Duquesne Light
Our Energy...Your Power

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January 19, 2010

VIA OVERNIGHT MAIL

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

Re: Duquesne Light Company Energy Efficiency and Conservation Program
Docket No. M-2009-2093217

Dear Secretary McNulty:

Enclosed for filing are the original and 3 copies of the Reply Comments of Duquesne Light Company in connection with the Compliance Filing of Duquesne's modified Energy Efficiency Plan. Please do not hesitate to contact us if you have any questions.

Sincerely yours,

Gary Jack

Enclosure

cc: All parties on the Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company For Approval of its Energy Efficiency and Conservation and Demand Response Plan	: : :	Docket No. M-2009-2093217

REPLY COMMENTS OF
DUQUESNE LIGHT COMPANY

Duquesne Light Company ("Duquesne") files these Reply Comments in response to the Comments of the Office of Consumer Advocate ("OCA"), filed on January 8, 2010 in the above-referenced proceeding.

I. Background

On October 27, 2009, the Pennsylvania Public Utility Commission ("PUC" or "Commission") entered its Order approving Duquesne's Energy Efficiency and Conservation and Demand Response Plan (the "Plan") subject to certain modifications. The Commission's Order directed Duquesne to file a revised Plan consistent with the modifications within sixty days of the October 27 Order. Prior to that deadline, the Office of Small Business Advocate ("OSBA") filed a Petition for Reconsideration, which the Commission ruled on December 17, 2009. This ruling resulted in Duquesne being required to file and serve all parties of record a red-lined version of its revised Plan. Accordingly, on December 23, 2009, Duquesne filed a red-lined version of its revised Plan. The Commission issued a Secretarial Letter on December 24, 2009, changing the period for comments and reply comments to January 8, 2010 and January 19, 2010, respectively. Only the OCA filed Comments on January 8, 2010 ("OCA Comments").

II. Issues Raised by the OCA and Duquesne's Responses

A. Solar Program Removal – Figures 4 and 47 referencing the *reduction* in revised total cumulative kWh savings and the *increase* in revised total kW demand savings

The OCA asked that Duquesne explain certain "anomalies" as well as submit corrected versions of Figures 4 and 47 if they are in error. The "anomalies" referenced pertain to the difference in total cumulative kWh savings that resulted from removing the solar program from both Figures 4 and 47. OCA Comments at 2. Duquesne understands how the OCA would be confused by these numbers, and will address it herein as well as in the attached revised Figure 4 and Figure 47.

When Duquesne deleted the solar program from the Plan and added the residential furnace fans as the Commission directed, it could not just use the same exact budget dollars, i.e., do a one-for-one budget dollar exchange. Duquesne's Residential Energy Efficiency Rebate Program ("REEP") forecasts impacts that are based on the region's technical potential for efficiency gain.[1] Therefore, when Duquesne incorporated the new furnace fan program into REEP, it did so in proportion to the region's technical potential for efficiency gain. Furnace fans need more funding than was allotted to the solar program ($974,594 versus $150,000 per year.). Therefore, Duquesne reduced some of the funding from other residential programs, primarily the outdoor lighting program. Rather than allocate funding reductions in a purely

[1] Duquesne's programs are planned annually and extrapolated across Act 129 program years. Annually, based on technical potential, REEP is projected to implement 11,697 high-efficiency furnace fans. The fan measure incremental cost is estimated to be $202. Residential program incentive levels, which are based on benchmarking similar programs nationally, are set at 33% of incremental cost, or $66.00. Program administrative costs are estimated at 20% of program budgets, which is also based on the aforementioned benchmarking, amounting to $17.32 per fan. The resulting estimated program cost is $83.32 per fan. Given the program cost and number of fans, the annual program expenses for high-efficiency furnace fans is projected to be $974,594. The solar program had annual proposed costs of $150,000. Annual savings is estimated at 359 kWh per fan The savings impacts are modeled using Energy-10 residential and commercial building performance modeling software, which was developed under a partnership between the US Department of Energy and the Sustainable Building Industry Council. Program costs can be represented as $0.23 per annualized kWh.

proportional manner, which it could have done, Duquesne was responsive to the OCA's Testimony of Witness Hill, who voiced his concern regarding the amount of savings and program emphasis on residential outdoor lighting as a percent of the total residential portfolio. OCA Statement No. 1 at 13. Duquesne understood Witness Hill's concerns and realized that the projected REEP impacts may be too heavily biased toward outdoor lighting. Given the opportunity to add furnace fans to the measure mix, Duquesne believes it is important to fund the furnace fan program adequately and to utilize the majority of the funding in excess of the eliminated solar program from primarily the outdoor lighting program.[2] The levelized program cost figures for furnace fans versus outdoor lighting ("ES Outdoor Fixture") are $0.0440/kWh and $0.0126/kWh, respectively. See Figure 5 of the revised Plan, attached hereto. This resulted in the REEP budgets and total cumulative kWh savings having a larger energy reduction "anomaly" than it would have had from simply deleting the solar program.

