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Our Energy... Your Power

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**Adrienne D. Kurtanich**
Attorney

May 15, 2015

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, Pennsylvania 17120

**RE: Act 129 Energy Efficiency and Conservation Program Phase III Reply Comments**
**Docket No. M-2014-2424864**

Dear Secretary Chiavetta:

On March 11, 2015, the Commission issued a Tentative Implementation Order seeking comments on the implementation of Phase III of the Act 129 Energy Efficiency and Conservation Program. The Tentative Implementation Order also requested reply comments. Duquesne Light Company's reply comments regarding Phase III are enclosed for consideration.

Should you have any questions, please feel free to contact me or David Defide at (412) 393-6107.

Respectfully,

Adrienne D. Kurtanich
Attorney, Regulatory



Enclosures
cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. §1.54 (relating to service by a participant).

### FIRST CLASS MAIL

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Harrisburg, PA 17105-3265

Office of Consumer Advocate
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Date: May 15, 2015

**BEFORE THE**

**PENSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|---|
| **Energy Efficiency and Conservation** | : | |
| **Program** | : | **Docket No. M-2014-2424864** |
| | : | |

**Reply Comments of Duquesne Light Company**

On March 11, 2015, the Pennsylvania Public Utility Commission ("Commission") issued a Tentative Implementation Order ("Phase III Tentative Implementation Order") to continue the process of evaluating the Phase III of Act 129's Energy Efficiency and Conservation ("EE&C") Programs for electric distribution companies ("EDCs"). Pursuant to the Phase III Tentative Implementation Order, interested parties had thirty days from the date of publication in the Pennsylvania Bulletin to file comments. Interested parties ranging from EDCs to customer groups and consumer advocacy groups filed comments on the Phase III Tentative Implementation Order on April 27, 2015. The Phase III Tentative Implementation Order also provided that interested parties the opportunity to provide reply comments. Duquesne Light Company ("Duquesne Light") hereby files reply comments in response to select comments filed by other interested parties. While Duquesne Light's reply comments will not address all comments filed, the absence of a response to comments filed by any interested parties should not be construed as assent to any particular position.

## 1. Demand Reduction

### A. Duquesne Light Is Opposed to Mandatory Requirements for Additional Peak Demand Reduction Targets

A broad spectrum of parties including consumer advocates, environmental groups, customer groups, and EDCs filed initial comments opposing the requirements of the Phase III Tentative Order for additional demand reductions and mandated demand response ("DR") programs. Parties that have noted opposition to the DR mandates include Duquesne Light, the Energy Association of Pennsylvania ("EAP"), the Environmental Defense Fund, First Energy Companies, Industrial Customer Groups, the Natural Resources Defense Council, the Northeastern Energy Efficiency Partnerships ("NEEP"), the Office of Small Business Advocate ("OSBA"), PennFuture, PPL and the Sierra Club.

Like those commenters, Duquesne Light does not believe that Act 129 requires the implementation of DR programs and believes that the Commission should prioritize Phase III. Duquesne Light's position is supported by the comments of several consumer groups and EDCs. For instance, NEEP states that no language within Act 129 references "demand response" and that energy efficiency should be the priority. Additionally, the Environmental Defense Fund, Natural Resources Defense Council, the Sierra Club, the Clean Air Council, and Citizen's for Pennsylvania's Future, hereinafter "Joint Commentators", state in their Comments that statutory language calls for a program that creates a "reduction in demand" and neither requires "demand response" nor implies that demand response is the only program design permitted. Duquesne Light agrees with that interpretation and further agrees with the assertion of the Joint Commentators that the costs associated with DR are an order of magnitude higher than energy efficiency program acquisition costs. PPL also requests that the Commission eliminate its DR target and reallocate the funding to energy efficiency. Duquesne Light agrees with the positions raised above and requests the Commission remove Demand Response reduction targets and budget allocations from the Phase III Tentative Implementation Order.

Even if the Commission does not agree with the positions presented above, Duquesne Light does not believe that the Commission should consider DR to be cost-effective. Duquesne Light asserts that uncertainties and volatility in the capacity market prevent the cost-effectiveness of DR in future years from being ascertained. In its comments, the First Energy Companies state that capacity market uncertainties including unknowable PJM RPM BRA capacity values in several years within the Phase III performance period could prevent an EDC from attaining DR targets. Duquesne Light agrees, and has first-hand knowledge of the volatility of capacity values in its zone. As shown below, PJM BRA results range dynamically from $16.46 to $174.29 in the previous eleven year period.

