



January 18, 2026

Before the Pennsylvania Public Utility Commission

Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase V Plan Docket No. M-2025-3057325

Petition for Approval of the Phase V Energy Efficiency and Conservation Plan of FirstEnergy Pennsylvania Electric Company Docket No. M-2025-3052826

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

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

Via electronic filing

Clean Air Council Comments Re: Act 129 Phase V Energy Efficiency and Conservation Plans

Clean Air Council (the Council) submits the following comments in response to the Act 129 Phase V Energy Efficiency and Conservation (EE&C) Plans filed with the Public Utility Commission (PUC). Clean Air Council is a member-supported environmental organization serving Pennsylvania and the surrounding regions. The Council is dedicated to protecting everyone’s right to a healthy environment. The Council works through a broad array of sustainability and public health initiatives, including public education, community action, government oversight, and enforcement of environmental laws.

Introduction

Energy demand in Pennsylvania has skyrocketed in the last year, due in large part to the buildout of hyperscale data centers. This demand, coupled with a longstanding failure of the regional grid operator, PJM, to interconnect shovel-ready renewable energy capacity has resulted in an increasingly-dire energy crisis. According to the Independent Fiscal Office, the price to compare for the three largest Pennsylvania utilities between June and November of 2025 was between 11.1% and 24.4% higher compared to the

same period in the prior year.¹ The most recent PJM capacity market auction in December 2025 not only bumped against the price cap determined by Governor Josh Shapiro's settlement with PJM, it also failed to procure enough supply to meet expected demand in 2027.² In other words, Pennsylvanians will be on the hook for the \$16.4 billion capacity bill, paying more for energy despite a gap in supply and potential demand.

Improving energy efficiency is critical to buffering Pennsylvania ratepayers from rising costs and reducing overall demand, especially during summer and winter peak periods. Furthermore, 60% of the Commonwealth's electricity is generated from fracked gas, resulting in Pennsylvania being the state with the third-highest carbon emissions attributable to gas-fired power generation.³ Greenhouse gases, such as carbon dioxide, worsen climate change and fuel extreme heat and extreme weather events, which only further burden Pennsylvania ratepayers with costly power outages and repairs. Reducing energy usage through improved efficiency has the potential to improve air quality, protect human health, curb climate-warming pollution, and safeguard electricity distribution infrastructure.

As Pennsylvania's flagship energy efficiency program, Act 129 sets a framework for large electric utilities in the state to meet energy efficiency and demand reduction goals. Act 129 has saved Pennsylvania electric ratepayers \$6.4 billion in energy costs since 2009.⁴ Planning for Phase V of Act 129 comes at a pivotal moment where energy costs are increasingly becoming unaffordable, extreme weather fueled by climate change is devastating communities across the state and country, and energy demands are outpacing existing supply.

Implementing robust energy efficiency plans over the next five years will be key to protecting ratepayers. The Council urges the Commission to require electric utility companies (EDCs) to prioritize the following areas in their EEE&C planning prior to approval:

- Improve program information and marketing
- Enhance coordination with relevant programs
- Better coordinate LIURP for eligible customers
- Improve heat pump education and access
- Prioritize measures that offer deep energy savings

¹ Independent Fiscal Office. (2025, August). *Residential Electricity Bills Begin Surge*.

https://www.ifo.state.pa.us/download.cfm?file=Resources/Documents/RB_2025_08_Electricity%20Prices.pdf

² *PJM Auction Procures 134,479 MW of Generation Resources*. (2025, December 17). PJM Inside Lines.

<https://insidelines.pjm.com/pjm-auction-procures-134479-mw-of-generation-resources/>

³ Independent Fiscal Office. (2025, February). *Pennsylvania Electricity Update*.

https://www.ifo.state.pa.us/getfile.cfm?file=Resources/Documents/RB_2025_02_Electricity.pdf&view=true and

Clearing the Air: The need and opportunity to reduce unhealthy pollution from gas-fired power plants and industrial facilities. (n.d.). Environmental Defense Fund. Retrieved January 17, 2026, from <https://turbinemap.edf.org/>

⁴ *Home Energy Efficiency and Conservation: Financial Incentives*. (n.d.). Commonwealth of Pennsylvania.

Retrieved January 17, 2026, from

<https://www.pa.gov/agencies/dep/residents/saving-energy/home-energy-efficiency-and-conservation/energy-efficiency-incentives>

Over the last three months, the Council has collected anonymous survey responses from Pennsylvania electric customers about their experience with various EDCs' Act 129 programs. Summaries of these responses and select quotes will be presented throughout this comment.

1. Summary of survey responses

The survey conducted by the Council was administered via Microsoft Forms and was shared among members of the Council and other partner organizations' members over a three month period. At the time of drafting, the survey had received 283 unique responses. Of these responses, six were excluded: one respondent was ineligible to participate due to geographical constraints, three respondents were unsure of their EDC, and two respondents were customers of EDCs that are not required to participate in Act 129 (Service Electric and Valley Rural Electric, respectively). 179 respondents (65%) were Duquesne Light Company customers; 34 respondents (12%) were FirstEnergy customers, 46 respondents (17%) were PECO Energy Company customers, and 18 respondents (6%) were PPL Electric Utilities customers. Nearly two-thirds (65%) of respondents reported owning their residence (see Figure 1 in Appendix for the owner/renter breakdown for each EDC).

A majority of respondents (79%) reported being unfamiliar with their EDC's Act 129 program (see Figure 2 in Appendix). This reflects an ongoing opportunity to expand knowledge and awareness of Act 129 programming to help the public understand the energy efficiency options available to them by nature of being a customer of their EDC. The Council recognizes that Act 129 programming within each EDC has its own name and branding. To account for this, the survey was updated to list specific names of each utility's Act 129 program in the question prompt. Even after this change was made to specify the program names, the rate of respondents indicating they were familiar with Act 129 was not significantly different from before the definition was updated.

