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E-File

March 2, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

**RE: PPL Electric Utilities Corporation's Universal
Service and Energy Conservation Plan for 2017-2019,
Docket No. M-2016-2554787**

Dear Secretary Chiavetta:

Enclosed please find the Reply Comments of PPL Electric Utilities Corporation in the above-referenced proceeding. These Reply Comments are being filed pursuant to the Secretarial Letter issued February 14, 2018.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on March 2, 2018, which is the date it was submitted electronically via the Commission's E-Filing System.

If you have questions, please contact me directly (610/774-4254) or Melinda Stumpf, PPL Electric's Manager-Regulatory Programs & Business Services, at 484/634-3297.

Sincerely,

A handwritten signature in blue ink that reads "Amy E. Hirakis". The signature is written in a cursive, flowing style.

Amy E. Hirakis

Enclosure

cc: Mr. Joe Magee
Ms. Sarah Dewey
Ms. Louise Fink Smith
Certificate of Service

CERTIFICATE OF SERVICE

(Docket No. M-2016-2554787)

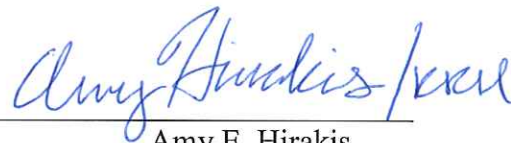
I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL AND EMAIL

Patrick Cicero, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Representing CAUSE-PA

Christy Appleby
Office of Consumer Advocate
555 Walnut Street
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Forum Place
Harrisburg, PA 18101

Date: March 2, 2018



Amy E. Hirakis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2554787
2012-2019 Submitted in Compliance with 52 :
Pa. Code § 54.74 :

PPL Electric Utilities Corporation's
Reply Comments

I. INTRODUCTION

On February 5, 2018, pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order entered October 5, 2017 in the above referenced proceeding, PPL Electric Utilities Corporation ("PPL Electric" or the "Company") filed an addendum to its 2017-2019 Universal Service and Energy Conservation Plan ("Plan") and the Company's proposed "Zero Income Form." The addendum provided PPL Electric's policy for enrolling customers reporting zero income into the OnTrack program. On February 14, 2018, the Commission issued a Secretarial Letter inviting interested parties to submit comments to the Company's addendum and proposed zero income form. On February 22, 2018, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed comments. PPL Electric submits these reply comments to respond to the comments filed by CAUSE-PA.

II. COMMENTS

In the underlining proceeding, PPL Electric voluntarily sought to revise its proposed Plan to permit customers with zero income to enroll in OnTrack.¹ As provided in the Company's

¹ See PPL Electric's Reply Comments filed on June 22, 2017, at 8, 17.

Reply Comments submitted June 22, 2017, PPL Electric agreed with the arguments raised by other parties that customers with zero income may have other means to make payment for their electric service, particularly if customers receive a discounted payment as part of being enrolled in OnTrack. As part of the Company's decision to permit customers with zero income to participate in OnTrack, PPL Electric proposed developing a zero income form for these customers to complete as part of the OnTrack application process.

On October 5, 2017, the Commission approved PPL Electric's proposed modification to its Plan. Specifically, the Commission provided as follows:

We support PPL's proposal to allow customers reporting zero income to enroll in OnTrack. As noted by OCA, other EDCs allow customers who report no source of income to enroll in CAP if they provide documentation of how they meet monthly expenses. Duquesne Light and the FirstEnergy Companies (Metropolitan Edison Company [Met Ed], Pennsylvania Electric Company [Penelec], Pennsylvania Power Company [Penn Power], and West Penn Power [WPP]) enroll a household reporting zero income into CAP if the household provides a statement explaining how living expenses are met.²

The Commission directed PPL Electric to develop a zero income form, establish program parameters for these customers, hold a stakeholder meeting, and file an addendum to the Plan.³

On January 25, 2018, PPL Electric met with stakeholders and presented the proposed zero income form, collected feedback on the form, and incorporate changes based on that feedback.

On February 5, 2018, PPL Electric filed the addendum and proposed zero income form. The addendum states that "OnTrack is now available to customers with zero income, as long as they submit a 'Zero Income Form' which states how they are meeting their basic expenses." The form itself requests that customers state how they are meeting the following basic needs – food, housing, and utilities.

² October 5 Order at 40-41.

³ October 5 Order at 41.

On February 22, 2018, CAUSE-PA filed comments making three recommendations regarding the Company's addendum and zero income form: (1) "PPL Electric should not reject the form so long as there is sufficient information on the form that explains the household's zero income status;"⁴ (2) PPL Electric should suspend pending termination activities for 15 days to allow customers to complete and submit the zero income form; or in the alternative, include the zero income form with the Ontrack application⁵; and (3) Customers that cannot identify how they meet their basic needs (i.e., food, housing, and utilities) should not be excluded from participating in OnTrack⁶.

PPL Electric believes that its addendum and proposed form are consistent with CAUSE-PA's first and third recommendation, but concedes that how the Company's intends to use the form could use clarification. PPL Electric intends to enroll customers with *zero income* into OnTrack, meaning that customers do not need to identify resources on the zero income form if none exist. However, even when customers have no resources to meet basic needs (i.e., food, housing, and utilities), the customer is expected to complete the form by stating this on the form. PPL Electric submits that neither its addendum nor its proposed form need to be revised, as these documents are consistent with the Company's intent with enrolling customers with zero income and the October 5th Order.

Regarding CAUSE-PA's recommendation that PPL Electric should suspend termination activities for 15 while customers complete the zero income application, or in the alternative include the forms with the OnTrack application, the Company strongly opposes both recommendations. PPL Electric made the determination not to include the zero income form with the OnTrack application as a way to reduce the risk of fraud. In order to reduce the overall

⁴ CAUSE-PA Comments at 3.

⁵ *Id.* at 4.

⁶ *Id.* at 4-5.

cost of the OnTrack program, PPL Electric needs customers with income to identify that income. PPL Electric submits that reserving the zero income form for just the customers who identify themselves as having no income will reduce the opportunity for customers with incomes from simply completing and submitting the zero income form. Further, as provided in the addendum, if a customer applies online, the customer can complete the zero income form immediately upon entering zero in the income field. PPL Electric submits that in the case of a customer facing imminent termination, the quickest method for that customer is to apply for OnTrack using the online application. Further, PPL Electric expects to start its telephonic OnTrack application in 2018, which will be another method for customers to enroll in OnTrack quickly without mailing delays.

III. CONCLUSION

PPL Electric appreciates the opportunity to respond to the comments submitted by CAUSE-PA. PPL Electric submits that its zero income addendum and form are consistent with the Commission's October 5, 2017 Order and the Company's intent to enroll customers with zero income into OnTrack. PPL Electric respectfully requests that its addendum and form be approved.

Respectfully submitted,

Handwritten signature of Amy E. Hirakis in blue ink, with a horizontal line underneath.

Kimberly A. Klock (ID #89716)

Amy E. Hirakis (ID #310094)

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Date: March 2, 2018