



COMMUNITY LEGAL SERVICES  
OF PHILADELPHIA

June 3, 2011

Re: Investigation of Pennsylvania's Retail Electricity Market  
Docket No. I-2011-2237952

Dear Chairman Powelson, Vice Chairman Coleman, and members of the Commission:

Community Legal Services, Inc. ("CLS") is a not for profit law firm that provides free legal services to low income residents of Philadelphia, including many with utility problems. We appreciate the opportunity to comment on the Public Utility Commission's Investigation of Pennsylvania's Retail Electric Market. Each year, the CLS Energy Unit handles more than 500 requests for legal assistance with utility matters. Most of these cases involve the regulated utilities of PECO Energy and Philadelphia Gas Works that serve Philadelphia residents. Against this background, we provide these Comments for the Commission's consideration.

CLS fully supports the Comments of the Pennsylvania Utility Law Project ("PULP") and incorporates them herein by reference. CLS highlights, in particular, the important role that the Electric Distribution Companies ("EDCs") have played in the growth of the Universal Service and Energy Conservation programs throughout the Commonwealth. PECO Energy, serving Philadelphia residents, has been a leader in significant advances in Customer Assistance Program enrollment and Low Income Usage Reduction Program expansion. It is the local distribution companies that have a significant history of direct interaction with the Pennsylvania Department of Welfare ("DPW") and have obtained LIHEAP vendor status and developed the electronic exchange systems with DPW for expedited notice and receipts of LIHEAP. The EDCs have a long history of undertaking these responsibilities and programs that would be under serious risk of disruption if default service provider status were to change.

CLS supports the existing distribution company default status and would caution the Commission not to undertake changes to a system upon which consumers, especially low income consumers, heavily rely.

Respectfully submitted,

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