

# **Small Steps in Coordination Equal Leaps and Bounds for Pennsylvania’s Underserved Families: Driving Policy Improvements through Collaborative Advocacy**

*Jim Grevatt, Energy Futures Group*  
*Elizabeth Marx, Pennsylvania Utility Law Project*  
*Sarah Ralich, Action Housing*  
*Levana Layendecker, Housing Alliance of Pennsylvania*

## **ABSTRACT**

Low-income energy efficiency (EE) is an intersectional issue, and draws a diverse set of stakeholders from a spectrum of public interest fields. Since 2014, advocates from the environmental, affordable housing, energy, and low-income communities (including the authors of this paper) have worked together to develop a targeted strategy to drive improvements to low-income energy efficiency policy in Pennsylvania. Their work draws on the skills, expertise, and resources of multiple disciplines, and prioritizes the multiple benefits that energy efficiency provides for low-income households.

The advocates’ efforts have driven measurable success, including an increase in the savings carve-out for low-income EE programs, and targeted utility programs that provide EE for both master and individually metered multifamily buildings. These policy changes increased the utility-proposed low-income EE spending by more than \$30 million dollars over 5 years, of which \$28 million was committed specifically to multifamily housing. The advocates have since worked extensively with the Pennsylvania Housing Finance Agency and other key low-income housing stakeholders to connect housing providers with multifamily EE programming and to facilitate an open dialogue to adjust program terms and align program incentives.

Building on these successes, the advocates are now promoting an integrated approach to service delivery that addresses both bill affordability and EE opportunities. While proceedings are ongoing, it is hoped that continued efforts will provide further improvements for Pennsylvania’s underserved communities.

## **Pennsylvania’s Energy Efficiency Landscape**

### **Energy Poverty in Pennsylvania**

Even with assistance from bill reduction programs, such as the Low-Income Home Energy Assistance Program (LIHEAP) and utility-run Customer Assistance Programs (CAP), Pennsylvania’s low-income families face significantly higher energy burdens than do higher income households.<sup>1</sup> In 2016, over 300,000 of Pennsylvania’s poorest households—those with incomes at or below 50% of the federal poverty level (FPL)—paid an average of 28% of their income on home energy bills (Fisher, Sheehan, and Colton 2017). An additional 350,000

---

<sup>1</sup> An “energy burden” is defined as the percentage of household income used to pay for energy costs, including electricity, natural gas, and/or deliverable fuels (coal, oil, propane, and wood).

Pennsylvania households between 50-100% FPL paid an average of 15% of their income on home energy bills (Fisher, Sheehan, and Colton 2017). To be affordable, *combined* rent and utilities should not exceed 30% of a household's income (HUD n.d.). Low-income households facing high energy burdens often go without food, medicine, and other basic necessities to afford heat and electricity, while others forego adequate heat and electricity in order to afford basic necessities (NEADA 2011). This sort of deprivation has a direct and often long-term impact on the physical and mental health of low-income families, particularly children, and works to continue the cycle of poverty (Hernandez 2016; Drehobl and Ross 2016).

The need for affordable housing is a significant and growing concern in Pennsylvania. Not surprisingly, the families and individuals most in need of affordable housing are also most affected by high energy costs. Older affordable multifamily (AMF) buildings, which house a large number of low-income households across the state, often have deferred maintenance, are energy inefficient, and lack the necessary funds for improvement. There are over 370,000 AMF units in Pennsylvania, which collectively could reduce annual electricity usage by 25%, reduce gas usage by 13%, and realize \$3.30 in benefits for every \$1.00 invested in multifamily energy efficiency upgrades over a 20-year period (EEFA 2015).

## Legal and Political Landscape for Energy Efficiency Programming

The Act 129 Energy Efficiency and Conservation (EE&C) Program, the Weatherization Assistance Program (WAP), and the Low-Income Usage Reduction Program (LIURP) all provide low-income EE programming in Pennsylvania. Each is subject to a unique set of governing laws, regulations, and policies.

**Act 129.** Act 129 was passed in 2008, and imposed a number of electric utility reforms, including comprehensive energy efficiency requirements. Initially, Act 129 required each large electric distribution company (EDC)<sup>2</sup> to reduce consumption by at least 1% by May 31, 2010, and 3% by May 31, 2013. Thereafter, the Act empowered the Pennsylvania Public Utilities Commission (PUC) to assess the ongoing potential for cost-effective energy efficiency programming, and set additional periodic reduction targets as appropriate.<sup>3</sup> Each EDC was required to develop an EE&C Plan, subject to PUC approval and oversight, to meet the established standards (Act 129 2008).<sup>4</sup> The Act is being implemented in multi-year Phases, with implementation currently in Phase III.

