

May 26, 2023

Pennsylvania Public Utility Commission
Commonwealth Keystone Building 2nd Floor
400 North Street, Harrisburg PA 17120

Submitted via PA Public Utility Commission eFiling (efiling.puc.pa.gov)

RE: PA Public Utility Commission’s call for “2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs” [M-2023-3038944]

PA PUC:

Thank you for the opportunity to comment on utilities’ universal service programs. We are pleased that the Commission is reviewing these policies and agree that customer assistance programs (CAPs) deserve such attention. We recommend specific improvements that will reduce the effort that residents need to participate in a CAP and receive its benefits.

As alluded to in the seventh question in the request for comments, developing quality communication materials is essential for a CAP to serve the public. Thoughtful communication can mitigate customers’ confusion about eligibility, the enrollment process, and program benefits, as well as reduce any customer distrust of such low-income programs.

To develop appropriate communication materials, organizations running CAPs need to consider the customer perspective. Prior to enrollment, customers must determine whether they are eligible for the CAP and, if so, whether it is attractive enough to be worth their effort to apply. For customers to make these determinations, then need information about program eligibility, the application and enrollment processes, program benefits, program costs, and any program risks. They need that information to be readily accessible, in clear, respectful language.

In our recent research paper (open access: <https://doi.org/10.1016/j.enpol.2023.113568>), we offer a simple procedure for developing such communications and testing their usability for consumers. Our paper illustrates its method with examples that redesign three current communications regarding CAPs offered by major electric distribution companies. Our method could easily be followed by other programs (Supplementary Material A: <https://ars.els-cdn.com/content/image/1-s2.0-S0301421523001532-mmc2.pdf>).

Our study found that consumers appreciate the ability to decide quickly whether a program is suitable for them. They would also like information that electric distribution companies can be reluctant to share, such as how much energy (and money) they can expect to save, and whether

programs were open to renters. We show how such information can be conveyed and suggest the guidance that regulators should provide to electric distribution companies. We found that having to wait for improvements was a significant deterrent to enrolling in a CAP. Here, too, regulators could take steps to make CAPs more attractive.

We hope this commentary proves useful. Please reach out if questions emerge.

Sincerely,

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