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1424 Chestnut Street, Philadelphia, PA 19102-2505  
Phone: 215.981.3700  
Web Address: www.elsphila.org

October 21, 2013

**By eFiling**

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

Re: Petition of PECO Energy Company for Approval of its Default Service Program, Docket No. P-2012-2283641

PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015, Docket No. M-2012-2290911

Dear Secretary Chiavetta:

Enclosed for eFiling please find the **“COMMENTS of TURN et al. (Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia), Concerning PECO Energy’s September 30, 2013 Report of Alternative Models for the Delivery of Customer Assistance Program (CAP) Benefits Submitted Pursuant to the Commission’s April 4, 2013 Order,”** in the above-captioned matter. Copies of the enclosed have been served electronically and by hard copy, upon the Administrative Law Judge and all other parties on the Service List.

Sincerely,

Thu B. Tran, Esquire  
Robert W. Ballenger, Esquire

Attorneys for TURN et al.

Enclosure

cc: Administrative Law Judge Cynthia Fordham  
Service List

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company Universal Service :  
and Energy Conservation Plan for 2013-2015 :  
Submitted in Compliance with 52 Pa. Code :  
§§ 54.74 and 62.4 : Docket No. M-2012-2290911

**COMMENTS**

of

**TENANT UNION REPRESENTATIVE NETWORK (“TURN”)  
and  
ACTION ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA  
(COLLECTIVELY “TURN et al.”)**

Concerning PECO Energy’s September 30, 2013 Report of Alternative Models for the  
Delivery of Customer Assistance Program (CAP) Benefits Submitted Pursuant to the  
Commission’s April 4, 2013 Order

October 21, 2013

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## Comments of TURN et al.

### I. Introduction

Since 1984, when PECO's CAP started out as a PIP plan design, it has gone through a number of modifications. In 1996, the Commission approved a CAP Rate design as part of a settlement. In 2000, the Commission recommended that PECO implement a PIP plan design. More recent orders supported the premise that PECO's CAP Rate has been unaffordable for many of its participants. Notwithstanding the USECPs approved in 2008 (for 2007 – 2009) and 2010 (for 2010 – 2012), APPRISE, PECO's third-party evaluator, raised questions in its 2012 program evaluation regarding PECO's rate discounts and affordability. Order at 9.

On February 28, 2012, PECO filed its USECP for 2013-2015. On October 15, 2012, PECO filed an amended USECP for 2013-2015, the Plan under review herein. PECO's original filing and the amended Plan are posted on the Commission's website. Further, on October 31, 2012, PECO submitted the APPRISE six-year evaluation report in compliance with 52 Pa. Code § 54.76. APPRISE noted opportunities for PECO to improve its program impact including suggesting that PECO try to increase affordability for lowest poverty group participants and that PECO target lowest income CAP customers who exceed CAP usage discount limits for LIURP. See APPRISE Evaluation Report at 124.

On November 8, 2012, the Commission entered a Tentative Order in the matter of PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4, Docket No. M-2012-2290911 ("Tentative Order" or "TO"). Several parties filed comments and reply comments, including Tenant Union Representative Network ("TURN") and Action Alliance of Senior Citizens of Greater

Philadelphia (“Action Alliance”) (collectively “TURN et al.”). After evidentiary hearings, including testimony and briefs, Administrative Law Judge Cynthia Fordham certified the record, on March 1, 2013.

On April 4, 2013, the Commission issued an Order in this matter, directing PECO to make certain changes to its USECP. The Commission also directed PECO to test various models to improve the affordability of its Customer Assistance Program to participants, subject to the limitation of not placing more of a financial burden on the non-participants. Order at 24. In the Order, the Commission also expressed interest in more research and investigation for a fixed credit PIP design, or fixed credit option PIP (“FCO PIP”). Order at 23.

