

CITIZEN POWER

Public Policy Research Education and Advocacy

November 7, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for e-filing, are the Reply Comments of Citizen Power, in the above-referenced proceeding.

Should you have any questions, do not hesitate to contact me.

Respectfully Submitted,



Theodore Robinson
Counsel for Citizen Power

Enclosures

Cc: Gregory A. Shawley, CEEP – via electronic mail: gshawley@state.pa.us
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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
Reference Manual 2011 Update

Docket No. M-00051865

REPLY COMMENTS OF CITIZEN POWER

Citizen Power is a regional nonprofit, public policy research, education and energy advocacy organization based in Pittsburgh. Since 1996, Citizen Power has worked for safe, clean and affordable energy. We would like to thank the Pennsylvania Public Utility Commission for the opportunity to submit reply comments.

Citizen Power considerably disagrees with the comments of PPL Electric Utilities Corporation (“PPL”) regarding the Refrigerator/Freezer Recycling and Replacement measure. In their comments, PPL states that “all refrigerators should have a gross deemed saving of 1659 kWh/yr, regardless of whether they are replaced with an ENERGY STAR unit, replaced with a non ENERGY STAR unit or not replaced.” *PPL Comments*, p.6. However, the measure itself has two components, recycling and replacement. The estimated usage of the replacement refrigerator or freezer is therefore relevant in determining the gross savings of the measure.

Respectfully Submitted,



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