

Paul E. Russell
Associate General Counsel



PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.4254 Fax 610.774.6726
perussell@pplweb.com

FEDERAL EXPRESS

July 21, 2014

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

RECEIVED

JUL 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation Universal Service and
Energy Conservation Plan for 2014-2016
Docket No. M-2013-2367021**

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is an original of PPL Electric's reply comments in the above-captioned proceeding. These reply comments are being filed pursuant to the Tentative Order entered on June 19, 2014 in the above captioned proceeding.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on July 21, 2014, which is the date it was deposited with an overnight delivery service.

Please date and timestamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding these comments, please call me at (610) 774-4254 or Timothy R. Dahl, Manager – Manager Programs and Business Services at (484) 634-3297.

Very truly yours,


Paul E. Russell

Enclosures

cc: Mr. Joseph Magee (via email)
Louise Fink-Smith, Esquire (via email)
Ms. Cyndi Page (via email)

Joseph L. Vullo, Esq.
Patrick M. Cicero, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: PPL Electric Utilities Corporation :
Universal Service and Energy :
Conservation Plan for 2014-2106 : Docket No. M-2013-2367021
Submitted in Compliance with 52 Pa. :
Code § 54.74 :

RECEIVED

JUL 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

TENTATIVE ORDER

Reply Comments of PPL Electric Utilities Corporation

I. Introduction

On June 19, 2014, the Pennsylvania Public Utility Commission ("PUC" or the "Commission") entered a Tentative Order at Docket No. M-2013-2367021 tentatively approving PPL Electric Utility Corporation's ("PPL Electric" or the "Company") proposed Universal Service and Energy Conservation Plan for 2014-2016 ("Plan"). Interested parties had twenty (20) days after entry of the order to file comments, and ten (10) days thereafter to file reply comments.

The Pennsylvania Office of Consumer Advocate ("OCA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE"), and the Commission on Economic Opportunity ("CEO") filed comments regarding PPL Electric's proposed Plan. PPL Electric also filed comments in which it addressed each of the eleven (11) points presented in the Commission's Tentative Order. In these reply

comments, the Company addresses, where appropriate, the recommendations, issues and concerns raised by the OCA, CAUSE and CEO in their comments. In addition, the Company responds to other recommendations and issues presented by these parties.

At the outset, the Company believes there are many areas of agreement between PPL Electric and the other parties. For example, there seems to be unanimity of agreement among all parties on the following key points: #1, #2, #4, #5, #6 and #8 presented in the Commission's June 19, 2014 Tentative Order. The other parties did not express concerns about the remaining points contained in the Tentative Order. Although there is some disagreement over Commission policy regarding Customer Assistance Programs ("CAP"), including shopping by CAP customers, there does not appear to be any substantive factual disagreements among the parties. Accordingly, PPL Electric does not believe that there is any need to refer this matter to the Office of Administrative Law Judge for further review and respectfully requests that the Commission enter a Final Order approving the Company's Plan as modified by the June 19, 2014 Tentative Order and PPL Electric's July 9, 2014 comments.

II. Points Raised by the Commission in its Tentative Order

Point #1: Allowing OnTrack customers to remain in the program after they have exceeded their CAP credit limits.

In their comments filed on July 9, 2014, both the OCA and CAUSE expressed their support of the Commission's resolution to have PPL Electric consider altering its current policy and allow OnTrack participants to stay in the program after they have exhausted their limit of CAP credits. In its comments filed on July 9, 2014, PPL Electric also agreed with the Commission's recommendation.

For OnTrack customers who exhaust their limit of CAP credits, the Company will enroll them in budget billing and continue to provide forgiveness of pre-program arrearages for payments made on time and in full. If the customers make up missed budget billing payments, PPL Electric will credit the arrearage forgiveness to their accounts. In addition, the Company has proposed in its comments to increase communications (e.g., letters and bill message) for these affected customers.

