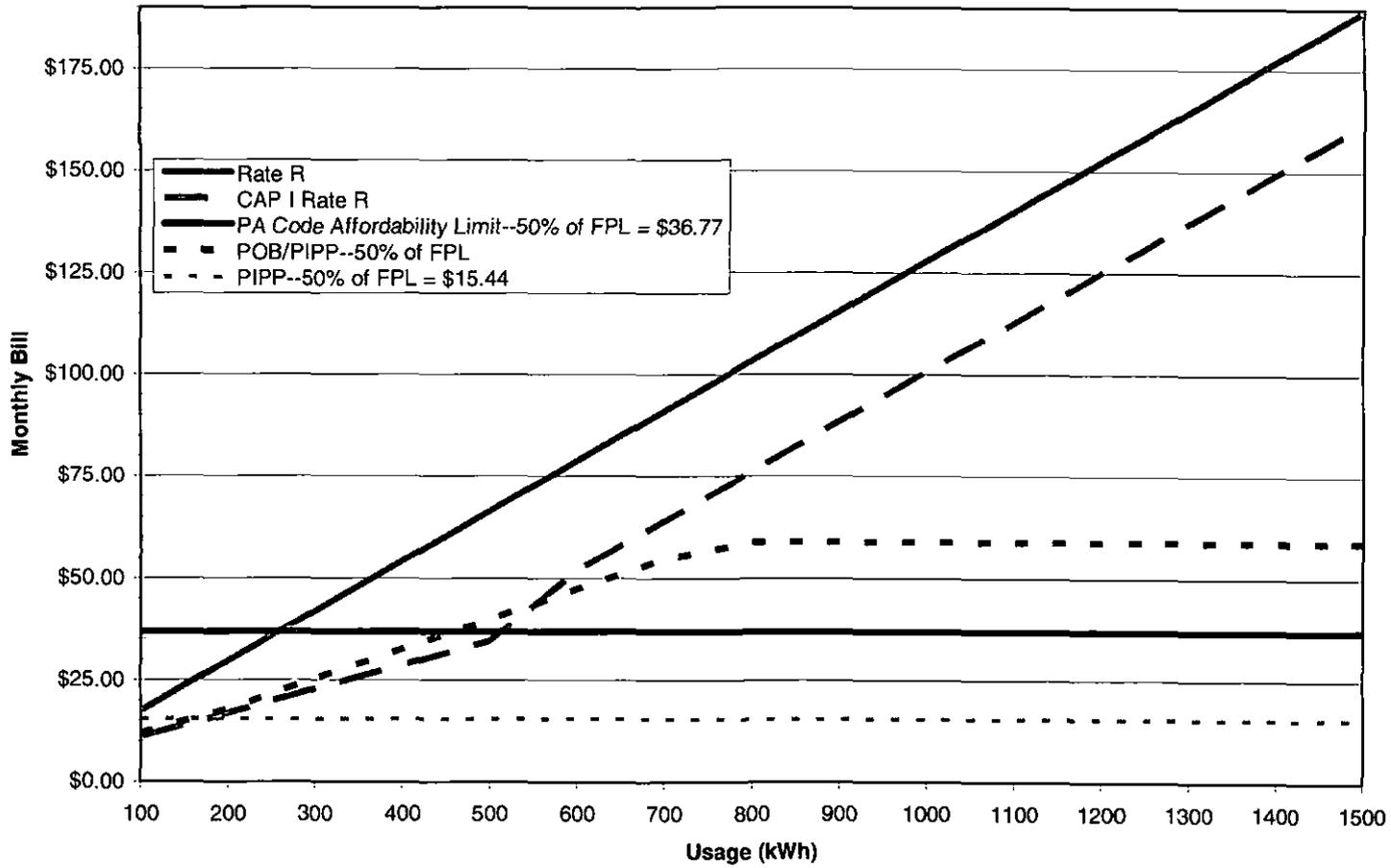
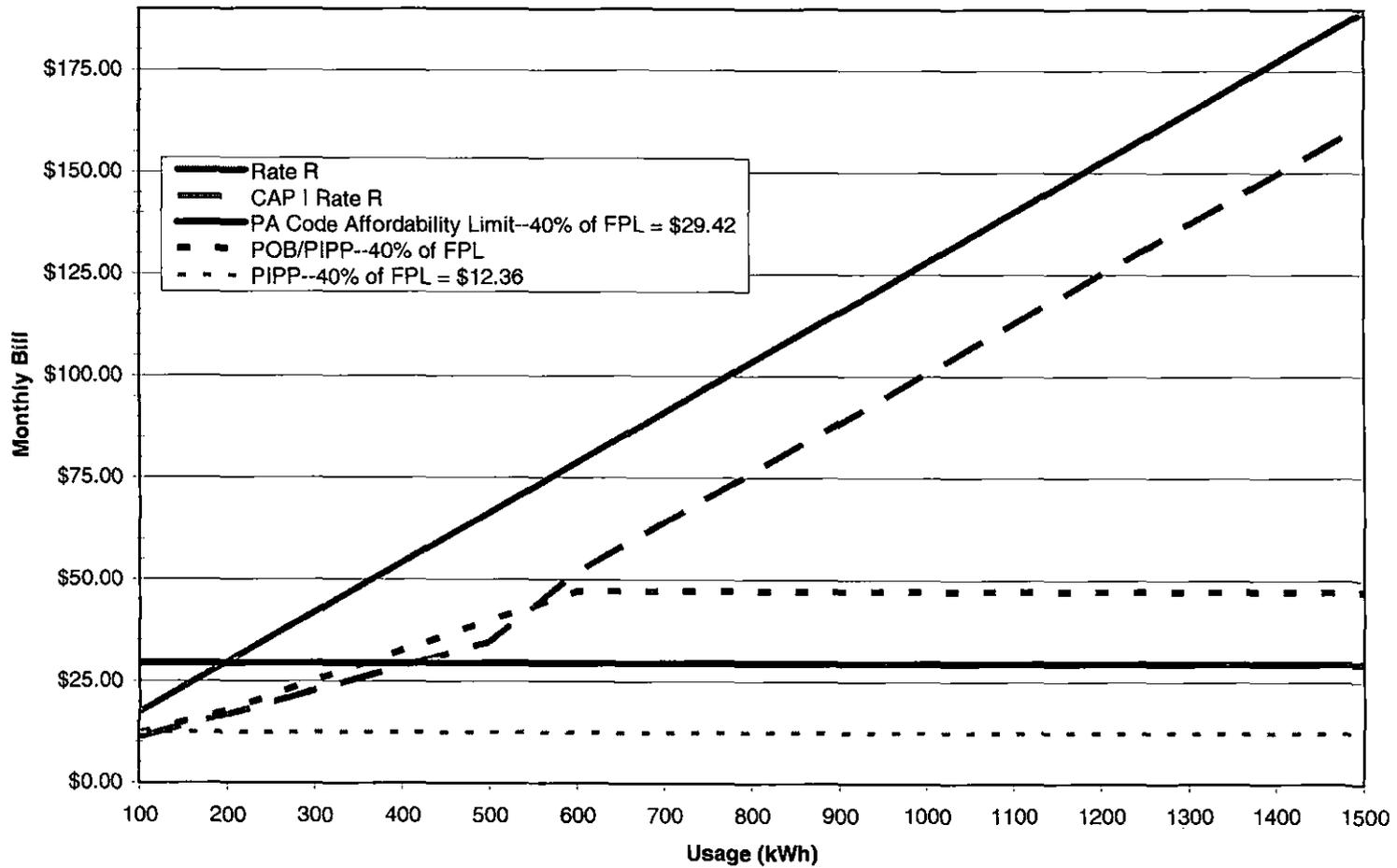


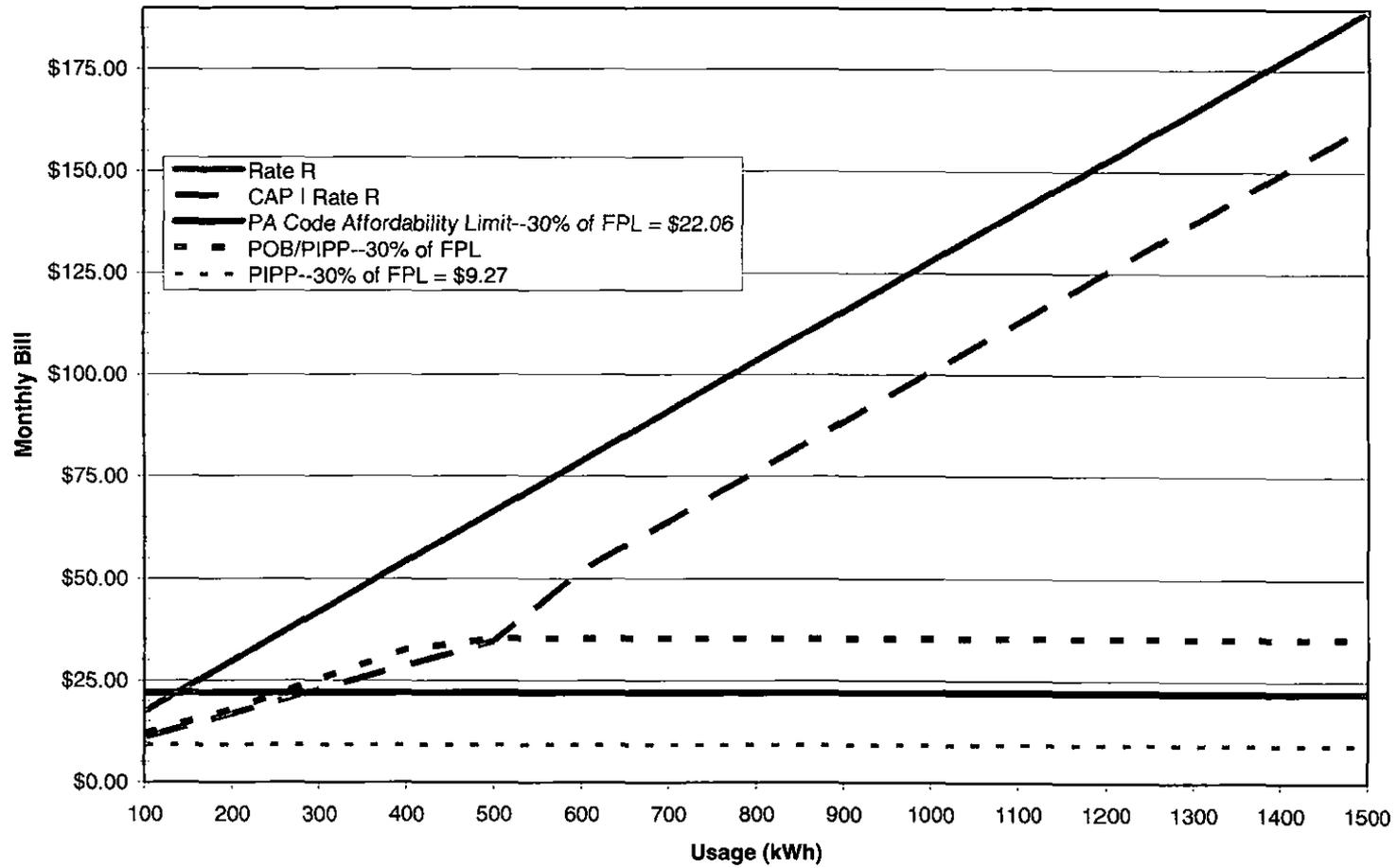
**Family Size of Four--Winter Rate R Comparison Chart
50% of Federal Poverty Level**



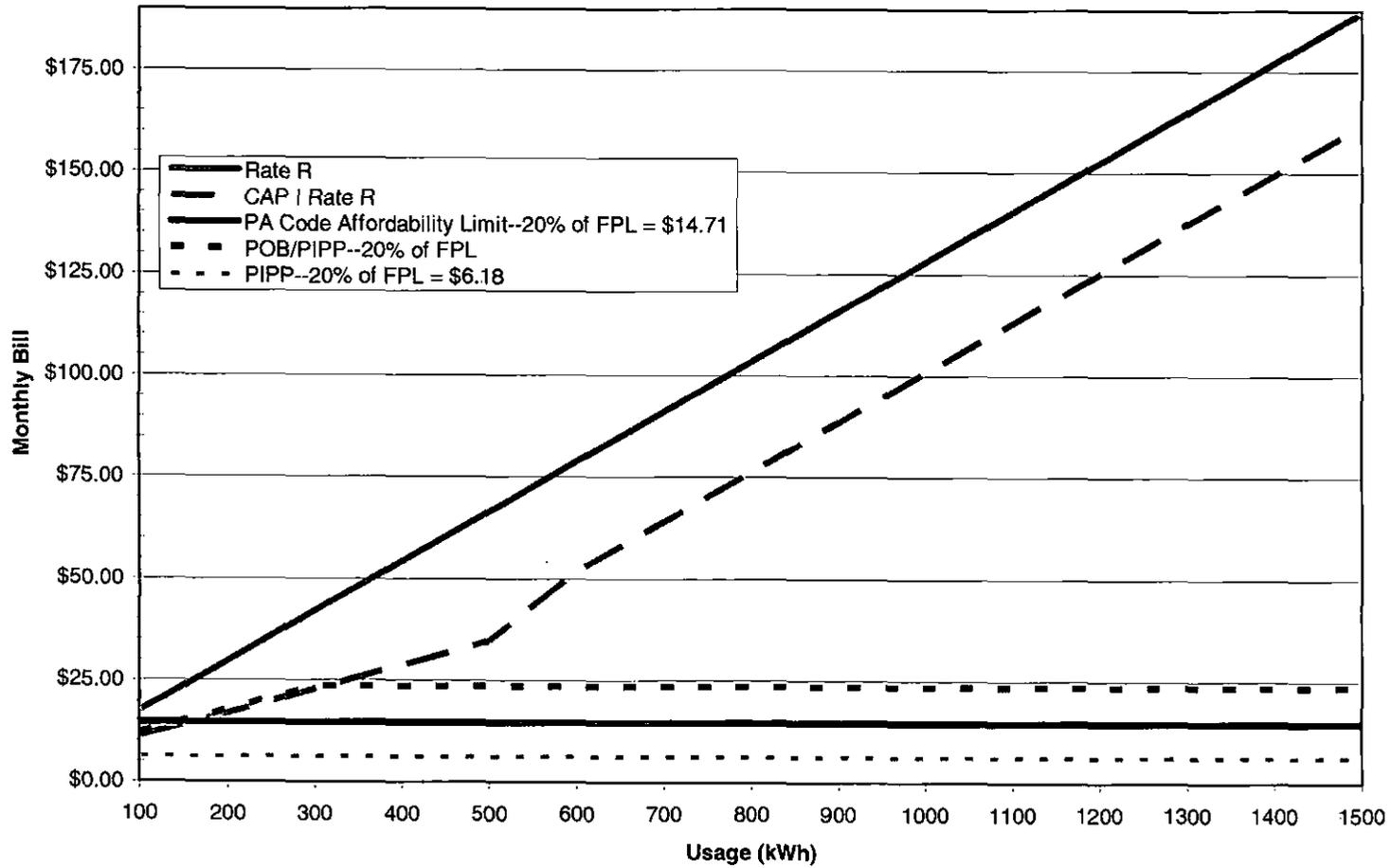
**Family Size of Four--Winter Rate R Comparison Chart
40% of Federal Poverty Level**



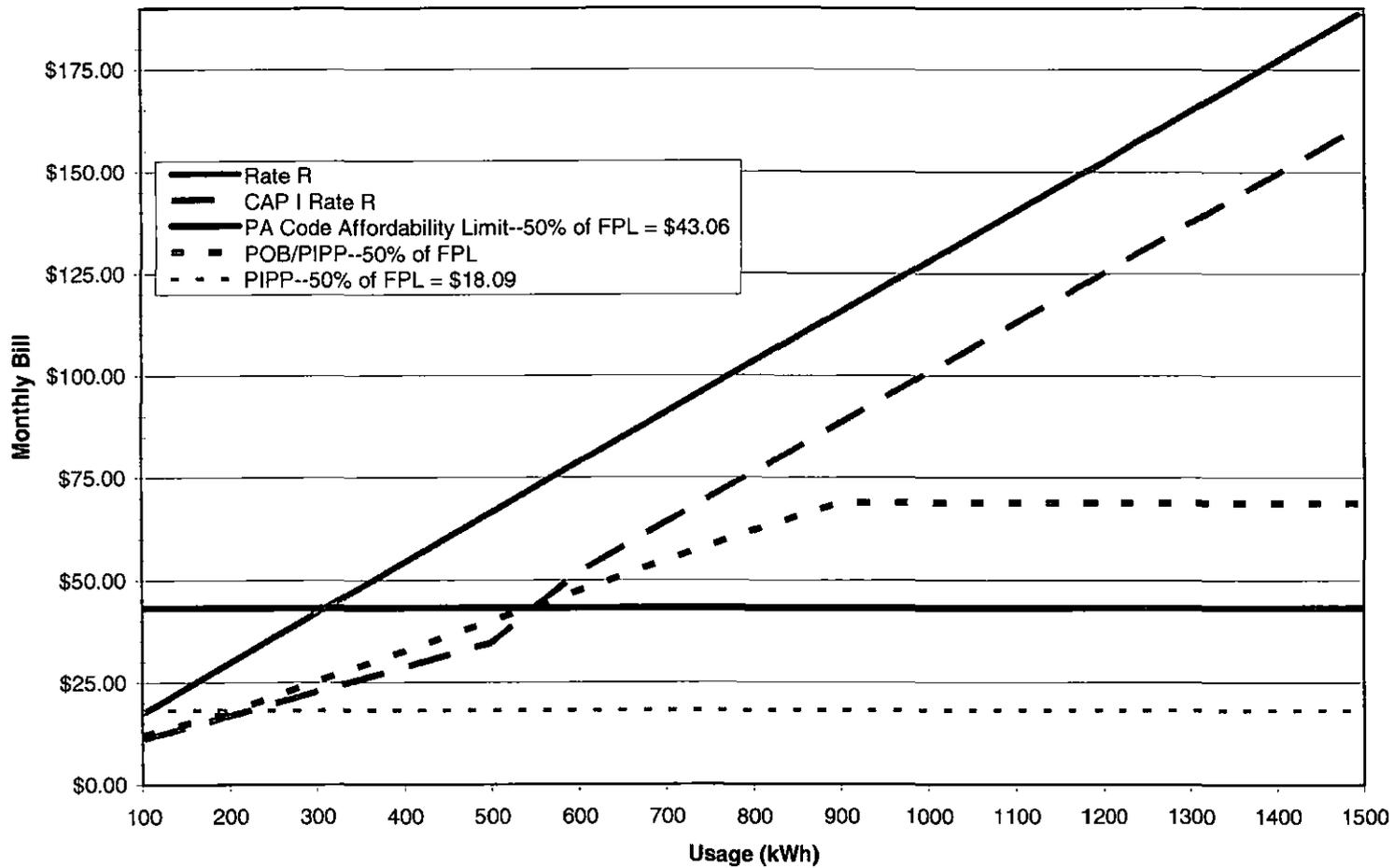
**Family Size of Four--Winter Rate R Comparison Chart
30% of Federal Poverty Level**



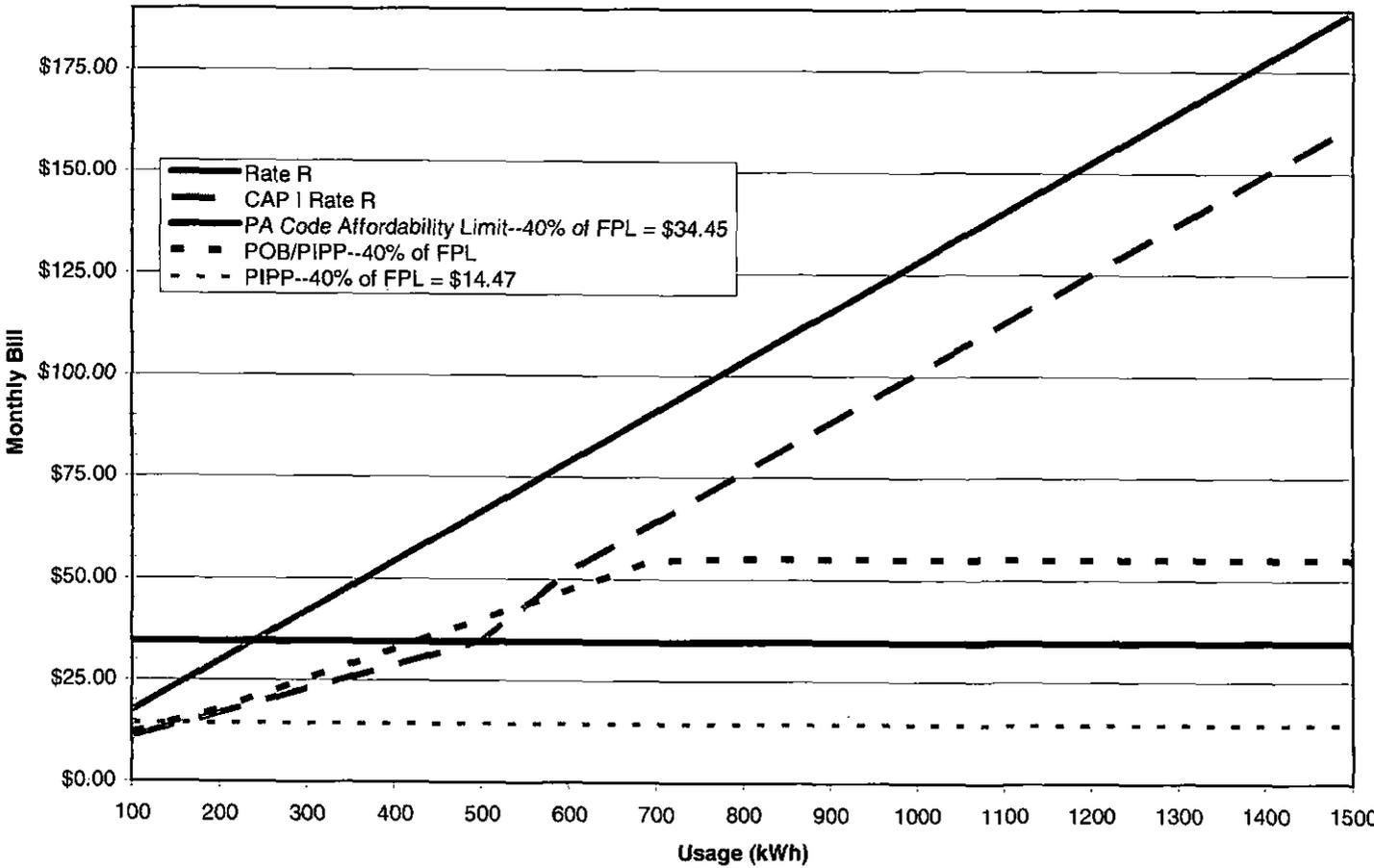
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20% of Federal Poverty Level**



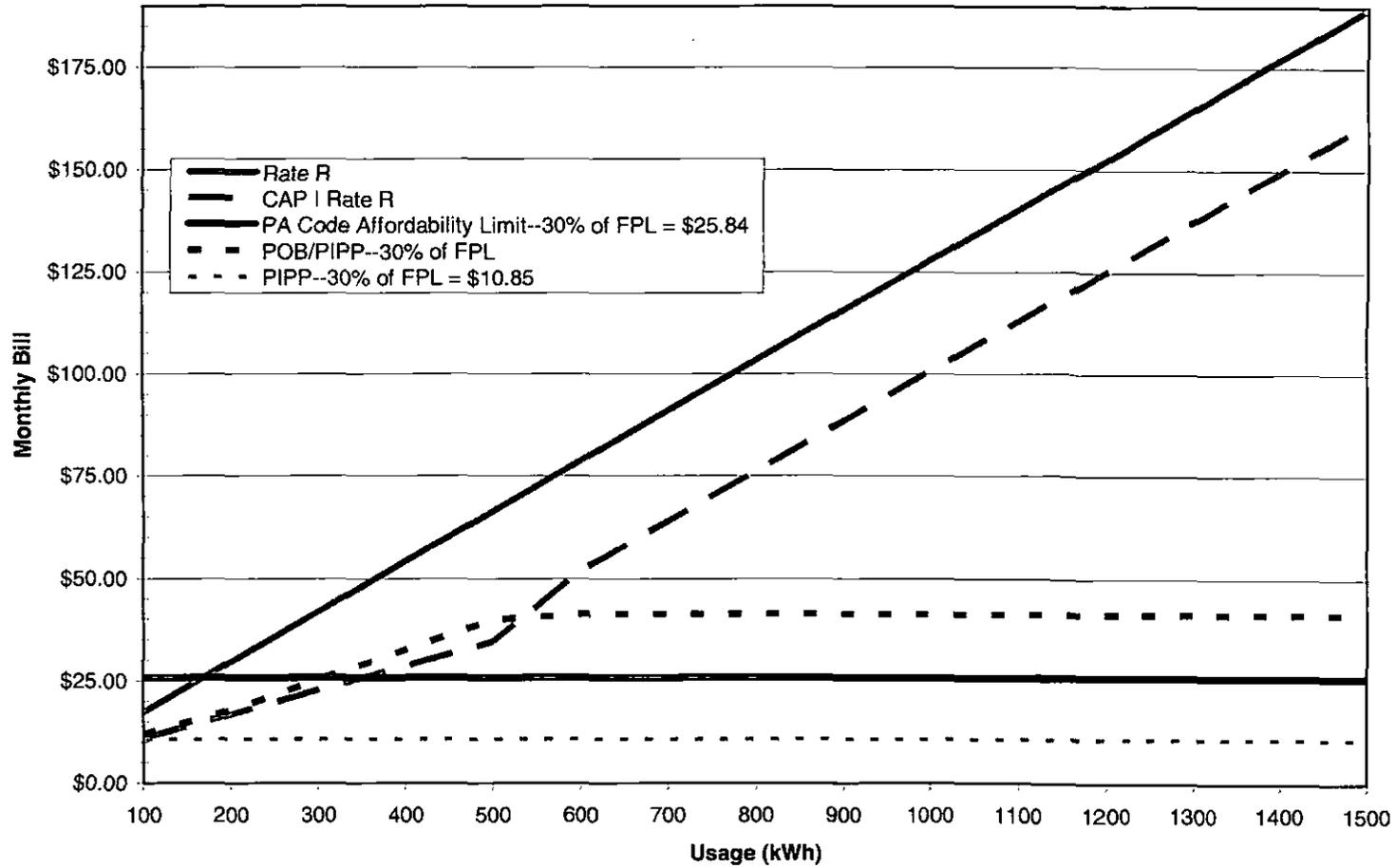
**Family Size of Five--Winter Rate R Comparison Chart
50% of Federal Poverty Level**



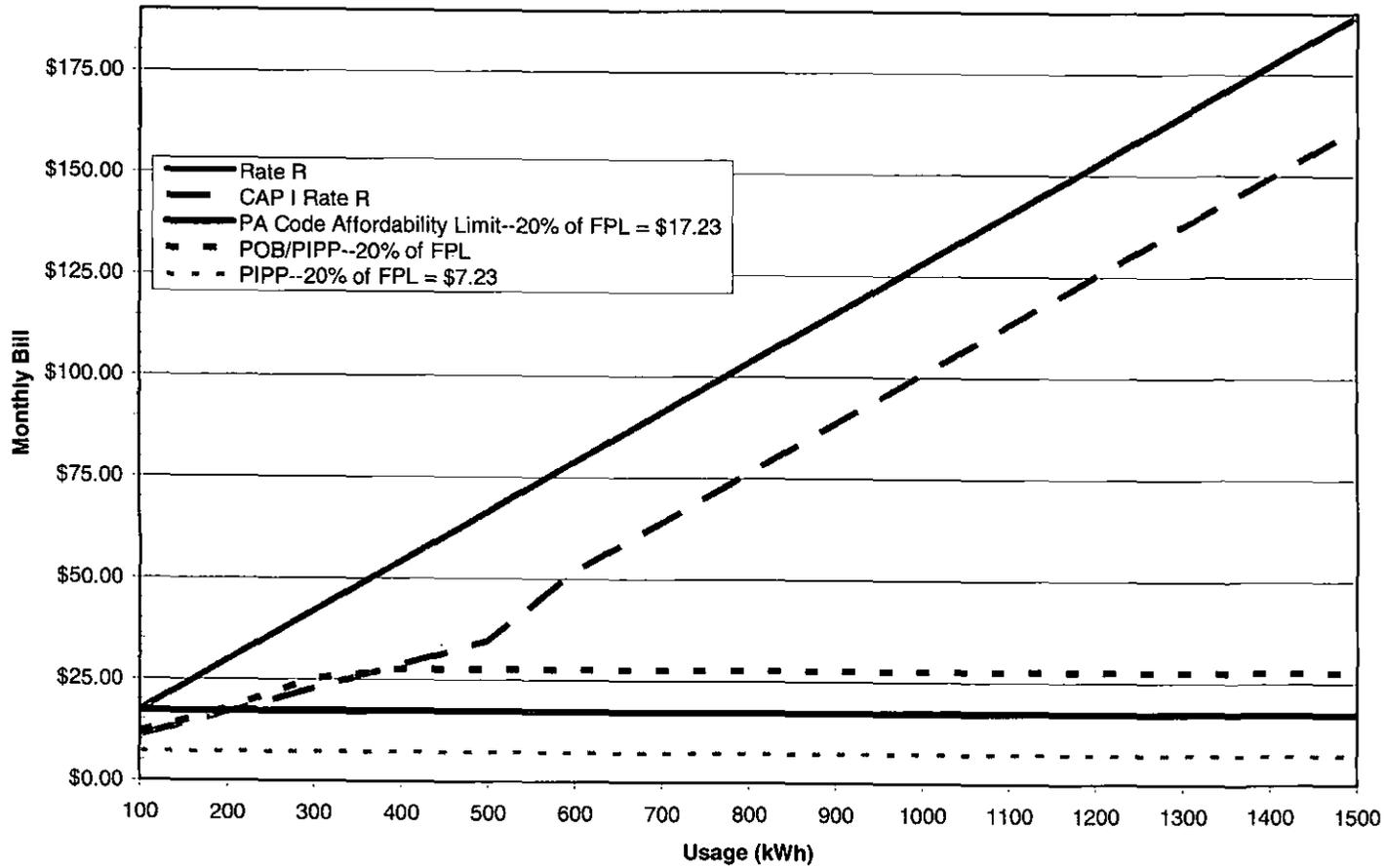
**Family Size of Five--Winter Rate R Comparison Chart
40% of Federal Poverty Level**



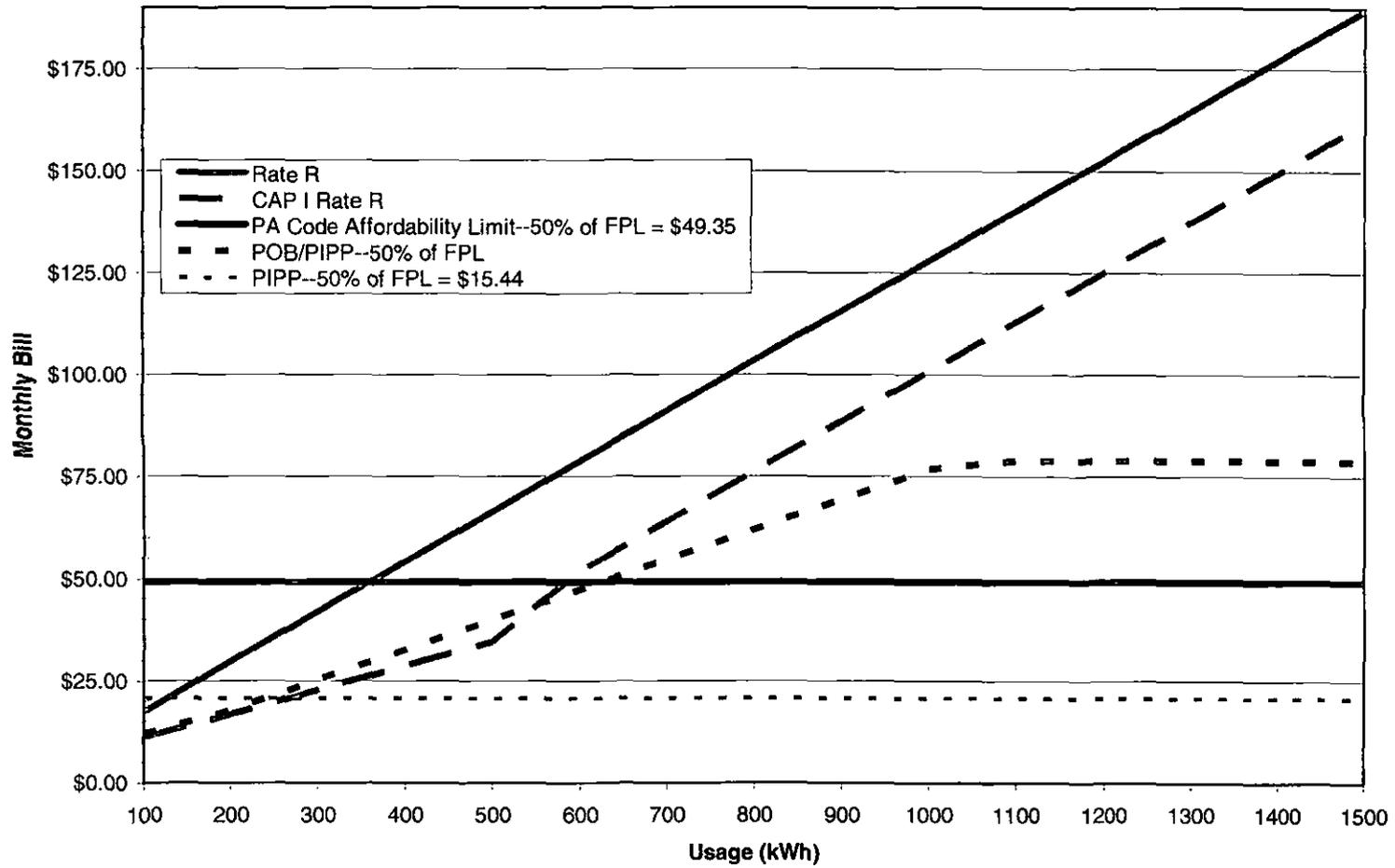
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30% of Federal Poverty Level**



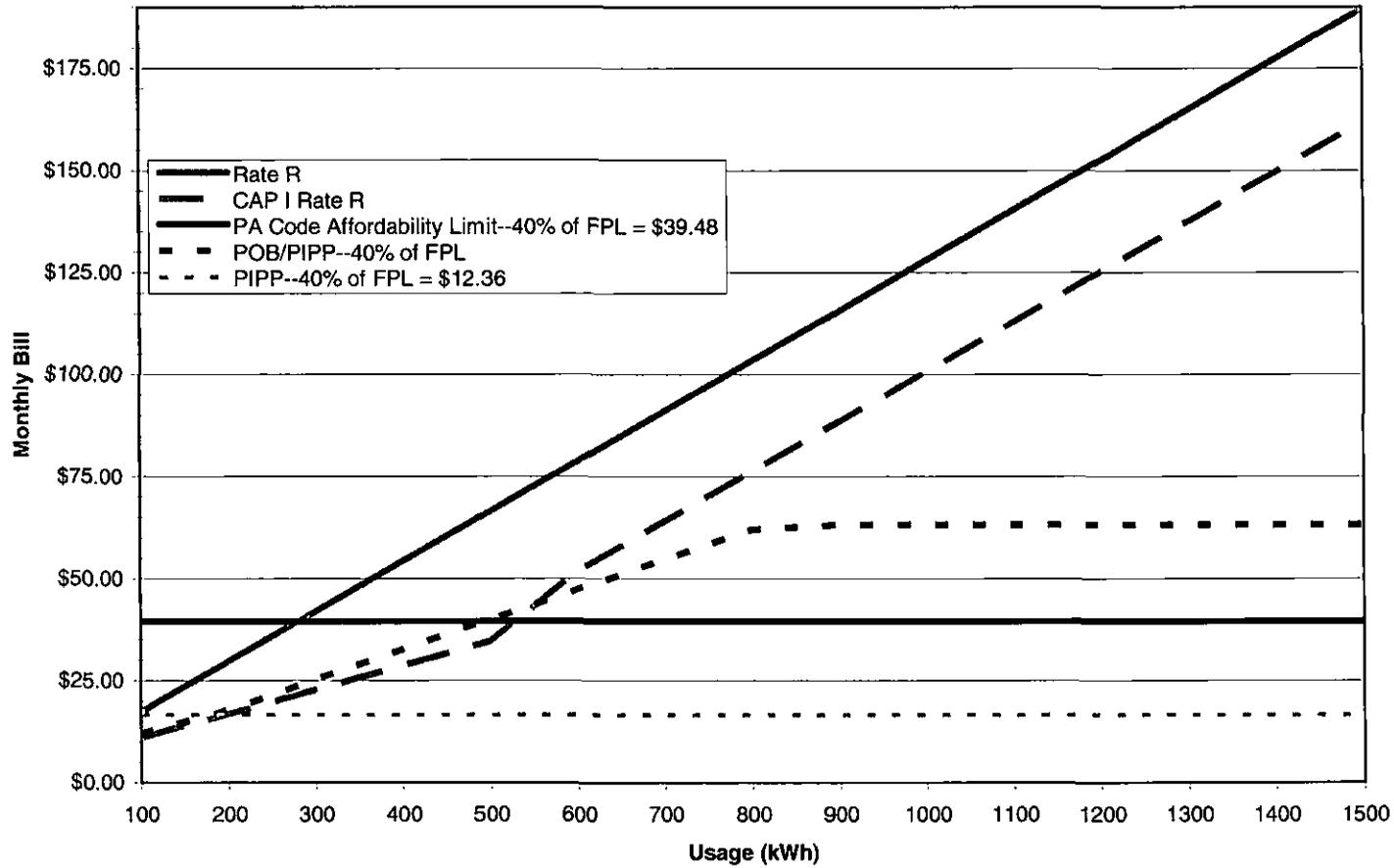
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20% of Federal Poverty Level**



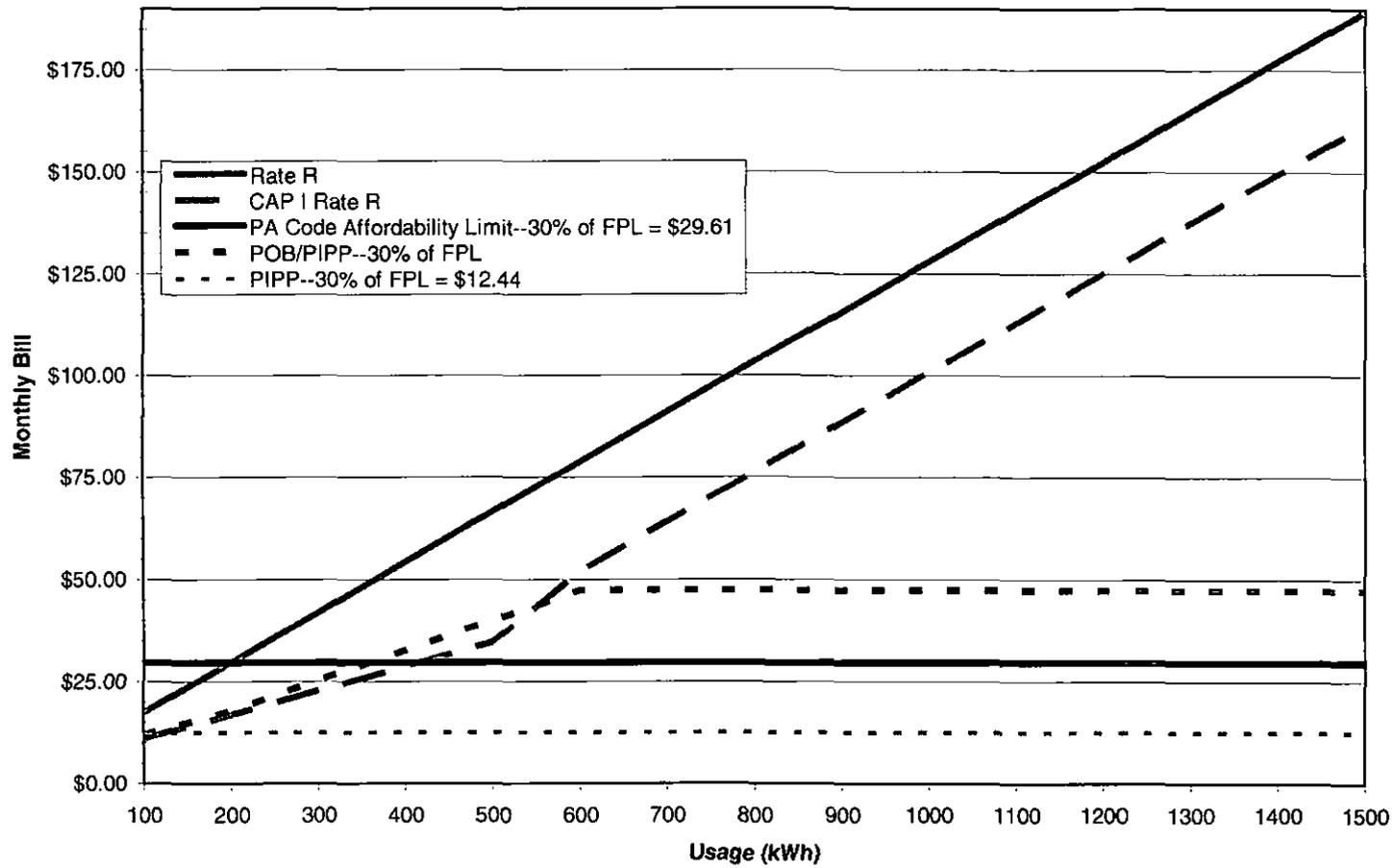
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50% of Federal Poverty Level**



