PUBLIC UTILITIES COMMISSION OF OHIO
ENERGY EFFICIENCY WORKSHOPS – 2022

ENERVEE CORP. COMMENTS

Introduction and Enervee Background

Enervee believes there is a strong future for energy efficiency in Ohio. We appreciate the opportunity to provide the Commission with our views about energy efficiency and commend the Commission for facilitating these important discussions.

Enervee orchestrates a nationwide efficient shopping ecosystem, in partnership with utilities and other market actors, to help consumers make better energy-related buying decisions at scale. Our mission is to make it simple and compelling for all consumers to shop energy smart. We achieve this by eliminating persistent and pervasive market, cognitive, psychological, and financial barriers, thereby transforming consumer product markets at scale. We currently partner with 17 leading utilities across 16 states (including Ohio), which collectively serve 23% of all residential electric customer accounts in the United States, as well as 5.7 million customers of gas-only utilities, and also operate in Canada.

Questions and Answers

Q1. It is the policy of this state for electric service to "protect at-risk populations." R.C. 4928.02(L). It is also the policy of this state to encourage innovation and market access for cost-effective demand-side retail electric service including demand-side management programs. R.C. 4928.02(D). In light of the termination of the mandated energy efficiency programs under R.C.4928.66, should electric distribution utilities (EDUs) implement energy efficiency programs? Should some or all programs be targeted to the elderly and low-income customers?

Ohio's EDUs should offer energy efficiency programs to their customers. They are well positioned to both identify the needs of their customers and market programs that can help customers lower their energy usage and save money on their utility bills—and customers trust their utility to provide them with unbiased advice on energy efficiency.

In the past ten years, Ohio's energy efficiency programs have resulted in more than $7.1 billion in savings for consumers, with $2.65 of savings for every dollar spent.[1] A recent report projects that Ohio consumers could save another $2 to $5 billion over 10 years if they can reduce energy waste by 1-2% per year.[2] In the absence of utility-run energy efficiency programs, it is unlikely that this level of savings will be achieved.

Allowing utilities to offer energy efficiency programs is consistent with Ohio state policy. As the Commission has noted, R.C. 4928.02(D) says that it is state policy to "encourage innovation and market access for cost-effective supply- and demand-side retail electric service." Allowing utilities to once again offer energy efficiency programs to consumers is an ideal way to encourage innovation. An online marketplace, for example, is an innovative, market-based

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[1] *See* https://www.dispatch.com/story/business/2020/10/13/nuclear-bailout-bill-brings-aep-ohio-efficiency-programs-end/5893296002/

[2] *See* https://energynews.us/2021/03/23/ohio-on-track-to-waste-billions-of-dollars-on-energy-over-next-decade-study-says/

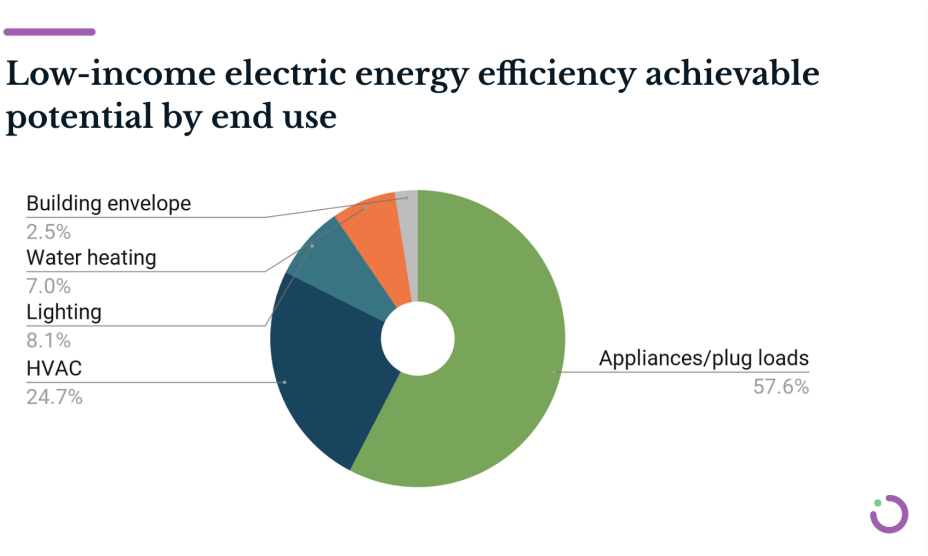
option that allows customers to identify and purchase the most energy efficient products that meet their needs, without rebates. There is plentiful research showing that consumers think it is important to purchase energy efficient products and take action to reign in greenhouse gas emissions.

