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December 1, 2023

VIA E-FILING

Sherri L. Golden
Secretary
Board of Public Utilities
44 South Clinton Avenue
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Trenton, NJ 08625-0350

Re: In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs (JCP&L EE&C II) - BPU Docket No. _____

Dear Secretary Golden:

We represent Jersey Central Power & Light ("JCP&L" or the "Company") in the above-captioned proceeding. Attached for filing, please find the following:

(1) Verified Petition (with MFR index);

(2) Testimony of Edward C. Miller (EE&C Plan II Description, Budgets, Reporting);

(3) Testimony of Carol Pittavino (Cost Recovery Mechanism, Revenue Requirements, Rate Filings, Bill Impacts); and

(4) Testimony of Brendon J. Baatz of Gabel Associates, Inc. (Benefit-Cost Analysis).

This filing is being made in compliance with the Board's May 24, 2023, July 26, 2023, and October 25, 2023 Orders directing New Jersey's utilities to propose second triennium energy efficiency and peak demand reduction programs.[1]

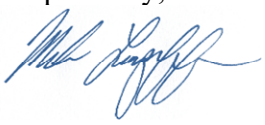
[1] *See In the Matter of the Implementation of P.L. 2018, C. 17, The New Jersey Clean Energy Act of 2018, Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, et al.*, BPU

This filing is being electronically filed with the Secretary and served by e-mail upon the attached service list pursuant to the Board's March 19, 2020 Order regarding the COVID-19 pandemic (Docket No. EO20030254). No paper copies will follow.

JCP&L is submitting both public and confidential versions of this filing. In an effort to provide a comprehensive filing, the confidential version includes confidential workpapers that typically would not be provided until discovery. The Company has redacted the confidential workpapers in the public version of the filing.

Please do not hesitate to contact me if you have any questions.

Respectfully,



Mark A. Lazaroff

MAL/tp
Enclosures

c: Per Service List (w/encls., via e-mail unless otherwise noted)

Docket Nos. QO19010040, QO23030150, and QO17091004, Order Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs (May 24, 2023); *In the Matter of the Implementation of P.L. 2018, C. 17, The New Jersey Clean Energy Act of 2018, Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, et al*., BPU Docket Nos. QO19010040, QO23030150, and QO17091004, Order Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs (July 26, 2023); *In the Matter of the Implementation of P.L. 2018, C. 17, The New Jersey Clean Energy Act of 2018, Regarding the Second Triennium of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket No. QO23030150, Order (October 25, 2023).

In the Matter of the Verified Petition of Jersey Central Power & Light Company For
Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy and
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BPU Docket No. _____

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EXHIBIT JC-1

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey Central Power & Light Company For Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs ("JCP&L EE&C Plan II Filing")	:	BPU Docket No. **VERIFIED PETITION**

TO THE HONORABLE BOARD OF PUBLIC UTILITIES:

Petitioner, Jersey Central Power & Light Company ("JCP&L" or the "Company"), an electric public utility company of the State of New Jersey, subject to the regulatory jurisdiction of the New Jersey Board of Public Utilities (the "BPU" or the "Board"), and maintaining principal offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911, and 101 Crawfords Corner Road, Building 1, Suite 1-511, Holmdel, New Jersey 07733, respectfully submits this Verified Petition (the "Petition) and states:

INTRODUCTION

1. JCP&L is a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution, and sale of electric energy and related utility services to more than one million residential, commercial, and industrial customers located within 13 counties and 236 municipalities of the State of New Jersey.

2. JCP&L files this Petition to seek approval of its Triennium 2 Energy Efficiency and Conservation Plan ("EE&C Plan II" or the "Plan"), which consists of a portfolio of energy efficiency ("EE"), peak demand reduction ("PDR"), and building decarbonization ("BD") programs for the 2.5-year period starting January 1, 2025 and ending June 30, 2027 ("Triennium 2"), as well as approval of its associated cost recovery mechanism.

3. EE&C Plan II follows JCP&L's successful implementation of the EE and PDR programs and the associated cost recovery mechanism approved by the Board in Docket Nos. QO19010040 and EO20090620 ("EE&C Plan I").[1]

4. This Petition is filed in compliance with the Board's Orders Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs, Docket Nos. QO19010040, QO23030150, and QO17091004, dated May 24, 2023 (the "May 24 Order") and July 26, 2023 (the "July 26 Order," collectively, the "Orders"). The Orders directed each electric and gas utility to submit program filings for Triennium 2 compliant with the minimum filing requirements ("MFRs") set forth in the Orders by October 2, 2023.

5. On September 27, 2023, the Board extended the deadline for submission of the program filings to December 1, 2023.[2]

6. EE&C Plan II consists of ten EE programs, one PDR program, and one BD program, which are designed to achieve the targeted annual energy savings for Triennium 2 and to increase EE and reduce peak demand in all sectors of the economy. Savings opportunities are offered to JCP&L's entire customer base of residential, multifamily, and commercial and industrial customers, with specific opportunities for low- and moderate-income, multi-family, small business, and local government customers.

7. This Petition attaches the testimony of three witnesses: (1) Edward C. Miller, Manager, Compliance & Development, FirstEnergy Service Company; (2) Carol A. Pittavino, Manager, NJ Rates & Regulatory Affairs, FirstEnergy Service Company; and (3) Brendon J. Baatz,

[1] *I/M/O the Verified Petition of Jersey Central Power & Light Company for Approval of JCP&L's Energy Efficiency and Conservation Plan Including Energy and Peak Demand Reduction Programs (JCP&L EE&C)*, Docket Nos. QO19010040 and EO020090620, Order Adopting Stipulation (Apr. 27, 2021).

[2] *I/M/O the Implementation of P.L. 2018, c. 17, the New Jersey Clean Energy Act of 2018, Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs*, Docket Nos. QO19010040, QO23030150, QO17091004, Order Designating Commissioner, Setting Manner of Service and Bar Dates (Sep. 27, 2023) (the "September 27 Order").

Vice President, Gabel Associates, Inc. Mr. Miller's testimony addresses how JCP&L's proposed EE, PDR, and BD programs further the State's goals of implementing EE, PDR, and BD measures and providing access to such measures to low- and moderate-income customers. Mr. Miller's testimony further addresses associated MFRs. Ms. Pittavino's testimony addresses JCP&L's proposed cost recovery mechanism and associated MFRs. Mr. Baatz's testimony addresses the benefit-cost analyses demonstrating that EE&C Plan II is cost effective on an overall portfolio basis, and his testimony also addresses associated MFRs.

8. Appendix A to this Petition identifies the location in this filing of all information required by the MFRs.

BACKGROUND

9. On May 23, 2018, the Clean Energy Act of 2018 ("CEA") was signed into law. The CEA, among other things, established aggressive energy reduction requirements and directed New Jersey's electric public utilities to achieve energy reductions through their customers.

10. EE is one of seven key strategies identified in New Jersey's 2020 Energy Master Plan, which adopted the goal of having New Jersey's energy customers utilizing 100% clean energy by 2050 to provide immediate and long-term energy cost reductions and improve health and safety for all households.

11. On February 15, 2023, Governor Murphy signed Executive Order No. 315, accelerating the State's clean energy goal to 100% by 2035. On the same day, the Governor executed Executive Order No. 316, establishing a State policy to advance the electrification of commercial and residential buildings.

12. Board Staff released straw proposals and held public stakeholder meetings on April 6 and April 18, 2023, on the following topics related to the Triennium 2 EE framework: program administration and design, filing and reporting requirements, cost recovery, EE as a resource, and

evaluation, measurement, and verification. Stakeholders were invited to provide written comments on these topics by April 28, 2023. By the May 24 Order, the Board approved the above-referenced aspects of the Triennium 2 EE framework, adopting many of Board Staff's proposals.

13. Board Staff released straw proposals on June 7, 2023, and held two public stakeholder meetings on June 20, 2023, on the following remaining topics related to the Triennium 2 EE framework: goals, targets, performance incentive mechanism, energy savings carryover, BD start-up programs, and demand response programs. Stakeholders were invited to provide written comments on these topics by June 27, 2023. By the July 26 Order, the Board approved these remaining aspects of the Triennium 2 EE framework, adopting many of Board Staff's proposals.

14. The Orders directed the utilities to submit three-year program filings compliant with the MFRs by October 2, 2023, for approval by the Board by May 1, 2024, and implementation beginning July 1, 2024.

15. By the September 27 Order, the Board extended the deadline for submitting three-year program filings compliant with the MFRs to December 1, 2023.

16. By Order dated October 25, 2023 (the "October 25 Order"), the Board directed each utility to file a petition extending the end date of its Triennium 1 programs by six months from June 30, 2024 to December 30, 2024.[3] In accordance, the Board extended the start date of Triennium 2 to January 1, 2025. The Board, however, maintained the end date of Triennium 2 of June 30, 2027, resulting in a total term of 2.5 years for Triennium 2. The Board clarified that the first program year ("PY") of Triennium 2, PY4, would be for an abbreviated period of six months,

[3] *I/M/O the Implementation of P.L. 2018, c. 17, the New Jersey Clean Energy Act of 2018, Regarding the Second Triennium of Energy Efficiency and Peak Demand Reduction Programs*, Docket No. QO23030150, Order (Oct. 25, 2023).

commencing on January 1, 2025 and ending on June 30, 2025. The Board also updated State- and utility-specific net annual energy reduction targets for Triennium 2.

17. The Company's proposed expenditures in EE&C Plan II implement requirements of the CEA and comply with the MFRs adopted by the Board in the Orders.

18. An initial pre-filing meeting between the Company, Board Staff, and Rate Counsel was held on September 14, 2023.

19. A second pre-filing meeting between the Company, Board Staff, and Rate Counsel was held on November 28, 2023.

EE&C PLAN II

20. EE&C Plan II provides for significant expenditures in EE, PDR, and BD programs over the course of Triennium 2. The projected budgets for each program in that time frame are as follows:

JCP&L Summary of Program Cost PY2025 to PY2027			
Program	**Admin O&M ($)**	**Investment ($)**	**Total ($)**
Whole Home	$3,664,612	$100,973,834	$104,638,446
Income Qualified	$3,197,117	$53,568,708	$56,765,825
Energy Efficient Products	$2,693,236	$88,454,179	$91,147,416
Behavioral	$438,305	$6,358,658	$6,796,963
Residential Total	**$9,993,271**	**$249,355,379**	**$259,348,649**
Energy Solutions	$11,566,927	$268,290,661	$279,857,588
Prescriptive / Custom	$6,767,453	$190,982,372	$197,749,825
Direct Install	$5,071,208	$135,110,322	$140,181,530
Commercial & Industrial Total	**$23,405,588**	**$594,383,356**	**$617,788,944**
Multifamily	$279,513	$9,529,329	$9,808,842
Multifamily Total	**$279,513**	**$9,529,329**	**$9,808,842**
Next Generation Savings	$2,246,505	$5,567,464	$7,813,969
CVR	$187,500	$40,000	$227,500
Building Decarbonization	$1,736,180	$43,470,398	$45,206,578
Load Optimization & PDR	$910,726	$20,923,553	$21,834,279
Additional Utility Programs Total	**$5,080,911**	**$70,001,415**	**$75,082,326**
Workforce Development	$1,500,000	$0	$1,500,000
Outreach to Community-based Orgs.	$625,000	$0	$625,000
Other Portfolio Costs Total	**$2,125,000**	**$0**	**$2,125,000**
Portfolio Total	**$40,884,283**	**$923,269,478**	**$964,153,761**

21. The programs of EE&C Plan II are summarized in the following table:

Table 2: Program Portfolio Plan Summary		
Program	**Program Type**	**Description**
Residential Programs		
Whole Home	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to market rate customers.
Income Qualified	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to income-qualified customers. Includes two pathways (moderate income and low income, i.e. Comfort Partners) with tiered benefits, based on household income and other qualifying factors
Energy Efficient Products	Core Utility	Provides incentives for HVAC, appliances, appliance recycling, consumer electronics, and other energy-saving equipment through a variety of channels.
Behavioral	Core Utility	Provides energy use information, including analytics, and information and tips related to energy conservation via digital and/or mailed reports to residential customers
Commercial & Industrial Programs		
Energy Solutions	Core Utility	Comprehensive program offering various whole-building solutions to energy efficiency upgrades, including energy assessments, engagement, comprehensive services and technical support.
Prescriptive / Custom	Core Utility	Provides opportunities for commercial and industrial facilities to implement individual or groups of efficiency measures based on prescriptive rebates and/or per kwh and per therm financial incentives for custom measures
Direct Install	Core Utility	Provides an energy assessment and financial incentives for the direct installation of energy efficiency measures; the program aims to make energy efficiency upgrades more accessible to small commercial customers
Multifamily		
Multifamily	Core Utility	Provides a variety of options for multifamily properties, to fulfill the needs of this diverse customer segment, including financial incentives for in unit or common areas energy efficiency solutions as well as more comprehensive offerings, such as but not limited to direct install whole-building retrofits.
Additional Utility		
Next Generation Savings	Additional Utility	Targets new technologies and approaches that need training, incentives, or other key elements to help the marketplace understand the value proposition and implement the measure
CVR	Additional Utility	Program that performs engineering analysis to identify and select, and implements, monitors and maintains the reduction of voltage at select Company substations and distribution circuits to reduce customer energy consumption and demand
Building Decarbonization	Additional Utility	Provides rebates for, and financial incentives for the direct installation of, electrification of building heating, water heating, cooking equipment and potentially other measures as applicable protocols are established or in coordination with other utilities
Load Optimization & PDR	Additional Utility	Targets energy and peak demand savings through Behavioral and Load Control components. Behavioral targets customers with smart meters to reduce load through advance notification and post-event feedback. Load Control targets customer connected devices in homes and businesses, including smart thermostats and potentially other measures, to achieve energy and peak demand savings.

22. As presented in the above table, EE&C Plan II includes a comprehensive portfolio of EE, PDR, and BD programs for the residential, commercial and industrial, and multifamily sectors, including Company initiatives as part of the "Additional Utility Led" section of the Plan. The Plan thus provides opportunities for all customer classes to participate in EE programs. It incorporates both near- and long-term energy savings opportunities for customers, including single, prescriptive, and custom measures, direct install, and comprehensive whole building solutions. The Plan is also designed to address both educational and initial cost barriers and to tap a variety of delivery channels and vendors to support customer engagement, education, and participation. It includes not only direct or targeted programs that engage customers—including

specific opportunities that ensure access for all customers—but also serves as a portal for other program offerings by educating customers about EE and informing them about other program services and opportunities upon which they can act. The programs incorporate strategies to change behaviors and include incentives and access to financing to address initial cost barriers and to promote the participation of all customers. The programs also provide opportunities for customers interested in whole building/comprehensive solutions and encourage customers in all sectors to consider a holistic approach to EE. Finally, the programs support the State's vision for achieving 100% clean energy by 2035 by working to reduce customers' energy bills, create "green" jobs, and lower greenhouse gas emissions, all while improving the overall utility experience for customers.

23. More detailed descriptions of the programs are provided in Section 3.0 of EE&C Plan II, which is Attachment A to Mr. Miller's testimony.

24. The projected energy savings for EE&C Plan II for Triennium 2 are summarized in the table below:

Table 3: Portfolio Plan Projections				
	Energy Efficiency		Demand Response	Building Decarbonization
Program Year[1]	KWh Savings	KW Savings	KW Savings	Source MMBTU Savings
2025	138,480,934	29,249	22,891	3,661
2026	314,264,044	66,405	35,595	14,560
2027	313,250,697	67,331	48,900	14,481
Total	**765,995,675**	**162,985**	**107,387**	**32,701**

[1] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

Projections of participation and savings by program year for each EE, PDR, and BD program are provided in Appendix A of the Plan.

25. The total budget for EE&C Plan II over the course of Triennium 2 is $964.2 million (the "Total Budget"), consisting of $923.3 million in investment and $40.9M in expenses.

26. EE&C Plan II will have a maximum cumulative bill impact over Triennium 2 for the typical residential customer using 783 kilowatt-hours ("kWh") per month over the entire 2.5-year program period of approximately $4.86, or about 4.2% of the current average monthly bill.

27. The portfolio of programs in EE&C Plan II achieves a 2.5 benefit-to-cost ratio with the New Jersey Cost Test, which exceeds the 1.0 minimum benefit- to-cost ratio required by the MFRs. Other benefit-to-cost analyses results are provided in Appendix E of the Plan. These analyses are described in detail in Mr. Baatz's testimony.

28. The portfolio of programs in EE&C Plan II is expected to meet the energy savings targets established for JCP&L in the October 25 Order for each program year. The metrics of the anticipated quantitative performance indicators to be achieved by the portfolio of programs is provided in Appendix F of the Plan.

29. A reporting plan for Quarterly Progress Reports, Annual Progress Reports, and Triennial Reports is provided in Section 4f of EE&C Plan II.

BUDGET ADJUSTMENT MECHANISM FOR OVERLAPPING SERVICE TERRITORIES

30. For Triennium 2, JCP&L, in conjunction with other utilities, is proposing an adjustment mechanism to coordinate utility budgets and eliminate potential budget constraints such as those experienced during Triennium 1 (the "Budget Adjustment Mechanism"). Budget constraints limit customers' access to EE and disrupt the development of a clean energy economy.

31. The process for managing the budgets in overlapping utility territories in Triennium 1 was inefficient and time consuming. The proposed mechanism will allow for investments to be

made in the overlapping territories without creating the budget constraints and labor-intensive management of the budgets as experienced in Triennium 1.

32. Under the current proposal, JCP&L has developed its own budget for expenditures that it will make in its own and overlapping utility territories when serving as the Lead Utility,[4] which is designed as part of its overall budget to achieve its energy savings targets. JCP&L's budget will include costs for the overlapping utility's fuel source to account for savings achieved by installing EE measures as the Lead Utility.

33. As part of this Petition, JCP&L proposes that it be allowed to recover expenditures in its territory for its fuel source based on the expenditures it makes as the Lead Utility, as well as the costs billed by overlapping utilities in delivery of coordinated projects (the "Net Expenditure"). The Net Expenditure includes the total expenditure by JCP&L less the costs billed to overlapping utilities in delivery of coordinated projects made by JCP&L in the Partner Utility territory, plus the costs paid to the overlapping utilities in delivery of coordinated projects made by the Partner Utility on JCP&L's behalf. The Company's actual Net Expenditure may be either higher than or lower than its approved budget as the Lead Utility.

34. Allowing the recovery of the Net Expenditure, rather than just JCP&L's budget as Lead Utility, ensures that the investment dollars are being recovered from the customers in the utility territory that received the benefit of the investment. This mechanism will eliminate the opportunity for cross-subsidization since the dollars spent and recovered will align with the territory in which the investment was made.

35. This mechanism also helps address the potential budget constraints that may result from the uncertainty of how customers in overlapping service territories will elect to implement

[4] The terms "Lead Utility" and "Partner Utility" are defined in Section 5.0 of EE&C Plan II, which is Attachment A to Mr. Miller's testimony.

dual-fuel EE measures. JCP&L is particularly concerned that without the Budget Adjustment Mechanism, a customer's ability to participate in specific programs could be limited based solely on their location within JCP&L's service territory and the overlapping Partner Utility. The proposed mechanism provides the necessary flexibility to address the challenges of overlapping service territories while also providing structure and limits on cost recovery.

36. As with the current methodology for investments in overlapping territories, the transfer of funds and energy savings will be managed and accomplished through the established Statewide Coordinator system.

37. Allowing a utility to adjust the level of spending in a proceeding has been allowed by the Board in prior instances. For example, the Board has allowed "[f]or prudent changes in investment up to 15% greater than the cumulative investment amount for [a] Program . . . ."[5] In that case, Public Service Electric and Gas Company sought to extend its Solar for All ("S4AEII") program. As part of the stipulation agreed to by Staff and Rate Counsel, among others, there was an acknowledgement that budget adjustments may be necessary due to real market and site conditions. As a result, the stipulation provided for an increase in the cumulative program investment up to 15%. Additionally, investments that would require greater than a 15% increase in cumulative investments required 30-day prior written notification to Staff and Rate Counsel.[6]

38. As in the S4AEII, real market conditions can, and do, affect the location and magnitude of the demand for EE programs. Flexibility to adjust to market conditions is necessary

[5] *I/M/O the Petition of Public Service Electric and Gas Company for Approval of a Second Extension of a Solar Generation Investment Program and Associated Cost Recovery Mechanism and for Changes in the Tariff for Electric Service, B.P.U.N.J. No. 15 Pursuant to N.J.S.A. 48:2-21, 48:2-21.1 and N.J.S.A. 48.3-98.1*, BPU Docket No. EO16050412, Order Approving Stipulation at p. 6, ¶ 20 (Nov. 30, 2016).
[6] *Ibid.*

for these programs to be successful, especially as the utilities promote comprehensive EE solutions for customers in overlapping utility territories.

39. JCP&L requests flexibility in investments similar to the mechanism set forth in S4AEII, which would allow its Net Expenditure to exceed its Total Budget by an amount up to 15%. Additionally, JCP&L will include the actual Net Expenditure as part of its annual rate recovery filings. Notice of an increase in rates, if any, will be provided to customers as part of this annual process.

40. In addition to the annual rate recovery filings, the utilities will submit a joint reconciliation schedule on an annual basis, which will document that spending is within the approved limits.

41. Should the Board reject this proposed Budget Adjustment Mechanism, in the alternative, JCP&L proposes to include a contingency of 15% of its Total Budget. To be clear, however, this alternative approach is not the Company's preferred option and is not reflected in JCP&L's analyses of program costs, benefits, or rate impacts. Instead, this alternative is proposed in the interest of attempting to address the concerns expressed by Board Staff and of working collaboratively with Staff and Rate Counsel to address the uncertainties and complexities of cost recovery limits.

COST RECOVERY

42. As detailed in Ms. Pittavino's testimony, JCP&L proposes to recover the revenue requirement associated with the costs of EE&C Plan II, as well as the lost revenues associated with the Plan, in a similar manner to the Board-approved method for recovering costs associated with EE&C Plan I.

43. The revenue requirement includes all planned investments and expenses related to EE&C Plan II. More specifically, such costs include: incentives (including customer incentives

and financing investments); outside services; and operations and maintenance, including expenses for utility administration (including workforce development), inspections and quality control, marketing (including outreach to community-based organizations), and evaluation.

44. The revenue requirement will be modified by any net revenue offsets from PJM Interconnection LLC capacity resources, marketplace revenues negotiated with vendors, financial benefits from the usage of data, or any other source of revenues resulting from the Plan's implementation.

45. The proposed method of calculating the revenue requirement for EE&C Plan II is set forth in detail in Ms. Pittavino's testimony and is consistent with the Board's Orders. Schedule CAP-3 to her testimony shows the calculation of the revenue requirement for the Plan.

46. Consistent with the July 26 Order, the amortization expense to recover the investment in EE&C Plan II assets is based on a ten-year amortization of such investments.

47. While the July 26 Order adopts Board Staff's recommendation for performance incentives and penalties, they do not phase in until PY6 and are based on PY5 performance. Because EE&C Plan II is developed to achieve Board-established utility targets within the range of compliance during PY6, it does not include an adjustment for performance incentives and penalties for PY6.

48. JCP&L proposes to continue to recover its EE&C Plan II revenue requirements through a new "EE&C2" component set forth in Rider Regional Greenhouse Gas Initiative Recovery Charge ("RRC"). The Company requests that the rates for the first year of EE&C Plan II, PY4 (*i.e.*, January 1, 2025 through June 30, 2025), be approved in this proceeding. The RRC would be subject to annual adjustment filings on February 1 for all Rider RRC components with rates effective July 1 of each year. Each rate filing will address the prior year true-up for actuals

and the projected revenue requirement for the subsequent recovery period to set the new rate. The calculation of the estimated proposed rate adjustments for EE&C Plan II are shown on Schedule CAP-4 to Ms. Pittavino's testimony.

49. The target schedule for JCP&L's annual rate filing is as follows:

JCP&L EE&C Plan Rate Filing Schedule				
Filing	**Filing (On or Before)**	**Projected Spending Through**	**True-Up of Prior Period Actuals**	**Rates Effective**
0 (Initial Rate)	This Petition	June 30, 2025	N/A	January 1, 2025
1	February 1, 2025	June 30, 2026	January 1, 2024 through December 31, 2024	July 1, 2025
2	February 1, 2026	June 30, 2027	January 1, 2025 through December 31, 2025	July 1, 2026

50. The projected revenue requirement for PY4 is currently forecasted to be $16,192,427 including Sales and Use Tax. *See* Schedule CAP-4 attached to Ms. Pittavino's testimony.

51. The proposed rate design for all applicable rate changes to recover EE&C Plan II expenditures is described in Ms. Pittavino's testimony and detailed calculations supporting initial rates are shown in Schedule CAP-4 thereto.

52. Based upon the forecasted rates, the bill impacts for a typical residential customer (as well as rate class average customers) for PY4, PY5, and PY6 are set forth in Schedule CAP-5. The bill impact in the first year of EE&C Plan II, *i.e.*, PY4, for the typical residential customer using 783 kWh per month is an increase of 0.8% or approximately $0.97 per month. The maximum cumulative bill impact on such a residential customer over Triennium 2 is an estimated increase of approximately $4.86, or about 4.2% of the current average monthly bill.

53. JCP&L proposes to continue to recover lost revenues from reduced electricity sales associated with EE&C Plan II by way of the reconcilable tariff clause, Rider Lost Revenue Adjustment Mechanism ("LRAM"). JCP&L proposes that it recover lost distribution revenue from lost sales in all program years using the same LRAM approved in the April 27 Order and file approximately three to six months after the end of each program year, using actual verified savings when available. The Company will reconcile an over/under recovery in future periods with interest and add to the subsequent Rider LRAM filing.

PRE-FILED TESTIMONY, SCHEDULES, EXHIBITS, AND APPENDICES

54. Attached hereto and made part of this Petition are the following Exhibits, including pre-filed Direct Testimony (which further includes Schedules and Appendices thereto):

	Exhibit No.	**Description**
	JC-1	EE&C Plan II Overview, Minimum Filing Requirements Chart (Appendix A), Public Notice (Appendix B)
Edward C. Miller Direct Testimony	JC-2	EE&C Plan II Description, Budgets, Reporting
Carol A. Pittavino Direct Testimony	JC-3	Cost Recovery Mechanism, Revenue Requirements, Rate Filings, Bill Impacts
Brendon J. Baatz Direct Testimony	JC-4	Benefit-Cost Analysis

Certain documents submitted with this filing are marked as confidential.

PUBLIC HEARING, NOTICE, AND SERVICE OF FILING

55. JCP&L proposes that two virtual public hearings be held in its service territory. In accordance with MFR I.g., a draft form of public notice of the public hearing is attached as Appendix B to this Petition. It sets forth the dates, times, and places of the public hearings, the maximum dollar amount the Company seeks to recover through the EE&C2 component of Rider RRC, and the estimated overall bill impact on residential customers attributable to implementation of EE&C Plan II. JCP&L proposes that notice of this Plan filing be combined with notice of the public hearing and be published in daily and weekly newspapers published and/or circulated in the Company's service areas, after the dates, times, and places of all such public hearings have been scheduled by the Board or the Presiding Officer. The notice will also be served by mail upon the municipal clerks, the clerks of the Boards of County Commissioners, and, where appropriate, the County Executive Officers of all counties and municipalities located in the Company's service territory.

56. Copies of this Petition, all Appendices, and all supporting testimony (including Schedules and Exhibits thereto) have been or will be duly served upon the Department of Law and Public Safety, 124 Halsey Street, P.O. Box 45029, Newark, New Jersey 07101, and upon the Director, Division and Rate Counsel, 140 East Front Street, 4th Floor, P.O. Box 003, Trenton, N.J. 08625-0003 in accordance with the Board's requirements.

ADDITIONAL INFORMATION

57. In accordance with the Board's Orders and N.J.A.C. 14:1-5.12, attached hereto are the following required items of additional information and financial statements:

Appendix C Consolidated Tax Adjustment for Years 2018 through 2022 (CONFIDENTIAL)

Appendix D Comparative Balance Sheets at December 31, 2020, 2021, and 2022

Appendix E Comparative Income Statements for the Calendar Years Ending December 31, 2020, 2021, and 2022

Appendix F Balance Sheet at December 31, 2022

Appendix G Accounting Treatment for Proposed Cost Recovery

Appendix H Statement of the Amount of Revenue Derived in Calendar Year 2022 from Intrastate Sales and Services at Current Rates

Appendix I Itemized Schedule of Payments or Accruals to Affiliates

Appendix J Statement of Income – Distribution Earnings Test for the Twelve Months ended June 2023

58. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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CONCLUSION AND REQUEST FOR APPROVAL

WHEREFORE, Petitioner, Jersey Central Power & Light Company, respectfully requests that the Board issue a final decision and order no later than at its final Agenda meeting for 2024.

(1) finding that JCP&L's EE&C Plan II satisfies the requirements of the Orders and the MFRs approved therein;

(2) finding that EE&C Plan II as described in this Petition is reasonable and prudent;

(3) authorizing JCP&L to implement EE&C Plan II (and included programs) starting January 1, 2025 under the terms set forth in this Petition;

(4) determining that the Budget Adjustment Mechanism described herein is approved as proposed, or in the alternative, an incremental contingency amount equal to 15% of the Company's Total Budget be approved;

(5) determining that the cost recovery mechanism set forth in this Petition and the testimony of Ms. Pittavino (including Riders RRC and LRAM) will provide for just and reasonable rates and is approved;

(6) authorizing JCP&L to recover EE&C Plan II costs, on a full and timely basis, under the cost recovery mechanism set forth in this Petition and in the testimony of Ms. Pittavino; and

(7) granting such other and further relief as the Board shall deem just, lawful and proper.

Respectfully submitted,

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Counsel for
Jersey Central Power & Light Company

Date: December 1, 2023

CERTIFICATE OF SERVICE

I hereby certify that, on the within date, I caused this Verified Petition along with supporting testimony and attachments to be served by email upon those individuals listed on the service list attached to the cover letter, including attorneys for the Division of Rate Counsel and Deputy Attorneys General representing Board Staff.

Mark A. Lazaroff

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NJ EEEC Plan II Verified Petition.docx

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E-Signature Summary

E-Signature 1: Edward C. Miller (ECM)
December 01, 2023 11:24:47 -5:00 [B03044039E12] [148.108.100.144]
emille3@firstenergycorp.com (Principal) (Personally Known)

E-Signature Notary: Kori Rebecca Auman-Krebs (KRK)
December 01, 2023 11:24:47 -5:00 [0CAD493DD14B] [98.237.82.177]
kauman@firstenergycorp.com
I, Kori Rebecca Auman-Krebs, did witness the participants named above electronically sign this document.

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey Central Power & Light Company For Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs (JCP&L EE&C PLAN II)	:	BPU Docket No.

AFFIDAVIT OF VERIFICATION

Edward C. Miller, being duly sworn upon his oath, deposes and says:

1. I am Manager, Compliance & Development, in the Energy Efficiency Department for FirstEnergy Service Company, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company, the Petitioner named in the foregoing Verified Petition.

2. I have read the contents of the foregoing Verified Petition for approval of the proposed Triennium 2 Energy Efficiency & Conversation Plan and cost recovery, and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information, and belief.

Edward C. Miller
Signed on 2023/12/01 11:24:47 -5:00

Edward C. Miller

Commonwealth of Pennsylvania)
County of York)

Sworn to and subscribed before me this
1st day of December, 2023 by Edward C. Miller.

Signed on 2023/12/01 11:24:47 -5:00

Kori Rebecca Auman-Krebs
NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Kori Rebecca Auman-Krebs, Notary Public
Berks County
My Commission Expires Feb 14, 2027
Commission Number 1345524
Notary Stamp 2023/12/01 09:24:47 PST

Notarial act performed by audio-visual communication

Minimum Filing Requirements for Energy Efficiency and Renewable Energy Petitions
Under N.J.S.A. 48:3-98.1 and N.J.S.A. 48:3-87.9

§	REQUIREMENT	LOCATION IN FILING
I.	**General Filing Requirements**	
a.	The utility shall provide a table of contents for each filing.	Ex. JC-2 (Miller), Att. A ("Plan"), Sec. 1.0
b.	The utility shall provide with all filings, information and data pertaining to the specific program proposed, as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.	Petition, App. C-I; Plan; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
c.	All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the accounts and account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.	Petition, App. G; Ex. JC-3 (Pittavino)
d.	The utility shall provide supporting explanations, assumptions, calculations, and work papers as necessary for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1. The utility shall provide electronic copies of such supporting information, with all inputs and formulae intact, where applicable.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
e.	The filing shall include testimony supporting the petition, including all proposed programs.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
f.	For any proposed program, the utility shall be subject to the requirements in this and all subsequent Sections. If compliance with Section V and VI of these requirements would not be feasible for a particular program or sub-program, the utility may request an exemption but must demonstrate why such exemption should be granted. Examples of historical situations that have qualified for exemption include pilot programs, programs that had an educational or policy goal rather than resource acquisition focus, and programs that introduced novel ideas where documentation supporting estimated costs/benefits may not be easily produced.	N/A

§	REQUIREMENT	LOCATION IN FILING
g.	If the utility is filing for an increase in rates, charges, etc. or for approval of a program that may increase rates/changes to ratepayers in the future, the utility shall include a draft public notice with the petition and proposed publication dates.	Petition, App. B.
II.	**Program Description**	
a.	The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
i.	Program description/design	Plan, Sec. 3.0; Ex. JC-2 (Miller)
ii.	Target market segment – including eligible customers, properties, and measures/services – and eligibility requirements and processes	Plan, Sec. 3.0; Ex. JC-2 (Miller)
iii.	Existing incentives	Plan, Sec. 3.0 & App. H; Ex. JC-2 (Miller)
iv.	Proposed incentive structure or incentive ranges, including incentive payment processes and timeframes	Plan, Sec. 3.0 & App. H (Plan); Ex. JC-2 (Miller)
v.	Customer financing options	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
vi.	Contractor requirements and role: The utility shall provide a description of the extent to which the utility intends to utilize employees, contractors, or both to deliver the program(s). The utility shall also provide a description of contractor requirements, including common application elements and training requirements.	Plan, Sec. 3.0 & App. H; Ex. JC-2 (Miller)
vii.	Estimated program participants, by year	Plan, App. A; Ex. JC-2 (Miller)
viii.	Projections for energy savings and associated metrics for each program year relative to the quantitative performance indicators in Section VII.	Plan, App. A; Ex. JC-2 (Miller)
ix.	Program budget, by year	Plan, App. B; Ex. JC-2 (Miller)

§	REQUIREMENT	LOCATION IN FILING
x.	Projected program costs, by year, broken down into the following categories, as applicable: • capital cost; • utility administration; • marketing and outreach; • outside services; • incentives (including rebates and low- or no-interest loans); • inspections and quality control; and • evaluation. To the extent that the New Jersey Board of Public Utilities ("Board" or "BPU") directs New Jersey's Clean Energy Program ("NJCEP") to report additional categories, the utility shall provide additional categories, as applicable. Any workforce development and job training costs, health and safety costs, and costs of outreach to community-based organizations shall be shown separately.	Plan, App. B; Ex. JC-2 (Miller)
b.	The utility shall provide the following information about the proposed portfolio:	
i.	Quality assurance and control standards and remediation policies: The utility shall provide a detailed description of the process(es) for ensuring the quality of the programs and resolving any customer complaints related to the program(s).	Plan, Sec. 4.0; Ex. JC-2 (Miller)
ii.	Plan for workforce development and job training partnerships and pipelines for energy efficiency jobs, including for local, underrepresented, and disadvantaged workers. The utility will also provide a description of how the utility plans to engage with and support participation by minority-, women-, and veteran-owned and other underrepresented businesses to ensure equitable access to contracting opportunities under the proposed programs.	Plan, Sec. 4.0; Ex. JC-2 (Miller)
iii.	Customer access to current and historic energy usage data	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
iv.	Total budget summary, including an annual budget summary and joint budgets with partner utilities	Plan, Table 4 & Apps. B & C; Ex. JC-2 (Miller); Ex. JC-4 (Baatz), Sch. BJB-1 – Cost Benefit Analysis Workpapers (CONFIDENTIAL)

§	REQUIREMENT	LOCATION IN FILING
v.	Benefit-cost analysis (as defined in Section V)	Plan, App. E; Ex. JC-4 (Baatz)
vi.	The utility shall list its forecasted average cost to achieve each unit of energy savings in each sector.	Plan, App. D; Ex. JC-2 (Miller)
vii.	Marketing plan: The utility shall provide a description of where and how the proposed portfolio will be marketed or promoted to the sectors served by the utility's customer base, including coordinated customer outreach on core programs with other utilities. This shall include an explanation of how the specific services, along with prices, incentives, and energy bill savings for the proposed portfolio, will be conveyed to customers, where available and applicable. The marketing plan shall also include a description of any known market barriers that may impact implementation and strategies to address known market barriers.	Plan, Sec. 4.0; Ex. JC-2 (Miller)
c.	In areas where gas and electric service territories overlap, the utility shall provide a description of the program structure for coordinated, consistent delivery of programs between the utilities and estimated coordinated budgets and allocation of costs and energy savings between the utilities. The utility shall provide a description of how the utilities coordinated their program assumptions and other factors that could influence results for each coordinated program.	Plan, Sec. 5.0; Ex. JC-2 (Miller); Ex. JC-4 (Baatz)
III.	**Additional Filing Information Applicable Only to Renewable Energy Projects**	
a.	The utility shall propose the method for treatment of Renewable Energy Certificates ("RECs"), including solar incentives, or any other renewable energy incentive developed by the Board, including Greenhouse Gas Emissions Portfolio and Energy Efficiency Portfolio Standards including ownership and use of the certificate revenue stream(s).	N/A
b.	The utility shall also propose the method for treatment of any air emission credits and offsets, including Regional Greenhouse Gas Initiative carbon dioxide allowances and offsets, including ownership and use of the certificate revenue stream(s). For programs that are anticipated to reduce electricity sales in its service territory, the utility shall quantify the expected associated annual savings in REC, solar incentive, and any other renewable energy incentive costs.	N/A
IV.	**Cost Recovery Mechanism**	
a.	The utility shall provide appropriate financial data for the proposed program(s), including estimated revenues, expenses, and capitalized investments for each of the first three years of operations and at the beginning and end of each year of the three-year period. The utility shall include pro forma income statements for the proposed program(s) for each of the first three years	Plan, App. B; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino)

§	REQUIREMENT	LOCATION IN FILING
	of operations and actual or estimated balance sheets at the beginning and end of each year of the three-year period.	
b.	The utility shall provide detailed spreadsheets of the accounting treatment of the proposed cost recovery, including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed program cost recovery method.	Petition, App. G; Ex. JC-3 (Pittavino)
c.	The utility shall provide a detailed explanation, with all supporting documentation, of the recovery mechanism it proposes to utilize for cost recovery of the proposed program(s), including proposed recovery through the Societal Benefits Charge, a separate clause established for these programs, base rate revenue requirements, government funding reimbursement, retail margin, and/or other mechanisms.	Ex. JC-3 (Pittavino), Sch. CAP-3
d.	The utility's petition for approval, including proposed tariff sheets and other required information, shall be verified as to its accuracy and shall be accompanied by a certification of service demonstrating that the petition was served on the New Jersey Division of Rate Counsel simultaneous to its submission to the Board.	Ex. JC-3 (Pittavino), Sch. CAP-7 and CAP-8
e.	The utility shall provide a rate impact summary by year for the proposed program(s) and a cumulative rate impact summary by year for all approved and proposed programs showing the impact of individual programs, based upon a revenue requirement analysis that identifies all estimated program costs and revenues for each proposed program on an annual basis. Such rate impacts shall be calculated for each customer class. The utility shall also provide an annual bill impact summary by year for each program, and an annual cumulative bill impact summary by year for all approved and proposed programs showing bill impacts on a typical customer for each class.	Ex. JC-3 (Pittavino), Sch. CAP-5
f.	The utility shall provide, with supporting documentation, a detailed breakdown of the total costs for the proposed program(s), identified by cost segment, consistent with the program cost categories enumerated in Section II(a)(x). This shall also include a detailed analysis and breakdown and separation of the embedded and incremental costs that will be incurred to provide the services under the proposed program(s), with all supporting documentation. Embedded costs are costs that are provided for in the utility's base rates or through another rate mechanism. Incremental costs are costs associated with or created by the proposed program that are not provided for in base rates or another rate mechanism.	Plan, App. B & Table 4; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino), Sch. CAP-2

§	REQUIREMENT	LOCATION IN FILING
g.	The utility shall provide a detailed revenue requirement analysis that clearly identifies all estimated annual program costs and revenues for the proposed program(s), including effects upon rate base and pro forma income calculations.	Ex. JC-3 (Pittavino), Schs. CAP-3 & CAP-9
h.	The utility shall provide, with supporting documentation: (i) a calculation of its current capital structure, as well as its calculation of the capital structure approved by the Board in its most recent electric and/or gas base rate cases, and (ii) a statement as to its allowed overall rate of return approved by the Board in its most recent electric and/or gas base rate cases.	Ex. JC-3 (Pittavino), Sch. CAP-1
i.	If the utility is seeking carrying costs for a proposed program, the filing shall include a description of the methodology, capital structure, and capital cost rates used by the utility. A utility seeking performance incentives shall provide all supporting justifications and rationales for the incentives, along with supporting documentation, assumptions, and calculations. Utilities that have approved rate mechanisms or incentive treatment from previous cases and are not seeking a modification of such treatment through the current filing are not subject to this requirement.	Ex. JC-3 (Pittavino), Sch. CAP-1
V.	**Benefit-Cost Analysis**	
a.	The utility shall conduct a benefit-cost analysis of the programs and portfolio using the most recent New Jersey Cost Test, including its most recent avoided cost methodologies, as a primary test. In addition, the utility shall conduct benefit-cost analysis using the Participant Cost Test, Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective i.e., that includes the combined financial costs and benefits realized by the utility and the customer as defined in the then-current version of the California Standard Practice Manual. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation.	Plan, App. E; Ex. JC-4 (Baatz)
b.	The utility must demonstrate how the results of the tests in Section V(a) support Board approval of the proposed program(s), including how the programs are designed to achieve a benefit-to-cost ratio greater than or equal to 1.0 at the portfolio level when using the New Jersey Cost Test.	Ex. JC-4 (Baatz)
c.	Renewable energy programs, workforce development and job training costs, health and safety measures, and outreach to community-based organizations shall not be subject to a benefit-cost test, but the utility must estimate all direct and indirect benefits resulting from such a proposed program as well as provide the projected costs.	Plan, App. B; Ex. JC-2 (Miller)

§	REQUIREMENT	LOCATION IN FILING
d.	The level of energy and capacity savings shall be calculated using the most recent Technical Reference Manual approved by the Board. To the extent that a protocol does not exist or an alternative protocol is proposed for a filed program, the utility must submit a savings methodology for the program or contemplated measure for approval by the Board.	Plan, Apps. E & J; Ex. JC-4 (Baatz)
e.	For calculation of energy and capacity savings, as well as for cost effectiveness calculations, the utility shall apply the applicable net-to-gross ("NTG") ratio and realization rates provided in the current Technical Reference Manual. To the extent that a NTG value does not exist or an alternative NTG value is proposed for a filed program, the utility must submit a NTG value for the program or contemplated measure for approval by the Board.	Plan, Apps. E & J; Ex. JC-4 (Baatz)
VI.	**Evaluation, Measurement, and Verification ("EM&V")**	
a.	The utility shall describe the methodology, processes, and strategies for monitoring and improving program and portfolio performance related to the utility's targets established pursuant to the Quantitative Performance Indicators ("QPIs") in Section VII. The utility shall confirm that these methodologies, processes, and strategies conform with the current New Jersey EM&V guidance documents and standards. The utility shall also provide an EM&V budget consistent with the current New Jersey EM&V guidance documents and standards.	Plan, Sec. 4.0; Ex. JC-2 (Miller)
VII.	**Quantitative Performance Indicators: Targets**	
a.	The utility shall file QPI target values based on the metrics applicable to each program year of the three-year program filing cycle.	Plan, App. F; Ex. JC-2 (Miller)
b.	The utility shall provide a description of how the proposed portfolio achieves the targets established for each utility pursuant to the QPIs outlined in the BPU's most recent Energy Efficiency Framework Order, as applicable for each program year:	Ex. JC-2 (Miller); Plan, App. F
VII.	**Reporting Plan**	
a.	The utility shall comply with the reporting requirements as outlined in the BPU's most recent Energy Efficiency Framework Order.	Plan, Sec. 4.0; Ex. JC-2 (Miller)

Minimum Filing Requirements for Demand Response Programs

§	REQUIREMENT	LOCATION IN FILING
1)	**General Filing Requirements**	
a)	The utility shall provide a table of contents for each filing.	Ex. JC-2 Miller, Att. A ("Plan"), Sec. 1.0
b)	The utility shall provide with all filings, information and data pertaining to the specific program proposed, as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.	Petition; Plan; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
c)	All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the accounts and account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.	Petition, App. C-I; Plan, App. G; Ex. JC-3 (Pittavino)
d)	The utility shall provide supporting explanations, assumptions, calculations, and work papers as necessary for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1. The utility shall provide electronic copies of such supporting information, with all inputs and formulae intact, where applicable.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
e)	The filing shall include testimony supporting the petition, including all proposed programs.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
f)	For any proposed program, the utility shall be subject to the requirements in this and all subsequent Sections. If compliance with Section V and VI of these requirements would not be feasible for a particular program or sub-program, the utility may request an exemption but must demonstrate why such exemption should be granted. Examples of historical situations that have qualified for exemption include pilot programs, programs that had an educational or policy goal rather than resource acquisition focus, and programs that introduced novel ideas where documentation supporting estimated costs/benefits may not be easily produced.	N/A
g)	If the utility is filing for an increase in rates, charges, etc. or for approval of a program that may increase rates/changes to ratepayers in the future, the utility shall include a draft public notice with the petition and proposed publication dates.	Petition, App. B; Ex. JC-4 (Pittavino)
2)	**Program Description**	

§	REQUIREMENT	LOCATION IN FILING
a)	EDC DR Programs	
i)	The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:	Plan, Sec. 3.0
(1)	Program description/design, including:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(a)	Program kW demand reduction goals and curtailment objective(s);	Plan, Sec. 3.0 & Table 3
(b)	If using, how AMI is employed to signal load demand flexibility and to track curtailment volume, including baseline volume;	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(c)	How portability, as defined in the DR Guiding Principles (Appendix A), will be determined and demonstrated, including release clauses for customers to discontinue program participation and migrating services to a third party provider;	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(d)	Customer and aggregator access to current and historical energy usage data from smart meters, including available data fields, access rules, and technology standards; and	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
(e)	Detailed plan with timelines and planning priorities, addressing:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(i)	How their proposed second Triennium DR service programs align with DR Guiding Principles;	Plan, Sec. 3 (Plan); Ex. JC-2 (Miller)
(ii)	How to facilitate DERMS deployment & interoperability requirements that can support engagement of and compensation to aggregated grid flexibility resources; and	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(iii)	How the utility plans to work with stakeholders involved in creating an open, portable grid flexibility service model.	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(2)	Target market segment(s) and their priorities – including:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(a)	Eligible customers;	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(b)	Measures/services;	Plan, Sec. 3.0; Ex. JC-2 (Miller)

§	REQUIREMENT	LOCATION IN FILING
(c)	Eligibility requirements and processes; and	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(d)	Methodology to prioritize the procurement of customers for DR program participation to minimize distribution system investments.	Plan, Sec. 4.0; Ex. JC-2 (Miller)
(3)	Proposed incentives and/or tariffs	
(a)	Up-front enrollment incentive	Plan, Sec. 3.0 & App. H
(b)	Performance or persistence based payments	Plan, Sec. 3.0 & App. H
(4)	How demand reduction performance is measured, including data sources and methodology to calculate baseline, definition of turndown events, and capacity savings;	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(5)	Program design and measurement to minimize rebound effects after a turndown event;	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(6)	Incentives structure and ranges for demand reduction performance achieved, including incentive payment processes and timeframes;	Plan, Sec. 3.0 & App. H
(7)	Any mutual exclusivity terms that may be needed for avoiding double counting in newly proposed DR programs.	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(8)	Qualified equipment supported by incentives, such as smart thermostats and smart inverters:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(a)	Incentives structure and ranges for the equipment, including incentive payment processes and time frames; and	Plan, Sec. 3.0 & App. H
(b)	A description of data and communication standards. If the standard is not an internationally recognized standard, give justification for why.	Plan, Sec. 3.0; Ex. JC-2 (Miller)
ii)	Capital investments, such as IT hardware and infrastructure to support DR and DERMS. Such investments may be recovered through rate-basing, but must be justified in the benefit-cost analysis.	Plan, Sec. 3.0; Ex. JC-2 (Miller)
iii)	Customer financing options, including:	N/A
(1)	Monthly “on bill” charges directly from utility; and	N/A
(2)	Financing through PACE programs if applicable	N/A
(3)	Third Party service billing coordinated through utility.	N/A
iv)	Contractor requirements and role: The utility shall provide a description of the extent to which the utility intends to utilize employees, contractors, or both to deliver the program(s).	Plan, Sec. 3.0; Ex. JC-2 (Miller)

§	REQUIREMENT	LOCATION IN FILING
	The utility shall also provide a description of contractor requirements, including common application elements and training/certification/recertification requirements.	
v)	Estimated program participants, by market segment each year.	Plan, App. A; Ex. JC-2 (Miller)
vi)	Projections for performance metrics for each program year relative to the program's targets or quantitative performance indicators as defined in Section VII.	Plan, Apps. A & F; Ex. JC-2 (Miller)
vii)	Program budget, by year.	Plan, App. B; Ex. JC-2 (Miller)
viii)	Program participant exit/transition financial impacts including:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
(1)	Administrative updates for documentation and database management;	Plan, Sec. 4.0
(2)	Reduced amortization from early termination;	N/A
(3)	Asset purchase revenues from sold equipment; and	N/A
(4)	Participant exit fees collected if any.	Plan, Sec. 3.0 & App. H; Ex. JC-2 (Miller)
ix)	Projected program costs, by year, broken down into the following categories, as applicable: • capital cost; • utility administration; • marketing and outreach; • outside services; • incentives (including rebates and low- or no-interest loans); • inspections and quality control; and • evaluation. To the extent that the Board directs New Jersey's Clean Energy Program ("NJCEP") to report additional categories, the utility shall provide additional categories, as applicable. Any workforce development and job training costs, health and safety costs, and costs of outreach to community-based organizations shall be shown separately.	Plan, App. B; Ex. JC-2 (Miller)
b)	GDC DR Programs	N/A

§	REQUIREMENT	LOCATION IN FILING
i)	The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:	N/A
(1)	Program description/design, including:	N/A
(a)	Program therm demand reduction goals and curtailment objective(s);	N/A
(b)	Demand response description, including hardware and software used, event triggers, maximum event count, and customer override rules; and	N/A
(c)	Release clauses for customers to discontinue program participation.	N/A
(2)	Target market segment(s) and their priorities – including:	N/A
(a)	Eligible customers;	N/A
(b)	Measures/services;	N/A
(c)	Eligibility requirements and processes; and	N/A
(d)	Methodology to prioritize the procurement customers for DR program participation over distribution system investments.	N/A
(3)	Proposed incentives and/or tariffs	N/A
(a)	How demand reduction performance is measured, including data sources and methodology to calculate baseline, definition of turndown events, and capacity savings;	N/A
(b)	Program design and measurement to minimize rebound effects after a turndown event;	N/A
(c)	Incentives structure and ranges for demand reduction performance achieved, including incentive payment processes and timeframes; and	N/A
(d)	Any mutual exclusivity terms that may be needed for avoiding double counting in newly proposed DR programs.	N/A
(4)	Qualified equipment supported by incentives, such as smart thermostats:	N/A
(a)	Incentives structure and ranges for the equipment, including incentive payment processes and timeframes; and	N/A
(b)	A description of data and communication standards. If the standard is not an internationally recognized standard, give justification for why.	N/A
(5)	Capital investments, such as IT hardware and infrastructure to support DR. Such investments may be rate-based, but must be justified in the benefit-cost analysis.	N/A
(6)	Customer financing options	N/A
(7)	Contractor requirements and role: The utility shall provide a description of the extent to which the utility intends to utilize employees, contractors, or both to deliver the program(s).	N/A

§	REQUIREMENT	LOCATION IN FILING
	The utility shall also provide a description of contractor requirements, including common application elements and training/certification/recertification requirements.	
(8)	Estimated program participants, by market segment each year.	N/A
(9)	Projections for performance metrics for each program year relative to the program's targets or quantitative performance indicators as defined in Section VII.	N/A
(10)	Program budget, by year	N/A
(11)	Projected program costs, by year, broken down into the following categories, as applicable: • capital cost; • utility administration; • marketing and outreach; • outside services; • incentives (including rebates and low- or no-interest loans); • inspections and quality control; and • evaluation. To the extent that the Board directs New Jersey's Clean Energy Program ("NJCEP") to report additional categories, the utility shall provide additional categories, as applicable.	N/A
ii)	Any workforce development and job training costs, health and safety costs, and costs of outreach to community-based organizations shall be shown separately.	N/A
c)	The utility shall provide the following information about the proposed Demand Response program(s):	N/A
i)	Quality assurance and control standards and remediation policies: The utility shall provide a detailed description of the process(es) for ensuring the quality of the programs and resolving any customer complaints related to the program(s).	N/A
ii)	Plan for workforce development and job training partnerships and pipelines for energy efficiency jobs, including for local, underrepresented, and disadvantaged workers. The utility will also provide a description of how the utility plans to engage with and support participation by minority-, women-, and veteran-owned and other underrepresented businesses to ensure equitable access to contracting opportunities under the proposed programs.	N/A
iii)	Data Transparency	N/A

§	REQUIREMENT	LOCATION IN FILING
(1)	To support any evaluation-related work3, data should be provided by the utility or state or their program administrator in full and within four weeks of the request. Time extensions may be approved by Staff if they are received more than a week before the data are due and if a meeting has been held with the Statewide Evaluator team requesting the data to identify if there are adequate substitutes (in the Statewide Evaluator's judgment) for the initially-requested data.	N/A
(2)	Data delivery must use appropriate secure delivery systems.	N/A
(3)	Staff will require regular (at least quarterly) reporting on data requests and their fulfilment status (timeliness, completeness, data quality, etc.)	N/A
iv)	Customer access to current and historic energy usage data from smart meters, including available data fields, access rules, and technology standards	N/A
v)	Total budget summary, including an annual budget summary and joint budgets with partner utilities	N/A
vi)	Benefit-cost analysis (as defined in Section V)	N/A
vii)	The utility shall list its forecasted average cost to achieve each unit of capacity and energy savings in each program.	N/A
viii)	Marketing plan: The utility shall provide a description of where and how the proposed portfolio will be marketed or promoted to the sectors served by the utility's customer base, including coordinated customer outreach on core programs with other utilities. This shall include an explanation of how the specific services, along with prices, incentives, and energy bill savings for the proposed portfolio, will be conveyed to customers, where available and applicable. The marketing plan shall also include a description of any known market barriers that may impact implementation and strategies to address known market barriers.	N/A
ix)	In areas where gas and electric service territories overlap, the utility shall provide a description of the program structure for coordinated, consistent delivery of programs between the utilities and estimated coordinated budgets and allocation of costs and capacity and energy savings between the utilities. The utility shall provide a description of how the utilities coordinated their program assumptions and other factors that could influence results for each coordinated program.	N/A
2)	**Additional Filing Information Applicable Only to DR Programs That Are Integrated With Renewable Energy Projects**	N/A

§	REQUIREMENT	LOCATION IN FILING
	While it is anticipated that only non-generation assets will be enrolled for mainstream demand response programs, and that integrated renewable generation and non-generation will only be evaluated through pilot programs, there are still potential impacts that must be understood. Because of these potential impacts, the following shall be identified for these filings.	
a)	The utility shall propose the method for treatment of Renewable Energy Certificates ("RECs"), including solar incentives, or any other renewable energy incentive developed by the Board, including Greenhouse Gas Emissions Portfolio and Energy Efficiency Portfolio Standards including ownership and use of the certificate revenue stream(s). The utility shall also propose the method for treatment of any air emission credits and offsets, including Regional Greenhouse Gas Initiative carbon dioxide allowances and offsets, including ownership and use of the certificate revenue stream(s). For programs that are anticipated to reduce electricity sales in its service territory, the utility shall quantify the expected associated annual savings in REC, solar incentive, and any other renewable energy incentive costs.	N/A
b)	The utility shall state how any Net Energy Metering billing treatment would be impacted when a demand response event is called to reduce load behind the meter, specifically for loads that will no longer exceed generation.	N/A
3)	**Cost Recovery Mechanism**	
a)	The utility shall provide appropriate financial data for the proposed program(s), including estimated revenues, expenses, and capitalized investments for each of the first three years of operations and at the beginning and end of each year of the three-year period. The utility shall include pro forma income statements for the proposed program(s) for each of the first three years of operations and actual or estimated balance sheets at the beginning and end of each year of the three-year period.	Plan, App. B (Plan); Ex. JC-2 (Miller); Ex. JC-3 (Pittavino)
b)	The utility shall provide detailed spreadsheets of the accounting treatment of the proposed cost recovery, including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed program cost recovery method.	Petition, App. G; Ex. JC-3 (Pittavino)
c)	The utility shall provide a detailed explanation, with all supporting documentation, of the recovery mechanism it proposes to utilize for cost recovery of the proposed program(s), including proposed recovery through the Societal Benefits Charge, a separate clause	Ex. JC-3 (Pittavino), Sch. CAP-3

§	REQUIREMENT	LOCATION IN FILING
	established for these programs, base rate revenue requirements, government funding reimbursement, retail margin, and/or other mechanisms.	
d)	The utility's petition for approval, including proposed tariff sheets and other required information, shall be verified as to its accuracy and shall be accompanied by a certification of service demonstrating that the petition was served on the New Jersey Division of Rate Counsel simultaneous to its submission to the Board.	Ex. JC-3 (Pittavino), Schs. CAP-7 & CAP-8
e)	The utility shall provide a rate impact summary by year for the proposed program(s) and a cumulative rate impact summary by year for all approved and proposed programs showing the impact of individual programs, based upon a revenue requirement analysis that identifies all estimated program costs and revenues for each proposed program on an annual basis. Such rate impacts shall be calculated for each customer class. The utility shall also provide an annual bill impact summary by year for each program, and an annual cumulative bill impact summary by year for all approved and proposed programs showing bill impacts on a typical customer for each class.	Ex. JC-3 (Pittavino), Sch. CAP-5
f)	The utility shall provide, with supporting documentation, a detailed breakdown of the total costs for the proposed program(s), identified by cost segment, consistent with the program cost categories enumerated in Section II(a)(x). This shall also include a detailed analysis and breakdown and separation of the embedded and incremental costs that will be incurred to provide the services under the proposed program(s), with all supporting documentation. Embedded costs are costs that are provided for in the utility's base rates or through another rate mechanism. Incremental costs are costs associated with or created by the proposed program that are not provided for in base rates or another rate mechanism. Customer recovered costs is income received from customers or their agents upon exit from the program or conversion to third party operation.	Plan, App. B & Table 4; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino), Sch. CAP-2 (Pittavino);
g)	The utility shall provide a detailed revenue requirement analysis that clearly identifies all estimated annual program costs and revenues for the proposed program(s), including effects upon rate base and pro forma income calculations.	Ex. JC-3 (Pittavino), Schs. CAP-3 & CAP-9
h)	The utility shall provide, with supporting documentation: (i) a calculation of its current capital structure, as well as its calculation of the capital structure approved by the Board in its most recent electric and/or gas base rate cases, and (ii) a statement as to its allowed overall rate of return approved by the Board in its most recent electric and/or gas base rate cases.	Ex. JC-3 (Pittavino), Sch. CAP-1

§	REQUIREMENT	LOCATION IN FILING
i)	If the utility is seeking carrying costs for a proposed program, the filing shall include a description of the methodology, capital structure, and capital cost rates used by the utility. A utility seeking performance incentives shall provide all supporting justifications and rationales for the incentives, along with supporting documentation, assumptions, and calculations. Utilities that have approved rate mechanisms or incentive treatment from previous cases and are not seeking a modification of such treatment through the current filing are not subject to this requirement.	Ex. JC-3 (Pittavino), Sch. CAP-1
4)	**Benefit-Cost Analysis**	
a)	The utility shall conduct a benefit-cost analysis of the programs using the most recent New Jersey Cost Test, including its most recent avoided cost methodologies, as a primary test. In addition, the utility shall conduct benefit-cost analysis using the Participant Cost Test, Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective i.e., that includes the combined financial costs and benefits realized by the utility and the customer as defined in the then-current version of the California Standard Practice Manual. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation.	Plan, App. E (Plan); Ex. JC-4 (Baatz)
b)	The utility must demonstrate how the results of the tests in Section V(a) support Board approval of the proposed program(s), including how the programs are designed to achieve a benefit-to-cost ratio greater than or equal to 1.0 at the portfolio level when using the New Jersey Cost Test.	Ex. JC-4 (Baatz)
c)	Renewable energy programs, workforce development and job training costs, health and safety measures, and outreach to community-based organizations shall not be subject to a benefit-cost test, but the utility must estimate all direct and indirect benefits resulting from such a proposed program as well as provide the projected costs.	Plan, App. B; Ex. JC-2 (Miller)
d)	The level of capacity and energy savings shall be calculated using the most recent Technical Reference Manual approved by the Board. To the extent that a protocol does not exist or an alternative protocol is proposed for a filed program, the utility must submit a savings methodology for the program or contemplated measure for approval by the Board.	Plan, Apps. E & J; Ex. JC-4 (Baatz)
e)	For calculation of capacity and energy savings, as well as for cost effectiveness calculations, the utility shall report net impact by applying applicable NTG ratios ("NTG") or some form of "direct to net" measurement. To the extent that a NTG value does not exist or an alternative	Plan, Apps. E and J; Ex. JC-4 (Baatz)

§	REQUIREMENT	LOCATION IN FILING
	NTG value is proposed for a filed program, the utility must submit a NTG value for the program or contemplated measure for approval by the Board.	
5)	**Evaluation, Measurement, and Verification ("EM&V")** The utility shall describe the methodology, processes, and strategies for monitoring and improving program and portfolio performance related to the utility's targets established pursuant to the Reporting Plan for Performance Metrics in Section VII. Demand Response program impact methodology shall clearly define the calculation of baseline consumption and demand reduction volumes. Net-to-gross evaluation methods shall be described if the proposed measurement approach is not inherently "direct-to-net," such as measurement that uses a control group. The utility shall confirm that these methodologies, processes, and strategies conform with the current New Jersey EM&V guidance documents and standards. The utility shall also provide an EM&V budget consistent with the current New Jersey EM&V guidance documents and standards.	Plan, Sec. 4.0; Ex. JC-2 (Miller)
6)	**Reporting Plan for Performance Metrics**	
a)	The utility shall file target values based on key performance metrics applicable to each program year of the three-year program filing cycle.	Plan, App. F; Ex. JC-2 (Miller)
b)	The utility shall provide a description of how the proposed portfolio achieves the targets established for each utility pursuant to the following performance metrics as applicable for each program year:	Plan, App. G; Ex. JC-2 (Miller);
i)	Dollars spent per customer enrolled per $ spent ($/participant) by segment for each proposed program;	Plan, App. G; Ex. JC-2 (Miller)
ii)	Dollars spent per capacity enrolled ($/kW) by each segment for each proposed program;	Plan, Apps. D & G; Ex. JC-2 (Miller)
iii)	Intensity impact (kWh or CO2 during peak event) for each proposed program. The utility shall, based on the program design, define the specific calculation to measure intensity impact;	Plan, App. G; Ex. JC-2 (Miller)
iv)	Ratio of number of customer responses to control requests over number of control requests.	Plan, App. G; Ex. JC-2 (Miller)

Minimum Filing Requirements for Building Decarbonization Start-Up Programs

§	REQUIREMENT	LOCATION IN FILING
I.	**General Filing Requirements**	
a.	The utility shall provide a table of contents for each filing.	Ex. JC-2 (Miller), Att. B ("Plan"), Sec. 1.0
b.	The utility shall provide with all filings, information and data pertaining to the specific program proposed, as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.	Petition; Att. B; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
c.	All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the accounts and account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.	Petition, App. C-I; Plan, App. G; Ex. JC-3 (Pittavino)
d.	The utility shall provide supporting explanations, assumptions, calculations, and work papers as necessary for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1. The utility shall provide electronic copies of such supporting information, with all inputs and formulae intact, where applicable.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
e.	The filing shall include testimony supporting the petition, including all proposed programs.	Ex. JC-2 (Miller); Ex. JC-3 (Pittavino); Ex. JC-4 (Baatz)
f.	For any proposed program, the utility shall be subject to the requirements in this and all subsequent Sections. If compliance with Section V and VI of these requirements would not be feasible for a particular program or sub-program, the utility may request an exemption but must demonstrate why such exemption should be granted. Examples of historical situations that have qualified for exemption include pilot programs, programs that had an educational or policy goal rather than resource acquisition focus, and programs that introduced novel ideas where documentation supporting estimated costs/benefits may not be easily produced.	N/A
g.	If the utility is filing for an increase in rates, charges, etc. or for approval of a program that may increase rates/changes to ratepayers in the future, the utility shall include a draft public notice with the petition and proposed publication dates.	Petition, App. B; Ex. JC-4 (Pittavino)

II.	Program Description	
a.	The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:	Plan, Sec. 3.0; Ex. JC-2 (Miller)
i.	Program description/design	Plan, Sec. 3.0; Ex. JC-2 (Miller)
ii.	Target market segment – including eligible customers, properties, and measures/services – and eligibility requirements and processes	Plan, Sec. 3.0; Ex. JC-2 (Miller)
iii.	Existing incentives	Plan, Sec. 3.0 & App. H; Ex. JC-2 (Miller)
iv.	Proposed incentive structure or incentive ranges, including incentive payment processes and timeframes	Plan, Sec. 3.0 & App. H; Ex. JC-2 (Miller)
v.	Customer financing options	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
vi.	Contractor requirements and role: The utility shall provide a description of the extent to which the utility intends to utilize employees, contractors, or both to deliver the program(s). The utility shall also provide a description of contractor requirements, including common application elements and training requirements.	Plan, Sec. 3.0; Ex. JC-2 (Miller)
vii.	Estimated program participants, by year	Plan, App. A; Ex. JC-2 (Miller)
viii.	Projections for energy savings and associated metrics for each program year relative to the quantitative performance indicators in Section VII.	Plan, App. A; Ex. JC-2 (Miller)
ix.	Program budget, by year	Plan, App. B; Ex. JC-2 (Miller)
x.	Projected program costs, by year, broken down into the following categories, as applicable: • capital cost; • utility administration; • marketing and outreach; • outside services; • incentives (including rebates and low- or no-interest loans); • inspections and quality control; and • evaluation.	Plan, App. B; Ex. JC-2 (Miller)

	To the extent that the New Jersey Board of Public Utilities ("Board" or "BPU") directs New Jersey's Clean Energy Program ("NJCEP") to report additional categories, the utility shall provide additional categories, as applicable. Any workforce development and job training costs, health and safety costs, and costs of outreach to community-based organizations shall be shown separately.	
b.	The utility shall provide the following information about the proposed portfolio:	
i.	Quality assurance and control standards and remediation policies: The utility shall provide a detailed description of the process(es) for ensuring the quality of the programs and resolving any customer complaints related to the program(s).	Plan, Sec. 4.0; Ex. JC-2 (Miller)
ii.	Plan for workforce development and job training partnerships and pipelines for energy efficiency jobs, including for local, underrepresented, and disadvantaged workers. The utility will also provide a description of how the utility plans to engage with and support participation by minority-, women-, and veteran-owned and other underrepresented businesses to ensure equitable access to contracting opportunities under the proposed programs.	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
iii.	Customer access to current and historic energy usage data	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)
iv.	Total budget summary, including an annual budget summary and joint budgets with partner utilities	Plan, Apps. B & C & Table 4; Ex. JC-2 (Miller); Ex. JC-4 (Baatz), Sch. BJB-1 – Cost Benefit Analysis Workpapers (CONFIDENTIAL)
v.	Benefit-cost analysis (as defined in Section V)	Plan, App. E (Plan); Ex. JC-4 (Baatz)
vi.	The utility shall list its forecasted average cost to achieve each unit of energy savings in each sector.	Plan, App. D; Ex. JC-2 (Miller)
vii.	Marketing plan: The utility shall provide a description of where and how the proposed portfolio will be marketed or promoted to the sectors served by the utility's customer base, including coordinated customer outreach on core programs with other utilities. This shall include an explanation of how the specific services, along with prices, incentives, and energy bill savings for the proposed portfolio, will be conveyed to customers, where available and applicable. The	Plan, Secs. 3.0 & 4.0; Ex. JC-2 (Miller)

	marketing plan shall also include a description of any known market barriers that may impact implementation and strategies to address known market barriers.	
c.	In areas where gas and electric service territories overlap, the utility shall provide a description of the program structure for coordinated, consistent delivery of programs between the utilities and estimated coordinated budgets and allocation of costs and energy savings between the utilities. The utility shall provide a description of how the utilities coordinated their program assumptions and other factors that could influence results for each coordinated program.	Plan, Sec. 5.0; Ex. JC-2 (Miller); Ex. JC-4 (Baatz)
III.	**Additional Filing Information Applicable Only to Renewable Energy Projects**	
a.	The utility shall propose the method for treatment of Renewable Energy Certificates ("RECs"), including solar incentives, or any other renewable energy incentive developed by the Board, including Greenhouse Gas Emissions Portfolio and Energy Efficiency Portfolio Standards including ownership and use of the certificate revenue stream(s).	N/A
b.	The utility shall also propose the method for treatment of any air emission credits and offsets, including Regional Greenhouse Gas Initiative carbon dioxide allowances and offsets, including ownership and use of the certificate revenue stream(s). For programs that are anticipated to reduce electricity sales in its service territory, the utility shall quantify the expected associated annual savings in REC, solar incentive, and any other renewable energy incentive costs.	N/A
IV.	**Cost Recovery Mechanism**	
a.	The utility shall provide appropriate financial data for the proposed program(s), including estimated revenues, expenses, and capitalized investments for each of the first three years of operations and at the beginning and end of each year of the three-year period. The utility shall include pro forma income statements for the proposed program(s) for each of the first three years of operations and actual or estimated balance sheets at the beginning and end of each year of the three-year period.	Plan, App. B; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino)
b.	The utility shall provide detailed spreadsheets of the accounting treatment of the proposed cost recovery, including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed program cost recovery method.	Petition, App. G; Ex. JC-3 (Pittavino)
c.	The utility shall provide a detailed explanation, with all supporting documentation, of the recovery mechanism it proposes to utilize for cost recovery of the proposed program(s), including proposed recovery through the Societal Benefits Charge, a separate clause established for these programs, base rate revenue requirements, government funding reimbursement, retail margin, and/or other mechanisms.	Ex. JC-3 (Pittavino), Sch. CAP-3

d.	The utility's petition for approval, including proposed tariff sheets and other required information, shall be verified as to its accuracy and shall be accompanied by a certification of service demonstrating that the petition was served on the New Jersey Division of Rate Counsel simultaneous to its submission to the Board.	Ex. JC-3 (Pittavino), Schs. CAP-7 & CAP-8
e.	The utility shall provide a rate impact summary by year for the proposed program(s) and a cumulative rate impact summary by year for all approved and proposed programs showing the impact of individual programs, based upon a revenue requirement analysis that identifies all estimated program costs and revenues for each proposed program on an annual basis. Such rate impacts shall be calculated for each customer class. The utility shall also provide an annual bill impact summary by year for each program, and an annual cumulative bill impact summary by year for all approved and proposed programs showing bill impacts on a typical customer for each class.	Ex. JC-3 (Pittavino), Sch. CAP-5
f.	The utility shall provide, with supporting documentation, a detailed breakdown of the total costs for the proposed program(s), identified by cost segment, consistent with the program cost categories enumerated in Section II(a)(x). This shall also include a detailed analysis and breakdown and separation of the embedded and incremental costs that will be incurred to provide the services under the proposed program(s), with all supporting documentation. Embedded costs are costs that are provided for in the utility's base rates or through another rate mechanism. Incremental costs are costs associated with or created by the proposed program that are not provided for in base rates or another rate mechanism.	Plan, App. B & Table 4; Ex. JC-2 (Miller); Ex. JC-3 (Pittavino), Sch. CAP-2
g.	The utility shall provide a detailed revenue requirement analysis that clearly identifies all estimated annual program costs and revenues for the proposed program(s), including effects upon rate base and pro forma income calculations.	Ex. JC-3 (Pittavino), Schs. CAP-3 & CAP-9
h.	The utility shall provide, with supporting documentation: (i) a calculation of its current capital structure, as well as its calculation of the capital structure approved by the Board in its most recent electric and/or gas base rate cases, and (ii) a statement as to its allowed overall rate of return approved by the Board in its most recent electric and/or gas base rate cases.	Ex. JC-3 (Pittavino), Sch. CAP-1
i.	If the utility is seeking carrying costs for a proposed program, the filing shall include a description of the methodology, capital structure, and capital cost rates used by the utility. A utility seeking performance incentives shall provide all supporting justifications and rationales for the incentives, along with supporting documentation, assumptions, and calculations. Utilities that have approved rate mechanisms or incentive treatment from previous cases and are not	Ex. JC-3 (Pittavino), Sch. CAP-1

	seeking a modification of such treatment through the current filing are not subject to this requirement.	
V.	**Benefit-Cost Analysis**	
a.	The utility shall conduct a benefit-cost analysis of the programs and portfolio using the most recent New Jersey Cost Test, including its most recent avoided cost methodologies, as a primary test. In addition, the utility shall conduct benefit-cost analysis using the Participant Cost Test, Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective i.e., that includes the combined financial costs and benefits realized by the utility and the customer as defined in the then-current version of the California Standard Practice Manual. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation.	Plan, App. E; Ex. JC-4 (Baatz)
b.	The utility must calculate and track the results of the tests in Section V(a) to analyze and improve program design and performance with the goal of having Building Decarbonization ("BD") Programs for Triennium 3 that achieve a benefit-to-cost ratio greater than or equal to 1.0 when using the New Jersey Cost Test ("NJCT").	Ex. JC-4 (Baatz)
c.	Renewable energy programs, workforce development and job training costs, health and safety measures, and outreach to community-based organizations shall not be subject to a benefit-cost test, but the utility must estimate all direct and indirect benefits resulting from such a proposed program as well as provide the projected costs.	Plan, App. B; Ex. JC-2 (Miller)
d.	The level of energy and capacity savings shall be calculated using the most recent Technical Reference Manual approved by the Board. To the extent that a protocol does not exist or an alternative protocol is proposed for a filed program, the utility must submit a savings methodology for the program or contemplated measure for approval by the Board.	Plan, Apps. E & J; Ex. JC-4 (Baatz)
e.	For calculation of energy and capacity savings, as well as for cost effectiveness calculations, the utility shall apply the applicable net-to-gross ("NTG") ratio and realization rates provided in the current Technical Reference Manual. To the extent that a NTG value does not exist or an alternative NTG value is proposed for a filed program, the utility must submit a NTG value for the program or contemplated measure for approval by the Board.	Plan, Apps. E & J; Ex. JC-4 (Baatz)
VI.	**Evaluation, Measurement, and Verification ("EM&V")**	
a.	The utility shall describe the methodology, processes, and strategies for monitoring and improving program and portfolio performance related to developing a full program for Triennium 2. The utility shall confirm that these methodologies, processes, and strategies	Plan, Sec. 4.0; Ex. JC-2 (Miller)

	conform with the current New Jersey EM&V guidance documents and standards or propose modifications and additions as needed for BD Programs. The utility shall also provide an EM&V budget consistent with the current New Jersey EM&V guidance documents and standards.	
b.	The utility shall provide information on data transparency. 1. To support any evaluation-related work,* data should be provided by the utility or State or their program administrator in full and within four weeks of the request. Time extensions may be approved by Staff if they are received more than a week before the data are due and if a meeting has been held with the Statewide Evaluator team requesting the data to identify if there are adequate substitutes (in the Statewide Evaluator's judgment) for the initially-requested data. 2. Data delivery must use appropriate secure delivery systems. 3. Staff will require regular (at least quarterly) reporting on data requests and their fulfilment status (timeliness, completeness, data quality, etc.) *Evaluation-related work includes but is not limited to impact, process, net-to-gross, baseline, EUL/RUL, cost-effectiveness, TRM, full load hours, non-energy impacts, market research, surveys, and numerous other evaluation-related analyses.	Ex. JC-2 (Miller)
VII.	**Quantitative Performance Indicators: Targets**	
a.	The utility shall file estimated values for each program year for the following metrics: • Site and source energy savings by fuel (MMBtu) • Site and source lifetime energy savings by fuel (MMBtu) • Site and source annual emissions by fuel (CO2e MT) • Site and source lifetime emissions by fuel (CO2e MT) • Net annual peak demand savings by fuel (electricity and natural gas only) (peak MW or peak-day therm) • CO2 emissions impacts by fuel (CO2e MT) • Net CO2 emissions impacts across fuels (CO2e MT) • Levelized cost per metric ton of CO2e (costs levelized over the EUL or AUL, as appropriate, of the measure or project divided by lifetime net CO2e impacts) • Number of distributors and contractors engaged in the program • Number of program participants and installations, overall and for LMI	Plan, App. F; Ex. JC-2 (Miller)

	• Number and geographic location of installations	
b.	The utility shall provide a description of how the proposed portfolio achieves the estimated outcomes.	Plan, App. G; Ex. JC-2 (Miller);
VIII.	**Reporting Plan**	
a.	The utility shall comply with the reporting requirements as outlined in the BPU's most recent Energy Efficiency Framework Order.	Plan, Sec. 4.0; Ex. JC-2 (Miller)

NOTICE TO JERSEY CENTRAL POWER & LIGHT COMPANY CUSTOMERS

IN THE MATTER OF THE PETITION OF JERSEY CENTRAL POWER & LIGHT COMPANY FOR APPROVAL OF ITS SECOND ENERGY EFFICIENCY AND CONSERVATION PLAN INCLUDING ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS ("JCP&L EE&C Plan II Filing")

Notice of a Filing and Notice of Public Hearings BPU Docket Nos._____

PLEASE TAKE NOTICE that, on December 1, 2023, Jersey Central Power & Light Company ("JCP&L") filed a verified petition with the New Jersey Board of Public Utilities ("Board") seeking approval of its proposed Triennium 2 Energy Efficiency and Conservation Plan (the "Plan"), covering the 2.5-year period starting January 1, 2025 and ending June 30, 2027, as well as approval of its associated cost recovery mechanism.

