

John F. Povilaitis
717 237 4825
john.povilaitis@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852
www.buchananingersoll.com

February 13, 2013

VIA HAND DELIVERY

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

Re: 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

Dear Secretary Chiavetta:

On behalf of West Penn Power Company, I have enclosed for filing 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 regard to the above-captioned consolidated proceeding.

Please contact me if you have any questions regarding the forgoing matters. Copies have been served as indicated in the attached certificate of service.

Very truly yours,


John F. Povilaitis

JFP/kra
Enclosure

RECEIVED
2013 FEB 13 PM 2:44
PA PUC
SECRETARY'S BUREAU

**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**
:
:
:
:

**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
Carrie M. Dunn
OH Attorney No. 0076952
Pro Hac Vice
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(330) 384-4580 - Telephone
(330) 384-3875 - Fax
kjkolich@firstenergycorp.com
cdunn@firstenergycorp.com**

Dated: February 13, 2013

**Counsel for:
West Penn Power Company**

RECEIVED
2013 FEB 13 PM 2:44
PA PUC
SECRETARY'S BUREAU

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 certain residential programs included in its Amended Act 129 Energy Efficiency and Conservation ("EE&C") Plan, which was 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 Residential Energy Efficient HVAC Equipment Program by \$500,594 by decreasing the budget for the Critical Peak Rebate (CPR) Rate – Residential Program by the same amount. West Penn is also proposing to expand the budget for the Residential Appliance Turn-In Program by \$212,168 by decreasing the budget for the Residential Home Performance Program by the same amount.

A red-line/revised 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.
8. On May 15, 2012, West Penn filed a Petition requesting an expedited approval of its proposed minor changes to the demand response programs, which was approved by Staff on June 14, 2012.

B. June 10, 2011 Order

9. The June 10 Order provides for an alternative process for Commission review of minor changes to EE&C Plans.
10. First, Electric Distribution Companies ("EDCs") must file proposed changes with the Commission.
11. Interested parties have 15 days to comment on the filing. Reply comments are due 10 days after the initial comments.
12. 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.
13. 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. These pages are

also attached. 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.

14. 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.
15. The proposed minor changes to West Penn's EE&C Plan fall within the above categories in that the changes involve the transfer of funds from two programs to two other programs within the same customer class, namely the Residential Customer Class.

SPECIFIC CHANGES AND EXPLANATIONS FOR CHANGES

16. The Residential Energy Efficient HVAC Equipment Program has exceeded the Company's projections and has exhausted its approved program budget. To allow for the continuity of this program through May 31, 2013, West Penn proposes to increase the budget for this program by \$500,594. The Company projects that this program will exceed its May 31, 2013 program energy savings target.
17. West Penn proposes to decrease the funding for the Critical Peak Rebate (CPR) Rate – Residential Program by \$500,594. The vast majority of the program activity occurred during the summer of 2012 and the Company does not anticipate

any further significant activity through this program prior to the expiration of the Company's EE&C Plan on May 31, 2013. This program is projected to be under budget in excess of this amount on May 31, 2013.

18. The Company's Residential Appliance Turn-In Program has exceeded the Company's projections and is projected to exhaust its approved program budget in March 2013. To allow for the continuity of this program through May 31, 2013, West Penn proposes to increase the budget for this program by \$212,168.
19. West Penn proposes to decrease the funding for the Residential Home Performance Program by \$212,168. This program is projected to be under budget in excess of this amount on May 31, 2013.
20. The budget changes listed above for Residential Energy Efficient HVAC Equipment Program, Critical Peak Rebate (CPR) Rate - Residential Program, Residential Appliance Turn-In Program and the Residential Home Performance Program will have no effect on the remainder of the Current Plan or the Residential rate reflected in the Company's Rider EEC-C.
21. The impact of these minor budget transfers are summarized in Exhibit A, which includes a table showing the proposed budget reallocations (West Penn Proposed Budget Reallocation Table) and revisions to Appendix D-6 from the Company's Plan.
22. These budget changes also have negligible impact on the cost-effectiveness of the programs. The anticipated impact on the cost-effectiveness of the programs based on the proposed budget changes is set forth in Exhibit B (West Penn TRC Impact Assessment Table).

