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VIA ELECTRONIC FILING

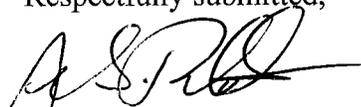
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Energy Efficiency and Conservation Program (Amended Demand Response Study)
Docket Nos. M-2012-2289411 & M-2008-2069887**

Dear Secretary Chiavetta:

Enclosed for filing are the Reply Comments of PPL Electric Utilities Corporation to the above-referenced proceeding.

Respectfully submitted,



Andrew S. Tubbs

AST/jl
Enclosure

cc: Megan Good (*Word version via E-Mail*)
Kriess E. Brown (*Word version via E-Mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and Conservation Program : Docket Nos. M-2012-2289411
(Amended Demand Response Study) : M-2008-2069887

**REPLY COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

On November 14, 2013, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order¹ in the above-captioned proceeding. The Commission’s *Demand Response Tentative Order* was published in the *Pennsylvania Bulletin* on November 30, 2013. Through its *Demand Response Tentative Order*, the Commission released for comment its amended Act 129 Demand Response Study (“Amended DR Study”), which includes the Preliminary Wholesale Price Suppression and Prospective Total Resource Cost (“TRC”) Test Analysis prepared by the Statewide Evaluator (“SWE”) to assess the cost-effectiveness of the Phase I peak demand reduction program. In addition, the Commission requested comments on a proposed alternative peak demand reduction program for inclusion in a subsequent phase of the energy efficiency and conservation (“EE&C”) program. The following parties filed Comments at the above captioned docket:

Office of Consumer Advocate (“OCA”); Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, “First Energy Companies”); PECO Energy Company (“PECO”); Comverge, Inc., EnerNOC,

¹ *Energy Efficiency and Conservation Program*, Tentative Order at Docket Nos. M-2012-2289411 and M-2008-2069887 (Order Entered November 14, 2013) (“*Demand Response Tentative Order*”).

Inc., and Johnson Controls, Inc. (collectively, “DR Providers”); Industrial Energy Consumers of Pennsylvania, Duquesne Industrial Intervenors, Met-D Industrial Users Group, Penelec Industrial Customer Alliance, Penn Power Users Group, Philadelphia Area Industrial Energy Users Group, PP&L Industrial Customer Alliance, and West Penn Power Industrial Intervenors (collectively, “Industrial Customer Groups”); Energy Association of Pennsylvania; Electric Power Generation Association (“EPGA”); and Citizens for Pennsylvania’s Future, Clean Air Council, Keystone Energy Efficiency Alliance, and The Sierra Club (“Joint Commenters”).

PPL Electric appreciates the opportunity to reply to the comments submitted by the other parties and responds to those comments below.

I. BACKGROUND

On July 1, 2009, in compliance with Section 2806.1(b)(1)(i) of Act 129, PPL Electric filed its Phase I EE&C Plan for the period of June 1, 2009 through May 31, 2013 (“Phase I EE&C Plan”). PPL Electric’s Phase I EE&C Plan was approved, with modification, by the Commission on October 26, 2009.² The Commission thereafter approved several modifications to PPL Electric’s Phase I EE&C Plan.³

On August 3, 2012, the Commission issued its Phase II EE&C Plan Implementation Order, which determined the required consumption reduction targets for each electric distribution company (“EDC”) and established guidelines for implementing Phase II (June 1, 2013 – May 31, 2016) of the EE&C program.⁴ In addition, the Commission determined not to set additional peak demand reduction requirements for the EDCs’ Phase II EE&C Plans. *2012 Implementation*

² *Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216, 2009 Pa. PUC LEXIS 2242 (October 26, 2009).

³ *See, e.g., Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216, 2010 Pa. PUC LEXIS 392 (February 17, 2010); *Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216, 2011 Pa. PUC LEXIS 2009 (May 6, 2011).

⁴ *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887, 2012 Pa. PUC LEXIS 1259 (Implementation Order entered on August 3, 2012) (“*2012 Implementation Order*”).

