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April 25, 2023

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

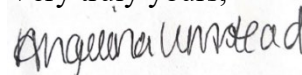
**Re: Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Years 2024 – 2028;  
Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535**

Dear Secretary Chiavetta:

Consistent with the Pennsylvania Public Utility Commission's Order Directing Supplemental Information and Establishing Comment Period entered on March 16, 2023, as modified by its Secretarial Letter issued on April 4, 2023, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the "Companies") submit the enclosed supplemental information and proposed modifications to the Companies' Amended Universal Service and Energy Conservation Plan for 2024- 2028.

Please contact me with any questions regarding this matter.

Very truly yours,



Angelina Umstead

Enclosures

c: As Per Certificate of Service  
Joseph Magee, Bureau of Consumer Services ([jimagee@pa.gov](mailto:jimagee@pa.gov))  
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Louise Fink Smith, Law Bureau ([finksmith@pa.gov](mailto:finksmith@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Universal Service and Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Years 2024-2028</b>	<b>:</b> <b>:</b> <b>:</b> <b>:</b> <b>:</b>	<b>Docket Nos. M-2022-3036532</b> <b>M-2022-3036533</b> <b>M-2022-3036534</b> <b>M-2022-3036535</b>
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

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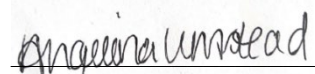
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Dated: April 25, 2023

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Universal Service and Energy</b>	<b>:</b>	
<b>Conservation Plan of Metropolitan Edison</b>	<b>:</b>	<b>Docket Nos. M-2022-3036532</b>
<b>Company, Pennsylvania Electric Company</b>	<b>:</b>	<b>M-2022-3036533</b>
<b>Pennsylvania Power Company, and West</b>	<b>:</b>	<b>M-2022-3036534</b>
<b>Penn Power Company for Years 2024-2028</b>	<b>:</b>	<b>M-2022-3036535</b>

**SUPPLEMENTAL INFORMATION OF METROPOLITAN EDISON COMPANY,  
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY,  
AND WEST PENN POWER COMPANY**

On March 16, 2023, the Pennsylvania Public Utility Commission (“Commission”) issued an Order regarding the proposed Joint Universal Service and Energy Conservation Plan (“USECP” or “Joint Plan”) of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (individually referred to as “Company” and collectively as the “Companies”). The Order requested that the Companies submit supplemental information regarding their proposed Joint Plan by April 5, 2023, as well as an amended proposed USECP, if applicable. The supplemental information filing will be followed by comment and reply comment periods open to all interested stakeholders.

The Companies requested a 20-day extension to submit the information which was granted by Secretarial Letter issued April 4, 2023, setting the deadline to submit the supplemental information to April 25, 2023.

Consistent with the Order, the Companies submit the following supplemental information regarding their proposed USECP. Additionally, an amended USECP for plan 2024-2028 is attached reflecting the proposed changes explained further herein.

**I. RESPONSES TO INFORMATION REQUESTS IN ORDER**

**1. The Companies should provide the projected average monthly PCAP bills from 2024 through 2028, broken down by income tier (i.e., 0%-50%, 51%-100%, and 101%-150%), energy type (i.e., ENH and EH), and EDC, using both the existing and the proposed PCAP models (i.e., 2019 USECP fixed credit and proposed 2014 USECP PIP).**

CAP Projected Avg Monthly Utility Bills -- 2024-2028								
Proposed PIP	Met-Ed		Penelec		Penn Power		West Penn Power	
PCAP Projected Avg Monthly Utility Bills	EH	NH	EH	NH	EH	NH	EH	NH
0-50%	\$ 57	\$ 11	\$ 57	\$ 11	\$ 56	\$ 11	\$ 55	\$ 10
51-100%	\$ 123	\$ 26	\$ 108	\$ 23	\$ 112	\$ 23	\$ 113	\$ 23
101-150%	\$ 208	\$ 42	\$ 186	\$ 39	\$ 184	\$ 37	\$ 188	\$ 39
Fixed Cr-Average Bill 2024-2028	Met-Ed		Penelec		Penn Power		West Penn Power	
PCAP Projected Avg Monthly Utility Bills	EH	NH	EH	NH	EH	NH	EH	NH
0-50%	\$ 51	\$ 16	\$ 51	\$ 16	\$ 51	\$ 16	\$ 50	\$ 16
51-100%	\$ 110	\$ 38	\$ 97	\$ 35	\$ 101	\$ 34	\$ 102	\$ 34
101-150%	\$ 187	\$ 63	\$ 167	\$ 58	\$ 166	\$ 56	\$ 169	\$ 58

The chart above includes all PCAP participants in 2022. The average bill was calculated using the participants' 2022 bills and the income-tier percentage for a PIP or fixed-credit plan. The PIP was calculated using the 2, 4, 6 or 10% of income parameters. The Fixed Credit was calculated using the current 3 or 9% of income.

**2. The Companies should provide the projected cost impact of the proposed PIP energy burdens. Each EDC should provide an estimate of how the energy burden change may impact subsidy credit expenditures from 2024 through 2028. This cost estimate should be based only on the proposed PIP energy burden change. The cost projections should be broken down by income tier (i.e., 0%-50%, 51%-100%, and 101%-150%), energy type (i.e., ENH and EH), and ED.**

<b>Proposed PIP- Estimated Subsidy with No Maximum Limit</b>					
<b>Met-Ed</b>					
<b>Heating</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
0-50%	\$ 3,255,447	\$ 3,262,322	\$ 3,269,198	\$ 3,276,073	\$ 3,282,948
51-100%	\$ 1,838,382	\$ 1,842,264	\$ 1,846,147	\$ 1,850,029	\$ 1,853,912
101-150%	\$ 822,202	\$ 823,939	\$ 825,675	\$ 827,412	\$ 829,148
<b>Non-Heating</b>					
0-50%	\$ 4,450,181	\$ 4,459,579	\$ 4,468,978	\$ 4,478,376	\$ 4,487,775
51-100%	\$ 3,969,802	\$ 3,978,186	\$ 3,986,570	\$ 3,994,954	\$ 4,003,338
101-150%	\$ 2,078,798	\$ 2,083,188	\$ 2,087,578	\$ 2,091,969	\$ 2,096,359
<b>Total</b>	<b>\$ 16,414,812</b>	<b>\$ 16,449,479</b>	<b>\$ 16,484,146</b>	<b>\$ 16,518,813</b>	<b>\$ 16,553,480</b>
<b>Penelec</b>					
<b>Heating</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
0-50%	\$ 1,948,771	\$ 1,984,722	\$ 2,021,317	\$ 2,058,664	\$ 2,096,654
51-100%	\$ 1,465,154	\$ 1,492,183	\$ 1,519,697	\$ 1,547,775	\$ 1,576,338
101-150%	\$ 507,691	\$ 517,057	\$ 526,591	\$ 536,320	\$ 546,218
<b>Non-Heating</b>					
0-50%	\$ 5,047,823	\$ 5,140,946	\$ 5,235,737	\$ 5,332,474	\$ 5,430,878
51-100%	\$ 6,310,766	\$ 6,427,188	\$ 6,545,695	\$ 6,666,635	\$ 6,789,660
101-150%	\$ 3,652,101	\$ 3,719,475	\$ 3,788,057	\$ 3,858,046	\$ 3,929,241
<b>Total</b>	<b>\$ 18,932,306</b>	<b>\$ 19,281,572</b>	<b>\$ 19,637,094</b>	<b>\$ 19,999,913</b>	<b>\$ 20,368,988</b>
<b>Penn Power</b>					
<b>Heating</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
0-50%	\$ 671,262	\$ 706,766	\$ 744,163	\$ 783,454	\$ 824,797
51-100%	\$ 550,298	\$ 579,404	\$ 610,063	\$ 642,273	\$ 676,166
101-150%	\$ 257,623	\$ 271,249	\$ 285,601	\$ 300,681	\$ 316,548
<b>Non-Heating</b>					
0-50%	\$ 1,162,319	\$ 1,223,796	\$ 1,288,551	\$ 1,356,585	\$ 1,428,171
51-100%	\$ 1,430,744	\$ 1,506,419	\$ 1,586,129	\$ 1,669,875	\$ 1,757,993
101-150%	\$ 762,105	\$ 802,414	\$ 844,873	\$ 889,481	\$ 936,418
<b>Total</b>	<b>\$ 4,834,351</b>	<b>\$ 5,090,047</b>	<b>\$ 5,359,380</b>	<b>\$ 5,642,350</b>	<b>\$ 5,940,093</b>
<b>West Penn Power</b>					
<b>Heating</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
0-50%	\$ 2,369,272	\$ 2,475,592	\$ 2,586,751	\$ 2,702,900	\$ 2,824,192
51-100%	\$ 1,714,127	\$ 1,791,047	\$ 1,871,469	\$ 1,955,501	\$ 2,043,254
101-150%	\$ 561,505	\$ 586,703	\$ 613,047	\$ 640,573	\$ 669,319
<b>Non-Heating</b>					
0-50%	\$ 4,455,652	\$ 4,655,596	\$ 4,864,642	\$ 5,083,073	\$ 5,311,174
51-100%	\$ 4,692,417	\$ 4,902,986	\$ 5,123,140	\$ 5,353,178	\$ 5,593,400
101-150%	\$ 2,357,225	\$ 2,463,003	\$ 2,573,597	\$ 2,689,156	\$ 2,809,831
<b>Total</b>	<b>\$ 16,150,199</b>	<b>\$ 16,874,927</b>	<b>\$ 17,632,644</b>	<b>\$ 18,424,382</b>	<b>\$ 19,251,169</b>
Estimated subsidy cost is based on 2022 PCAP participants that were enrolled on PCAP and billed for 12 months during 2022. The average grant per participant was applied to the projected participants for each year.					

3. The Companies should provide the annual number of PCAP customers whose usage exceeded the maximum subsidy credit limits from 2020 through 2022, broken down by income tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%), energy type (*i.e.*, ENH and EH), and utility.

PCAP Customers - Usage Exceeded Maximum Subsidy								
2020	Met-Ed		Penelec		Penn Power		West Penn Power	
Heat Type	EH	NH	EH	NH	EH	NH	EH	NH
0%-50%	15	80	9	106	6	17	13	95
51%-100%	20	216	26	407	7	70	26	248
101%-150%	9	121	7	225	1	58	10	132
2021	Met-Ed		Penelec		Penn Power		West Penn Power	
Heat Type	EH	NH	EH	NH	EH	NH	EH	NH
0%-50%	8	126	4	195	3	31	4	178
51%-100%	4	234	10	434	2	83	16	326
101%-150%	1	128	4	211	0	48	0	146
2022	Met-Ed		Penelec		Penn Power		West Penn Power	
Heat Type	EH	NH	EH	NH	EH	NH	EH	NH
0%-50%	37	91	23	107	3	14	19	71
51%-100%	37	93	31	160	5	24	32	106
101%-150%	11	57	7	92	2	19	8	46

4. The Companies should provide the projected change in annual PCAP subsidy costs from 2024 through 2028 based on the elimination of annual limits, broken down by income tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%) energy type (*i.e.*, ENH and EH), and EDC, based on both the Companies' existing and proposed PCAP models (*i.e.*, fixed credit and PIP) and energy burden target.

Please see Attachment "A".

5. The Companies should provide the CAP credit limits it would propose for each energy type if the elimination of CAP credit limits is not approved.

The Companies do not propose a subsidy maximum for the Fixed PIP PCAP program. Participants will not be on the Equal Payment Plan (budget billing). By imposing a maximum credit, customers with billing charges beyond the allowed maximum will experience fluctuating

monthly bills. Previously, for the current PCAP program, the Companies were ordered to implement budget billing with PCAP to avoid the fluctuations and customer impact.

If a maximum is required, customers' energy burdens become more than the percentage of income payment and will not be consistent with the CAP Policy Statement. Also, the Companies would propose keeping the fixed credit plan with modified subsidy maximums if a maximum is required. The following table provides the estimated subsidy levels per tier to adequately cover 80% of PCAP participants. Fixed PIP tiers were calculated using 2, 4, 6 or 10% of income per the CAP Policy Statement, and Fixed Credit was calculated using the current 3 or 9% of income.

Subsidy Maximum							
Met-Ed	PIP			Met-Ed	Fixed Credit		
	2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum		2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum
<b>Heating</b>				<b>Heating</b>			
0-50%	1561	\$3,108	\$2,972,301	0-50%	1561	\$2,678	\$2,551,512
51-100%	1644	\$1,886	\$1,562,000	51-100%	1644	\$2,010	\$1,698,719
101-150%	848	\$1,295	\$428,312	101-150%	848	\$1,469	\$513,695
<b>Non-Heating</b>				<b>Non-Heating</b>			
0-50%	2740	\$2,244	\$4,028,638	0-50%	2740	\$2,157	\$3,827,882
51-100%	3788	\$1,610	\$3,447,509	51-100%	3788	\$1,752	\$3,689,263
101-150%	2677	\$1,272	\$1,698,382	101-150%	2677	\$1,489	\$2,224,688
<b>Total</b>			\$14,137,142	<b>Total</b>			\$14,505,759
<b>Penelec</b>				<b>Penelec</b>			
	2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum		2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum
<b>Heating</b>				<b>Heating</b>			
0-50%	1068	\$2,716	\$1,708,396	0-50%	1068	\$2,463	\$1,459,475
51-100%	1519	\$1,666	\$1,222,744	51-100%	1519	\$1,743	\$1,325,380
101-150%	670	\$1,348	\$383,800	101-150%	670	\$1,447	\$431,249
<b>Non-Heating</b>				<b>Non-Heating</b>			
0-50%	3348	\$2,147	\$4,552,622	0-50%	3348	\$2,061	\$4,292,757
51-100%	6882	\$1,419	\$5,380,594	51-100%	6882	\$1,545	\$6,146,609
101-150%	4672	\$1,212	\$2,796,183	101-150%	4672	\$1,397	\$3,572,440
<b>Total</b>			\$16,044,339	<b>Total</b>			\$17,227,910
<b>Penn Power</b>				<b>Penn Power</b>			
	2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum		2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum
<b>Heating</b>				<b>Heating</b>			
0-50%	322	\$3,051	\$600,682	0-50%	322	\$2,748	\$520,141
51-100%	373	\$2,324	\$476,776	51-100%	373	\$2,412	\$500,668
101-150%	260	\$1,662	\$212,800	101-150%	260	\$1,865	\$250,259
<b>Non-Heating</b>				<b>Non-Heating</b>			
0-50%	772	\$1,903	\$1,017,932	0-50%	772	\$2,018	\$994,628
51-100%	1473	\$1,496	\$1,108,283	51-100%	1473	\$1,626	\$1,392,055
101-150%	1055	\$1,188	\$619,857	101-150%	1055	\$1,391	\$807,598
<b>Total</b>			\$4,036,329	<b>Total</b>			\$4,465,349
<b>West Penn Power</b>				<b>West Penn Power</b>			
	2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum		2024 Projected Participants	Est Max Subsidy to Cover 80%	Est Subsidy with Maximum
<b>Heating</b>				<b>Heating</b>			
0-50%	1361	\$2,474	\$2,126,313	0-50%	1361	\$2,246	\$1,815,521
51-100%	1708	\$1,673	\$1,445,150	51-100%	1708	\$1,875	\$1,622,806
101-150%	852	\$1,104	\$404,731	101-150%	852	\$1,248	\$487,410
<b>Non-Heating</b>				<b>Non-Heating</b>			
0-50%	3066	\$2,020	\$4,039,437	0-50%	3066	\$1,936	\$3,809,458
51-100%	5133	\$1,427	\$4,031,920	51-100%	5133	\$1,542	\$4,597,491
101-150%	3547	\$1,112	\$1,912,061	101-150%	3547	\$1,310	\$2,528,337
<b>Total</b>			\$13,959,613	<b>Total</b>			\$14,861,023

Estimated subsidy maximum is based on 2022 PCAP participants that were enrolled on PCAP and billed for 12 months during 2022. The offered maximum is based on the amount that would help 80% of PCAP participants achieve the percentage of income payment energy burden. The average grant per participant was applied to the projected participants for each year.

**6. The Companies should provide updated cost projections including the cost of providing PPA forgiveness over 36 months, 24 months, and 12 months from 2024 through 2028, broken down by income tier (i.e., 0%-50%, 51%-100%, and 101%-150%), energy type (i.e., ENH and EH), and EDC. If the Companies are projecting to offer additional PPA forgiveness in 2024, they are directed to identify that additional cost separately.**

Please see Attachment “B”.

**7. The Companies should provide projected impact on costs recovered from monthly ratepayer bills for each PPA time period, based on the average number of ratepayers in 2022.**

Estimated Impact to Ratepayers by Year per Avg Residential Customers						
Company	2024	2025	2026	2027	2028	
ME	\$ 21.01	\$ 12.28	\$ 9.40	\$ 8.45	\$ 8.13	
PN	\$ 23.49	\$ 13.42	\$ 10.09	\$ 9.00	\$ 8.63	
PP	\$ 17.97	\$ 9.82	\$ 7.13	\$ 6.24	\$ 5.95	
WP	\$ 18.62	\$ 11.25	\$ 8.82	\$ 8.02	\$ 7.76	

**8. The Companies should explain why current PCAP customers are not given the opportunity to transfer their PCAP accounts when they move among FirstEnergy service territory.**

When a customer moves from one location to another within the same operating company, the balance is transferred including pre-program arrears, and the PCAP program follows as long as they were still enrolled at the prior location.

When a customer moves from one location to another that is not within the same operating company, the balance cannot be transferred to the new account. PCAP is not automatically established at the new location because our system does not contain logic to evaluate all prior enrollments by operating companies to know if this was a previous participant within the new operating company. This determination impacts identifying pre-program arrears. A new

enrollment is requested. If previously submitted income documentation is still valid, income documents will not be required.

When the new enrollment is received, a system generated warning message is presented to our analysts to evaluate the account because it recognizes the last enrollment was in a different operating company. The analyst evaluates whether the customer was on PCAP previously in the new operating company, and if not, manually defers the pre-program balance as appropriate.

**9. The Companies should clarify if these customers are informed that they can apply for PCAP at their new address.**

The Companies complete outreach using many channels to encourage participation in energy assistance programs, including PCAP.

**10. The Companies should explain whether PCAP customers can submit paper PCAP applications to apply for the program. If yes, provide copy. If no, address whether prohibiting customers from applying via mail or fax limits access to the program.**

The Companies do not provide a paper application for the enrollment process. Customers can apply for PCAP by phone or online. Customers who recertify are mailed a letter and a recertification form 30 days prior to their recertification date. The Companies have not evaluated whether prohibiting customers from applying via mail or fax limits access to the program.

**11. The Companies should provide an explanation of how DEF decides which customers are selected for its text-to-recertify process and a step-by-step description of how this process works, including how DEF informs customers about the potential costs related to data rates.**

The Companies provide a list of customers that need to complete a recertification. DEF determines if the phone number on file is SMS capable. If so, DEF may initiate the Text-to-Recert

process. If not, a letter is produced that instructs the customer to contact Dollar Energy Fund. The sample script follows:

*This is Dollar Energy Fund.*

*Our records indicate that your FirstEnergy PCAP will expire on [Recert Date].*

*You can recertify over text.*

*Depending on your situation, this may take 10-15 minutes, but you will have a week to answer these questions.*

*Do you wish to continue? Reply*

*Y Yes*

*N No*

*(message/data rates may apply)*

**12. The Companies should clarify the process for identifying and verifying exemptions for customers who exceed 125% of prior annual usage.**

To identify customers that qualify for exemptions, the Companies mail a letter requesting customers to complete and mail the enclosed survey to the Companies. A postage-paid envelope was included for the customer's convenience.

**13. The Companies should confirm that only existing pre-program debt, and not debt incurred within PCAP (i.e., in-program arrears), will be deferred for all PCAP customers under the 2024 USECP.**

After the IT conversion is completed for the revised PCAP program, only existing pre-program debt, and not debt incurred within PCAP (i.e., in-program arrears), will be deferred for all PCAP customers under the 2024 USECP as long as the original amount deferred was more than \$300.

**14. The Companies should provide estimates of how much pre-program debt will be added to the PPA balance due to this one-time expansion and how this will increase annual**

**PPA forgiveness costs. Estimates should be broken down for each EDC by energy type and the number of customers impacted.**

<b>Estimated Pre-Program Debt at Conversion</b>				
	Amount	No. of Customers	Amount	No. of Customers
Company	EH		NH	
ME	\$3,380,543	5724	\$4,198,465	11463
PN	\$2,447,165	4418	\$6,288,476	18481
PP	\$717,043	1239	\$1,217,122	3893
WP	\$2,834,503	5269	\$4,796,177	14249

**Estimate is based on the open balance on March 22, 2023 for all February 2023 month-end participants.**

**15. The Companies should describe its practices and procedures regarding the refunding of security deposits.**

At enrollment, the Companies’ SAP system automatically releases the deposit requirement. Held deposits are released and applied to the account balance. This is reflected on the customer’s next billing statement.

**16. The Companies should describe its current PCAP final billing practices and explain whether the practices have changed since the Commission’s CAP Final Billing proceeding.**

The Companies’ current billing practice for issuing the PCAP final bill has not changed since the Commission entered its Staff Review of Customer Assistance Program Final Billing Methods Order (CAP Final Bill Order) on March 12, 2020.

Each month, a CAP customer is billed his or her equal payment plan (“EPP” or “budget billing”) amount minus the monthly CAP credit and the monthly arrearage forgiveness credit, if applicable. When a final bill is issued for a CAP customer, the EPP is removed from the account, which bills a true-up amount for the budget billing balance. The charges on the final bill include the customer’s actual consumption charges for the final bill period plus the EPP true-up balance

minus a full (as opposed to prorated) monthly CAP credit. If the customer is eligible to receive an arrearage forgiveness credit, the forgiveness credit is applied to the pre-program arrears balance at final billing. Past-due charges, excluding pre-program arrears, are also included in the payment due on the final bill.

An example final billing calculation follows:

\$29.40	Actual consumption charges from final billing period
+\$43.12	EPP true-up balance
<u>-\$12.00</u>	<u>Monthly CAP credit</u>
\$60.52	Asked-to-pay amount on final bill

**17. The Companies should address how its final PCAP billing practices reflect compliance with the relevant statutes and regulations as discussed in the CAP Final Billing Order.**

The final PCAP billing practice is compliant with the exception that the Companies do not prorate the CAP credit for a partial final-billing period.

**18. The Companies should provide information on how and when it adopts annual updates to the FPIG for universal service program eligibility and benefit determinations.**

The Companies adopt the annual updates to the FPIG for universal service program eligibility and benefit determinations promptly upon receiving the updates. Changes are generally implemented in early February.

**19. The Companies should Identify the number of virtual, in person, and Be Utility Wise events that the Companies will participate in for their respective service territories annually.**

The Companies anticipate attending five Be Utility Wise events to be scheduled in Harrisburg, Wilkes-Barre Scranton, Johnstown, Pittsburgh, and Erie in person. Throughout each

year, the Companies' participation in senior fairs and expos varies in number as events vary year to year.

**20. The Companies should identify whether they offer, or plan to offer, universal service program training to community agencies within its EDC service territories.**

The Companies plan to offer universal service program training to community agencies within its EDC service territories with the implementation of the revised PCAP program. Annual training is provided to agency contractors administering the WARM program. WARM training is generally provided twice per year.

**21. The Companies should identify the ways in which the proposed CEOP differs from what they are presently doing.**

Throughout the existing 2019-2023 USECP, the Companies have expanded customer outreach and outreach channels (physical and digital) to promote PCAP, LIHEAP, ERAP, HAF and DEF hardship fund. Additionally, the Companies have expanded outreach to customers for the recertification process to encourage customers to complete the process and avoid an interruption in the program benefits. The current proposal is a continuation of the Companies' commitment to educating customers about the available programs.

**22. The Companies should provide examples of consumer education letters, postcards, bill inserts, educational brochures, fact sheets, advertisements (e.g., physical and digital media), and outbound call messaging scripts.**

The Companies utilize letters, emails, bill inserts, educational brochures, doorhangers, postcards, advertisements, and social media posts among other things to encourage enrollment and expand customer outreach. Please see **Attachment "C"** for some examples.

**23. The Companies should provide more details about educational strategies for training webinars, workshops, and education events offered by the Companies via in-person, virtual, or hybrid.**

The Companies plan to offer universal service program training to community agencies within their EDC service territories with the implementation of the revised PCAP program. The Companies will establish opportunities to attend meetings and determine if the events should be virtual, in-person or both based on the known circumstances, such as weather, health and safety considerations, etc.

**24. The Companies should identify how they educate customers about household energy burdens to help customers identify how much of their household income is spent on energy.**

Each year, the Companies identify customers that have exceeded their prior year's annual consumption by 25%. These customers are provided outreach materials quarterly to help explain how behaviors and energy conservation measures can help reduce their energy burdens. For WARM participants, the energy auditor will review and discuss what the highest users are within the home, and they will discuss ways that the customer's behavior can be adjusted to reduce the electric consumption in addition to the measures that can be installed to facilitate energy savings. The customer completes a partnership and savings strategy agreement with the energy auditor.

**25. The Companies should clarify what is considered to be unreasonable consumption and identify what consumption threshold would warrant removal from PCAP post-installation of WARM measures.**

The Companies view this situation as an unusual circumstance and would not be actively looking to remove customers from the PCAP program. However, the Companies want to reserve the right to do so in instances such as illegal or fraudulent activity. The Companies would be

concerned if the increase in usage is greater than 50%. This situation may require the customer to provide proof of income before their scheduled recertification period to ensure they are still income eligible for PCAP.

**26. The Companies should clarify whether all PCAP customers are required to receive an in-home energy evaluation and work with a trained energy educator or only those who have annual electric usage of 6,500 kWh or more.**

Not all PCAP customers are required to receive an in-home energy evaluation and work with a trained energy educator. Only WARM-eligible customers, those with annual usage of 6,500 kWh or more, are required to participate.

**27. The Companies should identify how many PCAP customers have declined WRAP measures after a mandatory energy evaluation in 2021 and 2022, including the projected average energy savings from those measures. The Companies should provide justification for keeping this opt-out provision.**

In mid-2022, the Companies implemented a tracking system enhancement that allowed contractors to document when customers either refused the installation of measures or were not responsive when the contractor attempted to schedule crew work. There were 146 occurrences documented across the Companies where PCAP participants refused the installation of measures or did not respond to contractor attempts to schedule work. Approximately 1,738 WARM jobs were completed in the second half of 2022 where the customer was also a PCAP participant.

The Companies do not have a way to estimate the savings of measures that were not installed. However, in 2021, the most recent year where energy saving data is available, the average WARM participant saved 800 kWh annually by participating in WARM.

The Companies do not offer the option to opt-out but communicate the provision of only requiring an audit to encourage participation. This allows the program an opportunity to interact with the customer and educate them about the program's benefits and how we can help. The customer generally agrees to participate in the audit, and after learning of the additional benefits they can receive they will often allow the job to proceed.

Regardless of the option to refuse measures, there are customers that will allow the audit and not respond to future calls to schedule the remaining measures. Customers that would only receive the audit are still receiving energy education and some measures that can lead to savings, such as the installation of smart power strips and LED lightbulbs. Auditors may also install furnace filters, nightlights, showerheads, and faucet aerators and will order refrigerators and freezers if they qualify for replacement.

**28. The Companies should clarify the method by which it obtains and documents landlord approval to perform WARM measures and customer consent to share electric information with agencies/contractors.**

The Companies provide a landlord agreement form that must be completed before the WARM application is considered eligible. After the form is completed by the landlord the customer's application is eligible to be assigned to a WARM contractor/agency and the form is attached to the job upon assignment.

**29. The Companies should provide a copy of the landlord consent form and the tenant consent form if consents are obtained in writing. If consents are not obtained in writing, the Companies are directed to describe how consents are obtained and documented.**

Please see **Attachment "D"**.

When customers apply for PCAP /WARM by contacting Dollar Energy Fund (DEF), a representative obtains verbal agreement from the customer after reading the terms and conditions, which includes permission to share their information. DEF records all customer calls and customer consent is also documented in the system used to take the application. Terms and conditions are also stated at the bottom of the WARM paper application that can be submitted through the Companies' website, via email or USPS mail and requires the customer's agreement via signature. Please see **Attachment "E"**.

**30. The Companies should provide a copy of the auditor-customer partnership and savings strategy agreement form.**

Please see **Attachments "F" and "G"**.

**31. The Companies should clarify what increase in electric usage or other circumstances would qualify a residence for re-weatherization after five years. The Companies are also directed to explain if they allow for any exceptions to their current five-year limit between WARM services on a premises.**

If a customer has been served by WARM five or more years ago, the Companies will serve the premise if the customer's annual usage is 6,500 kWh or more.

The Companies do allow exceptions to their five-year limit between WARM services being provided at a premise. For example, the Companies will take into consideration whether there were full cost measures completed the last time the property was served and whether there is a health and safety issue that needed to be corrected for the job to be completed that has since been taken care of.

**32. The Companies should identify whether the WARM budget scenario described above is accurate or to provide corrections.**

The example stated by the Commission on how the health and safety budget is calculated is correct.

**33. The Companies should explain if it has a process for disqualifying/deferring homes for WARM services. If so, the Companies are directed to identify for each EDC, 1) how customers are notified of the reasons for disqualification; 2) the number of deferrals per year for the last three years, including the reasons for disqualification; 3) what agency/program the customers were deferred to, if appropriate; and 4) how long it maintains the list of deferrals.**

Contractors and agencies are encouraged to address barriers to completing a job utilizing the job's health and safety budget; however, there are times that the issue that needs to be resolved is beyond the scope of the program or budget.

1. If this is the case, the customer is provided with a health and safety form explaining what the customer would need to address before the remaining work can be completed. The customer signs the health and safety form acknowledging what must be done, and the job will remain on hold for six months. The job is closed after that time period if the customer has not resolved the issue. Please see **Attachment "H"**.

2. The Companies track jobs that are disqualified or deferred. However, the Companies only began tracking the reasons for deferrals using specific codes in our tracking system in mid-2022. Contractors were formally trained on the new coding functionality in November. See below for a summary of the available data.

