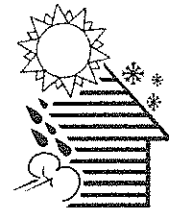


Weatherization Works!



April 27, 2020

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

Via Electronic Filing

**RE: Act 129 Energy Efficiency and Conservation Program Phase IV
Docket Number M-2020-3015228**

Dear Secretary Chiavetta:

The PA Weatherization Task Force is a network of 34 non-profit weatherization providers across the Commonwealth. These providers have delivered weatherization services to low-income residents for more than 35 years with a proven track record weatherizing the homes of the most vulnerable residents of this Commonwealth. Over the past 30 years, this network has weatherized nearly 575,000 homes across the Commonwealth.

The PA Weatherization Task Force firmly supports the continuation and a fourth phase of the energy efficiency and conservation programs and would like to submit the following comments on specific enumerated issues and topics in response to the March 12, 2020 Tentative Implementation Order (Order).

Inclusion of a Reduction Target Carve-out for the Government, Educational and Non-Profit Sector

The PA Weatherization Task Force supports the inclusion of a G/E/NP reduction carve-out. Further, the Task Force particularly supports the continuation of an emphasis placed on multifamily housing. Eligibility under this component would be for low-income, elderly, and handicapped residents of the Commonwealth in multifamily housing owned by non-profit or government entities. And we would propose that PHFA continue to be utilized as a partner in this endeavor because of the Agency's ongoing work in this sector.

Inclusion of a Low-Income Sector Carve-Out

The PA Weatherization Task Force supports the inclusion of a low-income sector carve-out; Act 129 specifically sets forth this requirement and a low-income specific carve out should continue.

However, the Task Force proposes that the carve out be greater than the 5.5% proposed. Because the overall proposed savings are less in Phase IV than in Phase III the proposed 5.5% low-income carve actually would result in less savings from the low-income sector in this phase than in Phase III.

In addition to supporting an increased low-income carve out, the Task Force proposes that a certain percentage of low-income savings be derived from direct install measures to low-income customers. Such measures may be more costly in the short term but will produce greater energy savings, and reduced energy costs for Pennsylvania's most vulnerable ratepayers. With the disproportionate economic impact of COVID 19 on low-income individuals, an impact that we fear will be felt for some time, it is important to provide those individuals with measures that will allow them to reduce their energy costs. Budgets will become even tighter for low-income people so measures that will allow them to save more money in energy costs will have an even greater impact now. It will also help reduce the stress on the budgets of general universal service programs.

Further, the Task Force supports the proposal that savings from counting residential customers who have received soft measures such as energy education or rebates and who by virtue of a telephone survey are determined to be low-income not be counted towards the low-income carve out.

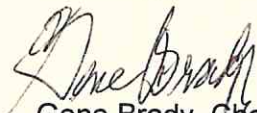
The Task Force also proposes that coordination between Act 129 and LIURP be increased by the requirement that EDCs contract for Act 129 with the Task Force members that provide their LIURP services. These organizations have a long history in serving low-income customers with energy reduction services and having one contractor for Act 129 and LIURP will allow for greater efficiency in program delivery.

Finally, the Task Force strongly supports the continuation and inclusion of a measure that will ensure that the Low-Income Sector Carve-Out is in addition to LIURP funding, as required in Act 129.

The PA Weatherization Task Force respectfully requests that the Pennsylvania Public Utility Commission enter these Comments into the record.

Thank you for the opportunity to comment on this matter. Please feel free to contact me directly if you have any questions or need any additional information.

Sincerely,



Gene Brady, Chairman
PA Weatherization Task Force