

Weatherization Works!



Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Docket No.: M-2017-2596907

Dear Secretary Chiavetta:

Please consider the attached comments on the Pennsylvania Public Utility Commission's Comprehensive Review of Universal Service Programs and Energy Conservation Programs.

Sincerely,


Gene Brady
Chairman

Comments of the PA Weatherization Providers Task Force

The PA Weatherization Providers Task Force is a network of 38 organizations providing energy conservation services in each of the Commonwealth's 67 counties. Task Force providers provide a dual role of not only administering Energy Conservation programs but also the Department of Community and Economic Development Weatherization Assistance Program. Task Force providers are Community Based Organizations (CBO's) that have the experience and community presence to best meet the home energy needs of the low income households of our communities.

The following comments are being submitted on behalf of the PA Weatherization Providers Task Force. Thank you for the opportunity to make these comments part of the record.

In a 2014 study completed by Oak Ridge National Laboratory, low income households carry a larger energy burden, typically spending 16.3% of their total annual income on energy costs compared to 3.5% for other households. The Low Income Usage Reduction Program (LIURP) provides cost effective residential housing improvements such as insulation, air sealing, HVAC system, lighting and appliances. According to the U.S. Department of Energy, "In cold weather states, weatherization measures can reduce heating costs an average of 30%."

The existing regulations in 52 Pa. Code § defines a low income customer as "a residential utility customer with a household income at or below 150% of the Federal poverty guidelines." The PA Weatherization Task force recommends increasing the income guideline to 200% of the FGIP as this would not only be consistent with the Department of Community and Economic Development Weatherization Assistance Program but it would also increase the pool of potential applicants.

It is our recommendation that utility companies continue the use of Community Based Organizations (CBO's) to administer LIURP, Customer Assistance Programs and Hardship programs. CBO's have the unique ability to coordinate services across programs. This allows the programs to work efficiently and is the most cost effective avenue for both the CBO and the utility company.

The installation of LIURP measures and/or enrollment in a Customer Assistance Program does not always result lower energy costs. Prior to CAP enrollment or installation of LIURP measures, a customer should be required to participate in energy education. The most efficient way for customers to understand the importance of on time payments and to reduce their energy costs is to provide them with the most appropriate tools and resources.

Programs such as the Low Income Usage Reduction Program, Customer Assistance Programs and Hardship Programs enable low income families, senior citizens and the vulnerable of our communities to remain in their home by improving health and safety and maintaining utility service.