



September 9, 2024

To: All Parties of Record at Docket Nos. M-2022-3031727 and M-2023-3038944

RE: PPL Electric Utilities -Notification of Participation in LIHEAP Data Sharing

Overview

On June 13, 2024, the Pennsylvania Public Utility Commission (Commission) entered an Order (June 2024 Order) in *2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs*, Docket No. M-2023-3038944, (*2023 Review of Universal Service Programs*), establishing terms and conditions under which an energy public utility may document its election to participate in the Department of Human Services' (DHS) Low Income Home Energy Assistance Program (LIHEAP) data sharing.¹ The terms and conditions articulated in the June 2024 Order included a temporary and partial waiver of limited provisions in approved universal service and energy conservation plans (USECPs) for energy public utilities to facilitate their use of LIHEAP household data shared with them by DHS. The PUC encouraged but did not require an energy public utility to participate in the DHS LIHEAP data sharing. The PUC required energy public utilities to file and serve a letter at its USECP docket(s) indicating its plans and timelines if it chose to participate in the DHS LIHEAP data sharing. June 2024 Order at 2, OP #3.

On July 31, 2024, PPL Electric Utilities (PPL) filed a Letter (PPL Letter) at its 2023-2027 USECP (2023 USECP) docket, Docket No. M-2022-3031727, responding to the June 2024 Order. The PPL Letter confirms that PPL will participate in DHS' LIHEAP data sharing and identifies the public utility's planned compliance with the terms and conditions in the June 2024 Order, as summarized below:

Use the LIHEAP data to conduct individualized universal service outreach as soon as possible (ideally monthly) after receiving the household's data from DHS. June 2024 Order at 3.

Response: PPL reports that it will review the data provided by DHS "as soon as practical" after receipt of the monthly transmission. PPL states that it will complete an evaluation of each LIHEAP household's eligibility before conducting outreach. PPL notes that some households may have situations which exclude them from outreach, such as those with final or pending-final accounts, non-residential or time-of-use rates, or those with multiple PPL service accounts. PPL Letter at 2.

Use a simplified/streamlined process for households to enroll in universal service programs and recertify in the customer assistance program (CAP) if the income and household data was received by DHS in the prior 12 months and/or the current or prior

¹ The Commission established these terms and conditions based on its review of the recommendations of the Universal Service Working Group (USWG). See [USWG Final Report](#), Docket No. M-2023-3038944, at 73-83.

LIHEAP program year, without requiring additional applications or documentation.
June 2024 Order at 3.

Response: PPL reports that it will use a streamlined process to enroll eligible LIHEAP recipients in its universal service programs, with their informed consent, without requiring them to provide additional applications or proof of income. PPL also states that it will use the LIHEAP household data to auto-recertify households for CAP² without requiring additional applications or proof of income. PPL Letter at 2.

Discuss its plans for individualized outreach and simplified/streamlined enrollment with its respective Universal Service Advisory Group/Committee (USAG or USAC).
June 2024 Order at 3.

Response: PPL confirms that it will discuss its plans for use of the LIHEAP household data, customer outreach, and streamlined enrollment and recertification processes with its USAC at its next meeting. PPL Letter at 2.

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. June 2024 Order at 3-4.

Response: PPL reports that households recertified for CAP using LIHEAP household data will receive notice of their new CAP payment amount as well as instructions on how to contact PPL to provide additional updates on household income/size if the information has changed since completing the LIHEAP application. PPL Letter at 2.

Provide educational materials³ 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. June 2024 Order at 4.

Response: PPL reports that it will update its website with additional information to inform customers about the purpose and effect of the data sharing consent checkbox on the LIHEAP application. PPL reports this additional information will be added to its website by the opening date of the 2024-2025 LIHEAP season. PPL Letter at 2.

Identify any provisions in the energy public utility's current and proposed USECP that need to be waived or added to incorporate the data sharing conditions. June 2024 Order at 4.

² PPL's CAP is called OnTrack.

³ The educational language template was designed by the USWG. See USWG Final Report at 84 85.

Response: PPL proposes to modify its existing USECP to confirm that PPL will use validated income information provided by DHS to (1) confirm the household’s eligibility for CAP and (2) recertify the household for CAP and establish a new payment amount. PPL Letter at 2-3.

Discussion

To date, no protests or other responsive pleadings have been filed relative to the PPL Letter. The PUC directed staff in the Bureau of Consumer Services and the Law Bureau to review the letters filed in response to the June 2024 Order. Having reviewed the PPL Letter, staff finds that PPL’s responses are generally consistent with the June 2024 Order, with the following exceptions.

First, the PPL Letter and its proposed modifications to its USECP do not address how PPL will use the LIHEAP household data to enroll customers in non-CAP universal service programs (*e.g.*, Low Income Usage Reduction Program (LIURP),⁴ Hardship Fund⁵). PPL is encouraged to work with its USAC on developing streamlined processes for LIURP contractors and Hardship Fund agencies to use the LIHEAP household data to determine a household’s eligibility for benefits without requiring additional applications or documentation.

Second, PPL reports it will begin educating customers about the purpose of the data sharing checkbox by the opening date of the 2024-2025 LIHEAP season (*i.e.*, November 4, 2024). By that date, many PPL customers who received LIHEAP last season may have already completed and submitted their 2024-2025 LIHEAP applications. In September, DHS sends applications to households who received LIHEAP in the previous season. These customers may submit their applications to DHS before the season start date. DHS begins processing these pre-season applications by October. PPL is encouraged to provide educational information about the data-sharing checkbox on the LIHEAP application as early as September to ensure all PPL households eligible for LIHEAP are aware of the checkbox before completing their application. PPL is also encouraged to provide this education through its website and other mediums, such as bill inserts, on-bill messaging, outreach events, and communications with CAP and county assistance office agencies.

Conclusion

PUC staff finds PPL to be substantially compliant with the June 2024 Order, with the exceptions noted above. PPL is encouraged to discuss its proposed USECP changes with its USAC. No further action by PPL in regard to the terms and conditions established by the June 2024 Order is required at this time.

The determinations in this Secretarial Letter have been made by PUC staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. Parties may seek reconsideration of these directives by petitioning the Commission within 20

⁴ PPL’s LIURP is called WRAP.

⁵ PPL’s Hardship Fund is called Operation HELP.

days after service of this Secretarial Letter. See 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

If you have any questions, please contact BCS Energy Policy Manager Joseph Magee at jmagee@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

cc: Stephen M DeFrank, Chairman
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