

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission

Dear Secretary Chiavetta,

We are writing to offer comments and recommendations in reference to Docket# M-2020-3020824 which was filed by PPL Utilities Corporation to change its service delivery model for implementation of phase IV of its LIURP "WRAP" program. These comments and recommendations are made on behalf of the Pennsylvania Coalition of Local Energy Efficiency Contractors (PA-CLEEC)

For several decades, with oversight by the PUC, Public Utilities in the Commonwealth of Pennsylvania have delivered energy conservation programs. This correspondence specifically relates to energy conservation to our LIURP eligible neighbors of more modest economic means. In delivering these services the original intent was for the work in the field to be performed by community based contractors. As recently as October 9th 2020 David Hixson of the PUC Office of Communications reconfirmed that the PUC will continue "encouraging the use of qualified community-based organizations to provide these services".

Over the last several decades in all four corners of the state and all points in between an infrastructure has been developed to deliver energy conservation services to low income ratepayers. Community based organizations have hired staff who have become Building Performance Institute (BPI) and State Weatherization Program educated and certified. Community based organizations have purchased vehicles, tools and equipment specifically to service the energy conservation programs. Many of our employees have invested years and in many cases decades of their professional lives to delivering these services in meeting the goals and objectives of the PUC. Throughout this time the Public Utilities have engaged with us as true partners in the delivery of energy conservation services. They have treated us professionally and courteously and compensated us fairly. For this we have been, are and will be grateful.

In recent times there has been a movement by Senior Management at many Utilities to divest the responsibility for direct administration and management of these programs to CSPs. As you know CSPs are large organizations which operate across multiple states and in some cases nationally. To an extent we understand the Senior Management of Utilities desire to divest responsibility and have their management staff focus on their organization's core business activities.

With all of the aforementioned considered we desire to insure two basic goals are accomplished.

- 1) That the low income ratepayers continue to receive high quality, meaningful energy conservation services, with measurable usage reductions.
- 2) That the field services are delivered by the infrastructure of qualified community based contractors which is already in place and developed at the request and direction of the PUC and Utilities.

We simply believe that when these services are delivered by staff and management that is invested in and part of the communities being served the work will be done well.

In the initial interactions with CSPs our members have directly experienced many situations which have informed a conclusion that, absent of several conditions and assurances, the services our neighbors receive will not serve them well or meet the PUC's goals. In a following correspondence we will detail several specific past examples of our concerns. Additionally we will provide a separate correspondence which will detail several specific conditions to be included in requirements for CSPs in the administration of these programs which will insure continuation of delivery of high quality services.

It simply follows that field staff ultimately answering to management which is not even in the same time zone will not provide the same care and concern as field staff who answer to managers who are part of the community.

Thank you for your attention and consideration.

Sincerely,
PA-CLEEC Board Members

Mandy Fox-SED-COG
Danny Rodicok-Green Kite
Mike Omasta-Bill Busters
Pam Denlinger-Solaire Energy
Ken Provlic-Action Housing
Otis McNeil-Custom Weatherization
Rick Rovegno-Rovegno's of Carlisle
Michael Austin-Community Action Committee of the Lehigh Valley