Despite this reported unfamiliarity with Act 129 programming, customers did indicate taking advantage of certain energy efficiency measures. Among customers who reported utilizing energy efficiency measures offered by their EDC, rebates for energy efficient appliances and energy audits or assessments were most frequently used. Some more comprehensive measures, like weatherization work and work done on heating, ventilation, and air conditioning systems (HVAC) were the least reported measures to be utilized. Notable among the lesser-reported measures was appliance recycling, which was only reported by two respondents. See Figure 3 in Appendix for more information.

2. Improve program information and marketing

Increasing customer awareness of their utility's Act 129 program is a key component to improving customer engagement. This customer education can occur through effective marketing campaigns, coordination with other programs, and comprehensive websites or access points for programs. Indeed, five of 17 respondents who indicated experiencing barriers to accessing their utility's Act 129 program cited lack of information or incorrect information about Act 129 being a factor that prevented engagement. One Duquesne Light Company customer stated about Act 129, "Information is hard to find. There needs to be a clear place to go with clear steps and easy steps." Another Duquesne Light Company customer stated, "I would like to benefit from these programs but didn't know they existed." Other

respondents likened finding utility assistance programs to “its own job,” noting that accessing and applying to programs is time-consuming and stressful.

Among the respondents who had knowledge of their utility’s Act 129 program prior to the survey, individual research and mentions of Act 129 in the media, working in a relevant field, and utility mailers were the most common methods of learning about the program. There is ample room for improvement of utility-led approaches to raising awareness of Act 129 offerings; EDCs should better market existing Act 129 program websites and establish a common portal or website for customers to access all related state and federal conservation programs.

At the same time, EDCs should ensure populations who are less likely to access online resources, such as elderly individuals, are also being adequately served. A respondent who primarily works with elderly people noted that many of them do not have email and do not check mail flyers. This respondent noted that community meetings and phone calls from utilities have been more effective in connecting elderly individuals with appropriate resources.

3. Enhance coordination with relevant programs

Enhanced coordination of Act 129 offerings with other conservation and health and safety programs can both increase awareness of Act 129 and help households avoid deferral due to health and safety concerns during service delivery. When respondents were asked what could help them better access health, safety, and home repair programs if needed, a majority (116) selected, “Having a one-stop website or listing for all state and federal programs.” The second most popular (105) selection was, “Coordinating different programs so that applying to one means you are looped in to other relevant programs.” These responses support the need for a one-stop resource that includes program information for all available energy efficiency and other customer assistance programs, extending even beyond just health and safety resources.

Several of the Phase V EE&C plans proposed by EDCs place the responsibility of sharing co-funding opportunities on contractors, without providing a clear framework for how coordination of programs will be administered. For example, Duquesne Light Company notes that implementing Conservation Service Providers (CSPs) are required to assist customers in completing necessary forms to external funding sources.⁵ Similarly, PPL plans to rely on CSPs to implement coordination with other conservation programs⁶ and FirstEnergy plans to require contractors implementing its low-income programs to coordinate Act 129 service delivery with other conservation programs using “commercially reasonable”

⁵ 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 76.

⁶ 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 196.

efforts.⁷ PECO plans to explore collaborations for cross-program coordination.⁸ The Council urges the PUC to direct EDCs to detail specific plans that actively educate, coordinate, and help customers access conservation programs in conjunction with Act 129.

Federal Inflation Reduction Act (IRA) funds allocated to the Department of Environmental Protection (DEP) for the Home Efficiency Rebates (HER) and Home Electrification & Appliance Rebate (HEAR) programs are another highly anticipated source of funding for improving home energy efficiency. The Council supports efforts by EDCs to collaborate with these DEP programs and co-fund audits as part of larger energy efficiency improvement projects.

The Council is also supportive of PECO Energy Company and PPL Electric Utilities' efforts to formalize health and safety programs that were piloted in their Phase IV EE&C plans, and urges the PUC to encourage other EDCs to similarly fund explicit health and safety programs in their plans.⁹ Pennsylvania's housing stock is some of the oldest in the nation, and low-income residents are more likely to live in older homes that pose health and safety issues.¹⁰ 77 (27%) survey respondents indicated some concern over environmental hazards in the home, which ranged from mold, lead, radon and asbestos, to name a few. These are issues that can prevent homes from receiving proper energy efficiency upgrades, whether through Act 129 or other conservation programs, and limit the benefits of energy efficiency improvements in the Commonwealth.

4. Better coordinate LIURP for eligible customers

The PUC has emphasized the importance of aligning Act 129 programming with EDCs' Low Income Usage Reduction programs (LIURP), which can ideally work in tandem and fill in service gaps for low-income households.¹¹ Coordinating Act 129 programs with LIURP can help achieve deeper energy efficiency savings for low-income households by providing additional weatherization and health and safety improvements. The Council recognizes steps that EDCs are taking to continue delivering coordinated services to low-income customers.

At the same time, feedback from individuals responding to the Council's survey indicated a potential need for enhanced advertising and education of LIURP with low-income families. For example, one Duquesne customer noted, "There needs to be more communication to low income houses [in] reference to what they can be assisted with. I only knew that if they did an inspection they would offer bulbs, strips, and

⁷ 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. Pg 154.

⁸ 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. 12.

⁹ PECO Energy Company. *Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*. Pg 161 and PPL Electric Utilities Corporation. *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan*. Pg 198.

¹⁰ Pennsylvania Housing Finance Agency (PHFA), *Pennsylvania Comprehensive Housing Study* (2020), available at: https://www.phfa.org/forms/housing_study/2020/pennsylvania-comprehensive-housing-study-full-report.pdf.

¹¹ Pennsylvania Public Utility Commission. *Tentative Implementation Order*. Docket No. M-2025-3052826. February 20, 2025. Pg 54

winterization sealing. I never knew there was more.” Another stated, “[Utility companies] should do a better job of advertising WAP and LIURP. Low income families that would benefit from these programs need to know about them or they won’t get anything. These programs are supposed to help people, and they won’t if no one knows about them. Pittsburghers have leaky drafty windows and doors and we’re just supposed to deal with it on our own even though the utility has money to help us.”

Survey respondents who indicated that they were low-income customers were asked whether they were referred to LIURP when they tried to access their utility’s Act 129 program, and whether their utility coordinated the service. Table 1 shows that among the low-income households who did try to access Act 129 programming, a majority of them were not referred to LIURP as another resource and only one individual indicated that they were both referred and had their service coordinated by their utility, Duquesne Light Company.

