



October 5, 2022

VIA ELECTRONIC FILING

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

Re: Joint Petition for Approval of Settlement, Docket No. M-2021-3014286

Dear Secretary Chiavetta,

Please find enclosed the Comments of POWER Interfaith. As indicated by the Certificate of Service, service on the parties to the above-referenced proceeding was accomplished by email. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Senior Attorney

Earthjustice

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Counsel for POWER Interfaith

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement**

Docket No. M-2021-3014286

v.

PECO Energy Company

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the enclosed document upon the persons listed below, in the manner specified, in accordance with the requirements of 52 Pa.

Code § 1.54.

VIA ELECTRONIC MAIL

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Dated: October 5, 2022

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission,
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PECO Energy Company

**COMMENTS OF
POWER INTERFAITH**

October 5, 2022



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Pennsylvania Public Utility Commission
Attn: Rosemary Chiavetta, Secretary
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Joint Petition for Approval of Settlement, Docket No. M-2021-3014286

Dear Secretary Chiavetta:

POWER Interfaith (“POWER”) appreciates the opportunity, per the August 25, 2022 Opinion and Order of the Pennsylvania Public Utility Commission (“Commission”),¹ to comment on the Joint Petition for Approval of Settlement (“Joint Petition”) submitted by the Commission's Bureau of Investigation and Enforcement (“I&E”) and PECO Energy Company (“PECO”) on January 7, 2022.² As the Opinion and Order reflects, the Joint Petition concerns a proposed resolution of I&E’s informal investigation into improper electricity shut-offs of almost 50,000 PECO customers.³

POWER is a racial and economic justice organizing force in the state of Pennsylvania, helping people put faith and values into strategic action to win concrete change in the public sphere. POWER organizes in southeastern Pennsylvania and in coalitions across the state for racial and economic justice on a livable planet by shifting the moral and policy universe towards possibilities that support the common good.

¹ Commission, Opinion and Order, Docket No. M-2021-3014286 (Aug. 25, 2022).

² Joint Petition, Docket No. M-2021-3014286 (Jan. 7, 2022).

³ Commission, Opinion and Order, Docket No. M-2021-3014286, at 1 (Aug. 25, 2022).

As I&E recognized in the Joint Petition, “service terminations can prove both traumatic and problematic for the affected customers.”⁴ Many of POWER’s members have experienced energy insecurity, and have struggled to keep up with their PECO bills. A utility shut-off can have catastrophic consequences, including impacts on the ability to retain housing, maintain custody of children, assure proper functioning of medical devices, and more. Furthermore, these consequences typically fall on low-income households that are already in difficult circumstances and are least likely to have the resources to deal with the problems.

PECO’s improper termination of almost 50,000 of its customers, as described in the Joint Petition, is part of a larger, longer-term problem. PECO must do more, and be more proactive, to support customers at risk of utility service termination and connect them with the resources to avoid it. In short, more preventative work is needed.

A critical element that such proactive preventative work must include is direct engagement with customer stakeholders to identify best practices for avoiding shut-offs. POWER requests that PECO reach out to POWER to schedule a stakeholder meeting to discuss methods for avoiding shut-offs and facilitating swifter reconnections.

Finally, more transparency is also needed, because access to information is essential for obtaining the best results from stakeholder engagement. The Terms of the Settlement include “revisions to [PECO’s] operating procedures” that “will act as safeguards against future issues involving service terminations” and the Joint Petition provides a bulleted list summarizing past actions PECO has performed to address the problems that formed the subject of I&E’s informal investigation.⁵

⁴ Joint Petition, Docket No. M-2021-3014286, Appendix B, at 2 (Jan. 7, 2022).

⁵ Joint Petition, Docket No. M-2021-3014286, Appendix B, at 5–6 (Jan. 7, 2022).

However, since it is the applicable “operating procedures” that are at the very heart of preventing incidents like those from recurring, PECO should be required to file on this docket a complete copy of the pertinent operating procedures, with the revisions that PECO has committed to implement as part of the Terms of the Settlement marked in redline, so that there is transparency for the public on what changes have been made and what the current procedures are.

PECO’s Statement in Support of the Joint Petition also refers to PECO’s agreement to “summarize and report the results of its regulatory noticing audits to BCS for the next two years.”⁶ These reports should also be made publicly available and filed on this docket, so that stakeholder engagement on these issues can be as informed as possible.

We thank the Commission for its attention to these important issues. The proposed measures we describe here will help avoid the recurrence of problems similar to those described in the Joint Petition in the future.

October 5, 2022

Sincerely,

/s/ Charmaine Butler

Charmaine Butler

POWER Climate Justice and Jobs

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/s/ Wendy Greenspan

Wendy Greenspan

POWER Climate Justice and Jobs

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⁶ Joint Petition, Docket No. M-2021-3014286, Appendix C, at 5 (Jan. 7, 2022).