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File #:

September 28, 2012

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

**RE: Petition of PPL Electric Utilities Corporation for a Permanent Waiver of 52 Pa. Code § 56.97(a) to Allow Customers to Establish Payment Agreements Online or through an Automated Interactive Voice Response System.
P-2012-**

Dear Secretary Chiavetta:

Enclosed for filing please find the above-referenced Petition of PPL Electric Utilities Corporation. Copies will be provided as indicated on the certificate of service.

Respectfully submitted,

Christopher T. Wright

CTW/

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 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Tanya J. McCloskey
Office of Consumer Advocate
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Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101-1414

Date: September 28, 2012



Christopher J. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for a Permanent Waiver of 52 :
Pa. Code § 56.97(a) to Allow Customers to : Docket No. P-2012-_____
Establish Payment Agreements Online or :
through an Automated Interactive Voice :
Response System. :

PETITION OF PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.43, and respectfully requests a permanent waiver of 52 Pa. Code § 56.97(a) to allow customers the option, in defined circumstances, to establish payment agreements either online or through an automated system to avoid termination of service. PPL Electric previously received a two-year waiver of 52 Pa. Code § 56.97(a) from the Commission for a pilot to expand the Company’s Website and Interactive Voice Response (“IVR”) capabilities to provide customers with the option to establish payment agreements. Given the success of the pilot Website and IVR system, PPL Electric herein seeks Commission approval to offer these Website and IVR capabilities on a permanent basis. In support thereof, PPL Electric states as follows:

I. INTRODUCTION

1. This Petition is filed by PPL Electric, a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric's address is Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

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

4. PPL Electric, like other regulated utilities in Pennsylvania, has provided customers with a variety of payment options, including making payments through online or automated systems, such as its Website and IVR systems.

5. On April 7, 2010, PPL Electric filed a petition at Docket No. P-2010-2168786, requesting a two-year waiver of 52 Pa. Code § 56.97(a) to allow the Company to expand its Website and IVR capabilities to provide customers, within certain limitations, the option of using the Website and IVR to set up payment agreements to avoid termination.¹ On September 24, 2010, the Commission entered an Order granting PPL Electric a two-year waiver and authorizing the Company to implement its proposal to expand the Website and IVR capabilities. *See Petition of PPL Electric Utilities Corporation for a Declaratory Order Regarding a Pilot to Expand Website and Interactive Voice Response Capabilities to Allow Customers the Option of Setting Up Payment Agreements or, in the Alternative, a Two-Year Waiver of 52 Pa. Code § 56.97(a), Docket No. P-2010-2168786 (Sept. 24, 2010) (hereinafter, "PPL IVR Pilot Petition")*.

6. The two-year pilot to expand the Website and IVR systems has provided helpful and timely options for customers to respond to service termination notices, while continuing to provide the ability to speak directly to a customer service representative. The pilot has been highly successful.

7. Given the success of its pilot to expand the Website and IVR systems, PPL Electric herein seeks Commission approval to offer customers the permanent option of using the Website and IVR system to establish payment agreements to avoid termination of service. For the reasons that follow, PPL Electric believes that its proposal to offer the expanded Website and IVR systems on a permanent basis is reasonable, effective, and in the public interest.

¹ Both the Office of Consumer Advocate ("OCA") and the Pennsylvania Public Utility Law Project ("PULP") filed answers to the petition expressing interest in and concerns about the proposed waiver for the self-serve payment agreement pilot. The Company conducted meetings and conference calls with OCA and PULP not only to explain the proposed pilot in more detail but to address their specific concerns and issues. PPL Electric was able to incorporate many of their suggestions into the processes associated with the two-year pilot program.

II. DISCUSSION

A. Legal Standards

8. Section 56.97(a) of the Commission's Regulations provides as follows:

(a) If, after the issuance of the initial termination notice and prior to the actual termination of service, a ratepayer or occupant contacts the utility concerning a proposed termination, an authorized utility employee shall fully explain:

- (1) The reasons for the proposed termination.
- (2) All available methods for avoiding a termination, including the following:
 - (i) Tendering payment in full or otherwise eliminating the grounds for termination.
 - (ii) Entering a settlement or payment agreement.
- (3) The medical emergency procedures.

