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**Tishekia E. Williams**
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October 14, 2014

**VIA Electronic Filing**

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

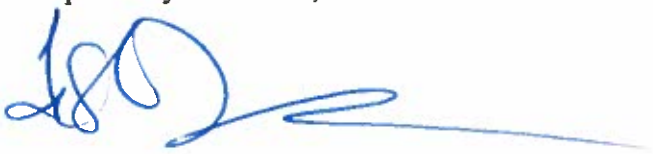
RE: **Implementation of Alternative Energy Portfolio Standards of 2004: Stands for participation of Demand Side Management Resources - Technical Reference Manual 2015 Update**
**Docket Nos. M-2012-2313373, M-00051865.**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's comments regarding the proposed 2015 Technical Reference Manual issued at the above referenced docket.

Should you have any questions, please do not hesitate to contact me or Mr. David Defide at (412) 393-6107.

Respectfully submitted,



Tishekia Williams
Senior Counsel, Regulatory

Enclosures

Cc: Certificate of Service
Dave Defide

**BEFORE THE**
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|---|
| **Implementation of Alternative Energy Portfolio Standards of 2004: Stands for Participation of Demand Side Management Resources- Technical Reference Manual 2015 Update** | : | **Docket No. M-2012-2313373 M-00051865** |

## COMMENTS OF DUQUESNE LIGHT COMPANY

Duquesne Light Company ("Duquesne" or "Company") hereby submits comments in response to the Pennsylvania Public Utility Commission ("Commission" or "PUC") 2015 TRM Annual Update Tentative Order.

## INTRODUCTION

On October 15, 2008, Governor Edward Rendell signed HB 2200 into law as Act 129 of 2008 ("Act 129"), with an effective date of Nov. 14, 2008. Among other things, Act 129 requires Pennsylvania electric distribution companies ("EDCs") such as Duquesne to develop and implement Energy Efficiency and Conservation ("EE&C") plans. The Commission adopted the Technical Reference Manual ("TRM") as a component of the EE&C evaluation process and noted that the TRM would be updated and expanded in its Phase I Implementation Order.[1] On September 11, 2014, the Commission issued a Tentative Order proposing updates to the TRM and soliciting comments from interested stakeholders within 30 days after the publication of notice of the Tentative Order in the *Pennsylvania Bulletin*.[2] Through the annual update process, the TRM has been expanded from roughly 68 pages into a document that is now more than 500 pages as proposed. The expansion of the TRM reflects the extraordinary efforts and increased experience and expertise of the Commission, Statewide Evaluator ("SWE"), EDCs as well as other stakeholders. Duquesne understands the need for TRM updates and appreciates the opportunity to provide comments to the proposed 2015 TRM.

In the September 11, 2014 Tentative Order, the Commission explains that the proposed modifications to the TRM are based upon several major goals including 1) adding protocols for EE&C measures being implemented by the EDCS in their Phase II EE&C plans and broadening

[1] *See* Energy Efficiency and Conservation Program Implementation Order at Docket No. M-2008-2069887.
[2] Notice of the Tentative Order was published in the Pennsylvania Bulletin on September 27, 2014.

the scope of the TRM, 2) balancing the integrity and accuracy of claimed energy savings estimates with the costs incurred to measure and verify the purported energy savings, 3) clarifying the methodology of existing calculations, 4) allowing more flexibility for the EDCs to use territory-specific or compiled data in their calculations of energy savings, and 5) providing additional reasonable methods for measurement and verification of energy savings associated with EE&C measures without excessively burdening EE&C program and evaluation staff.

The Company generally supports the proposed modification to the 2015 TRM and offers some suggested modifications that may help align the 2015 TRM with the Commission's stated goals. The Company's suggested changes are based upon two overarching tenets:

1. Changes requiring significant alterations to EDC tracking systems should be avoided where the value gained from the modification is outweighed by increased administrative burden on the programs;
2. Changes that deviate significantly from industry standards and protocols should be avoided where they increase calculation error or are based upon obsolete information.

The aforementioned issues are discussed in detail below.

