



November 28, 2012

Via E-Filing:

Rosemary Chiavetta
Secretary
Pennsylvania Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PUC Docket No. M-2012-2290911
PECO's Amended Universal Service and
Energy Conservation Plan for 2013-2015**

Dear Commissioners:

We oppose PECO's proposal mandating that statements of no income be notarized in order to enroll in PECO's low-income Customer Assistance Program (CAP). This is unnecessary and especially burdensome on customers with little or no income, especially for the 35,000 Philadelphians who lost General Assistance, their sole source of income, when the Commonwealth abruptly eliminated this program in August 2012.

Our organizations work with many Philadelphia area residents in PECO's service area with no income who work hard to meet their basic needs each month. Many of the people we work with rely on loans and help from friends or family members.

It is simply not necessary for the operation of PECO's CAP program to require that statements of no income be notarized. Most notaries charge \$3 to \$10 for their services. While this charge may seem nominal to many Philadelphians, for someone with no income, it can be insurmountable. As a result, many Philadelphians without income will be unable to participate in PECO's CAP Rate program.

This proposal will especially harm Philadelphians who recently lost their General Assistance. These individuals are all unable to work due to disability, domestic violence, or participation in an intensive drug and alcohol treatment program, or because they are caring for an unrelated child. General Assistance was the last resort program that provided these individuals with a temporary bridge to stability. Without it, they have no income.

The Department of Public Welfare (DPW) does not require that letters of no income be notarized. 55 Pa. Code § 183.5. PECO's CAP program should follow this example.



Thank you for the opportunity to submit comments on PECO's plan for its Customer Assistance Program.

Sincerely yours,

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On behalf of

ACHIEVA
ActionAIDS
ACTUP Philadelphia
Advocacy for Justice and Peace
Committee of the Sisters of St. Francis
of Philadelphia
AIDS Law Project of Pennsylvania
Broad Street Ministry
CareLink Community Support Services
Center for Advocacy for the Rights and
Interests of the Elderly (CARIE)
Delaware Valley Community Health,
Inc.
Disability Rights Network of
Pennsylvania
Every Mother is a Working Mother
Network
Family and Community Service of
Delaware County
Germantown Jewish Centre
Greater Philadelphia Coalition Against
Hunger
Housing Alliance of Pennsylvania
Interim House, Inc.
Lutheran Settlement House.
Maternity Care Coalition
Mayor's Office of Consumer Affairs,
City of Philadelphia

Mazzoni Center
Mental Health Association in
Pennsylvania
New Jerusalem Now
PA Alliance for Retired Americans
Pathways PA
The Philadelphia Alliance
The Philadelphia Coalition
Philadelphia Jewish Labor Committee
Philadelphia Unemployment Project
Resources for Human Development, Inc.
St. Vincent de Paul Medical Clinic
United Methodist Advocacy in
Pennsylvania
UUPLAN (Unitarian Universalist PA
Legislative Advocacy Network)
Vision for Equality
Women Against Abuse
Women's Law Project

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