Order, p. 38 The Commission stated that it was unable to set additional peak demand reduction requirements prior to completing its assessment of the cost-effectiveness of the EDCs' Phase I EE&C Plans' peak demand programs. *2012 Implementation Order*, p. 38.

On November 15, 2012, pursuant to Act 129 and the Commission's *2012 Implementation Order*, PPL Electric filed a Petition with the Commission requesting approval of its Phase II (June 1, 2013 – May 31, 2016) Energy Efficiency and Conservation Plan ("Phase II EE&C Plan" or the "Plan"). The Commission approved PPL Electric's Phase II EE&C Plan, with modifications, on March 14, 2013.⁵ Pursuant to the *March 2013 Order*, on May 13, 2013, PPL Electric submitted a compliance filing. The Commission approved PPL Electric's compliance filing on July 11, 2013.⁶

PPL Electric has actively participated in all of the proceedings instituted by the Commission to implement Act 129. The Company appreciates the opportunity to provide reply comments on the Amended DR Study and the potential subsequent demand reduction program. PPL Electric's reply comments will provide the Commission with a valuable perspective in its evaluation of demand response ("DR") programs for Phase III of the EDCs' EE&C Programs.

II. REPLY COMMENTS OF PPL ELECTRIC

A. SUMMARY

- Additional demand reduction requirements (compliance targets) are not permissible because the Phase I DR programs were not cost-effective.
- Any future Act 129 DR would unfairly compete with competitive market DR programs and retail electric markets, would force customers to choose between Act 129 DR and PJM DR programs, would not provide incremental DR above the optimum level provided by competitive markets, and would force EDCs to overpay/oversubscribe their Act 129

⁵ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (March 14, 2013) ("*March 2013 Order*").

⁶ *Petition of PPL Electric Utilities Corporation for Approval of its Phase II Act 129 Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order Entered July 11, 2013) ("*July 2013 Order*").

DR program to attract participants away from PJM programs and to ensure EDCs meet their DR compliance target. Act 129 DR would also interfere with EGSs offering DR programs to customers in conjunction with long-term or other preferential pricing, such as time-of-use and critical peak pricing.

- Attempts to increase the apparent cost-effectiveness of future Act 129 DR programs by changing the rules/parameters for determining DR benefits and costs are not valid, are speculative at best, and overstate DR benefits significantly.

B. ADDITIONAL DEMAND REDUCTION COMPLIANCE TARGETS ARE NOT PERMISSIBLE BECAUSE ACT 129 DR PROGRAMS WERE NOT COST-EFFECTIVE IN PHASE I

PPL Electric maintains that the Commission is not permitted by the Act 129 statute to set additional DR targets since the Phase I DR programs were not cost-effective. Specifically, as stated in PPL Electric's Comments, Act 129 states that the Commission shall set additional demand reduction targets (beyond the end of Phase I on May 31, 2013) if DR benefits exceed the costs.⁷ Specifically, Act 129 provides:

By November 30, 2013, the commission shall compare the total costs of energy efficiency and conservation plans implemented under this section to the total savings in energy and capacity costs to retail customers in this Commonwealth or other costs determined by the commission. If the commission determines that the benefits of the plans exceed the costs, the commission shall set additional incremental requirements for reduction in peak demand for the 100 hours of greatest demand or an alternative reduction approved by the commission. Reductions in demand shall be measured from the electric distribution company's peak demand for the period from June 1, 2011, through May 31, 2012. The reductions in consumption required by the commission shall be accomplished no later than May 31, 2017.

66 Pa.C.S. § 2806.1(d)(2). It is a definitive requirement that DR actually be cost-effective. However, the Commission's own DR Study, its Amended DR Study, and the EDCs' Program Year 4 Final Annual Reports all demonstrate that the Phase I DR programs were not cost-effective. In their comments, OCA, the Joint Commenters, EPGA, First Energy Companies, and

⁷ See 66 Pa.C.S. § 2806.1(d)(2).

Industrial Customer Groups all accept the conclusion that Act 129 DR programs were not cost-effective in Phase I.⁸ The DR Providers suggest that with further modifications, DR programs could become more cost effective. DR Providers, p. 7. Therefore, no further DR programs should be included in any potential Phase III EE&C Plans.

