PULP
PENNSYLVANIA
UTILITY LAW PROJECT

September 12, 2024

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029

Docket No. P-2024-3047290

Dear Secretary Chiavetta,

In accordance with 52 Pa. Code § 5.412a, and pursuant to the *Interim Order Granting Joint Stipulation for Admission of Testimony and Exhibits Into the Evidentiary Record* issued on September 3, 2024, please accept for filing the following admitted evidence of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA):

- **CAUSE-PA Statement 1, the Direct Testimony of Harry S. Geller**
  - Attachments: CAUSE-PA Exhibit 1, CAUSE-PA Exhibit 2, CAUSE-PA Appendix A, and CAUSE-PA Appendix B.
- **CAUSE-PA Statement 1-R, the Rebuttal Testimony of Harry S. Geller**

This testimony was duly admitted to the record pursuant to the Interim Order of Administrative Law Judge F. Joseph Brady on September 3, 2024, and is attached hereto for filing at this docket.

A copy of this letter is being served on ALJ Brady and the parties of record consistent with the attached Certificate of Service. Please contact me with any questions or concerns.

Respectfully Submitted,
Counsel for CAUSE-PA

Elizabeth R. Marx, Esq.
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Enclosures.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029	: : : :	Docket No. P-2024-3047290

CERTIFICATE OF SERVICE

I hereby certify I have on this day served copies of **Compliance Filing of CAUSE-PA** in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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September 12, 2024

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029	: : :	Docket No. P-2024-3047290

DIRECT TESTIMONY OF HARRY GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

June 3, 2024

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PREPARED DIRECT TESTIMONY OF HARRY GELLER

Q. Please state your name, occupation, and business address.

A. My name is Harry S. Geller. I am an attorney. I am retired from my former position as Executive Director of the Pennsylvania Utility Law Project (PULP), but have maintained an office at 118 Locust St., Harrisburg, PA, 17101, for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q. Briefly outline your education and professional background.

A. I received a B.A. from Harpur College, State University of New York at Binghamton in 1966, and a J.D. from Washington College of Law, American University in 1969. Upon graduation from law school, I entered the Volunteers in Service to America (VISTA) program, where I was assigned to the New York University Law School. I took courses in the Law School's Urban Affairs and Poverty Law program and worked with the Community In Action Program on the West Side of Manhattan in New York City from 1969-1971. In 1971, I started as a Staff Attorney for the New York City Legal Aid Society, Criminal Court and Supreme Court Branches in New York County. In 1974, I moved to Pennsylvania and began working for Legal Services, Incorporated (LSI). LSI was a civil legal aid program serving Adams, Cumberland, Franklin and Fulton Counties. I worked at LSI from 1974-1987 first as a Staff Attorney, then as Managing Attorney, and ultimately became Executive Director. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

In 1988, I was hired to be the Executive Director of PULP, a statewide legal services program dedicated to the rights of low-income utility customers. At PULP, I represented low-

income individuals with utility and energy concerns, and supported organizations advocating for low income households in utility and energy matters. As the Executive Director of PULP, I consulted and co-counseled on a wide variety of individual utility consumer cases, and I participated in task forces, work groups and advisory panels. For many years, I served as Chairman of the LIHEAP Advisory Council to the Department of Human Services and the Consumer Advisory Council to the Public Utility Commission. Throughout my career, I regularly trained community organizations, legal aid staff, and advocacy groups across Pennsylvania about the various utility and energy matters affecting Pennsylvania's low-income population. I retired from PULP on June 30, 2015. Although no longer employed by PULP, I now serve as a consultant to PULP and its clients. In sum, I have over 50 years of experience working with and providing services to households in poverty, including over 30 years of experience working specifically on utility and energy issues affecting low-income consumers. My resume is attached as Appendix A.

Q. Please describe the focus of your work, including relevant work experience on issues of low-income families' ability to afford essential goods and services such as utilities?

