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

February 24, 2015

RECEIVED
FEB 24 2015
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Re: Chapter 14 Implementation Tentative Order
Docket No. M-2014-2448824

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is an original of PPL Electric's comments in the above-captioned proceeding. These comments are being filed pursuant to the Tentative Order entered on January 15, 2015 in the above captioned proceeding.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filled on February 24, 2015, 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 Russell /ers

Paul E. Russell

Enclosures

cc: Mr. Daniel Mumford
Ms. Patricia T. Wiedt

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Chapter 14 Implementation
Tentative Order
Docket No. M-2014-2448824

RECEIVED
FEB 24 2015
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I. Introduction

On January 15, 2015, the Pennsylvania Public Utility Commission ("Commission" or the "PUC") entered a *Tentative Order* at the above-captioned docket seeking comments from interested parties regarding certain new provisions of Chapter 14 of the Public Utility Code, also known as Act 155. The Tentative Order appeared in the *Pennsylvania Bulletin* on Saturday, January 31, 2015, with a 30-day comment period. Specifically, the Commission requested comments on the following two issues:

- Section 1403, Definition of *Medical Certificate*: The Commission is approving the "form" that a medical certificate must take.
- Section 1410.1(3) and (4): Utility reporting requirements concerning accounts with arrearages in excess of $10,000 and annual reporting of medical certificate usage.

Although it will ultimately promulgate a rulemaking to revise Chapter 56 of its regulations, the Commission considers the above two issues as the most pressing and in need of clarification. The Commission believes there is value in addressing more urgent issues through a Tentative Order. The PUC also invited parties to identify other Act 155 implementation issues the Commission should address sooner rather than later. In addition, other implementation issues may need to be resolved either in the *rulemaking or another related proceeding.*

PPL Electric Utilities Corporation ("PPL Electric" or the "Company") commends the Commission for taking early action in issuing a Tentative Order. Because a formal rulemaking can be a lengthy process, helping utilities to clarify up front operational issues and reporting requirements arising from Act 155. PPL Electric appreciates this opportunity to provide input to the Commission. The Company's specific comments and suggestions are as follows.

II. Specific Comments

1. Section 1403, Definition of *Medical Certificate*

PPL Electric agrees that addressing issues regarding medical certificates should be a priority for the Commission. As noted by the Commission, the use of medical certificates clearly has important public health and safety considerations. Customers use them to prevent termination of service or to restore service more quickly. However, as the Commission correctly points out, customers who receive medical certificates still have a responsibility to pay for their service under 52 Pa. Code § 56.116. Utilities also have the responsibility to implement the medical certificate provisions in accordance with Commission regulations and guidance.

Medical Certificate Form

The Commission requested specific comments on ". . . what "form" should be sufficient for a medical certificate." The Company agrees the form should be convenient and easy to use for customers and medical professionals in order to avoid confusion and delays. PPL Electric further agrees the word "form" in the regulation does not mean literally a "form." An absolute and literal definition would be detrimental to both the Commission's medical certificate regulations and utilities' internal processes. PPL Electric supports the wording that currently appears in 52 Pa. Code § 56.113, indicating the certificates initially may be written or oral. Having this type of flexibility is more customer-friendly, serves the needs of doctors' offices, and is consistent with the Company's existing procedures. PPL Electric's years of experience with administering medical certificates show that "one size" does not fit all. Some doctors' offices use the Company's form, some prefer their own form, and others rely on oral communications.[1]

Content of Medical Certificate

The Commission's January 15, 2015 Tentative Order invited interested parties to comment on: 1) what information a medical certificate should contain; and 2) the adequacy of the information contained in the current regulation at § 56.113. Under current regulation, medical certificates must contain the following information:

> (1) The name and address of the customer or applicant whose name the account is registered.
>
> (2) The name and address of the afflicted person and relationship to the customer or applicant.
>
> (3) The nature and anticipated length of the affliction.
>
> (4) The specific reason for which the service is required.
>
> (5) The name, office address and telephone number of the certifying physician or nurse practitioner.

PPL Electric believes the above information requirements are appropriate and adequate but recommends a slight modification. The Commission should delete item (3) because it is not essential for utility personnel to know the nature and length of the affliction. In

[1] See Exhibit 1 for a copy of PPL Electric's current medical certificate form.

the alternative, if the Commission believes that retaining item (3) is important, then PPL Electric suggests changing the wording to read as follows: "The anticipated length of the affliction." PPL Electric recommends deleting the word "nature" to help ensure customer privacy regarding personal medical issues and to remove the potential for any value judgments by utility personnel regarding a customer's medical condition. It is a matter of trusting the medical professionals who have the most complete and thorough knowledge about customers' medical status.

As directed by the Commission, PPL Electric will continue to use its existing medical certificate procedures until it receives initial guidance from the Commission through a Final Order and, ultimately, final resolution through a Chapter 56 rulemaking. The Company's current procedures allow for accepting medical certificates from physicians, nurse practitioners, and physician assistants.