CAUSE recommended that PPL Electric be required to reach out by telephone to all OnTrack customers who exhaust their limit of CAP credits to determine if they are eligible for any of the exemptions listed at 52 Pa. Code § 69.265(3)(vi). The Company respectfully disagrees with this recommendation because, with its agreement to keep customers in OnTrack after they have exhausted their CAP credits, the exemptions are moot. Regardless of the reason why an OnTrack participant has exceeded his or her limit of CAP credits, PPL Electric will allow them to remain in the program, subject to the requirements discussed above. As a result, the Company can avoid the expenses and process changes required to implement CAUSE's recommendation.

From PPL Electric's perspective, 52 Pa. Code § 69.265(3)(vi) does not require utilities to exempt a household from a CAP control feature. The provision reads that a utility "may" exempt a household; it does not read that a utility "must" exempt a household from a CAP control feature. PPL Electric believes this means that a utility has discretion regarding implementation of this provision of the Commission's CAP Policy Statement.

Point #2: Allowing OnTrack customers to remain in the program when they relocate from one residence to another within the PPL service territory.

In its Tentative Order the Commission directed PPL Electric to explain if it could revise its policy and allow OnTrack customers who move to remain in the program. In their comments, both the OCA and CAUSE concurred with the Commission's desire to allow these customers to stay OnTrack. In its comments to the Commission, PPL Electric indicated that it wants these customers to remain in the program as well. Experience shows that approximately one in five OnTrack participants will move during the year. However, it would require considerable effort to change the billing system to allow customers to remain in OnTrack when they move. In the alternative, the Company has proposed to improve its internal processes, including the elimination of the requirement to provide documentation of household income at the new location and to expand customer communications. PPL Electric also would provide information and training to OnTrack caseworkers and would inform appropriate internal audiences (e.g., Customer Service Representatives) about the policy change.

Point #3: Providing the cost impact of moving from the past 12 to 36 month arrearage forgiveness to the proposed 18 month arrearage forgiveness.

The Commission directed PPL Electric to determine the cost impact of changing the arrearage forgiveness period from 12-36 months to 18 months for all OnTrack participants. The OCA, CAUSE and CEO had no comments regarding this request from the Commission. In its comments to the Commission Tentative Order, PPL Electric's analysis showed that arrearage forgiveness would increase by an estimated \$4.1 million in 2015, \$4.3 million in 2016, and \$4.5 million in 2017.

Point #4: Applying arrearage forgiveness retroactively to any month missed once those missed payments are caught up.

The Commission's Tentative Order requested that PPL Electric address the issue of whether it applies arrearage forgiveness retroactively once OnTrack customers have made up missed payments. CAUSE recommends that PPL Electric provide arrearage forgiveness retroactively when OnTrack customers cure missed payments. As indicated in its July 9, 2014 comments, this is already the Company's current practice. Because there appears to be some confusion, PPL Electric will add language to its three-year Plan to clarify this existing practice. The Company will also continue its practice of crediting late payment charges and providing revenue shortfall credits when OnTrack participants make up their missed payments.

Point #5: Ensuring that all OnTrack customers, regardless of when enrolled, are provided with access to energy education and conservation tips.

Both the OCA and CAUSE support the Commission's recommendation that PPL Electric take steps to refer existing high-use OnTrack customers to WRAP. As noted in its July 9, 2014 comments, PPL Electric agrees with this recommendation. The Company has established a strong link between OnTrack and WRAP, as witnessed by the fact that two-thirds of WRAP recipients also participate in OnTrack. PPL Electric will continue its efforts of reaching out to high-use OnTrack customers to encourage them to apply for WRAP services. As stated in its comments, one area of concern for PPL Electric is the relatively high percentage of landlords who will not give their permission for the installation of weatherization materials through WRAP.

Point #6: Screen OnTrack customers who are high energy users for WRAP.

This point directly relates to point #5 above. PPL Electric does identify high-use OnTrack customers and refers them to WRAP. In its comments to the Commission's Tentative Order, PPL Electric indicated that it would generate a quarterly report to identify high-use OnTrack customers (i.e., 18,000 kWh or more annually). The Company will screen this list and, where appropriate, refer customers to WRAP.

Point #7: Providing details regarding to which jobs the eligibility criterion apply and how future WRAP qualification might be effected.

