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July 10, 2023

VIA ELECTRONIC FILING

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

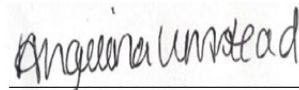
**Re: Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Years 2024 – 2028;
Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535**

Dear Secretary Chiavetta:

Attached for electronic filing, please find the Reply Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, “the Companies”) in the above-referenced proceedings.

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 (jmagee@pa.gov)
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	Docket Nos.	M-2022-3036532
	:		M-2022-3036533
	:		M-2022-3036534
	:		M-2022-3036535

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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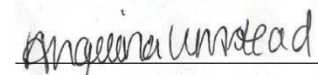
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Dated: July 10, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	Docket Nos.	M-2022-3036532
	:		M-2022-3036533
	:		M-2022-3036534
	:		M-2022-3036535

**REPLY COMMENTS OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY,
AND WEST PENN POWER COMPANY**

I. INTRODUCTION

On November 1, 2022, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“WPP”) (individually referred to as “Company” and collectively referred to as the “Companies”) filed a joint proposed Universal Service and Energy Conservation Plan (“USECP” or “Joint Plan”) for 2024-2028.

On March 16, 2023, the Pennsylvania Public Utility Commission (“Commission”) issued an Order regarding the proposed Joint Plan of the Companies.¹ 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 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, 2023.² Consistent with

¹ *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, Order Directing Supplemental Information and Establishing Comment Period*, Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535 (Order entered on March 16, 2023).

² *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, Approval of the Companies March 27, 2023 Request for Extension of Filing Deadlines*, Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535 (Secretarial Letter issued on April 4, 2023).

the Order, on April 25, 2023, the Companies submitted supplemental information as well as an amended USECP for plan 2024-2028 reflecting the proposed changes explained in their Supplemental Responses.

On May 31, 2023, the Companies filed a correction to the Supplemental Information provided in its Amended Response to Information Request No. 1, correcting an error in the formula used to calculate the Proposed Percentage of Income Payment (“PIPP”) Average Monthly Utility Bills.³ On May 31, 2023, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a letter requesting an extension to file Comments in order to evaluate the corrected information. The Commission issued a Secretarial Letter granting the extension on the Comments until June 20, 2023 and Reply Comments to be filed on July 10, 2023.⁴

Pursuant to the revised submission date provided in the Commission’s June 2, 2023, Secretarial Letter, on June 20, 2023, CAUSE-PA, Office of Consumer Advocate (“OCA”), and the Pennsylvania Coalition of Local Energy Efficiency Contractors (“CLEEC”) each submitted individual Initial Comments in this proceeding. Through these Reply Comments, the Companies will now respond. In addition to the Reply Comments below, the Companies are also attaching a second amended proposed USECP for 2024-2028 to reflect the changes explained in more detail below.

³ *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, Supplemental Information and Amended Proposed USECP Filing*, Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535 (Supplemental Filing on May 31, 2023).

⁴ *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, Approval of CAUSE-PA May 31, 2023 Request for Extension of Filing Deadlines*, Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535 (Secretarial Letter issued on June 2, 2023).

II. REPLY COMMENTS

A. Implementation of Transition from 36-month to 12-month Forgiveness Period

In their Initial Comments, CAUSE-PA indicated that it strongly supported the Companies' proposal to transition from a 36-month arrearage forgiveness cycle to a 12-month forgiveness cycle for the Companies' low-income program, PCAP. However, CAUSE-PA expressed concerns regarding the implementation of the transition and recommends that the Companies target transition during the shoulder months.

While CAUSE-PA would prefer the Companies to target shoulder months for implementation, from a practical standpoint the changes to the program will be implemented as promptly as possible after the USECP has been approved. The first step of implementation will be to remove customers from the Equal Payment Plan ("EPP"). Customers will receive a letter to explain what is transpiring, including an explanation that bills will be temporarily based on actual charges that will fluctuate month to month during this period. The Companies will also notify customers that collections will be held until the new program is implemented and the amount due will be reset at enrollment on the new program.

