

CITIZEN POWER

Public Policy Research Education and Advocacy

December 23, 2010

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
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 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

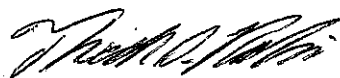
Enclosures

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 comments in response to the proposed 2011 update to the Technical Reference Manual ("TRM").

In general, Citizen Power believes that the proposed TRM meets its goals of providing tools to evaluate standard measures and to facilitate the validation of real energy savings. However, Citizen Power has a concern regarding the demand reduction figures for customers under time-of-use ("TOU") rates or real-time price plans. One of the main benefits of TOU rates is the incentive for customers to shift discretionary electricity usage to off-peak periods. For these customers the unit peak demand reduction for some measures will be less than estimated in the proposed TRM because of the influence of TOU pricing. As an example, the demand coincidence factor for measure 2.2, electric clothes dryer with moisture sensor, is .136 in the proposed TRM. However, this number will undoubtedly be lower for customers who shift their use of their dryer to off-peak periods because of the influence of TOU pricing. As a group, TOU customers will have a lower demand coincidence factor for some measures. The impact of this discretionary behavior will affect measures to the degree that their use can be conveniently shifted to off-peak hours. The overall impact will be an overestimation of the amount of demand savings from certain measures for TOU customers. Citizen Power recommends that the

coincidence factor should be adjusted for the measures that TOU customers are able to shift to non-peak hours in order to account for this known behavior pattern.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Theodore S. Robinson', written in a cursive style.

Theodore S. Robinson, Esquire
Staff Attorney
Citizen Power
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Pittsburgh, PA 15217