

COMMONWEALTH OF PENNSYLVANIA



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June 7, 2017

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: PPL Electric Utilities Corporation Universal
Service and Energy Conservation Plan for
2017-2020 Submitted in Compliance with 52
Pa. Code § 54.74
Docket No. M-2016-2554787

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
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Certificate of Service

*234274

CERTIFICATE OF SERVICE

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2554787
2017-2019 Submitted in Compliance with 52 :
Pa. Code § 54.74

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Comments in the manner and upon the persons listed below:

Dated this 7th day of June 2017.

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2554787
2017-2019 Submitted in Compliance with 52 :
Pa. Code § 54.74 :

COMMENTS
OF THE
OFFICE OF CONSUMER ADVOCATE

The Office of Consumer Advocate (OCA) files these Comments pursuant to the Pennsylvania Public Utility Commission’s (Commission) directive in the Tentative Order dated April 6, 2017.¹

I. INTRODUCTION

On June 30, 2016, PPL Electric Utilities Corporation (PPL or Company) filed its Universal Service and Energy Conservation Plan (USECP or Plan) for 2017 through 2020, in accordance with the Commission’s regulations at 52 Pa. Code §§ 54.71-78. On April 6, 2017, the Commission entered its Tentative Order on the Plan which requested Comments from interested parties. The Commission requested that PPL provide Supplemental Information within twenty (20) days from the Order and requested Comments from parties twenty days thereafter. On April 26, 2017, PPL filed its Supplemental Information. On May 3, 2017, the Commission issued a Secretarial Letter and requested additional information. On May 18, 2017,

¹ The OCA was assisted in the preparation of these Comments by its consultant, Roger D. Colton. Roger Colton is a principal in the firm of Fisher Sheehan & Colton, Public Finance and General Economics. Mr. Colton provides technical assistance to a variety of public utilities, state agencies, and consumer organizations on rate and customer service issues for telephone, water/sewer, natural gas and electric utilities. Mr. Colton’s work focuses on low-income energy issues, and he has testified and published extensively in this area.

PPL filed Additional Supplemental Information in response to the Secretarial Letter, and on May 28, 2017, the Company filed Comments.

PPL's 2017-2020 Universal Service and Energy Conservation Plan contains four components: (1) a Customer Assistance Program (CAP), OnTrack, which provides discounted rates for low-income customers; (2) Low Income Usage Reduction Program (LIURP), the Winter Relief Assistance Program (WRAP), that provides weatherization and usage reduce services to help low-income customers; (3) a Customer Assistance Referral and Evaluation Services (CASES) program that provides referral services for low-income customers with special needs; and (4) a Hardship Fund that provides grants to customers who have had their utility service terminated or are in danger of termination.

In the April 6, 2017 Tentative Order in this proceeding, the Commission requested additional information from PPL on a large number of important and inter-related issues including the following:

- (1) Explain how customers enrolled in OnTrack over the telephone are educated about the benefits and responsibilities of the program and explain what aspects of OnTrack enrollment are handled in house by PPL customer service representatives and what aspects are handled by OnTrack agencies.
- (2) Explain whether the Company is developing or exploring the use of web-based applications and electronic documentation process for OnTrack and, if so, explain how customer education will be handled during this process.
- (3) Explain how the Company determines a customer's "ability to pay" when choosing the appropriate OnTrack payment option. Pursuant to the directives in this Order, the Company should also provide average energy burden levels for the full-year OnTrack participants in 2014, 2015, and 2016.
- (4) Address the Commission's questions concerning OnTrack Lifestyle.
- (5) Identify whether PPL will offer automatic recertification for OnTrack to OTBB participants and, if so, the estimated timeframe and costs of implementing this change.

- (6) Explain what amount the Company requires customers to pay to re-enroll in OnTrack more than six months after removal for non-payment. PPL should identify whether customers who default from OnTrack for non-payment reasons can also re-enroll in the program within six months by paying the OnTrack catch-up amount.
- (7) Address whether the Company will develop a procedure to automatically refer and prioritize high usage OnTrack customers for LIURP and screen new OnTrack enrollees for WRAP eligibility. PPL should also provide additional details about its OnTrack consumption policy and its “OnTrack high usage approach.”
- (8) Identify what steps the Company is taking to address OnTrack budget billing disparities when customers relocate.
- (9) Explain if the “16% rule” has been applied to non-heating accounts or customers with incomes at or below 50% of the poverty level and identify how many customers had OnTrack payments calculated to exceed 16% of income in 2014, 2015, and 2016 and whether any of these customers were referred to and received WRAP services.
- (10) Address the Commission’s questions concerning unearned income for OnTrack eligibility.
- (11) Address the Commission’s questions regarding relaxation of the usage thresholds for coordinated LIURP jobs.
- (12) Provide requested details about the WRAP intake process and program assignment through the LEAP system.
- (13) Update the WRAP needs assessment with the requested information.
- (14) Explain what policies or practices have led to the significant increase in OnTrack enrollment and identify the average OnTrack application processing time for each of its OnTrack agencies.
- (15) Explain what factors are driving the increase in OnTrack program costs and provide requested information.
- (16) Explain the anticipated annual increase in the CARES budget.
- (17) Clarify the staffing level for its CARES program.