**Phase I.** The PUC issued its Phase I Implementation Order on January 16, 2009 (Pa Public Utility Commission 2009). The Order required utilities' EE&C Plans to include "proportionate" measures for *residential* low-income consumers, but did not impose a specific savings target. The Order also required the utilities to achieve a minimum of 10% of its

---

<sup>2</sup> The EDCs subject to Act 129 include PECO, PPL Electric; Duquesne Light Co.; and the four First Energy Companies (Metropolitan Edison, Penn Power, Penelec, and West Penn Power).

<sup>3</sup> Act 129 capped spending at 2% of a utility's respective 2006 jurisdictional revenue.

<sup>4</sup> Among the most critical requirements in the Act was a mandate that a "proportionate" number of measures be available for low-income households at or below 150% of the federal poverty level, as well as the obligation to "coordinate measures" with other utility, state, and federal-level EE programs.

Commercial and Industrial (C&I) savings from government and nonprofit customers (Act 129 2008; Pa Public Utility Commission 2009).

Because Phase I low-income programming was funded through residential class charges, low-income program dollars could only serve residential customers. This meant that only *tenant-paid, individually-metered* multifamily units could be served through Phase I low-income programs. But because the margin of savings is often very small for individual units, AMF tenants are not likely to participate on their own. And, because property owners either do not see bill savings for their tenants as worth the trouble or lack the resources, they are often not willing to coordinate building-wide program participation. Master-metered multifamily buildings could theoretically access C&I programs to treat common areas and master-metered units, but the cost-sharing thresholds in Phase I were onerous enough to rule out participation by most AMF owners, many of whom lack capital to invest in energy efficiency upgrades.

**Phase II.** The PUC's Phase II Implementation Order established a specific low-income savings target of 4.5% of total portfolio savings, but did not change its residential-only limitations. It also expressly encouraged EDCs "to give special emphasis and consideration to multifamily housing within the government/educational/nonprofit sector and to reach out to the Pennsylvania Housing Finance Agency (PHFA) for assistance and coordination of efforts." The PUC recognized that AMF properties have been "underserved due to barriers and issues with metering classification", and that it "has the potential to provide significant energy savings and to address aging multifamily housing stock within the state" (Pa Public Utility Commission 2012). Despite the PUC's stated encouragement for AMF programming, the utilities' Phase II Plans by and large failed to adopt programming capable of overcoming the split-incentive issues inherent in serving this unique building type.

**Phase III.** Covering the period from 2017 through 2022, Phase III both increased the low-income savings target to 5.5% of total portfolio savings and made important clarifications to what types of programs would qualify to be counted towards this requirement. The EDCs agreed to several requirements designed to improve MF program services, but the Commission declined to establish specific MF savings requirements, citing the lack of data needed to determine what such a target should be.

**Weatherization Assistance Program (WAP).** The Weatherization Assistance Program (WAP) is a federal program to assist low-income households to decrease household energy costs, administered in Pennsylvania by the Department of Community and Economic Development (DCED). In 2009, Pennsylvania received an influx of \$252.8 million over five years to support and expand WAP. PHFA was awarded \$22.5 million from DCED to administer its Preservation Through Smart Rehab program (CBEI 2014). Over five years, this program upgraded 8,288 units and 109 properties. WAP funding from the American Recovery and Reinvestment Act of 2009 (ARRA) concluded in 2012, creating a dearth of low-income energy efficiency programming in the state, particularly for AMF buildings (Pa DCED 2009). Pennsylvania's normal WAP budget is approximately \$14 million.

**Low-income Usage Reduction Program (LIURP).** Every large regulated electric and natural gas company in Pennsylvania is required to operate a Low-Income Usage Reduction Program

(LIURP), which provides comprehensive energy efficiency and weatherization services to low-income residential consumers with higher than average usage (Pennsylvania Code 1993). The program is open to owners and tenants; however, homes must meet a usage threshold in order to qualify. AMF tenants are most often excluded from participating in LIURP because of the usage threshold, even when they have higher usage compared to similarly-sized single-family homes.

