BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of) Ohio Edison Company, The Cleveland)		
Electric Illuminating Company, and the	Case Nos.	09-1947-EL-POR
Toledo Edison Company for Approval of)		09-1948-EL-POR
Their Energy Efficiency and Peak)		09-1949-EL-POR
Demand Reduction Program Portfolio)		
Plans for 2010 through 2012 and		
Associated Cost Recovery Mechanisms)		
)		
In the Matter of the Application of		
Ohio Edison Company, The Cleveland)	Case Nos.	09-1942-EL-EEC
Electric Illuminating Company, and the)		09-1943-EL-EEC
Toledo Edison Company for Approval)		09-1944-EL-EEC
of Their Initial Benchmark Reports)		
)		
In the Matter of the Energy Efficiency)		
and Peak Demand Reduction Program)	Case Nos.	09-580-EL-EEC
Portfolio of Ohio Edison Company, The)	2.1.3.2.1.1.2.1	09-581-EL-EEC
Cleveland Electric Illuminating Company,)		09-582-EL-EEC
and the Toledo Edison Company)		U) COM MIL MICO
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DIRECT TESTIMONY OF

GEOFFREY C. CRANDALL

ON BEHALF OF THE ENVIRONMENTAL LAW AND POLICY CENTER

Filed: February 17, 2010

1		INTRODUCTION AND BACKGROUND
2	Q.	What is your name and business address?
3	A.	My name is Geoffrey C. Crandall. My business address is MSB Energy Associates, Inc.
4		1800 Parmenter Street Suite 204, Middleton, Wisconsin 53562.
5	Q.	On whose behalf are you testifying today?
6	A.	I am testifying on behalf of the Environmental Law and Policy Center.
7	Q.	Please describe your background and experience in the field of gas and electric
8		utility regulation.
9	A.	I am a principal and the Vice President of MSB Energy Associates, Inc. I have over 35
10		years of experience in utility regulatory issues, including energy efficiency, conservation
11		and load management resources program design and implementation, resource planning,
12		restructuring, mergers, fuel, purchase power and gas cost recovery and planning analysis
13		and related issues. I have provided expert testimony before more than a dozen public
14		utility regulatory bodies throughout the United States. I have provided expert testimony
15		before the United States Congress on several occasions.
16		
17		My experience includes over 15 years of service on the Staff of the Michigan Public
18		Service Commission (MPSC). In my tenure at the MPSC, I served as an analyst in the
19		Electric Division (Rates and Tariff section) involving rate as well as fuel and purchase
20		power cases. I also served as the Technical Assistant to the Chief of Staff and Supervisor
21		of the Energy Conservation Section involving residential and commercial energy
22		efficiency programs. I also served as the Division Director of the Industrial, Commercial
23		and Institutional Division. In that capacity, I was Director of the Division that had

1 responsibility for the energy efficiency and conservation program design, funding, and 2 implementation of Michigan utility and DOE-funded programs and initiatives involving 3 Industrial, Commercial and Institutional gas and electric customers throughout Michigan. 4 5 In 1990, I was hired by MSB Energy Associates, Inc. and have served clients throughout 6 the United States on numerous projects related to energy efficiency and load management 7 program development, system planning, fuel, purchase power and gas cost recovery 8 assessments, electric restructuring, customer impact analyses, and other issues. My 9 curriculum vitae is attached as Exhibit GCC-1. 10 Q. What is the purpose of your testimony? 11 A. The purpose of my testimony is to address the reasonableness of the proposed 12 FirstEnergy Corp's (FirstEnergy) Energy Efficiency and Peak Demand Reduction 13 Program Portfolio Plan (EE&PDR) for 2010 through 2012 that was submitted jointly by 14 Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo 15 Edison Company on December 15, 2009 to the Public Utilities Commission of Ohio 16 (Commission or PUCO). I will refer to these three companies collectively as 17 "FirstEnergy." In my testimony I describe my assessment of the proposed EE&PDR plan 18 overall and make suggestions regarding modifications and improvements. 19 Q. Have you reached any conclusions concerning the EE&PDR submitted by 20 FirstEnergy? 21 A. Yes. My most significant concerns are 1) the inaccuracy of technology cost data used by 22 FirstEnergy in its analysis and modeling of potential energy efficiency technologies: 2) 23 the need for clear direction from the PUCO regarding accounting and program cost

tracking information; 3) the underutilization of solid state lighting (SSL) technologies; 4)
the suggested approach to Evaluation, Measurement and Verification (EMV) and; 5) the
need for heightened customer awareness of energy efficiency opportunities and consumer
education regarding energy use.

OVERALL ASSESSMENT OF THE PROPOSED EE & PDR PLAN

- 6 Q. Have you reviewed any documents or material in developing your opinions?
- 7 A. Yes.

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- 8 Q. What have you reviewed to develop your opinions on the EE&PDR Plan?
- 9 A. I have reviewed the application, testimony, exhibits, and responses to discovery questions
 10 in conjunction with this application. I have also reviewed the applicable statutory
 11 sections from the Ohio Revised Code.
- Q. Could you please describe the Applicant's plan for meeting the requirements of
 Ohio Revised Code Section 4928.66.
 - FirstEnergy has proposed an EE&PDR plan consisting of seventeen programs. The Plan includes programs for customers in the residential, low-income residential, small commercial, small industrial, large commercial, large industrial, and governmental customer sectors. Strategies to cover major energy consuming devices in homes, businesses and industry are addressed. The proposed programs include various energy efficiency and demand response technologies including the elimination of appliances and room air conditioners that are underutilized and inefficient as well as more efficient appliances, lighting, heating and cooling equipment, and measures to improve the efficiency of existing equipment.
 - Q. What is your overall opinion of the EE&PDR plan submitted?

1 A. I believe there are a number of program flaws that are contained in this application. I
2 explain my specific concerns and recommendations below.

3

NEED FOR ENERGY AWARENESS AND CONSUMER EDUCATIONAL EMPHASIS

- 4 Q. Do you have concerns regarding the proposed EE&PDR programs with respect to consumer awareness and energy use education?
- A. Yes. The proposed EE&PDR plan does not include strategies or a sufficient level of
 effort to build customer awareness of energy efficiency options and the desirable impacts
 that result from energy efficiency. The proposed EE&PDR plan needs to be modified to
 include more emphasis on educational and consumer awareness of the energy and dollar
 impact of decisions consumers make in selecting and using appliances, TV sets,
 entertainment systems, and plug loads.
- 12 Q. Specifically, what is the concern regarding customer use of home electronic equipment?
- 14 A. The proliferation of consumer electronics is resulting in an increased need for electricity. 15 Examples of consumer electronics include XBOX 360, Playstations, Blue-ray DVD 16 players, big screen high-definition plasma, and Liquid Crystal Display (LCD) TV sets. 17 These products are gaining in popularity. The Environmental Protection Agency (EPA) 18 estimates that in the United States there are approximately 1.5 billion power supplies that 19 are used in various devices. These power supplies consume about 300 billion kilowatt-20 hours (KWh) per year, or about 11% of the national annual electricity usage. The 21 expected rate of growth for these power supplies is expected to be 49% in the commercial 22 sector, 3% in the industrial sector and 27% in the residential sector from 2005 to 2030, 23 according to the U.S. Department of Energy's Energy Outlook 2008. According to the

EPA, LCD TV sets typically use less energy than comparable plasma sets. A typical 28-inch conventional cathode ray tube (CRT) set uses about 100 watts of electricity. A typical 42-inch LCD set might consume twice that amount, while a plasma set could use five times as much, depending on the model and the programming. Furthermore, the EPA indicates that for the largest screen sizes (60 inches and up), projection TVs are quite energy efficient, using 150-200 watts—which is far less than the energy a plasma set would use.

EPA now includes TV systems in their ENERGY STAR labeling program. The requirements in effect today, are that the ENERGY STAR rated units use up to 30% less energy then their counterparts. In September 2009, the EPA adopted a new ENERGY STAR version 4.0 and 5.0 for TV sets. See Exhibit GCC-2. The criteria for Version 4.0 that takes effect in May 2010, will offer consumers a savings of more than 40%. Version 5.0, which takes effect May 2012 includes ENERGY STAR qualified TVs that will be as much as 65 percent more efficient than models currently on the market.

The implications of the increased use of energy attributable to consumer electronics has not gone unnoticed in other states. California has recently reacted to this phenomenon. In November 2009, the California Energy Commission (CEC) approved mandatory energy efficiency standards for TVs. See Exhibit GCC- 3. The standard requires that beginning in 2011, televisions sold in California would consume 33% less energy. Beginning in 2013, televisions sold in the state would consume 49% less energy. For example, a 36-inch screen would consume 148 watts by 2011 and 95 watts by 2013.

According to the CEC, the savings to the consumer will be between \$50 and \$250 over the life of the TV.

Ohio has ample potential to reduce plug load inefficiencies. In the study done by the American Council for an Energy-Efficient Economy in March 2009, over 1,000 gigawatthours (GWh) of savings from plug loads was identified for Ohio. Plug load energy efficiency had the second lowest cost of only \$0.024/kWh. See Table 2 (page 13) of the ACEEE report.

A.

- Growth in sales of high definition plasma, large screen TV's and other consumer electronics in the FirstEnergy service territory has the potential to unravel and negate energy savings resulting from implementation of FirstEnergy's EE&PRD plan.
- Q. Please explain the opportunities to improve energy efficiency involving consumer electronics and plug loads.
 - Numerous appliances and devices are consuming electricity without the customers' knowledge. This is commonly referred to as "phantom load." Home office equipment, often uses stand-by ("phantom") power load that can range from a few watts to as much as 40 watts for each piece of equipment. One way to mitigate this problem is to use a power strip that provides a means to completely disconnect the power supply from the power source thereby eliminating the wasteful use of electricity. FirstEnergy is to be commended for having recognized this. They have proposed, in their programs, power strips to help customers capture those savings. However, FirstEnergy has not included aggressive customer information and consumer awareness efforts to ensure that their

1	customers are aware of phantom load and the means to reduce this unintentional use. A
2	good example of information being provided to its customers by an electric utility is
3	attached in Exhibit GCC- 4.

- 4 Q. What other consumer education tools are available to help reduce electricity consumption?
- A. Beyond consumer electronics, customers are often unaware of common everyday

 opportunities such as reducing hot water temperatures, setting the interior temperature

 levels for both winter and summer and by using programmable thermostats. Customers

 also need to be aware of using infiltration gaskets on exterior walls, keeping their heating

 and cooling system well maintained, closing storm windows in the winter, use of flow

 restrictors in showers and faucets, and using occupancy sensors to reduce unnecessary

 use of lighting. These are important aspects that should not be overlooked.
- Q. Does the EE&PDR plan as submitted fail to address these customer education issues?

Α.

Yes. FirstEnergy's proposed EE & PDR plan is deficient because it does not place sufficient emphasis on consumer education and building public awareness. FirstEnergy needs to initiate an aggressive customer information program including use of speaker bureaus, public service announcements, bill inserts, and website resources to inform its customers of the EE&PDR programs. It also needs to disseminate information to its customers to inform them as to the actions they can take to reduce the wasteful use of energy. Proper safeguards will need to be in effect to ensure the focus is on awareness of energy efficiency opportunities and not image building for the utilities.

1	Q.	What action do you recommend the Public Utilities Commission of Ohio take
2		regarding consumer electronic goods that may impact energy efficiency projects?
3	A.	As a condition of approving the plan, the PUCO should require FirstEnergy to include
4		additional strategies to heighten public awareness of energy efficiency and opportunities
5		in its implementation plan, such as those listed above. The PUCO should require that
6		FirstEnergy work with the collaborative group and other interested parties to expand and
7		increase the emphasis of its public awareness, with special emphasis on energy
8		consumption of TVs, home entertainment systems, and phantom power loads over this
9		three-year plan period.
10		PROPOSED LIGHTING TECHNOLOGY
11	Q.	Do you have any specific concerns regarding the proposed lighting technologies
12		included in the EE&PDR plan?
13	A.	Yes. In reviewing the EE&PDR plan application and related materials, it appears that
14		several lighting measures and technologies were included in formulating the proposed
15		EE&PDR plan. However, solid state lighting (SSL) technologies are becoming more and
16		more promising and FirstEnergy erred by not including additional SSL measures in this
17		proposed three-year plan.
18	Q.	Does FirstEnergy's plan include any SSL technologies?
19	A.	Yes. FirstEnergy's application includes Light Emitting Diode (LED) technology, such as
20		exit lights (retrofit only), pedestrian signals, and traffic signals.
21	Q.	What other SSL technologies are available for use today?
22	A.	There are several new products, such as: parking lights, outdoor wall mounted porch
23		lights, outdoor pathway lights, recessed down lights, desk lamps, under kitchen cabinet

lighting, surface mounted down lights, interior lighting, strip lighting, and commercial refrigeration lights. The US EPA has recently published a list of ENERGY STAR approved residential SSL lighting technologies. See Exhibit GCC-5.

Q. How does the EE&PDR plan fail to adequately address SSL technology?

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In two ways, first an insufficient number of SSL lighting technologies are included in their proposed lighting programs. Other Midwestern utilities include considerably more SSL lighting options in their energy efficiency programs than is being proposed by First Energy. I have provided examples of these other LED incentive programs in Exhibits GCC-6, GCC-7 and GCC-8. In addition, FirstEnergy needs to develop an in-depth understanding of the operational characteristics and application of this new lighting technology. Even though FirstEnergy included some SSL applications, it did not include a concentrated and focused demonstration pilot for new interior and exterior SSL applications in Ohio. Because the plans will not be revisited for another three years, it is important that an SSL pilot program be initiated during this planning cycle and as soon as possible.

Q. Are other SSL pilots now underway in other states?

Yes. Such a pilot is being initiated in Iowa. MidAmerican Energy Company and Interstate Power Company are currently developing a SSL/LED pilot project in conjunction with the Iowa Energy Center based in Ames, Iowa. The purpose of that effort will be to gain a better understanding of the operating characteristics and application possibilities of SSL and LED technologies. In addition, an SSL pilot has just been announced in Michigan. The Michigan Department of Energy, Labor and Economic Growth (DLEG) recently granted \$17.4 million for LED Demonstration

Grants. These grants will be available to local governments to assist with projects using LED products, to both reduce energy use and increase public awareness of LED technology. The measures in this pilot include LED/Solid State Lighting for various high-demand applications such as exterior parking, street and traffic lighting. Grants will fund much of the lighting hardware costs for equipment. Recipients will cover a portion of the lighting hardware costs plus installation and labor costs. After the LED project has been installed, the recipients will help educate the public on the technology through various means including the media, community functions, and signs.

According to comments made by DLEG's Director Pruss indicated, "...These projects will enhance Michigan's ability to achieve its energy efficiency goals and support the energy needs and priorities of local communities, while creating or retaining thousands of jobs across the state."

Q. What is your recommendation regarding SSL programs?

I recommend that FirstEnergy initiate a pilot project to gain experience with SSL applications and better understand its operating characteristics, strengths, weaknesses and any unique applications or qualities it may have. Exterior solid state lighting, such as that which is designed to replace parking lot, street and exterior security lighting systems should also be included in this pilot project. The PUCO should require FirstEnergy to implement a SSL pilot in conjunction with this application and not defer this until the next EE&PDR planning cycle. An example of a SSL demonstration pilot is provided in Exhibit GCC-9.

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ACCOUNTING TREATMENT AND TRACKING OF EXPENSES

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2	Q.	Do you have concerns regarding the financial controls and accounting system that
3		needs to be in place to ensure proper tracking and use of ratepayer funded activities
4		by FirstEnergy and its contractors?