Tentative Order at 38-40.

The Commission’s May 8, 2017 Secretarial Letter requested additional information regarding: (1) the Company’s average energy burden levels; (2) re-enrollment in OnTrack for non-payment; (3) pre-enrollment energy burdens; (4) the number of customers in OnTrack with arrears and the total dollar amount in arrears; (5) clarification of the \$5 arrearage co-payment policy; and (6) an update on the WRAP needs assessment.

The OCA addresses the following issues in its Comments: (1) OnTrack program budget; (2) the affordability burdens; and (3) automatic recertification for budget billing customers. The OCA has also raised four additional issues regarding: (1) the treatment of zero income customers; (2) the maximum CAP credit; (3) failure to recertify; and (4) the APPRISE evaluation regarding the effectiveness of WRAP.

II. COMMENTS

A. OnTrack Program Budget

The Commission’s Tentative Order requested additional information regarding the factors driving the increases in OnTrack program costs. Tentative Order at 31-35. In its Plan, the Company proposes to significantly increase the program budget over the next three years of the OnTrack program. PPL Proposed 2017-2019 Plan at 28-29. For 2017, PPL proposes a budget of \$106 million, with an increase of \$12 million in 2018. Id. PPL proposes another \$11 million increase to \$129 million in 2019. Id. at 29. The costs of the program include the cost of the CAP shortfall, or OnTrack credits, arrearage forgiveness and external administration. Id. at 28.

PPL OnTrack Budget by Year: 2014 – 2019 (million \$s) ²					
2014 /a/	2015 /a/	2016 /a/	2017 /b/	2018 /b/	2019 /b/
\$56.6	\$62.8	\$65.4	\$106	\$118	\$129

² Note that in contrast to the next Table, this Table presents *budgeted* expenditures. The next Table presents *actual* expenditures.

NOTES:

/a/ PPL 2014 – 2016 USECP, page 20.

/b/ Tentative Order, PPL USECP, page 29

The program costs are projected to increase from a total program expenditure of \$83.6 million for 46,936 participants in 2015 (\$1,781 per participant)³ to the proposed 2019 budget of \$129 million for projected 67,500 participants (\$1,911 per participant).

	2015	2016	2017	2018	2019
Participants	46,936 ⁴	56,233 ⁵	57,000 ⁶	62,500 ⁷	67,500 ⁸
Program Cost	\$83,614,471 ⁹	NA ¹⁰	\$106,000,000 ¹¹	\$118,000,000 ¹²	\$129,000,000 ¹³
Cost/Participant /a/	\$1,781	NA	\$1,860	\$1,888	\$1,911

The OCA has significant concerns with the Company's proposed budget increase for its 2017-2019 USECP and submits that a collaborative should be established to discuss potential CAP program design changes to reduce the costs of the program. The costs of PPL's CAP program are recovered from all non-CAP residential ratepayers, both low-income and non-low-income.

In its Comments, PPL identifies multiple factors for the increases in costs for its program. PPL Comments at 21. PPL states that the active participants have increased since 2013 from 35,197 participants to 53,970 participants in 2016. The Company also states that the CAP credits and arrearage forgiveness components have, therefore, significantly increased. PPL states that

³ Note immediately preceding footnote.

⁴ Tentative Order, page 30.

⁵ Tentative Order, page 30.

⁶ Tentative Order, page 29.

⁷ Tentative Order, page 29.

⁸ Tentative Order, page 29.

⁹ Tentative Order, page 32.

¹⁰ Not reported in Tentative Order. 2016 BCS report not yet published.

¹¹ Tentative Order, page 31.

¹² Tentative Order, page 31.

