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February 20, 2015

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

RE: PPL Electric Utilities Corporation –Petition for Approval of Act 129  
Phase II Energy Efficiency & Conservation Plan  
Docket No. M-2012-2334388

Dear Secretary Chiavetta:

I am submitting these comments on behalf of the Commission on Economic Opportunity and the Pennsylvania Weatherization Providers Task Force. The Commission on Economic Opportunity is a non-profit organization serving the low-income and elderly in Luzerne County, Pennsylvania and has advocated for its clients in utility matters, including PPL's Act 129 submissions. CEO has attended the various stakeholder meetings that the Company has held on its Act 129 program. The Pennsylvania Weatherization Providers Task Force is an association of Pennsylvania weatherization providers of which CEO is a member.

CEO and the Task Force are generally supportive of the changes requested by PPL relative to its Act 129 Phase II plan. The Company's requests include additional funding and measures for its low-income customers including a proposed increase in the number of "low cost" jobs, a de facto heating pilot, an increase in the number of low-income customers in its education program and a LED giveaway to low-income customers. We also support the apparent movement towards targeting confirmed low-income customers as opposed to using a telephone survey to determine whether customers who participate in the general residential Act 129 programs are low-income and then attributing those savings to the low-income sector. These are positive changes and will provide more opportunity and ability for low-income customers to conserve energy through direct measures and education.

Although we are supportive of the requested changes we want to make the following points and requests for clarification:

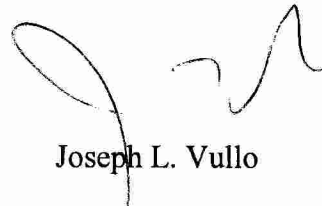
- In its de facto heating program the company is targeting 20 low-income customers to receive a high-efficiency heating system at no cost to the customer. Weatherization providers have had success with installing those systems and, with the decreasing costs for those systems, we believe there is potential to expand the

number of customers in the program. We hope the Company will look to increase the number of people served in the pilot and look forward to the results of the pilot.

- The Company is proposing to increase spending over two years in the amount of \$700,000 to cover the update of its WRAP tracking system. We are supportive of this upgrade if it will improve the coordination of Act 129 and Universal Service Programs and coordination between programs available to low-income customers. We would like to know how the proposed upgrade will improve the system and in particular how the upgrade will, if at all, improve the coordination of the Act 129 and Universal Service Programs so that low-income customers can better access and benefit from those programs.
- It appears from the Company's petition that its LED giveaway will be specifically targeted to confirmed low-income customers. We would request confirmation of the same and if that is the case, information on how the product will be distributed to low-income customers.
- The Company is proposing an increase of \$196,000 for call center costs for the residential and low-income residential education programs to be prorated among those programs. We request clarification as to the manner in which those costs will be prorated.

We reserve the right to participate should this matter be referred to an ALJ but at this time support the Company's request that the Commission resolve the issues based upon comments and reply comments.

Respectfully yours,



Joseph L. Vullo

JLV/jar

cc: All parties of record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation – Petition :  
For Approval of Act 129 Phase II Energy :      Docket No. M-2012-2334388  
Efficiency & Conservation Plan :

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Commission on Economic Opportunity's Comments to PPL Electric Utilities Corporation for Approval of Changes to Its Act 129 Phase II Plan upon the following participants this 20<sup>th</sup> day of February, 2015, via first-class mail and electronic mail:

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