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November 1, 2010

VIA E-FILE AND FIRST CLASS MAIL
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street – 2nd Floor
Commonwealth Keystone Building
Harrisburg, Pennsylvania 17120

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:

Attached are the Reply Comments of West Penn Company, d/b/a Allegheny Power submitted in the above-referenced proceeding. Copies are being served as indicated in the attached Certificate of Service.

Very truly yours,

John F. Povilaitis

JFP/ck
Enclosures

c. Certificate of Service
The Honorable Katrina L. Dunderdale

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of West Penn Power Company d/b/a/ Allegheny Power for Approval of its Energy Efficiency and Conservation Plan, Approval of Recovery of Costs through a Reconcilable Adjustment Clause and Approval of Matters Relating to the Energy Efficiency and Conservation Plan	:	Docket No. M-2009-2093218

REPLIES OF WEST PENN POWER COMPANY D/B/A ALLEGHENY POWER

West Penn Power Company d/b/a Allegheny Power ("Allegheny Power" or "Company" submits its replies to the answers or comments received in response to its amended Energy Efficiency and Conservation and Demand Response Plan ("EE&C/DR Plan") filed September 10, 2010. Allegheny Power submits herein its replies, beginning on pages as shown, to the following parties or entities that filed answers or comments concerning the Company's Amended EE&C/DR Plan:

Page 2: Reply to Office of Small Business Advocate ("OSBA");

Page 5: Reply to West Penn Power Industrial Intervenors ("WPPII");

Page 15: Reply to The Pennsylvania State University ("Penn State");

Page 15: Reply to Pennsylvania Communities Organizing for Change ("PCOC").

The Company submits its replies pursuant to the Secretarial Letter of the Commission dated June 24, 2010, in which the Commission provided guidance for interested parties to file recommendations and objections to revised EE&C plans, and for the EDCs to submit replies to interested parties' recommendations and objections.

Allegheny Power Reply to OSBA

In its submission, and in the memorandum of its witness Bob Knecht attached to OSBA Answer, OSBA makes several recommendations and observations.

OSBA requests that the Company explain the increase in administrative costs in the Amended EE&C/DR Plan as compared to the original EE&C/DR Plan. As part of the development of the Amended EE&C/DR Plan, the Company completed a comprehensive evaluation of all plan costs in order to develop a plan that meets all requirements of Act 129 including the two percent budget cap. As a result of this review the Company updated the administration costs in the Amended EE&C/DR Plan as follows:

- Program start-up costs increased by $2.5 million based on actual costs through the 2009 Plan Year. Of this amount, $1.3 million was due to alignment of internal administration with timing of program implementation and $1.2 million was due to timing of program development activities in relation to the Plan approval process.
- Ongoing program administration costs for 2010 through 2012 Plan Years increased by $1.0 million based on the Amended EE&C/DR Plan programs and current operations.
- Information technology ("IT") costs increased by $1.8 million based on updated projections for IT requirements of the Amended EE&C/DR Plan providing for additional program management and tracking and reporting functionality over what was included in the original plan.

The increase in the Company's administration costs including Program start-up and Information Technology costs as detailed above results in an increase in Plan costs in the 2009 Plan Year.

In response to OSBA's request that the Company explain tracking of program costs, the Company responds that it uses to track all plan, program and measure costs. The Company has specific accounting that it uses to assign all costs to the Plan, Program or Measures.

In response to OSBA's request that the Company explain its perceived shift in expenditures, the Company refers to its response to WPPII, beginning at page 7 herein, that details specific program changes which result in the cost shift from residential programs to commercial and industrial customers.