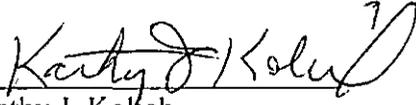
23. These changes will allow West Penn to continue program operations and will best position West Penn to achieve the May 31, 2013 energy savings targets required by Act 129.

CONCLUSION

WHEREFORE, in light of the foregoing, West Penn respectfully asks that Staff approve the proposed changes described herein in accordance with the Commission's June 10, 2011 Final Order in Docket No. M-2009-2093218.

Respectfully submitted,

Dated: February 13, 2013


Kathy J. Kolich
Attorney No. 92203
Carrie M. Dunn
OH Attorney No. 0076952
Pro Hac Vice
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(330) 384-4580 - Telephone
(330) 384-3875 - Fax
kjkolich@firstenergycorp.com
cdunn@firstenergycorp.com

RECEIVED

2013 FEB 13 PM 2:45

PA PUC
SECRETARY'S BUREAU

Exhibit A

West Penn Power Proposed Budget Reallocation

Program	Current Approved Plan Budget (App'D-6)	Proposed Budget	Total Budget Impact
Appliance Turn-In Program	\$3,145,231	\$3,357,399	\$212,168
CPR Program	\$1,513,922	\$1,013,328	(\$500,594)
Home Performance	\$16,188,596	\$15,976,428	(\$212,168)
EE HVAC Program	\$2,196,347	\$2,696,941	\$500,594
Total	\$23,044,096	\$23,044,096	\$0

Residential Home Performance 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$15,976,428	\$710,534	\$700,088	\$10,117,141	\$4,448,665
Utility Labor/Cost***	\$1,354,454	\$157,579	\$86,016	\$545,370	\$565,489
Marketing***	\$2,166,955	\$401,600	\$320,196	\$1,335,416	\$109,743
M&V***	\$350,453	\$21,472	\$67,316	\$137,812	\$123,853
Retailer Sales Incentive	\$130	\$0	\$0	\$43	\$87
Rebate Processing	\$195	\$0	\$0	\$65	\$130
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$3,373,953	\$92,582	\$113,500	\$1,774,871	\$1,393,000
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$8,730,287	\$37,301	\$113,060	\$6,323,564	\$2,256,362
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

- Programs may not have sufficient funding based on actual participation rates of individual program measures differing from the modeling projections;
- The low rates of the Company may not induce customer interest in pursuing energy efficiency projects.
- A project may require higher rebate subsidies or full financing, which may make some programs marginally cost effective or exceed program funding constraints; and
- Reliance on large projects that leverages other funding that does not materialize.

1.1.1. Summary of Proposed Minor Changes

WPP proposes to increase the budget for the Residential Energy Efficiency HVAC Equipment Program by \$500,594 and the Residential Appliance Turn-In Program by \$212,168. The Residential Energy Efficient HVAC Equipment Program has exceeded the Company's projections and has exhausted its approved program budget. The Residential Appliance Turn-In Program has exceeded the Company's projections and is projected to exhaust its approved program budget in March 2013. These changes will allow West Penn to continue program operations through May 31, 2013.

WPP proposes to decrease funding for the Critical Peak Rebate (CPR) Rate – Residential Program by \$500,594 and the Residential Home Performance Program by \$212,168. Critical program activity for the Critical Peak Rebate (CPR) Rate – Residential Program occurred during the summer of 2012 and the Company does not anticipate any further significant activity through this program prior to the expiration of the Company's EE&C Plan on May 31, 2013. These programs are projected to be under budget in excess of these amounts on May 31, 2013.

These changes will have no effect on the remainder of the Current Plan or the Company's Residential rate reflected in Rider EEC-C. These budget transfers are summarized in Appendix D-6.

1.2. Proposed modifications to summary tables of program savings goals, budget & cost-effectiveness (PUC Tables 1, 2 and 3) are shown highlighted and are located in Appendix G.

1.3. Summary of program implementation schedule over four year plan period

The proposed time line for New Plan implementation is set forth below. The Company anticipates that the Company will leverage the existing program implementation processes that have been developed for the PA Companies to the extent possible to support timely program transition and implementation. The Company will use one or more external Program Manager(s) to transition and implement the various programs identified in its New Plan. These Program Manager(s) will be responsible for the transition and start-up of new programs and measures, which will include at a minimum the identification of appropriate staffing skills and levels and the hiring of the same, and the development of website(s), promotional strategies, and processes ensuring quality and other controls supporting successful program transition and implementation. The Program Manager(s)' transition and start-up phase will include communication and coordination with Company personnel so as to (i) present seamless processes for customers or allies that wish to participate in the programs' (ii) maximize process efficiency and controls; and (iii) leverage Company relationships and communications with customers.