In addition, the Commission itself has found that Section 2806.1(d)(2) requires actual cost-effectiveness to be shown. In its *2012 Implementation Order*, the Commission concluded “that the language at 66 Pa.C.S. § 2806.1(d)(2), regarding the comparison of the costs and benefits, is clear in that the Commission may only impose additional peak demand reduction requirements *if proven to be cost-effective.*” *2012 Implementation Order*, p. 38 (emphasis added).

C. ANY FUTURE ACT 129 DR WOULD UNFAIRLY COMPETE WITH COMPETITIVE MARKET DR PROGRAMS AND RETAIL ELECTRIC MARKETS

PPL Electric agrees with Industrial Customer Groups that Act 129 DR programs would unfairly compete with and distort competitive wholesale electric and capacity markets.⁹

The Amended DR Study recommends that customers should not be permitted to simultaneously participate in a PJM DR program and an Act 129 program.¹⁰ PPL Electric agrees. However, that requirement will force a customer to choose between the PJM DR program and the Act 129 DR program, effectively creating competition between the two DR programs. If the customer chooses the Act 129 DR program, it would not provide any incremental DR compared to the PJM program and would merely supplant reductions from the

⁸ OCA Comments, p. 3; Joint Commenters Comments, p. 2; EPGA, pp. 4, 6; First Energy Comments, p. 5; Industrial Customer Groups Comments, p. 3.

⁹ Industrial Customer Groups Comments, p. 2.

¹⁰ Amended DR Study, p. 66.

PJM program. If the customer chooses the PJM program, the EDC risks non-compliance with Act 129.

To ensure customers choose the Act 129 DR program over the PJM DR programs, EDCs would have to “overpay” customers in order to attract their participation in Act 129 DR. As the DR Providers correctly noted in their comments: “The necessary consequence of such a formulation [Act 129 DR incentives should be less than PJM DR incentives, and dual participation in PJM ELRP and Act 129 DR are not permitted], particularly in the face of expected dispatches in ELRP that are less frequent than is likely to be the case under Act 129, is that no rational customer capable of participating in both programs would choose to participate in Act 129.”¹¹

In addition, since Act 129 DR is mandatory for the EDC, the EDC would have to ensure that its DR participants meet their DR requirements. Since all participants are unlikely to meet their DR requirements for every event, the EDC would likely “oversubscribe” DR participants in order to meet its DR commitments. That will further increase the cost of Act 129 DR programs compared to PJM programs.

PPL Electric also agrees with Industrial Customer Groups’ conclusion that “the proposed DR model will likely compete with PJM Interconnection Emergency Load Response Program and may provide additional compensation for load curtailment activities that would be undertaken based on incentives and market signals that are already in place.”¹²

PPL disagrees, however, with the DR Providers’ comment that customers should be permitted to participate simultaneously in the Act 129 DR programs as well as PJM’s ELRP.¹³ PPL Electric does not agree for several reasons. First, dual participation would not provide

¹¹ DR Providers Comments, p. 15.

¹² Industrial Customer Groups Comments, p. 2.

¹³ DR Providers Comments, p.10.

incremental DR reductions compared to participation in one of the programs. Dual participation will merely pay excess incentives (to curtailment service providers or to customers) for a given load reduction event in order for the DR event to “count” toward both programs. Second, if a customer curtails for an Act 129 DR event before PJM calls their event, that customer’s load reduction will not be available for PJM’s event. In addition, participation in the Act 129 event (without participating in the PJM DR) would reduce a customer’s PJM DR baseline for future events, preventing a customer from achieving reductions in future PJM DR events. Conversely, if the customer curtails for the PJM DR event before the Act 129 event, the load reduction will not be available for Act 129.

PPL Electric also disagrees with the Joint Commenters’ comment that “EDC-run programs can be an important tool to mitigate market entry obstacles in the PJM administered DR market. This could include high start-up costs, multi-year deliverability issues, enhancing price certainty for customers when PJM BRA prices fluctuate, etc.”¹⁴ Effectively, the Joint Commenters are recommending competition for DR programs. In other words, the Joint Commenters are advocating that Act 129 DR programs should be designed to be “better than” PJM DR programs to encourage more load reductions than are otherwise provided for in the competitive market. Competitive markets must send clear and unbiased signals to participants, and subsidized Act 129 DR programs interfere with those market signals.

