



Exelon Business Services Company
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October 24, 2013

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Rosemary 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: Implementation of the Alternative Energy Portfolio Standards Act of 2004:
Standards for the Participation of Demand Side Management Resources-
Technical Reference Manual 2014 Update
Docket Nos. M-2012-2313373 and M-00051865**

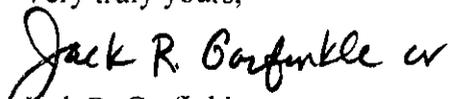
Dear Secretary Chiavetta:

Pursuant to the August 29, 2013 Tentative Order in the above-referenced dockets, enclosed please find **PECO Energy Company's Reply Comments on the Proposed Update to the Technical Reference Manual ("Reply Comments")**. The Reply Comments have also been electronically mailed in Word format to Megan G. Good (megagood@pa.gov) and Kriss Brown (kribrown@pa.gov).

Kindly return a time-stamped copy of this letter in the enclosed self-addressed stamped envelope.

Please do not hesitate to contact me (215-841-4608) should you have any questions regarding this filing.

Very truly yours,


Jack R. Garfinkle
Assistant General Counsel

Enclosures

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

OCT 24 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Implementation of the Alternative Energy :
Portfolio Standards Act of 2004: Standards :
for the Participation of Demand Side : **Docket Nos. M-2012-2313373**
Management Resources – Technical : **M-00051865**
Reference Manual 2014 Update :

**REPLY COMMENTS OF PECO ENERGY COMPANY ON THE
PROPOSED UPDATE TO THE TECHNICAL REFERENCE MANUAL**

Pursuant to the August 29, 2013 Tentative Order entered by the Pennsylvania Public Utility Commission (the “Commission”) in the above-referenced dockets, PECO Energy Company (“PECO” or the “Company”) hereby replies to the joint comments submitted by Citizens for Pennsylvania’s Future (“PennFuture”) and the Keystone Energy Efficiency Alliance (“KEEA”) on the Commission’s proposed 2014 update to its Technical Reference Manual (“TRM”).

As a general matter, the PennFuture/KEEA Joint Comments raise issues that may warrant additional attention as the TRM continues to be implemented. In many instances, however, the Joint Comments do not provide specific recommendations or supporting data from Pennsylvania markets to justify additional changes to the 2014 TRM. For example, PennFuture and KEEA recommend that the baselines for numerous measures be changed from federal efficiency standards to values that reflect “the prevailing level of efficiency in the marketplace.” PennFuture/KEEA Joint Comments, pp. 2-3. They provide national ENERGYSTAR market share data for certain appliances as general evidence that baselines should be increased.

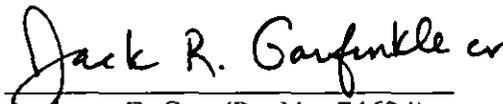
PECO believes that any baseline adjustment must be supported by Pennsylvania-specific market research. The ENERGYSTAR data provided by PennFuture/KEEA is not specific to Pennsylvania and does not provide insight into what would have occurred without energy

efficiency programs. In the absence of Pennsylvania-specific data, continued use of federal efficiency standards in the 2014 TRM is prudent and free ridership can be accounted for through net-to-gross adjustments.

Overall, and as noted in PECO's comments filed October 14, 2013, the Company believes that great progress has been made to date and that the final 2014 TRM Update could serve as an appropriate tool for the entire second phase of the Act 129 Energy Efficiency and Conservation Program.

PECO appreciates the opportunity to participate in this important proceeding and believes that the Company's recommended revisions can improve the effectiveness of the Technical Reference Manual.

Respectfully Submitted,



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Dated: October 24, 2013

For PECO Energy Company



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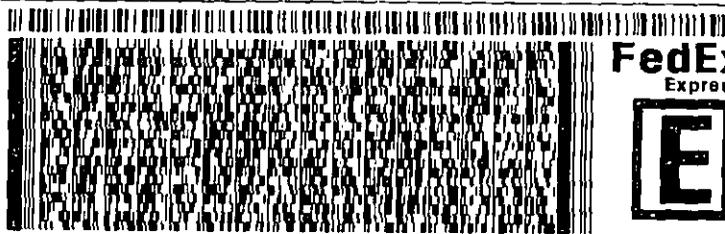
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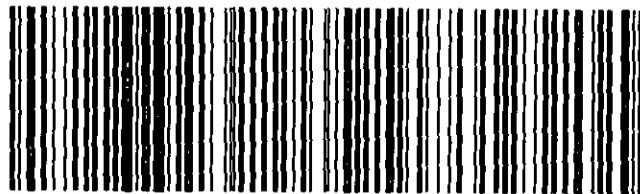


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COUNSELORS AT LAW

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