



August 15, 2025

**VIA E-File**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

**RE: Act 129 Energy Efficiency and Conservation Program – Phase V  
Energy Efficiency and Conservation Plan Template  
Docket No. M-2025-3052826**

Dear Secretary Homsher,

Please find the attached **Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN) (collectively “Low Income Advocates”)** for filing in the above referenced matter.

Please contact me or my co-counsel with any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Elizabeth R. Marx".

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Act 129 Energy Efficiency and Conservation Program Phase V : Docket No. M-2025-3052826  
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JOINT COMMENTS OF  
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA (CAUSE-PA)  
AND  
TENANT UNION REPRESENTATIVE NETWORK (TURN)

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## **I. INTRODUCTION**

On July 24, 2025, the Pennsylvania Public Utility Commission (Commission) issued a Secretarial Letter seeking comment on its proposed Act 129 Phase V Energy Efficiency and Conservation Plan Template (herein, Phase V Template or template). The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)<sup>1</sup> and the Tenant Union Representative Network (TURN)<sup>2</sup> (collectively, the Low Income Advocates) offer the following comments and recommendations for the Commission's consideration.

The Low Income Advocates support the creation, development, and execution of robust energy efficiency and conservation programming targeted to assist low income Pennsylvanians. These programs offer a crucial tool to help Pennsylvania families reduce home energy use, improve their ability to maintain safe and affordable energy services, and support the health and welfare of Pennsylvania's most vulnerable families. For that reason, the Low Income Advocates have been active participants in the planning, litigation, implementation, and review of Act 129 for many years. Through this active engagement, the Low Income Advocates have gained significant experience and expertise with the design and operation of these programs across Pennsylvania.

The Low Income Advocates' comments and recommendations in response to the proposed Phase V Template are intended to improve specificity within each EDC's Act 129 Phase V Plan, which will in turn help promote program transparency, improve accountability, and enhance

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<sup>1</sup> **CAUSE-PA** is an unincorporated association of low and moderate income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain safe, affordable utility services to their homes. Membership is open to moderate and low income individuals residing throughout the Commonwealth of Pennsylvania who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence.

<sup>2</sup> **TURN** is a not-for-profit organization with moderate and low income tenant members. All of TURN's members are either customers of or dependent on service from the public utilities of this Commonwealth. TURN has intervened in numerous matters before the Commission.

oversight and review. We appreciate the opportunity to comment on the Commission’s Phase V Template, and look forward to collaborating with the Commission and the EDCs to help strengthen Act 129 programming through the remainder of Phase IV and start of Phase V.

## II. COMMENTS

### 1. Overview of Plan

*1.2 Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the EDC’s process for stakeholder engagement.*

Stakeholder engagement is a critical component of each EDC’s Plan, and we are supportive of the Commission’s decision to require EDCs to describe the process for stakeholder engagement within each Phase V Plan. That said, we have concerns about inclusion of stakeholder engagement within this broader section regarding key assumptions and uncertainties, as it may be insufficient to signal to the utilities that they must describe the stakeholder process used to develop its Phase V Plan **and** the process each utility intends to use throughout the course of the Phase V Plans. Both aspects of stakeholder engagement – in the planning and implementation phases – are important to ensure the Plans are meeting identified needs of consumers from each customer class and customer segment. Given that each phase of Act 129 is five years it is essential that stakeholders are provided with fulsome opportunities to share their needs and perspectives with the EDCs not only when the Plans are being developed but throughout the implementation period.

In its Final Implementation Order, the Commission declined to adopt recommendations from dozens of organizations urging more robust opportunities for stakeholder engagement – summarily concluding that “EDCs and participating stakeholders have developed a well-functioning system of stakeholder engagement that allows for mutual feedback to aid in the

implementation of successful EE&C programs...”<sup>3</sup> The Low Income Advocates respectfully submit that the Commission’s conclusion is inconsistent with our experience as a stakeholder. We note that “stakeholder engagement” is often relegated to informational meetings, where the opportunity to provide meaningful input is minimal. Hosting a meeting and sharing information is not, on its own, *engagement*. Authentic engagement requires interaction, and a meaningful opportunity to provide feedback that is appropriately valued and, where appropriate, acted upon.

