

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Act 129 Energy Efficiency and
Conservation Program Phase IV**

Docket No. M-2020-3015228

**REPLY COMMENTS OF THE COMMISSION ON ECONOMIC OPPORTUNITY TO
THE PHASE IV TENTATIVE IMPLEMENTATION ORDER**

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I. INTRODUCTION

The Commission on Economic Opportunity is a community action agency located in and serving low income households in Luzerne County. CEO submitted Comments to the Phase IV Tentative Implementation Order by electronic filing on April 27, 2020. CEO's comments addressed certain issues involving Act 129 Phase IV low-income issues. In its comments CEO recommend the following:

1. Increase the low-income carve out to require that savings greater than 5.8% of the overall savings be obtained from low-income customers.
2. Require that a certain percentage of low-income savings come from direct install measures.
3. Require that the EDCs contract with the CBOs that operate LIURP for the delivery of Act 129 measures to low-income customers.

In these Reply Comments CEO will reply to certain low-income issues raised in other submitted comments.

II. REPLY COMMENTS

The Low-Income Carve-Out Should Be Increased to 6.5% of the Overall Savings

In its Comments, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) submits that the low-income carve-out should be increased to 6.5%. CEO supports that requested increase to 6.5%. As CAUSE-PA indicates in its Comments the SWE determined that low-income customers could achieve approximately 6.5% of the statewide portfolio savings when historical levels of energy efficiency and demand response budgets are applied to low-income programs. Additionally, because of the potential carry forward of Phase III low-income savings to Phase IV the possibility exists a substantial portion of Phase IV low-income savings could be achieved simply from the carry forwarding of Phase III savings. It is for the above reasons, and the reasons previously cited in CEO's Comments the low-income carve out should be increased to 6.5%.

Competitive Bidding and the Use of LIURP Agencies

Some parties have recommended that the traditional competitive bidding requirements be relaxed under certain circumstances. (See Comments of Energy Association of PA and PPL). In its Comments, CEO has submitted that the EDCs be required to contract with the CBOs that operate LIURP for the delivery of Act 129 measures to low-income customers. CEO supports the relaxation of competitive bidding requirements that would allow for CBOs that traditionally operate an EDC's LIURP program to provide Act 129 measures to those same low-income customers. The Commission sought ways to coordinate the delivery of LIURP and Act 129 measures; bidding procedures that would allow for that coordination to take place are needed to accomplish that goal.

Respectfully Submitted,



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