MARYLAND PUBLIC SERVICE COMMISSION

The EmPOWER Maryland Energy Efficiency Act REPORT OF 2025

With Data for Compliance Year 2024

In compliance with Section 7-211 of
the Public Utilities Article,
Annotated Code of Maryland

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Report Contents

This document constitutes the 2024 annual report of the Maryland Public Service Commission regarding the EmPOWER Maryland Energy Efficiency Act. This Report is submitted in compliance with §7-211 of the Public Utilities Article (PUA), *Annotated Code of Maryland*. PUA §7-211 requires that, on or before May 1 of each year, the Commission, in consultation with the Maryland Energy Administration (MEA), shall report to the General Assembly on the following:

1. the status of programs and services to encourage and promote the efficient use and conservation of energy, including an evaluation of the impacts of the programs and services that are directed to low-income communities, low- to moderate-income communities to the extent possible, and other particular classes of ratepayers;
2. a recommendation for the appropriate funding level to adequately fund these programs and services; and
3. in accordance with subsection (c) of this section, the per capita electricity consumption and the peak demand for the previous calendar year.

In compliance with PUA §7-211, topics addressed in this report include a summary of: the Energy Efficiency & Conservation (EE&C) and Demand Response (DR) program achievements and information regarding forthcoming milestones.

Executive Summary

The Commission reviews the progress of EmPOWER programs on a semi-annual basis, typically in May, to review the results of the third and fourth quarters of the previous year and again in October to review the results of the first and second quarters of the current year. As part of these semi-annual hearings, parties may also request program modifications and budget adjustments. As needed, the Commission also holds *ad hoc* proceedings to address specific EmPOWER elements.

The Commission held a legislative-style hearing on May 7, 2024 to review the semi-annual EmPOWER reports filed by the EmPOWER Maryland Utilities,[1] Washington Gas (WGL), and the Maryland Department of Housing and Community Development (DHCD), with data from the third and fourth quarters of 2023. Following these hearings, on July 2, 2024, the Commission issued Order No. 91214 which addressed program design and evaluation issues as well as future programming. Specifically, the Commission directed the Midstream Work Group to file a status report by October 15, 2024 focusing on a uniform program manual and the plan for its implementation as well as further program enhancements. The Commission also directed the Finance Work Group to file a status report by October 15, 2024 containing the identification of additional data points and reporting metrics requested by OPC on the Clean Energy

[1] The "EmPOWER Maryland Utilities" (electric) are: The Potomac Edison Company (PE); Baltimore Gas and Electric Company (BGE); Delmarva Power & Light Company (DPL); Potomac Electric Power Company (Pepco); and Southern Maryland Electric Cooperative, Inc. (SMECO).

Advantage Pilot Program. The Commission directed the Limited-Income Work Group to file status reports by October 15, 2024 focusing on increasing awareness and opportunities for limited-income customers to replace their appliances as well as a status report focusing on targeted methods for coordination between behavioral programs and DHCD programs. Further, the Commission directed the Evaluation Advisory Group to file a status report by October 15, 2024 focusing on behavior-based programs.

The Commission held its second legislative-style hearing on October 22, 2024 to consider the semi-annual EmPOWER reports filed by the Utilities, WGL, and DHCD for the first and second quarters of 2024. On December 27, 2024, the Commission issued Order No. 91461 which provided direction on programmatic improvements and modifications. Specifically, the Commission directed the Cost Recovery Disclosure Work Group to file a report by April 15, 2025 focusing on CRD messages on social media platforms and the Cost Recovery Work Group to file a status report by April 15, 2025 focusing on the development of a performance incentive mechanism (PIM). The Midstream Work Group was also directed to file a status report by April 15, 2025 focusing on the possibility of including downstream and midstream offerings. The Limited-Income Work Group was directed to file a status report by June 2, 2025 providing an update on utility and DHCD coordination on cross referencing data for behavioral programs and DHCD program combinations. Further, the Order also directed the Future Programming Work Group to file a work plan by April 15, 2025 and a final report by April 15, 2026 focusing on recommendations and improvements for the 2027-2029 program cycle.

Additionally, the Commission implemented HB864 (2024) - Energy Efficiency and Conservation Plans, which was signed into law May 9, 2024. HB864 (2024) made several changes to the operations of EmPOWER including changing goals from energy reduction to greenhouse gas (GHG) reduction, cost recovery, and permitting beneficial electrification programs. Additionally, the legislation required the Commission conduct a work group focused on moderate income programs with a report due July 1, 2025. HB 864 (2024) also required the Commission to determine whether it was in the public interest for mid-sized electric cooperatives to offer programs and services to customers as part of the EmPOWER Maryland Program beginning July 1, 2027. Staff has conducted discussions with Choptank Electric Cooperative regarding this requirement and the Cooperative will be filing its proposed plan by May 1, 2025. The Commission currently has a hearing to discuss the Cooperative's plan scheduled for July 15, 2025. An update on some of these efforts are detailed later within the report.

Initiative Highlights

- Program-to-date, the Utilities' EmPOWER Maryland programs have saved a total of 17,582,578 MWh and 3,589 MW. The expected savings associated with EmPOWER Maryland programs is over $15.8 billion over the life of the installed measures for the EE&C programs.

- Across all Utilities, the lifecycle cost per kWh for the EE&C programs, in 2024, is $0.043 per kWh[2] - significantly lower than the current cost of Standard Offer Service (SOS) which ranges from $0.082 to $0.125 per kWh.

- Program-to-date, the Utilities have spent over $4.6 billion on the EmPOWER Maryland programs, including approximately $3.2 billion on EE&C programs and $1.2 billion on DR programs.

- EmPOWER EE&C programs continue to be cost effective on a statewide basis in 2023, with a statewide Societal Cost Test (SCT) score of 2.21 verified for program year 2023. For every dollar of reported utility or participant cost, the EmPOWER EE&C programs generate approximately $2.21 in benefits.

- Program-to-date, 85,251 limited-income customers participated in EmPOWER Maryland through the Residential Limited-Income Programs. Of the program-to-date participants, 11,966 limited-income households participated in 2024. The average savings per participant in 2024 was 799 kWh. Program-to-date spending on limited-income energy efficiency programs is approximately $299.0 million.

- The average monthly residential surcharge bill impacts[3] for 2023 were as follows:

Table 1: Average Monthly Residential Bill Impacts from EmPOWER Maryland Surcharge in 2024

	EE&C	DR	Dynamic Pricing[4]	Total
BGE	$5.69	$2.75	$0.55	**$8.99**
DPL	$6.31	$2.07	($0.16)	**$8.22**
PE	$6.82	N/A	N/A	**$6.82**
Pepco	$7.42	$4.09	($0.17)	**$11.34**
SMECO	$9.11	$2.34	N/A	**$11.45**

- The reported energy savings for 2024 and program-to-date are as follows:

[2] The lifecycle cost per kWh is calculated by dividing the total EE&C expenditures by the total lifecycle energy savings of the Utilities.

[3] Bill impacts are calculated assuming an average residential monthly usage of 1,000 kilowatt-hours (kWh). The calculated bill impact does not reflect savings produced by EmPOWER Maryland programs through reduced customer usage or energy rate reductions due to reduced system demand.

[4] The difference between rebates paid to participants and revenues received from PJM markets are trued-up in the subsequent calendar year review of the EmPOWER Maryland surcharge. Therefore, the 2021 dynamic pricing bill impacts include trued-up costs associated with the Peak Time Rebate program offered by BGE, DPL, and Pepco in the summer of 2020. The dynamic pricing surcharge for BGE was negative in 2021 (*i.e.*, resulted in a credit) because the PJM Capacity payments received by the utility exceeded the rebate credits paid to customers.

