

VIA eFILE

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

**Re: Petition of PECO Energy Company for Approval of its Act 129 Phase V
Energy Efficiency and Conservation Plan
Docket No. M-2025-3057328**

**Duquesne Light Company Phase V Energy Efficiency and Conservation Plan
Docket No. M-2025-3057325**

**Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase V
Energy Efficiency and Conservation Plan
Docket No. M-2025-3057329**

**Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V
Energy Efficiency and Conservation Plan
Docket No. M-2025-3057327**

Dear Secretary Homsher,

The undersigned environmental, energy efficiency, consumer, housing, business, and faith-based organizations (collectively herein, Energy Advocates) submit the following joint comments and recommendations regarding the Energy Efficiency & Conservation (EE&C) Plans submitted by Duquesne Light Company (DLC), FirstEnergy PA (FE PA), PECO Energy Company (PECO), and PPL Electric Utilities Corporation (PPL). We recognize that each Electric Distribution Company (EDC) submitted an individual EE&C Plan, and that each Plan is filed at a separate docket. However, given the short comment period and its overlap with the winter holiday season, we are filing unified comments in response to all four plans, drawing attention to areas of concern in each plan.

Many of the undersigned organizations submitted comments regarding the Commission's Tentative Implementation Order, through which we urged the Commission to be more directive in its guidance for Phase V programs to improve program coordination and ensure the delivery of deeper, long-lasting efficiency measures to address rising energy unaffordability and help reduce emissions. Unfortunately, in our estimation, the EDCs' proposed program portfolios are overly reliant on low-cost, short-term measures that fail to deliver enough substantial, meaningful energy and bill savings over the long term. The EDCs also fail to

advance proposals to meaningfully improve coordination across other efficiency and home repair programs administered by the EDC, by other gas and water utilities in their service territory, and by local and state-level weatherization, efficiency, and home repair programs.

Act 129 programs must be better integrated and cross-coordinated with other related programs in order to leverage overall impact and funding, with a key focus on prioritizing deep measures that resolve health and safety issues and holistically address the energy efficiency and weatherization needs of Pennsylvania's families and businesses.

Comprehensive Programming

The Energy Advocates strongly support the delivery of comprehensive energy efficiency measures through Act 129 programs that provide deep and lasting impacts to reduce whole-building energy use over the long term. While light touch and short-lived measures, like lightbulb and power strip kits, may be cost-effective for a company and easily distributed to many households at once, these measures do not create meaningful impacts on energy savings, energy bills, home health and safety, or grid resiliency. Lightbulbs and power strips are an ineffective bandage on a home that has drafty windows, poor insulation, and old appliances. Additionally, deeper measures like HVAC and whole home retrofits make energy more affordable for customers. One study found that when homes in the Mid-Atlantic region replaced current electric resistance systems with heat pumps, customers' annual savings were around \$459 per year (3,000 kWh).¹

Overall, the EDCs propose relatively few comprehensive, deep-savings measures in their Plans. DLC estimates that it will hand out nearly 14,000 power strips.² In contrast, DLC proposes providing only 174 of its customers with air sealing services.³ Likewise, PECO expects to distribute over 423,000 low-flow showerheads.⁴ Meanwhile, between its Residential and Low Income programs, the Company expects to install just 3,700 heat pump water heaters.⁵ This is a

¹ Northeast Energy Efficiency Partnerships. (2014). *Northeast/Mid-Atlantic Air-Source Heat Pump Market Strategies Report*.

https://neep.org/sites/default/files/resources/NortheastMid-Atlantic%20Air-Source%20Heat%20Pump%20Market%20Strategies%20Report_0.pdf

² Duquesne Light Company. *Duquesne Light Company Phase V Energy Efficiency and Conservation Plan*. Docket No. M-2025-3057325. Submitted to the Pennsylvania Public Utility Commission, December 1, 2025. Pg 153.

³ *Ibid.*, 153.

