

**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 30, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

**Via e-service only**

**Re: PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015 (Docket No. M-2012-2290911); PECO Energy Company Universal Service and Energy Conservation Plan for 2016-2018 (Docket No. M-2015-2507139); PECO Energy Company Universal Service and Energy Conservation Plan for 2019-2024 (Docket No. M-2018-3005795); PECO Energy Company Universal Services Program Six-Year Evaluation Report (M-2019-3011281)**

Dear Secretary Chiavetta:

On June 28, 2019, PECO Energy Company (“PECO”) filed its Universal Service Program Six-Year Evaluation Report containing the results of the expert external evaluation<sup>1</sup> of two full calendar years of operational data regarding the Fixed Credit Option (“FCO”) Customer Assistance Program (“CAP”). The results of that evaluation showed that in the first two operational years of the FCO program (calendar years 2017 and 2018), unaffordability in the 50% of Federal Poverty Level group remained high.

In its June 2019 filing, PECO laid out a series of “next steps” and has been working diligently since then to address the issues revealed in the evaluation report. During that time, the Commission has also issued a series of orders that impact both energy affordability as well as Universal Service Programs, as a whole.<sup>2</sup> As a result, PECO reevaluated the structure and efficacy of the FCO.

---

<sup>1</sup> PECO’s external evaluator is the Applied Public Policy Research Institute for Study and Evaluation, or “APPRISE.”

<sup>2</sup> See, e.g., Docket No. M-2019-2032601 (Order entered October 3, 2019) addressing USECP filing schedules and independent evaluation filing schedules; Docket No. M-2019-3012599 (Order entered November 4, 2019) enacting sweeping changes to the Commission’s CAP Policy Statement; Docket No. L-2019-3012600 (Order entered January 2, 2020) ordering that a comprehensive universal service rulemaking be established no later than the end of 1Q2020.

Rosemary Chiavetta, Secretary  
June 30, 2020  
Page 2

On March 25, 2020, PECO submitted a subsequent letter to the Commission that reaffirmed the Company's commitment to addressing the issues revealed in the FCO evaluation, to working with stakeholders, and to incorporating the guidance the Commission has provided in its subsequent orders. PECO stated that a new filing would be made no later than the end of June 2020.

PECO has been working closely with stakeholders since that time and is nearing completion of its 2019-2024 USECP filing. As it communicated to Commission staff during the briefing on PECO's short-term Low-Income Customer Relief filing and to the stakeholders, PECO expects that the 2019-2024 USECP filing will be made the week of July 6<sup>th</sup>.

PECO notes that, due to the pandemic, all PECO attorneys and key support staff are working remotely. Accordingly, PECO will not have its usual access to photocopying and U.S. mail, among other services. To that end, PECO has requested that hard copy service to the Company be suspended and that only electronic copies be provided. Similarly, PECO has requested that parties waive hard copy service from PECO during this time. This measure will ensure that the important work we all collectively engage in will continue with as little disruption as possible during this crisis. For these reasons, PECO has provided electronic service only to the parties listed on the attached Certificate of Service.

Should you have any questions, please contact me at 215-841-5777.

Sincerely,



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

Cc: Certificate of Service  
Bureau of Consumer Services

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015</b>	<b>:</b>	
	<b>:</b>	
	<b>:</b>	<b>Docket No. M-2012-2290911</b>
	<b>:</b>	
<b>PECO Energy Company Universal Service and Energy Conservation Plan for 2016-2018</b>	<b>:</b>	
	<b>:</b>	<b>Docket No. M-2015-2507139</b>
	<b>:</b>	
	<b>:</b>	
<b>PECO Energy Company Universal Service and Energy Conservation Plan for 2019-2024</b>	<b>:</b>	
	<b>:</b>	<b>Docket No. M-2018-3005795</b>
	<b>:</b>	
	<b>:</b>	
<b>PECO Energy Company Universal Services Program Six-Year Evaluation Report</b>	<b>:</b>	
	<b>:</b>	<b>Docket No. M-2019-3011281</b>
	<b>:</b>	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the Letter Update regarding PECO Energy Company’s Universal Service Program Six-Year Evaluation upon the individuals listed below via email only.\*

Elizabeth Marx, Esq.  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)  
[rpereirapulp@palegalaid.net](mailto:rpereirapulp@palegalaid.net)  
(CAUSE-PA)

Tanya J. McCloskey, Esq.  
Christy Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Forum Place  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)

PA Coalition Against Domestic Violence  
3605 Vartan Way, Suite 101  
Harrisburg, PA 17110  
[dpetyo@pcadv.org](mailto:dpetyo@pcadv.org)

Robert W. Ballenger, Esq.  
Josie B. H. Pickens, Esq.  
Community Legal Services Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[JPickens@clsphila.org](mailto:JPickens@clsphila.org)  
(TURN, Action Alliance)

Anna Brickman, Esq.  
Face to Face  
123 E Price Street  
Philadelphia, PA 19144  
[Anna.Brickman@facetofacegermantown.org](mailto:Anna.Brickman@facetofacegermantown.org)

Daniel Clearfield, Esq.  
Eckert Seamans  
213 Market Street  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

Dated: June 30, 2020



---

Jennedy S. Johnson (PA ID No. 203098)  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Phone: 215-841-4353  
Email: [jennedy.johnson@exeloncorp.com](mailto:jennedy.johnson@exeloncorp.com)

\* As per the directives issued by the Governor and the stay-at-home order issued by Philadelphia's Mayor, all PECO attorneys and key support staff will be working remotely until these restrictions are lifted. Accordingly, PECO legal will not have its usual access to photocopying and U.S. mail, among other services. PECO has made this filing electronically and served parties via email.

5247158