BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019	)))))))	Case No. 16-0743-EL-POR

REPLY BRIEF OF ENVIRONMENTAL LAW & POLICY CENTER, THE NATURAL RESOURCES DEFENSE COUNCIL, THE OHIO ENVIRONMENTAL COUNCIL, AND THE ENVIRONMENTAL DEFENSE FUND

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I. INTRODUCTION

Environmental Law and Policy Center, Ohio Environmental Council, Natural Resources Defense Council, and Environmental Defense Fund ("Environmental Intervenors") continue to support the Revised Plans proposed by the Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company ("FirstEnergy" or "Companies") as filed. The initial briefs of the Staff of the Public Utilities Commission ("Staff") and the Office of the Ohio Consumers' Counsel ("OCC") argue for modification of the Revised Plans to add a cost cap. However, both parties fail to address the fundamental flaw that neither party has analyzed the effect the proposed cost cap will have on customer savings from the Companies' efficiency programs and the resulting bill impacts, focusing their attention solely on rider costs. This focus is misplaced. Though many utility bill riders pay for services that provide no direct financial benefit to customers, the efficiency rider actually drives down costs for all customers. It is the only rider that lowers bills, and the Commission should not limit these customer benefits.

Ohio law requires stipulations to meet three criteria: (1) Is the settlement a product of serious bargaining among capable, knowledgeable parties?; (2) Does the settlement, as a package, benefit ratepayers and the public interest?; and (3) Does the settlement package violate any important regulatory principle or practice? *In re Columbus S. Power Co.*, Case Nos. 11-346-EL-SSO, *et al.*, Opinion and Order (Dec. 14, 2011) at 27. Environmental Intervenors fully addressed these criteria in our Initial Brief, but in this Reply will focus on the benefits to customers and the public interest.

The Revised Plans and proposed cost cap must be analyzed holistically. While the energy efficiency programs will lower bills and benefit customers, imposing a cost cap will deprive customers of value. It will force arbitrary program changes leading to poor results and less effective use of customer money. In their initial briefs Staff and OCC do not provide credible evidence rebutting these concerns, offering only cursory and unsupported suggestions as to how FirstEnergy might comply with the proposed cost cap. They simply have not met their burden of establishing that imposing a cost cap on the Revised Plans would benefit ratepayers and the public interest.

II. ARGUMENT

A. The Revised Plans Optimize Customer Savings, and a Cost Cap Would Only Harm Customers.

Staff's main argument for a three percent cap is that it will reduce the cost of the rider. Staff states, "The Companies' riders for their energy efficiency programs are among the largest riders on customers' bills." Staff Initial Br. at 4. However, as Environmental Intervenors' witness Chris Neme points out, the cap concept "ignores the benefits of the additional efficiency potential beyond the fixed amount." Env. Int. Ex. 1, Neme Rebuttal at 7:88-89. Most importantly, though, Staff does not compare the rider's costs with the rider's benefits.

The whole concept of energy efficiency is to help customers use less energy and lower their bills. As the Commission has stated:

> To the extent the Companies accelerate the delivery of cost-effective energy savings opportunities to their customers, they will also accelerate the net savings which customers enjoy. Thus, every kWh of energy that can be displaced through cost-effective energy efficiency programs is a savings, not a cost to the Companies' customer.

In re FirstEnergy ESP IV, Case No. 14- 1297 EL-SSO, Opinion and Order (Mar. 31, 2016) at 95 (citing Case No. 09-1947, Entry on Rehearing (Sept. 7, 2011) at 6). Consistent with the Commission's point, energy efficiency benefits non-participants by suppressing the market price of electricity. ELPC Ex. 1, Staff Report to the Energy Mandate Study Committee at 12 (Nov. 26, 2014). Energy efficiency also helps delay the need for both new power plants and investment in delivery infrastructure. Yet Staff's initial brief fails to analyze these benefits alongside the costs, despite the Commission's own finding that efficiency saves consumers money on their energy bills.