The Order directed PECO to conduct an analysis and serve a full report to the Commission and parties to this proceeding by September 30, 2013. Order at 24-25. On September 30, 2013, PECO submitted its “Report of Alternative Models for the Delivery of Customer Assistance Program (CAP) Benefits Submitted Pursuant to the Commission’s April 4, 2013 Order” (“PECO Report”). After September 30, 2013, the parties have a 20-day comment period and a 10-day reply comment period. Order at 25. The Commission will render a decision on the fixed credit PIP approach thereafter. *Id.* While allowing PECO to continue its current tiered CAP Rate system in the interim, the Commission emphasized that “moving forward, this Commission will expect PECO to comply with the CAP Policy Statement in future USECP filings or, alternatively, provide substantial justification for why deviations from the policy are warranted.” *Id.*

In the PECO Report, PECO analyzed and contrasted four alternative program designs:

- (1) A seven-tier block discount program (Status Quo)

(2) A seven-tier block discount program with redeployment of benefits from the highest tiers to the poorest tiers, seasonally adjusted discounts and an increase to one standard deviation from average energy use of the amount of kWh to which the block discount would apply

(3) A straight percentage of income plan

(4) A fixed credit plan (Fixed Credit Option) that provides each low-income customer with a fixed credit each month that is based on two elements: previous 12 month's electricity use and price.

These Comments are submitted on behalf of TURN et al. in response to the PECO Report. In summary, TURN et al. submit that all the analysis presented to the Commission in this proceeding, including this recent PECO Report, weighs strongly in favor of requiring PECO to eliminate the current CAP Rate tiered design and to move to a Percentage of Income Payment (PIP) plan. Further, due to the internal inconsistencies in the PECO Report and the lack of additional explanation for calculations that the Commission and parties have questioned in the earlier stage of the proceeding, TURN et al. urge the Commission to hold hearings to provide a proper technical review of the alternative CAP models.

## **II. One-Time IT Transition Costs are a Reasonable Investment**

IT Transition Costs are the first factor discussed by PECO in its September 30<sup>th</sup> Report. PECO Report at 13-14. PECO's original estimate in earlier comments and reply comments for change to a PIP was \$4.5-\$6 million; yet, in its testimony two months later, that cost had risen to \$7.7 to \$12.8 million. Order at 22. In the current PECO Report, PECO now says the cost estimates are \$6.8 to \$11.4 million to move to either a PIP or FCO PIP. PECO Report at 14.

PECO's CAP program designs have evolved significantly since 1984, including starting as a PIP then changing to several different program designs to end at the current 7-tiered design in 2013. There has been an accommodation for one-time IT transition costs and one-time change management costs with each of these several CAP design changes. Such IT changes and costs are an inherent business need for the evolution of a major low income program.

The PECO Report reiterates its concerns that the cost of moving to a PIP of any form, including the FCO, would be significant. IT Transition Costs appear to be a key reason for PECO's resistance to moving to a PIP. However, TURN et al. submit that it is shortsighted to stay with the status quo because of unwillingness to submit to change and its attendant costs, when all assessments indicate that the status quo approach is untenable.

Staying with the status quo would have even greater costs. In its April 4, 2013 Order, the Commission noted that PECO forgave \$25 million of accumulated in-program CAP balances in Fall 2011. Order at 19. While PECO may be commended for such forgiveness, the Commission highlighted that "the underlying CAP design that enabled the accrual of \$25 million of arrearages is PECO's CAP Rate Tier." Id. In a separate Statement, Commissioner Witmer discussed the \$25 million in arrearages and also cautions that "[i]f the current structure is left in place, similar arrearages will build again." Statement of Commissioner Pamela A. Witmer, April 4, 2014, M-2012-2290911.

TURN et al. agree with the Commission's assessment that "funds could be invested in correcting that unaffordability cycle through another CAP design. In our opinion, it would be wiser to invest such resources in preventing such arrearages from recurring." Order at 19. The Commission is justifiably concerned that PECO will continue to incur such arrearages and will seek to pass such costs to ratepayers in the future. Id. Moreover, such arrearages point to an

unmeasured social cost – that low income families not receiving affordable PECO bills will experience shut offs that would not be necessary in a program that provides consistently affordable bills. TURN St. 1-R at 6-7.

The FCO PIP is significantly more complicated than the straight PIP and would logically require greater IT transition costs and change management costs. The FCO PIP bill requires at least a five (5) step calculation including compilation of massive historic usage data, and regular adjustments to account for changes in generation pricing and usage patterns. PECO Report, Appendix B; see also Order at 24. In contrast, the straight PIP bill involves at most a three (3) step calculation to arrive at a fixed monthly bill based on a percentage of income, without the need to compile, incorporate and update generation pricing or historic usage data. The PECO Report's IT cost estimate of \$6.8 to \$11.5 million was based on an assessment of the cost to complete work on the FCO PIP. The IT costs for a straight PIP would rationally be significantly lower than the costs for a FCO PIP.