A: I have represented low-income individuals and organizations serving low income populations in a wide variety of legal matters, including family law, public benefits, unemployment compensation, utility shut-offs, debtor/creditor, bankruptcy, and housing related disputes. Over the past 32 years, my focus has been ensuring that low-income households can connect to, afford, and maintain utility and energy services.

In all of these legal matters, I worked almost exclusively on behalf of individuals and households that subsist on income that is at or below 150% of the Federal Poverty Level (FPL). Through this work, I have become intimately familiar with the daily lives of countless of our poorest citizens. I have spent thousands of hours assisting clients to comb through their budgets

to attempt to assist them to make ends meet. Over the years, I have consistently been surprised by the almost complete inability of low income families to pay the most basic monthly necessities on the incomes they have. Each and every month, my clients faced the stark choice of choosing which bills they could forgo with the least drastic consequences. That struggle is even more profound today than when I retired several years ago, as low income communities face unprecedented economic disparities as a result of the pandemic response.

In addition to my deep understanding of the daily monetary struggles facing poor families, I have an extensive knowledge of the array of programs designed to allow low-income individuals to afford electric service and other essential utility services.

While at PULP, I was involved in countless proceedings evaluating the effectiveness of required Universal Service Programs to assist low-income families. I have spent thousands of hours identifying program issues in Universal Services and making recommendations for changes to Universal Service programming to better serve low-income consumers. Ultimately, this advocacy led to the recognition that integrated programs for low income consumers were necessary. As the Executive Director of PULP, I played an instrumental role in the development, oversight, and monitoring of the initial pilot programs that have since evolved into the current statutorily required low-income Universal Service Programs. Each of these programs is structured to provide a different and complementary form of assistance to low-income customers, such that those customers have the ability to afford and maintain basic utility service.

For example, the Customer Assistance Program (CAP) provides alternatives to traditional collection methods for low income, payment troubled utility customers. The Low Income Usage Reduction Program (LIURP) is a targeted weatherization and energy efficiency program designed to assist low-income households with the highest energy consumption, payment problems, and

arrearages. These programs work in tandem and are designed to assist low-income households in maintaining affordable utility services, improve home safety and efficiency, and reduce utility collections, thereby benefitting other ratepayers.

Q. For whom are you testifying in this proceeding?

A. I am testifying on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA").

Q. Please state the purpose of your Direct Testimony.

A. The purpose of my testimony is to address issues presented by the Petition of PPL Electric Utilities Corporation ("PPL" or "the Company") for Approval of its Default Service Programs for the Period of June 1, 2025 through May 31, 2029 (hereinafter "DSP VI"), including issues related to PPL's role in ensuring vulnerable consumers have access to affordable rates.

In section I, I will first provide an overview of PPL's DSP proposals and my overall recommendations related thereto. In section II, I provide a data-driven assessment of residential shopping as a whole, and the impact of residential shopping on confirmed low income customers and other vulnerable customer groups. In sections III-VIII, I will separately address PPL's various DSP proposals. Section III will address PPL's proposed continuation of its Time of Use (TOU) rates with minor adjustments to the peak period; Section IV will address PPL's proposed continuation of its Standard Offer Referral Program (SOP), with modifications to improve processes at the end of the 12 month program term; and Section V will address PPL's proposed revisions to the enrollment process for low income shopping customers applying for PPL's Customer Assistance Program (known as OnTrack), to eliminate enrollment delays that contribute to the unnecessary accrual of debts. Finally, in section VI, I will provide a brief summary of my recommendations.

While my testimony is focused on these discreet issues identified in PPL's initial filing, my silence with respect to any specific PPL proposal should not be construed as support or endorsement of those proposals. I reserve the right to comment on other issues in response to the direct testimony of other parties in this proceeding which may amend, augment, or otherwise change the nature of PPL's initial filing.

I. SUMMARY OF PPL DSP VI PROPOSALS

Q: Please summarize PPL's DSP VI proposal for residential default service procurement.

