

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 13, 2009

James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: West Penn Power d/b/a Allegheny Power Company  
Consumer Education Plan for 2008-2012 Submitted  
in Compliance with May 10, 2007, Final Order at  
Docket No. M-00061957  
(entered on May 17, 2008)  
Docket No. M-2008-2032275

Dear Secretary McNulty:

Enclosed for filing are Comments of the Office of Consumer Advocate, in the above-referenced proceeding. A copy of this document has been filed using eFiling; the eFiling confirmation sheet is enclosed.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Christine Maloni Hoover" followed by a stylized initial "CJM".

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026

Enclosures

cc: Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

West Penn Power d/b/a Allegheny Power	:		
Company Consumer Education Plan for	:		
2008-2012 Submitted in Compliance with	:	Docket No.	M-2008-2032275
May 10, 2007, Final Order at Docket No.	:		
M-00061957(entered on May 17, 2008)	:		

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COMMENTS OF THE  
OFFICE OF CONSUMER ADVOCATE

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**I. Background**

On April 3, 2009, Allegheny Power submitted its second set of education materials to the Office of Consumer Advocate (OCA) and others. These materials included a Power Point presentation, an energy timeout information card and a magnet illustration. These education materials are designed to comply with the Public Utility Commission's (PUC or Commission) Order approving Allegheny Energy's consumer education plan (Order entered July 18, 2008 at Docket No. M-2008-2032275).

The Allegheny Power Plan proposed an extensive and comprehensive series of communications that would be coordinated in bill inserts, newspaper advertisements, radio advertisements, CBO outreach, and direct mail. As part of its proposed Plan, Allegheny committed to a "winter" and "summer" segments, all of which would disseminate the eight Commission-approved Education Standards to its customers. To date, the OCA has reviewed

and commented on the first set of material prepared by Allegheny that consisted of radio spots. The OCA now provides its comments on this second set of materials.

## **II. General Comments**

Viewing the education materials in isolation makes it difficult to determine whether the materials adequately contribute to meeting all of the eight education standards specified by the Commission. The materials in the second set include information about the end of the rate cap, but mostly contain tips and education initiatives as to how customers can change their behavior to reduce consumption or to invest in energy star appliances. It is difficult to determine whether the consumer education materials, as a whole, meet the PUC's eight education standards when only reviewing separate parts of the education initiative. It may be more useful to wait until all of the materials are ready and view them as a complete set. The OCA would also note that no cost information has been submitted with the materials.

## **III. Specific Comments**

The OCA found the postcard and refrigerator magnet to be acceptable communication for the purpose of providing some quick, simple information to customers about energy efficiency and controlling the size of a customer's electric bill. As to the Power Point presentation, which is targeted to community based organizations (CBOs) and low income customers the, OCA found it to be generally informative for the target audience but was concerned that it does not contain any information about Allegheny Power's low income programs. Any messages directed to low income customers or CBOs should include specific information about these programs. Additionally, the Power Point does not provide the date that rate caps will end. The

OCA recommends that the Power Point for CBOs and low income customers be supplemented with information and descriptions of the low income program and information on the end date of Allegheny's rate cap.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

West Penn Power d/b/a Allegheny Power :  
Company Consumer Education Plan for :  
2008-2012 Submitted in Compliance with : Docket No. M-2008-2032275  
May 10, 2007, Final Order at Docket No. :  
M-00061957(entered on May 17, 2008) :

I hereby certify that I have this day served a true copy of the foregoing document, Comments of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 13<sup>th</sup> day of April 2009.

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