



CENTER FOR COALFIELD JUSTICE

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April 22, 2024

Secretary Rick Siger
Department of Community and Economic Development
ra-wxmail@pa.gov

RE: United States Department of Energy (DOE) Weatherization Assistance Program (WAP) State Plan

Thank you for the opportunity to provide input on DOE WAP State Plan. The Center for Coalfield Justice (“CCJ”) respectfully submits the following comments.

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3)-status recognition located in Washington, PA. Our mission is to “improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health.” CCJ has over three thousand members and supporters and is governed by a volunteer Board of Directors. We offer the following comments.

1. Fund Braiding/Leveraging

We support combining multiple funding sources from similar weatherization programs to ensure that homes are holistically and thoroughly weatherized rather than being limited to an upper-cost limit/work constraints per home (which varies across programs). This also prevents a household from filling out time-consuming applications to multiple programs and multiple contractors coming into their home. This includes:

- braiding in LIHEAP Deferral Funds, which was included in this year’s plan;
- looking at ways to braid in IRA funding as it’s released; and
- Whole Home Repair coordination! Wherever WHR can be uplifted and braided in, it should be. We hope DCED will refer to the program in future plans.

2. Average Cost per Unit

We support the “average cost per unit” (ACPU) increase from \$8,009 to \$8,497. However, it should be increased further to ensure homes are being holistically served and to ensure that workers are paid living wages.

3. Deferral List

We highly recommend that DCED release publicly the deferral list with private/personal information redacted. If this type of data is released, it can help assess and respond to unmet needs for WAP services across the state – and to better understand the demand for such assistance.

4. Fuel Switching

DCED should identify a timeline to implement the energy modeling tool so low-income households have transparency on when they can take advantage of fuel switching to make their energy bills more affordable. Fuel-switching would also benefit the environment, so the sooner it is implemented, the better.

5. Health and Safety Policy

As climate change worsens, summers will get hotter, and storms will get more intense. The need for cooling and weatherization will only continue to grow. As the need grows, DCED must increase funding for these programs to protect Pennsylvanians.

Thank you for your consideration.

Respectfully,

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Community Advocate

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