## **PA EEFA**

The PUC was in the early stages of planning for Phase III of Act 129 in 2014 when the Pennsylvania Energy Efficiency for All (PA EEFA) coalition was created to improve, and increase the availability of low-income energy efficiency in Pennsylvania. PA EEFA was formed based on the fundamental assumption that more can be achieved by working together than by working separately. However, this coalition is unusual because, from the beginning, it included low-income energy advocates, environmental advocates, and housing providers who came together to find where their missions intersect.

The goal of the coalition is to address energy efficiency for AMF housing. Currently PA EEFA consists of the following organizations:

- **Energy Efficiency:** Keystone Energy Efficiency Association (KEEA)
- **Low-income Consumer Advocates:** Pennsylvania Utility Law Project (PULP)
- **Affordable Housing:** Housing Alliance of Pennsylvania, ACTION Housing, Regional Housing Legal Services (RHLS)
- **National Organizations:** Natural Resources Defense Council (NRDC), National Housing Trust (NHT)

Many opportunities arise from the effective issues communication in the group, without which the opportunities for policy growth would not be as obvious. The expertise shared amongst the members helps to better inform the efforts of each in their respective sphere. In Pennsylvania there have been regulatory and other proceedings in which PA EEFA has had opportunities to provide recommendations and to influence improved outcomes. The fact that the utility commission in particular has provided such opportunities is critical to PA EEFA's ability to encourage positive change.

### **Diverse expertise allows PA EEFA to play in a variety of venues**

Having diverse partners at the table helps the coalition to be most effective. NRDC and NHT bring familiarity both with how the issues around AMF EE are addressed in other states, and with the federal legislative landscape. PULP is plugged into the regulatory framework for utilities related to low-income energy issues, including EE. KEEA and NRDC know what's going on at the Statehouse and bring potential threats and opportunities to the PA EEFA table for discussion. Action Housing and the Housing Alliance are up to speed on issues that are specific to AMF, and in particular provide valuable insight into how well EE services are working from the property owners' perspectives.

The group continues to evolve and grow as new obstacles to increasing energy efficiency come into view. As actions were implemented to work with utilities on increasing their outreach

to multifamily properties, it became clear that additional partners were needed to facilitate those relationships. For example, after the first year, the Housing Alliance of Pennsylvania was added to bring more multifamily housing providers and building managers to the table. Since then, communication with multifamily providers has increased. The coalition continues to make progress as a result of this unique collaboration and plans to continue to solicit new partners that can help to move the work forward.

### **Focus on shared objectives rather than on resolving divergent perspectives**

PA EEFA gains strength by coalescing around the policy areas where there is agreement, while accepting that there will be differences of opinion in other areas that will be best addressed by coalition members individually. To this end, PA EEFA created “Principles of Partnership” that have guided the coalition’s work, including helping to steer through challenging areas of disagreement. Members continue to work on other issues that are important to them even when where there is not agreement on a preferred policy approach within PA EEFA. Deciding to put aside the few areas of difference to focus on the many areas of agreement allows PA EEFA to strengthen policies that support the health, safety, and welfare of low-income Pennsylvanians.

On-bill financing is one area in which members of PA EEFA have differing points of view. On-bill financing is often touted as one of the only tools that can overcome the challenges associated with complex MF investment structures that preclude owners from taking on additional debt for financing EE improvements. However, low-income advocates see the potential negative impact such a program could have on low-income utility customers in Pennsylvania by creating high-risk debt, which could lead to loss of utility service for failure to pay the portion of the utility bill that is related to financing the efficiency improvements, rent increases that might result from an owner’s desire to offset higher bills due to financing efficiency improvements, and potentially even eviction for non-payment if promised savings do not materialize. As a result, the coalition decided to table the discussion of on-bill financing rather than advocate for it collectively.

### **Geographic reach of members allows statewide approach**

Pennsylvania is a large state, and advocates in Pittsburgh won’t always know what is happening on the AMF front in Philadelphia or Harrisburg. Because PA EEFA members come from all corners of the state, the coalition is much more able to address AMF issues on a statewide, rather than only a local basis. The level of information exchange in PA EEFA improves both the quality and consistency of AMF solutions.

