RHOADS & SINON LLP

Scott H. DeBroff, Esq.

Phone: (717) 237-6716
Fax: (717) 237-6790
sdebroff@rhoads-sinon.com

FILE NO: 11616/02

August 28, 2009

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

Re: Docket No. M-2009-2093215 – Petition of PECO Energy Company for Approval of its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of its Compact Fluorescent Lamp Program

Dear Mr. McNulty:

Enclosed herewith please find an original and three (3) copies of the "**Main Brief on Behalf of EnerNOC, Inc.**" in the above captioned proceeding. Please enter this into the docket and timestamp the additional five (5) copies. A copy of the Brief will also be served to the parties on the service list.

Should you have any questions, please do not hesitate to contact me at (717) 233-5731.

Sincerely,

RHOADS & SINON LLP

By: [signature]
Scott H. DeBroff, Esq.

Enclosures

cc: Service List for Docket M-2009-2093215

753043.1

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS ACT 129 ENERGY EFFICIENCY AND CONSERVATION PLAN AND EXPEDITED APPROVAL OF ITS COMPACT FLUORESCENT LAMP PROGRAM	DOCKET NO. M-2009-2093215

MAIN BRIEF ON BEHALF OF ENERNOC, INC.

SCOTT H. DEBROFF, ESQUIRE
ALICIA R. PETERSEN, ESQUIRE
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146

TEL: (717) 233-5731
FAX: (717) 231-6626
EMAIL: SDEBROFF@RHOADS-SINON.COM
APETERSEN@RHOADS-SINON.COM

DATED: AUGUST 28, 2009

COUNSEL FOR ENERNOC, INC.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

STATUTES

I. INTRODUCTION

EnerNOC, Inc. ("EnerNOC"), a leading demand response ("DR") and energy management services provider throughout the United States, appreciates the opportunity to offer comments on PECO Energy Company's ("PECO" or "Company") Petition for Approval of its Act 129 Energy Efficiency and Conservation Plan ("Petition"). As discussed in more detail herein, EnerNOC supports several aspects of PECO's Petition, specifically regarding its DR Aggregator Contracts Program, but also offers some recommended enhancements to that program to improve the potential for realizing Act 129's objectives in PECO's service territory.

EnerNOC currently manages over 3,150 MW of demand response resource capability from over 2,400 customers across 5,450 sites nationwide. As an active demand response provider across three Independent System Operators ("ISOs") or Regional Transmission Organizations ("RTOs") (*i.e.*, New York Independent System Operator, Inc., ISO New England, Inc., and PJM) and numerous states with various statutory and regulatory regimes, EnerNOC has a broad base of experience on which to draw and, as a result, has a unique perspective to offer in this proceeding. EnerNOC also has signed contracts with a variety of utilities to provide demand response services, including Southern California Edison, Pacific Gas & Electric, San Diego Gas & Electric, the Tennessee Valley Authority, Tampa Electric Company, Public Service Company of New Mexico, Xcel Energy (Colorado), Salt River Project, Idaho Power, Allegheny Power, Baltimore Gas and Electric, Delmarva Power and PEPCO.

EnerNOC's demand response activities are implemented via automated, aggregated, and intelligent management of end-user lighting, HVAC, distributed generation, and industrial process equipment. Every one of EnerNOC's thousands of sites is connected to its Network Operations Center (the "NOC" in EnerNOC) and communicates real-time load data over a secure

Internet connection, allowing its operations staff to monitor and verify facility load reductions in real time. This customer visibility allows EnerNOC to ensure that customers are delivering their contracted reductions and where they are not to take efforts to "coach" them, or to dispatch technicians to take corrective action. As a result, EnerNOC dispatched emergency demand response resources in its network over 100 times during 2008 and delivered performance that averaged over 100% during the year, based on nominated versus delivered capacity.