Allowing Ohio's EDUs to offer energy efficiency programs is also consistent with other Ohio laws. R.C. 4905.22, for example, requires all charges paid by utility customers to be "just and reasonable." When customers participate in energy efficiency programs, they lower their energy usage and lower their bills, thus making usage-based utility charges more just and more reasonable. R.C. 4928.02(A) similarly provides that it is state policy to "ensure the availability to consumers of adequate, safe, efficient, nondiscriminatory, and reasonably priced retail electric service." Again, when customers are more energy efficient, their retail electric service is more reasonably priced, not the least because saving energy avoids many costs, including the cost of generating, transmitting, and distributing energy, ensuring that peak demand can be met, and avoiding greenhouse gas emissions.

Energy efficiency is also an important tool for protecting at-risk populations. The energy burden for low- and middle-income (LMI) customers is substantial—a higher percentage of their income is devoted to utility costs. Thus, energy efficiency programs should be designed in a way that increases participation by customers who need it most and minimizes free ridership by those who don't. Suitable energy efficiency programs should be offered to all customers; programs for the general population should be limited to market-based approaches without subsidies, while financial support should be reserved for those who face significant financial barriers. Thus, there should be earmarked budgets allocated to address LMI customer needs within the context of

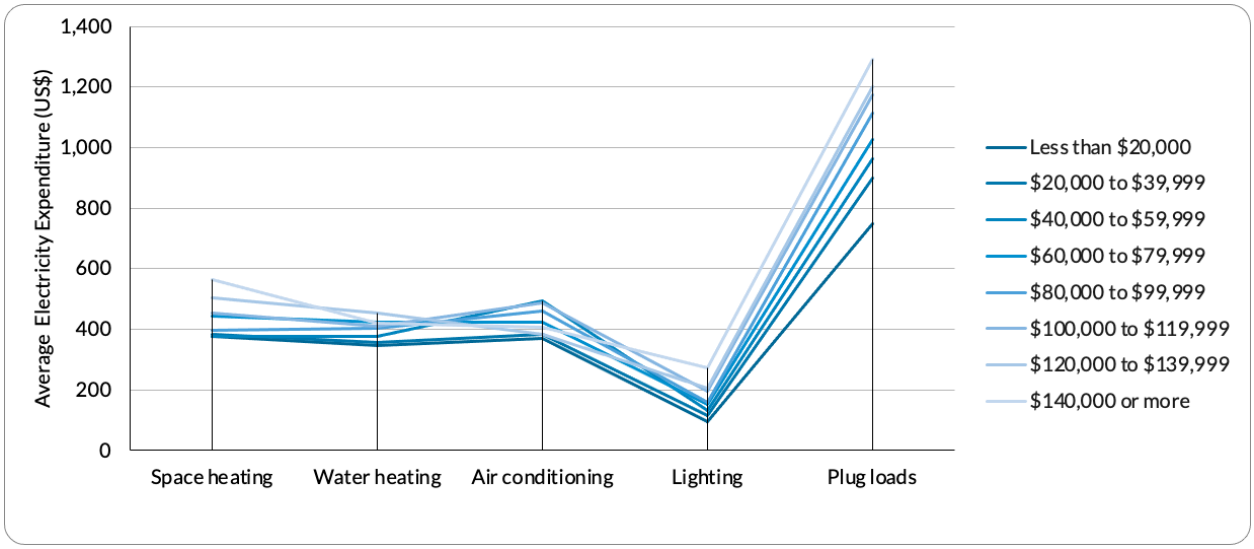
market-based energy efficiency programs. This could include marketing that is targeted to at-risk communities, and traditional weatherization programs. But it should not be limited to these options.

