

ACTION -Housing inc.
Allegheny Council To Improve Our Neighborhoods

425 SIXTH AVENUE • SUITE 950 • PITTSBURGH, PENNSYLVANIA • 15219-1819

TELEPHONE 412/281-2102 • FAX 412/391-4512 • E-MAIL ADDRESS ahi@actionhousing.org

December 20, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Docket No. M-2012-2334399
Duquesne Light Energy Efficiency and Conservation Plan – Act 129, Phase II

Dear Secretary Chiavetta:

Enclosed for filing are comments from ACTION-Housing, Inc. for the docket number referenced above.

Sincerely,



Lawrence Swanson
Executive Director
ACTION-Housing, Inc.
P: 412-281-2102
E: lswanson@actionhousing.org



Christov Churchward
Energy Conservation Enterprise Program Administrator
ACTION-Housing, Inc.
P: 412-281-2102 x2057
E: cchurchward@actionhousing.org

Comments of ACTION-Housing, Inc.

Introduction

ACTION-Housing, Inc. respectfully submits the following comments regarding Duquesne Light's EE&C Phase II plan, Docket Number M-2012-2334399 to the Pennsylvania Public Utility Commission ("Commission"). In addition to owning and managing 35 properties in Western Pennsylvania, ACTION-Housing has developed a one-stop shop that facilitates energy retrofits for multifamily affordable housing. Our program provides property audits, a report detailing recommended interventions, assistance securing financing, contractor selection and construction management, tenant and property staff education, and energy savings tracking and analysis. We commend the Commission for encouraging the utility companies to specifically target multifamily housing and for Duquesne Light to follow through on that recommendation. Our comments herein specifically pertain to Duquesne Light's proposed Multifamily Housing Retrofit Program.

3.5.2 Multifamily Housing Retrofit Program

We commend Duquesne Light for developing a program specifically dedicated to multifamily housing and for engage a CSP to oversee its implementation. We especially commend Duquesne Light's proposal to offer a full service program for multifamily buildings, including: audit, technical assistance, contractor negotiation, construction oversight, bulk purchasing, and financing assistance. It is our experience that a one-stop-shop service is essential for moving potential projects beyond the audit stage all the way through to a completed retrofit.

Considering the complications associated with financing buildings with tenant paid utilities, we understand Duquesne Light's proposed focus on master metered accounts. However, we caution Duquesne Light to not only and selectively target master metered buildings as a matter of equality.

Although residents indirectly benefit when master metered buildings are retrofitted through a decreased necessity for the property owner to raise rents due to high utility bills, it is only in tenant paid buildings that the residents directly benefit from retrofits. This is particularly important to be mindful of in affordable housing.

We are supportive of Duquesne Light's proposal to target building stock comprised of dwelling units for income qualified occupants. We urge Duquesne Light and the Commission to measure income qualification not on a unit-by-unit basis, but as an entire building average. This will ensure income qualifying residents are still prioritized while also addressing the entire building as opposed to individual rooms. Addressing the entire building is essential for ensuring maximum energy savings.

We are supportive of Duquesne Light's focus on financing the retrofits. Duquesne Light specifically calls upon the eventual CSP to "integrate funding sources to include program and agency co-funding, performance contracting, grant funding, and available financing options." It is our experience that providing multiple financing options is essential to successful retrofit implementation. To this end, we urge Duquesne Light to consider introducing a pilot on-bill financing option. This proposed pilot program will help inform the PUC's current discussions about including an on-bill financing component in the future. Engaging in a pilot program will give Duquesne Light valuable practical experience, allowing them to better assist in the development of a successful on-bill financing option that works for both property owner and Utility.

Respectfully,



Christov Churchward
Energy Conservation Enterprise Program Administrator
ACTION-Housing, Inc.
P: 412-281-2102 x2057
E: cchurchward@actionhousing.org