.12	$115.37	$100.49	$88.28	$75.40	$40.14	$40.14	$75.74	$0.00	$91.63	$0.32	$4.38	
28	2036	$104.53	$73.05	$119.01	$103.19	$90.79	$77.33	$41.11	$41.11	$77.57	$0.00	$93.85	$0.33	$4.58	Segment 3
29	2037	$104.93	$73.52	$119.09	$103.44	$91.17	$77.78	$42.10	$42.10	$79.45	$0.00	$96.13	$0.34	$4.55	
30	2038	$104.80	$73.63	$117.89	$102.81	$90.97	$77.84	$43.12	$43.12	$81.37	$0.00	$98.45	$0.35	$4.46	
31	2039	$104.87	$73.88	$117.15	$102.50	$90.99	$78.05	$44.17	$44.17	$83.34	$0.00	$100.84	$0.36	$4.38	
32	2040	$105.78	$74.71	$118.40	$103.57	$91.92	$78.90	$45.24	$45.24	$85.36	$0.00	$103.28	$0.36	$4.41	
33	2041	$107.57	$76.15	$121.77	$106.10	$93.82	$80.42	$46.33	$46.33	$87.43	$0.00	$105.78	$0.37	$4.55	
34	2042	$109.50	$77.70	$125.46	$108.85	$95.87	$82.04	$47.45	$47.45	$89.55	$0.00	$108.34	$0.38	$4.71	
35	2043	$111.49	$79.28	$129.25	$111.68	$97.97	$83.71	$48.60	$48.60	$91.71	$0.00	$110.96	$0.39	$4.87	
36	2044	$113.02	$80.56	$131.93	$113.75	$99.58	$85.04	$49.78	$49.78	$93.94	$0.00	$113.65	$0.40	$4.97	
37	2045	$114.33	$81.69	$134.05	$115.44	$100.95	$86.21	$50.99	$50.99	$96.21	$0.00	$116.40	$0.41	$5.05	

Period	NYMEX: PJM Western Hub On-peak (Nominal $/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal $/MWh)	DLC Zone Adjusted On-Peak (Nominal $/MWh)	DLC Zone Adjusted Off-Peak (Nominal $/MWh)
Sep-25	$47.49	$30.75	$47.57	$30.80
Oct-25	$50.95	$36.35	$51.03	$36.41
Nov-25	$48.50	$39.35	$48.58	$39.41
Dec-25	$56.65	$46.65	$56.74	$46.72
Jan-26	$78.55	$66.20	$78.67	$66.30
Feb-26	$67.85	$56.50	$67.96	$56.59
Mar-26	$50.20	$41.95	$50.28	$42.02
Apr-26	$50.65	$38.90	$50.73	$38.96
May-26	$52.35	$34.25	$52.43	$34.30
Jun-26	$59.00	$35.15	$59.09	$35.21
Jul-26	$88.10	$44.60	$88.24	$44.67
Aug-26	$75.75	$38.40	$75.87	$38.46
Sep-26	$57.90	$35.80	$57.99	$35.86
Oct-26	$55.10	$41.05	$55.19	$41.11
Nov-26	$54.80	$44.50	$54.89	$44.57
Dec-26	$63.80	$53.50	$63.90	$53.58
Jan-27	$87.00	$72.70	$87.14	$72.81
Feb-27	$74.35	$63.50	$74.47	$63.60
Mar-27	$52.35	$44.10	$52.43	$44.17
Apr-27	$52.40	$39.30	$52.48	$39.36
May-27	$52.55	$34.25	$52.63	$34.30
Jun-27	$59.25	$34.75	$59.34	$34.80
Jul-27	$88.15	$43.15	$88.29	$43.22
Aug-27	$77.05	$39.70	$77.17	$39.76
Sep-27	$57.55	$35.20	$57.64	$35.26
Oct-27	$56.10	$40.05	$56.19	$40.11
Nov-27	$54.65	$45.10	$54.74	$45.17
Dec-27	$63.25	$53.85	$63.35	$53.94
Jan-28	$84.20	$72.40	$84.33	$72.51
Feb-28	$78.10	$65.45	$78.22	$65.55
Mar-28	$52.85	$43.95	$52.93	$44.02
Apr-28	$51.60	$38.25	$51.68	$38.31
May-28	$52.40	$35.75	$52.48	$35.81
Jun-28	$58.20	$34.95	$58.29	$35.01
Jul-28	$89.00	$41.90	$89.14	$41.97
Aug-28	$78.15	$38.60	$78.27	$38.66
Sep-28	$57.05	$35.25	$57.14	$35.31
Oct-28	$52.00	$39.20	$52.08	$39.26
Nov-28	$55.25	$42.95	$55.34	$43.02
Dec-28	$66.15	$53.50	$66.25	$53.58
Jan-29	$85.25	$71.60	$85.38	$71.71
Feb-29	$78.60	$65.00	$78.72	$65.10
Mar-29	$53.20	$48.00	$53.28	$48.08
Apr-29	$52.10	$38.50	$52.18	$38.56
May-29	$53.95	$36.90	$54.04	$36.96
Jun-29	$58.15	$36.10	$58.24	$36.16
Jul-29	$90.30	$43.35	$90.44	$43.42
Aug-29	$78.20	$39.80	$78.32	$39.86
Sep-29	$56.35	$36.20	$56.44	$36.26
Oct-29	$51.70	$36.85	$51.78	$36.91
Nov-29	$55.45	$42.55	$55.54	$42.62
Dec-29	$67.65	$57.75	$67.76	$57.84