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May 1, 2015

Via Electronic Filing

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

Re: Act 129 Energy Efficiency and Conservation Program Phase III; Docket No. M-2014-2424864; **COMMENTS OF THE PENNSYLVANIA STATE UNIVERSITY'S**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission The Pennsylvania State University's Comments in the above-referenced proceeding. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

Thomas J. Sniscak
Christopher M. Arfaa

*Counsel for
The Pennsylvania State University*

TJS/CMA/das
Enclosures

cc: Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Act 129 Energy Efficiency and
Conservation Program Phase III

Docket No. M-2014-2424864

**COMMENTS OF
THE PENNSYLVANIA STATE UNIVERSITY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

On October 23, 2014, Pennsylvania Public Utility Commission (Commission) issued a Secretarial Letter in the above-referenced proceeding seeking comments on topics instrumental in designing and implementing a potential Phase III Energy Efficiency & Conservation (EE&C) Program pursuant to Pennsylvania Act 129 of 2008. On December 19, 2014, the Pennsylvania State University (Penn State or the University) submitted comments (December 2014 PSU Comments) on several of the topics raised in the Secretarial Letter. On March 11, 2015, the Commission issued a Tentative Implementation Order, in which the Commission set forth, for public comment, its proposals for implementing Phase III of the EE&C Program pursuant to Pennsylvania Act 129 of 2008. Penn State applauds the Commission's efforts in this regard and appreciates the opportunity to submit these Comments.

The Tentative Implementation Order incorporates a number of suggestions contained in the December 2014 PSU Comments. However, it also proposes that electric distribution companies (EDC) file EE&C Plans "to obtain a minimum of 3.5% of all EE [energy efficiency] requirements from the federal, state and local governments, including municipalities, school

districts, institutions of higher education and nonprofit entities.”¹ The Commission thus tentatively declined to adopt the recommendations of Penn State, the Office of Consumer Advocate, PECO, Energy Efficiency for All, Keystone Energy Efficiency Alliance, the City of Philadelphia, Citizens for Pennsylvania’s Future, the Clean Air Council, the Sierra Club and the Environmental Defense Fund that EDC EE&C Plans provide that at least ten percent (10%) of required reductions in both consumption and demand be obtained from the government, educational and non-profit sector.

Given the budgetary constraints that the government, educational and non-profit customers face, PSU continues to believe that concentration of EDC EE&C efforts in that sector is warranted. Therefore, Penn State recommends that the Commission modify its Phase III implementation order to incorporate Act 129’s requirement² that at least ten percent (10%) of required reductions be obtained from the government, educational and non-profit sector.

Respectfully submitted,



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Counsel for
THE PENNSYLVANIA STATE UNIVERSITY

DATED: May 1, 2015

¹ Tentative Implementation Order at 61.

² 66 Pa. C.S. § 2806.1(b)(1)(B).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Thomas J. Sniscak

Dated this 1st day of May, 2015

Thomas J. Sniscak
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