



April 22, 2025

Via Electronic Filing

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

**Re: Reply Comments of the Sierra Club, Energy Efficiency and Conservation Program
Tentative Implementation Order for Phase V, Docket No. M-2025-3052826**

Dear Secretary Chiavetta,

Thank you for the opportunity to contribute to this docket. Please find enclosed reply comments submitted by the Sierra Club concerning the Tentative Implementation Order in the above-referenced proceedings. Please feel free to contact us directly if any additional information may be of assistance.

Thank you again,

 /s/ Nate Reagle

Nate Reagle
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Act 129 Energy Efficiency and)	
Conservation Program)	Docket No. M-2025-3052826
Implementation Phase V)	

Reply Comments of the Sierra Club

Introduction

The Pennsylvania Public Utility Commission (the “Commission”) on February 20th of this year issued a Tentative Implementation Order (the “TO”) regarding Phase V of the Energy Efficiency and Conservation Program under Pennsylvania’s Act 129. A comment period was set, with numerous parties—including the Sierra Club, as part of the Joint Comments of the Energy Advocates—submitting material, and a corresponding reply comment period likewise set.¹

The Sierra Club is the nation’s oldest and largest grassroots environmental organization, with nearly 25,000 members in Pennsylvania and nearly 635,000 members nationwide. The Sierra Club’s mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As such the Club is committed to reducing air and water pollution, along with consumer costs, through beneficial electrification and efficient use of electricity sector-wide.

Sierra Club believes that implementation of Act 129 is an important part of addressing these problems in Pennsylvania. As Pennsylvania Department of Environmental Protection (“DEP”) noted in their comments on the TO, “[c]limate change threatens Pennsylvanians by

¹ See Commission Notice, at <https://www.puc.pa.gov/pcdocs/1871096.pdf>.

fueling increasingly common and severe weather events that impact our energy sector. . . .

[T]hese affordability and reliability challenges often disproportionately affect communities of color, low-income communities, the elderly, and the medically vulnerable.” DEP Comments at

2. Beneficial electrification and energy efficiency thus go together hand-in-hand to address the problems facing Pennsylvanians.

Comments

Act 129 charges the Commission with adoption of programs to require electric distribution companies to implement “energy efficiency and conservation plans” for the purpose of reducing energy demand and consumption in Pennsylvania. 66 Pa. C.S. § 2806.1(a). As per the Act, energy efficiency and conservation measures include such things as

. . . solar or solar photovoltaic panels, energy efficient windows and doors, energy efficient lighting, including exit sign retrofit, high bay fluorescent retrofit and pedestrian and traffic signal conversion, geothermal heating, insulation, air sealing, reflective roof coatings, energy efficient heating and cooling equipment or systems and energy efficient appliances . . .

Id. at § 2806.1(m). As the language of the Act and prior orders of the Commission implementing it demonstrate, Act 129 is concerned with reducing electricity usage through ensuring consumers have access to efficient and clean-energy technologies. Accordingly, the Sierra Club appreciates the TO’s discussion of the importance of ensuring that Act 129 programs work in harmony with other Pennsylvania and Federal programs that may be available for beneficial electrification.

Moreover, there is no tension between the Act 129 directive to reduce energy demand and beneficial electrification, not least because such electrification has the effect of reducing overall energy consumption. 66 Pa. C.S. § 2806.1(a).²

² See also Comments of Advanced Energy United, <https://www.puc.pa.gov/pcdocs/1873514.pdf>, at 15.

As the TO notes, “the expected expansion of other state and federal conservation programs in the Commonwealth creates an opportunity for the EDCs to support [beneficial electrification] without violating the intent of the Act.” TO at 56. The Sierra Club fully agrees that, particularly where such beneficial electrification programs exist, “EDCs can *and should* incentivize the home or business to install a high efficiency electric unit.” *Id.* (emphasis added).

It is absolutely the case that federal Inflation Reduction Act funding and other measures of beneficial electrification programs present “a unique opportunity to amplify the benefits of Act 129 investments . . . without violating the intent of the Act” to support beneficial electrification. *Id.* at 57. By contrast, potential EDC proposals to include incentives to de-electrify or re-carbonize homes or businesses are inconsistent with both the aims of Act 129 and the prudent harmonization of Act 129 programs with other state and federal beneficial electrification opportunities discussed in the TO, and should not be approved.