COMMONWEALTH OF PENNSYLVANIA

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December 21, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan
Docket No. M-2012-2334388

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Sincerely,

Amy Hirakis

Amy E. Hirakis
Assistant Consumer Advocate
PA Attorney I.D. # 310094

Enclosures
cc: Hon. Dennis J. Buckley, ALJ
Certificate of Service
163284

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities For Approval of an Act 129 Phase II Energy Efficiency and Conservation Plan	: : :	Docket No. M-2012-2334388

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

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Dated: December 21, 2012

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I. INTRODUCTION

The Office of Consumer Advocate (OCA) is filing these Comments in accordance with the Notice in the *Pennsylvania Bulletin* published December 1, 2012. 42 Pa.B. 7371. These Comments are in response to the Petition of PPL Electric Utilities Corporation for Approval of an Energy Efficiency and Conservation Plan (EE&C) Plan. On December 28, 2012, in accordance with the procedural schedule adopted in this proceeding, the OCA intends to serve the written testimony of its witness Geoffrey Crandall[1] on Administrative Law Judge Dennis J. Buckley and the parties to the evidentiary portion of this proceeding. Hearings are scheduled for January 16, 2013, during which this testimony will be moved into the evidentiary record. The OCA requests that these Comments be read and considered in conjunction with the testimony of Mr. Crandall.

A. Background

On November 14, 2008, Act 129 of 2008 (Act 129) became effective. Act 129 contained a requirement for the Pennsylvania Public Utility Commission (Commission) to implement an Energy Efficiency and Conservation Program for Electric Distribution Companies (EDCs) with more than 100,000 customers. See 66 Pa.C.S. § 2806.1, *et seq*. The seven largest EDCs—PECO Energy Company (PECO), PPL Electric Utilities, Inc. (PPL), the FirstEnergy

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[1] Mr. Crandall is a principal and Vice President of MSB Energy Associates of Middleton, WI. Mr. Crandall specializes in residential and low-income issues and the impact of energy efficiency and utility restructuring on customers. He has over 35 years of experience in utility regulatory issues, including energy efficiency, conservation and load management resources program design and implementation, resource planning, restructuring, mergers, fuel, purchase power, gas cost recovery, planning analysis and related issues. His experience includes over 15 years of service on the Staff of Michigan Public Service Commission as an analyst in the Electric Division (Rates and Tariffs), as the Technical Assistant to the Chief of Staff, Supervisor of the Energy Conservation Section and as the Division Director of the Industrial, Commercial and Institutional Division, with the responsibility for the energy efficiency and conservation program design, funding and implementation of Department of Energy and utility-funded programs and initiations throughout Michigan. Mr. Crandall has provided expert testimony before more than a dozen public utility regulatory bodies throughout the United States, including this Commission, and before the United States Congress on several occasions.

Companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company), and Duquesne Light Company filed their Phase I EE&C Plans in the summer of 2009. These Phase I Plans expire on May 31, 2013.

On August 3, 2012, the Commission entered its Phase II Implementation Order, adopting EDC-specific targets for reducing energy consumption for the next EE&C Program term (June 1, 2013 - May 31, 2016). Energy Efficiency and Conservation Program, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order entered August 3, 2012) (Phase II Implementation Order). As part of that Order, each EDC was given an EDC-specific Phase II consumption reduction target. PPL's Phase II target was set at 2.1% of its expected sales for the June 1, 2009 through May 31, 2010 period.[2] Phase II Implementation Order at 24. The Commission also directed that: (1) 10% of overall consumption reductions come from the Government/ Institutional/ Non-Profit sector; (2) a plan's portfolio of measures include a proportionate number of low-income measures, and (3) EDCs obtain a minimum of 4.5% of their consumption reductions from the low-income sector. Id. at 45-57. As in Phase I, the total resource cost (TRC) test will continue to be used to evaluate each EDC's Plan. Id. at 78-83.

Act 129 caps annual spending on the Plan at 2% of the EDC's total revenues for calendar year 2006. 66 Pa.C.S. § 2806.1(g); see generally, Phase II Implementation Order at 100-119. The Act provides for full and current recovery of the Plan costs through an automatic adjustment rider, but prohibits the recovery of lost revenues by the EDC. 66 Pa.C.S. § 2806.1(b)(1)(H). The costs incurred are to be allocated to the classes that directly benefit from the measures implemented, unless a system-wide benefit can be shown.

