

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 + Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

www.bvrrlaw.com

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

July 9, 2014

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

RE: Comments of Commission on Economic Opportunity
PPL Universal Service Plan; Docket M-2013-2367021

Dear Secretary Chiavetta:

I am writing to submit comments pursuant to the Commission's Tentative Order entered on June 19, 2014 relative to PPL's Electric Universal Service Plan. I am submitting comments on behalf of the Commission on Economic Opportunity (CEO). CEO is a non-profit organization serving the low-income and elderly in Luzerne County, Pennsylvania. It is part of CEO's responsibility to advocate for the interests of our clients in regulatory proceedings; CEO has been an active and participating party before the Commission in rate cases, Act 129 proceedings, and universal service plan filings both involving PPL Electric and other electric and gas utilities operating in Pennsylvania. Further, CEO serves as a sub-contractor for PPL Electric's WRAP program as well for the LIURP programs of other Pennsylvania utilities. CEO is also the contractor/operator of PPL Electric's CAP and hardship assistance funds.

In general, CEO is supportive of PPL Electric's Universal Service Plan for the years 2014-2016. PPL has agreed to increase funding for its WRAP program to \$9.5 million annually as well as increasing the amount contractors can spend on health and safety measures for full-cost WRAP services from \$250.00 to \$650.00. CEO also supports the Plan's intent to increase the number of both full-cost and low-cost WRAP jobs as well as the inclusion of heat pump water heaters under WRAP's low-cost measures.

Like the Commission, CEO is concerned about the manner in which On-Track enrollees are referred for WRAP services but will reserve further comment until PPL responds to the proposed resolution set forth in the Commission's Tentative Order. Similarly, CEO reserves comment on the preclusion of a customer from receiving WRAP services if that customer received WRAP or Act 129 WRAP in the prior 7 years. However, CEO supports a more flexible approach

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that takes into consideration the extent of the previous WRAP services provided and whether they should preclude additional services within the 7 year window.

Respectfully yours,

A handwritten signature in black ink, consisting of a large, stylized loop at the top that descends into a vertical line with a small hook at the bottom.

Joseph L. Vullo

JLV/jar
encls.

cc: Joseph Magee, Bureau of Consumer Services (via email)
Louise Fink-Smith, Law Bureau (via email)
Cyndi Page, Office of Communications (via email)