Table 2 EE&C Reported Achievements[5,6]

	2024 Reported Energy Savings (MWh)[7]	2024 Energy Savings as a % of 2016 Retail Sales Baseline	2024 Target Energy Savings %	Program-to-Date Reduction (MWh)[8]
BGE	735,758	32,001,806	2.30%	9,430,019
DPL	87,155	4,205,544	2.07%	1,112,355
PE	145,192	7,412,446	1.96%	4,492,538
Pepco	258,000	14,546,641	1.77%	1,721,964
SMECO	81,044	3,388,854	2.39%	825,702

EmPOWER Maryland Portfolios

For the 2024-2026 program cycle, the Commission directed the Utilities to meet the EmPOWER Maryland goals through a diverse array of cost-effective solutions for Maryland ratepayers which can include EE&C, DR, and advanced metering infrastructure (AMI) or Smart Grid-enabled opportunities.[9] While the EmPOWER Maryland Act mandates that the Commission require each gas and electric utility to establish energy efficiency programs, the directive is limited to those programs that the Commission deems appropriate and across the programs as a whole cost effective. Furthermore, the Commission must consider the impact on rates of each ratepayer class in determining whether to approve an energy efficiency program. Other statutory factors that the Commission must consider in determining whether an energy efficiency program is appropriate include the impact on jobs and on the environment.[10]

In order to verify the Utilities' energy and peak demand savings resulting from individual EE&C and DR programs, the Commission has developed an independent, third-party evaluation, measurement, and verification (EM&V) process for the EmPOWER programs, consistent with national best practices. See the "Evaluation, Measurement & Verification" section herein for further information. Beginning with the 2016 program year, the Utilities were evaluated against

[5] "Reported" savings constitute unverified energy savings and demand reductions based on the Utilities' quarterly programmatic reports. An independent, third-party verification of reported savings is conducted annually.

[6] EmPOWER Maryland 2018 Annual Target was defined in the *2018-2020 Program Cycle EmPOWER Maryland Annual Electric Energy Efficiency Targets* in Order No. 87402 (Sept. 26, 2017) at 11.

[7] Based on preliminary energy savings from semi-annual programmatic reports. These savings will be verified through an EM&V process.

[8] Program-to-date reported reductions include savings contributions from Fast Track Programs, which were Lighting and Appliance Rebate programs that began before the EmPOWER Maryland Law was enacted.

[9] Beginning in 2015, the Commission also directed WGL to implement natural gas energy efficiency and conservation programs. *See* Case No. 9362, *In the Matter of Washington Gas Light Company's Energy Efficiency, Conservation and Demand Response Programs Pursuant to the EmPOWER Maryland Energy Efficiency Act of 2008.*

[10] PUA §7-211(i)(1). In its evaluation of a program or service, the Commission must consider the following four factors: cost effectiveness; impact on rates of each ratepayer class; impact on jobs; and impact on the environment. This citation was updated for the 2025 EmPOWER programs and onward to PUA §7-225(d)(3) - (5) and now also includes impact on emissions reductions.

the post-2015 electric energy efficiency goals established by Order No. 87082[11] which are designed to achieve an annual incremental gross energy savings equivalent to 2.0 percent of the individual utility's weather normalized gross retail sales baseline with a ramp-up rate of 0.20 percent per year. The Maryland General Assembly (MGA) modified the goals for the 2024 - 2026 EmPOWER cycle once in 2022 and again in 2024. The MGA passed the Climate Solutions Now Act (CSNA) in 2022 which maintained the comparison year of 2016 weather normalized gross retail sales based line but modified the annual saving percentages to be 2.0 percent from 2022 - 2024, 2.25 percent for 2025 - 2026, and 2.5 percent for 2027 and thereafter.[12] The MGA once again modified EmPOWER Maryland goals by shifting the energy reduction goals to greenhouse-gas reduction goals after January 1, 2025. The MGA also established gas savings goals for gas companies in EmPOWER based on the gas companies GHG savings from the 2021 - 2023 program cycle.[13] The Commission had the utilities file revised 2025-2026 program plans to ensure compliance with the new goals and after receiving comments and holding a hearing both accepted and revised the utilities program plans for the new goals.[14]

Additionally, in 2023, HB 169[15] was passed which required DHCD to submit a 2024-2026 program cycle plan designed to achieve 0.53 percent of annual gross energy savings in 2024, 0.72 percent in 2025, and 1 percent in 2026. In Order No. 90546, the Commission directed DHCD to submit a 2024-2026 program plan in line with HB 169. The MGA again amended DHCD's program goals in 2024 with HB 864 to be on a trajectory of reducing GHG 0.9 percent relative to a baseline based on 2016 low income sales in the State by 2027 for the years 2025 - 2033.[16]

Energy Efficiency & Conservation Programs

In Order No. 90957, issued on December 29, 2023, the Commission approved plans for the 2024-2026 program cycle. The Utilities' EmPOWER Maryland core EE&C program offerings are similarly designed with standardized customer incentives across the State, albeit with some variation in program implementation based on service territory demographics. Residential EE&C programs include appliances, heating, ventilation, and air conditioning (HVAC) rebates; home energy audits; weatherization; and limited-income programs.[17] Commercial and industrial EE&C programs are designed to encourage businesses to upgrade to more efficient equipment, such as lighting or HVAC retrofits, or to improve overall building performance through weatherization or building shell upgrades. For larger commercial buildings or industrial facilities, a utility can customize its program offerings for cost-effective improvements.

[11] The electric energy efficiency goals are codified in statute for the duration of the 2018-2020 and 2021-2023 program cycles as a result of legislation enacted during the 2017 legislative session. *See* Md. Laws Ch. 014 (2017); PUA §7-211(g).
[12] CSNA of 2022, Chapter 38, 2022, PUA §7–211(g)(2).
[13] Energy Efficiency and Conservation Plans, Chapter 539, 2024, PUA §7–223 (B)(2).
[14] Order No. 91461, Case No. 9705, Dec. 27, 2024, p. 4.
[15] An Act concerning Public Utilities – Energy Efficiency and Conservation Programs – Energy Performance Targets and Low–Income Housing.
[16] Energy Efficiency and Conservation Plans, Chapter 539, 2024, PUA §7–224 (A) and (B).
[17] Other than the volumetric surcharge collected from all ratepayers, limited-income programs are offered at no additional cost for those who qualify.

Baltimore Gas and Electric Company (BGE)

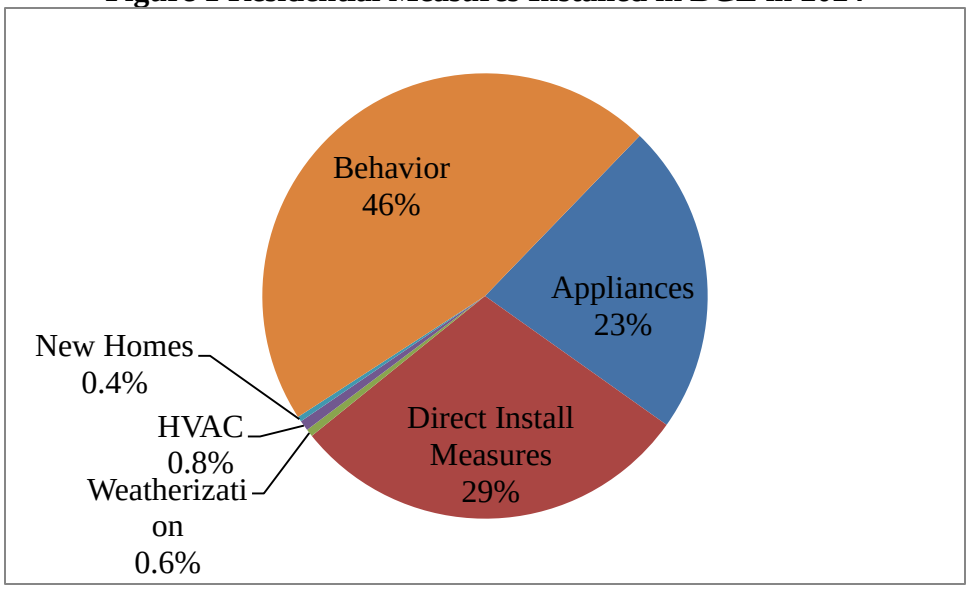
BGE EmPOWER Programs	
Residential Program	**Commercial Programs**
Appliance Rebates	Combined Heat and Power
Appliance Recycling	Commercial Behavior Based
Home Performance with Energy Star	Custom
HVAC	Midstream Products
Quick Home Energy Checkup	Prescriptive
Residential Behavior Based	Retrocommissioning
Residential New Construction	Small Business
Smart Thermostats	
Schools	

BGE realized 114 percent of its 2024 annual energy savings target (or 735,758 MWh) and 115 percent of its forecasted 2024 annual summer demand reduction target (or 600 MW). BGE's programs reached almost 2.4 million participants and installed over 4.2 million measures in homes and businesses in the BGE service territory for almost $225.3 million.

