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October 4, 2019

VIA ELECTRONIC FILING

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

Re: Chapter 56 Working Group; Docket No. L-2015-2508421

Dear Secretary Chiavetta:

On August 28, 2019, the Pennsylvania Public Utility Commission (“Commission”) issued a Secretarial Letter initiating a working group to discuss three outstanding issues from the Chapter 56 rulemaking process: (1) medical certificate format; (2) changes to the procedures for victims of domestic violence; and (3) privacy guidelines related to electronic messaging during the service disconnection process. Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “Companies”) intend to participate in this working group and attend the initial meeting scheduled for October 29 at the Commission.

At this preliminary stage of the working group process, the Companies do not have any proposed changes related to items (2) and (3) above. The Companies believe Chapter 56 provides sufficient explanation regarding the protections that apply to victims of domestic violence. In addition, the Companies do not currently utilize electronic messaging to customers during the service disconnection process and therefore do not have any proposed changes related to such procedures.

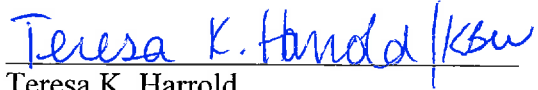
Regarding item (1), however, the Companies have a few suggestions related to medical certificate format. The Companies have a number of high balance accounts where customers obtain medical certificates and file informal and formal complaints to avoid service termination while making few, if any, payments on their accounts. Under Chapter 14 of the Public Utility Code, the Companies are obligated to take efforts that reduce the number of accounts with balances over \$10,000.¹ In recognition of this statutory obligation, the Companies remain concerned that certain customers may seek to use medical certificates as a method for postponing service termination despite not having an underlying medical condition. To guard against this situation, a

¹ See, e.g., 66 Pa.C.S. § 1410.1(3).

medical certificate should always be signed and in writing either on a form provided by the utility or on the letterhead of a physician, nurse practitioner, or physician's assistant. In addition, medical certificate forms should be made available upon request of the utility rather than available for download at the utility's website. Finally, medical certificate forms should include the license number of the physician, nurse practitioner, or physician's assistant to increase the likelihood that the medical professional is the individual who filled out the form.

The Companies appreciate the opportunity to provide feedback on these important issues and look forward to further participation during the working group process.

Very truly yours,



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Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Chapter 56 Working Group

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Docket No. L-2015-2508421

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below.

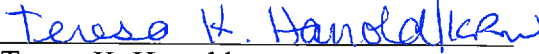
Service by first class mail, as follows:

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Dated: October 4, 2019


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