We recommend that the Commission include a separate section for stakeholder engagement within the overview section of the Phase V Plan. In this section, we recommend that the Commission require each EDC to:

- Describe the EDC’s engagement with stakeholders from each customer segment (residential, low income, small C&I, and large C&I) in developing its Phase V Plan;
- Describe the EDC’s plans for ongoing engagement with stakeholders from each customer segment throughout Phase V to ensure programs are responsive to changing needs in each customer segment;
- Identify the stakeholders the EDC has and/or plans to engage with, as well as the nature of that engagement and the extent to which the EDC incorporated stakeholder feedback into its proposed Phase V Plan.

We believe these additions to the template will help to improve the quality of stakeholder engagement throughout the planning and implementation of Phase V programs. At a minimum, section 1.2 should be broadened to include the specific requirement that EDCs describe their stakeholder engagement in both the development and implementation of their plans.

**1.8** *Summary description of EDC’s data management, quality assurance and evaluation processes; include how EE&C programs will be updated and refined based on evaluation results.*

Low Income Advocates submit that this section of the template should be broadened to include data sharing, not simply data management. Strategic data sharing can help facilitate

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<sup>3</sup> See Phase V Final Implementation Order (FIO) at 209.

enhanced program coordination and, when accomplished with customer-informed consent and data protective measures in place, can provide a host of benefits to both customers and EDCs.<sup>4</sup> In its Final Implementation Order, the Commission recognized “the importance and complexity of data sharing across program administrators,”<sup>5</sup> and established a working group to explore the issue and develop recommendations “on potential solutions and next steps to foster data sharing between program administrators.”<sup>6</sup> Specifically, the working group is charged with identifying requirements for customer consent, guidelines for third party data disclosure, development of a template Memorandum of Understanding, recommendations for data storage, and allocation of administrative costs.

The Commission’s proposed template does not require the EDCs to disclose plans for data sharing within their proposed Phase V EE&C Plans. However, in anticipation of the working group recommendations, and in recognition of the important role data sharing can play to improve the delivery of program services, we recommend the Commission acknowledge and prepare for the important role that data sharing may play in Phase V programs. Specifically, the Commission should require EDCs to discuss planned data sharing within their Phase V plans.

For the purposes of this overview section regarding data management, we recommend the Commission require utilities to identify whether it intends to leverage data from other programs as a component of its data management, quality assurance, and evaluation process. Below, in section 5, we recommend the Commission require utilities to include further details regarding plans to leverage data sharing arrangements in the administration of its Phase V programs.

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<sup>4</sup> FIO at 180.

<sup>5</sup> *Id.*

<sup>6</sup> FIO at 180-181.

**1.9 Summary description of cost recovery mechanism.** *FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class and the rationale for separating or consolidating rate districts from a cost recovery standpoint.*

In the Commission-approved settlement approving FirstEnergy to consolidate rate districts, FirstEnergy agreed to the following:

FE PA will hold collaborative meetings in advance of filings for modifications to the Joint Applicants' regulatory-required plans or its next scheduled plan filings, to include ... Energy Efficiency and Conservation Plan, ... . The collaborative meetings will be used to discuss the consolidation's impact on each of the respective filings and FE PA's plans to unify such programs moving forward.<sup>7</sup>

CAUSE-PA was a signatory party to this settlement. To our knowledge, FirstEnergy has not yet hosted a collaborative meeting to discuss how its recent consolidation will impact its Phase V Energy Efficiency and Conservation Plan.

In addition to requiring that FirstEnergy explain the rationale for consolidating or maintaining separate rate districts for the purposes of cost recovery, the Low Income Advocates recommend the Commission require FirstEnergy to identify whether stakeholders raised concerns with FirstEnergy's approach in the context of the required collaborative, and how those concerns were addressed in FirstEnergy's proposal. Further, to the extent FirstEnergy proposes to consolidate rate recovery, the Commission should require FirstEnergy to explain how it will ensure equitable distribution of services across its substantial geographic footprint. This is a critical consideration the Commission must review when assessing the justness and reasonableness of FirstEnergy's proposed recovery method, as it will help ensure each rate district is equitably served.

