

December 21, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Duquesne Light Energy Efficiency and Conservation Phase II Plan

Docket No. M-2012-2334399

Dear Secretary Chiavetta:

Enclosed please find Comments from the ReEnergize Pittsburgh coalition for above-referenced implementation plan.

Please note that Duquesne Light is a stakeholder in the ReEnergize Coalition, but does not endorse these Comments and had no involvement their formulation.

Evan R. Endres

Chair  
Policy Committee

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**  
Energy Efficiency and Conservation Program: Docket No. M-2012-2334399

Petition of Duquesne Light Company for  
Approval of its Energy Efficiency and  
Conservation Phase II Plan

Docket M-2012-2334399

**COMMENTS OF  
ReEnergize Pittsburgh Coalition**

## **Introduction**

ReEnergize Pittsburgh is a coalition of 29 stakeholders, representing government agencies, nonprofit organizations, private businesses and community groups. The ReEnergize effort is focused on increasing the scale of residential energy efficiency upgrades throughout Allegheny County. We appreciate this opportunity to submit comments on Duquesne Light's Energy Efficiency and Conservation (EE&C) Phase II Plan, Docket No. M-2012-2334399.

The Act 129 program and Duquesne Light's Phase I programs have opened our region and partners to unprecedented collaboration with the Utility. We applaud the PUC for continuing the Act 129 program and laying the framework for continued collaboration and benefit to our region's home energy efficiency sector.

Likewise we applaud Duquesne Light for its extensive menu of programs focused on home energy efficiency outlined in the utility's Phase II plan. As home energy efficiency is the directive the ReEnergize effort, the following comments are focused exclusively on that portion of Duquesne Light's Phase II plan.

We commend Duquesne Light for using multiple communication avenues to promote the program to customers, including working with local governments, community groups, and faith-based and ethnic-based organizations. While many Duquesne Light customers use electronic communication and the Internet, those who do not are more likely to represent potentially vulnerable populations, such as the elderly or lower income customers. We encourage Duquesne Light to continue collaboration with community partners like those engaged in the ReEnergize Pittsburgh effort so that these populations continue to be well informed and well served by Duquesne Light's programs.

The ReEnergize Coalition would like to call attention to the overall value of information collected by Duquesne Light's Act 129 programs. The Utility alone has the best overall understanding of a program's impact on reduced energy usage in the home. While we recognize the sensitive nature of an individual account holder's data, we urge Duquesne Light to find acceptable avenues, like aggregated totals, to communicate reduction and impact data to stakeholders. This kind of information sharing will only compound the impact of home

energy efficiency programs and perpetuate the ability of community partners, like ReEnergize Pittsburgh, to multiply the effect of Act 129.

## **Comments on Phase II implementation Plan, Residential Energy Efficiency**

### **3.2.1 Residential Energy Efficiency Rebate Program:**

We are pleased to see this excellent program continue into Phase II. By providing a rebate to offset the incremental cost increase of purchasing more efficient products, this program will continue to increase the deployment of Energy Star® appliances and other efficiency measures in our region. ReEnergize Pittsburgh will continue to educate the public on the benefit of this program.

We commend Duquesne Light for including rebates for upgrades that would be recommended through the home energy audit mentioned in its whole house program. These include rebates for insulation, heat pumps, occupancy sensors and other contractor installed measures.

We would recommend Duquesne Light include additional rebates for materials typically employed in the air sealing of homes. Incorporating those measures into the rebate program would incentivize more homeowners to implement the additional audit recommendations.

It is unclear whether Duquesne Light plans to offer incentives for LED lighting as part of its Residential Energy Efficiency Rebate Program. These LED bulbs and retrofit modules are already being stocked by major home improvement retailers. No single lighting technology can meet all consumer needs for varying lighting applications. As a result, lighting programs should be designed to offer a wide variety of choices to increase customer participation and satisfaction. Many of the current generation of LED light bulbs are attractive new options for efficiency programs because they overcome some of the barriers associated with consumer adoption of CFLs, including: instant on, dimmability, no mercury content and longevity.

Given the significant energy savings and benefits from LEDs, not including this product category throughout Phase II will lead to a significant loss of potential savings.

### **3.2.2 School Energy Pledge Program:**

ReEnergize Pittsburgh supports the School Pledge as a means to distribute information and resources to customers who may not self select to participate in the program. We believe the School Pledge is an important element of this program plan as it educates children, growing the next generation of energy conscious consumers.

The School Pledge has demonstrated its success in Phase I of this program, evidenced by the waiting list of schools that wish to participate. The plan does not clearly indicate how schools are chosen to participate. We encourage Duquesne Light to target the program to

schools in neighborhoods that have the highest energy usage rates. ReEnergize Pittsburgh is available to consult with Duquesne Light on how to manage such a targeting effort.

We are pleased that Duquesne Light plans to continue this successful program and we hope that they will consider funding it at an increased level to allow all schools who would like to participate an opportunity to do so.

