

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 7, 2021

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 No. M-2018-3005795

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Bureau of Technical Utility Services (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Certificate of Service

*308301

CERTIFICATE OF SERVICE

Re: PECO Energy Company's 2019-2024 :
Universal Service and Energy : Docket No. M-2018-3005795
Conservation Plan :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of May 2021.

SERVICE BY E-MAIL ONLY

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Dated: May 7, 2021
*308302

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PECO Energy Company's 2019-2024 :
Universal Service and : Docket No. M-2018-3005795
Energy Conservation Plan :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

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Phillip D. Demanchick
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Darryl A. Lawrence
Senior Assistant Consumer Advocate
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Respectfully Submitted,

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DATED: May 7, 2021
*308288

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention and to participate in proceedings before the Commission involving PECO Energy Company's Universal Service and Energy Conservation Plan at Docket No. M-2018-3005795.

On November, 1, 2018, PECO filed its Universal Service and Energy Conservation Plan (USECP). On July 8, 2020, PECO submitted its Amended Proposed USECP to its existing USECP, docketed at P-2020-3020727. PECO also extended the proposed USECP through 2024. Through its July 8th Amended USECP, PECO is seeking to make several significant changes to its universal service program, including transitioning from its currently approved Fixed Credit Option (FCO) payment plan to a Percent of Income Payment Plan (PIPP) incorporating certain energy burdens outlined in the Commission's Final Policy Statement and Order. In addition to these changes, PECO is seeking, among other things, to eliminate the assessment of late payment charges for CAP customers, utilize the Commission's standardized zero-income form, update its recertification requirements to better align with the Final CAP Policy Statement and Order at Docket No. M-2019-3012601, and expand its customer outreach and education program. July 8th Amended Proposed USECP, Filing Letter at 2.

The Company's July 8th Amended Plan did not propose to change the energy burdens for customers between 101-150% of the Federal Poverty Level, but on September 25, 2020, PECO filed its Petition to Amend its USECP to include energy burden reductions for customers at 101-

150% of the FPL. In its September 25th Amended Plan, PECO proposes the following energy burdens:

FPL	Electric Non-Heating	Electric Heating	Gas
0 to 50%	2%	6%	4%
51 to 100%	4%	10%	6%
101 to 150%	4%	10%	10%

September 25th Petition to Amend at ¶ 26. PECO anticipated in the July 8th Amended Plan the proposed changes for customers from 0-100% of the FPL will increase annual costs for its universal services programs by approximately \$21.3 million for 2022, \$22.7 million for 2023, and \$23.0 million for 2024. July 8th Amended Proposed USECP, Redline Attachment at 27. PECO did not provide projections for 2021 in its July 8th Amended Proposed USECP. *Id.* In its September 25th Amended Plan, PECO projected that an increase of the CAP shortfall from November 2020 through April 2021 would be an incremental cost of \$12,967,610. September 25th Petition to Amend at ¶ 27, Red-line Attachment at Addendum H.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in the PECO’s service territory. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.