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September 9, 2009

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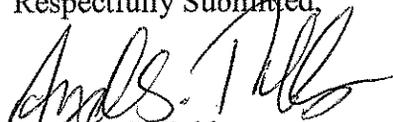
RE: Petition of PPL Electric Utilities Corporation for Approval of an Energy Efficiency and Conservation Plan - Docket No. M-2009-2093216

Dear Secretary McNulty:

Enclosed, for filing, are the original Reply Comments of PPL Electric Utilities Corporation in the above-referenced proceeding.

As indicated on the certificate of service, copies have been provided to the parties in the manner indicated.

Respectfully Submitted,



Andrew S. Tubbs

AST/jl

Enclosures

cc: Honorable Susan D. Colwell
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. Code § 1.54 (relating to service by a participant).

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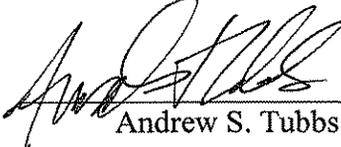
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Date: September 9, 2009



Andrew S. Tubbs

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of an Energy : Docket No. M-2009-2093216
Efficiency and Conservation Plan :

**REPLY COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

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Date: September 9, 2009

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I. INTRODUCTION

On July 1, 2009, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed a Petition with the Pennsylvania Public Utility Commission (“Commission”), pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa.C.S. §§ 2806.1 and 2806.2, requesting approval of an Energy Efficiency and Conservation Plan (“EE&C Plan” or “Plan”). The EE&C Plan includes a broad portfolio of energy efficiency programs, conservation practices and peak load reductions, renewable technologies, and energy education initiatives. These integrated programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129. For the reasons set forth below and in PPL Electric’s Main and Reply Briefs, PPL Electric respectfully requests that the Commission approve the EE&C Plan.

II. PROCEDURAL HISTORY

PPL Electric’s Main Brief filed on August 28, 2009 contains a full description of the procedural history of this proceeding. As relevant to these reply comments, on July 29, 2009, Administrative Law Judge Susan D. Colwell issued a prehearing order in this proceeding establishing a procedural schedule that required comments regarding the EE&C Plan to be filed by August 7, 2009. In accordance with that procedural schedule, comments were submitted by the Office of Trial Staff (“OTS”), Office of Consumer Advocate (“OCA”), The Commonwealth of Pennsylvania, Department of Environmental Protection (“DEP”), UGI Utilities, Inc., UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc. (collectively, “UGI”), Eric Joseph Epstein, EnerNOC, Inc. (“EnerNOC”), Citizens for Pennsylvania’s Future (“PennFuture”), PP&L Industrial Customer Alliance (“PPLICA”), The E Cubed Company, LLC (“E Cubed”) and Keystone HELP. Pursuant to the procedural schedule for this proceeding, reply briefs and reply comments are due on September 9, 2009.

III. DESCRIPTION OF EE&C PLAN

The EE&C Plan includes a broad portfolio of energy efficiency, conservation practices and peak load reductions, and energy education initiatives. See PPL Electric Exhibit 1; PPL Electric Main Brief, p. 4.¹ PPL Electric's portfolio of programs is designed to provide customer benefits and to meet the energy saving and peak load reduction goals set forth in Act 129. In summary, the Plan includes a range of energy efficiency and demand response programs that include every customer segment in PPL Electric's service territory. The Plan addresses each of the requirements in 66 Pa.C.S. § 2806.1(b)(1)(i), as well as the filing requirements contained in the Commission's *Implementation Order*, and follows the template provided in the May 7, 2009 Secretarial Letter at Docket No. M-2008-2069887.

The Plan, as noted above, describes a comprehensive portfolio of energy efficiency, conservation practices and peak load reductions, renewable technologies and energy education initiatives. Specifically, the portfolio consists of the following fourteen (14) programs:

1. Efficient Equipment Incentive Program
2. Residential Energy Assessment & Weatherization
3. Compact Fluorescent Lighting Campaign
4. Appliance Recycling Program
5. ENERGY STAR® New Homes Program
6. Renewable Energy Program
7. Direct Load Control Program
8. Time of Use Rates
9. Energy-efficiency Behavior & Education
10. Low-income WRAP
11. Low-income E-Power Wise
12. Commercial and Industrial Custom Incentive Program
13. HVAC Tune-Up Program
14. Load Curtailment Program

¹ A detailed description of the EE&C Plan is contained in the petition filed on July 1, 2009 and in PPL Electric's Main Brief. The EE&C Plan was admitted into evidence as PPL Electric Exhibit 1.

