E-File

June 15, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

Request for Utility Information
Docket No. M-2020-3020055

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") are responses to the inquiries contained in the May 29, 2020 Secretarial Letter referenced above.

In accordance to the guidelines in the May 29, 2020 Secretarial Letter, certain portions of this response have also been sent to Sarah Dewey of the Bureau of Consumer Services and Tom Charles, Director of Communications.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is deemed filed on June 15, 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.

Respectfully submitted,

[Signature]

Michael J. Shafer

Enclosure

cc: Sarah Dewey – via email
    Tom Charles – via email
Termination of Utility Service

After the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

- How does the utility plan to implement terminations and will it start the process with new termination notices?

PPL Electric’s Response:

PPL Electric recommends that the Commission lift its Emergency Order on July 10, 2020. This is the date originally suggested in the May 20, 2020 letter to Governor Wolf from various consumer advocate stakeholders. PPL Electric believes ending the Emergency Order on July 10, 2020 strikes a balance between protecting customers who have been impacted by COVID-19, and not allowing utility bill arrearages to balloon to unsustainable levels. Also it should be noted that under PPL Electric’s proposed plan detailed below, actual terminations would not occur until after PPL Electric has made several attempts to contact and assist payment troubled customers, and the required pre-termination notifications.

PPL Electric has developed a COVID-19 specific collection strategy to assist payment troubled customers. All terminations will be treated as new terminations with the notice process restarting. Prior to any termination notices being sent, there will be a series of customer outreach attempts to negotiate payment arrangements with customers. There will be a dedicated team of customer service representatives who will perform this outreach program.

The pre-termination notice customer outreach will consist of three attempts to contact the payment troubled customer. The first attempt will be an automated outbound call which will include a payment reminder, information regarding help with bill payment, and notice that a live agent will also be calling. The second attempt will be a live agent outbound
call which will occur 3-5 days after the automated call. The CSR will provide the customer with the same information from the automated call and attempt to negotiate a payment arrangement. If the second attempt is unsuccessful there will be another live agent outbound call 3-5 days after the second attempt. The Company will only start the termination process if it is unable to enter into a payment arrangement with the customer after the three customer outreach attempts.

In addition to payment arrangements, the CSRs will be authorized to enter into Special Agreements with customers. A Special Agreement is an agreement that breaks a large balance down into monthly installments that is not solely based on income levels or minimum installment terms, like a regular company payment arrangement would be. The customer can offer an amount to pay initially, if they are able, but payment is not required. All customers who are currently late on their bill or have a past due balance are eligible for a Special Agreement. Special Agreements are a one-time offering, and if the Special Agreement is defaulted on, residential customers would be eligible for a regular payment arrangement. The Company will offer Special Agreements during one of the outbound customer outreach calls.

PPL Electric will start the customer outreach program with Level 3, 4, commercial customers, and customers for whom the Company does not have income information. It is anticipated that this phase will take several weeks. After the first phase the Company will start the customer outreach program for Level 1 and 2 customers. The communications to Level 1 and 2 customers will be refined by lessons learned from the first phase of customer outreach. Also, there will be added emphasis on informing Level 1 and 2 customers about universal service benefits that they may be eligible for. The exact timing of this customer outreach program will depend on when the Commission’s moratorium under the Emergency Order on Terminations is lifted.

It is important to note that it is PPL Electric’s preference to take a gradual approach to restarting terminations as outlined in the above customer outreach proposal. As discussed, this process will take several weeks to implement, and potentially several more weeks after the customer contacts are made to finalize the payment arrangement, Special Agreement, or enroll the customer in an appropriate universal service program. If the moratorium is lifted at a time closer to the winter moratorium PPL Electric may not have enough time to utilize the outlined gradual approach and instead have to take a more expedited approach to terminations.
Termination of Utility Service

Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
- Provide future projections if available.

PPL Electric’s Response:

The data below compares the number of payment troubled customers from May 2019 to May 2020. The Company does not have any future projections on how these numbers will change going forward in 2020.

