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**E-File**

August 3, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17120-3265

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

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Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric" or "the Company") is PPL Electric's response to the Commission's July 14, 2022 Order Directing Supplemental Information and Establishing Comment Period in the above-captioned proceeding.

In addition to the supplemental information, attached please find a redline copy of the Proposed Universal Service and Energy Conservation Plan for 2023-2027, reflecting changes suggested in several of the Company's responses.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on August 3, 2022, which is the date it was filed electronically using the Commission's E-filing system.

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael J. Shafer". The signature is fluid and cursive, with a prominent initial "M".

Michael J. Shafer

Enclosure  
cc via email: Nathan Froehlich  
Certificate of Service

Christina Chase-Pettis  
Louise Fink Smith

## CERTIFICATE OF SERVICE

(Docket No. M-2022-3031727)

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

### VIA ELECTRONIC MAIL

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Date: August 3, 2022



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Michael J. Shafer

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-1. Provide an explanation of how the proposed PIP energy burdens were determined. PPL shall also provide an analysis of projected average monthly PIP bills and the projected annual PIP credit expenditures from 2023-2027 based on charging the recommended maximum CAP Policy Statement (2020) energy burdens, broken down by FPIG tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%) and energy type (*i.e.*, ENH and EH).

A. PA PUC 1-1. PPL Electric determined its PIP energy burden with customer success in mind. The Company completed an analysis to determine the best fit for customers to afford their PIP OnTrack installments while not exceeding the maximum guidelines defined in the CAP policy statement.

See Attachment PA PUC 1-1.

# Response Q. PUC 1-1



# Change to percent of income



Line 10, shows the savings PPL’s program would realize if implementing the recommended maximum PIP levels in the CAP Policy Statement.

Line 11, shows the increase to program costs for PPL’s recommended PIP levels.

	2023	2024	2025	2026	2027	
6						
7	OnTrack Revenue Credits	\$ 61,000,000	\$ 61,358,824	\$ 61,717,647	\$ 62,076,471	\$ 62,435,294
8	OnTrack Arrearage Forgiveness	21,000,000	21,123,529	21,247,059	21,370,588	21,494,118
9	OnTrack Expense/Admin/External	3,000,000	3,017,647	3,035,294	3,052,941	3,070,588
10	Cost of Change to Income %	(12,950,074)	(14,587,090)	(15,812,873)	(17,128,113)	(18,539,915)
11	Right Size Percent Income	6,101,225	6,869,980	7,419,578	8,354,445	9,407,105
12	Cost of Increase to Maximum Credit	3,179,724	3,720,278	4,129,508	4,583,754	5,087,967
13	12 Month Arrearage Charge	5,230,231	6,171,672	7,159,140	8,304,602	9,467,246
14	Additional Admin Charges	1,031,472	1,117,429	1,150,951	1,196,989	1,232,899
15	Increase Minimum Payments	(1,059,356)	(1,038,169)	(986,261)	(1,055,299)	(1,118,617)
16						
17	Total OnTrack USR Recovery	\$ 86,533,222	\$ 87,754,099	\$ 89,060,043	\$ 90,756,377	\$ 92,536,684
18						
19	Original OnTrack Costs	\$ 85,000,000	\$ 85,500,000	\$ 86,000,000	\$ 86,500,000	\$ 87,000,000
20						
21	Projected Savings	\$ (1,533,222.06)	\$(2,254,098.90)	\$ (3,060,042.52)	\$(4,256,377.47)	\$ (5,536,684.15)

*The Company defines “Right Size Percent Income” is defined as 95% customer success rate in the program.*

# PUC participant cost by month



The chart below shows the average monthly change in participants’ payment amount if the suggested percentages of income were to be used. Negative amounts (in parentheses) signify a reduction in the amount a participant would pay, and positive numbers would be an increase.

Poverty Level	Heat Type	2023	2024	2025	2026	2027
50% or Below	Electric Heat	\$ (24.17)	\$ (24.90)	\$ (24.40)	\$ (24.15)	\$ (25.36)
	Nonelectric Heat	\$ (18.77)	\$ (19.33)	\$ (18.95)	\$ (18.76)	\$ (19.69)
51 to 100%	Electric Heat	\$ (5.01)	\$ (5.16)	\$ (5.06)	\$ (5.01)	\$ (5.26)
	Nonelectric Heat	\$ (2.88)	\$ (2.97)	\$ (2.91)	\$ (2.88)	\$ (3.02)
101 to 150%	Electric Heat	\$ 32.54	\$ 33.52	\$ 32.85	\$ 32.52	\$ 34.14
	Nonelectric Heat	\$ 22.50	\$ 23.18	\$ 22.71	\$ 22.48	\$ 23.61

	Electric Heat	Non-Electric Heat
50% Or Below	6%	2%
50 to 100%	10%	4%
100 to 150%	10%	4%



# PPL right sized participant cost by month

The chart below shows the average monthly change in participants’ payment amount if the lower percentages of income suggested by PPL were to be used. Negative amounts (in parentheses) signify a reduction in the amount a participant would pay, and positive numbers would be an increase.

Poverty Level	Heat Type	2023	2024	2025	2026	2027
50% or Below	Electric Heat	\$ (25.11)	\$ (25.86)	\$ (25.35)	\$ (25.09)	\$ (26.35)
	Nonelectric Heat	\$ (18.77)	\$ (19.33)	\$ (18.95)	\$ (18.76)	\$ (19.69)
51 to 100%	Electric Heat	\$ (6.78)	\$ (6.98)	\$ (6.84)	\$ (6.78)	\$ (7.11)
	Nonelectric Heat	\$ (3.17)	\$ (3.27)	\$ (3.20)	\$ (3.17)	\$ (3.33)
101 to 150%	Electric Heat	\$ 22.45	\$ 23.12	\$ 22.66	\$ 22.43	\$ 23.56
	Nonelectric Heat	\$ 22.50	\$ 23.18	\$ 22.71	\$ 22.48	\$ 23.61

	Electric Heat	Non Electric Heat
50% Or Below	5%	2%
50 to 100%	6%	3.5%
100 to 150%	7%	4%

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-2. Provide an explanation of how the ASP calculated payment may differ from the customer's average bill. PPL is directed to include any instructions given to OnTrack agencies on how to determine an ASP amount based on specific household or financial situations.

A. PA PUC 1-2. The ASP will always provide an installment less than the average bill. Primarily, the ASP will be used if the PIP is greater than the average bill. The agency is given discretion in setting the ASP amount to provide the customer with an affordable bill while also taking into account the maximum credit limit. With the proposed change, the OnTrack caseworkers will be making the determination of using the ASP compared to the average bill and the PIP installment. The Company will provide the new instructions for the process with the implementation of the proposed changes.

**PPL Electric Utilities Corporation  
 Response to Supplemental Information Request of the  
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 July 14, 2022  
Docket No. M-2022-3031727**

Q. Provide projected average monthly OnTrack bills from 2023-2027, broken down by FPIG tier, energy type, and payment option (*i.e.*, PIP/POB, ASP, Minimum Payment) based on both PA PUC 1-3. PPL’s existing and proposed OnTrack Payment calculations.

A. PA PUC 1-3.

	2023		2024		2025		2026		2027	
	Existing Percent of Bill Payment	Proposed Percent of Income Payment	Existing Percent of Bill Payment	Proposed Percent of Income Payment	Existing Percent of Bill Payment	Proposed Percent of Income Payment	Existing Percent of Bill Payment	Proposed Percent of Income Payment	Existing Percent of Bill Payment	Proposed Percent of Income Payment
<b>50% or Below Poverty</b>										
Elec. Heat	\$ 73.87	\$ 43.16	\$ 70.39	\$ 43.68	\$ 67.17	\$ 44.18	\$ 65.50	\$ 44.12	\$ 69.10	\$ 44.93
Non-Elec. Heat	\$ 42.65	\$ 20.63	\$ 39.37	\$ 20.69	\$ 37.18	\$ 20.75	\$ 35.63	\$ 20.83	\$ 37.64	\$ 20.99
<b>51% to 100% Poverty</b>										
Elec. Heat	\$ 99.12	\$ 70.70	\$ 100.88	\$ 74.63	\$ 98.97	\$ 75.30	\$ 97.42	\$ 76.23	\$ 99.99	\$ 76.70
Non-Elec. Heat	\$ 64.59	\$ 42.56	\$ 64.71	\$ 44.90	\$ 64.64	\$ 45.64	\$ 62.81	\$ 45.80	\$ 65.87	\$ 46.33
<b>101% to 150% Poverty</b>										
Elec. Heat	\$ 118.67	\$ 131.00	\$ 124.19	\$ 140.54	\$ 121.96	\$ 142.99	\$ 121.53	\$ 145.71	\$ 123.46	\$ 144.76
Non-Elec. Heat	\$ 85.84	\$ 77.06	\$ 87.87	\$ 82.32	\$ 88.95	\$ 83.68	\$ 87.69	\$ 83.90	\$ 90.82	\$ 84.33

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**Response to Supplemental Information Request of the**  
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**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-4. Provide projected cost impact of the proposed OnTrack payment changes. PPL shall provide an estimate of how the energy burden change may impact OnTrack expenditures in 2023-2027. The cost projections must be broken down by cost component (*i.e.*, administration, OnTrack credits, and PPA forgiveness), FPIG tier, energy type, and payment option.

A. PA PUC 1-4. Below are PPL Electric’s projected costs for years 2023 through 2027. Rows in yellow are projected costs without any changes to the OnTrack program. Rows in orange are the costs for changes to the program. Line 21 is the overall projected savings in cost recovery to the program.

	2023	2024	2025	2026	2027	
6						
7	OnTrack Revenue Credits	\$ 61,000,000	\$ 61,358,824	\$ 61,717,647	\$ 62,076,471	\$ 62,435,294
8	OnTrack Arrearage Forgiveness	21,000,000	21,123,529	21,247,059	21,370,588	21,494,118
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10	Cost of Change to Income %	(12,950,074)	(14,587,090)	(15,812,873)	(17,128,113)	(18,539,915)
11	Right Size Percent Income	6,101,225	6,869,980	7,419,578	8,354,445	9,407,105
12	Cost of Increase to Maximum Credit	3,179,724	3,720,278	4,129,508	4,583,754	5,087,967
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15	Increase Minimum Payments	(1,059,356)	(1,038,169)	(986,261)	(1,055,299)	(1,118,617)
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17	Total OnTrack USR Recovery	\$ 86,533,222	\$ 87,754,099	\$ 89,060,043	\$ 90,756,377	\$ 92,536,684
18						
19	Original OnTrack Costs	\$ 85,000,000	\$ 85,500,000	\$ 86,000,000	\$ 86,500,000	\$ 87,000,000
20						
21	Projected Savings	\$ (1,533,222.06)	\$(2,254,098.90)	\$( 3,060,042.52)	\$(4,256,377.47)	\$( 5,536,684.15)

*The Company defines “Right Size Percent Income” as 95% customer success rate in the program.*

**Change to energy burden levels:**

Line 10 shows the savings the OnTrack program would realize by implementing the recommended maximum energy burden levels in the CAP Policy Statement.

Line 11 shows the increase to program costs for PPL Electric's recommended PIP levels as described in the proposed 2023-2027 USECP.

PPL Electric determined its PIP energy burden with customer success in mind. The Company completed an analysis to determine the best fit for customers to afford their PIP OnTrack installments while not exceeding the maximum guidelines defined in the CAP policy statement.

**Change to maximum credits**

Line 12 shows the increase to program costs due to PPL Electric's suggested new maximum credits.

To find the correct levels for the maximum credit, the Company used linear regression to find amounts that at least 95% of previous accounts that had exceeded the maximum credit over the past 6 years would not have exceeded.

**Change to 12-month program**

Line 13 shows the increase to program costs from the Company decreasing the months for arrearage forgiveness from 18 to 12 months.

Using the past 6 years of data, PPL Electric determined how much more would have been forgiven each month if the amounts were one twelfth of the total pre-program arrearage and not one eighteenth. Added into these costs is the estimated higher success rate for accounts staying in the plan due to a shorter plan length.

**Impact on Administrative Costs**

Line 14 shows the increase to administration costs from the Company decreasing the plan length from 18 to 12 months. This estimate factors in an increase in costs for more frequent recertifications.

**Change to minimum payment and elimination of arrearage  
co-pay**

Line 15 shows the savings for increasing the minimum payment amount as well as dropping the charge for arrearage forgiveness.

Using linear regression and the past 6 years of data, PPL Electric factored in the participants payment amounts if the minimum payment had been increased and the arrearage forgiveness charge had been removed.

WITNESS: Yvette Belfort

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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Q. PA PUC 1-5. Provide projected annual increase to OnTrack costs from 2023-2027 based on the elimination of the \$5 PPA co-payment.

A. PA PUC 1-5. See PPL Electric Response 1-4.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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Q. PA PUC 1-6. Provide projected impact on annual collection costs, as defined in 52 Pa. § 54.75(1)(ii), from 2023-2027 based on implementation of the proposed OnTrack payment changes, broken down by FPIG tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%).

A. PA PUC 1-6. The Company tracks historic collection costs to include in its Universal Service Report to the Commission. The Company does not have projections on what its collection costs will be for 2023-2027.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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Q. PA PUC 1-7. Provide projected impact on unused LIHEAP grants returned to the Department of Human Services (DHS). PPL is directed to provide an analysis for each FPIG tier (0%-50%, 51%-100%, and 101%-150%) and energy type to determine the number and amounts of unused LIHEAP grants for OnTrack customers returned to DHS because funds were not exhausted within the specified two-year period. PPL must provide actual data for 2020 and 2021 and projected data for 2023 through 2027 based on the proposed changes to OnTrack bills.

A. PA PUC 1-7.

		Customer Count	Dollars Refunded
2020	50% or Below Poverty	141	\$ 47,549.85
	51% to 100% Poverty	18	\$ 3,617.20
	101% to 150% Poverty	6	\$ 793.87
	<b>Grand Total</b>	<b>184</b>	<b>\$ 55,467.89</b>
2021	50% or Below Poverty	240	\$ 84,285.64
	51% to 100% Poverty	21	\$ 5,236.36
	101% to 150% Poverty	6	\$ 1,049.23
	<b>Grand Total</b>	<b>288</b>	<b>\$ 96,833.95</b>

The Company projects less than 1% of LIHEAP dollars received are refunded. Of the dollars refunded 90% are associated with OnTrack customers. Because of the varied program parameters and grant amounts, the Company is unable to project LIHEAP dollars it anticipates receiving and/or returning between 2023 to 2027.

**PPL Electric Utilities Corporation**  
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Q. PA PUC 1-8. Explain whether the CAP Plus charge may result in an OnTrack bill that is greater than the customer's PIP energy burden or average bill amount, whichever is less.

A. PA PUC 1-8. No, the inclusion of CAP Plus will not make a customer's OnTrack bill greater than the customer's PIP energy burden or average bill amount. The customer's Total Energy Burden Payment Amount ("TEBPA") is calculated first and the CAP Plus charge is subtracted from the TEBPA to arrive at the OnTrack Installment Amount. The process ensures that the customer's total bill will never exceed the recommended energy burden amount.

For additional details, please see the response to PA PUC 1-11.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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**July 14, 2022**  
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Q. PA PUC 1-9. Explain how the OnTrack installment amount is calculated.

A. PA PUC 1-9. The "Total Energy Burden Payment Amount" ("TEBPA") is calculated by using the Percent of Income ("PIP") method. This calculation multiplies the customer's monthly income by the percentage in the chart below to get their TEBPA. As explained in the response to PA PUC 1-11, the current CAP Plus amount would then be subtracted from the TEBPA to determine the customer's OnTrack Installment Amount. Customers who have remaining LIHEAP credits would only pay their OnTrack Installment Amount. Otherwise, customers will pay their OnTrack Installment Amount and the CAP Plus amount. For example, a customer's income is below 50% of the FPIG and their monthly income is \$850 for a 3-person household with electric heat. Their TEBPA would be \$42.50. PPL Electric's current CAP Plus amount is \$7.00, so the OnTrack Installment Amount would be \$35.50.

Income Level (Percent of FPIG)	Electric Heat	Non-Electric Heat
50% or Below	5%	2%
51 to 100%	6%	3.5%
101 to 150%	7%	4%

**PPL Electric Utilities Corporation**  
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**July 14, 2022**  
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Q. PA PUC 1-10. Explain how the annual change to the CAP Plus charge is communicated to customers and stakeholders.

A. PA PUC 1-10. The CAP Plus amount is updated annually. A letter is sent to the customer informing them of the new charge. The letter is sent out the month prior to the CAP Plus amount change. The CAP Plus amount is also included as a line item on their monthly bill. In addition, PPL Electric notifies its community partners who administer the OnTrack program as well as the customer service representatives who handle OnTrack customer inquiries.

**PPL Electric Utilities Corporation**  
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- Q. PA PUC 1-11. Explain how the monthly OnTrack payment amount can remain unchanged if the CAP Plus charge is not included in the bill. PPL shall provide an example of how an OnTrack household will be billed with a CAP Plus charge and how that same household will be billed if the CAP Plus charge is not included. PPL shall provide copies of sample bills showing both scenarios.
- A. PA PUC 1-11. PPL Electric designed the Total Energy Burden Payment Amount (“TEBPA”) to allow for the inclusion of applicable CAP Plus charges while ensuring that at no time would a customer’s total bill exceed the recommended energy burden limits contained in the Commission’s CAP Policy Statement. This is accomplished by calculating the customer’s TEBPA first, and then subtracting any applicable CAP Plus amounts to arrive at the OnTrack Installment Amount. This method allows for the OnTrack Installment Amount to adjust automatically as the CAP Plus amount changes or is eliminated for customers who have remaining LIHEAP credits. For example, if a CAP customer’s TEBPA were \$50, the customer’s OnTrack bill would be \$50 even if they had LIHEAP credits remaining. Once the customer’s LIHEAP credits were exhausted, the CAP Plus amount simply would be included in that \$50, the OnTrack Installment Amount would be adjusted downward by the CAP Plus amount, and the total charge would still equal the TEBPA of \$50. In other words, if the CAP Plus amount were \$5, and there were no LIHEAP credits remaining, the CAP customer’s OnTrack Installment Amount would be changed from \$50 to \$45 to reflect the addition of the \$5 CAP Plus amount, resulting in the same \$50 OnTrack bill. Regardless of whether the customer has any LIHEAP credits remaining, the OnTrack bill would never be more than the customer’s TEBPA.

PPL Electric maintains that this proposed method is consistent with Section 601.45 of the Fiscal Year 2022 LIHEAP State Plan and 52 Pa. Code § 56.15(12). Moreover, customers who pay CAP Plus would have a separate line item on their bill indicating the CAP Plus amount in addition to the OnTrack Installment Amount. Example bills of each scenario are attached hereto as Attachment 1-11 (with CAP Plus language) and Attachment 1-11-1 (without CAP Plus language)

Notwithstanding, if the Commission and other interested stakeholders prefer, the Company would be willing to change its proposed method. Specifically, when there are LIHEAP credits remaining for a CAP customer, PPL Electric could make the customer's OnTrack Installment Amount equal to the TEBPA minus the CAP Plus amount. In the example provided above, the OnTrack bill would be \$45 if LIHEAP credits remained and \$50 once the LIHEAP credits were exhausted. The CAP Plus amount would only appear as a separate line item on the OnTrack bills for customers with no LIHEAP credit balances.



We deliver.

1-800-342-5775  
For hours of operation and to  
pay/manage your account, visit  
ppl electric.com.

Meter [REDACTED] Account [REDACTED]

Due Date	Amount Due
<b>7/18/22</b>	<b>\$52.00</b>

[Billing Details on Back](#)

Because you are in OnTrack, your amount due does not equal your Usage Charges.

Service to:  
[REDACTED]

Supply	\$31.54	Usage from May 25 - Jun 24	\$26.36	Delivery
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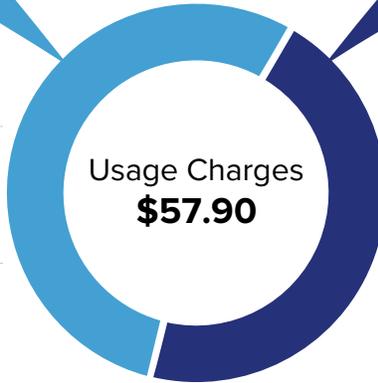
PPL Electric Utilities  
1-800-342-5775

Effective Date  
2/18/22

PPL Electric Utilities

**PPL Electric Utilities Price to Compare**  
\$0.12366 Use this price when comparing  
supplier offers.

Account Number: [REDACTED]  
The price to compare is updated June 1<sup>st</sup> and December 1<sup>st</sup>.  
Rate: RS. View schedule at [ppl electric.com/rates](#)



**OnTrack Plan Summary**

OnTrack Monthly Payment	\$52.00
<b>OnTrack Amount Due</b>	<b>\$52.00</b>

Includes \$7.00 to offset cost of the program.

OnTrack makes your bill more affordable. Compare the difference between your actual bill and your OnTrack bill.

**Actual Bill \$57.90 Ontrack Bill \$52.00**

\$5 of your OnTrack payment is applied to your program balance.

**Usage Summary**



For usage and billing details, visit us online at [ppl electric.com](#)

**June**

Electricity Usage (kWh) Avg. Temperature Avg. Daily Cost

270	71°	\$1.93
2022	2022	2022

**Questions/concerns?** Contact us by 7/18/22

Sign back of bill stub to enroll in auto bill pay.

1-800-342-5775  
Visit [ppl electric.com](#) for hours of operation.

Correspondence to:  
PPL Customer Service  
827 Hausman Road  
Allentown, PA 18104-9392



Account Number	Due Date	Amount Due
[REDACTED]	<b>7/18/22</b>	<b>\$52.00</b>

Amount Enclosed:

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Please make check payable to: PPL ELECTRIC UTILITIES  
PO BOX 419054  
ST LOUIS, MO 63141-9054

[REDACTED]



We deliver.

1-800-342-5775  
For hours of operation and to  
pay/manage your account, visit  
ppl electric.com.

Meter [REDACTED] Account [REDACTED]

Due Date	Amount Due
	<b>NONE</b>

\$199.00 LIHEAP credits remaining after this bill.

Service to:



<b>Supply</b>	<b>\$40.56</b>	Usage from Jun 3 - Jul 5	<b>\$28.63</b>	<b>Delivery</b>
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PPL Electric Utilities  
1-800-342-5775

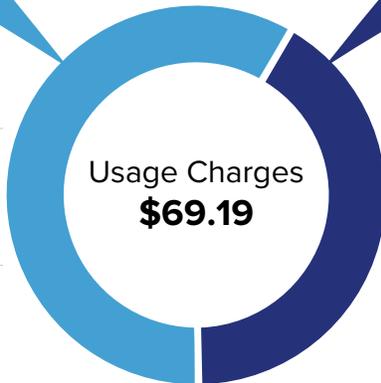
Effective Date  
11/16/21

PPL Electric Utilities

**PPL Electric Utilities Price to Compare**

\$0.12366

Use this price when comparing  
supplier offers.



**OnTrack Plan Summary**

OnTrack Monthly Payment \$74.00

LIHEAP Credit -\$74.00

**OnTrack Amount Due \$0.00**

You're right OnTrack with your payments.  
Thank you!

Account Number: [REDACTED]

The price to compare is updated June 1<sup>st</sup> and December 1<sup>st</sup>.  
Rate: RS. View schedule at [ppl electric.com/rates](http://ppl electric.com/rates)

**Usage Summary**



For usage and billing details, visit us online at [ppl electric.com](http://ppl electric.com)

**July**

Electricity Usage (kWh) Avg. Temperature Avg. Daily Cost



**Questions/concerns?** Contact us by 7/27/22

1-800-342-5775

Visit [ppl electric.com](http://ppl electric.com) for hours of operation.



Correspondence to:  
PPL Customer Service  
827 Hausman Road  
Allentown, PA 18104-9392

Account Number	Due Date	Amount Due
[REDACTED]		<b>NONE</b>



PPL ELECTRIC UTILITIES  
2 NORTH 9TH STREET CPC-GENN1  
ALLENTOWN, PA 18101-1175

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-12. Explain how the annual OnTrack costs would increase annually from 2023 through 2027 if the CAP Plus charge were eliminated.

A. PA PUC 1-12. The CAP Plus amount is calculated using the total LIHEAP dollars received for OnTrack customers. Because of the varied program parameters and grant amounts, the Company is unable to project LIHEAP dollars it anticipates receiving for OnTrack customers between 2023 to 2027. Generally speaking, however, program costs would increase by the total amount of LIHEAP dollars the Company receives for its OnTrack customers.

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Q. PA PUC 1-13. Provide an explanation of how often OnTrack bills are reviewed and whether its alert system will identify whether customers paying either the PIP or ASP amounts may need their bills adjusted, as well as how this determination is made. PPL is also directed to provide an explanation of the specific situations when an OnTrack bill will be adjusted.

A. PA PUC 1-13. The Company has a monthly report to alert to any Active OnTrack participant with an OnTrack installment amount greater than the average bill. The alert includes customers with either the PIP or ASP option.

The Regulatory Program Specialist(s) reviews the individual accounts to determine whether an adjustment to the installment amount is needed. The primary factor reviewed is usage history.