<b>Met-Ed</b>				
<b>Job Code</b>	<b>Description</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
COVID-19	Work Deferred - Customer Concern about COVID-19	15	83	1
SD	Shell Measures Delayed - Structure Needs Repair	156	224	163
	<b>Shell Measures Delayed - Structure Needs Repair Detail</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	Active Roof Leaks Count	Not Available	Not Available	23
	Extenuating Circumstances and Restrictions Count	Not Available	Not Available	2
	Gas Leak Count	Not Available	Not Available	1
	High CO - Boiler/Furnace/Water Heater Count	Not Available	Not Available	3
	High CO in Ambient Air Count	Not Available	Not Available	1
	High CO in Oven Count	Not Available	Not Available	3
	High Spillage - Boiler/Furnace/Water Heater Count	Not Available	Not Available	5
	Hoarding/Clutter Count	Not Available	Not Available	7
	Inadequate Combustion Air Count	Not Available	Not Available	2
	Inadequate Ventilation Count	Not Available	Not Available	3
	Interior Pollutants Count	Not Available	Not Available	2
	Major Electrical Issues or Knob & Tube Wiring Count	Not Available	Not Available	7
	Moisture is in the Building Count	Not Available	Not Available	10
	Mold is in the Building Count	Not Available	Not Available	18
	Non-Working Combustion Appliance Count	Not Available	Not Available	12
	Pets, Pet Excrement or Pest Infestations Count	Not Available	Not Available	4
	Structural Integrity Problems Count	Not Available	Not Available	3
<p>Note: FirstEnergy began tracking the reasons shell measures were delayed part way through 2022. Therefore, reasons are not tallied for all 163 occurrences. Also, one job can have multiple reasons.</p>				

<b>Penelec</b>				
<b>Job Code</b>	<b>Description</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
COVID-19	Work Deferred - Customer Concern about COVID-19	29	69	41
SD	Shell Measures Delayed - Structure Needs Repair	133	247	209
	<b>Shell Measures Delayed - Structure Needs Repair Detail</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	Access to All Areas of Building is Inhibited Count	Not Available	Not Available	5
	Active Roof Leaks Count	Not Available	Not Available	26
	Extenuating Circumstances and Restrictions Count	Not Available	Not Available	9
	Gas Leak Count	Not Available	Not Available	2
	High CO - Boiler/Furnace/Water Heater Count	Not Available	Not Available	9
	High Spillage - Boiler/Furnace/Water Heater Count	Not Available	Not Available	4
	Hoarding/Clutter Count	Not Available	Not Available	11
	Inadequate Ventilation Count	Not Available	Not Available	2
	Interior Pollutants Count	Not Available	Not Available	5
	Major Electrical Issues or Knob & Tube Wiring Count	Not Available	Not Available	17
	Moisture is in the Building Count	Not Available	Not Available	17
	Mold is in the Building Count	Not Available	Not Available	13
	Non-Working Combustion Appliance Count	Not Available	Not Available	13
	Pets, Pet Excrement or Pest Infestations Count	Not Available	Not Available	5
	Structural Integrity Problems Count	Not Available	Not Available	7
<p>Note: FirstEnergy began tracking the reasons shell measures were delayed part way through 2022. Therefore, reasons are not tallied for all 209 occurrences. Also, one job can have multiple reasons.</p>				

Penn Power				
Job Code	Description	2020	2021	2022
COVID-19	Work Deferred - Customer Concern about COVID-19	1	5	1
SD	Shell Measures Delayed - Structure Needs Repair	27	26	66
	<b>Shell Measures Delayed - Structure Needs Repair Detail</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	Access to All Areas of Building is Inhibited Count	Not Available	Not Available	1
	Active Roof Leaks Count	Not Available	Not Available	4
	Dangerous Customer Activities Count	Not Available	Not Available	1
	Extenuating Circumstances and Restrictions Count	Not Available	Not Available	1
	Gas Leak Count	Not Available	Not Available	11
	High CO - Boiler/Furnace/Water Heater Count	Not Available	Not Available	3
	High CO in Ambient Air Count	Not Available	Not Available	1
	High CO in Oven Count	Not Available	Not Available	1
	High Spillage - Boiler/Furnace/Water Heater Count	Not Available	Not Available	1
	Hoarding/Clutter Count	Not Available	Not Available	2
	Interior Pollutants Count	Not Available	Not Available	2
	Major Electrical Issues or Knob & Tube Wiring Count	Not Available	Not Available	8
	Moisture is in the Building Count	Not Available	Not Available	6
	Mold is in the Building Count	Not Available	Not Available	2
	Non-Working Combustion Appliance Count	Not Available	Not Available	6
	Structural Integrity Problems Count	Not Available	Not Available	1
	Note: FirstEnergy began tracking the reasons shell measures were delayed part way through 2022. Therefore, reasons are not tallied for all 66 occurrences. Also, one job can have multiple reasons.			

West Penn Power				
Job Code	Description	2020	2021	2022
COVID-19	Work Deferred - Customer Concern about COVID-19	22	45	10
SD	Shell Measures Delayed - Structure Needs Repair	67	105	61
	<b>Shell Measures Delayed - Structure Needs Repair Detail</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	Active Roof Leaks Count	Not Available	Not Available	5
	Hoarding/Clutter Count	Not Available	Not Available	3
	Inadequate Ventilation Count	Not Available	Not Available	1
	Interior Pollutants Count	Not Available	Not Available	2
	Major Electrical Issues or Knob & Tube Wiring Count	Not Available	Not Available	1
	Moisture is in the Building Count	Not Available	Not Available	1
	Mold is in the Building Count	Not Available	Not Available	4
	Non-Working Combustion Appliance Count	Not Available	Not Available	8
	Pets, Pet Excrement or Pest Infestations Count	Not Available	Not Available	2
	Structural Integrity Problems Count	Not Available	Not Available	2
	Note: FirstEnergy began tracking the reasons shell measures were delayed part way through 2022. Therefore, reasons are not tallied for all 61 occurrences. Also, one job can have multiple reasons.			

3. Customers are referred to other programs that may be able to help them address the reason for the deferral when appropriate. Examples include LIHEAP Crisis, gas utility LIURP programs, the new Whole Home Repair program or other rehabilitation grant programs.

4. Jobs coded as deferred remain identified in our tracking system indefinitely, although they are coded as resolved when applicable.

**34. The Companies should explain its parameters and allowance threshold for performing incidental repairs.**

The health and safety allowance can be used to address incidental repairs and remediate barriers to completing weatherization measures.

**35. The Companies should explain the basis for and anticipated impact of this change and to clarify if it is still accepting WARM applications from customers with incomes between 151% and 200% of the FPIG who live in buildings served by Act 129 multifamily projects.**

The Companies continue to accept applications from customers with incomes between 151%-200% FPIG. WARM will evaluate the circumstances on a case-by-case basis for Act 129 multi-family projects. The intent was to serve a handful of customers (less than five) when a small number of customers are excluded from a project and the rest of the building is served. However, most multi-family buildings being served are large projects, and the original intent does not apply. The usage for these customers is often below 6,500 kWh annually. Instead of a formal process to accept customers defined as special needs, we will make the decision case-by-case that will largely be determined by the project size and number of customers excluded.

**36. The Companies should Clarify if it is still operating under the partial waiver of Section 58.11(a) and, if so, whether it proposes to seek a further continuation of this partial waiver. Further, if the Companies intend to seek a further continuation of the waiver, they are directed to provide justification for continuing the waiver. If the Companies have ceased operating under the waiver, they are directed to indicate when it ceased operations under the waiver.**

The Companies are still operating under the partial waiver of Section 58.11(a) and would like a continuation. Costs to perform energy conservation services have risen significantly in the last few years. The partial waiver gives the Companies flexibility to address more barriers and install more measures (e.g., attic insulation) that benefit WARM participants while the program is already at their home, reducing the need for return trips for five or more years in the future when costs will have likely increased.

**37. The Companies should outline the circumstances under which a customer could qualify for exceptions to its Hardship Fund eligibility guide.**

As provided by Dollar Energy Fund, Dollar Energy Fund will consider exceptions to the maximum income requirement or the sincere effort of payment requirement. Exceptions to qualify for hardship fund programs are approved to help those customers who are truly experiencing an extreme hardship. Documentation of the hardship may be required upon review.

Some common examples of acceptable hardships are:

- High out-of-pocket medical expenses
- Head of household had to quit work to care for a sick family member
- Fire, flood, or other disaster

**38. The Companies should explain what services are provided to customers identified in distress by the Gatekeeper program.**

When field staff encounters a customer in distress, they can notify the staff supporting the Gatekeeper program. The Gatekeeper staff will evaluate the information received about the customer's situation and work to identify the resources appropriate for the situation. This may be energy assistance referrals to help with billing, but it can also be a situation where we need to reach

out to local agencies to report the circumstances and request they evaluate potential assistance for the customer’s living conditions, health and wellness, etc.

**39. The Companies should identify customers served by this program annually from 2019 through 2022 and the estimated number of customers who may be served annually from 2024 through 2028.**

Gatekeeper 2019-2022 - Actual

Year	2019	2020	2021	2022
Participants	9	2	5	9

Gatekeeper 2024-2028 - Estimated

Year	2024	2025	2026	2027	2028
Participants	9	9	9	9	9

**40. The Companies should Provide the estimated cost of serving all customers potentially eligible for WARM. The Companies should provide data for each EDC that further distinguishes the total number of customers potentially eligible for WARM using the eligibility criteria described in the Order.**

FirstEnergy LIURP Needs Assessments				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Total Residential Customers (December 2021)</b>	513,743	501,640	143,672	632,933
<b>Number of Customers with Incomes at or Below 150% of FPIG</b>	109,200	146,334	34,284	150,565
Usage at or Above 6,500 kWh per Year	88,452	88,532	21,942	126,023
Received WARM in the Last Five Years	5,545	8,800	3,264	4,716
Less than Six Months of Usage History	1,520	1,467	327	1,238
Renters Projected where LL Refused	1,265	916	313	650
Projected to Drop Out	3,362	4,365	1,588	1,251
Number of Customers Receiving Services - Act 129	349	411	34	1,671
<b>Total Potential Participants</b>	76,411	72,573	16,416	116,497
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 389,741,946.60	\$ 214,525,788.00	\$ 66,109,366.08	\$ 722,509,734.12
<b>Estimated Renters</b>	74,243	43,577	9,467	57,316
<b>Number of Customers with Incomes 151-200% of FPIG</b>	48,355	57,086	14,856	60,818
Usage at or Above 6,500 kWh per Year	39,168	34,537	9,508	50,905
Received WARM in the Last Five Years	1,259	1,099	437	711
Less than Six Months of Usage History	673	572	142	500
Renters Projected where LL Refused	942	714	127	222
Projected to Drop Out	763	545	212	189
<b>Total Potential Participants</b>	35,531	31,607	8,590	49,283
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 181,230,057.80	\$ 93,431,000.45	\$ 34,593,008.16	\$ 305,651,194.68
<b>Estimated Renters</b>	25,421	13,560	3,844	19,579

Note: The weighted average job costs used to estimate the cost to serve potential participants do not include administration, field support or inspection costs.

It is not known if a job will be deferred due to health and safety issues until a home audit takes place. Therefore, no data on deferrals is presented here. However, the Companies have prepared a separate spreadsheet with data on deferrals.

The original submitted WARM needs assessment excluded all homes that had previously been a part of WARM and did not estimate how many customers with incomes from 151-200% of FPIG might qualify for WARM.

**41. The Companies should explain what steps it is taking to increase customer participation in WARM, specifically in Penn Power’s service territory.**

The Companies are updating their outreach materials for the WARM program and have multiple initiatives planned for 2023 to increase awareness and program applications. Examples include: 1) partnering with community organizations by educating them about our program and providing materials for them to share with members of the community; 2) increasing digital communications to reach customers via email and potentially text messaging; 3) advertising the WARM program in local publications; 4) conducting outbound call campaigns to advertise the program and explain the benefits; 5) leveraging FirstEnergy Call Center staff to incorporate

communicating the program into current processes; and 6) new social media campaigns on Facebook, Instagram, Twitter and TikTok.

Based on actual end-of-year 2022 budget data and the first quarter of 2023, the Companies propose budget increases for Met-Ed, Penelec and West Penn Power WARM budgets as reflected in the attached amended plan. This is due primarily to higher prices and higher job costs. The enrollment goal for West Penn Power has been increased slightly from 970 to 1,000.

**42. The Companies should Confirm whether the summary of its universal service organizational structure reflected in Table 17 is accurate or to provide any needed corrections and clarifications.**

Table 17. Universal Service Organizational Structure

Manager – Revenue Operations Strategy

Administrative Assistant

Supervisor – Human Services – Universal Service	Supervisor – Human Services – Energy Conservation
7 Business Analysts	9 Business Analysts
2 Customer Accounting Associates	1 Customer Accounting Associate

## **II. CONCLUSION**

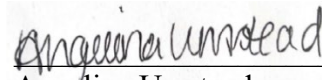
Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company appreciate the opportunity to submit the foregoing supplemental information and attached Amended Joint Universal Service and Energy Conservation Plan for plan years 2024-2028. A copy of the amended plan is attached hereto as **Attachment “I”**. The proposed Joint Plan is consistent with the Commission’s universal service regulations and policy statements and promotes a wide range of assistance and energy conservation options to low-income customers. Accordingly, Metropolitan Edison Company, Pennsylvania

Electric Company, Pennsylvania Power Company, and West Penn Power Company respectfully request that the Commission approve the proposed Joint Universal Service and Energy Conservation Plan as revised herein.

Respectfully Submitted,

Date: April 25, 2023

By:



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## Proposed PIP- Estimated Subsidy with No Maximum Limit

## Met-Ed

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 3,255,447	\$ 3,262,322	\$ 3,269,198	\$ 3,276,073	\$ 3,282,948
<b>51-100%</b>	\$ 1,838,382	\$ 1,842,264	\$ 1,846,147	\$ 1,850,029	\$ 1,853,912
<b>101-150%</b>	\$ 822,202	\$ 823,939	\$ 825,675	\$ 827,412	\$ 829,148
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 4,450,181	\$ 4,459,579	\$ 4,468,978	\$ 4,478,376	\$ 4,487,775
<b>51-100%</b>	\$ 3,969,802	\$ 3,978,186	\$ 3,986,570	\$ 3,994,954	\$ 4,003,338
<b>101-150%</b>	\$ 2,078,798	\$ 2,083,188	\$ 2,087,578	\$ 2,091,969	\$ 2,096,359

## Penelec

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 1,948,771	\$ 1,984,722	\$ 2,021,317	\$ 2,058,664	\$ 2,096,654
<b>51-100%</b>	\$ 1,465,154	\$ 1,492,183	\$ 1,519,697	\$ 1,547,775	\$ 1,576,338
<b>101-150%</b>	\$ 507,691	\$ 517,057	\$ 526,591	\$ 536,320	\$ 546,218
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 5,047,823	\$ 5,140,946	\$ 5,235,737	\$ 5,332,474	\$ 5,430,878
<b>51-100%</b>	\$ 6,310,766	\$ 6,427,188	\$ 6,545,695	\$ 6,666,635	\$ 6,789,660
<b>101-150%</b>	\$ 3,652,101	\$ 3,719,475	\$ 3,788,057	\$ 3,858,046	\$ 3,929,241

## Penn Power

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 671,262	\$ 706,766	\$ 744,163	\$ 783,454	\$ 824,797
<b>51-100%</b>	\$ 550,298	\$ 579,404	\$ 610,063	\$ 642,273	\$ 676,166
<b>101-150%</b>	\$ 257,623	\$ 271,249	\$ 285,601	\$ 300,681	\$ 316,548
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 1,162,319	\$ 1,223,796	\$ 1,288,551	\$ 1,356,585	\$ 1,428,171
<b>51-100%</b>	\$ 1,430,744	\$ 1,506,419	\$ 1,586,129	\$ 1,669,875	\$ 1,757,993
<b>101-150%</b>	\$ 762,105	\$ 802,414	\$ 844,873	\$ 889,481	\$ 936,418

## West Penn Power

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 2,369,272	\$ 2,475,592	\$ 2,586,751	\$ 2,702,900	\$ 2,824,192
<b>51-100%</b>	\$ 1,714,127	\$ 1,791,047	\$ 1,871,469	\$ 1,955,501	\$ 2,043,254
<b>101-150%</b>	\$ 561,505	\$ 586,703	\$ 613,047	\$ 640,573	\$ 669,319
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 4,455,652	\$ 4,655,596	\$ 4,864,642	\$ 5,083,073	\$ 5,311,174
<b>51-100%</b>	\$ 4,692,417	\$ 4,902,986	\$ 5,123,140	\$ 5,353,178	\$ 5,593,400
<b>101-150%</b>	\$ 2,357,225	\$ 2,463,003	\$ 2,573,597	\$ 2,689,156	\$ 2,809,831

Estimated subsidy cost is based on 2022 PCAP participants that were enrolled on PCAP and billed in 2022. The average grant per participant was applied to the projected participants for each year.

## Fixed Credit- Estimated Subsidy with Current Maximums

## Met-Ed

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 2,548,759	\$ 2,554,142	\$ 2,559,525	\$ 2,564,908	\$ 2,570,291
<b>51-100%</b>	\$ 1,843,512	\$ 1,847,406	\$ 1,851,299	\$ 1,855,193	\$ 1,859,086
<b>101-150%</b>	\$ 615,912	\$ 617,213	\$ 618,514	\$ 619,815	\$ 621,116
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 2,649,559	\$ 2,655,155	\$ 2,660,751	\$ 2,666,346	\$ 2,671,942
<b>51-100%</b>	\$ 3,136,660	\$ 3,143,285	\$ 3,149,909	\$ 3,156,533	\$ 3,163,158
<b>101-150%</b>	\$ 1,940,391	\$ 1,944,489	\$ 1,948,587	\$ 1,952,685	\$ 1,956,783

## Penelec

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 1,507,769	\$ 1,535,584	\$ 1,563,898	\$ 1,592,793	\$ 1,622,186
<b>51-100%</b>	\$ 1,514,109	\$ 1,542,041	\$ 1,570,474	\$ 1,599,491	\$ 1,629,007
<b>101-150%</b>	\$ 520,287	\$ 529,885	\$ 539,656	\$ 549,626	\$ 559,769
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 3,119,225	\$ 3,176,768	\$ 3,235,343	\$ 3,295,120	\$ 3,355,928
<b>51-100%</b>	\$ 5,323,453	\$ 5,421,661	\$ 5,521,628	\$ 5,623,647	\$ 5,727,425
<b>101-150%</b>	\$ 3,242,153	\$ 3,301,964	\$ 3,362,847	\$ 3,424,980	\$ 3,488,184

## Penn Power

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 516,913	\$ 544,253	\$ 573,052	\$ 603,308	\$ 635,144
<b>51-100%</b>	\$ 518,145	\$ 545,550	\$ 574,417	\$ 604,746	\$ 636,658
<b>101-150%</b>	\$ 276,725	\$ 291,362	\$ 306,779	\$ 322,976	\$ 340,020
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 724,158	\$ 762,459	\$ 802,804	\$ 845,191	\$ 889,791
<b>51-100%</b>	\$ 1,167,047	\$ 1,228,774	\$ 1,293,793	\$ 1,362,104	\$ 1,433,981
<b>101-150%</b>	\$ 728,629	\$ 767,168	\$ 807,761	\$ 850,410	\$ 895,286

## West Penn Power

Heating	2024	2025	2026	2027	2028
<b>0-50%</b>	\$ 1,877,482	\$ 1,961,733	\$ 2,049,818	\$ 2,141,859	\$ 2,237,974
<b>51-100%</b>	\$ 1,674,859	\$ 1,750,017	\$ 1,828,597	\$ 1,910,704	\$ 1,996,446
<b>101-150%</b>	\$ 378,966	\$ 395,972	\$ 413,752	\$ 432,330	\$ 451,731
<b>Non-Heating</b>					
<b>0-50%</b>	\$ 2,748,547	\$ 2,871,886	\$ 3,000,840	\$ 3,135,583	\$ 3,276,291
<b>51-100%</b>	\$ 3,842,449	\$ 4,014,876	\$ 4,195,152	\$ 4,383,522	\$ 4,580,231
<b>101-150%</b>	\$ 2,256,744	\$ 2,358,014	\$ 2,463,894	\$ 2,574,527	\$ 2,690,058

for 12 months during 2022.

Company	Estimated # of Recipients - 2024	12-MONTHS PPA		24-MONTHS PPA		36-MONTHS PPA	
		EH	NH	EH	NH	EH	NH
<b>ME</b>	<b>13,258</b>						
0-50%		\$ 1,841,600	\$ 2,166,588	\$ 907,057	\$ 1,067,126	\$ 604,704	\$ 711,417
51-100%		\$ 1,516,612	\$ 1,949,929	\$ 746,988	\$ 960,413	\$ 497,992	\$ 640,275
101-150%		\$ 1,516,612	\$ 1,841,600	\$ 746,988	\$ 907,057	\$ 497,992	\$ 604,704
Total Def	16,168,569						
12 Mon	10,832,941						
24 Mon	5,335,628						
36 Mon	3,557,085						
<b>PN</b>	<b>18159</b>						
0-50%		\$ 1,295,839	\$ 2,709,482	\$ 638,249	\$ 1,334,521	\$ 425,499	\$ 889,681
51-100%		\$ 1,178,036	\$ 3,062,893	\$ 580,226	\$ 1,508,589	\$ 386,818	\$ 1,005,726
101-150%		\$ 942,428	\$ 2,591,678	\$ 464,181	\$ 1,276,498	\$ 309,454	\$ 850,999
Total Def	17,582,621						
12 Mon	11,780,356						
24 Mon	5,802,265						
36 Mon	3,868,177						
<b>PP</b>	<b>4254</b>						
0-50%		\$ 321,435	\$ 562,511	\$ 158,319	\$ 277,058	\$ 105,546	\$ 184,705
51-100%		\$ 348,221	\$ 616,084	\$ 171,512	\$ 303,444	\$ 114,341	\$ 202,296
101-150%		\$ 321,435	\$ 508,939	\$ 158,319	\$ 250,671	\$ 105,546	\$ 167,114
Total Def	3,997,947						
12 Mon	2,678,624						
24 Mon	1,319,322						
36 Mon	879,548						
<b>WPP</b>	<b>15666</b>						
0-50%		\$ 1,531,588	\$ 2,709,732	\$ 754,364	\$ 1,334,644	\$ 502,909	\$ 889,763
51-100%		\$ 1,531,588	\$ 2,709,732	\$ 754,364	\$ 1,334,644	\$ 502,909	\$ 889,763
101-150%		\$ 1,178,145	\$ 2,120,660	\$ 580,280	\$ 1,044,504	\$ 386,853	\$ 696,336
Total Def	17,584,247						
12 Mon	11,781,446						
24 Mon	5,802,802						
36 Mon	3,868,534						

FPL % is prorated based on current participation FPL statistics.

Company	Estimated # of Recipients - 2025	12-MONTHS PPA		24-MONTHS PPA		36-MONTHS PPA	
		EH	NH	EH	NH	EH	NH
<b>ME</b>	<b>13,286</b>						
0-50%		\$ 1,076,233	\$ 1,266,157	\$ 838,484	\$ 986,452	\$ 625,507	\$ 735,891
51-100%		\$ 886,310	\$ 1,139,541	\$ 690,517	\$ 887,807	\$ 515,123	\$ 662,302
101-150%		\$ 886,310	\$ 1,076,233	\$ 690,517	\$ 838,484	\$ 515,123	\$ 625,507
Total Def	\$ 9,448,932						
12 Mon	\$ 6,330,784						
24 Mon	\$ 4,932,261						
36 Mon	\$ 3,679,453						
<b>PN</b>	<b>26277</b>						
0-50%		\$ 740,184	\$ 1,547,657	\$ 581,573	\$ 1,216,016	\$ 434,520	\$ 908,542
51-100%		\$ 672,894	\$ 1,749,525	\$ 528,703	\$ 1,374,627	\$ 395,018	\$ 1,027,048
101-150%		\$ 538,315	\$ 1,480,367	\$ 422,962	\$ 1,163,146	\$ 316,015	\$ 869,040
Total Def	\$ 10,043,198						
12 Mon	\$ 6,728,943						
24 Mon	\$ 5,287,026						
36 Mon	\$ 3,950,183						
<b>PP</b>	<b>6622</b>						
0-50%		\$ 175,653	\$ 307,392	\$ 140,344	\$ 245,602	\$ 105,173	\$ 184,052
51-100%		\$ 190,291	\$ 336,668	\$ 152,039	\$ 268,993	\$ 113,937	\$ 201,581
101-150%		\$ 175,653	\$ 278,117	\$ 140,344	\$ 222,211	\$ 105,173	\$ 166,523
Total Def	\$ 2,184,737						
12 Mon	\$ 1,463,774						
24 Mon	\$ 1,169,533						
36 Mon	\$ 876,439						
<b>WPP</b>	<b>21736</b>						
0-50%		\$ 925,813	\$ 1,637,977	\$ 712,481	\$ 1,260,544	\$ 530,308	\$ 938,237
51-100%		\$ 925,813	\$ 1,637,977	\$ 712,481	\$ 1,260,544	\$ 530,308	\$ 938,237
101-150%		\$ 712,164	\$ 1,281,895	\$ 548,063	\$ 986,513	\$ 407,929	\$ 734,272
Total Def	\$ 10,629,313						
12 Mon	\$ 7,121,640						
24 Mon	\$ 5,480,626						
36 Mon	\$ 4,079,289						

Company	Estimated # of Recipients - 2026	12-MONTHS PPA		24-MONTHS PPA		36-MONTHS PPA	
		EH	NH	EH	NH	EH	NH
<b>ME</b>	<b>13,314</b>						
0-50%		\$ 823,662	\$ 969,014	\$ 792,541	\$ 932,401	\$ 641,733	\$ 754,980
51-100%		\$ 678,310	\$ 872,113	\$ 652,681	\$ 839,161	\$ 528,486	\$ 679,482
101-150%		\$ 678,310	\$ 823,662	\$ 652,681	\$ 792,541	\$ 528,486	\$ 641,733
Total Def	\$ 7,231,451						
12 Mon	\$ 4,845,072						
24 Mon	\$ 4,662,005						
36 Mon	\$ 3,774,900						
<b>PN</b>	<b>18,159</b>						
0-50%		\$ 860,536	\$ 1,012,395	\$ 840,109	\$ 988,363	\$ 682,405	\$ 802,830
51-100%		\$ 708,677	\$ 911,156	\$ 691,854	\$ 889,527	\$ 561,981	\$ 722,547
101-150%		\$ 708,677	\$ 860,536	\$ 691,854	\$ 840,109	\$ 561,981	\$ 682,405
Total Def	\$ 7,555,189						
12 Mon	\$ 5,061,976						
24 Mon	\$ 4,941,815						
36 Mon	\$ 4,014,148						
<b>PP</b>	<b>4,716</b>						
0-50%		\$ 180,688	\$ 212,575	\$ 181,760	\$ 213,835	\$ 148,582	\$ 174,803
51-100%		\$ 148,802	\$ 191,317	\$ 149,684	\$ 192,451	\$ 122,362	\$ 157,322
101-150%		\$ 148,802	\$ 180,688	\$ 149,684	\$ 181,760	\$ 122,362	\$ 148,582
Total Def	\$ 1,586,378						
12 Mon	\$ 1,062,873						
24 Mon	\$ 1,069,174						
36 Mon	\$ 874,013						
<b>WP</b>	<b>17,104</b>						
0-50%		\$ 949,264	\$ 1,116,781	\$ 895,011	\$ 1,052,954	\$ 721,425	\$ 848,736
51-100%		\$ 781,746	\$ 1,005,103	\$ 737,068	\$ 947,658	\$ 594,115	\$ 763,862
101-150%		\$ 781,746	\$ 949,264	\$ 737,068	\$ 895,011	\$ 594,115	\$ 721,425
Total Def	\$ 8,334,184						
12 Mon	\$ 5,583,904						
24 Mon	\$ 5,264,768						
36 Mon	\$ 4,243,678						

Company	Estimated # of Recipients - 2027	12-MONTHS PPA		24-MONTHS PPA		36-MONTHS PPA	
		EH	NH	EH	NH	EH	NH
<b>ME</b>	<b>13,342</b>						
0-50%		\$ 740,314	\$ 870,958	\$ 761,759	\$ 896,187	\$ 654,389	\$ 769,870
51-100%		\$ 609,670	\$ 783,862	\$ 627,331	\$ 806,568	\$ 538,909	\$ 692,883
101-150%		\$ 609,670	\$ 740,314	\$ 627,331	\$ 761,759	\$ 538,909	\$ 654,389
Total Def	\$ 6,499,683						
12 Mon	\$ 4,354,788						
24 Mon	\$ 4,480,934						
36 Mon	\$ 3,849,349						
<b>PN</b>	<b>19,183</b>						
0-50%		\$ 767,019	\$ 902,375	\$ 800,789	\$ 942,105	\$ 690,887	\$ 812,808
51-100%		\$ 631,663	\$ 812,138	\$ 659,473	\$ 847,894	\$ 568,966	\$ 731,527
101-150%		\$ 631,663	\$ 767,019	\$ 659,473	\$ 800,789	\$ 568,966	\$ 690,887
Total Def	\$ 6,734,145						
12 Mon	\$ 4,511,877						
24 Mon	\$ 4,710,524						
36 Mon	\$ 4,064,041						
<b>PP</b>	<b>4,965</b>						
0-50%		\$ 158,198	\$ 186,115	\$ 170,329	\$ 200,387	\$ 148,261	\$ 174,424
51-100%		\$ 130,281	\$ 167,504	\$ 140,271	\$ 180,348	\$ 122,097	\$ 156,982
101-150%		\$ 130,281	\$ 158,198	\$ 140,271	\$ 170,329	\$ 122,097	\$ 148,261
Total Def	\$ 1,388,919						
12 Mon	\$ 930,576						
24 Mon	\$ 1,001,933						
36 Mon	\$ 872,122						
<b>WP</b>	<b>17,872</b>						
0-50%		\$ 862,997	\$ 1,015,290	\$ 870,424	\$ 1,024,029	\$ 743,223	\$ 874,380
51-100%		\$ 710,703	\$ 913,761	\$ 716,820	\$ 921,626	\$ 612,066	\$ 786,942
101-150%		\$ 710,703	\$ 862,997	\$ 716,820	\$ 870,424	\$ 612,066	\$ 743,223
Total Def	\$ 7,576,792						
12 Mon	\$ 5,076,451						
24 Mon	\$ 5,120,143						
36 Mon	\$ 4,371,901						

Company	Estimated # of Recipients - 2028	12-MONTHS PPA		24-MONTHS PPA		36-MONTHS PPA	
		EH	NH	EH	NH	EH	NH
<b>ME</b>	<b>13,370</b>						
0-50%		\$ 712,809	\$ 838,599	\$ 741,135	\$ 871,923	\$ 664,261	\$ 781,484
51-100%		\$ 587,019	\$ 754,739	\$ 610,346	\$ 784,731	\$ 547,039	\$ 703,335
101-150%		\$ 587,019	\$ 712,809	\$ 610,346	\$ 741,135	\$ 547,039	\$ 664,261
Total Def	\$ 6,258,199						
12 Mon	\$ 4,192,994						
24 Mon	\$ 4,359,616						
36 Mon	\$ 3,907,419						
<b>PN</b>	<b>19,537</b>						
0-50%		\$ 736,159	\$ 866,069	\$ 774,445	\$ 911,112	\$ 697,503	\$ 820,591
51-100%		\$ 606,248	\$ 779,462	\$ 637,778	\$ 820,001	\$ 574,414	\$ 738,532
101-150%		\$ 606,248	\$ 736,159	\$ 637,778	\$ 774,445	\$ 574,414	\$ 697,503
Total Def	\$ 6,463,201						
12 Mon	\$ 4,330,345						
24 Mon	\$ 4,555,559						
36 Mon	\$ 4,102,957						
<b>PP</b>	<b>5,227</b>						
0-50%		\$ 150,776	\$ 177,384	\$ 162,670	\$ 191,376	\$ 148,010	\$ 174,129
51-100%		\$ 124,168	\$ 159,645	\$ 133,963	\$ 172,239	\$ 121,890	\$ 156,716
101-150%		\$ 124,168	\$ 150,776	\$ 133,963	\$ 162,670	\$ 121,890	\$ 148,010
Total Def	\$ 1,323,758						
12 Mon	\$ 886,918						
24 Mon	\$ 956,882						
36 Mon	\$ 870,646						
<b>WP</b>	<b>18,674</b>						
0-50%		\$ 834,529	\$ 981,798	\$ 853,952	\$ 1,004,649	\$ 760,226	\$ 894,383
51-100%		\$ 687,259	\$ 883,618	\$ 703,254	\$ 904,184	\$ 626,068	\$ 804,945
101-150%		\$ 687,259	\$ 834,529	\$ 703,254	\$ 853,952	\$ 626,068	\$ 760,226
Total Def	\$ 7,326,853						
12 Mon	\$ 4,908,991						
24 Mon	\$ 5,023,245						
36 Mon	\$ 4,471,916						

Number of Active Participants Eligible for PPA in New Plan

For all active PCAP customers at month end February 2023, 64,736 PCAP customers have a balance greater than zero and would qualify for PPA if enrolled on the proposed program. The sum of their current balance is \$41,287,221. Of that balance \$25,879,494 will be added to the existing PPA balance of \$15,836,230.