### **3.2.3 Residential Appliance Recycling Program:**

We applaud Duquesne light for continuing the Residential Appliance Recycling Program. ReEnergize Pittsburgh recognizes the prevalence of obsolete, inefficient appliances in area homes. Duquesne Light provides an additional incentive for the easy removal and appropriate disposal of these items.

### **3.2.4 Residential Home Energy Reporting Program:**

We are thrilled to see the inclusion of the Opower program in Duquesne Light’s Phase II plan. A growing body of evidence demonstrates that so-called “social norming” tactics, in which consumers compare their consumption to others of similar structure size or other demographic information, inspires greater volume and measurable change in behavior than nearly any other motivating factor. We encourage Duquesne Light to extend this opportunity to its entire residential customer base, beyond the proposed 50,000 households, with a stepped increase in participation volumes each year of the program.

### **3.2.5 Residential Whole House Retrofit Program:**

We support Duquesne Light’s proposed inclusion of an energy audit and retrofit program. While individual rebates on specific energy-consuming devices can lead to incremental improvements, our work leads us to believe that a comprehensive “whole house” approach, starting with a qualified, measureable evaluation (energy audit), provides customers with the information needed to make educated decisions on how to invest in energy efficiency, leading to more significant energy savings than piecemeal improvements. We recognize Duquesne Light’s thoughtful, engineering-based approach that underlies this recommended program.

Duquesne Light’s Whole House Retrofit Program should account for a greater percentage of overall savings in the Phase II Plan. Currently the Whole House Retrofit program will provide only 0.7% of residential portfolio savings and 0.3% of total plan savings. We encourage Duquesne Light to increase funding levels and savings targets for this portion of the plan.

We would encourage Duquesne Light to provide rebates for a more extensive list of upgrades recommended through the homeowner’s energy audit. These rebates could include the addition of products related to air sealing and other materials that would be needed for

common recommendations. These include, air barrier/water seal fabric, duct mastic, foam board, two part foam, and pipe insulation. Combining these rebates with the linkage to the Keystone HELP program, as outlined in the plan, would encourage more homeowners to complete recommended actions.

While Duquesne Light lists the use a qualified CSP or Public Agency Partnership Program (PAPP) for the audit services, there is no reference to national standards for energy audits by the Building Performance Institute (BPI) or the RESNET Home Energy Rating System (HERS). If there is no requirement for the audit providers to be trained and certified and follow the accredited procedures, there will be no assurance that appropriate building science based recommendation are being provided to homeowner or followed by the contractors. If Duquesne Light does not require such certification, it will be missing opportunities for additional savings and seriously undermining an existing infrastructure for the training and delivery of standards based services within its territory.

We recommend that Duquesne Light modify its Whole House Retrofit Program to incorporate a standards-based approach consistent with Pennsylvania programs and nationally recognized best practices, thereby ensuring that appropriate recommendations will be made to homeowners that promote robust savings.

Finally, we recognize the important role the Conservation Service Provider (CSP) will play in the implementation of this program. We would like the PUC to prioritize the economic and workforce development benefits associated with investments of residential energy efficiency in establishment of the criteria for CSP selection.

### **3.5.2 Multifamily Housing Retrofit Program**

We commend Duquesne Light for developing a program specifically dedicated to multifamily housing and for engaging a Conservation Service Provider (CSP) to oversee its implementation. We especially commend Duquesne Light's proposal to offer a full service program for multifamily buildings, including: audit, technical assistance, contractor negotiation, construction oversight, bulk purchasing, and financing assistance. It is our experience that a one-stop-shop service is essential for moving potential projects beyond the audit stage all the way through to a completed retrofit.

Considering the complications associated with financing buildings with tenant paid utilities, we understand Duquesne Light's proposed focus on master metered accounts. However, we caution Duquesne Light to not only target master metered buildings as a matter of equality. Although residents indirectly benefit when master metered buildings are retrofitted through a decreased necessity for the property owner to raise rents due to high utility bills, it is only in tenant paid buildings that the residents directly benefit from retrofits. This is particularly important to be mindful of in affordable housing.

We are supportive of Duquesne Light’s proposal to target building stock comprised of dwelling units for income qualified occupants. We urge Duquesne Light and the Commission to measure income qualification not on a unit-by-unit basis, but as an entire building average. This will ensure income qualifying residents are still prioritized while also addressing the entire building as opposed to individual rooms. Addressing the entire building is essential for ensuring maximum energy savings.

We are supportive of Duquesne Light’s focus on the financing of retrofits. Duquesne Light specifically calls upon the eventual CSP to “integrate funding sources to include program and agency co-funding, performance contracting, grant funding, and available financing options.” It is our experience that providing multiple financing options is essential to successful retrofit implementation. To this end, we urge Duquesne Light to consider introducing a pilot on-bill financing option. This proposed pilot program will help inform the PUC’s current discussions about including an on-bill financing component in the future. Engaging in a pilot program will give Duquesne Light valuable practical experience, allowing them to better assist in the development of a successful on-bill financing option that works for both property owner and Utility.