If there is adequate usage history for the customer, and the average bill has declined since the initial enrollment date (either due to a decrease in usage, price, or both), the Company will reduce the installment amount so that the customer receives the appropriate discount according to their household income.

If there is not adequate usage history for the customer, but historical usage at the property suggests that future use over the remainder of the enrollment period will cause the installment to fall below the average, the installment may not be adjusted at the time of review.

If the installment continues to remain above the average bill as the customer builds usage history, the installment may be adjusted at a future review point.

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Q. PA PUC 1-14. Explain PPL's implementation timeframe for its proposed 12-month program cycle and when new and existing OnTrack customers would be transitioned to it.

A. PA PUC 1-14. PPL Electric plans on having a tiered approach to transferring customers from an 18-month cycle to a 12-month cycle. The current plan for this transition is detailed below. However, this process will require IT work, and there may be minor modifications to these plans depending on IT capability to successfully make this change. If the Company does change this plan, PPL Electric will update the Commission and Stakeholders.

When transferring accounts from an 18-month cycle to a 12-month cycle, existing OnTrack customers will be placed into two specific categories:

- Less than 11 months in the program; and
- Between 11 and 18 months in the program.

Below is the strategy for each of those categories of customers:

- Less than 11 months in the program
  - o The current agreement timeline will change from 18 months to 12 months.
  - o A letter will be sent to these customers with the explanation that their timeline will be adjusted from 18 to 12 months. The letter will also indicate the customer has the option to reapply early providing updated household and income information or they can wait until recertification time.
- Between 11 and 18 months in the program

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- o The existing OnTrack payment agreement will be updated with the following:
  - Change the cycle from 18 months to 12 months.
  - Create new agreement with approved program parameters.
- o A letter will be sent explaining that their OnTrack agreement will be updated based on income and include a 12-month timeline. It will inform the customer of the option to provide updated income information so the installment depicts their current income situation on the new agreement cycle.

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Q. PA PUC 1-15. Provide the number of customers claiming zero income, from 2019 through 2021, whose accounts were placed into collection or termination status or whose service was terminated within 30 days of submitting a paper OnTrack application. This information must be broken down by year and the type of collection activity taken (e.g., termination notice, service shut-off).

A. PA PUC 1-15.

<b>Year</b>	<b>Total # of Accounts</b>	<b>10-Day Notice</b>	<b>3-day Notice</b>	<b>Service Termination within 30 days of application</b>
2019	1386	371	218	85
2020	860	63	2	0
2021	1264	292	152	57
<b>Grand Total</b>	<b>3510</b>	<b>726</b>	<b>372</b>	<b>142</b>

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Q. PA PUC 1-16. Confirm whether all customers are given the option of providing 30 days or 12 months of income, whichever is more representative of household income, through the OnTrack application process. If not, PPL is directed to identify the income documentation timeframes requested from all OnTrack applicants. Additionally, PPL is directed to provide a definition and examples of what it considers “seasonal workers.” PPL is also directed to include copies of its OnTrack application, recertification letters, brochures, and any other distributed written communications describing OnTrack income eligibility requirements or income documentation timeframes.

A. PA PUC 1-16. The Company has included in the proposed USECP 2023-2027 the option for all customers to provide income for 30 days or 12 months, whichever is most beneficial to the customer.

Some examples of what PPL Electric considers seasonal workers are: school employees, landscapers, or those working in snow removal.

PPL Electric will update its application and recertification letters based on the change of allowing all customers to provide proof of income for 30 days or 12 months. These documents have not yet been prepared, but the Company will share copies when available.

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- Q. PA PUC 1-17. Provide information showing the impact that excluding unearned income for minors would have on OnTrack eligibility and costs. Specifically, PPL is directed to identify the following statistics for 2019, 2020, and 2021:
- Number of OnTrack customers receiving unearned income for minor children;
  - Number of customers determined income-eligible for OnTrack who reported unearned income for minor children; and
  - Amount of additional OnTrack credit expenditures if unearned income for minors had been excluded from participating household income.
- A. PA PUC 1-17. The Company does not separately track and is unable to extract income reported for individual household members.

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Q. PA PUC 1-18. Provide the projected additional annual enrollment and costs to OnTrack – including administration, arrearage forgiveness, and CAP credits – associated with excluding unearned income for minors from 2023 through 2027.

A. PA PUC 1-18. The Company does not separately track and is unable to extract income reported for individual household members.

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Q. PA PUC 1-19. Clarify the provision in the Proposed 2023-2027 USECP that states that “[a] loss from one source of income cannot be used to offset another source of income.”

A. PA PUC 1-19. PPL Electric intended this provision to mean that operating losses from self-employment or losses associated with rental properties cannot be used to offset other forms of income. This provision has been clarified and a redline of the plan page has been attached to this filing.

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Q. PA PUC 1-20. Provide information regarding how the proposed maximum allowable OnTrack credits for a 12-month program cycle were determined.

A. PA PUC 1-20. PPL Electric used linear regression to find the maximum allowable OnTrack credits that 95% of previously unsuccessful accounts, using the last 6 years of data, would not have surpassed the max credit amount. Amounts were rounded up to the nearest \$50 mark.

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Q. PA PUC 1-21. Provide the following information for customers enrolled in OnTrack Budget Billing (OTBB) during 2019, 2020 and 2021:

- Total and average in-program arrears accrued by customer in OTBB;
- Average total bill amount and percent bill increase for customers transitioned to OTBB;
- Number of OTBB customers who were sent termination notices; and
- Number of OTBB customers whose service was terminated.

A. PA PUC 1-21.

	<b>Total OTBB In-program Arrearage</b>	<b>Avg OTBB In-program Arrearage</b>
2019	\$ 1,035,930.53	\$ 153.38
2020	\$ 2,462,056.85	\$ 414.42
2021	\$ 1,311,313.08	\$ 215.32
<b>Grand Total</b>	<b>\$ 4,809,300.46</b>	<b>\$ 256.02</b>

	<b>Avg OTBB Installment</b>	<b>Avg % Increase</b>
2019	\$ 215.08	333.6%
2020	\$ 220.64	383.9%
2021	\$ 216.13	359.6%
<b>Grand Total</b>	<b>\$ 217.18</b>	<b>358.2%</b>

	<b>Had Notice Sent</b>	<b>% Notice</b>	<b>Terminated</b>	<b>% Terminated</b>
2019	3,295	48.8%	859	12.7%
2020	955	16.1%	59	1.0%
2021	732	12.0%	119	2.0%
<b>Grand Total</b>	<b>4,982</b>	<b>26.5%</b>	<b>1,037</b>	<b>5.5%</b>

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Q. PA PUC 1-22. Explain whether PPL Electric continues to send letters informing OnTrack customers when they reach 50% and 80% of their maximum OnTrack credit limits. If so, PPL shall provide copies of those letters and the OTBB activation letter. PPL is also directed to explain whether OnTrack customers may seek exemptions to their credit limits, what exemptions are given, and how those exemptions are communicated to the customer.

A. PA PUC 1-22. Yes, the Company continues to send the referenced letters. Copies of the letters are attached as Attachment PA PUC 1-22, Attachment PA PUC 1-22-1, and Attachment PA PUC 1-22-2.

PPL Electric does grant exceptions to the maximum OnTrack credit limits, when warranted. The Company has existing practices in place that allow for customers to request exceptions from the maximum credit limit. Customers can request an exception by calling the contact center, by filing a dispute with the Company or with the Public Utility Commission, or by working through Community Partners or Consumer Advocates. When PPL Electric staff are made aware of a request for exception, the Regulatory Programs Specialist completes a review and if appropriate, the customer will be provided with a new OnTrack agreement to allow for a reset of these benefits. Typically, the customer is advised of the outcome of the request by a community partner agency.

PPL Electric wants to limit the use of maximum credit exceptions because it believes that the maximum OnTrack credits are at the appropriate levels for its program participants. Customers in OnTrack who have high usage are automatically referred to PPL's WRAP program and are encouraged to participate. Exceptions may be considered for one or more of the reasons outlined in Section 69.265(3)(vi) of the Commission's regulations. See 52 Pa. Code § 69.265(3)(vi).

**Re: Notification of Benefit Limits**

Dear Customer:

You're approaching 50% of your OnTrack program credit limit with PPL Electric Utilities. We wanted to let you know that you're halfway to the limit so that you can take steps now to conserve electricity.

Our goal is to provide you with a lower fixed monthly payment amount and eliminate any debt you may owe us. Each month, PPL Electric Utilities pays the difference between your actual monthly bill and your OnTrack payment amount. Based on your income and heating source, the maximum amount that PPL will pay toward your bills is [REDACTED] over 18 months.

If you exceed the maximum credit, your OnTrack payment amount will increase to the current budget billing amount. Budget billing is based on your average actual electric bill instead of your reduced OnTrack bill. We want you to be able to extend this credit as long as possible.

If you haven't already done so, sign up today for the WRAP program at [ppllectric.com/WRAP](http://ppllectric.com/WRAP) or by calling 1-888-232-6302. This program makes energy efficiency improvements to your home or apartment, helping you save electricity. Try simple ways to conserve electricity: shut off the lights when you leave the room, unplug electronics when they're not in use, and adjust your thermostat if your health permits.

Thank you again for participating in the OnTrack program. We'll notify you again if you reach 80% of the maximum credit.

Sincerely,

**PPL Electric Utilities**

**Re: Second Notification of Benefit Limits**

Dear Customer:

You're now at 80% of your OnTrack program credit limit with PPL Electric Utilities. We wanted to let you know that you're almost at the limit so that you can take steps to remain in the program for as long as possible by conserving electricity now.

As you may know, each month PPL Electric Utilities pays the difference between your actual monthly bill and your OnTrack payment amount. Based on your income and heating source, the maximum amount that PPL will pay toward your bills is [REDACTED] over 18 months.

If you exceed the maximum credit, your OnTrack payment amount will increase to the current budget billing amount. Budget billing is based on your average actual electric bill instead of your reduced OnTrack bill. We want you to be able to extend this credit as long as possible.

If you haven't already done so, sign up today for the WRAP program at [ppllectric.com/WRAP](http://ppllectric.com/WRAP) or by calling 1-888-232-6302. This program makes energy efficiency improvements to your home or apartment, helping you save electricity. Try simple ways to conserve electricity: shut off the lights when you leave the room, unplug electronics when they're not in use, and adjust your thermostat if your health permits.

Thank you again for participating in the OnTrack program. We will notify you if you reach 100% of the maximum credit.

Sincerely,

**PPL Electric Utilities**

**PPL Electric Utilities**  
827 Hausman Road Allentown, PA 18104-9392  
Tel.800.342.5775 (800.DIAL.PPL) Fax 484.634.3484  
pplelectric.com



OT BUDGET BILL ACTIVATE  
1188 OTBBACTIVATE  
[REDACTED] [REDACTED]

October 15, 2015

Dear OT BUDGET BILL ACTIVATE,

You were enrolled in our OnTrack program on [REDACTED] and your fixed monthly payment amount was set at \$ [REDACTED]. Unfortunately, on [REDACTED] you exceeded your maximum OnTrack credit amount.

The good news is you can remain in the OnTrack program. As long as you pay your bills on time, we will continue to eliminate any overdue balance you may have so that you still benefit from debt forgiveness.

However, we are adjusting your monthly payment amount to your average bill amount, which is currently \$ [REDACTED]. This will be your new OnTrack payment amount for the rest of your time in the program. It is important to always pay the "Amount Due" shown on your bill.

We will send you another letter and program application 18 months from your enrollment date. It will be mailed to you in a gold-colored envelope. At that time, you will be eligible to re-enroll in OnTrack at a lower payment amount. Be sure to look for that letter and program application.

Sincerely,

**PPL Electric Utilities**

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
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Q. PA PUC 1-23. Explain how the proposed OnTrack minimum payment amounts were determined for each energy type (*i.e.*, ENH, EH) and how many OnTrack customers will see an increase to their monthly bills as a result of this change and the average amount of this increase. Additionally, PPL is directed to provide the annual projected cost difference between maintaining the current minimum payment amounts and the proposed minimum payment amounts from 2023 through 2027.

A. PA PUC 1-23. The Company considered the following when deciding to propose an increase to the minimum payments:

- The CAP policy statement allowed the minimum amounts to be reviewed and adjusted in its USECP proceeding.
- PPL Electric's minimum payments amounts have remained unchanged for years despite cost to provide electric service.
- There are other proposed program benefits that will offset this increase. For example, if approved, the OnTrack customer will receive arrearage forgiveness in 12 months and increased maximum bill credits while paying a lower installment.
- The change also serves to balance the costs borne by the Company's ratepayers.

With respect to how many OnTrack customers will see an increase to their monthly bills as a result of this change and the average amount of this increase, the Company can make the following projections:

- Currently, there are 3,270 customers with an electric heat minimum payment and 2,189 customers with a non-electric heat minimum payment. Considering current

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enrollment levels, 5,459 customers could potentially see this increase in the minimum payment. The monthly increase for electric heat customers would be approximately \$10 and for non-electric heat would be approximately \$8.

See PPL Electric's Response to 1-4 for the projected cost difference.

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Q. PA PUC 1-24. Clarify whether PPL Electric allows OnTrack customers to receive PPA forgiveness for each on-time and in-full monthly payment, regardless of OnTrack arrears, and retroactive PPA forgiveness for any months missed once the customer pays the OnTrack balance in full.

A. PA PUC 1-24. Yes, the customer will receive PPA forgiveness for each on-time and in-full monthly payment.

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Q. Identify the projected annual cost of providing PPA forgiveness over 36 PA PUC months, 24 months, 18 months, and 12 months from 2023 to 2027, and 1-25. explain why the chosen program cycle is proposed.

A. The Company selected a 12-month program cycle based on analysis of PA PUC overall participant success. Additionally, this was a recommendation 1-25. received in its six-year USCEP evaluation.

	2023		2024		2025		2026		2027	
18 Month Baseline	\$	21,000,000	\$	21,123,529	\$	21,247,059	\$	21,370,588	\$	21,494,118
12 Month Forgiveness Delta	\$	4,630,231	\$	5,185,858	\$	5,756,303	\$	6,389,496	\$	7,092,340
12 Month Total	\$	25,630,231	\$	26,309,388	\$	27,003,361	\$	27,760,084	\$	28,586,458
24 Month Forgiveness Delta	\$	(11,112,506)	\$	(12,446,006)	\$	(13,815,067)	\$	(15,334,724)	\$	(17,021,544)
24 Month Total	\$	9,887,494	\$	8,677,523	\$	7,431,992	\$	6,035,864	\$	4,472,574
36 Month Forgiveness Delta	\$	(14,353,657)	\$	(14,640,730)	\$	(15,079,952)	\$	(15,833,950)	\$	(17,259,005)
36 Month Total	\$	6,646,343	\$	6,482,799	\$	6,167,107	\$	5,536,638	\$	4,235,112

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Q. PA PUC 1-26. Clarify whether OnTrack customers are exempt from late fees.

A. PA PUC 1-26. Yes, OnTrack customers are exempt from late fees.

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Q. PA PUC 1-27. Describe PPL Electric's policy and procedures regarding waiving or refunding security deposits for OnTrack-eligible customers.

A. PA PUC 1-27. When a customer is made eligible for OnTrack and they have an active security deposit on the account, PPL Electric's system will do one of the following:

- If the deposit has been quoted, but not billed, the security deposit will be waived automatically.
- If the deposit has been billed and not paid, the security deposit will be credited back to the account automatically.
- If the deposit has been paid, either partially or in full, the security deposit will be refunded back to the account along with interest.

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Q. PA PUC 1-28. Explain PPL Electric's reasoning for re-proposing this stay-out provision for customers who voluntarily leave On-Track. If the reasons are similar to those raised in the 2017 USECP proceeding, PPL is directed to provide supporting data showing how customers are benefiting when they voluntarily leave OnTrack. If PPL has new reasons, PPL is directed to provide supporting data for those reasons.

A. PA PUC 1-28. The Company is proposing to require a customer to remain out of the program until the end of their initial 12-month enrollment period if they request removal when they are in: (1) an OTBB status; or (2) OnTrack Collections. However, customers in OnTrack Collections at the time of requested removal may return to OnTrack prior to 12 months by paying all missed OnTrack installments.

PPL Electric does not keep statistics around these requests. However, the Company is concerned that allowing customers to re-enroll in the program prior to the 12-month program period expiring will effectively eliminate the maximum credit provision of the USECP. This has the potential to dramatically increase OnTrack program costs. It will also act as a disincentive for OnTrack customers to manage their own electric usage, which is one of the goals of the program.

The following example illustrates the Company's concern. A customer enrolls in January, transitions to OTBB in October, and requests removal from the program in November. The customer is advised they can reapply for the program in January. Without the option of requiring the customer to remain out of the program until their timeline has expired, there will be customers who exceed the maximum cap credits in a 12-month period due to multiple enrollments.

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- Q. PA PUC 1-29. Describe PPL Electric's current OnTrack final billing policy and explain whether this policy has changed since the Commission's CAP Final Billing proceeding. PPL is also directed to address how its final OnTrack billing practices reflect compliance with the relevant statutes and regulations as discussed in the CAP Final Billing Order.
- A. PA PUC 1-29. When an OnTrack customer requests a discontinuance of service, a final bill is issued. The final bill is issued for the actual usage from the last meter reading to the date of discontinuance, in addition to all unpaid charges on the account. The actual usage is billed at the residential rate. The Company treats the request to discontinue service as the customer voluntarily leaving OnTrack. Therefore, at that time, the only "rate applicable to service rendered to" that "patron" under Section 1303 of the Public Utility Code is the full residential rate. 66 Pa. C.S. § 1303. As such, PPL Electric issues a final bill based on the full residential rate rather than the OnTrack amount. Furthermore, participation in OnTrack is entirely voluntarily, and customers remain in their designated residential rate schedule under PPL Electric's tariff even when they enroll in OnTrack. Thus, PPL Electric maintains that its practice complies with the relevant statutes and regulations referenced in the CAP Final Billing Order.

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Q. PA PUC 1-30. Provide the following information:

- The annual number of customers removed from OnTrack in 2018 and 2019 for failure to recertify and how many of these customers re-enrolled within six months after program removal;
- The annual number and percentage of OnTrack recertifications in 2018 and 2019 resulting in a customer being removed from the program for being income-ineligible; and
- The projected impact of the proposed OnTrack recertification timeframes on annual program removals from 2023 through 2027.

A. PA PUC 1-30. PPL Electric provides the following responses to the Commission's clarification requests:

The annual number of customers removed from Ontrack in 2018 and 2019 for failure to recertify and how many of these customers re-enrolled within six months after program removal are as follows:

<b>Year</b>	<b>Number of Customers Removed for Failure to Recertify</b>	<b>Re-enrolled within 6 Months of Program Removal</b>
2018	6,341	2,859
2019	8,935	4,077
<b>Grand Total</b>	<b>15,276</b>	<b>6,936</b>

The Company does not separately track the annual number and percentage of OnTrack recertifications in 2018 and 2019 resulting in a customer being removed from the program for being income-ineligible.

However, the annual number of OnTrack recertifications in 2018 was 6,172 and in 2019 was 10,762.

The projected impact of the proposed OnTrack recertification timeframes on annual program removals from 2023 through 2027 are as follows:

The data reflects 45% of customers who initially failed to recertify had a subsequent OnTrack agreement. For the recertifications that later were declared income ineligible, that is most likely due to employment changes. The Company does not anticipate any material change to customer recertification outcomes because of the proposed plan changes.

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Q. PA PUC 1-31. Explain what documentation or information would be sufficient to allow a customer to recertify in OnTrack Lifestyle (OTLS) beyond 12 months.

A. PA PUC 1-31. PPL Electric's goal in requesting the additional documentation is to understand how the customer is able to sustain their living arrangements without reporting income for 12 consecutive months. Examples of documentation allowing customers to recertify in OTLS beyond 12 months are bank statements, current lease, and/or support letters from other sources of income. The Company is not looking to remove the customer from the program, but rather confirm their eligibility and participation at the most appropriate level.

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Q. Provide the total number and percentage of OnTrack customers enrolled in (OnTrack Lifestyle) OTLS annually from 2018 through 2021. This information shall be broken down between OTLS participants enrolled with zero income and OTLS participants with income less than their rent/mortgage. PPL should also identify how many of these customers were later enrolled in regular OnTrack, remained in OTLS for more than one nine-month cycle, had service terminated, or were subsequently determined income-ineligible.

A.  
PA PUC  
1-32.

<b>Customers Enrolled in OnTrack Lifestyle</b>						
<b>Year</b>	<b>Total OTLS Customers</b>	<b>Zero Income</b>	<b>Later Enrolled in 18-Month OnTrack Program</b>	<b>Remained in OTLS for More Than One 9-Month Cycle</b>	<b>Service Termination</b>	<b>Determined Income Ineligible</b>
2018	4,886	2,437	2,150	1,972	458	1,877
2019	6,792	4,353	2,502	3,119	530	2,354
2020	6,498	3,892	2,068	4,098	14	2,064
2021	7,543	5,179	321	1,579	157	1,133
<b>Grand Total</b>	<b>25,719</b>	<b>15,861</b>	<b>7,041</b>	<b>10,768</b>	<b>1,159</b>	<b>7,428</b>

Customers Enrolled in OnTrack Lifestyle with Zero Income					
Year	Total OTLS Zero Income	Later Enrolled in 18-Month OnTrack Program	Remained in OTLS for More Than One 9-Month Cycle	Service Termination	Determined Income Ineligible
2018	2,437	1,026	1,061	211	866
2019	4,353	1,551	2,000	306	1,480
2020	3,892	1,221	2,567	6	1,273
2021	5,179	187	1,012	124	736
<b>Grand Total</b>	<b>15,861</b>	<b>3,985</b>	<b>6,640</b>	<b>647</b>	<b>4,355</b>

Customers Enrolled in OnTrack Lifestyle with Income Less Than Rent/Mortgage					
Year	Total OTLS Income Less Than Shelter	Later Enrolled in 18-Month OnTrack Program	Remained in OTLS for More Than One 9-Month Cycle	Service Termination	Determined Income Ineligible
2018	2,449	1,124	911	247	1,011
2019	2,439	951	1,119	224	874
2020	2,606	847	1,531	8	791
2021	2,364	134	567	33	397
<b>Grand Total</b>	<b>9,858</b>	<b>3,056</b>	<b>4,128</b>	<b>512</b>	<b>3,073</b>

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-33. Provide additional information regarding the fraud investigation process including:

- If there is a timeline given for the customer to dispute the public utility or credit report findings;
- When PPL will take adverse action such as removal from OnTrack should the customer fail to respond or PPL determines the response insufficient;
- If or how the customer may appeal a finding of fraud by PPL;
- The number of fraud investigations conducted annually from 2018 through 2021; and
- The number of instances of fraud discovered annually from 2018 through 2021.

A. PA PUC 1-33.

- PPL Electric will give the customer 20 days to refute the findings. As part of that process, the customer can provide the appropriate documentation to refute those findings. If documentation is not received or is deemed insufficient, the customer will be removed from OnTrack.
- See answer to the first bullet.
- If the customer opts to appeal a finding of fraud by PPL Electric, the customer will be directed to follow traditional dispute procedures. As explained on page 15 of PPL Electric's USECP for 2023-2027, "PPL Electric will follow its normal practices for investigation of fraud, theft of service, and other misappropriations of service which may result in some or all the following: back billing, removal from OnTrack and termination of service."

Under the Commission's regulations, grounds for immediate termination of service include: (1) "[u]nauthorized use of the service delivered on or about the affected dwelling"; (2) "[f]raud or other material misrepresentation of the customer's identify for the purpose of obtaining service"; and (3) "[t]ampering with meters or other public utility equipment." When terminating service for these grounds, PPL Electric follows Section 56.98(b) of the Commission's regulations and "make[s] a good faith attempt to provide a post-termination notice to the customer or a responsible adult person or occupant at the affected premises." The post-termination notice directs the customer to contact the Company's customer service department if they dispute the termination. PPL Electric will follow the same process here when it removes an account from OnTrack due to fraud. In PPL Electric's current USECP, there is not an approved fraud procedure, so the number of fraud investigations have not been tracked. Going forward, these investigations will be tracked and monitored.

- In PPL Electric's current USECP, there is not an approved fraud procedure, so the number of instances of fraud discovered have not been tracked.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-34. Provide a proposed CEOP identifying all ongoing and all planned universal service outreach and education initiatives. The CEOP must also:

- Indicate which education and outreach initiatives are new (*i.e.*, established in 2019 or later) and which initiatives represent existing, ongoing practices to help the most vulnerable customers;
- Provide examples of consumer education letters, postcards, bill inserts, educational brochures, and outbound call messaging scripts; and
- Identify what languages PPL provides for program applications, brochures, and consumer education materials.

Also explain how PPL Electric determines what languages are needed for its service territories.

A. PA PUC 1-34. PPL Electric will attach the following Consumer Education and Outreach Plan (“CEOP”) to its proposed 2023-2027 USECP:

PPL Electric uses a comprehensive approach to its Consumer Education and Outreach Plan (“CEOP”), which educates customers on available programs through a variety of channels and methods. The Company’s goal is to connect customers with the programs that will benefit them the most. Marketing and communication efforts are intended to increase eligible customer enrollments and the quantity of grant dollars received from government and PPL Electric programs, and to expand awareness of available assistance.