[2] As was its right under the Phase II Implementation Order, PPL filed a Petition for Evidentiary Hearing regarding the Company's Phase II consumption reduction targets. *See* Docket No. P-2012-2320369. Direct and rebuttal testimony, evidentiary hearings, and briefing occurred and the record was certified to the Commission on November 1, 2012.

The Phase II Implementation Order also details the Plan approval process. According to the Order, the EDCs were to file their proposed Plans and the Commission was to publish those Plans in the *Pennsylvania Bulletin.* The Plans were published in the *Pennsylvania Bulletin* on December 1, 2012. 42 Pa.B. 7371.[3] The notice required these Comments to be filed within 20 days of publication. The Plans have been referred to the Office of Administrative Law Judge (ALJ) and hearings are to be completed no later than the 65th day after the Plan is filed. The Commission is to approve or reject all or part of the Plan at a public meeting within 120 days of the filing. Phase II Implementation Order at 61-62. PPL's Plan was filed on November 15th and the Commission Order is due in this matter by March 14, 2013. On December 10th, ALJ Dennis J. Buckley held a prehearing conference during which a procedural schedule was established, calling for the service of direct testimony by non-company parties on December 28, 2012, service of rebuttal testimony on January 11th, and an evidentiary hearing on January 16, 2013.

The OCA provides the following Comments on PPL's Plan in accordance with the Commission's Phase II Implementation Order.

B. The Stakeholder Process

Building upon its stakeholder process, PPL held several meetings with stakeholders (all of which the OCA attended) regarding the winding down of Phase I and its proposals for Phase II. The OCA found the PPL stakeholder process to be well attended by a diverse group of stakeholders and collaborative in nature. In the OCA's view, the stakeholder process encouraged a two-way dialogue and allowed for a better informed process for both the

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[3] Due to Hurricane Sandy, the Commission issued a Secretarial Letter extending the Plan submission filing date to November 15, 2012 and the Commission Order date to March 15, 2012. PPL filed its Plan on November 15th

participants and the Company. The OCA recommends that the Commission direct PPL to continue a robust stakeholder process during Phase II.

C. Legal Standards

A number of standards are considered by the Commission in determining whether the EDC's EE&C Plan should be approved. 66 Pa.C.S. § 2806.1(a). Most of these standards deal with the evaluation and modification of the Plan and were previously implemented as part of Phase I. See 66 Pa.C.S. §§ 2806.1(a)(2) (monitoring and verifying data collection), 2806.1(a)(4) (evaluating how Plans will meet or achieve consumption reduction goals), 2806.1(a)(6) (amending and modifying Plans), 2806.1(a)(7). Other, more general standards, must also be achieved as part of each EDC's Plan. For example, Act 129 states that each Plan must include a variety of energy efficiency and conservation measures and that such measures must be provided equitably to all classes of customers. 66 Pa.C.S. § 2806.1(a)(5). Further, cost recovery must be structured in such a manner to ensure that approved measures are financed by the same customer class that will receive the direct benefits of those measures. Id. at § 2806.1(a)(11).

Act 129 also specifically requires each EDC to demonstrate, *inter alia*, that its Plan is both cost effective using the TRC test and provides a diverse cross section of alternatives for customers of all rate classes. See 66 Pa.C.S. § 2806.1(b)(1)(i)(I). In the Act, a TRC test is defined as:

> [A] standard test that is met if, over the effective life of each plan not to exceed 15 years, the net present value of the avoided monetary cost of supplying electricity is greater than the net present value of the monetary cost of energy efficiency conservation measures.

66 Pa.C.S. § 2806.1(m). The TRC will continue to be used to evaluate each EDC's Phase II Plan. Phase II Implementation Order at 78-81. The revised TRC test for the Phase II Plans was

adopted by the Commission at its August 30, 2013 Public Meeting. 2012 PA Total Resource Cost (TRC) Test, Docket No. M-2012-2300653 (Order entered August 30, 2012).

Finally, as was discussed above, in its Phase II Implementation Order, the Commission directed that each Company's Plan be developed to include a series of specific carve-outs. The carve-outs are as follows: (1) 10% of overall consumption reductions must come from the Government/ Institutional/ Non-Profit sector; (2) a Plan's portfolio of measures must include a proportionate number of low-income measures, and (3) EDCs must obtain a minimum of 4.5% of their consumption reductions from the low-income sector. Phase II Implementation Order at 45-57.