The table below simulates how forgiveness is anticipated to flow through 2028 with the beginning Est. conversion balance of \$41,287,221 and Est. new PPA dollars accrued each year:

Totals Based on 12-month Forgiveness Model

Company	Est. Conversion Enrolled	Est. Conversion Re-Deferred	Est. Enrolled PPA	Est. Re-deferred PPA	Est. PPA Balance for 2024	Est. Forgiveness for 2024	Est. Carryover from 2024	Est. 2025 Enrolled
ME	\$ 7,579,008	\$ 4,476,257	\$ 3,349,304	\$ 764,000	\$ 16,168,569	\$ 10,832,941	\$ 5,335,628	\$ 3,349,304
PN	\$ 8,735,641	\$ 4,606,047	\$ 3,652,445	\$ 588,488	\$ 17,582,621	\$ 11,780,356	\$ 5,802,265	\$ 3,652,445
PP	\$ 1,934,165	\$ 1,198,367	\$ 723,174	\$ 142,240	\$ 3,997,947	\$ 2,678,624	\$ 1,319,322	\$ 723,174
WP	\$ 7,630,680	\$ 5,127,056	\$ 3,541,630	\$ 1,284,882	\$ 17,584,247	\$ 11,781,446	\$ 5,802,802	\$ 3,541,630
			ME	AVG		\$ 817		
			PN			\$ 649		
			PP			\$ 630		
			WP			\$ 752		

Totals Based on 24-month Forgiveness Model

Company	Est. Conversion Enrolled	Est. Conversion Re-Deferred	Est. Enrolled PPA	Est. Re-deferred PPA	Estimated PPA Balance for 2	Est. Forgiveness for 2024	Est. Carryover from 2024	Est. 2025 Enrolled
ME	\$ 7,579,008	\$ 4,476,257	\$ 3,349,304	\$ 764,000	\$ 16,168,569	\$ 5,335,628	\$ 10,832,941	\$ 3,349,304
PN	\$ 8,735,641	\$ 4,606,047	\$ 3,652,445	\$ 588,488	\$ 17,582,621	\$ 5,802,265	\$ 11,780,356	\$ 3,652,445
PP	\$ 1,934,165	\$ 1,198,367	\$ 723,174	\$ 142,240	\$ 3,997,947	\$ 1,319,322	\$ 2,678,624	\$ 723,174
WP	\$ 7,630,680	\$ 5,127,056	\$ 3,541,630	\$ 1,284,882	\$ 17,584,247	\$ 5,802,802	\$ 11,781,446	\$ 3,541,630
			ME	AVG		\$ 402		
			PN			\$ 320		
			PP			\$ 310		
			WP			\$ 370		

Totals Based on 36-month Forgiveness Model

Company	Est. Conversion Enrolled	Est. Conversion Re-Deferred	Est. Enrolled PPA	Est. Re-deferred PPA	Estimated PPA Balance for 2	Est. Forgiveness for 2024	Est. Carryover from 2024	Est. 2025 Enrolled
ME	\$ 7,579,008	\$ 4,476,257	\$ 3,349,304	\$ 764,000	\$ 16,168,569	\$ 3,557,085	\$ 12,611,484	\$ 3,349,304
PN	\$ 8,735,641	\$ 4,606,047	\$ 3,652,445	\$ 588,488	\$ 17,582,621	\$ 3,868,177	\$ 13,714,445	\$ 3,652,445
PP	\$ 1,934,165	\$ 1,198,367	\$ 723,174	\$ 142,240	\$ 3,997,947	\$ 879,548	\$ 3,118,398	\$ 723,174
WP	\$ 7,630,680	\$ 5,127,056	\$ 3,541,630	\$ 1,284,882	\$ 17,584,247	\$ 3,868,534	\$ 13,715,713	\$ 3,541,630
			ME	AVG		\$ 268		
			PN			\$ 213		
			PP			\$ 207		
			WP			\$ 247		

\*Assumption is 71% of the PCAP bills are paid monthly. Which equates to the following for forgiveness dollars; 1/12th = 67%, 1/24th = 33%, 1/36th = 22% of preprogram dollars forgiven annually

\*\*Conversion balances are Est. based on month end participants and balances on March 22, 2023

\*\*\*Enrolled and Redeferred are Est. based on actual balances deferred in 2019

\*\*\*\*Assuming participants that are removed will re-enroll. Program implementation January 2024.

Number of Ac	me	\$	17,273	\$	9,526,133	\$	5,644,733
For all active f	pn	\$	21,245	\$	9,715,189	\$	5,525,480
The sum of th	pp	\$	4,656	\$	2,481,816	\$	1,432,081
The table belc	wpp	\$	19,398	\$	10,548,756	\$	6,171,417
Totals Based c		\$	62,572	\$	32,271,895	\$	18,773,711

Company	Est. 2025 Re-deferred	Est. PPA Balance for 2025	Est. Forgiveness for 2025	Est. Carryover from 2025	Est. 2026 Enrolled	Est. 2026 Re-deferred	Est. PPA Balance for 2026	Est. Forgiveness for 2026
ME	\$ 764,000	\$ 9,448,932	\$ 6,330,784	\$ 3,118,147	\$ 3,349,304	\$ 764,000	\$ 7,231,451	\$ 4,845,072
PN	\$ 588,488	\$ 10,043,198	\$ 6,728,943	\$ 3,314,255	\$ 3,652,445	\$ 588,488	\$ 7,555,189	\$ 5,061,976
PP	\$ 142,240	\$ 2,184,737	\$ 1,463,774	\$ 720,963	\$ 723,174	\$ 142,240	\$ 1,586,378	\$ 1,062,873
WP	\$ 1,284,882	\$ 10,629,313	\$ 7,121,640	\$ 3,507,673	\$ 3,541,630	\$ 1,284,882	\$ 8,334,184	\$ 5,583,904
			477					364
			364					269
			327					225
			435					326

Company	Est. 2025 Re-deferred	Estimate PPA Balance for 2025	Est. Forgiveness for 2025	Est. Carryover from 2025	Est. 2026 Enrolled	Est. 2026 Re-deferred	Estimate PPA Balance for 2026	Est. Forgiveness for 2026
ME	\$ 764,000	\$ 14,946,245	\$ 4,932,261	\$ 10,013,984	\$ 3,349,304	\$ 764,000	\$ 14,127,288	\$ 4,662,005
PN	\$ 588,488	\$ 16,021,289	\$ 5,287,026	\$ 10,734,264	\$ 3,652,445	\$ 588,488	\$ 14,975,197	\$ 4,941,815
PP	\$ 142,240	\$ 3,544,039	\$ 1,169,533	\$ 2,374,506	\$ 723,174	\$ 142,240	\$ 3,239,920	\$ 1,069,174
WP	\$ 1,284,882	\$ 16,607,957	\$ 5,480,626	\$ 11,127,331	\$ 3,541,630	\$ 1,284,882	\$ 15,953,842	\$ 5,264,768
			371					350
			286					262
			261					227
			335					308

Company	Est. 2025 Re-deferred	Estimate PPA Balance for 2025	Est. Forgiveness for 2025	Est. Carryover from 2025	Est. 2026 Enrolled	Est. 2026 Re-deferred	Estimate PPA Balance for 2026	Est. Forgiveness for 2026
ME	\$ 764,000	\$ 16,724,788	\$ 3,679,453	\$ 13,045,334	\$ 3,349,304	\$ 764,000	\$ 17,158,638	\$ 3,774,900
PN	\$ 588,488	\$ 17,955,378	\$ 3,950,183	\$ 14,005,195	\$ 3,652,445	\$ 588,488	\$ 18,246,128	\$ 4,014,148
PP	\$ 142,240	\$ 3,983,813	\$ 876,439	\$ 3,107,374	\$ 723,174	\$ 142,240	\$ 3,972,788	\$ 874,013
WP	\$ 1,284,882	\$ 18,542,224	\$ 4,079,289	\$ 14,462,935	\$ 3,541,630	\$ 1,284,882	\$ 19,289,446	\$ 4,243,678
			277					284
			214					213
			196					185
			249					248

\*Assumption i:  
 \*\*Conversion I  
 \*\*\*Enrolled ar  
 \*\*\*\*Assuming

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Company	Est. Carryover from 2026	Est. 2027 Enrolled	Est. 2027 Re-deferred	Est. PPA Balance for 2027	Est. Forgiveness for 2027	Est. Carryover from 2027	Est. 2028 Enrolled	Est. 2028 Re-deferred
ME	\$ 2,386,379	\$ 3,349,304	\$ 764,000	\$ 6,499,683	\$ 4,354,788	\$ 2,144,895	\$ 3,349,304	\$ 764,000
PN	\$ 2,493,212	\$ 3,652,445	\$ 588,488	\$ 6,734,145	\$ 4,511,877	\$ 2,222,268	\$ 3,652,445	\$ 588,488
PP	\$ 523,505	\$ 723,174	\$ 142,240	\$ 1,388,919	\$ 930,576	\$ 458,343	\$ 723,174	\$ 142,240
WP	\$ 2,750,281	\$ 3,541,630	\$ 1,284,882	\$ 7,576,792	\$ 5,076,451	\$ 2,500,341	\$ 3,541,630	\$ 1,284,882
				\$ 326				
				\$ 235				
				\$ 187				
				\$ 284				

Totals Based c

Company	Est. Carryover from 2026	Est. 2027 Enrolled	Est. 2027 Re-deferred	Estimate PPA Balance for 2027	Est. Carryover from 2027	Est. 2028 Enrolled	Est. 2028 Re-deferred
ME	\$ 9,465,283	\$ 3,349,304	\$ 764,000	\$ 13,578,587	\$ 4,480,934	\$ 3,349,304	\$ 764,000
PN	\$ 10,033,382	\$ 3,652,445	\$ 588,488	\$ 14,274,315	\$ 4,710,524	\$ 3,652,445	\$ 588,488
PP	\$ 2,170,747	\$ 723,174	\$ 142,240	\$ 3,036,161	\$ 1,001,933	\$ 723,174	\$ 142,240
WP	\$ 10,689,074	\$ 3,541,630	\$ 1,284,882	\$ 15,515,586	\$ 5,120,143	\$ 3,541,630	\$ 1,284,882
				\$ 336			
				\$ 246			
				\$ 202			
				\$ 286			

Totals Based c

Company	Est. Carryover from 2026	Est. 2027 Enrolled	Est. 2027 Re-deferred	Estimate PPA Balance for 2027	Est. Carryover from 2027	Est. 2028 Enrolled	Est. 2028 Re-deferred
ME	\$ 13,383,738	\$ 3,349,304	\$ 764,000	\$ 17,497,042	\$ 3,849,349	\$ 3,349,304	\$ 764,000
PN	\$ 14,231,980	\$ 3,652,445	\$ 588,488	\$ 18,472,913	\$ 4,064,041	\$ 3,652,445	\$ 588,488
PP	\$ 3,098,775	\$ 723,174	\$ 142,240	\$ 3,964,189	\$ 872,122	\$ 723,174	\$ 142,240
WP	\$ 15,045,768	\$ 3,541,630	\$ 1,284,882	\$ 19,872,279	\$ 4,371,901	\$ 3,541,630	\$ 1,284,882
				\$ 289			
				\$ 212			
				\$ 176			
				\$ 245			

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Totals Based c	Company	Estimate PPA Balance for 2028	Est. Forgiveness for 2028	Est. Carryover from 2028
	ME	\$ 6,258,199	\$ 4,192,994	\$ 2,065,206
	PN	\$ 6,463,201	\$ 4,330,345	\$ 2,132,856
	PP	\$ 1,323,758	\$ 886,918	\$ 436,840
	WP	\$ 7,326,853	\$ 4,908,991	\$ 2,417,861
			314	
			222	
			170	
			263	

Totals Based c	Company	Estimate PPA Balance for 2028	Est. Carryover from 2028
	ME	\$ 13,210,957	\$ 8,851,341
	PN	\$ 13,804,724	\$ 9,249,165
	PP	\$ 2,899,642	\$ 1,942,760
	WP	\$ 15,221,954	\$ 10,198,709
		326	
		233	
		183	
		269	

Totals Based c	Company	Estimate PPA Balance for 2028	Est. Carryover from 2028
	ME	\$ 17,760,997	\$ 13,853,577
	PN	\$ 18,649,805	\$ 14,546,848
	PP	\$ 3,957,482	\$ 3,086,836
	WP	\$ 20,326,889	\$ 15,854,973
		292	
		210	
		167	
		239	

\*Assumption i:  
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## [\*Subscriber.FirstName\*], take advantage of bill savings + debt forgiveness

Apply Today

Your energy bills can be more affordable. Let FirstEnergy help you find relief.

For eligible customers, the Pennsylvania Customer Assistance Program (PCAP) makes your payments more manageable and consistent year-round. Upon enrollment, your outstanding balance will be set aside for forgiveness. **Reduce your past-due balance by 1/36 each month when you pay in-full.**

### PCAP Benefits:

- Automatic enrollment in the Equal Payment Plan to avoid seasonal bill spikes
- A monthly credit toward your electric bill
- A one-time opportunity to have your current account balance forgiven
- An opportunity to improve energy efficiency through the WARM program

To apply for PCAP, your income must be at or below 150% of the federal poverty guidelines.

### Consistent bills + debt forgiveness

Click below to learn more about PCAP and start the application process.

Lower Your Payments + Eliminate Debt

**FirstEnergy**

Mid-Est • Panhandle • Power Power • West Penn Power

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## |\*Subscriber.FirstName\*|, there's an easier way to get emergency bill assistance

Get Started

**Need emergency bill assistance this winter?** The application process just got easier.

FirstEnergy will work with you to apply for the **Low-Income Home Energy Assistance Program (LIHEAP)**. This program offers financial assistance to ensure you and your family stay warm and avoid disconnection.

**If eligible, you could receive a one-time emergency payment up to \$1000.**

### **Assistance made easy**

Applying for bill assistance shouldn't be time-consuming or complicated. Let FirstEnergy apply for LIHEAP on your behalf.

*This link is available for a limited time.*

Yes, Help Me Apply

**FirstEnergy**

Mid-Ed • Panalco • Penn Power • West Penn Power

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# Having Trouble Paying Your Electric Bill? HELP IS AVAILABLE

(Tiene problemas para pagar su facture de electricidad?  
La ayuda esta disponible.)

Depending on the amount of your household income, you could be eligible for our Universal Service (Energy Assistance) Programs. Check the chart below – your GROSS (before taxes) annual household income must be at or below the annual dollar amount for the number of people in your home to qualify:

Number of Household Members	PCAP (150% of Poverty Level) Annual Income	LIHEAP* (150% of Poverty Level) Annual Income	Dollar Energy (250% of Poverty Level) Annual Income
1	\$21,870	\$21,870	\$36,450
2	\$29,580	\$29,580	\$49,300
3	\$37,290	\$37,290	\$62,150
4	\$45,000	\$45,000	\$75,000
5	\$52,710	\$52,710	\$87,850
6	\$60,420	\$60,420	\$100,700
7	\$68,130	\$68,130	\$113,550
8	\$75,840	\$75,840	\$126,400
Each Additional Person Add	\$7,710	\$7,710	\$12,850

\*LIHEAP effective Nov. 1, 2023

To apply for the Pennsylvania Customer Assistance Program (PCAP) and/or the Dollar Energy Fund, call **1-888-282-6816, Monday-Friday 8:00 am to 5:00 pm. To apply for PCAP online visit [dollarenergy.org/myapp](http://dollarenergy.org/myapp).**

You may also apply for the PA LIHEAP Cash and Crisis program which opens in November. To apply, please contact your [local county assistance office](#) or apply online at [compass.state.pa.us](http://compass.state.pa.us).

**For additional information on possible assistance or payment arrangements, please contact your electric company at the number below or visit us at [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist).**

**Para obtener información adicional sobre posibles acuerdos de asistencia o de pago, por favor póngase en contacto con su compañía eléctrica en el número abajo.**

**Met-Ed: 1-800-962-4848**  
**Penelec: 1-800-962-4848**  
**Penn Power: 1-800-774-1674**  
**West Penn Power: 1-800- 736-3404**

Customers eligible for LIHEAP may be eligible for the Pennsylvania Customer Assistance Program (PCAP).

**The program may provide one or all of the following benefits:**

- A monthly credit toward the electric bill
- A monthly credit toward the account balance that is set aside for forgiveness at the initial enrollment
- An opportunity to reduce electricity consumption through our WARM program, which provides energy education and conservation improvements at no cost to you

To apply for PCAP online, visit [dollarenergy.org/myapp](http://dollarenergy.org/myapp)

To apply by phone, please call **888-282-6816**

Monday – Friday 8 a.m. – 5 p.m.



**FirstEnergy**

Met-Ed • Penelec • Penn Power • West Penn Power

# DON'T GET LEFT IN THE COLD

Help is available now.

**Cold weather is on its way – and so are winter heating bills.**

The Low-Income Home Energy Assistance Program (LIHEAP) helps low-income families pay their heating bills. Beginning November 1, 2023, customers in low-income households can apply for the following:

**LIHEAP Cash Program** Provides a payment that is applied directly to a customer's electric account. A past-due notice is not required.

**LIHEAP Crisis Program** Offers grants to help customers avoid having their electric service shut off when overdue bills aren't paid. Electric service can be restored in cases when power is already shut off.

## Estamos para Ayudarle

Se viene el frío, así como las elevadas cuentas de calefacción durante el invierno.

Tenemos disponible ayuda para familias de bajos recursos con sus cuentas de calefacción.

- El Programa de Asistencia de Energía para Hogares de Bajos Ingresos (Low-Income Home Energy Assistance Program o LIHEAP) ayuda a las familias de bajos recursos a pagar sus cuentas de calefacción. Para más información, llame al 1-866-857-7095.
- Los clientes elegibles para el LIHEAP pueden ser elegibles para el Programa de Asistencia al Cliente de Pensilvania (Pennsylvania Customer Assistance Program o PCAP). Para más información sobre el PCAP, comuníquese con Dollar Energy Fund llamando al 1-888-282-6816.

Para solicitar PCAP, llame a Dollar Energy Fund al 1-888-282-6816 Lunes a Viernes de 8 a.m. a 5 p.m.

**To qualify, your annual gross household income must be less than the following amount for the number of people in your home:**

Size of Household	Annual Household Income
1 person	21,870
2 persons	29,580
3 persons	37,290
4 persons	45,000
5 persons	52,710
6 persons	60,420
7 persons	68,130
8 persons	75,840

For households with more than eight people, add \$7,710 for each additional member.

## Funds available through the program are limited.

To apply, you will need a recent electric bill and the following information for **every person living in the home:**

- Name
- Birthdate
- Social Security Number
- Proof of Income

Eligible customers may contact the local County Assistance Office or request an application by calling the LIHEAP hotline at **866-857-7095**. Customers with hearing or speech impairments please dial 711.

LIHEAP benefits are limited to a maximum of \$1,000 for the CASH program and \$1,000 for CRISIS.

## Save time – Apply online

By using COMPASS, you can apply for LIHEAP at any time from any location with internet access. Apply at **compass.state.pa.us**.

For more information about bill assistance programs or to find out if you may qualify, visit **firstenergycorp.com/billassist** and click on “**Search Assistance Programs**.”



### **PCAP SCRIPT**

Hello, this <OpCo> with some important information that may help you pay your electric bill. The Pennsylvania Customer Assistance Program, PCAP, is currently available to eligible customers and could provide a monthly credit, account balance forgiveness and/or an opportunity to reduce your electricity use through energy education and conservation. The Dollar Energy Fund administers the program for <OpCo> and has representatives available to help determine eligibility and process your enrollment if qualified. To speak to a representative, please call 1-888-282-6816, Monday through Thursday from 8am to 8pm and Friday 8am to 6pm. You will be asked to provide information about your household members and income to determine eligibility. To hear the message again, press 2. Thank you.

# FirstEnergy Pennsylvania Utilities Encourage Customers to Arrange Payment Plans and Apply for Bill Assistance Programs



Feedback

## *Programs can help alleviate growing balances for customers having financial difficulty*

GREENSBURG, Pa., Jan. 17, 2023 – Residential customers of Penelec, Penn Power, Met-Ed and West Penn Power, subsidiaries of FirstEnergy Corp. (NYSE: FE), who are having difficulty making ends meet are encouraged to contact their utility now to enroll in payment plans or to receive referrals for bill assistance programs.

"Many of our customers continue to face financial challenges brought on by the pandemic and ongoing economic uncertainty," said Scott Wyman, president of Pennsylvania Operations for FirstEnergy. "With winter in full swing, I encourage customers who have fallen behind on their bills to contact us as soon as possible so that a member of our team can review their options with them."

Programs customers may be eligible to participate in include:

- **The Pennsylvania Customer Assistance Program (PCAP):** Helps residential customers maintain electric service through debt forgiveness and percentage of income payment plans. This program is administered through the Dollar Energy Fund. To apply, call 1-800-282-6816 or visit <https://www.dollarenergy.org/myapp/>.
- **The Low Income Home Energy Assistance Program (LIHEAP):** This program is administered by PA Department of Human Services and can provide payment directly to the utility company to help with heating bills or to help maintain or restore service. The program opened November 1, 2022. To apply, call 1-866-857-7095 or visit [www.compass.state.pa.us](http://www.compass.state.pa.us).

- **The Dollar Energy Fund (DEF):** This is an emergency hardship fund designed to help customers who have suffered a recent financial hardship. It can provide payment directly to the utility company to help maintain or restore service. The fund began accepting applications on October 1, 2022. To apply, visit [www.dollarenergy.org/need-help/application-process](http://www.dollarenergy.org/need-help/application-process) or call 1-800-683-7036.
- **2-1-1 Helpline:** This nationwide resource and information helpline identifies locally available programs that may assist customers with utility bills or other needs. For more information dial 2-1-1, text your ZIP code to 898211 or visit the [2-1-1 website](#).
- **Emergency Rental Assistance Program (ERAP):** This program provides assistance to households that have experienced financial hardship and may be at risk for homelessness due to or during the pandemic. ERAP provides tenant households assistance with rental and utility costs to include arrearages and other related housing expenses. Visit [www.compass.state.pa.us](http://www.compass.state.pa.us) for more information.
- **Pennsylvania Homeowner Assistance Fund (PAHAF):** This program provides financial assistance to Pennsylvania homeowners who are facing financial hardship due to the Covid-19 pandemic. It provides financial assistance to homeowners for qualified mortgage and housing-related expenses to address delinquency and avoid default, foreclosure or displacement. Visit [www.phfa.org](http://www.phfa.org) for more information.

For a complete list of assistance programs for which customers may be eligible, including installment payment plans and budget billing, please visit [www.firstenergycorp.com/billassist](http://www.firstenergycorp.com/billassist) or call customer service:

Met-Ed 1-800-545-7741

Penelec 1-800-545-7741

Penn Power 1-800-720-3600

West Penn Power 1-800-686-0021

Met-Ed serves about 580,000 customers within 3,300 square miles of eastern and southeastern Pennsylvania. Follow Met-Ed on Twitter [@Met\\_Ed](#) and on Facebook at [www.facebook.com/MetEdElectric](http://www.facebook.com/MetEdElectric).

Penelec serves approximately 585,000 customers within 17,600 square miles of northern and central Pennsylvania. Follow Penelec on Twitter [@Penelec](#) and on Facebook at [www.facebook.com/PenelecElectric](http://www.facebook.com/PenelecElectric).

Penn Power serves more than 160,000 customers in all or parts of Allegheny, Beaver, Butler, Crawford, Lawrence and Mercer counties in western Pennsylvania. Follow Penn Power on Twitter [@Penn\\_Power](#), on Facebook at [www.facebook.com/PennPower](http://www.facebook.com/PennPower), and online at [www.pennpower.com](http://www.pennpower.com).

West Penn Power serves approximately 725,000 customers in 24 counties in central and southwestern Pennsylvania. Follow West Penn Power on Twitter [@W\\_Penn\\_Power](#) and on Facebook at [www.facebook.com/WestPennPower](http://www.facebook.com/WestPennPower).

FirstEnergy is dedicated to integrity, safety, reliability and operational excellence. Its 10 electric distribution companies form one of the nation's largest investor-owned electric systems, serving customers in Ohio, Pennsylvania, New Jersey, West Virginia, Maryland and New York. The company's transmission subsidiaries operate approximately 24,000 miles of transmission lines that connect the Midwest and Mid-Atlantic regions. Follow FirstEnergy online at [www.firstenergycorp.com](http://www.firstenergycorp.com). Follow FirstEnergy on Twitter: [@FirstEnergyCorp](#).

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January 23, 2023



**IMPORTANT PROGRAM INFORMATION**

Account Number: [REDACTED]

Dear [REDACTED]

On 12/20/2022, your account was removed from West Penn Power's Pennsylvania Customer Assistance Program (PCAP). This was because your average monthly electric bill is too low for you to receive a monthly PCAP credit and you do not have a balance eligible for forgiveness.

If your situation changes and you would like to apply again, please contact Dollar Energy Fund at 888-282-6816. Dollar Energy Fund will advise if you are eligible for PCAP.

There are additional programs available to help with heating costs or payment of your bill, such as LIHEAP or other assistance programs from the Dollar Energy Fund. For more information about other programs or to find out if you qualify, visit [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) and click on "Search Assistance Programs."

If you have questions regarding your account, please call West Penn Power at 800-686-0021.

Sincerely,

West Penn Power, A FirstEnergy Company

Su cuenta fue removida del Programa de Asistencia al Cliente de Pennsylvania (PCAP) de West Penn Power. Después de una revisión, el monto promedio de su cuenta mensual de electricidad es demasiado bajo para que usted reciba un crédito mensual PCAP y usted no tiene un saldo que califique para condonación de deuda. Si su situación cambia y deseara volver a presentar una solicitud, por favor comuníquese con Dollar Energy Fund al 888-282-6816.

Dear PCAP Customer,

The PCAP program is designed to help make your electric bill more affordable. As a requirement of the program, you have been billed on the Equal Payment Plan (EPP), or budget billing. With the EPP, you pay approximately the same amount each month, helping to avoid seasonal high and low bills.

If eligible, your monthly PCAP credit will be subtracted from your monthly EPP amount. The amount of the credit can change each month based on your usage.

$$\text{EPP amount} - \text{PCAP credit amount} = \text{Amount you owe}$$

Every 12 months, the amount you paid is compared to the cost of the electricity you used, and if you have a balance, you will receive a subsidy credit to cover the difference.

You can further reduce your electric bill by conserving energy. Our goal is to provide you energy conservation material to help you manage your energy usage and make your bill more affordable. Please see the enclosed brochure, "Understanding Electricity Use & Cost."

Please read the brochure carefully and take advantage of the information when and where you can. For additional information regarding assistance, please visit [www.firstenergycorp.com/billassist](http://www.firstenergycorp.com/billassist) or call your utility at:

Met-Ed and Penelec – 800-545-7741

West Penn Power – 800-686-0021

Penn Power – 800-720-3600

Thank you.