II. PROCEDURAL HISTORY

Governor Rendell signed into law House Bill 2200, or Act 129 of 2008 ("Act 129" or "Act"), on October 15, 2008. Among other things, Act 129 expands the Pennsylvania Public Utility Commission's ("PUC" or "Commission") oversight responsibilities and sets forth new requirements on electric distribution companies ("EDCs") for energy conservation. With regard to energy efficiency and conservation, Act 129 requires EDCs to adopt a plan, approved by the Commission, to reduce electric consumption by at least 1% of its expected consumption for June 1, 2009, through May 31, 2010, and by at least 3% by May 31, 2010, adjusted for weather and extraordinary loads.[1] In addition, by May 31, 2013, peak demand is to be reduced by a minimum of 4.5% of the EDC's annual system peak demand in the 100 hours of highest demand,[2] measured against the EDC's peak demand during the period of June 1, 2007 through May 31, 2008.[3] Consistent with the Act's requirements, on July 1, 2009, all Pennsylvania EDCs filed

[1] This one percent reduction is to be accomplished by May 31, 2011. *See* 66 Pa. C.S. § 2801.6(c)(1), (2).
[2] Consistent with the Commission's January 16, 2009, *Energy Efficiency and Conservation Plan Implementation Order* at Docket No. M-2008-2069887 (hereinafter "Implementation Order"), the Commission has adopted the use of 4.5% of the EDC's average of the 100 highest peak hours during the summer months of June, July, August and September in 2007. Implementation Order, p. 21.
[3] *See* 66 Pa C.S. § 2806.1(d)(1).

with the Commission proposed energy efficiency and conservation plans ("EE&C Plan") that seek to meet the Act's energy efficiency and conservation requirements.

On January 16, 2009, the Commission issued an Implementation Order ("Implementation Order") establishing the substantive requirements for EDCs in preparing and submitting their EE&C Plans and outlining the process by which the Commission will consider and review the EE&C Plans. As articulated in the Implementation Order, the PUC review process is structured in a way that "balances the desire to provide all interested parties an opportunity to be heard, with the need to complete the process within the statutory time constraints."[4]

As required by the Implementation Order, on July 1, 2009, the Company submitted its Petition.

On August 3, 2009, EnerNOC filed a Petition to Intervene in this proceeding. On August 7, 2209, EnerNOC filed its initial comments in this proceeding. EnerNOC is an energy services provider operating throughout the United States, including the Commonwealth of Pennsylvania, and Canada. EnerNOC operates specifically in the Commonwealth of Pennsylvania as a Curtailment Service Provider ("CSP") within the footprint of PJM Interconnection, L.L.C. ("PJM").[5] As a PJM Curtailment Service Provider, EnerNOC provides commercial, industrial and institutional organizations with demand response and energy efficiency services. By letter issued July 2, 2009, the PUC also approved EnerNOC's APECOication to Register as a Conservation Service Provider.[6]

Consistent with the procedural schedule for this proceeding, EnerNOC is submitting this Brief in order to address its positions and concerns regarding the Company's Petition.

---

[4] Implementation Order, p. 10.

[5] In this context, a Curtailment Service Provider refers to a PJM Member, "which action on or behalf of itself or one or more other Members or non-Members, participates in the PJM Interchange Energy Market by causing a reduction in demand." *See* PJM Operating Agreement, § 1.3.1B.02, *available at* www.pjm.com.

[6] *See generally* Docket No. A-2009-2102368.

III. DESCRIPTION OF PECO'S PLAN

To fulfill the requirements of Act 129, PECO's Petition proposes to fulfill the requirements of Act 129 through the implementation of 18 energy efficiency and demand reduction programs for Residential, Small Commercial and Industrial ("C&I"), Large C&I, and Governmental ("Municipal Lighting") customer classes.[7] Of these, PECO has targeted (or overlapped) ten programs for Residential customers; ten programs for Small C&I customers; ten programs for Large C&I customers; and one program for Municipal Lighting customers.

IV. SUMMARY OF ARGUMENT

As stated previously, EnerNOC generally supports PECO's DR Aggregator Contracts program and commends its focused and cost-effective nature. In particular, EnerNOC supports the Company's plan to leverage existing PJM demand response programs and participation and recognizes the incentives required to deliver sufficient levels of capacity necessary to realize PECO's Act 129 goals. EnerNOC also commends PECO's proposal to phase in the program over a period of three years and to provide incentives during the years leading up to and including the summer 2012 period. Notwithstanding the commendable aspects of the DR Aggregator Contracts program, EnerNOC recommends that PECO affirmatively utilize a 50-hour target to maximize the cost efficiency and effectiveness of this proposed demand response initiative. In addition, EnerNOC also believes it would be more cost effect if PECO propose a plan that would

---

7 *See, e.g.,* Exhibit RAS-2, Exhibit accompanying the Direct Testimony of Richard A. Schlesinger.

have the DR Aggregator Contracts program continue to run after the statutory deadline of May 31, 2013.

