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FEDERAL EXPRESS

February 26, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

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FEB 26 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Universal Service and Energy Conservation Programs
§ 54.76 Evaluation Reporting Requirements
Docket No. M-2016-2554787**

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation is the six-year evaluation report of PPL Electric's Universal Service and Energy Conservation Plan. This report is being filed pursuant to the Commission's regulations at 52 Pa. Code § 54.76. As required by § 54.76, PPL Electric retained APPRISE, Inc., an independent, third party research institute from Princeton, NJ to conduct the evaluation and prepare the enclosed report.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed filed on February 26, 2020, which is the date it was deposited with an overnight delivery service.

Those served with this filing include parties copied on the February 28, 2019 Secretarial Letter at the above-referenced docket which, inter alia, moved the date of the instant filing to March 1, 2020.

In addition, please date and timestamp and enclosed extra copy of this letter and return it to me in the envelope provided.

If you have questions regarding the enclosed report, please call me (or Melinda Stumpf, PPL Electric's Manager- Regulatory Programs & Business Services, at (484)634-3297).

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Shafer", is written over a horizontal line.

Michael J. Shafer

Enclosure

**cc: Ms. Grace McGovern, BCS
Mr. Joseph Magee, BCS
Mr. Eric Tuttle, BCS
Ms. Louise Fink Smith, Law Bureau
Certificate of Service**

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SECRETARY'S BUREAU

Applied Public Policy Research
APPRISE
Institute for Study and Evaluation

PPL Electric Utilities
Universal Service Programs
Final Evaluation Report

January 2020

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Executive Summary

PPL Electric Utilities (PPL) implemented Universal Service Programs to help low-income customers maintain electric service and protect customers' health and safety. The programs include the OnTrack¹ program which provides reduced payments and arrearage forgiveness, WRAP which provides energy efficiency and energy education services, CARES which provides outreach and referral services, and Operation HELP which provides emergency assistance. This report presents the results from the 2020 evaluation of PPL's Universal Service Programs.

Introduction

The goals of PPL's Universal Service Programs are as follows.

1. Protect consumers' health and safety by helping low-income customers maintain affordable utility service.
2. Provide affordable utility service by making payment assistance available to low-income customers.
3. Help low-income customers conserve energy and reduce residential utility bills.
4. Operate in a cost-effective and efficient manner.

The objectives of the Evaluation of PPL's Universal Service Programs are as follows.

1. Determine if the programs meet the goals of universal service.
2. Develop standard questions so that utilities evaluate the same criteria.
3. Comply with Commission orders that direct BCS to collaborate with the EDCs and Non-Generating Distribution Companies in developing guidelines for evaluation.
4. Determine if there are adequate linkages between the programs for helping customers to achieve success.

The following evaluation activities were conducted.

1. *Evaluation Planning and Background Research*
2. *Needs Assessment*
3. *Program Database Analysis*
4. *PPL Manager and Staff Interviews*
5. *CBO and Contractor Interviews*
6. *OnTrack Participant Survey*
7. *Billing Data Retrieval and Analysis*

¹The generic term for bill payment assistance programs offered by utilities in Pennsylvania is the Customer Assistance Program (CAP). PPL calls their CAP the OnTrack Program.

OnTrack Program

PPL's OnTrack program provides low-income households with reduced payment amounts and debt forgiveness. The program was first piloted by PPL in 1993 in response to a Public Utility Commission (PUC) Policy Statement that developed guidelines for Customer Assistance Programs. PPL expanded OnTrack in 1999 as part of a 1998 Settlement Agreement, and in 2004 as part of base rate case proceedings. Participation and costs continued to grow at a fast rate, reaching 64,906 participants in December 2019.

PPL's OnTrack expenditures in 2019 were \$56.6 million for CAP credits, \$21.7 million for arrearage forgiveness, and \$3.6 million for administration. Total expenditures in 2019 were over \$82 million.

OnTrack Administration

PPL's OnTrack program is managed by their Program Manager, their Regulatory Program Specialists (RPSs) and a network of seven local agencies strategically located throughout their service territory. The RPSs are responsible for overseeing the OnTrack agencies that work in their regions, including day-to-day interaction with the agencies. The agencies are responsible for working with the customers in program enrollment, follow-up, recertification, and removal. The agencies also provide customers with referrals to other programs and services offered in the community.

OnTrack Eligibility and Benefits

Customers must meet the following requirements to enroll in OnTrack.

- Household income must be at or below 150 percent of poverty.
- The household must have a source of income, or complete a form explaining the income situation.
- The customer cannot own or be listed on multiple properties/multiple PPL accounts, unless their secondary account is for a garage.
- The customer must permanently reside in PPL's service territory.

The benefits of OnTrack participation are as follows.

- A reduced electric payment, based on the household's ability to pay.
- Waived late payment charges.
- Arrearage forgiveness, over a period of 18 months.
- Protection from termination procedures.
- Referrals to other community programs and services.

Payment Plans

PPL designed payment selection guidelines to allow agencies flexibility to choose a payment level that best meets the customer's needs. PPL's customer system calculates two OnTrack payment options at the time of enrollment. Both payment types include an equal monthly payment. The agency caseworker selects the payment type that best fits the customer's ability to pay. The two payment options are structured as follows.

- *Minimum Payment:* The “Minimum Payment” payment plan amount is equal to the estimated monthly budget amount minus the maximum monthly CAP credit, plus a \$5 monthly arrearage co-payment if the customer has pre-program arrearage. The minimum payment amount per month is \$30 for electric heat customers and \$12 for non-electric heat customers. Regardless of payment plan, a customer’s payment may not be lower than these minimum values.
- *Percent of Bill Payment:* This payment is the estimated annual bill times the percent of bill amount, plus a \$5 monthly arrearage co-payment if the customer has pre-program arrearage. The percent of bill varies by poverty level.

In addition to those two calculated amounts, there is an Agency Selected option. This custom amount is set by the agency caseworker if there are extenuating circumstances that the customer is facing. PPL encourages agencies to use the Percent of Bill option.

OnTrack Recertification

The OnTrack program period is 18 months in length and the recertification process begins at month 17. Customers who received LIHEAP funds within the past 16 months or have SSI as a source of income are automatically recertified one time. Their previous financial statement is used for recertification, and the payment amount is reassessed based on their current usage. These customers are only eligible for automatic recertification one time. Customers who do not qualify for automatic recertification are sent a program cover letter and application.

OnTrack Removal

Customers may be removed from OnTrack for the following reasons.

- Missed two consecutive payments.
- Failure to allow access to the meter.
- Failure to comply with WRAP.
- Failure to verify eligibility.
- Voluntary withdrawal.
- No longer a PPL customer.

Operation HELP Program

Operation HELP, founded in 1983, is a hardship fund that is supported by PPL Electric Utilities, its employees, retirees, and its customers. Operation HELP provides grants to low-income customers who have overdue balances and cannot pay their energy bills. Grants are disbursed to administering agencies on a quarterly basis and are available year-round or as long as funds are available.

The objectives of Operation HELP are as follows.

- Provide energy-related financial assistance to qualified low-income families who are having difficulty paying their energy bills.

- Offer energy-related financial assistance to low-income households that are ineligible for LIHEAP.
- Expand the capabilities of CBOs that provide energy-related assistance.
- Administer a year-round program as funding permits.

The projected annual budget for Operation HELP was \$1.4 million for 2014 through 2019. In 2018, 2,454 customers received assistance through Operation HELP.

Operation HELP Administration

PPL and 14 administering agencies (CBOs) have responsibilities with respect to the Operation HELP program. Almost all of the CBOs have been involved with the program since its inception in 1983.

Operation HELP Eligibility Criteria

Customers with limited income and other hardships are eligible for assistance. The eligibility criteria are as follows.

- Annual income at or below 200 percent of the Federal Poverty Level.
- Active PPL account and resides in PPL's service area.
- Grant should resolve the PPL requirement to maintain or restore service.
- Customers can receive assistance once in a calendar year, but CBOs have flexibility to review referrals if customers have compelling and extenuating circumstances. They must discuss extenuating circumstances with PPL's RPSs.
- Operation HELP cannot be used for security deposits, reconnection fees, or charges for insufficient funds.

Operation HELP Benefits

Operation HELP provides services throughout the year. The benefits include the following.

- Direct financial assistance for overdue bills. The assistance can be used for any type of home energy bill – electric, gas, coal, oil, etc.
- The Operation HELP grant is what is needed to maintain service, up to \$750. The customer can also receive up to \$375 in matching credits, so the total can reach \$1,125.
- A payment toward the PPL bill through Operation HELP is eligible to receive matching energy credits on a 2:1 basis. For example, if the payment from the administering organization is \$100, then PPL matches it with another \$50 from company funds, if requested.
- Protection against shutoffs. If PPL has issued a service termination or has already cut an applicant's service and the grant is sufficient to maintain or reconnect service, agencies call PPL's customer service line to restore service or prevent termination.
- Referrals to other programs and services.

CARES Program

CARES is a referral service for customers with temporary hardship such as illness, injury, loss of employment, or high medical bills. This program serves customers who generally meet their payment obligations, but then face a hardship that requires some assistance.

The primary objectives of CARES are as follows.

- Help customers experiencing temporary hardships to manage their overdue electric bills by providing them with information and resources.
- Make tailored referrals to PPL Electric and/or community assistance programs.
- Maintain and/or establish partnerships with community-based organizations to ensure maximum and timely assistance for CARES customers.
- Act as an internal advocate for payment-troubled customers.

The CARES budget was \$54,000 in 2018, and 125 customers received CARES credits that year.

CARES Eligibility and Benefits

Residential customers, regardless of income level, who face a temporary hardship that could result in the loss of electric service, are eligible for CARES.

The benefits of CARES include the following.

- Protection against shutoff of electric service.
- Referrals to other programs and services.
- CARES credits to help pay electric bills for customers who have run out of other options.

WRAP Program

PPL implemented the Winter Relief Assistance Program (WRAP) in 1985 to help reduce electric bills and improve home comfort for low-income customers. The objectives of WRAP are to reduce energy usage and bills of low-income customers and to increase low-income customers' ability to pay their electric bills, resulting in reduced arrearages. The program also aims to improve health, safety, and comfort for low-income occupants; create and maintain partnerships with community-based organizations and contractors; and make referrals to other low-income assistance programs.

The annual WRAP budget was \$10 million in 2017 and 2018. Just under 4,000 customers were served in 2018.

WRAP Administration

PPL's WRAP Manager is responsible for managing the overall program and for internal and regulatory reporting and compliance. She also supports the RPSs and Universal Service Representatives (USRs) and works with RPSs to allocate WRAP funds to each region.

PPL uses contractors to install weatherization measures and conduct audits, inspections, and energy education sessions. Contractors often use sub-contractors for specialized work including electrical, plumbing, and heating equipment repair.

WRAP Eligibility

Customers must meet the following requirements to be eligible for WRAP.

- The household income is at or below 150 percent of the Federal Poverty Level. PPL will serve up to 20 percent of customers that are between 150 and 200 percent of the FPL through its LIURP budget.
- The primary customer is at least 18 years old.
- The customer's home is individually metered.
- The customer's home is a primary home.
- The electric service is in the name of one of the household's occupants, except when the home is part of a multi-unit project and the service is temporarily in the landlord's name.
- The home has not received WRAP in the past three years and has the potential to receive energy-reduction measures and services. PPL staff will consider applicants who received WRAP in the last three years on a case-by-case basis.
- The customer has lived in the home for at least nine months. Exceptions are made to this rule with PPL approval.
- Minimum usage of 6,000 kWh per year. Exceptions can be made for customers in very small premises, hardship situations, or when there is inter-utility coordination.

Renters can receive WRAP services, but the landlord is required to provide written consent before the customer is approved for the program.

WRAP Job Types

There are three types of WRAP services that customers may receive.

1. *Baseload*: Customers with no electric heat will receive this type of service. Measures include LEDs, refrigerator replacement, air conditioner replacement, dryer venting, waterbed replacement, heating filter changing or cleaning, water heater set-back, and other measures that meet the PUC payback criteria.
2. *Low Cost*: In addition to the baseload measures, customers with electric hot water are eligible for water heating measures that meet the PUC's payback criteria.
3. *Full Cost*: Customers are eligible for full cost WRAP if the home has installed electric heat or when full cost measures will reduce electric energy usage. The additional measures for full cost customers include blower-door guided air sealing, insulation, heating repair/retrofit/replacement, cooling system repair and replacement, duct insulation and repair, caulking and weather stripping, and thermostat replacement.

WRAP Energy Education

The goals of energy education are to empower customers to make good energy choices, to involve the customer in the process, and to help the customer understand the electric bill. All WRAP participants receive at least one on-site energy education visit. Additional energy education is offered to customers with greater opportunities for usage reduction.

WRAP Performance

PPL's annual WRAP evaluation for the PUC estimated savings of 10.5 percent for baseload jobs, and 10.4 percent for low cost and full cost jobs in 2017. Many utilities have seen

savings decline significantly over the past several years as many of the highest low-income energy users have already received program services. PPL's savings compare positively to other electric utilities as shown in the Pennsylvania Public Utility Commission, Bureau of Consumer Services' 2018 Report on Universal Service Programs and Collections Performance.²

Needs Assessment

The Needs Assessment provided a profile of low-income households in PPL's service territory using data from the 2015-2017 American Community Survey (ACS). Key findings from this research are summarized below.

- *Service Type:* The majority of households have non-heating electric service. Households in the Lancaster, Lehigh, and Harrisburg regions are more likely than those in other regions to have electric heating service. These customers may be more likely to be served as heating jobs by WRAP.
- *Income Eligibility:* While 17 percent of households are eligible at the 150 percent of poverty level, 26 percent are eligible at the 200 percent level. Households in the Northeast and Susquehanna regions are more likely to be income eligible than households in the other regions.
- *Language:* Approximately 18 percent of income-eligible households speak a language other than English at home, and approximately 12 percent speak Spanish at home. Households in the Lancaster and Lehigh regions are more likely than households in the other regions to speak Spanish at home.
- *Energy Burden:* Energy burden averaged nine percent for electric non-heating households and 13 percent for electric heating households at or below 150 percent of the poverty level. Households in the Lancaster region had lower energy burden than households in the other regions.

OnTrack Participant Feedback

APPRISE conducted a survey with OnTrack participants to assess customers' understanding of OnTrack, the impact of OnTrack, and customer satisfaction with the program. Surveys were conducted with 154 current program participants. Key findings are summarized below.

Demographics

- *Disabled Household Members:* 49 percent of the respondents reported that their household included a member with a disability.
- *Education Level:* 61 percent of respondents reported that the highest level of education reached by any family member was a high school education or less.

² http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf

- **Income Sources:** 68 percent received food stamps or were in public housing; 44 percent received TANF, SSI, SSDI or General Assistance; 41 percent had employment income; and 23 percent had retirement income.
- **Unemployment:** 27 percent reported that they had been unemployed and looking for work over the past 12 months.
- **Household Income:** 54 percent had an annual household income of less than \$20,000.

Reasons for Participation and Enrollment

- **OnTrack Information Source:** Most OnTrack participants learned about the program through a personal contact, a PPL customer service representative, or at an agency.
- **Reason for Enrollment:** OnTrack participants were most likely to report that they had enrolled in the program to reduce their energy bills. Other common responses included having a low or fixed income and reducing arrearages.
- **Enrollment/Recertification Difficulty:** 93 percent said OnTrack enrollment had been very or somewhat easy, and 91 percent of those who recertified said it had been very or somewhat easy.
- **Satisfaction with OnTrack Application Process:** 95 percent said they were very or somewhat satisfied with the OnTrack application process.

Program Understanding, Impact, and Usage

- **OnTrack Understanding:** 94 percent said they felt they had a good understanding of the services provided by OnTrack.
- **OnTrack Benefits:** 97 percent agreed that even monthly payments were a benefit of the program, 96 percent agreed that lower energy bills were a benefit, 86 percent agreed that monthly bill credits were a benefit, and 82 percent agreed that reduced arrearages were a benefit. When asked about the most important benefit, 58 percent said it was lower energy bills and 25 percent said it was the even monthly payments.
- **OnTrack Maximum Benefit:** Respondents were asked several questions about the OnTrack maximum benefit.
 - 51 percent indicated that they were aware of the maximum benefit limit.
 - 42 percent said that they had received a letter from PPL reminding them of the credit limit.
 - Among the participants who received the PPL letter, 70 percent indicated that they had changed how they use energy as result of the information conveyed in the letter.
- **Arrearage Forgiveness:** Awareness of arrearage forgiveness is low, but those who are aware said it made them more likely to pay their bill.

- 27 percent of the respondents reported that they received monthly arrearage credits from OnTrack.
- 88 percent of those who said they received credits said that their arrearage credits made them more likely to pay their electric bill each month.
- Difficulty Paying PPL Bills: OnTrack had a large impact on participants' reported difficulty paying their monthly electric bills and other expenses.
 - While 63 percent said it was very difficult to pay their PPL bills prior to enrolling in OnTrack, only three percent said it was very difficult while participating in OnTrack.
 - While 64 percent said they had to delay or skip paying for food prior to OnTrack, 24 percent said they did so following enrollment.
- LIHEAP Assistance: 48 percent of respondents reported that they applied for LIHEAP, 31 percent reported that they received benefits, and 14 percent reported that they assigned their LIHEAP grant to PPL.
- LIHEAP Application: Respondents who indicated that they had not applied for LIHEAP were asked why they decided not to apply. Most did not know about LIHEAP, forgot about LIHEAP, thought they were ineligible, or did not need assistance.
 - 33 percent said that they did not know or had forgotten about LIHEAP.
 - 22 percent said that their income was too high or that they were ineligible for some other reason.
 - 19 percent said that they did not need the assistance.
 - 10 percent said that they believed they could not participate in LIHEAP and OnTrack at the same time.
 - Some of the participants who thought that they were ineligible for LIHEAP said that they believed LIHEAP did not cover electric heat.
- Importance of OnTrack: 87 percent said that OnTrack had been very important in helping them to meet their needs, and eight percent said it was somewhat important.
- Need for Additional Assistance: 36 percent indicated a need for additional assistance to pay their electric bill. Common types of assistance requested included more bill payment assistance, lowered electricity bills, and more time to pay the bill each month.
- Change in Usage: Participants were asked if their electric usage changed after enrolling in the OnTrack Program.
 - 40 percent said that their usage had decreased.
 - 40 percent reported that their usage had not changed.
 - 6 percent said their usage increased.
 - 13 percent of respondents said that they did not know.

Those who said their usage declined provided the following reasons.

- 65 percent reported that they had made an effort to conserve energy.
- 13 percent reported that they participated in LIURP.

- 10 percent said that they had fewer people or spent less time in the home.

Program Satisfaction

- Overall Satisfaction with OnTrack: 90 percent were very satisfied with OnTrack and 10 percent were somewhat satisfied.
- Best Method of Contact about OnTrack: 31 percent of respondents prefer a letter in the mail, 26 percent would like to receive a phone call from a live PPL representative, and 16 percent would prefer a phone call from PPL with a pre-recorded message. Other common responses included email and text messages.
- Participant Comments and Recommendations: Respondents were given the opportunity to provide additional comments or recommendations for the OnTrack Program. While most of the participants chose not to comment, the most common responses were that PPL should improve their communication with participants, expand outreach for the program, increase the program benefits, and make the application process easier.

Program Impact

This section of the report provides an analysis of the impacts of OnTrack. OnTrack participants received credits that resulted in increased affordability, more regular payments, greater bill coverage rates, and reduced collections actions and costs. We also analyzed the percent of customers who reached the maximum credit and the number of months that it took for those customers to reach the maximum credit.

OnTrack Participation and Credits

- Full Year Participants: 46 percent of all customers who participated in OnTrack in 2018 were in OnTrack for the full year. Within the Treatment Group, 78 percent were in OnTrack for the full year following their 2017-2018 enrollment. A smaller percentage, 25 percent of All 2018 Participants and 35 percent of the Treatment Group received 12 months' worth of OnTrack credits.
- OnTrack Credits: All 2018 Electric Non-Heating participants received an average of eight credits in 2018 and the full year participants received an average of 9.8 credits. Full year Electric Non-Heating participants received an average of \$684 in credits. Full year Electric Heating participants received an average of \$1,166 in credits.
- Mean Percent Discount: Both Electric Non-Heating and Electric Heating 2017-2018 enrollees who remained in OnTrack for the full year received a mean discount of about 40 percent, and those who received all of the credits received a mean discount of about 50 percent. Customers with household income at or below 50 percent of the poverty level received an average discount of 59 percent.

Affordability Impacts

- Energy Burden: The Electric Non-Heating Treatment Group received an average OnTrack credit of \$731, which reduced their mean energy burden from 13 percent to

seven percent. The Electric Heating Treatment Group received an average OnTrack credit of \$1,054 which reduced their mean energy burden from 17 percent to ten percent.

- **PUC Targeted Burden:** The Pennsylvania Public Utility Commission (PUC) has specified targeted energy burden levels for customers who participate in Customer Assistance Programs (CAP). However, the PUC also has specified cost control measures that may prevent customers who reach maximum discount levels or who have minimum payment levels from reaching these affordability targets.

A large percentage of customers still had an energy burden above the PUC target in the year following OnTrack enrollment, especially those with income at or below 50 percent of the poverty level. While 76 percent of Non-Electric Heating customers with income at or below 50 percent of poverty had a burden that exceeded the PUC target, 47 percent of Electric Heating participants at or below 50 percent of poverty had a burden that exceeded the PUC target.

Payment Impacts

- **Number of Payments:** Electric Non-Heating participants increased the number of cash payments made from 8.2 in the year prior to OnTrack participation to 10.1 in the year following participation, and Electric Heating participants increased the number of cash payments made from an average of 8.5 in the year prior to OnTrack participation to 9.9 in the year following OnTrack enrollment.
- **Total Coverage Rate:** Electric Non-Heating Participants increased their total coverage rate (the percent of the bill covered by cash and assistance payments) from 84 percent in the year prior to OnTrack enrollment to 98 percent in the year following enrollment. Electric Heating participants increased their total coverage rate from 83 percent in the year prior to OnTrack enrollment to 104 percent in the year following enrollment.
- **Balance:** Electric Non-Heating Participants reduced their balance by \$454 as compared to the comparison groups. Electric Heating participants reduced their balance by \$642 as compared to the comparison groups.
- **LIHEAP:** While 32 percent of Electric Heating customers received LIHEAP assistance in the pre-enrollment year, 31 percent received LIHEAP in the year following OnTrack enrollment.

Arrearage Forgiveness

- **Arrearage Forgiveness Received:** Among those 2018 participants with arrearages, more than 99 percent received forgiveness and the mean amount received was \$365. Customers in the Treatment Group who participated in OnTrack for the full year and had arrearages received an average of 10.6 arrearage forgiveness payments totaling an average of \$568.

Collections Impacts

- **Collections Actions:** Customers experienced a reduction in the number of calls/messages/reminders, notices, payment agreements, and terminations following enrollment in OnTrack.
- **Collections Costs:** Collections costs for OnTrack participants declined from an average of \$254 in the year prior to enrollment to \$164 in the year following enrollment. The comparison groups increased their collections costs, so the net change was a reduction of \$118 in collections costs.

Maximum Credits

- **Maximum OnTrack Credit:** Of those with at least 16 months of data following enrollment or recertification, 28 percent of Non-Electric Heating customers and three percent of Electric Heating customers reached the maximum OnTrack credit. The percentage would be higher if enough data were available to show the analysis in the 17th and 18th month.

Customers at or below 50 percent of the poverty level were most likely to reach the maximum credit. Almost half of the Non-Electric Heating customers with income at or below 50 percent of the poverty level reached the maximum credit, compared to seven percent of the Electric Heating customers at this income level.

OnTrack Findings and Recommendations

Key findings with respect to OnTrack are as follows.

1. OnTrack has positive impacts for participants. Following OnTrack enrollment, customers increased the number of cash payments made, bill coverage rates improved, energy burden declined, and customers had reduced collections actions and costs. The OnTrack participant survey showed that customers felt their bill was much less difficult to pay, they were much less likely to have problems meeting their other needs, and most participants reported that OnTrack had been very important in helping them to meet their needs.
2. The OnTrack participant survey showed that 51 percent of participants were aware of the OnTrack credit limit and 42 percent reported that they received a letter from PPL about the limit. Of those who were aware of the letter, 70 percent reported that they changed their usage in response.
3. When asked to assess OnTrack, all agencies responded that PPL is very responsive and that the program is working well. All agencies also reported that clients are generally happy with OnTrack.
4. Customers indicated low levels of difficulty with application and recertification, and high satisfaction with the program. While 93 percent reported that enrollment was very easy or somewhat easy, 91 percent reported that recertification was very easy or

somewhat easy. Ninety percent said they were very satisfied with OnTrack and ten percent said they were somewhat satisfied.

5. OnTrack provides many referrals to customers to help them meet additional needs. All agencies reported that they provide customers with referrals to other programs when they discuss their OnTrack application. The most common referrals are to LIHEAP and WRAP, but many other types of referrals and information are also provided.
6. Many improvements have been made to OnTrack since the last Universal Service Program Evaluation.
 - Online Application – PPL introduced an online application which has received positive reviews from PPL staff, agency staff, and customers. Ten percent of current PPL customers reported that they applied for OnTrack online, and this percentage is likely to increase over time, as some of the current OnTrack participants enrolled before the online application was introduced.
 - Payment Troubled Definition – PPL removed the requirement that customers must have defaulted on a payment agreement in the past 12 months to be eligible for OnTrack. This has reduced barriers to OnTrack enrollment and opened up the program to customers who are challenged by their bill even if they have not defaulted on a payment agreement.
 - Alternative Suppliers – The previous evaluation found that the majority of OnTrack participants used Alternate Suppliers and they paid higher prices than those who did not. Additionally, the use of Alternate Suppliers led to a higher OnTrack credit as compared to OnTrack participants who did not use Alternate Suppliers. Many OnTrack participants were not aware that they had an Alternate Supplier or that their costs were higher than the price to compare.

OnTrack participants are now only permitted to select from suppliers that offer rates lower than PPL's price to compare. Customers are no longer working with suppliers because no suppliers are offering such a rate.

OnTrack recommendations are made with respect to program design, outreach and enrollment, and customer bills.

OnTrack Design Recommendations

1. Review the maximum credit levels, especially for Non-Electric Heating customers with income at or below 50 percent of the poverty level, and consider an increase in the amount.

PPL revised their maximum credit to allow for higher credits for lower poverty level group participants. However, the evaluation found that overall 28 percent of Non-Electric Heating customers and three percent of Electric Heating customers reached the maximum OnTrack credit. (Only 16 months of data were available, and the percentage

would be higher if enough data were available to show the analysis in the 17th and 18th month). Customers at or below 50 percent of the poverty level were most likely to reach the maximum credit. Almost half of the Non-Electric Heating customers with income at or below 50 percent of the poverty level reached the maximum credit, compared to seven percent of the Electric Heating customers at this income level.

2. Review payment calculations to reduce the percentage of customers who reach the maximum credit.

Given the large percentage of customers who exceed the maximum credit, some fewer than ten months into the 18-month program, and many by a significant amount, PPL should reassess how the payment is calculated with the goal of reducing this issue. An additional option is to adjust the customer's payment periodically if it appeared that the customer would be exceeding the credit limit. The system could automatically change the payment amount and send a letter to the customer.

3. Address defacto heating customers.

The maximum credit overage is much more prevalent in the Electric Non-Heating customers. This may be due to the fact that some of these customers are using defacto electric heating. PPL should assess the usage patterns of high-usage electric heating customers, and try to coordinate with the gas company and/or WAP to assist these customers with their gas heating systems if needed.

4. Reassess the OnTrack Budget Billing (OTBB) payment.

OnTrack customers who reach their maximum credit are transitioned to OTBB and are often unable to pay the much higher budget billing amount. They are charged the budget bill even if it is higher than their actual usage until their arrearages are paid off. A possible solution is to give these customers the option of paying the lower of their budget bill or actual usage amount.

5. Review energy burdens that result from the OnTrack payment plans, and consider revisions to the calculations.

The evaluation found that a large percentage of OnTrack participants still had an energy burden above the PUC target in the year following OnTrack enrollment, especially those with income at or below 50 percent of the poverty level. While 76 percent of Non-Electric Heating customers with income at or below 50 percent of poverty had a burden that exceeded the PUC target, 47 percent of Electric Heating participants at or below 50 percent of poverty had a burden that exceeded the PUC target. Part of the overage is due to the maximum credit, but it also is due to the payment calculation.

6. Reassess the OnTrack program length.

PPL moved to an 18-month OnTrack program with the most recent Universal Service Plan. This is confusing for PPL staff, agencies, and participants, as it is usual to think about a one-year period, both in terms of reaching the maximum credit and in terms of the timeline for recertification. Moving to a 12-month or 24-month program cycle would reduce confusion.

7. Review customers' accounts at the time of recertification and advise customers who have not received LIHEAP to apply.

One agency reported that at the time of recertification they review the customer's usage over the last 18 months and check if electric heating customers have applied to LIHEAP. If the customer has not applied to LIHEAP and the agency is able to speak with the customer at the time of recertification, they will advise the customer to apply for the program. PPL should institutionalize this process so it is done regularly by PPL staff or agency staff. This would increase the percentage of customers who receive LIHEAP.

Outreach and Enrollment Recommendations

1. Improve documentation of OnTrack guidelines.

Three of the seven OnTrack agencies reported that the OnTrack application instructions should be improved. The application should clearly state why the income documentation is necessary, how the income documentation can be provided, and what exactly is required. The application should also clearly state that customers should list all household members, including themselves and non-income earning members, on the application.

2. Provide the printed OnTrack application in Spanish.

The Needs Assessment found that approximately 12 percent of income-eligible households in PPL's service territory speak Spanish at home and 24 percent speak Spanish at home in the Lehigh region. Agency staff also reported that they encounter many households whose primary language is Spanish. (Note that the PPL website is available in Spanish. A customer can read about the programs and apply online in Spanish.)

3. Assist agencies with income calculation.

PPL staff reported that they find mistakes in agency calculations of the customers' annual income. PPL should provide clear instructions for this calculation. Additionally, a simple Excel formula that calculates the annual income and poverty level when the caseworkers input the customer's paycheck amount and the frequency of payment could improve accuracy.

4. Provide OnTrack brochures to the agencies.

Three agencies reported that the OnTrack brochure does a good job of explaining the program, and three agencies were not familiar with the brochure. PPL should have brochures available at the agencies.