Additionally, CAUSE-PA recommends providing total forgiveness to participants that have less than 12 forgiveness credits remaining on the current PCAP plan to avoid extending the forgiveness period for participants that are near completing the program. It is not clear if this is recommended for active participants only or if it should address previous participants too. While a customer may have less than 12 forgiveness credits remaining to clear the preprogram arrears, it is likely that customers will have an account balance at conversion that will become part of the new preprogram arrears balance to be forgiven in 1/12th credits. A credit adjustment for the existing preprogram balance would not remedy the full preprogram balance completely.

During the conversion, the Companies could identify the program arrears balance and the existing forgiveness credit amount. If this equates to less than 12 forgiveness credits, the monthly forgiveness credit could be based on the remaining number of credits. It would not be feasible to program this within the system for previous PCAP participants enrolling after the conversion step. After the conversion of all active participants, previous PCAP participants enrolling in the revised PCAP program for the first time would be treated as new participants, and the account balance can be set aside and eligible for 1/12th forgiveness credits.

B. The Companies are Currently Unable to Automatically Enroll PCAP Customers Between Pennsylvania Operating Companies.

Both CAUSE-PA and the OCA expressed concerns in their Initial Comments about customers not being able to automatically enroll in PCAP when they move from one Pennsylvania operating company to another. Currently, when customers have a change of address within an operating company, PCAP follows the customer to the new location automatically in FirstEnergy's SAP systems. The four operating companies are located in two separate SAP systems, with Penn Power in a system separate from Met-Ed, Penelec and West Penn Power. The logic that prevents PCAP moving from company to company automatically can be modified to allow PCAP to follow the customer for Met-Ed, Penelec and West Penn Power. However, the Companies do not currently have a technical solution to allow automatic enrollment to or from Penn Power.⁵

The decision to set aside the balance for forgiveness credits is determined within each operating company. If the customer moves to an operating company where they previously held an account on PCAP, only the remaining preprogram balance for the prior PCAP account may earn forgiveness credits. If the customer was not a previous PCAP customer in the operating

⁵ This point will be more fully addressed in the pending concurrent Pennsylvania Consolidation proceeding, Docket No. A-2023-3038771, and to the extent the consolidation is approved, the Companies will be exploring options to streamline enrollment for PCAP customers moving from one Pennsylvania operating company to another.

company where they now reside, the account balance (if any) can become preprogram arrears. Balances do not transfer between operating companies.

To provide further clarification to customers, a bill print message could be added to the final bill to explain how PCAP participation is impacted with directions on how to continue the PCAP enrollment.

C. Dollar Energy Fund (“DEF”) Currently Offers the Text-to-Recertify Option.

In their Initial Comments, both CAUSE-PA and the OCA offer suggestions and recommendations surrounding the text-to-recertify process. Currently, the Companies’ program administrator is DEF. DEF is a 501c3 organization, a non-profit agency. DEF is utilizing the text feature to offer a benefit to existing customers as opposed to a sales endeavor. Customers are advised on the initial text message that they may opt out of the text-to-recertify process by typing the word “STOP”. If customers block the DEF text, DEF stops texting that customer. If customers make inappropriate responses within the application (*e.g.*, where there are zero people in the household), the customer is given an opportunity to correct the information. If the error continues, a message is given advising that the customer may call DEF to complete the process. If a customer chooses not to continue in the text-to-recertify process, they will receive a message that reminds them of the recertification due date and DEF’s phone number to call. The text-to-recertify call also explains that data rates may apply.

This DEF outreach occurs approximately 60 days prior to the recertification date and at the same time as the Companies’ outreach. As described in the USECP, the Companies make multiple attempts via letters and outbound calls to encourage the customer to complete the recertification. Additionally, the Companies complete outreach to customers that began the process with DEF but have not submitted the necessary documentation to determine eligibility. The Companies complete outbound calls to remind them to submit the documents.