In addition, PPL Electric disagrees with the DR Providers, OCA, and the Amended DR Study, which recommend that residential DLC programs be bid into the PJM BRA. PPL Electric disagrees for the reasons detailed in its Comments and for the additional reasons below.

First, any DR that clears the PJM BRA is obligated to implement load reductions in the PJM ELRP. Therefore, the Act 129 DLC program must also simultaneously participate in the

¹⁴ Joint Commenters Comments, p. 5.

PJM ELRP, which is inconsistent with the recommendation in the Amended DR Study that Act 129 DR programs are not permitted to participate in the PJM ELRP. Furthermore, an Act 129 DLC program subsidized by retail ratepayers would unfairly compete in the PJM BRA against unsubsidized DR programs.

Second, PPL Electric's Phase I DLC program included residential and non-residential customers. Therefore, to the extent that non-residential customers participate in a future DLC program and are eligible to simultaneously participate in PJM ELRP and Act 129 DLC, it would be discriminatory toward non-residential customers in other Act 129 DR programs who are specifically prohibited from participating in other PJM DR programs.

Third, PJM could call ELRP events at times, such as in winter or mild temperatures during summer (*i.e.*, loss of generation or transmission constraints), when there is no air conditioning load (DLC program) to curtail. Therefore, DLC-type load reductions would not be available to relieve PJM's operational problems, and EDCs would be subject to PJM penalties for failure to meet their ELRP commitments.

Fourth, as OCA and PPL Electric noted in their comments, PJM is currently evaluating changes to its demand response programs and forward capacity market rules.¹⁵ The Commission and EDCs have no control over the scope and timing of PJM changes that could significantly impact the design, implementation, and compliance of Act 129 DR programs. Changes in PJM's rules could force an EDC to change its Act 129 DR programs without sufficient lead time for the EDC to revise its EE&C Plan, secure Commission approval, revise CSP contracts, and implement the changes in time to meet DR compliance targets.

¹⁵ OCA Comments, p. 12 n. 4.

In addition, PPL Electric disagrees with the DR Providers comment that Act 129 DR should be targeted at reducing the impact to consumers from capacity constraints.¹⁶ PPL Electric does agree that the purpose of DR is to permanently eliminate or shift end-use load from one period to another, ultimately to reduce the amount of capacity required. However, for the reasons detailed in PPL Electric's Comments, the competitive market, not EDCs, should be responsible for providing the appropriate amount of DR, at the appropriate market price.

D. ALTERNATIVE METHODS TO IMPROVE THE COST-EFFECTIVENESS OF DR PROGRAMS

The Commission's Amended DR Study proposes several changes, such as how DR program benefits and costs are determined/quantified, changes to program rules, the definition of peak hours, etc., and concludes that DR might be cost-effective if these changes are included in future DR programs. Several parties submitted comments about these proposed changes.

1. Avoided Cost of T&D Infrastructure

The Amended DR Study suggests that Act 129 DR reduces the need to build new transmission and distribution ("T&D") facilities and, therefore, recommends including avoided T&D infrastructure as a benefit in the TRC calculation.

PPL Electric disagrees with OCA, the DR Providers, and the Joint Commenters that avoided T&D is important to quantify and should be included as a benefit in the TRC analysis for future Act 129 DR programs. As stated in PPL Electric's Comments, avoided T&D benefits are already reflected in the TRC's avoided cost calculation (T&D rates), are insignificant compared to all of the other factors that influence modifications and enhancements to the T&D system (*i.e.*, replacement of obsolete equipment, improved redundancy, load growth, transmission expansion directed by PJM, etc.), and will be nearly impossible to confirm. In

¹⁶ DR Providers Comments, p. 14.

addition, an EDC has a fiduciary duty to provide safe, adequate and reliable service. It is not prudent for an EDC to rely on voluntary demand response programs, which may not be renewed in the future, when planning for the long-term capacity of its T&D system.