A: PPL filed the docketed DSP proceeding in accordance with its responsibilities as a Default Service Provider pursuant to Pennsylvania's Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2891 *et seq.* (the "Competition Act"), as amended by Act 129 of 2008 ("Act 129"); the Commission's default service regulations found at 52 Pa. Code §§ 54.181-54.189; and the Commission's Policy Statement on Default Service at 52 Pa Code §§ 69.1801-1817. Specifically, PPL is obligated to provide electric generation service to all customers within its service territory who do not choose to receive generation services from a retail electric generation supplier ("EGS") or who chose to return to default service at the conclusion of a contract for generation service with a previously selected supplier, or when an EGS providing electric generation is unable or unwilling to continue to serve the customer.

For its residential default service customer class, PPL proposes to procure a laddered portfolio of default service contracts through the purchase of fixed-price, full-requirements, load-following energy and energy related products every six months (February and July), with staggered 12 month (10% of load) and 24 month (20% of load) contract terms.[1]

[1] PPL Default Service Petition at 14-15, ¶ 39-40.

PPL also proposes to procure 150 MW of 10-year Long-Term Block products (block supply and capacity credits, and proposes to enter into one or more long-term twenty year contract(s) to acquire up to 30,000 PA Solar AECs annually.[2] PPL is proposing to procure all of its Alternative Energy Credits (AECs) through a new competitive procurement auction.[3]

PPL is proposing to operate another four-year DSP program, from June 1, 2025 through May 31, 2029, with bi-annual auctions.[4] This will result in 6-month adjustments to the default service price, otherwise referred to as the price to compare (PTC).

Q: Is PPL proposing any alternative default service rate structures for residential consumers?

A: Yes. PPL is proposing to continue offering a Time of Use (TOU) rate for residential default service customers. While largely unchanged from its current TOU rate offering, PPL is proposing to amend its year-round on-peak hours to 3:00 pm to 7:00 pm – eliminating its current seasonal variation between summer and winter.[5]

Q: Does PPL propose any additional programs related to the provision of default service or residential customer shopping?

A: Yes. PPL is proposing to continue its current Standard Offer Program (SOP), though it seeks to modify the program to better protect consumers from excessive pricing at the conclusion of the 12-month program term.[6] Specifically, PPL is proposing to (1) increase the supplier referral fee to $33, (2) require suppliers to return SOP participants to default service at the end of the program term, absent an affirmative election of the customer to remain with the supplier or elect a

[2] Id.
[3] Id. at 14, ¶ 39.
[4] Id. at 14, ¶ 37.
[5] Id. at 34-36, ¶ 107-112.
[6] Id. at 32-34, ¶ 101-106.

new supplier, (3) inform participants when their SOP term is nearing conclusion, and (4) limit solicitation for SOP to once per month.

Q: Is PPL proposing any other changes to its programs or policies regarding default service?

A: Yes. PPL is proposing to amend the rules for enrollment in its OnTrack program to allow OnTrack applicants the option to return to default service upon enrollment in the program, without requiring additional process, and to prohibit suppliers from charging OnTrack participants an early termination or cancellation fee.

Q: Are you supportive of PPL's DSP VI proposals?

A: Largely, yes. Nevertheless, I have a few recommendations to further improve on each of these proposals to help ensure that residential consumers – and in particular, economically vulnerable consumers – are protected from unaffordable rates.

As I will explain in detail below, data revealed through discovery in this proceeding shows a disturbing and prolonged pattern in the competitive market: Since 2015, residential shopping customers in PPL's service territory were charged over $335 million in excess of the default service price for electricity.[7] Low income shopping customers in PPL's service territory (excluding those enrolled in CAP) are charged millions of dollars more for electricity each and every year …to the tune of over $84.8 million in excess of the default service price since 2015.[8] Even more disturbing, evidence suggests that higher supplier rates may be concentrated in low income communities. Indeed, low income shopping customers are charged substantially higher average shopping prices when compared to residential customers as a whole. For example, in

[7] CAUSE-PA Exhibit 1, Residential Shopping.

[8] CAUSE-PA Exhibit 2, Confirmed Low Income (Non-CAP) Shopping.