OSBA requests that the Company explain changes in Heating, Ventilating, and Air Conditioning ("HVAC") Efficiency Program. The Company is replacing the incentive for the installation of new energy efficient HVAC units with an incentive for the maintenance of existing HVAC units. The change provides an incentive for maintenance activities and it provides the opportunity for more customers to participate due to the much lower cost of performing maintenance as opposed to the much higher cost of new installations. The high cost of new installations is a barrier to customer participation. Furthermore, maintenance activities of HVAC units provide for energy and demand savings opportunities for all customers with applicable HVAC equipment as opposed to new installations which primarily only occur at or near the end of the life of the existing units. Replacing HVAC equipment with higher efficiency models is certainly an initiative that should be considered in future plan or program revisions as additional experience warrants. While the proposed program has a Total Resource Cost ("TRC") benefit-to-cost ratio less than 1.0, the Company's Amended EE&C/DR Plan has an overall Total Resource Cost ("TRC") benefit-to-cost ratio greater than 1.0. HVAC maintenance is included in the approved EE&C/DR plans of other EDCs and HVAC installations are one of the major equipment or processes for small commercial and industrial customers that this program targets.

Without this program the Company would not have a program that improves the efficiency of HVAC equipment for customers.

OSBA also requests clarity about incentive payments for new measures including Commercial Smart Strips and Commercial Compact Fluorescent Lights ("CFLs"). The Company benchmarked other EDCs in determining the incentive level for the Commercial Smart Strips and CFL measures added to the Company's Commercial Lighting/Products Efficiency Program. The Company's Amended EE&C/DR Plan is based on a customer incentive of $0.04/kWh saved for commercial CFL installations, and $10 per smart strip installation.

OSBA also requests that the Company map program costs to rate class groups. Section 7.0 of the Company's Amended EE&C/DR Plan provides the mapping and explanation of the allocation of program costs to rate schedules. In addition, work papers are provided at the end of the Amended EE&C/DR Plan which detail the program allocations and cost recovery by rate schedule.

OSBA asks that the Company explain how it will get higher participation from commercial and industrial ("C&I") customers and whether or not the Amended EE&C Plan mis-assigns cost to C&I rather than government/non-profit customers. The Custom Technology Applications program was expanded to target any additional customer participation and is not exclusive to government customers. Program costs for the Custom Technology Applications program are allocated to Schedules 30 small and 30 large, which is inclusive of commercial, government and industrial customers.

OSBA asks that the Company explain why time of use ("TOU") critical peak pricing appears to be less cost effective in the Amended Plan. The Company updated its modeling of the TOU with Critical Peak Pricing rate offering and the following items contribute to a reduction in the cost effectiveness of the program from a TRC of 2.5 in the approved EE&C/DR Plan to a TRC of 1.1 in the Amended EE&C/DR Plan:

- The budget of the program increased by $380,149 due primarily to an increase in customer incentives as well as the increase in administration costs due to updated costs discussed earlier and allocation of plan costs over a smaller program portfolio.
- Reduced energy and demand savings due to smaller customer participation and non-operation of the program during the 2010 Plan Year.
- Decreased avoided electricity cost benefits from what was used in the approved Plan.

Allegheny Power Response to WPPII

WPPII asks why the Company removed the Variable Frequency Drives Program from its Plan while expanding the Custom Technology Applications and Custom Applications Programs and, also, why there was not an increase in upfront incentives.

The Company implemented the Custom Applications and Custom Technology Applications Programs in March 2010 and has received substantial interest in the programs. To date the Company has pre-approved 34 applications for these programs that are in various stages of completion, with several more that have been submitted and are waiting for qualification. Based on the significant interest to date, the Company proposed to expand these programs to permit additional customers to participate in and benefit from these programs and for additional customer projects to be completed.

The previous Custom Applications Program budget anticipated 21 customer projects to be completed over the 2010 though 2012 Program Years whereas the proposed program projects 28 customer projects to be completed in this same timeframe.

The previous Custom Technology Applications Program budget anticipated 57 customer projects to be completed over the 2010 though 2012 Program Years whereas the proposed program projects 89 customer projects to be completed in this same timeframe.