2. PJM Price Suppression

The Amended DR Study assumes that Act 129 DR programs suppress PJM prices and, therefore, recommends including price suppression as a benefit in the TRC calculations. The Amended DR Study also recommends conducting a price suppression study to quantify such benefits.

PPL Electric agrees with Industrial Customer Groups that wholesale price suppression is highly speculative and should be excluded from future Act 129 DR program TRC analysis.¹⁷ PPL Electric disagrees with OCA and the Joint Commenters who favor price suppression benefits. As described in PPL Electric's Comments, price suppression should not be an adder to TRC benefits for the following reasons:

- Some-to-all of the presumed price impacts are already reflected in the forward market prices that are currently components of the TRC avoided cost calculation; and
- Estimates of price suppression would be speculative at best and extremely difficult to quantify and isolate from all of the other factors that influence wholesale prices (such as generation availability, bidding behavior of market participants, supply and demand, fuel prices, etc.). Even if it were possible to estimate price suppression impacts, PJM prices are highly variable and any price suppression conducted in 2014 would not be representative of future results in 2016 - 2021.

¹⁷ Industrial Customer Groups Comments, p. 2.

3. DR Measure Life and Amortization of DR Fixed Costs

The Amended DR Study recommends that EDCs amortize certain fixed/initial costs for DR (such as the initial cost of direct load control devices and special meters for load curtailment measurements) and assign a measure life of 10 years for the TRC calculations. The Amended DR Study concludes that these changes will improve the benefit-cost ratios.

PPL Electric disagrees with OCA and the Amended DR Study that these changes will improve the benefit-cost ratios. The measure life of a DR program should be one year, regardless of the amortization period of fixed (initial) costs and regardless of how long the DR equipment lasts. The measure life is how long savings will persist from that measure. For an energy efficiency measure, such as a heat pump or efficient lighting, the savings will recur “automatically” (with no further incentives, participant costs, actions by the EDC, or EDC program costs) for the life of the equipment. Therefore, the life of the equipment and the measure life for the savings are identical for energy efficiency measures (including the peak load reductions that result from energy efficiency measures).

Furthermore, for an energy efficiency measure, the TRC is conducted only in the year the measure is installed and includes the future stream of recurring benefits over the life of the measure. The TRC benefits include the energy savings for each year the measure will produce savings (*i.e.*, its lifetime savings based on the annual savings for the measure multiplied by its measure life). The TRC cost for an energy efficiency measure is the incremental cost of the measure, which is generally the difference between the cost of the efficient measure and the cost of the standard/baseline measure (usually the difference in the initial price of the equipment and installation). These costs include EDC and participant costs. For example, suppose an LED provides 40 kWh/yr savings, has a measure life of 14 years, and has total TRC cost of \$10 (the incremental cost of the measure regardless of the portion paid by the EDC and the participant).

In that scenario, the TRC is conducted for the program year in which the measure was installed, the TRC benefits would be 40 kWh/yr for 14 years (560 kWh), and the TRC costs would be \$10.

However, for a DR measure (such as DLC), the equipment life may be 5 to 10 years, but the savings stop immediately at the conclusion of each DR event/program year. For DR benefits to recur in subsequent years, the DR measure (such as DLC) must be repeated, including any annual EDC costs, incentives, and participant costs. There is no requirement or assurance that the DR measure or that the participant will “automatically” achieve DR in future years. In fact, the amount of DR (including the number and duration of events) may vary significantly from year to year. Consequently, the TRC analysis must be conducted each year a DR measure is installed, and will be based only on that year’s benefits and costs. Therefore, the measure life for purposes of the TRC and savings persistence is one year for a DR measure. This is analogous to a behavior and education program (home energy reports) where the measure life is one year because the savings stops if the home energy reports stop. For the savings to recur yearly, the home energy reports must be repeated yearly.