Yes. FirstEnergy has not explained its plans specifically for internal financial controls and the tracking of funds. These are new activities for FirstEnergy and tens of millions of dollars will be flowing between ratepayers, FirstEnergy, program contractors, vendors, trade allies, and participating consumers. FirstEnergy needs to take the appropriate steps to ensure proper tracking and control of these funds. The appropriate use of personnel, equipment, vehicles, new purchases, marketing and advertising resources, and administrative support must be carefully scrutinized. The PUCO should ensure that FirstEnergy is setting up its accounting systems appropriately so that allocations include only legitimate costs from related incremental activities and that there is a clear audit trail which can be audited by the PUCO staff or their designees.

What recommendations do you have to ensure that FirstEnergy's accounting system only allocates legitimate costs from incremental activities?

FirstEnergy should work with the PUCO staff to determine the appropriate accounting treatment and tracking of costs and revenues associated with the EE&PDR plan. The PUCO staff should provide guidance through written correspondence that describes the proper accounts and subaccounts for recording and tracking of qualified costs attributable to the EE&PDR programs. This will ensure that should a financial audit be conducted on these activities, the audit team will have a clear disaggregation of the relevant costs and revenues.

EVALUATION, MEASUREMENT A	ND.	VERIF	ICATION
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- Q. Do you agree with FirstEnergy's proposed approach for evaluation, measurement and verification?
- 4 A. No. I believe there are serious problems with the proposed EMV strategy.
- 5 Q. Why is a strong EMV program necessary?

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- 6 The evaluation of energy efficiency programs requires close attention. It will be essential A. 7 that the EMV team be comprised of evaluation professionals who have the expertise and 8 independence to complete a credible analysis. The evaluation team needs to have the 9 expertise and understanding of various standard evaluation approaches including familiarity with engineering derived estimations, data collection for interviews, weather normalization, 10 11 building simulation modeling, billing analysis, useful life estimates, free rider and free driver 12 assessments and net-to-gross analyses, and unbiased surveys. Sound analytical methods should be applied and the results rendered within a framework of independence that provides 13 14 trustworthy, objective and unbiased information.
- Does the establishment of the statewide Independent Program Evaluator position alone provide the necessary independence and protections that is important to a sound EMV framework?
- 18 A. No. However, this is an excellent means of cross checking and should be very helpful in
 19 achieving independence with the evaluation function. A proper EMV process provides
 20 feedback and performance results within a decision-making framework. This enables
 21 program implementers to enhance ongoing operations as well as modify programs in the
 22 future. The Ohio EMV framework overall is consistent with this approach, and should
 23 provide for timely and meaningful program adjustments, if needed.

- 1 O. What are your main concerns regarding the proposed EMV strategy in
- 2 FirstEnergy's EE&PDR filing?
- 3 A. My first concern is the suggested method of selecting and managing the FirstEnergy
- 4 EMV contractor. My second is the verification of legitimate and discernable savings
- 5 resulting from activities related to the EE&PDR plan.
- 6 Q. Why do you have concerns about the EMV team contractual relationship?
- 7 A. On page 7 of its EE& PDR Plan, FirstEnergy proposes that it be authorized to hire an
- 8 evaluator contractor to analyze activities related to the plan. As proposed, FirstEnergy
- 9 would have the ability to unilaterally dismiss the ratepayer-funded EMV contractor. This
- contractual arrangement could result in process and impact evaluation reports that may
- lack independence and credibility. The contract terms will include the standard
- requirements for performance, deliverables, time lines, etc. However, because
- measurement and savings attributable to the plan is an essential task and these costs will
- be funded by the ratepayers, I recommend that a firewall be established between
- FirstEnergy and its EMV contractor. The EMV team needs to have independence and
- autonomy to do its work. Integrity of this process is of paramount importance to the long
- run viability of these programs. A safeguard needs to be inserted in this process such that
- the EMV contractor cannot be unduly influenced by FirstEnergy. Dismissal of the EMV
- contractor should only be allowed with the prior consent of the PUCO, PUCO staff, or
- the unanimous consent of several designated entities in the collaborative. The PUCO
- should determine, in this proceeding, that this is an important safeguard that should be
- 22 established and designate who will have the responsibility to authorize dismissal of
- FirstEnergy's EMV contractor, should that situation arise.

Q. What is your concern over the verification of savings in the EE&PDR plan?

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My second concern is to ensure that only verified, bona fide savings resulting directly from FirstEnergy's EE&PDR activities are reflected in the savings towards meeting the legislatively mandated savings targets. This is a very important principle that is central to properly conducted impact evaluations. The EMV function needs to carefully screen which activities are eligible to be counted towards compliance with the targets. This is a very important task for the statewide Independent Program Evaluator as well as the EMV team that is going to be hired directly by FirstEnergy. As an example of a violation of the verification principle, the savings identified in Appendix G, C&I Energy Efficiency Compliance "Historical Transmission and Distribution Programs," of 27,217 MWh are unrelated to the incremental new activities that are identified in the plan because the savings are from historical projects and not eligible for counting towards the requirements. Granting savings credit for these historical activities conducted prior to the legislatively established EE&PDR programs would be the ultimate example of "freeridership," i.e., claiming savings for actions that were not at all the result of the EE&PDR programs. This would be like being hired for a new job and asking the boss to pay you for two years of earlier work you did for your previous employer. The EMV methodology must be careful to separate out and not allow the inclusion of tangential and unrelated activities that have been completed prior to the initiation of the EE&PDR programs. Similarly, savings attributable to the self-directed mercantile customers must not be allowed unless they are properly verified in a manner that is satisfactory to the statewide Independent Program Evaluator.

1	Q.	What recommendations do you have regarding FirstEnergy's EMV program and
2		proposals?

A.

First, FirstEnergy needs to hire qualified EMV contractors with the understanding that should FirstEnergy seek to dismiss the contractor, this may be done, but only after it has been expressly permitted by the PUCO or its designee. Second, only legitimate savings resulting directly from the (new) activities included in the EE&PDR are eligible to be counted towards the legislatively mandated savings targets. Third, the statewide Independent Program Evaluator will be responsible to coordinate and oversee EMV functions involving all the participating utilities. To minimize inefficiencies, duplication of efforts, and enhance compatibility of information, FirstEnergy should coordinate its: methodologies, data collection instruments, analyses, reports, status report formats and related work with the statewide Independent Program Evaluator.

PROGRAM CONTINUITY

- Q. What are the impacts associated with starting and stopping energy efficiency or peak demand reduction programs during the implementation process?
- 16 A. Starting and stopping programs during the course of a program can be very disruptive as
 17 well as costly.
- Q. Why do you think there is a potential for the programs to stop and start throughout the course of the year they are implemented?
- A. In my experience with implementing energy efficiency programs, it is very difficult to predict how well new programs and incentives will be received by customers. What I would expect is that some of the programs will be very well received and may cause a surge in customer demand. The demand might be so intense as to deplete the incentives

available for the program year. At that point, program administrators will have to decide how to react to this oversubscription. Should they shut the program down? Should they continue to receive and process requests and develop long backlogs or should they redirect incentive funds from other programs that have not been as well received? These circumstances should be anticipated by program implementers.

What are the likely results should FirstEnergy's programs be interrupted?

Trade ally coordination, training, and relationship building will be crucial to the delivery and ultimate success of FirstEnergy's programs and must be given high priority. Because FirstEnergy customers, retailers, and trade allies have somewhat limited experience with utility rebate and incentive programs, FirstEnergy has decided to elevate customer incentive levels to help jump-start the programs and attract customer interest over the first six months. It is a good idea to front-load the customer incentive levels to quickly attract customer interest. It will be important to minimize customer hassle, confusion and barriers to their participation.

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In reviewing the proposed plan, I am concerned that no accommodation has been made to avoid starting and stopping incentives and programs. I suggest that this be addressed specifically by FirstEnergy in planning the implementation and within the contracts with third party implementers. Otherwise, customer and trade ally confusion, hassle, and irritation could result which would diminish the effectiveness of the programs.

Q. What recommendations do you have to minimize potential impacts resulting from the potential starting and stopping of programs?

A. First Energy will need to keep abreast of its program incentives and budgets as it implements the programs. It will need to closely track and forecast the funds used and still available for customer and trade alley incentives. It will also need to adjust its budgets accordingly to ensure that the programs are well managed.

PROPOSED FAST TRACK CFL PROGRAM

- Q. Are you familiar with the four programs FirstEnergy has designated for "Fast
 Track" implementation?
- 8 A. Yes. These are the compact fluorescent light (CFL) bulb, appliance turn-in, commercial and industrial lighting, and commercial and industrial motors programs.
- 10 Q. What concerns do you have regarding the CFL program?

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- In reviewing the proposed CFL program, it appears that this program as designed would 11 A. have a high likelihood of robust customer participation levels using high quality energy 12 efficient lighting technology. A big unknown is customer receptiveness given the 13 customer pushback resulting from the failed launch of FirstEnergy's earlier CFL 14 program. It is my understanding the program has a limitation of six bulbs per customer 15 purchase, which is a reasonable approach. Disposal of CFL's is a very important element 16 of this program and was not addressed in the plan filing. Disposal of CFL's at a 17 convenient location for the consumer needs to be included in this program. 18
- 19 Q. Do you have recommendations regarding the implementation of this program?
- 20 A. Yes. FirstEnergy needs to establish an effective plan and work closely with its trade
 21 allies to ensure that there is an effective, hassle-free, and convenient way for customers to
 22 dispose of inoperative fluorescent and CFL lights. The CFL point of purchase is an ideal
 23 location to help customers with the disposal of inoperative CFL and fluorescent lights.

Q. Do you have any suggestions regarding the marketing of this program?

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Yes. Reference is made to EISA and the efficient lighting technology that will be mandatorily phased in, beginning in 2012. In an effort to enhance implementation of the CFL program as well as encourage efficient lighting technology and coordinate efforts with EISA, I recommend that FirstEnergy offer an incandescent light bulb turn-in initiative. This marketing approach could be used with residential customers, both homeowners and renters, as well as small business customers. Under this incentive, if the customer turns in four functional 100-watt bulbs they would be eligible to receive two compact fluorescent bulbs at no charge, having an equivalent light output to a 100-watt incandescent bulb. This turn-in program would improve customer awareness of new highly efficient and less costly lighting technologies as well as provide for the disposal of the old inefficient lights in an environmentally responsible manner. It would also help to stimulate and increase customer participation in the CFL program. In addition, FirstEnergy would coordinate efforts with EISA and accelerate the early replacement and removal of wasteful and inefficient lighting that is currently in operation in its Ohio service territory. The sooner inefficient lighting in use now, in Ohio, is purged and replaced with high efficiency equipment, the sooner customers will benefit and the sooner FirstEnergy's system will benefit.

PROPOSED FAST TRACK APPLIANCE RECYCLING PROGRAM

What concerns do you have regarding the appliance recycling program?

I see the merit of this program and believe it is well designed overall. However, I believe that the proposed (initial six-month) incentive of \$75 for the refrigerator and freezer is not needed to make this program successful. I believe it is reasonable to offer a

1		customer incentive of \$50 for the first six months and then \$35 after the initial period. It
2		is my understanding that other utilities in Ohio will be offering rebates in the range of
3		\$35. In my experience, I have seen rebate levels for the appliance turn-in of refrigerators
4		to be more in line with the \$35 range. To minimize customer confusion it may be useful
5		in the long run to coordinate these incentives with similar programs in Ohio.
6		FirstEnergy's proposed \$35 incentive level for refrigerators and freezers appears
7		reasonable.
8	Q.	Do you have suggestions regarding the design or implementation of the appliance
9		turn in program?
10	A.	Yes. FirstEnergy should conduct random, unannounced inspections of its recycling
11		contractor. This quality control function should be done to ensure that the affected
12		appliances are not finding their way back into operation in Ohio or elsewhere.
13	Q.	Do you have additional suggestions regarding the marketing of this program?
14	A.	Yes, in order to improve program effectiveness, FirstEnergy and its contractors should
15		develop marketing strategies targeted to customers who sign up for an appliance pick up
16		but change their mind and back out. This should be anticipated and special efforts should
17		be directed to customers who get cold feet.
18		PROPOSED FAST TRACK C&I EQUIPMENT PROGRAM (LIGHTING)
19	Q.	What concerns do you have regarding the C&I Lighting program?
20	A.	I believe this program has merit and should be approved. However, I believe the
21		modeling and analysis used inaccurate costs of lighting technology for this program.
22		After having reviewed the modeling that was done by FirstEnergy's program design
23		team, I believe that the costs of certain lighting measures and technologies were

estimated to be higher that is justifiable. The input values and technology costs were

apparently derived from the Ohio TRM, Michigan Demand Energy Measures Database,

California DEER and FirstEnergy's program design contractor database. For example,

the cost relied upon for T-8 lighting, four-foot, four-unit fixture is nearly \$150. However,

a non-decorative T-8, four light, four-foot fixture and bulbs can be obtained in Ohio for

slightly more than one-third of the cost analyzed.

7 Q. Why do you think the costs used were too high?

A.

- Upon my review of calculations done on the T-8 replacement technology, I noted that the cost of the fixture and tubes appeared compared to be higher than normal. I called a retailer in Ohio to check the cost of this equipment. They indicated that a non-decorative T-8 light fixture with electronic ballast that would accommodate four, 48-inch, T-8 premium bulbs costs approximately \$50. To reflect that \$100 cost differential would very likely move that program into a TRC range exceeding 1.0. Commercial lighting programs are typically cost effective programs due to the energy use differential, long hours of use, long useful life of measures, the market potential, applicability and the ease of installation.
- Q. Do you have suggestions regarding the design or implementation of the C&I

 Equipment Program (LIGHTING)?
- Yes. FirstEnergy needs to collect lighting technology data as it implements this program.

 This will enable it to capture the actual costs of lighting equipment purchased and installed in its service territory and to perform a more accurate analysis of the benefits and costs of C&I lighting programs.

1	-	NEED FOR ADDITIONAL COST AND OPERATIONAL DATA IN DEVELOPING
2		<u>PROGRAMS</u>
3	Q.	Have you reviewed the modeling process that FirstEnergy uses to evaluate and
4		predict the impacts of its programs?
5	A.	Yes.
6	Q.	Do you have concerns over the modeling process FirstEnergy uses?
7	A.	Yes. I believe that more accurate cost and operational information needs to be developed
8		for use in the analysis and design of energy efficiency programs by First Energy.
9	Q.	The utility plans are based on technologies using the California Database for Energy
10		Efficiency Resources (DEER database), DEMD, ACEEE information and in-house
11		technology information. Is this adequate?
12	A.	No. I believe that FirstEnergy and the Ohio utilities need to create or gain access to a
13		revised technology database to better understand the costs and operating characteristics of
14		various energy efficiency technology and program elements. This need not be done prior
15		to initiating these programs; however, it should be conducted over the next several years
16		to enhance planning for subsequent years.
17		FIRSTENERGY COLLABORATIVE PROCESS
18	Q.	Do you believe that a stakeholder input/collaborative process would be useful in
19		developing, implementing, and evaluating these energy efficiency and demand
20		response programs?
21	A.	Yes. A FirstEnergy collaborative working group should be an ongoing activity in Ohio
22		with regularly scheduled meetings and full participation by interested parties. It is not
23		very effective or useful to assemble a collaborative group sporadically and only in

response to serious program difficulties. A systematic process for the two-way exchange of ideas needs to be developed to assist FirstEnergy program implementers to develop, modify, and continuously refine programs.

Q. How should an ongoing stakeholder collaborative process operate?

Q.

A.

A.

Having been involved in a number of collaborative working groups, I have found that ongoing stakeholder involvement is critical to the design, implementation, monitoring, evaluation, modification, or elimination of ineffective programs or those no longer needed. In light of the developments with the American Reinvestment and Recovery Act (ARRA) and other federal developments, a meaningful stakeholder and public input process is needed to enhance coordination. Initiatives such as the Energy Independence Security Act (EISA), the National Energy Conservation Policy Act 2005 (NECPA) need to be coordinated with the EE&PDR programs to improve implementation effectiveness and customer acceptance.