Residential Home Performance 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$16,188,596	\$710,534	\$700,088	\$10,223,225	\$4,554,749
Utility Labor/Cost***	\$1,566,622	\$157,579	\$86,016	\$651,454	\$671,573
Marketing***	\$2,166,955	\$401,600	\$320,196	\$1,335,416	\$109,743
M&V***	\$350,453	\$21,472	\$67,316	\$137,812	\$123,853
Retailer Sales Incentive	\$130	\$0	\$0	\$43	\$87
Rebate Processing	\$195	\$0	\$0	\$65	\$130
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$3,373,953	\$92,582	\$118,500	\$1,774,871	\$1,393,000
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$8,730,287	\$37,301	\$13,080	\$6,323,564	\$2,256,362
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EEC. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Residential Appliance Turn-In 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$3,357,399	\$200,204	\$889,669	\$983,060	\$1,284,466
Utility Labor/Cost***	\$152,169	\$38,042	\$38,042	\$38,042	\$38,042
Marketing***	\$895,980	\$104,493	\$450,126	\$171,267	\$170,094
M&V***	\$125,967	\$12,585	\$49,413	\$35,511	\$28,458
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***	\$1,330,481	\$40,324	\$152,511	\$466,424	\$671,222
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$852,803	\$4,760	\$199,577	\$271,816	\$376,650
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Residential Appliance Turn-In 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$3,145,231	\$218,734	\$894,278	\$1,093,307	\$938,913
Utility Labor/Cost***	\$479,830	\$56,572	\$42,651	\$148,289	\$232,318
Marketing***	\$743,463	\$104,493	\$450,126	\$171,267	\$17,577
M&V***	\$125,967	\$12,585	\$49,413	\$35,511	\$28,458
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***	\$943,170	\$40,324	\$152,510	\$466,424	\$283,910
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$852,803	\$4,760	\$199,577	\$271,816	\$376,650
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EEC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Residential Energy Efficient HVAC 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$2,696,941	\$265,547	\$687,766	\$503,917	\$1,239,711
Utility Labor/Cost***	\$367,278	\$151,875	\$78,482	\$78,019	\$58,902
Marketing***	\$313,820	\$6,108	\$154,285	\$53,054	\$100,373
M&V***	\$120,016	\$14,788	\$54,916	\$18,337	\$31,976
Retailer Sales Incentive	\$139,437	\$0	\$0	\$30,768	\$108,669
Rebate Processing	\$28,224	\$0	\$0	\$5,660	\$22,564
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$348,514	\$92,776	\$42,210	\$2,663	\$210,865
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$1,379,651	\$0	\$357,873	\$315,416	\$706,363
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Residential Energy Efficient HVAC 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*	4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
	Total Budget				
Total	\$2,196,347	\$265,547	\$687,766	\$503,917	\$739,118
Utility Labor/Cost***	\$367,278	\$151,875	\$78,482	\$78,019	\$58,902
Marketing***	\$226,938	\$6,108	\$154,285	\$53,054	\$13,491
M&V***	\$95,465	\$14,788	\$54,916	\$18,337	\$7,424
Retailer Sales Incentive	\$92,304	\$0	\$0	\$30,768	\$61,536
Rebate Processing	\$19,553	\$0	\$0	\$5,660	\$13,893
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$137,649	\$92,776	\$42,101	\$2,663	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$1,257,160	\$0	\$357,873	\$315,416	\$583,872
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EEC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EECP plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Critical Peak Rebate (CPR) Rate - Residential					
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
Program Code* Total Budget		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		2-RES App Turn-In	2-RES App Turn-In	2-RES App Turn-In	2-RES App Turn-In
Total	\$1,013,329	\$0	\$76,919	\$388,823	\$547,586
Utility Labor/Cost***	\$230,757	\$0	\$76,919	\$76,919	\$76,919
Marketing***	\$72,525	\$0	\$0	\$28,906	\$43,619
M&V***	\$99,217	\$0	\$0	\$39,544	\$59,673
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***	\$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**	\$610,830	\$0	\$0	\$243,454	\$367,375
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Critical Peak Rebate (CPR) Rate - Residential					
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-RES App Turn-In	2-RES App Turn-In	2-RES App Turn-In	2-RES App Turn-In
	Total Budget				
Total	\$1,513,922	\$0	\$451,284	\$423,529	\$639,110
Utility Labor/Cost***	\$731,350	\$0	\$451,284	\$111,624	\$168,442
Marketing***	\$72,525	\$0	\$0	\$28,906	\$43,619
M&V***	\$99,217	\$0	\$0	\$39,544	\$59,673
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***	\$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**	\$610,830	\$0	\$0	\$243,454	\$367,375
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "ME-EC_Plan_Appendices-WCharts-Budget"

