

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: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans

Docket Nos. M-2009-2092222, M-2009-2112952, & M-2009-2112956

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 these 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**

Joint Petition for Consolidation of	:	Docket No. M-2009-209222
Proceedings and Approval of Energy	:	M-2009-2112952
Efficiency and Conservation Plans of	:	M-2009-2112956
Metropolitan Edison Company,	:	
Pennsylvania Electric Company and	:	
Pennsylvania Power Company	:	

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

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Dated: October 15, 2010

INTRODUCTION

This proceeding concerns amendments proposed by Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (“the Companies”) 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 the Companies’ 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 implement the specific measures targeted to multi-family properties detailed in its revised EE&C plan. The Companies missed out on the substantial benefits of this program by failing to implement it in year one. Targeting multi-

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.

family affordable housing provides an opportunity for the company 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 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 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

² 66 Pa.C.S. § 2806.1(b)(1)(G).

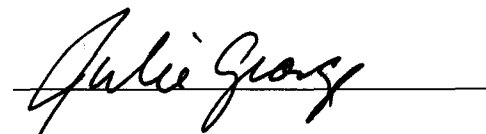
weatherization projects. PHFA has been working with several collaborative groups of property owners to compile a list of properties for treatment.³ So the EDC will not even have to search for participants; there is already a pool of properties ready to move and an excellent financial incentive to do so.

Because of these many benefits of weatherizing affordable multi-family housing, PCOC strongly encourages the Companies to specifically target resources for pursuing these projects as soon as possible as part of its revised EE&C plan.

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,



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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.