

Kathy J. Kolich
Senior Corporate Counsel330-384-4580
Fax: 330-384-3875

May 15, 2012

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VIA OVERNIGHT FEDERAL EXPRESSRosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

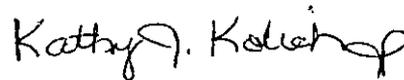
Re: Docket No. M-2009-2093218:
West Penn Power Company's Request for Expedited Approval of
Proposed Minor EE&C Plan Changes Pursuant to the June 10, 2011
Final Order in Docket No. M-2008-2069887

Dear Secretary Chiavetta:

Enclosed for filing are an original and three (3) copies of West Penn Power Company's Request for Expedited Approval of Proposed Minor EE&C Plan Changes Pursuant to the June 10, 2011 Final Order in Docket No. M-2008-2069887.

Please date stamp the copy and return to me in the enclosed, postage-prepaid envelope. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Kathy J. Kolich

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**West Penn Power Company's Request for
Expedited Approval of Proposed Minor
Act 129 EE&C Plan Changes Pursuant to
the June 10, 2011 Final Order in Docket
No. M-2008-2069887**

Docket No. M-2009-2093218

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

**WEST PENN POWER COMPANY'S REQUEST FOR EXPEDITED APPROVAL OF
PROPOSED MINOR EE&C PLAN CHANGES PURSUANT TO THE JUNE 10, 2011
FINAL ORDER IN DOCKET NO. M-2008-2069887**

**Kathy J. Kolich
Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(330) 384-4580 - Telephone
(330) 384-3875 - Fax
kjkolich@firstenergycorp.com**

Dated: May 15, 2012

**Counsel for:
West Penn Power Company**

INTRODUCTION

Pursuant to the Pennsylvania Public Utility Commission's ("Commission"), Final Order dated June 10, 2011 in *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887 (June 10 Order), West Penn Power Company ("West Penn" or "Company") hereby requests expedited approval of its proposed minor changes to the demand response programs included in its Amended Act 129 Energy Efficiency and Conservation ("EE&C") Plan, which was recently approved on May 10, 2012 in Docket No. M-2009-2093218. Specifically, through this request, West Penn is proposing to expand the budget for the Customer Resources Demand Response Program ("CRDR Program") by:

- Removing the Distributed Generation Program ("DG Program") and transferring the funds, \$808,477, from that program to the CRDR Program;
- Reducing the Customer Load Response Program ("CLR Program") budget by \$1,343,650 and transferring those funds to the CRDR Program; and
- Reducing the Commercial and Industrial ("C&I") Large Equipment Program budget by \$609,324 and transferring those funds to the CRDR Program.

A red-line version of the relevant portions of West Penn's currently approved EE&C Plan, including the appropriate tables and appendices, that illustrates the afore-mentioned changes is attached as Exhibit A.

The proposed minor changes qualify for expedited approval as outlined in the June 10 Order. As discussed below, the need for the program changes described herein is immediate. Therefore, West Penn respectfully requests that the Commission staff approve the proposed minor changes described herein consistent with the timelines set forth in the Commission's June 10 Order.

In support of its proposed changes, West Penn offers the following:

BACKGROUND

A. Initial Plan Filings

1. West Penn filed its original EE&C Plan on July 1, 2009. On October 23, 2009, the Commission entered an Order in this case approving in part and rejecting in part West Penn's original EE&C Plan. The Commission ordered West Penn to submit a revised EE&C plan within 60 days.
2. West Penn timely submitted a revised EE&C Plan ("Revised Plan"). By Opinion and Order dated March 1, 2010, the Commission approved in part and rejected in part the Revised Plan. The Commission ordered West Penn to submit a further revised EE&C plan within 60 days and permitted implementation of the non-rejected portions of the Revised Plan.
3. On April 29, 2010, pursuant to the Commission's March 1, 2010 directive, West Penn filed another revised EE&C plan ("Second Revised Plan"). On June 23, 2010, the Commission entered an Order approving West Penn's Second Revised Plan.
4. On September 10, 2010, in accordance with the September 1, 2010 Secretarial Letter, West Penn filed a Petition for Approval of its Amended EE&C Plan ("First Amended Plan").¹
5. On December 17, 2010, Administrative Law Judges Dennis J. Buckley and Elizabeth H. Barnes recommended that the Commission approve the Joint Stipulations and First Amended Plan as modified by the Joint Stipulations.

¹ In the proceedings related to the September 10, 2010 plan filed by West Penn, the Administrative Law Judges referred to the September 10, 2010 filing as the "Second Amended Plan." However, for purposes of this Petition, the Company will refer to the September 10th plan as the "First Amended Plan."

6. On January 13, 2011, the Commission accepted the Administrative Law Judges' recommended decision and approved the First Amended Plan as modified by the *Joint Stipulations*.
7. On August 11, 2011, West Penn submitted a Second Amended Plan (hereinafter, "Current Plan"), which was approved by the Commission on May 10, 2012.

B. June 10 Order

8. The June 10 Order provides for an alternative process for Commission review of minor changes to EE&C Plans.
9. First, Electric Distribution Companies ("EDCs") must file proposed changes with the Commission.
10. Interested parties have 15 days to comment on the filing. Reply comments are due 10 days after the initial comments.
11. Within 35 days after filing the proposed minor changes, the Commission Staff must issue a Secretarial Letter approving or disapproving some or all of the proposed changes and may also refer some or all of the proposed changes to the Office of Administrative Law Judge.
12. The June 10 Order only requires West Penn to file sufficient documentation to support the proposed minor EE&C Plan changes, to include the affected pages of the plan, a redlined version of the affected pages and an explanation of how the proposed minor changes affect the previously approved plan. In addition, the Commission requires an EDC to post a complete redlined version of its proposed plan on its website for public inspection upon filing.
13. The scope of plan changes eligible for expedited approval are:

- The elimination of a measure that is underperforming, no longer viable for reasons of cost-effectiveness, savings or market penetration or has met its *approved budgeted funding, participation level or amount of savings*;
 - The transfer of funds from one measure or program to another measure or program within the same customer class; and
 - *Adding a measure or changing the conditions of a measure, such as its eligibility requirements, technical description, rebate structure or amount, projected savings, estimated incremental costs, projected number of participants, or other conditions so long the change does not increase the overall costs to that customer class.*
14. The proposed minor changes to West Penn's EE&C Plan fall within those categories in that the changes involve: i) the elimination of the DG Program that is underperforming; 2) the transfer of funds from one demand response program to another demand response program within the same customer class; and 3) the transfer of funds from one EE&C program to one demand response program within the same customer class. All proposed minor changes involve programs within the same customer class, namely the large C&I customer class.

SPECIFIC CHANGES AND EXPLANATIONS FOR CHANGES

15. West Penn has gained significant experience with its current demand responses programs included in its EE&C Plan. During the summer of 2011, the Company contracted with Curtailment Service Providers ("CSPs") to recruit and enroll commercial and industrial customers for its demand response programs and operated a demand response pilot program. The Company also conducted additional requests for proposal ("RFPs") related to additional implementation and operation of the demand response programs to achieve compliance with the Act 129 demand response targets for the summer of 2012. As a result of that

experience, the Company is proposing several minor changes to the demand response programs in its Current Plan.

16. First, West Penn proposes the expansion of the CRDR Program to achieve the required demand reductions required by Act 129 for the summer of 2012. The CRDR is focused on reducing the demand in large C&I customer sectors by deploying customer resources from load curtailment strategies provided by PJM Curtailment Service Providers or Customer Curtailment Service Providers. The Company proposes, through the shifting of budget dollars and the removal of the DG Program, to increase the CRDR Program by \$2,761,455 for a total of \$6,926,123. This new budget is demonstrated in WPP Table 4 and Appendix D-6.
17. Second, West Penn proposes to remove the DG Program and to transfer funds from that program, \$808,477, to the Company's CRDR Program. The DG Program was focused on reducing demand by deploying customer "nonutility" generation resources for demand response activities and to provide standby generation service for unplanned utility outages or other customer maintenance activities. Since January 2011, the Company's CSP marketed and promoted the DG Program to customers. The Company also issued a RFP in December 2011 to support implementation of this program for the summer of 2012. Despite these efforts, none of the Company's customers have enrolled in the program. Because it is clearly underperforming, the Company proposes to remove this program and transfer the budgeted funding for this program, \$808,477, to the CRDR Program. This budget transfer is demonstrated in WPP Table 4.

