

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 18, 2022

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

Re: PPL Electric Utilities Corporation's
Proposed Universal Service and Energy
Conservation Plan for 2023-2027
Docket No. M-2022-3031727

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
PA Attorney I.D. # 85824
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Enclosures:

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

*328875

CERTIFICATE OF SERVICE

Re: PPL Electric Utilities Corporation's Proposed :
Universal Service and Energy Conservation : Docket No. M-2022-3031727
Plan for 2023-2027 :

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 18th day of May 2022.

SERVICE BY E-MAIL ONLY

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/s/ Christy M. Appleby
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: May 18, 2022
*328876

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: PPL Electric Utilities Corporation's Proposed :
Universal Service and Energy Conservation : Docket No. M-2022-3031727
Plan for 2023-2027 :

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:

Darryl A. Lawrence
Senior Assistant Consumer Advocate
Christy M. Appleby
Assistant Consumer Advocate
Office of Consumer Advocate
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Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAappleby@paoca.org

DATED: May 18, 2022
*328877

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 the Universal Service and Energy Conservation Plan for PPL Electric Utilities Corporation (PPL).

On April 1, 2022, PPL filed its proposed Universal Service and Energy Conservation Plan for 2023-2027 (USECP). PPL proposes the following modifications: (1) change from an 18-month program to a 12-month program design; (2) change the primary payment option from Percent of Bill to Percent of Income plan and the applicable energy burdens to the energy burdens identified in the Commission's CAP Policy Statement; (3) increase the minimum payment for non-heating customers from \$12.00 to \$20.00 and for heating customers from \$30.00-\$40.00; (4) eliminate the \$5 arrearage co-payment; (5) include payment reviews to confirm the customer does not have a payment amount that is greater than the average bill; (6) exclude Time of Use and shopping customers from eligibility; (7) require recertification every 6 months for zero income customers; (8) allow automatic recertification for customers who have received LIHEAP in the past 12 months or receive Supplemental Security Income (SSI) as the primary source of income; (9) revise maximum CAP credit amounts; (10) eliminate default from the program after 2 missed payments and instead place in Active Collections; and (11) update fraud protocols. USECP at 17-19.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in PPL's service territory. The OCA seeks to ensure that the universal service programs are appropriately funded, operated in a cost-effective manner, and reasonably designed to reduce energy consumption and assist low-income customers to afford energy service. 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.