

Richard G. Webster, Jr.
Vice President
Regulatory Policy & Strategy

Telephone 215.841.5777
Fax 215.841.6208
www.peco.com
dick.webster@peco-energy.com

PECO
2301 Market Street, S15
Philadelphia, PA 19103

June 12, 2020

VIA E-FILING

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120-3265

**Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information
Docket No. M-2020-3020055**

Dear Secretary Chiavetta:

On May 29, 2020, the Pennsylvania Public Utility Commission (“Commission”) issued a Secretarial Letter directing Pennsylvania utilities to respond, by June 15, 2020¹, to a series information requests regarding COVID-19 Customer Service, Billing, and Public Outreach. Attached to this letter, please find the responses of PECO Energy Company (“PECO”) to the Commission’s Request for Utility Information. In accordance with the Secretarial Letter, PECO is filing this response via the Commission’s e-filing system only.

Due to the pandemic, all PECO attorneys and key support staff are currently working remotely. Accordingly, PECO will not have its usual access to photocopying and U.S. mail, among other services. PECO requests that all communications with PECO be transmitted by email.

Sincerely,



Enclosures

Cc: Sarah Dewey, Bureau of Consumer Services (via email service only)
Tom Charles, Director of Communications (via email service only)

¹ Responses were originally due by June 8th, but the due date for responses was subsequently extended to June 15th.

I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

PECO Response: PECO has been proactive in its response to the global pandemic in order to assist our customers during this unprecedented time. PECO voluntarily suspended terminations and sending termination notices before the Commission's Emergency Order was issued and waived late fees and all disconnect notices. PECO also restored its customers who were without power for \$0 down and provided payment agreements, even if the customer was not otherwise eligible. Additionally, PECO waived reconnect fees and deposits and will be making a filing in the coming weeks to provide additional relief to its low-income customers. PECO has further enhanced its communications with customers, as detailed below in Section II.

PECO has taken other steps to assist its customers and the community. On March 19th, PECO announced it will contribute a total of \$500,000 to the United Way of Greater Philadelphia and Southern New Jersey's PHL COVID-19 Fund, as well as other non-profit and community organizations to support their efforts to provide essential services during the pandemic. On April 14th, PECO announced additional funding to the United Way and local nonprofit organizations to help residents impacted by COVID-19. With this increased funding, PECO and the Exelon Foundation will donate a total of \$1.1 million towards the coronavirus response and relief efforts across the Greater Philadelphia region.¹ Additionally, PECO's employees have continued to support local non-profits, such as Philabundance – the Delaware Valley's largest hunger relief organization – with fundraisers, virtual volunteer activity, and Board services to benefit the region.

Finally, PECO is a long-time supporter of increased LIHEAP funding, and in response to the economic dislocations resulting from the pandemic has engaged with federal and state elected officials to make LIHEAP and other programs that provide direct financial assistance to low-income and economically displaced individuals our advocacy priority.

¹ Contributions have gone to Philadelphia Foundation's PHL COVID-19 Response Fund, the United Way organizations in Bucks, Chester and York Counties, the Montgomery County Anti-Hunger Network and COVID-19 Fund, and the Foundation for Delaware County, as well as critical community partners such as the Salvation Army, Manna, Philabundance, and Project Home.

Termination of Utility Service:

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

PECO Response: If the PUC lifts its Emergency Order on July 1st, PECO intends to begin sending termination notices on July 20th and resume terminations for non-payment on August 3, 2020.

PECO respectfully believes that the termination moratorium for utilities should be lifted in early July so that we may begin managing the credit and collections implications of the COVID-19 pandemic and associated costs. As set forth in this response, PECO believes this process will be implemented in a manner that is sensitive to the health and financial issues facing our customers.

If the moratorium extends beyond August 3rd, PECO may need to implement a more aggressive collections strategy in order to control the uncollectible expense costs in light of the pending winter moratorium.

- How does the utility plan to implement terminations and will it start the process with new termination notices?

PECO Response: PECO will start the termination process at the beginning of the collections cycle. Therefore, beginning no earlier than July 20, 2020, in accordance with Chapter 56, residential customers will receive new 10-day and 72-hour notices prior to termination. In addition to the required notifications, PECO will issue payment reminder letters/emails and perform proactive outbound calls to low-risk customers with a past due balance.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same period in 2019?

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

PECO Response:

	May -20	May - 19	Change
Small C&I	12,040	6,573	5,467
Total Residential	127,793	89,252	38,541
CAP	12,042	10,340	1,702
Low-Income (non-CAP)	13,256	11,514	1,742

PECO has not experienced the increase in enrollment in assistance programs that normally occurs in the spring, likely due to the extended termination moratorium. PECO anticipates, however, an increase in enrollment when the moratorium ends.

- Provide future projections if available.

PECO Response: Future projections are not available.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

PECO Response: Customers who were reconnected during the pandemic have not been assessed reconnect fees. Reconnect fees will be assessed after terminations resume (on August 3rd). Customers wishing to restore service will be required to pay the reconnect fee at the time of restoration by cash, check, or credit/debit card. However, if the customer is eligible for a payment agreement, the reconnect fee can be added to the total arrearage.

Universal Service Programs:

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

PECO Response: No. From March 13 through June 5, 7,433 customers would have been removed from CAP for failure to recertify but instead have remained on CAP.

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

PECO Response: There have been no changes to the current processes. The eligibility requirements for PECO's Hardship Fund are:

- 175% Federal Poverty Level or below;
- Service must be in imminent danger of termination or have already been terminated;
- Grants must bring balance to zero (including private funds and/or soliciting funds from other sources); and
- Customer must not have received a hardship grant from PECO within the last two years

Other Assistance Initiatives:

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

PECO Response: In addition to the termination moratorium, since March 13th, PECO has waived all new late payment charges ("LPCs"), reconnect fees, and deposits (for both new connects and delinquent accounts). Residential customers who would not normally be eligible for a payment agreement have been offered a 0% down, 12-month special payment agreement as part of PECO's COVID-19 response.