The following outlines the plan to continue existing initiatives and incorporate new communication and marketing efforts in the future CEOP.

**Existing CEOP:** PPL Electric will continue marketing and communication initiatives that have proven successful in reaching its goals, including targeted outreach to customers via print communications, email, website marketing, text, phone and social media.

**Newly implemented CEOP:** PPL Electric will continue initiatives that were implemented since the last USECP last filing, including frequent targeted outreach to customers eligible for LIHEAP via email, text message, and printed applications, while increasing the frequency of targeted communications for all program promotions. The Company plans to increase awareness, by holding recurring program education sessions with customer facing employees to maintain and grow program participation.

**Future CEOP:** PPL Electric will incorporate new communication methods to expand program enrollment and awareness through increased use of short videos to explain program benefits and text messages to promote program applications.

Here are communication tactics to be used in the future. Specific frequency, targeting and message will be adapted to the current environment and program needs.

<b>Communication</b>	<b>Audience</b>	<b>Frequency</b>
Organic bill help social media posts	All followers	Weekly
Article in print or digital newsletter	All residential customers	Monthly
OnTrack enrollment emails with a link to an explainer video	Customers recently enrolled in our OnTrack program	Monthly
LIHEAP emails	All eligible customers	Bimonthly, during season
LIHEAP UFT emails and text messages	Customers who received a cash grant and are eligible for a crisis grant	Weekly or Biweekly, during season
OnTrack recertification blaster calls	Customers eligible to recertify	Biweekly

Targeted program emails (all programs or one-specific)	Eligible customers	Bimonthly
Bill help content on homepage of ppelectric.com	All web visitors	Bimonthly
OnTrack emails	Customers who received LIHEAP and are automatically eligible for OnTrack	Biannually
LIURP/WRAP emails	Customers participating in other low-income programs, including LIHEAP, that meet eligibility criteria	Biannually
Bill help/general program emails	All residential customers	Biannually
Bill help/general program news release, media pitch	Media and stakeholders	As needed, at least annually
Paid social media advertising	All followers	As needed, at least annually
WRAP postcards, mailed by contractors	Customers who were approved for WRAP, but have not yet scheduled their energy assessment	As needed
WRAP booklet provided by contractors	Customers who have completed their energy assessment	As needed
LIURP/WRAP Mass Media Marketing	Segments within service area identified low in leads	As needed
LIURP/WRAP informational videos	Customers interested or enrolled in WRAP	Ongoing (once developed)

Attached as Attachments PA PUC 1-34 through 1-34-13 are various consumer education examples.

WITNESS: Yvette Belfort

The Company provides information to customers in Spanish, such as the website, program application and selected outreach material. The Company also has a language line that allows customers calling PPL Electric directly to speak with a Customer Service Representative in their preferred language via a translation service. The Company determines the language offerings based on the needs of its service territory. Specifically, Spanish is identified as the predominant language used for the Company's customer service call translations.



PPL Electric Utilities

## Estamos aquí para ayudar.

Si necesita ayuda con su factura de electricidad, es posible que cumpla con los requisitos para recibir alivio a través del programa OnTrack de PPL.

**NO NECESITA UNA  
CUENTA ATRASADA  
PARA RECIBIR AYUDA.**

*Puede aplicar a OnTrack antes de que esté atrasado.*

**Complete una simple solicitud  
y vea si califica para estos  
beneficios excelentes:**

**PAGOS MENSUALES MÁS BAJOS  
PERDONAR EL PAGO DE SU DEUDA  
AHORRO DE ENERGÍA**

***OnTrack*** →

Más de 65,000 de nuestros clientes están inscritos en OnTrack, y también queremos ayudarlo a usted!



# Solicitar OnTrack es fácil.

## ¡ELIJA LA OPCIÓN QUE MÁS SE LE FACILITE!

- **Aplique por Internet en [ppelectric.com/ontrack](http://ppelectric.com/ontrack)**
  - Cargue archivos o fotografías de sus documentos para agilizar el proceso.
- **Aplique por teléfono llamando al 1-800-342-5775**
- **Envíe su solicitud por correo con la documentación requerida**

## ESTO ES LO QUE NECESITA PARA COMENZAR:

- **Su número de cuenta de PPL**
- **Nombres y edades de todas las personas que viven en su hogar**
- **Prueba de ingresos de 30 días para cada residente**
  - Algunos ejemplos incluyen talonarios de pago, seguro social, beneficios por desempleo, pagos de manutención y estados de cuenta de pensión.

**OnTrack** →

**NO ESPERE MÁS;  
¡SOLICITE ONTRACK  
Y COMIENCE A AHORRAR!**

# YOU MAY BE ELIGIBLE FOR UP TO **\$1,800**



**It's been a  
tough year, but we're  
here to help.**

LIHEAP, the federally funded Low-Income Home Energy Assistance Program, is accepting applications for cash and crisis grants through April 9, 2021. Whether you rent or own your home, you may be eligible for free money toward your electric bill.





# APPLYING FOR LIHEAP IS AS EASY AS 1-2-3

- 1** Collect the following information for each resident in your home:
  - Name
  - Date of birth
  - Social security number
  - Proof of income
- 2** Gather your PPL account number.
- 3** Visit [ppl electric.com/liheap](https://ppl electric.com/liheap) or call the LIHEAP hotline at 1-866-857-7095 to apply.

Each year there are LIHEAP dollars left unclaimed. We want every eligible family to get the support they need this season.

## DON'T HESITATE - APPLY TODAY



PPL Electric Utilities

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## Apply for lower monthly payments and debt forgiveness

We're happy to see you received a grant from the Low-Income Home Energy Assistance Program (LIHEAP) this season. Based on the household income you reported to LIHEAP, you may be eligible for our OnTrack program. OnTrack offers fixed monthly payments, debt forgiveness and referrals to energy saving programs.

It's easy to apply on our [website](#). Here's what you need to get started:

- Your PPL bill account number
- The names and ages of each resident in your home
- 30-day income information for each resident- Paystubs, social security, unemployment benefits, child support payments and pension statements are just a few examples.

And if you're not eligible for OnTrack, don't worry- we'll review your application and match you with the program that will benefit your family most.

[Apply for OnTrack](#)

Connect with us



[Forward this email to a friend](#)

**Please do not reply to this automated email. This mailbox is not monitored**

[Update your email address](#) or [unsubscribe](#) from these messages. This does not change the email address for your PPL Electric Utilities online account.

%%member\_busname%% | %%member\_addr%% | %%member\_city%%, %%member\_state%% |  
%%member\_postalcode%%



PPL Electric Utilities

## We're here to help.

If you need help with your electric bill, you may qualify for some relief through PPL's OnTrack program.

**NO OVERDUE BALANCE?  
NO PROBLEM.**

*You can apply for OnTrack  
before you're past due.*

**Fill out a simple application  
and see if you're eligible  
for these great benefits:**

**LOWER MONTHLY PAYMENTS  
DEBT FORGIVENESS  
ENERGY SAVINGS**

***OnTrack*** →

We have over 65,000  
customers enrolled in OnTrack  
and we want to help you too!



# Applying for OnTrack is easy.

## CHOOSE THE OPTION THAT WORKS BEST FOR YOU!

- **Apply online at [ppllectric.com/ontrack](https://ppllectric.com/ontrack)**
  - Upload files or photos of your paperwork for quick processing
- **Apply over the phone by calling 1-800-342-5775**
- **Submit a paper application with your required documents**

## HERE'S WHAT YOU NEED TO GET STARTED:

- **Your PPL bill account number**
- **Names and ages of everyone who lives in your home**
- **30-day proof of income for each resident**
  - Paystubs, social security, unemployment benefits, child support payments and pension statements are just a few examples.



**DON'T WAIT ANOTHER DAY -  
APPLY FOR ONTRACK  
AND START SAVING!**

# WRAP your home in energy savings



**PPL Electric Utilities**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

*You're one step away from a free energy assessment and energy efficient upgrades.*



**For more info about WRAP, visit [ppllectric.com/wrap](http://ppllectric.com/wrap) or scan here:**



PPL Electric Utilities Corporation  
Docket No. M-2022-3031727  
Attachment PA PUC 1-34-4



**PPL Electric Utilities**

**Don't wait to start saving.**

**Call us to schedule your WRAP energy assessment today.**

**CEO • 570-331-4709**

**[Kingston@ceopeoplehelpingpeople.org](mailto:Kingston@ceopeoplehelpingpeople.org)**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

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**For more info about WRAP,  
visit [ppl electric.com/wrap](http://ppl electric.com/wrap)  
or scan here:**



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Attachment PA PUC 1-34-4



**PPL Electric Utilities**

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WRAP energy assessment today.**

**CLEARResult • 855-570-4712  
[poconowweatherization@cleareresult.com](mailto:poconowweatherization@cleareresult.com)**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

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**For more info about WRAP, visit [ppllectric.com/wrap](http://ppllectric.com/wrap) or scan here:**



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Attachment PA PUC 1-34-4



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**Call us to schedule your  
WRAP energy assessment today.**

**Custom Weatherization, LLC • 610-861-5290  
[info@TruEnergySaver.com](mailto:info@TruEnergySaver.com)**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

*You're one step away from a free energy assessment and energy efficient upgrades.*



**For more info about WRAP, visit [ppllectric.com/wrap](http://ppllectric.com/wrap) or scan here:**



PPL Electric Utilities Corporation  
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Attachment PA PUC 1-34-4



**PPL Electric Utilities**

**Don't wait to start saving.**

**Call us to schedule your WRAP energy assessment today.**

**Green Kite, Inc • 717-230-1616**  
[cases@greenkite.co](mailto:cases@greenkite.co)

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

*You're one step away from a free energy assessment and energy efficient upgrades.*



**For more info about WRAP, visit [ppllectric.com/wrap](http://ppllectric.com/wrap) or scan here:**



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**PPL Electric Utilities**

**Don't wait to start saving.**

**Call us to schedule your  
WRAP energy assessment today.**

**Mt Weatherization • 717-525-9665  
[Info@TennyGroup.com](mailto:Info@TennyGroup.com)**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

*You're one step away from a free energy assessment and energy efficient upgrades.*



**For more info about WRAP, visit [ppl electric.com/wrap](http://ppl electric.com/wrap) or scan here:**



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Attachment PA PUC 1-34-4



**PPL Electric Utilities**

**Don't wait to start saving.**

**Call us to schedule your WRAP energy assessment today.**

**K2 Weatherization • 717-448-4382  
[kretzingenergy@gmail.com](mailto:kretzingenergy@gmail.com)**

**PPL Electric's WRAP program helps you save electricity with energy-saving tips and products.**

*You're one step away from a free energy assessment and energy efficient upgrades.*



**For more info about WRAP, visit [ppl electric.com/wrap](http://ppl electric.com/wrap) or scan here:**



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Attachment PA PUC 1-34-4



**PPL Electric Utilities**

**Don't wait to start saving.**

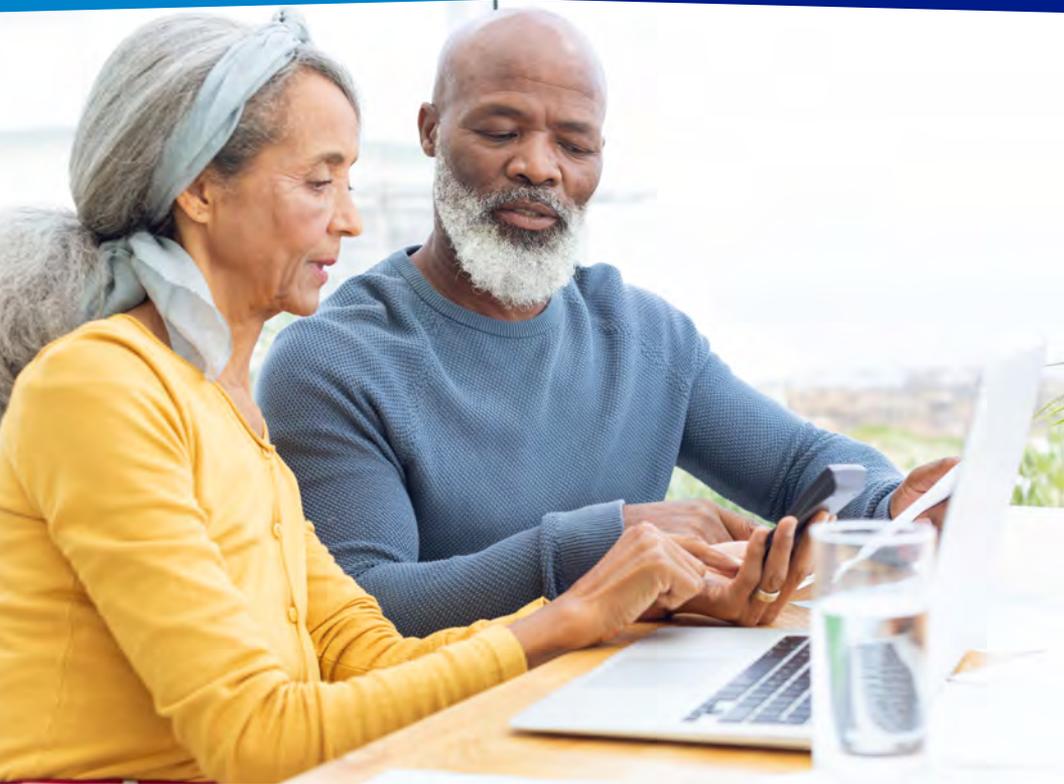
**Call us to schedule your WRAP energy assessment today.**

**True Management, LLC • 484-866-8011  
[info@truemanagementllc.com](mailto:info@truemanagementllc.com)**



# wrap

# wrap



**PPL Electric Utilities' WRAP program** is designed to help you save electricity and improve your comfort. The free products you received are step one in using less electricity at home. The choices you make are important as well. This guide will help you combine your energy efficiency products and electricity choices to get the best results from the WRAP program.



## Programs to Help

Apply for any of these assistance programs at [ppllectric.com/billhelp](https://ppllectric.com/billhelp) or call us at **1-800-342-5775**.

**ERAP** – The Emergency Rental Assistance Program (ERAP) is a federal program to help income-eligible renters impacted by COVID-19. ERAP provides grants to help with rent and utility bills. Visit our website and locate your county for more information on how to apply.

**OnTrack** – Our OnTrack program offers lower monthly payments, debt forgiveness and protection from shut-off for income-eligible families.

**Operation HELP** – Our Operation HELP program offers income-eligible customers who are not currently enrolled on OnTrack, grants toward their energy bills.

**CARES** – Our Customer Assistance and Referral Evaluation Services (CARES) is a special service for customers with a good payment history who cannot pay the full amount of their electric bill due to a temporary hardship, such as illness, injury or a significant decrease in household income. CARES can temporarily protect your family from shut-off.

**LIHEAP** – The federal Low-Income Home Energy Assistance Program (LIHEAP) provides grants to help income-eligible customers with home heating bills between October and April. You don't need a past due balance to qualify and both homeowners and renters are eligible.



## Energy-Saving Tips

### Heating

- Turn down the thermostat when you're sleeping or away from your home for the day (unless you have an electric heat pump).
- Open shades, blinds, or drapes to let the sun in.
- Clean warm-air registers, baseboard heaters and radiators to improve energy efficiency.
- Refrain from using high-wattage electric space heaters, which if used daily, can increase your bill by \$50 a month or more.

### Cooling

- Set air conditioner at the recommended 75–78 degrees.
- Close curtains, blinds, or drapes to keep the sun out.
- Keep air conditioner filters clean to improve energy efficiency.
- Close doors to rooms you're not using.

### Water Heating

- Don't let the water run when preparing food or washing dishes.
- Wash and rinse full loads of laundry in cold water.
- If you have a heat pump water heater, use the "hybrid" setting whenever possible and change your filter monthly.

## Clothes Drying

- Air-dry laundry on a clothesline or drying rack.
- Empty the lint in the dryer after every load.
- Throw one or two tennis balls in the dryer to create air spaces between bundles of wet clothing.

## Kitchen Appliances

- Set refrigerator temperature at 36–39 degrees and freezer at 0 degrees.
- Keep coils behind or underneath the refrigerator clean to improve energy efficiency.
- Be sure your dishwasher is full, but not overloaded when running.

## Other

- Use LED bulbs for indoor and outdoor lighting.
- Turn off your computer and monitor when not in use.
- Unplug chargers when electronics are fully charged or not in use.
- If purchasing a product or appliance, look for the ENERGY STAR® label.
- Run kitchen, bath and whole house fans as instructed by your Energy Coach to ensure your home is ventilated properly.

## Safety

- If you have a carbon monoxide (CO) detector that uses batteries, do NOT remove the batteries if the alarm sounds. Follow the instructions provided by the manufacturer's recommendations.
- Test the batteries in your smoke alarm at least twice a year.



## Your Electric Use

Most homes have dozens of items that use electricity on a daily basis. Air conditioning and heating may add to your normal electricity usage as seasons and temperatures change. Everything else, we consider "baseload" usage for items such as lights and electronics that are used all throughout the year.

### How is electricity measured?

Electricity is measured in kilowatt hours (kWhs). The two factors that affect kWhs used are the wattage of the device or appliance and length of time used. Below are the steps to calculate the monthly electricity used for any appliance or device.

1. Find the wattage of the appliance.
2. Divide by 1,000.
3. Multiply by hours used per day.
4. Multiply by hours used per month.
5. Multiply by the cost per kWh.

***\*This will vary based on the price to compare or the rate you're paying for electricity supply.***

**For example, you use a 1,500 watt space heater eight (8) hours per day during January. The calculations for your monthly electric bill are as follows:**

- The wattage of the space heater is 1,500 watts.
- Divide by 1,000 = 1.5
- Multiply 1.5 by 8 hours per day = 12
- Multiply 12 by 31 days in January = 372 kWhs.
- Multiply 372 by your cost per kWh. For example,  $372 \times \$0.14$  per kWh = \$52.08

**Here is another example. You use two 60-watt incandescent lights in your living room four (4) hours per day. The calculations for your monthly electric bill are as follows:**

- The wattage of your lights is 120 watts (2 bulbs, 60 watts each).
- Divide by 1,000 = .12
- Multiply .12 by 4 hours per day = .48
- Multiply .48 by 31 days in January = 15 kWhs.
- Multiply 15 by your cost per kWh. For example,  $15 \times \$0.14$  per kWh = \$2.10

**You can swap out your incandescent bulbs to LEDs and get the same amount of light for about 10 watts. The calculations are now as follows:**

- The wattage of your lights is 20 watts (2 bulbs, 10 watts each).
- Divide by 1,000 = .02
- Multiply .02 x 4 hours per day = .08
- Multiply .08 by 31 days in January = 2.5 kWhs.
- Multiply 2.5 by your cost per kWh. For example,  $2.5 \times \$0.14$  per kWh = \$.35

***You saved 12.5 kWhs or \$1.75 in one month just by changing two light bulbs!***

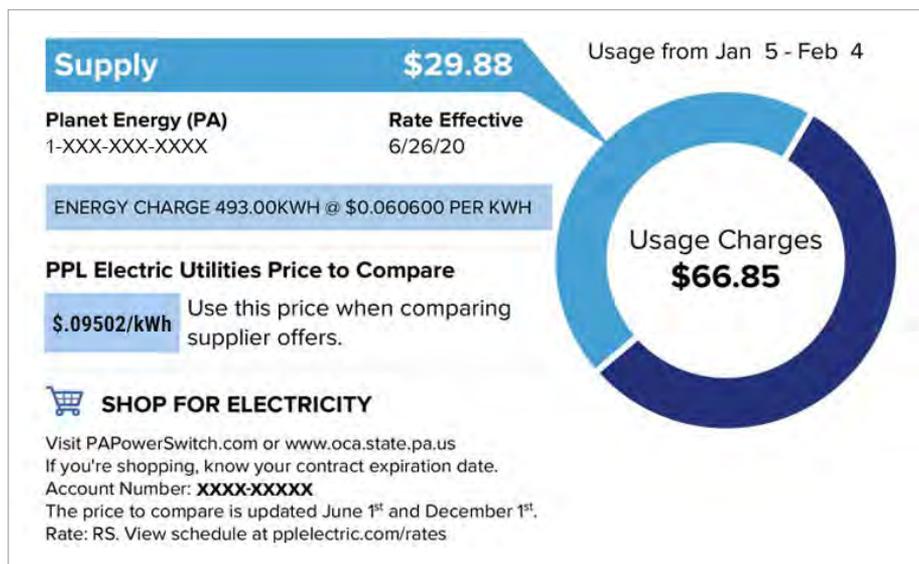
## Your Delivery Charges

We deliver the power to your home, but don't own or operate the power plants where that electricity is generated. This is what you pay every month for the safe and reliable delivery of your power, including the poles, wires and service.



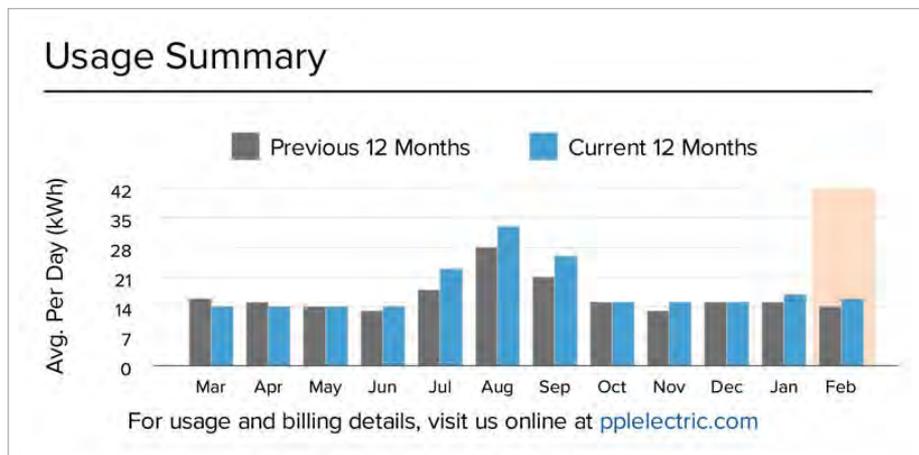
## Your Supply Charges and the Price to Compare

The "supply" section shows the charge for the generation of the power you use. The Price to Compare is the rate you pay if you choose not to shop for a supplier and pay PPL's default rate instead. This rate changes every June and December. Compare your "energy charge" to the price to compare to make sure you're getting a good deal on supply.



## Your Usage Summary

Check out this year-over-year comparison of your electricity use to see how some minor lifestyle changes could save you a few dollars.



PPL Electric Utilities



## **What happens after you receive WRAP?**

Your satisfaction with WRAP is important to us. After you participate in WRAP, you may receive a phone call asking you to complete a survey. In some cases, a WRAP inspector may come to your home to check the products that were installed and to offer additional energy coaching.

Remember that your use of electricity may vary during different seasons and if your household members and habits change. Please refer to information from your Energy Coach for personalized energy suggestions throughout the year. For additional information, you can also visit **[pplelectric.com](http://pplelectric.com)**.

# Customer Information

(to be completed by contractor)

**Thank you again for your participation in PPL's WRAP.**

**Below is some information about your electric bill and household energy use.**

Average Monthly Bill (based on \_\_\_\_\_ months) = \$ \_\_\_\_\_

Average Monthly Usage (based on \_\_\_\_\_ months) = \_\_\_\_\_ kWhs

PPL Delivery Rate: \$ \_\_\_\_\_

Supply Rate (PPL default or Supplier price) \$ \_\_\_\_\_

Name of supplier: \_\_\_\_\_

Average cost per kWh \$ \_\_\_\_\_

## For OnTrack Customers

OnTrack Start Date \_\_\_\_\_

On Track Payment \$ \_\_\_\_\_

OnTrack Shortfall Amount \$ \_\_\_\_\_

*Please refer to your OnTrack Enrollment Letter for your OnTrack Benefit Amount.*

## Notes from Energy Coach

Energy Coach Signature \_\_\_\_\_

Energy Coach Comments/Suggestions \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Organization \_\_\_\_\_

Customer Signature \_\_\_\_\_ Date \_\_\_\_\_



PPL Electric Utilities

# PPL Electric Utilities

PPL Electric Utilities • Update

PPL Electric Utilities Corporation  
Docket No. M-2022-3031727  
Attachment PA PUC 1-34-6

Keep your home warm this winter with a free grant from the federal LIHEAP program. See if you're eligible and apply today:

[ppl electric.com/liheap](http://ppl electric.com/liheap)

#BillHelp #PPLCares



**We're Here For You**

To see how we can help, visit [ppl electric.com/billhelp](http://ppl electric.com/billhelp)



## PPL Electric Utilities

PPL Electric Utilities • Update

LIHEAP helps both homeowners and renters with their energy bills. And you don't need a past-due balance to apply. Grants can help offset the cost of winter heating bills or prevent a shut-off. See if you're eligible and apply: [ppl electric.com/liheap](http://ppl electric.com/liheap)

#BillHelp #PPLCares



**We're Here For You**

To see how we can help, visit [ppl electric.com/billhelp](http://ppl electric.com/billhelp).

**Subject:** Last chance for a LIHEAP grant

**Preheader:** Respond by May 2

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## Time is running out for a LIHEAP grant

Since you received a LIHEAP grant this season, you're qualified for additional funding to help with your past due balance. These dollars can help you avoid a shut-off.