5. Require better zero-income documentation.

PPL staff and agencies expressed concern over zero-income customers and the lack of documentation that is required. The current zero-income form only asks four or five questions and does not require notarization. It is currently less burdensome for customers to report zero income than to provide proof of earned income. Customers who are claiming zero income should be required to provide additional information on their source of support and signed documentation from the individual providing that support.

6. Provide follow-up education about OnTrack for customers who apply online or over the telephone with PPL representatives.

Customers who apply for OnTrack online or over the phone with PPL representatives do not receive in-depth education about the OnTrack program and referrals to other services. PPL should provide a list of these customers to the agencies and require the agencies to hold onboarding meetings or calls with customers following OnTrack enrollment. This will allow agency staff to personally explain the program to the customer and improve understanding of OnTrack requirements and benefits, as well as other assistance that may be available.

7. Rework the maximum credit letters and provide additional education about the maximum credit during OnTrack enrollment.

Agencies reported that customers are confused by the maximum credit letters and by the maximum credit. PPL should provide OnTrack participants with more information on the maximum credit and how their usage affects their benefits, both at the time of enrollment and in these letters.

8. Enhance OnTrack training for call center staff.

Agencies reported that call center staff often provide inaccurate or incomplete information about OnTrack. PPL should consider additional training for these staff.

9. Provide increased coordination of OnTrack with other Universal Service Programs through one online application for all Universal Service programs.

PPL and agency staff reported that it would be beneficial to have greater coordination between the Universal Service Programs and an online application for Operation HELP in the same system. Customers could fill out one application for assistance that would allow PPL to determine which program(s) would benefit the customer. This would

simplify the application process for the customer. Currently, only WRAP and OnTrack have online applications.

10. Increase LIHEAP Outreach to OnTrack participants.

While 32 percent of Electric Heating customers received LIHEAP assistance in the pre-enrollment year, 31 percent received LIHEAP in the year following OnTrack enrollment. PPL should conduct outreach to OnTrack participants about LIHEAP each season.

Customer Bill Recommendations

1. Include the arrearage forgiveness amount on the customer's bill.

While the impact analysis showed that 77 percent of all 2018 OnTrack participants received arrearage forgiveness, only 27 percent reported that they received arrearage forgiveness and only eight percent were able to estimate the monthly amount.

PPL should consider adding information to the customer's bill that shows the amount of arrears that are forgiven each month. This is important because 88 percent of customers who were aware that they received arrearage forgiveness said that the forgiveness made them more likely to pay their electric bill.

2. Provide visual information on the OnTrack bill on the percent of the maximum credit that has been used to date.

This information may make it clearer to customers when they are in danger of exceeding their maximum OnTrack credit prior to the re-certification date. Agency caseworkers reported that many customers did not appear to understand what the warning letters meant, and such communication may increase customer understanding.

Operation HELP Findings and Recommendations

Key findings with respect to Operation HELP are as follows.

1. Operation HELP is an important program that provides emergency assistance to customers who have faced a hardship.
2. Agency caseworkers reported that the Operation HELP guidelines are clear and easy to understand. All ten agencies reported that there are no barriers to application for Operation HELP.
3. Agency caseworkers reported that they provide important services to customers at the time of Operation HELP application. All agencies provide some information about energy conservation to the client at the time of Operation HELP application. This information includes referrals, energy conservations tips, energy kits, and materials about energy conservation. Nine agencies provide customers with referrals at the time of Operation HELP application.

Recommendations for Operation HELP are as follows.

1. Provide additional training and documentation on Operation HELP to agencies.

Agencies varied in how they determined if a customer is eligible for the program. Individual agency requirements included a good payment history, demonstration of hardship, or not being shut off (this may be a misunderstanding of program requirements). Only one agency reported that they use the customer's payment history to determine if the customer is eligible for a grant. Another agency reported that they assess whether the customer is truly in a hardship situation to determine if the customer will receive the grant. One agency reported that PPL does not permit agencies to provide Operation HELP grants to customers who have been terminated. Further, agencies are inconsistent in the documentation they require of program applicants and whether customers are required to visit the agency to apply for assistance.

While PPL managers and staff reported that they have difficulty awarding all available Operation HELP funding, agencies reported that they ran out of funding or restricted grants due to a lack of funding. It appears that PPL can work with agencies to distribute additional available grant dollars to customers in need of assistance. PPL should provide guidelines to agencies about use of funds and direct them to request additional funds when their program funds are depleted.

Seven agencies reported that they can provide grants for multiple energy vendors, while three agencies reported that they are not able to do so. PPL should clarify these program guidelines with Operation HELP agencies.

2. Train agencies to coordinate Operation HELP with OnTrack.

One agency reported that staff will automatically process an Operation HELP application for OnTrack applicants above the OnTrack income guidelines. PPL should educate all agencies about this process.

3. Retrain Operation HELP caseworkers about PPL portal access and create a direct phone line to PPL for agency Operation HELP caseworkers.

Several agencies reported that they have had challenges reaching a PPL customer service representative to request assistance with Operation HELP. Agencies also reported that customer service representatives at PPL often do not know how to assist them with Operation HELP issues and that they often must wait on hold for up to ten minutes to reach a representative.

PPL should consider implementing a direct phone line for agency staff or have Operation HELP questions be directed to Universal Service Program staff. They should also re-train staff that they have direct access to PPL's portal and may not need assistance from PPL for many of their questions.

4. Train PPL customer service representatives on Operation HELP guidelines.

Agencies reported that staff do not understand the program or that they refer ineligible customers to Operation HELP.

CARES Findings and Recommendations

CARES is working well and providing important benefits to participants. One recommendation for the program is provided below.

1. Encourage caseworkers to refer customers to CARES.

Caseworkers prioritize referrals to OnTrack, so many CARES-eligible customers are not referred to the program. If a customer is potentially eligible for both programs, the customer could be given a hold under CARES while applying to OnTrack. If the customer is unable to enroll in OnTrack, the customer could then receive a CARES credit if eligible.

WRAP Findings and Recommendations

Key WRAP findings are summarized below.

1. WRAP has continued to achieve good energy savings. PPL's annual WRAP evaluation for the PUC estimated savings of 10.5 percent for baseload jobs, and 10.4 percent for low cost and full cost jobs in 2017. Many utilities have seen savings decline significantly over the past several years as many of the highest low-income energy users have already received program services. PPL's savings compare positively to other electric utilities as shown in the Pennsylvania Public Utility Commission, Bureau of Consumer Services' 2018 Report on Universal Service Programs and Collections Performance.³
2. Health and safety is an important component of WRAP. The analysis showed that 72 percent of baseload jobs, 82 percent of low cost jobs, and 68 percent of full cost jobs received health and safety measures.
3. PPL has maintained a diverse group of skilled nonprofits and contractors to implement their WRAP. Based on comparisons with other research conducted on low-income energy efficiency programs, this system appears to provide higher energy savings than using one contractor to implement the full program.
4. PPL contractors acknowledge the dedication of PPL staff to WRAP. All organizations reported that PPL has been helpful in WRAP implementation, that PPL provides adequate support for the program, and that PPL staff members are available to answer questions. One contractor even reported that the PPL contact shifts her workday in the summer to accommodate the contractor's earlier work hours.

³ http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf

5. PPL has made useful improvements to the WRAP data system. All ten organizations reported that PPL's data system works well, and many noted that it has improved since the last version.

Recommendations for WRAP are as follows.

1. Continue to work on increasing coordination with other low-income energy efficiency programs.

Several of the service delivery organizations provide additional utility programs and/or WAP and felt that there are opportunities for improved coordination. PPL should assess how they can be more flexible in the timing of service delivery, such as prioritizing WAP jobs or allowing additional time for customers to be treated by WRAP until they are ready to be served by WAP. Additionally, they could consider providing incentives to organizations to increase coordinated jobs.

2. Provide education for automatically enrolled OnTrack customers.

Since the implementation of automatic enrollment in WRAP for high-usage OnTrack customers, some of the automatically enrolled WRAP participants have been confused about the program. One service delivery organization reported that they are having issues with customers, particularly OnTrack customers, not responding or not knowing what WRAP is when staff call. Additionally, one organization noted that OnTrack customers who are automatically enrolled in WRAP may have been notified of their enrollment without fully understanding what the program is. This indicates that there is room for improvement in how OnTrack customers are educated about WRAP.

3. Adhere to process for including self-addressed, stamped envelope in requests for landlord consent.

These envelopes were traditionally included in the consent requests. Recently, the envelopes have not been included, which has resulted in a lower number of landlord consents.

4. Update the WRAP online system per PPL requests to improve system efficiency.

- Add the ability to re-open a WRAP case in the online system instead of having to recreate a case record.
- Create the ability for PPL staff to query all database fields.
- Make the job closing date the installation date of the final measure and list the inspection date separately. Currently, the job closing date is the inspection date.

5. Return to seven-year WRAP stay-out provision.

PPL previously had a seven-year stay-out provision before customers could receive WRAP services again. In their most recent Universal Service Plan, PPL reduced the stay-out to only three years. This will result in lower WRAP savings, as most customers will not have good energy savings opportunities in such a short time following previous WRAP treatment. A seven-year stay-out provision will provide greater benefits to WRAP participants.

I. Introduction

PPL Electric Utilities (PPL) implemented Universal Service Programs to help low-income customers maintain electric service and protect customers' health and safety. The programs include the OnTrack⁴ program which provides reduced payments and arrearage forgiveness, WRAP which provides energy efficiency and energy education services, CARES which provides outreach and referral services, and Operation HELP which provides emergency assistance. This report presents the results from the 2020 evaluation of PPL's Universal Service Programs.

A. Evaluation

The goals of PPL's Universal Service Programs are as follows.

1. Protect consumers' health and safety by helping low-income customers maintain affordable utility service.
2. Provide affordable utility service by making payment assistance available to low-income customers.
3. Help low-income customers conserve energy and reduce residential utility bills.
4. Operate in a cost-effective and efficient manner.

The objectives of the Evaluation of PPL's Universal Service Programs are as follows.

1. Determine if the programs meet the goals of universal service.
2. Develop standard questions so that utilities evaluate the same criteria.
3. Comply with Commission orders that direct BCS to collaborate with the EDCs and Non-Generating Distribution Companies in developing guidelines for evaluation.
4. Determine if there are adequate linkages between the programs for helping customers to achieve success.

The evaluation addresses the following questions.

1. Is the appropriate population being served?

The evaluation examined program participation rates by poverty group and demographic group. This analysis showed that the appropriate population is being served by PPL's Universal Service Programs.

⁴The generic term for bill payment assistance programs offered by utilities in Pennsylvania is the Customer Assistance Program (CAP). PPL calls their CAP the OnTrack Program.

2. *How many customers in PPL's service territory are eligible for the Universal Service Programs?*

We analyzed American Community Survey data (a publicly available dataset) to provide information on the number, characteristics, and needs of households in PPL's service territory that are eligible for the Universal Service Programs.

3. *What is the customer distribution for each program by poverty guidelines?*

We analyzed the distribution of poverty levels for customers who have participated in OnTrack. This analysis showed that customers with the greatest need are participating and receiving the greatest benefits.

4. *What are the barriers to program participation?*

We reviewed all documents associated with PPL's programs and conducted on-site interviews with PPL program managers and staff. We conducted telephone interviews with community-based organizations (CBOs) and contractors. We conducted surveys with OnTrack participants.

We found that agency staff and customers do not feel that the application process is difficult and that it does not pose a barrier to participation.

5. *Is PPL adequately addressing any program participation barriers?*

PPL removed one barrier to OnTrack participation that was a broken payment agreement. This is no longer a participation requirement. Additionally, PPL implemented an online application process that improved access to OnTrack.

6. *What is the distribution of customers by OnTrack payment plan? Do participants' energy burdens comply with the CAP Policy Statement? How many and what percentage of customers have a minimum payment?*

We analyzed the PPL program database and billing data and interviewed staff to answer these questions. Customers are most likely to have a Percent of Bill Payment. Approximately six percent of Non-Electric Heating participants and 13 percent of Electric Heating participants have the minimum payment.

7. *What are the barriers to program re-certification?*

We reviewed documents associated with OnTrack, conducted on-site interviews with OnTrack managers and staff, and conducted telephone interviews with agency caseworkers. We also conducted interviews with current OnTrack participants. This research showed that both agency staff and participants felt that re-certification was not difficult and that there were not barriers to this process.

8. *Is PPL adequately addressing any re-certification barriers?*

The research did not find that there were barriers to re-certification.

9. *What are the OnTrack retention rates? Why do customers leave OnTrack?*

The OnTrack analysis showed that 78 percent of the customers who enrolled in OnTrack from 2017 to 2018 remained on the program for a full year. Customers leave OnTrack because they reach their maximum credit and ask to be removed after being transferred to OnTrack Budget Billing, they do not recertify as required, or they ask to be removed from the program.

10. *Is there an effective link between OnTrack and energy assistance programs?*

We analyzed the coordination and linkages between OnTrack, WRAP, CARES, Operation HELP, and LIHEAP through on-site interviews with program managers and staff, and through interviews with CBOs and contractors. We found that these linkages are effective.

- OnTrack enrollees are referred to WRAP.
- WRAP participants are referred to OnTrack.
- Operation HELP and CARES participants are referred to OnTrack and WRAP.

PPL can improve outreach to OnTrack participants about LIHEAP and work to further coordinate WRAP with WAP and other utility efficiency programs.

11. *How effective are OnTrack control features at limiting program costs?*

OnTrack has the following cost control features.

- 18-month maximum CAP credits. Participants were likely to report that they were aware of these maximums and that they changed their usage as a result of these limits.
- Minimum payment amounts.
- Increased payments at the time of OnTrack re-certification if appropriate.

These mechanisms are effective at controlling OnTrack costs. However, there is a concern that too many OnTrack participants are impacted by the maximum credit and PPL should re-examine these limits.

12. *How effective is the OnTrack / WRAP link?*

We reviewed the design of these two programs through document review and on-site PPL interviews, with an emphasis on the coordination and linkages between these programs. We found that the following linkages are effective.

- WRAP participants are referred to OnTrack.
- PPL is always assessing new methods to increase these linkages.

13. *Does OnTrack improve payment behaviors?*

The impact analysis showed that OnTrack improved payment behavior. Participants increased the number of cash payments and increased their total coverage rates (percent of bill that was paid through customer and assistance payments) in the year following OnTrack enrollment.

14. Does participation in Universal Service Programs reduce arrearages?

Participation in Universal Service Programs reduces arrearages. The 2017 to 2018 OnTrack enrollees who participated in OnTrack for the full year and had arrearages received an average of 10.6 arrearage forgiveness payments totaling an average of \$568 in forgiveness.

15. Does participation in Universal Service Programs reduce service terminations?

Participation in OnTrack reduced service terminations. While 15 percent of the 2017-2018 OnTrack enrollees were terminated in the year prior to enrollment, seven percent were terminated in the year following enrollment. Both comparison groups had an increase in service terminations, so the net change was a reduction of ten percentage points.

16. Does participation in Universal Service Programs decrease collections costs?

Mean collection costs declined for OnTrack participants. While costs averaged \$254 per participant in the year preceding enrollment, costs averaged \$164 in the year following enrollment.

17. How can Universal Service Programs be more cost-effective and efficient?

Based on our review of program documents, interviews with program managers and staff, interviews with program participants and nonparticipants, and analysis of participant and nonparticipant data, we made several key recommendations to make the programs more cost-effective and efficient. These recommendations are included in the Findings and Recommendations section.

The following evaluation activities were implemented.

- 1. Evaluation Planning and Background Research:* APPRISE collected and reviewed documents related to the PPL Universal Service Programs.
- 2. Needs Assessment:* APPRISE conducted analysis of American Community Survey data to provide information on the number, characteristics, and needs of households in PPL's service territory that are eligible for the Universal Service Programs.
- 3. Program Database Analysis:* APPRISE collected and analyzed information from OnTrack, WRAP, CARES, and Operation HELP program databases.
- 4. PPL Manager and Staff Interviews:* APPRISE conducted on-site interviews with PPL's managers and staff that run PPL's Universal Service Programs.
- 5. CBO and Contractor Interviews:* APPRISE conducted telephone interviews with staff at the seven CBOs who administer OnTrack, with ten WRAP providers, and with ten CBOs that administer Operation HELP.
- 6. OnTrack Participant Survey:* APPRISE conducted telephone surveys with 154 current OnTrack participants.

- 7) *Billing Data Retrieval and Analysis*: APPRISE obtained data from PPL for customers who participated in OnTrack and a sample of low-income customers who have not participated. We analyzed the impact of OnTrack on affordability, bill payment behavior, arrearages, and service terminations.

B. Organization of the Report

Eight sections follow this introduction.

- 1) *Section II – OnTrack Program*: Provides a detailed description of the OnTrack Program.
- 2) *Section III – Operation HELP Program*: Provides a detailed description of the Operation HELP Program.
- 3) *Section IV – CARES Program*: Provides a detailed description of the CARES Program.
- 4) *Section V – Winter Relief Assistance Program*: Provides a detailed description of the Winter Relief Assistance Program.
- 5) *Section VI – Needs Assessment*: Provides a summary of the findings from the American Community Survey analyses.
- 6) *Section VII – OnTrack Customer Feedback*: Provides a summary of the findings from the telephone surveys with OnTrack participants.
- 7) *Section VIII – Impact Analysis*: Provides a description of the methodology and findings from the analysis of OnTrack impacts.
- 8) *Section IX – Summary of Findings and Recommendations*: Provides a summary of the findings and recommendations from all of the evaluation activities.

APPRISE prepared this report under contract to PPL. PPL facilitated this research by furnishing program data to APPRISE. Any errors or omissions in this report are the responsibility of APPRISE. Further, the statements, findings, conclusions, and recommendations are solely those of analysts from APPRISE and do not necessarily reflect the views of PPL.

II. OnTrack Program

PPL's OnTrack program provides payment-troubled low-income households with reduced payments and debt forgiveness. The program was first piloted by PPL in 1993 in response to a Public Utility Commission (PUC) Policy Statement that developed guidelines for Customer Assistance Programs. PPL expanded OnTrack in 1999 as part of a 1998 Settlement Agreement, and in 2004 as part of base rate case proceedings.

This section describes PPL's OnTrack program. The information in this section of the report was obtained from review of PPL's program documents and procedures manuals, discussion with PPL managers and staff, and in-depth interviews with staff at the seven OnTrack agencies.

A. Goals and Resources

PPL has developed several objectives for OnTrack.

Key Objectives

- Administer a cost-effective program.
- Provide expanded services to low-income households.
- Identify for enrollment those customers who meet OnTrack guidelines.
- Adhere to all PUC reporting requirements and policies.
- Identify and implement improvements to strengthen the effectiveness of OnTrack.

Primary Operating Objectives

- Improve customers' bill payment habits and attitudes.
- Stabilize or reduce customers' energy usage.
- Eliminate overdue balances for program participants.
- Provide the customer with other beneficial services and/or programs through a network of local community-based organizations (CBOs or agencies).

Other Objectives

- Matching the proper assistance program with each potential applicant.

PPL's OnTrack budget has increased substantially since 1999. Table II-1 shows that the OnTrack budget was under \$6 million in 1999, increased to nearly \$19 million in 2006, increased to \$46 million in 2011, and increased to \$106 million in 2017. The annual program budget for 2019 was \$129 million.

**Table II-1
OnTrack Annual Budget and Projected Participation**

	2020	2021	2022	2023	2024
OnTrack Budget (\$Millions)	\$82.86	\$84.56	\$85.42	\$86.02	\$86.49
Projected Participation	64,592	65,651	66,030	66,873	67,234

B. Operations

PPL's OnTrack is managed through a combination of internal resources, contractors, and a network of seven CBOs.

Internal Resources

PPL has a Manager of Regulatory Programs and Business Services who is responsible for the oversight of all of the Universal Service and Energy Conservation Programs. Her responsibilities include the following.

- Managing state-wide leadership in the area of commission regulations and programs.
- Being accountable for the performance and results of implementing low-income programs.
- Ensuring compliance with PUC regulations and reporting requirements.
- Serving as the primary liaison between the PPL Electric Utilities, state policy makers, and regulators regarding low-income programs and PUC regulations
- Managing the budget, staffing, operations, and management controls for OnTrack, WRAP, Operation HELP, CARES and LIHEAP.
- Directing goal setting efforts and the strategic vision for all low-income programs.

PPL has an OnTrack Program Manager who is responsible for the program. Her responsibilities include the following.

- Designing and implementing OnTrack.
- Creating program strategy.
- Developing operational and financial plans.
- Preparing communications.
- Coordinating external and internal resources.
- Responding to PUC requests.
- Program reporting.
- Overseeing procedural changes and communicating changes to the agencies.
- Monitoring OnTrack enrollment levels and other Key Performance Indicators.
- Monitoring the annual OnTrack budget and expenses.

PPL also has four Regulatory Program Specialists (RPSs) who are responsible for overseeing the agencies in their regions, including all day-to-day interactions. Their responsibilities include the following.

- Agency contract negotiations.
- Review of agency invoices.
- Audits of agency OnTrack administration.

- Resolving day-to-day problems with the agencies.
- Resolving customer issues.

Other internal resources include Universal Service Representatives (USRs), a Vendor Support Manager, administrative employees, training staff, customer services supervisors, and analysts, who provide support for the program as needed.

Contractors

Contracted call centers handle most types of OnTrack-related phone calls, including the daily/weekly account-level work that takes place after a customer contacts PPL. In 2018, call centers began processing OnTrack applications over the phone, which has increased the number of calls they receive. Other contractors are used to execute special projects, such as targeted outreach, phone enrollment, and customer education.

Community-Based Organizations

The agencies are responsible for OnTrack enrollment, follow-up, recertification, and removal. Agency responsibilities include the following.

- Screening and enrolling customers.
- Setting up the OnTrack payment plans.
- Communicating program responsibilities and guidelines to the customers.
- Recertifying customers.
- Documenting customers' changes in household circumstances and updating the OnTrack payment when impacted by those changes.

Agency staff were asked about the ability to communicate with clients in languages other than English.

- Four agencies have at least one staff member who can communicate with clients in Spanish.
- Three of these agencies specifically noted that these staff are involved in OnTrack intake.
- Three agencies with Spanish-speaking staff, and one without Spanish-speaking staff, have access to a language line service, which allows them to communicate with customers in various languages.

C. Eligibility and Benefits

This section provides information on the OnTrack eligibility criteria and program benefits.

Eligibility Criteria

Customers must meet the following requirements to enroll in OnTrack.

- Household income must be at or below 150 percent of the Federal Poverty Level (FPL).
- The household must have a source of income, or complete a form explaining the income situation. Unearned income in the form of government or other public assistance, money from friends or relatives, or other one-time lump-sum payments must be reported in a

self-declaration statement submitted with the application. The statement does not need to be notarized.

- The customer cannot own or be listed on multiple properties/multiple PPL accounts, unless their secondary account is for a garage.
- The customer must permanently reside in PPL's service territory.

Program Benefits

The benefits of OnTrack participation are described below.

- A reduced electric payment, based on the household's ability to pay.
- Waived late payment charges.
- Arrearage forgiveness, over a period of 18 months.
- Protection from termination procedures.
- Referrals to other community programs and services.

Payment Plans

PPL designed payment selection guidelines to allow agencies flexibility to choose a payment level that best meets the customer's needs. PPL's customer system calculates two OnTrack payment options at the time of enrollment. Both payment types include an equal monthly payment. The agency caseworker selects the payment type that best fits the customer's ability to pay. The two payment options are structured as follows.

- *Minimum Payment:* The "Minimum Payment" payment plan amount is equal to the estimated monthly budget amount minus the maximum monthly CAP credit, plus a \$5 monthly arrearage co-payment if the customer has pre-program arrearage. The minimum payment amount per month is \$30 for electric heat customers and \$12 for non-electric heat customers. Regardless of payment plan, a customer's payment may not be lower than these minimum values.

The table below displays the maximum credits for the 18-month cycle based on FPL and account type. These maximum credits were introduced upon final approval of the 2017-2019 Universal Service Plan (USP).

**Table II-2
Maximum Credit, By Household Income and Account Classification**

Federal Poverty Level	Maximum Credit (18-Month Period)	
	Non-Electric Heating	Electric Heating
0% - 50%	\$1,585	\$4,027
51% - 100%	\$1,441	\$3,661
101% - 150%	\$1,310	\$3,328

- *Percent of Bill Payment:* This payment is the estimated annual bill times the percent of bill amount, plus a \$5 monthly arrearage co-payment if the customer has pre-program arrearage. The percent of bill varies by poverty level as shown in the table below.

**Table II-3
Percent of Bill Payment, By Household Income**

Federal Poverty Level	Percent of Bill Payment
0% - 50%	50%
51% - 100%	70%
101% - 150%	80%

PPL encourages agencies to use the Percent of Bill option.

In addition to those two calculated amounts, there is an Agency Selected option. This custom amount is set by the agency caseworker if there are extenuating circumstances that the customer is facing. Agencies reported that they do not use the Percent of Bill option when it is equal to the budget bill, when the customer has experienced a hardship, when the customer is on a fixed income and the Percent of Bill payment is too high, or when the customer is recertifying and the new payment is significantly higher than the previous payment.

When asked how they assign payment plans to the customers, agencies provided the following responses.

- Five agencies use the Percent of Bill option the majority of the time.
- One agency only uses the Percent of Bill option.
- One agency most frequently uses the Agency Selected option, followed by the Percent of Bill option.

OnTrack payments are capped so that a customer's energy burden will not exceed the maximum levels in the CAP Policy Statement, subject to the minimum payment guidelines. The minimum payment amount per month is \$30 for electric heat customers and \$12 for non-electric heat customers. Regardless of payment plan, a customer's payment may not be lower than these minimum values.

A monthly CAP Plus amount is calculated as the average LIHEAP grant received by OnTrack customers divided by 12. The adder is re-calculated every October. The CAP Plus amount has varied over time as a result of changes in LIHEAP funding.

**Table II-4
Historical CAP Plus Amounts**

CAP Plus Amounts	2012	2013	2014	2015	2016	2017	2018	2019
	\$8.00	\$5.00	\$2.50	\$4.00	\$3.00	\$3.00	\$4.04	\$3.47

Customers are not billed for the CAP Plus amount in the months when they have a LIHEAP credit on their bill. When the LIHEAP grant is depleted, customers return to being charged the CAP Plus amount.

If an OnTrack customer moves residences within PPL's service territory, their payment amount will be recalculated. The customer's estimated bill in the new home is based on the average usage of the home's previous resident. This amount is not adjusted until the customer recertifies in the program, 18 months after moving to the new home. This is a change from the previous design which only recalculated the payment amount if the heat source changed from electric to non-electric, or vice versa.

Control of CAP Credits

PPL follows PUC guidelines to control CAP credits.

Minimum payment levels are \$30 for heating customers and \$12 for non-heating customers, and CAP credits vary depending on account classification and poverty level. These credit limits were first enforced in 2008. PPL's CSS generates warning letters when the customer reaches 50 and 75 percent of these limits. These letters are sent at the point in the 18-month period when customers reach these limits.

When asked about customer feedback on the letters that say they are approaching the maximum credit, all agencies reported that customers are confused by the letters and by the maximum credit.

Customers are no longer removed from OnTrack if they exceed the maximum benefit levels prior to the end of the 18-month program period. When customers reach these limits, they are sent a letter that informs them that they are being moved to OnTrack Budget Billing (OTBB). This letter also explains that PPL will automatically send a program application when the time comes for recertification (18 months from their previous enrollment). If the customer's budget bill is higher than their actual usage, the excess amount is applied to the customer's arrearage. If the arrearage is paid off, the customer is moved to the OnTrack Budget Billing – All Forgiven status, in which the system switches their payment to the actual usage amount if that amount is lower than the budget bill.

When asked what feedback they have received from clients who have been moved to OnTrack Budget Billing (OTBB), agencies provided the following information.

- Four agencies reported that customers are unhappy.
- Three agencies reported that customers are surprised by the significant increase in their payment amount.

- Two agencies reported that customers are unsure why their payment amount changed.

Arrearage Forgiveness

If applicable, customers receive arrearage forgiveness each month that they are enrolled in OnTrack and that they make their monthly payment. If customers miss their payment, they will receive the arrearage forgiveness when they pay their On-Track catch-up amount.

The monthly arrearage forgiveness is the customer's arrearage at the time of OnTrack enrollment divided by 18 months. The arrearage forgiveness is shown on the customer's statement of account, in CSS, and in the Remote Energy Portal (REP).

D. Program Outreach and Referrals

PPL customers are most likely to be informed of OnTrack through referrals from their CSRs and/or Customer Service Contractors. CSRs have daily contact with low-income, payment-troubled customers with overdue balances.

Several other sources of potential participants include the following.

- PPL's internal lists of low-income customers with overdue balances.
- OnTrack administering agencies
- Other community-based organizations
- Other Universal Service Programs
- LIHEAP data

E. Enrollment Procedures

Enrollment for OnTrack follows the process described below.

1. There are multiple ways that a customer can initiate the screening process for OnTrack.
 - During a payment assistance interaction with the PPL contact center, if the customer is a good fit for the program, the CSS will automatically alert the customer service representative, and a program application will be sent to the customer. The representative will inform the customer that an application is on the way.
 - The customer can call PPL and apply over the phone or request an application.
 - The customer can call the local CBO and request an application.
 - The customer can visit the local CBO's website (some CBOs have this available) and download an application.
 - The customer can walk-in to the CBO office and complete an application or ask for assistance.
 - The customer can apply online on PPL's website.
2. Customers who were recently referred to the program (within the last week) receive a "You Were Recently Referred" reminder call that tells them to expect the application in a gold envelope in the mail.

3. If the customer returns the application, the OnTrack CBO processes the application.
 - The agencies use the same guidelines as LIHEAP to classify the customer as income-eligible for OnTrack.
 - The customer must provide documentation of income. In some cases, customers' reported incomes are less than or equal to their mortgage payments or rent, but they are not in foreclosure or facing eviction. This has caused some concern that customers might not be accurately reporting their income, so in these situations, customers are enrolled in the OnTrack Lifestyle (OTL) program, in which they are required to update their income information every nine months.
 - Agencies will contact customers if they send in an incomplete application or an application that does not include the required income documentation. Agencies reported that they need to follow up with customers who do not submit complete applications anywhere from 40 to 95 percent of the time.

All agencies follow up with customers when the application is missing information. Agencies employ the following contact methods for follow-up.

- Three agencies use a combination of phone, email, and U.S. mail to contact customers.
- Two agencies use either phone or email.
- Two agencies use a combination of phone and email.

Agencies reported that they follow up with customers up to four times.