According to a recent study, the number one opportunity for energy savings for low-income customers is through appliances and other plug-loads—not through heating and cooling, as is sometimes believed (see chart):[3]



While these data are taken from a potential and goals study for the low-income segment in California, data from the Energy Information Administration's 2015 RECS survey show that appliances and other plug-in devices collectively are the largest driver of total electricity bills for all income brackets nationwide (see chart below).[4]

[3] *See* https://www.enervee.com/blog/unsung-heroes-of-decarbonization-people-and-plug-loads
[4] *Source: Residential Energy Consumption Survey (2015) , Tables CE5.7a and CE5.7b*



Thus, it is critical that utility energy efficiency programs include opportunities for LMI customers to obtain safe and affordable financing for retail energy efficient product purchases. A critical barrier preventing many customers from making efficient choices is the upfront cost of an appliance or other efficient product. Even with rebates, the cost of an efficient product can be prohibitive for some customers (see response to final question for a specific example). Financing would allow a customer to buy an efficient appliance with no down payment and fixed and affordable monthly payments, all the while saving money through lower energy usage. This type of innovative offering is a market-based solution that can help bring energy efficiency to all customers, who might otherwise be stuck with outdated and inefficient homes, driving up their already high energy bills—and dedicated LMI budgets can augment such programs to make them more inclusive, for example, by providing loan guarantees or interest-rate buy-downs for income-qualified customers. Experiments with such structures exist today in states like California and New York.

Q2. Should EDUs offer energy efficiency programs to all residential customers? How should these programs be funded? Or, in order to promote competition, customer choice, and access to energy efficiency programs, should the EDUs implement cost-effective energy efficiency programs only for their residential standard service offer (SSO) customers, paid for through a bypassable rider? Why?

Yes, EDUs should offer energy efficiency programs to all residential customers, including both SSO customers and customers who choose to shop with a competitive retail electric service (CRES) provider. This is important for several reasons.

First, if programs were offered to SSO customers only and charged through a bypassable rider, many customers would be left out. According to the Commission's most recent data, more than 63% of residential customers in Ohio shop with a CRES provider, and more than 72% of commercial and industrial customers shop.[5] If programs were offered to SSO customers only, more than 2.8 million Ohio utility customers would be ineligible.[6]

Second, it would be inequitable to charge only SSO customers for energy efficiency programs. This is because energy efficiency programs benefit all customers, regardless of who participates. These system-wide benefits can include lower energy prices for all (price suppression estimated at 5.7% by the Commission's Staff[7]); reduced greenhouse gas emissions; deferring the need for new power plants as demand is lowered; and reduced strain on the distribution system, thus deferring upgrades and lowering distribution charges for all.

Third, while CRES providers might be able to offer some energy efficiency options to consumers (for example, smart thermostats), they are unlikely to achieve the scope of utility-run programs. EDUs have unique access to customer marketing opportunities. Further, CRES

[5] *See* https://puco.ohio.gov/wps/portal/gov/puco/utilities/electricity/resources/ohio-customer-choice-activity (Electric Choice Activity, Nov. 2021).
[6] *Id.*
[7] *See* PUCO Letter to Energy Mandate Study Committee, Feb. 26, 2015.

providers might not have an incentive to invest in long-term energy efficiency solutions for customers. A customer might only be with a particular provider for a short period of time—shorter than the many-years lifetime of an efficient product. CRES providers and others should be a complement to, and not a replacement for, utility-run energy efficiency programs.

Regarding how programs should be funded, the Commission should adopt a flexible approach. Programs could be funded through a utility's base distribution rates, through riders on ratepayers' utility bills, or a combination of the two, with potential offsets to charges based on PJM capacity revenues or other revenue sources. Charges through base rates have the advantage of being a known quantity for a period of years between rate cases, thus allowing utilities to effectively plan programs over a longer horizon. Charges through riders have the advantage of being more flexible; the utility can work with Commission Staff and other stakeholders to adjust annual budgets to meet current program needs, including the flexibility to add new programs and pilots. This would encourage innovation for the benefit of customers.

Further, funding for utility energy efficiency programs can be used more effectively if energy efficiency is offered, at least in some instances, at a statewide level, rather than utility-by-utility. There are obvious advantages to statewide programs, including achieving economies of scale, unified statewide marketing opportunities, and the ability to reach LMI and other at-risk customers in a more targeted, comprehensive way.

Ohio could consider, for example, a statewide marketplace model, available for utilities to participate in on a voluntary basis. The platform can support stacked incentives, which can be applied to each purchase transaction, based on a variety of rules, such as geography, customer characteristics or product categories and features. And even with a statewide approach, each

utility could have a branded and tailored experience for their customers, thus allowing customers to benefit from their utility's experience and name recognition, and utilities to benefit from continued engagement with their customers. An energy provider might support marketing and/or provide incentives and the resulting energy impacts can be allocated accordingly. A single platform can drive efficient purchases of both natural gas and electric products. This approach has been proven to work in other jurisdictions.