2019 – Total Customers All Classes - 104,832
2020 – Total Customers All Classes - 118,611
13.1% increase over the prior year

<table>
<thead>
<tr>
<th>Customer Class</th>
<th>Low Income?</th>
<th>Account Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-residential</td>
<td>N/A</td>
<td>3,509</td>
</tr>
<tr>
<td>Residential</td>
<td>N</td>
<td>31,682</td>
</tr>
<tr>
<td>Residential</td>
<td>Y</td>
<td>69,641</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Customer Class</th>
<th>Low Income?</th>
<th>Account Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-residential</td>
<td>N/A</td>
<td>5,890</td>
</tr>
<tr>
<td>Residential</td>
<td>N</td>
<td>38,320</td>
</tr>
<tr>
<td>Residential</td>
<td>Y</td>
<td>74,401</td>
</tr>
</tbody>
</table>
Termination of Utility Service

Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

**PPL Electric’s Response:**

No, the Company is not currently charging reconnection fees. PPL Electric proactively contacted customers who were terminated prior to the Commission’s Emergency Order and offered to reconnect these customers. The Company did not charge a reconnection fee to these customers to restore service.
**Universal Service Programs:**

Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**PPL Electric’s Response:**

No, since the Commission’s issuance of its Emergency Order on Terminations, PPL Electric has not been removing customers from CAP for non-payment or failure to recertify.
Universal Service Programs:

What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g. waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

PPL Electric’s Response:

PPL Electric has made several changes to its Hardship Fund (Operation HELP) in light of the COVID-19 pandemic. Operation HELP was traditionally a program where the customer was directed by PPL Electric to apply at the CBO with most applicants applying in person for the grant. As a result of COVID-19, PPL Electric updated the application process to use one application for both OnTrack and Operation HELP. Customers are now directed to apply over the phone, online, or to use a mailed application. PPL Electric has stopped directing customers to the agencies for program funds. Rather, PPL Electric has updated its website, internal procedure, and CBO procedure to clarify that any customer completing an assistance application should be evaluated for OnTrack and Operation HELP. Prior to COVID-19, Operation HELP was only available to customers at or below 200% of FPL, but PPL Electric petitioned for a waiver to increase income guidelines from 200% of FPL to 250% of FPL, which was approved by the PUC. Additionally, customers needing assistance who are above 250% FPL can be referred to PPL Electric’s CARES program. And lastly, the PPL Foundation donated $500,000 to Operation HELP to assist customers impacted by COVID-19.
Other Assistance Initiatives:

Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

PPL Electric’s Response:

See PPL Electric’s response to the first question regarding the Company’s plans to engage in customer outreach prior to resuming terminations.
Other Assistance Initiatives:

Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor’s Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

PPL Electric’s Response:

See PPL Electric’s response to the first question regarding the Company’s plans to engage in customer outreach prior to resuming terminations.
Other Assistance Initiatives: Consumer Education and Outreach

Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

PPL Electric Response:

See Attachment 1 – COVID-19 Customer Communications.
Other Assistance Initiatives: Consumer Education and Outreach

Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

PPL Electric’s Response:

See Attachment 1 - COVID-19 Customer Communications. PPL Electric has used a variety of communication methods to reach a broad audience of its customers.
Other Assistance Initiatives: Consumer Education and Outreach

Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

PPL Electric’s Response:

PPL Electric has been cooperative in its formal proceedings before the Commission to accommodate the needs of the other parties. Some examples of this are PPL Electric agreeing to participate in telephonic and video conference hearings, accepting electronic service of filings, and where appropriate agreeing to extensions of schedules and postponements of hearings.
Other Assistance Initiatives: Consumer Education and Outreach

Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

PPL Electric’s Response:

The Lifeline Program for Telephone and Broadband Internet Service is not applicable to PPL Electric.
COVID-19
Customer Communications
## March 2020 – Customer Outreach

<table>
<thead>
<tr>
<th>Date</th>
<th>Tactic</th>
<th>Audience</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/16</td>
<td>Email</td>
<td>All customers</td>
<td>Preparations, social distancing, moratorium on service cuts</td>
</tr>
<tr>
<td>3/16</td>
<td>News release</td>
<td>Media</td>
<td>Preparations, social distancing, moratorium on service cuts</td>
</tr>
</tbody>
</table>
| 3/16   | Website – home page marquee and dedicated web pages | All customers | Links to COVID-related updates, including assistance programs, social distancing and safety info, energy efficiency tips, scam alerts, resources for businesses (from PA, chambers, etc.). Web pages remain live and are being updated regularly.  
  - pplelectric.com/coronavirus  
  - pplelectric.com/coronavirus-business |
| 3/19   | News release   | Media             | Moratorium on late fees                                                 |
| 3/26   | Email          | Residential customers | Looking out for our customers: assistance programs, moratorium on service cuts, scam alerts |
| 3/26   | Email          | Business customers | Resources for businesses, moratorium on service cuts, scam alerts         |
| 3/26   | News release   | Media             | Looking out for our customers: assistance programs                       |
| All    | Social Media   | All customers     | Organic social posts (27 total posts) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc.  
  - Facebook (9)  
  - Twitter (10)  
  - Linkedin (2)  
  - IG (6)        |
PPL Electric Utilities