The Plan consists of ten energy efficiency programs, one peak demand reduction program, and one building decarbonization program, with dedicated programs for residential, commercial and industrial, and multifamily customers. JCP&L is proposing up to $923.3 million in investment and up to $40.9 million in expenses for the Plan over the 2.5-year period covered by this filing. The Plan will further the goal of achieving energy reduction, as set forth in the Clean Energy Act of 2018 and New Jersey's 2020 Energy Master Plan, and complies with the requirements of the Board's May 24, 2023 and July 26, 2023 Orders Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs.

In conjunction with implementing the Plan, JCP&L will seek Board approval to recover in rates via proposed Tariff Riders Regional Greenhouse Gas Initiative Recovery Charge ("RRC") (through the "EE&C2" component) and Lost Revenue Adjustment Mechanism for the revenue increases associated with the capital investment costs, operation and maintenance expenses, and lost revenues associated with the Plan. Although JCP&L is not seeking an increase at this time, it seeks authority to recover a return on and return of its investment through annual adjustments to these reconcilable clauses beginning on January 1, 2025. JCP&L estimates that rate changes for electric rates effective January 1, 2025 would increase rates for an average residential customer by approximately $0.97 per month in the first six-month program year of the Plan, running from January 1, 2025 to June 30, 2025. These rate changes are only current estimates and are subject to change.

The following illustrative chart shows the estimated monthly bill impacts (by cumulative dollars and percentages) to typical residential and class average customers based on a comparison of present and proposed rates at each rate adjustment date under the Plan and the approximate net effect on customers in various rate classes of the proposed increases in charges, although the actual effect on specific customers will vary according to the actual costs, applicable rate schedule, and level of the customer's usage.

STATEMENT OF THE MONTHLY EFFECT OF PROPOSED INCREASE IN RIDER RRC CHARGES AS COMPARED TO THE RATES IN EFFECT AS OF OCTOBER 1, 2023

	Class Average Per Customer/Fixture			
		Effective January 1, 2025	Effective July 1, 2025	Effective July 1, 2026
	Current Monthly	Proposed Monthly	Proposed Monthly	Proposed Monthly
Rate Class	Bill (1)	Bill (2)	Bill (2)	Bill (2)
Residential (RS)	$119.02	$120.00	$121.57	$123.89
Residential Time of Day (RT/RGT)	$164.20	$165.58	$167.83	$171.15
General Service – Secondary (GS)	$612.43	$617.80	$626.48	$639.30
General Service - Secondary Time of Day (GST)	$34,850.66	$35,113.83	$35,539.23	$36,167.56
General Service – Primary (GP)	$48,532.18	$48,942.58	$49,605.97	$50,585.85
General Service – Transmission (GT)	$124,314.63	$125,491.91	$127,394.90	$130,205.76
Lighting (Average Per Fixture)	$11.70	$11.76	$11.85	$11.98

	Class Average Per Customer /Fixture Incremental Increase ($)			
		Effective January 1, 2025	Effective July 1, 2025	Effective July 1, 2026
	Current Monthly	Proposed Monthly	Proposed Monthly	Proposed Monthly
Rate Class	Bill (1)	Bill (2)	Bill (2)	Bill (2)
Residential (RS)	$119.02	$0.98	$1.57	$2.32
Residential Time of Day (RT/RGT)	$164.20	$1.38	$2.25	$3.32
General Service – Secondary (GS)	$612.43	$5.37	$8.68	$12.82
General Service - Secondary Time of Day (GST)	$34,850.66	$263.17	$425.40	$628.33
General Service – Primary (GP)	$48,532.18	$410.40	$663.39	$979.88
General Service – Transmission (GT)	$124,314.63	$1,177.28	$1,902.99	$2,810.86
Lighting (Average Per Fixture)	$11.70	$0.06	$0.09	$0.13

	Class Average Per Customer /Fixture Incremental Increase %			
		Effective January 1, 2025	Effective July 1, 2025	Effective July 1, 2026
	Current Monthly	Proposed Monthly	Proposed Monthly	Proposed Monthly
Rate Class	Bill (1)	Bill (2)	Bill (2)	Bill (2)
Residential (RS)	$119.02	0.8%	1.3%	1.9%
Residential Time of Day (RT/RGT)	$164.20	0.8%	1.4%	2.0%
General Service – Secondary (GS)	$612.43	0.9%	1.4%	2.0%
General Service - Secondary Time of Day (GST)	$34,850.66	0.8%	1.2%	1.8%
General Service – Primary (GP)	$48,532.18	0.8%	1.4%	2.0%
General Service – Transmission (GT)	$124,314.63	0.9%	1.5%	2.2%
Lighting (Average Per Fixture)	$11.70	0.5%	0.8%	1.1%

	Typical Residential Customer on RS Rate			
		Effective January 1, 2025	Effective July 1, 2025	Effective July 1, 2026
	Current Monthly Bill (1)	Proposed Monthly Bill (2)	Proposed Monthly Bill (2)	Proposed Monthly Bill (2)
Residential (RS) using 783 kW per Month	$116.88	$117.85	$119.42	$121.74
Cumulative Increase from Current ($)		$0.97	$2.54	$4.86
Cumulative Increase from Current (%)		0.8%	2.2%	4.2%

{1} Rates effective 10/1/2023

{2} Proposed EE rates at respective dates, all other rates remain the same, includes NJ SUT

The percentage increases noted above are based on rates in effect on October 1, 2023, including applicable Basic Generation Service charges and assume customers receive commodity service from JCP&L. They are also based on current projections that assume full implementation of the Plan as proposed. It is anticipated that JCP&L will make annual filings each year of the Plan to request the Board's approval to implement that program year's revenue requests. The Board's decision in this matter regarding the Plan and its decisions on those annual filings may increase or decrease the dollars and percentage impacts shown above. Any assistance required by customers with regard to bill impacts will be furnished by JCP&L upon request.

The Board has statutory and regulatory authority to approve and establish rates it finds just and reasonable. Therefore, the Board may determine and establish these charges at levels other than those proposed by JCP&L.

The Petition was filed with the Board and a copy was also served upon the Division of Rate Counsel. Copies of the Petition and its attachments are available for review on JCP&L's website: https://www.firstenergycorp.com/jersey_central_power_light/regulatory.html. The Petition is also available to review online through the Board's website, https://publicaccess.bpu.state.nj.us/, where you can search by the above-captioned docket number. The Petition and Board file may also be reviewed at the Board, located at 44 South Clinton Avenue, 1st Floor, Trenton, New Jersey, by appointment. To make an appointment, please call (609) 913-6298.

PLEASE TAKE FURTHER NOTICE that virtual public hearings will be conducted on the following date and times so that members of the public may present their views on the Verified Petition:

Date:
Times:
Link:
Dial-In Number:
Phone Conference ID:
Meeting ID:
Passcode:

When prompted, enter the Meeting ID number to access the meeting.

Representatives from the Company, Board Staff, and Rate Counsel will participate in the virtual public hearings. Members of the public are invited to participate by utilizing the link or dial-in information above and to express their views on the Petition. All comments will be made a part of the final record in this proceeding to be considered by the Board. To encourage full participation in this opportunity for public comment, please submit any requests for needed accommodations, such as interpreters and/or listening assistance, 48 hours prior to the above hearings to the Board Secretary at board.secretary@bpu.nj.gov.

The Board is also accepting written and electronic comments. Comments may be submitted directly to the specific docket listed above using the "Post Comments" button on the Board's Public Document Search tool. Comments are considered public documents for purposes of the State's Open Public Records Act. Only public documents should be submitted using the "Post Comments" button on the Board's Public Document Search tool. Any confidential information should be submitted in accordance with the procedures set forth in N.J.A.C. 14:1-12.3. In addition to hard copy submissions, confidential information may also be filed electronically via the Board's e-filing system or by email to the Secretary of the Board. Please include "Confidential Information" in the subject line of any email. Instructions for confidential e-filing are found on the Board's webpage: https://www.nj.gov/bpu/agenda/efiling/.

Emailed and/or written comments may also be submitted to:

Secretary of the Board
44 South Clinton Ave., 1st Floor
PO Box 350 Trenton, NJ 08625-0350
Phone: 609-913-6241
Email: board.secretary@bpu.nj.gov

JERSEY CENTRAL POWER & LIGHT COMPANY

CONFIDENTIAL

JERSEY CENTRAL POWER & LIGHT

Consolidated Tax Adjustment
BPU Methodology under N.J.A.C 14:1-5.12(a)(11) - Five Years of Data, 100% Sharing, Distribution Only

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2020, 2021 and 2022
ASSETS AND OTHER DEBITS

FERC Account		DECEMBER 31 2020	2021	2022
	UTILITY PLANT			
101-106	Utility plant	7,516,417,582	7,731,710,040	7,859,000,047
107	Construction Work in Progress	237,579,973	251,023,678	379,430,669
	Total Utility Plant	7,753,997,555	7,982,733,718	8,238,430,716
108,111	Less Accumulated Provision for Depreciation	2,222,576,209	2,282,762,965	2,376,692,365
	Net Utility Plant	5,531,421,346	5,699,970,753	5,861,738,351
120.1 - 120.4 and 120.6	Nuclear Fuel			
120.5	Accum. Provision for Amortization			
	Net Nuclear Fuel			
	Net Utility Plant	5,531,421,346	5,699,970,753	5,861,738,351
	OTHER PROPERTY AND INVESTMENTS			
121	Nonutility Property	18,035,333	18,035,333	20,068,900
122	(Less) Accum. Prov. For Deprec. And Amort.	15,898,977	15,906,450	15,913,923
123	Investment in Associated Companies	-	-	-
123.1	Investment in Subsidiary Companies	890,451	-	-
124	Other Investments	752	1,583	1,302
128	Special Funds	283,478	84,775	144,523,209
175	Long-Term Portion of Derivative Assets	-	-	-
	Total Other Property and Investments	3,311,037	2,215,241	148,679,488
	CURRENT AND ACCRUED ASSETS			
131	Cash	-	8,020	227,012
132-134	Special Deposits	283,463,176	283,529,301	269,642,513
135	Working Funds	1,300	1,300	1,300
136	Temporary Cash Investments	-	170,000,000	-
142	Customer Accounts Receivable	151,150,601	142,269,396	136,614,956
143	Other Accounts Receivable	29,895,353	33,748,497	27,414,416
144	(Less) Accum. Prov. For Uncollectible Accounts-Credit	20,199,605	25,827,216	26,535,132
145	Notes Receivable from Associated Companies	37,850,833	-	-
146	Accts. Receivable from Associated Companies	15,660,720	39,477,935	61,152,776
151	Fuel Stock	-	-	-
154	Plant Materials and Operating Supplies	-	-	-
165	Prepayments	26,170,192	25,873,619	26,362,364
171	Interest and Dividend Receivable	-	31,589	-
172	Rents Receivable	5,068,818	3,242,200	5,379,734
173	Accrued Utility Revenues	90,854,001	114,538,533	108,723,005
174	Miscellaneous Current and Accrued Assets	-	-	-
175	Derivative Instruments Assets	-	-	-
175	(Less) Long Term Portion of Derivative Instrument Assets	-	-	-
	Total Current and Accrued Assets	619,915,389	786,893,174	608,982,944
	DEFERRED DEBITS			
181	Unamortized Debt Expenses	5,910,523	9,068,500	7,518,187
182.1	Extraordinary Property Losses	-	-	-
182.2	Unrecovered Plant and Regulatory Study Costs	3,907,879	3,798,871	3,689,863
182.3	Other Regulatory Assets	835,466,280	689,959,524	714,581,231
183	Prelim. Survey and Investigation Charges	2,010,923	2,056,070	2,118,948
184	Clearing Accounts	33,091	1,765,362	1,203,184
185	Temporary Facilities	721,842	966,703	1,033,484
186	Miscellaneous Deferred Debits	1,819,075,608	1,818,208,651	1,822,839,545
188	Research, Devel. And Demonstration Expend.	42,510	42,510	42,510
189	Unamortized Loss on Reacquired Debt	3,642,157	2,764,778	1,887,400
190	Accumulated Deferred Income Taxes	866,332,277	816,074,846	836,523,664
	Total Deferred Debits	3,537,143,090	3,344,705,815	3,391,438,016
	TOTAL ASSETS	9,691,790,862	9,833,784,983	10,010,838,799

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2020, 2021 and 2022
LIABILITIES AND OTHER CREDITS

FERC Account		DECEMBER 31 2020	2021	2022
	PROPRIETARY CAPITAL			
201	Common Stock Issued	136,284,470	136,284,470	136,284,470
204	Preferred Stock Issued	-	-	-
207	Premium on Capital Stock	2,665,505,519	2,665,882,044	2,674,561,942
208-211	Other Paid-In Capital	56,585,306	61,674,229	67,168,927
215, 215.1,216	Retained Earnings	852,666,292	1,049,533,396	1,092,589,450
216.1	Unappropriated Undistributed Subsidiary Earnings	(45,086)	(45,050)	-
219	Accumulated Other Comprehensive Income	(5,600,403)	(5,610,637)	(5,243,179)
	Total Proprietary Capital	3,705,396,098	3,907,718,452	3,965,361,610
	LONG-TERM DEBT			
221	Bonds			
223	Advances From Associated Companies			
224	Other Long-Term Debt	1,650,000,000	2,150,000,000	2,150,000,000
225	Unamortized Premium on Long-Term Debt	4,274,560	3,426,246	2,577,932
226	(Less) Unamortized Discount on Long-Term Debt	3,826,023	4,639,655	4,026,870
	Total Long-Term Debt	1,650,448,537	2,148,786,591	2,148,551,062
	OTHER NON-CURRENT LIABILITIES			
227	Obligations Under Capital Leases	69,504,380	62,473,145	55,177,599
228.2	Accumulated Provision for Injuries and Damages	5,000,550	6,364,322	3,410,466
228.3	Accumulated Provision for Pension and Benefits	277,495,510	154,957,351	73,849,627
	Long-Term Portion of Derivative Instrument Liabilities	-	-	-
230	Asset Retirement Obligation	6,011,221	6,335,162	6,727,135
	Total Noncurrent Liabilities	358,011,661	230,129,980	139,164,827
	CURRENT AND ACCRUED LIABILITIES			
231	Notes Payable	450,000,000	-	-
232	Accounts Payable	160,826,689	146,373,791	160,160,448
233	Notes Payable to Associated Companies	-	71,642,138	65,073,721
234	Accounts Payable to Associated Companies	5,282,828	987,909	1,428,228
235	Customer Deposits	42,996,324	37,026,239	37,292,088
236	Taxes Accrued	8,823,283	25,696,401	2,543,988
237	Interest Accrued	23,023,572	26,548,399	26,535,422
238	Dividends Declared	-	-	-
241	Tax Collections Payable	7,456,503	6,688,311	8,731,269
242	Misc Current and Accrued Liabilities	60,576,542	88,092,395	82,720,379
243	Obligations Under Capital Leases	12,583,763	7,999,567	11,123,422
244	Derivative Instrument Liabilities	-	-	-
	(Less) Long-Term Portion of Derivative Instruments-Hedges	-	-	-
	Total Current and Accrued Liabilities	771,569,504	411,055,150	395,608,965
	DEFERRED CREDITS			
252	Customer Advances for Construction	46,154,354	54,477,103	69,154,494
255	Accumulated Deferred Investment Tax Credits	1,523,750	1,392,551	1,261,352
253	Other Deferred Credits	578,367,882	578,417,254	794,384,393
254	Other Regulatory Liabilities	918,357,082	811,288,903	762,920,837
257	Unamortized Gain on Reacquired Debit	-	-	-
282	Accum. Deferred Income Taxes-Other Property	1,183,580,376	1,231,294,522	1,240,977,774
283	Accum. Deferred Income Taxes-Other	478,381,618	459,224,477	493,453,485
	Total Deferred Credits	3,206,365,062	3,136,094,810	3,362,152,335
	TOTAL LIABILITIES AND OTHER CREDITS	9,691,790,862	9,833,784,983	10,010,838,799

APPENDIX E

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Income Statement at
For the Years 2020, 2021 and 2022

FERC Account		DECEMBER 31 2020	2021	2022
	UTILITY OPERATING INCOME			
400	Operating Revenues	1,767,146,543	1,811,088,364	2,054,784,763
	Operating Expenses:			
401	Operation Expenses	1,228,038,290	1,067,848,137	1,395,097,323
402	Maintenance Expenses	281,536,414	155,604,723	146,917,288
403	Depreciation Expenses	182,725,883	172,574,764	196,864,186
	Depreciation Expenses for Asset Retirement Costs (403.1)	82,159	82,159	82,159
404-405	Amortization and Depl. Of Utility Plant	10,472,336	11,299,336	11,176,883
406	Amortization of Utility Plant Acq. Adjustment	-	-	-
407.3	Regulatory Debits	30,777,092	157,275,996	46,121,817
407.4	(Less) Regulatory Credits	223,542,683	107,952,504	29,588,384
408.1	Taxes Other Than Income Taxes	12,333,955	11,728,825	9,700,538
409.1	Income Taxes Federal	(14,865,322)	5,289,088	23,039,161
409.1	Other	(2,287,717)	(9,525,634)	(1,240,994)
410.1	Provision for Deferred Income Taxes	507,526,576	422,915,747	397,963,255
411.1	(Less) Provision for Deferred Income Taxes-Cr	474,143,885	359,971,610	398,798,696
411.4	Investment Tax Credit Adj.- Net	(131,199)	(131,199)	(131,199)
411.1	Accretion Expense	9,238,991	369,078	391,974
	Total Utility Operating Expenses	1,547,760,890	1,527,406,906	1,797,595,311
	NET UTILITY OPERATING INCOME	219,385,653	283,681,458	257,189,452
	OTHER INCOME AND DEDUCTIONS			
	Other Income:			
415	Revenues from Merchandising, Jobbing and Contract Work	2,465,283	579,537	641,854
416	(Less) Costs and Expenses of Merch., Job and Contract Work	2,069,600	1,248,184	1,089,246
417	Revenues from Nonutility Operations	-	-	-
417.1	(less) Expenses of Nonutility Operations	-	66	-
418	Nonoperating Rental Income	(7,438)	(7,473)	(7,473)
418.1	Equity in Earnings of Subsidiary Companies	4,926	139	-
419	Interest and Dividend Income	5,316,821	6,377,937	10,398,072
419.1	Allowance for Other Funds Used During Construction	1,253,018	6,429,295	10,947,118
421	Misc. Nonoperating Income	1,555,107	844,889	1,559,905
421.1	Gain on Disposition of Property	10,990	109,854,093	2,665,556
	Total Other Income	8,529,107	122,830,167	25,115,786
	Other Income Deductions:			
421.2	Loss on Disposition of Property	2,521,427	457,242	262,652
426.1	Donations	187,254	218,130	393,461
426.2	Life Insurance	(1,387,745)	(1,116,298)	1,719,236
426.3	Penalties	47	199,604	245,337
426.4	Exp. For Certain Civic, Political & Related Activities	546,199	537,479	542,226
426.5	Other Deductions	(2,666,577)	10,115,583	53,370,711
	Total Other Income Deductions	(799,395)	10,411,740	56,533,623
	Taxes Applicable to Other Income and Deductions:			
408.2	Taxes Other Than Income Taxes			
409.2	Income Taxes - Federal	3,472,087	20,351,749	2,753,882
409.2	Income Taxes - Other	1,579,352	9,528,843	1,240,994
410.2	Provision for Deferred Income Taxes	182,006	35,152,184	377,413
411.2	(Less) Provision for Deferred Income Taxes - Cr.	2,056,193	36,342,095	503,169
411.5	Investment Tax Credit Adjustment - Net	-	-	-
	Total Taxes on Other Income and Deductions	3,177,252	28,690,681	3,869,120
	NET OTHER INCOME AND DEDUCTIONS	6,151,250	83,727,746	(35,286,957)
	INTEREST CHARGES			
427	Interest on Long-Term Debt	82,700,000	90,377,083	96,450,000
428	Amort. Of Debt Disc and Expense	1,613,702	1,907,437	2,163,098
428.1	Amortization of Loss on Reacquired Debt	877,378	877,378	877,379
429	(Less) Amort. Of Premium on Debt-Credit	848,314	848,314	848,314
429.1	(Less) Amortization of Gain on reacquired Debt-Credit	18,501	-	-
430	Interest on Debt to Assoc. Companies	1,444,124	350,271	530,171
431	Other Interest Expense	7,847,106	11,006,955	9,604,293
432	(Less) Allowance for Borrowed Funds Used During Construction-Cr.	5,562,648	3,128,746	4,975,236
	Net Interest Charges	88,052,847	100,542,064	103,801,391
	Income Before Extraordinary Items			
	NET INCOME	137,484,056	266,867,140	118,101,104

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2022
ASSETS AND OTHER DEBITS

FERC Account		June 30, 2023
	UTILITY PLANT	
101-106	Utility plant	8,040,180,094
107	Construction Work in Progress	420,314,412
	Total Utility Plant	8,460,494,506
108,111	Less Accumulated Provision for Depreciation	2,443,550,309
	Net Utility Plant	6,016,944,197
120.1 - 120.4 and 120.6	Nuclear Fuel	
120.5	Accum. Provision for Amortization	-
	Net Nuclear Fuel	
	Net Utility Plant	6,016,944,197
	OTHER PROPERTY AND INVESTMENTS	
121	Nonutility Property	20,068,901
122	(Less) Accum. Prov. For Deprec. And Amort.	15,917,656
123	Investment in Associated Companies	-
123.1	Investment in Subsidiary companies	-
124	Other Investments	982
125-128	Special Funds	158,413,621
175	Long-Term Portion of Derivative Assets	-
	Total Other Property and Investments	162,565,848
	CURRENT AND ACCRUED ASSETS	
131	Cash	231,575
132-134	Special Deposits	272,410,152
135	Working Funds	1,300
136	Temporary Cash Investments	-
142	Customer Accounts Receivable	102,703,869
143	Other Accounts Receivable	39,096,021
144	(Less) Accum. Prov. For Uncollectible Accounts	22,309,023
145	Notes Receivable from Associated Companies	-
146	Accts. Receivable from Associated companies	60,567,444
151	Fuel Stock	-
154	Plant Materials and Operating Supplies	-
165	Prepayments	79,014,492
171	Interest and Dividend Receivable	-
172	Rents Receivable	4,618,597
173	Accrued Utility Revenues	100,562,897
174	Miscellaneous Current and Accrued Assets	165,687
175	Derivative Instruments Assets	-
175	(Less) Long Term Portion of Derivative Instrument Assets	-
	Total Current and Accrued Assets	637,063,011
	DEFERRED DEBITS	
181	Unamortized Debt Expenses	6,743,031
182.1	Extraordinary Property Losses	-
182.2	Unrecovered Plant and Study Costs	3,635,359
182.3	Other Regulatory Assets	747,250,572
183	Prelim. Survey and Investigation Charges	2,119,217
184	Clearing Accounts	994,289
185	Temporary Facilities	1,006,832
186	Miscellaneous Deferred Debits	1,825,549,887
188	Research, Devel. And Demonstration Expend.	42,510
189	Unamortized Loss on Reacquired Debt	1,488,106
190	Accumulated Deferred Income Taxes	849,504,362
	Total Deferred Debits	3,438,334,165
	TOTAL ASSETS	10,254,907,221

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2022
LIABILITIES AND OTHER CREDITS

FERC Account		June 30, 2023
	PROPRIETARY CAPITAL	
201	Common Stock	136,284,470
204	Preferred Stock Issued	-
207	Premium on Capital Stock	2,674,561,942
208-211	Other Paid-In Capital	69,798,613
215, 215.1,216	Retained Earnings	1,143,170,109
216.1	Unappropriated Undistributed Subsidiary Earnings	-
219	Accumulated Other Comprehensive Income	(5,060,808)
	Total Proprietary Capital	4,018,754,326
	LONG-TERM DEBT	
221	Bonds	
223	Advances From Associated Companies	
224	Other Long-Term Debt	2,150,000,000
225	Unamortized Premium on Long-Term Debt	2,153,775
226	(Less) Unamortized Discount on Long-Term Debt	3,720,477
	Total Long-Term Debt	2,148,433,298
	OTHER NON-CURRENT LIABILITES	
227	Obligations Under Capital Leases	49,541,493
228.2	Accumulated Provision for Injuries and Damages	11,253,028
228.3	Accumulated Provision for Pension and Benefits	61,755,437
	Long-Term Portion of Derivative Instrument Liabilities	-
230	Asset Retirement Obligation	6,932,150
	Total Noncurrent Liabilities	129,482,108
	CURRENT AND ACCRUED LIABILITIES	
231	Notes Payable	-
232	Accounts Payable	195,894,719
233	Notes Payable to Associated Companies	248,348,297
234	Accounts Payable to Associated Companies	468,788
235	Customer Deposits	37,044,448
236	Taxes Accrued	7,913,887
237	Interest Accrued	26,595,810
238	Dividends Declared	-
241	Tax Collections Payable	316
242	Misc Current and Accrued Liabilities	57,281,205
243	Obligations Under Capital Leases	10,993,547
244	Derivative Instrument Liabilities	-
	(Less) Long-Term Portion of Derivative Instruments-Hedges	-
	Total Current and Accrued Liabilities	584,541,017
	DEFERRED CREDITS	
252	Customer Advances for Construction	76,752,296
255	Accumulated Deferred Investment Tax Credits	1,195,752
253	Other Deferred Credits	794,575,888
254	Other Regulatory Liabilities	728,144,824
257	Unamortized Gain on Reacquired Debit	-
282	Accum. Deferred Income Taxes-Other Property	1,263,354,986
283	Accum. Deferred Income Taxes-Other	509,672,726
	Total Deferred Credits	3,373,696,472
	TOTAL LIABILITIES AND OTHER CREDITS	10,254,907,221

Appendix G

JERSEY CENTRAL POWER & LIGHT COMPANY
Rider RRC
Accounting Treatment for Proposed Cost Recovery

Item	Description of Accounting	FERC Account Name	FERC Acct #	Debit	Credit
1)	Program Expenditures-Capitalized	Other Regulatory Asset	182.3	$XX	
	as Regulatory Asset	Cash	131		$XX
2)	Program O&M Expense-Current Period	Outside Service O&M	923	$XX	
	expense of Program O&M Expense	Cash	131		$XX
3)	Amortization of Regulatory Asset-Amortized	Regulatory Debits	407.3	$XX	
	over 10 Years	Other Regulatory Asset	182.3		$XX
4)	Deferred Income Tax Recognition	Provision for Deferred Income Tax	410.1	$XX	
		Deferred Income Taxes Other	283		$XX
5)	Revenue Recognition -Receipt of Revenue	Customer Accounts Receivable	142	$XX	
	requirement comprised of Rate of Return,	Revenue EE&C	440-444		$XX
	Amortization of Regulatory Asset, and O&M				
6)	To Record Over/Under Recovery	Other Regulatory Asset	182.3	$XX	
		Regulatory Credits	407.4		$XX
		Regulatory Liability	253		$XX
		Regulatory Debits	407.3	$XX	
7)	To Record Carrying Costs on Over/Under Recovered Balance	Other Regulatory Asset	182.3	$XX	
		Interest Income	419		$XX
		Regulatory Liability	253		$XX
		Other Interest Expense	431	$XX	

Appendix H

JERSEY CENTRAL POWER & LIGHT COMPANY

Statement of the Amount of Total Revenue Derived in Calendar Year 2022 From Intrastate Sales and Services at Current Rates

Line #	Description	FERC Form-1 Page	FERC Form-1 Line	Notes	2022
1	Total Electric Operating Revenues	300	27		$ 2,054,784,763
2	Exclude: Contra Revenue Amounts in FERC 445	300	7		$ -
3	Revised Total Electric Operating Revenues				$ 2,054,784,763
4	Exclude: Sales for Resale Revenues	300	11		$ 7,737,956
5	Revised Total Electric Operating Revenues				$ 2,047,046,807
6	Total Add Back: Intrastate Sales for Resales				$ 2,553,423
7	Total Intrastate Revenues				$ 2,049,600,230

JERSEY CENTRAL POWER & LIGHT COMPANY
Transactions with Associated (Affiliated) Companies
For the 12 Months Ended December 31, 2022

DESCRIPTION OF SERVICE	NAME OF AFFILIATED COMPANY	AMOUNT
Provide President & CEO Support	FirstEnergy Service Company	$ 4,113,055
Provide Transmission & Distribution Support	FirstEnergy Service Company	$ 41,960,318
Provide Compliance & Regulated Services Support	FirstEnergy Service Company	$ 2,628,848
Provide Customer Support	FirstEnergy Service Company	$ 21,434,191
Provide SVP & Chief Financial Officer	FirstEnergy Service Company	$ 253,836
Provide Information Technology Support	FirstEnergy Service Company	$ 25,814,738
Provide Supply Chain Support	FirstEnergy Service Company	$ 7,845,765
Provide Accounting & Tax Support	FirstEnergy Service Company	$ 14,649,082
Provide Treasury Support	FirstEnergy Service Company	$ 723,779
Provide Strategy, LT Planning & Business Performance Support	FirstEnergy Service Company	$ 809,078
Provide Risk Support	FirstEnergy Service Company	$ 1,995,713
Provide Internal Auditing Support	FirstEnergy Service Company	$ 773,409
Provide Legal Support	FirstEnergy Service Company	$ 5,748,185
Provide Rates & Regulatory Affairs Support	FirstEnergy Service Company	$ 2,959,793
Provide Corporate Affairs & Community Involvement Support	FirstEnergy Service Company	$ 461,569
Provide External Affairs Support	FirstEnergy Service Company	$ 608,894
Provide Ethics & Compliance Support	FirstEnergy Service Company	$ 1,264,449
Provide Human Resources & Corporate Services Support	FirstEnergy Service Company	$ 10,240,077
Provide Corporate Responsibility and Communications Support	FirstEnergy Service Company	$ 1,260,103
Inventory Carrying Charges on Service Company Assets	FirstEnergy Service Company	$ 5,957,353
Interest Expense - Regulated Money Pool	FirstEnergy Corp.	$ 530,171
Transmission Charge - TMI Unit 1	Mid-Atlantic Interstate Transmission, LLC	$ 1,998,563
Transmission Investment Power Pool Agreement	Mid-Atlantic Interstate Transmission, LLC	$ 1,762,524
Rent - Akron Control Facility	American Transmission Systems, Inc.	$ 2,181,112
Rent - Wadsworth Facility	American Transmission Systems, Inc.	$ 2,119,460
Rent - Center for Advanced Energy Technology (CAET)	American Transmission Systems, Inc.	$ 1,302,684
Rent - West Akron Campus	FE Properties Inc	$ 577,272
Rent -Bethel Warehouse	Metropolitan Edison Company	$ 284,559
Rent - Pottsville Pike building	Metropolitan Edison Company	$ 614,427
Rent - Fairmont Corporate Center	Monongahela Power Company	$ 929,617
Rent - Monongahela Power Headquarter Facility	Trans-Allegheny Interstate Line Company	$ 347,798
Rent - Greensburg Corporate Center	West Penn Power Company	$ 949,680
Outside Services		
	Total	**$ 165,100,101**

Accommodation or Convenience Payments:		
Purchased Power		$ 786,687,140
Interest on Debt		$ 96,450,000
Taxes		$ 191,442,599
Payroll (JCP&L)		$ 194,717,523
Employee Benefits		$ 36,926,828
NJ Agent Payments (Clean Energy Payments)		$ 61,220,813
USF Payments		$ 63,729,426
Lease Payments		$ 8,606,148
Other Convenience Payments		$ 689,779,182
Total Accommodations or Convenience Payments		**$ 2,129,559,659**

Jersey Central Power & Light
Statement of Income -
Distribution Earnings Test

Twelve Months ended June 2023

Line No.		Adjusted
1	Operating Revenues	$650,617,821
2	Operations and Maintenance	$ 284,312,368
3	Depreciation & Amortization Expense	156,920,649
4	Taxes Other Than Income Taxes	7,535,872
5	Regulatory Debit	32,069,088
6	Regulatory Credit	66,966
7	Income Taxes	$27,346,818
8	Total Operating Expenses	$ 508,251,761
9	Operating Income	$142,366,060
10	Interest Expense	$71,961,127
11	Net Income	$70,404,933
12	**RETURN ON AVERAGE EQUITY (Associated with Proprietary Capital)**	**2.40%**

	Ratemaking Adjustment to O&M:			Distr Alloc b/	Distr M-T-M
13	Remove O&M M-to-M expense add delayed recognition:	Pension O&M	5,423,953		
14		OPEB O&M	10,814,390		
15			$ 16,238,344	91.55%	$ 14,866,204
16	Increase to Income taxes	28.11%			($4,178,890)
17	After tax expense impact from the mark-to-market adjustment				$ 10,687,314

	Equity:	Amount (6/30/22)	Amount (6/30/23)	Distribution %	Avg Dist Equity
18	Common Stock	$136,284,470	$136,284,470		
19	Premium on Common Stock	$2,665,882,044	$2,674,561,942		
20	Other Paid-In Capital	$64,428,160	$69,798,613		
21	Retained Earnings	$1,076,835,283	$1,143,170,109		
22	Unappropriated Retained Earnings	($45,050)			
23	Accumulated Other Comprehensive Income	($5,427,779)	($5,060,808)		
24	Total Proprietary Capital	$3,937,957,128	$4,018,754,326	73.89%	$2,939,607,047

EXHIBIT JC-2

BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs ("JCP&L EE&C Plan II Filing")

Direct Testimony

of

Edward C. Miller

On Behalf of
Jersey Central Power & Light Company

TABLE OF CONTENTS

I. INTRODUCTION AND BACKGROUND

Q. Please state your name and business address.

A. My name is Edward C. Miller, and my business address is 800 Cabin Hill Drive, Greensburg, Pennsylvania 15601.

Q. By whom are you currently employed and in what capacity?

A. I am currently employed by FirstEnergy Service Company as Manager, Compliance & Development in the Energy Efficiency Department. I am responsible for development and compliance activities related to Energy Efficiency ("EE") and Peak Demand Reduction ("PDR") Programs for the FirstEnergy utilities in Ohio, Maryland, New Jersey, Pennsylvania, and West Virginia. This primarily involves the development of programs and filings to meet the FirstEnergy utilities' EE and PDR requirements and obligations in those states. I report to the Director, Compliance and Reporting in FirstEnergy's EE Department.

Q. Please briefly describe your professional background, prior experience, and qualifications.

A. I hold a Bachelor of Science degree in electrical engineering from the University of Pittsburgh.

For over seventeen years, I was employed by Allegheny Energy Service Corporation, the service company for Allegheny Energy Inc. ("Allegheny"), which merged in 2011 with FirstEnergy Corp. While with Allegheny, I held various engineering, customer service and management positions in Customer Services, Sales & Marketing, Customer Management and Energy Efficiency departments. After the merger, I was assigned my current position as Manager, Compliance & Development.

I have provided testimony before the Pennsylvania Public Utility Commission, the West Virginia Public Service Commission, the Public Utilities Commission of Ohio, and the Maryland Public Service Commission relating to EE and PDR Programs, which I helped to develop.

Q. Have you previously testified in New Jersey Board of Public Utilities ("BPU" or "Board") proceedings?

A. Yes, I testified on behalf of Jersey Central Power & Light Company ("JCP&L" or the "Company") in the following matters: In the Matter of the Implementation of P.L. 2018, C. 17, the New Jersey Clean Energy Act of 2018, Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, BPU Docket No. QO19010040; In the Matter of the Clean Energy Act of 2018 - Utility Demographic Analysis, BPU Docket No. QO19060748; and In the Matter of Electric Public Utilities and Gas Utilities Offering Energy Efficiency and Conservation Programs, Investing in Class I Renewable Energy Resources and Offering Class I Renewable Energy Programs in Their Respective Service Territories on a Regulated Basis, Pursuant to N.J.S.A. 48:3-98.1 and N.J.S.A. 48:3-87.9 – Minimum Filing Requirements, BPU Docket No. QO17091004. My prior testimony relates to JCP&L's Energy Efficiency and Conservation ("EE&C") Plan for Triennium 1 ("EE&C Plan I"), including EE and PDR Programs that are currently in effect. I have also provided testimony supporting the development and approval of numerous EE&C plans in other states served by FirstEnergy affiliates as listed above.

II. SCOPE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I am testifying in support of JCP&L's proposed EE&C Plan for Triennium 2 ("EE&C Plan II" or the "Plan"), which consists of ten EE Programs, one Demand Response ("DR") Program, and one Building Decarbonization ("BD") Program. These programs are described in detail in EE&C Plan II, which is attached hereto as Attachment A. This testimony and the attached Plan, along with the testimony of Carol Pittavino and Brendon Baatz, contain the information required by the Minimum Filing Requirements ("MFRs") for EE, DR, and BD Program filings of utilities under N.J.S.A. 48:3-98.1, as revised and adopted for Triennium 2. The MFRs are defined in the BPU's Orders Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs, BPU Dockets Nos. QO19010040, QO23030150, QO17091004, dated May 24, 2023 ("the May 24 Order") and July 26, 2023 (the "July 26 Order"), as modified by the Board's Order in Docket No. QO23030150, dated October 25, 2023 (the "October 25 Order") (collectively, the "Orders"). My testimony will highlight significant aspects of the programs proposed in the Plan and will address directly or by reference to the Plan the elements required by the MFRs. The accompanying testimony of Brendon J. Baatz of Gabel Associates, Inc. addresses the results of the Benefit-Cost Analysis and related MFRs, while the accompanying testimony of Carol A. Pittavino of this Company addresses the Company's proposed revenue requirements, cost recovery mechanisms, bill impacts, and related MFRs.

Q. Please describe and summarize the content of your testimony.

A. Following the Introduction (Section I) and this Scope of Testimony (Section II), my testimony (in Section III) provides an overview of EE&C Plan II, including a description of the ten EE Programs, one DR Program, and one BD Program. For each program, the following information will be provided or referenced: a description; the target markets; incentive structure or ranges; customer financing options; customer access to current and historic energy usage data; contractor roles; estimated customer participants by year; projected energy savings by year; and budgets by year. In Section IV, I discuss the Quantitative Performance Indicators ("QPIs") for the Company and their evaluation, measurement, and verification ("EM&V"). In Section V, I describe the Company's proposed reporting plan.

III. EE&C PLAN II

Q. Please describe EE&C Plan II.

A. As shown in Table 4 of EE&C Plan II, JCP&L is proposing a total budget of approximately $964.2 million for the Plan over Triennium 2. The Plan consists of ten EE Programs designed to achieve energy and demand savings in all customer sectors, one DR Program, and one BD Program. Savings opportunities are offered to the Company's entire customer base of residential, multifamily, and commercial and industrial ("C&I") customers, with specific opportunities for low and moderate income ("LMI"), multifamily, and small business customers.

Q. How does EE&C Plan II reflect the Board's direction in its Orders for Triennium 2, specifically, with respect to EE targets, DR, and BD?

A. EE&C Plan II offers programs that are designed to meet the electric energy saving targets and other requirements established by the Board, to expand the DR Program to additional residential customers and technologies, and to introduce opportunities to participate to small business customers. In addition, JCP&L proposes a BD Program that is primarily designed to encourage customers who currently use fossil fueled equipment in building end-uses to adopt efficient electric equipment to support the objective of achieving net source program energy savings on a fuel-neutral one million British thermal units ("MMBtu") basis. These BD incentives and initiatives are designed to align with and leverage the incentives and initiatives for measures available through the EE Programs and include incentives for make-ready work (e.g., wiring upgrades) necessary for system conversions. The Plan includes additional information directed by the Orders pertaining to: quality control and customer complaint resolution; workforce development and job training; customer access to usage data; the marketing plan; EM&V; the reporting plan; overburdened community standardization; and the financing plan. Additionally, the Plan includes projected values for QPIs, energy savings, budgets, benefit cost analysis, key metrics for DR and BD Programs, and incentives, as well as other supporting information.

Q. How is JCP&L coordinating elements of EE&C Plan II with other utilities?

A. JCP&L has been working with other New Jersey utilities on a coordinated basis since it began developing its current EE&C Plan approved for Triennium 1. Since early 2023, JCP&L's EE&C team has participated in numerous meetings with the other New Jersey utilities to collaborate on updated or new program designs. This effort has resulted in the

development of updated core programs and certain additional initiatives that are consistent in design, with common program elements—including measures, delivery channels, and incentive ranges—to those of the other New Jersey utilities. Collaboration among New Jersey utilities has also resulted in the development of the coordinated Next Gen Savings Program, as well as similar elements of the DR (e.g., smart thermostat load control demand response and incentive ranges) and BD (e.g., measures and incentive ranges) Programs. The Company plans to continue working with the other New Jersey utilities throughout implementation of the Plan to provide consistency in the following areas: common forms for use by customers and contractors; contractor requirements; open and competitive procurement protocols where feasible; customer and property eligibility requirements and processes; eligible measures; incentive ranges; incentive payment processes and timeframes; customer and contractor engagement platforms; data platforms and database sharing among program administrators; and quality control standards and remediation policies. In addition to these specific program elements, the Company has also been collaborating with the other utilities to provide access to financing for qualified EE and BD investments as well as with respect to the use of a Statewide Coordinator ("SWC") System in the delivery of programs that target both electric and gas savings opportunities for customers with overlapping electric and gas utilities.

Q. What is JCP&L's approach to providing programs in EE&C Plan II in overlapping service territories?

A. JCP&L will continue to leverage, in conjunction with the other New Jersey utilities, a SWC System in the delivery of programs that target both electric and gas savings opportunities for customers with overlapping electric and gas utilities. Utilizing a single third-party

entity to serve as a SWC for EE measures and costs that impact more than one utility in situations where gas and electric service territories overlap supports consistency across the State and alignment on coordinated program offerings. This entity provides a software platform to validate the local gas and electric company serving the customer and perform independent allocations of energy savings and costs for coordinated program offerings. These costs and savings will be allocated between the utility that provides the program services (*i.e.*, "Lead Utility") and the utility with whom the services were coordinated (*i.e.*, "Partner Utility") based on the fuel types impacted by the EE measures.

Q. What is the New Jersey Comfort Partners Program ("Comfort Partners")?

A. Comfort Partners is presently run as a statewide Co-Managed Program through New Jersey's Clean Energy Program and provides an opportunity for LMI customers to receive EE measures and upgrades at no cost to participate. Comfort Partners is currently administered by the participating utility members of the Comfort Partners Working Group, which consists of Public Service Electric and Gas, New Jersey Natural Gas, JCP&L, Atlantic City Electric, Elizabethtown Gas, Rockland Electric Company, South Jersey Gas Company, and the Board. Program representatives work with customers in their home to evaluate the home's current level of EE—including but not limited to home heating and cooling systems, water heating, lighting, and major appliances. The Program also educates customers and their family members on how to conserve energy and develop an action plan. In most cases, program representatives install energy saving home improvements to lower energy costs and improve health, safety, and the comfort of the customer's home. Improvements include but are not limited to weather stripping, adding insulation and caulking, and installing energy saving light bulbs and shower heads—all at no cost to the

customer. Comfort Partners is currently run separately from the utilities' Clean Energy Act Programs and is funded through the Societal Benefits Charge.

Q. Is Comfort Partners impacted by this filing?

A. Yes. The Company intends to transition from the existing Co-Managed Comfort Partners Program to a Core Utility managed Income Qualified Program.

The proposed Income Qualified Program would consolidate the Moderate-Income Weatherization Programs currently run as Additional Utility Led Programs with the Co-Managed Comfort Partners Program. To support an orderly transition from the Co-Managed Comfort Partners Program to the Income Qualified Program, Comfort Partners will continue to operate under the existing structure but be included under utility budgets and funded under the Company's Rider Regional Greenhouse Gas Initiative Recovery Charge as a Clean Energy Act Program, and the utilities will engage in a planning period to develop and review processes and refine detailed plans for a transition to be administered as Core Utility Programs beginning in Program Year ("PY") 5. A Comfort Partners Transition Plan providing more detail is included as Appendix I to the Company's Plan.

Q. Please describe the EE programs proposed to be part of EE&C Plan II.

A. EE&C Plan II incorporates Core Utility Programs and Additional Utility Led Programs based on enhancements to existing New Jersey programs and successful programs in New Jersey and other jurisdictions. The Core Utility Programs for residential customers that were continued from Triennium 1 include the Whole Home Program, formerly known as the Existing Homes Program; Energy Efficient Products; and Behavioral, formerly an Additional Utility Led Program known as the Home Energy Education and Management Program. A new Core Program to this Plan is the Income Qualified Program, which, as

previously mentioned, would condense the Moderate-Income Weatherization Program, currently run as an Additional Utility Led Program component of the former Existing Homes Program, with the Comfort Partners Program, currently run as a Co-Managed Program through New Jersey's Clean Energy Program.

For C&I Customers, the continuing Core Programs include the Direct Install Program. Also continuing in this Plan is the former Energy Solutions for Business Program, which included the subprograms Prescriptive/Custom, Energy Management, and Engineered Solutions, and which have been reorganized into two new Programs, the Energy Solutions Program and the Prescriptive/Custom Program.

An additional Core Utility Program that is continuing from Triennium 1 is the Multi-Family Program, which addresses multifamily structures with three or more units.

Regarding the Additional Utility Led Programs (non-Core Utility), the Plan continues and expands the Company's existing DR Program in alignment with the Board's New Jersey DR Guiding Principles,[1] expanding JCP&L's existing Home Optimization & PDR Program, being renamed as the Load Optimization & PDR Program, to target additional customers, including small business customers, and potentially additional customer connected devices. In addition, the Company is adding a Behavioral Demand Response ("BDR") option for residential customers who have advanced metering infrastructure ("AMI"). The new Additional Utility Led Programs include the addition of a BD Program that primarily targets beneficial building electrification measures and technologies. The proposed BD Program will leverage the delivery and incentives processes supporting implementation of EE programs and measures across all sectors,

[1] The New Jersey DR Guiding Principles are set forth in Appendix A to Attachment C to the Board's July 26 Order.

providing incentives, direct installation, and/or financing for a range of electrification measures. In addition, the Conservation Voltage Reduction ("CVR") and Next Generation Savings Programs are other Additional Utility Led Programs new to Triennium 2.

Table 2 from the Company's EE&C Plan II, as included below, provides an overview of the programs included in the Plan, by program type and sector, and provides summary program descriptions:

Table 2: Program Portfolio Plan Summary		
Program	**Program Type**	**Description**
Residential Programs		
Whole Home	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to market rate customers.
Income Qualified	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to income-qualified customers. Includes two pathways (moderate income and low income, i.e. Comfort Partners) with tiered benefits, based on household income and other qualifying factors
Energy Efficient Products	Core Utility	Provides incentives for HVAC, appliances, appliance recycling, consumer electronics, and other energy-saving equipment through a variety of channels.
Behavioral	Core Utility	Provides energy use information, including analytics, and information and tips related to energy conservation via digital and/or mailed reports to residential customers
Commercial & Industrial Programs		
Energy Solutions	Core Utility	Comprehensive program offering various whole-building solutions to energy efficiency upgrades, including energy assessments, engagement, comprehensive services and technical support.
Prescriptive / Custom	Core Utility	Provides opportunities for commercial and industrial facilities to implement individual or groups of efficiency measures based on prescriptive rebates and/or per kwh and per therm financial incentives for custom measures
Direct Install	Core Utility	Provides an energy assessment and financial incentives for the direct installation of energy efficiency measures; the program aims to make energy efficiency upgrades more accessible to small commercial customers
Multifamily		
Multifamily	Core Utility	Provides a variety of options for multifamily properties, to fulfill the needs of this diverse customer segment, including financial incentives for in unit or common areas energy efficiency solutions as well as more comprehensive offerings, such as but not limited to direct install whole-building retrofits.
Additional Utility		
Next Generation Savings	Additional Utility	Targets new technologies and approaches that need training, incentives, or other key elements to help the marketplace understand the value proposition and implement the measure
CVR	Additional Utility	Program that performs engineering analysis to identify and select, and implements, monitors and maintains the reduction of voltage at select Company substations and distribution circuits to reduce customer energy consumption and demand
Building Decarbonization	Additional Utility	Provides rebates for, and financial incentives for the direct installation of, electrification of building heating, water heating, cooking equipment and potentially other measures as applicable protocols are established or in coordination with other utilities
Load Optimization & PDR	Additional Utility	Targets energy and peak demand savings through Behavioral and Load Control components. Behavioral targets customers with smart meters to reduce load through advance notification and post-event feedback. Load Control targets customer connected devices in homes and businesses, including smart thermostats and potentially other measures, to achieve energy and peak demand savings.

Program descriptions, including information about each program required by MFR II a. (i) to (x), are included in EE&C Plan II. Core Residential Programs are described in Section 3a.i; Core C&I Programs are described in Section 3a.ii; and Core Multifamily

Programs are described in Section 3a.iii. Additional JCP&L-led Programs are described in Section 3b.

Q. Please describe the Next Generation Savings Program proposed to be part of EE&C Plan II.

A. The Next Generation Savings ("NGS") Program targets new technologies and approaches that are ready for broader adoption by any customer class, but need additional support, such as enhanced training, customer incentives, or other key elements to help the marketplace understand the value proposition and implement the measure. Technologies under NGS do not necessarily require further testing to prove their technical energy savings potential, but they do need considerable work to identify and address barriers to adoption in the marketplace. This Program provides targeted support to improve timing of market adoption of measures and their addition to program offerings over time, supporting increased program momentum and energy and demand savings in the future. It is critical to establish a Program like this to ensure that New Jersey's utilities and the State will be in a better position to achieve the State's escalating energy savings targets and to accelerate market adoption of those proven technologies and practices. This, in turn, will help New Jersey reach its clean energy and climate-related goals, introduce new solutions for utility customers, and support the development of a clean energy economy. Additional information regarding the NGS Program is provided in Section 3.b.i of EE&C Plan II.

Q. Please describe the Building Decarbonization Program proposed to be part of EE&C Plan II.

A. The Company's BD Program, consistent with the program criteria outlined in Attachment B to the July 26 Order, has been designed to encourage customers who currently use fossil

fueled equipment to adopt efficient electric equipment. Program-eligible measures primarily target common building applications and equipment, including heating and water heating, with incentives for their electrification by residential, C&I, and multi-family customers. The BD Program has also been designed to align with and leverage the companion EE&C Programs in EE&C Plan II and leverages or includes additional measures that support BD, such as weatherization and make-ready work (e.g., wiring upgrades). The Company also plans to offer enhanced incentives for LMI customers to assure that the Program reaches all customer types, similar in nature to enhanced incentives proposed for LMI participation in other EE&C Plan II Programs.

The Company recognizes that electrification measures are new to New Jersey Utility EE&C Plans for this planning period and are untested in New Jersey for many variables, including market adoption, costs, incentives, and cost-effectiveness. The Company will monitor the performance of the Program as well as coordinate with the other New Jersey utilities throughout implementation to identify potential performance improvements. See Section 3.b.ii of the Company's Plan for more information regarding the proposed BD Program. Additionally, projected values for the metrics established by the July 26 Order for BD Programs are provided in Appendix G of the Plan.

Q. Please describe the DR Program proposed to be part of EE&C Plan II.

A. The Company has successfully implemented the Home Optimization & Peak Demand Reduction Program under EE&C Plan I through the use of bring your own device smart thermostats as the control device in the home. The Load Optimization & Peak Demand Reduction Program proposed in EE&C Plan II is an expansion of this existing Program to target additional customers, including residential and small business customers as well as

potentially other connected devices in homes and businesses, such as, but not limited to, water heaters, electric vehicles/chargers, and battery storage systems. Customers participating in this Load Control component will receive an initial enrollment incentive and an annual participation incentive and the Program will allow customers to override the control of their connected devices and to exit the Program at any time without financial penalty. In addition, the Company is expanding the Program to include a BDR component for residential customers with an AMI meter. The BDR component includes the selection and targeting of customers who are not participating in the Load Control component to reduce load on peak load days. Customers will be provided notification messages, via email or telephone, on a day-ahead basis, to motivate them to reduce usage during peak hours, and with feedback after the peak day to reinforce their performance in future peak load days. More information regarding the Load Optimization & Peak Demand Reduction Program is provided in Section 3.b.iii of EE&C Plan II. Additionally, the projected values for the key performance metrics established by the July 26 Order for DR Programs are provided in Appendix G of the Plan.

Q. Please describe the Conservation Voltage Reduction Program proposed to be part of EE&C Plan II.

A. Under the CVR Program, the Company will perform engineering analysis to identify opportunities for energy and demand savings, as well as downward adjustments to voltage settings at select substations and distribution circuits across its service territory to achieve those savings. The Company will monitor the substations and circuits where CVR has been implemented on an annual basis to review, confirm, and maintain the energy and demand savings by readjusting equipment settings to the lower voltage settings. The

monitoring will also include confirmation that voltages are within voltage requirements. Additionally, the Company will build on initial experiences to support implementing CVR on additional circuits throughout Triennium 2. See Section 3.b.iv of EE&C Plan II for additional information regarding the proposed CVR Program.

Q. Please describe the projected energy savings for each program year from EE&C Plan II.

A. Table 3 from EE&C Plan II, as included below, provides the energy and demand savings projected from the EE and DR Programs, and source MMBtu savings from the BD Program by year and in total:

Table 3: Portfolio Plan Projections				
	Energy Efficiency		Demand Response	Building Decarbonization
Program Year[1]	KWh Savings	KW Savings	KW Savings	Source MMBTU Savings
2025	138,480,934	29,249	22,891	3,661
2026	314,264,044	66,405	35,595	14,560
2027	313,250,697	67,331	48,900	14,481
Total	**765,995,675**	**162,985**	**107,387**	**32,701**

[1] Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix A of the Plan provides additional energy savings projections by Program, by year, and in total.

Q. What is the budget each year for EE&C Plan II?

A. Table 4 from EE&C Plan II, as included below, provides the budgets for the EE, DR, and BD programs by year and in total:

Table 4: Summary of Portfolio Costs[1]				
Program Year[2]	Energy Efficiency	Demand Response	Building Decarbonization	Total
2025	$ 171,462,323	$ 4,888,275	$ 6,018,148	$ 182,368,746
2026	$ 360,492,318	$ 7,228,129	$ 19,590,990	$ 387,311,437
2027	$ 365,158,262	$ 9,717,875	$ 19,597,440	$ 394,473,577
Total	**$ 897,112,904**	**$ 21,834,279**	**$ 45,206,578**	**$ 964,153,761**

[1] *Includes Financing Principle*

[2] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

Appendix B of the Plan provides the projected budgets by cost category, by program, by year, and in total.

Q. Did JCP&L coordinate its EE&C Plan II with the other New Jersey investor owned electric and gas utilities?

A. As discussed in more detail earlier in my testimony and in Section 5.0 of EE&C Plan II, JCP&L coordinated extensively with the other New Jersey investor owned electric and gas utilities on the development and design of its Plan and programs to provide coordinated delivery of many programs offerings to customers that involve electric and gas savings opportunities in overlapping electric and gas utility territories. This supports providing common program opportunities to customers on a statewide basis and improved program ally and customer experience regardless of which utility serves as the Lead Utility that delivers and funds the program services to a customer.

Q. What types of program offerings are included in EE&C Plan II that involve electric and gas savings opportunities?

A. As background, there are single fuel measures, electric or gas, that solely provide electric or gas savings (e.g., ENERGY STAR refrigerators), dual fuel measures that provide both electric and gas savings (e.g., smart thermostats), and project-based measures (e.g., home and building retrofit projects) that can result in electric and/or gas savings depending on the project. As JCP&L is an electric utility, its Plan can generally be characterized as

providing electric measures, dual fuel measures, and project-based measures in its capacity as a Lead Utility.

Q. How did JCP&L budget for delivery of coordinated program offerings in its EE&C Plan II?

A. To comply with the Board's directives regarding the consistent delivery of coordinated programs, JCP&L budgeted 100% of the estimated cost to deliver coordinated programs to customers as the Lead Utility. JCP&L did not include estimates in its budget for the electric costs that will be invoiced from its overlapping partner gas utilities when they are acting as Lead Utilities for JCP&L customers.

Q. Why did JCP&L not estimate the electric costs that it will be invoiced from its overlapping partner gas utilities?

A. JCP&L, based on its experience to date, does not believe it is practical or reasonable to estimate, let alone budget with any level of certainty or precision on a measure and program basis, the amount of costs that will be transferred between it and its three separate partner gas utilities in the delivery of multiple coordinated programs that deliver well over 100 measures. There is significant uncertainty associated with customer participation that impacts the ability to estimate savings and costs. Such uncertainty includes but is not limited to whether the participating customer has natural gas or other fossil-fueled equipment, whether the participating customer is served by a partner gas utility, and the significant variability in customer measure selection and project makeup affecting the ratio of electric and gas savings and costs. There is also significant uncertainty and risk associated with reliance on partner utility projections and how they may change over time such as if a partner needs to adjust a program (or programs) to make up for any

underperforming program (or programs) or react to changing market or other conditions. Such uncertainty and risk related to reliance on partner utility projections are exacerbated in situations involving multiple partners, a situation JCP&L is in. If JCP&L were to attempt to budget for all inflows and outflows with its partner gas utilities, it would need to increase its budgets to account for all of the uncertainty and risk.

Q. Does JCP&L have a proposal to help address the uncertainty and risk related to the amount of costs that will be transferred between it and its three separate partner gas utilities for coordinated programs?

A. Yes, JCP&L, in conjunction with other utilities, is proposing an adjustment mechanism to coordinate utility budgets and eliminate potential budget constraints (the "Budget Adjustment Mechanism" which is described in detail in the Company's Petition beginning on page 8). Budget constraints limit customers' access to EE and disrupt the development of a clean energy economy.

Q. Does JCP&L have an estimate of the costs that will be invoiced to its partner gas utilities?

A. JCP&L anticipates that it will invoice between $32 million to $164 million to its partner gas utilities under its EE&C Plan II to cover gas costs where JCP&L is serving as the Lead Utility delivering and funding coordinated program offerings to gas utility customers.

Q. How does the Company intend to implement EE&C Plan II?

A. The Company intends to continue to provide overall administration and oversight of EE&C Plan II and to utilize qualified Third-Party Implementation Contractors ("TPICs") to perform various program implementation and support duties. Specific activities that the Company will oversee include monitoring program performance, the execution of

marketing campaigns, EM&V, quality assurance/quality control activities, and tracking and reporting activities. The Company will use TPICs to provide many program implementation services, including program delivery and fulfillment, marketing, outreach, program and trade ally engagement, application and rebate processing, EM&V, inspections and quality control, and the support, maintenance and hosting of the tracking and reporting software system. More specifically, the Company's implementation strategy will rely on a number of experienced TPICs, program and trade allies, and other entities engaged in EE to promote, deliver, and support successful implementation of the EE, DR, and BD initiatives and programs. Some TPICs will operate as turnkey program delivery contractors while others will provide specific functions across multiple programs.

Q. Please describe the marketing plan for EE&C Plan II.

A. JCP&L will continue to implement marketing campaigns to promote the residential and non-residential programs to all eligible customers across the Company's electric service territory. Customers will be exposed to increasingly expanded or enhanced broad-based EE and DR awareness campaigns, web-based engagement and information, digital advertising, social media, and hard-copy materials to promote awareness and education, as well as tie-ins with other programs to support customer awareness, education, and increased participation in the Company's EE&C Plan II. Further, a combination of strategies will continue to be used to train and support retailers, distributors, and other program and trade allies, including media advertising, outreach community forums, events, and direct outreach. The Company will continue to engage community partners, chambers of commerce, and other local organizations, including those comprised of underrepresented and socially or economically disadvantaged individuals. Educating building owners,

facility managers, and operators about the benefits of EE improvements and improved systems performance, including through educational brochures, customer and partner seminars, program promotional material and platforms, and website content will also be key to promoting the new and improved programs. The Company will also consider utilizing customer information analytics or other targeted energy education outreach to identify and target customers best suited for participation in the programs where applicable. The collective marketing plan strategy is useful for engaging and enrolling eligible customers that may be interested in participating in the programs but who have not heard of or are unaware of such programs, or who do not have time or resources to prioritize investigating and pursuing EE opportunities. The Company's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver marketing campaigns that identify and confront market barriers on an ongoing basis. The Company will pursue evolving approaches to marketing and to employ best practices and consistent messaging, where applicable. To the extent possible, the Company will cross-promote programs to spread awareness of the range of increased and expanded EE opportunities and eliminate barriers to participation. Such marketing campaigns and cross-promotion will also include BD initiatives. Additional marketing considerations for the BD Program will also include the development of educational and outreach materials for program and trade allies to help identify, focus, and promote electrification for good candidates as well as all eligible customers. The BD marketing will include specific communications to highlight decarbonization and other benefits to customers. Marketing campaigns will also continue to be developed to encompass individual and sector level programs and, in each case, market barriers—such as initial cost, customer awareness, and

trade ally awareness—will be identified and addressed. Marketing campaigns will continue to be developed to mitigate the identified market barriers and will be tailored for each program as necessary. See Section 4 of EE&C Plan II for additional information regarding the Company's Marketing Plan.

Q. Please describe the financing plan for the programs within EE&C Plan II.

A. The Company believes that low- to no-cost financing is an important component of its plan to achieve the increasingly aggressive goals and proposes to continue to provide access to financing in Triennium 2. Continuing to provide a financing option to defray the initial investment costs associated with efficiency upgrades or BD projects further promotes increased participation of all qualifying customers. The Company firmly believes that low- to no-cost financing options are an important option for some customers to overcome their financial barriers to participation (e.g., small business or moderate-income residential customers), allowing customers to pay for their investment in efficiency upgrades or BD projects over an extended period of time more aligned with the timing of the benefits provided by the programs. The Company collaborated with other utilities throughout development of its financing plan and updated the eligible program measures, amounts to be financed, and other loan terms to provide a similar financing offering to that offered by other utilities and to improve and expand access to financing under its EE&C Plan II across all customer sectors. Additionally, to provide access to such financing under EE&C Plan II, the Company plans to initially contract with a third-party to administer a program, consistent with the Company's current financing program, that will provide low- to no-interest loan opportunities that are funded by the Company for qualifying customer investments in EE and BD projects, and proposes having the option to move towards

JCP&L administration and/or on-bill repayment during Triennium 2. The Company has budgeted estimated costs for loan principal funded by the Company and administrative costs associated with continuing to provide such loans in Triennium 2. The Company plans to make this financing option available for customer participation across the Residential, Multifamily and C&I Sector Programs where qualifying measures involve a sizeable cost to the customer to participate. Section 4.h. and Table 6 in EE&C Plan II provide additional information regarding the Company's Financing Plan, including a description of the financing options that customers will have available to them at the program level, and eligibility and financing terms.

Q. What quality control standards and remediation policies will be instituted by the Company to ensure the quality of the programs offered in EE&C Plan II?

A. The Company's EE&C team will leverage its program planning and implementation experience implementing EE and DR Programs in New Jersey during Triennium 1 and in other states since 2009 to ensure the quality of the programs. The EE&C team will work with New Jersey utilities, customers, allies, TPICs, and evaluators to deploy quality assurance and quality control measures to ensure its internal and vendor processes are meeting the goals, requirements, and objectives of EE&C Plan II. Such measures may include routine program performance reviews, vendor meetings, surveys, EM&V activities, and project inspections. Additionally, any trade ally or participating contractor will undergo a thorough onboarding review and assessment to ensure that participating contractors are both licensed and insured and that they fully understand program requirements before performing any work on behalf of the Company for a program. Further, routine reviews and assessments will be completed throughout implementation of

the programs to ensure consistent program deployment and execution by vendors to meet program requirements and objectives. The Company will take corrective actions for any identified deficiencies or non-compliance by vendors with program requirements, objectives, or Company standards. See Section 4a of the Plan for more information regarding quality control and remediation policies.

Q. Please describe the workforce development and job-training pipelines proposed by the Company for EE jobs.

A. A strong pool of qualified entities is necessary to meet the increasing requirements and opportunities associated with the EE and BD Programs. Meeting the ambitious program targets will require a significant increase in customer and trade ally participation in EE&C Plan II as JCP&L strives to meet the program targets. The Company will continue to work with the Workforce Development Working Group to discuss and address training needs, career paths, trade ally needs, and contracting provisions. The Company will also work with partner and peer utilities and look for areas of need and opportunities to fill any gaps in training requirements, as well as to identify areas that will require additional resources and partnership opportunities. Additionally, the Company plans to seek to identify and leverage opportunities and develop partnerships with the New Jersey Department of Labor and Workforce Development to generate and fund workforce development initiatives. See Section 4.b. of the Plan for more information regarding the Company's Workforce Development and Job Training Plan.

Q. Please describe the Company's proposal for offering the EE Programs in the PJM Interconnection LLC ("PJM") Base Residual Auction ("BRA").

A. The Orders require electric utilities to offer eligible EE resources from programs they have led into applicable PJM BRAs and/or participate to true up market positions in Incremental Auctions or secondary markets as available or necessary. JCP&L intends to offer eligible EE resources into the PJM capacity market reflecting peak reduction values from programs consistent with the Orders and PJM's governing Manuals 18 and 18B. If JCP&L determines that its participation in the PJM capacity market will not be cost-effective for New Jersey customers—or, in other words, if JCP&L anticipates that the costs required to obtain the revenues will exceed the revenues obtained—the Company will seek a waiver of the requirement. All EE sell offer values and buy bids shall remain confidential as they are considered market sensitive information. The Company will submit confidential reports to Board Staff and Rate Counsel after every auction providing the offered and cleared EE resource MW values and clearing prices. See Section 4.i. of EE&C Plan II for more information regarding the Company's plans for participation in the PJM BRAs.

IV. QUANTITATIVE PERFORMANCE INDICATORS AND THEIR EVALUATION, MEASUREMENT, AND VERIFICATION

Q. Has the Company included QPI values based on the metrics applicable to each program year covered by this filing?

A. Yes. As directed in the July 26 Order (p. 23 and Attachment A, p. 21), the Company has included six QPIs based on the projected values for its EE programs included in EE&C Plan II: (1) Annual Energy Savings, in Source MMBtu; (2) Annual Demand Savings, in Peak MW; (3) Lifetime Energy Savings, in Source MMBtu; (4) LMI and Overburdened Community ("OBC") Lifetime Energy Savings, in Source MMBtu; (5) Small Business

Lifetime Energy Savings, in Source MMBtu; and (6) Cost to Achieve on a $/Lifetime Source MMBtu savings. These performance indicators are calculated on an annual basis, with the annual energy savings consistent with the following Annual Energy Reduction Targets for Electric Distribution Utilities, which are set forth in Table 2 of the October 25 Order and also shown in Plan Table 1: 1.28% in PY2025, 1.57% in PY2026, and 1.56% in PY2027.[2] See Appendix F of the Plan for the QPIs of the Plan.

Q. Does EE&C Plan II include targets for the six QPIs and how are they calculated?

A. Yes. Appendix F of the Plan presents yearly target values for each of the six QPI metrics based on the forecast of measures in the proposed portfolio. The basis for the target for the first metric, Annual Energy Savings, is calculated as the sum of the annual energy savings that result from the measures from the EE Programs in Source MMBtu. The basis for the target for the second metric, Annual Demand Savings, is calculated as the sum of the annual demand savings that result from the coincident PDR from the EE Programs in MW. For the third metric, Lifetime Energy Savings, the total savings are calculated consistent with the first metric, Annual Energy Savings; however, the savings reflect the total savings across the measure lives of each measure in Source MMBtu. For the fourth metric, LMI and OBC Lifetime Energy Savings, the target value is based on the estimated lifetime energy savings from measures planned for LMI and OBC customers in Source MMBtu. The fifth metric, Small Business Lifetime Energy Savings, is an estimate based on the estimated lifetime energy savings from measures planned for small business customers, also in Source MMBtu. Finally, the sixth metric, Cost to Achieve, is the total portfolio costs divided by the total portfolio energy savings in $/Lifetime Source MMBtu. For all

[2] October 25 Order, p. 7 and Attachment A to this testimony, p. 8, Table 1.

metrics, the achieved value will be based on verified energy and demand savings and actual results.

