



December 31, 2015

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

**Re: PPL Electric Utilities Petition for Approval of its Act 129 Phase III EE&C Plan,
Docket No. M-2015-2515642**

*Letter in Lieu of Comments of The Coalition for Affordable Utility Services and
Energy Efficiency in Pennsylvania (CAUSE-PA)*

Dear Secretary Chiavetta,

On November 30, 2015, PPL Electric Utilities Corporation (PPL) filed a Petition for Approval of its Phase III Energy Efficiency and Conservation Plan (Plan) with the Pennsylvania Public Utility Commission (Commission) in compliance with 66 Pa. C.S. § 2806.1(b) (relating to energy efficiency and conservation programs) and in accordance with the Commission's Phase III Energy Efficiency and Conservation Program Implementation Order, entered June 19, 2015, at Docket No. M-2014-2424864 (Phase III Implementation Order).

On December 9, 2015, the Commission served Notice on CAUSE-PA which assigned PPL's Petition to Administrative Law Judge Susan D. Colwell for hearings and referral to the Commission for a decision. The Notice further scheduled a Prehearing Conference for January 5, 2016, at 10:00 am, at which time it is expected that a schedule will be adopted for the exchange of evidence and testimony by all parties to the proceeding.

On December 12, 2015, the Commission published a Notice of PPL's Plan in the Pennsylvania Bulletin, which directed that "responsive pleadings, along with comments and recommendations are to be filed with the Commission within 20 days" of the published notice. 45 Pa.B. 7078.

On December 17, 2015, CAUSE-PA filed a Petition to Intervene in the litigated proceeding. And, on December 18, 2015, ALJ Colwell issued a Prehearing Order requiring parties to, among other things, file a Prehearing Memorandum listing the issues and sub-issues each party intends to raise in the course of the proceeding.

In compliance with ALJ Colwell's December 18 Prehearing Order, CAUSE-PA filed its Prehearing Memorandum with the Commission concurrently with the filing of this Letter. In its Prehearing Memorandum, CAUSE-PA notes that the primary issue it intends to raise in this proceeding is *whether PPL's proposed Plan appropriately targets the low income sector in compliance with Act 129 and the Phase III Implementation Order.*¹ To fully address this overarching issue, CAUSE-PA further noted its intent to raise the following sub-issues:

- Whether the low income population will obtain a share of the total energy savings that is in accord with Act 129 and the Commission's Implementation Order.
- Whether PPL's proposed low income sector programs and identified measures within those programs comport with the requirements of Act 129 and Commission Orders.
- Whether PPL's proposed low income sector programs provide for measures that have long-lasting savings that will positively impact the high energy burden borne by low-income customers.
- Whether PPL's proposed low income sector programs adequately focus on direct installation as required by the Commission's Implementation Order.
- Whether the delivery of measures to the low income population is appropriately coordinated with other low income bill assistance and energy efficiency and conservation programming which operate within the PPL service territory.
- Whether PPL's EE&C Plan appropriately leverages its Act 129 Smart Meter rollout to promote and execute programming in a least cost manner.
- Whether the proposed multifamily building component of PPL's Plan is sufficiently calibrated to reach the low income population which resides in multifamily buildings.

CAUSE-PA reserved the right to raise additional sub-issues that may arise throughout the course of the litigated proceeding.

¹ In its Phase III Implementation Order, the Commission declared the following with regard to the low-income offerings of each of the EDCs:

The Commission . . . will retain the 5.5% low-income savings target for the EDCs with the following modification. Savings counted towards the 5.5% target **may only come from specific low-income programs or low-income verified participants in multifamily housing programs.** Savings from non-low-income programs will not be counted for compliance.

The Commission believes that low-income savings should primarily come from measures that are directly provided to low-income households. Thus far in Phase II, a substantial portion of the low-income savings is coming from the contribution of low-income customers who are identified during random surveys as participants in upstream lighting programs. While the low-income savings are verified by a SWE-approved evaluation method, there are shortcomings in this method. Random customers are asked a series of questions that allow them to self-identify their income levels and number of household occupants, but there is no further verification of their low-income status. It was the Commission's intent to allow savings to be counted from the upstream lighting programs because it was reasonable to believe that there would be some low-income customers who would participate. It was not, however, the Commission's intent to have that program be the primary contributor in meeting the low-income carve-out.

Energy and Conservation Program, Implementation Order, Docket No. M-2014-242864, at 69-70 (June 19, 2015) (emphasis added).

Because the Notice filed in the Pennsylvania Bulletin requires the filing of comments or responsive pleadings within 20 days of its publication, CAUSE-PA is filing this *Letter in Lieu of Comments* to inform the Commission of its intent to fully participate in the captioned proceeding through the filing of testimony, direct evidence, and briefing. CAUSE-PA will not be filing comments separately from the testimony of its witness.

Respectfully submitted,
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December 31, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this day I have served copies of the **Letter in Lieu of Comments of CAUSE-PA** as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL and/or FIRST CLASS MAIL

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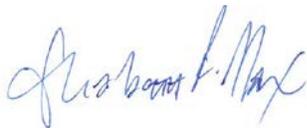
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