

PENNSYLVANIA PUBLIC UTILITIES COMMISSION (PUC) RECEIVED
Pennsylvania Annual Resource Planning Report
52 Pa. Code §§ 57.141-57.154 Docket No. L-00980136 2000 JAN 13 PM 3: 04
Final Rulemaking Order Comments

INDEPENDENT REGULATORY
 REVIEW COMMISSION

Section 57.142 (a)(b)(c)

This section is somewhat inconsistent in terminology.

Subsection (a) asks for a forecast of energy demand in Mwh,
 Subsection (b) asks for a forecast of "connected" peak load, and
 Subsection (c) asks for a forecast of "connected" customers.

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The PUC should be consistent in specifying the basis for reporting under Subsection (a), (b), and (c).

Section 57.142 (d)

This Subsection asks for an aggregate forecast for the Electric Distribution Company's (EDC) control area. The PUC should clarify the distinction between the EDC connected load forecast and the EDC control area forecast.

It is apparent in several references in the order and from the general tone of the comments that the PUC expects each EDC to report aggregate forecasts of energy demand and peak load for the appropriate regional reliability council. This is an inefficient (they will get multiple copies of the reliability council forecasts) and possibly error prone (the copies may not all agree) method of getting the aggregated forecasts. It also makes the EDC responsible for reporting a forecast for an entity to which the EDC provides input, but does not control timing, methodology, or results. The PUC should get the required aggregate information from the respective regional reliability council reports, rather than have each company submit redundant information. The PUC gets assessment information from the GRP 57 Report, GRP 33 Report, and the GRP 33A Report. If electric service reliability is assessed from a regional perspective, the respective regional reliability council should supply it.

Section 57.143 (a)

With respect to generation, the EDC should only be required to report on Provider of Last Resort (PLR) resources. As PLR service is under the jurisdiction of the PUC, the PUC has a right and responsibility to monitor resource planning to assure reliable service. Allegheny Power reads and interprets references to generation within the rules to apply only to the PLR generation portfolio.

Section 57.152

We have not been able to locate copies of the proposed forms making it impossible to comment.

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NO. OF PAGES 2 *(incl. cover)*

DATE: 1-13-2000

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