



March 19, 2014

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

**Re: Petition of PECO Energy Company for Approval of its Action 129
Phase II Energy Efficiency and Conservation Plan
Docket No. M-2012-2333992**

Dear Secretary Chiavetta:

On February 28, 2014, PECO Energy Company (PECO or the Company) filed a Petition for Approval of Amendments to its Act 129 Phase II Energy Efficiency and Conservation Plan (EE&C Plan). The Company requested that an expedited Comment and Reply Comment period be established in order to ensure that the changes proposed could be implemented in time for the upcoming summer months. On March 7, 2014, the Commission issued a Secretarial Letter approving an expedited Comment and Reply Comment period.

On behalf of its clients the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), the Pennsylvania Utility Law Project hereby submits this letter in lieu of formal comments in the captioned proceeding.

In its Petition, the Company proposed certain changes to the Low-Income Energy-Efficiency Program which were designed to increase customer participation in both Refrigerator Recycling and Replacement programs and increase CFL use through additional community events. Petition at 6. These changes would significantly increase the demand savings and benefits for low-income customers without an increase in the budget allocated to the low-income program as a whole. CAUSE-PA supports this change.

The Company's Petition also has proposed amendments that include the continuation of its Mass Market Direct Load Control Program for residential and small commercial customers through the remainder of the Phase II Plan period. Petition at 7-8. CAUSE-PA supports this change.

Overall, the Company's Petition would result in a spending reduction of approximately \$1 million, but would generate significant increased savings for both low-income and other customers. CAUSE-PA supports these prudent modifications and requests that the Commission approve the Petition expeditiously so as to allow the Company to begin prompt implementation.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT

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CC: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :
for Approval of its Act 129 Phase II :
Energy Efficiency and Conservation Plan : **Docket No. M-2012-2333992**

Certificate of Service

I hereby certify that I have this day served copies of the foregoing Letter in Lieu of Comments on the parties of record in the captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54:

VIA E-MAIL and UNITED STATES FIRST CLASS MAIL

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