⁴ PECO Energy Company. *Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*. Docket No. M-2025-3057328. Submitted to the Pennsylvania Public Utility Commission, December 1, 2025. PG 38-39, 79-80.

⁵ *Ibid.*, 46-47, 84.

common pattern with all four EDCs, with FE PA planning to give out 52,500 LED nightlights⁶ and PPL planning to distribute over 163,000 LED nightlights⁷ and very few deeper savings measures.

In short, EDCs should be spending their Act 129 budgets on the delivery of program services that are thorough, durable, and deliver lasting benefits to their customers. The Commission's final Implementation Order agreed with the need for comprehensive services, maintaining its decision that EDCs must include "at least one comprehensive program for residential customers and at least one comprehensive program for non-residential customers," and recognized stakeholder interest in "the installation of comprehensive, longer-lived, deeper-savings measures."⁸ The Commission nevertheless afforded the EDCs a great deal of discretion in how to meet these broader objectives within their individual Plans and no notable improvement of the proportion of deep measure installation to light-touch measure installation was achieved by any EDC. We urge the Commission to require the EDCs to revise their Plans to reduce the focus on lightbulbs and power strips and include a greater focus on deeper, more durable energy savings measures.

Health and Safety Pilot Programs

Pennsylvania's low income families are more likely to live in older homes and are more often than not unable to access Act 129 programming due to significant health and safety issues, such as roof leaks, mold or moisture issues, presence of asbestos and/or lead-based paint, and more. Low income families have a disproportionately higher energy burden than the average residential customer, and thus have the most benefits to gain from energy efficiency services that would lead to a healthier home and lower energy bills.

We are encouraged by the decision of PECO and PPL to include health and safety pilot programs within their Phase V Plans to help improve service delivery to those most in need of

⁶ FirstEnergy Pennsylvania Electric Company. *Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan*. Docket No. M-2025-3057327. Submitted to the Pennsylvania Public Utility Commission, November 26, 2025. Appendix B, at 3 and 10.

⁷ PPL Electric Utilities Corporation. *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*. Docket No. M-2025-3057329. Submitted to the Pennsylvania Public Utility Commission, December 1, 2025. Pg 41, 90. (Please note that PPL also has Student Energy Efficiency Events where they give out additional LED nightlights. These make up a minor percentage of the total nightlights distributed and were not included in the calculations.)

⁸ Pennsylvania Public Utility Commission. *Energy Efficiency and Conservation Program Implementation Order*. Docket No. M-2025-3052826. Submitted by the Pennsylvania Public Utility Commission, June 18, 2025. Pg 52.

services. PECO has designed its Residential Program “to accommodate spending up to \$3 million to address health and safety barriers that prevent low-income customers from installing energy efficiency measures, such as mold, electrical and structural issues. Health and safety funding will be used when an opportunity for installing a specific energy efficiency measure is identified but deemed infeasible due to the presence of a health and safety hazard.”⁹ PPL continues to build on its successful Phase IV Health & Safety pilot, committing “up to \$1.5 million for health and safety repairs and/or upgrades needed to install comprehensive measures.”¹⁰

We encourage all EDCs to develop and invest in health and safety pilot programs that could meaningfully increase the number of customers who are able to access Act 129 programs. The households who are most in need of energy efficiency and conservation programming are more often than not deferred or refused services due to health and safety issues in their home.

Coordination

Amidst skyrocketing cost of living expenses and federal funding uncertainty, it is more critical than ever for government agencies and efficiency program managers to be in close communication in order to braid limited funding resources to fully address the energy efficiency needs of a home. There are a number of federal, state, local, and utility company-run energy efficiency, weatherization, and home health and safety programs serving Pennsylvania families, but few are collaborating with sufficient depth and frequency to properly call it “coordination.”