¹³ Tentative Order, page 31.

the most significant impact to the CAP costs is the increase in the amount of CAP credits due to the number of participants. PPL Comments at 21. The OCA submits that PPL's average annual CAP credits are significantly higher than other utilities. According to the 2015 BCS Universal Service Report, PPL's average annual electric CAP credits were \$1,300 in 2014 and \$1,187 in 2015.¹⁴ Bureau of Consumer Services 2015 Report on Universal Service Programs and Collections Performance at 44. PPL's CAP credits were the highest amount of CAP credits provided across all utilities with universal service programs (both electric and natural gas distribution companies). The next closest electric distribution utility was Met-Ed with average annual CAP credits of \$800 in 2014 and \$756 in 2015. Id. at 43. The disparity is even greater with the difference with average annual arrearage forgiveness of \$512 in 2014 and \$587 in 2015 for PPL. The next closest utility was West Penn at \$196 in 2014 and \$206 in 2015. Id. at 44.

In its Comments, PPL attempts to distinguish itself from other electric distribution companies because of the number of households with electric heat and that the program operates on an 18-month cycle. PPL Comments at 22. The Company states that the movement to the 18 month timeline contributed to the increases which accelerated the amount of money forgiven over a 12-month timeframe. PPL Comments at 22. The OCA submits that while there are certainly program differences between PPL's program and the other utilities' programs, those differences should not result in such a significant cost disparity.

PECO serves a significantly larger population of CAP customers, and PPL's proposed budget for 2017-2019 would surpass PECO's 2015 program costs by approximately \$33 million. In 2015, PECO served approximately 138,650 CAP participants in 2015 at a cost \$96,675,303

¹⁴ The CAP Credit decreased from 2014 (\$1,300) to 2015 (\$1,187) even though the CAP Bill remained relative constant (\$83 in 2014 and \$85 in 2015). One possible reason for this is the extent of electric heating on the PPL system and the fact that the 2013/2014 winter was the heating season of the polar vortex (commonly thought to have been in place from December 2013 through April 2014).

(average cost of \$688), while PPL served 45,801 CAP participants at a cost of \$83,614,471 (average cost of \$1,826).¹⁵ PPL now proposes to enroll approximately 67,500 participants in 2019 at a cost of \$129 million (average cost of \$1,911).

The OCA submits that the Company's program design should be evaluated to determine whether there are ways to reduce the overall costs of the program. PPL argues that its unique program design and electric service territory have contributed to the problem. The OCA proposes that the Commission establish a collaborative as it recently did with the Duquesne universal service program to evaluate the overall design of the Company's CAP program to determine if there are ways lower the costs of the program.

B. Affordability Burdens

The Tentative Order identifies concerns with the Company's affordability burdens. Tentative Order at 14-15, 20-21, 35. The Commission asked the Company to provide additional information regarding: (1) how the Company determines a customer's "ability to pay" when choosing the appropriate OnTrack payment option; (2) if the Company has applied its 16% rule to non-heating accounts or customers with incomes at or below 50% of the poverty level and the number of customers who exceeded 16% of income in the years 2014-2016; and (3) the number of customers with energy burdens at or below recommended levels in the CAP Policy Statement. Tentative Order at 14-15, 20-21, 35.

The Company has three payment options: (1) Percent of Bill; (2) Minimum Payment; and (3) Agency Selected Payment. The Agency Selected Option is used if extenuating circumstances exist. PPL Comments at 5. In its Comments, PPL states that it examines the ability to pay by assessing the household's current financial situation and size. PPL Comments at 5. The Company clarifies that "financial situation means income level, after the necessary income and

¹⁵ 2015 BCS Report, at page 42 and page 47.

expense information has been acquired.” PPL Comments at 5. The CBO caseworker then selects an amount that appears to set the customer up for success in terms of on-time payments and elimination of pre-program arrears. PPL Comments at 5, citing PPL Proposed 2017-2017 USECP at 4. The OCA submits that energy affordability to all customers (including the near poor) must be considered as a part of the discussion regarding the programs. A change to the energy affordability burdens may affect the overall costs of the program, and as discussed above, PPL is already paying more in CAP credits and arrearage forgiveness than any other utility.

It is important to note that the Commission has opened an investigation regarding “Energy Affordability for Low-Income Consumers” (Docket No. M-2017-2587711) and/or the pending Commission proceeding involving a comprehensive “Review of Universal Service and Energy Conservation Programs” (Docket No. M-2017-2596907). The OCA submits that the Commission should limit its review of PPL’s energy burdens in this matter to whether or not PPL’s energy affordability burdens are within the Commission’s CAP Policy Statement. Any other energy affordability burden issues, not related to bringing the current design of the program into compliance with the current CAP Policy Statement, should be deferred to the pending Commission proceeding on energy affordability.