And best yet- we'll apply for you. All we need is your consent.

Do we have your permission to apply for a LIHEAP grant on your behalf?

Yes

Connect with us



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PPL Electric Utilities

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Permit No 93

## See if you qualify for lower monthly payments.

*If you need help paying your electric bill, you may  
qualify for some relief through our OnTrack program.*

Fill out a simple application at [ppllectric.com/ontrack](https://ppllectric.com/ontrack)  
and see if you're eligible for these great benefits:

- Lower monthly payments
- Debt forgiveness
- Energy savings

*Don't wait another day –  
apply for OnTrack and start saving today!*





# PPL Electric Utilities Corporation

PPL Electric Utilities •  Update  
Docket No. M-2022-3031727  
Attachment PA PUC 1-34-10

Our OnTrack program offers:

Lower monthly payments 

Debt forgiveness for past due accounts 

Referrals to energy saving programs 

Apply today at [ppl.com/ontrack](https://ppl.com/ontrack)



## We're Here For You

To ask how we can help, visit [ppl.com/ontrack](https://ppl.com/ontrack)

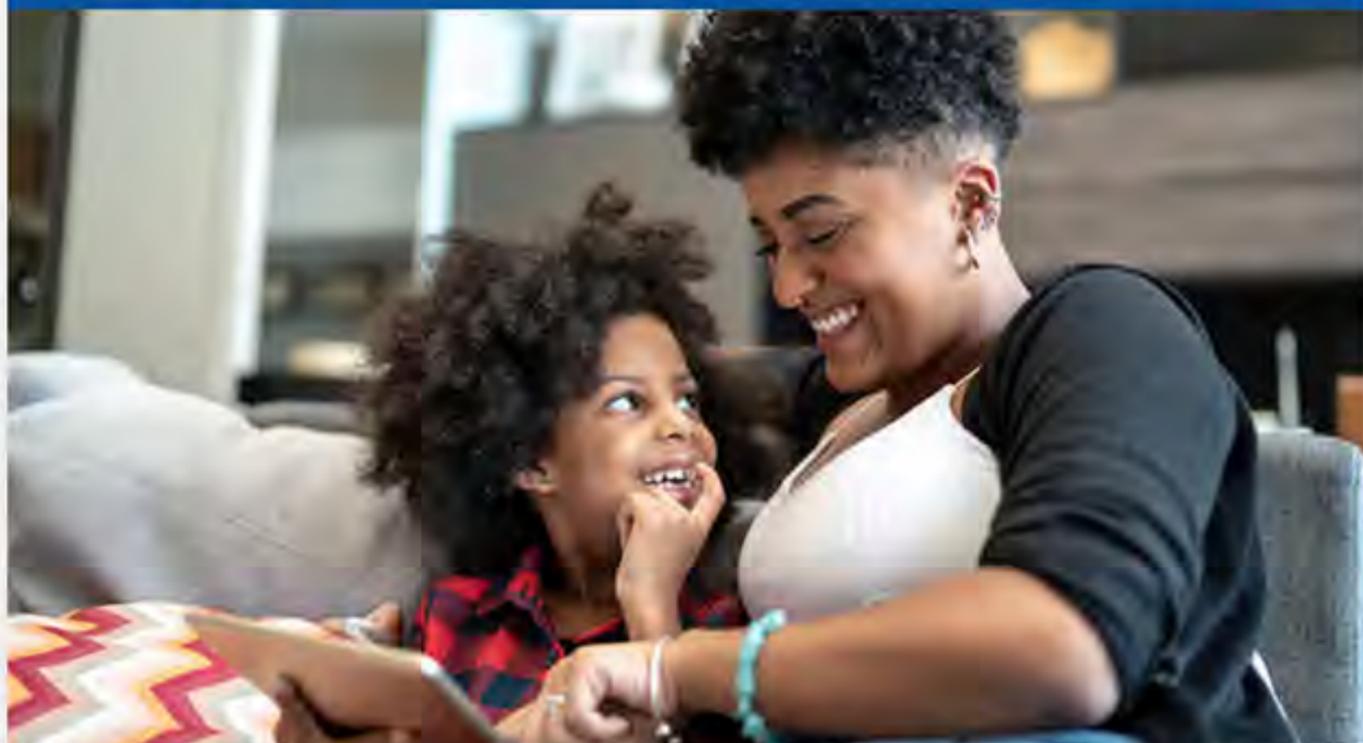
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## You're prequalified for OnTrack. Apply today.

We want to help you save on your electric bill! Because you received LIHEAP this season, you may be eligible for some relief through our OnTrack program.

OnTrack makes managing your electric bill easier with these great benefits:

- Lower monthly payments
- Debt forgiveness for past due accounts
- Energy savings

And even better – it's easy to [apply for OnTrack](#) on our website. You can upload files or photos of the required documents for quick processing.

Here's what you need to get started:

- PPL bill account number
- Names and ages of each resident in your home
- 30-day income information for each resident
  - Paystubs, social security, unemployment benefits, child support payments and pension statements are just a few examples.

**Don't wait another day to start saving.**

[Apply online](#) or call us at [1-800-342-5775](tel:1-800-342-5775).

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# Falling behind on your bill? We can help.

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**Report an Outage**



**Start, Stop or Move Service**





# PPL Electric Utilities

PPL Electric Utilities Corporation May 25

PPL Electric Utilities • Update

Docket No. M-2022-3031727

Attachment PA PUC 1-34-13

If you're interested in [#WaysToSave](#), our WRAP program offers free energy saving products and services. See if you qualify and apply today:

[ppl electric.com/wrap](http://ppl electric.com/wrap)



**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-35. The Proposed 2023 USECP is not consistent with LIURP regulations at 52 Pa. Code § 58.10(c) and does not make a distinction between customers with income at 150% of the FPIG and special needs customers at the 151% through 200% FPIG tier, who can be served with up to 20% of PPL's LIURP budget. Accordingly, PPL is directed to clarify this inconsistency. PPL is also directed to clarify if eligible customers with household incomes at 150% of the FPIG are required to be "special needs" and whether funding for services for these customers are included in the 20% of the LIURP budget spent on customers within the 151% and 200% FPIG tier.

A. PA PUC 1-35. PPL Electric clarifies that Point 1 listed on page 25 of the 2023-2027 USECP should be revised as follows:

"Household income is at or below 150 percent of the FPIG. Section 58.2 of the Commission's regulations defines "[s]pecial needs customer" as "[a] customer having an arrearage with the covered utility and whose household income is at or below 200% of the Federal poverty guidelines." 52 Pa. Code § 58.2. Under Section 58.10(c) of the Commission's regulations, "A covered utility may spend up to 20% of its annual program budget on eligible special needs customers as defined in § 58.2 (relating to definitions)." *Id.* § 58.10(c).

The Company will spend up to 20% of its LIURP annual program budget on special needs customers that are between 151% - 200% of the FPIG, including customers living in multi-unit projects who could best benefit from "whole building" treatments as well as customers referred through inter-utility coordination."

Additionally, PPL Electric clarifies that, as defined by Section 58.2 of the Commission's regulations, any customer who has an arrearage with PPL Electric and whose household income is at or below 200% of the FPIG is considered "special needs."

Therefore, a customer with a household income at 150% of the FPIG is considered "special needs" so long as they have an arrearage with PPL Electric. However, such a customer would not fall within the category of special needs customers with household incomes between 151% and 200% of the FPIG for whom the Company will spend up to 20% of its LIURP annual program budget. Instead, the customer would receive LIURP services through the remainder of the LIURP annual program budget.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-36. Explain the methodology PPL uses to select 30% of all full-cost jobs to receive a site inspection and 25% of baseload and low-cost jobs to receive a phone inspection. Furthermore, PPL is directed to explain what a phone inspection entails and clarify if all recipients of full-cost jobs receive a phone inspection if they are not selected to receive a site inspection. PPL is also directed to provide its usage threshold for additional education and services if a customer's usage increases within 12 months after post installation of WRAP measures.

A. PA PUC 1-36.

**Methodology**

- The Company's plan indicates a minimum of 30% of full cost jobs will be inspected. However, the Company assigns the majority of full-cost jobs for field inspections. Full cost cases not assigned for field inspection are assigned for phone inspection.
- Low-cost jobs not assigned for field inspection may be assigned for field or phone inspection.
- All baseload jobs are assigned for phone inspection monthly and are contacted until 25% of the total assigned are completed.
- Inspection may be waived for all job types if minimal measures are provided.

**Phone Inspections**

- Phone inspections are completed in LEAP, PPL Electric's WRAP system.
- The objectives of the phone inspection include:
  1. To confirm that measures invoiced were installed;
  2. To assess customer satisfaction;
  3. To capture demographic data needed for the annual LIURP Report;
  4. To assess if customer needs follow-up with bill; and
  5. To offer Full Cost recipients follow-up energy education

**Usage threshold**

- PPL Electric runs a monthly report of program participants, post-11 months from final installation date, to identify usage changes. Customers with an increase or decrease of 10% or greater receive a letter recognizing the savings or alerting to an increase in usage. Contractors are provided with the list to review for possible additional measures or remedial energy education.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-37. Clarify if the minimum usage requirement is waived when coordinating WRAP services with DCED's WAP, gas utility LIURP/weatherization programs, or county weatherization programs.

A. PA PUC 1-37. PPL Electric confirms that it waives the minimum usage requirements when coordinating work with other weatherization programs. This is consistent with current Company practice under the 2017-2019 USECP and does not represent a plan change.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-38. Provide details of PPL's certification requirements for contractors and PPL or other staff conducting field observations.

A. PA PUC 1-38. PPL Electric requires that all of its WRAP contractors meet the following qualifications:

- Contractor shall assure that all workers that perform audits, installations, and/or inspections must have the appropriate Building Performance Institute ("BPI") Certifications or Pennsylvania State equivalent certification as determined by PPL Electric. Some jobs may be required to have at least one installer that is certified in Lead Renovation and will oversee safe lead practices on a WRAP job as applicable.
- PPL Electric may require additional certification during the contract period based on federal, state, and industry standards and requirements. Contactor shall provide proof of certification(s) and subsequent recertification(s) upon request.
- Field observations by PPL Electric program staff are to ensure adherence to procedures, customer interactions, OnTrack education, and soft skills.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-39. Clarify how customer consent for WRAP services is obtained. If customer consent is obtained in writing, PPL is directed to provide a copy of its consent form.

A. PA PUC 1-39. Customers that apply online give their consent when the application is submitted.

Customers applying over the phone must sign the consent form at the time of the audit. Contractor can obtain the signature on paper or electronically in LEAP. If obtained on paper, contractor attaches the signed document in LEAP.

Customers who submit a paper application provide their consent on the application.

A copy of the application where PPL Electric obtains consent is attached hereto as Attachment PA PUC 1-39.

Form 3589 (Revised 4/2022)

**WEATHERIZATION APPLICATION**

**YOU MUST COMPLETE ALL INFORMATION TO QUALIFY FOR WRAP**

Today's Date		PPL Bill Account No.		Telephone No. ( )		
Ratepayer Name		E-mail Address		Secondary Telephone No.(Cellular No./Work No.) ( )		
Caller Name (if other than ratepayer)		Address				
City/Boro/Twp.		County		State PA	Zip	
<b>Total Income for last 12 Months</b> Your total income is the combined amount of gross income earned by all contributing family members		<b>Main Source of Household Income</b>		<b>Additional Household Income (Check all that apply)</b>		
\$ _____ <input type="checkbox"/> Annual Gross income \$ _____ <input type="checkbox"/> Monthly Gross income <b>Number of Occupants by Age Group</b> _____ Under 18    _____ 18-62    _____ Over 62 _____ <b>Total</b>		<input type="checkbox"/> Wages, Salaries, Tips, Commissions Name of Employer: _____ <input type="checkbox"/> Public Assistance <input type="checkbox"/> Pension/Retirement/Social Security <input type="checkbox"/> Unemployment compensation <input type="checkbox"/> Disability <input type="checkbox"/> Other		<input type="checkbox"/> Wages, Salaries, Tips, Commissions Name of Employer: _____ <input type="checkbox"/> Public Assistance <input type="checkbox"/> Pension/Retirement/Social Security <input type="checkbox"/> Unemployment compensation <input type="checkbox"/> Disability <input type="checkbox"/> Other		
<b>What is the Employment status of head of household?</b>		<b>Estimated Year Home Built</b> _____	<b>Landlord Contact Method</b> (Please Provide at least one of the following contact methods for your landlord)		<b>Type of Home</b>	
<input type="checkbox"/> Full- Time Employment (35 or more hours a week) <input type="checkbox"/> Part- Time Employment (34 or fewer hours a week) <input type="checkbox"/> Unemployed worker (currently not employed) <input type="checkbox"/> Retired <input type="checkbox"/> Homemaker <input type="checkbox"/> Student <input type="checkbox"/> Other		<b>Do you own your home?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No Monthly Rent \$ _____ Monthly Mortgage \$ _____ <b>Landlord Name:</b> _____ <b>Landlord Address:</b> _____ _____		<b>Landlord Phone:</b> _____ <b>Landlord Fax:</b> _____ <b>Landlord Email:</b> _____ <b>Who owns your refrigerator?</b> <input type="checkbox"/> Self <input type="checkbox"/> Landlord <input type="checkbox"/> N/A		<input type="checkbox"/> 1 1/2, 2 or more story single family <input type="checkbox"/> Other <input type="checkbox"/> Row house, inside of row <input type="checkbox"/> Multi-Family, including condo, with 3 or more units <input type="checkbox"/> Mobile Home <input type="checkbox"/> Ranch, single level <input type="checkbox"/> Bi-level or split level <input type="checkbox"/> Row house, end of row <input type="checkbox"/> Duplex or condominium w/ two units <input type="checkbox"/> Manufactured/Modular Housing
<b>What Type of installed Heating does your home have?</b>		<b>Do You Use Other Heat? (Check all that apply)</b>	<b>If You Use Electric Heat, check type</b>	<b>What is the type of Air Conditioning in your home?</b>		<b>Customer Contact Information:</b>
Electric <input type="checkbox"/> Other <input type="checkbox"/> City Steam <input type="checkbox"/> Solar <input type="checkbox"/> Pellet Stove <input type="checkbox"/> Fuel Oil/Kerosene <input type="checkbox"/> Utility Gas <input type="checkbox"/> Bottle Gas/Propane <input type="checkbox"/> Coal <input type="checkbox"/> Wood <input type="checkbox"/> None <input type="checkbox"/> Don't Know <input type="checkbox"/> Electric Space Heater <input type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> Warm Air Furnace <input type="checkbox"/> Hot Water <input type="checkbox"/> Heat Pump <input type="checkbox"/> Baseboard, Wall Heater <input type="checkbox"/> Ceiling / Floor Cable <input type="checkbox"/> Space Heater (plug-in) <input type="checkbox"/> Other	<input type="checkbox"/> Central <input type="checkbox"/> Room air conditioner(s) <input type="checkbox"/> None <b>Appliance Information:</b> <b>Does your home have an electric water heater?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't Know <b>Do you have an electric clothes dryer?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't Know <b>Additional Information</b> <b>How did you hear about WRAP?</b> <input type="checkbox"/> Friends/Neighbors <input type="checkbox"/> Outreach Event <input type="checkbox"/> Other <input type="checkbox"/> PPL Electric Utilities Bill Insert <input type="checkbox"/> PPL Electric Utilities Phone Call <input type="checkbox"/> PPL Electric Utilities Letter <input type="checkbox"/> PPL Electric Utilities Email <input type="checkbox"/> PPL Electric Utilities Website <input type="checkbox"/> OnTrack Program <input type="checkbox"/> Community Agency <input type="checkbox"/> Radio/TV/Newspaper		<b>Primary Phone Number:</b> _____ <b>Primary Email:</b> _____ <b>Please provide any additional information to help Schedule WRAP work:</b> _____

**PLEASE READ THE TERMS AND CONDITIONS ON Page 2 OF THIS APPLICATION.→**

## WRAP Terms and Conditions

WRAP is a program designed to save you money on your electric bill and improve your comfort. If you are found eligible for WRAP, you will receive:

- A free home energy audit by an authorized WRAP contractor.
- The installation of free energy saving measures in your home. Any measures that you receive will depend on the results of the audit, your electricity usage and established WRAP guidelines. Measures **may** include the installation LEDs, appliance replacement, insulation, weatherstripping and caulking.
- At least one free Energy Education Session. The educator will help you manage your energy use.
- Authorized WRAP contractors will contract with you to do the work, and will provide at least a one-year warranty on their work.

In exchange, we ask that you do the following:

- Give permission for PPL Electric Utilities to release the application and electric usage history to weatherization organizations. **PPL Electric Utilities may verify your application information and any false information on the application may result in disqualification from WRAP.**
- Cooperate in scheduling appointments with all WRAP contractors
- Consent to the installation of free weatherization measures recommended during the audit, and agree to work with WRAP contractors to save energy in your home.
- If you are offered and agree to accept a new, energy-efficient appliance as part of WRAP, you must consent to the removal of the existing one; it will not be returned to you. If the appliance is the property of the landlord, you must agree not to sell or destroy the appliance while living at your present address and may not take the appliance with you should you move.

In Consideration for PPL agreeing to pay for the costs related to the above, you, on behalf of yourself, all residents in your home, minor children, intending to be legally bound, do hereby release PPL Electric Utilities Corporation, its parent, affiliates, and employees of and from all suits, claims, demands, actions, damages or contributions, for whatever reasons, including alleged negligence, arising out of, resulting from, or in any manner caused by or in connection with the above including the performance of such authorized WRAP contractors or any equipment or materials they furnish or install. By signing this document, you will not be releasing the authorized WRAP contractor from liability for its work

**I affirm that all information provided on the application, either by phone, mail, or online, is true and complete. I am aware that I can be penalized for making false or incomplete statements. Penalties may include, but not be limited to, removal from WRAP and repayment of all costs for services and weatherization measures provided by WRAP.**

If you understand and agree to the above conditions, please sign your name on this application. If you have any questions, please call PPL Electric Utilities at 1-888-232-6302.

\_\_\_\_\_  
Customer Signature

\_\_\_\_\_  
Date

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-40. Explain what criteria or situations would initiate a case-by-case review of applicants who have received WRAP or Act 129 services within the five-year timeframe and what circumstances would qualify them for additional WRAP services. PPL is also directed to clarify its reason for proposing to expand WRAP's re-weatherization timeframe from three years to five years.

A. PA PUC 1-40. PPL Electric staff review requests from applicants to receive additional WRAP services prior to the eligibility timeframe. An exception can be made to provide additional services prior to the criteria time limit if the Company determines upon review that:

- The services provided were limited due to no landlord consent, and there is an opportunity for more measures;
- The customer was unable to fully participate in WRAP and is now able to do so;
- The customer was not eligible for a measure when served but may now be eligible (having a water heater or appliance break after measures were provided, as an example); or
- Other exceptions requests based on extenuating circumstances to be decided on a case-by-case basis.

PPL Electric is proposing to change the re-weatherization timeframe from three to five years in order to align with the Act 129 timeframe. This will help the Company coordinate both programs and avoid customer confusion.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
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Q. PA PUC 1-41. Explain whether there are issues or concerns with automatically enrolling OnTrack customers into WRAP if they have annual usage of 6,000 kWh or higher.

A. PA PUC 1-41. PPL Electric is concerned that auto-enrolling every OnTrack customer with annual usage above 6,000 kWh in WRAP will create an unmanageable backlog. PPL Electric enrolled over 40,000 customers in OnTrack in 2021 and does not believe that lowering the auto-enrollment threshold for WRAP would benefit either program. The Company's focus on auto-enrolling OnTrack customers with annual usage of 18,000 kWh or greater is to help those more likely to exhaust their OnTrack benefits manage their electric usage. That being said, the Company still encourages all OnTrack customers to enroll in WRAP. New OnTrack customer enrollments with less than 18,000 annual kWh are contacted by CMC Energy, the Act 129 CSP, to solicit for WRAP services. The Company also conducts targeted outreach throughout the year.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-42. Clarify how PPL will ensure that communities receive the same level of WRAP services for the next five years with less WRAP contractors and CBOs. Further, PPL is directed to provide the number of full-cost, low-cost, and baseload WRAP jobs completed annually from 2018 through 2021 for each county that PPL serves. PPL is also directed to provide the annual number of full-cost, low-cost, and baseload WRAP jobs it projects to complete for the same counties from 2023 through 2027.

A. PA PUC 1-42. PPL Electric has always managed the process to ensure our service territory is served equitably. This process has not changed with the reduced number of contractors. The Company selects contractors that can effectively and efficiently provide delivery of program services across the 29-county service area. The Company's current WRAP contractor partners have demonstrated that they have the expertise to perform the work, can handle the jobs assigned to them, and can operate across the service territory.

The requested job data is below.

**2018-2021 Job completions by job type and county:**

Count of Case Number	Column Labels			2018 Total			2019 Total			2020 Total			2021 Total			2021 Total	Grand Total
	2018	2018	2018	2018	2018	2018	2019	2019	2019	2020	2020	2020	2021	2021	2021		
Row Labels	Base Load	Full Cost	Low Cost	Base Load	Full Cost	Low Cost	Base Load	Full Cost	Low Cost	Base Load	Full Cost	Low Cost	Base Load	Full Cost	Low Cost		
BERKS	20	20	20	60	5	22	3	30	16	6	3	25	16	26	8	50	165
BUCKS	11	27	23	61	11	18	14	43	6	7	9	22	4	13	17	34	160
CARBON	37	60	62	159	43	26	34	103	23	22	20	65	20	97	28	145	472
CHESTER	4	4	3	11	1	3	2	6	5	2	1	8	7	5	1	13	38
CLINTON	14	6	21	41	22	11	22	55	8	2	21	31	5	9	15	29	156
COLUMBIA	18	34	56	108	40	33	61	134	2	8	9	19	43	43	37	123	384
CUMBERLAND	58	108	24	190	35	98	17	150	24	22	8	54	110	181	24	315	709
DAUPHIN	134	177	34	345	95	155	41	291	65	45	12	122	132	174	33	339	1097
JUNIATA	9	8	7	24	3	8	9	20	6	2	5	13	4	4	8	16	73
LACKAWANNA	52	59	43	154	72	44	68	184	39	21	18	78	91	50	29	170	586
LANCASTER	223	262	58	543	131	229	38	398	135	75	16	226	182	248	48	478	1645
LEBANON	1	5	4	10		1		1	1	2		3		3	4	7	21
LEHIGH	99	195	182	476	116	168	148	432	80	81	104	265	113	316	196	625	1798
LUZERNE	93	126	94	313	104	91	121	316	20	27	41	88	96	100	117	313	1030
LYCOMING	33	29	57	119	33	24	53	110	31	6	45	82	39	16	44	99	410
MONTROE	30	279	24	333	46	307	18	371	30	92	8	130	39	548	46	633	1467
MONTGOMERY	4	16	10	30	8	12	7	27	8	6	4	18	3	12	5	20	95
MONTOUR	6	4	4	14	4	1	2	7		1	1	2	13	3	9	25	48
NORTHAMPTON	38	64	55	157	36	42	38	116	23	28	32	83	45	80	38	163	519
NORTHUMBERLAND	46	60	32	138	51	81	21	153	39	13	12	64	91	65	29	185	540
PERRY	15	30	18	63	10	15	19	44	13	3	8	24	33	16	15	64	195
PIKE	14	31	5	50	17	11	4	32	11	2	2	15	6	23	5	34	131
SCHUYLKILL	151	79	45	275	120	69	28	217	36	16	13	65	90	107	29	226	783
SNYDER	19	18	18	55	13	17	20	50	14	5	6	25	21	16	17	54	184
SUSQUEHANNA	3	2	3	8	8		3	11	2			2	1	3	1	5	26
UNION	6	17	8	31	6	10	9	25	4	4	3	11	13	2	4	19	86
WAYNE	49	66	18	133	54	39	16	109	35	5	9	49	49	96	20	165	456
WYOMING	2	2	1	5	3	1	2	6	3			3	1	6		7	21
YORK	7	6	2	15	6	6		12	3	3	2	8	10	10	1	21	56
Grand Total	1196	1794	931	3921	1093	1542	818	3453	682	506	412	1600	1277	2272	828	4377	13351

**Projections for 2023-2027 job completions by job type:**

Full Cost	1750
Low Cost	750
Baseload	1000
Total Jobs	3500

Estimated completions are subject to fluctuate based on contractor pricing adjustments that reflect material pricing changes.

**Projections for 2023-2027 job completions by county:**

County	# jobs
Berks	30
Bucks	45
Carbon	100
Chester	10
Clinton	60
Columbia	131
Cumberland	180
Dauphin	300

Juniata	19
Lackawanna	180
Lancaster	390
Lebanon	5
Lehigh	424
Luzerne	315
Lycoming	120
Monroe	360
Montgomery	25
Montour	10
Northampton	120
Northumberland	160
Perry	50
Pike	30
Schuylkill	215
Snyder	50
Susquehanna	10
Union	25
Wayne	110
Wyoming	10
York	15
	3,500

Forward looking projections are made based on historical data by county. Total estimated completions by county for 2023-2027 were not broken out by job type. However, final completions by county relies on customer cooperation within those counties.