As explained below, the EDCs’ proposed Phase V Plans each reference an intent to coordinate with complementary programs, but most fall short of providing tangible examples of how they intend to coordinate service delivery. We note that providing generalized referrals to other available programs is not coordination. Coordination requires programs work in tandem to prevent duplication of services, reduce administrative expense, improve consumer experience, and leverage improved outcomes for program participants.

DLC committed to referring confirmed low income customers who participate in its general residential programs to its Act 129 low income-specific programs, as well as its Universal Service Programs, including Low Income Usage Reduction Program (LIURP) and the

⁹ PECO Energy Company, *Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*, 9-10.

¹⁰ *Ibid.*, 79.

annual Low Income Home Energy Assistance Program (LIHEAP) program. The Company will also coordinate with local natural gas distribution companies (NGDCs) and community-based organizations as applicable.¹¹ We applaud DLC for including a specific list of community partners it intends to coordinate with for its Act 129 Low-Income Energy Efficiency Program (LIEEP).¹² The Energy Advocates encourage each of the EDCs to identify specific community partnerships they intend to draw on to promote and/or deliver Act 129 services, and to in turn commit to building relationships with others in their service territories throughout Phase V. We are also pleased with DLC's stated intent to coordinate its LIEEP with LIURP - allowing LIURP to help fill in the gaps to provide deeper measures and to assist with incidental repairs and health/safety remediation through the use of a common contractor.¹³ All EDCs should be encouraged to facilitate coordination across contractors and potentially utilize common contractors to help ensure appropriate leveraging of scarce resources across Act 129 and LIURP programs - as well as other local, state, and federal programs that provide home repair, weatherization, efficiency, and other adjacent services. All EDCs should look to improve Act 129 program reach by partnering with agencies and service providers that are already providing similar adjacent services in the home to deliver Act 129 measures. For example, this level of partnership could take the form of allowing a weatherization service provider to install high efficiency equipment through Act 129 as part of a weatherization job - helping leverage federal funds and Act 129 programs to improve the number of measures installed in the home and, in turn, improve the level of energy and bill savings achieved for individual households. This kind of coordination could lead to more comprehensive efficiency jobs - while improving the reach of Act 129 measures through trusted community partners. We note that this sort of coordination across agencies would require careful consideration and protocols for billing these services, responsibility for reporting EE measure and calculating savings under Act 129, clarification of any shift in legal liability and call-back responsibility based on party who actually installs the appliance, and any effort to ensure unified training, credentials and qualifications across implementors' contractors and agency staff.

FE PA generally requires its contractors to coordinate with other state, federal, and utility programs in order to braid funding,¹⁴ and commits to efficient program referrals and contractor

¹¹ Duquesne Light Company, *Duquesne Light Company Phase V Energy Efficiency and Conservation Plan*, 40.

¹² *Ibid.*, 20.

¹³ *Ibid.*, 77.

¹⁴ FirstEnergy Pennsylvania Electric Company, *Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan*, 61.

leveraging when appropriate.¹⁵ The Company also lists a number of key partners in its coordinated marketing strategy,¹⁶ and its website application process asks for a customer's NGDC information and consent to share customer information with the NGDC,¹⁷ allowing eligible customers to more easily sign up for assistance programs at both of their utility companies. Indeed, we strongly encourage other EDCs to mirror these two practices. Unfortunately, FE PA does not provide much further detail about their coordination practices and we urge them to make more specific commitments to improving this area of their program design. Specifically, we strongly recommend the use of common contractors when possible and to facilitate coordination and increased program alignment to support common contractors, and encourage FE PA to leverage local service providers that work directly with low income households to help improve program reach.

