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Gary A. Jack Assistant General Counsel

April 16, 2010

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VIA OVERNIGHT MAIL

James J. McNulty, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building, 2nd Floor 400 North Street Harrisburg, PA 17120 PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Re:

Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation and Demand Response Plan Docket No. M-2009-2093217

Dear Secretary McNulty:

Duquesne Light Company ("Duquesne") submits a correction to its Energy Efficiency Plan approved by the PUC on October 27, 2009 in the above case. On pages 74 and 75 of the Plan, pricing credits were inadvertently copied from one section and placed in the large commercial/industrial demand response section. It resulted in prices that are clearly insufficient for a large commercial/industrial demand response program. Exhibit A shows the proposed deletion of the error and insertion of the correct language. Exhibit B is a clean version of that page.

Duquesne does not request any specific action by the Commission to the submittal since it merely corrects an error.

Sincerely yours,

Gary A. J

Enclosure

cc:

ALJ Nene

All Parties on the Certificate of Service

PA PUBLIC UTILITY COMMISSION

interruptions will be called for annually. Participants receive the control or communication systems facilitating load reductions at a reduced price and are paid incentives based on recorded reductions. Reduction periods are selected based upon an assessment of the current wholesale energy prices.

Implementation Strategy: The program will be delivered under contract with a third party experienced in implementing load management programs. The contractor will at least be responsible for such activities as, acquiring and inventorying equipment for installation, hiring and training of installation and service technicians, arranging equipment installation; communicating with equipment during cycling events, and handling customer service issues. The contractor may also be engaged more broadly, such as direct marketing; managing call centers for customer inquiries, installation and service; operating cycling events when called by the utility, and monitoring and verifying performance. All Large C & I customers and their authorized third parties, including Curtailment Service Providers in PJM will be given equivalent incentives to participate in the Duquesne program, equivalent access to customer usage data, and equivalent facilities paid for through the EEC&DR surcharge to implement this program. Customers can then choose to participate or not, without restriction.

<u>Program Risk and Risk Management Strategy</u>: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warning regarding program under- or over-subscription. Provisions in CSP contract language provides for fund shifting from under-performing programs.

<u>Anticipated Cost to Participating Customers</u>: Participants receive the communications system at half-price

Ramp-up Strategy: The program will not operate in 2009. Some administrative costs will be incurred preparing program launch in 2010. Program projected participation is 18 participants per year, 2010 through 2012.

Marketing Strategy: The program will be promoted through a variety of strategies, including direct mail, telemarketing, and door to door sales; existing utility resources, including bill inserts, websites, customer service call center representatives. Special literature will be prepared for use in direct mail, door hangers, public meetings, and response to customer inquiries. Media events will be held for radio, television and newspapers. There will be presentations at public meetings such as civic clubs, church groups, and neighborhood associations. Per the Commission's Opinion and Order entered October 27, 2009 at Docket No. M-2009-2093217, marketing procedures will be subject to periodic Commission review.

Eligible Measures and Incentives: Participants will be paid for performance on the basis of load reductions when called upon for curtailment events. The amount will be determined through an open and fair competitive selection process as part of a request for proposals for load reductions. A budget has been established for the payment of incentives covering the program years of May 31, 2010 through May 31, 2013. The ultimate amount paid to participants

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2012

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will be determined by the competitive results of the energy market place as reflected in the responses to the request for proposals. Participants will receive the communication and control technologies—at a reduced price. Customers will receive credits on their monthly electric bill for participation amounting to \$32 per summer season. This is based on an incentive of \$8/month for each of the four summer months.

<u>Program Start Date and Key Milestones</u>: Refer to Section Chart 3, Large Commercial/Industrial Portfolio Program.

Assumed EM&V requirements to document savings by the Commission's statewide EE&C Evaluator: Detailed evaluation, measurement and verification activities are identified in the EEC & DR Study and the EM&V Related Program Content section, where there is a complete listing of the information that will be provided to the Commission's statewide EE&C Evaluator.

Administrative Requirements: Program administrative budgets are based on benchmarking of similar programs, administrative and incentive costs shown the Projected Program Budget table below. Organization planning assumes administrative duties will performed by the Duquesne Light program manager for the C&I sub-contract programs as well as part-time support by engineering, marketing, purchasing, data processing and clerical staff, in addition to contracted CSP services.

<u>Estimated Participation:</u> Projected participation rates for years 2009 through 2012 are shown below:

Figure 39: Demand Response Projected Participation Rates

Year	2009	2010	2011	
Participants per Year	0	18	18	
Participants Cumulative	0	18	36	



APR 1 6 2010 PA PUBLIC UTILITY COMMISSION SECRETARY'S RIPEY interruptions will be called for annually. Participants receive the control or communication systems facilitating load reductions at a reduced price and are paid incentives based on recorded reductions. Reduction periods are selected based upon an assessment of the current wholesale energy prices.

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Participants per Year	0	18	18	18
Participants Cumulative	0	18	36	54

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the correction to the EEC&DR Plan has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA FIRST-CLASS MAIL AND/OR E-MAIL

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Dated April 16, 2010

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