Sincerely,

FirstEnergy Human Services Department

NAME: \_\_\_\_\_ ACCOUNT NO: \_\_\_\_\_

Our goal is to provide you energy conservation material to help you manage your energy usage and make your bill more affordable. Please help us understand any new challenges your household may have regarding energy conservation by checking any box below that applies:

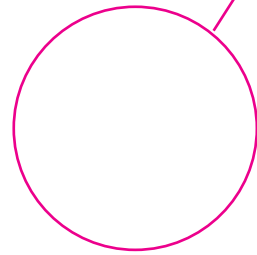
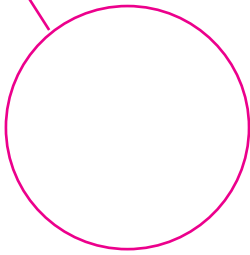
- Additional family member(s) have joined household
- Household has experienced serious illness
- Household requires updates to windows/heating/insulation/etc.
- Home is not structurally sound or does not have adequate utilities

Thank you for your feedback.

Sincerely,

*FirstEnergy Human Services Department*

**FirstEnergy**<sup>®</sup>



**FirstEnergy**  
Met-Ed • Penelec • Penn Power • West Penn Power

*Like a Bridge Over Troubled Water*  
**Pennsylvania Assistance Programs Are Here**

There are several programs around the state of Pennsylvania that help income-eligible customers bridge the gap until they're back on their feet. Below are a few that may benefit you or someone you know.

**Dollar Energy Fund (DEF)**  
*Year-round application period while funds are available*  
DEF is an emergency hardship fund which helps residential customers pay their electric bill after all other assistance has been exhausted. Income guidelines apply. To find an agency near you, please visit [www.hardshiptools.org/AgencyFinder.aspx](http://www.hardshiptools.org/AgencyFinder.aspx).

**Pennsylvania Customer Assistance Program (PCAP)**  
*Year-round application period*  
PCAP, administered by Dollar Energy Fund, helps residential customers maintain electric service and eliminate their past-due balance by offering a reduced bill that is based on a percentage of income and debt forgiveness. No payment is required to re-enroll. Contact DEF at 1-888-282-6816 (press option 3) or visit [dollarenergy.org/MyApp](http://dollarenergy.org/MyApp).

**Low Income Home Energy Assistance Program (LIHEAP)**

*Year-round application period*  
LIHEAP CASH and CRISIS programs assist income-eligible customers in meeting the costs of home heating and or past due bills. To apply for regular LIHEAP apply online at [www.compass.state.pa.us](http://www.compass.state.pa.us) or request an application by calling the Statewide LIHEAP Hotline at 1-866-857-7095/ PA Relay at 711 for the hearing impaired.

**WARM Program- Low Income Usage Reduction Program (LIURP)**

*Year-round application period*  
The WARM Program can help customers lower their electric bill and keep their home more comfortable all year round. No payment is required for these services. Contact DEF at 1-888-282-6816 or visit [www.EnergySavePA.com](http://www.EnergySavePA.com).

**211 Helpline**  
For more information about finding programs in your area, call 211, visit [www.211.org](http://www.211.org) or text your zip code to 898211. This nationwide resource and information helpline will identify programs in your area that may assist you or someone you know with utility bills.

**Additional Information**  
For more information on available programs please visit [www.firstenergycorp.com/billassist](http://www.firstenergycorp.com/billassist) and select Search Assistance Programs.

Follow us on Facebook and Twitter for the latest news and information about managing your electric service.

# WARM Program Agreement

## WARM Program

You may have tenants in your building(s) who qualify for the WARM energy conservation program. This program can benefit you and your tenant(s) by providing qualifying residents with energy conservation measures such as attic and wall insulation, caulking and weather stripping, energy-saving light bulbs, and reflective window tint. Participants may be eligible for the replacement of items such as a leaking water heater, an inefficient refrigerator, freezer and window air conditioner. The program also provides materials about ways to conserve energy. You will benefit by having a more energy efficient building, and most work is guaranteed for a year at no cost to the owner or the tenant for program services or installations.

You have the option of having the building(s) evaluated for possible installation of all WARM measures as mentioned above. Or you can choose to only have minimum measures performed such as energy-saving light bulbs and replacement of an inefficient refrigerator/freezer.

Please check the box below for the measures that you would like completed at your building(s).

- I would like my building(s) to be considered for all measures that may be available through the WARM program.
- I would like to have only minimum measures performed at my building(s).
- I do not wish to participate in the WARM program.

As landlord and owner, I understand FirstEnergy Companies' contractor may be testing the refrigerator/freezer for energy efficiency. If it is not efficient, FirstEnergy Companies will dispose of and recycle the unit and replace it with a new energy-efficient model. Please note that the guidelines of the WARM program state that the old appliance(s) cannot remain with the tenant or the landlord. **If you own the refrigerator/freezer at the time of replacement, you will own the new refrigerator/freezer.**

- |   |                              |                             |
|---|------------------------------|-----------------------------|
| Do you own the refrigerator at the below address?                                       | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Do you want the refrigerator tested and possibly replaced?                              | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Do you own the freezer at the below address?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Do you want the freezer tested and possibly replaced?                                   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Is your building participating in any Government programs such as HUD, Section 8, etc.? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

I, \_\_\_\_\_ Owner(s) or Landlord(s) of the property at

where there are tenant(s), \_\_\_\_\_ who may qualify for energy conservation improvements, agree to permit FirstEnergy Companies to have its authorized contractors perform an energy conservation evaluation and install and inspect the conservation improvements under the terms of the WARM program. No payment will be required for the conservation improvements by the applicant, owner, or landlord. I hereby release FirstEnergy Companies, its officers, agents, and employees from any liability for personal injuries and/or damage, which could occur in connection with any of the materials installed or work performed.

Landlord Name (Please Print): \_\_\_\_\_

Landlord/Manager Address: \_\_\_\_\_

Landlord/Manager Phone Number: \_\_\_\_\_

Landlord/Manager Signature: \_\_\_\_\_

**For questions about WARM, call us at 1-888-406-8074. Return completed form via one of the options below:**

*Met-Ed, Penelec & Penn Power customers:*  
FirstEnergy Corp.  
Attn: Human Services  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-9977

*West Penn Power customers:*  
FirstEnergy Corp.  
Attn: Energy Conservation Dept.  
800 Cabin Hill Drive, M043  
Greensburg, PA 15650

You may also email the application to **pawarm@firstenergycorp.com**, or **fax to 1-800-589-8265**. Please fax all items individually. A coversheet is not required.  
Por favor llame al 1-888-406-8074 para recibir esta solicitud en español.

# WARM Program Application

## WARM Program

Customer Name: _____ <small>(on your electric bill)</small>	Day Phone: _____
Account Number: _____ <small>(on your electric bill)</small>	Evening Phone: _____
Address: _____	
City / State / ZIP: _____	

<input type="checkbox"/> <b>Gas Utility Referral</b> I am interested in hearing more about weatherization assistance through my Gas Utility. I request that FirstEnergy provide my name, address, phone number and Gas account number for possible follow up.  Company Name: _____ <small>(on your gas bill)</small>  Customer Name: _____ <small>(on your gas bill)</small>  Account Number: _____ <small>(on your gas bill)</small>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Your Household Size</th> <th style="text-align: center;">Maximum Yearly Household Income Before Taxes</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">1</td><td style="text-align: center;">\$29,160</td></tr> <tr><td style="text-align: center;">2</td><td style="text-align: center;">\$39,440</td></tr> <tr><td style="text-align: center;">3</td><td style="text-align: center;">\$49,720</td></tr> <tr><td style="text-align: center;">4</td><td style="text-align: center;">\$60,000</td></tr> <tr><td style="text-align: center;">5</td><td style="text-align: center;">\$70,280</td></tr> <tr><td style="text-align: center;">6</td><td style="text-align: center;">\$80,560</td></tr> <tr><td style="text-align: center;">7</td><td style="text-align: center;">\$90,840</td></tr> <tr><td style="text-align: center;">8</td><td style="text-align: center;">\$101,120</td></tr> <tr> <td colspan="2" style="text-align: center;"><i>(For each additional person, add \$10,280)</i></td> </tr> </tbody> </table>	Your Household Size	Maximum Yearly Household Income Before Taxes	1	\$29,160	2	\$39,440	3	\$49,720	4	\$60,000	5	\$70,280	6	\$80,560	7	\$90,840	8	\$101,120	<i>(For each additional person, add \$10,280)</i>	
Your Household Size	Maximum Yearly Household Income Before Taxes																				
1	\$29,160																				
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6	\$80,560																				
7	\$90,840																				
8	\$101,120																				
<i>(For each additional person, add \$10,280)</i>																					

If you are interested in hearing more about Pennsylvania's Weatherization Assistance Program (WAP), please contact the Pennsylvania Department of Community and Economic Development (DCED) at 1-866-466-3972.

I certify that the total number of people in the household is \_\_\_\_\_

I certify that the total household income for the last 12 months was \$\_\_\_\_\_

Do you rent or own your home?     Rent                       Own

Electric Heat?                             Yes                             No

Electric Hot Water Heater?             Yes                             No

Who owns the refrigerator?            Tenant                         Owner

Who owns the freezer?                  Tenant                         Owner

Landlord's Name: \_\_\_\_\_

Landlord's Phone: \_\_\_\_\_

Landlord's Address: \_\_\_\_\_

INTERNAL USE ONLY

As a participant in the WARM program, I give you permission to do the following 1) share my household records with all parties planning to do work on my home or evaluating how much energy is being saved by that work 2) use, at no charge, any description or pictures relating to the work performed at my home and 3) have reasonable access to my home to inspect the work performed by the weatherization contractor.

---

**Customer Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**For questions about WARM, call us at 1-888-406-8074. Return completed form via one of the options below:**

<p><i>Met-Ed, Penelec, West Penn Power &amp; Penn Power customers:</i>                  FirstEnergy Corp.                  Attn: Human Services                  2800 Pottsville Pike                  P.O. Box 16001                  Reading, PA 19612-9977</p>	<p>You may also email the application to <b>pawarm@firstenergycorp.com</b>, or <b>fax to 1-800-589-8265</b>. Please fax all items individually. A coversheet is not required.                  Por favor llame al 1-888-406-8074 para recibir esta solicitud en español.</p>
---	--



**FirstEnergy and YOU  
Working Side-by-Side to Save on Electric Bills and Use Energy Efficiently**

**OUR ENERGY CONSERVATION PARTNERSHIP AGREEMENT**

NAME(S)

Will be partners with FirstEnergy in reducing my electric bill and using energy wisely.

**FirstEnergy WILL PROVIDE AT NO COST TO US:**

- An in-home assessment/energy audit and education session to begin understanding our needs and selecting energy saving measures to meet those needs.
- Installation of customized comfort, health, safety and energy saving measures guaranteed for one year.
- A customized plan to help increase our success at saving electricity.

**WE WILL:**

- Keep all scheduled appointments and if an emergency arises that requires re-scheduling, call contractor/agency below:  
Contractor/Agency: \_\_\_\_\_ Phone: \_\_\_\_\_
- Participate actively with The FirstEnergy Energy Conservation partners to discover ways we can increase home comfort, health and safety, and reduce our energy costs from \$ \_\_\_\_\_ paid last year for \_\_\_\_\_ KWH.
- Plan to take personal and family actions to save energy. Goal: Reduce my bills by \$ \_\_\_\_\_/Month.
- Maintain and use installed energy-saving measures.

COMMENTS

We hereby release FirstEnergy Pennsylvania Operating Companies, its officers, agents and employees, from any liability for personal injuries and/or personal damage, which could occur in connection with any of the materials installed or work performed.

FAMILY PARTNER SIGNATURE	DATE
FIRSTENERGY PARTNER SIGNATURE	DATE

**COPY DISTRIBUTION: WHITE** – Customer; **YELLOW** – Contractor/FirstEnergy

**OUR ENERGY SAVINGS STRATEGY**

FORM X- 2820 (REV. 11-16)



**ATTACHMENT G**

Met-Ed  
Penelec  
Penn Power  
West Penn Power  
FirstEnergy Companies

FAMILY PARTNER ACTIONS	BENEFITS AND SAVINGS POTENTIAL
HOW AM I GOING TO SAVE ENERGY AND MONEY?	
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.
6.	6.
7.	7.
8.	8.
9.	9.
10.	10.

FirstEnergy CONTRACTOR'S ACTIONS AND MEASURES	BENEFITS AND SAVINGS POTENTIAL
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.
6.	6.
7.	7.
8.	8.
9.	9.
10.	10.

- We have reviewed, measured, compared benefits and costs, and agree on these savings strategies.
- If FirstEnergy completes any air sealing or insulation work in our home, we agree not to use any unvented combustion space heaters. If we currently use any unvented combustion space heaters in our home, we will read and sign the FirstEnergy "Weatherization Release" form.
- We understand that if the blower door test reveals that our home may be so tight that we may not have enough fresh air to maintain good health, we will read and sign the FirstEnergy "Air Tight Home" handout.

FAMILY PARTNER SIGNATURE	CUSTOMER ACCOUNT NO.	DATE
FirstEnergy PARTNER SIGNATURE		DATE

**COPY DISTRIBUTION: WHITE** – Customer; **CANARY** – Contractor/FirstEnergy

Customer (last, first):		
Address:	<input type="checkbox"/> Owner	<input type="checkbox"/> Renter
City, State, ZIP:	County:	
Home phone:	Cell Phone:	Other Phone:

*Be advised that during the inspections and performance diagnostics performed on your home we have found a health and safety condition(s) that will require repair prior to any measures or services being performed that will improve the air leakage rates or insulation levels of your home.*

**Health and safety issues that are a barrier to receiving energy improvements**

1.  Gas leak(s) (potential explosive condition may develop)  You should report this leak immediately  Reported to gas utility  
Location: \_\_\_\_\_ Action/note: \_\_\_\_\_
2.  High ambient carbon monoxide (CO) levels found in the home (elevated levels can cause illness or death)  
Location: \_\_\_\_\_ Action/note: \_\_\_\_\_
3.  Combustion appliances not properly venting gases to outside (CO & moisture entering your home poses a serious safety issue)  
Location:  Furnace/boiler  Water heater  Space heater  In your home/unit  In another unit in the building  
Action/note: \_\_\_\_\_
4.  High CO level in combustion appliances:  
Location:  Furnace  Boiler  Water heater  Stove/oven  Other: \_\_\_\_\_  
 In your home/unit  In another unit in the building  
Action/note: \_\_\_\_\_
5. Uncontrolled moisture condition:  Mold may develop  What appears to be mold is visibly present  
Location:  Basement  Bathroom  Kitchen  Living area  Bedroom  Roof assembly  
 In your home/unit  In another unit in the building  
Potential sources:  Roof leak  Improper spot ventilation (bath/kitchen)  Improper dryer venting  
 Exterior grading  Ground water  Gutters/downspouts  Foundation issues  
Action/note: \_\_\_\_\_
6. Unsafe electrical wiring:  Knob & tube wiring needs to be checked  Open electrical boxes  Other: \_\_\_\_\_
7. Other issues:  Infestation  Structural issues  Other: \_\_\_\_\_  
Action/note: \_\_\_\_\_

*The above condition(s) were observed during a limited inspection process during an energy conservation audit of the home. No guarantee is being made or implied that all such conditions have been fully verified during this limited inspection.*

*I understand that I am responsible to have the condition(s), checked above, corrected prior to coordinating any building air sealing or insulation work being performed that would alter the home's air tightness or thermal performance. I understand the potential hazard(s) associated with the condition(s). I understand that my participation in the FirstEnergy energy conservation program WILL NOT continue until the condition(s) have been corrected. When the condition(s) have been corrected within \_\_\_\_\_ days from the date this form is signed (no later than date: \_\_\_\_\_), contact us at \_\_\_\_\_. We will then schedule a re-inspection (or testing) of your home to determine if the program can proceed with air sealing and/or insulation measures at that time.*

I hereby agree to release Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, along with their affiliated companies (collectively, "FirstEnergy") from any damages arising out of any tort, injury or death arising out of any health and safety issues listed above.

Family partner signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Potential Corrective Actions** **Health and Safety Issue # (circle)**

- |  |                     |
|--|---------------------|
| <input type="checkbox"/> A contractor may inspect and report to our administrators the potential corrective action at <b>no cost</b> to you. | Re #: 1 2 3 4 5 6 7 |
| <input type="checkbox"/> The conditions in your home are beyond the scope of the program and will need to be repaired.                       | Re #: 1 2 3 4 5 6 7 |
| <input type="checkbox"/> You will need to inform your landlord to make the necessary repairs.  | Re #: 1 2 3 4 5 6 7 |
| <input type="checkbox"/> Check here if you would like us to inform your landlord of the situation found at your home.                        | Re #: 1 2 3 4 5 6 7 |

Landlord name: \_\_\_\_\_ Phone: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

**Additional Resources**

*Listed below are some local agencies that may be of assistance in correcting the Health and Safety conditions found in your home. You will need to communicate with them directly to determine if they have assistance funds or options to address the conditions.*

- \_\_\_\_\_
- \_\_\_\_\_



**Joint Universal Service &  
Energy Conservation Plan**

**Program Years 2024-2028**

**Metropolitan Edison Company  
Pennsylvania Electric Company  
Pennsylvania Power Company  
West Penn Power Company**



**November 1, 2022**

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## Introduction

Metropolitan Edison Company's ("Met-Ed") Pennsylvania Electric Company's ("Penelec"), Pennsylvania Power Company's ("Penn Power"), and West Penn Power Company's ("West Penn") (individually referred to as "Company" or collectively referred to as the "Companies") Joint 2024 - 2028 Universal Service and Energy Conservation Plan ("USECP") is provided to the Pennsylvania Public Utility Commission ("Commission") in accordance with Universal Service and Energy Conservation Reporting Requirements at 52 Pa. Code §§ 54.71-54.78 and the 2019 Amendments to the Policy Statement on Customer Assistance Programs ("CAP Policy Statement"), 52 Pa. Code §§ 69.261–69.267.

The Companies are committed to providing customer-focused, quality-driven, results-oriented Universal Service and Energy Conservation Programs<sup>1</sup> in a cost-effective and holistic manner.

The goals of the Companies' Universal Service and Energy Conservation Programs are to:

- Protect consumers' health and safety by helping low-income customers maintain affordable utility service
- Provide for affordable utility service by making available payment assistance to low-income customers
- Help low-income customers conserve energy and reduce residential utility bills
- Ensure Universal Service and Energy Conservation Programs are operated in a cost-effective and efficient manner

The Companies will continue to work with eligible customers in establishing affordable payment agreements that maintain electric service and move them toward self-sufficiency in paying their electric bill.

Beginning in 2017, the Companies established a Universal Service Advisory Committee ("USAC") comprising representatives from the Companies, the Pennsylvania Office of Consumer Advocate ("OCA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Commission's Bureau of Investigation and Enforcement ("BI&E"), the Commission's Bureau of Consumer Service ("BCS") and the organizations that administer the Companies' USECP, which holds meetings at least twice a year with respect to the Companies' USECP programs.<sup>2</sup> The USAC's purpose is to explore opportunities for enhancements to the Companies' USECP programs, as well as opportunities for outreach and education, language access, notification to low-income customers regarding topics of interest, including security deposit waivers and bill clarity. At the Companies' sole

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<sup>1</sup> As defined in Section 2803 of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2803, "universal service and energy conservation" refers to those "policies, protections and services that help low-income customers to maintain electric service. The term includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education."

<sup>2</sup> The USAC was a product of the Companies' 2016 base rate cases. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa. Pub. Util. Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017).

discretion, process or program changes raised through the USAC may be filed for approval at the Commission as proposed revisions to the Companies' USECP on a case-by-case basis.

Additionally, the Companies meet with a WARM advisory panel to further explore opportunities to achieve the energy conservation program goals. The members of the panel are as follows:

WARM Advisory Panel Members - Statewide

ACTION-Housing	Pittsburgh
CLEARresult	Lancaster
Honeywell	Raleigh, NC
MT Weatherization	Hummelstown
Northwest PA Weatherization	Meadville
Performance Systems Development	Ithaca, NY
Solaire Energy, Inc.	Canton
South Central Community Action Programs	Gettysburg

Consumer Group Representation

Pennsylvania Utility Law Project  
Community Legal Services of Philadelphia  
Office of Consumer Advocate

Regulatory Representation

Bureau of Consumer Services

All costs associated with each Company's USECP are funded through the Company's Universal Service Cost Rider.

This plan describes the Companies' portfolio of USECP programs for program years 2024-2028. To align the Companies' low-income program, Pennsylvania Customer Assistance Program ("PCAP"), with the 2019 Amended CAP Policy Statement, PCAP will no longer be a fixed credit program. The core changes are as follows:

- Fixed monthly credits and associated recalculations will be eliminated.
- The monthly bill will be based on a percentage of income-payment ("PIP") established by heat type and federal poverty level, with a minimum bill component. Accounts will not be on the equal payment plan ("EPP") or experience 'true-ups.'
- Subsidy maximums will be eliminated to help ensure customers' bills maintain affordability and align with the percentage of income guidelines based on federal poverty levels and heat type as they are defined in the CAP Policy Statement.
- Recertification periods will be lengthened as defined in the CAP Policy Statement.
- Participants will no longer be graduated or denied enrollment due to low energy burdens. Participants that do not receive monthly credits or forgiveness credits from PCAP may receive other benefits associated with being on the program.

In order to implement, programming changes are required. Due to this programming effort, it will be necessary to remove PCAP participants from the EPP approximately three months prior to the actual conversion date of the new program logic. This change will impact the monthly amount billed to PCAP participants and new

enrollments during this period. As a result, the Companies will stop collection activities for active participants from the effective date of the EPP removal until the conversion date. At conversion, all unpaid balances will become preprogram arrears which will be subject to arrears forgiveness credits. Customers will not be eligible for retroactive credits until a removal for failure to reverify or failure to participate in WARM has been processed under the new program. Customers will be notified by mail in advance of changes being made to their account. The communication will include an explanation of the change being made, who to contact with questions, and an overview of the upcoming program changes. A second communication will be mailed when the new program is implemented which announces the program change, defines changes to the bill statement, and explains program benefits.

The Companies are committed to rolling out the proposed modifications to the USECP as expeditiously as possible. However, the Companies' USECP approved on July 11, 2019 will continue to govern until the revisions herein are approved and the necessary information technology changes associated with the program are implemented.

## **CARES**

### **Overview and Objectives**

The CARES program provides assistance on a short-term basis to payment-troubled residential customers. Based upon the circumstances of each customer, the CARES representatives make referrals to social service agencies and provide information on appropriate Company and/or external programs. Many CARES referrals are subsequently enrolled into PCAP.

CARES supports community outreach events, such as the annual Be Utility Wise events sponsored by the Commission, annual hardship fund fundraisers, and senior fairs.

### **Eligibility**

Any customer experiencing a recent hardship such as:

- Serious illness or injury to a member of a household
- Death of a wage earner
- Marital or family problems
- Handicapped or disabled person
- Sudden loss of income to the household
- Any customer 60 years of age or over requiring special assistance

### **Tracking**

When tracking CARES referrals, basic account information is documented for the actions taken in response to the customers' situations.

### **CARES Organizational Structure**

A portion of the following employees' time supports this program:<sup>3</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

---

<sup>3</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## Dollar Energy Fund

### Overview and Objectives

The Dollar Energy Fund ("Fund") is an emergency hardship fund designed to help residential customers who have suffered a recent financial hardship and need temporary help in paying their electric bill. The bulk of program funding is provided by contributions from the Companies' stockholders, employees, customers, and the Dollar Energy Fund. The application for funds is processed by the Dollar Energy Fund.

### Dates of Operation

The Fund accepts applications in accordance with pre-established account status guidelines, or if funds remain available. Program dates are as follows:

Period	Account Status
October 1 – November 30	Service Terminated or Pending Termination
December 1 – January 31	Service Terminated
February 1 – February 28	Service Terminated or Pending Termination
March 1 – September 30	Open to All Non-PCAP Customers  PCAP customers with Pending Termination or Service Terminated are also eligible  As the availability of funds reduces during this period, account status is subject to change until the program is closed based on priority: Service Terminated or Pending Termination, Service Terminated, or Closed.

### Maximum Grant Amount

One maximum grant of \$500 may be awarded to a customer during a program year.

### Contacts and Administering Agencies

The Companies' contact person is:

Leonard Howell, FirstEnergy Corp., 5001 Nasa Blvd, Fairmont, WV 26554  
Telephone: 681-753-5518; Email: lhowell@firstenergycorp.com

The Dollar Energy Fund contact person is:

Chad Quinn, Chief Executive Officer, The Dollar Energy Fund, Inc.,  
P. O. Box 42329, Pittsburgh, PA15203-0329  
Telephone: 412-390-3863; Email: cquinn@dollarenergy.org

## Eligibility Guidelines

- The residence must be a residential single home or apartment.
- The name on the account must be an adult resident.
  - Residency exception will be made for ratepayers assigned to active military duty.
- The applicant must provide income information.
  - Total household income (gross) must be at or below 250% of the Federal Poverty Income Guidelines (“FPIG”).
  - Exceptions will be made based on circumstances.
- The customer must have paid a minimum of \$150 on their account within the past 90 days or a minimum of \$100 if age 62 and over.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.
- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Companies’ reserve the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

## Dollar Energy Fund Organizational Structure

A portion of the following employees’ time supports this program.<sup>4</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services-Universal Service  
Business Analyst (2) – Various Levels  
Customer Accounting Associate (2) – Various Levels

---

<sup>4</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

**Needs Assessments for Hardship Fund:**

The Hardship Fund Needs Assessment is based on income levels at or below 250% FPIG for all active residential accounts in arrears greater than 30 days at year end.

<b>Met-Ed Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	2,887	2,409
151% - 200%	5,039	4,159
≤ 150%	29,406	23,475
<b>Total</b>	<b>37,332</b>	<b>30,043</b>

<b>Penelec Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	2,864	2,474
151% - 200%	5,400	4,379
≤ 150%	35,311	28,569
<b>Total</b>	<b>43,575</b>	<b>35,422</b>

<b>Penn Power Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	675	594
151% - 200%	1,278	1,107
≤ 150%	7,885	6,788
<b>Total</b>	<b>9,828</b>	<b>8,489</b>

<b>West Penn Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	3,171	2,621
151% - 200%	5,796	4,530
≤ 150%	33,367	26,406
<b>Total</b>	<b>42,334</b>	<b>33,557</b>

## **Gatekeeper Program**

### **Overview and Objectives**

Gatekeeper is a program where Company field personnel recognize and report customers who may be in "distress" as described below.

### **Eligibility Guidelines**

Situations include, but are not limited to, the following:

- Communication – A person who appears confused or disoriented
- Economic Condition – Someone expresses difficulty with paying bills
- Social Condition – Older persons living alone or socially isolated
- Physical Limitations – Severe difficulty seeing, speaking, hearing, or moving about
- Condition of Home – In need of repair, neglected yard, accumulation of newspapers, offensive odors, or unattended pets

### **Gatekeeper Organizational Structure**

A portion of the following employees' time supports this program.<sup>5</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

---

<sup>5</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## PCAP

### Overview and Objectives

PCAP helps residential customers maintain electric service and eliminate past-due balances. PCAP offers a reduced bill to customers, based on a PIP and debt forgiveness. The objectives of PCAP are to:

- Improve a customer's payment ability and consistency
- Reduce a customer's consumption of electricity
- Eliminate debt

### Eligibility Requirements

- Total gross household income<sup>6</sup> is at or below 150% of FPIG.
- Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial to determine program eligibility.
- The Companies require households reporting zero income to complete a zero-income form. The form is a Commission-approved form that has been modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
  - Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits.
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

### Intake Process

Customers are required to complete an application to apply for PCAP, recertify eligibility, or to re-enroll after being removed from the program or when moving to a different operating company. If a customer final bills as a PCAP participant, the Companies use the following guidance to determine if a final billed PCAP participant is required to complete an application:

---

<sup>6</sup> 66 Pa. C.S. § 1403: Definition of "**Household income.**" The combined gross income of all adults in a residential household who benefit from the public utility service.

- When an active participant moves out of a location, the PCAP program will follow the customer to the new location within the same operating company provided the original recertification date is a future date. PCAP will follow the customer and resume on the new account.
- If a customer is moving to a new location within the same operating company within 12 months of the last move-out date but the original recertification date is expired, PCAP will follow the customer to the new location and the customer will receive notification to complete recertification or be removed from the program within 3 months.
- If a customer is moving to a new location more than 12 months since the last move-out date and the original recertification date is expired, or if the customer is moving from one operating company to another, PCAP will not follow to the new account.

Dollar Energy Fund, Inc. is the current PCAP administrator for the Companies and processes the PCAP applications for new enrollments or recertifications into PCAP. The administrator can educate and assist the customer with referrals to assistance programs, such as WARM, the Dollar Energy Fund grant program or LIHEAP. Customers may apply for the program by contacting Dollar Energy Fund as follows:

- Call 888-282-6816
- Complete an online application at [dollarenergy.org/myapp](http://dollarenergy.org/myapp)

The administrator may also contact participants to initiate a text-to-recertify process. Data rates may apply.

While most applications may be processed by phone or online, the Companies reserve the right to request an in-office appointment. Dollar Energy Fund maintains contracts with other community-based organizations (CBOs) where customers can be directed to complete the application process on an as-needed basis.

During the initial call, customers may be asked to provide all household members' names, Social Security numbers ("SSN"), dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer.

If the SSN is not provided, the customer may submit copies of government issued IDs, such as driver's license, passport, ICE card, or ID from their country of origin, which includes full name, current address, photograph, and expiration date.

The documentation may be submitted by fax, mail, email or online, if an online application is submitted.

Fax: 412-515-1661  
Mail: Dollar Energy Fund, PO Box 42329, Pittsburgh, PA 15203  
Email: [FirstEnergy@DEFDocs.org](mailto:FirstEnergy@DEFDocs.org)  
Online: [dollarenergy.org/myapp](http://dollarenergy.org/myapp)

The completed records are downloaded to the Companies' host SAP system each business day in a single batch process. Upon successful completion of enrollment, the customer is notified by letter. After the initial billing of a new enrollment, communications will be made to the customer to describe the benefits of the program and the bill.

During this plan period, the Companies will be evaluating our intake system and processes for enhancements to provide improvements to the application process and/or submission of income documentation for customers.

**Percentage-of-Income Payment (“PIP”)**

The PIP is based on heat type, income, and federal poverty level.

Federal Poverty Level	Non-electric Heat Type	Electric Heat Type
< 50%	2%	6%
51 - 100%	4%	10%
101 – 150%	4%	10%

The monthly asked-to-pay amount is calculated as:

Monthly income \* % by Heat Type and FPIG = Percentage-of-Income Payment (PIP)

To control program costs and institute minimum payment requirements, the PIP will have a minimum established for customers per month.