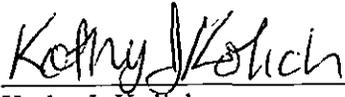
18. *Third, West Penn proposes to reduce the CLR Program budget by \$1,343,654, and to transfer those funds to the CRDR Program. Since April 2011, the Company has marketed and promoted the CLR program. The Company also operated a pilot program during the summer of 2011. Based on this experience, and the fact that customer response has been less than originally projected, with only 2 customers participating in the pilot program during the summer of 2011, the Company proposes to reduce the funding for this program and to transfer those funds, \$1,343,654, to the CRDR Program. This budget transfer is demonstrated in WPP Table 4 and Appendix D-6.*
19. *Last, West Penn proposes to reduce the Large C&I Equipment Program budget by \$609,324, and to transfer those funds to the CRDR Program. Since November 2011, the Company has worked with a CSP to market and promote the Large C&I Equipment Program. It appears that the budget for this program is more than sufficient to meet the demand, resulting in less funding than first anticipated to meet this program's needs. Therefore, the Company proposes to transfer a portion of the program funding, \$609,324 to the CRDR Program. This budget transfer is demonstrated in WPP Table 4 and Appendix D-6.*
20. *These changes will best position West Penn to achieve the demand reductions required by Act 129 during the summer of 2012. Expanding the CRDR Program allows the Company to leverage the management, marketing, implementation and tracking capabilities of the third party PJM Curtailment Service Providers, which will be contracted to implement the CRDR Program for the summer of 2012.*

CONCLUSION

WHEREFORE, in light of the foregoing, the Companies respectfully ask that Staff approve the proposed changes described herein in accordance with the Commission's June 10, 2011 Final Order in Docket No. M-2008-2069887.

Respectfully submitted,

Dated: May 15, 2012



Kathy J. Kolich
Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44309
(330) 384-4580
(330) 384-3875
kjkolich@firstenergycorp.com

Section 1-A, Overview of Plan Changes, Pg 7-12:

- A. **Proposed Program Changes** — ~~Proposed Program changes are as illustrated in WPP Table 4, WPP Table 5, and WPP Table 6 below~~ **are updated to reflect the proposed minor program changes and as described in more detail as follows:-**

WPP Table 4 below illustrates the Programs and Program Budgets under the Current Plan (as approved on May 10, 2012), as compared to the Programs and Program Budgets of this New Plan resulting from the proposed minor program changes. ÷

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Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 4 - Plan Program Budget Comparison				
Current Plan (As filed 09-10-2010, see Note 1)		New Plan		Net Change
Residential				
Residential Energy Star & High Efficiency Appliance Program	\$16,573,857	Residential Appliance Turn-In Program	\$3,145,231	
Compact Fluorescent Lighting (CFL) Rewards Program	\$3,203,876	Residential Energy Efficient Products Program	\$11,783,667	
Residential Whole Home Appliance Efficiency Program	\$3,212,673	Residential Energy Efficient HVAC Equipment Program	\$2,196,347	
Residential Home Performance Program	\$9,839,068	Residential Home Performance Program	\$16,188,596	
Critical Peak Rebate (CPR) Rate	\$1,492,888	Critical Peak Rebate (CPR) Rate - Residential	\$1,513,922	
N/A	N/A	Conservation Voltage Reduction (CVR) Program	\$832,218	
Stipulation Adjustment (See Note 1)	\$930,000	N/A	N/A	
Sub Total	\$35,052,362	Sub Total	\$35,659,980	
Residential Low Income				
Residential Low Income Home Performance Check-Up Audit & Appliance Replacement Program	\$5,494,402	Limited Income Energy Efficiency Program (LIEEP)	\$7,458,352	
Residential Joint Utility Usage Management Program	\$6,730,518	Joint Utility Usage Management Program	\$4,558,515	
N/A	N/A	Conservation Voltage Reduction (CVR) Program	\$208,054	
Sub Total	\$12,224,921	Sub Total	\$12,224,921	
TOTAL RESIDENTIAL	\$47,277,284	TOTAL RESIDENTIAL	\$47,884,902	\$607,618
Small Commercial & Industrial				
Custom Technology Applications Program	\$7,349,682	C/I Equipment Program - Small	\$21,333,306	
Commercial Products Efficiency Program	\$15,300,747			
Commercial HVAC Efficiency Program	\$2,202,113			
Time of Use (TOU) with Critical Peak Pricing Rate	\$818,047			
N/A	N/A	Conservation Voltage Reduction (CVR) Program	\$580,151	
Sub Total	\$25,670,589	Sub Total	\$22,808,507	-\$2,862,082
Large Commercial & Industrial				
Custom Applications Program	\$10,161,920	C/I Equipment Program - Large	\$9,184,429	
Commercial Products Efficiency Program	Included Above			
Customer Load Response Program	\$2,800,789			
Customer Resources Demand Response Program	\$4,259,435			
Distributed Generation Program	\$4,171	Distributed Generation Program	\$808,477	
N/A	N/A	Conservation Voltage Reduction (CVR) Program	\$280,073	
Stipulation Adjustment (See Note 1)	-\$930,000	N/A	N/A	
Sub Total	\$16,240,814	Sub Total	\$16,249,194	\$8,380
Governmental				
Governmental Lighting Efficiency Program	\$5,061,304	Governmental and Institutional Program	\$7,207,363	
N/A	N/A	Conservation Voltage Reduction (CVR) Program	\$100,026	
Sub Total	\$5,061,304	Sub Total	\$7,307,389	
TOTAL NON-RESIDENTIAL	\$46,972,708	TOTAL NON-RESIDENTIAL	\$46,366,090	-\$607,618
CURRENT PLAN TOTAL	\$94,249,992	NEW PLAN TOTAL	\$94,249,992	

NOTE 1 - By Stipulation entered into between West Penn and the West Penn Power Industrial Intervenor ("WPP"), dated December 2, 2010, and approved by the Commission on January 13, 2011, the Company agreed to reduce the budget of the Custom Applications

Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 4 - Plan Program Budget Comparison				
Current Plan approved May 10, 2012 (See Note 1)		New Plan with proposed minor changes		Net Change
Residential				
Residential Appliance Turn-In Program	\$3,145,231	Residential Appliance Turn-In Program	\$3,145,231	
			\$11,783,667	
Residential Energy Efficient Products Program	\$11,783,667	Residential Energy Efficient Products Program	\$0	
			\$0	
Residential Energy Efficient HVAC Equipment Program	\$2,196,347	Residential Energy Efficient HVAC Equipment Program	\$2,196,347	
Residential Home Performance Program	\$16,331,872	Residential Home Performance Program	\$16,331,872	
Critical Peak Rebate (CPR) Rate - Residential	\$1,513,922	Critical Peak Rebate (CPR) Rate - Residential	\$1,513,922	
Conservation Voltage Reduction (CVR) Program	\$832,216	Conservation Voltage Reduction (CVR) Program	\$832,216	
Sub Total	\$35,803,256	Sub Total	\$35,803,256	\$0
Residential Low Income				
Limited Income Energy Efficiency Program (LIEEP)	\$7,315,076	Limited Income Energy Efficiency Program (LIEEP)	\$7,315,076	
Joint Utility Usage Management Program	\$4,558,515	Joint Utility Usage Management Program	\$4,558,515	
Conservation Voltage Reduction (CVR) Program	\$208,054	Conservation Voltage Reduction (CVR) Program	\$208,054	
Sub Total	\$12,081,646	Sub Total	\$12,081,646	\$0
TOTAL RESIDENTIAL	\$47,884,902	TOTAL RESIDENTIAL	\$47,884,902	\$0
Small Commercial & Industrial				
C/I Equipment Program - Small	\$21,333,306	C/I Equipment Program - Small	\$21,333,306	
Time of Use (TOU) with Critical Peak Pricing (CPP) Rate	\$895,050	Time of Use (TOU) with Critical Peak Pricing (CPP) Rate	\$895,050	
Conservation Voltage Reduction (CVR) Program	\$580,151	Conservation Voltage Reduction (CVR) Program	\$580,151	
Sub Total	\$22,808,507	Sub Total	\$22,808,507	\$0
Large Commercial & Industrial				
C/I Equipment Program - Large	\$9,184,429	C/I Equipment Program - Large	\$8,575,105	
Customer Load Response Program	\$1,811,548	Customer Load Response Program	\$487,894	
Customer Resources Demand Response Program	\$4,164,867	Customer Resources Demand Response Program	\$6,928,123	
Distributed Generation Program	\$808,477			
Conservation Voltage Reduction (CVR) Program	\$280,073	Conservation Voltage Reduction (CVR) Program	\$280,073	
N/A	N/A	N/A	N/A	
Sub Total	\$18,249,194	Sub Total	\$18,249,194	\$0
Governmental				
Governmental and Institutional Program	\$7,207,383	Governmental and Institutional Program	\$7,207,383	
Conservation Voltage Reduction (CVR) Program	\$100,026	Conservation Voltage Reduction (CVR) Program	\$100,026	
Sub Total	\$7,307,389	Sub Total	\$7,307,389	\$0
TOTAL NON-RESIDENTIAL	\$46,365,090	TOTAL NON-RESIDENTIAL	\$46,365,090	\$0
CURRENT PLAN TOTAL	\$94,249,992	NEW PLAN TOTAL	\$94,249,992	

NOTE 1 - By Joint Petition for Settlement between Office of Consumer Advocate, Office of Small Business Advocate, Pennsylvania Communities Organizing for Change and the West Penn Power Industrial Intervenor and West Penn Power, the Company reinstated \$143,000 to the low income residential sector budget, moving the funds from the Residential Home Performance Program.

Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 5 below illustrates the measures that are included in both the Current Plan (as filed on August 9, 2011 approved on May 10, 2012), and this New Plan reflecting the proposed minor program changes. -NOTE: Only change is removal of the Distributed Generation measure:

WPP Table 5 - Common Program Measures		
Common Measures	Current Plan Program (09-10-2010)	New Plan Program
Residential		
Refrigerator - Freezer Recycling	Residential Energy Star & High Efficiency Appliance Program	Residential Appliance Turn-In Program
Room Air Conditioner Recycling		
Clothes Washer Energy Star		
Dishwasher Energy Star		
Refrigerators-Freezers Energy Star		
Room Air Conditioners		
CFLs	Compact Fluorescent Lighting (CFL) Rebate Program	Residential Energy Efficient Products Program
Energy Star Water Heater		
Air Source Heat Pump	Residential Whole Home Appliance Efficiency Program	Residential Energy Efficient HVAC Equipment Program
Central Air Conditioning		
Ground Source Heat Pump		
HVAC - Maintenance		
On Line Aids/EE Kits	Residential Home Performance Program	Residential Home Performance Program
Home Audits w/ direct installed measures		
Whole Building Audit (Test-In)		
Roof Insulation		
Multiple Family - CFLs		
Behavior Modification		
CFLs Promotional	Critical Peak Rebate (CPR) Rate - Residential	Critical Peak Rebate (CPR) Rate - Residential
Critical Peak Rebate		
Residential Low Income		
Joint Utility Usage Management Program	Residential Energy Usage Management Program	Joint Utility Usage Management Program
Audits with Direct Install Measures	Residential Low Income Home Performance Check-Up Audit & Appliance Replacement Program	Limited Income Energy Efficiency Program (LIEEP)
Appliance Replacement	Residential Low Income Home Performance Check-Up Audit & Appliance Replacement Program	Limited Income Energy Efficiency Program (LIEEP)
Small Commercial & Industrial		
Custom Projects ²	Commercial Products Efficiency Program	CII Equipment Program - Small
T8 Lighting ¹		
T6 Lighting ^{1,2}		
Occupancy Sensors ¹		
LED Exit Signs		
Plug Load Controls		
CFLs	Commercial HVAC Efficiency Program	Time of Use (TOU) with Critical Peak Pricing (CPP) Rate
HVAC - Maintenance		
Time of Use Critical Peak Pricing	Time of Use (TOU) with Critical Peak Pricing Rate	Time of Use (TOU) with Critical Peak Pricing (CPP) Rate
Large Commercial & Industrial		
Custom Projects	Custom Applications Program	CII Equipment Program - Large ¹
Customer Load Response	Customer Load Response Program	Customer Load Response Program
Customer Resources Demand Response	Customer Resources Demand Response Program	Customer Resources Demand Response Program
Distributed Generation	Distributed Generation Program	Distributed Generation Program
Governmental		
CFLs	Governmental Lighting Efficiency Program	Governmental and Institutional Program ²
T8 Lighting		
LED Exit Signs		
LED Auto Traffic Signals		
LED Pedestrian Signals		

1. Measure also included in CII Equipment Program - Large
 2. Measure also included in Governmental and Institutional Program

Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 5 - Common Program Measures	
Common Measures	New Plan Program with proposed minor changes
Residential	
Refrigerator - Freezer Recycling	Residential Appliance Turn-In Program
Room Air Conditioner Recycling	
Clothes Washer Energy Star	Residential Energy Efficient Products Program
Dishwasher Energy Star	
Refrigerators-Freezers Energy Star	
Room Air Conditioners	
CFLs	
Energy Star Water Heater	
Energy Star Dehumidifiers	
Holiday Lights	
Variable Speed Pool Pump	
Smart Strip Plug Outlet	
Torchiera Floor Lamps	
Energy Star Televisions	
Energy Efficient Water Heater	
CFLs Promotional	
Air Source Heat Pump	Residential Energy Efficient HVAC Equipment Program
Central Air Conditioning	
Ground Source Heat Pump	
HVAC - Maintenance	
Furnace Fans	
On Line Audit/EE Kits	Residential Home Performance Program
Home Audits w/ direct installed measures	
Whole Building Audit (Test-In)	
Roof Insulation	
Multiple Family - CFLs	
Behavior Modification	
Pool Pump Reprogramming	
Energy Star Windows	
Duct Sealing	
Critical Peak Rebate	Critical Peak Rebate (CPR) Rate - Residential
Residential Low Income	
Joint Utility Usage Management Program	Joint Utility Usage Management Program
Audits with Direct Install Measures	Limited Income Energy Efficiency Program (LIEEP)
Appliance Replacement	
Extra Measures to LIURP (Incl CFLs, Smart Strips)	
EE Kits (Incl Multi Family and Low Usage)	

Overview of Plan

- WPP Table 5 - Common Program Measures (Cont.)	
Common Measures	New Plan Program with proposed minor changes
Small Commercial & Industrial	
Custom Projects ²	C/I Equipment Program - Small
T8 Lighting ¹	
T5 Lighting ^{1,2}	
Occupancy Sensors ¹	
LED Exit Signs	
Plug Load Controls	
CFLs	
HVAC - Maintenance	
AntiSweatHeater Controls	
Energy Star Commercial Solid Door Freezers	
Energy Star Commercial Solid Door Refrigerators	
Energy Star Ice Machines	
Energy Star Steam Cookers	
Energy Efficient Water Heater	
Direct Install Suite	
Pre Rinse Sprayers	
Strip Curtains	
Vending Equipment Controller	
VFD's - Water Pumps	
VFD's - HVAC Fans	
VFD's - Air Compressors	
Master Metered Multifamily CFLs	
Air Conditioning	
Evaporator Fan ECM Motors	
Time of Use Critical Peak Pricing	Time of Use (TOU) with Critical Peak Pricing (CPP) Rate
Large Commercial & Industrial	
Custom Projects	C/I Equipment Program - Large ¹
VFD's - Water Pumps	
VFD's - HVAC Fans	
VFD's - Air Compressors	Customer Load Response Program
Customer Load Response	
Customer Resources Demand Response	Customer Resources Demand Response Program
Governmental	
CFLs	Governmental and Institutional Program ²
T8 Lighting	
LED Exit Signs	
LED Auto Traffic Signals	
LED Pedestrian Signals	
Street Lighting	
Master Metered Multifamily CFLs	
Commercial, Industrial Audits	

1. Measure also included in C/I Equipment Program - Large
 2. Measure also included in Governmental and Institutional Program

Overview of Plan

WPP Table 6 below illustrates the new and removed measures that are included in this the New Current Plan (as approved on May 10, 2012) reflecting the proposed minor program changes. NOTE: Only change is removal of the Distributed Generation measure.

WPP Table 6 - Proposed New and Removed Program Measures	
New Measures	
Measures	New Program
Residential	
Energy Star Dehumidifiers	Residential Energy Efficient Products Program
Holiday Lights	
Variable Speed Pool Pump	
Smart Strip Plug Outlet	
Torchiere Floor Lamps	
Energy Star Televisions	
Energy Efficient Water Heater	
Furnace Fans	Residential Energy Efficient HVAC Equipment Program
Pool Pump Reprogramming	Residential Home Performance Program
Energy Star Windows	
Duct Sealing	
Residential Low Income	
Extra Measures to LIURP (Incl CFLs, Smart Strips)	Limited Income Energy Efficiency Program (LIEEP)
EE Kits (Incl Multi Family and Low Usage)	
Small Commercial & Industrial	
AntiSweatHeater Controls	C/I Equipment Program - Small
Energy Star Commercial Solid Door Freezers	
Energy Star Commercial Solid Door Refrigerators	
Energy Star Ice Machines	
Energy Star Steam Cookers	
Energy Efficient Water Heaters	
Direct Install Units	
Kitchen Rinse Sprays	
Window Curtains	
Vending Equipment Controller	
VFD's - Water Pumps	
VFD's - HVAC Fans	
VFD's - Air Compressors	
Master Metered Multifamily CFLs	
Air Conditioning	
Evaporator Fan ECM Motors	
Large Commercial & Industrial	
VFD's - Water Pumps	C/I Equipment Program - Large
VFD's - HVAC Fans	
VFD's - Air Compressors	
Governmental	
Street Lighting	Governmental and Institutional Program
Master Metered Multifamily CFLs	
Commercial, Industrial Audits	
Removed Measures	
Measures	Current Program (09-10-2010)
Clothes Dryers	Residential Energy Star & High Efficiency Appliance Program
Programmable Thermostats	

Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 6 - Proposed New and Removed Program Measures	
Removed Measures	New Plan Program with proposed minor changes
Large Commercial & Industrial	
Distributed Generation	Distributed Generation

Overview of Plan

Section 1-B, Pg 15-16

WPP Table 7b below provides the commercial and industrial program summary descriptions and incentive strategy as included in the Current Plan (as approved on May 10, 2012) reflecting the proposed minor program changes. -NOTE: Only change is removal of the Distributed Generation Program.

