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March 1, 2017

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, Second Floor Harrisburg, PA 17120

RE: Inititative to Review and Revise the Existing Low-Income Usage Reduction

Program (LIURP) Regulations at 52 Pa. Code §§ 58.1-58.18

Docket No. L-2016-2557886

Dear Ms. Chiavetta:

Attached are the Reply Comments of PECO Energy Company ("PECO") in Response to Secretarial Letter, on the above captioned case, which was filed on this date.

If you have any questions regarding this filing, please contact me directly at 215.841.6863.

Very truly yours,

Ward L. Smith

Counsel for PECO Energy Company

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WS/ab

Enclosure

cc: Sarah Dewey, PUC

Louise Fink Smith, PUC

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Initiative to Review and Revise the Existing

Low-Income Usage Reduction Program (LIURP)

Regulations at 52 Pa. Code §§ 58.1 – 58.18

Docket No. L-2016-2557886

REPLY COMMENTS OF PECO ENERGY COMPANY ("PECO") IN RESPONSE TO SECRETARIAL LETTER

PECO Energy filed comments in this docket on January 30, 2017. Those comments set forth PECO's position on the issues raised by this Secretarial Letter initiative.

In addition, the Energy Association of Pennsylvania ("EAP") is filing reply comments on behalf of the utility industry. In lieu of filing its own reply comments, PECO supports the EAP reply comments.

Some stakeholders, including the EAP, have suggested that this issue is too complex to be resolved solely on the basis of written submittals and that, before the Commission proceeds to a formal rulemaking on these issues, it may wish to convene a stakeholder working group to more fully develop stakeholder positions and alternatives on issues raised by the Secretarial Letter. If the Commission chooses to form such a working group, PECO would like to participate in the working group.

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## Respectfully submitted,

Ward L. Smith

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Date: March 1, 2017