



Weatherization Works!

April 17, 2012

Pennsylvania Public Utility Commission
Attention: Secretary
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265.

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PA PUC
SECRETARY'S BUREAU

RE: **Act 129 Energy Efficiency and Conservation Program Phase Two
Docket Number M-2012-2289411**

Dear Secretary Chiavetta:

The PA Weatherization Task Force is a network of 42 non-profit weatherization providers across the Commonwealth, many of whom have delivered weatherization services to low-income residents for more than 30 years. The existing network of weatherization providers has a proven track record weatherizing the homes of the most vulnerable residents of this Commonwealth. Over the past 30 years, this network has weatherized nearly 500,000 homes across the Commonwealth.

The PA Weatherization Task Force firmly supports the continuation and a second phase of the energy efficiency and conservation programs, and would like to submit the following comments on specific enumerated issues and topics in response to the Secretarial Letter.

3. Inclusion of a Demand Response Curtailment Program

The PA Weatherization Task Force supports the extension and continuation of the peak demand reduction targets and demand response programs. These programs reduce capacity and energy costs during the most expensive hours thereby reducing costs for all ratepayers. And this savings is vitally important to low income residents of the Commonwealth which we serve.

6. Inclusion of a Low-Income Sector Carve-Out

The PA Weatherization Task Force strongly believes that the low-income sector carve-out should be included in the next EE&C Plan. Act 129 specifically sets forth this requirement and this specific carve out should continue.

Assuming this carve out will continue, the Task Force strongly supports a requirement to include low-income households at or below 250% of the Federal Poverty Income Guidelines. Act 129 does not preclude this expansion and the Task Force supports a low-income sector carve-out structure which is proportionate to those households' share of total energy usage (at 250% of the Federal Poverty Income Guidelines).

Finally, the Task Force strongly supports the continuation and inclusion of a measure that will ensure that the Low-Income Sector Carve-Out is in addition to LIURP funding, as required in Act 129.

7. Transition Issues

The Task Force opposes awarding credit in Phase II to an EDC that achieves more than its 3% reduction in its Phase One EE Program.

In the case of an EDC that has met its Phase One EE target but has not spent its entire Phase One budget, the Task Force supports reconciling the remainder of its Phase One budget to ratepayers in order to help lower customers' utility bills.

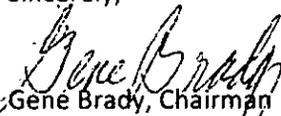
8. Other Act 129 Program Design Issues

The Task Force would respectfully request the Commission's consideration for the inclusion of a new Phase II component which would provide for the weatherization of multi-unit housing. Eligibility under this new component would be for low-income, elderly, and handicapped residents of the Commonwealth. And we would propose that PHFA be utilized as a partner in this endeavor because of the Authority's ongoing work in this sector. We are open to an ongoing dialogue regarding this idea and look forward to developing it further as the Commission's Act 129 Phase II process moves forward.

The PA Weatherization Task Force respectfully requests that the Pennsylvania Public Utility Commission enter these Comments to the Secretarial Letter into the record. We look forward to participating in the process as it moves forward.

Thank you for the opportunity to comment on this matter. Please feel free to contact me directly if you have any questions or need any additional information.

Sincerely,



Gene Brady, Chairman
PA Weatherization Task Force

CC: Megan Goode (Via Email)