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VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**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 requesting information from utilities regarding their activities to assist customers in response to the Governor’s Proclamation of Disaster Emergency and the Commission’s subsequent Emergency Order at Docket No. M-2020-3019244. Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “Companies”) adopted a number of changes in response to COVID-19 and continue to work with customers regarding payment and assistance options in light of the additional hardships imposed by the pandemic. This letter provides all information requested by the Commission related to the Companies’ actions and identifies additional steps the Companies are taking to assist customers.

Termination of Service

The Companies ceased all disconnection activity for non-payment on March 13, 2020. In addition, the Companies waived reconnection fees and security deposit assessments for customers whose service was disconnected for non-payment prior to March 13, 2020, and who contacted the Companies seeking reconnection. This action was consistent with the Commission’s issuance of an Emergency Order prohibiting the termination of service during the pendency of the Governor’s Proclamation of Disaster Emergency.¹ With the Disaster Emergency being extended to September 2, 2020, the Companies anticipate that, unless the Disaster Emergency is further extended or the Commission directs or orders otherwise, the prohibition of service terminations will expire on September 2, 2020. Consistent with FirstEnergy’s current plans to not commence service

¹ On, March 6, 2020, Governor Wolf issued a Proclamation of Disaster Emergency as a result of the COVID-19 pandemic for a period of 90 days, unless renewed by the Governor. Commonwealth of Pennsylvania, Governor’s Office, *Proclamation of Disaster Emergency* (March 6, 2020). On March 13, 2020, the Commission issued an Emergency Order halting service termination for non-payment during the pendency of the Disaster Emergency. *Public Utility Service Termination Moratorium Proclamation of Disaster Emergency – COVID-19*, Docket No. M-2020-3019244 (Emergency Order dated March 13, 2020). On June 3, 2020, the Governor issued an Amendment to Proclamation of Disaster Emergency, which renewed the Disaster Emergency for another 90 days. Commonwealth of Pennsylvania, Governor’s Office, *Amendment to Proclamation of Disaster Emergency* (June 3, 2020).

disconnections any sooner than September 15, 2020 throughout its electric utilities' service territory footprints across five states, the Companies are currently working towards a date whereby service disconnections for non-payment in Pennsylvania would also occur no sooner than September 15, 2020, with field collection activity leading up to any disconnections resuming no sooner than August 1, 2020. Prior to any disconnections for non-payment, the Companies will comply with all customer notification requirements in Chapter 56 of the Commission's regulations.

Appendix A attached hereto includes a summary of customer accounts that would be eligible for termination of service due to non-payment if disconnection activity were to resume today. This data is broken down by customer class, and further breaks down the residential accounts to specifically identify confirmed low-income accounts who are enrolled in each of the Companies' Pennsylvania Customer Assistance Programs ("PCAP"). Because the impacts of COVID-19 are constantly evolving, the Companies are unable to project with any certainty the number of accounts that would be eligible for termination at a specific date in the future.

Universal Service Programs

The Companies modified certain practices within their assistance programs in response to the challenges imposed by COVID-19. In recognition of the fact that customers may struggle to provide timely or accurate income documentation, the Companies halted the removal of customers from PCAP for failure to recertify their income. When the emergency situation concludes and normal operations resume, PCAP customers will be returned to the recertification process on a staggered basis and receive multiple notifications regarding their new recertification date. In addition, the Companies are permitting customers to enroll in PCAP without providing income documentation or after a customer experiences sudden job loss. Such customers will be asked to recertify their household income in six months.

The Companies also have additional Hardship Fund dollars available to customers. The following eligibility requirements apply: household income at or below 250% of federal poverty income guidelines; payments on the account within the last ninety days of at least \$150 (\$100 for customers over 62); an account balance of at least \$100 (\$0 for customers over 62); and the hardship grant, alone or in combination with other grants or payments, must be enough to bring the account current.

Other Assistance Initiatives

The Companies also adopted procedural changes in an effort to better assist customers during COVID-19. The Companies rolled out an empathy training course for their customer service representatives to allow them to handle calls from customers who are struggling as a result of the pandemic. This empathy training included revised call handling procedures and specific empathy coaching. The Companies also developed an internal small business team, which specializes in advising commercial customers regarding relevant provisions within the CARES Act and their options for payment arrangements.

In addition, the Companies began offering customers one additional payment arrangement in acknowledgement of the unique hardship imposed by COVID-19. For residential customers, the Companies will offer an additional 12-month payment arrangement. For commercial customers, the Companies will offer an additional six-month payment arrangement.

The Companies also seek to implement additional changes to their assistance programs in an effort to help low-income customers; however, those changes will be adopted upon the Commission’s approval of their pending petition to revise their joint universal service and energy conservation program (“USECP”) filed on February 21, 2020 at Docket Nos. M-2017-2636969, M-2017-2636973, M-2017-2636976, and M-2017-2636978 (“Petition”). It has become increasingly evident to the Companies that their proposed changes in the Petition are necessary in order for the Companies to most effectively assist low-income customers during and after this pandemic.

