

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 5, 2012

Rosemary Chiavetta, 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 Chiavetta:

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, appearing to read "James A. Mullins".

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

Enclosures  
cc: Certificate of Service  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation                   :                   Docket No.    M-2009-2093216  
Energy-efficiency and Conservation Plan       :

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COMMENTS OF THE  
OFFICE OF CONSUMER ADVOCATE  
TO THE PETITION OF  
PPL ELECTRIC UTILITIES CORPORATION

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I.       INTRODUCTION

On February 2, 2012, PPL Electric Utilities Corporation (PPL or Company) filed a Petition with the Pennsylvania Public Utility Commission (PUC or Commission) seeking approval of proposed modifications to the Company's Energy Efficiency and Conservation Plan (EE&C Plan or Plan). According to the Company's instant Petition, there are 56 proposed "minor" changes and 6 "non-minor" changes. Further, the Petition states that the total projected cost of the EE&C Plan decreased by approximately \$5 million (2%) while the direct cost per kWh/yr savings stayed the same for the portfolio (approximately \$0.16 per kWh/yr). However, the projected energy savings for the EE&C Plan decreased approximately 91,000 MWh/yr (6.6%) and the projected peak load reductions for the EE&C Plan decreased approximately 61 MW (16%). If the proposed minor and non-minor changes are not implemented, the Company states that it will not likely achieve its overall 2012 and 2013 projections. Specifically, the Company anticipates a minimum shortfall of 86,251 MWh/yr.

The Pennsylvania Office of Consumer Advocate (OCA) has been an active party in these proceedings since the Company first filed its initial EE&C Plan with the Commission on July 1, 2009. Based on its analysis of the Company's instant Petition, the OCA does not object to the proposed Plan modifications for residential customers.

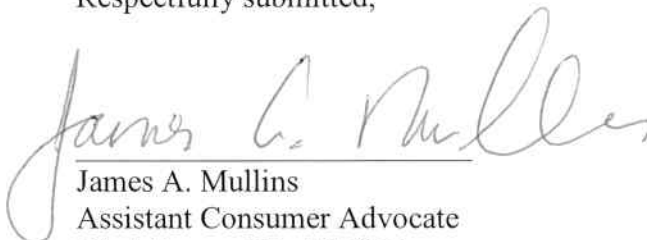
## II. COMMENTS

With respect to the Residential sector, the projected savings increased approximately 92,000 MWh/yr (20%) with a projected cost increase of \$2.8 million (5%). Approximately \$800,000 of the \$2.8 million is the result of an increase in direct program costs. The remaining \$2 million is the result of an increase in common cost allocation to the Residential sector. Further, the Company is deleting its time-of-use program from the EE&C Plan. However, as part of its default service requirements, the Company will continue to offer time-of-use rates to all customers that have been provided with a smart meter. According to the Company, the anticipated savings to be achieved by the Small Commercial & Industrial sector are lower than PPL's original estimates. Conversely, the Residential and Large Commercial & Industrial customer sectors have shown significantly more interest in energy efficiency programs than anticipated. As a result, the Company states that the reduced Small Commercial & Industrial savings estimate requires an adjustment in the anticipated savings and cost contribution from the Small Commercial & Industrial sector to the Residential and Large Commercial & Industrial sector. Based on its analysis of the Company's minor and non-minor proposed changes, the OCA submits that the end result for the Residential sector—a projected \$2.8 million cost increase and the additional energy savings for residential customers—is not unreasonable at this time.

### III. CONCLUSION

WHEREFORE, the Office of Consumer Advocate submits that it does not object to PPL's proposed modifications to its EE&C Plan for residential customers.

Respectfully submitted,



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Dated: March 5, 2012  
00153176

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 5<sup>th</sup> day of March 2012.

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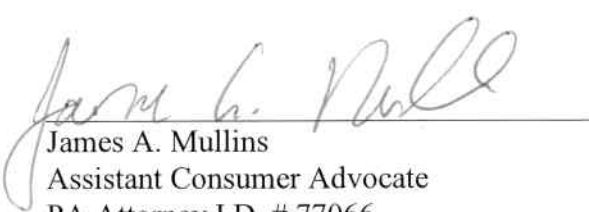
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