| Planning Period | Base Residual Auction Date | DLC Zone RPM Clearing Price $/mw-day | Effective |
|---|---|---|---|
| 2007-2008 | May 2007 | $40.80 | 6/1/2007 |
| 2008-2009 | July 2007 | $111.92 | 6/1/2008 |
| 2009-2010 | October 2007 | $102.04 | 6/1/2009 |
| 2010-2011 | January 2008 | $174.29 | 6/1/2010 |
| 2011-2012 | May 2008 | $110.00 | 6/1/2011 |
| 2012-2013 | May 2009 | $16.46 | 6/1/2012 |
| 2013-2014 | May 2010 | $27.73 | 6/1/2013 |
| 2014-2015 | May 2011 | $125.99 | 6/1/2014 |
| 2015-2016 | May 2012 | $136.00 | 6/1/2015 |
| 2015-2016 | May 2013 | $59.37 | 6/1/2016 |
| 2016-2017 | May 2014 | $120.00 | 6/1/2017 |

The auction results for Phase III years 2019/2020 and 2020/2021 remain unknown. Based upon the data from previous years shown above, significant uncertainty exists about the future avoided cost of capacity and the bases for the Statewide Evaluator's ("SWE") DRMP's forecast of cost-effective DR potential. Since future auction results are unknown, Duquesne Light does not agree that DR is necessarily cost-effective for future years within Phase III.

Another concern that Duquesne Light has regarding DR relates to customer compensation. The Industrial Customer Groups[1] are also concerned with customer compensation and comment that the SWE, in its Commission adopted program design, is unable to articulate the compensation that a customer will be paid in exchange for their curtailment commitment. They also view the DR goal as duplicative and unnecessary and, like many other parties to this proceeding, also believe that there should be a moratorium placed upon any decision pending resolution of FERC Order 745. Duquesne Light agrees that the issues raised by the Industrial Customer Groups present concerns and believes that a decision to order the implementation of DR is not prudent at this time.

However, if the Commission does not remove DR reduction targets and the associated budget allocations, Duquesne Light recommends an alternative approach to the budget allocation as presented by the Joint Commentators. The Joint Commentators made a recommendation to apportion each EDC's total budget by customer class based on sales, and then evaluate the extent to which cost effective demand reduction exists within each customer class. Duquesne Light believes such an approach to be consistent with a fundamental tenet of energy efficiency: one can only save energy where it is being consumed. The suggested demand based allocation by

[1] Members of the Industrial Customer Groups include the Industrial Energy Consumers of Pennsylvania ("IECPA"), Met-Ed Industrial Consumers Group ("MEIUG"), Penelec Industrial Consumer Alliance ("PICA"), Penn Power Users Group ("PPUG"), Philadelphia Area Industrial Energy Users Group ("PAIEUG"), PPL Industrial Customer Alliance ("PICA"), and West Penn Power Industrial Intervenors ("WPPII").

customer class is consistent with potential forecasting practices and provides for program benefit customer class equity. Duquesne Light agrees with such an apportionment.

**B. While Duquesne Light Is Opposed to Demand Response Reduction Targets Generally, If Targets Are Mandated, the Commission should Remove the Overly Prescriptive Program Design**

Multiple comments on the Phase III Tentative Order articulate that the Commission's proposed DR program design is overly prescriptive and propose alternatives. For instance, Citizen's Power suggests that EDCs be allowed to propose dynamic thresholds for the triggering of call events as opposed to the 96% peak methodology identified by the Demand Response Potential Study ("DRPS") and Phase III Tentative Implementation Order. KEEA also requests that the Commission encourage EDCs to deploy innovative programs beyond those prescribed in the DRPS and Phase III Tentative Order. PennFuture urged the Commission to revise the DR Program Design section to allow for other forms of demand reduction such as energy efficiency to ensure the equitable distribution of funding across classes. The Office of Consumer Advocate ("OCA") also asserts that the Commission may have been unduly prescriptive in its program design. Duquesne Light agrees with Citizen Power, KEEA, the Joint Commentators, and the OCA that the Phase III Tentative Implementation Order imposes, at a high level of specificity, a program design that EDCs must implement and subsequently stand accountable for Commission levied penalties, should the programs under perform. As the DR Program Design stands, underperformance may occur due to factors outside of the control of the EDCs.

