



November 17, 2008

James J. McNulty, Esq., Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, Pennsylvania 17105-3265

RE: Comments of Penn State University's Cooperative Extension on the Implementation of Act 129 Provisions covering Energy Efficiency, Conservation and Alternative Energy Measures at Docket # M-2008-2069887

Dear Secretary McNulty:

On behalf of Penn State University's Cooperative Extension, I want to offer my appreciation to the Commission and Commission staff for the opportunity to provide input on the successful implementation of the Act 129 legislation. The legislative intent, we believe, is extremely timely and of utmost importance as our organization focuses a state-wide effort to educate consumers of all classes and supports the implementation of conservation and renewable technologies as the Commonwealth transitions to a sustainable energy marketplace

As background, Penn State's Cooperative Extension Outreach function is uniquely positioned to participate in this effort because of our long standing presence in every county of the Commonwealth. Specifically, Cooperative Extension has fully staffed functioning offices on a county by county basis. Extension staff has cultivated longstanding relationships with local governing bodies, trade organizations, service groups and communities on a variety of levels and have been in the business of providing local programming and support for many decades. Leveraging these well developed and respected relationships in pursuit of the successful implementation of Act 129 in nothing short of a natural "fit" for Cooperative Extension.

In terms of recognition of the importance of moving toward a sustainable energy marketplace, Penn State University, a top fifteen research institution in terms of total annual investment in the United States, has made a major philosophical and financial commitment toward a successful long term outcome. My position in Cooperative Extension, as Educator, Renewable Energy Development is an example of the commitment to move the Commonwealth's energy marketplace in the direction of sustainability. Just three years and 11 months ago that I sat in one of these seats before the Commissioners and reported on the successes and lessons learned from the first and only Real-time residential electric pricing pilot program that functioned in the Commonwealth from the summer of 2002 through the end of the 1st quarter of 2005. While that story and experience is lost and forgotten by the investor owned utility involved, the value and the importance of warehousing and retaining that legacy for future use has not been lost by the University or Cooperative Extension.

Going forward, we respectfully request that the Commission reflect on the outcomes of efforts such as the Demand Side Response Working Group that meet through the years from 2001 through 2005 and then reconvened briefly in 2006 to issue a report of findings. The involvement of the Investor Owned Utilities through that period was voluntary and the results as might have been expected by most parties involved were less than remarkable. Under the directive of Act 129 there are now prescriptive outcomes that are to be met or strict penalties apply. We are at this juncture today because the voluntary efforts of the past were less than real commitments in vision, manpower, time, and money. Penn State, through its Cooperative Extension Outreach group is prepared to work with the Commission, the Investor Owned Utilities and third party Conservation Services Providers in a variety of roles to be determined through consensus, to help ensure the benefits of these programs reach all classes of energy consumers as evenly and equitably as possible. Through the saturation Cooperative Extension, by virtue of its working presence in all counties of the Commonwealth, can assist by educating consumers about conservation, and renewable energy opportunities and where program availability is lacking help to muster public and private sector resources to alleviate shortages of opportunity.

In terms of general program options Cooperative Extension suggests that options be variable and reflective of the needs by region. For example in areas where electric hot water heating is of high concentration program focus can take a page out of lessons learned from the American Public Power Association and offer water heater control programming. When considering central heating and cooling replacement systems all regions must have options for cost effective consideration of geothermal heating and cooling. If qualified Conservation Service Providers are lacking, Cooperative Extension can assist in raising awareness to valuable business opportunities by contractors to become qualified in order to meet growing demand for these sustainable energy services.

There is also a need for assertive quality control and assurance that would provide a valuable service Cooperative Extension could provide support for. In order for as expansive and comprehensive program as the legislation envisions to be successful, standards in terms of quality of work product and performance will need to be established. As a non-competitive third party, Cooperative Extension could be tasked to assist the Commission in its oversight requirements. With a reasonable effort standards for a variety of measures could be established program-by-program with input from interested parties, followed by specific training that could be provided through Cooperative Extension to build a staff of "Verifiers" who would confirm installation and quality of program measures, the results of which the local county offices of Extension could aggregate and report to the Commission at specific time intervals.

As these examples outline there a number of opportunities that, at a first glance, would provide meaningful engagement of existing resources of Penn State University's Cooperative Extension affiliation. In addition, a legacy of successful efforts of Renewable Energy Development, Demand Response and Conservation programming within the state have been preserved by the foresight of the University and remain as an asset to be leveraged. Couple these two distinct benefits with the vast reach, knowledge base, and support of Penn State University and it is easy to see why, we believe, Cooperative Extension could play a central role in fulfillment of the positive transition of the Pennsylvania energy market toward a sustainable future.

We are very appreciative of the opportunity to share our vision, and emphasize our strengths with the Commission and Staff and other interested parties. We are looking forward to defining a role for Cooperative Extension with the potential of raising the value of every dollar invested toward securing Pennsylvania's sustainable energy future while leverage the trust and relations of our constituents that have been years in the making.

Sincerely,

Edward V. Johnstonbaugh, Educator, Renewable Energy Development
Cooperative Extension in Westmoreland County
Pennsylvania State University