Upon removal, a letter is mailed to the customer providing the following:

- A reminder that the monthly credit and forgiveness credit amounts will no longer be on the bill;
- A reminder that the total account balance will be due;
- Guidance on how to enroll online or by phone, including the hours to call DEF;
- Information about the opportunity to receive the credits missed while removed; and
- A reminder that PCAP participants are exempt from security deposits.

D. The Companies are Working Toward Unity by Proposing a Flat Rate for Forgiveness

In their Initial Comments, CAUSE-PA recommends adjusting the amount to the average preprogram amount per operating company when allowing additional dollars to be set aside for forgiveness. The Companies would prefer to maintain one flat amount that would be consistent across the PCAP program and all operating companies. One flat amount is simpler to communicate and train. When employees or groups (internal or external) work with all the companies, it also helps avoid confusion when addressing complaints, inquiries, etc.

E. Joint Plan Clarifications

CAUSE-PA and the OCA both address concerns regarding certain elements of the Joint Plan including the final PCAP bill, security deposit refunds, and LIHEAP requirements. Based on CAUSE-PA and the OCA's comments, the Companies offer the following clarifications in these areas regarding their proposed Joint Plan.

a. Final PCAP Bill

In their Initial Comments, CAUSE-PA and OCA express concerns with how the final bill will be calculated by the Companies if the USECP is approved. With the proposed percentage of income payment (“PIP”), participants will not be permitted to have the EPP. The true-up associated with the budget anniversary or final bill will no longer be a billing factor.

With the fixed credit plan, customers are required to be on the EPP to maintain a level monthly bill. The budget anniversary may cause an increase in the monthly bill when it occurs, and a PCAP EPP true-up credit is given to offset the charge. At final billing, the budget ends and any true-up balance is reflected on the final statement. The only way to avoid this being included as part of the final bill would be to issue a credit as is done at anniversary on the fixed credit PCAP program, which could increase USECP cost; however, the true-up associated with the budget anniversary or final bill will no longer be a billing factor if the proposed PIP is approved.

The EPP true-up will occur as the Companies prepare accounts for the conversion to the revised PCAP program. The true-up amount, if any, will be part of the payment due; however, customers will not be subject to collection activity and the balance will become part of the preprogram balance when enrolled on the new fixed bill program.

b. Security Deposit Refunds

Based on the concerns addressed in CAUSE-PA and OCA’s Initial Comments surrounding when a security deposit is refunded, the Companies would like to better explain their policy. Security deposits are not charged to customers who receive LIHEAP or are enrolled on PCAP. The account is coded to prevent security deposits for 15 months after the LIHEAP grant or until the customer is no longer on PCAP. Upon receipt of LIHEAP or enrollment on PCAP, any held deposit is released and applied to the account balance in accordance with 66 Pa.C.S. § 1404(c)(3)

and 52 Pa. Code § 56.53(c). Any unpaid deposit or deposit installments billed to the customer's account are removed. Customers may request a refund of any open credit balance on the account.

c. LIHEAP Requirement

As stated in the USECP, the Company does require customers to agree to apply for LIHEAP as part of the enrollment process for PCAP. However, the Companies do not require customers to direct their LIHEAP funds to FirstEnergy as a condition of PCAP enrollment. The Companies do not remove customers from PCAP if FirstEnergy does not receive a LIHEAP benefit on the customer's electric account or if the customer does not apply.

The Department of Human Services ("DHS") announced LIHEAP data sharing with utilities would begin in 2024 and the review of procedures and requirements is ongoing. In their Initial Comments, CAUSE-PA recommends that the Companies allow autoenrollment and auto-recertification once this data sharing is authorized. However, the Companies do not anticipate that automatic enrollment in PCAP with the DHS's LIHEAP data sharing will be feasible from a practical standpoint. Customers enrolling in PCAP would not receive an overview of the program information from the LIHEAP application. It may cause customers frustration or hardship to enroll them without their understanding. If customers are not clear that they are going to be enrolled in a program and understand how that program works, it could cause customer confusion and distrust for both the utility and DHS.

