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December 15, 2016

VIA ELECTRONIC FILING

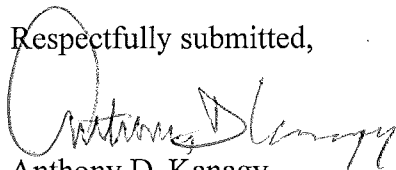
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PECO Energy Company Pilot Plan for an Advance Payments Program and Petition
for Temporary Waiver of the Commission's Regulations With Respect To That Plan
Docket No. P-2016-2573023**

Dear Secretary Chiavetta:

Enclosed please find the Comments of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/skr
Attachment

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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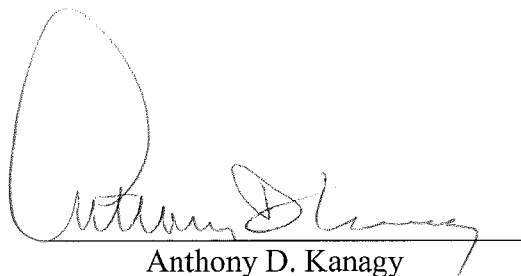
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Harrisburg, PA 17102

Date: December 15, 2016



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company Pilot Plan for an	:	
Advance Payments Program and Petition for	:	Docket No. P-2016-2573023
Temporary Waiver of the Commission's	:	
Regulations With Respect To That Plan	:	

**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

I. INTRODUCTION

Pursuant to the Pennsylvania Bulletin Publication Notice of November 12, 2016 in the above-captioned proceeding, PPL Electric Utilities Corporation ("PPL Electric") hereby files Comments in support of PECO Energy Company's ("PECO") Advanced Payments Pilot Program ("Advance Payment Pilot"). PPL Electric is not commenting on the specific aspects of PECO's Advance Payment Pilot, but is submitting these Comments in support of Advance Payment Pilots in general. PPL Electric notes that it is evaluating whether to file its own Advance Payment Pilot. PPL Electric believes that Advance Payment Programs can provide benefits to customers and believes that the Pennsylvania Public Utility Commission ("Commission") should provide electric distribution companies ("EDCs") with flexibility to design different Advance Payment Programs to accommodate each EDC's individual circumstances, to test customers' reactions and experience to different program rules and to allow parties to learn best practices.

II. COMMENTS

A. UTILITIES AND CUSTOMERS IN OTHER STATES HAVE EXPERIENCED BENEFITS FROM ADVANCE PAYMENT PROGRAMS.

PECO notes in its filing that a number of Advance Payment Programs have been adopted in other states. PECO explains that the results from these programs have been promising. (PECO Petition, pp. 4-5.)

PPL Electric has also investigated Advance Payment Programs offered by utilities in other states. PPL Electric agrees that these utilities and their customers have experienced benefits from Advance Payment Programs. Customer benefits include more options for paying for electric service, reduced fees, increased control over finances, increased understanding and awareness of energy use, no “surprise” bills, increased customer satisfaction and others. Utility benefits include reduced bad debt, reduced truck rolls and improved call center metrics.

Results from other states have shown a broad range of participants in advance payment programs. The typical split of participants is 60% low-income and 40% non-low-income. Typical participants also include millennials, small commercial customers and college students. A broad range of the population has participated in advance payment programs.

B. PPL ELECTRIC ENCOURAGES ALLOWING EDCs FLEXIBILITY IN DESIGNING VOLUNTARY ADVANCE PAYMENT PROGRAMS.

PPL Electric encourages the Commission to allow EDCs flexibility in designing Advance Payment Programs to suit each EDC’s needs and to test different concepts with customers. This will allow parties the opportunity to learn best practices in designing future programs.

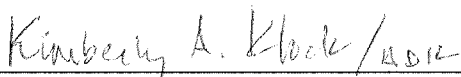
In this regard, PPL Electric notes that the Commission’s advance payment regulations were adopted well before EDCs installed smart meter technology. Technological advances warrant flexibility with respect to current regulations because newer technology provides

customers with greater knowledge of ongoing electric usage and the ability to quickly pay for more electricity.

III. CONCLUSION

PPL Electric Utilities Corporation appreciates the opportunity to file Comments with respect to PECO Energy Company's Advance Payment Program. Both customers and utilities can benefit from Advance Payment Programs and the Pennsylvania Public Utility Commission should allow EDCs flexibility in designing Pilot Advance Payment Programs.

Respectfully submitted,



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