While these results may not necessarily be representative of broader patterns within each utility, it should be noted that, despite EDC plans and intentions to coordinate Act 129 and LIURP through common contractors and referrals, customers are voicing a need for more targeted education about LIURP. EDCs should be encouraged to detail specifics for how they plan to conduct outreach to low-income customers to increase awareness of utility Act 129 and LIURP offerings.

Table 1: Low-income customers– if you tried to access Act 129, did your utility refer you to LIURP?; If so, did your utility coordinate?

Utility company	Was not referred to LIURP	Was referred to LIURP; Utility <i>did not</i> coordinate	Was referred to LIURP; Utility <i>did</i> coordinate	Not sure	Did not try to access Act 129
Duquesne	14	1	1	3	18
FirstEnergy PA	3			2	4
PECO Energy Company				2	1
PPL Electric Utilities	1				1

5. Improve heat pump education and access

The Council is supportive of the PUC’s requirement of EDCs to include high efficiency heat pumps and heat pump water heaters through HEAR in EE&C plans.¹² Heat pumps can be a highly efficient and cost-effective option to traditional heating and cooling systems, regardless of energy source; a National Renewable Energy Laboratory (NREL) analysis found that between 62% and 92% of American

¹² Pennsylvania Public Utility Commission. *Implementation of Act 129 of 2008—Phase V, Energy Efficiency and Conservation Plan Template*. Docket No. M-2025-3052826. September 8, 2025. At Section 3.1.5.

households could see reduced energy bills resulting from using a heat pump.¹³ Furthermore, because heat pumps do not operate on fossil fuels, they do not emit harmful air pollutants that worsen local and indoor air quality. Braiding Act 129 programs with existing funding sources to promote heat pumps will maximize energy efficiency benefits in the Commonwealth and tackle existing inequities or barriers to access that prevent broader heat pump adoption.

Survey respondents expressed some skepticism and hesitation around heat pumps, although there was interest as well. 40% (110) of respondents explicitly stated they did not want a heat pump, 27% (76) of respondents indicated they would be interested in getting a heat pump, 3% (8) said they have plans to get a heat pump. The remaining respondents either already had a heat pump (12%) or were constrained due to being renters (5%), having concerns over costs (2%), needing more information (3%), or other reasons. This indicates an opportunity for EDCs to further educate the public on the benefits of heat pumps and co-funding opportunities to install heat pumps, while also making heat pump rebate processes as seamless as possible. Figures 4, 5, 6, and 7 in Appendix break down heat pump interest by EDC.

The survey also asked respondents who had indicated they were interested in getting a heat pump or had plans to get a heat pump what barriers they were facing in the process (84 respondents). Even among the respondents who expressed interest in heat pumps, a lack of information about the technology (54%) and cost concerns (36%) were the most commonly-cited barriers that prevented respondents from moving forward. It should be expected that these barriers are even greater for those who are less informed about heat pumps as an option for their home. This hesitation is likely in-part due to decades of marketing, led by the fossil fuel industry, intended to undermine public confidence in heat pumps.¹⁴ EDCs should conduct factual marketing and education to combat and dispel myths around heat pumps. Table 2 in Appendix details the answers that individuals selected; multiple answers were permitted.

Indeed, the responses also show that individuals are aware of existing incentive and rebate programs available for heat pumps, but are finding these programs confusing to navigate or inadequate to cover costs of the heat pump. For example, a Council staff member who did not participate in the survey but is a customer of Duquesne Light Company reported difficulty submitting a rebate for a heat pump water heater, despite the measure being listed on the utility's rebate website. They were instructed to instead photoshop and fill in the Duquesne Light Company's HVAC heat pump rebate form because there was no form specific to heat pump water heaters. Similarly, a FirstEnergy customer stated:

“I would love to see the rebates be easier to figure out and access. It would lessen the load on the grid and my wallet if PA (or any state for that matter) made it easier for their citizens to look up energy efficiency (and renewable energy generation, like solar thermal, PV solar, etc.) rebates/incentives, and then made them easy to obtain. It seems daunting to figure out how to get the right heat pump to modify my existing heating/cooling mix, and then to apply for the rebate.”

¹³ *News Release: Benefits of Heat Pumps Detailed in New NREL Report.* (2024, February 12). National Laboratory of the Rockies. <https://www.nrel.gov/news/detail/press/2024/benefits-of-heat-pumps-detailed-in-new-nrel-report>

¹⁴ See *Laclede Gas commercial feat. Jim Varney.* (1989). [Video recording]. <https://www.youtube.com/watch?v=uwgh821KPPe>

Through Act 129, EDCs can help fill the gap in obtaining heat pumps by improving ease of access to existing rebate programs and better coordinating access to different sources of funding, in particular through the HEAR program. There is also a need for utilities to actively educate customers about heat pumps — how they work, how they can possibly reduce energy bills, and how they improve indoor air quality.

6. Prioritize measures that offer deep energy savings

As energy costs increase for Pennsylvania residents and policy change is slow to come by, energy efficiency improvements become the first line of defense that residents can implement to partially buffer themselves from high energy prices. The Council recognizes the importance of comprehensive energy efficiency measures that confer deep energy savings, and urges the PUC to push EDCs to invest Act 129 dollars in measures that will provide meaningful energy usage reductions.

Efficiency kits have been a tool leveraged by EDCs to provide light-touch measures such as efficient lightbulbs, smart power strips, and low-flow showerheads, to name a few. While swapping to more efficient options may offer some energy savings, these measures are often short-lived and do not help address more systemic issues such as old homes, leaky building envelopes, and other health and safety concerns.

