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November 1, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Subject: PECO Energy's Report on Alternative Models for the Delivery of
Customer Assistance Program (CAP) Benefits Submitted Pursuant to the
Commission's April 4, 2013 Order in Docket No. M-2012-2290911
Reply Comments

Dear Secretary Chiavetta:

On April 4, 2013, the Commission ordered PECO to prepare and submit a report on alternative methods for the delivery of customer assistance program benefits (the "PECO Report"). Pursuant to the Commission's timeline established in that Order, PECO filed its report on September 30, 2013. On October 21, 2013, comments to that report were filed by the Office of Consumer Advocate, TURN *et al.*, and CAUSE-PA. This filing contains PECO's reply comments and the following Appendices to address various issues raised in comments of the OCA, CAUSE-PA, and TURN *et al.*

- Appendix A: PECO's Fourth Annual Report on CAP Customer Consumption and Credits
- Appendix B: Seasonal Usage Variations
- Appendix C: Value of Benefits Taken From the 40,000
- Appendix D: Collection Activity, Affordable vs. Unaffordable
- Appendix E: Exhibit LF-1, Data and Assumptions Supporting Terminations Analysis

The filing deadline for reply comments in this matter was nominally October 31. However, counsel for PECO was under the weather for most of this week, which delayed finalization of PECO's Reply Comments. There are no further responsive pleadings in this docket, and the Commission has stated that any action from PECO's Report will next be addressed in PECO's February 2, 2015 Three-Year Plan filing, which is more than 14 months from now. PECO, therefore, respectfully suggests that there is no harm to its filing these Reply Comments on November 1 rather than October 31, and requests that they be accepted *nunc pro tunc*.

Rosemary Chiavetta, Secretary

November 1, 2013

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Thank you for your assistance in this matter and please direct any questions regarding the above to Dick Webster, Regulatory Policy & Strategy (215) 841-5777.

Sincerely,

Richard G. Webster, JR. /RAS

Richard G. Webster, Jr.
Vice President
Regulatory Policy & Strategy

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015 :
: **M-2012-2290911**

**PECO Energy Company's Reply Comments To
Comments of the OCA, TURN and CAUSE-PA on
PECO Energy Company's Report on Alternative Methods for the Delivery of Customer Assistance
Program Benefits**

PECO Energy Company ("PECO") respectfully submits its reply comments.

On April 4, 2013, the Commission ordered PECO to prepare and submit a report on alternative methods for the delivery of customer assistance program benefits (the "PECO Report"). Pursuant to the Commission's timeline established in that Order, PECO filed its report on September 30, 2013. On October 21, 2013, comments to that report were filed by the Office of Consumer Advocate, TURN *et al.*, and CAUSE-PA. These reply comments address the various issues raised in those comments.

PECO's reply comments are organized in parallel with the issues discussed in the PECO Report. However, PECO will precede that discussion with a brief analysis of two suggestions made in the stakeholders' comments – (1) a suggestion by the OCA to overlay the Fixed Credit Option ("FCO") with budget billing, and a (2) suggestion by TURN *et al.* to refine the Percentage of Income Plan ("PIP") by enforcing a 125% usage limit. *Both of these suggestions are inconsistent with Commission conservation policy.*

1. The refinements suggested by the OCA and TURN are inconsistent with Commission conservation policy.

In their comments, the OCA and TURN *et al.* made suggestions of how to improve the FCO and PIP. The OCA suggests (p. 7) that the FCO could be improved by overlaying it with "budget billing."

TURN *et al.* suggest (p. 12) that the PIP could be made more conservation-friendly by enforcing a 125% usage limit.

PECO respectfully submits that both of these recommendations are inconsistent with the Commission policy to encourage conservation. The Commission's conservation policy is most strongly evinced in the Act 129 framework, which requires the collective customer base in each utility's service territory to reduce their usage from baseline for a number of consecutive years. One of the primary issues discussed throughout the instant litigation, and in PECO's Report, is whether each option is or is not consistent with that important overarching policy objective.

A. A Budget Billing FCO Would Eliminate Conservation Price Signals

The OCA suggests (p. 7) that further analysis of the FCO that incorporates "budget billing" should be done. The OCA's idea is that additional data on an FCO with budget billing would positively affect conclusions regarding the FCO's "breadth" of affordability.

PECO respectfully suggests that this change is contrary to Commission conservation policy. The OCA's testimony, brief, and comments regularly describe the FCO as being a superior program in part because it includes price signals for conservation. Putting a budget billing overlay on the FCO eliminates those price signals. Thus, adding a budget billing option to the FCO eliminates one of the primary positive elements of the FCO.

Briefly, in a normal FCO one determines the customer's baseline needs by examining the customer's prior year usage and price. The customer then receives a fixed credit each month and, *critically, if their usage increases compared to the prior year, the customer pays full (undiscounted) price for the additional usage.* This is the mechanism that, according to Mr. Colton, provides the customer with a conservation signal and which, according to Mr. Colton, makes the FCO a superior policy option.

With the budget billing overlay suggested by Mr.Colton, an FCO customer would receive a fixed budget bill every month – set at a budget of 1/12th of the prior year’s bill – and a fixed credit.¹ This would result in the customer paying a fixed amount each month regardless of usage. Simply, if the customer were to overuse service in a budget billing FCO, their bill would not increase because, in a budget billing FCO, the bill is not based on actual usage. Since increased usage would not result in an increased monthly bill, the conservation price signal would be eliminated.²

The OCA may be correct that the budget billing overlay would improve FCO affordability metrics in some situations³ – but it would do so at the cost of losing conservation price signals.

B. Using a 125% Usage Limit for the PIP, Without Other Price Signals, Is Not Consistent With Commission Conservation Policy

TURN et al. suggest (p. 12) that the PIP could be made more conservation-friendly by enforcing a 125% usage limit.

¹ PECO’s actual budget billing program is more complex than the program that Mr. Colton asks to have analyzed. In PECO’s program, a customer’s budget is readjusted three times per year to reflect the customer’s then-current trailing 12-month bills.

