



ANDREW D. BIGDA  
Attorney-At-Law

September 21, 2022

via Electronic Filing

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: PPL Electric Utilities Corporation's Proposed Universal Service and Energy Conservation Plan for 2023-2027  
Docket No. M-2022-3031727

Dear Secretary Chiavetta:

Please accept for filing Comments of the Pennsylvania Weatherization Providers Task Force to PPL's Proposed Universal Service and Energy Conservation Plan for 2023-2027. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,

*s/Andrew D. Bigda*

Andrew D. Bigda

ADB/jar  
encl.

cc: All Parties of Record

340 Market Street • Kingston, PA 18704 | 4 Chestnut Street • Montrose, PA 18801  
Phone 570.714.4001 • Fax 570.714.4002  
Website: [www.bigdalaw.com](http://www.bigdalaw.com) • E-mail: [abigda@bigdalaw.com](mailto:abigda@bigdalaw.com)

Please respond to: Kingston

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation's :  
Proposed Universal Service and Energy : Docket No. M-2022-3031727  
Conservation Plan for 2023-2027 :

**COMMENTS OF THE PENNSYLVANIA WEATHERIZATION  
PROVIDERS TASK FORCE TO PPL'S PROPOSED  
UNIVERSAL SERVICE AND ENERGY CONSERVATION  
PLAN FOR 2023-2027**

**I. Introduction**

The PA Weatherization Providers Task Force (Task Force) is a network of 37 organizations providing energy conservation services in each of the Commonwealth's 67 counties. The Task Force entities provide a dual role of not only administering the Low Income Usage Reduction Programs (LIURP) but also the Department of Community and Economic Development Weatherization Assistance Program. Task Force providers are community-based organizations (CBOs) that have the experience and community presence to meet the home energy conservation needs of the low-income households of our communities.

The Task Force has advocated for its members and the low-income individuals served by those members in prior PUC rate cases and general proceedings. Its advocacy has been for the most part limited to a utility's universal service programs.

A number of Task Force members have administered the universal programs for PPL since the inception of those programs, including the Company's LIURP program, the Winter Relief Assistance Program (WRAP).

## **II. Comments**

### **A. LIURP Funding**

In its Plan, PPL proposes \$10 million annual LIURP funding for its Winter Relief Assistance Program (WRAP) for the years 2023 through 2027. PPL's WRAP annual funding has remained at \$10 million annually since its 2015 rate case. (R-2015-2469275). If the WRAP funding proposed by PPL is accepted WRAP funding will not have increased for twelve years.

Task Force members have seen the impacts of inflation on the number of WRAP and WAP jobs it can complete and certainly those inflationary impacts have not been considered by the Company in its proposal to keep LIURP funding at the level it has been since 2015. This period of inflation, that we have not seen for decades, influences the costs of weatherization materials, labor and transportation costs.

The Company also apparently did not consider the need of its ratepayers for WRAP services in proposing the same flat level of WRAP funding. The Company's WRAP needs assessment submitted with its Plan shows that as of April 1, 2022, there were 85,825 customers who can benefit from WRAP services and estimated a total cost of \$236,735,254 to serve those customers. With proposed funding remaining at \$10 million per year and 3,500 jobs per year for the length of the Plan, one can see the need for additional funding.

The Task Force recommends that WRAP funding be increased to \$14 million annually.

### **B. Use of Community Based Organizations**

The Company's Plan shows that it is moving away from its prior plan as it relates to the use of community-based organizations in WRAP. In its USECP for the years 2017-2019 (M-2016-2554787), the Company used at least seven community-based organizations, and Task Force

members, in its WRAP program. The Company's current Plan proposes to use just one CBO in WRAP, the Commission on Economic Opportunity.

Several Task Force members participated in PPL's RFP process for WRAP work during the latter part of 2021 and as indicated above only CEO was awarded a contract in January of 2022 to perform WRAP work for the years 2022 through 2024. Other CBOs, CBOs who had traditionally done the Company's WRAP work for years, were not awarded a contract. These contracts were awarded to private non-CBOs to the exclusion, except in CEO's case, to the CBOs who had been performing WRAP work under the Company's prior USECP. The RFP process for WRAP contractors apparently provided no preference for CBOs and appeared to be based solely on price. The RFP process was not transparent as to the factors considered or the weight of factors considered and remains vague today. The Company was invited to address the use of CBOs and to respond to PA-CLEEC's comments regarding the same by the PUC in its July 14, 2022, Order but failed to do so in its August 3, 2022 Reply. (See Company's Reply, PA PUC 1-52).

The Electricity Generation Customer Choice and Competition Act provides for a preference in the use of CBOs in a company's universal programs:

The Commission shall encourage the use of community-based organizations that have the necessary technical and administrative experience to be the direct providers of services or programs which reduce the energy consumption or otherwise assist low-income customers to afford electric service.

