



Weatherization Works!

October 13, 2017

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

RE: Reply Comments of the Pennsylvania Weatherization Providers Task Force
Docket No.: M-2017-2596907

Dear Secretary Chiavetta:

The following reply comments are being submitted on behalf of the PA Weatherization Providers Task Force relative to the Pennsylvania Public Utility Commission's Comprehensive Review of Universal Service Programs and Energy Conservation Programs. The prior comments submitted by the PA Weatherization Providers Task Force both in the LIURP review proceedings and this broader review are not repeated herein but are incorporated by reference.

The PA Weatherization Providers Task Force is a network of 38 organizations providing energy conservation services in each of the Commonwealth's 67 counties. Task Force providers provide a dual role of not only administering Energy Conservation programs but also the Department of Community and Economic Development Weatherization Assistance Program. Task Force providers are Community Based Organizations (CBOs) that have the experience and community presence to best meet the home energy needs of the low-income households of our communities.

Community Based Organizations

At the BCS stakeholder meeting held on September 14th the issue was identified and discussed as to whether to use experienced CBOs or private contractors in the administration of Universal Service Programs. It is our recommendation that utility companies continue the use of Community based Organizations (CBOs) such as those of the Weatherization Providers Task Force, to administer LIURP, Customer Assistance Programs and Hardship programs.

Community based Organizations (CBOs) have a number of attributes that put them in a unique situation to offer assistance and/or guidance to the most vulnerable members of their local communities. Many organizations function as multi-service agencies offering not only energy

assistance and universal service programs but also emergency services, housing services and food and nutrition services. These organizations also offer flexibility and familiarity, which allows for quick and efficient response times in meeting the needs of those seeking services. Further, their experience in working in their respective communities is invaluable. They are familiar with the low-income population in their respective communities and their low-income clients know and trust these organizations.

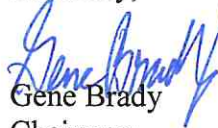
Eligibility

While CBOs focus on coordinating services across programs to best serve its clients, inconsistency with program guidelines often times prevents a CBO from matching a client with the most comprehensive solution to their problem. The existing LIURP regulations in 52 Pa. Code §58.2 defines a low income customer as “a residential utility customer with a household income at or below 150% of the Federal poverty guidelines.” The PA Weatherization Task force recommends increasing the income guideline to 200% of the FGIP as this would not only be consistent with the Department of Community and Economic Development Weatherization Assistance Program but it would also increase the pool of potential applicants.

Programs such as the Low Income Usage Reduction Program (LIURP), Customer Assistance Programs (CAP) and Hardship Programs provide integral support to the low-income families, senior citizens and the vulnerable of our communities. These programs not only provide monetary assistance both short and long term but they allow many to remain in their homes by improving health and safety and maintaining utility service.

The PA Weatherization Providers Task Force appreciates the opportunity to comment on these vital programs and will remain committed to working to improve these programs as this process moves forward.

Sincerely,


Gene Brady
Chairman