

GREEN CONDOMINIUM INITIATIVE  
c/o Joan Batory  
2401 Pennsylvania Avenue, #15B33  
Philadelphia, PA 19130  
Tel: 215.769.8530  
Fax: 215.769.1283  
Email: jbatory@comcast.net

August 6, 2009

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Administrative Law Judge  
Honorable Marlane R. Chestnut  
1302 Philadelphia Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130

Anthony E. Gay  
PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Dear Mr. McNulty:

We are writing today on behalf of the Green Condominium Initiative (“GCI”) in connection with our comments to the Petition of PECO Energy Company (“PECO”) for approval of its Energy Efficiency and Conservation Plan (the “Plan”) under the Pennsylvania Public Utility Commission’s Order, entered January 16, 2009. GCI is an all-volunteer coalition comprised of Greater Philadelphia area residential condominium and co-op owners that works closely with the Center for Environmental Policy of the Academy of Natural Sciences and is dedicated to promoting environmental and economic sustainability at its members’ buildings. The following are our GCI’s comments to PECO’s Petition for your consideration:

- The 2% annual cost cap for the Plan should reflect a reasonable return to PECO to cover its actual administrative costs and other necessary capital outlays so as not to place the burden of paying for all or a bulk of the Plan on PECO’s customers to recoup more than those costs.
- Residential CFL Distribution:

- Retailer Discount Coupons - Customers should be able to purchase all types and wattages of CFL bulbs including 3-way bulbs.
  - Give Away Event: Bulbs given away should include a variety of the most commonly used wattages and types of bulbs, including 3-way bulbs to insure they are used.
  - The Commission should review the Plan's charge formula for residential customers using CFL bulbs to insure that the estimate net savings per year provides a fair return to the customer and not a windfall to the company.
- 
- Rebate per KWH Demand Reduction formula: PECO should calculate its proposed fixed- and custom-rebates to its commercial/industrial customers (which includes condominiums and co-ops) who install fuel-switching and/or energy efficient equipment so that it is attractive for such customers to perform such installations. It would also be helpful if the rebate application process was kept straightforward and simple and rebates for projects completed this year prior to Commission approval were made retroactive.
  
  - Energy efficiency jobs: PECO should strive to create programs that will create jobs in the energy efficiency field. Note: the New Jersey Board of Public Utilities recently approved energy efficiency investment proposals for three of the state's major utilities that are expected to spur job growth and provide a major boost to the state's economy. The more than \$225 million investment in energy efficiency is estimated to create nearly 1,000 new jobs over the next 18 months.

Thank you for your consideration. If you have any questions, please feel free to contact us.

Sincerely,

Joan Batory  
Francesca Toscani  
Lynne Cohen  
Susan Thompson  
Fran Pollack  
Rob Shulman  
(GCI Steering Committee for Consideration of PECO Plan)