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 Pennsylvania Public |  
 Utility Commission, | Docket Nos.:  
                   v. | R-2024-3046931  
 PECO Energy Company | R-2024-3046932  
                           |  
 Call-In Telephonic |  
Evidentiary Hearing

Pages 841 - 919

Judge's Chambers  
 State Office Building  
 801 Market Street  
 Philadelphia, PA

Monday, August 12, 2024  
 Commencing at 10:01 a.m.

INDEX TO EXHIBITS

Docket Nos. R-2024-3046931, R-2024-3046932

Hearing Date: August 12, 2024

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
PECO Hearing Exhibit 2	903	903
Excerpts of USP		
Reports		
PECO Hearing Exhibit 3	903	903
CAP Participation		

MEAF Denial Reasons



# Report on **2019** Universal Service Programs & Collections Performance

of the Pennsylvania  
Electric Distribution Companies &  
Natural Gas Distribution Companies

Pennsylvania Public Utility Commission  
Bureau of Consumer Services



## Customer Assistance Programs (CAPs)

The PUC monitors implementation of the Commission’s statute, regulations and CAP Policy Statement<sup>40</sup> by EDCs serving more than 60,000 customers and NGDCs serving more than 100,000 customers. The USRR requires the public utilities to report the number of customers enrolled in CAP. The Commission uses the number of participants enrolled in CAP at the end of the program year to quantify participation. Each public utility’s restructuring proceeding established a program phase-in enrollment size. Since then, each public utility submits a USECP for Commission approval and a third-party evaluation of its universal service programs. USECPs and Evaluations are posted on the Commission’s website (Appendix 4 contains viewing instructions).

### CAP Participation Rate

The **CAP participation rate** is defined as the number of participants enrolled as of Dec. 31, 2019, divided by the number of confirmed low-income customers served by the EDC or NGDC. The Commission expects a public utility to maintain open enrollment to meet the need in each public utility’s service territory. The CAP participation rate would be much lower if the rate reflected estimated low-income customers rather than confirmed low-income customers, as estimated customer numbers based on census data are much higher and less accurate.

### *CAP Participation – Electric Utilities – 2017-2019*

Utility	2017		2018		2019	
	Participants Enrolled as of 12/31/17	CAP Participant Rate	Participants Enrolled as of 12/31/18	CAP Participant Rate	Participants Enrolled as of 12/31/19	CAP Participant Rate
Duquesne	34,445	71.0%	36,075	73.1%	35,853	74.1%
Met-Ed	14,801	21.2%	14,927	20.7%	13,043	17.7%
PECO-Electric	119,552	76.7%	117,162	80.2%	111,124	79.6%
Penelec	20,956	23.8%	20,902	23.1%	18,287	20.0%
Penn Power	4,650	23.6%	4,619	23.0%	3,976	19.7%
PPL	51,692	28.4%	56,539	29.8%	63,306	33.4%
West Penn	25,700	37.4%	19,178	26.5%	15,692	21.2%
<b>Total/Industry Average</b>	<b>271,796</b>	<b>40.3%</b>	<b>269,402</b>	<b>39.5%</b>	<b>261,281</b>	<b>41.0%</b>

<sup>40</sup> 66 Pa. C.S. §§ 2802(10), 2804(9), 2203(7) and 2203(8). 52 Pa. Code §§ 54.71-54.78, 62.1-62.8, and 69.261-69.267.

*CAP Participation – Natural Gas Utilities – 2017-2019*

Utility	2017		2018		2019	
	Participants Enrolled as of 12/31/17	CAP Participant Rate	Participants Enrolled as of 12/31/18	CAP Participant Rate	Participants Enrolled as of 12/31/19	CAP Participant Rate
Columbia	22,255	32.8%	23,600	34.9%	22,707	33.6%
NFG	8,021	31.3%	7,728	34.5%	7,392	29.6%
PECO-Gas	20,723	74.6%	20,310	79.0%	19,358	77.5%
Peoples	17,565	29.2%	17,425	62.0%	15,969	23.6%
Peoples-Equitable	12,921	29.0%	13,194	64.7%	12,214	29.4%
PGW	49,310	33.7%	51,371	34.4%	54,040	36.8%
UGI South	8,169	24.4%	8,975	25.8%	11,265	28.8%
UGI North	5,353	24.4%	5,744	26.2%	7,613	30.5%
<b>Total/Industry Average</b>	<b>144,317</b>	<b>34.9%</b>	<b>148,347</b>	<b>45.2%</b>	<b>150,558</b>	<b>34.4%</b>

