



May 24, 2019

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: 2021 Technical Reference Manual and Tentative Order, Docket No. M2019 3006867

Dear Secretary Chiavetta:

The Pennsylvania Department of Environmental Protection (DEP) appreciates the opportunity to comment on the Pennsylvania Public Utility Commission's (PUC) Proposed 2021 Technical Reference Manual (TRM) and Tentative Order and encourages the PUC to continue improving the overall energy conservation and efficiency performance of the Act 129 program. Enhancing the program is one of the integral components of Pennsylvania's Climate Action Plan, because it benefits all Pennsylvania businesses and citizens.

DEP supports the TRM baseline assumptions based on Pennsylvania's recently updated building codes, allowing the Electric Distribution Companies (EDCs) to use territory-specific or gathered data when calculating savings such as balancing the integrity and accuracy of claimed energy savings estimates with costs incurred to measure and verify the claimed energy savings. DEP also supports updating the TRM assumptions based on the Statewide Evaluator's (SWE) residential and non-residential end-use saturation studies, as well as clarifying existing calculation methods. Additionally, DEP agrees that updating the Climate Assumptions based on the nine cities listed and the concomitant methodologies to calculate CDD (Cooling Degree Days) and HDD (Heating Degree Days) will better reflect the climate characteristics of Pennsylvania.

The proposed improvements in the TRM will provide regulators and energy efficiency program administrators the ability to evaluate, measure and verify the impacts of the Act 129 energy efficiency measures, projects and programs based on the most current set of practices and protocols. The TRM provides the necessary framework to ensure accurate and reasonable targets are being met, ratepayer funds are being spent judiciously, and customers are receiving the intended benefits from energy conservation and efficiency projects. The TRM should continue to evolve concurrently with changing regulations and policies and be updated periodically based on the most recent research findings on energy conservation and efficiency programs to allow the EDCs the flexibility to design programs for maximum benefits. The PUC's proposed 2021 TRM achieves these goals and will help standardize reporting processes, provide predictability in

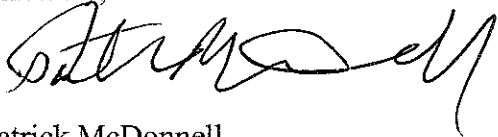
Secretary

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savings, and facilitate accurate savings estimates and calculations specific to Pennsylvania's energy and climate characteristics.

If you have any questions, please feel free to contact Jessica Shirley, Policy Director, by e-mail at jessshirley@pa.gov or by telephone at 717.783.8727.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick McDonnell". The signature is fluid and cursive, with a large initial "P" and "M".

Patrick McDonnell
Secretary