** Variable based on number of units of participation each year.

*** Budget line items reflect the results of measure based modeling for the EECP plan filing. Actual program expenditures

These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Exhibit B

West Penn Power TRC Impact Assessment

Program	Approved TRC Costs (App G. Table 7A Cumulated) (\$000)	Approved TRC Benefits (App G. Table 7A Cumulated) (\$000)	TRC as Approved	Revised TRC Cost (1) (000)	Revised TRC Benefit (1) (000)	Revised TRC
Appliance Turn-In Program	1,911	9,531	5.0	2,040	10,174	5.0
CPR Program	903	343	0.4	604	230	0.4
Home Performance	14,293	24,041	1.7	14,107	23,729	1.7
EE HVAC Program	4,281	3,130	0.7	5,257	3,843	0.7
Total	21,388	37,045	1.7	22,008	37,976	1.7
Sector & Plan	Approved TRC Costs (App G. Table 1) (\$000)	Approved TRC Benefits (App G. Table 1) (\$000)	TRC as Approved	Revised TRC Cost (1) (000)	Revised TRC Benefit (1) (000)	Revised TRC
Residential (exclusive of Low Income) Sector	42,153	110,235	2.6	42,773	111,166	2.6
Total Plan	130,996	290,200	2.2	131,616	291,131	2.2

(1) Revised TRC Costs and Benefits based on linear extrapolation of approved TRC Costs and Benefits in relation to proposed budget change

**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 hand delivery, as follows:

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

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

RECEIVED
2013 FEB 13 PM 2:44
PA PUC
SECRETARY'S BUREAU

Kimberly Childe, Esquire
Dept. of Environmental Protection
400 Market Street, 9th Floor
Harrisburg, PA 17101-2301
kchilde@pa.gov

Susan E. Bruce, Esquire
Vasiliki Karandrikas, Esquire
Barry Naum, Esquire
Charis MinCavage, Esquire
Pamela C. Polacek, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
sbruce@mwn.com
vkandrikas@mwn.com
cmincavage@mwn.com
bnaum@mwn.com
ppolacek@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

Ruben S. Brown
The E Cubed Company LLC
1700 York Avenue, B1
New York, NY 10128
rsbrown@ecubdllc.com

Scott H. DeBroff, Esquire
Rhoads & Sinon LLP
One South Market Square
PO Box 1146
Harrisburg, PA 17108-1146
sdebroff@rhoads-sinon.com

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

RECEIVED
2013 FEB 13 PM 2:44
PA PUC
SECRETARY'S BUREAU

Christopher A. Sharp, Esquire
Christopher A. Lewis, Esquire
Melanie J. Tambolas, Esquire
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103-6998
sharp@blankrome.com
lewis@blankrome.com
tambolas@blankrome.com

Brian J. Knipe, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
brian.knipe@bipc.com

Dated: February 13, 2013

Edward P. Yim, Esquire
Office of Representative Camille George
4 East Wing
PO Box 202074
Harrisburg, PA 17120
eyim@pahouse.net


John F. Povilaitis
Attorney No. 28944
Buchanan Ingersoll & Rooney, PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
(717) 237-4825 – Telephone
(717) 233-0852 – Facsimile
John.povilaitis@bipc.com

Kathy J. Kolich
Attorney No. 92203
Carrie M. Dunn
OH Attorney No. 0076952
Pro Hac Vice
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(330) 384-4580 - Telephone
(330) 384-3875 - Fax
kjkolich@firstenergycorp.com
cdunn@firstenergycorp.com

PA PUC
SECRETARY'S BUREAU

2013 FEB 13 PM 2:44

RECEIVED