What type of participants should be included and are there minimum standards or requirements that should be accepted by a collaborative working group participant? Stakeholder participants should include any interested party who is willing take the time and effort to participate actively in the stakeholder process. In order for the process to be workable and useful, those who are on the collaborative work group need to agree; 1)

Demonstrate a commitment to the working group process by reviewing the pre-meeting materials, 2) investing the time and effort and attend the meetings, and 3) participants need to provide input and actively participate at the meetings.

Q. What are your recommendations for the FirstEnergy collaborative going forward?

I believe that the stakeholder group should meet at least quarterly. This group's objective would be to make program improvements to existing programs, offer ideas to enhance customer acceptance and marketing strategies, and to act as a sounding board to help sort out implementation and coordination strategies. The collaborative process should not simply be a series of presentations to the group but should allow for discussion and input into the on-going implementation of the plan. The collaborative group could add value by informing FirstEnergy implementers of current market conditions, new developments e.g. new federal, state or local laws, product delivery and manufacturing problems. It may also be useful in shaping marketing strategies, becoming aware of backlog problems with related programs, etc. The collaborative group should be kept informed of budget, cost recovery, and financial activities to assess whether any mid-course corrections are needed. Recommendations resulting from the collaborative group would be advisory in nature and non-binding on FirstEnergy; however, it would serve to assist program implementers as they strive to implement the EE&PDR initiative.

<u>SUMMARY</u>

- Q. Could you please summarize your conclusions & recommendations regarding
 FirstEnergy's proposed EE&PDR plan?
- 18 A. Yes. A summary of my key issues are as follows:

A.

Increased emphasis needs to be placed on customer awareness of energy
efficiency and consumer education. Special efforts should be made to target
phantom load, entertainment systems, and plasma televisions and other household
uses of energy.

Not enough SSL lighting technologies have been included in the proposed
 EE&PDR plan. Additional SSL technologies should be included in this plan and
 FirstEnergy should initiate a SSL Pilot to gain additional operational experience
 with interior and exterior SSL lighting systems in its service territory.

- The impacts resulting from the Energy Independence Security Act of 2007
 (EISA), the National Energy Conservation Policy Act of 2005 (NECPA) and
 American Reinvestment and Recovery Act (ARRA) need to be integrated into the
 design, implementation and ongoing management of the EE&PDR.
- In addition to the creation and revision of the Ohio Technical Resource Manual (TRM), a detailed database needs to be developed by FirstEnergy. This energy efficiency and demand response technology and practices database will provide improved and more precise information on the costs and savings of energy efficiency measures and demand response technologies. This information is needed to evaluate programs included in the EE&PDR and will be useful in redesigning the existing programs (if appropriate) as well as developing new programs in the future.
- The Commission needs to ensure that appropriate accounting methodology,
 categorization and tracking of costs is done properly.
- The underlying technology costs and inputs for FirstEnergy's energy efficiency
 program design modeling are flawed and unacceptable. More accurate cost data
 needs to be acquired by FirstEnergy.

- The proposed incentive levels contained in the EE&PDR with respect to the appliance turn in program needs adjustment and should not be authorized as proposed.
 - The proposed approach to evaluation, measurement and verification needs to be
 modified especially with respect to the autonomy and independence of the EMV
 team that will be hired by FirstEnergy. The PUCO needs to ensure that ratepayer
 supported EMV contractors are autonomous and independent.
 - The FirstEnergy EMV contractor needs to closely coordinate with the statewide implementation program evaluator and jointly establish protocols, procedures, data collection, tracking formats and report formats, etc. to minimize inefficiencies and duplication of effort.
 - Mitigation of any potential environmental damages from the disposal of CFL's
 and fluorescent lighting needs to be explicitly addressed and effectively handled
 by FirstEnergy as the programs are implemented.
 - An effective, on-going stakeholder process is needed to enhance the implementation of FirstEnergy's EE&PDR. Such a process would assist in coordinating related activities in the State.
- 18 Q. Does this complete your testimony?
- 19 A. Yes.

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Geoffrey C. Crandall

Vice President and Principal

EDUCATION

B.S. in Business and Pre-Law, Western Michigan University, 1974.

Mr. Crandall has also completed courses at Michigan State University Graduate School, the University of Wisconsin-Madison and Wayne State University, in areas of federal taxation, accounting, management and the economics of utility regulation. Mr. Crandall also completed the examination for the National Conference of States on Building Codes and Standards Energy Auditor.

EXPERIENCE

Mr. Crandall joined MSB in January 1990. He specializes in residential and low-income issues, the impact of energy efficiency and utility restructuring on customers. Mr. Crandall has addressed issues related to energy efficiency and residential customers and utility restructuring in California, New York, Colorado, Iowa, and Michigan. He has analyzed and/or designed energy efficiency programs for residential customers in Michigan, Georgia, Wisconsin, Arizona, and New Orleans, and has conducted workshops on low-income restructuring and energy efficiency issues in over 20 states, including Washington, Hawaii, Nevada, Kansas, Michigan, Rhode Island, California, Virginia, and New Orleans. In the energy efficiency area, Mr. Crandall has analyzed and proposed modifications to utility demand-side programs in the states of Arizona, Georgia, Hawaii, Illinois, Maine, Michigan, Minnesota, North Carolina, Ohio, Pennsylvania, Utah, Washington State, California, Iowa, Montana, Colorado, Missouri, Virginia, Wisconsin, and Washington D.C.

Prior to joining MSB, Mr. Crandall was employed by the Michigan Public Service Commission from 1974 through 1989, where he served as the Director of the Demand-Side Management Division. He was responsible for the development, implementation and monitoring of government- and utility-sponsored demand-side management, energy-efficiency and conservation policies and programs. These activities involved customers in the residential, commercial, industrial and institutional sectors. He was responsible for both pilot and full-scale programs, and conducted demand-side program design and implementation. Mr. Crandall is familiar with marketing strategies, segmentation and market-penetration analyses, as well as the implementation of successful demand-side programs.

Mr. Crandall has dealt with a wide variety of regulatory issues beyond energy conservation, including utility diversification, non-traditional regulatory concepts, incentive regulation, utility billing practices, utility power plant maintenance and management of plant outages.

Mr. Crandall served as Chair of the NARUC Energy Conservation Staff Subcommittee from 1986-1989. He has lectured and made presentations to many groups on demand-side programs and least-cost planning, including two NARUC-sponsored least-cost planning conferences; the 1990 NARUC Regional Workshops on Least-Cost Utility Planning in Newport, Rhode Island and Little Rock, Arkansas; the Wisconsin Public Service Commission's Integrated Resource Planning Workshop; the 1988, 1989, and 1990 Michigan State University Graduate School of Public Utilities and the U.S. Department of Energy.

Mr. Crandall has testified before the: United States Congress, Michigan Legislature, Michigan Public Service Commission, North Carolina Utilities Commission, Public Service Commission of the District of Columbia, Illinois Commerce Commission, Maine Public Utilities Commission, Massachusetts Department of Public Utilities, Public Service Commission of Hawaii, Minnesota Public Service Commission, Iowa Public Service Commission, Georgia Public Service Commission, Public Utility Commission of Ohio, Virginia Public Service Commission, Wisconsin Public Service Commission, and the City Council of the City of New Orleans, Louisiana.

Mr. Crandall has written several articles published in the <u>Public Utilities Fortnightly</u> and <u>Electricity Journal</u>, <u>Natural Gas Magazine</u>, and a number of proceedings for the Biennial Regulatory Information Conference and the American Council for an Energy-Efficient Economy.

TESTIMONY

Case No. U-5531, (8/77), Consumers' Power Company electric rate increase application. Mr. Crandall served as the Staff Witness and recommended that the Applicant initiate the Residential Electric Customers' Information program.

Case No. U-6743, (3/81), Michigan Consolidated Gas Company. Mr. Crandall served as the Staff policy witness and recommended that the Commission approve a surcharge to cover all reasonable and prudent costs associated with Applicant's implementation of the Michigan Residential Conservation Services Program.

Case No. U-6819, (6/81), Michigan Power Company-Gas. Mr. Crandall served as the Staff policy witness and described the basis for the program and the expected level of activity, recommending that the Commission approve a surcharge to cover all reasonable and prudent costs associated with Applicant's implementation of the Michigan Residential Conservation Service Program.

Case No. U-6787, (6/81), Michigan Gas Utilities Company. Served as the Staff policy witness and described the basis for the program and the expected level of activity, recommending that the Commission approve a surcharge to cover all reasonable and prudent costs associated with the implementation of the Michigan Residential Conservation Service Program.

Case No. U-6820, (6/81), Michigan Power Company-Electric. Served as the Staff policy witness and reviewed the Applicant's request to operate the Michigan Residential Conservation Service Program. Although not mandated by federal law, Applicant chose to operate the program in conjunction with its other services offered to residential gas customers. Recommended the establishment of a surcharge to cover all reasonable and prudent costs associated with the operation of that program.

Case No. U-5451-R (10/82), Michigan Consolidated Gas Company. Served as the Staff policy witness and described the Staff's position regarding Applicant's proposed adjustment of surcharge level. Recommended that the eligibility criteria for customers be adjusted to more accurately reflect proper fuel consumption and to include customers who would be likely to realize a seven-year return on their investment by installing flue-modification devices in conjunction with Applicant's financing program.

Case No. U-6743-R, (10/82), Michigan Consolidated Gas Company. Served as the Staff policy witness regarding the Applicant's proposed expenses and revenues, as well as the reasonableness of activity and expense levels in the company's projected period.

Case No. U-7341 (12/84), Detroit Edison Company, Request for Authority for Certain Non-Utility Business Activities. Represented the Staff's position during settlement discussions and sponsored the settlement agreement.

Case No. U-6787-R, (3/84), Michigan Gas Utilities Company. Served as the Staff witness regarding the Applicant's proposed expenses and revenues. This also included a review of the company's future expenses associated with the Energy Assurance Program, the Specialized Unemployed Energy Analyses, and the Michigan Business Energy Efficiency Program expenses.

Case No. U-8528, (3/87), Commission's Own Motion on the Costs, Benefits, Goals and Objectives of Michigan's Utility Conservation Programs. Represented the Staff on the costs and savings of conservation programs and the other benefits of existing programs, and described alternative actions available to the Commission relative to future energy-conservation programs and services and other conservation policy matters.

Case No. U-8871, et al., (4/88), Midland Cogeneration Venture Limited Partnership. For approval of capacity charges contained in a power-purchase agreement with Consumers' Power Company. Served as the Staff witness on Michigan conservation potential and reasonably achievable programs that could be operated by Consumers' Power Company, and testified to the potential impact of these conservation programs on the Company's request for use of its converted nuclear plant cogeneration project. Also recommended levels of demand-side management potential for the commercial, industrial and institutional sectors in Consumers' Power service territory.

Case No. U-9172, (1/89), Consumers' Power Company, Power-Supply Cost-Recovery Plan and Authorization of Monthly Power-Supply Cost-Recovery Factors for 1989. Served as Staff witness on the conservation potential and reasonably achievable programs that could be operated by Consumers' Power Company. Testified to the potential impact of these conservation programs

on the Company's fuel and purchase practices, its five-year forecast and the fuel factor. Recommended levels of demand-side management potential for the commercial, industrial and institutional sectors in Consumers' Power service territory as an offset to its more-expensive outside and internally generated power. Suggested that CPCO vigorously pursue conservation, demand-side management research, and planning and program implementation.

Case No. U-9263, (4/89), Consumers' Power Company Request to Amend its Gas Rate Schedule to Modify its Rule on Central Metering. Served as a Staff witness on the conservation effect of converting from individual metered apartments to a master meter. Suggested that the Commission continue its moratorium on the master meters, due to the adverse energy-conservation and efficiency impact.

Case No. E-100 (1/90) North Carolina Public Service Commission proceeding on review of the Duke Power Company's least-cost utility plan. Testified on behalf of the North Carolina Consumers' Council regarding utility energy-efficiency and demand-side management programs and the concept of profitability and implementation of demand-side management programs.

Case No. 889 (1/90) Public Service Commission of the District of Columbia. Testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates (general rate case). Sponsored testimony regarding the design and implementation and overall appropriateness of PEPCO's existing and proposed energy-efficiency and conservation programs.

Case No. 889 (4/90) Public Service Commission of the District of Columbia. Provided supplemental direct testimony and testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates (general rate case). Offered supplemental testimony regarding a more detailed review of PEPCO's existing pilot and full-scale energy-efficiency and conservation programs. Offered suggestions and recommendations for a future direction for PEPCO to pursue in order to implement more cost-effective and higher-impact energy-efficiency and conservation programs.

Case No. ICC Docket 90-004 and 90-0041 (6/90) Illinois Commerce Commission proceeding to adopt an electric-energy plan for Central Illinois Light Company (CILCO). Testified on behalf of the State of Illinois, Office of Public Counsel and the Small-Business Utility Advocate. Reviewed the CILCO electric least-cost plan filing and the conservation and load-management programs proposed in its filing. Sponsored testimony regarding my analysis of the proposed programs, and offered alternative programs for the Company's and the Commission's consideration.

Case No. D.P.U. 90-55 (6/90) Commonwealth of Massachusetts Department of Public Utilities. Testified on behalf of the Commonwealth of Massachusetts, Division of Energy Resources. Reviewed and analyzed Boston Gas' proposed energy-conservation programs that were submitted for pre-approval in its main rate case. In addition, suggested that it might consider implementation of other natural-gas energy-efficiency programs, and not award an economic incentive for energy-efficiency and conservation programs until minimum program-implementation standards are satisfied.

Case No. U-9346 (6/90) Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency Association. Reviewed and analyzed the Consumers' Power Company rate-case filing related to energy-efficiency and demand-side management programs. Proposed alternative energy-efficiency programs and recommended program budgets and a cost-recovery mechanism.

Case No. 89-193; 89-194; 89-195; and 90-001 (6/90) Maine Public Utilities Commission. Testified on behalf of the Maine Public Advocate's Office. Reviewed the appropriateness of Bangor Hydro-Electric Company's existing energy-efficiency and demand-side management programs in the context of BHE's main rate case and request for approval to construct the Basin Mills Hydro-Electric dam. Reviewed the overall resource plan and suggested alternative programs to strengthen the energy-efficiency and demand-side management resource efforts.

Case No. 6617 (4/91) Hawaii Public Utility Commission. Testified on behalf of the Hawaii Division of Consumer Advocacy. Described what demand-side management resources are, why they should be included in the integrated resource planning process, and proposed the implementation of several pilot projects in Hawaii along with guidelines for the pilot programs.

Case No. E002/GR-91-001 (5/91) Minnesota Public Utilities Commission. Testified on behalf of Minnesotans for an Energy Efficient Economy. Assessed the DSM programs being operated or proposed by Northern States Power Company and made recommendations as to ways in which NSP could improve its DSM efforts.

Case No. 905 (6/91) Public Service Commission of the District of Columbia. Testified on behalf of the District of Columbia Energy Office. Responded to the energy-efficiency and load management aspects of Potomac Electric Company's filing and made several recommendations for DC-PSC action.

Case No. 6690-UR-106 (9/91) Public Service Commission of Wisconsin. Testified on behalf of The Citizens' Utility Board of Wisconsin. Assessed the DSM programs being operated or proposed by the Wisconsin Public Service Corporation, made recommendations as to the WPSCO energy efficiency programs, and suggested ways the company could improve its DSM efforts.

Case No. E002/CN-91-19 (12/91) Minnesota Public Utilities Commission. Testified on behalf of Minnesota Department of Public Service. Assessed the DSM potential and programs being operated or proposed by Northern States Power Company and made recommendations as to the potential for energy efficiency in the NSP service territory and ways in which NSP could improve its DSM efforts.