### **3. Program Descriptions**

**3.1.5** *Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants. (2025 IO at 174) Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to electricity.*

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<sup>7</sup> Joint Application of Med Ed, Penelec, Penn Power, West Penn Power, et al, Joint Petition for Approval of Settlement of All Issues, Pa. PUC Docket No. A-2023-3038771, 8792, 8793, 8794, 8795, 8807, 8808, at 17 (filed Aug. 30, 2023).

*Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.*

The Low Income Advocates strongly support the Commission’s requirement that EDCs detail efforts to align high efficiency heat pump and heat pump water heater measures available through Act 129 with the equipment available through HEAR or other non-Act 129 programs. We presume “other non-Act 129 programs” includes utility-run Low Income Usage Reduction Programs, and the federal Weatherization Assistance Program and LIHEAP Crisis Interface Program. We are concerned, however, that the lack of specificity may narrow the scope of coordination efforts across other non-Act 129 programs, which may in turn forego important opportunities for program alignment to benefit consumers. We recommend the Commission specify the “other non-Act 129 programs” intended for inclusion in this section of the template to help ensure that EDCs align incentives across a broader scope of leveraged programs.

Moreover, in addition to requiring a summary of heat pump and heat pump water heater measures will be aligned across non-Act 129 programs, we recommend that the Commission also require each EDC to describe how it will coordinate *delivery* of aligned measures with HEAR and other non-Act 129 programs. Product alignment alone will not appropriately leverage resources if the product delivery methods are not also aligned.

**3.1.6** *Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan and the expected contribution to portfolio annual and lifecycle MWh and MW savings. Note that the contribution of FTM measures is limited to ten percent of total plan savings. (2025 IO at 78)*

In its Tentative Implementation Order, the Commission initially proposed to eliminate FTM measures from Phase V. While the Low Income Advocates did not address this issue explicitly in our comments, we agreed with the Commission that FTM investments are “part of operating the distribution system rather than an EE&C Plan component.”<sup>8</sup> While the Commission

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<sup>8</sup> Phase V TIO at 30.

ultimately permitted inclusion of FTM measures within Phase V, limited to 10% of total plan savings, we are concerned that the Commission has not imposed adequate safeguards to prevent inappropriate use of Act 129 dollars to pay for costs already recovered through base rates or the EDC's approved Distribution System Improvement Charge (DSIC).

We recommend that the Commission require EDCs to explain how each FTM measure/initiative will be funded, including the portion of funding that is expected to come from Act 129 budgets, if any, and the portion that will be funded through other means – and provide the basis of the EDC's proposed funding methodology. EDCs should describe in their Plan how the FTM measure connects to its Long Term Infrastructure Improvement Plan (LTIIP), whether recovery is already permitted through base rates or an approved Distribution System Improvement Charge (DSIC), how the EDC will prevent double recovery of resources (including staff time) used to support FTMs.

We also recommend that EDCs provide clear and complete information describing their proposed approach to calculating FTM savings and documenting all assumptions upon which these savings assumptions are based. Estimating savings from certain FTM measures has been contentious in other jurisdictions. A Commission-directed Conservation Voltage Reduction (CVR) Work Group in Maryland “reviewed the inputs and calculations used to claim CVR impacts. This review revealed that CVR savings assumptions are based on studies more than 10 years old and found little consistency in the methodology of the calculations across utilities...Similarly, the reported costs of CVR vary drastically from utility to utility and have been hard for some of the utilities to fully identify.”<sup>9</sup> Thus, the Low Income Advocates urge the Commission to impose

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<sup>9</sup> EmPOWER Conservation Voltage Reduction Working Group Report, MD PUC Docket ML311369, at 2-3 (Aug. 1, 2024), <https://webpscxb.psc.state.md.us/DMS/case/9705>.

requirements in the Plan process to ensure the reliability of any FTM measures proposed by the EDCs.

