PAPUC

UNIVERSAL SERVICE WORKING GROUP REPORT

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Executive Summary

Background

On March 27, 2023 the Pennsylvania Public Utility Commission (PUC) issued a Secretarial Letter (March 27 Secretarial Letter) seeking input from interested stakeholders regarding how the PUC's universal service regulations, policies and procedures could be revised with a particular focus on 1) increasing program coordination among all public utilities, 2) streamlining the eligibility and enrollment process, and 3) reducing the number of otherwise eligible consumers from losing low-income benefits due to the verification or re-enrollment process. March 27 Secretarial Letter at 1.[1] The PUC articulated 14 questions on which comment was sought and noted that a review of these comments may help inform the PUC's consideration of improvements to the existing programs, including improvements that may be considered in the context of a future rulemaking proceeding.

The following organizations filed comments to the March 27 Secretarial Letter:

- Agway Energy Services, LLC (Agway)
- Aqua Pennsylvania Inc. (Aqua)
- Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA); Pittsburgh United; and the Tenant Union Representative Network (TURN), (collectively the Utility Justice Advocates)
- Community Legal Services of Philadelphia (CLS); Pennsylvania Utility Law Project (PULP); 9 State Representatives; one Philadelphia City Council member;

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[1] The March 27 Secretarial Letter was published at 53 Pa.B. 2022 (4/8/2023).
https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol53/53-14/478.html

and 56 other organizations, agencies, and associations, (collectively Advocates Letter)

- Columbia Gas of Pennsylvania, Inc. (Columbia)

- Duquesne Light Company (Duquesne)

- Energy Association of Pennsylvania (EAP)[2]

- Hanzelle Kleeman, Baruch Fischhoff, and Daniel Erian Armanios (Kleeman, *et al.*)

- Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power), and West Penn Power Company (West Penn), (collectively FirstEnergy)

- National Association of Water Companies (NAWC)[3]

- National Fuel Gas Distribution Corporation (NFG)

- PA Office of Consumer Advocate (OCA)

- Office of James F. Kenney, Mayor of Philadelphia (City of Philadelphia)

- Opower, a division of Oracle (Opower)

- PA PUC Consumer Advisory Council (CAC)

- PECO Energy Company (PECO)

- Pennsylvania Telephone Association (PTA)

- Peoples Natural Gas Company (Peoples)

- Philadelphia Gas Works (PGW)

- Pittsburgh Water and Sewer Authority (PWSA)

- PPL Electric Utilities Corporation (PPL)

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[2] Electric public utility EAP members are: Citizens' Electric Company; Duquesne; FirstEnergy; PECO; Pike County Light & Power Company; PPL; UGI Utilities, Inc.-Electric Division; Wellsboro Electric Company; and West Penn Power Company. Natural gas public utility EAP members are: Columbia; Leatherstocking Gas Company, LLC; Pike County Light & Power Company; NFG.; PECO; Peoples; PGW; UGI Utilities Inc.- Gas Division; and Valley Energy Inc. EAP Comments at 1, FN #1.

[3] The public utility members of NAWC are: Aqua; Columbia Water Company; Newtown Artesian Water Company; Pennsylvania-American Water Company; The York Water Company; and Veolia Water Pennsylvania, Inc. In addition to water operations, several NAWC members operate PUC-regulated wastewater systems. NAWC Comments at 1, FN #1.

- Verizon Pennsylvania LLC and Verizon North LLC, (collectively Verizon)

On August 22, 2023, the PUC issued a Secretarial Letter (August 22 Secretarial Letter) establishing a universal service working group (USWG) to address issues discussed or raised in the comments, including:

1. Developing a common application that could be used by all jurisdictional fixed public utilities statewide to facilitate the enrollment of eligible customers into their utilities' universal service programs.
2. Discussing the potential development of a website dedicated to facilitating the enrollment of customers into utilities' universal service programs using, among other tools, a common application form.
3. Discussing the requirements of a statewide administrator, or some other agency, bureau or entity, to administer universal service enrollment statewide.
4. Preparing for the Low Income Household Energy Assistance Program (LIHEAP) Data Sharing process anticipated on or about the summer of 2024.[4]

August 22 Secretarial Letter at 1.

The August 22 Secretarial Letter directed the USWG to file a comprehensive report addressing the above topics by March 21, 2024. August 22 Secretarial Letter at 2. The first meeting of the USWG was held on September 21, 2023. At that meeting, PUC staff established four subgroups to address each of the topics specified above: Common Application Subgroup, Universal Service Website Subgroup, Statewide Customer Assistance Program (CAP) Administration Subgroup, and the LIHEAP Data Sharing Subgroup. Each subgroup met several times from October 2023 through January 2024.

The major recommendations of each subgroup are summarized below.

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[4] This LIHEAP data sharing process is anticipated to roll out in Fall 2024, with the start of the next LIHEAP season.

Recommendations from the Common Application Subgroup:

Proposed Common Application Form (CAF)

The Common Application Subgroup recommends that a universal service common application form should request the following information:

- Service shut off (y/n), Shut off notice (y/n)
- Name of Applicant
- Service Address
- Mailing Address (if different)
- Primary and Secondary (Cell) telephone numbers
- Email Address
- [checkbox] Permission to receive email and text messages (Msg/data rates apply)
- (optional) Do you rent your home? (y/n)
- Total number of occupants: adults and children
- Name, date of birth, and income amount/source(s) for each household member
- Names of utility companies and consent to share application information
- Signature
- Zero-Income Form, if needed

The Common Application Subgroup also recommend the CAF include "taglines" in different languages to instruct customers with limited-English proficiency who they can contact for assistance.

Supplemental information/instructions for customers

The Common Application Subgroup recommends that the CAF should provide information that helps to explain why and how a customer should complete the application process. This information should include:

- Brief description of utility programs.
- Program eligibility requirements.
- Instructions on how to complete the application.
- Required documentation.
- Who to contact for help.

Actions/decisions needed from the PUC

Finally, the Common Application Subgroup identified areas where PUC clarification or action may be needed in order to further implement a statewide CAF, including:

- Establishing whether CAPs will be administered by a statewide agency/organization or individual public utilities.
- Standardizing eligibility verification policies and requirements.
- Establishing how customer information should be securely shared with public utilities.
- Allowing necessary modifications to public utility universal service energy conservation plans (USECPs) to adopt the CAF.

Recommendations from the Universal Service Website Subgroup:

Potential Universal Service Website

The following are areas of general consensus and agreement regarding a potential universal service website:

- Goals of the website are streamlined customer enrollment, efficiencies for public utilities, and protection of data.
- The website would serve as a centralized and secure enrollment portal for accepting universal service applications.
- The website should be a one-stop shop for customers where they can apply for all programs offered by their public utilities and submit documentation proving eligibility.
- The website should be an enrollment portal, not a referral site.
- A Statewide CAP Administrator is not necessary to have a website with a common application, so the question of whether CAPs are administered by a statewide administrator does not need to be settled before implementing a website.
- The website should incorporate the CAF.
- The website should include a data repository where data can be accessed by public utilities.
- The website should be administered by the PUC and funded through its budget process and assessments on public utilities.
- The website should allow customers the option to create an account.
- The website should allow customers to come back and complete their applications later.
- The Department of Insurance educational site and Pennie enrollment site could serve as models.

- Pop-up messages on the website could explain the application submittal and approval process and also include a notice that customers who have received a termination notice should contact their public utility.
- Educational material should be included on the website.
- The website should be uncluttered and achieve a balance between enrollment and education.
- The website should be optimized for mobile viewing.
- The website should offer language and disability accessibility.
- The website should be branded as an official PUC site and hosted on a secure PUC web domain for public awareness due to copycat sites.
- A cybersecurity expert should be consulted on the website's enrollment and data storage processes.

Actions/Decisions Needed from the PUC

If the PUC adopts the recommendations of the Website Subgroup and decides to move forward with establishing a website to facilitate the enrollment of customers into public utilities' universal service programs, using the CAF among other tools, the following administrative steps will need to be addressed:

- Establishing a budget to create and maintain the website, assessed and recovered from public utility customers.
- Address cybersecurity and data storage issues.
- Consider staffing to maintain and support the website.

Recommendations from the Statewide CAP Administrator Subgroup:

Statewide CAP Administration

The Statewide CAP Administrator (SCA) Subgroup did not reach consensus on whether the PUC should transition to statewide CAP administration. However, if the PUC chooses to transition to statewide CAP administration, the SCA Subgroup recommends it be based on the following model:[5]

- An independent bureau of the PUC would serve as the administrator with dedicated staff to administer and manage the Centralized Enrollment System (CES).
- The administrator would accept and process applications and determine an applicant's income eligibility for CAP.
- Public utilities would be responsible to review customer accounts for potential enrollment into their respective CAP programs after receiving income verification from the administrator that the customer meets qualifications.
- The administrator would be responsible for accepting and processing customer income recertification submissions for CAP.
- Public utilities would be responsible for enrolling or recertifying customers in their respective CAP programs after receiving verified income levels from the administrator for customers who continue to meet income qualifications.
- Public utilities would maintain individual USECPs and CAP designs with oversight provided by the PUC.

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[5] *See* Appendix A of the Statewide CAP Administration Subgroup Report for a more comprehensive description of this model (*i.e.*, Model 3).

- A Memorandum of Understanding (MOU) between the Statewide Administrator and the public utilities should be established to permit the public utilities access to the CES.
- Public utilities would retain the ability to enroll customers directly in CAP and provide customers with referrals, education, and outreach.

Actions/Decisions Needed from the PUC

The SCA Subgroup also identified areas for the PUC to address before implementing statewide CAP administration, including:

- A common application and statewide website.
- A streamlined application process and two-way data portal.
- A process for customers to appeal adverse decisions on income eligibility.
- Processing parameters, including timelines for determining income eligibility, how public utilities will be notified of processed applications, and the timeline for enrollment.
- A process for the administrator to ensure customers who verify as low-income are identified as confirmed low-income customers by their public utilities.
- Whether a statewide CAP administration should include CAP or CAP-like programs offered by smaller electric distribution companies (EDCs) and natural gas distribution companies (NGDCs) and water/wastewater utilities.
- Whether costs related to a statewide CAP administrator should be considered administrative funding rather than program funding and whether the CAP funding mechanism would need to change.
- CAP benefit costs charged to public utility ratepayers need to be taken into consideration if the goal is to increase CAP participation dramatically.

Recommendations from the LIHEAP Data Sharing Subgroup:

The Data Sharing Subgroup reached broad consensus that further PUC guidance would be helpful to prepare public utilities for the effective use of LIHEAP participant data. The Data Sharing Subgroup also broadly agreed that a public utility participating in the data sharing program should *only* utilize LIHEAP enrollment data for outreach, simplified/streamlined enrollment, and auto-recertification.

The Data Sharing Subgroup developed proposed educational material and a general policy framework for a public utility's use of LIHEAP data. Within the proposed policy framework, there are areas of consensus and areas of non-consensus as set forth in further detail in the DHS Data Sharing Subgroup Report below. However, the Data Sharing Subgroup members agree that the PUC should provide guidance on the following topics delineated in the policy framework:

Educating customers regarding the LIHEAP application checkbox

- PUC development of educational material, in collaboration with DHS, where possible, to inform consumers about the purpose and effect of the data sharing checkbox, for use by public utilities, universal service program administrators, and other stakeholders.
- Inclusion of the educational material in bill inserts, on-bill messaging, and communications with CAP/County Assistance Office (CAO) administrators/community-based organizations (CBO), as well as on the CAF and public utility/PUC/stakeholder websites.

Public utility participation in DHS LIHEAP data sharing process

- For a public utility participating in LIHEAP data sharing, the filing of a letter with the PUC at the public utility's currently approved USECP docket and any pending USECP docket(s). The letter would indicate that the public utility has signed the DHS data sharing agreement and identify how the public utility plans to use the data.

Individualized outreach and simplified/streamlined enrollment

- For a public utility participating in the LIHEAP data sharing program, performance of targeted outreach to LIHEAP recipients that are not actively enrolled in CAP.
- Development of PUC templates, in English and Spanish, for public utilities to use for this purpose.
- Follow-up communication by participating public utilities informing newly enrolled CAP participants that the household has been enrolled in CAP based on LIHEAP data and requesting that the participant contact the public utility if income has changed since receipt of the LIHEAP grant.
- Discussion between a public utility and their respective universal service advisory committee or group (USAC or USAG) regarding plans for targeted outreach and enrollment and the sharing of draft communications with those stakeholder groups.

