

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION OF
OHIO POWER COMPANY FOR APPROVAL OF
ITS ENERGY EFFICIENCY AND PEAK
DEMAND REDUCTION PROGRAM
PORTFOLIO PLAN FOR 2017 THROUGH 2020

CASE NO. 16-574-EL-POR

IN THE MATTER OF THE APPLICATION OF
DUKE ENERGY OHIO, INC. FOR APPROVAL
OF ITS 2017-2019 ENERGY EFFICIENCY AND
PEAK DEMAND REDUCTION PROGRAM
PORTFOLIO PLAN

CASE NO. 16-576-EL-POR

IN THE MATTER OF THE APPLICATION OF
THE 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. 16-743-EL-POR

IN THE MATTER OF THE APPLICATION OF
THE DAYTON POWER AND LIGHT COMPANY
FOR APPROVAL OF ITS ENERGY
EFFICIENCY AND PEAK DEMAND
REDUCTION PROGRAM PORTFOLIO PLAN
FOR 2018-2020

CASE NO. 17-1398-EL-POR



COMMENTS OF 2G ENERGY, AIR CONDITIONING, HEATING, AND REFRIGERATION INSTITUTE (AHRI), AMERESCO, INC., BUILDING PERFORMANCE ASSOCIATION (BPA), CAPSTONE TURBINE, COMBINED HEAT AND POWER ALLIANCE, CREE LIGHTING, EATON, ELECTRATHERM, ENERGY MANAGEMENT SOLUTIONS, INC., ENGINUITY POWER SYSTEMS, GEM ENERGY, HEAT IS POWER ASSOCIATION, INGERSOLL RAND, INTEGRAL POWER L.L.C., IRONCLAD ENERGY PARTNERS, JOHNS MANVILLE, MIDWEST COGENERATION ASSOCIATION (MCA), NATIONAL ASSOCIATION OF ENERGY SERVICE COMPANIES (NAESCO), NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION (NEMA), ORMAT TECHNOLOGIES, PRIMARY ENERGY, RECLEIM L.L.C., SCHNEIDER ELECTRIC, AND UPLIGHT

As major employers, businesses, trade associations, service providers, manufacturers, large energy consumers, and companies with investments and interests in Ohio, we appreciate the opportunity to provide these comments in response to the Commission's request for input on the appropriate next steps to take with respect to the funding and continuation of utility energy efficiency programs through the end of 2020.

We understand firsthand how energy policies affect the cost of doing business. All Ohio consumers and businesses benefit when we reduce energy waste – whether or not they participate directly in energy-saving programs. Programs that keep energy costs low and predictable over the long-term are a major consideration for our companies as we make business decisions and investments.

Ohio's utility energy efficiency programs have delivered significant ratepayer benefits. For example:

- From 2009-2017, utility energy efficiency programs generated \$5.1 billion in customer bill savings and delivered cumulative savings of 49 million MWh of electricity.¹
- In 2017, every \$1 spent on energy efficiency programs created \$2.65 in benefits for all Ohio businesses and residents.²
- Energy efficiency is by far the cheapest energy resource in Ohio, with an average cost of \$14 per megawatt hour.³
- Consistency and fairness is important to how these programs operate. Residents and businesses who have paid into program funds should have an equal and fair opportunity to seek rebates and services until a time that is clearly communicated well in advance. Moreover, vendors that provide energy efficiency services should have clarity as to the timeline for program transition so that they can manage contracting risk and workforce challenges.

For all of these reasons, our companies strongly support continued ratepayer funding for and continued operation of existing utility energy efficiency programs through the end of 2020.

¹ Midwest Energy Efficiency Alliance (MEEA), "Energy Efficiency in Ohio: Energy & Bill Savings for Customers, 2009-2017," 2017, http://www.mwalliance.org/sites/default/files/meea-research/2009-2017_ohio_energy_and_bill_savings-meea-final.pdf

² MEEA, "Energy Efficiency: A Good Investment for Ohio," 2017, <http://www.mwalliance.org/sites/default/files/media/Ohio-State-Fact-Sheet.pdf?current=/taxonomy/term/11>

³ Ibid, at 2.