## I. ALTERNATIVE SAVINGS CALCULATIONS AND TRACKING REQUIREMENTS

### a. Dual Baselines

The 2015 TRM delineates the differences between the baselines for market-driven activity and discretionary activity in section 1.7. Market-driven activity is defined as including new construction or "Replace on Burnout" ("ROB") where customers are in the market regardless of energy efficiency. Discretionary activity encompasses early replacement where the customer is induced to enter the market through energy efficiency opportunities. Duquesne generally supports these definitions. However, the 2015 TRM adds supplementary language defining the baseline for early replacement as "[f]or all early replacement (EREP) scenarios, the baseline may be the existing equipment efficiency, but at some point the kW and kWh savings calculations must incorporate changes to the baseline for new installations, e.g. code or market changes." The Company understands such language as creating a dual baseline for early replacement. Baselines would now be calculated using existing equipment efficiency and would also be adjusted at a later date for updates to the baseline for new installations, which is

determined by the current code and industry standards. Having a baseline that initially is calculated using the efficiency of existing equipment and then changes to an ROB baseline at some estimated date creates theoretical and practical issues.

From a theoretical perspective, the measure estimated useful life (EUL) is based on prototypical conditions, duty cycle, maintenance and operation. The assumed values may, or may not, represent actual conditions for a given measure. The dual baseline approach makes the baseline entirely variable and project-specific; it is essentially applying an estimate to an estimate. A customer's decision to implement more energy efficient technology is tied to many factors, such as the customer's economic situation, existences of competing investment opportunities, brand/image considerations, product style, features and function. Accordingly, the influence of an energy efficiency program is only one of several important factors that customers use to decide whether or not to replace equipment. These customer dependent factors introduce more ambiguity as to when the baseline equipment might be repaired or replaced. The dual baseline approach adds more uncertainty into savings calculations and cannot be said to increase accuracy.

As a practically matter, calculating savings for an estimated number of years while using the pre-existing baseline, and then switching to calculate savings again for the estimated remaining number of years using a new baseline, doubles the mechanics of the savings calculation. These changes introduce multiple sources of error into the calculation. Importantly, Duquesne will require significant modifications to its tracking system to enable the use of dual baseline capabilities which are likely to result in significant expenditures, which were not included in Duquesne's authorized EE&C Plan budgets, which were based upon the usage of either ROB or early retirement.

Use of dual baselines introduces greater uncertainty and inaccuracy to TRM algorithm inputs, imposes onerous implementation routines, increases the opportunity for calculation error and will drive costly tracking system upgrades. Duquesne requests the SWE remove the dual-baseline language and allow EDCs to cite as baselines pre-existing equipment or standards. That is, to identify installations as either 1) early retirement or 2) replace on burn-out, not both, and to employ identical treatment to cost-effectiveness reporting where TRC costs include either full or incremental measure cost, respectively.

### b. Federal Standard and ENERGY STAR Expirations

Section 1.7 of the TRM also alters the definitions of baselines so that they account for the impact of new federal standards. To add context, the U.S. Department of Energy undertakes multi-year rulemaking proceedings to establish federal minimum efficiency standards for a wide variety of products and equipment. The culmination of these proceedings is the publication of a Final Rule and effective date for the standard (or, by definition the expiration date for the current standard if one exists), after which non-qualifying product can no longer be manufactured or imported. ENERGY STAR specification levels are set via a similar public process by which after the effective date for new specifications, a product that no longer qualifies for ENERGY STAR can no longer be labeled with the ENERGY STAR logo.

The proposed TRM provides that "[w]hen an existing Federal standard expires in a given calendar year, then that change will be reflected in the following program year's TRM… Likewise, it is proposed that when an existing ENERGY STAR specification expires in a given calendar year, then that change will be reflected in the following program year's TRM." In both methodologies, federal standards and ENERGY STAR, there are two critical issues relating to enforcement and sell-through (i.e., the duration of time between production or import of a product and its ultimate retail sale). Enforcement would be difficult in both cases as there is little to no funding for enforcement of the standards or specifications and the time in which market momentum to displace non-compliant products can be long.

Additionally, both standards and specifications require new products to stop entering the market. However products manufactured, imported, or labeled through the effective date of the new standard or specification are allowed to remain available for sale. It can take several years for the standards to align with the market. Good examples of timing issues can be seen with T-12 lighting that remains available on the market today substantially after the date such lighting was prohibited for production and import, and SEER 10 residential air conditioning which continued to be available for sale for years in moderate climates after the SEER 13 standard became effective in 2006. The Company recommends that the timing of such baseline changes be discussed on a case-by-case basis through the existing working groups and other collaborative structures so as not to be bound by a firm rule that will potentially, in fact likely, be revealed as impractical.

