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**Title:** Beneficial Load Growth through Electrification: Making BE part of the DSM portfolio

**Abstract:** Why would a utility pursue electrification and energy efficiency simultaneously? This question is central to existing policies that may frustrate a utility's efforts to introduce electrification programs. Based on findings from recent utility filings and implementation of electrification programs, we will present a case for 1) why electrification programs provide a win-win opportunity for utilities and customers, 2) why they should be welcomed as an important component of utility customer DSM/DER/DR program portfolios, and 3) how they can be designed to provide beneficial load growth while reducing emissions and assisting customers. While new policy that drives electrification may, in some instances, be appropriate, much existing policy hinders market-driven electrification in a way that is often inappropriate. For example, many utilities are subject to rules that prohibit an electric utility from promoting technologies that consume electricity. The industry refers to these as "promotional practices" or something similar. The way the rules are currently written, utilities are allowed an exception for energy efficiency measures. This is necessary because utilities have been promoting and incentivizing efficient light bulbs and electric motors for decades. Unfortunately, electrification - even beneficial electrification - does not currently fall under the umbrella of energy efficiency. ICF participated in several recent regulatory filings in which utilities presented evidence to support electrification as energy efficiency. In one case the utility's request for approval of a beneficial electrification program was denied because it was not load-conserving, but would result in load building. Similarly, a second utility met arguments that their electrification proposal conflicted with their energy efficiency portfolio. Again, the issue was one type of program was load conserving and the other load building. So why would a utility pursue electrification and energy efficiency simultaneously? Doesn't one simply negate the impacts of the other? In our experience they do not, and Beneficial Electrification makes sense as an integral part of a utility's demand-side management strategy. Beneficial electrification programs provide the same key benefits as energy-efficiency portfolios, namely reductions in overall energy consumption, reduced emissions, improved system utilization and new options for customers to manage their energy bills. In practice, electrification programs help customers improve operational efficiency while lowering their fuel bills and reducing site emissions.