Continued operation and funding of programs will help ensure that investments in cost-effective energy resources are pursued and are not suddenly curtailed and will provide confidence that Ohio is committed to keeping energy costs low through programs that are stable and widely available for all ratepayers.

Sincerely,

2G Energy
Air Conditioning, Heating, and Refrigeration Institute (AHRI)
Ameresco, Inc.
Building Performance Association (BPA)
Capstone Turbine
Combined Heat and Power Alliance
Cree Lighting
Eaton
ElectraTherm
Energy Management Solutions, Inc.
Enginuity Power Systems
GEM Energy
Heat is Power Association
Ingersoll Rand
Integral Power L.L.C.
Ironclad Energy Partners
Johns Manville
Midwest Cogeneration Association (MCA)
National Association of Energy Service Companies (NAESCO)
National Electrical Manufacturers Association (NEMA)
Ormat Technologies
Primary Energy
Reclim L.L.C.
Schneider Electric
Uplight

BICEP Members:

Adobe
Annie's Inc.
Aspen Skiing Company
Autodesk
Aveda
Ben & Jerry's

Burton Snowboards*

Clif Bar & Company*

Dignity Health

eBay Inc.*

Eileen Fisher

Etsy

Fetzer Vineyards

Gap Inc.*

General Mills, Inc.*

Hackensack Meridian
Health

Happy Family Organics

IKEA*

Impossible Foods Inc.

Indigo Ag, Inc.

JLL*

Kaiser Permanente

KB Home

The Kellogg Company*

L Brands*

L'Oreal USA

Levi Strauss & Co.

LinkedIn

Lyft

Mars Incorporated

Microsoft

Nature's Path Foods

Nestle*

New Belgium Brewing

Nike, Inc.

The North Face

Outdoor Industry
Association

Owens Corning*

Patagonia, Inc.

Portland Trail Blazers

Salesforce

Schneider Electric*

Seventh Generation

SFO Airport

Sierra Nevada Brewing

Squaw Valley

Starbucks

Stonyfield Farm

Symantec Corporation

Timberland

Unilever

Vail Resorts

VF Corporation

Vulcan, Inc.

Worthen Industries

November 25, 2019 | Submitted Electronically

Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, Ohio 43215-3793

RE: REQUEST FOR COMMENTS REGARDING THE APPROPRIATE STEPS TO BE TAKEN WITH RESPECT TO ENERGY EFFICIENCY PROGRAMS ONCE THE STATEWIDE CAP OF 17.5 PERCENT, SET BY AM. SUB. HOUSE BILL 6, HAS BEEN MET, PERTAINING TO THE FOLLOWING:

IN THE MATTER OF THE APPLICATION
OF OHIO POWER COMPANY FOR
APPROVAL OF ITS ENERGY EFFICIENCY
AND PEAK DEMAND REDUCTION
PROGRAM PORTFOLIO PLAN FOR 2017
THROUGH 2020

CASE NO. 16-574-EL-POR

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COMPANY FOR APPROVAL OF THEIR
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DEMAND REDUCTION PROGRAM
PORTFOLIO PLANS FOR 2017 THROUGH
2019

CASE NO. 16-743-EL-POR

IN THE MATTER OF THE APPLICATION
OF THE DAYTON POWER AND LIGHT
COMPANY FOR APPROVAL OF ITS
ENERGY EFFICIENCY AND PEAK
DEMAND REDUCTION PROGRAM
PORTFOLIO PLAN FOR 2018-2020

CASE NO. 17-1398-EL-POR

**These businesses are headquartered or have facilities in Ohio.*

Dear Chairman Randazzo and Members of the Public Utilities Commission of Ohio,

I am writing to you on behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network¹—a coalition of 55 major employers and manufacturers across the United States, many of whom have operations and facilities in Ohio. As a representative of the BICEP Network, **I write to express our coalition's support for continued ratepayer funding for and continued operation of existing utility energy efficiency programs through the end of 2020.**