CAP Auto-Recertification

- The sufficiency of LIHEAP income and household data received from DHS in the prior 12 months and/or current or prior LIHEAP program year to meet the PUC's

triennial recertification requirement for LIHEAP participants under 52 Pa. Code § 69.265(8)(viii) (relating to CAP design elements) without further paperwork.

- For a public utility participating in the data sharing program, cross-referencing with LIHEAP data for the prior 12 months or the prior LIHEAP program year and recertifying identified households with no additional action needed on the part of the customer.

- Communication by participating public utilities to the auto-recertified customer with an updated CAP amount (if applicable) and directions to contact the public utility to provide additional updates if household income or residents in the household have changed since completing the LIHEAP application.

CAP Auto-Enrollment

- For a public utility participating in the LIHEAP data sharing program, the filing of a letter at its currently approved USECP docket and any pending USECP docket(s) indicating that it has a signed data sharing agreement and whether the data will be used for auto-enrollment for new and returning CAP customers consistent with PUC-established guidelines. If the public utility indicates that the data will be used for auto-enrollment, the letter should also indicate how the public utility intends to use the data.

- For a public utility proposing to begin auto-enrollment, the filing of a petition that includes amended budget projections, identifies proposed process for auto-enrollment, identifies whether amendments to the public utility's current USECP are necessary to facilitate auto-enrollment, and identifies whether the public utility vetted the process with its USAC/USAG and the position of potential parties, if known. If the public utility makes a proposal in conjunction with a new periodic USECP, the same information would be required.

- Prohibition of suppliers charging an early termination or cancellation fee for customers seeking enrollment in CAP and the inclusion of information in the public utility's opt-out notice that customers will be returned to default service if they do not "opt out" of auto-enrollment in CAP.

Other Universal Service Programs

- The sufficiency of LIHEAP income and household data received from DHS in the prior 12 months and/or the current or prior LIHEAP program year to verify eligibility for a public utility's LIURP and/or Hardship Fund without further paperwork.
- Discussion of the public utilities' plans with their respective USAC/USAG and sharing draft communications with those groups.
- A public utility filing a letter at its currently approved USECP docket and any pending USECP docket(s) indicating that it has signed the data sharing agreement and, if so, whether the data will be used for enrollment in the public utility's LIURP and Hardship Fund. If the public utility indicates that the data will be used for enrollment in its LIURP and Hardship Fund, the letter should also indicate how the public utility intends to use the data.
- Parameters for when, how, and under what circumstances a public utility may use the LIHEAP data.

Common Application Subgroup Report

Background

In the March 27 Secretarial Letter, the PUC asked stakeholders to comment on (1) whether public utilities should be required to develop and use standardized CAP forms and CAP procedures; and (2) what barriers exist, if any, to establishing a common application. March 27 Secretarial Letter at 3, Question #10.

Most commenters to the March 27 Secretarial Letter supported at least some standardization of CAP forms and procedures. There was also interest from many commenters in establishing a CAF.

Commenters who supported standardizing CAP forms and procedures noted numerous benefits and efficiencies that could be gained, including:

- Allowing low-income customers to apply and recertify for multiple public utility programs (*e.g.*, electric, natural gas, and water/wastewater) at the same time without duplication of efforts.
- Permitting an outside provider to perform intake and then share the customer's information, with the customer's permission, to other public utilities that deliver services to the customer.
- Making the common application and other forms available in multiple languages to provide greater access.
- Simplifying CAP outreach and education, strengthening the referral processes, and improving access to assistance.

CAC Comments at 2-4, OCA Comments at 26, Advocates Letter at 2, and PWSA Comments at 4.

The Utility Justice Advocates recommended basing a statewide common application form on the application being developed for use in the Pittsburgh region through a collaborative effort conducted by advocates and electric, natural gas, and water public utilities (Proposed Pittsburgh CAF). The Utility Justice Advocates noted the questions in the Proposed Pittsburgh CAF form align with the data that DHS has confirmed it will share with public utilities as part of the LIHEAP data sharing process. Utility Justice Advocates Comments at 46-47.

FirstEnergy supported standardizing the CAP application process with a uniform application and methodology for calculating income that is administered by one statewide entity. FirstEnergy asserted that if a statewide administrator could confirm the customer's income eligibility and share this information with public utilities, it would simplify the customer's ability to enroll in multiple programs and expedite eligibility determinations. FirstEnergy Comments at 13.

EAP and Columbia recommended establishing a working group to determine which application items are common across public utility programs and the potential costs of standardization. Peoples and PPL also support collaboration. PPL contends substantial coordination and collaboration would be necessary by public utilities, stakeholders, and the PUC to address differences in CAPs as part of this standardization effort. EAP Comments at 15-16, Columbia Comments at 11-12, Peoples Comments at 8, and PPL Comments at 9.

The Utility Justice Advocates also supported convening a working group to standardize the following universal service procedures: processing timeframes, notices, income inclusions/exclusions, acceptable income documentation, categorical eligibility

and verification, language access, outreach, use of community-based organizations (CBOs), appeal process, and USECP reviews. The Utility Justice Advocates further recommended the PUC standardize the eligibility, benefits, terms, and conditions for all universal service programs in regulation. This includes adopting consistent definitions and program requirements for household income, household composition, identification requirements, and income documentation. Utility Justice Advocates Comments at 24, 47-48.

The City of Philadelphia recommended the PUC work with DHS to have the CAP eligibility questions added to the COMPASS application[6] which would allow customers to apply for multiple assistance programs with one application and reduce administrative burdens on government agencies, public utilities, and customers. City of Philadelphia Comments at 2.

EAP and some public utilities identified barriers to establishing standardized CAP forms and procedures, including:

- Differences in eligibility between public utilities could result in a lengthy common application.
- Potential impact on third-party vendors and CBOs.
- System updates associated with CAP standardization, whose costs will be recovered from other ratepayers.
- Potential impact on CAPs if public utilities were required to administer the programs in the same way (*i.e.*, no longer able to design CAPs based on the needs of customers in a specific service territory).

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[6] https://www.compass.state.pa.us/

- Potential increase in administrative costs and processing times for public utilities if they are required to contact the customer to obtain information not collected in a CAF.

Aqua Comments at 6-7, Columbia Comments at 11-12, Duquesne Comments at 9-10, EAP Comments at 15-16, NFG Comments at 6, Peoples Comments at 8, and PGW Comments at 10.

PECO asserted a standardized statewide application may be lengthy and require frequent revisions as individual public utility programs evolve. As an alternative, PECO recommended the PUC consider allowing public utilities with the same or overlapping service territories the flexibility to develop their own standardized CAP application, which could be less lengthy and require fewer revisions. PECO Comments at 13.

Agway questioned how standardizing CAPs and establishing a cross-enrollment process will impact the ability of CAP-eligible customers to shop for electric or natural gas service. Agway noted many CAP customers cannot shop for suppliers. So, a customer who enrolls in CAP for one public utility – and then is automatically enrolled in a CAP for another public utility – may not understand why they can no longer shop for a supplier with the second public utility. Agway recommended the PUC ensure customers "opt-in" to participate in CAPs after the terms and restrictions of the program are clearly explained. Agway Comments at 3-5.

Universal Service Common Application Subgroup

The Universal Service Common Application Subgroup (Common Application Subgroup) was formed to provide recommendations and feedback on the first USWG objective in the PUC's August 22 Secretarial Letter:

Developing a common application that could be used by all jurisdictional fixed public utilities statewide to facilitate the enrollment of eligible customers into their utilities' universal service programs.

August 22 Secretarial Letter at 1.

A total of 66 individuals registered to participate in the Common Application Subgroup, representing the following organizations: Broadband Communications Association of PA, Aqua, Citizens Electric, City of Philadelphia, CLS, Columbia, Duquesne, EAP, FirstEnergy, Keystone Energy Efficiency Alliance (KEEA), MCR Performance Solutions, NFG, OCA, Oracle Energy & Water, PA American Water Company (PAWC), Pennsylvania Coalition of Local Energy Efficiency Contractors, Inc. (PA-CLEEC), PECO, Peoples, PGW, Philadelphia Water Department, PPL, PULP (on behalf of CAUSE-PA and Pittsburgh United), PWSA, UGI, Valley Energy, and Wellsboro Electric.

The Common Application Subgroup met four times from October 2023 through January 2024.[7] At the first meeting, it was established that a universal service CAF should:

1. Be as simple as possible and ask for only the information necessary to determine eligibility.
2. Obtain sufficient information to allow public utilities to identify the household's account and process the application.
3. Be accessible through multiple mediums (*e.g.*, online, telephone, and mail).

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[7] The Common Application Subgroup met on 10/19/23, 11/9/23, 12/14/23, and 1/23/24.

As a starting point, the Common Application Subgroup reviewed each question in the Proposed Pittsburgh CAF and discussed which data elements to remove, change, or add in a statewide universal service CAF. The Proposed Pittsburgh CAF consisted of the following questions:

- Name of Applicant, Account Holder (Y/N)
- Service Address
- Mailing Address
- Address of Residence (if different)
- Telephone Number, Cell phone (y/n)
- Email Address
- Permission to receive application info via text messages
- Main heating source (Gas, Electric, or other)
- Own or rent residence
- Service shut off (y/n), Shut off notice (y/n)
- Receive financial assistance for a disability
- Total number of occupants: adults, and children
- Name, DOB, Social Security Number (optional), and income for each household member
- Consent to share info with other public utilities
- Signature

The Common Application Subgroup also reviewed the work Philadelphia Gas Works is doing redesigning their CAP application. PGW conducted a series of online surveys and panels to solicit customer feedback on components of their proposed revised application with the purpose of making it easy to understand and complete. A few of the main takeaways include:

- Creating a large print version for visually impaired customers.
- Adding a Frequently Asked Questions section to help educate customers and answer any questions they may have.
- Making details about the program easier to understand. i.e. "Arrearage forgiveness" and "150% of the Federal Poverty Line".
- Informing applicants why sensitive information is needed and how it will be protected.
- Understanding the importance of font size and color, and the order of sections to be intuitive to customers.

The Common Application Subgroup also identified (1) supplemental information/instructions for customers that should be included with the CAF; (2) additional factors which should be taken into consideration when developing, implementing, and evaluating the CAF; (3) situations which the CAF does not address; and (4) actions or directions needed from the PUC in order to implement the CAF.

The recommendations and feedback of the Common Application Subgroup are summarized below. Unless otherwise indicated, these recommendations reflect the general consensus of the Common Application Subgroup (*i.e.*, proposals that were either broadly supported or not broadly opposed by Common Application Subgroup participants at the meetings).

Recommendations of the Common Application Subgroup

Proposed CAF

The Common Application Subgroup recommends that a universal service CAF should request the following information:

- Service shut off (y/n), Shut off notice (y/n)
    - *This was identified as the appropriate first question in order to prioritize the processing of applications where utility service is off or in threat of termination.*

- Name of Applicant

- Service Address

- Mailing Address (if different)

- Primary and Secondary (Cell) telephone numbers

- Email Address

- [checkbox] Permission to receive email and text messages (Msg/data rates apply)

- (optional) Do you rent your home? (y/n)
    - *Question is optional because it is not necessary to determine eligibility. Can help public utilities identify accounts for tenants that qualify for specific legal protections.*

- Total number of occupants: adults and children

- Name, date of birth, and income amount/source(s) for each household member

- Names of utility companies[8] and consent to share application information

- Signature

- Zero-Income Form, if needed

The Common Application Subgroup also recommend the CAF include "taglines" in different languages to instruct customers with limited-English proficiency who they can contact for assistance.

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[8] The Common Application Subgroup recommend the CAF include a list of utilities to select (via a checkbox) instead of asking the applicants to provide the name of each utility that provides service to their household. This could help applicants who may not remember the names of their utilities but might recognize the names on a list. In an online application, the list of utilities could be limited to those who serve the applicant's zip code (similar to the process used for PAPowerSwitch).

Based on these data elements, PUC staff developed a proposed "paper" CAF to reflect the general consensus of the group. The Common Application Subgroup reviewed and revised the document at the meetings held on 12/14/23 and 1/23/24. Below is the final version of the proposed paper CAF, reflecting the data elements recommended by the Common Application Subgroup:

Pennsylvania Utility Assistance Application Form

If one or more of your utility services are currently off, please identify which ones:
☐ Electric   ☐ Water   ☐ Natural Gas   ☐ Wastewater

If you have a shut off notice from one or more utilities, please identify which ones:
☐ Electric   ☐ Water   ☐ Natural Gas   ☐ Wastewater

Please contact your utility immediately if your service is off or in threat of termination - additional assistance may be available.