Table 3 BGE Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[18,19]	% of Target Achieved
MWh	735,758	644,812	114%
MW (Summer)	600	523	115%
MW (Winter)	105	N/A	N/A

Figure 1 Residential Measures Installed in BGE in 2024



[18] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

[19] The demand reduction targets and reported achievements include peak demand reductions generated by both EE&C and DR programs, as both components are part of the total portfolio.

Potomac Electric Power Company (Pepco)

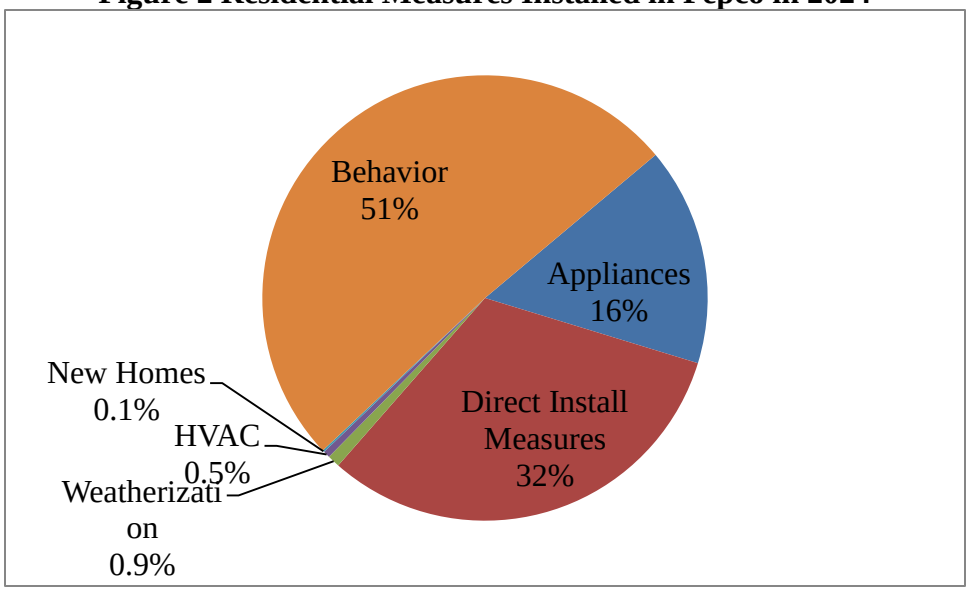
Pepco EmPOWER Programs	
Residential Program	**Commercial Programs**
Appliance Rebates	Combined Heat and Power
Appliance Recycling	Commercial Behavior Based
Behavior Based	Custom
Home Performance with Energy Star	Energy Efficient Communities
HVAC	Midstream Products
Quick Home Energy Checkup	Prescriptive
Residential New Construction	Retrocommissioning
Schools	Small Business
	Virtual Commissioning

Pepco realized 86 percent of its 2024 annual energy savings target (or 258,000 MWh) and 77 percent of its forecasted 2024 annual summer demand reduction target (or 311 MW). Pepco's programs reached over 760,000 participants and installed over 1.5 million measures in homes and businesses in the Pepco service territory for approximately $91.3 million.

Table 4 Pepco Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[20,21]	% of Target Achieved
MWh	258,000	299,767	86%
MW (Summer)	311	404	77%
MW (Winter)	41	N/A	N/A

Figure 2 Residential Measures Installed in Pepco in 2024



[20] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

[21] The demand reduction targets and reported achievements include peak demand reductions generated by both EE&C and DR programs, as both components are part of the total portfolio.

The Potomac Edison Company (PE)

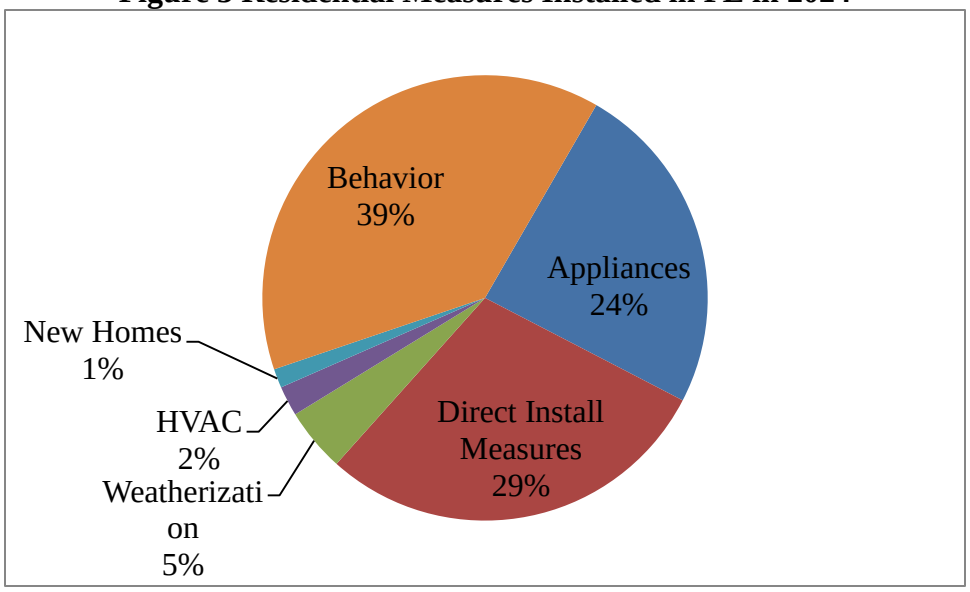
PE EmPOWER Programs	
Residential Program	**Commercial Programs**
Appliance Rebates	Custom
Appliance Recycling	Financing
Behavior Based	Retrocommissioning
Home Energy Improvement	Small Business
HVAC	Prescriptive
Residential New Construction	

PE realized 95 percent of its 2024 annual energy savings target (or 145,192 MWh) and 89 percent of its forecasted 2024 annual summer demand reduction target (or 26 MW). PE's programs reached 187,197 participants and installed 327,783 measures in homes and businesses in the PE service territory for approximately $36.0 million.

Table 5 PE Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[22]	% of Target Achieved
MWh	145,192	153,088	95%
MW (Summer)	26	29	89%
MW (Winter)	10	N/A	N/A

Figure 3 Residential Measures Installed in PE in 2024



[22] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

Delmarva Power & Light Company (DPL)

DPL EmPOWER Programs	
Residential Program	**Commercial Programs**
Appliance Rebates	Combined Heat and Power
Appliance Recycling	Commercial Behavior Based
Behavior Based	Custom
Energy Efficiency Kits	Energy Efficient Communities
Home Performance with Energy Star	Midstream Products
HVAC	Prescriptive
Quick Home Energy Checkup	Retrocommissioning
Residential New Construction	Small Business
Schools	Virtual Commissioning

DPL realized 97 percent of its 2024 annual energy savings target (or 87,155 MWh) and 73 percent of its forecasted 2024 annual summer demand reduction target (or 56 MW). DPL's programs reached over 200,000 participants and installed over 407,000 measures in homes and businesses in the DPL service territory for approximately $32.6 million.

