



February 22, 2018

Via Electronic Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PPL Electric Utilities Corporation Universal Service and Energy Conservation Plan
for 2017-2019, Docket No. M-2016-2554787
Request for Approval of USECP addendum**

Dear Secretary Chiavetta,

Enclosed please find the Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) in the above referenced proceeding. Copies of this filing are being provided in accordance with the attached Certificate of Service.

Please feel free to contact me directly should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kadeem Morris".

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Enclosures

cc: Joseph Magee, BCS (via email)
Lori Mohr, BCS (via email)
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal
Service and Energy Conservation Plan for
2017-2019

Docket No. M-2016-2554787

CERTIFICATE OF SERVICE

I hereby certify that I have this day, February 22, 2018, served copies of the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** to the February 14, 2018 Secretarial Letter.

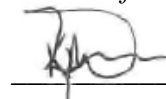
VIA EMAIL & FIRST CLASS MAIL

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Dated: February 22, 2018.

Respectfully submitted,
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal
Service and Energy Conservation Plan for
2017-2019

Docket No. M-2016-2554787

**COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)**



The Pennsylvania Utility Law Project

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**On behalf of the Coalition for Affordable Utility
Services and Energy Efficiency in Pennsylvania**

February 22, 2018

I. INTRODUCTION AND BACKGROUND

CAUSE-PA, through its counsel at the Pennsylvania Utility Law Project, files these comments in response to the Pennsylvania Public Utility Commission (PUC or Commission) February 14, 2018 Secretarial letter, which invited interested parties to submit comments to the Addendum to PPL Electric Utilities Corporation's 2017-2019 Universal Service and Energy Conservation Plan (USECP).

CAUSE PA has been an active participant throughout the course of this proceeding. On June 7, 2017, CAUSE-PA filed Comments to PPL's proposed USECP. In relevant part, CAUSE-PA asserted that customers with zero income should be eligible for OnTrack, and explained that "by not enrolling [zero income] households in OnTrack, PPL places them in the unwinnable situation of having to come up with the full tariff bill each month." (CAUSE-PA Cmts. at 33-34; Order at 41). The Office of Consumer Advocate (OCA) also filed Comments asserting that PPL should accept zero income applicants into OnTrack. (OCA Cmts. at 12-14). On June 22, 2017, PPL filed Reply Comments, in which it agreed to amend its policy to "allow customers reporting zero income to enroll in OnTrack." (PPL Reply Cmts at 8-9; Order at 41).

On October 5, 2017, the Commission issued an Order in this proceeding, which approved PPL's agreed amendment "to allow customers reporting zero income to enroll in OnTrack," and required PPL to "work with its newly formed universal service stakeholder group to draft a zero income form and establish parameters for households enrolled with zero income." (Order at 42).

On January, 25, 2018, counsel for CAUSE-PA participated in PPL's Universal Service Stakeholder meeting, and provided feedback to PPL on its proposed zero income form.

Unfortunately, CAUSE-PA's concerns with PPL's treatment of zero income applicants were not fully addressed, and are explained in Comments below.

II. COMMENTS

CAUSE-PA has three concerns about the implementation of the PPL's new zero income policy and verification form as proposed. First, CAUSE-PA is concerned about strict adherence to the requirement that the form be complete in order to be accepted. The form, as presented, contains several open ended questions that may be intentionally left blank, even though the customer has submitted all of their income information. Second, PPL's proposed implementation plan for paper applications would require the applicant to fill out an OnTrack application and indicate that they have zero income; thereafter, the customer would be mailed a zero income form by the OnTrack Agency. This process is needlessly cumbersome and may result in unnecessary termination of service during the pendency of the application. Third, CAUSE-PA requests clarification from PPL about whether it intends to enroll customers in OnTrack when they have truly zero income, and indicate on the form that they do not know how they will be paying their bills.

A. Completeness of the Form

As currently proposed, PPL would enroll a zero income customer in OnTrack, so long as they have submitted a completed zero income form. The form, as presented, contains several open-ended questions that require the applicant to indicate how they are meeting their basic living expenses (including food, housing, and utilities), along with a disclaimer that failure to provide this information would be grounds for denial or dismissal of the application.

