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**Testimony on Behalf of the Midwest Energy Efficiency Alliance
Ohio House Public Utilities Committee
March 21, 2017**

Dear Chair Seitz, Vice Chair Carfagna and Members of the Ohio House Public Utilities Committee:

The Midwest Energy Efficiency Alliance (MEEA) seeks to submit this written testimony related to HB 114.

MEEA is a regional non-profit membership organization which serves as the Midwest's key proponent and resource for energy efficiency policy. MEEA covers thirteen states in the Midwest and our 160+ members include investor-owned, cooperative and municipal utilities; energy efficiency service and technology providers; manufacturers; state and local government representatives; and, academic, advocacy and research organizations. MEEA serves as a bipartisan resource to policymakers and our organization does not lobby or intervene. A leader in raising and sustaining the level of energy efficiency in the Midwest, MEEA fosters market penetration of existing energy-efficient technologies and promotes new technologies, products and policy and program best practices. As the trusted source on energy efficiency in the Midwest, MEEA educates and advises a diverse set of stakeholders on new and meaningful ways to pursue an energy efficient agenda that's both achievable and cost-effective.

Executive Summary

Over the past several years, Ohio has been a Midwest region leader in achieving cost-effective electric energy efficiency. SB 221, which created Ohio's energy efficiency resource standard (EERS), was enacted in 2008 thanks to overwhelming bipartisan support - the bill passed the Ohio Senate 32-0 and the Ohio House on a 93-1 vote. Ohio's EERS has produced continued economic benefits for customers throughout the state. This policy delivers electric savings in a highly cost-effective manner and provides a single, predictable framework for achieving electric savings. Carrying out Ohio's energy efficiency standard through 2025 will save Ohio consumers nearly \$5.6 billion in avoided energy costs- far exceeding the cost for utilities (\$2.8 billion) to implement the programs.

MEEA is supportive of the legislature's desire to explore policy and regulatory reform, but encourages you to build upon and not weaken Ohio's EERS as it was passed in SB 221 and amended in SB 310. The law currently requires investor-owned electric utilities and retail suppliers to achieve savings through energy efficiency programs equal to at least 0.3% of sales beginning in 2009, gradually ramping up to 1% in 2014, to a cumulative 22% in electricity reduction by the end of 2026. HB 114 would, in effect, freeze Ohio's energy savings goal at 1% through 2025.

Ohio need only look to her neighbor Indiana to see the importance of maintaining an EERS. Following Indiana's repeal of its energy efficiency standard in 2014, investment in energy efficiency programs in Indiana declined substantially and the overall cost-effectiveness of energy efficiency programs was reduced, which means lower energy savings and a loss of jobs and related economic development. The damage has been exacerbated by the simultaneous creation of an industrial opt-out provision, which allows industrial companies to opt-out of paying into the utility energy efficiency programs.

Energy Efficiency Resource Standards

An EERS – a proven effective public policy – consistently delivers cost effective energy efficiency which benefits all consumers (residents and businesses) and reduces energy costs for all rate classes. In the years immediately following the passage of SB 221, annual electricity savings increased twelve-fold since enactment in 2008. The chart below shows the minimal energy efficiency savings in the years preceding SB 221. From 2009-2014, Ohio utilities collectively exceeded the savings targets by an average of more than 50% above the target.