### **Stepping back to consider the big picture**

Individual PA EEFA members work in or are affected by policy and regulatory decisions in different arenas, and so members are able to share information that others might not be aware of. The coalition can then collectively step back to consider how improvements in policy in several related forums can work together to improve the overall picture for AMF EE. While the benefits of this approach will take time to realize, PA EEFA has made efforts to influence

improvements in coordination for Act 129, WAP, and LIURP that ultimately could streamline participation in multiple programs while increasing the overall level of service provided.

## **PA EEFA Process**

Because so much of PA EEFA's effectiveness is dependent on regularly sharing information about the constantly changing landscape, PA EEFA holds monthly calls for this specific purpose. When particular opportunities require action, those members of the group who are actively involved with particular activities communicate and coordinate more frequently as needed. PA EEFA also holds in-person meetings in Harrisburg once or twice annually for the purpose of identifying opportunities, prioritizing activities, and determining which members will lead or participate in which efforts.

## **What PA EEFA Has Accomplished**

### **Act 129 Multifamily Programming**

In late 2014, shortly after PA EEFA formed, the PUC initiated its Phase III Act 129 proceeding, which provided PA EEFA with a critical forum to push for policy changes and program enhancements to effectively serve AMF buildings. The PUC's acknowledgement in Phase II that AMF housing is underserved set the stage for PA EEFA to accomplish this advocacy. In the initial comment proceeding, the group drew from the varied expertise of NHT, NRDC, KEEA, PULP, and ACTION Housing in the design, implementation, and delivery of effective energy efficiency programming to propose best practice solutions. There were several wins for PA EEFA. First, the PUC's Phase III Implementation Order increased the low-income savings target from 4.5% to 5.5% of total portfolio savings. Importantly, the Order expressly allowed for the attribution of savings and costs from low-income multifamily programs to count toward the low-income savings requirement. The Order also established a MF work group which brought utilities, the PUC, and stakeholders to the table to discuss how the utility could structure its programming to appropriately serve AMF properties within the Phase III parameters. The Commission did not, however, establish a specific AMF requirement, in large part because the statewide potential study had not specifically assessed the potential for AMF savings (Pa Public Utility Commission 2015).

The PUC's detailed guidance in its Phase III Implementation Order and PA EEFA's active engagement in the MF work group led utilities to craft their proposed Phase III Plans to include AMF programming. This put PA EEFA in a strong advocacy position in the subsequent litigation of the Phase III Plans because it did not need to propose programming from scratch. PA EEFA, collectively, filed public comments that identified obstacles to effective AMF programming within each utility's plan. PULP then intervened and litigated on behalf of CAUSE-PA in the plan cases before the PUC, proposing meaningful solutions to address and resolve those obstacles to more adequately serve the AMF community. Many of these solutions were ultimately included in the negotiated settlement agreements.

As a result of PA EEFA's coordinated policy and litigation efforts, dedicated electric utility funding for AMF energy efficiency projects increased by more than \$28 million over a five-year period. As of July 2017, one year into the five-year Phase III program period, regulated

electric utilities completed energy upgrades in over 1,700 AMF housing units. An additional 3,800 units were pending completion, and over 5,000 units were identified to be served in the following year. These units would most likely not have been served if it were not for the unified and persistent advocacy efforts of the PA EEFA Coalition.

In addition to increased funding, the utilities agreed to a number of program improvements and collaborative efforts to help overcome barriers to serving AMF properties:

**Coordination with Pennsylvania Housing Finance Agency.** Each utility agreed to align its AMF program offerings with the LIHTC energy efficiency requirements promulgated by PHFA.

**AMF Stakeholder Meetings.** Each utility committed to partnering with the Housing Alliance of Pennsylvania (an EEFA member) to host stakeholder meetings designed to bring multifamily building owners, developers, and other key parties to the table to solicit feedback about the utility's program design and implementation and to drive interest and participation in the programs. In addition to driving interest in the programs, these meetings helped forge relationships with the electric utilities, which have come to look to PA EEFA partners as a trusted resource for identifying new projects, recommending appropriate reforms, and helping to resolve barriers which prevent AMF properties from receiving energy efficiency programming.

**Cross-Sector Coordination.** Each utility agreed to establish a single point of contact and/or enhance cross-sector program communication. This effort is critical, particularly for individually metered buildings which require a combination of Residential and Commercial programming if both individual units and common areas are to receive EE improvements at the same time.

