



November 26, 2012

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

RE: PUC Docket No. M-2012-2290911

Dear Secretary Chiavetta:

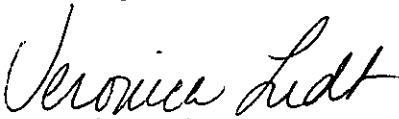
I run a free legal clinic as part of a human services organization in the Germantown section of Philadelphia. Our clients' incomes must be no more than 150% of the federal poverty level in order to qualify for our services. According to our database, 38.5% of this year's clients reported that they have no regular source of income.

I am writing to urge the PUC to require PECO make its low-income programs more affordable. I have seen the schedule which has CAP Rate A, but have never had a client who was enrolled in CAP at that level. This seems odd given the poverty of our client base. I mainly assist clients who have come for help in avoiding shut off after they have fallen behind in their CAP payments. In many circumstances they would not be in arrears if the payments were more affordable in the first place.

I have also recently encountered the program's inaccessibility while helping a client apply for CAP. She had been previously employed but had lost her job and had run out of unemployment benefits. She had always been a full paying PECO customer and I was trying to enroll her in CAP due to her change in circumstances. The back and forth with the required "proofs" of her zero income, including a notarized statement, were an unnecessary hardship and expense. It would make the program more accessible to require PECO to follow the same procedure as PGW by asking the applicant to submit a letter explaining how the person pays for basic living expenses.

Thank you for your consideration in this matter.

Sincerely,


Veronica Ludt
Legal Center Director

Electronic CC: gmcgovern@pa.gov, finksmith@pa.gov, cypage@pa.gov

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