### c. Lighting Measure Life

In the sections related to commercial and industrial lighting (i.e., sections 3.1.1, 3.1.2, and Appendix A) an anomaly exists with respect to lighting measure life. In particular, the 2015 TRM lists the measure life for retrofit lighting as 13 years and that of new construction lighting as 15 years. The basis for this distinction is unclear to the Company. If there is a distinction in the measure lives of new construction lighting and retrofit lighting, it would likely not account for the market and customer implications of assigning different measure lives to otherwise identical lighting in otherwise identical installations.

From a customer's perspective, differing measure lives may be confusing and perhaps frustrating. For example, a commodity 28 watt T8 lighting fixture that is installed as a retrofit on one side of a hallway is ineligible for a rebate, while the same fixture across the hall installed as new construction in a repurposed space is eligible for a rebate. From the Company's perspective, this difference in characterization would require the Company to double the number of lighting measures in its tracking systems. In order to account for the two year measure life difference, Duquesne would have to make an extensive system modification. For these reasons, Duquesne recommends the continuation of a consistent 15 year measure life for commercial and industrial lighting.

## II. INDUSTRY STANDARDS FOR PLANNING, IMPLEMENTING AND MEASURING EE PROGRAMS

### a. New Construction Lighting HOU and SVG

Section 3.1.2 of the 2015 TRM proposes significant changes to the hours of use ("HOU") and controls savings factors ("SVG") for lighting in new constructions situations in Section 3.1.2. Currently, the same HOU and SVG are used for both retrofit and new construction. In the case of new construction, the standard practice mandated by SWE has been to develop the measure lives found in Appendix E of the 2015 TRM using the installed lighting only, without accounting for controls. A lighting and design tool, as referenced in Appendix C, is then created using the same pre- and post-installation lighting measures but accounting for the SVG corresponding to the installation of additional controls in excess of those required by code. The 2015 TRM makes the assumption that all new construction lighting is controlled in some fashion and therefore the retrofit HOUs are reduced by 24% (the SVG for basic occupancy sensors) by

default for new construction. The 2015 TRM also provides that any controls such as daylighting that extend beyond simple occupancy sensors are eligible to receive an additional 10% SVG. The proposed methodology in the 2015 TRM is flawed and the methodology utilized in the 2014 TRM provides a more accurate approach.

The baseline conditions used in the 2014 TRM are consistent with the federal standard baseline and ASHRAE 90.1-2007, whereas the 2015 TRM baseline requirements exceed the federal standard baseline and ASHRAE 90.1-2007. Only a well-defined and limited number of space types are required to be on occupancy sensor or other controls and therefore it is not appropriate to reduce the HOU by 24% across the board. ASHRAE 90.1-2007 only requires occupancy sensors in classrooms, conference spaces and employee lunch/break rooms. Under the baseline standards for new construction lighting controls of ASHRA 90.1-2007, the following building types are exempt: lighting in dwelling units, emergency lighting, lighting required by life, health, safety statues; patient care spaces, historic buildings, areas with security concerns, various exterior lighting, lighting in industrial production, material handling, transportation sites and storage areas, etc.. However, the 2015 TRM imposes an assumed 24% controls savings factor on all new construction, as a baseline condition. Therefore, the proposed 2015 TRM exceeds the applicable federal standard and associated content should be removed. The TRM baselines should not exceed applicable federal standards, accordingly, the Company recommends retaining the 2014 TRM approach to HOU and controls for new construction lighting.

**b. LED Eligibility – Appendix F**

The ENERGY STAR specifications found in Appendix F of the 2015 TRM, are obsolete and currently under potentially substantial revisions. These revisions are likely to come into effect during the term of the 2015 TRM. In Duquesne's own program materials, provided to program delivery CSPs and trade allies, the Company uses generic references to ENERGY STAR, calling attention to the "current specification" as the requirement. Duquesne recommends that the TRM use generic references as well since there are often frequent changes to both the specifications and qualified product lists. DesignLights Consortium uses a dynamic interface where both the specifications and qualified products lists are updated frequently. For example, when Appendix F was originally drafted, the consortium's qualified product list covered approximately 9 categories. As of September, DesignLights' qualified product list has

expanded to cover 37 categories. In terms of the technical requirements for documenting a product's equivalency with ENERGY STAR or DesignLights, the requirements have evolved considerably from the current TRM's content and the 2011 release of the Illuminating Engineering Society of North America ("IESNA") TM-21 document regarding lumen maintenance. Duquesne Light recommends that Appendix F be redrafted to reflect the current state of ENERGY STAR, DesignLights and IESNA specifications and standards related to LED lighting.