When survey respondents were asked whether they had ever received an efficiency kit from their utility, a majority responded no (57%), 8% of respondents had not heard of efficiency kits before, and 13% were unsure. Figure 8 in Appendix illustrates the breakdown of efficiency kit recipients by EDC. 62 (22%) respondents indicated that they had received a kit. LED lightbulbs (45), nightlights (18), smart power strips (16), and shower heads (8) were commonly-reported items received in the kit. Several respondents noted that they disliked the LED lightbulbs, the most commonly-received item, for a variety of reasons: the lightbulbs did not last long; they did not fit all light fixtures in the home; they did not fit the home's aesthetic; and respondents would rather purchase their own LED lights. Instead of continuing to focus on measures such as energy efficiency kits as a primary method of reducing customers' energy usage, EDCs should dedicate more funding towards comprehensive programs. Doing so can result in greater, long-term energy savings for customers.

Conclusion

The cheapest energy is the energy we do not use, and indeed energy efficiency tends to cost less compared to other unsubsidized energy sources.¹⁵ Energy efficiency is a critical piece to protecting ratepayers from skyrocketing energy bills while also ensuring grid reliability through reducing peak demand. As Pennsylvania's flagship energy efficiency law, Act 129 has been a key tool in guiding EDCs toward funding energy efficiency in the Commonwealth. As such, the Council urges the PUC to ensure EDC Phase V EE&C Plans are as effective as possible and confer real energy savings to customers.

¹⁵ *Energy Efficiency as a Resource*. (n.d.). ACEEE. Retrieved January 17, 2026, from <https://www.aceee.org/topic/energy-efficiency-as-a-resource>

We ask the PUC require EDCs to update plans as needed to **improve program awareness and marketing; enhance coordination with other relevant programs; better coordinate LIURP benefits for eligible customers; educate about and expand on heat pump access; and prioritize measures that offer deep energy savings.**

Phase V planning for Act 129 comes at a critical moment for Pennsylvania ratepayers who have had little reprieve from increasing energy costs. The Council thanks the PUC for prioritizing ratepayer, health, and environmental protections in its review of EE&C plans.

Sincerely,

Alice Lu
Policy Analyst
Clean Air Council
1617 JFK Boulevard
Suite 1130
Philadelphia, PA 19103
alu@cleanair.org

Appendix
Figures and tables

Figure 1
Owner / renter by utility

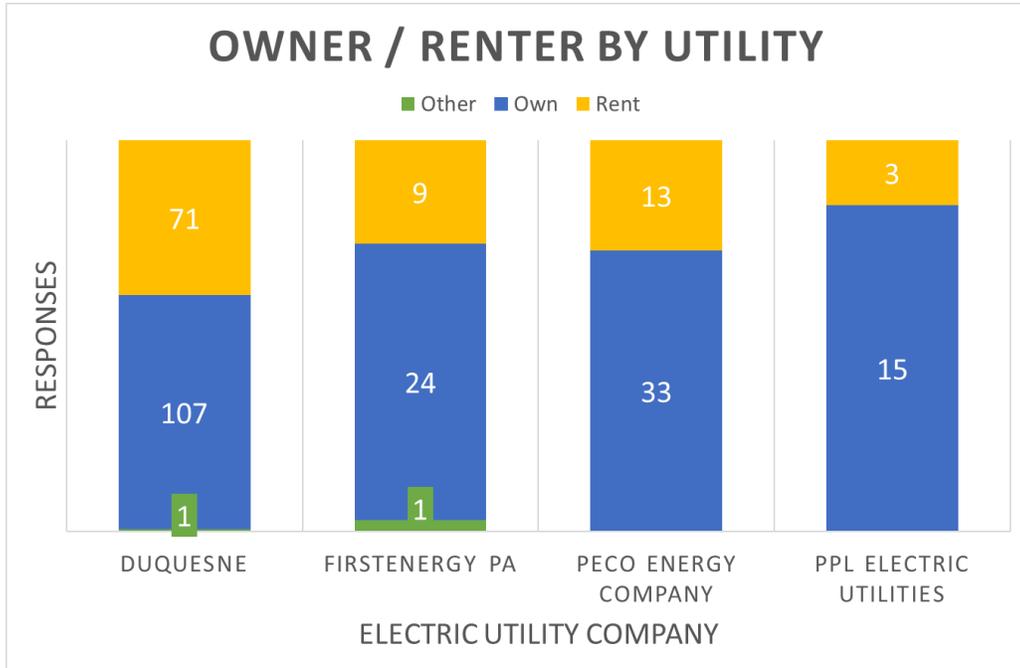


Figure 2
Did you know about Act 129 prior to this survey? By utility

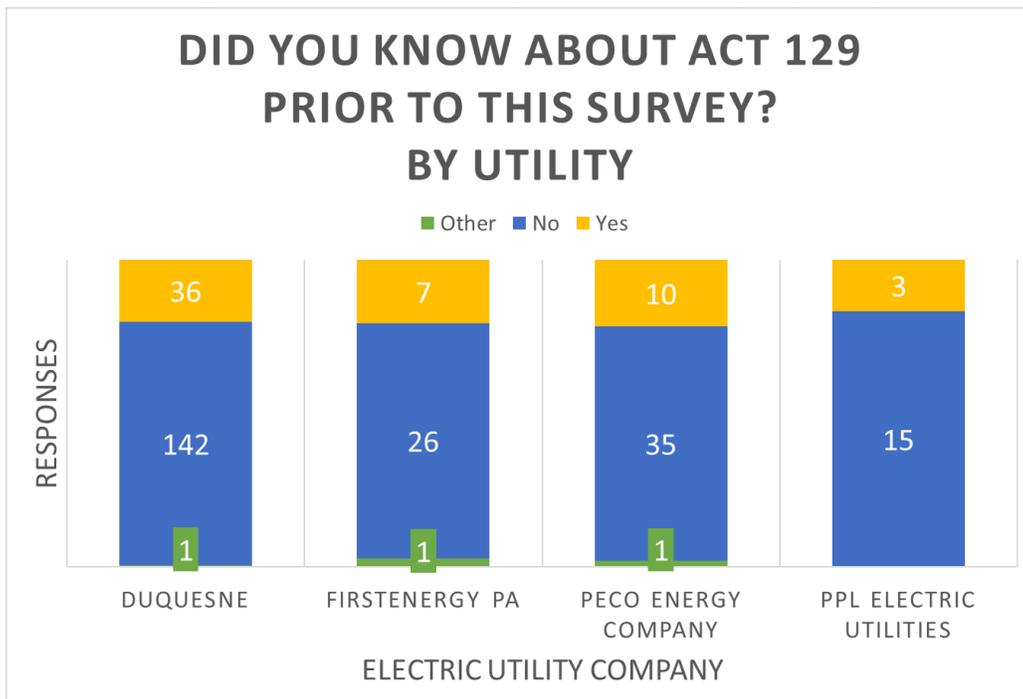


Figure 3

Have you taken advantage of or used other energy efficiency measures offered by your utility?