WPP Table 7b: EE&C Programs - Commercial & Industrial		
Program	Description	Incentive Strategy
C/I Equipment Program - Small	Provides financial incentives and support to customers directly or through retailers for implementing energy efficient equipment and products. Other delivery mechanisms may include EE kits provided to participants and audits coupled with direct installation of low cost measures.	This program provides incentives for a portion of the incremental technology costs of high efficiency measures. In addition, it will provide technical support, rebates, and support access to project financing. Incentives will also be available to customers and through distributors.
C/I Equipment Program - Large	Provides financial incentives and support to customers directly or through retailers for implementing energy efficient equipment and products. Other delivery mechanisms may include EE kits provided to participants and audits coupled with direct installation of low cost measures.	This program provides incentives for a portion of the incremental technology costs of high efficiency measures. In addition, it will provide technical support, rebates, and support access to project financing. Incentives will also be available to customers and through distributors.
Conservation Voltage Reduction (CVR) Program	Strategically reduce voltage across designated portions of the Company's distribution system. Energy and demand savings vary depending on load level.	No customer incentive is provided
Time of Use (TOU) with Critical Peak Pricing (CPP) Rate	A rate structure that encourages customers to lower their demand and energy consumption during on-peak and peak periods by charging a higher price during these periods and a lower price during off-peak periods, that reflects the cost of serving customers during these periods.	The incentive to reduce load resides within the rate schedule and encourage a customer to reduce or shift load from critical-peak and on-peak period to the off-peak periods.
Customer Load Reduction Program	A program that provides demand response with participating customers by contracting with customers for load reduction during peak load hours. Customers will receive payment for their participation in Company demand response events.	The Company will provide incentive payments to participating customers that reduce load during the top 100 hours, which will be based on the actual load reduction during the events.
Customer Resources Demand Response Program	This program is designed to focus on reducing demand during the 100 highest peak load hours of the year. The Company will contract 3 rd Party PJM Curtailment Service Providers or Customer Curtailment Service Providers (CSPs) who will develop a portfolio of callable load response resources that will be dispatched for demand response activities during the top 100 hours, June 1 to September 30.	The Company will pay the 3 rd party vendors for the actual load reductions that occurred during the demand response events. The participating customers will receive incentives based on individual contracts between the CSP and will be based on the actual load reduction during the events.
Distributed Generation Program	A program that provides demand response with participating customers by deploying customer-owned standby generation during peak load hours. The Company will contract with third party dispatchable generation provider(s) to operate, maintain and dispatch a customer's standby generator.	The Company will provide incentive payments to participating customers that operate their standby generation per dispatch requirements of the top 100 hours. The payments will be based on the actual load reduction during the events.

Energy Efficiency and Conservation Plan

Overview of Plan

WPP Table 7b: EE&C Programs - Commercial & Industrial		
Program	Description	Incentive Strategy
C/I Equipment Program - Small	Provides financial incentives and support to customers directly or through retailers for implementing energy efficient equipment and products. Other delivery mechanisms may include EE kits provided to participants and audits coupled with direct installation of low cost measures.	This program provides incentives for a portion of the incremental technology costs of high efficiency measures. In addition, it will provide technical support, rebates, and support access to project financing. Incentives will also be available to customers and through distributors.
C/I Equipment Program - Large	Provides financial incentives and support to customers directly or through retailers for implementing energy efficient equipment and products. Other delivery mechanisms may include EE kits provided to participants and audits coupled with direct installation of low cost measures.	This program provides incentives for a portion of the incremental technology costs of high efficiency measures. In addition, it will provide technical support, rebates, and support access to project financing. Incentives will also be available to customers and through distributors.
Conservation Voltage Reduction (CVR) Program	Strategically reduce voltage across designated portions of the Company's distribution system. Energy and demand savings vary depending on load type.	No customer incentive is provided
Time of Use (TOU) with Critical Peak Pricing (CPP) Rate	A rate offering that encourages customers to lower their demand and energy consumption during on-peak and peak load periods by charging a higher price during these periods and a lower price during off-peak periods, that reflects the cost of serving customers during these periods.	The incentive to reduce load resides within the rate schedule and encourage a customer to reduce or shift load from critical-peak and on-peak period to the off-peak periods
Customer Load Response Program	A program that provides demand response with participating customers by contracting with customers for load reduction during peak load hours. Customers will receive payment for their participation in Company demand response events.	The Company will provide incentive payments to participating customers that reduce load during the top 100 hours, which will be based on the actual load reduction during the events.
Customer Resources Demand Response Program	This program is designed to focus on reducing demand during the 100 highest peak load hours of the year. The Company will contract 3rd Party PJM Curtailment Service Providers or Customer Curtailment Service Providers (CSPs) who will develop a portfolio of callable load response resources, including customer curtailable load and customer-owned standby generation, that will be dispatched for demand response activities during the top 100 hours, June 1 to September 30.	The Company will pay the 3rd party vendors for the actual load reductions that occurred during the demand response events. The participating customers will receive incentives based on individual contracts between the CSP and will be based on the actual load reduction during the events.

Section 3.4, Program Descriptions, Pg 70-80

The Program Descriptions as included in the Current Plan (as approved on May 10, 2012) reflecting the proposed minor program changes.

<p>Program Title and Program years during which program will be implemented</p>	<p>Customer Load Response Program January 2011 to May 2013</p>
<p>Objective(s)</p>	<p>The program is focused on reducing demand in the small and large, commercial and industrial, and governmental/non-profit customer sectors. Under this program, the Company will contract with customers to implement load curtailments during peak load periods. By controlling the demand for energy during the peak periods, load resources can become an integral part of managing the overall supply of energy to the system. A customer who participates in capacity and/or energy markets will also realize savings in the form of reduced capacity and energy costs.</p>
<p>Target market</p>	<p>The program will initially target small and large, commercial and industrial, and governmental/non-profit customers in the Company service territory, with demand of at least 300 kW or greater. This program will be expanded to other small commercial and industrial, and governmental/non-profit customers in conjunction with implementation of Smart Metering infrastructure</p>
<p>Program description</p>	<p>The Company will assist customers by providing load management services by actively educating and providing assistance with the transition to market prices, load shaping and participation in PJM markets. Contracting with customers for load reduction as well as assisting customers with entry into the real time energy markets will help control the demand during peak hours. A customer who participates in this program will receive incentives based on their actual hourly load reduction from their calculated baseline during events called by the Company for the top 100 hours of load. Customers will have flexibility in selecting how many hours that they can participate with 50 hours being typical.</p>
<p>Implementation strategy (including expected changes that may occur in different program years)</p>	<p>The Company will provide all technical assistance, project management and marketing activities to support the program. The Company will also be responsible for all marketing materials, contract preparation, load curtailment, and reconciliation services. The Company is registered as a curtailment service provider (CSP) under the PJM Load Management Programs. As part of this program, The Company (directly or through contracted services) will develop the necessary online user tools for customers: customer signup, download data for load profiling or historical energy usage, model load modification schemes and review load curtailment events.</p>
<p>Program issues and risks and risk management strategy.</p>	<p>The recent PJM Base Residual Auction for 2012/2013 also introduces a hurdle in that the value of capacity in the Allegheny Power zone cleared at approximately 10% of the net cost of new entry. In the past, participating customers have realized tremendous value in PJM's Interruptible Load Response (ILR) programs without having to frequently reduce load. Customers making the transition to the Company's Demand Response (DR) program for delivery year</p>