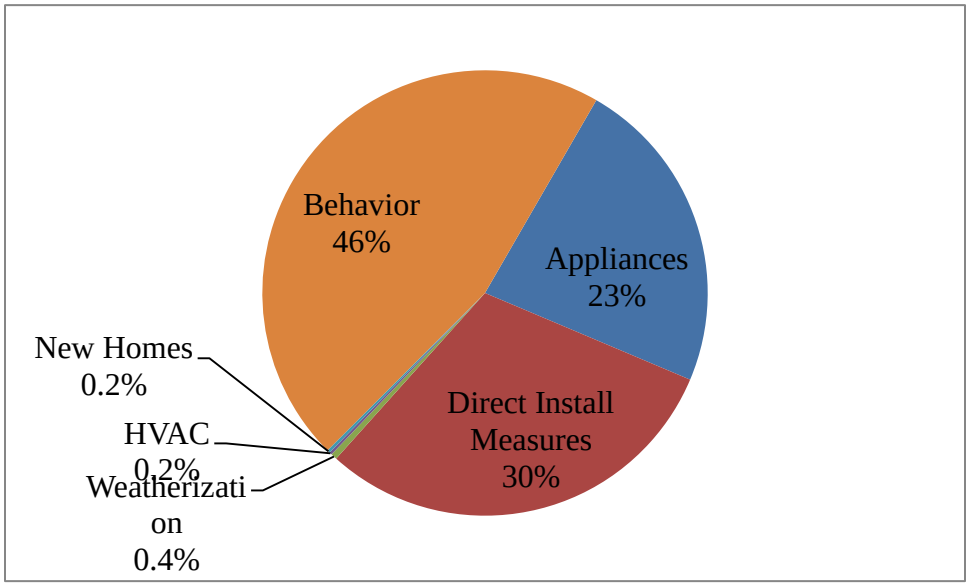
Table 6 DPL Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[23,24]	% of Target Achieved
MWh	87,155	89,452	97%
MW (Summer)	56	78	73%
MW (Winter)	9	N/A	N/A

Figure 4 Residential Measures Installed in DPL in 2024

[23] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

[24] The demand reduction targets and reported achievements include peak demand reductions generated by both EE&C and DR programs, as both components are part of the total portfolio.



Southern Maryland Electric Cooperative, Inc. (SMECO)

SMECO EmPOWER Programs	
Residential Program	**Commercial Programs**
Appliance Rebates	Combined Heat and Power
Appliance Recycling	Custom
Behavior Based	Midstream Products
Energy Efficiency Kits	Prescriptive
Home Energy Improvement	Retrocommissioning
HVAC	Small Business
My Energy Target	
Residential New Construction	
Residential Rewards	
Schools	

SMECO realized 109 percent of its 2024 annual energy savings target (or 81,044 MWh) and 17 percent of its forecasted 2024 annual summer demand reduction target (or 17 MW). SMECO's programs reached over 192,000 participants and installed over 523,000 measures in homes and businesses in the SMECO service territory for approximately $25.9 million.

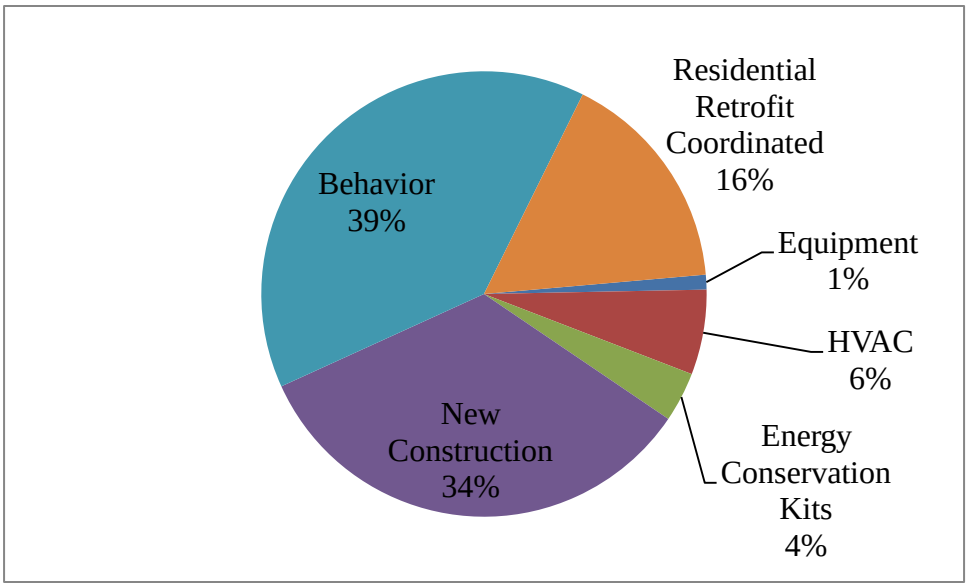
Table 7 SMECO Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[25,26]	% of Target Achieved
MWh	81,044	74,168	109%
MW (Summer)	29	170	17%
MW (Winter)	4	N/A	N/A

[25] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

[26] The demand reduction targets and reported achievements include peak demand reductions generated by both EE&C and DR programs, as both components are part of the total portfolio.

Figure 5 Residential Measures Installed in SMECO in 2024



Washington Gas and Light Company (WGL)

WGL EmPOWER Programs	
Residential Program	**Commercial Programs**
Behavior Based	C&I Prescriptive
Energy Conservation Kits	Custom
Equipment	
HVAC	
Residential New Construction	
Residential Coordinated	

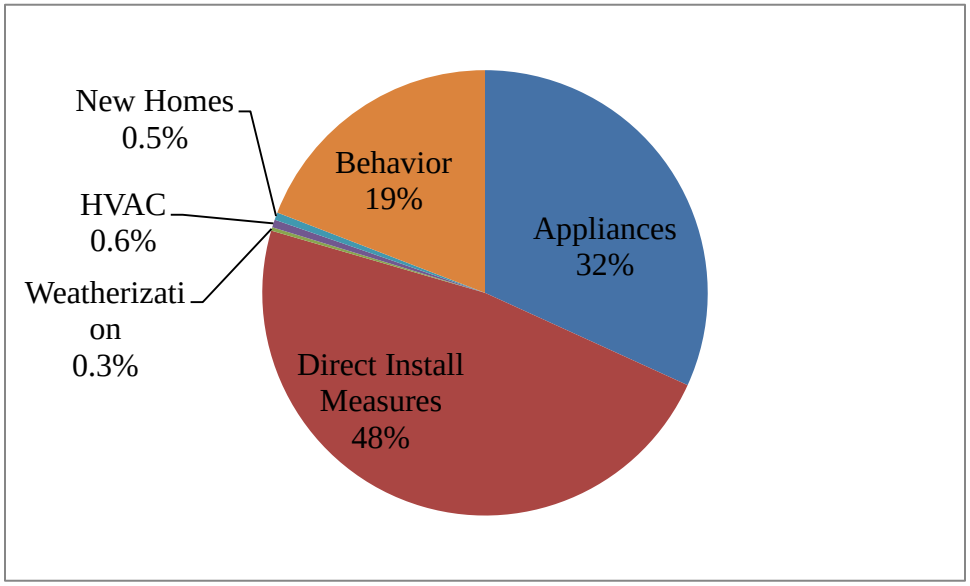
WGL realized 147 percent of its 2024 annual energy savings target (or 2,415,947 Therms). WGL's programs reached over 136,000 participants and installed over 166,000 measures in homes and businesses in the WGL service territory for approximately $15.0 million.

Table 8 WGL Reported Savings vs Targets for 2024

	2024 Reported Savings	2024 Target Savings[27]	% of Target Achieved
Therms	2,415,947	1,640,019	147%

[27] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of each Utility.