**PPL Electric Utilities Corporation**  
**Response to Supplemental Information Request of the**  
**Pennsylvania Public Utility Commission**  
**July 14, 2022**  
**Docket No. M-2022-3031727**

Q. PA PUC 1-43. Provide an impact analysis of the DHP Pilot since its inception, including its impact on residential usage and heating.

A. PA PUC 1-43. The DHP Final Report was submitted to the PUC in April, 2020, with the LIURP Annual Narrative Report, and is attached hereto as Attachment PA PUC 1-43.

**PPL Electric Utilities: 2018 LIURP Report**  
**Ductless Heat Pump Pilot**  
**April 29, 2020**

PPL Electric Utilities Implemented a Ductless Heat Pump (“DHP”) Pilot as part of its LIURP in 2018. PPL proposed the pilot in its 2017-2019 Universal Service Plan as a result of a WRAP Contractor survey that was issued in March 2016. The Company had not implemented any new heating measures in over a decade. LIURP Contractors suggested implementing a “ductless heat pump” or “mini split” system as a possible way of helping customers save electricity, particularly when customers have received standard weatherization measures and electric usage remains high.

The PUC approved PPL’s universal service plan and DHP Pilot in December 2017. In accordance with the plan, PPL would fund the installation of up to 25 DHP systems at a total maximum cost of \$250,000 out of its LIURP budget.

Twelve LIURP contractor organizations installed 25 DHP systems between June and December 2018. The Company provided a narrative report and preliminary savings data to the PUC Bureau of Consumer Services (BCS) in April 2019. This report concludes the twelve-month impact evaluation of the pilot.

**Background**

PPL and LIURP Contractors worked together to define the objectives, site selection criteria, equipment specifications and process for the pilot. The objectives included:

1. Measure the cost-effectiveness of the DHP as a pilot and potentially as a standard LIURP measure.
2. Develop site selection criteria and determine the qualifications for a “good” site.
3. Measure customer satisfaction to include feedback on system comfort.
4. Engage the LIURP contractor network as auditors, installers, educators and/or inspectors and document “lessons learned.”
5. Determine the feasibility and next steps for implementing the DHP as a standard LIURP measure.

The pilot team agreed to target new or recent LIURP recipients who had at least 50% installed electric heat with a minimum of twelve months consumption history. De facto or electric space heating households with two years consumption history would be considered. The home needed to be structurally sound with no health and safety measures that would impede the operation of the system. Finally, the family must be willing to participate in at least two pre-installation education sessions – one with the initial WRAP auditor and one with the DHP installer – to understand the operation of the system and to realize that the comfort of a DHP may differ from other heating and cooling systems. The pilot was offered to homeowners and renters with PPL approval.

The initial site selection criteria required a minimum of 15,000 seasonal kWhs. Some LIURP Contractors reported difficulty in finding homes that met the usage criteria, particularly in smaller homes. Smaller homes may mean less indoor components and a lesser system cost. Therefore, PPL agreed to eliminate this requirement early in the pilot.

PPL Electric proposed a minimum heating seasonal performance factor (HSPF) of 8.6 and a seasonal energy efficiency rating (SEER) of 16.0 to match the standards required for PPL's energy efficiency (Act 129) residential rebates. All contractors agreed and most installations superseded the minimal equipment standards. After some discussion, the pilot team agreed to accept a minimum standard of -5 degrees Fahrenheit with a recommendation of -15 degrees Fahrenheit particularly in the northern counties of PPL's service area. The group also decided to allow pilot participants to retain electric space heaters and lesser efficient heating systems (e.g. baseboard units) in the event of equipment failure.

When developing the pilot guidelines, most contractors supported using Manual J to conduct a heat loss/heat gain analysis to size the equipment. Some contractors did not believe this was necessary when installing a system to condition only part of the home. PPL consulted a technical expert at the National Sustainable Structures Center (NSSC) who advised using Manual J calculations as heating or cooling zones are rarely totally isolated. Also, most DHP equipment companies require load calculations as part of the warranty. PPL decided to include Manual J calculations as a requirement with the stipulation that the installer may need to adjust if the cooling load is oversized by more than 20% based on the heating calculations.

PPL encouraged diverse applications for the pilot. Contractors selected their equipment and installation sub-contractors. Contractors could install "whole-house" systems or partial applications. Customers with installed or de facto electric heat systems could participate. Auditors did not need to participate as installers to identify candidates, and customers identified from other weatherization programs (e.g. PA WAP) would be considered. There was no specific limit on installation costs although installers were advised of the funding allocation for the pilot and contractors needed PPL pre-approval for each installation.

All LIURP Contractors used HVAC sub-contractors for the installations. One contractor attempted to use an in-house technician who left the organization after the site selection process. Equipment selection included Daiken (9), Mitsubishi (5) Fujitsu (4), Comfort Maker (3), LF (3) and Carrier (1).

Sixteen systems were sized for "whole house" applications. The other applications were primarily first floor or "great room" applications. The systems consisted of 1-2 outdoor units and 1-7 indoor units. The costs of the systems ranged from \$2,700 - \$17,867. System costs varied with the size of the area conditioned, floor plan, equipment type and features, number of indoor and outdoor units, and complexity of installation. Two-systems, including the highest priced, required the addition of an electrical sub-panel.

Most sites had electric baseboard heat and window air conditioner units prior to the installation unless otherwise noted. All sites had a full twelve months of pre-and-post installation comparison months.

The chart on page #3 depicts the changes in consumption for all pilot participants.

**PPL LIURP – Ductless Heat Pump Pilot Impact Analysis**

Case #	Whole House?	System Cost	Pre-kWh Usage	Post-kWh Usage	Difference kWhs	Change
266015		\$6,988	30,170	32,121	-1,951	-6.5%
272584	x	\$13,200	28,786	29,383	-597	-2.1%
265523		\$9,945	27,674	26,311	1,363	4.9%
259321	x	\$11,098	30,111	28,160	1,951	6.5%
261258		\$7,945	23,822	20,703	3,119	13.1%
265258	x	\$4,924	17,522	15,172	2,350	13.4%
268097	x	\$13,000	34,286	29,419	4,867	14.2%
275587	x	\$13,500	16,306	13,631	2,675	16.4%
266238	x	\$4,525	26,633	22,130	4,503	16.9%
258706		\$9,945	31,575	26,101	5,474	17.3%
266260		\$3,932	31,226	25,498	5,728	18.3%
264588	x	\$8,360	14,688	11,899	2,769	18.9%
265910	x	\$5,900	30,535	24,517	6,018	19.7%
264431		\$6,988	29,024	23,236	5,788	19.9%
262780	x	\$17,867	26,059	20,723	5,336	20.5%
270751		\$5,426	27,862	22,033	5,829	20.9%
259938	x	\$15,995	29,543	23,027	6,516	22.1%
265961	x	\$6,977	24,128	17,314	6,814	28.2%
265894	x	\$12,823	26,545	18,073	8,472	31.9%
261943		\$2,770	38,534	24,341	14,193	36.8%
264423		\$14,635	61,708	38,480	23,228	37.6%
267371	x	\$13,332	23,451	14,282	9,169	39.1%
263859	x	\$9,200	20,018	11,578	8,440	42.2%
270659	x	\$10,250	26,730	13,728	13,002	48.6%
269254	x	\$10,633	23,412	11,733	11,679	49.9%
Summary #1		\$9,606			6,269	22%
Summary #2					5,653	21.3%

The following is a summary of the chart above:

- A total of 23 out of 25 (92%) families reduced electric consumption during the post-period.
- The average household saved 6,269 kWhs during the post period and reduced overall usage by 22%. If you exclude case 264423 as an outlier, the average household saved 5,653 kWhs and reduced overall average by 21.3%.
- The “savings” results during the post-measurement are as follows:

- 2 households increased usage by 0-10%
  - 2 households decreased usage by 1-10%
  - 10 households decreased usage by 11-20%
  - 4 households decreased usage by 21-30%
  - 7 households decreased usage by over 30%
- Most families used electric baseboard for heat and window air conditioners for cooling prior to their mini-split(s) installation.
  - The occupants in cases 259231, 264588, and 259938 used electric space heaters as their primary heat source prior to the pilot. The occupant in case 270659, one of the strongest savers, used a combination of space heaters and an electric boiler.
  - The household members in case 261493 used an electric space heater in the great room and an oil furnace for the remainder of the house. The contractor installed a mini-split system in the great room; this system had the lowest acquisition cost.
  - The average cost of the system installation was \$ 9,606. The average acquisition cost was \$1.53 per kWh saved during the initial year.
  - Eighteen households (72%) participated in a quality assurance post-installation visit. Three households needed remediation work based on the results of the quality assurance visit. This included case 272584 which was a non-saver.
  - Seventeen households (68%) participated in remedial energy education 6-12 months after the installation. The two households that gained energy did not respond to remediation efforts.

## Cost

The cost of the pilot was as follows:

DHP Installations	\$240,160
Quality Assurance Inspections	\$4,271
Post-Installation Education	\$1,554
DHP Inspection Webinar (NSSC)	\$619
<b>Total</b>	<b>\$246,604</b>

## Post-Installation

Customer satisfaction is another critical component of the pilot. Eighteen customers participated in the inspection process. Customers were asked to rank their satisfaction with their DHP installer, the comfort of the system and their overall satisfaction with the system during the inspector’s visit. The average score during the inspection was 4.9 out a possible “5”. Some customers reported an immediate decrease in their electric bill. The singular complaint was the placement of an indoor unit.

Four contractors reported customer call-backs, three of which were the result of the quality assurance inspection. The remote control failed on one system and had to be replaced. Another contractor agreed to raise the outdoor unit. The third DHP recipient had drainage problems and some exterior pipes needed sealing. One customer, who did not comply with the inspection, experienced comfort problems during the cooling season. The installer addressed during the remedial education visit.

Participating contractors offered suggestions on the possible implementation of the DHP as a standard measure through a post installation survey and during a roundtable discussion at the 2019 Universal Service Forum.

Contractor recommendations included:

#### Eligibility (Changes)

- Allow premises with ductwork to participate in situations where it is more cost-effective to replace with a DHP over another system, or, when the ductwork is inadequate for a conventional heat pump.
- Target “high usage” previous WRAP recipients
- Add a requirement that the premise, if sold or rented, is likely to be occupied by a low-income ratepayer.
- Continue to emphasize that the customer should be willing and able to maintain the system.
- Implement a payback formula to justify cost-effectiveness

#### Equipment

- Continue to require Manual J Heat Loss, even for partial applications. Some WRAP Contractors have Manual J software. Others can obtain heat loss calculations at a nominal cost through their DHP supplier/installer.
- Require that systems are rated for -15 to accommodate extreme (but not unheard of) weather conditions. The system cost is several hundred dollars more than systems with lower temperature ratings but may reduce callbacks and increase savings.

#### Installation

- In most cases, it makes sense to sub-contract the installation to an HVAC technician and the LIURP Contractor would charge an administrative fee.
- PPL should provide training, possibly through the NSSC, to all contractors involved. WRAP Contractors do not need training to be installers. However, WRAP Contractors should be familiar with DPH operation and site selection.
- Conduct the third-party inspection in conjunction with the installation.

Some contractors recommending standardizing the price of the installation, others, suggested a higher budget for larger homes. One contractor suggested that the Company require a payback formula to justify cost effectiveness.

Contractor enthusiasm remained high throughout the pilot and evaluation period. Many took pride in finding “the best” site and some have a waiting list for possible future installations.

**Conclusion:**

PPL Electric Utilities and its contractor network successfully developed and implemented the DHP Pilot in 2018. Contractors completed 25 installations at 98.6% of the \$250,000 pilot budget allocation. HVAC sub-contractors installed all systems and used an array of equipment. Customer satisfaction was also very high and there were no major problems identified during the pilot.

The results of the twelve-month impact analysis were impressive. Eighteen households (72%) reduced their overall consumption by more than 15%, and gross usage decreased by over 5,000 kWhs in sixteen households (64%). Even if you take account that some households received thermal integrity measures during the pre-period, the average savings’ results were much higher than conventional full cost jobs.

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Q. PA PUC 1-44. Explain the basis for this omission (addressing requirements for weatherization work in a municipality) and clarify if it is still following the process specified in its 2017 USECP for WRAP work performed in a municipality or if there will be changes to this process.

A. PA PUC 1-44. There is no change to contractors meeting requirements to complete and invoice for permitting required by municipalities. PPL Electric moved this requirement to the contract terms with WRAP contractors rather than having it be an obligation contained in the USECP plan.

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Q. PA PUC 1-45. Provide the factors and numbers PPL used to calculate that 85,825 customers are potentially eligible customers to receive WRAP. These factors may include:

- The number of customers income eligible;
- The number of those customers who meet the usage criteria for WRAP;
- The number of those customers with 9 months of usage history; and
- The number of those customers who have not received WRAP services within the past five years.

In addition, PPL is directed to explain how it determines the projected number of WRAP treatments (e.g., electric heat, water heating, or baseload) provided to potentially eligible customers.

A. PA PUC 1-45.

Confirmed Low-Income over 6,000 kWh	
Total Customers at or below 150%	191,203
Previous WRAP services – last 5 years	57,920
- Sub total	133,283
Estimated Served by Act 129	31,540
- Sub-total	101,743
Drop out-rate (17%)	15,918
- Final total	85,825

“Previous WRAP services” includes completed Act 129 Low Income WRAP cases. The number of estimated customers to be served through Act 129 for the plan period 2023-2027 includes customers with less than 9 months of usage history.

PPL Electric projects the number of future WRAP treatments by using prior year average cost per job, by job type, to calculate current year estimates.

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Q. PA PUC 1-46. Explain how PPL determines the amount of Operation HELP grants issued to eligible customers and whether there is an established minimum or maximum threshold for assistance.

A. PA PUC 1-46. The Company's partner organizations review applicants and make the grant determination based on the specific account information. Operation HELP is not a one size fits all program; instead, the grant is unique to the customer and is intended to help resolve their immediate need.

Additionally, there is no minimum or maximum threshold for assistance. A customer can apply for the program regardless of their balance. However, if the grant is not sufficient to cover the amount needed, the customer may be asked to make a payment or seek additional sources of assistance.

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Q. PA PUC 1-47. Explain how specifically collection status and payment history factor into an eligibility determination for Operation HELP.

A. PA PUC 1-47. The only requirement regarding collection status is that the account is past due. The account may or may not be in collections, but the customer must need assistance to either avoid entering collections or continued collections. Understanding that Operation HELP funds have a limit, the partner organizations prioritize those in imminent collections or whose service has been terminated. Operation HELP provides short term resolution with a one-time grant. If a customer needs long-term assistance, the Company will explore other options with the customer such as OnTrack.

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Q. PA PUC 1-48. Explain why PPL is proposing to:

1. Limit the use of Operation HELP grants for only PPL electric bills rather than continue to provide financial assistance for other energy sources; and
2. Expand income eligibility to 250% of FPIG.

Also, provide the number and amounts of grants issued annually by energy type (e.g., electric, natural gas, oil, etc.) and income tier between 2018 and 2021.

A. PA PUC 1-48.

1. PPL Electric is proposing to limit the use of Operation HELP grants to pay customer electric bills for the following reasons:
  - a. Every regulated utility has assistance programs via CAP and Hardship funds to support their customers. Additionally, other utilities limit their hardship funds to pay only that utility's bills. This change brings PPL Electric into alignment with most other utilities.
  - b. Customers have other programs available to them to cover heating costs. LIHEAP, ERAP, PAHAF, and local agencies have funding available to support other utility programs and deliverable fuels.
2. PPL Electric is proposing to expand income eligibility from 200-250% of poverty for the following reasons:
  - a. TPPL Electric made this change with Commission approval temporarily through the COVID-19 pandemic and received positive feedback from customers and partner organizations. Additionally, the Company did not experience any budget

pressures on its Operation HELP fund by increasing the income eligibility limit.

- b. PPL Electric has one of the largest fuel funds and aims to support its customers to the best of its ability. The Company believes that increasing the income guidelines provides a greater opportunity to do so.

See Attachment PA PUC 1-48 for the number and amounts of grants issued annually by energy type and income tier between 2018 and 2021.

<b>2018</b>		
<b>Income Level and Energy Type</b>	<b>Total Operation HELP Funds</b>	<b>Customer Count</b>
<b>Less than 75%</b>	<b>\$362,017.42</b>	<b>1030</b>
Coal	\$138.68	1
Electric	\$314,411.08	886
Gas	\$4,354.29	18
Oil	\$40,917.94	118
Propane	\$2,195.43	7
<b>76-100%</b>	<b>\$126,730.41</b>	<b>355</b>
Coal	\$855.00	2
Electric	\$94,462.27	260
Gas	\$1,266.35	4
Kerosene	\$754.90	2
Oil	\$27,050.38	80
Propane	\$2,341.51	7
<b>101-125%</b>	<b>\$95,185.58</b>	<b>268</b>
Electric	\$75,778.71	210
Gas	\$1,116.30	4
Kerosene	\$723.85	2
Oil	\$17,170.41	50
Propane	\$396.31	2
<b>126-150%</b>	<b>\$81,670.50</b>	<b>235</b>
Electric	\$68,478.70	194
Gas	\$1,420.42	5
Kerosene	\$267.90	1
Oil	\$10,687.04	31
Propane	\$816.44	4
<b>151-175%</b>	<b>\$129,740.29</b>	<b>350</b>
Coal	\$740.00	2
Electric	\$119,404.17	318
Gas	\$438.06	2
Oil	\$8,567.50	26
Propane	\$590.56	2
<b>176-200%</b>	<b>\$83,302.77</b>	<b>227</b>
Electric	\$80,962.36	220
Gas	\$539.50	2
Oil	\$1,800.91	5
<b>201-250%</b>	<b>\$1,961.00</b>	<b>5</b>
Electric	\$1,961.00	5

<b>Grand Total</b>	<b>\$880,607.97</b>	<b>2470</b>
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<b>2019</b>		
<b>Income Level and Energy Type</b>	<b>Total Operation HELP Funds</b>	<b>Customer Count</b>
<b>Less than 75%</b>	<b>\$287,425.68</b>	<b>771</b>
Coal	\$350.00	1
Electric	\$247,634.56	654
Gas	\$4,992.21	16
Kerosene	\$419.85	1
Oil	\$32,848.07	95
Propane	\$1,180.99	4
<b>76-100%</b>	<b>\$112,730.79</b>	<b>328</b>
Coal	\$758.76	2
Electric	\$81,566.92	233
Gas	\$1,788.63	5
Kerosene	\$1,157.58	3
Oil	\$26,307.39	82
Propane	\$1,151.51	3
<b>101-125%</b>	<b>\$90,857.69</b>	<b>242</b>
Coal	\$269.90	1
Electric	\$62,085.95	156
Gas	\$1,584.85	6
Kerosene	\$359.35	1
Oil	\$25,595.28	74
Propane	\$962.36	3
<b>126-150%</b>	<b>\$77,178.86</b>	<b>206</b>
Electric	\$59,643.38	156
Gas	\$1,336.30	3
Kerosene	\$869.01	2
Oil	\$14,691.84	43
Propane	\$638.33	2
<b>151-175%</b>	<b>\$135,704.95</b>	<b>346</b>
Coal	\$325.32	2
Electric	\$121,263.02	306
Gas	\$1,121.10	3
Kerosene	\$494.85	1
Oil	\$11,606.03	31
Propane	\$894.63	3
<b>176-200%</b>	<b>\$100,758.26</b>	<b>260</b>

Electric	\$94,948.48	245
Gas	\$676.00	2
Kerosene	\$624.76	1
Oil	\$4,509.02	12
<b>201-50%</b>	<b>\$5,900.00</b>	<b>13</b>
Electric	\$5,150.00	12
Gas	\$750.00	1
<b>&gt;250%</b>	<b>\$300.00</b>	<b>1</b>
Electric	\$300.00	1
<b>Grand Total</b>	<b>\$810,856.23</b>	<b>2167</b>

<b>2020</b>		
<b>Income Level and Energy Type</b>	<b>Total Operation HELP Funds</b>	<b>Customer Count</b>
<b>Less than 75%</b>	<b>205,709.35</b>	<b>428</b>
Coal	2,074.00	6
Electric	169,824.92	301
Kerosene	298.35	1
Oil	31,947.48	115
Propane	1,564.60	5
<b>76-100%</b>	<b>83,166.48</b>	<b>193</b>
Coal	2,002.00	5
Electric	58,373.27	107
Kerosene	293.85	1
Oil	20,912.53	75
Propane	1,584.83	5
<b>101-125%</b>	<b>63,734.38</b>	<b>158</b>
Electric	39,408.92	74
Kerosene	1,104.19	3
Oil	21,970.10	76
Propane	1,251.17	5
<b>126-150%</b>	<b>66,186.53</b>	<b>152</b>
Coal	740.00	2
Electric	45,775.01	89
Gas	750.00	1
Kerosene	380.85	1
Oil	17,601.22	56
Propane	939.45	3
<b>151-175%</b>	<b>366,592.47</b>	<b>638</b>
Electric	356,091.86	607

Oil	10,209.39	30
Propane	291.22	1
<b>176-200%</b>	<b>264,942.09</b>	<b>463</b>
Electric	258,385.88	442
Gas	528.00	1
Oil	4,820.11	17
Propane	1,208.10	3
<b>201-50%</b>	<b>212,897.48</b>	<b>364</b>
Electric	211,782.97	361
Oil	1,114.51	3
<b>Grand Total</b>	<b>1,263,228.78</b>	<b>2396</b>

<b>2021</b>		
<b>Income Level and Energy Type</b>	<b>Total Operation HELP Funds</b>	<b>Customer Count</b>
<b>Less than 75%</b>	<b>\$270,088.03</b>	<b>435</b>
Coal	\$670.00	2
Electric	\$243,558.87	362
Gas	\$1,559.06	3
Oil	\$23,254.65	65
Propane	\$1,045.45	3
<b>76-100%</b>	<b>\$96,207.28</b>	<b>162</b>
Coal	\$550.00	1
Electric	\$82,417.42	121
Oil	\$12,874.56	39
Propane	\$365.30	1
<b>101-125%</b>	<b>\$93,328.07</b>	<b>162</b>
Coal	\$400.00	1
Electric	\$79,095.91	124
Gas	\$905.32	2
Kerosene	\$509.85	1
Oil	\$11,869.04	32
Propane	\$547.95	2
<b>126-150%</b>	<b>\$61,226.84</b>	<b>104</b>
Coal	\$435.00	1
Electric	\$50,218.61	73
Oil	\$9,778.43	27
Propane	\$794.80	3
<b>151-175%</b>	<b>\$417,165.81</b>	<b>706</b>
Electric	\$410,854.97	690

Oil	\$5,979.89	15
Propane	\$330.95	1
<b>176-200%</b>	<b>\$323,148.22</b>	<b>539</b>
Electric	\$319,347.89	529
Oil	\$3,800.33	10
<b>201-250%</b>	<b>\$326,256.49</b>	<b>539</b>
Electric	\$323,519.88	531
Oil	\$2,736.61	8
<b>Grand Total</b>	<b>\$1,587,420.74</b>	<b>2647</b>

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Q. PA PUC 1-49. Provide the projected annual number of customers that may receive energy-savings kits and/or energy education from 2023 through 2027.

A. PA PUC 1-49. PPL Electric estimates about 50 customers per year, on average, may receive an energy-saving kit and/or energy education during the plan period.

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Q. PA PUC 1-50. Clarify what internal OnTrack costs are incurred, projected annual internal costs from 2023 through 2027 (broken out by type), and whether these costs are recovered through its universal service rider.

A. PA PUC 1-50. Pursuant to the Company's Commission-approved tariff, PPL Electric's Universal Service Rider ("USR") recovers "the costs, except internal administrative costs (i.e., employee wages and benefits), associated with universal service programs provided by the Company to residential customers." Supp. No. 330 to Electric Pa. P.U.C. No. 201, Twentieth Revised Page No. 18. As such, PPL Electric does not recover wage and salary expenses through the Universal Service Rider ("USR"). Rather, those expenses are recovered through base rates. However, other internal OnTrack costs are recovered through the USR, such as employee expense items and IT system changes. Typically these costs have been small, and PPL Electric does not budget internal administration costs separately.

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- Q. PA PUC 1-51. Provide an explanation and any analysis related to the cost of serving OnTrack customers from 2023 through 2027 and how its annual program expenditure amounts were determined. The cost projections must be broken down by cost component (*i.e.*, administration, CAP credits, and arrearage forgiveness).
- A. PA PUC 1-51. Please see PPL Electric's response to 1-1 and 1-4.

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- Q. PA PUC 1-52. The PA PUC is not currently requiring any clarifications to this aspect of the Proposed 2023 USECP (relating to Use of Community-Based Organizations), but we do note that PPL has committed to respond to the questions raised in PA-CLEEC's May 26 filing.
- A. PA PUC 1-52. To clarify, PPL Electric did not "commit[]" to respond to the questions raised in PA-CLEEC's May 26 filing." As stated in the Company's Response to Follow-Up Comments of PA-CLEEC, "the Company reserve[d] all rights to respond to the substance of the PA CLEEC Comments at such time as when the Commission requests all stakeholders to comment on the 2023-2027 USECP." Notwithstanding, as with all other Comments, PPL Electric will review and respond to them to the extent, if any, that the Company deems necessary.