- Two agencies follow up with customers once before sending a rejection letter.
- One agency follows up with customers once per contact method.
- Three agencies follow up with customers two to three times.
- One agency follows up with customers up to four times.

Agencies vary in the amount of time they give clients to respond to requests for additional information.

- One agency rejects applications after four business days.
- One agency rejects applications after ten days.
- Two agencies reject applications after 14 days.
- Two agencies reject applications after 15 days.
- One agency rejects paper applications immediately, but online applications after 14 days.

4. After the completed application is received, the agency can enroll the customer in OnTrack and select a payment plan.

The ability to apply for OnTrack online has resulted in increased customer satisfaction with the application process. However, there is a concern that with an increasing number of customers applying over the phone or online, the customers do not have the opportunity to interact with staff at the agency and develop a full understanding of the program. Agencies

were asked how PPL should communicate information about OnTrack to customers who do not sign up at the agency.

- Three agencies felt that PPL customer representatives who make referrals to the program could do a better job of communicating program information to customers.
- Two agencies reported that the information provided to customers is sufficient.
- One agency believes that PPL should explain to customers that the program is designed to assist those unable to afford their energy bills; provide customers with agency contact information or the link to the online application; and emphasize that the program offers a fixed payment amount, which is useful for budgeting.
- One agency would like PPL to provide general information about all customer assistance programs in bill inserts.

F. Referrals for Other Services

During the application process, customers are referred to several programs if needed. All agencies reported that they provide customers with referrals to other programs when they discuss their OnTrack application. The most common referrals are to LIHEAP and WRAP, but many other types of referrals and information are also provided, as noted below.

- LIHEAP (5 agencies)
- WRAP (4 agencies)
- WAP (1 agency)
- Energy saving kits (1 agency)
- OnTrack (1 agency)
- UGI's assistance programs (1 agency)
- Food banks (1 agency)
- Food stamps (1 agency)
- Veteran assistance programs (1 agency)
- Head Start (1 agency)
- Office of Aging (1 agency)
- AmeriCorps (1 agency)
- Childcare subsidy programs (1 agency)

If the customers are not eligible for OnTrack, they may be referred to several programs.

- Operation HELP
- LIHEAP
- WRAP
- PPL Payment Agreement
- Budget Billing
- CARES
- Counseling Services

G. Recertification

The OnTrack program period is 18 months in length and the recertification process begins at month 17. Customers who received LIHEAP funds within the past 16 months or have SSI as

a source of income are automatically recertified one time. Their previous financial statement is used for recertification, and the payment amount is reassessed based on their current usage. These customers are only eligible for automatic recertification one time. Customers who do not qualify for automatic recertification are sent a program cover letter and application.

All seven agencies reported that the recertification process is the same or essentially the same as the enrollment process. Two agencies reported that they take the following additional steps during recertification.

- Both agencies reported that they ensure that the customer is in the 17th month of their program cycle and is up to date on PPL payments.
- One agency reported that they review the customer's usage over the last 18 months and check whether electric heating customers have applied to LIHEAP. If the customer has not applied to LIHEAP and the agency is able to speak with the customer at the time of recertification, they will advise the customer to apply for the program.

All agencies assess the customer's situation, arrearages, and usage, when assigning the new payment amount at the time of recertification. The five agencies that most commonly use the Percent of Bill option at initial enrollment reported that they are more likely to use the Agency Selected option at the time of recertification to prevent a significant increase in the customer's payment amount.

When asked about the frequency with which they increase clients' payment levels during the recertification process, agencies reported that they increase the payment level between five percent and 100 percent of the time. They reported that the customer's payment will increase if the customer has experienced an increase in income or usage.

Previously, at recertification, customers would be graduated if their OnTrack payment was within ten percent of their budget billing and all their arrearages had been forgiven. PPL eliminated the graduation process because they believe low-income customers will continue to face challenges with their utility bills.

H. Follow-up and Removal

Customers must meet the following requirements to remain active OnTrack participants.

- Make on time OnTrack payments during each current billing period. The consequence for non-payment is immediate initiation of termination procedures. As soon as one payment is missed, the customer will receive an automated letter from OnTrack. The customer will enter the collections process, but will not have service terminated if it is the winter. After the moratorium is over, the customer can be shut off. If a customer misses a payment of less than \$60, no collection activity will ensue. After the second consecutive missed payment, the customer is removed from OnTrack.
- Provide access to electric meters.

- Verify household income during the recertification process. The exception is for customers who receive LIHEAP or SSI. Customers who do not respond to the recertification application will be removed from OnTrack and sent a letter that states the reason for removal. Customers can be reinstated when they send in their application and documentation.
- Report changes in the household income or number of household members that occur at any point after enrollment.
- Participate in weatherization, energy conservation education, budget counseling, and other related services.

Customers may be removed from OnTrack for the following reasons.

- Missed two consecutive payments.
- Failure to allow access to the meter.
- Failure to comply with WRAP.
- Failure to verify eligibility.
- Voluntary withdrawal.
- No longer a PPL customer.

Customers will automatically be reinstated in OnTrack, have late payment charges reversed, and have all past credits applied when they make up all of their missed payments.

I. OnTrack Statistics

PPL develops several reports that allow for analysis of their program enrollment, retention, and participation. Table II-5 displays the number of customers who were newly enrolled, existing enrollments, total enrollments, and active participants. Over 29,000 customers enrolled in OnTrack in 2018. At the end of 2018, there were over 56,000 active participants.

**Table II-5
OnTrack Enrollments and Participants**

Year	New Enrollments	Existing Enrollment	Total Enrollments	Active Participants*
2017	24,037	9,938	33,975	51,692
2018	29,359	8,827	38,186	56,539

*Active Participants as of December.

Table II-6 displays OnTrack expenditures. The table shows over \$56.5 million for CAP credits, \$19.6 million for arrearage forgiveness, and \$3.9 million for administration in 2018. Total expenditures in 2018 were over \$80 million.

**Table II-6
OnTrack Program Expenditures**

Year	Revenue Shortfall	Arrearage Forgiveness	Administration	Total Expenditures	Percent of Budget
2016	\$55,272,994	\$28,329,047	\$2,698,426	\$86,300,466	132%
2017	\$54,340,127	\$23,228,101	\$3,341,574	\$80,909,802	76%
2018	\$56,538,150	\$19,617,289	\$3,879,288	\$80,034,726	62%

J. Program Coordination

PPL prioritizes OnTrack customers with high usage for WRAP and is always assessing new methods to increase these linkages. In June 2018, PPL introduced automatic referrals to WRAP for OnTrack customers with high usage. PPL currently defines “high usage” households as those that use more than 18,000 kWh annually.

K. Challenges

PPL and agency managers and staff described challenges that are faced in the OnTrack program. These challenges are summarized below.

- Lifestyle Customers:** Many PPL and agency staff expressed concerns with the program’s procedures for zero-income households to participate in OnTrack. Lifestyle participants are defined as customers with housing expenses that exceeded income, and zero-income customers are a subset of this group. These customers were previously only permitted to participate in that status for six months. They are now permitted to re-enroll in OnTrack Lifestyle every nine months for an unlimited number of times.

Staff are concerned that some of these customers may be committing fraud, and recommend changes to the current practice. Agencies recommended that PPL limit the amount of time a customer can be considered zero-income and ask customers who are claiming zero income to provide additional information.
- OnTrack Budget Bill:** OnTrack participants who exceed the maximum credit and are transitioned to OnTrack Budget Billing are often surprised by and unable to pay the significantly higher budget bill amount. Additionally, the budget bill amount may be higher than the actual usage charge would be, which can be confusing for customers. Originally, PPL anticipated that customers might be on OTBB for only a few months before OnTrack recertification, but they have found that customers have been transitioning to OTBB earlier than expected.
- IT Challenges:** While PPL has made several improvements to the online OnTrack system, including introducing an online application, there are additional features they would like to introduce. However, there are many demands on IT staff time, and they have not been able to have those additional changes implemented.

- **Incomplete Applications:** All agencies reported that many customers do not fully complete the OnTrack application. Agencies unanimously reported that a large percentage of applications require follow-up because they are incomplete. Five agencies reported that 40 to 60 percent of applications require some type of follow-up with the customer, one agency reported 90 to 95 percent require follow-up, and one agency reported that “the majority of customers” require follow-up.
 - Six agencies reported that customers commonly fail to submit income documentation or fail to submit complete income documentation. One agency reported that a third of their applications are rejected for failure to submit complete income documentation. They reported that clients struggle to gather the required documentation and that some customers are confused about what information needs to be submitted. Additionally, the fact that income documentation is not required when initially submitting the application is an issue because the application cannot be processed until the documentation is submitted.
 - Three agencies reported that customers often fail to include themselves as a household member and/or only list income-earning household members on the application.
- **Application Process:** Three agencies reported the following barriers with respect to the OnTrack application process.
 - *Language barriers* – OnTrack does not provide a printed Spanish-language application, and they encounter Spanish-speaking customers who are unable to understand the English application multiple times per day. (Note that the website and online application are available in Spanish.)
 - *Income eligibility barriers* – One agency recommended that the OnTrack income guidelines be increased to be closer to or match the Operation HELP guideline.

Agencies offered many recommendations for improving the application form and process.

- Clearly specify that customers should list all household members, regardless of income, on the application.
- Include a pop-up window on the online application that reminds the applicant to hit the submit button.
- Make the application easier to follow.
- Standardize the online and paper applications.
- Encourage applicants to submit their application and income documentation at the same time because it will reduce the time it takes to enroll the customer.
- Clearly state that applicants must submit up-to-date income documentation and note that applications cannot be processed without income documentation.
- Emphasize the importance of providing correct information on the home’s heating fuel.
- Require all customers, including LIHEAP customers, to submit an application and updated documentation to recertify for the program.

L. Program Changes

PPL has made several changes since the previous evaluation as documented in their 2017 - 2019 three-year Universal Service Plan.

- **OnTrack Program Period:** PPL changed the OnTrack period from 12 months to 18 months. This impacted the recertification timing, the maximum OnTrack credit, and the arrearage forgiveness timeline.
- **Online Application:** PPL introduced an online application for OnTrack, which has been positively reviewed by PPL and agency managers and staff. The benefits of the online application are that customers are automatically emailed when parts of their application are missing, and that application processing times have improved. The disadvantages are that customers who apply online do not visit the agency, meet with agency staff, receive education about OnTrack, and receive referrals to other programs.
- **CAP Payment Plans:** The Percent of Income option and the Average Annualized Payment option were removed to simplify the program.
- **Payment-Troubled Definition:** Customers are no longer required to default on a payment agreement in the past 12 months to enroll in OnTrack.
- **Overdue Balances:** Customers are no longer required to have an overdue PPL balance to PPL to enroll in OnTrack, as there are situations where enrollees may need the program even though they are not past due on their PPL bill. These households are eligible for the program but are not necessarily targeted by PPL's outreach efforts.
- **Recertification and Graduation:** PPL eliminated the graduation process. Customers must now request removal from OnTrack if they no longer wish to participate.
- **Maximum Credit:** Maximum CAP amounts are set based on FPL tiers and account type (electric heat or non-electric heat).
- **Energy Burden:** A customer's OnTrack payment is limited by the maximum energy burden levels in the CAP Policy Statement.
- **OnTrack Lifestyle:** PPL offers this option to customers whose reported income is equal to or below their mortgage/rent obligations but are not facing foreclosure or eviction. PPL previously permitted these customers to enroll in OnTrack for only six months. The current program allows customers to be in OnTrack for the full program cycle (18 months), as long as their income is verified every nine months, and there is no limit to the number of times that a customer can re-verify in the Lifestyle option.

- **OnTrack Payment Recalculation:** Monthly OnTrack amounts were previously only recalculated if customers who moved changed their primary heating fuel. Under the current program, payment amounts are recalculated for all customers who move.
- **Arrearage Charges:** All OnTrack customers previously paid the \$5 monthly arrearage charge. Under the current program, only customers with pre-program arrearages are charged this amount.
- **Generation Suppliers:** OnTrack participants were previously able to shop from any generation supplier that was available to them. Under the current program, participants can only shop from a select group of generation suppliers that offer rates up to seven percent lower than PPL's price to compare. Currently, there are no suppliers signing up for the program at this rate. Customers already on a shopping contract are permitted to stay on that contract until it ends.
- **Unit Cost Agency Payment:** In 2019, PPL implemented a unit cost payment system for their agencies. Agencies are now paid based on the number of enrolled customers, instead of on an hourly basis.

III. Operation HELP Program

Operation HELP, founded in 1983, is a hardship fund that is supported by PPL Electric Utilities, its employees, retirees, and its customers. Operation HELP provides grants to low-income customers who have overdue balances and cannot pay their energy bills.

A. Fundraising

PPL encourages its customers to contribute to Operation HELP by adding \$1, \$2, or \$5 to their monthly electric bill or by sending in lump-sum donations. PPL's customer service billing system allows customers to donate any amount to the program and specify the time period for which they would like to make contributions. Employees can support Operation HELP through payroll deductions and retirees can contribute through pension reduction or lump-sum donation.

PPL proposed the following Operation HELP solicitation activities for 2017 through 2019, to be conducted each Summer and Winter.

**Table III-1
PPL Fundraising Activities**

Method	Audience
Bill Insert and Message	All Customers
Enrollment Form	All Customers
Return Postcard	Electronic Fund Transfer Customers
PPL President Letter	All Employees and PPL Retirees
News Release	General Public
Response to Customer Inquiries	All Customers
Internal Electronic Newsletter	All Employees

PPL's other fundraising activities include a golf tournament. All PPL final bills with balances under five dollars are directed to the Operation HELP fund.

B. Goals and Resources

The objectives of Operation HELP are as follows.

- Provide energy-related financial assistance to qualified low-income families who are having difficulty paying their energy bills.
- Offer energy-related financial assistance to low-income households that are ineligible for LIHEAP.
- Expand the capabilities of CBOs that provide energy-related assistance.
- Administer a year-round program as funding permits.

The projected annual budget for Operation HELP for 2011 through 2019 is shown in the table below. The budget was \$1.3 million for 2011 through 2013 and \$1.4 million for 2014 through 2019.

**Table III-2
Operation HELP Budget**

Year	Operation HELP Funding Level
2011	\$1,300,000
2012	\$1,300,000
2013	\$1,300,000
2014	\$1,400,000
2015	\$1,400,000
2016	\$1,400,000
2017	\$1,400,000
2018	\$1,400,000
2019	\$1,400,000

PPL increased funding from \$700,000 in 2007 to one million in 2008 and each year through 2019. Combined with customer and staff contributions, the total available has been about \$1.37 million. The corporate amount does not vary based upon customer and staff contributions.

**Table III-3
Operation HELP Donations**

Year	PPL	Customers	Employees	Total
2017	\$1,000,000	\$347,577	\$30,876	\$1,378,453
2018	\$1,000,000	\$337,482	\$36,002	\$1,373,484

PPL's Operation HELP donation is allocated to Operation HELP grants, matching credits, agency administration, and CARES credits. In 2017 and 2018, the funds were allocated as shown in the table below.

**Table III-4
Operation HELP Expenditures**

	Grants	Matching Credits	Administration	Fundraising Costs	CARES Credits	Total
2017	\$611,680	\$168,980	\$158,491	\$19,952	\$52,035	\$1,011,138
2018	\$882,500	\$250,377	\$173,300	\$21,621	\$54,000	\$1,381,798

Table III-5 shows that Operation HELP grants averaged \$360 for recipients in 2018.

**Table III-5
Operation HELP Assistance by Year
Program Analysis Sample**

Year		Analysis Observations	Help Grants	Matching Credits	Total Assistance
2017	Total Assistance	1,825	\$611,680	\$168,980	\$780,660
	Average Assistance		\$335	\$93	\$428
2018	Total Assistance	2,454	\$882,500	\$250,377	\$1,132,876
	Average Assistance		\$360	\$102	\$462

C. Operations

PPL’s management, RPSs, and administrative support provide oversight and manage the day-to-day program administration.

PPL has the following responsibilities.

- Collecting and disbursing contributions to the CBOs.
- Providing funding for program administration.
- Processing Operation HELP payments.
- Soliciting donations from customers, employees, and retirees.
- Maintaining close working relationships with the CBOs.
- Conducting procedural audits to review performance.
- Reporting to the PUC.

PPL contracts with 14 CBOs to administer Operation HELP. Almost all of these CBOs have been involved with the program since its inception in 1983.

Agency responsibilities are as follows.

- Conducting intake and verifying applicants’ eligibility.
- Verifying customer information with energy vendors.
- Processing Operation HELP authorization forms.
- Sending timely payments directly to energy vendors.
- Referring applicants to other assistance programs.
- Establishing a separate account for processing donations and disbursements.
- Maintaining detailed program records and arranging for an annual financial audit of Operation HELP.
- Entering case information directly into PPL’s database via a web-based authorization form.

Most Operation HELP agencies are well-equipped to speak with Spanish-speaking clients. APPRISE interviewed ten of the Operation HELP agencies and found that six of the ten have one or more staff members who can communicate with clients in Spanish. Three

agencies have staff who can communicate with customers in languages other than English or Spanish. Four agencies have access to a language line service, which allows them to communicate with customers in various languages.

PPL has several avenues for agency training and communication.

- **Meetings:** PPL conducts meetings throughout the year with the CBOs to discuss program progress and special situations.
- **Feedback:** RPSs provide monthly reports to the CBOs that monitor and track their performance.
- **Quality Control:** PPL encourages the Operation HELP agencies to have a Certified Public Accounting firm conduct an annual financial audit of the program. Some agencies complete the audit in conjunction with their annual federal and state-funded program audits.
- **External Audit:** PPL uses an outside auditor to review internal procedures and Operation HELP records. The audit includes a review of record-keeping procedures and a reconciliation of donations from a sampling of customers.
- **Procedural Audit:** RPSs also conduct procedural audits of the Operation HELP agencies. The purposes of these audits are to:
 - Review CBOs' record keeping procedures.
 - Identify problem areas.
 - Discuss findings with the CBOs and implement corrective action where necessary.
 - Monitor CBOs' adherence to Operation HELP guidelines and procedures.
 - Ensure the proper expenditure of donations.

D. Eligibility and Benefits

This section describes Operation HELP eligibility guidelines and benefits that are provided through the program.

Eligibility Guidelines

Operation HELP aims to reach income-eligible customers who face hardships and have an inability to pay the full amount of their energy bills. Applicants are not automatically eligible for assistance by virtue of their income, age, or family circumstance. The eligibility criteria are as follows.

- Annual income at or below 200 percent of the Federal Poverty Level.
- Active PPL account and resides in PPL's service area.
- Grant should resolve the PPL requirement to maintain or restore service.
- Customers can receive assistance once in a calendar year, but CBOs have flexibility to review referrals if customers have compelling and extenuating circumstances. They must discuss extenuating circumstances with PPL's RPSs.

- Operation HELP cannot be used for security deposits, reconnection fees, or charges for insufficient funds.

Seven of the ten interviewed agencies reported that they try to target Operation HELP grants to customers who would not be suitable for OnTrack. One agency reported that staff will automatically process an Operation HELP application for OnTrack applicants above the OnTrack income guidelines.

When interviewing applicants for Operation HELP, the CBOs generally consider the following factors.

- Death of primary wage earner.
- Serious injury or illness to primary wage earner.
- Life-threatening or health-threatening situations.
- Families with infants.
- Households with elderly or disabled occupants.
- Eligibility for LIHEAP.
- PPL Electric overdue amount and payment history.

All agencies reported that they assess the client's past payment efforts when they apply for Operation HELP; however, the purpose of the assessment varies across agencies. Only one agency reported that they use the customer's payment history to determine if the customer is eligible for a grant. Another agency reported that they assess whether the customer is truly in a hardship situation to determine if the customer will receive the grant. The others do not require a payment history, but use the information for customer education purposes.

Program Benefits

Operation HELP provides services throughout the year. The benefits include the following.

- Direct financial assistance for overdue bills. The assistance can be used for any type of home energy bill – electric, gas, coal, oil, etc.
- The Operation HELP grant is what is needed to maintain service, up to \$750. The customer can also receive up to \$375 in matching credits, so the total can reach \$1,125.
- A payment toward the PPL bill through Operation HELP is eligible to receive matching energy credits on a 2:1 basis. For example, if the payment from the administering organization is \$100, then PPL matches it with another \$50 from company funds, if requested.
- Protection against shutoffs. If PPL has issued a service termination or has already cut an applicant's service and the grant is sufficient to maintain or reconnect service, agencies call PPL's customer service line to restore service or prevent termination.
- Referrals to other programs and services.

E. Application Procedures

Customers are referred to Operation HELP through PPL and through the community. Some customers come back every year for assistance. All ten agencies that were interviewed reported that there are no barriers to application for Operation HELP.

Half of the agencies reported that customers are required to come to the agency to apply for Operation HELP, while the other half reported that this is not a requirement. Four of the five agencies that require customers to come into the office reported that they make exceptions to this requirement if customers are homebound or have no means of transportation. These agencies allow customers to fax their materials, have a family member or friend come in their place, or mail the application. One agency also reported that they could send case managers to the customer's home, though they have never had to do so.

The five agencies that do not require applicants to come into the office to apply reported using the following additional application methods.

- Mail (4 agencies)
- Phone (3 agencies)
- Fax (3 agencies)
- Email (3 agencies)

When customers apply for Operation HELP benefits, the agency caseworkers have the following responsibilities.

- Contacting the appropriate energy vendor to verify the customer information.
- Determining eligibility for PPL matching credits.
- Processing Operation HELP authorization forms.
- Notifying the vendor and customer of the pending payment.
- Sending timely payments directly to energy vendors, so they can be credited to the customers' accounts.
- Providing education on energy conservation. This information includes referrals, energy conservation tips, energy kits, and materials about energy conservation.
- Referring applicants to other assistance programs. Nine of the ten interviewed agencies reported that they provide customers with referrals to utility assistance programs, weatherization services, and food banks, among other types of assistance. Common referrals reported by the agencies were as follows.
 - LIHEAP (7 agencies)
 - OnTrack (4 agencies)

- WRAP (4 agencies)
- Budget counseling (2 agencies)

Agencies provided the following additional information about their referral process.

- The agency does not want customers to think that they are guaranteed funds through Operation HELP, so staff encourage customers to apply for any assistance for which they may be eligible.
- Staff will refer customers to any program that would stabilize their income or provide financial assistance.
- Generally, the agency tries to refer customers to other agencies that provide multiple types of assistance.

Two of the agencies also provide the following direct services within their office or within other departments in their agency.

- One agency helps customers fill out applications for other programs, like OnTrack.
- One agency helps customers fill out their Operation HELP application, as fifty percent of their customers are unable to read or write in any language. Additionally, this agency stores bags of food and donated coats in their office, so Operation HELP staff are able to provide customers with food or a jacket if they need it.

F. Successes

The agencies interviewed offered mostly positive feedback about Operation HELP. They reported that the program works well and that customers feel positively about Operation HELP. The customers are very grateful for the assistance provided.

G. Challenges

Challenges faced in the Operation HELP program are described below.

- **Agency Funding:** Three agencies reported that they do not receive enough funding to administer the program.
- **Operation HELP Grant Awards:** PPL reported that some agencies have large balances of Operation HELP funds remaining because their priority is to enroll customers in OnTrack. However, agencies reported that they run out of funds and that they have additional requirements for grant receipt or avoid providing the maximum grant so they can serve more customers.
- **Funds Disbursement:** The current process to disburse funds from PPL to the agencies is a manual one with funds sent back and forth from PPL to the agencies and then back to PPL.
- **Application Process:** PPL staff reported that program operations would be simplified if the same agencies administered OnTrack and Operation HELP and if there was a single application for all Universal Service Programs, including Operation HELP.

- **Income Calculations:** Agency caseworkers sometimes miscalculate customers' annual incomes when completing their Operation HELP applications. A common mistake is to multiply the customer's paycheck by 12 instead of 26 or 52.
- **Customer Service Line:** Agencies reported that they have difficulties contacting or obtaining correct information from PPL's customer service representatives. Agencies also reported that PPL customer service representatives often do not know how to assist with Operation HELP issues, they often must wait on hold for up to ten minutes to reach a representative, or that representatives provide information about Operation HELP to customers who are not eligible because they are not at risk of termination, shut off, or behind on their bill.

IV. CARES Program

CARES is a referral service for customers with temporary hardships such as illness, injury, loss of employment, or high medical bills. This program serves customers who generally meet their payment obligations but face a hardship that requires some assistance.

The primary objectives of CARES are as follows.

- Help customers experiencing temporary hardships to manage their overdue electric bills by providing them with information and resources.
- Make tailored referrals to PPL Electric and/or community assistance programs.
- Maintain and/or establish partnerships with community-based organizations to ensure maximum and timely assistance for CARES customers.
- Act as an internal advocate for payment troubled customers.

A. *Goals and Resources*

The annual funding for CARES has been \$54,000 each year from 2011 through 2019.

B. *Operations*

CARES is managed by a USR, the four RPSs, and a Program Manager. The Program Manager develops program guidelines and communications, sets funding levels, and resolves escalated customer issues. The RPSs provide the day-to-day administration and approve the CARES hold lengths and credit amounts set by the USR. The USR reviews the CARES referrals made by contact center representatives, verifies that the customer has a good payment history, and provides the customers with a hold (of 30, 60, or 90 days) or a one-time credit.

C. *Eligibility and Benefits*

Residential customers, regardless of income level, who face a temporary hardship that could result in the loss of electric service are eligible for CARES. Temporary is defined as three months or less.

The CARES staff member analyzes customer accounts and circumstances to determine the basic cause(s) of their bill-payment problems. This information is used to direct the customer to programs and services.

The benefits of CARES include the following.

- Protection against shutoff of electric service.
- Referrals to other programs and services. PPL support staff communicate directly with CARES customers and try to match their needs with PPL and/or community programs.

USRs use CARES credits to help pay electric bills for customers who have run out of other options. This may happen when LIHEAP is closed or the customer is ineligible for services

because his or her household income is above the program guidelines. The most common issues faced by CARES recipients are medical issues or loss of income. No formal guidelines exist for the use of CARES credits. The funds are applied on a case-by-case basis.

PPL relaxed the criteria for CARES in 2018. They increased the maximum grant amount from \$400 to \$750 and increased the allowed arrearage amount from \$800 to \$1,000. Additionally, customers who are in the mediation process with the PUC are now eligible to participate in CARES.

Table IV-1 displays the number of customers who received CARES credits and the amount of credits applied to those customers' accounts. The table shows that the mean CARES credit was \$432 in 2018.

**Table IV-1
CARES Credits**

Year	Customers Who Received CARES Credits	Total Credits Applied	Credits per Customer in Dollars			
			Mean	25 th Percentile	50 th Percentile	75 th Percentile
2017	142	\$52,035	\$366	\$325	\$400	\$400
2018	125	\$54,000	\$432	\$400	\$400	\$485

D. Program Referrals

PPL does not conduct outreach for CARES because the need for assistance is always greater than the amount of funding available; however, PPL would like to find ways to serve more customers through the program. The primary sources of referrals are as follows.

- PPL Electric's Customer Contact Center (CCC)
- Social agency caseworkers
- Self-referrals

Conditions when CCC employees and CBO caseworkers refer customers to CARES include the following.

- Illness, injury, or high medical bills
- Previously good-paying customers with temporary hardship situation
- Recent loss of job or major reduction in household income
- Abandoned spouse
- Confused and disoriented customer

V. Winter Relief Assistance Program Description

PPL implemented the Winter Relief Assistance Program (WRAP) in 1985 to help reduce electric bills and improve home comfort for low-income customers. The objectives of the WRAP are to reduce energy usage and bills of low-income customers and to increase low-income customers' ability to pay their electric bills, resulting in reduced arrearages. The program also aims to improve health, safety, and comfort for low-income occupants; create and maintain partnerships with community-based organizations and contractors; and make referrals to other low-income assistance programs. This section describes the policies and procedures for PPL's WRAP. The findings in this section are based upon review of program documents, analysis of program statistics, interviews with PPL personnel who have responsibilities related to WRAP, and interviews with ten of the 22 WRAP agencies and contractors.

A. WRAP Background

The Pennsylvania Public Utility Commission (PUC) directed PPL to develop a weatherization program for electric heating and/or electric water heating customers with income below 150 percent of the poverty level in 1984. The program was implemented with a \$2 million annual budget, and offered insulation, storm windows, caulking and weather-stripping, and water heating measures. It was the first utility run weatherization program in Pennsylvania.

In 1988, the PUC required that all electric and gas utilities in Pennsylvania offer a low-income usage reduction program (LIURP) to customers in their service territories, and WRAP became part of LIURP. PPL increased WRAP funding to \$3 million annually and added energy education to the program services. Program services were enhanced again in 1992, 1995, and 1998 with blower door testing, and air infiltration measures. Education, LEDs, and refrigerator replacement are provided for baseload customers.

The PUC increased PPL's WRAP annual expenditure goal to \$5,700,000 with the implementation of universal service in 1999, and to \$6,250,000 in accordance with PPL's rate case settlement in 2005. The budget has increased every few years, reaching \$8 million for 2011 through 2013 and \$9.5 million for 2014 through 2016. The budget again increased from \$9.5 million to \$10 million as part of its 2016 distribution rate case settlement. The program budget for 2011 through 2019 is shown in the table below.

**Table V-1
WRAP Funding**

Year	Budget
2011	\$8,000,000
2012	\$8,000,000
2013	\$8,000,000
2014	\$9,500,000

Year	Budget
2015	\$9,500,000
2016	\$9,500,000
2017	\$10,000,000
2018	\$10,000,000
2019	\$10,000,000

The WRAP objectives are as follows.

1. Reduce the energy usage and electric bills of low-income customers.
2. Increase the ability to pay/decrease arrearages of low-income customers.

Secondary objectives include the following.

1. Improve comfort for low-income customers.
2. Promote safer living conditions of low-income customers through the reduction of secondary heating devices.
3. Maintain/establish partnerships with social service agencies, community-based organizations (CBOs), and local contractors to ensure maximum and timely assistance.
4. Make tailored referrals to Company and other assistance programs such as OnTrack, Operation HELP, LIHEAP, and other weatherization programs.

B. Program Management and Administration

PPL's WRAP Manager is responsible for managing the program." Her responsibilities include the following.

- Regulatory and internal reporting and compliance.
- Creating program strategy.
- Overseeing procedural changes and communicating to internal and external personnel.
- Overseeing coordination with other utility and weatherization programs.
- Allocating and monitoring funds in the regions.
- Supporting the RPSs and USRs.

There are four RPSs who oversee the implementation of WRAP in their geographical areas. The RPSs have the following responsibilities.

