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December 13, 2016

Rosemary Chiavetta
Secretary, Public Utility Commission
400 North Street, Keystone Bldg.
Harrisburg, PA 17120

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PA P.U.C.
SECRETARY'S BUREAU

**RE: PECO Energy Company's Pilot Plan for an Advance Payments Program
PUC Docket No. P-2016-2573023**

Dear Secretary Chiavetta,

The Philadelphia Workers Benefit Council, speaking on behalf of more than 20,000 low-paid service worker households, opposes PECO Energy Company's proposal to implement a pilot program for "Prepaid Electric Service," currently pending at PUC Docket No. P-2016-2573023.

Philadelphia Workers Benefit Council is a representative body of low-paid service, temporary, part-time and out-of-work workers in Philadelphia. This issue is of particular importance to us. PECO's proposal will pressure customers in debt, disconnected from service and others to give up some of the few protections against rapid service disconnection that the law still allows under the guise of a "more affordable" product.

Delegates from the Philadelphia Workers Benefit Council have testified at PUC Public Input hearings for more than 20 years, entering testimony over and over again from low-income service workers at hearings and in written petitions about the tragic consequence of raising rates. The PUC is allowing more and more of our lowest paid workers and those who are on fixed incomes to fall in debt due to unsustainable rate hikes which has led to statewide fatalities from utility shutoffs tripling in the last ten years, according to the PUC's own data compilation. The number of Pennsylvania households that have had their service terminated by the state's regulated gas and electric utilities rose from an annual average of 81,000 in the 1990's to 312,000 in 2014 -- nearly four times higher, per reports from Penn Live Analysis. The PUC and state legislature are increasing utility companies' profit at the expense of brutal shutoffs of low-income ratepayers who are suffering a reduction of income from the largest economic collapse of the last 70 years.

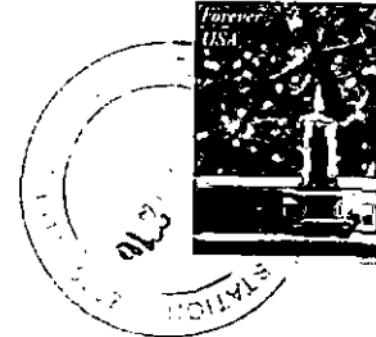
We have stated our position consistently: STOP THE SHUTOFFS! This new, so-called voluntary service plan will result in more shutoffs at lower expense to the utility by enticing the customer to sign away what few remaining protections they have under current service requirements. It will mask from public view even more shutoffs of people who can no longer afford utilities at the current rates that would be counted instead as "voluntary discontinuation," when customers stopped making payments on their account.

We call on the PUC to enact policies based on Pennsylvania law which states that electric service is essential to the health and well-being of residents, to public safety and to orderly economic development, and that electric service should be available to all customers on reasonable terms and conditions [66 Pa. C.S. § 2802(9)]. The PUC should instead focus their energy on sustainable and inclusive solutions to this affordability crisis. Cancel shutoffs for those under 250% of the Federal Poverty Level to ensure life-sustaining service year-round.

Sincerely,

Bernard Reed
President of Philadelphia Workers Benefit Council

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