In response to the Commission’s questions, PPL’s analysis shows that the average energy burdens, including the \$5 co-payment and the CAP-Plus amount, are for the most part within the ranges of the Commission’s CAP Policy Statement for non-electric heating customers with incomes above 50% of Poverty. PPL Comments at 2. The range set forth in the CAP Policy Statement for non-electric heating customers at 0-50% of the FPL is 2-5%, from 51-100% is 4-6%, and for 101-150% is 6-7%. CAP Policy Statement, 52 Pa. Code § 69.265(2)(i)(A). A comparison of actual burdens (including the \$5 co-payment and CAP-Plus payments) to those

burdens is set forth in the Table below. While the burdens for the lowest income exceed the PUC guidelines when the CAP-Plus and Arrearage Co-payment are considered, the burdens for the other two Poverty ranges do not.

PUC Affordability Guidelines vs. PPL Burdens (including CAP-Plus and Arrearage Co-Payment) (Electric Non-Heating)				
	PUC Guidelines	2014 /a/	2015 /a/	2016/a/
0 – 50% FPL	2 - 5%	6%	7%	10%
51 – 100% FPL	4 – 6%	5%	5%	6%
101 – 150% FPL	6 - 7%	5%	5%	5%

PPL Supplemental Information, page 2 (May 3, 2017)

Similarly, PPL’s analysis shows that the average energy burdens, including the \$5 co-payment and the CAP-Plus amount, are for the most part within the ranges of the Commission’s CAP Policy Statement for -electric heating customers with incomes above 50% of Poverty. PPL Comments at 2. The average energy burdens for electric heating customers between 0-50% of the FPL in PPL’s program were within the range of the CAP Policy Statement in 2014, but not in 2015 or 2016. Id. In PPL’s program, the average energy burdens for electric heating customers between 51-100% of the FPL and 101-150% of the FPL ranged from 7-9% from 2014 through 2016, which is below the requirements of the CAP Policy Statement. Under the CAP Policy Statement, the lowest end of the range is 11% for electric heating customers between 51-100% of the FPL, and 15% for electric heating customers between 101-150% of the FPL.

PUC Affordability Guidelines vs. PPL Burdens (including CAP-Plus and Arrearage Co-Payment) (Electric Heating)				
	PUC Guidelines	2014 /a/	2015 /a/	2016/a/
0 – 50% FPL	7 – 13%	13%	14%	15%
51 – 100% FPL	11 – 16%	9%	9%	9%
101 – 150% FPL	15 – 17%	7%	7%	7%

In addition to the energy burdens, the Tentative Order also asked the Company to explain if the “16% rule” has been applied to non-heating accounts or customers with incomes at or below 0 to 50% of the Federal Poverty Level. Tentative Order at 20-21. PPL’s “16% rule” states that if all of the proposed payment options result in payments exceeding 16% of the customer’s income, the system will use 16% as the customer’s payment amount. PPL Proposed 2017-2019 USECP at 21. While 16% is within the range for electric heating accounts between 51-100% of the FPL and 101-150% of the FPL, 16% of the customer’s income would be significantly outside of the range for all non-heating electric accounts and for heating accounts between 0-50% of the FPL. PPL stated that they use the 16% maximum for all accounts, both heating and non-heating.

The OCA submits that the proposed collaborative for a CAP design should also examine the energy burdens for the non-electric heating customers to see if the program design can be amended to more effectively target the customers at the lowest end of the income range. The OCA submits that the Company should lower the maximum energy burden for the 0-50% heating accounts to 13% of income, or the top end of the range for heating customers. The Company should not use the 16% at all for customers who are non-heating customers. If there is a maximum rule applied to non-heating electric accounts, the maximum energy burden should be set at the maximums set forth in the CAP Policy Statement, 5% of income for 0-50% of the FPL, 6% of income for 51-100% of the FPL, and 7% for 101-150% of the FPL.

Finally, in the Tentative Order, the Commission identifies a concern that the \$5 copayment and CAP Plus amount impact the overall energy affordability for the CAP customers. Tentative Order at 14. The OCA submits that the CAP Plus amount is designed to address the

fact that many CAP customers will receive a LIHEAP grant and lowering the energy burden to reflect the CAP Plus amount undoes the purpose of the CAP Plus amount. As discussed in the Commission's decision in the 2014-2016 Plan, the "additional charge is used to offset program expenses for all residential ratepayers." PPL 2014-2016 USECP, Docket No. M-2013-2367021, Order at 13 (September 11, 2014). The OCA notes that PPL's CAP Plus has decreased significantly from \$8 when it was initially approved to \$3.00 in the November 2015-2016 period.