Q. Please provide a description of how the proposed portfolio achieves the targets established by each QPI.

A. The proposed EE&C Plan II includes a robust portfolio of EE programs with a track record of achieving energy savings and peak demand savings for residential, C&I, and multifamily customers. The portfolio features core programs with specific opportunities for LMI customers in the Income Qualified Program, as well as other Company initiatives included as part of the "Additional Utility Led" section of the Plan. The Plan incorporates Core Utility Programs and Additional Utility Led Programs based on enhancements to existing New Jersey programs and successful programs in New Jersey and other jurisdictions. The Plan also continues and expands the Company's existing DR Program in alignment with the Board's DR Guiding Principles and a new start up BD Program that primarily targets beneficial building electrification measures and technologies. The proposed BD Program will leverage the delivery and incentive structures supporting implementation of EE measures in all sectors, providing incentives, direct installation, and financing for a range of electrification measures.

The Core Programs and Additional Utility Led initiatives are based on collaboration with other New Jersey utilities to promote coordinated program design and delivery. The Plan incorporates both near- and long-term energy saving opportunities for customers in all sectors, including single and prescriptive measures, multiple prescriptive and custom measures, direct install, and comprehensive whole building solutions. The Company believes that this Plan will achieve the QPI targets established by the Board, and during the

implementation phase will continue to monitor the plan achievements against the targets throughout the triennium period.

Q. Does EE&C Plan II include projections for the key metrics for DR and BD programs?

A. Yes. Appendix G of EE&C Plan II includes key metrics for the DR and BD programs. All metrics are calculated consistent with the Orders.

Q. Please describe the methodology, processes, and strategies proposed to be used for monitoring and improving portfolio performance of JCP&L's EE and PDR Programs related to the Company's targets established pursuant to the QPIs for EE&C Plan II.

A. Throughout implementation of the programs, JCP&L will continue to perform program oversight and evaluation activities (e.g., surveys, inspections, reviews, and process evaluations, as well as other quality assurance and quality control activities) to monitor program delivery and performance, ensure customer access to programs, and verify quality standards are met, as well as to monitor overall performance and targets relative to QPIs. The Company will take corrective actions for any deficiencies, or conversely opportunities identified, through its oversight and/or evaluation activities, to improve delivery and performance and ensure its conformance with program requirements, objectives, and Company standards.

The Company further recognizes the importance of incorporating EM&V into the EE, DR, and BD Programs and plans to factor this into its program offerings, including through implementation of the proposed programs. EM&V can help assess whether program objectives are being achieved, document energy and non-energy benefits, and inform ongoing or future program enhancements, modifications, and development. There

is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design, implementation, and evaluation are elements in a cyclical feedback process. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

Q. One of the MFRs is to show costs and benefits associated with "workforce development and job training costs, health and safety measures, and outreach to community-based organizations." Where are such costs and benefits found?

A. Costs for workforce development and job training, health and safety measures, and outreach to community-based organizations are shown in Appendix B of EE&C Plan II.

Workforce development helps provide the skill sets required for successful program implementation, as well as an adequate workforce to meet the aggressive targets of EE&C Plan II. This effort is anticipated to result in economic benefits to the State, including job creation. The Plan discusses these benefits in more detail in Section 4b.

Non-energy health and safety benefits can be summarized as follows: "Energy efficiency measures in homes and buildings support health and safety, because they can ensure good air quality, healthy temperatures and humidity levels (to prevent mold), and noise levels. Ways to improve energy efficiency include weatherizing and retrofitting buildings by adding or replacing insulation, windows, heating and cooling systems, and major appliances, among other things. These measures can reduce the incidence and

symptoms of heart and respiratory conditions, allergies, and more. They also provide physical comfort, which supports mental health and well-being."[3]

Non-Energy Impacts are included in the benefit-cost analysis results consistent with the New Jersey Cost Test ("NJCT"), which directs the use of adders versus specific values,[4] and can be summarized as follows: "While measured [Non-Energy Impacts] are more precise than adders, the studies needed to develop values can be costly, time consuming, and difficult for hard to quantify impacts. Adders provide a simpler method to account for NEIs in the absence of specific evaluations that precisely measure their values."[5]

Outreach to community-based organizations is a form of community and customer engagement and marketing which ultimately helps to target and promote the program opportunities to achieve the participation and benefits of the programs. The benefits of the Company's programs are presented in Appendix E of the Plan consistent with the NJCT.

V. REPORTING PLAN

Q. The MFR requires Quarterly Progress Reports, Annual Progress Reports, and Triennial Reports. Please provide JCP&L's plan to comply with these requirements.

A. JCP&L will comply with the reporting requirements for EE, DR, and BD Programs as outlined in the Orders, as well as in related guidance from Board Staff and the Board. In complying with these requirements, the Company will collaborate with other New Jersey utilities through the EM&V Working Group. The reporting plan includes quarterly progress reports, annual progress reports, and a triennial progress report. The Company has already developed an enterprise-wide EE&C Tracking and Reporting System ("T&R

[3] Health and Safety Benefits of Clean Energy | Department of Energy, https://www.energy.gov/eere/health-and-safety-benefits-clean-energy.
[4] May 24 Order, Attachment F, NJCT Triennium 2, pp. 5-6.
[5] *Id.* at p. 14.

System") in partnership with a third-party vendor to support required EE&C reports for EE&C Plan I. The Company will update the system to integrate the EE&C Plan II program offerings and generate reports with format and content consistent with that defined by the Board. The T&R System will exchange data with TPIC databases to gather data to upload key program metrics on a routine basis (e.g., daily, weekly, or monthly) and will ensure data integrity through routine reconciliation processes. In addition, the Company will continue to utilize SAP[6] enterprise software for its financial management and reporting of program costs. The Company will also continue to work with the TPICs and the Company's EM&V consultant on a regular basis to verify the accuracy of data transferred from TPIC databases to the T&R System.

V. CONCLUSION

Q. Please briefly summarize your direct testimony.

A. EE&C Plan II represents a comprehensive portfolio of EE, DR, and BD Programs designed to meet the requirements of the Board's Orders. JCP&L looks forward to further collaboration with the other New Jersey utilities, stakeholders, and the Board, and to successful implementation of its proposed Plan.

Q. Does this conclude your testimony?

A. Yes, although I reserve the right to supplement my testimony. I further note that the Plan workpapers are being provided as Attachment B to this testimony and are designated as confidential.

[6] SAP, which stands for System Applications and Products, is the Company's Enterprise Resource Planning software.

JERSEY CENTRAL POWER & LIGHT COMPANY

Energy Efficiency and Peak Demand Reduction Programs

(For the period January 1, 2025 through June 30, 2027)

Docket Nos. QO19010040; QO23030150 and QO17091004

December 1, 2023

1.0 TABLE OF CONTENT & LIST OF ACRONYMS

Table of Contents

List of Acronyms

A/C	Air Conditioner
AHU	Air Handling Units
AMI	Advanced Metering Infrastructure
ASHRAE	American Society of Heating, Refrigerating, and Air Conditioning Engineers
BD	Building Decarbonization
BOC	Building Operations Certification
BPI	Building Performance Institute
BPU	Board of Public Utilities
BRA	Base Residual Auction
C&I	Commercial and Industrial
CEA	Clean Energy Act of 2018
CEE	Consortium for Energy Efficiency
DI	Direct Install
DLC	Design Lights Consortium
DSM	Demand Side Management
EDC	Electric Distribution Company
EE	Energy Efficiency
EE&C	Energy Efficiency and Conservation
EM&V	Evaluation, Measurement and Verification
EPRI	Electric Power Research Institute
FRR	Fixed Resource Requirement
HE	High Efficiency
HES	Home Energy Score
HP	Horsepower
HPwES	Home Performance with ENERGY STAR
HVAC	Heating Ventilation and Air Conditioning
IA	Incremental Auction
ICAP	Installed Capacity
IT	Information Technology
JCP&L	Jersey Central Power and Light
kW	Kilowatt
kWh	Kilowatt-hour
LED	Light-Emitting Diode
LMI	Low-to-Moderate income
M&V	Measurement & Verification
MFR	Minimum Filing Requirements
MI	Moderate Income
MOPR	Minimum Offer Price Rules
MUSH	Municipalities, Universities, Schools, Hospitals
MW	Megawatt

MWh	Megawatt-hour
MWVBEs	Minority, Women, Veteran and Service-Disabled Veteran Owned Businesses
NJ	New Jersey
NJACCA	New Jersey Air Conditioning Contractors Association
NJAEE	New Jersey Association of Energy Engineers
NJBPU	New Jersey Board of Public Utilities
NJCEP	New Jersey's Clean Energy Program
NJCT	New Jersey Cost Test
NJPHCC	New Jersey Association of Plumbing, Heating, and Cooling Contractors
OBR	On-Bill Repayment
PDR	Peak Demand Reduction
PJM	Pennsylvania, Jersey, Maryland Power Pool/PJM Interconnection, L.L.C.
POS	Point of Sales
PTAC	Packaged Terminal Air Conditioner
PTHP	Packaged Terminal Heat Pump
PY	Plan Year
QA/QC	Quality Assurance/Quality Control
QHEC	Quick Home Energy Check-up
QPIs	Quantitative Performance Indicators
RCx	Retro-Commissioning
RTU	Roof Top Units
SEE Action	State and Local Energy Efficiency Action Network
SEM	Strategic Energy Management
SEMP	Strategic Energy Management Plan
SHEMS	Smart Home Energy Management Systems
SWC	Statewide Coordinator
T&D	Transmission and Distribution
T&R System	Tracking and Reporting System
TPICs	Third-Party Implementation Contractors
TRM	Technical Reference Manual
TVs	Televisions
UCAP	Unforced Capacity
UCT	Utility Cost Test
UEZ	Urban Enterprise Zones
UPS	Uninterruptable Power Supply
VCx	Virtual Commissioning
VFDs	Variable Frequency Drive

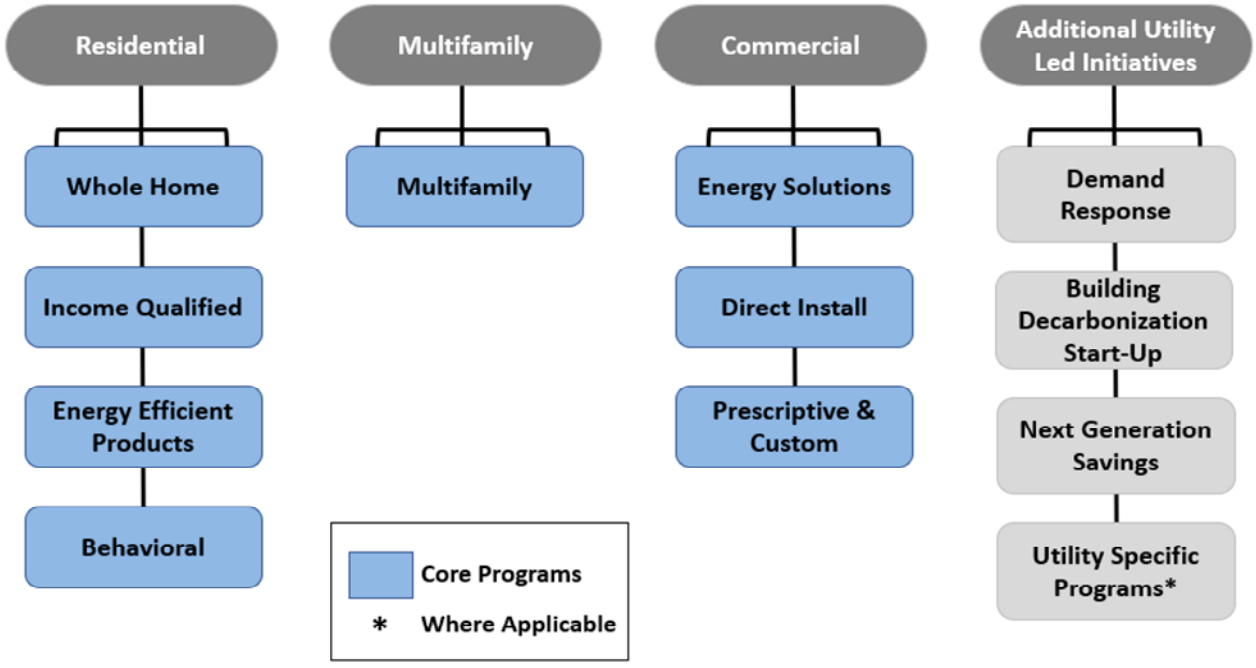
2.0 INTRODUCTION

This Program Plan was developed to address JCP&L's plan for the delivery of Energy Efficiency, Building Decarbonization Start-up and Demand Response programs that JCP&L proposes to offer for Triennium Two which will cover the thirty-month period from January 1, 2025 to June 30, 2027.

Due to the coordinated nature of the core energy efficiency programs, JCP&L, along with the other New Jersey investor-owned utilities, have developed consistent Program Descriptions (MFR II.) that cover the program-specific MFRs (MFR II.a.i - II.a.vi) for all of the core programs. Accordingly, all of the information presented in Section 3a (Core Programs) is consistent information across all of the utility filings. Utility specific information regarding those programs, which aligns with the requirements of MFRs II.a.vii - II.a.x, is presented in the associated supporting Appendices, which match in format, but provide different information for each utility.

The program templates for the Additional Utility Led Initiatives (Section 3b of this program plan) follow a consistent format but contain utility specific proposals, with the exception of the Next Generation Savings program which also provides consistent information across the utilities (in addition to a consistent format).

The graphic below demonstrates the organization of the programs. As discussed above, all programs noted in blue as core have consistent Program Descriptions within each utility's program plan. The Next Generation Savings program also has a consistent Program Description. The descriptions for all other programs are utility specific.



In addition, some information contained in the Portfolio Information section (Section 4) is consistent, while the remaining subsections are utility specific. The following subsections contain consistent information across all of the utilities:

- 4e: Evaluation, Measurement and Verification (MFR VI.)
- 4f: Reporting Plan (MFR VIII.)
- 4g: Overburdened Community Standardization

Sections 4a-4d and Section 4h and 4i each present information specific to each utility.

Additionally, Section 5: Consistent Delivery in Overlapping Territories (MFR II.c.) is consistent among the utilities.

As noted above, all of the appendices are formatted similarly and in the same order, but present utility-specific information, with the exception of Appendix I: Comfort Partners Transition Plan which are consistent for all utilities. Appendix H: Incentive Ranges is formatted similarly, but has some variation due to differences in utility specific program proposals.

Background

The Board of Public Utilities (the "BPU" or the "Board") directed each electric public utility and gas public utility in the State of New Jersey ("NJ") to propose energy efficiency ("EE") and peak demand reduction ("PDR") programs pursuant to the EE provisions of the Clean Energy Act of 2018 (the "CEA" or the "Act") for the second cycle of programs ("Triennium 2") in Orders 8B of May 24, 2023 (the "May 24 Order"), 8C of July 26, 2023 (the "July 26 Order"), and 8G of October 25, 2023 (the "October 25 Order"),[1] in Docket Nos. QO19010040, QO23030150, and QO17091004 (collectively, the "Orders"). In response, Jersey Central Power and Light ("JCP&L" or the "Company") submits, for review and approval by the BPU, this Energy Efficiency and Conservation ("EE&C") Plan ("EE&C Plan II" or the "Plan") that includes a portfolio of programs for Triennium 2.

The CEA directs the BPU to require each electric company to procure or provide cost-effective programs and services with projected verifiable electricity savings that are designed to achieve annual reductions of at least 2% of the average annual electricity usage in the prior three years. The Orders provide guidance for EE and PDR programs pursuant to the Act, the framework for cost-effectiveness screening, and establish a methodology for determining compliance with EE goals.

Attachment C to the July 26 Order directs electric utilities to propose Demand Response ("DR") Programs consistent with the DR Programs Framework, including the DR Guiding Principles, and encourages electric utilities to design such programs to leverage Advanced Metering Infrastructure ("AMI") deployment. The Plan includes a DR Program that aligns with the Board's DR Guiding Principles.

[1] The October 25 Order established that the second cycle of programs are for a 30-month cycle beginning January 1, 2025.

The Orders establish energy use reduction targets, including target percentages for the "Utility Program Annual Energy Savings Target" for Plan Year ("PY") 2025 (January 1, 2025 - June 30, 2025), PY2026 (July 1, 2025 - June 30, 2026), and PY2027 (July 1, 2026 - June 30, 2027). Based on these target percentages and the Company's actual or forecasted retail sales for the period January 1, 2022, through June 30, 2026, the Company's planning targets used in developing the Plan are shown in the following table:

Table 1: Program Year Planning Targets

Program Year [2]	Energy Efficiency Baseline Net MWh[1]	Utility Program Annual Energy Savings Target	Required Energy Efficiency Savings Net MWh	Required Energy Efficiency Savings Net Source MMBTU
2025	20,066,175	1.28%	128,424	1,084,298
2026	20,012,136	1.57%	314,191	2,625,375
2027	20,074,617	1.56%	313,164	2,589,506
Total	**60,152,927**	**-**	**755,778**	**6,299,179**

[1] *Based on actual and forecasted retail sales, excluding wholesale sales, for the prior three-year period for each year (e.g. 2025 based on average of actual retail sales for 2022 and 2023, and forecasted retail sales for*

[2] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order.*

The three-year rolling average EE baselines upon which the EE benchmarks are based, are also shown in Table 1.

In January 2020, the Board released New Jersey's 2019 Energy Master Plan ("EMP"). The EMP identifies the building sector as a key opportunity for reducing energy consumption and greenhouse gas ("GHG") emissions, as aging infrastructure requiring replacement presents near term possibilities for electrification. In February 2023, Governor Murphy signed Executive Order No. 316 , directing that "[i]t is the policy of the State to advance the electrification of commercial and residential buildings with the goal that, by December 31, 2030, 400,000 additional dwelling units and 20,000 additional commercial spaces and/or public facilities statewide will be electrified, and an additional 10 percent of residential units serving households earning less than 80 percent of area median income will be made ready for electrification through the completion of necessary electrical repairs and upgrades."

In accordance with this New Jersey policy, Attachment B to the July 26 Order provides guidance on the establishment of building decarbonization ("BD") start-up programs ("BD Programs"). The Plan includes a BD Program to advance BD and beneficial electrification that aligns with such guidance.

JCP&L designed the programs outlined in EE&C Plan II based on the four primary goals:

1. Comply with CEA and Board Order requirements and directives;
2. Establish a program framework that is adaptable and scalable to meet the aggressive and increasing energy savings targets over time;
3. Continue, improve, and expand the EE&C and DR programs, increasing customer awareness, customer, program and trade ally participation, experience, and momentum for the future; and
4. Include a BD program to align with New Jersey's GHG reduction strategy that will inform future electrification program strategies with regard to cost effectiveness, verification, and other key program variables.

Programs Overview

EE&C Plan II includes a comprehensive portfolio of EE&C programs for the residential, commercial, and industrial ("C&I"), and multifamily sectors, as well as other Company initiatives included as part of the "Additional Utility Led" section of the Plan. The Plan incorporates Core Utility Programs and Additional Utility Led Programs based on enhancements to existing NJ programs and successful programs in NJ and other jurisdictions. The Plan also continues and expands the Company's existing DR Program in alignment with the Board's DR Guiding Principles and introduces a BD Program dedicated to beneficial building electrification measures and technologies. The proposed BD program will leverage the delivery and incentive structures supporting implementation of EE measures in all sectors, providing incentives, direct installation, and financing for a range of beneficial building electrification measures.

The Core Programs and Additional Utility Led initiatives are based on collaboration with other NJ utilities to promote coordinated program design and delivery. The Plan incorporates both near- and long-term energy saving opportunities for customers in all sectors, including single and prescriptive measures, multiple prescriptive and custom measures, direct install, and comprehensive whole building solutions. The table below provides an overview of the Company's Plan, providing, for each proposed program, the program type and a brief description:

Table 2: Program Portfolio Plan Summary		
Program	**Program Type**	**Description**
Residential Programs		
Whole Home	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to market rate customers.
Income Qualified	Core Utility	Comprehensive program providing whole home energy efficiency opportunities, including assessments, to income-qualified customers. Includes two pathways (moderate income and low income, i.e. Comfort Partners) with tiered benefits, based on household income and other qualifying factors
Energy Efficient Products	Core Utility	Provides incentives for HVAC, appliances, appliance recycling, consumer electronics, and other energy-saving equipment through a variety of channels.
Behavioral	Core Utility	Provides energy use information, including analytics, and information and tips related to energy conservation via digital and/or mailed reports to residential customers
Commercial & Industrial Programs		
Energy Solutions	Core Utility	Comprehensive program offering various whole-building solutions to energy efficiency upgrades, including energy assessments, engagement, comprehensive services and technical support.
Prescriptive / Custom	Core Utility	Provides opportunities for commercial and industrial facilities to implement individual or groups of efficiency measures based on prescriptive rebates and/or per kwh and per therm financial incentives for custom measures
Direct Install	Core Utility	Provides an energy assessment and financial incentives for the direct installation of energy efficiency measures; the program aims to make energy efficiency upgrades more accessible to small commercial customers
Multifamily		
Multifamily	Core Utility	Provides a variety of options for multifamily properties, to fulfill the needs of this diverse customer segment, including financial incentives for in unit or common areas energy efficiency solutions as well as more comprehensive offerings, such as but not limited to direct install whole-building retrofits.
Additional Utility		
Next Generation Savings	Additional Utility	Targets new technologies and approaches that need training, incentives, or other key elements to help the marketplace understand the value proposition and implement the measure
CVR	Additional Utility	Program that performs engineering analysis to identify and select, and implements, monitors and maintains the reduction of voltage at select Company substations and distribution circuits to reduce customer energy consumption and demand
Building Decarbonization	Additional Utility	Provides rebates for, and financial incentives for the direct installation of, electrification of building heating, water heating, cooking equipment and potentially other measures as applicable protocols are established or in coordination with other utilities
Load Optimization & PDR	Additional Utility	Targets energy and peak demand savings through Behavioral and Load Control components. Behavioral targets customers with smart meters to reduce load through advance notification and post-event feedback. Load Control targets customer connected devices in homes and businesses, including smart thermostats and potentially other measures, to achieve energy and peak demand savings.

Residential Sector Programs – The residential programs are designed to address both educational and initial cost barriers and to tap a variety of delivery channels and vendors to support customer engagement, education, and participation. The residential programs include direct or targeted programs that engage customers by, among other things, educating them about EE, and serve as a portal for other program offerings by informing them of other program services and opportunities they can leverage. To promote the participation of all residential customers and address initial cost barriers, the residential programs incorporate strategies to change behaviors and include incentives and access to financing. The residential programs provide opportunities for prescriptive equipment incentives and direct installation services for customers who are individually unable or unwilling to undertake whole home/comprehensive solutions. The residential programs also provide opportunities for customers interested in whole home/comprehensive solutions. Additionally, residential customers will be eligible to participate in behavioral or load control (*e.g.,* smart thermostat) DR Program offerings, leveraging AMI deployment to support customer behavioral changes and evaluation of energy savings. Finally, customers will have the opportunity to participate in BD programs (with incentives, direct installation, and/or financing), driving carbon reductions, as

well as source energy efficiencies, across fuels. Customers will be provided education to understand energy and emissions impacts to make well-informed choices.

Throughout implementation of the Plan, JCP&L will strive to identify low- and moderate-income ("LMI") customers and to promote their participation in the Company's program offerings. The Income-Qualified Program provides an opportunity for LMI customers to receive EE measures and upgrades at no cost. This program would consolidate the Moderate-Income Weatherization Program, currently run as an Additional Utility Led Program, with the Comfort Partners Program, currently run as a Co-Managed Program through New Jersey's Clean Energy Program. For PY25, the first year of the Triennium 2, Comfort Partners would continue to operate under the existing structure but be included under utility budgets as a CEA Program and the utilities would refine detailed plans for a transition to be effective in PY26. The Company has also designed certain residential programs to coordinate with its overlapping gas companies. The coordinated programs will provide shared customers of the Company and the overlapping gas companies with access to both gas and electric measures to target greater energy savings opportunities through coordinated program delivery.

Commercial and Industrial Sector Programs – The commercial and industrial ("C&I") programs are similarly designed to engage and educate customers, incorporate strategies to change behaviors, address the initial cost barrier through incentives, and tap a variety of delivery channels and vendors to promote the participation of all C&I customers. C&I customers are also addressed through programs that provide opportunities, including prescriptive rebates, custom measures, direct install, and whole building/comprehensive solutions. The programs include specific opportunities that ensure access for small business customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are individually unable or unwilling to undertake whole building/comprehensive solutions are still able to increase EE. Additionally, the programs provide opportunities for customers interested and able to participate in whole building/comprehensive solutions, encouraging them to consider a holistic approach to EE.

Small business customers with smart meters will also have the opportunity to participate in the Load Control (*e.g.*, smart thermostat) DR program offering. Finally, EE&C programs will be leveraged to offer and provide BD program services supporting beneficial building electrification measures (with incentives, direct installation, and/or financing) that reduce carbon emissions. Customers will be provided education to understand energy and emissions impacts to make well-informed choices.

The Company has also designed certain C&I programs to coordinate with its overlapping gas companies. The coordinated programs will provide customers served by the Company and overlapping gas companies access to incentives and support for implementing both gas and electric measures to target greater energy savings opportunities through coordinated program delivery.

Multifamily Sector Programs – Similar to the residential and C&I programs, the multifamily program is designed to address both educational and initial cost barriers to support customer engagement, education, and participation. The program will be targeted to engage customers and to

educate and inform them about EE, program services, and opportunities upon which they can act. The program incorporates strategies to change behaviors, and, to promote the participation of all customers and address the initial cost barrier, includes incentives and access to financing. The program provides opportunities for direct install and prescriptive equipment, so that customers who are individually unable or unwilling to undertake whole building/comprehensive solutions are still able to increase EE. The program also provides opportunities for customers interested in whole building/comprehensive solutions, encouraging them to consider a holistic approach to EE. Finally, customers will have the opportunity to participate in BD programs (with incentives, direct installation, and/or financing), driving carbon reductions as well as source energy efficiencies, across fuels. Customers will be educated to understand energy and emissions impacts to make well-informed choices. The Company has also designed the multifamily program to coordinate with its overlapping gas companies. The coordinated programs will provide shared customers of the Company and overlapping gas companies with access to both gas and electric measures to target greater energy savings opportunities through coordinated program delivery.

Additional Utility Led Programs – JCP&L has included Additional Utility Led programs as part of EE&C Plan II. More specifically, the Company proposes four initiatives to deliver energy and peak demand savings: (1) a DR program; a (2) BD program; (3) a program that targets market development of new technologies and approaches; and (4) a conservation voltage reduction ("CVR") program.

For DR, the Company proposes to expand the existing Home Optimization & PDR program, which leverages customer connected devices, such as smart thermostats, to include small business customers. The program targets the reduction of customer energy usage in peak periods through customer connected devices (load control). The load control component of the DR program will be expanded to include additional residential customers and small business customers with customer connected devices.

The Company also proposes to expand the DR program to include a Behavioral Demand Response ("BDR") component. The BDR component will select and target customers with smart meters to reduce load on peak load days. Participating customers will receive notice via email or telephone up to 24 hours prior to peak day "events" to support load reductions during peak hours. Participating customers will also receive post-event feedback about their usage performance during the event, with normative comparisons to other customers, and recommendations to reinforce their usage reduction behaviors in future events. In EE&C Plan II, this program is referred to as the Load Optimization & PDR program.

As discussed above, the Plan includes a BD program, which will leverage the delivery of EE&C programs across all sectors to provide incentives, direct installation, and/or financing for a range of beneficial building electrification measures, including building and water heating. The program will also educate customers, enabling them to make well-informed choices when participating in the program.

The Plan also includes a Next Generation Savings program. It targets new technologies and approaches that, while ready for broader adoption, need additional support, such as enhanced training and customer incentives, to help the marketplace understand the value proposition and implement the measure. This program provides targeted support to improve timely market adoption of measures and their addition to program offerings, supporting increased program momentum and energy and demand savings in the future.

The Plan also introduces a CVR Program, under which the Company will perform engineering analysis to identify and implement, and monitor and maintain, voltage reductions at selected substations and distribution circuits across its service territory to achieve additional energy and demand savings.

Collectively, the proposed programs span all sectors and cover all the major energy-consuming devices in the home, building, or business, thus increasing the opportunity for more customers to participate and benefit from one or more programs. Furthermore, the proposed programs promote and support comprehensive whole home/whole building/comprehensive solutions as called for under the Orders.

Other Key Plan Elements

As discussed above and in more detail in Section 4h, to further JCP&L's EE goals, the Company proposes to continue providing access to financing in Triennium 2. The Company believes that low- to no-cost financing will be necessary to achieve the increasingly aggressive goals during Triennium 2, and notes that financing is common in states that achieve high levels of savings. To provide access to financing, initially, the Company plans to contract with a third-party administrator; providing low- to no-interest loan opportunities for qualifying customer investments in EE and BD projects, with the option to move towards utility administration during the Triennium. The Company plans to make this financing option available for customer participation across the residential, C&I, and multifamily, and Additional Utility Led programs where qualifying measures involve a sizeable cost to the customer to participate, including major appliances, heating, ventilation, and air conditioning ("HVAC") equipment, home retrofit and multifamily projects, small business direct install projects, C&I prescriptive and custom measures, and Energy Solutions projects.

JCP&L will also strive to complement its program offerings and increase participation by leveraging incentives available through the Inflation Reduction Act of 2022 (the "IRA"). The IRA establishes incentives for customer investments in clean energy technologies through rebate opportunities and tax credits, with a focus on EE, electrification, and LMI consumers. Together with the other New Jersey utilities, the Company will work with appropriate NJ agencies to leverage IRA programs, after the U.S. Department of Energy makes the funding available to state energy offices. The Company will aim to inform customers who may be eligible for both the Plan and IRA incentives and tax credits so that such customers can leverage the total incentives available to them, further encouraging participation. The Company and its contractors will support customer participation in the State programs, as they are developed, through information and awareness building.

The Plan relies on experienced, outsourced Third-Party Implementation Contractors ("TPICs"), and leverages prior experiences, volume cost efficiencies, and a variety of delivery channels that will support successful and efficient program operations and customer participation. The TPICs will be responsible for managing program operations, including engaging customers and trade allies, and performing program and trade ally engagement, recruitment, and training. To the extent possible, the Company will leverage the existing program implementation processes to support timely program transition and implementation for the EE&C Plan II. The Company will use TPICs to transition and implement the various programs identified in the Plan, which will include, at a minimum, the identification of appropriate staffing skills and levels and the hiring of personnel and contractors, trade ally engagement, recruitment and training processes, and the development of website(s), promotional strategies, and processes, ensuring quality and other controls supporting successful program transition and implementation. The TPICs' transition and start-up phase will include communication and coordination with Company personnel to: (i) present seamless processes for customers, allies, or contractors to participate in the existing and/or new programs; (ii) maximize process efficiency and controls; and (iii) leverage Company relationships and communications with customers. The Company has and will continue to monitor the performance of the TPICs on an on-going basis, and may engage other TPICs, either in addition to, or in place of, current TPICs, if needed throughout implementation of the Plan to support successful program implementation.

JCP&L recognizes the importance of supporting Workforce Development Programs to fulfill new job opportunities and provide the workforce and skills created and required by New Jersey's growing clean energy economy. As discussed in more detail in Section 4b, the Plan includes a commitment to workforce development and job training through participation in the EE Workforce Development Working Group. As a member of this group, the Company will work with peer utilities and/or other New Jersey initiatives to identify areas in the existing workforce that may require additional skills and resource development to support successful implementation of the Company's programs, and to develop or leverage partnership opportunities to efficiently pursue and generate the desired workforce development opportunities. The Company will also consider the amount of business placed with minority, women, veteran, and service-disabled veteran owned businesses ("MWVBEs") when evaluating contract proposals from vendors and contractors, and will promote the hiring of local, underrepresented, and disadvantaged individuals, as well as subcontracting with MWVBEs, by its TPICs.

Projected Savings, Costs. and Cost-Effectiveness Results

The following chart illustrates the energy, demand, and one million British thermal units ("MMBtu") savings results projected under EE&C Plan II for each program year by program type:

Table 3: Portfolio Plan Projections				
	Energy Efficiency		Demand Response	Building Decarbonization
Program Year[1]	KWh Savings	KW Savings	KW Savings	Source MMBTU Savings
2025	138,480,934	29,249	22,891	3,661
2026	314,264,044	66,405	35,595	14,560
2027	313,250,697	67,331	48,900	14,481
Total	**765,995,675**	**162,985**	**107,387**	**32,701**

[1] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

See Appendix A for more information regarding the projected energy savings of the Plan.

JCP&L projects the total costs of EE&C Plan II to average nearly $400 million per year. The chart below provides the summary of portfolio cost by program type, year, and in total:

Table 4: Summary of Portfolio Costs[1]				
Program Year[2]	Energy Efficiency	Demand Response	Building Decarbonization	Total
2025	$ 171,462,323	$ 4,888,275	$ 6,018,148	$ 182,368,746
2026	$ 360,492,318	$ 7,228,129	$ 19,590,990	$ 387,311,437
2027	$ 365,158,262	$ 9,717,875	$ 19,597,440	$ 394,473,577
Total	**$ 897,112,904**	**$ 21,834,279**	**$ 45,206,578**	**$ 964,153,761**

[1] *Includes Financing Principle*

[2] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

To respond to market conditions and customer demand, and to ensure achievement of Plan targets during Triennium 2, the Company may shift the timing of spending between Program Years (which, with the exception of PY2025, run from July 1 through June 30 of the following calendar year). Appendix B provides more information regarding the projected budgets of the Plan.

The successful implementation of the Plan is projected to be cost-effective at the portfolio and sector level under the New Jersey Cost Test ("NJCT"), having benefit-cost ratios greater than 1.0 based on the Company's cost-effectiveness analysis. The table below provides the cost-effectiveness results at the total portfolio and sector level for the NJCT, as well as additional tests completed as supplemental information:

Table 5: Portfolio Summary of Cost-Effectiveness Results						
Sector	Cost - Benefit Ratio (NJ Cost Test)	Cost - Benefit Ratio (Participant Cost Test)	Cost - Benefit Ratio (Program Administrator Cost Test)	Cost - Benefit Ratio (Ratepayer Impact Measure Test)	Cost - Benefit Ratio (Total Resource Cost Test)	Cost - Benefit Ratio (Societal Cost Test)
Residential	1.4	3.3	0.5	0.3	0.6	1.2
Commercial & Industrial	3.2	6.9	0.8	0.6	1.3	2.8
Multifamily	1.5	1.5	1.7	0.7	0.6	1.3
LMI	1.0	3.0	0.2	0.2	0.4	0.9
Total Portfolio	**2.5**	**5.3**	**0.7**	**0.5**	**1.0**	**2.1**

The Company refers the Board to the testimony of Brendon J. Baatz of Gabel Associates, Inc. for detailed information regarding the cost-effectiveness analysis and results of the Plan.

3.0 PROGRAM DESCRIPTIONS

The Utilities will administer the following core programs to engage customers and encourage the pursuit of EE solutions from single transactions to comprehensive upgrades. The Utilities will strive to provide customized guidance wherever possible and provide supporting resources to make EE retrofits more accessible for all customers. Core Programs include:

Residential Core

Whole Home Program: This program provides incentives to encourage customers to understand more about the energy saving opportunities in their home through a home energy assessment and to pursue comprehensive upgrades to their home. Incentives will be offered to encourage these customers to invest in EE.

Income Qualified Program: This program offers eligible LMI customers a free energy assessment to understand more about the energy saving opportunities. These customers can receive EE measures and upgrades, along with potential health and safety measures, with no additional cost for participating.

Energy Efficient Products Program: This program provides incentives for Efficient Products, including retail products, appliance rebates, HVAC equipment, and appliance recycling.

Behavioral Program: This program educates and provides customers with easy-to-understand information about their energy use, the usage of their peers, and suggested actionable steps to generate awareness and motivate customers to achieve energy savings through behavioral changes and engagement with other EE programs.

Commercial Core

Energy Solutions Program: This program is designed to address the needs of C&I customers that are interested in comprehensive EE solutions. Incentives will be offered to encourage these customers to invest in EE.

Prescriptive & Custom Program: This program promotes the installation of high-efficiency electric and/or natural gas equipment to customers, either via the installation of prescriptive or custom measures or projects to C&I customers. Incentives will be offered to encourage these customers to invest in EE.

Direct Install Program: This program is focused on installation of efficiency measures for small businesses, non-profit organizations, municipalities, schools, and faith-based organizations ("eligible customers") that typically lack the time, knowledge, or financial resources necessary to investigate and pursue EE. Incentives will be offered to encourage these customers to invest in EE.

Multifamily Core

Multifamily Program: This program recognizes the variation in property types of multifamily housing and takes a collaborative approach, working in conjunction with customers, to identify the most important efficiency projects with a focus on encouraging more comprehensive projects wherever possible and offering incentives to encourage the investment in EE.

3a. Core Programs

As discussed in the introduction, all core Program Descriptions (covering MFR II.a.i - II.a.vi) are consistent among each utility's Program Plan.

3a.i Residential Sector

The core Residential sector programs are described below and include:

- Whole Home
- Income Qualified
- Energy Efficient Products
- Behavioral

3a.i.1 Whole Home Program

Program Description (MFR II.a.i)

The Whole Home Program consists of two main components:

1. A home energy assessment
2. Incentives and financing options to encourage the customer to pursue the recommended upgrades

The home energy assessment is intended to provide residential customers with an understanding of opportunities to save energy. The home energy assessment will serve as a comprehensive review and may combine the direct installation of standard energy saving measures with the identification of a full-range of potential additional opportunities. The assessment may include various diagnostic testing, such as blower door testing, and provide the option to have assessors install a smart thermostat during the visit.

The home energy assessment may be in person or may leverage videoconferencing software and therefore be virtual or hybrid. The home energy assessments may also target the identification of specific opportunities that may align with other utility programs, including those measures identified in Additional Utility-Led Initiatives.

All assessors will have the necessary qualifications, although these may vary based on the technical needs of the assessment type.

Utilities will strive to prescreen interested customers to determine if they appear to be eligible for the Income Qualified Program which can provide substantial EE improvements at no additional cost to participants. Customers that are identified as eligible for the Income Qualified program will be served directly through that program. However, the utilities recognize that this income eligibility may be determined at a later point and will work to ensure those customers move to treatment under that program to access the no-cost benefits.

During the visit, the assessor will perform a walk-through of the customer's home with the customer to identify opportunities to save energy. The assessors may identify health and safety issues observed and may perform more detailed diagnostic tests on the home. Other opportunities for energy savings may also be offered including making referrals to other EE programs and for program opportunities based on the needs for that premise and the customer's interest in pursuing additional upgrades. This may also include directly proceeding to address weatherization needs and other opportunities, referring to trade allies who are able to support measures offered in other programs, including Additional Utility-Led Initiatives, or sharing information about the products and incentives available under other programs.

Although the program may provide a variety of types of assessment options and additional opportunities in order to best suit the varying needs of its customers, it will promote a holistic approach for customers to explore and invest in the efficiency and comfort of their homes. All participants in this program must have an initial home energy assessment. To ensure the upgrades are accessible to customers, there will be financing available to eligible customers through either an On-Bill Repayment ("OBR") or access to financing with similar terms.

This program is designed to review the entire status of a home, including equipment, and building envelope to achieve deeper energy savings.

Target Market or Segment (MFR II.a.ii)

The Whole Home program will be available to all single-family and single-family attached (1 to 4 unit properties) electric and/or natural gas customers served by at least one of the participating investor-owned utilities in New Jersey. Standard EE measures installed during that visit may include but not be limited to LED bulbs, energy and water saving showerheads, kitchen faucet aerators, bathroom faucet aerators, gaskets, power strips and other energy saving measures. All participants will receive a report that outlines the findings during the appointment and summarizes the measures received, the recommendations made, and the incentives available.

In addition, some utilities may implement an online portal for contractors for cases where the assessments do not directly identify a specific scope of work. Should the customer choose, their assessment can be posted on their lead utility's contractor portal. This portal allows contractors to view customers' assessments and provide an estimate on recommended upgrades and provides customers easy access to participating contractors.

Potential measures incentivized through this program include but are not limited to insulation, air sealing, smart thermostats, HVAC, and water heating. If the customer proceeds with follow-up work within this Whole Home program, the scope of work is required to include air sealing and any necessary building envelope improvements (*e.g.*, insulation) and any required health and safety repairs.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

The utilities will provide the home energy assessment to their interested customers; utilities may provide the home energy assessment at no additional cost or for a fee, which may be discounted for certain customers or for promotional periods to drive activity. The home energy assessment may include the direct installation of standard EE measures that are appropriate for their home. Participating customers may also benefit from receiving EE conservation tips, recommendations for additional opportunities, and referrals to other EE programs based upon the opportunities identified for their home.

Utilities will provide incentives to encourage customers to implement the measures recommended during their assessment. Incentives will be designed to optimize participation through the program and facilitate an easy participation process. The utilities may also provide incentives to contractors related to job completion.

Refer to Appendix H for the Summary of the Existing and Proposed Incentive Ranges for this program. The utilities and/or TPICs will strive to complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

Customer Financing Options (MFR II.a.v)

There is no need for a financing component for the home energy assessment. OBR or access to financing with similar terms will be available to eligible customers for recommended measures installed.

Refer to Section 4h of this Program Plan for the Summary of Proposed Financing for the comprehensive solutions pursued under this program.

Contractor Requirements and Role (MFR II.a.vi)

The utilities will administer and oversee this program and may select a TPIC to manage delivery of this program. Customers who are already working with an approved Whole Home contractor can have the home energy assessment performed directly by that contractor.

The utilities' staff and/or their implementers will oversee all aspects of the program, including training, engagement, and QA/QC. There will be a significant focus on developing, training, and growing a qualified trade ally network. This will include trade ally training sessions, workshops, and opportunities to become approved contractors and to participate in Utility-led workforce development initiatives. Utility staff and/or TPICs may maintain a close relationship with trade allies to ensure consistent program delivery experience and high customer satisfaction.

Trade allies will consist of companies employing trained professionals to complete whole home and a wide range of energy-saving projects. In order to facilitate trade ally access to participants, utilities or the TPIC will maintain a list of companies and professional services where customers can find local trade allies based on geography and other criteria.

The utilities will encourage all participating trade allies to also look for opportunities to promote measures from the Residential Efficient Products program, such as home appliances (*e.g.*, clothes washers) to increase energy savings and leverage those incentives.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.viii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings Relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year (MFR II a.ix), and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.i.2 Income Qualified Program

Program Description (MFR II.a.i)

The Income-Qualified Program provides an opportunity for LMI customers to receive EE measures and upgrades at no cost to participate. This program would condense the Moderate-Income Weatherization program currently run as an Additional Utility Led Program with the Comfort Partners program, currently run as a Co-Managed Program through New Jersey's Clean Energy Program. For the first six-months of the 2nd Triennium, Comfort Partners would continue to operate under the existing structure but be included under utility budgets as a CEA Program and the utilities would refine detailed plans for a transition to be effective in FY26. See Appendix I provides more information on the proposed plan for the transition. For ease of review, this template will address the plans for the condensed Income Qualified program.

As a part of this program, eligible customers will have a comprehensive energy assessment of their home, which may include direct install measures (such as showerheads, faucet aerators, LED bulbs, and power strips) and/or weatherization measures (such as insulation, air sealing, and duct sealing), and energy education. Customers may also be eligible to receive installation, repairs or replacement of water heating, and heating and/or cooling systems. Health and safety measures may also be addressed to enable EE improvements.

During the assessment, in addition to the installation of measures, the program will offer energy education to better understand participants' usage patterns and practices, along with behavioral suggestions to improve the way they use energy in their home. The assessment may include various diagnostic testing such as blower door testing. Based on the assessment recommendations, the participant may also be given the opportunity for additional building envelope measures (such as air sealing and building insulation) to be installed.

The home energy assessment may also target the identification of specific opportunities that may align with other utility programs, including those measures identified in Additional Utility-Led Initiatives.

Target Market or Segment (MFR II.a. ii)

The Income-Qualified Program will be available to income-qualified customers served by at least one investor-owned utility in New Jersey. Eligibility for these enhanced incentives may be determined based on screening an individual customer, categorical eligibility (which may vary for LMI customers), or special screening if the physical location is within the boundaries of a LMI census tract or an Overburdened Community ("OBC"), or any other agreed upon designation by the Board. Please refer to Section 4g of this Program Plan for more information on special treatment for OBC customers. Qualifying guidelines may be adjusted based on updates to federal or state guidelines.

In addition to single family dwellings, the Income Qualified Program can serve multifamily buildings between 2-8 units. Furthermore, all 9 unit or larger multifamily buildings will be directed to the Utilities' multifamily program.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

The customer may receive no-cost EE measures and upgrades with a per project guideline and health and safety expense protocol. The program will be designed to provide a greater level of benefits for low-income customers. Refer to Appendix H for the Summary of Proposed Incentive Ranges for this program.

The utilities and/or the TPICs will strive to complete contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

Customer Financing Options (MFR II.a.v)

All services provided under this program are at no cost to the customer to participate; so, financing is not relevant.

Contractor Requirements and Role (MFR II.a.vi)

Utility staff and/or TPICs will oversee all aspects of the program, including contractor training and engagement, quality assurance, and fulfillment of program services. The home energy assessment and efficiency improvements will be conducted by utility staff, TPICs, and/or program contractors. The utilities and/or TPICs will oversee their staff and subcontractors and engage contractors to educate them on the program benefits to reliably complete the home assessments and install energy efficient equipment and improvements for participating customers. The utilities and/or TPICs will also verify the eligibility of customers and will maintain a close relationship with contractors to ensure a consistent program delivery experience.

Contractors will consist of companies employing qualified professionals who are able to complete assessments and energy-saving projects.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how the utilities will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings Relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.i.3 Energy Efficient Products Program

Program Description (MFR II.a.i)

This program will promote the installation/replacement of energy efficient electric and natural gas equipment by residential customers by offering a broad range of energy efficient equipment and appliances through a variety of channels, which may include an online marketplace, downstream rebates to customers (including but not limited to in-store or online), up-front rebates, reduced point of sale costs, a midstream or upstream component, and a network of trade allies. These sales channels may also be leveraged to promote Additional Utility- Led Initiatives, may provide incentives for energy efficient heating and cooling equipment, water heating equipment, appliances, smart thermostats, as well as other EE products and for appliance recycling. On-bill repayment or access to financing with similar terms will be available for select products.

The program may:

- Provide incentives for products that reduce energy use in the home and provide information about other programs that encourage the installation of high efficiency equipment.
- Provide upstream and/or midstream incentives to retailers and/or distributors.
- Continue to support and/or provide downstream approaches for certain measures.
- Provide online or other channels for customers that include but are not limited to online and in-store eligibility options to acquire select energy efficient products.
- Ensure the participation process is clear, easy to understand, and simple for the customer and contractor.
- Recognize unique barriers that income-qualified customers face and employ strategies to address those barriers, including no cost measures and/or enhanced incentives where appropriate.
- Encourage customers to recycle inefficient appliances.

This program will increase adoption of energy efficient equipment and products by harnessing the unique utility-customer relationship to positively impact the entire sales process surrounding efficient equipment, from education and awareness of customers, engagement with trade ally

contractors and equipment distributors and retailers, to on-bill repayment or access to financing with similar terms for select products.

Utility staff and/or a TPIC may assist with the administration, oversight, and delivery of the program. Activities may include efforts to raise awareness of the program, ongoing refinements to the list of eligible measures, validating customer eligibility, and processing incentives, and conducting outreach to and securing partnerships with retailers, wholesalers, distributors, manufacturers, and trade allies to ensure all customers are able to easily purchase energy efficient products and equipment through the program. Customer engagement and sales channels may include:

- **Post-Purchase (Downstream) Rebates**: Rebates made available to customers after they have made their purchase. Applications may be available online or in stores to submit either electronically or in hard copy with proof-of-purchase.
- **Midstream or Upstream Rebates**: The utilities may pursue a midstream or upstream rebate component to encourage the purchase of certain efficient equipment. The utilities may work with retail partners (such as Home Depot, Lowes, etc.), distributors, or manufacturers to ensure that measures are available throughout the state.
- **Point of Sale Rebates**: Prescriptive rebates made available at the point of sale for select products.
- **Online Marketplace**: The online marketplace is an easy-to-use source for the purchase of efficient products and services. Participants can browse energy efficient equipment and appliances and purchase through the marketplace, which will offer instant rebates. The marketplace may also include non-incentivized items that can help drive traffic, increase uptake in incentivized measures, and expose customers to other utility and/or state offered clean energy programs.
- **Appliance Recycling**: Rebates will be provided to customers for recycling qualifying, inefficient, operating appliances. Offering an incentive for the drop off or pick-up and removal of an appliance prevents the appliance from being maintained as a second unit or transferred to another customer. In addition, periodic events may be offered at centralized drop off locations where customers can drop off qualified inefficient operating appliances. The program may also target appliance retailers for participation or offer bulk appliance recycling.
- **Trade Allies**: A network of trade allies created to promote the program. The trade ally network may consist of qualified installation contractors, plumbers, electricians, and other trade service professionals who meet all applicable statewide requirements for performing the respective service (*e.g.*, HVAC license and insurance requirements). Trade allies will be able to leverage the program and offer customers rebates through their normal course of business.
- **Efficient Product Kits**: Kits to introduce and promote EE technologies that can be easily installed in a customers' home. Similar to the Online Marketplace, the kits can act as a gateway to other programs by including EE&C education and promotional materials for other program opportunities. Where appropriate, the utilities may partner with foodbanks, schools, community organizations, and new customers, and participate in energy assistance outreach events to deliver the kits.

Regardless of the delivery mechanism, the utilities will take steps to ensure customers are made aware of utility engagement in helping to offset upfront costs of the efficient products.

Target Market or Segment (MFR II.aii)

The target market for this program will be all electric and/or natural gas customers served by at least one investor-owned utility in New Jersey. The program is focused on promoting the sale and installation of efficient electric and natural gas equipment across all major residential end-use categories, and can be easily promoted to program allies, trade allies, and customers via rebates. Examples of technologies incentivized through this program include heating/cooling equipment, water heating equipment, electronics, appliances, smart thermostats, water saving measures, weatherization items, pre-packaged kits, and other efficient products. The program will also promote the retirement, recycling, and replacement of old refrigerators, freezers, and other inefficient appliances.

The utilities may offer enhanced incentives for LMI customers. Eligibility for these enhanced incentives may be determined based on screening an individual customer, categorical eligibility (which may vary for LMI customers), or special screening if the physical location is within the boundaries of a LMI census tract, an OBC, or any other agreed upon designation by the Board. Please refer to Section 4g of this Program Plan for more information on special treatment for OBC customers. Qualifying guidelines may be adjusted based on updates to federal or state guidelines.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.A.iv)

The utilities propose to provide a range of incentives depending on the measure, subject to changes based upon customer response and marketplace changes over the plan period. Incentives will vary depending on the specific product, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace. Refer to Appendix H for the Summary of Existing and Proposed Incentive Ranges for this program.

Incentives will be available in several ways. Strategies may include:

- Mail-in applications available from the retailer, the program website, or directly from contractors;
- Online rebate forms;
- Point of Sale, Marketplace, or In-store at the time of purchase;
- Special sale events in retail stores;
- Manufacturer buy down to retailer;
- Midstream or upstream incentives to retailers, distributors, or manufacturers; and
- Partnerships with community groups, schools, and/or non-profit organizations.

In instances where incentives are not immediate, the utilities will strive to complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

Customer Financing Options (MFR II.a.v)

OBR or access to financing with similar terms will be available to eligible customers for select measures.

Refer to Section 4h of this Program Plan for the Summary of Proposed Financing for this program.

Contractor Requirements and Role (MFR II.a.vi)

The utilities and/or TPICs will be responsible for identifying and engaging retail and wholesale entities dealing in energy efficient equipment to on-board them with the program vision, eligible efficient products, rebates, and ways to participate. Additionally, the utility and/or TPICs may engage trade allies, including local HVAC, electrical, plumbing, and other contractors, to educate them on program benefits and build a trade ally network which will install energy efficient equipment for participating customers. The electric utility and/or TPICs may engage with transportation services to pick-up and provide recycling services for old, working appliances. The utility and/or TPICs will also monitor participation to assess the effectiveness of outreach efforts, incentive levels, delivery methods, and both program ally and trade ally availability. The utility and/or TPICs will be responsible for the management of the online marketplace.

By allowing participants to select a trade ally they are comfortable with for select products, the program reduces barriers to entry related to knowledge of EE, confidence in assessments and measure installation. The utilities will perform customer satisfaction and other quality assurance and quality control activities to monitor, ensure, and verify program quality standards are met.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.ii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.i.4 Behavioral Program

Program Description (MFR II.a.i)

The Residential Behavioral program educates and provides customers with easy-to-understand information about their energy use, the usage of their peers, and suggested actionable steps to generate awareness and motivate customers to achieve energy savings through behavioral changes and engagement with other EE programs. Direct mailed and/or electronic home energy reports ("HERs" and "eHERs" collectively) will be the cornerstone of the program and will provide

participants with customized, easy to implement action steps and recommendations to reduce energy consumption and support behavior modification for improved EE. The HERs will present participants with a view of their historical energy consumption compared to peer group customers. Depending upon the availability of metering data and their program design, the utilities may issue usage and/or other bill alerts by email or other means.

The program may also offer an internet-based home energy self-audit to all residential customers. This audit assists customers to better understand their energy usage and opportunities for energy savings.

An online portal may be used to provide customers with usage information, recommendations, tips, and links to other available EE programs. The utilities may utilize the information gathered from various program offerings to not only gain a better understanding of the residential customer base, but also assist in making smart decisions moving forward with EE programs.

The utilities may share other EE program participation information with their respective Behavioral vendor. Incorporating participation feedback into the program on a prospective basis can improve the customer experience and potentially lead to higher engagement (*e.g.*, build higher confidence in relevance of energy saving advice) and participation in other energy saving programs.

Target Market or Segment (MFR II.a.ii)

The program will provide HERs to residential customers for whom sufficient usage data is available and the vendor can cost effectively provide the service and maintain an appropriate control group. This number will be reviewed periodically and may be modified to enhance cost-effective energy savings. The online energy audit may be available to all residential customers per utility. The HERs and online audit may offer tailored recommendations to reduce their energy consumption.

The program targets residential customers potentially including market rate, LMI, and multifamily customers. These customers receive customized energy saving tips and other program opportunities available to them including income-qualified programs.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.A.iv)

There is no cost to participate for customers. Customer incentives to increase engagement may be explored by some utilities.

Customer Financing Options (MFR II.a.v)

Since there is no cost for participating customers, there is no need for a financing component.

Contractor Requirements and Role (MFR II.a.vi)

The utilities will utilize a third-party provider and/or utility staff to provide services under this program. The utilities' HER vendors will distribute HERs to residential customers at no charge to the participant. Customers will also have access to online functionality provided under the

program that all customers can easily utilize to update their profile, see additional tips on how to save energy, complete the online audit tool, and review their usage over time.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.ii Commercial & Industrial Sector

The core Commercial & Industrial sector programs are described below and include:

- Energy Solutions
- Prescriptive & Custom
- Direct Install

3a.ii.1 Energy Solutions Program

Program Description (MFR II.a.i)

The Energy Solutions program is designed to address the needs of C&I customers that are interested in comprehensive EE solutions. This program recognizes that a broad range of approaches is needed to help C&I customers identify, develop, and complete multiple measures to comprehensive projects to save energy and meet other business objectives based on their unique circumstances. Accordingly, this program will include three distinct pathways to help the customers assess their opportunities, provide financial incentives, and provide technical assistance services to encourage and support them to take actions. These three pathways include:

1. Engineered Solutions Tier 1 will provide tailored comprehensive EE support on projects that require significant auditing, technical support, and engineering work. Incentives will be offered to encourage these customers to invest in EE. Engineered Solutions Tier 1 will provide guided consultative service throughout delivery to support customers in identifying and undertaking large EE projects, while requiring no up-front funding from the customer.

   Through Tier 1, customers will be provided with an in-depth audit of their facilities, as well as a detailed assessment and recommendation of EE measures that could be economically installed. Customer incentives are determined on a project-by-project basis. In addition to the calculated project-by-project incentive, participants will have the option to pay back

the non-incentive portion of the project costs through a repayment plan. Through this pathway, larger participants in market segments that have typically been underserved, such as but not limited to municipal, university, school, and hospital ("MUSH") customers, are able to achieve greater energy savings.

2. The Engineered Solutions Tier 2 pathway will provide tailored EE assistance to C&I customers in identifying and undertaking larger EE projects.

   Through Tier 2, customers may be provided with an in-depth audit of their facilities to identify cost effective EE measures that could be economically installed. Customers would also have the option of using contractors who are familiar with the facilities to initiate projects. Under Tier 2, customers have the option to utilize their own engineering & installation contractors. This program will also be open to approved trade allies that meet the program participation requirements. Utilities or their implementor will complete a detailed review of the project to ensure it meets program requirements. In addition to the calculated project-by-project incentive, participants will have the option to pay back the non-incentive portion of the project costs through a repayment plan.

   Tailored assistance services may include audits and additional technical support which will be made available and included in the project cost on an as needed basis.

3. The Energy Management pathway will target energy savings for existing C&I facilities by providing a holistic approach to improving building energy performance through maintenance, tune-up, retro-commissioning, monitoring based commissioning, and virtual commissioning services, and through the implementation of energy savings measures and strategies that improve the overall operation and energy performance of buildings and building systems. Strategic energy management engagement may be utilized to establish on-going relationships with customers that can be leveraged to introduce other applicable EE programs in order to achieve more energy savings for the customer. This pathway complements the Prescriptive and Custom program and the other pathways within this program which targets capital equipment replacement or process improvement investments by improving the energy performance of a building through maintenance, tune-up, adjustment and optimization of the systems within the building and the implementation of complementary energy savings measures. This pathway supports ongoing building energy performance by using retro-commissioning and strategic energy management strategies, which support continued energy performance. By implementing these measures, customers also receive ancillary benefits, including improved occupant comfort, lower maintenance costs, and extended equipment life. This pathway includes focus on specific EE measures and management practices that can be categorized as follows:

   Building Operations

   Building Operations measures provide multiple services for customers to implement building tune-up and maintenance services. These measures are designed to focus on midsize C&I customers and include the following:

   - HVAC Tune-Up: Provides for a tune-up of HVAC systems and includes but is

not limited to the following services:

- Refrigeration charge correction;
- Cleaning evaporator and condenser coils;
- Filter changes;
- Boiler tune-up;
- Furnace tune-up;
- Verification of proper operation of fans and motors; and
- Other minor repairs to refrigerant lines and coils.

- Building Tune-Up: Provides a path for customers to implement a Building Tune-Up that will focus on the adjustment and calibration of building systems and controls, diagnostic testing, and the installation of other complimentary measures that enhance building energy performance and savings. Also includes application of controls to optimize operation of building systems and building operation training for applicable personnel.

Retro-Commissioning

Retro Commissioning ("RCx") measures provide a comprehensive assessment of a customer's C&I building by using a prescribed planning process that includes a building audit, development of an action plan for the building, and development of a Measurement and Verification ("M&V") plan to ensure the optimum ongoing performance of the building and building systems. A comprehensive assessment of a C&I building using a prescribed planning and implementation process includes the following:

1. Audit Phase: Customer confirms intent to participate in the pathway and registers with one of the utilities. Customer and/or the customer's consultant completes the required level of an American Society of Heating, Refrigerating, and Air Conditioning Engineers ("ASHRAE") audit based on the complexity of the facility, develops a RCx implementation plan, including project timelines and a plan to implement audit-identified operation and maintenance measures. There may be opportunities to complete this phase without a full ASHRAE-level audit.
2. Setup Phase: Contracted services to implement the plan are verified, long-term monitoring and reporting is developed and initiated, and a project plan is implemented by the customer.
3. M&V Phase: Savings verification and rebate payment from implementation of the plan is completed.

Typical RCx services include, but are not limited to:

- Optimizing chiller and boiler operations to better match building load conditions;
- Reducing ventilation in over-ventilated areas
- Fixing ventilation dampers that are open when they should be closed or vice versa;
- Decreasing supply air pressure setpoint and system rebalancing; and

- Aligning zone temperature setpoints to match the building's actual operating schedule.

Monitoring-Based Commissioning (MBCx)

Monitoring-Based Commissioning ("MBCx") offers monitoring software paired with a building's energy management system to identify energy savings opportunities and optimize building performance and EE. Contracted services will alert the customer when equipment is not operating as expected using fault parameters and will work with the customer to correct ongoing issues and make improvements wherever possible. Planning and implementation typically includes, but is not limited to:

1. Assessment and qualification of a building energy management system. Assess utility bills and facility to recognize potential for energy savings.
2. Customer agrees to have contracted services utilize eligible software with diagnostics and other functionality through a monitoring service contract.
3. MBCx is designed to:

    - Maximize potential incentives with a deeper dive into a building's overall performance;
    - Monitor and identify cost savings opportunities;
    - Benefit from a continuous process to improve comfort and optimize energy usage; and
    - Maximize the operational efficiency of buildings.

Virtual Commissioning (VCx)

Virtual Commissioning ("VCx") provides eligible customers with an initial analysis of their building's energy performance by using interval meter and or AMI usage data, along with modeling, to identify and recommend potential EE measures and behavioral and/or operational changes to improve a building's overall energy performance. A unique benefit of VCx is the ability to perform analytical prospecting and target customers remotely using data driven analysis, modelling, and/or artificial intelligence. Targeted customers are engaged and individually reviewed to verify the opportunity, develop customized recommendations, and quantify savings potential. The analysis can also foster participation in the utility's other programs by identifying and encouraging customers to implement other EE opportunities. The VCx process can also utilize benchmarking and peer comparison metrics to help determine energy performance to identify facilities that are underperforming. This offering uses continuous engagement, monitoring, reporting, and periodic reviews of customer's energy usage to ensure that implemented measures or changes have been successfully completed.

Strategic Energy Management

The Strategic Energy Management ("SEM") component of this program is designed to optimize energy consumption for larger C&I customers through long-

term management of major energy using systems. SEM provides a holistic approach that is focused on management of existing systems and processes (including behavior), as well as tracking and benchmarking performance to identify and evaluate energy optimization efforts. SEM is a long-term effort typically focused on developing and executing an energy management strategy. This strategy is formulated through a series of site and/or remote visits and interviews with building owners and staff to specifically develop a Strategic Energy Management Plan ("SEMP") for the customer's facility. The SEMP will be reviewed with the customer by the utility and/or its TPIC on a scheduled basis. This plan may include:

- Revisions or improvements to an existing Building Automation System or the addition and initiation of the use of a Building Automation System to monitor and control the buildings components and systems. The implementation or improvements to a system or the review of an existing system can include the proper training for building operators to achieve maximum efficiency.
- Development of a maintenance plan for existing building components and/or systems to identify best practices in building performance and an interactive monitoring of system components by both staff and sponsoring utilities.
- Ongoing engagement to track energy usage and performance, assist with planning EE projects, and interact with facility personnel to adopt EE strategies and behaviors.
- Utilizing other program offerings, including Prescriptive/Custom measures, Building Operations, RCx, and VCx.
- Using building modeling and benchmarking to compare customer's usage and performance to cohort of similar facilities and VCx to track energy usage and performance over time.
- Application of whole building energy modeling tools that can model buildings for both operational and capital improvements.
- Scheduling of attendance of customer personnel to attend educational workshops, webinars, and group/individual training sessions with cohorts of facility managers (*e.g.*, Building operations training).

Customers can participate by application to the program or may be contacted directly by program personnel. Customers can participate individually or in a cohort with other customers in the same industry. The cohort would allow customers to share best practices amongst each other as each customer goes through the SEM program lifecycle. A customer would still be treated as an individual unique project within the cohort. The program will retrieve customer demographics and obtain customer agreement for the services to be provided and facilitate ongoing customer engagement. The utilities and/or a TPIC will develop application forms for this program that will guide applicants through eligibility guidelines, terms and conditions, and general program information requirements. In addition, the program will provide applications in web-ready formats to ensure participants and potential customers have easy access to the forms.

The utilities recognize that public entities have unique procurement requirements which could result in barriers to participation. The utilities will work with the State to develop and implement an approach that may offer a streamlined experience for these entities that meets their unique requirements.

Target Market or Segment (MFR II.a.ii)

C&I customers who are seeking comprehensive advisory, operational, technical and data analysis engagement-based energy solutions located within the utilities' service territories are eligible to participate in this program. The measures included in this program may include, but are not limited to, HVAC, building envelope, lighting, controls and other building systems, EE and energy consuming equipment.

Engineered Solutions, Tier 1 and 2 targets customers who need tailored EE support to help identify, develop, and undertake EE projects.

Regarding the Energy Management pathway, these strategies are generally appropriate for specific segments as described below:

- Building Operations and VCx measures target existing commercial buildings and may be particularly relevant for small- to medium-building types that utilize traditional building systems and controls.
- RCx and MBCx target existing commercial buildings and are particularly relevant for medium- to large-building types utilizing a building energy management system.
- SEM targets existing large to very large C&I customers and building types and is particularly relevant to customers with significant energy use who commit to on-going participation and engagement across the organization, including various levels of management and decision making.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

Incentives for the Engineered Solutions Tier 1 pathway will provide a 100% incentive for an up-front audit. The specific audit level will be determined on a project-by-project basis based on the complexity of the facility and potential EE measures. In addition, the utilities will buy-down the simple payback of the recommended EE project cost for approved measures by up to six years, with the resulting payback not less than three years. After the project incentive buy-down, the remaining project costs may be funded by the program with participants repaying the balance of the project costs through a repayment plan.

Engineered Solutions Tier 2: Incentives for the Engineered Solutions Tier 2 pathway will provide incentives for both technical assistance services and other project costs determined on a project-by-project basis using a cost effectiveness tool up to 60% of project cost.

In addition to the calculated project-by-project incentive, participants will have the option to pay back the non-incentive portion of the project costs through a repayment plan.

Tailored assistance support services may include design, construction administration, commissioning, M&V, and other technical support, which will be made available and included in the project cost on an as-needed basis.

Incentives for the Energy Management pathway are structured around the measure categories that focus on specific EE measures and management practices as follows:

- **HVAC Tune-Up**: Fixed incentives for the implementation of the tune-up measures based on the size of the HVAC units.
- **Building Tune-Up**: Incentives that cover up to 80% of the project cost and up to 70% of the cost to attend qualified BOC training up to $1,000 per person.
- **RCx**: Incentives to cover up to 100% of the initial cost to perform the required ASHRAE level audit. The total project incentive will be capped at up to 70% of the project cost. The customer may also be paid a custom incentive for the implementation of EE measures determined through the audit.
- **MBx, VCx**: Incentives to cover up to 100% of the cost of integration of third-party hardware and software. Utilities may also implement a performance-based model with an implementation contractor where the utility only pays for delivered and verified energy savings.
- **SEM**: The utility or TPIC may perform an engineering assessment of the customer's facility to develop a SEMP or the customer may choose to utilize a consultant of their choosing to perform an engineering assessment to develop the SEMP. Customers who utilize a consultant will receive an incentive to cover up to 100% of the initial cost of the engineering assessment. A tiered incentive structure for customer engineering assessment may be utilized based upon square footage of a customer's facility. The SEMP will identify short, medium, and long-term goals for the customer and will set identifiable metrics for mapping to the plan. For the implementation of EE measures determined by the SEMP, the customer will be paid an incentive that is commensurate with the applicable C&I Program offering that the measures are attributed.

Refer to Appendix H for the Summary of the Existing and Proposed Incentive Ranges for this program.

The utilities will strive to complete customer contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

Customer Repayment Options (MFR II.a.v)

Refer to Section 4h of this Program Plan for the Summary of Proposed Repayment for this program.

Contractor Requirements and Role (MFR II.a.vi)

The utilities will administer the Energy Solutions program and may also choose to select a third-party to manage delivery of this program. The utilities will oversee and coordinate on the program offering. The utilities may utilize qualified trade allies and/or contractors to undertake the services required to deliver this program. The utilities may also utilize qualified trade allies to assist in

outreach, marketing, and trade-ally coordination. Participants may contract with installation trade allies selected through a competitive solicitation process, or their own preferred contractors if allowed by the pathway, to provide program services.

The Engineered Solutions pathway delivery will typically occur in the following steps (the Engineered Solutions Tier 2 pathway may provide selected services, but not all, as determined on a project-by-project basis):

- **Audit**: The utilities shall assess the required level of an ASHRAE audit to perform based on the complexity of the facility and the potential EE measures; an investment grade audit may not be required for all facilities. The utilities will then select a program trade ally to perform the appropriate level energy audit and prepare a customized audit report that includes a list of recommended EE upgrades. The lead utility will then review the recommended EE upgrades with the customer to determine whether to proceed with a project.
- **Engineering Analysis of Project**: Based on the audit results and customer feedback, an engineering analysis may be required. The lead utility will conduct a screening of the payback and project cost effectiveness and recommend the selected EE measures for the project. The lead utility will review the project with the customer for customer agreement on the approved project and coordinate as necessary.
- **Engineering Design and Bid Package preparation**: The engineering trade ally hired by the lead utility will initiate the design of the selected EE measures for the approved project. In addition, this trade ally will also prepare a Scope of Work and bid package documents which the customer could use to put out a Request for Proposal to obtain installation cost estimates for the approved project.
- **Scope of Work/Contractor Bids**: The customer will issue a Scope of Work and bid package documents to obtain competitive bids to install selected EE measures for the approved project. The lead utility, the program engineering trade ally, and the customer will review and evaluate the bids/costs received, and the customer will make the final decision on bid selection. Following bid selection, the proposed project is again screened for cost effectiveness.
- **Measures Installation and Inspections**: The partnering utilities and the program engineering trade ally, acting as construction administration agent, will monitor project progress and will release project funds based on the following payment structure:
    - **Stage 1: Project Contracting Stage**: The first progress payment of up to 30% of the installation cost can be issued to the customer to initiate the project.
    - **Stage 2: Construction Stage**: A pre-defined series of monthly progress payments totaling up to 50% of total project commitment can be issued.
    - **Stage 3: Project Completion and Commissioning**: When the project is 100% complete, a final inspection and final project true-up will be performed; remaining progress payments will be issued.

The final payment based on the results of project true-up is determined and issued only if the final inspection is successfully completed and approved. If the final costs are less than the estimated project commitment, the final payment will be adjusted down to reflect the actual costs. If the final costs are greater than the estimated project commitment, the final payment will not be

adjusted and will be paid according to the executed agreements and contracts specifying original costs.

The progress payment schedule described above is designed to ensure that customers can pay their installation contractors on a timely basis. Project progress and the project cash flow will be monitored and verified by the lead utility and the trade ally engineering firm with updates to the partner utility as appropriate.

The utilities will select qualified program trade allies to undertake all services associated with the program. The utilities will also monitor participation to assess the effectiveness of outreach efforts, incentive levels, delivery methods, and program trade ally and installation contractor availability. The utilities will further provide suggestions for improvement. The installation contractor(s) will adhere to the project specifications recommended by the utilities and the program engineering trade ally and set forth between the installation contractor and the customer.

For Energy Management, the utilities will perform overall administration and oversight of the pathway and may also choose to select TPICs to manage delivery of this pathway. The utilities' staff and/or TPICs will oversee all aspects of the pathway. The utilities and/or TPICs will be responsible for administering, promoting, and providing the pathway to customers, including through staffing, processes ensuring quality, and other controls supporting successful program implementation. The utilities' staff and/or TPICs will conduct the marketing, management, and implementation aspects of this pathway.

The utilities' staff and/or TPICs will select qualified program trade allies and/or contractors to undertake all program services, as required. Installation and maintenance trade allies must adhere to the project specifications developed by the utility and/or TPICs. The utilities will leverage their existing and/or develop a network of engaged trade allies, including local construction, electrical, plumbing and other contractors, to educate them on program benefits and assist with building an approved trade ally network which will reliably maintain and install EE equipment for participating customers.

The utilities' staff and/or TPICs will also monitor participation to assess the effectiveness of outreach efforts, incentive levels, delivery methods, and program trade ally availability, and will further provide suggestions for improvement.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIx (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.ii.2 Prescriptive & Customer Program

Program Description (MFR II.a.i)

The Prescriptive and Custom Measures program will promote the installation of high-efficiency electric and/or natural gas equipment by the utilities' C&I customers, either via the installation of prescriptive or custom measures or projects. The program provides prescriptive-based incentives to C&I customers to purchase and install energy efficient products. The program will continue to support and/or provide downstream approaches to ensure the market is properly supported. The program may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. These measures will incentivize energy efficient lighting, appliances, heating and cooling equipment, and food service equipment, among other efficiency measures. Type and value of incentive provided will range and will include electric and/or natural gas technologies that improve EE. Up-front rebates will be offered to reduce initial costs and some purchases may qualify for a repayment plan to further reduce upfront costs. Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels.

