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VIA U.P.S. NEXT DAY

April 1, 2009

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


Re: **Energy Efficiency and Conservation
Program at Docket No. M-2008-2069887**

**Staff Proposal Concerning Template for
Pennsylvania EDC Energy Efficiency and
Conservation Plan**

Dear Secretary McNulty:

Enclosed is the original copy of the Comments filed on behalf of West Penn Power Company d/b/a Allegheny Power concerning the proposed Template for Pennsylvania EDC Energy Efficiency and Conservation Plans. This filing is also made electronically. The original copy is filed by UPS Next Day and electronically and is deemed filed today.

Very truly yours,


John L. Munsch
Attorney

JLM:sac

Enclosures

cc: RA-ACT129@state.pa.us

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Energy Efficiency and Conservation Program	:	
	:	Docket No. M-2008-2069887
	:	
Re: Staff Proposal Concerning Template for Pennsylvania EDC Energy Efficiency and Conservation Plan	:	
	:	
	:	

**COMMENTS OF
WEST PENN POWER COMPANY D/B/A ALLEGHENY POWER**

West Penn Power Company d/b/a Allegheny Power (“Allegheny Power” or “Company”) provides comments concerning the proposed “Template for Pennsylvania EDC Energy Efficiency and Conservation Plans” circulated by the staff of the Pennsylvania Public Utility Commission (“Commission”) on March 18, 2009. Allegheny Power appreciates this opportunity and provides the following comments and suggestions:

1. Allegheny Power has a general observation about customer class segmentation anticipated in the template. The Company can develop programs to target all customer classes, to track participants by customer segmentation, and to track program results. However, Allegheny Power’s ability to segment its existing customer base into the various customer classes anticipated by the template is limited by existing information in the Company’s customer information system. For example, the Company does not track government or non-profit customers separately from other small and large commercial customers. As for tracking low-income customers, the Company can only identify low-

income customers who are currently receiving benefits. Consequently, data provided in the Template's Table 6 ("% of Total Customer Revenue" column) will be estimated data.

2. With respect to customer class definitions and various utility definitions, Allegheny Power believes that the definition of small and large commercial and industrial customers will vary among EDCs because they have different customer bases and rate structures.
3. Allegheny Power suggests a clarification concerning reportable MWh savings. Specifically, should the annualized numbers be based on number of participants and deemed savings per measure, or should they be calculated based on an estimate regarding the timing of the installation relative to each program year?
4. Section 5 Reporting:
 - 5.1.1. The Statewide Plan Evaluator or the Commission is apparently responsible for the first set of items – i.e., the report to be provided to the Commission, the schedule of their delivery and the intended contents. Since reporting is not required until after the implementation, Allegheny Power recommends that responses to this section reference the Plan Evaluator recommendation to be determined 90 days after the Plan Evaluator contract is signed.
 - 5.1.2. See above 5.1.1.
 - 5.2.2. See above at 5.1.1. Allegheny Power expects to create information systems to provide the information requested. But specific details of those systems are not yet available. Moreover, specific details of EDCs' internal systems should not concern the Commission as long as EDCs meet the reporting requirements effectively.

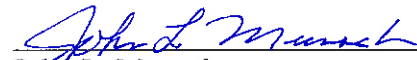
5.2.3. Allegheny suspects that it would be less costly for the Commission to build a central system and database to host EDCs' reported data and information than for each EDC to build a secure system for third party access. Allegheny Power is also concerned about providing third parties direct access to internal Company systems and databases where confidential customer data is housed, regardless of the existence of confidentiality agreement.

5. Various tables are referenced throughout the Plan Template. If the Commission intends that EDCs present this information consistently, the Commission or State Plan Evaluator should develop standard table formats. Additionally, examples of completed tables and a definition of terms would add clarity to expected data and information provided.
6. Table 2: Weather-adjusted savings may or may not be applicable to each program. Weather influences on savings should be factored into the calculation. For example, using the Energy Star calculator to determine measure savings effectively provides weather-adjusted savings based on standard heating and cooling hours in the calculator.
7. Tables 1 – 9: Examples and a definition of columns would be useful to help EDCs provide the information requested.
8. Table 5: Additional information and direction would be helpful concerning Non-Energy Metrics.
9. Table 7a. b: It would be helpful if the desired cost elements were identified.
10. Table 8a: It would be helpful if more information on desired metrics for “Non-Electric” benefit columns were provided. Winter load reduction column should be removed because it is not targeted area for reduction.

11. Table 8a: A clarification of where distribution capacity should be reflected would be helpful.

Respectfully Submitted,

Date: April 1, 2009



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