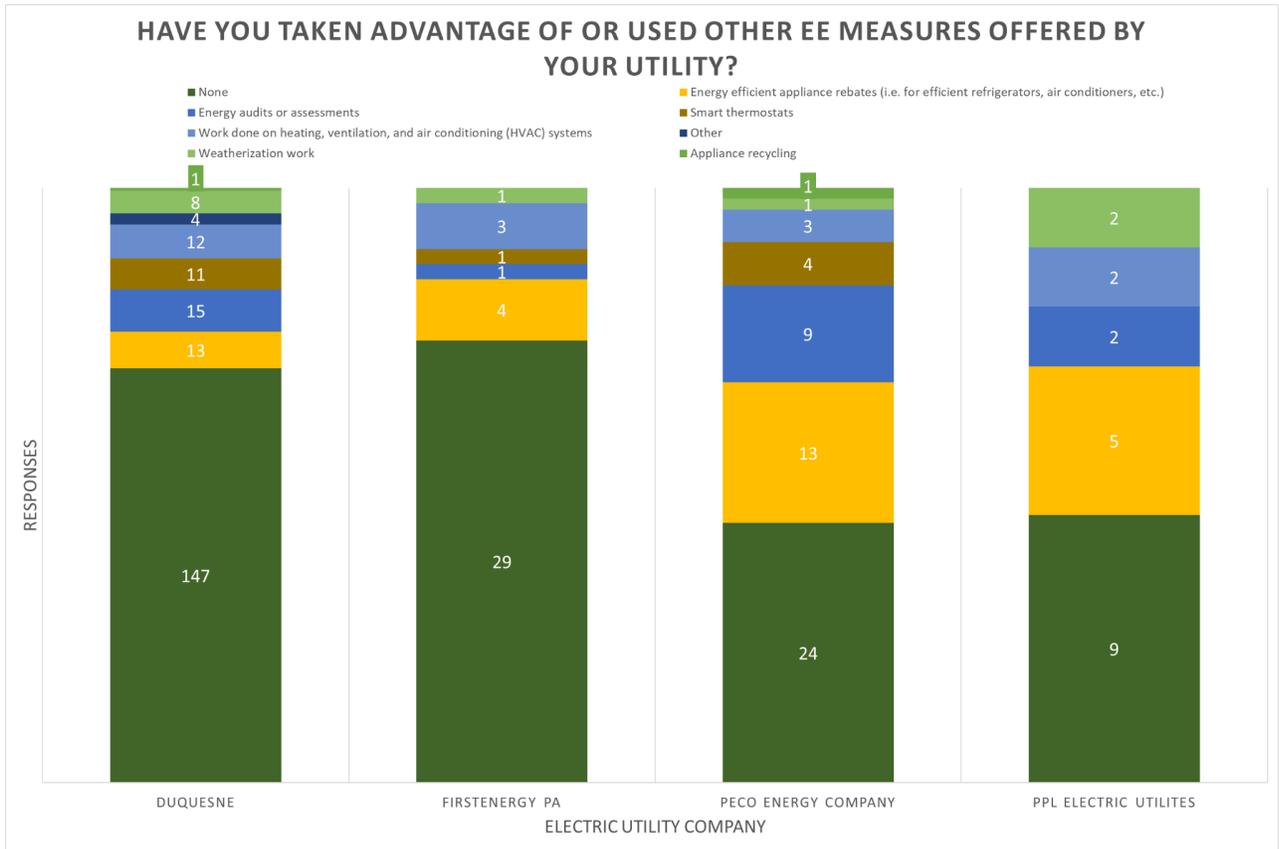


Figure 4
Duquesne Light Company customers: Interest in heat pumps

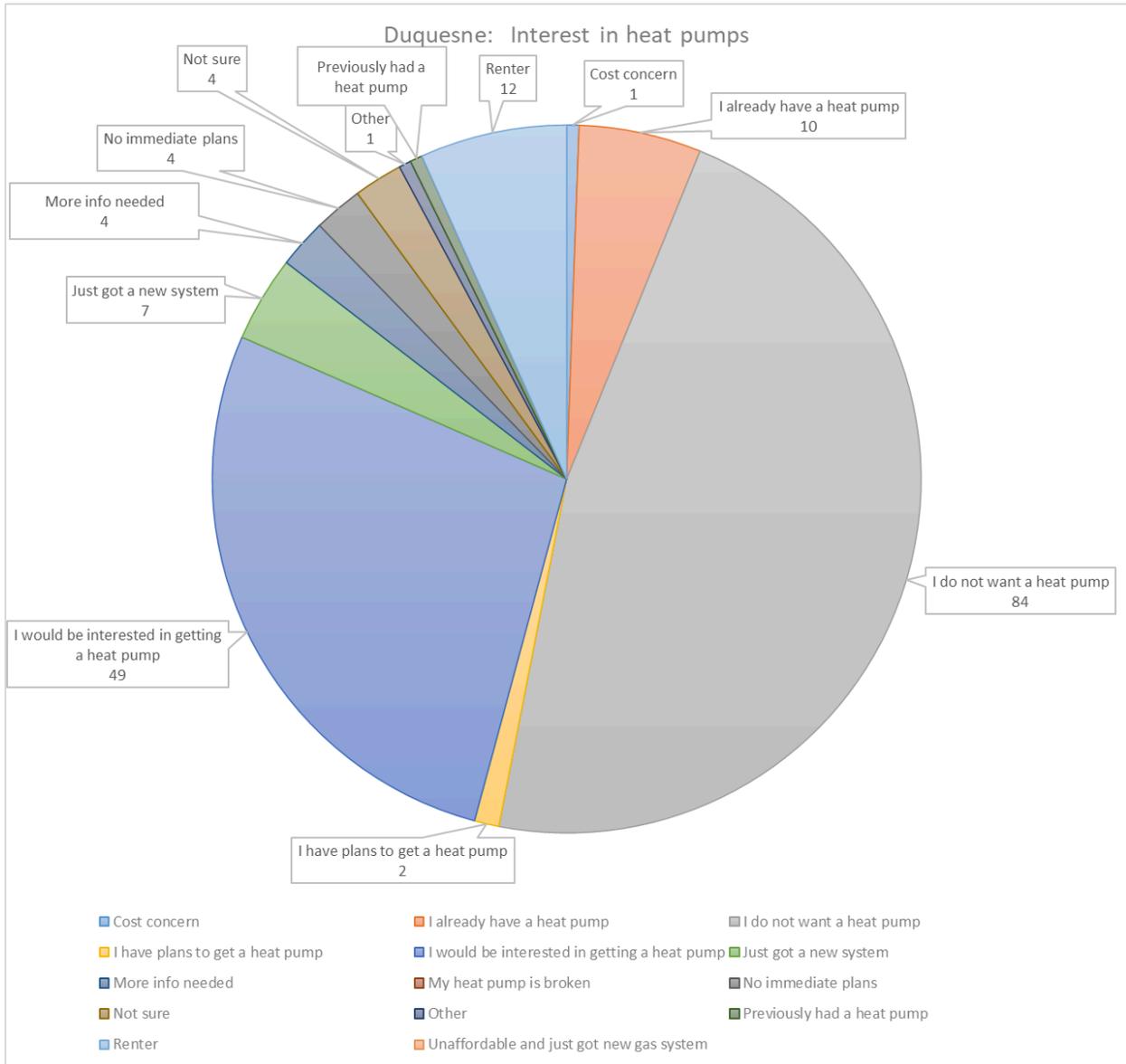


Figure 5
FirstEnergy PA customers: Interest in heat pumps

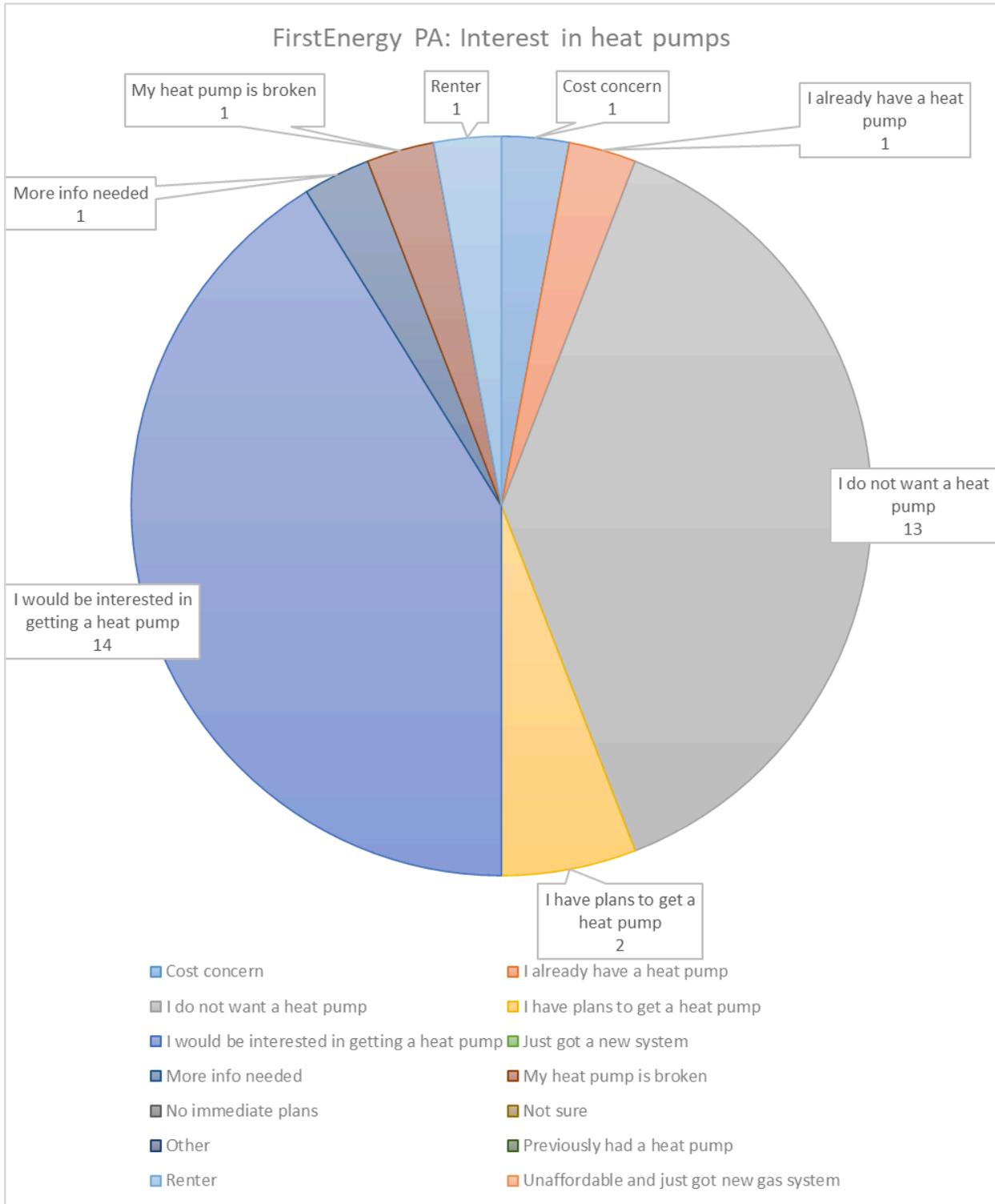


Figure 6
PECO Energy Company customers: Interest in heat pumps

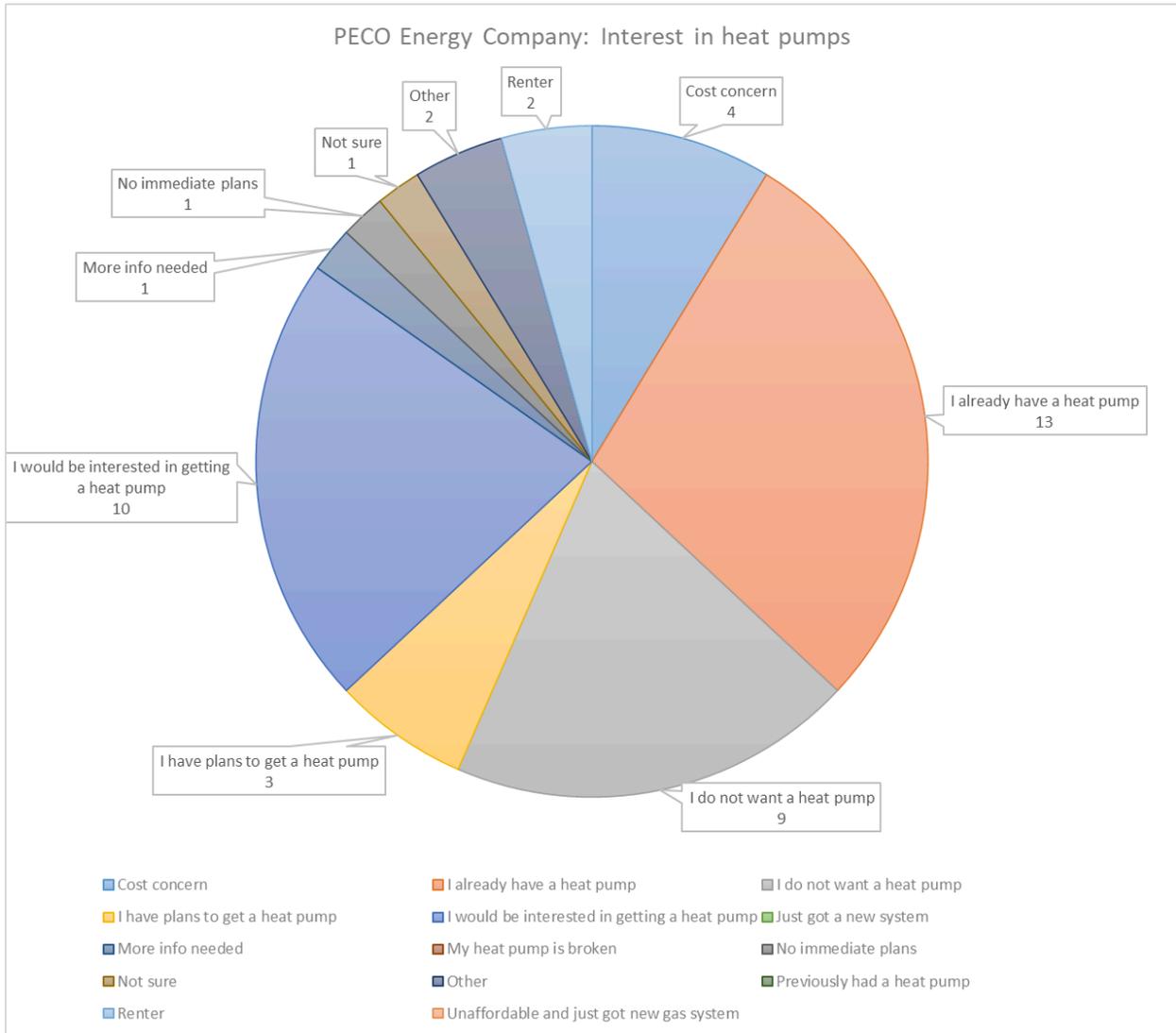


Figure 7

PPL Electric Utilities customers: Interest in heat pumps

