



PULP

PENNSYLVANIA
UTILITY LAW PROJECT

July 21, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

Re: PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2014-2016 Submitted in Compliance with 52 Pa. Code § 54.74

Docket No. M-2013-2367021

Dear Secretary Chiavetta:

Enclosed are the reply comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan. These reply comments are filed in compliance with the Pennsylvania Public Utility Commission's June 19, 2014 Tentative Order in the captioned proceeding. Copies have been circulated pursuant to the attached Certificate of Service.

Please contact me if you have any questions about this filing.

Respectfully submitted,

Harry S. Geller

Enclosure

CC: Certificate of Service

PPL Electric Utilities Corporation's Universal
Service and Energy Conservation Plan for
2014-2016 Submitted in Compliance with
52 Pa. Code § 54.74

Docket No. M-2013-2367021

Certificate of Service

I hereby certify that I have on this day served a true copy of CAUSE-PA's Comments in the captioned proceeding upon the following persons in the manner listed below and in accordance with the requirements of 52 Pa. Code § 1.54.

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Dated: July 21, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITIES COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2013-2367021
2014-2016 Submitted in Compliance with :
52 Pa. Code § 54.74 :

**Reply Comments of Regarding PPL Electric Utilities Corporation Universal Service and
Energy Conservation Plan for 2014-2016**



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**On behalf of the Coalition for Affordable Utility
Services and Energy Efficiency in Pennsylvania**

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I. Introduction and Background

On June 3, 2013, in accordance with the Pennsylvania Public Utility Commission (PUC or Commission) regulations at 52 Pa. Code § 54.74, PPL Electric Utilities Corporation (PPL or Company) filed a proposed Universal Service and Energy Conservation Plan for 2014-2016 (USECP). On June 19, 2014, the Commission issued a tentative order finding that the Plan “partially complies with the universal service requirements of the Electricity Generation Customer Choice and Competition Act,” and ordered PPL and invited other parties to address eleven discrete points of concern. (PUC Tentative Order at 32-33 (hereinafter TO)). On July 9, 2014, PPL, the Office of Consumer Advocate (“OCA”), The Commission on Economic Opportunity (“CEO”), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed Comments in accord with the TO.

CAUSE-PA, through its attorneys at the Pennsylvania Utility Law Project, respectfully replies to the comments of PPL regarding two matters of particular consequence for OnTrack customers who are in danger of receiving unaffordable bills through no fault of their own: OnTrack participants who reach maximum CAP credits and OnTrack participants who change residences within the service territory.

II. OnTrack

- A. PPL should affirmatively determine if customers who reach maximum CAP credits are eligible for exemption.

CAUSE-PA is pleased that PPL has accepted the Commission recommendation that OnTrack customers continue to remain in OnTrack after reaching the allocated maximum CAP credits. This is an important change, as it enables OnTrack customers to continue receiving other types of critical assistance, including continued arrearage forgiveness.

That said, CAUSE-PA has concerns about PPL's proposal to automatically enroll OnTrack customers who exceed their maximum credits in budget billing, without first reviewing the OnTrack account to see if an exception to the maximum OnTrack credits may apply. While the proposal to enroll these customers in budget billing will have some ameliorative effect, the reality is that a budget bill based on full tariff rates will impose a significant and unaffordable energy burden on many of these households. As CAUSE-PA noted in its comments, exemptions to the credit limits are listed at 52 Pa Code § 69.265(3)(vi). In its comments, PPL did not indicate whether or to what extent it informs customers of these exemptions. Although PPL notifies its customers by letter when they reach 50% and 80% of their maximum CAP credits, the consequences of reaching these limits are significant and may not be apparent to all customers. Some customers may be eligible for exemptions to the maximum CAP credit control feature and would undoubtedly benefit from application of the exemption, rather than being automatically enrolled in budget billing at the full tariff rate. CAUSE-PA therefore recommends that PPL initiate out-bound calls OnTrack customers who exceed their maximum OnTrack credit to review the options available to that customer to help reach an affordable bill until their next recertification date and to affirmatively inquire whether any exemption applies.

- B. OnTrack customers should continue to receive OnTrack benefits without interruption when they move within PPL service territory.

In its comments, PPL indicated that the functionality of its current customer information system (CIS) requires that OnTrack participants be removed from the program to re-enroll them at their new location. PPL indicates that, although they have moved, the customer is still eligible for OnTrack and that PPL wants them to continue in the program. PPL commits to sending these customers a second letter encouraging reapplication and to not request additional documentation. Here too, CAUSE-PA appreciates these efforts attempting to ameliorate a bad situation, but

PPL's comments fail to address how "interim" billing will be handled. And, thus, CAUSE-PA continues to be concerned about the loss of OnTrack status and the risks faced by these households as a result of unaffordable bills received during the time they move and the time the household regains OnTrack status. These customers should continue to receive benefits without interruption, or at least be notified that they will receive a retroactive adjustment. CAUSE-PA respectfully submits that until PPL is able to modify its current CIS, that the Commission, at a minimum, require that PPL restore all OnTrack benefits retroactively to these households upon their reentry into OnTrack.

III. Conclusion

CAUSE-PA thanks the Commission for this opportunity to submit reply comments concerning the June 19, 2014 Tentative Order regarding the PPL Electric Utilities' Universal Service Plan for 2014-2016, and respectfully requests that the Commission refer this proceeding to an Administrative Law Judge prior to final approval to resolve issues of law and fact regarding critical aspects of the PPL universal service program provisions and require PPL to modify its Plan as reflected within these comments and reply comments and such testimony as may be presented to an Administrative Law Judge.

RESPECTFULLY SUBMITTED BY
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