² PECO recognizes that, in a budget billing FCO, the customer would have a budget billing true-up in year two and thus would have ultimate responsibility, in year two of the program, to pay for any year one overuse. PECO is not aware of any research or data that suggests that residential CAP customers will alter their conservation behavior now based upon an accumulated or accrued liability that they will have to pay a year from now.

³ It seems likely that, *in the first year of operation*, a budget billing overlay would address some of the breadth of affordability issues for the FCO that are seen in PECO’s Report. Indeed, a budget billing FCO would deliver almost precisely the same benefits as a PIP in year one, and thus one would expect that, in the first year of operation, the FCO would have affordability equivalent to a PIP. However, budget billing FCO affordability would degrade significantly in subsequent years because any overuse or bad shopping decisions by the customer in year one would result in the accumulation of an “over-budget” amount, which the customer would remain responsible for in year 2 through a true-up of their budget billing amount. Thus, in year one the customer would have no price signals to assist in conservation and thus would be likely to overuse; in year two the customer would have to pay for the year one overuse, this ruining affordability in year two.

At the outset, it should be understood that the normal PIP provides no conservation price signals whatsoever, because the customer bill does not change with changes in usage. Even TURN's witness Dr. Peach frankly admitted that this is the case. TURN Statement No. 1, p. 17. In its reply comments, TURN offers (for the first time in this discussion⁴) that this weakness of the PIP program could be fixed by enforcing the 125% usage limit – that is, any customer who uses more than 125% of their prior year's usage would not receive CAP discounts on the usage in excess of 125%.

PECO recognizes that the 125% limit is embedded in the Commission's CAP Policy Statement, but respectfully suggests that using a 125% limit as the primary conservation protection, without other price signals, is inconsistent with current Commission conservation policy. Begin with the most obvious comparison – under Act 129, the customer base as a whole is expected to *decrease* its usage each year; in a PIP with a 125% usage limit, the policy statement would be that a customer would not need to receive conservation price signals until their usage had *increased* by 25% in a year.

The potential scope of this overuse is quite large. PECO's tiered program contains strong price signals for all usage above 650 kWh per month. Notwithstanding those strong price signals, when customers first enter PECO's CAP program, their usage tends to increase. Indeed, over the trailing three-year period, an average of nearly 25% of customers joining the CAP program exceeded the 125% limit. (PECO has tracked this metric, and reported it the Commission, for several years. A copy of PECO's last report is attached as Appendix A.) Since the PIP has far less price signals than the Status Quo, one should expect even less conservation behavior by CAP participants in a PIP. This means that, in a PIP, at least one quarter of the population should be expected to exceed the 125% usage limit. Again, it is obviously inconsistent with Commission conservation policy to craft a CAP program that,

⁴ In previous dockets involving PECO's CAP program, TURN took the position that PECO should NOT enforce the 125% usage limit. Indeed, TURN is a signatory to settlements in which the parties agreed, and the Commission approved, PECO's CAP program without enforcement of a 125% usage limit.

even with TURN's suggested improvement in place, is expected to have 25% of the population significantly increasing their annual usage.⁵

In sum, the improvements offered by the OCA and TURN are both inconsistent with Commission conservation policy.

2. Issues Discussed in PECO's Report

A. IT Transition Costs and Change Management Costs

In PECO's Report, it stated that the PIP and FCO would cause between \$6.8-\$11.4 million of IT transition costs. PECO also stated that the PIP and FCO would cause about \$800,000 in change management costs.

TURN *et al.* did not challenge this estimate (their own witness, Dr. Peach, estimated the IT transition costs would be as high as \$5 million) but did not make several other comments (pp. 3-5) about IT transition costs.

First, TURN notes that PECO's estimates of IT costs have evolved over the course of this investigation. That is correct. In the fall of 2012, the Commission issued its Tentative Order and allowed 20 days for comments; PECO provided its initial high level estimate of \$4.5-\$6 million. By February 2013, PECO had the opportunity to do several months of IT scoping work and then estimated the potential range of costs as \$7.4 to \$12.8 million. It has since had six additional months to do detailed IT

⁵ Moreover, imposing this limitation would destroy PIP affordability. By definition, a PIP provides affordable service only if the delivered bills are based completely on a percentage of income. For those customers who exceed the 125% usage limit, those customers would receive bills with additional charges for their use in excess of 125%. And, since that is expected to be 25% of the population, that means that this refinement would cause an additional 25% of the PIP population to receive unaffordable bills.

scoping work, and has been able to reduce its estimate to \$6.8 - \$11.4 million. There is nothing unusual about that estimating sequence.

Second, TURN asserts -- without any evidence -- that PECO incurred IT costs in the past when it created its CAP program (or when it shifted from a PIP pilot to CAP tiers) -- thus implying that IT costs are not an impediment to change. PECO simply notes that it has never moved from one mature CAP program to another, so it has never incurred this type of IT costs before.

Third, TURN asserts that, because the FCO is a more complex form of PIP, the IT costs of an FCO would "rationally" be more than the IT costs for moving to a PIP. This is true to a minor degree. Most of the IT costs of moving to a PIP have to do with unwinding the CAP tier discount code that is entwined throughout PECO's existing coding. That task has to be done for both the PIP and the FCO. While there may be some small incremental IT costs for the FCO, PECO does not believe they are a material difference in the context of a \$6.8 - \$11.4 million expenditure.

For its part, the OCA primarily notes (pp. 18-19) that IT transition costs (and change management costs) are one-time costs, and need to be weighed against the potential ongoing benefits of moving to an FCO. (Similarly, TURN suggests that PECO will have ongoing cost savings in arrearage forgiveness that would, over time, offset the IT costs of moving to a PIP.)

The comparison of one-time costs vs. ongoing benefits is obviously one important aspect of the analysis, but in making that comparison it is important to remember that the costs are certain to be incurred, while it is not at all certain that the benefits will accrue. Simply, the shortfall cost benefits of a PIP (or an FCO with budget billing) depend upon generation pricing remaining the same, and customer usage remaining the same. If generation prices go up, or if customer usage goes up, the cost of the PIP, or of an FCO with budget billing, increase significantly. For example, in the testimony of Ms. Feldhake, PECO Statement No. 1, p. 4, PECO demonstrated that if generation prices increase by 30%, then the PIP

shortfall costs increase by \$21.4 million, while PECO's Status Quo program costs increase by only \$8 million – a difference of \$13.4 million. Thus, any cost-benefit analysis must recognize that *the PIP may actually cost more than the Status Quo*, if generation pricing or overall usage increases.