Amortization of fixed costs over periods longer than one year will not change the cumulative TRC (over the life of an EE&C Phase). It will merely increase the first year’s TRC benefit-cost ratio and reduce subsequent years’ TRC benefit-cost ratios. In other words, the cumulative TRC benefit-cost ratio (all years) would not materially change compared to amortizing fixed costs over a single year.¹⁸

4. Discontinuing the 100-hour Requirement

The Amended DR Study recommends discontinuing the 100-hour requirement for DR and that any future DR should occur only when needed for reliability or when it is likely to be cost-effective. The Amended DR Study proposes two alternative methods for determining the

¹⁸ There may be some minor differences due to present value impacts.

applicable “trigger” for implementing peak load reductions from Act 129 DR programs. One is based on real-time PJM LMPs that exceed a specified threshold. The other is based on the PJM day-ahead load forecast that exceeds an EDC-specific threshold. Both alternatives would include a maximum number of DR events per year and a maximum number of hours per event.

OCA and the Joint Commenters suggested alternative methods. The Joint Commenters suggested using the PJM day-ahead LMP as the “trigger” for DR events.¹⁹ OCA suggests using both of the “triggers” recommended in the Amended DR Study. PPL Electric does not agree with these alternative methods and prefers the PJM day-ahead load forecast, as described in PPL Electric’s Comments.

The PJM day-ahead LMP “trigger” suggested by the Joint Commenters is problematic. The day-ahead price does not necessarily correlate with the real-time price or the real-time need for DR. Day-ahead prices could be very high and real-time prices low, or vice versa. PJM day-ahead and real-time prices can be high during periods of mild weather and low loads, due to unavailable generation, transmission constraints, or other factors. In that case, any DR that relies on air conditioning (such as DLC programs) may not be possible because the air conditioners are not in operation or are operating infrequently. The Commission would have to determine if an EDC is required to implement DR during the operating day if the day-ahead price exceeds the “trigger,” but the actual price and/or PJM operating conditions in real-time do not warrant DR (below the “trigger”). Similarly, the Commission would have to decide if an EDC is required to implement DR during the operating day if the day-ahead price was below the “trigger,” but the actual price and/or PJM operating conditions warrant DR (above the “trigger”).

The “trigger” suggested by OCA is also problematic. The “trigger” suggested by OCA would require activating DR whenever the day-ahead load forecast exceeds the “trigger” and

¹⁹ Joint Commenters, p. 16.

whenever real-time or day-ahead LMPs exceed the “trigger.” The problem with the day-ahead LMP “trigger” is described above. As described in more detail in PPL Electric’s Comments, the real-time LMP “trigger” lacks sufficient advance notice, is highly volatile (DR would be on/off/on/off), and LMPs could be high during periods of mild weather when DLC is ineffective. In addition, using both the load and price “triggers” would likely increase the number and duration of DR events, significantly increase the cost, and discourage customer participation.

E. DEMAND POTENTIAL STUDY & SCHEDULE FOR SETTING FUTURE DR TARGETS

The DR Providers recommend the Commission approve Phase III DR targets quickly.²⁰ PPL Electric does not agree for several reasons. First, as detailed previously, future DR targets are not permissible because the Phase I DR Programs were not cost-effective.

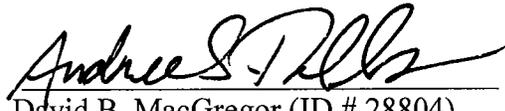
Second, as detailed in PPL Electric’s Comments, any DR targets must have a sound technical basis and must be determined from a DR Market Potential Study. In addition, a DR Market Potential Study must be conducted simultaneously with an Energy Efficiency Market Potential Study because they are highly inter-related. The Act 129 funding budget must be appropriately allocated between energy efficiency and DR programs because doing so is necessary to determine the “program potential” component of market potential and because both energy efficiency measures and DR measures produce peak load reductions.

²⁰ DR Providers Comments, p. 8.

III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests the Commission: (1) exclude DR programs and DR compliance targets from any future Act 129 EE&C Plans; and (2) find that additional Commission studies to determine the viability or to define the scope of future Act 129 DR programs and DR compliance targets are not warranted.

Respectfully submitted,



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Date: January 13, 2014

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