52 Pa. Code § 56.97(a).

9. The Commission held that PPL Electric's pilot Website and IVR systems do not comply with the requirement of 52 Pa. Code § 56.97(a) that customers facing termination of service will be contacted by a utility employee. *See PPL IVR Pilot Petition*, Slip Op. at pp. 11-12. PPL Electric therefore seeks a waiver of 52 Pa. code § 56.97(a) to allow the Company to offer the expanded Website and IVR capabilities to customers on a permanent basis.

10. Section 5.43 of the Commission's Regulations permits a party to petition the Commission for a waiver of a regulation. The petition must provide the purpose and facts that constitute the grounds requiring waiver of the regulation. 52 Pa. Code § 5.43(a). Similarly, Section 56.222 of the Commission's Regulations permits a party to seek a modification from a provision of Chapter 56 of the Commission's regulations where, as here, "technological advance permits an enhanced level of customer service." 52 Pa. Code § 56.222.

11. The Commission has explained that it has the authority to waive its regulations when it is necessary and in the public interest. *Petition of Direct Energy Services, LLC for Emergency Order Approving a Retail Aggregation Bidding Program for Customers of Pike County Light & Power Company*, Docket No. P-00062205, 2006 Pa. PUC LEXIS 3, 249 P.U.R.4th 327 (April 20, 2006); *Petition of ALLTEL Pennsylvania, Inc. for Declaratory Order*, Docket Nos. P-00950955, *et al.* (June 10, 1996).

12. For the reasons explained below, PPL Electric believes that a permanent waiver of 52 Pa. Code § 56.97(a) will continue to provide helpful and timely options for customers who are confronted with the possibility of termination of service. Allowing customers to establish their own payment agreements provides convenience without negating other Chapter 56 consumer protections or eliminating the ability to speak with a Company customer service representative. The cost-benefit ratio for the self-serve payment agreement systems has been very favorable. Further, the success of the two-year pilot has clearly demonstrated the importance of offering self-serve options to customers.

13. For these reasons, as more fully explained below, PPL Electric believes that its proposal to offer the expanded Website and IVR systems on a permanent basis is reasonable, effective, and in the public interest.

B. Background and Overview of PPL Electric's Expanded Website and IVR Systems.

14. To accommodate customers' needs to communicate with PPL Electric in a timely manner, PPL Electric offers a variety of communication avenues, such as telephone, e-mail, fax, Website, IVR, and written correspondence.

15. Historically, the telephone was the primary means through which customers contacted PPL Electric to address their inquiries and concerns. However, with the advent of the

Internet, the communications profile for PPL Electric’s customers has dramatically changed. For example, in 2011 PPL Electric’s Customer Contact Center processed 6.5 million customer contacts through its telephone, Website, and IVR systems.² Of this total, 60.6% (3.9 million) were self-serve transactions -- Website (2,239,682) and IVR (1,700,296). The following table below illustrates that these “self-service” transactions for PPL Electric have more than doubled since 2008.

Year	Web Transactions	IVR Transactions	Total Web and IVR Transactions
2011	2,239,682	1,700,296	3,939,978
2010	1,649,056	992,871	2,641,927
2009	1,330,030	764,591	2,094,621
2008	1,203,092	790,346	1,993,438

This upward trend is continuing in 2012. When comparing self-service transactions (Website and IVR) for January 1 through July 31, the number of transactions has increased by 13.5% -- from 1,877,173 in 2011 to 2,130,184 in 2012.

16. On April 7, 2010, PPL Electric filed a petition at Docket No. P-2010-2168786, requesting a two-year waiver of 52 Pa. Code § 56.97(a) to allow the Company to expand its Website and IVR capabilities to provide customers, within certain limitations, the option of using the Website and IVR to set up payment agreements to avoid termination. On September 24, 2010, the Commission entered an Order granting PPL Electric’s pilot Website and IVR systems a two-year waiver, with certain conditions. The Commission concluded that the pilot is an innovative and creative solution to improve customer service, and that implementation of the pilot will be in the public interest. *See PPL IVR Pilot Petition*, at 12.³

² This total includes inbound calls handled, Website transactions completed, and successful IVR contacts.

