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File #:

November 5, 2012

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: 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, Docket No. P-2012-2327036

Dear Madam Secretary:

This letter is intended to advise the Pennsylvania Public Utility Commission (“Commission”) that PPL Electric Utilities Corporation (“PPL Electric”) and the Office of Consumer Advocate (“OCA”) have reached an agreement in the above-captioned matter. As modified by the terms and conditions set forth herein, PPL Electric’s request for a waiver is unopposed. PPL Electric therefore respectfully requests that this matter not be set for evidentiary hearings, and that PPL Electric’s request for a waiver be approved as modified herein.

On September 28, 2012, PPL Electric filed a petition requesting 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. The Commission previously granted PPL Electric’s request for a two-year waiver of 52 Pa. Code § 56.97(a) 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. Docket No. P-2010-2168786. Given the success of the pilot Website and IVR system, PPL Electric sought Commission approval to continue to offer these Website and IVR capabilities on a permanent basis.

As explained in PPL Electric’s petition, the Website and IVR two-year pilot program has been highly successful. (PPL Petition, pp. 12-15.) PPL Electric further explained that the Website and IVR program provides important benefits to customers, including: (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. (PPL Petition, pp. 5-11)

On October 23, 2012, the OCA filed an answer to PPL Electric's petition. In its answer, the OCA agreed that the Website and IVR pilot program has provided important benefits to customers. (OCA Answer, p. 4.) The OCA also agreed with PPL Electric's decision to continue to offer the Website and IVR systems. (OCA Answer, p. 2.) However, the OCA recommended that the Commission deny the request for a permanent waiver and, instead, grant another temporary waiver with continued reporting requirements. (OCA Answer, pp. 2, 4.)

In response to the concerns set forth in OCA's answer, PPL Electric and the OCA have agreed that PPL Electric should be permitted to continue to offer customers the option of using the Website and IVR systems to establish payment agreements to avoid termination subject to the following conditions:

1. PPL Electric's request for a permanent waiver is modified to request a temporary waiver for a period of four (4) years, commencing December 1, 2012 and ending December 31, 2016;
2. PPL Electric will inform the Commission's Bureau of Consumer Services ("BCS"), OCA, and other interested parties at least 30 days in advance if it intends to make any substantive changes to the Website or IVR systems regarding establishing payment agreements;
3. PPL Electric will submit an annual statistical report to BCS and OCA by February 15th of every year;
4. PPL Electric will submit a comprehensive report to the Commission and OCA 60 days prior to the expiration of the four-year waiver for the Website and IVR systems; and
5. PPL Electric retains the right to request a permanent waiver for the Website and IVR systems at the end the four-year period.

PPL Electric has been authorized by counsel for OCA to represent that, with these conditions, OCA does not object to a four-year waiver from 52 Pa. Code § 56.97(a) to continue to allow PPL Electric to offer customers the option of using the Website and IVR systems to establish payment agreements to avoid termination subject to the foregoing conditions. Therefore, as modified by the conditions set forth above, PPL Electric's request for a waiver is unopposed by the OCA.

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For the reasons explained in its petition, PPL Electric believes that continuing to offer customers the 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 Website and IVR capabilities, as expanded under the pilot, a four-year waiver from strict compliance with Section 56.97(a) subject to the conditions described herein.

PPL Electric further requests that the Commission consider its request for a four-year waiver on an expedited basis. Timely approval of the waiver is important because the two-year waiver for the pilot Website and IVR program expires in November 2012. In order to continue to provide the successful benefits of the expanded Website and IVR systems without interruption to customers, it is important that, if possible, the requested waiver be in place by December 1, 2012.

Respectfully submitted,



Christopher T. Wright

CTW/

cc: Certificate of Service
Law Bureau
Bureau of Consumer Services

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

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Date: November 5, 2012



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