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File #: 158814

August 10, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Energy Efficiency and Conservation Program
Docket No. M-2014-2424864

Dear Secretary Chiavetta:

Enclosed for filing are the Comments of PPL Electric Utilities Corporation on the Phase III Energy Efficiency and Conservation Plan Template, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

cc: Certificate of Service

AMENDED CERTIFICATE OF SERVICE
(Docket No. M-2014-2424864)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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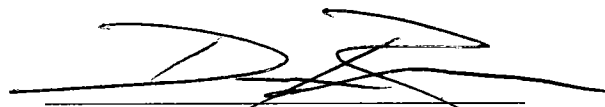
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Date: August 10, 2015



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and Conservation : Docket No. M-2014-2424864
Program :

**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION ON
THE PHASE III ENERGY EFFICIENCY AND
CONSERVATION PLAN TEMPLATE**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

By Secretarial Letter dated July 21, 2015, the Pennsylvania Public Utility Commission (“Commission”) requested comments on the proposed Phase III Energy Efficiency and Conservation (“EE&C”) Plan filing template.¹ PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) has actively participated in all of the proceedings instituted by the Commission to implement Act 129 of 2008, P.L. 1592, 66 Pa.C.S. §§ 2806.1-2806.2 (“Act 129”). The Company appreciates this opportunity to comment on the Commission’s proposed Phase III EE&C Plan Template.

PPL Electric generally agrees with most of what is proposed in the Phase III EE&C Plan Template. However, as detailed below, the Company has one comment that seeks some clarification as to what is required in its Phase III EE&C Plan.

II. COMMENTS ON THE PHASE III EE&C PLAN TEMPLATE

PPL Electric Utilities has one comment on the Phase III EE&C Plan Template. Section 3.2 of the Phase III EE&C Plan Template mandates that the Residential Sector Programs are to


¹ *Energy Efficiency and Conservation Program, Implementation of Act 129 of 2008—Phase III Energy Efficiency and Conservation Plan Template, Docket No. M-2014-2424864 (July 21, 2015) (“Phase III EE&C Plan Template”).*

include formatted descriptions of each program organized under specified headings. In the second to last bullet on page 4, one of those headings is “Cost-effectiveness – include TRC and net-to-gross (NTG) ratio for each program.” Phase III EE&C Plan Template, Section 3.2 (footnote omitted). In PPL Electric’s current Phase II EE&C Plan, there are only charts depicting gross savings. Consequently, PPL Electric interprets this requirement to mean that in Section 3.2 of its Phase III EE&C Plan, an additional chart shall be added for each program that shows savings on a net-to-gross basis. In other words, there would be two charts: one chart on a gross basis and another on a net-to-gross basis. Furthermore, PPL Electric will add a net-to-gross basis chart when any other charts in the Phase III EE&C Plan only show gross savings, specifically in Section 7, including Table 7A. If PPL Electric’s interpretation is incorrect, PPL Electric requests that the Commission provide that clarification in the final Phase III EE&C Plan Template.

III. CONCLUSION

For all of the reasons stated above, PPL Electric Utilities Corporation requests that the Pennsylvania Public Utility Commission consider its comments in the development of the Phase III Energy Efficiency and Conservation Plan filing template.

Respectfully submitted,



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Date: August 10, 2015

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