The OCA submits that energy affordability should be considered as a part of the collaborative discussion proposed by the OCA in this case. Energy affordability is a key component to analyzing the program costs. The OCA submits that any other energy affordability burden issues, not related to bringing the current design of the program into compliance with the current CAP Policy Statement, should be deferred to the pending Commission proceeding regarding "Energy Affordability for Low-Income Consumers" (Docket No. M-2017-2587711) and/or the pending Commission proceeding involving a comprehensive "Review of Universal Service and Energy Conservation Programs" (Docket No. M-2017-2596907).

C. Automatic Recertification for OnTrack Budget Billing Customers

The Tentative Order identified a concern that PPL excludes its OnTrack Budget Billing customers from receiving automatic recertification. Tentative Order at 16. The Company's Plan allows participants whose primary source of income is Supplemental Social Security (SSI) or who have received a Low Income Home Energy Assistance Program (LIHEAP) grant in the last 16 months to be automatically recertified for the OnTrack program for another 18 months. PPL 2017-2019 Plan at 18. According to the Plan, PPL's system will automatically review the OnTrack accounts to determine if the account qualifies for automatic recertification. Id. Customers who are re-enrolled as OnTrack Budget Billing (OTBB) customers are excluded from

automatic recertification. Tentative Order at 16; Plan at 18. Customers are enrolled in the OTBB only because the customer has exceeded the maximum CAP credit for the 18 month period. The OTBB allows the customer to receive arrearage forgiveness for the remainder of the 18 month period. Plan at 18; Tentative Order at 16. The Tentative Order recommended that the Company treat OTBB customers as full program participants and allow them to receive the benefit of automatic recertification if the customer had otherwise received SSI as their primary source of income or received LIHEAP in the last 16 months. Tentative Order at 16. The OCA supports the Tentative Order's proposal to allow OTBB participants to receive automatic recertification.

In its Comments, PPL agrees to allow for automatic recertification of OTBB when the customer meets all of the existing auto-recertification rules. PPL Comments at 7. As requested in the Tentative Order, PPL provided a cost estimate of \$19,000 and an estimated timeframe for completion of this work by April 2018. PPL Comments at 7. The Company stated that the timeframe for completion could change to an earlier or later date based on the Company's resources. The OCA submits that the Company should make the changes to its program as soon as possible.

E. Other Issues

1. Treatment of Zero Income Customers

PPL does not allow customers with zero income to enroll in its CAP program. PPL Proposed 2017-2019 Plan at 8-9. The Company's Plan states that it will allow a customer to enroll in CAP if the customer supplies information about unearned income such as assistance from family or other organizations. PPL Proposed 2017-2019 Plan at 8. The Company's Plan states "a zero income situation means there is no ability for the customer to meet a financial

obligation.” Id. at 9. The OCA submits that the Company’s Plan leaves out the potential scenario in which a customer may have zero new income, but the customer may still have some retained savings from previously earned income to be able to pay their bills or may have some other asset that it may be able to use over the short term to maintain the customer’s bills.

The Company states that “enrolling a zero income customer in the program will inevitably result in the customer being removed from the program for non-payment, thus resulting in a wasteful use of resources.” PPL Proposed 2017-2019 Plan at 9. Without CAP, however, the only alternative for zero income customers is to continue to try to pay the full residential rate bill and to be even more likely have their service terminated. A customer is much more likely to be able to come up with the minimum bill payment than the customer is able to pay the full residential rate. Moreover, the customer potentially could be earning arrearage forgiveness for whatever payments the customer is able to make. While the OCA agrees that zero income is not sustainable over the long-term, the OCA submits that the Company’s Plan completely excludes customers who have the greatest need for assistance.

