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File #: 195423

October 17, 2022

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

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) is an **EXPEDITED** Petition to Modify its Universal Service and Energy Conservation Plan (“USECP”), so that the Company’s Customer Assistance Program (“CAP”) Plus charge stays at its current amount of \$7.00 rather than increasing to approximately \$14.00 effective November 1, 2022.

As explained in the Petition, the CAP Plus charge is recalculated annually effective November 1 of each year based on the total amount of Low Income Home Energy Assistance Program (“LIHEAP”) grants received by OnTrack customers over the past year. The total amount of LIHEAP grants increased substantially over the past year due to a large increase in federal funding. Specifically, the current CAP Plus charge is \$7.00 based on \$5.8 million in LIHEAP grants for OnTrack recipients in the 2020/2021 season, whereas the CAP Plus charge would increase to approximately \$14.00 effective November 1, 2022, based on \$11.2 million in LIHEAP grants for OnTrack recipients in the 2021/2022 season. Without the requested relief, PPL Electric’s CAP Plus charge for low-income customers enrolled in OnTrack will nearly double beginning November 1, 2022.

PPL Electric also respectfully requests that the Commission shorten the answer period for this Petition from 10 days to five days and issue an **EXPEDITED** Order granting the Petition, so that the Company has sufficient time to implement the change before November 1, 2022.

Rosemary Chiavetta
October 17, 2022
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Copies of this filing are being served as indicated on the enclosed Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

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 § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

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A handwritten signature in blue ink, appearing to read 'Devin T. Ryan', written over a horizontal line.

Devin T. Ryan

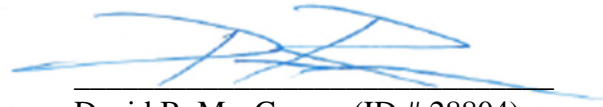
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2554787
2017-2019 Submitted in Compliance with 52 :
Pa. Code § 54.74 :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.572(e), ANSWERS TO PETITIONS FOR AMENDMENT OF PENNSYLVANIA PUBLIC UTILITY COMMISSION ORDERS GENERALLY ARE DUE WITHIN TEN (10) DAYS AFTER THE DATE OF SERVICE. **IN THE INSTANT PETITION, THE COMPANY REQUESTS AN EXPEDITED RESPONSE PERIOD OF FIVE (5) DAYS SO THAT THE PENNSYLVANIA PUBLIC UTILITY COMMISSION CAN RULE ON PPL ELECTRIC UTILITIES CORPORATION'S PROPOSAL TO MODIFY ITS UNIVERSAL SERVICE AND ENERGY CONSERVATION PLAN AND KEEP THE CAP PLUS CHARGE ITS CURRENT AMOUNT, AS REQUESTED IN THS PETITION, BEFORE THE CHARGE IS SET TO INCREASE ON NOVEMBER 1, 2022.** YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: October 17, 2022

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2554787
2017-2019 Submitted in Compliance with 52 :
Pa. Code § 54.74 :

**EXPEDITED PETITION OF PPL ELECTRIC UTILITIES CORPORATION TO
MODIFY ITS UNIVERSAL SERVICE AND ENERGY CONSERVATION PLAN**

Pursuant to Sections 5.41 and 5.572 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 5.41, 5.572, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Petition seeking an **expedited** order to modify the Company’s current Universal Service and Energy Conservation Plan (“USECP”), such that the Company’s Customer Assistance Program (“CAP”)¹ Plus charge stays at its current amount of \$7.00 rather than increasing it to approximately \$14.00² effective November 1, 2022. Under the current USECP, the CAP Plus charge is recalculated annually effective November 1 of each year based on the total amount of Low Income Home Energy Assistance Program (“LIHEAP”) grants received by OnTrack customers over the past year. The total amount of LIHEAP grants increased substantially over the past year due to a large increase in federal funding. Specifically, the current CAP Plus charge is \$7.00 based on \$5.8 million in LIHEAP grants for OnTrack recipients in the 2020/2021 season, whereas the CAP Plus charge would increase to approximately \$14.00 effective November 1, 2022, based on \$11.2 million in LIHEAP grants for OnTrack recipients in the 2021/2022 season.

¹ PPL Electric’s CAP is referred to as OnTrack in its USECP.

² The exact amount is \$13.74.

The approximately \$14.00 charge would be almost double the current charge of \$7.00 and would be \$6.00 more than the highest CAP Plus charge amount in the charge's history. And, in the Company's ongoing USECP 2023-2027 proceeding, PPL Electric has agreed with proposals by the Office of Consumer Advocate ("OCA") and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") to eliminate the CAP Plus charge effective upon plan approval which is anticipated to occur in early 2023. Assuming the Commission agrees with those proposals, PPL Electric does not believe it is practical to increase the CAP Plus charge substantially for a short duration, only to eliminate the charge with the commencement of the Company's next USECP.