66 Pa. C.S. § 2804 (9)

The Task Force recommends that PPL continue to utilize CBOs as it has done for years. Task Force members also provide DCED's WAP program weatherization so having the same entity administer both programs makes sense not only for the utility company but also the customers they serve. Low-income households in communities are familiar with the services and

programs offered by their Task Force members. Because of this, Task Force members can coordinate the services of PPL's WRAP and DCED's WAP program.

CBOs would also help increase the efficiency of these similar programs. With CBO coordination, customers who are eligible for both programs can avoid duplication of services and in fact receive complimentary weatherization measures. Also, Task Force members, as CBOs, are aware of services above and beyond LIURP, WAP and weatherization. The connection Task Force members have to other entities allow them to make the appropriate referrals to agencies that may be able to assist a customer with issues that prevent them from being eligible for WRAP activities.

Integrated delivery has many advantages. Eliminating redundant administrative structures will save money for ratepayers and allow a greater portion of WRAP and WAP dollars to be devoted to providing services to customers. Providing customers with a single service delivery that provides efficiency services across all fuels in a single interaction will dramatically reduce confusion and fatigue among customers, increasing their willingness to participate in the programs. Integrated program delivery will also maximize the cost-effectiveness of the programs by reducing the unnecessarily high financial costs and time commitment of the multiple customer and program transactions that occur under the current, fragmented delivery structure.

In addition to energy assistance sources, Task Force members serve thousands of low income and disadvantaged members of the community, having direct knowledge of the barriers and impediments to self-sufficiency. Task Force members are in the business of helping poor people with their needs so have the experience and ability to innovate and evolve the services they provide and how they provide them. Task Force members have the focus and active experience to understand the needs of the community they serve. They operate as a one stop facility for the problems of the poor. Task Force member doing WRAP work on behalf of this Company can

provide, or refer, the low-income ratepayer, their low-income clients, other, non-energy related assistance, that can help that ratepayer better afford their utility costs and further reduce costs for the Company. The above reasons are why the legislature the Electricity Generation Customer Choice and Competition Act tasked the PUC with encouraging the use of CBOs in a utility's universal service program and why it should do so here.

### **III. Recommendations**

The Task Force, pending comments submitted by other parties and reserving the right to submit reply comments, at this time recommends the following:

1. That annual WRAP funding be increased to \$14 million and that any unspent funds be carried over to the next year's budget;
2. That the Company use the community-based organizations it has traditionally used in its universal service programs;

Respectfully submitted,

*s/Andrew D. Bigda*

---

ANDREW D. BIGDA, ESQUIRE  
340 Market Street  
Kingston, PA 18704  
(570) 714-4001  
e-mail: [abigda@bigdalaw.com](mailto:abigda@bigdalaw.com)  
Attorney for Pennsylvania Weatherization  
Providers Task Force

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation's :  
Proposed Universal Service and Energy : Docket No. M-2022-3031727  
Conservation Plan for 2023-2027 :

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Comments of the Pennsylvania Weatherization Providers Task Force upon the following participants this 21<sup>st</sup> day of September, 2022, via electronic mail:

Michael J. Shafer  
PPL  
Two North Ninth Street  
Allentown, PA 18101-1179  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Alex Bechtel, Esquire  
Laura Mohr, Esquire  
Bureau of Consumer Services  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[abechtel@pa.gov](mailto:abechtel@pa.gov)  
[laumohr@pa.gov](mailto:laumohr@pa.gov)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Richard Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Paul Diskin, Esquire  
Bureau of Technical Utility Services  
A Public Utility Commission  
Commonwealth Keystone Building  
3<sup>rd</sup> Floor  
Harrisburg, PA 17105  
[pdiskin@pa.gov](mailto:pdiskin@pa.gov)

Patrick Cicero, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[pcicero@paoca.org](mailto:pcicero@paoca.org)

Elizabeth R. Marx, Esquire  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

John F. Povilaitis, Esquire  
Alan M. Seltzer, Esquire  
Buchanan Ingersoll & Rooney, PC  
409 North Second Street  
Suite 500  
Harrisburg, PA 17101-1357  
[john.povilaitis@bipc.com](mailto:john.povilaitis@bipc.com)  
[alan.seltzer@bipc.com](mailto:alan.seltzer@bipc.com)

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

*s/Andrew D. Bigda*  
\_\_\_\_\_  
ANDREW D. BIGDA, ESQUIRE  
340 Market Street  
Kingston, PA 18704  
(570) 714-4001  
e-mail: [abigda@bigdalaw.com](mailto:abigda@bigdalaw.com)  
Attorney for Pennsylvania Weatherization  
Providers Task Force