Case No. 912 (4/92) Public Service Commission of the District of Columbia. Testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates for the sale of electric energy. Testified regarding the reasonableness of DSM and EUM policy changes, the cost allocation of the DSM and EUM expenses, an examination of the prudence of management regarding the energy-efficiency

programs, and an examination of the appropriateness of the costs associated with energy-efficiency programs.

Case No. PUE 910050 (5/92) Virginia State Corporation Commission. Testified on behalf of the Citizens for the Preservation of Craig County regarding the need for the Wyoming-Cloverdale 765 kV transmission line. Specifically, addressed the adequacy of the DSM planning of Appalachian Power Company and Virginia Power/North Carolina Power. Made recommendations as to APCO and VEPCO's energy efficiency programs, and suggested ways the company could improve its DSM efforts.

Case EEP-91-8 (5/92). Iowa Utilities Board. Testified on behalf of the Izaak Walton League concerning the adequacy of Iowa Public Service Company's Energy Efficiency Plan. Reviewed the plan and suggested modifications to it.

Case No. 4131-U and 4134-U (5/92). Georgia Public Service Commission. Testified on behalf of the Georgia Public Service Commission staff regarding the demand-side management portions of Georgia Power Company's and Savannah Electric and Power Company's Integrated Resource Plans. Testimony demonstrated that it is reasonable for the Commission to expect that the utilities can successfully secure substantial amounts of demand-side management resources by working effectively with customers.

Case 917 (8/92). Public Service Commission of the District of Columbia. Testified on behalf of the District of Columbia Energy Office in hearings on Potomac Electric Power Company's Integrated Resource Planning process. Addressed a number of program-specific issues related to PEPCO's demand-side management efforts.

Case No. 4132-U, 4133-U, 4135-U, 4136-U (10/92). Georgia Public Service Commission. Testified on behalf of the Staff Adversary IRP Team of the Georgia PSC. Provided a critique of Georgia Power Company's and Savannah Electric and Power Company's proposed residential and small commercial DSM programs.

Case No. 4135-U (3/93). Georgia Public Service Commission. Testified on behalf of the Staff Adversary IRP Team of the Georgia PSC. Provided a critique of Savannah Electric and Power Company's proposed Commercial and Industrial DSM programs.

Case No. R-0000-93-052 (12/93). Arizona Corporation Commission. Testified on behalf of the Arizona Community Action Association. Critiqued and made recommendations regarding the integrated resource plans and demand-side management programs of Arizona Public Service Company and Tucson Electric Power Company.

Case No. 934 (4/94). Public Service Commission of the District of Columbia. Filed testimony on behalf of the District of Columbia Energy Office in hearings concerning the Washington Gas Light Company (WGL) general rate case application to increase existing rates and charges for gas service. Testimony involved critiquing and reviewing WGL's least cost planning efforts and integration of DSM, marketing and gas supply efforts.

Case No. U-10640 (10/94). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency Association concerning the need to integrate DSM and load promotion analysis into MichCon's GCR planning process.

Case No. 05-EP-7 (3/95). Wisconsin Public Service Commission. Testified on behalf of the Citizens' Utility Board on level of utility DSM and program designs and strategies.

Case No. 05-EP-7 (3/95). Wisconsin Public Service Commission. Testified on behalf of the Wisconsin Community Action Program Association on low-income customers and utility DSM programs.

Case No. TVA 2020-IRP (9/95). Tennessee Valley Authority. Testified on behalf of the Tennessee Valley Energy Reform Coalition. Assessed, critiqued and made recommendations regarding the integrated resource plans and demand-side management programs proposed by the Tennessee Valley Authority.

Case No. R-96-1 (10/95). Alaska Public Utilities Commission. Testified on behalf of the Alaska Weatherization Directors Association regarding the proposed standards and guidelines for integrated resource planning and energy efficiency initiatives under consideration in Alaska.

Case No. D95.9.128 (2/96). Montana Public Service Commission. Testified on behalf of the District XI Human Resources Council concerning the low-income energy efficiency programs offered by the Montana Power Company.

Case No. DPSC Docket No. 95-172 (5/96). Delaware Public Service Commission. Prepared draft testimony on behalf of the Low-Income Energy Consumer Interest Group regarding Delmarva Power & Light Company's application to revise its demand-side programs. The case was settled, with LIECIG obtaining funding for low-income energy efficiency programs, prior to testimony.

Case No. U-11076 (8/96). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Jobs Commission's recommendations regarding electric and gas reform. Discussed the implications of utility restructuring and the needs of residential and low-income households, and proposed regulatory and industry solutions.

Case No. 96-E-0897 (3/97). New York Public Service Commission. Prepared draft testimony for New York's Association for Energy Affordability regarding the impact of proposed utility restructuring plans on low-income customers. The case was settled in Spring 1997.

Case No. R-00973954 (7/97). Pennsylvania Public Utilities Commission. Testified on behalf of the Commission on Economic Opportunity regarding the economics of demand-side measures and programs proposed for implementation by Pennsylvania Power & Light Company.

Case No. 98-07-037 (7/98) California Public Utilities Commission. Testified on the California Alternative Rates for Energy and the Low Income Energy Efficiency programs regarding the

implementation and adoption of revisions to these programs necessitated by the AB 1890 and the Low Income Governing Board.

Case No. U-12613 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Public Service Corporation application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12649 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Electric Power Company and the Edison Sault Electric Company application to implement PA 141 Michigan's electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12651 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Northern States Power Company — Wisconsin application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12652 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Indiana Michigan Power Company d/b/a American Electric Power application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12725 (4/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Electric Power Company and the Edison Sault Electric Company application to increase its residential rates. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management and recommended a significant increase in these activities.

Case No. U-13060 (12/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application for Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed GCR factor and suggested continuation of the existing GCR factor or adopt an adjusted MCAAA sponsored GCR factor. I also suggested a set-aside allocation be designated for low-income customers to ensure access to alternative gas providers under the applicant's customer choice program.

Case No. 6690-UR-114 (9/02). Wisconsin Public Service Commission. Testified on behalf of the Citizens Utility Board regarding the Wisconsin Public Service Corporation application to increase its electric and natural gas rates. I reviewed the portions of the filing related to their low-income assistance/weatherization and the proposed executive compensation incentive plan.

Case No. U-14401 (04/05). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application for Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed plan and suggested initiation of strategies that would lower the need to acquire expensive and unnecessary gas supplies.

Case No. U-14401-R (10/05). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application re-opener Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed plan and suggested initiation of strategies that would lower the need to acquire expensive and unnecessary gas supplies.

Case No. U-14701 (02/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding the Consumers Energy Company application for Approval of a Power Supply Cost Recovery Plan and for Authorization of Monthly Power Supply Cost Recovery Factors for Calendar Year 2006. I reviewed the filing including the application, testimony, exhibits, discovery responses and submitted testimony recommending that the Commission not approve the five-year PSCR plan as filed due to the impacts related to the Palisades sale and the absence of alternative resources in the projected five-year resource portfolio.

Case No. U-14702 (02/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Detroit Edison Company application for authority to implement a Power Supply Cost Recovery Plan in its rate schedules for 2006 metered jurisdictional sales of electricity. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the proposed five-year PSCR plan as filed due because it was deficient in its selection of alternative resources in the projected five-year resource portfolio.

Case No. U-14992 (12/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Consumers Energy Company application for approval of the proposed Power Purchase Agreement in connection with the sale of the Palisades Nuclear Power Plant and other assets. The purpose of my testimony was to address the overall soundness of this application and proposal. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the proposed purchase power agreement and transfer the ownership of the nuclear plant and other assets.

Case No. 06-0800 Illinois Commerce Commission (3/07). Provided testimony on behalf of the Illinois Citizens Utility Board regarding the Illinois electricity resource auction process. I assessed the existing resource/power supply auction based bidding process and recommended modifications and improvements to the Illinois resource acquisition mechanism.

Case No. 24505-U (5/07). Georgia Public Service Commission. Testified on behalf of the Georgia Public Service Commission Advocacy staff regarding the demand-side management portions of Georgia Power Company's Integrated Resource Plans. Testimony demonstrated that it is reasonable for the Commission to approve the five proposed DSM programs and expect that Georgia Power can successfully secure considerably more demand-side management resources by working effectively with its customers.

Case No. U-14992 (11/07) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Consumers Energy Company rate application for approval a rate increase and the recovery of energy efficiency programs and certain costs in connection with the sale of the Palisades Nuclear Power Plant and other assets. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the recovery of transaction costs involving the transfer the ownership of the nuclear plant and other assets and on various aspects of its proposed energy efficiency programs and proposed incentives.

Case No. 07-0540 (12/07) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Commonwealth Edison Company application for approval of its proposed Energy Efficiency and Demand Response Plan. I assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. 07-0539 (12/07) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Central Illinois Light Company d/b/a and Ameren CIPS CENTRAL ILLINOIS PUBLIC SERVICE COMPANY and Ameren CIPS ILLINOIS POWER COMPANY d/b/a Ameren IP application for approval of its proposed Energy Efficiency and Demand Response Plan. I assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. U-15415 (2/08) Michigan Public Service Commission. Testified on behalf of the American Association of Retired People regarding The Consumers Power Company application for approval for authority to implement a Purchase Power recovery plan, 5-year forecast, and monthly PSCR factors for the 12-month period calendar year 2008. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission adopt a more effective and less expensive resource acquisition procedure to help keep the cost of energy down in Michigan.

Case No. U-15417 (4/08) Michigan Public Service Commission. Provided testimony on behalf of the American Association of Retired People regarding The Detroit Edison Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedule for 2008 Metered Jurisdictional Sales of Electricity. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission adopt a more effective and less expensive resource acquisition procedure to help keep the cost of energy down in Michigan.

Case No. U-15244 (7/08) Michigan Public Service Commission. Provided testimony on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Detroit Edison Company request for Authority to increase rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission direct DECO to make modifications to its Integrate Resource Planning analysis.

Case No. EEP-08-2 (7-08) Iowa Public Utilities Board. Provided testimony on behalf of the environmental interveners regarding the request of the Mid American Energy Company for approval of an Energy Efficiency Plan. I made an assessment of the proposed energy efficiency and demand response plan and recommended modifications and improvements to the implementation strategy and proposed programs.

Case No. EEP-08-1 (8-08) Iowa Public Utilities Board. Provided testimony on behalf of the environmental interveners regarding the Interstate Power and Light Company request for approval of an Energy Efficiency Plan. I made an assessment of the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed programs and implementation strategy.

Case No. 137-CE-147 (2-09) Public Service Commission of Wisconsin. Provided testimony on behalf of PRESERVE OUR RURAL LANDS regarding the Application of American Transmission Company, as an Electric Public Utility, to Construct a new 345 kV Line from the Rockdale Substation to the West Middleton Substation, Dane County, Wisconsin. I suggested modifications of the proposal and rejection of the approval of the line.

Case No. M2009-2093218 (8-09) Pennsylvania Public Utility Commission. Provided testimony on behalf of The Office Of Consumer Advocate regarding the West Penn Power Company d/b/a Allegheny Power Energy Efficiency and Conservation Plan request for plan approval. I analyzed the proposed plan and made an assessment of the proposed energy efficiency and demand response and cost recovery plan. I suggested modifications and improvements to the proposed programs as well as the proposed implementation strategy.

In addition, I have served the following public sector clients since 1990.

Client	Nature of Service
Alaska Housing Finance Corporation	Analysis of energy efficiency, system planning and applicability of EPAct standards to Alaska resource selection process.
California Low Income	In conjunction with AB 1890 the state's restructuring statute

Governing Board	provided analyses of options to deliver energy efficiency and assistance programs to low-income households in a restructured utility environment. Assisted the CPUC and Low Income Governing Board in developing low-income energy assistance and energy efficiency programs, implementation methods and procedures under interim utility administration.
Conservation Law Foundation of New England	Provided technical support to the collaborative working groups with Boston Edison, United Illuminating, Eastern Utilities Association, and Nantucket Electric regarding system planning approaches, energy efficiency programs and resource screening.
District of Columbia Energy Office	Analysis of DC Natural Gas' and PEPCo's integrated resource planning and demand side management programs.
District of Columbia Public Service Commission	Testimony regarding demand-side management, least cost planning principles.
Germantown Settlement, Philadelphia	Analysis and technical support regarding business structure and market to aggregate load and/or provide energy efficiency and energy assistance services to low-income households.
Hawaii Division of Consumer Advocacy	Developed demand-side management programs and integrated resource planning rules.
Iowa Department of Natural Resources	Developed and implemented workshops to train building operators and architects in energy efficiency and renewable energy resource opportunities.
Public Interest Research Group In Michigan	Principal investigator and project manager for the "Lessons Learned: Michigan Electricity Restructuring Report"
Maryland Public Service Commission	Reviewed demand-side management programs and impact and process evaluation methods and suggested improvements.

Analysis of Boston Gas Co. integrated resource plans and Massachusetts Division of residential energy efficiency programs. Analysis of Boston **Energy Resources** Gas's commercial and industrial energy efficiency programs Developed least cost planning rules, guided a public working City of New Orleans group to develop demand-side programs, and developed a low income, senior citizens energy efficiency program. Prepared an economic analysis of the customer impact from Oak Ridge National various electricity restructuring configurations for the State of Laboratory Ohio Analyzed two utilities' long-range plans and energy efficiency Ohio Office of Consumer resource options. Analyzed the Dominion East Gas Company Council application to be relieved of the merchant function. Developed demand-side management programs and evaluated Ontario Energy Board need for natural gas integrated resource planning rules. Evaluated demand-side management programs for several Pennsylvania Office of Consumer Advocate electric utilities. Provided technical training, technical and achievable energy Upper Peninsula Power efficiency potential analysis and developed a specific and Company geographically tailored low income, senior citizens energy efficiency program. Developed handbook, "Energy Efficiency and Renewable U.S. Environmental Energy: Opportunities from Title IV of the Clean Air Act", Protection Agency which focuses on how energy efficiency and renewables relate to acid rain compliance strategies. Analyzed and compared utility supply- and demand-side U.S. Environmental resource selection for Clean Air Act compliance on the Protection Agency and U.S. Pennsylvania-New Jersey-Maryland (PJM) interconnection. Department of Energy Analysis of the PacifiCorp proposed Demand-Side Utah Department of Management Tariff Schedule. Commerce

Vermont Public Service Board	Analysis of the prudence of Green Mountain Power's planning and management of the Hydro-Quebec power purchase.
Washington State Weatherization Directors	Natural Gas energy conservation program design involving Cascade Natural Gas Company

Page 1 of 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

September 3, 2009

Dear ENERGY STAR® TV Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) is pleased to provide you with the final ENERGY STAR Version 4.0 and 5.0 Television (TV) specifications. This letter lays out the Agency's final decisions regarding these new requirements and outlines the general process for qualifying products using these new requirements

Versions 4.0 and 5.0 requirements will become effective on May 1, 2010 and May 1, 2012 respectively. TVs qualifying for ENERGY STAR under the Version 4.0 specification will offer consumers a savings of more than 40 percent. When the Version 5.0 specification goes into effect, ENERGY STAR qualified TVs will be as much as 65 percent more efficient than models currently on the market. These requirements establish challenging On Mode power consumption levels, take steps to ensure a TV is viewed in the mode in which it qualified for ENERGY STAR so consumer savings are realized, and curb power associated with downloading program guide data.

These specifications were developed through a process that included release of three draft specifications, along with supporting documents such as proposals specific to DAM, luminance, and hospitality TVs, six stakeholder meetings, and input from stakeholders. The enclosed Comment Response document contains a summary of comments received in response to the draft final specification and an explanation of EPA's response in each case. Stakeholder comments, previous drafts of the specification, and related materials are available on EPA's ENERGY STAR Web site at www.energystar.gov/RevisedSpecs. Click on the "Televisions" link.