Heat Type	Minimum Bill
Non-Electric	\$12
Electric	\$45

Examples:

Monthly income = \$1200  
 FPIG = 51-100%  
 Heat type = Non-electric  
 PIP percentage = 4%  
 $\$1200 * 4\% = \$48$   
 The customer’s monthly PIP is \$48.

Monthly income = \$500  
 FPIG = < 50%  
 Heat type = Non-electric  
 PIP percentage = 2%  
 $\$500 * 2\% = \$10$   
 The calculated PIP is \$10; however, the minimum bill is \$12. The customer’s monthly PIP will be \$12.

PCAP participants will be asked to pay either the percentage-of-income payment or the actual charges each month. If the actual charges are less than the percentage-of-income payment, the customer will be asked to pay the actual charges. If the actual charges are more than the percentage-of-income payment, the customer will be asked to pay the PIP amount and a subsidy credit will apply to the difference.

Examples:

Actual charges = \$100

PIP = \$75

- Customer will receive a \$25 PCAP credit and will be asked to pay \$75.

Actual charges = \$75

PIP = 100

- Customer will not receive a PCAP credit and will be asked to pay \$75.

The PIP will be prorated for bill periods that are less than 26 days.

Based on the changes in this program, quarterly account monitoring becomes unnecessary. The Companies' revised PCAP program will offer one billing method that automatically bills the customer the PIP or the actual charges, whichever is less, making it unnecessary to evaluate the billing method quarterly.

Annually, the Companies will identify participants that had annual usage for the calendar year exceeding 125% of the participant's prior year usage provided the customer resided at the same location during that time. For these participants, the Companies will complete outreach quarterly throughout the following year to provide energy conservation messages when customers are not exempt. All participants are evaluated for the WARM program at enrollment or scheduled recertification. As the Companies schedule WARM jobs with contractors, jobs with the highest usage are prioritized first.

When customers exceed 125% of the historical usage, the account will be reviewed to determine if the account can be identified as exempt from the consumption limits. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household's ability to control.
- The household is located in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

### **Debt Forgiveness Guidelines**

When entering PCAP for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When entering PCAP under the USECP 2024-2028 plan for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When recertifying for PCAP following the first enrollment, additional dollars are not deferred (past due PCAP bills).

For participants removed from PCAP, preprogram debt is due and subject to collection activity. Customers are responsible to pay all charges including preprogram balances.

When re-enrolling into PCAP, all preprogram debt will be deferred and included in the PCAP debt forgiveness component if the initial deferral was \$300 or less. If the initial deferral was more than \$300, only the remaining (not yet forgiven or paid) preprogram debt from the first PCAP enrollment will be re-deferred and included in the PCAP debt forgiveness component. All other past-due, ask-to-pay

amounts on the bill will remain due and subject to collection activity after either re-enrollment or re-certification into the program.

While a participant, debt forgiveness credits (1/12 of preprogram debt) will be awarded retroactively in response to full monthly bills being paid, whenever those payments occur, regardless of PCAP arrears. Debt forgiveness credits will be applied in response to any type of payment or credit, including assistance grants, which paid the bill in full. When awarded, credits are applied at monthly billing. PCAP participants must remain in the Company's standard residential billing cycle (twenty-day due date) for debt forgiveness credits to be awarded by the host computer system.

When the full preprogram debt has been forgiven and they no longer have a preprogram arrearage balance, a customer is no longer eligible for debt forgiveness, but the account will remain in PCAP.

### **Default Provisions**

PCAP customers who fail to make timely bill payments will be subject to the collection cycle.<sup>7</sup>

Dunning notices, including termination notices, will be issued for any unpaid current bills. Deferred preprogram debt balances will not be included in dunning notices. PCAP participants who do not make payments in accordance with the terms of the program will remain in PCAP and be subject to PCAP dunning processes, up to and including service termination. PCAP dunning processes include all the notification and procedural steps required by 52 Pa. Code § Chapter 56.1, *et seq.*, and 66 Pa. C.S. § Chapter 1401, *et seq.* The Companies are compliant with the CAP Policy Statement and initiate collection activity for CAP accounts after no more than two payments are in arrears. Participants are not removed or defaulted from PCAP as a precursor to termination for non-payment.

Payment requirements to avoid termination of service:  
Past due charges are brought current.

Payment requirements for restoration of service following service termination:  
Past due charges are brought current, and  
Reconnection fee per the current tariff is paid.

### **Dismissal from PCAP and Re-entry into PCAP**

Participants may be removed from PCAP for any of the following reasons:

1. Refusing to participate in WARM if eligible (re-entry is dependent on application for the WARM program)
2. Failing to recertify as scheduled, or upon request (re-entry is dependent on completion of re-certification procedures)
3. Theft of service (re-entry prohibited for six months)
4. Other actions deemed to be intentional and fraudulent (re-entry prohibited for six months)
5. Other actions, including but not limited to, failure to permit scheduled meter readings, unreasonable and/or increased consumption post-WARM measures installation, and pattern of

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<sup>7</sup> *Guidelines for Universal Service and Energy Conservation Programs*, Docket No. M-00960890F0010 (Final Order entered Jul. 10, 1997). Under Customer Assistance Programs, Default Provisions: "The Commission believes that the consequences for nonpayment should be loss of service; therefore, we recommend that participants who do not make payments should be returned to the regular collection cycle."

returned check may result in disconnection of service and final billing or removal from the program.

After removal from PCAP, customers may re-apply to PCAP if they resolve the reason for dismissal and meet the eligibility parameters identified above.

Upon re-entry to PCAP (within the same operating company) after removal for failure to recertify income or failure to participate in WARM, customer accounts may receive missed subsidy and/or forgiveness credits for months billed while not in PCAP if the account was removed within the past 12 months. After 12 months of removal, PCAP applicants are no longer eligible for retroactive subsidy and/or forgiveness credits. Any remaining amount will be due by the PCAP participant.

- Missed subsidy credits will not be applied for an amount that exceeds the account balance less remaining unpaid preprogram arrearages and/or miscellaneous fees.
- When a customer removed from PCAP moves from one location to the next within the same operating company, the missed credits will only be applied if the customer enrolls for the first account activated following the final account where PCAP was removed.
- Missed forgiveness credits will not be applied for an amount that exceeds the remaining unpaid preprogram arrearages and is only applied for full monthly bills that were paid.

Customers that re-enroll more than 12 months after removal from the program are not eligible for retroactive forgiveness or subsidy credits. For those customers, only the remaining unpaid preprogram debt will be re-deferred at enrollment for future arrears forgiveness unless the initial balance deferred was less than \$300 as described previously in Debt Forgiveness Guidelines.

Customers removed for any reason other than failure to recertify or failure to participate in WARM are not eligible for retroactive credits at any time.

### **Recertification Requirements**

PCAP participants are advised at the time of application that they are required to recertify eligibility as scheduled or when there is a change in gross household income, household size, or heat source. Customers will be able to recertify over the telephone, online, or by mail. A notice to recertify is mailed to PCAP participants 60 days prior to the benefit end date including information on when benefits will expire and how to complete the recertification process. A message is printed on the participant's electric bill at this time. If necessary, a message is printed on the participant's electric bill 30 days prior to the benefit end date and a reminder letter is mailed. Reminder calls will be placed to the customer at 45 and 15 days prior to the recertification date. If the customer does not successfully complete recertification, the account will be removed from PCAP. Once removed, the customer will receive a letter that explains the account has been removed from PCAP for failure to recertify and provides instructions on how to reapply.

To recertify, PCAP participants will be required to submit the required household income and household member information by U.S. mail, fax, or online, if applying online. Dollar Energy Fund may also contact participants to complete recertification via text message. Data rates may apply.

Completed enrollment or recertification records are transferred to the SAP host system each business day through a batch process, which extends the Benefits End Date based on the income source.

The period for recertification will vary based on income source as follows:

<b>Income Source</b>	<b>Recertification Period</b>
Zero-Income	6 months
SSI, Disability, Pension	3 years
All others	2 years

In addition, when a customer receives LIHEAP benefits, the recertification period may be increased one year provided the recertification period does not exceed 3 years. Completion of a PCAP application is required at least every 3 years. This LIHEAP extension does not apply to customers identified as Zero-Income or participants that already have a 3-year recertification period.

### **Application of Customer Payments and Assistance Grants**

Customer payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

Assistance Grants:

#### LIHEAP

LIHEAP helps eligible customers on low or limited incomes pay their heating bills through energy assistance grants. A customer is not required to have an unpaid bill to receive energy assistance. The Department of Human Services (“DHS”) administers LIHEAP and establishes dates in which LIHEAP is available. Various efforts, such as bill inserts, letters, call campaigns, social media and customer referrals are attempted to encourage customers to pursue LIHEAP funds when available. All eligible customers are encouraged to apply for LIHEAP benefits.

LIHEAP payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation) or in accordance with DHS’ directives stated in the annual LIHEAP State Plans

#### Dollar Energy Fund

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

### **Excess PCAP Credits**

Subsidy credits are not included in refund checks issued to customers. Subsidy credits will be adjusted from the customer’s account balance when:

- The subsidy credit exceeds the total account balance, and a final bill has been issued. If the customer established another account within the same operating company, the excess credits may be transferred to the new account instead.
- The subsidy credit exceeds the total account balance, and the credit has been open for 18 months or more.

### **Program Delivery Partners**

The Companies will continue the use of CBOs referenced in Attachment A for the daily administration of the USECP. The Companies currently contract with Dollar Energy Fund as the administrator for PCAP applications and recertifications, grant applications, and referrals to WARM and other assistance programs. Dollar Energy Fund is a non-profit agency with an established network of CBOs to process intake for assistance programs and grants.

### **Quality Assurance Provisions**

During each calendar year, a representative of the Companies, or their designee, shall audit the PCAP administrator to verify proper administrative processes have been performed in support of the PCAP application and recertification process. The areas of performance to be audited include, but are not limited to:

- Auditor received requested documents
- Case note documented for each customer contact
- Account status document reviewed
- Application completed when applicable
- Recertification completed when applicable
- Referred clients to other program(s) when applicable
- Proper documentation retained
- Hardcopy documentation recorded accurately
- Successfully enrolled clients into PCAP when applicable
- Measure administrator level of service

A combination of applications and recertifications processed by the administrator for the Companies shall be reviewed during an audit. A sample size calculator will be used to identify a statistically significant sample size for the applications and recertifications. With the sample size calculator, the standard variables used will be a confidence level of 95% and a confidence interval of 5%.

Human Services prepares the designee, if any, with program information and reviews the audit expectations. The designee reviews each selected application to confirm the administrator followed the appropriate procedure in the application process. The results are tracked in a spreadsheet and reviewed with the Companies. The Companies and administrator discuss the audit results and coordinate the sharing of information to reinforce training with the administrator's staff and/or identify areas for improvement in workflow processing or technology.

### **Assessment of Security Deposits**

Security deposits are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

## Assessment of Late Payment Charges

Late payment charges are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

## Customer Choice

Per the Commission Order dated August 4, 2022, for the Joint Petition for Partial Settlement of the Default Service Plan<sup>8</sup>, customers enrolled in PCAP may not receive service from an electric generation supplier effective June 1, 2023.

## Consumer Education, Outreach and Referral

As a PCAP participant, customers receive the following communications:

- Enrollment letter
- Recertification letter
- Reminder recertification letter with form, if needed
- Removal letter, if needed
- Quarterly mailings with energy conservation information when participants' usage increased 25% compared to the prior year of service at the same location
- Outbound calls are also completed as part of the recertification process

As a PCAP applicant, customers receive the following outreach:

- Email notifications from Dollar Energy Fund's MyApp online application when income documents are required
- Email notifications 7 days after the MyApp application is started if documentation has not been received
- Outbound calls from the Companies to remind the customer the application is pending required documentation
- Mailed copy of the PCAP agreement when application is submitted

Outreach to promote energy assistance program enrollment to customers 0-50% FPIG and higher is completed as follows:

- Outbound call campaigns in the 1<sup>st</sup> and 4<sup>th</sup> quarter to promote LIHEAP CASH and CRISIS
- Participation in the CRISIS Utility File Transfer (UFT) program
- Participation in the Turn On program, when open
- Outbound call campaigns to promote PCAP enrollment
- Email campaigns to promote PCAP enrollment
- Bill inserts to promote all assistance programs
- Letters are mailed to LIHEAP recipients not currently participating in PCAP
- News release to promote all assistance programs twice per year
- Monthly social media messages to promote an active program or assistance in general
- Radio commercials to promote LIHEAP or PCAP

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<sup>8</sup> *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Its Default Service Plan for the Period from June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, P-2021-3030021 (Order entered August 4, 2022).*

- Corporate website provides information for assistance programs along with an interactive tool to help determine income eligibility.
- On hold message to direct customers to our website for assistance information
- Provide education and promote enrollment to customers or agencies via Be Utility Wise, senior fairs, expos, etc.
- Distribute printed materials to community agencies
- Door hangers for field collections
- Referral information included on letters related to credit denial, security deposits, termination, etc.
- Referral information provided to customers during inbound contacts

The Companies make the following available to Spanish-speaking customers:

- PCAP agreement
- Program letters include Spanish verbiage
- PCAP brochures for distribution, live events, or online reference
- PA LIHEAP bill insert includes Spanish verbiage
- Dollar Energy Fund is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers.
- The Companies have interpreting services available for inbound inquiries

With the implementation of a revised PCAP program, the Companies will establish opportunities for community agencies to attend universal service training. A schedule of these events and venue (virtual, in-person or both) will be determined based on the known circumstances, such as weather, health and safety considerations.

### **PA Customer Assistance Program Organizational Structure**

A portion of the following employees' time supports this program.<sup>9</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services – Universal Service  
Business Analyst (78) – Various Levels  
Customer Accounting Associate (2) – Various Levels

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<sup>9</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## **WARM Program**

### **Program Overview and Objectives**

The WARM program is the name of the Companies' Low Income Usage Reduction Program (LIURP). The program provides energy education and energy conservation measures and services to low-income customers.

The program targets low-income customers who participate in PCAP or LIHEAP. The program's primary objectives are to:

1. Reduce the overall energy use, energy bills, and arrearages of low-income customers
2. Improve participants' health, safety, and comfort in their homes
3. Make personalized referrals to the Companies' USECP and other assistance programs

WARM achieves these objectives through two approaches. First, energy conservation improvements are installed, and inefficient appliances are replaced in the customer's home. Second, an energy conservation auditor provides energy education to family members and refers them to other potentially beneficial social service programs. All work performed through the WARM program is provided at no cost to program participants.

### **Eligibility Guidelines**

#### Income Eligibility:

Residential customers are eligible for WARM if their household income is at or below 150% of the FPIG.

The Companies also provide WARM services to customers with special needs whose household income is between 151% and 200% of FPIG. Commission regulations allow up to 20% of the WARM budget to be used for these customers. The definition has always included customers with overdue account balances, and the Companies also include those households with medical problems, personal crisis situations, and loss of income. This allows more customers under 200% of FPIG to participate in the program without requiring or encouraging an account arrearage.

#### Electric Use Eligibility and PCAP Participation Provision:

Customers who meet program income guidelines and have annual electric usage of 6,500 kWh or more annually will qualify. If customers participate in PCAP and have annual electric usage of 6,500 kWh or more, they are required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Such customers can refuse to have any of the recommended energy conservation measures installed.

PCAP customers that refuse to receive an in-home energy evaluation and work with a trained energy educator may be removed from PCAP. PCAP benefits will be retroactively applied should the PCAP customer later choose to participate within 12 months. Before a customer would be removed from PCAP, multiple attempts will be made to contact the customer using both phone calls and letters.

No minimum usage will be required for customers who are having their WARM services coordinated with the PA Weatherization Assistance Program (“WAP”) or with a Natural Gas Distribution Company (“NGDC”), such that most services are provided at the same time. In these cases, and when a fossil fuel heating system is present, the majority of full-service weatherization measures must be paid for by other program partners, and the costs of these measures must be documented in the program management system.

Some PCAP participants do not qualify for WARM because their electricity use does not meet the annual minimum. Other customers are limited in their ability to participate because their landlords will not agree to WARM services.

#### Residency Eligibility:

The customer must reside at the service address and have a minimum of 6 months of consecutive service. Both homeowners and renters qualify for the program; however, renters must obtain landlord approval for measures to be installed at the customer’s home that reduce seasonal kWh use, such as air sealing and insulation. If landlord approval is not received, only baseload measures will be installed (e.g., smart power strips, LED lightbulbs and refrigerator or freezer replacement if the appliance is owned by the customer).

The customer must agree to share his or her electric use information with the Companies’ agencies/contractors. In addition, the customer must allow contractors to have access to the home to perform appropriate program measures and quality assurance inspections.

Homes previously served by the program may receive WARM services again after 5 years if the home continues to have significant electric use or at the Companies’ discretion.

#### **Marketing**

To reach this customer segment, the application intake process for the PCAP and WARM programs has been streamlined to determine a customer’s eligibility for both programs at the same time. This process has proven to be a cost-effective holistic approach to helping low-income customers who could benefit from these programs.

All letters and applications are available in Spanish, and the WARM program uses a translation service for customers who speak a language other than English.

Geographic marketing tactics include a combination of mass communication vehicles and one-on-one communications, such as newspaper, cable TV, search engine marketing, bill inserts, and direct mail campaigns. Community presentations are also used to inform customers about the program.

A bill insert about customer assistance programs, including the WARM program, is sent annually to all residential customers. Program information and eligibility requirements are also shared with customers during fall and winter collection activities and distributed in customer winter surveys.

Cross-marketing with Act 129 programs is optimized. Customers may obtain program information by: 1) accessing the Companies’ *energysavepa.com* website; 2) reviewing program materials provided to them when they participate in the Act 129 appliance recycling program and/or appliance rebate program; and 3) receiving program advertisements included in customized Home Energy Reports.

The Companies plan to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, social media, and piloting

creative incentives to help identify and provide services to customers in need. The Companies also plan to update materials used in outreach efforts.

### Heating and Cooling Budget Calculation Per Home

The selection of measures designed to reduce electric heating and cooling is guided by a cost-effective budget calculation (seasonal allowance) for each home, based on past electric consumption with consideration also given to the regulatory seven- to twelve-year payback requirement. This calculation tool for contractors and agencies is not an absolute or prescriptive target for WARM. During the audit, if the site or customer needs are greater than the calculated budget, the contractor or agency will confer with the Company program manager after documenting reasons for proposing to go beyond the budget. The Company will decide to what extent additional work may be performed. This procedure allows higher budgets on higher-energy-use homes and prevents substantial use of funds on low-use homes where the potential for energy savings is less.

Increases in this seasonal allowance calculation are periodically implemented to keep pace with agency/contractor price increases.

The Commission previously granted the Companies a temporary partial waiver of the LIURP regulation at Section 58.11(a) that restricts each installed measure to a payback period of seven or twelve years. The waiver shall apply only to heating jobs for which the audit indicates the home should receive comprehensive measures. The overall job must still be cost-effective and otherwise meet LIURP regulations. The Companies request continuing applicability of this waiver to the Companies' USECP.

Baseload electric measures and appliance replacements are based upon on-site auditing and monitoring of energy use of the existing appliances. The replacement thresholds and procedures are updated periodically to reflect changes in costs and/or efficiencies.

### Energy Saving Measures

The specific measures installed, and actions taken are dependent on the customer's heat type, electric use, testing of appliances and diagnostic audit results. Customers and landlords have the right to refuse recommended measures. Contractors and agencies are required to install measures according to the program priority list found in the WARM Policy and Procedures Manual. Contractors are encouraged to consider cost effective custom measures and strive to meet relevant payback periods. Agencies and contractors provide one-year warranties on most measures and manufacturers may provide additional warranties. The following list identifies some of the measures that customers may receive through the WARM program:

- Blower door with pressure diagnostics to guide air sealing and duct sealing
- Attic, duct, basement, crawlspace, and perimeter air sealing (caulking, foam insulation & weather-stripping)
- Attic, wall, duct, floor, crawlspace, and perimeter insulation
- Sealing and insulating attic hatches
- Boxing and damming of attic heat producing fixtures
- Refrigerator replacement
- Freezer replacement
- Water heater replacement
- Heat pump water heaters
- Water heater pipe insulation
- Some aerator and showerhead replacement

- Some storm and prime window and door repair or replacement
- Reflective window tint to reduce cooling use
- Reflective roof coat to reduce cooling use
- Window/wall air conditioning unit replacement
- Some heating and air conditioning system replacement
- Electric dryer venting installation, repair, or replacement
- Clothesline installation
- Heated waterbed mattress replacement
- Some plumbing and electrical repairs
- Installing new exhaust fans
- Repair and replacement of exhaust fans
- Thermostat replacement/repair
- Air conditioning/heating system filter replacement
- Appliance and water heater timers
- Smart power strips
- Furnace whistle
- Energy education
- Remedial education as needed
- Smoke alarms
- CO detectors
- LED lighting
- Dehumidifier replacements
- Site specific health and safety measures, such as carbon monoxide detectors
- Custom measures, (i.e., well pump or holding tank replacements, etc.)

### **Energy Education**

The Companies and agencies/contractors use a proven partnership approach with the customer. The customer is asked to partner with the program agency/contractor to develop energy savings strategies designed specifically to address the highest energy use areas of the home and its occupants. Auditors help customers understand what is driving their electricity usage by putting costs on choices and behaviors. Then the auditor and customer sign partnership and savings strategy agreements.

Approximately 6 months after the completion of WARM services, the Company sends customers congratulatory letters when usage has decreased more than 5% when compared to the same months before WARM services. A list of customers whose usage has increased more than 10% is provided to agencies/contractors for a follow-up phone call and visit to the customer if necessary. The agency/contractor will check if measures are working properly and whether the customer understands how to use them or if lifestyle or structural changes created the increased electric use.

Another education resource for WARM program participants is the Act 129 program Home Energy Reports that include customized energy education messaging. These reports are sent to a subset of customers that have been identified as low-income customers, including WARM participants.

The Companies will continue to evaluate educational materials and tools for customers and auditors and make updates as needed.

## Companies' Organizational Structure

A portion of the following employees' time supports the program.<sup>10</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services – Energy Conservation  
Business Analyst (9) – Various Levels  
Customer Accounting Associate (1)

## Program Delivery

The Companies contract with a network of CBOs and energy conservation contractors, referenced in Attachment A of this plan, to deliver program services. CBOs and energy conservation contractors may be eligible for incentives if they meet performance goals.

Program auditors or crew members, who make decisions about what measures will be installed in the home and who perform the combustion safety testing procedures, must be Building Performance Institute (BPI) certified as Building Analyst Professionals. BPI is a national standards development and credentialing organization for residential energy efficiency retrofit work. It is a non-profit organization that also provides training through a network of training affiliate organizations. The Companies sponsor agency and contractor attendance at national and regional ACI Home Performance Conferences to allow agencies/contractors to obtain continuing education credits needed to retain their BPI certification.

The Companies also hold WARM program training specific to USECP procedural issues or to meet the training needs of auditors and crew members. The Companies recognize that CBOs and energy conservation contractors have seen an increase in staff turnover since the pandemic began. During the plan years, the Companies will continue to focus on training, utilizing webinars, in-person group sessions when practical, and one-on-one training when needed. Topics of emphasis will include:

- Auditing training for new auditors utilizing newly developed and timely materials
- Overcoming barriers to the installation of energy conservation measures
- Policy and procedure updates

The Companies and its contractors benefitted greatly from the roll out of the Low- Income Energy Conservation and Energy Efficiency Network or LEEN program management and tracking system in 2019. The LEEN system:

- Facilitates workload management through the use of work queues
- Promotes effective communication and documentation through an enhanced user

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<sup>10</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

messaging system

- Provides dashboards to give graphical representations of progress towards goals
- Has robust reporting capabilities
- Features the automatic retrieval of customer information system data at the time of job creation, etc.

Future enhancements proposed for LEEN include:

- Invoice payment and SAP cost accounting system integration
- Incorporating the WARM energy audit into LEEN

### **Quality Assurance Provisions**

The Companies plan to maintain the same level of third-party quality assurance inspections, inspecting 35% of total production. The quality assurance contractors will continue to focus the majority of their inspections on homes that have electric heat as well as supplemental electric heating or air conditioning. Greater oversight is needed in these homes because of the installation of comprehensive measures and combustion safety testing. The quality assurance contractor also delivers, or coordinates auditor, crew, and group training as needed and provides mentoring to new energy auditors.

The Companies continue to use a WARM Advisory Panel that meets 2 to 3 times per year and is on-call year-round. The panel members consist of agency and contractor auditors, and program managers from across Pennsylvania along with principal WARM quality assurance inspectors. The members have direct contact with customers and other assistance programs in other states. They provide suggestions for program improvement, research new technologies, and test new measures and products.

Company program managers meet with all agencies and contractors annually to share program changes and solicit feedback. Company program managers work closely with individual agencies and contractors, often observing audits and crew work in the field.

The Companies also strive to defer to the Department of Energy National Standard Work Specifications-based quality control inspection protocols on jobs coordinated with WAP where possible and practical.

### **Coordination of Services**

As recommended by the Commission, the Companies will continue to direct agencies and contractors to coordinate delivery of WARM benefits with other programs. The Companies work with WAP and NGDCs to coordinate delivery. Although coordination may allow for the efficient use of funding sources and resources, coordination may impact the program's overall electric energy savings. This is due to the fact that the customers identified by NGDCs or WAP might not be the highest electric users targeted for participation in the WARM program. When a surplus of low-income customers exists, the Companies continue to prioritize customers by highest energy use first. Most WARM jobs are coordinated with an Act 129 program.

The Companies continue to find that many WARM participants are using supplemental electric heat in the winter even though the primary source of heat in the home is something other than electricity. Since this is a frequent occurrence, the Companies strive to reduce the customer's supplemental electric heat use by coordinating services with the WAP and NGDC LIURP programs to repair gas or oil heating systems where possible.

To increase the accuracy of reporting coordinated jobs with other programs, functionality was added to the LEEN system that requires contractors to document coordinated job information.

The Companies will continue to provide energy usage data to the Department of Community and Economic Development to assist in its WAP energy saving studies.

## Health and Safety

Health and safety measures are installed to allow WARM contractors to proceed with the installation of energy-saving measures at a customer's home. The purpose of health and safety measures is to ensure that WARM's energy-saving measures may be installed and operate safely. Examples of such measures include:

- Roof repairs
- Knob and tube wiring remediation
- Damming of heat producing light fixtures; and
- Flue repairs

Certain health and safety measures may help protect a home's occupants, but typically do not lead to reduced electricity usage. Such measures include, but are not limited to:

- Smoke alarms and carbon monoxide detectors; and
- Pressure relief valves and overflow pipes on water heaters.

Where customers have a fossil fuel heating system, the Companies perform combustion safety testing to ensure safe use of combustion appliances/systems whenever measures are installed that impact the building envelop (e.g., air sealing). WARM contractors adhere to the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 62.2 ventilation standards.

The Companies allow up to 50% of the seasonal allowance to be spent on health and safety measures. This is in addition to the seasonal allowance funds to install energy reduction measures. Contractors are encouraged to reach out to their Company program manager when additional health and safety funds are needed to fully address barriers to the installation of energy reduction measures.

## Reporting

The following reports are submitted to the Commission or Department of Human Services on an annual basis:

- |   |          |
|---|----------|
| - LIURP production, expenditures, cost of jobs and goals report | March 1  |
| - Universal Service Program (LIURP Section)                     | April 1  |
| - Conservation economics and energy planning bureau report      | April 30 |
| - LIURP annual energy savings impact evaluation                 | April 30 |

## LIURP Needs Assessments

The Companies currently project there are approximately 76,411~~35,405~~ potential LIURP participants in the Met-Ed service territory with incomes at or below 150% of Federal Poverty Income Guidelines (FPIG)~~.~~. The comparable totals for Penelec, Penn Power and West Penn are 72,573, 16,416~~36,205~~, 7,068 and 1616,497~~66,895~~, respectively. Details of the Companies needs assessments are shown below, including estimates of potential LIURP participants with incomes 151-200% of FPIG.