It also should be remembered that a single transition cost can be so large, and so disruptive, that it dominates a multi-year stream of potential benefits. That is the case here. As discussed in the testimony of Ms. Feldhake, PECO Statement No. 1, pp. 11-12, PECO's annual IT capital budget for 2013 is \$11.5 million. That means that this single IT project would more than double the size of PECO's annual capital IT effort. This would have a ripple, disruptive effect on PECO's ability to conduct other IT capital projects. Simply, the initial reprogramming effort is so large and disruptive that it should not be undertaken without compelling evidence that ongoing benefits will justify the disruption. And PECO's Report shows that, taking into consideration all of the various factors and cost savings, there is no clear warrant to move to another program.

B. Shortfall

The "shortfall" refers to the cost of providing CAP discounts in each of the program options. In PECO's Report, it provided data on the shortfall for each program on a snapshot basis, using current generation pricing, and for two sensitivity scenarios dealing with increased usage and poor shopping decisions.

There were no significant challenges to PECO's data on shortfall.⁶ However, it is noteworthy that TURN *et al.* strongly suggested that, if an option causes an increase of \$9 million shortfall over the

⁶ The OCA inquired (p. 3) how the FCO could show a \$200,000 increase in shortfall in the "bad shopping" scenario. PECO asked its independent evaluator, APPRISE, why this occurred. APPRISE responded that:

When energy costs increase, this is what happens under the three scenarios and why the shortfall costs do not increase as much under the fixed credit:

Status Quo, it should be rejected on that basis, stating that: “Since the Commission has directed PECO only to consider CAP designs that do not place more of financial burden on non-participants, the 7-tier R/S/SD approach [which has a \$9 million shortfall increase over the Status Quo at current generation pricing] **should be soundly rejected.**”

PECO respectfully submits that this same decision rule should be applied to the PIP, which TURN advocates. And, while the PIP has equivalent shortfall to the Status Quo **at current generation pricing**, it should be recalled that in the spring litigation PECO presented information on the shortfalls that would be expected in each program **if generation pricing increases**. . As noted previously, in the testimony of Ms. Feldhake, PECO Statement No. 1, p. 4, PECO demonstrated that if generation prices increase by 30%, then the PIP shortfall costs increase by \$21.4 million, while PECO’s Status Quo program costs increase by only \$8 million – a difference of \$13.4 million.

As discussed in PECO’s brief, pp. 8-11, in 2011 generation pricing in the PECO service territory in fact was 30% more than now. Consequently, there is a real risk – agreed to by even Dr. Peach, see PECO Brief, p. 10 – that generation prices will rise and make the PIP more expensive. Thus, using TURN’s own decision rule, if one believes that generation prices will return to 2011 levels, the PIP should be rejected

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- CAP Discount – the discount increases because it is the fixed percentage of costs up to a maximum usage. When the energy costs increase, the shortfall increases.
 - PIPP – the subsidy increases, because the customer continues to pay the fixed percentage of income so the difference between what the customer pays and the actual bill is greater
 - Fixed Credit – the subsidy remains the same because the subsidy is calculated at the time of the lower cost and is not adjusted until the following year. The only reason it goes up somewhat is because some customers who previously had the fixed credit reduced or eliminated to make them pay the minimum bill will not have the fixed credit reduced or eliminated now because given the higher cost, they will now have the minimum bill with the fixed credit.

as too costly because, if generation pricing or customer usage increase, the PIP could easily be substantially more costly than the Status Quo.

C. Affordability (Unaffordability)

PECO's Report also contains detailed discussion of the affordability/unaffordability of each of the program options.

The OCA's primary concern with PECO's analysis, expressed at pages 9-12 of its comments, is that it believes PECO should have analyzed the FCO with budget billing and seasonality adjustments. The OCA projects that the FCO affordability data would improve with such an analysis.

PECO addressed the budget billing FCO at length in the first section of these comments, showing that it is inconsistent with Commission conservation policy and that it would degrade affordability in year two.

As to seasonality, PECO agrees with the OCA that the FCO program is quite vulnerable to seasonally-driven changes in use of electric service. In its standard form, an FCO analysis reviews the prior year's usage to determine a "fixed credit" amount, which is then divided by 12 and used as the standard credit each month. (That is the "fixed" aspect of the "fixed credit option.") If inclement weather causes actual usage in the program year to be higher than it was in the base year, then the FCO will deliver unaffordable bills; if the weather is milder, then the FCO delivers over-compensatory benefits because the benefit is "fixed" – it does not vary with seasonality.

The potential effect on the FCO is quite high. As shown in the data in Appendix B, in the past several years PECO has seen year-over-year seasonal usage variations in excess of 10% in some seasons. (This effect was not reflected in PECO's previous analysis of FCO affordability. This means that, unless

there is some method for correcting the FCO to respond to seasonality, it may deliver either a higher level of unaffordable bills, or a higher level of over-compensation, than reflected in the PECO report.)

However, PECO did not analyze an FCO with a seasonality “fix” because it frankly does not know how to build or model such a system. An FCO requires one to review the 12-month trailing usage and price history of each of the 140,000+ CAP customers in order to set a customer-specific “fixed” credit for the year. At a minimum, a seasonal adjustment would mean replicating two or three additional times each year, and then changing the credit being flowed to each customer several times a year. And the “fixed” nature of the credit would be lost, because the credit would change multiple times each year.⁷ PECO has not been able to determine a method to even model this option, much less implement it.⁸

TURN’s comments on affordability (pp. 6-10) primarily focus on demonstrating deficits of the FCO. Because is not an advocate of the FCO, and therefore PECO will defer to OCA to reply to those comments.

In this section, TURN also continues its long-standing support of the PIP program. PECO notes that, in its Brief, it identified the reasons that a PIP should not be adopted. PECO does not repeat that analysis here, but relies upon its prior extensive statement of reasons in support of that conclusion.

