



# Pennsylvania Immigration & Citizenship Coalition

*Advocating for immigrants, migrants and refugees*

**Member organizations include:**

American Immigration Lawyers Association  
(Philadelphia Chapter)

Arab American Community Development  
Corporation

Archdiocese of Philadelphia, Office for  
Pastoral Care for Refugees and Migrants

Bernardine Franciscan Sisters

Boat People SOS

Ceiba

Center for Literacy

Children's Crisis Treatment Center, West  
African Refugee Assistance

Church World Services

Community Legal Services

Congreso de Latinos Unidos

Disability Rights Network of Pennsylvania

Esperanza Immigration Legal Services

Friends of Farmworkers

Health Federation of Philadelphia

HIAS Pennsylvania

Jaisohn Center

Jewish Educational and Vocational Services,  
Refugee Assistance Program

Juntos

Latino Leadership Alliance of Bucks County

Lutheran Advocacy Ministry of Pennsylvania

Lutheran Social Service of South Central  
Pennsylvania

Manos Unidas Hispanic American Center

Maternity Care Coalition

Nationalities Service Center

New Sanctuary Movement

New World Association

PhilaPOSH

Pennsylvania Immigration Resource Center

Pennsylvania Institutional Law Project

Philadelphia Corporation for Aging

PRIME - Ecumenical Commitment to  
Refugees

Project SHINE, Center for Intergenerational  
Learning, Temple University

Southeast Asian Mutual Assistance  
Associations Coalition

United Neighborhood Centers of  
Northeastern PA

Victim/Witness Services of South  
Philadelphia

Welcoming Center for New Pennsylvanians

December 10th, 2012

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

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 are writing to 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.

The Pennsylvania Immigration & Citizenship Coalition (PICC) is a diverse coalition of 50 member organizations and numerous individuals that represents the needs of immigrants, migrants, refugees and other new Americans living in Pennsylvania to policy makers, public officials, and the general public. We seek to educate the public and develop support for fair policies that welcome and sustain immigrants.

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. There are many kinds of immigration statuses that 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.

Immigrants would also be disproportionately impacted since they are more likely to live in poverty than U.S.-born citizens. For example, in 2007, 28% of US-born citizen children were low-income (lived in households with incomes below 150% of the FPL) compared to 50% of immigrant children. Many hard-working and vulnerable immigrant families would be impacted

by this new requirement. 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,  
Natasha Kelemen,  
Executive Director

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