*Monthly Average Electric CAP Participation – 2017-2019*

Utility	2017	2018	2019
Duquesne	37,596	35,173	36,418
Met-Ed	14,875	15,201	13,993
PECO-Electric	126,401	116,325	112,157
Penelec	21,154	21,210	19,435
Penn Power	4,667	4,640	4,217
PPL	52,726	54,978	61,202
West Penn	25,568	22,150	17,232
<b>Total/Industry Average</b>	<b>282,987</b>	<b>269,677</b>	<b>264,654</b>

*Monthly Average Natural Gas CAP Participation – 2017-2019*

Utility	2017	2018	2019
Columbia	22,921	24,209	23,551
NFG	8,014	8,238	7,294
PECO-Gas	21,898	20,238	19,427
Peoples	18,194	17,445	17,034
Peoples-Equitable	13,009	13,251	12,928
PGW	48,471	49,034	53,722
UGI South	8,326	7,576	8,422
UGI North	5,666	4,830	5,369
<b>Total/Industry Average</b>	<b>146,499</b>	<b>144,821</b>	<b>147,747</b>

# Universal Service Programs & Collections Performance

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## 2022 REPORT



**BUREAU OF  
CONSUMER SERVICES**

## Customer Assistance Programs (CAPs)

The PUC monitors implementation of universal service programs by EDCs serving more than 60,000 customers and NGDCs serving more than 100,000 customers. The USRR requires EDCs and NGDCs to report the number of customers enrolled in CAP. The PUC uses the number of participants enrolled in CAP at the end of the program year to quantify participation. Each qualifying EDC and NGDC submits a USECP for PUC approval and a third-party evaluation of its universal service programs. USECPs and Evaluations are posted on the PUC's website (Appendix 4 contains viewing instructions).

### CAP Participation Rate

The **CAP participation rate** is a “snapshot” of CAP participation based on customers enrolled in CAP as of Dec. 31, 2022, divided by the number of confirmed low-income customers served by the EDC or NGDC. The PUC expects EDCs and NGDCs to maintain open enrollment to meet the need in each public utility’s service territory. The CAP participation rate would be much lower if the rate reflected estimated low-income customers rather than confirmed low-income customers, as estimated customer numbers based on census data are much higher and less accurate.

The **Monthly Average CAP Participation** reflects the average number of customers enrolled in a public utility’s CAP. As CAP enrollments may fluctuate during heating and non-heating months, the average number of CAP customers can provide a more accurate count of customers who participated in CAP during a calendar year. The **Monthly Average CAP Participation by Poverty Level** reflects the FPIG level (*i.e.*, 0-50%, 51-100%, 101-150%) for average CAP customers, based on their household income.

### CAP Participation – Electric Utilities – 2020-2022

Utility	2020		2021		2022	
	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate
Duquesne	33,638	70.6%	35,229	73.2%	38,092	74.5%
Met-Ed	19,310	26.4%	21,280	36.7%	21,325	36.7%
PECO-Electric	114,735	84.6%	121,408	86.1%	121,487	83.7%
Penelec	25,345	28.1%	28,463	39.1%	28,988	39.8%
Penn Power	5,546	27.9%	6,281	38.9%	6,835	41.9%
PPL	65,862	34.0%	64,673	32.9%	68,949	34.6%
West Penn	22,591	30.0%	24,792	39.3%	25,124	39.8%
<b>Total/Industry Average</b>	<b>287,027</b>	<b>45.2%</b>	<b>302,126</b>	<b>50.7%</b>	<b>310,800</b>	<b>51.3%</b>

**CAP Participation – Natural Gas Utilities – 2020-2022**

Utility	2020		2021		2022	
	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate
Columbia	23,542	34.6%	24,459	35.9%	23,982	34.2%
NFG	7,793	22.1%	7,201	25.7%	6,793	29.0%
PECO-Gas	20,188	77.0%	21,776	79.2%	22,334	77.1%
Peoples	31,202	28.7%	32,421	29.9%	28,367	26.3%
PGW	55,497	41.5%	53,466	48.4%	50,385	43.8%
UGI Utilities – Gas	24,236	31.3%	22,493	28.7%	19,914	23.4%
<b>Total/Industry Average</b>	<b>162,458</b>	<b>36.1%</b>	<b>161,816</b>	<b>38.4%</b>	<b>151,775</b>	<b>35.2%</b>

**Monthly Average Electric CAP Participation – 2020-2022**

Utility	2020	2021	2022
Duquesne	35,853	34,129	37,277
Met-Ed	16,186	20,441	22,111
PECO-Electric	113,536	118,393	119,149
Penelec	21,635	27,069	29,576
Penn Power	4,750	5,950	6,514
PPL	63,336	66,178	67,491
West Penn	19,090	23,853	25,700
<b>Total/Industry Average</b>	<b>274,385</b>	<b>296,013</b>	<b>307,818</b>