- Allocating a contract amount to each of the contractors in their region.
- Negotiating contracts with the contractors.
- Overseeing the work of the contractors.
- Approving exceptions and invoices.
- Monitoring the budget.
- Supervising staff.
- Reviewing their contractors' prices each year.
- Conducting field audits of contractors' work a few times each year.

USRs have the following responsibilities.

- Preparing WRAP applications for processing, including verifying the customer's eligibility and obtaining landlord consent, if necessary.
- Assigning work to the contractors. USRs will call or send a letter to customers to provide information about the contractor who will be contacting them.
- Reviewing contractor invoices and sending them to RPSs for approval.
- Responding to inquiries from customers or contact center representatives.

PPL plans to establish a universal service stakeholder group that meets at least twice per year. This group will work to improve PPL's Universal Service Programs, including WRAP, through information sharing and inviting feedback. Additionally, contractors are involved in the evolution of the program, developing field standards, providing suggestions for program improvements and pilot measures, and reviewing potential program changes. PPL has utilized consultants to develop field standards, determine areas where training is needed, and conduct supplemental training.

C. Targeting and Referrals

OnTrack customers are strongly encouraged to participate in WRAP, and the majority of WRAP referrals currently come from OnTrack.

Customers are usually referred for WRAP services in one of the following ways.

1. OnTrack Referrals – Customers who apply for OnTrack are required to apply for WRAP if they meet the usage criteria. Customers with annual usage of 18,000 kWh or greater are automatically enrolled in WRAP.
2. Customer Contact Center (CCC) referrals – Customer Service Representatives are trained to refer payment-troubled customers or customers experiencing hardships to WRAP. The WRAP support person in the appropriate area follows up with a letter and/or phone call.
3. Advertising – Customers call a designated call center in response to WRAP outreach or advertising. The representative usually completes the application with the customer over the phone. PPL also uses call centers to do outbound calling for customers at or below 200 percent of the poverty level with high electric usage.
4. Direct referrals – The customer or a caseworker calls the WRAP toll-free number (1-888-232-6302). A PPL employee responds to inquiries and completes the application with the customer over the phone.

In previous years, PPL has conducted outreach via telemarketing to electric heating customers who have received LIHEAP. Outreach to these customers is prioritized based on usage. PPL has proposed using some or all of the following efforts to promote WRAP.

- Phone calls, mailings, and e-mail "blasts" to electric LIHEAP recipients and customers identified as "low-income" in PPL's CSS.

- Presentations and communications to PPL Electric employees, including program information on the Customer Service internal website.
- Cross marketing to other weatherization and utility programs.
- Program information on PPL Electric's website.
- Social media.
- Presentations and communications to social service agencies, senior citizens' groups, and other organizations.
- Participation in community events, PUC/Utility events, and booths at high-traffic areas where customers with limited-incomes can be reached.
- Telephone and personal contact with housing authorities, multi-unit project managers, and community groups.
- Press releases and "free" news segments.
- Low-cost print media options.
- Word-of-mouth/WRAP Contractor referrals

PPL Tracks the number of qualified WRAP participants and how they heard about the program through its Low-Income Energy Assistance Programs (LEAP) database.

D. Eligibility

Customers must meet the following requirements to be eligible for WRAP.

- The household income is at or below 150 percent of the Federal Poverty Level. PPL will serve up to 20 percent of customers who are between 150 and 200 percent of the FPL through its LIURP budget.
- The primary customer is at least 18 years old.
- The customer's home is individually metered.
- The customer's home is a primary home.
- The electric service is in the name of one of the household's occupants, except when the home is part of a multi-unit project and the service is temporarily in the landlord's name.
- The home has not received WRAP in the past three years and has the potential to receive energy-reduction measures and services. PPL staff will consider applicants who received WRAP in the last three years on a case-by-case basis.
- The customer has lived in the home for at least nine months. Exceptions are made to this rule with PPL approval.
- Minimum usage of 6,000 kWh per year. Exceptions can be made for customers in very small premises, hardship situations, or when there is inter-utility coordination.

Apartment buildings with three or more units and 50 percent of tenants who qualify for WRAP are eligible for services to all tenants in the building.

Renters can receive WRAP services, but the landlord is required to provide written consent before the customer is approved for the program. The USR will send an authorization form to the landlord to receive approval for program services. The customer will receive one or more of the following if landlord consent is not received.

- Referral to the Act 129 Low-Income Program, if eligible.

- Provision of an energy-saving kit if between 150 and 200 percent of FPL.
- Phone or in-home energy education.
- Limited baseload services.

PPL offers baseload WRAP services when a family's income is less than their rent or mortgage obligations. PPL may also provide partial weatherization in situations where lifestyle choices account for major energy use.

E. Program Enrollment

The following strategies are employed to enroll customers in WRAP.

- Customer calls the customer care center or responds to an outbound call. The customer care associate enters the information into LEAP and informs the customer of their eligibility status.
- Customer completes a hard copy application as a result of an outbound mailing, agency referral, or personal contact; and mails to a PPL office. PPL scans the application and related information into a central work management system. A PPL USR enters the information into LEAP and notifies the customer of their eligibility status.
- Customer applies through PPL Electric's website. The customer will receive an auto-generated message as to whether the application is accepted along with a Case Number, or if the application is under review.
- Customer completes an application in-person. A representative enters the information into LEAP and notifies the customer of their eligibility status.
- WRAP contractor mails, faxes, or delivers a completed WRAP Application. The PPL USR enters the application into LEAP and notifies the contractor and/or customer of their eligibility.
- The customer receives Act 129 WRAP, and the CSP recommends additional measures through LIURP using the LEAP system. PPL staff will determine if the customer is eligible for LIURP.

Customers must fill out the WRAP application online, over the phone with a PPL representative or agency caseworker, or fill out the application at home and mail it to PPL to be considered for WRAP. USRs review completed applications and check that the data are complete. If information is missing from an application, they will call the customer, and then send a letter if they cannot get in touch with the customer by phone.

LEAP screens an application for LEAP eligibility. If eligible, LEAP assigns a Case Number and matches to the appropriate program (LIURP or Act 129 WRAP) and job type. The USR reviews and sends the customer an eligibility or ineligible letter with an explanation.

If eligible, the USR assigns the job to a contractor or places the job on a waiting list depending on the contractor workload and funding for the area. The contractor retrieves the customer information, usage history and audit information through LEAP.

The contractor then attempts to schedule an appointment with the customer. Two organizations reported that they have recently found that customers do not respond or do not know about WRAP when they call, and nine of the ten organizations reported that no response to contact attempts was the primary reason they are unable to serve customers.

Service delivery organization staff discuss the following topics when calling customers to recruit their participation.

- Measures customers could receive from the program (5 organizations)
- Benefits of the program, including lower electric bills and reduced energy usage (5 organizations)
- An explanation of the audit (4 organizations)
- An explanation of who the contractor is and why they are calling (3 organizations)
- Universal Service contact information if the customer is apprehensive about the legitimacy of the call (1 organization)
- An explanation of the customer's eligibility, if they were automatically referred to WRAP from OnTrack (1 organization)
- An explanation of WRAP (1 organization)
- That participation in WRAP is free (1 organization)
- Verification of eligibility (1 organization)
- Answers to customers' questions (1 organization)

Contractors generally reported high service delivery success rates. Most reported that they were able to serve over 70 percent of referred customers. Organizations listed the following barriers that have prevented service delivery in homes.

- Mold (6 organizations)
- Uncontrolled moisture (5 organizations)
- Pests (4 organizations)
- Roof leaks (4 organizations)
- No-shows for scheduled appointments (1 organization)
- Flooded basements (1 organization)
- Domestic issues in the household (1 organization)
- Deteriorated foundations (1 organization)
- Unvented gas or propane heaters (1 organization)
- Faulty wiring (1 organization)

F. Job Types

All participants are eligible for the following standard measures.

- Energy education
- LEDs
- Refrigerator replacement

- Window air conditioner replacement
- Waterbed mattress replacement
- HVAC filter replacement
- Electric dryer venting
- Clothesline installation
- Power strip/smart plug
- Dehumidifier replacement
- Appliance replacement, with PPL approval or with auditor demonstration of a 12-year payback
- CO detector
- Comfort measures

There are three types of WRAP services that customers may receive.

1. **Baseload:** Customers with no electric heat will receive this type of service. The standard baseload measures listed above and other measures that meet the PUC payback criteria are provided.
2. **Low Cost:** In addition to the baseload measures, customers with electric hot water are eligible for water heating measures that meet the PUC's payback criteria, including the following.
 - Water heater replacement
 - Gravity Film Exchange (GFX)
 - Repairs of plumbing leaks
 - Water pipe insulation
 - Showerheads/aerators
 - Heat pump water heater
 - Other measures that meet PUC payback criteria
3. **Full Cost:** Customers are eligible for full cost WRAP if the home has installed electric heat or when full cost measures will reduce electric energy usage. This may include homes with defacto electric heat and high cooling usage. Full cost jobs can be downgraded to baseload or low cost jobs if the home has less than 50 percent installed electric heat, if there is no opportunity to install heating measures, or for health and safety reasons. In addition to the baseload and water heating measures, they may receive the following measures that meet the PUC payback criteria.
 - Blower door guided air sealing
 - Attic, wall, and floor insulation
 - Sealing of attic bypasses
 - Attic vents and hatches
 - Crawl space and header insulation
 - Heating equipment repair, retrofit, or replacement
 - Duct insulation and repair
 - Caulking and weather-stripping

- Door sweeps
- Storm windows or window replacement
- Thermostat replacement or programmable thermostats
- Other measures that meet the PUC payback criteria

Eight of the service delivery organizations use PPL guidelines, their own formulas or methods, or published guidelines to assess measure payback. Two service delivery organizations said they could not determine this until after services had been provided.

PPL provides a shell allowance for the full cost jobs based on an aggregate payback formula that takes the customer's electric seasonal usage into account. Contractors can spend up to 30 percent beyond the shell allowance for incidental repairs; up to \$650 per home in diagnostic, health, and safety measures for heating jobs; and up to \$250 for comfort measures in low cost or baseload jobs. Contractors can exceed the health and safety allowances with PPL approval. They can also exceed the shell allowance for high priority measures with PPL approval, such as attic insulation and associated air sealing and electric heat repair.

Periodically, PPL pilots new products, measures, or techniques. Beginning in November 2016, PPL began replacing its existing residential meters in accordance with Act 129 requirements. The Advanced Metering Infrastructure (AMI) Team implemented a Home Area Network (HAN) Pilot in 2018 for 500 residential customers in conjunction with the new metering technology. A total of 61 LIURP customers participated in the pilot. The LIURP Team will continue to work with the AMI Group to explore the feasibility of a pilot specifically tailored to LIURP customers as part of its next Universal Service Plan.

In 2017, PPL implemented a Ductless Mini-Split Heat Pump Pilot for electric resistance heating and space heating customers. Overall, the pilot showed good savings and high customer satisfaction. This program was a useful option when a home had high usage but was already insulated and there were no other measures to install.

G. Contractors

PPL uses contractors to install weatherization measures and conduct audits, inspections, and energy education sessions. Contractors may use sub-contractors for specialized work including electrical, plumbing, and heating equipment repair. PPL assigns work to contractors based on customer need, location, skill sets, experience, and ability to handle increased workload.

Many of PPL's contractors have been working on WRAP since 1987. PPL issues three-year contracts with the opportunity for annual adjustments. To select contractors, PPL evaluates their pricing and conducts a cost comparison. The contractors must answer 20 different questions, one of which asks about the volume of work they can handle. PPL requires that contractors have previously worked with energy efficiency programs, which can include private industry work. Crew leaders, auditors, and inspectors must also have a BPI or state-equivalent certification.

PPL worked on revising its field standards manual for contractors in early 2017. Additionally, as part of a WRAP Contractor Survey in March 2016, some contractors requested periodic updates on program changes and best practices. In response, PPL started providing at least quarterly email updates on WRAP changes.

The contractors appear to work well with PPL and appreciate the support provided by PPL staff. All ten interviewed organizations reported that PPL is very helpful in their implementation of WRAP, that PPL provides the support that is needed, and that PPL staff are available to answer questions.

H. Training

PPL has a WRAP training budget and sponsors contractors to attend the annual Home Performance Conference, as well as other trainings and certification workshops. PPL also offers a training stipend to contractors who attend mandatory training.

WRAP organizations reported that they receive various types of training and professional development to help them provide services. Common trainings reported by the organizations were BPI certifications (usually Building Analyst certifications), attendance at the Home Performance Conference, and training at the National Sustainable Structures Center (NSSC). PPL also holds an annual meeting for contractors to discuss the program and provide updates on any changes. All interviewed organizations reported that their staff receive sufficient training.

I. Service Delivery

Each WRAP job receives an energy audit to determine which measures should be installed. Contractors decide which measures to install based upon the customer interview, the customer's electric usage history, on-site diagnostics, prioritization of measures, the PUC payback criteria, and coordination with other weatherization programs. Since their last three-year plan, PPL has implemented an installation limit of three appliances per home, though they will make exceptions for extenuating circumstances.

The following criteria are used for determining spending and measure selection:

1. **Baseload:** PPL has no limit on the amount of money spent on baseload measures in a home. However, measures must meet the PUC's payback criteria.
2. **Low Cost:** If a baseload customer has an electric water heater and has the potential for major water heating measures, PPL may upgrade the WRAP job to "low cost" at the time of the audit. Low cost measures must adhere to PUC payback criteria.
3. **Full Cost:** The PUC LIURP guidelines suggest a seven- or twelve-year payback for most measures. PPL assigns a "shell allowance" for each full cost job that serves as a spending guideline for full cost measures. Contractors are permitted to exceed the shell allowance for "high priority" measures, such as attic insulation and associated air

sealing, and electric heat repair. In addition to the shell allowance, contractors can perform the following work on full cost jobs.

- **Incidental Repairs** – Contractors can make small incidental repairs needed for the installation of other weatherization measures. The most common incidental repairs provided by interviewed WRAP providers are water leaks/plumbing repairs, reported by four organizations; drywall, ceiling, window and door framing and repairs, reported by three organizations; and electric repair/rewiring for insulation, reported by three organizations. Nine of the ten organizations reported that the incidental repairs allowance is sufficient.
- **Comfort Repairs** – Contractors can repair, replace or add (rare) electric heating equipment in homes where there is inadequate heat to maintain comfort. These cases will usually result in an increase in electric usage. As a result, PPL may not analyze them in the pre- to post-usage evaluation of WRAP.
- **Health & Safety** – Contractors are required to conduct combustion safety testing before applying air sealing or insulation to a home. Contractors may spend up to \$650 in diagnostic health and safety measures for heating jobs. If the cost of required health and safety measures exceeds this allowance, contractors are asked to use other funding sources such as the state weatherization program, gas utility funding, or crisis funding. If these funding sources are not available, PPL may provide the needed funding for the health and safety repairs. The most common health and safety measures provided by interviewed WRAP organizations are CO Detectors, provided by all organizations; and water heater repair/replacement, smoke alarms, and home ventilation, provided by five organizations each. Nine of the ten organizations felt that the current health and safety allowance is sufficient.
- **Municipal requirements** – Certain municipalities require permits for the installation of WRAP measures, such as water heater replacement. PPL also allows the installation of smoke alarms, water heating check valves, and water heating expansion tanks in accordance with municipal requirements, as needed to install WRAP measures. Additional municipal requirements are assessed by PPL on a case by case basis. Costs of municipal measures may not exceed the cost of the energy-saving measure.

After the audit, contractors can move ahead with measure installation if the measures do not exceed the cost allowance and the measures are on PPL's measure list. After a contractor enters and submits measures, LEAP builds an invoice based on the contractor's pre-populated contract prices. The USRs verify the invoices for accuracy and review for supporting documentation. The RPSs approve the invoices. LEAP sends a daily batch file of approved invoices to PPL's Financial Department for payment.

J. Energy Education

The goals of energy education are to empower customers to make good energy choices, to involve the customer in the process, and to help the customer understand the electric bill.

PPL asks customers who apply for WRAP to sign a consent form which authorizes PPL to do work on the customer's home and which states that the customer will actively participate in WRAP.

All WRAP participants receive at least one on-site energy education visit. The educator may review the customer's electric usage, discuss an energy savings plan, and have the customer complete an "Actions to Save" form. PPL has developed a comprehensive energy education booklet that is provided to the educators for use during energy education sessions.

Additional energy education is offered to customers with greater opportunities for usage reduction. The types of energy education that are offered are as follows.

1. Initial education session: The educator conducts the initial energy education session prior to the installation for measures, usually during the audit.
2. Follow-up education session: The quality assurance inspector provides follow-up education at the time of the inspection or within six months after the installation of measures by phone or in-person. The session includes a review of the installed measures, discussion of changes in electric use, and additional education on energy saving actions.
3. One-year follow-up: PPL developed and implemented a feedback mechanism for customers after the twelve-month post-WRAP period in 2017. When customer's usage increases or remains high, PPL will offer remedial energy education or a referral for additional WRAP services.

K. Program Coordination

Since implementing the LEAP database, PPL has been able to track coordination between WRAP and other weatherization programs. Service delivery for WRAP has been coordinated with the following programs.

- Act 129 – LEAP auto-refers cases to Act 129 or LIURP WRAP based on predetermined criteria. The Act 129 Low-Income system automatically refers electric heating jobs from Act 129 to WRAP once Act 129 work is completed. USRs will screen these jobs for WRAP eligibility. LEAP also refers Act 129 jobs to WRAP when customers have fewer than nine months of usage history in their home. These jobs may be referred for additional LIURP measures after Act 129 work is complete. WRAP jobs for which PPL is unable to obtain landlord consent are sent to Act 129.
- WAP – The LEAP database has a feature that allows for shared WAP/WRAP audits. If an organization administers both WRAP and WAP, they will try to serve the customer

through both programs if it works within the WAP priority list. If an organization does not have a WAP contract, they will tell the customer about the program and provide them with a referral to potentially receive WAP after WRAP services are completed. If a customer participates in WAP after WRAP is completed, PPL would usually not be able to track the coordination, unless the WAP participation occurred shortly after WRAP. Inequities in funding make coordination between the two programs difficult. Six of the ten interviewed service delivery organizations reported that they coordinate WRAP with WAP so that work is done for both programs during the same visit, though two of these organizations reported that they conduct separate audits for both programs.

- UGI's LIURP – Coordination with this program works the same as coordination with WAP. One of the unique challenges for UGI is defacto heating customers. UGI is considering a defacto heat pilot to serve gas customers that use extensive electric space heating. This program would consider replacing or repairing the customer's gas heating system. PPL would refer UGI with leads for these services.

Six of the ten interviewed service delivery organizations provide services for gas utility LIURP programs, and eight organizations provide services for WAP. Five of these use the same staff for WRAP and other utility programs, and six use the same staff for WRAP and WAP. These characteristics offer potential for increased program coordination.

Barriers to coordination include long waiting lists for state weatherization, lack of universal procedures between programs, and areas where PPL does not overlap with the gas program that the agency services.

PPL has proposed using the following methods for utility coordination.

- Initiate a quarterly contact with WAP staff and gas utilities.
- Monitor contractor coordination efforts through LEAP.
- Provide WAP contractors with WRAP applications.
- Participate in the WAP Advisory Council Meetings and related inter-utility projects.

L. Data and Reporting

PPL deployed its new database and reporting system, LEAP, in March 2015. This system replaced the fourteen-year-old WRAP database previously in use. The new system offers improved communications between PPL and contractors, data validation, enhanced workflow and budget management, and reduced paperwork. Both PPL staff and contractors reported that they have had positive experiences with the new database.

PPL deployed an updated database in May 2016 which focuses on LIURP/Act 129 Phase 3 coordination, improves invoicing functionality, and captures post-installation data for LIURP reporting. The following changes were made in the most recent re-design of LEAP.

- The system can track job coordination.

- Contractors can see if a customer is enrolled in OnTrack, how close they are to reaching the maximum credit, whether they are electric or non-electric heat, and their usage history. Contractors can also view a job after inspection and receive an automatic notation on their dashboard if a home did not pass inspection.
- Streamlined invoicing process. The invoicing system is now part of the program database and it is accessible via the internet.
- Streamlined inspection process. Inspections are now tracked in the database.
- Improved reporting. PPL can now track and report contractor turnaround times.
- Contracts and budgets are now managed in the LEAP database. Contractors can also use the database to view their own work and budget.

All organizations reported that they regularly track statistics to monitor their performance on WRAP. Common metrics tracked by each organizations are expenditures and billing, the number of pending and completed jobs, energy savings, performance data, and the time between case assignment and case closing/invoicing.

M. Quality Control

PPL targets a minimum of 30 percent of full cost jobs for a site inspection. PPL's third-party inspector also conducts phone inspections for at least 25 percent of baseload and low cost jobs. The inspections obtain customer satisfaction data and ensure that services are delivered in accordance with WRAP standards, identify major missed opportunities, and adhere to priority lists. Issues or concerns are recorded on an inspection action sheet and contractors have 30 days to respond to any issues.

Nine of the ten service delivery organizations that were interviewed reported that their work had been inspected by PPL's third-party inspector (the tenth contractor primarily conducts inspections for PPL). Five of the nine organizations reported that they have found the inspector's feedback to be helpful. The remaining four organizations said they have not received enough feedback to say whether the inspector is helpful. Only one organization reported that they ever disagree with the third-party inspector's findings, and this occurs less than ten percent of the time.

PPL conducts performance reviews with their WRAP contractors at least once a year. They evaluate the contractors on their job turn-around time, work quality, cost-effectiveness, and customer satisfaction. They also discuss the contractor's savings statistics. The performance review provides contractors with the opportunity to express any problems and concerns and to make suggestions for program improvement. Additionally, PPL staff or a designated home performance specialist will perform periodic field observations of auditors, crew leaders, and energy educators.

PPL may request additional meetings and/or training for contractors that do not meet WRAP requirements. If performance does not improve, PPL may terminate the WRAP contract.

N. Program Statistics

The table below on program expenditures is based on PPL reports to the PUC. The table shows that total WRAP expenditures were close to \$10 million in 2016 and 2017.

**Table V-2
WRAP Expenditures**

	2016	2017
Administration	\$1,282,569	\$ 1,059,350
Field Support	\$364,202	\$ 243,853
Inspections	\$110,500	\$ 135,725
No Measures Installed Costs	\$48,314	\$ 25,344
Health and Safety	\$352,071	\$ 630,236
Coordinated Jobs	\$71,544	\$84,900
Measures	\$7,630,440	\$7,805,503
Total	\$9,859,640	\$9,984,911

Table V-3 shows that approximately 3,500 to 4,000 customers are served each year. While about 30 to 40 percent received baseload services, 20 percent received low cost services, and 40 to 50 percent received full cost services.

**Table V-3
WRAP Participants**

Job Type	2016		2017		2018	
	Number	Percent	Number	Percent	Number	Percent
Baseload	1,270	37%	1,029	27%	1,196	30%
Low Cost	707	20%	803	21%	932	24%
Full Cost	1,480	43%	1,970	52%	1,823	46%
Total	3,457	100%	3,802	100%	3,951	100%

Table V-4 displays WRAP measure penetration rates for baseload jobs. The most common measures typically considered baseload were lighting (93% in 2018), health and safety (72% in 2018) refrigerators (49% in 2018), and air conditioners (20% in 2018).

**Table V-4
WRAP Baseload Jobs
Measure Penetration Rates**

	2016	2017	2018
Observations	1,272	1,027	1,205
Air Sealing	2%	2%	5%
Appliances			
Air Conditioner Repair/Replacement	28%	22%	20%
Dehumidifier	5%	5%	5%
Other Appliance	10%	12%	10%
Refrigerator/Freezer Repair/Replacement	49%	48%	49%
Audit	98%	99%	99%
Doors	8%	12%	13%
HVAC	1%	1%	1%
Health and Safety	76%	70%	72%
Lighting	89%	94%	93%
Miscellaneous	18%	18%	30%
Miscellaneous Baseload	42%	39%	33%

Table V-5 displays WRAP measure penetration rates for low cost jobs. The table shows that the most common measures for low cost jobs in 2018 were as follows.

- 92% received lighting
- 82% received health and safety measures
- 62% received refrigerators
- 59% received aerators or showerheads
- 55% received hot water heater insulation
- 47% received water heater replacement

**Table V-5
WRAP Low Cost Jobs
Measure Penetration Rates**

	2016	2017	2018
Observations	708	800	945
Air Sealing	3%	6%	9%
Appliance			
Air Conditioner Repair/Replacement	41%	34%	34%
Dehumidifier	6%	5%	6%
Other Appliance	8%	11%	13%

	2016	2017	2018
Refrigerator/Freezer Repair/Replacement	61%	59%	62%
Attic Insulation	0%	1%	2%
Audit	99%	99%	97%
Doors	11%	27%	33%
HVAC	2%	5%	5%
Health and Safety	78%	77%	82%
Heat Pump Water Heater	11%	5%	8%
Lighting	88%	91%	92%
Miscellaneous	29%	40%	50%
Miscellaneous Baseload	58%	71%	68%
Wall Insulation	0%	1%	2%
Water Heating			
Aerators & Showerheads	60%	62%	59%
DHW Insulation	46%	42%	55%
DHW Repair	15%	33%	42%
DHW Temp Setback	3%	2%	3%
Water Heater Replacement	49%	46%	47%

Table V-6 displays WRAP measure penetration rates for full cost jobs. The table shows that the most common measures for full cost jobs in 2018 were as follows.

- 92% received lighting
- 71% received air sealing
- 68% received health and safety measures
- 61% received doors
- 54% received HVAC work
- 53% received attic insulation
- 39% received refrigerators

**Table V-6
WRAP Full Cost Jobs
Measure Penetration Rates**

	2016	2017	2018
Observations	1,490	2,030	1,832
Air Sealing	71%	73%	71%
Appliance			
Air Conditioner Repair/Replacement	21%	23%	23%
Dehumidifier	7%	8%	8%

	2016	2017	2018
Other Appliance	9%	21%	13%
Refrigerator/Freezer Repair/Replacement	43%	41%	39%
Attic Insulation	49%	53%	53%
Audit	98%	99%	98%
Doors	62%	59%	61%
Floor Insulation	18%	18%	18%
Garage Insulation	1%	1%	1%
HVAC	44%	53%	54%
Health and Safety	56%	60%	68%
Heat Pump Water Heater	11%	6%	7%
Lighting	87%	92%	92%
Miscellaneous	32%	28%	32%
Miscellaneous Baseload	53%	60%	57%
Miscellaneous Repairs	23%	22%	25%
Mobile Home	2%	2%	2%
Wall Insulation	20%	19%	17%
Water Heating			
Aerators & Showerheads	37%	38%	36%
DHW Insulation	28%	28%	28%
DHW Repair	14%	16%	21%
DHW Temp Setback	1%	1%	1%
Water Heater Replacement	30%	25%	30%
Windows	24%	20%	23%

O. Program Performance

PPL's annual WRAP evaluation for the PUC estimated savings of 10.5 percent for baseload jobs, and 10.4 percent for low cost and full cost jobs in 2017. Many utilities have seen savings decline significantly over the past several years as many of the highest low-income energy users have already received program services. PPL's savings compare positively to other electric utilities as shown in the Pennsylvania Public Utility Commission, Bureau of Consumer Services' 2018 Report on Universal Service Programs and Collections Performance. This report shows average LIURP savings of 7.7 percent for electric baseload, 11.1 percent for electric water heating, and 9.3 percent for electric heating for 2016.⁵

⁵ http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf

**Table V-7
PPL Estimated WRAP Savings**

	WRAP Savings					
	2015		2016		2017	
	kWh	%	kWh	%	kWh	%
Baseload	1,110	10.5%	1,250	11.2%	1,522	10.5%
Low Cost	1,801	12.9%	1,848	12.6%	1,826	10.4%
Full Cost	2,072	11.3%	2,002	10.1%	2,323	10.4%

P. Challenges

PPL reported the following challenges in the WRAP program.

- **Customer Cooperation** – PPL has sufficient leads for WRAP, but some customers are reluctant to participate in the program or cooperate with the scheduling process in a timely manner. This could be due in part to the automatic referrals from OnTrack, as these customers are not initiating communication with a representative and may not understand the benefits of WRAP.
- **Landlord Contact Information** – PPL faces challenges obtaining landlord contact information from customers. Once they receive contact information, PPL secures landlord approval for approximately 70 percent of the customers.
- **Education** – The online applications and automatic referrals have made it more difficult for customers to understand both OnTrack and WRAP because they do not have direct interaction with a PPL staff member. Some customers who apply for OnTrack and then are also enrolled in WRAP do not understand the difference between the two programs.
- **Coordination** – Coordination continues to be a challenge. However, several of the service delivery organizations provide additional utility programs and/or WAP and felt that there are opportunities for improved coordination.

VI. Needs Assessment

This section provides a profile of low-income households in PPL's service territory using data from the 2015-2017 American Community Survey (ACS). These data provide information on the number of eligible households, the poverty level of those households, demographic characteristics, and energy burden. The data represent PPL's service territory in 2017.

A. PPL Service Territory

Table VI-1 displays the counties in PPL's service territory, the ACS estimate of the number of households in the county, the number of PPL's residential customers, the percent of the households served by PPL, and an indicator of whether or not the county was included in the analysis. Counties with at least 50 percent of the households served by PPL were included in the analysis. The seven county groups excluded had less than 20 percent of the households served by PPL.

The ACS data is organized in Public Use Microdata Areas (PUMAs), which sometimes include more than one county. Counties were combined in the table below when they were contained together in one ACS PUMA and could not be separately analyzed.

Table VI-1
Counties in PPL's Service Territory

Counties Served by PPL	ACS Household Estimate	PPL Residential Customers	Percent Served by PPL	County Included in Analysis
Berks	152,449	30,274	19.9%	No
Bradford, Sullivan, and Tioga	41,571	25	0.1%	No
Bucks	235,992	26,774	11.4%	No
Carbon, Lehigh, and Northampton	276,580	234,620	84.8%	Yes
Chester	188,271	5,094	2.7%	No
Clinton, Lycoming	60,085	60,050	99.9%	Yes
Columbia, Luzerne	152,421	117,221	76.9%	Yes
Cumberland, Perry	114,846	105,330	91.7%	Yes
Dauphin	110,915	108,320	97.7%	Yes
Juniata, Mifflin, Snyder, Union	56,343	32,108	57.0%	Yes
Lackawanna, Wyoming	95,689	87,634	91.6%	Yes
Lancaster	198,553	193,929	97.7%	Yes
Lebanon	52,376	2,884	5.5%	No
Monroe	56,878	57,312	100%	Yes
Montgomery	312,517	20,197	6.5%	No
Montour, Northumberland	45,875	46,956	100%	Yes
Pike, Susquehanna, Wayne	54,955	53,374	97.1%	Yes

Counties Served by PPL	ACS Household Estimate	PPL Residential Customers	Percent Served by PPL	County Included in Analysis
Schuylkill	57,678	60,523	100%	Yes
York	169,112	7,681	4.5%	No

Table VI-2 displays the number of households in the analyzed area with electric service, no electric service, electric heating service, and non-heating electric service. The table shows that 94 percent have direct electric service, while the remaining six percent do not have direct electric utility accounts because their utilities are included in their rent or because they used no electricity. The majority of these households, 66 percent, do not heat with electricity.