January 2024, residential shopping customers were charged an average of $6.94 more than the default service price, while confirmed low income customers (not enrolled in CAP) were charged an average of $19.08 more than the default service price.[9] These stark disparities in energy costs call for dramatic reforms to improve pronounced market disparities.

As discussed in detail throughout my testimony, PPL's DSP program proposals – when coupled with the additional recommendations I offer below – are critical to improve the market and to protect vulnerable consumers from harm.

II. RESIDENTIAL AND LOW INCOME CUSTOMER SHOPPING

Q: What information and data did you analyze in preparing your testimony?

A: PPL provided monthly shopping participation rates, energy consumption, and total billing for residential shopping customers from January 2018 through April 2024, which allowed me to calculate the average shopping price per kWh. I then compared that average price to the applicable default service price to calculate the total and average price charged to residential shopping customers – including all savings and all costs. I also reviewed prior analysis of residential shopping data for 2015 through 2017, I conducted while serving as an expert witness in PPL's DSP V proceeding. I was able to match up similar data sets to provide over 9 years of residential shopping data. This analysis is included in CAUSE-PA Exhibits 1 and 2.

In addition to this granular data, and other information and documents disclosed through discovery, I also reviewed various academic reports and studies pertaining to the residential retail energy markets in Pennsylvania and in other states where similar trends are occurring.

[9] CAUSE-PA Exhibits 1 and 2.

Q: Please describe what you found through this analysis of residential shopping data.

A: Since 2015, residential shopping customers in PPL's service territory were charged more than $339 million more than they would have been charged if they remained on default service.[10] In just the first four months of 2024, PPL's residential shopping customers were charged approximately $9.8 million dollars more than the applicable default service price.[11] Since 2018, on a per customer basis, residential shopping customers were charged an average of $482.27 in excess of the applicable default service price.[12]

TABLE 1: Residential Shopping – Total Charges Over Default Service Price[13]

	Charges in Excess of Default, Overall Average	Charges in Excess of Default, Average Per Customer
2015	$(19,239,568)	-
2016	$78,505,894	-
2017	$42,370,250	-
2018	$76,441,488	$145.65
2019	$82,323,331	$166.22
2020	$66,173,901	$138.34
2021	$67,476,906	$148.26
2022	$(17,596,324)	$(37.13)
2023	$(47,087,708)	$(98.74)
2024 (Jan-Apr)	$9,851,945	$19.68
Total	**$339,220,116**	**$482.27**

Notably, residential shopping customers achieved net savings in 2022 and 2023 – after six straight years of net losses which cost residential consumers hundreds of millions of dollars. On its face, the net savings achieved in 2022 and 2023 seemingly indicate a positive development. However, that short-lived deviation has already given way to a return of excessive pricing through

[10] CAUSE-PA Exhibit 1.
[11] CAUSE-PA Exhibit 1.
[12] CAUSE-PA Exhibit 1. Note that the data necessary to calculate per-customer average shopping prices from 2015 through 2017 is unavailable.
[13] CAUSE-PA Exhibit 1.

