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November 8, 2012

Rosemary Chiavetta, Esq., Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Reply Comments of the Energy Association of Pennsylvania
to Proposed 2013 Annual Update to the Technical Reference Manual
(Dockets M-2012-2313373 and M-00051865)**

Dear Secretary Chiavetta,

On behalf of its electric distribution company (“EDC”) members subject to the Act 129 energy efficiency and conservation program, the Energy Association of Pennsylvania (“EAP”) joins in the reply comments filed by PECO Energy Company to the proposed 2013 Annual TRM Update.

EAP further notes that, in addition to the unavailability of comments allegedly filed by CLEAResult and referenced by KEEA in its reply comments, comments filed by at least two of EAP’s members were not posted on the website until the afternoon of Tuesday, November 6, 2012. EAP recognizes that the Pennsylvania Public Utility Commission (“Commission”) was closed on October 29 and 30 due to the effects of Hurricane Sandy and believes that additional time for filing reply comments may have been warranted and beneficial to all stakeholders.

In general, EAP suggests that the time for filing reply comments should regularly include a period of time (i.e., 2-3 days) for the posting of comments on the website by the Commission. Providing a few additional days in the reply comment period would assure that all comments filed, whether by mail or electronically, have been posted for review by all stakeholders and interested parties.

Very Truly Yours,

A handwritten signature in blue ink that reads 'Donna M.J. Clark'.

Donna M.J. Clark
Vice President & General Counsel

cc: Megan Good (via electronic mail to megagood@pa.gov)
Kriss Brown (via electronic mail to kribrown@pa.gov)