Additionally, customers re-enrolling may have account balances to take into consideration. Depending on each customer's account balance, automatic enrollment could result in a large payment due on the first PCAP bill. For example, if a customer is on an installment plan when completing a re-enrollment, the installment plan is removed and the balance, excluding any remaining preprogram arrears, becomes due on the first PCAP bill. The customer is obligated to

pay any charges that exceed the remaining preprogram arrears amount. Customers need to understand the amount due and decide if re-enrollment is the best option.

Despite the concerns outlined above, the Companies recognize that using the household and income data from LIHEAP could be an effective way to complete an automatic recertification for an active PCAP participant. Customers recertifying are already familiar with the program and there are no balance changes when recertifying. Customers can be notified by mail that this was completed using LIHEAP data.

The application process could be greatly streamlined with LIHEAP's household and income data. The Companies would consider allowing customers to enroll or re-enroll without the need to submit income documentation with the application. This would provide an easier application process for those customers as application eligibility can be determined in one interaction, and it encourages continued LIHEAP participation.

F. OCA's Suggested Ongoing Monitoring is Overly Burdensome

The OCA recommends that the Companies be required to conduct additional monitoring and reporting of the outcomes of the Joint Plan. Not only is OCA's proposed monitoring overly burdensome from a time and resource standpoint, but the Commission also already has well-established reporting requirements for utilities to submit standardized information to evaluate the performance of the universal service programs. These reporting requirements are governed in Title 52 of the Pennsylvania Code by the following Commission regulations:

- § 54.75. Annual residential collection and universal service and energy conservation program reporting requirements;
- § 54.76. Evaluation reporting requirements;
- § 54.74. Universal service and energy conservation plans; and
- § 58.15. Program evaluation.

Further, the Commission prepares an annual Universal Service Program and Collections Performance report which includes data and performance metrics for the seven major Pennsylvania electric distribution companies (“EDCs”) and the six major natural gas distribution companies.

Rather than systematically targeting each utility through the USECP filings to establish new and different reporting requirements and schedules for each utility, the Companies would support the creation of a working group. A working group could evaluate the reporting needs to effectively monitor the programs and provide uniform program information that is necessary to support the filing processes as they are associated with the universal service programs. Utilities receive numerous data requests as part of the filing process. With standardized requirements, data could be readily available for all stakeholders.

Finally, the Companies also share various program information during Universal Service Advisory Committee meetings, required reporting and data requests and discovery associated with their various Commission filings.

G. The Customer Outreach Currently Detailed in the Joint Plan is Expansive

In its Initial Comments, CAUSE-PA recommends that the Companies include additional components to their outreach plan, including quarterly training and education for call center staff, DEF and community-based organizations; a data collection component to track metrics of outreach events; and incorporate details surrounding accommodations for special populations. The Companies outlined an extensive Consumer Education, Outreach and Referral Plan (“CEORP”) in the USECP, which is listed below, and are committed to promoting the assistance programs to its customers. The Companies support outreach events when invited by community leaders or agencies but do not organize outreach events across the state. Because there are many layers to outreach due to multiple attempts or channels to reach a customer at any point in time, establishing accurate performance metrics for the success of any one outreach is not possible.

Pursuant to the CEORP, customers receive the following information and communications.

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; and
- Outbound calls are also completed as part of the recertification process.

As a PCAP applicant, customers receive the following outreach:

- Email notifications from DEF'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; and
- Mailed copy of the PCAP agreement when application is submitted.

