

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 7, 2011

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Joint Petition of Metropolitan Edison
Company, Pennsylvania Electric Company
and Pennsylvania Power Company for
Expedited Approval of Amendments to the
Residential HVAC Program and
Governmental & Institutional Components of
the C/I Equipment Programs
Docket Nos. M-2009-2092222
M-2009-2112952
M-2009-2112956

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of the Office of Consumer Advocate, in the above
referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Aron J. Beatty".

Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

Enclosure

cc: Administrative Law Judge
Office of Special Assistants

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Expedited Approval of Amendments to the Residential HVAC Program and Governmental & Institutional Components of the C/I Equipment Programs	:	Docket Nos.	M-2009-2092222
	:		M-2009-2112952
	:		M-2009-2112956
	:		
	:		
	:		

ANSWER OF THE
OFFICE OF CONSUMER ADVOCATE

On February 18, 2011, the Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company (the FirstEnergy Companies) filed two Joint Petitions concerning their Energy Efficiency and Conservation (EE&C) plans. In both Petitions, the Companies requested Commission approval to modify their EE&C plans. The Companies separated their requested modifications into two petitions due to the pressing need to make some, but not all, of their proposed modifications in time for implementation in the Spring of 2011. The Companies have termed the petitions as the “Expedited Petition”¹ and the “Main Petition.”²

¹ RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Expedited Approval of Amendments to the Residential HVAC Program and Government & Institutional Components of the C/I Equipment Programs, Docket Nos. M-2009-2092222, M-2009-2112952 and M-2009-2112956. The Petition was filed February 18, 2011, and seeks Commission approval no later than March 17, 2011.

² RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Amendment of the Orders Approving Energy Efficiency and Conservation Plans and Petition for Approval of First Amended Energy Efficiency and Conservation Plans, Docket Nos. M-2009-2092222, M-2009-2112952 and M-2009-2112956. The Petition was filed February 18, 2011, and seeks Commission approval no later than May 19, 2011.

Both Petitions are supported by testimony filed with the Main Petition. The Office of Consumer Advocate (OCA) has reviewed both Petitions and is filing this Answer to the Expedited Petition. The OCA will file a separate Answer to the Main Petition.

The OCA does not object to allowing the Companies to move forward with the changes to the residential program proposed in the Expedited Petition at this time. The Companies' rationale for seeking expedited treatment of certain residential Plan modifications appears to be reasonable. The Companies have requested permission to enhance their HVAC tune-up program for residential customers. Companies' witness Fitzpatrick testified that studies have shown that most HVAC tune-ups occur in the spring before the start of the summer cooling season. See, FirstEnergy St. 1 at 17. In order to maximize the results from the HVAC tune-up program, Mr. Fitzpatrick testified that the program must launch by April 1, 2011. Id. The HVAC tune-up change will be implemented within the already approved budgets and will not impact any customer's rates. Petition at ¶9. The OCA does not object to making this change on an expedited basis.³

The OCA further submits that expedited review is reasonable at this time because the Commission and parties will have an opportunity to address the proposed changes in the Main Petition proceeding that will follow the Expedited Petition. The OCA submits that the issues addressed in the Expedited Petition should be open to further review and analysis, if needed, in the Main Petition proceeding. Given the opportunity to more thoroughly review any

³ In addition to the HVAC tune-up modification, the Companies propose to make two additional changes. First, the Companies propose to add an Energy Conservation Kit offering to Governmental and Institutional customers within the small C/I equipment program. Petition at ¶5. Second, the Companies propose to increase the Government and Institutional incentive levels to be consistent with those offered in both the Large and Small Commercial and Industrial customers' equipment programs. Petition at ¶6. The Companies state that these changes will be made within each programs existing budget. Petition at ¶9. The OCA does not have any objection to these proposed changes at this time.

modifications in the Main Petition proceeding, the OCA does not object to approval of the Expedited Petition at this time.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company	:	Docket Nos. M-2009-2092222
and Pennsylvania Power Company for	:	M-2009-2112952
Expedited Approval of Amendments to	:	M-2009-2112956
the Residential HVAC Program and	:	
Governmental & Institutional Components	:	
of the C/I Equipment Programs	:	

I hereby certify that I have this day served a true copy of the foregoing document, Answer of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of March 2011.

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