

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Implementation of the Alternative Energy :  
Portfolio Standards Act of 2004: :  
Standards for the Participation of Demand :  
Side Management Resources – Technical : **Docket No. M-00051865**  
Reference Manual 2012 Update :

**REPLY COMMENTS OF METROPOLITAN EDISON COMPANY,  
PENNSYLVANIA ELECTRIC COMPANY,  
PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY TO  
THE TENTATIVE ORDER REGARDING THE  
TECHNICAL REFERENCE MANUAL 2012 UPDATE**

On September 22, 2011, the Pennsylvania Public Utility Commission (“Commission”) adopted a Tentative Order in the above-captioned proceeding proposing revisions and recommended updates to the existing Technical Reference Manual (“TRM”), which is being used to help validate savings and provide support for the implementation of Act 129 of 2008 (“Act 129”)<sup>1</sup>. A notice seeking comments to the Tentative Order and proposed revisions and updates to the TRM appeared in the *Pennsylvania Bulletin* of October 8, 2011, and invited interested parties to submit comments on the 2012 TRM Update within 20 days (or October 28, 2011) and reply comments within 30 days (November 7, 2011). Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively “the Companies”) hereby submit their brief reply comments.

First, the Pennsylvania Ski Area Association (“PSAA”) proposes a protocol relating to a snowmaking measure that appears to be reasonable and consistent with custom measure protocols used for such projects. While the Companies and their evaluators have not received any comparable applications, or reviewed the technical details of the recommended protocol in

---

<sup>1</sup> 66 Pa. C.S. 2806.1.

detail, the Companies would support working through those details using this protocol with any customers that apply with a specific project.

Second, UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc., UGI Central Penn Gas, Inc. (collectively “UGI”) raise a number of issues related to fuel substitution that do not appear to be related to measurement of savings (e.g., the influence of programs on fuel choice and several topics related to total resource cost tests such as “total fuel cycle”, price projections, etc.). As such, the Companies do not offer reply comments to those points. However, relative to UGI’s suggestion that gas companies be included as participants on the TRM Technical Working Group (“TWG”), the Companies suggest that the TWG is not closed to any party, but that more active engagement of gas utilities would be appropriate when energy efficiency targets and programs are mandated for natural gas utilities.

Third, EnerNOC raises two valid points related to the details of application of PJM Business Rules to Act 129 demand response programs. Specifically EnerNOC suggests that complications will arise if the start time for PJM events and Act 129 events do not coincide and that there may be potential confusion arising from overlapping Act 129 events, PJM economic events and PJM emergency events. The Companies support EnerNOC’s suggested solution to the extent it is practicable and restate that they anticipate many challenges when trying to put this demand response section into practice and urge the Commission to be patient as all Electric Distribution Companies proceed.

Lastly, PPL Electric Utilities Corp. (“PPL”) comments that impacts associated with refrigerators under the appliance recycling programs should be credited with a consistent value of 1,659 kWh/year. The Companies support PPL’s comment for the reasons PPL articulated,

namely that the savings value should focus on the removal of the refrigerator from the grid (i.e., all customers) as opposed to what savings may impact an individual participant.

The Companies again thank the Commission for the opportunity to provide comments on the Commission's proposed revisions to the TRM and look forward to continuing to work with the Statewide Evaluator, TWG and Commission Staff on this critical aspect of Act 129 compliance.

Respectfully submitted,

Dated: November 7, 2011.

---

Kathy Kolich  
Attorney No. 92203  
FirstEnergy Service Company  
76 S. Main Street  
Akron, OH 44308  
Phone: (330) 384-4580  
Fax: (330) 384-3875  
Email: [kjkolich@firstenergycorp.com](mailto:kjkolich@firstenergycorp.com)

Counsel for:  
Metropolitan Edison Company,  
Pennsylvania Electric Company,  
Pennsylvania Power Company and  
West Penn Power Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Implementation of the Alternative Energy       :**  
**Portfolio Standards Act of 2004: Standards       :**  
**for the Participation of Demand Side           :**       **Docket No. M-00051865**  
**Management Resources – Technical           :**  
**Reference Manual Update                       :**

**CERTIFICATE OF SERVICE**

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

Service by overnight Federal Express, as follows:

Rosemary Chiavatta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Service by electronic mail, as follows:

Gregory A. Shawley  
Bureau of Technical Utility Services  
[gshawley@state.pa.us](mailto:gshawley@state.pa.us)

Kriss Brown, Esq.  
Assistant Counsel  
Law Bureau  
[kribrown@state.pa.us](mailto:kribrown@state.pa.us)

Dated: November 7, 2011

---

Kathy J. Kolich  
Attorney No. 92203  
FirstEnergy Service Company  
76 S. Main Street  
Akron, OH 44308  
Phone: (330) 384-4580  
Fax: (330) 384-3875  
Email: [kjkolich@firstenergycorp.com](mailto:kjkolich@firstenergycorp.com)