	<p>2012/2013 will be required to control load over numerous events, and up to 100 hours per year. Customer fatigue and dropout will be closely managed.</p>
<p>Anticipated costs to participating customers</p>	<p>The Company will provide interval metering data via our Energy Data Services (“EDS”) at no cost to any customer whose load is participating in this program. Interval data through EDS can be provided monthly or daily in an excel spreadsheet format. For EDS daily data, the data file is made available the next day. Until the Company’s smart metering infrastructure is deployed and functional at the customer’s facility, we will target customers with a demand greater than 300 kW who have interval metering to participate in this demand response program. In cases where customer requests the installation of a KYZ pulse contact, the customer cost for the installation of this additional equipment is \$650 (\$500 for KYZ pulse installation, \$150 for time synchronization).</p>
<p>Ramp up strategy</p>	<p>Customer Service Specialists will roll-out the program using direct contacts with eligible customers in 4th Quarter2010.</p>
<p>Marketing strategy</p>	<p>The customers will be targeted several ways:</p> <p>Assigned accounts: Customer Service Specialists proactively handle approximately 130 of the top energy users that would be eligible for the program. They will personally contact their assigned customers to educate them about this program and the companion Customer Resources Demand Response Program that will be administered by 3rd party PJM Curtailment Service Providers. We will follow up with a direct mail piece to encourage participation and provide more program details, inclusive of both this program and the companion Customer Resources Demand Response Program, and provide information on PJM Curtailment Service Providers who provide load curtailment services.</p> <p>Non-assigned accounts: These accounts are managed by Business Account Specialists in the Company’s call center. Direct mail will be sent to these customers with program details and contact information. The direct mail information will include information on both this program and the Customer Resources Demand Response Program that will be administered by 3rd party PJM Curtailment Service Providers who provide load curtailment services. As a follow up to both audiences, an email will be sent to reinforce the program details, inclusive of both this program and the Customer Resources Demand Response Program. A link to the Company’s web site will allow customers to access more program details and information.</p> <p>Sales/marketing/educational materials will be developed for the Customer Service Specialists to provide to customers, which will include details on all curtailment type programs including the Customer Load Response and the Customer Resources Demand Response and the Distributed Generation programs. All marketing materials will equally promote all demand response programs and</p>

	<p>encourage customers to select a PJM CSP who can best address their needs. The materials will also include a listing of PJM CSPs who provide load curtailment services.</p> <p>The Company also plans to host an annual seminar and invite customers, PJM CSPs and stakeholders to participate. The seminar will focus on providing customers with information on the Customer Load Response and Customer Resources Demand Response and Distributed Generation Programs. The PJM CSPs will be invited to present information and setup vendor tables.</p>
<p>Eligible measures and incentive strategy, include tables for each year of program, as appropriate showing financial incentives & rebate levels (e.g., \$ per measure, \$ per kWh or MW saved)</p>	<p>The customer incentive for this program will be based on the customer's actual measured load reduction from the customer's calculated Customer Baseline during called event periods and a customer incentive rate that will be established based on the results of the load nominations by PJM CSPs for the Customer Resources Demand Response Program (refer to Customer Resources Demand Response Program). Allegheny will calculate the customer incentive rate on a \$\$ per MWh basis based on the weighted average of all contracted load nominations for the Customer Resources Demand Response Program, reduced by a Company administration adjustment to account for the differences in program administration between this program and the Customer Resources Demand Response Program.</p>
<p>Program start date with key schedule milestones:</p>	<p>See Figure 2</p>
<p>Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide EE&C Plan Evaluator</p>	<p>Performance verification will be based on PJM ELRP protocols for the aggregated hourly load reductions of the participants listed in the agreement.</p> <p>The Company will provide a summary of hourly peak load reductions for the aggregated group and for individual customers, with back-up data supporting hourly performance for each customer for Performance Periods using metering data accepted by PJM. Load reductions will be measured against the standard CBL if appropriate or a CBL nominated by the EDC and accepted by PJM.</p>
<p>Estimated participation – includes tables indicating metric(s) with target value(s) per year</p>	<p>See Appendix F</p>
<p>Estimated program budget (total) by year – include table with budget per year</p>	<p>See Appendix D</p>
<p>Savings targets – include tables with total MWh and MW goals per year and cumulative tables that document key assumptions</p>	<p>See Appendix E</p>

of savings per measure or project	
Cost-effectiveness – include TRC for each program	See PUC Table 7d
Other information deemed appropriate	Custom measures will be rebated based upon an analysis of potential energy savings on a case by case basis.

<p>Program Title and Program years during which program will be implemented</p>	<p>Distributed Generation Program September 2011 to May 2013</p>
<p>Objective(s)</p>	<p>The program is focused on reducing demand in the small and large, commercial and industrial, and governmental/non-profit customer sectors, by deploying customer "nonutility" generation resources. The Company will contract with a "distributed generation (DG) Manager" to "harvest" existing installed standby generation capacity. This entity would develop a portfolio of standby generation resources to be dispatched for demand response activities and to provide standby generation service for unplanned utility outages or other customer maintenance activities.</p>
<p>Target market</p>	<p>The program will be initially targeted at existing small and large, commercial and industrial, and governmental/non-profit customers that have a facility demand and have generators rated larger than 300 kW.</p>
<p>Program description</p>	<p>Under the program, customers will contract with a DG Manager to provide the customer with operation and maintenance services on the customer's generator. The DG Manager will dispatch the generator up to 100 hours in response to curtailment event notices issued by the Company during the targeted hours of the Company's 100 hours of highest demand. A customer who participates in this program will be provided an incentive on a \$\$/MWh basis for each hour that their generator is dispatched to target Allegheny Power's hours of highest demand.</p> <p>In the Company's service territory, there is approximately 70 MW of existing standby generation larger than 300 kW. These sources are primarily in hospitals, banking, data center and high tech manufacturing facilities, and the generators range in size up to 2000 kW.</p>
<p>Implementation strategy (including expected changes that may occur in different program years)</p>	<p>The Company customer data for existing customer-owned standby generators that could be "harvested" for this program. The program can be easily marketed to these existing installations and will be the focus of the initial marketing efforts. The DG Manager will be responsible for providing all services to operate, maintain, fuel and dispatch the generators that are enrolled in this program. The Company will assist with initial and follow-up sales calls, in coordination with the DG Manager and customer-selected PJM CSP.</p>
<p>Program issues and risks and risk management strategy</p>	<p>Since this program is a mandatory curtailment program, there is a risk that the hours that the Company calls for curtailment will not be in the top 100 load hours. The Company anticipates a mixed response from various entities regarding the use of standby generation as a resource for demand response, specifically, emission</p>

<p>Anticipated costs to participating customers</p>	<p>permitting and suitability of customer's equipment.</p> <p>The third party DG Manager will contract directly with the customer to maintain and operate the customer's generator. The customer will pay the DG Manager for all operation and maintenance services provided by the DG Manager. The customer costs for these services will vary depending on the size and age of the generator. Prior to the installation of Smart Metering Infrastructure, the Company will provide interval metering data via our Energy Data Services (EDS) at no cost to any customer or PJM CSP customer whose generator is participating in this program. Interval data through EDS can be provided monthly or daily in an excel spreadsheet format. For EDS daily data, the data file is made available the next day. Until the Company's Smart Metering Infrastructure is deployed and functional at the customer's facility, Allegheny will target customers with a demand greater than 300 kW who have interval metering to participate in this demand response program. In cases where PJM CSPs request the installation of KYZ pulse contacts for use with the CSPs telemetry systems, the customer cost for the installation of this additional equipment is estimated to be \$650 (\$500 for KYZ pulse installation, \$150 for time synchronization).</p>
<p>Ramp-up strategy</p>	<p>The Company issued RFP's during the 4th quarter of 2010, and contracted with a DG Manager in January 2011. The DG Manager is presently performing marketing functions to contract with the customer to maintain and operate the program.</p>
<p>Marketing strategy</p>	<p>The program will be primarily marketed between the DG Manager and the Company's Customer Management group. Account Managers actively manage approximately 50% of the customers that the Company has identified who presently own standby generation that would be eligible for the program. The Company has identified approximately 80 customers with standby generators that could take advantage of this program. Since there is a select group of customers with standby generation, the Program Manager will market directly to these customers using direct mail or direct contact from Customer Service Specialists.</p> <p>The Company will develop sales/marketing/educational materials and will assist the DG Manager and PJM CSPs with recruiting potential customers. The materials will provide details on all curtailment type programs including the Customer Load Response, Customer Resources Demand Response and the Distributed Generation Programs. All marketing materials will equally promote all demand response programs and will encourage customers to select a PJM CSP who can best address their needs. The materials will also include a listing of PJM CSPs who provide load curtailment services.</p>
<p>Eligible measures and incentive strategy, include tables for each</p>	<p>The customer incentive for this program will be based on the customer's actual measured load reduction from the customer's calculated Customer Baseline during called event periods and a</p>