A full description of each of the fourteen programs is set forth in Section 3 of the EE&C Plan. PPL Electric Exhibit 1, § 3. These programs include a range of energy-efficiency and demand response programs targeted to every customer segment in PPL Electric's service territory.

PPL Electric's portfolio of programs is designed to provide customer benefits and to meet the energy saving and peak load reduction goals set forth in Act 129 within the designated expenditure cap of two percent (2%) of 2006 annual revenues for each year of the four-year plan, which equates to approximately \$246 million. *See* PPL Electric Exhibit 1, §§ 1.1.2, 3.1.1.1. Specifically, PPL Electric's Plan includes measures and programs to achieve PPL Electric's calculated electricity consumption and peak load reduction targets of:

- a. 1% energy savings by 2011, which is 382,000 MWh or 44 average MW;
- b. 3% energy savings by 2013, which is 1,146,000 MWh or 132 average MW; and
- c. 4.5% peak load reduction by 2013, which is 297 MW.²

PPL Electric calculates that approximately six percent (6%) of its total load comes from low-income customers and, therefore, has designed its Act 129 programs to achieve approximately six percent (6%) of its energy consumption and peak load reductions from the low-income sector. PPL Electric Exhibit 1, § 9.1.3. PPL Electric's proposed Plan includes programs to achieve ten percent (10%) of total Plan reductions from institutional facilities, such as local governments, school districts, colleges, and nonprofit organizations. PPL Electric Exhibit 1, § 9.1.2.

² PPL Electric will meet this reduction requirement by September 30, 2012, as required by the Commission's Implementation Order.

IV. REPLY COMMENTS OF PPL ELECTRIC

These reply comments supplement the responses provided by PPL Electric in its Main and Reply Briefs filed in this proceeding. Specifically, these reply comments respond to the comments filed by OTS, OCA, DEP, UGI, Mr. Epstein, EnerNOC, PennFuture, PPLICA, E Cubed and Keystone HELP on August 7, 2009. PPL Electric addresses each party's comments below; however, it is important to note that many of the same issues have already been addressed by PPL Electric in its Main and Reply Briefs. Where the same issue raised by a party in their comment has been addressed by PPL Electric in its Main and Reply Briefs, the Company has provided the appropriate cross reference, instead of repeating statements already filed in this proceeding.

A. THE OFFICE OF TRIAL STAFF

The comments filed by OTS are a short synopsis of the topics addressed in the testimony it filed in this proceeding and the issues raised are similar to those stated in OTS's main brief. *See* OTS St. 1, 2; OTS Main Brief. PPL Electric, via its testimony, Main Brief and Reply Brief, has sufficiently responded to the issues raised by OTS in its comments. The Company will not repeat all of its statements made in response to OTS, however, below are cross references to the pages in PPL Electric's Main and Reply Briefs where the Company addresses the concerns of OTS:

Topics raised by OTS	Pages in the Main Brief and/or Reply Brief Containing PPL Electric's Responses
The Two Percent (2%) Cost Cap	Main Brief, p. 56.
Statewide Evaluator Costs	Main Brief, p. 57.
Allocation Error in Initial Filing Corrected	Main Brief, p. 60.
Double Recovery of Act 129 Costs	Main Brief, p. 63.

Cost Recovery for Plan Years Commencing May 31, 2013	Main Brief, p. 63.
Reconciliation	Main Brief, p. 64.
Amortization Period for Up-Front Costs	Main Brief, p. 65.
Interest Costs Are Part of the EE&C Plan	Main Brief, p. 65.
Asymmetrical Interest Rates	Main Brief, p. 66.

