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E-FILE

February 21, 2020

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

**Re: 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa.
Code § 69.261-69.267 – M-2019-3012599
Docket No. M-2016-2554787**

Dear Ms. Chiavetta:

This letter is being filed pursuant to the February 6, 2020 Order on Reconsideration and Clarification in response to the Petition of Energy Association of Pennsylvania for Reconsideration/Clarification of the November 5, 2019 Final CAP Policy Statement and Order at Docket No. M-2019-3012599 (EAP Petition at Docket No. P-2020-3016889). Per the Order, utilities were directed to file at the utility's USECP docket (M-2016-2554787) a letter indicating the provisions in the CAP Policy Statement with which the utility is already compliant and which new provisions the utility will be addressing at a later date. The table below shows the status of the various provisions with regard to PPL Electric Utilities Corporation's ("PPL Electric") current USECP.

CAP Policy Statement Provision	PPL Electric Currently Compliant	To Be Addressed in PPL Electric's April 2022 USECP Filing
1. a. Establish new maximum tiered CAP energy burdens of 6% for natural gas heating, 4% for electric-non-heating, and 10% for electric hearing for FPIG tiers 51%-100% and 101%-150%. For FPIG tier 0%-50%, the maximum energy burdens should be 4% for natural gas heating, 2% for electric non-heating, and 6% for electric heating.		X
b. Minimum CAP payment requirements should be set in USECP proceedings rather than in the CAP Policy Statement. Utilities may propose alternatives to a flat minimum payment for each account type, such as basing them on the household's FPIG level.		
2. Utilities should allow CAP households to retain CAP enrollment when they transfer service within the utility's (or an affiliate's) service territory.	X	

3. Utilities should accept income documentation of at least the last 30 days or 12 months, whichever is more beneficial to the household, when determining CAP eligibility at application or recertification. CAP applications and recertification letters should identify acceptable income timeframes and explain how each may benefit the customer.		X
4. Eliminate the provision in the CAP Policy Statement that low-income customers must be “payment-troubled” to qualify for CAPs.	X	
5. Eliminate the provision in the CAP Policy Statement that a customer should designate the Low Income Energy Assistance Program (LIHEAP) grant to the utility sponsoring the CAP or be penalized for not applying for LIHEAP.	X	
6. Utilities should exempt CAP customers from late payment charges.	X	
7. Utilities should provide CAP customers with (a) pre-program arrearage (PPA) forgiveness for each on-time and in-full monthly CAP payment regardless of in-CAP arrears and (b) retroactive PPA forgiveness for any month(s) missed once the household pays its in-CAP/in-program balance/debt in full.	X	
8. Utilities may request Social Security numbers but not require them for household members when verifying identity for CAP enrollment.	X	
9. Maximum CAP credit limits should be set in USECP review proceedings rather than in the CAP Policy Statement and should consist of a tiered structure based on the household’s FPIG level (i.e., 0-50%, 51-100%, and 101-150%) which should provide lower income households with higher CAP credit limits. Utilities should notify CAP customers when they approach their credit limits, instruct them to contact the utility if they meet any exceptions, and refer them to LIURP (if eligible).	X	
10. Utilities should establish online CAP applications and allow customer to submit documentation electronically.	X	
11. Utilities should use a standardized zero-income form and develop other industry-wide standardized forms.	X	
12. Establish new maximum recertification timeframes for CAPs and strive to minimize disruptions in CAP participation. <ul style="list-style-type: none"> • CAP households reporting no income should be required to recertify at least every six (6) months regardless of LIHEAP participation; • CAP households with income that participate in LIHEAP annually should be required to recertify at least once every three (3) years; • CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions should be required to recertify at least once every three (3) years; and • All other CAP households should recertify at least once every two (2) years. 	X	X ¹

¹ PPL Electric is partially compliant with item 12. Currently, PPL Electric does not require that CAP households reporting no income recertify at least every six (6) months regardless of LIHEAP participation. PPL Electric also does not require CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions to recertify at least once every three (3) years. However, PPL Electric’s current USECP complies with the remainder of item 12.

13. Utilities should initiate collection activity for CAP accounts when a customer has no more than two (2) in-program payments in arrears. Customers should not be removed or defaulted from CAP as a precursor to termination for non-payment.		X
14. Utilities should evaluate household CAP bills at least quarterly to determine whether the customer's CAP credit amount or billing method is appropriate.		X
15. Utilities should work with stakeholders to develop Consumer Education and Outreach Plans.	X ²	
16. Utilities should use the definition of "household income" in Chapter 14 of the Public Utility Code.		X

Pursuant to 50 Pa. Code § 1.11, the enclosed document is deemed filed on February 21, 2020, which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me or Melinda Stumpf, Manager-Regulatory Programs/Business Services for PPL Electric at (484) 634-3297.

Respectfully submitted.



Michael J. Shafer

cc via email: Joseph Magee
Jennifer Johnson
Christina Chase-Pettis
Shari A. Williams
Louise Fink Smith

² Consumer Education and Outreach Plans will be added to the agenda of PPL Electric's semi-annual stakeholder meetings.