March 20 – 2020

We’re facing this public health challenge together. We will not cut off service to any customer for unpaid bills until further notice, and we will reconnect service for any customers who were disconnected recently. #COVID19

Read More

PPL Electric Utilities

Mar 20

The PPL Foundation has contributed $500,000 to our Operation HELP program to support customers dealing with temporary financial hardship. #pplcares #COVID19

Read More

PPL Electric Utilities

Mar 19

PPL Electric Utilities waving late bill fees during COVID-19 pandemic

Measure provides additional help during health crisis

ALLENTOWN, Pa. (Mar 19, 2020) – PPL Electric Utilities announced Thursday (3/19) it is waiving late bill fees for all customers until further notice in order to provide more financial support during the coronavirus pandemic.

Consistent with last week’s order from the state’s Public Utility Commission for utilities statewide, PPLs already suspended service shutoffs for non-payment until further notice and reconnected customers who were recently disconnected. Late fees were waved effective March 16, 2020 and any late fees charged since then will be refunded.

“These are unprecedented times,” said Lori Mueller, PPLs vice president of

News Releases

PPL Electric Utilities waving late bill fees during COVID-19 pandemic

Measure provides additional help during health crisis

ALLENTOWN, Pa. (Mar 19, 2020) – PPL Electric Utilities announced Thursday (3/19) it is waiving late bill fees for all customers until further notice in order to provide more financial support during the coronavirus pandemic.

Consistent with last week’s order from the state’s Public Utility Commission for utilities statewide, PPLs already suspended service shutoffs for non-payment until further notice and reconnected customers who were recently disconnected. Late fees were waved effective March 16, 2020 and any late fees charged since then will be refunded.

“These are unprecedented times,” said Lori Mueller, PPLs vice president of
<table>
<thead>
<tr>
<th>Date</th>
<th>Tactic</th>
<th>Audience</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/1</td>
<td>Bill insert</td>
<td>Residential customers</td>
<td>Assistance programs: OnTrack, Operation HELP, payment assistance - inserted throughout April</td>
</tr>
<tr>
<td>4/1</td>
<td>Bill insert</td>
<td>Business customers</td>
<td>Resources for businesses, moratorium on service cuts, scam alerts - inserted throughout April</td>
</tr>
<tr>
<td>4/14</td>
<td>Blog</td>
<td>All customers</td>
<td>We’re standing with our customers through the pandemic: safety, payment assistance, moratorium on service cuts and late fees</td>
</tr>
<tr>
<td>4/20</td>
<td>Video</td>
<td>Targeted customer groups</td>
<td>Energy Efficiency tips while spending more time at home (30- and 60-second spot) <a href="https://vimeo.com/408996169">https://vimeo.com/408996169</a></td>
</tr>
<tr>
<td>4/20</td>
<td>Paid digital</td>
<td>Targeted customer groups</td>
<td>Energy Efficiency tips while spending more time at home; YouTube, Hulu, streaming radio and Facebook; campaign in flight through 6/15</td>
</tr>
<tr>
<td>4/20</td>
<td>Broadcast</td>
<td>Targeted customer groups</td>
<td>Energy Efficiency tips while spending more time at home; cable and local television ad buy; campaign in flight through 6/15</td>
</tr>
<tr>
<td>4/20</td>
<td>Website landing page</td>
<td>All customers</td>
<td>Savewithppl.com updated to include spot and blog post</td>
</tr>
<tr>
<td>4/21</td>
<td>Email</td>
<td>Business customers</td>
<td>We’re standing with our customers through the pandemic: safety, moratorium on service cuts and late fees</td>
</tr>
<tr>
<td>4/25</td>
<td>Email</td>
<td>All customers</td>
<td>Check your electric supply rate and shop for the best deal</td>
</tr>
</tbody>
</table>
| All   | Social Media      | All customers       | Organic social posts (56 total posts) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc.  
  • Facebook (21)  
  • Twitter (17)  
  • Linkedin (8)  
  • IG (10)  

**ATTACHMENT 1**

April 2020 – Customer Outreach
ATTACHMENT 1

April 2020 – Customer Outreach Examples

---

**PPL Stories**

**WE'RE STANDING WITH OUR CUSTOMERS THROUGH THIS PANDEMIC**

April 16, 2020

There are tougher times. We're standing with our customers through this pandemic and we're standing with our employees and our community.

We want to be there for you. We want to be a friend. We want to be there to help you through these uncertain times.