### **III. Shortfall Costs: A PIP Achieves Near 100% Affordability at the Same Cost as the Current 7-Tiered Program**

The PECO Report shows a PIP can achieve close to 100% affordability at the same price (\$76.8 million) as PECO's current 7-tiered program (\$76.4 million) that only achieves 65% affordability. In other words, while a PIP would cost approximately the same as the Current 7 Tier Program in terms of subsidy or "Shortfall" costs, (PECO Report at 15, Table 4), the PIP achieves near 100% affordability (6% unaffordability due to minimum bill) while the Current 7 Tier Program (Status Quo) only achieves 65% affordability (35% unaffordability) for its predominantly non-heating electric CAP customers (PECO Report at 4, Table 1; see also PECO

St. 1, at 9, Table 4; Tr. at 98, line 22-25, at 103, line 9-16, at 107, line 18 through 108, line 6.).

Cost offsets from eliminating over-subsidies allow a PIP to direct funds to CAP customers who were under-subsidized to achieve greater levels of affordability without increasing overall cost. Dr. Peach's direct testimony demonstrates that by eliminating the over-subsidies which occur in the Current 7 Tier Program, the PIP preserves dollars and insures that each dollar is used exactly to meet the affordability criteria as defined in the Commission's CAP Policy Statement. TURN et al. St. 1, at 5 line 12 through 7 line 3.

The seven-tier block discount program with redeployment of benefits (7-tier R/S/SD) has significantly higher shortfall costs of \$85.4 million (\$9 million more than status quo). PECO Report at 15, table 4. Since the Commission has directed PECO only to consider CAP designs that do not place more of a financial burden on non-participants, this 7-tier R/S/SD approach should be soundly rejected.

According to the PECO Report, the FCO PIP has a shortfall cost of a few million dollars less at \$70.6 million. However, as discussed further below, while the FCO PIP would reduce depth of unaffordability (PECO Report at 19, Table 9), it suffers from key deficiencies including an increase in the breadth, or instances, of unaffordability.

#### **IV. Affordability (Unaffordability)**

##### **1. A PIP Design is the Most Precise**

On October 31, 2012, PECO submitted the APPRISE six-year evaluation report in compliance with 52 Pa. Code § 54.76. Under the Summary of Findings and Recommendations section, APPRISE noted that “[o]ne of the key findings in this report was that a significant percentage of lower tier CAP participants do not reach the PUC affordability targets after

receiving the CAP discount,” and

[t]he only way that a utility company can achieve the PUC target for all CAP participants is to set the customer’s payment as a fixed percentage of the customer’s income, with no limit on the maximum discount.

Exh. LF-8, APPRISE October 2012 Evaluation Report (hereinafter, “APPRISE”), at 117-18 (emphasis added).<sup>1</sup> Throughout these proceedings, TURN et al. has also recommended a PIP to provide fixed monthly bills as a percentage of income, but has agreed that a maximum CAP credit may be applied on a system-wide average basis.

The record in this proceeding provides strong support for the recommendation that PECO’s current CAP program should be redesigned into a PIP plan. A PIP can achieve much greater levels of affordability without increasing annual costs. A move to a PIP would be well worth the investment for many years of optimal CAP performance. The CAP Policy Statement’s control features would apply to a PIP to manage costs, including a maximum CAP credit that should be applied on a system-wide average basis. The record weighs heavily in favor of a PIP CAP design as the most optimal option to achieve high levels of affordability.

## **2. Deficiencies of the FCO PIP**

A critical defect of a FCO PIP is that it will return customers to full residential rates when the CAP credits run out. Credits will run out under a FCO PIP scenario when a customer’s usage is higher than the historic calculation due to weather-related reasons or merely because utility rates are higher this year than last year, the period from which the fixed credit is calculated. Commissioner Witmer has also raised concern that PIPs in other jurisdictions have “created

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<sup>1</sup> [http://www.puc.pa.gov/General/pdf/USP\\_Evaluation-Peco.pdf](http://www.puc.pa.gov/General/pdf/USP_Evaluation-Peco.pdf)

situations where customers' CAP credits run out before the end of the year." Statement of Commissioner Witmer, April 4, 2013.

