

July 31, 2024

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

Please allow this letter to serve as notice that FirstEnergy Pennsylvania Electric Company (“FE PA”) intends to participate in the Department of Human Services (“DHS”) data sharing in compliance with the Pennsylvania Public Utility Commission’s Order dated June 13, 2024. Specifically, FE PA intends to utilize the Low Income Home Energy Assistance Program (“LIHEAP”) data provided by DHS to implement a simplified/streamlined process for households to enroll in universal service programs and to automatically recertify in its Pennsylvania Customer Assistance Program (“PCAP”). In order to accomplish this, FE PA plans to implement the following process:

- Upon receipt of the monthly file from DHS, FE PA will validate the data and add matching SAP data fields.
- If records are for existing PCAP participants, FE PA will process a recertification for that customer to update their household and income information and assign a new recertification date without requiring additional income information or documentation.
- For customers that are not PCAP participants, FE PA will trigger an automatic letter to encourage enrollment in PCAP and explain ways to apply. Customers may complete a streamlined application online or by calling Dollar Energy Fund.

- The modified file of LIHEAP data will be available to the pabillassist.com web application, which is used by Dollar Energy Fund to process PCAP applications as well as customers applying online. Income documentation will not be required unless the applicant indicates income has changed for a household member.
- When the LIHEAP data is successfully used to complete the PCAP application or automatically recertify income for an existing PCAP customer, a letter will be mailed to the customer to advise LIHEAP data was used to complete the application or recertify their income. The letter will also provide instructions on how to provide updates on household income/size if the household information has changed since completing the LIHEAP application.

Further, FE PA plans to utilize the LIHEAP data received to conduct individualized universal service outreach to customers not participating in PCAP by triggering an automatic letter to encourage enrollment and explain ways to apply for the program.

Additionally, beginning in September 2024, FE PA will provide educational materials to inform customers about the purpose and effect of the consent checkbox on the LIHEAP application which will grant DHS permission to share the data with FE PA. The following outreach materials are being modified to include this information:

- Very Important Programs, which is a bill insert that explains available payment assistance programs;
- Make Your Bills More Affordable, which is a bill insert that explains PCAP and WARM programs and how to apply;
- The corporate website firstenergycorp.com/billassist, which offers available program information, including LIHEAP;
- PA Program Assistance, which is a handout that explains how to apply for multiple programs and their benefits;
- PCAP Brochure, which is a handout that provides a PCAP overview;
- PCAP Enrollment letter, which confirms PCAP enrollment;
- PCAP mailer, which is a brochure mailed after enrollment or recertification that outlines program details;
- LIHEAP Data Share letter, which confirms we used their LIHEAP data to complete the application and they may continue to recertify via LIHEAP;
- Recertification letters, which advises the customer it is time to recertify income eligibility for PCAP; and

- Recertification confirmation letter, which is mailed to each auto-recertified PCAP participant based on LIHEAP data and explains their updated bill amount and instructions on how to contact FE PA to provide additional updates on household income and size if that information has changed since completing the LIHEAP application.

Regarding FE PA's current Universal Service Energy Conservation Plan ("USECP") for 2024 - 2028, the following items will need to be waived as italicized below:

The following practice of extending the recertification period by one-year as explained in the Recertification Requirements will be discontinued because LIHEAP participants will have eligibility confirmed via the LIHEAP data sharing process through automatic recertification.

- See USECP, page 16, Recertification Requirements: *In addition, when a customer receives LIHEAP benefits, the recertification period may be increased one year provided the recertification period does not exceed 3 years. Completion of a PCAP application is required at least every 3 years. This LIHEAP extension does not apply to customers identified as Zero-Income or participants that already have a 3-year recertification period.*

The requirement to provide proof of income documents will be waived for customers being recertified, or enrolled, based on LIHEAP household and income data. The application or recertification will be completed with the data provided by DHS. This does not alter the ability to take income information verbally for known LIHEAP recipients when DHS data is not available.

- See USECP, page 11, Intake Process: *During the initial call, customers may be asked to provide all household members' names, Social Security numbers ("SSN"), dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer.*

Additionally, the following items will need to be added to the USECP as italicized below:

- See USECP, page 11, Intake Process:
 - During the initial call, customers may be asked to provide all household members' names, Social Security numbers ("SSN"), dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer. *If the PCAP administrator can verify the customer shared their household and income data with FE PA via the PA LIHEAP application, the administrator may*

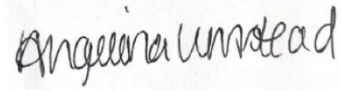
complete the application with the data if it was received for the current or prior program year. This data will be used for enrollment or to recertify program participants.

- See USECP, page 15, Recertification Requirements:
 - Recertification Requirements: Customers will be able to recertify over the telephone, online, by mail *or by giving consent on their LIHEAP application to share application data with the utility.*
 - To recertify, PCAP participants will be required to submit the required household income and household member information by U.S. mail, fax, or online, if applying online, *unless their household and income data has been received from Department of Human Services via the LIHEAP application data process in the current or prior program year.*

- See USECP, page 18, Consumer Education, Outreach and Referral:
 - As a PCAP participant, customers receive the following communications:
 - Enrollment letter
 - Recertification letter
 - Reminder recertification letter with form, if needed
 - *Recertification confirmation letter*
 - *LIHEAP data share confirmation letter, if needed*
 - Removal letter, if needed
 - Quarterly mailings with energy conservation information when participants' usage increased 25% compared to the prior year of service at the same location
 - Outbound calls are also completed as part of the recertification process
 - As a LIHEAP recipient that is not a PCAP participant, customers receive the following:
 - *Outreach letter to explain they may be eligible for PCAP and how to apply without providing additional documentation for household income*

Please feel free to reach out with any questions or concerns.

Very truly yours,

A handwritten signature in black ink that reads "Angelina Umstead". The signature is written in a cursive style and is positioned above the printed name.

Angelina Umstead

AU/dml

Enclosure

- c: As Per Certificate of Service
Joseph Magee, Bureau of Consumer Services (jmagee@pa.gov)
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2024-2028	:	M-2022-3036532
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West Penn Power Company Universal Service and Energy Conservation Plan for 2024-2028	:	M-2022-3036533
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Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2024-2028	:	M-2022-3036534
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Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2024-2028	:	M-2022-3036535
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CERTIFICATE OF SERVICE

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

Service by electronic mail only as follows:

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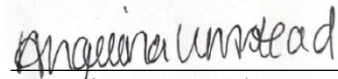
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Dated: July 31, 2024



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