⁷ PECO has the same concerns with the OCA’s proposal (p. 5) to adjust the FCO benefits to reflect changes in PECO’s price-to-compare (“PTC”). PECO’s PTC is adjusted four times per year; if the FCO benefits must be adjusted each time that occurs, PECO would need to calculate, communicate, and revised its billing for new, individualized benefits for 140,000+ CAP customers four times a year – a total of over 560,000 such individualized transactions each year. Similarly, since PECO’s actual budget billing program adjusts each customer’s budget three times a year, an FCO with a budget billing overlay would require over 420,000 annual individualized transactions.

⁸ This implementation concern is compounded when one attempts to analyze how to simultaneously implement budget billing and seasonality, as suggested by Mr. Colton. Budget billing is designed to levelize bills over a period of time so that the payment can be the same each month regardless of usage; seasonality is intended to de-levelize bills over a period of time so that some of the billing components track the seasons and change over time.

On page 8 of TURN's comments, it quotes a portion of a paragraph from PECO's Six-Year Evaluation indicating that the only way to achieve full affordability is a PIP with no minimum bill. PECO notes that a "PIP with no minimum bill" is not being advocated by any party to this proceeding. PECO also notes that the 125+ page evaluation contains numerous statements favorable to the Status Quo – including listing as a "Success" on page viii "Usage limits on CAP discounts to encourage conservation," which is an element that the PIP cannot match. More importantly, in the Recommendation section, the evaluation does NOT conclude that PECO should move to a PIP.

CAUSE-PA's comments are dominated by the idea that PECO must move to a PIP because, it claims, the law requires PECO to move to an affordable program and a PIP is the only method of achieving complete affordability, with CAUSE-PA stating (p. 6) that PECO's decision to support its Status Quo is "quite puzzling." CAUSE-PA also suggests that PECO has not provided "substantial justification for the continuation of this [claimed] deviation" from the Commission's affordability guidelines.

PECO respectfully disagrees with the view of CAUSE-PA. The basic difference of opinion is that CAUSE-PA appears to believe that affordability is the *only* metric that should be used to evaluate CAP options, while PECO believes that there are numerous factors – all set out at length in its testimony, brief, and the PECO Report – that must be evaluated in order to determine the proper CAP program. Moreover, the Public Utility Code and the Commission's regulations are replete with references to the other factors that must be considered in making this decision – to give but one example, the Three-Year Plan that is under discussion here is statutorily referred to as a "universal service and energy conservation" program. See 66 Pa. C.S. §2803 (definitions). It is those other factors, as detailed in PECO's Report, that provide the substantial justification for remaining with the Status Quo notwithstanding that the Status Quo has some challenges on affordability.

D. Customers Who Receive No Discount

In its report, PECO noted that if it adopts a PIP or FCO, then approximately 40,000 CAP families who are currently receiving benefits will lose those benefits. The sum total of the lost benefits will be approximately \$9 million. See data provided in Appendix C.

TURN does not appear to find this troubling, simply noting (p. 10) that CAP customers may receive other benefits even if their discount benefits are stripped from them. It may be true that other benefits will continue to flow, but it is also true that this population of 40,000 customers will lose benefits cumulatively worth \$9 million.

The OCA also suggests that other, non-discount benefits will continue to flow, and suggests that, if the Commission is concerned about a loss of benefits to this group, it could provide a nominal \$5 per month benefit to the group at an annual cost of \$2.6 million.

PECO cannot join in the view that the loss of \$9 million of benefits to very poor customers is a matter of no consequence—even if those customers do continue to get other benefits. As to the OCA's suggestion that the Commission provide a nominal benefit of \$5 per month, PECO respectfully submits that that will still leave these 40,000 customers, collectively, with a shortfall of \$7.4 million per year compared to their current benefits.

The mechanism of the PIP and the FCO is to strip benefits from some customers at the D and E tiers, and give those benefits to poorer customers at tiers A, B, and C. TURN frankly admits this at page 6 of its comments. (“Costs offsets from eliminating over-subsidies allow a PIP to direct funds to CAP customers who were under-subsidized”) If one attempts to give the benefit back to those customers, as Mr. Colton suggests, then the dollars are no longer available to fund discounts to the “under-subsidized” customers. Ultimately, the PIP and FCO are mechanisms to shift existing CAP

benefits from one group of customers to another. PECO respectfully submits that, in deciding whether that is a good idea, one should keep a focus on the 40,000 families who will lose their existing \$9 million of benefits. Because if you don't take those funds away from the 40,000, there is nothing to redistribute via the PIP or FCO mechanism.

E. Bad Debt Expense and Terminations

In its report, PECO set forth its position that the PIP and FCO would increase bad debt expense and terminations. The basic mechanism by which this happens is that the PIP and FCO purposefully take benefits away from 40,000 CAP D and E customers and give it, in much larger chunks, to a much smaller population of CAP A, B, and C customers. One sees improvement in bad debt expense and terminations of the smaller group of A,B and C customers, but sees degradation of bad expense and terminations for the 40,000 D and E customers. PECO calculates that this phenomenon results in a net increase in bad debt expense and terminations under the PIP and FCO.

The OCA suggests (p.15) that there will be no increase in bad debt or terminations because the 40,000 customers, even though they will have \$9 million in benefits stripped from them, will still receive "affordable" bills and thus the OCA expects that they will all pay their bills. PECO respectfully notes that that is not the behavior one typically sees from CAP customers. The data presented in Appendix D show that, even for CAP customers who receive affordable bills, there is a fairly high non-payment level.

TURN et al. relies (pp. 11-12) upon the Commission's conclusion, in the Order, that PECO's estimates on these issues "are not derived from any robust quantitative analysis, but rather were built on a host of assumptions the basis for which is completely unknown." PECO respectfully suggests, to both the Commission and TURN, that this characterization does not accurately reflect the state of the evidentiary record in this proceeding. PECO previously provided, as Exhibit LF-1 to Ms. Feldhake's testimony, a detailed explanation of the data underlying this analysis and specifically stating all

assumptions used in the analysis. One can certainly disagree with, or suggest revisions to, those assumptions. But to state those assumptions are “completely unknown” is simply inappropriate. Exhibit LF-1 is attached to these Reply Comments as Appendix E.