As described in Footnote 30 on page 122 of the revised Plan, adding the furnace fans also resulted in a shift of the overall measure mix and forecast measure savings in Duquesne's penetration model. It reduced the penetration of other more cost-effective measures (primarily outdoor lighting fixtures), which caused an overall *reduction* of projected savings in the residential sector programs. This change is also referenced in the revised Figures 4 and 47, attached hereto.

Another part of the "anomalies" referenced by the OCA involved the total demand savings *increasing* as a result of removing the solar program. Again, the addition of furnace fans resulted in a shift of the overall measure mix and forecast measure savings in Duquesne's penetration model. Lower cost measures such as outdoor lighting had to be removed and

[2] All REEP programs, however, are proposed to experience some reduction in budget in order to add furnace fans.

replaced with more expensive measures (furnace fans). Demand projections based on that change resulted in demand savings *increasing* because furnace fans operate more during peak periods than outdoor lighting, which is for the most part operational during the off-peak night hours.

B. Furnace Fan Addition to REEP – Figure 5

The OCA also requested a more accurate depiction of Figure 5, given the changes to the REEP resulting from the addition of the high efficiency furnace fans. The OCA points out that Figure 5 in Duquesne's originally filed Plan compared to Figure 5 in the revised Plan reveals changes in annual program savings as well as the number of homes affected for most of the measures listed in the figure. OCA Comments at 3. OCA is correct. While the budget dollars needed for the furnace fan came primarily from the outdoor lighting program, there was a pro rata share of dollars taken from all the other REEP programs. Accordingly, Duquesne herein submits a revised Figure 5 that shows the annual program savings and number of homes affected for each measure that changed as a result of adding furnace fans to the Plan. Additionally Tablee 6 A is enclosed showing the new budget for REEP.

C. Savings Projections tied to other REEP Measures to be Discussed During the Stakeholder Process

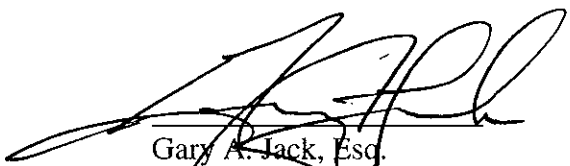
The OCA revisited its concern regarding outdoor lighting fixtures, and stated that revised Figure 5 appropriately reduces the projected savings. However, the OCA noted its interest in continuing discussions regarding REEP measures in the stakeholder process. Duquesne submits that it welcomes this opportunity and also looks forward to ongoing discussions with the OCA within the stakeholder process meeting, the first of which is anticipated to occur by the end of April 2010.

III. Conclusion

Duquesne believes that each of the revised figures as well as explanation submitted herein accounts for the OCA's concerns regarding the revised Plan. Duquesne respectfully requests the Commission to accept Duquesne's amended Plan submitted on December 23, 2009, including the revised Figures 4, 5, and 47 and REEP budget shown in Table 6 A

Respectfully Submitted,

Duquesne Light Company



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January 19, 2010

these requirements. In addition to mandated programs, a portfolio of programs was assembled to penetrate key markets. The table below shows the structure of the portfolio to meet these objectives:

Figure 4: Portfolio Objectives

Cumulative Energy (kWh) and Demand (kW) Savings		Program Years Ending		
	Program Name	May 31, 2011 (kWh)	May 31, 2013 (kWh)	May 31, 2013 (kW)
		49,102,713	113,738,471	56,044
Residential	Energy Efficiency	~~50,623,321~~	~~118,121,083~~	~~54,916~~
	Residential/Schools	2,025,000	4,725,000	4,253
	Refrigerator Recycling	5,000,503	11,667,840	2,908
	~~Solar Voltaic Incentives~~	~~312,000~~	~~624,000~~	~~240~~
	Low-Income Energy Efficiency	12,880,759	30,055,105	12,254
Commercial	Umbrella Program Rebates	8,043,808	18,768,885	4,027
	Office Buildings	46,251,895	108,521,087	22,189
	Healthcare	17,093,091	39,883,880	8,557
	Retail Stores & Restaurants	18,601,305	43,403,046	9,312
	Education	10,557,498	24,634,161	5,285
	Governmental / Non-Profit	26,920,191	62,813,778	20,187
Industrial	Industrial Rebates (umbrella)	3,772,833	8,803,277	1,360
	Primary Metals	25,708,810	59,987,224	9,265
	Chemicals	9,343,007	21,800,349	3,367
	Industrial Rebates (Mixed)	8,335,770	19,450,130	3,004
Demand Response(DR)				
	Residential DR	229,965	1,388,748	18,595
	Small/Mid Commercial DR	111,974	671,846	7,776
	Large C/I Curtailable Load	172,800	1,036,800	10,800
Total EEC & DR Programs (cumulative)		~~245,984,531~~	~~576,356,241~~	~~198,294~~
		244,151,922	571,349,629	199,182
Mandated Reductions		140,885,117	422,565,351	113,000

Projected program measure penetration for each portfolio is provided in the Study. Specifically, energy efficiency supply curves for the residential, commercial and industrial portfolios detail the amount of savings that will be achieved at each level of cost, built up across individual measures. An example of program measure content in the residential portfolio is provided below. The measure detail for the commercial and industrial is provided in the Study.

Figure 5: Residential Energy Efficiency Rebate Program

Residential Energy Efficiency Rebate Program plus Refrigerator Recycling Program

Measure Description	Levelized Cost $/kWh	Annual Program Savings kWh	Total Annual Savings kWh	Homes
Programmable Thermostat (ASHP Heating)	$0.0047	3,238,694	3,238,694	1,775
		~~3,529,380~~	~~3,529,380~~	~~1,934~~
Pipe Wrap	$0.0049	208,038	3,446,732	4,728
		~~226,710~~	~~3,756,091~~	~~5,153~~
Linear Fluorescent T5/T8	$0.0059	453,309	3,900,041	8,599
		~~493,996~~	~~4,250,086~~	~~9,371~~
Faucet Aerators	$0.0065	824,220	4,724,261	2,971
		~~898,197~~	~~5,148,283~~	~~3,237~~
Duct Repair (ASHP Heating)	$0.0070	4,986,060	9,710,321	1,306
		~~5,433,580~~	~~10,581,864~~	~~1,424~~
High Efficiency Pool Pump and Motor	$0.0102	33,112	9,743,433	24
		~~36,084~~	~~10,617,948~~	~~26~~
Low Flow Showerhead	$0.0124	333,414	10,076,847	1,755
		~~363,339~~	~~10,981,287~~	~~1,912~~
ES Outdoor Fixture	$0.0126	4,504,707	14,581,554	19,326
		~~11,736,969~~	~~22,718,256~~	~~21,061~~
Occupancy sensor based controls	$0.0135	1,326,287	15,907,841	1,973
		~~1,445,327~~	~~24,163,583~~	~~2,150~~
Solar Water Heat	$0.0161	979,854	16,887,695	402
		~~1,067,800~~	~~25,231,383~~	~~438~~
Programmable Thermostat (CAC HP Cooling)	$0.0178	954,975	17,842,670	1,974
		~~1,040,688~~	~~26,272,070~~	~~2,152~~
26-50W CFL Screw-in	$0.0183	72,058	17,914,727	548
		~~18,846~~	~~26,290,916~~	~~143~~
Refridgerator Recycling	$0.0183	3,333,669	21,248,396	3,508
		~~3,333,669~~	~~29,624,585~~	~~3,508~~
EnergyStar Fridges	$0.0185	8,253	21,256,649	96
		~~8,994~~	~~29,633,579~~	~~105~~
Ceiling Insulation R38 (ASHP Heating)	$0.0192	1,258,604	22,515,253	593
		~~1,371,569~~	~~31,005,148~~	~~646~~
Wall Insulation R19 (ASHP Heating)	$0.0197	3,439	22,518,691	1
		~~3,747~~	~~31,008,895~~	~~1~~
Whole House Fans (CAC HP Cooling)	$0.0198	995,821	23,514,513	1,145
		~~1,085,201~~	~~32,094,095~~	~~1,248~~
Ceiling Insulation R30 (ASHP Heating)	$0.0201	1,304,406	24,818,919	646
		~~1,421,482~~	~~33,515,578~~	~~704~~