Other electric distribution utilities allow zero income customers to enroll in CAP. Other utilities, however, have specific provisions that recognize that zero income is not a sustainable situation over the long-term. Zero income customers can be subject to the minimum payment and more frequent income verifications. For example, the FirstEnergy Companies require the customer to provide a zero income form. See, Met-Ed USECP 2015-2018 Plan at 9; Penn Power USECP 2015-2018 Plan at 9; Penelec USECP 2015-2018 Plan at 9; West Penn Power USECP 2015-2018 Plan at 9. The FirstEnergy Companies’ zero income form requires “the household to report how long the household has been without income and to explain how certain household expenses are met.” Id. Penn Power requires first-time zero-income applicants to recertify after

90 days and then on an annual basis. Id. Like the FirstEnergy Companies, Duquesne Light's USECP Plan allows CAP customers to submit a zero income form. Duquesne 2017-2019 USECP at 5-6. Duquesne requires the customer to recertify their income every 6 months and to notify the Company of any changes to their income status. Id.

The OCA submits that PPL should allow zero income customers to enroll in the OnTrack program at the minimum payment. PPL should also create parameters to provide for income verification on a more frequent basis to assess whether the customer has had changes in their zero income status.

2. Maximum CAP Credit

PPL's maximum credit is determined for the OnTrack participant over an 18 month period. PPL's Maximum CAP credits are as follows:

Income	Non-electric heat	Electric Heat
0-50% FPIG	\$1,585	\$4,027
51-100% FPIG	\$1,441	\$3,661
101-150% FPIG	\$1,310	\$3,328

Tentative Order at 10. The OCA submits that the Company's 18-month calculation of the maximum CAP credit will have a different impact on a CAP customer depending upon when the customer enrolls in the program. For example, if a participant enrolls in CAP in March, the CAP customer will have one non-heating seasons of CAP credit that goes into the customer's calculation of the maximum CAP credit. Customers, however, who enter in September will have two non-heating seasons of CAP credits that will go into whether they hit the maximum CAP credit ceiling. The 18-month period means that some customers will have two heating seasons

going towards their CAP credit ceiling while others do not. The OCA submits that the Company should attempt to address this inequity for CAP customers in the calculation of the maximum CAP credit.

3. Failure to Recertify

In its Plan, PPL states that a customer may be removed from OnTrack for failure to recertify the customer's income. PPL Proposed 2017-2019 Plan at 23-24; Tentative Order at 10. While the customer should be able to re-enter the program at any time by recertifying their income, the OCA submits that the customer should not be able to avoid responsibility for the CAP payment when seasonal fluctuations in usage may make it more attractive for the customer to remain off of the CAP program. The CAP program is designed to be structured to provide an affordable bill over the course of the year and to balance the costs for that customer, in the case of PPL's OnTrack program, over the course of 18 months. Removal of the responsibility for the CAP balance essentially allows the CAP customers to essentially "game" the system.

The OCA submits that similar to Columbia's Universal Service program, the Company should maintain a CAP customer's balance even if the CAP customer leaves the CAP program. Columbia Gas 2015-2018 USECP at 23. For example, when a customer at Columbia leaves the CAP program for any reason, but still remains a customer, the Company separately maintains a CAP balance, including CAP arrears, if any. Id. As the customer receives the non-CAP bill, the CAP balance will increase by the asked to pay amount. Should the customer reapply for CAP in the future, the CAP customer would first need to pay the full CAP balance, including amounts accrued while out of the program. Columbia does accept grant amounts in lieu of customer payments for re-enrollment. Id. The OCA submits that such a program design encourages the

customer to maintain year round participation and avoids seasonal fluctuations in CAP participation.

4. APPRISE Evaluation Regarding The Effectiveness of PPL's WRAP.

PPL's 2014 APPRISE Evaluation identified that PPL's baseload WRAP savings were only 8.1% in 2012. APPRISE Evaluation at xii. Full cost, or electric heating, savings were only 9.7% in 2012. APPRISE Evaluation at xii. The Penn State LIURP study for the Commission reported that the average electric heating savings was 20.3% while the average baseload savings were 19.1%. The APPRISE Evaluation states that almost 60% of the WRAP referrals are from the OnTrack program. APPRISE Evaluation at 51. The OCA submits that the savings achieved by WRAP appears to be significantly below the Penn State Study's statewide average for savings. The OCA submits that given the high cost of OnTrack's program, it is all the more important to have an effective LIURP program which maximizes the available savings for WRAP participants. The OCA submits that the proposed collaborative for CAP program design should also evaluate ways to increase the savings measures achieved for the WRAP participant households.

III. CONCLUSION

The OCA appreciates the opportunity to Comment on PPL's Universal Service and Energy Conservation Plan for 2017-2019. The OCA respectfully submits that its Comments and recommendations contained herein should be adopted.

Respectfully Submitted,

/s/ Christy M. Appleby
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DATE: June 7, 2017

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