³ In its Order, the Commission directed PPL Electric to: (1) work with the Bureau of Consumer Services when developing the scripts to be used in the Interactive Voice Response system and text to be used for the Website; (2) track and report the costs associated with the implementation of the proposed program; (3) file quarterly statistical

17. Under the pilot Website and IVR, after receiving an initial termination notice customers have the option, within certain limitations discussed below, to set up payment agreements to avoid termination of service by accessing the Website or IVR systems at the customer's convenience.

18. Customers are informed about the reasons for termination through receipt of the 10-day termination notice. Under the pilot Website and IVR, customers are automatically advised of all available methods for avoiding termination of service through links on the Website system and automated prompts on the IVR system. Further, PPL Electric has designed the expanded systems to provide either written (Website) or automated (IVR) reminders that customers may speak directly with a customer service representative.

19. Under the pilot Website and IVR, the initial welcome screen (Website) or prompt (IVR) provides information such as the balance, past due amount, and scheduled termination of service date. The next screen or prompt (Payment Assistance Options) provides several payment options, such as paying the reinstatement amount, reporting a payment, or establishing a payment agreement. There also are instructions on how to proceed with a payment agreement and details regarding the terms of the agreement and universal service programs, such as LIHEAP and CAP, if eligible.

20. Payment agreements established through the pilot Website and IVR use the same criteria followed by PPL Electric's customer service representatives, as set forth in 52 Pa. Code § 1405(b). For example, a customer with household income under 150 percent of the federal poverty level will have five years to pay off an overdue balance. The pilot Website and IVR will

reports detailing customer usage and inform the Commission of any problems that arise with the program; (4) prepare a comprehensive report at the end of the first year of the program's implementation. *See PPL IVR Pilot Petition*, at 15-16. PPL Electric fully complied with the Commission's Order, and each of the required reports are available at Docket No. P-2010-2168786.

request or update financial information to determine the agreement terms. Customers will be offered budget billing and, if appropriate based on their household income, referrals to universal service programs such as LIHEAP and CAP. As described in Paragraph 24, below, PPL Electric sends confirmations to customers after they have completed the transaction.

21. Under the pilot Website and IVR, PPL Electric does not require customers to complete payment agreement transactions that they do not understand. Once a customer starts to use the pilot Website or IVR systems to establish a payment agreement, customers may cancel out at any time if they do not understand the terms or do not have time to complete the transaction. If customers cancel out, the pilot systems provide a reminder that the termination of service will continue as scheduled, and that customers should call PPL Electric to discuss their concerns. The pilot systems also provide PPL Electric's toll-free telephone number and Call Center hours of operation. Further, if customers received a termination notice from PPL Electric, the notice also includes toll-free telephone numbers for both the Commission and PPL Electric.

22. After customers select the payment agreement option, the system presents those customers with the terms of their payment agreements. The system will ask customers if they are in agreement with the terms. If customers answer "no," the pilot Website presents a message that requests that customers call PPL Electric to discuss other options. The pilot IVR forwards customers to a customer service representative immediately if customers answer "no" to the proposed payment agreement terms.

23. Importantly, customers using the pilot Website or IVR systems to establish payment agreements always have the opportunity to speak directly with a customer service

representative between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. This process is identical for customers who choose to call PPL Electric directly.

24. For those customers who decide to use the pilot Website or IVR to establish a payment agreement, PPL Electric automatically sends those customers a follow-up e-mail for Website transactions or letter for IVR transactions. The purpose of these follow-up communications is to recap and confirm the completed transaction and explain the steps customers should take in the event they disagree with or do not understand the payment agreement. These e-mail or letter communications include PPL Electric's toll-free telephone number and Call Center hours of operation.

25. In the 10-day termination notice, customers are advised about emergency provisions for medical certifications. Under the pilot Website and IVR, Customers also are provided with information about medical certifications. The pilot Website and IVR systems provide medical certification information and ask if a medical condition exists in the home. If customers answer "yes," the system automatically places a three-day hold on any collection activity. A second message provides an explanation of how customers can proceed with having a doctor or nurse practitioner contact PPL Electric to report a medical condition. However, these customers continue to have the opportunity to establish or reinstate a payment agreement through the pilot Website and IVR systems.