Rather than set a fixed credit, TURN, et al. recommends using a 125% usage limit as a reasonable financial control tool for a PECO PIP. TURN St. 1-R, Peach Rebuttal at 8, Order at 22. The 125% usage limit is a reasonable limit and an adequate control tool on PIP program costs. The advantages of this control tool are (A) it can be automated by computer scanning to detect movement towards 125% and the customer can be contacted and coached back to normal use in many cases, and (B) when caused by a condition outside of customer control the CAP Policy Statement already provides exceptions. TURN St. 1-R, at 8.

OCA Witness Colton's direct testimony discusses a PIP with fixed credit CAP design option and, in support of such, cites to the relative success of a fixed credit PIP in Colorado. This Colorado model has intrigued the Commission leading to the directive that PECO study this model. However, Colorado's affordability targets for low income customers (as a percentage of income) are significantly lower than Pennsylvania's, meaning that Colorado's low income customers receive significantly lower bills under an FCO than Pennsylvania's customers would.

In Colorado, the energy burden target maximums are only 3% for non-heating electricity and 6% for electric heating (or electric non-heating combined with gas heating) bills.<sup>2</sup> In

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<sup>2</sup> 4 C.C.R.723-3, 3412(h)(II)(B)(i):

(1) For electric accounts for which electricity is the primary heating fuel, maximum participant payments shall be set at the following percentage of income burdens:

- (a) Household income at or below 75 percent of Federal Poverty Level: four percent of income.
- (b) Household income exceeding 75 percent but at or below 125 percent of Federal Poverty Level: five percent of income.
- (c) Household income exceeding 125 percent but at or below 185 percent of Federal Poverty Level: six percent of income.

(2) For electric accounts for which electricity is not the primary heating fuel, maximum customer payments shall be set at the following percentage of income burdens:

- (a) Household income at or below 75 percent of the Federal Poverty Level: two percent of income;
- (b) Household income exceeding 75 percent but at or below 125 percent of the Federal Poverty Level: two and one-half percent of income; and

contrast, Pennsylvania's PIP energy burden targets can be as high as 7% of income for non-heating electricity bills, and as high as 17% of income for electric heating (or electric non-heating combined with gas heating). Further, Colorado's PIP has a higher maximum income eligibility level of 185% of the poverty level, compared with Pennsylvania's general CAP maximum income eligibility level of 150% of poverty level. TURN St. 1-R, at 2. It would be illogical to suggest that PECO's customers would fare just as well as customers under the Colorado FCO PIP, when the energy burdens upon which the Colorado model is based are less than half of those being applied in the PECO analysis.

TURN et al. also questions whether the FCO PIP would be easier for customers to understand than the current 7-tiered system. The following narrative formula is based on the description in the Colorado FCO:

Step 1 – Determine the Estimated Annual Usage-Based Bill

Step 2 – Determine the Household Annual Income and Household Poverty Level

Step 3 – Multiply the Household Annual Income by the EBF for the applicable PECO CAP group to determine the Annual Energy Burden

Step 4 – Subtract the Annual Energy Burden from Step 3 from the Estimated Annual Usage-Based Bill in Step 1 to establish the annual CAP Credit

Step 5 – Divide that annual CAP Credit by 12 to equal the monthly Fixed Credit.

Order at 24. In contrast, a straight PIP would require only Steps 2, 3 and 5 in the vast majority of circumstances. Customers can easily understand a fixed monthly PIP bill that is based on a

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(c) Household income exceeding 125 percent but at or below 185 percent of the Federal Poverty Level: three percent of income.

4CCR 723-4, 4412(h)(II)(B)(i):

(1) For gas accounts, maximum participant payments shall be set at the following percentage of income burdens:

(a) Household income at or below 75 percent of Federal Poverty Level: two percent of income.

(b) Household income exceeding 75 percent but at or below 125 percent of Federal Poverty Level: two and one-half percent of income.

(c) Household income exceeding 125 percent but at or below 185 percent of Federal Poverty Level: three percent of income.

percentage of income. Incorporating an annual bill and annual CAP credit significantly complicates the explanation of the CAP bill, leading to possible billing disputes due to the customer's lack of understanding. Likewise, the corresponding requirement that the annual bill and annual CAP credit be recalculated on a periodic basis can add significant administrative costs, including IT programming that would not be needed with a straight PIP.