**PPL Electric Utilities Corporation**  
**Universal Service**  
**And**  
**Energy Conservation Plan (USECP)**  
**2023-2027**

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Appendix A – Organizational Chart and Role Responsibilities

Appendix B – Community-Based Organizations

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## **I. INTRODUCTION**

PPL Electric Utilities Corporation’s (“PPL Electric” or the “Company”) 2023-2027 Universal Service and Energy Conservation Plan (“USECP” or “Plan”) was prepared consistent with the Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) requirements, including Sections 54.71 through 54.78 of the Commission’s regulations. See 52 Pa. Code §§ 54.71-54.78.

The 2023-2027 USECP builds upon the successes and lessons learned through previous iterations of the Company’s USECP. As with past versions of the USECP, the 2023-2027 USECP is designed to achieve the Commission’s goals: (1) protecting customers’ health and safety by helping low-income customers maintain electric service; (2) providing for affordable electric service by making payment assistance available to low-income customers; (3) assisting low-income customers so that they can conserve energy and reduce residential utility bills; and (4) establishing universal service and energy conservation programs (“Universal Service Programs” or “USPs”) that are operated in a cost-effective and efficient manner. 52 Pa. Code § 54.73(b).

PPL Electric’s 2023-2027 USECP consists of four Universal Service Programs, which are designed to achieve the Commission’s goals. The programs are:

1. OnTrack – PPL Electric’s Customer Assistance Program (“CAP”);
2. WRAP – PPL Electric’s Low-Income Usage Reduction Program (“LIURP”);
3. Operation HELP – PPL Electric’s Hardship Fund; and
4. Customer Assistance and Referral Evaluation Service (“CARES”) – PPL Electric’s Special Referral Service for Customers with Temporary Hardships.

Additional details on these programs are set forth in Section II, *infra*.

## **II. PROGRAM DESCRIPTIONS**

### **A. ONTRACK**

#### **1. Overview and Background**

OnTrack is a special payment program for low-income households at or below 150 percent of the Federal Poverty Income Guidelines (“FPIG”) who have trouble paying the full cost of their electric bill. OnTrack is PPL Electric’s CAP and is one of its Universal Service Programs. OnTrack, which started as a pilot in 1993, is funded by residential customers and administered by partner organizations.

The primary customer benefits of OnTrack include:

- A reduced fixed payment amount based on a percent of income
- Arrearage forgiveness over the program period
- Protection against shutoff of electric service
- Referrals to other programs and services

PPL Electric uses the Remote Entity Portal System (“REP” or “System”) to establish a 12-month debt forgiveness timetable for all new OnTrack enrollees. The customer’s outstanding balance amount is reviewed at the time of enrollment, and the overdue amount is frozen. The outstanding balance is forgiven in a straight-line method. Equal installments are forgiven over the 12-month period. The debt forgiveness installments are shown on the customer’s statement of account and in the Company’s Customer Service System (“CSS”) as arrearage forgiveness credits.

The 12-month forgiveness timetable provides benefits to customers and the Company. From customers’ perspectives, they can see significant progress every month as the debt owed to PPL Electric is reduced. This helps motivate customers to continue making on-time payments and managing their usage to remain in the program and ultimately see the pre-program arrears amount (*i.e.*, overdue balance) reduced to zero. The Company benefits by receiving recovery of receivables and ultimately lower overdue receivables.

In July 1992, the Commission adopted a Policy Statement that established guidelines for CAPs. The Commission encouraged all electric and gas utilities to implement CAP pilots. After receiving approval from the Commission for its pilot proposal, PPL Electric implemented OnTrack in December 1993. The pilot began in one region and expanded to all regions by June 1994. The Company agreed to enroll 2,000 low-income customers in OnTrack. PPL Electric stopped the pilot program on July 31, 1995.

On December 3, 1996, Governor Tom Ridge signed a law that increased competition in the electric utility industry. The new law gave consumers the

opportunity to choose their electric generation supplier. The legislation required electric distribution companies to continue their various assistance programs (e.g., CARES, Operation HELP, OnTrack and WRAP).

As a result of its August 12, 1998, Restructuring Settlement Agreement with all interested parties, PPL Electric agreed to expand OnTrack expenditures significantly from 1999 through 2002. During this four-year period, the program’s annual budget increased from \$5.875 million in 1999 to \$11.7 million in 2002. OnTrack expenditures over the past five years have been as follows:

<b>Program Year</b>	<b>OnTrack Expenditures</b>
2017	\$80.9 Million
2018	\$80 Million
2019	\$82 Million
2020	\$77.5 Million
2021	\$85.5 Million

## **2. Objectives**

PPL Electric has structured and implemented OnTrack to address the needs of low-income customers while balancing financial, regulatory, and social interests.

The four primary operating objectives of the OnTrack program are to:

1. Improve customers’ bill payment habits and attitudes;
2. Stabilize or reduce customers’ energy usage;
3. Eliminate overdue balances for program participants; and
4. Provide the customer with other beneficial services and/or programs through a network of partner organizations.

## **3. Program Design**

The OnTrack program is designed to establish a 12-month payment plan that complies with the CAP Policy Statement<sup>1</sup> and maintains compliance with the specific parameters of the program.

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<sup>1</sup> 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Docket No. M-2019-3012599.

OnTrack’s payment plan design is based around three payment options: (1) the Percent of Income (“PIP”) option; (2) the Agency Selected Payment (“ASP”) option; and (3) the Minimum Payment option. For each OnTrack participant, PPL Electric evaluates whether the PIP option or the ASP option will offer the best solution for the customer’s situation. These payment options are addressed in more detail below.

**a. Percent of Income (PIP) and Agency Selected Payment (ASP) Options**

During the review process a Percent of Income (“PIP”) is calculated for each OnTrack applicant. An Agency Selected Payment (“ASP”) option is available for situations where the PIP option does not offer the best solution for the customer’s situation.

The table below shows the percent amounts that are used when the system calculates the PIP option.

Income Level (Percent of FPIG)	Electric Heat	Non-Electric Heat
50% or Below	5%	2%
51 to 100%	6%	3.5%
101 to 150%	7%	4%

PPL Electric calculates the Total Energy Burden Payment Amount (“TEBPA”) under the PIP by multiplying the monthly income by the applicable percent of income percentage factor (see table above).

Below is an example calculation of the OnTrack installment amount using the PIP option.

**PIP Option Example**

Household Size	2
Monthly income	\$950
Electrically heated home	Yes
Percent of Income factor	6%
Total Energy Burden Payment Amount	\$57.00
Components of TEBPA:	
CAP Plus Amount	\$7.00
OnTrack Installment Amount	\$50.00

As noted previously, the ASP option is used when the PIP option does not offer the best solution for the customer’s situation. The ASP option considers extenuating circumstances that may be present within the customer’s

household, financial situation, or both. Specifically, this option will be considered if using the PIP calculation will set the OnTrack installment to an amount greater than the average bill. The ASP option is determined by the partner organization choosing a payment amount that fits the specific customer needs.

**b. CAP Plus**

The CAP Plus payment amount stems from the Company’s 2010 distribution rate case settlement (Docket No. R-2010-2161694). The purpose of CAP Plus is to help offset program expenses for all residential customers who pay for OnTrack through the reconcilable Universal Service Rider (“USR”). The Company determines the CAP Plus amount by taking the total amount of Low-Income Home Energy Assistance Program (“LIHEAP”) funding received by OnTrack participants, dividing that dollar amount by the number of active OnTrack accounts as of September 30, and then dividing that annual amount by 12 months.

PPL Electric includes the CAP Plus payment amount in the installment amounts determined under both the PIP and ASP options. However, OnTrack customers who have a credit balance due to a LIHEAP grant are exempt from the CAP Plus payment amount until they have exhausted their credit balance. However, the TEBPA will not change, and there will not be a specific designation of CAP Plus while the customer has a LIHEAP credit.

**c. Additional Conditions on Installment Amount**

The following are other conditions that apply to the determination of a customer’s OnTrack installment amount:

1. Regardless of whether the PIP option or the ASP option is selected for the customer, the review process will not allow a payment amount to be lower than the minimum payment control feature of \$40 for electric heat customers or \$20 for non-electric heat customers.
2. A customer reporting zero income will participate in the program at the minimum payment amount of \$40 for electric heat customers or \$20 for non-electric heat customers.
3. If the customer exceeds the maximum CAP credit amount, the customer will be automatically transitioned to OnTrack Budget Billing (“OTBB”) status. The OTBB standing in the program is still beneficial because the customer receives debt forgiveness and

OnTrack credits (if applicable), but the customer's fixed monthly payment amount is increased from their normal OnTrack amount to their budget billing amount.

4. When an OnTrack customer moves from one residence to another, their OnTrack amount will be recalculated at the new address.
5. PPL Electric uses an alert process to identify a participant who has a TEBPA that is greater than the average bill. The account will be reviewed, and the Company may adjust the customer's TEBPA.

5.6. OnTrack customers are exempt from late fees.

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#### **4. Program Eligibility**

OnTrack offers qualified customers payments that are less than their current bills, arrearage forgiveness, and a chance for a fresh start with PPL Electric. In addition, the Company coordinates referrals with other low-income assistance programs, such as WRAP, Operation HELP, LIHEAP, as well as other programs administered by the partner organizations that administer OnTrack.

##### **a. Eligibility Criteria**

PPL Electric designed OnTrack specifically for low-income customers with household income at or below 150 percent of the FPIG who are unable to pay their electric service bills in full. Eligibility criteria for OnTrack include:

1. The household must be at or below 150 percent FPIG.
2. The household must submit a proof of income evidencing that they have a source of income or, alternatively, must submit the zero-income form explaining their income situation. The Company will evaluate zero income claims by following the below listed guidelines. Additionally, the Company has the discretion to make exceptions to the guidelines for households based on specific circumstances.
3. The OnTrack application requires the customer to specify income, even if the income is unearned. Unearned income can come in the form of government assistance (temporary or long-term), public assistance grants, money from friends or relatives, and other one-time lump-sum payments. Additional examples include: (1)

Temporary Assistance for Needy Families (TANF); (2) Diversion Program; (3) State Blind Pension Program; (4) Refugee Cash Assistance Program; and (5) State Supplementary Payments. Support payments that are actually paid to the household can be included if verified and documented as such. When a customer's only source of income is unearned income of this type, a self-declaration statement needs to be submitted with the OnTrack application. This self-declaration statement does not need to be notarized. This statement allows the Company to verify how the customer is paying for basic living needs, such as food, shelter, personal items, etc.

4. The customer applying cannot own or be listed on multiple properties or multiple PPL Electric accounts. Exceptions can be granted for specific scenarios such as a property with a separate meter for a garage or a property with multiple meters.
5. The customer must permanently reside in PPL Electric's service territory. If PPL Electric or the partner organization finds the customer is not a full-time occupant of the property, the OnTrack application will be rejected.
6. The customer's account must be in an individual customer's name.
7. The customer's account must be billed on a residential rate; non-residential rate accounts are not eligible for OnTrack.
8. The customer's account must be on default service to complete the OnTrack enrollment.
9. The customer's account is not enrolled in a Time of Use ("TOU") rate.
10. The customer must contact PPL Electric or the partner organization if there is a change in household size and/or income.
11. The customer must provide updated proof of income when requested by PPL Electric or the partner organization.
12. The customer must respond to requests for information and/or appointments associated with WRAP.<sup>2</sup>

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<sup>2</sup> If the customer is removed from OnTrack due to the failure to provide this response, the customer will be reinstated after providing such response.

13. The customer must comply with all applicable PPL Electric tariff and regulatory requirements to establish and maintain electric service.

The OnTrack application requires verification from the customer acknowledging that the customer must report changes in income and household members. The customer also must provide confirmation that all information is true and accurate to the best of their knowledge. If an application is incomplete or requires clarification, the agency reviewing the application will make a reasonable attempt to obtain the information necessary to determine eligibility or to clarify any issues which might disqualify the customer. If the customer does not respond to requests for additional information, or if PPL Electric or a partner organization finds that a customer is withholding information or did not comply with reporting all required documentation, the OnTrack application will be rejected.

#### **b. Determining and Calculating Income**

All household members of an OnTrack applicant, regardless of relationship, are considered when determining household size and income.

Pursuant to the Pennsylvania Department of Human Services' ("DHS") LIHEAP guidelines, income is the total earned and non-earned income of a household and includes the following:

1. Employee earnings: Employee earnings is money, including wages, salaries, bonuses, commissions, and tips, before taxes or other deductions that a person receives for providing services on behalf of an employer.
2. Profit from self-employment: Profit of a self-employed person is gross receipts minus costs of operating a business or farm, practicing a profession, providing day-care for children in an approved family day-care facility, or renting nonresident real property.
  - a. The following expenses are among those that are not deductible from gross receipts:
    - i. Depreciation.
    - ii. Personal business and entertainment expenses.
    - iii. Personal transportation.
    - iv. Purchase of capital equipment.
    - v. Payment on the principal of loans for capital assets or durable goods.
    - vi. Work related expenses such as federal, state, and local income taxes, contributions to retirement funds and transportation to and from work.

vii. Deposits into the self-employed person retirement account and payment for his or her life insurance.

3. Income from roomers, boarders, or apartment renters: Gross income from providing room or board, or both or from apartment rentals paid directly to a household member.

4. Unearned Income: Unearned income includes, but is not limited to, the following:

- a. Public assistance grants.
- b. Social Security benefits.
- c. Workers' compensation (or disability).
- d. Supplemental Security Income.
- e. Unemployment compensation.
- f. Support payments (child, foster care, spousal, etc.).
- g. Cash gifts and contributions.
- h. Pensions.
- i. Interest and/or dividends from investment or bank accounts.
- j. Veterans' benefits.
- k. Funds withdrawn from Individual Retirement Accounts, Certificates of Deposit, and proceeds from the sale of stock certificates.
- l. Utility Allowances paid directly to the household from the landlord or public housing agency to cover utility bills.
- m. Income from nonresident rental property managed by a rental agency or another person.
- n. Disability.
- m. Money/income received from a family member or friend. This type of income must be documented with a verification statement. The statement does not need to be notarized.
- n. Social Security Income or Social Security Disability received for a child.

5. ~~A loss from one source of income cannot be used to offset another source of income. Business operating losses from self-employment or losses associated with rental properties cannot be used to offset another source of income.~~

The OnTrack applicant's proof of income may include pay stubs from employers, pay stubs from government organizations, self-declaration statements describing money received from family or friends, bank statement showing direct deposit information, or official tax return documents. If the customer is self-employed or owns a small business, the income documentation must include a copy of the latest federal income tax return and net profit (not gross income), which will be used to determine eligibility for OnTrack. ~~Seasonal workers~~

~~will~~ Applicants have the option of providing proof of income for 30 days or 12 months, whichever is more beneficial to the household.

## 5. Enrollment and Referrals

PPL Electric has found that the primary source of potential OnTrack participants is referrals from the Company's Customer Service Representatives ("CSRs") and/or Customer Service contractors. CSRs have daily contacts with low-income, payment-troubled customers with overdue balances and routinely refer these customers to the partner organizations that administer OnTrack. During 2021, for example, CSRs generated approximately 148,000 referrals to OnTrack administering organizations.

PPL Electric developed an online application which was designed and created with the customer in mind. In addition to making applying easier for the customer, the process also shortens wait times by eliminating mailing delays with paper applications. The online application is available at: [www.pplelectric.com/OnTrack](http://www.pplelectric.com/OnTrack).

The customer navigates through an intuitive series of screens providing the information necessary to determine eligibility into the OnTrack program. The customer has the option of uploading their proof of income or mailing this information to the agency who administers the program. The online system provides the customer with the name and contact information, including email address, for the assigned partner agency. The entire website and all assistance program applications are available in Spanish.

Other sources of potential participants may include internal lists, referrals made by partner agencies, LIHEAP-based data, and information from other PPL Electric programs.

There are multiple opportunities for enrollment in OnTrack. These options include the following:

1. During the payment assistance (phone call) interaction with the contact center if the customer appears to be a good fit for the program, the system will automatically alert the CSR, and a program application will be sent to the customer. The CSR will inform the customer that a program application is on the way.
2. The customer can call PPL Electric directly at 1-800-342-5775 and request an application for the OnTrack program or apply over the phone with an agent.

3. The customer can call a partner organization and request an application for the OnTrack program.
4. The customer can walk into the partner organization and complete a program application or ask for assistance completing the application.
5. The customer can apply online at [www.pplelectric.com/OnTrack](http://www.pplelectric.com/OnTrack).

The Company will continue to evaluate new options for applying to the program and will move toward implementation when: (1) the costs are reasonable; and (2) the benefits align with improving the customer's experience.

## 6. Projected Participation and Budget

PPL Electric will continue to work with internal and external resources to identify, engage, and enroll eligible customers. PPL Electric projects the following participation and expenditures for OnTrack from 2023 through 2027. Expenditure projections include the core component costs of revenue shortfall (OnTrack credits), arrearage forgiveness, and external administration. These expenditures do not include PPL Electric's internal costs.

Program Year (as of the end of December)	Active OnTrack Households (Target/Estimate)	Projected Program Expenditures
2023	71,000	\$87,130,105
2024	73,250	\$84,581,575
2025	75,500	\$82,276,307
2026	77,700	\$86,171,777
2027	79,800	\$87,168,578

## 7. Needs Assessment

Matching the proper assistance program with each potential applicant is an overriding objective in PPL Electric's administration of the Universal Service Programs. PPL Electric personnel, as well as its partner organizations, seek to ensure that eligible residential customers have an opportunity to successfully maximize the benefits available to them via OnTrack, WRAP, Operation HELP, LIHEAP, and other related programs. Data on the Company's customer base is noted below.

Average residential customer count	1,334,000
Estimated Low Income Customer Count	337,091
Confirmed Low Income Customer Count	228,117

## **8. Quality Control/Quality Assurance**

### **a. Recertification**

The normal program timeline is 12 months. At month 11, the recertification process begins. The system reviews OnTrack accounts to determine if they qualify for automatic recertification. Accounts that qualify for automatic recertification are those that have received LIHEAP funds within the past 12 months or have SSI as the primary source of income. Accounts that meet the automatic recertification criteria will be recertified for another 12 months in the program at the same OnTrack installment amount. This automatic recertification feature will not occur two consecutive times. At month 12, accounts are reviewed again for automatic recertification. This second review is completed to identify any accounts that may have recently received a LIHEAP grant. OnTrack Budget Billing accounts are also eligible for automatic recertification if they have received LIHEAP in the last 12 months or have SSI as their primary source of income. When OTBB customers are automatically recertified, they will return into regular OnTrack at the conclusion of their 12-month program cycle.

At least 30 days before the recertification is due, a program cover letter and application are sent to customers who do not qualify for automatic recertification. The partner organization caseworker completes the recertification review for the customer and, if eligible, sets up the new OnTrack installment amount. A post enrollment letter with information about the program and the customer's payment amount is mailed or emailed to the customer. Customers remain enrolled in the program even after the pre-program arrears (overdue balance) have been forgiven.

In addition, there are special household situations where the Company will enroll a customer in OnTrack but require the customer to update their income information every six months instead of every 12 months. The Company refers to this special situation as OnTrack Lifestyle ("OTLS"). The purpose of OTLS is to address situations where customers' incomes are less than or equal to their mortgage payments or rent or they report zero income. In effect, the customers reported that they did not have enough income but somehow managed to pay their mortgage/rent and OnTrack payments. This gave rise to concerns that customers might not be reporting all sources of household income or other resources.

OTLS provides a check-up for the customer, which helps ensure that the Company is accurately documenting the customer's income situation and aligning the customer's payments with the most recent information.

Customers participating in OTLS are not eligible for automatic recertification. OTLS customers will be prompted to recertify after six months of participation. For participation beyond 12 months, customers will be required to provide additional evidence of eligibility, such as receipts, bank statements, and/or support letters, which provide an explanation as to how the customer is paying for cost-of-living expenses. The Company will not allow continued recertifications by self-declaring zero income or indicating their mortgage/rent is higher than income.

In addition, a customer may request to be removed from the OnTrack program at any time. A customer requesting to be removed from OnTrack before their 12<sup>th</sup> month cannot reenroll until after their original agreement timeline has expired.

**b. Minimum Payment Amount and Maximum CAP Credits**

The minimum payment control feature within the System will not allow a monthly payment amount to be less than \$40 for electric heat customers and \$20 for non-electric heat customers. The maximum 12-month revenue shortfall amount (also referred to as CAP credits or benefits) for electric heat customers and non-electric heat customers are shown in the table below:

FPL Tier/Level	Account Classification	Maximum Credit Amount That Could Be Used Over 12 Months
0% to 50%	Electric Heat	\$3,150
51% to 100%	Electric Heat	\$2,500
101% to 150%	Electric Heat	\$2,150
0% to 50%	Non-Electric Heat	\$1,950
51% to 100%	Non-Electric Heat	\$1,500
101% to 150%	Non-Electric Heat	\$1,250

Customers who are active in the program will have different revenue shortfall amounts each month because the actual revenue shortfall amount will be calculated by taking the actual bill amount minus the fixed OnTrack installment amount.

If a customer exceeds the maximum credit amount before the 12-month period expires, the customer will be automatically moved to OTBB program status. When this occurs, the OTBB activation letter is sent to the customer and informs the customer of this change in status. The OTBB activation letter also informs the customer that PPL Electric will automatically send a program application prior to their recertification/re-enrollment period. Recertification or

re-enrollment will be considered 12 months from the original enrollment date in OnTrack, unless the customer has SSI as their primary source of income or they have received LIHEAP in the last 12 months, in which case they will be automatically re-enrolled.

The customer will receive a letter when the pre-program arrears amount (overdue balance) is at zero. This point in time also corresponds with the recertification deadline. This letter, referred to as the *OTBB All Is Forgiven* letter, summarizes the customer's transition from traditional OnTrack to OTBB. The end of the letter states that the overdue balance has been eliminated, but PPL Electric still wants to help the customer by re-enrolling them in OnTrack at a payment amount that is lower than what they are currently paying. The customer is informed that a program application has been mailed to them.

### **c. Collections and Service Termination**

The Company designed the OnTrack program with the idea of balance in mind. PPL Electric believes the energy burden reduction needs to be balanced against the need to hold limited-income customers accountable for making on-time payments. The Company's billing system runs on a chronological billed, due, review cycle. Actual payments received are woven into this cycle to determine how to treat the account. In practice, this means the system bills the customer, waits for the due date, and then reviews the account to see if any additional actions are needed based on what was billed versus payments received. The billed amount is also shown as the Amount Due on PPL Electric's bill. Once a customer is enrolled in OnTrack, the Customer Service Billing system will expect a payment for the OnTrack installment amount, plus any missed installments when the review occurs.

If an active OnTrack customer does not catch up on their installments during the billing/collection process, the electric service may be terminated for nonpayment.

A customer will enter the collection process after one missed payment unless the missed payment is less than \$60. If the customer misses two or more payments, they will enter the collection process regardless of the amount of the missed payment. Additionally, if the customer is placed into the collection process it may lead to electric service termination during non-moratorium months. If an active OnTrack customer's service is terminated for nonpayment, the reconnection amount will be equal to the missed OnTrack installments due plus the reconnection fee. Once reconnected, the customer will resume participation through the end of their enrollment period.

The Company has messaging in place to remind customers of the benefits of paying the bill by the due date. Five (5) days before the due date, the Company's system will deliver a short reminder phone call to the customer. In addition, if the customer misses one payment, a letter is sent and informs the customer about the missed payment. This letter also discusses the collection process and having the electric service terminated.

In addition, a customer may request to be removed from the OnTrack program at any time. A customer requesting to be removed from OnTrack before their 12<sup>th</sup> month cannot reenroll until after their original agreement timeline has expired.

#### **d. Fraud and Theft of Service**

PPL Electric views theft of service as a serious public safety issue. In cases of theft of service, the customer may be placing their household in an unsafe condition.

The Company will investigate any OnTrack account where PPL Electric becomes aware of potential fraud, theft of service, or other misappropriation of funds.

When reviewing OnTrack applications for enrollment or re-certification, PPL Electric may review the application for potential fraud or misrepresentation of information (e.g., validate suspected occupants, investigate inconsistent household/demographic information provided during the application process, theft of service, "name-game", etc.).

As part of PPL Electric's standard revenue protection practices, customer information may be analyzed for potential fraud. The investigation may include a rate check, a credit reporting service to confirm a customer's debt at a location, soft credit inquiry, and a probe into how the customer pays for basic living expenses. If the investigation includes the use of credit report information, PPL Electric will provide the customer with adverse action notification in accordance with the Fair Credit Reporting Act.

Fraud includes, but is not limited to, misrepresentation of the customer's identity for the purpose of obtaining utility service or OnTrack benefits, misrepresentation of income or occupant information, tampering with PPL Electric's equipment, or otherwise obtaining service illegally. PPL Electric will follow its normal practices for investigation of fraud, theft of service, and other misappropriations of service which may result in some or all the following: back billing, removal from OnTrack and termination of service.

Once an account is removed from OnTrack for fraud, theft of service, or other misappropriations of service, the customer will not be eligible to receive OnTrack

benefits for one full year from the date of removal. Customers may also be held liable for account arrearage forgiven amounts, pre-program arrearages, bill credits, and/or related account collection and investigation fees.