Name of Applicant (First Name, Middle Initial, Last Name)	**Email Address**

Service Address (ex. Number and Street, Apt #, City, State, Zip)

Mailing Address – if different from Service Address

Home Phone Number	**Cell Phone Number**

☐ Check here to receive email and text alerts regarding your application (text msg and data rates may apply).

(*Optional*) **Do you rent your home?**
☐ Yes   ☐ No

Total number of household occupants, including you - Adults (age 18 and over) : _____   Children: _____

Please provide the following information for <u>all</u> members of the household (adults and children), including you :

First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)

If there are additional members in your household, please include their information on a separate sheet of paper.
If no adults in your household have income, please complete and sign the attached zero-income statement.

Pennsylvania Utility Assistance Application Form

By selecting my utilities below, I understand I am consenting to share my information with them for the limited purpose of helping me enroll and/or recertify in utility assistance programs that I qualify for. I understand these utilities may need to contact me for additional information before determining my eligibility for their assistance programs.

Please select the utilities that provide your electric, water, and natural gas:

Electric	Water/Wastewater	Natural Gas
☐ Duquesne Light	☐ Aqua	☐ Columbia Gas
☐ Met-Ed	☐ PA American Water	☐ National Fuel Gas
☐ PECO-Electric	☐ Pittsburgh Water and Sewer Authority	☐ PECO-Gas
☐ Penelec	☐ Veolia	☐ Peoples Natural Gas
☐ Penn Power	☐ York Water	☐ Peoples Gas LLC
☐ PPL		☐ Philadelphia Gas Works
☐ West Penn Power		☐ UGI Gas
☐ UGI Electric		

Note: If you do not see your utilities listed above, please contact them directly to find out if they offer any assistance programs.

I affirm that all information on this application is true and complete to the best of my knowledge. I am aware that I can be penalized for making false statements.

Signature: _____

Date: _____

ATTENTION: This is an important notice! For information in your language, call ###-###-#### or visit www.utility.com/li
ATENCIÓN: ¡Este es un aviso Importante! Para recibir información en su idioma, llame al ###-###-#### o visite www.utility.com/li
注意：这是重要通知！如果您需要以您的语言获得此信息，请致电 ###-###-#### 或访问 www.utility.com/li
CHÚ Ý: Đây là thông báo quan trọng! Nếu bạn cần thư này bằng ngôn ngữ khác, vui lòng gọi ###-###-#### hoặc truy cập utility.com/li
주의: 중요 통지입니다! 이 서신을 귀하의 언어로 받고 싶으시면 ###-###-####번으로 전화하시기 바랍니다 또는 utility.com/li를 방문하십시오.
ملاحظة کـ □□□ں ، utility.com/li :توجہ فرمائں بن □□کف ض 215□ □□ورى اطلاع ناسہ -686-پر کال ک 8686 □□□ں □□ □□ترج ! □□□خدمات □□□ □□ى
ATTENTION: Cet avis est important! Si vous avez besoin de cet avis dans une autre langue, appelez le ### ###-#### ou visitez utility.com/li

When a household reports no income for any adult household members, the Common Application Subgroup recommends the applicant complete the standardized Zero Income Form developed by a separate USWG in 2018.[9] The Zero Income Form consists of the following statements/questions:

Household Zero Income Claim:
I, _____ , state that no adult member of my household is currently receiving income from any source.
Household Expenses:
Identify how you and your household meet monthly living expenses, such as those expenses for housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone bill).   Check all that apply: ☐ I am using money from savings. ☐ I receive financial support from friends/family/community. ☐ Other. Please explain below:
Affidavit:
I certify that the information presented in this application is true and accurate to the best of my knowledge. I understand that providing false information in this application is grounds for denial and dismissal of my application. I acknowledge that I am responsible for notifying _____ if my household or income information changes.

Signature:_____   Date: _____

Areas of Non-Consensus

The Common Application Subgroup determined that questions about "Address of Residence" and "Financial assistance for a disability" included on the Proposed Pittsburgh CAF should not be included in the Universal Service CAF. The Common Application Subgroup did not reach consensus on other questions which are not included in the CAF above, such as:

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[9] In a Secretarial Letter issued on March 28, 2018 at Docket No. M-2017-2596907, the PUC initiated a USWG with a mandate that included standardizing utility zero-income forms. Participants in the 2018 USWG included representatives from the EDCs, NGDCs, PULP, CLS, OCA, United Way, Dollar Energy Fund, KEEA, and the Office of Small Business Advocate. The working group reached consensus on a zero-income form that contains all required questions if a CAP applicant claims no income for adults in the household.

- **Requesting Social Security number for household members, full or last four digits (optional)** – The Common Application Subgroup did not reach consensus on whether optionally requesting SSNs on the CAF was necessary to confirm a customer's identity or account information.

- **Requesting the account holder name and account number** – The Common Application Subgroup did not reach consensus on whether the CAF should request the account holder name and account number for each public utility identified on the application, even as optional information. Some participants noted that having this information would make it easier for public utilities to find the customer's account, as there may be issues locating an account relying only on names and street addresses. Other participants were concerned that requesting account information for each public utility, even optionally, could (1) make the CAF personally identifiable information (PII) that could put the customer at risk if improperly shared or disclosed; or (2) present a barrier to enrollment if a customer transposed an account number or simply did not have the account number at hand when they are filling out the application (if they are accessing the application at a kiosk away from home, for example).

- **Requesting the household's main heating source (Gas, Electric, Steam, or other)** – The Common Application Subgroup did not reach consensus on whether to remove the question asking for an applicant to identify a household's main heating source. This information is necessary for the public utility to determine whether the account should be classified as a heating or non-heating account. This classification establishes the customer's target energy burden level (maximum monthly CAP bill) and maximum annual CAP credit limits. It can also establish whether a water account should be protected under the winter termination

provisions at 66 Pa.C.S. §1406(e) if the household is using water for heating. Some Common Application Subgroup participants supported removing this question because customers often answer it incorrectly and could be more accurately gathered through direct contact between the public utility and the customer. Other participants proposed keeping this question on the application and making it optional.

Supplemental information/instructions for customers

The Common Application Subgroup recommends that the CAF should provide information that helps to explain why and how a customer should complete the application process. This information should include:

- Brief description of utility programs – Explain what types of programs are available and what benefits they can provide.

- Program eligibility requirements – At a minimum, identify the maximum household income limits for program eligibility.

- Instructions on how to complete the application – On a website application, these instructions could be included in a clickable icon next to each question.

- Required documentation (*e.g.*, proof of income or identity) – Identify what types of verification/documentation the customer must provide and how to submit it.

- Contact information – Provide a contact number for assistance in completing the application.

Additional Considerations when developing, implementing, and evaluating the CAF

Common Application Subgroup participants also recommend the PUC take the following additional factors into consideration as part of a transition to a CAF:

- <u>Accessibility</u> – The CAF should be accessible in multiple languages. Ideally, the CAF should be available in all languages spoken in Pennsylvania.

- <u>The CAF should not be limited to public utilities with universal service programs</u> – Additional public utilities with low-income programs should be allowed to participate in the CAF, beyond just the larger electric, natural gas, water, and wastewater public utilities which operate established universal service programs. These include smaller electric, natural gas, and water/wastewater public utilities that are not required by statute or PUC Order to operate a universal service program.

- <u>CAF Implementation timeframe</u> – The time needed for public utilities to implement a CAF would depend on the cost of any system changes needed. When evaluating implementation costs, potential cost-savings of using the CAF should also be considered (*e.g.*, decreased time spent verifying eligibility).

- <u>Public utility and low-income customer interactions</u> – The CAF should allow customers to apply once for all programs offered by their public utilities without having to contact (and apply with) each individual public utility. Some public utilities in the Common Application Subgroup noted that contacts for assistance allow them to build relationships and trust with their low-income payment-troubled customers. The CAF process may reduce these types of interactions.

Non-Consensus Consideration

- Application processing and enrollment – Some Common Application Subgroup participants assert that reducing the amount of data collected on a CAF may require public utilities to contact the customer for additional information to establish their eligibility or benefits for certain programs, which can delay application processing or program enrollments. Other participants contend that public utilities should not require additional data from the customer in order to establish their eligibility for programs.

Situations not Addressed in the CAF

The Common Application Subgroup identified situations that may complicate the use of a CAF, such as when:

- The applicant is not a member of the household (*e.g.*, relative or a friend).
- An account holder is no longer in the household (*e.g.*, PFA situations).
- The household is currently enrolled with an electric and/or natural gas supplier.
- A single household may have different account holders for each public utility. Authorization from the account holder may be necessary before the household can be enrolled in a public utility's CAP or other universal service programs.

Public utilities may need to contact eligible customers to address these situations before enrolling them in programs.

Actions/decisions needed from the PUC

The Common Application Subgroup identified the areas where PUC action may be needed in order to further implement a statewide CAF, including:

- Establishing whether CAPs can be administered by a statewide agency/organization or individual public utilities – How the CAF will operate as the sole application for all public utility programs will depend on whether a statewide agency/organization or individual public utilities administer CAPs in the future.[10]

- Standardizing verification policies and requirements – In order for the CAF to determine a customer's eligibility for all public utility programs, verification policies and requirements would need to be standardized. Currently, public utilities may have different policies and requirements regarding what documents customers must provide to verify the income and identities of household members.

- Establish how customer information should be securely shared with public utilities – Using the CAF as the sole application for all public utility programs will require the secure transmission of customer data from a statewide administrator to public utilities, or from one public utility to other public utilities, or both. Protections would need to be put in place to ensure the information shared does not put customer data at risk of unauthorized disclosure.

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[10] Questions regarding this issue include: If administered by a statewide agency/organization, will that agency be responsible for determining eligibility or only forwarding the application and documentation to each utility? If administered by each public utility, how should they share this information with other public utilities who serve the customer?

- <u>Allow necessary modifications to public utility USECPs</u> – Once a process and timeframe to implement the CAF is established, public utilities may need to modify their USECPs as they relate to applications and intake to ensure their policies are consistent with the new process.

Universal Services Website Report

Background

In the March 27 Secretarial Letter, the PUC asked stakeholders to comment on how public utilities' universal service programs may be improved, including what additional consumer education and outreach could be undertaken to make more low-income consumers aware of the benefits available to them. March 27 Secretarial Letter at 3, Question #7.

Comments filed to the March 27 Secretarial Letter contained many references to consumer education and the efforts included in public utility USECPs, but there were fewer comments that discussed a potential universal service website.

Opower recommended the creation of a one-stop shop that shows customers all the programs they are eligible for, including CAPs, LIHEAP, and LIURPs. Opower Comments at 3-5.

Kleeman, *et al*. addressed the impact outreach and education in an article titled *Effects of redesigning the communication of low-income residential energy efficiency programs in the U.S. Energy Policy*.[11] The article by Kleeman, *et al*. offered recommendations on what content to include on a website to increase enrollments in weatherization programs.

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[11] https://doi.org/10.1016/j.enpol.2023.113568.

NAWC noted one of its members uses a QR code to direct customers to quickly access information about the CAPs of several local public utilities. NAWC Comments at 7-8.

The Utility Justice Advocates discussed how a centralized intake and data interface should be designed. Any website developed as part of this statewide application system is mobile accessible and allows for documents to be uploaded from a mobile phone. Utility Justice Advocates Comments at 30.

Also, various public utilities cited their own online enrollment efforts in their comments.

These comments were highlighted at the first meeting of the Website Subgroup.

Universal Service Website Subgroup

The Universal Service Website Subgroup (Website Subgroup) was formed to provide recommendations and feedback on the second USWG objective in the PUC's August 22 Secretarial Letter:

> Discuss the potential development of a website dedicated to facilitating the enrollment of customers into [public] utilities' universal service programs using, among other tools, the common application […].

August 22 Secretarial Letter at 1.

A total of 57 individuals registered to participate in the Website Subgroup, representing the following organizations: Aqua, City of Philadelphia, Citizens' Electric, CLS, Columbia, Duquesne, EAP, FirstEnergy, MCR Performance Solutions, NFG, OCA,

Oracle Energy & Water, PA-CLEEC, PAWC, PECO, Peoples, PGW, PPL, PWSA, PULP (on behalf of CAUSE-PA and Pittsburgh United), UGI, Valley Energy, and Wellsboro Electric.

The Website Subgroup met (virtually and in person) three times, on October 26, 2023; November 21, 2023; and December 14, 2023. PUC staff from BCS, Communications and Law participated in the meetings.

PUC Communications staff used a series of questions to facilitate each meeting. These questions focused on, among other things:

- The purpose for the website.
- Who should administer the website.
- How the website should be funded.
- Using PAPowerSwitch and other state or organization websites that could be used as models for this potential effort. *See* Appendices A and B.
- Whether and what educational material should be included on the website.
- Security, confidentiality, or data concerns.
- How to create awareness that this is an official website of the PUC and differentiate it from copycats.

