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**Comments on PECO Energy Company's  
Petition for Approval of Changes to its Act 129 EE&C Plan**

**Docket No. M-2009-2093215**

The Keystone Energy Efficiency Alliance (KEEA), a trade association of energy efficiency companies and organizations across Pennsylvania respectfully comments on PECO Energy Company's Petition for Approval of Changes to its Act 129 EE&C plan.

First, KEEA would like to commend PECO on designing and implementing a set of programs for its electric customers which has resulted in such cost effective savings and which has met the savings targets of Act 129 so far ahead of schedule. This is a tremendous accomplishment which has produced significant financial savings for PECO customers. These programs have taken full advantage of the abundant "low hanging fruit" of relatively easy, extremely inexpensive energy savings which is available in every customer class.

PECO's programs, together with other complimentary efforts in southeastern Pennsylvania have developed a much broader customer awareness of energy conservation and efficiency, as demonstrated by the rising demand for energy efficiency products and services throughout PECO's territory.

This petition has been filed as a result of PECO's success in these programs and because PECO is on pace to meet the second Act 129 goal of 3% of baseload and 4.5% of peak load savings way ahead of the May 2013 deadline. The Pennsylvania Public Utility Commission is aware that PECO and possibly other electric utilities will meet their Act 129 goals ahead of schedule, and is apparently planning to open an investigation into Act 129 in just another month or two this fall. As a result of the investigation, the Commission could extend Act 129 and provide additional energy saving targets out beyond 2013.

The petition which PECO has filed calls for the elimination of rebates on a broad range of appliances and measures, including dishwashers, windows, insulation, and EnergySTAR televisions. PECO also seeks to create a waiting list for commercial customers in order to avoid making commitments to support savings which might exceed its target. Unfortunately PECO has not provided adequate documentation to support its statements about the cost effectiveness of specific measures such as roof insulation, white roof coatings and appliances.

In a nut shell, PECO is shrinking its programs because it has been so successful and is way ahead of schedule.

Customers like the programs, are participating at higher levels than anticipated, and electricity customers are saving money, and building demand for future savings. This is exactly what Act 129 is intended to do. PECO has worked very hard in the last two years to create customer awareness of the value of energy efficiency and conservation, and has built consumer confidence in the products and services. This in turn is building momentum and market transformation is beginning to occur.

There is tremendous risk in cutting back these programs to a significant extent at the present time. It will signal to PECO customers that the programs are coming to an end, and create confusion in the marketplace. As there are complimentary efforts in the PECO service territory such as the EnergyWorks program, which is a residential and commercial building energy retrofit program funded by the U.S. Department of Energy, such a significant reduction in the Act 129 program will have a very negative impact on these complimentary programs as well. The market for energy efficiency is at a very early stage in Pennsylvania, and requires stability and consistency of effort in order to develop and thrive.

It is also important to remember that PECO customers have seen their rates increase three times in the last seven months. This is hardly the time to eliminate critical energy and money saving programs available to all customer classes. To do so would cause economic harm to southeastern Pennsylvania.

KEEA respectfully urges the Commission to defer action on PECO's Petition until after its investigation into the future of Act 129 is concluded. It is premature to make any decision on PECO's program at this time, because in less than two months the Commission will be opening an investigation into Act 129 to make a more long term decision which will determine the immediate future of PECO's EE&C Plan and Programs.

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