March 7, 2011

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  

RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Expedited Approval of Amendments to the Residential HVAC Program and Governmental &Institutional Components of the C/I Equipment Programs  
Docket Nos. M-2009-2092222  
M-2009-2112952  
M-2009-2112956  

Dear Secretary Chiavetta:

Enclosed for filing is the Answer 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,

Aron J. Beatty  
Assistant Consumer Advocate  
PA Attorney I.D. # 86625  

Enclosure  
cc: Administrative Law Judge  
Office of Special Assistants  

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On February 18, 2011, the Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company (the FirstEnergy Companies) filed two Joint Petitions concerning their Energy Efficiency and Conservation (EE&C) plans. In both Petitions, the Companies requested Commission approval to modify their EE&C plans. The Companies separated their requested modifications into two petitions due to the pressing need to make some, but not all, of their proposed modifications in time for implementation in the Spring of 2011. The Companies have termed the petitions as the “Expedited Petition”\(^1\) and the “Main Petition.”\(^2\)


Both Petitions are supported by testimony filed with the Main Petition. The Office of Consumer Advocate (OCA) has reviewed both Petitions and is filing this Answer to the Expedited Petition. The OCA will file a separate Answer to the Main Petition.

The OCA does not object to allowing the Companies to move forward with the changes to the residential program proposed in the Expedited Petition at this time. The Companies’ rationale for seeking expedited treatment of certain residential Plan modifications appears to be reasonable. The Companies have requested permission to enhance their HVAC tune-up program for residential customers. Companies’ witness Fitzpatrick testified that studies have shown that most HVAC tune-ups occur in the spring before the start of the summer cooling season. See, FirstEnergy St. 1 at 17. In order to maximize the results from the HVAC tune-up program, Mr. Fitzpatrick testified that the program must launch by April 1, 2011. Id. The HVAC tune-up change will be implemented within the already approved budgets and will not impact any customer’s rates. Petition at ¶9. The OCA does not object to making this change on an expedited basis.3

The OCA further submits that expedited review is reasonable at this time because the Commission and parties will have an opportunity to address the proposed changes in the Main Petition proceeding that will follow the Expedited Petition. The OCA submits that the issues addressed in the Expedited Petition should be open to further review and analysis, if needed, in the Main Petition proceeding. Given the opportunity to more thoroughly review any

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3 In addition to the HVAC tune-up modification, the Companies propose to make two additional changes. First, the Companies propose to add an Energy Conservation Kit offering to Governmental and Institutional customers within the small C/I equipment program. Petition at ¶5. Second, the Companies propose to increase the Government and Institutional incentive levels to be consistent with those offered in both the Large and Small Commercial and Industrial customers’ equipment programs. Petition at ¶6. The Companies state that these changes will be made within each programs existing budget. Petition at ¶9. The OCA does not have any objection to these proposed changes at this time.
modifications in the Main Petition proceeding, the OCA does not object to approval of the Expedited Petition at this time.

Respectfully Submitted,

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Dated: March 7, 2011  
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CERTIFICATE OF SERVICE

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Expedited Approval of Amendments to the Residential HVAC Program and Governmental & Institutional Components of the C/I Equipment Programs


I hereby certify that I have this day served a true copy of the foregoing document, Answer 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 7th day of March 2011.

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