Table VI-2
Distribution of Service Status for Households in Selected Area

Service Status	Number	Percent
Electric Service	1,209,173	94%
No Electric Service	71,646	6%
Heating Service	368,072	29%
Non-Heating Service	841,101	66%
All Households	1,280,819	100%

PPL has defined five regions within their service territory, shown in Table VI-3. The table shows how the counties are assigned to region. Carbon is included in the Lehigh region instead of the Northeast region indicated by PPL because the majority of the households in that PUMA are included in the Lehigh region, and counties within one PUMA cannot be separated. Other counties have similarly been reassigned as necessary.

Table VI-3
Regions in PPL's Service Territory

Region	Counties
Harrisburg	Cumberland, Dauphin, Perry
Lancaster	Lancaster
Lehigh	Carbon, Lehigh, Monroe, Northampton
Northeast	Columbia, Lackawanna, Luzerne, Pike, Schuylkill, Susquehanna, Wayne, Wyoming
Susquehanna	Clinton, Juniata, Lycoming, Mifflin, Montour, Northumberland, Snyder, Union

Table VI-4 displays the number and percent of households in each region with direct electric service, heating service, and non-heating service. Approximately 21 percent of households

in the Northeast region have electric heating service compared to the roughly 33 percent in Harrisburg, Lancaster, and Lehigh that have electric heating service.

**Table VI-4
Distribution of Service Type for Households in PPL Service Territory
By Region**

County	Electric Service		Heating Service		Non-Heating Service	
	Number	Percent	Number	Percent	Number	Percent
Harrisburg	215,257	95%	75,924	34%	139,334	62%
Lancaster	182,379	92%	66,119	33%	116,260	59%
Lehigh	318,123	95%	111,075	33%	207,047	62%
Northeast	341,039	95%	76,141	21%	264,898	73%
Susquehanna	152,376	94%	38,813	24%	113,562	70%
Total	1,209,173	94%	368,072	28%	841,101	66%

B. Income Eligibility

While eligibility for OnTrack is 150 percent of the Federal Poverty Level, eligibility for WRAP is 200 percent of poverty. Table VI-5 displays the number and percent of households with electric service, electric heating service, and non-heating electric service who have income at or below 150 percent and 200 percent of the poverty level. The table shows that approximately 17 percent of households with electric service have income below 150 percent and roughly 26 percent have income below 200 percent.

**Table VI-5
Income Eligibility Rate by Service Status**

Service Status	All Households	150% Poverty Level		200% Poverty Level	
		Number	Percent	Number	Percent
Electric Service	1,209,173	205,784	17%	313,857	26%
Heating Service	368,072	72,328	20%	103,028	28%
Non-Heating Service	841,101	133,456	16%	210,828	25%

Table VI-6 displays the number and percent of households who are income-eligible by region. The table shows the eligibility at 150 percent of poverty ranges from 13 percent in the Harrisburg region to 20 percent in the Northeast region and eligibility at the 200 percent level ranges from 21 percent in the Harrisburg region to 30 percent in the Northeast and Susquehanna regions.

**Table VI-6
Income Eligibility Rate by Region**

County	150% Poverty Level		200% Poverty Level	
	Number	Percent	Number	Percent
Harrisburg	28,822	13%	45,228	21%
Lancaster	27,154	15%	42,987	24%
Lehigh	51,688	16%	77,554	24%
Northeast	69,397	20%	103,135	30%
Susquehanna	28,723	19%	44,952	30%
Total	205,784	17%	313,857	26%

Table VI-7 provides a breakdown of households who are income-eligible by poverty level. Approximately one third have income below the poverty level, between 101 and 150 percent of the poverty level and between 151 to 200 percent of the poverty level. Households with electric heating service are more likely than those with non-heating electric service to have income below 100 percent of the poverty level.

**Table VI-7
Distribution of Income-Eligible Households
By Service Type and Poverty Group**

Poverty Group	Electric Service		Heating Service		Non-Heating Service	
	Number	Percent	Number	Percent	Number	Percent
0% -50%	40,233	13%	15,112	15%	25,121	12%
51% -100%	67,653	22%	24,233	24%	43,420	21%
101% -150%	97,898	31%	32,982	32%	64,916	31%
151%-200%	108,073	34%	30,701	30%	77,372	37%
Total	313,857	100%	103,028	100%	210,828	100%

Table VI-8 provides a breakdown of households who are income eligible by poverty level and region. There is only slight variability in the distribution across regions.

**Table VI-8
Distribution of Income-Eligible Households with Electric Service
By Poverty Group and Region**

Poverty Group	Region									
	Harrisburg		Lancaster		Lehigh		Northeast		Susquehanna	
	N	%	N	%	N	%	N	%	N	%
0% -50%	6,094	13%	4,773	11%	10,280	13%	13,735	13%	5,350	12%
51% -100%	9,768	22%	9,617	22%	16,291	21%	22,145	21%	9,831	22%
101% -150%	12,960	29%	12,763	30%	25,117	32%	33,517	33%	13,541	30%
151%-200%	16,406	36%	15,834	37%	25,866	33%	33,738	33%	16,229	36%
Total	45,228	100%	42,987	100%	77,554	100%	103,135	100%	44,952	100%

C. Demographics

This section provides data on the demographic characteristics of income-eligible households in PPL’s service territory. The table shows that of those households at or below the 200 percent poverty level, about 14 percent are married with children, 21 percent are single with children, 36 percent have a senior head of household, and 29 percent have another household arrangement type.

**Table VI-9
Household Type for Income-Eligible Households**

Household Type	Electric Service 150% of Poverty		Electric Service 200% of Poverty	
	Number	Percent	Number	Percent
Married with children	25,120	12%	43,204	14%
Single with children	48,152	23%	64,420	21%
Senior head of household	68,272	33%	113,704	36%
Other	64,240	31%	92,529	29%
Total	221,157	100%	336,876	100%

Table VI-10 displays the language spoken by income-eligible households in PPL’s service territory. The table shows that about 82 percent speak English, 13 percent speak Spanish, three percent Indo-European, and two percent other languages.

Table VI-10
Language Spoken by Income-Eligible Households

Language	Electric Service 150% of Poverty		Electric Service 200% of Poverty	
	Number	Percent	Number	Percent
English	168,069	82%	258,336	82%
Spanish	26,953	13%	38,033	12%
Indo-European	6,197	3%	10,507	3%
Other	4,566	2%	6,981	2%
Total	205,784	100%	313,857	100%

Table VI-11 displays the language spoken at home by region for households with income at or below 200 percent of the poverty level. There is considerable variation in languages across the regions. While only two percent of households in the Susquehanna region speak Spanish, 24 percent speak Spanish in the Lehigh region.

Table VI-11
Language Spoken by Income-Eligible Households by Region
Income Eligible at 200% of Poverty

Language	Households with Electric Service									
	Region									
	Harrisburg		Lancaster		Lehigh		Northeast		Susquehanna	
	N	%	N	%	N	%	N	%	N	%
English	38,337	85%	32,157	75%	53,659	69%	91,649	89%	42,534	95%
Spanish	3,813	8%	7,411	17%	18,269	24%	7,801	8%	738	2%
Indo-European	1,683	4%	2,200	5%	2,419	3%	2,641	3%	1,565	3%
Other	1,394	3%	1,219	3%	3,207	4%	1,045	1%	115	<1%
Total	45,228	100%	42,987	100%	77,554	100%	103,135	100%	44,952	100%

D. Energy Bills and Burden

This section examines the energy bills and burden for low-income households in PPL's service territory. Table VI-12 displays mean energy bills and energy burden for income-eligible households with non-heating and heating accounts. The table shows that mean burden is nine percent for non-heating households at or below 150 percent of the poverty level and six percent for non-heating households at or below 200 percent of the poverty level. Heating households have average burdens of 13 percent and ten percent for the two eligibility groups respectively.

Table VI-12
Mean Energy Bills and Burden for Income-Eligible Households

Service Status	150% of Poverty			200% of Poverty		
	Number	Energy Expenditures	Energy Burden	Number	Energy Expenditures	Energy Burden
Non-Heating	133,456	\$1,384	9%	210,828	\$1,399	6%
Heating	72,328	\$1,967	13%	103,028	\$2,009	10%
Total	205,784	\$1,589	10%	313,857	\$1,599	8%

Table VI-13 displays the mean bills and burden for eligible households by region. Electric heating households in the Lancaster region have lower energy burdens than households in the other regions.

Table VI-13
Mean Energy Bills and Burden for Income-Eligible Households
By Region

Poverty Group	Region									
	Harrisburg		Lancaster		Lehigh		Northeast		Susquehanna	
	\$	Burden	\$	Burden	\$	Burden	\$	Burden	\$	Burden
150% of Poverty										
Non-Heating	\$1,397	9%	\$1,461	8%	\$1,577	9%	\$1,236	8%	\$1,395	9%
Heating	\$1,704	13%	\$1,825	11%	\$2,168	13%	\$2,024	15%	\$1,856	14%
200% of Poverty										
Non-Heating	\$1,425	7%	\$1,499	6%	\$1,551	7%	\$1,260	6%	\$1,411	7%
Heating	\$1,786	9%	\$1,851	8%	\$2,238	11%	\$2,019	11%	\$1,936	10%

E. Summary

This section provided an analysis of the characteristics of customers who are eligible for PPL's Universal Service Programs. Key findings from this research are summarized below.

- *Service Type:* The majority of households have non-heating electric service. Households in the Lancaster, Lehigh, and Harrisburg regions are more likely than those in other regions to have electric heating service. These customers may be more likely to be served as heating jobs by WRAP.
- *Income Eligibility:* While 17 percent of households are eligible at the 150 percent of poverty level, 26 percent are eligible at the 200 percent level. Households in the Northeast and Susquehanna regions are more likely to be income eligible than households in the other regions.

- *Language:* Approximately 18 percent of income-eligible households speak a language other than English at home, and approximately 12 percent speak Spanish at home. Households in the Lancaster and Lehigh regions are more likely than households in the other regions to speak Spanish at home. Agencies in these regions should have the ability to communicate with Spanish-speaking households.
- *Energy Burden:* Energy burden averaged nine percent for electric non-heating households and 13 percent for electric heating households at or below 150 percent of the poverty level. Households in the Lancaster region had lower energy burdens than households in the other regions.

VII. OnTrack Participant Feedback

APPRISE conducted a survey with OnTrack participants to assess customers' understanding of OnTrack, the impact of OnTrack, and customer satisfaction with the program. This section of the report provides a summary of the methodology and findings from this survey.

A. Methodology

This section describes the sample and outlines the survey implementation procedures. Survey response and cooperation rates are also included in this section.

Sample

A sample of 450 current OnTrack participants was randomly selected from all current OnTrack participants with usable phone numbers.

Survey Implementation

APPRISE sent an advance letter to all customers in the selected sample. The letter notified potential participants that they would be called to participate in the survey, explained the purpose of the survey, and provided the option to call a toll-free number to complete the survey at their convenience.

APPRISE staff conducted the telephone survey between August 26 and September 16, 2019. A combination of daytime, evening, and weekend calling hours were made to increase opportunities for participation. Managers from APPRISE trained staff on the survey instrument and how to use a computerized version of the survey to record responses. Training included an introduction to the sample population, an explanation of field codes and questions included in the survey instrument, and an in-depth discussion of survey questions that required special attention.

Cooperation and Response Rates

Table VII-1 provides a summary of sample response rate statistics. The response rate was 47 percent. Of the customers who we were able to reach, 89 percent agreed to complete the survey. Overall, surveys were conducted with 34 percent of the sample.

**Table VII-1
Final Dispositions**

Disposition	Total
Selected Sample	450
No Answer/Busy/Voicemail	181
Non-Working Phone /Wrong Number	71
Refused	19
Hearing/Language Barrier	21

Disposition	Total
Too Ill to Participate	1
Not Eligible	3
Completed Interviews	154
Completed Interview Rate	34%
Cooperation Rate	89%
Response Rate	47%

B. Findings

This section provides a summary of the findings from the survey in the following areas.

- Demographics
- Reasons for Participation and Enrollment
- Understanding/Impact/Usage
- Continued Program Participation
- Satisfaction

Demographics

This section provides demographic information collected from participants.

Participants were asked whether they own or rent their home. Table VII-2 shows that 78 percent of the participants said they were renters and 22 percent said they were homeowners.

**Table VII-2
Home Ownership**

Do you own or rent your home?	
Observations	154
Own	22%
Rent	78%
Total	100%

Participants were asked if they or anyone in their household had a disability. Table VII-3 shows that just less than half of all of households surveyed included a disabled member.

**Table VII-3
Households with a Disabled Member**

Is anyone in your household disabled?	
Observations	154
Yes	49%
No	51%
Total	100%

Respondents were asked about their marital status. Table VII-4 shows that 23 percent of respondents indicated that they were married.

**Table VII-4
Marital Status**

What is your marital status?	
Observations	154
Married	23%
Not Married	77%
Total	100%

Participants were asked to indicate the highest level of education attained by any member of the household. Table VII-5 shows that 61 percent of respondents reported that a high school education or less was the highest level of education that had been attained in the home. Twenty-four percent indicated that someone in their home had received some college or attained an associate’s degree, and 11 percent said that someone in their home had attained a bachelor’s degree or higher.

**Table VII-5
Education Level**

What is the highest level of education reached by you or any member of your household?	
Observations	154
Less than High School	16%
High School Diploma or Equivalent	45%
Some College / Associates Degree	24%
Bachelor’s Degree	10%
Master’s Degree or Higher	1%
Vocational Training	2%
Don’t Know	1%

What is the highest level of education reached by you or any member of your household?	
Refused	1%
Total	100%

Participants were asked a series of questions to determine the sources of income for their household over the past 12 months. Table VII-6 shows that 41 percent of respondents received income from employment and 23 percent received retirement income. While 44 percent said that they had received TANF or some other form of cash assistance, 68 percent said they had been on food stamps or lived in public/subsidized housing.

Table VII-6
Income Sources

In the past 12 months, did anyone in your household receive income from...?	
Observations	154
Employment / Self-Employment	41%
Retirement Funds / Social Security	23%
TANF / SSI / SSDI / General Assistance	44%
Food Stamps / Public Housing	68%
Refused	<1%

*Some participants provided more than one response.

Participants were asked whether they or anyone in their household had been unemployed and looking for work over the past 12 months. Table VII-7 shows that 27 percent of the respondents indicated that someone in their household had been unemployed.

Table VII-7
Unemployed and Looking for Work

In the past 12 months, were you or anyone in your household unemployed and looking for work?	
Observations	154
Yes	27%
No	71%
Don't Know	1%
Refused	<1%
Total	100%

Table VII-8 displays the annual household income ranges reported by respondents. Fifty-five percent of respondents reported annual income at or below \$20,000 and nearly 20 percent said that they did not know their household's annual income.

**Table VII-8
Annual Household Income**

What is your household's annual income?	
Observations	154
≤\$5,000	5%
\$5,001 - \$10,000	17%
\$10,001 - \$15,000	20%
\$15,001 - \$20,000	12%
\$20,001 - \$25,000	5%
\$25,001 - \$30,000	12%
\$30,001 - \$35,000	1%
\$35,001 - \$40,000	5%
>\$40,000	3%
Don't Know	19%
Refused	1%
Total	100%

Reasons for Participation and Enrollment

This section includes information about the reasons participants decided to enroll in OnTrack and their overall experience with the enrollment process.

Participants were asked whether or not they were currently participating in PPL's OnTrack Program. Table VII-9 shows that 98 percent of the respondents confirmed that they were currently enrolled in the program.

**Table VII-9
OnTrack Participation Status**

Are you currently participating in the OnTrack Program? If no, have you ever participated in the OnTrack Program?	
Observations	157
Current Participant	98%
Past Participant	2%
Total	100%

Participants were asked how they had learned about the OnTrack Program. Table VII-10 shows that 29 percent said they had heard about the program through a friend or relative, 24 percent said they had discussed the program with a PPL Customer Service Representative, and 23 percent said they had been given information about the program at an agency.

**Table VII-10
OnTrack Information Source**

How did you find out about the OnTrack Program?	
Observations	154
Friend or Relative	29%
PPL Customer Service Representative	24%
Agency	23%
PPL Bill Insert / Brochure	9%
PPL Website / Internet Search	3%
On the Program in the Past	2%
Other	4%
Don't Know	11%

*Some participants provided more than one response.

Respondents were asked why they decided to enroll in the OnTrack Program. Table VII-11 shows that 74 percent said they had enrolled to reduce their energy bills, 20 percent said that this decision was related to the fact that their household had a limited or fixed income, and 11 percent said they enrolled to reduce the amount owed to PPL.

**Table VII-11
Reasons for Enrollment**

Why did you decide to enroll in the OnTrack Program?	
Observations	154
Reduce Energy Bills	74%
Limited or Fixed Income	20%
Reduce Arrearages	11%
Unemployment	4%
Budget Billing	3%
Prevent Service Shutoff	2%
Other	2%
Don't Know	1%

*Some participants provided more than one response.

Respondents were asked how they enrolled in OnTrack. Table VII-12 shows that 36 percent said that they enrolled at an agency, 35 percent said they enrolled over the phone, 11 percent said they applied by mail, and ten percent said they applied online. This represents a sample of current OnTrack participants, some of whom enrolled in OnTrack several years ago. PPL reported that currently participants are much more likely to apply online.

**Table VII-12
Method of Enrollment**

How did you enroll in OnTrack?	
Observations	154
At an Agency	36%
Over the Phone	35%
By Mail	11%
Online	10%
Other	1%
Don't Know	6%
Total	100%

Participants were asked how they had submitted their proof of income and other required documents necessary to enroll in OnTrack. Table VII-13 shows that 43 percent said they submitted their documents by mail and 34 percent said they submitted these documents in person. Other methods, such as uploading to the internet, email, or fax were all indicated by less than ten percent of the respondents.

**Table VII-13
Method of Submission of Required Documents**

How did you submit your proof of income and other required documents?	
Observations	154
By Mail	43%
In Person	34%
Uploaded to the Internet	7%
Attached to Email	5%
By Fax	4%
Other	2%
Don't Know	6%
Total	100%

Respondents were asked whether or not they had ever recertified for OnTrack. Table VII-14 shows that 50 percent of respondents reported that they had recertified.

**Table VII-14
Recertifying for OnTrack**

Have you ever recertified for OnTrack?	
Observations	154
Yes	50%
No	42%
Don't Know	8%
Total	100%

Participants were asked about the level of difficulty they experienced when enrolling in and recertifying for OnTrack. Table VII-15 shows that 93 percent of respondents said that their initial enrollment had either been somewhat or very easy. Among the 77 participants who recertified, 91 percent said that it had been somewhat or very easy to do so. Only one percent said enrollment was very difficult and no respondents said that recertification was very difficult.

**Table VII-15
Difficulty of Enrollment & Recertification**

How easy or difficult was it to enroll in the OnTrack Program? How easy or difficult was it to recertify?		
	Enrollment	Recertification
Observations	154	77
Very Difficult	1%	0%
Somewhat Difficult	5%	8%
Somewhat Easy	29%	18%
Very Easy	64%	73%
Don't Know	2%	1%
Total	100%	100%

Participants who indicated that enrolling in or recertifying for OnTrack had been difficult were asked what components of the enrollment or recertification process had caused the difficulty.

Among participants who said that initial enrollment had been difficult, 50 percent said that they had a hard time completing the application, 38 percent said they had trouble providing proof of income, and another 38 percent said that it had been difficult managing their expenses during the long period of time that they had to wait to hear back from the program.

Participants who said that enrollment or recertification were difficult were asked what parts of the process were difficult. The eight respondents provided the following responses about enrollment.

- 4 respondents said completing the application.
- 3 respondents said providing proof of income.
- 3 respondents cited the wait time.

The six participants who said recertification was difficult said the following parts were an issue.

- Providing proof of income.
- Learned late that it was required, which made it difficult to submit everything on time.
- Changing the address due to a move.
- Confusing information about WRAP.

Respondents were asked to report on their overall satisfaction with the OnTrack application process. Table VII-16 shows that 81 percent were very satisfied and 14 percent were somewhat satisfied. Only four percent said they were somewhat or very dissatisfied.

Table VII-16
Satisfaction with OnTrack Application Process

How satisfied were you with the application process, including providing required documents?	
Observations	154
Very Satisfied	81%
Somewhat Satisfied	14%
Somewhat Dissatisfied	1%
Very Dissatisfied	3%
Don't Know	1%
Total	100%

Program Understanding, Impact, and Usage

This section includes information about participants' understanding of OnTrack and changes in their usage and bill payment experiences before and after joining the program.

Participants were asked whether they felt they had a good understanding of the services provided by OnTrack. Table VII-17 shows that 94 percent of respondents said they felt they had a good understanding of program services.

Table VII-17
Understanding of OnTrack Services

Do you feel you have a good understanding of the services provided by PPL's OnTrack Program?	
Observations	154
Yes	94%
No	5%
Don't Know	1%
Total	100%

Respondents were asked to explain their responsibility in OnTrack. Table VII-18 shows that 83 percent of respondents said that participants are expected to keep up with their PPL payments and 12 percent said that they had a responsibility to reduce their energy usage. Other respondents said that they had a responsibility to keep their income information up to date, accept weatherization services, or recertify for the program when necessary.

Table VII-18
Understanding of Participant Responsibility in OnTrack

What is your understanding of your responsibility in this program?	
Observations	154
Keep Up with Payments	83%
Conserve Energy / Reduce Electric Use	12%
Keep PPL Updated on Income	5%
Accept Weatherization Services	3%
Re-Certify When Necessary	2%
Other	6%
Don't Know	9%

*Some participants provided more than one response.

Participants were asked to indicate what they felt were the benefits of the OnTrack Program. Table VII-19 shows that before prompting 68 percent said that lower energy bills were a benefit, 19 percent said that having even monthly payments was a benefit, ten percent said that preventing shutoff was a benefit, and eight percent said that arrearage forgiveness was a benefit. When asked specifically about the individual benefits, 97 percent agreed that having even monthly payments, 96 percent agreed that lower energy bills, 86 percent agreed that monthly bill credits, and 82 percent agreed that arrearage forgiveness were benefits.

When asked what they felt was the most important benefit of the program, 58 percent indicated that having lower energy bills was most important and 25 percent said that the most important benefit was having even monthly payments.

**Table VII-19
OnTrack Program Benefits**

What do you feel are the benefits of the OnTrack program? Do you think reduced bills/monthly bill credits/arrearage forgiveness/even monthly payments are a benefit of the program? What do you feel is the most important benefit of the program?			
	Unprompted	Prompted	Most Important
Observations	154	154	154
Lower Energy Bills	68%	96%	58%
Even Monthly Payments	19%	97%	25%
Monthly Bill Credits	N/A	86%	1%
Reduced Arrearages	8%	82%	4%
Preventing Service Disconnection	10%	N/A	6%
Access to Weatherization or LIURP	6%	N/A	2%
Other	5%	N/A	0%
Don't Know	10%	0%	4%

*Some participants provided more than one response.

Respondents were asked to report the amount that OnTrack saves them on a typical monthly electric bill. Table VII-20 shows that 23 percent reported monthly savings of over \$100, 23 percent reported monthly savings of \$51 to \$100, 12 percent report savings of \$26 to \$50, and four percent reported lower monthly savings. However, 38 percent said that they did not know the amount of their monthly OnTrack savings.

**Table VII-20
Monthly Savings Due to OnTrack**

How much money does OnTrack save you on a typical monthly electric bill?	
Observations	154
\$0	1%
\$1-\$25	3%
\$26-\$50	12%
\$51-\$100	23%
>\$100	23%
Don't Know	38%
Total	100%

Respondents were asked a series of question to assess the impact of the maximum credit.

- 51 percent of respondents indicated that they were aware of the maximum benefit limit.
- 42 percent said that they had received a letter from PPL reminding them of the credit limit.

- Among the 64 participants that received the PPL letter, 70 percent indicated that they had changed how they use energy as result of the information conveyed in the letter.

**Table VII-21
OnTrack Maximum Benefit**

Are you aware that there is a maximum amount of benefits that you can receive in a year from OnTrack? Have you ever received a letter from PPL stating that you had used a certain amount of your benefits and reminding you of the limit? Have you changed how you use energy because of this limit or because you received the letter from PPL?			
	Aware of Maximum	Received PPL Letter	Changed Usage
Observations	154	154	64
Yes	51%	42%	70%
No	43%	47%	25%
Don't Know	6%	11%	5%
Total	100%	100%	100%

Participants who said that they had changed their energy usage habits as a result of PPL's maximum benefit letter were asked what kind of usage habits they had changed. The 45 respondents provided the following information.

- 62 percent reported that they turn off lights when not in use.
- 56 percent reported that they conserve energy more generally
- 40 percent reported that they turn off or unplug appliances when not in use.
- Other responses included adjusting the thermostat, transitioning to LEDs, and participating in a weatherization program.

**Table VII-22
Customer Changed Usage Behavior as a Result of PPL Letter**

How have you changed the way you use energy?	
Observations	45
Turn Off Unneeded Lighting	62%
Conserve Energy	56%
Turn Off Appliances When Not in Use	40%
Turn Thermostat Up/Down in Winter/Summer	27%
Use LEDs	22%
Participated in a Weatherization Program	11%
Use Less Hot Water	2%
Other	7%

*Some participants provided more than one response.

Respondents were asked whether they received Arrearage Forgiveness credits from OnTrack. Table VII-23 shows that 27 percent of respondents said that they did receive arrearage forgiveness credits. A large group, 37 percent, said that they did not know whether or not they had received arrearage forgiveness from the OnTrack Program.

Table VII-23
Receipt of Arrearage Forgiveness

Do you receive credit for what you owe PPL for past due balances each month that you are in OnTrack?	
Observations	154
Yes	27%
No	36%
Don't Know	37%
Total	100%

Participants who indicated that they receive monthly arrearage credits were asked how much of their outstanding balance is forgiven each month. Table VII-24 shows that only eight percent of respondents were able to provide an amount.

Table VII-24
Monthly Arrearage Forgiveness Amount

How much of what you owe PPL for past due balances is forgiven each month?	
Observations	154
\$1-\$25	3%
\$26-\$50	3%
\$51-\$75	1%
>\$75	1%
Don't Know	20%
Did Not Receive Arrearage Credits	73%
Total	100%

Respondents who were aware of the monthly arrearage credits were asked if receiving those arrearage credits made them more likely to pay their electric bill each month. Table VII-25 shows that 88 percent indicated that monthly arrearage credits made them more likely to pay their electric bill.

Table VII-25
Arrearage Forgiveness and Likelihood of Paying Monthly Bills

Does this forgiveness of past due balances make you more likely to pay your electric bill?	
Observations	42
Yes	88%
No	10%
Refused	2%
Total	100%

Respondents were asked how difficult it was to make their monthly PPL payments before participating in OnTrack and while participating. Table VII-26 shows that while 63 percent said it was very difficult to pay their PPL bills prior to enrolling in OnTrack, only three percent said it was very difficult while participating in OnTrack. While 15 percent said it was very or somewhat easy to pay their PPL bills prior to enrolling in OnTrack, 81 percent said it was very or somewhat easy to pay their PPL bills while participating in the program.

Table VII-26
Difficulty Paying PPL Bills Before and After Enrolling in OnTrack

How easy or difficult was it to make your monthly PPL bills before participating in OnTrack? While participating in OnTrack?		
	Before OnTrack	In OnTrack
Observations	154	154
Very Difficult	63%	3%
Somewhat Difficult	19%	16%
Somewhat Easy	10%	47%
Very Easy	5%	34%
Don't Know	2%	0%
Total	100%	100%

Participants were asked if they had ever had to skip or delay paying for food, medicine, medical or dental visits, or their rent or mortgage both before and after enrolling in the OnTrack Program. Table VII-27 displays the participants' responses.

- While 64 percent said they had to delay or skip paying for food prior to OnTrack, 24 percent said they did so following enrollment.
- While 29 percent reported that they delayed or skipped paying for medicine before OnTrack enrollment, five percent said they did so following enrollment.
- While 27 percent reported that they delayed or skipped paying for medical or dental visits prior to OnTrack, 12 percent said they did so following enrollment.

- While 39 percent reported that they delayed or skipped paying their rent or mortgage payments prior to OnTrack, 20 percent reported that they did so following enrollment.

**Table VII-27
Delayed or Skipped Necessities
Before and After Enrolling in OnTrack**

In the year before enrolling in OnTrack, did you ever have to delay or skip paying for the following? After enrolling in OnTrack?		
	Before OnTrack	In OnTrack
Observations	154	154
Food	64%	24%
Medicine	29%	5%
Medical or Dental Services	27%	12%
Mortgage or Rent	39%	20%

Participants who reported delaying or skipping necessities, either before or after enrolling in OnTrack, were asked how frequently they had had to do so. Table VII-28 shows that for all categories, the frequency of having to delay or skip paying for necessities decreased after participants enrolled in OnTrack.

**Table VII-28
Frequency of Delaying Necessities before and after Enrolling in OnTrack**

How often did you have to delay or skip paying for food/medicine/medical or dental services/mortgage or rent before enrolling in the OnTrack Program? After enrolling in OnTrack?								
	Food		Medicine		Medical or Dental Services		Mortgage or Rent	
	Before OnTrack	In OnTrack	Before OnTrack	In OnTrack	Before OnTrack	In OnTrack	Before OnTrack	In OnTrack
Observations	154	154	154	154	154	154	154	154
Always	11%	1%	1%	1%	5%	3%	3%	1%
Frequently	13%	3%	5%	1%	5%	3%	6%	3%
Sometimes	31%	14%	16%	2%	14%	3%	18%	10%
Seldom	6%	5%	6%	1%	2%	2%	10%	6%
Never	36%	76%	71%	95%	73%	88%	61%	80%
Don't Know	3%	1%	1%	0%	1%	1%	1%	0%
Total	100%	100%	100%	100%	100%	100%	100%	100%

Participants were asked if they had ever needed to use their kitchen stove or oven to heat their home either in the year before enrolling in OnTrack and since they had first enrolled in the program. Table VII-29 shows that 32 percent reported they did so before enrolling in OnTrack and eight percent reported that they did this while in the OnTrack Program.