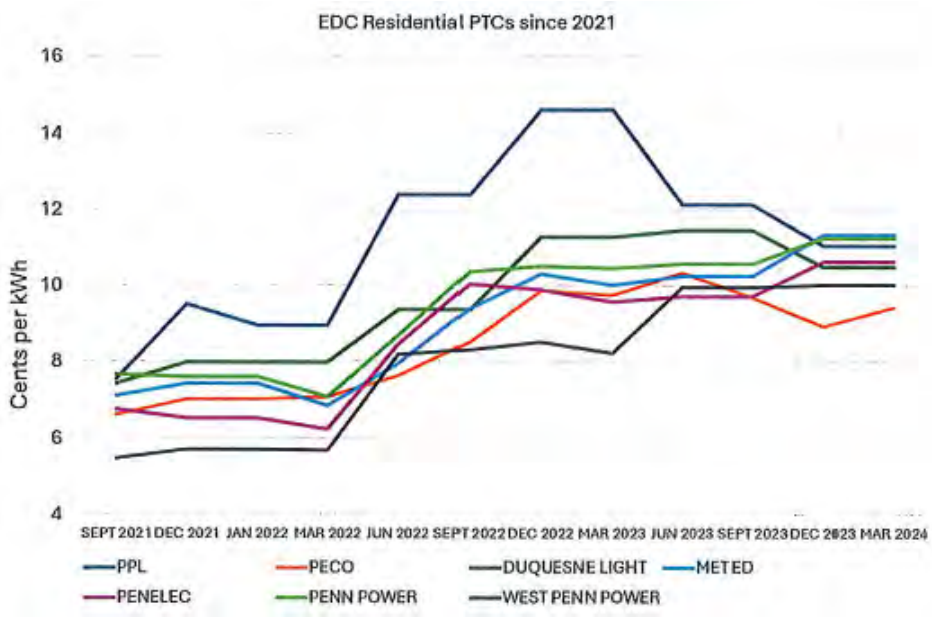
2024. Indeed, the level of average savings achieved in 2022 and 2023 years is dwarfed by the excessive costs in 2016, 2017, 2018, 2019, 2020, 2021, and to date in 2024.

Q: What was the primary driver of the net savings achieved by residential shopping customers in 2022 and 2023?

A; PPL's default service price was abnormally high from June 2022 through November 2023 – far exceeding default service prices in every other Electric Distribution Company (EDC) service territory.

TABLE 2: EDC Residential Default Service Price to Compare (PTC) 2021-2024[14]

	Dec. 1 2021	March 1, 2022	June 1, 2022	Sep. 1, 2022	Dec. 1, 2022	March 1, 2023	June 1, 2023	Sep. 1, 2023	Dec. 1, 2023	Mar. 1, 2024
PPL	9.502	9.502	12.366	12.366	14.612	14.612	12.126	12.126	11.028	11.028
PECO	7.023	7.066	7.637	8.508	9.855	9.726	10.312	9.672	8.917	9.425
Duquesne	7.98	7.98	9.36	9.36	11.25	11.25	11.45	11.45	10.46	10.46
MetEd	7.414	6.832	7.936	9.397	10.303	9.991	10.24	10.24	11.306	11.306
Penelec	6.507	6.232	8.443	10.021	9.889	9.561	9.703	9.703	10.607	10.607
Penn Power	7.593	7.082	8.694	10.348	10.511	10.439	10.556	10.556	11.231	11.231
West Penn	5.698	5.667	8.198	8.306	8.517	8.228	9.929	9.929	10.001	10.001



[14] Pa. PUC Consumer Advisory Council, Spring 2024 Competitive Markets Update (March 26, 2024.

In every month where net shopping savings were achieved in PPL's service territory, the average shopping price per kWh in PPL's service territory exceeded the default service price in all other EDC service territories.[15] In short, I believe the overall average savings achieved by residential shopping customers in 2022 and 2023 were predominately attributable to PPL's abnormally high default service prices.

Q: Residential shopping customers also achieved savings in 2015. What was the driver of savings in that year?

A: PPL's residential shopping customers achieved overall savings in 2015,[16] following the aftermath of the 2014 Polar Vortex and the increased regulatory oversight and market reforms precipitated by extreme spikes in competitive market pricing and the resultant widespread consumer flight out of the competitive market.

Q: What do these trends tell us about the state of the residential competitive market?

A: I believe the direct correlation between PPL's educational efforts and the ability for residential consumers to save in some months tells us that direct, targeted education and outreach are critically important components to help ensure residential consumers can achieve savings in the competitive market. However, that is not the full answer. As I noted above, it appears the savings achieved by shopping customers in PPL's service territory in recent months were a direct result of PPL's comparatively high default service price, indicating that there are deeper issues in the regulatory structure for competitive market engagement that warrant close examination. This is particularly true for economically vulnerable households. Indeed, confirmed low income

[15] Id.; CAUSE-PA Exhibit 1.
[16] CAUSE-PA Exhibit 1.

shopping consumers have not achieved net average savings over the default service price in *any* year since at least 2015.[17]

Q: You note above that evidence suggests PPL's low income customers have been disproportionately impacted by excessive supplier pricing. Please explain.