The overall program budgets have increased to reflect the additional customer projects to be completed and the budgets have been updated to reflect the updated administration costs discuss earlier. Specifically, with respect to individual budgets:

- The administration budgets have increased as a result of handling additional customer projects and reallocation of costs across a reduced program portfolio.
- The marketing budgets have increased as a result of targeting additional customer projects.
- The outside services budgets have decreased due to the engineering services required to evaluate projects (based on the actual cost of completed project evaluations to date) being less than originally projected.
- The evaluation budgets have increased due to additional customer projects at a higher cost than originally projected, based on current measurements and verification requirements associated with custom projects.
- The incentives budgets have increased due to additional customer projects being completed under the programs.

While the Company understands the concerns of WPPII that the Company did not propose an increase in the amount of the customer incentives provided on a per project basis under these programs, the current applications received do not indicate that the current incentive structure is insufficient to cause customers to pursue participation in these programs. However, the Company will monitor this concern and may propose a change in the incentive structures (percentage of project and/or project cap eligible per project) if a change is determined to be needed to support the additional customer participation that is proposed under the programs.

Regarding the Variable Frequency Drives Program, the Company notes that the Amended Plan does not remove the eligibility of this measure from the Company's Plan. Rather, the Amended Plan consolidates this measure into either the Custom Applications or Custom Technology Applications Programs, which also supports the proposed expansion of these programs. The Company had two primary reasons for the consolidation. First, development of measurement and verification plans for the installation of variable frequency drives primarily requires custom measurement and verification protocols that are typical for custom projects. As such, the Company plans to leverage the processes it has developed for the custom programs to evaluate the installation of efficient variable frequency drives. Second, the installation of efficient variable frequency drives is sometimes included as part of a larger customer project that is better suited to be handled through the custom programs as opposed to handling portions of the customer project within respective programs. For these reasons the Company proposes to handle the installation of efficient variable frequency drives through the Custom Applications or Custom Technology Applications Programs.

WPPII questions the cost shift in the Amended Plan from residential to commercial and industrial customers. WPPII notes that the Company shifted approximately $8.1 million from the residential class to the small and large commercial and industrial rate classes. Comparing Table 5 of the Company's approved and amended EE&C/DR Plans shows the following cost changes:

Customer Class	Plan Budget April 29, 2010	Plan Budget September 10, 2010	Difference
Residential	$40,354,300	$34,122,362	-$6,231,938
Residential Low Income	$13,536,344	$12,224,921	-$1,311,423
Residential Subtotal	**$53,890,644**	**$46,347,283**	**-$7,543,361**
C&I Small	$19,420,835	$25,670,590	$6,249,755
C&I Large	$15,352,608	$17,170,814	$1,818,206
Government	$5,572,427	$5,061,304	-$511,123
Non-Residential Subtotal	**$40,345,870**	**$47,902,708**	**$7,556,838**
Total	**$94,236,514**	**$94,249,991**	**$13,477**

The Company emphasizes that the Amended Plan does not shift an undue burden of the its total EE&C/DR Plan budget to non-residential customers. The Company submits that the shift actually restores equilibrium to the Company's EE&C/DR Plan. As illustrated in the above table, the Amended Plan achieves near equilibrium in the costs allocated on a percentage basis between residential and non-residential customers.

The Amended EE&C/DR Plan was developed based on experience gained since the Company developed the original EE&C Plan in mid-2009. Recent experience with EE&C/DR programs indicates that several programs for C&I customers are exceeding expectations for customer interest or have the opportunity to be expanded to incorporate additional measures and, therefore, may provide greater opportunity for achieving additional energy/demand reduction results. Accordingly, regardless of any change to the pace of the Company's smart meter deployment discussed later, the Company would be proposing to make expanded EE&C/DR programs available to C&I customers, and the costs associated with those programs would be attributable to C&I customers. The Company has emphasized the need to revise its EE&C/DR Plan based on experience in every EE&C/DR Plan filing.

