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July 10, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Years 2024 - 2028; Docket Nos. M-2022-3036532; **REPLY COMMENTS OF THE PENNSYLVANIA COALITION OF LOCAL ENERGY EFFICIENCY CONTRACTORS TO THE COMMISSION'S ORDER DIRECTING SUPPLEMENTAL INFORMATION AND ESTABLISHING A COMMENT PERIOD**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Reply Comments of the Pennsylvania Coalition of Local Energy Efficiency Contractors to the Commission's Order Directing Supplemental Information and Establishing a Comment Period in the above-captioned dockets. Copies of the Reply Comments have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
*Counsel for the Pennsylvania Coalition of Local
Energy Efficiency Contractors*

TSS/jld
Enclosure

cc: Jennifer Johnson, Bureau of Consumer Services (via electronic mail – jennifjohn@pa.gov)
Regina Carter, Bureau of Consumer Services (via electronic mail – regincarte@pa.gov)
Christina Chase-Pettis, Office of Communications (via electronic mail – cchasepett@pa.gov)
Louise Fink Smith, Law Bureau (via electronic mail – finksmith@pa.gov)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

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Todd S. Stewart

DATED: July 10, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Universal Service & Energy : Docket No. M-2022-3036532
Conservation Plan of Metropolitan Edison : M-2022-3036533
Company, Pennsylvania Electric Company, : M-2022-3036534
Pennsylvania Power Company, and West : M-2022-3036535
Penn Power Company for Years 2024 - 2028 :

**REPLY COMMENTS OF THE PENNSYLVANIA COALITION
OF LOCAL ENERGY EFFICIENCY CONTRACTORS
TO THE COMMISSION’S ORDER DIRECTING SUPPLEMENTAL INFORMATION
AND ESTABLISHING A COMMENT PERIOD**

NOW COMES, The Pa Coalition of Local Energy Efficiency Contractors (“PA CLEEC”), by and through its counsel, Hawke McKeon & Sniscak LLP, and thanks the Commission for this opportunity to respond to the Comments submitted by other parties, namely, the Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE PA”). Both the OCA and CAUSE-PA raise a similar concern that also is the primary concern raised by PA CLEEC in this matter – the insufficiency of proposed WARM budgets in light of the persistent and prolonged national inflation - a condition impacting nearly every sector of the US economy. (CAUSE-PA Comments at 68-69; OCA Comments at 40-41). CAUSE-PA makes the point well: “Low income customers should not be further penalized by inflation through reduced provision and availability of critical energy reduction services.” (CAUSE-PA Comments at 68).

OCA is likewise concerned with the pace of inflation and its impact on LIURP budgets - and questions the wisdom of only addressing these budgets at three or five year intervals, during USECP proceedings. FirstEnergy has been transparent in relating that costs have indeed been increasing - and yet it cannot increase budgets except during USECP proceedings. The OCA

suggests it would make sense to allow utilities to adjust budgets *between* USECP filings, and concludes that should the Commission not adopt such an approach, then it would only be reasonable that LIURP budgets continuously increase between proceedings, in anticipation of increasing costs and higher rates from rate cases.

PA CLEEC joins OCA and CAUSE-PA in urging the Commission to require increased funding for LIURP to account for the effects of an ongoing inflationary period of historic magnitude. As discussed in PA CLEEC's comments, a failure to increase the budgets to account for the present rate of inflation is in fact a reduction in the WARM budget at a time when low-income customers are facing increased financial pressure coupled with increasing energy demands and costs. The Commission and FirstEnergy can get ahead of this growing problem by investing today instead of waiting until later, when the situation will have considerably worsened.

PA CLEEC thanks the Commission for this opportunity to comment and will make itself available to address any of these issues in the future.

Respectfully submitted,



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