

# Weatherization Works!



December 19, 2014

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, many of whom have delivered weatherization services to low-income residents for more than 30 years. The existing network of weatherization providers has 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 October 23, 2014 Secretarial Letter.

## **2. Inclusion of a Peak Demand Reduction Requirements**

*The PA Weatherization Task Force supports peak demand reduction targets and demand response programs. These programs reduce capacity and energy costs during the most expensive hours thereby reducing costs for all ratepayers. And these savings are vitally important to low income residents of the Commonwealth.*

## **3. 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.*

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**PENNSYLVANIA WEATHERIZATION TASK FORCE**

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#### **4. Inclusion of a Low-Income Sector Carve-Out**

*The PA Weatherization Task Force strongly believes that the low-income sector carve-out should be included in the next EE&C Plan. Act 129 specifically sets forth this requirement and this specific carve out should continue.*

*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).*

*Further, the Task Force recommends that only direct services provided to confirmed low-income customers be counted towards the low-income carve-out target. Currently, a good portion of low-income savings are obtained 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 propose that only savings from direct measures provided to low-income customers be counted towards the low-income carve-out.*

*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.*

#### **7.a. Accumulated Savings Carry Over**

*The Task Force opposes awarding credit in Phase III to an EDC that achieves more than its 3% 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 to the Secretarial Letter into the record. We look forward to participating in the process as it moves forward.

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)  
Kriss Brown (via email)

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