V. ARGUMENT

A. Act 129's Conservation and Demand Reduction Requirements for Overall Conservation Requirements beyond the 2013 Requirements: EnerNOC Recommends That PECO's Proposed Plan For Its Load Curtailment Program should Continue on Past May 31, 2013.

Each of the EDCs has proposed C&I DR plans that have one thing in common: they all end after the 2012/2013 delivery year. This completely distorts the legislative intent of requiring utilities to achieve a peak load reduction requirement in 2012/2013. The notion that the Legislature would then intend that the utility allow a successful peak load reduction to snap back in the following year is absurd. If that is what is allowed to occur here, the Governor and Legislators, indeed electric customers in the Commonwealth, will be justifiably outraged.

If the pre-Act 129 activities of DR providers are resumed, peak load will snap back to pre-Act 129 levels and the success of Act 129 and the large investments made into the Demand Response programs will be completely erased. Without certainty beyond 2012-2013, Pennsylvania customers will lose the program benefits that flow directly from the direct incentives to participants, specifically the impact of demand reductions on reducing capacity and energy prices.

It is important to consider the impact of certainty on both the cost of delivering C&I DR on an annual basis, and the ability to recruit providers. From a cost standpoint, recruiting and enabling demand response providers requires up-front investment. To the extent that a CSP can amortize these costs over an extended contractual term, the annual incentives required are reduced, thus benefiting all stakeholders. Regarding the EDC's Act 129 requirements, the use of a 3 year program term versus a longer term will likely have the following significant impacts.

First, where prices will be determined through an RFP process, CSPs will likely require higher incentives for a 3 year (or shorter) contract term than for a 5 to 7 year term, for example. There are business decisions made by the CSP to invest time and resources in a program, and the utility commitment for a longer term makes a difference.

Second, where prices have been set through the Act 129 planning process, the capacity available to the EDC will be impacted by term length, with less capacity available for a 3 year (or shorter) term than for a 5 to 7 year contract.

From a Demand Response participant's perspective, length is also an important consideration. Particularly in EDC territories where participants can receive attractive PJM payments for participation in emergency-only programs, the desirability of providing 50 to 100 hours of dispatch will be weighed against the potential incentive stream over the life of a program. A participant must consider the impact of the business process changes required for 50 to 100 hours of dispatch, and weigh that impact against either 1-3 years of compensation, or weigh that impact against 5-7 years or more of compensation. The longer option (5-7 years or more of certain incentives) will deliver more providers, and therefore more capacity.

Furthermore, Act 129 states that the proposed cost-recovery tariff mechanism for the plans will only allow recovery of the "prudent and reasonable costs of the plan including administrative costs." 66 Pa. C.S. §2806.1. EDCs in the Commonwealth are charged with making prudent investments. It would not be "prudent or reasonable" for the utility to invest money in a short term program that would eventually have to be expanded again at higher costs and ultimately result in greater expenses for the ratepayers. It would be prudent if the program was originally designed to go on for a longer initial period.

In regards to demand reduction, Act 129 indicates that as long as it is cost effective, the Commission can allow for continued reductions of peak demand:

> By November 30, 2013, the Commission shall compare the total costs of energy efficiency and conservation plans and capacity costs to retail customers in this Commonwealth or other costs determined by the Commission. If the Commission determines that the benefits of the plans exceed the costs, the commission shall set additional incremental requirements for reduction in peak demand for the 100 hours of great demand or an alternative reduction approved by the Commission. Reductions from demand shall be measured from the Electric Distribution Company's peak demand for the period from June 1, 2011 through May 31, 2012. The reduction in consumption required by the Commission shall be accomplished no later than May 31, 2017.
>
> 66 Pa. C.S. 2806.1.

It appears thus that the intent of the Legislature was to have the EDCs maintain their status quo while the potential for further reductions was assessed. Unlike energy efficiency investments, demand response programs will only work if the EDCs initiate an active role. It would be prudent and most beneficial to the ratepayers if the EDCs maintained the current demand response and peak load reductions during the time of the Commission review. If these levels are not maintained, the EDCs will have to incur more costs to meet the new requirements beyond the 4.5% demand reduction goal for 2013.