The discussion among Website Subgroup members at these meetings identified areas of potential consensus and agreement that form the basis for the recommendations of the Website Subgroup outlined below. Website Subgroup members noted that the new website also would incorporate and benefit water and wastewater utilities and their customers.

Recommendations of the Website Subgroup

Proposed Universal Service Website

The following are areas of general consensus and agreement regarding a potential universal service website, with summaries added based on comments from the Website Subgroup:

- **Goals of the website are streamlined customer enrollment, efficiencies for public utilities, and protection of data.** The Website Subgroup reached consensus that the website's purpose should be to ease enrollment for eligible consumers into all universal service programs. The website should allow customers to complete one application for all programs and submit eligibility documentation on the site, to be accessed by public utilities. The website should enroll customers easily, see if they are eligible and ensure they receive benefits quickly. A major emphasis was on achieving efficiencies for public utilities and their customers and avoiding redundancies. Any website would require data security measures.

- **The website would serve as a centralized and secure enrollment portal for accepting universal service applications.** Website Subgroup members agreed that the website should act as a portal for customers to apply. Website Subgroup members noted that it is easier to submit documentation through a portal than email. The Website Subgroup recommends using the website as a centralized location to streamline the application process. The purpose of the website should be to make it easier to enroll, instead of just linking to different public utility programs.

- **The website should be a one-stop shop for customers where they can apply for all programs offered by their public utilities and submit documentation proving eligibility.** A goal often expressed by the subgroup members was to create efficiencies for the public utilities, while making the application process easier for their customers. The Website Subgroup noted the importance of the website being a secure, centralized platform where the applicants have one place to submit their verification documents, rather than having to submit them multiple times in multiple places. Uploading documents once to a secure server also lessens the risk of data breaches. This process would create efficiencies by having a one-stop shop for customers.

- **The website should not be a referral site but an enrollment portal.** Website Subgroup members considered but ultimately did not support a referral website, where customers would leave the site (directed by links) to enroll for programs on public utility websites. Customers should be able to use the website to apply.

- **A Statewide CAP Administrator is not necessary to have a website with a common application, so the question of whether CAPs are administered by a statewide administrator does not need to be settled before implementing a website.** Website Subgroup members expressed that a single portal could be beneficial even in the absence of a Statewide CAP Administrator, using DHS's data-sharing process as a model. The Website Subgroup recommends that decisions related to a Statewide Administrator should be independent from decisions needed to move forward with a website. The website would allow consumers to complete a common application and upload their information, and public utilities could log in and access the information securely. This process would not require a Statewide CAP Administrator.

- **Incorporate the CAF into this website.** Website Subgroup members saw value in marrying the common application with the website to allow customers to log in and fill it out and have it submitted to the customer's public utilities. Whether allowing customers to identify their public utilities through a zip-code functionality, similar to PAPowerSwitch, or from a list of participating public utilities, the site could "push" the common application to the correct and appropriate public utility. Or, alternatively, the site could be designed to allow utilities to "pull" the common application information through a centralized data portal for processing enrollments. For service territories where multiple public utilities serve overlapping zip codes, there could be a pop-up to ask consumers to check their bills to confirm their public utility. The common application and website would allow customers to submit all information to their public utilities at one time and eliminate duplication of efforts (*i.e.*, the need to apply with each public utility individually).

- **Pending consultation by a cybersecurity expert, the website could include a data repository where data can be accessed by public utilities.** Website Subgroup members said public utilities, contractors and the website admin should access this data. From a PII perspective, it is much easier for customers to keep their own data safe when they enter it on one website, versus entering it on multiple public utility websites. Website Subgroup members said it would be more secure for a customer to enter their information into a portal that the public utility or Statewide CAP Administrator can access.

- **A cybersecurity expert should be consulted on the website's enrollment and data storage processes.** Website Subgroup members repeatedly suggested that a cybersecurity expert be consulted to address the security concerns, particularly related to the issues of creating customer accounts, storing data on the website, and processing the common application. The group advised there are logistics of

the sharing and confirmation process (between the customer and the website and the website and the public utility) that need to be worked out.

- **The website should be administered by the PUC and funded through its budget process and assessments on public utilities.** Website Subgroup members said the customers can trust a government website whether administered by the PUC or by DHS, more than a third-party site. The Website Subgroup reached a consensus recommendation that the PUC should host it. This view was shared by public utilities, environmental organizations, consumer advocates, etc. There was concern that having DHS administer the website would require the combining of taxpayer and ratepayer funding. A representative of DHS noted that, if DHS was tasked with administration, the function of this website would need to be combined with COMPASS, and processing applications for all of DHS's other programs would need to take priority. This task is also not something that DHS could address within the next few years. Website Subgroup members said the new website would have to be part of the PUC's budget and public utility assessments and needs to go through the normal legislative process to establish funding (see actions and decisions section below). This includes funding for upfront development costs as well as ongoing costs for maintenance.

- **The website may use PAPowerSwitch as a model.** The subgroup favored the zip-code functionality of PAPowerSwitch, its searchability and ease of navigation, but noted that customers do not enroll with a supplier directly on that platform. The difference with the proposed universal service website is the possibility of collecting, forwarding and/or processing application information.

- **The website should allow customers to create accounts or log in as guests, like DHS's COMPASS.** There was consensus among the Website Subgroup that the website should model DHS's COMPASS when it comes to creating accounts when

applying. Website Subgroup members recommend customers should be given the option to create a login and account when applying or submit the application as a guest without creating an account.

- **The website should allow customers to come back and complete their applications later.** Website Subgroup members recommend customers should be able to create a login and account to complete and access their application information on the site. If someone does not complete their application, they should be able to log in and complete the application later. Pop-ups or other messages could make the customer aware of how to complete the application and the processing timelines.

- **Use the Department of Insurance educational site and Pennie enrollment site as models.** The Department of Insurance educational page[12] provides information about Pennie,[13] Pennsylvania's insurance marketplace. These websites could be used as a model for how to present universal service educational content on the PUC main website and enrolling customers in programs on the new universal service website.

- **Pop-up messages on the website could explain the application submittal and approval process and notify customers with a termination notice to contact their public utility.** The Website Subgroup mentioned several possible uses for "pop-up" messages (or some similar functionality) for consumers to contact their public utility if they have received a termination notice. If they don't complete their application, they could see a pop-up asking if they are ready to fill out or complete the application. Pop-ups or other messages also can guide customers through any errors when completing the application. Pop-ups/messages could also

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[12] https://www.insurance.pa.gov/Coverage/Pages/how-to-get-health-insurance.aspx
[13] https://pennie.com/

describe that some public utilities have enrollment restrictions such as those related to shopping for suppliers or budget billing.

- **Educational material should be included on the website or a partner website.** The Website Subgroup said education is a core component. There should be educational content regarding the programs and how to enroll. There could be FAQs on the website for questions. The Website Subgroup also recommends updating universal service information on the existing PUC website to become more accessible and informational about these programs, like how the Department of Insurance provides education on its enrollment program (see above). The universal service website then would be separate from but linked to the educational material on the PUC website. The Website Subgroup reached consensus on the inclusion of educational content, but some of that content may be on the PUC's primary website.

- **A new website should be uncluttered and achieve a balance between enrollment and education.** The Website Subgroup members agreed that the website should not be cluttered but be balanced in the way it educates customers about reducing energy bills and finding assistance. Customers not eligible for assistance programs could be directed to other forms of available assistance (such as community organizations and budget billing). To avoid confusion, information should be provided in an organized, understandable manner. It is important for people to understand what they are enrolling for and how their information will be used. It is also important to direct customers to any federal assistance programs that they may also be eligible for. Universal service programs are designed as a cohesive whole to help customers reduce their usage and make their bills more affordable. Including educational information on the PUC's primary website may be a way to reach this balance.

- **The website should be optimized for mobile viewing and have a mobile app.** Website Subgroup members said the new site should be accessibility on mobile devices. They also were in favor of having a mobile application with the ability for consumers to take a photo of documentation and submit it.

- **The website should feature language and disability accessibility.** Website Subgroup members said the new website should be accessible to customers who speak different languages or have a disability.

- **A live chat feature can be further explored before implementation.** Some members recommended offering chat support on the website, which may necessitate hiring staff. Other members pointed out the complexity of this feature as it relates to AI and possibly hiring additional staff at the PUC. The issue deserves further vetting due to at least initially positive discussions among subgroup members.

- **The website should be branded as an official PUC site for public awareness due to copycat sites.** The Website Subgroup members said consideration should be made for search engine optimization, paid advertising and/or updates to existing public utility marketing materials to create customer awareness of the website. The Website Subgroup also recommend establishing a plan on how the PUC will inform people about the website and create public awareness. Concerns over lookalike or copycat sites make website marketing more imperative. Website Subgroup members recommended talking to other state agencies about how they differentiate their sites from copies.[14]

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[14] PUC staff noted that PAPowerSwitch is branded as an official PUC website.

Actions/Decisions Needed from the PUC

If the PUC adopts the recommendations of the Website Subgroup and decides to move forward with establishing a website to facilitate the enrollment of customers into public utilities' universal service programs, using, among other tools, the CAF, the following administrative steps will need to be addressed:

- Establishing a budget to create and maintain the website – The PUC will need to establish initial and ongoing funding for this project and determine how spending on the website will be assessed and recovered from public utilities. It was noted that the addition of the website would also increase costs to utilities and that cost recovery questions should be addressed.

- Address cybersecurity and data storage issues – The PUC should establish processes and protocols to protect customer PII entered and stored on the website, via a CAF and other means, prior to implementation.

- Considering additional staff to maintain and support the website – Depending on how a central website and CAP administrator is set up – particularly if the website administrator will verify customer income information or process applications – additional staffing may be needed at the PUC. The level of staffing will depend, among other things, on whether there be a live chat option during working hours and whether applications will need to be handled/reviewed/accessible by BCS staff for some reason before being passed through (possibly automatically) to public utilities via the website. PUC Communications may also have additional work requirements for managing this website in addition to the PUC homepage, PAPowerSwitch and PAGasSwitch. Additional IT staffing may also be necessary based on whether the PUC or a third-party vendor host and maintain this website.

Appendix A: PAPowerSwitch

The Website Subgroup had significant discussion at all three meetings of the Website Subgroup about the PUC's prior development and current administration of PAPowerSwitch. As stated in the first meeting, the focuses of PAPowerSwitch and the universal services enrollment sites are different, but both would be single focused, user-friendly websites.

In February 2010, the PUC's Offices of Communications and Competitive Market Oversight worked with vendors to launch PAPowerSwitch, as rate caps on the generation portion of the bills were expiring from consumer bills as prescribed by the 1997 restructuring of the electric industry. By January 1, 2011, all electric rate caps were set to expire, increasing electric bills.

The PUC's energy shopping websites – PAPowerSwitch.com and PAGasSwitch.com – enable energy consumers to quickly compare offers from competitive suppliers with the default service rates from their local public utilities and learn more about switching to a competitive supplier. The centerpiece of the websites is functionality to allow consumers to identify their public utility service territory (and the competitive options available to them) by their zip code, modeled after websites maintained by other state public utility commissions in Texas and Connecticut.

PAPowerSwitch has won awards and served as a model for other states and has high monthly view statistics.

It was paid for by the PUC, with ongoing funding recovered through assessments on electric and natural gas suppliers. The PUC spent about $342,000 to create and make Pennsylvanians aware of PAPowerSwitch. The PUC currently supports PAPowerSwitch and PAGasSwitch with a maximum annual combined budget of $150,000.

The website was developed in phases. As relayed to the Website Subgroup, PAPowerSwitch started with offers from OCA's shopping guide populating the site. Other early features included the PUC's list of competing suppliers, general consumer and business education, energy conservation tips to help offset prices, Frequently Asked Questions, a "Tell a Neighbor" sharing feature, and basic PUC contact information to address questions from residents, businesses or the media.

Zip codes provided by the Energy Association were then added in spring 2010. Also added were backend administrative access so PUC staff could manually update rates, an "Understanding Your Bill" feature, consumer alert emails, and Spanish site translation. Pages and functionality related to small businesses, renewable energy, and lessons learned through the 2014 Polar Vortex were launched.