Prescriptive rebates are designed to:

- Provide incentives to facility owners and operators for the installation of high efficiency equipment and controls;
- Promote the marketing of high efficiency measures by trade allies, such as electrical contractors, mechanical contractors, and their distributors to increase market demand; and
- Ensure the participation process is clear and simple.

Prescriptive incentives will increase adoption of energy efficient equipment by harnessing the utilities' unique customer relationships to positively impact the entire sales process surrounding efficient equipment. The process includes education and awareness with customers, engagement with trade ally contractors and equipment distributors, and repayment plan opportunities for high efficiency equipment.

The program also includes custom measures that provide calculated or performance-based incentives for electric and/or natural gas efficiency opportunities for C&I and other non-residential customers that are non-standard, variable, or not captured by prescriptive incentives. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient equipment to retrofit or upgrade specialized processes and applications and/or to implement qualifying high efficiency building shell or systems improvements. Typical custom measures that are eligible for incentives are either less common measures or efficiency opportunities in variable or specialized applications that may include manufacturing, industry-specific processes, or non-traditional use cases. In many cases, custom efficiency measures are more variable or complex than prescriptive equipment.

Potential participants may be required to submit an application for pre-approval to confirm measure or project eligibility and reserve funding. The utilities and/or implementation contractors

will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program requirements, terms and conditions, and general information. In addition, the utilities and/or implementation contractors will provide applications in web-ready formats to ensure participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports the utilities' program management because it communicates projects that are in the pipeline. If accepted and pre-approved by the utilities, a timeline is established for project completion to qualify for a rebate. The typical lead time for completing a custom project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects or subsets of projects may be required to undergo pre-and post-inspection to validate energy savings. Approved measures or projects may also be eligible for a repayment plan.

Target Market or Segment (MFR II.a.ii)

The Prescriptive and Custom Measures program will be available to all C&I and other non-residential customers located within the utilities' service territories. This program is focused on promoting the sale and installation of efficient electric and/or natural gas equipment across all major end-use categories and can be easily promoted to trade allies and customers via straightforward prescriptive rebates or more complex custom rebates. Potential technologies incentivized through prescriptive measures include energy efficient lighting, appliances, heating and cooling equipment, and food service equipment, among other efficiency measures. Customers pursuing custom incentives will generally be customers with more complex needs and non-standard or variable efficiency opportunities and typically include building types such as light/heavy industrial, manufacturing, data centers, and distribution centers, among others.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.A.iv)

The utilities propose to provide a range of incentives, depending on the measure type, subject to changes based upon customer response and economic and market conditions over the plan period. Incentives will vary depending on factors including but not limited to the specific product, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace.

Refer to Appendix H for the Summary of the Existing and Proposed Incentive Ranges for this program.

In instances where incentives are not immediate, the utilities will strive to complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

Customer Repayment Options (MFR II.a.v)

The participating customer will repay the balance not covered through the incentive either in a lump sum or through a repayment plan. Refer to Section 4h of this Program Plan for the Summary of Proposed Repayment for this program.

Contractor Requirements and Role(MFR II.a.vi)

The utilities may outsource some, or all, of the implementation of this program to an implementation contractor who would be responsible for defined functions, which could include administration, marketing, application processing, documentation regarding purchased products, and processing incentives and rebates. The utilities will perform overall administration and oversight of the program. To maximize customer participation and streamline the customer experience, the utilities will use their strong customer and marketplace relationships to support multiple implementation strategies to achieve program goals.

- **Trade Allies**: The utilities and/or the implementation contractor will target trade allies to promote EE opportunities and incentives to their clients. Preserving this downstream approach will ensure that customers and trade allies are properly supported. Trade allies will be able to leverage the program and offer customers rebates through their normal course of business. By developing relationships with trade allies, the program will develop a broad reach across the marketplace and solicit feedback to ensure incentives and measures are impacting the market as designed. Examples of targeted trade-ally firms may include:
    - Design, engineering, and controls firms;
    - Building energy managers;
    - HVAC distributors, contractors, and retail providers;
    - Food service retailers and service providers;
    - Commercial lighting retailers, distributors, and wholesalers; and
    - Electricians and Electrical contractors.

- **Retail**: The utilities' program staff and/or the implementation contractor field representatives may work with retailers and distributors that directly target C&I customers to inform them of the participation process and available equipment incentives. The utilities and/or implementation contractor may also provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. This may also include training and instruction to participating retailers and distributors about the utilities' application forms.

  The utilities may provide opportunities for commercial customers to purchase energy efficient equipment through an online marketplace.

- **Midstream**: The utilities and/or the implementation contractors may promote a midstream component for specific equipment types to encourage purchase of efficient equipment via directly marking down the cost of the efficient equipment at the point of sale. Midstream rebates encourage market transformation and wider availability of efficient equipment. The utilities anticipate offering midstream point of sale discounts across numerous equipment types, which may include, but not be limited to, LED lighting, HVAC, and food service equipment. Efficient products that are rebated via a midstream approach will not be eligible for incentives in any other utility EE program. The utilities and/or implementation contractor will also provide support and assistance to distributors to support identification and promotion of qualifying energy efficient products. This will also

include training and instruction to participating distributors, as well as enrollment of distributors to participate in midstream program offerings.

- **Digital**: The program will be marketed directly to C&I customers on the utilities' websites where customers will have easy access to information regarding eligible equipment and savings opportunities, how to participate, rebate applications, and incentives across all efficient equipment types and end-uses. The utility may also offer the direct purchase of eligible equipment through their website or an online marketplace.
- **Targeted Customer Outreach**: Utility staff may choose to reach out directly to large business and commercial customers to develop relationships with energy and facilities managers, operations staff, and procurement personnel. Program staff can help facilitate completion of rebate applications and serve as a direct resource to these customers, providing technical support and assistance in identifying efficiency opportunities.
- **Technical Customer Assistance**: An important element of the Prescriptive and Custom program is the availability of technical support. The utilities and/or implementation contractor will provide technical support to customers on the application of EE measures and technologies included in this program, including supporting measure or project identification, developing energy savings calculations, and assessing measure or project economics as required.

M&V for measures or projects that do not have reliable information to accurately forecast energy savings may require energy monitoring before and after measure or project implementation to determine savings and incentive amounts.

A comprehensive contractor agreement containing information about equipment certification (such as DLC lighting), licensing, and insurance requirements will be developed and provided to all participating contractors.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to qpis (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFRII.a.x)

Refer to Appendix B for information on these MFRs.

3a.ii.3 Direct Install Program

Program Description (MFR II.a.i)

The Direct Install Program is focused on providing the installation of efficiency measures for small- to medium-sized businesses, non-profit organizations, municipalities, schools, and faith-

based organizations ("eligible customers") that typically lack the time, knowledge, or financial resources necessary to investigate and pursue EE. The program is designed to provide eligible customers with easy investment decisions for the direct installation of multiple measures to comprehensive EE projects. The program will pay a percentage of the up-front cost to install the recommended EE measures, with the participating customer contributing the balance of the project not covered by the incentive. The program will also provide a repayment plan to the customer. The no-cost energy assessment mitigates the time constraints and knowledge barriers, while the reduced project costs and repayment options mitigate cost barriers and assist participants in making decisions, which otherwise would be time-consuming and potentially difficult to justify. The Direct Install program plays an important role in the marketplace because private providers of EE services typically do not target smaller customers due to the lower overall profit for their services when compared with larger non-residential customers. For these reasons, small to medium sized businesses, non-profit organizations, municipalities, schools, and faith-based organizations are often underserved, and the program fills an important gap by targeting, promoting, and delivering efficiency services to these customers directly.

The energy assessment will be provided to customers free of charge and will offer recommendations on EE measures to reduce the customer's energy usage and costs. Standard energy savings measures may also be provided or installed at no cost at the time of the energy assessment to support customer engagement, participation, and energy savings.

The program will also focus on the smaller customers within the eligible customer segments. The utilities anticipate portions of the program to be directed at restaurants, small offices, convenience stores, and other small independent businesses that often are left behind in EE programs. Through a number of delivery mechanisms, the utilities will ensure that all eligible business types are able to participate in this program.

The Utilities recognize that public entities have unique procurement requirements which could result in barriers to participation. The Utilities will work with the State to develop and implement an approach that may offer a streamlined experience for these entities that meets their unique requirements.

Target Market or Segment (MFR II.a.ii)

The utilities will seek to address the most cost-effective measures but will also address all measure retrofits that would comprise a cost-effective project. Examples of end-use categories covered by the program include lighting, HVAC, controls, refrigeration, food service, motors, low-flow devices, building envelope improvements, pipe wrap, and domestic hot water equipment. The program will be divided into three tiers of eligibility, determined by the customer's individual facility peak electrical demand over the last 12 months.

- Tier 1
    - Will serve the smallest of the eligible customer base: all customers with an average annual individual facility peak electrical demand of up to 100 kW and an average annual natural gas load of up to 5,000 therms.

- Tier 2

    - All customers with an average annual individual facility peak demand of up to 300 kW or average annual natural gas load of 40,000 therms that are located within an Urban Enterprise Zone ("UEZ"), Opportunity Zone, or ("OBC"); or

    - All customers with an average annual individual facility peak demand of up to 300 kW or an average annual natural gas load of 40,000 therms that are owned or operated by a local government, K-12 public schools, or 501(c)(3) non-profit.

- Tier 3

    - All customers with an average annual individual facility peak electrical demand of 101 - 300 kW or an average annual natural gas load of 5,001 therms to 40,000 therms.

The eligibility requirements listed above may be adjusted in coordination among the utilities to improve customer access, participation, and program performance based on economic and market conditions.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

Each tier of the program will encompass many of the same benefits, including a turnkey solution for eligible customers requiring no up-front investment. The initial site visit, energy assessment, and installation of recommended EE measures are provided at no initial cost to participants. The utilities propose to provide an incentive level of up to 80% of the project costs to promote the completion of comprehensive projects while maintaining overall program cost effectiveness.

For Tier 1 customers, the program will offer to pay up to 80% of the project cost to install the recommended EE measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through a repayment plan.

For Tier 2 customers, the program will offer to pay up to 80% of the project cost to install the recommended EE measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through a repayment plan. Customers located in an UEZ, Opportunity Zone, OBC, or other geographic area designated by the Board may also qualify, as will local governments, K-12 public schools, or non-profits categorized as 501(c)(3) or 501(c)(19).

Tier 3 will serve the larger segment of eligible customers, with an individual facility average annual peak electrical demand of 101 – 300 kW or 5,001 – 40,000 therms over the past 12 months. Incentives up to 70% of the total project cost will be offered with the participating customer repaying the balance not covered through the incentive either in a lump sum or through a repayment plan.

Utilities may impose a dollar cap on the incentives for all tiers.

Refer to Appendix H for the Summary of Existing and Proposed Incentives for this program.

Customer Repayment Options (MFR II.a.v)

The participating customer will repay the balance not covered through the incentive either in a lump sum or through a repayment plan.

Refer to Section 4h of this Program Plan for the Summary of Proposed Repayment for this program.

Contractor Requirements and Role (MFR II.a.vi)

The Direct Install Program interfaces with customers via either direct solicitation or upon customer request. All participants receive a site visit, including a free on-site energy assessment to identify EE retrofit opportunities. Standard energy savings measures may also be installed at no cost at the time of the energy assessment for eligible Tier 1 customers, to support customer engagement, participation, and energy savings. Following the energy assessment, participants are provided with a report assessing the site and recommending additional measures that could further improve the EE of the facility.

Based on the results of the energy assessment report, the program will offer to pay a percentage of the project cost to install the recommended EE measures. The program may also provide a repayment plan to the customer (and/or landlord) for their portion of the project cost. Utility staff and/or TPICs will provide turnkey solutions to eligible customers with the initial site visit, energy assessment and installation of recommended efficiency measures at no initial cost to participants. The utility will ensure this is completed on time and to specifications. This approach frees up the participant, who may not have the time or resources to dedicate to project identification, development, and implementation. The distinction between Tier 1, 2, and 3 eligibility criteria will ensure that eligible customers, even those that are the smallest and often overlooked, receive ample focus.

The participating contractors will perform the energy assessments and installations, working with the utilities and/or the implementation contractors oversight to undertake all construction and installation work identified in the energy assessment process.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3a.iii Multifamily Sector

The core Multifamily sector program is described below and includes:

- Multifamily

3a.iii.1 Multifamily Program

Program Description (MFR II.a.i)

This program addresses multifamily structures with three or more units. As such, there can be significant variation in the types of structures served under this program ranging from residential type dwellings with three units to large garden apartment complexes to multi-story high rise buildings. To meet the specific needs of each customer, the Multifamily Program will provide, in conjunction with the customer, a structured screening review to identify and develop the project plan for the customer. Potential program services include customer engagement with EE education through energy assessments and a suite of efficiency and BD offerings ranging from simple to deep energy retrofits targeting all end uses. In addition, the Multifamily Program may provide OBR or access to financing with similar terms and enhanced incentives for income-qualified customers and affordable housing properties.

The Multifamily Program will seek to work with each customer to determine and package the best energy savings opportunities based on the needs and interests of the customer, with an emphasis on encouraging more comprehensive projects wherever possible. Customers will begin participation in the Multifamily Program with a screening to identify and develop a project plan. The initial screening may include an energy assessment and installation of standard energy savings measures where possible to help encourage program participation. The assessment will also identify additional energy savings opportunities and develop the project plan that is the best fit for each specific customer and building.

Applications to this program will be reviewed to determine the project plan depending on the type of housing stock and ownership structure. The screening process will consider various factors to create a project plan that will deliver a high level of energy savings in a cost-effective manner. Examples of these factors include, but are not limited to:

- Building size;
- Number of units;
- If the facility is being served by a central plant;
- If there are individual heating and cooling units;
- If there are building envelope/weatherization opportunities;
- Application review with a potential virtual site inspection or telephone interview with property management; and
- An on-site pre-scoping audit may be performed.

Depending upon the screening results and the customer's interests, a customer's project plan could include direct installation of standard and comprehensive energy saving measures, comprehensive building wide efficiency, and other possible measures. The measures within the project plan may align with the terms and conditions of the utilities' respective applicable residential and/or C&I

program offerings, where appropriate, and may include multifamily-specific terms, conditions, incentives, and offerings. Therefore, the project plan can include prescriptive measures with set energy-savings and/or custom projects with savings on a project basis. The incentives for the measures may not match the incentives in other programs, as the multifamily sector has higher barriers to overcome. Discussions with customers may also target the identification of specific opportunities that may align with other utility programs, including measures provided in Additional Utility-Led Initiatives.

Target Market or Segment (MFR II.a.ii)

All multifamily buildings with three or more units that are served by at least one investor-owned utility are eligible to participate. The program targets multifamily property owners, property managers, and residents, who, because of the building owner – tenant relationship, have always had difficulty investing in EE equipment. The utilities will also target outreach to income-qualified occupants and owners of multifamily buildings who are eligible for enhanced incentives.

Eligibility for these enhanced incentives can be automatic based upon the type of property that can be identified as serving income-qualified customers, such as those with an affordable housing designation (*e.g.*, New Jersey Housing and Mortgage Financing Agency qualified, Housing Authorities) or identifiable by a physical location (*e.g.*, census tract, OBC with a low-income characteristic). The utilities reserve the right to align with categorical eligibility of federal and state EE programs for income eligibility. The program may refer prospective customers to income-qualified program(s) as appropriate.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.A.iv)

The measures of the Multifamily Program are a comprehensive combination of potential program components. Depending on the needs of the customer, different program components may be provided to them. Incentives for some measures may align with the existing incentive offerings for other program offerings, however, the program has the flexibility to offer different incentive levels.

See Appendix G for existing and proposed incentive ranges for each of the potential program components that utilities may offer as part of their Multifamily program.

Refer to Appendix H for existing and proposed incentive ranges for each of the potential program components that utilities may offer as part of their Multifamily program.

Customer Financing Options (MFR II.a.v)

Refer to Section 4h of this Program Plan for the Summary of Proposed Financing.

The Multifamily Program may provide OBR or access to financing with similar terms and enhanced incentives for income-qualified customers and affordable housing properties.

Contractor Requirements and Role (MFR II.a.vi)

The Multifamily Program will be delivered in coordination between both the Lead Utility and the Partner Utility (where applicable) and/or qualified TPIC(s) with experience delivering similar

programs. Because of the unique and varied nature of the multifamily market, program representatives will build relationships with property management companies, owners, associations, and their members to recruit participants into the program. The program will assist customers as necessary to coordinate scheduling of the Energy Assessment and direct installations and will provide program and technical support to complete program and rebate application requirements.

Delivery of energy-saving measures will be dependent on the project plan and may include direct installation of standard and comprehensive energy savings measures, installation of prescriptive measures, and/or custom projects. It may be necessary to schedule appointments for the installation of energy saving measures in individual living units and common areas. In-unit HVAC tune-ups may also be offered to the property owner or tenant. The installation crews are trained on the technical and educational aspects of the measures installed and leave educational materials in each unit describing the work performed and explaining the energy-saving benefits.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to qpis (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3b. Additional Utility-Led Initiatives

As discussed in the Introduction, Additional Utility-Led Initiatives follow a consistent format but contain utility specific proposals, with the exception of Next Generation Savings, which provides consistent information across the Utilities.

The Additional Utility-Led Initiatives are described below and include:

- Next Generation Savings
- Building Decarbonization
- Demand Response
- Conservation Voltage Reduction Program

JCP&L proposes Additional Company Initiatives to provide a comprehensive portfolio of offerings to customers and greater opportunities for participation. Such initiatives help to establish a framework to meet the aggressive and increasing annual energy savings targets. Such initiatives

further support the Company's implementation of programs to establish and develop systems and processes, program and trade ally participation, customer awareness, and experience and momentum for the future. Such initiatives are based on successful programs in other jurisdictions and collaboration with other NJ utilities to promote coordinated program design and delivery.

3b.i Next Generation Savings Program

Program Description (MFR II.a.i)

The Next Generation Savings ("NGS") Program will develop critical insights that can help the State with longer term strategies for reaching its clean energy and climate related goals. This program is a key step to gain technical and market understanding on installation, performance, economic, and other considerations for new customer EE solutions. NGS will support new technologies and approaches that, while ready for broader adoption, need enhanced contractor training, customer incentives, or other key elements to help the marketplace understand the value proposition and implement the measure. It is critical to establish a program like this to ensure utilities and the State will be in a better position to achieve escalating energy savings targets and get new resources to market in a timely fashion.

Since NGS will be focused on technologies and approaches that have proven potential, this companion effort will focus on the extra support needed to get those proven technologies and approaches into the marketplace to help New Jersey reach its clean energy and climate-related goals, introduce new solutions for customers, and support the development of a clean energy economy. Individual utility interest in supporting particular technologies and approaches may vary due to their fuel source, service territory demographics, or other unique characteristics. Therefore, NGS would be an optional Additional Utility Led Initiative but would be conducted in a collaborative manner to ensure insights are shared across utilities and with the State and other stakeholders. Progress updates will be shared periodically with the Utility Working Group and publicly through the EE Stakeholder meetings to ensure all stakeholders can benefit from the knowledge developed by this program.

The primary objectives of NGS include:

- Identifying promising technologies or approaches that are ready to be integrated into EE offerings for New Jersey, including proposing savings calculations for the Technical Resource Manual and elements to be included in Evaluation, Measurement and Verification plans;
- Identifying and engaging market actors and customers interested in being early adopters of new technologies or approaches;
- Providing support, including training and potential incentives, to program and/or trade allies willing to start promoting the technology and approaches;
- Supporting the successful deployment of new technologies or approaches through case studies, marketing materials, training events, recruitment, and other activities;
- Identifying and addressing other potential market barriers; and
- Providing results and knowledge to Utility Working Group and stakeholders.

Due to the supporting role they will play in EE efforts, the individual technologies and approaches tested will vary from year to year, with the goal of supporting continuous innovation and increasing energy savings. NGS supported technologies or approaches are expected to eventually be layered into existing approved EE programs without the need for supplemental NGS program support.

NGS activities may include:

- Implementing outreach to program and/or trade allies, such as but not limited to, through dedicated workshops on the technologies or approaches, including installation instructions, requirements and operations and maintenance procedures; participation in industry conferences related to these technologies; close work with trade ally associations;
- Developing curriculum and training courses for use in technical schools or higher education and coordinating with other utility Workforce Development initiatives as applicable. However, it is important to note that training would be targeted to enhance the skill set of the existing workforce with specific new technologies or approaches;
- Providing incentives for program and/or trade allies that may need special software, diagnostics tools, or other materials to support the purchase, installation, and/or maintenance of these new technologies or approaches;
- Conducting market research, including surveys, focus groups, interviews, and due diligence reviews, to understand the attractiveness, costs, and suitability of the new technology or service for customers, program, trade allies, and other New Jersey stakeholders;
- Conducting pilots where the technologies or service delivery innovations are offered to select groups of customers to measure performance on a wider scale, in preparation for a full offering in other EE programs;
- Offering attractive incentives for customers and/or trade allies who are early adopters;
- Educating market actors and other stakeholders by conducting on-line or in-person training events, and preparing marketing materials such as case studies, brochures, and frequently-asked-question documents;
- Initiating other efforts to increase market acceptance of proven technologies and approaches;
- Providing incentives based on expected energy savings or project cost, similar to custom calculated measures;
- Direct funding to a manufacturer, distributor, contractor, retailer, or host site to offset technology equipment or installation cost; and
- In-kind support, such as use of monitoring equipment, technical, or administrative support for data collection and analysis, report preparation, and promotion, etc.

Due to the intensive level of support contemplated for initiating broader market adoption and uncertainty regarding market participation, it is not feasible to accurately estimate the costs and benefits at this time. Accordingly, NGS should be exempt from the requirements set forth in MFR Part V. As technologies and approaches are ready to graduate from the NGS, they will be subject to a review of their costs and benefits prior to adoption with traditional EE programs.

When a technology or approach is ready to "graduate" from the NGS program, participating utilities will complete a summary of the efforts conducted under this program, which may include the following, as appropriate:

- Participation and performance metrics;
- Customer and program and/or trade-ally feedback;
- Identification of market barriers or unforeseen challenges with proposed remedies;
- Training metrics—participation and feedback and identification of on-going training needs;
- Updates on customer, program, and/or trade-ally recruitment; and
- Marketing and outreach plan.

Target Market or Segment/Efficiency Targeted (MFR II.a.ii)

The program will support new technologies and approaches that are ready for broader adoption but need enhanced training, customer incentives, or other key elements to help the marketplace understand the value proposition and implement the measure. These new technologies may be targeted to the residential, multifamily, or C&I sectors.

Participating utilities will include periodic updates on NGS program activities as part of Utility Working Group and EE Stakeholder Meetings. Potential examples within NGS include:

- Advanced duct sealing technology;
- Air-to-Water Heat Pump systems;
- Heat pumps for industrial applications;
- Thermal imaging mapping; and
- Natural gas heat pumps.

Technologies under NGS do not necessarily require further testing to prove their technical energy savings potential, but they do need considerable work to identify and address barriers to adoption in the marketplace. NGS will enhance stakeholder understanding of these barriers to market deployment and to develop strategies including training to address them.

Delivery Method

Participating utilities will utilize staff and/or third-party vendors to support technologies or approaches under this program, follow industry trends and research, assist in securing customers and program and/or trade allies interested in exploring new technologies or approaches, and support coordination efforts.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.A.iv)

Incentives may be developed for customers who are early adopters or may be provided at a mid-stream or upstream level. Supply chain incentives for manufacturers or distributors may be an important strategy for some technologies.

Incentives are also anticipated to help support program and/or trade ally commitment to the technologies and approaches within this program.

Program and/or trade allies and customers who are the beneficiaries of incentives under this program will be required to share energy and pricing data, complete required surveys, and support independent evaluation efforts.

Customer Financing Options (MFR II.a.v)

The program may include a financing component to support the growth of developing technologies and commercialization of new energy saving technologies.

Contractor Requirements and Role (MFR II.a.vi)

Contractors and other program and/or trades allies interested in expanding their knowledge and broadening the range of solutions they can offer customers will benefit from this program. They will have the opportunity for training, potential funding for software, diagnostic tools or other materials, potential special incentives to offer program vendors and/or trade allies and customers who are early adopters, supporting marketing materials and other resources to help address market barriers.

Marketing Approach

NGS will begin to develop and implement customer outreach approaches, but this may not take on a traditional marketing approach. As a result, the program may provide targeted marketing efforts for customers and niche markets identified through NGS. Such efforts may include:

- Working with identified program and/or trade allies to develop relevant collateral;
- Collaborating with technical and marketing staff to develop and syndicate white papers;
- Developing tailored proposal and presentation kits;
- Analyze and remarking to leads from other utility programs;
- Engaging business and trade organizations;
- Identifying potential customer demographics for targeted outreach campaigns; and
- Working with utility outreach staff/liaisons to identify existing customers with needs that can be addressed by the featured technologies or approaches.

Market Barriers

In addition to the market barriers identified in the utility marketing plans, this program would overcome several additional market barriers and lead to increased uptake of new technologies and approaches:

- **Program and Trade Allies Not Trained on Installation and Operations and Maintenance**: Many contractors and program and/or other trade allies may not be familiar with emerging technologies or new approaches and have limited resources to participate in industry courses. Lack of knowledge limits the range of solutions they can offer to customers and may also lead to the potential to dissuade a customer from trying new technologies or approaches. NGS will address this barrier through extensive training

offerings, outreach to industry associations, funding for certain software, equipment or tools, and supporting customer materials.

- **Integration with state and local building codes**: New technologies can often be introduced to the market before code officials have considered how to review the proper installation practices and/or been given accurate guidance. NGS intends to address this barrier through coordination with the N.J. Department of Community Affairs and outreach to local code officials where applicable.
- **Supply Chain Challenges**: Emerging technologies are often unavailable due to retailer/distributor failure to stock and service the new products. NGS will raise awareness and engage the New Jersey marketplace with information and case studies about the new technologies that are proven, by deployment test studies, to be high value additions to EE programs. NGS will invest resources to familiarize program and/or trade ally partners of all types with the advantages of embracing and promoting new technologies to customers and may consider supply chain incentives.
- **Customer Acceptance of New Technologies or Approaches**: Due to the unique nature of these technologies or approaches, and because the utilities will likely not market to a broad base of customers, the utilities do not anticipate traditional marketing channels or campaigns. Potential customers will consist of knowledgeable buyers (often teams) who will analyze products in terms of user benefits. Participating utilities will develop specific customized materials for deployed technologies or approaches including:
    - Technical specifications;
    - Benefits;
    - Best practices; and
    - Industry case studies.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide customers with access to their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to gpis (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.IX) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

3b.ii Building Decarbonization

Program Description (MFR II.a.i)

Reducing GHG emissions from the building sector is one of the seven key strategies identified in the EMP. In addition to energy and demand savings, beneficial electrification initiatives provide

significant GHG emissions reductions. The Company's BD Program has been designed to encourage customers who currently use fossil fueled equipment to adopt more efficient electric equipment. Program eligible measures target common building stock applications and equipment to support the objective of achieving net source program energy savings on a fuel-neutral MMBtu basis. This program offers incentives for electrification measures to residential, C&I, and multifamily customers, and has been designed to enable participation by LMI customers who may not be eligible to participate in the Comfort Partners Program. These BD incentives and initiatives are designed to align with incentives for EE measures available through other EE programs and include measures that support BD, such as weatherization and make ready work (*e.g.,* wiring upgrades).

Residential customer offerings are included in two components: Electrification Direct Install and Electrification Rebates. Measures within both components include induction cooktops, heat pumps, heat pump water heaters, and make ready work (*e.g.*, wiring upgrades).

C&I customer offerings are included in two components: Electrification Direct Install and Electrification Rebates. Measures within both components include heat pumps, heat pump water heaters, and make ready work (*e.g.*, wiring upgrades).

Multifamily customer offerings are included in two components: Electrification Direct Install and Electrification Rebates. Measures within both components include induction cooktops, heat pumps, heat pump water heaters, and make ready work (*e.g.*, wiring upgrades).

JCP&L has included an additional measure in all sectors that allows additional electrification measures to be added as a result of their adoption by the NJ EMV team or TRM or through coordination with other NJ utilities, subject to having available program budgets.

Target Market or Segment (MFR II.a.ii)

The target market for this program will be residential, C&I, and multifamily customers who use fossil fuel for building end uses, including but not limited to heating, water heating, and cooking equipment, who can switch to electric appliances and equipment.

The utilities may offer enhanced incentives for LMI customers (up to 400% of federal poverty level) for certain products to assure that the program reaches all customer types. Eligibility for these enhanced incentives can be determined based on screening an individual customer; however, the utilities will also explore implementing automatic eligibility for enhanced incentives based upon physical location (*e.g.*, census tract, environmental justice community, UEZ) to encourage more activity in LMI communities.

The general marketing plan for this program aligns with the discussion outlined in Section 4d. Additional marketing considerations for the BD Program will include the development of educational and outreach materials for program and trade allies to help identify, focus, and promote electrification for good candidates as well as all eligible customers. As the decarbonization benefits of the program are different than typical EE projects, marketing will include specific communications to highlight those and other benefits to customers.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

The Company plans to offer enhanced incentives for LMI customers to assure that the program reaches all customer types, similar in nature to enhanced incentives offered for LMI participation in other EE&C programs.

In addition to the incentives provided for this program, the IRA also provides funding for electrification projects. Many of the rebates and tax credits for electrification technologies specified in the legislation align with the technologies included in this program, such as heat pumps, heat pump water heaters, and electrical upgrades. The Company will work to help customers take advantage of these opportunities, and the combination of the IRA rebates and tax credits and incentives available through this program will further entice customers to pursue projects that require significant investment. As more details emerge about how the IRA will be implemented in New Jersey, the Company will work to educate customers about both the IRA opportunities and funds available through this program to further promote participation in electrification projects.

Refer to Appendix H for the incentives for this program component.

Customer Financing Options (MFR II.a.v)

Refer to Section 4h of this Program Plan for the Summary of Proposed Financing for this program.

Contractor Requirements and Role (MFR II.a.vi)

JCP&L will perform overall administration and oversight of the program and may also choose to select additional TPICs to manage delivery of this program. Customers in the residential, multifamily, and C&I sectors will be offered the opportunity to participate in BD programs (with incentives, direct installation, and/or financing), driving carbon reductions as well as energy efficiencies at the source across fuels. Customers will be educated about savings benefits to understand bill impacts and will also be informed about contributions to emissions reductions. This strategy will leverage other EE programs and make effective use of resources. As electrification projects are new, the Company and implementation contractors will remain flexible relative to staffing and effective communication strategies with customers and allies (*e.g.*, electrical, HVAC, and plumbing contractors) to support awareness of program opportunities, "make ready" measures, and support proper and safe installation practices. Data collection, reporting, and evaluation will also include new data and metrics (*i.e.*, source MMBTu and emissions reductions).

Company staff and/or TPICs will oversee all aspects of program delivery, including marketing, and implementation. Marketing will target specific customer sectors, program allies, and partners to ensure awareness in the program and enhance customer participation. Additional target marketing will be completed to enhance participation among hard-to-reach customers. Qualified Company and TPIC staffing will establish and implement processes to ensure successful program results.

The Company and/or TPICs will select qualified program trade ally contractors to undertake all

program services. Installation and maintenance trade allies must adhere to the project specifications developed by the Company and/or TPICs. By educating and training trade allies on program benefits and participation processes and requirements, the Company will look to grow its existing approved trade ally network, including local construction, electrical, plumbing, and other contractors. The trade ally network will be leveraged to reliably maintain and or install EE equipment for participating customers.

The Company and/or TPICs will also monitor participation to assess the effectiveness of outreach efforts, incentive levels, delivery methods, and program trade ally availability, and will also provide suggestions for improvement.

Selection of TPICs and program trade allies will prioritize criteria including but not limited to:

- Experience delivering similar subprograms or initiatives;
- Knowledge of the current marketplace;
- Resources and marketing strength;
- Local presence;
- Cost; and
- The amount of business placed with minority, women, veteran, and service-disabled veteran owned businesses.

The Company plans to issue a request for proposal for TPICs who will be responsible for marketing, customer enrollment, program and trade ally engagement, application and rebate processing, documentation, and other program delivery activities discussed above. The Company plans to select the TPIC(s) in a timeframe that supports timely program implementation upon Board approval of the program.

Customer Access to Current and Historic Energy Usage Data (MFR II b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, by year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

Benefit Cost Analysis Requirements (ATTACHMENT B MFR V)

JCP&L recognizes that electrification measures are new in this planning period and are untested in New Jersey for many variables, including cost effectiveness. Although they are not required to be cost-effective in the planning stage, in the reporting process, the Company will calculate and track the benefit-to-cost ratios as directed in Orders, with the goal of designing future programs that achieve NJCT ratios greater than 1.0. The Company will monitor the performance of the

program and coordinate with the other New Jersey utilities throughout implementation of the program for continuing program performance improvements with specific regard to opportunities, participation rates, barriers, and cost-effectiveness.

Additional Metrics Related to Electrification (ATTACHMENT B MFR VII)

See Appendix G for metrics related to electrification.

As electrification measures are new, JCP&L will use existing protocols and/or work with its Evaluation Consultant and the NJ EM&V Working Group to support development and enhancement of new protocols for evaluation of beneficial electrification measures for overall annual and lifetime fuel energy savings.

3b.iii Load Optimization & Peak Demand Response

Program Description (Attachment C MFR 2.a.i.1.)

The Load Optimization & PDR program is an expansion of JCP&L's existing Home Optimization & PDR program to target additional customers, including small business customers, and potentially additional connected devices. In addition, the Company is adding a BDR option for residential customers. The curtailment objectives of this program are to reduce demand during peak load events to achieve the benefits of peak demand reduction in alignment with the Board's "DR Guiding Principles" as outlined in Attachment C to the July 26 Order. Peak load events (or "turn-down" events) will be called for days and periods during which the PJM day ahead forecast indicates potential peak loads.

To date, the Company has successfully implemented the Home Optimization and PDR program through use of bring your own device smart thermostats as the primary control device in the home. The Load Optimization & PDR program is anticipated to evolve to potentially include other connected devices in homes and businesses, such as but not limited to water heaters, electric vehicles/chargers, and battery storage systems.

Participating customers with program eligible connected devices will agree that a Load Control implementation contractor selected by the Company will be permitted to control, cycle, and/or optimize the use of select customer equipment through a program eligible connected device. The program includes customers' smart thermostats for control of air conditioning, and potentially electric vehicle charging or other customer equipment to optimize the use of and reduce load of connected devices during peak demand periods. The program will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance, nor if customers choose to exit the program at any time.

A BDR component will be added to this program where customers will be selected and targeted to reduce load on peak load days. Notification messages will be sent to motivate participating customers with smart meters installed to reduce usage during peak load days. Customers will be provided notice via email or telephone up to 24 hours in advance prior to peak days to support load

reductions during peak hours. This component will also provide post-event feedback to customers about their usage performance during the event, with normative comparisons to other customers, and recommendations to reinforce their usage reduction behaviors in future events. The Company will contract with TPICs who will directly administer and manage delivery of the program and provide program services. The implementation contractor for the BDR will be required to select the participating customers (treatment group), develop and provide notification messages to customers with smart meters to promote their participation, analyze customer usage during the event, and provide post-event feedback. Customers will be able to opt-out of the program at any time.

Portability and Demand Response Guiding Principles (Attachment C MFR 2.a.i.1.b,c e.i, and e.ii))

BDR customers may opt out of this program component at any time by contacting the program via phone or email. Load Control customers may override their participation in any load control event and may also discontinue program participation at any time, such as to participate with a third-party provider, by contacting the program via phone or email. This program does not include Distributed Energy Resource Management Systems ("DERMS") deployment.

The program design aligns with the Board's DR Guiding Principles by leveraging program implementation contractors, supporting "bring your own" customer connected devices rather than proprietary program equipment, enabling participants to discontinue participation in the program, such as to participate with a third-party provider, and potentially adding other types of customer connected devices.

Customer Access to Current and Historic Energy Usage Data (Attachment C MFR 2.a.i.1.d)

Refer to Section 4c for a description of how each utility will provide for customers to access their energy data.

Stakeholder Engagement (Attachment C MFR 2.a.i.1.e.iii)

The Load Control component of the Load Optimization & PDR program was approved in the current plan, and Behavioral DR is among the successful strategies cited in the Board's DR Framework. The Load Control program is designed with the potential to expand to equipment beyond air conditioning through smart thermostats. The Behavioral DR program was communicated in the Joint Utility Pre-Filing meeting on August 29, 2023, and the Company's Pre-Filing meeting on September 14, 2023. JCP&L is including Behavioral DR and Load Control, based on the successful implementation of these program components by the Company or its affiliates in other jurisdictions.

Target Market or Segment (Attachment C MFR 2.a.i.2)

The target market for the Load Control component of the Load Optimization & PDR program is residential and small business customers, including LMI and multifamily customers, with eligible connected devices, like smart thermostats. The target market for the Behavioral DR component of the program is residential customers, including LMI and multifamily, with AMI.

Existing and Proposed Incentive Ranges (Attachment C MFR 2.a.i.3 and MFR 2.a.i.6)

Customers participating in the Load Control component of this program with certain technologies (*e.g.*, program eligible smart thermostats) will receive an initial enrollment incentive after enrollment, and an annual participation incentive after each performance year. Other technologies may receive a performance incentive based on actual performance during load control events. The BDR component of this program does not initially include a customer enrollment or participation incentive. Refer to Appendix H for the Summary of the Existing and Proposed Incentive Ranges.

Demand Response Measurement Methodology (Attachment C MFR 2.a.i.4)

The Load Control component of the Load Optimization & PDR Program will utilize AMI and/or smart thermostat data analytics to evaluate actual load reductions during peak load events. For BDR, as with other behavior programs, eligible participating customers and control groups will be randomly selected to support performance evaluation. Hourly AMI data of the BDR participants and control groups will be evaluated to support normative comparisons and calculation of load reductions. Load Control measurement methodologies will reflect industry practice and available AMI data supporting actual load reduction impact assessments.

Demand Response Rebound Effects (Attachment C MFR 2.a.i.5)

BDR and Load Control event performance reviews will include assessment of any rebound effects. Post-event feedback to BDR customers about their usage performance can include recommendations reinforcing any rebound behaviors in future events. Similarly, assessment of rebound effects can be used to inform load control strategies to minimize such effects in future events.

Avoid Demand Response Double Counting (Attachment C MFR 2.a.i.7)

BDR participants and control group customers will be selected to exclude participants in the Load Control component of the Load Optimization & PDR program. Should such customers elect to participate in that program component, they will be removed from future BDR participation to avoid double counting. Additionally, smart thermostats incented by other programs in the Company's Plan have a peak demand savings measure assumption of zero, which also precludes the potential for double counting.

Qualified Equipment, Incentives, and Communications Standards (Attachment C MFR 2.a.i.8)

For BDR, no equipment is required, and no monetary incentives are provided for participation. For Load Control, eligible customers must have internet-connected and accessible control devices (*e.g.*, smart thermostats) where the device manufacturer and customer support control access to the program. The program does not involve proprietary communications standards. Refer to Appendix H for the incentives for this program component.

Capital Investments such as IT Hardware and Infrastructure (Attachment C MFR 2.a.ii)

No capital investments are required since the program leverages program implementation contractors and customer owned connected devices.

Customer Financing Options (Attachment C MFR 2.a.iii)

There are no financing options for this program since there is no up-front cost to customers.

Contractor Requirements and Role (Attachment C MFR 2.a.iv)

JCP&L will outsource the implementation of the Load Optimization & PDR program to one or more TPICs who will be responsible for marketing, outreach, enrollment, education, and fulfillment aspects of program.

The contractor will develop an implementation plan to expand the program to business customers and to potentially include additional eligible devices.

Projected Participants (Attachment C MFR 2.a.v) and Demand Reductions relative to QPIs (Attachment C MFR 2.a.i.1.a)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (Attachment C MFR 2.a.vii) and projected program costs, by year, broken down into the specified categories (Attachment C MFR 2.a.ix)

Refer to Appendix B for information on these MFRs.

Additional Information Applicable to DR Programs Integrated with Renewable Energy Projects, (Attachment C MFR 2.a and b)

Not Applicable

Reporting Plan for DR Performance Metrics, (Attachment C MFR 6.a and b)

See Appendix G for target values of the listed DR program performance metrics. Company reports will describe program progress and actual performance metrics over the period of the plan.

3b.iv Conservation Voltage Reduction Program

Program Description (MFR II.a.i)

Under the CVR Program, JCP&L will perform engineering analysis to identify opportunities for energy and demand savings through downward adjustments to voltage settings at substations and distribution circuits across its service territory. The Company will implement, monitor, and maintain the reduction of voltage at selected substations and distribution circuits. Results (*e.g.*, voltage levels and energy and demand savings) will be reviewed throughout implementation.

The CVR Program incorporates voltage regulation techniques at select substations and distribution circuits that result in lower service voltage levels (within regulatory voltage limits), thus causing a reduction in customer energy consumption and demand. The voltage set points for select Company distribution substations with automatic voltage controls and load tap changers, and potentially other distribution equipment, will be assessed and recalibrated to deliver a lower voltage. The adjustment of the voltage settings will be made only on distribution circuits that have been analyzed and can operate within all regulatory voltage requirements during peak loading conditions with limited to no upgrades. The program will be implemented at the selected substations and distribution circuits by Company employees who will perform the voltage set point changes.

Annually, the Company will monitor the substations and circuits where CVR has been implemented to review, confirm, and readjust the equipment settings to the lower voltage settings. The monitoring will also include confirmation that voltages are within voltage requirements. Additionally, the Company will assess new or upgraded non-CVR circuits to consider them for engineering review to identify and implement CVR on additional circuits with limited to no upgrades.

Target Market or Segment (MFR II.a.ii)

The target market for this program are JCP&L distribution substations and circuits where voltages can be reduced while operating with all voltage requirements under peak load conditions.

Existing and Proposed Incentive Ranges (MFR II.a.iii) (MFR II.a.iv)

Not applicable; the program does not involve any customer incentives.

Customer Financing Options (MFR II.a.v)

Not applicable; the program does not involve any customer investment.

Contractor Requirements and Role (MFR II.a.vi)

No contractors are anticipated for implementation of the CVR program. JCP&L will engage its EM&V contractor, in consultation with the statewide evaluator, to evaluate, measure, and verify energy savings and peak load reductions resulting from the program. Refer to Section 4e for more information regarding EM&V.

Customer Access to Current and Historic Energy Usage Data (MFR II.b.iii)

Refer to Section 4c of this Program Plan for a description of how each utility will provide for customers to access their energy data.

Projected Participants (MFR II.a.vii) and Energy Savings relative to QPIs (MFR II.a.viii)

Refer to Appendix A for information on these MFRs.

Program Budget, By Year, (MFR II a.ix) and projected program costs, by year, broken down into the specified categories (MFR II.a.x)

Refer to Appendix B for information on these MFRs.

4.0 PORTFOLIO INFORMATION

As discussed above, some information contained in the Portfolio Information section (Section 4) is consistent, while the remaining subsections are utility specific. The following subsections contain consistent information across all of the utilities:

- 4e: Evaluation, Measurement and Verification (MFR VI.)
- 4f: Reporting Plan (MFR VIII.)
- 4g: Overburdened Community Standardization

Sections 4a-4d and Section 4h each present information specific to each utility. If provided, additional sections within Section 4 are utility specific.

4a. Quality Control and Customer Complaint Resolution (MFR II.b.i)

Program Quality Assurance and Quality Control

JCP&L plans to contract with experienced and qualified TPICs to support the successful implementation of the programs. During the selection process, the Company will prioritize, among other criteria, the vendor's demonstrated experience in delivering similar programs or initiatives, further supporting program quality to customers. The Company will deploy routine quality assurance and quality control measures to ensure its internal and vendor processes are meeting the goals, requirements, and objectives of the programs.

Throughout implementation of the programs, the Company will perform program oversight, supported by evaluation activities (*e.g.*, surveys, inspections, reviews, and process evaluations) to monitor program delivery, ensure customer access to programs, and verify quality standards are met. Additionally, any trade ally or contractor will undergo a thorough onboarding review to ensure appropriate licensure, insurance, and comprehension of program requirements prior to performing any work on behalf of the Company and programs. The Company will take corrective

actions for any trade ally or contractor deficiencies identified while overseeing programs, including for non-compliance with program requirements, objectives, or Company standards.

Complaint Resolution

All program inquiries and complaints will be initially fielded by the program TPIC for their review and resolution. Additionally, the TPICs are obligated to report customer inquiries and complaints to the Company, including details of the inquiry or complaint, its status, and the resolution. The TPIC and Company will make every effort to satisfactorily resolve any complaints at the outset. Should any concerns not be able to be resolved within the Company, the complaint would be referred to the BPU Division of Customer Assistance.

Quality Control for Reporting

The Company has developed an enterprise-wide EE&C Tracking and Reporting System in partnership with a third-party vendor to support regulatory required EE&C reports across any jurisdiction in its footprint. In addition, the Company will utilize SAP[2] enterprise software for financial management and reporting of program costs.

4b. Workforce Development and Job Training (MFR II.b.ii)

JCP&L recognizes the importance of supporting Workforce Development Programs, and references the EMP, which states:

> A modern, educated workforce will be required to fill the new job opportunities created by New Jersey's growing clean energy economy. This economy includes the development of new industries such as offshore wind, the ramp-up of research and development in sub-sectors such as battery storage, and the expansion of existing sectors such as solar (rooftop and community) and energy efficiency. As these areas expand over the coming years, declining industries will be simultaneously shedding workers, and skill gaps will emerge. It is critical that state agencies work together with business leaders, educational institutions, and communities to develop programs that both train new workers and support those transitioning. Such programs are critical in providing New Jersey's workforce with the necessary skills to thrive in a 21st century economy. Developing a local population of trained energy professionals will ensure that there is a sufficient workforce to support the expansion of New Jersey's clean energy economy and that the economic benefits of this expansion stay within the state.[3]

A strong pool of qualified candidates is necessary to meet the increasing requirements and opportunities associated with the State's EE, DR, and BD goals. Meeting these goals will require a significant increase in customer and trade ally participation as the Company strives to meet the energy savings, demand reduction, and BD program targets. The Company will continue to work with the EE Workforce Development Working Group to support opportunities to address training

[2] SAP, which stands for System Applications and Products, is the Company's Enterprise Resource Planning software
[3] 2019 Energy Master Plan, Section 7.2

needs, career paths, trade ally needs, and contracting provisions. The Company will also work with peer utilities and look for areas of need and opportunities to fill any gaps in training requirements, to identify areas that will require additional resources, and to partner with peers to avoid duplicative commitment of resources and funding. Additionally, the Company will seek to identify and leverage opportunities to develop partnerships with New Jersey Department of Labor and workforce development initiatives to generate and fund workforce development initiatives.

JCP&L has been an active participant in the EE Workforce Development Working Group, working to share anticipated program hiring needs and to understand the interests, feedback, and concerns of other stakeholders. The Company anticipates that this Working Group will continue to provide input that will help shape the slate of programs and policies. The Company plans to improve and develop a robust pipeline of workers able to meet the needs of a growing EE industry in New Jersey. In addition, the Company plans to ensure that local, underrepresented, and disadvantaged workers are included in those opportunities, consistent with State policy directives.

Training Needs and Career Paths

To address the availability of workforce resources required to successfully fulfill program services, JCP&L plans to support training for the skill sets necessary for implementation of programs and projects—including energy auditing, marketing, and customer service and support—ongoing analysis of cost benefits and costs, and evaluation measurement and verification of savings. Additionally, as the BD program represents new measures, the Company will seek to provide workforce training opportunities for any specific requirements of this initiative. Examples of the trades required are HVAC technicians, plumbers, electricians, and insulation contractors. For the BD program in particular, electricians will play a critical role in wiring upgrades needed for additional building electric loads. Quality control, cost effective analysis, and EM&V may require analysts and auditors (*e.g.*, for energy modeling and evaluation, customer service, financial tracking, and demographic analysis).

The Company recognizes that these positions require a broad range of technical training and educational experience and will look to partner with New Jersey-based vocational institutions, community colleges, universities, community-based organizations, and nonprofits. The Company looks forward to continuing collaboration with the EE Workforce Development Working Group and expects the discussions will continue to include insights from successful models in other states and other industries, as well as efforts already underway in New Jersey.

Trade Ally Needs

While ensuring trained resources are available is an essential aspect of workforce development, the utilities also recognize there must be a pool of employers interested in hiring these individuals. JCP&L recognizes that it must also engage the open market to understand the needs of contractors and other firms. Organizations like the New Jersey Air Conditioning Contractors Association, the New Jersey Association of Plumbing, Heating, and Cooling Contractors, and the New Jersey Association of Energy Engineers provide industry leadership and guidance to energy businesses and should be included in discussions to guide policies and be engaged in training programs to meet the needs of existing and new contractors.

Consistent with State policy, as outlined in the EMP and expanded upon in the Orders, the Company, together with the EE Workforce Development Working Group, will also explore paths that can help MWVBEs, as well as both individuals and underrepresented businesses located in OBCs, to grow and thrive in the clean energy economy.

Contracting Provisions

JCP&L will follow internal procurement protocols, which include consideration of the amount of business placed with MWVBEs, for services necessary to implement its programs. Additionally, the Company will encourage the hiring of local, underrepresented, and disadvantaged workers, and subcontracting with minority-, women-, and veteran-owned and other underrepresented businesses with its program implementation providers throughout program implementation.

Budget Considerations for Workforce Development Programs

JCP&L proposes a total budget of $600,000 per year for workforce development, as presented in Appendix B. This budget is intended to ensure adequate funding to launch and maintain programs, including DR and BD. The Company will also pursue State-funded grants and utilize any wrap-around supportive services offered by the State.

4c. Customer Access to Usage Data (MFR II.b.iii)

JCP&L provides access to energy usage data to its customers through the customer's online accounts where customers are initially provided 12 months of energy usage data and bar graphs illustrating their usage over time. The Company also provides an "Analyze Usage" function option through customer online accounts that provides up to 24 months of energy usage data, temperature, and meter reading types along with energy costs. Additionally, hourly energy usage data is available for up to 24 months for customers with interval meters.

As part of its plan to modernize the electric distribution system, the Company began installing smart meters/AMI on customers' homes and businesses throughout its service territory in 2023, with most customers scheduled to receive a smart meter by 2026. This will provide customers with additional information they need to better manage their electricity use.

Customers will be able to access AMI data, when available, through the customer's online accounts providing access to a web presentment portal. For C&I presentment, data will be presented as 15-minute intervals, daily, or monthly upon customer request. For Residential presentment, data will be presented as hourly, daily, or monthly based on customer request.

In addition to online presentation of energy usage data, the Company also provides a "Green Button" function to customers through their online accounts and "Analyze Usage" function where customers can download their energy usage data in CSV or XML format. Additional historic energy usage data beyond 24 months can be obtained where available using this function.

The Company will also provide a billing usage statement to customers who make a request through the Company's contact center. The statement includes 12 months of history, including the read date, meter reading, consumption usage, days in billing period, daily use, and read type, in addition to other billing information.

4d. Marketing Plan (MFR II.b.vii)

JCP&L will implement multi-pronged direct and indirect marketing campaigns to promote residential and non-residential programs to all eligible customers across the Company's electric service territory. Customers will be exposed to broad-based EE and DR awareness campaigns, web-based engagement and information, digital advertising, social media, and hard-copy materials to promote awareness, as well as tie-ins with other programs. Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the programs where applicable. A combination of strategies will be used to train and support retailers, distributors, and other program allies, including media advertising, outreach community forums, events, and direct outreach to customers.

The Company will also continue to engage community partners, chambers of commerce, and other local organizations, including those comprised of underrepresented and socially or economically disadvantaged individuals. Educating building owners and operators about the benefits of EE improvements and improved systems performance—including through educational brochures, customer and partner seminars, program promotional material, platforms, and website content—will be key to promoting the programs. The Company will also consider the potential to utilize customer information analytics or other targeted energy education outreach to identify and target customers best suited for participation in the programs. The collective marketing plan strategy is useful for enrolling eligible customers that may be interested in participating in the programs but have not heard of or are unaware of such programs, or do not have the time or resources to prioritize investigating EE opportunities or reaching out to the Company.

The Company's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. The Company will continue to engage with the BPU Marketing Group and the Joint Utilities to strategize about evolving approaches to marketing and to employ best practices and consistent messaging, where practicable. To the extent possible, the Company will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this Plan and eliminate barriers to participation.

Marketing programs will be developed to encompass core and sector level programs, and, in each case, market barriers will be identified and addressed. Marketing programs for the following known market barriers will be tailored for each program and subprogram as necessary:

- **Initial Cost**: Relative to the market baseline for all segments, efficient equipment, energy assessments, and retrofits are more expensive, and often carry a higher upfront cost but a lower lifetime operating cost. Customers often may not fully value the lifetime operating cost advantage of efficient equipment, and, as a result, higher upfront costs are a barrier to purchasing efficient equipment, replacing existing equipment with new energy efficient equipment, or having an assessment done on their home, business, school, or other property. To address this barrier, the Company will educate customers and market incentives to reduce or eliminate the initial or upfront costs. OBR or access to financing with similar terms will also be promoted to help mitigate the upfront cost barriers.

- **Customer Awareness and Engagement**: Customers may not be aware of the benefits of installing efficient equipment or lack the time and resources to pursue or research efficient equipment alternatives when replacing existing equipment. To address this barrier, the Company will educate customers on the benefits of installing efficient equipment through targeted marketing campaigns, ensure that incentives are easily accessible, and provide tips and recommendations to customers that promote available EE&C programs. Through outreach efforts, the Company will seek to partner with retail and wholesale entities to promote program offerings. Further, the Company will also focus marketing, education, and outreach efforts on trade ally and community focused groups to ensure that both are aware of available incentives and are prepared to serve and educate customers on savings, benefits, and incentive opportunities associated with EE&C programs. Potential community focused partner groups may include but not be limited to organizations such as the Chamber of Commerce, local food banks, faith-based organizations, and the Small Business Administration. To increase awareness among customers with English as a second language, JCP&L will develop and provide outreach materials in Spanish. The Company intends to be active participants in both the Equity or Marketing Working Groups and expect to address the need and cost for developing materials in a broader range of languages as part of those discussions.

- **Landlord/Tenant Arrangements**: Split incentives between landlord/tenants with respect to whom pays for energy use vs. who owns the energy-using equipment can be a challenge to investment decisions. To address this barrier, applicable programs will be marketed to both landlords and tenants to assure that those exposed to energy costs are able to participate in the program. The Company may also provide technical and outreach assistance to property owners and managers in developing and marketing green properties to attract tenants.

- **Trade Ally Awareness and Training**: To meet the participation goals, sufficient contractors must be available to undertake the work. The Company will address this barrier by trying to recruit more contractors to secure the additional certifications necessary to participate in the programs, including pursuing initiatives that align with the EE Workforce Development Working Group's strategies to include more local, underrepresented, and disadvantaged workers.

Residential

As outlined above, JCP&L will implement multi-pronged direct and indirect marketing campaigns to promote residential programs and to assure subprogram awareness and participation is maximized. The Company will explore opportunities to provide customized information to customers with prioritized action items to maximize availability and uptake. A combination of strategies will be used to train and support retailers, distributors, and other program allies, including media advertising, outreach community forums, events, and direct outreach to customers. Point-of-purchase signage will be placed near discounted/rebated products in participating retail stores. The Company will also look to leverage the behavior program for "warm leads" into the programs through both the home energy reports and online audit tool.

The residential programs are designed to minimize barriers to participation, including, among others, customer awareness, split incentives resulting from landlord-tenant arrangements, the availability of energy efficient products, the upfront costs of EE upgrades, and health and safety barriers. The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, and marketing/advertising, as well as improvement opportunities. The Company's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, the Company will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this Plan.

Commercial and Industrial

Marketing will specifically target C&I and governmental entities within JCP&L's service territory depending upon the subprogram offering. The Company will continue to leverage relationships with municipalities, universities, schools, and other public agencies to promote programs and increase awareness. In addition, the Company will conduct further outreach through school, university, healthcare facilities, nonprofits, and municipal trade associations.

The Company will leverage existing relationships with C&I customers to promote the overall program. The program will be specifically marketed as a comprehensive solution for a customer to improve the energy performance of its building by utilizing many of the services that the program offers. The subprogram will leverage the Company's existing relationships and communication channels with customers through subprogram staff and account management teams.

The C&I programs are designed to minimize barriers to participation, including business/operational constraints, customer awareness and engagement, and cost effectiveness. The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, and marketing/advertising, as well as improvement opportunities. The Company's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver a best-practice subprogram that identifies and confronts market barriers on an ongoing basis. To the extent possible, the Company will cross-promote other programs and subprograms to spread awareness of the range of efficiency opportunities proposed in this Plan.

Through outreach and partnership efforts, the Company will focus marketing, education, and outreach efforts to expand awareness and education to customers on savings, benefits, and incentive opportunities associated with EE&C programs. The Company may also explore providing outreach materials in Spanish to reach Spanish-speaking business owners.

For small business customers, nonprofit organizations, and faith-based customers, the Company intends to overcome these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers at no cost, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds awareness and trust and achieves results while increasing the

likelihood of further participation referrals. To increase participation rates among a diverse demographic, the Company may include focused outreach efforts to reach minority- and women-owned small businesses and start-ups by engaging with business groups and organizations that support these customers.

Multifamily

The marketing strategy will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the program and how to participate. Marketing activities will also target the LMI multifamily sector. Key elements of the marketing strategy may include: targeted outreach through direct mailings and presentations to inform property owners, property managers, apartment associations, tenant groups, municipalities, and community organizations about the benefits of the program; printed marketing materials highlighting the benefits and features of the program as well as the enrollment and participation processes; website content providing program information resources and contact information; in-person visits by program representatives to properties with three or more units; and, lastly, energy assessments of properties. These energy assessments may involve implementing standard energy-saving measures to encourage, educate, and incentivize building owners or facility managers to take part in additional program options aimed at achieving more substantial savings.

The multifamily programs are designed to minimize barriers to participation, including business/operational constraints, customer awareness and engagement, cost effectiveness, split incentives, and complex buying processes. The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for effective program design, delivery, outreach, and marketing/advertising, as well as improvement opportunities. The Company will leverage its established customer relationships, communication channels, data, and brand in the marketplace to identify and confront market barriers on an ongoing basis.

Additional Utility Led (Next Gen Savings, BD, DR)

The marketing of these programs will be provided by TPICs managed by JCP&L personnel. Other marketing activities may target program allies, trade allies, and customers, where applicable, to inform them of the program, its components, and the associated benefits to participation. The Company or the TPICs may recruit program or trade allies throughout program implementation. The Company or the contractors may also market and/or cross market the program offerings to customers through bill inserts, social media, email, online marketing, direct mail, print, newspaper and radio advertisements, Home Energy Reports, point-of-sale displays at retailers, in-store, community events, and the Company's website. The contractors will design and produce all materials needed to promote the program, including promotional signage, informational brochures, and rebate forms.

4e. Evaluation, Measurement and Verification (MFR VI.a.)

The utilities recognize the importance of incorporating Evaluation, Measurement and Verification ("EM&V") into the EE, DR, BD start-up, and other programs. EM&V can help assess whether

program objectives are being achieved, document energy and non-energy benefits, and inform both future program modifications and development. PJM Interconnection, L.L.C. ("PJM") specific EM&V will also be needed to support utility EE Offers into PJM's Capacity Market.

The utilities will continue to work with the State-Wide Evaluator ("SWE") and contribute to the EM&V working group. Evaluation activities, products, and processes will be completed consistent with the New Jersey Energy Efficiency Triennium 2 Evaluation Framework and subsequent guidance documents by Staff and the SWE. Further, each utility has included funding to support the anticipated evaluation work within their respective filings. Proposed budgets for evaluation are reflected in Appendix B.

Common Definitions and Objectives

The State and Local Energy Efficiency Action Network offers resources, discussion forums, and technical assistance to state and local policymakers as they seek to advance EE. The EE Program Impact Evaluation Guide from December 2012 identified three primary objectives for evaluations.

- **Document the benefits** (*i.e.*, impacts) of a program and determine whether the subject program (or portfolio of programs) met its goals.
- **Identify ways to improve current and future programs** through determining why program-induced impacts occurred.
- **Support energy demand forecasting and resource planning** by understanding the historical and future resource contributions of EE as compared to other energy resources.

That same guide provides the following standard categories of evaluations:

- **Impact evaluations**: Assessments that determine and document the direct and indirect benefits of an EE program. Impact evaluation involves real-time and/or retrospective assessments of the performance and implementation of an efficiency program or portfolio of programs. Program benefits, or impacts, can include energy and demand savings and non-energy benefits (sometimes called co-benefits or non-energy impacts, with examples being avoided emissions and water savings). Impact evaluations can also include cost-effectiveness analyses aimed at identifying relative program costs and benefits of EE, as compared to other energy resources, including both demand- and supply-side options.
- **Process evaluations**: Formative, systematic assessments of an EE program from both a customer and program administrator viewpoint. Process evaluations document program operations and identify and recommend improvements that are likely to increase the program's efficiency or effectiveness for acquiring EE resources and improve the customer experience with the program.
- **Market evaluations**: Assessments of structure or functioning of a market, the behavior of market participants, and/or market changes that result from one or more program efforts. Market evaluation studies may include estimates of the current market role of EE (market baselines), as well as the potential role of efficiency in a local, state, regional, or national market (potential studies). Market evaluation studies indicate how

the overall supply chain and market for EE products works and how they have been affected by a program. These evaluations can also include assessments of other societal, customer, or utility benefits of EE programs, such as the economic and job creation impacts of the programs, health benefits to society, or transmission and distribution benefits to utilities. And, finally, these studies can also be used to inform changes to the portfolio of efficiency measures to be offered to customers, or the savings achieved by the measures.

Monitoring and Improving Program and Portfolio Performance

There is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design and implementation and impact evaluation are elements in a cyclical feedback process. Initial program design is informed by prior baseline and market potential studies. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

Budget Considerations for EM&V Work

As noted, proposed budgets for EM&V are reflected in Appendix B. These budgets were established at or below the industry standard for this type of work, excluding the cost of financing and any anticipated costs associated with additional studies performed at the direction of the BPU Staff or the EM&V Working Group.

TRM Considerations

The utilities will utilize the TRM applicable to determining CEA savings compliance at the time when a project is committed to calculate energy savings for that project, regardless of when the project is complete.

4f. Reporting Plan (MFR VIII)

The utilities will continue to comply with the reporting requirements for EE, DR, and BD programs outlined in the Orders, as well as related guidance from Staff and the Board.

If the impact of interactive effects would cause a utility to miss a quantitative performance indicator ("QPI") target due to a change in the measure mix implemented by customers when compared to Plan assumptions, the utility should not be penalized. If the overall QPI would result in an ROE penalty under this scenario, the utility reserves the right to remove negative savings in order to avoid incurring a penalty.

4g. Overburdened Community Standardization

Utilities will focus their efforts to provide equitable access to EE for residential customers residing in an OBC that is defined by a low-income designation. In accordance with treatment during Triennium 1 and guidance from BPU Staff, only customers in the following OBC categories, as defined by the New Jersey Department of Environmental Protection1 ("DEP"), will be tracked and

reported:

- Low Income;
- Low Income & Limited English;
- Low Income & Minority; and
- Low Income, Minority & Limited English.

Additionally, in order to ensure consistent reporting across the utilities and throughout Triennium 2, the utilities will utilize the dataset available from August 31, 2023, on the DEP's website (data created and last updated on 4/10/23) to track and report OBC participation in the programs, including for the purposes of establishing and evaluating the QPIs.

Consistent with Triennium 1, Utilities will deploy approaches to target the market or pre-screen customers based on the location of their primary residence within the boundaries of census tracts federally recognized as low or moderate income and a self-attestation for income qualified programs or enhanced incentives under other programs (*e.g.*, Energy Efficient Products program).

Utilities plan to report actual performance of LMI customers and customers within OBCs, as defined above, and are committed to strengthening the infrastructure to support enhancements for customer screening for LMI customers and reporting equity metrics for both LMI and OBC customers.

As noted in the New Jersey Utilities Association comments filed in response to the Straw Proposals within this docket, the utilities continue to believe there is an opportunity to further streamline administration and eliminate a barrier to participation by allowing any applicant from a qualifying OBC community to access the enhanced level of benefits. The utilities recognize that the May 24th Order called for continued self-attestation in those areas but believe this decision is worth reconsideration within these cases.

4h. Financing/On Bill Repayments Description

JCP&L proposes to continue providing access to financing in Triennium 2, in furtherance of its EE goals. The residential, multifamily, and C&I programs incorporate various strategies to help customers reduce energy use through changing behaviors and investments in EE projects. The programs are designed to take advantage of incentives to promote adoption of energy efficient behaviors and to address initial cost barriers with more efficient equipment. Continuing to provide a financing option to defray the initial investment associated with efficiency upgrades further promotes increased participation of qualifying customers. The Company firmly believes that low- to no-cost financing options are an important option for some customers to overcome their financial barriers to participation (*e.g.*, small business or moderate-income residential customers). The Company also believes that low- to no-cost financing will be necessary to achieve the increasingly aggressive goals during Triennium 2 and notes that financing is common in states that achieve high levels of savings.

To provide access to financing initially, the Company plans to contract with a third-party to administer providing low- to no-interest loan opportunities for qualifying customer investments in EE and BD projects, with the option to move towards Company administration and/or on-bill repayment. The Company has budgeted estimated costs for loan principal funded by the Company,

and administrative costs associated with continuing to provide loans in Triennium 2. The loan administrator will be responsible for screening customers for eligibility and all loan origination and processing activities. The Company intends to work with the other NJ utilities throughout implementation to continue to provide comparable financing offerings to customers and deliver similar access across the coordinated programs.

The Company's financing proposal allows customers to have the flexibility and convenience of being able to pay for higher-priced EE products and projects over a period of time that better aligns with the time frame that they will be reaping the bill savings. The Company plans to make this financing option available for customers participating across the Residential, Multifamily, and C&I Sector programs where qualifying measures involve a sizeable cost to the customer, including major appliances, HVAC, home retrofit and multifamily projects, small business direct install projects, C&I prescriptive and custom measures, and Energy Solutions projects.

The following table summarizes the programs, eligibility, and terms associated with the Company's financing proposal for qualifying EE and decarbonization projects:

Table 6: Program Financing Overview

Program	Eligibility	Terms[1]	
Whole Home	Comprehensive retrofit projects, balance of project cost	Maximum to be financed	Up to $25,000
		Interest Rate	Up to 2.99%
		Term	Up to 7 years <=$10,000; Up to 10 years > $10,000
Efficient Products	Efficient program eligible major appliances, HVAC and water heating equipment	Maximum to be financed	Up to $25,000
		Interest Rate	Up to 2.99%
		Term	Up to 7 years
Multifamily	Comprehensive retrofit projects, prescriptive/custom equipment, Engineered Solutions projects, balance of program eligible project cost	Maximum to be financed	Up to $3,000/unit and balance of project cost
		Interest Rate	Up to 2.99%
		Term	Up to 10 years, depending on eligibility
Energy Solutions	Comprehensive retrofit projects, prescriptive/custom equipment, Engineered Solutions projects, balance of program eligible project cost	Maximum to be financed	Up to balance of Project Cost
		Interest Rate	Up to 2.99%
		Term	Up to 7 years
Direct Install	Balance of program eligible project cost	Maximum to be financed	Up to balance of Project Cost
		Interest Rate	Up to 2.99%
		Term	Up to 7 years
Prescriptive/Custom	Efficient program eligible Prescriptive/Custom equipment	Maximum to be financed	Up to balance of Project Cost
		Interest Rate	Up to 2.99%
		Term	Up to 7 years
Building Decarbonization	Balance of program eligible project cost	Maximum to be financed	Up to balance of Project Cost
		Interest Rate	Up to 2.99%
		Term	Up to 7 years

[1] *Minimum amounts to be financed may be required based on program, economic or other market conditions*

4i. Energy Efficiency As A Resource

The Board Orders for the Second Triennium of Energy Efficiency and Peak Demand Reduction Programs require electric utilities to offer eligible EE Resources from programs they have led into applicable PJM Base Residual Auctions ("BRAs") and/or participate to true up market positions in Incremental Auctions ("IAs") or secondary markets as available or necessary. JCP&L intends to offer in EE peak reduction values from programs consistent with the Order and PJM's governing Manuals 18 and 18B. The Company plans the following considerations and processes for use in the development of its EE resource values to facilitate participation in the PJM Capacity Auctions.

- Offer in resources from programs where JCP&L has served as the lead utility.
- Identify and remove energy savings from PJM ineligible measures.
- Establish JCP&L Capacity Rights to the EE resources offered to avoid double counting of EE resources by third parties.

- Categorize all PJM eligible measures by PJM Program name.
- Segregate EE resources provided for NJ fiscal year (July-June) into the applicable PJM delivery year (June-May).
- Assign a savings load shape to each PJM eligible EE measure.
- Determine the kW savings values for each measure for the PJM defined Summer and Winter periods using the appropriate load shape curve values accounting for HVAC interactive factors and fuel type (PJM Capacity Performance kW is the lesser of the Summer or Winter kW values by installation period).
- Include T & D line losses to adjust retail kW values to wholesale kW values.
- PJM kW values for any Point of Sales (POS), Mid-Stream, and Up-Stream Programs include adjustments. Measures from these programs require additional PJM EM&V and annual persistence studies to ensure offered EE measures are initially installed in the JCP&L load zone and remain in service during each applicable delivery year.
- Recognize that EE resources have a limited offer duration of four years with additional installation period limitations.
- Recognize that PJM Auctions have been delayed and some IA auctions cancelled and as such, EE resources for some installation years may not come to fruition or no longer be eligible for inclusion in BRA and IAs.

EE Offers are made in Installed Capacity (ICAP) values but clear in Unforced Capacity (UCAP) values based on PJM's Planning Parameters for each specific auction. The UCAP values that clear an auction will remain the obligation for the delivery year regardless of subsequent IA parameter changes. True ups may be needed during incremental auctions or at a minimum the Third IA when parameters become final, to either purchase any shortfall resources or possibly sell any excess resources.

JCP&L will develop its EE offers with the intent to avoid penalties or losses. If JCP&L incurs any PJM penalties or losses, per the Order the Company will petition to recover such losses or penalties incurred in subsequent cost recovery filing, providing support that the Company exercised prudence in our FCM offers and acted reasonably with respect to our positions in the IAs or in the secondary market.

If JCP&L determines that its participation in the PJM FCM will not be cost-effective for NJ customers, in other words, that JCP&L anticipates that the costs required to obtain the revenues will exceed the revenues obtained, the Company will seek a waiver of the requirement.

All EE sell offer values and buy bids shall remain confidential as they are considered market sensitive information. The Company will submit confidential reports to Staff and Rate Counsel after every auction providing the offered and cleared EE resource MW values and clearing prices.

5.0 CONSISTENT DELIVERY IN OVERLAPPING TERRITORIES

NJ Utility Approach to Coordinated Program Delivery and Budgeting (MFR II c.)

In response to the New Jersey Board of Public Utilities' Framework Orders[4] directing each electric public utility and gas public utility in the State of New Jersey to establish energy efficiency ("EE") and peak demand reduction ("PDR") programs for the second triennium of programs implemented pursuant to the Clean Energy Act of 2018, the New Jersey investor-owned electric and gas utilities are collaborating in order to implement programs in a consistent manner and develop supportive processes, procedures, requirements, and forms.

Coordinated Program Offerings

To support the coordinated delivery of core programs and certain additional program offerings in situations that involve gas and electric savings opportunities in overlapping utility territories, the Utilities have established a framework that will align key program elements through use of Interconnected Tracking Systems supported by use of a Statewide Coordinator System, aligned Utility Responsibilities, and Coordinated Program Elements as further described below. This structure will support the coordinated delivery of appropriate energy efficiency measures, if offered, in the following Programs:

Core Offerings[5]

- Whole Home
- Income Qualified[6]
- Energy Efficient Products
- Energy Solutions
- Direct Install
- Prescriptive & Custom
- Multifamily

Additional Utility-Led Offerings

- Next Generation Savings (depending upon the project/technology)

Interconnected Tracking Systems

[4] See June 10, 2020 Order, BPU Docket Nos. QO19010040, QO19060748, and QO17091004; May 24, 2023 Order, BPU Docket Nos. QO19010040, QO23030150 & QO17091004; and July 26, 2023 Order, BPU Docket Nos. QO19010040, QO23030150 & QO17091004

[5] The Behavioral Program is not included in this list because there are no shared savings and therefore no need to coordinate across utilities.

[6] Income Qualified represents the proposed combination of the current Moderate Income Weatherization program with Comfort Partners. As noted in the Comfort Partner Transition Plan (Appendix I), Comfort Partners projects would continue to be coordinated through existing information systems for the initial year of 2nd Triennial.

To support consistency across the State and to align the above coordinated program offerings, the utilities will utilize a single third-party entity to serve as a Statewide Coordinator ("SWC") for measures and costs that impact more than one utility in situations where gas and electric service territories overlap. This entity provides a software platform to validate the local gas and electric company serving the customer and perform independent allocations of energy savings and costs for coordinated program offerings.