Prior to filing the instant Petition, PPL Electric consulted with the OCA, CAUSE-PA, and the Commission's Bureau of Consumer Services ("BCS"). The Company is authorized to represent that none of those parties oppose the expedited relief requested in this Petition.

For these reasons and as set forth in more detail herein, PPL Electric respectfully requests that the Commission issue an expedited order to modify the Company's current USECP, so that the CAP Plus charge remains at its current level of \$7.00 until the USECP 2023-2027 is approved and goes into effect.

I. INTRODUCTION

1. PPL Electric is a "public utility" and an "electric distribution company" ("EDC") as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric's attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Petition.

II. FACTUAL BACKGROUND

3. PPL Electric's current USECP became effective on January 1, 2017, is set to expire upon the effective date of the Company's proposed 2023-2027 USECP.

4. Under the current USECP, PPL Electric charges OnTrack customers a CAP Plus amount, which stems from the Company's 2010 base rate case settlement at Docket No. R-2010-2161694.

5. As described in the USECP, "The purpose of CAP Plus is to help offset program expenses for all residential customers who pay for OnTrack through the reconcilable Universal Service Rider." (USECP, p. 7.)

6. “The Company determines the CAP Plus amount by taking the total amount of LIHEAP funding received by OnTrack participants, dividing that dollar amount by the number of active OnTrack accounts as of September 30, and then dividing that annual amount by 12 months.” (USECP, p. 7.)

7. The CAP Plus payment amount is applicable to all OnTrack participants and may change annually . . . depending on the level of federal funding available for LIHEAP.” (USECP, p. 7.)

8. The CAP Plus charge, therefore, adjusts annually effective November 1 based on the LIHEAP grants received by OnTrack customers over the past 12 months as of September 30.

9. The following table shows the history of the CAP Plus charge amounts since it was first charged beginning in November 2011:

Time Period	CAP Plus Charge Amount
November 2011 to October 2012	\$8.00
November 2012 to October 2013	\$5.00
November 2013 to October 2014	\$2.50
November 2014 to October 2015	\$4.00
November 2015 to October 2016	\$3.00
November 2016 to October 2017	\$3.83
November 2017 to October 2018	\$4.04
November 2018 to October 2019	\$3.47
November 2019 to October 2020	\$4.00
November 2020 to October 2021	\$5.00

November 2021 to October 2022	\$7.00
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10. Over the past 12 months as of September 30, 2022, OnTrack customers received a significant increase in LIHEAP grants, going from \$5.8 million in the 2020/2021 season to \$11.2 million in the 2021/2022 season.

11. Based on the \$11.2 million in LIHEAP grants, PPL Electric’s CAP Plus charge is set to nearly double from \$7.00 to approximately \$14.00 effective November 1, 2022.

12. In the Company’s pending 2023-2027 USECP proceeding at Docket No. M-2022-3031727, the OCA and CAUSE-PA have proposed eliminating the CAP Plus charge. (*See* OCA Comments, p. 13 (“[T]he OCA would support elimination of the CAP Plus amount”); CAUSE-PA Comments, p. 13 (“CAUSE-PA strongly opposes the imposition of CAP Plus payments in any form, and requests that the Commission require PPL to eliminate this payment requirement from its Proposed 2023 USECP.”).)

13. PPL Electric stated in its Reply Comments that it would be willing to eliminate the CAP Plus charge, subject to the Commission’s approval. (*See* PPL Comments, p. 6.)

III. LEGAL STANDARDS

14. Section 5.41 of the Commission’s regulations states, in pertinent part, that “[p]etitions for relief under the act or other statute that the Commission administers, must be in writing, state clearly and concisely the interest of the petitioner in the subject matter, the facts and law relied upon, and the relief sought.” 52 Pa. Code § 5.41(a).

15. Copies of any petition under Section 5.41 must be served on the statutory parties and “on all persons directly affected and on other parties whom petitioner believes will be affected by the petition,” as well as further directed by the Commission. 52 Pa. Code § 5.41(b)-(c).

16. Section 5.572 of the Commission’s regulations states that petitions for rescission or amendment of Commission orders “must be in writing and specify, in numbered paragraphs, the findings or orders involved, and the points relied upon by the petitioner, with appropriate record references and specific requests for the findings or orders desired.” 52 Pa. Code § 5.572(a).

17. A petition for rescission or amendment “may be filed at any time according to the requirements of section 703(g)” of the Public Utility Code, and answers to such petition are due within 10 days after the date of service. 52 Pa. Code § 5.572(d)-(e).

IV. REQUEST FOR EXPEDITED MODIFICATION OF PPL ELECTRIC’S USECP

18. PPL Electric respectfully requests that the Commission modify the Commission-approved USECP in order to maintain the CAP Plus charge at its current amount of \$7.00 until the start of the Company’s 2023-2027 USECP, which is anticipated to become effective January 1, 2023.

