

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

December 28, 2009

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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 Comments of the Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "James A. Mullins".

James A. Mullins
Assistant Consumer Advocate
PA Attorney I.D. # 77066

Enclosures

cc: Honorable Susan D. Colwell
Office of Special Assistants

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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 :

COMMENTS
OF THE
OFFICE OF CONSUMER ADVOCATE

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Dated: December 28, 2009

I. INTRODUCTION

On December 16, 2009, PPL Electric Utilities Corporation (PPL or Company) filed its Amended Energy-Efficiency and Conservation Plan (EE&C Plan) with the Pennsylvania Public Utility Commission (PUC or Commission). The Amended EE&C Plan was filed in accordance with the Commission's October 26, 2009 Order in this proceeding which approved, with modifications, PPL's originally filed July 31, 2009 EE&C Plan. In general, the amended EE&C Plan comports with the Commission's Order, but as set forth below, the OCA submits that some minor modifications or clarifications may be necessary.

II. COMMENTS

1. Updating the EE&C Plan

At page 26 of the EE&C Plan, PPL states that, in devising the EE&C Plan, the Company relied on several technical, economic and market assumptions. The Company further states that: "Over the life of the Plan, PPL Electric expects that many of these assumptions will have to be revisited, refined, and, where necessary, revised to reflect updated market conditions, variations from the Plan's estimates, customer preferences, experience in Pennsylvania or other states, cost-effectiveness, new technologies and practices, new state or federal energy standards, results of the annual reviews, and for other factors." The phrase "results of the annual reviews" is included in the amended EE&C Plan, but the OCA submits that the phrase "and the five-year review" should also be added. This change would be in compliance with the Commission's October 26, 2009 Order which states that: "PPL Electric Utilities Corporation shall identify necessary adjustments to its Plan based on the results of the annual and five-year reviews as required by Act 129,66 Pa. C.S. § 2806.1(b)(2)". Order at p. 112.

2. Cost Assignment to Individual Customers

The Commission's Order denies PPL's request to directly assign Efficiency and Conservation costs to an individual customer. Order at p. 113. Therefore, in accordance with the Commission's Order, PPL should clarify that it will not directly assign Energy Efficiency and Conservation costs to individual customers participating in the programs.

3. Definition of Administrative Costs

In section 4.2.2 of the revised Plan, the Company inserted a definition of administrative costs. The OCA submits that this definition is overly broad and could facilitate the recovery of costs that were not defined as administrative costs in the July 31, 2009 EE&C Plan. As this change does not appear to be required by the Commission's Order, it should be removed.

4. Act 129 Compliance Rider

PPL should provide the supporting workpapers for its proposed residential Act 129 Compliance Rider (ACR) rates, so that the Commission and other interested parties can review these documents.

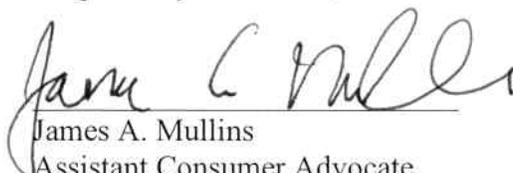
5. Allocation of Common Costs

PPL revised Tables 3, 5, 7, 136, and 137 of the EE&C Plan in order to correct the allocation of common costs. The OCA submits that the supporting workpapers for the revised allocations should be provided by the Company to permit the Commission and interested parties to examine the details of the allocations.

III. CONCLUSION

Wherefore, the OCA submits that the Company's EE&C Plan be modified in accordance with these Comments.

Respectfully Submitted,



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Dated: December 28, 2009
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CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, Comments of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 28th day of December 2009.

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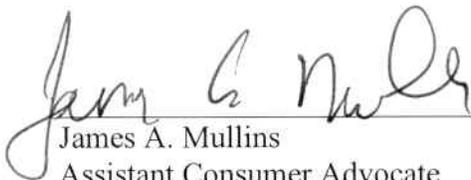
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