None of the interested parties offered any comments regarding this point. In its comments, PPL Electric noted that the seven-year criterion applied to full cost, water heating and baseload jobs for WRAP and Act 129 WRAP. The Company indicated that its practice has been to waive this requirement for high-use customers, or for those who could benefit from new technology (e.g., heat pump water heater). In its comments to the Tentative Order, PPL Electric proposed to add clarifying language to its 2014-2016 Plan.

Point #8: Editing language to allow for disqualification of a premise from WRAP if it is determined that weatherization would not be cost-effective.

In its July 9, 2014 comments, the Company agreed with the Commission's recommendation to eliminate language related to the square footage of a home. It also agreed to eliminate language about the likelihood of selling the home to someone who was not low income. CAUSE supported the Commission's recommendation. As noted in PPL Electric's comments, the Company had eliminated this language in the text of its

proposed Plan, but inadvertently did not remove the language in a table. In its comments, PPL Electric also agreed to include language indicating that it would disqualify a premise if it is determined that weatherization would not be cost-effective.

In its Tentative Order the Commission expressed concern about the Company's proposal to eliminate the \$200 allowance for comfort, health and safety expenditures for baseload jobs. The OCA agrees with the Commission that PPL Electric should permit up to \$200 in expenditures for baseload jobs to address comfort issues. PPL Electric agrees with the Commission's recommendation and has proposed to expend up to \$250 for comfort, health and safety based on feedback from WRAP contractors. In its July 9, 2014 comments, the Company suggested a slightly higher level of expenditure to account for any diagnostic tests that may be required.

Point #9: Providing additional information on the new database and reporting system improvements to WRAP reporting and quality control.

The OCA, CAUSE and CEO did not provide any comments regarding the replacement of PPL Electric's WRAP V system, which it uses for reporting purposes (i.e., PUC-required reports and internal management reports) and for helping to manage WRAP. As indicated in its comments to the Commission's Tentative Order, PPL Electric believes that the new system, which should be in production by January 2015, offers a variety of improvements and benefits that will strengthen the effectiveness of the program.

Point #10: Updating the needs assessment with 2012 U. S. Census data.

The Commission recommended that PPL Electric update its needs assessment for the 2014-2016 Plan based on 2012 U. S. Census data. In its comments to the Tentative Order, PPL Electric agreed to do so. None of the other interested parties offered any comments regarding this point.

Point #11: Explaining the reasons behind the annual increases in its OnTrack budget from 2014 to 2016.

None of the interested parties provided comments regarding this point. PPL Electric explained in its comments to the Tentative Order that the primary driver behind the increase in expenditures during the three-year period was an anticipated growth in OnTrack participation. The Company believes that the proposed change in the eligibility requirements for OnTrack will increase both enrollment and expenditures. If approved by the Commission, income-eligible customers will no longer need a defaulted payment agreement to apply for OnTrack. Other factors as well (e.g., severe weather) could affect annual program costs. As shown in PPL Electric's comments to the Tentative Order, revenue shortfall costs for OnTrack were \$4.3 million in March 2013 and \$7.7 million in March 2014. A cold and prolonged 2014 winter was a contributing factor to this increase in program costs.

III. Other Recommendations and Concerns

In their comments to the Commission's Tentative Order, the OCA, CAUSE and CEO offered other recommendations and raised additional concerns. PPL Electric's responses to these suggestions and issues appear below.

- **Increase the level of enrollment in OnTrack**

Both the OCA and CAUSE recommend that PPL Electric implement additional efforts to increase enrollment in OnTrack. The Company agrees and has been working to increase program enrollment over the past several years. Examples of these efforts include the following:

1. Automated referrals to OnTrack – PPL Electric has increased the number of referrals from 10,000 monthly in 2011 to 15,000 monthly in 2014 – a jump of 50 percent.
2. Outreach initiatives – PPL Electric has implemented a variety of targeted mailings and telephone campaigns, bill messages and advertising at bus shelters in low-income areas and on the inside of mass transit buses.
3. Program literature – The Company has completely revised its program literature (i.e., style, look, color and content) for OnTrack.
4. System changes – PPL Electric has or will make various system changes to improve the implementation of OnTrack (e.g., bill messages and suppliers' charges on the bill).