FirstEnergy LIURP Needs Assessments				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Total Residential Customers (December 2021)</b>	513,743	501,640	143,672	632,933
<b>Number of Customers with Incomes at or Below 150% of FPIG</b>	109,200	146,334	34,284	150,565
Usage at or Above 6,500 kWh per Year	88,452	88,532	21,942	126,023
Received WARM in the Last Five Years	5,545	8,800	3,264	4,716
Less than Six Months of Usage History	1,520	1,467	327	1,238
Renters Projected where LL Refused	1,265	916	313	650
Projected to Drop Out	3,362	4,365	1,588	1,251
Number of Customers Receiving Services - Act 129	349	411	34	1,671
<b>Total Potential Participants</b>	<b>76,411</b>	<b>72,573</b>	<b>16,416</b>	<b>116,497</b>
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 389,741,946.60	\$ 214,525,788.00	\$ 66,109,366.08	\$ 722,509,734.12
Estimated Renters	74,243	43,577	9,467	57,316
<b>Number of Customers with Incomes 151-200% of FPIG</b>	<b>48,355</b>	<b>57,086</b>	<b>14,856</b>	<b>60,818</b>
Usage at or Above 6,500 kWh per Year	39,168	34,537	9,508	50,905
Received WARM in the Last Five Years	1,259	1,099	437	711
Less than Six Months of Usage History	673	572	142	500
Renters Projected where LL Refused	942	714	127	222
Projected to Drop Out	763	545	212	189
<b>Total Potential Participants</b>	<b>35,531</b>	<b>31,607</b>	<b>8,590</b>	<b>49,283</b>
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 181,230,057.80	\$ 93,431,000.45	\$ 34,593,008.16	\$ 305,651,194.68
Estimated Renters	25,421	13,560	3,844	19,579

### Met-Ed LIURP Needs Assessment

<b>Total Residential Customers (December 2021)</b>	513,743
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	109,200
Percent of Residential Customers Below 150% of FPIG	21.30%
Estimated Number of Potential Program Participants	35,405

**Penelec LIURP Needs Assessment**

<b>Total Residential Customers (December 2021)</b>	501,640
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	146,334
Percent of Residential Customers Below 150% of FPIG	29.20%
Estimated Number of Potential Program Participants	36,205

**Penn Power LIURP Needs Assessment**

<b>Total Residential Customers (December 2021)</b>	143,672
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	34,284
Percent of Residential Customers Below 150% of FPIG	23.10%
Estimated Number of Potential Program Participants	7,068

**West Penn LIURP Needs Assessment**

<b>Total Residential Customers (December 2021)</b>	632,933
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	150,565
Percent of Residential Customers Below 150% of FPIG	23.80%
Estimated Number of Potential Program Participants	66,895

~~The Companies considered the following when developing the estimates of potential participants:~~

- ~~• The number of customers or homes already served.~~
- ~~• The projected annual kWh use of income qualified customers. Some customers are unwilling or unable to participate in WARM. Some customers will receive energy conservation services through Act 129 programs.~~

**Funding and Enrollment Goals<sup>11</sup>**

<sup>11</sup> The WARM budgets are based on projected WARM enrollment levels for the 2024 through 2028 program years. However, where a budget is overestimated in the USECP for one program year, the Companies will roll

**Met-Ed**

Year	Budget	Participant Goals
2024	\$6,916,000	1,000
2025	\$7,250,660	1,000
2026	\$7,601,473	1,000
2027	\$7,753,503	1,000
2028	\$7,908,573	1,000

**Penelec**

Year	Budget	Participant Goals
2024	\$7,490,000	1,735
2025	\$7,639,860	1,735
2026	\$7,792,897	1,735
2027	\$7,948,755	1,735
2028	\$8,107,730	1,735

**Penn Power**

Year	Budget	Participant Goals
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

**West Penn Power**

Year	Budget	Participant Goals
2024	\$7,327,000	970
2025	\$7,473,560	970
2026	\$7,624,251	970
2027	\$7,776,736	970
2028	\$7,932,271	970

**Met-Ed**

Year	Budget	Participant Goals
2024	\$6,916,000	1,000
2025	\$7,315,640	1,000
2026	\$7,738,952	1,000
2027	\$8,187,350	1,000
2028	\$8,662,333	1,000

over this excess budget amount from one program year to the next consistent with the Companies' last base rate settlement. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016- 2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R- 2016-2537359 (Opinion and Order entered Jan. 19, 2017).

Penelec		
Year	Budget	Participant Goals
2024	\$7,890,000	1,735
2025	\$8,345,680	1,735
2026	\$8,828,346	1,735
2027	\$9,339,611	1,735
2028	\$9,881,183	1,735

Penn Power		
Year	Budget	Participant Goals
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

West Penn Power		
Year	Budget	Participant Goals
2024	\$8,578,000	1,000
2025	\$9,079,560	1,000
2026	\$9,610,951	1,000
2027	\$10,173,958	1,000
2028	\$10,770,473	1,000

In general, the average cost of serving WARM participants' homes has increased over the years due to measure price increases, particularly since the beginning of the COVID-19 pandemic. Also, seasonal load reduction measures continue to be installed in homes using electric space heaters in lieu of fossil fuel heaters. Homes that previously were classified as water heat or baseload jobs that received lighting, refrigerator replacements and water heat reduction measures require attic air sealing, insulation, and combustion safety tests in many cases. Due to the increased complexity of the measures, it also takes more days to serve these homes, which prevents agencies and contractors from serving the same number of homes as under prior plans. The Companies continue to stress with contractors that they need to overcome barriers to the installation of measures wherever possible.

Participant goals are also consistent with the Companies' experience in a post-COVID-19 world where contractors continue to struggle to maintain adequate staffing levels. Also, the Companies are finding it difficult to find enough customers willing to participate in WARM in certain areas of their service territory, particularly Penn Power. Holding participant goals at the levels proposed will allow spending per home to gradually increase over the term of the plan. The Companies propose that any unspent funds from the current plan period be carried over into the new plan period as reserve funds.



## Summary of Proposed Program Additions and Modifications

### PCAP

All changes approved by the Commission for the 2024-2028 plan will be effective after the relevant information technology changes are made. The previously approved plan will remain effective until such IT changes are adopted. The following program modifications are included in this plan for PCAP as compared to the Companies' current USECP approved on July 11, 2019:

1. PCAP will be converted from a fixed credit program to a percentage-of-income payment program, which does not involve the equal payment plan or a minimum energy burden. The participant will be billed a percentage-of-income payment or the actual charges, whichever is less. Percentage-of-income payments are based on federal poverty level, heat type, and income as defined in the 2019 Amended CAP Policy Statement.
2. The Companies will continue utilizing the Commission-approved zero-income form modified for completion telephonically.
3. The Companies are introducing a customer education and outreach plan.
4. The Companies affirmatively acknowledge that they accept income documentation of 30 days or 12 months, whichever is more beneficial.
5. The Companies propose income documentation will not be required during application or recertification when the customer is known to be a LIHEAP recipient within the last 12 months from the date of the application. Income information will be obtained verbally to complete the application.
6. Subsidy maximums will be eliminated to ensure customers' bills maintain affordability and align with the percentage of income guidelines established in the 2019 Amended CAP Policy Statement based on federal poverty levels and heat type.
7. Recertification periods will be modified to align with the CAP Policy Statement based on income source and/or receipt of LIHEAP.
8. Suspension period will be eliminated as part of the recertification process.
9. Debt forgiveness period will be changed from 36 months to 12 months.
10. Remove dismissal due to a minimum energy burden requirement (aka graduated)
11. The requirement to participate in the equal payment plan has been eliminated.
12. Retroactive credits will be provided to participants removed from PCAP due to failure to participate in the WARM.

### WARM

The following program modifications are included in this plan for WARM:

1. If customers participate in PCAP, they will be required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Failure to do so may result in the customer being removed from PCAP. Customers who are removed from PCAP that later decide to participate in WARM within 12 months will have the PCAP subsidy and/or forgiveness credits applied retroactively.
2. The Companies plan to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, and social media to help identify and provide services to customers in need. The Companies also plan to update materials used in outreach efforts.

## **Applied Technologies in Support of Universal Service Programs**

The Companies employ various technologies to promote an efficient delivery of their USECP. Some of the more significant technologies are described below:

### **C-Net On-line Help System**

C-Net On-Line Help System is a Microsoft Office application called SharePoint. C-Net provides the Companies' Customer Contact Centers and the Human Services department employees with detailed on-line information on federal and state programs and the Companies' USECP.

### **SAP**

SAP is the Companies' host computer system containing the customer master file.

### **Human Services Web Site**

The Human Services web site allows CBOs to easily obtain current customer billing, payment, energy use and other information while evaluating customers' energy assistance applications without Customer Contact Center or Human Services involvement. Entry to the site is password protected.

### **LEEN System**

The LEEN system is a web-based system used to assist inspectors, contractors, and the Companies' administrators in their management of the WARM program. This system replaced the WARM system. Some features include:

- Streamlined security role structure
- SAP integration for application entry and job status
- Enhanced job assignment process
- Enhanced job status reports for quality assurance staff and program managers
- Invoice management process
- Work queues functionality
- Required fields to support the documentation and reporting of coordinated jobs

### **Application Intake System**

The Companies are currently developing a new web-based application system for PCAP and WARM applications. The intent of the system is to provide an administrator the ability to take applications by phone or mail, as well as provide customers a tool for self-service. The application will provide document storage, historical records, and limited SAP integration. The system will provide automated updates to customers as the application moves through the workflow process. The Company plans to eliminate requesting social security numbers as part of the application process. Customers will be asked to provide their account number instead. The system is anticipated to be online in 2023.

## Universal Service Eligibility Criteria

### PCAP

- Total gross household income is at or below 150% of FPIG. Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial to determine program eligibility.
  - The Companies require households reporting zero income to complete a zero-income form. The form is a Commission-approved form that has been modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
- Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits:
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

### WARM

- Total gross household income is at or below 150% FPIG; up to twenty percent of the budget is used for customers with special needs at 151%-200% FPIG.
- The customer must reside at service address and have six months of consecutive electric service.
- The customer must provide proof of home ownership.
- A minimum annual use of 6,500 kWh is required; 0 kWh for homes coordinated with state or gas weatherization.
- Home may receive services again after five years.

### Hardship Fund

- Total gross household income must be at or below 250% FPIG.
- The account is for a residential single home or apartment.
- The name on the account must be an adult resident; a residency exception will be made for ratepayers assigned to active military duty.
- The customer must have paid a minimum of \$150 on their account within the past ninety days (minimum of \$100 if age 62 or over) and the account balance must be at least \$100. Customers age 62 and over may have a \$0 balance, but not a credit balance.

## **CARES**

To qualify, the customer must be payment-troubled and experiencing a recent hardship, such as serious illness or injury to a member of a household, death of a wage earner, marital or family problems, handicapped or disabled person, sudden loss of income to the household, or any customer 60 years of age or over requiring special assistance.

## Universal Service Needs Assessments

### 2021 Needs Assessment - Met-Ed

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

County	Total Households	Households Under 150% Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	39,628	7,323	18.48%	30,629	5,660	
Berks	156,389	38,721	24.76%	130,035	32,197	
Bucks	240,763	29,964	12.45%	5,190	646	
Chester	192,951	27,370	14.18%	1,150	163	
Cumberland	101,176	16,896	16.70%	10,739	1,793	
Dauphin	113,759	27,277	23.98%	5,886	1,411	
Lancaster	204,003	43,224	21.19%	1,986	421	
Lebanon	53,857	12,354	22.94%	53,549	12,284	
Lehigh	140,072	36,308	25.92%	3,749	972	
Monroe	59,950	13,915	23.21%	21,646	5,024	
Montgomery	318,648	41,675	13.08%	11,690	1,529	
Northampton	115,300	22,376	19.41%	60,283	11,701	
Pike	22,717	4,365	19.21%	15,674	3,011	
York	174,425	34,979	20.05%	161,537	32,388	
<b>Total</b>	<b>1,933,638</b>	<b>356,747</b>	<b>18.45%</b>	<b>513,743</b>	<b>109,200</b>	<b>21.256%</b>

2021 Needs Assessment - Penelec

Based on:  
 Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
 December 2021 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Armstrong	28,035	7,272	25.94%	99	26	
Bedford	19,930	5,597	28.08%	10,159	2,853	
Blair	51,647	14,755	28.57%	48,867	13,961	
Bradford	25,084	7,186	28.65%	19,753	5,659	
Cambria	56,933	16,547	29.06%	55,048	15,997	
Centre	59,380	18,070	30.43%	4,483	1,364	
Clarion	15,930	5,347	33.57%	4,967	1,667	
Clearfield	31,704	9,616	30.33%	29,890	9,066	
Crawford	35,169	10,586	30.10%	22,361	6,731	
Cumberland	101,176	16,896	16.70%	5,311	887	
Erie	110,388	34,239	31.02%	107,396	33,314	
Forest	2,131	632	29.66%	3,459	1,026	
Franklin	61,617	14,456	23.46%	5,129	1,203	
Huntington	16,779	4,116	24.53%	11,585	2,842	
Indiana	33,855	11,358	33.55%	22,734	7,627	
Jefferson	18,400	5,510	29.95%	14,203	4,254	
Juniata	9,380	2,474	26.38%	726	192	
Lycoming	46,160	12,403	26.87%	727	195	
McKean	17,059	5,598	32.82%	14,128	4,637	
Mifflin	19,075	5,808	30.45%	19,517	5,943	
Perry	18,512	3,850	20.80%	990	206	
Potter	6,630	2,083	31.42%	2,521	792	
Somerset	29,518	7,511	25.45%	26,610	6,772	
Sullivan	2,751	674	24.50%	2,899	710	
Susquehanna	17,027	4,386	25.76%	11,811	3,043	
Tioga	16,442	4,803	29.21%	10,597	3,095	
Venango	22,103	6,399	28.95%	18,657	5,401	
Warren	17,124	4,744	27.70%	14,886	4,123	
Wayne	18,938	4,862	25.67%	3,080	791	
Westmoreland	153,772	31,940	20.77%	1,992	414	
Wyoming	10,887	2,381	21.87%	7,055	1,543	
<b>Total</b>	<b>1,073,536</b>	<b>282,099</b>	<b>26.28%</b>	<b>501,640</b>	<b>146,334</b>	<b>29.171%</b>

**2021 Needs Assessment - Penn Power**

Based on:  
 Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
 December 2021 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Allegheny	545,695	122,398	22.43%	20,482	4,594	
Beaver	72,086	16,123	22.37%	11,627	2,601	
Butler	77,725	13,883	17.86%	30,766	5,495	
Crawford	35,169	10,586	30.10%	6,358	1,914	
Lawrence	37,300	10,558	28.31%	33,652	9,527	
Mercer	46,821	13,013	27.79%	45,767	12,719	
Venango	22,103	6,399	28.95%	20	6	
<b>Total</b>	<b>836,899</b>	<b>192,960</b>	<b>23.06%</b>	<b>148,672</b>	<b>34,284</b>	<b>23.060%</b>

2021 Needs Assessment - West Penn Power

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	39,628	7,323	18.48%	1,597	295	
Allegheny	545,695	122,398	22.43%	71,498	16,037	
Armstrong	28,035	7,272	25.94%	29,662	7,694	
Bedford	19,930	5,597	28.08%	4,130	1,160	
Blair	51,647	14,755	28.57%	19	5	
Butler	77,725	13,883	17.86%	44,613	7,968	
Cameron	2,334	797	34.15%	3,476	1,187	
Centre	59,380	18,070	30.43%	55,092	16,764	
Clarion	15,930	5,347	33.57%	8,917	2,993	
Clinton	15,058	4,705	31.25%	2,598	812	
Elk	14,215	3,365	23.67%	16,180	3,830	
Fayette	55,346	17,679	31.94%	61,174	19,539	
Franklin	61,617	14,456	23.46%	48,825	11,454	
Fulton	6,040	1,429	23.66%	5,232	1,238	
Greene	14,503	3,898	26.88%	16,113	4,331	
Huntingdon	16,779	4,116	24.53%	53	13	
Indiana	33,855	11,358	33.55%	1,339	449	
Jefferson	18,400	5,510	29.95%	43	13	
Lycoming	46,160	12,403	26.87%	494	133	
McKean	17,059	5,598	32.82%	4,406	1,446	
Potter	6,630	2,083	31.42%	2,556	803	
Somerset	29,518	7,511	25.45%	243	62	
Washington	85,201	17,193	20.18%	94,379	19,046	
Westmoreland	153,772	31,940	20.77%	160,294	33,293	
<b>Total</b>	<b>1,414,457</b>	<b>338,686</b>	<b>23.94%</b>	<b>632,933</b>	<b>150,565</b>	<b>23.788%</b>

### Universal Service Participant and Budget Projections

<b>Met Ed Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	13,258	13,286	13,314	13,342	13,370
Administration	1,000,554	1,002,667	1,004,780	1,006,893	1,009,006
Bill Subsidy	16,414,812	16,449,479	16,484,146	16,518,813	16,553,480
Debt Forgiveness	10,832,941	6,330,784	4,845,072	4,354,788	4,192,994
Total PCAP	28,248,307	23,782,930	22,333,998	21,880,494	21,755,480
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,000	1,000	1,000	1,000	1,000
Total WARM	6,916,000	7,315,640	7,738,952	8,187,350	8,662,333
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	5,500	5,500	5,500	5,500	5,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Met-Ed</b>	<b>35,246,807</b>	<b>31,181,070</b>	<b>30,155,450</b>	<b>30,150,344</b>	<b>30,500,313</b>

<b>Penelec Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	18,159	18,494	18,835	19,183	19,537
Administration	1,245,942	1,268,928	1,292,325	1,316,202	1,340,491
Bill Subsidy	18,932,306	19,281,572	19,637,094	19,999,913	20,368,988
Debt Forgiveness	11,780,356	6,728,943	5,061,976	4,511,877	4,330,345
Total PCAP	31,958,604	27,279,443	25,991,394	25,827,992	26,039,824
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,735	1,735	1,735	1,735	1,735
Total WARM	7,890,000	8,345,680	8,828,346	9,339,611	9,881,183
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Penelec</b>	<b>32,040,839</b>	<b>27,361,678</b>	<b>26,073,629</b>	<b>25,910,227</b>	<b>26,122,059</b>

<b>Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	4,254	4,479	4,716	4,965	5,227
Administration	307,137	323,382	340,493	358,471	377,387
Bill Subsidy	4,834,351	5,090,047	5,359,380	5,642,350	5,940,093
Debt Forgiveness	2,678,624	1,463,774	1,062,873	930,576	886,918
Total PCAP	7,820,112	6,877,203	6,762,746	6,931,396	7,204,398
<b>WARM (LIURP)</b>					
Projected WARM Participants	600	600	600	600	600
Total WARM	3,466,000	3,535,760	3,606,635	3,678,768	3,752,343
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
<b>Gatekeeper</b>					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
<b>Total Penn Power</b>	<b>11,323,112</b>	<b>10,449,963</b>	<b>10,406,381</b>	<b>10,647,164</b>	<b>10,993,741</b>

<b>West Penn Power Projected Budgets</b>					
<b>PCAP</b>					
Projected PCAP Participants	15,666	16,369	17,104	17,872	18,674
Administration	1,043,427	1,090,250	1,139,204	1,190,357	1,243,774
Bill Subsidy	16,150,199	16,874,927	17,632,644	18,424,382	19,251,169
Debt Forgiveness	11,781,446	7,121,640	5,583,904	5,076,451	4,908,991
Total PCAP	28,975,072	25,086,817	24,355,753	24,691,189	25,403,934
<b>WARM (LIURP)</b>					
Projected WARM Participants	1000	1000	1000	1000	1000
Total WARM	8,578,000	9,079,560	9,610,951	10,173,958	10,770,473
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total West Penn Power</b>	<b>37,605,072</b>	<b>34,218,377</b>	<b>34,018,704</b>	<b>34,917,147</b>	<b>36,226,407</b>

<b>Met Ed Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	20,520	22,052	23,698	24,053	24,413
Administration	1,544,682	1,660,006	1,783,911	1,810,635	1,837,734
Bill Subsidy	24,302,103	26,116,156	28,066,352	28,487,155	28,912,969
Debt Forgiveness	9,138,423	5,771,593	4,660,539	4,293,892	4,172,898
Total PCAP	34,985,207	33,547,755	34,510,803	34,591,681	34,923,601
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,000	1,000	1,000	1,000	1,000
Total WARM	6,916,000	7,250,660	7,601,473	7,753,503	7,908,573
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	5500	5,500	5,500	5,500	5,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Met-Ed</b>	<b>41,983,707</b>	<b>40,880,915</b>	<b>42,194,776</b>	<b>42,427,684</b>	<b>42,914,674</b>

<b>Penelec Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	25,170	26,277	27,432	27,843	28,260
Administration	1,692,430	1,766,864	1,844,527	1,872,162	1,900,201
Bill Subsidy	24,168,036	25,231,288	26,340,102	26,734,561	27,135,241
Debt Forgiveness	9,350,602	5,927,124	4,797,376	4,424,559	4,301,530
Total PCAP	35,211,068	32,925,276	32,982,005	33,031,283	33,336,972
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,735	1,735	1,735	1,735	1,735
Total WARM	7,490,000	7,639,860	7,792,897	7,948,775	8,107,730
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Penelec</b>	<b>35,293,303</b>	<b>33,007,511</b>	<b>33,064,240</b>	<b>33,113,518</b>	<b>33,419,207</b>

<b>Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	6,319	6,622	6,939	7,043	7,148
Administration	498,194	522,083	547,075	555,275	563,553
Bill Subsidy	6,702,521	7,023,720	7,361,013	7,471,392	7,582,117
Debt Forgiveness	2,242,645	1,319,900	1,015,395	914,908	881,747
Total PCAP	9,443,360	8,865,703	8,923,483	8,941,575	9,027,417
<b>WARM (LIURP)</b>					
Projected WARM Participants	600	600	600	600	600
Total WARM	3,466,000	3,535,760	3,606,635	3,678,768	3,752,343
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
<b>Gatekeeper</b>					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
<b>Total Penn Power</b>	<b>12,946,360</b>	<b>12,438,463</b>	<b>12,567,118</b>	<b>12,657,343</b>	<b>12,816,760</b>

<b>West Penn Power Projected Budgets</b>					
<b>PCAP</b>					
Projected PCAP Participants	21,521	21,736	21,954	22,173	22,395
Administration	2,968,104	2,997,756	3,027,822	3,058,025	3,088,643
Bill Subsidy	19,826,250	20,034,344	20,235,892	20,436,834	20,641,892
Debt Forgiveness	10,301,429	6,633,234	5,422,730	5,023,263	4,891,439
Total PCAP	33,095,783	29,665,334	28,686,443	28,518,123	28,621,974
<b>WARM (LIURP)</b>					
Projected WARM Participants	970	970	970	970	970
Total WARM	7,327,000	7,473,560	7,624,251	7,776,736	7,932,271
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total West Penn Power</b>	<b>40,474,783</b>	<b>37,190,894</b>	<b>36,362,694</b>	<b>36,346,859</b>	<b>36,606,245</b>

The PCAP budgets are based on projected PCAP enrollment levels for 2024 through 2028 program years and the estimated average expense per year-end participant. The Companies attempt to consider plan changes and past trends during similar events when estimating expenses or participation. The budgets may be adjusted each year based on actual data to minimize over and under-collections from customers.

## Conclusion

The Companies submit their Universal Service and Energy Conservation Program is consistent with all applicable Commission requirements, including the following:

- 52 Pa. Code § 56.1, *et seq.* (Standards and Billing Practices for Residential Utility Service)
- 66 Pa. C.S. § 1401, *et seq.* (Responsible Utility Customer Protection Act)
- 52 Pa. Code §§ 54.71-54.78 (Reporting Requirements for Universal Service and Energy Conservation Programs)
- 52 Pa. Code §§ 58.1-58.18 (regarding LIURP)
- PCAP Policy Statement of July 25, 1992, Docket No. M-00920345
- 66 Pa. C.S. §§ 2801, *et seq.* (Electricity Generation Customer Choice and Competition Act)
- Commission Universal Service and Energy Conservation Programs Guidelines, Docket No. M-00960890F0010 (Order entered Jul. 10, 1997)
- Commission Universal Service and Energy Conservation Program Reporting Requirements, Docket No. L-00970130 (Order entered Apr. 30, 1998)
- Customer Assistance Programs: Funding Levels and Cost Recovery Mechanisms, Docket No. M-00051923 (Order entered Dec. 18, 2006)
- Cost recovery of USECP costs via the Companies' Universal Service Cost Riders as approved by the Commission's Orders at Docket Nos. R-00061366, R-00061367, R-00072437, and R-2014-2428742
- *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017)

## Company Contacts

Inquiries regarding this report should be directed to:

Lori Brightbill, Supervisor – Energy Conservation Programs  
Human Services Department  
P. O. Box 16001  
Reading, Pennsylvania 19612-6001  
Telephone: 610-921-6983  
Email: llbrightbill@firstenergycorp.com

Leonard Howell, Supervisor – Universal Service Programs  
Human Services Department  
5001 Nasa Blvd  
Fairmont, West Virginia 26554  
Telephone: 681-753-5518  
Email: lhowell@firstenergycorp.com

Walt Larned, Manager Revenue Operations Strategy  
5001 Nasa Blvd  
Fairmont, West Virginia 26554  
Telephone: 681-753-5583  
Email: wlarner@firstenergycorp.com

## Attachment A

### Community-Based Organizations (CBO)

- ACTION-Housing Inc. 1-800-841-6899
- Bill Busters Inc. 1-800-475-1251
- Blair County Community Action 1-800-238-9763
- CMC Energy Services 1-877-785-9276
- CLEARresult 1-800-367-7223
- Community Action Committee of the Lehigh Valley 1-866-847-4565
- Community Action Partnership of Mercer County 1-888-508-5216
- Center for Community Action 1-800-323-9997
- Central PA Community Action, Inc. 1-814-765-1551
- C. Driscoll Positive Energy Consulting 1-724-984-4147
- Dollar Energy Fund 1-888-282-6816
- Erie County Housing Authority 1-800-841-6899
- Harron's Home Center 1-877-274-6276
- Healthy Homes 1-724-662-3591
- Hranec Insulation Corporation 1-724-363-0092
- Mincin Insulation 1-412-461-0160
- MT Weatherization 717-525-9665
- Northern Tier Community Action Corporation 1-814-486-1161
- Northwest PA Weatherization 1-814-425-1872
- SEDA-Council of Governments 1-570-524-4491
- Solaire Energy, Inc. 1-800-518-8911
- South Central Community Action Programs 1-800-451-8969
- Tableland Services, Inc. 1-814-445-9628
- TEAZ, Inc. 1-724-366-6753
- True Management, LLC 1-484-866-8011
- Warren Forest Counties Economic Opportunity Council 1-800-231-1797
- Weatherization, Inc. 1-877-984-7462
- York Home Performance 717-586-8584



**Joint Universal Service &  
Energy Conservation Plan**

**Program Years 2024-2028**

**Metropolitan Edison Company  
Pennsylvania Electric Company  
Pennsylvania Power Company  
West Penn Power Company**



**November 1, 2022**

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## Introduction

Metropolitan Edison Company's ("Met-Ed") Pennsylvania Electric Company's ("Penelec"), Pennsylvania Power Company's ("Penn Power"), and West Penn Power Company's ("West Penn") (individually referred to as "Company" or collectively referred to as the "Companies") Joint 2024 - 2028 Universal Service and Energy Conservation Plan ("USECP") is provided to the Pennsylvania Public Utility Commission ("Commission") in accordance with Universal Service and Energy Conservation Reporting Requirements at 52 Pa. Code §§ 54.71-54.78 and the 2019 Amendments to the Policy Statement on Customer Assistance Programs ("CAP Policy Statement"), 52 Pa. Code §§ 69.261–69.267.

The Companies are committed to providing customer-focused, quality-driven, results-oriented Universal Service and Energy Conservation Programs<sup>1</sup> in a cost-effective and holistic manner.

The goals of the Companies' Universal Service and Energy Conservation Programs are to:

- Protect consumers' health and safety by helping low-income customers maintain affordable utility service
- Provide for affordable utility service by making available payment assistance to low-income customers
- Help low-income customers conserve energy and reduce residential utility bills
- Ensure Universal Service and Energy Conservation Programs are operated in a cost-effective and efficient manner

The Companies will continue to work with eligible customers in establishing affordable payment agreements that maintain electric service and move them toward self-sufficiency in paying their electric bill.

Beginning in 2017, the Companies established a Universal Service Advisory Committee ("USAC") comprising representatives from the Companies, the Pennsylvania Office of Consumer Advocate ("OCA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Commission's Bureau of Investigation and Enforcement ("BI&E"), the Commission's Bureau of Consumer Service ("BCS") and the organizations that administer the Companies' USECP, which holds meetings at least twice a year with respect to the Companies' USECP programs.<sup>2</sup> The USAC's purpose is to explore opportunities for enhancements to the Companies' USECP programs, as well as opportunities for outreach and education, language access, notification to low-income customers regarding topics of interest, including security deposit waivers and bill clarity. At the Companies' sole

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<sup>1</sup> As defined in Section 2803 of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2803, "universal service and energy conservation" refers to those "policies, protections and services that help low-income customers to maintain electric service. The term includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education."

<sup>2</sup> The USAC was a product of the Companies' 2016 base rate cases. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa. Pub. Util. Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017).

discretion, process or program changes raised through the USAC may be filed for approval at the Commission as proposed revisions to the Companies' USECP on a case-by-case basis.

Additionally, the Companies meet with a WARM advisory panel to further explore opportunities to achieve the energy conservation program goals. The members of the panel are as follows:

WARM Advisory Panel Members - Statewide

ACTION-Housing	Pittsburgh
CLEARresult	Lancaster
Honeywell	Raleigh, NC
MT Weatherization	Hummelstown
Northwest PA Weatherization	Meadville
Performance Systems Development	Ithaca, NY
Solaire Energy, Inc.	Canton
South Central Community Action Programs	Gettysburg

Consumer Group Representation

Pennsylvania Utility Law Project  
Community Legal Services of Philadelphia  
Office of Consumer Advocate

Regulatory Representation

Bureau of Consumer Services

All costs associated with each Company's USECP are funded through the Company's Universal Service Cost Rider.

This plan describes the Companies' portfolio of USECP programs for program years 2024-2028. To align the Companies' low-income program, Pennsylvania Customer Assistance Program ("PCAP"), with the 2019 Amended CAP Policy Statement, PCAP will no longer be a fixed credit program. The core changes are as follows:

- Fixed monthly credits and associated recalculations will be eliminated.
- The monthly bill will be based on a percentage of income-payment ("PIP") established by heat type and federal poverty level, with a minimum bill component. Accounts will not be on the equal payment plan ("EPP") or experience 'true-ups.'
- Subsidy maximums will be eliminated to help ensure customers' bills maintain affordability and align with the percentage of income guidelines based on federal poverty levels and heat type as they are defined in the CAP Policy Statement.
- Recertification periods will be lengthened as defined in the CAP Policy Statement.
- Participants will no longer be graduated or denied enrollment due to low energy burdens. Participants that do not receive monthly credits or forgiveness credits from PCAP may receive other benefits associated with being on the program.

In order to implement, programming changes are required. Due to this programming effort, it will be necessary to remove PCAP participants from the EPP approximately three months prior to the actual conversion date of the new program logic. This change will impact the monthly amount billed to PCAP participants and new

enrollments during this period. As a result, the Companies will stop collection activities for active participants from the effective date of the EPP removal until the conversion date. At conversion, all unpaid balances will become preprogram arrears which will be subject to arrears forgiveness credits. Customers will not be eligible for retroactive credits until a removal for failure to reverify or failure to participate in WARM has been processed under the new program. Customers will be notified by mail in advance of changes being made to their account. The communication will include an explanation of the change being made, who to contact with questions, and an overview of the upcoming program changes. A second communication will be mailed when the new program is implemented which announces the program change, defines changes to the bill statement, and explains program benefits.

The Companies are committed to rolling out the proposed modifications to the USECP as expeditiously as possible. However, the Companies' USECP approved on July 11, 2019 will continue to govern until the revisions herein are approved and the necessary information technology changes associated with the program are implemented.

