

Pennsylvania PUC

SEP 2 3 2020

Consumer Services
CAC Division

September 15, 2020

Joe Magee, Energy Policy Manager Bureau of Consumer Affairs Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, Harrisburg, PA 17120

Dear Manager Magee,

I am founder and owner of Solaire Energy, a woman-owned, community-based contractor for the PPL WRAP Program for twenty-five years, since 1995. My company installs LIURP measures for PPL's low-income customers such as insulation, weatherstrip, door and window measures, water heater and appliance replacements. We perform energy audits and energy saving measures for three public utilities in central Pennsylvania. I employ 8 people, and 5 of us are certified BPI Building Analysts with the Building Performance Institute.

I am writing to bring to the PA PUC's attention that PPL has not allowed us to work in low-income homes since late March because of the COVID-19 pandemic, although we have safely returned to work for two other LIURP utilities that we contract with, using approved COVID safety practices that follow CDC, OSHA and State guidelines. This has been frustrating for us as well as low-income customers, as PPL has been unable for months to tell us what the prospects are for resuming weatherization work. The downturn in our business has caused hardship for our company, as we are financially unable to replace trained personnel that we lost during quarantine, and uncertain about our future. Our other contracts have enabled us to survive so far, but we still have one key employee on layoff status, and I have not been able to draw any salary since our PPP loan expired mid-June. I have done this sacrificially to keep our small business going with the loss of WRAP work. We are a small, close-knit business with 60 years of combined experience serving PPL's LIURP program. We have done our best to maintain health insurance for our employees, although we have are now having to rely on limited grant money to do so.

PPL's reticence to resume their LIURP program does not seem reasonable, and deprives their low-income customers of the opportunity to receive important energy-saving measures intended by the program. In this time of financial challenge for everyone, it doesn't make sense to unduly delay the assistance the program affords this vulnerable population. The longer this situation continues, the higher their arrearages grow, leading to possibly long-term safety and security concerns for these customers that include the elderly and disabled. Recently we were told this was because of safety concerns during the pandemic. The other utilities we work for led safety discussions and gave guidance about how contractors were to proceed with this important field work safely, and asked for our feedback and commitment to follow guidelines. PPL did not give us this opportunity.

As background, we were notified on March 16, 2020 that all WRAP field work was suspended until further notice. On June 3, 2020 we were told that our WRAP work could resume effective June 5 when our counties entered the green phase, as long as we followed PA State guidelines for COVID safety. The very next day we were told that permission was cancelled, and no reason was given. A month went by with absolutely no communication, and when I emailed our program director on July 8, I was told there was no information to share, and again no reason was given. It was not until Aug. 31 that I received an email stating that PPL has decided to change their program to an "enhanced" future program, and that customers will only be receiving "remote" services for the foreseeable future. The remote services are phone surveys that are not substantive in nature. They do not provide the customers meaningful energy savings, nor do they provide contractors with the meaningful work agreed upon in our contracts. It is profoundly disappointing that a company like PPL that has always prized customer service and partnered so well with community-based organizations, seems to have taken advantage of the pandemic to halt the program and change course. This has been to the detriment of their low-income customers, the communities they reside in that continue to fund WRAP through rate revenues, and many dedicated, local LIURP contractors.

Despite the interruption of LIURP to low-income customers, PPL has continued to encourage a rebate program providing the same services to higher income customers. I understand this program has been advertised during the pandemic, and as participating contractors we were never notified of any concern on PPL's part about continuing this program.

I urgently request that the PA PUC look into this important matter that places low-income customers, our businesses and employees in jeopardy. Thank you for your consideration.

Respectfully,

Pamela Denlinger
President, Solaire Energy, Inc.



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