PPL will increase enrollment in OnTrack from approximately 31,000 customers in January 2011 to an estimated 40,000 customers in November 2014, or 29 percent. The Company believes that changing the eligibility requirements by eliminating the need to have a defaulted payment agreement will push up enrollment as well. PPL Electric's objectives for OnTrack are to provide affordable payment agreements; to be mindful of

overall program costs charged to all residential customers¹; to meet Commission requirements and guidance; to work effectively with program partners; and to satisfy customers.

- **CAP Shopping**

The OCA and CAUSE expressed their concerns about CAP customers who shop for their generation supply. The OCA is troubled about the impact of shopping on the costs paid by other residential customers and the affordability of bills for OnTrack customers. Similarly, CAUSE has concerns about shopping decisions that would result in OnTrack participants prematurely exhausting their annual allotment of CAP credits because they had selected suppliers with prices significantly above PPL Electric's Price to Compare ("PTC").

Given these issues and concerns, the OCA is proposing an on-the-record proceeding to develop further information about shopping by OnTrack participants. CAUSE recommends that the Commission hold in abeyance any decision about shopping by OnTrack customers until the Commonwealth Court has ruled on two appeals related to CAP customers and shopping. If the Commonwealth Court finds that *the Commission has the authority to limit the prices charged by an electric generation supplier ("EGS")*, CAUSE recommends that the Commission refer PPL Electric's Plan to the Office of Administrative Law Judge to determine if the restrictions apply for OnTrack.

PPL Electric agrees that OnTrack shopping can affect customers' ability to remain in the program if they have selected a supplier with very high energy prices. For

¹ Annual program costs for OnTrack have increased from \$14.7 million in 2004 to \$48.2 million in 2013. Projected costs in 2014 for OnTrack will be approximately \$65 million.

customers in OnTrack, monthly payments remain the same, whether they are shopping or not shopping. Any changes in payment amounts generally occur at the time of re-certification. As noted above, the primary impact of high supplier prices for OnTrack customers is to increase the “burn rate” of CAP credits. However, customers have done remarkably well in managing the use of their CAP credits. As stated in PPL Electric's *comments to the Tentative Order, over the past four (4) years (2010-2013)*, the Company has, on average, removed only two (2) percent of OnTrack participating for exceeding their annual limit of CAP credits.

From the perspective of PPL Electric, shopping issues (e.g., prohibiting CAP customers from selecting a supplier with prices above the PTC) related to CAP customers are public policy issues having implications that go beyond the scope of an individual utility's three-year Universal Service and Energy Conservation Plan. Shopping by CAP participants affects all electric and natural gas utilities in the Commonwealth. Requesting that the Commission direct the Office of Administrative Law Judge to address this broad issue on a case-by-case basis seems inappropriate. Such an approach could lead to a patchwork of individual company orders that could create more confusion rather than clarity.

The Commission has been abundantly clear that CAP customers can shop and that utilities cannot restrict them to selecting only suppliers with prices at or below the PTC.² PPL Electric appreciates the complexities and concerns that shopping can create for some OnTrack customers. The Company believes that it has proposed a

² *Joint Statement of Chairman Robert F. Powelson and Commissioner Pamela A. Witmer, Public Meeting March 6, 2014; 2283641-OSA; Docket No. P-2012-2283641.*

reasonable approach for shopping by OnTrack customers. At the time of re-certification, the system will look at the choices made by OnTrack shoppers (i.e., selected a supplier with prices either above or below the PTC) and establish payment agreements that reflect those choices.³ Some OnTrack customers may keep their same level of payment or have a lower amount, while others may have to pay more because of the choice of suppliers. To better inform OnTrack shoppers about their choices of supplier and the impact on their allotment of CAP credits, PPL Electric will begin showing the EGS's price per kWh on customers' bills in August 2014. The Company will continue its practice of sending letters to OnTrack customers when they hit specific usage milestones for their CAP credits (i.e., 50 percent, 80 percent and 100 percent).