A: It is important to first note that there are some data constraints that limit the full analysis of low income customer shopping. Namely, PPL is only able to report specific low income shopping data for confirmed low income customers, which the Commission defines as "[a]ccounts where the EDC has obtained information that would reasonably place the customer in a low-income designation."[18] PPL includes the following customers in its "confirmed low income customer" count:

- Participants in OnTrack
- Customers who have received a LIHEAP or Crisis grant within 12 months of reporting period; or
- Customers who have reported their income to PPL Electric and are level 1 (below 150% of poverty) within 12 months of the reporting period. [19]

Because PPL's definition of "confirmed low income" is so limited, including only those who have recently provided income information, a significant percentage of PPL's low income customers are not accounted for when using this metric. On the other hand, PPL's "estimated low income" customer count is based on local census data, adjusted proportionally to the number of PPL's residential customers. In 2022, the last year that this information was publicly reported, PPL had an average of 199,360 confirmed low income customers (16% of its residential customer

[17] CAUSE-PA Exhibit 2.
[18] 52 Pa. Code § 54.74.
[19] CAUSE-PA to PPL I-2.

population) - compared to 398,427 estimated low income customers (31.7% of its residential customer population).[20]

Despite this data limitation, the confirmed low income customer group is generally representative of the overall low income customer group within PPL's service territory and provides a helpful metric to assess the impact of various policy and program changes.

Since 2015, confirmed low income customers in PPL's service territory were charged a net average of over $86.6M more than they otherwise would have been charged if they remained on default service.[21] Note that for the purpose of this analysis, I excluded customers enrolled in PPL's Customer Assistance Program (known as OnTrack) because CAP participants are not permitted to shop while enrolled in the program.[22] On an average *per customer* basis, the annual amount charged to confirmed low income customers in excess of the default service price reached a high of $259.17 in 2021 – adding $21.59 *each month* to low income customer bills. Notably, in 2021, we were just emerging from the COVID-19 pandemic and in the throes of severe economic turbulence – with utility debts reaching unprecedented levels. High supplier pricing during this time exacerbated a deeply challenging period for low income consumers in PPL's service territory.

For low income customers, the trend of high pricing has continued, evidencing a deep disparity in the rates suppliers charge to low income customers compared to general residential customers. Even while residential customers achieved average savings in 2022 and 2023, confirmed low income customers continued to face higher annual prices in the competitive market.

[20] See Pa. PUC, BCS, 2022 Report on Universal Service Programs and Collections Performance, at 8,9 (Sept. 2023), available at https://www.puc.pa.gov/media/2573/2022-universal-service-report-final.pdf.
[21] CAUSE-PA Exhibit 2.
[22] This CAP shopping restriction was put in place in PPL's last DSP proceeding in response to extensive data showing tens of millions of dollars in excessive charges to CAP participants and other residential ratepayers.

And in just the first four months of 2024, confirmed low income shopping customers were charged an average of $62.40 per customer more than the default service price.

TABLE 3: Confirmed Low Income (Non-CAP) Shopping – Total Charges Over Default Service Price[23]

	Charges in Excess of Default, Overall Average	Charges in Excess of Default, Average Per Customer
2015	$2,168,618	$35.17
2016	$12,336,768	$207.83
2017	$8,785,914	$146.67
2018	$13,129,839	$226.09
2019	$13,626,457	$253.56
2020	$12,492,663	$244.50
2021	$13,466,841	$259.17
2022	$5,134,455	$98.71
2023	$1,369,253	$18.89
2024 (Jan-Apr)	$4,132,517	$62.40
Total	**$86,643,324**	**$1,163.32**

Table 4, below, compares the average annual per customer charges in excess of the default service price for residential customers compared to confirmed low income customers since 2018, revealing substantial disparities in the shopping charges for confirmed low income customers as compared to general residential customers as a whole.