### **Low-income Usage Reduction Program (LIURP)**

PA EEFA has also made noteworthy inroads in the advancement of AMF programming in LIURP. In Philadelphia Gas Works' (PGW) service territory, PA EEFA's partners were successful in pushing for the development of a small AMF program (Pa Utility Commission 2017). The program is unique in that it is available for any AMF property regardless of metering configuration, because, unlike other regulated utilities which recover LIURP funding from residential customers only, PGW recovers funding for its LIURP from all ratepayers.

### **Weatherization Assistance Program**

PA EEFA members have begun to lay the groundwork to develop AMF programming through the Weatherization Assistance Program (WAP). Since the end of ARRA, DCED has not focused Weatherization efforts on AMF, so it is notable that DCED included AMF as a key area for policy development in its 2018-2019 program year. In fact, for the first time since ARRA, DCED supported a 72-unit AMF development through WAP, with a 78% WAP contribution. The success of this project was due to collaboration between PULP and ACTION Housing. An additional 33-unit AMF job was recently completed with 100% WAP contribution. At least one more AMF WAP project is anticipated for the 2017-2018 program year. Experiences gained through these projects will help shape meaningful AMF WAP programming in the coming years.

## Ongoing Challenges

### Lack of Dedicated Natural Gas Energy Efficiency Programming

There are many limitations and restrictions to the Act 129 programs, the biggest one being that the programs are electric only, with the result that gas retrofit measures are not funded by utilities. This gap in funding makes whole building retrofits particularly difficult as gas is typically the primary source for heat, especially in Western Pennsylvania. While PA EEFA members have had limited success in the litigation of voluntary EE&C programs,<sup>5</sup> the lack of consistent natural gas energy efficiency programming for AMF across the state poses a significant challenge in Pennsylvania, where the use of natural gas is steadily proliferating (Pa Public Utility Commission v. UGI Utilities, Inc. 2016).

### Multifamily Metering Configurations

For electric service, multifamily buildings are usually either master-metered—meaning that the entire building is on one electric meter paid by the owner, or individually metered—meaning the tenants have their own electric meter that they are responsible for. Many individually-metered buildings also have common areas, including hallways, lobbies, parking garages or lots, and laundry rooms for which the landlord is responsible. Where natural gas service is used, it is more common that it is master-metered, though individual metering is also possible.

Master metered buildings are typically on commercial rates, which means that they are only eligible to participate in commercial EE programs. The dwelling units in individually metered buildings are usually on residential rates, with the result that the individual tenants, rather than the landlord, are the potential program customers for residential programs. To further complicate the picture, the common areas are usually on commercial rates, so that the landlord is eligible only for commercial programs for those areas.

Often the owner is unwilling to pay for building upgrades that reduce tenants' utility bills. In HUD funded buildings where there is a calculated utility allowance every year to determine the rate of rent the tenant pays, there is a disincentive to saving money on the tenants' utility bill because their rent will go up based on the expected energy savings. All of this can conspire to make program participation complicated—indeed, too complicated for many potential participants. PA EEFA gained ground with the EDCs through their commitment to promoting a “single point of contact” approach to AMF customers, but more work is needed to ensure that this approach is effectively deployed across the state.

### Different Definitions of Low-income

The definition of low-income is not consistent across the utility and housing sectors. AMF housing programs most often use area median income (AMI)<sup>6</sup> to determine qualifying

---

<sup>5</sup> UGI, a natural gas distribution company in North and Central Pennsylvania, has a voluntary EE&C Plan for two of its subsidiaries which each include a limited AMF program.

<sup>6</sup> Area median income (AMI) is the median dollar amount that divides the population into two equal parts. HUD uses AMI to determine eligibility for low-income programs based on metropolitan area and household size.

income of the tenants (PHFA 2018). However, Act 129, LIURP, and WAP use the federal poverty income guidelines (FPL) to determine program eligibility. The use of two sets of income criteria creates a barrier for AMF seeking to participate in EE&C programs due to the need to income qualify a second time. PA EEFA had some success in the Phase III Act 129 context to coordinate through PHFA, which already requires regular income recertification; however, income verification remains a challenge, particularly for AMF not funded through PHFA.

### **Pushback from the Commercial and Industrial Customer Advocates**

One particularly potent challenge has been the persistent pushback of commercial and industrial customers to EE. In Pennsylvania, the Industrial Customer Alliance has opposed Act 129 programming from its inception, and is actively seeking an “opt-out” for industrial customers (An Act 2017). This poses a significant threat to Act 129, which relies on full participation and funding from all rate classes to ensure that EE&C programming remains both sufficient and cost-effective.