F. Usage and Price Signals

PECO largely addressed the parties’ comments on this issues in the first section of these reply comments. PECO reiterates that the suggested refinements to the FCO and the PIP are not consistent with Commission conservation policy.

PECO does, however, wish to comment on the implication of some of the Comments that, even without conservation price signals, PECO’s low-income customers have other tools such as weatherization and LIURP that will allow them to conserve energy. *See for example*, TURN Comments, p. 12. Throughout this proceeding and for years prior to this proceeding, TURN and CAUSE-PA have argued that those programs are fatally under-funded. It is not clear that the weatherization and LIURP programs can actually achieve all that TURN suggests, but setting that aside for a moment, TURN’s Comments should be viewed with its historic position in mind. TURN is essentially saying that one can solve the problems of a PIP (no price conservation signals) with weatherization programs *if one substantially increases funding to those programs*. That means that the PIP, in order to be a fully functional program that will achieve both affordability and conservation, will have to be accompanied by substantial increases in weatherization and LIURP funds.

G. Other

TURN suggests (p. 14) that PECO should respond to OCA Comments that were filed on May 2013. PECO was not previously aware that these Comments had been filed. PECO is now reviewing the OCA’s Comments, and will respond to them next week (that is, the week of November 4, 2013).

3. Conclusion

For the reasons set forth above, PECO continues to conclude that no alternative delivery mechanism has been shown to be superior to the Status Quo across the broad array of issues reviewed. PECO therefore continues to support its Status Quo program.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ward Smith", is written over a horizontal line.

Ward Smith

Counsel for PECO Energy Company

Appendix A

PECO's Fourth Annual Report on CAP Customer Consumption and Credits

June 27, 2013



An Exelon Company

Richard G. Webster, Jr.
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Regulatory Policy and Strategy

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June 27, 2013

Dear Colleagues:

Pursuant to PECO Energy Company's ("PECO") DSP Settlement in Docket Number P-2008-206739 and Gas Rate Case Settlement in Docket Number R-2008-2028394, enclosed please find PECO's fourth annual report on Customer Assistance Program ("CAP") customer consumption and credits.

This is the third annual report which contains full year data therefore PECO's Regulatory obligation has been completed.

If you have questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Dick".

cc: Ward Smith
Lauren Feldhake
Patricia King

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CAP Usage Tracking Program and CAP Credit Analysis

June 27, 2013

Regulatory Requirements

2

*For the first two years of a customer's initial participation in its gas (and electric) CAP program, PECO will monitor the new CAP participant's consumption to determine whether CAP customers are maintaining annual usage at or below 125% of historical average usage, adjusted for weather. PECO will also track data on the population of new (gas) CAP participants to determine the average CAP credit and distribution of CAP credits actually provided across the new CAP customer population. PECO's findings regarding CAP consumption and CAP credit will be reported by June 30th of each year to OCA and OTS. PECO will conduct this data collection and reporting for three years after implementation of its new gas CAP Rates.

** Per the PECO Gas Rate Case Settlement and the Electric DSP Settlement*



An Exelon Company

Electric Report

Weather Adjusted

CAP Enroll Month	Period Usage Tracked	Num CAP Participants Analyzed	Num of CAP Participants whose post-enrollment usage exceeds 125% of their pre-CAP usage	Num of CAP Participants above threshold as a percent of total
200909	June 2012 to May 2013	166	59	36%
200910	June 2012 to May 2013	312	107	34%
200911	June 2012 to May 2013	368	121	33%
200912	June 2012 to May 2013	373	114	31%
201001	June 2012 to May 2013	416	118	28%
201002	June 2012 to May 2013	406	124	31%
201003	June 2012 to May 2013	381	116	30%
201004	June 2012 to May 2013	330	97	29%
201005	June 2012 to May 2013	1018	285	28%
201006	June 2012 to May 2013	930	280	30%
201007	June 2012 to May 2013	462	137	30%
201008	June 2012 to May 2013	477	142	30%
201009	June 2012 to May 2013	531	137	26%
201010	June 2012 to May 2013	495	107	22%
201011	June 2012 to May 2013	511	127	25%
201012	June 2012 to May 2013	742	162	22%
201101	June 2012 to May 2013	379	79	21%
201102	June 2012 to May 2013	667	144	22%
201103	June 2012 to May 2013	350	63	18%
201104	June 2012 to May 2013	299	63	21%
201105	June 2012 to May 2013	355	73	21%
201106	June 2012 to May 2013	359	76	21%
201107	June 2012 to May 2013	345	66	19%
201108	June 2012 to May 2013	367	57	16%
201109	June 2012 to May 2013	419	65	16%
201110	June 2012 to May 2013	437	75	17%
201111	June 2012 to May 2013	469	64	14%
201112	June 2012 to May 2013	456	72	16%
201201	June 2012 to May 2013	415	52	13%
201202	June 2012 to May 2013	511	54	11%
201203	June 2012 to May 2013	375	38	10%
201204	June 2012 to May 2013	347	37	11%
201205	June 2012 to May 2013	392	43	11%
201206	June 2012 to May 2013	388	43	11%