These costs and savings will be allocated between the utility that provides the program services (*i.e.*, the "Lead Utility") and the utility with whom the services were coordinated (*i.e.*, the "Partner Utility").

In areas where gas and electric service territories overlap, the utilities will design program elements that support consistent delivery of the above coordinated program offerings among all the utilities to enable the SWC to allocate shared costs and energy savings appropriately based on the fuel types impacted by EE measures.

Statewide Coordinator System Responsibilities

- Serve as a central platform to ensure data minimums required for coordinated data elements, exchange protocols, and serve as a repository for shared measure costs and shared savings for applicable programs.
- Track participation specific to utility programs that require coordination (*e.g.*, screen prior participation in coordinated program offerings).
- Serve as a clearing house for pre-determined data formats and exchanges.
- Perform allocation of dual-fuel or partner-fuel savings and cost for customers with separate gas and electric utilities, to facilitate sharing of costs and investments.
- Determine and provide supporting reports respective to utility invoice balances for allocation of shared measure costs (*e.g.*, costs of respective measures and share of costs).
- Provide monthly reports of coordinated program activity so that customer participation and program results may be tracked.

Utility Responsibilities

The Utilities will implement certain program operations through either internal resources, or under contract with third-party implementation contractor(s) ("TPIC"), outside of the Statewide Coordinator system. By retaining these functions, the Utilities can maintain a strong line of sight to program operations and still work collaboratively with the other Utilities in offering coordinated programs to New Jersey customers. These functions may include, where appropriate:

- Customer enrollment
- Developing consistent enrollment forms to collect agreed-upon customer information to share between the utilities
- Screening and qualifying contractors for Utility programs
- Customer care functions

- Marketing of programs
- Providing in-home/business auditing or direct-install of efficiency measures
- Communicating availability of customer financing options
- Integrating with other Utility programs
- Sponsoring EE program applications including paying incentives to customers and contractors
- Invoicing peer Utility partners for coordinated program costs

Coordinated Program Elements

As envisioned by the Board's direction on coordinated program offerings, the utilities' programs are designed to minimize customer confusion and present consistent opportunities for customer participation with access to both electric and gas measures, where appropriate. The utilities recognize that programs will continue to evolve and commit to ongoing collaborative efforts among the utilities to continue program alignment. Ongoing efforts will include a focus by the Utilities to standardize the following where appropriate:

- Common forms for contractors and customers with uniform field requirements
- Contractor minimum requirements and credentials for applicable programs
- Eligible customers and property requirements
- Eligible measures
- Incentive structures through use of an agreed-upon standard incentive range
- Software platforms or interfaces to be used by contractors
- Targeted bonus approaches for customers that meet specific policy priorities (*e.g.*, income qualified, targeted geographic locations).

Program Assumptions

The utilities have standing sector specific committees (Residential and C&I), as well as specialized committees (*e.g.*, EM&V), which have been active since early 2020. They routinely meet to address coordination issues, share feedback regarding program activity, and plan for future modifications/enhancements. As part of planning for this filing, the utilities have reviewed assumptions on average project size and related EE measures but did not mandate identical assumptions. Comparisons have shown that there can be variations in market activity across service territories. The flexibility in the approach to offer incentives within approved incentive ranges enables utilities to remain responsive to the market conditions within their respective service territories.

Budgeting

The Utilities recognize the importance of creating a solution that allows a Lead Utility to pursue their approved program portfolio to ensure they are able to meet their Clean Energy Act obligations and to be in a position to support any shared or cross-fuel energy savings from their

Partner Utility. It is critical that such a structure minimizes the potential for any disruption to the market and provides customers with equitable access to the programs, regardless of their geographic location. Given the fact that it is impossible to predict where the energy savings will occur within a utility's service territory, it is not practical to determine what a utility's potential budget obligation could be from specific overlapping utilities. The utilities have proposed an approach that will minimize the potential for cross-subsidization that exists under the existing mechanism. Under this approach, the customers of each utility would support the costs specific to the fuel that utility provides. As a result, the utilities have developed a proposed budget adjustment mechanism, which is outlined in each utility's Petition (see the Company's Petition beginning at page 8).

6.0 APPENDICES

As noted above, all of the appendices are formatted similarly and in the same order, but present utility-specific information, with the exception of Appendix I: Comfort Partners Transition Plan which are consistent for all utilities. Appendix H: Incentive Ranges is formatted similarly but has some variation due to differences in utility specific program proposals.

7.0 LIST OF TABLES

Appendix A: Program Participants & Energy Savings* by Program Year (MFRs II.a.vii & II.a.viii)												
Program	PY4 Participants	PY4 Net Annual Energy Savings (kwh)	PY4 Net Annual Energy Savings (therms)	PY5 Participants	PY5 Net Annual Energy Savings (kwh)	PY5 Net Annual Energy Savings (therms)	PY6 Participants	PY6 Net Annual Energy Savings (kwh)	PY6 Net Annual Energy Savings (therms)	Total Participants	Total Net Annual Energy Savings (kwh)	Total Net Annual Energy Savings (therms)
Whole Home	34,880	7,473,028	467,580	75,261	15,010,625	1,008,925	76,269	14,502,356	1,022,557	186,410	36,986,010	2,499,061
Income Qualified	1,832	1,041,172	-	3,952	2,235,896	-	4,008	2,260,419	-	9,792	5,537,487	-
Energy Efficient Products	107,388	9,940,214	1,070,182	197,378	18,076,759	1,887,663	200,019	18,131,428	1,912,827	504,785	46,148,400	4,870,672
Behavioral	310,000	7,825,000	179,136	310,000	39,300,000	386,433	310,000	40,700,000	391,908	930,000	87,825,000	957,477
Energy Solutions	606	37,022,776	746,344	1,258	83,807,024	1,922,557	1,274	85,287,469	1,965,740	3,138	206,117,268	4,634,641
Prescriptive / Custom	4,700	45,064,115	(1,048,927)	9,255	80,895,194	(1,856,458)	9,875	76,838,964	(1,878,238)	23,831	202,798,272	(4,783,622)
Direct Install	589	20,461,267	2,251,300	1,465	51,150,093	5,630,260	1,483	51,724,103	5,695,820	3,537	123,335,463	13,577,380
Multifamily	102	903,362	201,162	221	1,913,454	433,264	224	1,930,959	438,725	547	4,747,775	1,073,151
Next Generation Savings	-	-	-	-	-	-	-	-	-	-	-	-
CVR	-	8,750,000	-	-	21,875,000	-	-	21,875,000	-	-	52,500,000	-
Building Decarbonization	634	-	-	2,512	-	-	2,513	-	-	5,659	-	-
Load Optimization & PDR	27,000	-	-	186,145	-	-	346,000	-	-	559,145	-	-
Portfolio Total	**487,731**	**138,480,934**	**3,866,777**	**787,447**	**314,264,044**	**9,412,644**	**951,666**	**313,250,697**	**9,549,340**	**2,226,844**	**765,995,675**	**22,828,760**

** Excludes any impacts beyond PY6.*

*** Net annual energy savings presented at site-level includes both electric and natural gas savings for coordinated programs delivered by the lead utility*

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix B: Program Budgets and Costs by Program Year* (MFRs II.a.ix & II.a.x)											
Total Program Years 4-6 (PY2025-PY2027)	**Capital Cost**	**Utility Administration**	**Marketing and Outreach**	**Outside Services**	**Incentives - Rebates and Loans**	**Inspections and QC**	**Evaluation**	**Health & Safety**	**Workforce Development**	**Outreach to Community-Based Organizations**	**Total Budget**
Whole Home	$ -	$ 890,260	$ 764,965	$ 19,224,176	$ 81,749,658	$ 870,888	$ 1,138,499	$ -	$ -	$ -	$ 104,638,446
Income Qualified	$ -	$ 1,876,695	$ 487,742	$ 3,017,508	$ 42,840,000	$ 586,460	$ 246,220	$ 7,711,200	$ -	$ -	$ 56,765,825
Energy Efficient Products	$ -	$ 540,456	$ 1,161,067	$ 12,545,701	$ 75,908,479	$ -	$ 991,713	$ -	$ -	$ -	$ 91,147,416
Behavioral	$ -	$ 280,768	$ 83,585	$ 6,358,658	$ -	$ -	$ 73,953	$ -	$ -	$ -	$ 6,796,963
Residential Total	**$ -**	**$ 3,588,179**	**$ 2,497,359**	**$ 41,146,042**	**$ 200,498,137**	**$ 1,457,348**	**$ 2,450,385**	**$ 7,711,200**	**$ -**	**$ -**	**$ 259,348,649**
Energy Solutions	$ -	$ 3,056,154	$ 3,034,451	$ 67,233,123	$ 201,057,538	$ 2,431,383	$ 3,044,939	$ -	$ -	$ -	$ 279,857,588
Prescriptive / Custom	$ -	$ 1,253,109	$ 1,814,511	$ 27,435,932	$ 163,546,440	$ 1,548,252	$ 2,151,581	$ -	$ -	$ -	$ 197,749,825
Direct Install	$ -	$ 1,434,929	$ 864,096	$ 31,608,289	$ 103,502,033	$ 1,246,964	$ 1,525,219	$ -	$ -	$ -	$ 140,181,530
Commercial & Industrial Total	**$ -**	**$ 5,744,192**	**$ 5,713,057**	**$ 126,277,344**	**$ 468,106,011**	**$ 5,226,599**	**$ 6,721,739**	**$ -**	**$ -**	**$ -**	**$ 617,788,944**
Multifamily	$ -	$ 53,819	$ 78,557	$ 1,291,657	$ 8,237,672	$ 40,414	$ 106,723	$ -	$ -	$ -	$ 9,808,842
Multifamily Total	**$ -**	**$ 53,819**	**$ 78,557**	**$ 1,291,657**	**$ 8,237,672**	**$ 40,414**	**$ 106,723**	**$ -**	**$ -**	**$ -**	**$ 9,808,842**
Next Generation Savings	$ -	$ 220,765	$ 1,940,722	$ 3,129,964	$ 2,437,500	$ -	$ 85,018	$ -	$ -	$ -	$ 7,813,969
CVR	$ -	$ 125,000	$ -	$ 40,000	$ -	$ -	$ 62,500	$ -	$ -	$ -	$ 227,500
Building Decarbonization	$ -	$ 192,762	$ 994,966	$ 3,467,945	$ 40,002,453	$ 56,590	$ 491,862	$ -	$ -	$ -	$ 45,206,578
Load Optimization & PDR	$ -	$ 350,782	$ 322,380	$ 7,717,008	$ 13,206,545	$ -	$ 237,564	$ -	$ -	$ -	$ 21,834,279
Additional Utility Total	**$ -**	**$ 889,310**	**$ 3,258,067**	**$ 14,354,917**	**$ 55,646,498**	**$ 56,590**	**$ 876,944**	**$ -**	**$ -**	**$ -**	**$ 75,082,326**
Other Portfolio Costs	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,500,000**	**$ 625,000**	**$ 2,125,000**
Portfolio Total	**$ -**	**$ 10,275,500**	**$ 11,547,040**	**$ 183,069,960**	**$ 732,488,318**	**$ 6,780,951**	**$ 10,155,792**	**$ 7,711,200**	**$ 1,500,000**	**$ 625,000**	**$ 964,153,761**

Appendix B: Program Budgets and Costs by Program Year* (MFRs II.a.ix & II.a.x)											
Program Year 4 (PY2025)	**Capital Cost**	**Utility Administration**	**Marketing and Outreach**	**Outside Services**	**Incentives - Rebates and Loans**	**Inspections and QC**	**Evaluation**	**Health & Safety**	**Workforce Development**	**Outreach to Community-Based Organizations**	**Total Budget**
Whole Home	$ -	$ 171,102	$ 152,924	$ 3,919,151	$ 15,295,970	$ 162,955	$ 216,723	$ -	$ -	$ -	$ 19,918,825
Income Qualified	$ -	$ 376,698	$ 98,258	$ 672,357	$ 8,015,000	$ 116,660	$ 47,724	$ 1,442,700	$ -	$ -	$ 10,769,398
Energy Efficient Products	$ -	$ 118,506	$ 236,655	$ 2,908,196	$ 16,147,704	$ -	$ 213,522	$ -	$ -	$ -	$ 19,624,582
Behavioral	$ -	$ 54,953	$ 16,997	$ 1,312,282	$ -	$ -	$ 15,227	$ -	$ -	$ -	$ 1,399,458
Residential Total	**$ -**	**$ 721,259**	**$ 504,834**	**$ 8,811,986**	**$ 39,458,674**	**$ 279,615**	**$ 493,196**	**$ 1,442,700**	**$ -**	**$ -**	**$ 51,712,264**
Energy Solutions	$ -	$ 579,131	$ 604,131	$ 13,481,710	$ 36,174,766	$ 440,524	$ 564,083	$ -	$ -	$ -	$ 51,844,346
Prescriptive / Custom	$ -	$ 261,822	$ 369,234	$ 6,038,623	$ 32,777,360	$ 314,813	$ 437,380	$ -	$ -	$ -	$ 40,199,232
Direct Install	$ -	$ 242,540	$ 162,520	$ 5,663,740	$ 17,162,682	$ 207,617	$ 257,830	$ -	$ -	$ -	$ 23,696,930
Commercial & Industrial Total	**$ -**	**$ 1,083,494**	**$ 1,135,886**	**$ 25,184,073**	**$ 86,114,809**	**$ 962,954**	**$ 1,259,293**	**$ -**	**$ -**	**$ -**	**$ 115,740,509**
Multifamily	$ -	$ 12,980	$ 16,515	$ 324,033	$ 1,559,133	$ 7,750	$ 21,125	$ -	$ -	$ -	$ 1,941,534
Multifamily Total	**$ -**	**$ 12,980**	**$ 16,515**	**$ 324,033**	**$ 1,559,133**	**$ 7,750**	**$ 21,125**	**$ -**	**$ -**	**$ -**	**$ 1,941,534**
Next Generation Savings	$ -	$ 43,209	$ 388,365	$ 659,084	$ 487,500	$ -	$ 17,360	$ -	$ -	$ -	$ 1,595,517
CVR	$ -	$ 25,000	$ -	$ 10,000	$ -	$ -	$ 12,500	$ -	$ -	$ -	$ 47,500
Building Decarbonization	$ -	$ 43,308	$ 200,896	$ 851,889	$ 4,850,236	$ 6,340	$ 65,479	$ -	$ -	$ -	$ 6,018,148
Load Optimization & PDR	$ -	$ 62,251	$ 73,255	$ 1,432,582	$ 3,267,000	$ -	$ 53,186	$ -	$ -	$ -	$ 4,888,275
Additional Utility Total	**$ -**	**$ 173,768**	**$ 662,515**	**$ 2,953,555**	**$ 8,604,736**	**$ 6,340**	**$ 148,525**	**$ -**	**$ -**	**$ -**	**$ 12,549,440**
Other Portfolio Costs	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 300,000**	**$ 125,000**	**$ 425,000**
Portfolio Total	**$ -**	**$ 1,991,500**	**$ 2,319,750**	**$ 37,273,648**	**$ 135,737,351**	**$ 1,256,659**	**$ 1,922,139**	**$ 1,442,700**	**$ 300,000**	**$ 125,000**	**$ 182,368,746**

Appendix B: Program Budgets and Costs by Program Year* (MFRs II.a.ix & II.a.x)											
Program Year 5 (PY2026)	**Capital Cost**	**Utility Administration**	**Marketing and Outreach**	**Outside Services**	**Incentives - Rebates and Loans**	**Inspections and QC**	**Evaluation**	**Health & Safety**	**Workforce Development**	**Outreach to Community-Based Organizations**	**Total Budget**
Whole Home	$ -	$ 356,715	$ 306,833	$ 7,617,473	$ 33,004,716	$ 351,611	$ 458,011	$ -	$ -	$ -	$ 42,095,357
Income Qualified	$ -	$ 749,617	$ 194,860	$ 1,169,291	$ 17,290,000	$ 234,760	$ 98,692	$ 3,112,200	$ -	$ -	$ 22,849,420
Energy Efficient Products	$ -	$ 209,462	$ 462,732	$ 4,788,902	$ 29,680,874	$ -	$ 386,562	$ -	$ -	$ -	$ 35,528,532
Behavioral	$ -	$ 112,714	$ 33,757	$ 2,520,406	$ -	$ -	$ 29,336	$ -	$ -	$ -	$ 2,696,213
Residential Total	**$ -**	**$ 1,428,508**	**$ 998,181**	**$ 16,096,072**	**$ 79,975,590**	**$ 586,371**	**$ 972,600**	**$ 3,112,200**	**$ -**	**$ -**	**$ 103,169,522**
Energy Solutions	$ -	$ 1,226,251	$ 1,217,251	$ 26,693,382	$ 81,685,031	$ 986,749	$ 1,229,895	$ -	$ -	$ -	$ 113,038,560
Prescriptive / Custom	$ -	$ 491,588	$ 723,726	$ 10,625,172	$ 65,084,669	$ 612,318	$ 852,912	$ -	$ -	$ -	$ 78,390,385
Direct Install	$ -	$ 591,829	$ 352,247	$ 12,921,780	$ 42,919,693	$ 516,723	$ 630,325	$ -	$ -	$ -	$ 57,932,598
Commercial & Industrial Total	**$ -**	**$ 2,309,667**	**$ 2,293,224**	**$ 50,240,334**	**$ 189,689,394**	**$ 2,115,790**	**$ 2,713,133**	**$ -**	**$ -**	**$ -**	**$ 249,361,542**
Multifamily	$ -	$ 20,301	$ 31,080	$ 482,424	$ 3,321,350	$ 16,264	$ 42,586	$ -	$ -	$ -	$ 3,914,006
Multifamily Total	**$ -**	**$ 20,301**	**$ 31,080**	**$ 482,424**	**$ 3,321,350**	**$ 16,264**	**$ 42,586**	**$ -**	**$ -**	**$ -**	**$ 3,914,006**
Next Generation Savings	$ -	$ 88,626	$ 776,543	$ 1,233,272	$ 975,000	$ -	$ 33,808	$ -	$ -	$ -	$ 3,107,249
CVR	$ -	$ 50,000	$ -	$ 15,000	$ -	$ -	$ 25,000	$ -	$ -	$ -	$ 90,000
Building Decarbonization	$ -	$ 74,597	$ 397,341	$ 1,306,145	$ 17,574,631	$ 25,120	$ 213,156	$ -	$ -	$ -	$ 19,590,990
Load Optimization & PDR	$ -	$ 117,301	$ 107,421	$ 2,551,217	$ 4,373,545	$ -	$ 78,644	$ -	$ -	$ -	$ 7,228,129
Additional Utility Total	**$ -**	**$ 330,524**	**$ 1,281,304**	**$ 5,105,635**	**$ 22,923,176**	**$ 25,120**	**$ 350,608**	**$ -**	**$ -**	**$ -**	**$ 30,016,368**
Other Portfolio Costs	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 600,000**	**$ 250,000**	**$ 850,000**
Portfolio Total	**$ -**	**$ 4,089,000**	**$ 4,603,790**	**$ 71,924,465**	**$ 295,909,511**	**$ 2,743,545**	**$ 4,078,927**	**$ 3,112,200**	**$ 600,000**	**$ 250,000**	**$ 387,311,437**

Appendix B: Program Budgets and Costs by Program Year* (MFRs II.a.ix & II.a.x)											
Program Year 6 (PY2027)	**Capital Cost**	**Utility Administration**	**Marketing and Outreach**	**Outside Services**	**Incentives - Rebates and Loans**	**Inspections and QC**	**Evaluation**	**Health & Safety**	**Workforce Development**	**Outreach to Community-Based Organizations**	**Total Budget**
Whole Home	$ -	$ 362,443	$ 305,208	$ 7,687,552	$ 33,448,972	$ 356,323	$ 463,765	$ -	$ -	$ -	$ 42,624,264
Income Qualified	$ -	$ 750,380	$ 194,624	$ 1,175,859	$ 17,535,000	$ 235,040	$ 99,803	$ 3,156,300	$ -	$ -	$ 23,147,006
Energy Efficient Products	$ -	$ 212,488	$ 461,680	$ 4,848,603	$ 30,079,901	$ -	$ 391,629	$ -	$ -	$ -	$ 35,994,301
Behavioral	$ -	$ 113,101	$ 32,831	$ 2,525,970	$ -	$ -	$ 29,391	$ -	$ -	$ -	$ 2,701,292
Residential Total	**$ -**	**$ 1,438,412**	**$ 994,343**	**$ 16,237,984**	**$ 81,063,873**	**$ 591,363**	**$ 984,589**	**$ 3,156,300**	**$ -**	**$ -**	**$ 104,466,864**
Energy Solutions	$ -	$ 1,250,772	$ 1,213,069	$ 27,058,030	$ 83,197,740	$ 1,004,109	$ 1,250,961	$ -	$ -	$ -	$ 114,974,682
Prescriptive / Custom	$ -	$ 499,699	$ 721,551	$ 10,772,137	$ 65,684,411	$ 621,122	$ 861,288	$ -	$ -	$ -	$ 79,160,209
Direct Install	$ -	$ 600,559	$ 349,328	$ 13,022,769	$ 43,419,657	$ 522,624	$ 637,064	$ -	$ -	$ -	$ 58,552,002
Commercial & Industrial Total	**$ -**	**$ 2,351,031**	**$ 2,283,947**	**$ 50,852,937**	**$ 192,301,809**	**$ 2,147,855**	**$ 2,749,313**	**$ -**	**$ -**	**$ -**	**$ 252,686,893**
Multifamily	$ -	$ 20,539	$ 30,962	$ 485,200	$ 3,357,189	$ 16,399	$ 43,013	$ -	$ -	$ -	$ 3,953,302
Multifamily Total	**$ -**	**$ 20,539**	**$ 30,962**	**$ 485,200**	**$ 3,357,189**	**$ 16,399**	**$ 43,013**	**$ -**	**$ -**	**$ -**	**$ 3,953,302**
Next Generation Savings	$ -	$ 88,930	$ 775,814	$ 1,237,608	$ 975,000	$ -	$ 33,851	$ -	$ -	$ -	$ 3,111,203
CVR	$ -	$ 50,000	$ -	$ 15,000	$ -	$ -	$ 25,000	$ -	$ -	$ -	$ 90,000
Building Decarbonization	$ -	$ 74,858	$ 396,729	$ 1,309,911	$ 17,577,585	$ 25,130	$ 213,226	$ -	$ -	$ -	$ 19,597,440
Load Optimization & PDR	$ -	$ 171,230	$ 141,704	$ 3,733,208	$ 5,566,000	$ -	$ 105,734	$ -	$ -	$ -	$ 9,717,875
Additional Utility Total	**$ -**	**$ 385,018**	**$ 1,314,248**	**$ 6,295,727**	**$ 24,118,585**	**$ 25,130**	**$ 377,811**	**$ -**	**$ -**	**$ -**	**$ 32,516,519**
Other Portfolio Costs	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 600,000**	**$ 250,000**	**$ 850,000**
Portfolio Total	**$ -**	**$ 4,195,000**	**$ 4,623,500**	**$ 73,871,848**	**$ 300,841,456**	**$ 2,780,747**	**$ 4,154,726**	**$ 3,156,300**	**$ 600,000**	**$ 250,000**	**$ 394,473,577**

** Budgets include commitments for projects that may be paid in future years.*

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix C: Total Budget Summary, Including Annual Budget Summary and Joint Budgets with Partner Utilities (MFR II.b.iv)		
Program Year[3]	**Total Budget Summary**	**Lead Program Budget [1,2]**
2025	$ 182,368,746	$ 167,994,849
2026	$ 387,311,437	$ 353,748,857
2027	$ 394,473,577	$ 358,405,767
Portfolio Total	**$ 964,153,761**	**$ 880,149,472**

** Budgets include commitments for projects that may be paid in future years*

*** Total includes investment & administrative costs*

[1] *The Lead Program Budget includes only the budgets for coordinated programs in which costs are shared. Shared programs: Whole Home, Income Qualified, EE Products, Energy Solutions, Direct Install, Prescriptive & Custom, Multifamily*

[2] *Please refer to Section 5 of the plan for more information regarding the approach to budgeting; Per the budget adjustment mechanism described in Section 5 of this Program Plan, the utilities are providing the lead program budget which represents funding to be spent on joint projects.*

[3] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

Appendix D: Forecasted Average Cost to Achieve Each Unit of Energy Savings in Each Sector (MFR II.b.vi)				
Sector	Energy Efficiency Programs		Demand Response Program	Building Decarbonization Program
	Total $/ Lifetime kWh	Total $/ Lifetime Therms	Total $/ Lifetime kW	Total $/ Lifetime MMBtu
Residential	$ 0.21			
C&I	$ 0.08			
Multifamily	$ 0.06			
CVR	$ 0.004			
Building Decarbonization				$ 75
Demand Response			$ 203	

** Only include lead fuel budgets and savings.*

*** Cost to Achieve include health & safety costs; excludes financing principal, Next Generation Savings*

Appendix E: Benefit Cost Analysis (MFR II.b.v; MFR V.a through MFR V.e)

Cost Test		Total Residential Programs	Total Commercial & Industrial Programs	Total Multifamily	Total LMI	Total Portfolio	Whole Home	Income Qualified	Energy Efficient Products	Behavioral	Energy Solutions	Prescriptive/ Custom	Direct Install	Multifamily	Next Generation Savings	CVR	Building Decarbonization	Demand Response	Other Portfolio
Total Resource Costs Tests (TRC)																			
Lifetime Avoided Wholesale Electric Energy and Ancillary Costs		$ 33,913,681	$ 196,716,218	$ 2,484,444	$ 3,137,196	$ 236,251,538	$ 15,162,676	$ 3,137,196	$ 14,760,027	$ 3,990,978	$ 79,953,364	$ 58,228,985	$ 58,533,868	$ 2,484,444	$ -	$ 2,133,417	$ (4,413,028)	$ -	$ -
Lifetime Avoided Wholesale Electric Capacity Costs		$ 4,369,130	$ 24,259,531	$ 324,280	$ 154,487	$ 29,107,429	$ 732,530	$ 154,487	$ 3,281,660	$ 354,939	$ 10,713,038	$ 6,368,254	$ 7,178,239	$ 324,280	$ -	$ 165,221	$ (735,485)	$ 2,518,786	$ -
Lifetime Avoided Wholesale Natural Gas and Delivered Fuels Costs		$ 13,694,036	$ 66,047,567	$ 4,595,569	$ 5,024,246	$ 89,361,419	$ 8,155,839	$ 5,024,246	$ 5,538,197	$ -	$ 19,627,861	$ (7,008,939)	$ 53,428,645	$ 4,595,569	$ -	$ -	$ 5,535,489	$ -	$ -
Lifetime DRIPE Benefits (E&G)		$ 2,598,842	$ 14,351,166	$ 370,215	$ 415,796	$ 17,736,019	$ 1,202,552	$ 415,796	$ 1,178,994	$ 217,296	$ 5,514,713	$ 2,879,415	$ 5,957,038	$ 370,215	$ -	$ 114,932	$ 19,349	$ 125,939	$ -
Lifetime Avoided RPS REC Purchase Costs		$ 3,736,046	$ 18,943,941	$ 199,754	$ 239,028	$ 23,118,769	$ 1,391,955	$ 239,028	$ 1,531,855	$ 812,235	$ 7,372,162	$ 6,632,128	$ 4,939,652	$ 199,754	$ -	$ 504,045	$ (403,271)	$ -	$ -
Lifetime Avoided Wholesale Volatility Costs (E&G)		$ 5,197,685	$ 28,702,332	$ 740,429	$ 831,593	$ 35,472,039	$ 2,405,105	$ 831,593	$ 2,357,988	$ 434,592	$ 11,029,426	$ 5,758,830	$ 11,914,075	$ 740,429	$ -	$ 229,864	$ 38,698	$ 251,879	$ -
Lifetime Avoided T&D Costs (E&G)		$ 4,782,565	$ 25,047,083	$ 319,432	$ 198,669	$ 30,347,750	$ 927,254	$ 198,669	$ 3,435,943	$ 419,368	$ 11,102,679	$ 6,593,993	$ 7,350,411	$ 319,432	$ -	$ 218,524	$ (639,573)	$ 2,586,597	$ -
	Total Benefit	**$ 68,291,986**	**$ 374,067,838**	**$ 9,034,122**	**$ 10,001,016**	**$ 461,394,962**	**$ 29,977,911**	**$ 10,001,016**	**$ 32,084,666**	**$ 6,229,408**	**$ 145,313,244**	**$ 79,452,667**	**$ 149,301,927**	**$ 9,034,122**	**$ -**	**$ 3,366,003**	**$ (597,821)**	**$ 5,483,201**	**$ -**
Lifetime Incremental Costs		$ 78,844,458	$ 149,517,391	$ 14,408,360	#########	$ 264,473,114	$ 48,044,848	$ 21,702,904	$ 30,799,610	$ -	$ 52,121,073	$ 69,570,135	$ 27,826,183	$ 14,408,360	$ -	$ -	$ 1,945,791	$ -	$ -
Lifetime Administration Costs		$ 40,431,928	$ 134,526,607	$ 1,418,602	$ 5,593,286	$ 181,970,423	$ 20,580,163	$ 5,593,286	$ 13,737,396	$ 6,114,369	$ 70,826,249	$ 30,798,380	$ 32,901,978	$ 1,418,602	$ 4,836,624	$ 204,717	$ 4,690,154	$ 7,710,432	$ 1,910,516
	Total Costs	**$ 119,276,386**	**$ 284,043,998**	**$ 15,826,962**	**$ 27,296,190**	**$ 446,443,537**	**$ 68,625,011**	**$ 27,296,190**	**$ 44,537,006**	**$ 6,114,369**	**$ 122,947,322**	**$ 100,368,515**	**$ 60,728,161**	**$ 15,826,962**	**$ 4,836,624**	**$ 204,717**	**$ 6,636,945**	**$ 7,710,432**	**$ 1,910,516**
	Benefit-Cost Ratio	***0.6***	***1.3***	***0.6***	***0.4***	***1.0***	***0.4***	***0.4***	***0.7***	***1.0***	***1.2***	***0.8***	***2.5***	***0.6***	***0.0***	***16.4***	***-0.1***	***0.7***	***0.0***
Participant Cost Test (PCT)																			
Lifetime Avoided Retail Electric Costs		$ 121,542,218	$ 543,737,332	$ 9,333,222	########	$ 685,865,805	$ 53,895,467	$ 11,253,033	$ 54,164,730	$ 13,482,021	$ 189,607,720	$ 196,449,910	$ 157,679,701	$ 9,333,222	$ -	$ -	$ -	$ 6,843,857	$ -
Lifetime Avoided Retail Natural Gas and Delivered Fuel Costs		$ 25,573,434	$ 164,233,431	$ 9,024,673	$ 9,073,352	$ 207,904,889	$ 14,789,364	$ 9,073,352	$ 10,784,070	$ -	$ 91,866,468	$ (28,732,849)	$ 101,099,812	$ 9,024,673	$ -	$ -	$ -	$ -	$ -
Lifetime Program Incentive Costs		$ 103,380,002	$ 306,034,262	$ 3,306,020	########	$ 458,102,363	$ 66,942,158	$ 45,382,080	$ 36,437,844	$ -	$ 129,706,888	$ 97,264,925	$ 79,062,448	$ 3,306,020	$ 2,191,474	$ -	$ 33,564,802	$ 11,895,565	$ -
Lifetime Time-Value of Loan Repayments		$ 5,801,097	$ 17,263,600	$ 619,144	$ -	$ 23,683,841	$ 975,947	$ -	$ 4,825,150	$ -	$ 7,665,349	$ 7,530,856	$ 2,067,395	$ 619,144	$ -	$ -	$ 320,436	$ -	$ -
	Total Benefit	**$ 256,296,751**	**$ 1,031,268,625**	**$ 22,283,058**	**$ 65,708,464**	**$ 1,375,556,898**	**$ 136,602,937**	**$ 65,708,464**	**$ 106,211,793**	**$ 13,482,021**	**$ 418,846,426**	**$ 272,512,843**	**$ 339,909,356**	**$ 22,283,058**	**$ 2,191,474**	**$ -**	**$ 33,885,238**	**$ 18,739,422**	**$ -**
Lifetime Participant Costs		$ 78,844,458	$ 149,517,391	$ 14,408,360	#########	$ 264,473,114	$ 48,044,848	$ 21,702,904	$ 30,799,610	$ -	$ 52,121,073	$ 69,570,135	$ 27,826,183	$ 14,408,360	$ -	$ -	$ 1,945,791	$ -	$ -
	Total Costs	**$ 78,844,458**	**$ 149,517,391**	**$ 14,408,360**	**$ 21,702,904**	**$ 264,473,114**	**$ 48,044,848**	**$ 21,702,904**	**$ 30,799,610**	**$ -**	**$ 52,121,073**	**$ 69,570,135**	**$ 27,826,183**	**$ 14,408,360**	**$ -**	**$ -**	**$ 1,945,791**	**$ -**	**$ -**
	Benefit-Cost Ratio	***3.3***	***6.9***	***1.5***	***3.0***	***5.2***	***2.8***	***3.0***	***3.4***	***-***	***8.0***	***3.9***	***12.2***	***1.5***	***-***	***-***	***17.4***	***-***	***-***
Program Administrator Cost Test (PAC)																			
Lifetime Avoided Wholesale Electric Energy and Ancillary Costs		$ 33,913,681	$ 196,716,218	$ 2,484,444	$ 3,137,196	$ 236,251,538	$ 15,162,676	$ 3,137,196	$ 14,760,027	$ 3,990,978	$ 79,953,364	$ 58,228,985	$ 58,533,868	$ 2,484,444	$ -	$ 2,133,417	$ (4,413,028)	$ -	$ -
Lifetime Avoided Wholesale Electric Capacity Costs		$ 4,369,130	$ 24,259,531	$ 324,280	$ 154,487	$ 29,107,429	$ 732,530	$ 154,487	$ 3,281,660	$ 354,939	$ 10,713,038	$ 6,368,254	$ 7,178,239	$ 324,280	$ -	$ 165,221	$ (735,485)	$ 2,518,786	$ -
Lifetime Avoided Wholesale Natural Gas and Delivered Fuels Costs		$ 13,694,036	$ 66,047,567	$ 4,595,569	$ 5,024,246	$ 89,361,419	$ 8,155,839	$ 5,024,246	$ 5,538,197	$ -	$ 19,627,861	$ (7,008,939)	$ 53,428,645	$ 4,595,569	$ -	$ -	$ 5,535,489	$ -	$ -
Lifetime DRIPE Benefits (E&G)		$ 2,598,842	$ 14,351,166	$ 370,215	$ 415,796	$ 17,736,019	$ 1,202,552	$ 415,796	$ 1,178,994	$ 217,296	$ 5,514,713	$ 2,879,415	$ 5,957,038	$ 370,215	$ -	$ 114,932	$ 19,349	$ 125,939	$ -
Lifetime Avoided RPS REC Purchase Costs		$ 3,736,046	$ 18,943,941	$ 199,754	$ 239,028	$ 23,118,769	$ 1,391,955	$ 239,028	$ 1,531,855	$ 812,235	$ 7,372,162	$ 6,632,128	$ 4,939,652	$ 199,754	$ -	$ 504,045	$ (403,271)	$ -	$ -
Lifetime Avoided Wholesale Volatility Costs		$ 5,197,685	$ 28,702,332	$ 740,429	$ 831,593	$ 35,472,039	$ 2,405,105	$ 831,593	$ 2,357,988	$ 434,592	$ 11,029,426	$ 5,758,830	$ 11,914,075	$ 740,429	$ -	$ 229,864	$ 38,698	$ 251,879	$ -
Lifetime Avoided T&D Costs		$ 4,782,565	$ 25,047,083	$ 319,432	$ 198,669	$ 30,347,750	$ 927,254	$ 198,669	$ 3,435,943	$ 419,368	$ 11,102,679	$ 6,593,993	$ 7,350,411	$ 319,432	$ -	$ 218,524	$ (639,573)	$ 2,586,597	$ -
	Total Benefit	**$ 68,291,986**	**$ 374,067,838**	**$ 9,034,122**	**$ 10,001,016**	**$ 461,394,962**	**$ 29,977,911**	**$ 10,001,016**	**$ 32,084,666**	**$ 6,229,408**	**$ 145,313,244**	**$ 79,452,667**	**$ 149,301,927**	**$ 9,034,122**	**$ -**	**$ 3,366,003**	**$ (597,821)**	**$ 5,483,201**	**$ -**
Lifetime Administration Costs		$ 40,431,928	$ 134,526,607	$ 1,418,602	$ 5,593,286	$ 181,970,423	$ 20,580,163	$ 5,593,286	$ 13,737,396	$ 6,114,369	$ 70,826,249	$ 30,798,380	$ 32,901,978	$ 1,418,602	$ 4,836,624	$ 204,717	$ 4,690,154	$ 7,710,432	$ 1,910,516
Lifetime Program Investment Costs		$ 103,380,002	$ 306,034,262	$ 3,306,020	#########	$ 458,102,363	$ 66,942,158	$ 45,382,080	$ 36,437,844	$ -	$ 129,706,888	$ 97,264,925	$ 79,062,448	$ 3,306,020	$ 2,191,474	$ -	$ 33,564,802	$ 11,895,565	$ -
Lifetime Time-Value of Loan Repayments		$ 5,801,097	$ 17,263,600	$ 619,144	$ -	$ 23,683,841	$ 975,947	$ -	$ 4,825,150	$ -	$ 7,665,349	$ 7,530,856	$ 2,067,395	$ 619,144	$ -	$ -	$ 320,436	$ -	$ -
	Total Costs	**$ 149,613,027**	**$ 457,824,468**	**$ 5,343,765**	**$ 50,975,366**	**$ 663,756,626**	**$ 88,498,268**	**$ 50,975,366**	**$ 55,000,389**	**$ 6,114,369**	**$ 208,198,487**	**$ 135,594,161**	**$ 114,031,821**	**$ 5,343,765**	**$ 7,028,099**	**$ 204,717**	**$ 38,575,392**	**$ 19,605,997**	**$ 1,910,516**
	Benefit-Cost Ratio	***0.5***	***0.8***	***1.7***	***0.2***	***0.7***	***0.3***	***0.2***	***0.6***	***1.0***	***0.7***	***0.6***	***1.3***	***1.7***	***0.0***	***16.4***	***0.0***	***0.3***	***0.0***
Ratepayer Impact Measure Test (RIM)																			
Lifetime Avoided Wholesale Electric Energy and Ancillary Costs		$ 33,913,681	$ 196,716,218	$ 2,484,444	$ 3,137,196	$ 236,251,538	$ 15,162,676	$ 3,137,196	$ 14,760,027	$ 3,990,978	$ 79,953,364	$ 58,228,985	$ 58,533,868	$ 2,484,444	$ -	$ 2,133,417	$ (4,413,028)	$ -	$ -
Lifetime Avoided Wholesale Electric Capacity Costs		$ 4,369,130	$ 24,259,531	$ 324,280	$ 154,487	$ 29,107,429	$ 732,530	$ 154,487	$ 3,281,660	$ 354,939	$ 10,713,038	$ 6,368,254	$ 7,178,239	$ 324,280	$ -	$ 165,221	$ (735,485)	$ 2,518,786	$ -
Lifetime Avoided Wholesale Natural Gas Costs		$ 13,694,036	$ 66,047,567	$ 4,595,569	$ 5,024,246	$ 89,361,419	$ 8,155,839	$ 5,024,246	$ 5,538,197	$ -	$ 19,627,861	$ (7,008,939)	$ 53,428,645	$ 4,595,569	$ -	$ -	$ 5,535,489	$ -	$ -
Lifetime DRIPE Benefits (E&G)		$ 2,598,842	$ 14,351,166	$ 370,215	$ 415,796	$ 17,736,019	$ 1,202,552	$ 415,796	$ 1,178,994	$ 217,296	$ 5,514,713	$ 2,879,415	$ 5,957,038	$ 370,215	$ -	$ 114,932	$ 19,349	$ 125,939	$ -
Lifetime Avoided RPS REC Purchase Costs		$ 3,736,046	$ 18,943,941	$ 199,754	$ 239,028	$ 23,118,769	$ 1,391,955	$ 239,028	$ 1,531,855	$ 812,235	$ 7,372,162	$ 6,632,128	$ 4,939,652	$ 199,754	$ -	$ 504,045	$ (403,271)	$ -	$ -
Lifetime Avoided Wholesale Volatility Costs		$ 5,197,685	$ 28,702,332	$ 740,429	$ 831,593	$ 35,472,039	$ 2,405,105	$ 831,593	$ 2,357,988	$ 434,592	$ 11,029,426	$ 5,758,830	$ 11,914,075	$ 740,429	$ -	$ 229,864	$ 38,698	$ 251,879	$ -
Lifetime Avoided T&D Costs		$ 4,782,565	$ 25,047,083	$ 319,432	$ 198,669	$ 30,347,750	$ 927,254	$ 198,669	$ 3,435,943	$ 419,368	$ 11,102,679	$ 6,593,993	$ 7,350,411	$ 319,432	$ -	$ 218,524	$ (639,573)	$ 2,586,597	$ -
	Total Benefit	**$ 68,291,986**	**$ 374,067,838**	**$ 9,034,122**	**$ 10,001,016**	**$ 461,394,962**	**$ 29,977,911**	**$ 10,001,016**	**$ 32,084,666**	**$ 6,229,408**	**$ 145,313,244**	**$ 79,452,667**	**$ 149,301,927**	**$ 9,034,122**	**$ -**	**$ 3,366,003**	**$ (597,821)**	**$ 5,483,201**	**$ -**
Lifetime Administration Costs		$ 40,431,928	$ 134,526,607	$ 1,418,602	$ 5,593,286	$ 181,970,423	$ 20,580,163	$ 5,593,286	$ 13,737,396	$ 6,114,369	$ 70,826,249	$ 30,798,380	$ 32,901,978	$ 1,418,602	$ 4,836,624	$ 204,717	$ 4,690,154	$ 7,710,432	$ 1,910,516
Lifetime Program Investment Costs		$ 103,380,002	$ 306,034,262	$ 3,306,020	#########	$ 458,102,363	$ 66,942,158	$ 45,382,080	$ 36,437,844	$ -	$ 129,706,888	$ 97,264,925	$ 79,062,448	$ 3,306,020	$ 2,191,474	$ -	$ 33,564,802	$ 11,895,565	$ -
Lifetime Re-allocated Distribution Costs		$ 49,707,984	$ 190,639,506	$ 7,673,002	$ 8,180,431	$ 256,200,924	$ 23,385,096	$ 8,180,431	$ 22,702,312	$ 3,620,576	$ 53,931,107	$ 47,890,096	$ 88,818,303	$ 7,673,002	$ -	$ -	$ -	$ 6,164,731	$ -
Lifetime Time-Value of Loan Repayments		$ 5,801,097	$ 17,263,600	$ 619,144	$ -	$ 23,683,841	$ 975,947	$ -	$ 4,825,150	$ -	$ 7,665,349	$ 7,530,856	$ 2,067,395	$ 619,144	$ -	$ -	$ 320,436	$ -	$ -
	Total Costs	**$ 199,321,011**	**$ 648,463,974**	**$ 13,016,768**	**$ 59,155,797**	**$ 919,957,550**	**$ 111,883,364**	**$ 59,155,797**	**$ 77,702,701**	**$ 9,734,946**	**$ 262,129,594**	**$ 183,484,257**	**$ 202,880,123**	**$ 13,016,768**	**$ 7,028,099**	**$ 204,717**	**$ 38,575,392**	**$ 25,770,729**	**$ 1,910,516**
	Benefit-Cost Ratio	***0.3***	***0.6***	***0.7***	***0.2***	***0.5***	***0.3***	***0.2***	***0.4***	***0.6***	***0.6***	***0.4***	***0.7***	***0.7***	***0.0***	***16.4***	***0.0***	***0.2***	***0.0***
Societal Cost Test (SCT)																			
Lifetime Avoided Wholesale Electric Energy and Ancillary Costs		$ 37,634,105	$ 221,850,967	$ 2,890,828	$ 3,678,865	$ 266,054,765	$ 17,105,290	$ 3,678,865	$ 16,388,849	$ 4,139,965	$ 90,807,245	$ 63,907,845	$ 67,135,878	$ 2,890,828	$ -	$ 2,208,459	$ (5,067,009)	$ -	$ -
Lifetime Avoided Wholesale Electric Capacity Costs		$ 4,912,714	$ 28,103,078	$ 387,211	$ 185,468	$ 33,588,471	$ 858,776	$ 185,468	$ 3,676,851	$ 377,087	$ 12,470,964	$ 7,202,929	$ 8,429,185	$ 387,211	$ -	$ 175,105	$ (863,679)	$ 2,666,449	$ -
Lifetime Avoided Wholesale Natural Gas and Delivered Fuels Costs		$ 15,363,918	$ 77,429,275	$ 5,400,385	$ 5,933,720	$ 104,127,297	$ 9,600,362	$ 5,933,720	$ 5,763,555	$ -	$ 23,391,135	$ (7,585,801)	$ 61,623,942	$ 5,400,385	$ -	$ -	$ 6,390,049	$ -	$ -
Lifetime DRIPE Benefits (E&G)		$ 2,895,537	$ 16,369,166	$ 433,921	$ 489,903	$ 20,188,527	$ 1,378,221	$ 489,903	$ 1,291,463	$ 225,853	$ 6,333,467	$ 3,176,249	$ 6,859,450	$ 433,921	$ -	$ 119,178	$ 22,968	$ 133,322	$ -
Lifetime Avoided RPS REC Purchase Costs		$ 3,991,338	$ 20,529,476	$ 221,052	$ 265,640	$ 25,007,505	$ 1,507,710	$ 265,640	$ 1,642,679	$ 840,950	$ 8,032,890	$ 7,074,777	$ 5,421,808	$ 221,052	$ -	$ 520,544	$ (443,065)	$ -	$ -
Lifetime Avoided Wholesale Volatility Costs		$ 5,791,074	$ 32,738,332	$ 867,842	$ 979,805	$ 40,377,053	$ 2,756,443	$ 979,805	$ 2,582,926	$ 451,705	$ 12,666,934	$ 6,352,497	$ 13,718,900	$ 867,842	$ -	$ 238,356	$ 45,936	$ 266,645	$ -
Lifetime Avoided T&D Costs		$ 5,269,268	$ 28,444,841	$ 374,406	$ 234,097	$ 34,322,611	$ 1,066,315	$ 234,097	$ 3,767,631	$ 435,322	$ 12,680,945	$ 7,298,597	$ 8,465,299	$ 374,406	$ -	$ 226,297	$ (737,459)	$ 2,678,228	$ -
Lifetime Avoided Emissions Damages		$ 60,179,854	$ 354,680,975	$ 10,188,855	#########	$ 436,161,043	$ 30,637,601	$ 11,111,359	$ 25,065,767	$ 4,476,486	$ 133,258,401	$ 62,974,334	$ 158,448,241	$ 10,188,855	$ -	$ 2,386,019	$ 2,041,400	$ -	$ -
Job and Savings Multiplier Benefits		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Non-Energy Benefit Adder		$ 4,996,670	$ 26,326,663	$ 1,094,641	$ 1,185,475	$ 33,603,449	$ 2,446,358	$ 1,185,475	$ 2,257,238	$ 293,074	$ 9,465,806	$ 2,447,448	$ 14,413,410	$ 1,094,641	$ -	$ 165,656	$ 791,764	$ 461,729	$ -
Low-Income Adder		$ -	$ -	$ -	$ 1,185,475	$ 1,185,475	$ -	$ 1,185,475	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	Total Benefit	**$ 141,034,477**	**$ 806,472,773**	**$ 21,859,142**	**$ 25,249,805**	**$ 994,616,196**	**$ 67,357,077**	**$ 25,249,805**	**$ 62,436,957**	**$ 11,240,442**	**$ 309,107,786**	**$ 152,848,874**	**$ 344,516,112**	**$ 21,859,142**	**$ -**	**$ 6,039,614**	**$ 2,180,905**	**$ 6,206,374**	**$ -**
Lifetime Incremental Costs		$ 80,929,207	$ 153,500,228	$ 14,797,098	#########	$ 271,514,091	$ 49,325,808	$ 22,287,558	$ 31,603,399	$ -	$ 53,550,936	$ 71,357,502	$ 28,591,790	$ 14,797,098	$ -	$ -	$ 2,001,780	$ -	$ -
Lifetime Administration Costs		$ 41,496,094	$ 138,115,886	$ 1,454,756	$ 5,740,462	$ 186,807,197	$ 21,126,922	$ 5,740,462	$ 14,093,128	$ 6,276,045	$ 72,714,588	$ 31,604,939	$ 33,796,359	$ 1,454,756	$ 4,964,489	$ 210,114	$ 4,811,920	$ 7,927,213	$ 1,961,314
	Total Costs	**$ 122,425,301**	**$ 291,616,114**	**$ 16,251,854**	**$ 28,028,019**	**$ 458,321,289**	**$ 70,452,729**	**$ 28,028,019**	**$ 45,696,527**	**$ 6,276,045**	**$ 126,265,524**	**$ 102,962,441**	**$ 62,388,149**	**$ 16,251,854**	**$ 4,964,489**	**$ 210,114**	**$ 6,813,700**	**$ 7,927,213**	**$ 1,961,314**
	Benefit-Cost Ratio	***1.2***	***2.8***	***1.3***	***0.9***	***2.2***	***1.0***	***0.9***	***1.4***	***1.8***	***2.4***	***1.5***	***5.5***	***1.3***	***0.0***	***28.7***	***0.3***	***0.8***	***0.0***
New Jersey Cost Test (NJCT)																			
Lifetime Avoided Wholesale Electric Energy and Ancillary Costs		$ 37,634,105	$ 221,850,967	$ 2,890,828	$ 3,678,865	$ 266,054,765	$ 17,105,290	$ 3,678,865	$ 16,388,849	$ 4,139,965	$ 90,807,245	$ 63,907,845	$ 67,135,878	$ 2,890,828	$ -	$ 2,208,459	$ (5,067,009)	$ -	$ -
Lifetime Avoided Wholesale Electric Capacity Costs		$ 4,912,714	$ 28,103,078	$ 387,211	$ 185,468	$ 33,588,471	$ 858,776	$ 185,468	$ 3,676,851	$ 377,087	$ 12,470,964	$ 7,202,929	$ 8,429,185	$ 387,211	$ -	$ 175,105	$ (863,679)	$ 2,666,449	$ -
Lifetime Avoided Wholesale Natural Gas Costs		$ 15,363,918	$ 77,429,275	$ 5,400,385	$ 5,933,720	$ 104,127,297	$ 9,600,362	$ 5,933,720	$ 5,763,555	$ -	$ 23,391,135	$ (7,585,801)	$ 61,623,942	$ 5,400,385	$ -	$ -	$ 6,390,049	$ -	$ -
Lifetime DRIPE Benefits (E&G)		$ 2,895,537	$ 16,369,166	$ 433,921	$ 489,903	$ 20,188,527	$ 1,378,221	$ 489,903	$ 1,291,463	$ 225,853	$ 6,333,467	$ 3,176,249	$ 6,859,450	$ 433,921	$ -	$ 119,178	$ 22,968	$ 133,322	$ -
Lifetime Avoided Electric Transmission Costs		$ 5,269,268	$ 28,444,841	$ 374,406	$ 234,097	$ 34,322,611	$ 1,066,315	$ 234,097	$ 3,767,631	$ 435,322	$ 12,680,945	$ 7,298,597	$ 8,465,299	$ 374,406	$ -	$ 226,297	(737,459)	$ 2,678,228	$ -
Lifetime Avoided Distribution Costs		$ 39,575,847	$ 138,989,505	$ 3,244,468	$ 3,797,678	$ 185,607,498	$ 17,309,824	$ 3,797,678	$ 18,509,557	$ 3,756,466	$ 40,025,005	$ 60,065,932	$ 38,898,568	$ 3,244,468	$ -	$ -	$ -	$ 6,381,889	$ -
Lifetime Avoided Emissions Damages		$ 60,179,854	$ 354,680,975	$ 10,188,855	#########	$ 436,161,043	$ 30,637,601	$ 11,111,359	$ 25,065,767	$ 4,476,486	$ 133,258,401	$ 62,974,334	$ 158,448,241	$ 10,188,855	$ -	$ 2,386,019	$ 2,041,400	$ -	$ -
Non-Energy Benefit Adder		$ 9,911,331	$ 55,829,599	$ 1,423,013	$ 1,578,308	$ 68,742,251	$ 4,501,345	$ 1,578,308	$ 4,633,252	$ 776,734	$ 21,852,563	$ 11,099,973	$ 22,877,063	$ 1,423,013	$ -	$ 409,356	(38,270)	$ 821,700	$ -
Low-Income Adder		$ -	$ -	$ -	$ 1,578,308	$ 1,578,308	$ -	$ 1,578,308	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	Total Benefit	**$ 175,742,573**	**$ 921,697,406**	**$ 24,343,087**	**$ 28,587,705**	**$ 1,150,370,771**	**$ 82,457,736**	**$ 28,587,705**	**$ 79,096,925**	**$ 14,187,913**	**$ 340,819,724**	**$ 208,140,056**	**$ 372,737,625**	**$ 24,343,087**	**$ -**	**$ 5,524,413**	**$ 1,748,000**	**$ 12,681,588**	**$ -**
Lifetime Incremental Costs		$ 80,929,207	$ 153,500,228	$ 14,797,098	#########	$ 271,514,091	$ 49,325,808	$ 22,287,558	$ 31,603,399	$ -	$ 53,550,936	$ 71,357,502	$ 28,591,790	$ 14,797,098	$ -	$ -	$ 2,001,780	$ -	$ -
Lifetime Administration Costs		$ 41,496,094	$ 138,115,886	$ 1,454,756	$ 5,740,462	$ 186,807,197	$ 21,126,922	$ 5,740,462	$ 14,093,128	$ 6,276,045	$ 72,714,588	$ 31,604,939	$ 33,796,359	$ 1,454,756	$ 4,964,489	$ 210,114	$ 4,811,920	$ 7,927,213	$ 1,961,314
	Total Costs	**$ 122,425,301**	**$ 291,616,114**	**$ 16,251,854**	**$ 28,028,019**	**$ 458,321,289**	**$ 70,452,729**	**$ 28,028,019**	**$ 45,696,527**	**$ 6,276,045**	**$ 126,265,524**	**$ 102,962,441**	**$ 62,388,149**	**$ 16,251,854**	**$ 4,964,489**	**$ 210,114**	**$ 6,813,700**	**$ 7,927,213**	**$ 1,961,314**
	Benefit-Cost Ratio	***1.4***	***3.2***	***1.5***	***1.0***	***2.5***	***1.2***	***1.0***	***1.7***	***2.3***	***2.7***	***2.0***	***6.0***	***1.5***	***0.0***	***26.3***	***0.3***	***1.6***	***0.0***

Appendix F: Quantitative Performance Indicators by Program Year (MFR VII.a & MFR VII.b)							
	Net Annual Energy Savings (Source MMBtu)	Net Annual Demand Savings (Peak MW)	Net Annual Demand Savings (Peak-day therm)	Net Lifetime Energy Savings (Source MMBtu)	LMI and OBC Net Lifetime Energy Savings (Source MMBtu)	Small Business Net Lifetime Energy Savings (Source MMBtu)	Cost to Achieve ($/ Lifetime Source MMBtu)
2025	1,047,450	29.25	-	9,532,474	157,121	2,404,129	$ 18
2026	2,407,855	66.40	-	24,979,320	554,764	5,943,096	$ 14
2027	2,369,158	67.33	-	24,765,655	560,031	5,942,175	$ 15
Portfolio Total	**5,824,464**	**162.99**	**-**	**59,277,449**	**1,271,915**	**14,289,401**	**$ 15**

**QPIs based only on lead fuel and include only energy efficiency*

**Legacy savings included in QPI savings, but legacy costs not included because they are accounted for in prior Triennia*

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix G: Table G-1: Building Decarbonization Metrics (BD MFRs VII.a. & VII.b.)																				
	Site and source energy savings by fuel (MMBtu)					Site and source lifetime energy savings by fuel (MMBtu)					Site and source annual emissions by fuel (CO2e MT)					Site and source lifetime emissions by fuel (CO2e MT)				
Program Year	Electric		Natural Gas	Fuel Oil	Propane	Electric		Natural Gas	Fuel Oil	Propane	Electric		Natural Gas	Fuel Oil	Propane	Electric		Natural Gas	Fuel Oil	Propane
	Site	Source	Site		Source	Site	Source	Site		Source	Site	Source	Site		Source	Site	Source	Site		Source
2025	(4,113)	(10,177)	13,639		13,837	(61,065)	(140,123)	201,293		204,214	(579)	(643)	722		732	(7,569)	(8,414)	10,651		10,805
2026	(15,806)	(38,709)	52,507		53,269	(234,609)	(531,959)	774,420		785,655	(2,224)	(2,471)	2,778		2,819	(29,080)	(32,327)	40,976		41,570
2027	(15,188)	(36,806)	50,554		51,288	(225,321)	(505,498)	745,031		755,839	(2,092)	(2,325)	2,675		2,714	(27,930)	(31,047)	39,421		39,993
2027 and Beyond	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-
Total	**(35,106)**	**(85,692)**	**116,700**		**118,393**	**(520,995)**	**(1,177,580)**	**1,720,744**		**1,745,708**	**(4,894)**	**(5,440)**	**6,175**		**6,264**	**(64,579)**	**(71,788)**	**91,047**		**92,368**

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix G: Table G-1 Cont'd: Building Decarbonization Metrics (BD MFRs VII.a. & VII.b.)																	
	Net annual peak demand savings by fuel (electricity and natural gas only) (peak MW or peak-day therm)				CO2 emissions impacts by fuel (CO2e MT)				Net CO2 emissions impacts across fuels (CO2e MT)	Levelized cost per metric ton of CO2e (costs levelized over the EUL or AUL, as appropriate, of the measure or project divided by lifetime net CO2e impacts)	Number of distributors and contractors engaged in the program	Number of program participants and installations, overall and for LMI				Number and geographic location of installations	
Program Year	Electric	Natural Gas	Fuel Oil	Propane	Electric	Natural Gas	Fuel Oil	Propane	All Fuels (sum of prior 4 columns)			Program Participants		Installations		Number of Installations	Geographic Location of Installations
												Overall	LMI Customers	Overall	LMI Customers		
2025	(299.98)	-	-	-	(643)		732		89	$ 557	-	634	-	634	-	-	-
2026	(1,153.37)	-	-	-	(2,471)		2,819		347	$ 471	-	2,512	-	2,512	-	-	-
2027	(1,109.16)	-	-	-	(2,325)		2,714		388	$ 490	-	2,513	-	2,513	-	-	-
2027 and Beyond	-	-	-	-	-		-		-	-	-	-	-	-	-	-	-
Total	(2,562.51)	-	-	-	(5,440)		6,264		825	1,518	-	5,659	-	5,659	-	-	-

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix G: Table G-2: Demand Response Metrics								
	Dollars spent per customer enrolled per $ spent ($/participant) by segment for each proposed program		Dollars spent per capacity enrolled ($/kW) by each segment for each proposed program		Intensity impact (kWh or CO2 during peak event) for each proposed program[2]		Ratio of number of customer responses to control requests over number of control requests[3]	
Program Year[1]	Residential	Commercial & Industrial	Residential	Commercial & Industrial	Residential	Commercial & Industrial	Residential	Commercial & Industrial
2025	$ 181	$ 181	$ 244	$ 273	38,152	3,052	60%	60%
2026	$ 37	$ 180	$ 225	$ 239	50,582	4,578	60%	60%
2027	$ 26	$ 179	$ 203	$ 224	64,096	6,104	60%	60%
Total	**$ 37**	**$ 180**	**$ 219**	**$ 240**	**152,831**	**13,735**	**60%**	**60%**

[1] *Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order*

[2] *kWh based on average demand reduction per device per event and an average of 3 hour event duration, excluding Behavioral DR*

[3] *Based on average minutes under control per device*

Appendix H: Residential Sector Prescriptive Incentives (not including repayment plans)					
Program	**Measure [1]**	**Rebate Up To Value ($) GDC/EDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up To Value ($)**	**Existing Up To Value ($) Rebate Strategy**
Efficient Products - Electric	LED Fixtures	$20	Per unit	Same	$10
	Occupancy Sensors	$80	Per unit	Same	$7
	LED Holiday Lights	$5	Per unit	Same	$5
	Ceiling Fans	$35	Per unit	Same	$35
	LED Table/Desk Lamps	$15	Per unit	Same	$15
	Clothes Washer	$200	Per unit	Same	$100
	Electric Clothes Dryer	$500	Per unit	Same	$300
	Refrigerator	$125	Per unit	Same	$100
	Freezers	$100	Per unit	Same	$75
	Dishwasher	$100	Per unit	Same	$25
	Induction Cooktop Stove	$150	Per unit	Same	$25
	Air Purifier / Cleaner	$75	Per unit	Same	$50
	Room A/C Unit	$60	Per unit	Same	$30
	Dehumidifier	$50	Per unit	Same	$35
	Heat Pump Water Heater	$2,500	Per unit	Up to a 50% incentive adder	$1,000
	Smart Thermostats [3]	$150	Per unit	Same	$125
	Pool Pump	$500	Per unit	Same	$500
	Sound Bars	$25	Per unit	Same	$20
	Water Cooler	$30	Per unit	Same	$25
	Electric Vehicle Charger	$80	Per unit	Same	$50
	Monitors	$25	Per unit	Same	$25
	Computers	$25	Per unit	Same	$25
	Imaging	$30	Per unit	Same	$25
	Smart Strip Plug Outlets	$80	Per unit	Same	$40
	TVs	$150	Per unit	Same	$50
	Smart Home	Up to full incremental cost	Per unit	Same	$10
	Refrigerator Recycling	$175	Per unit	Same	$100
	Freezer Recycling	$175	Per unit	Same	$100
	Room A/C Unit Recycling	$50	Per unit	Same	$35
	Dehumidifier Recycling	$175	Per unit	Same	$35
	EE Kits	$75	Per unit	Same	$60
	Central Air Conditioning	$1,000	Per unit	Up to 100% incentive adder	$500
	Air Source Heat Pump	$3,500	Per unit	Up to 50% adder	$1,000
	Geothermal Heat Pump	$10,000	Per unit	Up to 50% adder	$1,500
	Air-to-Water Heat Pumps	$1600 per 10,000 BTUh	Per 10,000 BTUh	Up to 50% adder	New
	Ductless Mini-Split Heat Pump	$3,500	Per unit	Up to 50% adder	$400
	Ductless Mini Split A/C	$500	Per unit	up to $5,000 per 10,000 BTUh	$500
	Furnace Fans (ECM)	$125	Per unit	up to $750	$100
	PTAC - CEE Tier 2 - Multi Family	$75	Per unit	up to 50% adder	$50
	PTHP - CEE Tier 2- Multi Family	$250	Per unit	Up to 50% adder	$125
	Integrated Controls for heat pumps	$1,500	Per unit	Same	New
	Circulating Pump	$600	Per unit	Same	$75
	Thermostatic Shower Valves	$20	Per unit	Same	New
	Bathroom Fan	$50	Per unit	Same	$20
	HVAC Maintenance	$250	Per unit	up to $400	$100
	HVAC Quality Install	$500	Per unit	Same	$450
	Supplemental incentive for LMI customers (limited to qualifying HVAC equipment)	$300	per qualifying unit		$200

Notes

1 - The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption.

2 - All rebates will be offered equal to or less than the "Up To" value. Rebate value should not exceed the full measure cost. Tiered rebate amounts may be offered within the incentive ranges listed above for qualified measures that have varying applications or characteristics (e.g. size, features, etc.)

3 - The total rebate value for a smart thermostat will be up to $150 total between both fuel utilities.

Appendix H: Comprehensive Residential Programs (not including repayment plans)			
Program	**Subprogram**	**Description**	**Existing Rebate Strategy**
Whole Home [1]	Home Energy Assessment	Utilities may provide the home energy assessment at no additional cost or for a fee, which may be discounted for certain customers or for promotional periods to drive activity. The home energy assessment may include the direct installation of standard energy efficiency measures that are appropriate for their home	Under Quick Home Energy Checkup, no cost to customer for walk through audit with no cost or low cost measures installed at time of audit
	Whole House Projects	The following incentive structures may be used: Option A: Customer must have a minimum savings percentage of 5% based on modeled reduction of consumption. Rebate is $2,000 + $200 for each percentage point of savings above 5% Rebate Cap = $7,500 OR Option B: Customer incentive will be based on the measures installed: *Weatherization Measures* - Up to 75% of costs for weatherization measures covered *Other EE Measures* - Based on list of prescriptive measures * Initially, ACE, ETG, JC, NJNG, RECO and SJG used Option A and PSE&G used Option B.	Under Home Performance with Energy Star, customer must have a minimum savings percentage of 5% based on modeled reduction of consumption. Rebate is $2,000 + $200 for each percentage point of savings above 5%, up to $6,000.
	Contractor Incentive	Up to $500	Up to $500
Income-Qualified	Income-Qualified Projects	The customer may receive no-cost energy efficiency measures and upgrades with an average project spending guideline and health and safety expense protocol. The program will be designed to provide a greater level of benefits for low-income customers.	Under Moderate-Income Weatherization, no up-front cost to customer for BPI-certified audit with up to $6,000 of direct install and weatherization measures and up to $1,500 on health and safety expenses. Under Low-Income (Comfort Partners) customers may receive no-cost energy efficiency measures and upgrades within project spending guideline and health and safety expense protocol.