Staff also provides no analysis to support its argument that, "A cost cap requires the Companies to pick the most cost effective and efficient means of achieving their benchmarks, thus avoiding unnecessary charges to customers." Staff Initial Br. at 9. While this statement sounds logical, in practice the opposite is true. The record clearly indicates that the proposed cost cap will reduce the quality of the programs and therefore customer savings opportunities. Env. Int. Initial Br. at 11-13. This will occur because the proposed cap covers both program spending and shared savings. In order to earn shared savings, FirstEnergy must exceed its savings targets. However, while Environmental Intervenors agree with OCC that FirstEnergy is not entitled to shared savings (OCC Initial Br. at 17-18), not taking into account *any* incentive under a cost cap – as Staff and OCC have done here – is simply unrealistic. The Companies will undoubtedly seek to exceed its annual targets and receive at least some incentive level, constraining its program spending under the cap. The result is likely to be a diminished, less balanced portfolio that sacrifices cost-effective, longer-term benefits in favor of programs with savings that are cheaper in the short run. For example, Mr. Neme outlines the critical difference in focusing on short-term savings versus long-term:

> FirstEnergy's Residential Behavioral program provides first year savings very inexpensively, at only 5.5 cents per kWh. However, those savings are only forecast to last one year, rendering its program cost per lifetime kWh saved also 5.5 cents. In contrast, a small business LED linear light fixture has a rebate cost that is nearly twice as great (10 cents) per first year kWh saved, but only one-eighth the cost per lifetime kWh saved (0.7 cents) because its savings last 15 years.

Env. Int. Ex. 1, Neme Rebuttal at 9 (footnotes omitted).

He goes on to point out the consequences for the Revised Plans:

> Thus, Staff's proposed cost cap would force FirstEnergy to attempt to minimize costs per first year kWh, without consideration for value of the savings they produce over their full life (let alone the other benefits they might provide). This will create a perverse incentive that may drive FirstEnergy to alter its program mix, and to invest more in some measures and programs that have lower value to consumers, and comparatively less in other measures and programs that have more value to consumers.

Id. at 9. Mr. Neme goes into further detail on this issue in his testimony. *Id.*

The thorough process the parties went through to agree on the Revised Plans and accompanying budget protects against such consequences, whereas the cost cap supported by Staff and OCC offers no safeguards against deterioration in program quality and total savings. Env. Int. Ex. 1, Neme Rebuttal at 32. The bottom line is that Environmental Intervenors worked very hard with FirstEnergy and other intervenors to optimize the portfolio and ensure the program mix takes the longevity of savings and other critical issues into consideration. Staff and OCC fail to address this issue beyond their conclusion that FirstEnergy can somehow do more with less.

The Commission's recent rulings on stipulations encourage settlement of cases and set a high bar for those opposing utility efficiency plan agreements. The Commission recently rejected intervenors' suggested reallocation of incentive funding in an efficiency plan in the Columbia Gas demand-side management case, holding that "the record does not include sufficient information of the cost-effectiveness of the Simple Energy Solutions program if revised as opposing intervenors recommend." *In re Columbia Gas*, Case Nos. 16-1309-GA-UNC *et al.*, Opinion and Order (Dec. 21, 2016) at 36. The cost cap proposal potentially involves far more drastic alterations to the Revised Plans, such as the wholesale elimination of educational efforts for an entire customer segment, as proposed by OCC (OCC Initial Br. at 19 and Ex. A), or, as raised by Mr. Neme, the elimination of the vast majority of otherwise valuable, cost-effective programs in the Revised Plans that do not satisfy the first-year kWh saved threshold necessary to meet the cap. Env. Int. Ex. 1, Neme Rebuttal at 23-24. OCC and Staff have provided no basis for the Commission to assume that such a fundamental constraint on program design will still allow FirstEnergy to provide reasonable programs for its customers.