*3.1.7 Describe how the EDC defines “comprehensive” in the context of EE&C plan design and delivery and the comprehensive program(s) to be offered to the residential and non-residential rate classes. Describe the measure mix or delivery mechanism that qualifies each program as comprehensive consistent with the requirements of the Phase V Implementation Order. Refer to the “Table 8 Addendum” in the Microsoft Excel version of the template tables for a list of residential measures designated as “comprehensive.” (2025 IO at 49-52 and 72)*

We fully support the Commission’s inclusion of a section highlighting comprehensive programming within its template. Comprehensive, whole-home programming that prioritizes deep, long-lasting energy efficiency and weatherization measures offers a proven approach to improve the health and safety of Pennsylvania’s low income families. To that end, it is necessary to not only consider the comprehensiveness of measures, but to understand how measures are grouped to form comprehensive programs. For example, a program that includes incentives for a comprehensive measure (such as Duct Sealing and Duct Insulation) may not be a comprehensive program if expected participation in the comprehensive measure is negligible. Providing weighted average Estimated Useful Life (EUL) at the program level, in addition to at the measure level, will provide an indication of program comprehensiveness by indicating the prioritization of comprehensive measures in the program.

To further the usefulness of the data collected in this section of the template, we recommend adding a column to Table 6 between “Compliance MWh-year” and “Compliance MW-year.” This column should be labeled “*Lifecycle MWh Savings*” and should report the aggregate weighted average of measure lifecycle MWh savings for all measures anticipated to be promoted in the program. In addition, we recommend adding two columns to Table 8 indicating (1) which program(s) the measure will be available in and (2) the quantity of each measure the EDC estimates it will provide incentives for over the course of the Phase. This additional

information will meaningfully improve the Commission’s ability to assess the comprehensive nature of program proposals, and the ability for programs to drive lasting energy and bill savings.

*3.2 Residential Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the following headings*

*& 3.2.1. Low-Income Sub-Sector (as defined by 66 Pa. C.S. 2806.1) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs.*

We have a number of suggestions to improve and strengthen the required plan components for residential and low income programs. To streamline our comments, we have combined our recommendations for sections 3.2 and 3.2.1; however, we note that these sections (residential and low income sector program details) should remain separate in the template.

- i. Target market – including market size to help frame participation estimates (e.g. number of households, electric sales etc.).*

The Low Income Advocates are concerned that this “target market” section lacks needed specificity to address how EDCs will target different types of residential housing (e.g., single family / multifamily / manufactured) and different types of owners (e.g., homeowner / landlord / tenant) within the residential and low income sectors. Differences in housing type and ownership necessitate variations in approach to serve each target market.

We note that a significant portion of Pennsylvania’s low income families are renters and/or reside in multifamily buildings. As the Commission has acknowledged in prior phases, multifamily buildings offer great potential for energy efficiency improvements yet remain difficult to reach through Act 129 programming.<sup>10</sup> Indeed, there are a host of identified barriers to participation for

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<sup>10</sup> See Phase III Final Implementation Order at 76.

tenants and multifamily buildings, discussed at length through comments in the Implementation Plan proceeding.<sup>11</sup>

In describing the target market for each program within the residential and low income sectors, we recommend that the Commission require EDCs to identify whether and to what extent the program will target different housing and ownership types. Specifically, EDCs should be required to identify the size and projected participation rates for each segment (single family / multifamily / manufactured, and owner / renter).

*ii. Implementation strategy (including expected changes that may occur in different program years).*

In describing the EDC's implementation strategy for each program and/or subprogram within an umbrella of programs, the Commission should require each EDC to summarize how it will ensure that program services are provided equitably across diverse communities in its service territory. Each of the four EDCs subject to Act 129 cover large and diverse regions that cover urban, suburban, and rural areas with wide variations in poverty rate and demographics. Critically, EDCs should be required to identify how each program will be implemented to reach historically underserved low income communities and communities of color, and how it intends to track and measure success. Improved specificity with regard to implementation strategy across regions and populations will help the Commission, EDCs, and interested stakeholders to better understand how, and in what ways EDCs ensure that services are not provided in a biased or inequitable manner.

If the Commission is not inclined to include these details as part of the EDC's implementation strategy, we recommend the Commission add an additional bullet to sections 3.2

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<sup>11</sup> See Joint Comments of the Coalition for Equitable Energy and Housing in PA (CEEH-PA) at 6-16; Joint Comments of the Low Income Advocates at 47-51; see also Dr. Elizabeth Kelley, Michael Li, Matt Galport, and Shannon Kahl. *Addressing Multifamily Hesitance to Participation in Energy Efficiency Programs*. ILLUME Advising, LLC. (2022). <https://illumeadvising.com/files/Addressing-Multifamily-Hesitance-to-Participation-in-Energy-Efficiency-Programs.pdf>

and 3.2.1 requiring the EDCs to explain its strategy for ensuring equitable distribution of program services across diverse communities and, specifically, how it will reach historically underserved populations.

