

PENNSYLVANIA UTILITY LAW PROJECT

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October 18, 2010

Via E-Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg , PA 17105-3265

Re: Petition of West Penn Power Company d/b/a Allegheny Power for Approval of its Energy Efficiency and Conservation Plan, Approval of Recovery of its Costs through a Reconcilable Adjustment Clause and Approval of Matters Relating to the Energy Efficiency and Conservation Plan

Docket No. M-2009-2093218

Dear Secretary Chiavetta:

Please accept for re-filing in the above captioned proceeding the following Comments of the Pennsylvania Communities Organizing for Change ("PCOC"). This re-filing is intended to correct an e-filing rejection associated with an e-filing of PCOC Comments made on October 15, 2010. This re-filing is made pursuant to instructions received from the Pennsylvania Public Utility Commission's Secretary's Bureau in an e-mail dated October 18, 2010.

All parties to this proceeding received notice of these Comments during the original filing. Notice was made by first class and electronic mail.

Thank you for your assistance, and please feel free to contact me directly should you have any questions.

Very truly yours,



Julie George, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of West Penn Power Company :
d/b/a/ Allegheny Power for Approval of : **Docket No. M-2009-2093218**
Amended Energy Efficiency and :
Conservation Plan :

COMMENTS OF PENNSYLVANIA COMMUNITIES
ORGANIZING FOR CHANGE (“PCOC”)

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Dated: October 15, 2010

INTRODUCTION

This proceeding concerns amendments proposed by West Penn Power Company d/b/a/ Allegheny Power (“Allegheny” or “company”) to its Act 129 Energy Efficiency and Conservation (“EE&C”) plan pursuant to the requirements of Act 129 of 2008, P.L. 1492 (“Act 129”), 66 Pa.C.S. §§2806.1-2806.2.

These comments are submitted by Pennsylvania Communities Organizing for Change (“PCOC”) as an interested stakeholder pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) invitation for interested parties to comment upon each electric distribution company’s (“EDCs”) revised EE&C plans.¹ PCOC’s interest in this proceeding derives from the impact the proposed amendments will have upon low-income customers residing in Allegheny’s service territory.

Pennsylvania Communities Organizing for Change is comprised of low and moderate income Pennsylvanians working to build power through organizing communities to win changes on the issues that are important to them. PCOC thanks the Commission for this opportunity to provide these comments.

¹ See Secretarial Letter Re:Proposals to Change Energy Efficiency and Conservation Plans Approved by the Commission Pursuant to Act 129 of 2008, Docket Nos. M-2009-2093217, M-2009-2092222, M-2009-2112952, M-2009-2112956, M-2009-2093215, M-2009-2093216, and M-2009-2093218, Sept. 1, 2010; Implementation Order Re: Energy Efficiency and Conservation Program, Docket No. M-2008-2069887, (Order entered Jan. 16, 2009), at 24.

COMMENTS

(1) Multi-family Properties:

PCOC strongly encourages the company to include within its revised EE&C plan specific measures targeted to multi-family properties providing affordable housing to low-income families. As it currently reads, Allegheny's revised EE&C plan makes no explicit commitment to target multi-family affordable housing. PCOC recommends that, prior to Commission approval of the revised EE&C plan, Allegheny include a specific commitment to target conservation services to multi-family properties providing affordable housing to low-income families.

Targeting multi-family affordable housing provides an opportunity for Allegheny to accrue significant energy savings from a single project, while helping preserve affordable housing for low-income families. Multi-family affordable housing projects also provide an opportunity to leverage Act 129 funds with other available federal weatherization funding, thereby increasing the impact of the project and meeting Act 129's mandate to coordinate its low-income Act 129 activities with other programs administered by the Commission or another federal or state agency.² Because multi-family affordable housing projects provide these benefits, they should be an important component of Allegheny's revised EE&C plan.