Figure 6 Residential Measures Installed in WGL in 2024



Limited-Income Programs

On December 22, 2011, the Commission, in Order No. 84569, designated DHCD as the sole implementer of limited-income programs for the EmPOWER Maryland Utilities. In April 2012, DHCD accepted control of the residential limited-income programs of BGE, PE, and SMECO. In July 2012, the transition was completed with DHCD accepting control of the Pepco and DPL limited-income programs. As discussed previously, the MGA codified DHCD as having EmPOWER programs and goals in 2023 and 2024.

In Order No. 86785, issued on December 23, 2014, the Commission authorized DHCD to continue its implementation of the limited-income programs in Maryland during calendar year 2015, subject to certain specified structural enhancements such as spending guidelines per household. DHCD was approved as the implementer of the limited-income programs for the remainder of the 2015-2017 program cycle in Order No. 86995. In 2023, HB 169 was passed which required DHCD to submit a 2024-2026 program cycle plan designed to achieve 0.53 percent of annual gross energy savings in 2024, 0.72 percent in 2025, and 1 percent in 2026. DHCD had not been required to have a savings goal in previous cycles. In Order No. 90546, the Commission directed DHCD to submit a 2024-2026 program plan in line with HB 169. In Order No. 90957, DHCD's 2024-2026 program cycle plan was approved.[28]

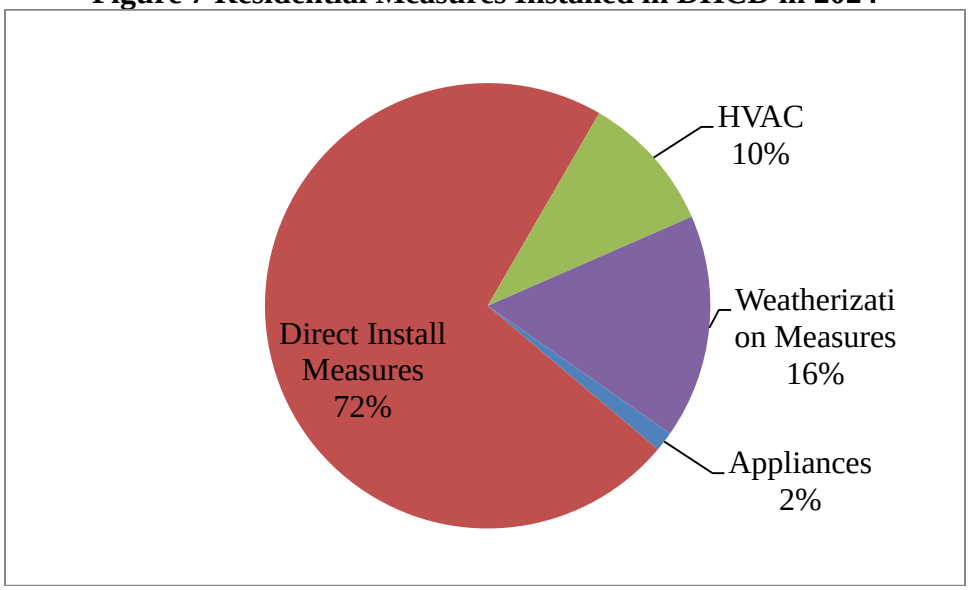
DHCD offers two programs, one for single family homes and another for multifamily properties. In 2023, DHCD weatherized approximately 8,000 limited-income homes and 3,860 multifamily properties at a total cost of $37.8 million. The average savings per participant in 2023 was 799 kWh.

[28] DHCD also partners with WGL to implement limited-income programs in WGL's service territory.

Table 9 DHCD Reported Savings vs Targets for 2024

Program	Energy/Demand Savings	2024 Reported Savings	2024 Target Savings[29]	% of Target Achieved
Single Family	MWh	5,175	16,602	31%
	MW (Summer)	1.208	4.055	30%
	MW (Winter)	0.919	N/A	N/A
Multifamily	MWh	4,391	10,253	43%
	MW (Summer)	0.986	2.489	40%
	MW (Winter)	0.786	N/A	N/A

Figure 7 Residential Measures Installed in DHCD in 2024



Demand Response

The EmPOWER Maryland Act requires the Utilities to implement cost-effective demand response programs, although there are no current goals established for the magnitude of demand reduction that each Utility must target (following the realization of the legislatively-mandated 15 percent by 2015 targets). The Commission approved four residential demand response programs in late 2007 and early 2008,[30] all of which were operational by the end of 2009.[31]

Customers who have chosen to participate in the direct load control (DLC) programs included in the Utilities' demand response portfolios have a switch or thermostat installed at their properties to briefly curtail usage of central air conditioning or an electric heat pump in instances of system reliability issues or high electricity prices during critical peak hours. Each direct load control DR program includes the following common components: (1) customer participation in DR programs is voluntary; (2) upon receiving a customer request, the utility installs either a

[29] EmPOWER Maryland reduction targets are based upon the individual EmPOWER Maryland filings of DHCD.
[30] *See* Commission Letter Order (Nov. 30, 2007).
[31] The Commission did not approve a DR program for PE similar to those implemented for BGE, Pepco, DPL, and SMECO because PE's proposed program was not cost effective due to lower zonal capacity prices.

programmable thermostat or a direct load control switch for a central air conditioning system or for an electric heat pump on a customer's premise; (3) the Utilities provide a one-time installation incentive and annual bill credits to the participants during the specified summer peak months; and (4) with the exception of the SMECO DR program, customers can select one of three cycling choices (50 percent, 75 percent, or 100 percent).[32] Utilities will invoke the cycling process when PJM calls for an emergency event or if the Utilities individually determine that an event is necessary during summer peak season. Table 10 summarizes the incentives offered by the Utilities to the residential program participants.

Table 10 Utilities' Incentive Levels for Residential Demand Response Program Participants

Utility	50% Cycling		75% Cycling		100% Cycling		Bill Credit Months
	Installation Incentive	Annual Bill Credit	Installation Incentive	Annual Bill Credit	Installation Incentive	Annual Bill Credit	
BGE	$50	$50	$75	$75	$100	$100	Jun.–Sept.
Pepco	$40	$40	$60	$60	$80	$80	Jun.– Oct.
DPL	$40	$40	$60	$60	$80	$80	Jun.– Oct.
SMECO	***	$50	***	$75	N/A	N/A	Jun.– Oct.

*** A participant in SMECO's CoolSentry program can keep the installed thermostat at no additional cost following 12 months of program participation; otherwise, the thermostat will be removed if the participant terminates participation less than 12 months after installation.

Table 11 summarizes the number of active devices installed for each of the Utilities' direct load control programs on a program-to-date basis through December 31, 2024.

Table 11 Utilities' Residential Direct Load Program Device Installation

Utility	Residential	Commercial	Total
BGE	374,377	N/A	374,377
DPL	41,034	2,403	43,437
Pepco	239,801	6,136	245,937
SMECO	7,089	0	7,089
Total	**662,301**	**8,539**	**670,840**

Table 12 summarizes the demand reduction capability for the Utilities' DLC programs as of December 31, 2024.

[32] The three cycling choices represent the air conditioner compressor working cycled reduced by 50 percent, 75 percent, and 100 percent under PJM- or utility-invoked emergency events during summer peak season. SMECO only offers a 50 percent and 75 percent cycling level with corresponding bill credits of $50 and $75 during the summer months.