PPL should be lenient in its assessment of whether an applicant has “completed” the zero income form. A household may leave questions unanswered because that household truly has no idea how they will be paying for housing or food within the coming weeks or months. This fact, by itself, should not render the form incomplete. Many low income households survive on seasonal or unreliable employment, or are recently unemployed and are unsure how they will pay for basic living expenses. This fact was addressed in CAUSE-PA’s initial Comments in this proceeding, which led to PPL’s inclusion of zero income applicants:

It might not always be clear to a household where their income is coming from or whether that income is definite. Households who have no stable source of income may nonetheless be able to scrape together funds that would allow them to remain current – or not too far behind – on their essential bills such as rent and utilities. When these households are able to find resources to pay their OnTrack bill, they have some source of funds that they could disclose to PPL to avoid being labeled a zero income household. However, the uncertainty involved with how they will pay these bills month to month may not allow them to predict with any certainty where or how much they can count on.

(CAUSE-PA Cmts. at 33-34). A strict application of the rule of completeness would do more harm than good to these households. So long as there is sufficient information on the form to allow PPL or its OnTrack agencies to explain the household’s zero income status, the form should not be rejected for incompleteness. If there are sections of the form which are left blank and require further explanation, the OnTrack agency processing the application should contact the applicant to inquire about the blank fields before rejecting the application.

B. Delays for Paper Applications

As currently proposed, a zero income customer applying for OnTrack through the mail would be identified by the OnTrack agency, and then mailed a separate zero income form to complete and return to the agency. This process will likely create unnecessary delay in the

processing of the applications. In the feedback submitted to PPL we proposed the inclusion of the following language:

“For paper applications, PPL will stop pending termination activities on the customer’s account for a period of 15 days from the date of the initial application to allow the applicant to complete and return the zero income form.”

The proposed language includes an additional 15-day suspension of termination activities to prevent unnecessary and costly termination during the pendency of the OnTrack application period. CAUSE PA believes this additional time is warranted, and would prevent unnecessary reconnection fees which, ultimately, would increase the cost of the program. In the alternative, CAUSE-PA proposed that the OnTrack application packet include a zero income form, and that customers be prompted to fill it out if they are reporting zero income. This process is consistent with CAUSE-PA’s understanding of the way the online application process will work:

Applicants will be automatically prompted to complete the zero income form when they indicate that they have no income.

C. Definition of Zero Income

At the stakeholder meeting hosted by PPL, a PPL employee stated that if the household truly has no income and no idea how they are paying their bills they will not be eligible for OnTrack. Based on this assertion, CAUSE-PA is concerned that PPL will reject households who do not have any income and state on the form that they do not know how they will pay their bills based on PPL’s belief that they will not be able to pay the minimum OnTrack bill. Indeed, it is the very same assertion that PPL made in its initially proposed USECP in support of its decision to reject zero income applicants. (Order at 40; Proposed USECP at 9).

The OnTrack Lifestyles programs is designed for customers facing significant short term hardships that affect their ability to pay their bill, and participants must recertify every 9 months.

Low income households are constantly in flux. Their inability to identify a resource to pay for their living expenses at one point in time – when they are seeking assistance from PPL through OnTrack – does not mean that they won't figure it out the next month or the next week. These households should not be categorically excluded from OnTrack enrollment. To do so would undermine the Commission's requirement that PPL accept zero income customers.

Indeed, PPL already counts receipt of family support or grant assistance as income under its prior USECP. So, if it were allowed to reject applicants with truly zero income, its existing policy would continue unchanged. The household's obligation should be to complete the form honestly and their honesty about their present uncertainty about how their bills will be paid should not exclude them from a program that will reduce their bill and help address accrued arrearages, thereby making it easier to pay.

III. CONCLUSION

CAUSE-PA thanks the Commission for this opportunity to submit comments to the PPL's Addendum to its 2017-2019 Universal Service and Energy Conservation Plan and respectfully requests that the Commission require PPL to modify and/or clarify its Addendum consistent with the comments presented herein.

Respectfully Submitted,

Pennsylvania Utility Law Project
On Behalf of CAUSE-PA



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