B. It Is Unreasonable to Expect FirstEnergy to Rely on Customer Opt-Outs to Comply with the Proposed Cost Cap.

Both OCC and Staff insist that FirstEnergy will be able to comply with the proposed cost cap, at least in part because nonresidential customer opt-outs will lower its baselines, and therefore its compliance benchmarks, for 2017-2019. OCC Initial Br. at 9-14; Staff Initial Br. at 7-8. However, like many of the arguments offered by Staff and OCC, this suggestion lacks any credible supporting analysis. Neither party has offered a witness to analyze the potential for opt-outs, and only OCC even attempts a guess at opt-out levels in its initial brief. Moreover, this belated proffer appears to be based on carefully selected numbers rather than any sound analysis.

OCC points to opt-out levels relevant to the Companies' 2015 baselines, asserting that these levels are predictive of the Companies' baselines (and resulting benchmarks) in 2017-2019. Yet, a simple examination of prior years shows that this purported analysis is misleading at best. As depicted in the table below, opt-outs reduced FirstEnergy's baseline by far less in 2013 and 2014 than in the 2015 example cited by OCC:

	Average Sales Baseline (MWh)	**Overall Compliance Baseline Accounting for Opt-Outs (MWh)**	**Difference**
2013[1]	53,665,317	53,267,903	0.7%
2014[2]	53,727,269	53,115,125	0.1%
2015[3]	53,792,274	47,396,852	11.9%

[1] The 2013 data is from Case Nos. 14-0859-EL-EEC *et al.*, 2013 Portfolio Status Report (May 15, 2014), Ex. 1. The average sales baseline figure for the three Companies is the average of the aggregate 2012-2014 sales figures (column (A) for Ohio.

[2] Case Nos. 15-0900-EL-EEC *et al.*, 2014 Portfolio Status Report (May 15, 2015), Ex. 1.

[3] Case Nos. 16-0941-EL-EEC *et al.*, 2015 Portfolio Status Report (May 12, 2016), Ex. 1.

These results demonstrate that opt-out levels can vary dramatically from year to year, and OCC fails to provide any evidence as to what is likely to happen from 2017-2019.

Furthermore, OCC fails to address the fact that, as its larger customers opt out, FirstEnergy may simultaneously lose some of its most cost-effective savings. The opt-out provisions under R.C. 4928.66(A)(2)(c) and Section 8 of S.B. 310 apply in large part to "mercantile" customers that are significant energy users and therefore have many potential savings opportunities. *See* R.C. 4928.6610; R.C. 4928.66(A)(2)(c). Illustrating this concept, FirstEnergy projects that in 2017-2019 its Mercantile Customer Program, budgeted at $1,464,607, will produce savings of 172,100,000 kWh – representing an acquisition cost of less than 1 cent per kWh for nearly 10% of the projected savings under the Revised Plans.[4] Joint Ex. 1, Stipulation and Revised Plans, Ex. A. If the customers eligible for this program instead opt out, FirstEnergy's baseline will indeed go down, but its program costs may rise disproportionately as the Companies are forced to seek replacement savings from less cost-effective programs. Since OCC offered no analysis of this issue, the Commission cannot know what the overall effect of opt-outs will be on FirstEnergy's ability to comply with the proposed cost cap.

C. OCC Unreasonably Relies on 2015 Program Results as Part of Its Historical Analysis.

OCC continues its pattern of relying on unrepresentative historical results when it asserts that from 2013-2015, "FirstEnergy achieved first-year energy savings at a cost of just 6.3 cents per kWh." OCC Initial Br. at 15. This simplistic claim misleadingly omits a key fact; FirstEnergy suspended the bulk of its efficiency programs in 2015 pursuant to Senate Bill 310. Tr. II at 328:9-11; Case Nos. 12-2190-EL-POR, Finding and Order (Nov. 20, 2014). Because of

[4] Mercantile program savings are projected to be 172,100 MWh, out of total projected savings of 1,781,833 MWh under the Revised Plans.