Table 12 DLC Program Coincident Peak Demand Reduction (MW Summer)

Utility	Program-to-Date Reported
BGE	219.204
DPL	40.831
Pepco	247.382
SMECO	61.360
Total	**568.777**

Additional demand reductions are expected to stem from smart grid-enabled dynamic pricing programs, as well as from other non-EmPOWER funded programs such as conservation voltage reduction (CVR). Table 13 summarizes the reported demand reductions from the dynamic pricing programs for 2013-2024. BGE, Pepco, and DPL are currently the only Utilities that operate dynamic pricing programs. Demand reductions from dynamic pricing programs represent a snapshot for a particular time period and are dependent upon customer engagement and participation; therefore, demand reductions attributable to dynamic pricing programs could change year-to-year.

Table 13 Dynamic Pricing Demand Reduction (MW)

Utility	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
BGE	0	209	309	336	330	140	111	110	125	125	125	125
DPL	0	0	143	39	31	47	0	54	64	31	0	0
Pepco	309	125	47	126	135	124	91	55	140	140	0	0
Total	**309**	**334**	**499**	**501**	**496**	**311**	**202**	**219**	**329**	**296**	**125**	**125**

PJM Reliability Pricing Model Capacity Market

Some EmPOWER Maryland programs are eligible to participate in the wholesale energy market through PJM's capacity auctions and can receive payments that are used to offset the costs in the EmPOWER programs and lower the surcharge.

PJM conducted the Base Residual Auction (BRA) for Delivery Years (DY) 2025/2026 in July of 2024 after the auction was postponed in 2022 as the Federal Energy Regulatory Commission (FERC) considered approving new capacity market rules recommended by PJM. In this auction, most of PJM cleared at a price of $269.92 per MW-day which is approximately 10 times higher than the previous capacity price.

The following tables illustrate the cleared capacity and PJM capacity payments for the DLC, EE&C and DP programs. The utilities previously bid DLC as a capacity program and received capacity payments from PJM for these programs. For the 2021/2022 DY and onwards these programs were shifted to Price Responsive Demand resource in PJM which reduces the capacity obligations of the utility and thus reduces the capacity payments customers would otherwise have had to make.

Table 14 Demand Response Program BRA Results

	Cleared Capacity (MW)	PJM Capacity Payment (Million $)
DY 2009/2010	217	$18.80
DY 2010/2011	415	$26.40
DY 2011/2012	662	$26.60
DY 2012/2013	953	$46.50
DY 2013/2014	803	$67.70
DY 2014/2015	772	$33.90
DY 2015/2016	625	$36.00
DY 2016/2017	554	$24.10
DY 2017/2018	536	$23.50
DY 2018/2019	522	$11.50
DY 2019/2020	230	$1.60
DY 2020/2021	265	$9.20
Demand Response Program Bid as Price Responsive Demand		
DY 2021/2022	510	$37.70
DY 2022/2023	230	$10.70
DY 2023/2024	235	$6.10
DY 2024/2025	305	$10.30
DY 2025/2026	224	$30.70
Total	**8058**	**$421.30**

The Utilities also bid capacity reductions from their EE&C programs and AMI-enabled dynamic pricing programs. Similar to the DLC programs, the Utilities earn capacity payments from PJM for these commitments; the payments are used to offset EE&C program costs and to fund the rebates earned by customers in the dynamic pricing program. Table 15 and Table 16 summarize the capacity bid into the PJM capacity market from the EE&C and dynamic pricing programs by delivery year, and the payments the Utilities receive from PJM.

Table 15 EE&C Program BRA Results

	Cleared Capacity (MW)	PJM Capacity Payment (Million $)
DY 2012/2013	168	$8.2
DY 2013/2014	107	$8.7
DY 2014/2015	179	$8.3
DY 2015/2016	175	$10.2
DY 2016/2017	226	$9.5
DY 2017/2018	243	$10.8
DY 2018/2019	172	$10.1
DY 2019/2020	184	$6.8
DY 2020/2021	199	$5.8
DY 2021/2022	180	$11.4
DY 2022/2023	49	$2.0
DY 2023/2024	90	$2.3
DY 2024/2025	103	$2.8
DY 2025/2026	100	$9.7
Total	**2,114**	**$103.2**

Table 16 Dynamic Pricing Program BRA Results

	Cleared Capacity (MW)	PJM Capacity Payment (Million $)
DY 2014/2015	267	$12.2
DY 2015/2016	426	$23.3
DY 2016/2017	461	$20.0
DY 2017/2018	387	$17.0
DY 2018/2019	378	$10.0
DY 2019/2020	225	$2.2
DY 2020/2021	425	$13.1
DY 2021/2022	177	$4.8
DY 2022/2023	186	$2.5
DY 2023/2024	177	$4.3
DY 2024/2025	200	$13.1
DY 2025/2026	185	$24.5
Total	**3,494**	**$147.0**

Table 17 illustrates the amount of capacity cleared in the BRA by the EmPOWER Utilities for the delivery years of 2024/2025 and 2025/2026. The table also shows the amount of capacity revenue that the Utilities can expect to receive from PJM in the two delivery years which will be used to offset the costs of the DR, EE&C, and dynamic pricing programs borne by ratepayers. The amount of capacity cleared in the 2025/2026 DY auctions is 15 MW less than the amount of capacity cleared in the 2024/2025 DY, however, capacity revenue is higher in 2025/2026 because of the increase in the capacity price.

Table 17 Maryland Utilities' PJM BRA Results and Expected Revenue for Delivery Years 2024/2025 and 2025/2026

DY 2024/2025					DY 2025/2026				
Cleared Bids (MW)				Value	Cleared Bids (MW)				Value
DR	DP	EE&C	Total	($Million)	DR	DP	EE&C	Total	($Million)
N/A	200	103	303	$15.9	N/A	185	100	285	$34.2

EmPOWER Maryland Funding Levels

EE&C Program Funding

On December 29, 2023, in Order No. 90957, the Commission approved the 2024-2026 program cycle budgets based on the EmPOWER Maryland Utilities' proposals. Table 18 breaks down the 2024 Commission-approved budgets for each of the Utilities, while Table 19 illustrates the actual 2024 expenditures by the Utilities with respect to their EmPOWER Maryland EE&C programs.

Table 18 Forecasted 2024 EE&C Budgets

Utility	Residential	C&I	DHCD Limited-Income Program	Total
BGE	$107,539,248	$154,069,133	$38,939,359	**$300,547,740**
DPL	$12,822,159	$20,823,887	$0	**$33,646,046**
PE	$24,565,724	$58,265,235	$8,226,306	**$91,057,265**
Pepco	$38,517,530	$66,932,535	$0	**$105,450,065**
SMECO	$21,757,878	$10,390,279	$0	**$32,148,157**
Total	**$205,202,538**	**$310,481,069**	**$47,165,665**	**$562,849,273**

Table 19 Reported 2024 EE&C Spending

Utility	Residential	C&I	DHCD Limited-Income Program	Total
BGE	$70,087,034	$103,883,555	$15,603,257	**$189,573,846**
DPL	$10,607,540	$16,997,273	$0	**$27,604,812**
PE	$13,600,767	$22,316,264	$3,020,810	**$38,937,841**
Pepco	$26,646,870	$43,747,962	$0	**$70,394,832**
SMECO	$15,414,179	$7,398,183	$4,432	**$22,816,794**
Total	**$136,356,389**	**$194,343,237**	**$18,628,499**	**$349,328,126**

Table 20 details the EmPOWER Maryland EE&C program surcharges and revenue requirements for each of the Utilities. The EmPOWER Maryland surcharges are a volumetric-based charge, subject to the individual ratepayer's monthly energy usage. The revenue requirements do not correspond to the filed budgets because some program costs are amortized and collected over a different time periods. In recent years, there have been different

modifications to EmPOWER cost recovery. Historically, costs were collected over a five-year period as directed by the Commission in Order No. 81637.[33] On December 29, 2022, the Commission issued Order No. 90456 that transitioned the recovery of EmPOWER costs to a single year by 2026 and eliminate previously amortized costs by 2030. This process of shortening and then eliminating the amortization of EmPOWER costs over five years started in 2024.[34] On December 29, 2023, the Commission issued Order No. 90957 extending the pay-down of the unamortized balance from five years to seven years. The Utilities filed updated EmPOWER surcharges to comply with the order which went into effect on March 1, 2024. The Commission then made further refinements to the EmPOWER surcharge on June 4, 2024 in Order No. 91175 due to the passage of HB 864, signed into law on May 9, 2024. The order included extending the period by which EmPOWER previously unamortized costs were paid off to 2031 and reducing the return on these unamortized balances to be the utility cost of debt instead of the utilities weighted average cost of capital. The Utilities filed updated EmPOWER surcharges for a second time in 2024 to comply with the changes in the order. These new rates went into effect July 1, 2024. The table below reflects the surcharges and revenue requirements that went into effect July 2024.