The OCA submits that, in addition to reviewing the Company's proposed Plan for its potential to achieve the 2.1% consumption reduction target, PPL's Plan must also be reviewed to ensure that it is designed to meet all of aforementioned goals and targets in a cost-effective manner.

D. Summary of PPL's Plan

On November 15, 2012, in compliance with the requirements of Act 129 and the Commission's Phase II Implementation Order, PPL filed its Petition and EE&C Plan with the Commission. The Phase II Plan is designed to reduce total energy consumption between June 1, 2013 and May 31, 2016 by 2.1% of PPL's sales for the June 1, 2009 through May 31, 2010 period. Petition at 3-4. To achieve this goal, the Company proposes a Plan consisting of thirteen energy efficiency programs, seven of which are components of its Phase I Plan and six of which are new programs. Petition at 9-10. Specifically, the Company has proposed to continue the following programs: (1) Appliance Recycling, (2) Residential Retail Program, (3) Residential Energy-Efficiency Behavior and Education, (4) Low-income WRAP Program, (5) E-Power Wise

Program, (6) Prescriptive Equipment Small C&I, Large C&I and GNI Program, and (7) Custom Incentive Small C&I, Large C&I and GNI. Id. The Company proposes the following new programs: (1) Residential Home Comfort Program, (2) Student and Parent Energy-Efficiency Education Program, (3) Low-income Energy-Efficiency Behavior and Education Program, (4) Master Metered Low-income Multifamily Housing Program, (4) Continuous Energy Improvement Program and (5) School Benchmarking Program. Id.

PPL's portfolio of programs is designed to provide customer benefits, while also meeting the energy saving goals set forth in the Act within the designated expenditure cap of two percent (2%) of 2006 annual revenues, which is approximately $61.5 million for each year of the three-year plan. The total program spending cap is $184.5 million. Plan at 171. PPL anticipates a total cost of $186.7 million, which includes $2.2 million for Statewide Evaluator costs not subject to the cost cap.[4] Plan at 177, Table X. These costs are broken down by class as follows: Residential (including low-income) - $76.5 million; Small Commercial and Industrial (SC&I) - $43.3 million; Large Commercial and Industrial (LC&I) - $38.2 million; and Governmental, Educational/Non-Profit - $28.7 million. Plan at 176.

PPL intends to recover its costs through an Act 129 Compliance Rider that will be imposed under Section 1307 and will be both reconcilable and non-bypassable. PPL Plan 178-180. A separate recovery charge will be established for each customer class, corresponding to the costs of the programs that target that class, and will include the costs of the EE&C Plan and the Statewide Evaluator (SWE). Plan at 178. For residential customers, the recovery charge will be a levelized cents per kWh component added to the distribution charge. Id. For small commercial and industrial customers, the recovery charge will be a levelized cents per kWh

[4] PPL's Statewide Evaluator costs are approximately $3 million. A portion of this cost is included in the $184.5 million spending cap. The remaining Statewide Evaluator costs of $2.2 million were added to the spending cap to bring the Plan's total cost to $186.7 million. See Plan at 177, Table X, 178.

charge that will be a separate line item on the customer's bill. Id. For large commercial and industrial customers, the recovery charge will be a levelized dollar per kW charge that will be a separate line item on the customer's bill, where the demand kW is the customer's PJM Interconnection, LLC Peak Load Contribution. Id.[5]

PPL proposes to annually reconcile the revenues recovered from each class with the adjusted budget amounts of that class. Plan at 178. PPL also proposes to make "mid-course" corrections to its cost recovery mechanism to reflect major changes to any of its EE&C programs. Plan at 179. At the end of the three-year plan, PPL will reconcile total revenues collected to its total actual costs for the three-year Plan. Plan at 179. Phase II costs will be tracked and reconciled separately from Phase I costs and revenues. Id.

II. PRELIMINARY COMMENTS ON THE PLAN AND PROGRAMS

A. Introduction

PPL's proposed Phase II EE&C Plan contains 13 energy savings programs. Petition at 9. Each customer class has a mix of programs in which the customers can participate. The OCA will examine whether PPL's proposed Plan and programs are reasonable, well-balanced, and comply with the requirements of Act 129 and the Phase II Implementation Order. The OCA highlights some of the key residential programs below.