Duct Insulation (ASHP Heating)	$0.0202	897,906	25,716,825	808
		~~978,496~~	~~34,494,074~~	~~881~~
18-22W CFL Screw-in	$0.0222	144,036	25,860,861	1,083
		~~37,671~~	~~34,531,746~~	~~283~~
13-17W CFL Screw-in	$0.0234	3,179,219	29,040,080	5,904
		~~831,496~~	~~35,363,242~~	~~1,544~~
23-26W CFL Screw-in	$0.0252	998,313	30,038,393	2,680
		~~261,100~~	~~35,624,342~~	~~701~~
ES Indoor Fixture	$0.0281	94,472	30,132,865	1,192
		~~24,708~~	~~35,649,050~~	~~312~~
EnergyStar Freezers	$0.0314	1,309	30,134,174	23
		~~1,427~~	~~35,650,477~~	~~25~~
EnergyStar Room Air Conditioners	$0.0336	1,515	30,135,689	22
		~~1,651~~	~~35,652,127~~	~~24~~
EnergyStar Dehumidifiers	$0.0383	1,365	30,137,054	6
		~~1,488~~	~~35,653,615~~	~~6~~
Cooling Equipment (CAC - SEER 15)	$0.0391	355	30,137,409	3
		~~387~~	~~35,654,002~~	~~3~~
Duct Repair (CAC HP Cooling)	$0.0395	5,188	30,142,597	12
		~~5,654~~	~~35,659,656~~	~~14~~
ES Torchieres	$0.0416	1,305,546	31,448,143	12,434
		~~1,422,724~~	~~37,082,380~~	~~13,550~~
High Efficiency Fan - Heating	$0.0440	4,202,756	35,650,898	11,697
26-50W CFL Hard-Wire	$0.0542	649	35,651,548	44
		~~170~~	~~37,082,550~~	~~12~~

Figure 47: Cumulative Portfolio and Program Reductions in Consumption[30]

Cumulative Energy (kWh) and Demand (kW) Savings		Program Years Ending		
	Program Name	May 31, 2011 (kWh)	May 31, 2013 (kWh)	May 31, 2013 (kW)
		49,102,713	113,738,471	56,044
Residential	Energy Efficiency	~~50,623,321~~	~~118,121,083~~	~~54,916~~
	Residential/Schools	2,025,000	4,725,000	4,253
	Refrigerator Recycling	5,000,503	11,667,840	2,908
	~~Solar Voltaic Incentives~~	~~312,000~~	~~624,000~~	~~240~~
	Low-Income Energy Efficiency	12,880,759	30,055,105	12,254
Commercial	Umbrella Program Rebates	8,043,808	18,768,885	4,027
	Office Buildings	46,251,895	108,521,087	22,189
	Healthcare	17,093,091	39,883,880	8,557
	Retail Stores & Restaurants	18,601,305	43,403,046	9,312
	Education	10,557,498	24,634,161	5,285
	Governmental / Non-Profit	26,920,191	62,813,778	20,187
Industrial	Industrial Rebates (umbrella)	3,772,833	8,803,277	1,360
	Primary Metals	25,708,810	59,987,224	9,265
	Chemicals	9,343,007	21,800,349	3,367
	Industrial Rebates (Mixed)	8,335,770	19,450,130	3,004
Demand Response(DR)				
	Residential DR	229,965	1,388,748	18,595
	Small/Mid Commercial DR	111,974	671,846	7,776
	Large C/I Curtailable Load	172,800	1,036,800	10,800
Total EEC & DR Programs (cumulative)		~~245,984,531~~	~~576,356,241~~	~~198,294~~
		244,151,922	571,349,629	199,182
Mandated Reductions		140,885,117	422,565,351	113,000

9.1.3. Provide statement delineating the manner in which the EE&C plan will achieve the Low-Income requirements under 66 Pa. C.S. §§ 2806.1(b)(1)(i)(G).

Act 129 requires low income customer segment program energy savings to be a proportional share of mandated reductions equivalent to the low income segment energy use percentage of Duquesne Light's total territory energy use. As described in Section 3.2.1 LIEEP description, the low income segment's proportional share of Duquesne's total territory energy use is estimated to be approximately 6.1%. As shown above in Section 9.1.2 and the table below, LIEEP projected energy savings exceeds these target savings amounts.