Table VII-29
Used Oven/Stove for Heat Before and After Enrolling in OnTrack

In the year before enrolling in OnTrack, did you ever need to use your kitchen stove or oven to heat your home? After enrolling in OnTrack?		
	Before OnTrack	In OnTrack
Observations	154	154
Yes	32%	8%
No	66%	91%
Don't Know	1%	0%
Refused	1%	1%
Total	100%	100%

Respondents who indicated that they had used their oven or stove for heat before or after enrolling in OnTrack were asked how often they had had to do so. Table VII-30 shows that participants reduced the frequency with which they experienced this issue after they began participating in OnTrack.

Table VII-30
Frequency of Using Oven/Stove for Heat Before and After Enrolling in OnTrack

How often did you need to use your kitchen stove or oven to provide heat before enrolling in OnTrack? After enrolling in OnTrack?		
	Before OnTrack	In OnTrack
Observations	154	154
Always	3%	0%
Frequently	6%	2%
Sometimes	23%	6%
Never	68%	92%
Total	100%	100%

Participants were asked to indicate whether they had ever been unable to use their main source of heat because their heating system was broken and they were unable to pay for its repair or replacement. Table VII-31 shows that 15 percent reported that they had been unable to use their main source of heat prior to OnTrack, compared to six percent after enrolling in the program.

**Table VII-31
Unable to Use Main Source of Heat Before and After Enrolling in OnTrack**

In the year before enrolling in the OnTrack Program, was there ever a time when you wanted to use your main source of heat but could not because your heating system was broken and you were unable to pay for its repair/replacement? After enrolling in OnTrack?		
	Before OnTrack	In OnTrack
Observations	154	154
Yes	15%	6%
No	81%	91%
Don't Know	4%	2%
Refused	0%	1%
Total	100%	100%

OnTrack participants were asked whether they or anyone in their household had applied for LIHEAP in the past twelve months, if they had ever received assistance from LIHEAP, and if they assigned the benefit to PPL. Table VII-32 shows that 48 percent of respondents reported that they applied for LIHEAP, 31 percent reported that they received assistance, and 14 percent reported that they assigned the benefit to PPL.

**Table VII-32
LIHEAP Application, Receipt, and Assignment to PPL**

In the past 12 months, did you or any member of your household apply for LIHEAP? Did you or any member of your household receive home energy assistance benefits from LIHEAP? Did you assign the LIHEAP grant to PPL?			
	Applied	Received Assistance	Assigned Benefit to PPL
Observations	154	154	154
Yes	48%	31%	14%
No	47%	68%	83%
Don't Know	5%	1%	3%
Total	100%	100%	100%

Respondents who indicated that they had not applied for LIHEAP were asked why they decided not to apply. Table VII-33 provides the responses.

- 33 percent said that they did not know or had forgotten about LIHEAP.
- 22 percent said that their income was too high or that they were ineligible for some other reason.
- 19 percent said that they did not need the assistance.
- 10 percent said that they believed they could not participate in LIHEAP and OnTrack at the same time.

Some of the participants who thought that they were ineligible for LIHEAP said that they believed LIHEAP did not cover electric heat.

Table VII-33
Reasons for Not Applying for LIHEAP

Why did you not apply for LIHEAP?	
Observations	73
Did Not Know / Forgot About the Program	33%
Income Too High / Ineligible for Other Reason	22%
Not Needed	19%
Believed Ineligible if in OnTrack	10%
Did Not Know How to Apply	7%
Missed the Deadline	4%
Too Proud / Embarrassed	3%
Don't Know	7%

*Some participants provided more than one response.

Respondents were asked how important OnTrack had been in helping them to meet their needs. Table VII-34 shows that 87 percent reported it was very important and eight percent said it was somewhat important. Only four percent said that the program had been of little importance or not important at all.

Table VII-34
Importance of OnTrack in Helping Participants Meet Their Needs

How important has the OnTrack Program been in helping you to meet your needs?	
Observations	154
Very Important	87%
Somewhat Important	8%
Of Little Importance	3%
Not at All Important	1%
Don't Know	1%
Total	100%

Participants were asked if they felt they needed additional assistance to pay their electric bill. Table VII-35 shows that 36 percent said they needed additional assistance.

**Table VII-35
Need for Additional Assistance**

Do you feel that you need additional assistance to pay your electric bill?	
Observations	154
Yes	36%
No	62%
Don't Know	2%
Total	100%

Respondents who said they needed additional assistance to pay their electric bill were asked what kind of assistance they needed. Table VII-36 shows that respondents provided the following information.

- 53 percent said they need more bill payment assistance.
- 35 percent said they need a lower bill.
- 11 percent requested more time to pay their bills each month.

Other responses included housing/food assistance, employment assistance, and any help possible.

**Table VII-36
Types of Additional Assistance Needed**

What kinds of additional assistance do you need to pay your bill?	
Observations	55
More Bill Payment Assistance	53%
Lower Bill	35%
More Time to Pay the Bill	11%
Any Help Possible	7%
Housing/Food Assistance	5%
Employment Assistance	4%
Other	2%
Don't Know	4%

*Some participants provided more than one response.

Participants were asked if their electric usage changed after enrolling in the OnTrack Program. Table VII-37 shows that 40 percent said that their usage had decreased, 40 percent reported that their usage had not changed, and six percent said their usage increased. Additionally, 13 percent of respondents said that they did not know.

**Table VII-37
Change in Electric Usage While in OnTrack**

While participating in the program, would you say your electric usage was higher, lower, or has not changed in comparison to what it was before participating in the program?	
Observations	154
Increase	6%
Decrease	40%
No Change	40%
Don't Know	13%
Total	100%

Respondents who indicated that their usage increased after joining OnTrack were asked about the reasons for the increase.

- 4 said they did not know.
- 2 said they could afford to use more electricity.
- 1 said there was a cold winter.
- 1 said there was a warm summer.

Respondents who indicated that their usage had decreased after joining OnTrack were asked about the reasons for the decrease.

- 65 percent reported that they had made an effort to conserve energy.
- 13 percent reported that they participated in LIURP.
- 10 percent said that they had fewer people or spent less time in the home.

Other responses included participating in a weatherization program, increased energy prices, and moving to a newer or more efficient home.

**Table VII-38
Reasons for Usage Decrease**

Why do you feel that your usage has decreased?	
Observations	62
Try to Reduce/Conserve	65%
LIURP / WRAP	13%
Fewer People / Less Time Spent in Home	10%
Weatherization / WAP	8%
Increased Prices	5%
Moved to Newer/More Efficient Home	5%

Why do you feel that your usage has decreased?	
Other Services Received	3%
Other	3%
Don't Know	3%

*Some participants provided more than one response.

Continued Program Participation

This section includes information about participants' intentions to remain in OnTrack.

Participants were asked how likely they are to continue to participate in the OnTrack program. Table VII-39 shows that 97 percent of respondents said that they were very likely to remain in the program.

Table VII-39
Likelihood of Continued Participation in OnTrack

How likely are you to continue to participate in OnTrack?	
Observations	154
Very Likely	97%
Somewhat Likely	2%
Not at All Likely	1%
Don't Know	1%
Total	100%

Table VII-40 displays the responses participants provided when asked how long they believed they would continue to participate. Nearly three quarters of the respondents said that they intended to stay in OnTrack as long as they needed assistance and continued to qualify for the program. Just ten percent of respondents had any indication of a specific timeframe planned for leaving the program.

Table VII-40
Predicted Length of Continued Participation in OnTrack

How long do you think you will continue to participate in the program?	
Observations	154
0-<6 months	2%
6-12 months	3%
12-18 months	2%
>18 months	3%
Until the Program Ends	1%

How long do you think you will continue to participate in the program?	
As Long as I Need Assistance / Qualify	73%
Don't Know	16%
Total	100%

Program Satisfaction

This section includes information about participants' overall satisfaction with OnTrack and other comments and recommendations they had about the program.

Table VII-41 displays the responses participants provided when asked about their overall satisfaction with the OnTrack Program. While 90 percent said they were very satisfied, ten percent said they were somewhat satisfied. Only one of the 154 respondents indicated any sort of dissatisfaction with the program.

**Table VII-41
Overall Satisfaction with OnTrack**

Overall, how satisfied are you with OnTrack?	
Observations	154
Very Satisfied	90%
Somewhat Satisfied	10%
Somewhat Dissatisfied	0%
Very Dissatisfied	1%
Total	100%

Participants were asked for the best method for PPL to contact them about their status in OnTrack or any program updates. Table VII-42 shows that 31 percent of respondents prefer a letter in the mail, 26 percent would like to receive a phone call from a live PPL representative, and 16 percent would prefer a phone call from PPL with a pre-recorded message. Other common responses included email and text messages.

**Table VII-42
Best Method of Contact**

What is the best way for PPL to get in touch with you to let you know about your status in OnTrack or any program updates?	
Observations	154
Mailed Letter	31%
Phone Call from Live PPL Representative	26%
Phone Call with Recorded Message	16%
Email	14%

What is the best way for PPL to get in touch with you to let you know about your status in OnTrack or any program updates?	
Text Message	12%
Face to Face	1%
Total	100%

Near the end of the survey, participants were offered the opportunity to provide additional comments or recommendations for the OnTrack Program. Table VII-43 provides a summary of these comments. While three quarters of the participants did not offer any additional comments, several participants expressed gratitude for the program or offered tangible recommendations for the program such as improving program communication, expanding program outreach, increasing program benefits, and making the application process easier. Some of the participants' comments are included below.

- I think the program is great but a lot of people don't know about it. They should expand their outreach.
- I'm very happy that the services are available because on an annual basis it saves me money. In the spring and the fall my real electric consumption is equal to the OnTrack payment so it's a wash. In those months, it would be nice if they could pay us out the remaining bill credit in cash to reward us for keeping our usage down.
- PPL should be more lenient with program requirements when families are going through particularly tough economic times.
- I think they should raise the usage limit.
- I would like to see the bill credit amount increased.
- PPL should try to streamline the application process. Make the documents able to be uploaded online or via app. Take pictures of the documents to easily turn into PDFs. It goes faster and is easier that way.
- They should give people more time to submit documents for recertification.
- They should provide a clearer notice about how much is being taken off the bill each month.
- I wasn't told that there was a limit and I didn't know about the monthly variation in bills. They should be clearer about those things while people are joining.

**Table II-42
Comments and Recommendations**

Do you have any recommendations for improvements to the OnTrack Program?	
Observations	154
No Additional Comments	75%
Improved Communication	6%
Gratitude for OnTrack	3%
More Outreach / Expand the Program	3%
Increase Benefits / Energy Credit Limit	3%
Make Application Process Easier	3%
Be More Flexible on Deadlines	2%
Other	6%

*Some participants provided more than one response.

C. Summary and Recommendations

APPRISE conducted a survey with 154 PPL OnTrack participants between August 26 and September 16, 2019. This section provides a summary of key findings and recommendations from the survey.

Demographics

- Disabled Household Members: 49 percent of the respondents reported that their household included a member with a disability.
- Education Level: 61 percent of respondents reported that the highest level of education reached by any family member was a high school education or less.
- Income Sources: 68 percent received food stamps or were in public housing; 44 percent received TANF, SSI, SSDI or General Assistance; 41 percent had employment income; and 23 percent had retirement income.
- Unemployment: 27 percent reported that they had been unemployed and looking for work over the past 12 months.
- Household Income: 54 percent had an annual household income of less than \$20,000.

Reasons for Participation and Enrollment

- OnTrack Information Source: Most OnTrack participants learned about the program through a personal contact, a PPL customer service representative, or at an agency.

- Reason for Enrollment: OnTrack participants were most likely to report that they had enrolled in the program to reduce their energy bills. Other common responses included having a low or fixed income and reducing arrearages.
- Enrollment Method: 36 percent of respondents said that they enrolled at an agency, 35 percent said they enrolled over the phone, 11 percent said they enrolled by mail, and 10 percent said they enrolled online.
- Document Submission: 43 percent said they submitted the required documentation by mail, 34 percent submitted it in person, and 12 percent uploaded it to the internet or attached it to an email.
- Enrollment/Recertification Difficulty: 93 percent said OnTrack enrollment had been very or somewhat easy, and 91 percent of those who recertified said it had been very or somewhat easy.
- Satisfaction with OnTrack Application Process: 95 percent said they were very or somewhat satisfied with the OnTrack application process.

Program Understanding, Impact, and Usage

- OnTrack Understanding: 94 percent said they felt they had a good understanding of the services provided by OnTrack.
- OnTrack Benefits: 97 percent agreed that even monthly payments were a benefit of the program, 96 percent agreed that lower energy bills were a benefit, 86 percent agreed that monthly bill credits were a benefit, and 82 percent agreed that reduced arrearages were a benefit. When asked about the most important benefit, 58 percent said it was lower energy bills and 25 percent said it was the even monthly payments.
- OnTrack Maximum Benefit: Respondents were asked several questions about the OnTrack maximum benefit.
 - 51 percent indicated that they were aware of the maximum benefit limit.
 - 42 percent said that they had received a letter from PPL reminding them of the credit limit.
 - Among the 64 participants who received the PPL letter, 70 percent indicated that they had changed how they use energy as result of the information conveyed in the letter.
- Arrearage Forgiveness: Awareness of arrearage forgiveness is low, but those who are aware said it made them more likely to pay their bill.
 - 27 percent of the respondents reported that they received monthly arrearage credits from OnTrack.
 - 88 percent of those who said they received credits said that their arrearage credits made them more likely to pay their electric bill each month.

- **Difficulty Paying PPL Bills:** OnTrack had a large impact on participants' reported difficulty paying their monthly electric bills and other expenses.
 - While 63 percent said it was very difficult to pay their PPL bills prior to enrolling in OnTrack, only three percent said it was very difficult while participating in OnTrack.
 - While 15 percent said it was very or somewhat easy to pay their PPL bills prior to enrolling in OnTrack, 81 percent said it was very or somewhat easy to pay their PPL bills while participating in the program.
 - While 64 percent said they had to delay or skip paying for food prior to OnTrack, 24 percent said they did so following enrollment.
 - While 29 percent reported that they delayed or skipped paying for medicine before OnTrack enrollment, five percent said they did so following enrollment.
 - While 27 percent reported that they delayed or skipped paying for medical or dental visits prior to OnTrack, 12 percent said they did so following enrollment.
 - While 39 percent reported that they delayed or skipped paying for their rent or mortgage payments prior to OnTrack, 20 percent reported that they did so following enrollment.

- **LIHEAP Assistance:** Forty-eight percent of respondents reported that they applied for LIHEAP, 31 percent reported that they received benefits, and 14 percent reported that they assigned their LIHEAP grant to PPL.

- **LIHEAP Application:** Respondents who indicated that they had not applied for LIHEAP were asked why they decided not to apply. Most did not know about LIHEAP, forgot about LIHEAP, thought they were ineligible, or did not need assistance.
 - 33 percent said that they did not know or had forgotten about LIHEAP.
 - 22 percent said that their income was too high or that they were ineligible for some other reason.
 - 19 percent said that they did not need the assistance.
 - 10 percent said that they believed they could not participate in LIHEAP and OnTrack at the same time.
 - Some of the participants who thought that they were ineligible for LIHEAP said that they believed LIHEAP did not cover electric heat.

- **Importance of OnTrack:** 87 percent said that OnTrack had been very important in helping them to meet their needs and eight percent said it was somewhat important.

- **Need for Additional Assistance:** 36 percent indicated a need for additional assistance to pay their electric bill. Common types of assistance requested included more bill payment assistance, lowered electricity bills, and more time to pay the bill each month.

- **Change in Usage:** Participants were asked if their electric usage changed after enrolling in the OnTrack Program.
 - 40 percent said that their usage had decreased.
 - 40 percent reported that their usage had not changed.

- 6 percent said their usage increased.
- 13 percent of respondents said that they did not know.

Those who said their usage declined provided the following reasons.

- 65 percent reported that they had made an effort to conserve energy.
- 13 percent reported that they participated in LIURP.
- 10 percent said that they had fewer people or spent less time in the home.

Program Satisfaction

- Overall Satisfaction with OnTrack: 90 percent were very satisfied with OnTrack, and 10 percent were somewhat satisfied.
- Best Method of Contact about OnTrack: 31 percent of respondents prefer a letter in the mail, 26 percent would like to receive a phone call from a live PPL representative, and 16 percent would prefer a phone call from PPL with a pre-recorded message. Other common responses included email and text messages.
- Participant Comments and Recommendations: Respondents were given the opportunity to provide additional comments or recommendations for the OnTrack Program. While most of the participants chose not to comment, the most common responses were that PPL should improve their communication with participants, expand outreach for the program, increase the program benefits, and make the application process easier.

VIII. Impact Analysis

This section provides the analysis of the program's impacts on affordability, bill payment compliance, and collections actions. This section first describes the methodology for the analyses that were conducted and then the findings from the analyses.

A. Methodology

This section describes the evaluation data and the selection of participants for the impact analysis.

Evaluation Data

PPL provided APPRISE with customer data, Universal Service Program participation data, billing and payment data, and collections data from January 2016 through August 2019. PPL also provided data for a comparison group of LIHEAP participants who did not participate in PPL's Universal Service Programs during this time period.

These data were used for the following analyses.

- Characterizing program participants and program parameters.
- Selecting the sample of current OnTrack participants for the customer survey.
- Conducting the impact analysis that is presented in this section.

Selected Participants: Analysis Group

Customers who enrolled or participated in OnTrack between July 1, 2017 and June 30, 2018 were included as potential members of the study group. This group was chosen for the analysis, as one full year of post-program data is required for an analysis of program impacts. Additionally, results are presented for customers who received OnTrack credits at any time during 2018 to look at the broader population of OnTrack participants.

When measuring the impact of an intervention, it is necessary to recognize other exogenous factors that can impact changes in outcomes. Changes in a client's payment behavior and bill coverage rate, between the year preceding program enrollment and the year following enrollment, may be affected by many factors other than program services received. Some of these factors include changes in household composition or health of family members, changes in utility prices, changes in weather, and changes in the economy.

The ideal way to control for other factors that may influence payment behavior would be to randomly assign low-income customers to a treatment or control group. The treatment group would be given the opportunity to participate in the program first. The control group would not be given an opportunity to participate in the program until one full year later. This would allow evaluators to determine the impact of the program by subtracting the change in behavior for the control group from the change in behavior for the treatment group. Such random assignment is rarely done in practice because of a desire to include all eligible customers in the benefits of the program or to target a program to those who are most in

need. Therefore, we constructed two comparison groups to match the treatment group as well as possible.

Nonparticipant Comparison Group

The nonparticipant comparison group is one of the groups that was constructed to control for exogenous factors. The comparison group was designed to be as similar as possible to the treatment group, those who received services and who we are evaluating, so that the exogenous changes for the comparison groups are as similar as possible to those of the treatment group. *The comparison group was a random sample of customers who received LIHEAP or LIHEAP Crisis between 2016 and 2019 and did not participate in OnTrack.* These customers were replicated to represent customers who enrolled in the program in each quarter in the second half of 2017 and the first half of 2018 to match the treatment group's enrollment dates. Data were analyzed in the year before and the year after each quasi-enrollment date.

Later Participant Comparison Group

We also analyzed customers who enrolled in OnTrack between July 1, 2018 and June 30, 2019 and who did not receive OnTrack Credits or Arrearage Credits in the two years preceding enrollment. We required that they received no credits in the two years preceding enrollment to ensure that they were nonparticipants in both periods. These participants serve as a good comparison because they are low-income households who were eligible for the program and chose to participate. We used data for these participants for the two years preceding OnTrack enrollment, to compare their change in payment behavior in the years prior to enrolling to the treatment group's change in payment behavior after enrolling. Because these customers did not participate in OnTrack in either of the two analysis years, changes in bills and behavior should be related to factors that are exogenous to the program.

For the program impact analysis, we examined pre and post-treatment statistics. The difference between the pre and post-treatment statistics for the treatment group is considered the gross change. This is the actual change in behaviors and outcomes for those participants who were served by the program. Some of these changes may be due to the program, and some of these changes are due to other exogenous factors, but this is the customer's actual experience. The net change is the difference between the change for the treatment group and the change for the comparison groups, and represents the actual impact of the program, controlling for other exogenous changes.

Customers who participated in OnTrack in the year prior to enrollment were excluded from the analysis, to allow for a comparison of data while not participating and while participating in OnTrack. Customers who did not have a full year of data prior to joining the program or a full year of data following the program start date were not included in the impact analysis. The subject of data attrition is addressed more fully below.

The data that were used for the study and comparison group were as follows.

- 2017-2018 Treatment Group data extended from one year before the customer joined OnTrack to one year after the customer enrolled or participated.

- Low-Income Nonparticipant Comparison Group data included one year of data before the mid-point of the third quarter of 2017 to one year of data after the mid-point of the second quarter of 2018.
- Later Participant Comparison Group data extended from two years before the customer joined OnTrack to just before the customer enrolled in OnTrack.

Table VIII-1 describes the treatment and comparison groups that are included in the analyses.

**Table VIII-1
Treatment and Comparison Groups**

	2017-2018 Enrollee Treatment Group	Nonparticipant Comparison Group	Later Participant Comparison Group
Group	2017-2018 OnTrack Enrollees	Nonparticipants	2018-2019 OnTrack Enrollees
Enrollment Requirement	OnTrack enrollment date between 7/1/2017 and 6/30/2018	Did not participate in OnTrack.	OnTrack enrollment date between 7/1/2018 and 6/30/2019
OnTrack Participation Requirement	Did not participate in OnTrack in the year prior to enrollment		Did not participate in OnTrack in the two years prior to enrollment
Pre-participation Dates	1 year prior to enrollment	One year prior to the quasi enrollment dates of 8/15/17, 11/15/17, 2/15/18,5/15/18	2 years prior to enrollment
Post-participation Dates	1 year after enrollment	One year after the quasi enrollment dates of 8/15/17, 11/15/17, 2/15/18,5/15/18	1 year prior to enrollment

In addition to the Treatment Group and the comparison groups, we analyzed program statistics for all customers who participated in OnTrack in 2018. The Treatment Group, described above, is a select group of customers who recently enrolled and did not participate in OnTrack for at least a year before that enrollment. It is necessary to look at this subset of OnTrack participants to understand how the program impacted affordability and payment behavior. However, looking at all 2018 OnTrack participants provides a more comprehensive picture of the characteristics and benefits received by program participants. Therefore, we provide both types of analyses.

B. OnTrack Analysis

This section examines data attrition and results for the OnTrack Analysis. The following information is summarized.

- Data Attrition
- OnTrack Participation
- OnTrack Discounts
- Affordability Impacts
- Payment Impacts
- Arrearage Forgiveness

- Collections Impacts
- Maximum Credits

Data Attrition

Table VIII-2A provides the attrition analysis for the Enrollee Treatment Group and All 2018 Participants.

The table shows that 75 percent of the Enrollee Treatment Group and 64 percent of All 2018 OnTrack Participants had enough data to be included in the analysis.

Many of those in the Treatment Group (the 2017-2018 enrollees) could not be included in the analysis group because their accounts were not opened a year prior to the OnTrack enrollment date or did not remain open for a full year after enrollment. Customers were also eliminated from the analysis group because they did not have a full year of pre or post billing and payment data or they were extreme outliers in billing and credit amounts.

**Table VIII-2A
OnTrack Analysis Data Attrition**

Exclusion Reason	Enrollee Treatment Group	All 2018 Participants
Included in OnTrack Program Data	143,688	143,688
Enrolled in OnTrack Between 7/1/2017-6/30/2018	38,019	--
Did Not Receive OnTrack Credits or Arrearage Credits in Pre Period	23,207	--
Received At Least One OnTrack Credit or Arrearage Credit in Post Period*	22,828	82,661
Account Opened More Than 300 Days Before Enrollment	8,238	--
Account Closed More Than 300 Days After Enrollment	6,872	--
All Eligible	6,872	82,661
Sufficient Pre & Post Billing Data*	5,286	53,516
Outliers Removed	5,183	52,878
% of Eligible	75%	64%

*Note: For the All 2018 Participants Group, "Post Period" indicates calendar year 2018.

Table VIII-2B displays the data attrition for the comparison groups. While 74 percent of those in the Later Participant Comparison Group who are eligible are included in the analysis, between 78 and 82 percent of those in the Nonparticipant Comparison Group are included in the analysis.

**Table VIII-2B
OnTrack Analysis Data Attrition – Comparison Groups**

Exclusion Reason	Later Participant Comparison Group	Nonparticipant Comparison Group Quasi Enrollment Date			
		8/15/17	11/15/17	2/15/18	5/15/18
Included in OnTrack Program Data	143,688	--	--	--	--
Included in LIHEAP Customer Data	--	35,949	35,949	35,949	35,949
Not Included in OnTrack Program Data	--	8,496	8,496	8,496	8,496
Enrolled in OnTrack Between 7/1/2018 – 6/30/2019	42,212	--	--	--	--
Did Not Receive OnTrack or Arrearage Credits in Pre Period	24,222	8,494	8,494	8,494	8,490
Did Not Receive OnTrack or Arrearage Credits in Post Period	22,397	8,483	8,483	8,482	8,482
Account Opened More than 300 Days Before Enrollment*	5,505	6,057	6,510	6,841	7,198
Account Closed More than 300 Days After Enrollment	--	2,815	2,709	2,626	2,651
All Eligible	5,505	2,815	2,709	2,626	2,651
Sufficient Pre & Post Billing Data	4,141	2,339	2,181	2,164	2,225
Outliers Removed	4,054	2,280	2,127	2,111	2,180
% of Eligible	74%	81%	79%	78%	82%

*Note: Eligibility for the Later Participants was determined using Service Begin Date ≥ 600 Days before enrollment so that two years of pre-enrollment data could be analyzed.

Table VIII-3 compares the characteristics of All 2018 Participants, the Treatment Group, the Nonparticipant Comparison Group and the Later Participant Comparison Group, with those who had enough data to be included in the analyses that follow (labelled “Analysis Group”). In general, the “All” groups were very similar to the “Analysis Group”, providing some level of confidence that the impacts estimated are attributable to the full population of program participants. The notable differences were as follows.

- Seniors – Those included in the Analysis Groups are more likely to have senior household members.
- Children – Those included in the Analysis Groups are less likely to have children.
- Income Source – Later Participant Comparison Group members included in the Analysis are less likely to have salary income and more likely to have Social Security income.
- Electric Heat – Treatment Group and Nonparticipant Comparison Group members who are included in the Analysis are less likely to have electric heat.

**Table VIII-3
Customer Characteristics Comparison**

	All 2018 OnTrack Participants		Treatment Group		Nonparticipant Comparison Group		Later Participant Comparison Group	
	All	Analysis Group	All	Analysis Group	All	Analysis Group	All	Analysis Group
Observations	82,661	52,878	22,828	5,183	33,930	8,698	22,397	4,054
Senior	15%	18%	11%	19%	11%	18%	12%	29%
Children	58%	55%	65%	55%	64%	54%	62%	44%
Annual Income								
≤\$10,000	28%	26%	25%	20%	39%	32%	22%	17%
\$10,001-\$20,000	39%	40%	40%	42%	35%	35%	42%	47%
\$20,001-\$30,000	22%	22%	24%	25%	17%	19%	25%	24%
\$30,001-\$40,000	8%	8%	8%	10%	5%	8%	9%	10%
>\$40,000	3%	4%	3%	4%	3%	6%	2%	3%
Poverty Group								
≤50%	19%	17%	17%	13%	36%	30%	15%	8%
51 – 100%	45%	46%	46%	42%	40%	38%	46%	40%
101 – 150%	36%	38%	37%	45%	24%	32%	40%	51%
Unknown	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%
Income Sources								
Salary	49%	48%	55%	53%	70%	73%	54%	45%
Public Assistance	5%	5%	5%	3%	< 1%	< 1%	5%	3%
Social Security	14%	15%	12%	16%	1%	2%	11%	22%
SSI Disability	29%	31%	23%	22%	2%	1%	31%	34%
Unemployment	3%	3%	4%	5%	< 1%	< 1%	4%	5%
Other Income	24%	23%	26%	25%	20%	20%	18%	15%
Electric Heat	47%	45%	48%	39%	69%	62%	50%	50%

OnTrack Participation

This section explores OnTrack participation and how it varies over time. Table VIII-4 examines the percent of participants who remained an OnTrack participant for the full year. Customers may remain in OnTrack for a particular month but not receive an OnTrack credit if they were removed and then re-instated in the program.

A customer was defined as a full year participant if their earliest enrollment date was before the first bill (for All 2018 Participants, not the Treatment Group who all were enrolled

before the first bill included in the analysis), they were not removed from the program during the analysis period, or they received all OnTrack Credits during the analysis year. Of the 1,166 customers in the Enrollee Treatment Group who were not counted as full year participants, 315 reached or exceeded the maximum OnTrack credit amount (using the most recent limit implemented in March 2018). These customers may have been removed for reaching the maximum credit or for a different reason.

The table shows that 46 percent of all customers who participated in OnTrack in 2018 were in OnTrack for the full year. Within the Treatment Group, 78 percent were in OnTrack for the full year following their 2017-2018 enrollment. A smaller percentage, 25 percent of All 2018 Participants and 35 percent of the Treatment Group, received 12 months' worth of OnTrack credits.

**Table VIII-4
Full Year OnTrack Participation**

	All 2018 OnTrack Participants		Treatment Group	
	#	%	#	%
Final Analysis Group	52,878	100%	5,183	100%
Full Year in OnTrack	24,570	46%	4,017	78%
Not Full Year in OnTrack	28,308	54%	1,166	23%
Received All OnTrack Credits	13,045	25%	1,838	35%

Table VIII-5A displays the mean number and amount of OnTrack credits received by Electric Non-Heating OnTrack Participants. The table shows that All 2018 Participants received an average of eight credits in 2018 and the full year participants received an average of 9.8 credits. Full year participants received an average of \$684 in credits.

**Table VIII-5A
Electric Non-Heating OnTrack Participants
OnTrack Credits Received**

	All 2018 Participants Credits in 2018				Treatment Group Credits in Year after Enrollment			
	Obs.	Mean # Credits	Mean Credits	Median Credits	Obs.	Mean # Credits	Mean Credits	Median Credits
All	28,889	8.0	\$626	\$516	3,148	9.7	\$731	\$586
Full Year OnTrack	13,260	9.8	\$684	\$608	2,354	10.2	\$663	\$563
Received All OnTrack Credits	7,533	12.0	\$855	\$775	1,281	12.0	\$860	\$799

Note: 436 accounts were excluded from the All 2018 Participants analysis because they received multiple credits at the beginning of the analysis period that were missed from previous bills prior to the analysis period.

