



March 29, 2023

To: All Parties of Record at Docket No. M-2022-3031727
PPL Electric Utilities Corporation 2023-2027 USECP

**RE: PPL Electric Utilities Corporation Revised 2023-2027 USECP
March 13, 2023 Compliance Filing**

Overview

On February 9, 2023, the Pennsylvania Public Utility Commission (Commission) entered an Order (February 2023 Order) directing PPL Electric Utilities Corporation (PPL) to, *inter alia*, submit a revised 2023-2027 Universal Service and Energy Conservation Plan (2023 USECP) within 30 days reflecting changes approved or directed in the February 2023 Order. The Commission approved the 2023 USECP conditioned upon PPL making these changes. On February 23, 2023, the Pennsylvania Coalition of Local Energy Efficiency Contractors, Inc. (PA-CLEEC) filed a Petition for Reconsideration of the February 2023 Order. On March 2, 2023, the Commission entered an Order granting reconsideration pending further review of, and consideration on, the merits of the Petition. PA-CLEEC's Petition for Reconsideration will be addressed at a later date.

On March 13, 2022, PPL filed clean and redlined versions of its revised 2023 USECP (March 13 Compliance Filing).¹ To date, no protests or other responsive pleadings have been filed relative to the March 13 Compliance Filing.

As directed by the February 2023 Order, the Commission's Bureau of Consumer Services (BCS) has reviewed the March 13 Compliance Filing. BCS has identified three areas where the revised 2023 USECP is inconsistent with the February 2023 Order. BCS has also identified areas of the March 13 Compliance Filing which include outdated or incomplete information. In all other respects, BCS finds the March 13 Compliance filing to be in compliance with the February 2023 Order.

18-Month Preprogram Arrearage Forgiveness – Non-Compliance

In the February 2023 Order, the Commission directed PPL to transition from an 18-month timeline to a 24-month timeline for pre-program arrearage forgiveness as part

¹ All references to the March 13 Compliance Filing refer to the "clean" version of revised 2023 USECP.

of its transition to a Percent of Income Payment (PIP) and a 12-month program cycle for OnTrack. The Commission further directed PPL to allow existing OnTrack customers and OnTrack customers who enroll prior to the implementation of the PIP to continue receiving arrearage forgiveness over 18 months. February 9 Order at 34, OP #7.

In its March 13 Compliance Filing, PPL states that customers with current agreements will remain on an 18-month timeline. However, PPL also states that existing OnTrack customers who recertify prior to the end of their 18-month program cycle will then be “eligible” for the new 12-month program cycle and 24-month PPA forgiveness timeframe. Additionally, PPL indicates that OnTrack Budget Billing (OTBB) customers² who do not qualify for additional credits under the new maximum limits in the 2023 USECP will get a newly recalculated enrollment in the 12-month program cycle and become “eligible” for PPA forgiveness over 24 months. March 13 Compliance Filing at 12-13.

These provisions which will result in existing OnTrack customers having their remaining PPA balances transferred from the 18-month PPA forgiveness timeframe to a new 24-month forgiveness timeframe is inconsistent with the direction specified in the February 2023 Order. This issue must be addressed in a further revised 2023 USECP.

OnTrack Final Billing – Non-Compliance

In the February 9 Order, the Commission directed PPL to clarify that it will not charge OnTrack customers more than the prorated OnTrack billing or prorated full tariff rate, whichever is less, for usage incurred during the final billing period. February 2023 Order at 60-61, OP #5(r).

In its March 13 Compliance Filing, PPL states that it will charge either the established OnTrack installment or the actual tariff rate for an OnTrack customer's final billing period, whichever is more advantageous to the customer. March 13 Compliance Filing at 19.

This provision is inconsistent with the February 2023 Order, which requires charging either the prorated OnTrack bill or actual tariff rate, whichever is less, for the final billing period. This issue must be addressed in a further revised 2023 USECP.

² OnTrack customers that exceed the maximum CAP credit amount are automatically transitioned to OTBB. OTBB allows the OnTrack customer to continue receiving pre-program arrearage forgiveness but increases the monthly OnTrack payment amount to their budget billing amount. March 13 Compliance Filing at 5.

Landlord Consent Form – Non-Compliance

In the February 9 Order, the Commission directed PPL to provide a signed copy of the WRAP³ landlord consent form to the tenant. February 2023 Order at 83-84, OP #5(aa).

In its March 13 Compliance Filing, PPL states it will provide a copy of the signed landlord consent form upon tenant request. March 13 Compliance Filing at 31.

Requiring tenants to request a copy of the landlord consent form before providing it is inconsistent with the directive in the February 2023 Order. This issue must be addressed in a further revised 2023 USECP.

Summary of Differences – Outdated or Incomplete Information

In its March 13 Compliance Filing, PPL provided a table for each universal service program titled “Summary of Differences Between Current Plan (2017-2019) and Proposed Plan (2023-2027).” The tables detail how the universal service program design has changed in its 2023 USECP as compared to its 2017-2019 USECP (2017 USECP). March 13 Compliance filing at 19-21, 38, 44, 48.

The titles of these sections are no longer accurate as the 2017 USECP is no longer the “current” plan, and the 2023 USECP is no longer the “proposed” plan. Additionally, the content of the sections does not accurately reflect all procedural or policy changes between the 2017 and 2023 USECPs after the modifications approved or directed in the February 2023 Order. PPL is directed to update the titles and contents of these sections to include the key changes consistent with the February 9 Order in a further revised 2023 USECP.

Conclusion

Accordingly, within 20 days, PPL is directed to file and serve a further revised 2023 USECP to address the issues identified above. PPL may submit its further revised 2023 USECP to BCS for an informal compliance review prior to filing. The determinations in this Secretarial Letter have been made by BCS staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. Parties may seek reconsideration of these directives by petitioning 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). The

³ WRAP is PPL's Low Income Usage Reduction Program.

Commission may also direct further changes to PPL's 2023 USECP when it addresses the merits of PA-CLEEC's Petition for Reconsideration.

If you have any questions, please contact Nathan Froehlich in the Commission's Bureau of Consumer Services at nfroehlich@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

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