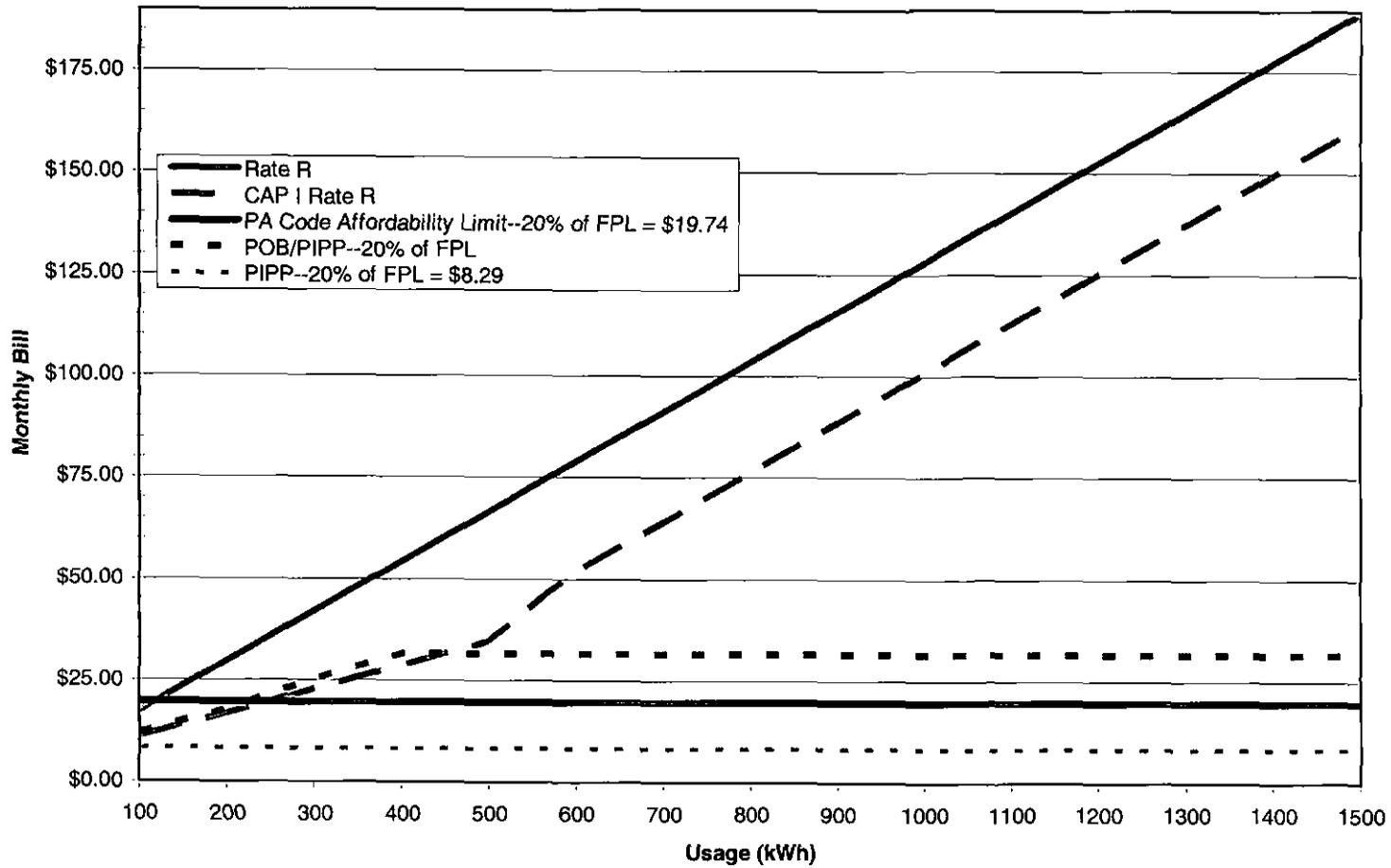
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40% of Federal Poverty Level**



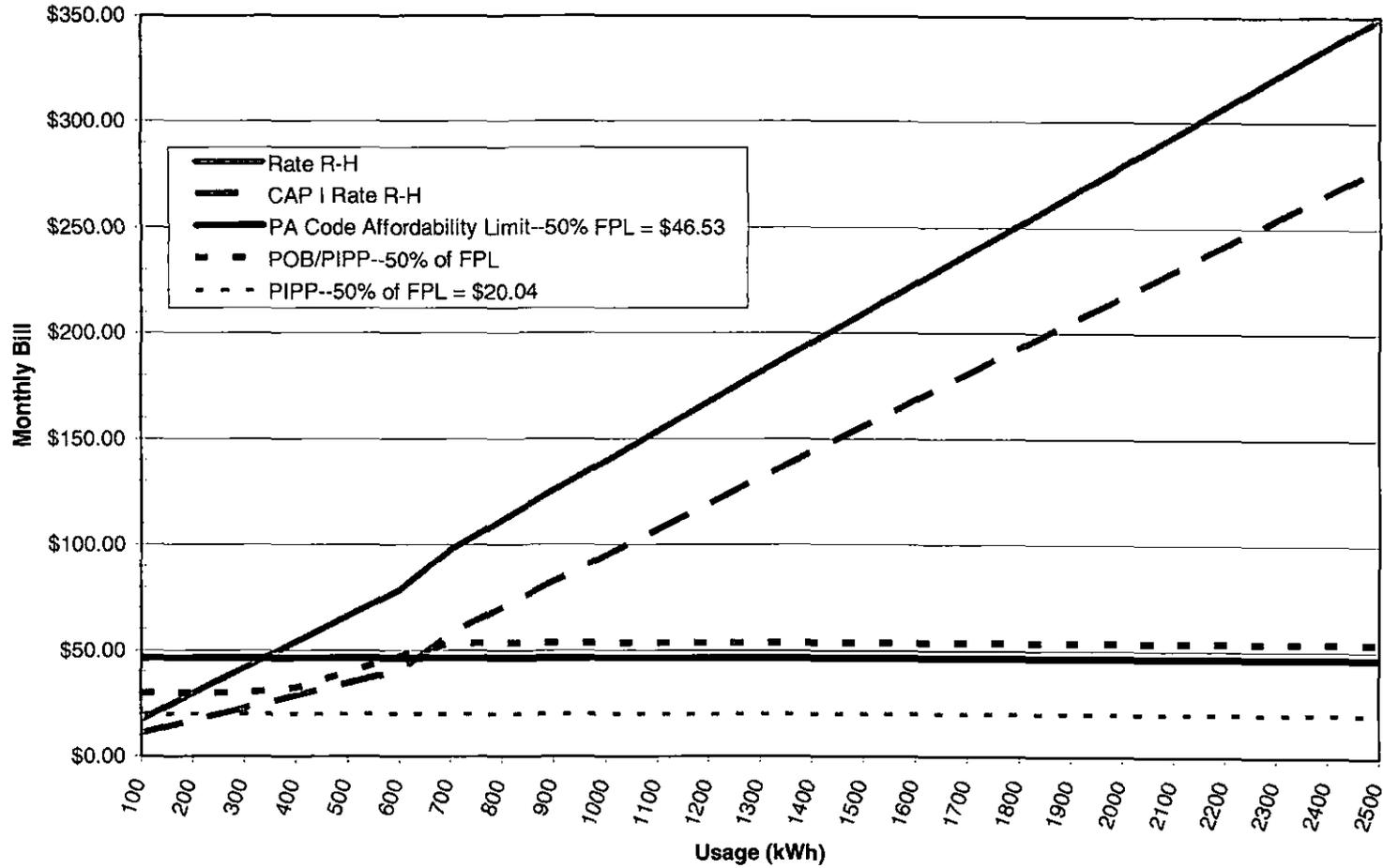
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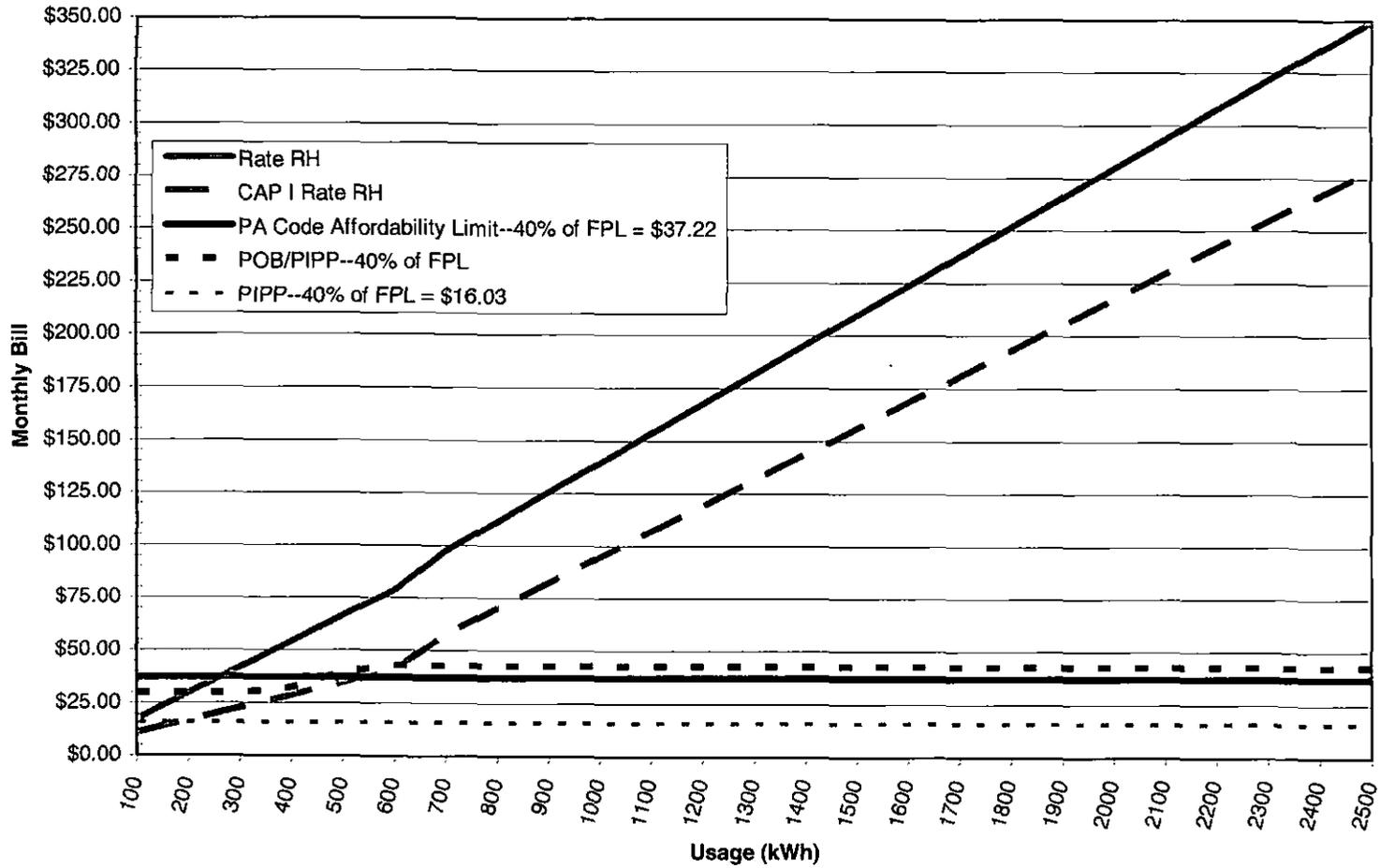
**Family Size of Six--Winter Rate R Comparison Chart
20% of Federal Poverty Level**



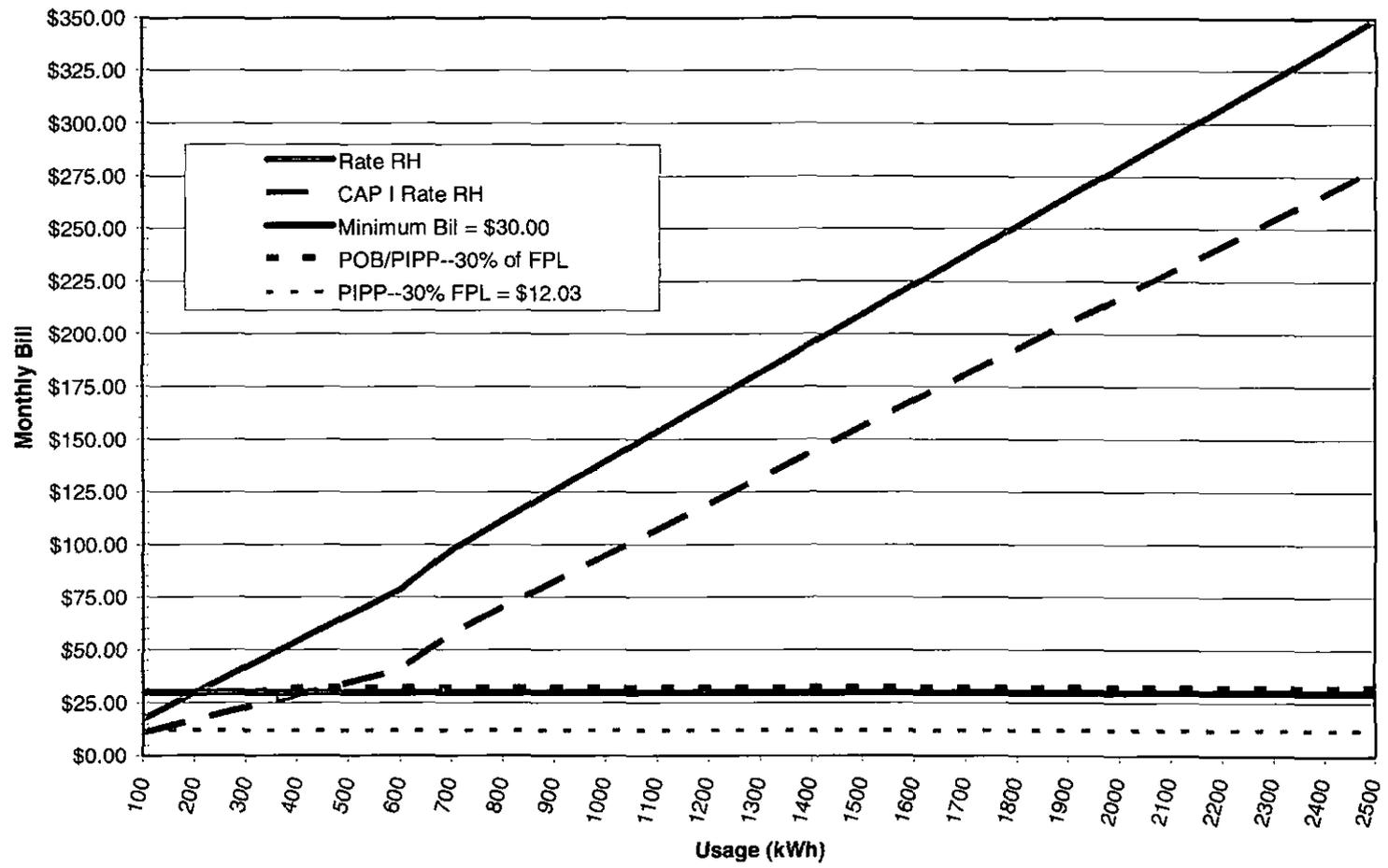
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50% of Federal Poverty Level**



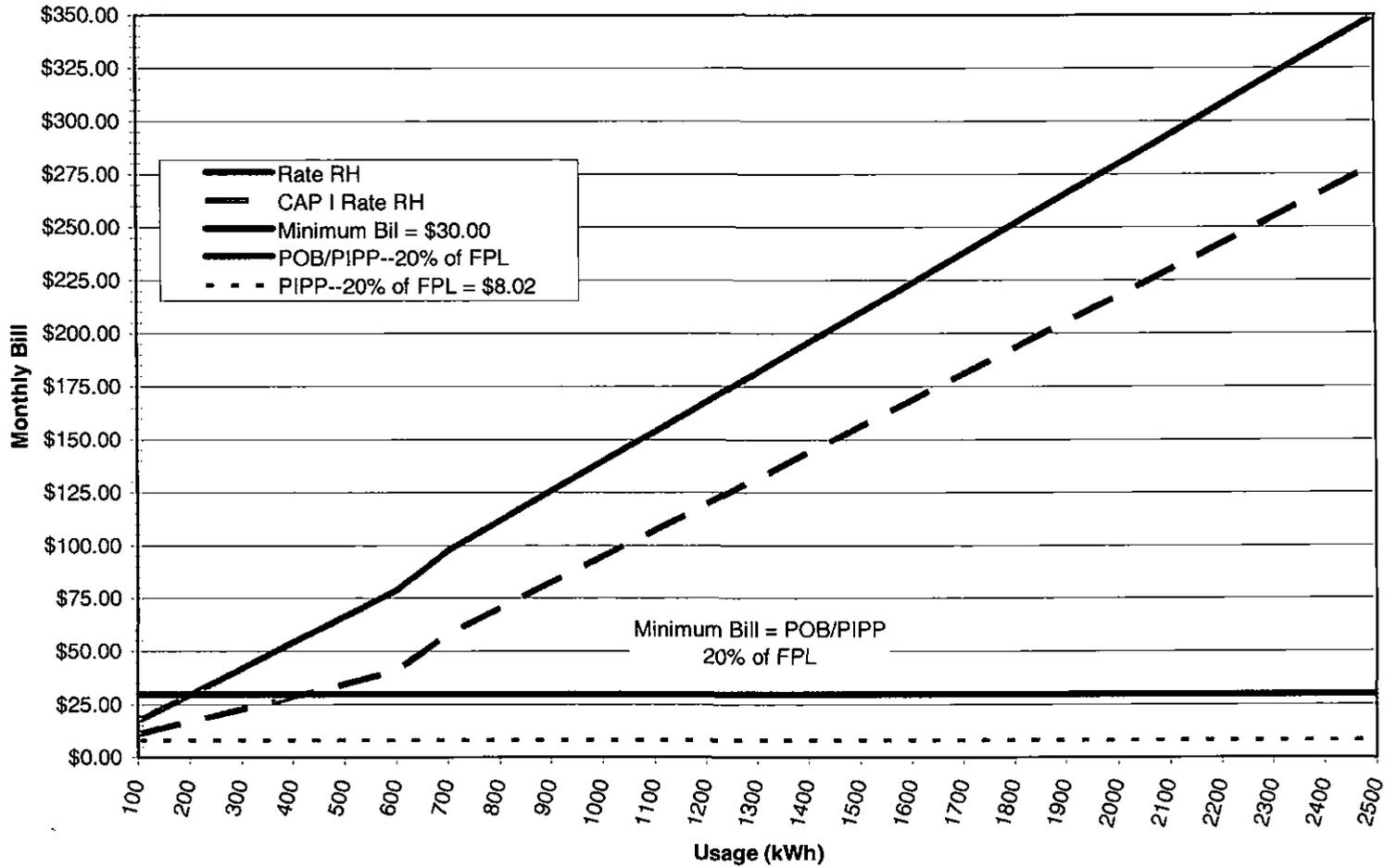
**Family Size of One--Summer Rate RH Comparison Chart
40% of Federal Poverty Level**



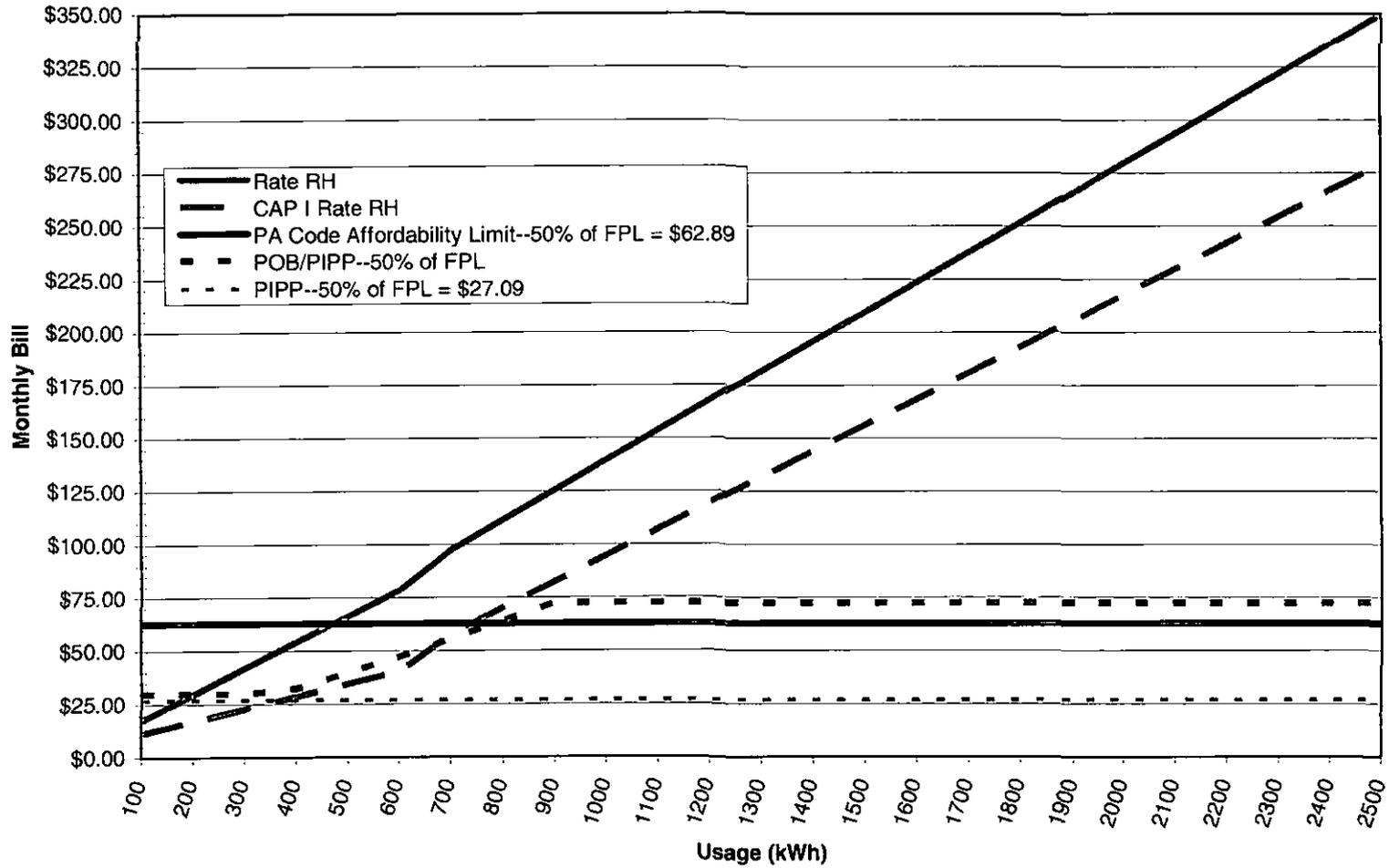
**Family Size of One--Summer Rate RH Comparison Chart
30% of Federal Poverty Level**



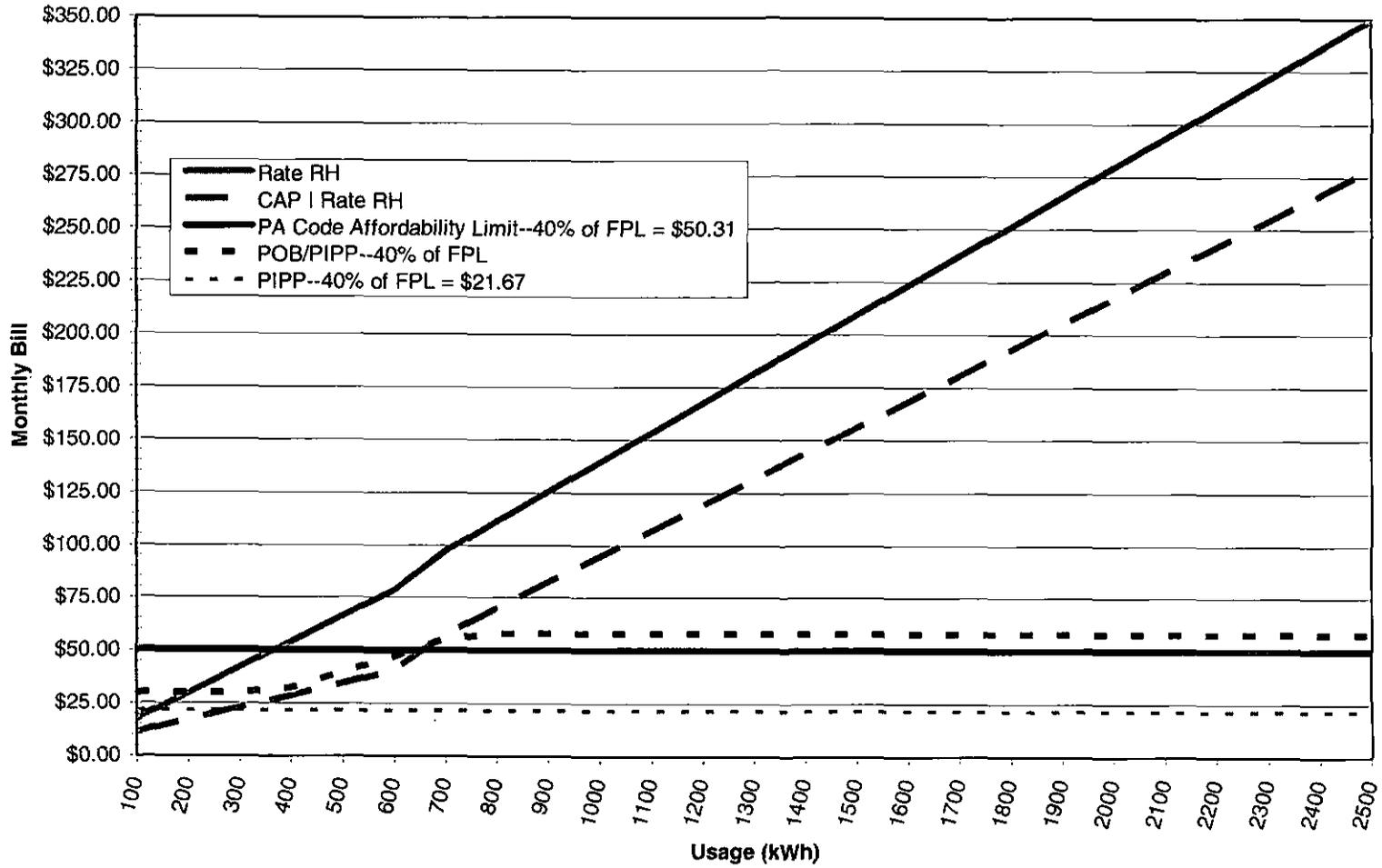
**Family Size of One--Summer Rate RH Comparison Chart
20% of Federal Poverty Level**



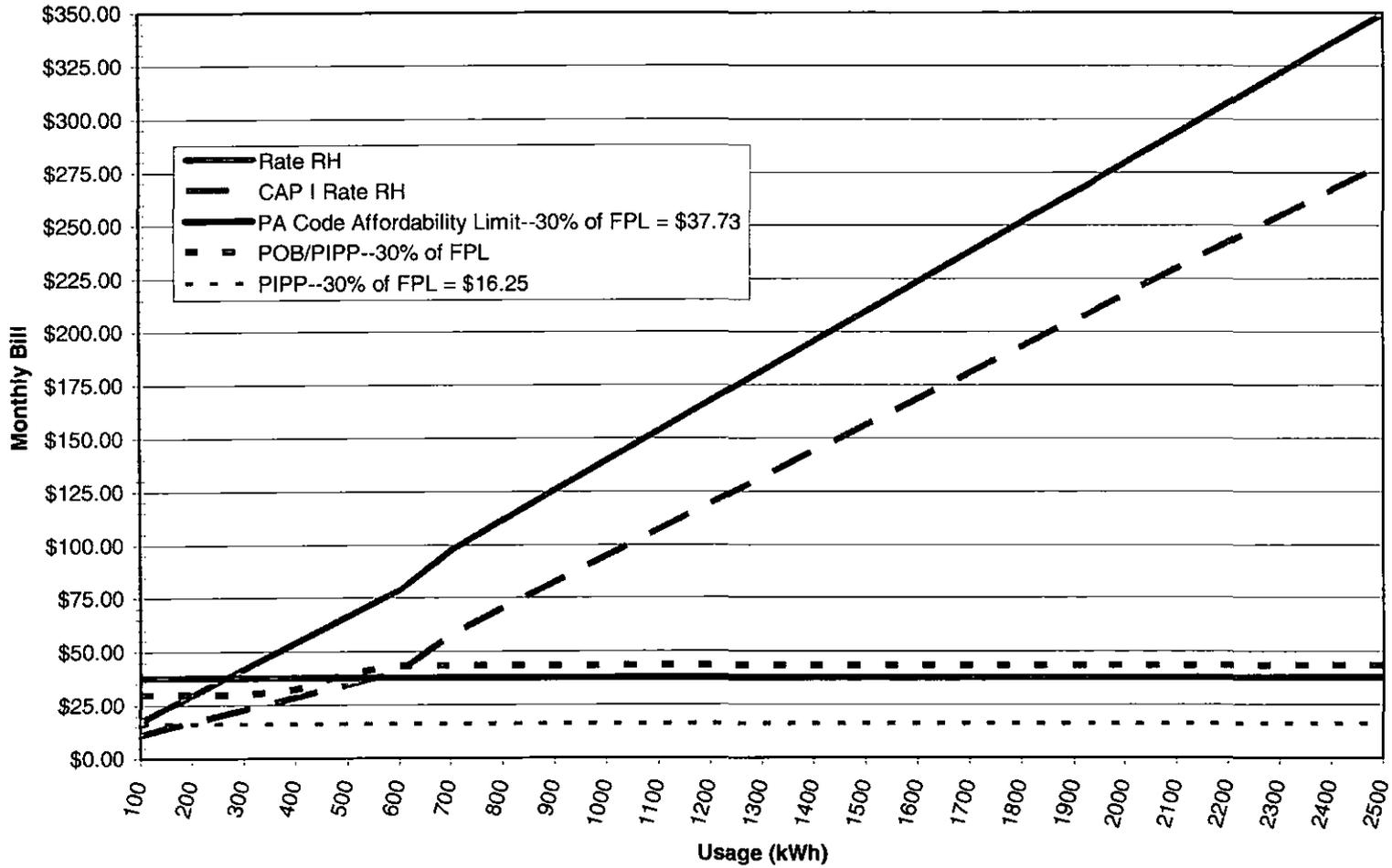
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50% of Federal Poverty Level**



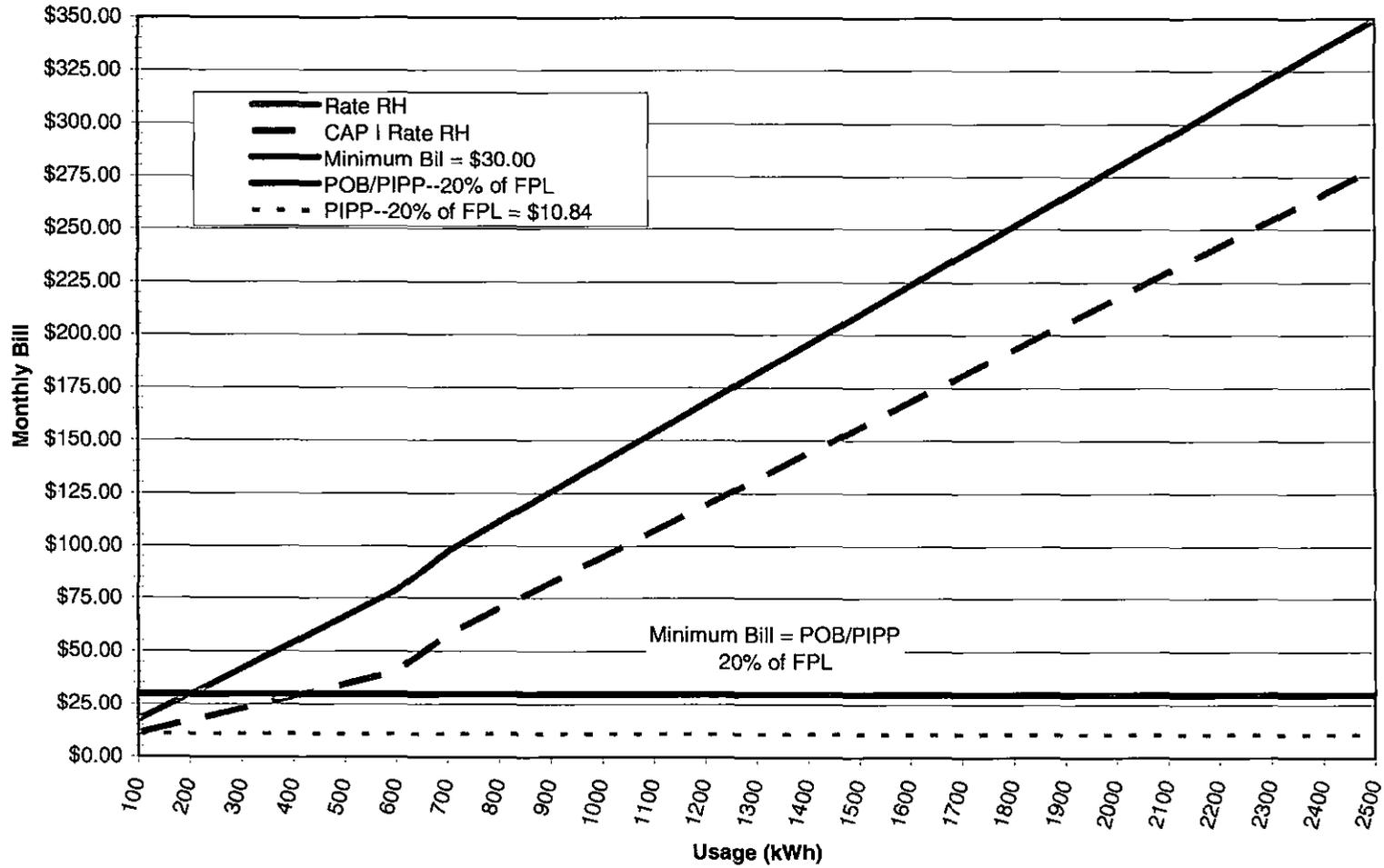
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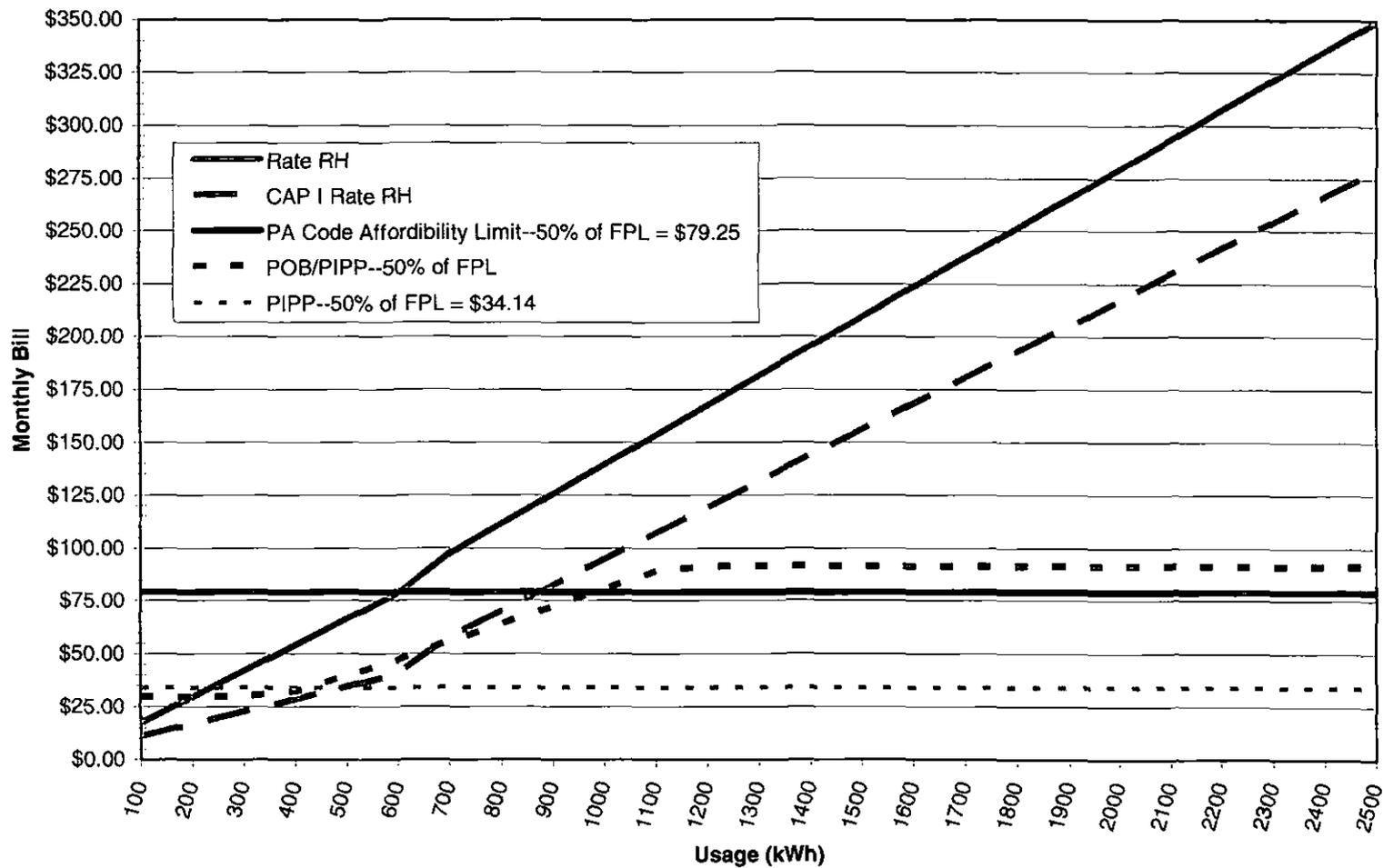
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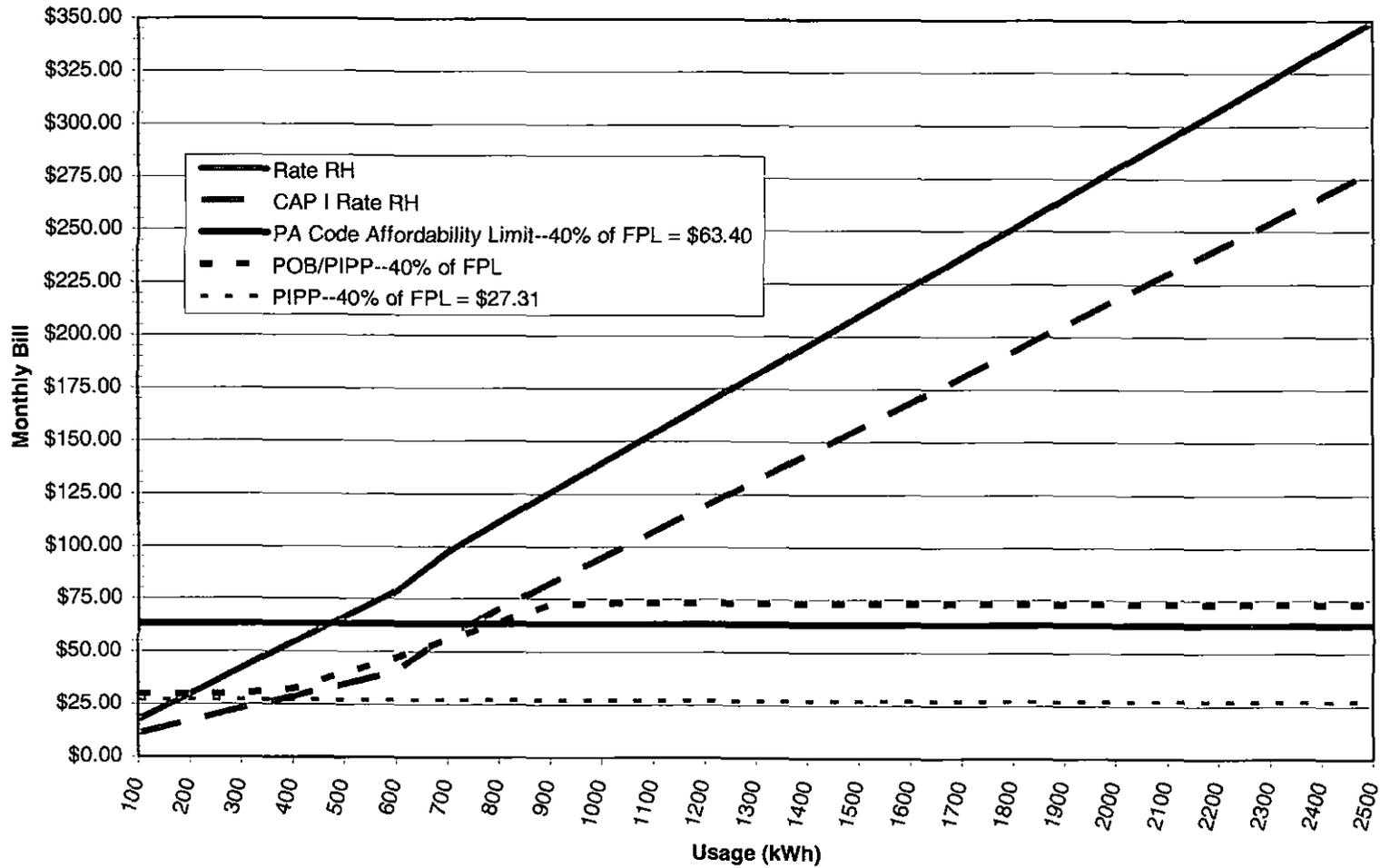
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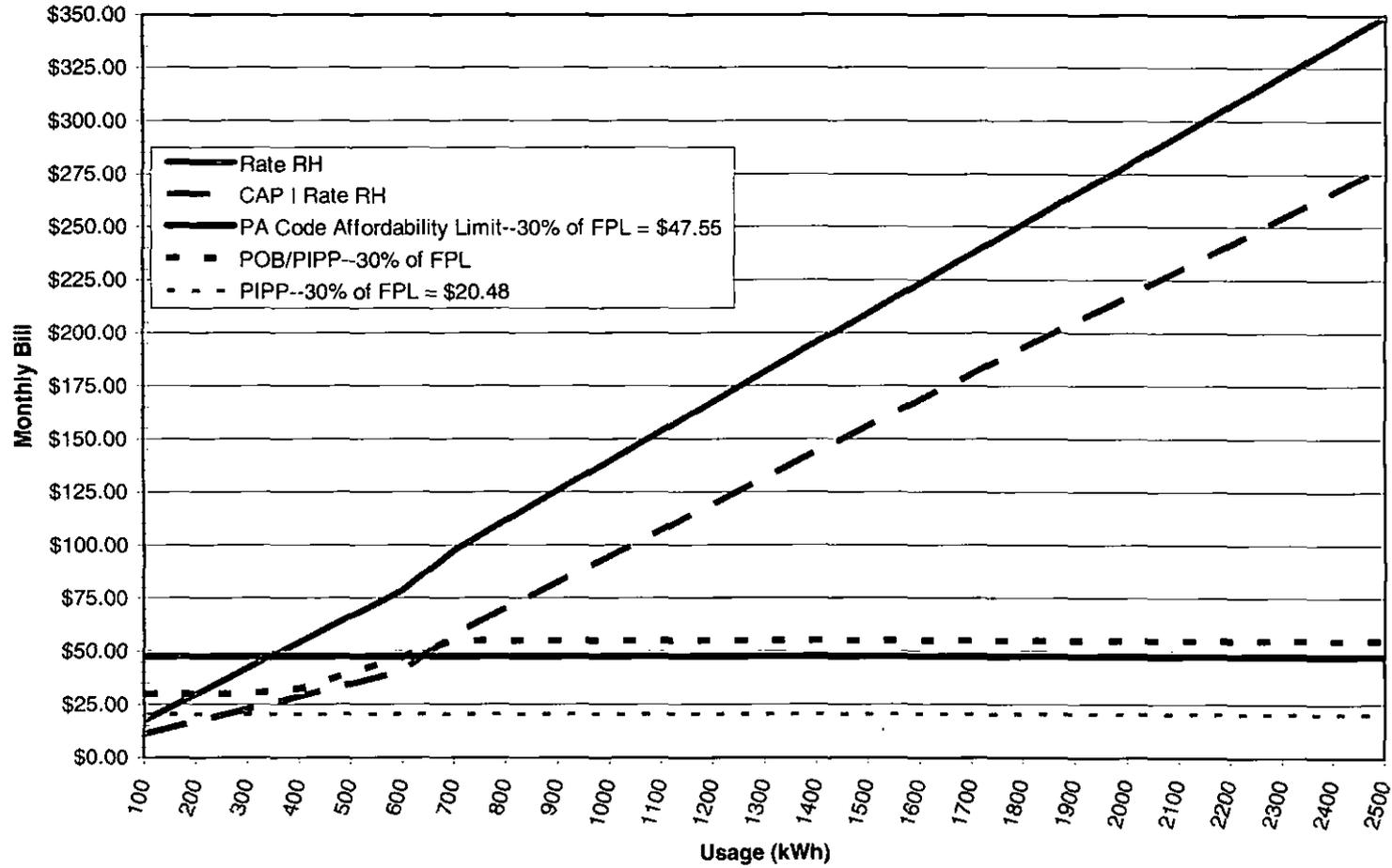
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50% of Federal Poverty Level**