Furthermore, other elements of the EE&C plan, like smart meters that work in conjunction with the Load Control Program will continue to be in service long after the May 31, 2013 deadline. Ultimately, PECO will be modernizing its entire infrastructure, like much of the rest of the country, in order to develop and support a Smart Grid. To achieve a Smart Grid, it will take a combination of programs and technology. Energy Efficiency Programs and Demand

Response Programs work together in the same demand side management spectrum, and in conjunction with Smart Metering, which contributes the platform for measurement, verification and evaluation of such programs. With this Commonwealth's commitment to the deployment of advanced metering and the creation of a Smart Grid, there is every reason to infer that the Demand Response and Energy Efficiency programming once started, was meant to endure. It will be more cost effective to plan now for the continuation of a program that will be important to aid in these future reductions that the Commission may require.

Finally, it is important to note that most programs envision resources enrolled in both the EDC Act 129 program and PJM demand response programs. As the PJM Base Residual Actions (BRA) for 2013-2014 approaches, it is possible that CSPs will consider their ability to enroll those resources in Act 129 programs when determining capacity commitment levels. The absence of such an assurance will reduce the demand response capacity available for the 2013-2014 and subsequent BRAs, impacting prices in the PJM market to the detriment of Pennsylvania rate-payers.

The Commission should state its expectation that demand reductions achieved by the summer of 2012 will continue to persist for some reasonable period of time and certainly through its consideration of the second phase of Act 129. Second, it should provide the EDCs with assurances that prudently incurred costs for demand response not in excess of those expended in 2012, will be recoverable on a full and current basis until such time as the Commission determines otherwise. By the same token, the Commission should make clear that imprudently incurred costs will not be recoverable.

We are encouraged by the law in this Commonwealth that recognizes the importance of a well-planned and effective Demand Response Program as a component of a well-planned and effective overall Act 129 implementation. We contend that the conservation of energy requires effective programming that lasts and we encourage this Commission to see the forest through the trees.

B. Cost Issues: EnerNOC supports PECO's Cost Recovery Mechanism

EnerNoc supports PECO's proposal to recover the costs of its EE&C Plan through an Energy Efficiency & Conservation Program Charge ("EEPC") that will be imposed under Section 1307 of the Public Utility Code and will be reconcilable and non-bypassable.

C. CSP ISSUES

1. EnerNOC Recommends that PECO's DR Aggregator Contracts Program Utilizes a 50-Hour Target As a Realistic and Cost-Effective Approach.

In its DR Aggregator Contracts program, PECO proposes to establish performance contracts with PJM CSPs to recruit PECO customers and deliver the demand reduction target. The proposed program would commit to offer combined load reduction resources to PECO during hours of peak demand coincident with the top 100 peak hours. At the same time, PECO recognizes that, in order to manage the uncertainties associated with estimating the top 100 peak hours, it may be appropriate to utilize a 50-hour target instead of 100.[8] EnerNOC recommends that PECO's program be modified to utilize a 50-hour target from the outset.

In EnerNOC's view, a 50-hour target in the DR Aggregator Contracts program has two distinct advantages. First, the 50-hour target reflects a realistic assessment of the uncertainty

[8] *See* PECO EE&C Plan, at 171.

associated with accurately predicting the top 100 peak load hours and obtaining capacity related to C&I load. By affording a more reasonable "cushion," PECO and the curtailment service provider will be better positioned to assure that the hours dispatched occur within PECO's top 100 hours. Second, it is EnerNOC's experience across several markets that the cost to induce customer response, relative to the hours of response sought, is non-linear. In other words, the cost of having 100 MW of customers respond for 100 hours will far exceed the cost of having 200 MW of customers respond for 50 hours. With this important modification, PECO's proposed program is not only more likely to achieve Act 129's goals but also serves as a cost-effective approach for doing so.

2. PECO's Proposal To Coordinate with PJM Demand Response Programs Maximizes Value to PECO and Its Customers.

In its EE&C Plan, PECO proposes to coordinate its DR Aggregator Contracts Program with PJM's demand response programs.[9] Leveraging this existing PJM infrastructure will maximize value to PECO and its customers by delivering reliable, cost-effective capacity through a proven, established program. Under this approach, sites already registered in the PJM Emergency Load Response Program may also be attracted to participate in the DR Aggregator Contracts Program in exchange for an incremental incentive, thereby increasing the opportunity for participation. Given the potential efficiencies to be gained by leveraging the PJM demand response program "infrastructure," EnerNOC supports PECO's plan in this important regard.