**C. If the Commission Requires Demand Response Reduction Targets and Budgetary Allocations to Demand Response Programs, Duquesne Light Is Opposed to the Exclusivity of Act 129 and PJM DR Programs**

As the directive in the Phase III Tentative Order stands, customers would not be able to participate in both PJM and Act 129 DR programs. The Joint Commentators have raised concerns that Act 129 funding may be spent to encourage customers participating in the PJM ELRP program to switch to and EDC program. The Industrial Customer Group states the proposed Order prohibits customers in PJM programs from participating in an Act 129 offering. However, PJM capacity markets require an advance commitment of up to three years. The inability of key customers to participate in Act 129 programs results in inequity as these customers will have to pay for Act 129 programs they cannot use. The Industrial Customer Groups urge the Commission to exclude DR goals from Phase III due to likely "competition" that will occur with the existing PJM DR programs.[2]

KEEA also supports allowing customer participation in both PJM and Act 129 programs. KEEA asserts that there are safeguards the Commission can impose that ensure against a certain amount of double counting without eliminating dual participation.[3] OCA also states that an outright disallowance of dual participation in PJM and Act 129 DR programs may have unintended consequences in Pennsylvania by causing customers to select a DR program based upon compensation.[4] Customers could potentially choose a DR program based upon which program pays the highest amount of compensation. Such a result is contrary to the intent of Act 129. Duquesne Light agrees with the parties opposed to the proposed mutual exclusivity of Act

[2] Industrial Consumer Group at 11.
[3] KEEA at 10.
[4] OCA at 7.

129 and PJM DR program requirement. Further Duquesne asserts that if mandated by the Commission to implement DR programs, such mutual exclusivity will impose a significant barrier on program participation by qualified customers.

### D. Demand Response is Best Treated as a Capacity Resource and Measured Based on *Availability*

Duquesne Light has several concerns related to DR reductions, which other commentators also addressed. The Joint Commentators state that "peak demand reductions are intended to address issues with reliability and high peak power costs that tend to occur as exceptional events."[5] OCA states that by requiring compliance based on actual load interrupted, the Commission may be increasing the cost of DR while reducing actual benefits to ratepayers.[6] Duquesne Light also agrees with the Joint Commentators on the premise that the programs and their measurement should fit the activity. DR activity is best suited to ensuring peak period reliability, in response to exceptional events. OCA's reference to the "actual load interrupted" also characterizes DR as a reduction to be called when needed and provided under binding commitment.[7] Duquesne Light advances the future of DR is uncertain, however; if the Commission elects to Order it, EDCs should be able to plan programs best suited to the resource. Demand response is best treated as a capacity resource and measured based on availability.

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[5] Joint Comments at 10.
[6] OCA at 5.
[7] Id.

## 2. Duquesne Light Is Opposed to Increased Energy Efficiency Targets Based Upon Historical Performance

Duquesne Light is opposed to increased energy efficiency targets and disagrees with the comments filed by both the Joint Commentators and the Pennsylvania Department of Environmental Protection ("DEP"). The Joint Commentators commented that the Commission should review EDCs' annual reports and if significant carryover is expected, consider revising the effected EDC's targets. Duquesne Light asserts that targets should not be increased during Phase III and should not be based upon the performance during prior phases. DEP also commented that it strongly believes the Commission should pursue more aggressive targets for each of the EDCs. Such targets would give more weight to historic performance which has outpaced potential calculations. Historical performance will not necessarily hold true in Phase III, as the availability of certain options has diminished.

Fundamentally, Duquesne Light disagrees with the Joint Commentators and DEP on the basis that past performance does not indicate future capabilities. Future conditions include greater baseline saturations of energy efficient technologies and significant increases in baseline minimum federal efficiency standards. With the addition of lower acquisition rates and proposed carve-outs for low income and G/E/NP, there is no guarantee that EDCs performing well in the past will continue to meet mandated goals in the future.

Additionally, Duquesne Light disagrees with the Joint Commentators and DEP, because such treatment makes the EDC responsible for not only for program results, but for the forecast of future program results. Duquesne Light asserts that their logic is counterintuitive and penalizes exceptional performance. In Pennsylvania there are no utility incentives for successfully implementing high performance energy efficiency programs and only penalties for under performance. If the Commission adopted the logic presented by the Joint Commentators and DEP, EDCs would be incentivized to only meet the minimum requirements as higher performing EDCs would then be held to higher future targets that may be unattainable under unknown future conditions. Ratepayers of higher performing EDCs would also shoulder a burden as the costs of the EDCS' programs would increase as the requirements increase.

**3. Duquesne Light Is Supportive of Incremental Savings**

Duquesne Light supports incremental savings. KEEA commented that EDCs should be given credit for all new incremental saving delivered in each year of the Phase, rather than exclusively focusing on cumulative savings in the final year. KEEA further advanced that such treatment would allow EDCs to make better use of behavioral programs. Duquesne Light agrees that the incremental tabulation of first-year annualized savings will make it possible for EDCs to offer behavioral programs in all years, as well as a host of other important short-life measures. Cost-effective measures are an important part of a balanced portfolio offering that includes both long- and short-lived measures.