<p>Year of program, as appropriate showing financial incentives & rebate levels (e.g., \$ per measure, \$ per kW or MWh saved)</p>	<p>customer incentive rate that will be established based on the results of the load nominations by PJM CSPs for the Customer Resources Demand Response Program (refer to Customer Resources Demand Response Program). The Company will calculate the customer incentive rate on a \$\$ per MWh basis based on the weighted average of all contracted load nominations for the Customer Resources Demand Response Program.</p> <p>In order for the customer to realize the maximum benefits from participating in the Company's demand response programs, the customer's CSP must register the customer's load in the available PJM load response programs. The customer can choose any registered PJM CSP for this service.</p>
<p>Program start date with key schedule milestones</p>	<p>See Figure 2</p>
<p>Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide EE&C Plan Evaluator</p>	<p>Performance verification will be based on PJM ELRP protocols for the aggregated hourly load reductions of the participants listed in the agreement.</p> <p>The Company will provide a summary of hourly peak load reductions for the aggregated group and for individual customers, with back-up data supporting hourly performance for each customer for Performance Periods using metering data consistent with PJM requirements. Load reductions will be measured against a CBL nominated for each customer.</p>
<p>Estimated participation—includes tables indicating metric(s) with target value(s) per year</p>	<p>See Appendix F</p>
<p>Estimated program budget (total) by year—include table with budget per year</p>	<p>See Appendix D</p>
<p>Savings targets—include tables with total MWh and MW goals per year and cumulative tables that document key assumptions of savings per measure or project</p>	<p>See Appendix E</p>

<p>Program Title and Program years during which program will be implemented</p>	<p>Customer Resources Demand Response Program January 2011 through May 2013 Commercial Industrial Demand Response Program</p> <ul style="list-style-type: none"> • Customer Mandatory 100 Hour Curtailment Option • Customer Mandatory 50 Hour Curtailment Option • Customer Voluntary Curtailment Option
<p>Objective(s)</p>	<p>The program is focused on reducing demand in the small and large, commercial and industrial, and governmental/non-profit customer sectors, by deploying customer load or distributed generation resources from load curtailment strategies provided by PJM Curtailment Service Providers or Customer Curtailment Service Providers (CSPs). The Company will contract with one or more PJM CSPs who will develop a portfolio of callable load demand response resources that will be dispatched for demand response activities during the Company's 100 hours of highest demand. RFPs will be developed for the following Options under the program:</p> <ul style="list-style-type: none"> • Mandatory 100 Hour Curtailment Option • Mandatory 50 Hour Curtailment Option • Voluntary Curtailment Option <p>The PJM CSPs will be obligated to perform according to one of the curtailment options, as available. Customer participation in the program, including load and hour commitments, will be according to the contract between the PJM CSP and the customer. Contracted load resources provide a multitude of utility and customer benefits, including: reduces peak demand, and improved grid reliability.</p>
<p>Target market</p>	<p>Contracts for load resources will be initially targeted at existing small and large, commercial and industrial, and governmental/non-profit customers with a demand of at least 300 kW or greater. The program will be expanded to customers less than 300 kW in conjunction with the deployment of smart metering infrastructure that will provide the required metering and communications network for these customers to participate. PJM CSPs may also enroll customers with a demand less than 300 kW where a measurement and verification protocol is approved by the Company in advance of program enrollment.</p>
<p>Program Description</p>	<p>Under the program, PJM CSPs will provide services to register and dispatch customer curtailable load during targeted hours of the Company's 100 hours of highest demand. The Company will contract with PJM CSPs to deliver an amount of curtailable load. The PJM CSPs will structure individual contracts with customers to respond to curtailment event notices issued by the Company to the customer's CSP. Customer participation in the program, including</p>

	<p>load and hour commitments, will be according to the contract between the PJM CSP and the customer.</p> <p>The Company will pay the PJM CSPs based on the actual load reduction that occurred during the curtailment events, based on the contracted rate established through the nomination process. A customer who participates in this program will be compensated by their CSP according to the CSPs contract with the customer for each hour the customer's load is dispatched under this program. All payments to the customer will be from the customer's CSP. In order for the customer to realize the maximum benefits from participating in the Company's demand response programs, the customer's CSP must also register the customer's load in the available PJM load response programs.</p>
<p>Implementation Strategy</p>	<p>The Company believes that it will be difficult to obtain customer interest in a callable demand response program that requires customers to participate for up to 100 hours. To mitigate customer impact and fatigue, CSPs will be responsible to manage their customer portfolios to deliver the contracted load resources to provide the contracted MWh reduction during the Company's 100 hours of highest demand. In addition, the Company will solicit proposals from CSP vendors for mandatory and voluntary options, so as to provide as much flexibility for CSPs as possible.</p>
<p>Program issues and risks and risk management strategy</p>	<p>The program contains both mandatory and voluntary options for CSPs to bid resources, which provides flexibility for PJM CSPs to offer curtailment services to end use customers. Since a portion of this program is a mandatory curtailment, there is a risk that the hours that the Company calls for curtailment will not be in the top 100 load hours. The PJM Base Residual Auction for 2012/2013 introduces a hurdle in that the value of the capacity in Allegheny Power's zone cleared at approximately 10% of the new cost of new entry. In the past, participating customers have realized substantial value in PJM's Interruptible Load Response (ILR) programs without having to frequently reduce load. Customers making the transition to the Company's demand response programs will be required to control load over numerous events, and up to 100 hours per year. Customer fatigue and dropout will be closely managed.</p>
<p>Anticipated costs to participating customers</p>	<p>Prior to the installation of Smart Metering Infrastructure, the Company will utilize existing interval metering via our Energy Data Services ("EDS") at no cost to any customer whose load is participating in this program. Interval data through EDS can be provided monthly or daily in an excel spreadsheet format. For EDS daily data, the data file is made available the next day.</p> <p>In cases where PJM Curtailment Service Provider's request the installation of a KYZ pulse contact for use with the Curtailment Service Provider's telemetry system, the customer cost for the installation of this additional equipment is \$650 (\$500 for KYZ pulse</p>

<p>Marketing strategy</p>	<p>installation, \$150 for time synchronization).</p> <p>For load resources that will be contracted from Curtailment Service Providers, we anticipate some marketing efforts from the Curtailment Service Provider's because they have contracts with customers who are currently participating in the PJM load response programs. The Company will also provide a list of eligible customers to the contracted PJM CSPs for their use in direct marketing to attract additional or new customers. The customer list will provide sufficient data for CSPs to initiate customer contact and marketing activities. Account Managers and Business Account Specialists will provide customers with information on the Customer Resources Demand Response Program. To attract new load resources into the Customer Resources Demand Response Program, the Company will develop sales/marketing/educational materials and will assist the PJM CSPs with recruiting potential customers. The materials will provide details on all curtailment type programs including the Customer Load Response and Customer Resources Demand Response and the Distributed Generation Programs. All marketing materials will equally promote all demand response programs and will encourage customers to select a PJM CSP who can best address their needs. The materials will also include a listing of PJM CSPs who provide load curtailment services.</p>
<p>Eligible measures and incentive strategy, include tables for each year of program, as appropriate showing financial incentives & rebate levels (e.g., \$ per measure, \$ per kWh or MW saved)</p>	<p>All incentives paid by the Company under this program will be paid directly to the PJM CSPs, as part of their overall contract to deliver the curtailment MWs. The Company's payment to the PJM CSPs for load curtailment will be based on the actual measured load reduction from the customer baseline for each hour of the load curtailment event. The contract between the Company and the vendor CSPs will be established per the following curtailment options:</p> <p>Mandatory Curtailment Option</p> <p>A vendor under contract will for this option will be contracted to deliver a firm number of MWs per dispatch requirements of the Company for either the top 100 or 50 hours.</p> <p>Voluntary Curtailment Option</p> <p>A vendor under contract for this option, will be also be contract to deliver a firm number of MWs in accordance with the provisions outlined below:</p> <ol style="list-style-type: none"> a. The CSP will be required to predict the top 100 hours of load for the company in the Company's WPP zone. b. The CSP will be required to aggregate and reduce load during the top 100 highest load hours. If the

