



August 5, 2016

VIA E-Filing

Secretary Rosemary Chiavetta
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: **Petition of PPL Electric Utilities Corporation for Approval
to use the Remote Service Switch in its Meters for
Involuntary Service Terminations**

Docket No. P-2016-2524581

Dear Secretary Chiavetta:

Enclosed please find the Statement in Support of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) of the Joint Petition for Approval of Settlement filed in the captioned proceeding.

Copies have been circulated pursuant to the attached Certificate of Service. Please contact me should you have any questions or concerns about any aspect of this filing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Patrick M. Cicero".

Patrick M. Cicero

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation for :
Approval to use the Remote Switch Service in : P-2016-2524581
its Meters for Involuntary Service Termination :**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Statement in Support of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL and/or FIRST CLASS MAIL

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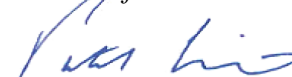
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval to use the :
Remote Switch Service in its Meters for : **P-2016-2524581**
Involuntary Service Termination :

**STATEMENT IN SUPPORT OF SETTLEMENT OF THE COALITION FOR
AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA
(CAUSE-PA)**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), by its counsel at the Pennsylvania Utility Law Project, submits this Statement in Support of the Joint Petition for Settlement of all issues in the captioned proceeding. CAUSE-PA joins the other parties and requests that the Pennsylvania Public Utility Commission (Commission) approve the Settlement without modification.

I. INTRODUCTION

CAUSE-PA intervened in this proceeding because it was concerned about the impact of involuntary service termination by remote switch on moderate and low income residential customers, as this population is at the highest risk of involuntary termination. Specifically, it was critical for CAUSE-PA to resolve the potentially negative aspects of PPL Electric Utilities Corporation’s (PPL) plan, and to ensure that the positive aspects of the plan were not changed. CAUSE-PA was specifically concerned about:

- (a) Ensuring that any involuntary service termination by remote service switch complies with statutory and regulatory requirements, including of Chapters 14 and 56 and the

Discontinuance of Service to Leased Premises Act.

- (b) Ensuring that PPL's termination procedures include actual, in person notice to the customer of the termination prior to the remote disconnection.
- (c) Ensuring clear information is given to all customers prior to termination about how a termination can be avoided, including PPL's Universal Service Programs.
- (d) Ensuring simple and streamlined procedures for reconnections following an involuntary termination of service.
- (e) Ensuring any savings realized by remote termination are passed on to ratepayers.

Although no testimony was presented in this case, CAUSE-PA actively participated in informal discovery and negotiations with PPL, the Office of Consumer Advocate (OCA) and the Office of Small Business Advocate. These good faith discussions with the other parties have achieved a negotiated resolution of the contested issues that alleviates the need for further proceedings.

For the reasons that follow, the Settlement is in the public interest in that it addresses issues of concern affecting PPL's low-income customers, balances the various interests of the parties, and resolves the contested issues fairly. If approved, the Settlement will eliminate the possibility of further litigation and appeals along with their attendant costs.

II. BACKGROUND

CAUSE-PA adopts the background set forth in Paragraphs 1-9 of the Joint Petition for Settlement as if fully stated herein.

III. REASONS FOR SUPPORT OF THE SETTLEMENT

The following terms of the Settlement address issues of concern to CAUSE-PA and reflect a carefully balanced compromise of the interests of all the parties in this proceeding:

In paragraph 12, PPL has agreed that it will comply with all provisions of Chapter 14 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1401 et seq., and Chapter 56 of the PUC's regulations, 52 Pa. Code § 56.1 et seq. with respect to the application of remote connect and disconnect for voluntary service termination. While this may seem like a given, an essential element of the Settlement was PPL's commitment not to seek a waiver of any of these provisions.