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Gas Report

Weather Adjusted

CAP Enroll Month	Period Usage Tracked	Num CAP Participants Analyzed	Num of CAP Participants whose post-enrollment usage exceeds 125% of their pre-CAP usage	Num of CAP Participants above threshold as a percent of total
200909	June 2012 to May 2013	44	11	25%
200910	June 2012 to May 2013	61	18	30%
200911	June 2012 to May 2013	61	11	18%
200912	June 2012 to May 2013	59	10	17%
201001	June 2012 to May 2013	150	30	20%
201002	June 2012 to May 2013	95	19	20%
201003	June 2012 to May 2013	110	29	26%
201004	June 2012 to May 2013	102	19	19%
201005	June 2012 to May 2013	640	94	15%
201006	June 2012 to May 2013	120	19	16%
201007	June 2012 to May 2013	69	13	19%
201008	June 2012 to May 2013	92	10	11%
201009	June 2012 to May 2013	84	17	20%
201010	June 2012 to May 2013	78	16	21%
201011	June 2012 to May 2013	124	21	17%
201012	June 2012 to May 2013	142	31	22%
201101	June 2012 to May 2013	59	6	10%
201102	June 2012 to May 2013	75	9	12%
201103	June 2012 to May 2013	67	6	9%
201104	June 2012 to May 2013	67	16	24%
201105	June 2012 to May 2013	82	6	7%
201106	June 2012 to May 2013	51	7	14%
201107	June 2012 to May 2013	51	5	10%
201108	June 2012 to May 2013	63	5	8%
201109	June 2012 to May 2013	63	12	19%
201110	June 2012 to May 2013	63	7	11%
201111	June 2012 to May 2013	59	5	8%
201112	June 2012 to May 2013	42	7	17%
201201	June 2012 to May 2013	115	9	8%
201202	June 2012 to May 2013	126	7	6%
201203	June 2012 to May 2013	87	6	7%
201204	June 2012 to May 2013	86	2	2%
201205	June 2012 to May 2013	73	3	4%
201206	June 2012 to May 2013	102	6	6%



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Average Gas CAP Credit (Shortfall) by Tier

CAP Enroll Month	Bill Period	Num of Customers	CAP Tier							
			A	B	C	D	D1	E	E1	
200909	June 2012 to May 2013	163		\$ 390.57	\$ 362.57	\$ 154.07	\$ 174.59	\$ 110.08	\$ 101.71	
200910	June 2012 to May 2013	188		\$ 392.12	\$ 435.68	\$ 211.86	\$ 111.53	\$ 152.65	\$ 181.93	
200911	June 2012 to May 2013	186		\$ 581.41	\$ 286.56	\$ 215.37	\$ 255.11	\$ 217.72	\$ 199.52	
200912	June 2012 to May 2013	187		\$ 472.96	\$ 473.13	\$ 180.87	\$ 119.27	\$ 174.06	\$ 178.90	
201001	June 2012 to May 2013	327		\$ 359.76	\$ 450.45	\$ 202.81	\$ 152.67	\$ 128.44	\$ 127.63	
201002	June 2012 to May 2013	262	\$ 72.11	\$ 399.95	\$ 513.58	\$ 265.72	\$ 179.03	\$ 235.02	\$ 109.08	
201003	June 2012 to May 2013	289		\$ 352.16	\$ 449.93	\$ 241.57	\$ 152.89	\$ 349.76	\$ 356.88	
201004	June 2012 to May 2013	322		\$ 268.30	\$ 565.32	\$ 370.91	\$ 149.85	\$ 143.35	\$ 198.51	
201005	June 2012 to May 2013	1150		\$ 380.02	\$ 352.14	\$ 203.29	\$ 82.55	\$ 154.51	\$ 204.98	
201006	June 2012 to May 2013	363		\$ 375.83	\$ 246.44	\$ 182.31	\$ 195.19	\$ 166.52	\$ 126.77	
201007	June 2012 to May 2013	256		\$ 319.71	\$ 161.75	\$ 115.46	\$ 91.42	\$ 242.50	\$ 327.62	
201008	June 2012 to May 2013	289		\$ 236.15	\$ 239.90	\$ 98.87	\$ 60.82	\$ 290.49	\$ 166.47	
201009	June 2012 to May 2013	254		\$ 292.29	\$ 242.56	\$ 177.54	\$ 58.93	\$ 262.88	\$ 246.78	
201010	June 2012 to May 2013	219		\$ 298.68	\$ 322.19	\$ 115.70	\$ 52.59	\$ 102.44	\$ 198.51	
201011	June 2012 to May 2013	327		\$ 335.29	\$ 401.46	\$ 183.85	\$ 65.47	\$ 218.62	\$ 143.83	
201012	June 2012 to May 2013	423		\$ 211.40	\$ 206.21	\$ 204.50	\$ 51.87	\$ 159.86	\$ 45.47	
201101	June 2012 to May 2013	230		\$ 379.38	\$ 411.32	\$ 109.07	\$ 54.70	\$ 238.86	\$ 199.84	
201102	June 2012 to May 2013	276		\$ 517.26	\$ 429.90	\$ 188.94	\$ 93.68	\$ 256.68	\$ 283.30	
201103	June 2012 to May 2013	255		\$ 443.97	\$ 497.93	\$ 180.18	\$ 69.18	\$ 51.80	\$ 113.64	
201104	June 2012 to May 2013	236		\$ 709.55	\$ 485.06	\$ 184.13	\$ 82.81	\$ 112.69	\$ 133.24	
201105	June 2012 to May 2013	276		\$ 521.53	\$ 560.31	\$ 208.23	\$ 88.33	\$ 239.69	\$ 132.61	
201106	June 2012 to May 2013	227		\$ 504.38	\$ 465.18	\$ 167.93	\$ 73.01	\$ 98.14	\$ 79.32	
201107	June 2012 to May 2013	195		\$ 571.37	\$ 473.32	\$ 191.36	\$ 61.12	\$ 107.81	\$ 114.52	
201108	June 2012 to May 2013	232		\$ 496.92	\$ 428.75	\$ 140.72	\$ 62.82	\$ 348.58	\$ 2.20	
201109	June 2012 to May 2013	231		\$ 475.97	\$ 543.51	\$ 167.14	\$ 107.55	\$ 141.05	\$ 119.74	
201110	June 2012 to May 2013	237		\$ 574.71	\$ 444.30	\$ 199.05	\$ 70.47	\$ 234.28	\$ 30.98	
201111	June 2012 to May 2013	227		\$ 415.11	\$ 421.44	\$ 170.57	\$ 87.42	\$ 23.25	\$ 211.42	
201112	June 2012 to May 2013	217		\$ 628.64	\$ 398.46	\$ 188.68	\$ 80.05	\$ 175.32		
201201	June 2012 to May 2013	331		\$ 560.05	\$ 532.35	\$ 157.59	\$ 79.27	\$ 109.34	\$ 106.21	
201202	June 2012 to May 2013	340		\$ 565.01	\$ 331.33	\$ 187.30	\$ 59.44	\$ 72.80	\$ 175.57	
201203	June 2012 to May 2013	316		\$ 723.45	\$ 517.83	\$ 156.65	\$ 105.45	\$ 37.05	\$ 250.84	
201204	June 2012 to May 2013	306		\$ 583.12	\$ 548.24	\$ 295.42	\$ 55.37	\$ 56.46	\$ 30.69	
201205	June 2012 to May 2013	299	\$ 489.54	\$ 529.72	\$ 541.71	\$ 168.02	\$ 67.01	\$ 394.65	\$ 219.49	
201206	June 2012 to May 2013	315		\$ 703.96	\$ 594.49	\$ 283.72	\$ 87.66	\$ 230.98	\$ 532.52	