	<p>CSP drops load and it is not in the 100 highest load hours, then no payment will be made by the Company</p> <p>c. After September of 2012 (i.e. at the end of the curtailment season, the Company will evaluate Act 129 program records and PJM demand response records to calculate and define the dates and hours of the ACTUAL top 100 load hours for the four month period for its Company zone. The Company will then examine the program event records and pay CSPs \$150.00 per MW hour (15 cents per kWh) for any load reductions that occurred during those 100 highest load hours – this payment will be made in addition to any and all payments made by PJM.</p> <p>d. Performance verification will be based on PJM ELRP protocols for the aggregated hourly load reductions of the participants listed in the agreement</p>
<p>Program start date with key schedule milestones</p>	<p>See Figure 2</p>
<p>Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide EE&C Plan Evaluator</p>	<p>Performance verification will be based on PJM ELRP protocols for the aggregated hourly load reductions of the participants listed in the agreement.</p> <p>The Company will review hourly peak load reduction calculations for individual customers, and back-up data supporting hourly performance for each customer for Performance Periods. Load reductions will be measured against the CBL nominated and accepted for each customer.</p>
<p>Other information deemed appropriate</p>	<p>None.</p>
<p>Estimated Participation – includes tables indicating metric(s) with target value(s) per year</p>	<p>See Appendix F</p>
<p>Estimated program budget (total) by year – include table with budget per year</p>	<p>See Appendix D</p>
<p>Savings targets – include tables with total MWh and MW goals per year and cumulative tables that document key assumptions of savings per measure or project</p>	<p>See Appendix E</p>

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per Program Budget Detail					
Page 11					
WPP Budget Summary					
Four-Year Program Budget					
	Program Code*	Program Year 1	Program Year 2	Program Year 3	Program Year 4
		Fall 2009 Until-5/2010 4-Res-EE P	From 6/2010 Until-5/2011 4-Res-EE P	From 6/2011 Until-5/2012 4-Res-EE P	From 6/2012 Until-5/2013 4-Res-EE P
	Total Budget				
Total	\$94,249,992	\$6,251,762	\$12,226,512	\$42,264,510	\$33,507,208
Utility Labor/Cost***	\$18,985,800	\$3,487,882	\$1,678,723	\$7,213,901	\$6,611,314
Marketing***	\$6,185,328	\$1,239,582	\$2,244,579	\$2,376,649	\$324,408
M&V***	\$2,521,450	\$138,060	\$829,956	\$906,238	\$647,196
Retailer Sales Incentive	\$174,390	\$0	\$0	\$61,483	\$112,906
Rebate Processing	\$758,696	\$0	\$0	\$289,277	\$469,419
Retail Store Discount-Tracking	\$595,294	\$0	\$0	\$223,231	\$372,063
Service Provider Costs***	\$7,986,602	\$1,256,755	\$1,526,172	\$3,490,764	\$1,712,910
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$57,042,432	\$35,393	\$5,947,082	\$27,702,968	\$23,256,991
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

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 per Program Budget Detail

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WPP Budget Summary					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$94,249,992	\$6,251,762	\$11,514,535	\$41,427,003	\$35,056,691
Utility Labor/Cost***	\$16,919,821	\$3,481,862	\$926,441	\$6,994,593	\$5,516,925
Marketing***	\$6,142,526	\$1,239,692	\$2,124,083	\$2,423,151	\$355,599
M&V***	\$2,586,408	\$138,060	\$851,924	\$926,994	\$669,430
Retailer Sales Incentive	\$155,234	\$0	\$0	\$54,357	\$100,877
Rebate Processing	\$743,371	\$0	\$0	\$283,576	\$459,795
Retail Store Discount Tracking	\$595,294	\$0	\$0	\$223,231	\$372,063
Service Provider Costs***	\$8,516,000	\$1,256,755	\$1,665,006	\$3,844,505	\$1,749,734
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$58,591,338	\$135,393	\$5,947,082	\$26,676,595	\$25,832,268
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

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 per Program Budget Detail

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C/I Equipment Program - Large					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Program Code*				
	Total Budget				
Total	\$9,184,429	\$1,314,126	\$4,025,674	\$3,912,739	\$2,931,890
Utility Labor/Cost***	\$2,103,329	\$777,493	\$329,464	\$451,202	\$545,470
Marketing***	\$87,265	\$12,758	\$15,994	\$28,997	\$29,501
M&V***	\$399,999	\$1,602	\$37,633	\$213,760	\$147,004
Retailer Sales Incentive	\$60	\$0	\$0	\$0	\$60
Rebate Processing	\$281,806	\$0	\$0	\$105,500	\$176,106
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$801,071	\$27,558	\$202,958	\$75,555	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$5,511,100	\$0	\$439,625	\$3,037,725	\$2,033,750
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

Appendix D-6					
per Program Budget Detail					
Page 22					
C/I/Equipment Program - Large					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		<i>Fall 2009</i>	<i>From 6/2010</i>	<i>From 6/2011</i>	<i>From 6/2012</i>
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
Program Code*					
Total Budget					
Total	\$8,575,105	\$1,314,126	\$1,025,674	\$3,303,415	\$2,931,890
Utility Labor/Cost***	\$2,103,329	\$777,193	\$329,464	\$451,202	\$545,470
Marketing***	\$87,265	\$12,773	\$15,994	\$28,997	\$29,501
M&V***	\$399,999	\$1,602	\$37,633	\$213,760	\$147,004
Retailer Sales Incentive	\$60	\$0	\$0	\$0	\$60
Rebate Processing	\$281,606	\$0	\$0	\$105,500	\$176,106
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$801,071	\$522,558	\$202,958	\$75,555	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$4,901,776	\$0	\$439,625	\$2,428,401	\$2,033,750
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

Appendix D-6
 per Program Budget Detail

Page 23

Customer Load Response Program						
Four-Year Program Budget						
	Program Code*	Total Budget	Program Year 1	Program Year 2	Program Year 3	Program Year 4
			Fall 2009 Until-5/2010 1-C/I Audits	From 6/2010 Until-5/2011 1-C/I Audits	From 6/2011 Until-5/2012 1-C/I Audits	From 6/2012 Until-5/2013 1-C/I Audits
Total		\$1,811,548	\$0	\$317,152	\$428,970	\$1,067,426
Utility Labor/Cost***		\$1,114,761	\$0	\$317,152	\$227,888	\$569,721
Marketing***		\$12,070	\$0	\$0	\$3,449	\$8,621
M&V***		\$80,317	\$0	\$0	\$22,948	\$57,369
Retailer Sales Incentive		\$0	\$0	\$0	\$0	\$0
Rebate Processing		\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking		\$0	\$0	\$0	\$0	\$0
Service Provider Costs***		\$0	\$0	\$0	\$0	\$0
Service Provide Equip/Audit		\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**		\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**		\$604,400	\$0	\$0	\$172,888	\$431,714
Utility/SP O&M		\$0	\$0	\$0	\$0	\$0

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 per Program Budget Detail

Page 23

Customer Load Response Program					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	1-C/I Audits	1-C/I Audits	1-C/I Audits	1-C/I Audits
	Total Budget				
Total	\$467,894	\$0	\$155,480	\$59,161	\$253,253
Utility Labor/Cost***	\$143,838	\$0	\$29,699	\$45,261	\$68,878
Marketing***	\$4,194	\$0	\$1,696	\$428	\$2,068
M&V***	\$18,132	\$0	\$9,182	\$3,277	\$5,673
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$161,899	\$0	\$114,901	\$10,182	\$36,816
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$139,831	\$0	\$0	\$12	-\$139,819
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

Appendix D-6
 per Program Budget Detail

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Distributed Generation Program						
Four Year Program Budget						
	Program Code*	Total Budget	Program Year 1	Program Year 2	Program Year 3	Program Year 4
			Fall 2009 Until-5/2010 3-C I Equip	From 6/2010 Until-5/2011 3-C I Equip	From 6/2011 Until-5/2012 3-C I Equip	From 6/2012 Until-5/2013 3-C I Equip
Total		-\$808,477	\$0	\$123,892	-\$228,195	-\$456,390
Utility Labor/Cost***	\$219,890	\$0	\$0	\$73,297	\$146,593	
Marketing***	\$124,102	\$0	\$123,892	\$70	\$140	
M&V***	\$4,935	\$0	\$0	\$1,645	\$3,290	
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0	
Rebate Processing	\$0	\$0	\$0	\$0	\$0	
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0	
Service Provider Costs***	\$0	\$0	\$0	\$0	\$0	
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0	
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0	
Incentive Rebate for Equip**	\$459,556	\$0	\$0	\$153,183	\$306,367	
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0	