**Monthly Average Natural Gas CAP Participation – 2020-2022**

Utility	2020	2021	2022
Columbia	23,279	24,122	24,917
NFG	7,660	7,544	6,818
PECO-Gas	19,908	21,079	21,807
Peoples	28,892	32,126	29,760
PGW	54,646	59,139	51,883
UGI Utilities – Gas	23,860	23,264	19,976
<b>Total/Industry Average</b>	<b>158,243</b>	<b>167,273</b>	<b>155,162</b>

### 2023 CAP Participation

<b>PECO-Electric CAP Participation</b>		
<b>Participants Enrolled as of 12/31/23<sup>1</sup></b>	<b>Number of Confirmed Low-Income Customers<sup>2</sup></b>	<b>CAP Participant Rate</b>
123,043	161,799	76.0%

1. PECO electric distribution rate case Attachment OCA-II-1(a)
2. PECO electric distribution rate case Attachment CAUSE-PA-I-1(a)

<b>PECO-Gas CAP Participation</b>		
<b>Participants Enrolled as of 12/31/23<sup>1</sup></b>	<b>Number of Confirmed Low-Income Customers<sup>2</sup></b>	<b>CAP Participant Rate</b>
23,375	31,727	73.7%

1. PECO gas distribution rate case Attachment OCA-II-1(a)
2. PECO gas distribution rate case Attachment CAUSE-PA-I-1(a)



**C. Total Denials - Chester (2023)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	0
Household did not send required documentation	0	0	0	0	0	0	1	0	0	0	0	0
Household already received LIHEAP benefit	0	0	0	0	0	0	0	0	0	0	0	0
Balance exceeds program limit	0	0	0	0	0	0	3	0	1	0	0	0
Household already received MEAF benefit this year	0	0	0	0	1	0	0	0	0	1	0	0
Incomplete application	0	0	0	0	0	4	1	1	0	0	0	0
No balance owed	0	0	0	0	1	1	3	1	0	3	0	0
Account closed	0	0	0	0	1	0	0	1	0	0	0	0
Household did not follow-up	0	0	0	0	2	0	13	5	0	2	0	0
ERAP	0	0	0	0	0	0	3	5	3	5	0	0
Not in shutoff status	0	0	0	0	0	0	0	1	0	0	0	0
Other	0	0	0	0	0	0	2	0	0	0	0	0

**C. Total Denials - Delaware (2023)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	0
Household did not send required documentation	0	0	0	0	0	0	0	0	0	0	0	0
Household already received LIHEAP benefit	0	0	0	0	0	0	0	0	0	0	0	0
Balance exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	1
Household already received MEAF benefit this year	0	0	0	0	0	0	0	0	0	0	0	0
Incomplete application	0	0	0	0	0	0	0	0	0	0	0	0
No balance owed	0	0	0	0	0	0	0	0	0	0	0	0
Account closed	0	0	0	0	0	0	0	0	0	0	0	0
Household did not follow-up	0	0	0	0	0	0	0	0	0	0	0	0
ERAP	0	0	0	0	0	0	0	0	0	0	0	0
Not in shutoff status	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0

**C. Total Denials - Montgomery (2023)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	0
Household did not send required documentation	0	0	0	0	0	0	0	0	0	0	0	0
Household already received LIHEAP benefit	0	0	0	0	0	0	0	0	0	0	0	0
Balance exceeds program limit	0	0	0	0	0	0	1	0	3	1	0	0
Household already received MEAF benefit this year	0	0	0	0	0	0	0	0	0	0	0	0
Incomplete application	0	0	0	0	0	0	0	0	0	0	0	0
No balance owed	0	0	0	0	0	0	0	0	0	0	0	0
Account closed	0	0	0	0	0	0	0	0	0	0	0	0
Household did not follow-up	0	0	0	0	0	0	0	0	0	0	0	0
ERAP	0	0	0	0	0	0	0	0	0	0	0	0
Not in shutoff status	0	0	0	0	0	2	0	2	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0

**C. Total Denials - Philadelphia (2023)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	1	2	4	2	4	0	0	0	1	2	0	0
Household did not send required documentation	2	0	2	0	1	0	0	0	0	0	0	0
Household already received LIHEAP benefit	13	8	0	2	1	0	0	0	0	0	0	0
Balance exceeds program limit	8	7	5	7	5	0	11	5	3	4	0	0
Household already received MEAF benefit this year	0	0	0	0	0	0	0	0	0	0	0	0
Incomplete application	0	0	0	0	0	0	0	0	0	0	0	0
No balance owed	0	1	1	0	1	1	2	0	0	0	0	0
Account closed	0	0	0	1	2	2	0	0	0	0	0	0
Household did not follow-up	0	1	0	1	1	1	0	0	0	0	0	0
ERAP	0	0	0	0	0	0	0	0	0	0	0	0
Not in shutoff status	12	12	9	4	6	5	2	2	3	3	3	5
Other	1	1	2	1	1	1	0	1	1	1	0	0

