



COMMONWEALTH OF PENNSYLVANIA

July 28, 2020

**E-FILED**

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

**Re: PECO Energy Company's 2019-2024 Universal Service And Energy Conservation Plan / Docket Nos. P-2020-3020727 & M-2018-3005795**

Dear Secretary Chiavetta:

Enclosed please find the Answer, Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Sharon E. Webb

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

*Enclosures*

cc: Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PECO Energy Company’s 2019-2024** :  
**Universal Service And Energy** : **Docket Nos. M-2018-3005795**  
**Conservation Plan** : **P-2020-3020727**  
:

**ANSWER OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE TO  
PETITION OF PECO ENERGY COMPANY**

**I. INTRODUCTION**

On July 8, 2020, PECO Energy Company (“PECO” or the “Company”) submitted to the Pennsylvania Public Utility Commission (“PUC” or the “Commission”) an Amended Proposed 2019-2024 Universal Service and Energy Conservation Plan (“*Amended Proposed USECP*”) in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599.

In its *Amended Proposed USECP*, the Company proposed to implement a percent of income payment plan (“PIPP”) and to discontinue budget billing for CAP customers. *Amended Proposed USECP*, at p. 10. PECO proposed to implement the PIPP within 8 months after Commission approval. *Amended Proposed USECP*, at p. 10. Additionally, the Company proposed to eliminate late payment charges for CAP customers. *Amended Proposed USECP*, at p. 11. PECO also proposed to modify recertification timelines by adding a 6-month recertification requirement for customers reporting no household income and by extending the recertification timeframe for customers who received a LIHEAP grant from 3 to 4 years. *Amended Proposed USECP*, at p. 10.

## II. ANSWER

The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission. The Office of Small Business Advocate (“OSBA”) respectfully submits that the Company has not presented sufficient justification for its proposals in the *Amended Proposed USECP* and the OSBA, as well as other stakeholders, must have the opportunity to investigate and further analyze the justness and reasonableness of the claims and proposals PECO made in the *Amended Proposed USECP*. As such, the OSBA submits that the Commission should provide the stakeholders with the opportunity to conduct a full investigation of PECO’s *Amended Proposed USECP* to ensure the public interest is protected.

III. CONCLUSION

In view of the foregoing, the Office of Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. provide stakeholders, including the OSBA, with an opportunity to evaluate and investigate the *Amended Proposed USECP*; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Sharon E. Webb

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Sharon E. Webb  
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Assistant Small Business Advocate

For:

John R. Evans  
Small Business Advocate

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Harrisburg, PA 17101  
(717) 783-2525  
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Dated: July 28, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PECO Energy Company’s 2019-2024</b>	<b>:</b>	
<b>Universal Service And Energy</b>	<b>:</b>	<b>Docket Nos. M-2018-3005795</b>
<b>Conservation Plan</b>	<b>:</b>	<b>P-2020-3020727</b>
	<b>:</b>	

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Amended Proposed 2019-2024 Universal Service and Energy Conservation Plan (“*Amended Proposed USECP*”) that was filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on July 8, 2020 by PECO Energy Company (“PECO” or the “Company”) in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599. In support of this Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interest of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by PECO are adequately represented.

3. Representing the OSBA in this proceeding is:

Sharon E. Webb  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
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Respectfully submitted,

/s/ Sharon E. Webb

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Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

Dated: July 28, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PECO Energy Company's 2019-2024</b>	:	
<b>Universal Service And Energy</b>	:	<b>Docket Nos. M-2018-3005795</b>
<b>Conservation Plan</b>	:	<b>P-2020-3020727</b>
	:	

**PUBLIC STATEMENT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 ("Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission ("PUC" or the "Commission") or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an intervention regarding the Amended Proposed 2019-2024 Universal Service and Energy Conservation Plan ("*Amended Proposed USECP*") filed by PECO Energy Company ("PECO" or the "Company") in response to the Commission's revised Customer Assistance Program ("CAP") Policy Statement issued at Docket No. M-2019-3012599.

The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by PECO are adequately represented.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the *Amended Proposed USECP*.

Dated: July 28, 2020

**VERIFICATION**

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 07/28/20

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PECO Energy Company's 2019-2024</b>	:	
<b>Universal Service And Energy</b>	:	<b>Docket Nos. M-2018-3005795</b>
<b>Conservation Plan</b>	:	<b>P-2020-3020727</b>
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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DATE: July 28, 2020

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/s/ Sharon E. Webb

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