Of further importance, inexpensive cost-effective measures paired with more expensive measures can result in cost-effective and well balanced projects. Customers often decide to implement energy efficiency improvements based on the cost-benefit evaluation of the project rather than with an evaluation based upon specific measures included in the overarching project. Likewise, EDCs typically perform cost-effectiveness screening at the project level rather than at the measure level. Hence, a well-balanced combination of short and long life measures can allow a project to be implemented, whereas a project containing only expensive long-life measures may be rejected due to long customer pay-back periods and/or limited cost-effectiveness for the EDC. Without an assortment of quick paying and inexpensive measures, long-life expensive measures may become stranded energy efficiency assets as neither customers nor EDCs will choose to use these measures on their own.

Duquesne Light stated, in its original comments on Phase III, that the proposed cumulative program accounting method removes expired measures savings from the running total and thus distorts the reporting of Act 129 costs and benefits. The practice would serve to under count associated energy savings and under count ratepayer benefits. Duquesne further asserts that the avoided costs benefits achieved during a measure's life do not suddenly become un-avoided when the measure reaches then end of its useful life.

Duquesne Light also opposes any treatment where the economic benefit may be retained for reporting purposes but savings is not available for compliance purposes. Duquesne Light recommends that the Commission should not separate the reporting of energy efficiency savings impacts from the cost required to deliver them and urges the Commission to employ first-year incremental savings, tabulated each year of the Phase to render Cumulative Program Inception-to-Date savings impacts. Duquesne Light further recommends that the Commission should adjust the EDC acquisition rates and compliance targets specified in the Phase III Tentative Implementation Order to consistently reflect annual incremental accounting without decay.

**4. Duquesne Light Is Opposed to A Direct-Install Requirement for Low-Income Customers**

Generally, the EDCs are in agreement with the Commission in regard to the establishment of a 5.5% consumption target from the low-income sector. However, there is an overarching concern with the Commission's proposal of the additional requirement that each EDC must obtain no less than 2% of their overall consumption reduction target from direct-installed low-income measures. A prime example of the EDCs' concerns about the Commission's direct-install target versus the requirements of Act 129 was presented by PECO in its initial comments. PECO stated "[a]t the onset, the Company notes that the only Act 129 requirement related to the low-income sector calls for a proportionate number of measures equivalent to the low-income sector's share of usage, rather than a savings target for the low-income sector or savings requirement for certain types of low-income measures." Thus Act 129 itself does not require direct-install measures for the low-income sector but rather a target of the total number of measures to be provided.

Duquesne Light also agrees with PECO's interpretation that Act 129 does not specify certain types of measures such as direct-install measures, weatherization measures, and non-lighting measures must be utilized to meet the targets for the low-income sector. Duquesne Light also agrees that no actual savings potential or cost or benefit information specific to direct install measures was used to develop the 2% target. Duquesne recommends that the Commission should withdraw its direct-install requirement in the absence of such analysis.

As background, the proposed 2% direct-install requirement, new for Phase III, mirrors the types of measures installed in the LIURP and Department of Community and Economic Development ("DCED") low-income weatherization programs. Duquesne Light currently participates in these programs, which have been successful but therefore reduce the customer base and market potential available for direct-install measures in Phase III. The costs associated with direct-install measures are also prohibitive when working with a limited budget.

Other EDCs have found that a high percentage of the budget will be required to meet the 2% direct-install requirement. PECO noted that 7.8% of its total annual budget will be required to achieve 2% overall savings from low income direct install programs. PPL also projected that in order to achieve the overall 5.5% of portfolio savings, low income programs will be approximately 23% of the total portfolio costs. PPL further stated that the SWE's EE Study overestimated the market potential for Act 129 low-income direct-install measures by incorrectly assuming that all available potential is served by Act 129 rather than shared between Act 129, LIURP, and Weatherization Assistance Program ("WAP"). As a large segment of the market potential has been cannibalized by LIURP and WAP, PPL recommended that the low income 2% goal be altered to be optional rather than mandatory.

Duquesne Light is concerned about the abovementioned findings reported by PECO and PPL, given the low electric water heating and low electric space heating end-use saturations in its service territory. Duquesne Light would likely require an even more significant portion of its portfolio budget to accomplish these levels of savings impacts. Duquesne Light further asserts that the 2% low income direct-install mandate would not likely be achievable given aggressive long-term LIURP direct-install activity in its service territory.

