

PENNSYLVANIA UTILITY LAW PROJECT

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August 30, 2012

Via E-Filing

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

Energy Efficiency and Conservation Program
Petition of PPL Electric Utilities Corporation for Reconsideration

Docket No.
M-2012-2289411
M-2008-2069887

Dear Secretary Chiavetta:

Please find the Response of CAUSE-PA to the Petition of PPL Electric Corporation for Reconsideration in the above captioned proceeding. A copy has been served upon the Parties as indicated in the enclosed Certificate of Service.

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

Very truly yours,



Pennsylvania Utility Law Project
Harry S. Geller
Counsel for CAUSE-PA.

cc: Certificate of Service
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and Conservation Program
Petition of PPL Electric Utilities Corporation for Reconsideration

Docket No.
M-2012-2289411
M-2008-2069887

**Response of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania to the Petition for Reconsideration filed by
PPL Electric Utilities Corporation**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), through its counsel at the Pennsylvania Utility Law Project, hereby files this Response to the Petition for Reconsideration filed by PPL Electric Utilities Corporation in the above captioned proceeding and states as follows:

1. Act 129 of 2008 ("Act 129") charged the Pennsylvania Public Utility Commission ("Commission") with the task of developing an energy efficiency and conservation program ("EE&C Program.") The Act also established energy efficiency ("EE") and peak demand reduction ("PDR") targets that each electric distribution company ("EDC") with at least 100,000 customers had to meet by May 31, 2011 and/or May 31, 2013.

2. Pursuant to Section 2806.1(C)(3) of Act 129, the Commission was also charged with evaluating the costs and benefits of the EE&C Program by November 30, 2013 and every five years thereafter.

3. To help fulfill this statutory obligation, the Commission adopted a tentative order in the above captioned proceeding on May 10, 2012, outlining its proposed standards for a Phase II EE&C Program which is currently scheduled to begin June 1, 2013.

4. On August 3, 2012, after receiving comments and reply comments from the Companies and other interested parties, the Commission entered its Implementation Order ("August 3 IO").

5. In the August 3 IO, the Commission tentatively adopted specific EDC consumption reduction targets which would become final for any covered EDC that did not petition the Commission for an evidentiary hearing by August 20, 2012.

6. The August 3 IO further indicated that if an electric distribution company filed a petition for an evidentiary hearing the matter will be referred to the Office of Administrative Law Judge for hearings with the record being certified to the Commission by November 2, 2012; and that any party seeking to intervene in any such proceeding must file a Petition for Intervention with 10 days of an electric distribution company's filing a petition for an evidentiary hearing.

7. On August 20, 2012, PPL Electric Utilities Corporation ("PPL Electric" or the "Company") filed a Petition for an Evidentiary Hearing regarding the energy efficiency targets established in the August 3 IO.

8. Furthermore, on August 20, 2012 PPL filed a Petition for Reconsideration of the August 3 IO.

9. Specifically, in its Petition for Reconsideration PPL requests that the Commission clarify that its approval of the 25% adjustment factor and potential acceptance of the Phase II compliance target will not:

- a. preclude EDCs from challenging future modification to the Technical Reference Manual (TRM) or

- b. prohibit an EDC from petitioning the Commission to modify the applicable Phase II consumption reduction targets based on any TRM modifications or other future changes that are not presently known.

10. CAUSE-PA is a statewide unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families access and maintain affordable utility services and achieve economic independence and family well-being.

11. CAUSE-PA supports the creation and development of effective energy conservation and energy efficiency programs targeted to assist low-income Pennsylvanians. These programs are an essential component for obtaining and maintaining long term electricity affordability as well as the continued fostering of a household's health and welfare.

12. Because the successful implementation of Phase II of Act 129 is a matter of importance to low-income households, CAUSE-PA, through its attorneys at the Pennsylvania Utility Law Project,¹ has commented upon and actively participated as a stakeholder in meetings convened by the Commission and individual Electric Distribution Companies ("EDC"s) regarding Act 129.

¹The Pennsylvania Utility Law Project ("PULP"), is a specialized project of the non-profit Pennsylvania Legal Aid Network. PULP provides statewide representation, advice, and support in energy and utility matters on behalf of low-income, residential utility customers and low-income advocacy organizations such as CAUSE-PA.

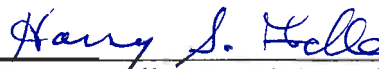
13. CAUSE-PA has interests in effects which the proposed energy efficiency requirements that are designated in the August 3 IO will have on its members, moderate- and low-income residential customers. At least one current member of CAUSE-PA is a customer of the Company and will be directly affected by the outcome of this Petition for Reconsideration.²

14. While CAUSE-PA agrees that it is reasonable for PPL and other EDCs to have the ability to challenge future TRM changes; it respectfully submits that any changes that may be made to the TRM or for future unknown circumstances not affect the Commission's designated Phase II reduction targets. As was the case in Phase I, changes in the use or application of treatments or measures made by an EDC as a result of TRM modifications, should not affect the energy savings targets which have been established by the Commission.

THEREFORE, CAUSE-PA respectfully requests that the Commission not .permit PPL or any EDC to modify its energy savings targets as requested.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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August 30, 2012

² The member of CAUSE-PA who is a customer of PPL is Lorrie Koons.

Certificate of Service

I hereby certify that I have this day served copies of the Response of CAUSE-PA, upon the parties designated below **VIA E-MAIL & FIRST-CLASS MAIL** in the captioned matter in accordance with the requirements of 52 Pa. Code § 1.54:

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August 30, 2012


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