The Company notes pages 44 to 45 of the its April 29, 2010, EE&C/DR Plan filing where the Company recognized that it would make further changes in its EE&C/DR Plan. It stated: "The Company proposes to continue to revise the Plan, based on the experience gained from offering programs to our PA customers, in an effort to maximize Plan effectiveness in meeting the targets and requirements of Act 129." The Company must revise the EE&C/DR Plan in order to meet the goals and requirements of Act 129 and that the experience in Pennsylvania as well as the continual development of the Technical Reference Manual supports the revisions proposed in the Amended EE&C/DR Plan. The Amended EE&C/DR Plan includes the following program changes:

Residential Programs

1. Home Performance Program: The Company is consolidating the "Check Up" and "Comprehensive" audit measures included in the Home Performance Program into a single "In Home" audit measure to simplify program design and administration. This, in conjunction with a revised estimate of program participation based on feedback from program management, results in a decreased program budget. The overall budget for this program decreased by $4,839,818.
2. Low Income Room Air Conditioner Replacement Program: The Company is removing the program as a stand-alone program and instead is providing for the replacement of room air conditioners through the Company's Low Income Home Performance Check Up with Appliance Replacement Program. Room Air Conditioner Replacement is already included in the Company's Low Income Home Performance Check Up with Appliance Replacement Program and the removal of this stand alone program removes duplicity of this measure in the Company's EE&C/DR Plan. The removal of this program results in a budget savings of $1,792,221.

3. Residential (HVAC/Whole Home Appliance) Efficiency Program: The Company is replacing the incentive for the installation of new energy efficient HVAC units with an incentive for the maintenance of existing HVAC units. HVAC maintenance is included in the approved EE&C/DR plans of other EDCs and, further, the Technical Reference Manual provides for energy and demand savings for maintenance activities of residential HVAC units. The change to providing an incentive for maintenance activities provides the opportunity for more customers to participate due to the much lower cost of performing maintenance as opposed to the higher cost of new installations. The Company is also adding a new measure to the Residential (HVAC/Whole Home Appliance) Efficiency Program. The change is based on the development of Interim Deemed Savings for new Energy Star Domestic Water Heating types and provides the opportunity for more customers to participate in the program and supports the opportunity for additional energy and demand savings not already included in the Company's EE&C/DR Plan. The overall budget for this program decreased by $357,999.

Non-Residential Programs:

4. Commercial and Industrial Drives Program: The Company is removing this program and instead providing for the installation of energy efficient drives through the Company's custom programs. The Company plans to provide for Commercial and Industrial Drives through the existing Custom Technology Applications and Custom Applications Programs due to the requirement for custom measurement and verification protocols. Handling energy efficient drives and custom measurement and verification protocols

through the custom programs leverages existing processes and streamlines program administration. The removal of this program results in budget savings of $3,182,185.

5. Commercial HVAC Efficiency Programs: The Company is replacing the incentive for the installation of new energy efficient HVAC units with an incentive for the maintenance of existing HVAC units. The change to providing an incentive for maintenance activities provides the opportunity for more customers to participate due to the much lower cost of performing maintenance as opposed to the higher cost of new installations. The overall budget for this program decreased by $36,801.
6. Commercial (Lighting/Products) Efficiency Program: The Company is revising its Commercial (Lighting/Products) Efficiency Program to expand the eligible lighting measures by using the June 2010 Technical Reference Manual update. In addition, the Company is adding Smart Strips to the program based on the development of Interim Deemed Savings for Smart Strips. This provides the opportunity for more customers to participate in the program and supports the opportunity for additional energy and demand savings not already included in the Company's EE&C/DR Plan due to the addition of different lighting types and sizes that are contained in Appendix C of the Technical Reference Manual and Smart Strips. The overall budget for this program increased by $2,835,957.
7. Custom Technology Applications Program: The Company is expanding the Custom Technology Applications Program to provide the opportunity for more customer projects to be completed. This is based on program implementation and management to date which supports the opportunity for additional customer projects to be completed than

originally projected. This results in an increased program budget. The overall budget for this program increased by $3,147,724.