•The current maximum benefit for CAP Gas customers is \$946

•The CAP Tier represents the Tier assigned to customer at the time of CAP enrollment



Appendix B
Seasonal Usage Variations

**PECO Energy CAP Redesign
Docket No. M-2012-2290911
Seasonal Usage Variation**

	3 Yr Monthly Average (kWhs)	Highest Yr Monthly Average (kWhs)	Lowest Yr Monthly Average (kWhs)
Rate R Customers	714	765	664
Difference		7.1%	-7.0%
Rate RH Customers	1372	1386	1363
Difference		1.0%	-0.7%

	3 Yr Winter Months Average (kWhs)	Highest Yr Winter Months Average (kWhs)	Lowest Yr Winter Months Average (kWhs)
Rate R Customers	635	673	614
Difference		6.0%	-3.3%
Rate RH Customers	1535	1562	1519
Difference		1.8%	-1.0%

	3 Yr Summer Months Average (kWhs)	Highest Yr Summer Months Average (kWhs)	Lowest Yr Summer Months Average (kWhs)
Rate R Customers	873	948	764
Difference		8.6%	-12.5%
Rate RH Customers	1047	1110	981
Difference		6.0%	-6.3%

Appendix C

Value of Benefits Taken From the 40,000

PECO Energy CAP Redesign

Docket No. M-2012-2290911

Discounts Lost Under PIP and FCO Scenarios

Original PIP - \$12 Minimum Monthly Payment

CAP Tiers	# of Customers	Poverty Level	Discount	Usage Limit			Customers Not Receiving PIPP Subsidy			Total Discount
				Winter	Summer	Summer	# of Customers	% of Customers	Mean Discount under CAP	
				Oct - May	June	Jul - Sept				
B	9,809	<=25%	92%	650	650	750	49	<1%	\$7	\$343
C	17,462	26% - 50%	84%	650	650	750	175	1%	\$190	\$33,177
D	25,261	51% - 75%	68%	650	650	650	2,273	9%	\$360	\$818,456
DI	33,313	76% - 100%	61%	650	650	650	7,329	22%	\$378	\$2,770,309
E	23,056	101% - 125%	37%	650	650	650	13,142	57%	\$297	\$3,903,150
E1	18,478	126% - 150%	21%	650	650	650	13,674	74%	\$177	\$2,420,248
Total	127,378	Total					36,642	27%	\$275	\$9,945,685

Original PIP - \$30 Minimum Monthly Payment

CAP Tiers	# of Customers	Poverty Level	Discount	Usage Limit				Customers Not Receiving PIPP Subsidy			Total Discount
				Winter	Winter	Summer	Summer	# of Customers	% of Customers	Mean Discount under CAP	
				Nov - Apr	Oct, May	June	Jul-Sept				
B	975	<=25%	86%	1500	650	650	750	10	1%	\$27	\$263
C	1,531	26% - 50%	73%	1500	650	650	750	107	7%	\$422	\$45,221
D	2,275	51% - 75%	39%	1500	650	650	650	1,138	50%	\$390	\$443,625
DI	3,360	76% - 100%	22%	1500	650	650	650	2,486	74%	\$218	\$542,035
E	2,382	101% - 125%	0%	1500	650	650	650	2,120	89%	\$0	\$0
E1	2,288	126% - 150%	0%	1500	650	650	650	2,196	96%	\$0	\$0
Total	12,811	Total						8,057	61%	\$134	\$1,031,144

Fixed FCO - \$12 Minimum Monthly Payment

CAP Tiers	# of Customers	Poverty Level	Discount	Usage Limit			Customers Not Receiving PIPP Subsidy			Total Discount
				Winter	Summer	Summer	# of Customers	% of Customers	Mean Discount under CAP	
				Oct - May	June	Jul - Sept				
B	9,809	<=25%	92%	650	650	750	49	<1%	\$10	\$490
C	17,462	26% - 50%	84%	650	650	750	175	1%	\$190	\$33,177
D	25,261	51% - 75%	68%	650	650	650	2,273	9%	\$360	\$818,456
DI	33,313	76% - 100%	61%	650	650	650	7,329	22%	\$378	\$2,770,309
E	23,056	101% - 125%	37%	650	650	650	13,142	57%	\$297	\$3,903,150
E1	18,478	126% - 150%	21%	650	650	650	13,674	74%	\$177	\$2,420,248
Total	127,378	Total					36,642	27%	\$275	\$9,945,832

Fixed FCO - \$30 Minimum Monthly Payment

CAP Tiers	# of Customers	Poverty Level	Discount	Usage Limit				Customers Not Receiving PIPP Subsidy			Total Discount
				Winter	Winter	Summer	Summer	# of Customers	% of Customers	Mean Discount under CAP	
				Nov - Apr	Oct, May	June	Jul-Sept				
B	975	<=25%	86%	1500	650	650	750	10	1%	\$43	\$419
C	1,531	26% - 50%	73%	1500	650	650	750	107	7%	\$422	\$45,221
D	2,275	51% - 75%	39%	1500	650	650	650	1,138	50%	\$390	\$443,625
DI	3,360	76% - 100%	22%	1500	650	650	650	2,486	74%	\$218	\$542,035
E	2,382	101% - 125%	0%	1500	650	650	650	2,120	89%	\$0	\$0
E1	2,288	126% - 150%	0%	1500	650	650	650	2,196	96%	\$0	\$0
Total	12,811	Total						8,057	61%	\$134	\$1,031,300