**C. Total Denials - York (2023)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	0
Household did not send required documentation	0	0	0	0	0	0	0	0	0	0	0	0
Household already received LIHEAP benefit	0	0	0	0	0	0	0	0	0	0	0	0
Balance exceeds program limit	0	0	0	0	0	0	0	0	0	0	0	0
Household already received MEAF benefit this year	0	0	0	0	0	0	0	0	0	0	0	0
Incomplete application	0	0	0	0	0	0	0	0	0	0	0	0
No balance owed	0	0	0	0	0	0	0	0	0	0	0	0
Account closed	0	0	0	0	0	0	0	0	0	0	0	0
Household did not follow-up	0	0	0	0	0	0	0	0	0	0	0	0
ERAP	0	0	0	0	0	0	0	0	0	0	0	0
Not in shutoff status	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0

**C. Total Denials - Bucks (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0						
Household did not send required documentation	0	0	0	0	0	0						
Household already received LIHEAP benefit	0	0	0	0	0	0						
Balance exceeds program limit	0	0	0	0	0	0						
Household already received MEAF benefit this year	0	0	0	0	0	0						
Incomplete application	0	0	0	0	0	0						
No balance owed	0	0	0	0	0	0						
Account closed	0	0	0	0	0	0						
Household did not follow-up	0	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	0	0	0	0	0	0						
Other	0	0	0	0	0	0						

**C. Total Denials - Chester (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	5						
Household did not send required documentation	0	0	0	0	0	1						
Household already received LIHEAP benefit	0	0	0	2	0	0						
Balance exceeds program limit	0	0	0	0	0	3						
Household already received MEAF benefit this year	0	0	0	0	0	0						
Incomplete application	0	0	0	0	0	0						
No balance owed	0	0	0	0	0	0						
Account closed	0	0	0	0	0	0						
Household did not follow-up	0	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	0	0	0	0	9	0						
Other	0	0	0	0	0	2						

**C. Total Denials - Delaware (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	4						
Household did not send required documentation	0	0	0	0	0	0						
Household already received LIHEAP benefit	0	0	0	0	0	0						
Balance exceeds program limit	0	0	0	0	0	7						
Household already received MEAF benefit this year	0	0	0	0	0	0						
Incomplete application	0	0	0	0	0	0						
No balance owed	0	0	0	0	0	0						
Account closed	0	0	0	0	0	0						
Household did not follow-up	0	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	0	0	0	1	4	6						
Other	0	0	0	0	0	0						



**C. Total Denials - Montgomery (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	2	0	0	0	0						
Household did not send required documentation	0	0	0	0	0	0						
Household already received LIHEAP benefit	0	0	0	0	0	0						
Balance exceeds program limit	0	0	0	1	0	0						
Household already received MEAF benefit this year	0	0	0	0	0	0						
Incomplete application	0	0	0	0	0	0						
No balance owed	0	0	0	0	0	0						
Account closed	0	0	0	0	0	0						
Household did not follow-up	0	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	0	0	3	1	0	0						
Other	0	0	0	0	0	0						

**C. Total Denials - Philadelphia (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	2	6	4	3	2	0						
Household did not send required documentation	4	0	0	0	0	0						
Household already received LIHEAP benefit	11	8	7	0	0	0						
Balance exceeds program limit	9	10	8	8	10	0						
Household already received MEAF benefit this year	0	0	0	0	0	1						
Incomplete application	1	0	0	0	0	0						
No balance owed	2	0	4	3	2	2						
Account closed	2	1	2	1	0	1						
Household did not follow-up	1	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	15	12	6	6	3	11						
Other	1	0	0	5	4	0						

**C. Total Denials - York (2024)**

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
Household income exceeds program limit	0	0	0	0	0	0						
Household did not send required documentation	0	0	0	0	0	0						
Household already received LIHEAP benefit	0	0	0	0	0	0						
Balance exceeds program limit	0	0	0	0	0	0						
Household already received MEAF benefit this year	0	0	0	0	0	0						
Incomplete application	0	0	0	0	0	0						
No balance owed	0	0	0	0	0	0						
Account closed	0	0	0	0	0	0						
Household did not follow-up	0	0	0	0	0	0						
ERAP	0	0	0	0	0	0						
Not in shutoff status	0	0	0	0	0	0						
Other	0	0	0	0	0	0						