Table 20 2024 EE&C Monthly Surcharges (per kWh) and Revenue Requirements

Utility	Residential	Small C&I	Large C&I	Revenue Requirement
BGE	$0.00569	$0.01541	$0.00490	$106,554,028
DPL	$0.00655	$0.00838	$0.00838	$31,567,841
PE	$0.00682	$0.00954	$0.01120	$38,731,171
Pepco	$0.00742	$0.00691	$0.00691	$92,695,739
SMECO	$0.00911	$0.00564	$0.00564	$27,424,269

Table 21 2024 Unamortized Balance

Utility	2024 Unamortized Balance
BGE Electric	$292,653,178
BGE Gas	$43,223,174
DPL	$68,079,103
PE	$108,841,765
Pepco	$183,902,895
SMECO	$44,462,079
WGL	$31,114,511

Demand Response Program Funding

[33] *In the Matter of the Commission's Investigation of Advanced Metering Technical Standards, Demand Side Management (DSM) Cost Effectiveness Tests, DSM Competitive Neutrality, and Recovery of Costs Advanced Meters and DSM Programs*, Case No. 9111.

[34] Order on Cost Recovery and Unamortized Balance Retirement, Order No. 90456, Case No. 9648 (Dec. 29, 2022). The process to shift to an expensing model was subsequently updated in Commission Order No. 90957, Case No. 9705, and its letter orders approving the utility surcharges on February 21, 2024.

The December 29, 2023, Commission Order similarly approved three-year budgets for the demand response programs operated by BGE, DPL, Pepco, and SMECO. Table 22 details the EmPOWER Maryland demand response surcharges and revenue requirements for each of the Utilities operating an approved DR program.[35]

Table 22 2024 Demand Response Monthly Surcharges (per kWh) and Revenue Requirements

Utility	Residential	C&I	Revenue Requirement
BGE	$0.00275	N/A	$32,721,752
DPL	$0.00211	$0.00022	$5,000,096
Pepco	$0.00409	$0.00013	$23,381,591
SMECO	$0.00234	($0.00020)	$5,018,818

Table 23 details the respective forecasted and reported budgets for each of the EmPOWER Utilities operating an approved DR program during 2024. All of the Utilities' programs were under budget for the 2024 program year.

Table 23 2024 Demand Response Forecasted and Reported Budgets

Utility	Forecasted Budget	Reported Costs	Variance
BGE	$52,533,908	$35,607,925	($16,925,983)
DPL	$5,238,273	$4,634,409	($603,864)
Pepco	$21,233,685	$19,021,054	($2,212,631)
SMECO	$5,414,697	$2,039,693	($3,375,004)
Total	**$84,420,563**	**$61,303,081**	**($23,117,482)**

Evaluation, Measurement & Verification

Determining and validating electricity savings and related impacts is a critical component of EE&C and DR programs. The process of evaluation, measurement, and verification (EM&V) of resulting program savings is particularly important in determining: the effectiveness of program delivery; the factors driving or impeding customer participation in programs; characteristics of participants and non-participant customers; determinants of equipment decisions; and customer satisfaction with program delivery. Moreover, the design and depth of program data collection, monitoring, and analyses can impact the accuracy and prudence of compliance results. Given the scale of the EmPOWER Maryland initiative and the potential bill impacts, the Commission is sensitive to the issue of program credibility and transparency. This process also evaluates free-ridership, spillover, cost-effectiveness, deemed savings calculations, etc., pertinent to a thorough and ongoing review of viable and cost-effective energy efficiency and demand response programs.

[35] PE did not operate a separate DR program during 2024 and therefore did not file for a surcharge recovery of DR program costs.

Based on EM&V best practices, the Commission adopted an independent, third-party evaluator model to review the EmPOWER portfolio results.[36] In this model, the Utilities direct primary evaluation and verification activities through an EM&V contractor; subsequently, the Commission's third-party, independent evaluator provides independent analysis and due diligence of the EM&V process. Because this thorough evaluation process requires up to six months following the receipt of program data from the prior calendar year to complete, this report illuminates the results of the Utilities' 2023 program year reported savings.

Overall EM&V Findings of the 2023 EmPOWER EE&C Program

Energy and Peak Demand Savings

In 2023, Guidehouse's evaluation of the first-year savings[37] was 1,026,842 MWh and 223.5 MW which was 96 percent and 108 percent of the Utilities' reported energy and demand savings for that year. For the 2023 program year, Guidehouse estimated an effective net-to-gross (NTG) ratio of 0.64 for annual energy savings and 0.66 for peak demand savings. The NTG ratio is used to derive savings specifically attributable to the EmPOWER programs by calculating free-ridership levels and reducing reported gross savings by that amount.[38] Following the application of the calculated NTG ratios, the net savings for program year 2023 were 440,138 MWh and 74.277 MW.

As the EmPOWER Maryland Independent Evaluator, Loper Energy supports the Commission's oversight of the statewide evaluation of the EmPOWER EE&C programs conducted by Guidehouse. Loper Energy's verification analysis confirmed Guidehouse's results and accepted all of the evaluated energy and demand savings estimates for program year 2023. This important result should increase ratepayer and other stakeholders' confidence that the evaluated savings from the EmPOWER Maryland programs are real and credible.

Given that the key energy assumption values and NTG ratios have been updated and other anomalies in the program tracking databases have been rectified to improve the quality of reporting, it is expected that the Utilities' reported savings estimates for 2024 should continue to be very similar to the evaluation results. Changes to evaluation parameters and codes and standards will have the effect of raising the baseline level of energy savings, therefore reducing the incremental energy savings achieved by installing efficient equipment. The EM&V contractors will monitor and reflect these changes in future evaluation cycles.

Cost Effectiveness

Table 24 presents the 2023 Societal Cost Test (SCT) cost-effectiveness results by sector for each of the Utilities.[39] The sector-level benefit-to-cost ratios reflect the present value of the benefits compared to the present value of the costs, aggregated from each program in the sector-

[36] Order No. 82869 (Aug. 31, 2009).
[37] "First-year savings" is the amount of energy a measure will save in the first year in which the measure is installed.
[38] A "free rider" is a customer who would have installed an energy efficiency measure absent the utility-provided EmPOWER incentive.
[39] The 2024 program year cost-effectiveness results are expected in the second half of 2025.

level sub-portfolio. As noted, SCT ratios greater than 1.0 indicate that the financial benefits that accrue over the life of the measures exceed the financial costs of the program, specifically the costs associated with: utility program administration; the provision of incentives to free riders; and customer outlays for the efficiency measures. Statewide, both the residential and C&I sub-portfolios were cost effective in 2023 with overall SCT scores of 1.82 and 2.57, respectively.

Table 24 2023 Portfolio SCT Results

	Residential	Commercial	Portfolio
BGE	1.88	3.03	2.38
Pepco	1.73	2.06	1.93
PE	2.04	2.22	2.16
DPL	1.15	2.88	2.23
SMECO	1.86	3.07	2.22
Statewide	1.82	2.57	2.21

At the statewide level, the 2023 EmPOWER residential portfolio is expected to generate approximately $1.82 in utility and participant benefits for each dollar of utility and participant cost while the EmPOWER commercial portfolio is expected to generate approximately $2.57 in utility and participant benefits for each dollar of utility and participant cost. For a total investment of $362 million,[40] the state's Utilities, participants, and ratepayers will realize approximately $799 million[41] in financial benefits via electricity, fuel, and water savings generated over the lifetime of the measures installed through the EmPOWER program. These results correspond to a net benefit of approximately $437 million.