Appendix B: Models from Other States and Organizations

BCS conducted a review of other states' websites and found examples for the Maryland Department of Human Services' Office of Home Energy Programs, the New Jersey Department of Community Affairs and the PUC of Ohio. BCS provided the following links during our first subgroup meeting:

- https://puco.ohio.gov/utilities/electricity/resources/utility-assistance-programs
- https://dhs.maryland.gov/office-of-home-energy-programs/
- https://www.nj.gov/bpu/assistance/programs/

Members of the subgroup also offered the following additional examples:

- ComEd: An Exelon Company: https://secure.comed.com/assistance/landing
- The Maryland Department of Human Services:
  https://mymdthink.maryland.gov/home
- NYSERDA (New York State New York Energy Advisor):
  https://energyadvisor.ny.gov/

Statewide CAP Administrator Subgroup Report

Background

In the March 27 Secretarial Letter, the PUC asked stakeholders to comment on (1) using one public utility or third-party entity for CAP intake and (2) implementing a statewide administration of CAPs. March 27 Secretarial Letter at 2-4, Questions #1 and #5.

Many commenters recommended that the PUC refrain from mandating additional changes to the CAP design until all public utilities implemented the recent changes to the CAP Policy Statement and the impact of those changes is evaluated. Many commenters also recommended that the PUC wait until DHS has implemented the upcoming LIHEAP Data Sharing process and the results are analyzed. Columbia Comments at 4-5 and 8, EAP Comments at 7 and 10-12, NFG Comments at 3-4 and PECO Comments at 4-5 and 9-10.

Commenters who opposed having one public utility administer CAP enrollments for all public utilities noted several concerns, including:

- Legislative changes may be necessary to mandate this approach, including changes to the universal service cost-recovery mechanism to allow ratepayer funds from one public utility to pay for CAP intake administered by another public utility.
- One public utility or third-party entity would need to be trained on the differences between the policies and procedures for each public utility's universal service programs.

- One public utility may not have the staffing or resources to conduct intake for all other public utilities.
- Requiring customers to apply with an unfamiliar public utility or third-party entity could create confusion and erode customers' trust in their public utility.
- The PUC would need to establish rules addressing liability for errors or improper use of data and what entity (*e.g.*, the intake public utility or the administering public utility) would be responsible for responding to related customer complaints.
- Limit each public utility's oversight of the intake process and ability to make improvements.
- Require new spending levels to establish secure transmission of customer information between the intake public utility and the other public utilities. Public utilities would incur "sunken" costs from dismantling their intake systems and networks.

Columbia Comments at 3-4, Duquesne Comments at 4-5, EAP Comments at 6, FirstEnergy Comments at 2-3, NAWC Comments at 7, NFG Comments at 3, PGW Comments at 3-4, and PPL Comments at 3-5.

NAWC asserted that the Public Utility Code does not give the PUC authority to require public utilities to delegate CAP administration to a third-party. NAWC Comments at 7.

Most commenters preferred using a state agency or outside entity for the statewide CAP administrator versus using one public utility. The Utility Justice Advocates recommended that CBOs continue to be involved in a statewide CAP administration model and process applications using a centralized data hub. This is similar to the process used by DHS in its administration of LIHEAP, where it establishes the policies and program rules and the local County Assistance Offices accept and process applications. Utility Justice Advocates Comments at 28-29.

Commenters raised the following concerns with implementing a statewide administration of CAP:

- Whether the PUC has the authority under the Competition Acts to direct this change.
- Whether the benefits of establishing statewide administration would outweigh the costs involved of building this new system and dismantling the systems public utilities currently use.
- Whether a single-source intake process would create a duplicative application process.
- How removing administration of CAPs from public utilities would impact their ability to: (1) modify the programs to meet the needs of customers in their service territories; and (2) establish relationships and trust with low-income customers.
- What challenges a statewide entity would face in regard to staffing, training, and IT resources.
- How the statewide entity would be held accountable for its actions, its costs, and its quality of service and how the costs would be recovered.

Columbia Comments at 5-6, EAP Comments at 7-8 and 10-12, FirstEnergy Comments at 5-6, NAWC Comments at 7, NFG Comments at 3-5, OCA Comments at 6-7, PECO Comments at 7, Peoples Comments at 3-4, PWSA Comments at 1, and Utility Justice Advocates Comments at 14-15.

Arguments raised by commenters in support of statewide administration of CAP include:

- That it would create a centralized process for handling verification, enrollment, and recertification; increasing efficiencies, reducing redundancies, lowering administrative costs.

- That it would require a uniform CAP application, standardized eligibility criteria and benefits, and a centralized data hub.

- That statewide administration of CAPs is handled successfully in Maryland, New Jersey, and Ohio by having the same department that administers LIHEAP also administer CAP.

- It creates an opportunity for administrative costs to be recovered from taxpayers and total CAP benefit costs to be spread out among all public utility ratepayers.

- By spreading total CAP benefit costs out among all public utility ratepayers, it may avoid ratepayers of certain counties from disproportionality paying for increased costs compared to others, as some counties have higher than average poverty rates than others.

- If DHS administered CAP, LIHEAP benefits could be integrated into CAPs to subsidize CAP credits and arrearage forgiveness.

- That it could increase program enrollments by eliminating barriers.

- That it could benefit all ratepayers by preventing the accrual of arrears for low-income households.

Columbia Comments at 7-8, Duquesne Comments at 7, FirstEnergy Comments at 8-9, OCA Comments at 14, PGW Comments at 5-8, and Utility Justice Advocates Comments at 27-29.

The Utility Justice Advocates recommend that the PUC directly oversee the administration of a centralized system, through BCS or a new bureau, to ensure data integrity, protection, and coordination across overlapping service territories and state and federal assistance programs. Utility Justice Advocates Comments at 30.

OCA also supported establishing statewide administration through a separate PUC bureau or contracting with a third-party. OCA suggested that the PUC convene a working group with a defined time frame to determine specific steps needed for statewide administration. OCA Comments at 14.

Most commenters supported data sharing between public utilities for the purpose of cross enrollment in public utility assistance programs with the customer's informed consent. The Utility Justice Advocates and CAC stressed that any intake process should maintain community-based organizations (CBOs) as a source of CAP enrollments and processing. CAC Comments at 3 and Utility Justice Advocates Comments at 28-29.

Statewide CAP Administrator Subgroup

The SCA Subgroup was formed to provide recommendations and feedback on the third USWG objective in the PUC's August 22 Secretarial Letter:

> Discuss the requirements of a statewide administrator, or some other
> agency, bureau or entity, to administer universal service enrollment
> statewide, including the potential website […].

August 22 Secretarial Letter at 1.

A total of 63 individuals registered to participate in the SCA Subgroup, representing the following organizations: Broadband Communications Association of PA, Aqua, City of Philadelphia, Citizens Electric, Columbia, CLS, PUC Consumer Advisory Council (CAC), Duquesne, Earthjustice, EAP, FirstEnergy, McNees Wallace & Nurick LLC, MCR Performance Solutions, NFG, OCA, Oracle Energy & Water, PAWC,

PA-CLEEC, PULP (on behalf of CAUSE-PA and Pittsburgh United), PECO, Peoples, PGW, Philadelphia Water Department, PWSA, PPL, UGI, Valley Energy, and Wellsboro Electric.

The SCA Subgroup met three times virtually or in-person from October 2023 through December 2023.[15] Following each meeting, participants were provided meeting notes to review and provide corrections, if needed.

The first meeting focused on questions developed based on comments to the March 27 Secretarial Letter related to statewide CAP administration. Issues addressed in these questions included:

- The potential duties and responsibilities of a statewide CAP administrator
- Potential efficiencies and cost-effectiveness benefits
- Entities best equipped to act as the statewide CAP administrator (*i.e.*, Public Utility, Third-Party/CBO, or State Agency)
- Barriers of transitioning to a statewide CAP

At the second and third meetings, the SCA Subgroup examined three different potential models for statewide CAP administration developed with the assumption that the CAF and universal service website will be in place. The three statewide administration models are as follows:

Model 1

- A state agency or third-party would be the central point of contact.

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[15] The SCA Subgroup met on 10/30/23, 11/28/23, and 12/14/23.

- Customers are automatically enrolled into a statewide Percent of Payment Plan (PIPP) through a Centralized Enrollment System (CES) that connects to the public utility's data system. CES would be similar to a COMPASS-like system with applications through a central portal.

- Public utilities would no longer administer CAPs. CES would handle the public utility-specific requirements and facilitate that processing on behalf of the public utility.

- CES would be funded through the General Fund by taxpayers.

Model 2

- Public utilities are the central point of contact with customers.

- A state agency or third-party administers the CES and transmits customer referrals (income information validated via CES) to the public utilities for enrollment (validated via CES). The state agency/third-party does not have access to customer account information.

- Public utilities continue to enroll the customer in the most advantageous and affordable payment option.

- Public utilities maintain USECPs and provide outreach, education, technical assistance (applications), and referrals to other programs.

- Costs continue to be recovered from ratepayers through individual public utility residential tariffs.

Model 3[16] (*See* Appendix A)

- An independent branch of BCS would serve as the administrator with dedicated staff to administer and manage the CES.
- The administrator would accept and process applications and determine an applicant's eligibility for CAP.
- Public utilities would be responsible to enroll customers into CAP after receiving verification from the administrator that the customer meets income qualifications.
- The administrator would be responsible for recertifying customers for CAP.
- Public utilities would maintain individual USECPs and CAP designs (*e.g.*, PIPP, rate discount, % of bill, etc.) with oversight provided by the PUC.
- MOU between the Statewide Administrator and the public utilities to permit the public utilities to access the CES.
- Public utilities would retain the ability to enroll customers in CAP and provide customers with referral, education, and outreach.

The recommendations and feedback of the SCA Subgroup are summarized below based on their review of these questions and models. Unless otherwise indicated, these recommendations reflect the general consensus of the SCA Subgroup (*i.e.*, proposals that were either supported or not opposed by SCA participants at the meetings).

Recommendations of the SCA Subgroup

The SCA Subgroup did not reach consensus on whether the PUC should transition to statewide CAP administration. There is disagreement related to whether a statewide

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[16] Members of several SCA Subgroup organizations (CLS, EAP, OCA, PAWC and PULP) met independently as a subcommittee and developed Model 3 to combine aspects of Models 1 and 2, with the goal that Model 3 would accomplish a centralized approach but not a duplication of processes.

CAP administrator would result in cost benefits to the jurisdictional public utilities and ratepayers. Some participants noted that a statewide CAP administration would result in benefits to customers, while others question whether public utilities would see cost benefits or be able to streamline staff and argue that it may create cost redundancies. A few participants mentioned that streamlining functionality at the front end would reduce respective staff workload, decrease staff capacity needs, and result in efficiencies in program procedures and costs. Others noted that while streamlining may produce efficiencies, without wholesale administrative takeover public utilities will still be providing some administrative services for these programs which would be redundant. Some participants also noted that the primary focus should be on DHS' data sharing followed by the CAF with the longer-term goals being the implementation of a universal service website and statewide CAP administration.

Proposed Statewide CAP Administration Model

If the PUC chooses to transition to statewide CAP administration, the SCA Subgroup recommends that the PUC consider an administration consistent with Model 3 (*see* Appendix A), with consideration given to the following:

- The statewide CAP administrator should be a state agency (independent bureau in the PUC) or third-party entity (via Request for Proposal (RFP) process) rather than a one public utility.
- The PUC should establish a common application and statewide website before implementing statewide CAP administration.
- Transitioning to statewide CAP administration should occur in increments over time.

- Public utilities should maintain the ability to enroll customers through multiple options and retain the role of providing customer education and outreach.
- A statewide CAP administration model should eliminate the need for customers to submit multiple applications and should simplify how to apply for public utility assistance.

Areas of non-consensus related to a preferred model of a statewide CAP administrator included:

- Whether a third-party entity would be appropriate to serve in the role of the CAP administrator. Participants noted that if a third-party is the administrator, stringent safeguards would need to be determined, including metrics for processes and performance, communication and contract requirements, the use of an advisory group, and it would have to be evaluated through an RFP process.
- Whether DHS could serve as an appropriate CAP administrator.
- How the PUC should fund statewide CAP administration. Some participants noted that by spreading the total CAP benefit costs among all public utility ratepayers, may avoid ratepayers of certain counties from disproportionately paying for increased costs compared to others, as some counties have higher than average poverty rates than others.

Actions/Decisions needed from the PUC

The SCA Subgroup also identified areas for the PUC to address before implementing statewide CAP administration, including:

- A common application and statewide website.

- A streamlined application process and two-way data portal.

- A process for customers to appeal adverse decisions on income eligibility.

- Processing parameters, including timelines for determining income eligibility, how public utilities will be notified of processed applications, and timeline for enrollment.

- A process for the administrator to ensure customers who verify as low-income are identified as confirmed low-income customers by their public utilities.

