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March 16, 2015

VIA EFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

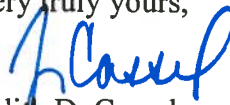
RE: **REPLY COMMENTS OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA** to Comments of the Commission on Economic Opportunity and the Pennsylvania Weatherization Providers Task Force and PP&L Industrial Customer Alliance on the Petition of PPL Electric Utilities Corporation for Approval to Changes in Its Energy Efficiency and Conservation Plan; Docket No. M-2012-2334388

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the Reply Comments of the Sustainable Energy Fund of Central Eastern Pennsylvania. This filing has been served in accordance with the attached Certificate of Service.

If you have any questions concerning this filing, please do not hesitate to contact my office.

Very truly yours,


Judith D. Cassel
*Counsel for The Sustainable Energy Fund of
Central Eastern Pennsylvania*

Enclosures

cc: Administrative Law Judge Dennis J. Buckley (via email and via first class mail)
Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :
Corporation for Approval of Changes to its : Docket No. M-2012-2334388
Phase II Act 129 Energy Efficiency and :
Conservation Plan :

**MOTION TO FILE LATE AND FILE
REPLY COMMENTS OF THE
SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA**

The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, files the following Motion to File Late and File Reply Comments in the above-captioned proceeding.

I. MOTION TO FILE LATE

SEF requests that the Pennsylvania Public Utility Commission (“Commission”) accept these Reply Comments to the Comments filed by the Commission on Economic Opportunity and the Pennsylvania Weatherization Providers Task Force (“Task Force”) and the comments filed by PP&L Industrial Customer Alliance (“PPLICA”) on February 20, 2015 in the matter of PPL Electric Utilities Corporation’s (“PPL”) Petition (“Petition”) for Approval to Change its Act 129 Phase II Energy Efficiency and Conservation Plan (“Phase II EE&C Plan”). SEF’s response is out of time because of transition issues associated with the retirement of SEF’s previous counsel of record in this matter. The need to file Reply Comments, and the passage of the deadline for same, was not apparent to SEF’s new undersigned counsel until the week of March 9, 2015. Given these circumstances, the fact that SEF has been an active participant in these proceedings

to date, and the fact that the focus of these Reply Comments is limited, SEF respectfully requests the Commission to accept these Reply Comments.

II. PROCEDURAL HISTORY

Following examination of PPL's Phase II EE&C Plan and an evidentiary hearing, the Commission approved the Phase II EE&C Plan, with modifications, on March 14, 2013. The Commission approved PPL's compliance filing on July 11, 2013.¹ The Commission approved revisions to PPL's Phase II EE&C Plan on March 6, 2014. (Order Entered Mar. 6, 2014). On January 21, 2015, PPL filed the present Petition requesting 22 major and minor changes to its Phase II EE&C Plan. After the Commission reviews comments and reply comments filed, it will determine whether the matter should be referred to the Office of Administrative Law Judge for a hearing.

SEF submits these comments in response to the Task Force and PPLICICA's comments to the Petition.

III. REPLY COMMENTS

SEF supports or does not oppose the majority of PPL's proposed changes. SEF specifically supports PPL's proposed changes Nos. 3, 5, 13, and 15. SEF offers no comment on PPL's proposed changes Nos. 1, 2, 4, 6-8, 10-12, and 14. However, SEF cannot support the proposed modification No. 9, the replacement of non-electric heating equipment with heat pumps, because the likely outcome of such a change would be counter-productive to the goals of Act 129 and the Phase II EE&C Plan. SEF encourages the Commission to approve the changes that SEF supports or does not oppose, but urges the Commission to further review the change proposed as No. 9

¹ Petition of PPL Electric Utilities Corporation for Approval of its Phase II Act 129 Energy Efficiency and Conservation Plan, Docket No. M-2012-2334388 (Order Entered July 11, 2013).

a. Modifications supported or not opposed

PPLICA opposes PPL's change No. 15 as granting "unreasonably broad discretion to the Company." SEF disagrees. The pilot measures embodied in No. 15 will likely deepen energy savings in preparation for Phase III of Act 129. SEF encourages PPL to conduct a digital thermostat pilot for homes with electric baseboard heat. Most homes with electric baseboard heat have simple analog thermostatic controls that lack accuracy and feedback for users. These analog controls are unable to automatically reduce space temperature during typical setback periods such as unoccupied periods or nighttime. Programmable thermostats are readily available for electric baseboard heat and can provide significant savings for renters and homeowners, alike. This type of technology could provide needed relief if extended to low income homeowners and renters during the coldest months of the year.

For the same reasons, SEF supports PPL's modification No. 5, the addition and modification of incentives to achieve savings beyond lighting, whether those savings are achieved from greater use of efficient equipment, improvements to the building envelope or use of renewable resources. SEF also supports the concept of "energy efficiency home makeovers."

Modifications opposed

SEF agrees with the Task Force that, although PPL Electric's commitment to WRAP is admirable, this "de facto" heating pilot would merely replace non-electric heating equipment with electric heat pumps. Heat pumps are efficient during months with mild temperatures but, as outdoor temperatures drop, heat pumps become less efficient. During the coldest months, heat pumps rely on electric resistance heat to warm the air. This is akin to having centralized electric baseboard heat -- the most expensive and least environmentally friendly form of heating for those coldest months, primarily January and February. Utilization of electric resistance heat

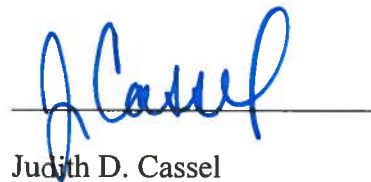
during these cold months adds significantly to the winter peak load and the customers' utility bills.

These customers would be better served through replacement of their existing heating system with one that uses the same fuel or preferably biomass or propane. Although propane prices rise during the winter months, it is still less expensive and more environmentally friendly to heat with propane than electric resistance heat. SEF is concerned that this is a load-building program similar to the all-electric home masquerading as a program to help those in need.

IV. CONCLUSION

The Sustainable Energy Fund respectfully requests the Commission accept these Reply Comments out of time and consider and adopt them in making decisions concerning PPL Electric's Petition for Approval to Change its Act 129 Phase II Energy Efficiency and Conservation Plan.

Respectfully submitted,



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Dated: March 16, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

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Dated: March 16, 2015