

CITIZENS'

Over a Century
of Service

Electric
COMPANY

November 26, 2018

Chairman Gladys M. Brown
Pennsylvania Public Utility Commission
Commonwealth of Pennsylvania
P.O. BOX 3265
Harrisburg, PA 17105-3265

Dear Chairman Brown,

As we head into the winter heating season, Citizens' Electric Company is taking the follow actions to assist low-income customers with their winter electric bills:

- 1. Improve efforts to link consumers to programs that are available to help them restore and maintain service such as CAP, LIHEAP and utility or local Hardship Funds.** *Although Citizens' does not have a CAP program, Citizens' Customer Service Representatives ("CSRs") provide information about Dollar Energy, our hardship fund for customers that are struggling to pay their electric bill. We also provide information about LIHEAP and SEDA COG's Home Weatherization Program. Our CSRs also give information regarding our community-based organizations ("CBOs") which can provide assistance to our low-income customers. Our website provides information about how to contribute to Dollar Energy as well as useful energy conservation measures our customers can take.*
- 2. Refer low-income consumers to CAP when they call to make payment arrangements, so they may also benefit from arrearage forgiveness if they qualify.** *Although Citizens' does not have a CAP program, we give our low-income customers every opportunity to make a reasonable payment arrangement to avoid termination. Adjustments can be made to this agreement as circumstances change.*
- 3. Restore service to low-income consumers upon enrollment into the company's CAP for the first time.** *Although Citizens' does not have a CAP program, we make every effort to restore low-income customers by providing payment arrangements and providing information regarding local CBO's.*
- 4. Exercise leniency when establishing payment arrangement plans for all consumers. Utilities have more discretion in making payment arrangements than does the Commission. When assessing whether to grant payment arrangement, please consider changes in circumstances such as lost or reduced income, extended illness of the ratepayer or a household member, or increased household size and accompanying expenses.** *Citizens' does exercise leniency to all customers when providing payment arrangements. We do consider household income, changes and expenses when we are setting up those arrangements.*

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5. **Increase corporate donations and fundraising for utility Hardship Funds and other local programs that assist consumers who need help paying their utility bills.** *Citizens' matches contributions to the Dollar Energy fund up to \$5,000. We provide information about donating to the Dollar Energy fund using bill messages, inserts, our website, and customer newsletters.*
6. **Review company procedures to ensure that automatic payments and online payments allow for consumer contributions to Hardship Funds.** *In addition to the procedures outlined in No. 5 above, online billed accounts automatically get notification of bill inserts and newsletters.*
7. **Limit the number of terminations of confirmed low-income consumers by scaling back the company's termination program as cold weather and the winter termination moratorium approach.** *This includes reviewing termination and reconnection procedures to allow consumers who are making a good faith effort to pay their bills to keep utility service whenever possible. Citizens' exercises leniency for all low-income customers. CSRs use good judgement to establish reasonable payment arrangements for customers struggling to pay their electric bills.*
8. **Waive or reduce security deposits, reconnection fees and late payment charges if they are a barrier to restoration of service or establishing a payment arrangement. If a security deposit or reconnection fee is necessary, consider adding it to the consumer's bill instead of making it an initial condition of providing service.** *Citizens' follows Chapter 56 Section 56.38 when requiring a security deposit which includes low-income customers. Citizens' does not terminate low-income customers during the winter so there are no reconnection fees. Normal billing procedures carry late fee forward.*
9. **Accept any combination of LIHEAP grant, crisis grant, and Hardship Fund grant as sufficient funds to initiate or reconnect service for low-income consumers. If a consumer payment is also necessary, we encourage you to be as lenient as possible.** *Citizens' accepts assistance payments to initiate service for low-income customers. There are no low-income winter terminations. During the 2017-2018 year, LIHEAP and various CBOs provided cash and crisis grants to our customers.*
10. **Provide customers with information about home heating safety and work to get consumers who have been "red tagged" the assistance or information needed to help in obtaining repairs to furnaces or heating systems. Refer low-income consumers to the LIHEAP crisis program for emergency repairs.** *Citizens' provides information about home heating safety on the Company website and through Company newsletters. CSRs, the Company website, newsletters and bill inserts provide information about payment assistance and crisis grant availability for home heating system repairs. Company correspondence with "red tagged" customers contains specific information about LIHEAP cash and crisis grants.*
11. **Promote the use of budget billing programs and third-party notification forms.** *Citizens' CSRs provide information about budget billing and third-party notification. This information is also distributed through Company newsletters and bill inserts as well as the Company's website.*
12. **Provide information to consumers regarding how they can reduce their heating costs through conservation, including information on weatherization programs as well as cost-effective steps they can do themselves.** *Citizens' CSRs provide information regarding energy conservation and*

weatherization programs. CSRs refer to SEDA COG's Home Weatherization Program. This information is also routinely provided in Company newsletters. There are energy efficiency and weatherization booklets and brochures available in the Company office which is mailed to customers upon request.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Eric W. Winslow". The signature is written in a cursive style with a large, prominent "E" and "W".

Eric W. Winslow,
President & CEO