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MAY 20 2019

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May 17, 2019

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA FEDEX:

New Jersey Board of Public Utilities
Attn: Aida Camacho-Welch, Board Secretary
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

**Re: IMO the Petition of Public Service Electric and Gas Company For Approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis
Docket Nos. EO18101113 and GO18101112**

Dear Ms. Camacho-Welch:

Enclosed are an original and ten (10) copies of the Initial Brief of Tendril Networks, Inc., in the above proceeding. By copy of this letter, copies of this Brief are being forwarded on this date via email to all persons whose names appear on the attached Service List.

Additionally, I have enclosed an extra copy of this Brief to be stamped "filed" and returned to this office in the enclosed self-addressed envelope.

Respectfully submitted,

FLORIO PERRUCCI STEINHARDT
& CAPPELLI, LLC

Kerry Cahill, Esq.

*Case mgmt
list copies*

Encl.

cc: All Persons on the Attached Service List (w/enc., via email only)



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**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS CLEAN
ENERGY FUTURE-ENERGY EFFICIENCY
("CEF-EE") PROGRAM ON A REGULATED
BASIS.

BPU DOCKET NOS.
EO18101113 and GO18101112

CERTIFICATION OF SERVICE

I, **KERRY E. CAHILL, ESQ.**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a member in good standing of the bar of this Court. I am an Associate of the law firm of Florio Perrucci Steinhardt & Cappelli, LLC, and represent Tendril Networks, Inc. ("Tendril").

2. On May 17, 2019, I caused to be served via electronic mail copies of Tendril's Initial Brief in the above-captioned proceeding on each person identified on the Service List. An original and ten (10) hard copies also have been sent via overnight delivery to Aida Camacho-Welch and New Jersey Board of Public Utilities, as well as a copy via electronic mail. Two (2) hard copies have also been sent via overnight delivery to Stephanie A. Brand, Esq., Division of Rate Counsel, and Mathew Weissman, Esq., PSEG Services Company.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 17, 2019



Kerry Cahill, Esq.

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its
Clean Energy Future – Energy Efficiency (“CEF-EE”) Program on a Regulated Basis

BPU Docket Nos. GO18101112 & EO18101113

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IN THE MATTER OF THE PETITION OF
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INITIAL BRIEF OF TENDRIL NETWORKS, INC.

Tenril Networks, Inc. (“Tendril”) is grateful for the opportunity to offer its Initial Brief and for the previous opportunities to present before the Board of Public Utilities. By way of background, Tendril was granted participant status in this proceeding by Order of Presiding Commissioner Diane Solomon on January 22, 2019. Subsequently, on March 21, 2019, Jeff Woodward, Director of Solutions Marketing for Tendril appeared at a Public Hearing Meeting in Hackensack, New Jersey. Tendril is a recognized leader and utility partner for behavioral energy efficiency and utility consumer engagement programs.

The comments in this Initial Brief are informed by Tendril’s experience and observations working with Public Service Electric & Gas Company (PSEG) and leading utilities around the country delivering energy efficiency through advanced customer engagement strategies.

Behavioral Energy Efficiency is a Unique Resource for New Jersey Customers

Behavioral energy efficiency is a safe, reliable and enduring resource for consumers and one of the core components of PSE&G’s proposed strategy. Historically, energy efficiency programs have relied primarily on financial incentives for energy efficient products. In contrast, Tendril’s solutions tap into other motivations to reduce energy use, improve customer satisfaction, inform on how energy is being used, and cross-promote other utility programs to consumers.

Importantly, except for the existing pilot program administered by PSEG, neither the Clean Energy Office nor other state programs are currently providing behavioral energy efficiency programs for New Jersey customers. As a result, moving forward with the program as proposed by PSEG will provide New Jersey customers with immediate and unique benefits that are not available through existing activities in the state.

Behavioral Energy Efficiency is a Highly Cost-Effective Resource

To date, Tendril has delivered over 100 million home energy reports and generated savings of over 3.5 TWh. Tendril's programs, on average, yield 1.8% savings for consumers, as verified in studies of over 20 different programs across the country. It is worth highlighting that the cost-benefit analysis shows the Residential Behavioral Subprogram being proposed is one of the strongest components of the overall strategy, with Total Resource Cost Test results of 1.4 and Societal Cost Test results of 3.3. Beyond these direct benefits, while the behavioral program represents under 2% of the total budget, it will deliver nearly 3% of emissions reductions, nearly 20% of the MWh savings and almost 25% of total participants, building strong consumer awareness that can help drive participation in other demand-side management programs. Tendril believes that, to borrow a phrase, these programs punch above their weight.

General Comments

Based on Tendril's unique commercial experience working with utilities and retail energy providers across a wide spectrum of regulatory structures, it would like to offer three observations that support the strategy described in PSE&G's application:

First, Tendril finds that it is able to deliver the best results when it works directly with the utility. Behavioral energy efficiency relies on increasingly sophisticated analytics and integration with utility customer information and meter data systems. Realizing benefits from customer engagement strategies also requires an understanding of and connection to the impacts felt by the customer and the grid. In addition, cybersecurity and the safeguarding of consumer data are enhanced by a direct integration with utility systems. While Tendril understands the reasons that led to BPU-implemented energy efficiency programs in the past, the technology landscape has changed dramatically in the past two decades. Today, it is far more powerful to take full advantage

of data-driven strategies that engage customers with advanced technology. This can only be done effectively with direct participation from the utility and taking advantage of their robust relationship with the customer.

Second, Tendril agrees with other comments provided on the record of this proceeding that highlight the benefits of aligned financial incentives for energy efficiency programs. This is especially true with an overarching and comprehensive strategy, as PSE&G is proposing, where many DSM programs have overlapping or interrelated objectives. These cross-cutting benefits can be supported with mechanisms such as decoupling and performance-based incentives that align with the overall goals of the BPU and the legislature.

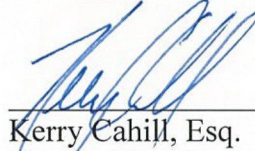
Third, Tendril's experience suggests that effective customer engagement benefits from flexible strategies that are responsive to customer behavior and feedback. Beyond the advantages previously mentioned, it believes utilities have the deepest understanding of individual consumer preferences and activities, especially if more granular AMI data is involved. The Tendril platform is designed to incorporate feedback from the consumer, capture observations about their behavior and adapt as we learn more about their individual customer preferences. As the Board is well aware, not all customers are the same. Subtle, but critical, differences affect energy savings, but also play a role in promoting other programs, including up-front rebates, efficient appliances, smart thermostats, energy audits and energy efficiency kits. This is one more reason why Tendril observes tremendous advantages to leveraging the utility's existing relationship and knowledge to both shorten and strengthen that vital feedback loop.

Conclusion

Tendril thanks the Board for the opportunity to share its observations and to present this Initial Brief. The comments Tendril has provided are targeted specifically at the areas with which it has specific expertise – behavioral energy efficiency and utility customer engagement. Tendril believes that the entire application as presented by PSEG provides a unified and comprehensive strategy that will bring significant benefits to New Jersey customers. In particular, Tendril believes that the behavioral energy efficiency program offers a unique resource that is currently not available to customers in New Jersey. Tendril encourages the Board to approve this program as soon as practical.

Respectfully submitted,

**FLORIO PERRUCCI STEINHARDT
& CAPPELLI, LLC**



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