8. Custom Applications Program: Similar to the expansion of the Custom Technology Applications Program, the Company is expanding the Custom Applications Program to provide the opportunity for more customer projects to be completed. This is based on program implementation and management to date which supports the opportunity for additional customer projects to be completed than originally projected. The overall budget for this program increased by $4,500,260.

A change in the focus of EE&C/DR program availability to C&I customers is not an unfair "shifting" of costs to those customers, but a restoration of balance between residential and C&I focused programs compared to the current Plan, as discussed above.

As WPPII recognized in its comments, the Commission has expressed concern about the Company's reliance on the rapid deployment of smart meters and, as result, the Commission encouraged the Company to develop and submit an alternative Act 129 Plan with less reliance on smart meters. The Amended EE&C/DR Plan constitutes the plan recommended by the Commission. The slower deployment of smart meters requires revision of the Company's current approved EE&C/DR Plan because nine of the currently-approved Allegheny Power EE&C/DR programs assume the widespread availability of smart meters. In the Amended EE&C/DR Plan, the Company is proposing a new mix of programs available to customers, with only four of the programs relying on a much smaller deployment of smart meters.

In regard to any perceived "cost shifting" from the related changes to the Company's EE&C/DR Plan necessitated by the proposed decelerated smart meter deployment schedule, the current EE&C/DR Plan assumed large numbers of residential customer smart meters would be deployed by mid-2012 to enable a portfolio of residential smart meter related EE&C/DR programs. Under the Amended EE&C/DR Plan, equilibrium in the availability of programs is restored; simply, expanded programs and additional measures are directed toward C&I customers, as compared to the current approved EE&C/DR Plan. Appropriately, to the extent that expanded programs under the Amended EE&C/DR Plan are targeted to provide C&I customers with increased opportunities for energy savings, C&I customers will be assessed the associated costs, in the same manner in which residential customers must bear the cost of programs that are intended to accrue to the benefit of residential customers. This shifting does not discriminate against C&I customers. C&I customers will not pay for programs that benefit other classes, but only for the programs from which they might in fact derive benefit. The Amended EE&C/DR Plan matches programs, their benefits and the costs of those programs to the customers that enjoy the availability of the programs.

As illustrated by the following chart, the proportion of the EE&C/DR Plan budget that is allocated to C&I customers under the Company's Amended EE&C/DR Plan continues to compare favorably to those customers' proportionate shares of the budgets associated with EE&C/DR plans proposed by and/or approved for other EDCs. In fact, the chart demonstrates that three other EDCs' EE&C/DR plans have a higher allocation of their total budget to non-residential customers than does Allegheny Power's proposed Amended EE&C/DR Plan. For these reasons, the Company believes its C&I customers receive a fair and appropriate allocation of costs under Allegheny Power's Amended EE&C/DR Plan.

PA Act 129 Utility Program Budget Comparison

Customer Sector	Allegheny Power[1]		Allegheny Power[2]		First Energy[3, 4, 5]		Duquesne Light[6]		PECO[7]		PPL[8]	
	Total Budget	% of Total	Total Budget	% of Total	Total Budget	% of Total	Total Budget	% of Total	Total Budget	% of Total	Total Budget	% of Total
Reidential (Including Low-Income)	$53,890,644	57%	$46,347,284	49%	$125,533,478	65%	$25,735,926	33%	$152,927,888	45%	$132,382,453	30%
Non-Residential Total	$40,345,872	43%	$47,902,708	51%	$68,970,434	35%	$52,447,880	67%	$188,652,737	55%	$314,768,410	70%
Program Total	$94,236,516	100%	$94,249,992	100%	$194,503,912	100%	$78,183,806	100%	$341,580,625	100%	$447,150,863	100%