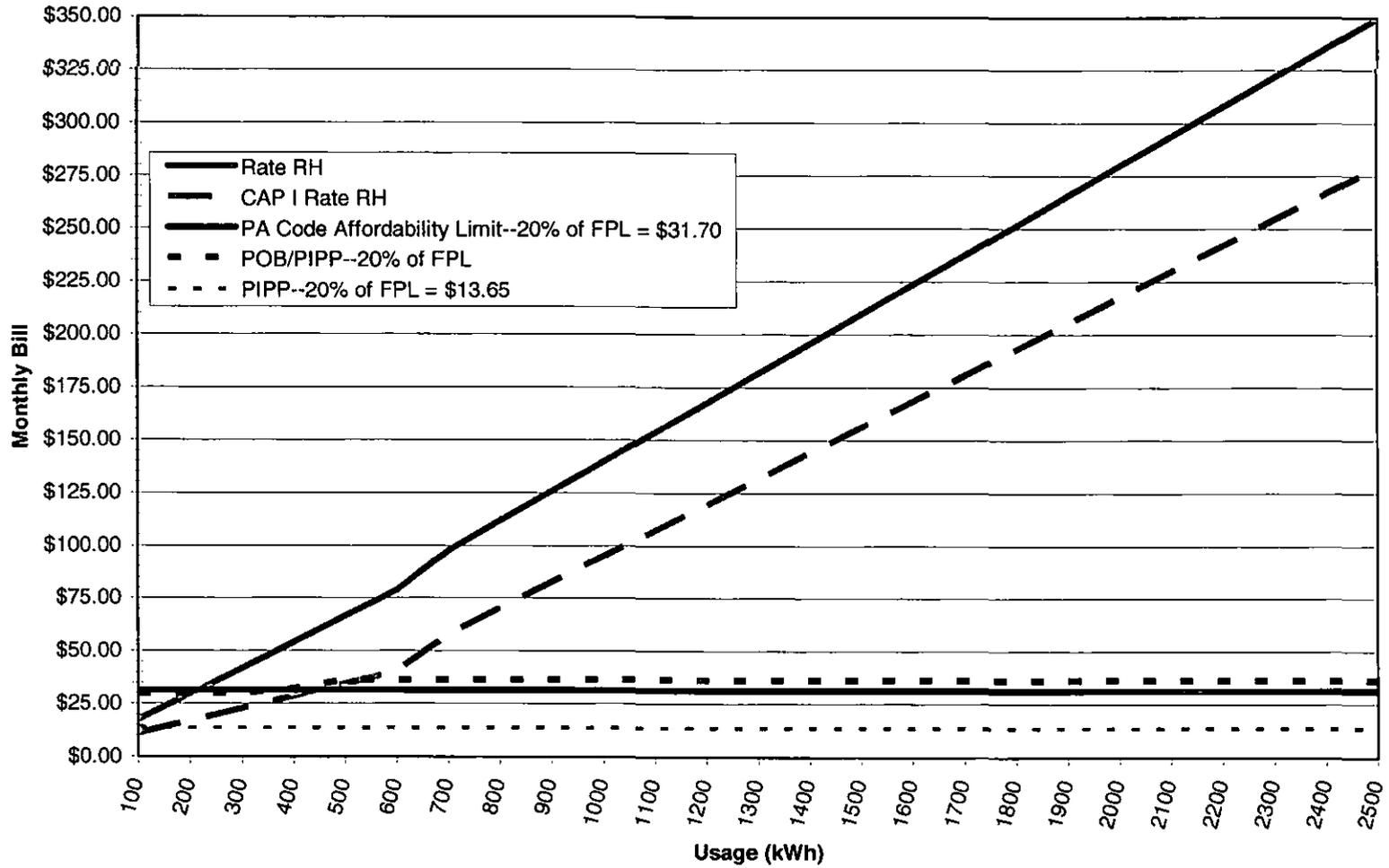
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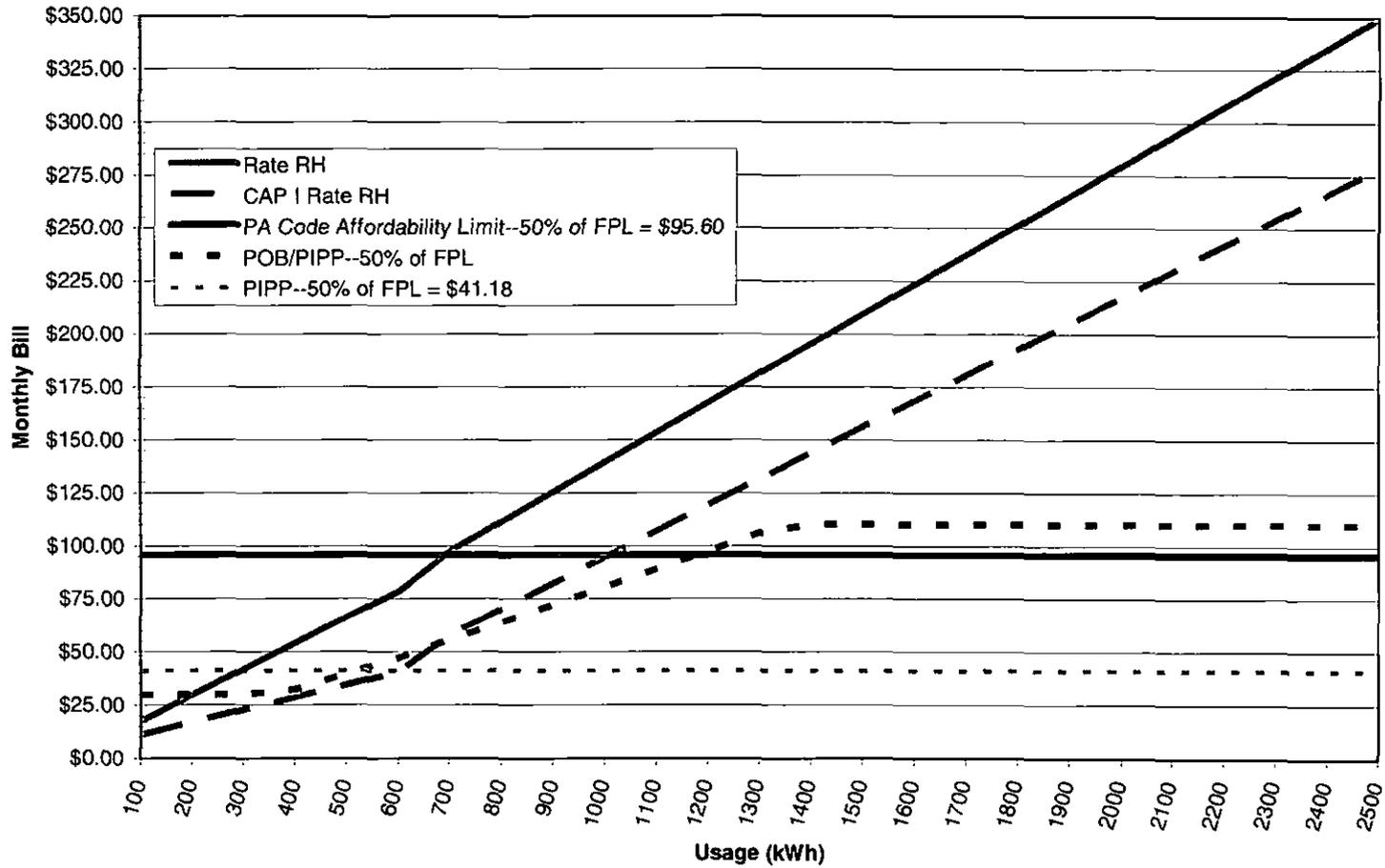
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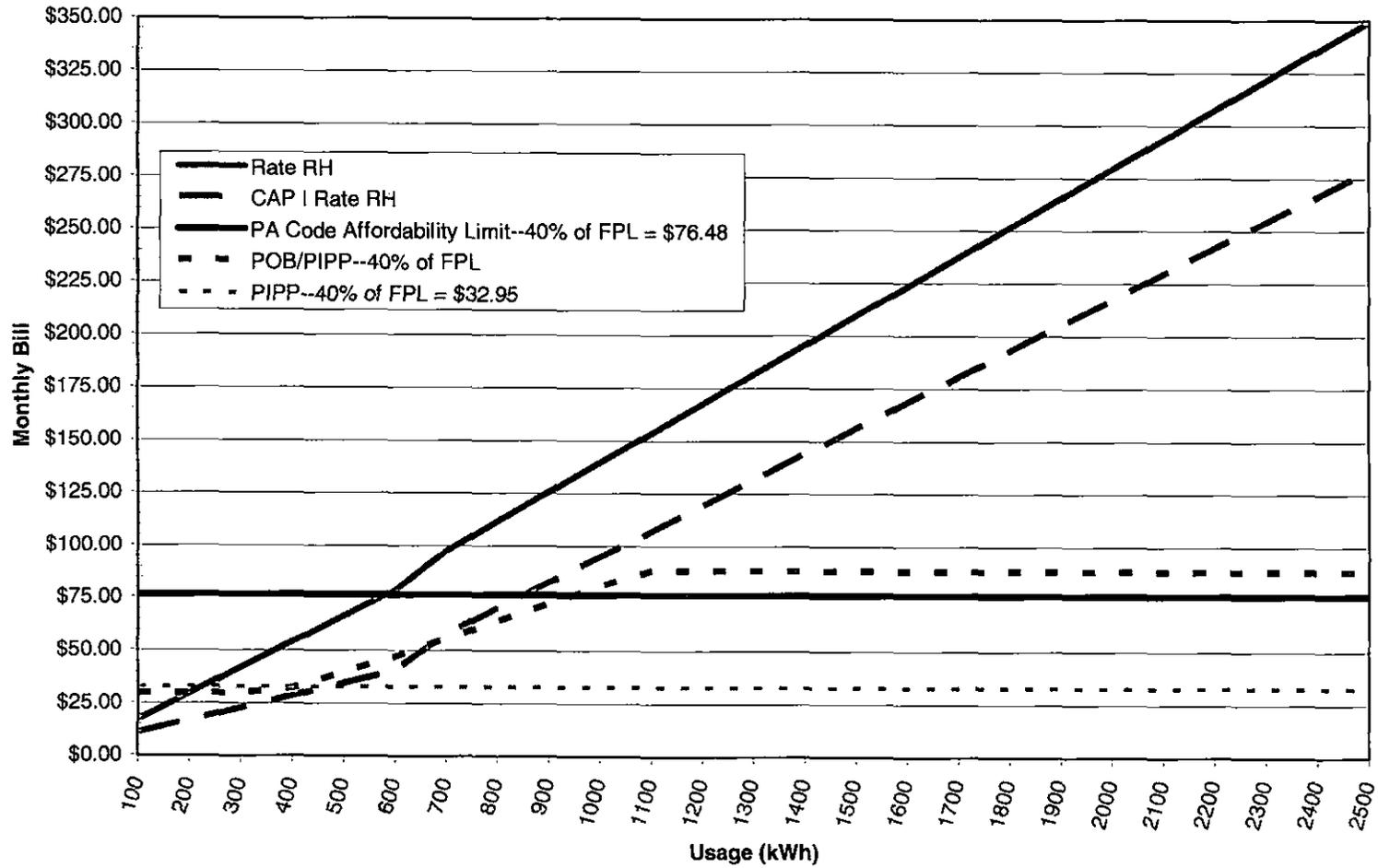
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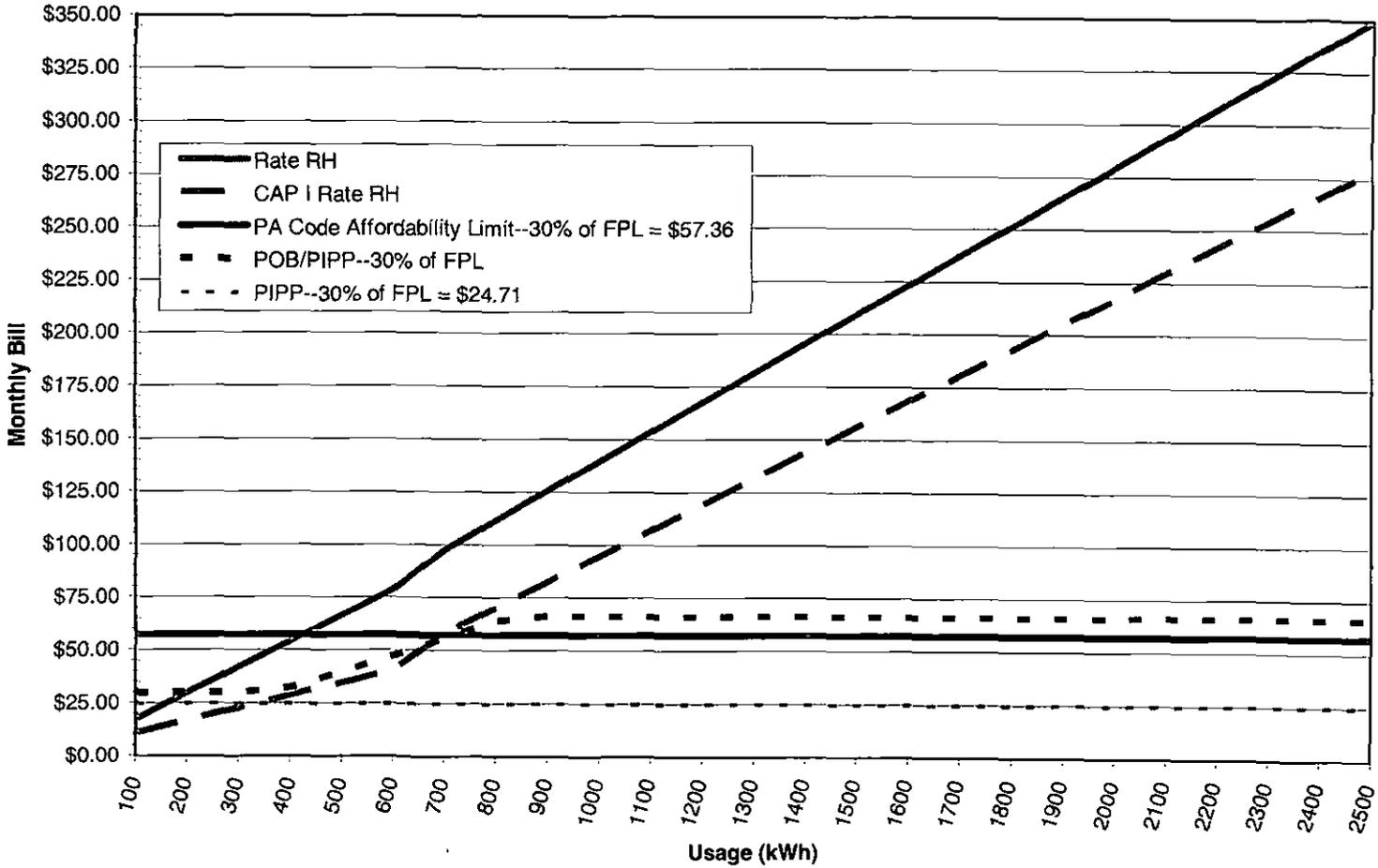
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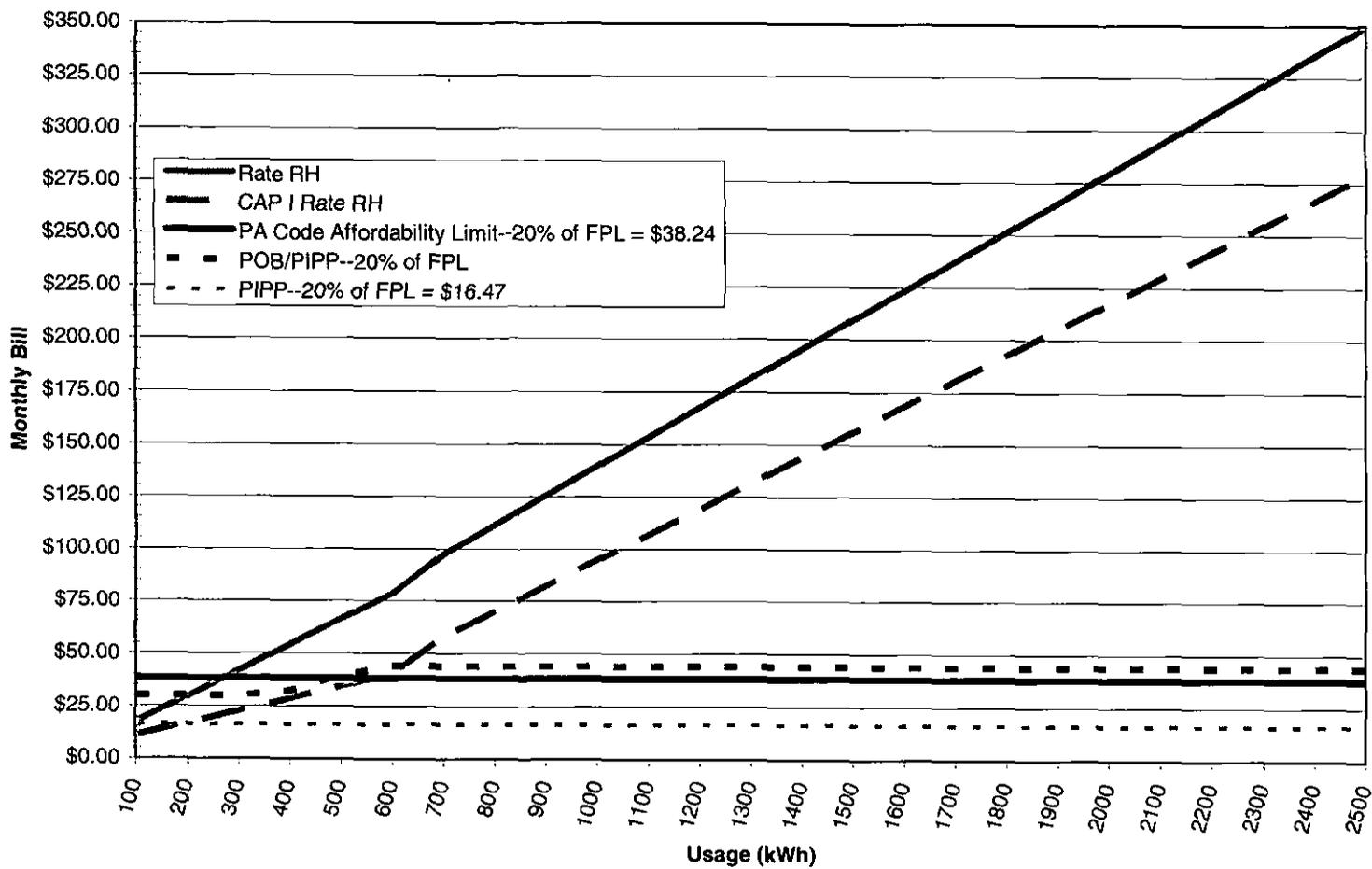
**Family Size of Four--Summer Rate RH Comparison Chart
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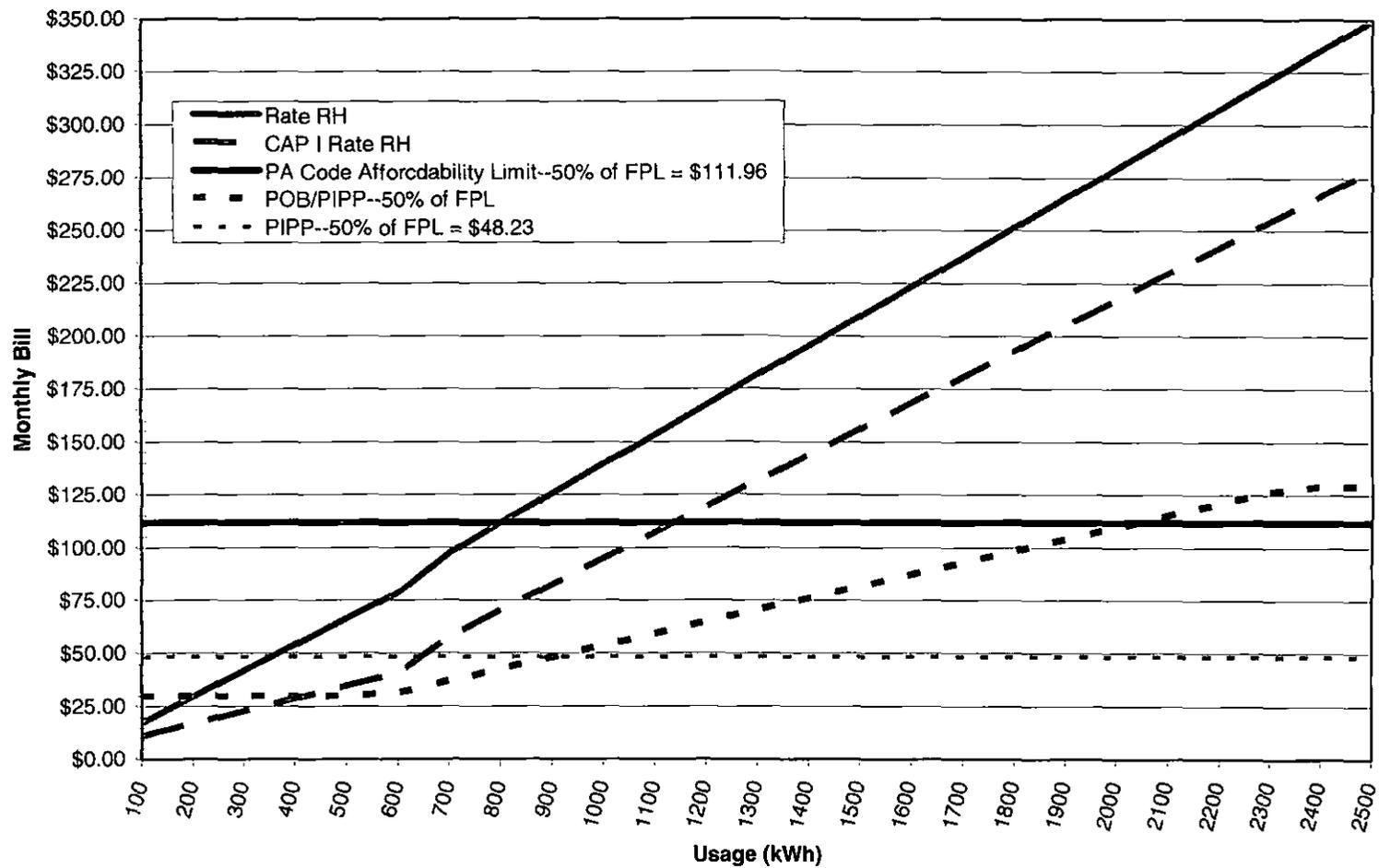
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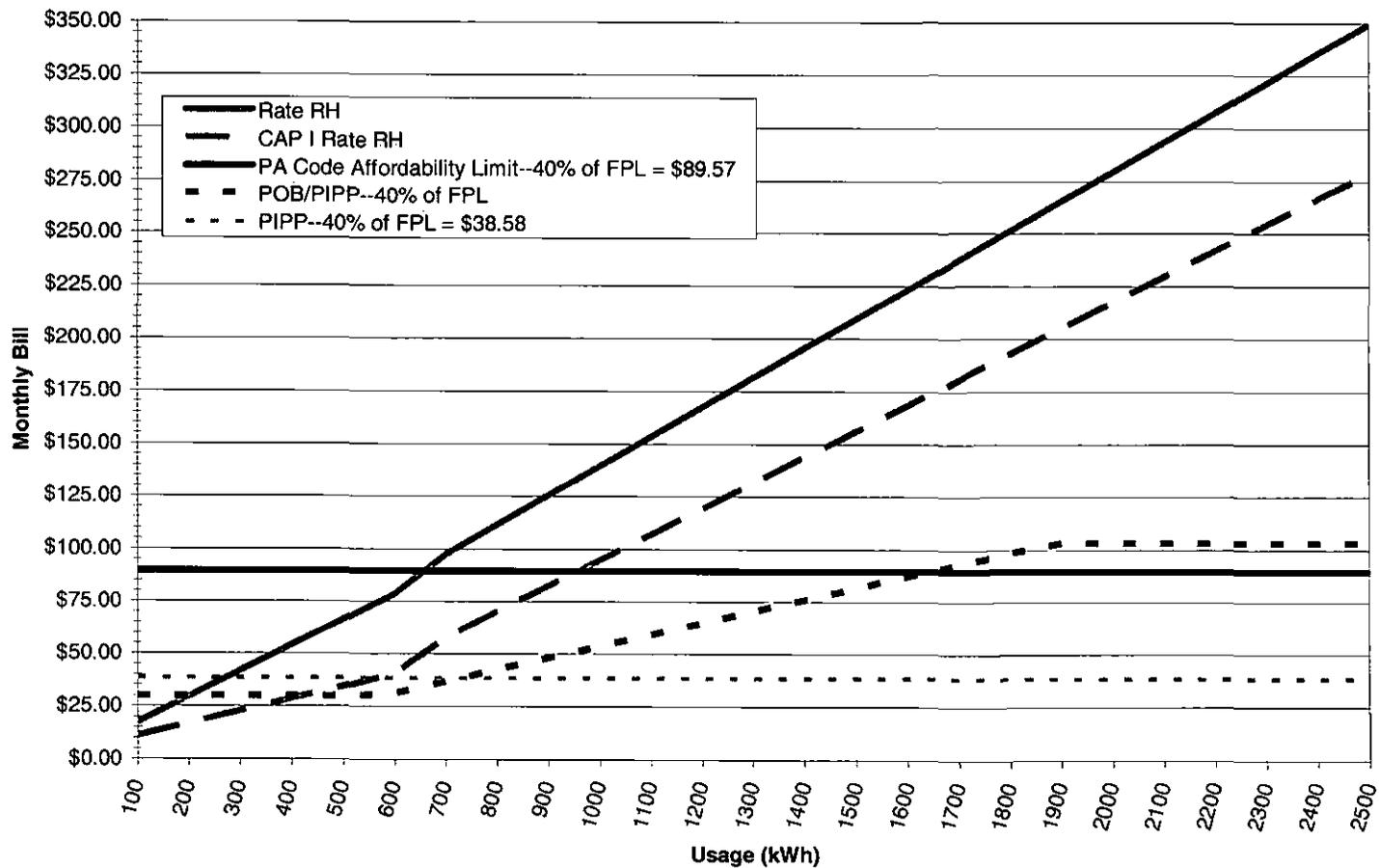
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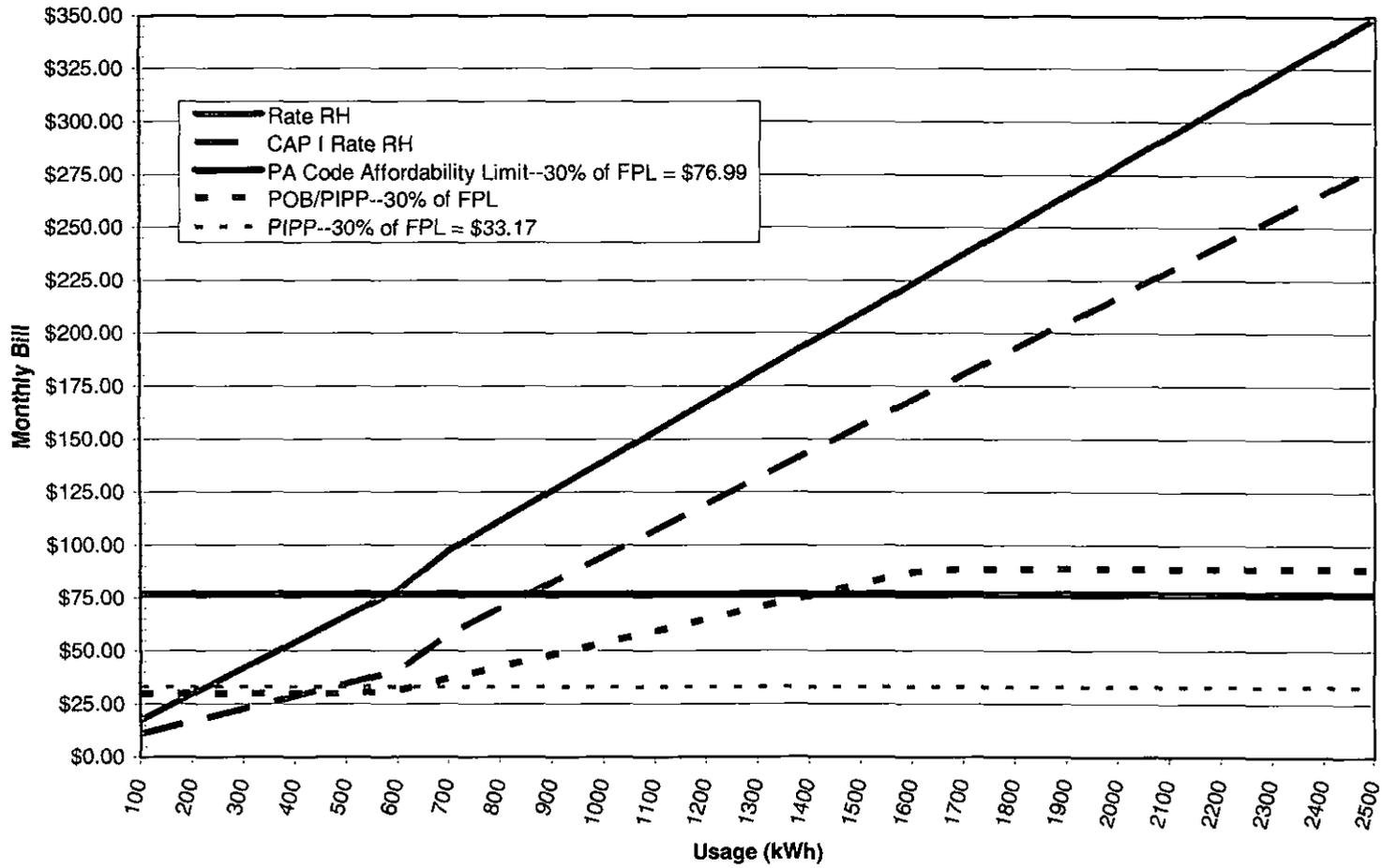
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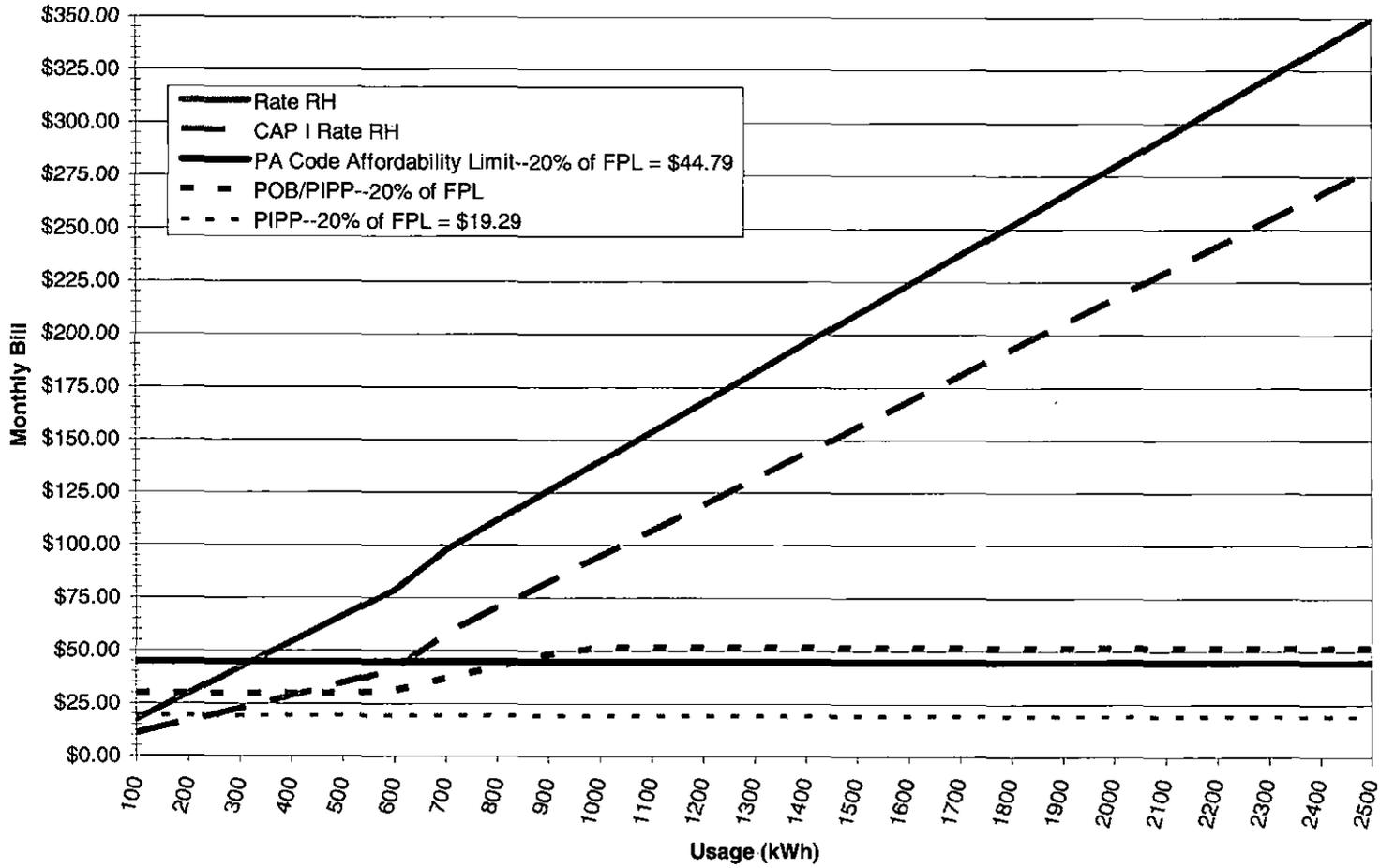
**Family Size of Five--Summer Rate RH Comparison Chart
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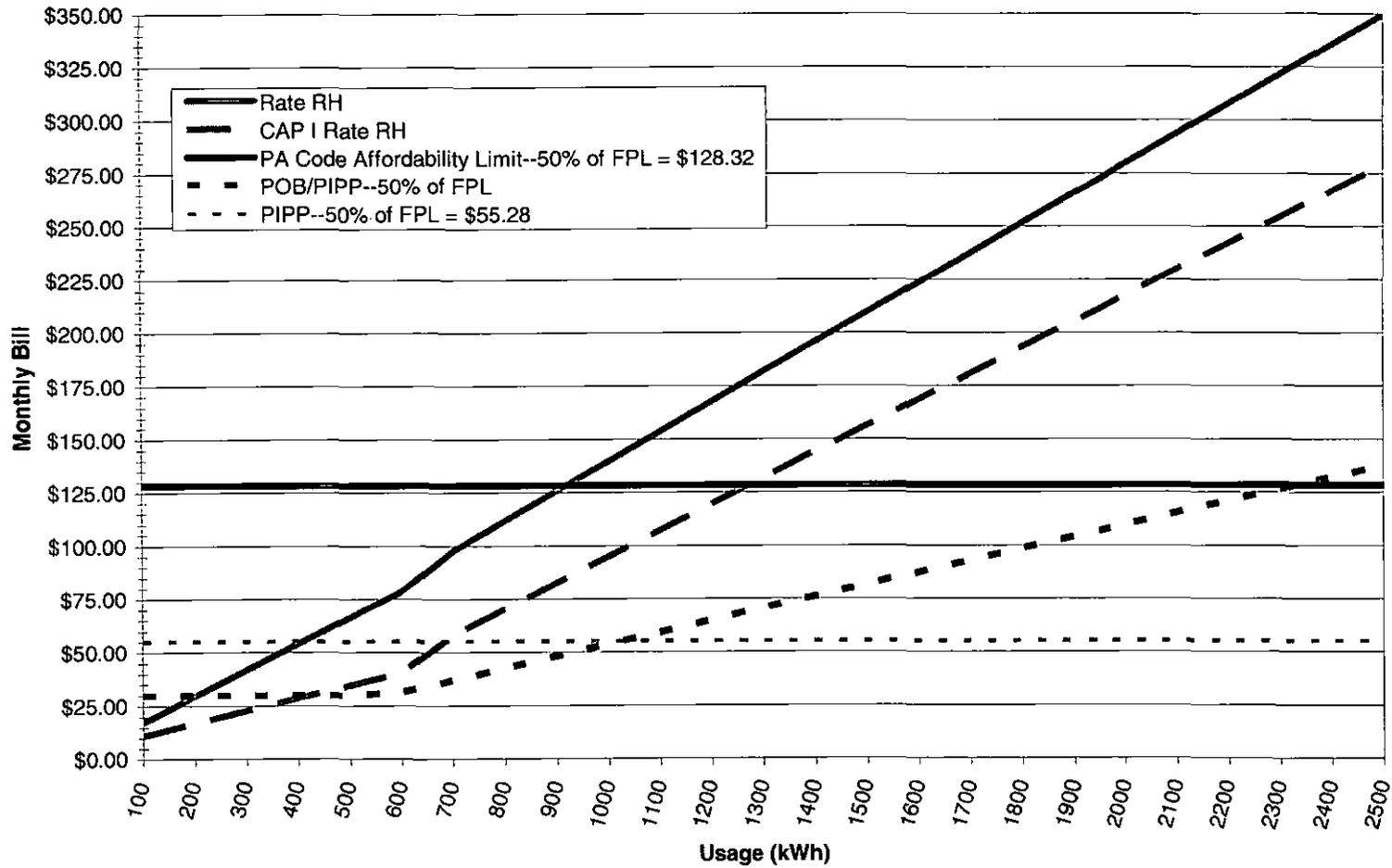
**Family Size of Five--Summer Rate RH Comparison Chart
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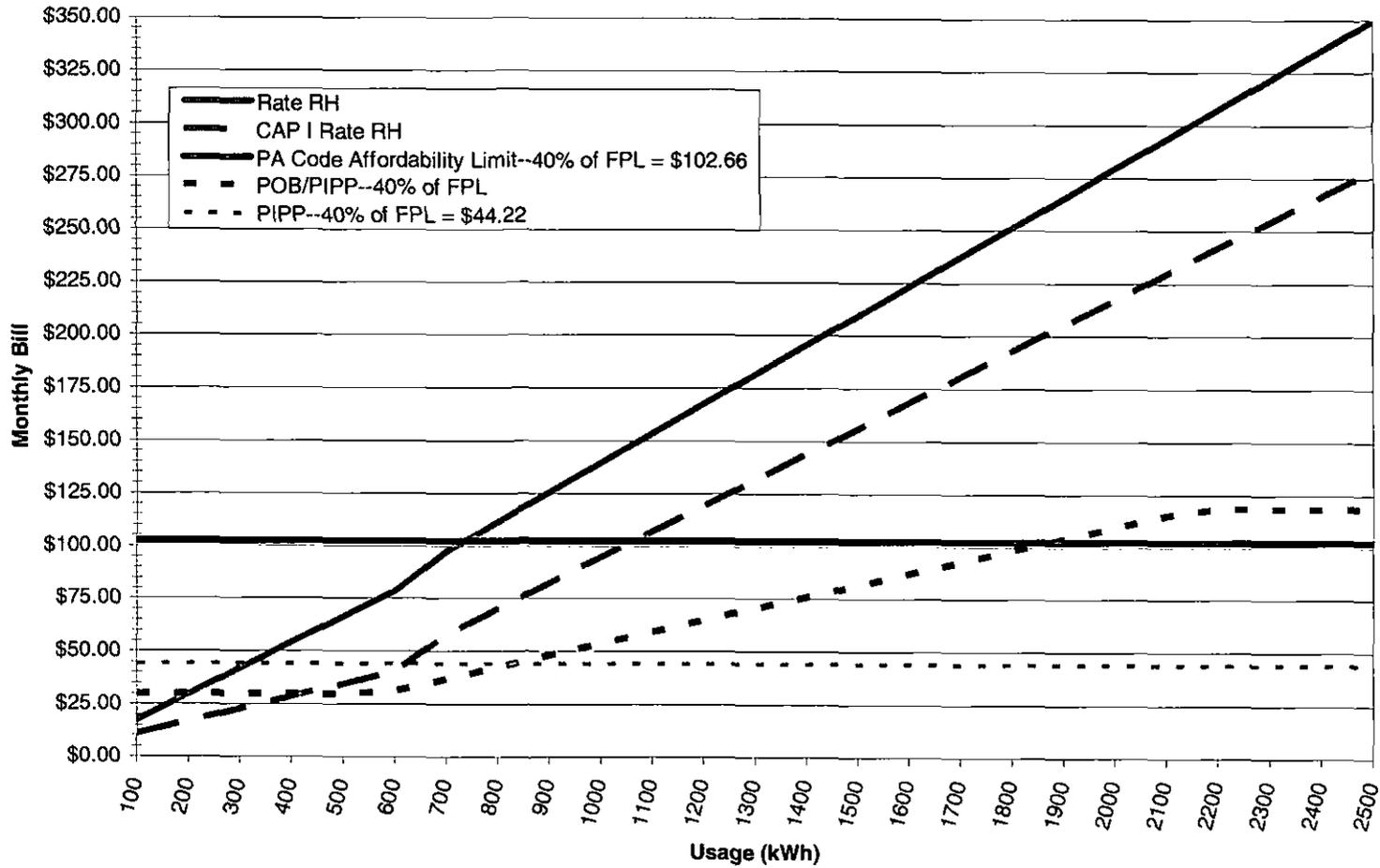
**Family Size of Five--Summer Rate RH Comparison Chart
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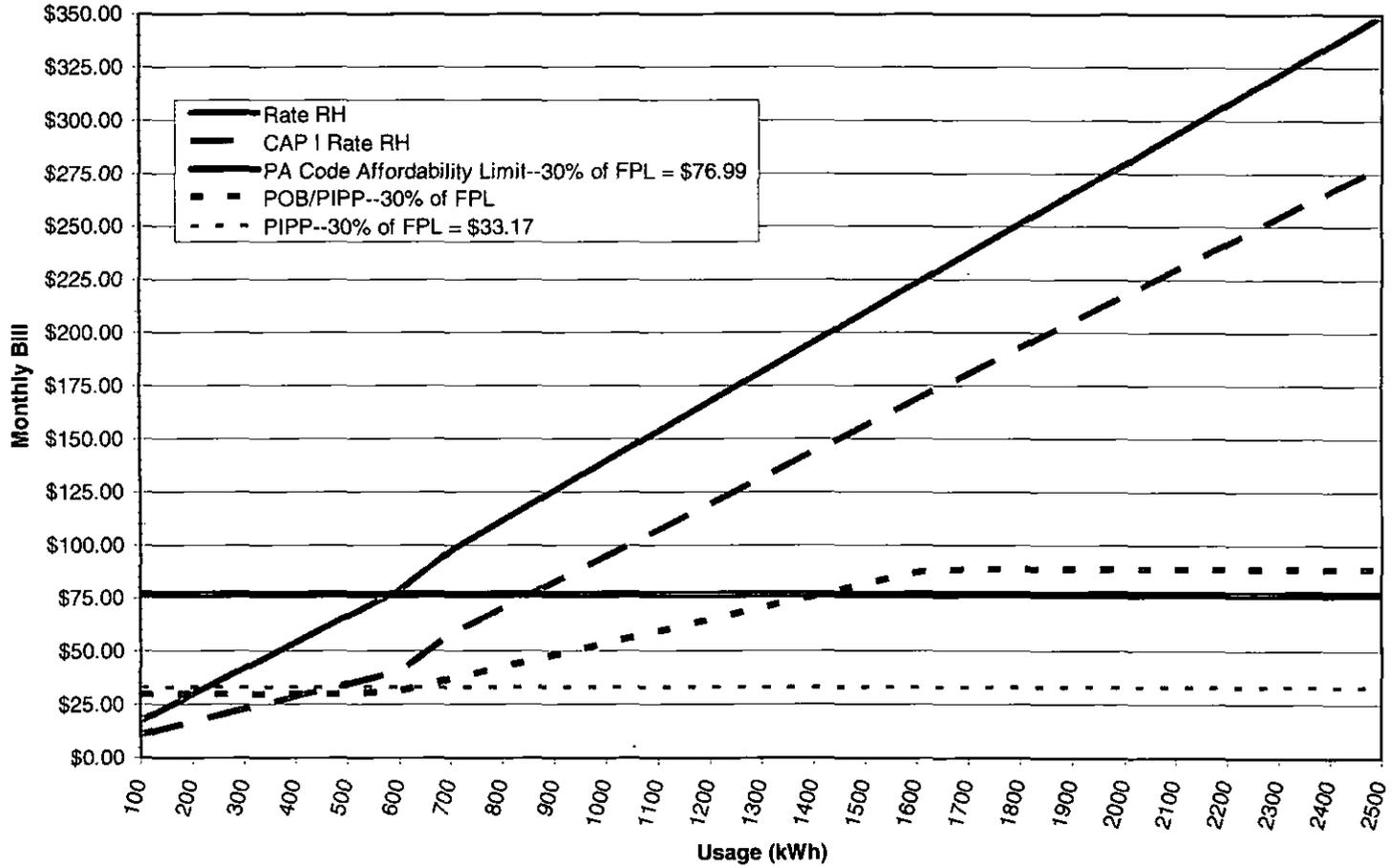
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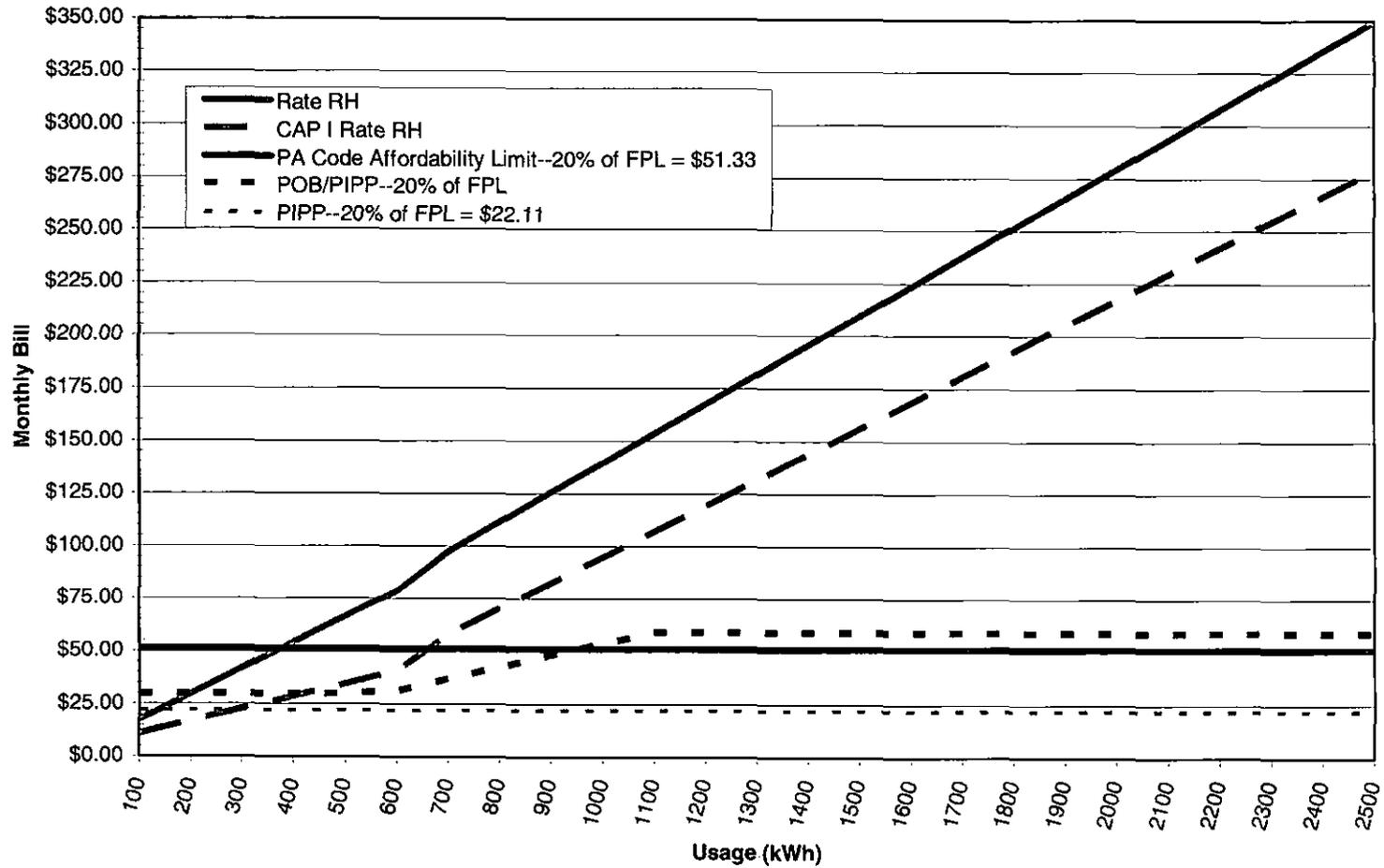
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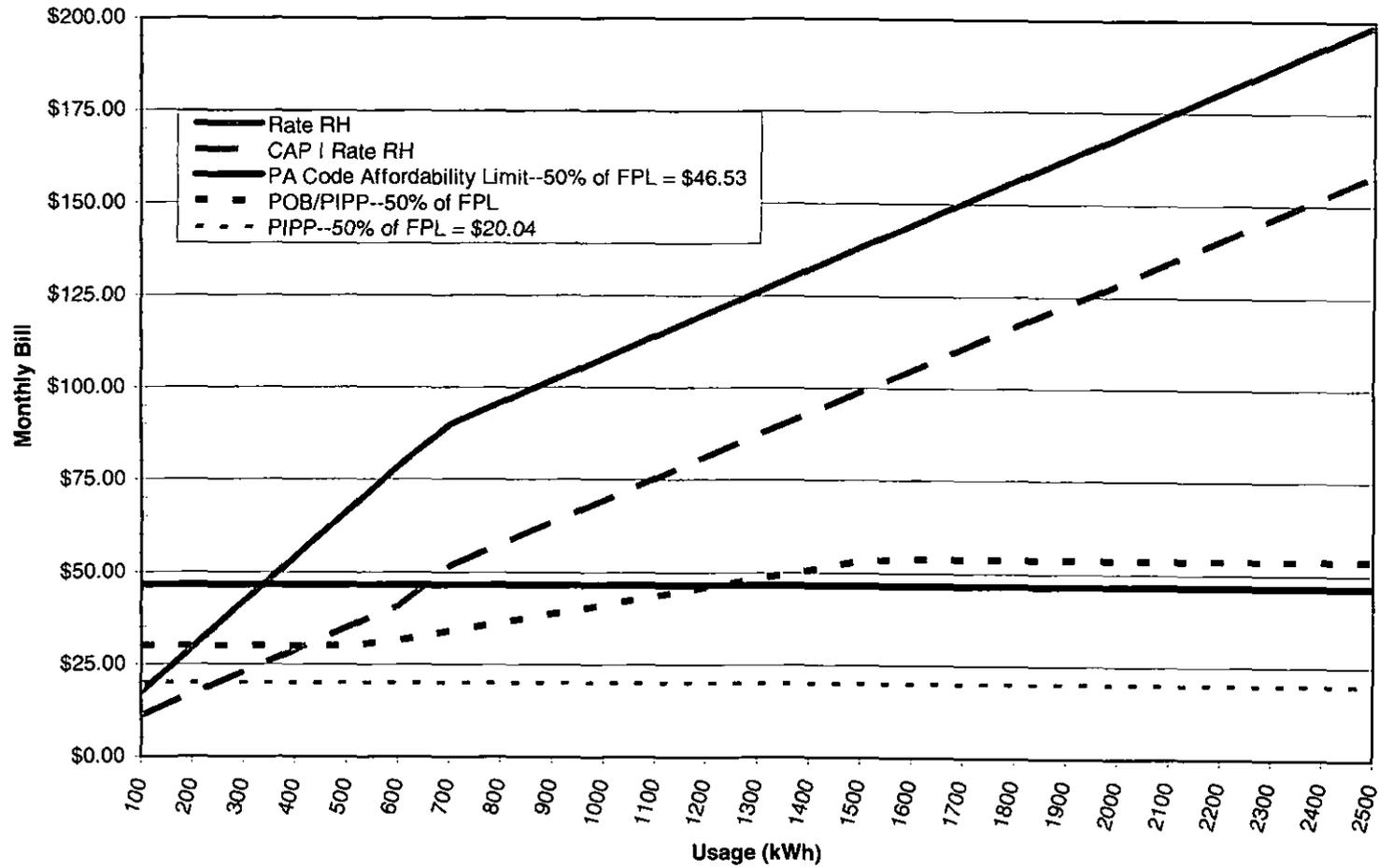
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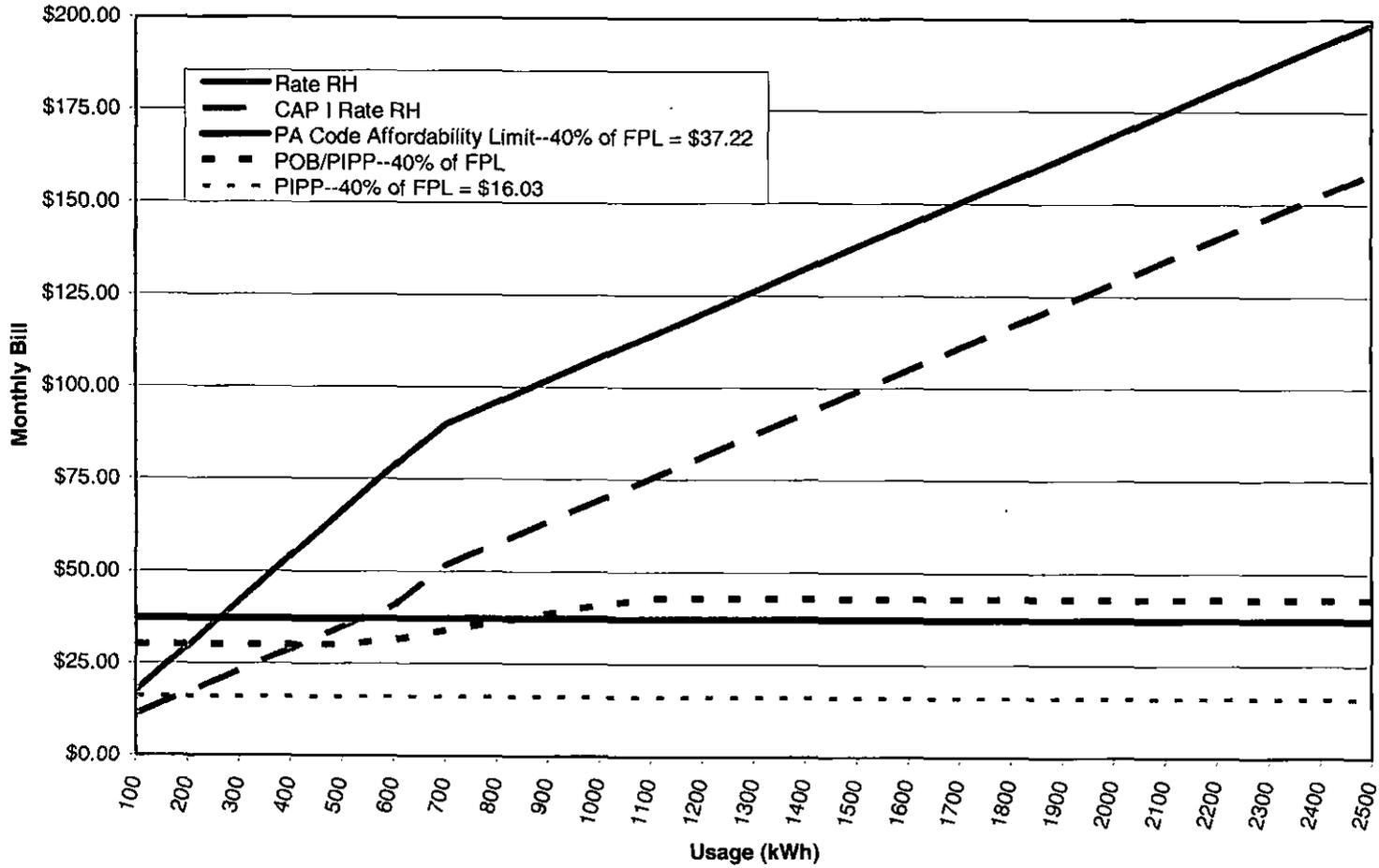
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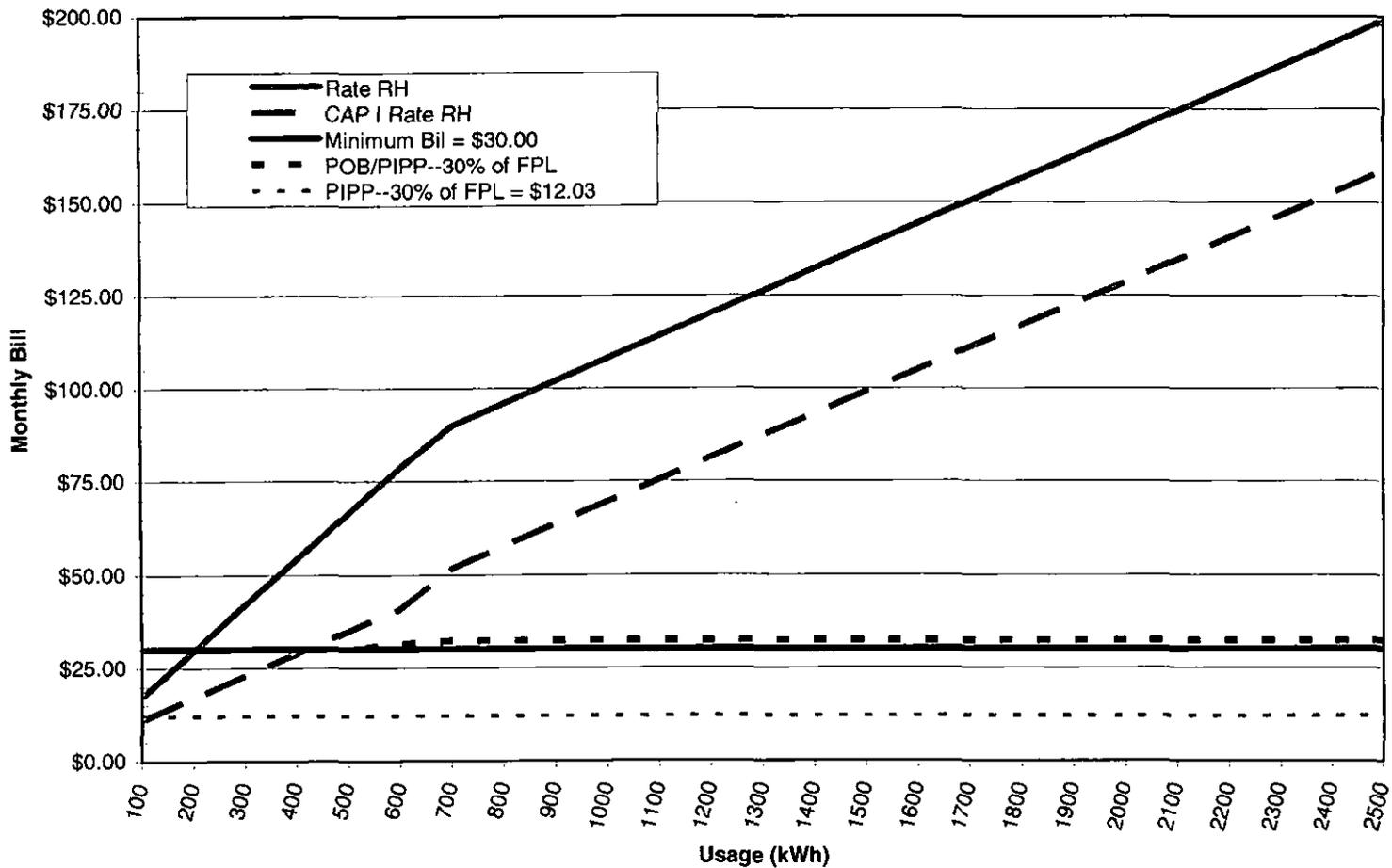
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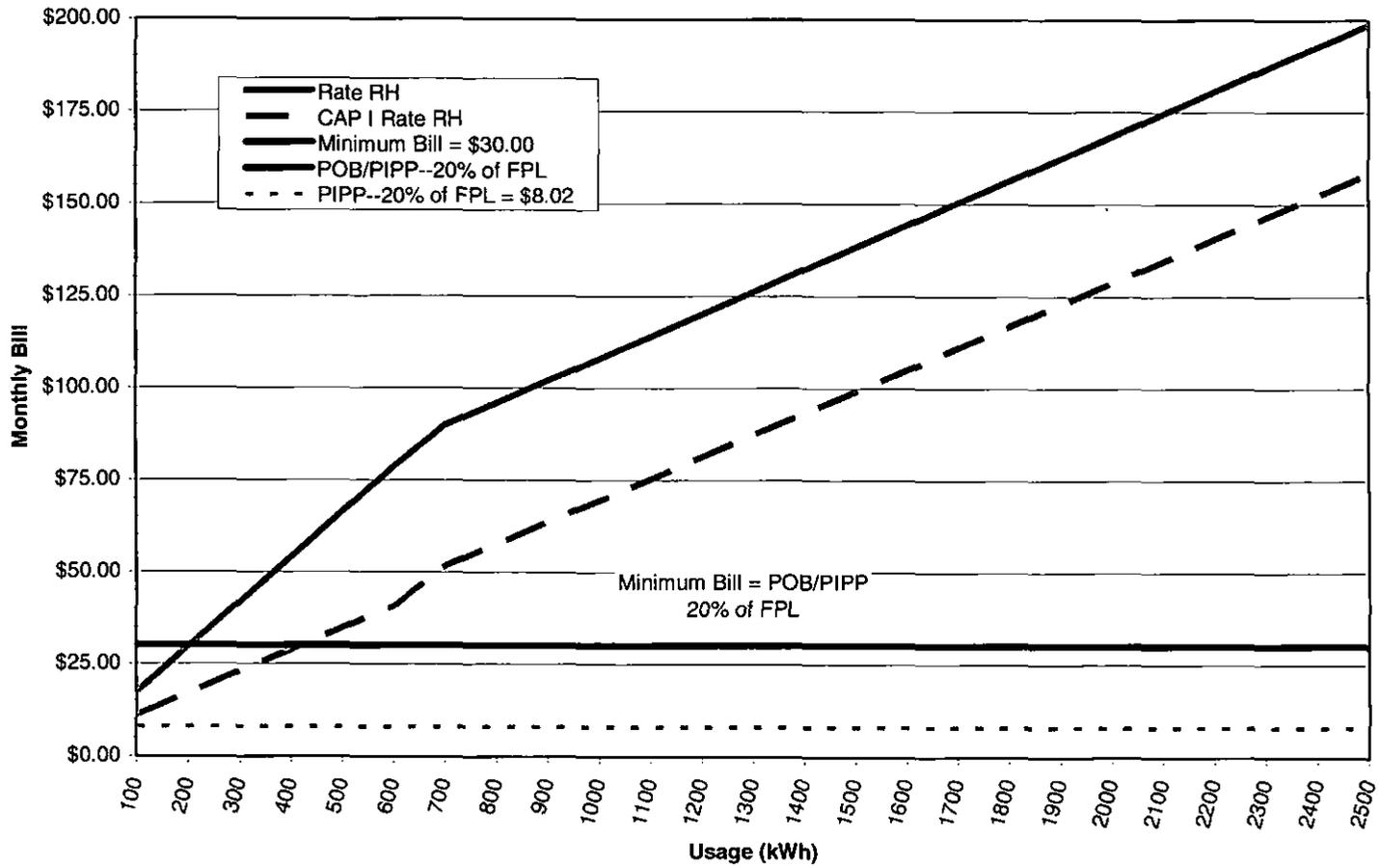
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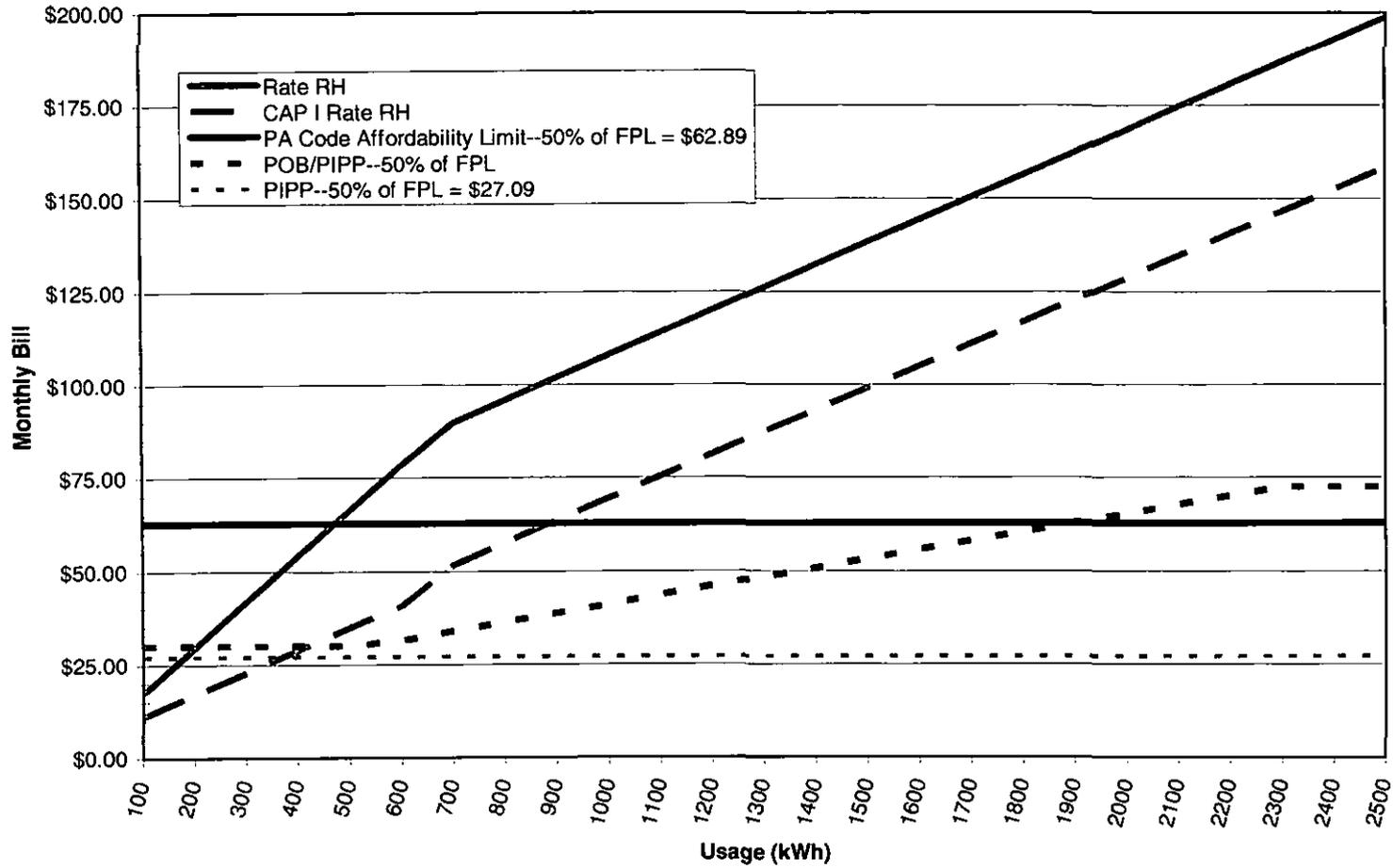
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30% of Federal Poverty Level**