- Whether statewide CAP administration should include CAP or CAP-like programs offered by smaller EDCs/NGDCs and water/wastewater utilities.

- Whether costs related to a statewide CAP administrator should be considered administrative funding rather than program funding and whether the CAP funding mechanism would need to change.

- CAP benefit costs charged to public utility ratepayers need to be taken into consideration if the goal is to increase CAP participation dramatically.

- If administered by a third-party entity, whether an MOU between the third-party entity and the PUC would be necessary.

Appendix A: Model 3 – Statewide CAP Administrator

NOTE:
"Gray" highlight identifies points of disagreement among the SCA Subgroup.
"Yellow" highlight identifies points for further discussion with the PUC.

<u>CAP Administrator</u>

It appears that there is consensus that Model 3 should fall between Models 1 and 2 provided by the Commission (e.g., One statewide Centralized Enrollment System administered by state agency that coordinates with individual public utilities).

– What is the role of a Statewide CAP Administrator?

- Verifying income and household composition data, and transmitting to public utilities
  - Public utilities would be responsible to enroll customers after receiving customer referrals and initial verification that customer meets income qualifications.
  - Under this approach, public utility staffing may result in streamlining and administrative efficiencies, and there would be a dedicated staff to administer and manage the centralized system.
    - A streamlined application process should also be utilized to create a repository for submission to public utilities to ease enrollment. This repository should allow for public utilities/the centralized administrator to go back to this information for review as needed.
    - Point of coordination for the Website Subgroup related to the streamlined application, and the need for a secure 2-way data portal. Issues related to timeframes for data retention are also important to discuss across Subgroups Groups.
  - Public utilities would maintain USECPs.

- Who would serve as the Administrator?

- An *independent* branch of BCS would be appropriate to serve in this role.
- An individual public utility would not be appropriate to serve in this role.
- Point of Disagreement: Whether a third-party may be an appropriate Administrator?
    o Some subgroup members noted that this should be a possibility, as some third-party Administrators are still in place. However, other subgroup members raised serious concerns about a third-party serving in this role.
- Discussion for full group:
    o Whether DHS can serve as an appropriate administrator? – DHS would need to verify if they have this capacity and ability.
    o If a third-party is selected - stringent safeguards should be determined, including metrics to determine processes and performance, communication and contract requirements, and the use of an advisory group. An RFP process should also be evaluated to select any third-party for this role.
    o If the Administrator is housed within the PUC, there are overlapping considerations being discussed in the Website Subgroup re: whether there would be an assessment as general PUC budget.

– Who would be responsible for consumer education, tech assistance and outreach?

- Public utilities would retain role of consumer referral, education, and outreach.
- Administrator would be responsible for verifying income and customer communications regarding income verification.
    ○ A common administrator for income verification would communicate with the applicant if they have questions or need follow up.
    ○ *See also, below*, additional communications that would be conducted under this approach by the State Administrator.
- For any other issues, other than submission of income documentation or information re: household comp, public utilities would be responsible.
    ○ Recertification – if recertification timelines and associated processes are standardized, customers can be put on the same timeline to create efficiencies. This may require Plan adjustments.
    ○ Question for Common Application and Website Subgroups – re: technical assistance: If there is a common application, to what extent will there be back-end assistance for tech issues?

- ○ <mark>Question for further discussion: What is the appeal process for adverse decisions on income eligibility? – *e.g.*, informal complaint process.</mark>

– **What can be standardized to aid this approach?**

- Income documentation requirements
  - ○ List of acceptable forms of documentation/information by income sources.
  - ○ Income inclusions / exclusions (*e.g.*, earned/unearned child income).
  - ○ Zero-income form – use Commission-developed form.
- Timeline and Process for Income Verification / Recertification
  - ○ The goal of standardization should be to build in reasonable standards for income information requirements – for example, it is important to consider whether 30 days and/or 12 months of income information is acceptable, as currently provided for by some public utilities' USECPs (*e.g.*, PECO).
    - ■ Many public utilities may already have close to standardized timelines and processes related to Verification and Recertification, though for those who do not, the respective USECPs may need to be amended to reflect any standardization or change in timelines.
    - ■ Consistency in these areas will aid in logistics on the customer side to help ease enrollment and recertification.
  - o <mark>Point of Further Discussion: How to standardize a process so that low-income customers identified through the State Administrator are identified as confirmed low-income customers of public utilities. (Whether additional process is required on public utilities part to effectuate CLI classification from State Administrator data).</mark>
  - ○ Point of Disagreement: While there is general agreement that these processes will create efficiencies for customers, there is disagreement amongst subgroup members about the extent efficiencies will be created on the public utility side. For example, a point of concern is the back-office staff and their particular functions. *See below*.
- Customer Notices
  - ○ Notices of incomplete application.
  - ○ Notices of rejection.
  - ○ Notices that completed applications are shared with a specified public utility with instructions on how to contact public utilities to ensure enrollment.
  - ○ Program rights and responsibilities, including process for seeking review of an adverse decision.

CAP Design

– Would public utilities continue to administer their respective CAP plans?

- Yes – maintain CAP plans and structures (*e.g.*, PIPP, rate discount, percent of bill, etc.)
- Common Administrator would be responsible for verification and recertification of income / [household] size, and communications necessary to facilitate verification.

Intake Processes and Procedures

- There is general consensus that a common application and statewide website should be utilized under this model.
- Under this approach, public utilities would still be able to have customer conversations and interaction re: assistance enrollment processes. This is especially true where situations arise where other programs (*e.g.*, payment arrangements) would be more financially advantageous (a "good two-way street").
- If someone calls the public utility rather than the State Administrator, there should be a warm transfer option.
  - o In the case of vulnerable customers, additional assistance through coordination with CARES may be warranted, and processes of warm transfer should account for this.
  - o Central Administrator should have tools to assist special needs customers who may need additional assistance to complete applications and submit documentation.

– What can be standardized to aid in this process?

- Income documentation and information required.
- Use of a common application and statewide website (other Subgroups).
- Customer notices and information / process and timing for communications including communications related to adverse determinations.

Verification Processes and Procedures

– Under this approach, who ultimately enrolls the customer in an assistance program?

- There appears to be a level of consensus that public utilities would be responsible for enrollment under a Model 3.

- Centralized Enrollment System verifies income eligibility and sends customer's information to individual public utility to enroll applicants into the most affordable payment option.
- For a statewide CAP administration system, there would likely need to be new outbound processes and procedures set by the public utilities.
- It is also important to determine and minimize any additional "gap period" in enrollment through coordination with a statewide CAP administration system.

  - Points of Consideration for further Discussion: Timelines for determining income eligibility and ultimate enrollment timeframes once information Notice processes from State Administrator to public utilities when an application is submitted – and how this can trigger protection from termination.

<u>Oversight</u>

– Under this approach, for what level of oversight would the State Administrator be responsible?

- Public utilities will retain their USECPs, with oversight provided by the PUC, as is currently required.
  - Decisions re: data storage, maintenance, coordination of income and household comp. documentation/information should be made by the PUC prior to any establishment of a Statewide Administrator. The Administrator should be an executor of the decision made by the Commission, who should retain **<u>full and transparent</u>** regulatory oversight of these programs – with robust public participation.
- Complaint processes/coordination – if the issue with the application is technical and related to the State Administrator's functions (*i.e.*, income determinations/documentations), then the issue may be resolved by the Administrator. HOWEVER, public utilities would still need to be able to take in issues and complaints (*i.e.*, a "both ways" approach).
  - Under this approach, the Administrator would be responsible for a certain level of oversight related to their required functions, as described above.
- Per BCS's recommendation [Model 2]: MOU between the Statewide Administrator and the public utilities would need to be executed in order to permit the public utilities to access to the Centralized Enrollment System. This must contain strong privacy protection and be subject to PUC review and public input.

<u>Funding Mechanism</u>

- The report from the SCA Subgroup should not reach legal conclusions regarding questions of funding.
- There are broad concerns that public utilities and low-income customers in need of assistance are not reliant on general funding because it jeopardizes programs and program access.
- Point for further investigation and discussion with the full USWG and Commission: Whether funding under this approach can be considered administrative funding rather than program funding? Whether the funding mechanism would need to change, especially if considered administrative costs rather than program costs?
- If costs become part of the PUC's budget, there should be transparent reporting processes for the legislature.

<u>BENEFITS OF A STATEWIDE CAP ADMINISTRATOR</u>

Point of Disagreement: There is general agreement amongst subgroup members that a State CAP Administrator would result in benefits to customers. However, there is a disagreement related to whether a State Administrator would result in cost benefits to the jurisdictional public utilities and, ultimately, ratepayers. Some subgroup members question whether public utilities would see cost benefits or be able to streamline staff, and argue it may create cost redundancies. Other subgroup members expressed that streamlining functionality at the front end would reduce respective staff workload, decrease staff capacity needs, and ultimately result in efficiencies in procedures and costs. Further, it was noted that moving towards a State CAP Administrator would eliminate siloing where customers have to submit multiple applications, and would simplify outreach and education about where and how to apply for public utility assistance.

<u>Other Considerations</u>

The SCA Subgroup report should not reach any legal conclusions related to required legislative authority.

DHS Data Sharing Subgroup Report

Summary of the DHS LIHEAP Data Sharing Process

At the initial November 2, 2023 meeting, DHS provided information regarding its preparations for the LIHEAP data sharing process. DHS is including the following language on its LIHEAP application for the 2024-2025 program year to obtain consent from LIHEAP participants to share information and data with public utilities:

> Many Pennsylvania electric and gas utilities operate utility assistance programs to help low-income customers afford the cost of utilities. DHS can share your information with your utilities to help you enroll. Information will be kept confidential. You can get a LIHEAP grant even if you do not want DHS to share your information.
>
> ___I allow DHS to share my income and household information with my utilities to help enroll me in a utility assistance program. I understand that my utility may need to contact me for additional information before I am enrolled in a utility assistance program.

DHS is developing a systematic process where its eligibility system will generate a weekly report for a public utility to access the information on SeGOV.[17] The reports uploaded to SeGOV will have the following data points:

- Name of public utility account holder.
- Name of all household members, regardless of the household member's eligibility for LIHEAP.
- Income (annual or monthly) for each household member.
- Source of income for each household member.

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[17] The SeGOV training PowerPoint and the SeGov user manual can be accessed at https://www.dhs.pa.gov/providers/Providers/Pages/LIHEAP-Vendors.aspx.

- Date income was verified.

- Service address.

- Account number (or other unique identifier) for head of household.

- Age or date of birth of each household member (Universal Service Reporting Requirement).

- Telephone number.

- Email address.

If consent is given, the data of applicants who qualify for LIHEAP will be shared with the public utility who receives the grant. A public utility will need to opt-in by signing the data sharing agreement to receive the information. At the time of the stakeholder meetings, DHS was still finalizing the data sharing agreements with a plan to implement technology changes for data sharing in September 2024. DHS will include training on data sharing in its annual LIHEAP training for DHS and CAO employees. DHS is also considering adding language about the LIHEAP data sharing to its brochures.

Relevant Comments to the March 27 Secretarial Letter

In the March 27 Secretarial Letter, the PUC asked stakeholders to comment on questions related to consumer education and outreach, consumer consent for sharing information, and the feasibility of automatic enrollment. March 27 Secretarial Letter at 3, Questions #3, #4, and #7. These topics were discussed by the DHS Data Sharing Subgroup. Comments received on these questions are summarized below.

WHAT ADDITIONAL CONSUMER EDUCATION AND OUTREACH COULD BE UNDERTAKEN TO MAKE MORE LOW-INCOME CONSUMERS AWARE OF THE BENEFITS THAT MAY BE AVAILABLE TO THEM?

Commenters provided the following recommendations on ways to enhance universal service education and outreach:

- Establish/encourage joint outreach campaigns across public utilities and between the PUC, public utilities, DHS, and the General Assembly. EAP Comments at 13-14; Duquesne Comments at 8; Columbia Comments at 9; FirstEnergy Comments at 10; PWSA Comments at 3-4.

- Encourage electric, natural gas, and water/wastewater public utilities with overlapping or neighboring service territories to improve outreach efficiency by conducting joint consumer education materials and advertising. Columbia Comments at 9; Peoples Comments at 7.

- Address barriers to customer participation in program descriptions and outreach. These barriers include uncertainty about eligibility, the application process, and program value; the amount of information/documentation needed to enroll; and distrust in institutions and/or low-income programs.[18] Kleeman, *et al*.

- Use positive, engaging, and proactive communications that are as personalized to each customer as possible. Opower Comments at 3-5.

- Use text messaging and outbound automated calling. PWSA Comments at 3-4.