Paragraphs 13 – 16 provide essential details about the operation of PPL's remote disconnection procedures, each of which were carefully negotiated by the parties. Specifically, through these provisions, PPL has committed to:

- Sending an appropriately trained field representative to the customer's premises on the day that termination is scheduled to occur who will use reasonable efforts to make personal contact with a responsible adult occupant of the premises prior to the termination. (Joint Petition ¶ 13.)
- Training field representatives on medical certificate procedures, relevant complaint procedures, general familiarity with Protection from Abuse ("PFA") Orders, and how to refer customers to PPL Electric's universal service programs. In addition, the field representatives will be trained to call PPL Electric staff for further guidance if presented with a PFA Order. (Joint Petition ¶ 14).
- A process where, if the field representative is not able to make personal contact prior to termination, the field representative will leave a notice at the residence informing the customer that utility service is being disconnected and how the customer can

reconnect. The notice will include a contact number to PPL staff where low-income and vulnerable customers can receive information on PPL Electric's Universal Service and Energy Conservation programs and related payment information. (Joint Petition ¶ 15).

- Not terminating service if the field representative becomes aware of a personal safety condition that warrants delay in service termination, including if the field representative is informed that the occupant is seriously ill or has a medical condition which will be aggravated by cessation of service and that a medical certificate will be procured pursuant to 52 Pa. Code § 56.112. (Joint Petition ¶ 16).
- Training field representatives to direct low-income and vulnerable customers to the line to reach PPL Electric staff where the customer can receive information on all PPL Electric's Universal Service and Energy Conservation programs and related payment information. (Joint Petition ¶ 16).

Each of these protections are designed to ensure that PPL's remote disconnection procedures comply with the statute and regulations, but also that PPL commit to specifically train its field representatives to recognize and meet the needs of PPL's low-income and vulnerable customers. Pennsylvania has periods of very cold and very hot weather which can cause health and safety concerns, especially for at-risk customers. The use of remote disconnection of essential utility service requires the protections outlined above to avoid potentially disastrous consequences. This is particularly essential for customers who are victims of domestic violence or have a medical condition which would be aggravated by the termination of service. Both customer groups are entitled to additional protections under applicable law, and PPL's commitment to ensure that its

employees are appropriately trained to recognize and ensure compliance with these protections was essential to obtaining CAUSE-PA's support for the settlement and is in the public interest.

Paragraphs 17-19 ensure that customers, not just PPL, benefit from the use of remote disconnection. Specifically, these provisions provide that PPL will expand its reconnection hours from 7am to 10pm seven days per week, and will reduce its reconnection fee to \$14 for residential and small commercial & industrial customers. Both the expansion of reconnection hours and the reduction in reconnection fees are essential components of this settlement. Low-income households often have working hours that are neither consistent nor within the bounds of a traditional work day. The ability to reconnect earlier in the morning or later in the evening is an essential component of the promised convenience of smart meters with remote connection/disconnection functionality. The same is true of a reduced reconnection fee. Since PPL will be avoiding costs associated with the use of remote reconnection, it is within the public interest that this reduction of costs be passed onto consumers through a reduction in the reconnection fee.

Finally, in paragraph 20, PPL commits to providing annual updates at its smart meter stakeholder meeting regarding the frequency and effectiveness of the use of its remote disconnection/reconnection technology. The information PPL proposes to share includes the number of remote disconnections and reconnections, as well as the average time that it took to process a reconnection for a customer. This information will allow the parties to this proceeding, the public generally, and the Commission to assess whether additional changes are needed.

IV. CONCLUSION

The Joint Petitioners arrived at the Settlement terms after conducting informal discovery and engaging in discussions over several months. The terms and conditions outlined here, and those contained in the Joint Petition itself, constitute a carefully crafted package representing a reasonably negotiated compromise on the issues of concern to each party in this proceeding. Thus, the Settlement is consistent with the Commission's rules and practices encouraging negotiated settlements (see 52 Pa. Code §§ 5.231, 69.391 and 69.401). Furthermore, acceptance of the settlement avoids the necessity of administrative proceedings that would have come at a substantial cost of time and resources.

Accordingly, CAUSE-PA respectfully requests that the Commission approve the Joint Petition for Settlement without modification.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
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Date: August 5, 2016