

**Pennsylvania Public Utility Commission
Demand Side Response Working Group**

COMMENTS OF THE PENNSYLVANIA UTILITY LAW PROJECT
REGARDING THE REPORT ON CONSERVATION, ENERGY EFFICIENCY, DEMAND
SIDE RESPONSE AND ADVANCED METERING INFRASTRUCTURE

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The Pennsylvania Utility Law Project (“PULP”) submits these comments for the consideration of the Demand Side Response Working Group (“Working Group”). PULP, as part of the Pennsylvania Legal Aid Network, provides statewide representation, advice, and support in energy and utility matters on behalf of low income consumers. PULP appreciates the opportunity to provide the Working Group with its input and views.

For the most part, PULP believes that the April 13, 2007 *Draft Report On Conservation, Energy Efficiency, Demand Side Response, And Advanced Metering Infrastructure* fairly characterizes the discussions of the Working Group. However, **Section VIII Program Funding and Cost-Recovery** of the Draft Report would benefit from two additions.

PULP recommends the Working Group include in this section an acknowledgment of the special circumstances of low income customers. These customers have fragile financial situations that can not sustain even a small additional charge. Whether the charge is a systems benefit charge or some other added fee, it will weigh heavily on a population already struggling to pay for essential utility service. The Working Group should highlight to the Commission that any additional fee or charge for conservation, energy efficiency, demand side response, or advanced metering infrastructure should be fully subsidized for low income customers.

Additionally, when considering funding mechanisms for these new conservation, energy efficiency, demand side response, or advanced metering infrastructure programs, the Report should caution the Commission against replacing, reducing, or in any way limiting the existing funding for the LIURP programs. Any Demand Side Response programming should be funded in addition to and as a supplement to any LIURP programming.

Respectfully submitted,

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