In particular, the Companies’ Petition seeks to implement the following changes, which would complement their response to COVID-19:

- The Companies seek to re-defer the past due balances of active PCAP customer accounts. In order to adopt the changes in the revised USECP, the Companies need to complete an information technology (“IT”) conversion that will result in all past due balances of PCAP customers being deferred for potential arrearage forgiveness. *See* Petition, Exhibit A, p. 4. Under normal circumstances, PCAP customers are only permitted to defer their past due balance for potential arrearage forgiveness at the time of their initial PCAP enrollment. However, this IT conversion presents an important benefit for PCAP customers – particularly in light of COVID-19. Without this re-deferral of customers’ past due balances, PCAP customers may fall behind on their current bills and be at risk for service termination after the Commission’s Emergency Order expires.
- The revised USECP establishes tiered PCAP credit amounts that are based on household energy burden thresholds. *See* Petition, Exhibit A, p. 14. This change in PCAP credit methodology ensures PCAP customers are only paying a certain fixed percentage of their income towards their electricity bill. Due to the significant changes in household income levels as a result of the pandemic, this change adds another element of affordability to PCAP that will help ensure a PCAP customer’s monthly payments are manageable and based on their current income level.
- The Companies are proposing a detailed customer education, outreach, and referral program, which will help raise awareness regarding the assistance programs available to low-income customers. *See* Petition, Exhibit A, pp. 24-25. The Companies already engage in extensive customer education and outreach and are working to continue these efforts during the pandemic; however, the Companies are hoping to roll out this more detailed proposed program upon Commission approval of the revised USECP.
- The proposed USECP promotes more efficiency during the PCAP enrollment process. Specifically, where a customer applies to PCAP and the Companies’ third-party administrator, the Dollar Energy Fund, is able to confirm that the customer received LIHEAP within the last 12 months, the customer would not be required to submit additional income documentation to qualify for PCAP. *See* Petition, Exhibit A, p. 13. The Companies are seeking this additional flexibility to allow low-income customers to obtain as many benefits as possible, particularly in light of COVID-19.

The foregoing changes requested in the Companies' Petition would provide significant additional help to low-income customers who are facing unprecedented affordability challenges as a result of the COVID-19 pandemic. Accordingly, the Companies respectfully request that the Commission expedite their approval of the Companies' Petition and permit the Companies to move forward with these changes to their USECP as soon as possible.

Consumer Education and Outreach

Finally, the Companies launched an extensive education and outreach campaign to alert customers regarding the Companies' response to COVID-19 and the assistance opportunities available to customers. These education and outreach efforts include:

- About 500 social media posts focused on assistance options, energy efficiency, the suspension of service termination due to non-payment, and spam warnings;
- A new website dedicated to information and resources related to the Companies' response to COVID-19 (<https://www.firstenergycorp.com/help/safety/coronavirus.html>);
- An email from FirstEnergy Corp. Chief Executive Officer Chuck Jones to customers regarding their bill assistance options;
- Scripting changes specifically focused on COVID-19 relief;
- Bill inserts and bill messaging related to assistance options for residential customers and the CARES Act for commercial customers;
- Talking points for customer-facing employees on the Companies' COVID-19 response and assistance options for residential and commercial customers;
- An outbound call campaign with assistance information;
- Additional low-income/assistance program customer call campaigns;
- Multiple news releases related to the Companies' response to COVID-19, which focused on the suspension of service termination and additional grant money available to customers through the Companies' Hardship Fund;
- Radio and newspaper ads addressing the suspension of service termination and customer payment and assistance options; and
- Additional education provided by WARM contractors for WARM customers whose usage has increased beyond projected levels.

Should you have any additional questions or concerns, please do not hesitate to contact me.

Very truly yours,



Teresa Harrold

c: Renardo L. Hicks, Chief Counsel (rehicks@pa.gov)
John Herzog, Executive Deputy Chief Counsel (jherzog@pa.gov)
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Accounts eligible for termination - 2019 actuals vs. 2020 estimate

Residential - 2019 (includes Confirmed Low Income)			Residential - 2020 (includes Confirmed Low Income)		
Row Labels	# of Accounts	Disconnection Amount	Row Labels	# of Accounts	Disconnection Amount
ME	46,050	\$21,245,078	ME	42,535	\$25,476,988
PN	47,917	\$23,508,588	PN	43,861	\$27,829,597
PP	10,810	\$5,335,774	PP	10,712	\$7,095,257
WPP	49,482	\$25,461,278	WPP	46,206	\$30,149,774
Grand Total	154,259	\$75,550,718	Grand Total	143,314	\$90,551,616

Residential - 2019 Confirmed Low Income			Residential - 2020 Confirmed Low Income		
Row Labels	# of Accounts	Disconnection Amount	Row Labels	# of Accounts	Disconnection Amount
ME	2,079	\$833,345	ME	1,949	\$855,138
PN	2,125	\$815,260	PN	1,979	\$761,809
PP	456	\$155,429	PP	433	\$195,297
WPP	2,682	\$969,226	WPP	2,309	\$974,267
Grand Total	7,342	\$2,773,261	Grand Total	6,670	\$2,786,511

Non-Residential - 2019			Non-Residential - 2020		
Row Labels	# of Accounts	Disconnection Amount	Row Labels	# of Accounts	Disconnection Amount
ME	3,368	\$2,354,995	ME	3,937	\$2,998,685
PN	4,077	\$3,041,620	PN	4,146	\$3,110,828
PP	939	\$839,108	PP	966	\$743,697
WPP	4,329	\$3,025,991	WPP	4,126	\$2,818,520
Grand Total	12,713	\$9,261,714	Grand Total	13,175	\$9,671,729