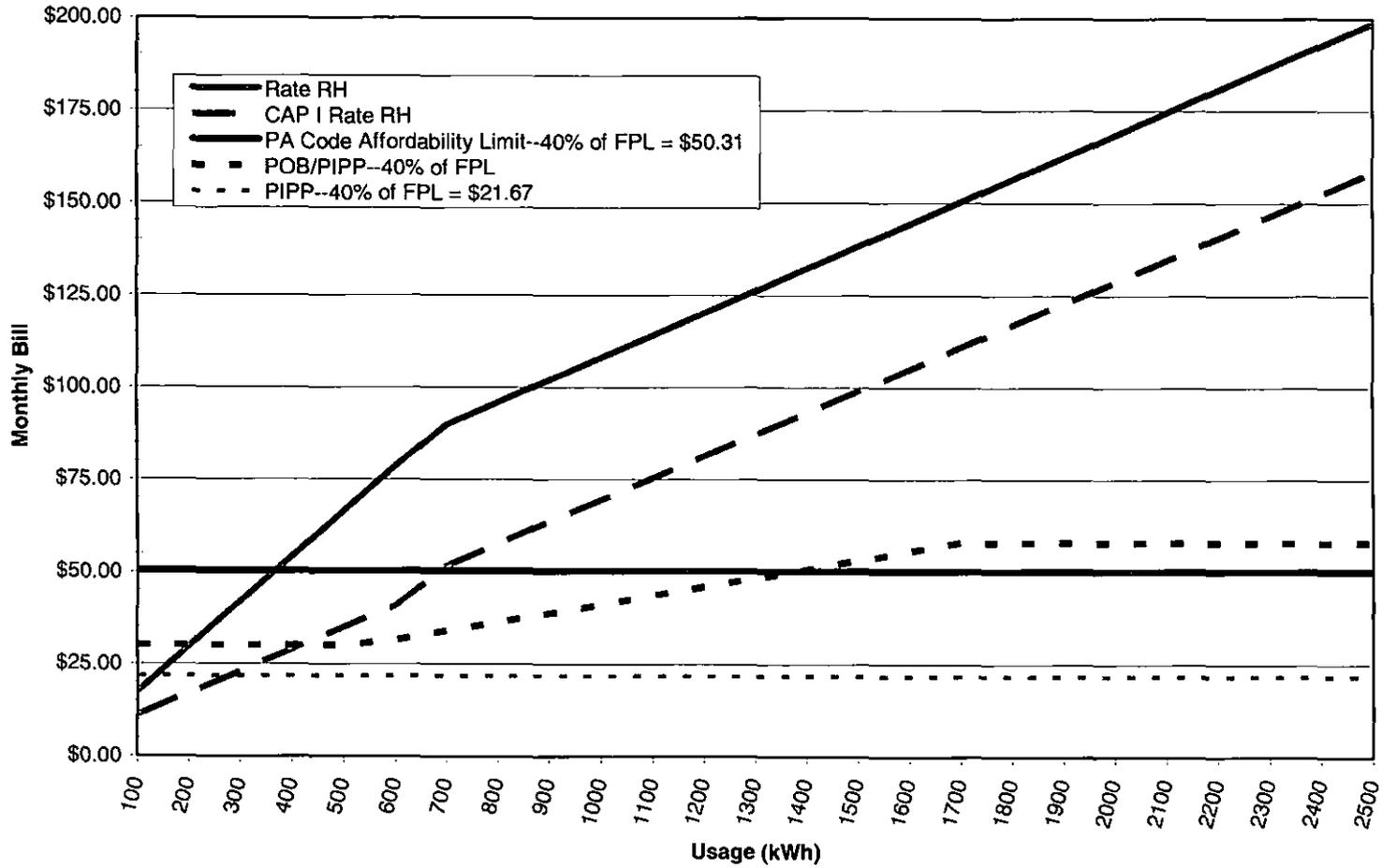
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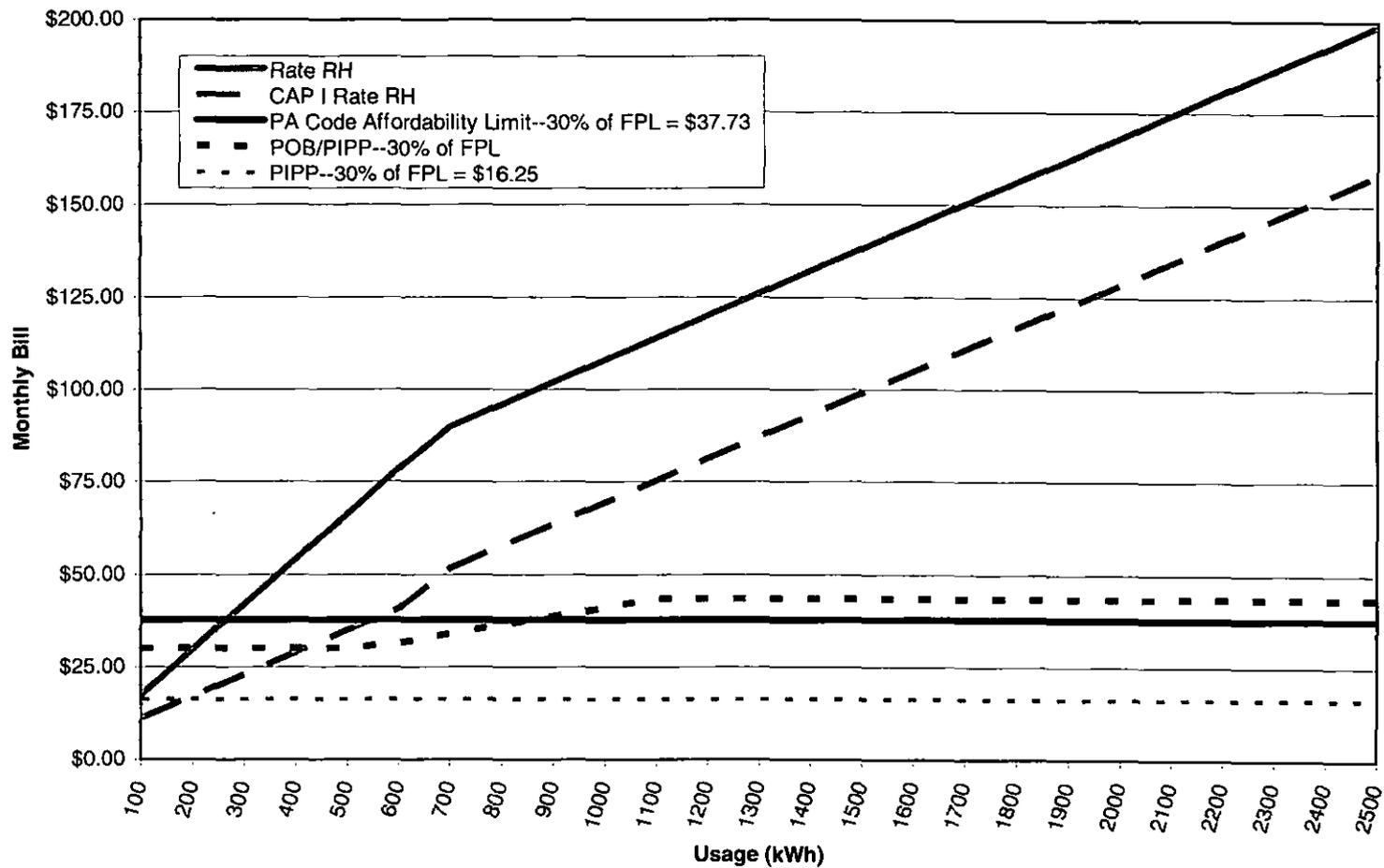
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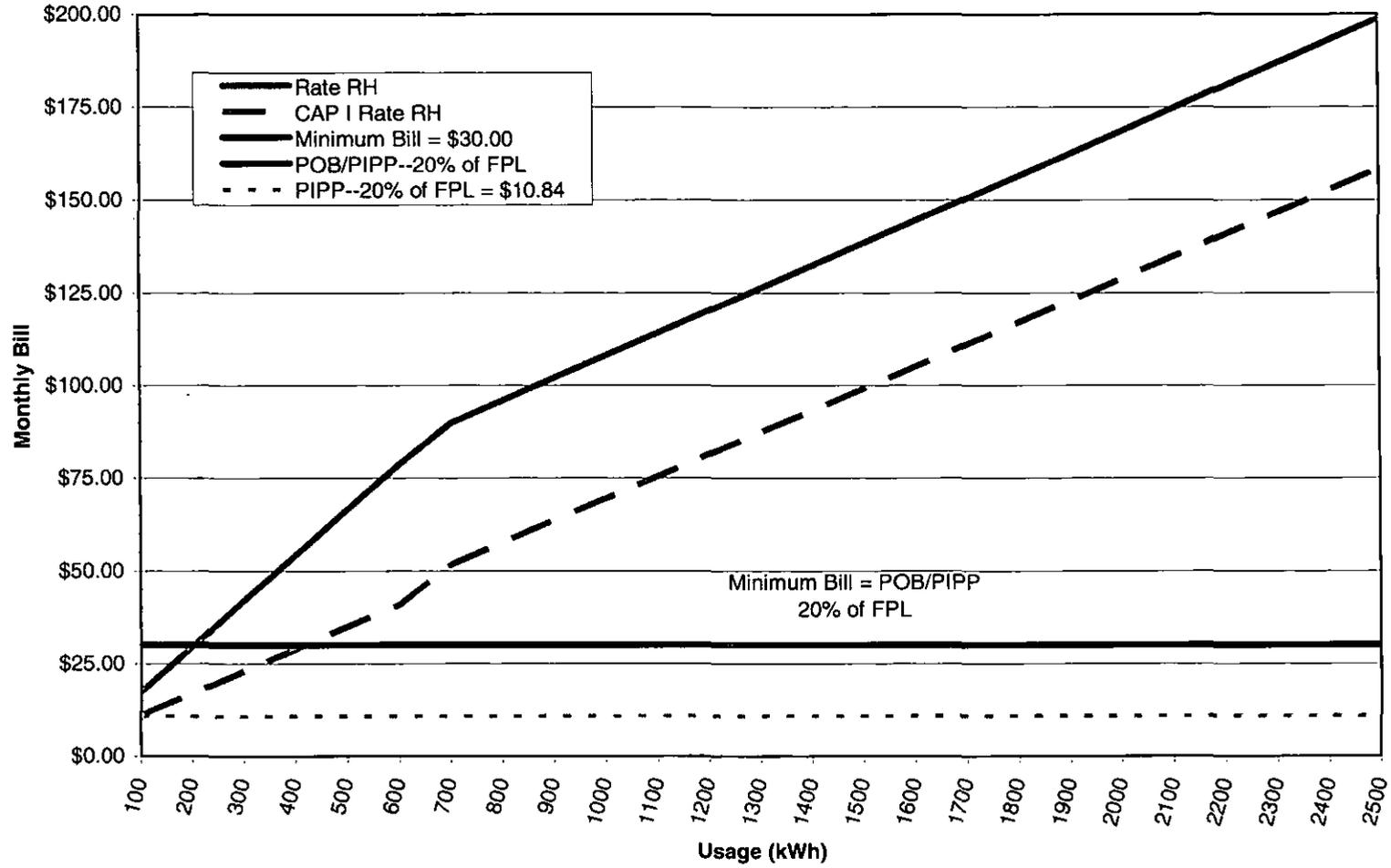
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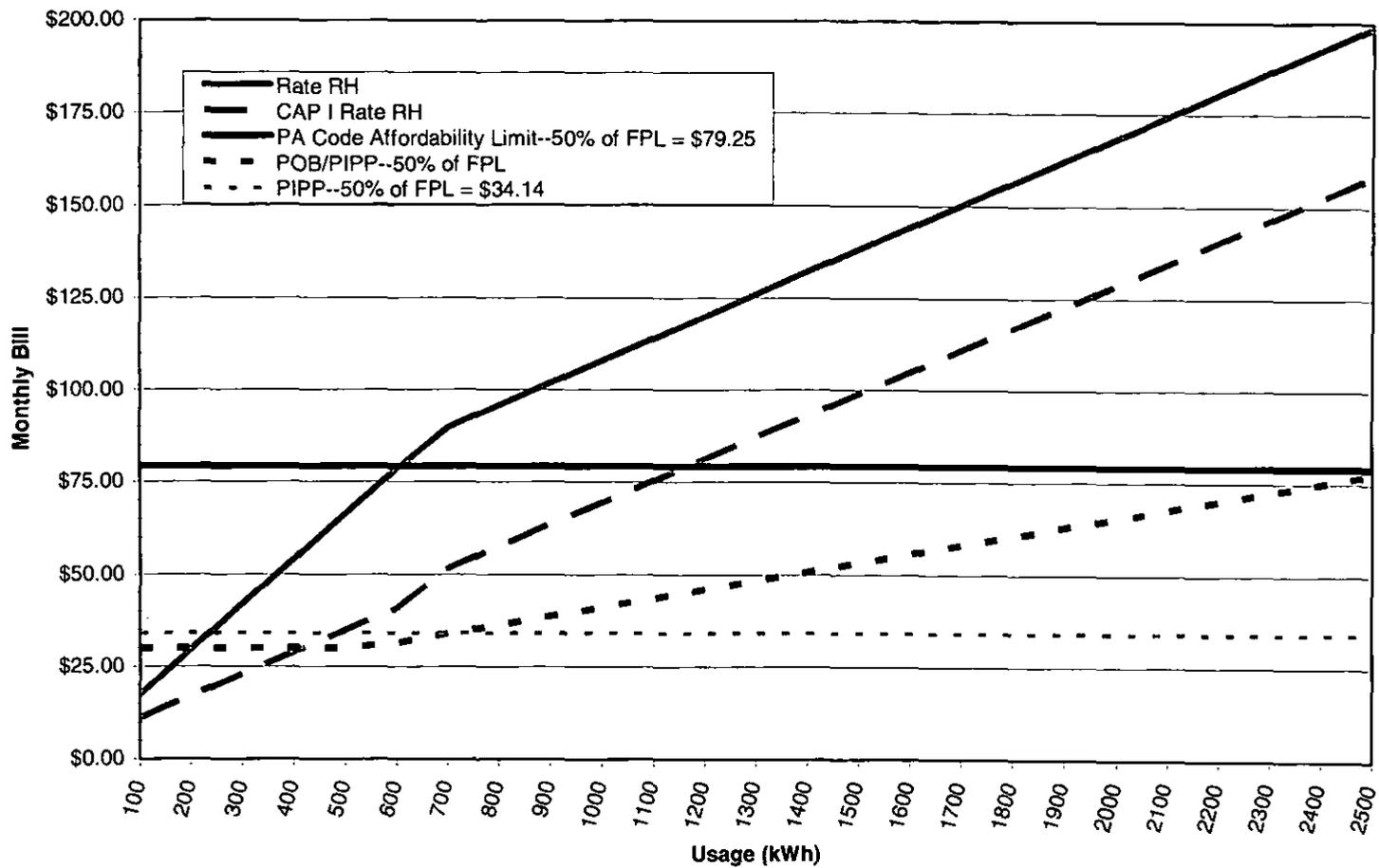
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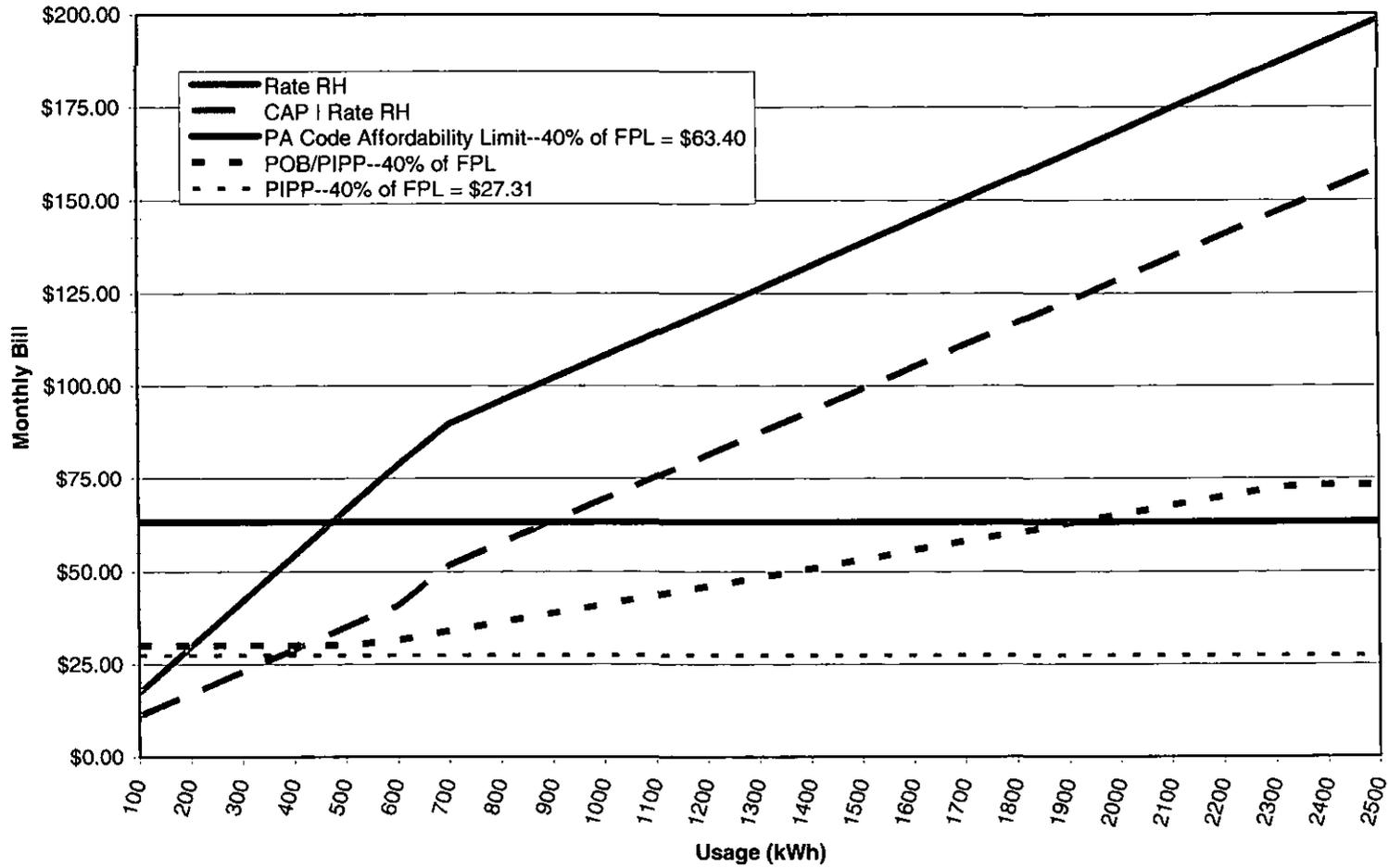
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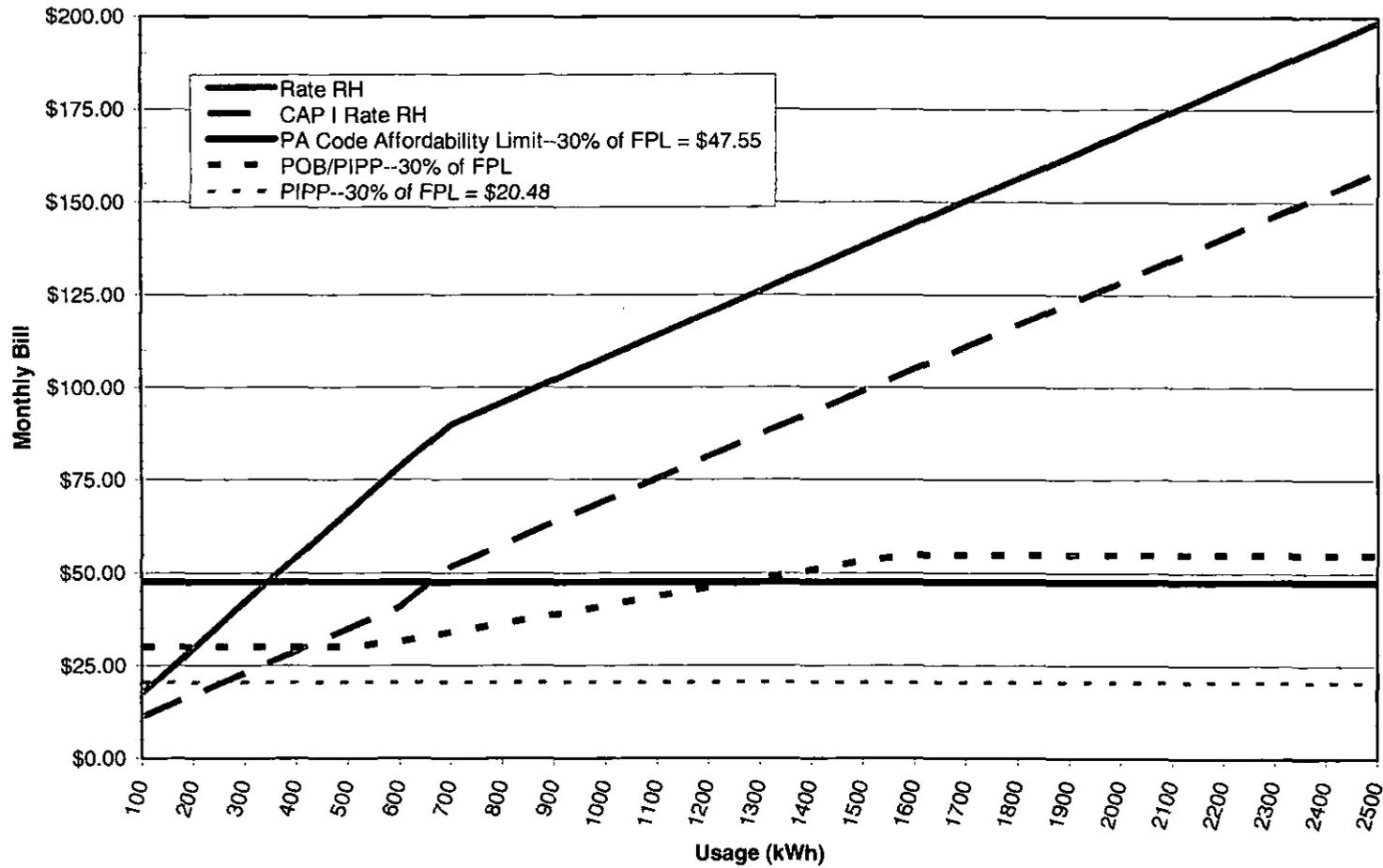
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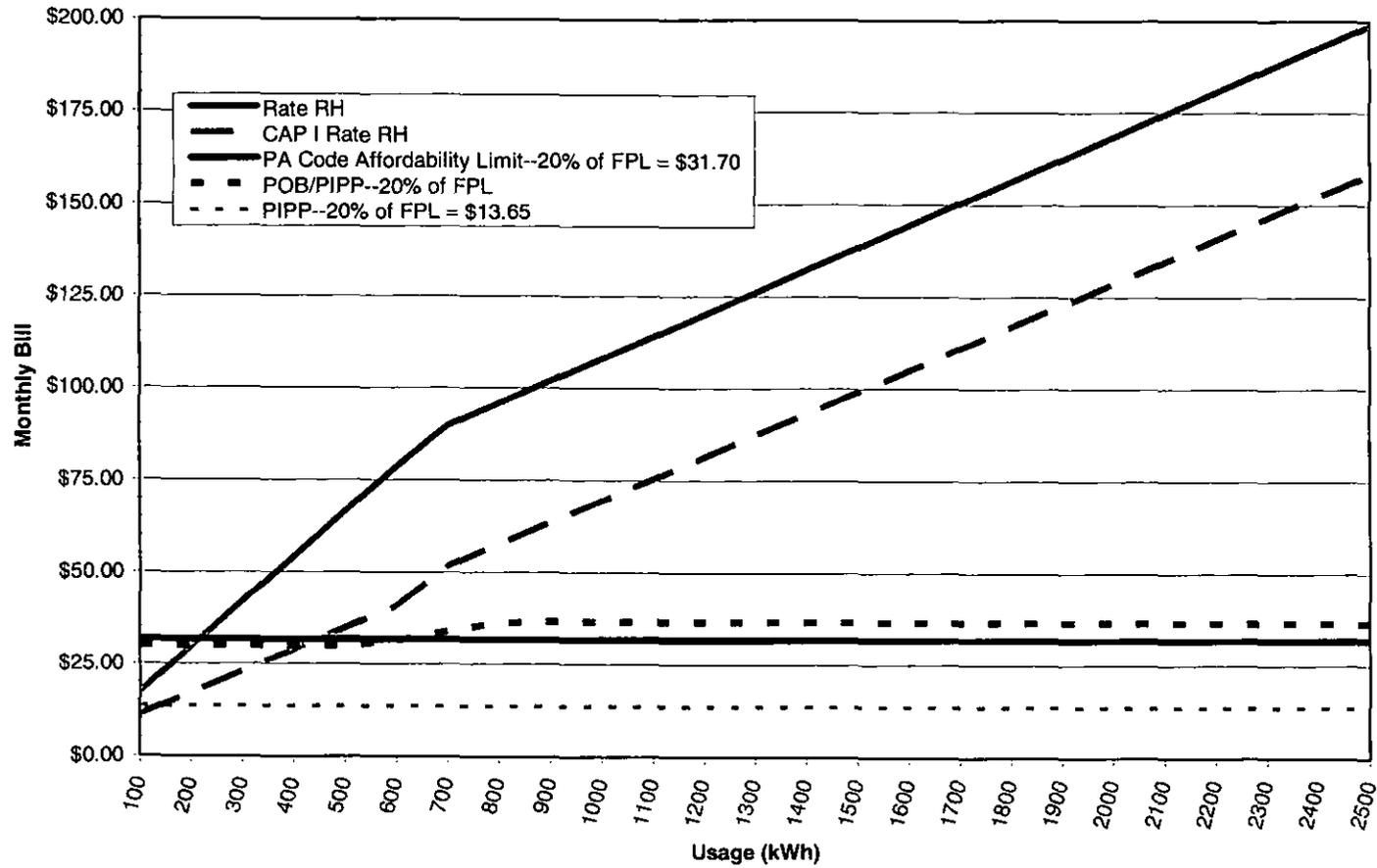
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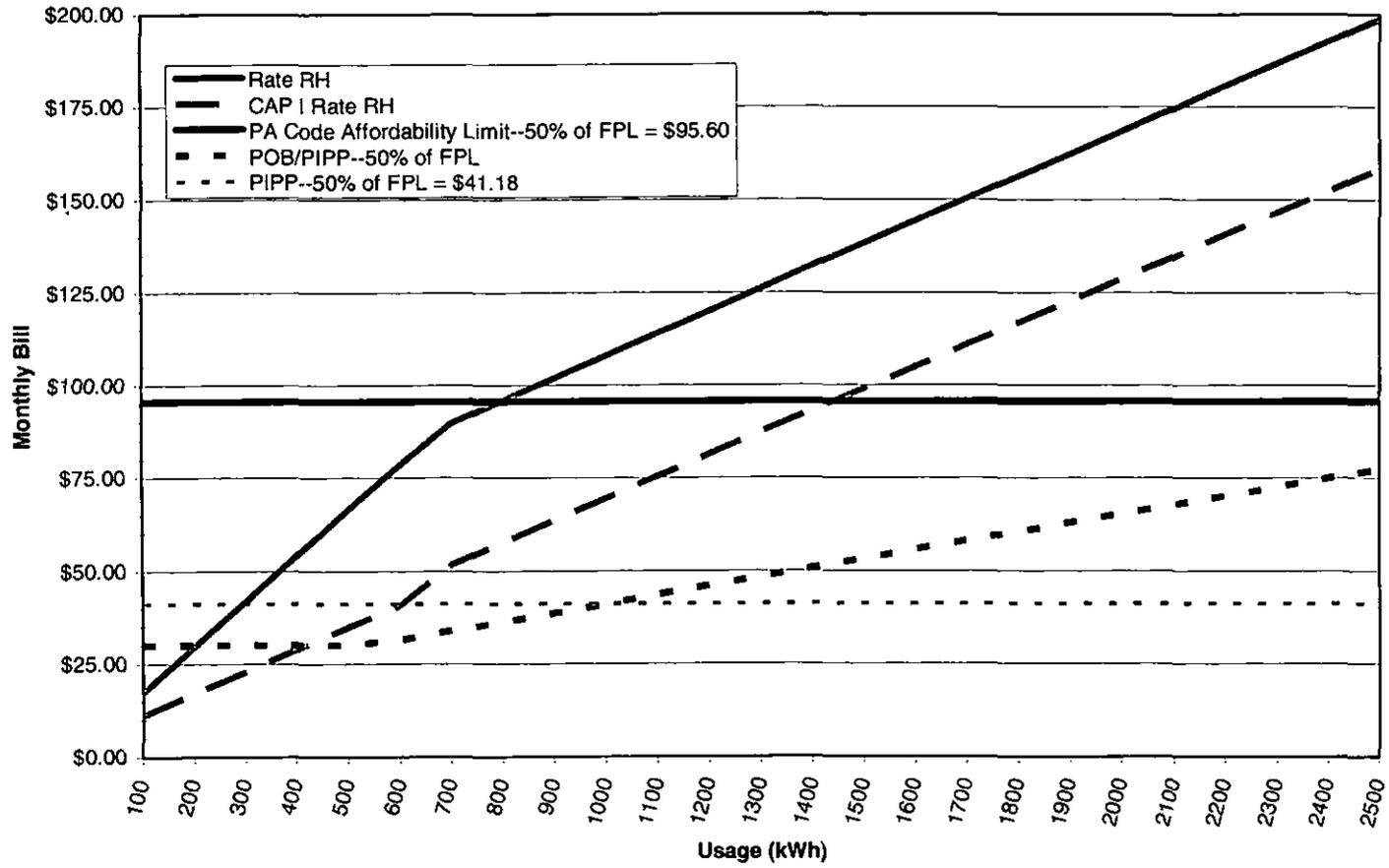
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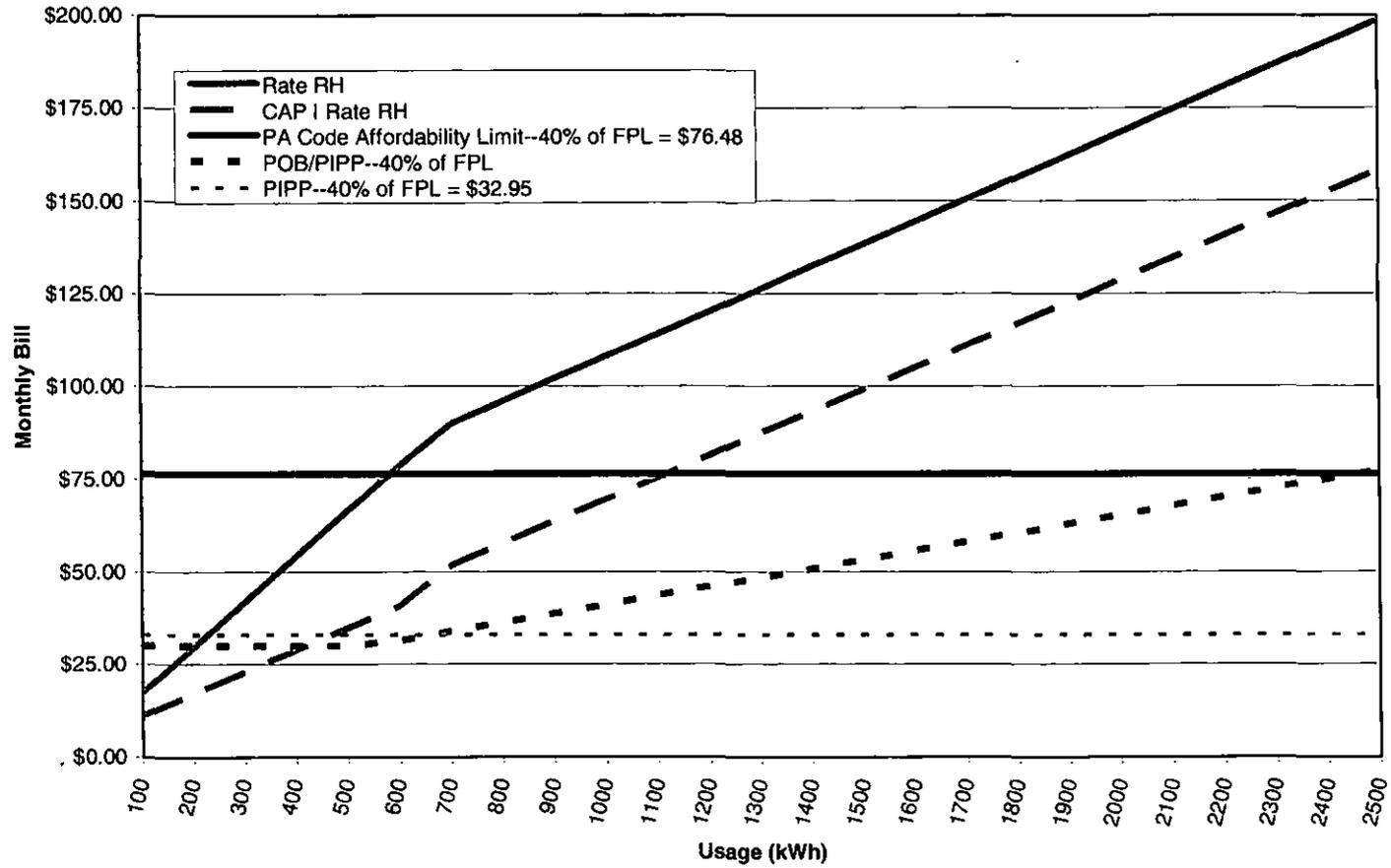
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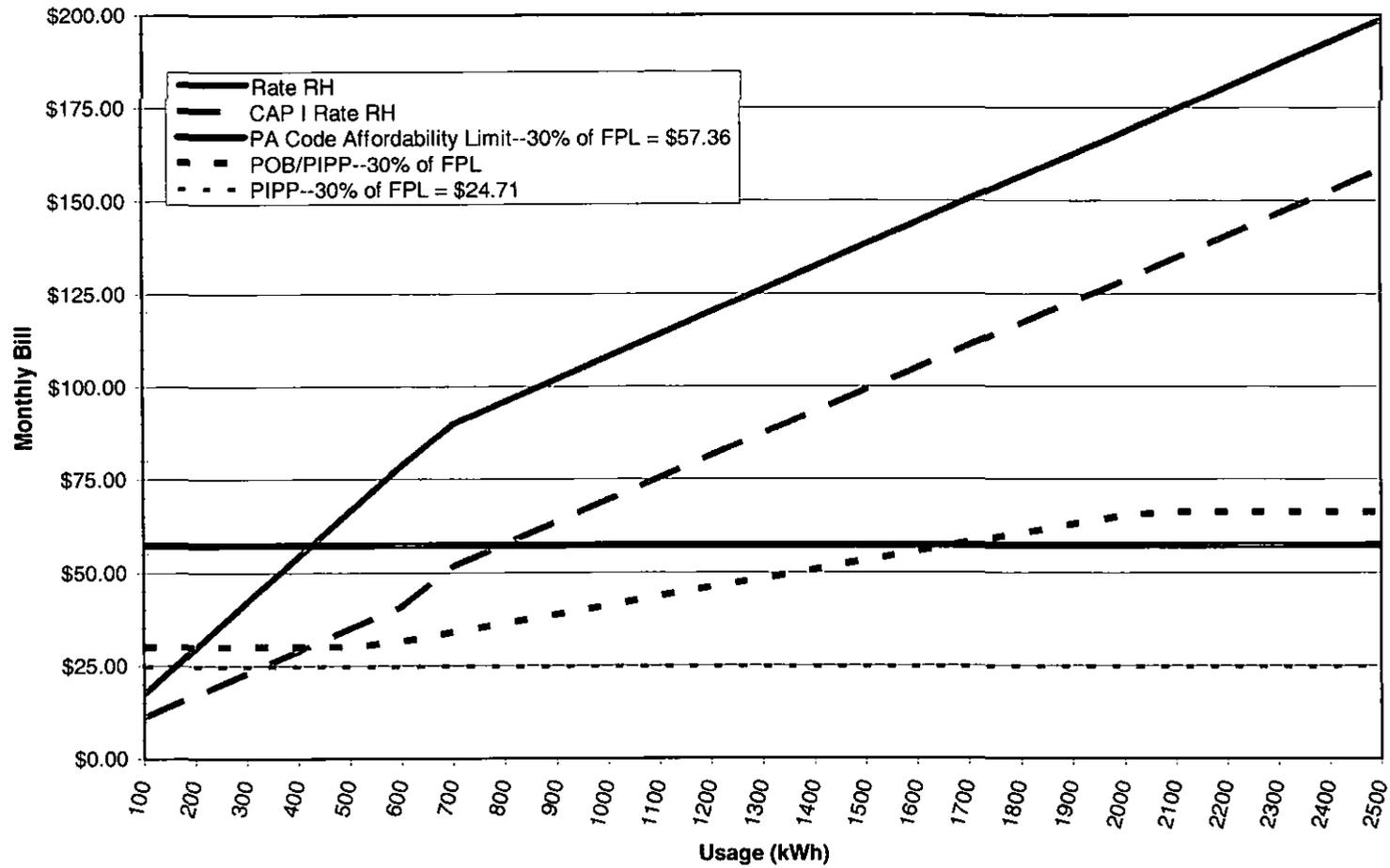
