

May 13, 2014

Secretary Rosemary Chiavetta
Public Utility Commission
400 North Street
Keystone Bldg.
Harrisburg, PA 17120

Re: PGW Universal Service and Energy Conservation Plan for 2014 2016-
Docket No. M-2013-2366301

Dear Secretary Chiavetta:

The undersigned organizations urge the Public Utility Commission ("Commission") to ensure that low-income renters residing in multifamily buildings in Philadelphia have access to weatherization services. We ask that the Commission require Philadelphia Gas Works (PGW) to incorporate strategies to serve multifamily renters through the Enhanced Low Income Retrofit Program (ELIRP).

Multifamily renters make up a sizeable portion of Philadelphia's low-income population and are in need of relief from energy expenses. According to the U. S. Census Bureau, nearly one-fifth of Philadelphian families reside in multifamily rental housing. Half of these households spend more than 30% of their income on rent and utility costs. Seventy-eight percent of multifamily rental buildings in Philadelphia were constructed more than 35 years ago. Nationwide, efficiency measures are far less likely to be found in multifamily apartments compared to other housing.¹

Despite the need for energy efficiency improvements in multifamily rental housing, PGW's implementation plan for ELIRP does not reflect the strategies that are necessary to deliver efficiency services to this housing stock. Successful low-income multifamily retrofit programs

¹ NCLC, NHT, and, ACEEE. *Partnering for Success: An Action Guide for Advancing Utility Energy Efficiency Funding for Multifamily Rental Housing*. 2013.

incorporate a whole-building approach and provide a streamlined process that allows building owners to access both residential and common area efficiency measures.² PGW's Universal Service and Energy Conservation Plan does not detail any strategies that are tailored to meet the efficiency needs of low-income multifamily housing.

Our organizations have joined together to ramp up energy efficiency investment in affordable multifamily homes to ensure that renters are not denied the benefits of lower energy bills and decent housing. We request that the Commission require PGW to develop specific strategies that will ensure that low-income multifamily renters can benefit from the ELIRP program.

Sincerely,

Keystone Energy Efficiency Alliance
Pennsylvania Utility Law Project
National Housing Trust
Natural Resources Defense Council

² ACEEE, *Apartment Hunters: Programs Searching for Energy Savings in Multifamily Buildings*, 2013.