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March 19, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Petition of PECO Energy Company for Approval of its Act 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 "Company") filed a Petition for Approval of Amendments to its Act 129 Phase II Energy Efficiency and Conservation Plan ("EE&C") Plan with the Pennsylvania Public Utility Commission ("PUC" or "Commission"). Consistent with the schedule set forth in the March 7, 2014, Secretarial Letter, the Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby submits this letter in lieu of formal comments to PECO's Petition.

Among other modifications, the Petition proposed "Adjustments to incentive levels in light of Phase II Plan experience to date, within the same rebate range originally approved by the Commission... ." Petition, p. 7. Upon review of the clean and redlined EE&C Plan changes attached as Exhibits B and C to the Petition, PAIEUG observed numerous Large C&I program measures with adjusted rebate ranges of "\$0 to \$0," which would be outside the ranges originally approved by the Commission. PAIEUG contacted PECO to discuss the apparent discrepancy between the Petition and the attached EE&C Plan. During these discussions, PECO confirmed that the zeroed out rebates were the result of a technical error. PECO further affirmed that it would correct the rebate ranges through Reply Comments and that such corrections would not modify the budget or energy savings calculations set forth in the Petition.

Subject to PECO correcting the zeroed out refunds to preserve previously approved rebate ranges for existing EE&C Plan measures, PAIEUG does not oppose the Petition.

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Secretary Chiavetta

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As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare

Counsel to the Philadelphia Area Industrial Energy Users Group

Enclosures

c: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant.)

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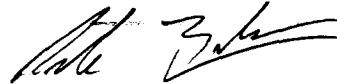
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Dated this 19th day of March, 2014, in Harrisburg, Pennsylvania.