The Versions 4.0 and 5.0 On Mode requirements remain unchanged from the proposed levels in the final draft specification. EPA received little additional input on the proposed 4.0 requirements. After weighing carefully all input specific to the proposed 5.0 requirement, EPA has decided to proceed with a requirement that TVs greater than 50 inches in size meet the same On Mode requirements as a screen of 50 inches — 108 watts.

EPA's decision is largely due to an issue that is present in several ENERGY STAR program areas and needs to be addressed to maintain the integrity of the ENERGY STAR label and program. The issue in this case is what TV sizes can the federal government credibly designate as preferable from an energy and environmental perspective. This has become an important issue as the sizes of TVs and energy use continue to grow. To address this issue, EPA considered limiting the TV-size eligible for the ENERGY STAR label to 50 inch TVs or smaller. The proposed energy consumption level for TVs larger than 50 inches arose out of the recognition that if these larger TVs could meet limits associated with a 50 inch TV, excluding them would be unwarranted.

Consistent with this rationale, EPA accepts the potential that there may be more limited selection of ENERGY STAR products in the largest of screen sizes under Version 5.0. Further, EPA knows that there will be some availability of products with these screen sizes; there is already qualifying product in TV sizes greater than 50 inches, and we expect that the number of products that will meet the 5.0 requirements will only grow between now and 2012.

EPA is committed to tracking this market carefully and revisiting the Version 5.0 requirements before they go into effect if the selection of qualifying models raises questions regarding the impact of the label. As appropriate, EPA will reconsider manufacturers' proposals or any new input at that time.

(GCC-2)	
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Page 2 of 2

Key changes to the Versions 4.0 and 5.0 specifications since the final draft are summarized below:

- Luminance Testing: Based on input from stakeholders, EPA is accepting industry's proposal for measuring luminance to provide greater clarity and precision. The final test procedure includes use of the three bar video signal provided in IEC 62087 Ed. 2, Section 11.5.5. The test method includes additional guidance on conducting the measurements immediately following On Mode power testing and includes a 10-minute stabilization period before each luminance measurement (e.g., home and retail).
- Download Acquisition Mode (DAM): Based on input EPA has received from TV manufacturers and content providers, EPA has removed the language in the Final specification that DAM must be disabled upon shipping and can only be enabled by a user activating the feature. EPA will continue to require that any TV with DAM must meet the energy requirement when in DAM, regardless of whether the feature is enabled upon shipping. All other aspects DAM requirements remain unchanged from those in the draft final specifications. EPA will continue to track the DAM trends closely.
 - DAM Testing: To allow additional time for creating a test procedure for measuring DAM, EPA will facilitate development of the test procedure through the coming few months. This effort will continue building on the concepts and requirements discussed on the July 30 stakeholder conference call and outlined in previous drafts of the specification. EPA will seek comment on a next draft of the DAM test method with set-up requirements and a test stream after receipt of additional information from interested stakeholders, ideally in late September. Once final, EPA will amend the Version 4.0 and 5.0 specifications to include this refined testing language.
- CEA-2037: EPA has incorporated draft CEA-2037 in the specification to provide additional clarification on using IEC 62087, Ed. 2.0, Section 11 for measuring TV On Mode power, pending its finalization. EPA believes that doing so helps to further domestic harmonization of TV testing (i.e., by regulators and voluntary programs). EPA recognizes that CEA-2037 became available later in the specification development process, and thus ENERGY STAR stakeholders had more limited ability to comment on this testing standard. Therefore, EPA will share comments the Agency receives on this standard with CEA and request that they be considered. EPA will make every effort to keep stakeholders informed of changes to this document as it moves to finalization.

In the coming months, EPA will provide stakeholders with instructions that explain how to become, or continue, as an ENERGY STAR Television partner as the new specifications go into effect. Once the Version 4.0 specification is in effect on May 1, 2010, the process to qualify televisions will be generally consistent with what was in place for Version 3.0, with an active manufacturer partnership being required and data collected through the Online Product Submittal (OPS) tool at www.energystar.gov/ops. In early 2010, EPA will work to revise the OPS system to accept data for the product categories in the specification.

EPA thanks stakeholders who provided feedback during the specification revision process and looks forward to working with you as you qualify and market your energy-efficient televisions. If you have any questions or concerns about the specification or partnership process, please feel free to contact me at (202) 343-9120 or kaplan.katharine@epa.gov.

Thank you for your continued support of ENERGY STAR.

Best Regards.

Katharine Kaplan, U.S. EPA

ENERGY STAR for Consumer Electronics

(GCC-3)	

Page 1 of 1

For immediate Release: November 18, 2009 Media Contact: Adam Gottlieb - 916-654-4989

California Approves New Energy Efficient TV Regulations

First in the Nation Standard Will Save Consumers \$8.1 Billion Over 10 Years

Sacramento — In an historic and unanimous 5-0 vote, the California Energy Commission today approved the nation's first energy efficiency standards for televisions. When these standards are implemented in 2011, new TVs sold in California will be the most energy efficient in the nation. After ten years, the commission estimates the regulations will save \$8.1 billion in energy costs and save enough energy to power 864,000 single-family homes.

"The real winners of these new TV energy efficiencies are California consumers who will be saving billions of dollars and conserving energy while preserving their choice to buy any size or type of TV. Californians buy four million televisions each year and they deserve the most energy efficient models available," said Energy Commission Chairman Karen Douglas.

The technology neutral standards mandate that new televisions sold in California should consume 33 percent less electricity by 2011 and 49 percent less electricity by 2013. The standards affect only those TVs with a screen size 58 inches or smaller. For example, a 42-inch screen would consume 183 watts or less by 2011 and 115 watts or less by 2013. Pacific Gas & Electric estimates that over a decade the standards will reduce CO2 emissions by three million metric tons.

More than 1,000 TV models on the market today already meet the 2011 standards and cost no more than lessefficient sets. The regulations will not affect existing televisions that consumers already own or the TVs currently on retail store shelves. Stores will not be prohibited from selling existing stock of older televisions after the standards go into effect

The Energy Commission began working on TV energy efficiency standards in January 2007. Since then, the Commission's staff collaborated with a variety of stakeholders including major statewide utility companies, the environmental community, TV industry groups and retailers, and consumer groups in an open public process to develop these regulations. Supporters include: Pacific Gas & Electric, San Diego Gas & Electric, Southern California Edison, Sacramento Municipal Utility District, the Natural Resources Defense Council, Union of Concerned Scientists, Environment California, California League of Conservation Voters, Sierra Club of California, Environmental Defense Fund, Center for Energy Efficiency and Renewable Technologies, Vizio, 3M, Agoura Technologies, and the LCD TV Association.

California's per capita electricity use has remained flat for the past 30 years compared to the rest of the nation which has increased its energy consumption by 40 percent. Recently named the nation's most energy efficient state by the American Council for an Energy-Efficient Economy (ACEEE), California has a distinguished 30-year track record of protecting consumers through cost-effective energy efficiency standards and has saved California households and businesses \$56 billion during that time.

Created by the Legislature in 1974, the California Energy Commission is the state's primary energy policy and planning agency. The Energy Commission has five major responsibilities: forecasting future energy needs and keeping historical energy data; licensing thermal power plants 50 megawatts or larger; promoting energy efficiency through appliance and building standards; developing energy technologies and supporting renewable energy; and planning for and directing state response to energy emergency. Members of the Energy Commission are Chairman Karen Douglas; Vice Chair James D. Boyd; and Commissioners Jeffrey Byron; Julia Levin, Dr. Arthur H. Rosenfeld.

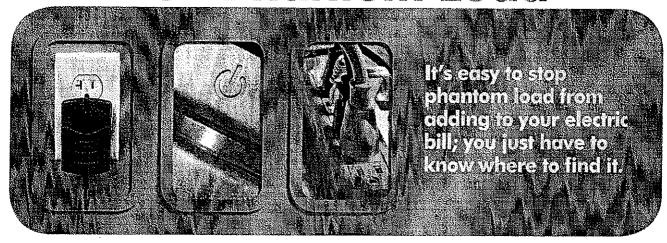
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Accessibility | Contact Us

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Last Modified: 11/18/09

Pull the Plug on Phanton Load



When plugged in, appliances and chargers use electricity whether they're on or not. This wasted power is called phantom load. Phantom load costs American consumers more than \$3 billion a year and adds up to the output of several power plants.

More than 50 percent of the electricity used to power most electronics is used while they're off. This accounts for 4 to 7 percent of every home's electricity usage.

Save some green by turning off and unplugging what you can, possibly reducing your home's phantom load by as much as one third. If we all work to eliminate unnecessary phantom load, we can save more of Earth's natural resources and reduce greenhouse gas emissions.

If an appliance isn't used regularly, unplug it. For the tangle of cords and power converters behind your stereo system and computer, get a power strip. By turning off the power strip, you'll power off all components at once.

Items most likely to have phantom load are those that:

Use remote controls – Stereos, VCRs, DVD players, window air conditioners and TVs fall into this category.

Have digital displays or clocks – A clock on some appliances makes sense; a clock on others doesn't. Plugging these types of appliances into on/off switches makes better sense. And if you haven't used your VCR in a while, unplug it.

Require external power supply – Look for appliances using power cords with boxes and lights, like laptop computers, printers, video game units and modems. These power supplies usually stay on after the appliance is off.

Use battery chargers – Some rechargers stay on regardless of whether they've finished or not. Unplug your cell phone, MP3 player, laptop computer, power tools and other small rechargeable appliances when not in use.







Look for ENERGY STAR[®] qualified products and others with no or low standby power consumption when replacing or buying new appliances:

High-Eneroy Television



If you've noticed your electricity usage is a little higher than usual lately, there's a good chance you've purchased a new high definition television.

Most LCD and plasma televisions use energy wisely; however, these sets, reaching 42", 50", 65" up to 103" in size, are giants compared to tube TVs, and it takes more energy to light up their screens. In fact, some large HDTVs consume more electricity than a standard kitchen refrigerator.

To get more energy efficiency from your HDTV:

Buy an ENERGY STAR* qualified television, which uses about 30 percent less energy than other sets. The EPA now has tougher ENERGY STAR 3.0 specifications for televisions, forcing them to have "home" (less bright) and "retail" (bright demo) settings to make it easier to reduce power consumption. ENERGY STAR compliant 32" HDTVs now must operate on less than 121 watts, and 50" models less than 391 watts.

Lower the brightness and contrast levels of your plasma or LCD television, which will lower the amount of energy it uses.

Similarly, most LCD TV sets have adjustable backlights that consume less power when turned down. Many newer LCD models offer backlights that automatically adjust to use less power projecting darker shots.

If you're not actively watching the television, turn it off. And if you have a tendency to fall asleep with the TV on, set the TV's timer function to turn off the set whenever you request.

Watching TV at high volumes takes more energy, so turn it down and save. And if you run the audio through a separate amplifier, use it only for DVDs and programs that showcase the technology.

Turn off television accessories, such as VCRs, DVD players and amplifiers, after using them.

Cut the room light to make your screen look brighter and reduce light bulb use.

If you're choosing a new TV based solely on energy consumption, there are two rules of thumb: first, the smaller the HDTV the less energy it will use; and second, LCD televisions generally are more energy efficient than plasma televisions.

Following these suggestions could help reduce your HDTV's energy consumption. Visit www.midamericanenergy.com for more energy-saving tips.





888-427-5662 MIDAMERICANENERGY.com

Best viewed and printed on legal size paper

ENERGY STAR Qualified Residential LED Lighting

Last Modified: 02/12/2010

The product specifications listed below are based on tested values according to the ENERGY STAR Solid-State Lighting Luminaire Program Requirements. Values displayed on product packaging and marketing materials may differ.

Must be used with one of the followin frims to maintain ENERGY STAR qualification: 494WB06, 494H06, 494SC06, 494P06 L460WH, TL401WB, TL402SCS, L402WH, TL401WB, TL402SCS, L402HS, TL402WIIS, TL403WBS trins to maintain ENERGY STAR qualification: 494WB06, 494H06, Must be used vail one printer GH tring prauman ENERGY STAR qualification, 403HS06, 403SCS6 493FMES06 Must be used with one of the foll Notes De-listed Date Qualified 6002391/6 10/16/2009 9/16/2005 9/16/2009 9/16/2009 9/16/2009 9/16/2009 0802/8/ 2/25/2009 2/3/2009 Temperature Date 9/3/2009 (Relvin) Color 2700 3000 2700 2700 3000 3500 ğ ** Factor Lifetime Power 9672 .9672 68.0 0.87 260 (hours) 7 Rated 35000 25000 35000 35000 25000 35000 35000 28082 3000 25000 25000 (lumens/Watt) | Wattage | (lumens) Light Output 283.5 140 362 633 233 633 39 209 10.33 Luminaire Efficacy ile 1533 37.0 45.8 45.8 wall-mounted poteh lights wath-mounted porch lights Celing-received Celling-diounted? Ourdoor pathway wail-mounted porch lights Outdoor wall-mounted posch lights wall-mounted porch lights Product Recessed downlights Recessed downlights oorch lights 4101 ML786530-4 93 Model ML706830 ML706835 EL405830 EL405835 284339 11451 25867 8496 98 PORTFOLID PORTFOLIO PORTFOLIO PORTFOLID PORTFOLIO PORTFOLIO PORTFOLIO PORTFOLIO PORTFOLIO PORTFOLIO Brand HALO HALO HALO HALO HALO A Arrichturg, Trans Des Lighting Sel Air Lighling, Trans Flobe Lighting Sel Air Lighting, Trans Flobe Lighting d Air Lighting, Trans tobe Lighting d Air Lighting, Trans obertighting Manufacturer Bel Air Lighting, Trans Globe Lighting el Air Lighting, Trans lobe Lighting 3el Air Lighting, Trans Globe Lighting 3d Afritsking, Trans 3labe Lighling oper Lighting oper Lighting ooper Lighting oper Lighting oper Lughting Name

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DTE Energy's Your Energy Savings™ Program

2010 Program Application

Follow This Easy Process:

Eligibility

1 Qualified measures installed at facilities served by DTE Energy. Equipment must meet the specifications as explained in the application. Additional details are available in the Policy and Procedures Manual.

Incentive Reservations (Reservation Applications)

- 2 Email, mail or fax a signed and completed copy of the application. Reservation Applications are strongly encouraged for all projects and are required for custom projects.
- 3 Installation Install eligible project and collect all required documentation for submittal.

Project Completion (Final Applications)

4 Email, mail or fax a signed and completed copy of the completed application and all required documentation including dated, itemized invoices and manufacturer specifications.

Send completed applications to:

Email

YourEnergySavings@kema.com

Mail

DTE Energy's Your Energy Savings Program P.O. Box 11289 Detroit, MI 48211

Fax

877.607.0744

If you need assistance, please contact our program hotline 866.796.0512

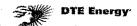
Please visit our website

www.YourEnergySavings.com

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Your Energy Savings Program



LIGHTING SPECIFICATIONS

All lighting projects are expected to comply with the Illuminating Engineering Society of North America (IESNA) recommended lighting levels or the local code, All final applications must include manufacturers' specification sheets for lamps and ballasts. All incentives are for one-for-one replacements except as noted,

Compact Fluorescent Lamps, Screw-in (≤ 31 Watts)

Incentives are available for the replacement of incandescent lamps with CFLs that are ENERGY STAR® rated or that meet ENERGY STAR® criteria. The lamps must have a luminous efficacy of ≥ 50 lumens per watt (LPW), incentive is per lamp. Note: This incentive is not available for CFLs purchased at retail stores participating in the DTE Energy CFL discount program. Incentives for CFLs purchased from those retailers is included in the discounted price.

