

September 22, 2018

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SEP 22 2018

Secretary

Pa. Public Utility Commission

400 North Street, 2nd Fl

Harrisburg, Pa 17120

Re: C-2018-3003208

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Georgiana Freidel v. Duquesne Light Co.

Objections Re: hearing 9/18/18

Dear Secretary:

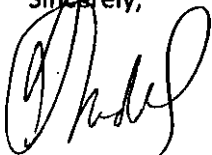
I am objecting to the results of the hearing above for the following reasons:

- 1) They refuse to bargain but pushed their agenda. I do not need another program.
- 2) They report to the PUC that they will offer programs to those in need, but I was not offered access to the CAP "exceptions" or a Hardship program.

Mr. Miller and Ms. Morris refused to answer about Exceptions for CAP payments. Please see Exhibit 1, page 6. The same information was in the filing of May 12, 2017. I meet 4 of the conditions.

Please order the Company to give me proper consideration for these programs.

Sincerely,



Georgiana Freidel

2. Maximum Annual CAP Discount

Effective March 28, 2018, the maximum annual discount for CAP customers will be \$1,500 for non-heating customers. Electric heating customers will continue to have a maximum annual discount of and \$1,800.

When a customer reaches the maximum annual discount within twelve months of the anniversary of the enrollment month, the customer is required to pay the budget bill at the full tariff rate.

Exceptions to Income Categories

Percent of Budget payments and maximum annual CAP discount amounts for CAP participants may be adjusted for extenuating circumstances including, but not limited to, the following:

- Addition to the household;
- ✓▪ Serious illness or medical condition;
- ✓▪ Consumption increase beyond control of customer (health related); *breathy*
- ✓▪ Severe weather conditions; and
- ✓▪ Structural damage to home.

3. Pre-Program Debt Forgiveness

A major benefit to customers who make full payments in accordance with their CAP payment plan is the complete forgiveness of their pre-program arrears. Customers who enroll in CAP with an outstanding balance have an opportunity to eliminate their pre-program arrears by making full payments of the CAP bill. Customers will receive debt forgiveness of 1/24th of their preprogram arrears with each full monthly payment. Customers also have the ability to receive arrearage forgiveness on catch-up payments made for past due monthly CAP balances. Customers will be granted one pre-program debt forgiveness opportunity, which will remain with the customer as long as he/she is enrolled in CAP. Delinquencies acquired within CAP are not eligible for forgiveness. If a customer is terminated or discontinues services prior to earning total forgiveness of their PPA amount, the customer may resume the pre-program arrears opportunity. For example.-

- A customer enrolls in CAP with \$240 pre-program delinquency. While enrolled in CAP, the customer earns \$140 in arrears forgiveness. Service is subsequently terminated or discontinued. The customer also has \$100 in CAP rate arrears at the time service ends. The customer subsequently establishes new service and has a total unpaid balance of \$200, which includes \$100 in CAP rate arrears and \$100 prior frozen arrears. When the new service is established and the customer is enrolled in CAP, he or she would be eligible for \$100 in pre-program arrears forgiveness. The \$100 billed at the CAP rate would not be

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CERTIFICATE OF SERVICE

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

FIRST-CLASS MAIL

Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Sharon E. Webb, Esquire
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
swebb@pa.gov

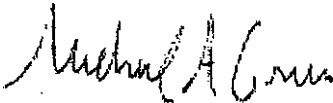
Christine M. Appleby, Esquire
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org

Patrick M. Cicero, Esquire
Pennsylvania Utility Law Project ↙
118 Locust Street
Harrisburg, PA 17101
pciceropulp@palegalaid.net

STEVENS & LEE

Dated: March 12, 2018

By: _____



Michael A. Gruin, Esquire.
Stevens & Lee
17 North Second Street, 16th Floor
Harrisburg, PA 17101
(717) 255-7365
mag@stevenslee.com

**Duquesne Light Company
Universal Service and Energy
Conservation Three Year Plan
2017-2019**

Revised May 12, 2017

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Based Organizations explaining the benefits of the CAP program and instructing the customer on how to apply for CAP. A Benefits Brochure will also be included; this brochure outlines the benefits and responsibilities associated with the CAP program. After a period of one month, if the customer has not enrolled in CAP, a second outreach will be made by the CBO –via phone, mail or electronic mail where the customer has consented to electronic communication.

a. Exceptions to Income Categories

Percent of budget bill and CAP maximum deficiency amounts for CAP participants may be adjusted for extenuating circumstances including, but not limited to, the following:

- Addition to the household;
- ✓ • Serious illness or medical condition;
- ✓ • Consumption increase beyond control of customer (health related);
- ✓ • Severe weather conditions;
- ✓ • Structural damage to home.

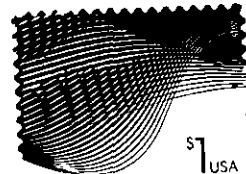
b. Customer Obligations

All customers remain in the program for as long as they are income qualified and comply with the CAP requirements and guidelines. Additionally, energy conservation plays an important role in helping CAP customers control their energy costs. Accordingly, customer obligations under CAP include:

- Customers are required to pay their bill each month, on time and in full.
- All electric heat customers may be required to schedule a Smart Comfort (LIURP) as a condition of participation in CAP.
- All residential service customers who own their home and have a base load usage in excess of 500 kWh per month may be required to complete a Smart Comfort visit before enrollment in CAP.
- All residential service customers who are renters, have a base load usage in excess of 500 kWh per month, and have resided at the premise for at least six months may be required to complete a Smart Comfort visit before enrollment in CAP, so long as landlord approves.
- CAP customers whose base load usage exceeds 500 kWh and who have not had a Smart Comfort (LIURP) visit within the last seven years may be required to complete a Smart Comfort visit.
- Customers who report \$0 household income at the time of enrollment are required to complete the “Zero Income Form” and give Duquesne Light permission to verify the income with government agencies such as the Internal Revenue Service (“IRS”) and through bankruptcy proceedings. Third party information used to verify customer income will apply to the timeframe at issue. The Company will provide customers



2
USA
DOLLARS

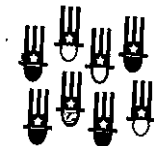


USA



USA

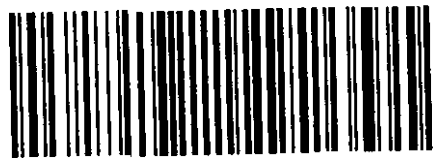
NON-MACHINEABLE SURCHARGE



ADDITIONAL OUNCE - USA

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAILTM



7006 3450 0002 1327 2978

Secretary

Pa. P.U.C.

400 North Street, 2nd Fl

Harrisburg, PA 17120

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