B. THE OFFICE OF CONSUMER ADVOCATE

The comments filed by OCA address substantially similar issues to those raised in OCA’s testimony and main brief filed in this proceeding. *See* OCA St. 1; OCA Main Brief. As with OTS, PPL Electric, via its testimony, Main Brief and Reply Brief has sufficiently responded to the issues raised by OCA in its comments. The Company will not repeat all of its statements made in response to OCA, however, below are cross references to the pages in PPL Electric’s Main and Reply Briefs where the Company addresses the concerns of OCA:

Topics raised by OCA	Pages in the Main Brief and/or Reply Brief Containing PPL Electric’s Responses
Bid Programs in PJM RPM Auction	Main Brief, p. 24.
Fuel Substitution Program for Rate RTS Customers	Main Brief, p. 24.
Post-2013 Direct Load Control Costs	Main Brief, p. 33.
Combined Residential Programs	Main Brief, p. 37.
Statewide Evaluator Costs	Main Brief, p. 57.
Interest Costs Are Part of the EE&C Plan	Main Brief, p. 67.
Continue Stakeholder Process	Main Brief, p. 69.

C. THE COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF ENVIRONMENTAL PROTECTION

The comments filed by DEP are a short synopsis of the topics addressed in its testimony and the issues raised in the comments are similar to those stated in DEP’s main brief filed in this proceeding. *See* DEP St. 1; DEP Main Brief. The Company has sufficiently responded to the issues raised by DEP’s comments through the Company’s testimony, Main Brief and Reply Brief. The Company will not repeat all of its statements made in response to DEP, however, below are cross references to the pages in PPL Electric’s Main and Reply Briefs where the Company addresses the concerns of DEP:

Topics raised by DEP	Pages in the Main Brief and/or Reply Brief Containing PPL Electric’s Responses
ARRA and Act 129 Funding	Main Brief, p. 19; Reply Brief, p. 8.
Fuel Switching – Gas to Electric	Main Brief, p. 25.
Appliance Recycling Program	Main Brief, p. 30.
The Whole Facility Approach	Main Brief, p. 40; Reply Brief, p. 21.
Smart Meters	Main Brief, p. 44.
Distributed Generation	Main Brief, p. 46.
Fuel Substitution - Electric to Gas	Main Brief, p. 46.
Continue Stakeholder Process	Main Brief, p. 69.
Certifications for Contractors	Main Brief, p. 70.
Whole Home Performance Program	Reply Brief, p. 27.

D. UGI UTILITIES, INC., UGI PENN NATURAL GAS, INC. AND UGI CENTRAL PENN GAS, INC.

The comments filed by UGI address substantially similar issues to those raised in UGI's testimony and main brief filed in this proceeding. *See* UGI St. 1; UGI Main Brief. PPL Electric, via its testimony, Main Brief and Reply Brief has sufficiently responded to the issues raised by UGI in its comments. The Company will not repeat all of its statements made in response to UGI, however, below are cross references to the pages in PPL Electric's Main and Reply Brief where the Company addresses the concerns of UGI:

Topics raised by UGI	Pages in the Main Brief and/or Reply Brief Containing PPL Electric's Responses
Fuel Switching - Gas to Electric	Main Brief, p. 25
Fuel Substitution - Electric to Gas	Main Brief, p. 46; Reply Brief, p. 24.

E. ERIC JOSEPH EPSTEIN

The issues raised by Mr. Epstein in his comments are identical to the topics addressed in Mr. Epstein's filed testimony and are substantially similar to the arguments raised in his main brief filed in the proceeding. *Compare* Epstein Comment to Epstein St. 1 and Epstein Main Brief. Because of the considerable similarities between Mr. Epstein's testimony and brief to the comments he filed on August 7, 2009, PPL Electric has sufficiently responded to the issues raised by Mr. Epstein in this proceeding. The Company will not repeat all of its statements made in response to Mr. Epstein, however, below are cross references to the pages in PPL Electric's Main and Reply Briefs where the Company addresses Mr. Epstein's concerns:

Topics raised by Mr. Epstein	Pages in the Main Brief and/or Reply Brief Containing PPL Electric's Responses
Fuel Switching - Gas to Electric	Main Brief, p. 25.
Residential Energy Assessment & Weatherization	Main Brief, p. 27; Reply Brief, p. 14.
Compact Fluorescent Lighting Campaign	Main Brief, p. 30; Reply Brief, p. 14.
ENERGY STAR® New Homes Program	Main Brief, p. 30.
Renewable Energy Program	Main Brief, p. 31.
Air Conditioning Settings	Main Brief, p. 31.
Time of Use Rates	Main Brief, p. 35.
The Distinction Between Education and Marketing	Main Brief, p. 38; Reply Brief, 19.
Multi-Family Dwellings	Main Brief, p. 38.
Low-Income WRAP and USP	Main Brief, p. 39; Reply Brief, p. 20.
Low-Income E-Power Wise	Main Brief, p. 40; Reply Brief, p. 20.
Key Account Managers	Main Brief, p. 41.
Load Curtailment Program	Main Brief, p. 43.
The Two Percent (2%) Cost Cap	Main Brief, p. 56.
Statewide Evaluator Costs	Main Brief, p. 57.
Administrative Costs	Main Brief, p. 59.
Cadmus is a CSP	Main Brief, p. 67
Affiliate CSP	Main Brief, p. 68.
Criticism of Stakeholder Process	Main Brief, p. 69; Reply Brief, p. 29.
The ACR Should Be Included in the Distribution Charge	Main Brief, p. 72.
Low-Income Program Requirements	Reply Brief, p. 4.

