


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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October 21, 2022

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

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

PPL Electric Utilities Corporation Universal
Service and Energy Conservation Plan for
2023-2027
Docket No. M-2022-3031727

Petition of PPL Electric Utilities Corporation
for Expedited Approval to Modify the CAP Plus
Charge in its 2017 Universal Service and Energy
Conservation Plan
Docket No. P-2022-3036146

Dear Secretary Chiavetta:

On October 17, 2022, PPL Electric Utilities Corporation (PPL or Company) filed a request for expedited treatment of the Company's Petition to Modify its Universal Service and Energy Conservation Plan (USECP) (Petition). In the Petition, PPL requested that the Company's current Customer Assistance Program (CAP) Plus charge remain at \$7.00 rather than increasing to approximately \$14.00 effective November 1, 2022. Petition at ¶ 11. As PPL correctly states in its Petition, the Company consulted with the Office of Consumer Advocate (OCA) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) prior to filing this Petition. Petition at ¶ 11. As PPL also correctly identified in its Petition, the OCA supports maintaining the current CAP Plus charge of \$7 pending a determination in the on-going, pending 2023-2027 USECP proceeding at Docket No. M-2022-3031727. Petition at ¶ 12. On October 18, 2022, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) also filed a Letter in Lieu of Answer in support of maintaining the current \$7 CAP Plus charge pending a more complete review in PPL's 2023-2027 USECP proceeding.

¹ On October 21, 2022, the Commission issued a Secretarial Letter granting the request for expedited treatment and providing that Answers to the Petition should be filed within five (5) days, or by October 24, 2022.

As the Company discussed in its Petition, the CAP Plus charge is recalculated annually effective November 1. Petition at ¶ 8. PPL calculates 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.” Petition at ¶ 6. The total amount of LIHEAP grants increased substantially over the past year due to a significant increase in federal funding available in last year’s LIHEAP season. Petition at ¶ 10. In its Petition, PPL states that the current \$7.00 CAP Plus charge is based upon \$5.8 million in LIHEAP grants received by CAP participants in the 2020-2021 LIHEAP season, and the CAP Plus charge would increase to approximately \$14.00 based upon approximately \$11.2 million in LIHEAP grants received for the 2021-2022 LIHEAP season. Petition at ¶10.

The OCA supports maintaining the existing \$7 CAP Plus charge pending resolution in the 2023-2027 USECP proceeding, In the 2023-2027 USECP proceeding, the OCA and CAUSE-PA have both proposed to eliminate the current CAP Plus, and in Reply Comments, PPL adopted the Proposal. The matter is pending before the Public Utility Commission. In the 2023-2027 USECP, the Commission will have the opportunity to fully review whether the CAP Plus should be eliminated. In the interim, the OCA does not support dramatically increasing the CAP Plus charge by \$7.00 during the potentially short two month gap between the effectiveness of the current Plan and the pending 2023-2027 Plan.

Copies have been served as indicated on the enclosed Certificate of Service.

If you have any questions, please contact me at (717) 599-8954.

Respectfully submitted,

/s/ Christy M. Appleby
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Certificate of Service

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CERTIFICATE OF SERVICE

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 :

PPL Electric Utilities Corporation's :
Proposed Universal Service and Energy : Docket No. M-2022-3031727
Conservation Plan for 2023-2027 :

Petition of PPL Electric Utilities Corporation:
for Expedited Approval to Modify the CAP : Docket No. P-2022-3036146
Plus Charge in its 2017 Universal Service :
and Energy Conservation Plan :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Letter Re: In Lieu of An Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of October 2022.

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