this suspension, the Companies' program spending significantly decreased to just $27 million in 2015, from an average cost of $53 million in 2013 and 2014. However, as clearly noted in FirstEnergy's 2015 Portfolio Status Report, the Companies still "honor[ed] commitments" in 2015 made as part of its 2014 programs. *See, e.g.*, Case Nos. 16-0941-EL-EEC *et al.*, 2015 Portfolio Status Report (May 12, 2016), at 17. Thus, the Companies "achieved" significant savings in 2015 that were generated by spending in 2014.[5] Hence, while their reported cumulative energy impacts jumped over 650,000 MWh – from 1,450,008 MWh in the 2014 report to 2,107,607 MWh in the 2015 report – there is absolutely no basis for relying on this one-time phenomenon to predict costs and savings levels for future years. *Id.*, Tbl. 2-2; Case Nos. 15-0900-EL-EEC *et al.*, 2014 Portfolio Status Report (May 15, 2015), Tbl. 2-2.

D. OCC's Suggested Portfolio Adjustments Do Not Offer Any Reasonable Strategy for FirstEnergy to Comply with the Proposed Cost Cap.

Unlike Staff, OCC does not assume that FirstEnergy will simply be able to achieve its savings benchmark at a lower cost than projected. Instead, OCC offers a number of after-the-fact suggestions, which its witness never raised, for program alterations to lower budget costs below the cap. It is notable that this is the first time any party has proposed specific program adjustments to meet the cost cap – well after the completion of an entire collaborative, settlement, and hearing process designed to vet alternative views regarding an appropriate portfolio plan. Regardless of OCC's timing, even a cursory analysis of its proposals shows that they do not provide any reasonable alternative to the Revised Plans.

[5] For example, FirstEnergy's small and large commercial/industrial efficient equipment programs achieved 2015 results on par with their 2014 savings, producing nearly 175,000 MWh of savings, despite ostensibly being suspended in 2015. Case Nos. 16-0941-EL-EEC *et al.*, 2015 Portfolio Status Report (May 12, 2016), at 18, 20; App. G at 5-1.

1. Elimination of the Small Business Audits & Education Sub-Program Would Be Unreasonable and Inconsistent with State Policy.

OCC's primary suggestion is the elimination of the Audits and Education sub-program for small commercial and industrial ("SCI") customers, which is budgeted at $42.8 million. OCC Initial Br. at 19 and Ex. A. It is worth noting that this would have little effect on residential customers' bills, since plan costs are generally allocated by customer class. Tr. I at 163. Regardless, OCC's proposal lacks the necessary analysis to support its reasonableness, and is contrary to state policy in favor of supporting small business in Ohio.

OCC would have FirstEnergy simply strike the SCI Audits & Education subprogram from the portfolio plan, assuming that would have no effect other than eliminating the direct savings projected for that sub-program. However, this is not a freestanding program. It is one component of a larger effort to promote efficiency measures for small businesses, and OCC has provided no analysis of the potential consequences of the elimination of this sub-program for the energy savings potential of the portfolio as a whole.

The Audits & Education subprogram is part of the "C&I Energy Solutions for Business Program – Small." As described in the Revised Plans, "[t]he primary objective of the [Energy Solutions] program is to accelerate the adoption and increase the market share of high efficiency equipment and to increase the efficiency of buildings among commercial and industrial customers by reducing the first cost of high efficiency equipment or building improvements." Joint Ex. 1, Ex. B at 50. The Audits & Education subprogram serves this purpose by providing a way "for a participating customer to receive an energy audit and analytics that focuses on the energy usage of the building and the end use equipment, with the overall goal of installing more efficient end-use equipment . . . ." *Id.* at 53-54. In simpler terms, the purpose of the audit is to show commercial customers their available savings opportunities. After explaining those opportunities, the auditors and utility then provide details on how to take advantage of utility discounts and rebates for measures such as HVAC equipment and lighting incentivized through other subprograms. Hence, this is a subprogram that does not directly deliver savings in the same way as an equipment rebate, but is nevertheless important to achieving savings under the Energy Solutions program as a whole by encouraging customers to take advantage of other SCI subprograms.