F. ENERNOC, INC.

EnerNOC, in its comments, expressed support for the EE&C Plan proposed by PPL Electric and did not recommend any changes to the filed Plan. EnerNOC Comment, p. 6 *et seq.* Specifically, EnerNOC states that it supports several elements of the proposed Load Curtailment Program and commends its focused and cost-effective nature. EnerNOC Comment, p. 6. EnerNOC's comments also express its specific endorsement of certain aspects of the Plan. As discussed in detail in its comments, EnerNOC supports the following aspects of PPL Electric's Plan:

- The proposed utilization of approximately 180 MW of participants averaging 50 hours of interruption each summer as part of the Load Curtailment Program for Large C&I customers, to achieve the peak load reduction target. EnerNOC Comment, p. 6; *see* PPL Electric Exhibit 1, p. 148.
- The proposed coordination of the Load Curtailment Program for Large C&I customers with PJM's demand response programs, including a marketing strategy to encourage customers to participate in these programs. EnerNOC Comment, p. 6; *see* PPL Electric Exhibit 1, p. 149.
- The proposed use of incentives to deliver sufficient levels of capacity to contribute meaningfully toward its Act 129 goals. EnerNOC Comment, p. 7.
- The proposed ramp-up strategy for the Load Curtailment Program. EnerNOC Comment, p. 7; *see* PPL Exhibit 1, p. 150.

G. CITIZENS FOR PENNSYLVANIA'S FUTURE

PennFuture's comments generally focus on two broad topics.³ The first concerns coordination between PPL Electric and other utilities with regard to conservation and efficiency efforts. PennFuture Comment, pp. 2-4. PPL Electric is not opposed to coordinating energy

³ PennFuture also challenges the Commission's determination regarding the allocation of savings for projects that may be jointly funded. This issue was also raised by DEP in this proceeding. As indicated above, with regard to DEP, PPL Electric has already addressed this issue in detail and will not repeat statements already submitted in this proceeding.

efficiency and conservation efforts among utilities, provided the coordination is in the best interest of its customers. The coordination efforts highlighted in PennFuture's comments appear to be statewide efforts undertaken in other jurisdictions, where conservation and efficiency programs are standardized. This was not the approach taken by Act 129. While Act 129 did not mandate standardized programs, PPL Electric recognizes that benefits may result from a statewide coordination effort. As stated with regard to the Residential Energy Assessment & Weatherization Program, PPL Electric plans to adjust this program over time to conform to statewide standards for energy audits, should they develop, to the maximum extent possible within the constraints of Act 129. Therefore, PPL Electric will continue to evaluate the benefits of coordination, and may implement coordinated measures once they have been shown to benefit its customers and assist in meeting the requirements of Act 129.

PennFuture also advocates that PPL Electric should coordinate with state agencies to remain apprised of additional programs so that PPL Electric can further enhance its efforts under Act 129. As stated in the EE&C Plan, PPL Electric will educate customers on the full array of funding mechanisms that are available including PPL Electric's programs, Act 1 programs, and federal tax incentives. PPL Electric Exhibit 1, p. 223. As part of this effort PPL Electric will remain apprised of programs that are available to its customers. PPL Electric does not, however, support the reporting requirement proposed by PennFuture with regard to the currently available funding sources for conservation efforts. As PennFuture itself explains, funding sources for conservation efforts may change almost monthly, and any report submitted by PPL Electric would be outdated shortly after it is filed, therefore such information would not be useful to include in the annual report as it is quickly outdated. Therefore, the PennFuture's recommendations should be rejected.

