

PPL Electric Utilities Corporation
2018 “Prepare Now” Campaign

In a letter dated November 6, 2018, the Commissioners urged utilities to participate in the annual “Prepare Now” campaign. PPL Electric Utilities Corporation’s (PPL Electric) responses to the various actions suggested by the Commission are as follows:

1.) Improve efforts to link consumers to programs that are available to help them restore and maintain service such as CAP, LIHEAP and utility and local hardship funds.

Response: PPL Electric implemented a variety of CAP outreach initiatives in 2018, including building onto our new OnTrack online application and adding an option to enroll customers by taking a phone application. LIHEAP outreach efforts included targeted mailings, phone campaigns, social media campaigns, e-mail reminders and bill messages. PPL Electric will run an email and phone campaign to over 100,000 low-income customers encouraging them to apply for LIHEAP benefits. A link on PPL Electric’s website allows customers to download the LIHEAP application and Customer Service Representatives (“CSRs”) also refer customers to the program. The Company will use social media as well to promote LIHEAP and utilizes the Mobile Assistance Vehicle to meet the customers in their communities to enroll them in LIHEAP and OnTrack. CSRs also refer customers to Operation HELP, which is PPL Electric’s hardship fund. The Company uses 15 human service agencies to administer the hardship fund program, which pays for any type of home energy bill.

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.

Response: When customers call to make payment arrangements, PPL Electric automatically refers eligible customers to CAP and can now direct them to the new phone enrollment line for OnTrack. The Company also integrated CAP into its call-flow process used by CSRs who handle collection-related calls. The initial referral to CAP stops all collection activities, including termination of service. In addition, if a customer uses PPL Electric’s website or IVR (“interactive voice response”) to set up a payment agreement, they will also be referred to CAP. To encourage participation in CAP, PPL Electric conducts a follow-up phone call for customers referred to the program.

3.) Restore service to low-income consumers upon enrollment into the company’s CAP for the first time.

Response: PPL Electric’s practice is to restore service to all low-income customers when the company is made aware that they are low-income. These customers can enroll in CAP at anytime.

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 a payment arrangement, please consider changes in circumstances such as lost or reduce income, extended illness of the ratepayer or a household member, or increased household size and accompanying expenses.

Response: The Company will waive any security deposit requirement for low-income households. For defaulted payment agreements, PPL Electric will negotiate to 50% of the total catch-up amount or 25% if there is a life event (such as those described above) affecting the household. The Company also encourages low-income customers to enroll in CAP to obtain benefits such as an

affordable payment plan, arrearage forgiveness and access to free weatherization services, including energy conservation education.

5.) Increase corporate donations to utility Hardship Funds and other local programs that assist consumers who need help in paying their utility bills.

Response: PPL Electric started Operation HELP in 1983 to assist low-income families in paying their energy bills. The program has seen a tremendous amount of success over the years assisting approximately 97,000 customers with donations of \$29.3 million. In 2018, the company continues to focus on raising money for the program. At this year's annual golf tournament in September, the company raised over \$50,000, the highest amount raised in the history of the event.

6.) Review company procedures to ensure that automatic payments and online payments allow for consumer contributions to Hardship Funds.

Response: Since 1983, customers have been able to contribute to Operation HELP via their electric bill. PPL Electric encourages monthly donation options of \$1, \$2 or \$5; however, the billing system has the flexibility to allow customers to donate any amount and, if requested, for specific periods of time (e.g., \$15 monthly over the winter). In addition, paperless billing customers can contribute to Operation HELP.

7.) Limit the number of terminations of confirmed low-income consumers by scaling back the company's termination program as the cold weather and the winter 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.

Response: In November, PPL Electric gives special consideration to households with vulnerable occupants (i.e., young children, elderly and disabled). PPL Electric monitors low temperature weather during the winter and does not complete termination work during low temperature periods. As part of the Commission's annual winter survey, the Company works diligently to reconnect all households before December 1, including providing an information packet about available assistance programs like CAP and LIHEAP. The Company accepts reduced amounts to restore service. During the last week of November, PPL Electric reviews all winter survey accounts not yet reconnected or verified as vacant. The Company conducts a special outreach campaign in an attempt to restore service to these accounts and typically has very few customers without service at the start of winter. PPL Electric makes every effort to reconnect residential customers' service before the start of winter.

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.

Response: PPL Electric does not charge security deposits for low-income residential customers. The Company includes a \$14 reconnection fee on customers' bills, but the charge is relatively low. PPL Electric will waive the reconnection fee under the appropriate circumstances. PPL Electric also waives late payment charges for low-income customers on payment agreements, for CAP participants and for LIHEAP recipients.

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.

Response: PPL Electric uses either LIHEAP grants or hardship fund grants to stop termination or to reconnect service for low-income households. The Company will accept a minimum payment as low as \$50 to reconnect service prior to winter. PPL Electric will also negotiate a lower catch-up amount to reconnect service if customers have experienced critical life events (e.g., job loss, death of primary wage earner or unexpected medical problems) or have demonstrated a good-faith effort to pay their bills.

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.

Response: “Red tagged” situations apply to customers who heat their homes with natural gas. However, PPL Electric has established an inter-utility coordination process to refer customers who heat with natural gas to UGI’s Low-Income Usage Reduction Program (“LIURP”) or to LIHEAP crisis.

11.) Promote the use of budget billing programs and third-party notification forms.

Response: The Company has offered budget billing and third-party notification programs for many years. In addition to offering budget billing when negotiating payment plans, PPL Electric promotes the program annually in a bill insert to all customers. As of October 31, 2018, there were approximately 245,000 customers enrolled in budget billing (about 20% of all residential customers), and approximately 30,000 customers enrolled in the third-party notification program.

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.

Response: PPL Electric’s CSRs will continue to refer low-income customers to WRAP, which is the Company’s LIURP and Act 129 low-income direct-install energy efficiency program. PPL Electric has promoted WRAP through bill inserts, call campaigns, targeted mailings, the PPL website, and other means. In addition, CAP customers with high electric usage are automatically enrolled into the program. WRAP contactors will continue their efforts to refer customers to the state Weatherization Assistance Program for additional services, including furnace repair or replacement. In addition to WRAP, PPL Electric will continue offering energy efficiency kits and education through Act 129.

PPL Electric’s Online Energy Assessment allows residential customers to create a home profile of their energy usage. Using the Online Energy Assessment allows customers to understand how and when they are using energy, as well as to receive no cost/low cost tips to reduce their usage. Through PPL Electric’s website, customers can view information on all energy efficiency programs the Company offers under its Act 129 plan. The various Act 129 programs help customers save energy. In addition, PPL Electric communicates energy savings tips to customers through various channels including the Connect newsletter included with all bills.

November 13, 2018