2. Section 1410.1(3): Utility Reporting Requirements re: Accounts Exceeding $10,000 in Arrearages:

As noted in the Commission's Tentative Order, Section 1410.1(3) raises a number of questions and concerns. The provision reads as follows:

> *(3) The public utility shall have an affirmative responsibility to attempt to collect payment on an overdue account. The utility shall report to the commission annually residential accounts which have accumulated $10,000 or more in arrearages and shall demonstrate what efforts are being made to collect the arrearages. Failure to make reasonable attempts to collect payments on overdue accounts with arrearages in excess of $10,000 may result in civil fines or other appropriate sanctions by the commission.*

PPL Electric supports the Commission's efforts to provide clarification and guidance regarding this new reporting requirement. The Company also concurs with the

Commission's conclusion that waiting until the completion of a final rulemaking is too late. Providing direction at the start of the regulatory process will help utilities to: 1) gain a clearer understanding of what data they must collect; 2) identify any system and process changes needed to comply with the new reporting requirement; and 3) provide data to the Commission in a timely manner.

Interpretation of Legislative Intent

The Commission invited comments regarding the interpretation of the General Assembly's intent on the reporting of specific accounts versus the "number of accounts" or "averages." In reading the statute, PPL Electric believes the General Assembly meant individual accounts rather than simply a total number of accounts, total dollars past due, average arrearage, etc. If it had meant otherwise, the General Assembly would have inserted language indicating it was looking only for summary data. Furthermore, simply providing aggregate data for all of these accounts would provide little insight into their nature and make-up. From PPL Electric's perspective, it seems likely the General Assembly intended that the reporting of this data would provide greater clarity and understanding regarding the factors behind the growth in these arrearages. This type of knowledge could ultimately result in changes to the Commission's regulations or utilities' collection policies and practices.

To assist parties in framing their responses regarding the reporting of past due balances of $10,000 or greater, the Commission's Tentative Order offered a possible interim guideline for utilities. PPL Electric has used this interim guideline to present its comments.

- Utilities shall examine all of their residential accounts (a "snapshot") at the conclusion of each calendar year. Any account with an arrearage at or exceeding $10,000 at that time shall be reported to the Commission by March 1 of the following year.

Response: PPL Electric agrees with a "snapshot" of active residential balances of $10,000 or greater at the end of the calendar year. The proposed reporting date of March 1 of the following year would be workable, but PPL Electric recommends a reporting date of April 1 because it is more in line with other reporting deadlines established by the Commission. In addition, because it will be difficult for the Company to automate its customer information system to obtain this data, PPL Electric will have to run individual computer queries. A reporting date of April 1 would help facilitate this data gathering process for the Company and other utilities in Pennsylvania. The calendar year reporting period coincides with other Commission reports as well (e.g., Universal Service Programs & Collections Performance and Customer Service Performance Report).

- Each account reported should be identified to the Commission with a unique label that the utility can match to the account in question. Customer names, addresses, account number or other information that could be used to identify the customer shall not be included.

Response: PPL Electric shares the Commission's sensitivity to protecting customers' privacy. The Company can provide unique identifiers for each of the affected accounts in the annual report. In addition to excluding customers' names, addresses, etc., PPL Electric recommends excluding customers' telephone numbers and e-mail addresses. Their Social Security Numbers should remain confidential as well.

- The information concerning each of the accounts shall include: account balance as of the time of the "snapshot" and the time period over which that arrearage accrued (in years or months). For that time period, the average monthly bill amount; number of Commission informal or formal complaints; and the number of company payment arrangements.

Response: PPL Electric agrees with the Commission's proposal regarding the above information items utilities would submit. PPL Electric believes the Commission has struck the appropriate balance in meeting the General Assembly's mandate of effectively monitoring utilities' collection practices and results and the ability of utilities to provide the required data. For the annual reporting requirements, utilities should not be required to provide data such as rate class, homeowner or renter, type of heat, etc. These data generally are not relevant to the arrearage issues being addressed by this reporting requirement. However, if needed, the Commission can always request this type of information from utilities for individual accounts.

- Reporting should begin, under these interim guidelines, with calendar year 2015 – the first annual report would be due to the Commission by March 1, 2016.

Response: For reasons discussed above, PPL Electric recommends a proposed reporting date of April 1, 2016.

- The Commission may request more detailed follow-up information on specific accounts.

Response: PPL Electric has no concerns regarding this provision of the proposed interim guidelines. The Company maintains detailed information about customers' individual accounts and has provided such information to the Commission on previous occasions.

- Reports shall be filed with the Commission's Secretary under the docket number for this order. An electronic courtesy copy shall be provided to the Director of the Bureau of Consumer Services at the same time.

Response: PPL Electric has no concerns with this proposed requirement. If, in the future, the Commission decides to collect this data electronically, the filing with the Secretary's Bureau and the courtesy copy to the Director of the Bureau of Consumer Services may be only a letter indicating that the utility has entered all of the required data into the Commission's database.

- *Reports shall be formatted per a specific spreadsheet format* provided by the Commission. The Commission will provide this format by the end of calendar year 2015.