The second topic raised by PennFuture concerns PPL Electric's efforts to locate additional capital for programs that are not part of its EE&C Plan or pursuant to Act 129. PennFuture Comment, p. 5. PennFuture explains that it does not expect PPL Electric to provide the capital for such programs, but it does expect PPL Electric to attract sources of capital, create channels to its customers, and possibly allow for a collection mechanism (such as on-bill financing). As stated in its Main Brief, PPL Electric objects to on-bill financing. Main Brief, p. 43. Furthermore, PPL Electric does not support the activities that PennFuture avers PPL Electric should have to engage in to solicit capital. Regarding the EE&C Plan, PPL Electric has designed the Plan to achieve its projected customer participation levels (and its reduction targets) without the additional cost and complexity of a customer financing program. Moreover, there are other entities (*i.e.* non-EDCs) that currently provide financing for customers, including low-interest financing for energy efficiency projects. For example, the Sustainable Energy Fund successfully provides this type of financing. Financing should continue to be provided by those companies who have that core business, focus, infrastructure, and expertise and EDCs should not interfere with this process. Therefore, PennFuture's recommendation regarding raising capital should be rejected.

H. PP&L INDUSTRIAL CUSTOMER ALLIANCE

The comments filed by PPLICA address substantially similar issues to those raised in PPLICA's main brief filed in this proceeding. *See* PPLICA Main Brief. PPL Electric, via its testimony, Main Brief and Reply Brief has sufficiently responded to the issues raised by PPLICA in its comments. The Company will not repeat all of its statements made in response to PPLICA, however, below are cross references to the pages in PPL Electric's Main and Reply Briefs where the Company addresses the concerns of PPLICA:

Topics raised by PPLICA	Pages in the Main Brief and/or Reply Brief Containing PPL Electric's Responses
The Two Percent (2%) Cost Cap	Main Brief, p. 56.
Statewide Evaluator Costs	Main Brief, p. 57.
Cost Recovery Through Demand Charge Mechanism	Reply Brief, p. 30.
PJM Peak Load Contribution	Reply Brief, p. 30.
Cost Recovery for Plan Years Commencing May 31, 2013	Main Brief, p. 72.
Separate Line Item For ACR	Main Brief, p. 72.

I. THE E CUBED COMPANY, LLC / NATIONAL ASSOCIATION OF ENERGY SERVICE COMPANIES

E Cubed filed its comments on behalf of the National Association of Energy Service Companies (“NAESCO”). NAESCO recommends that the Pennsylvania Guaranteed Energy Savings Agreement (“GESA”) program should be the primary delivery vehicle for PPL Electric’s government buildings programs instead of a Conservation Services Provider (“CSP”). E Cubed Comment, p. 3. The GESA program, according to NAESCO, is administered by the Pennsylvania Department of General Services (“DGS”), which has developed and refined program procedures and documents, and the Penn State Facilities Engineering Institute (“PSFEI”) provides technical assistance to customers. *Id.*, p. 5. NAESCO concludes that PPL Electric, and other utilities should simply contribute resources to enhance the capabilities and the reach of the GESA program. *Id.*, p. 4.

NAESCO’s proposal should be rejected. This proposal by NAESCO is essentially to abandon the competitive procurement process contained in the EE&C Plan. NAESCO is advocating that instead of using CSPs, PPL Electric must sole source DGS and PSFEI to provide

technical and administrative services to institutional customers without any sort of competitive award process. This is inconsistent with the EE&C Plan because PPL Electric contemplates that CSPs will be competitively chosen.

Moreover, the EE&C Plan does not prohibit customers from using energy service companies and, in fact, the Custom Incentive Program supports the guaranteed energy savings contracts offered by energy services companies. PPL Electric St. 1-R, p. 10. It is PPL Electric's position that each customer should have the opportunity to choose the type of energy efficiency measures that are most appropriate for that customer. PPL Electric St. 1-R, pp. 9-10. PPL Electric's EE&C Plan allows customers to choose individual measures such as lighting, controls, and HVAC equipment or to select a "whole facility" approach through its Custom Incentive Program, or by applying many-to-all measures in the Efficient Equipment Program, to maximize the depth of savings. *Id.* NAESCO proposal would essentially remove these individual choice measures from the Plan. DEP raised similar arguments to those raised by NAESCO in its testimony and main brief. As noted above, PPL Electric has already addressed these issues in detail.