**c. Electric Chiller Calculation Improvements**

Variable Frequency Drive equipped chillers (VFD or VFD chillers) primarily save energy in an inverse weather-dependent fashion (VFDs in this application save energy in part-load conditions). The protocol in Section 3.2.2 (Electric Chillers) of the draft 2015 Pennsylvania TRM utilizes peak load kW per ton and Equivalent Full Load Hours ("EFLH") and therefore does not quantify the savings impacts of a VFD installed on a chiller. Duquesne recommends substituting Integrated Part Load Values ("IPLV") for full load kW per ton and use annual ton-hrs (EFLH x Tons capacity) to obtain an estimate of VFD (compressor efficiency/capacity control map) and condenser relief (impacts of compressor lift combined with capacity control) savings. Duquesne proposes the implementation of additional algorithms to account for VFD chillers separately from non-VFD chillers. Since VFD chillers primarily save energy in an inverse weather-dependent fashion, the protocol in Section 3.2.2 does not accurately account for items that significantly impact the energy use of a VFD chiller. The current protocol utilizes peak load kW per ton without accounting for the off-design condition energy impacts that variable load and reduced refrigerant lift have on a VFD chiller. The EFLH and the chiller size can be used to determine the total ton-hours produced by a chiller. Then ton-hours and IPLV (or NPLV) can be used to determine the energy use of the new chiller with a VFD and compare it to the base chiller energy use (still using EFLH kW/ton and this production to properly calculate the impact of a VFD).

For new chiller installations, the algorithms in section 3.2.2 (Electric Chillers) of the proposed 2015 TRM to determine the impact to peak kW can be used without modification to determine the peak kW impacts of installing a new chiller equipped with a VFD.

$$\Delta kW_{peak} = Tons_{ee} \, X \, (kW/ton_{base} - kW/ton_{ee}) \, X \, CF \text{ (same equation as in Section 3.2.2)}$$

To keep the documentation requirements for a chiller being changed out to a new chiller with a VFD simpler, it is proposed that we use the base chiller efficiency value from table 3-27 from section 3.2.2 rather than requiring documentation on the existing chiller efficiency. For a chiller being retrofit to use a VFD, the existing chiller documentation for IPLV (or NPLV) will be required.

The reason that EFLH x kW/ton returns a somewhat acceptable result in the calculation of energy use of a chiller in a single chiller plant is that the "standard" unloading schedule for capacity (and related part-load efficiency) and the "standard" condenser relief profile used in the IPLV calculation essentially negate each other in a fashion that results in a numeric value close to the actual savings from a simple chiller change out. For calculating the impacts of VFD Chillers or VFD retrofits, this arithmetic anomaly does not hold true.

When retrofitting an existing chiller with a VFD, there can actually be a small peak kW penalty (2.5 to 4%) from the installation of a VFD which will equal the drive losses at full or nearly full load. However, if the chiller is not fully loaded (100% amps and 100% rated tonnage), there may still be a small chiller efficiency improvement (kW/ton) from a VFD which can offset the drive losses. For the purposes of this calculation protocol, we propose setting the net peak kW impact for retrofitting a chiller with a VFD to zero.

The following algorithm can be used to calculate the energy savings with a VFD chiller:

$\Delta kWh = kWh_{base} - kWh_{VFD}$ (new equation)

$kWh_{base}$ is calculated from one of the following two equations depending on whether the scenario involves the installation of a new chiller with a VFD or whether an existing chiller is being retrofit with a VFD.

