



August 15, 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:

On August 6, 2014, PPL Electric Utilities Corporation (PPL) filed revised information regarding its proposed Universal Service and Energy Conservation Plan for 2014-2016. This filing was made in response to the Commission's tentative order entered June 19, 2014. Specifically, PPL updated its needs assessment using 2012 U.S. Census data. PPL's filing also provided additional information about the cost of updating its computer system to accommodate a seamless move for OnTrack participants so that they would not lose benefits when they move from one home within PPL's service territory to another. PPL estimates that it would cost \$70,000 to make this change. PPL also responded that it would be too cumbersome and costly to implement CAUSE-PA's suggestion that if a seamless move were not possible that it grant retroactive OnTrack benefits to those households who move within the service territory.

On August 7, 2014, Joseph Magee, Policy Analyst from the Commission's Bureau of Consumer Services, sent an e-mail to all parties providing the opportunity to respond to PPL's supplemental submission. This response is made pursuant to that request.

CAUSE-PA appreciates that PPL now appears to be committed to implement, at some time in the future, an automated process whereby customers would not have to recertify, reapply, or lose OnTrack benefits when they move within the service territory. This makes good sense and the Commission's Final Order should require PPL to make this change as soon as possible.

In the interim, however, CAUSE-PA continues to assert that OnTrack customers who relocate within PPL service territory should not lose their OnTrack benefits for any period of time – either before, during, or after their move – and should not be required to reapply for OnTrack, as the application process is both timely and expensive.

By PPL’s estimation, there would potentially be approximately 8,000 OnTrack customers who relocate within the PPL service territory each year. PPL asserts that the cost and burden associated with ensuring that these customers continue to receive discounted energy through retroactive application of OnTrack discounts is too great, and would require a cumbersome, manual process.

But PPL presently requires each relocating OnTrack customer to reapply and recertify the household information. This is a cumbersome, manual process for the customer, the company, and the agency performing the process. It is difficult to conceive that PPL is not already paying its subcontractors to enter the data and change the CAP or billing formula for each of these potential 8,000 annual reapplications and re-certifications.

CAUSE-PA respectfully suggests that PPL could modify its existing OnTrack enrollment process by changing the CAP customer’s address, without removing them from OnTrack, and continue the existing OnTrack rate until the normal (non-relocation) reapplication and recertification date. This simple modification to OnTrack enrollment would enable relocating OnTrack customers to retain their enrollment status throughout their move, without placing any burdensome cost or time requirement for the customer, the company, or the agency performing the process

CAUSE-PA agrees that the entirety of the OnTrack application system should be automated, and submits that until such automation occurs, the problem could be avoided upfront. However, until such automation occurs, if the Commission permits PPL to continue its practice of removing 8,000 relocating customers annually from OnTrack status and requiring each of those customers to go through the lengthy and burdensome reenrollment process while paying full tariff rates, PPL should be required to: (1) retroactively factor the difference in old and new CAP rates or CAP and non-CAP rates into the relocating customer’s OnTrack bill for the new residence, and (2) act to assure that customers not be subject to termination or other sanction during the “interim” period between a move to a new residence and readmission into OnTrack.

CAUSE-PA thanks the Commission for the opportunity to submit these supplemental comments.

Respectfully submitted,



Harry S. Geller, Esq.
Elizabeth R. Marx, Esq.
Counsel for CAUSE-PA

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 Supplemental Comments in Response to PPL's August 6, 2014 revised filing** 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.

BY E-MAIL ONLY, Microsoft Word Copy:

Joseph Magee, BCS
jmagee@pa.gov

Louise Fink Smith, Law Bureau
finksmith@pa.gov

Cyndi Page, Office of Communications
cypage@pa.gov

By E-mail and U.S. Mail:

Johnnie Simms, Esquire
Bureau of Investigation & Enforcement
Pa. P.U.C.
400 North Street
Harrisburg, PA 17101
josimms@pa.gov

John R. Evans
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
jorevan@pa.gov

Paul E. Russell, Esquire
Associate General Counsel
PPL Corporation
2 North Ninth Street
Allentown, PA 18101
perussell@pplweb.com

Christy M. Appleby, Esquire
Amy E. Hirakis, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101
cappleby@paoca.org
ahirakis@paoca.org

Respectfully submitted,



Harry S. Geller, Esq.
Elizabeth R. Marx, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088
pulp@palegalaid.net

Dated: August 15, 2014