J. KEYSTONE HELP

The comments of Keystone HELP appear to be directed at all electric distribution companies that have filed conservation plans pursuant to Act 129. Keystone HELP does not address any specific program or proposal submitted by PPL Electric in this proceeding. Keystone HELP does maintain that it is important that the utility conservation programs not only be compatible with Keystone HELP, but that Keystone HELP be aggressively supported by the utilities. Keystone HELP Comment, p. 2. Keystone HELP makes three requests regarding a utility's efforts under Act 129.

First, Keystone HELP expresses concern regarding the potential for customer confusion because of varying programs and equipment standards. Keystone HELP Comment, p. 2. PPL Electric believes that any customer confusion will be alleviated by the joint efforts of PPL Electric and entities with complementary programs. The EE&C Plan states that PPL Electric has established relationships with non-profit and community outreach organizations that provide complementary programs to customers in PPL Electric's service territory. These include the Pennsylvania Housing Finance Authority, which delivers a multifamily efficient equipment loan program directed primarily to low-income customers, and Keystone HELP, which offers Home Performance with ENERGY STAR® residential audits, incentives on some energy efficient technologies, and financing for energy-efficiency products and services. PPL Electric Exhibit 1, p. 181. Moreover, PPL Electric and these organizations have agreed to engage in an active co-marketing effort to help direct customers to appropriate energy-efficiency programs and incentives, regardless of which company or organization receives the benefits. *Id.* This co-marketing effort will alleviate any customer confusion and will help customers choose the best energy-efficiency programs and incentives for their particular needs. In addition, and as stated above, PPL Electric plans to adjust the Energy Assessment & Weatherization Program over time to conform to statewide standards for energy audits, should they develop, to the maximum extent possible within the constraints of Act 129, thereby eliminating any potential for confusion about programs and equipment standards. PPL Electric Exhibit 1, p. 48.

Second, Keystone HELP maintains that utilities should be encouraged to incorporate Keystone HELP in marketing initiatives. As noted above, PPL Electric anticipates working with Keystone HELP on marketing activities. In addition to the co-marketing effort described above, PPL Electric's Plan provides that it will coordinate marketing opportunities with key market

partners, such as Keystone HELP, and the Pennsylvania Housing and Finance Authority, as part of its Efficient Equipment Incentive Program. PPL Electric Exhibit 1, p. 48.

Third, Keystone HELP states that utilities should be encouraged to actively support Keystone HELP financially. While it is important to encourage companies to provide financial assistance to non-profit and community outreach organizations, this should not be a requirement under Act 129. A mandatory requirement under Act 129 to provide assistance to a particular non-profit or community outreach organization (such as Keystone HELP) should not be permitted. Moreover, the requested financial assistance is outside the scope of this proceeding, and Keystone HELP has provided no evidence to suggest that financially supporting Keystone HELP will assist the Company to meet its targets under Act 129.

V. REVISIONS TO THE EE&C PLAN

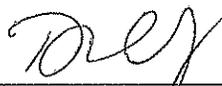
Various parties in this proceeding have suggested modification to PPL Electric's EE&C Plan. PPL Electric has agreed to consider certain modifications to the Plan; however, given the compressed procedural schedule, the integrated nature of the Plan and Act 129's spending constraints PPL Electric is not proposing specific revisions to the Company's Plan at this time.⁴ While not proposing revisions at this time, PPL Electric has agreed to consider and/or work with the parties as to their issues and remains open to the prospect of revising the Plan to address certain concerns raised by the parties. PPL Electric's proposal concerning updates to the Plan is contained in its Main Brief (p .73). For example, through this process, PPL Electric anticipates considering, *inter alia*, the following topics: increasing the participant levels of certain programs; bid solicitation for demand response CSPs; and the ability of PPL Electric's CSP(s) for the Act 129 demand response programs to bid peak load reductions into the PJM's RPM auction.

⁴ PPL Electric does note that its initial filing contained an allocation error which has been addressed. *See* PPL Electric Main Brief at p. 60.

VI. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation requests that the Commission give due consideration to these reply comments, and for all the reasons stated above and in the Company's Main Brief and Reply Brief filed in this proceeding, the Energy Efficiency and Conservation Plan of PPL Electric Utilities Corporation should be approved.

Respectfully submitted,



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