Outreach to promote energy assistance program enrollment to customers at 0-50% of the Federal Poverty Income Guidelines ("FPIG") and higher is completed as follows:

- Complete outbound call campaigns in the 1st and 4th quarter to promote LIHEAP CASH and CRISIS;
- Participate in the CRISIS Utility File Transfer ("UFT") program;
- Participate in the Turn On program, when open;

- Complete outbound call campaigns to promote PCAP enrollment;
- Send email campaigns to promote PCAP enrollment;
- Send bill inserts to promote all assistance programs;
- Mail letters to LIHEAP recipients not currently participating in PCAP;
- Provide news releases to promote all assistance programs twice per year;
- Post monthly social media messages to promote an active program or assistance in general;
- Purchase radio advertisements to promote LIHEAP or PCAP;
- Provide information on corporate website for assistance programs along with an interactive tool to help determine income eligibility;
- Provide 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;
- Distribute door hangers for field collections;
- Provide referral information on letters related to credit denial, security deposits, termination, etc.; and
- Provide referral information to customers during inbound contacts.

The Companies have the following resources available to Spanish-speaking customers:

- PCAP agreement is available in Spanish;
- Program letters include Spanish verbiage;
- PCAP brochures for distribution, live events, or online reference are available in Spanish;
- PA LIHEAP bill insert includes Spanish verbiage;

- DEF is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers; and
- The Companies have interpreting services available for inbound inquiries.

H. WARM Joint Plan Clarifications and Revisions

WARM is the Companies' low-income usage and reduction program ("LIURP"). In their Initial Comments, CAUSE-PA, OCA, and CLEEC seek clarification on a number of areas regarding the WARM program. The Companies would like to address these comments and concerns as follows below. Additionally, the Companies have also revised the Joint Plan to reflect the changes further described in the sections below. A second amended proposed USECP for 2024-2028 is attached hereto as **Attachment "A"**.

a. LIURP Budget Revisions

Based on the concerns shared in the Initial Comments of CAUSE-PA, OCA, and CLEEC, the Companies agree to increase the job goals and associated budgets for Met-Ed and West Penn Power territory. See the proposed chart below. These changes are also reflected in **Attachment "A"**.

**2024-2028 FirstEnergy USECP
LIURP Budgets and Participation Goals**

Met-Ed		
Year	Budget	Participant Goals
2024	\$ 10,408,580	1,505
2025	\$ 11,010,038	1,505
2026	\$ 11,647,123	1,505
2027	\$ 12,321,963	1,505
2028	\$ 13,036,810	1,505

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	\$ 11,151,400	1,300
2025	\$ 11,803,428	1,300
2026	\$ 12,494,237	1,300
2027	\$ 13,226,146	1,300
2028	\$ 14,001,614	1,300

b. WARM Measures

While not stated specifically in the USECP plan, ductless heat pumps are a measure that the WARM program installs. While the list identified in the USECP filing is not an all-inclusive list of measures the program installs, the Companies agree to add this measure to the list of measures in the USECP. See **Attachment “A”**.

c. WARM Participation

OCA requested confirmation that the Companies have the resources to deliver services to every WARM participant that seeks out weatherization services. The Companies do not have resources available to schedule services for customers immediately in all counties.

When a customer applies for PCAP, that customer is screened for weatherization services. Depending on the customer's annual usage, the customer may be served by FirstEnergy's WARM Plus ("Act 129") program or WARM ("LIURP"). The WARM program will serve customers with annual usage over 6,500 kilowatt hours ("kWh"); however, WARM Plus will also serve customers up to 10,000 kWh annually. The programs work together to manage applications and ensure customers are served. However, we have not turned away any eligible customer willing to participate in the programs.

The requirement for a customer to participate in the WARM program if they are a PCAP recipient supports a much higher participation rate. Too often, customers are not responding when contractors reach out to schedule appointments. A much greater response rate is seen when the customer knows they are required to participate. Contractors are required to make two phone calls and send two letters to a customer, waiting one week in between each attempt. If the customer does not respond, the job is cancelled. As stated above, both the WARM and WARM Plus programs serve customers depending on usage parameters.

