

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission

Dear Secretary Chiavetta,

I am writing to offer comments and recommendations in reference to Docket# M-2020-3020820, which was filed by the Metropolitan Edison Company to change its service delivery model for implementation of their Act 129 Phase IV Energy Efficiency and Conservation Plan. These comments and recommendations are made on behalf of the Community Action Committee of the Lehigh Valley (CACLV).

For several decades, with oversight by the PUC, Public Utilities in the Commonwealth of Pennsylvania have delivered energy conservation programs. I am writing specifically about energy conservation for our LIURP eligible neighbors who due to financial hardship would qualify for “low-income” programs. 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, the Community Action Committee of the Lehigh Valley’s Weatherization Department has been building working relationships with trained and certified local contractors in order to deliver high-quality energy conservation services to low income ratepayers. CACLV and its subcontractors hired staff who have become Building Performance Institute (BPI) and State Weatherization Program educated and certified. CACLV and its subcontractors have purchased vehicles, tools and equipment specifically to service the energy conservation programs. Many of our employees and subcontractors 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. It has been our experience that CSPs do not provide the same level of service or even the same services as community based organizations most likely due to a reduced profit that can be made from specific energy saving measures. As a non-profit organization, CACLV is only interested in making sure the participants receive all the benefits they are eligible for regardless of profit margins. With this said we do 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 regardless of who provides the services
- 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 local contractors that are invested in and part of the communities being served the work will be done well and with measurable savings.

In the initial interactions with CSPs, ACLV and our subcontractors 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 or match the services provided by our organization and subcontractors. 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.

For 25 years ACLV has provided low income residents of the Lehigh Valley high quality weatherization services. Our organization is able to maximize services for our participants simply because we have multiple funding sources for weatherization allowing us to enroll the participant in multiple programs. We look forward to providing these services to our neighbors, improving their quality of life and improving the housing stock in our towns and cities.

Thank you for your attention and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Austin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Austin
Weatherization Director
Community action Committee of the Lehigh Valley