Appendix D

Collection Activity, Affordable vs. Unaffordable

Status of Collection Activity
CAP Customers Who Receive Affordable Bills vs. CAP Customers Who Receive Unaffordable Bills

	Affordable	% aff	Unaffordable	% unaff
# accounts	73,173		38,597	
Collection status - End of 2012				
Low risk segment (1-4)	47,534	65%	18,748	49%
High risk segment (5-8)	25,518	35%	19,830	51%
No risk segment	121	0%	19	0%
# not in collections	57,290	78%	26,829	70%
# active collections	15,883	22%	11,768	30%
\$ Not in collections	\$ 10,795,665	52%	\$ 11,283,210	47%
\$ Active collections	\$ 9,923,707	48%	\$ 12,687,391	53%
Total	\$ 20,719,372		\$ 23,970,601	

Appendix E

Exhibit LF-1

Data and Assumptions Supporting Termination Analysis

Exhibit LF-1

Methodology for Determining Change in Terminations

Over the last 3 years, the average Low Income terminations were approximately 16,000 (true average 15,993) allocated across the tiers as follows:

	3-Year Termination Average
CAP A	6
CAP B	1,359
CAP C	2,523
CAP D	6,466
CAP E	5,639

In general, when the amount of discount and shortfall to a population increases, PECO expects delinquencies to fall and terminations to decrease. The reverse is also true; if the amount of discount and shortfall decreases, PECO expects delinquencies to grow and terminations to increase.

We thus began our termination analysis by calculating the change in shortfall in each scenario by CAP tier (results shown in table below).

Tier	12 Tier		12 Tier w/Seasonality		PIP		PIP w/Cost Contain		
	Existing Shortfall	Chg Shortfall \$	Shortfall Chg %	Chg Shortfall \$	Shortfall Chg %	Chg Shortfall \$	Shortfall Chg %	Chg Shortfall \$	Shortfall Chg
A/B	9,909,550	\$ (114,468)	-1.2%	\$ 448,925	4.5%	\$ 3,932,805	39.7%	\$ (1,691,476)	-17.07%

C	17,569,775	\$ (202,953)	-1.2%	\$ 730,859	4.2%	\$ 3,673,866	20.9%	\$ (3,970,949)	-22.60%
D	38,994,734	\$ (450,439)	-1.2%	\$ 1,704,885	4.4%	\$ (3,402,698)	-8.7%	\$ (12,358,747)	-31.69%
E	11,439,483	\$ (132,141)	-1.2%	\$ 800,859	7.0%	\$ (3,149,430)	-27.5%	\$ (5,044,475)	-44.10%
	77,913,542	\$ (900,000)	1.2%	\$ 3,685,527	4.7%	\$ 1,054,543	1.4%	\$ (23,065,647)	-29.60%

We then multiplied, for each tier, the number of existing terminations in that tier by that tiers percentage change in shortfall. That gave us the following results.

Tier	Existing Terminations	12 Tier		12 Tier w/Seasonality		PIP		PIP w/Cost Contain	
		Shortfall Chg %		Shortfall Chg %		Shortfall Chg %		Shortfall Chg %	
AB	1,365	-1.2%	16	4.5%	(62)	39.7%	(539)	-17.07%	232
C	2,523	-1.2%	29	4.2%	(105)	20.9%	(528)	-22.60%	570
D	6,466	-1.2%	75	4.4%	(283)	-8.7%	564	-31.69%	2049
E	5,639	-1.2%	65	7.0%	(395)	-27.5%	1552	-44.10%	2487
	15,993	1.2%	185	4.7%	(844)	1.4%	1050	-29.60%	5338

For three of the scenarios – 12 Tier, 12-Tier with Seasonality, and PIP w/Cost Containment – the change in shortfall for that scenario is in the same direction in all tiers (either an increase or a decrease across all tiers). For those scenarios, therefore, we had clear directionality on whether the cumulative shortfall would increase or decrease terminations, since the effect and direction is the same for each component tier. Moreover, in those scenarios the percentages tend to be fairly evenly distributed across tiers, so we felt that little additional analysis was necessary for these tiers. The primary additional adjustment was for PIP with cost containment, because my sense was that the 5338 value was probably an overstatement of the negative effect of a PIP with cost containment, so I reduced that estimate to a range of 3000-45000.

For the PIP scenario, I felt that the analysis needed further refinement, for several reasons. In the B tier, we currently have a high level of unaffordability and a PIP should theoretically make the affordability level quite high. It therefore seemed to me that we should be observing a larger reduction in CAP B terminations under a PIP. Similarly, our prior analysis had shown that 45,000 CAP D and E families would have zero discounts under a PIP. It also did not seem plausible to me that would only result in a net change of 2000 additional terminations for those tiers. In addition, because this was the only scenario in which the discount direction differed from tier-to-tier, I felt additional analysis was needed. We therefore looked at an additional layer of data detail. In a PIP, we calculate that 31,084 CAP E customers would receive no discount, and that 13,429 CAP D customers would receive no discount. We also estimate that the benefits that flow to the lower tiers would go to 12,938 CAP A/B customers and 14,062 CAP C customers – in both cases, approximately 90% of the existing population will receive some new level of benefit in the PIP. I therefore made the assumption that 90% of the terminations in those tiers would be eliminated under a PIP. On the flip side, the 45,000 customers who will receive no benefits constitute approximately 71% of the CAP E and 21% of the CAP D populations. I did not assume that each of those customers would face termination, but I did assume that the number of historical terminations in that tier might reasonably be assumed to increase by the same percentage as the number of customers who would lose their discounts. For the PIP, that gave me the following results:

Tier	Existing Terminations	Increase/Decrease Factor	Change in Terminations
A/B	1,365	(90%)	(1229)
C	2,523	(90%)	(2271)

D	6,466	21%	1358
E	5,639	71%	4004
			1862

We then provided ranges around these numbers as previously presented:

	Current	12-Tier	12/Season	CAP	CAP Min	Cap Cost
Termination Change	0	200-400	(500-1,000)	1,500-2,000	1,500-2,000	3,000-4,500

**P-2012-2283641 – PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS
DEFAULT SERVICE PROGRAM & M-2012-2290911. Created 1/7/2013 (Revised)**

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