For a new chiller installation $kWh_{base}$ is calculated from:

$kWh_{base} = Tons_{ee} \times kW/ton_{base} \times EFLH$ (new equation)

For retrofitting an existing chiller with a VFD, $kWh_{base}$ is calculated from:

$kWh_{base} = Ton\text{-}hrs \times IPLV_{base}$ (new equation)

(again NPLV may be substituted for IPLV for non-standard Air-Conditioning, Heating, and Refrigeration Institute (AHRI) condition chiller selection situations)

$kWh_{VFD}$ is calculated from:

$kWh_{VFD} = Ton\text{-}hrs \times IPLV_{ee}$ (new equation)

New Term Definitions and Documentation Requirements

| | |
|---|---|
| $kWh_{base}$ | = *The energy use of the base chiller* |
| $kWh_{VFD}$ | = *The energy use of the VFD chiller* |
| *Ton-hrs* | = *The ton hours of cooling production for the chiller - calculated by multiplying the chiller capacity by the equivalent full-load hours for the application – see section 3.2.2 in the PA TRM for accepted values:* $Ton\text{-}hrs = Tons_{ee} \times EFLH$ |
| $IPLV_{base}$ | = *The integrated part-load value for the base chiller (or NPLV if site uses other than 44F chilled water set point and 85F entering condenser water at 3 gpm per ton for a design condition). Chiller performance at the individual operating points used to calculate the IPLV or NPLV values will need to be documented with printouts from the manufacturer's selection/performance program that is certified in accordance with the AHRI Water-Cooled Water Chilling Packages Using Vapor Compression Cycle Certification Program - based on AHRI Standard 550/590 (in I-P units).* |
| $IPLV_{ee}$ | = *The integrated part-load value for the new or VFD retrofit chiller (or NPLV if site uses other than 44F chilled water set point and 85F entering condenser water at 3 gpm per ton for a design condition). Chiller performance at the individual operating points used to calculate the IPLV or NPLV values will need to be documented with printouts from the manufacturer's selection/performance program that is certified in accordance with the AHRI Water-Cooled Water Chilling Packages Using Vapor Compression Cycle Certification Program - based on AHRI Standard 550/590 (in I-P units).* |
| $Tons_{ee}$ | = *The capacity of the chiller (in tons) at site design conditions accepted by the program.* |
| $kW/ton_{base}$ | = *Design Rated Efficiency of the baseline chiller. See Table 3-26 and 3-27 in the PA TRM for values.* |

| | |
|---|---|
| $kW/ton_{ee}$ | = *Design Rated Efficiency of the energy efficient chiller from the manufacturer data and equipment ratings in accordance with ARI Standards.* |
| $EER_{base}$ | =*Energy Efficiency Ratio of the baseline unit. See Table 3-24 in the PA TRM for values.* |
| $EER_{ee}$ | =*Energy Efficiency Ratio of the efficient unit from the manufacturer data and equipment ratings in accordance with ARI Standards.* |
| *CF* | = *Demand Coincidence Factor (See Section 3.2.2)* |

**d. Multi-Chiller Plant Chiller Retrofits**

Unfortunately, Section 3.2.2 of the proposed 2015 TRM is not capable of, and is specifically excluded from being used for calculating the benefit of installing a high efficiency chiller in a multi-chiller installation. An additional section related to chiller retrofits in multi-chiller plants should also be added to the 2015 Pennsylvania TRM after Section 3.2.2 – Electric Chillers and after Duquesne's proposed Section 3.2.3 – VFD Chillers and Adding VFD's to Existing Chillers and would become 3.2.4

Duquesne requests the addition of a protocol to estimate the savings for installing high efficiency electric chillers, with or without VFD's, as compared to chillers that meet the minimum performance allowed by the UCC in a facility that has multiple chillers. As a starting point, the protocol can use the same definition of terms, the same baseline efficiencies for single chiller-plant new chiller installation, and similar savings calculation equations. The primary difference for the requested protocol is a significant modification to the IPLV or NPLV approach/methodology to better address the part load operation percentages and operating hours of chillers installed in a multi-chiller plant. The basis of the modified calculation methodology would be the same data and calculations used to develop and derive the standard IPLV and NPLV equation (percent loaded weighting factors).

### c. Refrigerator / Freezer Recycling with and without Replacement

Duquesne also requests a modification to the proposed 2015 TRM in order to better account for replacement appliances in Section 2.4.3. Duquesne proposes that reductions in savings due to recycled appliances being replaced with other appliances (e.g., a new refrigerator replacing the one that was recycled through an Act 129 program) should only occur when the replacement has been induced by the program and would not have occurred otherwise. Treating replacements in this manner is consistent with the current National Renewable Energy Laboratory/Department of Energy Uniform Methods Project (UMP) protocol for evaluating appliance recycling programs. The UMP protocol also currently serves as the basis for the Statewide Evaluator's recommended approach to estimating net-to-gross factors for recycled appliances.