### **3. Low-Income Customers With "Affordable" Non-CAP Bills May Still Benefit From the USECP**

PECO notes that some customers who currently receive a CAP discount may not receive any discount, under a PIP or FCO PIP, because PECO calculates that their current usage levels result in bills deemed affordable under PUC guidelines. This calculation is based on PECO bills at a single point in time, and fails to take into account changes in customer and household needs and fluctuation in energy prices. Furthermore, as noted by OCA and TURN et al., these customers could still benefit from arrearage forgiveness. OCA St. 1R, at 15; TURN et al. St. 1, at 19, fn 6. Additionally, all customers with household income at or below 150% FPIG, whether or not they receive a discount from a PIP bill based on usage and income levels, would still have LIHEAP grants available to them to assist with utility bill payment. LIHEAP maximum income eligibility currently remains at 150% FPIG, the same as the maximum income level for participation in a PUC approved customer assistance program.

The LIURP component of the USECP would not only be available, but, by viewing the USECP programs together, the goal is not only to provide affordable bills, but also to enable customers to use less energy, obviating the need for discounts in the first place.

## **V. Effect on Bad Debt Expense**

TURN et al. note that in the comparison of the net change to bad debt among the four different models assessed, the PIP results in a \$0 change to bad debt. PECO Report at 21. However, the PECO Report is internally inconsistent when bad debt and the PIP model is discussed in the following report topic “Terminations.” The PECO Report states that “[w]hen customer bad debt increases, PECO must increase its service termination activity to control that bad debt.” Id. at 22. It is then surprising that PECO predicts 1,500 to 2,000 in additional terminations resulting from a change to a PIP, when on the prior page PECO reported a \$0 dollar net change to bad debt. Id. PECO recognizes that the status quo net change to bad debt of \$0 results in zero net change to terminations, but it is then counterintuitive for PECO to assert with no explanation that the \$0 net change in bad debt for the PIP will result in 1,500 to 2,000 in more terminations.

The internal inconsistencies in this part of the PECO Report call into question the validity of this analysis. For this reason, TURN et al. urge the Commission not to accept the PECO Report at face value and to hold hearings to conduct a proper technical review.

## **VI. Terminations**

In the PECO Report, PECO again purports to predict the number of service terminations that would occur if it were required to move to a PIP or a FCO PIP. However, PECO provides no showing that its analysis now is any more reliable than it was in the earlier evidentiary proceedings when the Commission noted that PECO conceded that “these estimates are not derived from any robust quantitative analysis, but were rather built on a host of assumptions the basis for which is completely unknown.” Order at 17. PECO also provides no indication of

what CAP tiers these customers are currently enrolled in, in order to determine how PECO's prediction may affect customers at the higher or lower end of the CAP rate eligibility scale.

To the extent that customers who will receive zero CAP benefit under a PIP will be at increased risk of service termination, the risk can be mitigated as discussed above in the section regarding the loss of CAP benefits to customers deemed to be already receiving affordable bills. However, TURN et al. submit that it is questionable to estimate an increased number of terminations for a PIP when the result of implementing a PIP is to reduce CAP population unaffordability by approximately 30%. PECO Report at 4, Table 1.

Again, due to the internal inconsistencies, TURN et al. submit that hearings are warranted to conduct a technical review of the PECO Report.

## **VII. Effect on Conservation and Shopping Decisions**

TURN et al. submit that price signals are not required in order to incent CAP households to conserve energy. PECO's position ignores that CAP customers who participate in a PIP have access to weatherization assistance that would reduce the need for future discounts to maintain affordability. APPRISE's latest evaluation of PECO's CAP shows that CAP customers are more likely to reduce usage than increase usage after enrollment. APPRISE, at xiv, 79-8. This may have resulted from PECO's practice of targeting CAP high users for LIURP services. If usage limits are deemed necessary, TURN et al. recommend that a 125% usage limit is a reasonable limit and an adequate control tool. This limit is consistent with the Commission's Final Investigatory Order in which the Commission agreed that "125% is a more reasonable standard than 110%." Final Investigatory Order in Customer Assistance Programs: Funding Levels and

Cost Recovery Mechanisms, Docket No. M-00051923 (Order entered December 18, 2006), at 47.