26. PPL Electric recognizes the importance of personal communications as customers move closer to their scheduled termination dates. As a result, the pilot systems are designed with an additional consumer safeguard. Specifically, the pilot systems do not allow customers to use the Website or IVR to establish payment agreements if customers are within three days of their scheduled termination dates. These customers must call PPL Electric to discuss their overdue

bills and to establish payment agreements with a customer service representative. However, these customers continue to have payment options available to them via the Website or IVR, including payment of the overdue amount to reinstate a defaulted payment agreement or to report a payment.

27. Under the pilot Website and IVR, residential customers have additional protection against shut-offs. PPL Electric has linked payments completed through the pilot Website or IVR to its electronic system that produces work orders for field personnel who, among other things, terminate electric service. For example, if a termination was scheduled for Monday and the customer made a payment -- such as the full overdue balance or an amount sufficient to reinstate a defaulted payment agreement -- on a Saturday or Sunday through the Website or IVR, the system would automatically cancel the termination work order and update the Company's customer information system.

28. PPL Electric believes that allowing residential customers to establish, within limits, payment agreements via the Website or IVR provides substantial benefits to its customers. Important benefits for customers include, but are not limited to, the following: (a) providing two additional means by which customers may enter into payment agreements to avoid termination; (b) providing a means by which customers can, within limits, respond to termination notices outside normal business hours; (c) responding to the growing use of online and automated resources to manage billing and payment matter; (d) avoiding further collection action, such as termination of service; (e) offering options to customers, such as making an immediate payment or establishing a payment agreement, that fit their needs; and (f) providing automatic referrals to assistance programs, such as Customer Assistance Programs, for eligible customers.

29. Similarly, PPL Electric believes that allowing residential customers to establish payment agreements via the Website or IVR provides substantial benefits to PPL Electric. Key benefits for PPL Electric include, but are not limited to, the following: (a) improving customer satisfaction; (b) providing more flexibility to customers in addressing their overdue bills; (c) reducing Commission complaints, including Payment Assistance Requests; and (d) helping PPL Electric to better manage its significant increase in call volume.

C. Pilot Program Costs

30. Most of the costs for the two-year pilot Website and IVR systems were associated with staff time needed for planning, computer programming, and testing of the systems. PPL Electric did not have to purchase any computer software or servers to implement the pilot. Because the system is self-serve and pointed toward customers, there was minimal training required for PPL Electric’s customer service representatives.

31. The total cost of the project was approximately \$351,000 and the individual cost components appear in the following table.

Cost Components	Costs
Project costs for programming and business resources	\$301,667
Programming changes from suggestions of the OCA and PULP	14,014
IVR usability tests	35,000
Total	\$350,681

32. From November 16, 2010 through July 31, 2012, residential customers used the self-service payment agreements systems (Website and IVR) to set up 195,675 payment agreements. At an average blended cost of \$9 per collection calls, PPL Electric was able to avoid nearly \$1.8 million in costs over this period. With a system development and implementation cost of about \$351,000, the cost-benefit ratio for the self-serve payment agreement systems was very favorable.

D. Success of PPL Electric’s Pilot Website and IVR Systems

33. The key objectives of the two-year pilot Website and IVR systems were to: (a) determine if customers with overdue balances would use the self-serve payment options; (b) identify system or process issues impeding participation in the pilot; (c) offer customers more payment options and control; (d) provide customers with the flexibility to communicate with PPL Electric beyond normal business hours; and (e) reduce service terminations for payment-troubled customers.

34. The new payment agreement systems for the pilot Website and IVR programs went “live” on November 16, 2010. The table below shows that from November 16, 2010 through July 31, 2012, there were a total of 756,351 transactions established using the pilot Website and IVR programs, consisting of self-service payment transactions (557,976 or 74.0%) and payment agreements (195,675 or 26.0%). Of this total, there were 365,226 (48.5%) web transactions and 388,425 (51.5%) IVR transactions. The numbers of customers using the pilot Website and IVR to establish payment agreements were 28,508 (14.6%) and 167,167 (85.4%), respectively.