Notes

[1] *Multifamily Whole Building is shown on the Multifamily Schedule*

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**Lighting (Retrofit & New Construction)**				
	LED TROFFER LUMINAIRES				
	New LED linear recessed troffer/panel for 2x2, 1x4 and 2x4 luminaires	$100	Per Fixture	Same	$100
	1 x 4 LED new luminaire rated	$100	Per Fixture	Same	
	2 x 2 LED new luminaire	$100	Per Fixture	Same	
	2 x 4 LED new luminaire	$100	Per Fixture	Same	
	LED LINEAR AMBIENT/STAIRWELL LUMINAIRES				
	New LED linear ambient luminaire	$100	Per Fixture	Same	$30 per foot
	LED direct/indirect linear ambient 2 ft. new luminaire	$100	Per Fixture	Same	$30 per foot
	LED direct/indirect linear ambient 3 ft. new luminaire	$100	Per Fixture	Same	$30 per foot
	LED direct/indirect linear ambient 4 ft. new luminaire	$100	Per Fixture	Same	$30 per foot
	LED direct/indirect linear ambient 6 ft. new luminaire	$100	Per Fixture	Same	$30 per foot
	LED direct/indirect linear ambient 8 ft. new luminaire	$100	Per Fixture	Same	$30 per foot
	New LED stairwell luminaire	$100	Per Fixture	Same	$100
	LED INTERIOR DIRECTIONAL LUMINAIRES				
	New LED wall wash luminaire	$60	Per Fixture	Same	$30 per head
	New LED track/mono-point luminaire Directional Lighting Fixtures	$60	Per Head	Same	$40 per foot
	LED DISPLAY CASE LUMINAIRES				
	New LED display case luminaire, including refrigerator/freezer display	$60	Per Fixture	Same	$50
	Refrigerated Case Lighting 4'	$80	Per Fixture	Same	$50
	Refrigerated Case Lighting 5'	$80	Per Fixture	Same	$50
	Refrigerated Case Lighting 6'	$80	Per Fixture	Same	$50
	LED HIGH/LOW BAY LUMINAIRES				
	New LED High Bay	$450	Per Fixture	Same	$600
	New LED Low Bay	$200	Per Fixture	Same	$600
	New LED luminaire - wall packs, flood lights, canopy, landscape	$450	Per Fixture	Same	$600
	LED Architectural Flood and Spot Luminaries				
	LED Bollard Fixtures				
	LED Fuel Pump Canopy				
	LED Landscape/Accent Flood and Spot Luminaires				
	LED Large Outdoor Pole/Arm-Mounted Area and Roadway Retrofit				
	LED Outdoor Pole/Arm-Mounted Area and Roadway Luminaires				
	LED Outdoor Pole/Arm-Mounted Decorative Luminaires				
	LED Outdoor Wall-Mounted Area Luminaires				
	LED Parking Garage Luminaires				
	LED RETROFIT KITS				
	LED linear tube retrofit kit for 2x2, 1x4 and 2x4 fixtures	$50	Per Fixture	Same	$45
	1 x 4 LED retrofit kit	$50	Per Kit	Same	$45
	2 x 2 LED retrofit kit	$50	Per Kit	Same	$45
	2 x 4 LED retrofit kit	$50	Per Kit	Same	$45
	LED integrated retrofit kit for 2x2, 1x4 and 2x4 fixtures	$50	Per Kit	Same	
	1 x 4 LED integrated retrofit kit	$50	Per Kit	Same	$120
	2 x 2 LED integrated retrofit kit	$50	Per Kit	Same	$120
	2 x 4 LED integrated retrofit kit	$50	Per Kit	Same	$120
	LED retrofit kit for linear ambient luminaire	$50	Per Fixture	Same	
	LED direct linear ambient 2 ft. retrofit kit	$50	Per Fixture	Same	$15 per foot
	LED direct linear ambient 4 ft. retrofit kit	$50	Per Fixture	Same	$15 per foot
	LED direct linear ambient 8 ft	$50	Per Fixture	Same	$15 per foot
	LED Retrofit kit for Low Bay	$150	Per Fixture	Same	$100
	LED Retrofit kit for High Bay	$300	Per Fixture	Same	$100
	LED retrofit kit for exterior luminaire Covered below by E39 HID lamps.	$60	Per Fixture	Same	$100
	LED retrofit kit for recessed downlight	$60	Per Fixture	Same	$100

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**LED ENERGY STAR FIXTURES**				
	New LED ENERGY STAR LED fixture - recessed downlight, specialty, cove, under cabinet, vent fan, ceiling mount, etc.	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Accent Light Line Voltage	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Bath Vanity	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Ceiling Mount	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Close to Ceiling Mount	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Cove Mount	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Decorative Pendant	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Downlight Pendant	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Downlight Surface Mount	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Linear Strip	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Other	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Outdoor (Various Types)	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Outdoor Pole-Mount	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Pendant	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Recessed Downlight	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Security	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Solid State Retrofit	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Torchiere	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Under Cabinet	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Wall Sconces	$75	Per Fixture	Same	$100
	Energy Star LED Fixture - Wrapped Lens	$75	Per Fixture	Same	$100
	LED REPLACEMENT LAMPS				
	LED mogul-screw base replacement for HID lamps and new external driver		Per Lamp		$100
	HID Replacement Lamp >250W	$150	Per Lamp	Same	
	HID Replacement Lamp ≤125W	$100	Per Lamp	Same	
	HID Replacement Lamp>125W - ≤250W	$125	Per Lamp	Same	$100
	Vertically-Mounted Lamps	$10	Per Lamp	Same	$80
	Horizontally-Mounted Lamps	$10	Per Lamp	Same	$80
	2G11 Base Lamps	$10	Per Lamp	Same	$80
	LED Replacement Lamps 2' - 8' (Type A, B, C, AB)	$10	Per Lamp	Same	$80
	LED SIGN LIGHTING				
	Exterior/Dusk-to-Dawn, Interior and 24 hour application Covered Above by DLC Exterior Fixture types	$4	Per Watt Reduced	Same	$2 per watt reduced
	OTHER LIGHTING				
	Exit Signs	$25	Per Unit	Same	$23
	Street/Roadway and Area Lighting	$700	Per Fixture	Same	$500
	Horticultural Lighting (Controlled Environment Agriculture) Covered above by DLC Exterior fixture types	$44	Per Fixture	N/A	$600
	Lighting Controls				
	NETWORKED LIGHTING CONTROLS				
	Networked lighting control system controlling efficient luminaires	$0.60 per watt	Per Watt Controlled	Same	NLC System: $0.60 per watt controlled
	NLC - Tier 1, Interior, Mounting Height ≤ 12'				
	NLC - Tier 2, Interior, Mounting Height ≥ 12'				
	NLC - Tier 3, Exterior, All Mounting Height				
	Networked lighting control - fixture level control LLLC	with local or cloud server: $80/fixture with local or cloud server - lower wattage $50/fixture no server required: $60/fixture no server required - (lower wattage min controlled watts 20) $20/fixture	Per Fixture	Same	$60 per fixture

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**DUAL DAYLIGHT/OCCUPANCY CONTROLS**				
	Dual daylight & occupancy sensor (DOS) Product types covered above under LLLC or NLC	$100	Per Fixture	Same	$100
	DAYLIGHT CONTROLS				
	Daylight continuous dimming control	$100	Per Fixture	Same	$100
	Exterior Lighting Control – Fixture with Integrated Controls	$100	Per Fixture	Same	$100
	OCCUPANCY/VACANCY CONTROLS				
	Vacancy or Occupancy control (Switch/Wall/External Mount)	$100	Per Fixture	Same	$100
	Vacancy or Occupancy control (Integrated)	$100	Per Fixture	Same	$100
	Occupancy/Vacancy Sensor – Wall Mounted (Integrated)	$100	Per Fixture	Same	$100
	Occupancy/Vacancy Sensor – Remote Mounted (Integrated)	$100	Per Fixture	Same	$100
	Occupancy Dimming Control (Integrated)	$100	Per Fixture	Same	$100
	Occupancy Sensor for Highbay – Remote Mounted (Integrated)	$100	Per Fixture	Same	$100
	HVAC				
	UNITARY - AIR CONDITIONERS & HEAT PUMPS				
	< 5.4 tons (65,000 BTU/hr)				
	Air Conditioning (AC) only - Split or Packaged		Per Ton		
	Tier 1 SEER 16				
	Single Package Vertical Air Conditioner, <=5.4 Tons, Tier 1	$300	Per Ton	Up to 30% incentive adder	
	Unitary HVAC Single Package System, <=5.4 Tons, Tier 1	$300	Per Ton	Up to 30% incentive adder	
	Unitary HVAC Split System, <=5.4 Tons, Tier 1	$300	Per Ton	Up to 30% incentive adder	
	Tier 2 SEER 18				
	Single Package Vertical Air Conditioner, <=5.4 Tons, Tier 2	$300	Per Ton	Up to 30% incentive adder	
	Unitary HVAC Single Package System, <=5.4 Tons, Tier 2	$300	Per Ton	Up to 30% incentive adder	
	Unitary HVAC Split System, <=5.4 Tons, Tier 2	$300	Per Ton	Up to 30% incentive adder	
	Heat Pumps - Split or Packaged		Per Ton		
	Tier 1 SEER 16 EER 13 HSPF 10				$250
	Air Source Heat Pump, Single Package, <=5.4 Tons, Tier 1	$175	Per Ton	Up to 30% incentive adder	
	Air Source Heat Pump, Split System, <=5.4 Tons, Tier 1	$175	Per Ton	Up to 30% incentive adder	
	Tier 2 SEER 18 EER 13 HSPF 10				
	Air Source Heat Pump, Single Package, <=5.4 Tons, Tier 2	$300	Per Ton	Up to 30% incentive adder	
	Air Source Heat Pump, Split System, <=5.4 Tons, Tier 2	$300	Per Ton	Up to 30% incentive adder	
	>= 5.4 tons (65,000 BTU/hr)				
	Air Conditioning (AC) only - Split or Packaged		Per Ton		
	Unitary HVAC Single and Split Package System, >5.4 Tons & <=20 Tons	$300	Per Ton	Up to 30% incentive adder	
	Heat Pumps - Air Source - Split or Packaged				
	Air Source Heat Pump, Single Package or Split System, >5.4 Tons & <=20 Tons	$300	Per Ton	Up to 30% incentive adder	
	SINGLE PACKAGE VERTICAL				
	Single Package Vertical Air Conditioner - ALL SIZES				
	Single Package Vertical Air Conditioner, >5.4 Tons & <=20 Tons	$300	Per Ton	Up to 30% incentive adder	$250
	Single Package Vertical Heat Pump - ALL SIZES				
	Single Package Vertical Heat Pump, <=11.25 Tons	$300	Per Ton	Up to 30% incentive adder	$250
	CENTRAL DX AIR CONDITIONERS -				
	Central DX Air Conditioner, >20 Tons	$300	Per Ton	Up to 30% incentive adder	$250
	WATER-COOLED & EVAPORATIVE COOLING AIR CONDITIONERS - <5.4 to <11.25 tons		**Per Ton**		
	Water Source Heat Pump, <=11.25 Tons, Tier 1 -5% above baseline	$300	Per Ton	Up to 30% incentive adder	$250
	Water Source Heat Pump, <=11.25 Tons, Tier 2 -12% above baseline	$300	Per Ton	Up to 30% incentive adder	$250
	WATER-COOLED & EVAPORATIVE COOLING AIR CONDITIONERS - >11.25 to ≤63.3	$300	Per Ton	Up to 30% incentive adder	$250

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses- Prescriptive Measures	**GEOTHERMAL HEAT PUMPS -**				
	Geothermal Heat Pumps – (Ground Source/Ground Water Source)		Per Ton		
	Ground Source Heat Pump, <=11.25 Tons, Tier 1 -5% above baseline	$500	Per Ton	Up to 30% incentive adder	$500
	Ground Source Heat Pump, <=11.25 Tons, Tier 2 -12% above baseline	$500	Per Ton	Up to 30% incentive adder	$500
	Ground Water Source Heat Pump, <=11.25 Tons, Tier 1 -5% above baseline	$500	Per Ton	Up to 30% incentive adder	$500
	Ground Water Source Heat Pump, <=11.25 Tons, Tier 2 -12% above baseline	$500	Per Ton	Up to 30% incentive adder	$500
	DUCTLESS, MINI SPLIT AIR CONDITIONERS OR HEAT PUMPS - ALL SIZES	$250	Per Ton	Up to 30% incentive adder	$150
	PACKAGED TERMINAL AIR CONDITIONERS OR HEAT PUMPS				
	PTAC, All sizes	$300	Per Ton	Up to 30% incentive adder	$125
	PTHP, All sizes	$300	Per Ton	Up to 30% incentive adder	$125
	OTHER HVAC EQUIPMENT				
	Smart Thermostat [3]	$150	Per Unit	Up to 30% incentive adder	$125
	Occupancy Controlled Thermostat - Electric	$125		Up to 30% incentive adder	$125
	Dual Enthalpy Economizer Controls			Up to 30% incentive adder	
	< 5 tons Dual Enthalpy Economizer	$350	Per Unit	Up to 30% incentive adder	$250
	> 5 tons Single measure for DNV	$350		Up to 30% incentive adder	$250
	Chillers - Path A Constant Speed				
	Air-Cooled Chiller, Constant Speed <= 1000 tons	$85 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	Water-Cooled Chiller, Screw Chiller - Positive Displacement, Constant Speed <= 600 tons	$185 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	Water -Cooled Chiller, Centrifugal, Constant Speed <= 1000 tons	$85 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	All Constant Speed Chillers => 1000 tons	Custom	Custom	Up to 30% incentive adder	Custom
	Performance Incentive: For each 0.1 EER point above or for each 0.01 kW below minimum efficiency Full Load or Integrated Part Load Value (IPLV).	$10 per ton or Custom	Per Ton	Up to 30% incentive adder	N/A
	Chillers - Path B Variable Speed (VFD)				
	Air-Cooled Chiller, VFD Variable Speed <= 1000 tons	$200 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	Water-Cooled Chiller, Screw Chiller - Positive Displacement, VFD Variable Speed <= 600 tons	$450 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	Water -Cooled Chiller, Centrifugal, VFD Variable Speed <=1000 tons	$20 per ton or Custom	Per Ton	Up to 30% incentive adder	Custom
	All Variable Speed Chillers => 1000 tons	Custom	Custom	Up to 30% incentive adder	Custom
	Performance Incentive: For each 0.1 EER point above or for each 0.01 kW below minimum efficiency Full Load or Integrated Part Load Value (IPLV).	$10 per ton or Custom	Per Ton	Up to 30% incentive Adder	N/A
	Refrigeration				
	Anti-Fog Film	$15	Per Sq. Ft.	Same	$15
	Anti-Sweat Heat Control	$75	Per Door	Same	$50
	Anti-Sweat Heater Control/ Door Heater Control for Cooler/Medium Temp door	$75	Per Door	Same	$50
	Anti-Sweat Heater Control/ Door Heater control for Freezer/Low Temp door	$75	Per Door	Same	$50
	ECM Evaporator Fan Motor, <1 hp		Per Unit	Same	$150
	Reach-in Cooler/Freezer Electronically Commutated Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Reach-in Cooler/Freezer Permanent Split Capacitor Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Reach-in Cooler/Freezer Shaded Pole Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Walk-in Cooler/Freezer Electronically Commutated Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Walk-in Cooler/Freezer Shaded Pole Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Walk-in Cooler/Freezer Permanent Split Capacitor Motor Evaporator Fan Motor control	$150	Per Unit	Same	$150
	Evaporator/Compressor Controller	$1,000	Per Cooler	Same	$1,000
	Evaporative Fan Controls	$200	Per Control	Same	$100
	Floating-head Pressure Controls	$200	Per Control	Same	$150
	Variable Speed Refrigeration Compressor	$2,000	Per Unit	Same	$2,000
	Evaporator Fan Controller on Existing Shaded-Pole Motor DNV Coveted above in ECM category	$200	Per Unit	Same	$100
	Night Cover - Low temp (-32°F to 0°F)	$8	Per Linear Ft	Same	$500 Per Case
	Night Cover - High Temp case temperature (32°F to 55°F)	$8	Per Linear Ft	Same	$500 Per Case
	Night Cover - Medium Temp, case temperature (0°F to 32°F)	$8	Per Linear Ft	Same	$500 Per Case
	Night Covers - Open Reach-In Coolers	$8	Per Linear Ft	Same	$500 Per Case
	Reach-In Door Closer		Per Unit	Same	$75
	Automatic Door Closer - Cooler	$150	Per Unit	Same	$75
	Automatic Door Closer - Freezer	$150	Per Unit	Same	$75

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	Refrigeration Display Case Doors on Open Display Case	$50 per linear ft $600 per case	Per Ln Ft. Per Case	Same	$600 per case
	Gaskets	$7	Per Ln Ft.	Same	$4
	Door Gasket - Cooler Reach-In/ Walk-in	$7	Per Ln Ft.	Same	$4
	Door Gasket - Freezer Reach-in/ Walk-in	$7	Per Ln Ft.	Same	$4
	Strip Curtains for Walk-In Coolers and Freezers	$12	Per Sq. Ft.	Same	$5
	VFD - Variable Frequency Drives				
	Horse Power				
	< 100 hp DNV has binned our VFD measures by the type load controlled per the TRM, not the HP of the motor	<= 10 HP - $1000 per unit <= 50 HP - $2500 per unit <= 100 HP - $5000 per unit	Per Unit	Same	$250
	≥100 to ≤200 DNV has binned our VFD measures by the type load controlled per the TRM, not the HP of the motor	$50	Per HP	Same	$50
	ECM Motors				
	EC Motors =<1 HP	$150	Per unit	Same	$150
	2 HP EC Motors - HVAC Blower Fan	$500	Per unit	Same	$175
	3-5 HP EC Motors - Hydronic Pumps	$500	Per unit	Same	$250
	6-10 HP	$500	Per unit	Same	$500
	11+ HP	$750	Per unit	Same	$750
	Commercial Kitchen Equipment				
	COMMERCIAL DISHWASHERS		Per Unit		$1,500
	Under Counter		Per Unit		
	Commercial Dishwasher - Under Counter LT Electric	$300	Per Unit	Same	
	Commercial Dishwasher - Under Counter HT Electric	$2,500	Per Unit	Same	
	Door Type		Per Unit		
	Commercial Dishwasher - Door Type LT Electric	$850	Per Unit	Same	
	Commercial Dishwasher - Door Type HT Electric	$1,250	Per Unit	Same	
	Single Tank Conveyor		Per Unit		
	Commercial Dishwasher - Single Tank Conveyor LT Electric	$400	Per Unit	Same	
	Commercial Dishwasher - Single Tank Conveyor HT Electric	$2,500	Per Unit	Same	
	Multi Tank Conveyor		Per Unit		
	Commercial Dishwasher - Multiple Tank Conveyor LT Electric	$1,000	Per Unit	Same	
	Commercial Dishwasher - Multiple Tank Conveyor HT Electric	$1,500	Per Unit	Same	
	COOKING EQUIPMENT				
	Fat Fryers		Per Unit	Same	$250
	Vat Fryer - Electric (Standard)	$600	Per Unit	Same	
	Vat Fryer - Electric (Large Vat)	$1,800	Per Unit	Same	
	Griddles - Electric	$600	Per Unit	Same	$300
	Insulated Holding Cabinets		Per Unit		$400
	Hot Food Holding Cabinets - Full Size	$600	Per Unit	Same	
	Hot Food Holding Cabinets - 3/4 Size	$600	Per Unit	Same	
	Hot Food Holding Cabinets - 1/2 Size	$300	Per Unit	Same	
	Commercial Rack Oven	$3,000	Per oven	Same	
	COMBINATION and CONVECTION OVENS				
	Convection Ovens	$600	Per Unit	Same	$400
	Commercial Combination Oven (Electric)	$1,700	Per Oven/Steamer	Same	$1,200
	Commercial Conveyor Oven	$1,700	Per Unit	Same	N/A
	STEAM COOKERS				
	Commercial Steam Cooker	$150	Per Pan	Same	$150
	OTHER FOOD SERVICE				
	Energy Star Beverage Vending Machine	$150	Per Unit	Same	$75
	Pre-Rinse Spray Valve - Electric Water Heating	$75	Per Unit	Same	$75

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**ICE MACHINES**				
	Tier 1	$200	Per Unit	Same	$200
	Tier 2	$300	Per Unit	Same	$300
	SOLID DOOR REACH-IN REFRIGERATORS		**Per Unit**		
	ENERGY STAR® Commercial Solid Door Refrigerator - < 15 ft3	$400	Per Unit	Same	$225
	ENERGY STAR® Commercial Solid Door Refrigerator - > 15 to < 30 ft3	$400	Per Unit	Same	
	ENERGY STAR® Commercial Solid Door Refrigerator - > 30 to < 50 ft3	$400	Per Unit	Same	
	ENERGY STAR® Commercial Solid Door Refrigerator - ≥ 50 ft3	$400	Per Unit	Same	
	SOLID DOOR REACH-IN FREEZERS		**Per Unit**		
	ENERGY STAR® Commercial Solid Door Freezer - < 15 ft3	$400	Per Unit	Same	$500
	ENERGY STAR® Commercial Solid Door Freezer - > 15 to < 30 ft3	$400	Per Unit	Same	
	ENERGY STAR® Commercial Solid Door Freezer - > 30 to < 50 ft3	$400	Per Unit	Same	
	ENERGY STAR® Commercial Solid Door Freezer - ≥ 50 ft3	$400	Per Unit	Same	
	GLASS DOOR REACH-IN REFRIGERATORS		**Per Unit**		
	ENERGY STAR® Commercial Glass Door Refrigerator - < 15 ft3	$300	Per Unit	Same	$150
	ENERGY STAR® Commercial Glass Door Refrigerator - > 15 to < 30 ft3	$300	Per Unit	Same	
	ENERGY STAR® Commercial Glass Door Refrigerator - > 30 to < 50 ft3	$300	Per Unit	Same	
	ENERGY STAR® Commercial Glass Door Refrigerator - ≥ 50 ft3	$300	Per Unit	Same	
	GLASS DOOR REACH-IN Freezers				
	ENERGY STAR® Commercial Glass Door Freezer - < 15 ft3	$300	Per Unit	Same	$300
	ENERGY STAR® Commercial Glass Door Freezer - > 15 to < 30 ft3	$300	Per Unit	Same	
	ENERGY STAR® Commercial Glass Door Freezer - > 30 ft3	$300	Per Unit	Same	
	COMMERCIAL APPLIANCES				
	CLOTHES WASHER			Same	
	CEE Tier 1	$200	Per Unit	Same	$100
	CEE Tier 2	$350	Per Unit	Same	$200
	WATER HEATING				
	Heat Pump Water Heater - C&I	$1,500	Per Unit	Up to 30% incentive adder	$1,500
	Heat Pump Electric Storage Water Heater, size > 55 gallons	$1,500	Per Unit	Up to 30% incentive adder	$1,500
	Heat Pump Electric Storage Water Heater, size ≤ 55 gallons	$1,500	Per Unit	Up to 30% incentive adder	$1,500
	PLUG LOAD CONTROLS				
	Personal Occupancy Sensor	$100	Per Unit	Up to 30% incentive adder	$20
	Hotel Room HVAC Controls	$300	Per Unit	Up to 30% incentive adder	$90
	Hotel Room HVAC/Receptacle Control	$300	Per Unit	Up to 30% incentive adder	$20
	Smart Power Strip - Tier 1	$25	Per Unit	Up to 30% incentive adder	$20
	Smart Power Strip - Tier 2	$50	Per Unit	Up to 30% incentive adder	
	Vending Machine Controls				
	Non-Refrigerated	$150	Per Unit	Up to 30% incentive adder	$75
	Refrigerated	$300	Per Unit	Up to 30% incentive adder	$125
	Glass Front Refrigerated Cooler Control	$150	Per Unit	Up to 30% incentive adder	$125
	OFFICE EQUIPMENT				
	Monitors - C&I	$25	Per Unit	Same	$25
	Computers - C&I	$25	Per Unit	Same	$25
	Uninterruptible Power Supply (UPS)	$75	Per kVA	Same	$40
	Imaging - C&I	$25	Per Unit	Same	$25
	Small Network PC Controller	$35	Per PC Controlled	Same	$25

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**AGRICULTURE**				
	Auto Milker Takeoff	$100	Per Unit	Same	$90
	Dairy Scroll Compressor	$1,000	Per Unit	Same	$1,000
	HE Ventilation Fans	$100	Per Unit	Same	$215
	High Speed Fan 24'' – 35''		Per Unit	Same	$215
	High Speed Fan 36'' - 47''		Per Unit	Same	$215
	High Speed Fan 48'' - 71''		Per Unit	Same	$215
	Heat Reclaimers	$2,500	Per Unit	Same	$1,000
	High Volume Low Speed Fans (Destratification)	$1,200	Per Unit	Same	$25 per ft of fan blade
	High Volume Low Speed Fan (HVLS) 16'			Same	$25 per ft of fan blade
	High Volume Low Speed Fan (HVLS) 18'			Same	$25 per ft of fan blade
	High Volume Low Speed Fan (HVLS) 20'			Same	$25 per ft of fan blade
	High Volume Low Speed Fan (HVLS) 22'			Same	$25 per ft of fan blade
	High Volume Low Speed Fan (HVLS) 24'			Same	$25 per ft of fan blade
	Livestock Waterer	$500	Per Unit	Same	$60
	Dairy Vac Pump VSD Controls	$2,000	Per Unit	Same	$1,000
	Low Pressure Irrigation	$100	Per acre	Same	$100
	Dairy Refrigeration Tune-Up	$200	Per Unit	Same	$200
	Engine Block Heater Timer	$25	Per Unit	Same	$25
	RESIDENTIAL APPLIANCES in C&I BUILDING - Non Commercial Duty				
	Clothes Washer Tier 1	See Residential Incentives	Per Unit	Same	See Residential Incentives
	Clothes Washer Tier 2	See Residential Incentives	Per Unit	Same	See Residential Incentives
	Clothes Dryer - Tier 1	See Residential Incentives	Per Unit	Same	See Residential Incentives
	Clothes Dryer - Tier 2	See Residential Incentives	Per Unit	Same	See Residential Incentives
	Refrigerators	See Residential Incentives	Per Unit	Up to 30% incentive adder	See Residential Incentives
	Freezer	See Residential Incentives	Per Unit	Up to 30% incentive adder	See Residential Incentives
	Dehumidifier	See Residential Incentives	Per Unit	Up to 30% incentive adder	See Residential Incentives
	Room Air Conditioner	See Residential Incentives	Per Unit	Up to 30% incentive adder	See Residential Incentives
	Water Cooler	See Residential Incentives	Per Unit	Up to 30% incentive adder	See Residential Incentives
Custom	**CUSTOM PROJECTS**				
	For example: Compressed Air, Refrigeration, Data Center Equipment/Servers, HVAC/Chillers, HVAC Controls, Motors/VFD - Large, Building Improvements, Process Improvements, Agricultural Lighting/Process, Custom Lighting, Demand Controlled Ventilation, Energy Recovery Ventilator, Heat Recovery Ventilator	Incentives are calculated based on the lesser of two factors. 75% of project cost, or $0.32/kWh and $16/therm saved in the first year.	per kWh	Up to 30% incentive adder	Incentives are calculated based on the lesser of two factors. 50% of project cost, or $0.35/kWh saved in the first year.

Appendix H: Commercial Sector Incentives (not including repayment plans)					
Program	**Prescriptive Measure [1]**	**Rebate Up To Value ($) EDC/GDC Consensus Rebate Strategy [2]**	**Unit Basis**	**Multifamily Income-Eligible Rebate Up to Value ($)**	**Existing Up to Rebate Values [4]**
Energy Solutions for Businesses-Prescriptive Measures	**ENERGY MANAGEMENT**				
	Bldg. - Tune-Up	**Consensus EDC/GDC Incentive Strategy**	**% of Project Cost**		**Existing Incentive Up to Value**
	Lighting Optimization	$0.32 / kWh	Up to 80%		Up to 70% of Project Cost w project cap of $75,000
	HVAC Optimization	$0.64 / kWh	Up to 80%		
	Chiller Optimization	$0.64 / kWh	Up to 80%		
	Refrigeration Optimization	$0.64 / kWh	Up to 80%		
	Electric Other Optimization	$0.64 / kWh	Up to 80%		
	Gas Optimization	$10.00 / therm	Up to 80%		
	Boiler Tuneup	$10.00 / therm	Up to 80%		
	Furnace Tuneup	$600	Up to 80%		
	HVAC Tune-Up				
	Single Compressor Units	$350	Up to 80%		$175 per unit
	Multiple Compressor Units	$500			$250 per unit
	PTAC,PTHP, Mini Splits	$300			$75 per unit
	Electric/Other	$0.64 / kWh	Up to 80%		N/A
	Boiler Tuneup	$10.00 / Therm	Up to 80%		$1 per MBH
	Furnace Tuneup	$600	Up to 80%		$250
	Dairy Refrigeration Tune-Up	$600	Up to 80%		$200 per unit
	Retro-commissioning				
	RCx Services (Audit, Implementation, M&V) (for trade ally services only)	-	Up to 100%		N/A
	Customer/Trade Ally Incentive for verified energy savings	$0.64 / kWh and $10.00 / therm	Up to 70%		Up to $0.35 per kWh
	BOC Training				
	Building Operations Training	Up to 70%	$1,000 / Applicant cap		Up to 70% of the cost to attend qualified BOC training up to $1000 per person.
	Strategic Energy Mgmt.				
	SEM Services (Audit, Implementation, M&V)	-	Up to 100%		N/A
	Customer Incentive for verified energy savings	$0.64 / kWh and $10.00 / therm	Up to 70%		Up to $0.35 / kWh
	Virtual Commissioning VCx				
		$0.30 / kWh			Up to $0.35 per kWh
	Monitoring Based Commissioning				
	MBCx (Audit, Implementation, M&V)		Up to 100%		N/A
	Customer Incentive for verified energy savings	$0.64 / kWh	Up to 70%		Up to $0.35 per kWh

Notes

1 - The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption.

2 - All rebates will be offered equal to or less than the "Up to" value. Rebate value should not exceed the full measure cost.

3 - The total rebate value for a smart thermostat will be up to $150 total between both fuel utilities

4 - Existing up-to rebate values may vary by program administrator.

Appendix H: Comprehensive Commercial Programs (not including repayment plans)			
Program	**Category**	**Description of Approach to Incentives [1 & 2]**	**Existing Incentives [3]**
Direct Install	Tier 1	For Tier 1 customers the program will offer to pay up to 80% of the project cost to install the recommended energy efficiency measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through a repayment plan. Tier 1 will serve all customers with an average annual individual facility peak electrical demand of up to 100 kW and an average annual natural gas load of up to 5,000 therms.	For Tier 1 customers, standard basic energy savings measures may be installed at no cost during the time of the energy assessment. The program will offer to pay up to 80% of the project cost to install the recommended energy efficiency measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through an available repayment option. Customers located in an Urban Enterprise Zone, Opportunity Zone, owned or operated by a local government, or K-12 public schools. may also qualify for Tier 1 status, up to an average individual facility peak electrical demand of 200 kW .
	Tier 2	For Tier 2 customers, program will offer to pay up to 80% of the project cost to install the recommended energy efficiency measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through a repayment plan. Tier 2 will serve all customers with an average annual individual facility peak demand of up to 300 kW or average annual natural gas load of 40,000 therms located within an Urban Enterprise Zone ("UEZ"), Opportunity Zone, Overburdened Community ("OBC"). Also eligible are customers with an average annual individual facility peak demand of up to 300 kW or an average annual natural gas load of 40,000 therms that are owned or operated by a local government, K-12 public schools, or that are non-profits categorized as 501(c)3.	Tier 2 will serve the larger segment of eligible customers, with an average individual facility peak electrical demand of 101 - 200 kW over the past 12 months. Incentives up to 70% of the total project cost will be offered.
	Tier 3	Tier 3 will serve the larger segment of eligible customers, with an individual facility average annual peak electrical demand of 101 - 300 kW or 5,001 therms to 40,000 therms over the past 12 months. Incentives up to 70% of the total project cost will be offered with the participating customer repaying the balance not covered through the incentive either in a lump sum or through a repayment plan.	N/A - new
Energy Solutions	Engineered Solutions - Tier 1	Will provide a 100% incentive for an up-front audit, the specific audit level will be determined on a project-by-project basis based on the complexity of the facility and the potential energy efficiency measures. In addition, the utilities will buy-down the simple payback of the recommended energy-efficiency project cost for approved measures by up to six years, with the resulting payback not less than three years. After the project incentive buy-down, the remaining project costs may be funded by the program with participants repaying the balance of the project costs through a repayment plan.	The subprogram will provide a 100% incentive for an up-front ASHRAE audit, the specific audit level will be determined on a project by project basis based on the complexity of the facility and the potential energy efficiency measures. In addition, JCPL will buy-down the simple payback of the recommended energy-efficiency project cost for approved measures by up to six years, with the resulting payback not less than three years. After the project incentive buy-down, the remaining project costs may be funded by the subprogram with participants repaying the balance of the project costs through OBRP or access to financing with similar terms.
	Engineered Solutions - Tier 2	Incentives for the Engineered Solutions Tier 2 pathway will provide incentives for both technical assistance services and other project costs determined on a project-by-project basis using a cost effectiveness tool up to 60% of project cost.	
	Energy Management	Incentives for the Energy Management pathway are structured around the measure categories that focus on specific energy efficiency measures and management practices as follows: **HVAC Tune-Up**: Fixed incentives for the implementation of the tune-up measures based on the size of the HVAC units. **Building Tune-Up:** Incentives that cover up to 80% of the project cost and up to 70% of the cost to attend qualified BOC training up to $1000 per person. **Retro-Commissioning:** Incentives to cover up to 100% of the initial cost to perform the required ASHRAE level audit. The total project incentive will be capped at up to 70% of the project cost. The customer may also be paid a custom incentive for the implementation of the energy efficiency measures determined through the audit. **Monitoring-based Commissioning, Virtual Commissioning:** Incentives to cover up to 100% of the cost of integration of third-party hardware and software. Utilities may also implement a performance-based model with an implementation contractor where the utility only pays for delivered and verified energy savings. **Strategic Energy Management:** The utility or third-party implementation contractor may perform an engineering assessment of the customer's facility to develop a SEMP or the customer may choose to utilize a consultant of their choosing to perform an engineering assessment to develop the SEMP. Customers who utilize a consultant will receive an incentive to cover up to 100% of the initial cost of the engineering assessment. A tiered incentive structure for customer engineering assessment may be utilized based upon square footage of a customer's facility. The SEMP will identify short, medium and long-term goals for the customer and will set identifiable metrics for mapping to the plan. For the implementation of the energy efficiency measures determined by the SEMP, the customer will be paid an incentive that is commensurate with the applicable Commercial & Industrial Program offering that the measures are attributed.	Incentives for the Energy Management pathway are structured around the measure categories that focus on specific energy efficiency measures and management practices as follows: **HVAC Tune-Up**: Fixed incentives for the implementation of the tune-up measures based on the size of the HVAC units up to $250 value. **Building Tune up**: Incentives that cover up to 70% of the project cost with a project cap of $75,000 and up to 70% of the cost to attend qualified BOC training up to $1,000 per person. **Retro-Commissioning**: Incentives to cover up to 50% of the initial cost to perform the required ASHRAE level audit, and the remaining cost upon the customer commitment to implementation of energy efficiency measures defined by the audit. The customer will also be paid a custom incentive for the implementation of the energy efficiency measures determined through the audit. The total audit and project incentive will be capped at up to 70% of the project cost. **Strategic Energy Management**: Customers who utilize a consultant will receive an incentive to cover up to 50% of the initial cost of the engineering assessment, with the remaining cost upon the customer commitment to implementation of energy efficiency measures defined by the SEMP process. A tiered incentive structure for Customer engineering assessment will be utilized based upon square footage of Customer's facility. The SEMP will identify short, medium, and long-term goals for the customer and will set identifiable metrics for mapping to the plan. For the implementation of the energy efficiency measures determined by the SEMP, the customer will be paid an incentive that is commensurate with the applicable Commercial & Industrial Program offering that the measures are attributed.

Notes

1 - The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption.

2 - All rebates will be offered equal to or less than the "Up To" value.

3 - Represents current incentives and does not including financing incentives. See Section 4H.

Appendix H: Multifamily Incentives (not including repayment plans)				
Program	**Pathway**	**Measure [1]**	**Rebate Strategy [2]**	**Existing Rebate Strategy**
Multifamily	N/A	Prescriptive	Please refer to the Residential and Commercial Schedules. Note the additional column for income eligible projects	Energy Assessment with the equipment and installation costs for the standard energy savings measures will be provided to eligible properties with “Up to 100%” of the cost provided by the program.
		MF Whole Building (successor to current MF HPwES Program)	Tiered incentive cash rebate not to exceed 50% of the costs of the measures used to calculate Total Energy Savings, up to $1,750 per unit. - Contractor production incentive of up to $50 per unit. (Will stay with the lead utility.)	- Tiered incentive cash rebate not to exceed 50% of the costs of the measures used to calculate Total Energy Savings, up to $1,500 per unit - Up to $50 contractor production incentive per unit
		MF Direct Install	Provide incentives consistent with proposed Tiers within Small Business Direct Install Program	N/A
		MF Energy Solutions (ES)- regular customers	Follow structure of C&I Energy Solutions	- Program will buy-down the simple payback of the recommended energy-efficiency project cost for approved measures by up to six years, with the resulting payback not less than three years.
		MF Energy Solutions - special Income Eligible treatment	For Engineered Solutions Tier 1 – Keep to 6 year buydown. For Engineered Solutions Tier 2 – Increase the incentive up to 80% of project costs.	N/A- No special treatment

Notes

1 - The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption.

2 - All rebates will be offered equal to or less than the "Up to" value.

Appendix H: JCPL Building Decarbonization and Demand Response Incentives		
Program	**NJ Measures**	**Rebate Up To Value ($)[1]**
Decarb	Induction Cooktop Stove	$2,500
	Electric Clothes Dryer	$2,500
	Heat Pump	$3000 per 10,000 BTUh
	Geothermal Heat Pump	$4500 per 10,000 BTUh
	Heat Pump Water Heater	$3,000
	Efficient Electric Equipment	Up to 80% of Conversion Cost
	Make Ready Work	$7,500
Load Optimization & PDR	Enrollment	$200
	Participation-Prescriptive	$50/yr
	Participation-Performance	$200/kw-yr

[1] *An adder of Up to 25% of the incentive amount will be provided for LMI customers*

6i. Appendix I: Comfort Partners Transition Plan

The Utilities strongly believe the current Comfort Partners Program ("CP") should be transitioned to full Utility administration in the second triennium and are grateful to the Board for its consideration of the switch. There are several reasons the Utilities believe this transition is both beneficial to customers and consistent with the Clean Energy Act. The Utilities believe the switch can benefit customers by consolidating program design, implementation and evaluation. For participants, having the low-income segment program designed and marketed with the moderate-income program will improve the customer experience by easing access to the program through a streamlined and singular path of entry; the consolidation of the low- and moderate- income segment programs will also allow for the alignment of marketing, the application process, and implementation. It will become a seamless program for all income-qualified customers, as opposed to having two separate, potentially confusing, program offerings in the market.

Furthermore, administration and evaluation of the program would be consolidated within the utilities' program portfolio, which will help to better manage the costs of the program to all customers by integrating the administration and evaluation costs within the larger portfolio and taking advantage of economies of scale. And finally, this switch combines the responsibility for savings performance and budgets to the Utilities alone, which clarifies responsibility in achievement of the Clean Energy Act savings targets and streamlines reporting. The current program cycle has savings and budget responsibility split between the Utilities and the Division of Clean Energy, which does not provide the Utilities with adequate opportunity to appropriately manage the program and achieve the mandated targets.

This document details the utilities' proposed plan to ensure a smooth transition from the existing co-managed Comfort Partners Program to the new utility-run Income Qualified Program.

Schedule

Planning Period

The Planning Period is necessary for the Utilities to develop a detailed tactical approach for the transition. This Planning Period is expected to run from July 2024 through January 2025. Although some high-level exploratory pre-planning efforts necessary to develop the Utility filings have already been underway, this more detailed planning period, starting in 2024, is critical to ensure a seamless transition of the myriad processes and responsibilities that will make the transition and future program successful. This period is required to ensure the Utilities have enough time to address details related to sunsetting Comfort Partners and transitioning processes and resources to the new combined Income Qualified Program. Note that the transition timeline is subject to adjustment to allow for a timely and effective process.

Soft Transition Period

The Soft Transition Period, is defined as the six-month period during which, Comfort Partners is expected to remain unchanged with regards to services delivered, resource allocation, implementation vendors, procedures manual, marketing strategy, eligibility criteria, data tracking

systems, etc. During the Soft Transition Period, the Comfort Partners Program budget will be included in the utilities' filed budgets, specifically the Income Qualified Program. Additionally, Board Staff will no longer have a program administrative role but will retain regulatory oversight of the program similar to the role they have with other CEA programs.

During the Soft Transition Period, the Utilities will also begin to execute the transition plan developed during the Planning Period. This includes implementing the closeout of specific Comfort Partners operations such as marketing, enrollment, and assessments prior to the launch of the new combined Income Qualified Program.

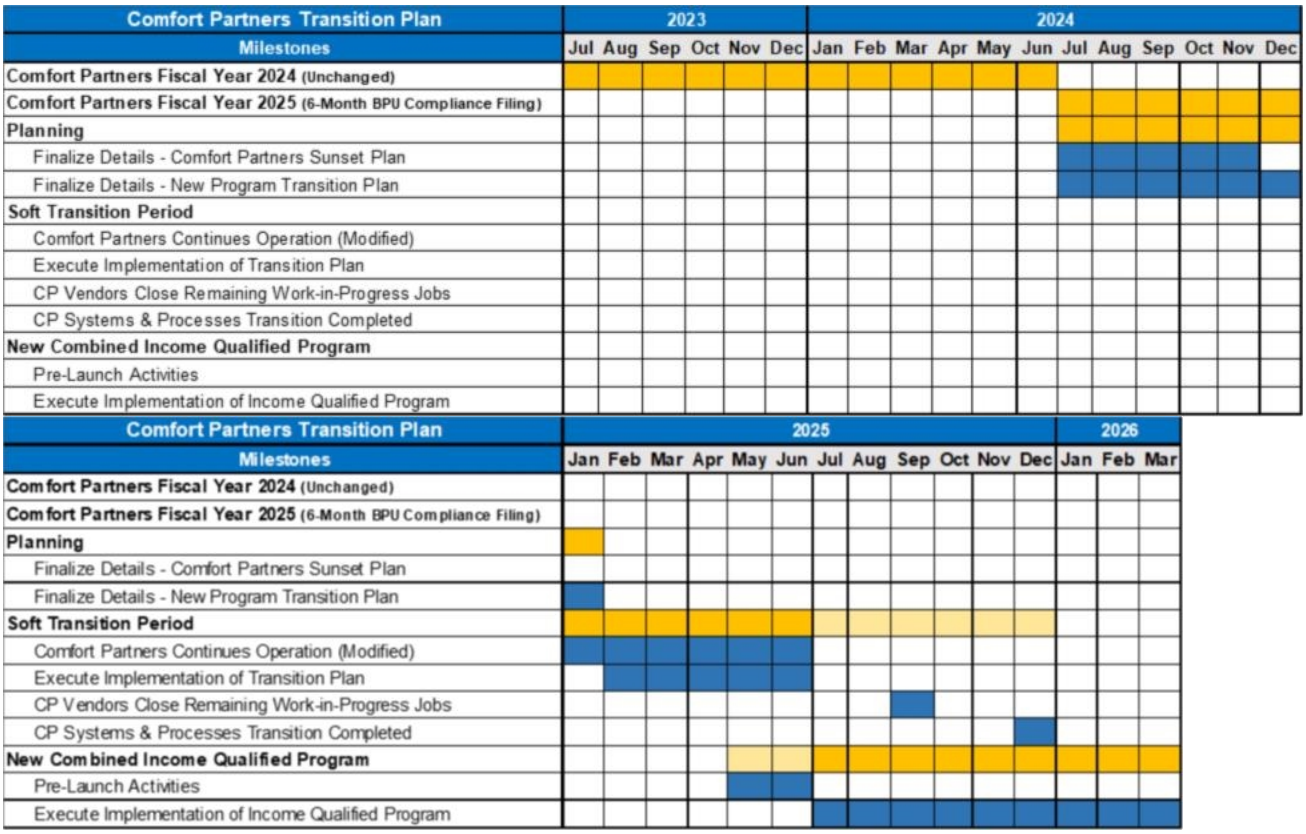
During the final months of the Soft Transition Period, the Utilities will also begin to ramp-up the new combined Income Qualified Program in parallel with the Comfort Partners Program sunset. The ramp-up involves training vendors, launching marketing, preparing enrollment resources, and eventually scheduling assessments; all to ensure the transition is seamless for customers and program momentum is maintained (some activities could feature a minor overlap between the programs in order to ensure there are no gaps in customer access to the program offering and to seek to avoid disruption to the workforce serving the program).

The schedule allows for an important timing overlap between the Comfort Partners sunset and the new combined Income Qualified Program launch which will be crucial to maintaining participation momentum in this customer segment. The overlapping period allows for the Comfort Partners Working Group to close out committed work-in-progress jobs and shutdown systems and processes related to the legacy Comfort Partners Program. Having this additional time to close out committed customer projects enables the Comfort Partners Program to continue to serve customers up until the new combined Income Qualified Program can begin enrollment efforts, eliminating any gap in service.

New Combined Income Qualified Program

The second period of the transition, which will begin in PY5, represents the time post-launch of the new combined Income Qualified Program that will serve both low- and moderate-income residential customers.

Please find the full description of the Income Qualified Program in Section 3.a.i.2 of this Program Plan.



Notes:

1) **Comfort Partners Program Fiscal Year 2024** – Comfort Partners will remain unimpacted by the transition plan during Fiscal Year 2024. The Fiscal Year 2024 Compliance Filing will govern the Comfort Partners Program during this period, as per the normal process historically.
2) **Comfort Partners Program Fiscal Year 2025 (1st Half)** – The Division of Clean Energy submits a Compliance Filing for a 6-month abbreviated Program Year running from July 2024 through December 2024.
3) **Comfort Partners Program Fiscal Year 2025 (2nd Half)** – January 2025 to mark the start of the Soft Transition Period, in which, the Program maintains the implementation and contracting structure but transitions funding from SBC to CEA funds.
4) Transition timeline is subject to adjustment to allow for a timely and effective process.

Budgets

Triennium 2

Utilities will consider historical incentive budgets to determine what the annual Low-Income budget should be within the overall Income-Qualified Program offering. The filing will include individual Utility budgets for the next triennium.

Administration

The Soft Transition Period is tentatively scheduled to begin January, 2025. During that timeframe, the Comfort Partners Working Group will continue to implement the program similiar to previous years, including the implementation structure, procedures manual, vendors, marketing strategy, enrollment criteria, data tracking system, etc. The CP Working Group will coordinate with the Joint Utility Residential Working Group during this time. Board Staff will no longer have a program administrative role but will retain regulatory oversight of the program similar to the role they have with other CEA programs. Quarterly and annual reports will be provided with regards to program targets via the existing Utility CEA program reporting process and the Utilities can provide status updates through the Utility Working Group discussions.

The Income Qualified Program will be similar to the current Moderate Income Weatherization Program implementation structure. The dollars, participants, and savings will be shared via the SWC system. Each Utility will hire their own implementation vendors to operate the program in their territory and coordinate delivery of the program with their other residential-sector programs in order to streamline customer access to the programs. Utilities may consider continuing working relationships with current Comfort Partners vendors where possible.

During the soft transition period, Comfort Partners and the moderate-income pathway in the Income Qualified Program will not change their eligibility thresholds, rules, and verification process from the way they are currently handled. The future, combined Income Qualified Program will continue to utilize the Federal Poverty Level thresholds for low- and moderate-income that were used in the previous programs, but may consider adjusting them in the future, particularly to align and leverage other programs targeted at low-income customers or to take advantage of Inflation Reduction Act1 ("IRA") incentives.

The Utilities will consider adjusting the landlord approval process as related to tenant participation.

Regarding the multifamily rules/procedures, the program will remain consistent during the Soft Transition Period.

Net Cost Savings / Additional Benefits

The utilization of a multi-year budget cycle will allow for better long-term forecasting and provide consistency and predictability to program management. This approach would allow Utilities to continuously improve management and implementation processes to provide increased efficiencies and reduce administrative burden and costs.

Reduced administrative burden would provide benefits to the utilities, their low- and moderate-income customers, and all utility customers, by lowering the total costs of program administration. In its current state, the Comfort Partners Program is delivered jointly and collaboratively by the seven investor-owned utilities in New Jersey. This requires duplicative effort in legal review, info and cyber security, senior leadership review and execution, etc. for contracting efforts.

There are a number of contributing factors that make it difficult to estimate the potential combined utility costs savings at this time. These include but are not limited to:

- An expectation that the Utilities will serve more participants so some administrative savings may be absorbed by the need to process additional projects.
- Intention to increase the allowance for health and safety expenses to improve the historic percentage of customers that have not been able to fully proceed through the program which will result in larger projects that may require more administrative review.
- More detailed information about processes will not be available until after the transition period is completed
- Unknown potential administrative activities that may be necessary if the program aligns with IRA programs

However, at a minimum the Utilities believe there would be savings from the elimination of the use of the current joint program tracking system by PY6. The current forecasted annual cost is approximately $800,000.

Combination of the low- and moderate-income programs ("LMI") would ease confusion with the customer base and ensure that potential participants are directed to the pathway that is right for them rather than try to find the right pathway to fit their needs. A combined Income Qualified Program would ease contractor confusion and reduce the need for referrals from one program to another, streamlining the customer journey to ensure they begin receiving services on the first visit, and reducing unproductive visits from contractors leading to non-billable hours. This would help reduce the costs of implementation, providing that every visit would be productive. Additionally, this would help prevent income-qualified customers from having to use vacation days, sick time, or unpaid time off for appointments that are unproductive, and reduce the need for multiple visits with no services rendered.

The removal of defined territories for individual implementation contractors would enable implementers within each Utility's territory to address customers in a more timely manner.

Customers residing in joint delivery territory could potentially be addressed by multiple contractors, providing additional flexibility of scheduling and delivery of services.

A single combined income-qualified offering would simplify marketing and outreach efforts by providing a single point of entry and casting a larger net to reach a larger population of potential participants. A combined offering would ease training of outreach coordinators and community partners, which would help the outreach efforts reach a larger population. A combined offering could also make it easier to align with available federal funding for integration into these programs in the future.

Lastly, a combined offering would enable simpler reporting of key metrics and expenditures to regulators.

Appendix J, Table J-1: Cost Assumptions	
The following details the assumptions for each cost element used in the budget tables of the Plan.	
Cost Elements	**Description**
Utility Administration	Utility Administration costs were based on the Company's estimated Portfolio administration costs. These include costs incurred by the utility for employee labor and other costs for oversight and management of the portfolio. Also includes costs to perform duties associated with activities, such as plan and program design, compliance reporting, workforce development or other industry or market initiatives or meetings to support the Plan (Ex. stakeholder meetings, working groups, etc.). Utility Administration costs are estimated based on actual spend or Company estimates. Costs are allocated, based on the estimated direct charges to program components, and summed to the program level.
Marketing	Marketing costs were informed by Company estimates of both Utility and Third-Party Implementation Contractor pricing for the plan or programs.. Program specific marketing costs were identified by two components, (1) fixed program/sub-program and (2) variable unit cost. Costs in this category also includes costs associated with developing and providing marketing/promotional strategies, advertising space, materials, and costs associated with outreach initiatives to Community Based Organizations.
Outside Services	Outside Services costs were informed by Company estimates of Third-Party Implementation Contractor costs for the programs. Third-Party Implementation Contractor costs were identified by two components, (1) fixed program and (2) variable unit cost and includes costs for the management and implementation of programs, including staffing, websites(s), data collection and transfers, call centers, incentive processing, quality assurances and control processes, and other activities supporting successful program implementation. Also includes other third-party costs including program design support services, hosted tracking system software, Statewide Coordinator, and financing administration costs.
Inspections and Quality Control	Inspections and quality control costs were informed by Company estimates of performing inspections on completed projects for each program to ensure quality and delivery conforms to program requirements. Inspections and Quality Control costs were identified by two components, (1) fixed program/sub-program, and (2) variable unit cost.
Evaluation (EM&V)	EM&V costs were based on company estimate based on past actuals and contractor pricing information. Includes costs for evaluation, measurement and verification activities performed by the Company and the Company's independent third-party evaluator. These funds are spent on evaluation, surveys, M&V processes, data transfer responsibilities, research, studies and participation in evaluation and working group meetings.
Incentives	Incentives include rebates paid to customers, the costs associated with the value of services or measures provided to customers, or upstream payments to trade allies (retail stores, distributors, contractors, etc.) where applicable. Incentives also includes financing principle to provide customers access to low- to no-cost financing for certain program offerings. Additionally included are estimates for Health and Safety costs for applicable programs.

Appendix J, Table J-2: Measure Assumptions													
Sector	Program Type	Program	Measure	Measure Life	Verified kWh	Verified kW	NTG	Incremental Cost	Modeled Rebate	Gas Savings (Therms/Yr)	Source of Savings	Source of Measure Life	Source of Inc Cost
Residential	Core Utility	Energy Efficient Products	Freezer Recycling	4	593	0.10	0.58	$0	$80	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Refrigerator Recycling	5	883	0.14	0.51	$0	$80	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner Recycling	3	163	0.08	0.50	$0	$50	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Dehumidifier Recycling	4	955	0.22	0.41	$0	$75	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Mini Refrigerator Recycling	6	201	0.04	0.51	$0	$50	-	Co Assumption	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Clothes Washer	14	128	0.01	0.51	$216	$150	5.76	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Refrigerators	12	61	0.01	0.47	$79	$100	(1.13)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner	12	75	0.04	0.60	$26	$40	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Freezers	11	38	0.01	0.52	$50	$50	(0.70)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Clothes Dryer	12	33	0.00	0.58	$416	$30	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	9	159	0.02	0.65	$87	$38	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	12	123	0.02	0.60	$12	$25	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	10	1,622	-	0.78	$778	$1,000	(7.59)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Dishwashers	11	18	0.00	0.52	$151	$30	0.67	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Water Coolers	10	47	0.01	0.52	$24	$30	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Elec Vehicle Chargers - Res	10	9	0.00	0.77	$80	$50	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Beverage Coolers	12	30	0.00	0.47	$50	$25	(0.56)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	5	97	0.01	0.90	$26	$25	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	TVs	6	16	3.38	0.83	$10	$30	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Sound Bars	7	48	0.00	0.83	$0	$25	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Smart Home	15	5	0.00	0.75	$11	$25	(0.15)	Co Assumption	Co Assumption	Co Assumption
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	15	35	0.00	0.75	$88	$15	(0.02)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	10	21	-	0.45	$12	$5	-	NJ TRM	NJ TRM	Co Assumption
Residential	Core Utility	Energy Efficient Products	Ceiling Fans	15	80	0.01	0.72	$58	$20	(68.68)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	5	108	-	0.74	$148	$100	50.84	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	5	97	0.01	0.90	$26	$25	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	10	1,622	-	0.78	$778	$1,000	(7.59)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	9	159	0.02	0.65	$87	$38	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	10	21	-	0.45	$12	$5	-	NJ TRM	NJ TRM	Co Assumption
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	12	123	0.02	0.60	$12	$25	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	15	35	0.00	0.75	$88	$15	(0.02)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Air Source Heat Pumps	15	347	0.21	0.65	$638	$1,500	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Central Air Conditioners	15	312	0.37	0.74	$1,102	$750	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split Heat Pump	15	322	0.18	0.65	$291	$500	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split A/C	15	192	0.24	0.65	$411	$250	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	PTAC	15	87	0.08	0.74	$163	$50	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	PTHP	15	222	0.08	0.65	$135	$100	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Heat Pump - Water & Geothermal	25	7,338	-	0.67	$4,243	$2,500	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Furnace Fans	7	363	0.04	0.63	$404	$50	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	5	108	-	0.74	$148	$100	50.84	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	HVAC - Tune Up	15	135	0.06	0.60	$131	$100	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Circulating Pump	7	630	0.14	0.76	$190	$50	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	HE Bathroom Fans	19	35	0.00	0.60	$44	$25	-	MA TRM	MA TRM	MA TRM
Residential	Core Utility	Energy Efficient Products	HVAC Quality Install	15	302	0.16	0.60	$0	$150	-	Co Assumption	Co Assumption	Co Assumption
Residential	Core Utility	Energy Efficient Products	Cold Climate Air Source Heat Pumps	15	1,159	0.59	0.78	$4,971	$2,000	-	NJ TRM	NJ TRM	NJ T2 Inc Cost
Residential	Core Utility	Energy Efficient Products	Cold Climate DMSHP	15	322	0.18	0.65	$291	$750	-	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	10	1,622	-	0.78	$778	$1,000	(7.59)	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Whole Home	Comprehensive Retrofit	20	1,526	0.34	0.77	$6,709	$3,500	245.09	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Whole Home	Home Energy Assessment	10	430	0.04	0.43	$335	$300	5.93	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Income Qualified - MI Wx	MI Weatherization	18	1,397	0.17	0.83	$5,108	$5,500	185.62	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Income Qualified - MI Wx	Health & Safety Incentive	0	-	-	-	$0	$1,000	-	-	-	-
Residential	Core Utility	Income Qualified - LI	Comfort Partners	19	1,132	0.15	0.98	$5,779	$12,000	205.51	EE Consultant	EE Consultant	EE Consultant
Residential	Core Utility	Income Qualified - LI	Health & Safety Incentive	0	-	-	-	$0	$2,150	-	-	-	-
Residential	Core Utility	Behavioral	Behavioral FY25	1	50	0.01	1.00	$0	$0	-	Vendor	Industry Stndrd	N/A
Residential	Core Utility	Behavioral	Behavioral FY26	1	127	0.03	1.00	$0	$0	-	Vendor	Industry Stndrd	N/A
Residential	Core Utility	Behavioral	Behavioral FY27	1	131	0.03	1.00	$0	$0	-	Vendor	Industry Stndrd	N/A
Multifamily	Core Utility	Multifamily	Multifamily	18	7,896	2.20	0.82	$36,666	$5,132	1,820.02	EE Consultant	EE Consultant	EE Consultant
Multifamily	Core Utility	Multifamily	Multifamily - Engnrd Solutions	15	75,125	8.58	0.91	$18,043	$48,832	5,700.00	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 1	15	30,500	6.40	0.91	$7,700	$19,825	3,050.00	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 2	15	50,800	10.50	0.91	$12,750	$33,020	5,080.00	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 3	15	76,200	15.75	0.91	$19,125	$49,530	7,620.00	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Clothes Dryer - Consumer - C&I	12	252	0.00	0.58	$719	$150	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Clothes Washer - Consumer- C&I	11	162	0.02	0.51	$371	$100	23.65	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Dehumidifier - Consumer - C&I	12	97	0.03	0.49	$12	$25	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	EV Charging - C&I	10	9	0.00	0.77	$80	$50	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Freezer - Consumer - C&I	11	38	0.01	0.52	$50	$50	(0.70)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Refrigerators - Consumer - C&I	12	61	0.01	0.47	$79	$100	(1.13)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Water Cooler - Consumer - C&I	10	47	0.01	0.52	$24	$20	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Water Heater - Heat Pump - C&I	10	2,804	0.73	0.71	$1,285	$1,000	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Freezer Recycling - C&I	4	883	0.14	0.51	$0	$80	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Refrigerator Recycling - C&I	4	593	0.10	0.58	$0	$80	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Room Air Conditioner Recycling - C&I	3	403	0.16	0.50	$0	$50	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Dehumidifier Recycling - C&I	4	1,201	0.30	0.41	$0	$75	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Mini Refrigerator Recycling - C&I	6	201	0.04	0.51	$0	$50	-	Co Assumption	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>5.4 < 20 Ton) - C&I	15	726	0.60	0.93	$512	$2,000	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (<=5.4 Ton) - C&I	15	405	0.33	0.93	$1,102	$750	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>=20 Ton) - C&I	15	726	0.60	0.93	$512	$2,000	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Circulating Pump - C&I	15	662	0.12	0.84	$2,827	$150	3.72	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	DMS Heat Pump - C&I	15	645	0.36	0.83	$428	$350	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Ductless Mini-Split A/C - C&I	15	192	0.24	0.65	$411	$350	-	EE Consultant	EE Consultant	EE Consultant

Appendix J, Table J-2: Measure Assumptions													
Sector	Program Type	Program	Measure	Measure Life	Verified kWh	Verified kW	NTG	Incremental Cost	Modeled Rebate	Gas Savings (Therms/Yr)	Source of Savings	Source of Measure Life	Source of Inc Cost
C&I	Core Utility	Prescriptive / Custom	Furnace Fans - C&I	7	363	0.04	0.63	$404	$50	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 1 Ph)	15	376	0.19	0.83	$651	$750	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Heat Pumps - Wtr & GeoT - C&I	15	1,063	0.66	0.83	$1,861	$2,500	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	PTAC - C&I	15	70	0.06	0.83	$163	$70	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	PTHP - C&I	15	186	0.06	0.83	$163	$110	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Rm Air Condnr, Consumer - C&I	12	75	0.04	0.60	$26	$25	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Smart Thermostat - C&I	5	78	-	0.81	$111	$100	12.89	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Heat Pump - Cold Climate C&I (<=5.4 Ton, 1 Ph)	15	1,159	0.59	0.83	$4,971	$2,000	-	NJ TRM	NJ TRM	NJ T2 Inc Cost
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 3 Ph)	15	785	0.34	0.83	$1,943	$750	-	NJ TRM	NJ TRM	NJ T2 Inc Cost
C&I	Core Utility	Prescriptive / Custom	Cold Climate DMS Heat Pump - C&I	15	645	0.36	0.83	$428	$750	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Exit Signs	15	138	0.02	0.53	$21	$10	(13.75)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED Fixture External	7	609	0.02	0.64	$433	$183	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED Fixture Internal	7	558	0.07	0.64	$421	$167	(5.01)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED Linear	5	163	0.02	0.58	$42	$49	(1.46)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED Reach in Refrig/Frzr Lights	16	117	0.02	0.58	$296	$35	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Lighting - Custom	15	85,288	9.74	0.53	$18,763	$25,587	-	Actuals	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Lighting - Other	15	85,288	9.74	0.53	$18,763	$25,587	-	Actuals	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Daylight & Occupancy)	8	1,363	0.33	0.62	$160	$409	(81.03)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Network)	8	862	0.21	0.69	$160	$259	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Linear Lamps - Mntnce-C&I	5	64	0.01	0.58	$199	$19	(0.58)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	High/Low Bays Lamps - Mntnce-C&I	7	1,072	0.14	0.64	$426	$322	(9.63)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED Fixture - Mntnce-C&I	5	291	0.04	0.58	$42	$87	(2.62)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Street & Area Lighting (Cust Owned)	7	631	0.02	0.64	$433	$189	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	LED to LED Conversion	15	8	0.00	0.53	$6	$2	-	-	-	-
C&I	Core Utility	Prescriptive / Custom	Anti Sweat Heater Controls	12	647	0.07	0.93	$357	$70	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Beverage Vending Machine - Controls	5	1,512	-	0.77	$271	$250	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Coffee Brewers	15	1,331	0.15	0.81	$200	$100	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Combination Oven	12	11,462	2.70	0.81	$2,512	$1,000	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Convection Oven	12	1,118	0.23	0.81	$989	$500	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Dishwasher - C&I	15	2,928	0.33	0.81	$882	$250	280.83	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Commercial Refrigerator - C&I	10	388	0.05	0.47	$554	$350	(7.19)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Commercial Freezer - C&I	12	889	0.11	0.47	$616	$350	(16.46)	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Fryers	12	1,876	0.39	0.81	$580	$350	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Griddles	12	3,649	0.76	0.81	$1,073	$500	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Hot Food Holding Cabinet	12	2,555	0.63	0.81	$1,038	$450	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Ice Machines	10	1,217	0.17	0.81	$355	$300	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Induction Warmer/Rethermalizer Well	15	400	0.05	0.81	$500	$125	-	Mfg Data	MA TRM	MA TRM
C&I	Core Utility	Prescriptive / Custom	Refrigerated Case Cover	5	857	-	0.93	$122	$125	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Steam Cookers	12	2,441	0.51	0.81	$2,719	$450	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Strip Curtains	4	12,407	1.42	0.93	$249	$200	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Auto Milker Takeoff	10	34	-	0.95	$0	$75	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Custom - Agricultural	15	9,842	1.12	0.95	$2,165	$3,149	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Dairy Refrigeration Tune-Up	1	181	-	0.95	$23,421	$175	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Dairy Scroll Compressor	4	1,188	0.14	0.95	$581	$550	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Dairy Vac Pump VSD Controls	15	8,023	0.73	0.95	$6,179	$1,750	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Engine Block Heater Timer	15	738	-	0.95	$27	$25	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	HE Ventilation Fans	15	1,629	0.35	0.95	$181	$75	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Heat Reclaimers	14	66	0.02	0.95	$268	$250	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	High Volume Low Speed Fans	15	895	0.14	0.95	$62	$500	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Livestock Waterer	10	460	-	0.95	$675	$450	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Low Pressure Irrigation	5	3	0.01	0.95	$7	$100	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Process Lighting - Agricultural	12	4,053	0.93	0.53	$44	$1,216	-	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Prescriptive / Custom	Custom - Compressed Air	13	84,935	9.70	0.77	$16,987	$27,179	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - HVAC Eqp & Controls	15	4,352	2.70	0.82	$1,369	$1,393	1,182.50	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - Process Improvement	15	133,250	15.21	0.77	$45,305	$42,640	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - Refrigeration	15	9,885	1.13	0.77	$5,041	$3,163	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - Data Processing Eqpmnt/Servers	13	2,896	0.38	0.77	$985	$927	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - Motors	15	1,262	0.23	0.77	$353	$404	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs < 10HP	15	5,979	1.12	0.65	$2,243	$1,913	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs > 10 HP	15	89,689	16.92	0.65	$8,532	$28,700	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Custom - Office Electronics/Systems/Cntrls	4	2,200	0.25	0.77	$1,000	$704	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Prescriptive / Custom	Audit & Education - C&I	0	-	-	-	$0	$15,000	-	N/A	N/A	N/A
C&I	Core Utility	Energy Solutions	Virtual / Monitor Based RCx	15	32,595	3.72	0.75	$9,778	$14,668	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	Retrocommissioning	8	398,714	91.03	0.75	$0	$239,229	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	Building Operation Training	9	48,200	1.95	0.95	$2,500	$1,000	725.00	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	Audit & Education - Rtrcom - C&I	0	-	-	-	$0	$15,000	-	N/A	N/A	N/A
C&I	Core Utility	Energy Solutions	Building Tune Up Large	15	137,286	43.57	0.75	$21,966	$82,371	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	Building Tune Up Small	15	68,643	21.79	0.75	$10,983	$41,186	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	HVAC Maintenance	5	414	0.23	0.75	$175	$400	-	Co Assumption	Co Assumption	Co Assumption
C&I	Core Utility	Energy Solutions	Audit & Education - BTUP - C&I	0	-	-	-	$0	$15,000	-	N/A	N/A	N/A
C&I	Core Utility	Energy Solutions	Strategic Energy Management	0	-	-	0.75	$0	$0	-	N/A	N/A	N/A
C&I	Core Utility	Energy Solutions	Virtual Strategic Energy Management	3	120,000	-	0.75	$50,000	$54,000	-	Vendor	Industry Stndrd	Vendor
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 1	18	210,193	29.77	0.90	$301,208	$136,625	27,619.10	EE Consultant	EE Consultant	EE Consultant
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 2	17	119,415	17.83	0.90	$135,645	$77,620	12,663.34	EE Consultant	EE Consultant	EE Consultant
Residential - DR	Additional Utility	Load Optimization & PDR	Load Control	1	-	0.85	1.00	$0	$121	-	Vendor	Industry Stndrd	Vendor
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2025	1	-	0.03	1.00	$0	$0	-	Vendor	Industry Stndrd	Vendor
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2026	1	-	0.03	1.00	$0	$0	-	Vendor	Industry Stndrd	Vendor
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2027	1	-	0.03	1.00	$0	$0	-	Vendor	Industry Stndrd	Vendor
C&I - DR	Additional Utility	Load Optimization & PDR	Load Control	1	-	0.85	1.00	$0	$121	-	Vendor	Industry Stndrd	Vendor

Appendix J, Table J-2: Measure Assumptions												
Sector	Program Type	Program	Measure	Measure Life	Verified kWh	Verified kW	NTG	Incremental Cost	Modeled Rebate	Gas Savings (Therms/Yr)	Source of Savings	Source of Measure Life	Source of Inc Cost
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	16	-	-	0.67	$1,521	$2,125	-	EE Consultant	EE Consultant	EE Consultant
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	15	-	-	0.71	$638	$11,156	-	EE Consultant	EE Consultant	EE Consultant
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to Geothermal Heat Pump	25	-	-	0.67	$4,243	$16,734	-	EE Consultant	EE Consultant	EE Consultant
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	10	-	-	0.78	$778	$2,550	-	EE Consultant	EE Consultant	EE Consultant
Residential-BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	0	-	-	-	$0	$4,250	-	N/A	N/A	N/A
Residential-BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	0	-	-	0.50	$0	$100,000	-	N/A	N/A	N/A
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Clothes Dryer to HP Clothes Dryer	12	-	-	0.58	$652	$2,125	-	EE Consultant	EE Consultant	EE Consultant
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	15	-	-	0.83	$651	$11,156	-	EE Consultant	EE Consultant	EE Consultant
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to Geothermal Heat Pump	15	-	-	0.83	$1,414	$16,734	-	EE Consultant	EE Consultant	EE Consultant
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	10	-	-	0.71	$1,285	$2,550	-	EE Consultant	EE Consultant	EE Consultant
C&I - BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	0	-	-	-	$0	$4,250	-	N/A	N/A	N/A
C&I - BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	0	-	-	0.50	$0	$100,000	-	N/A	N/A	N/A
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	16	-	-	0.67	$1,521	$2,125	-	EE Consultant	EE Consultant	EE Consultant
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	15	-	-	0.83	$651	$11,156	-	EE Consultant	EE Consultant	EE Consultant
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	10	-	-	0.71	$1,285	$2,550	-	EE Consultant	EE Consultant	EE Consultant
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	0	-	-	-	$0	$4,250	-	N/A	N/A	N/A
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	0	-	-	0.50	$0	$100,000	-	N/A	N/A	N/A
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Clothes Dryer to HP Clothes Dryer	12	-	-	0.58	$652	$2,125	-	EE Consultant	EE Consultant	EE Consultant
Other	Additional Utility	Next Generation Savings	Next Generation Savings	0	-	-	1.00	$0	$0	-	N/A	N/A	N/A
Other	Additional Utility	CVR	CVR	1	17,500,000	3,660.00	1.00	$0	$0	-	Co Assumption	Industry Stndrd	Co Assumption

Appendix J, Table J-3: Number of Measures/Participants												
Sector	Program Type	Program	Measure Name	Measures				Participants				
				2025	2026	2027	Total	2025	2026	2027	Total	
Residential	Core Utility	Energy Efficient Products	Freezer Recycling	550	1,029	1,043	2,622	440	823	834	2,098	
Residential	Core Utility	Energy Efficient Products	Refrigerator Recycling	2,755	5,119	5,188	13,062	2,204	4,095	4,150	10,450	
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner Recycling	360	679	688	1,727	288	543	550	1,382	
Residential	Core Utility	Energy Efficient Products	Dehumidifier Recycling	555	1,029	1,043	2,627	444	823	834	2,102	
Residential	Core Utility	Energy Efficient Products	Mini Refrigerator Recycling	49	91	93	233	39	73	74	186	
Residential	Core Utility	Energy Efficient Products	Clothes Washer	2,725	5,069	5,137	12,931	2,725	5,069	5,137	12,931	
Residential	Core Utility	Energy Efficient Products	Refrigerators	5,450	10,138	10,273	25,861	5,450	10,138	10,273	25,861	
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner	12,099	22,505	22,807	57,411	12,099	22,505	22,807	57,411	
Residential	Core Utility	Energy Efficient Products	Freezers	191	355	359	905	191	355	359	905	
Residential	Core Utility	Energy Efficient Products	Clothes Dryer	1,929	3,599	3,647	9,175	1,929	3,599	3,647	9,175	
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	1,090	2,028	2,054	5,172	1,090	2,028	2,054	5,172	
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	28,885	53,729	54,448	137,062	28,885	53,729	54,448	137,062	
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	447	831	842	2,120	447	831	842	2,120	
Residential	Core Utility	Energy Efficient Products	Dishwashers	44	81	83	208	44	81	83	208	
Residential	Core Utility	Energy Efficient Products	Water Coolers	1,123	2,088	2,116	5,327	1,123	2,088	2,116	5,327	
Residential	Core Utility	Energy Efficient Products	Elec Vehicle Chargers - Res	22	41	41	104	22	41	41	104	
Residential	Core Utility	Energy Efficient Products	Beverage Coolers	910	1,693	1,716	4,319	910	1,693	1,716	4,319	
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	12,644	23,519	23,833	59,996	12,644	23,519	23,833	59,996	
Residential	Core Utility	Energy Efficient Products	TVs	976	1,815	1,839	4,630	976	1,815	1,839	4,630	
Residential	Core Utility	Energy Efficient Products	Sound Bars	76	142	143	361	76	142	143	361	
Residential	Core Utility	Energy Efficient Products	Smart Home	1	1	1	3	1	1	1	3	
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	218	406	411	1,035	145	271	274	690	
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	2,736	5,089	5,157	12,982	547	1,018	1,031	2,596	
Residential	Core Utility	Energy Efficient Products	Ceiling Fans	1,439	2,676	2,712	6,827	1,439	2,676	2,712	6,827	
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	21,800	38,523	39,038	99,361	21,800	38,523	39,038	99,361	
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	382	710	719	1,811	382	710	719	1,811	
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	1	1	1	3	1	1	1	3	
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	2,998	5,373	5,445	13,816	2,998	5,373	5,445	13,816	
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	1	1	1	3	0	0	0	1	
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	164	228	231	623	164	228	231	623	
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	27	51	52	130	18	34	35	87	
Residential	Core Utility	Energy Efficient Products	Air Source Heat Pumps	164	304	309	777	164	304	309	777	
Residential	Core Utility	Energy Efficient Products	Central Air Conditioners	2,480	4,577	4,638	11,695	2,480	4,577	4,638	11,695	
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split Heat Pump	496	917	930	2,343	496	917	930	2,343	
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split A/C	55	101	103	259	55	101	103	259	
Residential	Core Utility	Energy Efficient Products	PTAC	55	96	98	249	55	96	98	249	
Residential	Core Utility	Energy Efficient Products	PTHP	76	137	138	351	76	137	138	351	
Residential	Core Utility	Energy Efficient Products	Heat Pump - Water & Geothermal	27	46	46	119	27	46	46	119	
Residential	Core Utility	Energy Efficient Products	Furnace Fans	49	86	88	223	49	86	88	223	
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	1,090	2,028	2,054	5,172	1,090	2,028	2,054	5,172	
Residential	Core Utility	Energy Efficient Products	HVAC - Tune Up	1	1	1	3	1	1	1	3	
Residential	Core Utility	Energy Efficient Products	Circulating Pump	27	51	52	130	27	51	52	130	
Residential	Core Utility	Energy Efficient Products	HE Bathroom Fans	3,161	5,880	5,959	15,000	3,161	5,880	5,959	15,000	
Residential	Core Utility	Energy Efficient Products	HVAC Quality Install	22	35	36	93	22	35	36	93	
Residential	Core Utility	Energy Efficient Products	Cold Climate Air Source Heat Pumps	60	106	108	274	60	106	108	274	
Residential	Core Utility	Energy Efficient Products	Cold Climate DMSHP	76	137	138	351	76	137	138	351	
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	27	51	52	130	27	51	52	130	
Residential	Core Utility	Whole Home	Comprehensive Retrofit	7,630	16,464	16,688	40,782	1,090	2,352	2,384	5,826	
Residential	Core Utility	Whole Home	Home Energy Assessment	337,900	729,090	738,850	1,805,840	33,790	72,909	73,885	180,584	
Residential	Core Utility	Income Qualified - MI Wx	MI Weatherization	3,206	6,916	7,014	17,136	458	988	1,002	2,448	
Residential	Core Utility	Income Qualified - MI Wx	Health & Safety Incentive	458	988	1,002	2,448	458	988	1,002	2,448	
Residential	Core Utility	Income Qualified - LI	Comfort Partners	3,206	6,916	7,014	17,136	458	988	1,002	2,448	
Residential	Core Utility	Income Qualified - LI	Health & Safety Incentive	458	988	1,002	2,448	458	988	1,002	2,448	

Appendix J, Table J-3: Number of Measures/Participants												
Sector	Program Type	Program	Measure Name	Measures				Participants				
				2025	2026	2027	Total	2025	2026	2027	Total	
Residential	Core Utility	Behavioral	Behavioral FY25	155,000	-	-	155,000	310,000	-	-	310,000	
Residential	Core Utility	Behavioral	Behavioral FY26	-	310,000	-	310,000	-	310,000	-	310,000	
Residential	Core Utility	Behavioral	Behavioral FY27	-	-	310,000	310,000	-	-	310,000	310,000	
Multifamily	Core Utility	Multifamily	Multifamily	24,500	53,250	54,000	131,750	98	213	216	527	
Multifamily	Core Utility	Multifamily	Multifamily - Engnrd Solutions	1,000	2,000	2,000	5,000	4	8	8	20	
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 1	17,200	42,560	43,120	102,880	430	1,064	1,078	2,572	
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 2	5,350	13,200	13,350	31,900	107	264	267	638	
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 3	3,120	8,220	8,280	19,620	52	137	138	327	
C&I	Core Utility	Prescriptive / Custom	Clothes Dryer - Consumer - C&I	16	30	62	108	16	30	62	108	
C&I	Core Utility	Prescriptive / Custom	Clothes Washer - Consumer- C&I	87	162	329	578	87	162	329	578	
C&I	Core Utility	Prescriptive / Custom	Dehumidifier - Consumer - C&I	65	122	247	434	65	122	247	434	
C&I	Core Utility	Prescriptive / Custom	EV Charging - C&I	33	61	123	217	33	61	123	217	
C&I	Core Utility	Prescriptive / Custom	Freezer - Consumer - C&I	65	122	247	434	65	122	247	434	
C&I	Core Utility	Prescriptive / Custom	Refrigerators - Consumer - C&I	65	122	123	310	65	122	123	310	
C&I	Core Utility	Prescriptive / Custom	Water Cooler - Consumer - C&I	65	122	123	310	65	122	123	310	
C&I	Core Utility	Prescriptive / Custom	Water Heater - Heat Pump - C&I	16	30	31	77	16	30	31	77	
C&I	Core Utility	Prescriptive / Custom	Freezer Recycling - C&I	1	1	1	3	1	1	1	2	
C&I	Core Utility	Prescriptive / Custom	Refrigerator Recycling - C&I	1	1	1	3	1	1	1	2	
C&I	Core Utility	Prescriptive / Custom	Room Air Conditioner Recycling - C&I	1	1	1	3	1	1	1	2	
C&I	Core Utility	Prescriptive / Custom	Dehumidifier Recycling - C&I	1	1	1	3	1	1	1	2	
C&I	Core Utility	Prescriptive / Custom	Mini Refrigerator Recycling - C&I	1	1	1	3	1	1	1	2	
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>5.4 < 20 Ton) - C&I	692	1,495	1,489	3,676	346	748	745	1,838	
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (<=5.4 Ton) - C&I	51	112	112	275	26	56	56	138	
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>=20 Ton) - C&I	33	68	69	170	17	34	35	85	
C&I	Core Utility	Prescriptive / Custom	Circulating Pump - C&I	665	1,434	1,454	3,553	333	717	727	1,777	
C&I	Core Utility	Prescriptive / Custom	DMS Heat Pump - C&I	98	218	221	537	49	109	111	269	
C&I	Core Utility	Prescriptive / Custom	Ductless Mini-Split A/C - C&I	4	8	8	20	2	4	4	10	
C&I	Core Utility	Prescriptive / Custom	Furnace Fans - C&I	11	22	23	56	6	11	12	28	
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 1 Ph)	11	22	23	56	6	11	12	28	
C&I	Core Utility	Prescriptive / Custom	Heat Pumps - Wtr & GeoT - C&I	16	39	39	94	8	20	20	47	
C&I	Core Utility	Prescriptive / Custom	PTAC - C&I	44	101	103	248	22	51	52	124	
C&I	Core Utility	Prescriptive / Custom	PTHP - C&I	9	20	21	50	5	10	11	25	
C&I	Core Utility	Prescriptive / Custom	Rm Air Condnr, Consumer - C&I	33	67	68	168	17	34	34	84	
C&I	Core Utility	Prescriptive / Custom	Smart Thermostat - C&I	872	1,936	1,963	4,771	436	968	982	2,386	
C&I	Core Utility	Prescriptive / Custom	Heat Pump - Cold Climate C&I (<=5.4 Ton, 1 Ph)	3	7	7	17	2	4	4	9	
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 3 Ph)	1	3	3	7	1	2	2	4	
C&I	Core Utility	Prescriptive / Custom	Cold Climate DMS Heat Pump - C&I	3	7	7	17	2	4	4	9	
C&I	Core Utility	Prescriptive / Custom	Exit Signs	812	1,440	1,459	3,711	6	10	10	27	
C&I	Core Utility	Prescriptive / Custom	LED Fixture External	5,417	9,651	9,780	24,848	39	69	70	177	
C&I	Core Utility	Prescriptive / Custom	LED Fixture Internal	823	1,465	1,485	3,773	6	10	11	27	
C&I	Core Utility	Prescriptive / Custom	LED Linear	175,599	312,585	316,768	804,952	1,254	2,233	2,263	5,750	
C&I	Core Utility	Prescriptive / Custom	LED Reach in Refrig/Frzr Lights	5,494	9,783	9,914	25,191	39	70	71	180	
C&I	Core Utility	Prescriptive / Custom	Lighting - Custom	1	1	1	3	1	1	1	3	
C&I	Core Utility	Prescriptive / Custom	Lighting - Other	1	1	1	3	1	1	1	3	
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Daylight & Occupancy)	9,450	16,879	17,105	43,434	68	121	122	310	
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Network)	202	355	359	916	1	3	3	7	
C&I	Core Utility	Prescriptive / Custom	Linear Lamps - Mntnce-C&I	46,870	83,356	84,471	214,697	335	595	603	1,534	
C&I	Core Utility	Prescriptive / Custom	High/Low Bays Lamps - Mntnce-C&I	1,777	3,163	3,205	8,145	13	23	23	58	
C&I	Core Utility	Prescriptive / Custom	LED Fixture - Mntnce-C&I	2,927	5,211	5,280	13,418	21	37	38	96	
C&I	Core Utility	Prescriptive / Custom	Street & Area Lighting (Cust Owned)	327	583	590	1,500	2	4	4	11	
C&I	Core Utility	Prescriptive / Custom	LED to LED Conversion	46,870	82,823	83,932	213,625	335	592	600	1,526	
C&I	Core Utility	Prescriptive / Custom	Anti Sweat Heater Controls	35	76	77	188	7	15	15	38	
C&I	Core Utility	Prescriptive / Custom	Beverage Vending Machine - Controls	13	28	29	70	13	28	29	70	

