



DELAWARE VALLEY GREEN BUILDING COUNCIL

Pennsylvania Public Utility Commission
Attention: Secretary
P.O. Box 3265
Harrisburg, PA 17105-3265

April 13, 2012

RE: DVGBC Comments on Act 129 Energy Efficiency and Conservation Program Phase Two
Docket No. M-2012-02289411

To the Secretary,

On behalf of the Delaware Valley Green Building Council (DVGBC), I am writing to offer the following comments for consideration by the Public Utility Commission (the "Commission") in the above-named docket.

The DVGBC represents 900 members of the green building industry in Eastern Pennsylvania and Delaware, including architects, engineers, builders, construction managers, developers, building product manufacturers of all kinds, as well as members of the legal, financial and service industry. We are a non-profit organization working to promote green building practices to support a more productive economy and healthier living and working environments in our region.

We strongly support Act 129 and its renewal and ask that you consider the following points for Phase Two of the program. Many of these are also advanced by the Keystone Energy Efficiency Alliance (KEEA) platform:

1. Length of second EE&C Program and Energy Savings Goals

DVGBC encourages the Commission to extend Act 129 for five years and establish an additional energy savings goal totaling 6.25% by December 31, 2018 that builds on the current goal of 3% savings by May 31, 2013. By extending the program an additional half year, program years will match calendar years and alleviate confusion, and unnecessarily complex reporting and data tracking issues that result when calendar years and program years are out of sync. The 6.25% represents a 1.25 goal for each year. These targets should allow some flexibility to move from one program goal year to the next without market disruptions.

We believe the utilities' need the ability to establish flexible, creative, and innovative energy and demand savings programs that target comprehensive and deep energy savings. We strongly encourage the Commission to require utilities to demonstrate and report on their consistent progress towards achieving the overall 6.25% reduction goal set forth in the extension of Act 129 as well as report on yearly goals. We encourage the Commission to provide positive incentives to utilities to drive consistent annual progress. Further, we encourage the Commission to require more detailed reporting



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after two years, four years, and again at the end of the five and a half year period that compliments interim reporting requirements.

2. Municipal, Schools, Hospitals and Nonprofits

The requirement for at least 10% of verified savings from the municipals, schools, hospitals and non-profits sector should remain, and the utilities should be encouraged to develop innovative programs to assist schools and multifamily housing units serving low-income households, particularly those facing budgetary cutbacks to save energy and reduce their energy costs as quickly and significantly as possible. On bill finance, with detailed protections for residential consumers, may be an appropriate financing tool for this sector. Further, we suggest that the Commission use the stakeholders process to report on this sector results and participants.

3. Financing

The availability of convenient and cost effective financing will be an increasingly important component of successful implementation. The state has already made a significant investment in the Keystone Help Loan Program which has clearly demonstrated its value in encouraging investments in energy efficiency. We recommend the Commission work with the utilities and the State Treasurer to find the best solutions to fund and leverage this national award-winning program resource. On Bill financing for residential and nonresidential customers can assist in providing access to customers who are not well served by current program approaches, including small commercial customers, multifamily buildings housing low-income residents, schools and municipalities. The Public Utility Commission should develop guidelines that protect low income and other consumers as part of any residential on bill financing options. Utilities could be incentivized to design pilot on bill finance programs for both residential and non-residential consumers.

4. Benchmarking

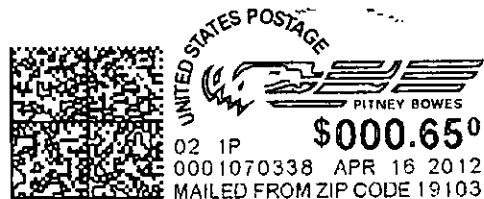
To facilitate benchmarking of commercial buildings, the utilities should automate the transfer of whole building customer usage data to benchmarking tools such as Portfolio Manager, the EPA's free software, or other approved software. This has the potential to assist the utilities in meeting their goals for Act 129 by identifying opportunities for energy efficiency improvements, and support the growing number of commercial building owners, tenants, and municipalities statewide interested in benchmarking as a tool to encourage energy efficiency in buildings.

Thank you for your consideration of these issues. Please contact me if you have any questions about these or other related ideas.

Sincerely,

Janet Milkman
Executive Director





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