



May 18, 2020

Mr. Andrew S. Johnston  
Executive Secretary  
Maryland Public Service Commission  
6 Saint Paul Street, 16<sup>th</sup> Floor  
Baltimore, MD 21202

**Re: In the Matter of the EmPOWER Maryland 2018 – 2020 Energy Efficiency, Conservation and Demand Response Program Plans Pursuant to the EmPOWER Maryland Energy Act of 2008 – Potential Program Investments during COVID-19 Pandemic**

Dear Mr. Johnston:

At the May 7, 2020 EmPOWER Maryland hearing, Mr. Grevatt, speaking on behalf of the Maryland Energy Efficiency Advocates (“MEEA”) proposed the Commission consider alternatives to either 1) refunding unexpended EmPOWER funds to customers, or 2) using those funds to reduce the balance of amortized expenditures that have yet to be collected. Specifically, Mr. Grevatt proposed the Commission consider investing some or all of these funds in programs that will assist customers in reducing their energy bills. MEEA has long advocated that EmPOWER savings be increased for economically vulnerable populations, and the need is unquestionably much greater as a result of dramatic increases in unemployment that are resulting from COVID-related work closures. In response to Commissioner Michael Richard’s invitation to submit suggested programs that the Commission could consider directing the utilities to implement, MEEA provides the following proposals:

1. Accelerate and increase the deployment of virtual Quick Home Energy Check-ups (“QHECs”), coupled with energy efficiency kits, as described by PEPCO Holdings’ witness Mr. Ellis at the hearing. Whether implemented by the utilities, Maryland Department of Housing and Community Development (“DHCD”), or through a joint services model, virtual QHECs could be provided with a strong focus on low-cost/no-cost measures that can help families reduce their energy bills. QHECs could be targeted to low- and moderate-income customers, including those who may not have been able to participate previously because they were unable to take time off of work for in-person appointments;
2. Virtual QHECs targeted to limited-income families could be modeled along the lines of the DHCD’s Low Income Energy Efficiency Program Tier 1 projects to provide measures such as appliance and HVAC replacements, at no cost to income-eligible participants. The limited-income virtual QHEC could be used to

identify and add households with high energy use to a queue for DHCD follow-up comprehensive services when it is safe to work in homes again in the 2021-23 program cycle;

3. Virtual QHECs that are targeted to the living units of affordable multifamily homes could include engagement with property managers to assess efficiency opportunities for common area lighting and common building systems, including master-metered heating, cooling, ventilation, laundry, cooking, and water heating savings. These potential projects can be queued up for future measures when it is safe to work in buildings again;
4. Programs designed to promote high-efficiency equipment at the time of natural replacement could be dramatically increased, potentially shifting entire product categories to high efficiency lines through aggressive distributor-targeted midstream or point-of-sale programs;<sup>1</sup>
5. Unspent 2018-2020 budgets could be carried over to fund increased DHCD program participation when it is safe to work in homes again in the 2021-23 program cycle. Funds could also be targeted to health and safety measures, thus allowing EmPOWER to provide services to homes which were previously not able to participate in EmPOWER. Maximizing the use of approved budgets by carrying them forward will provide significant, desperately needed benefits to struggling families without further increasing the amortized balance.

Respectfully, MEEA urges the Commission to consider these opportunities to use funds from anticipated under-spending to contribute to meeting the needs of the many Maryland families who struggle to pay their energy bills.

Please let me know if any additional information is needed. Thank you for your attention to this matter.

Sincerely,



---

Susan Stevens Miller

*On Behalf of MEEA*

cc: EmPOWER stakeholders (via email only)

---

<sup>1</sup> If a customer has a failed heating or cooling system the amount of interaction required between distributor, contractor, and occupant is the same whether mid-efficiency or high-efficiency equipment is installed, thus such programs are a natural fit for increasing efficiency when discretionary replacements are limited by the pandemic.