Appendix J, Table J-3: Number of Measures/Participants												
Sector	Program Type	Program	Measure Name	Measures				Participants				
				2025	2026	2027	Total	2025	2026	2027	Total	
C&I	Core Utility	Prescriptive / Custom	Coffee Brewers	4	9	9	22	4	9	9	22	
C&I	Core Utility	Prescriptive / Custom	Combination Oven	7	14	14	35	7	14	14	35	
C&I	Core Utility	Prescriptive / Custom	Convection Oven	5	12	12	29	5	12	12	29	
C&I	Core Utility	Prescriptive / Custom	Dishwasher - C&I	1	3	3	7	1	3	3	7	
C&I	Core Utility	Prescriptive / Custom	Commercial Refrigerator - C&I	85	182	185	452	85	182	185	452	
C&I	Core Utility	Prescriptive / Custom	Commercial Freezer - C&I	28	61	62	151	28	61	62	151	
C&I	Core Utility	Prescriptive / Custom	Fryers	11	24	25	60	11	24	25	60	
C&I	Core Utility	Prescriptive / Custom	Griddles	8	16	17	41	8	16	17	41	
C&I	Core Utility	Prescriptive / Custom	Hot Food Holding Cabinet	11	24	25	60	11	24	25	60	
C&I	Core Utility	Prescriptive / Custom	Ice Machines	13	27	28	68	13	27	28	68	
C&I	Core Utility	Prescriptive / Custom	Induction Warmer/Rethermalizer Well	13	28	29	70	13	28	29	70	
C&I	Core Utility	Prescriptive / Custom	Refrigerated Case Cover	273	608	616	1,497	55	122	123	299	
C&I	Core Utility	Prescriptive / Custom	Steam Cookers	9	20	21	50	9	20	21	50	
C&I	Core Utility	Prescriptive / Custom	Strip Curtains	382	831	842	2,055	382	831	842	2,055	
C&I	Core Utility	Prescriptive / Custom	Auto Milker Takeoff	191	416	421	1,028	38	83	84	206	
C&I	Core Utility	Prescriptive / Custom	Custom - Agricultural	1	2	2	5	1	2	2	5	
C&I	Core Utility	Prescriptive / Custom	Dairy Refrigeration Tune-Up	3	6	6	15	3	6	6	15	
C&I	Core Utility	Prescriptive / Custom	Dairy Scroll Compressor	3	8	8	19	3	8	8	19	
C&I	Core Utility	Prescriptive / Custom	Dairy Vac Pump VSD Controls	3	6	6	15	3	6	6	15	
C&I	Core Utility	Prescriptive / Custom	Engine Block Heater Timer	4	10	10	24	2	5	5	12	
C&I	Core Utility	Prescriptive / Custom	HE Ventilation Fans	14	31	32	77	14	31	32	77	
C&I	Core Utility	Prescriptive / Custom	Heat Reclaimers	1	3	3	7	1	3	3	7	
C&I	Core Utility	Prescriptive / Custom	High Volume Low Speed Fans	3	6	6	15	3	6	6	15	
C&I	Core Utility	Prescriptive / Custom	Livestock Waterer	3	6	6	15	1	1	1	3	
C&I	Core Utility	Prescriptive / Custom	Low Pressure Irrigation	1	3	3	7	0	1	1	1	
C&I	Core Utility	Prescriptive / Custom	Process Lighting - Agricultural	2,055	4,587	4,648	11,290	15	33	33	81	
C&I	Core Utility	Prescriptive / Custom	Custom - Compressed Air	5	12	12	29	4	10	10	23	
C&I	Core Utility	Prescriptive / Custom	Custom - HVAC Eqp & Controls	22	47	47	116	18	38	38	93	
C&I	Core Utility	Prescriptive / Custom	Custom - Process Improvement	16	36	37	89	13	29	30	71	
C&I	Core Utility	Prescriptive / Custom	Custom - Refrigeration	16	36	37	89	13	29	30	71	
C&I	Core Utility	Prescriptive / Custom	Custom - Data Processing Eqpmnt/Servers	51	109	111	271	26	55	56	136	
C&I	Core Utility	Prescriptive / Custom	Custom - Motors	23	49	50	122	12	25	25	61	
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs < 10HP	56	122	123	301	19	41	41	100	
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs > 10 HP	12	27	28	67	6	14	14	34	
C&I	Core Utility	Prescriptive / Custom	Custom - Office Electronics/Systems/Cntrls	2	6	6	14	1	4	4	9	
C&I	Core Utility	Prescriptive / Custom	Audit & Education - C&I	45	90	90	225	45	90	90	225	
C&I	Core Utility	Energy Solutions	Virtual / Monitor Based RCx	55	137	138	330	55	137	138	330	
C&I	Core Utility	Energy Solutions	Retrocommissioning	33	86	88	207	33	86	88	207	
C&I	Core Utility	Energy Solutions	Building Operation Training	115	253	257	625	58	127	129	313	
C&I	Core Utility	Energy Solutions	Audit & Education - Rtrcom - C&I	45	90	90	225	45	90	90	225	
C&I	Core Utility	Energy Solutions	Building Tune Up Large	4,060	7,840	7,910	19,810	58	112	113	283	
C&I	Core Utility	Energy Solutions	Building Tune Up Small	8,200	15,200	15,450	38,850	164	304	309	777	
C&I	Core Utility	Energy Solutions	HVAC Maintenance	403	745	755	1,903	101	186	189	476	
C&I	Core Utility	Energy Solutions	Audit & Education - BTUP - C&I	45	90	90	225	45	90	90	225	
C&I	Core Utility	Energy Solutions	Strategic Energy Management	-	-	-	-	-	-	-	-	
C&I	Core Utility	Energy Solutions	Virtual Strategic Energy Management	11	30	31	72	11	30	31	72	
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 1	1,040	2,800	2,880	6,720	13	35	36	84	
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 2	1,200	3,050	3,100	7,350	24	61	62	147	
Residential - DR	Additional Utility	Load Optimization & PDR	Load Control	25,000	33,145	42,000	100,145	25,000	33,145	42,000	100,145	
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2025	-	-	-	-	-	-	-	-	
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2026	-	150,000	-	150,000	-	150,000	-	150,000	
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2027	-	-	300,000	300,000	-	-	300,000	300,000	
C&I - DR	Additional Utility	Load Optimization & PDR	Load Control	2,000	3,000	4,000	9,000	2,000	3,000	4,000	9,000	

Appendix J, Table J-3: Number of Measures/Participants												
Sector	Program Type	Program	Measure Name	Measures				Participants				
				2025	2026	2027	Total	2025	2026	2027	Total	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	10	40	40	90	10	40	40	90	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	20	80	80	180	20	80	80	180	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to Geothermal Heat Pump	2	8	8	18	2	8	8	18	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	20	80	80	180	20	80	80	180	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	40	160	160	360	40	160	160	360	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
Residential-BD	Additional Utility	Building Decarbonization - Rebate	FF Clothes Dryer to HP Clothes Dryer	10	40	40	90	10	40	40	90	
Residential-BD	Additional Utility	Building Decarbonization - DI	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	20	80	80	180	20	80	80	180	
Residential-BD	Additional Utility	Building Decarbonization - DI	FF Frnce to ASHP	150	600	600	1,350	150	600	600	1,350	
Residential-BD	Additional Utility	Building Decarbonization - DI	FF Frnce to Geothermal Heat Pump	10	40	40	90	10	40	40	90	
Residential-BD	Additional Utility	Building Decarbonization - DI	FF DHW to HPWH	40	160	160	360	40	160	160	360	
Residential-BD	Additional Utility	Building Decarbonization - DI	Wiring Upgrade (Service, Panel, Circuits etc.)	150	600	600	1,350	150	600	600	1,350	
Residential-BD	Additional Utility	Building Decarbonization - DI	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
Residential-BD	Additional Utility	Building Decarbonization - DI	FF Clothes Dryer to HP Clothes Dryer	20	80	80	180	20	80	80	180	
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	15	60	60	135	15	60	60	135	
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to Geothermal Heat Pump	2	8	8	18	2	8	8	18	
C&I - BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	5	20	20	45	5	20	20	45	
C&I - BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	15	60	60	135	15	60	60	135	
C&I - BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
C&I - BD	Additional Utility	Building Decarbonization - DI	FF Frnce to ASHP	15	60	60	135	15	60	60	135	
C&I - BD	Additional Utility	Building Decarbonization - DI	FF Frnce to Geothermal Heat Pump	2	8	8	18	2	8	8	18	
C&I - BD	Additional Utility	Building Decarbonization - DI	FF DHW to HPWH	5	20	20	45	5	20	20	45	
C&I - BD	Additional Utility	Building Decarbonization - DI	Wiring Upgrade (Service, Panel, Circuits etc.)	15	60	60	135	15	60	60	135	
C&I - BD	Additional Utility	Building Decarbonization - DI	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	3	10	10	23	3	10	10	23	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Frnce to ASHP	3	10	10	23	3	10	10	23	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF DHW to HPWH	10	40	40	90	10	40	40	90	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	Wiring Upgrade (Service, Panel, Circuits etc.)	12	50	50	112	12	50	50	112	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
Multifamily - BD	Additional Utility	Building Decarbonization - Rebate	FF Clothes Dryer to HP Clothes Dryer	3	10	10	23	3	10	10	23	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	3	10	10	23	3	10	10	23	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	FF Frnce to ASHP	3	12	12	27	3	12	12	27	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	FF DHW to HPWH	10	40	40	90	10	40	40	90	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	Wiring Upgrade (Service, Panel, Circuits etc.)	12	50	50	112	12	50	50	112	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	Efficient Electric Conversion	1	1	1	3	1	1	1	3	
Multifamily - BD	Additional Utility	Building Decarbonization - DI	FF Clothes Dryer to HP Clothes Dryer	3	10	10	23	3	10	10	23	
Other	Additional Utility	Next Generation Savings	Next Generation Savings	-	-	-	-	-	-	-	-	
Other	Additional Utility	CVR	CVR	-	-	-	-	-	-	-	-	

Program Year 4 ("PY4") is the six month period of January 1, 2025-June 30, 2025 per the October 25 Board Order

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
Residential	Core Utility	Energy Efficient Products	Freezer Recycling	An existing working unit generally older than 10 years. Excludes compact freezers per NJ TRM.
Residential	Core Utility	Energy Efficient Products	Refrigerator Recycling	An existing working unit generally older than 10 years. Excludes compact refrigerators per NJ TRM.
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner Recycling	An existing working unit generally older than 10 years.
Residential	Core Utility	Energy Efficient Products	Dehumidifier Recycling	An existing working unit generally older than 10 years or meeting the requirements of the NJ TRM.
Residential	Core Utility	Energy Efficient Products	Mini Refrigerator Recycling	An existing working compact unit generally older than 10 years
Residential	Core Utility	Energy Efficient Products	Clothes Washer	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Refrigerators	ENERGY STAR or CEE Tier 2 or Tier 3 specification
Residential	Core Utility	Energy Efficient Products	Room Air Conditioner	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Freezers	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Clothes Dryer	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	ENERGY STAR or program specifications
Residential	Core Utility	Energy Efficient Products	Dishwashers	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Water Coolers	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	Elec Vehicle Chargers - Res	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Beverage Coolers	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	NJ TRM
Residential	Core Utility	Energy Efficient Products	TVs	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	Sound Bars	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Smart Home	ENERGY STAR, NJ EM&V Team
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	Wall, fixture, or remote-mounted occupancy sensor for interior or common area applications.
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	LED holiday lights meeting NJ TRM requirements replacing traditional incandescent holiday lights
Residential	Core Utility	Energy Efficient Products	Ceiling Fans	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	Smart Strip Plug Outlets	NJ TRM

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	ENERGY STAR or program specifications
Residential	Core Utility	Energy Efficient Products	Air Purifier / Cleaner	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	LED Holiday Lights	LED holiday lights meeting NJ TRM requirements replacing traditional incandescent holiday lights
Residential	Core Utility	Energy Efficient Products	Dehumidifiers	ENERGY STAR and NJ TRM
Residential	Core Utility	Energy Efficient Products	Residential Occupancy Sensors	Wall, fixture, or remote-mounted occupancy sensor for interior or common area applications.
Residential	Core Utility	Energy Efficient Products	Air Source Heat Pumps	Single Package or Split System central unit that exeeds codes requirements, NJ TRM, or program specifications. Includes variable flow (VRF) systems.
Residential	Core Utility	Energy Efficient Products	Central Air Conditioners	Central Air Conditioner that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split Heat Pump	Mini-Split Heat Pump that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	Ductless Mini-Split A/C	Mini-Split A/C that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	PTAC	PTAC that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	PTHP	PTHP that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	Heat Pump - Water & Geothermal	Ground Loop (Geothermal) heat pump that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	Furnace Fans	Replacement of an existing fan with a brushless permanent magnet (BPM) or electrically commutated motor (ECM), or NJ TRM.
Residential	Core Utility	Energy Efficient Products	Smart Thermostat	ENERGY STAR
Residential	Core Utility	Energy Efficient Products	HVAC - Tune Up	NJ TRM
Residential	Core Utility	Energy Efficient Products	Circulating Pump	A circulating pump in a single-family home space heating application that is driven by a variable speed electronically commutated (EC) high-efficiency brushless DC motor with controls capable of producing flow rates that match system heating requirements.
Residential	Core Utility	Energy Efficient Products	HE Bathroom Fans	NJ TRM
Residential	Core Utility	Energy Efficient Products	HVAC Quality Install	Proper sizing techniques including Manual J calculations, following of ENERGY STAR HVAC Quality Installation procedures, or similar calculations.
Residential	Core Utility	Energy Efficient Products	Cold Climate Air Source Heat Pumps	Single Package or Split System central unit that exeeds codes requirements, NJ TRM, or program specifications. Includes variable flow (VRF) systems.
Residential	Core Utility	Energy Efficient Products	Cold Climate DMSHP	Mini-Split Heat Pump that exceeds code requirements, NJ TRM, or program specifications
Residential	Core Utility	Energy Efficient Products	Water Heater - Heat Pump	ENERGY STAR or program specifications
Residential	Core Utility	Whole Home	Comprehensive Retrofit	In-Home Audit w/ direct install measures which meets requirements of ENERGY STAR and the NJ TRM. Also provides incentive for comprehensive measures including but not limited to: Windows, Duct Sealing, and Wall & Attic Insulation, Smart Thermostats etc.
Residential	Core Utility	Whole Home	Home Energy Assessment	In-Home Audit w/ direct install measures. Eligible to single family home customers.
Residential	Core Utility	Income Qualified - MI Wx	MI Weatherization	In-Home Audit for qualifying customers w/ direct install measures. Also provides incentive for comprehensive measures including but not limited to: Windows, Duct Sealing, and Wall & Attic Insulation, etc.
Residential	Core Utility	Income Qualified - MI Wx	Health & Safety Incentive	Program specification for incentive
Residential	Core Utility	Income Qualified - LI	Comfort Partners	In-Home Audit for qualifying customers w/ direct install measures. Also provides incentive for comprehensive measures including but not limited to: Windows, Duct Sealing, and Wall & Attic Insulation, etc.

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
Residential	Core Utility	Income Qualified - LI	Health & Safety Incentive	Program specification for incentive
Residential	Core Utility	Behavioral	Behavioral FY25	Residential customer meeting program requirements
Residential	Core Utility	Behavioral	Behavioral FY26	Residential customer meeting program requirements
Residential	Core Utility	Behavioral	Behavioral FY27	Residential customer meeting program requirements
Multifamily	Core Utility	Multifamily	Multifamily	Provides Whole Building Audit w/ direct install measures which meets requirements of ENERGY STAR and the NJ TRM. Also provides incentive for comprehensive measures including but not limited to: Windows, Duct Sealing, and Wall & Attic Insulation, Smart Thermostats etc.
Multifamily	Core Utility	Multifamily	Multifamily - Engnrd Solutions	Provides tailored energy-efficiency assistance using customized energy solutions to multi-family buildings. Energy efficiency improvements that are eligible include, but not limited to: lighting, HVAC, motors and drives, refrigeration, appliances, bulding shell, etc.
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 1	Audit w/ direct install measures. Also provides incentive with direct installation of comprehensive measures including measures meeting program specifications, NJ TRM, or evaluation requirements.
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 2	Audit w/ direct install measures. Also provides incentive with direct installation of comprehensive measures including measures meeting program specifications, NJ TRM, or evaluation requirements.
C&I	Core Utility	Direct Install	Audits w DI - CI - Tier 3	Audit w/ direct install measures. Also provides incentive with direct installation of comprehensive measures including measures meeting program specifications, NJ TRM, or evaluation requirements.
C&I	Core Utility	Prescriptive / Custom	Clothes Dryer - Consumer - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Clothes Washer - Consumer- C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Dehumidifier - Consumer - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	EV Charging - C&I	Level 2 - 240 volts EV Supply Equipment at public or commercial location.
C&I	Core Utility	Prescriptive / Custom	Freezer - Consumer - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Refrigerators - Consumer - C&I	ENERGY STAR or CEE Tier 2 or Tier 3 specification
C&I	Core Utility	Prescriptive / Custom	Water Cooler - Consumer - C&I	ENERGY STAR
C&I	Core Utility	Prescriptive / Custom	Water Heater - Heat Pump - C&I	ENERGY STAR or program specifications
C&I	Core Utility	Prescriptive / Custom	Freezer Recycling - C&I	An existing working unit generally older than 10 years. Excludes compact freezers per NJ TRM.
C&I	Core Utility	Prescriptive / Custom	Refrigerator Recycling - C&I	An existing working unit generally older than 10 years. Excludes compact refrigerators per NJ TRM.
C&I	Core Utility	Prescriptive / Custom	Room Air Conditioner Recycling - C&I	An existing working unit generally older than 10 years.
C&I	Core Utility	Prescriptive / Custom	Dehumidifier Recycling - C&I	An existing working unit generally older than 10 years or meeting the requirements of the NJ TRM.
C&I	Core Utility	Prescriptive / Custom	Mini Refrigerator Recycling - C&I	An existing working compact unit generally older than 10 years
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>5.4 < 20 Ton) - C&I	Single Package or Split System central unit that exceeds codes requirements, NJ TRM requirements, or program specifications. Includes variable flow (VRF) systems.
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (<=5.4 Ton) - C&I	ENERGY STAR, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Air Conditioning (>=20 Ton) - C&I	Single Package or Split System central unit that exceeds code requirements, NJ TRM requirements or program specifications. Includes variable flow (VRF) systems.
C&I	Core Utility	Prescriptive / Custom	Circulating Pump - C&I	A circulating pump in a space heating application that is driven by a variable speed electronically commutated (EC) high-efficiency brushless DC motor with controls capable of producing flow rates that match system heating requirements.

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
C&I	Core Utility	Prescriptive / Custom	DMS Heat Pump - C&I	Mini-Split Heat Pump that exceeds code requirements, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Ductless Mini-Split A/C - C&I	Mini-Split A/C Unit that exceeds code requirements, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Furnace Fans - C&I	Replacement of an existing fan with a brushless permanent magnet (BPM) or electrically commutated motor (ECM).
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 1 Ph)	ENERGY STAR, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Heat Pumps - Wtr & GeoT - C&I	Ground water source or ground source heat pump system that meets or exceeds code requirments, NJ TRM, or program specifiations.
C&I	Core Utility	Prescriptive / Custom	PTAC - C&I	PTAC that exceeds code requirements, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	PTHP - C&I	PTHP that exceeds code requirements, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Rm Air Condnr, Consumer - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Smart Thermostat - C&I	ENERGY STAR
C&I	Core Utility	Prescriptive / Custom	Heat Pump - Cold Climate C&I (<=5.4 Ton, 1 Ph)	ENERGY STAR, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Heat Pump C&I (<=5.4 Ton, 3 Ph)	ENERGY STAR, NJ TRM or program specifications
C&I	Core Utility	Prescriptive / Custom	Cold Climate DMS Heat Pump - C&I	Mini-Split Heat Pump that exceeds code requirements, NJ TRM, or program specifications
C&I	Core Utility	Prescriptive / Custom	Exit Signs	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED Fixture External	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED Fixture Internal	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED Linear	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED Reach in Refrig/Frzr Lights	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	Lighting - Custom	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.
C&I	Core Utility	Prescriptive / Custom	Lighting - Other	ENERGY STAR, DLC, NJ TRM, or program specification
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Daylight & Occupancy)	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.
C&I	Core Utility	Prescriptive / Custom	Lighting Controls (Network)	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.
C&I	Core Utility	Prescriptive / Custom	Linear Lamps - Mntnce-C&I	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	High/Low Bays Lamps - Mntnce-C&I	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED Fixture - Mntnce-C&I	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	Street & Area Lighting (Cust Owned)	ENERGY STAR, Design Lights Consortium (DLC) listed or NJ TRM
C&I	Core Utility	Prescriptive / Custom	LED to LED Conversion	Replacement of linear LED lighting equipment to a higher efficiency linear LED lighting equipment. ENERGY STAR, DLC, or NJ TRM.

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
C&I	Core Utility	Prescriptive / Custom	Anti Sweat Heater Controls	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.
C&I	Core Utility	Prescriptive / Custom	Beverage Vending Machine - Controls	NJ TRM
C&I	Core Utility	Prescriptive / Custom	Coffee Brewers	Replacement or new installation of an Energy Star Type II small, medium or large coffee brewer.
C&I	Core Utility	Prescriptive / Custom	Combination Oven	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Convection Oven	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Dishwasher - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Commercial Refrigerator - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Commercial Freezer - C&I	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Fryers	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Griddles	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Hot Food Holding Cabinet	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Ice Machines	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Induction Warmer/Rethermalizer Well	Replacement or new installation of an energy efficient Rethermalizer & Food Warmers.
C&I	Core Utility	Prescriptive / Custom	Refrigerated Case Cover	NJ TRM
C&I	Core Utility	Prescriptive / Custom	Steam Cookers	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Strip Curtains	Replacement or new installation of polyethylene strip curtains (minimum of .06 in thick) on walk in freezers and coolers covering the entire door fame. Eligible units must be open a least 2.5 hrs./day.
C&I	Core Utility	Prescriptive / Custom	Auto Milker Takeoff	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).
C&I	Core Utility	Prescriptive / Custom	Custom - Agricultural	Replacement or retrofit of existing agricultural growing/harvesting type equipment or process changes or enhancements that results in electric energy savings. Grow house/indoor agriculture process also qualify under this measure.
C&I	Core Utility	Prescriptive / Custom	Dairy Refrigeration Tune-Up	Inspection and tune up of refrigeration equipment associated with a commercial-grade dairy farm facility by a U.S. EPA 608 Certified Service Provider, NJ TRM
C&I	Core Utility	Prescriptive / Custom	Dairy Scroll Compressor	Replacement of a reciprocating compressor with a scroll compressor for milk cooling
C&I	Core Utility	Prescriptive / Custom	Dairy Vac Pump VSD Controls	VFD and controls on dairy vacuum pumps, or dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible for this measure.
C&I	Core Utility	Prescriptive / Custom	Engine Block Heater Timer	Engine block heater timer on existing farm equipment.
C&I	Core Utility	Prescriptive / Custom	HE Ventilation Fans	High speed, high efficiency ventilation fans installed in agricultural applications.
C&I	Core Utility	Prescriptive / Custom	Heat Reclaimers	Heat reclaim units on dairy parlor milk refrigeration systems. Addition of heat reclaimer on new milk refrigeration system also qualifies under this measure.
C&I	Core Utility	Prescriptive / Custom	High Volume Low Speed Fans	High Volume Low Speed (HVLS) fans meeting program requirements, or NJ TRM
C&I	Core Utility	Prescriptive / Custom	Livestock Waterer	Energy efficient livestock waterer that is thermostatically controlled and has a minimum of two inches of factory-installed insulation.

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
C&I	Core Utility	Prescriptive / Custom	Low Pressure Irrigation	Low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.
C&I	Core Utility	Prescriptive / Custom	Process Lighting - Agricultural	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes. Requires pre-approval by the program.
C&I	Core Utility	Prescriptive / Custom	Custom - Compressed Air	New installation of new or replacement or retrofit of existing air compressor systems, including but no limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as: leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible. Retrofit of compressor with a VFD is also eligible.
C&I	Core Utility	Prescriptive / Custom	Custom - HVAC Eqp & Controls	New or retrofit of HVAC controls/controllers that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.
C&I	Core Utility	Prescriptive / Custom	Custom - Process Improvement	Replacement or retrofit of existing equipment, process changes or process enhancements that results in more energy efficient usage or electric energy.
C&I	Core Utility	Prescriptive / Custom	Custom - Refrigeration	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to: high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.
C&I	Core Utility	Prescriptive / Custom	Custom - Data Processing Eqpmnt/Servers	New or retrofit of existing data processing equipment or servers that result in the more efficient use of electric energy.
C&I	Core Utility	Prescriptive / Custom	Custom - Motors	New premium efficiency motor as a direct replacement or early replacement.
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs < 10HP	New VFD for an existing motor (less than 10 hp) driving fans, pumps and other suitable applications. VFD retrofits are not eligible, and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Custom - VFDs > 10 HP	New VFD for an existing motor (greater than 10 hp but less than or equal to 50 HP) driving fans, pumps and other suitable applications. VFD retrofits are not eligible, and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Custom - Office Electronics/Systems/Cntrls	ENERGY STAR and NJ TRM
C&I	Core Utility	Prescriptive / Custom	Audit & Education - C&I	Comprehensive Energy Audit for facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, process improvements, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.
C&I	Core Utility	Energy Solutions	Virtual / Monitor Based RCx	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment.
C&I	Core Utility	Energy Solutions	Retrocommissioning	Adjusting electrical, electro-mechanical, mechanical and control system set points to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through building operations training.
C&I	Core Utility	Energy Solutions	Building Operation Training	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.
C&I	Core Utility	Energy Solutions	Audit & Education - Rtrcom - C&I	Comprehensive Energy Audit for facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, process improvements, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.
C&I	Core Utility	Energy Solutions	Building Tune Up Large	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.
C&I	Core Utility	Energy Solutions	Building Tune Up Small	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.
C&I	Core Utility	Energy Solutions	HVAC Maintenance	Provides for tune-up of commercial HVAC unit following NJ TRM guidelines.
C&I	Core Utility	Energy Solutions	Audit & Education - BTUP - C&I	Comprehensive Energy Audit for facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, process improvements, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.
C&I	Core Utility	Energy Solutions	Strategic Energy Management	Assessment of energy usage performance over time, using meter data, analytics and building modeling, including ongoing direct customer engagement and reporting, to support ongoing energy saving strategies and initiatives involving building operations, systems and equipment.
C&I	Core Utility	Energy Solutions	Virtual Strategic Energy Management	Virtual assessment of energy usage performance over time, using meter data, remote analytics and building modeling, including virtual customer engagement and reporting, to support ongoing energy saving strategies and initiatives involving building operations, systems and equipment.
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 1	Provides tailored comprehensive energy-efficiency assistance using customized energy solutions to customers. Energy efficiency improvements that are eligible include, but not limited to: lighting, HVAC, motors and drives, refrigeration, appliances, building shell, building systems etc.
C&I	Core Utility	Energy Solutions	ESB - Engineered Solutions - 2	Provides tailored energy-efficiency assistance using customized energy solutions to customers. Energy efficiency improvements that are eligible include, but not limited to: lighting, HVAC, motors and drives, refrigeration, appliances, building shell, building systems etc.

Appendix J, Table J-4: Measure Eligibility				
Sector	**Program Type**	**Program**	**Measure Name**	**Energy Efficiency Eligibility / Description**
Residential - DR	Additional Utility	Load Optimization & PDR	Load Control	Direct control of a residential customer's smart thermostat, or other in home connected devices meeting program requirements to reduce energy consumption, optimize energy usage and control peak demand.
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2025	Residential customer with AMI and meeting program requirements
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2026	Residential customer with AMI and meeting program requirements
Residential - DR	Additional Utility	Load Optimization & PDR	Behavioral Demand Response 2027	Residential customer with AMI and meeting program requirements
C&I - DR	Additional Utility	Load Optimization & PDR	Load Control	Direct control of a business customer's smart thermostat, or other connected devices meeting program requirements to reduce energy consumption, optimize energy usage and control peak demand.
Residential-BD	Additional Utility	Building Decarbonization	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	Induction cooking equipment meeting program specification, replacing a fossil unit.
Residential-BD	Additional Utility	Building Decarbonization	FF Frnce to ASHP	ASHP that exceeds code requirements, NJ TRM, or program specifications, replacing a fossil fuel furnace.
Residential-BD	Additional Utility	Building Decarbonization	FF Frnce to Geothermal Heat Pump	Ground Loop (Geothermal) and air-to-water heat pump that exceeds code requirements, NJ TRM or program specifications, replacing a fossil fuel furnace
Residential-BD	Additional Utility	Building Decarbonization	FF DHW to HPWH	ENERGY STAR or Program Specification Heat Pump Water Heater replacing an existing fossil fuel water heater
Residential-BD	Additional Utility	Building Decarbonization	Wiring Upgrade (Service, Panel, Circuits etc.)	Program specification for incentive
Residential-BD	Additional Utility	Building Decarbonization	Efficient Electric Conversion	Program specification for incentive
Residential-BD	Additional Utility	Building Decarbonization	FF Clothes Dryer to HP Clothes Dryer	Purchase and installation of a electric clothes dryer meeting or exceeding ENERGY STAR specifications and NJ TRM requirements replacing a fossil fuel clothes dryer.
C&I - BD	Additional Utility	Building Decarbonization	FF Frnce to ASHP	ASHP that exceeds code requirements, NJ TRM, or program specifications, replacing a fossil fuel furnace.
C&I - BD	Additional Utility	Building Decarbonization	FF Frnce to Geothermal Heat Pump	Ground Loop (Geothermal) and air-to-water heat pump that exceeds code requirements, NJ TRM or program specifications, replacing a fossil fuel furnace
C&I - BD	Additional Utility	Building Decarbonization	FF DHW to HPWH	ENERGY STAR or Program Specification Heat Pump Water Heater replacing an existing fossil fuel water heater
C&I - BD	Additional Utility	Building Decarbonization	Wiring Upgrade (Service, Panel, Circuits etc.)	Program specification for incentive
C&I - BD	Additional Utility	Building Decarbonization	Efficient Electric Conversion	Program specification for incentive
Multifamily - BD	Additional Utility	Building Decarbonization	FF Cooking to Induction Cooking (Cooktop, Wok, Stock Pot)	Induction cooking equipment meeting program specification, replacing a fossil unit.
Multifamily - BD	Additional Utility	Building Decarbonization	FF Frnce to ASHP	ASHP that exceeds code requirements, NJ TRM, or program specifications, replacing a fossil fuel furnace.
Multifamily - BD	Additional Utility	Building Decarbonization	FF DHW to HPWH	ENERGY STAR or Program Specification Heat Pump Water Heater replacing an existing fossil fuel water heater
Multifamily - BD	Additional Utility	Building Decarbonization	Wiring Upgrade (Service, Panel, Circuits etc.)	Program specification for incentive
Multifamily - BD	Additional Utility	Building Decarbonization	Efficient Electric Conversion	Program specification for incentive
Multifamily - BD	Additional Utility	Building Decarbonization	FF Clothes Dryer to HP Clothes Dryer	Clothes dryer meeting ENERGY STAR and NJ TRM requirements replacing a fossil fuel clothes dryer.
Other	Additional Utility	Next Generation Savings	Next Generation Savings	Program specification
Other	Additional Utility	CVR	CVR	Recalibration of voltage set points for select Company distribution substations and circuits to deliver a lower voltage while meeting all regulatory voltage requirements.

Attachment B
Public Version

Workpapers for EE&C Plan II

- EE Model (CONFIDENTIAL)
- Table Appendix Workpapers (CONFIDENTIAL)

EXHIBIT JC-3

BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES

In The Matter Of The Verified Petition Of Jersey Central Power & Light Company For Approval Of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs ("JCP&L EE&C Plan II Filing")

BPU Docket No. _____

Direct Testimony
Of
Carol Pittavino

On Behalf Of
Jersey Central Power & Light Company

December 1, 2023

EXHIBIT JC-3

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I. INTRODUCTION AND BACKGROUND

Q. Please state your name and business address.

A. My name is Carol Pittavino and my business address is 800 Cabin Hill Drive, Greensburg, PA 15601.

Q. By whom are you currently employed and in what capacity?

A. I am currently employed by FirstEnergy Service Company and my job title is Manager in the Rates & Regulatory Affairs Department for Jersey Central Power & Light Company ("JCP&L" or the "Company"). I report to Mark A. Mader, New Jersey Director of Rates & Regulatory Affairs. My principal responsibilities are to provide financial and analytical support to JCP&L.

Q. Please provide your prior employment experience and your qualifications.

A. I have been employed with FirstEnergy since August 2012. In August 2012, I was employed by JCP&L as a Rates Analyst. From November 2017 to January 2019, I held an analyst position in the FirstEnergy Transmission Business Services area, while continuing to support Rates and Regulatory Affairs. In January 2019, I returned to JCP&L's Rates and Regulatory Affairs Department as a Rates Consultant.

From October 2003 to September 2010, I was employed by Allegheny Energy, Inc. as a Senior Accountant in the Regulatory Accounting Department. One of my primary responsibilities was Federal Energy Regulatory Commission Form 1 preparation and analysis. I also performed general accounting responsibilities and performed forecasting preparation for the regulated subsidiary entities owned by Allegheny Energy, Inc. In addition, I assisted the Rate Department with a base rate case filing and prepared the revenue requirement calculation on transmission line construction projects.

I was employed at United Health Group from October 2010 to July 2012 as a Senior Accountant. I was responsible for the oversight and accounting functions of two Medicaid managed care organizations.

From May 2001 through September 2003, I was employed at S.R. Snodgrass as a Senior Accountant. S.R. Snodgrass is a regional public accounting firm which performs external and internal audit services for their clients. I functioned as an external auditor assisting in the drafting and inspection of the financial records of clients, which ultimately resulted in issuing an opinion on their financial records.

From June 1985 through April 2001, I was employed for the First National Bank of Herminie. I held various positions when I was employed by the bank. I progressed through all aspects of branch operations which resulted in my being promoted to Branch Manager. I transferred into the finance department as an accountant and functioned in this capacity until the bank was acquired by the First National Bank of Pennsylvania in April 2001.

I graduated from Seton Hill University (then College) in May 2000 with a Bachelor of Science degree with a major in accounting. I earned my Pennsylvania Certified Public Accountant license in September 2003.

Q. Have you previously testified in New Jersey Board of Public Utilities ("BPU" or "Board") proceedings?

A. Yes. On behalf of JCP&L, I have submitted direct, supplemental, and rebuttal testimony in the Company's 2012 base rate case in BPU Docket No. ER12111052; direct testimony in the Company's 2016 base rate case in BPU Docket No. ER16040383; direct testimony in the Company's 2020 base rate case in BPU Docket No. ER20020146; and direct and

supplemental direct testimony in the Company's 2023 base rate case in BPU Docket No. ER23030144. I have also submitted direct testimony in support of the Company's Verified Petitions for approval of its Advanced Metering Infrastructure Program in BPU Docket No. EO20080545; its Energy Efficiency and Conservation Plan including Energy Efficiency and Peak Demand Reduction Programs ("EE&C Plan I") in BPU Docket No. EO20090620; and rate adjustments pursuant to its Reliability Plus Infrastructure Investment Program in BPU Docket No. ER19091238.

Q. Please describe the purpose of your direct testimony.

A. JCP&L is requesting the Board's approval of its Second Triennium of Energy Efficiency and Peak Demand Reduction Programs ("EE&C Plan II" or the "Plan"), which consist of a portfolio of Energy Efficiency ("EE"), Peak Demand Reduction ("PDR"), and Building Decarbonization ("BD") Programs. In my direct testimony, I will address the revenue requirements calculation, the proposed recovery methodology for recovery of EE&C Plan II costs, bill impacts, the proposal for recovery of lost revenues, and the tariff rate for the Plan.

My testimony provides detailed schedules setting forth the proposed revenue requirements, tariff rate, and projected bill impacts of the Plan for the 2.5-year program period from January 1, 2025 through June 30, 2027 ("Triennium 2").

Q. Are you sponsoring any schedules in connection with your direct testimony?

A. Yes. I am presenting the following schedules, which have been prepared under my direction and supervision and are accurate and complete to the best of my knowledge and belief.

Schedule CAP-1 – Weighted Average Cost of Capital ("WACC")

Schedule CAP-2 – Detailed Program Capital and Operations and Maintenance Expense Schedule

Schedule CAP-3 – Revenue Requirements Schedule

Schedule CAP-4 – Proposed Rate Calculation

Schedule CAP-5 – Bill Impact Summary

Schedule CAP-6 – Lost Revenue Adjustment Mechanism ("LRAM") Calculation

Schedule CAP-7 – Proposed Tariff Sheet for Rider Regional Greenhouse Gas Initiative Recovery Charge ("RRC")

Schedule CAP-8 – Proposed Tariff Sheet for Rider LRAM

Schedule CAP-9 – Pro Forma Balance Sheet and Income Statement

Q. Please briefly describe JCP&L's proposed cost recovery methodology.

A. JCP&L is proposing to recover EE&C Plan II costs in a manner that is consistent with the BPU-approved cost recovery for the Company's EE&C Plan I. The Company will recover its EE&C Plan II revenue requirements through the EE&C2 component set forth in Rider RRC, which is Schedule CAP-7 to my testimony. The Company will recover lost revenues from reduced electricity sales associated with the Plan through Rider LRAM, which is Schedule CAP-8 to my testimony.

II. REVENUE REQUIREMENTS

Q. Please summarize JCP&L's proposed cost recovery program.

A. JCP&L is proposing to recover the revenue requirement associated with the costs of EE&C Plan II. Such costs include all planned investments and expenses related to the Plan. More specifically, investment costs include: customer incentives, outside services, and financing investments. Expenses include operations and maintenance ("O&M"), which are related to expenses for utility administration, inspections and quality control, workforce development, marketing, and evaluation. The revenue requirement will be modified by any net revenue offsets from PJM Interconnection LLC ("PJM") capacity resources,

marketplace revenues negotiated with vendors, financial benefits from the usage of data, or any other source of revenues resulting from the Plan's implementation.

Q. Please describe the type of expenditures to be included in Rate Base.

A. Rate Base will include all the financing investment balances and program investments associated with EE&C Plan II, including customer incentives and outside services.

Q. How does JCP&L propose to calculate the revenue requirements on a monthly basis?

A. In accordance with the BPU's April 27, 2021 Order approving EE&C Plan I (the "April 27 Order"),[1] JCP&L proposes to calculate the revenue requirements associated with EE&C Plan II costs using the following formula:

Revenue Requirements = [(Pre-Tax Cost of Capital × Rate Base) + Amortization + O&M Expense - Revenue Offsets]

- "Pre-Tax Cost of Capital" = JCP&L's pre-tax, overall WACC for the Plan based on the capital structure established in the Company's most recent base rate case, incorporating both the cost of debt and the return on equity ("ROE") including income tax effects.
- Rate Base = Cumulative Investments – Accumulated Amortization of Investments – Accumulated Deferred Income Tax ("ADIT").
- Amortization = Recovery of Plan investments, consisting of customer incentives and outside services, based on a ten-year amortization of such investments.

[1] *See I/M/O The Verified Petition of Jersey Central Power & Light Company for Approval of JCP&L's Energy Efficiency and Conservation Plan Including Energy and Peak Demand Reduction Programs (JCP&L EE&C)*, Docket Nos. QO19010040, EO20090620, Order Adopting Stipulation (April 27, 2021), pp. 9-10.

- O&M Expense = Expenses for utility administration, inspections and quality control, workforce development, marketing, and evaluation required to conduct the Plan.
- Revenue Offsets = PJM capacity market revenues, marketplace revenues negotiated with vendors, financial benefits from the usage of data, or any other source of revenue resulting from the Plan's implementation credited as a reduction to revenue requirements.

The Company will also apply the appropriate factor to collect applicable New Jersey Sales and Use Tax ("SUT").

Q. Please describe the components of JCP&L's proposed revenue requirement calculation.

A. The "Pre-Tax Cost of Capital × Rate Base" component provides recovery of the return ***on*** EE&C Plan II, which includes customer incentives, outside services, and financing investments in rate base. Again, the term "Pre-Tax Cost of Capital" means JCP&L's pre-tax, overall WACC for the Plan. Pursuant to the Board's July 26, 2023 Order in this matter (the "July 26 Order"), carrying costs for program investments should use the capital structure established in JCP&L's most recent base rate case, incorporating both the cost of debt and the ROE.[2] Accordingly, the Company proposes to earn a return on rate base associated with the Plan, based upon the Company's current authorized ROE and capital structure including income tax effects. The Company's initial WACC for the Program will be based on the ROE, long-term debt, and capital structure approved by the Board on October 28, 2020, in the Company's 2020 base rate case, BPU Docket No. ER20020146.

[2] *See* July 26 Order, Attachment A, at p. 32.

The Company proposes the initial pre-tax WACC to be 9.34 percent. *See* Schedule CAP-1 for the calculation of the current pre-tax and after-tax WACC. Any change in the WACC authorized by the Board in a base rate case following this filing, including the case pending in BPU Docket No. ER23030144, will be reflected in the revenue requirement calculations and subsequent rate adjustment filings for Rider RRC. Any changes to current tax rates will be reflected in an adjustment to the WACC.

The term "Rate Base" refers to cumulative investments less the associated accumulated amortization less ADIT. In accordance with the April 27 Order, cumulative investments include all plan-to-date investments, such as customer incentives, outside services, and financing investments. A summary of the projected investments can be found in Schedule CAP-2.

ADIT is calculated as book amortization less the amount of the investment recognized for tax purposes (*i.e.*, expensed), multiplied by the statutory composite federal and state income tax rate, which is currently 28.11%. Any future changes to the book amortization or income tax rates during the EE&C Plan II period and at the time of each rate adjustment will be reflected in the accumulated amortization and/or ADIT calculation described above. All Plan investments in rate base will be expensed in the year of investment for tax purposes.

The "Amortization" component provides for recovery of the Company's plan customer incentives and outside services investments. In accordance with the Board's April 27 Order (pp. 9-10), the amortization expense is based on a ten-year amortization of

Plan investments.[3] Amortization for ratemaking purposes will be done monthly, using a straight-line method. The current month's amortization will be included in the current month's revenue requirement and will also reduce the current month's cumulative investment.

The term "O&M Expense" means expenses for utility administration, inspections and quality control, workforce development, marketing, and evaluation required to conduct EE&C Plan II. In accordance with the April 27 Order, O&M Expense associated with the Plan is to be expensed and included in a utility's annual cost recovery petition. An annual summary of the projected O&M Expense can be found in CAP-2. The annual detail supporting the O&M Expense for the Plan can be found in Appendix B of the Plan.

The term "Revenue Offsets" encompasses PJM capacity market revenues (net of costs associated with auction participation, including but not limited to replacement capacity charges, capacity deficiency charges, and any unavoidable PJM charges), marketplace revenues negotiated with vendors, financial benefits from the usage of data, or any other source of revenue resulting from the Plan's implementation, which are credited as a reduction to revenue requirements. For example, Revenue Offsets include revenues from program measures that are offered in the PJM Reliability Base Residual Auction ("BRA") or subsequent Incremental Auctions ("IAs"), where program measures are eligible to be offered and such offers are deemed appropriate by the Company.[4] All BRA

[3] For context, the Board's July 26 Order states: "Most program investments will be amortized over a time period that aligns with the weighted average useful life of each utility's proposed portfolio but this period should not exceed 10 years. However, the parties to each utility filing and stakeholders are allowed to explore shorter amortization periods to align with the State's energy policy goals, as set forth in the EMP and Executive Orders 316 and 317." July 26 Order, Attachment A, at p. 31.

[4] The Company's proposal for offering resources in the BRA and IAs is discussed in the testimony of Edward C. Miller and Section 4.0 of the Plan.

and IAs proceeds, net of the costs associated with participation in the BRA and IAs and unavoidable PJM charges, will be credited in the Revenue Requirement.

Uncollectible expense associated with the Plan is not included in the Revenue Requirement because it will be recovered along with other uncollectible expenses in existing Rider Uncollectible Accounts Charge.

Q. Does the Company's proposed Rate Base investment for EE&C Plan II include any new components as compared to what the Company currently recovers for EE&C Plan I?

A. Yes, for EE&C Plan II, JCP&L will begin utilizing the Company's capital to fund low- to no-interest loans for qualifying customer investments in EE and BD projects. Therefore, for EE&C Plan II, the proposed revenue requirement includes a return on the outstanding loan principal, whereas the return during EE&C Plan I was on the cost of the interest rate buy-down. Consistent with other Rate Base items, the Revenue Requirement calculates the return using the WACC approved in the last base rate case. As stated above, any changes to the WACC will be adopted in any subsequent rate adjustment filings for Rider RRC.

Q. Has the Company included an adjustment to the WACC for performance incentives or penalties in its definition of WACC in the formula above?

A. No, not at this time. JCP&L acknowledges that the July 26 Order (p. 34) approves Board Staff's recommendations for performance incentives and penalties, which take the form of a ROE adjustment applied to Rate Base resulting from EE and PDR investments. However, the Board also adopted the recommendation that incentives or penalties would not be

applied until after the conclusion of Program Year ("PY") 5 based on PY5 performance. Accordingly, no performance-related adjustments are appropriate at this time.

Q. Will any of the EE&C Plan II expenditures be eligible for Allowance for Funds Used During Construction?

A. No.

Q. Is there a witness sponsoring the Investments and O&M Expense used to calculate the Revenue Requirements?

A. Yes. The projected Plan expenditures are sponsored by Company witness Edward C. Miller and set forth in Appendix B to the Plan.

Q. Have you provided a schedule showing the calculation of the revenue requirements?

A. Yes. *See* Schedule CAP-3 for a calculation of EE&C Plan II revenue requirements for Triennium 2, which I have calculated based on the forecasted costs to be incurred during various periods provided by Mr. Miller in Appendix B to the Plan.

III. COST RECOVERY MECHANISM

Q. How does the Company propose to recover the Revenue Requirements as described above?

A. Consistent with the April 27 Order related to EE&C Plan I, JCP&L will recover the Revenue Requirements associated with the Plan through a separate component via its tariff Rider RRC. This is consistent with the July 26 Order (Attachment A, p. 31), which quotes N.J.S.A. 87.9(e)(1) and directs each utility to "file 'to recover on a full and current basis through a surcharge all reasonable and prudent costs incurred' as a result of the EE and PDR programs, 'including but not limited to recovery of and on capital investment . . . .'" So as to provide recovery on a full and current basis, the Company will fix an initial tariffed

rate effective January 1, 2025 based on estimated Revenue Requirements for the period January 1, 2025 through June 30, 2025, and, thereafter, will make rate adjustment filings on an annual basis. The projected effective date for the initial tariff is based on the date for commencement of the Plan on January 1, 2025. Consistent with the Company's existing Rider RRC and the April 27 Order, the RRC would be subject to annual adjustment filings on February 1 for all Rider RRC components with rates effective July 1 of each year. Each rate filing will address the prior year true-up for actuals and the projected revenue requirement for the subsequent recovery period to set the new rate. The actual expenditures included in the true-up will also reflect the total net costs associated with revenues received from and paid to partner gas utilities from the delivery of coordinated programs. The first reconciliation period will be performed to compare the actual revenues received from customers with the actual recovered costs for the period January 1, 2025 through June 30, 2025, with the (over)/under collection reflected in the current year's rate calculation. In addition, the Company will accrue interest monthly on the over or under recovered balance of such costs calculated based upon the average balance, net of tax, at an interest rate equal to the rate on two-year constant maturity Treasuries, as published in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty basis points, compounded annually as of January 1 of each year. The calculation of the estimated proposed rate adjustments for each period from January 1, 2025 through June 30, 2027 are shown in Schedule CAP-4.

Q. Has the Company proposed a schedule for rate filings to adjust the rates in Rider RRC?

A. Yes. Attachment A of the July 26 Order (pp. 30-31) provides that each utility shall file an annual petition no later than 150 days following the end of each PY to demonstrate compliance with the EE, PDR, and BD performance targets, and for cost recovery of the programs, including any performance incentives or penalties, consistent with the Minimum Filing Requirements ("MFRs"). The Company's proposed schedule for annual rate filings is listed below.

JCP&L EE&C Plan Rate Filing Schedule				
Filing	**Filing (On or Before)**	**Projected Spending Through**	**True-Up of Prior Period Actuals**	**Rates Effective**
0 (Initial Rate)	This Petition	June 30, 2025	N/A	January 1, 2025
1	February 1, 2025	June 30, 2026	January 1, 2024 through December 31, 2024	July 1, 2025
2	February 1, 2026	June 30, 2027	January 1, 2025 through December 31, 2025	July 1, 2026

The Company will continue annual filings on the above schedule while Plan programs remain in effect. Under the proposed schedule, changes to the rates in Rider RRC would occur once per year, following the above-identified filings with the Board.

Q. Will the BPU have an opportunity to review the actual Plan expenditures?

A. Yes. As addressed above, following BPU approval of EE&C Plan II, JCP&L will make annual filings in a process that resets rates to: (1) provide refunds or adjustments to reconcile the projected Revenue Requirements for the prior period to actual Revenue

Requirements based on actual Plan costs, and (2) recover projected Plan costs for the prospective period. The BPU will have the opportunity to review each rate filing and conduct discovery.

Q. What is the projected Revenue Requirement for the initial rate recovery period?

A. The Revenue Requirement is currently forecasted to be $16,192,427, including SUT, for the initial rate period of January 1, 2025 through June 30, 2025. *See* Schedule CAP-4.

Q. What rate design is the Company proposing to use for the EE&C2 component of Rider RRC?

A. Consistent with the EE&C component of Rider RRC approved by the Board in the April 27 Order, the Company is proposing to utilize a dollar per kilowatt-hour ("kWh") consumption charge that is applicable to all rate schedules. The detailed calculations supporting the initial rates (in Rider RRC) are shown in Schedules CAP-3 and CAP-4. In addition, Schedule CAP-4 provides a summary of the proposed rates for all forecasted rate filings.

IV. BILL IMPACTS

Q. What are the estimated bill impacts of EE&C Plan II on the typical residential customer?

A. The estimated bill impacts for a typical residential customer as well as rate class average for the period January 1, 2025 through June 30, 2027, based upon the proposed rates shown in Schedule CAP-4 and the projected revenue requirements provided in Schedule CAP-3, are set forth in Schedule CAP-5. For the typical residential customer who uses 783 kWh per month on average, the estimated initial bill increase is $0.97, or 0.8% a month, effective January 1, 2025, including SUT.

A summary of bill impact on a typical residential customer for each year of the Plan through Triennium 2 compared to the current average monthly bill is shown in the following chart.

	Typical Residential Customer on RS Rate			
		Effective January 1, 2025	Effective July 1, 2025	Effective July 1, 2026
	Current Monthly Bill (1)	Proposed Monthly Bill (2)	Proposed Monthly Bill (2)	Proposed Monthly Bill (2)
Residential (RS) using 783 kW per Month	$116.88	$117.85	$119.42	$121.74
Incremental Increase ($)		$0.97	$1.57	$2.32
% of Incremental Increase		0.8%	1.3%	1.9%
Cumulative Increase from Current ($)		$0.97	$2.54	$4.86
Cumulative Increase from Current (%)		0.8%	2.2%	4.2%

{1} Rates effective 10/1/2023

{2} Proposed EE rates at respective dates, all other rates remain the same, includes NJ SUT

The maximum cumulative bill impact on a typical residential customer using 783 kWh per month over the entire 2.5-year program period is an estimated increase of approximately $4.86 or about 4.2% from the current average monthly bill.

V. TARIFF RIDER

Q. Does the Company propose a modification to its tariff as part of this filing?

A. Yes. Consistent with the Company's recovery of EE&C Plan I costs, JCP&L proposes to recover its costs for EE&C Plan II through rates set forth in a separate EE&C component of its Rider RRC. Specifically, the Company is proposing to add a new "EE&C2" component to Rider RRC, as shown in the attached Schedule CAP-7. The attached Rider includes the initial tariffed rates proposed to commence on January 1, 2025.

In addition, and also consistent with EE&C Plan I, the Company proposes to recover its lost revenues related to EE&C Plan II through Rider LRAM. The proposed Rider LRAM tariff is shown in Schedule CAP-8.

VI. LOST REVENUE RECOVERY MECHANISM

Q. How does the Company propose to recover lost revenues?

A. As noted in Attachment A to the July 26 Order (p. 31), N.J.S.A. 87.9(e)(1) provides that a utility may file for the recovery of, among other things, the "'revenue impact of sales losses resulting from implementation' of [EE and PDR] programs . . . ." In accordance, Attachment A to the July 26 Order (p. 32) permits utilities to propose either a LRAM or a Conservation Incentive Program. JCP&L proposes to continue using an LRAM for recovery of lost revenues.

Q. How does JCP&L's proposed LRAM operate?

A. Schedule CAP-6 is an illustrative calculation of lost revenue based on target gross savings from January 1, 2025 to June 30, 2027. JCP&L proposes that it recover lost distribution revenue from lost sales in all PYs using the same Lost Revenue Recovery Mechanism approved in the April 27 Order and file approximately three to six months after the end of each program year, using actual verified savings when available.

Q. Will the recovery of lost revenues through the LRAM be subject to an earnings test?

A. Yes, the Company will employ the same earnings test that was approved by the BPU in the April 27 Order. If the ROE, as calculated by the method described below, exceeds the allowed ROE from the utility's last base rate case by 50 basis points or more, recovery of lost revenues through the LRAM will not be allowed for the applicable filing period. The earnings test methodology previously approved by the Board is as follows: "the Company's rate of return on common equity shall be calculated by dividing the Company's net income for the applicable period by the Company's average common equity balance (average of the beginning and ending common equity balances) for the same period. The Company's

net income shall be calculated by subtracting from distribution operating income, any clause related net income, and interest expenses. The Company's average common equity balances shall be the ratio of Electric Distribution Net Plant (including the Electric Distribution allocation of common plant) to total Net Plant for the average common equity balance period multiplied by the Company's total common equity for the same period." "In addition, the parties further agree that an adjustment to the earnings calculation for pension and [Other Post Employment Benefits ("OPEB")] expense will be made using the following steps: (1) remove the pension and OPEB mark-to market gains/losses, recorded by JCP&L; and (2) include the recalculated amount of the most recent 12-month test year pension and OPEB expense by amortizing the net accumulated actuarial loss over future periods using the delayed recognition method."[5] The EE&C earnings test includes an accounting adjustment for pension and OPEB for ratemaking purposes that is consistent with the recommendations of the Administrative Law Judge and the BPU determinations in the Company's 2012 base rate case and as filed in its 2016 & 2020 base rate cases.[6]

Q. If the Board approves the proposed LRAM, does the Company agree to file a base rate case not later than five years after the commencement of EE&C Plan II?

A. Yes, assuming the Board approves the Company's proposed LRAM, JCP&L agrees to file a base rate case not later than five years after commencement of its approved EE&C Plan II, or by January 1, 2030, if the Plan commences January 1, 2025.

[5] April 27 Order, Attachment J to Stipulation of Settlement.

[6] In 2011, FirstEnergy Corp. and its subsidiaries (including JCP&L), under Statement of Financial Accounting Standards No. 87, "Employer's Accounting for Pensions," elected to change the method by which it accounted for pension and OPEB expense whereby actuarial gains and losses—representing the change in value of plan assets or obligations—are recognized immediately in earnings (referred to as "mark-to market accounting" or "immediate recognition") as opposed to its previous method, which amortized those costs into earnings over a future period (referred to as "delayed recognition"). For ratemaking purposes, JCP&L uses the delayed recognition method.

VII. ADDITIONAL FILING INFORMATION

Q. Does the Company propose a method for treatment of renewable energy credits ("RECs")?

A. The Company does not anticipate that the energy savings from EE&C Plan II will be eligible for RECs and/or solar renewable energy credits due to the nature of the Plan programs. Accordingly, that portion of the MFRs is inapplicable to the Company's Plan.

Q. Are there any additional items included with this filing?

A. Yes, MFR IV (July 26 Order, Attachment A, p. 44) requires the provision of pro forma income statements for the proposed program(s) for each of the first three years of operations and actual or estimated balance sheets at the beginning and end of each year of the three-year period. These documents are provided in Schedule CAP-9. In addition, MFR IV also requests the debits and credits associated with the accounting treatment of the EE&C recovery. This information is provided in Appendix G to the Petition. Finally, MFR I.c. (July 26 Order, Attachment A, p. 42) requires each utility to provide accounts and account numbers that shall be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs. The account numbers are provided in Schedule CAP-3.

VIII. CONCLUSION

Q. Does this conclude your pre-filed direct testimony at this time?

A. Yes, although I reserve the right to supplement this testimony should further information arise.

Jersey Central Power & Light **Schedule CAP-1**

Clean Energy Energy Efficiency Program

Weighted Average Cost of Capital (WACC)

	Percent	Cost	Weighted Cost	Tax Multiplier	Pre-Tax Weighted Cost	Discount Rate
Long Term Debt	48.56%	5.083%	2.47%	1.00000	2.47%	
Common Equity	51.44%	9.600%	4.94%	1.39101	6.87%	4.94%
Total	100.0%		7.41%		9.34%	6.71%
Monthly WACC			0.617%		**0.778%**	
Federal and State Income Tax rate		28.11%				

Jersey Central Power & Light
Detailed Program Capital and
Operations and Maintenance Expense
Schedule

Yearly Budget

Program Year	EE&C Customer Incentives	EE&C Outside Services	EE&C Financing Investments	EE&C Total Investments	EE&C Total O & M Expense
2025	$ 204,478,082	$ 68,127,344	$ 57,849,485	$ 330,454,911	$ 14,982,552
2026	255,862,772	78,472,678	70,849,647	405,185,096	16,575,964
2027	262,081,430	81,160,688	71,968,654	415,210,773	16,908,136
Total	$ 722,422,284	$ 227,760,710	$ 200,667,786	$ 1,150,850,780	$ 48,466,652

* Program year 7/1 to 6/30

Investment Month	EE&C Customer Incentives	EE&C Outside Services*	EE&C Financing Investments	EE&C Total Investments	EE&C Total O & M Expenses
Jul-24	$ 17,039,840	$ 5,677,279	$ 4,820,790	$ 27,537,909	$ 1,248,546
Aug-24	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Sep-24	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Oct-24	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Nov-24	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Dec-24	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Jan-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Feb-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Mar-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Apr-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
May-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Jun-25	17,039,840	5,677,279	4,820,790	27,537,909	1,248,546
Jul-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Aug-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Sep-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Oct-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Nov-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Dec-25	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Jan-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Feb-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Mar-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Apr-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
May-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Jun-26	21,321,898	6,539,390	5,904,137	33,765,425	1,381,330
Jul-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Aug-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Sep-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Oct-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Nov-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Dec-26	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Jan-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Feb-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011

Jersey Central Power & Light
Detailed Program Capital and
Operations and Maintenance Expense
Schedule

Yearly Budget

	EE&C				
Program Year	Customer Incentives	Outside Services	Financing Investments	Total Investments	Total O & M Expense
2025	$ 204,478,082	$ 68,127,344	$ 57,849,485	$ 330,454,911	$ 14,982,552
2026	255,862,772	78,472,678	70,849,647	405,185,096	16,575,964
2027	262,081,430	81,160,688	71,968,654	415,210,773	16,908,136
Total	$ 722,422,284	$ 227,760,710	$ 200,667,786	$ 1,150,850,780	$ 48,466,652

* Program year 7/1 to 6/30

	EE&C				
Investment Month	Customer Incentives	Outside Services*	Financing Investments	Total Investments	Total O & M Expenses
Mar-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Apr-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
May-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Jun-27	21,840,119	6,763,391	5,997,388	34,600,898	1,409,011
Total	$ 722,422,284	$ 227,760,710	$ 200,667,786	$ 1,150,850,780	$ 48,466,652

Jersey Central Power & Light
Clean Energy Energy Efficiency Program
Electric Revenue Requirements Calculation

Program Investment Amortization	Years	10
Monthly WACC Effective 7/1/21		0.77812%
Federal & State Income tax rate		28.11%