Compact Fluorescent Lamps, Screw-In (> 31 Watts)

Incentives are available for the replacement of incandescent lamps with high wattage CFLs. The new lamp must have a luminous efficacy of ≥ 65 lumens per watt (LPW). Incentive is per lamp. Note: This incentive is not available for CFLs purchased at retail stores participating in the DTE Energy CFL discount program. Incentives for CFLs purchased from those retailers is included in the discounted price.

Compact Fluorescent Fixtures

Incentives are available for upgrades to interior hardwired compact fluorescent fixtures. Replacement fixtures must be new fixtures or modular hardwired retrofits with hardwired electronic ballasts. The compact fluorescent ballast must be programmed start or programmed rapid start with a power factor $(PF) \ge 0.90$ and a total harmonic distortion $(THD) \le 20\%$. Incentive is per fixture.

Compact Fluorescent Reflector Flood Lamps

Incentives are available to install CFL reflector flood lamps to replace incandescent reflector flood lamps. The CFL reflector flood lamps must have a luminous efficacy of ≥ 33 lumens per watt (LPW). Incentive is per lamp. Note: This incentive is not available for CFL's purchased at retail stores participating in the DTE Energy CFL discount program. Incentives for CFLs purchased from those retailers is included in the discounted price.

42W 8-Lamp Compact Fluorescent High Bay Fixture

Incentives are available in high-bay applications (ceiling heights over 15 feet) for replacing any lighting fixtures greater than or equal to 350W with 42 Watt, 8 lamp compact fluorescent fixtures. Replacement fixtures must contain specular reflectors and electronic ballasts with a power factor (PF) ≥ 0.90. Incentive is per fixture.

ENERGY STAR® Qualified LED Recessed Down Light

Incentives are available to replace incandescent recessed lights with ENERGY STAR® qualified LED recessed down lights. Replacement lights must have a minimum efficacy of 35 lumens per watt. Incentive is per lamp. Note: This incentive is not available for lamps purchased at retail stores participating in the DTE Energy lamp discount program. Incentive for lamps purchased from those retailers is included in the discounted price.

Standard Linear Fluorescent Retrofit

Incentives are available for replacing existing T12 lamps and magnetic ballasts with T8 or T5 lamps and electronic ballasts. The new fixture lamps must have a color rendering index (CRI) \geq 80. The electronic ballast must be high frequency (\geq 20 kHz), UL listed, and warranted against defects for a minimum of 5 years. Ballasts must have a power factor (PF) \geq 0.90. Ballasts for 4-foot lamps must have total harmonic discharge (THD) \leq 20 % at full power output. For 2 and 3-foot lamps, ballasts must have THD \leq 32 % at full light output. Incentive is per fixture.

High Output T8/T5 Lamp and Ballast replacing T12 Fluorescent Lamp

Incentives are available for replacing existing T12 lamps and magnetic ballasts with T5HO or T8HO lamps and electronic ballasts. The replacement lamps must have a CRI ≥ 80, Incentive is per fixture.

Low Wattage 4-foot T8 Lamps (Lamps Only)

Incentives are available for replacing 32 Watt T8 lamps with reduced (low) wattage T8 lamps when an electronic ballast is already present. The lamps must be reduced wattage in accordance with the Consortium for Energy Efficiency® (CEE®) specifications (www.cee1.org) and as summarized in Table 2 below. Low wattage lamps must be either 25W or 28W and CEE® Listed. Qualified products can be found at http://www.cee1.org/com/com-tb/com-tt-main.php3. Incentive is per lamp.

High Performance 4-foot T8 Lamp and Ballast

Incentives are available for replacing existing T12 or T12HO lamps and magnetic ballasts or standard T8 lamps and electronic ballasts with high performance T8 lamps and electronic ballasts. Replacement fixtures must high performance in accordance with the Consortium for Energy Efficiency® (CEE®) high performance T8 specification, available at www.cee1.org, which and is summarized in Table 1 below. A list of qualified lamps and ballasts can be found at: http://www.cee1.org/com/com-tt/com-ft-main.php3. Both the lamp and ballast must meet the specification in order to be eligible for an incentive. Incentive is per fixture.

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Your Energy Savings Program



LIGHTING INCENTIVES WORKSHEET

Note: If your lighting project is not included as one of the measures below, you may submit it as a custom measure.

Equipment Type	Incentive	Unit	# of Units Calculated
Interior High-Intensity Discharge (HID) to Fluorescent Fixtu	re s	130	
3.Lamp T6.HO, replacing 250W HID	\$35.00	Fixture	
4 Lamp T5 HO, replacing 400W HID	\$70.00	Fixture	
6 Lamp T5 HO; replacing 400W HID	\$30.00	Fixture	
Two 6 Lamp T5 HO; replacing 1000W HID	\$120.00	Fixture	
≥ 34. Lamp 32WT8, replacing 250W HID	\$50,00	Fixture	
4. Lamp 32WT8, replacing 250W HID	\$75.00	Fixture	
8 Lamp 32W T8, replacing 400W HID	\$50.00	Fixture	
TWO 8 lamp 32W T8, replacing 1000W HID)	\$160.00	Fixlure	
Pulse Star Metal Halide (retrofit only)	\$30.00	Fixture	
Exterior High-Intensity Discharge (HID) Conversion			is,
7 LED or Induction replacing ≤175W HID	\$45.00	Fixture	
LED of induction replacing 176W to 250W HID	\$65.00	Fixture	
LED of induction replacing: 251W to 400W HID	\$120.00	Fixture	
Garage High-Intensity Discharge (HID) Conversion			
LED or induction replacing \$175WHID	\$100.00	Fixture	
LED or induction replacing 176W to 250W HID	\$150.00	Fixture	
LED or Induction replacing 251W to 400W HID	语 \$180.00	Fixture;	
Exit Sign Conversion		***	
3 LED Exit Signs Electronic Fixtures Retrofit or Replacement	\$12.50	Fixture	
Traffic Signal Conversion			
4 LED Auto Traffic Signals	\$20.00	Signal	
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ComEd's Smart Ideas for Your Business™

FACT SHEET



An Exelon Company

LEDILIGHTING

LED (Light Emitting Diode) lighting is rapidly changing. Everything you previously knew about LEDs is probably outdated. The great potential of LEDs' efficiency and long life has caused manufacturers to devote considerable resources to enhance manufacturing processes and quality and applications continue to appear in the marketplace.

HOW ARE LEDS DIFFERENT FROM INCANDESCENTS OR FLUORESCENTS?

LED lighting has the potential to be more efficient, durable, versatile and longer lasting than incandescent and fluorescent lighting. LEDs emit light in a specific direction, whereas an incandescent or fluorescent bulb emits light — and heat — in all directions. LED lighting uses both light and energy more efficiently.

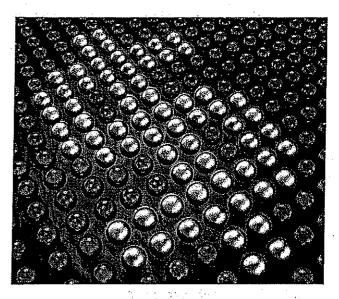
An incandescent light bulb produces light by passing electricity through a metal filament until it becomes so hot that it glows. In a CFL (Compact Fluorescent Light), an electric current is driven through a tube containing gases, producing ultraviolet light that is transformed into visible light by the fluorescent coating (phosphor) on the inside of the tube.

LEDs are made of very thin layers of semiconductor material. One layer will have an excess of electrons, while the next will have a deficit of electrons. This difference causes electrons to move from one layer to another, which generates light. The more electrons that pass across the boundary between layers, known as a junction, the brighter the light. Impurities within the semiconductor, which are introduced during the manufacturing process, are used to create the required electron density. Different semiconductor materials and different impurities result in different colors of light emitted by the LED.

One or more LED chips (about one square millimeter each) are mounted on a heat-conducting material called a heat sink and enclosed in a lens. The resulting device, typically around 7 to 9 millimeters per side, can be used separately or in arrays. A small amount of heat is released into the heat sink, but a well-designed LED is cool to the touch.

LEDs have several advantages over conventional light sources:

- Directional light emission: Because LEDs are mounted on a flat surface, they emit light hemispherically, rather than spherically, reducing wasted light and enabling light to be "aimed."
- Near-monochromatic light: An individual LED chip emits light in a specific wavelength (color), which makes them efficient for colored light applications.
- Size: LED lights can be very compact and low profile an advantage where space is at a premium.
- Breakage resistance: LEDs use no breakable glass or filaments, so they are resistant to vibration and well suited to locations where breakage is an issue.
- Cold temperature operation: LED performance actually increases as operating temperatures drop.



- Rapid cycling capability: Traditional light sources will burn out sooner if switched on and off frequently, but LED life and lumen maintenance is unaffected by rapid cycling.
- Controllability: Some LEDs are compatible with electronic controls to change light levels and color characteristics.
- No infrared (IR) or ultraviolet (UV) emissions: Unlike other forms of lighting, LEDs intended for lighting do not emit. IR or UV radiation.

LED USAGE

LEDs' near-monochromatic nature makes them particularly efficient for colored light applications. In traffic lights, for example, LEDs have largely replaced the old incandescent + colored filter systems. While a red filter on an incandescent lamp can block go percent of the visible light from the lamp, red LEDs provide the same amount of light for about one-tenth the power (12 watts compared to 120+ watts) and last many times longer.

LED (Light Emitting Diode) lighting is rapidly changing. Everything you previously knew about LEDs is probably outdated.

With their other unique characteristics — low profile, lower energy consumption, good performance in cold environments, and breakage resistance — LEDs are well suited to a variety of indoor and outdoor signage.



PUTTING LEDS TO WORK

One way businesses can take advantage of LEDs' efficiency is by replacing incandescent exit signs, which operate continuously, with LED exit signs. A relatively fast and inexpensive project, even smaller buildings can realize solid energy savings. A typical exit sign's electricity consumption drops from about 40 watts (incandescent) to about 5 watts, saving 300 kWh per year, per sign.

	Desig	n Performance Inc	centive	
Exit Sign Lighting Technology	Exit Sign Lighting Technology	Exit Sign Lighting Technology	Exit Sign Lighting Technology	Annual Carbon Dioxide (CO₂) Pollution
LED	44 kWh	\$44	10+ years	72 pounds
Fluorescent/CFL	140 kWh	\$11	10.8 months	230 pounds
Incandescent	350.kWh	\$28	2.8 months	574 pounds

Assumes 24-hour, 365-day-per-year operation at an average electricity cost of \$0.08 per kWh. Exit sign electricity consumption is assumed to be 40 watts for incandescent signs, 16 watts for fluorescent signs, and 5 watts for LED signs. Actual sign wattages may vary. Pounds of pollution are based on the national average emissions factor for electricity generation in the United States, 1.64 pounds CO₃ per kWh. Source: ENERGY STAR®.

LED REFRIGERATION CASE LIGHTING

Refrigerated display cases in grocery stores and convenience stores are typically lit by fluorescent systems. As temperatures drop, however, light output for fluorescent lamps can decrease by as much as 60 percent. LED lighting actually performs better in colder temperatures and LED lighting uses half the energy of fluorescent systems while emitting less heat.

The low profile of LEDs again is an advantage in the close quarters of a refrigerated display case, and because the light from LEDs can be "aimed," they help make displays effective as well as efficient. Replacing fluorescent refrigerated case lighting with LED illumination can qualify for prescriptive incentives of \$20 per door.

LED exit signs also require less maintenance and are typically brighter than comparable incandescent or fluorescent lights, a benefit in an emergency. ComEd's Smart Ideas for Your Business™ program offers incentives of \$20 per exit sign to help offset the retrofit cost.

LEDs are also being used in outdoor channel signs to reduce energy and maintenance costs. Strings of LEDs can take the place of neon as well, and lighting manufacturers continue to create new ways to use LEDs in signage. ComEd's Smart Ideas for Your Business program offers incentives for replacing incandescent, neon and other low-efficiency signs with LED signs, ranging from \$6 to \$25 per sign.

PARKING LOTS AND OTHER OUTDOOR AREAS

Recent advances in LED technology have resulted in a new option for lighting outdoor areas, including streets, roadways, parking lots and pedestrian areas. LEDs offer several potential advantages over metal halide and high-pressure sodium lighting:

- Without glass or filaments, LED lights are less prone to breakage from vandalism or accidents.
- M LEDs turn on instantly without run-up time or restrike delay.
- Their compact and low profile size means that even "large" LED fixtures producing thousands of lumens can be lower-profile than their HID counterparts.
- Their directional light emission reduces light trespass and "sky glow."
- Cold environments do not affect them.
- They contain no mercury, lead, or other known disposal hazards.

Outdoor LED installations may qualify for custom incentives of \$.07 per kWh saved from ComEd's Smart Ideas for Your Business.

SPECIFICATIONS FOR LED LIGHTS

ComEd's Smart Ideas for Your Business program has defined specifications that LED lights must meet to be eligible for incentives. These specifications are detailed on the application form

- All new exit signs or retrofit exit signs must be UL924 listed, have a minimum lifetime of 10 years and have an input wattage ≤ 5 watts per face.
- LED recessed downlight luminaires up to 18 watts or screw-in base lamps must have a minimum efficacy of 35 lumens per watt and must meet ENERGY STAR® version 1.1 criteria.
- Other LED lamps and downlight luminaires over 18 watts must:

 Be tested to IESNA LM-79-08 an industry standardized test procedure that measures the performance qualities of LED luminaires and integral lamps by a third-party
 - DOE-accredited lab.

 Carry a warranty on the light source and power supplies of three years or more.
 - Have a minimum efficacy of 35 lumens per watt.
 - Have a CRI of 75 or above.

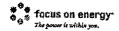
FOR MORE INFORMATION

Contact the Smart Ideas team at 888-806-2273, visit www.ComEd.com/BizIncentives or send an e-mail to ComEdSmartIdeas@KEMA.com.





Talle in a fallightean	TEENFELVIESE TO	
Equipment Type Hardwired Compact Fluorescent Fixtures	Mcentive	Unit
29W or Less	\$25.00	Fixture
30W or Greater	\$50.00	Fixture
Permanent Lamp Removal (Pre-Approval Application (s Required)		
Remove 4-foot Lamp	\$6.00	Lamp
Remove 8-foot Lamp	\$8.00	Lamp
Remove 4-foot Lamp with Reflector	\$12.00	Lamp
Remove 8-foot Lamp with Reflector	\$16.00	Lamp
High Performanceiör Reduced Wattage 4-foot T8		
4-foot Lamp and Ballast	\$5.00	Lamp
4-foot Reduced Watt Lamp Only	\$1,00	Lamp
Reduced Wattage 8-foot T8		
8-foot Lamp and Ballast	\$6.00	Lamp .
8-foot Lamp Only	\$1.00	Lamp
Specialty T8 Lamps and Ballasts		
4-foot U Tube and Ballast	\$3.00	Lamp
2-foot Lamp and Ballast	\$3.00	Lamp
3-foot Lamp and Ballast	\$5.00	Lamp
LED Lighting		
LED T-1 or Electroluminescent Exit Signs	\$20.00	· Signs
LED Lamp/Fixture	\$10.00	Lamp
LED Open Sign	\$40.00 -	Fixture
LED Channel Sign ≤ 2 feet Interior	\$10.00	Letter
LED Channel Sign > 2 feet Interior	\$25.00	Letter
LED Channel Sign ≤ 2 feet Outdoor	\$6.00	Letter
LED Channel Sign > 2 feet Outdoor	\$20.00	Letter
Netal Halide	Water State of the	
Integrated Ballast Ceramic Metal Halide Lamps	\$5.00	Fixture
Pulse Start or Ceramic, 100W or Less	\$20.00	Fixture
Pulse Start or Ceramic, 101W – 200W	\$35.00	Fixture
Pulse Start or Ceramic, 201W – 350W	\$40.00	Fixture
nduction Lighting		
Interior Induction Fixture	\$30.00	Fixture
old Cathode		
Cold Cathode	\$3.00	Lamp
Controls		
Occupancy Sensors	\$0.09	Connected Watts Controlled
Plug Load Occupancy Sensor	\$20.00	Sensor
Bi-Level Stairwell /Hall /Garage Fixtures w/ integrated sensors	\$25.00	Fixture
T8/T5 New Fluorescent Fixtures with Electronic Ballast (Pre-Approval Application is Required)		
Bniof Project Description include quantity and fixture waitages) or attach an itemized project plan	\$0.30 or maximum \$100 / fixture	Watts Reduced



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Home > About Us > Organizational Structure

Organizational Structure

Act 141 provides that the investor-owned electric and gas utilities must collectively establish and fund the statewide energy efficiency and renewable energy programs. To fulfill their obligations under Act 141, the energy utilities have formed the Statewide Energy Efficiency and Renewable Administration or "SEERA." The primary organizations that make up the Focus on Energy Program and their responsibilities are as follows:

Public Service Commission of Wisconsin

The Public Service Commission (PSC) has oversight of the statewide energy efficiency and renewable energy programs. This includes: review and approval of the program administrator(s) selected by the utilities and of the contracts between the utilities and the program administrator for administration of the statewide programs; contracting with one or more independent parties for an annual performance evaluation and financial audits of the statewide programs; requiring each energy utility to spend the amount required to fund statewide energy efficiency and renewable resource programs; and managing day-to-day program activities.