- **Payment Agreement Options and Affordability**

Both the OCA and CAUSE identified issues regarding payment agreement options for OnTrack participants. The OCA stated that it wants additional information on the impact of PPL Electric's proposal to eliminate the percent of income and annualized average payment options for OnTrack customers. CAUSE wants to ensure that OnTrack customers have affordable payment plans that meet the Commission's affordability guidelines contained in its CAP Policy Statement.

PPL Electric also wants to establish affordable payment agreements for OnTrack customers. The Company wants customers to be successful in the program, which includes making regular monthly payments, reducing their pre-program arrearages, and participating in WRAP. Establishing unaffordable payment amounts results in defaults,

³ For OnTrack customers on percent of bill and minimum payment plans, the system will automatically calculate payment agreements that reflect their shopping choices. For customers who have an agency selected plan, the OnTrack agency caseworkers will follow a uniform process to calculate the agency selected amount.

increased credit and collection costs and, ultimately, greater write-offs of bad debts for PPL Electric.

Regarding the OCA's concern about the elimination of two (2) of the five (5) payment options for OnTrack, the Company believes that the impact will be minimal for the following reasons. First, compared with other Pennsylvania utilities that offer only one payment option (e.g., percent of income plan), PPL Electric proposes to offer three (3) payment options (percent of bill, minimum payment and agency selected). Second, the agency selected option offers sufficient flexibility to meet the needs of customers' individual circumstances. The community-based organizations that administer OnTrack have access to PPL Electric's customer information system, which allows them to review kWh usage history, bill amounts and payment patterns. Having access to this information helps them to tailor OnTrack payment agreements based on customers' unique situations. Third, and more importantly, the Company looked at OnTrack payment agreements by type and amount for 2013, and found that four of the payment types had very similar payment amounts: \$85 for percent bill, \$83 for percent of income, \$82 for annualized average, and \$80 for agency selected. As expected, the minimum payment amount (\$59) was the lowest. PPL Electric believes that its proposal to offer three payment options will provide affordable bills to OnTrack participants and will have a minimal impact on their payment behaviors.

CAUSE supports flexibility in payment plan options for OnTrack customers, but wants assurances that the payment amounts fall within the Commission's affordability guidelines. PPL Electric has programmed its computer system to calculate OnTrack payments, except for the agency selected option. The system ensures that no payment

agreement will exceed the Commission's guidelines for electric heating and electric non-heating based on household income and level of poverty (e.g., no more than 16 percent for a heating customer with household income between 51-100 percent of the poverty level). The Company has also programmed the system to set minimum payment amounts for heating and non-heating customers. The system will not allow an OnTrack caseworker to establish a payment agreement lower than the minimum amounts, including the agency selected option.

- **OnTrack Overpayment**

CAUSE recommends that the Commission direct PPL Electric to apply an OnTrack customer's overpayment to any unpaid balance and then to the customer's next "asked to pay" amount. The Company agrees with this suggestion. PPL Electric's experience has shown that very few OnTrack participants make intentional overpayments, but it does happen. When it does, PPL Electric's system treats the overpayment amount as an "excess credit" and applies it the customer's revenue shortfall amount at time of billing. The Company believes that the recommendation from CAUSE is fairer for the customer. PPL Electric proposes to complete this system change in the fourth quarter of 2015, along with the system change discussed in the Company's response to Point #1 in the Commission's Tentative Order.

- **Zero Income Customers**

With the Commission's approval of previous three-year Plans, it has long been PPL Electric's practice to require that customers have household income to apply for participation in OnTrack. The OCA recommends that PPL Electric allow customers with

zero income to enroll in OnTrack. The Company respectfully disagrees with this suggestion. Allowing customers with zero income to enroll in the program increases risk for PPL Electric. Intentionally enrolling customers with no apparent ability to pay their OnTrack bills seems counterintuitive. The Company would have concerns about the ability of these customers to make consistent and timely payments.

The OCA notes that the Pennsylvania Department of Public Welfare ("DPW") has a process in place for households that claim to have no income to apply for LIHEAP benefits.⁴ PPL Electric does not believe this comparison is germane. DPW is simply providing energy assistance grants; it is not requiring anything from these households *other than documentation that they have no income*. On the other hand, PPL Electric is expecting OnTrack participants to make monthly payments. The Company believes it is inappropriate to enroll customers in OnTrack who have zero household income.