TURN et al. also submit that the extension of competitive supply to low-income CAP customers could be implemented in a reasonable fashion to meet the policy goals both of providing affordability and allowing all customers to access the benefits of energy shopping. To do so, alternative suppliers would be required to charge no more than the PTC for CAP customers. This would benefit all residential customers by not increasing the cost of discounts provided by the CAP program. TURN et al. agree with CAUSE-PA in that any shopping plan must include minimum consumer protections, including but not limited to:

- a. CAP customers' monthly asked to pay amounts are affordable;
- b. CAP customers maintain their full universal service program protections;
- c. CAP customers experience no reduction or loss of benefits as a result of shopping;
- d. CAP customers are assured that the competitive price charged to them is always at or below PECO's Price to Compare;
- e. CAP customers who leave CAP are able to switch to an alternate supplier or back to the Default Service Provider at any time without any fee or penalty;
- f. CAP customers are exempt from security or other deposit requirements that an EGS might otherwise impose; and
- g. Written information regarding the rights and responsibilities of CAP customers who shop must be provided.

TURN St. 1-R, at 9, quoting CAUSE-PA St. No. 1, at 7. Any implementation of CAP shopping that does not provide adequate consumer protections for CAP customers undermines

affordability and places competitive supply in conflict with affordability – placing two policy goals that can both be achieved at odds with one another.

### **VIII. Other Provisions of the Commission’s April 4, 2013 Order**

The Office of Consumer Advocate filed in this docket, on May 17, 2013, Comments of the OCA in which the OCA highlights areas where PECO’s revised USECP may not be in compliance with the Commission’s April 4, 2013 Order. TURN et al. urge the Commission to direct PECO to respond to the May 17, 2013 Comments of the OCA and to make any necessary USECP revisions to comply fully with the Commission’s April 4, 2013 Order.

### **IX. Conclusion**

TURN et al. urge the Commission to order PECO to eliminate its current CAP Rate design and implement a percent of income plan (PIP) design consistent with the CAP Policy Statement. The cycle of rate tier modifications, Commission Orders and further rate tier modifications has occurred over the past 13 years. Evaluators and commenters alike continue to question rate tier viability as an efficient CAP program design. Order at 22. The only way to ensure that each CAP customer’s CAP bills meet energy burden targets is for PECO to return to a PIP. This approach was identified by APPRISE, PECO’s independent evaluator, as the only viable means of achieving affordability for all CAP customers.<sup>3</sup> To that end, PECO should convert back to a PIP CAP design that provides bills that meet energy burden targets. Under a PIP, CAP customers receive a fixed predictable bill each month that can easily be understood to be a certain percentage of their income. The PIP approach would reduce the over-subsidy of

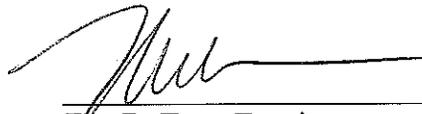
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<sup>3</sup> See APPRISE Evaluation Report at 117-18 and Comments of Gil Peach received November 17, 2012 submitted to this docket.

those CAP customers who, in the current discount model, already receive bills that are lower than the energy burden targets, which would be a significant cost offset in a change to a PIP.

Further, TURN et al. request that hearings be held to conduct a proper technical review of the PECO Report, which contains internally inconsistent data and flawed analysis. PECO should also be directed to respond to the May 17, 2013 Comments of the OCA in which the OCA highlights areas in the revised USECP where PECO fails to comply with the Commission's April 4, 2013 Order in this matter.

Respectfully submitted,



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Thu B. Tran, Esquire  
Robert W. Ballenger, Esquire  
Attorneys for TURN and Action Alliance  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 981-3777

Date: October 21, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval of its Default Service Program	:	:	P-2012-2283641
PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015	:	:	M-2012-2290911

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served copies of the **Comments of TURN et al. Concerning PECO Energy's September 30, 2013 Report of Alternative Models for the Delivery of Customer Assistance Program (CAP) Benefits Submitted Pursuant to the Commission's April 4, 2013 Order**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA E-MAIL AND FIRST CLASS MAIL**

Elizabeth Rose Triscari, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
717-783-2525  
[etriscari@pa.gov](mailto:etriscari@pa.gov)

Ward L. Smith, Esquire  
Assistant General Counsel – Exelon  
2301 Market Street, S23-1  
Philadelphia, PA 19101  
215-841-6863  
[ward.smith@exeloncorp.com](mailto:ward.smith@exeloncorp.com)  
***Representing PECO***