19. Furthermore, expedited action by the Commission is necessary, so that PPL Electric can implement the proposed modification in sufficient time before the CAP Plus charge increases to approximately \$14.00 on November 1, 2022.

20. As demonstrated in the following sections, the Company’s proposal is reasonable and in the public interest and, therefore, should be approved.

A. THE COMPANY’S PROPOSAL TO MAINTAIN THE CAP PLUS CHARGE AT ITS CURRENT AMOUNT IS REASONABLE AND IN THE PUBLIC INTEREST

21. The Commission should approve the Company’s proposal to maintain the CAP Plus charge at its current amount of \$7.00 until PPL Electric’s 2023-2027 USECP is approved and becomes effective.

22. As noted previously, the approximately \$14.00 charge would be almost double the current charge of \$7.00 and would be \$6.00 more than the highest CAP Plus charge amount in the charge's history.

23. Additionally, in the Company's ongoing USECP 2023-2027 proceeding, PPL Electric has agreed with proposals by the OCA and CAUSE-PA to eliminate the CAP Plus charge effective upon the USEPC's approval, which is anticipated to occur in early 2023.

24. If the Commission ultimately agrees with those proposals, the Company does not believe it is practical to increase the CAP Plus charge substantially for a short duration, only to eliminate the charge with the commencement of the Company's next USECP.

25. Furthermore, PPL Electric's requested relief is narrowly tailored to address this specific situation. The Company is requesting that the CAP Plus charge remain at its current rate of \$7.00 until such time as its proposed 2023-2027 USECP is approved and goes into effect.

B. EXPEDITED ACTION BY THE COMMISSION IS NECESSARY

26. Commission action is needed before its next public meeting on October 27, 2022.

27. To keep the CAP Plus charge its current amount, PPL Electric must complete necessary Information Technology ("IT") work to implement that change and ensure that OnTrack customers are billed the \$7.00 CAP Plus charge, not the approximately \$14.00 CAP Plus charge, effective November 1, 2022.

28. Therefore, unless the Commission grants this Petition in sufficient time before November 1, 2022, PPL Electric's CAP Plus charge amount will nearly double from \$7.00 to approximately \$14.00 and will be \$6.00 more than the charge's highest amount since its inception.

29. As such, and as noted on the Petition's Notice to Plead, PPL Electric respectfully requests that the answer period for this Petition be shortened from 10 days³ to five days, thereby making any answers due by Monday, October 24, 2022.

30. Further, to the extent possible, PPL Electric respectfully requests that the Commission act on this Petition before its next scheduled public meeting on October 27, 2022, by Secretarial Letter, so that PPL Electric can complete the required IT work to implement the proposed change before the CAP Plus charge increases on November 1, 2022.

31. Such requests are warranted under the current circumstances.

32. Indeed, as noted previously, PPL Electric's CAP Plus charge is recalculated based on the total amount of LIHEAP funding received by OnTrack participants for the past 12 months as of September 30.

33. The data for 2021/2022 season only became available to PPL Electric recently and showed that the CAP Plus charge would increase from \$7.00 to approximately \$14.00.

34. Since that time, the Company worked expeditiously to prepare and file the Petition.

35. Also, to help expedite the Commission's consideration of this Petition, PPL Electric consulted with the OCA, CAUSE-PA, and BCS prior to filing.

36. The Company is authorized to represent that none of those parties oppose the Company's requested relief.

³ See 52 Pa. Code § 5.572(e).

V. SERVICE OF THE PETITION

37. Under Section 5.41(b) of the Commission’s regulations, a copy of a petition “shall be served on all persons directly affected and on other parties whom petitioner believes will be affected by the petition.” 52 Pa. Code § 5.41(b).

38. Further, copies of a petition “shall be served upon the Office of Trial Staff, the Office of Consumer Advocate and the Office of Small Business Advocate, and such “[s]ervice shall be evidenced with a certificate of service filed with the petition.” *Id.*

39. Under Section 5.572(b), a petition for amendment of a Commission order “shall be served upon each party to the proceeding.” 52 Pa. Code § 5.572(b).

40. As indicated on the enclosed Certificate of Service, copies of this Petition are being served on the parties to PPL Electric’s current 2017-2022 USECP proceeding (Docket No. M-2016-2554787), the Company’s pending 2023-2027 USECP proceeding (Docket No. M-2022-3031727), and the statutory parties.

VI. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission issue an **expedited** order approving the requested modification of the Company's current USECP, such that the Company has sufficient time to incorporate the proposed modification before the CAP Plus charge increases on November 1, 2022.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: October 17, 2022

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, YVETTE BELFORT, being the Manager – Regulatory Programs/Business Services at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 10/14/2022

Yvette Belfort
Yvette Belfort (Oct 14, 2022 13:22 EDT)

Yvette Belfort