May 21, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Implementation of the Alternative Energy Portfolio Standards Act of 2004:
Standards for the Participation of Demand Side Management Resources - Technical

Dear Secretary Chiavetta:

Enclosed for filing are the Reply Comments of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

cc: Certificate of Service
Megan G. Good (via e-mail - megagood@pa.gov)
Kriss Brown (via e-mail - kribrown@pa.gov)
CERTIFICATE OF SERVICE  
(M-2015-2469311)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Bureau of Investigation & Enforcement  
PO Box 3265  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17105-3265

Department of Environmental Protection  
P.O. Box 2063  
Market Street Office Building  
Harrisburg, Pennsylvania 17105-2063

Michael Bodaken  
1101 30th Street NW  
Suite 100A  
Washington, DC 20007  
National Housing Trust and  
Pennsylvania Housing Finance Agency

H. Edward Carr, Jr.  
525 Greenfield Road  
Lancaster, PA 17601  
Clearsult Consulting Inc.

Christina Simeone  
1500 Walnut Street  
Suite 502  
Philadelphia, PA 19102  
PennFuture

Terrence J. Fitzpatrick  
Donna M. J. Clark  
Energy Association of PA  
800 North Third Street, Suite 205  
Harrisburg, PA 17102  
Energy Association of PA

David Defide  
Tisheka E. Williams  
Adrienne D. Kirtanich  
Duquesne Light Company  
411 Seventh Avenue, 16th Floor  
Pittsburgh, PA 15219  
Duquesne Light Company

John L. Munsch  
Allegheny Energy Services Corp.  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
MetEd, Penelec, Penn Power & West Penn Power

Eric Dubin  
150 Cordaville Road  
Southborough, MA 01772  
Mitsubishi Electric Cooling & Heating
Jack R. Garfinkle  
Michael S. Swerling  
Anthony E. Gay  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
*PECO*

Romulo L. Diaz, Jr.  
VP and General Counsel  
PECO Energy Company  
2301 Market Street, S21.1  
Philadelphia, PA 19103  
*PECO*

Kathy J. Kolich  
FirstEnergy Corp.  
76 South Main Street  
Akron, OH 44308  
*FirstEnergy Companies*

Brian Kauffman  
1501 Cherry Street  
Philadelphia, PA 19102  
*Keystone Energy Efficiency Alliance*

Thad Carlson  
4217 Trenton Road  
Eagan, MN 55123  
*Tricklestar USA*

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Marisa Uchin  
Director of Regulatory Affairs  
O'Power, Inc.  
1515 N. Courthouse Road, 8th Floor  
Arlington, VA 22201  
*O'Power, Inc.*

Danielle Wilson  
Brian D. Buckley  
Northeast Energy Efficiency Partnerships  
91 Hartwell Avenue  
Lexington, MA 02421  
*Northeast Energy Efficiency Partnerships*

Daniel P. Delaney  
K & L Gates, LLP  
17 N. 2nd Street, 18th Floor  
Harrisburg, PA 17101  
*Nest Labs*

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Date: May 21, 2015

Devin T. Ryan
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


REPLY COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, in accordance with the Pennsylvania Public Utility Commission’s (“Commission”) March 26, 2015 Tentative TRM Order, hereby submits these Reply Comments in response to the comments filed by various parties on or about May 11, 2015.

I. BACKGROUND

On March 26, 2015, the Pennsylvania Public Utility Commission (“Commission”) entered its Tentative Order in the above-captioned proceeding. In the Tentative TRM Order, the Commission issued, for public comment, its proposals for modifying the Technical Reference Manual (“TRM”) as part of its third phase (“Phase III”) of the Energy Efficiency and Conservation (“EE&C”) Program. On May 11, 2015, PPL Electric submitted its Comments on the Tentative TRM Order. PPL Electric will not respond to each issue raised in Tentative TRM

Order and the comments of other parties. Instead, PPL Electric will focus on those issues that are most important to the Company.

II. REPLY COMMENTS OF PPL ELECTRIC

In their comments, Citizens for Pennsylvania’s Future (“PennFuture”), the Clean Air Council, the Sierra Club, the Natural Resources Defense Council (“NRDC”), the Environmental Defense Fund, and the Keystone Energy Efficiency Alliance (“KEEA”) (collectively, “Joint Commentators”) suggest several revisions to the TRM’s baselines. First, the Joint Commentators state that “[t]he TRM continues to place too much emphasis on building energy codes and federal appliance standards as the preferred or sole means to establish baselines” and should instead “rely on more accurate and timely assessments of ‘practices and market transformation’ or ‘current market practices.’” Joint Commentators Comments, p. 5. Second, the Joint Commentators contend that “[t]he baseline for the LED measure should . . . assume a weighted average of EISA compliant incandescents and CFLs, as opposed to 100% CFLs.” Joint Commentators Comments, p. 7. Third, the Joint Commentators “recommend that Pennsylvania develop a new construction baseline based on onsite surveys, not minimum code requirements.” Joint Commentators Comments, p. 14.

PPL Electric does not believe the Joint Commentators’ recommendations are appropriate. The baselines proposed by the Joint Commentators are essentially net savings baselines (i.e., market baselines) that require a significant amount of studies (for each electric distribution company (“EDC”)) to determine the market baseline for each measure. This could be very subjective, would change each year, and would vary between each EDC. On the other hand, code baselines are very clear and uniform across Pennsylvania. In addition, if the market baseline is lower (i.e., worse) than the code baseline, EDCs would be providing incentives to customers to bring their energy efficiency up to code. It is not appropriate to use ratepayer
dollars to encourage investment in energy efficiency to meet code. Instead, incentives should be used to achieve greater energy efficiency than is required by code.\(^2\)

The Joint Commentators also aver that “the TRM material on lighting does not allow for any Operation and Maintenance (O&M) benefits.” Joint Commentators Comments, p. 16.

PPL Electric believes that the TRM is not intended to define how to estimate non-electric savings, such as maintenance. Such benefits are accounted for in the TRC calculation, not in the TRM. Therefore, the TRM should not address O&M benefits.

In addition, the Joint Commentators contend that certain measures should be removed from the TRM. For instance, the Joint Commentators aver that televisions should be removed due to low per unit savings and that LED traffic lights should be removed because they are a common practice throughout the country and, as a result, the free-ridership level is high. Joint Commentators Comments, pp. 13, 17-18.

PPL Electric believes that there is no need to remove these measures from the TRM, as it is used to determine gross savings. Even if the savings protocol continues to exist, if the net-to-gross evaluation is too low, the EDCs can drop the specific measures.

Finally, the Joint Commentators recommend “a separate characterization for wi-fi thermostats and/or learning thermostats such as Nest.” Joint Commentators Comments, p. 9. PPL Electric agrees and recommends that an interim measure protocol be added for this new measure (i.e., Smart Thermostats).

\(^2\) PPL Electric further notes that in 2014, the Statewide Evaluator and the Program Evaluation Group (“PEG”) considered “market baselines” and rejected them because they result in net savings.
III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that the Commission take these Reply Comments into consideration in preparing its Final TRM Order.

Respectfully submitted,

Paul E. Russell (ID # 21643)
Kimberly A. Klock (ID # 89716)
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-4254
Fax: 610-774-6726
E-mail: perussell@pplweb.com
kklock@pplweb.com

David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 215-320-4879
E-mail: dmacgregor@postschell.com

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6052
Fax: 717-731-1985
E-mail: dryan@postschell.com

Of Counsel:
Post & Schell, P.C.

Date: May 21, 2015

Attorneys for PPL Electric Utilities Corporation