

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Authority to Establish an)	Case No. 13-662-EL-UNC
Energy Efficiency Pilot Program for Low)	
Income Customers		

**REPLY COMMENTS OF PEOPLE WORKING COOPERATIVELY TO
COMMENTS FILED BY OHIO PARTNERS FOR AFFORDABLE ENERGY AND
CONCURRENCE IN RECOMMENDATIONS BY THE OFFICE OF THE OHIO
CONSUMERS' COUNSEL**

People Working Cooperatively, Inc. ("PWC") submits these brief Reply Comments to the Comments filed by Ohio Partners for Affordable Energy ("OPAE") with its Motion to Intervene in this case. PWC submits that the OPAE Comments do not raise legitimate concerns.

The first of these OPAE concerns is the "ownership" of the savings that PWC would be permitted to sell to Duke Energy Ohio ("Duke"). Frankly, no one has claimed ownership. While it is true that federal tax revenues fund the Home Weatherization Assistance Program, and the Universal Service Fund rider provides funding for, among other programs, the Electric Partnership Program, it is not true that these funds are earmarked for the purchase of specific measures. Similarly, the purpose of the HWAP and EPP programs is not to deliver measured and verifiable energy efficiency savings available for compliance with the benchmarks established in Senate Bill 221. PWC submits that these are social programs that include many elements, not just the installed weatherization measures. The pilot if approved will permit more value to be extracted from the tax dollars or USF dollars extended for these worthwhile social programs. Thus, the social benefits being "paid for" with these revenues will continue to be provided undiminished. In fact, the social benefits will be enhanced by virtue of the additional qualified beneficiaries that can be served by the leveraged funding PWC is able to attract as a consequence

of these additional Duke-supplied payments.

PWC suggests that OPAE's second premise, that the energy savings will have been "paid for twice" by taxpayers or utility customers, is simply faulty. The "payments" through tax or USF funding facilitates the continuation of these social programs and were not designed to create S.B. 221 energy savings and will not be affected in any way by the proposed pilot.

The underlying concept of Rider EE-PDR is to balance the energy efficiency benefits and costs of included programs. OPAE disregards the energy efficiency benefits, focusing only on the costs. This is inappropriate and unwise. At the same time, OPAE acknowledges that its low income constituency will benefit from the additional weatherization measures PWC installs utilizing the incremental leveraged funds can raise based on its receipt of the proposed energy savings payments.

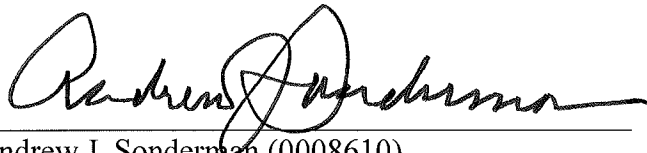
PWC notes that the Office of the Ohio Consumers' Counsel ("OCC") filed a Motion to Intervene with Memorandum in Support yesterday, April 30. In the Memorandum in Support, OCC suggested that there should be a \$2 million cap on the pilot program over its three year life; it further recommended that the pilot program be evaluated in the Duke Energy Efficiency Collaborative as the third year of the pilot program draws to a close to consider whether the program should continue thereafter, upon Commission order authorizing continuation. Finally, OCC notes that given these conditions and the nature of the pilot proposed, the Commission could "allow implementation of the pilot program now without additional process prior to implementation". (OCC Memorandum in Support, p. 4).

PWC believes that the conditions recommended by OCC are reasonable, and that with these conditions and the nature of the three year pilot there is no need for additional process in this proceeding prior to implementation.

Moreover, the funding represented by the payments that would be authorized through this pilot program is critical to PWC in continuing and expanding its “whole house” weatherization programs to qualified low income recipients.

For all of the above reasons, People Working Cooperatively, Inc. request that the Application submitted by Duke Energy Ohio in this case be approved forthwith.

Respectfully submitted on behalf of
PEOPLE WORKING COOPERATIVELY, INC.

A handwritten signature in black ink, appearing to read "Andrew J. Sonderrman", written over a horizontal line.

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CERTIFICATE OF SERVICE

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Summary: Response Reply Comments of PWC to Comments Filed by Ohio Partners for Affordable Energy electronically filed by Mr. Andrew J Sonderman on behalf of People Working Cooperatively, inc.