- iii. *Administrative requirements – include internal and external staffing levels expressed on a full-time equivalent (FTE) basis.*

To ensure appropriate allocation of costs, we recommend that the Commission require EDCs to explain how it will track and allocate administrative time for employees and/or contractors that are not solely dedicated to working on Act 129 programming or who work across multiple sectors within the broader program portfolio.

- iv. *Savings projections – include tables with estimated total annual MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9.*

Buildings consume a large amount of energy over many years. Thus, the most meaningful and effective energy efficiency improvements are those that will continue to save energy – and reduce costs - for an extended period of time. To help ensure inclusion of measures with long-term energy and bill savings, the Low Income Advocates recommend the Commission direct the EDCs to provide estimated *lifecycle* energy savings calculations in Table 9, in addition to annual MWh and MW values.

- v. *Inter-Program Coordination*

Coordination of Act 129 services with other available programs is critically important to maximize energy and bill savings – helping ensure delivery of leveraged benefits to residential and low income households. We recommend that the Commission add an additional requirement in section 3.2 (and, thus, reflected in 3.2.1) requiring EDCs to describe whether and how each residential Act 129 program will be coordinated among over-lapping gas and water utility programs, as well as local, state, and federal efficiency, weatherization, and home repair programs.

By reducing customer “friction” or the “transaction cost” that each customer incurs to research, understand, schedule, and manage her or his participation in programs, customer savings can more easily be increased, thus providing greater bill savings for participants.

While we recognize that the proposed template includes portfolio-wide coordination details in section 4.4, we are concerned that this will not provide needed specificity with regard to coordination of individual Act 129 programming with non-Act 129 resources.

*vi. Intra-Program Coordination*

In addition to addressing inter-program coordination with external non-Act 129 programs, we recommend the Commission also add an additional requirement in section 3.2 (and, thus, reflected in 3.2.1) requiring EDCs to describe how each residential Act 129 program will be coordinated with other programs within its Act 129 program portfolio and how participation in different components of umbrella programs will be encouraged. Given that it can be costly to acquire new customer participation in each program, maximizing cross-program participation within each EDC’s portfolio can increase savings and reduce program costs. And as stated above, reducing the “friction” that customers experience will make it easier for them to participate, thus increasing EDC reported savings at a lower cost. EDCs should describe how they will use participation in its programs as a lever to encourage customers to participate in its other offerings. For example, if an EDC program proposes to promote smart thermostats, and the sponsoring EDC also proposes a smart thermostat-based demand response program, the EDC should explain how participation in those programs be coordinated. Similarly, the EDC should explain how it will encourage a home retrofit program participant to seek incentives for additional measures – such as HVAC – through other available programs.

**3.3** *Small C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).*

The Low Income Advocates recommend that the Commission include an additional bullet within this section directing EDCs to discuss whether its proposed small C&I sector programs are designed to serve multifamily buildings that fall within the Small C&I Sector, and how the EDCs will engage with multifamily properties to recruit their participation. The description should include how buildings with a combination of commercial and residential meters will be served, as well as how master-metered multifamily housing buildings will be served. In turn, each EDC should explain whether and to what extent it will provide enhanced incentives for affordable multifamily buildings to help bridge the gap in services to this critically important sector.

According to research conducted by the American Council for an Energy Efficient Economy (ACEEE), “The proportion of income that low-income multifamily households spend on energy is 2.3 times the proportion spent by the median multifamily household (Drehobl, Ross, and Ayala 2020). These high energy burdens typically result from multiple factors, one of which is that property owners may not make energy-saving improvements such as weatherizing or replacing old, inefficient appliances. Affordable housing providers, in particular, face significant resource constraints and may be unable to make capital improvements to their properties, leaving many older affordable buildings in need of repairs, maintenance, and upgrades.”<sup>12</sup>

Given the importance of reaching this specific subset of residences, EDCs need to describe specific strategies in their plans to reach this subsector in order to ensure that all building types are proportionally and equitably served by Act 129 programming.

