



1315 Walnut Street, Suite 1600 | Philadelphia, PA 19107  
www.pacdc.org PHONE 215.732.5829 FAX 215.732.5725

*Supporting CDCs. Strengthening Neighborhoods.*

October 15, 2010

TO: Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

FR: Rick Sauer, Executive Director  
Philadelphia Association of Community Development Corporations  
1315 Walnut Street – Suite 1600  
Philadelphia, PA 19107

RE: PACDC Comments

Enclosed are comments from the Philadelphia Association of Community Development Corporations (PACDC).

Please use the enclosed, self-addressed, stamped envelope to send us your stamped, confirming receipt of these comments.

Thank you very much.

**RECEIVED**

OCT 15 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for :  
Approval of its Revised Energy : Docket No. M-2009-2093215  
Efficiency & Conservation Plan :

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COMMENTS OF THE PHILADELPHIA ASSOCIATION  
OF COMMUNITY DEVELOPMENT CORPORATIONS

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**RECEIVED**

OCT 15 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Rick Sauer, Executive Director  
Philadelphia Association of Community  
Development Corporations  
1315 Walnut Street, Suite 1600  
Philadelphia PA 19107  
Phone: 215.732.5829  
Fax: 215.732.5725

Dated: October 15, 2010

## INTRODUCTION

This proceeding concerns amendments proposed by PECO Energy Company (“PECO” or “company”) to its Act 129 Energy Efficiency and Conservation (“EE&C”) plan pursuant to the requirements of Act 129 of 2008, P.L. 1492 (“Act 129”), 66 Pa.C.S. §§2806.1-2806.2.

These comments are submitted by the Philadelphia Association of Community Development Corporations (“PACDC”) as an interested stakeholder pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) invitation for interested parties to comment upon each electric distribution company’s (“EDCs”) revised EE&C plans.<sup>1</sup>

PACDC’s interest in this proceeding derives from the impact the proposed amendments will have upon low-income customers and owners and operators of low-income housing residing in PECO’s service territory.

PACDC is dedicated to advocacy, policy development and technical assistance for community development corporations and other organizations in their efforts to rebuild communities and revitalize neighborhoods. Many of our members are managers and developers of affordable multi-family housing who are strongly invested in increasing energy efficiency of their properties. In addition, PACDC is a member of the Philadelphia Weatherization and Conservation Collaborative (“PWCC”), which has been working to identify and remove obstacles to increased energy efficiency in multi-family affordable housing.

Through the work of the PWCC, PECO has initiated a pilot project with Project H.O.M.E., a nationally recognized nonprofit organization that operates a variety of affordable housing properties in Philadelphia. PECO also has committed to working with PWCC to

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<sup>1</sup> See Secretarial Letter Re: Proposals to Change Energy Efficiency and Conservation Plans Approved by the Commission Pursuant to Act 129 of 2008, Docket Nos. M-2009-2093217, M-2009-2092222, M-2009-2112952, M-2009-2112956, M-2009-2093215, M-2009-2093216, and M-2009-2093218, Sept. 1, 2010; Implementation Order Re: Energy Efficiency and Conservation Program, Docket No. M-2008-2069887, (Order entered Jan. 16, 2009), at 24.

develop approaches to whole neighborhoods for weatherization, thereby effectively aggregating demand for conservation services. PACDC and PWCC are both appreciative of the work that PECO has performed thus far and looking forward to future partnerships.

PACDC thanks the Commission for this opportunity to provide these comments.

### **COMMENTS**

PACDC strongly encourages PECO to include within its revised EE&C plans specific measures targeted to multi-family properties providing affordable housing to low-income families. As it currently reads, PECO's revised EE&C plan makes no explicit commitment to target multi-family affordable housing. However, PECO has in practice targeted resources to these kinds of projects.

Targeting affordable multi-family properties makes excellent sense because it provides an opportunity for PECO to accrue significant energy savings from a single project, while helping preserve affordable housing for low-income families. Targeting affordable multi-family properties would also help PECO meet Act 129's mandate to coordinate its low-income Act 129 activities with other programs administered by the Commission or another federal or state agency.<sup>2</sup> Specifically, projects such as the pilot with Project H.O.M.E. address the need and difficulty of combining Act 129 funds and funds from the Department of Energy's Weatherization Assistance Program.

Because multi-family affordable housing projects have the potential for significant energy savings and also help to preserve affordable housing in the region, they should be an important component of PECO's revised EE&C plans.

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<sup>2</sup> 66 Pa.C.S. § 2806.1(b)(1)(G).

**CONCLUSION**

In conclusion, PACDC thanks the Commission for the opportunity to submit these comments and encourages the Commission to continue its efforts to ensure low-income families receive satisfactory levels of service through the Act 129 EE&C plans.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Sauer", is written over a solid horizontal line.

Rick Sauer

Philadelphia Association of Community  
Development Corporations  
1315 Walnut Street, Suite 1600  
Philadelphia PA 19107  
Phone: 215.732.5829  
Fax: 215.732.5725

Dated: October 15, 2010

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404