



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

IN REPLY, PLEASE
REFER TO OUR FILES
M-2018-3005795

August 9, 2022

To: All Parties of Record at Docket No. M-2018-3005975, PECO Energy Company Universal Service and Energy Conservation Plan for 2019-2024 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4

RE: Compliance Issue with PECO Energy Company Revised 2019-2024 USECP, Docket No. M-2018-3005795

Overview

On June 16, 2022, the Pennsylvania Public Utility Commission (Commission) entered an Order (June 16 Order) directing PECO Energy Company (PECO) to, *inter alia*, submit a revised 2019-2024 Universal Service and Energy Conservation Plan (2019 USECP) within 30 days reflecting changes consistent with that June 16 Order. The Commission approved the 2019 USECP conditioned upon PECO incorporating the changes directed in the June 16 Order.

On July 1, 2022, PECO filed a Petition (July 2022 Petition) requesting that the Commission grant an extension until December 16, 2022, to implement three changes that were approved or directed in the June 16 Order. On August 4, 2022, the Commission entered an Order granting the extension (August 4 Order).

On July 18, 2022, PECO filed clean and redlined versions of its revised 2019 USECP (July 18 Compliance Filing).¹ The July 18 Compliance Filing includes the implementation timeframe proposed in the July 2022 Petition and subsequently approved in the August 4 Order. To date, no protests or other responsive pleadings have been filed relative to the July 18 Compliance Filing.

As directed by the Commission in the June 16 Order, the Commission's Bureau of Consumer Services (BCS) has reviewed the July 18 Compliance Filing. BCS has identified one area where the revised 2019 USECP is inconsistent with the June 16 Order and is now directing PECO to file and serve a further revised 2019 USECP. Except as noted herein, BCS finds that PECO has included appropriate provisions relative to the June 16 Order in its July 18 Compliance Filing.

Needs Assessment Non-Compliance

In the June 16 Order, the Commission directed PECO to include updated needs assessment information in its revised 2019 USECP. June 16 Order at 93, OP #5(q).

¹ Unless otherwise specified, all references to the July 18 Compliance Filing refer to the clean version of the revised 2019 USECP.

The July 18 Compliance Filing needs assessment includes updated data for *estimated residential customers at 150% FPIG* and *estimated residential customers at 200% FPIG*. July 18 Compliance Filing at 2. However, the needs assessment did not include updated data for the number of confirmed low-income customers, the number of confirmed low-income payment troubled customers, the number of customers eligible for LIURP, or the projected cost to serve all customers eligible for LIURP.

The issue noted above must be addressed in a further revised 2019 USECP or addendum.

Conclusion

Accordingly, within 20 days, PECO is directed to file and serve a further revised 2019 USECP or addendum that addresses the issue related to its need assessment. PECO may submit its further revised 2019 USECP or addendum to BCS for an informal compliance review prior to filing. Parties have the right to seek reconsideration of this staff action. These determinations relative to the July 18 Compliance Filing will be deemed to be the final action of the Commission unless reconsideration of the directives in this Secretarial Letter is sought from the Commission within 20 days after service of this Secretarial Letter. *See* 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

If you have any questions, please contact Joseph Magee in the Commission's Bureau of Consumer Services at jmagee@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

cc: Joseph Magee, BCS, jmagee@pa.gov
Louise Fink Smith, Law Bureau, finksmith@pa.gov
Gladys Brown Dutrieuille, Chairman
John F. Coleman, Jr., Vice Chairman
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