**PPL Electric Utilities**

**WE'RE ALL IN THIS TOGETHER**

PPL Electric Utilities offers several assistance programs to help you pay your electric bill.

- **Payment Assistance**
  - Set up a payment arrangement that works for you.
  - **Budget Billing**
  - Smooth out your payments so they're consistent and predictable.

**Neighbor Helping Neighbor**

Support those who are facing financial challenges in your community.

- **Apply today**

**Learn More**

**PPL Stories**

**WE WANT TO HELP YOU SAVE, ESPECIALLY DURING THESE TOUGH TIMES**

These are tough, and it's important to do everything we can to help.

- **We know that saving is tough. We know that paying your electric bill is tough.**

**Visit PPL.com/lookup**

**My Account**

**Customer Help**

**PPL Stories**

**100 Years of Innovation**

**Ways to help you save**

- **Learn More**

---

**PPL Electric Utilities**

**April 20**

**Save on electricity supply**

**100 Years of Innovation**

**Ways to help you save**

- **Learn More**

---

Visit PPL.com/lookup for everything you need to know about PPL’s Energy Efficiency Programs. Learn more at ElectricUtility.com. Stay healthy and stay safe!
<table>
<thead>
<tr>
<th>Date</th>
<th>Tactic</th>
<th>Audience</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/6</td>
<td>Email</td>
<td>Residential customers eligible for income assistance programs</td>
<td>Bill help: payment assistance programs, energy efficiency tips</td>
</tr>
<tr>
<td>5/6</td>
<td>Email</td>
<td>Small business customers</td>
<td>Small business week; resources for businesses (from PA, chambers, etc.)</td>
</tr>
<tr>
<td>5/8</td>
<td>Blog</td>
<td>All customers</td>
<td>Energy Efficiency tips for spending more time at home</td>
</tr>
<tr>
<td>5/8</td>
<td>Website marquee</td>
<td>All customers</td>
<td>Energy Efficiency tips</td>
</tr>
<tr>
<td>5/11</td>
<td>Email</td>
<td>Customers whose energy use increased in the previous month</td>
<td>Energy Efficiency tips for spending at home - drive to savewithppl.com</td>
</tr>
<tr>
<td>5/11</td>
<td>Outbound call</td>
<td>Customers whose energy use increased in the previous month</td>
<td>Energy Efficiency tips for spending at home – drive to savewithppl.com</td>
</tr>
<tr>
<td>5/21</td>
<td>Email</td>
<td>Residential customers eligible for LIHEAP</td>
<td>Notice that LIHEAP has reopened</td>
</tr>
<tr>
<td>5/21</td>
<td>Webinar</td>
<td>Small business customers</td>
<td>Live webinar with tips to manage bills; three webinars held throughout May and June</td>
</tr>
<tr>
<td>5/21</td>
<td>Outbound call</td>
<td>Residential customers who had received LIHEAP grant in 2020</td>
<td>Notice that LIHEAP has reopened; notification of consent needed to apply for additional funds</td>
</tr>
<tr>
<td>6/1</td>
<td>Bill insert</td>
<td>All customers</td>
<td>Special edition of Connect newsletter with Bill Help focus: assistance programs, energy efficiency tips, shopping tips, other resources – inserted throughout June</td>
</tr>
<tr>
<td>All</td>
<td>Social Media</td>
<td>All customers</td>
<td>Organic social posts (38 total posts) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc.</td>
</tr>
</tbody>
</table>

- Facebook (15)
- Twitter (11)
- Linkedin (7)
- IG (5)
PPL Electric Utilities

LIHEAP has re-opened with additional funding to help customers through #COVID19. Apply today. http://ow.ly/SRtq50zMPvF

May 15

PPL Electric @PPLElectric

Need help paying your electric bill? Complete a quick and easy application at pplelectric.com/sstrack and see if your family qualifies for these great benefits:
1. Lower monthly payments
2. Debt forgiveness
3. Energy savings

You may qualify for a grant to help pay your energy bills

We have great news to help you pay your electric bill during this unprecedented time. Due to the coronavirus pandemic, LIHEAP, the federal program that provides grants to help you pay energy bills has re-opened through August 2020 or until additional funding is exhausted.

Please act fast! You may be eligible for up to $800 in utility dollars to help with your current account balance. Unlike previous years, you do not need a shut-off notice to apply since we’ve suspended all orders to cut off service for unpaid bills. All you need is your most recent electric bill. See if you qualify and apply for free money toward your bill.

Apply now

Don’t forget that we also offer a variety of assistance programs to help customers at every income level. Whether your family would benefit from budget billing, a payment agreement or a due date change, we can help.

Learn more