- Distribute fliers, with QR codes linked to websites about local public utility CAPs, to community assistance centers (*e.g.*, food banks). NAWC Comments at 7-8.

- Use community centers, instead of call centers, as a means of identifying eligible customers. OCA Comments at 18.

- Focus on relationship-building in the community. OCA Comments at 18.

- Visit customers where they live/work/shop/play/pray and allow two-way communication between a public utility and the customer. OCA Comments at 18.

- Work with "trusted messengers" within a community. OCA Comments at 18.

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[18] *Effects of redesigning the communication of low-income residential energy efficiency programs in the U.S. Energy Policy*, https://doi.org/10.1016/j.enpol.2023.113568 (last accessed February 15, 2024).

- Establish a Public Partnership Outreach Plan to work with administrators of similar means-tested programs to ask customers if they want their eligibility information shared with public utilities to establish the customer as a confirmed low-income customer with winter shutoff protections and to receive information about CAP. OCA Comments at 19.

- Require a public utility to implement assessment measures for outreach activities using metrics, mapping tools, and benchmarks. Utility Justice Advocates Comments at 32-35.

- Increase coordination with state and local agencies. Utility Justice Advocates Comments at 32-35.

- Require evaluation for eligibility in universal service programs before involuntary termination of public utility service. Utility Justice Advocates Comments at 32-35.

- Use improved data and analytics to identify customers in need. Opower Comments at 3-5.

- Conduct proactive outreach to customers before they experience a crisis. Opower Comments at 3-5.

HOW CAN CONSUMER CONSENT BE BUILT INTO THE INTAKE PROCESS THAT PERMITS THE PUBLIC UTILITY DOING THE INTAKE TO PROVIDE THE ENROLLMENT INFORMATION TO THE OTHER PUBLIC UTILITIES SERVING THE CONSUMER?

The comments indicate that there is consensus that customer consent should be obtained through a checkbox on an application with an explanation of how the information will be used. For example, *see* Duquesne Comments at 6. Many commenters asserted that the LIHEAP Data Sharing process, which will use a checkbox on the LIHEAP application to obtain customer consent to share income and household information with public utilities for the sole purpose of enrolling in universal service programs, should serve as a model for obtaining customer consent for information

sharing between public utilities. For example, *see* EAP Comments at 8-9. Some public utilities recommended that the PUC allow customers to verbally consent to information sharing on a recorded phone line. Peoples Comments at 3-4; Aqua Comments at 4.

PGW averred that customer consent for automatic enrollment in another public utility's program should be obtained in writing to ensure that the customer is making a conscious and informed decision. PGW Comments at 5. Commenters also expressed interest in ensuring that the public utilities which participate in the information sharing ensure customer confidentiality and privacy protections as well as address cybersecurity threats that could be barriers to the process. PPL Comments at 6; Columbia Comments at 6; Utility Justice Advocates Comments at 16-17. Overall, the commenters supported the PUC adopting standardized customer consent language to be developed through the working group. PECO Comments at 8; FirstEnergy Comments at 6; Utility Justice Advocates Comments at 18-19. Specifically, it was suggested that the PUC develop (1) minimum procedural requirements for informed consent, (2) restrictions on the scope of the content and use of the data, and (3) prohibit sharing information related to domestic violence status, medical conditions, or medical usage. Utility Justice Advocates Comments at 17; 19-20.

IS AN AUTOMATIC ENROLLMENT PROGRAM FEASIBLE WHERE ANY MECHANISM THROUGH WHICH AN ELECTRONIC EXCHANGE OF INFORMATION BETWEEN A PUBLIC UTILITY AND A STATE SOCIAL SERVICE AGENCY CONFIRMS THE ELIGIBILITY OF PUBLIC BENEFITS WHETHER OR NOT THE INFORMATION IS EXPRESSLY AUTHORIZED BY THE HOUSEHOLD? IF EXPRESS AUTHORIZATION IS NEEDED, RATHER THAN AUTOMATIC ENROLLMENT, CAN THAT EXPRESS AUTHORIZATION BE PROVIDED ONE TIME IN A UNIFORM APPLICATION RATHER THAN ON A UTILITY-BY-UTILITY BASIS USING SEPARATE APPLICATIONS?

A number of commenters opposed automatically enrolling customers into CAP without their informed consent and asserted that customers must first be made aware of the benefits, rules, and responsibilities of the program. EAP Comments at 9; PPL Comments at 6; Aqua Comments at 4; Duquesne Comments at 6-7; Columbia Comments

at 6-7. Several commenters also strongly support expedited program enrollment if all eligibility information has been provided, without requiring a new application or additional documentation, and the customers have given their informed consent. FirstEnergy Comments at 7; Aqua Comments at 4-5; PWSA Comments at 2.

Commenter concerns with automatic enrollment included the following: (1) not all low-income customers are payment troubled or want to enroll in CAPs; (2) CAPs are most effective when a customer is well-informed of the benefits and obligations associated with participation prior to enrollment; (3) automatic enrollment of low-income qualified households would significantly increase the cost of CAPs recovered from ratepayers; and (4) customers might object to changes or restrictions on their account that they did not agree to (*e.g.*, unable to shop for a supplier). EAP Comments at 9-10; PPL Comments at 6-7; Duquesne Comments at 6-7; Columbia Comments at 6-7; FirstEnergy Comments at 6-7; OCA Comments at 11-12.

OCA, Peoples, and the Utility Justice Advocates support establishing an automatic enrollment process for CAPs. OCA Comments at 9-10; Peoples Comments at 4-5; Utility Justice Advocates Comments at 21-22. OCA noted there are benefits to automatic enrollment, which include the following: (1) removing barriers keeping eligible customers from receiving the help they need; (2) the ability to use the LIHEAP data sharing process information to allow public utilities to automatically enroll customers into CAP at the appropriate discount tier; and (3) the opportunity to expand the process to enroll all recipients of means-tested benefits into CAPs. OCA Comments at 9-10.

OCA and Peoples recommended asking customers to consent to automatic CAP enrollment on LIHEAP and other assistance applications and then, after enrollment, having the public utility send them a communication explaining the program and how they can opt-out. OCA Comments at 10; Peoples Comments at 4-5. OCA recommended that the PUC direct public utilities to allow customers to retain their right to obtain future

CAP arrearage forgiveness and a payment arrangement under 66 Pa. C.S. § 1405 if they disenroll within 90-120 days. OCA Comments at 10.

Data Sharing Subgroup[19]

The Data Sharing Subgroup was formed to provide recommendations and feedback on the fourth USWG objective in the PUC's August 22 Secretarial Letter: "Prepare for the data sharing by the [DHS] anticipated on or about the summer of 2024." August 22 Secretarial Letter at 1.

A total of 67 individuals registered to participate in the Data Sharing Subgroup, representing a diverse group from the following organizations: Broadband Communications Association of PA, Aqua, City of Philadelphia, Citizens Electric, Columbia, CAC, CLS, DHS, Duquesne, EAP, FirstEnergy, KEEA, MCR Performance Solutions, NFG, OCA, Oracle Energy & Water, PA-CLEEC, PAWC, , PECO, Peoples, PGW, Philadelphia Water Department, PWSA, PPL, PULP (on behalf of CAUSE-PA and Pittsburgh United), UGI, Valley Energy, and Wellsboro Electric.

The Data Sharing Subgroup had virtual meetings on November 2, 2023, November 30, 2023, and January 4, 2024, and a hybrid meeting on December 14, 2023. At the November 2, 2023 meeting, DHS presented the implementation plan for the LIHEAP data sharing process and answered questions from the Data Sharing Subgroup. The Data Sharing Subgroup also had a general discussion regarding consumer education and outreach as well as the need for modifications to USECPs. At this meeting, a

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[19] LAC has worked on data sharing issues for over six years and is also currently looking at the data sharing process from DHS' perspective.

subcommittee was established to work on some of the specific issues identified by the stakeholders.[20]

At the meeting on November 30, 2023, the subcommittee presented the draft policy framework for LIHEAP data use as well as LIHEAP application educational materials, and the Data Sharing Subgroup members were given an opportunity to comment on the proposed materials.

On December 14, 2023, the full working group met in person and via TEAMS. All working group members were given an opportunity to comment on the Data Sharing Subgroup draft policy framework and educational materials.

At the final meeting on January 4, 2024, the subcommittee presented additions to the policy framework, including guidance on auto-enrollment of returning CAP participants, competitive shopping, and pre-program arrearages. The Data Sharing Subgroup members were given an opportunity to comment on the additional material.

Recommendations of the Data Sharing Subgroup

Overall, the Data Sharing Subgroup reached broad consensus that further PUC guidance would be helpful to prepare public utilities for the effective use of LIHEAP participant data. The subcommittee provided guidance on areas of consensus and non-consensus on the following topics:

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[20] The subcommittee consisted of Data Sharing Subgroup members from CLS, Columbia, Duquesne, EAP, Essential Utilities (Aqua/Peoples), FirstEnergy, OCA, PGW, PPL, and PULP.

Areas of Consensus:

- Educating customers regarding the LIHEAP application
- Use of LIHEAP data

Areas of Non-Consensus:

- Public utility participation in DHS LIHEAP data sharing process
- Auto-enrollment

Educating customers regarding the LIHEAP application checkbox

The Data Sharing Subgroup recommends that the PUC develop - in collaboration with DHS, where possible - educational material to inform consumers about the purpose and effect of the data sharing checkbox, for utilization by public utilities, universal service program administrators, and other stakeholders. The Data Sharing Subgroup submitted proposed educational language. *See* Appendix A. The Data Sharing Subgroup recommends including this educational material in bill inserts, on-bill messaging, communications with CAP/CAO administrators, the CAF, and on public utility/PUC/stakeholder websites.

Public utility participation in DHS LIHEAP data sharing process

The Data Sharing Subgroup recommends the PUC should require a public utility that elects to participate in LIHEAP data sharing program to file a letter with the PUC at the public utility's currently approved USECP docket and any pending USECP docket(s) indicating that the public utility has signed the DHS data sharing agreement and identifying how the public utility plans to use the data.

There was no consensus on whether the PUC should require a public utility to participate in the DHS Data Sharing program and/or sign the DHS data sharing agreement. Some Data Sharing Subgroup members were concerned that the terms and conditions of the data sharing program may change year-to-year. Other Data Sharing Subgroup members believed that participation should be mandatory for a public utility operating a universal service program(s).

Use of LIHEAP data

The Data Sharing Subgroup recommends that the PUC issue guidance, establishing parameters for when, how, and under what circumstances a public utility may use the LIHEAP data. There is broad agreement among the Data Sharing Subgroup that LIHEAP data should only be used for the singular purpose of streamlining outreach and enrollment and the recertification of LIHEAP recipients into the public utility's low-income assistance programs. As such, the Data Sharing Subgroup recommends that the PUC explicitly affirm that a public utility may only use the LIHEAP data for outreach/enrollment/recertification in public utility-run universal service programs and that the PUC prohibit a public utility from using LIHEAP data for any other purpose (consistent with the terms of the DHS data sharing agreement). The Data Sharing Subgroup also recommends that the PUC clarify that its guidance is not intended to abrogate the terms and conditions of DHS's data sharing agreement.

The Data Sharing Subgroup identified four primary areas where a public utility could use LIHEAP data:

(1)   Individualized outreach and simplified/streamlined CAP enrollment
(2)   CAP auto-recertification

(3)   CAP auto-enrollment

(4)   Verification of income and household composition for LIURP and Hardship Fund Programs

There was consensus by the Subgroup that the PUC should issue an order establishing standard guidelines for a public utility to follow if/when implementing a process to use LIHEAP data for each of the four identified purposes, detailed below.

Individualized Outreach And Simplified/Streamlined Enrollment

The Data Sharing Subgroup did not reach consensus on whether the PUC should encourage or require a public utility that participates in the LIHEAP data sharing program to perform targeted outreach to LIHEAP recipients that are not actively enrolled in CAP. If the PUC requires targeted outreach, the Data Sharing Subgroup generally agrees that a public utility should use LIHEAP data to conduct outreach as soon as possible, ideally monthly, after receiving customer data from DHS. The Data Sharing Subgroup recommends that a public utility have some flexibility to stagger outreach if it receives a large group of new potential CAP enrollees. The Data Sharing Subgroup also believes that the outreach should include a simplified/streamlined process for the household to enroll in CAP without further paperwork. The Data Sharing Subgroup recommends that the PUC develop templates, in English and Spanish, for public utilities to use for this purpose.

While there was no consensus on the form of outreach, the Data Sharing Subgroup discussed various methods of communication including letters, phone calls, emails, and/or text messages.