## **9. Miscellaneous**

### **a. Financial Posting Order for LIHEAP Funds and OnTrack Credits**

PPL Electric is an authorized LIHEAP vendor. The Company receives and posts LIHEAP funds to customer's accounts. DHS has determined that utilities cannot use LIHEAP cash grants to offset the costs of OnTrack credits (i.e., the difference between actual bills and OnTrack payments). PPL Electric posts LIHEAP credits in accordance with the LIHEAP vendor agreement. At the time of this filing the financial posting order for LIHEAP cash or crisis grants is as follows:

- Missed OnTrack payments
- Current OnTrack bill due
- Payment of future OnTrack bills

If DHS makes changes to future vendor agreements, PPL Electric will follow compliance with program guidelines.

### **b. Overpayments**

The Company's billing system runs on a chronological billed, due, review cycle. The system bills the customer, waits for the due date, and then reviews the account to see if any additional actions are needed based on the payments received. If the customer makes the scheduled payments, the account balance continues to reduce through arrearage forgiveness credits. In cases where the payments exceed the balance of the account, the system is designed to create an OnTrack Overpayment ("OTOP") excess credit. The OTOP credit is created when current or accumulated balance overpayments for an active OnTrack customer cause the account balance to be reduced to less than \$0. Example: A customer has an OnTrack installment amount of \$100, and the account balance is \$55. The customer pays \$100. The system will create an OTOP credit of \$45 (\$100 - \$55). This \$45 OTOP credit will be applied to the future Pay This Amount (scheduled payment), as shown on the customer's bill.

**c. Shopping for Electric Generation Supply**

PPL Electric found that customers who were enrolled in OnTrack and shopping were paying rates higher than non-shopping customers and exhausting their OnTrack credits more quickly. This has a negative impact on the shopping OnTrack customers who are not able to maximize their OnTrack benefit, and other customers who are funding OnTrack through the USR. PPL Electric received approval in its Default Service Plan V to require customers to terminate their shopping contract prior to being accepted into the OnTrack program.

Customers who apply for OnTrack and have an energy supplier go through the traditional application and income review process. If the customer is eligible for the program, the enrollment is approved in a pending status. The customer is mailed a letter advising of their approval and alerting the customer to proceed with the enrollment they need to return to default service. On day 7, if the customer has not returned to default service and has provided the Company with an email address, a reminder communication is sent. On day 15, if the customer has not returned to default service, the application is rejected, and a rejection letter is mailed. Customers may reapply once they have returned to default service.

**d. Resource Plan**

PPL Electric uses a combination of internal resources, contractors, and partner agencies to manage and deliver the OnTrack program. A list of partner agencies is set forth in Appendix B.

**e. Summary of Differences Between Current Plan (2017-2019) and Proposed Plan (2023-2027)**

The table below provides a description of the key program design changes.

ID #	Category	Current Plan (2017-2022)	Proposed Plan (2023-2027)
1	Program Design	18 Month Program	12 Month Program
2	Program Design	Percent of bill payment structure: 0-50% = 50% 51%-100% = 70% 101%-150% = 80%	Change primary payment option from Percent of Bill to Percent of Income plan. The percent of income amounts are based on the application of the new energy burden thresholds:

		<p>5% - non-heating (0-50% FPIG)</p> <p>6% - non-heating (51%-100% FPIG)</p> <p>7% - non-heating (101%-150% FPIG)</p> <p>13% - heating (0-50% FPIG)</p> <p>16% - heating (51%-100% FPIG)</p> <p>17% - heating (101%-150% FPIG)</p>	<p>2% -non-heating (0-50% FPIG)</p> <p>3.5% -non-heating (51%-100% FPIG)</p> <p>4% -non-heating (101%-150% FPIG)</p> <p>5% - heating (0-50% FPIG)</p> <p>6% - heating (51%-100% FPIG)</p> <p>7% - heating (101-150% FPIG)</p>
3	Program Design	<p>Minimum Payment Amount</p> <p>\$12.00 – non-heating</p> <p>\$30.00 – heating</p>	<p>Minimum OnTrack Amount</p> <p>\$20.00 – non-heating</p> <p>\$40.00 – heating</p>
4	Program Design	<p>Customers with arrearages had a \$5.00 monthly arrearage co-payment included in their OnTrack installment</p>	<p>Eliminated the \$5.00 arrearage co-payment</p>
5	Program Design		<p>OnTrack payment reviews are completed to confirm the customer does not have a payment amount that is greater than the average bill.</p>
6	Program Eligibility		<p>Eligibility criteria includes:</p> <ul style="list-style-type: none"> <li>• Time of Use customers are not eligible</li> <li>• OnTrack applicants confirmed eligible for enrollment must return to Default Service if they have a Supplier</li> </ul>
7	Quality Control – Quality Assurance	<p>18-month program with an automatic recertification for customers that have received LIHEAP funds withing the past 16 months or have Supplemental Security Income</p>	<p>Change program timeline to a 12-month program. Recertification guidelines are:</p> <p>6 months for OTLS</p> <p>One automatic recertification for customers who have</p>

		(SSI) as the primary source of income.	received LIHEAP with in the past 12 months or have Supplemental Security Income (SSI) as the primary source of income.
8	Quality Control – Quality Assurance	<p>Electric Heat:  0%-50% = \$4,027  51%-100% = \$3,661  101%-150% = \$3,328</p> <p>Non-electric Heat:  0%-50% = \$1,585  51%-100% \$1,441  101%-150% = \$1,310</p>	<p>Maximum OnTrack credit amounts are updated as follows:</p> <p>Electric Heat:  0%-50% = \$3,150  51%-100% = \$2,500  101%-150% = \$2,150</p> <p>Non-electric Heat:  0%-50% = \$1,950  51%-100% \$1,500  101%-150% = \$1,250</p>
9	Default Design	If a customer missed two or more installments, they were removed for non-payment (also referred to as defaulted).	A customer no longer defaults after missing two or more installments, instead the customer will be in Active Collections for their missed OnTrack installments.
10	Control Features	There is no specific language in the plan to address the handling of concerns relating to inaccurate, incomplete, or fraudulent applicants.	Update information regarding fraud protocols.

## **B. WRAP**

### **1. Overview and Background**

PPL Electric's WRAP is the name of the Company's LIURP. WRAP helps customers reduce their electric bills and improve comfort for income eligible customers. The program is funded through the USR. Contractors conduct energy surveys or "audits," install weatherization measures, and provide energy education to the participating customers. The Company also uses contractors to conduct quality assurance inspections of completed work.

The WRAP services and measures installed by contractors depend on the customer's use of electricity, the results of an energy audit, and any coordination between other weatherization programs. PPL Electric encourages customers to participate as "partners" in the audit and energy education session(s) so that they can maximize their savings' success.

### **2. Objectives**

The primary objectives of WRAP are to:

1. Reduce the energy usage and electric bills of income eligible customers; and
2. Increase the ability to pay and decrease the arrearages of income eligible customers.

Secondary objectives include:

1. Improve comfort for income eligible customers;
2. Promote safer living conditions through the reduction of secondary heating devices;
3. Maintain/establish partnerships with local contractors and organizations to promote maximum and timely assistance; and
4. Make tailored referrals to Company and other assistance programs, such as OnTrack, LIHEAP, Act 129 programs, and other weatherization programs.

### **3. Program Design**

#### **a. Energy Survey**

PPL Electric uses the energy survey or “audit” to identify what measures and services the contractor will install in the customer’s home. Decisions made during the audit are based on:

- Customer interview/occupant practices
- Electric usage history
- Site-specific diagnosis
- Prioritization of measures
- PUC payback criteria
- Coordination with other weatherization programs

WRAP auditors recommend measures in compliance with the priority lists contained in the *WRAP Standards and Field Guide*. The objectives of the priority lists are to:

1. Reduce customers’ electric consumption by installing WRAP measures and providing energy education;
2. Comply with PA State Weatherization Health and Safety standards; and
3. Provide all income-eligible customers in PPL Electric’s service territory with an equal opportunity to receive WRAP services and measures.

The auditor conducts an initial energy education session with the customer to itemize electric costs and to influence choices that will save energy and improve comfort and safety. The auditor conducts the initial session prior to the installation of measures, usually during the audit. The auditor will review OnTrack program benefits with the customer and explain how their energy use affects their OnTrack benefits, when applicable.

In years 2023-2027, PPL Electric will continue to require that all LIURP customers receive an initial energy education session, unless the customer received an equivalent session through Act 129 WRAP prior to the installation of LIURP measures.

WRAP contactors are required to integrate education into all aspects of WRAP. The LIURP installer should continue to reinforce educational concepts from the LIURP or Act 129 Audit.

## **b. Installation of Measures – Baseload**

All WRAP customers are eligible for baseload measures. Standard measures and services include:

- Energy education
- Installation of Light-Emitting Diode lightbulbs (“LEDs”)
- Refrigerator replacement
- Window air conditioner replacement
- Dehumidifier replacement
- Changing or cleaning of heating/cooling filters
- Dryer venting (electric dryer)
- Clothesline installation
- Power Strip/Smart Plug
- Appliance replacement, with PPL Electric approval
- Carbon monoxide detector
- Comfort measures such as a door sweep or window quilt
- Other measures that meet PUC payback criteria

## **c. Installation of Measures – Low Cost**

If the baseload customer has an electric water heater and has the potential for water heating measures, the WRAP auditor may upgrade the job to “low cost” at the time of the baseload audit (or downgrade the job during the full cost audit).

Low-cost measures include:

- Water heater replacement with a Heat Pump Water Heater (“HPWH”) or a standard domestic electric water heater
- Gravity Film Exchange
- Repair of water leaks
- Water pipe insulation
- Installation of energy/efficient showerhead(s)
- Installation of energy-efficient aerator(s)
- All baseload measures
- Other measures that meet PUC payback criteria

The Company has no expenditure limit on low-cost jobs. However, measures must meet the PUC payback criteria described in PPL Electric’s *WRAP Standards and Field Guide*. PPL Electric requires that contractors install HPWHs when the site meets the criteria for a standard replacement.

#### **d. Installation of Measures – Full Cost**

Customers with installed electric heat in 50 percent or more of the premise are eligible for a full cost audit. The WRAP auditor can upgrade a job in a home with high seasonal usage where full cost measures may reduce heating and/or cooling costs. Conversely, the auditor may downgrade a job if there is no potential to install electric heating/cooling measures or the home is beyond the scope of weatherization. PPL Electric staff makes the final determination as to the “job type” based on the measures installed.

Full cost measures include:

- Blower door testing and associated air sealing
- Attic, wall, and floor insulation
- Sealing of attic bypasses
- Attic vents and hatches
- Crawlspace and header insulation
- Heating equipment repair/retrofit/replacement, to include Ductless Heat Pump systems (mini-split systems)
- Duct insulation and repair
- Caulking and weather-stripping
- Door sweeps
- Storm windows
- Window replacement
- Thermostat replacement
- Water heating measures if the premise has an electric water heater
- Baseload measures
- Other measures that meet the PUC payback criteria

The PUC’s LIURP guidelines suggest a seven-or 12-year payback for most measures. In 2002, PPL Electric implemented an aggregate payback formula based on the customer’s electric seasonal usage. The Company assigns a “shell allowance” for each full cost job based on the payback formula. The shell allowance serves as a spending guideline for full cost measures to reduce electric usage. Examples of shell measures include insulation and air sealing.

PPL Electric plans to continue using the shell allowance as a guideline for full cost expenditures in years 2023-2027. However, the Company will allow WRAP contractors to exceed the shell allowance for “high” priority measures, such as attic insulation and associated air sealing and electric heat repair with PPL approval.

#### **e. Quality Control/Quality Assurance**

PPL Electric will target a minimum of 30 percent of all full cost jobs for a site inspection. The Company will conduct phone inspections for a minimum of 25

percent of baseload and low-cost recipients. PPL Electric may choose to inspect all jobs with new or pilot measures.

The objectives of the inspection are to:

1. Ensure that all measures and services listed in LEAP are installed in accordance with WRAP standards;
2. Identify major missed opportunities and adherence to the priority lists; and
3. Gather customer satisfaction data.

The inspector verifies the installation of invoiced measures and notes any concerns or major missed opportunities in LEAP. The contractor has 30 days in which to respond to a customer.

The quality assurance inspector offers a follow-up energy education session to customers in conjunction with a post-installation inspection or within six months after the installation of all measures. If a full cost recipient does not receive a site inspection, PPL Electric will offer follow-up education while conducting a phone inspection

PPL will continue to offer remedial energy education or a referral for additional WRAP services and measures when a customer's usage increases or remains high after the twelve-month post WRAP period.

#### **f. Incidental Repairs, Health and Safety, and Comfort Measures**

Contractors can make small incidental repairs as needed for the installation of other weatherization measures. As a general guideline, the suggested spending allowance for incidental repairs is 30 percent above the shell allowance limit. Contractors can exceed the allowance with PPL Electric approval.

Contractors can spend up to \$650 in health and safety diagnostic testing and measures for heating jobs without PPL Electric's approval. Examples of health and safety measures include dryer venting, and the installation of carbon monoxide detectors and bathroom exhaust fans. PPL Electric proposes to continue allowing a "standard" \$650 health and safety allowance in years 2023-2027. Contractors can exceed the allowance with PPL Electric's approval to address more extensive health and safety problems, such as mold or lead remediation that inhibit the installation of full cost measures.

WRAP Contractors can spend up to \$250 in “comfort” measures in conjunction with electric energy-saving measures for low cost and baseload jobs. Contractors should install comfort measures, such as window quilts, that will not impact the air changes-per-hour of the home where feasible. In situations where the contractor installs a measure that will impact air quality or combustion levels (e.g., the customer is over-income for the PA Weatherization Assistance Program), the contractor should, at a minimum, conduct a Combustion Appliance Zone (“CAZ”) test before and after the installation.

#### **4. Program Eligibility**

PPL Electric requires that customers meet the following criteria to qualify for WRAP:

1. Household income is at or below 150 percent of the FPIG. The Company will serve up to 20% of customers that are between 150% - 200% of the FPIG through its LIURP budget. This includes “special needs” customers as defined by the PUC, customers living in multi-unit projects who could best benefit from “whole building” treatments, and customers referred through inter-utility coordination.
2. The customer is at least 18 years old.
3. The premises is in PPL Electric’s service territory and has its own electric meter.
4. The customer’s home is the primary home, not a “second” or vacation home.
5. The electric service is the name of one of the household’s occupants. (Exception: home is part of a multi-unit project and service is temporarily in the landlord’s name).

~~6-7.~~ The premises did not receive LIURP WRAP or Act 129 WRAP within the past five years and has the potential to receive energy-reduction measures and services. PPL Electric’s staff will review applicants who received LIURP or Act 129 WRAP within the past five years on a case-by-case basis.

~~7-8.~~ The customer has at least nine months of usage history at the premises. (Exceptions made with Company approval).<sup>3</sup>

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<sup>3</sup> Customers that have less than nine months of usage and are below 150 percent of FPIG are eligible for Act 129 WRAP.

~~§-9.~~ The customer consumes at least 6,000 kWh annually.<sup>4</sup>

If an apartment building contains at least three units and at least 50 percent of the tenants qualify for WRAP, PPL Electric may provide weatherization measures and services to all tenants in the building. Each tenant must provide consent for WRAP.

As part of PPL Electric’s Act 129 Energy Efficiency and Conservation Plan (“Act 129 Plan”), Act 129 WRAP serves customers in multi-unit households with incomes at or below 150% of the federal poverty income guidelines. Multi-unit buildings with incomes between 150% and 200% of the federal poverty income guidelines or Act 129 recipients who could benefit from additional WRAP measures will be referred by the Act 129 conservation service provider (“CSP”). There is no minimum usage for jobs coordinated with Act 129 WRAP. A household must have an individual meter to qualify for LIURP; master-metered buildings are not eligible for LIURP WRAP.

A customer does not need to have an overdue amount with PPL Electric to qualify for WRAP. However, the Company may prioritize WRAP services in situations where a customer has high electric consumption, or the customer participates in OnTrack and is at risk for exceeding the OnTrack benefit levels. The Company currently defines “high usage” households as households that use more than 18,000 kWh per year.

The Company may deny WRAP or limit the services offered in the home when inaccurate or fraudulent information is provided in the application. Customers may be required to provide proof of income or household composition when the Company is alerted to potential fraud.

#### **a. Consent to Participate**

The Company requires customer consent prior to the start of any WRAP work. In addition to authorizing WRAP, the customer agrees to participate in the energy audit and energy education session(s).

Furthermore, both homeowners and renters are eligible for WRAP. For rental properties, PPL Electric requires that the landlord sign a consent form before a tenant receives most measures. If the landlord does not sign the consent form, the Company will offer one or more of the following to the tenant:

- Referral to Act 129 Low-Income Program, if income eligible

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<sup>4</sup> The Company can make exceptions for customers living in very small premises or hardship situations (e.g., elderly customer limits use of electric heat during the pre-treatment period). PPL Electric will refer “low usage” customers not served through LIURP to other utility programs, other weatherization programs (if not previously received), and LIHEAP Crisis when available.

- Provision of an energy-saving kit if the household income is between 150-200% of FPIG
- Phone or in-home energy education session (e.g., high usage OnTrack customer)
- Limited baseload WRAP

**b. LIURP Coordination with Act 129 WRAP**

If a customer qualifies for WRAP, PPL Electric’s Low-Income Energy Assistance Programs database system (“LEAP”) assigns a Case Number and designates the case as “LIURP” or “Act 129 WRAP” based on the current criteria as delineated in the following table.

<b>LIURP</b>	<b>Act 129 WRAP</b>
All cases between 150%-200% of the FPIG*	All Multi-unit homes
Installed electric heat (primary source)*	Non-installed electric heat (primary source) and usage is less than 18,000 kWh
Annual usage is greater than 17,999 kWh*	Less than nine months of usage at the premise under the current account**
Electric water heater 12+ years old, or mobile home with an electric water heater*	Mobile home without an electric water heater and usage is less than 18,000 kWh

\*Excludes multi-unit premises

\*\* Household income must be 150% of the FPIG or lower

Act 129 cases are assigned to an Act 129 CSP; LIURP cases are assigned to a LIURP contractor. PPL Electric’s staff can change the program type, except cases above 150% of the FPIG must remain LIURP. Act 129 customers may receive additional measures from LIURP, which are tracked separately under a different case number.

An application that does not automatically qualify goes under “review” (e.g., customer has service at multiple premises). PPL Electric staff makes the determination as to customer eligibility based on program guidelines, customer need, and the potential to receive WRAP measures.

**5. Promoting WRAP**

PPL Electric employs a variety of channels to advertise WRAP, including bill inserts and company website, so all residential customers can learn about the

program. The Company also implemented an “on-line” WRAP Application in March 2015.

The Company strongly encourages that OnTrack customers participate in WRAP. In June 2018, the Company implemented an automated process to create a WRAP application for every approved OnTrack customer with an annual kWh use of 18,000 or greater, regardless of heating source. PPL Electric plans to develop an enhanced communication plan to increase OnTrack customer participation in WRAP. Failure for an OnTrack customer to reduce or maintain electric usage or to fulfill WRAP-related requirements may result in removal from the program. PPL Electric informs OnTrack customers about the program through its *Post Enrollment OnTrack letter*, agency referrals, website, and targeted phone calls and mailings. The Company will continue to seek innovative ways to enroll OnTrack customers into WRAP and to focus on the benefits that the service provides.

In addition, the Company may use some or all of the following outreach methods to reach potentially eligible customers in years 2023-2027:

- Phone calls, text messaging, mailings, and e-mail “blasts” to electric LIHEAP recipients and customers identified as income eligible in PPL Electric’s Customer Service System (“CSS”)
- Program information on PPL Electric’s website ([www.pplelectric.com](http://www.pplelectric.com))
- Presentations and communications to PPL Electric employees, including information and updates on the Customer Services internal website
- Cross-marketing with other weatherization and utility programs
- Social media (e.g., Facebook)
- Presentations and communications to social service agencies, senior citizens groups and other organizations
- Participation in community events, PUC/Utility events, and booths at high traffic areas where customers with limited incomes can be reached
- Communications and personal contact with multi-family housing authorities, project managers, and landlords
- WRAP Contractor Referrals/Word-of-Mouth
- Low-cost print media options such as “merchandisers”
- Other, as appropriate

PPL Electric tracks the number of qualified WRAP participants and “how they heard about WRAP” through its “Low-Income Energy Assistance Programs” Database System or LEAP. The Company will continue to evaluate new outreach technologies and strategies throughout 2023-2027 and implement as cost-effective and feasible.

## 6. Projected Participation and Budget

PPL Electric's current WRAP (LIURP) budget is \$10,000,000 annually. The chart below depicts the 2023-2027 funding levels and estimated enrollment level.

Years	Yearly Enrollment Level	Yearly Expenditure
2023 – 2027	3500	\$10 Million

In addition to the estimated enrollment levels listed above, the Company may provide energy-saving kits and/or energy education for income eligible customers not eligible for WRAP measures in conjunction with the LIURP budget.

## 7. Needs Assessment

As of April 1, 2022, PPL Electric has identified approximately 85,825 customers that can benefit from WRAP. The Company projects a total cost of \$236,735,254 to serve these customers based on the methodology below. The costs are based on the 2021 average-cost-per-job for direct costs, multiplied by 1.12 (12%) for administrative and field support costs. The calculation below accounts for the average cost-per-job for direct costs differs based on the type of job. The total cost to serve figure was calculated as follows:

- Number of confirmed income eligible customers coded as residential – electric heat: 36,905
- Customers likely to receive electric heat treatments based on historical data: 32,107
- The average cost-per-job for direct cost (electric heat treatment): \$4,072

To calculate the total cost to serve residential electric heat customers, PPL Electric multiplied the number of heating customers (32,107) by the average-cost-per-job for direct costs (\$4,072) and added 12% for administrative/field support. This resulted in a total cost to serve in the amount of \$146,429,073.

- Number of confirmed low-income customers coded as residential – non-electric heat = 48,920
- Customers likely to receive water heating and/or baseload treatments, including customers with electric heat = 53,718
- The average cost-per-job for direct cost (water heating and/or baseload treatment): \$1501

To calculate the total cost to serve residential non-electric heat customers, PPL Electric multiplied the number of customers likely to receive water heating and/or baseload treatments (53,718) by the average cost-per-job for direct cost (\$1,501) and added 12% for administrative/field support. This resulted in a total cost to serve in the amount of \$90,306,181.

To complete the calculation, the total cost to serve 32,107 heating customers (\$146,429,073) and the total cost to serve 53,718 customers with water heating/baseload jobs (\$90,306,181) were added together to provide a total cost of \$236,735,254.

## **8. WRAP Contractors**

### **a. Contractor Selection and Requirements**

PPL Electric uses contractors and their representatives to install weatherization measures and conduct audits, inspections, and energy education sessions. The Company's Program Management Staff, in conjunction with a PPL Electric Supply Chain representative, select contractors from qualified and reputable weatherization agencies and local private contractors.

PPL Electric staff will select the contractors through a request for proposal process in accordance with the Company's procurement guidelines and policies.

PPL Electric assigns work to contractors based on customer need, location, skill sets, experience, and ability to handle workload. Habitual delays may result in the assignment of work to another contractor.

### **b. Contractor Performance**

PPL Electric conducts a performance review with individual WRAP contractors at least once per year. The Company evaluates contractors on their ability to complete assigned work on time, quality of their work, cost-effectiveness, and customer satisfaction. Performance metrics, as documented in LEAP, include:

- Turn-around time for job completion
- Coordination with other programs and services
- Measures installed, cost per measure installed
- Customer satisfaction

Contractors will also receive feedback as part of the annual LIURP evaluation as to their average pre-to-post WRAP savings, acquisition cost (when available) and WRAP savings' results in general.

The performance review gives contractors the opportunity to express any problems or concerns and to make suggestions for improvement.

In addition to the annual performance review, PPL Electric staff or a designated home performance specialist performs periodic field observations of auditors, crew leaders, and energy educators to include observations of new personnel.

The Company's staff may also conduct field inspections of jobs that do not require diagnostic testing.

PPL Electric may request additional meetings and/or training for contractors that do not meet WRAP requirements. If performance does not improve, the Company may terminate the WRAP contract.

### **c. Contractor Training**

PPL Electric will continue to reserve a portion of its annual field support budget for existing WRAP contractors. Training funds can be used to:

1. Sponsor and/or provide contractor sponsorships to conferences and special events (e.g., National Affordable Comfort Conference).
2. Sponsor and/or provide training that will enable contractors to receive Continuing Education Units ("CEUs") or prepare for Building Performance Institute ("BPI") Certification.
3. Sponsor and coordinate training for specialized work (e.g., combustion testing, infrared training, heat pump water heater installation, baseload measures and energy education).
4. Develop and implement training that is PPL Electric specific (e.g., OnTrack education, new pilots, or measures).
5. Sponsor webinars on new technologies, techniques, and best practices.

PPL Electric will allocate a portion of its training budget, as needed, to support the PA Quality Control Inspector ("QCI") and BPI testing and certification/recertification fees. The Company will work with the PUC, the PA Weatherization Advisory Panel, and WRAP Contractors to identify and support training needs as needed to meet state or federal home performance standards.

