

PENNSYLVANIA UTILITY LAW PROJECT

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March 5, 2012

Via E-Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Energy
Efficiency and Conservation Plan**

Docket No. M-2009-2093216

Dear Secretary Chiavetta:

Please accept for filing in the above captioned proceeding an the Comments of Pennsylvania Communities Organizing for Change d/b/a Action United, Inc. ("PCOC") to PPL's Petition for Approval of its Act 129 Energy Efficiency and Conservation Plan. All parties to this proceeding received notice of these filings via electronic mail.

Thank you for your assistance, and please feel free to contact me directly should you have any questions.

Very truly yours,



Harry S. Geller, Esq.
Counsel for PCOC

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have today served a true copy of the foregoing documents upon the parties of record in this proceeding listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Dated: March 5, 2012

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

COMMENTS OF PENNSYLVANIA COMMUNITIES ORGANIZING FOR CHANGE
("PCOC")

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Dated: March 5, 2012

INTRODUCTION

This proceeding concerns amendments proposed by PPL Electric Utilities Corporation (“PPL” or “Company”) to its Act 129 Energy Efficiency and Conservation (“EE&C”) plan pursuant to the requirements of Act 129 of 2008, P.L. 1492 (“Act 129”), 66 Pa.C.S. §§2806.1-2806.2.

Pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) Final Order on the Energy Efficiency and Conservation Program docket, Docket No. M-2008-2069887, adopted June 9, 2011, interested parties have thirty (30) days from the date of the filing to submit comments and/or an answer to such a petition. These comments are submitted by Pennsylvania Communities Organizing for Change d/b/a/ ACTION United (“PCOC”) as an interested stakeholder and participant in the prior proceedings at this docket.¹ PCOC’s interest in this proceeding derives from the impact the proposed amendments will have upon low-income customers residing in PPL’s service territory.

PCOC is comprised of low- and moderate-income Pennsylvanians working to build power through organizing communities to win changes on the issues that are important to them. PCOC thanks the Commission for this opportunity to provide these comments.

COMMENTS

Proposal to add Heat Pump Water Heaters to WRAP and adjust WRAP Projected Savings and Participation

In its Petition to amend its EE&C Plan, PPL proposes to add Heat Pump Water Heaters as an eligible measure for low-income Winter Relief Assistance Program (WRAP) projects. At a

¹ See Final Order Re: Energy Efficiency and Conservation Program, Docket No. M-2008-2069887, (Order entered on June 10, 2011).

low-income stakeholder meeting held on February 9, 2012, representatives from PPL indicated that the addition of this measure would not detract from other measures available to low-income households but rather would be an additional measure available to those households who could take advantage of a heat pump water heater. Although PPL estimates that the percentage of WRAP jobs in which a heat pump water heater could be installed is very low, PCOC supports the addition of this available measure for low-income households as a means of reducing consumption, and therefore cost, to those households for whom this measure is appropriate.

PPL also proposes to reduce its projected participation levels in Act 129 funded WRAP from 23,590 households to 14,590 households. At the February 9, 2012 low-income stakeholder meeting, PPL representatives explained that this reduction of 9,000 households was due to the fact that it underestimated the number of households which would need full-cost WRAP (i.e., customers who use electric heat and use electric heat at their primary heating source) in that more households than it anticipated needed these costlier, yet deeper, measures. Because the cost of full-cost WRAP – as opposed to base load only measures – is more expensive the number of households had to be adjusted downward to allow the program to remain within budget. PPL also indicated that the number of WRAP jobs performed in Year 1 was lower than it anticipated and so part of the overall reduction accounts for this as well.

While PCOC generally disfavors reducing the number of households served by Act 129 funded weatherization services, it accepts PPL's explanation for the reduction of households. Furthermore, it was and is appropriate for PPL to prioritize those households for full-cost WRAP because these households have highest electric energy usage due to the fact that electricity is their primary heating source. Serving fewer households more deeply will make a more significant impact both in terms of overall kWh savings as well as affordability.

Thus, while PCOC accepts PPL's stated reason for the decrease in the number of households served by Act 129 WRAP, it encourages PPL to continue to prioritize the provision of full weatherization measures for eligible households.

CONCLUSION

In conclusion, PCOC thanks the Commission for the opportunity to submit these comments and encourages the Commission to continue its efforts to ensure low-income families receive satisfactory levels of service through the Act 129 EE&C plans.

Respectfully submitted,



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