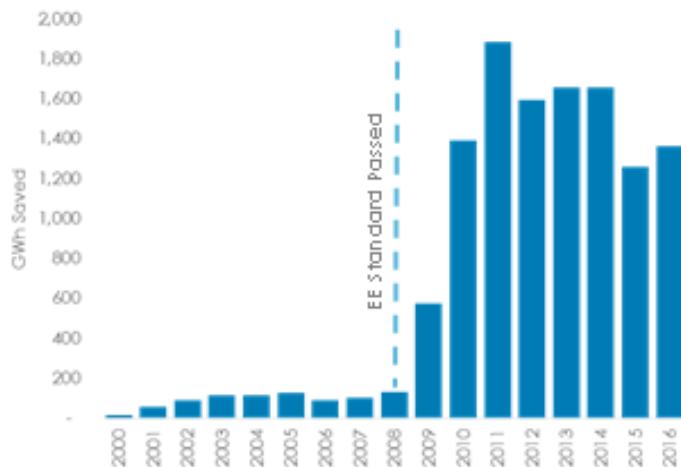


Figure 1: Electricity Savings in Ohio through Utility Efficiency Programs

Ohio's utility-run energy efficiency programs have been very cost-effective. In 2015, for every \$1 spent on energy efficiency programs in Ohio, residents and businesses reaped \$1.90 in benefits. This return on investment for energy efficiency programs is derived from an independent third-party evaluation of utility energy efficiency programs and is a result of a highly analytical and scrutinized process.

Under HB 114, the efficiency savings targets would remain at 1% until 2025, thus, in effect, prolonging the 2015-2016 freeze on the state's EERS that was created by SB 310. Furthermore, penalties for noncompliance with the EERS targets would only be levied for the years 2016, 2019, 2022, 2025 and 2027, making the standard voluntary for years 2017-2018, 2020-2021, 2023-2024 and 2026. Watering down Ohio's EERS by both lowering the savings targets making noncompliance subject to penalties only for certain years, weakens the standard's ability to drive significant energy savings and cost-effective efficiency program offerings consistently year over year. Lastly, it has the potential to create uncertainty for utilities and their customers.

While many states across the country have pursued numerous approaches to drive energy savings, none substitute for an energy efficiency standard that requires cost-effective energy savings programs. In the Midwest region, all of those states that rank in the top six for greatest amount of electricity saved as a percent of total retail electricity sales have a statewide mandatory EERS. In 2014, prior to the passage of SB 310's freeze on the EERS, Ohio was third in the 13-state Midwest region for the highest amount of electricity saved as a percent of total retail electricity sales.

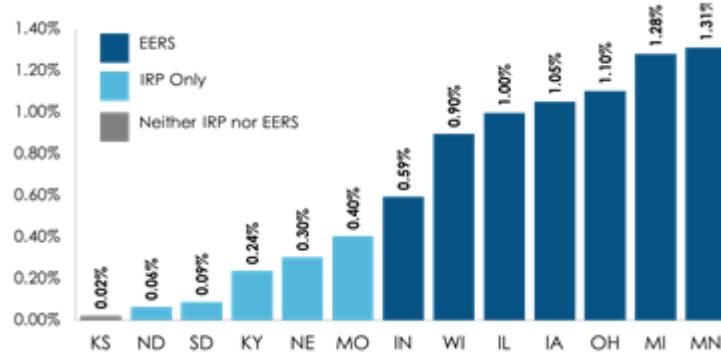


Figure 2: Saved electricity as % of total retail sales, 2014

Utility Investment in Energy Efficiency Has Positive Economic Impacts

The economic reach of programs driven by the EERS is widespread. These savings targets create the predictability and certainty companies in the energy efficiency industry need to continue to invest in Ohio and attract new investment. The 2014 programs alone are estimated to create more than 14,000 jobs, increase statewide income by over \$1.2 billion, add nearly \$1.9 billion of economic value and generate almost \$3.3 billion in sales between 2014 and 2038.¹ In addition to the impacts from program year expenditures, efficiency investments continue to generate positive net economic benefits for as long as energy savings continue. Ongoing energy savings allow participants to spend less money on energy and more on other products and services, many of which have relatively localized supply chains.

Ohio is an energy-intensive state. Accordingly, Ohio utilities benefit from reduced fuel and power purchases, transmission and distribution costs, emission allowance costs and supply capacity requirements. It is important to the state's economy that the legislature ensures Ohio's energy needs are met in low-cost and reliable ways. At an average of \$14 per megawatt hour, energy efficiency is three times cheaper than new natural gas and coal fired power plants and two times cheaper than wind generation, as seen in Figure 3. It is because of Ohio's high energy needs that the EERS has had a profoundly positive impact on the state. The EERS drives the delivery of cost-effective programs that allow Ohio's residents and businesses to take advantage of the state's cheapest energy resource – energy efficiency.

