

PENNSYLVANIA UTILITY LAW PROJECT

**118 LOCUST STREET
HARRISBURG, PA 17101-1414**

**JULIE GEORGE, ESQ.
JGEORGEPULP@PALEGALAID.NET**

**PHONE: (717) 236-9486, EXT. 214
FAX: (717) 233-4088**

October 18, 2010

Via E-Filing

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

Re: Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation and Demand Response Plan, Approval of its Recovery of its Costs through a Reconcilable Adjustment Clause and Approval of Matters Relating to the Energy Efficiency and Conservation Plan

Docket No. M-2009-2093217

Dear Secretary Chiavetta:

Please accept for re-filing in the above captioned proceeding the following Comments of Pennsylvania Communities Organizing for Change ("PCOC"). This re-filing is intended to correct an e-filing rejection associated with an e-filing of the 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 Duquesne Light Company : Docket No. M-2009-2093217
for Approval of its Energy Efficiency :
and Conservation and Demand :
Response Plan :

COMMENTS OF PENNSYLVANIA COMMUNITIES
ORGANIZING FOR CHANGE ("PCOC")

Harry S. Geller, Esq.
Julie George, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088
pulp@palegalaid.net

Dated: October 15, 2010

INTRODUCTION

This proceeding concerns amendments proposed by Duquesne Light Company (“Duquesne” 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 plan.¹ PCOC’s interest in this proceeding derives from the impact the proposed amendments will have upon low-income customers residing in Duquesne’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.

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. Targeting multi-family affordable housing provides an opportunity for the company to

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.

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 both 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 the 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 has many dwelling units at a single, concentrated site. A conservation service provider can reach many dwelling units in a single visit to a multi-family housing project site. 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 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, a ready source of additional funding 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 its 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

² 66 Pa.C.S. § 2806.1(b)(1)(G).

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 of weatherizing affordable multi-family housing, PCOC strongly encourages Duquesne to specifically target resources for pursuing these projects as part of its revised EE&C plan.

(2) Refrigerator/Freezer Replacement

On September 15, 2010, Duquesne Light Company filed with the Commission its annual Act 129 EE&C Plan Annual Report. Duquesne has added a Refrigerator/Freezer Replacement measure to its Low Income Energy Efficiency Program. This program will allow low-income customers to swap out old and inefficient refrigerators or freezers for newer, energy efficient models. These replacements are provided at no cost to low-income customers. PCOC supports the inclusion of the Refrigerator/Freezer Replacement program as an additional measure to the Low Income Energy Efficiency Program.

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.

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, reading "Julie George", is written over a horizontal line.

Harry S. Geller, Esq.
Julie George, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088
pulp@palegalaid.net

Dated: October 15, 2010

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Approval of its Energy Efficiency :
and Conservation and Demand :
Response Plan, Approval of its :
Recovery of its Costs through a : **Docket No. M-2009-2093217**
Reconcilable Adjustment Clause and :
Approval of Matters Relating to the :
Energy Efficiency and Conservation :
Plan :

VERIFICATION

I, Craig Robbins, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

10/14/10

Signature:



Craig Robbins
Executive Director
Action United
846 North Broad Street - 2nd Floor
Philadelphia, PA 19130