

# *Weatherization Works!*

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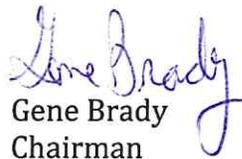
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

RE: Docket No.: L-2016-2557886

Dear Secretary Chiavetta:

Please consider the attached comments on the Proposed Rulemaking regarding a possible revision of the existing LIURP (Low Income Usage Reduction Program)

Sincerely,

  
Gene Brady  
Chairman

## **Comments of the PA Weatherization Providers Task Force**

The PA Weatherization Providers Task Force is a network of 37 organizations providing energy conservation services in each of the Commonwealth's 67 counties. The Task Force entities provide a dual role of not only administering the Low Income Usage Reduction Program (LIURP) but also the Department of Community and Economic Development Weatherization Assistance Program. Task Force providers are Community Based Organizations (CBO's) that have the experience and community presence to meet the home energy conservation needs of the low income households of our communities.

The following responses are on behalf of the PA Weatherization Providers Task Force. Thank you for the opportunity to make these comments part of the record.

### **1. Are the existing regulations meeting the charge in 52 Pa. Code § 58.1? If not, what changes should be made?**

#### **Recommendation:**

It is our recommendation that the income threshold be increased to 200% of the Federal Poverty Income Guideline to be consistent with the DCED WAP income limit.

### **2. How should LIURPs be structured to maximize coordination with other weatherization programs such as DCED's WAP and Act 129 programs?**

#### **Recommendation:**

It is our recommendation that utility companies continue to utilize Community Based Organizations (CBO's) to both administer and deliver LIURP services. Many CBO's also provide DCED's WAP program thus having the same entity administer both programs makes sense not only for the utility company but also the customers they serve. Many low income households in our local communities are familiar with the services and programs offered by their Community Based Organizations. Because of this, a CBO can coordinate the services of the LIURP program and DCED's WAP program.

The use of a CBO also makes these programs work more efficiently. If a customer is eligible for both programs, the CBO can ensure there is no duplication of services.

**3. How can utilities ensure that they are reaching all demographics of the eligible populations in their service territories?**

**Recommendation:**

Utility companies should continue to solicit customers through bill inserts. Utility companies have also now moved toward online billing and solicitation. Utility companies have the ability to distribute email “blasts” to publicize LIURP. These blasts should be targeted toward those customers who may have received LIHEAP in the past or are currently enrolled in the companies CAP programs but have not received LIURP services in the past.

**4. What design would better assist/encourage all low income customers<sup>11</sup> to conserve energy to reduce their residential energy bills and decrease the incidence and risk of payment delinquencies?**

**How does energy education play a role in behavior change?**

**Recommendation:**

Because LIURP does not always result in energy reduction, introducing or increasing energy education is the best avenue to utilize. Participation in energy education should be mandatory before, during and after the LIURP process. The most efficient way for people to understand the importance of on time payments and reduce their energy costs is to provide them with the tools to do so.

**6. How can LIURPs best provide for increased health, safety, and comfort levels for participants?**

**Recommendation:**

LIURP services should continue to include the installation of smoke and carbon monoxide alarms.

**7. How can LIURPs maximize participation and avoid disqualifications of households due to factors such housing stock conditions?**

**Recommendation:**

Community Based Organizations are aware of services above and beyond LIURP and WAP. The connection CBO's have to other entities allow us to make the appropriate referrals to agencies that may be able to assist a customer with issues that prevent them from being eligible for LIURP activities.

**8. What is the appropriate percentage of federal poverty income level to determine eligibility for LIURP?**

**Recommendation:**

To be consistent with DCED's WAP income guideline, we suggest 200% of the Federal Poverty Income Guideline be used.

**9. With the additional energy burdens associated with warm weather, what if any changes are necessary to place a greater emphasis on cooling needs?**

**Recommendation:**

Pennsylvania is known for having all 4 seasons so as much as we encourage energy savings when heating homes in the winter months, energy savings should be encouraged during the summer months to cool homes as well. Implementing installation or upgrading of a home's cooling system (ie inoperable or inefficient air conditioners) along with providing energy education will lessen the energy burden during the summer months.

**10. What are options to better serve renters, encourage landlord participation, and reach residents of multifamily housing?**

**Recommendation:**

The same avenues expressed before: Utility companies should continue to solicit customers through bill inserts. Utility companies have also now moved toward online billing and solicitation. Utility companies have the ability to distribute email "blasts" to publicize LIURP. These blasts should be targeted toward those customers who may have received LIHEAP in the past or are currently enrolled in the companies CAP programs but have not received LIURP services in the past. In particular when it comes to landlords they should be provided with information on how LIURP services may actually increase the value of their home.

**12. Should the interplay between CAPs and LIURPs be addressed within the context of LIURP regulations? If so, how?**

**Recommendation:**

The connection between Customer Assistance Programs (CAPs) and LIURP should be interdependent on each other. Historically CAP was the best fit for a high usage, payment troubled customer. The first line of defense for high usage is LIURP. Both CAP and LIURP have the same general goal, help the customer better manage their utility related expenses. The intertwining of these programs however would call for an increase in the income guideline for CAP.