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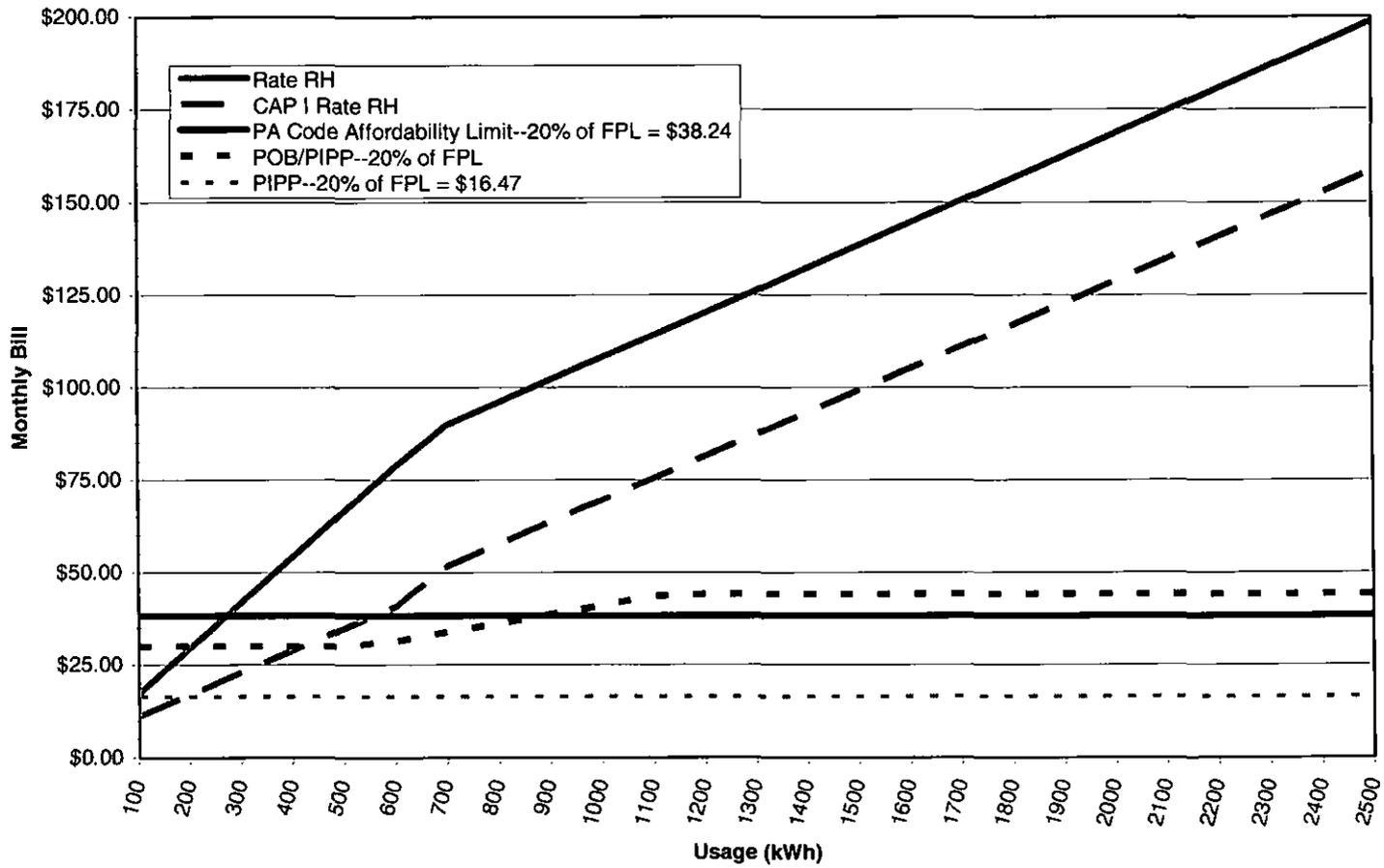
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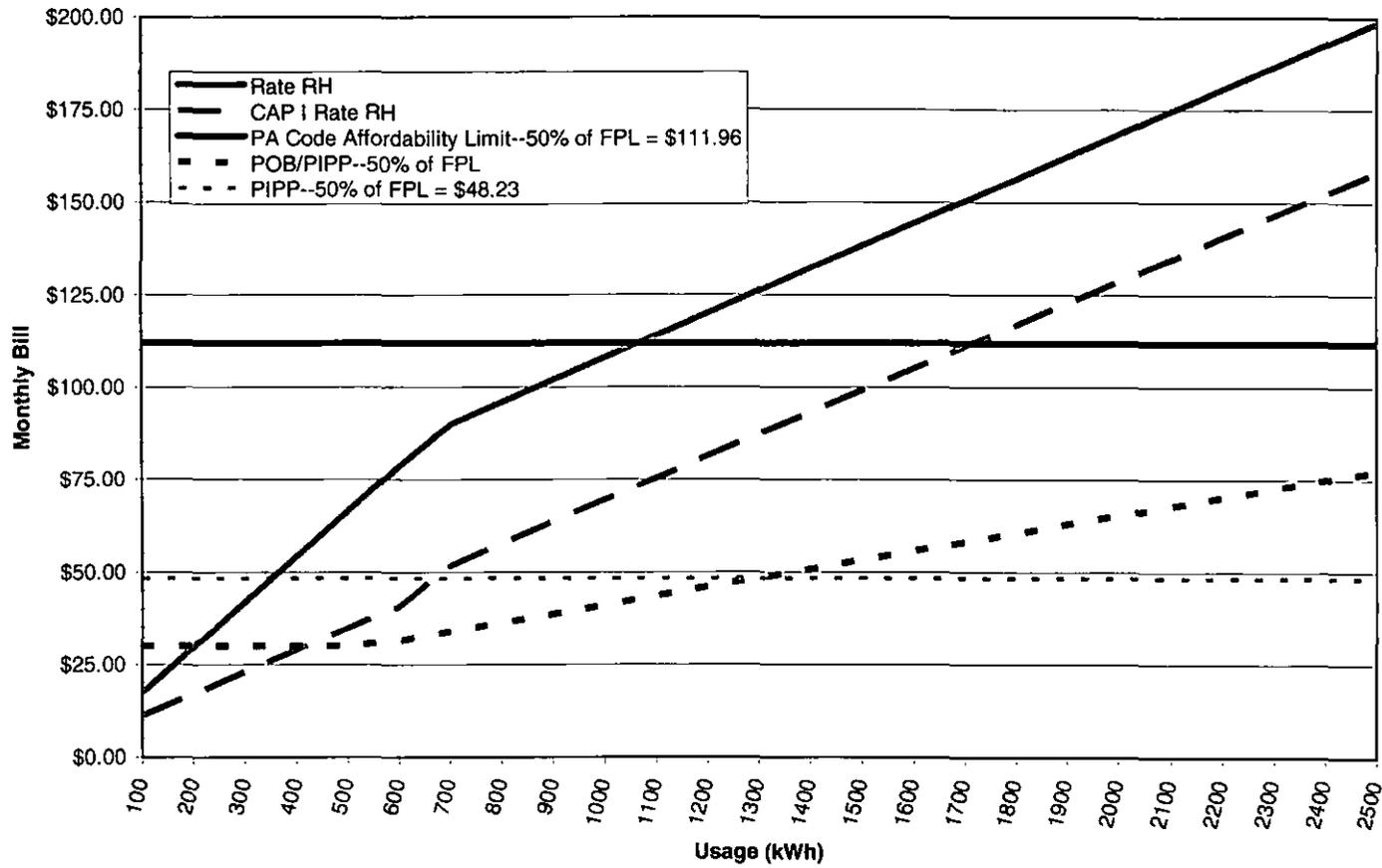
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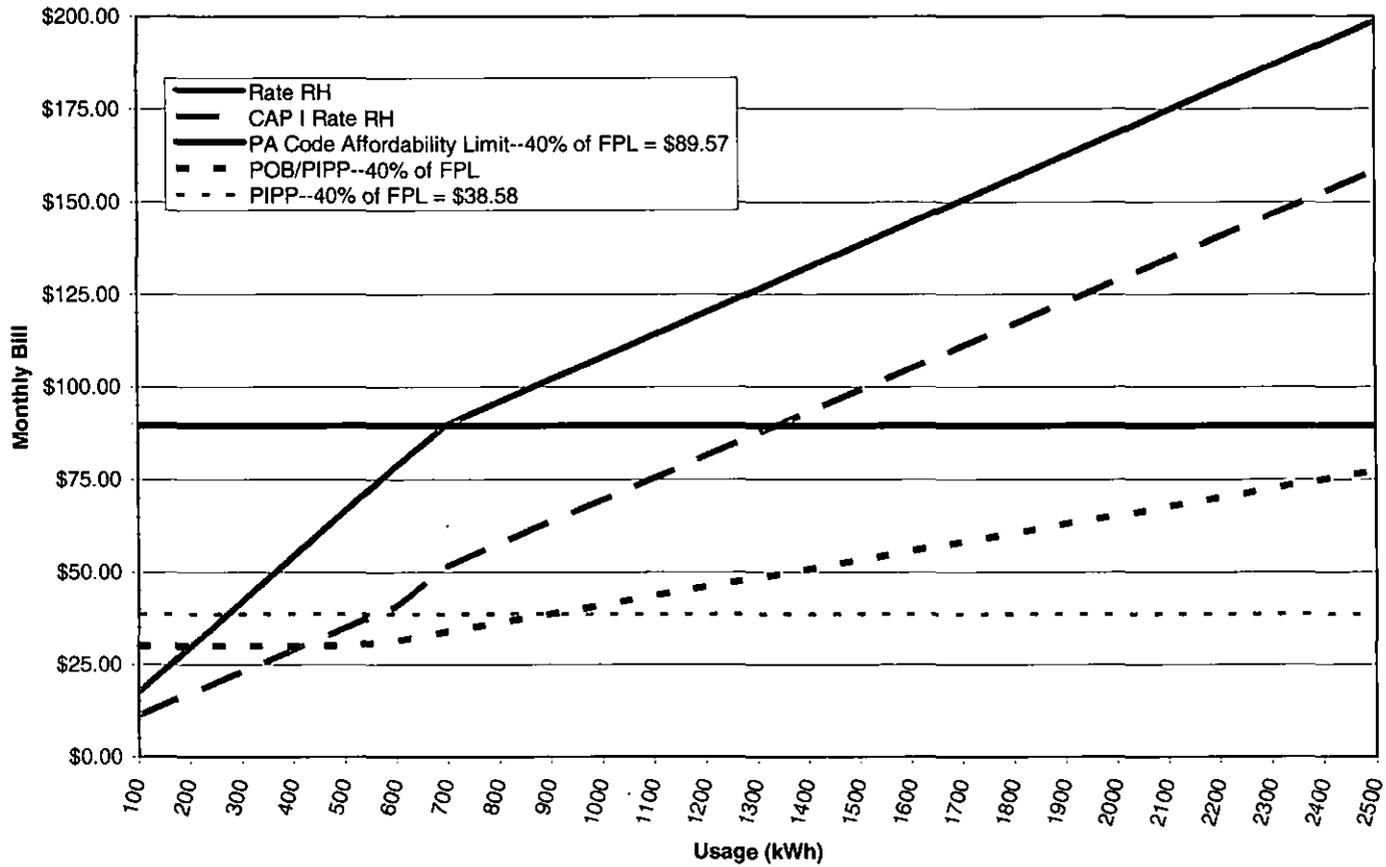
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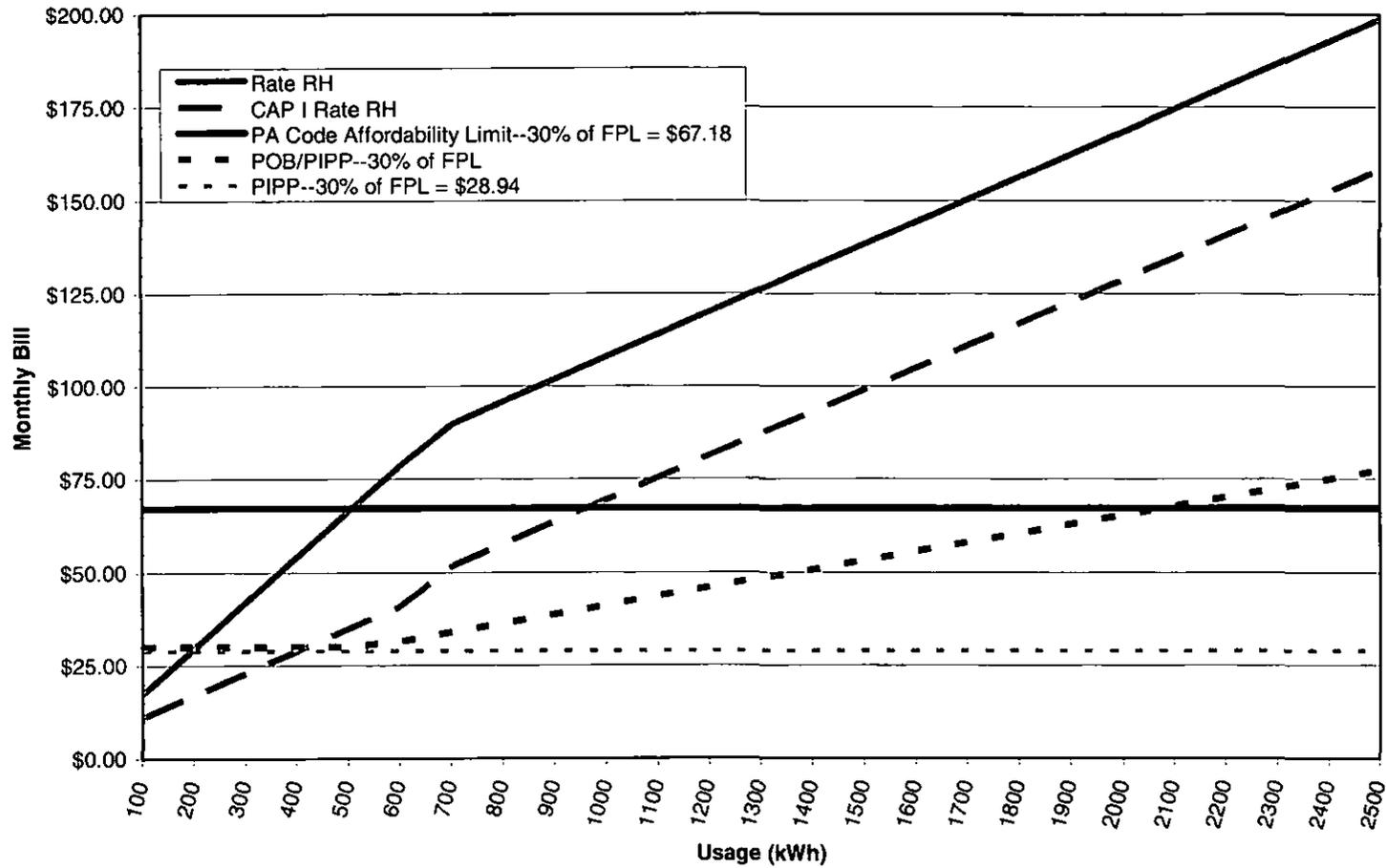
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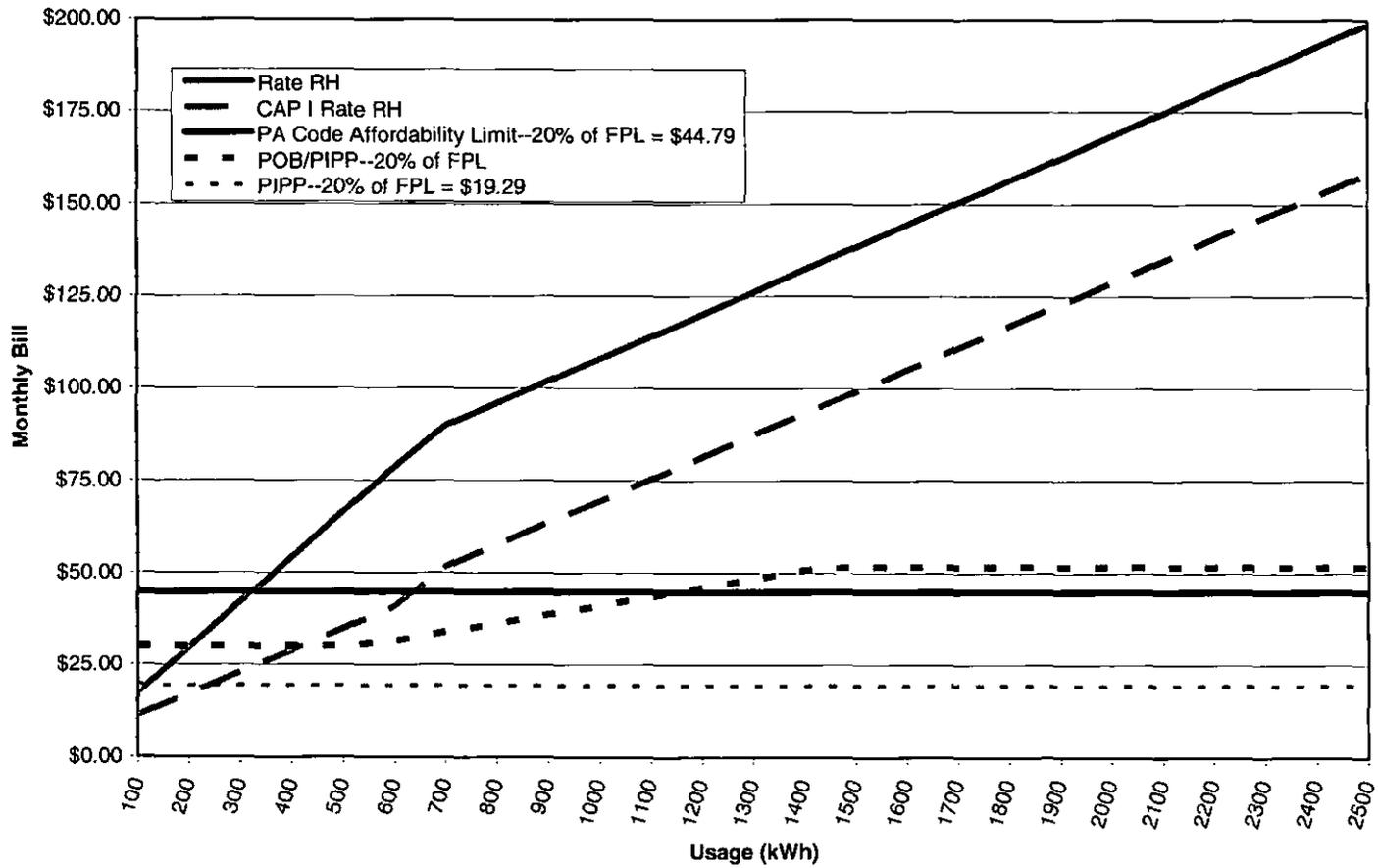
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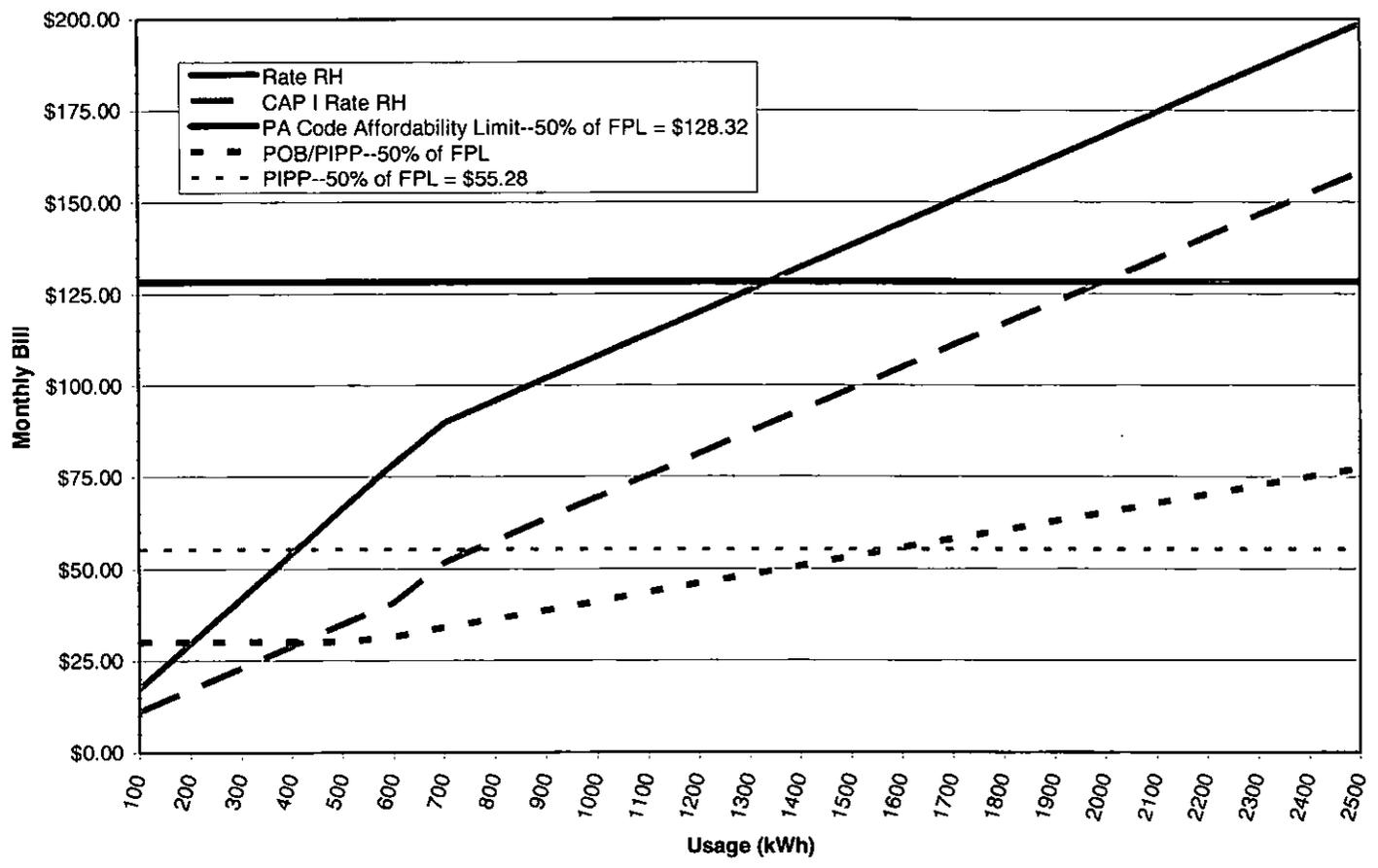
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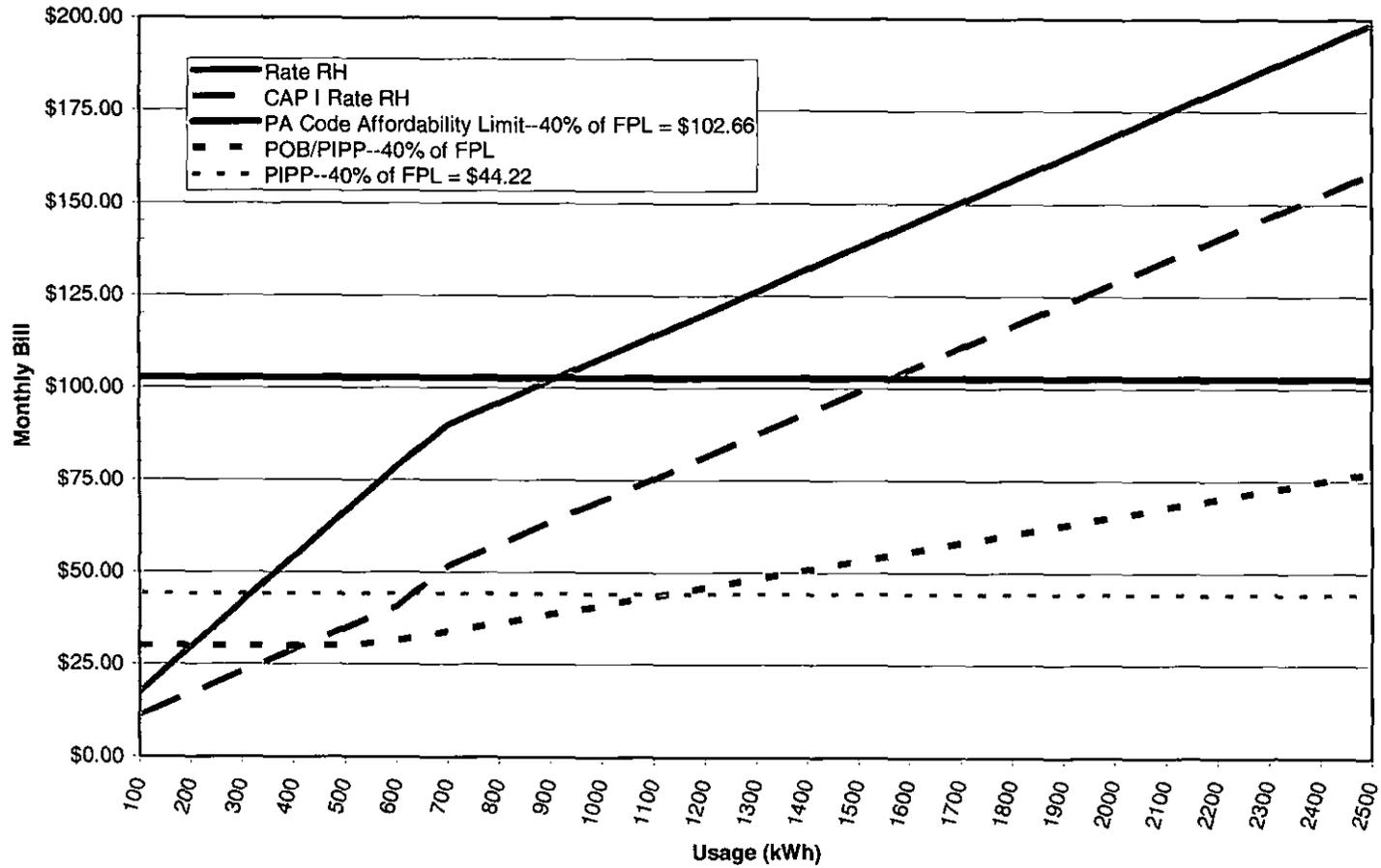
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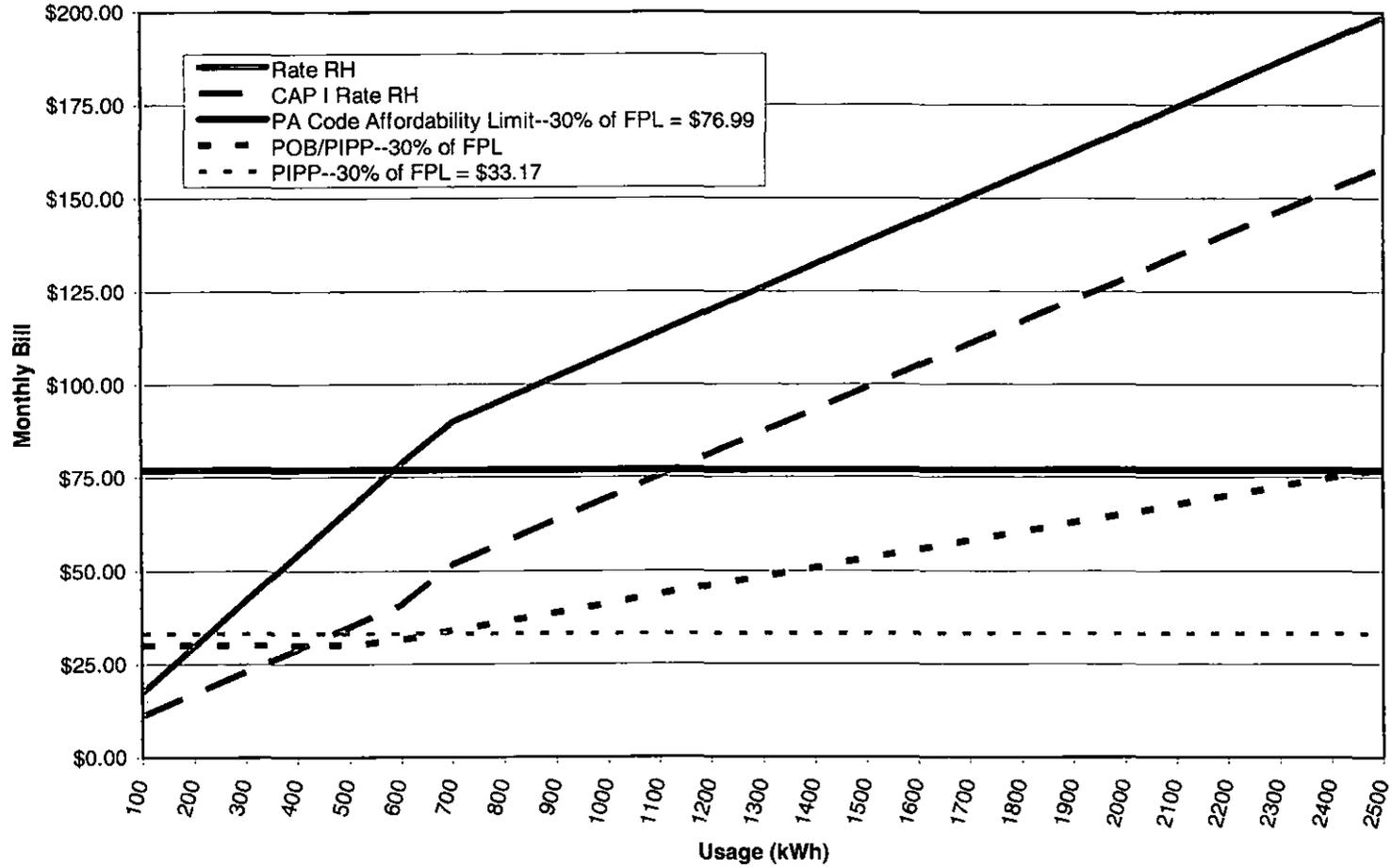
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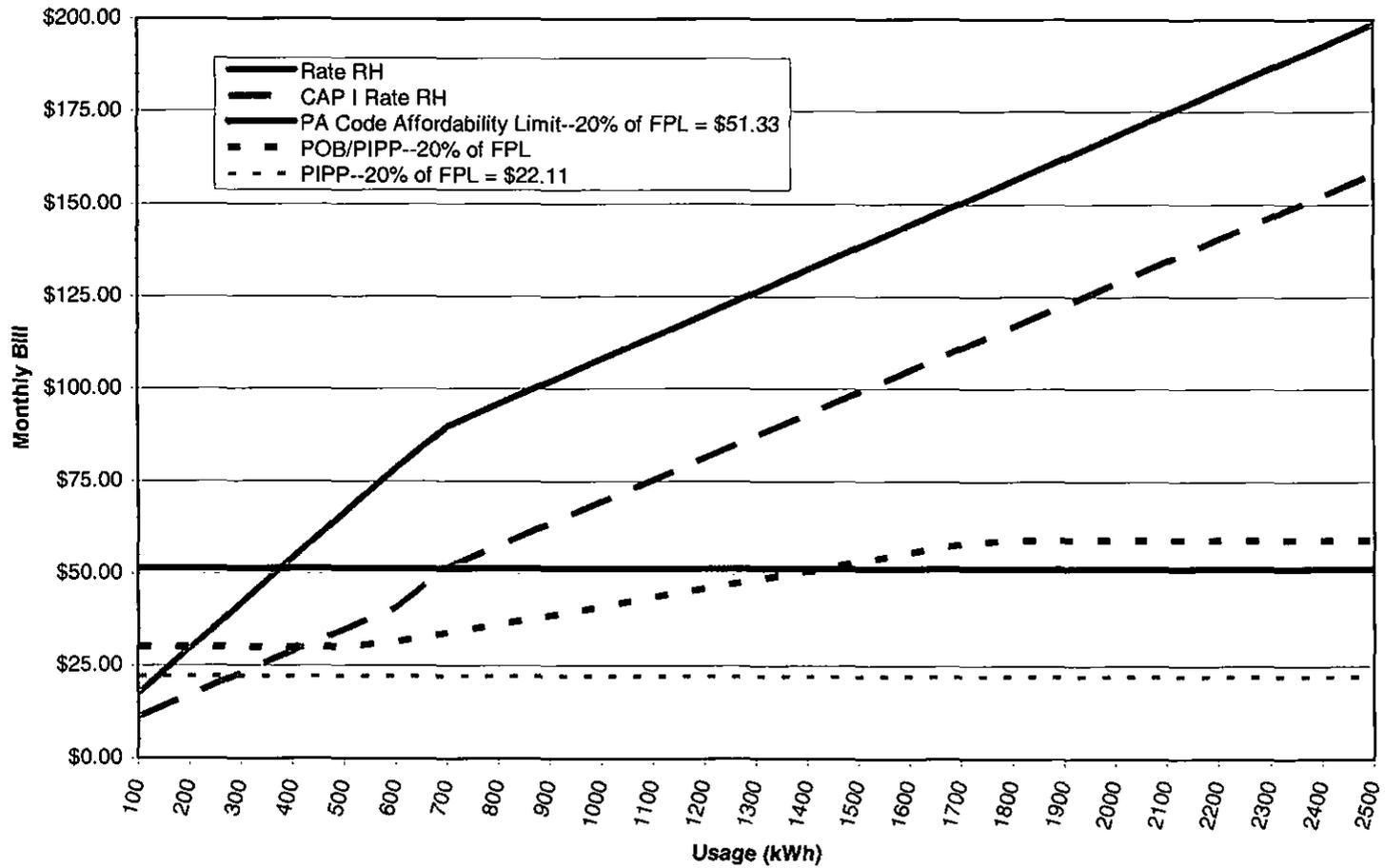
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40% of Federal Poverty Level**