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
Investment Month	Customer Incentives FERC (182)	Outside Services FERC (182)	Total Monthly Investments FERC (182)	Financing Balance Investments FERC (182)	Cumulative Investments FERC (182)	Customer Incentives Amortization FERC (407)	Outside Services Amortization FERC (407)	Accumulated Amortization FERC (407)	Net Investments (1) + (2) +(4) - (8)	Tax Amortization (3) + (4)	Book Amortization Tax Basis (4) + (6) +(7)	Deferred Income Tax FERC (283)	Beginning Accumulated Deferred Income Tax (12) + (13)	Ending Accumulated Deferred Income Tax (12) + (14)	Rate Base (9) - (14)	Return Component (15) x WACC	O & M Expenses FERC (923)
Jan-25	$ 17,370,175	$ 6,212,275	$ 23,582,449	$ 2,746,584	$ 26,329,033	$ 144,751	$ 51,769	$ 196,520	$ 26,132,512	$ 26,329,033	$ 2,943,104	$ 6,573,785	$ -	$ 6,573,785	$ 19,558,728	$ 152,191	$ 1,319,175
Feb-25	17,370,175	6,212,275	23,582,449	5,447,391	$ 52,612,289	289,503	103,538	589,561	$ 52,022,728	$ 29,029,840	$ 5,840,432	6,518,543	6,573,785	13,092,327	38,930,401	302,926	1,319,175
Mar-25	17,370,175	6,212,275	23,582,449	8,102,422	$ 78,849,769	434,254	155,307	1,179,122	$ 77,670,647	$ 31,684,871	$ 8,691,983	6,463,301	13,092,327	19,555,628	58,115,019	452,206	1,319,175
Apr-25	17,370,175	6,212,275	23,582,449	10,711,676	$ 105,041,473	579,006	207,076	1,965,204	$ 103,076,269	$ 34,294,125	$ 11,497,758	6,408,059	19,555,628	25,963,687	77,112,582	600,030	1,319,175
May-25	17,370,175	6,212,275	23,582,449	13,275,154	$ 131,187,400	723,757	258,845	2,947,806	$ 128,239,594	$ 36,857,603	$ 14,257,756	6,352,817	25,963,687	32,316,504	95,923,090	746,399	1,319,175
Jun-25	17,370,175	6,212,275	23,582,449	15,792,856	$ 157,287,551	868,509	310,614	4,126,929	$ 153,160,623	$ 39,375,305	$ 16,971,978	6,297,575	32,316,504	38,614,079	114,546,543	891,312	1,319,175
Jul-25	18,963,415	5,993,705	24,957,120	18,264,781	$ 184,716,597	1,026,537	360,561	5,514,027	$ 179,202,570	$ 43,221,901	$ 19,651,879	6,625,533	38,614,079	45,239,612	133,962,957	1,042,395	1,363,772
Aug-25	18,963,415	5,993,705	24,957,120	20,690,930	$ 212,099,866	1,184,566	410,509	7,109,102	$ 204,990,764	$ 45,648,050	$ 22,286,004	6,567,071	45,239,612	51,806,683	153,184,081	1,191,959	1,363,772
Sep-25	18,963,415	5,993,705	24,957,120	23,071,302	$ 239,437,358	1,342,594	460,456	8,912,152	$ 230,525,206	$ 48,028,422	$ 24,874,353	6,508,609	51,806,683	58,315,292	172,209,914	1,340,004	1,363,772
Oct-25	18,963,415	5,993,705	24,957,120	25,405,898	$ 266,729,075	1,500,623	510,404	10,923,178	$ 255,805,896	$ 50,363,018	$ 27,416,925	6,450,147	58,315,292	64,765,439	191,040,457	1,486,528	1,363,772
Nov-25	18,963,415	5,993,705	24,957,120	27,694,718	$ 293,975,014	1,658,651	560,351	13,142,181	$ 280,832,833	$ 52,651,838	$ 29,913,720	6,391,685	64,765,439	71,157,124	209,675,709	1,631,533	1,363,772
Dec-25	18,963,415	5,993,705	24,957,120	29,937,761	$ 321,175,178	1,816,679	610,299	15,569,159	$ 305,606,018	$ 54,894,881	$ 32,364,740	6,333,223	71,157,124	77,490,347	228,115,671	1,775,019	1,363,772
Jan-26	18,963,415	5,993,705	24,957,120	35,343,506	$ 351,538,042	1,974,708	660,247	18,204,114	$ 333,333,928	$ 60,300,626	$ 37,978,460	6,274,761	77,490,347	83,765,108	249,568,821	1,941,950	1,363,772
Feb-26	18,963,415	5,993,705	24,957,120	40,649,999	$ 381,801,656	2,132,736	710,194	21,047,044	$ 360,754,612	$ 65,607,119	$ 43,492,929	6,216,299	83,765,108	89,981,407	270,773,205	2,106,946	1,363,772
Mar-26	18,963,415	5,993,705	24,957,120	45,857,241	$ 411,966,018	2,290,765	760,142	24,097,951	$ 387,868,068	$ 70,814,362	$ 48,908,148	6,157,837	89,981,407	96,139,243	291,728,824	2,270,007	1,363,772
Apr-26	18,963,415	5,993,705	24,957,120	50,965,233	$ 442,031,130	2,448,793	810,089	27,356,833	$ 414,674,297	$ 75,922,353	$ 54,224,115	6,099,375	96,139,243	102,238,618	312,435,679	2,431,131	1,363,772
May-26	18,963,415	5,993,705	24,957,120	55,973,973	$ 471,996,990	2,606,822	860,037	30,823,692	$ 441,173,299	$ 80,931,093	$ 59,440,831	6,040,913	102,238,618	108,279,530	332,893,768	2,590,320	1,363,772
Jun-26	18,963,415	5,993,705	24,957,120	60,883,462	$ 501,863,600	2,764,850	909,984	34,498,526	$ 467,365,074	$ 85,840,582	$ 64,558,297	5,982,451	108,279,530	114,261,981	353,103,093	2,747,573	1,363,772
Jul-26	19,310,789	6,155,987	25,466,777	65,693,701	$ 532,140,615	2,925,773	961,284	38,385,584	$ 493,755,031	$ 91,160,477	$ 69,580,758	6,066,059	114,261,981	120,328,040	373,426,991	2,905,718	1,383,664
Aug-26	19,310,789	6,155,987	25,466,777	70,404,688	$ 562,318,379	3,086,697	1,012,584	42,484,865	$ 519,833,514	$ 95,871,465	$ 74,503,969	6,006,403	120,328,040	126,334,443	393,499,071	3,061,904	1,383,664
Sep-26	19,310,789	6,155,987	25,466,777	75,016,424	$ 592,396,892	3,247,620	1,063,884	46,796,369	$ 545,600,524	$ 100,483,201	$ 79,327,928	5,946,747	126,334,443	132,281,190	413,319,333	3,216,129	1,383,664
Oct-26	19,310,789	6,155,987	25,466,777	79,528,909	$ 622,376,154	3,408,543	1,115,184	51,320,096	$ 571,056,059	$ 104,995,686	$ 84,052,636	5,887,091	132,281,190	138,168,282	432,887,777	3,368,396	1,383,664
Nov-26	19,310,789	6,155,987	25,466,777	83,942,144	$ 652,256,165	3,569,466	1,166,484	56,056,046	$ 596,200,119	$ 109,408,920	$ 88,678,094	5,827,435	138,168,282	143,995,717	452,204,402	3,518,703	1,383,664
Dec-26	19,310,789	6,155,987	25,466,777	88,256,127	$ 682,036,925	3,730,390	1,217,784	61,004,219	$ 621,032,706	$ 113,722,904	$ 93,204,300	5,767,779	143,995,717	149,763,496	471,269,210	3,667,050	1,383,664
Jan-27	19,310,789	6,155,987	25,466,777	92,538,155	$ 711,785,730	3,891,313	1,269,084	66,164,616	$ 645,621,114	$ 118,004,931	$ 97,698,551	5,708,124	149,763,496	155,471,620	490,149,494	3,813,962	1,383,664
Feb-27	19,310,789	6,155,987	25,466,777	96,719,810	$ 741,434,162	4,052,236	1,320,383	71,537,235	$ 669,896,927	$ 122,186,587	$ 102,092,430	5,648,468	155,471,620	161,120,088	508,776,839	3,958,905	1,383,664
Mar-27	19,310,789	6,155,987	25,466,777	100,801,093	$ 770,982,222	4,213,159	1,371,683	77,122,078	$ 693,860,144	$ 126,267,869	$ 106,385,935	5,588,812	161,120,088	166,708,899	527,151,244	4,101,881	1,383,664
Apr-27	19,310,789	6,155,987	25,466,777	104,782,003	$ 800,429,908	4,374,083	1,422,983	82,919,144	$ 717,510,765	$ 130,248,780	$ 110,579,069	5,529,156	166,708,899	172,238,055	545,272,710	4,242,888	1,383,664
May-27	19,310,789	6,155,987	25,466,777	108,662,540	$ 829,777,223	4,535,006	1,474,283	88,928,433	$ 740,848,790	$ 134,129,317	$ 114,671,829	5,469,500	172,238,055	177,707,555	563,141,235	4,381,927	1,383,664
Jun-27	19,310,789	6,155,987	25,466,777	112,442,705	$ 859,024,164	4,695,929	1,525,583	95,149,945	$ 763,874,219	$ 137,909,482	$ 118,664,217	5,409,844	177,707,555	183,117,399	580,756,821	4,518,998	1,383,664
Jul-27	-	-	-	116,122,497	$ 862,703,957	4,695,929	1,525,583	101,371,457	$ 761,332,500	$ 116,122,497	$ 122,344,009	(1,748,867)	183,117,399	181,368,532	579,963,968	4,512,828	-
Aug-27	-	-	-	119,701,917	$ 866,283,376	4,695,929	1,525,583	107,592,969	$ 758,690,407	$ 119,701,917	$ 125,923,429	(1,748,867)	181,368,532	179,619,665	579,070,742	4,505,878	-
Sep-27	-	-	-	123,180,964	$ 869,762,423	4,695,929	1,525,583	113,814,481	$ 755,947,942	$ 123,180,964	$ 129,402,476	(1,748,867)	179,619,665	177,870,797	578,077,144	4,498,146	-
Oct-27	-	-	-	126,559,638	$ 873,141,098	4,695,929	1,525,583	120,035,994	$ 753,105,104	$ 126,559,638	$ 132,781,151	(1,748,867)	177,870,797	176,121,930	576,983,174	4,489,634	-
Nov-27	-	-	-	129,837,940	$ 876,419,400	4,695,929	1,525,583	126,257,506	$ 750,161,894	$ 129,837,940	$ 136,059,452	(1,748,867)	176,121,930	174,373,063	575,788,830	4,480,341	-
Dec-27	-	-	-	133,015,869	$ 879,597,329	4,695,929	1,525,583	132,479,018	$ 747,118,311	$ 133,015,869	$ 139,237,381	(1,748,867)	174,373,063	172,624,196	574,494,114	4,470,266	-
Jan-28	-	-	-	130,071,069	$ 876,652,528	4,695,929	1,525,583	138,700,530	$ 737,951,998	$ 130,071,069	$ 136,292,581	(1,748,867)	172,624,196	170,875,329	567,076,669	4,412,549	-
Feb-28	-	-	-	127,126,269	$ 873,707,728	4,695,929	1,525,583	144,922,042	$ 728,785,686	$ 127,126,269	$ 133,347,781	(1,748,867)	170,875,329	169,126,462	559,659,224	4,354,832	-
Mar-28	-	-	-	124,181,468	$ 870,762,928	4,695,929	1,525,583	151,143,554	$ 719,619,373	$ 124,181,468	$ 130,402,981	(1,748,867)	169,126,462	167,377,595	552,241,778	4,297,116	-
Apr-28	-	-	-	121,236,668	$ 867,818,127	4,695,929	1,525,583	157,365,067	$ 710,453,061	$ 121,236,668	$ 127,458,180	(1,748,867)	167,377,595	165,628,728	544,824,333	4,239,399	-
May-28	-	-	-	118,291,868	$ 864,873,327	4,695,929	1,525,583	163,586,579	$ 701,286,748	$ 118,291,868	$ 124,513,380	(1,748,867)	165,628,728	163,879,861	537,406,887	4,181,682	-
Jun-28	-	-	-	115,347,067	$ 861,928,527	4,695,929	1,525,583	169,808,091	$ 692,120,436	$ 115,347,067	$ 121,568,580	(1,748,867)	163,879,861	162,130,994	529,989,442	4,123,965	-
Jul-28	-	-	-	112,402,267	$ 858,983,726	4,695,929	1,525,583	176,029,603	$ 682,954,123	$ 112,402,267	$ 118,623,779	(1,748,867)	162,130,994	160,382,127	522,571,997	4,066,249	-
Aug-28	-	-	-	109,457,467	$ 856,038,926	4,695,929	1,525,583	182,251,115	$ 673,787,811	$ 109,457,467	$ 115,678,979	(1,748,867)	160,382,127	158,633,260	515,154,551	4,008,532	-
Sep-28	-	-	-	106,512,666	$ 853,094,126	4,695,929	1,525,583	188,472,627	$ 664,621,498	$ 106,512,666	$ 112,734,179	(1,748,867)	158,633,260	156,884,393	507,737,106	3,950,815	-
Oct-28	-	-	-	103,567,866	$ 850,149,326	4,695,929	1,525,583	194,694,140	$ 655,455,186	$ 103,567,866	$ 109,789,378	(1,748,867)	156,884,393	155,135,526	500,319,660	3,893,098	-
Nov-28	-	-	-	100,623,066	$ 847,204,525	4,695,929	1,525,583	200,915,652	$ 646,288,873	$ 100,623,066	$ 106,844,578	(1,748,867)	155,135,526	153,386,659	492,902,215	3,835,381	-
Dec-28	-	-	-	97,678,266	$ 844,259,725	4,695,929	1,525,583	207,137,164	$ 637,122,561	$ 97,678,266	$ 103,899,778	(1,748,867)	153,386,659	151,637,791	485,484,770	3,777,665	-
Jan-29	-	-	-	94,733,465	$ 841,314,925	4,695,929	1,525,583	213,358,676	$ 627,956,249	$ 94,733,465	$ 100,954,977	(1,748,867)	151,637,791	149,888,924	478,067,324	3,719,948	-
Feb-29	-	-	-	91,788,665	$ 838,370,124	4,695,929	1,525,583	219,580,188	$ 618,789,936	$ 91,788,665	$ 98,010,177	(1,748,867)	149,888,924	148,140,057	470,649,879	3,662,231	-
Mar-29	-	-	-	88,843,865	$ 835,425,324	4,695,929	1,525,583	225,801,700	$ 609,623,624	$ 88,843,865	$ 95,065,377	(1,748,867)	148,140,057	146,391,190	463,232,433	3,604,514	-
Apr-29	-	-	-	85,899,064	$ 832,480,524	4,695,929	1,525,583	232,023,213	$ 600,457,311	$ 85,899,064	$ 92,120,576	(1,748,867)	146,391,190	144,642,323	455,814,988	3,546,797	-
May-29	-	-	-	82,954,264	$ 829,535,723	4,695,929	1,525,583	238,244,725	$ 591,290,999	$ 82,954,264	$ 89,175,776	(1,748,867)	144,642,323	142,893,456	448,397,542	3,489,081	-
Jun-29	-	-	-	80,009,464	$ 826,590,923	4,695,929	1,525,583	244,466,237	$ 582,124,686	$ 80,009,464	$ 86,230,976	(1,748,867)	142,893,456	141,144,589	440,980,097	3,431,364	-
Jul-29	-	-	-	77,064,663	$ 823,646,123	4,695,929	1,525,583	250,687,749	$ 572,958,374	$ 77,064,663	$ 83,286,175	(1,748,867)	141,144,589	139,395,722	433,562,652	3,373,647	-
Aug-29	-	-	-	74,119,863	$ 820,701,322	4,695,929	1,525,583	256,909,261	$ 563,792,061	$ 74,119,863	$ 80,341,375	(1,748,867)	139,395,722	137,646,855	426,145,206	3,315,930	-
Sep-29	-	-	-	71,175,063	$ 817,756,522	4,695,929	1,525,583	263,130,773	$ 554,625,749	$ 71,175,063	$ 77,396,575	(1,748,867)	137,646,855	135,897,988	418,727,761	3,258,214	-
Oct-29	-	-	-	68,230,262	$ 814,811,722	4,695,929	1,525,583	269,352,285	$ 545,459,436	$ 68,230,262	$ 74,451,774	(1,748,867)	135,897,988	134,149,121	411,310,315	3,200,497	-
Nov-29	-	-	-	65,285,462	$ 811,866,921	4,695,929	1,525,583	275,573,798	$ 536,293,124	$ 65,285,462	$ 71,506,974	(1,748,867)	134,149,121	132,400,254	403,892,870	3,142,780	-
Dec-29	-	-	-	62,340,662	$ 808,922,121	4,695,929	1,525,583	281,795,310	$ 527,126,811	$ 62,340,662	$ 68,562,174	(1,748,867)	132,400,254	130,651,387	396,475,425	3,085,063	-
Jan-30	-	-	-	59,395,861	$ 805,977,321	4,695,929	1,525,583	288,016,822	$ 517,960,499	$ 59,395,861	$ 65,617,374	(1,748,867)	130,651,387	128,902,520	389,057,979	3,027,346	-
Feb-30	-	-	-	56,496,837	$ 803,078,297	4,695,929	1,525,583	294,238,334	$ 508,839,963	$ 56,496,837	$ 62,718,350	(1,748,867)	128,902,520	127,153,653	381,686,310	2,969,986	-
Mar-30	-	-	-	53,643,590	$ 800,225,049	4,695,929	1,525,583	300,459,846	$ 499,765,203	$ 53,643,590	$ 59,865,102	(1,748,867)	127,153,653	125,404,785	374,360,418	2,912,981	-
Apr-30	-	-	-	50,836,119	$ 797,417,578	4,695,929	1,525,583	306,681,358	$ 490,736,220	$ 50,836,119	$ 57,057,631	(1,748,867)	125,404,785	123,655,918	367,080,301	2,856,333	-
May-30	-	-	-	48,074,424	$ 794,655,883	4,695,929	1,525,583	312,902,871	$ 481,753,013	$ 48,074,424	$ 54,295,936	(1,748,867)	123,655,918	121,907,051	359,845,962	2,800,041	-
Jun-30	-	-	-	45,358,506	$ 791,939,965	4,695,929	1,525,583	319,124,383	$ 472,815,582	$ 45,358,506	$ 51,580,018	(1,748,867)	121,907,051	120,158,184	352,657,398	2,744,105	-
Jul-30	-	-	-	42,688,364	$ 789,269,823	4,695,929	1,525,583	325,345,895	$ 463,923,928	$ 42,688,364	$ 48,909,876	(1,748,867)	120,158,184	118,409,317	345,514,611	2,688,526	-
Aug-30	-	-	-	40,063,998	$ 786,645,458	4,695,929	1,525,583	331,567,407	$ 455,078,050	$ 40,063,998	$ 46,285,510	(1,748,867)	118,409,317	116,660,450	338,417,600	2,633,302	-
Sep-30	-	-	-	37,485,409	$ 784,066,868	4,695,929	1,525,583	337,788,919	$ 446,277,949	$ 37,485,409	$ 43,706,921	(1,748,867)	116,660,450	114,911,583	331,366,366	2,578,435	-
Oct-30	-	-	-	34,952,596	$ 781,534,056	4,695,929	1,525,583	344,010,431	$ 437,523,624	$ 34,952,596	$ 41,174,108	(1,748,867)	114,911,583	113,162,716	324,360,908	2,523,924	-
Nov-30	-	-	-	32,465,560	$ 779,047,019	4,695,929	1,525,583	350,231,944	$ 428,815,076	$ 32,465,560	$ 38,687,072	(1,748,867)	113,162,716	111,413,849	317,401,227	2,469,769	-
Dec-30	-	-	-	30,024,300	$ 776,605,759	4,695,929	1,525,583	356,453,456	$ 420,152,303	$ 30,024,300	$ 36,245,812	(1,748,867)	111,413,849	109,664,982	310,487,322	2,415,971	-
Jan-31	-	-	-	27,628,816	$ 774,210,276	4,695,929	1,525,583	362,674,968	$ 411,535,308	$ 27,628,816	$ 33,850,328	(1,748,867)	109,664,982	107,916,115	303,619,193	2,362,528	-
Feb-31	-	-	-	25,332,584	$ 771,914,043	4,695,929	1,525,583	368,896,480	$ 403,017,563	$ 25,332,584	$ 31,554,096	(1,748,867)	107,916,115	106,167,248	296,850,315	2,309,858	-
Mar-31	-	-	-	23,135,602	$ 769,717,062	4,695,929	1,525,583	375,117,992	$ 394,599,069	$ 23,135,602	$ 29,357,114	(1,748,867)	106,167,248	104,418,381	290,180,689	2,257,960	-
Apr-31	-	-	-	21,037,872	$ 767,619,331	4,695,929	1,525,583	381,339,504	$ 386,279,827	$ 21,037,872	$ 27,259,384	(1,748,867)	104,418,381	102,669,514	283,610,313	2,206,835	-
May-31	-	-	-	19,039,392	$ 765,620,851	4,695,929	1,525,583	387,561,017	$ 378,059,835	$ 19,039,392	$ 25,260,904	(1,748,867)	102,669,514	100,920,646	277,139,188	2,156,481	-
Jun-31	-	-	-	17,140,164	$ 763,721,623	4,695,929	1,525,583	393,782,529	$ 369,939,094	$ 17,140,164	$ 23,361,676	(1,748,867)	100,920,646	99,171,779	270,767,315	2,106,901	-

Jersey Central Power & Light
Clean Energy Energy Efficiency Program
Electric Revenue Requirements Calculation

Program Investment Amortization	Years	10
Monthly WACC Effective 7/1/21		0.77812%
Federal & State Income tax rate		28.11%

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
Investment Month	Customer Incentives FERC (182)	Outside Services FERC (182)	Total Monthly Investments FERC (182)	Financing Balance Investments FERC (182)	Cumulative Investments FERC (182)	Customer Incentives Amortization FERC (407)	Outside Services Amortization FERC (407)	Accumulated Amortization FERC (407)	Net Investments (1) + (2) +(4) - (8)	Tax Amortization (3) + (4)	Book Amortization Tax Basis (4) + (6) +(7)	Deferred Income Tax FERC (283)	Beginning Accumulated Deferred Income Tax (12) + (13)	Ending Accumulated Deferred Income Tax (12) + (14)	Rate Base (9) - (14)	Return Component (15) x WACC	O & M Expenses FERC (923)
Jul-31	-	-	-	15,340,186	$ 761,921,645	4,695,929	1,525,583	400,004,041	$ 361,917,605	$ 15,340,186	$ 21,561,698	(1,748,867)	99,171,779	97,422,912	264,494,692	2,058,092	-
Aug-31	-	-	-	13,639,460	$ 760,220,919	4,695,929	1,525,583	406,225,553	$ 353,995,366	$ 13,639,460	$ 19,860,972	(1,748,867)	97,422,912	95,674,045	258,321,321	2,010,055	-
Sep-31	-	-	-	12,037,984	$ 758,619,444	4,695,929	1,525,583	412,447,065	$ 346,172,378	$ 12,037,984	$ 18,259,496	(1,748,867)	95,674,045	93,925,178	252,247,200	1,962,791	-
Oct-31	-	-	-	10,535,760	$ 757,117,219	4,695,929	1,525,583	418,668,577	$ 338,448,642	$ 10,535,760	$ 16,757,272	(1,748,867)	93,925,178	92,176,311	246,272,331	1,916,300	-
Nov-31	-	-	-	9,132,786	$ 755,714,246	4,695,929	1,525,583	424,890,090	$ 330,824,156	$ 9,132,786	$ 15,354,298	(1,748,867)	92,176,311	90,427,444	240,396,712	1,870,580	-
Dec-31	-	-	-	7,829,064	$ 754,410,523	4,695,929	1,525,583	431,111,602	$ 323,298,922	$ 7,829,064	$ 14,050,576	(1,748,867)	90,427,444	88,678,577	234,620,345	1,825,633	-
Jan-32	-	-	-	6,624,593	$ 753,206,052	4,695,929	1,525,583	437,333,114	$ 315,872,938	$ 6,624,593	$ 12,846,105	(1,748,867)	88,678,577	86,929,710	228,943,228	1,781,458	-
Feb-32	-	-	-	5,520,494	$ 752,101,953	4,695,929	1,525,583	443,554,626	$ 308,547,327	$ 5,520,494	$ 11,742,006	(1,748,867)	86,929,710	85,180,843	223,366,484	1,738,064	-
Mar-32	-	-	-	4,516,768	$ 751,098,227	4,695,929	1,525,583	449,776,138	$ 301,322,089	$ 4,516,768	$ 10,738,280	(1,748,867)	85,180,843	83,431,976	217,890,113	1,695,451	-
Apr-32	-	-	-	3,613,414	$ 750,194,873	4,695,929	1,525,583	455,997,650	$ 294,197,223	$ 3,613,414	$ 9,834,926	(1,748,867)	83,431,976	81,683,109	212,514,114	1,653,619	-
May-32	-	-	-	2,810,433	$ 749,391,893	4,695,929	1,525,583	462,219,162	$ 287,172,730	$ 2,810,433	$ 9,031,945	(1,748,867)	81,683,109	79,934,242	207,238,488	1,612,569	-
Jun-32	-	-	-	2,107,825	$ 748,689,284	4,695,929	1,525,583	468,440,675	$ 280,248,610	$ 2,107,825	$ 8,329,337	(1,748,867)	79,934,242	78,185,375	202,063,235	1,572,299	-
Jul-32	-	-	-	1,505,589	$ 748,087,049	4,695,929	1,525,583	474,662,187	$ 273,424,862	$ 1,505,589	$ 7,727,101	(1,748,867)	78,185,375	76,436,508	196,988,354	1,532,810	-
Aug-32	-	-	-	1,003,726	$ 747,585,186	4,695,929	1,525,583	480,883,699	$ 266,701,487	$ 1,003,726	$ 7,225,238	(1,748,867)	76,436,508	74,687,640	192,013,846	1,494,102	-
Sep-32	-	-	-	602,236	$ 747,183,695	4,695,929	1,525,583	487,105,211	$ 260,078,484	$ 602,236	$ 6,823,748	(1,748,867)	74,687,640	72,938,773	187,139,711	1,456,176	-
Oct-32	-	-	-	301,118	$ 746,882,577	4,695,929	1,525,583	493,326,723	$ 253,555,854	$ 301,118	$ 6,522,630	(1,748,867)	72,938,773	71,189,906	182,365,948	1,419,030	-
Nov-32	-	-	-	100,373	$ 746,681,832	4,695,929	1,525,583	499,548,235	$ 247,133,597	$ 100,373	$ 6,321,885	(1,748,867)	71,189,906	69,441,039	177,692,557	1,382,665	-
Dec-32	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	505,769,748	$ 240,811,712	$ -	$ 6,221,512	(1,748,867)	69,441,039	67,692,172	173,119,540	1,347,082	-
Jan-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	511,991,260	$ 234,590,200	$ -	$ 6,221,512	(1,748,867)	67,692,172	65,943,305	168,646,894	1,312,279	-
Feb-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	518,212,772	$ 228,368,687	$ -	$ 6,221,512	(1,748,867)	65,943,305	64,194,438	164,174,249	1,277,476	-
Mar-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	524,434,284	$ 222,147,175	$ -	$ 6,221,512	(1,748,867)	64,194,438	62,445,571	159,701,604	1,242,674	-
Apr-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	530,655,796	$ 215,925,663	$ -	$ 6,221,512	(1,748,867)	62,445,571	60,696,704	155,228,959	1,207,871	-
May-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	536,877,308	$ 209,704,151	$ -	$ 6,221,512	(1,748,867)	60,696,704	58,947,837	150,756,314	1,173,068	-
Jun-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	543,098,821	$ 203,482,639	$ -	$ 6,221,512	(1,748,867)	58,947,837	57,198,970	146,283,669	1,138,266	-
Jul-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	549,320,333	$ 197,261,127	$ -	$ 6,221,512	(1,748,867)	57,198,970	55,450,103	141,811,024	1,103,463	-
Aug-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	555,541,845	$ 191,039,614	$ -	$ 6,221,512	(1,748,867)	55,450,103	53,701,236	137,338,379	1,068,660	-
Sep-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	561,763,357	$ 184,818,102	$ -	$ 6,221,512	(1,748,867)	53,701,236	51,952,369	132,865,734	1,033,858	-
Oct-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	567,984,869	$ 178,596,590	$ -	$ 6,221,512	(1,748,867)	51,952,369	50,203,501	128,393,089	999,055	-
Nov-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	574,206,381	$ 172,375,078	$ -	$ 6,221,512	(1,748,867)	50,203,501	48,454,634	123,920,444	964,252	-
Dec-33	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	580,427,894	$ 166,153,566	$ -	$ 6,221,512	(1,748,867)	48,454,634	46,705,767	119,447,798	929,450	-
Jan-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	586,649,406	$ 159,932,054	$ -	$ 6,221,512	(1,748,867)	46,705,767	44,956,900	114,975,153	894,647	-
Feb-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	592,870,918	$ 153,710,541	$ -	$ 6,221,512	(1,748,867)	44,956,900	43,208,033	110,502,508	859,845	-
Mar-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	599,092,430	$ 147,489,029	$ -	$ 6,221,512	(1,748,867)	43,208,033	41,459,166	106,029,863	825,042	-
Apr-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	605,313,942	$ 141,267,517	$ -	$ 6,221,512	(1,748,867)	41,459,166	39,710,299	101,557,218	790,239	-
May-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	611,535,454	$ 135,046,005	$ -	$ 6,221,512	(1,748,867)	39,710,299	37,961,432	97,084,573	755,437	-
Jun-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	617,756,967	$ 128,824,493	$ -	$ 6,221,512	(1,748,867)	37,961,432	36,212,565	92,611,928	720,634	-
Jul-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	623,978,479	$ 122,602,981	$ -	$ 6,221,512	(1,748,867)	36,212,565	34,463,698	88,139,283	685,831	-
Aug-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	630,199,991	$ 116,381,469	$ -	$ 6,221,512	(1,748,867)	34,463,698	32,714,831	83,666,638	651,029	-
Sep-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	636,421,503	$ 110,159,956	$ -	$ 6,221,512	(1,748,867)	32,714,831	30,965,964	79,193,993	616,226	-
Oct-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	642,643,015	$ 103,938,444	$ -	$ 6,221,512	(1,748,867)	30,965,964	29,217,097	74,721,348	581,423	-
Nov-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	648,864,527	$ 97,716,932	$ -	$ 6,221,512	(1,748,867)	29,217,097	27,468,230	70,248,702	546,621	-
Dec-34	-	-	-	-	$ 746,581,459	4,695,929	1,525,583	655,086,040	$ 91,495,420	$ -	$ 6,221,512	(1,748,867)	27,468,230	25,719,363	65,776,057	511,818	-
Jan-35	-	-	-	-	$ 746,581,459	4,551,178	1,473,814	661,111,031	$ 85,470,428	$ -	$ 6,024,992	(1,693,625)	25,719,363	24,025,737	61,444,691	478,115	-
Feb-35	-	-	-	-	$ 746,581,459	4,406,426	1,422,045	666,939,503	$ 79,641,957	$ -	$ 5,828,471	(1,638,383)	24,025,737	22,387,354	57,254,603	445,511	-
Mar-35	-	-	-	-	$ 746,581,459	4,261,675	1,370,276	672,571,454	$ 74,010,006	$ -	$ 5,631,951	(1,583,141)	22,387,354	20,804,213	53,205,793	414,006	-
Apr-35	-	-	-	-	$ 746,581,459	4,116,923	1,318,507	678,006,884	$ 68,574,575	$ -	$ 5,435,431	(1,527,900)	20,804,213	19,276,313	49,298,262	383,601	-
May-35	-	-	-	-	$ 746,581,459	3,972,172	1,266,738	683,245,794	$ 63,335,665	$ -	$ 5,238,910	(1,472,658)	19,276,313	17,803,655	45,532,010	354,295	-
Jun-35	-	-	-	-	$ 746,581,459	3,827,420	1,214,969	688,288,184	$ 58,293,276	$ -	$ 5,042,390	(1,417,416)	17,803,655	16,386,240	41,907,036	326,088	-
Jul-35	-				$ 746,581,459	3,669,392	1,165,022	693,122,598	$ 53,458,862	$ -	$ 4,834,414	(1,358,954)	16,386,240	15,027,286	38,431,576	299,045	-
Aug-35	-				$ 746,581,459	3,511,364	1,115,074	697,749,035	$ 48,832,424	$ -	$ 4,626,438	(1,300,492)	15,027,286	13,726,794	35,105,630	273,165	-
Sep-35	-				$ 746,581,459	3,353,335	1,065,127	702,167,497	$ 44,413,962	$ -	$ 4,418,462	(1,242,030)	13,726,794	12,484,765	31,929,198	248,448	-
Oct-35	-				$ 746,581,459	3,195,307	1,015,179	706,377,983	$ 40,203,477	$ -	$ 4,210,486	(1,183,568)	12,484,765	11,301,197	28,902,279	224,895	-
Nov-35	-				$ 746,581,459	3,037,278	965,232	710,380,492	$ 36,200,967	$ -	$ 4,002,510	(1,125,105)	11,301,197	10,176,092	26,024,875	202,505	-
Dec-35	-				$ 746,581,459	2,879,250	915,284	714,175,026	$ 32,406,433	$ -	$ 3,794,534	(1,066,643)	10,176,092	9,109,448	23,296,985	181,279	-
Jan-36					$ 746,581,459	2,721,221	865,336	717,761,584	$ 28,819,876	$ -	$ 3,586,558	(1,008,181)	9,109,448	8,101,267	20,718,609	161,216	-
Feb-36					$ 746,581,459	2,563,193	815,389	721,140,165	$ 25,441,294	$ -	$ 3,378,582	(949,719)	8,101,267	7,151,548	18,289,746	142,317	-
Mar-36					$ 746,581,459	2,405,164	765,441	724,310,771	$ 22,270,688	$ -	$ 3,170,606	(891,257)	7,151,548	6,260,290	16,010,398	124,580	-
Apr-36					$ 746,581,459	2,247,136	715,494	727,273,401	$ 19,308,059	$ -	$ 2,962,630	(832,795)	6,260,290	5,427,495	13,880,563	108,008	-
May-36					$ 746,581,459	2,089,107	665,546	730,028,054	$ 16,553,405	$ -	$ 2,754,654	(774,333)	5,427,495	4,653,162	11,900,243	92,598	-
Jun-36					$ 746,581,459	1,931,079	615,599	732,574,732	$ 14,006,727	$ -	$ 2,546,678	(715,871)	4,653,162	3,937,291	10,069,436	78,353	-
Jul-36					$ 746,581,459	1,770,156	564,299	734,909,187	$ 11,672,273	$ -	$ 2,334,455	(656,215)	3,937,291	3,281,076	8,391,197	65,294	-
Aug-36					$ 746,581,459	1,609,232	512,999	737,031,418	$ 9,550,041	$ -	$ 2,122,231	(596,559)	3,281,076	2,684,517	6,865,525	53,422	-
Sep-36					$ 746,581,459	1,448,309	461,699	738,941,426	$ 7,640,033	$ -	$ 1,910,008	(536,903)	2,684,517	2,147,613	5,492,420	42,738	-
Oct-36					$ 746,581,459	1,287,386	410,399	740,639,211	$ 5,942,248	$ -	$ 1,697,785	(477,247)	2,147,613	1,670,366	4,271,882	33,240	-
Nov-36					$ 746,581,459	1,126,463	359,099	742,124,773	$ 4,456,686	$ -	$ 1,485,562	(417,591)	1,670,366	1,252,774	3,203,912	24,930	-
Dec-36					$ 746,581,459	965,539	307,799	743,398,112	$ 3,183,347	$ -	$ 1,273,339	(357,936)	1,252,774	894,839	2,288,508	17,807	-
Jan-37					$ 746,581,459	804,616	256,499	744,459,228	$ 2,122,231	$ -	$ 1,061,116	(298,280)	894,839	596,559	1,525,672	11,872	-
Feb-37					$ 746,581,459	643,693	205,200	745,308,121	$ 1,273,339	$ -	$ 848,893	(238,624)	596,559	357,936	915,403	7,123	-
Mar-37					$ 746,581,459	482,770	153,900	745,944,790	$ 636,669	$ -	$ 636,669	(178,968)	357,936	178,968	457,702	3,561	-
Apr-37					$ 746,581,459	321,846	102,600	746,369,236	$ 212,223	$ -	$ 424,446	(119,312)	178,968	59,656	152,567	1,187	-
May-37					$ 746,581,459	160,923	51,300	746,581,459	$ 0	$ -	$ 212,223	(59,656)	59,656	(0)	0	0	-
Total	$ 563,511,499	$ 183,069,960	$ 746,581,459	$ 5,388,984,579		$ 563,511,499	$ 183,069,960			$ 6,135,566,039	$ 6,135,566,039	$ (0)				$ 290,423,754	$ 40,884,283

Jersey Central Power & Light **Schedule CAP-4**

Clean Energy Energy Efficiency Program

Proposed Rate Calculation

(In $ per kWh)

Line #		1/1/2025 to 6/30/2025	7/1/2025 to 6/30/2026	7/1/2026 to 6/30/2027	Comments
	EE&C				
1	Amortization Expense	$ 4,126,929	$ 30,371,598	$ 60,651,419	Schedule CAP-3, Col. 6 + Col. 7
2	Rate of Return	3,145,064	22,555,366	44,756,460	Schedule CAP-3, Col. 16
3	O & M Expenses	7,915,048	16,365,262	16,603,973	Schedule CAP-3, Col. 17
4	less Revenue offsets	-	-	-	
5	Revenue Requirements	$ 15,187,040	$ 69,292,226	$ 122,011,852	Schedule CAP-3, Col 18
6	Forecasted kWh	9,376,043,343	19,789,460,383	19,427,505,428	
7	Proposed rate w/o SUT ($/kWh)	$ 0.001620	$ 0.003501	$ 0.006280	Line 5 / Line 6 (rounded 6 dec. pts.)
8	**Proposed rate w SUT ($/kWh)**	**$ 0.001727**	**$ 0.003733**	**$ 0.006696**	Line 7 x (1 + 6.625%)
9	Revenues received	$ 16,192,427	$ 73,874,056	$ 130,086,576	Line 8 x Line 6

Clean Energy Energy Efficiency Program
Electric Revenue Requirements Calculation
Customer Impacts

Class Average Per Customer/Fixture

Rate Class	Current Monthly Bill (1)	Effective January 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2026 Proposed Monthly Bill (2)
Residential (RS)	$119.02	$120.00	$121.57	$123.89
Residential Time of Day (RT/RGT)	$164.20	$165.58	$167.83	$171.15
General Service – Secondary (GS)	$612.43	$617.80	$626.48	$639.30
General Service - Secondary Time of Day (GST)	$34,850.66	$35,113.83	$35,539.23	$36,167.56
General Service – Primary (GP)	$48,532.18	$48,942.58	$49,605.97	$50,585.85
General Service – Transmission (GT)	$124,314.63	$125,491.91	$127,394.90	$130,205.76
Lighting (Average Per Fixture)	$11.70	$11.76	$11.85	$11.98

Class Average Per Customer /Fixture Incremental Increase ($)

Rate Class	Current Monthly Bill (1)	Effective January 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2026 Proposed Monthly Bill (2)
Residential (RS)	$119.02	$0.98	$1.57	$2.32
Residential Time of Day (RT/RGT)	$164.20	$1.38	$2.25	$3.32
General Service – Secondary (GS)	$612.43	$5.37	$8.68	$12.82
General Service - Secondary Time of Day (GST)	$34,850.66	$263.17	$425.40	$628.33
General Service – Primary (GP)	$48,532.18	$410.40	$663.39	$979.88
General Service – Transmission (GT)	$124,314.63	$1,177.28	$1,902.99	$2,810.86
Lighting (Average Per Fixture)	$11.70	$0.06	$0.09	$0.13

Class Average Per Customer /Fixture Incremental Increase %

Rate Class	Current Monthly Bill (1)	Effective January 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2026 Proposed Monthly Bill (2)
Residential (RS)	$119.02	0.8%	1.3%	1.9%
Residential Time of Day (RT/RGT)	$164.20	0.8%	1.4%	2.0%
General Service – Secondary (GS)	$612.43	0.9%	1.4%	2.0%
General Service - Secondary Time of Day (GST)	$34,850.66	0.8%	1.2%	1.8%
General Service – Primary (GP)	$48,532.18	0.8%	1.4%	2.0%
General Service – Transmission (GT)	$124,314.63	0.9%	1.5%	2.2%
Lighting (Average Per Fixture)	$11.70	0.5%	0.8%	1.1%

Typical Residential Customer on RS Rate

	Current Monthly Bill (1)	Effective January 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2025 Proposed Monthly Bill (2)	Effective July 1, 2026 Proposed Monthly Bill (2)
Residential (RS) using 783 kW per Month	$116.88	$117.85	$119.42	$121.74
Incremental Increase ($)		$0.97	$1.57	$2.32
% of Incremental Increase		0.8%	1.3%	1.9%
Cumulative Increase from Current ($)		$0.97	$2.54	$4.86
Cumulative Increase from Current (%)		0.8%	2.2%	4.2%

{1} Rates effective 10/1/2023

{2} Proposed EE rates at respective dates, all other rates remain the same, includes NJ SUT

Jersey Central Power & Light **Schedule CAP-6**

Clean Energy Energy Efficiency Program

Proposed Lost Revenue Rate Calculation

	1/1/2025 to 6/30/2025		7/1/2025 to 6/30/2026		7/1/2026 to 6/30/2027	
Target Gross Savings (kWh)						
	Summer	**Winter**	**Summer**	**Winter**	**Summer**	**Winter**
RS	3,840,855	18,072,622	31,259,863	65,700,900	71,449,131	117,530,625
RT	59,048	406,558	444,711	1,428,113	1,003,541	2,512,620
RGT	4,820	35,985	34,666	126,239	77,411	221,696
GS	7,781,192	38,780,418	51,032,516	139,228,957	122,391,397	263,304,495
GST	520,912	2,562,199	3,416,424	9,340,928	8,234,062	17,847,323
GP	1,906,075	8,969,918	12,725,590	33,193,434	30,741,970	64,004,589
GT	2,157,265	10,826,956	14,093,852	39,928,430	33,848,722	76,707,203
OL	-	-	-	-	-	-
PHSL	-	-	-	-	-	-
	16,270,166	79,654,655	113,007,622	288,947,000	267,746,235	542,128,550
Revenue Factor ($ per kWh)						
RS	$0.066487	$0.027542	$0.066487	$0.027542	$0.066487	$0.027542
RT	$0.033661	$0.027608	$0.033661	$0.027608	$0.033661	$0.027608
RGT	$0.033661	$0.027542	$0.033661	$0.027542	$0.033661	$0.027542
GS	$0.031422	$0.028526	$0.031422	$0.028526	$0.031422	$0.028526
GST	$0.025540	$0.023738	$0.025540	$0.023738	$0.025540	$0.023738
GP	$0.016987	$0.016626	$0.016987	$0.016626	$0.016987	$0.016626
GT	$0.010826	$0.010826	$0.010826	$0.010826	$0.010826	$0.010826
OL	$0.046926	$0.046926	$0.046926	$0.046926	$0.046926	$0.046926
PHSL	$0.046926	$0.046926	$0.046926	$0.046926	$0.046926	$0.046926
Lost Revenue						
RS	$255,367	$497,756	$2,078,375	$1,809,534	$4,750,438	$3,237,028
RT	$1,988	$11,224	$14,969	$39,427	$33,780	$69,367
RGT	$162	$991	$1,167	$3,477	$2,606	$6,106
GS	$244,502	$1,106,267	$1,603,551	$3,971,705	$3,845,799	$7,511,138
GST	$13,304	$60,821	$87,255	$221,732	$210,297	$423,654
GP	$32,379	$149,136	$216,172	$551,881	$522,218	$1,064,153
GT	$23,354	$117,210	$152,577	$432,256	$366,439	$830,416
OL	$0	$0	$0	$0	$0	$0
PHSL	$0	$0	$0	$0	$0	$0
	$571,055	$1,943,405	$4,154,065	$7,030,013	$9,731,578	$13,141,863

	Allocated 6 month	**Allocated Annual**	**Allocated Annual**
RS	$1,358,627	$6,043,040	$12,359,099
RT/RGT	$28,089	$124,935	$255,515
GS	$807,478	$3,591,585	$7,345,435
GST	$48,338	$215,004	$439,722
GP	$110,915	$493,340	$1,008,968
GT	$83,792	$372,701	$762,240
Lighting (OL, SVL, MVL, ISL, LED)	$77,221	$343,472	$702,462
	$2,514,460	$11,184,078	$22,873,441

Forecast Sales			
RS	4,331,783,956 *kWH*	9,596,762,766 *kWH*	9,569,926,890 *kWH*
RT/RGT	100,105,480 *kWH*	186,901,480 *kWH*	186,925,613 *kWH*
GS	3,088,761,907 *kWH*	6,147,567,795 *kWH*	5,925,203,260 *kWH*
GST	482,080 *kW*	1,018,983 *kW*	991,636 *kW*
GP	1,571,600 *kW*	3,396,953 *kW*	3,301,682 *kW*
GT	2,096,892 *kW*	4,376,048 *kW*	4,241,737 *kW*
Lighting (OL, SVL, MVL, ISL, LED)	68,050,111 *kWH*	136,205,405 *kWH*	136,347,561 *kWH*

Lost Revenue Rate			
RS	$0.000314 *$/kWH*	$0.000630 *$/kWH*	$0.001291 *$/kWH*
RT/RGT	$0.000281 *$/kWH*	$0.000668 *$/kWH*	$0.001367 *$/kWH*
GS	$0.000261 *$/kWH*	$0.000584 *$/kWH*	$0.001240 *$/kWH*
GST	$0.10 *$/kW*	$0.21 *$/kW*	$0.44 *$/kW*
GP	$0.07 *$/kW*	$0.15 *$/kW*	$0.31 *$/kW*
GT	$0.04 *$/kW*	$0.09 *$/kW*	$0.18 *$/kW*
Lighting (OL, SVL, MVL, ISL, LED)	$0.001135 *$/kWH*	$0.002522 *$/kWH*	$0.005152 *$/kWH*

Lost Revenue Rate with SUT			
RS	$0.000335 *$/kWH*	$0.000672 *$/kWH*	$0.001377 *$/kWH*
RT/RGT	$0.000300 *$/kWH*	$0.000712 *$/kWH*	$0.001458 *$/kWH*
GS	$0.000278 *$/kWH*	$0.000623 *$/kWH*	$0.001322 *$/kWH*
GST	$0.11 *$/kW*	$0.22 *$/kW*	$0.47 *$/kW*
GP	$0.07 *$/kW*	$0.16 *$/kW*	$0.33 *$/kW*
GT	$0.04 *$/kW*	$0.10 *$/kW*	$0.19 *$/kW*
Lighting (OL, SVL, MVL, ISL, LED)	$0.001210 *$/kWH*	$0.002689 *$/kWH*	$0.005493 *$/kWH*

JERSEY CENTRAL POWER & LIGHT COMPANY

XX Rev. Sheet No. 64

BPU No. 13 ELECTRIC - PART III

Superseding XX Rev. Sheet No. 64

Rider RRC
RGGI Recovery Charge

APPLICABILITY: Rider RRC provides a charge for the costs associated with demand response/energy efficiency/renewable energy programs directed by the BPU as detailed below. The RGGI Recovery Charge (RRC) is applicable to all KWH usage of any Full Service Customer or Delivery Service Customer, as follows

For service rendered effective January 1, 2025:

RRC = $0.003071 per KWH ($0.003274 per KWH including SUT)

The above RRC provides recovery for the followings:

Solar Renewable Energy Certificates Financing Program (SREC I & II)

Pursuant to BPU Orders dated March 27, 2009 and September 16, 2009 (Docket No. EO08090840) approving an SREC-based financing program (SREC I), pursuant to BPU Order dated December 18, 2013 (Docket No. EO12080750) approving the SREC II, and pursuant to BPU Order dated December 20, 2019 (Docket No. ER19070806) approving the Stipulation of Settlement, the Company shall include an SREC I & II Rate of **$(0.000152)** per kWh (**$(0.000162)** per kWh including SUT) in RRC effective January 1, 2023.

Transition Renewable Energy Certificate Incentive Program (TREC Program)

On December 6, 2019, the Board issued an Order in Docket No. QO19010068 ("December 6, 2019 Order"), establishing a transition renewable energy certificate ("TREC") program to be implemented upon the attainment of 5.1% of the retail electric sales in the State being from solar. Solar projects that become operational after the State's attainment of the 5.1% milestone but prior to the implementation of a successor solar program will be eligible to participate in the TREC Program, as determined by the Board. The December 6, 2019 Order required the New Jersey Electric Distribution Companies ("EDCs") to purchase all TRECs generated and authorized the EDCs to recover their reasonable and prudent costs incurred for the purchase of TRECs and the fees charged by a TREC Administrator (generally, "TREC Program Costs"). The December 6, 2019 Order further provided that "[r]ecovery shall be based on each EDC's proportionate share of retail electric sales."

The TREC Rate recovers JCP&L's proportional share of TREC Program Costs, including, but not limited to, those costs associated with the purchase of TRECs, fees charged by the TREC Administrator, and any additional costs or expenses incurred by JCP&L as a result of the Company's participation in or implementation of the TREC program.

The TREC Rate for all customer classes is **$0.001068** per kWh (**$0.001139** per kWh including SUT), effective January 1, 2023.

Solar Successor Incentive Program (SuSI Program)

On July 28, 2021, the Board issued an order establishing the Solar Successor Incentive ("SuSI") program ("SuSI Order") pursuant to the New Jersey Clean Energy Act and the Solar Act of 2021. The SuSI Order established a new renewable energy certificate, SREC-IIs, and required that the New Jersey Electric Distribution Companies ("EDCs") purchase all SREC-IIs generated and authorized the EDCs to recover their reasonable and prudent costs for SREC-II procurement and SREC-II Administrator fees (generally, "SuSI Program Costs"). The SuSI Order further provided that "[r]ecovery shall be based on each EDC's proportionate share of retail electric sales."

The SuSI Rate recovers JCP&L's proportional share of SuSI Program Costs, including, but not limited to, those costs associated with the purchase of SREC-IIs, fees charged by the SREC-II Administrator, and any additional costs or expenses incurred by JCP&L as a result of the Company's participation in or implementation of the SuSI program.

The SuSI Rate for all customer classes is **$0.000079**/kWh (**$0.000084**/kWh including SUT), effective January 1, 2023.

Rider RRC
RGGI Recovery Charge

Community Solar Pilot Program (CSP)

Pursuant to N.J.S.A. 48:3-87.11, the Board established a Community Solar Pilot Program. The CSP Rate recovers JCP&L's costs and expenses associated with its implementation of and compliance with the Community Solar Pilot Program, including, but not limited to, recovery of the full value of the cost of community solar credits issued to participating customers, the cost of modifying the Company's systems to implement billing changes for community solar, and incremental administrative costs associated with JCP&L's implementation of and compliance with the Community Solar Pilot Program, to the extent not otherwise recovered in rates. The CSP Rate for all customers classes **$0.000000**/kWh **($0.000000**/kWH including SUT), effective August 1, 2023.

Energy Efficiency and Conservation Program (EE&C)

Pursuant to the BPU Order dated June 10, 2020 directing New Jersey's electric and natural gas companies to establish programs that reduce the use of electricity and natural gas within their territories and the BPU Order dated April 27, 2021 approving the Stipulation of Settlement, the Company shall include a EE&C Charge in RRC effective July 1, 2021. The EE&C Charge provides for recovery of revenue requirements associated with Energy Efficiency and Peak Demand Reduction Programs as approved by the BPU.

Effective January 1, 2023, EE&C rate for service classification is as follows:

EE&C = $0.000456 per KWH ($0.000486 per KWH including SUT)

Energy Efficiency and Conservation Program (EE&C2) – Second Triennium

Pursuant to the BPU Order dated July 26, 2023 directing New Jersey's electric and natural gas companies to propose second triennium programs that reduce the use of electricity and natural gas within their territories and the BPU Order dated xxxxxx, xxxx approving the Stipulation of Settlement, the Company shall include an EE&C2 Charge in RRC effective xxxxxx, xxxx. The EE&C2 Charge provides for recovery of revenue requirements associated with Energy Efficiency, Peak Demand Reduction, and Building Decarbonization Programs as approved by the BPU.

Effective January 1, 2025, the EE&C2 rate for service classification is as follows:

EE&C2 = $0.001620 per KWH ($0.001727 per KWH including SUT)

The Company will submit to the BPU annually an application to recover the revenue requirements for the forthcoming Program Year starting July 1st of each year and ending June 30th of the following year, except for Program Year 4, which runs from January 1, 2025 through June 30, 2025, pursuant to the BPU Order dated October 25, 2023. Pursuant to the BPU Order dated xxxxxx, xxxx ~~at Docket Nos. QO1901040, QO19060748 & QO17091004~~, the revenue requirements will include a return of and on EE&C program investments and a reconciliation of actual revenues with actual costs ~~on an annual basis~~.

The RRC costs shall accrue interest on any over or under recovered balances of such costs at the interest rate based on a two-year constant maturity Treasuries as published in the Federal Reserve Statistical Release on the first day of each month (or the closest day thereafter on which rates are published), plus sixty basis points, but shall not exceed the Company's overall rate of return as approved by the BPU. Such interest rate shall be reset each month. The interest calculation shall be based on the net of tax beginning and end average monthly balance, consistent with the methodology in the Board's Final Order dated May 17, 2004 (Docket No. ER02080506 et al.), compounded annually (added to the balance on which interest is accrued annually) on January 1 of each year.

The Company will make annual filings to true-up the RRC on or before February 1 of each calendar year and will request rate changes, if any, to be implemented on July 1 of the filing year.

JERSEY CENTRAL POWER & LIGHT COMPANY

BPU No. 13 ELECTRIC - PART III

XX Rev. Sheet No. 68
Superseding XX Rev. Sheet No. 68

Rider LRAM
JCP&L Lost Revenue Adjustment Mechanism Charge

APPLICABILITY: The Lost Revenue Adjustment Mechanism Charge ("Rider LRAM" or "LRAM Charge") provides for recovery of the revenue impact of sales losses demonstrated to have resulted from the Company's Energy Efficiency and Peak Demand Reduction Programs, subject to regulations pursuant to N.J.S.A. 48:3-98. 1(a)(1) and as approved by the BPU Order.

The JCP&L LRAM Charge is applicable to Service Classifications RS (Residential Service), RT (Residential Time-of-Day), RGT (Residential Geothermal & Heat Pump), GS (General Service Secondary), GST (General Service Secondary Time-of-Day), GP (General Service Primary), GT (General Service Transmission), OL (Outdoor Lighting), SVL (Sodium Vapor Street Lighting), MVL (Mercury Vapor Street Lighting), ISL (Incandescent Street Lighting) and LED (LED Street Lighting) and for all usage (KWH and KW) of any Full Service Customer or Delivery Service Customer, as follows:

LRAM Charge effective ~~July 1, 2021~~ xxxxxx, xxxx

Service Classification	LRAM Charge (Including SUT)	
RS	$0.000000xxxxxx	per KWH
RT/RGT	$0.000000xxxxxx	per KWH
GS	$0.000000xxxxxx	per KWH
GST	$0.00xx	per KW
GP	$0.00xx	per KW
GT	$0.00xx	per KW
Lighting (OL, SVL, MVL, SVL and LED)	$0.000000xxxxxx	per KWH

The Company will submit to the BPU ~~by August 31st of each year, starting August 31, 2022,~~ as soon as practicable after the data becomes available for each Program Year to recover the lost distribution revenue from the Company's Energy Efficiency and Peak Demand Reduction Programs for the preceding year ended June 30th or the date determined by the Board. The lost distribution revenue in each filing will be considered verified once the underlying energy savings have been verified through the Evaluation Measurement & Verification process undertaken by the Company's independent evaluator, subject to BPU review. ~~Within each rate filing, there will be a reconciliation of actual revenues received with projected revenues, including carrying costs, through the end of February of each year.~~ Any adjustment of the amount of savings used to determine lost revenue recovery resulting from the verification process, but not completed by the time of filing, will be included in the following year's reconciliation. The applicable carrying cost is calculated on a monthly basis at an interest rate equal to the rate on two-year constant maturity Treasuries, as show in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty basis points, compounded annually as of January 1 of each year. All subsequent filings will adhere to the Company's recovery periods as approved in the above referenced BPU Order.

Issued: **Effective:**

Filed pursuant to Order of Board of Public Utilities
Docket No. dated

Issued by James V. Fakult, President
300 Madison Avenue, Morristown, NJ 07962-1911

Jersey Central Power & Light **Schedule CAP-9**
Clean Energy Energy Efficiency Program
Proforma Income Statement & Balance Sheet
For Program Year Ending June 30th of Each Year

INCOME STATEMENT

	Program Year Ending		
	30-Jun-25	30-Jun-26	30-Jun-27
Operating Revenues w/ SUT	$ 16,192,427	$ 73,874,056	$ 130,086,576
less SUT	(1,003,237)	(4,591,155)	(8,081,842)
Net Operating Revenues	**$ 15,189,190**	**$ 69,282,901**	**$ 122,004,734**
Operating Expenses			
Operating & Maintenance Expense	$ 7,915,048	$ 16,365,262	$ 16,603,973
Amortization Expense	4,126,929	30,371,598	60,651,419
Total Operating Expense	**12,041,976**	**46,736,860**	**77,255,392**
Operating Income	**3,147,214**	**22,546,041**	**44,749,342**
Interest Expense	831,379	5,962,380	11,831,110
Income before Income Taxes	**2,315,835**	**16,583,661**	**32,918,233**
Income Tax Expense	(650,981)	(4,661,667)	(9,253,315)
Net Income	**1,664,854**	**11,921,994**	**23,664,917**

BALANCE SHEET

	Program Year Ending		
Assets	30-Jun-25	30-Jun-26	30-Jun-27
Regulatory Asset - Capitalized Program Expenditures	$ 157,287,551	$ 501,863,600	$ 859,024,164
less Accumulated Amortization	4,126,929	34,498,526	95,149,945
Net Regulatory Assets	**$ 153,160,623**	**$ 467,365,074**	**$ 763,874,219**
Total Assets	**$ 153,160,623**	**$ 467,365,074**	**$ 763,874,219**
Liabilities & Capitalization			
Liabilities			
Deferred Income Taxes	$ 38,614,079	$ 114,261,981	$ 183,117,399
Capitalization			
Debt	55,623,801	171,466,862	282,015,512
Common Equity	58,922,742	181,636,231	298,741,309
Total Capitalization	**$ 114,546,543**	**$ 353,103,093**	**$ 580,756,821**
Total Liabilities & Capitalization	**$ 153,160,623**	**$ 467,365,074**	**$ 763,874,219**

EXHIBIT JC-4

BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of JCP&L's Second Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs ("JCP&L EE&C Plan II Filing")

Direct Testimony

of

Brendon J. Baatz

Gabel Associates, Inc.

On Behalf of
Jersey Central Power & Light Company

TABLE OF CONTENTS

I. INTRODUCTION

Q. Please state your name, business address, and position.

A. My name is Brendon J. Baatz and my business address is 417 Denison Street, Highland Park, New Jersey, 08904. I am presently employed as a Vice President at Gabel Associates, Inc., an energy, environmental, and public utility consulting firm. My resume, which sets forth my qualifications, is included as Attachment A to this testimony.

Q. Have you previously testified before the New Jersey Board of Public Utilities ("BPU or "Board")?

A. Yes. I previously testified in BPU Docket Nos. QO19010040, GO20090622, EO20090620, GR18080860, and GR20070503.

Q. What is the purpose of your direct testimony in this case?

A. The purpose of my testimony is to support the Petition filed by Jersey Central Power and Light Company ("JCP&L" or the "Company") requesting the Board's approval of the Company's Second Triennium of Energy Efficiency and Peak Demand Reduction Programs ("EE&C Plan II" or the "Plan), which consist of a portfolio of proposed Energy Efficiency ("EE"), Peak Demand Reduction ("PDR"), and Building Decarbonization ("BD") programs (the "Programs"). I am sponsoring the cost effectiveness analysis for the Programs.

Q. Are you sponsoring any schedules in connection with your direct testimony?

A. Yes. I am presenting the following schedules, which have been prepared under my direction and supervision and are accurate and complete to the best of my knowledge and belief. These schedules contain information responsive to the Minimum Filing Requirements ("MFRs") approved by the Board in its May 24, 2023 Order ("May Order")

and July 26, 2023 Order ("July Order") in BPU Docket Nos. QO19010040, QO23030150, and QO10791004 (the "Orders"), which are referenced in the MFR Index attached as Appendix A to the Verified Petition. The schedules attached include:

Schedule BJB-1 – Cost-Benefit Analysis Workpapers (CONFIDENTIAL)

Schedule BJB-2 – Summary of Avoided Emissions

Q. Does the filing meet the Board's stated goals?

A. Yes. The filing presents a cost-effective plan to enable the Company to meet the goals outlined in the Orders.

II. COST EFFECTIVENESS ANALYSIS OF EE&C PLAN II

Q. Did you analyze the cost effectiveness of the program portfolio in EE&C Plan II?

A. Yes. I prepared a cost-benefit analysis ("CBA") which calculates and details the results of the six tests prescribed in the MFRs as required by the Board. This entailed developing a model which analyzed measure-specific details and computed the estimated costs and savings of each program for use in the New Jersey Cost Test ("NJCT"), the Total Resource Cost Test, the Participant Cost Test, the Program Administrator Cost Test, the Ratepayer Impact Measure Test, and the Societal Cost Test. This testimony presents the methodology and results of the six CBA tests for the period of January 1, 2025 through June 30, 2027 ("Program Years 4, 5, and 6" or "PY4, PY5, and PY6").

Q. Please describe the CBA tests required by the Board's MFRs.

A. Section V.a. of the MFRs included as Attachment A (p. 46) to the July Order states: "The utility shall conduct a benefit-cost analysis of the programs and portfolio using the most recent [NJCT], including its most recent avoided cost methodologies, as a primary test. In addition, the utility shall conduct benefit-cost analysis using the Participant Cost Test,

Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective[,] i.e., that includes the combined financial costs and benefits realized by the utility and the customer as defined in the then-current version of the California Standard Practice Manual. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation."

Each test listed above is designed to provide a different perspective on the cost-effectiveness of the Programs. The six cost effectiveness tests prescribed by the Board assess cost effectiveness as follows:

- New Jersey Cost Test – The NJCT is the primary cost effectiveness test for EE and PDR programs in New Jersey. The test measures net costs of the program as a resource option based on total costs, like the Total Resource Cost Test, but also includes additional benefits to address specific state policy considerations in New Jersey, like the social benefit of avoiding harmful emissions.
- Societal Cost Test – The Societal Cost Test measures the net costs of a program as a resource option based on the total costs of the program, including both the participants' and the utility's costs. The Societal Cost Test differs from the Total Resource Cost Test in that it includes the effects of societal impacts, such as environmental impacts to the economy, excludes tax credit benefits, and uses a different (societal) discount rate.
- Total Resource Cost Test – The Total Resource Cost Test measures the net costs of a program as a resource option based on the total costs and benefits of the program, including for the participants and the utility.

- Participant Cost Test – The Participant Cost Test is the measure of the quantifiable benefits and costs from the perspective of program participants. Since many customers do not base their decision to participate in a program entirely on quantifiable variables, this test is not a complete measure of the benefits and costs of a program to a customer.
- Program Administrator Cost Test – The Program Administrator Cost Test measures the net costs of a program as a resource option based on the costs incurred by the program administrator or utility (including incentive costs) and excluding any net costs incurred by the participant. The benefits are similar to the Total Resource Cost Test benefits. Costs include the total program costs. This test measures the net economic impact of investing in EE and PDR programs from the perspective of the utility.
- Ratepayer Impact Measure Test – The Ratepayer Impact Measure Test measures impacts to customer rates due to changes in utility revenues and operating costs caused by the program.

In aggregate, these tests provide the Board with a comprehensive assessment of the benefits and costs associated with the Programs.

Q. Please describe your approach to assessing cost effectiveness using the six tests described above.

A. I completed all six tests using guidance from the Board's Order Adopting the updated NJCT, which was Attachment F to the Board's May Order, and the California Standard

Practice Manual.[1] The Orders provide specific guidance on how to estimate costs and benefits of programs, including assumptions on line losses and discount rate, for the NJCT. I applied the Board's guidance on the development of specific benefits and costs to all tests conducted.

Q. Did you evaluate all of the Programs using the six CBA tests required by the MFRs?

A. Yes, I evaluated the cost effectiveness of all of the Programs using each of the six tests required by the MFRs. The results of this analysis are presented in Appendix E to EE&C Plan II. The supporting workpapers for this analysis are shown in Schedule BJB-1.

Q. Please summarize your conclusions.

A. The JCP&L proposed portfolio of programs is cost effective under the NJCT with a cost benefit ratio of 2.5 and net benefits of approximately $695 million. All programs were cost effective under the NJCT, except the BD Program and the Next Generation Savings Program. The proposed portfolio also produces significant environmental benefits through reduced air emissions, including 4.7 million tons of carbon dioxide ("CO_2"), 695 tons of sulfur dioxide ("SO_2"), and 3,306 tons of nitrogen dioxide ("NO_X"). Finally, the programs will generate significant bill savings for participants, exceeding $1.5 billion over the life of the measures.

III. COST-BENEFIT ANALYSIS ASSUMPTIONS

Q. What methodology did you use to undertake these calculations?

A. I used the methodology prescribed by the NJCT attached to the May Order as Attachment F.

[1] *See* California Public Utilities Commission, *California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects* (2001), *available at* cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf.

Q. Please describe the program benefits considered in the CBA.

A. I considered the following components when calculating program benefits.

1. Avoided Wholesale Electric Energy Costs

Avoided wholesale electric energy costs represent the wholesale electric market purchases that would be avoided as a result of reductions in energy usage associated with the Programs.

2. Avoided Electric Ancillary Services Costs

Avoided electric ancillary services costs represent the wholesale electric ancillary service market purchases that would be avoided as a result of reductions in energy usage associated with the Programs.

3. Avoided Wholesale Electric Capacity Costs

Avoided wholesale electric capacity costs represent the wholesale reduction in PJM Interconnection LLC capacity as a result of the reductions in electric demand associated with the Programs.

4. Avoided Wholesale Natural Gas Costs

Avoided wholesale natural gas costs represent wholesale natural gas market purchases that would be avoided as a result of reduction in energy usage associated with the Programs.

5. Avoided Transmission and Distribution Costs

Avoided electric transmission and distribution costs represent the value of reduced investment in transmission and distribution infrastructure as a result of energy and demand savings associated with the Programs.

6. Avoided Retail Electric and Natural Gas Costs

Avoided retail electric and natural gas costs represent the actual bill savings to participants in the Programs. A key benefit of EE and PDR is reduced consumption by participants which results in reduced utility costs.

7. Customer Rebates and Incentives

Customer rebate and incentive costs represent the direct rebate incentives provided to participants in the Programs. Depending on perspective, customer rebates and incentive costs can either be a benefit to a program (to participants) or a cost to a program (to the utility and, ultimately, ratepayers). This benefit is only realized in the Participant Cost Test, as that test singles out the experience of participants in the Programs. The majority of customer rebates and incentives were coordinated among the New Jersey utilities participating in this proceeding.

8. Avoided Emissions Damages

Avoided emissions damages represent the economic value (also known as the avoided social cost) of reductions in CO_2, NO_x, and SO_2. EE programs displace power plant emissions, which reduce human health and environmental harms, also known as damages. Despite their real and quantifiable impact, I did not include any other criteria for air pollutants or greenhouse gases. This benefit was quantified in accordance with the NJCT guidance provided in the Orders. The avoided emissions impacts (in tons) are shown in Schedule BJB-2.

9. Non-Energy and Low-Income Adders

I applied the following adders as outlined in the NJCT guidance in the Orders:

- Energy Demand Reduction Induced Price Effects ("DRIPE") – 5% of avoided wholesale electric energy costs.
- Capacity DRIPE – 5% of avoided wholesale capacity costs.
- Natural gas DRIPE – 5% of avoided wholesale natural gas supply cost.
- Non energy benefits – 15% of avoided wholesale energy costs.
- Low- and Moderate-Income ("LMI") non-energy benefit – applied to 30% wholesale energy costs.

Q. Please describe the program costs considered in the CBA.

A. I considered the following components when calculating program costs:

1. Incremental Measure Costs

Incremental measure costs represent the incremental cost of participating in the Programs. This cost is calculated based upon the difference between the efficient measure costs assumed to install EE technologies and processes and the base measure cost assumed that a participant would otherwise pay without access to the proposed EE&C Plan II program. Incremental measure cost data was sourced from the Rutgers avoided cost study.[2]

2. Participant Costs

Participant costs represent the incremental costs paid by participants to participate in the Programs. This category includes both incremental costs paid by participants for the non-subsidized portion of EE costs, as well as loan repayments for programs offering financing.

[2] The study is available at: njcleanenergy.com/files/file/BPU/2023/Energy%20Efficiency%20Triennium%202%20Incremental%20Measurement%20Costs%20Memo%20(2023).pdf.

3. Program Administration Costs

Program administration costs represent JCP&L's cost to administer the Programs. These include costs for marketing, outside services, utility administration, inspections and quality control, and evaluation. These costs were developed based on JCP&L's experience delivering similar programs and guidance from the Board in the Orders.

4. Customer Rebate and Incentives Cost

Customer rebate and incentive costs represent the direct rebate incentives provided to participants in the Programs. These costs were developed through a coordinated approach with other New Jersey utilities and are based on existing EE and PDR programs in New Jersey and in other jurisdictions for similar measures.

5. Utility Lost Revenues

Utility lost revenues represent the value of distribution costs being avoided by participants in Programs that must be collected from the balance of ratepayers. These are not direct program costs and represent the transfer between existing ratepayer subsectors.

Utility lost revenues were calculated based upon the individual rate charges which currently contribute to supporting distribution costs. In addition, the utility lost revenues also include tariff surcharges and riders which do not contribute to distribution costs but would likely be reallocated to ratepayers at large. Utility lost revenues do not include any supply related costs, as New Jersey's electric and natural gas utilities are deregulated, and avoided supply costs resulting from EE are not borne by ratepayers.

Q. Did you exclude any costs when preparing the CBA?

A. Yes. I excluded several costs from the CBA. As set forth in the MFRs (*see* Attachment A to the July Order, p. 46), I did not include any costs associated with health and safety

measures in LMI programs, workforce development, and community outreach in program specific or portfolio level cost effectiveness testing as directed by the July Order.

Q. Is JCP&L requesting an exemption for the purposes of cost benefit for any specific program or initiative?

A. No. While two Programs in the JCP&L portfolio are not cost effective under the NJCT, the Company is not requesting any specific exemptions because the portfolio as a whole is still cost effective under the NJCT.

Q. Why is JCP&L including programs that are not cost effective under the NJCT in its portfolio?

A. The Company is including the BD Program in its portfolio in accordance with the July Order, which does not require this program to be cost effective, recognizing the start-up nature of BD Programs. The Company is including the Next Generation Savings Program in its portfolio because this program will identify, develop, and test new approaches with newer technologies to deliver energy savings and demand reduction to inform and potentially be included in future offerings and program portfolios. While MFR 1.f specifically allows for exemption for programs that introduce novel ideas where documentation supporting quantification of costs and benefits is not fully available, the Company is not requesting such exemption because the portfolio is cost effective under the NJCT.

Q. What assumptions did you use for measure-level energy savings?

A. My primary source to estimate measure-level energy savings is the New Jersey 2023 Triennial Technical Reference Manual for 2024 Filings (the "Manual") approved by the Board and included as Attachment C to the May Order.

Q. Did you make any adjustments to measure-level data for the purposes of CBA?

A. Yes, I made several adjustments as required by the Phase II Board Order. These adjustments included net to gross, realization rate, and in-service rates for applicable measures, as required by the Manual.

IV. CONCLUSION

Q. Please summarize your testimony and recommendations to the Board.

A. EE&C Plan II is a cost-effective portfolio of EE, PDR, and BD Programs that achieve the State's policy goals. The Programs will provide energy savings opportunities to all customers in the JCP&L service territory and ensure that LMI customers will have an opportunity to realize program benefits. The portfolio puts JCP&L on a trajectory to meet the PY5 energy savings target mandated in the Clean Energy Act.

The CBA shows that EE&C Plan II is cost effective under the NJCT with a cost benefit ratio of 2.5 and net benefits of approximately $695 million. These results indicate that the Programs will provide significant benefits to all JCP&L customers, while improving environmental quality and stimulating economic development. I recommend the Board approve EE&C Plan II as proposed.

Q. Does this conclude your testimony?

A. Yes. However, I reserve the right to update my testimony in the future.

Brendon J. Baatz **(231) 282-0585 | brendon@gabelassociates.com**

Professional Experience

Gabel Associates Inc. Highland Park, NJ
Vice President 2018-Present

- Support and advise clients on a variety of energy and regulatory issues including retail and wholesale electric rate design, energy efficiency policy and program design, cost benefit analysis, resource planning, and renewable energy project development.
- Provide ongoing consulting services to multiple gas and electric utilities on energy efficiency program design, cost benefit analysis, avoided cost development, strategic guidance, and program delivery in New Jersey.
- Advise various wholesale energy market clients, including power plant project developers and operators on regulatory issues such as retail ratemaking, wholesale ratemaking, RTO governance, FERC rulemakings, and other relevant issues.
- Provide technical expert testimony for various clients in regulatory matters before state energy commissions. Have testified in Arizona, Colorado, Indiana, Maryland, Montana, New Jersey, New Mexico, New York, Oklahoma, Pennsylvania, and Washington D.C

American Council for an Energy-Efficient Economy Washington, D.C.
Senior Manager, Utilities Program 2014-2018

- Led ACEEE's efforts related to utility sector energy efficiency programs. Served as project manager and lead author for research projects involving utility sector energy efficiency programs, business models, best practices, rate design, and other topics.
- Provided technical assistance for utilities and other energy efficiency implementation partners such as state government agencies on best practice program design and policy.
- Filed testimony and formal comments before state regulatory commissions on issues related to energy efficiency programs, integrated resource planning, rate design, and other issues related to the best practices and policies for implementing energy efficiency.

Federal Energy Regulatory Commission Washington, D.C.
Energy Industry Analyst 2013–2014

- Served as a technical expert in litigated cases before the Federal Energy Regulatory Commission on behalf of the FERC trial staff. Issues examined included: wholesale energy rates, transmission rates, Open Access Transmission Tariff interpretation, transmission capacity rights, cost allocation for various customer classes, formula rate mechanics and protocols, electric cost of service, interruptible load, rate design, and regional transmission organization functionality and governance.

Maryland Public Service Commission Baltimore, MD
Energy Analyst 2012–2013

- Reviewed and analyzed utility filings for EmPOWER Maryland statewide energy efficiency, conservation, and demand response programs. Presented results of research before the Commission. Worked closely with the Agency energy efficiency evaluation contractor to develop evaluation policies that reduced costs for Maryland ratepayers while ensuring integrity of the evaluation process.

Indiana Office of Utility Consumer Counselor — Indianapolis, IN
Utility Analyst — 2011–2012

- Served as a technical expert witness in utility cases before the Indiana Utility Regulatory Commission on behalf of utility ratepayers in the State of Indiana. Developed agency position through analyses of relevant utility applications, petitions, testimony, schedules, and exhibits. Served as agency representative in collaborative demand side management oversight boards for electric and gas utilities.

Education

Master of Public Affairs, Environmental Policy Analysis, Indiana University Bloomington, 2010

BS, Political Science and Sociology, Arizona State University, 2007

Selected Research Publications

B. Baatz, G. Relf, and S. Nowak. 2018. The Role of Energy Efficiency in a Distributed Energy Future. The Electricity Journal, Vol. 31, Issue 10. doi.org/10.1016/j.tej.2018.11.004.

B. Baatz, J. Barrett, and B. Stickles. 2018. Estimating the Value of Energy Efficiency to Reduce Wholesale Energy Price Volatility. Washington, DC: ACEEE. aceee.org/research-report/u1803.

B. Baatz, G. Relf, and M. Kelly. 2017. Consequences of Large Customer Opt Out: An Ohio Example. The Electricity Journal, Vol. 30, Issue 9. doi.org/10.1016/j.tej.2017.10.002.

B. Baatz. 2017. Rate Design Matters: The Intersection of Residential Rate Design and Energy Efficiency. Washington, DC: ACEEE. aceee.org/research-report/u1703.

B. Baatz and J. Barrett. 2017. Maryland Benefits: Examining the Results of EmPOWER Maryland through 2015. Washington, DC: ACEEE. aceee.org/research-report/u1701.

B. Baatz and A. Gilleo. 2016. Big Savers: Experiences and Recent History of Program Administrators Achieving High Levels of Electric Savings. The Electricity Journal, Vol. 29, Issue 8. doi.org/10.1016/j.tej.2016.09.009.

B. Baatz. 2015. Everyone Benefits: Practices and Recommendations for Utility System Benefits of Energy Efficiency. Washington, DC: ACEEE. aceee.org/everyone-benefits-practices-and-recommendations.

S. Nowak, B. Baatz, A. Gilleo, M. Kushler, M. Molina, and D. York. 2015. Beyond Carrots for Utilities: A National Review of Performance Incentives for Energy Efficiency. Washington, DC: ACEEE. aceee.org/beyond-carrots-utilities-national-review.

Selected Expert Witness Regulatory Cases

Arizona Public Service Company; Arizona Corporation Commission (Docket No. E-01345A-22-0144). June 5, 2023. Client: Southwest Energy Efficiency Partnership and Western Resource Advocates. Issues: wholesale energy market formation, demand side management cost recovery, various rider proposals.

Southwestern Public Service Company; New Mexico Public Regulation Commission (Case No. 22-00286-UT). April 21, 2023. Client: Coalition for Clean Affordable Energy. Issue: energy assistance program.

Tucson Electric Power Company; Arizona Corporation Commission (Docket No. E-01933A-22-0107. January 11, 2023. Client: Southwest Energy Efficiency Partnership and Western Resource Advocates. Issues: securitization, demand side management cost recovery, time of use rate structure, various rider proposals.

Northwestern Energy; Montana Public Service Commission (Docket No. 2022.07.078). December 19, 2022. Client: Human Resource Council District XI, Natural Resources Defense, and NW Energy Coalition.

Covanta Energy; Federal Energy Regulatory Commission (Docket Nos. ER-22-965-002, 996-002, 967-002, 968-002). February 1, 2022. Client: Covanta. Issue: reactive power ratemaking.

Ohio Power Company; Public Utilities Commission of Ohio; April 20, 2021 (Case No. 20-585-EL-AIR). Client: Ohio Environmental Council. Issue: energy efficiency programs.

Atlantic City Electric Company; New Jersey Board of Public Utilities; September 25, 2020 (Docket No. QO10010040). Client: Atlantic City Electric Company. Issue: cost benefit analysis and program design support for three-year energy efficiency plan.

New Jersey Natural Gas Company; New Jersey Board of Public Utilities; September 25, 2020 (Docket No. GO20090622). Client: New Jersey Natural Gas Company. Issue: cost benefit analysis for three-year energy efficiency filing.

Jersey Central Power and Light; New Jersey Board of Public Utilities; September 25, 2020 (Docket No. EO20090620). Client: Jersey Central Power and Light. Issue: cost benefit analysis for three-year energy efficiency filing.

Elizabethtown Gas; New Jersey Board of Public Utilities; July 31,2020 (Docket No. GR20070503). Client: Elizabethtown Gas. Issues: cost benefit analysis for energy efficiency true up filing.

Tucson Electric Power Company; Arizona Corporate Commission (Docket No. E- 01933A-19-0028); October 11, 2019. Client: Southwest Energy Efficiency Partnerships Issues: performance-based ratemaking, energy efficiency program cost recovery, time of use rate design, electric vehicle rate design.

Black Hills Colorado Electric; Public Utilities Commission of Colorado (Proceeding No. 18A-0676E), January 22, 2019. Client: Pueblo County, Colorado. Issue: time of use pilot proposal, low-income bill analysis.

Oklahoma Gas and Electric Company; Oklahoma Corporate Commission (Cause No. PUD 201800140); April 22, 2019. Client: Oklahoma Energy Results. Issues: prudence of environmental cost recovery for aged coal units, integrated resource planning assessment.

Lancaster Solid Waste Management Authority; Federal Energy Regulatory Commission (Docket No. ER19-342); November 14, 2018. Client: Lancaster Solid Waste Management Authority. Issue: reactive power ratemaking.

Elizabethtown Gas; New Jersey Board of Public Utilities (Docket No. GR18080860); August 8, 2018. Client: Elizabethtown Gas. Issues: cost benefit analysis for energy efficiency true up filing.

Duquesne Light Company; Pennsylvania Public Utility Commission (Docket R-2018-3000124); June 25, 2018. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: submetering for multifamily buildings, time of use rates, rate design.

Tucson Electric Power Company; Arizona Corporate Commission (Docket No. E- 01933A-15-0322); June 24, 2016. Client: Southwest Energy Efficiency Partnerships Issues: rate design, prepaid electricity.

PECO Electric Company; Pennsylvania Public Utility Commission (Docket R-2015-2468981); June 23, 2015. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: rate design, revenue decoupling.

PPL Electric Corporation; Pennsylvania Public Utility Commission (Docket R-2015-2469275); June 23, 2015. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: rate design, revenue decoupling.

Northern Indiana Public Service Company; Indiana Utility Regulatory Commission (Cause 44012); October 20, 2011. Representing Indiana Office of Utility Consumer Counselor. Issues: environmental control upgrades, alternate scenario economic analysis.

Indianapolis Power and Light Company; Indiana Utility Regulatory Commission (Cause 43623 DSM-5); April 26, 2012. Representing Indiana Office of Utility Consumer Counselor. Issue: energy efficiency performance incentive reconciliation.

Indianapolis Power and Light Company; Indiana Utility Regulatory Commission (Cause 44018); August 22, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: renewable energy feed in tariff design.

Indiana Michigan Power Company; Indiana Utility Regulatory Commission (Cause 44034); August 12, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: renewable energy credit benefit allocation.

Indiana Gas Company, Inc. and Indiana Gas and Electric Company; Indiana Utility Regulatory Commission (Cause 44019); May 20, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: revenue decoupling.

Jersey Central Power and Light
Efficiency Filing
CBA Workpapers (CONFIDENTIAL)

Schedule BJB-2
Summary of Avoided Emissions

Program	CO_2 Emissions Reduction (tons)	SO_2 Emissions Reduction (tons)	NOx Emissions Reduction (tons)
Energy Efficient Products	249,892	42	175
Whole Home	328,007	44	235
Income Qualified	131,569	10	99
Behavioral	39,506	10	26
Multifamily	121,993	8	92
Direct Install	1,799,373	180	1,321
Prescriptive / Custom	540,736	164	340
Energy Solutions	1,387,747	246	963
Load Optimization & PDR	-	-	-
Next Generation Savings	-	-	-
Conservation Voltage Reduction	23,675	6	16
Building Decarbonization	41,640	(15)	40
Total	**4,664,138**	**695**	**3,306**