The Data Sharing Subgroup recommends that the PUC issue express guidance permitting a public utility to use the LIHEAP data received from DHS in the prior 12 months and/or the current or prior LIHEAP program year to enroll the LIHEAP recipient without further paperwork. The Data Sharing Subgroup did not reach consensus as to whether the PUC guidance should encourage or require a public utility to send follow-up communication informing newly enrolled participants that they have been enrolled in CAP based on LIHEAP data and requesting that the participant contact the public utility if the household income has changed since receiving the LIHEAP grant.

After a public utility files a letter with the PUC at the public utility's currently approved USECP docket and any pending USECP docket(s) indicating that the public utility has signed the DHS data sharing agreement, the Data Sharing Subgroup does not believe that any further PUC approval is necessary for a public utility to use LIHEAP data for individualized CAP outreach and simplified/streamlined CAP enrollment. However, the Data Sharing Subgroup did not reach consensus as to whether the PUC should encourage or require a public utility to discuss plans for individualized outreach and enrollment with its respective Universal Service Advisory Group/Committee (USAG/USAC) and to share draft communications with those stakeholder groups.

CAP Auto-Recertification

The Data Sharing Subgroup recommends that the PUC issue an order setting forth guidance for a public utility to use LIHEAP data for CAP auto-recertification. The Subgroup recommends that the PUC:

- Issue express guidance clarifying that the LIHEAP income and household data received from DHS in the prior 12 months and/or current or prior LIHEAP program year is sufficient to meet the PUC's triennial recertification

requirement for LIHEAP participants pursuant to 52 Pa. Code § 69.265(8)(viii) (relating to CAP design elements) without further paperwork.

- Require a public utility participating in the data sharing program to cross reference with LIHEAP data for the prior 12 months or prior LIHEAP program year and recertify identified households with no additional action needed on the part of the customer.

- Require a public utility to send a communication to the auto-recertified customer with an updated CAP amount (if applicable) and directions to contact the public utility to provide additional updates on income/family size if their information has changed since completing the LIHEAP application.

Some Subgroup members expressed the need to include an explanation in the educational material that the income update may alter the customer's PIPP/asked to pay amount. There is a possibility that a customer's PIPP will increase as a result of the new income information from DHS.

CAP Auto-Enrollment

The Data sharing Subgroup did not reach consensus on whether auto-enrollment should be permissive or mandatory and believes that further consideration may be needed regarding the issue of cost and to work to identify a standardized methodology for projecting anticipated costs.

The Data Sharing Subgroup identified that there are different and/or additional considerations necessary for auto-enrollment of new and returning CAP participants.

The Data Sharing Subgroup recommends that the PUC issue an order setting forth standardized guidance for how LIHEAP data may be used to facilitate auto-enrollment

for new and returning CAP enrollees. The Data Sharing Subgroup recommends requiring a public utility to file a letter at its currently approved USECP docket and any pending USECP docket(s) indicating that it has a signed data sharing agreement and whether the data will be used for auto-enrollment for new and returning CAP customers consistent with PUC-established guidelines and how the data will be used In addition to the letter, the Data Sharing Subgroup recommends that the PUC require a public utility to file a petition which includes amended budget projections, identifies proposed process for auto-enrollment, identifies whether amendments to the public utility's USECP are necessary to facilitate auto-enrollment, and identifies whether the public utility vetted the process with its USAC/USAG and the position of potential parties, if known. The Data Sharing Subgroup asserted that such a petition would be subject to a 20-day answer period. If issues of material fact are identified in answers, the PUC should open the process to further review.

For *new* CAP participants, the Data Sharing Subgroup recommends that the PUC issue guidance permitting auto-enrollment of LIHEAP recipients that were not previously enrolled in CAP based on LIHEAP data. The Data Sharing Subgroup recommends that the PUC require a public utility to send customers who have not previously participated in its CAP an opt-out notice within 10 days of receiving LIHEAP data from DHS. The opt-out notice should include:

- An indication that the customer is eligible for CAP.
- An explanation of the benefits and program rules of CAP.
- Notice that, absent the customer opting out, the customer will be auto enrolled in CAP on XX date (30 days from receipt of the data).
- A requirement that a public utility send a welcome letter following auto-enrollment to explain the rights, obligations, and benefits of CAP.

The Data Sharing Subgroup further recommends that the PUC develop a plain-language template, in English and Spanish, for the opt-out notice and welcome letter.

For *returning* CAP participants, the Data Sharing Subgroup reminds the PUC that a household may have *in-CAP arrears* (also referred to as "in-program arrears" or "IPA") that must be resolved before a household can be reinstated into CAP. The Data Sharing Subgroup recommends that the PUC issue an overarching policy to guide auto-enrollment of returning CAP participants. The Subgroup recommends that the PUC direct a public utility to identify the types of returning CAP customers that would be ineligible for auto-enrollment (*e.g.*, voluntary withdrawals, removals) based on the public utility's other program rules. If the returning CAP participant's recently received LIHEAP grant is adequate to resolve prior in-CAP arrears, the household should be auto-enrolled pursuant to the guidelines and recommendations above for new CAP enrollees. If the LIHEAP grant was insufficient to resolve any past-due-in-CAP balances, the working recommends that the PUC guidance encourage the public utility to allow the LIHEAP recipient to be assessed for eligibility for a Hardship Fund grant. If LIHEAP and Hardship Fund grants, combined, would resolve the past-due-in-CAP balances and the public utility has sufficient hardship funding available, the Data Sharing Subgroup recommends that the LIHEAP recipient should be eligible for auto-enrollment consistent with the guidelines and recommendations above for new CAP enrollees.

The Data Sharing Subgroup suggests that, if LIHEAP and Hardship Funds are insufficient, a public utility should send a letter to the customer indicating that the household may be eligible to re-enroll in the program, identifying the balance that must be paid to be reinstated in CAP, and explaining the process for the customer to be reinstated. The Data Sharing Subgroup discussed possible alternative payment arrangements for the purpose of re-enrollment when a household has an in-CAP balance that is preventing CAP reinstatement but did not reach consensus on this issue. Some Data Sharing Subgroup members encourage the PUC to issue guidance reminding public

utilities that they may issue CAP PARs. Some public utilities note that there may be other balance-due policy issues to address. The Data Sharing Subgroup believes that it would be beneficial to continue to work with DHS to discuss how and whether LIHEAP grants could be directed to address in-CAP arrears.

Regarding shopping with an EGS or an NGS, the Data Sharing Subgroup established that public utilities currently use different processes to ensure shopping customers can enroll in CAP without barriers. Some public utilities send a letter to applicants advising them that they are ineligible for CAP while shopping with a supplier and advising applicants that they need to contact their EGS or NGS to return to default service. Some public utilities have information on their applications that advises an applicant that, by enrolling in CAP, the applicant agrees that the household will be returned to default service. The Data Sharing Subgroup recommends that the PUC: (1) prohibit suppliers from charging an early termination or cancellation fee for customers seeking enrollment in CAP; and (2) require public utilities to include information in the opt-out notice, detailed above, that customers will be returned to default service if they do not "opt out" of auto-enrollment in CAP.

The Data Sharing Subgroup did not reach consensus on whether the PUC should issue guidance for how to address auto-enrollment of new CAP participants with little or no pre-program arrearages (PPA). Some Subgroup members believe the PUC should establish a policy clarifying that auto-enrolled CAP participants with little or no pre-program arrearages should remain eligible for future forgiveness. Other Data Sharing Subgroup members believe the PUC should defer to the PPA forgiveness procedures approved in each public utility's existing USECP which apply to CAP customers broadly. Despite this difference in opinions, the Data Sharing Subgroup agrees that CAP auto-enrollees and those who enroll in CAP via other means should be treated equally.

There is consensus by the Data Sharing Subgroup that it would be helpful to have model language regarding auto-enrollment for inclusion in public utility USECPs; however, the Data Sharing Subgroup felt that it was premature to develop model language for the USECPs before the PUC issues further policy guidelines.

Use of data for other Universal Service Programs

The Data Sharing Subgroup recommends that the PUC issue guidance for public utilities as to how to use LIHEAP data for enrollment in LIURP or Hardship Fund programs. The Data Sharing Subgroup recommends that the PUC issue guidance clarifying that LIHEAP income and household data received from DHS in the prior 12 months and/or the current or prior LIHEAP program year is sufficient to verify eligibility for LIURP and/or the Hardship Fund without further paperwork.

There was no consensus by the Data Sharing Subgroup as to whether the guidance should be issued in the form of a PUC order, policy statement, or Secretarial letter.

The Data Sharing Subgroup does not believe that any further PUC approval is necessary for a public utility to use LIHEAP data for customers seeking to participate in LIURP or receive a Hardship Fund grant. The Data Sharing Subgroup did not reach consensus on whether the PUC should encourage or require a public utility to discuss plans with its respective USAC/USAG and share draft communications with that group. The Data Sharing Subgroup recommends that the PUC require a public utility to file a letter at its currently approved USECP docket and any pending USECP docket(s) indicating that it has signed the data sharing agreement and, if so, whether the data will be used for enrollment in LIURP and Hardship Fund and how the data will be used.

The Data Sharing Subgroup subcommittee also drafted educational material to be used to inform consumers about the purpose and effect of the data sharing checkbox on the LIHEAP application to be used by public utilities, universal service program administrators, and other stakeholders. The subcommittee specifically identified the following potential uses for the educational information: inclusion in public utility bill inserts/on-bill messaging, share with CAOs/CAP administrators, include with common application, public utility/PUC/stakeholder websites. The draft educational material is attached to this report as Appendix A.

Overall, the Data Sharing Subgroup broadly agrees that it is important for the PUC to issue guidance directing public utilities on the use of the LIHEAP data. The Data Sharing Subgroup also broadly agrees that further education is needed to inform customers of the purpose and effect of the data sharing option on the LIHEAP application. The Data Sharing Subgroup agrees that further discussions with DHS may be necessary to maximize the use of the LIHEAP data by public utilities. The Data Sharing Subgroup identified that further discussions may also be needed regarding the issue of cost associated with auto-enrollment of CAP participants and to work to identify a standardized methodology for projecting anticipated costs. Finally, after the issuance of PUC guidance on LIHEAP data use, the Data Sharing Subgroup agrees that it would be helpful to create model language for public utility USECPs to facilitate auto-enrollment.

Appendix A: Proposed Language for Educational Material

LIHEAP applicants/recipients now have the option to share certain LIHEAP application information directly with public utilities to help you enroll in your utility's low-income programs. Your household may be eligible for a discount on your energy bill and/or additional benefits, including past debt forgiveness, through a public utility's low-income assistance program.

How to use the checkbox:

When filling out your LIHEAP application, you'll come across a checkbox with the following statement:

> ___I allow DHS to share my income and household information with my utilities to help enroll me in a utility assistance program. I understand that my utility may need to contact me for additional information before I am enrolled in a utility assistance program.

You have the choice to either check the box or leave the box unchecked. It's entirely up to you.

Why would you want to share your data with public utilities?

Sharing your LIHEAP data with public utilities can help qualify you for additional discounts through the low-income assistance programs offered by public utilities. The purpose of this program is to help you get enrolled in your utility's low-income assistance program faster and easier. It also helps ensure that you do not need to provide the same information multiple times.

Sharing your data may also help speed up the application process because you may not have to provide the same household income information again to enroll in the public utility program.

Allowing LIHEAP to share this data directly with your public utility could help you get enrolled in public utility assistance programs that can save you a significant amount of money.

What information is being shared?

The information that is being shared with public utilities includes:

* Name of utility account holder and all household members
* Service address
* Phone number
* Email address
* Income (amount and source) for all household members
* Age/Date of Birth for all household members

How will my data be used?

Public utilities will use your data to make it easier to verify your income and household information so you can enroll in their low-income programs, such as a customer assistance program, a utility-run weatherization program, or a hardship fund. They may also use your data to contact you about these programs.

Is my data safe?

Yes, your privacy matters. LIHEAP and public utilities are required to protect the confidentiality of your data. Your data will only be used for the specific purposes of outreach and/or determining eligibility for low-income programs provided by your public utility and will not be sold to third parties or used for any other purpose.

Can I opt out of data sharing?

Yes. You can opt out of data sharing by leaving the checkbox unchecked on the LIHEAP application. If you opt out of data sharing, it will <u>not</u> impact your LIHEAP application in any way. However, it may take longer to apply or recertify for other types of public utility assistance, such as your utility's customer assistance program.

If you have any questions about LIHEAP data sharing, you can contact your local county assistance office, public utility, or the Pennsylvania Office of Consumer Advocate.

Additional information:

You have the right to access and correct your data.

You can withdraw your consent to data share at any time.

PAPUC