



September 15, 2025

Email Submission

**Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101**

**Re: Regulation #57-340: Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1—58.18
IRRC Number 3387; PUC Docket Number L-2016-2557886**

Dear Commissioners:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), by and through its counsel at the Pennsylvania Utility Law Project (PULP), respectfully submits the following comments on behalf of Pennsylvania’s low-income energy consumers in support of the Public Utility Commission’s (PUC) Final Rulemaking revising the existing Low Income Usage Reduction Program (LIURP) regulations.

CAUSE-PA supports the final-form rulemaking and encourages the Independent Regulatory Review Commission (Commission) to approve these reforms to the LIURP regulations. LIURP is a vital universal service program that helps to lessen deep and longstanding disparities in home energy burdens, to improve health, safety, and home comfort, to conserve energy, and to reduce universal service program costs. The revisions to the LIURP regulations in the final-form rulemaking promote the public interest by providing critical updates to LIURP that would reduce barriers to access for low-income energy consumers while advancing the PUC’s statutory charge to ensure that LIURP services are accessible and appropriately funded to help low-income consumers maintain energy services to their homes.

Pennsylvania’s low-income households carry the highest energy burdens – the proportion of their income spent on energy costs – with the fewest economic resources available to address those burdens without assistance. But the impact is not limited to economically vulnerable families – unaffordable energy bills for low-income households also contribute to the overall cost of energy for all Pennsylvanians through increased uncollectible accounts and unnecessarily high programmatic costs. The importance of the LIURP regulations is paramount, as the effective design and implementation of LIURP can help meaningfully reduce the energy burden of low-income

individuals and families, ultimately contributing to the decrease in costs for ratepayers of all income levels. CAUSE-PA supports this final-form rulemaking, as it offers crucial updates to the framework that guides how LIURP is implemented that would make the program more accessible, enhancing its effectiveness in delivering meaningful energy bill savings to consumers.

In comments to the proposed rulemaking, CAUSE-PA offered support for the PUC's efforts to memorialize the inclusion of health, safety, and home comfort measures within the LIURP regulations and to promote coordination between LIURP and other energy efficiency and assistance programs to streamline the delivery of program services. CAUSE-PA urged the PUC to eliminate proposed reforms that would limit the review of LIURP budgets to quinquennial Universal Services and Energy Conservation Plan (USECP) proceedings and to retain language proposed for deletion that prevents landlords from raising rents or evicting low-income tenants for one year after LIURP measures are provided to the tenant household. CAUSE-PA further urged the PUC to add space-cooling wherever there are references to space-heating to account for the urgent need for comprehensive usage reduction services, inclusive of building shell measures, designed to reduce rising cooling costs.

In the final-form rulemaking, the PUC eliminated language that would have limited the review of LIURP budgets to USECP proceedings, reversed the proposal to eliminate existing language that protects tenants who receive LIURP services, incorporated references to space-cooling throughout, and enhanced utilities' ability to better incorporate health and safety measures into their LIURP programming.

CAUSE-PA proposed a number of additional reforms that the PUC did not adopt in its final-form rulemaking, including prioritization for vulnerable households, improved tenant eligibility, and clarified fuel switching rules. Nevertheless, CAUSE-PA believes that the adopted changes are reasonably balanced to address a multitude of needs and interests and will promote the public interest by expanding access to LIURP. The changes included in the final-form rulemaking are encouraging and will improve the ability of low-income ratepayers to access program services and engage as stakeholders in ongoing review of LIURP program design. As such, CAUSE-PA supports this final-form rulemaking and urges approval without delay.

Respectfully submitted,



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CC: Matthew L. Homsher, Secretary, Pennsylvania Public Utility Commission
Filed to PUC Docket No. L-2016-2557886 via e-file