

October 22, 2018



Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Second Floor
400 North Street
Harrisburg, Pennsylvania 17120

Re: Comments on Proposed Policy Statement Order dated 5/3/18, Docket No. M 2015 2518883

Dear Secretary Chiavetta:

Utility companies should not be rewarded with higher revenues when their customers waste energy or when extreme weather causes energy consumption to spike. The current practice of setting fixed rates for each unit of energy sold creates perverse incentives for utility companies to oppose installation of distributed solar and investment in energy efficiency. These are the same consumer investments that are critical if we are to confront our climate crisis.

Pennsylvania utility companies see the threat to their revenues that is posed by solar and energy efficiency, and have responded by requesting higher fixed customer charges to stabilize their revenues in the face of shrinking energy sales projections. Higher fixed charges are very regressive, hitting lower income consumers particularly hard. They also remove the financial incentive for every consumer to make investments or change behaviors that would reduce their energy consumption.

We strongly oppose the higher fixed customer charges. We support revenue decoupling as a better way to address the needs of utility companies for a predictable revenue stream and to also align with Pennsylvanians needs for affordable energy options. With proper design, revenue decoupling means that consumers who invest in efficiency and solar continue to see savings on their bill and utility companies get the revenue they need to maintain the distribution system. We believe that incentives should be built into rates that reward utility companies for helping customers be more efficient, for integrating solar systems seamlessly, for reliability of service, and for quality customer service. Failure to provide these services should result in refunds to customers.

It is time for utility companies to be evaluated and paid based on what their customers actually care about: the quality of the services they provide, not the number of kilowatt hours they deliver.

Sincerely,
The Undersigned

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