---

[9] *See id.*

3. PECO Appropriately Recognizes the Incentives Required To Contribute Meaningfully Toward Its Act 129 Goals.

In its EE&C Plan, PECO appropriately recognizes the substantial incentives required to deliver sufficient levels of capacity to contribute meaningfully toward its Act 129 goals.[10] Based on EnerNOC's experience, serving as a CSP in multiple markets, the incentives contemplated in PECO's DR Aggregator Contracts program budget reflect realistic incentive requirements for the delivery of reliable capacity available for dispatch, assuming that PECO continues to intend for its proposed budget to represent incremental incentives to existing PJM demand response incentives, in exchange for additional dispatch for over 50 years responsibilities toward PECO's Act 129 goal. Accordingly, EnerNOC supports Commission approval of this component of PECO's EE&C Plan as instrumental to PECO achieving its statutory objectives.

[10] *See id.* at 174.

VI. CONCLUSION

For all of the foregoing reasons as well as the reasons expressed in EnerNOC's initial comments, EnerNOC proposes that these changes be made to PECO's EE&C Plan.

VII. PROPOSED ORDERING PARAGRAPHS

IT IS ORDERED:

1. That PECO's Load Curtailment Program be structured in a way in which it can continue on successfully after the statutory deadline of May 31, 2009.

Respectfully submitted,

By: __________________________

SCOTT H. DEBROFF, ESQUIRE
Attorney ID No. 61170
ALICIA R. PETERSEN, ESQUIRE
Attorney ID No. 209672

RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146

TEL: (717) 233-5731
FAX: (717) 231-6626
EMAIL: SDEBROFF@RHOADS-SINON.COM
EMAIL: APETERSEN@RHOADS-SINON.COM

DATED: AUGUST 28, 2009

COUNSEL FOR ENERNOC, INC.

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS ACT 129 ENERGY EFFICIENCY AND CONSERVATION PLAN AND EXPEDITED APPROVAL OF ITS COMPACT FLUORESCENT LAMP PROGRAM	DOCKET NO. M-2009-2093215

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties, listed on the next page, in accordance with the requirements of §1.54 (relating to service by a party).

Dated: **August 28, 2009**

By: ______________________

SCOTT H. DEBROFF, ESQUIRE
ALICIA R. PETERSEN, ESQUIRE
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
P.O. BOX 1146
HARRISBURG, PA 17108-1146

TEL: (717) 233-5731
FAX: (717) 231-6626
EMAIL: SDEBROFF@RHOADS-SINON.COM
EMAIL: APETERSEN@RHOADS-SINON.COM

COUNSEL FOR ENERNOC, INC.

CERTIFICATE OF SERVICE – M-2009-2093215

VIA EMAIL AND FIRST CLASS MAIL

ROMULO DIAZ, ESQ. ANTHONY E. GAY, ESQ. EXELON BUSINESS SERVICES COMPANY 2301 MARKET STREET, S23-1 P.O. BOX 8699 PHILADELPHIA, PA 19101-8699 ROMULO.DIAZ@EXELONCORP.COM ANTHONY.GAY@EXELONCORP.COM	DANIEL G. ASMUS, ESQ. OFFICE OF SMALL BUSINESS ADVOCATE COMMERCE BUILDING, SUITE 1102 300 N. SECOND STREET HARRISBURG, PA 17101 DASMUS@STATE.PA.US
THOMAS P. GADSDEN, ESQ. KENNETH M. KULAK, ESQ. ANTHONY C. DECUSATIS, ESQ. MORGAN LEWIS & BOCKIUS LLP 1701 MARKET STREET PHILADELPHIA, PA 19103-2921 TGADSDEN@MORGANLEWIS.COM KKULAK@MORGANLEWIS.COM ADECUSATIS@MORGANLEWIS.COM	TANYA MCCLOSKEY, ESQ. JENNEDY S. JOHNSON, ESQ. OFFICE OF CONSUMER ADVOCATE 555 WALNUT STREET 5TH FLOOR, FORUM PLACE HARRISBURG, PA 17101 TMCCLOSKEY@PAOCA.ORG JJOHNSON@PAOCA.ORG
RICHARD A. KANASKIE, ESQ. CARRIE B. WRIGHT, ESQ. PENNSYLVANIA PUBLIC UTILITY COMMISSION OFFICE OF TRIAL STAFF P.O. BOX 3265 HARRISBURG, PA 17105-3265 RKANASKIE@STATE.PA.US CARWRIGHT@STATE.PA.US	J. BARRY DAVIS, ESQ. SCOTT SCHWARZ, ESQ. CITY OF PHILADELPHIA LAW DEPARTMENT 1515 ARCH STREET, 16TH FLOOR PHILADELPHIA, PA 19102 J.BARRY.DAVIS@PHILA.GOV SCOTT.SCHWARZ@PHILA.GOV
ROGER CLARK, ESQ. THE REINVESTMENT FUND SUSTAINABLE DEVELOPMENT FUND 718 ARCH STREET, SUITE 300 NORTH PHILADELPHIA, PA 19106 ROGER.CLARK@TRFUND.COM	JONATHAN STEIN, ESQ. PHILIP BERTOCCI, ESQ. THU B. TRAN, ESQ. COMMUNITY LEGAL SERVICES INC. 1424 CHESTNUT STREET PHILADELPHIA, PA 19103 JSTEIN@CLSPHILA.ORG PBERTOCCI@CLSPHILA.ORG TTRAN@CLSPHILA.ORG