TABLE 4: Average Annual Per Customer Charges in Excess of Default, Residential vs. CLI

	Avg. Per Customer Charge Over Default - Residential Shopping	Avg. Per Customer Charge Over Default - Confirmed Low Income Shopping
2018	$145.65	$226.09
2019	$166.22	$253.56
2020	$138.34	$244.50

[23] CAUSE-PA Exhibit 2.

2021	$148.26	$259.17
2022	$(37.13)	$98.71
2023	$(98.74)	$18.89
2024 (Jan-Apr)	$19.68	$62.40

It is clear from this data that confirmed low income customers are facing even higher prices than general residential shopping customers, exacerbating already pronounced disparities in energy insecurity. Most notably, even in 2022 and 2023, when PPL default service prices skyrocketed, confirmed low income shopping customers obtained no net benefit from the competitive market and, unlike the general residential shopping population, still paid higher aggregate shopping rates.

Low income households already experience energy insecurity (the inability to afford basic energy services), and its concomitant threats to housing stability, employment and educational continuity, and health, safety, and family unity.[24] It is well documented that low income families are struggling profoundly to maintain energy services, often foregoing basic life necessities to afford energy services to their home.[25] According to the United States Census Bureau's Household

[24] See, e.g., Diana Hernandez, Understanding Energy Insecurity and Why It Matters to Health, 167 Soc. Science Medicine (Oct. 2016), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5114037/; see also Diana Hernandez, Yumiko Aratani, and Yang Jiang, Energy Insecurity Among Families with Children (Jan. 2014) http://www.nccp.org/publications/pub_1086.html. See also Rosenberg J, Rosenthal A, Castillo S, Edwards E, Erickson C, Nogelo P, Fenick AM. Medical Certification for Utility Shut-Off Protection and Health-Related Social Needs. Pediatrics. (2022) available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9647589/; National Consumer Law Center, Protecting Seriously Ill Consumers from Utility Disconnections, at 5 (2022), available at: https://www.nclc.org/resources/report-protecting-seriously-ill-consumers-from-utility-disconnections-what-states-can-do-to-save-lives-now/.

[25] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (January 9-February 5, 2024), https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042. The Energy Information Administration (EIA) Residential Energy Consumption Survey (RECS) released in 2022 further illustrates the profound impact of energy insecurity on low income families, with 19.9% of households reporting that they reduce or forgo food or medicine to pay for energy costs; and while 10% report leaving their homes at unhealthy temperatures because they could not afford to pay for energy. US EIA, 2020 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2020 available at: https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%2011.1.pdf. Importantly, energy insecurity is more pronounced for low income Black families. EIA's RECS data revealed that 52% of Black and African American households experience energy insecurity, compared to 23.2% of white households; and nearly 40.2% of

Pulse Survey, 26% of Pennsylvania households were unable to afford their home energy bills over the last 12 months – higher than the national average.[26] An increase in basic utility costs, such as those faced by confirmed low income shopping customers, exacerbates unaffordability, increases uncollectible expenses, and increases the risk of involuntary termination – in turn resulting in significant impacts to the health and safety of low income consumers.

Q: You mentioned earlier in your testimony that there is evidence to suggest that vulnerable populations are more likely to be targeted by high cost service contracts. Please explain.

A: A number of states have initiated investigations into their local competitive markets and found not only that residential customers pay more for third party service, but that low income and minority communities are the hardest hit.[27]

In Massachusetts, the state Attorney General's office initiated an investigation into the competitive market after receiving numerous complaints about door-to-door and telemarketing activities by competitive suppliers.[28] The report found that residential customers of competitive suppliers actually paid $253 million more than they would have for default service over a three year period.[29] The state Attorney General's report found the harm to low income households to be

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Black and African American households report foregoing food or medicine to pay energy costs, compared to 16.8% of white households. Id.

[26] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (data as of April 2-29, 2024), https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042.

