



June 18, 2020

***VIA Email and Electronic Filing***

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

Re: Act 129 Energy Efficiency and Conservation Program Implementation Phase IV  
Docket No. M-2020-3015228  
Suspension of Regulatory and Statutory Deadlines; Modifications to Filing and  
Service Requirements; Docket No. M-2020-3019262  
Petition of the Industrial Energy Consumers of Pennsylvania to Suspend  
Implementation of the Act 129 Phase IV Requirements and for Other Relief  
Docket No. P-2020-3019562

Dear Secretary Rosemary Chiavetta:

Thank you for considering these written comments in response to the Petition filed by the Industrial Energy Consumers of Pennsylvania (IECPA Petition) at Docket Numbers M-2020-3015228, M-2020-3019262 and P-2020-3019562. We are writing as members and allies of the Building Performance Association (BPA) to oppose the IECPA Petition and for the reasons described below, we strongly recommend that PA PUC reject the IECPA Petition.

We are part of the workforce that provides the “nuts and bolts” of efficiency upgrades to homes and buildings across Pennsylvania. We are proud of the high-quality services that our colleagues and allies deliver and the skilled jobs that they create in communities across Pennsylvania. We see firsthand every day that our customers value the energy efficiency programs that add new insulation in homes, upgrade lighting in schools, and install new equipment in manufacturing facilities and help residents and businesses save money on their utility bills.

We oppose the IECPA Petition because now is the wrong time to slash energy efficiency funding by half and to put the implementation of energy efficiency programs on hold. We believe there are better ways to work through the obstacles posed by the COVID crisis and we are ready to return to work in earnest when COVID health and safety protocols are established. There is

already a process in place where contractors and industry allies are working through these COVID safety issues with the utilities, state agencies and the PA PUC. The IECPA Petition is attempting to make and end run around these existing proceedings.

Instead of cutting programs and funding, the PA PUC should preserve energy efficiency programs because safe, properly designed and implemented energy efficiency programs are the lowest cost, most predictable and most immediate method to manage energy demand, create local jobs, provide opportunities for energy efficiency entrepreneurs while also providing health and comfort benefits to consumers and lower utility bills to customers in the long term.

In a post-COVID Pennsylvania economic environment, energy efficiency programs established under Act 129 will help drive economic recovery by creating new jobs and aiding existing workforces, boosting economic activity in key labor-intensive business sectors, and delivering benefits for all ratepayers.

We are ready to return to work and help achieve the goals of Act 129 in a manner that is safe for our industry and safe for our customers. Now is not the time to grant the IECPA Petition and slash support for energy efficiency. We respectfully request the PA PUC reject the IECPA Petition.

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