## **CARES**

### **Overview and Objectives**

The CARES program provides assistance on a short-term basis to payment-troubled residential customers. Based upon the circumstances of each customer, the CARES representatives make referrals to social service agencies and provide information on appropriate Company and/or external programs. Many CARES referrals are subsequently enrolled into PCAP.

CARES supports community outreach events, such as the annual Be Utility Wise events sponsored by the Commission, annual hardship fund fundraisers, and senior fairs.

### **Eligibility**

Any customer experiencing a recent hardship such as:

- Serious illness or injury to a member of a household
- Death of a wage earner
- Marital or family problems
- Handicapped or disabled person
- Sudden loss of income to the household
- Any customer 60 years of age or over requiring special assistance

### **Tracking**

When tracking CARES referrals, basic account information is documented for the actions taken in response to the customers' situations.

### **CARES Organizational Structure**

A portion of the following employees' time supports this program:<sup>3</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

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<sup>3</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## Dollar Energy Fund

### Overview and Objectives

The Dollar Energy Fund ("Fund") is an emergency hardship fund designed to help residential customers who have suffered a recent financial hardship and need temporary help in paying their electric bill. The bulk of program funding is provided by contributions from the Companies' stockholders, employees, customers, and the Dollar Energy Fund. The application for funds is processed by the Dollar Energy Fund.

### Dates of Operation

The Fund accepts applications in accordance with pre-established account status guidelines, or if funds remain available. Program dates are as follows:

Period	Account Status
October 1 – November 30	Service Terminated or Pending Termination
December 1 – January 31	Service Terminated
February 1 – February 28	Service Terminated or Pending Termination
March 1 – September 30	Open to All Non-PCAP Customers  PCAP customers with Pending Termination or Service Terminated are also eligible  As the availability of funds reduces during this period, account status is subject to change until the program is closed based on priority: Service Terminated or Pending Termination, Service Terminated, or Closed.

### Maximum Grant Amount

One maximum grant of \$500 may be awarded to a customer during a program year.

### Contacts and Administering Agencies

The Companies' contact person is:

Leonard Howell, FirstEnergy Corp., 5001 Nasa Blvd, Fairmont, WV 26554  
Telephone: 681-753-5518; Email: lhowell@firstenergycorp.com

The Dollar Energy Fund contact person is:

Chad Quinn, Chief Executive Officer, The Dollar Energy Fund, Inc.,  
P. O. Box 42329, Pittsburgh, PA15203-0329  
Telephone: 412-390-3863; Email: cquinn@dollarenergy.org

## Eligibility Guidelines

- The residence must be a residential single home or apartment.
- The name on the account must be an adult resident.
  - Residency exception will be made for ratepayers assigned to active military duty.
- The applicant must provide income information.
  - Total household income (gross) must be at or below 250% of the Federal Poverty Income Guidelines (“FPIG”).
  - Exceptions will be made based on circumstances.
- The customer must have paid a minimum of \$150 on their account within the past 90 days or a minimum of \$100 if age 62 and over.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.
- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Companies’ reserve the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

## Dollar Energy Fund Organizational Structure

A portion of the following employees’ time supports this program.<sup>4</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services-Universal Service  
Business Analyst (2) – Various Levels  
Customer Accounting Associate (2) – Various Levels

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<sup>4</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

**Needs Assessments for Hardship Fund:**

The Hardship Fund Needs Assessment is based on income levels at or below 250% FPIG for all active residential accounts in arrears greater than 30 days at year end.

<b>Met-Ed Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	2,887	2,409
151% - 200%	5,039	4,159
≤ 150%	29,406	23,475
<b>Total</b>	<b>37,332</b>	<b>30,043</b>

<b>Penelec Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	2,864	2,474
151% - 200%	5,400	4,379
≤ 150%	35,311	28,569
<b>Total</b>	<b>43,575</b>	<b>35,422</b>

<b>Penn Power Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	675	594
151% - 200%	1,278	1,107
≤ 150%	7,885	6,788
<b>Total</b>	<b>9,828</b>	<b>8,489</b>

<b>West Penn Hardship Needs Assessment</b>		
<b>FPIG</b>	<b>2020</b>	<b>2021</b>
201% – 250%	3,171	2,621
151% - 200%	5,796	4,530
≤ 150%	33,367	26,406
<b>Total</b>	<b>42,334</b>	<b>33,557</b>

## **Gatekeeper Program**

### **Overview and Objectives**

Gatekeeper is a program where Company field personnel recognize and report customers who may be in "distress" as described below.

### **Eligibility Guidelines**

Situations include, but are not limited to, the following:

- Communication – A person who appears confused or disoriented
- Economic Condition – Someone expresses difficulty with paying bills
- Social Condition – Older persons living alone or socially isolated
- Physical Limitations – Severe difficulty seeing, speaking, hearing, or moving about
- Condition of Home – In need of repair, neglected yard, accumulation of newspapers, offensive odors, or unattended pets

### **Gatekeeper Organizational Structure**

A portion of the following employees' time supports this program.<sup>5</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

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<sup>5</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## PCAP

### Overview and Objectives

PCAP helps residential customers maintain electric service and eliminate past-due balances. PCAP offers a reduced bill to customers, based on a PIP and debt forgiveness. The objectives of PCAP are to:

- Improve a customer's payment ability and consistency
- Reduce a customer's consumption of electricity
- Eliminate debt

### Eligibility Requirements

- Total gross household income<sup>6</sup> is at or below 150% of FPIG.
- Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial to determine program eligibility.
- The Companies require households reporting zero income to complete a zero-income form. The form is a Commission-approved form that has been modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
  - Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits.
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

### Intake Process

Customers are required to complete an application to apply for PCAP, recertify eligibility, or to re-enroll after being removed from the program or when moving to a different operating company. If a customer final bills as a PCAP participant, the Companies use the following guidance to determine if a final billed PCAP participant is required to complete an application:

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<sup>6</sup> 66 Pa. C.S. § 1403: Definition of "**Household income.**" The combined gross income of all adults in a residential household who benefit from the public utility service.

- When an active participant moves out of a location, the PCAP program will follow the customer to the new location within the same operating company provided the original recertification date is a future date. PCAP will follow the customer and resume on the new account.
- If a customer is moving to a new location within the same operating company within 12 months of the last move-out date but the original recertification date is expired, PCAP will follow the customer to the new location and the customer will receive notification to complete recertification or be removed from the program within 3 months.
- If a customer is moving to a new location more than 12 months since the last move-out date and the original recertification date is expired, or if the customer is moving from one operating company to another, PCAP will not follow to the new account.

Dollar Energy Fund, Inc. is the current PCAP administrator for the Companies and processes the PCAP applications for new enrollments or recertifications into PCAP. The administrator can educate and assist the customer with referrals to assistance programs, such as WARM, the Dollar Energy Fund grant program or LIHEAP. Customers may apply for the program by contacting Dollar Energy Fund as follows:

- Call 888-282-6816
- Complete an online application at [dollarenergy.org/myapp](http://dollarenergy.org/myapp)

The administrator may also contact participants to initiate a text-to-recertify process. Data rates may apply.

While most applications may be processed by phone or online, the Companies reserve the right to request an in-office appointment. Dollar Energy Fund maintains contracts with other community-based organizations (CBOs) where customers can be directed to complete the application process on an as-needed basis.

During the initial call, customers may be asked to provide all household members' names, Social Security numbers ("SSN"), dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer.

If the SSN is not provided, the customer may submit copies of government issued IDs, such as driver's license, passport, ICE card, or ID from their country of origin, which includes full name, current address, photograph, and expiration date.

The documentation may be submitted by fax, mail, email or online, if an online application is submitted.

Fax: 412-515-1661  
Mail: Dollar Energy Fund, PO Box 42329, Pittsburgh, PA 15203  
Email: [FirstEnergy@DEFDocs.org](mailto:FirstEnergy@DEFDocs.org)  
Online: [dollarenergy.org/myapp](http://dollarenergy.org/myapp)

The completed records are downloaded to the Companies' host SAP system each business day in a single batch process. Upon successful completion of enrollment, the customer is notified by letter. After the initial billing of a new enrollment, communications will be made to the customer to describe the benefits of the program and the bill.

During this plan period, the Companies will be evaluating our intake system and processes for enhancements to provide improvements to the application process and/or submission of income documentation for customers.

**Percentage-of-Income Payment (“PIP”)**

The PIP is based on heat type, income, and federal poverty level.

Federal Poverty Level	Non-electric Heat Type	Electric Heat Type
< 50%	2%	6%
51 - 100%	4%	10%
101 – 150%	4%	10%

The monthly asked-to-pay amount is calculated as:

Monthly income \* % by Heat Type and FPIG = Percentage-of-Income Payment (PIP)

To control program costs and institute minimum payment requirements, the PIP will have a minimum established for customers per month.

Heat Type	Minimum Bill
Non-Electric	\$12
Electric	\$45

Examples:

Monthly income = \$1200  
 FPIG = 51-100%  
 Heat type = Non-electric  
 PIP percentage = 4%  
 $\$1200 * 4\% = \$48$   
 The customer’s monthly PIP is \$48.

Monthly income = \$500  
 FPIG = < 50%  
 Heat type = Non-electric  
 PIP percentage = 2%  
 $\$500 * 2\% = \$10$   
 The calculated PIP is \$10; however, the minimum bill is \$12. The customer’s monthly PIP will be \$12.

PCAP participants will be asked to pay either the percentage-of-income payment or the actual charges each month. If the actual charges are less than the percentage-of-income payment, the customer will be asked to pay the actual charges. If the actual charges are more than the percentage-of-income payment, the customer will be asked to pay the PIP amount and a subsidy credit will apply to the difference.

Examples:

Actual charges = \$100

PIP = \$75

- Customer will receive a \$25 PCAP credit and will be asked to pay \$75.

Actual charges = \$75

PIP = 100

- Customer will not receive a PCAP credit and will be asked to pay \$75.

The PIP will be prorated for bill periods that are less than 26 days.

Based on the changes in this program, quarterly account monitoring becomes unnecessary. The Companies' revised PCAP program will offer one billing method that automatically bills the customer the PIP or the actual charges, whichever is less, making it unnecessary to evaluate the billing method quarterly.

Annually, the Companies will identify participants that had annual usage for the calendar year exceeding 125% of the participant's prior year usage provided the customer resided at the same location during that time. For these participants, the Companies will complete outreach quarterly throughout the following year to provide energy conservation messages when customers are not exempt. All participants are evaluated for the WARM program at enrollment or scheduled recertification. As the Companies schedule WARM jobs with contractors, jobs with the highest usage are prioritized first.

When customers exceed 125% of the historical usage, the account will be reviewed to determine if the account can be identified as exempt from the consumption limits. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household's ability to control.
- The household is located in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

### **Debt Forgiveness Guidelines**

When entering PCAP for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When entering PCAP under the USECP 2024-2028 plan for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When recertifying for PCAP following the first enrollment, additional dollars are not deferred (past due PCAP bills).

For participants removed from PCAP, preprogram debt is due and subject to collection activity. Customers are responsible to pay all charges including preprogram balances.

When re-enrolling into PCAP, all preprogram debt will be deferred and included in the PCAP debt forgiveness component if the initial deferral was \$300 or less. If the initial deferral was more than \$300, only the remaining (not yet forgiven or paid) preprogram debt from the first PCAP enrollment will be re-deferred and included in the PCAP debt forgiveness component. All other past-due, ask-to-pay

amounts on the bill will remain due and subject to collection activity after either re-enrollment or re-certification into the program.

While a participant, debt forgiveness credits (1/12 of preprogram debt) will be awarded retroactively in response to full monthly bills being paid, whenever those payments occur, regardless of PCAP arrears. Debt forgiveness credits will be applied in response to any type of payment or credit, including assistance grants, which paid the bill in full. When awarded, credits are applied at monthly billing. PCAP participants must remain in the Company's standard residential billing cycle (twenty-day due date) for debt forgiveness credits to be awarded by the host computer system.

When the full preprogram debt has been forgiven and they no longer have a preprogram arrearage balance, a customer is no longer eligible for debt forgiveness, but the account will remain in PCAP.

### **Default Provisions**

PCAP customers who fail to make timely bill payments will be subject to the collection cycle.<sup>7</sup>

Dunning notices, including termination notices, will be issued for any unpaid current bills. Deferred preprogram debt balances will not be included in dunning notices. PCAP participants who do not make payments in accordance with the terms of the program will remain in PCAP and be subject to PCAP dunning processes, up to and including service termination. PCAP dunning processes include all the notification and procedural steps required by 52 Pa. Code § Chapter 56.1, *et seq.*, and 66 Pa. C.S. § Chapter 1401, *et seq.* The Companies are compliant with the CAP Policy Statement and initiate collection activity for CAP accounts after no more than two payments are in arrears. Participants are not removed or defaulted from PCAP as a precursor to termination for non-payment.

Payment requirements to avoid termination of service:  
Past due charges are brought current.

Payment requirements for restoration of service following service termination:  
Past due charges are brought current, and  
Reconnection fee per the current tariff is paid.

### **Dismissal from PCAP and Re-entry into PCAP**

Participants may be removed from PCAP for any of the following reasons:

1. Refusing to participate in WARM if eligible (re-entry is dependent on application for the WARM program)
2. Failing to recertify as scheduled, or upon request (re-entry is dependent on completion of re-certification procedures)
3. Theft of service (re-entry prohibited for six months)
4. Other actions deemed to be intentional and fraudulent (re-entry prohibited for six months)
5. Other actions, including but not limited to, failure to permit scheduled meter readings, unreasonable and/or increased consumption post-WARM measures installation, and pattern of

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<sup>7</sup> *Guidelines for Universal Service and Energy Conservation Programs*, Docket No. M-00960890F0010 (Final Order entered Jul. 10, 1997). Under Customer Assistance Programs, Default Provisions: "The Commission believes that the consequences for nonpayment should be loss of service; therefore, we recommend that participants who do not make payments should be returned to the regular collection cycle."

returned check may result in disconnection of service and final billing or removal from the program.

After removal from PCAP, customers may re-apply to PCAP if they resolve the reason for dismissal and meet the eligibility parameters identified above.

Upon re-entry to PCAP (within the same operating company) after removal for failure to recertify income or failure to participate in WARM, customer accounts may receive missed subsidy and/or forgiveness credits for months billed while not in PCAP if the account was removed within the past 12 months. After 12 months of removal, PCAP applicants are no longer eligible for retroactive subsidy and/or forgiveness credits. Any remaining amount will be due by the PCAP participant.

- Missed subsidy credits will not be applied for an amount that exceeds the account balance less remaining unpaid preprogram arrearages and/or miscellaneous fees.
- When a customer removed from PCAP moves from one location to the next within the same operating company, the missed credits will only be applied if the customer enrolls for the first account activated following the final account where PCAP was removed.
- Missed forgiveness credits will not be applied for an amount that exceeds the remaining unpaid preprogram arrearages and is only applied for full monthly bills that were paid.

Customers that re-enroll more than 12 months after removal from the program are not eligible for retroactive forgiveness or subsidy credits. For those customers, only the remaining unpaid preprogram debt will be re-deferred at enrollment for future arrears forgiveness unless the initial balance deferred was less than \$300 as described previously in Debt Forgiveness Guidelines.

Customers removed for any reason other than failure to recertify or failure to participate in WARM are not eligible for retroactive credits at any time.

### **Recertification Requirements**

PCAP participants are advised at the time of application that they are required to recertify eligibility as scheduled or when there is a change in gross household income, household size, or heat source. Customers will be able to recertify over the telephone, online, or by mail. A notice to recertify is mailed to PCAP participants 60 days prior to the benefit end date including information on when benefits will expire and how to complete the recertification process. A message is printed on the participant's electric bill at this time. If necessary, a message is printed on the participant's electric bill 30 days prior to the benefit end date and a reminder letter is mailed. Reminder calls will be placed to the customer at 45 and 15 days prior to the recertification date. If the customer does not successfully complete recertification, the account will be removed from PCAP. Once removed, the customer will receive a letter that explains the account has been removed from PCAP for failure to recertify and provides instructions on how to reapply.

To recertify, PCAP participants will be required to submit the required household income and household member information by U.S. mail, fax, or online, if applying online. Dollar Energy Fund may also contact participants to complete recertification via text message. Data rates may apply.

Completed enrollment or recertification records are transferred to the SAP host system each business day through a batch process, which extends the Benefits End Date based on the income source.

The period for recertification will vary based on income source as follows:

Income Source	Recertification Period
Zero-Income	6 months
SSI, Disability, Pension	3 years
All others	2 years

In addition, when a customer receives LIHEAP benefits, the recertification period may be increased one year provided the recertification period does not exceed 3 years. Completion of a PCAP application is required at least every 3 years. This LIHEAP extension does not apply to customers identified as Zero-Income or participants that already have a 3-year recertification period.

### **Application of Customer Payments and Assistance Grants**

Customer payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

Assistance Grants:

#### LIHEAP

LIHEAP helps eligible customers on low or limited incomes pay their heating bills through energy assistance grants. A customer is not required to have an unpaid bill to receive energy assistance. The Department of Human Services (“DHS”) administers LIHEAP and establishes dates in which LIHEAP is available. Various efforts, such as bill inserts, letters, call campaigns, social media and customer referrals are attempted to encourage customers to pursue LIHEAP funds when available. All eligible customers are encouraged to apply for LIHEAP benefits.

LIHEAP payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation) or in accordance with DHS’ directives stated in the annual LIHEAP State Plans

#### Dollar Energy Fund

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

### **Excess PCAP Credits**

Subsidy credits are not included in refund checks issued to customers. Subsidy credits will be adjusted from the customer’s account balance when:

- The subsidy credit exceeds the total account balance, and a final bill has been issued. If the customer established another account within the same operating company, the excess credits may be transferred to the new account instead.
- The subsidy credit exceeds the total account balance, and the credit has been open for 18 months or more.

### **Program Delivery Partners**

The Companies will continue the use of CBOs referenced in Attachment A for the daily administration of the USECP. The Companies currently contract with Dollar Energy Fund as the administrator for PCAP applications and recertifications, grant applications, and referrals to WARM and other assistance programs. Dollar Energy Fund is a non-profit agency with an established network of CBOs to process intake for assistance programs and grants.

### **Quality Assurance Provisions**

During each calendar year, a representative of the Companies, or their designee, shall audit the PCAP administrator to verify proper administrative processes have been performed in support of the PCAP application and recertification process. The areas of performance to be audited include, but are not limited to:

- Auditor received requested documents
- Case note documented for each customer contact
- Account status document reviewed
- Application completed when applicable
- Recertification completed when applicable
- Referred clients to other program(s) when applicable
- Proper documentation retained
- Hardcopy documentation recorded accurately
- Successfully enrolled clients into PCAP when applicable
- Measure administrator level of service

A combination of applications and recertifications processed by the administrator for the Companies shall be reviewed during an audit. A sample size calculator will be used to identify a statistically significant sample size for the applications and recertifications. With the sample size calculator, the standard variables used will be a confidence level of 95% and a confidence interval of 5%.

Human Services prepares the designee, if any, with program information and reviews the audit expectations. The designee reviews each selected application to confirm the administrator followed the appropriate procedure in the application process. The results are tracked in a spreadsheet and reviewed with the Companies. The Companies and administrator discuss the audit results and coordinate the sharing of information to reinforce training with the administrator's staff and/or identify areas for improvement in workflow processing or technology.

### **Assessment of Security Deposits**

Security deposits are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

## Assessment of Late Payment Charges

Late payment charges are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

## Customer Choice

Per the Commission Order dated August 4, 2022, for the Joint Petition for Partial Settlement of the Default Service Plan<sup>8</sup>, customers enrolled in PCAP may not receive service from an electric generation supplier effective June 1, 2023.

## Consumer Education, Outreach and Referral

As a PCAP participant, customers receive the following communications:

- Enrollment letter
- Recertification letter
- Reminder recertification letter with form, if needed
- Removal letter, if needed
- Quarterly mailings with energy conservation information when participants' usage increased 25% compared to the prior year of service at the same location
- Outbound calls are also completed as part of the recertification process

As a PCAP applicant, customers receive the following outreach:

- Email notifications from Dollar Energy Fund's MyApp online application when income documents are required
- Email notifications 7 days after the MyApp application is started if documentation has not been received
- Outbound calls from the Companies to remind the customer the application is pending required documentation
- Mailed copy of the PCAP agreement when application is submitted

Outreach to promote energy assistance program enrollment to customers 0-50% FPIG and higher is completed as follows:

- Outbound call campaigns in the 1<sup>st</sup> and 4<sup>th</sup> quarter to promote LIHEAP CASH and CRISIS
- Participation in the CRISIS Utility File Transfer (UFT) program
- Participation in the Turn On program, when open
- Outbound call campaigns to promote PCAP enrollment
- Email campaigns to promote PCAP enrollment
- Bill inserts to promote all assistance programs
- Letters are mailed to LIHEAP recipients not currently participating in PCAP
- News release to promote all assistance programs twice per year
- Monthly social media messages to promote an active program or assistance in general
- Radio commercials to promote LIHEAP or PCAP

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<sup>8</sup> *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Its Default Service Plan for the Period from June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, P-2021-3030021 (Order entered August 4, 2022).*

- Corporate website provides information for assistance programs along with an interactive tool to help determine income eligibility.
- On hold message to direct customers to our website for assistance information
- Provide education and promote enrollment to customers or agencies via Be Utility Wise, senior fairs, expos, etc.
- Distribute printed materials to community agencies
- Door hangers for field collections
- Referral information included on letters related to credit denial, security deposits, termination, etc.
- Referral information provided to customers during inbound contacts

The Companies make the following available to Spanish-speaking customers:

- PCAP agreement
- Program letters include Spanish verbiage
- PCAP brochures for distribution, live events, or online reference
- PA LIHEAP bill insert includes Spanish verbiage
- Dollar Energy Fund is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers.
- The Companies have interpreting services available for inbound inquiries

With the implementation of a revised PCAP program, the Companies will establish opportunities for community agencies to attend universal service training. A schedule of these events and venue (virtual, in-person or both) will be determined based on the known circumstances, such as weather, health and safety considerations.

### **PA Customer Assistance Program Organizational Structure**

A portion of the following employees' time supports this program.<sup>9</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services – Universal Service  
Business Analyst (7) – Various Levels  
Customer Accounting Associate (2) – Various Levels

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<sup>9</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

## **WARM Program**

### **Program Overview and Objectives**

The WARM program is the name of the Companies' Low Income Usage Reduction Program (LIURP). The program provides energy education and energy conservation measures and services to low-income customers.

The program targets low-income customers who participate in PCAP or LIHEAP. The program's primary objectives are to:

1. Reduce the overall energy use, energy bills, and arrearages of low-income customers
2. Improve participants' health, safety, and comfort in their homes
3. Make personalized referrals to the Companies' USECP and other assistance programs

WARM achieves these objectives through two approaches. First, energy conservation improvements are installed, and inefficient appliances are replaced in the customer's home. Second, an energy conservation auditor provides energy education to family members and refers them to other potentially beneficial social service programs. All work performed through the WARM program is provided at no cost to program participants.

### **Eligibility Guidelines**

#### Income Eligibility:

Residential customers are eligible for WARM if their household income is at or below 150% of the FPIG.

The Companies also provide WARM services to customers with special needs whose household income is between 151% and 200% of FPIG. Commission regulations allow up to 20% of the WARM budget to be used for these customers. The definition has always included customers with overdue account balances, and the Companies also include those households with medical problems, personal crisis situations, and loss of income. This allows more customers under 200% of FPIG to participate in the program without requiring or encouraging an account arrearage.

#### Electric Use Eligibility and PCAP Participation Provision:

Customers who meet program income guidelines and have annual electric usage of 6,500 kWh or more annually will qualify. If customers participate in PCAP and have annual electric usage of 6,500 kWh or more, they are required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Such customers can refuse to have any of the recommended energy conservation measures installed.

PCAP customers that refuse to receive an in-home energy evaluation and work with a trained energy educator may be removed from PCAP. PCAP benefits will be retroactively applied should the PCAP customer later choose to participate within 12 months. Before a customer would be removed from PCAP, multiple attempts will be made to contact the customer using both phone calls and letters.

No minimum usage will be required for customers who are having their WARM services coordinated with the PA Weatherization Assistance Program (“WAP”) or with a Natural Gas Distribution Company (“NGDC”), such that most services are provided at the same time. In these cases, and when a fossil fuel heating system is present, the majority of full-service weatherization measures must be paid for by other program partners, and the costs of these measures must be documented in the program management system.

Some PCAP participants do not qualify for WARM because their electricity use does not meet the annual minimum. Other customers are limited in their ability to participate because their landlords will not agree to WARM services.

#### Residency Eligibility:

The customer must reside at the service address and have a minimum of 6 months of consecutive service. Both homeowners and renters qualify for the program; however, renters must obtain landlord approval for measures to be installed at the customer’s home that reduce seasonal kWh use, such as air sealing and insulation. If landlord approval is not received, only baseload measures will be installed (e.g., smart power strips, LED lightbulbs and refrigerator or freezer replacement if the appliance is owned by the customer).

The customer must agree to share his or her electric use information with the Companies’ agencies/contractors. In addition, the customer must allow contractors to have access to the home to perform appropriate program measures and quality assurance inspections.

Homes previously served by the program may receive WARM services again after 5 years if the home continues to have significant electric use or at the Companies’ discretion.

#### **Marketing**

To reach this customer segment, the application intake process for the PCAP and WARM programs has been streamlined to determine a customer’s eligibility for both programs at the same time. This process has proven to be a cost-effective holistic approach to helping low-income customers who could benefit from these programs.

All letters and applications are available in Spanish, and the WARM program uses a translation service for customers who speak a language other than English.

Geographic marketing tactics include a combination of mass communication vehicles and one-on-one communications, such as newspaper, cable TV, search engine marketing, bill inserts, and direct mail campaigns. Community presentations are also used to inform customers about the program.

A bill insert about customer assistance programs, including the WARM program, is sent annually to all residential customers. Program information and eligibility requirements are also shared with customers during fall and winter collection activities and distributed in customer winter surveys.

Cross-marketing with Act 129 programs is optimized. Customers may obtain program information by: 1) accessing the Companies’ *energysavepa.com* website; 2) reviewing program materials provided to them when they participate in the Act 129 appliance recycling program and/or appliance rebate program; and 3) receiving program advertisements included in customized Home Energy Reports.

The Companies plan to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, social media, and piloting

creative incentives to help identify and provide services to customers in need. The Companies also plan to update materials used in outreach efforts.

### **Heating and Cooling Budget Calculation Per Home**

The selection of measures designed to reduce electric heating and cooling is guided by a cost-effective budget calculation (seasonal allowance) for each home, based on past electric consumption with consideration also given to the regulatory seven- to twelve-year payback requirement. This calculation tool for contractors and agencies is not an absolute or prescriptive target for WARM. During the audit, if the site or customer needs are greater than the calculated budget, the contractor or agency will confer with the Company program manager after documenting reasons for proposing to go beyond the budget. The Company will decide to what extent additional work may be performed. This procedure allows higher budgets on higher-energy-use homes and prevents substantial use of funds on low-use homes where the potential for energy savings is less.

Increases in this seasonal allowance calculation are periodically implemented to keep pace with agency/contractor price increases.

The Commission previously granted the Companies a temporary partial waiver of the LIURP regulation at Section 58.11(a) that restricts each installed measure to a payback period of seven or twelve years. The waiver shall apply only to heating jobs for which the audit indicates the home should receive comprehensive measures. The overall job must still be cost-effective and otherwise meet LIURP regulations. The Companies request continuing applicability of this waiver to the Companies' USECP.

Baseload electric measures and appliance replacements are based upon on-site auditing and monitoring of energy use of the existing appliances. The replacement thresholds and procedures are updated periodically to reflect changes in costs and/or efficiencies.

### **Energy Saving Measures**

The specific measures installed, and actions taken are dependent on the customer's heat type, electric use, testing of appliances and diagnostic audit results. Customers and landlords have the right to refuse recommended measures. Contractors and agencies are required to install measures according to the program priority list found in the WARM Policy and Procedures Manual. Contractors are encouraged to consider cost effective custom measures and strive to meet relevant payback periods. Agencies and contractors provide one-year warranties on most measures and manufacturers may provide additional warranties. The following list identifies some of the measures that customers may receive through the WARM program:

- Blower door with pressure diagnostics to guide air sealing and duct sealing
- Attic, duct, basement, crawlspace, and perimeter air sealing (caulking, foam insulation & weather-stripping)
- Attic, wall, duct, floor, crawlspace, and perimeter insulation
- Sealing and insulating attic hatches
- Boxing and damming of attic heat producing fixtures
- Refrigerator replacement
- Freezer replacement
- Water heater replacement
- Heat pump water heaters
- Water heater pipe insulation
- Some aerator and showerhead replacement

- Some storm and prime window and door repair or replacement
- Reflective window tint to reduce cooling use
- Reflective roof coat to reduce cooling use
- Window/wall air conditioning unit replacement
- Some heating and air conditioning system replacement
- Electric dryer venting installation, repair, or replacement
- Clothesline installation
- Heated waterbed mattress replacement
- Some plumbing and electrical repairs
- Installing new exhaust fans
- Repair and replacement of exhaust fans
- Thermostat replacement/repair
- Air conditioning/heating system filter replacement
- Appliance and water heater timers
- Smart power strips
- Furnace whistle
- Energy education
- Remedial education as needed
- Smoke alarms
- CO detectors
- LED lighting
- Dehumidifier replacements
- Site specific health and safety measures, such as carbon monoxide detectors
- Custom measures, (i.e., well pump or holding tank replacements, etc.)

### **Energy Education**

The Companies and agencies/contractors use a proven partnership approach with the customer. The customer is asked to partner with the program agency/contractor to develop energy savings strategies designed specifically to address the highest energy use areas of the home and its occupants. Auditors help customers understand what is driving their electricity usage by putting costs on choices and behaviors. Then the auditor and customer sign partnership and savings strategy agreements.

Approximately 6 months after the completion of WARM services, the Company sends customers congratulatory letters when usage has decreased more than 5% when compared to the same months before WARM services. A list of customers whose usage has increased more than 10% is provided to agencies/contractors for a follow-up phone call and visit to the customer if necessary. The agency/contractor will check if measures are working properly and whether the customer understands how to use them or if lifestyle or structural changes created the increased electric use.

Another education resource for WARM program participants is the Act 129 program Home Energy Reports that include customized energy education messaging. These reports are sent to a subset of customers that have been identified as low-income customers, including WARM participants.

