



October 6, 2022

VIA E-FILE

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

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

Dear Secretary Chiavetta:

Attached for filing, please find the **Reply Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)**.

As indicated by the attached Certificate of Service, service on the parties was by email only.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Berman".

Lauren N. Berman, Esq.
Counsel for CAUSE-PA

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Reply Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE VIA EMAIL ONLY

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Date: October 6, 2022

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation Universal : Docket No. M-2022-3031727
Service and Energy Conservation Plan for :
2023-2027 Submitted in Compliance with :
52 Pa. Code 54.74 :

**REPLY COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its attorneys at the Pennsylvania Utility Law Project, submits the following Reply Comments pursuant to the July 14, 2022 Order (July 14 Order or Order), which invited interested parties to submit comments and reply comments to the PPL Electric's (PPL or the Company) Universal Service and Energy Conservation Plan for 2023 - 2027 (Proposed 2023 USECP).

On September 22, 2022, CAUSE-PA, the Office of Consumer Advocate (OCA), the Pennsylvania Coalition of Local Energy Efficiency Contractors, Inc., (PA-CLEEC), the Pennsylvania Weatherization Task Force (PWPTF), and the Commission on Economic Opportunity (CEO), each submitted initial Comments in response to PPL's Proposed 2023 USECP and the issues identified in the Commission's Order. On October 3, 2022, CAUSE-PA submitted Revised Comments, clarifying and amending our position related to PPL's proposed energy burdens set forth in our Initial Comments.

CAUSE-PA submits the following Reply Comments for the Commission's consideration in response to the initial Comments of the other parties. For the sake of brevity, CAUSE-PA will not reiterate arguments raised in initial Comments but incorporates those arguments by reference. To the extent that any argument raised in any other parties' initial Comments is not addressed, this does not indicate CAUSE-PA's agreement.

II. REPLY COMMENTS

- a. CAUSE-PA continues to support swift implementation of PPL's proposed 12-month PPA forgiveness cycle.*

In response to PPL's proposal to reduce its OnTrack program cycle and arrearage forgiveness timeframe from 18 months to 12 months, OCA recommends that the arrearage

forgiveness timeframe instead be increased to 24 months. (Proposed 2023 USECP at 2, OCA Comments at 16). OCA cited cost savings as the rationale for this recommendation. (Id.)

CAUSE-PA does not agree with OCA's recommendation to extend the period of arrearage forgiveness for OnTrack participants to 24 months. CAUSE-PA is concerned that increasing the period of arrearage forgiveness will reduce the ability of OnTrack participants to achieve full arrearage forgiveness and may ultimately harm the success of the program. Data from PPL's January 2020 APPRISE report suggest that the percent of customers who are able to receive arrearage forgiveness diminishes over time.¹ Extending the arrearage forgiveness timeframe may result in diminishing numbers of OnTrack participants who are able to receive arrearage forgiveness and ultimately retire their pre-program arrears. This may in turn result in increased termination rates amongst OnTrack participants and increased collections costs borne by PPL's ratepayers.

Lengthening the period of arrearage forgiveness would also be punitive to existing OnTrack participants, who reasonably and rightfully expect to have their debt forgiven after having paid for, at most, the length of time they were provided upon entering OnTrack. Further, as the Commission explained in its CAP Policy Statement, a shorter arrearage forgiveness timeframe -- which more quickly reduces pre-program arrearage balances -- likely helps to improve payment behavior by CAP customers over time.²

Ultimately, increasing the timeframe for arrearage forgiveness may harm the success of the program, undermining efforts to provide low income customers with a reasonable method of

¹ APPRISE Evaluation at 103-104, Table VIII-5 (January 2020), available at: <https://www.puc.pa.gov/pcdocs/1656535.pdf>. (2020 APPRISE Report)

² 2019 Amendments to CAP Policy Statement, Final Policy Statement and Order, Docket No. M-2019-3012599 (order entered Nov. 5, 2019), at 44 (hereinafter Final CAP Policy Statement and Order). (Final CAP Policy Statement and Order)

collections. A lengthening of the timeframe for arrearage forgiveness should not be based on programmatic costs alone and requires a more in-depth analysis into the impact that such an adjustment would have on payment coverage rates and on the ability of consumers to reasonably achieve arrearage forgiveness over a longer period of time.

CAUSE-PA reaffirms its strong support of PPL's proposal to reduce its OnTrack program cycle and arrearage forgiveness timeframe from 18 months to 12 months. Transitioning to a 12-month forgiveness period will allow customers to retire their arrears in a reasonable period of time and will help OnTrack participants stay connected to services – thus reducing uncollectible expenses.

We additionally recommend that PPL be required to track and report on data related to implementation of the 12-month arrearage forgiveness program to further assess the impact of this program change. Specifically, we recommend that PPL track (1) the average percentage and dollar amount of arrearage forgiveness by OnTrack participants; (2) the percentage of OnTrack participants who ultimately earn full arrearage forgiveness; and (3) for OnTrack participants who do not achieve full arrearage forgiveness, the average number of months in which arrearage forgiveness was earned. We recommend that this data should be reported to PPL's Universal Service Advisory Committee (USAC) on, at least, a biannual basis.

b. CAUSE-PA recommends additional review of WRAP funding levels.

PPL proposed to maintain its current WRAP budget of \$10 million per year throughout the course of its 2023-2027 USECP. Notably, this budget level was set in 2015. (Proposed 2023 USECP at 29).

CAUSE-PA noted in its initial Comments that PPL's proposed WRAP budget was not adequate and did not account for the increasing costs of materials and labor to provide necessary

energy efficiency and weatherization measures. (CAUSE-PA Revised Comments at 65). OCA, PA-CLEEC, PWPTF, and CEO similarly noted in their respective Comments that there is a clear need for PPL's WRAP budget to be increased to meet the needs of WRAP customers. (OCA Comments at 29-30, PWPTF Comments at 2, PA-CLEEC Comments at 3, CEO Comments at 3). OCA recommended a two-year review process including a stakeholder comment period to more accurately determine appropriate WRAP funding levels. (OCA Comments at 30-31).

CAUSE-PA reaffirms its position that additional funding for PPL's WRAP is necessary and would improve the capacity of WRAP to reach low income customers. (CAUSE-PA Revised Comments at 65). Further data is needed to determine the precise additional funding needed to adequately address the needs of PPL's eligible WRAP customers. We recommend that the issues of additional WRAP funding be referred to the Office of Administrative Law Judge (OALJ) for an on-the-record proceeding so that an in-depth investigation related to the need for additional WRAP funding can be conducted. An on-the-record proceeding would also more expediently allow PPL to assess the need for additional WRAP funding and address the vast unmet need for WRAP services amongst PPL's low income customers. (CAUSE-PA Revised Comments at 65).

III. CONCLUSION

CAUSE-PA thanks the Commission for its thoughtful consideration of the issues raised above and in CAUSE-PA's revised initial Comments. We urge the Commission to act in accordance with CAUSE-PA's Comments and Reply Comments to ensure that all customers – regardless of income – are able to access safe, affordable service within PPL's service territory.

Respectfully Submitted,
Pennsylvania Utility Law Project



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