

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 11, 2022

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

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

Dear Secretary Chiavetta:

On July 1, 2022, PECO Energy Company (PECO or Company) filed its Petition for Rehearing, Or, In The Alternative, Rescission And Amendment Of The Commission's Order Entered June 16, 2022 (Petition). In its Petition, PECO requests rehearing, or in the alternative, rescission of the Commission's Order in order to extend the timelines for implementation of elements of the Commission's Order. For the reasons set forth below, the Office of Consumer Advocate (OCA) respectfully requests that PECO's Petition for rehearing be denied and that the requested extension until December 16, 2022 be granted.

In its June 16, 2022 Order, the Commission approved several modifications to PECO's Customer Assistance Program (CAP). In the Order, the Commission directed that PECO's proposed CAP design be changed from the existing Fixed Credit Option (FCO) design to a Percentage of Income Payment Program (PIPP) design. In its Petition, PECO requested a limited extension of the timeline for an additional two months from October 16, 2022 until December 16, 2022 in order to complete the transition from its existing FCO design to a PIPP design. Petition at ¶¶ 20-21.

The Commission also directed PECO to ensure that a CAP customer's final bill does not exceed the customer's pro-rated CAP price based on the days of service and to reflect this change in the revised Universal Service and Energy Conservation Plan (USECP). As PECO noted, the Order, however, does not provide a specific timeline for implementation of the change. See Petition at ¶¶ 26-27. In its Petition, PECO provided that additional time was needed to implement the changes and requested an extension until December 16, 2022 to implement the change.

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Petition at ¶¶ 29-30. PECO requested a clarification to the Order to allow the Company until December 16, 2022 to implement the changes. Petition at ¶ 31.

Finally, the Commission provided that PECO must “1) commence charging income-qualified customers the CAP price for months spent out of the program following reenrollment; and 2) allow such customers to receive PPA forgiveness for payment of these months if they reenroll in CAP within 12 months after removal. (Order, pp. 65, 106).” Petition at ¶ 34. PECO stated that the Company will need additional time to implement a manual process by the Company’s billing departments and that it is not feasible to implement a systematic mechanism to implement the Commission’s directives in the timeline. Petition at ¶ 35. The Company determined that a manual process can be developed and tested in sufficient time that it can be implemented concurrently with the PIPP design change, or by December 16, 2022. Petition at ¶¶ 36-37. The Company also requests a limited extension to implement the reenrollment requirements by no later than December 16, 2022. Petition at ¶ 37.

PECO requests that Commission should grant rehearing of the Order or, in the alternative, rescission and amendment of the Order in order to approve PECO’s request for a limited extension until December 16, 2022. The OCA does not object to the extensions to the timeline presented in the Company’s Petition until December 16, 2022. The OCA, however, does not agree that a rehearing is necessary. A rehearing in this matter would only further unnecessarily delay implementation of the Commission’s Order in this matter and is not necessary to implement the limited extension that will address PECO’s requests. The OCA respectfully requests that PECO’s Petition for rehearing be denied and that the request extension until December 16, 2022 be granted.

Respectfully submitted,

/s/ Christy M. Appleby

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Assistant Consumer Advocate

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Certificate of Service

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CERTIFICATE OF SERVICE

Re: PECO Energy Company Universal Service	:	
and Energy Conservation Plan for 2019-2024	:	Docket No. M-2018-3005795
Submitted in Compliance with 52 Pa. Code §	:	
§ 54.74 and 62.4.	:	
	:	
Petition of PECO Energy Company to amend	:	
its Amended Proposed 2019-2024 Universal	:	Docket No. P-2020-3020727
Service and Energy Conservation Plan – filed	:	
July 8, 2020	:	
	:	
Petition of PECO Energy Company to amend	:	
its Amended Proposed 2019-2024 Universal	:	Docket No. P-2020-3022154
Service and Energy Conservation Plan – filed	:	
September 25, 2020	:	

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter Re: In Lieu of Answer, 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 11<sup>th</sup> day of July 2022.

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