Transaction	Website	IVR	Total
Payments	336,718	221,258	557,976
Payment Agreements	28,508	167,167	195,675
Total	365,226	388,425	756,351

35. Although PPL Electric did not actively promote the availability of the self-serve payment agreement options to residential customers, there has been significant growth in the use of both pilot Website and IVR systems to set up payment agreements. The table below shows this growth from the first three months of the pilot (November 16, 2010 to January 31, 2011) and

the second quarter of 2012 (April 1, 2012 to June 30, 2012). Overall, the number of payment agreements established using both systems more than doubled (111.5%) during this period.

Transaction	Website	IVR	Total
11/16/10 to 1/31/11	2,423	13,213	15,636
4/1/12 to 6/30/12	4,901	28,162	33,063

36. An important objective of the pilot was to offer customers more options to avoid residential terminations. In the *PPL IVR Pilot Petition*, the Commission directed PPL Electric to track the number of terminations prevented by customers using the on-line self-serve systems to set up payment agreements.⁴ From April 1, 2011 through July 31, 2012, customers used the self-serve payment agreement options to cancel 8,166 service termination orders. The following two tables show the breakdown by month for 2011 and 2012.

2011

April	May	June	July	August	Sept.	October	Nov.
265	578	677	870	670	760	945	380

2012

April	May	June	July
649	739	815	818

28. As shown above, residential customers used the pilot Website and IVR self-serve systems to enter into payment agreements and cancel nearly 8,200 termination orders. If PPL Electric ultimately terminated service for one-third of these orders, the estimated costs would have been \$377,300.⁵ This potential for cost avoidance supports the favorable cost-benefit ratio associated with the self-serve payment agreement pilot.

⁴ Because the pilot began in mid-November 2010, the Company had already stopped its service termination activities for residential customers.

⁵ (\$140 per shutoff x 2,695 customers) The estimated cost per shut off includes labor, vehicles, supervision, collection calls, and collection letters.

29. PPL Electric also identified customer complaints and concerns about using the new self-serve payment agreement tools.⁶ In reviewing Commission complaints received by PPL Electric from November 16, 2010 through July 31, 2012, only seven (7) customers filed complaints regarding the pilot Website and IVR self-serve payment agreement options. However, these complaints generally were related to the payment terms offered rather than the systems themselves. During this same period, PPL Electric's Quality Assurance Specialists monitored approximately 12,300 customer calls. None of the Quality Assurance Specialists identified specific telephone calls where the self-serve payment agreement systems were a primary topic of concern for customers.

37. To better assess customers' opinions of using the self-serve payment options, PPL Electric developed an on-line survey to gather feedback from customers about their transactions.⁷ From January 1, 2011 through July 31, 2012, the Company received feedback from nearly 325 customers who had used the pilot Website and IVR systems. The results of these survey indicate that: (a) customers perceived the system as easy to use and convenient; (b) nearly 90% of the customers that completed the survey were very satisfied with the on-line transaction systems and 80% would use the systems again to complete transactions; (c) on-line payment agreement customers are more satisfied with PPL Electric than the general residential population; and (d) customers had a very high level of confidence about the successful completion of their on-line transactions.

⁶ The Company attempted to track these types of complaints primarily through three methods: (a) analyzing informal complaints filed with the Commission; (b) identifying concerns through the monitoring of customer calls; and (c) evaluating comments received from a customer satisfaction survey.

⁷ For customers who used the IVR to complete their transactions, the system prompted them to stay on the line to complete the survey. Customers who used the Website received a link to the survey with their confirmation e-mails regarding the completion of their payment agreements.

38. Finally, PPL Electric's self-serve payment agreement pilot won Chartwell, Inc.'s Best Practices Award for Customer Service in 2012. Chartwell is a nationally-recognized organization that conducts extensive benchmarking and best practices studies for utilities and other industries. This is a nationwide contest and Chartwell judged PPL Electric's submission against those of many other utilities using the following criteria: innovation, quality, operational efficiency results, and measured results.