- **OnTrack and Lifestyle Customers**

The Lifestyle approach for OnTrack addresses customers who have household incomes less than or equal to their mortgage payments or rent, but they are not in foreclosure or facing eviction. Although these customers report very low incomes, they are managing to pay their mortgage or rent, OnTrack bill, food and other household necessities. CAUSE concludes that PPL Electric uses the term Lifestyle to mean that these customers are living a lifestyle they cannot afford. In fact, the Company's concern is these customers may not be reporting all sources of household income.

⁴ LIHEAP = Low-Income Home Energy Assistance Program

CAUSE recommends that PPL Electric modify its criterion for OnTrack Lifestyle customers in order to allow these customers to demonstrate how they are able to pay their monthly expenses. PPL Electric respectfully disagrees with this recommendation. The purpose of OnTrack Lifestyle is to give these customers six (6) months of full benefits. If their situation has not changed within these six (6) months (e.g., newly documented income or the foreclosure or eviction process has started), the Company removes them from OnTrack. PPL Electric can recall few, if any, situations where OnTrack Lifestyle customers actually faced foreclosure or eviction. PPL Electric believes the OnTrack Lifestyle is a fair and reasonable approach for customers who report household incomes less than their mortgage payments or rent.

- **Funding for WRAP**

In its proposed three-year Plan for 2014-2016, PPL Electric recommended an increase in annual funding for the Winter Relief Assistance Program (“WRAP”) from \$8.0 million to \$9.5 million. Both CAUSE and the Commission on Economic Opportunity (“CEO”) expressed their support for this increase in WRAP funding. CEO also concurred with PPL Electric’s proposal to increase the expenditure amount for health and safety features for WRAP full-cost jobs from \$250 to \$650.

The primary driver for the proposed increase in funding was the Company’s projection that it would see an increase in the number of heating and water heating weatherization jobs, and a significant decrease in the number of baseload jobs due to changes in Act 129 WRAP. The focus for Act 129 WRAP is mostly water heating jobs and the installation of a limited number heat pump water heaters.

IV. Conclusion

PPL Electric appreciates the opportunity to submit reply comments regarding the Commission's Tentative Order for the Company's proposed 2014-2016 Universal Service and Energy Conservation Plan. It was instructive for PPL Electric to learn more about the areas of interest and concern identified by the OCA, CAUSE and CEO. Although there is not unanimity of agreement on all of their recommendations, the Company believes their feedback will help to improve the final Plan. PPL Electric has proposed a reasonable Plan that effectively addresses concerns raised by the Commission and other parties, complies with the requirements of 52 Pa. Code §§ 54.71-54.78, and improves programs and services for qualified low-income households.

There is substantial agreement between PPL Electric and the interested parties regarding the points discussed in the Commission's Tentative Order, and the Company agrees with a number of additional recommendations they offered in their comments. PPL Electric believes that it has been responsive to key issues raised by the Commission, the OCA, CAUSE and CEO. However, the Company does have concerns about the recommendation from both the OCA and CAUSE to conduct evidentiary hearings regarding CAP shopping. From PPL Electric's perspective, the issues raised by the OCA and CAUSE regarding CAP shopping are broader public policy issues that go beyond the purpose and scope of a three-year Plan. The Company is also concerned that conducting hearings would significantly delay the implementation of the benefits and improvements presented in the proposed Plan, including the suggestions offered by the OCA and CAUSE in their comments on the Commission's Tentative Order.

PPL Electric is committed to implementing quality programs and services for low-income customers, and will continue to work collaboratively with the various community-based organizations that help to administer the programs. PPL Electric respectfully requests that the Commission enter a Final Order approving the Company's Plan as modified by the June 19, 2014 Tentative Order and PPL Electric's July 9, 2014 comments.

Respectfully Submitted,

A handwritten signature in black ink, reading "Paul E. Russell", written over a horizontal line.

Paul E. Russell
Associate General Counsel
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101
610-774-4254

Dated: July 21, 2014
at Allentown, Pennsylvania