

The Honorable David Sweet, Vice Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Dear Vice Chairman Sweet,

My business, Rovegnos's of Carlisle, Inc. is a local community based energy efficiency and conservation business. We have been a LIURP installer for low income customers for PPL Electric Utilities Corporation for over 30 years.

PPL, and all other public Utilities, suspended field work for LIURP customers in March in response to the COVID-19 pandemic. Shortly after the suspension other Utilities (we are also a LIURP contractor for West Penn Power) reached out to their contractors. Working as a team, the Utilities and contractors developed protocols using CDC, OSHA and State Department of Health guidelines to resume field operations to assist low income Pennsylvanians lower their electric bills in these economically challenging times. This in home work accounts for the overwhelming majority of electric usage savings. In June and July other major Utilities ended their moratorium on LIURP field work. Their contractors (including us) have proven that those services **are being delivered safely and responsibly**. Those Utilities LIURP customers have expressed gratitude for receiving LIURP in-home services. In contrast PPL continues its moratorium. Many of the PPL LIURP customers which we were scheduled to serve have inquired as to when they will get the work done to help lower their bills.

Some of the work we provide includes, but is not limited to:

- Insulation in attics, sidewalls and basements
- Blower door testing and air sealing
- Hot water heater replacement
- Refrigerator replacement
- LED light bulbs and power saver strips

Together these measures, suspended now for months, would have significantly reduced the now increased arrearages that low income customers are facing in extremely difficult economic times.

Through these many months never once has PPL reached out to its contractors to engage in a collaborative process to develop safety protocols. This is even as senior management officials repeatedly stated that the continuing suspension of field work is strictly informed by PPL's concern for "safety". When we asked for specificity as to what the safety issues were PPL did not respond. After all the other Utilities contractors (including us for those Utilities we contract with) have been back in the field safely and responsibly for weeks we reached out to PPL to engage them in a discussion to resume field work. We were rebuffed. This has been extremely frustrating as PPL for decades, has, at stakeholders meetings and in correspondence, consistently stated how it values collaboration and teamwork.

As previously noted these services **are being delivered safely and responsibly** all across the Commonwealth. There is no prescription or order from any governing authority whether Federal, State, County, Municipal or the PUC preventing PPL from providing LIURP services and honoring its contracts with us. Therefore it is simply PPL's unilateral decision not to provide the full range of LIURP services and honor the contracts it signed with all of us. Additionally we note that PPL has continued to collect in customer rates the revenues to completely fund the full range of LIURP services.

We note that even as PPL refused to permit in home work for low income customers a great incongruity exists in PPL Utilities "safety" concerns. That is PPL continued to market, both on its website and on television ads, rebates for in-home energy conservation work for more affluent customers. This is the exact same work that PPL continues to direct us not to provide to LIURP customers.

In these past months what have I been doing? I have been financing the myriad materials, vehicles and equipment to service a multi-year contract that PPL signed with me. More importantly however I have been paying for the healthcare of four employees, and their families, who have served PPL Utilities for decades. This is especially critical as, for example, one of their wives is diabetic and has heart issues requiring substantial prescription medications. I have provided, as best I can, personal funds to assist them make up for their loss of income. I try, as best I can, to alleviate their anxiety as it is simply not easy to "just make the best decisions they can for their families with the information we provide" (This was said by a senior management person at PPL).

On August 31st we received this in an email from PPL Utilities:

"The suspension has afforded us time to identify opportunities to both streamline and update the program to better meet the needs of customers. As a result, due diligence is currently underway to develop an enhanced program for the future."

In my opinion this was the objective all along. It is certainly PPL's right to petition the PUC to change its LIURP program in the future. That said to attempt to do so, early in multi-year contracts it entered with us, with no notice or time for us and our employees, who have served PPL well, to secure alternate means to provide for their families, in the midst of extremely challenging economic times, is in my opinion, unconscionable.

My fellow contractors and I ask for your assistance in hosting a meeting with PPL and its community based contractors. The objective we have at such a meeting is to reach a resolution to PPL's concerns and permit us to resume assisting LIURP customers in these times when they most need our service. I am available to answer any questions and provide additional information and documentation if requested. Thank you for your time and consideration.

Sincerely,


Rick Rovegno
President

CC on behalf of my fellow concerned contractors:

Community Action Committee of the Lehigh Valley – Alan Jennings, Executive Director

Green Kite, Inc. – Daniel Rodichok, President

MT Construction, Inc. -- Matt Tenny, President

Progressive Conservation LLC – Kip Adams, President

Rovegno's of Carlisle – Rick Rovegno, President

SEDA Council of Governemnts – Michael Fisher, Assistant Executive Director

Solair Energy, Inc. – Pamela Denlinger, President