**Family Size of Six--Winter Rate RH Comparison Chart
30% of Federal Poverty Level**



**Family Size of Six--Winter Rate RH Comparison Chart
20% of Federal Poverty Level**



Data Issues

XX DATA

The average payment rate for CAP programs for all utilities in Pennsylvania is 81%.⁵⁶ According to payment data reported by PECO to the Commission, customer payment behavior improved each year in the previous POB/PIPP program design (the design prior to CAP Rate), reaching a payment rate of nearly 90%. In contrast, the payment rate for CAP Rate design has declined to 64%.⁵⁷ However, PECO informed the Commission that its calculation of payment rate does not conform to the Commission's definition, and that its data in this area is unreliable.⁵⁸

This study also surfaced a number of data problems. First, we requested data for the period in which POB/PIPP customers were transferred in whole into CAP Rate, since we were concerned to examine what happened to bills and payments in the shift. However, data prior to February 1999 was not made available. The reason for the unavailability of the data that would show the customer experience of transition between the different bill patterns of the two program structures was that data for this period was damaged. According to PECO, this was due to programming errors in the intensive programming effort to accommodate "Choice."

Second, the patterns in the termination data we have been supplied suggests that the data is not complete. This is one of many outstanding data issues that is ongoing and will need to be resolved by mid-summer of 2002 in preparation for the final report.

Third, there has apparently been a serious lack of control over the call centers in the entry of poverty data, and/or a problem in carrying out and recording data for yearly re-evaluations. The year chosen for analysis for this study was Calendar Year 2000. This choice provides a stream of back data beginning in February of 1999 as well as approximately an additional year

⁵⁶ Docket No. M-00001418, PECO's Submission of Universal Service and Energy Conservation Plan in Compliance with Section 54.74, Order of September 28, 2000, P. 9, Line 14.

⁵⁷ Ibid., P. 10, Line 10, with accompanying graph.

⁵⁸ Ibid., P. 10, Lines 1-4.

of data from 2001. The problem of uncoded poverty data is illustrated in Figures XX-1 through XX-3.

PECO CAP & Confirmed Low-Income Households, 2000					
Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6
	Income Block			Total CAP	Confirmed Low-Income
	0-50%	51-100%	101-150%		
January	43,130	26,068	12,752	81,950	190,471
February	43,035	26,385	12,965	82,385	190,441
March	42,738	27,077	13,224	83,039	190,657
April	42,287	27,700	13,525	83,512	193,412
May	41,591	27,978	13,626	83,195	193,781
June	40,915	29,805	14,558	85,278	193,570
July	40,531	30,287	14,777	85,595	192,721
August	39,791	31,186	15,205	86,182	193,708
September	39,108	31,943	15,562	86,613	193,052
October	34,250	34,273	16,364	84,887	193,730
November	33,487	33,667	16,016	83,170	190,995
December	32,770	33,524	15,911	82,205	193,664
Average	39,469	29,991	14,540	84,001	192,517

Source: PECO Universal Services Reporting Requirements, Input Document, December 13, 2001.

Figure XX-1: 2000 Data As Filed (Col. 1-5)

When the evaluation attempted to “true up” the data provided for the evaluation database with the Calendar Year 2000 Reporting Requirements filing, many thousands of cases were initially missing from the 0-50% poverty range. The resolution was that approximately 29,000 cases in the range from 0-50% of the Federal Poverty Level are not coded with the poverty level or with the household income or household size. The company follows a rule of placing into the 0% of poverty all cases for which it has no computerized poverty information.

With this additional data the total CAP numbers (Figure XX-2) from the evaluation database true up to the Calendar Year 2000 Reporting Requirements filing to a very close approximation. This occurs when all CAP cases without poverty data are assigned to 0% of poverty.

Total CAP - Calendar Year 2000			
Total CAP Reported	Total CAP (Data)	Over Claim	% Over Claim
81,950	79,998	1,952	2.4%
82,385	80,741	1,644	2.0%
83,039	80,964	2,075	2.5%
83,512	81,378	2,134	2.6%
83,195	82,209	986	1.2%
85,278	82,043	3,235	3.8%
85,595	83,073	2,522	2.9%
86,182	83,727	2,455	2.8%
86,613	84,700	1,913	2.2%
84,887	83,891	996	1.2%
83,170	81,975	1,195	1.4%
82,205	80,419	1,786	2.2%
84,001	82,093	1,908	2.3%

Figure XX-2: True-Up Table

It is, of course, to the benefit of those customers allocated to 0% of poverty for the Company to give the benefit to the customer and allocate customers with unknown poverty levels to the tier with the higher discount. However, PECO needs to be able to show the right customers are assigned to the correct discounts. For evaluation purposes cases recorded at 0% of poverty from the study, where possible, are excluded. Cases with poverty indicators from 1 to 50% of poverty were used.

Figure XX-3, Column 6 shows this difference, in detail.

Although the payment data provided for the evaluation database is adequate, the billing data was provided in a form that requires the independent programming of a utility billing system to organize it in a form that will permit the forms of analysis usually submitted to the Bureau of Consumer Services. This placed constraints on the billing/payment analysis in this report, but should be resolved by midsummer.

Finally, we note that there are often large gaps of several months in the meter reads for persons in the 0-50% of poverty group.

PECO CAP & Confirmed Low-Income Households, 2000									Not Included	Check
Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col.9	Col. 10	Col. 11
Month	Poverty Level Block					Total CAP	Not in CAP (LITS)	Confirmed Low-Income	Accounts Not in Service	Evaluation Database Check Total
	1-50%	51-100%	101-150%	151% +	CAP: Unidentified Poverty Level					
Jan	12,812	25,076	13,727	4,468	23,915	79,998	113,531	193,529	45,369	238,898
Feb	13,187	25,628	14,052	4,513	23,361	80,741	114,254	194,995	43,903	238,898
Mar	13,549	26,055	14,362	4,549	22,449	80,964	114,867	195,831	43,067	238,898
Apr	14,003	26,686	14,654	4,598	21,437	81,378	116,121	197,499	41,399	238,898
May	14,444	27,511	15,029	4,697	20,528	82,209	117,701	199,910	38,988	238,898
Jun	14,731	28,241	15,423	4,748	18,900	82,043	118,647	200,690	38,208	238,898
Jul	15,295	29,363	16,010	4,843	17,562	83,073	118,539	201,612	37,286	238,898
Aug	15,872	30,222	16,426	4,779	16,428	83,727	119,034	202,761	36,137	238,898
Sep	16,577	31,197	16,902	4,685	15,339	84,700	119,663	204,363	34,535	238,898
Oct	16,995	31,688	17,094	4,375	13,739	83,891	121,464	205,355	33,543	238,898
Nov	17,197	31,867	17,021	3,983	11,907	81,975	124,131	206,106	32,792	238,898
Dec	17,547	32,023	17,004	3,627	10,218	80,419	126,732	207,151	31,747	238,898
Average	15,184	28,796	15,642	4,489	17,982	82,093	118,724	200,817	38,081	238,898

Source: Evaluation Database, Run Revision of 5/4/2002.

Figure XX-3: The Evaluation Database for the Study.



Survey

XXI UNIVERSAL SERVICE SURVEY QUESTIONS

The survey questions follow this page.

PECO Universal Services
Process Evaluation Survey Questions
Revised 3/15/02

Hello, my name is _____. Thank you for taking the time to participate in our survey about some of PECO's programs. I am an independent contractor, working with several others, who have been hired by PECO. I will be asking questions about your experiences with PECO and some questions to find out more about you. Your answers will help us better understand how these programs work and help us find ways to improve them in the future.

Answers to this survey will be reported as a group, without identification of the person who answered the questions. PECO will only see the answers reported for the group as a whole.

If you agree to participate in this survey, Please read and sign the following consent form. At the end of the survey we will pay you \$25 for your help today.

You may ask me any questions you would like if you need help to understand the question.

CONSENT

I agree to participate in this survey. I understand my answers will be written down and that participation in the survey is by my own free will and it is completely voluntary. If there are any questions that I do not want to answer, I will simply choose not to answer them.

I understand that my answers are not confidential, because, for example, the independent program evaluators may see the completed survey form.

I understand that NO reports will use my name to identify my answers. And, I understand that the results of the survey will be presented using information from all the people who participated, and reports will present results for the group as a whole.

Name

Date

PECO Universal Services
Process Evaluation Survey Questions
 Revised 3/15/02

INTERVIEWERS: Circle the number or letter of the response given, and write notes clearly.

A1. For our future interviews with other people, could you tell me if there are Agencies or locations where you would have gone for an in-person interview?

1. Yes: _____
2. No _____

SECTION A: ENERGY USE AND BILLS

A2. Do you have trouble controlling or managing energy use in your home?

1. Yes (**Answer A2a**)
2. No Probe why not _____ then **Skip to A3**)
3. Don't know (**Skip to A3**)

A2a: If yes,

Why? (Circle the response; probe if necessary)

1. Poor housing stock (old building, broken windows, leaking walls, etc.)
2. Furnace malfunctions or heater broken
3. No money to make improvements
4. Lack of knowledge regarding ways to save energy
5. Central heating; no way to control individual use
6. Poor quality or old windows (for broken windows, circle 1)
7. Other: specify _____

A3. How do you heat your home? (*Mark the unaided answers, then ask specifically each option not mentioned*)

	Unaided (yes)	Aided (yes)
1. Gas	_____	_____(mark A4=1 & go to A5)
2. Electricity	_____	_____(Go to A4)
3. Kerosene	_____	_____(Go to A3a)
4. Space Heaters	_____	_____(Go to A3a)
5. Oven	_____	_____(Go to A3a)
6. Propane heaters	_____	_____(Go to A3a)
7. Don't Know	_____	
8. Other (specify) _____		

A3a. How long have you used (*this heating source*) to heat your home?
 _____ (months or years—specify)

If more than one heating sources is used, indicate which one they are talking about:

Process Evaluation Survey Questions

A3b. Since you have been using (*this heating source*) have you noticed if people in your home have been sick more often than when you did not use *this heating source*?

1. Yes A3c. Describe why you think this (What happened?)
2. No

A3d Do you have worries or concerns about using these heating sources?

1. Yes A3e If Yes: Why?

2. No

A4. Have you ever heated your home with natural gas?

1. Yes (*Continue*) *Mark Yes if A3 is marked for Gas heat*
2. No (**Skip to A7**)

A5. Who is (was) your Gas supplier?

1. Philadelphia Gas Works (PGW)
2. Philadelphia Electric Company (PECO)
3. Other, specify _____
4. Don't Know

A6. During the past 12 months, have you been able to make your minimum monthly payment for your **gas bill**? (*Either PECO or PGW*)

1. Yes
2. No

A6a. If no: Why haven't you been able to make your minimum gas bill?

A7. How about your **electric bill** to PECO, have you been able to make your minimum monthly payment on this for the past 12 months?

1. Yes
2. No

A8. Which seems harder for you to pay on a regular basis, your gas or electric bill?

1. Gas
2. Electric
3. Both – they are both equally hard to pay
4. Neither are difficult

A9. Has your gas or electric service ever been shut off?

1. Yes (*Continue*)
2. No (**Skip to A11.**)

A10. Why were you having difficulty paying your gas or electric bill at the time your service was terminated? (*Open ended*)

A11. Do you own or rent your current home?

1. Own
2. Rent

Process Evaluation Survey Questions

3. Other, specify _____
- A12. Do you have full local telephone service?
1. Yes
 2. No

SECTION B: QUESTIONS ABOUT EXPERIENCE WITH PECO AND PERCEPTIONS OF UNIVERSAL SERVICES

Now I'd like to talk a little about your experiences with PECO and some of their programs.

- B1. Have you ever heard about any of PECO's programs for helping customers with their energy bills?
1. Yes
 2. No

- B2. Have you ever heard about the Universal Services Program or PECO's low-income programs?
1. Yes
 2. No

- B3. Which of the PECO's programs have you heard about?
(Mark all mentioned unaided first. Then PROBE if **not** mentioned. Ask about each item)

	Unaided	Aided	
	Yes	Yes	No
1. Never heard of US before today	_____	_____	_____
2. "CAP RATE" program	_____	_____	_____
3. Weatherization Program (LIURP)	_____	_____	_____
4. CARES	_____	_____	_____
5. A. LIHEAP Cash grants	_____	_____	_____
B. LIHEAP Crisis grants	_____	_____	_____
6. MEAF or UESF	_____	_____	_____
7. Other energy assistance	_____	_____	_____
8. Don't know	_____	_____	_____

READ TO ALL: Universal Service is a set of programs that helps ensure that all customers receive continuous electric and gas service by finding ways for customers to better manage their energy use and afford to pay their bills.

- B4. What do you think about the Universal Services Program?
(DO NOT READ. Check all that apply)
1. A good program for low-income and poor customers _____
 2. Not a good program for low-income and poor customers _____
 3. The program needs improvement _____
 4. The program helps me pay gas and/or electric bills _____
 5. Any other: Specify _____

Process Evaluation Survey Questions

- B5. Where have you heard the term "Universal Services" used?
1. Have not heard it before this survey
 2. PECO Representative
 3. Nonprofit Agency
 4. Newspaper
 5. TV/Radio
 6. Other: _____
 7. Don't recall
- B7. Have you ever called the Universal Service or CAP RATE 800 number?
1. Yes

B7a. If yes: For what reason? _____
 2. No (*Skip to B6 below*)
- B8. Were you satisfied with the answer to your question or concern?
1. Very satisfied
 2. Moderately satisfied
 3. Neutral
 4. A little dissatisfied
 5. Very Dissatisfied (*Answer B8a*)

B8a. Why were you not satisfied with the response? _____
- B6. How helpful have the programs you're familiar with been to you? Would you say (*read responses*)
1. It has been very helpful
 2. It has been somewhat helpful
 3. Neutral—neither helpful nor unhelpful
 4. It has been somewhat unhelpful
 5. It has not been helpful at all
- B9. Have you been treated courteously by the people involved in the Universal Services programs?
1. Yes
 2. No

B9a. If no: What happened? _____
 3. No opinion
- B10. Was it hard to apply for any of PECO's Universal Services programs?
1. I didn't sign up for anything
 2. Yes
 3. No

B10a. If yes: Why was it hard? _____

Process Evaluation Survey Questions

B11. Have you ever obtained any financial assistance to help pay your overdue utility bills?

1. Yes

B11a. If yes: Which bills?

1. PECO bill
2. PGW bill
3. Water bill (Water Revenue Bureau)
4. Oil
5. Don't know

2. No

3. Don't know

B12. Did you get any help with your heating or utility bills **in the last 12 months?**

1. Yes (**Answer B12a**)

B12a. If yes: From what source? PROBE (*Read the list*):

1. LIHEAP cash grant (Low Income Heating Assistance Program)
2. LIHEAP CRISIS
3. MEAF or Hardship Fund or UESF
4. Other, specify _____
5. Don't remember

2. No

3. Don't know

B13. Have you ever wanted help with your PECO bill but couldn't get it?

1. Yes (**Answer B13a**)

B13a. If yes: What happened? (*Do not read*)

1. Did not know where I could get help
2. Tried to get help but was unsuccessful (general)
3. I did not qualify for help, was turned down
4. Too much trouble, red tape required to get help
5. Did not want to provide information required to get help
6. Other _____
7. Don't recall

2. No

B14. When you pay your PECO bill, do you mail it to PECO or do you pay your bill in person at a location close to home?

1. Mail it to PECO (**Skip to B15**)

2. Pay in person at a PECO pay station (**Answer B14a**)

3. Sometimes mail it and sometimes pay in person (**Answer B14a**)

4. Don't know; someone else pays the bill (**Skip to B15**)

If answer #2 or #3, ask:

B14a. When you pay in person, do you have to pay an extra fee, like one or two dollars in addition to your bill?

1. Yes. _____ \$
2. No
3. Don't know

Process Evaluation Survey Questions

- B15. Have you ever heard anyone say a PECO pay station is "authorized" or "unauthorized"?
1. Yes
B15a. If yes: What do you think it means? (*no assist*)
 2. No

- B16. How easy do you feel it is to read your PECO bill each month?
1. Very easy to read
 2. Somewhat easy to read
B16a. If 1 or 2: What do you like or find easy about the bill?
 1. Lots of good information
 2. Just the right amount of information
 3. Clearly presented
 4. Easy to get to the bottom line
 5. Don't know
 6. Other _____
 3. Neither easy or no easy
 4. Somewhat hard to read
 5. Very hard to read
B16b. If 4 or 5: Why?
 1. Too much information on the bill
 2. Poorly designed
 3. Hard to find the bottom line of how much to pay
 4. Don't know
 5. Other _____

SECTION C: CURRENT CAP RATE STATUS

*Now I am going to ask some questions about PECO's CAP programs. **These are programs that place a limit on the rate you pay for your electricity or gas if you agree to make your payments on time.***

- C1. Have you ever been on CAP RATE?
1. Yes
 2. No
 3. Don't Know
- C1a. If no or don't know, ask:** Have you ever paid less than the **regular rate** for your PECO electric or gas bill?
1. Yes (**Continue with C2**)
 2. No (**Skip to SECTION E**)
 3. Don't know (**Skip to SECTION E**)

Process Evaluation Survey Questions

***** CAP ONLY *****

- C2. Did you participate in the old CAP Program that ended in 1998?
1. Yes

C2a. *If yes:* Do you remember if your monthly payments were more, less, or about the same as you pay each month now?

 1. More
 2. Less
 3. About the same
 4. Can't remember
 2. No
 3. Don't know
- C3. Are you on CAP RATE now?
1. Yes
 2. No
 3. Don't know
- C4. How did you hear about CAP RATE?
1. PECO rep told me about it when I called with payment problems
 2. Nonprofit Agency
 3. Newspaper
 4. TV/Radio
 5. Other : _____
- C5. Why did you apply for CAP RATE? _____
- C6. Do you remember when you started on the CAP RATE? _____ month/year _____
- C7. Once you applied for CAP RATE, how long did it take for you to be placed on CAP RATE and start paying the new rate?
1. It happened immediately -- the new rate was on my next bill
 2. One month
 3. Two months
 4. Three months
 5. More than 3 months
 6. Don't know when the RATE took effect
- C8. To be on the CAP RATE, you have to provide information about your income status to PECO. Was it clear what income information PECO wanted you to provide?
1. Yes
 2. No
 3. Don't recall

Process Evaluation Survey Questions

C9. Did you have any difficulty providing this income information?

1. Yes

C9a. If yes: Why is that? (Do not read)

1. Hard to get the documents
2. Too much paperwork
3. Did not have everything they wanted
4. Difficulty sending it to PECO (taking it in or mailing it)
5. Did not want to provide the information
6. Don't recall
7. Other _____

2. No

C10. What was your **AVERAGE** monthly PECO bill **before** you started CAP RATE?
\$ _____ per month

Interviewer: please confirm that this is Electric or Combined Gas and Electric bills from PECO.

C10b. Electric _____ Combined Gas and Electric _____

1. Less than \$10/month
2. Between \$10 and \$25
3. Between \$25 and \$50
4. Between \$50 and \$75
5. Between \$75 and \$100
6. Over \$100 per month (if higher than that, have them guess _____)
7. Don't know

C10c. If respondent gets a separate PGW bill for gas, what is your average PGW gas bill?

\$ _____ per month

1. Less than \$10/month
2. Between \$10 and \$25
3. Between \$25 and \$50
4. Between \$50 and \$75
5. Between \$75 and \$100
6. Over \$100 per month (if higher than that, have them guess _____)
7. Don't know

C11. What is the highest PECO bill you have paid in the past 12 months? _____
Don't know highest bill (check here) _____

C11a. What month was that? (summer or winter?) _____

C12. Is the CAP RATE you are paying now: (Read and rotate responses)

1. More affordable than what you were paying before
2. Still too high
3. Not much difference/about the same
4. Don't know/refused

Process Evaluation Survey Questions

- C13. Do you know how much your payment is discounted on CAP RATE?
1. Yes

C13a. If yes: How much is it discounted from the regular rate?
(do not assist) _____ percent for _____
 2. No
 3. No answer given
- C14. What is your **AVERAGE** monthly PECO bill **AFTER** you started CAP RATE?
\$____ per month
1. Less than \$10/month
 2. Between \$10 and \$25
 3. Between \$25 and \$50
 4. Between \$50 and \$75
 5. Between \$75 and \$100
 6. Over \$100 per month (if higher than that, have them guess_____)
 7. Don't know
- C15. How satisfied are you with CAP RATE? Would you say (*read responses*)
1. Very satisfied
 2. Moderately satisfied
 3. Neutral
 4. A little dissatisfied (**Answer C12a**)
 5. Very dissatisfied (**Answer C12a**)
- If answer #4 or #5, ask**
- C15a. Why are you dissatisfied with CAP RATE? (*specify*)
- C16. When you signed up for CAP RATE, did PECO tell you what would happen if you didn't pay your bill?
1. Yes

C16a. If yes: What would happen? (*open ended, no assist*)
 2. No
 3. Don't remember
- C17. Is there anything else you would like us to know about your experiences with CAP RATE (*such as when you applied, or about making payments, interactions with PECO, bill adjustments, disputes etc.*)?

SECTION D: CAP RATE RE-CERTIFICATON – CAP ONLY

- D1. Have you heard the words "reverify," or "recertify" regarding CAP RATE?
1. Yes
 2. No

Process Evaluation Survey Questions

- D2. When you signed up for CAP RATE, did the representative talk to you about the re-certification process?
1. Yes
 2. No
 3. Don't know

- D3. Do you know that you have to sign up every year to receive CAP RATE?
1. Yes
 2. No

You said you started CAP RATE in _____. (question C6, page 7) That's been _____ months:

*If more than 11.5 months, continue. If less than 11.5 months, **Skip to the next section** and Say: PECO will contact you when it is time to recertify for CAP RATE*

- D4. Do you remember getting a letter from PECO asking you to call an 800 number to review your income so you could continue paying the CAP RATE?
1. Yes
 2. No

- D5. The letter said that you had 10 days to call and provide PECO with your income information. Do you remember making the call?

1. Yes (**Skip to D6**)
2. No (**Answer D5a**)

D5a. If no, Do you remember getting a **second letter** asking you to call the 800 number to verify income in order to stay on CAP RATE?

1. Yes
2. No

- D6. Did you call PECO or send in information so you could stay on CAP RATE? (*Ask everyone. assist if needed*)

1. **Did not call PECO or send in anything:**

D6a. If answer #1 ask: Why didn't you call or send in anything?

D6b. Did you get removed from the CAP RATE?

1. Yes
2. No
3. Don't know

2. **Called PECO:**

D6c. If answer #2 ask: What happened when you called?

1. They said I did not qualify any more
2. They asked me to send in income information
3. Provided income by phone
4. Don't remember

Process Evaluation Survey Questions

D6c3. if provided income by phone, mark one:

1. Income qualified by phone
2. Did not qualify & rejected by phone

D6d. if answer D6c-2 (they asked me to send income information) ask: Did you send anything?

1. Yes
2. No
3. Don't know

3. Sent income information to PECO:

D6e. If answer #3 ask: What happened when you sent information?