OCC's own expert, Mr. Spellman, recognized the importance of this type of educational effort as a vehicle for promoting adoption of efficient technologies:

> Q. Okay. In fact, with regard to education, you believe that education and outreach should be an integral part of an utility-administered EE program, don't you?
>
> A. Yes. And, in fact, I said that in my deposition, and the point I made there that they ought to be an integral part of every plan and that they can be included -- let's say you are doing a commercial and industrial prescriptive -- commercial/industrial prescriptive and custom program and education and outreach would make perfect sense to have that as a component of such a program.

Tr. II at 280. While FirstEnergy categorized SCI Audits & Education as a discrete sub-program, rather than a "component" of the sub-programs providing direct incentives for items such as lighting or HVAC technology, elimination of this "integral" aspect of FirstEnergy's small business programs might well adversely affect the savings they produce.[6] OCC has provided no analysis of the potential magnitude of such effects, leaving the Commission no reasonable basis to assume that this proposed alteration to the Revised Plans will eliminate only the 100,555 MWh of savings directly attributed to the Audits & Education sub-program while leaving

[6] Although OCC criticizes the Audits & Education sub-program as having an acquisition cost of 43 cents per first-year kWh, as a whole, the Energy Solutions program comes in at 17.5 cents per first-year kWh – just above the average portfolio cost of 16.6 cents per first-year kWh. This illustrates one reason that the Commission does not require individual sub-programs to be cost-effective.

untouched the remaining 475,079 MWh of savings (more than a quarter of the Revised Plans' total savings) that FirstEnergy projects its small business programs will produce.

Elimination of the SCI Audits & Education sub-program would also be inconsistent with state and Commission policy that encourages "the education of small business owners in this state regarding the use of, and encourage the use of, energy efficiency programs and alternative energy resources in then businesses." R.C. 4928.02(M). In fact, the Commission cited this statutory policy when it previously approved some of this 2017-2019 funding for small business efficiency programs in FirstEnergy's previous Electric Security Plan case. Case No. 14-1297-EL-SSO, Opinion and Order (Mar. 31, 2016) at 94-95. This policy makes sense since it may be especially difficult for small businesses to dedicate the time and resources to determining what efficiency measures to install on their own, and only underlines the rationale for including the Audits & Education subprogram for this customer segment as part of a balanced portfolio.

2. OCC Misrepresents the Potential Consumer Benefits of Scaling Back Residential HVAC Spending.

OCC also targets the residential HVAC subprogram as a candidate for reduced spending. This subprogram, part of the residential Energy Efficiency Products Program, provides rebates for more efficient heating and cooling equipment such as air conditioners and heat pumps, and smart thermostats that allow customers to manage the heating and cooling of their home efficiently. Joint Ex. 1, Ex. B at 33-36. OCC proposes that FirstEnergy reduce or eliminate spending on this subprogram as a way to cut its budget. OCC Initial Br. at 20. Yet again, this argument is couched in misleading terms and lacks any supporting analysis.

At the heart of the issue, OCC misrepresents this program by focusing on the first-year kWh costs connected to an increase in the budget from the Application to the Revised Plans. FirstEnergy witness Ed Miller explained at the hearing that OCC's calculation that the increased

HVAC program costs in the Revised Plans equates to a $2.48 per first-year kWh cost represents a "mischaracterization." Tr. I at 125:23. As a whole, the HVAC sub-program delivers savings at a first-year kWh cost of 41 cents – "well within the range" for the sub-programs in the Revised Plans. *Id.* at 126:10.