Like FE PA, PPL did not go into much detail throughout their plan about their coordination efforts. However, they do outline their single application which assigns a customer to either its Act 129 Resource Constrained Energy Efficiency Program or LIURP depending on the customer's eligibility. PPL explains that this allows for a *reduction* in contractor visits to the customer's home and stretches program funding farther - though PPL does not say whether it will still send multiple contractors to the same home if the household is eligible for both Act 129 and LIURP.¹⁸ While the use of a single application is a critical first step to coordination, and a best practice that each EDC should strive to adopt, we note that PPL can take further steps to coordinate the delivery of its Act 129 and LIURP programming through better coordination across contractors for scheduling visits and aligning services delivered to the same dwelling unit. We are further concerned that PPL does not intend to coordinate with additional local, state, and federal programs to deliver Act 129 measures through alternative channels, leaving augmenting funds and improvements disjointed from Act 129.

Lastly, PECO claims that it is exploring collaborations with other initiatives in its service territory, such as aligning its electric energy efficiency programs with its gas efficiency programs and braiding funding with Inflation Reduction Act (IRA) programs,¹⁹ but does not provide much further detail or commitment to improving coordination efforts throughout its Plan. The testimony

¹⁵ Ibid., 62.

¹⁶ Ibid., 64.

¹⁷ Ibid., 54.

¹⁸ FirstEnergy Pennsylvania Electric Company, *Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan*, 61.

¹⁹ PECO Energy Company, *Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*, 12-13.

of Urmila Dighe, Senior Manager of PECO's Energy Efficiency Portfolio, argues that changes to federal funding policies and standards limits potential coordination partnerships.²⁰ We understand Ms. Dighe's concerns, but we encourage her and the rest of PECO's energy efficiency program staff to use these federal changes as an opportunity to build stronger comprehensive trade ally networks and partnerships with both private sector firms and existing community-based organizations within their service territory - many of which have successfully delivered home repair, weatherization, and other adjacent services for many decades. For example, the Philadelphia Energy Authority's Built to Last Program and the Philadelphia Basic System Repair Program operate within PECO's service territory to deliver coordinated home repair and efficiency services. PECO should coordinate directly with a full, industry-wide trade ally network that can include established weatherization, home repair, and efficiency programs across its service territory.

As all of the EDCs are well aware, energy costs are on the rise - causing an increased strain on Pennsylvania households. It's imperative that companies show sincere effort to partner with their communities to keep households connected and to improve bill affordability. Leveraging these relationships through cross-coordination may also bridge a much needed gap between residents and trusted community organizations to assist in educating and unlocking more participation in these sometimes difficult to access and understand programs. Speaking to this, via an anonymous, informational survey conducted by the Clean Air Council, an anonymous respondent highlights the need for better access and education on utilizing these programs:

"Finding these assistance programs is its own job. It's so time consuming to access and apply for these that working people can't devote enough time to figuring it all out. These have to be made easier if we're actually going to help working class people. People who need the most assistance have the hardest time getting it. It can be a barrier to have things online for the disabled and elderly. I have a friend who is disabled who goes to the library or his state rep's office for assistance filling out forms and bills. That's a lot to ask someone to do just to access programs the law says they should have access to."²¹

It is more critical than ever for EDCs to be in close communication with and responsive to their communities and the organizations that represent them.

²⁰ Ibid., 11.

²¹ *Anonymous Respondent*, Clean Air Council 2025 Anonymous Act 129 Survey.

Conclusion

The Energy Advocates are grateful for the opportunity to provide these comments, as well as our previous set of comments in response to the Phase V Tentative Implementation Order and additional comments submitted throughout the Phase V implementation timeline by our individual organizations. Multiple opportunities for public input, as well as transparent communication by the presiding government agency as to whether or not the input can be meaningfully incorporated, is a cornerstone of healthy democracy. We look forward to continuing to be in communication with the Commission throughout the remainder of Phase IV and look forward to the start of Phase V on June 1. We believe that energy efficiency is a critical tool in Pennsylvania's toolbox to ensure that all its inhabitants can afford their energy bills, alongside improving statewide electric grid resiliency and public health outcomes. Act 129 has provided substantive long-term energy efficiency benefits to Pennsylvanians since its passage in 2008, and our organizations remain dedicated to assisting in its success throughout future Phases.

Signed,

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