1. They said I did not qualify any more
2. They asked me to send more information
3. Don't know

D6f. if answer D6e-2 ask: Did you send anything?

1. Yes
2. No
3. Don't know

D6g. Did you get removed from the CAP RATE?

1. Yes
2. No
3. Don't know

4. Other answer given:

D7. Did you use the self addressed stamped envelope to send the income information to PECO?

1. Yes
2. No
3. Don't remember getting one
4. Don't remember how I sent it in
5. Other _____

D8. Is there anything else you would like us to know about your experience with the re-certification process? (*Open ended, no assistance*)

*****END OF CAP-ONLY SECTIONS*****

SECTION E: ARREARAGE FORGIVENESS

E1. In the past year, how many months in a row have you made your full monthly CAP RATE payments on time? _____ months *Don't know (check here)* ____

E2. Do you know if a past due balance can be forgiven when you are on CAP RATE?

1. Yes

E2a. If yes: What has to happen for PECO to forgive a past-due bill? (*no assist*)

2. No
3. Don't know

Process Evaluation Survey Questions

E3. When you started on CAP RATE did you have a past due balance?

1. Yes
2. No
3. Don't know
4. Not on CAP Rate

If yes to E3, ask Questions E3a through E3e

E3a. What happened to that past-due balance when you started on CAP RATE? Don't know (check here) _____

E3b. How much was the past-due amount? \$ _____
Don't know (check here) _____

E3c. Has this amount been forgiven?

1. Yes

E3d. How much was forgiven? \$ _____

E3e. When? _____ month _____ year

2. No
3. Don't know

E4. Is there anything else you would like us to know about your experience with past-due bills or forgiveness of past due balances? (*Open ended, no assistance*)

SECTION F: PAYMENT ARRANGEMENTS

F1. Did you know you could call PECO to make a payment arrangement if you were having trouble paying your PECO bills?

1. Yes
2. No

F2. About how many times during the past 12 months have you talked to PECO about making a payment arrangement, but did not necessarily make a payment arrangement?

1. 1-2 times
2. 3 or more times
3. zero

F3. Have you made a payment arrangement with PECO within the past 12 months?

1. Yes (**Answer F3a, b, c**)
2. No

F3a. If yes, How many payment arrangements have you made in the last year? _____ arrangements

F3b. For CAP ONLY: How many payment arrangements have you made since you started on CAP RATE?
_____ arrangements

F3c. If yes—CAP or not, What were the terms of the last payment arrangements that you made? (*monthly payment amount, number of months*)

Process Evaluation Survey Questions

- F4. Have you tried to make a payment arrangement and were told you could not have one?
1. Yes

F4a. If yes: What was the reason you could not have a payment arrangement?
 2. No
- F5. Have you been offered a payment arrangement but the payment amount was still not affordable?
1. Yes

F5a. If yes: What did you do?
 2. No
- F6. Is there anything else you would like us to know about your experience with payment arrangements? (*open ended, no assistance*)

SECTION G: CARES

- G1. In the last year, how many times have you called PECO for any reason?
1. Never (**Skip to Section H.**)
 3. Once
 4. 2-5 times
 5. 6-10 times
 6. More than 10 times
- G2. What agencies or programs were you referred to?
(**MARK ALL MENTIONED**)

1. None – not referred to any agencies	2. Not referred to any programs
3. Weatherization from PECO (LIURP)	4. Catholic Charities
5. MEAF	6. LIHEAP
7. CRISIS	8. UESF
9. Project REACH	10. Chester County CARES
11. DELCO Shares its Warmth	12. Mason Dixon CARES
13. Project HEAT	14. WAP
15. Food Stamps	16. SSI
17. TAG Housing Assistance	18. Heater Hotline
19. Blind Relief Fund	20. Episcopal Community Services
21. Emergency Repair Hotline	22. Basic Systems Repair Program
23. Senior Housing Assistance and Repair Program	24. Other, specify

Process Evaluation Survey Questions

- G3. Did you call the PECO customer service number or the Universal Services 800 number when you were referred to other programs that could help you?
(assist if needed)
1. CAP RATE 800 number
 2. Universal Service 800 number
 3. PECO Customer Service number from the back of the bill
 4. PECO Customer Service number from the phone book
 5. Don't know
- G4. Is there anything else you would like us to know about your experience with PECO's referral services? (Open ended, no assistance)

SECTION H: SERVICE TERMINATION

H1. We asked at the beginning of the survey whether your gas or electric service has ever been terminated. Specifically, has your PECO gas or electric service been terminated (shut off) for any reason?

1. Yes
 2. No
- Ask H10 of everyone**

H10. Have you ever used a medical certificate to stop termination?

1. Yes

H10a. If yes: How many times have you used a medical certificate?

H10b. When (month/year) did you use a medical certificate? _____

2. No

If No to H1 and H10 above, Skip to the Next Section, Contacting PUC

H2. Was it your PECO gas or PECO electric service that was shut off?

1. Electric
2. Gas
3. Both

H3. Do you remember when your service was shut off? (if both, which _____)
_____ month _____ year (If don't remember, ask SEASON _____)

H4. **For CAP ONLY** - How long did you participate in CAP RATE before your service was shut off?

1. Shut off before CAP RATE
2. 1 - 3 months on CAP RATE
3. 4 to 6 months
4. 7 to 9 months
5. 10 to 12 months
6. More than 12 months
7. Don't remember

Process Evaluation Survey Questions

- H5. How many payments did you miss before your service was shut off? ____
Don't know _____
- H7. How many shut off notices did you get before your service was shut off?
1. One
2. Two
3. Three
4. More than 3
5. Don't know
- H8. Did you contact PECO before you were terminated?
1. Yes
H8a. If yes: How many times? _____
2. No
- H9. Did someone from PECO contact you one last time before service was shut off?
1. Yes
H9a. If yes: What kind of contact was it?
1. Phone
2. Mail
3. Both
4. Other _____
- H9b. Did the PECO representative try to help you so service would not be shut off?
1. Yes
2. No
- H11. How soon after your last shut off notice was your service terminated?
1. Less than 2 days
2. 2 days
3. 3 days
4. More than 3 days
- H12. Did you restore your service?
1. Yes (**Answer H12a--d**)
2. No (**Answer H12e--f**)
- If yes, service is restored**
- H12a. How quickly was your service reconnected after you called PECO?
_____ Actual length (hours/days)
- H12b. How long was your service terminated? ____ (hrs /days/ mo)
- H12c. What did you have to do to get the service restored? (*borrow money, call PECO, etc. probe if needed*)
- H12d. How much money did you have to pay to get your service restored, including deposits, reconnection fee and past due amount? \$ _____

Process Evaluation Survey Questions

If no, service is not restored, ask the following.

H12e. Why isn't service restored?

H12f. What is your current plan for getting service restored?

H13. Why were you having difficulty paying your utility bill at the time your service was shut off? (*Open ended, probe if needed*)

H14. **For CAP ONLY** - When you began having trouble paying your CAP RATE bill, did you request a payment agreement? (*assist as needed*)

1. Yes, but I could not afford the amount they wanted me to pay and had to refuse the offer
2. Yes, but they would not give me one because I had too many already
3. Yes, I got an arrangement but could not make the payments after that
4. No
5. Don't remember
6. Other answer, specify

H15. Is there anything PECO could have done that may have prevented the termination of your service?

1. Yes

H15a. If yes, What could PECO have done?

2. No

H16. Is there anything else you would like us to know about your experience with service termination? (*Open ended, no assistance*)

SECTION I: CONTACTING PUC OR BCS

I1. Have you ever contacted the Public Utilities Commission, Bureau of Consumer Services, or other legal aid organization regarding your PECO services?

1. Yes (**Answer I1a and I1b**)

If Yes,

I1a. Why did you contact the PUC, BCS, or other legal aid?

I1b. What happened after you contacted the PUC, BCS, or other legal aid?

2. No

I2. When you have a problem with your PECO services, which group do you feel is most effective at helping you resolve that problem?

2. PECO
3. PUC
4. BCS
5. Legal Aid
6. Other _____

Process Evaluation Survey Questions

Interviewer: Include in "other" things like "none of these agencies" or "I've never had a problem and have no experience to with these agencies" etc. Please specify response.

SECTION K: WEATHERIZATION AND ENERGY EDUCATION

- K1. Has your home been audited or provided with energy conservation measures through PECO's Weatherization program (Low Income Usage Reduction Program – LIURP)?
1. Yes
 2. No
 3. Don't know
- K2. Have you ever received energy education services or materials from PECO?
1. Yes
 2. No
 3. Don't know
- K3. Have you ever inquired about energy conservation services through PECO?
1. Yes

K3a. If yes: What happened?

 1. Found out about programs and participated
 2. Found out about programs and did not participate
 3. Did not find out about any programs
 4. Don't recall
 2. No
 3. Don't recall
- K4. What actions have you taken on your own to conserve or save energy in your home? (*Do not read – Circle all that apply*)
1. None
 2. Low cost weatherization (weather stripping, gasket insulation, window film)
 3. Turned down thermostat/heater in winter
 4. Turned air conditioner down or off in summer
 5. Repaired broken windows or doors
 6. Major repairs – roof replacement, etc.
 7. Replaced old heating system
 8. Replaced old appliances (water heater, refrigerator)
 9. Turn off lights in unused rooms
 10. Replaced light bulbs with energy efficient bulbs
 11. Don't know
 12. Other _____
- K4a. Did any organization help you with this work by providing information or services?
1. Yes: What organizations? _____
 2. No

Process Evaluation Survey Questions

- K5. What do you think could happen if you tried to save energy at home?
(**Interviewer:** *don't read the list, but check all that apply. Add any other items not listed*)
1. My bill could go down and I could save money.
 2. My bill could go up.
 3. Nothing will happen.
 4. If I use less someone else will get to use more.
 5. I could use less electricity or gas.
 6. I could help the environment.
 7. I could help the utility company keep energy prices low.
 8. It will improve the country's energy future.
 9. Other
- K6. Is there anything you would like us to know about your experience with trying to save energy? (*open ended, do not assist*)

SECTION L: CUSTOMER CHOICE

- L1. Do you remember receiving information that told you that you had a choice in your gas or electric service provider and you could switch suppliers?
1. Yes (*Continue*)
 2. No (**Skip to L4**)
 3. Don't know (**Skip to L4**)
- L2. Did you decide to switch suppliers?
1. Yes, decided to switch suppliers

L2a. **If yes:** Which supplier did you switch?

 1. Gas
 2. Electric
 3. Both

L2b. Who is the supplier(s) you switched to? _____

L2c. Has switching made a difference in the amount of your bill?

 1. Higher than before
 2. Lower than before
 3. Doesn't seem to make a difference

L2d. Did you switch back?

 1. Yes
 2. No
 3. Don't know
 2. No, decided not to switch suppliers

L2e. Why did you decide not to switch suppliers?
 3. PECO decided to switch me without my knowledge or permission

Process Evaluation Survey Questions

L3. Are you satisfied with your decision to switch or not switch suppliers? Would you say (*read responses*)

1. Very satisfied
2. Moderately satisfied
3. Neutral
4. Moderately dissatisfied (**Answer L3a**)
5. Very dissatisfied (**Answer L3a**)

If answered #4 or #5, ask

L3a. Why aren't you satisfied with your decision to (*or not to*) switch?

L4. Were you ever switched to another supplier without asking to be switched?

1. Yes

L4a. If yes: Did you switch back to PECO?

1. Yes
2. No
2. No
3. Don't know

L5. Is there anything else you would like us to know about choosing other suppliers?

SECTION M: OVERALL SATISFACTION WITH PECO

M1. Thinking about all of PECO's programs we have talked about, how satisfied are you with these programs?

1. Very satisfied
2. Moderately satisfied
3. Neutral
4. Moderately dissatisfied
5. Very dissatisfied

M2. Thinking now about the service you receive from PECO representatives, how satisfied are you with the service you have received?

1. Very satisfied
2. Moderately satisfied
3. Neutral
4. Moderately dissatisfied
5. Very dissatisfied

M3. Have you ever been treated disrespectfully by any of PECO's representatives?

1. Yes

M3a, If yes: What happened?

2. No.

Process Evaluation Survey Questions

SECTION N: PARTICIPANT HEALTH

We have finished the questions about PECO Energy and it's programs. The last set of questions is for categorization purposes so we can group your answers with others. These questions deal with your education, financial situation, health and life events. Please tell me if you don't wish to answer a question if it makes you feel uncomfortable.

First, we are interested in how peoples' health affects their ability to maintain self-sufficiency.

N1. In general, would you say your health is

1. Excellent
2. Very good
3. Good
4. Fair (Answer N1a)
5. Poor (Answer N1a)

N1a. How much do your health problems keep you from doing the activities most people do?

1. A lot
2. Some
3. A little
4. Not at all

N2. Does anyone living with you in your home have a health problem?

1. Yes

N2a. If yes: What is the health problem?

2. No
3. Don't

N2B. Does anyone in your household have asthma, or asthma-like symptoms, or breathing problems?

1. Yes
2. No
3. Don't know

N3. Do you think people in your household have more sickness today, less sickness, or about the same amount of sickness as they did five years ago?

1. More
2. Same
3. Less
4. Don't Know

N4. Do you think people in your neighborhood have more sickness today, less sickness, or about the same amount of sickness as they did five years ago?

1. More
2. Same
3. Less
4. Don't Know

Process Evaluation Survey Questions

N5. Do you have health coverage for you and your family?

1. Yes, me and my family (*Answer N5a*)
2. Just for myself (*Answer N5a*)
3. No (*Skip to N6*)

If answer #1 or #2, ask

N5a. Do you have to pay for all or part of your health coverage?

1. All
2. Part
3. Other, specify _____
4. No, Who pays for the insurance? _____

N6. Do you think you and the people in your home are getting adequate preventive health care?

1. Yes
2. No
3. Other _____

SECTION O: LIFE EVENTS

O1. In the past six months, did any of these events occur?

Event	Check if Yes
a) There was not enough money to buy something important needed for the family, such as food or clothing.	
b) Looked for a job—made contacts, calling, applying, or interviewing.	
c) Did not have enough money to pay the bills.	
d) Had contact with unemployment or welfare office.	
e) Child leaving home (for any reason, e.g., custody change, emancipated, college, marriage)	
f) Paid the bills.	
g) Family schedule was <u>seriously disrupted for more than one day</u> because of something unexpected.	
h) Contact with a lawyer or the legal system.	
i) Childcare problems with babysitters, daycare center, etc., such as trouble with existing childcare or being unable to find childcare.	
j) Marriage in the immediate family	
k) Birth in the immediate family.	
l) Death in the immediate family.	
m) An unexpected repair was necessary for a major household item.	
n) Began a new school experience at a higher academic level (GED, college, graduate school, vocational, technical or professional school, or elementary school)	
o) Major change in living conditions (moved, remodeling, neighborhood change, home deterioration, lost mode of transportation)	
p) Fell behind in your rent or mortgage payments	
q) Unable to get medical care	
r) Was a victim of crime	
s) Fell behind in your gas, electric, water or phone bills	
t) Forced out of a job training program or education program	
u) Unable to pay for adequate transportation to get to work or school	
v) Had trouble paying a credit card balance	
w) Provided financial or other help to someone who is not living with you	

Process Evaluation Survey Questions

SECTION P: EMPLOYMENT

- P1. What is your current employment status
1. Full Time (30 or more hours per week at one job)
 2. Part Time (less than 30 hours per week at one job)
 3. More than one Part Time job (less than 30 hrs/week at each job)
 4. Currently in a job training program, or a student
 5. No regular work, but work on and off, or seasonal
 6. Do not work outside the home
 7. Currently unemployed
 8. No data
 9. Retired/Pension
 10. Workers Comp
 99. Refused

- P2. How many months were you employed during the last two years?
_____ Months
00 = No employment in the last two years.
99 = No data

- P3. If unemployed now, how long have you been unemployed?
_____ Months (**Go to FINANCIAL DATA below**)

If working, continue:

- P4. How long is your commute to work or school?
1. Half an hour or less
 2. Half an hour to an hour
 3. One to two hours
 4. More than two hours

- P5. How do you get to work or school?
1. Car
 2. Bus
 3. Train
 4. Bicycle
 5. Walk
 6. Other, specify _____

- P6. Do you have to pay for union dues, uniforms or cleaning of uniforms, or tools for your job?
1. Yes, Specify _____
 2. No

SECTION Q: FINANCIAL DATA

- Q1. How would you rate your own financial situation today? Would you say it is excellent, good, only fair or poor?
1. Excellent
 2. Good
 3. Only Fair

Process Evaluation Survey Questions

4. Poor
- Q2. Which of the following categories best characterizes your current household gross annual income **BEFORE TAXES AND OTHER DEDUCTIONS**?
- | | |
|----------------------|--------------------|
| 1. \$0 – 5,000 | 6. 40,001 – 50,000 |
| 2. 5,001 – 10,000 | 7. over 50,000 |
| 3. 10,001 – 20,000 | 8. Don't know |
| 4. 20,001 – 30,000 | 9. Refused |
| 5. 30,001 to 40,000. | |
- Q3. Which of the following categories best characterizes your current household net monthly income **AFTER TAXES AND OTHER DEDUCTIONS**?
- | | |
|--------------------|---|
| 1. \$0 – 500 | 6. 2,501 – 3,000 |
| 2. 500 – 1,000 | 7. over 3,000 |
| 3. 1,001 – 1,500 | 8. Don't know |
| 4. 1,501 – 2,000 | 9. Refused |
| 5. 2,001 to 2,500. | 10. Varies too much to say (go to Q4a.) |
- Q4. Over the past year, how much or how often has your monthly income varied?
1. Not at all/ almost never
 2. A little/occasionally or rarely
 3. Somewhat/sometimes (**Answer Q4a**)
 4. A lot/frequently or every month (**Answer Q4a**)

If answered #3 or #4, ask

Q4a. Why does your income vary? (is it something within respondent's control, or outside like welfare changes etc.)

- Q5. People include different things when they report income. There is no right or wrong way to report income. **Please indicate if you included any of the following in the household income you just reported.**

(Read: Mark all that apply)

1. Child support	2. Food stamps
3. TANF	4. General Assistance
5. Medicare/Medicaid	6. Unemployment compensation
7. Loans from family/friends	8. Gifts of money from family/friends
9. Section 8	10. Social Security Disability
11. Social Security Supplemental Security Income	12. Workers Compensation
13. Health Plan benefits	14. Special Grants
15. Pension	16. Other (specify):
17. Wages	18. None of these

Process Evaluation Survey Questions

Q6. Are you currently receiving any of these types of assistance?
(Read: Mark all that apply)

1. Food stamps	2. TANF
3. General Assistance	4. Medicare/Medicaid
5. Unemployment compensation	6. Loans from family/friends
7. Gifts of money from family or friends	8. Section 8
9. Social Security Disability	10. Social Security Supplemental Security Income
11. Workers Compensation	12. Health Plan benefits
13. Special Grants	14. Pension
15. Reduced or free school lunches	16. Other (specify):

Q7. In the last year, have you used other community resources for food, housing, or clothing etc.?

1. No community resources used	5. Food pantries
2. Soup kitchens	6. Emergency housing-shelters, etc.
3. Toys for tots or similar resource agency for toys	7. Sources for Free clothing
4. Free counseling	8. Other Social Services
9. Other (specify)	

Q8. During the past 12 months, did anyone living in your household have what you would consider to be a major change in income?

1. Yes (**Answer Q8a**)
2. No

Q8a. If yes: Did it go up or down? ___ Up ___ Down

Q8b. What caused the change? (*Positive or negative reasons; open ended*)

Q9. What are your major ongoing bills?

1. Food/groceries	7. Car repairs
2. Gasoline	8. Rent or mortgage
3. Nursing home care or care for dependant adult	9. College or technical/vocational school expenses
4. Car payments	10. Childcare
5. Credit cards	11. Other (specify)
6. Utilities (phone/electricity/gas/water)	

Q10. In the past 12 months, did you have any unexpected expenses that made it hard for you to pay your monthly bills?

1. Yes

Q10a. If yes What kind of expenses were they? (*open ended*)

2. No
3. Don't know

Process Evaluation Survey Questions

- Q11 In general, how do your finances usually work out at the end of the month? Do you feel that you usually end up with:
1. Some money left over at the end of the month
 2. Just enough money to make ends meet
 3. Not enough money to make ends meet
- Q12. I'd like to know what you think is the least amount of money a family of four can get by on in a year. \$ _____/year
- Q13 Compared with 5 years ago, do you think it is easier today or harder today for a person to start out poor, work hard, and to get out of poverty?
1. Easier
 2. Harder
 3. No opinion
 4. The same
- Q14. Now, thinking only about *you and your family*, are you better off financially, about the same, or worse off than five years ago?
1. Better off
 2. Somewhat better off
 3. About the same
 4. Somewhat worse off (*Answer Q14a*)
 5. Definitely worse off (*Answer Q14a*)
- If answer 4 or 5,**
Q14a. Why do you think you are worse off? What has happened?
- Q15. Which of the following do you think is most correct?
(*ROTATE and read all before respondent chooses*)
1. Right now, there are **many jobs available, but the pay isn't high enough** to cover ordinary costs of living and household bills.
 2. Right now, there are **not many jobs available and it is hard to find work** at all.
 3. Right now, there are **many jobs available, and the pay is high enough** to cover the ordinary costs of living and household bills.
- Q16. *Economically*, and thinking about all of *Philadelphia*, would you say Philadelphia is, compared to 5 years ago,
1. Much better off economically
 2. Somewhat better off economically
 3. About the same
 4. Somewhat worse off economically
 5. Much worse off economically

Process Evaluation Survey Questions

- Q17. Thinking about *jobs in Philadelphia*, how satisfied are you that there are enough good jobs in Philadelphia right now so that people who want to work can find a decent living?
1. Very satisfied
 2. Moderately satisfied
 3. Neutral
 4. A little dissatisfied (**Answer Q17a**)
 5. Very dissatisfied (**Answer Q17a**)
- if answer 4 or 5,**
Q17a, Why are you dissatisfied? What can you tell me about your experience with the job market in Philadelphia?
- Q18. In terms of the amount of money we as a country are spending on assistance to people with low incomes do you think we are spending too much, too little, or about the right amount?
1. Too much
 2. Too little
 3. About the right amount

SECTION R: PARTICIPANT DEMOGRAPHICS

Finally, our last section deals with information that will allow us to group your responses with others to compare the results.

- R1. In What Year Were You Born: _____ OR: How old are you? _____
__ **check if refused**
- R2. Are you the head of household?
1. Yes
 2. No
- R3. How many people are in your household? _____
- R5. What are their **ages**?
- | | |
|-------|-------------------------------|
| _____ | Infants or Toddlers (under 5) |
| _____ | School age (5 to 18) |
| _____ | Adults (over 18) |
| _____ | Senior Citizens (over 65) |
- R6. How many in your household are blood relatives?
_____ **# out of total in R3**
- R7. What ethnicity or culture do you most closely identify with? (*open ended*)
1. White/caucasian
 2. Black/African-American
 3. Hispanic
 4. Asian
 5. Other
 9. Refused
 99. No answer

Process Evaluation Survey Questions

- R8. Respondent's Sex: Female _____ Male _____
- R9. What's the highest educational level you completed? (*Don't read. Circle response. Probe if needed for specificity*):
1. 8th grade or less
 2. Some high school, but not graduated
 3. Specialized technical, business, clerical, or other training, not high school graduate
 4. GED or High school graduate or high school equivalency (not the same as GED) (Probe which one: _____)
 5. Specialized vocational, technical, business, clerical, or other training after high school
 6. Some College (Probe: _____) How much?
 7. College graduate: (Probe: _____) AA, BA, BS or the equivalent
 8. Post Graduate (Probe: _____) some courses or PhD
 99. Refused

SECTION S: FINAL QUESTIONS

- S1. This is the end of our survey. Is there anything else you have thought of that you would like us to know about your experience with any of PECO's programs or services?
- S2. Is there anything else you would like to tell us that will help us to learn more about what agencies could do that would help you and your family?

Thank you very much for your help today. We would like to give you \$25 for your time and help with our survey today.

Verify name and address to send the check.

Name:

Address:

Please note any information that you said you would send to them:

Peach, H. Gil, Anne West, Howard Reichmuth, & Marcia Lehman. *PECO Energy's Customers with Incomes to 50% of the Federal Poverty Level in PECO Energy's Customer Assistance Program*. Beaverton, Oregon: H. Gil Peach & Associates, LLC, June 10, 2002, Monograph 0206-2.

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October 1, 2002

Via FedEx

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Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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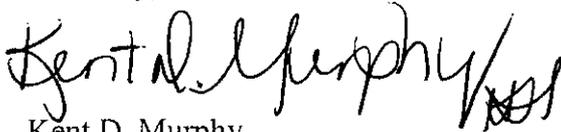
RE: PECO Energy Company, Docket No. M-00001418
R- 0002 7870

Dear Secretary McNulty:

Enclosed for filing with the Commission are an original and three (3) copies of a Petition for Expedited Approval of Consensus Modifications to PECO Energy Company's Universal Service Program and Associated Tariff Changes.

As proof of filing, please date stamp and return the extra copy of this cover letter in the enclosed return envelope.

Sincerely,



Kent D. Murphy
Assistant General Counsel

KDM/zr

Enclosures

cc: Certificate of Service

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46

Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval Of Its Restructuring Plan et al, Joint Petition for Settlement; Docket Nos. R-00973953 and P-00971265.

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Dated: October 1, 2002

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PECO Energy Company's Submission of :
Universal Service and Energy Conservation : DOCKET NO. M-00001418
Plan in Compliance with Section 54.74 : R- 00027870

PETITION FOR EXPEDITED APPROVAL OF
CONSENSUS MODIFICATIONS
TO PECO ENERGY COMPANY'S
UNIVERSAL SERVICE PROGRAM
AND ASSOCIATED TARIFF CHANGES

October 1, 2002

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company's Submission of :
Universal Service and Energy Conservation : **DOCKET NO. M-00001418**
Plan in Compliance with Section 54.74 :
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: **R- 0002 7870**
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**PETITION FOR EXPEDITED APPROVAL OF
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OCT 01 2002

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

In accordance with the Commission's September 29, 2000 Order in this proceeding and paragraphs 30-33 of the "Joint Petition for Settlement" in Docket No. A-110550F0147, PECO Energy Company ("PECO" or "the Company") hereby submits this Petition for Expedited Approval of Consensus Modifications to PECO Energy Company's Universal Service Program and Associated Tariff Changes ("PECO Universal Services Petition"). See, PECO's Submission of Universal Service and Energy Conservation Plan in Compliance with Section 54.74, Docket No. M-00001418 (Order entered September 29, 2002)("September 29 Order"); PECO Energy Company, Docket No. A-110550F0147, "Joint Petition For Settlement," dated March 24, 2000 ("Merger Settlement"). This petition addresses and resolves all issues identified by the Commission in the September 29 Order, fulfills certain of PECO's obligations from the Merger Settlement pertaining to a "special needs" plan, and resolves other specified issues identified

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with respect to the Company's Universal Services program.

The terms and conditions of the PECO Universal Services Petition represent a consensus proposal resulting from the collaborative efforts of PECO Energy and the PECO LIURP Advisory Committee to resolve issues involving the welfare of the low-income "special needs" residential population served under PECO's Electric Service Tariff. The LIURP Advisory Committee members that participated in developing this consensus proposal and support these modifications include the Pennsylvania Office of Consumer Advocate ("OCA"), the Consumer Education and Protective Association ("CEPA"), the Association of Community Organizations and Reform Now ("ACORN"), the Tenants Action Group ("TAG"), the Action Alliance of Senior Citizens ("Action Alliance"), the Pennsylvania Utility Law Project ("PULP"), the Utility Emergency Service Fund ("UESF"), and the Pennsylvania Department of Public Welfare ("PaDPW"). The Philadelphia Area Industrial Energy Users Group participated in the collaborative effort and does not oppose the modifications.

PECO avers that the provisions set forth in this petition are in the public interest and that the rates, terms and conditions of service for the proposed CAP Rate "Special Needs" program applicable to PECO's "special needs" low-income customers are just and reasonable, and otherwise in the public interest. Therefore, PECO requests that the Commission: (1) approve without modification the proposed PECO Universal Services Petition as set forth herein; and (2) approve the proposed tariff changes, appended hereto, that are necessary to implement the new CAP "Special Needs" program, rules and regulations. See Appendix A. Due to the substantial economic and service-related benefits that will be provided PECO's low-income community, PECO requests that the Commission approve the petition and accompanying tariff supplement on

an expedited basis, by no later than December 1, 2002.

In support of its request, PECO states as follows:

I. SUMMARY OF PETITION

The consensus terms and conditions set forth in this document constitute a means to resolve, fairly and equitably, the universal services issues arising from PECO's Universal Service and Consensus Plan, submitted April 14, 2000 and the Merger Settlement as well as some additional issues addressed herein. Approval of this Petition and implementation of the program modifications and associated tariff changes will create significant benefits for PECO's low-income customer population and avoid protracted litigation. These benefits come in the form of enhanced universal services resources being made available to special needs customers, identified as those customers at the lowest level of poverty with incomes between 0-50% of federal poverty level, through substantial rate discounts under the modified CAP program. The modified CAP program also includes a component to provide additional affordability assistance to those customers whose income is between 0-25% of the federal poverty level and have experienced an extenuating circumstance that affects their continued ability to pay. As such, each of the proposed modifications achieves the goals of the Commission's regulations and policies concerning universal service programs.

Specifically, in response to the September 29 Order, the consensus modifications provide substantial CAP Rate discounts that will benefit "special needs" customers with household incomes of less than 50 percent of federal government poverty level guidelines ("FPL"). As described in detail below at Section III.A, these tariff changes provide three additional tiered rate discounts under the Company's CAP schedule ("CAP Rider A, B, and C") that will now

supplement the two existing CAP Rate tiers I and II (“to be renamed as Cap D and Cap E, respectively”). Eligibility for each tiered rate discount will depend on the relative level of the customer’s household income, whether the customer takes service under Rate R or Rate RH, and whether the customer has “extenuating circumstances” that render it eligible for the steepest discounts. These tariff discounts, for specified usage, range as high as 85% below the otherwise applicable non-CAP Rate for customers with incomes between 0-25% of FPL and, for those customers with incomes between 0-25% of FPL and an identified extenuating circumstance, provide a total bundled fixed monthly charge that lies at the low end of the range identified in the Commission’s CAP Policy Statement, 69 Pa. Code § 69.265(3)

In addition to these rate discounts, the benefits to be provided pursuant to this Petition include:

- (1) Additional staffing resources to be devoted to PECO’s in-house CARES program,
- (2) Enhanced, targeted LIURP measures for customers that fall in the 0-50% of FPL income group;
- (3) Assurances concerning PECO’s Information Technology commitment to its Universal Service Program data warehouse;
- (4) The development of a written and detailed communication, education and outreach program plan that will be developed in cooperation with the PECO LIURP Advisory Board;
- (5) Continued support of local MEAF agencies efforts to obtain hardship contributions from ratepayers;
- (6) New rules concerning eligibility verification for PECO’s CAP program;

- (7) Changes to the medical certification procedures to address medically necessary electric usage and to reduce the burden of certification for those who are chronically or terminally ill; and
- (8) A commitment by PECO to hire an independent evaluator to measure and report on the impact that the program modifications set forth above have on the three groups for which CAP A, B, and C will be created.

Each of these program enhancements respond directly to concerns expressed by the Commission in the September 29 order, the Merger Settlement, or those expressed by members of the LIURP Advisory Committee.

In turn, PECO requests that the Commission find that PECO Energy has complied with the requirements of the September 29, 2000 order in all respects and mark this proceeding closed.

II. BACKGROUND

This matter has its genesis in PECO's April 14, 2000 filing in compliance with the Commission's *Reporting Requirements for Universal Service and Energy Conservation Programs* at 52 Pa. Code S 54.4 and the Merger Settlement. After several exchanges of information requests from the Commission's Bureau of Consumer Services ("BCS") and PECO, the Commission issued the September 29 Order. That order found the Company's Universal Service and Energy Conservation Programs, in large part, to be in compliance with pertinent provisions of the *Electricity Generation Customer Choice and Competition Act* ("Electric Restructuring Act"), 66 Pa.C.S. SS 2801-2812. See, PECO's Submission of Universal Service

and Energy Conservation Plan in compliance with Section 54.74, Docket No. M-00001418

(Order entered September 29, 2002)(“September 29 Order”).

Specifically, in the September 29 Order, the Commission made the following findings relative to PECO’s universal service and conservation plans:

The Commission finds that PECO’s universal service plan complies with sections 2803 and 2804(9) of the Act, the reporting requirements at 52 Pa. Code S 54.74, and the Commission’s Final Order approving PECO’s restructuring settlement agreement at Docket No. R-00973953. We also find that PECO’s plan may not adequately comply with Section 2802(10) of the Act and the CAP Policy Statement at 52 Pa.Code § 69.265(2);

September 29 Order at 28.

The Commission ordered PECO to undertake specific steps towards analyzing and possibly enhancing the CAP Rate discounts for certain “special needs” or “safety net” customers:

1. PECO is directed to analyze the cost of extending the CAP rate discount to the entire bill of CAP Rate R base load customers served from January 1, 1998 to December 31, 1998 whose incomes are below 50% of the poverty guidelines and whose usage exceeds 500 kWh per month. This analysis should compare the costs of expanding the discount to the costs of pursuing current collection efforts for this group of customers. This analysis is to be submitted to the Commission’s BCS by November 30, 2000 to ascertain whether a discount applied to the entire bill for this group of customers may significantly decrease the number of customers who might need a “safety net” or “special needs” component to the CAP Rate.

Id.

In addition, in the September 29 Order, the Commission directed PECO to 1) schedule a meeting within 90 days of the date of this order to discuss the status of the CAP Rate R analysis with the Bureau of Consumer Services; 2) to explain the benefits of and to offer budget billing to

its CAP Customers and 3) to provide BCS with a copy of the text to be used regarding their explanation of these offerings and budget billing. Finally, the Commission encouraged the Company to make the determination regarding a “safety net” or “special needs” component to the CAP Rate, if possible, prior to the June 30, 2002 deadline outlined in the Merger Settlement. Merger Settlement, para. 31.

The Merger Settlement also launched a cooperative analysis by the Company and the LIURP Advisory Subcommittee into other aspects of the Company’s Universal Service Program. These terms and conditions include the following:

- **Data Warehouse.** PECO agreed to institute and maintain a customer data warehouse that will include appropriate Universal Service data. Merger Settlement, para. 29.
- **Special Needs CAP Program Evaluation.** The Company agreed to determine the need for a “special needs” program and components of such a program after sufficient Universal Service data was compiled and that, after such information is compiled, evaluate, with the LIURP Advisory Committee, whether a “special needs” component should be added to the Company’s CAP Rate programs. Such a “special needs” program should include, but was not limited to, program changes that address the special needs of customers with incomes at or below 50 percent of the federal poverty guidelines. June 30, 2002 was identified as the target date for determining the necessity for and formulation for such a program. If the parties were unable to achieve a consensus on a program by that date, PECO was obligated, within 60 days thereafter, to make a recommendation to the Commission concerning a “special needs” component. Merger Settlement, para. 31.

- **Independent Evaluation.** The Company agreed to permit H. Gil Peach, PhD to perform an independent evaluation of whether a special needs component of the Company CAP Rate would be necessary. Such independent evaluation was scheduled for completion by January 31, 2002. Merger Settlement, para. 32. PECO also agreed to provide Dr. Peach access to information stored in the data warehouse. Merger Settlement, para. 30.
- **CAP Participation Levels.** The initial maximum participation level of 100,000 customers in the Electric CAP program specified in Paragraph 34 of the 1998 Electric Restructuring Settlement was increased to a provisional maximum participation level of 125,000 customers subject to revision and adjustment in consultation with the LIURP Advisory Committee when that level is reached. Merger Settlement, para. 34.
- **Universal Service Fund Cost Recovery.** In the event that Electric CAP Rate enrollment reached 90,000 customers, the cost credit recoverable in the Universal Service Fund Cost ("USFC") Section 1307 recovery mechanisms for each CAP Rate customer in excess of 90,000 customers will be \$383 per year in order to recover revenue shortfalls from the CAP Rate discounts. Merger Settlement, para. 35.

In compliance with the September 29 Order and the Merger Settlement, PECO and the PECO LIURP Advisory convened a number of meetings to discuss the various low-income issues set forth for discussion in the Merger Settlement and the September 29 Order. At these meetings, the status of the analysis and recommendations of H. Gil Peach & Associates were discussed along with analysis developed by the Company. On June 10, 2002, Dr. Peach submitted his analysis and recommendations for the Company and LIURP Advisory Committee

to consider. As a result of these meetings and thoughtful consideration of the evaluation by Dr. Peach, the various participants in the collaborative process reached a consensus agreement concerning the modifications needed to be made to PECO's Universal Services Program. This petition documents the terms and conditions of that consensus.

III. TERMS AND CONDITIONS

The terms and conditions of the PECO Universal Services Petition are as follows:

A. CAP Rate Modifications

PECO Energy's existing CAP Rate Program is comprised of CAP Rate I and CAP Rate II. CAP Rate I eligibility is open to customers with annual household gross income at or below 100 percent of the Federal poverty income guidelines and provides a nominal 51.9 percent discount on the pricing of the first 500 kWh of usage. CAP Rate II eligibility is open to customers with annual household gross income from 101 percent up to and including 150 percent of the Federal poverty income guidelines and provides a nominal 26 percent discount on the pricing of the first 500 kWh of usage. Among other criteria, CAP Rate I and II customers also must comply with other terms and conditions applicable to energy assistance grants and energy education and conservation programs facilitated by PECO Energy.

The Consensus modifications proposed herein expand the breadth of PECO's CAP Rate services to customers with incomes between 0-50% of FPL with three additional CAP Rate offerings. See Appendix A, pro forma tariff pages. These offerings shall be identified in the PECO Electric Service Tariff as CAP A, B, and C, with the two existing CAP Rate programs, CAP Rate I and II, being renamed as CAP D and E, respectively. CAP A, B and C shall be an

open enrollment program for all eligible customers with a provisional maximum participation level of 40,000 customers. That 40,000-customer enrollment target may be increased by PECO after consultation with the LIURP Advisory Committee when that level is reached.¹ Renamed CAP D and E shall be subject to the same terms and conditions that apply to the existing CAP Rates I and II, respectively.

1) **CAP A.** CAP A will be established for customers with annual household gross income that is equal to or less than 25 percent of FPL and have an identified extenuating circumstance. CAP Rate A is structured as follows:

- CAP A customers that take service under Rate R will be required to pay a total monthly bill of \$12 for all usage up to 1000 kWh. Usage in excess of 1000 kWh per month would be billed the CAP D rate (now CAP Rate I) rate.
- CAP A customers that take service under Rate RH will be required to pay a total monthly bill of \$30 for all usage up to 2000 kWh billed in the winter months of October through May in addition to the month of June and 1000 kWh in the summer months of July, August and September. Usage in excess of those usage thresholds kWh per month will be billed at the CAP D rate.
- “Extenuating Circumstances” customers shall be limited to CAP Rate customers who otherwise demonstrate an inability to pay their bills as a result of unique circumstances such as those related to health (injury, illness, disability, high medical bills, medically related electric usage, death in the family), sudden loss of employment, the presence of high risk household members (children below 8 years of age, disabled individuals, or infirm elderly), an inability to comply with at least 2 non CAP A payment arrangements, or high non-discretionary electric usage related to shelter conditions not susceptible to mitigation through LIURP measures.
- CAP A enrollment will be limited to no more than 7,500 “extenuating

¹ For clarity purposes, the Company notes that the total number of customers enrolled in CAP Rates A, B, C, D and E. will count towards the 90,000 CAP Rate customer threshold identified in Paragraph 35 to the Merger Settlement, for the purpose of the Company’s recovery of the per customer CAP Rate discount revenue shortfall of \$383. Moreover, while the per customer revenue shortfall may increase as a result of the steeper discounts provided for CAP Rates A, B and C, the Company has agreed not to seek recovery of the incremental rate through the Paragraph 35 USFC rate mechanism.

circumstances” customers.

- Additionally, CAP A customers and PECO CARES representatives shall work in a cooperative effort to maximize the amount of government or private financial assistance available to the customer.
- CAP A customers subject to Rate R will also receive assistance from PECO Energy to restore service by other vendors of heating energy so as to reduce usage of electric space heating.
- CAP A customers will not be eligible to shop for generation service provided by a competitive electric generation supplier.
- Finally, CAP A customers will be required to re-certify their eligibility for service under CAP Rate A on an annual basis. In this respect, PECO Energy will evaluate whether a customer’s receipt of a LIHEAP grant would constitute adequate proof of income.

2) **CAP B.** CAP B will be established for customers with annual household gross income that is equal to or less than 25 percent of Federal poverty income guidelines. For service billed in the summer months of July, August and September, eligible customers will be provided a nominal 85 percent rate discount on the first 500 kWh, and a nominal 30 percent discount on the next 100 kWh, of their Rate R or Rate RH service; during the months of October through June, the same customers will receive a nominal 85 percent discount on the first 500 kWh of their bill. All other usage will be assessed the otherwise applicable tariff rate R and RH charges. CAP B customers will not be eligible to shop for generation service provided by a competitive electric generation supplier.

3) **CAP C.** CAP C will be established for customers with annual household gross income that is greater than 25 percent up to and including 50 percent of Federal poverty income guidelines. For service billed in the summer months of July, August and September, eligible customers will be provided a nominal 75 percent rate discount on the first 500 kWh, and a

nominal 30 percent discount on the next 100 kWh, of their Rate R or Rate RH service; for the months of October through June, the same customers will receive a nominal 75 percent discount on the first 500 kWh of their bill. All other usage will be assessed the otherwise applicable tariff rate R and RH charges. CAP C customers will not be eligible to shop for generation service provided by a competitive electric generation supplier.