CAUSE-PA shared the Commission's concerns regarding potential PCAP removal for "unreasonable" consumption after WARM measures were installed, commenting that the Companies already have authority to remove a customer based on illegal or fraudulent activity. The Companies agree to eliminate removal from PCAP as a penalty for households experiencing an increase in usage. See **Attachment "A"**.

The Companies do not have insight as to the square footage of a customer's home until the customer is served. Customers are rarely able to provide square footage of their home. However, the Companies agree to lowering the usage threshold to 6,000 kWh to capture more eligible households. See **Attachment "A"**.

Regarding data sharing policy concerns shared by CAUSE-PA, the Companies agree that the customer consent language should be updated and agree to work with our USAC to revise.

The Companies responded to the Commission's order (*Supplemental Information* at p. 16) with an explanation for exceptions to re-weatherization stating that a customer's home is eligible for re-weatherization after five years if the customer at the premises has annual usage greater than 6,500 kWh. The Companies clarified that exceptions to re-weatherize a home before the five-year limit would be made if full cost measures were not completed at the property previously, or if a health and safety issue was corrected by the customer. The Companies agree to add this language into the 2024 USECP plan as requested by CAUSE-PA. See **Attachment "A"**.

d. Landlord Agreements

The Companies would like to clarify that customers that are renters and do not return a landlord agreement form are eligible to be served by WARM but will only receive baseload measures. Full measures can only be provided if signed landlord agreement form is received.

OCA commented that the Companies should implement additional options to facilitate customers abilities to obtain landlord approval, such as approval by text or email and accepting signatures. The Companies have not explored digital options to obtain landlord approval but will consider options in the future as we build out our digital communications capabilities.

e. Health and Safety Budget

To further clarify how the health and safety budget is used. It is the contractor's job to identify health and safety issues and barriers that prevent the installation of weatherization measures. Incidental repairs fall within this budget. The contractor determines whether resolution can be obtained utilizing the job's health and safety budget. If a resolution can be obtained within the available budget, the contractor may proceed. Because these situations can vary significantly, the program allows flexibility, with the main parameter being the available budget.

I. Hardship Fund Clarifications

As a point of clarification, the amount shown as the *dollar amount of contributions* is incorrect in Table 6 of the Initial Comments of CAUSE-PA. The amount shown is the administrative budget for the hardship fund and not shareholder contributions used to match customer contributions. The Companies match customer contributions up to the following maximum shareholder contributions:

Met Ed	\$117,000
Penelec	\$73,000
Penn Power	\$36,000
West Penn Power	\$109,000

When applying for a DEF grant, customers are required to make a sincere effort payment, which is \$150 if less than 62 years of age, or \$100 if 62 or older. DEF strives to be good stewards of their donors’ funds. The hardship program is about giving customers a hand up when needed, and the sincere effort payment requirement is a positive attribute for donors’ wanting to help those that are making the effort but struggling. The Companies recognize the current requirement may be in excess of three PCAP bill amounts and are willing to work with DEF to establish a sincere effort payment that requires \$150 (or \$100 if 62 or older), but not to exceed three PCAP bill amounts.

J. Gatekeeper Program Clarifications

Gatekeeper referrals are from field staff when completing collection activities. The Gatekeeper referral has halted the actual disconnection of service to allow referrals to local authorities or assistance agencies to occur.

The Gatekeeper staff are the analysts on the Human Services team. This is the same staff that handles the CARES referrals and supports the PCAP program. The CARES program provides assistance on a short-term basis to payment-troubled residential customers. The staff has not received specialized training related to low-income and vulnerable populations. These employees have access to interpreter services as needed.