Obs. refers to the number of observations.

Table VIII-5B displays the mean number and amount of OnTrack credits received by Electric Heating OnTrack Participants. The table shows that All 2018 Participants received an average of 7.8 credits in 2018 and the full year participants received an average of 9.6 credits. Full year participants received an average of \$1,298 in credits.

Table VIII-5B
Electric Heating OnTrack Participants
OnTrack Credits Received

	All 2018 Participants Credits in 2018				Treatment Group Credits in Year after Enrollment			
	Obs.	Mean # Credits	Mean Credits	Median Credits	Obs.	Mean # Credits	Mean Credits	Median Credits
All	23,335	7.8	\$1,087	\$904	2,035	8.7	\$1,054	\$849
Full Year OnTrack	10,807	9.6	\$1,298	\$1,166	1,663	9.1	\$1,088	\$894
Received All OnTrack Credits	5,512	12.0	\$1,611	\$1,484	557	12.0	\$1,470	\$1,243

Note: 208 accounts were excluded from the All 2018 Participants analysis because they received multiple credits at the beginning of the analysis period that were missed from previous bills prior to the analysis period.

Obs. refers to the number of observations

Table VIII-6 displays the percent of the OnTrack Treatment Group that were still enrolled in the program and the percent that received OnTrack credits following enrollment. The table shows that 78 percent received a credit at month three, 76 percent received a credit at month six, 75 percent received a credit at month 9, and 71 percent received a credit at month 12.

Table VIII-6
Percent who Received CAP Credit Following Enrollment
Treatment Group

	Observations	Treatment Group Months After Enrollment			
		3	6	9	12
Has Bill	5,183	4,744	4,710	4,592	5,100
Remaining in OnTrack		99%	98%	96%	90%
CAP Credit-#		3,721	3,590	3,453	3,637
CAP Credit-%		78%	76%	75%	71%

Table VII-7 displays the number and percent of 2018 OnTrack participants and 2017-2018 enrollees that had a minimum payment. The numbers include Electric Non-Heating participants who had at least one bill (full bill minus OnTrack credit) that was between \$12 and \$17 and Electric Heating customers who had at least one bill that was between \$30 and \$35. The range is used due to the possibility of CAP Plus amounts charged.

The table shows that six percent of Non-Electric Heating participants and 13 percent of Electric Heating participants had the minimum bill in 2018.

**Table VIII-7
OnTrack Participants with the Minimum Bill**

Poverty Level	All 2018 Participants					
	Non-Electric Heating		Electric Heating		Total	
	#	%	#	%	#	%
≤50%	1,174	23%	1,125	29%	2,299	26%
51 – 100%	457	3%	1,223	11%	1,680	7%
101 – 150%	270	2%	596	7%	866	4%
All	1,901	6%	2,944	13%	4,845	9%
Poverty Level	Treatment Group					
	Non-Electric Heating		Electric Heating		Total	
	#	%	#	%	#	%
≤50%	76	18%	62	26%	138	21%
51 – 100%	41	3%	99	12%	140	6%
101 – 150%	27	2%	43	5%	70	3%
All	144	5%	204	10%	348	7%

Note: Two observations were excluded from the Treatment Group analysis and 41 observations were excluded from the All Participants Group analysis due to missing poverty level.

Table VIII-8A displays the mean percent discount received on the PPL bill by the Treatment Group in the year following enrollment. While those who remained in OnTrack for the full year received a mean discount of about 40 percent, those who received all of the credits received a mean discount of about 50 percent.

**Table VIII-8A
Mean Percent Discount on PPL Bill
Treatment Group**

	Treatment Group		
	Non Electric Heating	Electric Heating	All
Full Year OnTrack	40%	43%	41%
Not Full Year OnTrack	37%	30%	35%
Received All OnTrack Credits	51%	57%	53%
Total	39%	40%	40%

Table VIII-8B displays the distribution of the percent discount by full year OnTrack participation. The table shows that 18 percent of Electric Heating OnTrack participants who participated for the full year had an OnTrack discount of less than 25 percent, 49 percent had a discount between 25 and 49 percent, 28 percent had a discount of between 50 and 74 percent, and five percent had a discount of more than 75 percent.

Table VIII-8B
Distribution of Discount on PPL Bill by Full Year OnTrack Participation
Treatment Group

Percent Discount	Non-Electric Heating			Electric Heating		
	Full Year	Not Full Year	Received All OnTrack Credits	Full Year	Not Full Year	Received All OnTrack Credits
<25%	26%	33%	5%	18%	43%	1%
25%-49%	42%	38%	43%	49%	42%	32%
50%-74%	27%	27%	42%	28%	14%	53%
≥75%	5%	2%	9%	5%	1%	14%
Total	100%	100%	100%	100%	100%	100%

Table VIII-8C shows that customers in the lowest poverty level group received the greatest discount, measured as the OnTrack credits divided by the full bill. Customers with household income at or below 50 percent of the poverty level received an average discount of 59 percent.

Table VIII-8C
Percent Discount on PPL Bill by Poverty Level
Treatment Group

Poverty Level	Non-Electric Heating		Electric Heating		Total	
	Observations	% Discount	Observations	% Discount	Observations	% Discount
≤50%	416	59%	242	58%	658	59%
51%-100%	1,335	43%	847	43%	2,182	43%
101%-150%	1,396	30%	945	34%	2,341	32%
Missing	1	44%	1	39%	2	41%
Total	3,148	39%	2,035	40%	5,183	40%

Table VIII-8D displays the distribution of the discount provided through the OnTrack credits by poverty level. The table shows that the lower poverty level groups have greater discount levels. While 67 percent of Electric Heating customers with household income at or below 50 percent of poverty have a discount of 50 percent or more, 33 percent between 51 and 100 percent have a discount of 50 percent or more and 17 percent of those with a poverty level of 101 to 150 percent have a discount of 50 percent or more.

Table VIII-8D
Distribution of Discount on PPL Bill by Poverty Level
Treatment Group

Percent Discount	Non-Electric Heating					Electric Heating				
	Poverty Level					Poverty Level				
	≤50%	51%-100%	101%-150%	Missing	Total	≤50%	51%-100%	101%-150%	Missing	Total
Obs.	416	1,335	1,396	1	3,148	242	847	945	1	2,035
<25%	6%	18%	44%	0%	28%	3%	16%	33%	0%	22%
25%-49%	21%	44%	44%	100%	41%	30%	50%	50%	100%	48%
50%-74%	51%	36%	11%	0%	27%	50%	30%	16%	0%	26%
≥75%	21%	2%	1%	0%	4%	17%	3%	1%	0%	4%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Obs. refers to the number of observations.

Affordability Impacts

This section examines the OnTrack affordability impacts.

Table VIII-9A displays the affordability impacts for Electric Non-Heating customers. The table shows that the Treatment Group had higher full bills than the comparison groups in the pre-treatment analysis year, but bills that were approximately the same as the comparison groups in the post-treatment year.

The table shows that the Electric Non-Heating Treatment Group received an average OnTrack credit of \$731, which reduced their mean energy burden from 13 percent to seven percent. The later participant comparison group had an average energy burden of ten percent and the nonparticipant comparison group had an average energy burden of 26 percent which did not change from the pre to post analysis year.

Table VIII-9A
Affordability Impacts
Electric Non-Heating Customers

	Treatment Group			Comparison Group								Average Net Change
	Pre	Post	Change	Later Participants				Nonparticipants				
				Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	3,148			2,416				3,302				
Full Bill	\$1,703	\$1,735	\$32**	\$1,532	\$1,755	\$224**	-\$192**	\$1,628	\$1,708	\$80**	-\$48**	-\$120
Discount	\$0	\$731	\$731**	\$0	\$0	\$0	\$731**	\$0	\$0	\$0	\$731**	\$731
Discounted Bill	\$1,703	\$1,004	-\$699**	\$1,531	\$1,755	\$224**	-\$923**	\$1,628	\$1,708	\$80**	-\$770**	-\$851
Energy Burden	13%	7%	-5%**	10%	11%	1%**	-6%**	26%	26%	1%	-6%**	-6%

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table VIII-9B displays the affordability impacts for Electric Heating customers. The table shows that the Treatment Group had higher full bills than both comparison groups in the pre-treatment analysis year, and higher than the nonparticipant comparison groups in the post-treatment year.

The table shows that the Electric Heating Treatment Group received an average OnTrack credit of \$1,054 which reduced their mean energy burden from 17 percent to ten percent. The later participant comparison group had an average energy burden of 14 percent and the nonparticipant comparison group had an average energy burden of 26 percent, and both had small increases in burden. Therefore, the treatment group had a net reduction in energy burden of nine percentage points.

**Table VIII-9B
Affordability Impacts
Electric Heating Customers**

	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	2,035			1,638				5,396				
Full Bill	\$2,317	\$2,464	\$147**	\$2,049	\$2,367	\$318**	-\$171**	\$2,008	\$2,168	\$160**	-\$13	-\$92
Discount	\$0	\$1,054	\$1,054**	\$0	\$0	\$0	\$1,054**	\$0	\$0	\$0	\$1,054**	\$1,054
Discounted Bill	\$2,317	\$1,410	-\$907**	\$2,049	\$2,367	\$318**	-\$1,225**	\$2,008	\$2,168	\$160**	-\$1,067**	-\$1,146
Energy Burden	17%	10%	-7%**	14%	16%	2%**	-9%**	26%	27%	1%**	-8%**	-9%

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

The Pennsylvania Public Utility Commission (PUC) has specified targeted energy burden levels for customers who participate in Customer Assistance Programs (CAP). However, the PUC also has specified cost control measures that may prevent customers who reach maximum discount levels or who have minimum payment levels to reach these affordability targets.⁶

Table VIII-10A shows that a large percentage of customers still had an energy burden above the PUC target in the year following OnTrack enrollment, especially those with income at or below 50 percent of the poverty level.

⁶ The PUC recently issued an order reducing the targeted energy burden.

**Table VIII-10A
Electric Burden and Relationship to PUC Target
Treatment Group**

Non-Electric Heating					
Poverty Level	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	2%-5%	100%	100%
≤50%	27%	10%	2%-5%	96%	76%
51% – 100%	11%	6%	4%-6%	77%	26%
101% – 150%	8%	5%	6%-7%	39%	7%
Electric Heating					
Poverty Level	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	7%-13%	100%	100%
≤50%	38%	17%	7%-13%	86%	47%
51% – 100%	16%	9%	11%-16%	34%	5%
101% – 150%	10%	7%	15%-17%	10%	1%

Note: Two customers were excluded from the analysis because they did not have a poverty level, and 21 customers were excluded because their income data and poverty level data were inconsistent.

Table VIII-10B displays the amount by which customers exceeded their targeted energy burdens. The table shows that within the Treatment Group, about one quarter of those with a burden exceeding the target were above the target by less than \$100, about one quarter were above the target by \$100 to \$200, about one quarter were above the target by \$200 to \$500, and about one quarter were above the target by more than \$500. The All Participants Group were above the target by a greater amount.

**Table VIII-10B
Dollar Amount above Electric Burden Targets
Treatment Group and All 2018 Participants
Customers Who Exceeded Electric Burden Targets**

Enrollee Treatment Group – Year after Enrollment										
\$ Amount Above Target Burden	Non-Electric Heating					Electric Heating				
	Poverty Level					Poverty Level				
	\$0 Income	≤50%	51%-100%	101%-150%	Total	\$0 Income	≤50%	51%-100%	101%-150%	Total
Obs.	28	294	340	98	760	20	104	44	8	176
\$1 - \$100	18%	31%	21%	6%	23%	20%	37%	23%	13%	30%
\$101 - \$200	7%	31%	19%	20%	24%	10%	20%	23%	25%	20%

Enrollee Treatment Group – Year after Enrollment										
\$ Amount Above Target Burden	Non-Electric Heating					Electric Heating				
	Poverty Level					Poverty Level				
	\$0 Income	≤50%	51%-100%	101%-150%	Total	\$0 Income	≤50%	51%-100%	101%-150%	Total
\$201-\$500	18%	18%	31%	30%	25%	15%	27%	16%	25%	23%
\$501-\$1,000	25%	12%	20%	36%	19%	15%	8%	20%	25%	13%
>\$1,000	32%	8%	9%	8%	9%	40%	9%	18%	13%	15%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
All 2018 Participants										
\$ Amount Above Target Burden	Non-Electric Heating					Electric Heating				
	Poverty Level					Poverty Level				
	\$0 Income	≤50%	51%-100%	101%-150%	Total	\$0 Income	≤50%	51%-100%	101%-150%	Total
Obs.	730	3,595	5,645	1,929	11,899	534	2,008	1,227	289	4,058
\$1 - \$100	2%	12%	9%	2%	8%	5%	11%	5%	4%	8%
\$101 - \$200	3%	17%	16%	13%	15%	3%	12%	13%	9%	11%
\$201-\$500	21%	29%	32%	30%	30%	13%	26%	28%	31%	25%
\$501-\$1,000	33%	24%	25%	32%	26%	26%	24%	27%	29%	26%
>\$1,000	41%	19%	18%	23%	20%	53%	27%	27%	27%	30%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Note: If the customer's target bill was less than the minimum bill amount, the dollar amount above the target burden was calculated as the difference between the customer's actual bill and the minimum bill. There were 2 customers in the enrollee treatment group and 36 customers in the All 2018 Participants Group who were above the target burden, but whose actual bill was less than the minimum bill. These customers are counted in the "\$1-\$100" group.

Obs. refers to the number of observations.

Table VIII-10C shows that a large percentage of the full year OnTrack participants also had a burden that exceeded the PUC target. For the lower-income households, this is likely due to minimum payments and maximum credits that are provided by the program.

Table VIII-10C
Electric Burden and Relationship to PUC Target
Treatment Group with Full Year OnTrack Participation

Non-Electric Heating					
Poverty Level	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	2%-5%	100%	100%
≤50%	25%	8%	2%-5%	96%	72%
51% - 100%	11%	5%	4%-6%	75%	16%

101% – 150%	7%	5%	6%-7%	36%	2%
Electric Heating					
Poverty Level	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post	Heating	Pre	Post
\$0 Income	100%	100%	7%-13%	100%	100%
≤50%	39%	16%	7%-13%	86%	46%
51% – 100%	16%	9%	11%-16%	35%	3%
101% – 150%	10%	7%	15%-17%	9%	< 1%

Note: Two customers were excluded from the analysis because they did not have a poverty level, and 11 customers were excluded because their income data and poverty level data were inconsistent.

Payment Impacts

This section examines the impact of OnTrack participation on payment compliance. Table VIII-11A displays results for Electric Non-Heating customers. The table shows the following positive payment results for the OnTrack participants in the year following their 2017-2018 OnTrack enrollment.

- OnTrack participants increased the number of cash payments made from an average of 8.2 in the year prior to OnTrack participation to 10.1 in the year following OnTrack enrollment. This represented an increase of 2.4 payments compared to the comparison groups.
- OnTrack participants increased their total payments and credits in the year following enrollment as the decline in cash payments and other credits was smaller than the amount of OnTrack credits received.
- The total coverage rate (the percent of the bill covered by cash and assistance payments) increased for OnTrack participants from 84 percent in the year prior to OnTrack enrollment to 98 percent in the year following enrollment. The comparison groups had a reduction in their coverage rates, so the net change was an increase in the total coverage rate of 21 percentage points.
- OnTrack Electric Non-Heating participants received an average of \$539 in arrearage forgiveness in the year following enrollment.
- The balance of OnTrack participants declined by \$454 as compared to the comparison groups.

**Table VIII-11A
Payment Impacts
Non-Electric Heating Customers**

	Treatment Group			Comparison Groups								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
# of Customers	3,148			2,416				3,302				
Electric Charges	\$1,661	\$1,720	\$60**	\$1,508	\$1,722	\$214**	-\$154**	\$1,604	\$1,684	\$80**	-\$20#	-\$87
Collection Charges†	\$42	\$14	-\$28**	\$24	\$34	\$10**	-\$38**	\$23	\$24	\$1	-\$29**	-\$34
Total Charges	\$1,703	\$1,735	\$32**	\$1,531	\$1,755	\$224**	-\$192**	\$1,628	\$1,708	\$80**	-\$48**	-\$120
Cash Payments	\$1,298	\$934	-\$363**	\$1,445	\$1,438	-\$7	-\$356**	\$1,441	\$1,489	\$49**	-\$412**	-\$384
OnTrack Credits	\$0	\$731	\$731**	\$0	\$0	\$0	\$731**	\$0	\$0	\$0	\$731**	\$731
LIHEAP Credits	\$18	\$14	-\$3#	\$15	\$27	\$12**	-\$15**	\$129	\$167	\$37**	-\$40**	-\$28
Other Assistance‡	\$25	\$3	-\$22**	\$12	\$19	\$7**	-\$29**	\$57	\$42	-\$14**	-\$8**	-\$19
Other Credits	\$35	\$16	-\$19**	\$7	\$33	\$26**	-\$45**	\$11	\$14	\$4**	-\$23**	-\$34
Total Credits	\$1,375	\$1,698	\$323**	\$1,479	\$1,518	\$39**	\$284**	\$1,637	\$1,713	\$76**	\$247**	\$266
# Cash Payments	8.2	10.1	1.9**	9.6	8.9	-0.7**	2.6**	8.0	7.8	-0.2**	2.1**	2.4
Cash Coverage Rate	77%	94%	17%**	94%	83%	-12%**	29%**	86%	84%	-1%*	18%**	24%
Total Coverage Rate	84%	98%	15%**	99%	89%	-10%**	25%**	104%	103%	-1%	16%**	21%
Shortfall	\$327	\$36	-\$291**	\$53	\$237	\$184**	-\$475**	-\$9	-\$5	\$5	-\$296**	-\$386
Arrears Forgiveness	\$0	\$539	\$539**	\$0	\$0	\$0	\$539**	\$0	\$0	\$0	\$539**	\$539
Beginning Balance	\$470	\$959	\$489**	\$314	\$374	\$60**	-\$429**	\$440	\$424	-\$16#	\$505**	\$467
Ending Balance	\$799	\$457	-\$343	\$373	\$609	\$237**	-\$580**	\$438	\$422	-\$16#	-\$327**	-\$454

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

†“Collection Related Charges” include Late Payment, Reconnect, and Returned Item Charges

‡“Other Assistance Credits” include CARES, LIHEAP crisis, and Operation HELP Credits.

Table VIII-11B displays the same results for Electric Heating customers. The table shows the following results.

- OnTrack participants increased the number of cash payments made from an average of 8.5 in the year prior to OnTrack participation to 9.9 in the year following OnTrack enrollment. This represented an increase of 1.8 payments compared to the comparison groups.
- OnTrack participants increased their total payments and credits in the year following enrollment as the decline in cash payments and other credits was smaller than the amount of OnTrack credits received.

- The total coverage rate for OnTrack participants increased from 83 percent in the year prior to OnTrack enrollment to 104 percent in the year following enrollment. The comparison groups had a reduction in their coverage rate, so the net change was an increase in the total coverage rate of 26 percentage points.
- OnTrack Electric Heating participants received an average of \$720 in arrearage forgiveness in the year following enrollment.
- The balance of OnTrack participants declined by \$642 as compared to the comparison groups.

**Table VIII-11B
Payment Impacts
Electric Heating Customers**

	Treatment Group			Comparison Groups								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
# of Customers	2,035			1,638				5,396				
Electric Charges	\$2,275	\$2,450	\$175**	\$2,027	\$2,336	\$309**	-\$134**	\$1,991	\$2,149	\$159**	\$16	-\$59
Collection Charges[†]	\$42	\$13	-\$29**	\$22	\$31	\$9**	-\$38**	\$17	\$19	\$2**	-\$31**	-\$35
Total Charges	\$2,317	\$2,464	\$147**	\$2,049	\$2,367	\$318**	-\$171**	\$2,008	\$2,168	\$160**	-\$13	-\$92
Cash Payments	\$1,641	\$1,303	-\$337**	\$1,854	\$1,891	\$36**	-\$373**	\$1,716	\$1,865	\$149**	-\$486**	-\$430
OnTrack Credits	\$0	\$1,054	\$1,054**	\$0	\$0	\$0	\$1,054**	\$0	\$0	\$0	\$1,054**	\$1,054
LIHEAP Credits	\$97	\$89	-\$8**	\$91	\$125	\$34**	-\$42**	\$189	\$215	\$26**	-\$34**	-\$38
Other Assistance[‡]	\$43	\$6	-\$37**	\$16	\$19	\$3	-\$40**	\$35	\$32	-\$3	-\$34**	-\$37
Other Credits	\$46	\$29	-\$17**	\$12	\$51	\$39**	-\$56**	\$9	\$16	\$7**	-\$24**	-\$40
Total Credits	\$1,827	\$2,481	\$654**	\$1,974	\$2,086	\$112**	\$542**	\$1,948	\$2,128	\$180**	\$474**	\$508
# Cash Payments	8.5	9.9	1.5**	10.0	9.5	-0.6**	2.1**	9.0	9.0	0.1	1.4**	1.8
Cash Coverage Rate	71%	92%	20%**	89%	79%	-10%**	30%**	83%	84%	1%	19%**	25%
Total Coverage Rate	83%	104%	21%**	100%	91%	-9%**	30%**	102%	102%	< 1%	21%**	26%
Shortfall	\$491	-\$17	-\$507**	\$75	\$281	\$206**	-\$713**	\$60	\$40	-\$20 [#]	-\$487**	-\$600
Arrears Forgiveness	\$0	\$720	\$720**	\$0	\$0	\$0	\$720**	\$0	\$0	\$0	\$720**	\$720
Beginning Balance	\$590	\$1,338	\$747**	\$335	\$423	\$88**	\$659**	\$333	\$397	\$65**	\$682**	\$671
Ending Balance	\$1,082	\$602	-\$481**	\$417	\$700	\$283**	-\$764**	\$404	\$442	\$38**	-\$519**	-\$642

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

[†] "Collection Related Charges" include Late Payment, Reconnect, and Returned Item Charges

[‡] "Other Assistance Credits" include CARES, LIHEAP crisis, and Operation HELP Credits.

Table VIII-12A displays the total bill coverage rate in the pre and post period for the Treatment Group and the comparison groups. The table shows that there was an increase in

the percent of both the Electric Non-Heating and Electric Heating OnTrack participants that paid their full bill, as compared to a decline for the Later Participant Comparison Group. While 25 percent of Electric Non-Heating OnTrack participants paid their full bill in the year prior to OnTrack enrollment, 59 percent did so in the year following enrollment. While 43 percent of these customers paid 90 percent or more of their bill in the year prior to OnTrack enrollment, 80 percent did so in the year following enrollment.

Table VIII-12A
Analysis of Total Bill Coverage Rates

Coverage Rate	Non-Electric Heating						Electric Heating					
	Treatment Group		Comparison Group				Treatment Group		Comparison Group			
			Later Participants		Nonparticipants				Later Participants		Nonparticipants	
	Pre	Post	Pre	Post	Pre	Post	Pre	Post	Pre	Post	Pre	Post
Observations	3,148		2,416		3,302		2,035		1,638		5,396	
≥100%	25%	59%	58%	33%	56%	60%	23%	67%	58%	38%	56%	61%
90%-99%	18%	21%	20%	21%	19%	18%	21%	17%	22%	23%	21%	19%
80%-89%	19%	9%	10%	18%	11%	10%	18%	6%	10%	17%	11%	9%
< 80%	39%	12%	13%	28%	14%	13%	38%	9%	10%	22%	11%	11%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Mean Rate	84%	98%	99%	89%	104%	103%	83%	104%	100%	91%	102%	103%

Table VIII-12B displays the total bill coverage rate in the pre and post period for the Treatment Group with Full Year OnTrack Participation and the Treatment Group with All OnTrack Credits. The table shows that these customers were more likely to pay their full OnTrack bills than those who did not remain in the program for a full year.

Table VIII-12B
Treatment Group
Analysis of Total Bill Coverage Rates
Customers with Full-Year OnTrack Participation or All OnTrack Credits

Coverage Rate	Full-Year Participants				Received All OnTrack Credits			
	Non-Electric Heating		Electric Heating		Non-Electric Heating		Electric Heating	
	Pre	Post	Pre	Post	Pre	Post	Pre	Post
Observations	2,354		1,663		1,281		557	
≥100%	26%	66%	24%	75%	28%	63%	23%	69%
90%-99%	19%	22%	24%	16%	18%	23%	21%	19%

Coverage Rate	Full-Year Participants				Received All OnTrack Credits			
	Non-Electric Heating		Electric Heating		Non-Electric Heating		Electric Heating	
	Pre	Post	Pre	Post	Pre	Post	Pre	Post
Observations	2,354		1,663		1,281		557	
80%-89%	20%	8%	19%	5%	19%	9%	20%	7%
< 80%	35%	4%	33%	4%	36%	5%	36%	5%
Total	100%	100%	100%	100%	100%	100%	100%	100%
Mean Coverage Rate	85%	102%	85%	108%	85%	99%	83%	103%

Table VIII-13 shows the percent of Electric Heating customers who received LIHEAP assistance in the pre- and post-enrollment periods. The table shows that 32 percent of the Treatment Group received LIHEAP in the pre-enrollment period and 31 percent received LIHEAP in the post-enrollment period. PPL should continue to work with customers to ensure that they apply for and receive assistance.

**Table VIII-13
LIHEAP Receipt
Electric Heating Customers**

LIHEAP Receipt	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	2,035			1,638				5,396				
Percent Received LIHEAP	32%	31%	-1%	32%	41%	9%**	-10%**	53%	55%	2%#	-3%#	-7%
Mean LIHEAP Grant – All	\$97	\$89	-\$8*	\$91	\$125	\$34**	-\$42**	\$189	\$215	\$26**	-\$34**	-\$38
Mean LIHEAP Grant – Received in Pre or Post	\$250	\$229	-\$21*	\$203	\$280	\$77**	-\$98**	\$259	\$294	\$35**	-\$56**	-\$77

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Arrearage Forgiveness

This section examines the arrearage forgiveness that was received by OnTrack participants. Table VIII-14 shows that 77 percent of 2018 OnTrack participants received arrearage forgiveness averaging \$263. The mean number of arrearage forgiveness payments received was 5.4. However, some of these customers may not have had arrearages when they began participating in OnTrack or may have participated for long enough prior to 2018 that they already had all of their arrearages forgiven. The table shows that among those 2018 participants with arrearages, more than 99 percent received forgiveness and the mean amount received was \$365.

Most of the Treatment Group had arrearages and 96 percent received forgiveness averaging \$610. Customers in the Treatment Group who participated in OnTrack for the full year and

had arrearages received an average of 10.6 arrearage forgiveness payments, and customers in the Treatment Group with arrearages who received all OnTrack credits received an average of 11 arrearage forgiveness credits.

**Table VIII-14
All 2018 OnTrack Participants and Treatment Group
Arrearage Forgiveness Received**

	Obs.	% Received Arrearage Forgiveness	Mean # Arrearage Forgiveness Payments	Mean Forgiven	Median Forgiven
Forgiveness Received in 2018					
All 2018 Participants	52,234	77%	5.4	\$263	\$107
2018 Participants with Arrears	35,835	> 99%	7.2	\$365	\$201
2018 Full Year CAP	17,981	75%	6.0	\$253	\$98
2018 Full Year CAP with Arrears	16,311	> 99%	8.2	\$360	\$202
2018 All OnTrack Credits	13,045	71%	6.3	\$212	\$64
2018 All OnTrack Credits with Arrears	8,254	100%	9.2	\$325	\$176
Forgiveness Received in Year after Enrollment					
Treatment Group	5,183	96%	9.9	\$610	\$376
Treatment Group with Arrearages	4,911	100%	10.4	\$641	\$397
Treatment Group – Full Year OnTrack	4,017	95%	10.0	\$535	\$335
Treatment Group – Full Year OnTrack with Arrears	3,778	100%	10.6	\$568	\$362
Treatment Group – All OnTrack Credits	1,768	96%	10.5	\$541	\$347
Treatment Group – All OnTrack Credits with Arrears	1,743	100%	11.0	\$569	\$366

Note: 644 accounts were excluded from the All 2018 Participants analysis due to receiving multiple credits at the beginning of the analysis period that were missed from previous bills prior to the analysis period.
Obs. refers to the number of observations.

Table VIII-15 displays the percent of the Treatment Group that received arrearage forgiveness at three, six, nine, and 12 months following OnTrack enrollment. The table shows that the percentage that received arrearage forgiveness declined over the year for all groups, even for those who received all OnTrack credits.

Table VIII-15
Percent Received Arrearage Forgiveness Each Month Following Enrollment
Treatment Group

	Obs.	Months After Enrollment			
		3	6	9	12
All Treatment Group	5,183	85%	77%	70%	61%
Treatment Group - Full Year CAP	4,017	87%	80%	74%	65%
Treatment Group - All OnTrack Credits	1,838	86%	81%	77%	73%
Treatment Group - All OnTrack Credits with Arrears	1,702	90%	84%	81%	76%

Obs. refers to the number of observations.

Collections Impacts

This section examines the impacts of OnTrack participation on collections actions and costs. It is expected that customers who participate in the program will have an increased ability to meet their bill payment obligations and will have better payment compliance, leading to fewer collections actions and reduced collections costs.

Table VIII-16A shows that customers experienced a reduction in the number of calls/messages/reminders, notices, payment agreements, and terminations following enrollment in OnTrack.

Table VIII-16A
Collection Impacts – Number of Actions

	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	5,183			4,054				8,698				
Call/Message/Reminder	12.5	11.7	-0.8**	8.4	10.2	1.9**	-2.7**	10.4	10.2	-0.2**	-0.6**	-1.7
Letter	< 0.1	1.0	1.0**	< 0.1	< 0.1	< 0.1**	1.0**	< 0.1	< 0.1	< 0.1**	1.0**	1.0
Notice	4.0	2.4	-1.6**	2.4	3.3	0.9**	-2.5**	3.1	3.3	0.2**	-1.8**	-2.2
Payment Agreement	5.2	1.0	-4.2**	3.2	4.2	1.0**	-5.2**	4.2	4.2	0.1	-4.3**	-4.8
Termination	0.2	0.1	-0.1**	0.1	0.1	< 0.1**	-0.1**	0.1	0.2	< 0.1**	-0.1**	-0.1

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table VIII-16B displays the percent of 2017-2018 OnTrack enrollees who received one or more service terminations in the year prior to enrollment and the year following enrollment. The table shows that while 15 percent were terminated in the year prior to enrollment, seven percent were terminated in the year following enrollment. Both comparison groups had an increase in service terminations, so the net change was a reduction of ten percentage points.

