

Weatherization Works!



April 27, 2015

Pennsylvania Public Utility Commission
Attention: Secretary
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265.

**RE: Act 129 Energy Efficiency and Conservation Program Phase III
Docket Number M-2014-2424864**

Dear Secretary Chiavetta:

The PA Weatherization Task Force is a network of 38 non-profit weatherization providers across the Commonwealth. These providers have delivered weatherization services to low-income residents for more than 30 years with a proven track record weatherizing the homes of the most vulnerable residents of this Commonwealth. Over the past 30 years, this network has weatherized nearly 500,000 homes across the Commonwealth.

The PA Weatherization Task Force firmly supports the continuation and a third phase of the energy efficiency and conservation programs, and would like to submit the following comments on specific enumerated issues and topics in response to the March 11, 2015 Tentative Implementation Order (Order).

Demand Reduction

The PA Weatherization Task Force supports the inclusion of demand response in Phase III of Act 129. Demand response has proven to achieve meaningful reductions in electricity costs for all customers. These programs reduce capacity and energy costs during the most expensive hours thereby reducing costs for all ratepayers with these savings being vitally important to low income residents of the Commonwealth.

Inclusion of a Reduction Target Carve-out for the Government, Educational and Non-Profit Sector

The PA Weatherization Task Force supports the inclusion of a G/E/NP reduction carve-out. Further, the Task Force particularly supports the continuation of an emphasis placed on multifamily housing. Eligibility under this component would be for low-income, elderly, and handicapped residents of the Commonwealth in multifamily housing owned by non-profit or government entities. And we would propose that PHFA continue to be utilized as a partner in this endeavor because of the Agency's ongoing work in this sector.

Inclusion of a Low-Income Sector Carve-Out

The PA Weatherization Task Force supports the proposed 5.5% low-income sector carve-out; Act 129 specifically sets forth this requirement and a low-income specific carve out should continue. However, the Task Force proposes that the carve out consist of only direct services provided to confirmed low-income customers and not from counting residential customers who have received soft measures such as energy education or rebates and who by virtue of a telephone survey are determined to be low-income. We support the increase in the percentage of this carve out but propose that these savings be from direct measures provided to low-income customers. We join the Commission in its movement towards shifting the focus for the low-income sector to directly installed measures that are more verifiable and are a better investment of the low-income program dollars.

Assuming this carve out will continue, the Task Force strongly supports a requirement to include low-income households at or below 250% of the Federal Poverty income Guidelines. Act 129 does not preclude this expansion and the Task Force supports a low-income sector carve-out structure, which is proportionate to those households' share of total energy usage (at 250% of the Federal Poverty income Guidelines).

Finally, the Task Force strongly supports the continuation and inclusion of a measure that will ensure that the Low-Income Sector Carve-Out is in addition to LIURP funding, as required in Act 129.

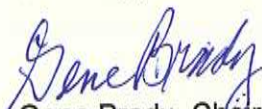
Accumulated Savings Carry Over

The Task Force opposes awarding credit in Phase III to an EDC that achieves more than its targeted reduction in its Phase II EE Program. In the case of an EDC that has met its Phase II EE target but has not spent its entire Phase II budget, the Task Force supports reconciling the remainder of its Phase II budget to ratepayers in order to help lower customers' utility bills.

The PA Weatherization Task Force respectfully requests that the Pennsylvania Public Utility Commission enter these Comments into the record.

Thank you for the opportunity to comment on this matter. Please feel free to contact me directly if you have any questions or need any additional information.

Sincerely,



Gene Brady, Chairman
PA Weatherization Task Force

cc: Megan Goode (via email)