For the abovementioned reasons, Duquesne Light opposes the arguments raised by several parties (i.e., Citizens Power, OCA, and Regional Housing) that direct-install measures should in fact be part of the Phase III requirements. Duquesne Light also opposes those that requested that the Commission increase the 2% direct-install requirement to 3% (i.e., CAUSE-PA and Energy Efficiency for All). Duquesne Light maintains that these expectations are unrealistic, and should be adjusted to account for qualified market potential, based on regional end-use saturations and removing potential shared with the long-operating LIURP and DCED low-income weatherization programs.

### 5. Duquesne Light Is Supportive of the Inclusion of Low-Income Savings Resulting from General Residential Programs

Duquesne Light disagrees with CAUSE-PA's comment that the Commission should limit EDCs reporting of low income sector savings toward the 5.5% carve-out to programs serving only low income customers. CAUSE-PA stated that the Commission should prohibit attribution of savings from general residential programs to low income targets. Duquesne Light has low-income participation in its general residential programs, which shows that the general residential programs are serving the low-income customer sector. Duquesne Light has the ability to track the participation of low-income customers within its general residential Act 129 programs. Duquesne Light's Act 129 program tracking system identifies confirmed low income customers that participate in its programs, thus enabling it to accurately report the number of low income sector savings impacts. Duquesne Light thus disagrees with CAUSE-PA's attempt at homogenous treatment of low income sector needs and potential.

However, in the case of upstream programs where rebates are paid directly to manufacturers and distributors to facilitate "instant rebates" discrete customer identification is not possible. Duquesne Light does have the ability to identify low-income participation in another fashion. Duquesne Light's independent evaluator performs population surveys to identify low income sector participation. This random sampling employs SWE approved survey instruments with sample designs implemented to achieve required statistical confidence and precision levels. Duquesne Light can demonstrate the extent of participation by low-income customers in upstream programs.

### 6. Duquesne Light is Opposed to Governmental, Education, Non-profit and Multifamily Carve-outs

Though many consumer advocates support carve-outs in the G/E/NP and Multifamily sectors, Duquesne Light generally opposes carve-outs. Duquesne Light avers that successful Act 129 programs rely upon flexibility, which carve-outs remove. Duquesne Light is very interested in providing programs to these important customer sectors, but would like to provide successful programs as it did in Phase I and Phase II. Such programs require flexibility.

### 7. Duquesne Light Is Opposed to the Reporting of Net Savings

Duquesne Light does not support the reporting of net savings estimate. Duquesne Light disagrees with the preference of the Joint Commentators that net verified savings should be used for compliance with goals. Duquesne avers that the reporting of net savings estimates is problematic. As required by the SWE, EDCs calculate net savings using methodologies specified by the SWE, with which all EDCs did not agree. The SWE, in meetings with the EDCs and their evaluators, has acknowledged that there is substantial disagreement regarding methods to be used in estimating free ridership and spillover, and thus net savings. The SWE's Evaluation Framework characterized net-to-gross estimation as useful when viewed over time to conduct trend analysis or when used for assessment across programs in determining how program net effects differ from one another. The SWE's own 2014 Evaluation Framework states that "Using self-reports to measure free-riders and spillover is subject to bias and therefore may not yield an accurate estimate of free-ridership and spillover; this concern supports the PUC's decision that self-report-based NTG should not be used to calculate net savings estimates for compliance purposes." Thus, Duquesne Light does not support the use of net savings for compliance purposes.

## 8. Duquesne Light Is Opposed to an Opt-Out for Commercial & Industrial Customers

Duquesne Light disagrees with comments that would provide an opt-out for commercial and industrial customers. IECPA averred that because many large C&I customers implemented energy efficiency projects when rate caps were expiring and the Commission ordered two phases of EE&C funding since that time that the remaining projects are more expensive and more difficult to achieve.

Duquesne thus disagrees with IECPA, so long as the Commission imposes Act 129 energy and demand reductions upon the EDCs all customer sectors should be subject to the costs and benefits of the program. The evaporation of lower-hanging fruit does not justify avoiding a voluntary opt-out from its Act 129 demand and energy reduction obligations. However, the record shows that large commercial and industrial customers were active and aggressive participants in programs specifically tailored to meet their needs. Large facility and industrial process projects have rendered significant energy savings that has been verified by independent evaluation and state oversight. Thus, Duquesne Light does not support an opt-out for commercial and industrial customers.

## Conclusion

Duquesne Light appreciates the opportunity to comment on the issues raised regarding the implementation of Phase III of the EE&C Program.

Sincerely,


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