Q3. Rather than promoting contemporaneous energy efficiency products/services through utilities and certified competitive energy/natural gas suppliers, should utilities offer programs only when private sector providers (not limited to competitive retail electric service (CRES) and competitive retail natural gas (CRNG) providers) fail to effectively deliver such products/services to the market?

The Commission should encourage utilities to offer energy efficiency programs to their customers, even if CRES and CRNGS providers and others are offering energy efficient products and services. Customers should have as many options as possible to be energy efficient. If utilities and others operate in the market for energy efficient products and services, they will each have an incentive to provide better and more innovative options for consumers.

Q4. How should program magnitude be determined?

The Commission should encourage utilities to pursue all cost-effective energy efficiency for the benefit of customers. As has often been said, the cheapest kWh is the one that never gets used. Utilities should work with Commission Staff and other stakeholders to determine the appropriate magnitude of their individual programs, taking into account factors like utility resources, availability of innovative programs, achievable potential, and the ability to reach LMI customers, among other relevant factors.

The Commission should approve concrete performance metrics, such as annual and lifetime kWh save, peak demand reduction, customer participation rates, LMI participation rates, and greenhouse gas reductions for each utility. To encourage utilities to pursue and achieve all cost-effective energy efficiency, there should be performance incentives for exceeding the targeted metrics with cost-effective programs. Such incentives could include a "shared savings" model, as was previously used in Ohio (and continues to be used for some natural gas energy efficiency programs). But other incentives might be appropriate with respect to metrics that aren't tied exclusively to energy benefits. For example, an alternative form of incentive might be appropriate where the utility offers innovative programs that break down barriers and increase the number of LMI customers able to participate in energy efficiency.

Further, as discussed above, there are opportunities for Ohio to implement statewide programs. In considering the appropriate magnitude of programs, the Commission should endorse this type of approach because it allows energy efficiency programs to reach more customers at a lower cost, while also breaking down other barriers to participation (see discussion herein about financing).

Finally, to ensure that all cost-effective energy efficiency is being pursued, and that innovative program designs are being tested, the utilities should be required to conduct solicitations for third-party program proposals for a substantial part of their energy efficiency portfolios.

Q5. State policy for electric service encourages the education of small business owners in the use of energy efficiency programs. R.C. 4928.02(M). Should EDUs offer energy efficiency programs to all small commercial customers, paid for by a nonbypassable rider with the option of an opt-out for those customers? Should EDUs offer energy efficiency programs only for small commercial SSO customers, paid for through a bypassable rider? For each EDU, which rate classes should be considered small commercial customers? How should small business customers be educated regarding energy efficiency programs?

For all the same reasons discussed herein with respect to residential customers, EDUs should offer energy efficiency programs to all small commercial customers, paid for by a non-bypassable rider.

Q6. Are CRES providers prepared to meet demand for energy efficiency programs in the competitive market? Would the sale of energy efficiency measures be subject to the Consumer Sales Practices Act?

Enervee has no comment at this time.

Q7. For electric energy efficiency programs, are there obstacles to bidding residential and small commercial SSO customers' energy efficiency savings into the PJM capacity market? Would the amount of revenue be de minimus? Given the absence of shared savings or administrative fees paid to EDUs, should the PUCO revisit the existing 80/20 sharing of capacity revenue?

Enervee has no comment at this time.

Q8. How should the PUCO measure success in transitioning from mandated energy efficiency programs to a market-based paradigm? Is it sufficient to measure year-over-year change in the amount of energy efficiency from Ohio that clears the PJM capacity market? What, if any, cost-effectiveness test should be used? What, if any, limitations should there be on which energy efficiency programs may be offered?

For purposes of responding to this question, we assume that a "market-based paradigm" for energy efficiency could include a combination of voluntary utility energy efficiency programs (which we support, as discussed herein), programs offered by retail electric and natural gas suppliers, and programs offered by other market actors.

Future utility-run energy efficiency programs should be evaluated based on both quantitative and qualitative factors. Quantitative factors should include annual and lifetime energy reductions (MWh), peak demand reductions (MW), cost effectiveness (under the PACT, as discussed below), carbon reductions and other environmental benefits, total number of customers participating, and number of LMI customers participating. The Commission should set annual targets for these (and potentially other) metrics and provide incentives for utilities to meet and exceed these targets.