B. Phase II Residential Customer Programs

Of the 18 programs included in PPL's EE&C Plan, the following six programs are offered to residential customers: (1) Appliance recycling, (2) Residential Retail, (3) Residential Home Comfort, (4) Residential Energy-Efficiency Behavior & Education, (5) Prescriptive Equipment Incentive, and (6) Student and Parent Efficiency Education. See Plan at 23, Table 4.

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[5] The OCA has requested the proposed rates for each class from the company; however, the Company's response was not received in time to be included in these comments.

The Plan also includes the following three (3) residential low income programs: (1) Low-Income WRAP, (2) Low-Income Energy Efficiency Behavior and Education, and (3) E-Power-wise Program. Plan at 24, Table 4. Low-income customers may participate in both the residential programs and the low-income programs. Plan at 68.

The OCA will review these programs for potential issues including, but not limited to: (1) whether the appropriate appliances and technologies have been included in the programs; (2) whether the proposed incentive rebate levels are reasonable and appropriate; (3) whether the proposed measures are reasonably calculated to achieve the proposed savings levels; (4) whether the proposed measures are cost-effective, and (5) whether the proposed savings can be maintained over a period of time.

C. Special Plan Requirements

1. Low Income Program Requirements

In its Phase II Implementation Order, the Commission required that EDCs' Phase II Plans, *inter alia*, contain a proportionate number of low income measures and that EDCs obtain a minimum of 4.5% of their consumption reduction from the low income sector. Phase II Implementation Order at 45-57. For PPL, a 4.5% reduction in energy consumption equates to 36,948 MWh. See Plan at 192. According to PPL's Plan, the Company anticipates an 8.68% reduction from its low-income sector, which is an energy savings of 71,283 MWh and exceeds the low-income target by 93%. Id. However, PPL's three low income programs are estimated to only achieve energy savings of 22,091 MWh from its low income programs, which is a 2.62% reduction. Id. The Company will achieve the additional 49,192 MWh in energy savings from low income customers participating in the other non-low income residential programs. Id.

The OCA will review whether the Company has implemented sufficient programs for its low income customers. The OCA will also review whether the proposed low income expenditures and savings are consistent with the Phase II Implementation Order consumption reduction targets; whether the low income programs are reasonably designed to be cost-effective and to meet the consumption reduction targets; and whether additional opportunities for coordination and best practices exist to improve upon the Company's proposed low income programs. The OCA will also examine the Company's proposal to count the low income savings achieved from the participation of the low income customer population in other non-low income residential programs towards the 4.5% low income consumption reduction target and whether that proposal is reasonably designed to measure actual low income customer involvement in non-low income residential programs.

2. Government/Non-profit/School

Act 129 requires that EDCs obtain at least 10% of their consumption reduction from the government/non-profit sector. See 66 Pa.C.S. § 2806.1(b)(1)(i)(B). For PPL, this requirement equates to a reduction of 82,107 MWh. See Plan at 193. PPL's Plan is designed to exceed the statutory target by achieving a reduction of 92,835 MWh from its government/non-profit sector. See Plan at 193. The OCA will examine the Company's Plan to determine whether it meets the specific requirements of Section 2806.1(b)(1)(i)(B) and the Phase II Implementation Order.

3. Mastered Multi-metered Housing

In the Phase II Implementation Order, the Commission encouraged the EDCs to provide special emphasis and consideration for energy savings from multifamily master metered housing within the government/nonprofit sector. See Phase II Implementation Order at 49-50.

The Commission did not propose specific funding or savings targets for multifamily master metered housing. However, the Commission encouraged the EDCs to develop strategies and programs within their Phase II EE&C plans targeted at multifamily housing to address energy savings opportunities. Id.

In response, the Company developed the Master Metered Low-Income Multifamily Housing Program. The Master Metered Low-Income Multifamily Housing Program provides customers with energy audits and rebates for installing energy-efficient measures within non-profit multi-family master metered buildings. Plan at 138. The Company collaborated with the Pennsylvania Housing Finance Agency (PHFA) and local housing authorities to evaluate the multifamily housing market within its service territory to estimate level of participation. Plan at 143. The Company anticipates a total of 88 walkthrough audits and approximately 130,000 energy-efficiency measures are anticipated to be installed, replaced and recycled. Id. The company expects this program to achieve an estimated energy savings of 6,000-10,000 MWh. Plan at 144. The OCA commends PPL for rising to the Commission's challenge to address energy savings in the multifamily housing market. The OCA will examine the proposed design of the multi-family program and whether the costs of the multifamily, master metered program have been appropriately allocated.