Table VIII-16B
Collection Impacts – Percent of Customers Terminated

	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	5,183			4,054				8,698				
Termination	15%	7%	-8%**	8%	10%	2%**	-10%**	11%	13%	2%**	-10%**	-10%

Table VIII-17 shows that OnTrack participants also experienced a reduction in collections costs. Collections costs for OnTrack participants declined from an average of \$254 in the year prior to enrollment to \$164 in the year following enrollment. The comparison groups increased their collections costs, so the net change was a reduction of \$118 in collections costs.

Table VIII-17
Collection Impacts – Cost of Actions

	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	5,183			4,054				8,698				
Call/Message/Reminder	\$85	\$80	-\$5**	\$57	\$70	\$13**	-\$18**	\$71	\$70	-\$1**	-\$4**	-\$11
Letter	< \$1	< \$1	< \$1**	< \$1	< \$1	< \$1**	< \$1**	< \$1	< \$1	< \$1**	< \$1**	< \$1
Notice	\$122	\$73	-\$50**	\$73	\$101	\$28**	-\$78**	\$96	\$103	\$8**	-\$58**	-\$68
Payment Agreement	\$36	\$7	-\$29**	\$22	\$29	\$7**	-\$36**	\$28	\$29	< \$1	-\$29**	-\$33
Termination	\$10	\$4	-\$6**	\$5	\$7	\$2**	-\$8**	\$7	\$9	\$2**	-\$8**	-\$8
Total Cost	\$254	\$164	-\$89**	\$157	\$207	\$50**	-\$139**	\$202	\$211	\$8**	-\$97**	-\$118

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Maximum Credit Analysis

PPL has maximum credit levels for OnTrack participants as a cost control mechanism. The 18-month OnTrack credit limits by customer type and poverty level are displayed in Table VIII-18.

**Table VIII-18
Maximum Credit, By Household Income and Account Classification**

Poverty Level	Maximum Credit (18-Month Period)	
	Non-Electric Heating	Electric Heating
0% - 50%	\$1,585	\$4,027
51% - 100%	\$1,441	\$3,661
101% - 150%	\$1,310	\$3,328

When a customer reaches the maximum credit, the customer is transferred to OnTrack Budget Billing (OTBB) and will not receive credits until the 18-month period ends and the customer recertifies for OnTrack.

The analysis in this section examines the percent of customers who reached the maximum credit on or before the 18th month of OnTrack participation. We examined customers who enrolled or recertified in OnTrack in April 2018, because the current maximum credit levels were implemented in mid-March 2018. This poses a challenge for the analysis, because the billing data only extended through early September 2019. As such, these customers would have 17 months of data at most, or 18 months of data if they had a bill in early September 2019.

Customers who were removed from OnTrack prior to reaching the maximum credit amount (or prior to September 2019 if they did not receive the maximum credit amount) were excluded from this analysis because they did not have a full program participation history. However, customers who reached the maximum credit amount prior to being removed from OnTrack are included in the analysis.

Table VIII-19 shows that there were 3,545 customers who enrolled or recertified in OnTrack in April 2018 and 3,443 of these customers received at least one OnTrack credit following this enrollment or recertification. Of these customers, 3,114 were not removed prior to reaching the maximum credit or the end of their billing data.

**Table VIII-19
Maximum Credit Analysis Data Attrition**

Exclusion Reason	Non-Electric Heating	Electric Heating	Total
Included in Program Data	76,256	67,432	143,688
Enrolled or Recertified in April 2018	1,799	1,746	3,545
Received One+ OnTrack Credits After Enrollment/Recertification	1,758	1,685	3,443
All Eligible	1,758	1,685	3,443
Not Removed Prior to Reaching Max Credit or Billing Data End	1,590	1,524	3,114
Final Analysis Group	1,590	1,524	3,114
Final Analysis Group With At Least 16 Months of Billing Data	1,085	942	2,027

Table VIII-20 displays the percentage of customers who reached the maximum credit. The table shows that of those with at least 16 months of data, 28 percent of Non-Electric Heating customers and three percent of Electric Heating customers reached the maximum credit. The percentage would be higher if enough data were available to show the analysis in the 17th and 18th month.

Customers at or below 50 percent of the poverty level were most likely to reach the maximum credit. Almost half of the Non-Electric Heating customers with income at or below 50 percent of the poverty level reached the maximum credit, compared to seven percent of the Electric Heating customers at this income level.

**Table VIII-20
Percent of Customers Who Received Maximum Credit**

All Customers						
Poverty Level	Non-Electric Heating		Electric Heating		All	
	Obs.	Reached Max	Obs.	Reached Max	Obs.	Reached Max
0% - 50%	294	38%	256	7%	550	24%
51% - 100%	765	24%	724	3%	1,489	14%
101% - 150%	531	18%	544	2%	1,075	9%
Total	1,590	25%	1,524	3%	3,114	14%
Customers with At Least 16 Months of Billing Data						
Poverty Level	Non-Electric Heating		Electric Heating		All	
	Obs.	Reached Max	Obs.	Reached Max	Obs.	Reached Max
0% - 50%	194	47%	139	7%	333	31%
51% - 100%	522	28%	461	3%	983	16%
101% - 150%	369	19%	342	2%	711	11%

All Customers						
Poverty Level	Non-Electric Heating		Electric Heating		All	
	Obs.	Reached Max	Obs.	Reached Max	Obs.	Reached Max
Total	1,085	28%	942	3%	2,027	17%

Obs. refers to the number of observations.

Table VIII-21A displays the month at which the customer reached the maximum credit. The table shows that four percent of Non-Electric Heating customers reached the maximum credit before ten months following enrollment or recertification, 11 percent between ten and twelve months, seven percent between 13 and 15 months, and six percent between 16 and 18 months.

**Table VIII-21A
Month of Maximum Credit Receipt
By Service Type**

# of Months After Enrollment	Non-Electric Heating		Electric Heating	
	All	Had ≥16 Months of Billing Data	All	Had ≥16 Months of Billing Data
Observations	1,590	1,085	1,524	942
< 10 Months	4%	4%	< 1%	< 1%
10-12 Months	10%	11%	1%	2%
13-15 Months	5%	7%	1%	1%
16-18 Months	5%	6%	1%	1%
Did Not Reach Maximum Credit	75%	72%	97%	97%
Total	100%	100%	100%	100%

Table VIII-21B displays the month at which the customer reached the maximum credit by poverty level. The table shows that six percent of the Non-Electric Heating participants with at least 16 months of data and income at or below 50 percent of the poverty level reached the maximum credit in less than ten months, 17 percent reached the maximum credit between ten and 12 months, 14 percent reached the maximum credit between 13 and 15 months, and 11 percent reached the maximum credit between 16 and 18 months.

**Table VIII-21B
Month of Maximum Credit Receipt
By Poverty Level and Service Type**

All Customers						
# of Months After Enrollment	Non-Electric Heating			Electric Heating		
	≤50%	51-100%	101-150%	≤50%	51-100%	101-150%
Observations	294	765	531	256	724	544
< 10 Months	6%	5%	2%	0%	< 1%	< 1%
10-12 Months	15%	9%	7%	4%	1%	< 1%
13-15 Months	10%	5%	3%	2%	1%	1%
16-18 Months	7%	5%	5%	2%	< 1%	1%
Did Not Reach Maximum Credit	62%	76%	82%	93%	97%	98%
Total	100%	100%	100%	100%	100%	100%
Customers with At Least 16 Months of Billing Data						
# of Months After Enrollment	Non-Electric Heating			Electric Heating		
	≤50%	51-100%	101-150%	≤50%	51-100%	101-150%
Observations	194	522	369	139	461	342
< 10 Months	6%	5%	2%	0%	0%	< 1%
10-12 Months	17%	11%	9%	4%	2%	< 1%
13-15 Months	14%	6%	4%	1%	1%	1%
16-18 Months	11%	5%	5%	1%	< 1%	1%
Did Not Reach Maximum Credit	53%	72%	81%	93%	97%	98%
Total	100%	100%	100%	100%	100%	100%

C. Summary

This section of the report provided an analysis of the impacts of the PPL Universal Service Programs. OnTrack participants received credits that resulted in increased affordability, more regular payments, greater bill coverage rates, and reduced collections actions and costs. We also analyzed the percent of customers who reached the maximum credit and the number of months that it took for those customers to reach the maximum credit.

OnTrack Participation and Credits

- Full Year Participants: 46 percent of all customers who participated in OnTrack in 2018 were in OnTrack for the full year. Within the Treatment Group, 78 percent were in OnTrack for the full year following their 2017-2018 enrollment. A smaller percentage, 25 percent of All 2018 Participants and 35 percent of the Treatment Group, received 12 months' worth of OnTrack credits.

- **OnTrack Credits:** All 2018 Electric Non-Heating participants received an average of eight credits in 2018 and the full year participants received an average of 9.8 credits. Full year participants received an average of \$684 in credits. Full year Electric Heating participants received an average of \$1,166 in credits.
- **Mean Percent Discount:** Both Electric Non-Heating and Electric Heating 2017-2018 enrollees who remained in OnTrack for the full year received a mean discount of about 40 percent, those who received all of the credits received a mean discount of about 50 percent. Customers with household income at or below 50 percent of the poverty level received an average discount of 59 percent.

Affordability Impacts

- **Energy Burden:** The Electric Non-Heating Treatment Group received an average OnTrack credit of \$731 which reduced their mean energy burden from 13 percent to seven percent. The Electric Heating Treatment Group received an average OnTrack credit of \$1,054 which reduced their mean energy burden from 17 percent to ten percent.
- **PUC Targeted Burden:** The Pennsylvania Public Utility Commission (PUC) has specified targeted energy burden levels for customers who participate in Customer Assistance Programs (CAP). However, the PUC also has specified cost control measures that may prevent customers who reach maximum discount levels or who have minimum payment levels to reach these affordability targets.

A large percentage of customers still had an energy burden above the PUC target in the year following OnTrack enrollment, especially those with income at or below 50 percent of the poverty level. While 76 percent of Non-Electric Heating customers with income at or below 50 percent of poverty had a burden that exceeded the PUC target, 47 percent of Electric Heating participants at or below 50 percent of poverty had a burden that exceeded the PUC target.

Payment Impacts

- **Number of Payments:** Electric Non-Heating participants increased the number of cash payments made from 8.2 in the year prior to OnTrack participation to 10.1 in the year following participation, and Electric Heating participants increased the number of cash payments made from an average of 8.5 in the year prior to OnTrack participation to 9.9 in the year following OnTrack enrollment.
- **Total Coverage Rate:** Electric Non-Heating participants increased their total coverage rate (the percent of the bill covered by cash and assistance payments) from 84 percent in the year prior to OnTrack enrollment to 98 percent in the year following enrollment. Electric Heating participants increased their total coverage rate from 83 percent in the year prior to OnTrack enrollment to 104 percent in the year following enrollment.

- **Balance:** Electric Non-Heating participants reduced their balance by \$454 as compared to the comparison groups. Electric Heating participants reduced their balance by \$642 as compared to the comparison groups.
- **LIHEAP:** While 32 percent of Electric Heating customers received LIHEAP assistance in the pre-enrollment year, 31 percent received LIHEAP in the year following OnTrack enrollment.

Arrearage Forgiveness

- **Arrearage Forgiveness Received:** Among those 2018 participants with arrearages, more than 99 percent received forgiveness and the mean amount received was \$365. Customers in the Treatment Group who participated in OnTrack for the full year and had arrearages received an average of 10.6 arrearage forgiveness payments totaling an average of \$568.

Collections Impacts

- **Collections Actions:** Customers experienced a reduction in the number of calls/messages/reminders, notices, payment agreements, and terminations following enrollment in OnTrack. While 15 percent of the OnTrack enrollees were terminated in the year prior to enrollment, seven percent were terminated in the year following enrollment.
- **Collections Costs:** Collections costs for OnTrack participants declined from an average of \$254 in the year prior to enrollment to \$164 in the year following enrollment. The comparison groups increased their collections costs, so the net change was a reduction of \$118 in collections costs.

Maximum Credits

- **Maximum OnTrack Credit:** Of those with at least 16 months of data, 28 percent of Non-Electric Heating customers and three percent of Electric Heating customers reached the maximum OnTrack credit. The percentage would be higher if enough data were available to show the analysis in the 17th and 18th month.

Customers at or below 50 percent of the poverty level were most likely to reach the maximum credit. Almost half of the Non-Electric Heating customers with income at or below 50 percent of the poverty level reached the maximum credit, compared to seven percent of the Electric Heating customers at this income level.

IX. Findings and Recommendations

This section of the report provides findings and recommendations based on the evaluation research. The programs have positive impacts for participants. OnTrack participants have improved energy affordability, bill payment, and reduced collections costs. WRAP participants achieve significant energy savings. Operation HELP and CARES provide critical assistance to program participants. We provide recommendations for improving program administration, increasing efficiency, and achieving even greater impacts.

A. OnTrack

Key findings with respect to OnTrack are as follows.

1. OnTrack has positive impacts for participants. Following OnTrack enrollment, customers increased the number of cash payments made, bill coverage rates improved, energy burden declined, and customers had reduced collections actions and costs. The OnTrack participant survey showed that customers felt their bill was much less difficult to pay, they were much less likely to have problems meeting their other needs, and most participants reported that OnTrack had been very important in helping them to meet their needs.
2. The OnTrack participant survey showed that 51 percent of participants were aware of the OnTrack credit limit and 42 percent reported that they received a letter from PPL about the limit. Of those who were aware of the letter, 70 percent reported that they changed their usage in response.
3. When asked to assess OnTrack, all agencies responded that PPL is very responsive and that the program is working well. All agencies also reported that clients are generally happy with OnTrack.
4. Customers indicated low levels of difficulty with application and recertification, and high satisfaction with the program. While 93 percent reported that enrollment was very easy or somewhat easy, 91 percent reported that recertification was very easy or somewhat easy. Ninety percent said they were very satisfied with OnTrack and ten percent said they were somewhat satisfied.
5. OnTrack provides many referrals to customers to help them meet additional needs. All agencies reported that they provide customers with referrals to other programs when they discuss their OnTrack application. The most common referrals are to LIHEAP and WRAP, but many other types of referrals and information are also provided.

6. Many improvements have been made to OnTrack since the last Universal Service Program Evaluation.
 - Online Application – PPL introduced an online application which has received positive reviews from PPL staff, agency staff, and customers. Ten percent of current PPL customers reported that they applied for OnTrack online, and this percentage is likely to increase over time, as some of the current OnTrack participants enrolled before the online application was introduced.
 - Payment Troubled Definition – PPL removed the requirement that customers must have defaulted on a payment agreement in the past 12 months to be eligible for OnTrack. This has reduced barriers to OnTrack enrollment and opened up the program to customers who are challenged by their bill even if they have not defaulted on a payment agreement.
 - Alternative Suppliers – The previous evaluation found that the majority of OnTrack participants used Alternate Suppliers and they paid higher prices than those who did not. Additionally, the use of Alternate Suppliers led to a higher OnTrack credit as compared to OnTrack participants who did not use Alternate Suppliers. Many OnTrack participants were not aware that they had an Alternate Supplier or that their costs were higher than the price to compare.

OnTrack participants are now only permitted to select from suppliers that offer rates lower than PPL's price to compare. Customers are no longer working with suppliers because no suppliers are offering such a rate.

OnTrack recommendations are made with respect to program design, outreach and enrollment, and customer bills.

OnTrack Design Recommendations

1. Review the maximum credit levels, especially for Non-Electric Heating customers with income at or below 50 percent of the poverty level, and consider an increase in the amount.

PPL revised their maximum credit to allow for higher credits for lower poverty level group participants. However, the evaluation found that overall 28 percent of Non-Electric Heating customers and three percent of Electric Heating customers reached the maximum OnTrack credit. (Only 16 months of data were available, and the percentage would be higher if enough data were available to show the analysis in the 17th and 18th month). Customers at or below 50 percent of the poverty level were most likely to reach the maximum credit. Almost half of the Non-Electric Heating customers with income at or below 50 percent of the poverty level reached the maximum credit, compared to seven percent of the Electric Heating customers at this income level.

2. Review payment calculations to reduce the percentage of customers who reach the maximum credit.

Given the large percentage of customers who exceed the maximum credit, some fewer than ten months into the 18-month program, and many by a significant amount, PPL should reassess how the payment is calculated with the goal of reducing this issue. An additional option is to adjust the customer's payment periodically if it appeared that the customer would be exceeding the credit limit. The system could automatically change the payment amount and send a letter to the customer.

3. Address defacto heating customers.

The maximum credit overage is much more prevalent in the Electric Non-Heating customers. This may be due to the fact that some of these customers are using defacto electric heating. PPL should assess the usage patterns of high-usage electric heating customers, and try to coordinate with the gas company and/or WAP to assist these customers with their gas heating systems if needed.

4. Reassess the OnTrack Budget Billing (OTBB) payment.

OnTrack customers who reach their maximum credit are transitioned to OTBB and are often unable to pay the much higher budget billing amount. They are charged the budget bill even if it is higher than their actual usage until their arrearages are paid off. A possible solution is to give these customers the option of paying the lower of their budget bill or actual usage amount.

5. Review energy burdens that result from the OnTrack payment plans, and consider revisions to the calculations.

The evaluation found that a large percentage of OnTrack participants still had an energy burden above the PUC target in the year following OnTrack enrollment, especially those with income at or below 50 percent of the poverty level. While 76 percent of Non-Electric Heating customers with income at or below 50 percent of poverty had a burden that exceeded the PUC target, 47 percent of Electric Heating participants at or below 50 percent of poverty had a burden that exceeded the PUC target. Part of the overage is due to the maximum credit, but it also is due to the payment calculation.

6. Reassess the OnTrack program length.

PPL moved to an 18-month OnTrack program with the most recent Universal Service Plan. This is confusing for PPL staff, agencies, and participants, as it is usual to think about a one-year period, both in terms of reaching the maximum credit and in terms of the timeline for recertification. Moving to a 12-month or 24-month program cycle would reduce confusion.

7. Review customers' accounts at the time of recertification and advise customers who have not received LIHEAP to apply.

One agency reported that at the time of recertification they review the customer's usage over the last 18 months and check if electric heating customers have applied to LIHEAP. If the customer has not applied to LIHEAP and the agency is able to speak with the customer at the time of recertification, they will advise the customer to apply for the program. PPL should institutionalize this process so it is done regularly by PPL staff or agency staff. This would increase the percentage of customers who receive LIHEAP.

Outreach and Enrollment Recommendations

1. Improve documentation of OnTrack guidelines.

Three of the seven OnTrack agencies reported that the OnTrack application instructions should be improved. The application should clearly state why the income documentation is necessary, how the income documentation can be provided, and what exactly is required. The application should also clearly state that customers should list all household members, including themselves and non-income earning members, on the application.

2. Provide the printed OnTrack application in Spanish.

The Needs Assessment found that approximately 12 percent of income-eligible households in PPL's service territory speak Spanish at home and 24 percent speak Spanish at home in the Lehigh region. Agency staff also reported that they encounter many households whose primary language is Spanish. (Note that the PPL website is available in Spanish. A customer can read about the programs and apply online in Spanish.)

3. Assist agencies with income calculation.

PPL staff reported that they find mistakes in agency calculations of the customers' annual income. PPL should provide clear instructions for this calculation. Additionally, a simple Excel formula that calculates the annual income and poverty level when the caseworkers input the customer's paycheck amount and the frequency of payment could improve accuracy.

4. Provide OnTrack brochures to the agencies.

Three agencies reported that the OnTrack brochure does a good job of explaining the program, and three agencies were not familiar with the brochure. PPL should have brochures available at the agencies.

5. Require better zero income documentation.

PPL staff and agencies expressed concern over zero-income customers and the lack of documentation that is required. The current zero-income form only asks four or five questions and does not require notarization. It is currently less burdensome for customers to report zero income than to provide proof of earned income. Customers who are claiming zero income should be required to provide additional information on their source of support and signed documentation from the individual providing that support.

6. Provide follow-up education about OnTrack for customers who apply online or over the telephone with PPL representatives.

Customers who apply for OnTrack online or over the phone with PPL representatives do not receive in-depth education about the OnTrack program and referrals to other services. PPL should provide a list of these customers to the agencies and require the agencies to hold onboarding meetings or calls with customers following OnTrack enrollment. This will allow agency staff to personally explain the program to the customer and improve understanding of OnTrack requirements and benefits, as well as other assistance that may be available.

7. Rework the maximum credit letters and provide additional education about the maximum credit during OnTrack enrollment.

Agencies reported that customers are confused by the maximum credit letters and by the maximum credit. PPL should provide OnTrack participants with more information on the maximum credit and how their usage affects their benefits, both at the time of enrollment and in these letters.

8. Enhance OnTrack training for call center staff.

Agencies reported that call center staff often provide inaccurate or incomplete information about OnTrack. PPL should consider additional training for these staff.

9. Provide increased coordination of OnTrack with other Universal Service Programs through one online application for all Universal Service Programs.

PPL and agency staff reported that it would be beneficial to have greater coordination between the Universal Service Programs and an online application for Operation HELP in the same system. Customers could fill out one application for assistance that would allow PPL to determine which program(s) would benefit the customer. This would simplify the application process for the customer. Currently, only WRAP and OnTrack have online applications.

10. Increase LIHEAP Outreach to OnTrack participants.

While 32 percent of Electric Heating customers received LIHEAP assistance in the pre-enrollment year, 31 percent received LIHEAP in the year following OnTrack

enrollment. PPL should conduct outreach to OnTrack participants about LIHEAP each season.

Customer Bill Recommendations

1. Include the arrearage forgiveness amount on the customer's bill.

While the impact analysis showed that 77 percent of all 2018 OnTrack participants received arrearage forgiveness, only 27 percent reported that they received arrearage forgiveness and only eight percent were able to estimate the monthly amount.

PPL should consider adding information to the customer's bill that shows the amount of arrears that are forgiven each month. This is important because 88 percent of customers who were aware that they received arrearage forgiveness said that the forgiveness made them more likely to pay their electric bill.

2. Provide visual information on the OnTrack bill on the percent of the maximum credit that has been used to date.

This information may make it clearer to customers when they are in danger of exceeding their maximum OnTrack credit prior to the re-certification date. Agency caseworkers reported that many customers did not appear to understand what the warning letters meant, and such communication may increase customer understanding.

B. Operation HELP

Key findings with respect to Operation HELP are as follows.

1. Operation HELP is an important program that provides emergency assistance to customers who have faced a hardship.
2. Agency caseworkers reported that the Operation HELP guidelines are clear and easy to understand. All ten agencies reported that there are no barriers to application for Operation HELP.
3. Agency caseworkers reported that they provide important services to customers at the time of Operation HELP application. All agencies provide some information about energy conservation to the client at the time of Operation HELP application. This information includes referrals, energy conservations tips, energy kits, and materials about energy conservation. Nine agencies provide customers with referrals at the time of Operation HELP application.

Recommendations for Operation HELP are as follows.

1. Provide additional training and documentation of program guidelines to agencies to increase the consistency in how the program guidelines are applied.

Agencies varied in how they determined if a customer is eligible for the program. Individual agency requirements included a good payment history, demonstration of hardship, or not being shut off (this may be a misunderstanding of program requirements). Only one agency reported that they use the customer's payment history to determine if the customer is eligible for a grant. Another agency reported that they assess whether the customer is truly in a hardship situation to determine if the customer will receive the grant. One agency reported that PPL does not permit agencies to provide Operation HELP grants to customers who have been terminated. Further, agencies are inconsistent in the documentation they require of program applicants and whether customers are required to visit the agency to apply for assistance.

While PPL managers and staff reported that they have difficulty awarding all available Operation HELP funding, agencies reported that they ran out of funding or restricted grants due to a lack of funding. It appears that PPL can work with agencies to distribute additional available grant dollars to customers in need of assistance. PPL should provide guidelines to agencies about use of funds and direct them to request additional funds when their program funds are depleted.

Seven agencies reported that they can provide grants for multiple energy vendors, while three agencies reported that they are not able to do so. PPL should clarify these program guidelines with Operation HELP agencies.

2. Train agencies to coordinate Operation HELP with OnTrack.

One agency reported that staff will automatically process an Operation HELP application for OnTrack applicants above the OnTrack income guidelines. PPL should educate all agencies about this process.

3. Retrain Operation HELP caseworkers about PPL portal access and create a direct phone line to PPL for agency Operation HELP caseworkers.

Several agencies reported that they have had challenges reaching a PPL customer service representative to request assistance with Operation HELP. Agencies also reported that customer service representatives at PPL often do not know how to assist them with Operation HELP issues and that they often must wait on hold for up to ten minutes to reach a representative.

PPL should consider implementing a direct phone line for agency staff or have Operation HELP questions be directed to Universal Service Program staff. They should also re-train staff that they have direct access to PPL's portal and may not need assistance from PPL for many of their questions.

4. Train PPL customer service representatives on Operation HELP guidelines.

Agencies reported that staff do not understand the program or that they refer ineligible customers to Operation HELP.

C. CARES

CARES is working well and providing important benefits to participants. One recommendation for the program is provided below.

1. Encourage caseworkers to refer customers to CARES.

Caseworkers prioritize referrals to OnTrack, so many CARES-eligible customers are not referred to the program. If a customer is potentially eligible for both programs, the customer could be given a hold under CARES while applying to OnTrack. If the customer is unable to enroll in OnTrack, the customer could then receive a CARES credit if eligible.

D. WRAP

Key WRAP findings are summarized below.

1. WRAP has continued to achieve good energy savings. PPL's annual WRAP evaluation for the PUC estimated savings of 10.5 percent for baseload jobs, and 10.4 percent for low cost and full cost jobs in 2017. Many utilities have seen savings decline significantly over the past several years as many of the highest low-income energy users have already received program services. PPL's savings compare positively to other electric utilities as shown in the Pennsylvania Public Utility Commission, Bureau of Consumer Services' 2018 Report on Universal Service Programs and Collections Performance.⁷
2. Health and safety is an important component of WRAP. The analysis showed that 72 percent of baseload jobs, 82 percent of low cost jobs, and 68 percent of full cost jobs received health and safety measures.
3. PPL has maintained a diverse group of skilled nonprofits and contractors to implement their WRAP. Based on comparisons with other research conducted on low-income energy efficiency programs, this system appears to provide higher energy savings than using one contractor to implement the full program.
4. PPL contractors acknowledge the dedication of PPL staff to WRAP. All organizations reported that PPL has been helpful in WRAP implementation, that PPL provides adequate support for the program, and that PPL staff members are available to answer questions. One contractor even reported that the PPL contact shifts her workday in the summer to accommodate the contractor's earlier work hours.
5. PPL has made useful improvements to the WRAP data system. All ten organizations reported that PPL's data system works well, and many noted that it has improved since the last version.

⁷ http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf

Recommendations for WRAP are as follows.

1. Continue to work on increasing coordination with other low-income energy efficiency programs.

Several of the service delivery organizations provide additional utility programs and/or WAP and felt that there are opportunities for improved coordination. PPL should assess how they can be more flexible in the timing of service delivery, such as prioritizing WAP jobs or allowing additional time for customers to be treated by WRAP until they are ready to be served by WAP. Additionally, they could consider providing incentives to organizations to increase coordinated jobs.

2. Provide education for automatically enrolled OnTrack customers.

Since the implementation of automatic enrollment in WRAP for high-usage OnTrack customers, some of the automatically enrolled WRAP participants have been confused about the program. One service delivery organization reported that they are having issues with customers, particularly OnTrack customers, not responding or not knowing what WRAP is when staff call. Additionally, one organization noted that OnTrack customers who are automatically enrolled in WRAP may have been notified of their enrollment without fully understanding what the program is. This indicates that there is room for improvement in how OnTrack customers are educated about WRAP.

3. Adhere to process for including self-addressed, stamped envelope in requests for landlord consent.

These envelopes were traditionally included in the consent requests. Recently, the envelopes have not been included, which has resulted in a lower number of landlord consents.

4. Update the WRAP online system per PPL requests to improve system efficiency.
 - o Add the ability to re-open a WRAP case in the online system instead of having to recreate a case record.
 - o Create the ability for PPL staff to query all database fields.
 - o Make the job closing date the installation date of the final measure and list the inspection date separately. Currently, the job closing date is the inspection date.
5. Return to seven-year WRAP stay-out provision.

PPL previously had a seven-year stay-out provision before customers could receive WRAP services again. In their most recent Universal Service Plan, PPL reduced the stay-out to only three years. This will result in lower WRAP savings, as most customers will not have good energy savings opportunities in such a short time following previous

WRAP treatment. A seven-year stay-out provision will provide greater benefits to WRAP participants.

CERTIFICATE OF SERVICE

(Docket No. M-2016-2554787 and Docket No. P-2019-3007285)

I hereby certify that true and correct copies of the foregoing have 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).

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Harrisburg, PA 17101

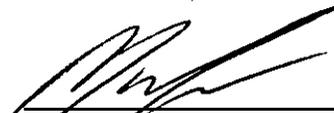
Adelou A. Bakare, Esquire
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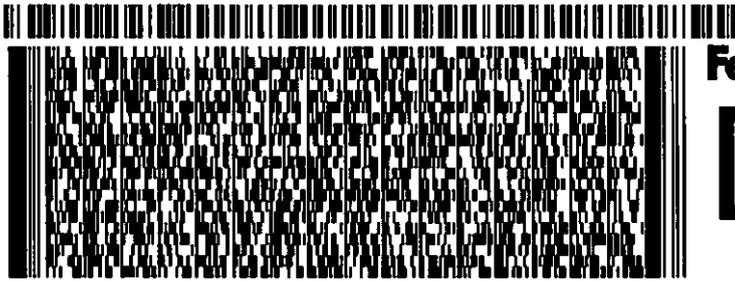
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COMMOMWEALTH KEYSTONE BLDG
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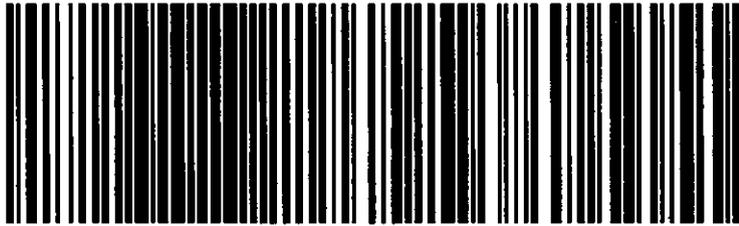


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