**3.5 Government/Nonprofit/Institutional Sector (as defined by 66 Pa. C.S. § 2806.1) – Qualitatively describe how the Government/Nonprofit/Institutional Sector will be served.**

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<sup>12</sup> ACEEE, An Overview of Affordable Multifamily Programs: Best Practices and Context for Utilities, at 1 (Sept. 2021) [https://www.aceee.org/sites/default/files/pdfs/affordable\\_multifamily\\_programs\\_final\\_9-14-21.pdf](https://www.aceee.org/sites/default/files/pdfs/affordable_multifamily_programs_final_9-14-21.pdf).

Each component of the Government/Nonprofit/Institutional Sector should have its own separate qualitative description. For example, to be successful, the strategies to serve government buildings would be different than the strategies used to serve nonprofits and institutions. A municipal building would require vastly different outreach and service approaches than a large housing authority or a medium-sized nonprofit – yet all of these different subsectors are included in the G/N/I category.

#### **4. Program Management and Implementation Strategies**

**4.3.1** *Provide detailed justifications for why the EDC did or did not choose to use a CSP to perform specific EE&C plan functions.*

In addition to this general requirement, the Low Income Advocates recommend that the Commission further direct the EDCs to identify whether it will use Community Based Organizations (CBOs) to deliver its Act 129 programs, in whole or in part. This is especially critical for low income program delivery to allow for integrated program delivery in tandem with other local, state, and federal programs.

As mentioned previously, the communities that need Act 129 services the most are often difficult to access through traditional outreach methods. However, coordination and communication with CBOs and local contractors that already serve low income and other marginalized communities is a key method to improve penetration into these neighborhoods and increase customer participation. Contractors that deliver other low income energy efficiency programming, such as the Low Income Usage Reduction Program (LIURP), the Low Income Home Energy Assistance Program (LIHEAP) emergency furnace repair services, the Weatherization Assistance Program (WAP), and Whole Home Repairs, often under contract to a CBO, are critical community liaisons. They understand the underlying structural and health and safety issues that an older home faces, as well as the distinct history and cultural nuances of the

community. Coordinating with CBOs and contractors that are already steeped in the community can increase program success in recruiting participants, lowers administrative costs for the EDCs, as well as streamlines coordination of low income energy efficiency programs and maximizes ratepayer dollars towards these programs.

Beyond directly administering Act 129 programming through local contractors, there are a host of other ways that EDCs can partner with and glean wisdom from CBOs and local contractors, including but not limited to:

- Inviting CBOs and local contractors to participate in stakeholder meetings and working groups;
- Co-hosting community outreach and tabling events to make community members aware of programs and other local opportunities for assistance;
- Developing streamlined referral processes;
- Deploying advanced data sharing arrangements to streamline application, eliminate duplicative paperwork, and coordinating auditing;
- Developing a survey for CBOs and local contractors located within the EDC's service territory in order to improve delivery of not only Act 129 services, but other customer assistance programs as well.

The Low Income Advocates encourage the Commission to direct the EDCs to discuss their approach to engaging community-based organizations to serve as CSPs for outreach and program delivery of low income focused programs and/or in disadvantaged communities. EDCs should be required to describe attempts to contract or otherwise coordinate services with CBOs within their Phase V Plans, and should indicate whether they attempted to contract with CBOs as CSPs and whether that attempt was successful. EDCs should also indicate the extent to which any of their selected CSPs are subcontracting with CBOs to deliver Act 129 programs. If an EDC is not utilizing a CBO, it should explain why – and detail efforts to otherwise coordinate with local CBOs in the deliver of Act 129 programming.

**4.4.4** *Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.*

The Low Income Advocates support the specific recognition of the need to address health and safety issues. We recommend that the Commission add the following language to this section: *“Identify whether any programs will provide basic health and safety measures or services.”*

Identifying which EDC programs will directly address health and safety barriers, and describing how the programs propose to do that, allows EDCs to learn best practice strategies from one another. This reporting strategy also underscores critical health and safety programming in the Commonwealth that allows Act 129 programming to reach those that need it most. The Low Income Advocates also recommend the Commission specifically require EDCs to identify other organizations and programs operating within their service territories that provide remediation and repairs of existing health and safety issues and to discuss how the EDC will coordinate its programs with such organizations and programs to increase the reach of its Act 129 EE programming.