Appendix D-6
 per Program Budget Detail

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Customer Resources Demand Response Program					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
	Program Code*	Fall 2009	From 6/2010	From 6/2011	From 6/2012
	Total Budget	Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		2-Governmental Programs	2-Governmental Programs	2-Governmental Programs	2-Governmental Programs
Total	\$4,164,667	\$0	\$487,255	\$104,180	\$3,563,232
Utility Labor/Cost***	\$1,070,532	\$0	\$487,255	\$10,423	\$562,854
Marketing***	\$8,851	\$0	\$0	\$161	\$8,690
M&V***	\$132,308	\$0	\$0	\$2,406	\$129,902
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount, Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$0	\$0	\$0	\$0	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$2,952,976	\$0	\$0	\$91,190	\$2,861,786
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

Appendix D-6
 per Program Budget Detail

Page 25

Customer Resources Demand Response Program					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
Program Code*		2-Governmental Programs	2-Governmental Programs	2-Governmental Programs	2-Governmental Programs
Total Budget					
Total	\$6,926,123	\$0	\$70,843	\$472,002	\$6,383,278
	\$0	\$0	\$0	\$0	\$0
Utility Labor/Cost***	\$195,366	\$0	\$32,426	\$47,039	\$115,901
Marketing***	\$98,027	\$0	\$1,698	\$49,754	\$46,575
M&V***	\$201,732	\$0	\$12,786	\$3,477	\$185,469
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$395,673	\$0	\$23,933	\$371,732	\$8
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$6,035,325	\$0	\$0	\$0	\$6,035,325
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

Appendix G

**Table 6A: Portfolio-Specific Assignment
of EE&C Costs**

Page 7

Residential Portfolio (including Low-Income)			
EE&C Program	Cost Elements (\$)		Total Budget (2010-2013)
	<i>Total Incentives</i>	<i>Operations Costs</i>	
Appliance Turn-In	564,975	843,395	1,408,370
CPR	610,830	903,092	1,513,922
CVR	-	832,216	832,216
EE Products	4,894,363	7,715,642	12,610,005
Home Performance	8,730,287	7,179,048	15,909,336
EE HVAC	1,381,367	887,724	2,269,091
CVR (LI RES)	-	208,054	208,054
JUUMP	3,651,626	627,629	4,279,255
LIEEP	3,926,925	1,084,502	7,011,427
Totals	25,760,373	20,281,303	46,041,675

Small Commercial & Industrial			
EE&C Program	Cost Elements (\$)		Total Budget (2010-2013)
	<i>Total Incentives</i>	<i>Operations Costs</i>	
CVR	-	580,151	580,151
Equipment Rebates	16,109,093	4,727,640	20,336,733
Time of Use	199,713	695,337	895,050
Totals	16,308,806	5,503,128	21,811,934

Large Commercial & Industrial			
EE&C Program	Cost Elements (\$)		Total Budget (2010-2013)
	<i>Total Incentives</i>	<i>Operations Costs</i>	
Customer Load Response	604,400	1,207,148	1,811,548
Customer Resources Demand Response	2,952,976	1,211,691	4,164,667
Distributed Generation	459,550	348,927	808,477
Equipment Rebates	5,511,100	3,139,102	8,650,201
CVR	-	280,073	280,073
Totals	9,528,026	6,186,941	15,714,967

Governmental/Non-Profit			
EE&C Program	Cost Elements (\$)		Total Budget (2010-2013)
	<i>Total Incentives</i>	<i>Operations Costs</i>	
Governmental & Institutional	5,445,227	1,451,287	6,896,515
CVR	-	100,026	100,026
Totals	5,445,227	1,551,313	6,996,541

Appendix G

**Table 6A: Portfolio-Specific Assignment
 of EE&C Costs**

Page 7

Residential Portfolio (including Low-Income)			
EE&C Program	Cost Elements (\$)		
	<i>Total Incentives</i>	<i>Operations Costs</i>	<i>Total Budget (2010-2013)</i>
Appliance Turn-In	564,975	843,395	1,408,370
CPR	610,830	903,092	1,513,922
CVR	-	832,216	832,216
EE Products	4,894,363	7,715,642	12,610,005
Home Performance	8,730,287	7,179,048	15,909,336
EE HVAC	1,381,367	887,724	2,269,091
CVR (LI RES)	-	208,054	208,054
JUUMP	3,651,626	627,629	4,279,255
LIEEP	5,926,925	1,084,502	7,011,427
Totals	25,760,373	20,281,303	46,041,675

Small Commercial & Industrial			
EE&C Program	Cost Elements (\$)		
	<i>Total Incentives</i>	<i>Operations Costs</i>	<i>Total Budget (2010-2013)</i>
CVR	-	580,151	580,151
Equipment Rebates	16,109,093	4,227,640	20,336,733
Time of Use	199,713	695,337	895,050
Totals	16,308,806	5,503,128	21,811,934

Large Commercial & Industrial			
EE&C Program	Cost Elements (\$)		
	<i>Total Incentives</i>	<i>Operations Costs</i>	<i>Total Budget (2010-2013)</i>
Customer Load Response	139,831	328,063	467,894
Customer Resources Demand Response	6,035,325	890,798	6,926,123
Equipment Rebates	4,901,776	3,139,102	8,040,878
CVR	-	280,073	280,073
Totals	11,076,932	4,638,035	15,714,967

Governmental/Non-Profit			
EE&C Program	Cost Elements (\$)		
	<i>Total Incentives</i>	<i>Operations Costs</i>	<i>Total Budget (2010-2013)</i>
Governmental & Institutional	5,445,227	1,451,287	6,896,515
CVR	-	100,026	100,026
Totals	5,445,227	1,551,313	6,996,541

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

West Penn Power Company's Request for :
Expedited Approval of Proposed Minor :
Act 129 EE&C Plan Changes Pursuant to : **Docket No. M-2009-2093218**
the June 10, 2011 Final Order in Docket :
No. M-2008-2069887 :
: :
: :
: :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service via overnight, as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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Service via First Class and Electronic Mail, as follows

Tanya McCloskey, Esquire
Christy M. Appleby, Esquire
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
tmmcloskey@paoca.org
cappleby@paoca.org

Sharon Webb, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
swebb@pa.gov

Charles Daniel Shields, Esquire
Carrie B. Wright, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg., 2nd Fl. West
P.O. Box 3265
Harrisburg, PA 17105-3265
chshields@pa.gov
carwright@pa.gov

Harry S. Geller, Esquire
Patrick Cicero, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
hgellerpulp@palegalaid.net
pciceropulp@palegalaid.net

Kurt E. Klapkowski, Esquire
Dept. of Environmental Protection
400 Market Street, 9th Floor
Harrisburg, PA 17101-2301
kklapowsk@pa.gov

Susan E. Bruce, Esquire
Vasiliki Karandrikas, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
sbruce@mwn.com
vkandrikas@mwn.com

Carolyn Pengidore, Esquire
Clearchoice Energy
180 Fort Couch Road, Suite 265
Pittsburgh, Pa 15241
carolyn@clearchoice-energy.com

Daniel Clearfield, Esquire
Eckert Seamans Cherin & Mellott
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com

Lee E. Hartz, Esquire
Assistant General Counsel
National Fuel Gas Distribution Corporation
PO Box 2081
Erie, PA 16512
hartzl@natfuel.com

Richard A. Kanaskie, Esquire
Bureau of Investigation and Enforcement
PO Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Charles E. Thomas, Jr. Esquire
Thomas T. Niesen, Esquire
Thomas, Long, Niesen & Kennard
PO Box 9500
212 Locus Street, Suite 500
Harrisburg, PA 17108-9500
cthomasjr@ttnlaw.com
tniesen@ttnlaw.com

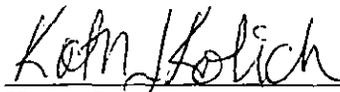
Thomas J. Sniscak, Esquire
Jawke McKeon & Sniscak LLP
100 North 10th Street
PO Box 1778
Harrisburg, PA 17105
tjsniscak@hmslegal.com

Divesh Gupta, Esquire
Constellation Energy
100 Constellation Way, Suite 500C
Baltimore, MD 21202
Divesh.gupta@constellation.com

Mark Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406-2807
morrowm@ugicorp.com

Theodore J. Gallagher, Esquire
Senior Counsel
NiSource Corporate Services Company
501 Technology Drive
Canonsburg, PA 15317
tgallagher@nisource.com

Dated: May 15, 2012



Kathy J. Kolich
Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44309
(330) 384-4580
(330) 384-3875
kjkolich@firstenergycorp.com

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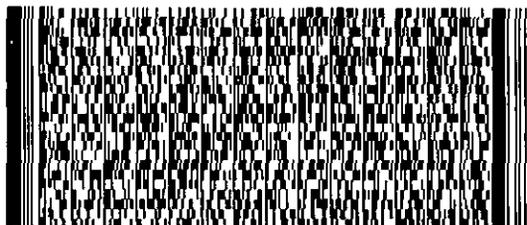
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PA Public Utility Commission
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