It is important not to rely exclusively on a single metric (amount of energy efficiency clearing the PJM capacity market or otherwise) because overreliance on one metric could lead to inequitable results. For example, if the sole focus is on total MWh saved, utilities might have an incentive to chase higher savings from a small number of customers, rather than encouraging all customers to save. If the sole focus is on cost-effectiveness, utilities might have an incentive to forego opportunities that are highly valuable and cost-effective, but which might be slightly less cost-effective than other options. If the sole focus is on clearing the PJM capacity market, the Commission could be ignoring many benefits of energy efficiency at the state and local level, like the deferral of distribution investments discussed above.

Qualitatively, the Commission should also focus on and encourage utilities to pursue new and innovative opportunities. Traditional energy efficiency programs might continue to provide opportunities for customers to save. But the time has come to move beyond simple rebate-based programs that might be less effective at driving new customer savings cost-effectively. The Commission should require utilities to conduct third-party solicitations for innovative programs for a specified share of their energy efficiency portfolios. And utilities should have the flexibility

to add new programs and pilots at any time so that they are not missing out on opportunities as they arise.

When assessing the cost-effectiveness of utility energy efficiency programs, the Commission has used both the Total Resource Cost (TRC) Test and Program Administrator Cost Test (PACT). (The PACT is also called the Utility Cost Test or UCT.) The TRC test was generally used as a threshold test for evaluating overall cost-effectiveness of a utility's portfolio and programs, though utilities did have some flexibility to use the PACT where appropriate.[8] The PACT was used to calculate the net benefits to customers for purposes of calculating the utility's shared savings.[9]

Going forward, the Commission should adopt the PACT as its primary cost-effectiveness test. The PACT is more appropriate than the TRC because it focuses on a comparison between the costs incurred by the utility (program administrator) and the benefits derived from the utility's programs. The TRC test, in contrast, also considers the incremental costs that customers pay out of pocket for energy efficient products. From the Commission's perspective, the customer's out-of-pocket costs should not be a factor, for two primary reasons:

- Asymmetry. While it is relatively straightforward to quantify participant costs in the TRC, many customer benefits are ignored, as they are intangible or difficult to quantify. There are many reasons that customers spend their own money on energy efficient products, including reasons that go beyond mere energy savings.
- Penalizes private investment, leading to programs that rely on subsidies, rather than encouraging market-based approaches that seek to leverage private investment into energy efficient products.

[8] *See* O.A.C. 4901:1-39-04(B) (requiring electric utilities to demonstrate that their portfolio would pass the TRC test and generally applying the TRC test to individual programs but allowing the utility to use other tests as appropriate for individual programs).
[9] *See, e.g., In re Application of [AEP Ohio] for Approval of its Program Portfolio Plan*, Case No. 11-5568-EL-POR, Opinion & Order (Mar. 21, 2012).

The Commission's focus, when it comes to costs, should be what the programs cost and how much they save, which is the focus of the PACT.

Q9. Should the existing demand-side management programs implemented by the natural gas utilities be transitioned to the market-based paradigm where they offer efficiency programs only to nonshopping customers (except for at-risk populations)? R.C. 4929.03(A)(3). Are there differences in the electric and natural gas industries that would prevent competitive retail natural gas suppliers from meeting the demand for efficiency programs in a competitive market?

The Commission should continue to endorse and approve natural gas utility energy efficiency programs. Energy efficiency offered by retail suppliers should complement, not replace, utility-run programs. For all the same reasons described above regarding EDUs, the Commission should not rely exclusively on CRNGS providers or others to offer natural gas energy efficiency to customers. Currently, neither CRES nor CRNGS providers alone can meet the demand for efficient products in a competitive market. As just one example, Duke Energy Ohio does not currently offer demand side management programs for its natural gas customers and has not done so for several years. Despite this, there has not been a robust development of CRNGS-provider-offered programs for Cincinnati-area customers. Without utility-run programs, customers could be left with no energy efficiency programs at all.

