



August 15, 2025

Submitted electronically via: Docket Number M-2025-3052826 e-File

Matthew Homsher, Esq., Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Docket No. M-2025-3052826, Energy Efficiency and Conservation Program-Phase V, Plan Template

Dear Secretary Homsher,

On behalf of [Northeast Energy Efficiency Partnerships](#) (NEEP)¹, I am pleased to submit comments on the [Plan Template for Phase V of Act 129](#). NEEP is a non-profit with a mission to advance energy efficiency and related solutions in homes, buildings, industry, and communities.

We thank the Pennsylvania Public Utilities Commission (PUC) for the opportunity to provide input on the Plan Template. We commend the PUC for the work so far on Act 129 and the planning of Phase V. Energy efficiency programs are a critical tool to address rising costs and ensure reliable energy for residents and businesses across Pennsylvania. In addition to the recommendations below, NEEP has tools and resources available and can offer direct technical assistance to help in design and implementation.

Recommendations for Stakeholder Engagement and Involvement, Section 1.2 and 4.1.6

- *1.2 Summary description of process used to develop the Energy Efficiency & Conservation (EE&C) plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the Electric Distribution Companies (EDCs) process for stakeholder engagement.*
- *4.1.6 Provide a brief overview of how stakeholders will be engaged throughout Phase V. Describe how low-income communities and other marginalized populations will be represented in stakeholder engagement.*

Recommendation: Additional Opportunities for Stakeholder Engagement During the Planning and Implementation Process for Phase V. Additional opportunities could be offered for stakeholder engagement as EDCs draft EE&C Plans that fit the needs of the state and local communities served by Act 129. Additional opportunities for engagement can include: providing more targeted meetings and opportunities for engagement and providing educational materials or a presentation, such as public meetings with informational presentations and opportunities for verbal and written feedback. Providing these opportunities will allow stakeholders to

¹ These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners. NEEP is a 501 (c)(3) non-profit organization.



provide more targeted feedback. For example, EDCs could convene meetings on residential, low-income, and commercial parts of their portfolios to ensure opportunity for their customers to learn more about the plans and to take feedback on an improvements or considerations that might enable more success.

Stakeholder engagement plays a crucial role in shaping effective and equitable EE&C programs. Engagement from community members who are the most vulnerable provides greater knowledge, new solutions, and better procedures – all of which benefit not only the most vulnerable, but also everybody else. Feedback may include: developing program recommendations, identifying tracking metrics, and improving goals and performance incentives to encourage equitable program implementation. Program administrators can stay accountable and transparent by publishing progress reports, including graphics, on a public facing website. These progress reports should clearly define the goals, progress on the goals, and additional actions the program administrators must take to achieve those goals.

Several NEEP states have developed high-impact stakeholder processes that could serve as models, such as the Connecticut Department of Energy and Environmental Protection's [Equitable Energy Efficiency Proceeding \(E3\)](#) and the Massachusetts Energy Efficiency Advisory Council's [Equity Working Group \(EWG\)](#). As part of these processes, stakeholder feedback is collated and published, and written responses to each concern raised are published regularly.

Recommendations to Align IRA Home Energy Rebates with Act 129 Programs, Section 3.1.5

- *3.1.5 Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants. Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to electricity. Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.*

Implementing IRA Home Energy Rebates with existing energy efficiency programs provides [benefits for states, utilities, administrators, and customers](#) through combining funding streams, delivering consistent marketing messaging, and investing in long term market transformation in state programs. Without proper coordination and outlining of requirements for current program administrators, market confusion could cause customers to miss these opportunities. Below are recommendations and considerations as EDCs work to align Act 129 program offerings with other programs.

Recommendation: Establish a Consistent Qualified Product List. Coordination of IRA Home Energy Rebates - with Act 129 programs provides opportunities to streamline involvement for administrators, contractors, distributors, and other market actors, as all programs operate under the same structure. Establishing a qualified products list for Act 129 that aligns with IRA Home Energy Rebates programs and is applicable across the state can enable contractors and customers to stack funding, lowering initial upfront costs. Additionally aligning the



products in the two programs can help contractors that implement both programs by making one list that they will have to refer to for projects.

Recommendation: Coordinate with Key Stakeholders. Coordinate with stakeholders such as utilities, program implementers, and community agencies to line up a flow of funding and identify a pipeline for projects. Different entities implement energy efficiency programs within the state and have the potential to receive funding. The state can begin to coordinate with these various actors now to streamline program implementation. Meeting with stakeholders can identify who will be implementing IRA rebates and incentives and the best paths to implement some of the programs. This will allow the state to gain a better understanding of what resources already exist, where IRA funding can be leveraged to complement current state initiatives, and what roles different stakeholders will serve.

Recommendation: Identify Ways to Address Common Barriers to Participation: The IRA has incentives and rebates that are designed to provide benefits to low- and moderate- income residents. Yet funding is not the only barrier to participation for underserved communities. To help increase adoption, the state could explore additional initiatives that to address common barriers to participation such as prioritizing residents with deferrals and attempting to increase adoption among renters and landlords. Identifying ways to address these barriers with existing programs or additional funding, can alleviate some of the known hurdles that low- and moderate- income residents face and ensure that they have access to programs that will flow from the IRA.

Recommendation: Identify Ways to Attribute Savings from IRA and Other Non-Act 129 Programs Prior to Implementation. Attribution of savings is the practice of determining which entities or which programs receive credit for reductions in energy usage from energy efficiency interventions. Determining how to attribute savings when implementing programs that bring together two or more sources of funding is complex but not a new concept. Past programs have tackled the issue of attribution when implementing ARRA, integrating new initiatives like support for compliance with building energy codes, and combining state-level programs. For EDCs, there is uncertainty around the impact IRA Home Energy rebates will have on existing energy efficiency program portfolios and expected program outcomes—namely on whether they will reduce or increase savings. Identifying a method for attribution and outlining requirements for coordination prior to implementation can help to overcome this uncertainty and align priorities prior to implementation. For more on how to approach this issue, see NEEP's report [Expanding the Energy Savings Pie: Attribution Frameworks to Align IRA Home Energy Rebates and State Programs](#).

Conclusion

We thank the Pennsylvania Public Utility Commission for the opportunity to provide comments. These comments are intended to support the work currently underway with the implementation of Phase V of Act 129. In addition to these comments, NEEP is available to provide technical assistance to the PUC on Phase V and other energy efficiency policies and programs. If you have questions or would like additional information, please reach out to Erin Cosgrove, ecosgrove@neep.org.



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Sincerely,

Erin Cosgrove

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A handwritten signature in black ink, appearing to read 'Yiran He'.

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