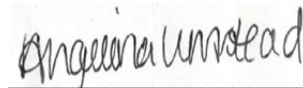
III. CONCLUSION

The Companies appreciate being given this opportunity to address the initial comments submitted in this proceeding regarding their Joint Plan. For the reasons stated herein, the Companies respectfully request that the Commission: (1) accept these Reply Comments (2) consider and adopt the positions therein, which support approval of the Companies' Second Amended Joint Plan; and (3) approve the Companies' Second Amended Joint Plan.

Date: July 10, 2023,

Respectfully Submitted,

By:



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Pennsylvania Electric Company
Pennsylvania Power Company
West Penn Power Company



**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 Programs¹ 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.² 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

¹ 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."

² 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:³

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

³ 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.⁴

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

⁴ 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.

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

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

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

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

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.⁵

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

⁵ 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 income⁶ 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:

⁶ 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

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
Online: 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.⁷

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

⁷ *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."

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 Plan⁸, 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 1st and 4th 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

⁸ *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.⁹

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

⁹ 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 6,000 kWh or more annually will qualify. If customers participate in PCAP and have annual electric usage of 6,000 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. The Companies will consider waiving the 5-year stay-out requirement if full cost measures were not previously installed at the property or if a health and safety issue has been resolved that needed addressed before measures could be installed.

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
- Ductless heat pumps
- 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.¹⁰

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 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.

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

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. The Companies waive the annual usage requirement on coordinated jobs. 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
Total Residential Customers (December 2021)	513,743	501,640	143,672	632,933
Number of Customers with Incomes at or Below 150% of FPIG	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
Total Potential Participants	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
Estimated Renters	74,243	43,577	9,467	57,316
Number of Customers with Incomes 151-200% of FPIG	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
Total Potential Participants	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
Estimated Renters	25,421	13,560	3,844	19,579

Funding and Enrollment Goals¹¹

Met-Ed		
Year	Budget	Participant Goals
2024	\$ 10,408,580	1,505
2025	\$ 11,010,038	1,505
2026	\$ 11,647,123	1,505
2027	\$ 12,321,963	1,505
2028	\$ 13,036,810	1,505

¹¹ 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).

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	\$11,151,400	1,300
2025	\$11,803,428	1,300
2026	\$12,494,237	1,300
2027	\$13,226,146	1,300
2028	\$14,001,614	1,300

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.
3. The minimum annual usage requirement for WARM participation will be changed from 6,500 kWh to 6,000 kWh.

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 6,000 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	
Total	1,933,638	356,747	18.45%	513,743	109,200	21.256%

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	
Total	1,073,536	282,099	26.28%	501,640	146,334	29.171%

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	
Total	836,899	192,960	23.06%	148,672	34,284	23.060%

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	
Total	1,414,457	338,686	23.94%	632,933	150,565	23.788%

Universal Service Participant and Budget Projections

Met Ed Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
Projected WARM Participants	1,505	1,505	1,505	1,505	1,505
Total WARM	10,408,580	11,010,038	11,647,123	12,321,963	13,036,810
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	5,500	5,500	5,500	5,500	5,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Met-Ed	38,739,387	34,875,468	34,063,621	34,284,957	34,874,790
Penelec Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Penelec	32,040,839	27,361,678	26,073,629	25,910,227	26,122,059

Penn Power Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
Gatekeeper					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
Total Penn Power	11,323,112	10,449,963	10,406,381	10,647,164	10,993,741

West Penn Power Projected Budgets					
PCAP					
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
WARM (LIURP)					
Projected WARM Participants	1300	1300	1300	1300	1300
Total WARM	11,151,400	11,803,428	12,494,237	13,226,146	14,001,614
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total West Penn Power	40,178,472	36,942,245	36,901,990	37,969,335	39,457,548

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:

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Human Services Department
P. O. Box 16001
Reading, Pennsylvania 19612-6001
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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 Larnerd, 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 Programs¹ 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.² 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

¹ 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."

² 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:³

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

³ 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.⁴

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

⁴ 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.