Going forward, however, natural gas utility energy efficiency programs should evolve from ratepayer-funded rebates to focusing on removing barriers that customers face in purchasing energy efficient natural gas products, as gas products will be with us for the foreseeable future. This should include market-based approaches, including financing, so that consumers can make informed choices on their own. (See our response to question 14 below for further discussion on this topic.) As one example, on the marketplace for natural gas utility SoCalGas, there were approximately as many *non-rebated* clothes washer purchases as *rebated*

natural gas dryer purchases with financing, showing that the availability of financing is more effective at eliminating the upfront purchase price barrier than a rebate. This market-based approach can also use zero-interest financing to reach more low- and middle-income customers–customers who are traditionally underserved by rebate programs.

Q10. What should the application mechanism and process be for a company to pursue the offering of an energy efficiency program?

The Commission should maintain a flexible approach to approval of utility energy efficiency programs. Utilities should be allowed to pursue energy efficiency programs through (i) base rate cases, (ii) electric security plan cases, (iii) alternative regulation plan cases, (iv) standalone energy efficiency portfolio cases (brought under R.C. 4905.70 or otherwise), (v) annual rider update cases, or (vi) any other type of case allowed by current or future Ohio laws and regulations. The Commission could also approve utility energy efficiency programs, and particularly statewide programs (as discussed above) through a single proceeding involving all utilities.

Further, to support the development of innovative programs, and regardless of the precise application mechanism, the Commission should approve annual budgets for utilities to test and evaluate such third-party pilot programs. This will give utilities the flexibility they need to adapt to the changing market for energy efficiency and to offer their customers the best and newest opportunities to be energy efficient. Utilities should have discretion to identify and implement such third-party pilot programs in consultation with Commission Staff and other stakeholders, without the need for formal Commission approval (beyond approval of the annual budget).

Q11. What is the impact of FERC Order 2222 in designing energy efficiency or demand response programs in Ohio?

Enervee has no comment at this time.

Q12. How has the COVID-19 pandemic affected energy efficiency programs for 2020-2021 offerings, and how might the pandemic have changed the nature of energy efficiency products and services going forward?

The pandemic, and the need for social distancing in particular, has made some types of traditional energy efficiency programs more challenging. Residential customers can be hesitant to participate in programs that require contractors or others inside their homes for long periods of time, even if safety precautions (masks, social distancing, etc.) are taken. Not surprisingly, therefore, the trend towards online shopping accelerated as a result of the pandemic. Going forward, it will be important for consumers to have more options to be energy efficient on their own, particularly in the context of natural replacement cycles.

Behavioral energy efficiency programs offer customers an opportunity to be energy efficient without utility rebates and without close contact with others. This could include traditional home energy report type programs, which have achieved meaningful savings in Ohio. But it should also include other more innovative options that address buying behavior. Every inefficient purchase locks in unnecessary greenhouse gas emissions over the lifetime of the products—over 10 years on average—a lost opportunity that we can no longer afford.

Utility online marketplaces have thrived under the pandemic, capitalizing on the rapid growth of online shopping.[10] Even after the pandemic, the online retail channel is expected to grow and must be a core component of any cost-effective energy efficiency portfolio.

[10] See, for example, the SECC webinar "Value of Online Marketplaces in the COVID Era" on Vimeo https://vimeo.com/463152807

Q13. What role, if any, should considerations such as artificial intelligence, data sharing, and privacy play in Ohio energy efficiency programs?

It is critical to ensure robust protection of customers' personally identifiable information (PII), but this is not an excuse to restrict data sharing between utilities and energy efficiency program implementers.

Q14. What creative solutions have other jurisdictions and entities employed in the implementation of energy efficiency programs to accomplish objectives such as cost-effectiveness, customer education, benefits to at-risk populations, robust program adoption, and measured energy savings?

An energy efficiency marketplace model has been implemented throughout the country and internationally as an innovative way to empower customers to make energy efficient choices on their own, with or without utility rebates. There is a growing body of evidence that it is possible to eliminate longstanding market, cognitive and psychological barriers—and make markets work better for consumers. Independent evaluations have shown that Enervee's marketplace deployments have delivered on the objectives highlighted in this question, namely cost-effectiveness (the large share of market-based savings achieved without rebates led to favorable overall cost metrics, while delivering energy and non-energy benefits), robust program adoption and measured energy savings.

One way to overcome these barriers is through financing, which can be provided directly to consumers through a utility marketplace, as is being done by SoCalGas and TVA. Financing converts one lump sum upfront payment into affordable monthly payments; a $1,000 appliance can be paid off in monthly installments of roughly $25.