## **5. Reporting and Tracking Systems**

As noted earlier in our comments, strategic data sharing can help facilitate enhanced program coordination and, when accomplished with customer-informed consent and data protective measures in place, can provide a host of benefits to both customers and EDCs. While the Commission established a working group to further explore this critical issue, it did not include any provisions within the proposed template requiring EDCs to detail how data sharing may be utilized in Phase V to streamline program delivery or otherwise enhance service delivery.

The Low Income Advocates recommend that the Commission request more specific information from the EDCs regarding data sharing. Specifically, we recommend the Commission include an additional subpart within section 5 requiring the Commission including:

- The extent to which EDCs intend to pursue data sharing arrangements, and the entities with which it intends to pursue such arrangements;

- The method the EDC proposes to obtain consumer consent to share data or otherwise confirm that consent was obtained prior to disclosure of consumer data;
- The nature and type of data intended to be shared;
- The purpose of each proposed data sharing arrangement;
- The intended use for the shared data;
- The security provisions in place to protect consumers from unauthorized disclosure; and
- Identification and disclosure of any data sharing agreements already in place or that are being negotiated/discussed with other utilities, state and local agencies, or third parties.

We believe this information is essential for the Commission to safeguard sensitive consumer data and ensure proper oversight of utility programming.

## **9. Plan Compliance Information and Other Key Issues**

**9.1.3** *Provide a statement delineating how the EE&C plan will achieve the low-income requirements prescribed in the 2025 IO. Additionally, describe any EDC plans to harmonize the Act 129 program delivery with low-income usage reduction programs and other external energy-efficiency, conservation, and healthy housing programs (such as the weatherization assistance program).*

We appreciate the Commission’s inclusion of this coordination provision, though we underscore our earlier recommendations regarding the need for EDCs to add more specificity regarding coordination *at the program level*. A high level of coordination among these unique programs will increase benefits where they are most needed while simultaneously reducing redundant implementation costs. While we support inclusion of this broad, portfolio level section, we nevertheless recommend the Commission also require utilities to include program-level coordination details within the residential and low income program details in section 3.2 and 3.2.1.

**9.1.4.** *Describe how the EDC will ensure that no more than two percent of funds available to implement the plan shall be allocated for experimental equipment or devices. Describe any planned pilot programs in Phase V.*

The Low Income Advocates are concerned with the lack of specificity regarding the required details for proposed pilot programs. The 2% cap on pilot program expenditures represents a relatively small portion of available funds, yet the actual dollar amount devoted to pilot programs is substantial. There is a delicate balance to be struck to ensure EDCs are afforded the flexibility

needed to test new technologies and program delivery methodologies, while ensuring an appropriate level of oversight to ensure the pilot programs are reasonably cost effective and reasonably designed to test the viability of future programs. As such, we recommend that the Commission require EDCs to identify quantifiable metrics and benchmark achievements that it will use to assess whether the pilot program is successful and should be integrated into the Phase V Plan.

**9.2.3. *Describe how the EDC will address consumer education for its programs.***

The Low Income Advocates are concerned that consumer education is included as an “other issue” – rather than a key component of each program. As discussed throughout our comments, there are broad variations in consumer needs – even within a pre-defined customer segment – that necessitates a varied approach to education and outreach. We strongly recommend that the Commission require EDCs to describe efforts to educate each sector (e.g., residential, low income, small C&I, and large C&I) – as well as segments within each sector (e.g., tenants and homeowners; single family, multifamily, and manufactured homes; etc).

### III. CONCLUSION

The Low Income Advocates appreciate the opportunity to comment on the proposed Phase V Template. We believe that the adoption of the above recommendations will help ensure an appropriate level of detail and specificity is included within each EDC's Act 129 Plan.

Respectfully submitted,

*On Behalf of CAUSE-PA*



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**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**Certificate of Service**

I hereby certify that I have this day served copies of the **Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN) on the Act 129 Energy Efficiency and Conservation Program – Phase V Energy Efficiency and Conservation Plan Template** upon the parties of record in the above captioned proceedings in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA Email**

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