We respectfully request that the 2015 TRM discussion of "Refrigerator / Freezer Recycling with and without Replacement" be modified to account for this distinction. Specifically, we recommend that the paragraph immediately preceding Table 2-79 be modified with the addition of the following, or similar text:

> *"Note that the discounting of savings due to replacement should only occur when the recycled unit has been shown to have caused the replacement appliance to have been purchased/installed. Simple replacement of the recycled unit, in and of itself, does not justify discounting the savings by the replacement unit's estimated energy consumption, because such replacements most often occur independent of whether an appliance is being recycled. Units that have been replaced, but have not caused their replacement to occur, should receive full savings without discounting based on the replacement unit's energy use. Notwithstanding this exception, the following tables pertain to the discounting of appliance recycling savings when the program (i.e., its marketing, education effort, free appliance collection and/or incentive payment) has caused a replacement appliance of the same type to be obtained."*

Duquesne has also located a discrepancy the Estimated UEC Savings value designated for Duquesne Light for "Residential Refrigerator Recycling with Replacement with an Energy Star Refrigerator" in Table 2-79." The value in Table 2-79 appears to contain an extra digit at the beginning of the number. It appears most likely that there is an extra "1" in front of the actual number.

Duquesne also recommends a modification related to the deemed savings value to account for replacement appliances that are not energy star compliant, which current is absent in the proposed 2015 TRM. Section 2.4.3 of the 2015 TRM addresses appliances that have been recycled and not replaced, as well as appliances that have been recycled and replaced with Energy Star appliances. However, this section does not address another scenario: appliances that have been replaced but with appliances that are non-Energy Star. Duquesne recommends that the 2015 TRM include an assumed energy consumption of non-Energy Star appliances so that savings for appliances recycled in this type of situation can be deemed as the other scenarios noted above are. The 2013 TRM explicitly addressed this scenario.

**f. ENERGY STAR Refrigerated Beverage Machine**

Duquesne requests a change to the labeling of Table 3-140 in Section 3.7.5 of the proposed 2015 TRM. The title of the table should be changed from "Table 3-140: Default Beverage Vending Machine Energy Consumption" to "Table 3-140: Default Beverage Vending Machine Savings" in order to reflect the intent of the table content. The table depicts default savings for "Equipment Class A" is 1,422 kWh. Based upon the relevant algorithms in this section and the default values found in Table 3-139, the savings related to "Equipment Class A", as shown below, should be 71 kWh.

| | | Constant | V-cu$^3$ | Constant | Days | kWh |
|---|---|---|---|---|---|---|
| Base Case Use | =(0.055V + 2.56) X 365 | 0.055 | 24.3 | 2.56 | 365 | 1422 |
| Class A Use | = (0.0523V + 2.432) X 365 | 0.0523 | 24.3 | 2.432 | 365 | 1352 |
| Class A Savings Δ kWh | | | | | | 71 |

Hence, Table 3-140 should be corrected as shown below:

**Table 3-140: Default kWh Savings**

| Equipment Class | Default kWh Savings |
|---|---|
| Class A | 71 |
| Class B | 180 |

### g. Table 3-28 Chiller EFLHs for Pennsylvania Cities

Duquesne Light notes that the 2014 TRM base line EFLHs were extremely conservative, technically feasible from an engineering perspective, but very optimistic in terms of how any such baseline mechanical system would be operated. However, the 2015 TRM chiller EFLH values for the office building types values are significantly lower yet (e.g., 38% lower for offices). The EFLH values provided in Table 3-28 were developed by Nexant's e Quest modeling analysis in 2014. It would be helpful to include in an appendix relevant input assumptions or any peer review studies or published studies that might support these reduced values.

## III. CONCLUSION

Duquesne supports the Commission's effort to update the TRM for new measures, to improve the accuracy of processes and calculations, and to account for regulatory updates. Duquesne also supports the majority of the changes proposed in the 2015 TRM. However, Duquesne respectfully requests that the Commission reconsider what would amount to requiring substantial changes to the tracking systems where the benefit of the modification outweighs the cost and increased administrative burden. The Company also recommends maintaining current industry standard practices for planning, implementing, and measuring energy efficiency programs should be maintained. Additionally, the use of arbitrarily defined baselines should be avoided.

Respectfully Submitted:

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Dated: 10/14/14

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. § 1.54 (relating to service by a participant).

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Date: October 14, 2014