

To: *Secretary's Bureau*
From: Robert Altenburg, Citizens for Pennsylvania's Future
Re: Docket No. M-2014-2401345

Date: 7 March, 2014

Please accept these comments submitted in response to the Commission's Tentative Order regarding Investigation of Pennsylvania's Retail Electricity Market: Joint Electric Distribution Company — Electric Generation Supplier Bill.

Sincerely,

Robert C. Altenburg

Robert C. Altenburg, Esq.

PA ID No. 209540

Email: altenburg@pennfuture.org

Phone: (717) 214-7933

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Investigation of Pennsylvania’s Retail Electricity Market:
Joint Electric Distribution Company —
Electric Generation Supplier Bill**)
) **Docket No. M-2014-2401345**
)
)

COMMENTS OF CITIZENS FOR PENNSYLVANIA’S FUTURE

I. Introduction

Citizens for Pennsylvania’s Future (PennFuture) is a non-profit, membership-based environmental advocacy organization focusing on land, air, water, and energy issues that impact Pennsylvania. PennFuture submits these comments in response to the Public Utility Commission’s (Commission) Tentative Order entered on February 6, 2014, docket number M-2014-2401345.

PennFuture recognizes and support’s the Commission’s effort’s to make a more supplier-oriented utility-consolidated bill; however, we believe that limiting this rulemaking to a single issue is not in the best interest of consumers. Recognizing that any changes to the design of the bill will incur costs that will be passed to the consumer, it is more efficient to minimize potential cost increases by considering a broader scope of changes in this action, particularly those that will reduce consumer costs.

In addition to focusing on the supply side and promoting the interests of Electric Generation Suppliers, PennFuture asks the Commission to consider measures to benefit consumers including adding information on utility bills that will put the customers bill in context and encourage voluntary energy efficiency and conservation (EE&C) measures.

II. Benefits

The Commission already has evidence that the levelized cost of EE&C measures is much less expensive than acquisition of additional generation. In the most current annual report released by the independent Act 129 Statewide Evaluator, an Total Resource Cost (TRC) test showed a benefit/cost ratio for EE&C measures was 2.97 to 1.¹ While the test shows direct monetary return of nearly \$3.00 for every dollar spent, this analysis does not attempt to monetize other benefits such as impact on public health and welfare and reduced dependence on foreign energy sources. Because of this, the TRC calculations represent a very conservative estimate of benefits.

¹ Act 129 Statewide Evaluator, *Annual Report Program Year 3: 2011 -- 2012*, at 7 (March 4, 2013)

Providing consumers additional usage information also aligns with the intent of Act 129 of 2008 and the legislative finding that "it is in the public interest to adopt energy efficiency and conservation measures and to implement energy procurement requirements designed to ensure that electricity obtained reduces the possibility of electric price instability, promotes economic growth and ensures affordable and available electric service to all residents."²

The Commission has also independently recognized the value of information in the hands of retail customers. This is even reflected in the Consumer Bill of Rights, which specifies that customers have "The right to receive the benefits of new services, technological advances, improved efficiency and competitive prices" and "*The right to unbiased, accurate and understandable information to help shop for power and to save money in the deregulated environment.*"³

II. Implementation

A. Possible Measures

PennFuture suggests that the bills of retail customers either contain or provide a convenient link to a peer-based comparison of usage. Such a comparison would, ideally, reflect electric consumption at similarly situated buildings in the area operating within the same rate class. Such data would contextualize energy usage and provide consumers with reasonable targets they could voluntarily achieve. By making this information available on the bill it would also strongly couple those targets to the associated dollar savings.

Another component that would provide direct value to the consumer would be a box showing a limited number of strategies the customer could adopt and the average reduction in power and cost savings associated with each. Information on such measures could be drawn from data already prepared by EDCs in support of their Act 129 reporting requirements, thus limiting implementation costs.

B. Costs

While PennFuture recognizes that there will be some cost involved with modifying bills to include the additional information requested, those costs can be minimized by addressing any changes in the current action as opposed to a separate rulemakings.

Also, unlike the tentative order, the suggested additions will encourage consumers to reduce costs. The resulting savings may completely offset the costs incurred to make both the originally proposed changes and the additional requested changes.

² H.B. 2200, Gen. Assem., 2008 Reg. Sess. (Pa. 2008).

³ PA Public Utility Commission, Energy Consumer Bill of Rights. (June 2013) *emphasis added*

PennFuture also notes that conservation service providers are already operating in Pennsylvania that use reporting methods to encourage EE&C.⁴ Because of this, any decision to include such information could be based on actual results that have been achieved.

III. Conclusion

On behalf of its members throughout Pennsylvania, PennFuture urges the Commission to expand the scope of this order and investigate means by which additional information that will encourage voluntary energy efficiency and conservation be provided to retail customers.

⁴ Comments on Behalf of Opower, Inc. in Response to the Act 129 Tentative Implementation Order, Docket No. M-2012-2289411, (June 25, 2012)