When assessing whether to approve the Utilities' plans, the Commission evaluates cost effectiveness at the sub-portfolio level, i.e., the C&I and residential sub-portfolios should both generate SCT ratios greater than 1.0. Thus, individual programs do not necessarily need to be cost effective as long as other programs are sufficiently cost-effective to generate sector-level SCT ratios that are greater than 1.0. The Commission may approve individual programs that are not individually cost effective to ensure a broader array of energy-saving opportunities amongst rate classes, income levels, etc., or because the program may promote innovative technologies and market-transformative practices leading to broader energy savings. All EmPOWER Utilities have developed cost-effective portfolios that pass the SCT test with most by comfortable margins.

2024 Per Capita Electricity Consumption and Peak Demand

Table 25 and Table 26 compare the per capita energy use and peak demand from 2014 to 2024 for all Maryland utilities. In 2024, most of the state's electric utilities experienced an increase in per capita energy use and per capita peak demand as compared to 2023 levels.

[40] The $362 million total investment is the present value of both utility and participant costs.
[41] The $799 million in financial benefits is the present value of both utility and participant benefits.

Table 25 2014 - 2024 Per Capita Energy Consumption

Per Capita Energy Use MWh											
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
BGE	11.86	11.82	11.57	11.31	11.44	11.25	11.17	11.10	11.10	11.02	11.75
Pepco	7.81	7.94	7.73	7.56	7.6	7.45	7.21	7.17	7.00	7.07	6.97
PE	17.64	17.39	17.57	17.6	18.1	17.47	17.04	16.52	16.59	15.98	16.70
Delmarva	12.55	13	12.73	12.65	12.89	12.52	12.1	9.79	10.31	10.28	11.06
SMECO	10.21	10.25	10.03	9.72	9.75	9.96	9.45	9.20	9.67	9.21	9.55
Choptank	12.55	13.04	12.73	13.24	13.42	12.52	12.1	N/A	N/A	N/A	11.06
Hagerstown	7.6	7.62	7.58	7.49	8.27	8.05	7.71	7.91	7.46	7.15	7.61
Easton	16.41	16.55	16.33	16.03	17.12	17.36	15.01	15.63	15.08	14.10	14.66
Thurmont	13.02	13.68	13.06	12.61	13.41	11.94	11.77	11.22	11.29	10.92	12.34
Berlin	9.9	10.61	10.15	9.86	11.06	10.13	10.05	10.21	9.71	9.12	9.57
Williamsport	10.06	10.04	9.64	9.39	9.85	9.65	9.34	9.86	9.96	9.87	9.80
Somerset	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
A&N Coop.	11.06	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 26 2014 - 2024 Per Capita Peak Demand

Per Capita Energy Use kW											
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
BGE	2.27	2.36	2.4	2.34	2.36	2.22	2.3	2.29	2.23	2.22	2.34
Pepco	1.57	1.88	2.03	1.62	1.62	2.73	2.6	2.58	1.58	1.51	1.51
PE	2.62	3.68	3.49	3.42	3.34	3.19	3.39	3.28	3.02	2.96	3.10
Delmarva	2.62	2.76	2.83	2.67	2.64	2.67	2.61	2.11	2.08	2.06	2.19
SMECO	1.93	2.76	2.36	2.41	2.42	2.27	2	1.94	1.98	2.07	2.28
Choptank	2.59	3.33	2.83	2.99	2.98	3.31	3.08	N/A	N/A	N/A	10.42
Hagerstown	1.28	1.66	1.5	1.52	1.55	1.49	1.56	1.52	1.59	1.39	1.50
Easton	3.24	4.27	3.73	3.63	3.63	3.6	3.42	3.42	3.36	3.30	3.42
Thurmont	2.03	4.33	3.26	2.94	3.11	3.44	2.63	2.45	3.15	2.63	3.10
Berlin	2.19	2.3	1.17	2.21	2.27	2.1	2.31	2.25	2.13	2.12	2.27
Williamsport	1.39	2.48	2.15	2.18	2.21	2.52	2.09	1.96	2.42	2.11	2.26
Somerset	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
A&N Coop.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 27 illustrates the per capita electricity usage and peak demand statewide. Generally, statewide per capita energy usage has increased in 2024 compared to previous years.

Table 27 Statewide Per Capita Electricity Usage and Peak Demand 2007-2024

Year	Per Capita Energy Use MWh	Per Capita Energy Use kW
2007	12.38	2.56
2008	11.74	2.49
2009	11.73	2.53
2010	12.02	2.40
2011	11.70	2.50
2012	11.21	2.28
2013	11.13	2.18
2014	10.91	2.07
2015	10.96	2.37
2016	10.74	2.39
2017	10.53	2.21
2018	10.68	2.22
2019	10.49	2.50
2020	10.27	2.49
2021	10.02	2.42
2022	10.01	2.05
2023	9.92	2.02
2024	10.35	2.14

Upcoming Milestones

The Commission will review several Work Group reports as a result of Commission Order Nos. 91214 and 91461.

- Cost Recovery Work Group
    - A status report, filed by April 15, 2025, on its research and analysis of the PIM structure as well as the development of a permanent PIM
- Midstream Work Group
    - A status report, filed by April 15, 2025, on recommendations as to whether there should or should not be downstream and midstream offerings for certain appliances
- Limited Income Work Group
    - A status report, filed by June 2, 2025, providing an update on the utility and DHCD coordination on cross-referencing data for behavioral programs and DHCD program combinations
- Future Programming Work Group

    - A work plan, filed by April 15, 2025, for program improvements for the 2027-2029 cycle
    - A final report, filed by April 15, 2026, with recommendations on program improvements for the 2027-2029 cycle.
- Consider Choptank as part of the larger EmPOWER program
    - HB864 (2024) required the Commission to determine by October 1, 2025 if Choptank should be a part of the larger EmPOWER program or simply have to offer energy efficiency programs.[42] A process has been established to make this determination and Choptank will file a report on this matter by May 1, 2025.[43]
    - The Commission currently has a hearing to discuss the Cooperative's plan scheduled for July 15, 2025.
- Moderate income household work group
    - HB864 (2024) required the Commission to establish a working group to study and make recommendations as to programs specific to moderate income customers for EmPOWER Maryland. The Commission is required to file a report with the general assembly on this work group by July 1, 2025. The working group established by the Commission filed a report with the Commission on April 25, 2025.[44]
- HB864 (2024) required the Commission to establish regulations requiring the promotion of federal and state funds for certain applications within EmPOWER programs.[45] Technical Staff was directed to develop these regulations and in the interim the utilities were directed to include in their August 15, 2024 filings how the requirements of PUA § 7–228 were covered by the utilities 2025-2026 program plans until such time as regulations were finalized by the Commission.[46] On April 1, 2025, Staff filed with the commission a petition for rulemaking to implement proposed regulations. The

[42] PUA §7-222(C).
[43] Order No. 91384, Oct. 22, 2024, Case No. 9705.
[44] Moderate Income Work Group Report, Case No. 9705, Apr. 25, 2025, Maillog No. 318309.
[45] PUA §7–228.
[46] Order No. 91175, Case No. 9705, Jun. 4, 2024, pp. 5 - 6.

Commission established Rulemaking 88 and will hold a rulemaking session on Wednesday, May 21, 2025.[47]

[47] Notice Initiating Rulemaking and Rulemaking Session (RM88), Case No. 9705, Apr. 2, 2025, Maillog No. 317433.