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

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

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

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

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.⁵

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

⁵ 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 income⁶ 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:

⁶ 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

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
Online: 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.⁷

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

⁷ *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 Plan⁸, 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 1st and 4th 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

⁸ *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.⁹

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

⁹ 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. The Companies will consider waiving the 5-year stay-out requirement if full cost measures were not previously installed at the property or if a health and safety issue has been resolved that needed addressed before measures could be installed.

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
- Ductless heat pumps
- 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.¹⁰

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:

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

- Facilitates workload management through the use of work queues
- Promotes effective communication and documentation through an enhanced user 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. The Companies waive the annual usage requirement on coordinated jobs. 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
Total Residential Customers (December 2021)	513,743	501,640	143,672	632,933
Number of Customers with Incomes at or Below 150% of FPIG	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
Total Potential Participants	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
Estimated Renters	74,243	43,577	9,467	57,316
Number of Customers with Incomes 151-200% of FPIG	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
Total Potential Participants	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
Estimated Renters	25,421	13,560	3,844	19,579

Funding and Enrollment Goals¹¹

¹¹ 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		
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

Met-Ed		
Year	Budget	Participant Goals
2024	\$ 10,408,580	1,505
2025	\$ 11,010,038	1,505
2026	\$ 11,647,123	1,505
2027	\$ 12,321,963	1,505
2028	\$ 13,036,810	1,505

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

West Penn Power		
Year	Budget	Participant Goals
2024	\$11,151,400	1,300
2025	\$11,803,428	1,300
2026	\$12,494,237	1,300
2027	\$13,226,146	1,300
2028	\$14,001,614	1,300

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.
- 2-3. The minimum annual usage requirement for WARM participation will be changed from 6,500 kWh to 6,000 kWh.

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	
Total	1,933,638	356,747	18.45%	513,743	109,200	21.256%

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	
Total	1,073,536	282,099	26.28%	501,640	146,334	29.171%

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	
Total	836,899	192,960	23.06%	148,672	34,284	23.060%

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	
Total	1,414,457	338,686	23.94%	632,933	150,565	23.788%

Universal Service Participant and Budget Projections

Met Ed Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	5500	5,500	5,500	5,500	5,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Met-Ed	35,246,807	31,181,070	30,155,450	30,150,344	30,500,313

Penelec Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Penelec	32,040,839	27,361,678	26,073,629	25,910,227	26,122,059

Penn Power Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
Gatekeeper					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
Total Penn Power	11,323,112	10,449,963	10,406,381	10,647,164	10,993,741

West Penn Power Projected Budgets					
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total West Penn Power	37,605,072	34,218,377	34,018,704	34,917,147	36,226,407

Met Ed Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
Projected WARM Participants	1,505	1,505	1,505	1,505	1,505
Total WARM	10,408,580	11,010,038	11,647,123	12,321,963	13,036,810
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	5,500	5,500	5,500	5,500	5,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Met-Ed	38,739,387	34,875,468	34,063,621	34,284,957	34,874,790
Penelec Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total Penelec	32,040,839	27,361,678	26,073,629	25,910,227	26,122,059

Penn Power Projected Budgets	2024	2025	2026	2027	2028
PCAP					
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
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Total PCAP	7,820,112	6,877,203	6,762,746	6,931,396	7,204,398
WARM (LIURP)					
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
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
Gatekeeper					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
Total Penn Power	11,323,112	10,449,963	10,406,381	10,647,164	10,993,741

West Penn Power Projected Budgets					
PCAP					
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
WARM (LIURP)					
Projected WARM Participants	1300	1300	1300	1300	1300
Total WARM	11,151,400	11,803,428	12,494,237	13,226,146	14,001,614
Dollar Energy Fund Administration					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
CARES					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
Gatekeeper					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
Total West Penn Power	40,178,472	36,942,245	36,901,990	37,969,335	39,457,548

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