Charles McPhedran, Esq. John Baillie, Esq. PennFuture 1518 Walnut Street, Suite 1100 Philadelphia, PA 19102 MCPHEDRAN@PENNFUTURE.ORG BAILLIE@PENNFUTURE.ORG	Harry S. Geller, Esq. John C. Gerhard, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 HGELLERPULP@PALEGALAID.NET JGERHARDPULP@PALEGALAID.NET
Daniel Clearfield, Esq. Kevin J. Moody, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor P.O. Box 1248 Harrisburg, PA 17108-1248 DCLEARFIELD@ECKERTSEAMANS.COM KMOODY@ECKERTSEAMANS.COM	Scott Perry, Esq. Aspassia V. Staevska, Esq. Commonwealth of Pennsylvania Department of Environmental Protection RCSOB, 9th Floor 400 Market Street Harrisburg, PA 17101-2301 SCPERRY@STATE.PA.US ASTAEVSKA@STATE.PA.US
Christopher A. Lewis, Esq. Christopher R. Sharp, Esq. Melanie J. Tambolas, Esq. Blank Rome, LLP One Logan Square Philadelphia, PA 19103 LEWIS@BLANKROME.COM SHARP@BLANKROME.COM TAMBOLAS@BLANKROME.COM	George Jugovic, Esq. Assistant Counsel Commonwealth of Pennsylvania Department of Environmental Protection 400 Waterfront Drive Pittsburg, PA 15222-4745 GJUGOVIC@STATE.PA.US
Daniel Ocko, Esq. Office of Representative Mark B. Cohen House Democratic Caucus 128 Main Capital P.O. Box 2020274 Harrisburg, PA 17120 DOCKO@PAHOUSE.NET	Barry Seymour Executive Director Delaware Valley Regional Planning Commission 190 N. Independence Mall West, 8th Floor Philadelphia, PA 19106-1520 BSEYMOUR@DVRPC.ORG
Susan E. Bruce, Esq. Vasiliki Karandrikas, Esq. McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 SBRUCE@MWN.COM VKARANDRIKAS@MWN.COM	Charis Mincavage, Esq. Barry A. Naum, Esq. Shelby Linton-Keddie, Esq. McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 CMINCAVAGE@MWN.COM BNAUM@MWN.COM SKEDDIE@MWN.COM

CHERYL WALKER DAVIS JONATHAN NASE KATHRYN SOPHY OFFICE OF SPECIAL ASSISTANTS COMMONWEALTH KEYSTONE BUILDING 3RD FLOOR, 9 EAST HARRISBURG, PA 17120 CWALKERDAV@STATE.PA.US JNASE@STATE.PA.US KSOPHY@STATE.PA.US.	THE HONORABLE MARLENE R. CHESTNUT ADMINISTRATIVE LAW JUDGE COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION 801 MARKET STREET, SUITE 4063 PHILADELPHIA, PA 19107 MACHESTNUT@STATE.PA.US KNIESBOREL@STATE.PA.US