SEERA

SEERA creates and funds statewide energy efficiency and renewable energy programs. SEERA also contracts, on the basis of competitive bids, with one or more persons to administer the programs. SEERA has no obligations regarding the statewide programs other than creating and funding the programs and contracting for their administration.

Program Administrators

Wisconsin Energy Conservation Corporation (WECC) is the program administrator for the Focus on Energy Business, Residential and Renewable Energy Programs. The Energy Center of Wisconsin is the program administrator for the Environmental and Economic Research and Development Program.

Fiscal Agent

Wipfli LLP, in a fiduciary capacity, receives, distributes and accounts for statewide energy efficiency and renewable energy funds under Act 141.

Evaluation

PA Consulting Group, Inc. leads a team of evaluation experts to quantify the energy saving impacts of the Focus on Energy Program on Wisconsin's citizens and economy. The evaluators are charged with independently verifying program administrator reports of energy savings.

Compliance Agent

Virchow, Krause & Company, LLC performs audits to ensure that Program Administrators, contractors and subcontractors comply with the Policy and Procedures Manual created for the Focus on Energy Program as well as all contractual requirements.

Focus on Energy Organizational Chart



Contact Us Evaluation Reports Site Map Search:

Financial Incentives and Cash-Back Rewards Overview

Home > Incentives > Residential > Cash-Back Rewards > Lighting

Residential Incentives

Lighting Rewards

Business Incentives

sizes to compliment any room. For more information on lighting products, visit our <u>Lighting</u> page.

Renewable Energy

If you have any questions, please contact Wisconsin's Focus on Energy Information Center at 800.762.7077 or e-mail us at ESinfo@focusonenergy.com.

Incentives

Compact Fluorescent Light Bulbs (CFLs)

Tax Incentives

Dates: now until December 31, 2010 Reward Amount: \$2 per light builb

Reward valid on ENERGY STAR qualified bulbs in single or multi-packs only. Limit 12 bulbs per customer. (Minimum purchase price \$0.97 per buib after mail in reward (not including tax) even when in a multi-pack).

Lighting Rewards are listed by product type. ENERGY STAR® qualified bulbs, fixtures, and torchieres are available in dozens of styles and

\$2 Maff-in Coupon for CFLs

Printable Version

Fluorescent Torchieres, Fixtures and Ceiling Fans

Dates: now until December 31, 2010

Reward valid on ENERGY STAR qualified fluorescent fixtures, torchieres and/or ceiling fans with qualified light fixtures.

Limit 12 per customer.

\$15 Mall-in Coupon on fixtures



Dates: now until December 31, 2010

Reward valld on ENERGY STAR qualified LED Fixtures.

Limit 12 per customer.

\$30 Cash-Back Reward per fixture

Mali Reward forms to:

Focus ENERGY STAR Lighting c/o EFI Fulfillment Center 40 Washington Street, Suite 2000 Westborough, MA 01581-1013

Important Information

Focus on Energy offers are available to customers of participating Wisconsin electric providers only, for a limited time, are good while supplies last, and may not be combined with any other utility offer.



LIGHTING INCENTIVE APPLICATION FOR EXISTING BUILDINGS

OFFICE USE ONLY PROJECT ID:

THIS INCENTIVE APPLICATION FORM IS VALID FROM JANUARY 1, 2010 TO JUNE 30, 2010. INCOMPLETE APPLICATIONS WILL BE RETURNED. YOU MAY ALSO COMPLETE AND SUBMIT THIS APPLICATION ONLINE AT WEBFORMS.FOCUSONENERGY.COM/BUSINESSLIGHTING.

Focus incentives are subject to change. Please visit focusonenergy.com/incentives/business to ensure you are using the most current form.

INSTRUCTIONS FOR COMPLETING THIS FORM - PLEASE READ

- The specifications for eligible equipment are listed within each lighting technology on this form, if the technology you are installing is specified differently than how it is listed on this form, please call to verify eligibility. Custom incentives are available for many technologies not listed. Some technologies require additional information that must be filled in under "Specifications and Required Information" column. Replacements are one for one unless specified.
- This form must accompany an **Itemized** invoice with quantity, manufacturer, model number, date and cost for each piece of equipment for which an incentive is expected. High Performance T8 and Low Watt T8 systems require manufacturer and model number for ballast and lamps to appear on invoice. Incomplete applications or invoices will significantly delay processing of incentive. Replaced equipment must be removed from service.
- Outdoor lighting projects are NOT eligible for prescriptive incentives, but may be eligible for custom incentives. ALL CUSTOM INCENTIVES MUST BE APPROVED BY Focus on Energy PRIOR TO EQUIPMENT PURCHASE.
- Post installation light levels are expected to meet current IESNA recommendations and comply with all applicable electrical, safety and energy codes. Fixtures must be UL listed.
- Dairy and Livestock Lighting Incentive Requirements: All fixtures installed in animal housing or milk house area must conform to National Electric Code 547 (i.e. wet location, sealed and gasketed fixtures).

location, sealed and gaskete		les for all itama varia	ro requesting on inc	antiva for
LIGHTING TECHNOLOGIES - THE	5 FORM IS USED FOR EXISTING BUILDINGS ONLY. Please fill in blan INCANDESCENT REPLACEMENTS	ks for all items you a	ne requesting an inc	engve son.
Equipment Type	Specifications and Required Information	Incentive	Quantity	Total
	Compact Fluorescent Lamp (CFL) or Cold Ca with CFL or cold cathode screw-in lamps and/or permanently wired fi neandescent only. Rebated bulbs may not be used for resale or gives	xtures with pin based		
CFL Lamps	Replace 100W or less incandescent with CFL up to 32 Watts. Screw base only.	\$2/Bulb Limited to 50% of product cost up to \$2/bulb		
CFL Reflector Flood Lamps	Replace 100W or less incandescent with CFL flood lamps with integrated reflector up to 30 Watts, Screw base CFLs only.	\$4/Bulb		
High Wattage CFL Lamps	Replace a greater than 100W incandescent lamp with CFL from 33-115 Watts. Medium Edison screw base CFLs only.	\$5/Bulb		
CFL Fixtures	Replace incandescent fixtures with permanently-wired new fixtures containing pin-based CFL lamps.	\$20/Fixture		
	Low Wattage Ceramic Metal Halide (CMHs or lamps with ceramic metal halide (CMH) fixtures or self ballasted over than existing total incandescent wattage to qualify.		sted below.	
CMH Fixtures 20-100 Watts	Incentive is for complete hardwired fixtures containing qualified CMH lamp and ballast.	\$50/Fixture		
	Incandescent Wattage Removed			
CMH Integral Ballast Lamps	Retrofit existing 70-100W incandescent flood or spot lamps with ≤25W Ceramic Metal Halide reflector lamp with integrated ballast.	\$15/Lamp		
Replace Incandescer Product must appear	ENERGY STAR® Qualified LED Downlights at fixtures with complete replacement luminaire unit including housing on ENERGY STAR SSL qualified products list. Please see focusonenerg	g, trìm, reflector, lens	s, heat sink, driver a siness/lighting.aspx f	nd light source. or more information.
ENERGY STAR LED Recessed Downlights	Replace 60-100W incandescent with ENERGY STAR qualified LED recessed downlight ≤18 Watts.	\$30/unit		
<u></u>	LINEAR FLUORESCENT—HIGH EFFICIENCY LOW GLAR	E FIXTURES		
Please verify approved product TS lamps and ballast must be	High Efficiency, Low Glare 2'x4' Recessed fixtures as difixture containing 3 or 4 lamp F32T8 or F40T12 with a new High Efficit list at focusonenergy.com/businesslighting or call for preapproval. listed on CEE High Performance T8 list to qualify. T5 fixtures must crating advanced lighting distribution and glare control optics. Specula	dency/Low Glare 2' x Fixture efficiency must contain 2 F28T5 lamp	st be 80% or greater os (T5H0 are not elig	(ible).
2 lamp F28T5 Recessed Indirect Fixture	Fixture Model #	\$10/Fixture		
2 lamp HPT8 High Efficiency Recessed Fixture	Fixture Model #Ballast Model# Lamp Model #	\$10/Fixture		

FORM SUBMITTAL: Return signed, completed form and ITEMIZED invoice within 30 calendar days of installation to:

Mail: Focus on Energy, Business Programs Incentives, 431 Charmany Drive, Madison, WI 53719

Email: Applications and invoices can be scanned and emailed to BPforms@weccusa.org Fax: 608.237.2

Best viewed and printed on legal size paper ENERGY STAR Qualified Commercial LED Lighting Last Modified: 02/12/2010

The product specifications listed below are based on tested values according to the ENERGY STAR Solid-State Lighting Luminaire Program Requirements. Values displayed on product packaging and marketing materials may differ.

Γ		****	f .	College Service	1		È		1 8		6		# 8
		Notes	Must be used with one of the following times to maintain ENERGY STAR qualification: IL400SC, TL400H, TL400WH, TL402WS, TL402WSSCS, TL402WS, TL403WBS	Mart to just with one of the following the state of the following the conditioning the following the	Must be used with one of the following trims to maintain ENERGY STAR qualification: TL400SC, TL400WH, TL400WH, TL402MS, TL402WS, TL402WS	Most be used software of their collaborate transport published in their collaborate transport of their collaborate transport	Must be used with one of the following trim to maintain ENERGY STAR qualification: 493HS06, 493SCS06, 493WBS06.	Must be used with angest fire- following rems to majority. PAPEROS STAR qualification SAMBING AVAILUGE ASSECTION SAMBING AVAILUGE ASSECTION	Must be used with one of the following Irim to maintain ENERGY STAR qualification: 493HS06, 493SCS06, 493WBS06.	Munths med spilt one of the lollowing frames of parameter for the control of the lollowing frames of t	Must be used with one of the following trim to maintain ENERGY STAR qualification: 493HSO6, 493WBSO6.	forusesyllidite following: inmergosyyans estabilities dayscolossissport 499 trassoc	For use with the following trims:## 493HS06 # 493SCS06 # 493WBS06 # 493SNS06 #
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	,	Wattage (Iumens)	71		4 1	15	51	53	15	2		##	4
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3	facturer	Name	Cooper Lighting	Coppet Library	Cooper Lighting	Coppe Lighting Section	Cooper Lighting	Cooper Lighting	Cooper Lighting	Cooper Lighting	Cooper Lighting	Cooper Lighting	Cooper Lighting

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)T(oun	F.		*. 333***IN	1 1			Brand Pro Senes	Direct Wire	Pro Series Direct Wire	Lithoma Lighting	Tablica II	Lithonia Lighting	Librais Lighting	Lithonia	Philips Color Kinelics	Philips Color Kinetics	Philips Color Karetas	Philips Color Kinerics	Philips Color Surelies and		Precolite		
Juno Lighting, Inc.	Jume Lighting, Inc.	Juno Lighting. Inc.	tuno Lighting Inc.		Kichler Lighting	Kichler Lighting		Manufacturer	Name		Kichier Lighung	Lithonia Lighting	Crisera Elginos	Lithonia Lighting	Lithonia Lighting	Lithonia Lighting	Philips Solid-State Lighting Solutions, incest	Philips Solid-State Lighting Solutions, Inc.	Philips Solid-State Lighing Solutions, Inc.	Philips Solid-State Lighting Solutions, Inc.	Philips Solid-State Laghing Solutions Inc. 82	Philips Solid-State Lighting Solutions, Inc.	Precoline, Inc.	Prescolite, Inc.	Presculturing and

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686.0	0860	0.989	2860	0.982	0.982	86.0	860	0.99	660	86.0	860	86.0	0.87	76.0	260	0.974		Factor	-	0.974	0.976	0.974	0.974	260	0.97	0.97	0.97	0.97
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Prescolite, Inc.	Prescription of the second	Prescolite, Inc.	Presculte, Inc	Prescolite, Inc.	Prescolite, Inc.	Renaissance Lighting, Inc.	Renassurce Lighting, Inc. 1	Renaissance Lighting, Inc.	Recursance Lighting, Inc.	Renaissance Lighting, Inc.	Renaissance Lighting, Inc.	Renaissance Lighting, Inc.	Recensuance Lighting, Inc.	Renaissance Lighting, Inc.	Remissance Lighting, Inc.	Renaissance Lighting, inc.	,	Name	Renaissance Lighting, Inc.	Renausance Lighting, Inc.	Renaissance Lighting, Inc.	Remissance Lighting, Inc.	Retaissance Lighting, Inc.	Renasseance Lighting Inc.	Renaissance Lighting, Inc.	Recoluscance Elghling, Inc.	Renaissance Lighting, Inc.	Resolution of Light Market Solidor Solidor EVID SPC-CL Market plus

Renaissance Lighting, Inc.	Solia	4DR5-41K-S	Recessed	42.6	11	727	35000	1				The second secon
		4DS4-27K-M	downlights Recessed						000+	1/15/2010		
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Recommence Lighting, Inc.	Solia		Recessed downlights	39.7	611		0 00055	760	3500	2.10/2009		
hling, Inc.	Solia	4DS441K-M D-SPC-CL	Recessed	44.3	12.03	533	35000	10.07	4(100	12/10/2009		
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-		-MD-DIF-CL	downlights			533	35000		4000	5002/01/21	- 24.12	
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Renaissance Lighting, Inc.	REVIA	× 1	Recessed	40		1137						(Milesa XII)
		٦í	downlights						3500	9/17/2009		
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ting, Inc.	REVIA	1	*			···	T	******		7		NOTES
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COMMERCIAL REFRIGERATION INCENTIVE APPLICATION

OFFICE USE ONLY PROJECT ID:

THIS INCENTIVE APPLICATION FORM IS VALID FROM JANUARY 1, 2010 TO JUNE 30, 2010. INCOMPLETE APPLICATIONS WILL BE RETURNED.

Focus incentives are subject to change. Please visit focusonenergy.com/incentives/business to ensure you are using the most current form.

COMMERCIAL REFRIGERATION REQUIREMENTS:

GENERAL REQUIREMENTS

- Grocery, convenience and other retail stores served by qualifying utilities with refrigerated or frozen food display cases are eligible for these incentives. Check
 the Focus on Energy website (www.focusonenergy.com) to verify eligibility.
- Include brand name and model number of equipment / control system that is installed on invoice.
- 3. For multiple locations, a spreadsheet can be submitted as a substitute for multiple applications. Spreadsheets for a variety of technologies can be found at focusonenergy.com/spreadsheet.

