



COMMUNITY LEGAL SERVICES  
OF PHILADELPHIA

June 25, 2012

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

Re: Energy Efficiency and Conservation Program  
Docket No. M 2012-2289411  
**Comments of Community Legal Services, Inc.**

Dear Secretary Chiavetta, Chairman Powelson and Commissioners:

Community Legal Services, Inc. (CLS) represented Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia in the PUC proceeding in which PECO Energy requested and obtained approval of its Act 129 EE&C Plan, Docket No. M-2009-2093215. CLS also receives about 600 requests a year from low-income Philadelphians for legal advice and representation on utility matters. Against this background, CLS submits these brief Comments on the Commission's Tentative Implementation Order, entered May 11, 2012, in the above-captioned docket.

CLS strongly supports the Commission's proposal to *continue* the prescription that each EDC's EE&C Plan is to include *specific energy efficiency measures for households at or below 150% of the Federal Poverty Income Guidelines*, in proportion to that sector's share of the total energy usage in the EDC's service territory. CLS, likewise, supports the Commission's proposal that each EDC's Phase II EE&C Plan obtain *a minimum of four-and-a-half percent (4.5%)* of the consumption reduction requirements. Regarding the proposal to allow EDCs to provide low-income measures to households up to 250% FPIG, CLS supports *the original language in Act 129 of 150% FPIG*. In our experience, there are still many low-income families with incomes at or below 150% FPIG who are in need of electric energy efficiency measures to reduce utility bills down to sustainable levels.

Respectfully submitted,

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Josie Pickens, Staff Attorney  
Energy Unit