Targeting multi-family affordable housing provides an opportunity for the company to achieve significant energy savings from a single project, which have many dwelling units at a single, concentrated site. A conservation service provider can reach many dwelling units in a single visit. Also, in addition to working on individual units, a conservation provider would have the opportunity to address large-scale, building wide heating and cooling systems, roofs, and the

² 66 Pa.C.S. § 2806.1(b)(1)(G).

like. Because these sites offer so many rich opportunities for accruing sizeable energy savings, they make perfect sense as projects for the company to target.

When Act 129 funds are used for multi-family affordable housing properties, there is a ready source of additional funding that can be used to increase the impact and affordability of the project: the Department of Energy's Weatherization Assistance Project ("WAP"), which now includes a specific set of funding targeted to the weatherization of multi-family housing. The funds are being administered by the Pennsylvania Housing Finance Authority ("PHFA") through their Preservation Through Smart Rehab program. This pool of funding is approximately \$22 million, and it can and should be wed with Act 129 funds to improve the scale and effectiveness of these weatherization projects. PHFA has been working with several collaborative groups of property owners to compile a list of properties for treatment.³ So the EDC will not even have to search for participants; there is already a pool of properties ready to move and an excellent financial incentive to do so.

Because of these many benefits, PCOC recommends that, prior to Commission approval of the revised EE&C plan, Allegheny include a specific commitment to target conservation services to multi-family properties providing affordable housing to low-income families.

(2) Elimination of the Low Income Room Air Conditioner Replacement Program

Allegheny proposes to eliminate its stand alone Low Income Room Air Conditioner Replacement Program because air conditioner replacement is a function already included within the company's existing Low Income Home Performance Check Up with Appliance Replacement

³ There currently are three collaborative groups working with PHFA: the Energy Conservation Collaborative in western Pennsylvania, the Central Pennsylvania Conservation Collaborative, and the Philadelphia Weatherization and Conservation Collaborative.

Program and is therefore duplicative as a stand alone program.⁴ PCOC supports the elimination of duplicative program elements where such an elimination does not reduce the level of services provided to low income households. Since it appears from the company's Petition and Revised Plan that the elimination of its Low Income Room Air Conditioner Replacement Program is intended not to reduce services to low income household but to eliminate a programmatic duplication, PCOC supports this revision.

(3) Operation of Residential Joint Utility Usage Management Program – Low Income Weatherization Program (“JUMP”)

On September 15, 2010, Allegheny Power files with the Commission its annual Act 129 EE&C Plan Annual Report. According to the Annual Report, Allegheny's JUMP has not enrolled any customers and has not accrued any energy savings.⁵ Allegheny did not address in its Petition or in its revised EE&C Plan why there has been no activity for the JUMP. Since this program is projected to accrue a sizeable portion of the low-income sector's energy savings, it seems reasonable for the company to provide a description of its plans for beginning enrollment into this program during the upcoming program year.

PCOC recommends that, prior to Commission approval of the revised EE&C plan, Allegheny provide a clear description of its plans for beginning enrollment into the JUMP during the upcoming program year.

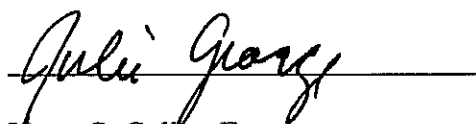
⁴ Petition of West Penn Power Company d/b/a/ Allegheny Power for Approval of Amended Energy Efficiency and Conservation Plan, Docket No. M-2009-2093218, (Filed on September 10, 2010) at 3; Allegheny Power Revised EE&C Plan at 12.

⁵ Allegheny Power Act 129 EE&C Plan Annual Report for June 1, 2009 – May 31, 2010, Filed September 15, 2010, at 23.

CONCLUSION

In conclusion, PCOC thanks the Commission for the opportunity to submit these comments and encourages the Commission to continue its efforts to ensure low-income families receive satisfactory levels of service through the Act 129 EE&C plans.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Julie George", is written over a horizontal line.

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