

Nationalities Service Center

1216 Arch Street, 4th Floor

Philadelphia, PA 19107

Phone: 215-893-8400 • Fax: 215-735-9718

E-mail: info@nscphila.org • www.nscphila.org

December 10, 2012

Executive Director
DENNIS MULLIGAN Esq.

Board of Trustees
Dr. VERA TOLBERT

Via U.S. Postal Service and e-filing to:

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

Chair

KATHY OCHROCH
Esq.
1st Vice Chair

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

BETH SHAPIRO
Esq.
2nd Vice Chair

Dear Commissioners:

SARA A. LIMA
Esq.
Secretary

We oppose PECO's proposal to require Social Security Numbers (SSNs), or the alternate use of Individual Taxpayer Identification Numbers (ITINs) by those who have them, for enrollment in PECO's low-income Customer Assistance Program (CAP). Additionally, we ask you to order PECO to stop their policy and practice, wherever it exists, of demanding or requesting SSNs for enrollment.

WILLIAM W. MEZGER
Treasurer

Nationalities Service Center (NSC) is a non-profit organization that provides social, educational and legal services to immigrants and refugees in the Greater Philadelphia area. Our strength lies in the diversity of our clients and services. Since NSC's founding in 1921, our mission has been to help immigrants and refugees participate fully in American society. Each year, we help approximately 4,000 individuals from over 90 countries.

Marc Jay Altshuler
MD
Malik Boyd
Jose Campos
Esq.
JD, MA, MS

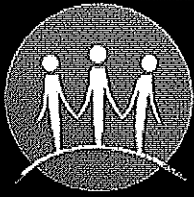
A SSN requirement, if allowed, would act to condition CAP enrollment upon having a particular immigration status, which is not an eligibility criterion for CAP. Numerous immigration statuses do not allow or require the immigrant to apply for a SSN. Otherwise eligible immigrant applicants for CAP would be unreasonably discriminated against if a SSN requirement were implemented. Such a requirement would have a disproportionate adverse impact in service areas with higher concentrations of immigrants, such as the Philadelphia area included in PECO's service territory.

Cecilia Cardesa-Lusardi
Debbie Cesario
Zeina El-Halabi
Stephanie Fielding
Margaret Harris
Sue Jacqueline
Kushinga V. Makamba
Esq.
Tendai Mutsinze
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Esq.
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Requiring SSNs is not necessary to the operation of the CAP. PECO can verify financial information and check on related CAP records by other means.

In addition, requiring people to disclose SSNs to participate in the CAP puts people at unnecessary risk. The collection and processing of unwarranted personal information such as SSNs provides access to numerous individuals who may or may not handle that information responsibly, makes the information vulnerable to cyber security breaches, raises the possibility of unintentional public disclosure, and can lead to identity theft, which is a costly and time-consuming problem to resolve. PECO and the PUC should not impose these numerous risks on low-income people seeking to participate in a basic energy assistance program.

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

Sincerely,

Steven Larin
Acting Executive Director

cc: gmcgovern@pa.gov
finksmith@pa.gov
cypage@pa.gov



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