The Office of Small Business Advocate (OSBA) has also opposed enhanced incentives for AMF participants, recommending that they should only be eligible for the same incentive treatment as any other C&I customer, rather than acknowledging that AMF is a fundamentally unique business with its own particular challenges. In the Phase III Act 129 proceeding, OSBA ultimately agreed to moderate enhancements to incentives for AMF properties. In Phase IV, PA EEFA intends to use data from Phase III and stories from AMF housing providers who have been unable to access EE programs to demonstrate the real needs of AMF and to advocate for deeper incentives.

## **Future Priorities for PA EEFA**

### **Health**

Health outcomes are determined by the conditions in which we live, and people who have poor housing conditions often have poor health outcomes. Too many adults and children end up in the emergency room, in prolonged hospital stays, and in nursing homes because of the poor conditions of their homes or because they lack any home at all. Poor housing can trigger an asthma attack, life on the streets can exacerbate existing and chronic illness, and the lack of accessible housing can mean unnecessary residence in a costly nursing home. There is potential to improve health while reducing health care costs through a collaborative approach in which health care and housing sectors align to increase access to safe, decent, and affordable homes.

Many energy efficiency upgrades to homes can also significantly reduce health hazards. PA EEFA intends to explore these overlaps and collaborate with health care providers, Managed Care Organizations, and state policy makers to advocate for more EE to be implemented to improve the health conditions of affordable housing.

### **Weatherization Assistance Program**

The Weatherization Assistance Program (WAP) has been successful in bringing EE to single family homes in PA since 1977 (Pa DCED 2018). During the ARRA federal stimulus,

WAP partnered with PHFA to weatherize multifamily buildings for a program titled Preservation Through Smart Rehab (CBEI 2014). Since ARRA funding ended, WAP has largely ignored multifamily buildings until this past year. PA EEFA hopes to work with DCED and weatherization providers to increase the participation of AMF buildings in WAP. The WAP program is “fuel neutral” meaning that unlike the utility programs of Act 129, gas measures and ventilation adequacy can be addressed. This means that it should be possible to achieve deeper savings through WAP than is possible through Act 129 programs alone.

### **Low-income Usage Reduction Program**

PA EEFA more recently began advocating for LIURP reforms in Universal Service and Energy Conservation Plan (USECP) proceedings as well as a statewide rulemaking proceeding (Pa Utility Commission 2016). In these proceedings, PA EEFA has advocated for LIURP’s high-usage threshold to be calculated on a square foot basis. This would allow more frequent treatment of individually metered AMF units through LIURP. To date, because of their smaller size, AMF units often have lower overall usage than single family homes, even if they have higher than average usage per square foot of living space. This has had the perverse consequence of rendering them ineligible for program services. PA EEFA has also advocated for much greater coordination between different utilities and across fuels to make the programs more cost-efficient and allow better service to be provided to more families.

### **Integration of LIURP, WAP, and Act 129 Programming**

PA EEFA’s goal of achieving energy savings in AMF housing can be accomplished more effectively through the integration of LIURP, Act 129, and WAP program delivery. Currently these programs largely operate in isolation, with the result that in some cases multiple programs will provide uncoordinated services to a single home in a short period of time, while still failing to achieve a comprehensive result. At the same time, other homes receive nothing due to budget limitations.

Integrated delivery has many advantages. Eliminating redundant administrative structures will save money for ratepayers and allow a greater portion of LIURP, Act 129, and WAP dollars to be devoted to providing services to customers. Providing customers with a single service delivery that provides efficiency services across all fuels in a single interaction will dramatically reduce confusion and fatigue among customers, increasing their willingness to participate in the programs. In turn, it will provide participants with the greatest possible benefits by reducing energy costs across multiple fuel sources and end uses.

### **Act 129, Phase IV**

The second year of Act 129 Phase III programming is currently underway, and the PUC will soon be assessing the potential for ongoing cost-effective savings. PA EEFA members are actively working to connect housing providers that are potential program participants with EDC programs to ensure that participation and savings for this sector meet expectations. PA EEFA is also working with PUC staff and the statewide evaluator to ensure that a robust assessment of the

potential for savings from AMF buildings across the state is completed before the PUC addresses AMF efforts in Phase IV planning.