Businesses across Ohio and the nation are increasingly setting goals to cut emissions and reduce energy use. Programs that keep energy costs low and predictable over the long-term are a major consideration for companies as they make business decisions and investments. A 2017 Ceres analysis shows that renewable energy and energy efficiency investments save U.S. companies \$3.7 billion a year, freeing up significant capital that they can reinvest into their employees, research and development, and operations.² Energy efficiency is the most cost-effective energy resource and essential to achieving greenhouse gas reduction goals.

All Ohio consumers and businesses benefit when we reduce energy waste—whether or not they participate directly in energy-saving programs. Ohio's utility energy efficiency programs have delivered significant ratepayer benefits. For example:

- From 2009-2017, utility energy efficiency programs generated \$5.1 billion in customer bill savings and delivered cumulative savings of 49 million MWh of electricity.³
- In 2017, every \$1 spent on energy efficiency programs created \$2.65 in benefits for all Ohioans.⁴
- Energy efficiency is by far the cheapest energy resource in Ohio, with an average cost of \$14 per MWh.⁵
- Consistency and fairness are important to how these programs operate. **Residents and businesses who have paid into program funds should have an equal and fair opportunity to seek rebates and services until a time that is clearly communicated well in advance.** Moreover, vendors that provide energy efficiency services should have clarity as to the timeline for program transition so that they can manage contracting risk and workforce challenges.

For all of these reasons, the BICEP Network strongly supports continued ratepayer funding for and continued operation of existing utility energy efficiency programs through the end of 2020. Continued operation and funding of programs will help ensure that investments in cost-effective energy resources are pursued and are not suddenly curtailed and will provide confidence to the business community that Ohio is committed to keeping energy costs low through programs that are stable and widely available for all ratepayers. Thank you for the opportunity to provide these comments.

Sincerely,



Anne L. Kelly
Vice President Government Relations,
On behalf of Business for Innovative Climate and Energy Policy (BICEP)

¹ The [Ceres BICEP Network](https://www.ceres.org/resources/reports/power-forward-3) comprises influential companies advocating for stronger climate and clean energy policies at the state and federal level in the U.S.

² Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change, <https://www.ceres.org/resources/reports/power-forward-3>

³ Midwest Energy Efficiency Alliance (MEEA), "Energy Efficiency in Ohio: Energy & Bill Savings for Customers, 2009-2017," 2017, http://www.mwalliance.org/sites/default/files/meea-research/2009-2017_ohio_energy_and_bill_savings-meea-final.pdf

⁴ MEEA, "Energy Efficiency: A Good Investment for Ohio," 2017, <http://www.mwalliance.org/sites/default/files/media/Ohio-State-Fact-Sheet.pdf?current=/taxonomy/term/11>

⁵ Ibid, at 2.

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in

Case No(s). 16-0574-EL-POR, 16-0576-EL-POR, 16-0743-EL-POR, 17-1398-EL-POR

Summary: Comments Business comments regarding appropriate steps to be taken with respect to energy efficiency programs once the statewide cap of 17.5 percent, set by Am. Sub. House Bill 6, has been met.

electronically filed by Ms. Mel Mackin on behalf of Ceres and 2G Energy and Air Conditioning, Heating, and Refrigeration Institute (AHRI) and Heat is Power Association and Ameresco, Inc. and Building Performance Association (BPA) and Capstone Turbine and Combined Heat and Power Alliance and Cree Lighting and ElectraTherm and Energy Management Solutions, Inc. and Enginuity Power Systems and GEM Energy and Ingersoll Rand and Integral Power LLC and Ironclad Energy Partners and Johns Manville and Midwest Cogeneration Association (MCA) and National Association of Energy Service Companies (NAESCO) and National Electrical Manufacturers Association (NEMA) and Ormat Technologies and Primary Energy and Recleim LLC and Schneider Electric and Uplight