The Company offers a stipend to contractors who attend mandatory training that is specific to PPL Electric's LIURP to help offset productivity losses. The stipend does not apply to training at the job site.

## **9. Miscellaneous**

### **a. Inter-Utility Coordination**

PPL Electric will continue to encourage coordination with the PA Weatherization Assistance Program ("WAP"), gas utility weatherization programs, and county

weatherization programs in accordance with the budget and resources of the other programs.

In 2023-2027, PPL Electric plans to strengthen utility-coordination through the following initiatives:

1. Participate in meetings regarding program coordination.
2. Monitor contractor coordination efforts through LEAP.
3. Provide WAP contractors with WRAP Applications, upon request.
4. Screen customer lists provided by agencies for possible WRAP referral.
5. Align WRAP with PA WAP standards where it is cost-effective and feasible to do so. Continue to identify and implement training partnerships with the National Sustainable Structures Center.

#### **b. Reporting and Evaluation**

PPL Electric is required to submit the following annual reports to the PUC on or near the following dates:

1. LIURP Productivity Report – March 1
2. USRR (LIURP Section) – April 1
3. LIURP Annual Report – April 30
4. LIURP Annual Narrative Report – April 30

The reports due at the end of April are PPL Electric’s “self-evaluation” of its LIURP two years prior to the submission date. In other words, the 2023 LIURP Report will evaluate jobs completed in 2021. This allows the Company to collect 12 months of post-weatherization data.

PPL Electric is required to submit a third-party evaluation on its Universal Service Programs to the PUC every six years. Approximately 15 percent of the evaluation is dedicated to WRAP and funded through the LIURP budget. PPL Electric’s next Universal Service Program evaluation is due to the Commission in October 2026.

**c. Resource Plan**

PPL Electric uses a combination of internal resources, contractors, and partner organizations to manage and deliver WRAP. A list of partner organizations is set forth in Appendix B.

**d. Summary of Differences Between Current Plan (2017-2019) and Proposed Plan (2023-2027)**

The table below depicts the key program changes between the current plan and the proposed plan (2023-2027).

ID#	Category	Current Plan (2017-2022)	Proposed Plan (2023-2027)
1	Background	Winter Relief Assistance Program (WRAP)	Elimination of acronym – Program is name is WRAP
2	Participation Eligibility	The premise did not receive LIURP WRAP or Act 129 WRAP within the past three years.	The premise did not receive LIURP WRAP or Act 129 WRAP within the past five years.
3	Participation Eligibility	The company provides partial weatherization in situations where the major energy use is attributed to lifestyle choices, such as hot tubs, heated sunrooms, etc.	Remove
4	Participation Eligibility		The Company may deny WRAP or limit the services offered in the home when inaccurate or fraudulent information is provided in the n application. They may be asked to provide proof of income.
5	New Measure	Ductless Heat Pump pilot conducted	Add as a standard measure: Ductless Heat Pump (aka Mini-split system)
6	Evaluation	Conducted third party evaluation in 2020	Begin the selection process for the 2026 USP Evaluation as required by the PUC

## **C. OPERATION HELP**

### **1. Overview and Background**

Operation HELP is a hardship fund supported by donations from PPL Corporation, its employees, retirees, and customers. The program targets low-income customers who have overdue balances and an inability to pay the full amount of their energy bills. Income eligibility for the program is established at 250 percent or below of the FPIG.

The primary features of Operation HELP include:

- Direct financial assistance for overdue energy bills
- Protection against shutoffs
- Referrals to other programs and services

Operation HELP is available on a year-round basis throughout the Company's service territory. However, due to the demand for energy assistance, some agencies may stop taking applications for a period of time because they have exhausted their current funding. Because of ongoing donations from contributors, PPL Electric disburses funding to the partner organizations that administer Operation HELP periodically over the course of the year.

Started in March 1983, Operation HELP was one of the early utility-sponsored hardship funds in the nation. Through promotional campaigns, customers are encouraged to pledge to the program by making a one-time donation or adding a monthly donation to their electric bill. Approximately 11,000 customers give to Operation HELP via their electric bill payments. PPL Electric's customer service billing system has the flexibility to allow customers to give any amount to the program.

Employees may support Operation HELP as customers or through payroll deductions. In addition, PPL Electric encourages retirees to give in two ways: pension deductions or a one-time separate check donation.

### **2. Objectives**

The overall objectives of Operation HELP are as follows:

1. Provide financial assistance to qualified income eligible families who are having difficulty paying the full amount of their electric bills.
2. Offer financial assistance to households that are ineligible for OnTrack and the federally funded LIHEAP.
3. Administer a year-round program as funding permits.

### **3. Program Design**

To administer Operation HELP, PPL Electric works with partner organizations that have extensive experience in delivering human services. The administration of the program is a collaboration between these organizations and the Company. The primary duties include the following.

PPL Electric:

- Collect and disburse contributions to the partner organizations.
- Provide funding to support program administration.
- Process Operation HELP payments.
- Solicit donations from customers, employees, and retirees.
- Oversee the administration of the program.
- Maintain close working relationships with the partner organizations.
- Conduct procedural audits to review performance.
- Complete PUC-required reports.

Operation HELP partner organizations:

- Conduct intake and verify applicants' eligibility.
- Process Operation HELP applications.
- Send timely payments to PPL for posting.
- Refer applicants to other assistance programs.
- Establish a separate account for processing donations and disbursements.
- Maintain detailed program records and arrange for an annual financial audit of Operation HELP.

PPL Electric does not use customer, employee, or retiree donations for administrative expenses, weatherization measures, food, winter clothing, or promotional activities

### **4. Program Eligibility**

PPL Electric established the eligibility criteria in cooperation with the Operation HELP administering organizations. Customers with household incomes at or below 250 percent of the FPIG and other hardships may be eligible for assistance.

Under the Operation HELP guidelines, a customer can receive assistance once in a calendar year. However, the Company gives the partner organizations the flexibility to review referrals on a case-by-case basis if customers have compelling and extenuating circumstances.

Operation HELP applicants are not automatically eligible for assistance by virtue of their income, age, or family circumstances. The Company targets program funds for income-eligible customers who face hardships and have an inability to pay the full amount of their electric bills.

The partner organizations generally consider the following factors when determining program eligibility:

- Eligibility to receive other programs and services with larger funding and availability, such as LIHEAP and OnTrack.
- Extenuating circumstances impacting a member of the household, including, but not limited to, serious illness, injuries, loss of life, or loss of employment.
- Composition of household.
- The customer's collection status as well as their payment history, including the overdue balance and payment efforts on their PPL Electric account.

The partner organizations may consult with PPL Electric's Regulatory Program Specialist ("RPS") to discuss individual cases with extenuating circumstances and any requests for exceptions to the program guidelines.

## **5. Enrollments and Referrals**

PPL Electric has found that the primary source of potential Operation HELP recipients is referrals from the CSRs and/or Customer Service contractors. CSRs have daily contacts with low-income, payment-troubled customers with overdue balances and routinely refer these customers to the partner organizations that administer Operation HELP.

There are multiple options for a customer to apply for an Operation HELP grant. These options include the following:

1. During the payment assistance (phone call) interaction with the contact center if the customer appears to be a good fit for the program, the CSR may inform the customer about the program.
2. The customer can call PPL Electric directly at 1-800-342-5775 and request an application for the program or apply over the phone with an agent.
3. The customer can call a partner organization and request an application for the program.

4. The customer can walk-in to the partner organization and complete a program application or ask for assistance completing the application.
5. The customer can apply online at [www.pplelectric.com/OperationHELP](http://www.pplelectric.com/OperationHELP)

### **6. Projected Participation and Budget**

The donations from PPL Electric, its customers, employees, retirees, and fundraising activities determine the number of customers assisted. The Company will continue to solicit donations for the program. In addition, PPL Electric will continue its fundraising activities for Operation HELP (e.g., golf tournament). The Company’s tariff has a provision that directs all final bills with balances less than five dollars to the Operation HELP hardship fund.

Year	Enrollment Levels	Budget
2023 - 2027	2,500	\$1.3 Million

### **7. Needs Assessment**

Average residential customer count	1,334,000
Estimated Low Income Payment Troubled households below 150%	159,183
Confirmed Low Income Payment Troubled households below 150%	140,220
Estimated Low Income Payment Troubled households between 151%-250%	81,568
Confirmed Low Income Payment Troubled households between 151%-250%	27,697

Depending on factors such as overdue amount, payment arrangement history, and extenuating circumstances, the Company’s CSRs refer these customers to programs like the CAP known as OnTrack, the Company’s LIURP known as the WRAP, CARES, Operation HELP, and LIHEAP when available.

### **8. Quality Control/Quality Assurance**

The decision to give to any charitable cause involves several factors. One of the most important is the belief by contributors that the charitable organization uses their funds properly. PPL Electric requires the Operation HELP administering organizations to have a Certified Public Accounting (“CPA”) firm conduct an annual financial audit of the program. Some of the partner organizations complete their Operation HELP audit in conjunction with their annual federal and state-funded program audits.

To supplement the CPA audit, PPL Electric conducts annual procedural audits of the partner organizations that administer Operation HELP. The primary purposes of the audit include:

1. Review the partner organizations’ record keeping procedures.
2. Discuss the findings with the partner organizations and implement corrective action where necessary.
3. Monitor the partner organizations’ adherence to Operation HELP guidelines and procedures.
4. Ensure the proper expenditure of donations.

PPL Electric prepares monthly reports that monitor and track the partner organizations’ performance. The Company provides monthly feedback (e.g., electronic copy of reports) to the agencies regarding Operation HELP results. The PPL Electric management team also conducts meetings throughout the year with the partner organizations to discuss progress and special situations.

The Company uses its outside auditor to review internal procedures and records regarding Operation HELP. The audit includes, among other things, a review of record-keeping procedures and a reconciliation of donations from a sampling of customers.

**9. Miscellaneous**

**a. Summary of Differences Between Current Plan (2017-2019) and Proposed Plan (2023-2027)**

PPL Electric has consistently administered Operation HELP according to long-established guidelines and procedures. The table below provides a description of the key program design changes.

ID#	Category	Current Plan (2017-2022)	Proposed Plan (2023-2027)
1	Program Eligibility	Income eligible if at or below 200% of FPIG	Income eligible if at or below 250% of FPIG
2	Program Eligibility	Grants are approved for other energy vendors.	Limit the use of Operation HELP to grants for the customer’s PPL Electric bill.

## **D. CARES**

### **1. Overview and Background**

The CARES program is a special referral service for customers with temporary hardships, such as illness, injury, loss of job, or high medical bills. The program recognizes that people are sometimes victims of circumstances beyond their control. These conditions create hardships that are difficult to address without some type of assistance. CARES plays a role in responding to customers who have special circumstances.

The primary features of CARES include:

- Protection against shutoff of electric service.
- Referrals to other programs and services.
- Possible financial assistance for overdue electric bills.

The program is available to residential customers, regardless of income level, who face a temporary hardship that could result in the loss of electric service. The Company refers low-income customers with longer-term problems to OnTrack, which offers reduced payment amounts, arrearage forgiveness, and referrals to other assistance programs.

PPL Electric started CARES as a six-month pilot program in 1980-81. The Company conducted the pilot in three areas: Lancaster, Harrisburg, and Hazleton. Following an evaluation of the pilot, the Company implemented CARES as a system-wide program in February 1982. PPL Electric maintains effective working relationships with a variety of partner organizations and supports outreach efforts for LIHEAP in the partner organizations' operating areas.

### **2. Objectives**

The primary objectives of the CARES program are to:

1. Help customers who are experiencing temporary hardships to prevent termination of service and to manage their overdue electric bills by providing them with information and resources;
2. Make referrals to Company and/or community assistance programs; and
3. Act as an internal advocate for residential payment-troubled customers.

### **3. Program Design**

#### **a. Referrals and Assistance Coordination**

PPL Electric's support staff communicates directly with CARES customers. They analyze customer accounts and circumstances to determine the basic cause(s) of their bill-payment problems. They may refer customers to appropriate programs and services offered by various agencies or PPL Electric.

#### **b. Networking**

Another key responsibility of the PPL Electric management team is to maintain working relationships with partner organizations and departments within PPL Electric, such as the Customer Contact Center, Field Operations, and Revenue Assurance, to ensure awareness of the program.

#### **c. CARES Credits**

A unique feature of PPL Electric's CARES program is a provision for CARES Credits. The CARES recipient receives these credits to help pay electric bills. There are circumstances where neither PPL Electric nor social service agencies can provide sufficient and/or timely assistance to customers. Programs may have closed (e.g., LIHEAP) or the customer is ineligible for services because their household income is above program guidelines.

The typical annual CARES Credit budget is \$54,000, which comes from PPL Electric's annual donation to Operation HELP. No formal guidelines exist for the use of CARES Credits because PPL Electric applies the funds on a case-by-case basis. The Company's program management staff often use the credits for customers confronted with high medical bills or the death of the primary wage earner. In 2021, 73 customers received assistance through CARES Credits. The average grant was approximately \$538 during this period.

### **4. Program Eligibility**

Referrals to the CARES program originate from PPL Electric's Customer Contact Center ("CCC") CSRs, social agency caseworkers, and self-referrals. PPL Electric established referral criteria for CCC employees and partner organization caseworkers to use as a screening device to ensure appropriate referrals to CARES services. In practice, the CCC's CSRs refer most customers to the program.

CSRs and partner organization caseworkers refer customers to CARES when any one of the following conditions exist:

- Illness, injury, or high medical bills
- Previously good-paying customers with temporary hardship situation

- Recent loss of job or major reduction in household income
- Death of primary wage earner
- Confused and disoriented customer

The above referral criteria do not address every customer situation or hardship. The CCC representatives and partner organization caseworkers use their judgment and discretion in referring customers to CARES who may not precisely match the referral criteria. If unusual conditions exist, the support staff consults with the program manager to discuss the situation.

### 5. Projected Participation and Budget

PPL Electric bases the projected enrollment levels on its historical experience with CARES. In 2021, for example, there were 263 customer referrals to the program. Of this total, 73 customers had CARES Credits applied to their account. The Company projects that the number of CARES referrals will likely remain at around 400 annually. PPL Electric now refers many low-income, payment-troubled customers to OnTrack, which is a special payment program, instead of CARES. Because OnTrack offers a longer-term solution, it may be a better alternative than CARES.

The projected enrollment levels will remain flat, estimated at 400 each year from 2023-2027.

The annual expenditure for CARES in 2023 is approximately \$114,000: \$60,000 for staff who support the program and \$54,000 for CARES Credits. There is no specific operating and maintenance budget for CARES. PPL Electric estimates that the time spent by PPL Electric staff in support of the program is valued at \$60,000 annually. These expenses are not recovered through the USR. As noted earlier, the Company uses the remaining \$54,000 of CARES Credits to assist customers who need help and have run out of options.

The projected budget amounts shown below for 2023 through 2027 will remain relatively flat. The annual increases represented below are due to increases in staff wages and overhead costs.

Year	Total Funding Level <sup>5</sup>
2023	\$114,000
2024	\$117,420
2025	\$120,943

<sup>5</sup> The slight annual increase is due to salary expenses.

2026	\$124,570
2027	\$128,308

## 6. Needs Assessment

The program is available to any residential customer regardless of income. However, CARES bases eligibility on customers’ individual needs and concerns, and targets households with temporary hardships. PPL Electric believes that CARES will continue to serve the needs of a specific segment of residential customers.

## 7. Miscellaneous

### a. Resource Plan

PPL Electric uses a combination of internal resources, contractors, and partner agencies to manage and deliver CARES. A list of partner organizations is set forth in Appendix B.

### b. Summary of Differences Between Current Plan (2017-2019) and Proposed Plan (2023-2027)

PPL Electric has consistently administered CARES according to long-established guidelines and procedures. There are no major changes proposed in the current Plan (2023-2027) as compared to the prior Plan (2017-2019).

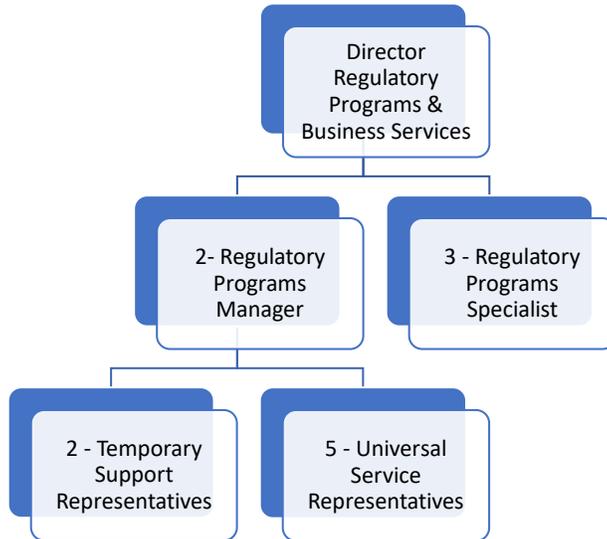
## III. STAKEHOLDER ENGAGEMENT

PPL Electric has established a Universal Service Stakeholder Group (“USSG”) that meets at least twice per year. The intent of the USSG is to improve PPL Electric’s Universal Service Programs through sharing information and inviting feedback. The USSG also reviews consumer education material and customer outreach plans. The USSG provides a forum to discuss all four of PPL Electric’s universal service programs and coordination with the Act 129 program.

## IV. USE OF COMMUNITY-BASED ORGANIZATIONS

PPL Electric utilizes several community-based organizations (“CBOs) to administer OnTrack, WRAP, CARES, and Operation HELP. The partner organizations that are CBOs are identified in Appendix B. The Company maintains a close working relationship with its network of CBOs, which guide customers to the most appropriate assistance program.

## Appendix A – Organizational Chart and Role Responsibilities



<b>Director Regulatory Programs/Business Services</b>	Responsible for all Universal Service Programs, including regulatory requirements, strategic planning, and department management.
<b>Regulatory Programs Managers</b>	Responsible for the design and implementation of the Universal Service programs including program strategy, communications, and resource management.
<b>Regulatory Programs Specialists</b>	Responsible for management support, auditing, quality assurance, and primary contact for partner organizations and contractors.
<b>Universal Service Representatives</b>	Support daily/weekly account level work associated with Universal Service Programs.
<b>Temporary Support Representatives</b>	Support daily/weekly account level work associated with programs such as LIHEAP, ERAP, and PAHAF <sup>6</sup> .
<b>Partner Organizations and Contractors</b>	Implementation of programs including approving program participation and installation of measures.

<sup>6</sup> Low Income Home Energy Assistance Program, Emergency Rental Assistance Program, and the Pennsylvania Homeowners Assistance Fund.

**Appendix B – Partner Organizations**

**OnTrack and Operation HELP**

<b>Organization Name</b>	<b>Phone Number</b>
*Catholic Charities, Diocese of Allentown 900 S Woodward St. Allentown, PA 18103 cc-ontrack@allentowndiocese.org	610.435.1541
*Commission on Economic Opportunity 165 Amber Lane, PO Box 1127 Wilkes-Barre, PA 18702 CEO@ceopeoplehelpingpeople.org	570.826.0510
*Community Action Partnership of Lancaster County 601 S. Queen St Lancaster, PA 17603 OnTrack@caplanc.org	717.299.7301 ext. 3108
*Schuylkill Community Action 225 N Centre St Pottsville, PA 17901 Or 105 W Broad St, Rear, Suite 100 Tamaqua, PA 18252 casemangers@schuylkillcommunityaction.com	570.622.1995 570.668.1038
*STEP, Inc. 2138 Lincoln St Williamsport, PA 17701 utilitiesycoming@stepcorp.org	570.327.5485
*Tri-County Community Action 1514 Derry Street Harrisburg, PA 17104 pplontrack@cactricounty.org	717.232.9757
*Union-Snyder Community Action Agency 713 Bridge Street, Suite 10 Selinsgrove, PA 17870 info@union-snydercaa.org	570.374.0181

**WRAP**

<b>Organization Name</b>	<b>Phone Number</b>
*CEO 32-34 West Union Street Kingston, PA 18704 Kingston@ceopeoplehelpingpeople.org	570.331.4709
CLEARresult 124 Rose Street Scotrun, PA 18355 poconoweatherization@clearesult.com	855.570.4712
Custom Weatherization, LLC 1855 Weaversville Rd Allentown, PA 18109 info@TruEnergySaver.com	610.861.5290
Green Kite, Inc 902 S Center St POB 579 Gratz, PA 17030 cases@greenkite.co	717.230.1616
MT Weatherization 2301 Academy Drive Harrisburg, PA 17112 Info@TennyGroup.com	717.525.9665
K2 Weatherization 401 East Louthier Street Carlisle, PA 17013 kretzingenergy@gmail.com	717.448.4382
True Management, LLC 431 Clearfield Street Freemansburg, PA 18017 info@truemanagementllc.com	484.866.8011

\* Indicates a partner organization that is a Community Based Organization

## Appendix C

### Consumer Education and Outreach Plan

PPL Electric uses a comprehensive approach to its Consumer Education and Outreach Plan (“CEOP”), which educates customers on available programs through a variety of channels and methods. The Company’s goal is to connect customers with the programs that will benefit them the most. Marketing and communication efforts are intended to increase eligible customer enrollments and the quantity of grant dollars received from government and PPL Electric programs, and to expand awareness of available assistance.

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The following outlines the plan to continue existing initiatives and incorporate new communication and marketing efforts in the future CEOP.

Existing CEOP: PPL Electric will continue marketing and communication initiatives that have proven successful in reaching its goals, including targeted outreach to customers via print communications, email, website marketing, text, phone and social media.

Newly implemented CEOP: PPL Electric will continue initiatives that were implemented since the last USECP last filing, including frequent targeted outreach to customers eligible for LIHEAP via email, text message, and printed applications, while increasing the frequency of targeted communications for all program promotions. The Company plans to increase awareness, by holding recurring program education sessions with customer facing employees to maintain and grow program participation.

Future CEOP: PPL Electric will incorporate new communication methods to expand program enrollment and awareness through increased use of short videos to explain program benefits and text messages to promote program applications.

Here are communication tactics to be used in the future. Specific frequency, targeting and message will be adapted to the current environment and program needs.

<u>Communication</u>	<u>Audience</u>	<u>Frequency</u>
<u>Organic bill help social media posts</u>	<u>All followers</u>	<u>Weekly</u>
<u>Article in print or digital newsletter</u>	<u>All residential customers</u>	<u>Monthly</u>

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<a href="#">OnTrack enrollment emails with a link to an explainer video</a>	<a href="#">Customers recently enrolled in our OnTrack program</a>	<a href="#">Monthly</a>
<a href="#">LIHEAP emails</a>	<a href="#">All eligible customers</a>	<a href="#">Bimonthly, during season</a>
<a href="#">LIHEAP UFT emails and text messages</a>	<a href="#">Customers who received a cash grant and are eligible for a crisis grant</a>	<a href="#">Weekly or Biweekly, during season</a>
<a href="#">OnTrack recertification blaster calls</a>	<a href="#">Customers eligible to recertify</a>	<a href="#">Biweekly</a>
<a href="#">Targeted program emails (all programs or one-specific)</a>	<a href="#">Eligible customers</a>	<a href="#">Bimonthly</a>
<a href="#">Bill help content on homepage of pplelectric.com</a>	<a href="#">All web visitors</a>	<a href="#">Bimonthly</a>
<a href="#">OnTrack emails</a>	<a href="#">Customers who received LIHEAP and are automatically eligible for OnTrack</a>	<a href="#">Biannually</a>
<a href="#">LIURP/WRAP emails</a>	<a href="#">Customers participating in other low-income programs, including LIHEAP, that meet eligibility criteria</a>	<a href="#">Biannually</a>
<a href="#">Bill help/general program emails</a>	<a href="#">All residential customers</a>	<a href="#">Biannually</a>
<a href="#">Bill help/general program news release, media pitch</a>	<a href="#">Media and stakeholders</a>	<a href="#">As needed, at least annually</a>
<a href="#">Paid social media advertising</a>	<a href="#">All followers</a>	<a href="#">As needed, at least annually</a>
<a href="#">WRAP postcards, mailed by contractors</a>	<a href="#">Customers who were approved for WRAP, but</a>	<a href="#">As needed</a>

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	<u>have not yet scheduled their energy assessment</u>	
<u>WRAP booklet provided by contractors</u>	<u>Customers who have completed their energy assessment</u>	<u>As needed</u>
<u>LIURP/WRAP Mass Media Marketing</u>	<u>Segments within service area identified low in leads</u>	<u>As needed</u>
<u>LIURP/WRAP informational videos</u>	<u>Customers interested or enrolled in WRAP</u>	<u>Ongoing (once developed)</u>

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The Company provides information to customers in Spanish, such as the website, program application and selected outreach material. The Company also has a language line that allows customers calling PPL Electric directly to speak with a Customer Service Representative in their preferred language via a translation service. The Company determines the language offerings based on the needs of its service territory. Specifically, Spanish is identified as the predominant language used for the Company's customer service call translations.

## VERIFICATION

I, YVETTE BELFORT, being the Manager – Regulatory Programs/Business Services at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation 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: 08/03/2022

*Yvette Belfort*  
Yvette Belfort (Aug 3, 2022 09:53 EDT)

Yvette Belfort