A. Anti-Sweat Heater Controls

- 1. Install equipment that senses the relative humidity in the air outside of the display case and reduces or turns off the glass door (if applicable) and frame anti-sweat heaters at low humidity conditions.
- 2. Equipment must control heaters on frame and mullion in all instances, and door, if equipped with heater.

B. Efficient Reach-In Cooler Case Doors

- 1. For refrigerated cooler case applications, only no-heat doors qualify; low-heat doors are not eligible.
- 2. Both no-heat and low-heat doors qualify if used on freezer cases.

C. LED Lighting in Reach-In Freezer or Cooler Case

- Incentives are available for retrofits in existing refrigerated display cases and for new installations. Retrofit projects must completely remove the existing fluorescent fixture end connectors and ballasts to qualify (wiring may be reused).
- 2. Please enter the quantity of doors converted to LED lighting, not the number of fixtures.
- 3. Product must include a five-year manufacturer warranty.

D. Occupancy Sensors for LED Lighting in Reach-in Cases

- 1. Sensors for both end-of-aisle and individual cases qualify.
- 2. Please enter the quantity of doors controlled by sensors, not the number of sensors.

E. Efficient Fan Motors in Reach-in Case

1. Incentives are available for ECM (electronically commutated motor) and PSC (permanent split capacitor) fan motor retrofits in existing refrigerated display cases and for new installations. New PSC motors must replace shaded pole (S-P) motors. New ECM motors may replace either S-P motors or PSC motors.

F. Efficient Fan Motors in Walk-in Freezer or Cooler

 incentives are available for ECMs replacing shaded pole motors or PSC motors on existing walk-in freezer and walk-in cooler evaporator fans (does not include condenser fan motors). Incentive not available for equipment in new walk-in freezers or coolers.

G. Night Curtains for Open Coolers

- 1. Applies to professionally-installed, "permanent", low emissivity (reflective) night curtain products only.
- Linear foot measurement is the side-to-side (not top to bottom) measured width of all installed night curtains.

H. Beverage Cooler Controls

- 1. Controls must be applied to self-contained commercial merchandising beverage coolers only. Coolers must have see-through doors, may or may not have interior lighting, and must have net capacity >8 cubic feet.
- Controls must include a passive infrared occupancy sensor to turn off lights and compressor when surrounding area is unoccupied for preset length of time. Control should periodically power up machine at intervals to maintain product temperature and provide compressor protection. For coolers containing non-perishable beverages only.



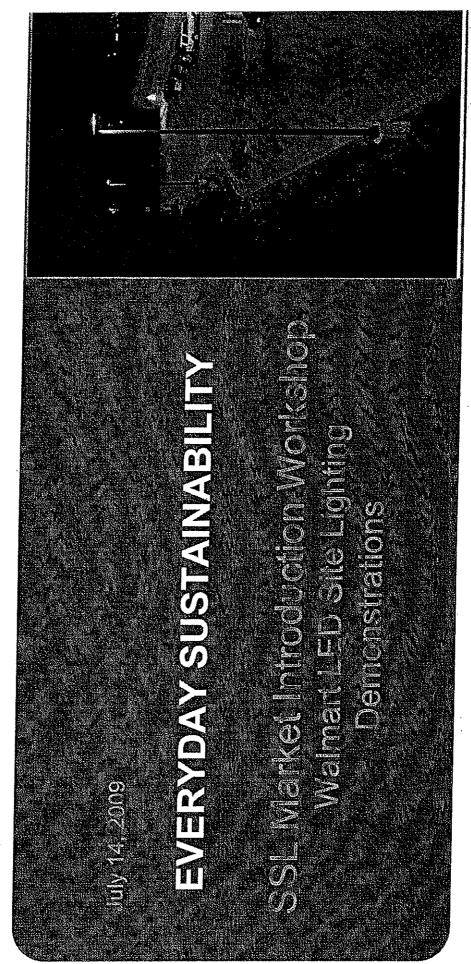
COMMERCIAL REFRIGERATION INCENTIVE APPLICATION

OFFICE USE ONLY PROJECT ID:

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	Measure	Quantity Installed	incentive	SUBTOTAL
		# of Standard Doors	\$40 per Door	
	for Freezer Case	# of Low-Heat Doors	\$40 per Door	
Anti-Sweat Heater Controls		# of No-Heat Doors	\$40 per Door	
ileater controls		# of Standard Doors	\$40 per Door	
	for Cooler Case	# of Low-Heat or No-Heat Doors	\$40 per Door	
		# of Low-Heat Doors	\$50 per Door	
Efficient Reach-In Case Doors	for Freezer Case Door	# of No-Heat Doors	\$100 per Door	
Jase 20015	for Cooler Case Door	# of No-Heat Doors	\$10 per Door	
ED Lighting in Reach-	in Freezer or Cooler Case	# of Doors Converted to LED	\$25 per Door	
Occupancy Sensors fo	or LED Lighting in Reach-in Cases	# of Doors Controlled	\$10 per Door	
n Reach-in Freezer or	Cooler Case:	# of ECM Motors	\$30 per Motor	
	eplacing Shaded Pole Motors	# of PSC Motors	\$15 per Motor	
**************************************		# of ECM Motors Replacing Shaded Pole Motors <1/20th hp	\$30 per Motor	
		Installed in: Freezer 🖸 Cooler 🔾	450 per motor	
n Walk in Franzer or C	ooler: ECM Evaporator Fan Motors	# of ECM Motors Replacing Shaded Pole Motors ≥1/20th hp	\$60 per Motor	
Replacing Shaded Pol		Installed in: Freezer 🗆 Cooler 🗅	400 per motor	
		# of ECM Motors Replacing PSC Pole Motors >1/10th hp	\$40 per Motor	
		Installed in: Freezer 🖸 Cooler 🗖	\$40 per Motor	
Vight Curtains for Ope	en Coolers	# of Linear Feet Covered	\$9 per Linear Foot	
Beverage Cooler Cont	rols	# of Beverage Coolers Controlled	\$60 per Cooler	





ANN LEDS TOROGRAPHON

Recluse maintenance

•Fewer lamps to replace & dispose

Modern energ

- ∙Less site wattage
- Instant re-strike and dimming
- Lower LPD (better utilization of less light)

Recluse wester. Hour

- Less light frespass with reduced shielding
 - •No uplight

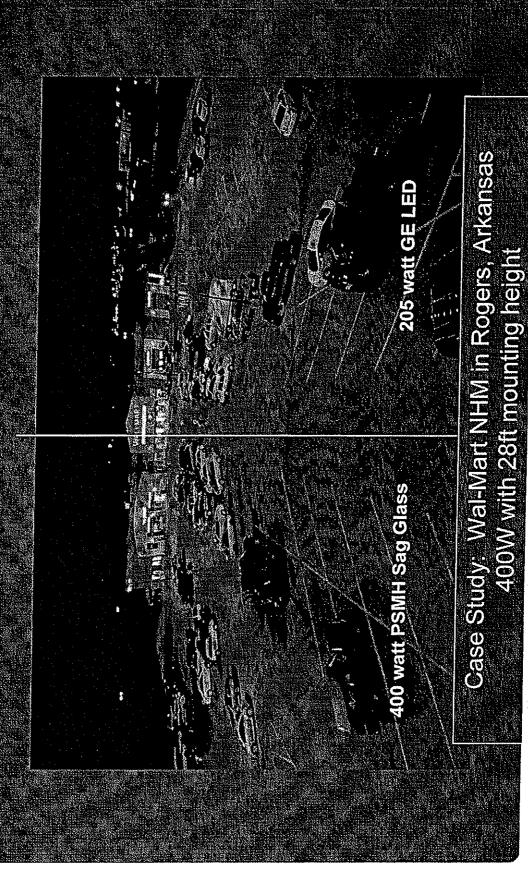
mprove Visibility

- Smoother visual transition due to uniformity
 - Better vertical Illuminace

Shoundankally consciouted

- Reduce hazardous waste
- Reduce energy consumption

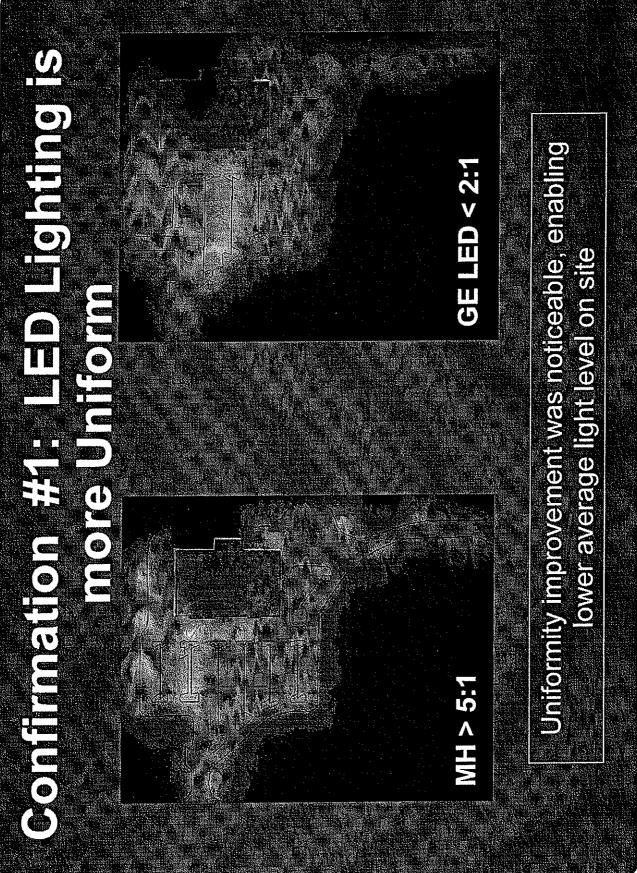




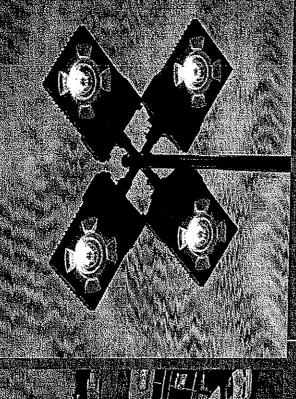
Valmart Save money, Live better,

3 SSL Market Introduction Workshop July 14th, 2009

SSL Market Introduction Workshop July 14th, 2009



Confirmation #2: Effective LED Lighting Design will Reduce Site Energy



GETED

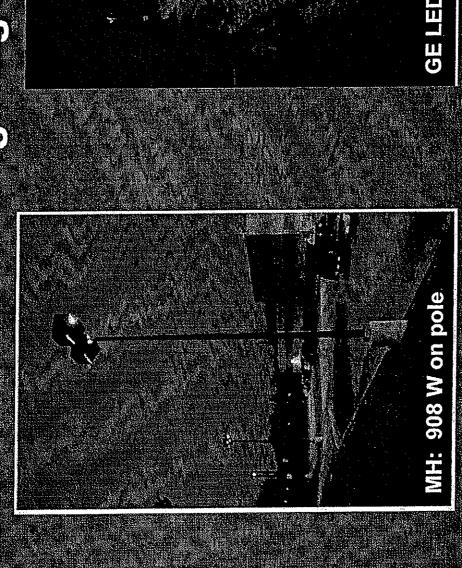
5.6 kW 0.029 W/sq ft

<u>MH 400W</u> Site Wattage 16.8 kW LPD (lighting power density) $0.086~\mathrm{W/so}$ ft

>65% reduction in site energy saving \$4,900/yr*

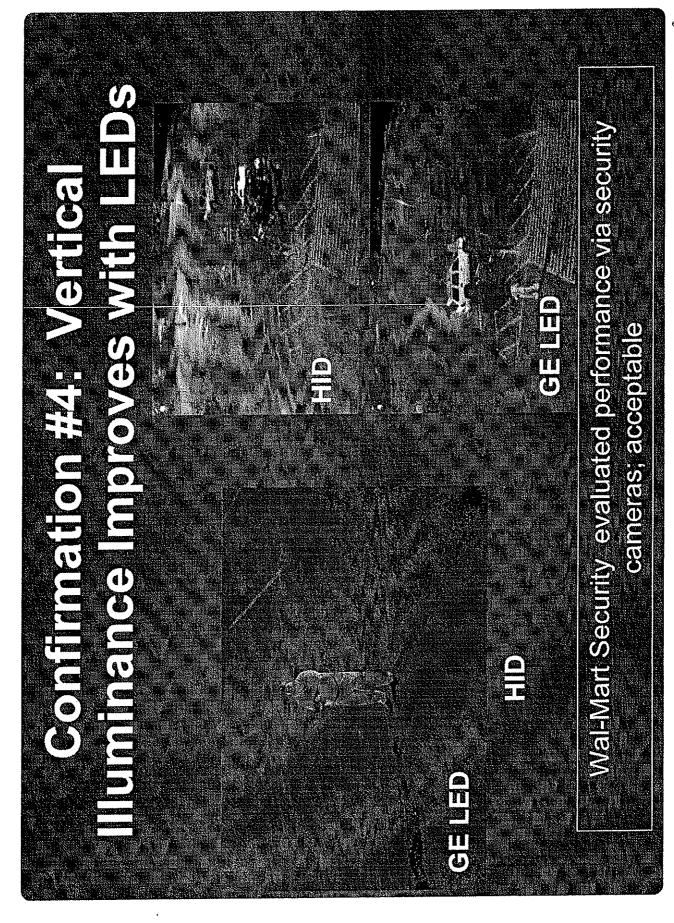


Address Parimeter Lighting Raquiffaments Confirmation#8+ LEDs more Efficiently

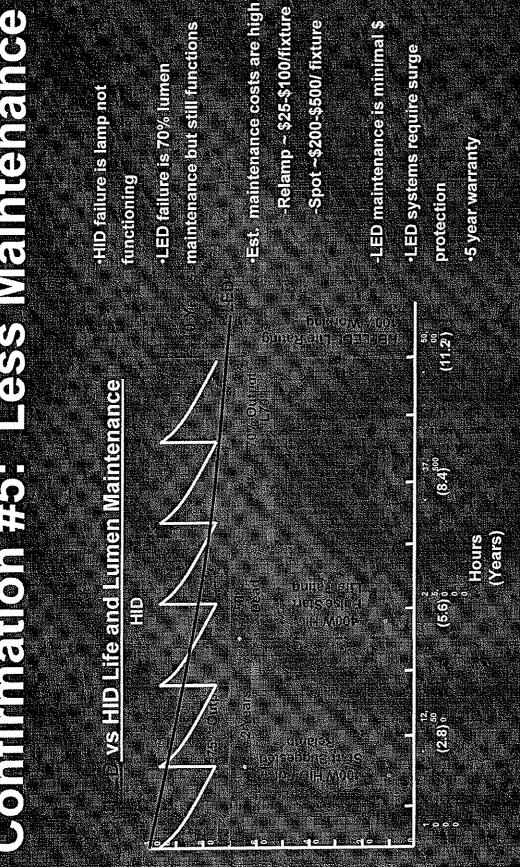


GE LED: 200W on pole

 LED is a great solution for tight local ordinances



Continuition #5: Less Maintenance



999

-EDs increases Wal-Mart's relamp cycle and reduce spot replacement



CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Direct Testimony of Geoffrey C. Crandall, was served upon the persons listed below via electronic mail on this 17th day of February, 2010.

/s Michael E. Heintz Michael E. Heintz

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in

Case No(s). 09-1947-EL-POR, 09-1948-EL-POR, 09-1949-EL-POR, 09-1942-EL-EEC, 09-1943-EL-EEC

Summary: Testimony of Geoffrey C. Crandall, plus exhibits, electronically filed by Mr. Michael E Heintz on behalf of Environmental Law and Policy Center