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September 22, 2020

M-2016-2554787

The Honorable Gladys Dutrieuille, Chair  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North St.  
Harrisburg, PA 17120

Dear Chairperson Dutrieuille,

I am writing to support SEDA-Council of Governments (SEDA-COG) in its efforts to ask for your assistance to ensure PPL Electric Utilities provides its mandated Winter Relief Assistance Program (WRAP) to low-income families as it has been traditionally delivered. We also do not support the proposed change of service PPL plans to submit this month to the PUC.

SEDA-COG is contracted by PPL to provide Low Income Usage Reduction Program (LIURP) services to reduce low-income families' electric bills. WRAP helps PPL Electric Utilities' customers with limited incomes reduce their home energy use and lower their electric bills. Services include a WRAP energy audit and may include energy education, the installation of energy-efficient appliances, and home weatherization measures from local agencies. Since it was founded in 1985, the WRAP program has helped more than 80,000 individuals and families.

If the PUC approves the change, **it could cripple families** struggling to survive by only appearing to cause energy savings and would ripple throughout our local communities, **siphoning business from an already suffocated local economy** by taking work from local contractors and supply sales from local businesses.

PPL would use one Customer Service Provider or CSP, much like they did for the Act 129 Program in 2016. The CSP that was awarded the 2016 contract was only required to track what they predicted the customer would save through their energy efforts (deemed savings), whereas the WRAP Program now tracks actual savings of the measures local contractors install. If the PUC approves PPL's proposed change, based on past precedent, it could harm low-income families because it doesn't ensure actual savings.

CSPs are large companies and none are in PPL's 28 counties. This means that all the money collected from PPL Utilities' customers to fund these services would be sent out of the region and possibly state to a CSP which would take its administration expenses and profit margins and then return the remainder to

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assist low-income constituents. Currently, 100% of the money collected from PPL's customers stays in our communities to serve low-income residents, create family sustaining jobs, and produce economic multipliers through purchases of material at local building supply stores.

Additionally, PPL is the only public electric utility in the state to still not allow home visits due to the COVID-19 pandemic. PPL has not specified their safety concerns for months, as SEDA-COG has requested, so they may comply. Instead, PPL is only allowing virtual energy audits which do not provide nearly the savings or services as in-home audits. Virtual audits prohibit installation of energy-efficient appliances and weatherization measures, whereas in-home audits require installations. Additionally, a failing refrigerator can't be tested virtually, nor can a

leaking water heater or broken air conditioner be replaced virtually. Further, virtual audits are only possible when the customer has high-speed internet, creating a digital divide.

Because of this, I ask the PUC to direct PPL to do the following:

1. Engage with its contractors to develop safety protocols to allow for the resumption of work supporting low-income citizens in these trying times, just like other utilities across the state and the State Weatherization Program. Low-income families do not deserve this blow, especially during a pandemic that is crushing to many financially.
2. Honor its contracts and not seek to fundamentally change its program with no notice to plan and void contracts with people/agencies who have worked with them for decades.
3. Maintain the service-delivery model which uses community-based contractors who assist their neighbors and have a stake in their communities to ensure low-income Pennsylvanians are served.
4. Maintain the use of actual savings which are measurable as the criteria to assess the success and value of LIURP services. Do not permit use of deemed savings as measurement criteria as it is too vague and subject to manipulation.

I appreciate the PUC's leadership and support for low-income Pennsylvanians in these challenging economic times that are greatly exacerbated by the COVID-19 pandemic.

I welcome the Commission's leadership in bringing PPL and its contractors together to resume energy conservation measures benefiting low-income families.

Sincerely,



Scott Conklin

Centre County State Representative

cc: Tor Michaels, Chief of Staff