The Companies will continue to evaluate educational materials and tools for customers and auditors and make updates as needed.

## Companies' Organizational Structure

A portion of the following employees' time supports the program.<sup>10</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services – Energy Conservation  
Business Analyst (9) – Various Levels  
Customer Accounting Associate (1)

## Program Delivery

The Companies contract with a network of CBOs and energy conservation contractors, referenced in Attachment A of this plan, to deliver program services. CBOs and energy conservation contractors may be eligible for incentives if they meet performance goals.

Program auditors or crew members, who make decisions about what measures will be installed in the home and who perform the combustion safety testing procedures, must be Building Performance Institute (BPI) certified as Building Analyst Professionals. BPI is a national standards development and credentialing organization for residential energy efficiency retrofit work. It is a non-profit organization that also provides training through a network of training affiliate organizations. The Companies sponsor agency and contractor attendance at national and regional ACI Home Performance Conferences to allow agencies/contractors to obtain continuing education credits needed to retain their BPI certification.

The Companies also hold WARM program training specific to USECP procedural issues or to meet the training needs of auditors and crew members. The Companies recognize that CBOs and energy conservation contractors have seen an increase in staff turnover since the pandemic began. During the plan years, the Companies will continue to focus on training, utilizing webinars, in-person group sessions when practical, and one-on-one training when needed. Topics of emphasis will include:

- Auditing training for new auditors utilizing newly developed and timely materials
- Overcoming barriers to the installation of energy conservation measures
- Policy and procedure updates

The Companies and its contractors benefitted greatly from the roll out of the Low- Income Energy Conservation and Energy Efficiency Network or LEEN program management and tracking system in 2019. The LEEN system:

- Facilitates workload management through the use of work queues
- Promotes effective communication and documentation through an enhanced user

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<sup>10</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded.

messaging system

- Provides dashboards to give graphical representations of progress towards goals
- Has robust reporting capabilities
- Features the automatic retrieval of customer information system data at the time of job creation, etc.

Future enhancements proposed for LEEN include:

- Invoice payment and SAP cost accounting system integration
- Incorporating the WARM energy audit into LEEN

### **Quality Assurance Provisions**

The Companies plan to maintain the same level of third-party quality assurance inspections, inspecting 35% of total production. The quality assurance contractors will continue to focus the majority of their inspections on homes that have electric heat as well as supplemental electric heating or air conditioning. Greater oversight is needed in these homes because of the installation of comprehensive measures and combustion safety testing. The quality assurance contractor also delivers, or coordinates auditor, crew, and group training as needed and provides mentoring to new energy auditors.

The Companies continue to use a WARM Advisory Panel that meets 2 to 3 times per year and is on-call year-round. The panel members consist of agency and contractor auditors, and program managers from across Pennsylvania along with principal WARM quality assurance inspectors. The members have direct contact with customers and other assistance programs in other states. They provide suggestions for program improvement, research new technologies, and test new measures and products.

Company program managers meet with all agencies and contractors annually to share program changes and solicit feedback. Company program managers work closely with individual agencies and contractors, often observing audits and crew work in the field.

The Companies also strive to defer to the Department of Energy National Standard Work Specifications-based quality control inspection protocols on jobs coordinated with WAP where possible and practical.

### **Coordination of Services**

As recommended by the Commission, the Companies will continue to direct agencies and contractors to coordinate delivery of WARM benefits with other programs. The Companies work with WAP and NGDCs to coordinate delivery. Although coordination may allow for the efficient use of funding sources and resources, coordination may impact the program's overall electric energy savings. This is due to the fact that the customers identified by NGDCs or WAP might not be the highest electric users targeted for participation in the WARM program. When a surplus of low-income customers exists, the Companies continue to prioritize customers by highest energy use first. Most WARM jobs are coordinated with an Act 129 program.

The Companies continue to find that many WARM participants are using supplemental electric heat in the winter even though the primary source of heat in the home is something other than electricity. Since this is a frequent occurrence, the Companies strive to reduce the customer's supplemental electric heat use by coordinating services with the WAP and NGDC LIURP programs to repair gas or oil heating systems where possible.

To increase the accuracy of reporting coordinated jobs with other programs, functionality was added to the LEEN system that requires contractors to document coordinated job information.

The Companies will continue to provide energy usage data to the Department of Community and Economic Development to assist in its WAP energy saving studies.

## Health and Safety

Health and safety measures are installed to allow WARM contractors to proceed with the installation of energy-saving measures at a customer's home. The purpose of health and safety measures is to ensure that WARM's energy-saving measures may be installed and operate safely. Examples of such measures include:

- Roof repairs
- Knob and tube wiring remediation
- Damming of heat producing light fixtures; and
- Flue repairs

Certain health and safety measures may help protect a home's occupants, but typically do not lead to reduced electricity usage. Such measures include, but are not limited to:

- Smoke alarms and carbon monoxide detectors; and
- Pressure relief valves and overflow pipes on water heaters.

Where customers have a fossil fuel heating system, the Companies perform combustion safety testing to ensure safe use of combustion appliances/systems whenever measures are installed that impact the building envelop (e.g., air sealing). WARM contractors adhere to the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 62.2 ventilation standards.

The Companies allow up to 50% of the seasonal allowance to be spent on health and safety measures. This is in addition to the seasonal allowance funds to install energy reduction measures. Contractors are encouraged to reach out to their Company program manager when additional health and safety funds are needed to fully address barriers to the installation of energy reduction measures.

## Reporting

The following reports are submitted to the Commission or Department of Human Services on an annual basis:

- |   |          |
|---|----------|
| - LIURP production, expenditures, cost of jobs and goals report | March 1  |
| - Universal Service Program (LIURP Section)                     | April 1  |
| - Conservation economics and energy planning bureau report      | April 30 |
| - LIURP annual energy savings impact evaluation                 | April 30 |

## LIURP Needs Assessments

The Companies currently project there are approximately 76,411 potential LIURP participants in the Met-Ed service territory with incomes at or below 150% of Federal Poverty Income Guidelines (FPIG). The comparable totals for Penelec, Penn Power and West Penn are 72,573, 16,416 and 1616,497, respectively. Details of the Companies needs assessments are shown below, including estimates of potential LIURP participants with incomes 151-200% of FPIG.

FirstEnergy LIURP Needs Assessments				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Total Residential Customers (December 2021)</b>	513,743	501,640	143,672	632,933
<b>Number of Customers with Incomes at or Below 150% of FPIG</b>	109,200	146,334	34,284	150,565
Usage at or Above 6,500 kWh per Year	88,452	88,532	21,942	126,023
Received WARM in the Last Five Years	5,545	8,800	3,264	4,716
Less than Six Months of Usage History	1,520	1,467	327	1,238
Renters Projected where LL Refused	1,265	916	313	650
Projected to Drop Out	3,362	4,365	1,588	1,251
Number of Customers Receiving Services - Act 129	349	411	34	1,671
<b>Total Potential Participants</b>	<b>76,411</b>	<b>72,573</b>	<b>16,416</b>	<b>116,497</b>
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 389,741,946.60	\$ 214,525,788.00	\$ 66,109,366.08	\$ 722,509,734.12
Estimated Renters	74,243	43,577	9,467	57,316
<b>Number of Customers with Incomes 151-200% of FPIG</b>	<b>48,355</b>	<b>57,086</b>	<b>14,856</b>	<b>60,818</b>
Usage at or Above 6,500 kWh per Year	39,168	34,537	9,508	50,905
Received WARM in the Last Five Years	1,259	1,099	437	711
Less than Six Months of Usage History	673	572	142	500
Renters Projected where LL Refused	942	714	127	222
Projected to Drop Out	763	545	212	189
<b>Total Potential Participants</b>	<b>35,531</b>	<b>31,607</b>	<b>8,590</b>	<b>49,283</b>
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 181,230,057.80	\$ 93,431,000.45	\$ 34,593,008.16	\$ 305,651,194.68
Estimated Renters	25,421	13,560	3,844	19,579

### Met-Ed LIURP Needs Assessment

<b>Total Residential Customers (December 2021)</b>	513,743
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	109,200
Percent of Residential Customers Below 150% of FPIG	21.30%
Estimated Number of Potential Program Participants	35,405

### Penelec LIURP Needs Assessment

<b>Total Residential Customers (December 2021)</b>	501,640
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	146,334
Percent of Residential Customers Below 150% of FPIG	29.20%
Estimated Number of Potential Program Participants	36,205

**Penn Power LIURP Needs Assessment**

<b>Total Residential Customers (December 2021)</b>	143,672
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	34,284
Percent of Residential Customers Below 150% of FPIG	23.10%
Estimated Number of Potential Program Participants	7,068

**West Penn LIURP Needs Assessment**

<b>Total Residential Customers (December 2021)</b>	632,933
Number of Customers Below 150% of Federal Poverty Income Guidelines (FPIG)	150,565
Percent of Residential Customers Below 150% of FPIG	23.80%
Estimated Number of Potential Program Participants	66,895

**Funding and Enrollment Goals<sup>11</sup>**

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<sup>11</sup> The WARM budgets are based on projected WARM enrollment levels for the 2024 through 2028 program years. However, where a budget is overestimated in the USECP for one program year, the Companies will roll over this excess budget amount from one program year to the next consistent with the Companies' last base rate settlement. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016- 2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R- 2016-2537359 (Opinion and Order entered Jan. 19, 2017).

**Met-Ed**

<b>Year</b>	<b>Budget</b>	<b>Participant Goals</b>
2024	\$6,916,000	1,000
2025	\$7,250,660	1,000
2026	\$7,601,473	1,000
2027	\$7,753,503	1,000
2028	\$7,908,573	1,000

**Penelec**

<b>Year</b>	<b>Budget</b>	<b>Participant Goals</b>
2024	\$7,490,000	1,735
2025	\$7,639,860	1,735
2026	\$7,792,897	1,735
2027	\$7,948,755	1,735
2028	\$8,107,730	1,735

**Penn Power**

<b>Year</b>	<b>Budget</b>	<b>Participant Goals</b>
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

**West Penn Power**

<b>Year</b>	<b>Budget</b>	<b>Participant Goals</b>
2024	\$7,327,000	970
2025	\$7,473,560	970
2026	\$7,624,251	970
2027	\$7,776,736	970
2028	\$7,932,271	970

**Met-Ed**

<b>Year</b>	<b>Budget</b>	<b>Participant Goals</b>
2024	\$6,916,000	1,000
2025	\$7,315,640	1,000
2026	\$7,738,952	1,000
2027	\$8,187,350	1,000
2028	\$8,662,333	1,000

Penelec		
Year	Budget	Participant Goals
2024	\$7,890,000	1,735
2025	\$8,345,680	1,735
2026	\$8,828,346	1,735
2027	\$9,339,611	1,735
2028	\$9,881,183	1,735

Penn Power		
Year	Budget	Participant Goals
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

West Penn Power		
Year	Budget	Participant Goals
2024	\$8,578,000	1,000
2025	\$9,079,560	1,000
2026	\$9,610,951	1,000
2027	\$10,173,958	1,000
2028	\$10,770,473	1,000

In general, the average cost of serving WARM participants' homes has increased over the years due to measure price increases, particularly since the beginning of the COVID-19 pandemic. Also, seasonal load reduction measures continue to be installed in homes using electric space heaters in lieu of fossil fuel heaters. Homes that previously were classified as water heat or baseload jobs that received lighting, refrigerator replacements and water heat reduction measures require attic air sealing, insulation, and combustion safety tests in many cases. Due to the increased complexity of the measures, it also takes more days to serve these homes, which prevents agencies and contractors from serving the same number of homes as under prior plans. The Companies continue to stress with contractors that they need to overcome barriers to the installation of measures wherever possible.

Participant goals are also consistent with the Companies' experience in a post-COVID-19 world where contractors continue to struggle to maintain adequate staffing levels. Also, the Companies are finding it difficult to find enough customers willing to participate in WARM in certain areas of their service territory, particularly Penn Power. Holding participant goals at the levels proposed will allow spending per home to gradually increase over the term of the plan. The Companies propose that any unspent funds from the current plan period be carried over into the new plan period as reserve funds.



## Summary of Proposed Program Additions and Modifications

### PCAP

All changes approved by the Commission for the 2024-2028 plan will be effective after the relevant information technology changes are made. The previously approved plan will remain effective until such IT changes are adopted. The following program modifications are included in this plan for PCAP as compared to the Companies' current USECP approved on July 11, 2019:

1. PCAP will be converted from a fixed credit program to a percentage-of-income payment program, which does not involve the equal payment plan or a minimum energy burden. The participant will be billed a percentage-of-income payment or the actual charges, whichever is less. Percentage-of-income payments are based on federal poverty level, heat type, and income as defined in the 2019 Amended CAP Policy Statement.
2. The Companies will continue utilizing the Commission-approved zero-income form modified for completion telephonically.
3. The Companies are introducing a customer education and outreach plan.
4. The Companies affirmatively acknowledge that they accept income documentation of 30 days or 12 months, whichever is more beneficial.
5. The Companies propose income documentation will not be required during application or recertification when the customer is known to be a LIHEAP recipient within the last 12 months from the date of the application. Income information will be obtained verbally to complete the application.
6. Subsidy maximums will be eliminated to ensure customers' bills maintain affordability and align with the percentage of income guidelines established in the 2019 Amended CAP Policy Statement based on federal poverty levels and heat type.
7. Recertification periods will be modified to align with the CAP Policy Statement based on income source and/or receipt of LIHEAP.
8. Suspension period will be eliminated as part of the recertification process.
9. Debt forgiveness period will be changed from 36 months to 12 months.
10. Remove dismissal due to a minimum energy burden requirement (aka graduated)
11. The requirement to participate in the equal payment plan has been eliminated.
12. Retroactive credits will be provided to participants removed from PCAP due to failure to participate in the WARM.

### WARM

The following program modifications are included in this plan for WARM:

1. If customers participate in PCAP, they will be required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Failure to do so may result in the customer being removed from PCAP. Customers who are removed from PCAP that later decide to participate in WARM within 12 months will have the PCAP subsidy and/or forgiveness credits applied retroactively.
2. The Companies plan to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, and social media to help identify and provide services to customers in need. The Companies also plan to update materials used in outreach efforts.

## **Applied Technologies in Support of Universal Service Programs**

The Companies employ various technologies to promote an efficient delivery of their USECP. Some of the more significant technologies are described below:

### **C-Net On-line Help System**

C-Net On-Line Help System is a Microsoft Office application called SharePoint. C-Net provides the Companies' Customer Contact Centers and the Human Services department employees with detailed on-line information on federal and state programs and the Companies' USECP.

### **SAP**

SAP is the Companies' host computer system containing the customer master file.

### **Human Services Web Site**

The Human Services web site allows CBOs to easily obtain current customer billing, payment, energy use and other information while evaluating customers' energy assistance applications without Customer Contact Center or Human Services involvement. Entry to the site is password protected.

### **LEEN System**

The LEEN system is a web-based system used to assist inspectors, contractors, and the Companies' administrators in their management of the WARM program. This system replaced the WARM system. Some features include:

- Streamlined security role structure
- SAP integration for application entry and job status
- Enhanced job assignment process
- Enhanced job status reports for quality assurance staff and program managers
- Invoice management process
- Work queues functionality
- Required fields to support the documentation and reporting of coordinated jobs

### **Application Intake System**

The Companies are currently developing a new web-based application system for PCAP and WARM applications. The intent of the system is to provide an administrator the ability to take applications by phone or mail, as well as provide customers a tool for self-service. The application will provide document storage, historical records, and limited SAP integration. The system will provide automated updates to customers as the application moves through the workflow process. The Company plans to eliminate requesting social security numbers as part of the application process. Customers will be asked to provide their account number instead. The system is anticipated to be online in 2023.

## Universal Service Eligibility Criteria

### PCAP

- Total gross household income is at or below 150% of FPIG. Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial to determine program eligibility.
  - The Companies require households reporting zero income to complete a zero-income form. The form is a Commission-approved form that has been modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
- Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits:
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

### WARM

- Total gross household income is at or below 150% FPIG; up to twenty percent of the budget is used for customers with special needs at 151%-200% FPIG.
- The customer must reside at service address and have six months of consecutive electric service.
- The customer must provide proof of home ownership.
- A minimum annual use of 6,500 kWh is required; 0 kWh for homes coordinated with state or gas weatherization.
- Home may receive services again after five years.

### Hardship Fund

- Total gross household income must be at or below 250% FPIG.
- The account is for a residential single home or apartment.
- The name on the account must be an adult resident; a residency exception will be made for ratepayers assigned to active military duty.
- The customer must have paid a minimum of \$150 on their account within the past ninety days (minimum of \$100 if age 62 or over) and the account balance must be at least \$100. Customers age 62 and over may have a \$0 balance, but not a credit balance.

## **CARES**

To qualify, the customer must be payment-troubled and experiencing a recent hardship, such as serious illness or injury to a member of a household, death of a wage earner, marital or family problems, handicapped or disabled person, sudden loss of income to the household, or any customer 60 years of age or over requiring special assistance.

## Universal Service Needs Assessments

### 2021 Needs Assessment - Met-Ed

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

County	Total Households	Households Under 150% Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	39,628	7,323	18.48%	30,629	5,660	
Berks	156,389	38,721	24.76%	130,035	32,197	
Bucks	240,763	29,964	12.45%	5,190	646	
Chester	192,951	27,370	14.18%	1,150	163	
Cumberland	101,176	16,896	16.70%	10,739	1,793	
Dauphin	113,759	27,277	23.98%	5,886	1,411	
Lancaster	204,003	43,224	21.19%	1,986	421	
Lebanon	53,857	12,354	22.94%	53,549	12,284	
Lehigh	140,072	36,308	25.92%	3,749	972	
Monroe	59,950	13,915	23.21%	21,646	5,024	
Montgomery	318,648	41,675	13.08%	11,690	1,529	
Northampton	115,300	22,376	19.41%	60,283	11,701	
Pike	22,717	4,365	19.21%	15,674	3,011	
York	174,425	34,979	20.05%	161,537	32,388	
<b>Total</b>	<b>1,933,638</b>	<b>356,747</b>	<b>18.45%</b>	<b>513,743</b>	<b>109,200</b>	<b>21.256%</b>

2021 Needs Assessment - Penelec

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Armstrong	28,035	7,272	25.94%	99	26	
Bedford	19,930	5,597	28.08%	10,159	2,853	
Blair	51,647	14,755	28.57%	48,867	13,961	
Bradford	25,084	7,186	28.65%	19,753	5,659	
Cambria	56,933	16,547	29.06%	55,048	15,997	
Centre	59,380	18,070	30.43%	4,483	1,364	
Clarion	15,930	5,347	33.57%	4,967	1,667	
Clearfield	31,704	9,616	30.33%	29,890	9,066	
Crawford	35,169	10,586	30.10%	22,361	6,731	
Cumberland	101,176	16,896	16.70%	5,311	887	
Erie	110,388	34,239	31.02%	107,396	33,314	
Forest	2,131	632	29.66%	3,459	1,026	
Franklin	61,617	14,456	23.46%	5,129	1,203	
Huntington	16,779	4,116	24.53%	11,585	2,842	
Indiana	33,855	11,358	33.55%	22,734	7,627	
Jefferson	18,400	5,510	29.95%	14,203	4,254	
Juniata	9,380	2,474	26.38%	726	192	
Lycoming	46,160	12,403	26.87%	727	195	
McKean	17,059	5,598	32.82%	14,128	4,637	
Mifflin	19,075	5,808	30.45%	19,517	5,943	
Perry	18,512	3,850	20.80%	990	206	
Potter	6,630	2,083	31.42%	2,521	792	
Somerset	29,518	7,511	25.45%	26,610	6,772	
Sullivan	2,751	674	24.50%	2,899	710	
Susquehanna	17,027	4,386	25.76%	11,811	3,043	
Tioga	16,442	4,803	29.21%	10,597	3,095	
Venango	22,103	6,399	28.95%	18,657	5,401	
Warren	17,124	4,744	27.70%	14,886	4,123	
Wayne	18,938	4,862	25.67%	3,080	791	
Westmoreland	153,772	31,940	20.77%	1,992	414	
Wyoming	10,887	2,381	21.87%	7,055	1,543	
<b>Total</b>	<b>1,073,536</b>	<b>282,099</b>	<b>26.28%</b>	<b>501,640</b>	<b>146,334</b>	<b>29.171%</b>

**2021 Needs Assessment - Penn Power**

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

<b>County</b>	<b>Total Households</b>	<b>Households Under 150% of Poverty</b>	<b>Percent of Households Under 150% of Poverty</b>	<b>Res. Cust.</b>	<b>Estimated Residential Customers &lt;150% of Poverty</b>	<b>Estimated Res. Cust. &lt;150% of Poverty % to Total</b>
<b>Allegheny</b>	545,695	122,398	22.43%	20,482	4,594	
<b>Beaver</b>	72,086	16,123	22.37%	11,627	2,601	
<b>Butler</b>	77,725	13,883	17.86%	30,766	5,495	
<b>Crawford</b>	35,169	10,586	30.10%	6,358	1,914	
<b>Lawrence</b>	37,300	10,558	28.31%	33,652	9,527	
<b>Mercer</b>	46,821	13,013	27.79%	45,767	12,719	
<b>Venango</b>	22,103	6,399	28.95%	20	6	
<b>Total</b>	<b>836,899</b>	<b>192,960</b>	<b>23.06%</b>	<b>148,672</b>	<b>34,284</b>	<b>23.060%</b>

2021 Needs Assessment - West Penn Power

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	39,628	7,323	18.48%	1,597	295	
Allegheny	545,695	122,398	22.43%	71,498	16,037	
Armstrong	28,035	7,272	25.94%	29,662	7,694	
Bedford	19,930	5,597	28.08%	4,130	1,160	
Blair	51,647	14,755	28.57%	19	5	
Butler	77,725	13,883	17.86%	44,613	7,968	
Cameron	2,334	797	34.15%	3,476	1,187	
Centre	59,380	18,070	30.43%	55,092	16,764	
Clarion	15,930	5,347	33.57%	8,917	2,993	
Clinton	15,058	4,705	31.25%	2,598	812	
Elk	14,215	3,365	23.67%	16,180	3,830	
Fayette	55,346	17,679	31.94%	61,174	19,539	
Franklin	61,617	14,456	23.46%	48,825	11,454	
Fulton	6,040	1,429	23.66%	5,232	1,238	
Greene	14,503	3,898	26.88%	16,113	4,331	
Huntingdon	16,779	4,116	24.53%	53	13	
Indiana	33,855	11,358	33.55%	1,339	449	
Jefferson	18,400	5,510	29.95%	43	13	
Lycoming	46,160	12,403	26.87%	494	133	
McKean	17,059	5,598	32.82%	4,406	1,446	
Potter	6,630	2,083	31.42%	2,556	803	
Somerset	29,518	7,511	25.45%	243	62	
Washington	85,201	17,193	20.18%	94,379	19,046	
Westmoreland	153,772	31,940	20.77%	160,294	33,293	
<b>Total</b>	<b>1,414,457</b>	<b>338,686</b>	<b>23.94%</b>	<b>632,933</b>	<b>150,565</b>	<b>23.788%</b>

### Universal Service Participant and Budget Projections

<b>Met Ed Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	13,258	13,286	13,314	13,342	13,370
Administration	1,000,554	1,002,667	1,004,780	1,006,893	1,009,006
Bill Subsidy	16,414,812	16,449,479	16,484,146	16,518,813	16,553,480
Debt Forgiveness	10,832,941	6,330,784	4,845,072	4,354,788	4,192,994
<b>Total PCAP</b>	<b>28,248,307</b>	<b>23,782,930</b>	<b>22,333,998</b>	<b>21,880,494</b>	<b>21,755,480</b>
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,000	1,000	1,000	1,000	1,000
<b>Total WARM</b>	<b>6,916,000</b>	<b>7,315,640</b>	<b>7,738,952</b>	<b>8,187,350</b>	<b>8,662,333</b>
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	818	818	818	818	818
<b>Total Dollar Energy Fund</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
<b>Total CARES</b>	<b>5500</b>	<b>5,500</b>	<b>5,500</b>	<b>5,500</b>	<b>5,500</b>
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Met-Ed</b>	<b>35,246,807</b>	<b>31,181,070</b>	<b>30,155,450</b>	<b>30,150,344</b>	<b>30,500,313</b>

<b>Penelec Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	18,159	18,494	18,835	19,183	19,537
Administration	1,245,942	1,268,928	1,292,325	1,316,202	1,340,491
Bill Subsidy	18,932,306	19,281,572	19,637,094	19,999,913	20,368,988
Debt Forgiveness	11,780,356	6,728,943	5,061,976	4,511,877	4,330,345
<b>Total PCAP</b>	<b>31,958,604</b>	<b>27,279,443</b>	<b>25,991,394</b>	<b>25,827,992</b>	<b>26,039,824</b>
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,735	1,735	1,735	1,735	1,735
<b>Total WARM</b>	<b>7,890,000</b>	<b>8,345,680</b>	<b>8,828,346</b>	<b>9,339,611</b>	<b>9,881,183</b>
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	550	550	550	550	550
<b>Total Dollar Energy Fund</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>	<b>75,000</b>
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
<b>Total CARES</b>	<b>3,500</b>	<b>3,500</b>	<b>3,500</b>	<b>3,500</b>	<b>3,500</b>
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Penelec</b>	<b>32,040,839</b>	<b>27,361,678</b>	<b>26,073,629</b>	<b>25,910,227</b>	<b>26,122,059</b>

<b>Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	4,254	4,479	4,716	4,965	5,227
Administration	307,137	323,382	340,493	358,471	377,387
Bill Subsidy	4,834,351	5,090,047	5,359,380	5,642,350	5,940,093
Debt Forgiveness	2,678,624	1,463,774	1,062,873	930,576	886,918
Total PCAP	7,820,112	6,877,203	6,762,746	6,931,396	7,204,398
<b>WARM (LIURP)</b>					
Projected WARM Participants	600	600	600	600	600
Total WARM	3,466,000	3,535,760	3,606,635	3,678,768	3,752,343
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
<b>Gatekeeper</b>					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
<b>Total Penn Power</b>	<b>11,323,112</b>	<b>10,449,963</b>	<b>10,406,381</b>	<b>10,647,164</b>	<b>10,993,741</b>

<b>West Penn Power Projected Budgets</b>					
<b>PCAP</b>					
Projected PCAP Participants	15,666	16,369	17,104	17,872	18,674
Administration	1,043,427	1,090,250	1,139,204	1,190,357	1,243,774
Bill Subsidy	16,150,199	16,874,927	17,632,644	18,424,382	19,251,169
Debt Forgiveness	11,781,446	7,121,640	5,583,904	5,076,451	4,908,991
Total PCAP	28,975,072	25,086,817	24,355,753	24,691,189	25,403,934
<b>WARM (LIURP)</b>					
Projected WARM Participants	1000	1000	1000	1000	1000
Total WARM	8,578,000	9,079,560	9,610,951	10,173,958	10,770,473
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total West Penn Power</b>	<b>37,605,072</b>	<b>34,218,377</b>	<b>34,018,704</b>	<b>34,917,147</b>	<b>36,226,407</b>

The PCAP budgets are based on projected PCAP enrollment levels for 2024 through 2028 program years and the estimated average expense per year-end participant. The Companies attempt to consider plan changes and past trends during similar events when estimating expenses or participation. The budgets may be adjusted each year based on actual data to minimize over and under-collections from customers.



## Conclusion

The Companies submit their Universal Service and Energy Conservation Program is consistent with all applicable Commission requirements, including the following:

- 52 Pa. Code § 56.1, *et seq.* (Standards and Billing Practices for Residential Utility Service)
- 66 Pa. C.S. § 1401, *et seq.* (Responsible Utility Customer Protection Act)
- 52 Pa. Code §§ 54.71-54.78 (Reporting Requirements for Universal Service and Energy Conservation Programs)
- 52 Pa. Code §§ 58.1-58.18 (regarding LIURP)
- PCAP Policy Statement of July 25, 1992, Docket No. M-00920345
- 66 Pa. C.S. §§ 2801, *et seq.* (Electricity Generation Customer Choice and Competition Act)
- Commission Universal Service and Energy Conservation Programs Guidelines, Docket No. M-00960890F0010 (Order entered Jul. 10, 1997)
- Commission Universal Service and Energy Conservation Program Reporting Requirements, Docket No. L-00970130 (Order entered Apr. 30, 1998)
- Customer Assistance Programs: Funding Levels and Cost Recovery Mechanisms, Docket No. M-00051923 (Order entered Dec. 18, 2006)
- Cost recovery of USECP costs via the Companies' Universal Service Cost Riders as approved by the Commission's Orders at Docket Nos. R-00061366, R-00061367, R-00072437, and R-2014-2428742
- *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017)

## Company Contacts

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## Attachment A

### Community-Based Organizations (CBO)

- ACTION-Housing Inc. 1-800-841-6899
- Bill Busters Inc. 1-800-475-1251
- Blair County Community Action 1-800-238-9763
- CMC Energy Services 1-877-785-9276
- CLEARresult 1-800-367-7223
- Community Action Committee of the Lehigh Valley 1-866-847-4565
- Community Action Partnership of Mercer County 1-888-508-5216
- Center for Community Action 1-800-323-9997
- Central PA Community Action, Inc. 1-814-765-1551
- C. Driscoll Positive Energy Consulting 1-724-984-4147
- Dollar Energy Fund 1-888-282-6816
- Erie County Housing Authority 1-800-841-6899
- Harron's Home Center 1-877-274-6276
- Healthy Homes 1-724-662-3591
- Hranec Insulation Corporation 1-724-363-0092
- Mincin Insulation 1-412-461-0160
- MT Weatherization 717-525-9665
- Northern Tier Community Action Corporation 1-814-486-1161
- Northwest PA Weatherization 1-814-425-1872
- SEDA-Council of Governments 1-570-524-4491
- Solaire Energy, Inc. 1-800-518-8911
- South Central Community Action Programs 1-800-451-8969
- Tableland Services, Inc. 1-814-445-9628
- TEAZ, Inc. 1-724-366-6753
- True Management, LLC 1-484-866-8011
- Warren Forest Counties Economic Opportunity Council 1-800-231-1797
- Weatherization, Inc. 1-877-984-7462
- York Home Performance 717-586-8584