4) Miscellaneous CAP Program Changes. In addition to the three additional CAP Rate tiers, PECO has agreed to make other changes to the CAP Rate program rules regarding medical certification and income verification. As noted above, CAP A customers will be required to re-verify their eligibility for that rate annually. If the customer's circumstances have changed so that they are able to move off of the CAP A program, PECO will place the customer in the most advantageous CAP Rate tier or on the appropriate rate. As for the other CAP Rates (B, C, D, and E), PECO will develop procedures designed to require all CAP customers to re-verify their eligibility every two years. Again, at re-verification, PECO will insure that the customer is in the most advantageous CAP Rate tier or on the most appropriate rate.

As far as the medical certification requirement for CAP Rate customers is concerned, PECO will replace the monthly medical certification requirement for the chronic or terminally ill with a requirement that the customers re-certify every six months; and will enact a health usage and medical certification policy that a) requires that all medically necessary usage will be charged the individual's discounted CAP Rate even where such usage may exceed the kWh discount threshold otherwise stated in the rate and b) provides information, education, and outreach resources which explain the medical certification and CAP rate medical usage policies and procedures to health care providers such as home health care aides, visiting nurses,

physicians, clinics, hospitals, hospital social workers and respite care centers.

The Company's arrearage forgiveness component to the CAP Rate will continue.

Customers who qualify and are placed on the CAP Rider will have their pre-program arrearage forgiven if they remain current on their CAP bill for six consecutive months. The development of any new arrearage during this period will delay forgiveness. Customers that develop any new arrearage will be offered a payment agreement.

B. Targeted LIURP Measures

PECO has agreed to place customers with annual household gross income that is less than or equal to 50 percent of Federal poverty income guidelines and whose average monthly electric usage exceeds 1,000 kWh per month in the highest priority population eligible for LIURP measures. LIURP treatments, including air conditioner and refrigerator replacements, where within LIURP economic guidelines, will be utilized for this population, along with other LIURP treatments as a means to reduce electric usage of this customer population. Such expenditures will be treated as expenditures from the Company's annual LIURP budget.

C. PECO CARES

PECO has agreed to commit additional resources to the CARES component of its Universal Services program. Specifically, PECO has agreed to 1) establish an in-house CARES program of at least 3 CARES case managers; and 2) develop and implement a detailed work plan stating the goals, activities, minimum qualifications and responsibilities of its CARES staff.

Such detailed work plan shall be finalized no later than May 30, 2003.

D. Low-income Customer Outreach

PECO has agreed to develop a written and detailed communication, education, and outreach program for its low-income customer population. This program will address, at a minimum, the following factors: 1) how to read and understand bills and written notices; 2) an explanation of budget billing; 3) education materials and other information concerning energy conservation; 4) materials explaining CAP Rate program eligibility, terms and conditions, including the arrearage forgiveness component; 5) materials explaining the Company's Universal Services program and how to contact and work with PECO's Universal Services staff; 6) materials explaining the Company's CARES program. Development of program plan and materials will be performed in cooperation with the PECO LIURP Advisory Board.

E. Commitment to MEAF Agencies.

As part of the consensus modifications to its Universal Services program, PECO has agreed to specific measures designed to support local MEAF agencies that are designed to improve hardship contributions by ratepayers. These measures shall include the following: 1) PECO will include in its Energy News bill insert four times per year the opportunity for a customer to sign and return a pledge form to make a MEAF contribution; and 2) Donor Lists -- PECO will collect and maintain donor list information. PECO also agrees to meet with the MEAF agencies to develop measures to improve contributions to the hardship funds, which may include a Public Service Announcement.

In accordance with Paragraph 29 of the Merger Settlement, since the "special needs" CAP

Rate program provided in III.A above will not be in place by January 1, 2003, PECO Energy will make a \$400,000 contribution to the county fuel fund agencies on or before January 15, 2003.

This payment will be allocated in accordance with PECO's existing allocation formula for PECO's MEAF funds to each county.

F. IT Resources

To address concerns expressed concerning the quality and accessibility of customer data relevant to PECO's low-income customers, PECO has agreed to certain measures designed to enhance the information technology (IT) resources available to the Universal Service program. These enhancements include: 1) assurances that IT staff will be available to fulfill the priority information requirements of the Universal Service program; 2) completion of a data warehouse that is capable of providing customer information needed by PECO's Universal Service staff to manage and monitor the program, including materials needed to comply with Commission filing requirements; and 3) status reports on the functionality of the data warehouse to the PECO LIURP Advisory Committee that provides updated information on the type of information that will be incorporated into the data warehouse, the staff members that have access to the information in the data warehouse, and a history of how requests for IT assistance are processed and satisfied.

G. Program Evaluation

PECO has agreed that an independent evaluator will measure and report on the Universal Service Program modifications provided under sub-paragraphs III.A through III.F. This independent evaluation shall be performed in conjunction with the program evaluation required

under the Commission's Universal Service Regulations. For the purpose of PECO's program, the first such evaluation shall begin no later than October 31, 2005 and be completed no later than May 1, 2006.

H. Universal Services Flow Chart.

Attached hereto as Appendix B is a flow chart showing the various components of its Universal Service Program, functional responsibilities of key PECO personnel responsible for components of the PECO Universal Service program, and the corporate officers who are responsible for implementation and oversight of the Company's Universal Services programs.

I. LIURP Advisory Committee Updates

PECO Energy has also agreed that it will provide written monthly progress reports to the PECO LIURP Advisory Committee during the implementation of the consensus modifications as well as convene quarterly status meeting with the LIURP Advisory Committee. The purpose of these reports and meetings will be to provide the LIURP Advisory Committee a status update on the implementation of the Universal Service program modifications, to develop and review educational and outreach materials, and to discuss other issues that may arise from time to time relative to the Universal Service program of the Company.

J. Implementation Deadline

As an integral part of its agreement with the LIURP Advisory Committee membership, PECO Energy has agreed to take all reasonable steps necessary to ensure that its Universal

Service program modifications, as described above, fully function no later than the end of the 9th calendar month following a final Commission order approving the Petition.

K. Waiver of 52 Pa. Code § 54.74 Filing Requirement.

52 Pa. Code § 54.74 requires the Company to make a filing every three years in which it describes its universal services and energy conservation plan. Under these regulations, PECO's next plan submission in compliance with Section 54.74 of the Commission's regulations is due no later than February 28, 2003. Such update is required to provide the Commission with the status of the Company's Universal Service Plan including but not limited to program changes that have been implemented. However, other than the program changes proposed in this Petition, PECO's Universal Services and Energy Conservation program remains unchanged from that approved by the Commission in the September 29 Order. Accordingly, PECO requests waiver of 52 Pa. Code S 54.74 filing requirement to the extent that such regulation would require PECO to make a Universal Service Plan filing in compliance that includes the modifications in this Petition prior to February 28, 2006. Waiver of such requirement would allow PECO to focus its energy on implementing the program changes called for in this Petition so that affected customers can derive the benefits of the program changes as soon as possible.

IV. THE PROPOSED CONSENSUS MODIFICATIONS SHOULD BE APPROVED.

A. Introduction

The consensus Universal Services program modifications proposed herein should be approved. The proposed CAP Rate program tariff changes are just and reasonable, and consistent with applicable universal service policies, in that the three additional tiered rate discounts provide additional assistance for a substantial number of PECO's "special needs" low-income customers with annual household incomes that are less than 50 percent of federal poverty income guidelines to enable them to better afford service. This expansion of PECO's program to address these special needs will be subject to the existing rate and other parameters established under the PECO Electric Restructuring and Merger Settlements.

Additionally, the tariff changes and the other Universal program changes to which the Company has agreed, such as the targeted LIURP measures, will assist these special needs customers in addressing the energy efficiency of their homes so that these customers can better manage their energy usage. Other changes will further outreach to customers and better educate customers as to all aspects of the program. The changes to the medical certification procedures will also ensure that medically necessary energy usage is billed at a discounted rate, and it will *relieve certification burdens for those who are chronically or terminally ill*. Finally, the improvements and commitments to information technology, as well as the schedule for further evaluations should allow the Company and other interested parties such as the LIURP Advisory Committee to evaluate the Company's Universal Service program on an ongoing basis.

When reviewed as a comprehensive plan, these modifications significantly advance

PECO's programs designed to meet the Commission's universal service and energy conservation plan requirements. This significant advancement shall be subject to the rate parameters of the PECO Electric Restructuring and Merger Settlement. Finally, as with consensus agreements generally, acceptance of the proposed changes without modification would be consistent with the Commission's policy favoring consensus solutions. While not technically a settlement, the results of the collaborative effort reflect an end result that is reasonable and are the product of parties with specialized expertise in resolving low-income "special needs" customer issues in the PECO Energy electric service territory.

For these reasons, and the reasons set forth in more detail below, approval of these program modifications would be just and reasonable and otherwise in the public interest.

B. The Consensus Modifications Comport With the Commission's CAP Rate Policies and Applicable Regulations and Are Otherwise Just and Reasonable.

In the September 29 Order, the Commission expressed concern that the Company's CAP Rate program "may not may not adequately comply with Section 2802(10) of the Act for a (sic) approximately twenty percent of CAP Rate Customers who have low-incomes and high usage." September 29 Order at 14-15. The proposed CAP A, B, and C tiers address these concerns expressed in the September 29 Order with respect to Section 2802(10) and the Commission's CAP regulations. CAP B, and C provide discounts of 75% and 85% rather than the existing discount of 51.9%. Thus, as the customer's income declines, the customer is eligible for additional rate discounts on the first 500 kWh of usage. Additionally, to address usage over 500 kWh during the summer months, a 30% discount is provided on an additional 100 kWh of usage. For customers at the very lowest level of poverty (incomes between 0-25% of FPL) who

have an “extenuating circumstance” a fixed payment is set at the minimum end of the range established in the CAP Policy statement, \$12 per month for non-heating electric customers and \$30 per month for an electric heating customers. See 52 Pa.Code § 69.265(B) and (C).

The proposed plan will also seek to address customers with high usage through targeted LIURP measures. When effective, these measures will include air conditioner and refrigerator replacement, two appliances that are known to be a significant source of energy usage. Through other LIURP measures targeted to these customers, the customers should be able to gain some control over their electric usage and improve their living condition.

Other universal service program changes that are presented should provide PECO low-income customer population with a balanced universal service program. The addition of three PECO’s CARES case managers should enhance the ability of payment-troubled customers to obtain timely assistance in resolving their utility related issues as well as their financial and social circumstances. See II.C., supra. The additional CARES case managers should assist the Company in dealing with its low-income customers in a proactive manner. Modifications to the medical certification procedures should ensure that chronically or terminally ill customers are not unduly burdened, and will ensure that medically necessary electric usage is billed at a discounted rate.

The benefits of the enhanced low-income customer outreach and commitment to MEAF agencies should improve communication with the low-income customer population and should improve the customer’s understanding of the program, its terms and conditions. The commitment to work further with the MEAF agencies could potentially increase energy hardship contributions from customers, thus making even more assistance available to low-income

customers. See, II.D and II.E., supra. The consensus modifications also provide for timely program evaluation, and other reporting requirements that should allow the Commission and the LIURP Advisory Committee to evaluate and monitor PECO's universal service program.

PECO submits, for additional reasons, that the Commission should deem the CAP Rates proposed herein, along with the other universal service modification, to be just and reasonable and in the public interest. The discounted rate aspect of the program should allow the Company to more effectively manage the overall cost of its universal service programs, in part due to the fact that the resources currently put into negotiating and administering payment arrangements with payment troubled customers or dealing with complaints before the Commission should now be focused, as provided by other features of the consensus modifications, on other, more productive efforts through the CARES and other Universal Services programs such as assisting customers to obtain energy assistance payments under LIHEAP and MEAF, and gaining control over their electric usage with LIURP measures. These attributes could potentially mitigate the ratemaking burden of uncollectible accounts expense and the cost of dealing with payment-troubled customers that are borne by PECO's customers.

Finally, PECO has committed to improve the quality of its universal service data warehouse. Placing a higher priority on the IT resources dedicated to this project should improve the features of the existing data warehouse and allow the universal services staff to evaluate performance of their program on a better informed basis. This enhancement will also improve the reliability of information provided to the Commission, independent evaluators and LIURP Advisory members with an interest in the performance of PECO's universal service program

Accordingly, along with the other modifications proposed for the CAP Rate program concerning income verification and medical certification policy, the Company's CAP Rate program is consistent with the Commission's regulations and should address the concerns expressed by the Commission with respect to the affordability of the CAP Rate program for all CAP eligible customers, including those with the lowest incomes.

C. The Consensus Modifications are Consistent With Commission Policies Promoting Negotiated Solutions.

PECO and the LIURP Advisory Committee arrived at the consensus modifications after conducting extensive analysis, through the efforts of Dr. Peach, the Company and other Committee members, and after engaging in in-depth technical discussions over many months. As a result, the consensus terms and conditions that developed through those efforts constitute a carefully crafted package representing reasonable negotiated compromises on the issues addressed herein. Thus, the PECO Universal Service Petition is consistent with the Commission's rules and practices encouraging negotiated settlements (see 52 Pa. Code §§ 5.231, 69.391, 69.401). While not the result of settlement discussions in a litigated proceeding, advocates from each of the interested parties cooperated to produce these consensus modifications.

D. Expedited Approval is Needed So That the Benefits of The Consensus Modification May Be Provided As Soon As Possible.

PECO Energy requests that the Commission expedite its approval of the consensus modifications so that the Company may implement the necessary changes as soon as possible. In this respect, all of the tariff changes will be implemented no later than the end of the ninth month

after the Commission enters an order approving the modifications. This lag is necessary to ensure that the necessary information system changes, education literature and other program changes needed to support the CAP Rates A, B and C are developed and implemented.

V. CONCLUSION

WHEREFORE, the PECO Energy Company respectfully requests that the Commission: (1) approve this Petition, including all terms and conditions contained herein, without modification; and (2) approve the Tariff Supplements attached as Appendix A to become effective pursuant to terms set forth therein; and (3) determine that the Company's Universal Service Program, as modified by the terms and conditions of this Petition and accompanying tariff supplement comply with all legal requirements, including the requirement that PECO's tariff rates, terms and conditions must be just and reasonable.

Respectfully submitted,



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Counsel for: PECO Energy Company

DATED: October 1, 2002

**Information furnished with the filing of rate changes under
52 Pa. Code, Section 53.52(a).**

(a)(1) The specific reason for each change.

Changes to the Company's CAP Rate Program are a direct result of commitments made by the Company in Settlement of its merger proceeding (A-00110550 F-0147), in which the Company agreed to review, and if warranted, implement a "special needs" program for customers with incomes at or below 50% of the federal poverty level. The program was to be based on an evaluation of the CAP Rate program by Dr. Gil Peach and a collaborative process involving the LIURP Advisory Group (Universal Services paragraphs of the Merger Agreement 29-37). The Company's Petition (M-00001418) sets forth the details of such a "safety net" program as a result of the collaborative process.

(a)(2) The total number of customers served by the utility.

The total number of electric customers as of September 1, 2002 was 1,526,113.

(a)(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

The total number of CAP rate customers at or below 50% of the federal poverty level is approximately 33,000.

(a)(4) The effect of the change on the utility's customers.

Please refer to pages 8-38 of the filed petition.

(a)(5) The effect, whether direct or indirect, of the proposed change on the utility's revenue and expenses.

The Company estimates an annual net revenue reduction of between \$5 and \$6 million. Increased administrative costs are estimated to be \$0.4 million annually, with start-up costs estimated to be \$0.9 Million. The Company has not estimated any savings that may result from potentially fewer service terminations.

(a)(6) The effect of the change on the service rendered by the utility.

Please refer to pages 8-38 of the filed petition.

(a)(7) A list of factors considered by the utility.

In arriving at the consensus modifications to the CAP Rate program the Company evaluated rate discounting methodologies, Percentage of Income Plan (PIP) methodologies, and combination methodologies considering the following:

1. Customer affordability criteria
2. Administrative cost to implement and maintain the program
3. Net revenue reduction associated with the program
4. Effect on other customers if additional cost recovery was to be requested (none requested in this filing)

(a)(8) Studies undertaken by the utility in order to draft its proposed change.

In addition to the data available from the Dr. Peach study, the Company prepared a study to determine the appropriate level of monthly kWh usage for which the rate discount should apply. Specifically, the Company calculated average residential customer usage for the Philadelphia region for the last three-year period (1999-2001). The results indicated average usage to be 466 kWh per month. In view of the nature of the program and the desire to send a price signal to strongly encourage conservation for this group of customers, the Company believes 500 kWh to be the appropriate level of kWh/month for which the CAP rate discount should apply (CAP Rates "B" & "C"). The Company has agreed to lesser discounts for an additional 100 kWh/month in the summer months of July, August and September as an accommodation to improve air conditioning usage affordability. In the PECO Cares Program (CAP Rate "A") the Company will provide service for a fixed monthly price provided usage is below 1,000 kWh for Rate R and 2,000 kWh (1,000 kWh summer) for Rate RH (heating) customers.

(a)(9) Customer polls taken and other documents, which indicate customer acceptance and desire for the proposed change.

No specific polls were conducted; however consensus was reached the LIURP Advisory Group.

(a)(10) Plans the utility has for introducing or implementing the changes with respect to its customers.

Please refer to the filed petition, page 14.

(a)(11) F.C.C., or FERC or Commission orders or rulings applicable to the filings.

PaPUC approval of the Company's merger proceeding at Docket No. A-00110550 F-147.

Customer Assistance Program (CAP) Rider

AVAILABILITY:

To payment-troubled customers who are currently served under or otherwise qualify for Rate R or Rate RH (does not include multiple dwelling unit buildings consisting of two to five dwelling units). Customers must apply for the rates contained in this rider and must demonstrate annual household gross income at or below 150% of the Federal Poverty guidelines. Based on the applicable level of income and other criteria, the following CAP Rate categories (A through E) apply:

CAP A - PECO Cares Program : Customers with annual household gross incomes at or below 25% of the Federal poverty income guidelines with documented extenuating circumstances will be eligible for CAP A which provides for Residential Rate R customers a nominal bundled rate of \$12/month for all usage up to 1,000 KWH; for usage above 1,000 KWH the CAP D rate structure will apply. For Residential Heating customers Rate RH, CAP A provides a nominal bundled rate of \$30/month for all usage up to 2,000 KWH in the Winter/1,000 KWH in the Summer; for usage above 2,000/1,000 KWH the CAP D rate structure will apply.

Extenuating circumstances shall include those individuals who demonstrate an inability to pay the billed rate of CAP B as a result of unique circumstances such as:

- Health related matters:
 - Injury or illness
 - High medical bills
 - Medically related usage
 - Death in the family
- Sudden loss of employment
- Households that include at risk individuals such as:
 - Children below 8 years of age
 - Disabled persons
 - Infirm elderly
- Inability to maintain at least two CAP B payment arrangements
- High usage related to shelter conditions which are not treatable by LIURP

MONTHLY RATE – CAP A:

	RATE R		RATE RH	
Fixed Distribution Service Charge		\$5.10		\$5.10
Variable Distribution Service Charge	1 st 1000 KWH	\$2.41	1 st 2,000 KWH Winter	\$8.25
	Additional KWH	CAP D ¹	1 st 1,000 KWH Summer	\$8.25
			Additional KWH	CAP D ¹
Competitive Transition Charge	1 st 1000 KWH	\$1.47	1 st 2,000 KWH Winter	\$5.31
	Additional KWH	CAP D ¹	1 st 1,000 KWH Summer	\$5.31
			Additional KWH	CAP D ¹
Energy and Capacity Charge	1 st 1000 KWH	\$2.74	1 st 2,000 KWH Winter	\$10.34
	Additional KWH	CAP D ¹	1 st 1,000 KWH Summer	\$10.34
			Additional KWH	CAP D ¹

¹ Rate R - for the usage exceeding 1000 kWh, the rate structure equates to the unbundled CAP D Rate, which will provide a nominal 50% discount on the energy pricing for the next 500 kWh used. Rate RH - for the usage exceeding 2000 kWh winter/1000 kWh summer the rate structure equates to the unbundled CAP D Rate, which will provide a nominal 50% discount on the energy pricing for the next 500 kWh used.

Program Provisions: The CAP A Rate is limited to 7,500 customers and these customers will be re-certified annually. CAP A customers will be targeted to receive LIURP treatments; and they will be assigned to a PECO Cares Representative to maximize the assistance available to them. In addition, these customers will not be able to obtain Competitive Energy Supply.

Customer Assistance Program (CAP) Rider – (Continued)

CAP B: Customers with annual household gross incomes at or below 25% of the Federal poverty income guidelines and who are not eligible for CAP A will be eligible for the CAP B Rate which provides a nominal 85% discount on the pricing of the first 500 kWh of usage, and a nominal 30% discount on the next 100 kWh billed in the months of July, August and September.

CAP C: Customers with annual household gross incomes at or greater than 26% but less than 51% of the Federal poverty income guidelines will be eligible for the CAP C Rate which provides a nominal 75% discount on the pricing of the first 500 kWh of usage and a nominal 30% discount on the next 100 kWh billed in the months of July, August and September.

CAP D: Customers with annual household gross incomes at or greater than 51% but less than 101% of the Federal poverty income guidelines will be eligible for the CAP D Rate which provides a nominal 50% discount on the pricing of the first 500 kWh of usage.

CAP E: Customers with annual household gross incomes from 101% up to and including 150% of the Federal poverty income guidelines will be eligible for the Customer Assistance Program CAP E Rate which provides a nominal 26% discount on the pricing of the first 500 kWh of usage.

MONTHLY RATE TABLES (CAP B – E Rates):

RATE R

	CAP B	CAP C	CAP D	CAP E
Fixed Distribution Service Charge	\$5.10	\$5.10	\$5.10	\$5.10
	¢/kWh	¢/kWh	¢/kWh	¢/kWh
Variable Distribution Service Charge				
first 500 kWh	.63	1.05	2.03	3.11
next 100 kWh (July - Sept Only)	2.93	2.93	---	---
additional kWh	4.19	4.19	4.19	4.19
Competitive Transition Charge				
first 500 kWh	.41	.69	1.33	2.04
next 100 kWh (July - Sept Only)	1.93	1.93	---	---
additional kWh	2.75	2.75	2.75	2.75
Energy and Capacity Charge *				
first 500 kWh	.79	1.32	2.54	3.91
next 100 kWh (July - Sept Only)	3.69	3.69	---	---
additional kWh	5.27	5.27	5.27	5.27

RATE RH

	CAP B Summer	CAP B Winter	CAP C Summer	CAP C Winter	CAP D Summer	CAP D Winter	CAP E Summer	CAP E Winter
Fixed Distribution Service Charge	\$5.10	\$5.10	\$5.10	\$5.10	\$5.10	\$5.10	\$5.10	\$5.10
	¢/kWh							
Variable Distribution Service Charge								
first 500 kWh	.60	.60	1.01	1.01	1.94	1.94	2.97	2.97
next 100 kWh (July - Sept Only)	2.81	---	2.81	---	---	---	---	---
additional kWh	4.02	1.94	4.02	1.94	4.02	1.94	4.02	1.94
Competitive Transition Charge								
first 500 kWh	.41	.41	.69	.69	1.33	1.33	2.04	2.81
next 100 kWh (July - Sept Only)	1.93	---	1.93	---	---	---	---	---
additional kWh	2.75	1.33	2.75	1.33	2.75	1.33	2.75	1.33
Energy and Capacity Charge *								
first 500 kWh	.82	.82	1.37	1.37	2.65	2.65	4.07	4.12
next 100 kWh (July - Sept Only)	3.84	---	3.84	---	---	---	---	---
additional kWh	5.49	2.65	5.49	2.65	5.49	2.65	5.49	2.65

* CAP (A - C) Rate customers will not be able to obtain Competitive Energy Supply.

ENERGY AND CAPACITY CHARGE: The preceding Energy and Capacity Charges are not applicable to the customer if the customer is eligible for and obtains Competitive Energy Supply, and therefore will only apply if the customer receives Default PLR Service.

If the customer obtains Competitive Energy Supply, the customer will receive a credit, on the first 500 kWh of usage on their PECO Energy bill, as follows:

Customer Assistance Program (CAP) Rider - Continued

CUSTOMER CREDIT WHEN OBTAINING COMPETITIVE ENERGY SUPPLY (applicable to CAP D & E only):

RATE R		RATE RH			
CAP D	CAP E	CAP D		CAP E	
		Summer	Winter	Summer	Winter
2.73¢/kWh	1.36 ¢/kWh	2.84 ¢/kWh	2.84 ¢/kWh	1.42 ¢/kWh	1.37 ¢/kWh

METERING AND BILLING CREDITS: A customer receiving Advanced Meter Services from a AMSP other than the Company will receive a credit on the Fixed Distribution Service Charge equal to the Total Metering Credit set forth for Rate R or RH as applicable in Appendix B to the Joint Petition for Full Settlement. A customer receiving Consolidated EGS Billing will receive a credit on the Fixed Distribution Service Charge equal to the Billing and Collection Credit set forth for Rate R or RH as applicable in Appendix B to the Joint Petition for Full Settlement.

CERTIFICATION: Certification by various State agencies that a customer is receiving certain government assistance payments may be used where possible to expedite the eligibility process. These payments include (but are not limited to) AFDC, SSI, Food Stamps, PACE and Medicaid. Information available from the Pa. Department of Revenue may also be used where appropriate to expedite the process. In addition, PECO may also utilize the LIHEAP cash grant amount to help determine income level.

A process will be established to provide verification of eligibility for customers who do not fit the above processes. Asset testing will also be used where necessary and appropriate. Customers being considered for the CAP Rider will be required to:

- Waive certain privacy rights to enable PECO Energy to effectively conduct the above certification process.
- Apply for and assign to PECO Energy at least one energy assistance grant from the Commonwealth.
- Participate in various energy education and conservation programs facilitated by PECO Energy.

MINIMUM CHARGE: The minimum charge per month will be the Fixed Distribution Service Charge.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT PLR SERVICE. Unless such a customer is able to obtain transmission service on its own, PECO Energy will provide transmission service, and will impose charges on such a customer for such transmission service.

STATE TAX ADJUSTMENT CLAUSE, NUCLEAR DECOMMISSIONING COST ADJUSTMENT, UNIVERSAL SERVICE FUND CHARGE APPLY TO THIS RATE.

ARREARAGE:

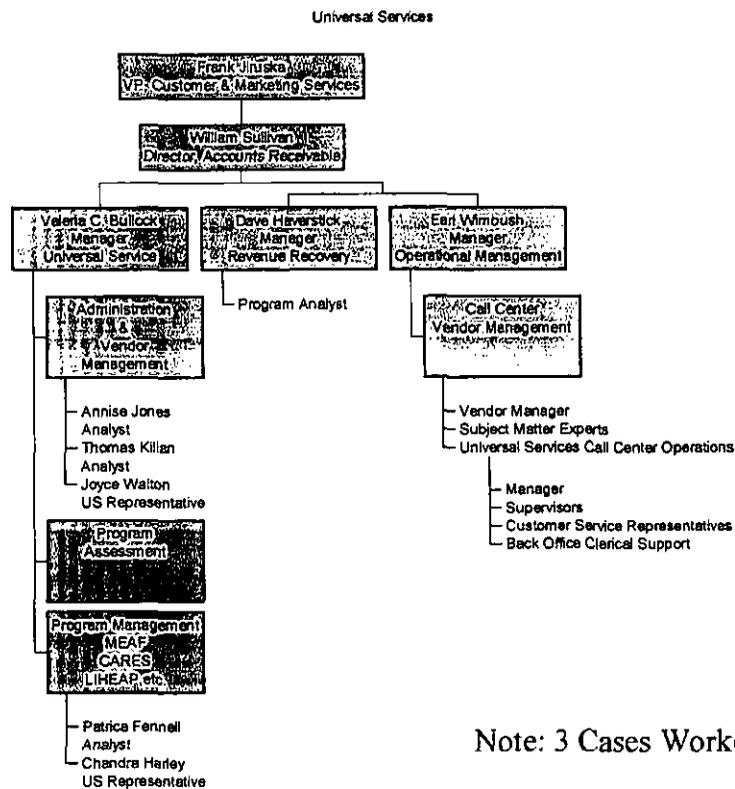
Customers who qualify and are placed on the CAP Rider will have their pre-program arrearage forgiven if they remain current on their CAP bill for six consecutive months. The development of any new arrearage during this period will delay forgiveness. Customers that develop any new arrearage will be offered a payment agreement.

Transmission Charges – Continued

Rate R - CAP A	Per kWh (except where noted)
1st 1000 kWh	28¢
Over 1000 kWh	CAP D
Rate R - CAP B	
1st 500 kWh	.08 ¢
Next 100 kWh (June - Sept only)	.39 ¢
Additional	.55 ¢
Rate R - CAP C	
1st 500 kWh	.14 ¢
Next 100 kWh (June - Sept only)	.39 ¢
Additional	.55 ¢
Rate R - CAP D	
1st 500 kWh	27 ¢
Additional	.55 ¢
Customer Credit *	(.28 ¢)
Rate R - CAP E	
1 st 500 kWh	.41 ¢
Additional	.55 ¢
Customer Credit *	(.14 ¢)
Rate RH - CAP A	
1st 2000 kWh Winter	\$1.00
1st 1000 kWh Summer	\$1.00
Over 2000/1000 kWh	CAP D
Rate RH - CAP B	
Winter	
1st 500 kWh	.08 ¢
Additional	27 ¢
Summer	
1st 500 kWh	.08 ¢
Next 100 kWh (June - Sept only)	.39 ¢
Additional	.55 ¢
Rate RH - CAP C	
Winter	
1st 500 kWh	.14 ¢
Additional	27 ¢
Summer	
1st 500 kWh	.14 ¢
Next 100 kWh (June - Sept only)	.39 ¢
Additional	.55 ¢
Rate RH - CAP D	
Winter	
All kWh	27 ¢
Customer Credit *	(.28 ¢)
Summer	
1 st 500 kWh	27 ¢
Additional	.55 ¢
Customer Credit *	(.28 ¢)
Rate RH - CAP E	
Winter	
1 st 500 kWh	.41 ¢
Additional	27 ¢
Customer Credit *	(.14 ¢)
Summer	
1 st 500 kWh	.41 ¢
Additional	.55 ¢
Customer Credit *	(.14 ¢)

* Customer Credit when obtaining competitive energy on 1st 500 kWh

PECO Universal Services



Note: 3 Cases Workers will be added as part of consensus plan.

10/01/2002

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October 3, 2002

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Via FedEx

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OCT 03 2002

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Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: PECO Energy Company, Docket No. M-00001418
R-00027870
Revised Pages to Petition for Expedited Approval of Consensus Modifications

Dear Secretary McNulty:

Enclosed for filing with the Commission are an original and three (3) copies of replacement pages to supersede original Pages 3, 17 and 22 of the Petition for Expedited Approval of Consensus Modifications to PECO Energy Company's Universal Service Program and Associated Tariff Changes, which was originally sent to you on October 1, 2002.

As proof of filing, please date stamp and return the extra copy of this cover letter in the enclosed return envelope.

Sincerely,

Kent D. Murphy
Kent D. Murphy
Assistant General Counsel

DOCKETED
JAN 10 2003

KDM/zr

**DOCUMENT
FOLDER**

Enclosures

cc: Certificate of Service

SRB

117

Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval Of Its Restructuring Plan et al, Joint Petition for Settlement; Docket Nos. R-00973953 and P-00971265.

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Philadelphia, PA 19103
Dated: October 1, 2002

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OCT 03 2002

an expedited basis, by no later than December 1, 2002.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In support of its request, PECO states as follows:

I. SUMMARY OF PETITION

The consensus terms and conditions set forth in this document constitute a means to resolve, fairly and equitably, the universal services issues arising from PECO's Universal Service and Consensus Plan, submitted April 14, 2000 and the Merger Settlement as well as some additional issues addressed herein. Approval of this Petition and implementation of the program modifications and associated tariff changes will create significant benefits for PECO's low-income customer population and avoid protracted litigation. These benefits come in the form of enhanced universal services resources being made available to special needs customers, identified as those customers at the lowest level of poverty with incomes between 0-50% of federal poverty level, through substantial rate discounts under the modified CAP program. The modified CAP program also includes a component to provide additional affordability assistance to those customers whose income is between 0-25% of the federal poverty level and have experienced an extenuating circumstance that affects their continued ability to pay. As such, each of the proposed modifications intended to achieve the goals of the Commission's regulations and policies concerning universal service programs.

Specifically, in response to the September 29 Order, the consensus modifications provide substantial CAP Rate discounts that will benefit "special needs" customers with household incomes of less than 50 percent of federal government poverty level guidelines ("FPL"). As described in detail below at Section III.A, these tariff changes provide three additional tiered rate discounts under the Company's CAP schedule ("CAP Rider A, B, and C") that will now

Service program modifications, as described above, fully function no later than the end of the 9th calendar month following a final Commission order approving the Petition.

K. Waiver of 52 Pa. Code § 54.74 Filing Requirement.

52 Pa. Code § 54.74 requires the Company to make a filing every three years in which it describes its universal services and energy conservation plan. Under these regulations, PECO's next plan submission in compliance with Section 54.74 of the Commission's regulations is due no later than February 28, 2003. Such update is required to provide the Commission with the status of the Company's Universal Service Plan including but not limited to program changes that have been implemented. However, other than the program changes proposed in this Petition, PECO's Universal Services and Energy Conservation program remains unchanged from that approved by the Commission in the September 29 Order. Accordingly, PECO requests waiver of 52 Pa. Code S 54.74 filing requirement to the extent that such regulation would require PECO to make a Universal Service Plan filing that includes the modifications in this Petition prior to February 28, 2006. Waiver of such requirement would allow PECO to focus its energy on implementing the program changes called for in this Petition so that affected customers can derive the benefits of the program changes as soon as possible.

Accordingly, along with the other modifications proposed for the CAP Rate program concerning income verification and medical certification policy, the Company's CAP Rate program is consistent with the Commission's regulations and should address the concerns expressed by the Commission with respect to the affordability of the CAP Rate program for all CAP eligible customers, including those with the lowest incomes.

C. The Consensus Modifications are Consistent With Commission Policies Promoting Negotiated Solutions.

PECO and the LIURP Advisory Committee arrived at the consensus modifications after conducting extensive analysis, through the efforts of Dr. Peach, the Company and other Committee members, and after engaging in in-depth technical discussions over many months. As a result, the consensus terms and conditions that developed through those efforts constitute a carefully crafted package representing reasonable negotiated compromises on the issues addressed herein. Thus, the PECO Universal Service Petition is consistent with the Commission's rules and practices encouraging negotiated settlements (see 52 Pa. Code §§ 5.231, 69.391, 69.401). While not the result of settlement discussions in a litigated proceeding, advocates from each of the interested parties participated in a collaborative effort to produce these consensus modifications.

D. Expedited Approval is Needed So That the Benefits of The Consensus Modification May Be Provided As Soon As Possible.

PECO Energy requests that the Commission expedite its approval of the consensus modifications so that the Company may implement the necessary changes as soon as possible. In this respect, all of the tariff changes will be implemented no later than the end of the ninth month

DOCUMENT
FOLDER

ORIGINAL

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PECO Energy Company's :
Submission of Universal Service :
and Energy Conservation Plan :
in Compliance with Section 54.74 : Docket No. M-00001418

RE-00027890

ERIC JOSEPH EPSTEIN'S, *Pro se*
SUPPORT & CONCURRENT MOTIONS
RE: PETITION FOR EXPEDITED APPROVAL of
CONSENSUS MODIFICATIONS to PECO ENERGY
COMPANY'S UNIVERSAL SERVICE PROGRAM
and ASSOCIATED TARIFF CHANGES

ERIC JOSEPH EPSTEIN, *Pro se*
4100 Hillside Road
Harrisburg, PA 17112

SECRETARY'S BUREAU

2002 OCT 21 AM 9:28

RECEIVED

DATED: OCTOBER 18, 2002

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R-00027870

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
North Office Building, Room B-18
Commonwealth Avenue and North Street
Harrisburg, PA 17105-3265

RECEIVED

OCT 21 2002

Dear Secretary McNulty:

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Enclosed please find an original and three copies of Eric Joseph Epstein's Comments regarding the Above-Captioned Complaint.

1) Eric Joseph Epstein, ("Epstein" or Mr. Epstein"), was an active participant and a signatory to the Joint Petition for Settlement: Application of PECO Energy Company, Pursuant to Chapters 11, 19, 21, 22, & 28 of the Public Utility Code, for Approval of (1) A Plan of Corporate Application Docket No. Restructuring, Including the Creation of A Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation: Docket No: A-110550F0147; (1)

2) Mr. Epstein actively participated in Settlement Negotiations conducted in Philadelphia. Epstein advocated for resolution of the following issues: nuclear decommissioning; planned operating life of PECO's nuclear generating stations; Spent Fuel Isolation; "Low-Level" Radioactive Waste Isolation; **rate payer equity; and, community investment in south central Pennsylvania** (2) (*Highlight added*);

1 As part of the Negotiated Settlement, Mr. Epstein and PECO Energy stipulated **Appendix B: Nuclear Monitoring and Waste Storage Agreement**. Appendix B is currently in force and being implemented by both parties.

2 Please refer to Eric Joseph Epstein's Petition in Support of the Negotiated Settlement, and Eric Joseph Epstein's Testimony Statement No. 1, Regarding Nuclear Decommissioning, Planned Operating Life of PECO's Nuclear Generating Stations, Spent Fuel Isolation, Low-Level Radioactive Waste Isolation and Rate payer Equity & Community Investment. Both documents were entered into Evidence at the Evidentiary Hearing held on May 10, 2000.

DOCKETED

1

OCT 28 2002

4) The Public Input Hearing Schedule promulgated in the January 28, 2000 PREHEARING ORDER did not include a forum anywhere in south central Pennsylvania despite PECO Energy's presence in the region;

5) Mr. Epstein requested the Commission reconsider, and include an additional public input hearing in York, Pennsylvania, which was so ordered by The Honorable Charles E. Rainey, Jr., on February 22, 2000;

6) Mr. Epstein filed a Statement of Support included in the RECOMMENDED DECISION on June 1, 2000, which noted, "**5) Community Investment** - Community investment levels in south central Pennsylvania will increase by 5% per year over a 60 month period;

7) More recently, on February 6, 2002, Mr. Epstein strongly supported PECO Energy Company's Supplement No. 34. Tariff Electric No. 3;

8) Clearly, Eric Joseph Epstein has remain engaged in the Settlement Process, and has an interest in any proceeding they has the potential to South Central Pennsylvania residents;

9) By and large, Mr. Epstein conditionally supports the PETITION FOR EXPEDITED APPROVAL of CONSENSUS MODIFICATIONS to PECO ENERGY COMPANY'S UNIVERSAL SERVICE PROGRAM and ASSOCIATED TARIFF CHANGES;

10) The issues of concern for Mr. Epstein relate to "a consensus proposal" representing "Universal Services";

11) Epstein acknowledges that York County covers a fraction of PECO Energy's customer base;

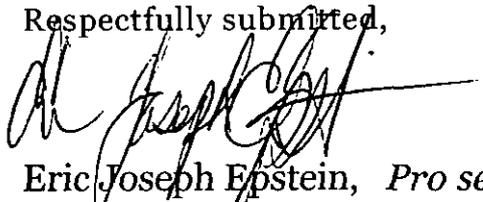
12) However, as an advocate for this community, Mr. Epstein believes that any "Universal Program" built upon "consensus" should include all PECO Energy customers; regardless, of their demographic value and/or net consumption;

13) Mr. Epstein strongly supports the Expedited Approval predicated on two caveats:

1) Placement of a community representative from South Central Pennsylvania on the Low Income Us Usage Reduction program LIURP ADVISORY COMMITTEE, i.e., Mason-Dixon Community Services or the EFMR Monitoring Group; and,

2) Inclusion of this representative in process, protocol or organized entity that acts to monitor and implement terms of the Present Petition.

Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillside Drive,
Harrisburg, Pa., 17112.
Voice Mail: 717-541-1101
Facsimile: 717-541-5487
epstein@igc.apc.org

DATED: OCTOBER 18, 2002

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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SECRETARY'S BUREAU

**PECO Energy Company's :
Submission of Universal Service :
and Energy Conservation Plan :
in Compliance with Section 54.74 : Docket No. M-00061418**

R-00027870

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery in accordance with the requirements of 52 Pa. Code § Section 1.54.

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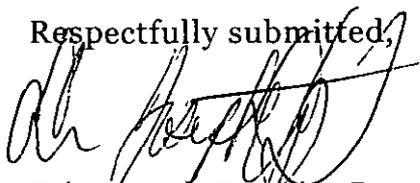
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Counsel for CEPA, ACORN, TAG &
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Piper, Marbury et al
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Chicago, Illinois 60601

Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112

DATE: October 18, 2002

COMMONWEALTH OF PENNSYLVANIA

DATE: October 23, 2002

SUBJECT: R-00027870

TO: Bureau of Fixed Utility Services

FROM: James J. McNulty, Secretary *JJ*

PECO ENERGY COMPANY

Attached is a copy of a Petition of Peco Energy Company for Expedited Approval of Consensus Modifications to Universal Service Program and Associated Tariff Changes, filed in connection with the above docketed proceeding.

This matter is assigned to your Bureau for appropriate action.

Attachment

cc: LAW
BCS

was

DOCUMENT
FOLDER

DOCKETED
OCT 23 2002