[30] REEP energy savings and demand reduction estimates changed based on increasing annual budgets $150,000 (previously in Solar PV) and addition of the high-efficiency furnace fan measure. Adding furnace fans shifted the overall measure mix and forecast measure savings in Duquesne's penetration model. This reduced the penetration of other more cost-effective measures (primarily outdoor lighting fixtures) resulting in an overall reduction of projected savings in the Residential sector programs.

Table 6A: Portfolio-Specific Assignment of EE&C Costs [1]

Table 6A: Portfolio-Specific Assignment of EE&C Costs [1]

Residential Portfolio

EE&C Program [2]	Cost Elements ($) [3]						Totals
	Portfolio	*Program*	*Incentives*				
Residential Energy Efficiency	~~$297,808~~ $369,808	~~$2,680,268~~ $2,788,268	~~$10,423,264~~ $10,903,264				~~$13,401,339~~ $14,061,339
Residential: Schools Energy Pledge	$137,067	$1,233,600	$630,000				$2,000,667
Refrigerator Recycling	$41,811	$376,300	$1,463,391				$1,881,502
Low Income Energy Efficiency	$123,800	$970,499	$3,830,048				$4,924,348
~~*Solar Voltaic Incentives*~~	~~$0~~	~~$0~~	~~$600,000~~				~~$600,000~~
Demand Response: Residential A/C Cycling	$193,352	$1,740,172	$994,546				$2,928,070
Totals	~~$793,838~~ $805,838	~~$7,000,839~~ $7,108,839	~~$17,941,249~~ $17,821,249				$25,735,926

* Program Administration cost inlcudes marketing and outreach costs.

nall Commercial/Industrial Portfolio

EE&C Program [2]	Cost Elements ($) [3]						Totals
	Portfolio Administration	*Program Administration**	*Incentives*				
Commercial Umbrella (Small)	$13,432	$120,886	$470,114				$604,432
Office Buildings (Small)	$88,525	$796,726	$2,968,880				$3,854,131
Retail Segments (Small)	$31,061	$279,550	$1,087,138				$1,397,749
Education (Small)	$17,629	$158,663	$617,024				$793,317
Industrial Umbrella (Small)	$18,158	$163,422	$163,320				$344,900
Industrial Mixed (Small)	$136,836	$1,231,524	$1,230,759				$2,599,119
Demand Response: Small & Mid-Sized C/I	$68,116	$613,044	$311,040				$992,200
Totals	$373,757	$3,363,815	$6,848,275				$10,585,848

Table 6A: Portfolio-Specific Assignment of EE&C Costs [1]

Large Commercial/Industrial Portfolio							
EE&C Program [2]	**Cost Elements ($) [3]**						**Totals**
	Portfolio Administration	*Program Administration**	*Incentives*				
Commercial Umbrella (Large)	$32,381	$291,431	$1,133,344				$1,457,156
Office Buildings (Large)	$174,900	$1,574,100	$6,251,000				$8,000,000
Healthcare (Large)	$97,353	$876,175	$3,407,347				$4,380,875
Retail Segments (Large)	$74,882	$673,935	$2,620,857				$3,369,674
Education (Large)	$42,500	$382,503	$1,487,514				$1,912,517
Industrial Umbrella (Large)	$43,775	$393,975	$393,731				$831,481
Primary Metals (Large)	$422,023	$3,798,211	$3,795,853				$8,016,088
Chemicals (Large)	$153,370	$1,380,333	$1,379,476				$2,913,179
Demand Response: Curtailable Load for Large C/I	$27,672	$249,048	$279,936				$556,656
Totals	$1,068,857	$9,619,711	$20,749,057				$31,437,626

Public Agency Portfolio							
EE&C Program [2]	**Cost Elements ($) [3]**						**Totals**
	Portfolio Administration	*Program Administration**	*Incentives*				
Public Agency (Large)	$231,653	$2,084,881	$8,107,871				$10,424,406
Totals	$231,653	$2,084,881	$8,107,871				$10,424,406

Totals	~~$2,468,106~~ $2,480,106	~~$22,069,247~~ $22,177,247	~~$53,646,453~~ $53,526,453				$78,183,806

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Reply Comments of Duquesne Light have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

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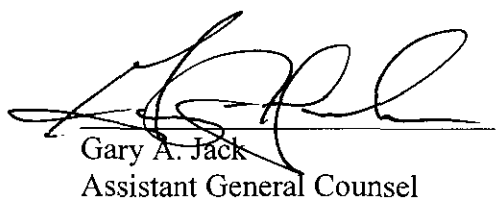

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