Christy M. Appleby, Esquire  
Candis A. Tunilo, Esquire  
Amy Hirakis, Esquire  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street Suite 500  
Harrisburg, PA 17101-1923  
717-783-5048  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[ctunilo@paoca.org](mailto:ctunilo@paoca.org)  
[ahirakis@paoca.org](mailto:ahirakis@paoca.org)

Daniel Clearfield, Esquire  
Deanne M. O'Dell, Esquire  
Edward G. Lanza, Esquire  
Eckerts, Seamans, Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101-1248  
717-232-7162  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[elanza@eckertseamans.com](mailto:elanza@eckertseamans.com)  
***Representing Retail Energy Supply  
Association***

Kenneth M. Kulak, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
215-963-5382  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
**Representing PECO**

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
717-237-5437  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)  
[abakare@mwn.com](mailto:abakare@mwn.com)  
**Representing PAIEUG**

Amy M. Klodowski, Esquire  
FirstEnergy Solutions Corp.  
800 Cabin Hill Drive  
Greensburg, PA 15601  
724-838-6765  
[aklodow@firstenergycorp.com](mailto:aklodow@firstenergycorp.com)  
**Representing First Energy Solutions Corp**

Brian J. Knipe, Esquire  
Buchanan, Ingersoll and Rooney PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101  
717-237-4820  
[brian.knipe@bipc.com](mailto:brian.knipe@bipc.com)  
**Representing First Energy Solutions Corp**

Laurie L. Baughman, Esq.  
Elizabeth R. Marx, Esq.  
**PA Coalition Against Domestic Violence**  
3605 Vartan Way  
Harrisburg, PA 17110  
717-671-4767  
[lbaughman@pcadv.org](mailto:lbaughman@pcadv.org)  
[emarx@pcadv.org](mailto:emarx@pcadv.org)  
**Representing PCADV**

Todd S. Stewart, Esquire  
Hawke, McKeon & Sniscak LLP  
100 North Tenth Street  
P O Box 1778  
Harrisburg, PA 17105-1778  
717-236-1300  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
**Representing Dominion Retail, Inc. &  
Interstate Gas Supply Inc.**

Harry S. Geller, Esquire  
Patrick M. Cicero, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
717-232-2719  
[hgellerpulp@palegalaid.net](mailto:hgellerpulp@palegalaid.net)  
**Representing CAUSE PA**

Amy E. Hamilton, Esquire  
Noel Trask, Esquire  
Exelon Business Services Co.  
300 Exelon Way  
Kennett Square, PA 19348  
610-765-6649  
[amy.hamilton@exeloncorp.com](mailto:amy.hamilton@exeloncorp.com)  
**Representing ExGen**

Melanie J. Elatieh, Esquire  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
610-992-3750  
[elatiehm@ugicorp.com](mailto:elatiehm@ugicorp.com)  
***Representing UGI Energy Link***

H. Gil Peach, Ph.D.  
H. Gil Peach & Associates, LLC  
16232 NW Oak Hills Drive  
Beaverton, Oregon 97006  
503-645-0716  
[hgilpeach@scanamerica.net](mailto:hgilpeach@scanamerica.net)

Veronica Ludt, Legal Center Director  
109 E. Price Street  
Philadelphia, PA 19144  
215-438-1390 (Legal Center)  
***Representing Face to Face***

Natasha Kelemen, Executive Director  
Pennsylvania Immigration &  
Citizenship Coalition  
2100 Arch Street, 7<sup>th</sup> Floor  
Philadelphia, PA 19103  
215-832-0527  
[admin@paimmigrant.org](mailto:admin@paimmigrant.org)

Steven Larin  
Acting Executive Director  
Nationalities Service Center  
1216 Arch Street, 4<sup>th</sup> Floor  
Philadelphia, PA 19107  
[info@nscphila.org](mailto:info@nscphila.org)

Will Gonzalez, Executive Director  
CEIBA  
149 W. Susquehanna Avenue  
Philadelphia, PA 19122  
215-634-7245  
[will.gonzalez@ceibaphiladelphia.org](mailto:will.gonzalez@ceibaphiladelphia.org)

Maripat Pileggi, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
215-981-3788  
[mpileggi@clsphila.org](mailto:mpileggi@clsphila.org)  
***Representing ACHIEVA, et al.***

Respectfully submitted,



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Thu B. Tran, Esquire  
Robert W. Ballenger, Esquire  
Josie B. H. Pickens, Esquire  
Attorneys for TURN et al.

COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 981-3777

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