The energy efficiency marketplace model is a pioneering market-based effort to increase the sales share of clean and efficient consumer products in an equitable way, in full alignment with the new Long Term Strategy of the United States, Pathways to Net-Zero Greenhouse Gas Emissions by 2050, which states: "The priority in this decade is to rapidly improve energy efficiency and increase the sales share of clean and efficient electric appliances...while also improving the affordability of energy and the equitable access to efficient appliances..."

Beyond making financing available to customers on terms more favorable than credit cards or buy-now-pay-later offers (no hard credit inquiry, lower APRs, fixed monthly payments, 60-month loan term with no penalty for early repayment), energy efficiency funding could be used to share risk (loan loss reserve) and/or buy down interest rates for underserved borrowers and disadvantaged communities to make financing more inclusive. This is being done in other jurisdictions, such as California and New York.

Traditional energy efficiency programs typically attempt to meet the needs of low-income customers through free measures. These programs are often not cost-effective because the entire cost of the measure is incurred as a program cost. And low-income programs like whole-home weatherization, while helpful in providing long-term benefits and improving housing stock, have high costs per customer served, thus making it difficult to reach a broad customer base.

Income-qualified customers are willing to pay for energy-saving products, in exchange for greater choice and convenience. Rather than relying on bill subsidies or traditional energy efficiency programs under which a limited range of products is installed for free in people's homes, with little choice, an online retail low-income program can give customers the opportunity to select and purchase appliances online, with instant discounts provided by the

utility. Third party providers like Enervee can negotiate special pricing with manufacturers on products intended for income-eligible customers, capitalizing on their own commitments to better serve the low- income segment (such as the Nest Power Project).

With the support of energy efficiency program dollars, financing could also leverage private investment by income-qualified customers for larger appliance purchases. This chart assumes that energy efficiency funding is available to buy down interest rates to zero for income-qualified customers. Buying down interest rates would drive over three times more efficient appliances than a traditional no-cost direct install program with the same program budget—and customers would be able to choose their appliance.

Refrigerator Example	Free Direct-Install	Zero-Interest Financing
Purchase price	$1000	$1000
Installation cost	Included	Included
Incentive amount	$1000	$315
Private investment leveraged	none	$1000

While traditional energy efficiency rebates (or EE rebates combined with demand response incentives) can be large enough to empower income qualified customers to buy small, inexpensive devices like thermostats, rebates at a level that would be cost-effective are insufficient to overcome the upfront purchase price barrier associated with major domestic appliance purchases, such as

	Instant Rebate	Zero-Interest Financing
Purchase price	$1000	
Rebate	$70	none*
Amount due at checkout	$930	none
Monthly payment	none, if paying with cash, variable with credit card	$16.67 fixed

*Rebates can be combined with Financing, but are optional

refrigerators. The table above compares the impact of a $70 appliance rebate and zero-interest financing. With the rebate scenario, the customer still has to pay $930 up-front, which is why income-qualified customers are underserved by rebate programs, even if they are offered as point-of-sale rebates. With financing, the customer can check out with no money down and make affordable installment payments of less than $17 a month.

In California, financing is backed by a loan loss reserve funded by the energy efficiency public benefit charge under the GoGreen Home Energy Financing program. The SoCalGas Marketplace, which was initially promoted to customers in October 2021, has proven its ability to empower underserved borrowers, including the low-income, credit-challenged and renter segments:

- 89% of purchase transactions have been financed;
- 87% of loans have gone to underserved borrowers (LMI census tract or credit-challenged);
- 55% of loans have gone to borrowers with credit scores below 640, who normally would not have access to a credit card;
- 30% of loans have gone to renters.

Ohio utilities should provide their customers with efficient shopping experiences and they should be allowed to fund credit enhancement mechanisms like loan loss reserves and/or buy down interest rates with energy efficiency budgets, targeting income-qualified and other underserved or disadvantaged communities.

Conclusion

There are opportunities for Ohio's EDUs to offer innovative, energy-saving programs to their utility customers. Since Ohio's electric energy efficiency programs were discontinued in 2020, customers have missed out on many of these opportunities. Bringing programs back is an

important step toward Ohio's bright and energy efficient future. We look forward to continued discussion and dialogue with the Commission at the upcoming Energy Efficiency Forums.

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