D. Cost Recovery

Pursuant to Act 129 and the Phase II Implementation Order, PPL's total budget for its Phase II Plan is limited to 2% of the Company's total annual revenue as of December 31, 2006. See 66 Pa. C.S. § 2806.1(g); Phase II Implementation Order at 101-102. Each EDC must provide a careful estimate of the costs of its Phase II Plan including capital expenditures and administrative costs. Phase II Implementation Order at 102. Additionally, Section 2806.1(a)(11) of Act 129 requires that program costs must be paid for by the customer class receiving the energy savings benefits of the program. See 66 Pa. C.S. § 2806.1(a)(11). PPL proposes to collect allowable costs of its Phase II Plan through an Act 129 Compliance Rider (ACR). See Plan at App. G. PPL calculated its annual Phase II budget at approximately $186,727,658. Plan at 17, Table 3. The Company proposed to apportion approximately 41% of the Phase II budget to residential and low-income programs. Plan at 17, Table 3. PPL's Phase II Plan summary of costs for the customer classes is as follows:

Customer Class	Total Phase II Budget	Budget Percent
Residential	$58,124,768	31.13%
Low-Income	$18,416,829	9.86%
SC&I	$43,291,666	23.18%
LC&I	$38,184,198	20.45%
Government/Non-profit	$28,710,196	15.38%

Source: Plan at 17, Table 3.

PPL's budget for its Phase II Plan appears to exceed its 2% spending cap, which for PPL is $184.5 million, by approximately $2.2 million. Plan at 21. According to the Plan, this $2.2 million excess comprises the estimated costs for the Statewide Evaluator, which is not subject to the 2% spending cap. Id. The OCA will review the Company's proposed costs included within the ACR to ensure that those costs are permissible to be recovered under Act 129 and the Phase II Implementation Order.

The Phase II Implementation Order requires that Phase II EE&C measures be financed by the customer class that receives the direct benefit from the programs. Phase II Implementation Order at 110. In compliance with this directive, PPL calculated the EE&C costs for each of the customer classes separately. Plan at 21. However, for common costs, such as costs that are applicable to multiple classes or provide system-wide benefits, PPL assigned costs to the separate customer classes using an allocation factor equal to the percentage of the EE&C costs directly assigned to each customer class to the total EE&C costs directly assigned to all customer classes. Plan at 179-180.

The OCA does have concern about potential subsidies between rate classes. Specifically, all of the costs of the Residential Appliance Recycling Program and Residential Retail Program are allocated to the residential class. However, these programs are available to all classes and the Plan anticipates that commercial customers will participate to some degree in the programs. Plan at 34, 40. The OCA will examine the Company's proposed cost allocation of all programs to determine whether the costs are appropriately allocated to the customer classes which will benefit from the programs.

The Company's budgeted costs vary year to year. Plan at 22. PPL proposes to levelize the costs over the three-year plan period. Id. The Plan also proposes an annual reconciliation of the revenues collected through the ACR with the adjusted budget amounts for each class. Id. The Plan also proposes "mid-course" corrections in the ACR to reflect major changes in any of the EE&C programs. Id. At the end of the three year program, the Company will reconcile total revenue collected to its actual expenses. Plan at 179. The Company will use this final reconciliation process to determine whether it needs to refund over-collections or recover additional monies for under-collections existing at the end of the three year plan. Id.

The OCA supports the Company's plan to levelize costs, particularly for residential customers, to avoid any undue volatility and confusion in rates. The OCA also supports the Company's proposal to make "mid-course" corrections to reflect major changes to any of its EE&C programs so that large changes in cost recovery or programs are not required at the end of the plan.

V. CONCLUSION

The OCA appreciates this opportunity to provide Comments on this important topic. The OCA will also provide the testimony of its expert witness in accordance with the schedule established by ALJ Buckley. The OCA will seek to ensure that PPL's Phase II Plan is designed to meet the requirements of the Act and that it does so in a cost-effective and balanced manner.

Respectfully Submitted,

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Dated: December 21, 2012
163275

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation	:	
For Approval of its Act 129 Phase II	:	Docket No. M-2012-2334388
Energy Efficiency and Conservation Plan	:	

I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of December 2012.

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