Fundamentally, OCC's critique errs in focusing on the first-year kWh costs to begin with. OCC's approach may be a logical consequence of a cost cap that applies to costs of achieving an annual savings benchmark measured based on first year savings. But as Environmental Intervenors' Initial Brief and Mr. Neme explain, this analysis excludes the consideration of how long a particular efficiency measure will last and the lifetime savings it will deliver. Env. Int. Initial Br. at 12 & n.3; Env. Int. Ex. 1, Neme Rebuttal at 9-10. This flaw is particularly relevant to HVAC measures, which tend to last for a long time. FirstEnergy's residential HVAC sub-program encompasses heating and cooling technologies and thermostats that have measure lives ranging from 10 to 18 years. Joint Ex. 1, Ex. B, App. C-1 at 2. Thus, the HVAC subprogram is an important complement to other residential subprograms involving more short-lived measures, such as the Appliance Turn-In Program, Behavioral subprogram, and Consumer Electronics subprogram, which may cost less per first-year kWh but provide less cost-effective savings over the measure lifetime. *Id.* at 1.

Not only can longer-lived measures be cheaper over the long term, but the Commission has recognized that they offer additional benefits in hedging against the risk of increases in energy prices. In Columbia Gas's recent efficiency case, the Commission endorsed the inclusion of programs that involve measures "that provide long-term energy conservation benefits that may accrue over decades, such as the construction of energy efficient homes, weatherization, and the installation of furnaces and boilers, hot water heaters, and other energy efficient appliances." *In* *re Columbia Gas*, Case Nos. 16-1309-GA-UNC *et al.*, Opinion and Order (Dec. 21, 2016) at 55. The Commission acknowledged that low gas prices might make these measures less cost-effective in the short term, but concluded it to be appropriate to encourage customer installation of long-lasting efficiency measures, noting that they could then "protect the customer when gas and energy prices rise." *Id.*

Any evaluation of whether it makes sense to eliminate spending on measures such as these must take into account this whole picture of their lifetime benefits, consistent with the Commission's directive to consider the "[l]ikely magnitude of *aggregate* energy savings" when designing efficiency programs. Ohio Admin. Code 4901:1-39-03(B)(4) (emphasis added). OCC never mentions these important considerations regarding creation of a balanced and sensible portfolio, instead focusing myopically and unreasonably on the metric of first-year costs per kWh saved.

3. OCC's Other Proposed Plan Revisions Lack Any Supporting Analysis.

In addition to the specific suggestions discussed above, OCC offers two high-level proposals for how FirstEnergy might comply with a cost cap: by encouraging competitive bidding and by scaling back sub-programs that have higher per-kWh costs. OCC Initial Br. at 20-21, Ex. A. Neither of these is accompanied by any technical analysis that would support their reasonableness.

The competitive bidding suggestion amounts to little more than a rhetorical appeal. As a general rule, FirstEnergy reaches out to a number of contractors to find one that can deliver the greatest savings at the lowest costs. Any concerns OCC had in this regard should have been raised during the collaborative process and certainly before the briefing stage of this case.

The three “scenarios” in Exhibit A to OCC’s initial brief offer more detail as to which areas of the Revised Plans OCC imagines could be cut back. These are primarily HVAC and audits and education sub-programs for the various customer segments. OCC Initial Br., Ex. A. For all of the same reasons discussed above, eliminating or reducing such program elements is likely to harm FirstEnergy’s customers in ways that OCC does not confront. These sub-programs offer important benefits both in the short term, through customer education and accompanying natural gas savings, and in the long term, through long-lasting efficiency improvements and development of robust markets for efficient technologies.

III. CONCLUSION

Environmental Intervenors and other parties to the Stipulation worked collaboratively over many months to get FirstEnergy’s Revised Plan to the point where it optimizes customer benefits. The Revised Plans offer customers a balanced portfolio of programs providing real savings for both participants and non-participants. As Environmental Intervenors and FirstEnergy clearly established through expert testimony and briefing, OCC and Staff’s recommendation for a cost cap is poorly conceived and unsupported by meaningful analysis. Environmental Intervenors respectfully request that the Commission approve the Revised Plans as proposed.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Reply Brief* submitted on behalf of the Natural Resources Defense Council, Environmental Law & Policy Center, the Ohio Environmental Council, and the Environmental Defense Fund was served by electronic mail upon the following Parties of Record on March 3, 2017.

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