

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation – Petition :  
For Approval of Act 129 Phase III Energy :       Docket No. M-2015-2515642  
Efficiency & Conservation Plan                       :

**COMMISSION ON ECONOMIC OPPORTUNITY'S**  
**STATEMENT IN SUPPORT OF JOINT PETITION**  
**FOR APPROVAL OF PARTIAL SETTLEMENT**

NOW COMES the Intervenor, the Commission on Economic Opportunity (CEO) and files this statement in support of the Joint Petition for Approval of Partial Settlement in the above-captioned matter and agrees to its terms based upon the following:

1. CEO is a not-for-profit Pennsylvania corporation and an advocate for its clients - the low-income population of Luzerne County.
2. CEO intervened in the above-captioned matter to address the low-income portion of the Company's Act 129 Phase III (Plan).
3. CEO participated fully in the Company's Stakeholder process and attended stakeholder meetings held during the months of July, August, September and October 2015.
4. CEO learned during that stakeholder process, and the Company has so indicated in its Plan, that it will use a single Conservation Service Provider to deliver the low-income portion of the Plan. This approach was not part of the Company's Phase I and II plans or low-income programs; in those earlier phases the Company used in many instances community-based organizations (CBO) to deliver its low-income program.

5. CEO was one of those CBOs used by the Company to deliver its low-income programs (low-income WRAP) in Phases I and II in the Luzerne County portion of the Company's territory.

6. CEO also administered the Company's Operation Help, OnTrack, and Security Deposit Waiver programs in Luzerne County as well as operating PPL's regular LIURP program and has done so since each of those programs began. Additionally, CEO has been operating the Department of Energy (DOE) funded Weatherization Assistance Program (WAP) in Luzerne County since its inception in 1977.

7. The Company has expressed in its Plan and its testimony that coordination of its low-income WRAP and LIURP WRAP will maximize the effectiveness of those measures (Plan p. 64); that the Plan's programs "...are designed to leverage existing market delivery channels to provide efficient and simple implementation from the customer's perspective" (PPL Stmt. No. 1, Peter Cleff, p. 8); and that it "believes that existing companies and CBOs would be useful in Phase III based upon their understanding of PPL Electric's low-income programs, their experience in PPL Electric's service territory, and their quality work in Phase II." (PPL Stmt. No. 1-R, Peter Cleff, p. 28).

8. However, the Company has offered testimony that the low-income CSP will be responsible for hiring sub-contractors to deliver low-income WRAP and that those sub-contractors may or may not be the CBOs who have traditionally delivered that Act 129 program. (Id.).

9. Although CEO believes that CBOs should be used as they were in Phases I and II, CEO supports the partial settlement because the Company has acknowledged in the settlement that it believes that a sub-contractor's "experience in: (1) providing LIURP WRAP and Low-

Income WRAP; (2) providing measures under the Department of Energy's Weatherization Assistance Program; and (3) working with the Company's low-income customers in their respective regions should be considered in the bid process" used by the low-income CSP. (Joint Petition for Partial Settlement para. 47).

10. In addition to the above, CEO believes that the settlement is in the public interest.

11. Based upon the above, CEO supports the Joint Petition for Approval of Partial Settlement.

Respectfully submitted,

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JOSEPH L. VULLO, ESQUIRE

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**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of Commission On Economic Opportunity's Statement in Support of Joint Petition for Approval of Partial Settlement dated February 16, 2016 upon the following participants this 16<sup>th</sup> day of February, 2016, via first-class mail and electronic mail:

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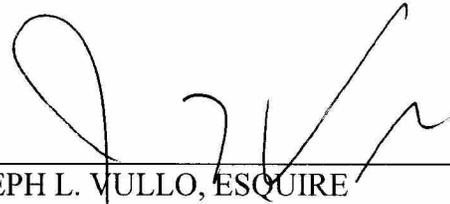
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A handwritten signature in black ink, appearing to read 'J. Vullo', is written over a horizontal line.

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