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**VIA EFILE**

July 31, 2024

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

**RE: Letter of Intent to Participate in the Department of Human Services'  
(DHS) Data Sharing Program**

**PPL Electric Utilities Corporation's Universal Service and Energy  
Conservation Plan for 2023-2027**

**Docket No. M-2022-3031727**

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Dear Secretary Chiavetta:

PPL Electric Utilities submits this letter in response to the Pennsylvania Public Utility Commission's Order dated June 13, 2024, at Docket No. M-2023-3038944. Specifically, this letter responds to the below:

That an energy public utility choosing to participate in the LIHEAP (Low Income Home Energy Assistance Program) data sharing shall file and serve a letter, consistent with this Order, at its current and pending universal service and energy conservation plan docket(s).

PPL Electric Utilities, as indicated in the Order, will participate in in the DHS data sharing and herein addresses the following requirements of the Order:

If an energy public utility chooses to participate in DHS' LIHEAP data sharing, the energy public utility shall file and serve a letter at its current and pending USECP dockets no later than July 31, 2024, indicating it is participating in DHS data sharing and include clarification that the energy public utility will:

- Use the LIHEAP data to conduct individualized universal service outreach as soon as possible (ideally monthly) after receiving the household's data from DHS.
- Use a simplified/streamlined process for households to enroll in universal service programs and recertify in CAP (Customer Assistance Programs) if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, without requiring additional applications or documentation.

- Discuss its plans for individualized outreach and simplified/streamlined enrollment with its respective Universal Service Advisory Group/Committee.
- Send a communication to each auto-recertified CAP participant based on LIHEAP data with their updated CAP bill amount (if applicable) and instructions on how to contact the energy public utility to provide additional updates on household income/size if the household information has changed since completing the LIHEAP application.
- Provide educational materials to inform customers about the purpose and effect of the checkbox on the 2024-2025 LIHEAP application which will grant permission for DHS to share this information with energy public utilities. Include a timeline for when the materials will be provided to customers.
- Identify the provisions in the energy public utility's current and proposed USECP that need to be waived or added to incorporate the data sharing conditions described above.

The Company will review the data provided by DHS as soon as practical after receiving the monthly file. An additional evaluation of customer eligibility will be completed before conducting customer outreach. Customers excluded from outreach may include, but not be limited to those with final or pending-final accounts; on non-residential rate or TOU (time-of-use) rates, or with multiple PPL Electric service accounts, The Company will use a streamlined process to enroll eligible LIHEAP recipients in its Universal Service Programs (USPs) which will not require additional applications or proof of income. The Company does not intend to use the data to auto-enroll customers in our USPs. For enrollments, the Company plans to get customer permission before enrolling in any USP.

The Company will also use data provided by DHS to recertify existing participants in its CAP program without requiring additional applications or proof of income. Customers recertified through this path will receive notice of their new CAP payment amount as well as instructions on how to contact the Company to provide additional updates on household income/size if the household information has changed since completing the LIHEAP application.

The Company will discuss its plans for utilization of the DHS data, customer outreach, and streamlined enrollment and recertification processes with its Universal Service Advisory Committee (USAC) at its next meeting.

The Company will update its existing website LIHEAP page with additional information informing customers about the purpose and effect of the data sharing consent checkbox on the LIHEAP application, which grants permission for DHS to share the customer's information with energy public utilities. This additional information will be added to the site by the opening date of the 2024-2025 LIHEAP season.

The Company's current USECP includes the following with respect to CAP eligibility: "The household must submit a proof of income evidencing that they have a source of income or, alternatively, must submit the zero income form explaining their income situation."

The Company proposes to add the following to CAP eligibility: "Additionally, the Company will accept validated income provided by DHS as confirmation of eligibility."

The Company's current USECP also states: "Accounts that qualify for automatic recertification are those that have received LIHEAP funds within the past 12 months or have SSI as the primary source of income. Accounts that meet the automatic recertification criteria will be recertified for another 12 months in the program at the same OnTrack installment amount."

The Company proposes to add the following to CAP recertification: "In addition to the automated process, the Company will use income provided by DHS to recertify customers and calculate a new installment amount."

The chart below summarizes the Company's existing USECP language and proposed changes as referenced above.

ID	Category	Current Plan	Change
1	Eligibility	Household must submit proof of income or zero income form	Also accept validated income provided by DHS as confirmation of eligibility.
2	Recertification	The Company uses income information provided by the customer to recertify eligibility. LIHEAP or SSI recipients are automatically recertified one time with the same installment amount.	The Company will continue to automatically recertify LIHEAP or SSI recipients. In addition to the automated process, the Company will use income provided by DHS to recertify customers and calculate a new installment amount.

If you should have any questions, please do not hesitate to contact me at (484) 634-3209.

Respectfully submitted,

*/s/ Yvette Belfort*

Yvette Belfort  
Manager-Regulatory Programs/Business Services

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## CERTIFICATE OF SERVICE

(Docket No. M-2022-3031727)

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

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