E. PPL Electric's Expanded Website and IVR Systems Should Be Granted a Permanent Waiver from Section 56.97(a).

39. As shown above, PPL Electric has experienced a significant growth in customer "self-service" transactions, *i.e.*, via the Website or IVR. The number of transactions has grown from approximately 4.2 million in 2009 to about 6.5 million in 2011 -- an increase of 54.8%. These types of self-service interactions for PPL Electric are continuing to grow every year. It cannot be reasonably disputed that consumers are completing more and more interactions with businesses of all types through online and/or automated systems.

40. Given customers' proclivity to use online and automated means for completing transactions and the success of PPL Electric's two-year pilot Website and IVR system, the Company believes that providing customers the option of using the Website and IVR to set up payment agreements to avoid termination provides better service by giving customers more flexibility and options to avoid termination.

41. As explained above, customers using the Website or IVR to establish a payment agreement would have numerous opportunities to speak with a PPL Electric customer service representative. Further, after completing a transaction, the Company sends the customer a confirmatory communication via e-mail or letter, which provides PPL Electric's toll-free telephone number and Call Center hours of operation. The pilot also provides an additional

customer safeguard by requiring that customers within three days of their scheduled termination date must call PPL Electric to discuss how they can avoid termination of service. Stated otherwise, customers will be unable to set up payment agreements on either the Website or IVR systems if they are within three days from the scheduled termination date and, instead, must speak directly with a customer service representative.

42. As demonstrated from the success of PPL Electric's pilot Website and IVR systems, permitting customers to use the Website and IVR on a permanent basis to establish payment agreements to avoid termination will provide several important benefits to both PPL Electric and its customers.

43. The key benefits received by customers from expanding the Website and IVR system on a permanent basis include: (a) providing two additional means for customers to enter payment agreements and prevent terminations; (b) offering a method for customers to respond to termination notices at their convenience; (c) accommodating the growth of online tools to manage billing and payment matters; (d) avoiding termination of service; and (e) providing automatic referrals to utility-sponsored assistance programs.

44. The key benefits received by PPL Electric from offering the Website and IVR systems on a permanent basis include: (a) improving customer satisfaction; (b) providing more flexibility for customers to address their past due bills; (c) helping to manage overdue receivables; (d) lowering costs by reducing terminations; and (e) reducing call volume and other transactions.

45. Based on the foregoing, PPL Electric believes that its proposal to offer customers the permanent option of using the Website and IVR system to establish payment agreements to avoid termination is reasonable, effective, and in the public interest. Accordingly, PPL Electric

is requesting that it be granted a permanent waiver from the requirement in Section 56.97(a) that an “authorized employe explain” the reasons for the proposed termination and the available methods for avoiding termination, and allow PPL Electric to offer customers the permanent option of using the Website and IVR system to establish payment agreements to avoid termination.

III. CONCLUSION

46. PPL Electric believes that its proposal to offer customers the permanent option of using the Website and IVR system to establish payment agreements to avoid termination, together with the continued ability to directly contact a customer service representative at any time during the Call Center hours of operation, provides important benefits to both PPL Electric and its customers and, therefore, is in the public interest. Accordingly, PPL Electric respectfully requests that the Commission grant the Company’s expanded Website and IVR capabilities, as described herein, a permanent waiver from strict compliance with Section 56.97(a).

47. PPL Electric further requests that the Commission consider this Petition on an expedited basis. Timely approval of this Petition is important because the two-year waiver for the pilot Website and IVR program expires in November 2012.⁸ In order to continue to provide the successful benefits of the expanded Website and IVR system without interruption to customers, it is important that this Petition be considered on an expedited basis.

48. If the Commission is unable on this Petition prior to November 2012, the Company respectfully requests that, in the alternative, the Commission issue an Order or Secretarial Letter extending the current waiver of 52 Pa. Code 56.97(a) until such time that the Commission can fully consider this Petition. This will allow residential customers who have


⁸ PPL Electric began offering the pilot Website and IVR system on November 16, 2010.

overdue balances the opportunity to continue receiving the benefits and convenience of establishing their own payment agreements through the Website and IVR system.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Commission grant a permanent waiver from Section 56.97(a), and allow PPL Electric Utilities Corporation to offer customers the permanent option of using the Website and IVR system to establish payment agreements to avoid termination.

Respectfully submitted,

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Date: September 28, 2012

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, Timothy R. Dahl, 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: September 28, 2012

Timothy R. Dahl