

# PENNSYLVANIA UTILITY LAW PROJECT

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October 18, 2010

## Via E-Filing

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

**Re: Petition of PECO Energy Company for Approval of its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of its Compact Fluorescent Lamp Program**

**Docket No. M-2009-2093215**


Dear Secretary Chiavetta:

Please accept for re-filing in the above captioned proceeding the following Comments of Pennsylvania Communities Organizing for Change ("PCOC"). This re-filing is intended to correct an e-filing rejection associated with an e-filing of PCOC Comments made on October 15, 2010. This re-filing is made pursuant to instructions received from the Pennsylvania Public Utility Commission's Secretary's Bureau in an e-mail dated October 18, 2010.

All parties to this proceeding received notice of these Comments during the original filing. Notice was made by first class and electronic mail.

Thank you for your assistance, and please feel free to contact me directly should you have any questions.

Very truly yours,



Julie George, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for** :  
**Approval of its Revised Energy** : **Docket No. M-2009-2093215**  
**Efficiency & Conservation Plan** :

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COMMENTS OF PENNSYLVANIA COMMUNITIES  
ORGANIZING FOR CHANGE ("PCOC")

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Dated: October 15, 2010

## INTRODUCTION

This proceeding concerns amendments proposed by PECO Energy Company (“PECO” or “company”) to its Act 129 Energy Efficiency and Conservation (“EE&C”) plan pursuant to the requirements of Act 129 of 2008, P.L. 1492 (“Act 129”), 66 Pa.C.S. §§2806.1-2806.2.

These comments are submitted by Pennsylvania Communities Organizing for Change (“PCOC”) as an interested stakeholder pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) invitation for interested parties to comment upon each electric distribution company’s (“EDCs”) revised EE&C plans.<sup>1</sup> PCOC’s interest in this proceeding derives from the impact the proposed amendments will have upon low-income customers residing in PECO’s service territory.

Pennsylvania Communities Organizing for Change is comprised of low and moderate income Pennsylvanians working to build power through organizing communities to win changes on the issues that are important to them. PCOC thanks the Commission for this opportunity to provide these comments.

## COMMENTS

### (1) Multi-family Properties:

PCOC strongly encourages companies to include within their revised EE&C plans specific measures targeted to multi-family properties providing affordable housing to low-income families. As it currently reads, PECO’s revised EE&C plan makes no explicit commitment to target multi-family affordable housing. However, PECO has in practice targeted

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<sup>1</sup> See Secretarial Letter Re:Proposals to Change Energy Efficiency and Conservation Plans Approved by the Commission Pursuant to Act 129 of 2008, Docket Nos. M-2009-2093217, M-2009-2092222, M-2009-2112952, M-2009-2112956, M-2009-2093215, M-2009-2093216, and M-2009-2093218, Sept. 1, 2010; Implementation Order Re: Energy Efficiency and Conservation Program, Docket No. M-2008-2069887, (Order entered Jan. 16, 2009), at 24.

resources to these kinds of projects. While it would be helpful for PECO's multi-family initiatives to become a formal part of the EE&C plan, PCOC fully supports PECO's targeting multi-family affordable housing for weatherization services.

PECO is currently working with the Philadelphia Weatherization and Conservation Collaborative ("PWCC") to identify viable multi-family affordable housing for weatherization services.<sup>2</sup> Through this collaboration, PECO has initiated a pilot project with Project H.O.M.E., a nationally recognized nonprofit organization that operates a variety of affordable housing properties in Philadelphia. This pilot weatherization project will generate best practices and serve as a roadmap that other multi-family properties can follow. Importantly, this pilot will use both Act 129 funds and funding that is now available to weatherize multi-family affordable housing from the Department of Energy's Weatherization Assistance Program. This combination of funding streams will make it possible to achieve more extensive weatherization and conservation improvements that accrue deeper energy savings. PECO also has committed to working with PWCC to develop approaches to whole neighborhoods for weatherization, thereby effectively aggregating demand for conservation services.

This work makes excellent sense because targeting multi-family affordable housing provides an opportunity for PECO to accrue significant energy savings from a single project, while helping preserve affordable housing for low-income families. These projects also help PECO meet Act 129's mandate to coordinate its low-income Act 129 activities with other programs administered by the Commission or another federal or state agency.<sup>3</sup>

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<sup>2</sup> PWCC is a public and private collaborative of over 25 organizations, including advocates, governmental agencies, and various public and private owners and operators of multifamily affordable housing in southeastern Pennsylvania. PWCC advocates for the funding of weatherization for multifamily affordable housing properties and seeks to bring together funders with viable projects.

<sup>3</sup> 66 Pa.C.S. § 2806.1(b)(1)(G).

Because multi-family affordable housing projects provide these significant benefits, they should be an important component of all companies' revised EE&C plans. While it would be helpful for PECO's multi-family initiatives to become a formal part of the EE&C plan, PCOC fully supports PECO's efforts and collaboration with PWCC.

(2) Low-Income Energy Efficiency Program ("LEEP")

PECO proposes to revise its LEEP so that a limited number of low-income customers will have their inefficient existing refrigerator removed and replaced by a high efficiency refrigerator.<sup>4</sup> PECO proposes to recycle the old refrigerator in an environmentally appropriate manner.<sup>5</sup> A recent report by Penn State University evaluating Pennsylvania's LIURP program identified refrigerator replacement as one of the most important measure for driving energy savings.<sup>6</sup> Given the important energy savings that can be accrued through a refrigerator replacement program, PCOC supports it as an effective addition to PECO's existing LEEP.

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<sup>4</sup> PECO Energy Company's Revised Act 129 Energy Efficiency and Conservation Plan. Executive Summary, Docket No. M-2009-2093215, (Filed on September 15, 2010), at 3.

<sup>5</sup> Id.

<sup>6</sup> Long Term Study of Pennsylvania's Low Income Usage Reduction Program: Results of Analyses and Discussion, John Shingler, January 2009, Consumer Services Information Project, Penn State University, pg. 35.

**CONCLUSION**

In conclusion, PCOC thanks the Commission for the opportunity to submit these comments and encourages the Commission to continue its efforts to ensure low-income families receive satisfactory levels of service through the Act 129 EE&C plans.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Julie George", is written over a solid horizontal line.

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