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via Electronic Filing

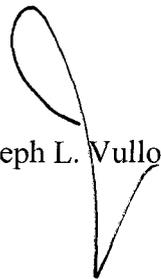
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Please accept for filing the Joint Reply Comments of the Commission on Economic Opportunity and the Pennsylvania Weatherization Providers Task Force to PPL's Proposed Universal Service and Energy Conservation Plan for 2023-2027. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,


Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**JOINT REPLY COMMENTS OF THE COMMISSION ON ECONOMIC OPPORTUNITY
AND THE PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE TO
PPL'S PROPOSED UNIVERSAL SERVICE AND ENERGY CONSERVATION PLAN
FOR 2023-2027**

I. Introduction

These joint reply comments are submitted on behalf of the Commission on Economic Opportunity (CEO) and the Pennsylvania Weatherization Providers Task Force (Task Force) to address the need for further proceedings in regard to WRAP funding and the process by which PPL contracts with third parties in the administration of its universal service programs.

II. Reply Comments

A. LIURP Funding

As indicated in the comments filed by CEO and the Task Force, PPL proposes \$10 million annual LIURP funding for its Winter Relief Assistance Program (WRAP) for the years 2023 through 2027. That funding level, \$10 million annually, has remained the same since 2015 and if the WRAP funding proposed by PPL in its Plan is accepted WRAP funding will remain the same for more than a decade.

Other parties in this proceeding have recommended the initiation of a process outside of this proceeding to determine the appropriate level of WRAP funding contending that a process of comments and reply comments do not provide sufficient information or opportunity for analysis to determine the need for additional LIURP services and funding level necessary to meet that need.

In its comments, PA-CLEEC recommends that the Commission open a rate investigation to address the appropriate level of WRAP funding. In its Reply Comments, CAUSE-PA recommends that the question of additional WRAP funding be referred to the Office of Administrative Law Judge (OALJ) for an on-the-record proceeding. Although both CEO and the Task Force in their comments recommended specific levels of WRAP funding, they concur in CAUSE-PA's recommendation that the appropriate level of WRAP funding be referred to the Office of Administrative Law Judge (OALJ) for an on-the-record proceeding.

B. Use of Community Based Organizations

As indicated in our comments, the Company's current Plan differs substantially from its prior plan in the use of community-based organizations in its WRAP. In its USECP for the years 2017-2019 (M-2016-2554787), the Company used at least seven community-based organizations (CBOs) in its WRAP program. In its current Plan, the Company proposes to use just one CBO in WRAP, CEO. The Company's recent RFP process for WRAP contractors provided no preference for CBOs and presumably was based solely on price.

CEO and the Task Force agree with PA-CLEEC's contention that the RFP process, and the contract process itself, was and is not transparent. We also share the concern of CAUSE-PA in the substantial reduction in the use of CBOs, particularly in the WRAP program.

PPL was invited by the Commission to address the contracting process in its comments and was previously provided an opportunity to shed light on its process and chose not to in each instance. Instead, PPL intentionally chose to not provide clarity at a point in the process where it would have been useful. Instead, it left any explanation of its RFP and contracting process for its reply comments, thus precluding any response from the parties, and accordingly, leaving the Commission without a means to properly address the issues around that contracting process and its effect on low-income ratepayers in the efficient delivery of needed assistance. Because of the lack of transparency in its RFP and contracting process and PPL's refusal to provide clarity at a time when it would have been open to comment from the other parties and thereby useful to the Commission, CEO and the Task Force recommend the issues surrounding PPL's contracting

process and its reduction in the use of CBOs be referred to the Office of Administrative Law Judge (OALJ) for an on-the-record proceeding.

Respectfully submitted,



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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation's :
Proposed Universal Service and Energy : Docket No. M-2022-3031727
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CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Joint Reply Comments of the Commission on Economic Opportunity and the Pennsylvania Weatherization Task Force to PPL's Proposed Universal Service and Energy Conservation Plan for 2023-2027 upon the following participants this 7th day of October, 2022, via electronic mail:

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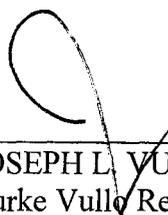
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