Notes
1 Allegheny Power's April 29, 2010 Act 129 EE&C/DR Plan Filing (Table 6C, p 258)
2 Allegheny Power's September 10, 2010 Act 129 EE&C/DR Plan Filing (Table 6C p 255)
3 Met Ed's December 2, 2009 Act 129 EE&C/DR Plan Filing (Table 6C Appendix G, p 10)
4 Penelec's December 2, 2009 Act 129 EE&C/DR Plan Filing (Table 6C, Appendix G p 10)
5 Penn Power's December 2, 2009 Act 129 EE&C/DR Plan Filing (Table 6C, Appendix G, p 10)
6 Duquesne Light's September 15, 2010 Act 129 EE&C/DR Plan Filing (Table 6C p 169)
7 PECO's July 1, 2009 Act 129 EE&C/DR Plan Filing (Table 6C Appendices A-E) Includes common costs not assigned to specific customer classes
8 PPL's July 31, 2009 Act 129 EE&C/DR Plan Filing (Table 6C, p 207)

The Company made additional changes to the Amended EE&C/DR Plan including the update of all plan or program costs (administration, marketing, outside services, and measurement and verification) based on actual costs, revised participation levels, or costs associated with the program changes. The cost changes can be summarized as follows:

- Administration costs increased by $5,326,154 due to updated or additional Plan/Program development, administration and implementation activities and IT requirements. See the Company's response to OSBA herein for a detailed breakdown of this cost increase.
- Marketing costs decreased by $665,150 primarily due to a reduction in programs.
- Outside Services costs increased by $450,618 due primarily to additional rebate processing associated with the revised program portfolio and participation levels.
- Measurement and Verification costs decreased by $589,891 primarily due to a reduction in programs.

Allegheny Power Response to Penn State

Penn State requests an explanation for the expansion of the Custom Application Program in the Amended EE&C/DR Plan. The Company refers Penn State to the Company's explanation of the expanded Custom Application Program in the Company's response to WPPII, at pages 5-7 herein.

Allegheny Power Response to PCOC

In general, PCOC want the company to provide programs that emphasize multi-family properties. Allegheny Power appreciates the comments by PCOC regarding providing specific measures to multi-family properties housing low-income families. The Company's Low Income Home Performance Check-Up Audit and Appliance Replacement Program is designed to include eligibility of multi-family properties. The Company plans to continue targeted outreach activities for these properties and families to encourage their participation in the program. More specifically, the Company has pursued working with HUD and other low income housing management to reach multi-family customers and have seen a positive response with 1,595 customers who have participated to date in the Low Income Home Check-Up Audit with Appliance Replacement Program, with approximately 95% of these customers resided in multi-family properties.

Furthermore, the Company is a proponent of leveraging multiple funding sources, such as Act 129 program funding and federal weatherization funding, to provide maximum benefits and services to our low income customers. The Company's Joint Utility Usage Management Program is designed to be provided in coordination with services provided under alternate funding and the Company has been working with its implementation contractors to pursue and leverage all available funding sources to provide coordinated services to its low income customers. The Company estimates that approximately 40% of the cost of projects completed to date under this program was covered by alternative funding sources.

PCOC also requests an explanation for the fact that there has been no participation in the Company's Joint Utility Usage Management Program for low income customers. The Company responds that the Joint Utility Usage Management Program was designed as a partnership with gas companies, Columbia Gas initially, to jointly coordinate, promote and provide comprehensive weatherization services to low income customers who are common to both Allegheny Power and the gas company. During the 2009 Plan Year, Allegheny Power met with Columbia Gas to coordinate providing program services and to evaluate the program to ensure that processes established are effective and efficient. Since program implementation earlier this year, 26 customers have participated in the program and the Company is looking forward to continued growth in this program. The Company currently plans to begin targeted outreach to both Allegheny Power and Columbia Gas customers beginning November 2010 to increase participation and meetings are scheduled with two other gas utility companies in the Allegheny Power service territory to continue to expand this program availability to our low income customers. The Company remains committed to meeting its low-income program goals.

Respectfully submitted,

Date: November 1, 2010

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

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