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted. Utilities are directed to report this information to Sarah Dewey, sdewey@pa.gov in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

PECO Response: When PECO resumes terminations, PECO will offer the following additional payment agreements:

- Residential: 0% down, 24-month agreement
- Small C&I: with up to 25% down on past-due balances, a 2-month past-due balance deferral with the remaining balance placed on a 6-month agreement

PECO also plans to file for approval of a suite of Low-Income COVID-19 relief programs within the next two weeks. As directed, PECO will report this information to Sarah Dewey upon filing.

II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, thcharles@pa.gov, in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

PECO Response: COVID-19 changed PECO's outreach efforts in two fundamental ways: 1) it eliminated in-person gatherings and 2) it created a new group of low-income customers (that were newly unemployed or underemployed). These changes necessitated a shift in how PECO conducts outreach to our customer base. To that end, PECO created new, innovative outreach methods that eliminate or significantly reduce in-person contact. Specifically, PECO is utilizing the following outreach efforts to notify customers about COVID-19 process changes and assistance efforts:

- Promotion of new customer support policies through three separate news press releases, resulting in multiple message placements in print, radio, and broadcast media;
- Emails sent to PECO's Universal Services Advisory Committee² and to Community Partners / Neighborhood Energy Centers³, which forwarded our messages to their partners and constituents;

² PECO's **Universal Services Advisory Committee** is comprised of Community Legal Services, Public Utility Law Project, Office of Consumer Advocate, Pennsylvania Utility Law Project, Philadelphia Corporation for Aging, Energy Coordinating Agency of Philadelphia, and the following local county assistance offices: Bucks County Opportunity Council; Community Action Agency of Delaware County; Montgomery County Community Action Development Commission; Utility Emergency Services Fund – Philadelphia; and Mason-Dixon Cares of York County.

³ PECO's **Philadelphia Neighborhood Energy Centers/Community Partners** are: ACHIEVEability, Action Wellness, Center in The Park, Coalition of Culturally Competent Providers, CONCILIO, Congreso, Diversified

- Fliers advising of PECO’s COVID-19 policy changes forwarded to our service providers. The flier is designed to allow for the agency to add their logo, thereby promoting PECO’s COVID-19 messaging and also highlighting partnerships with social service agencies/low-income advocates;
- Three email broadcasts detailing payment options, financial assistance, and the disconnect moratorium sent to nearly one million customers;
- Prominent postings on the PECO website including a new webpage dedicated to the COVID-19 pandemic response;
- Regular postings to Facebook, Twitter, and Nextdoor social media feeds;
- Radio interview spots with the PECO community engagement manager on customer support policies, payment options, and financial assistance;
- Virtual Town Halls and webinars sponsored by elected officials and other community partners/social service agencies;
- Direct outbound calls to groups of customers regarding PECO service restoration efforts, CAP Recertification, LIHEAP, and CAP;
- Added Interactive Voice Response (“IVR”) on-hold messaging advising callers how to access information and get assistance;
- Enabled CAP enrollment sites, located throughout our service territory, to provide virtual assistance to our low-income customer base;
- Posters with tear-off information advising customers of LIHEAP stimulus funding to be posted in approximately 300 high traffic locations (i.e. supermarkets, convenience stores, etc.) in communities throughout PECO’s service territory (beginning the week of June 15th); and
- Train-the-Trainers programs for the staff of community partners, service agencies, and hospitals.

In addition, on March 27 and May 13, PECO President and CEO Mike Innocenzo held conference calls with municipal and elected officials to provide updates on PECO’s response to the pandemic and its economic disruption. As part of those calls, he described in detail PECO’s customer assistance efforts, including providing information and offers of collaboration to communicate with customers on the availability of PECO programs, LIHEAP funding and assistance available through community partner organizations. PECO is also collaborating with the City of Philadelphia through social media on efforts to promote LIHEAP applications.

Communities Services – Dixon House, Germantown Crisis Ministries, GPASS, HACE, Hunting Park Community Development Corp, Mount Vernon Manor, New Kensington, Nicetown Community Development Corp, People’s Emergency Center, Southwest Community Development Corp, Strawberry Mansion, United Communities of SE Philadelphia, Urban League of Philadelphia, and We Never Say Never.

- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

PECO Response: See response above; PECO has also endeavored to reach its utility customers via the following:

- Customer bill inserts;
 - Energy at Home customer newsletter;
 - Energy at Work customer newsletter;
 - PECO Website;
 - PECO website page for small business crisis funding resources;
 - Social media postings on Twitter, Facebook and Nextdoor;
 - Press releases;
 - Radio advertising; and
 - Customer email broadcast promoting financial assistance programs at www.peco.com/help.
- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

PECO Response: To make customers aware of proceedings, PECO continues to use its longstanding practice of placing many of these filings on its website. For example, for PECO’s current Default Service Provider Plan (“DSP-V”), the Company placed the DSP-V petition, testimony, and exhibits on www.peco.com. In addition, regarding the DSP-V Public Input Hearing (“PIH”), PECO placed information and a link on its home page informing customers how to register to participate in the hearing. PECO also placed information advertising the PIH in local newspapers and on several social media sites (Facebook and Twitter). PECO will continue to use the various communications channels like the web, newspapers, bill inserts and social media to inform customers as additional important proceedings arise.

During radio interviews, Town Hall meetings, and webinars, PECO also advised listeners / customers about hearings on the LIHEAP State Plan for the upcoming LIHEAP season.

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

PECO Response: Not applicable to PECO.