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November 19, 2019

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

Re: Answer of the Energy Association of Pennsylvania to Petition for Permission to Submit Late-Filed Comments on 2021 Total Resource Cost (TRC) Test Tentative Order, Docket M-2019-3006868

Dear Secretary Chiavetta:

On September 11, 2019, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order at the above-referenced docket proposing guidelines for the Total Resource Cost Test that will be used in planning for and implementing a potential Phase IV Act 129 Energy Efficiency and Conservation (“EE&C”) Program that, if approved, would begin on June 1, 2021. Based on the publication of the Tentative Order in the *Pennsylvania Bulletin* on October 12, 2019, comments were due on November 1 and reply comments were due on November 12. The Energy Association of Pennsylvania (“EAP”), on behalf of its electric distribution company (“EDC”) members¹ subject to the provisions of Act 129 of 2008, 66 Pa. C. S. § 2806.1 (“Act 129”), filed comments and reply comments in this proceeding. Its individual EDC members subject to the provisions of Act 129 also filed comments that both supported the comments of EAP and raised additional issues concerning the Tentative Order.

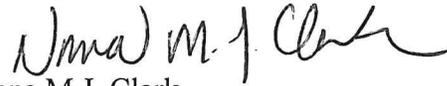
On or about November 6, 2019, a Petition for Permission to Submit Late-Filed Comments (“Petition”) on behalf of the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Philadelphia Area Industrial Energy Users Group, the PP&L Industrial Customer Alliance, the West Penn Power Industrial Intervenors and the Pennsylvania Energy Consumer Alliance (collectively “Petitioners”) was filed which included a copy of the comments

¹ EAP EDC members obligated under to Act 129 to file EE&C plans include Duquesne Light Company, Metropolitan Edison Company, PECO Energy Company, Pennsylvania Electric Company, Pennsylvania Power Company, PPL Electric Utilities Corporation and West Penn Power Company.

as Exhibit A that would be submitted if the Petition were granted by the Commission. EAP received service of the Petition on November 6, 2019 pursuant to 52 Pa. Code § 1.56 (a)(2).

Pursuant to 52 Pa. Code § 5.61 (a) and (e), EAP files this letter as an Answer to the Petition, providing that it does not object to the Petitioners' request to submit late-filed comments, stating that either EAP or its EDC members may choose to submit reply comments to Petitioners' late filed comments and further stating that any reply comments will be filed expeditiously following the formal submission of Petitioners' comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M.J. Clark". The signature is fluid and cursive, with the first name "Donna" being the most prominent.

Donna M.J. Clark

Vice President & General Counsel

Enclosure

CC: Certificate of Service
David Edinger, TUS, at dedinger@pa.gov
Louise Fink Smith, Esq., at finksmith@pa.gov

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (b)(3) (relating to service by a participant).

VIA EMAIL

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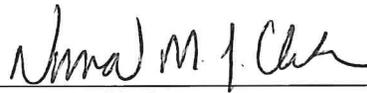
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Donna M.J. Clark

Dated this 19th day of November, 2019, at Harrisburg, Pennsylvania