Response: PPL Electric agrees with the Commission's proposal to provide a specific spreadsheet format that utilities would use to enter data. For greater security of customer data and the ease of use by utilities, PPL Electric recommends the Commission work to eventually develop an approach similar to its Quality of Service annual report. To enter the required data into the Quality of Service system, utilities use a login and a unique password provided by the Commission. The Company believes this approach would work well with reporting the data required by Act 155.

Because developing an electronic database may take time, PPL Electric *recognizes the Commission initially will need to rely on spreadsheets (e.g., Excel)* provided by utilities to capture the required data. The Company can easily accommodate this requirement but encourages the Commission to work towards developing an electronic database.

3. Section 1410.1(4): Utility Reporting Requirements re: Medical Certificates

The new requirement of Section 1410.1(4) is as follows:

> *(4) The public utility shall report to the commission on an annual basis the number of medical certificates and renewals submitted and accepted in the service territory.*

In its January 15, 2015 Tentative Order, the Commission offered a proposal for interested parties to provide feedback on this new requirement. PPL Electric has framed its comments based on the Commission's proposal.

- At the conclusion of each calendar year, the utility shall count the number of medical certificates offered and/or accepted for the previous 12 months.

Response: To be consistent with the wording in § 1410.1(4), PPL Electric recommends the following wording: "At the conclusion of each calendar year, the utility shall count the number of medical certificates submitted and accepted for the previous 12 months." PPL Electric interprets "submitted" as receipt of a medical certificate from a physician, nurse practitioner, or physician's assistant. The Company suggests removing the "and/or" conjunction because it is somewhat confusing. As currently written, it appears utilities would have the option of only reporting the number of medical certificates accepted. PPL Electric believes the legislation clearly intends to capture both medical certificates offered and accepted.

- At the conclusion of each calendar year, the utility shall count the number of accounts that had a medical certificate offered and/or accepted for the previous 12 months.

Response: PPL Electric recommends deleting this provision because it appears to be somewhat duplicative of the first provision above and may conflict with the requirements of § 1410.1(4), which requires only the reporting of the number of medical certificates submitted and accepted. PPL Electric prefers to be consistent with the plain language reporting requirements of § 1410.1(4).

- The medical certificates shall be classified and reported as: number of initial medical certificates submitted and the number of initial medical certificates accepted; number of renewal medical certificates submitted; and number of renewal medical certificates accepted.

Response: PPL Electric believes that reporting medical certificate data as outlined immediately above will provide the Commission with the required data it needs.

- This data shall be submitted to the Commission's Secretary under the docket number of this order by March 1 of the following year. An electronic courtesy copy shall be provided to the Director of the Bureau of Consumer Services at the same time.

Response: PPL Electric could meet the March 1 deadline but recommends a reporting date of April 1 for providing this data to the Commission. Similar to its comments above, the Company recommends that the Commission work to develop a procedure allowing utilities to report this data electronically.

- The data shall be formatted per a specific spreadsheet format provided by the Commission. The Commission will provide this format by the end of calendar year 2015.

Response: PPL Electric suggests that utilities could add this information to the end of the 52 Pa. Code Chapter 56.231 annual report, which they submit on April 1st. Until the Commission can modify the Chapter 56.231 report to capture such data, the Company recognizes utilities will need to submit the data in a spreadsheet format. PPL Electric recommends the Commission develop a simple spreadsheet to capture the required data. See Exhibit 1 for a sample spreadsheet.

- Reporting shall begin, under these interim guidelines, with calendar year 2015 – the first annual report would be due to the Commission by March 1, 2016.

Response: For reasons discussed above, PPL Electric recommends a proposed reporting date of April 1, 2016.

III. Conclusion

PPL Electric appreciates the opportunity to provide comments to the Commission regarding its Chapter 14 Implementation Tentative Order. Addressing more pressing issues in a timely manner is a prudent step by the Commission. Understanding the "rules of the road" will help utilities to better develop and implement procedures to meet Commission requirements. PPL Electric commends the Commission for actively seeking comments and suggestions from interested parties. Constructive feedback from key stakeholders can help promote more effective public policy and achieve regulatory objectives.

The Tentative Order also encouraged interested parties to identify other issues needing more immediate attention from the Commission. PPL Electric has not identified any such pressing issues. However, the Company will provide additional comments, as warranted, as the Commission moves through the formal rulemaking process for Chapter 56.

From: (610) 774-4254
Paul E Russell
PPL Corporation
2 N 9th Street

Allentown, PA 18101

Origin ID: ABEA

FedEx. Express

E

J151215022303uv

Ship Date: 24FEB15
ActWgt: 1.0 LB
CAD: 104308816/INET3610

Delivery Address Bar Code

RECEIVED

FEB 24 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SHIP TO: (717) 772-7777 BILL SENDER

ROSEMARY CHIAVETTA, SECRETARY
PA Public Utility Commission
400 NORTH ST
COMMONWEALTH KEYSTONE BUILDING
HARRISBURG, PA 17120

Ref # PER 205 734268-000
Invoice #
PO #
Dept #

WED - 25 FEB 10:30A
PRIORITY OVERNIGHT

TRK# 7729 7842 7074
0201

EN MDTA

17120
PA-US
MDT

537J2/D3CE/EE4B

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.
Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is $1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.