

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Act 129 Energy Efficiency and
Conservation Program Phase V**

Docket No. M-2025-3052826

**JOINT REPLY COMMENTS TO THE PHASE V TENTATIVE IMPLEMENTATION
ORDER BY THE COMMISSION ON ECONOMIC OPPORTUNITY AND
PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE**

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I. INTRODUCTION

These reply comments of the Commission on Economic Opportunity and Pennsylvania Weatherization Providers Task Force will address and support several proposals set forth by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN) (collectively “Low Income Advocates”). The issues involve the low-income component of Act 129 and these reply comments will address those issues that would allow low-income ratepayers fuller, and longer lasting, benefits of reducing their energy consumption and thereby reducing their energy burden.

CEO and the Task Force agree with the Low Income Advocates that to date the Act 129 low income program requirements ‘have largely just skimmed the surface’ and have ‘failed to deliver durable and comprehensive energy reduction’ leaving low-income ratepayers with a disparately high energy burden. As the Low Income Advocates point out the Commission’s encouragement and recommendations regarding low income issues have failed to result in significant energy savings and bill reductions. Low income ratepayers contribute to Act 129 costs and change is needed for them to equitably share in its benefits.

II. REPLY COMMENTS

- 1. The Commission should adjust the acquisition cost and savings targets for low-income customers to accommodate the installation of deeper and more durable energy savings measures.**

In their comments, the Low Income Advocates set forth a series of integrated recommendations that would result in a larger percentage of savings obtained from the low income sector while at the same time ensuring the employment of comprehensive, whole home measures that would reduce the energy burden of low-income ratepayers. The recommendations include setting statewide low-income budgets on the MPS’ Statewide Program Potential Low-income acquisition cost of \$958.60 rather than the proposed adjusted statewide low-income acquisition cost of \$646.30, increasing the statewide Phase V low-income savings goal to 308,041 MWh, requiring that at least 25% of those savings come from comprehensive measures

and precluding any carry over of Phase IV savings from being applied to comprehensive savings. See Low-Income Comments Section III(A)(i).

2. Coordination of Act 129, LIURP and other energy programs would be best served by consolidating the programs for delivery by existing Weatherization Assistance Providers

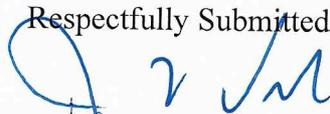
As set forth by the Low Income Advocates, EDCs have moved away from using local, community-based organizations in their LIURP and Act 129 programs. This has resulted in competition as opposed to coordination. The larger CSPs used by the utility companies lack a local presence and lack the trust of the local communities they enter to serve. The CSPs also lack the breadth of programs offered by community-based organizations that could aid low income ratepayers in other areas such as housing.

CEO and the Task Force agree with the Low Income Advocates recommendation to mandate the use of Weatherization Assistance Program (WAP) providers in the delivery of Act 129 services or at least require CSPs to use WAP providers in the delivery of those services. This would avoid duplication of services, reduce confusion among low-income ratepayers and make for more efficient, comprehensive delivery of Act 129 measures.

III. CONCLUSION

CEO and the Task Force appreciate the opportunity to offer these reply comments. The reply comments are meant to highlight particular areas of import to our organizations and to support the above recommendations and not to imply acceptance of or objection to other comments submitted by the numerous interested parties.

Respectfully Submitted,



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