

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Midwest Energy Efficiency Alliance	20 CSR 4240-21.010 (2) (c) 7.	7. Diversity of supply-side and demand-side resources;	<i>Provide emphasis that IRP is not solely about supply-side resources, and that diversity of both resource types (supply and demand-side) is important to a robust resource plan.</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (2)	“Alternative resource plan means a schedule of a combination of supply-side, demand-side, and distribution and transmission resource additions and retirements developed, or operated by a third-party under a contract including a lease, power purchase agreement, or other service contract, and analyzed by an electric utility as part of its integrated resource plan to meet its load serving obligations.”	<i>This language was used in Ohio 2025 HB 15 and provides a broad coverage of other ways that utilities are obtaining resources from third-party providers in the energy marketplace, besides direct development.</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (4)	Appliance Measure saturation means the statistical measurement of the percentage of homes or businesses that possess a specific type of electric or gas appliance technology (e.g., an appliance, mechanical system or control such as central air conditioning, electric water heater, gas furnace, and a or smart thermostat, etc.) within an electric utility’s service territory. Appliance Measure saturation, along with the Unit Energy Consumption (UEC) for each appliance technology , is used as an independent variable in end-use forecasting models.	<i>We would suggest substituting “measure saturation” for “appliance saturation” because it is more accurate to commonly used industry terminology. Referring broadly to multiple technology types as “appliances” is inaccurate and we correct that here.</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21. 030 (1) (E)	Where employing end-use forecasting, the electric utility shall use the most current available data on appliance measure saturation, efficiency trends, and customer adoption of new technologies, including distributed energy resources (DER) and demand-side measures. The electric utility shall	<i>As noted above</i>

		describe and document the descriptive statistics for each end-use.	
Midwest Energy Efficiency Alliance	20 CSR 4240-21. 030 (1) (I)	The electric utility shall ensure the forecast is generally aligned with the energy efficiency potential assessment, including alignment of baseline conditions such as new housing and commercial building starts, appliance measure saturations, employment growth, federal standards, building codes, and program offerings.	<i>As noted above</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21. 030 (3) 2.	When the electric utility uses end-use determinants, the electric utility shall demonstrate that appliance measure saturation, efficiency trends, technology adoption, electrification, and customer behavior are explicitly represented in the model.	<i>As noted above</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.050 (1)(D)	The electric utility shall describe and document the electric utility's assumptions concerning the change in baseline conditions, due to the adoption of energy efficiency measures by customers or consumers outside of any utility-sponsored programs, new housing and commercial building starts, appliance measure saturations, employment growth, federal standards, building codes, and other relevant factors. The electric utility shall provide an estimate of all changes in peak consumption and energy consumption, separately, due to the factors above by calendar month consistent with 20 CSR 4240-21.030 and the assumed program costs in each year of the planning horizon for each potential demand-side program.	<i>As noted above</i>

Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (19)	<p>Demand-side program means an organized process for packaging and delivering to a particular market segment a portfolio package of end-use measures that is broad enough to include at least some measures that are appropriate for most members of the target market segment.</p> <p>Demand-side portfolio means a group of demand-side programs that include measures appropriate for most members of a target market segment.</p>	<p><i>The way this is written, it conflates two distinct but related concepts, which we suggest could be broken up into separate definitions.</i></p> <p><i>In the demand-side industry, a “portfolio” is generally defined as the larger umbrella unit, made up of the individual programs. A portfolio can also refer to all of the programs targeted at a market segment (i.e., the “residential portfolio”). The broad diversity of serving all members of a market should be seen at the portfolio level.</i></p> <p><i>A “program” is the targeted package of end-use measures and does not generally have to be appropriate for most members of a target market – it can be specific to serving a particular target. There should be programs that reach all market members, but each program can be tailored.</i></p>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (20)	Demand-side resources means resources designed to reduce or shift electricity consumption, particularly during peak demand times, and can include energy efficiency programs and demand response programs.	<i>An important component of DR programs in addition to the ability to shed load is the ability to promote end-users to shift electricity use to lower-cost off-peak hours, though not reducing the total number of kWh consumed. This clarifies that DR resources can have both of these functions.</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (45)	Implementation plan means the supply-side and demand-side resources or quantity of supply-side resources by supply-side resource type, or both, to be constructed or acquired as part of the preferred resource plan over the implementation period and any other information required in accordance with 20 CSR 4240-21.065.	<i>The demand-side resources selected should also be included in implementation plans.</i>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (50) (F)	Load shape means providing more detailed energy use information such as a monthly and/or typically on an hourly schedule.	<i>Hourly (“8760”) load shapes are industry standard and should be used in preference to monthly load shapes. This leaves it open enough that if hourly load shapes were not available that a justification could be provided to use a monthly shape.</i>

Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (61)	<p>Maximum achievable potential means energy savings and demand savings relative to an electric utility’s baseline energy forecast and baseline demand forecast, respectively, resulting from expected program participation and ideal implementation conditions. Maximum achievable potential establishes a maximum target for demand-side savings that an electric utility can expect to achieve through its demand-side programs and involves incentives that represent a very high portion of total program costs and/or very short customer payback periods. Maximum achievable potential is considered the hypothetical upper-boundary of achievable demand-side savings potential, because it presumes conditions that are ideal and are not typically observed.</p>	<p><i>Changing this to an “and/or” clarifies that high incentives do not necessarily equate to very short payback periods and vice-versa. For example, a low-cost measure could have a minimal incentive but still provide enough savings for a short payback.</i></p>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.015 (77)	<p>Realistic achievable potential means energy savings and demand savings relative to an electric utility’s baseline energy forecast and baseline demand forecast, respectively, resulting from expected program participation and realistic implementation conditions. Realistic achievable potential establishes a realistic target for demand-side savings that an electric utility can expect to achieve through its demand-side programs and involves incentives that represent a moderate portion of total program costs and/or longer customer payback periods when compared to those associated with maximum achievable potential.</p>	<p><i>As noted above.</i></p>

Midwest Energy Efficiency Alliance	20 CSR 4240-21.040 (1) (G)	<p><i>Add point #7:</i></p> <p>7. A discussion of alternatives to transmission upgrades that were considered, such as advanced transmission technologies or non-wires solutions that could defer or delay the need for transmission upgrades.</p> <p><i>Add definitions to 20 CSR 4240-21.015:</i></p> <p>“Advanced transmission technologies” means hardware and software solutions that can be used to improve and enhance the transmission system, including dynamic line rating, topology optimization, power flow controllers, advanced conductors, and other technologies.</p> <p>“Non-wires solutions” means deploying DSM and DER resources in specific geographic locations to avoid investment in transmission or distribution system upgrades.</p>	<p><i>We would like to see the utilities discuss in this report the alternatives they explored in addition to capital investment in transmission upgrades, whether or not they were adopted.</i></p> <p><i>The definition of advanced transmission technologies is based on the US Department of Energy. The definition of non-wires solutions comes from Chapter 13 of the 2026 edition of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (NSPM).</i></p>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.050 (3)(C)	<p>A potential MEEIA demand-side resource consists of a demand-side program designed to modify reduce or temporally shift the net consumption of electricity on the retail customer's side of the electric meter, including but not limited to energy efficiency measures, rate management, demand response, and interruptible or curtailable load.</p>	<p><i>This provides language clarity of what modifying consumption means, and that it is inclusive of both load shedding and load shifting.</i></p>

Midwest Energy Efficiency Alliance	20 CSR 4240-21.060 (1)(C)1.	<p><i>Add point E:</i></p> <p>E. Expected demand-side resources expressed in megawatt-hours of energy per year and/or megawatts of capacity per year.</p>	<p><i>Adding a metric here for demand side resources emphasizes that they also contribute to the “adequacy, flexibility, and operational reliability” of the portfolio.</i></p>
Midwest Energy Efficiency Alliance	20 CSR 4240-21.060 (1)(C) 2.C.	<p>C. Annual rate impact, bill impacts for participants and non-participants in demand-side programs, and participation rates for all customers and low-income customers in demand-side programs;</p>	<p><i>These recommendations provide the full complementary analysis that should be conducted along with benefit-cost analysis to help regulators strike a balance between rate, bill, and participation impacts from DSM. The rate impact will be the same across the customer class, irrespective of whether a customer participates. Bill impact analysis will provide an explanation of the difference between participants and non-participants that does not come from rate impact analysis. Participation rates provide the understanding of what portion of the customer base is falling into each of those bill impact categories. A full discussion of rate, bill and participant impacts can be found in the Appendix B of the 2026 edition of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources.</i></p>