

17 North Second Street 12th Floor Harrisburg, PA 17101-1601 215-587-1000 Main 717-731-1985 Main Fax www.postschell.com

Devin Ryan

dryan@postschell.com 717-612-6052 Direct 717-731-1985 Direct Fax File #: 169836

December 9, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor North P.O. Box 3265 Harrisburg, PA 17105-3265

Re: PPL Electric Utilities Corporation Universal Service and Energy Conservation Plan for 2017-2019 Submitted in Compliance with 52 Pa. Code § 54.74

Docket No. M-2016-2554787

Dear Secretary Chiavetta:

PPL Electric Utilities Corporation ("PPL Electric" or the "Company") respectfully submits this letter requesting that the temporary amendment to the Company's Universal Service and Energy Conservation Plan ("USECP"), which has allowed an increased number of customers who can qualify for assistance under the Operation HELP program, be extended from the end of 2020 to the end of the current USECP. As explained in the USECP, Operation HELP is a hardship fund supported by donations from PPL Corporation, its employees, retirees, and customers. The program targets low-income customers who have overdue balances and an inability to pay the full amount of their energy bills. The primary features of Operation HELP include: (1) direct financial assistance for overdue energy bills; (2) protection against shutoffs; and (3) referrals to other programs and services.

Due to the emergency situation involving the COVID-19 outbreak, PPL Electric previously filed a letter on March 27, 2020, requesting a temporary amendment to its USECP, which would expand the number of customers who can qualify for assistance under Operation HELP through the end of 2020. Specifically, PPL Electric proposed to temporarily change the definition of "low-income" under its Operation HELP program from annual incomes at or below 200 percent of the federal poverty level ("FPL") to annual incomes at or below 250 percent of the FPL. Such change to the definition would remain effective through the end of 2020. Consistent with the Company's current

Rosemary Chiavetta December 9, 2020 Page 2

practices, OnTrack ("CAP") customers would remain eligible to receive Operation HELP hardship assistance. The Pennsylvania Public Utility Commission ("Commission") approved the temporary amendment to the USECP by Secretarial Letter dated March 30, 2020.

The Company's amendment to Operation HELP's definition of "low-income" has been successful. As of November 30, 2020, PPL Electric has issued \$1,155,896 in grants to 2,167 customers. Approximately 12% of the grant recipients were between 200% - 250% of the FPL and, without the amendment, would have been ineligible to participate in Operation HELP and receive those grants and other benefits of the program.

As the end of 2020 approaches, the COVID-19 pandemic continues to rage across the Commonwealth, with many public health officials warning of the danger that the pandemic presents during the upcoming winter months. Consequently, the financial constraints faced by many of PPL Electric's customers continue to exist today and likely will exist well into 2021.

Accordingly, through this letter, PPL Electric respectfully requests that the Commission extend its approval of the temporary amendment to the Company's USECP from the end of 2020 to the end of the current USECP. This request would enable more customers to receive the benefits of participating in Operation HELP and help relieve their financial constraints. Moreover, the Company's request can be accommodated under Operation HELP's budget, with \$919,793 of the budget remaining as of November 30, 2020, and projected donations of approximately \$1.2 million in 2021.

Prior to filing this letter, PPL Electric consulted with the Office of Consumer Advocate ("OCA") and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") about the instant proposal. The Company is authorized to represent that OCA and CAUSE-PA do not oppose its request to extend the amendment of Operation HELP's definition of "low-income" through the end of the current USECP.

Copies of this letter are being provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl Enclosure

cc: Certificate of Service Joseph Magee Alexis Bechtel

Louise Fink Smith

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has 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 E-MAIL ONLY

Elizabeth R. Marx, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net emarxpulp@palegalaid.net Counsel for CAUSE-PA Christy M. Appleby Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 cappleby@paoca.org Counsel for OCA

Date: December 9, 2020

Devin T. Ryan