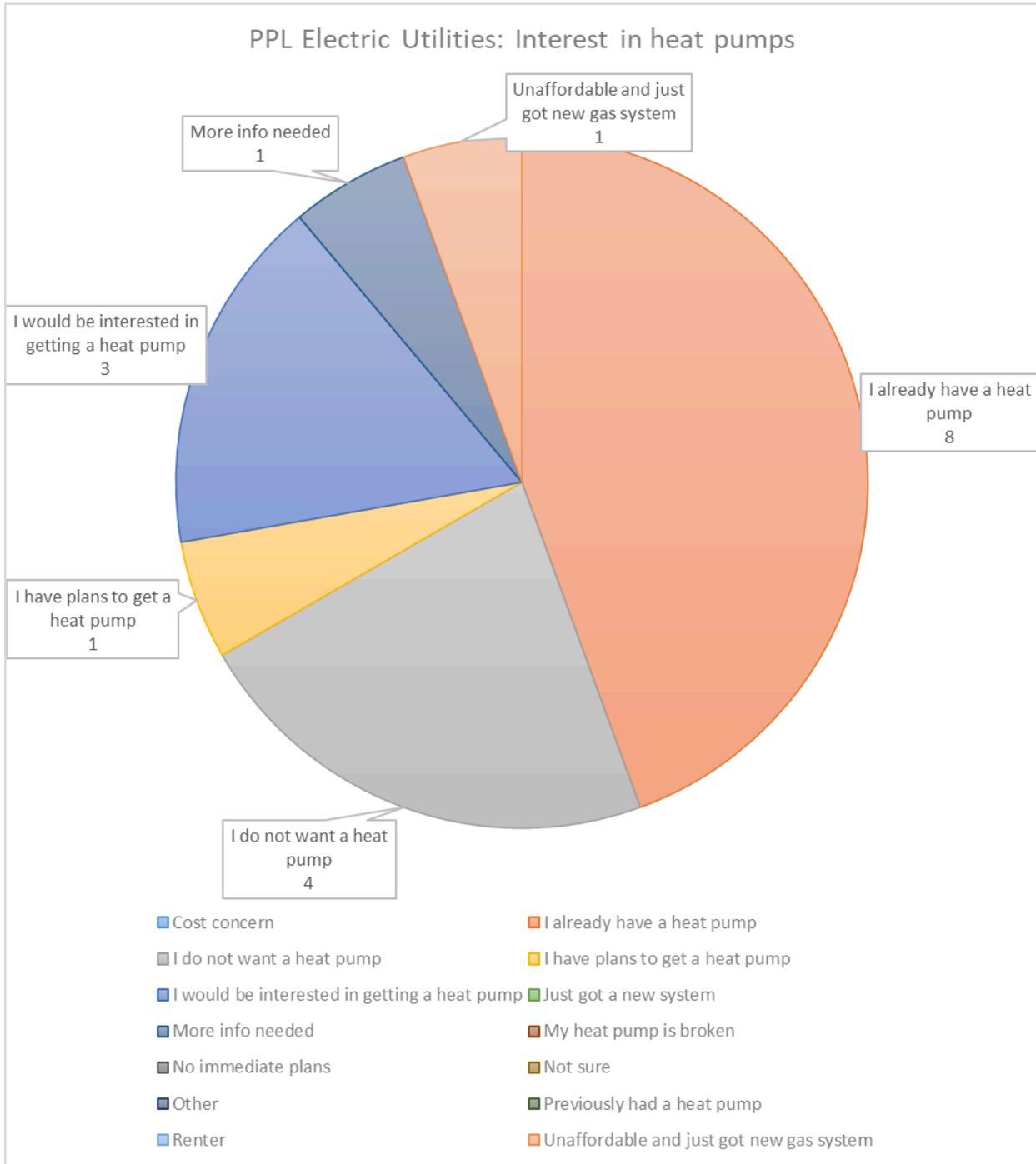


Figure 8
Were you sent an energy efficiency kit? By utility

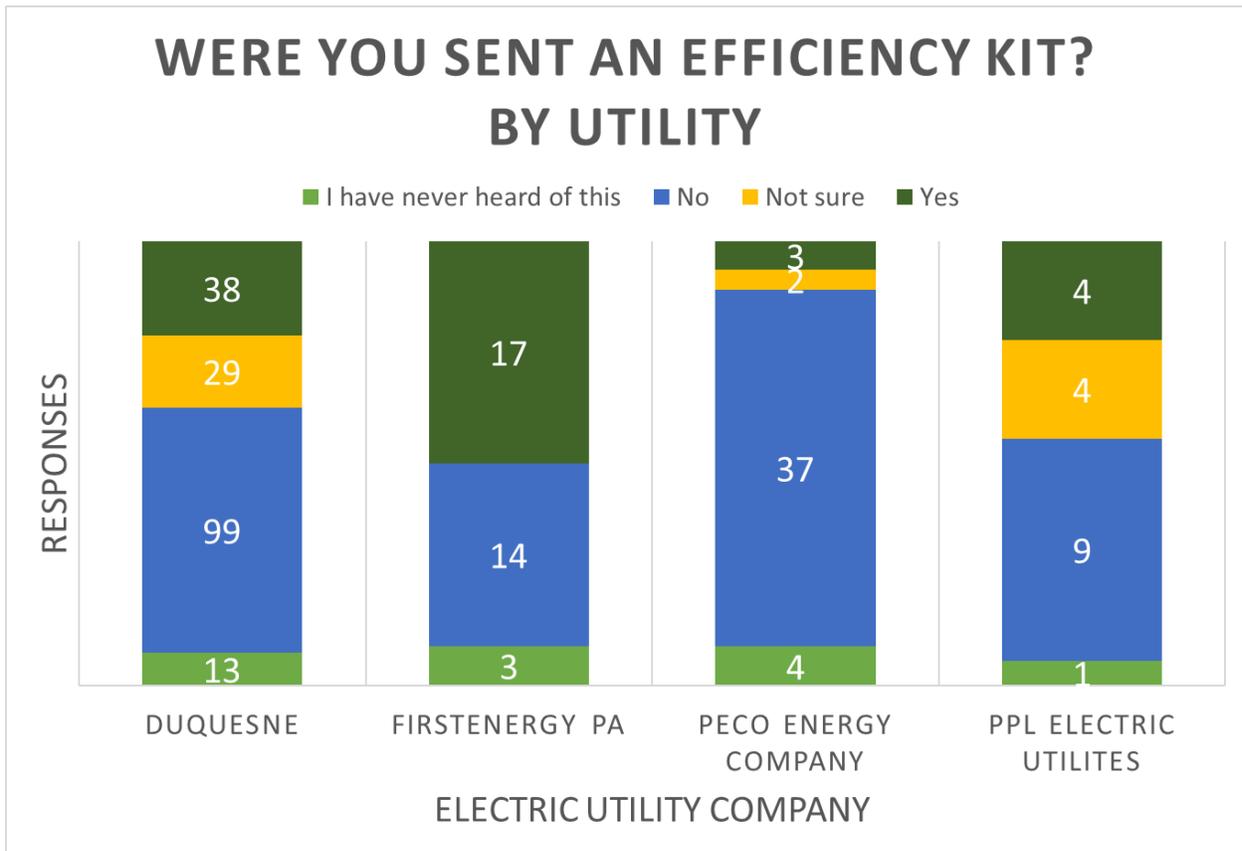


Table 2. By utility: If you answered “interested” or “have plans to” get a heat pump, what barriers are you facing?

Duquesne	86
Cost concern	21
Energy cost concerns	1
Finding professionals to install them that are competent and willing	1
Lots of other expensive home repairs to make first.	1
More info needed	30
No immediate plans	2
Renter	1
The incentives to install heat pumps are confusing to navigate	15

The incentives to install heat pumps are not enough	13
Would have to fit a mobile home	1
FirstEnergy PA	23
Cost concern	5
More info needed	8
Renter	1
The incentives to install heat pumps are confusing to navigate	5
The incentives to install heat pumps are not enough	4
PECO Energy Company	17
Cost concern	2
More info needed	4
No immediate plans	1
PA equipment rebates are uncertain, don't know where to apply for them.	1
Renter	3
The incentives to install heat pumps are confusing to navigate	4
The incentives to install heat pumps are not enough	2
PPL Electric Utilities	9
Cost concern	2
More info needed	3
The incentives to install heat pumps are confusing to navigate	3
The incentives to install heat pumps are not enough	1
Grand Total	135