



Duquesne Light
Our Energy...Your Power

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March 30, 2009

VIA OVERNIGHT MAIL

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

COPY

**Re: Implementation of the Alternative energy Portfolio Standards Act of
2004 Standards for the Participation of Demand Side Management
Resources – Technical Reference Manual
Docket No. M-0051865**

**Implementation of Energy Efficiency and Conservation Program
Docket No. M-2008-2069887**

Dear Secretary McNulty:

Enclosed for filing are the original and fifteen copies of the Reply Comments of Duquesne Light Company in the above-referenced proceedings. Please do not hesitate to contact us if you have any questions.

Sincerely yours,

Kelly L. Geer, Esq.

Enclosures

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Implementation of the Alternative	:	
Energy Portfolio Standards Act of 2004	:	Docket No. M-00051865
Standards for the Participation of Demand	:	
Side Management Resources – Technical	:	
Reference Manual	:	
Implementation of Energy Efficiency and	:	
Conservation Program	:	Docket No. M-2008-2069887
	:	

**REPLY COMMENTS OF
DUQUESNE LIGHT COMPANY**

On Proposed Update to the Technical Reference Manual

I. Introduction

On January 15, 2009, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) adopted an Implementation Order pursuant to Act 129 (“Implementation Order”), establishing standards for Energy Efficiency and Conservation (“EE&C”) plans which are to be filed on or before July 1, 2009 by Pennsylvania electric distribution companies with at least 100,000 customers.¹ Act 129 requires the PUC to establish an evaluation process whereby the Commission will monitor and verify data collection, quality assurance and the results of each EE&C plan.²

¹ Implementation Order, Docket No. M-2069887 at 1
² 66 Pa.C.S. § 2806.1(a)(2)

In the Implementation Order, the Commission determined that it would rely upon a Technical Reference Manual (“TRM”) previously adopted in the Alternative Energy Portfolio Standards Act (“AEPS”) proceedings at Docket No. M-00051865 to help meet the Act 129 evaluation process requirements.³ The Commission recognized that the existing TRM adopted in 2005 under the AEPS Act would need to be expanded and updated if it were to be useful in measuring and evaluating results under the EDC EE&C plans. Thus, on February 20, 2009, via Secretarial Letter, the Commission requested comments on a proposed update to the TRM to meet requirements under both the AEPS Act and Act 129. Duquesne Light Company (“Duquesne” or the “Company”) submitted comments on March 12, 2009.

The Commission held a TRM Working Group meeting on March 24, 2009. In adherence to the Secretarial Letter and requests of members of the Working Group, Duquesne submits the following Reply Comments.

II. Overall Themes in TRM Comments

Duquesne supports the comments provided by the Energy Association of Pennsylvania (“EAPA”) and in addition offers the following:

AEPS v. 129

Duquesne agrees with the discussion at the working group meeting on March 24, 2009 that the manual would be best applied by differentiating between the portions of the document that are applicable to the AEPS Act and those relevant to Act 129. To that end, one possible method to differentiate the applicability of the different Acts is to shade certain sections of the

³ Implementation Order, Docket No. M-2069887 at 13

document applicable to each Act. In order to provide further clarification, Duquesne agrees with the addition of a Definitions section to the TRM.

Future TRM Updates

Duquesne agrees that the TRM is a work in progress document; accordingly, an annual review process would be advantageous in order to meet the Act 129 requirements. The timeline discussed in the TRM Working Group meeting on March 24, 2009, which planned on making a finalized revision by December 31 with an effective date of June 1, 2010 is reasonable.

Net to Gross Savings

Duquesne supports the current adoption of the New Jersey application that assumes that free riders and free drivers should cancel each other out. Duquesne believes that the New Jersey position is workable and the information gathered through the implementation of the first EE&C plans will provide relevant data going forward.

III. Specific Measure Discussions

Large Scale Data Analysis

With respect to the comments filed by Positive Energy regarding the large scale data analysis, which appears overly complicated and not Pennsylvania specific, Duquesne believes that it is more related to Evaluation Measurement and Verification analysis and should not be included in this version of the TRM. However if the Commission feels it should be included in this version, further discussions are warranted by the Working Group.

In regard to Elster Integrated Solutions' comments that additions to the TRM concerning smart metering and metering data be made now, it is Duquesne's opinion that this subject belongs in a process focused on Smart Metering.

IV. Conclusion

The TRM in its revised form will be a guide for the development of EDCs EE&C plans, In the event that an EE & C Plan warrants customized measures, Duquesne understands that can and should be put forward with its programs to assist in meeting Act 129's aggressive goals.

Duquesne thanks the Commission for the opportunity to comment on this matter.



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