## Conclusion

PA EEFA has made a real difference in the availability of EE programming for vulnerable households living in AMF housing in Pennsylvania. Significant work remains, including most prominently the better integration of the variety of programs that are provided under different mandates, with different rules, by different parties. The members of PA EEFA believe that continued success is possible, but know that it will take ongoing collaborative advocacy by the coalition.

## References

Act 129 of 2008. 66 Pa. C.S. § 2806.1-.2. (passed Oct. 15, 2008).

An Act (An Act amending Title 66 (Public Utilities) of the Pennsylvania Consolidated Statutes, in restructuring of electric utility industry, further providing for energy efficiency and conservation program). 2017. Senate 805.

CBEI (Consortium for Building Energy Innovation). 2014. *Energy & Water Savings in Multifamily Affordable Housing: Assessment of the Pennsylvania Housing Finance Agency's ARRA-funded Weatherization Program, Preservation through Smart Rehab*. Pittsburgh, PA: CBEI.

Drehobl, A., and L. Ross. 2016. *Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Low-income and Underserved Communities*. Washington, DC: ACEEE. [www.aceee.org/research-report/u1602](http://www.aceee.org/research-report/u1602).

EEFA (Energy Efficiency for All). 2015. *Pennsylvania: New Studies Identify Significant Energy Savings Potential*. Pennsylvania: EEFA. [www.energyefficiencyforall.org/sites/default/files/PA%20PS%20%20PDG%20Release%20F%20act%20Sheet.pdf](http://www.energyefficiencyforall.org/sites/default/files/PA%20PS%20%20PDG%20Release%20F%20act%20Sheet.pdf).

FSC (Fisher Sheehan and Colton). 2017. *2016 Home Energy Affordability Gap: Pennsylvania*. Belmont, MA. FSC. [www.homeenergyaffordabilitygap.com/](http://www.homeenergyaffordabilitygap.com/).

Hernandez, D. 2016. "Understanding 'Energy Insecurity' and Why It Matters to Health." *J. Social Science & Medicine* 167: 1-10. [www.ncbi.nlm.nih.gov/pmc/articles/PMC5114037](http://www.ncbi.nlm.nih.gov/pmc/articles/PMC5114037).

HUD (U.S. Department of Housing and Urban Development). n.d. *Affordable Housing*. [www.hud.gov/program\\_offices/comm\\_planning/affordablehousing/](http://www.hud.gov/program_offices/comm_planning/affordablehousing/).

NEADA (National Energy Assistance Directors' Association). 2011. *2011 National Energy Assistance Survey*. Washington, DC: NEADA. [www.neada.org/news/nov012011.html](http://www.neada.org/news/nov012011.html).

- Pa DCED (Pennsylvania Department of Community & Economic Development). 2009. *Pennsylvania ARRA Weatherization State Plan*. Harrisburg, PA: DCED.
- Pa DCED (Pennsylvania Department of Community and Economic Development). 2018. [www.dced.pa.gov/](http://www.dced.pa.gov/)
- Pennsylvania Code. § 58. (1993).
- PHFA (Pennsylvania Housing Finance Agency). 2018. *Pennsylvania Multifamily Housing Application Program Guidelines and Submission Requirements*. Harrisburg, PA. [www.phfa.org/mhp/developers/housingapplication.aspx](http://www.phfa.org/mhp/developers/housingapplication.aspx).
- Pa Public Utility Commission. 2009. *Act 129 Phase I Energy Efficiency and Conservation Program Implementation Order*. Docket No. M-2008-2069887.
- Pa Public Utility Commission. 2012. *The Act 129 Phase II Energy Efficiency and Conservation Program Implementation Order*. Docket No. M-2012-2289411.
- Pa Public Utility Commission. 2015. *Act 129 Phase III Energy Efficiency and Conservation Program Implementation Order*. Docket No. M-2014-2424864.
- Pa Public Utility Commission. 2016. *Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1-58.18*. Docket No. L-2016-2557886.
- Pa Public Utility Commission. 2017. *Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4*. Docket No. M-2016-2542415, at 55.
- Pa Public Utility Commission v. UGI Utilities, Inc. 2016. Docket No. R-2015-2518438. [www.ugi.com/wp-content/uploads/2016/10/Joint-Petition-for-Approval-of-Settlement-of-All-Issues.pdf](http://www.ugi.com/wp-content/uploads/2016/10/Joint-Petition-for-Approval-of-Settlement-of-All-Issues.pdf).