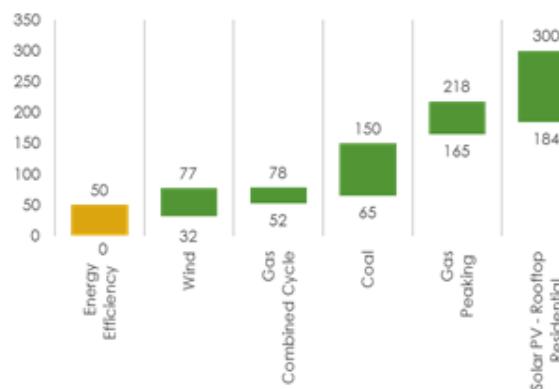


Figure 3: Lifetime cost ranges of new energy resources, 2015

¹ The Cadmus Group, Inc. *The Economic Impacts of Energy Efficiency Investments in Ohio*. October 2016.

If Ohio's EERS is weakened, the economic impact will be immediate and significant. In 2014, Indiana repealed its statewide energy efficiency standard. Since that change, total utility planned energy efficiency budgets for 2014- 2017 decreased by 5% while total planned energy savings decreased by 19%. These reductions led to an overall lowering of the cost-effectiveness of the energy efficiency program delivery for customers.² Additionally, a recent independent report by GoodCents estimated that Energizing Indiana saved about 11 million megawatt hours, resulting in significant cost savings and created approximately 18,679 jobs.³ Following Indiana's repeal of their energy efficiency standard, Johnson Controls expects to lose half of their 2,257 jobs created under the standard.⁴ Assuming the repeal similarly impacts other major Indiana companies, a 50% reduction in jobs created under the standard would result in the elimination of over 9,000 jobs.

Importance of Customer Participation

HB 114 expands the large industrial opt-out found in SB 310 from "primary voltage" customers to include any customer of an electric distribution utility, irrespective of size or voltage level. The economic impacts of any energy efficiency portfolio depend partly on the total level of investment and energy savings, and partly on the mix of programs. When more energy users participate in energy efficiency programs, more energy is saved at a lower cost and thus the strongest energy efficiency portfolios have a diverse program mix and participation from the residential, commercial and industrial sectors. All consumers benefit from energy efficiency regardless of whether or not they pay into energy efficiency programming. The benefits of efficiency include capacity related avoided costs such as the cost of building new generation, transmission and distribution facilities. Allowing customers to opt-out of paying into these programs, while continuing to benefit from them, unduly burdens the remaining ratepayers.

Conclusion

The stakes are high in Ohio as the EERS has not only served as sound energy policy, but also as a proven economic development policy. Beyond the jobs within the energy efficiency industry, programs stemming from the EERS have empowered businesses to invest in energy improvements that lower operating costs and improve their bottom lines. Such investments would not be possible without a standard driving the availability of cost-effective programs and the assurance of the EERS which allows for consistent availability of such programs. Energy efficiency programs deliver both the expertise necessary to make those investments and incentives that result in reduced payback periods for private investments. These investments lead to energy savings and positive financial benefits for all ratepayers. Therefore, we believe the retention of Ohio's energy efficiency policy, including keeping industrial customers as part of the program, is the best course for the state in sustaining and increasing cost-effective programs that will lead to continued economic growth for Ohio.

These comments reflect the views of the Midwest Energy Efficiency Alliance – a Regional Energy Efficiency Organization as designated by the U.S. Department of Energy – and not the organization's members or individual entities represented on our board of directors.

² Midwest Energy Efficiency Alliance. *Energy Efficiency in Indiana after Repealing the Statewide Standard*. April 24, 2015. http://www.mwaialliance.org/sites/default/files/uploads/advokit/MEEA_2015_Advokit_Energy-Efficiency-Indiana-After-Repealing-Statewide-Standard_April2015.pdf.

³ Indiana Statewide Core Program Evaluation Team. *2014 Energizing Indiana Evaluation Report*. P.161. May 2015.

⁴ Lydersen, Kari, "Who's behind the effort to kill Indiana's efficiency law? March 17, 2014.

<http://midwestenergynews.com/2014/03/17/whos-behind-the-effort-to-kill-indianas-efficiency-law/>.