[27] See 2018 MA AGO Report at 2, 39; see also La Risa Lynch, Alternative energy scams hit poor blacks and Latinos the hardest, complaints show, The Chicago Reporter, Nov. 16, 2018.
see also Laurel Peltier & Arjun Makhijani, Ph.D., Abell Foundation, Maryland's Dysfunctional Residential Third-Party Energy Supply Market: An Assessment of Costs and Policies (Dec. 2018) (hereinafter "Abell Report"), available at: https://www.abell.org/publications/marylands-dysfunctional-residential-third-party-energy-supply-market.

[28] 2018 MA AGO Report at 2, 39.

[29] MA Attorney General, Are Consumers Benefiting from Competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts, August 2019 Update, at vii, 6 (hereinafter "MA 2019 Update") available at: https://www.mass.gov/files/documents/2019/07/31/Massachusetts%202019%20Update_August%202019.pdf

"overwhelming" and "alarming," with low income households participating at double the rate of all other households while being charged higher rates.[30] The report stated:

> Specifically, a community's percentage of minority households; African American households; Hispanic households; households with limited English proficiency; and low-income households correlates with higher rates of participation in the individual residential market for electric supply.[31]

The report further noted: "Not only are participation rates significantly higher in communities with five of the six demographic attributes…analyzed, but also the premiums that residents in these communities pay as a result of choosing competitive suppliers is greater than in other areas of Massachusetts."[32] Based on the results of this investigation, the Attorney General has called for a ban on suppliers contracting directly with residential customers and an end to the individual residential electric supply market.[33]

In Illinois, consumers in zip codes with a majority of Black residents made three times as many competition related complaints to the Public Utility Commission than majority white zip codes per household.[34] In these zip codes, nearly 90 percent of third party supplier customers overpaid for electricity, adding up to more than $138 million more from June 2017 through May

[30] 2018 MA AGO Report, at 38 (101,922 low income households payed $23.6 million more than they would have paid for default service. "The average low-income household on competitive supply lost $231 over the course of the year. Some households lost more than $541").
[31] 2018 MA AGO Report at 27.
[32] 2018 MA AGO Report at 27.
[33] 2018 MA AGO Report at 40-42; see also MA HD 1204/SD 880 - An Act Relative to Protecting Residential Electric Customers.
[34] See La Risa Lynch, Alternative energy scams hit poor blacks and Latinos the hardest, complaints show, The Chicago Reporter, Nov. 16, 2018, (investigating consumer complaints before the Illinois Public Utility Commission, and finding: "Majority Black ZIP codes have twice as many complaints per household as Latino ZIP codes and three times the rate of white ZIP codes").

2018.[35] These findings led to a new law providing increased consumer protections.[36] This legislation specifically limits supplier enrollment of any consumer who has received assistance from Low Income Home Energy Assistance Program (LIHEAP) or the state's Percentage of Income Payment Plan (Illinois's Customer Assistance Program).[37]

In New York, similar problems led the Public Services Commission (PSC) to ban the sale of competitive energy products to New York's Customer Assistance Plan participants.[38] Continued problems later led the PSC to order a comprehensive restructuring of the state's competitive supply market after finding that customers of competitive suppliers (referred to in New York as Energy Service Companies – or ESCOs) paid $1.2 billion more than they would have paid for default service over a three year period.[39] The PSC observed that, "[I]t appears that a material level of misleading marketing practices continues to plague the retail access market," and that customers pay more for products with no added benefit.[40] The PSC took decisive steps to overhaul its competitive market in an effort to bar suppliers from overcharging residential consumers and small commercial entities, including strengthening supplier eligibility requirements, prohibiting ESCOs

[35] See Illinois OAG, Attorney General Madigan Secures $2.65 Million in Refunds for Illinois Residents Defrauded by Sperian Energy, Oct. 15, 2018, available at http://www.illinoisattorneygeneral.gov/pressroom/2018_10/20181015.html; see also Annual Report to the General Assembly, the Governor, and the Illinois Commerce Commission, Submitted pursuant to Section 20-110 of the Illinois Public Utilities Act, Office of Retail Market Development, Illinois Commerce Commission, June 2018 (hereinafter "Illinois 2018 Annual Report"), available at: https://www.icc.illinois.gov/reports/report.aspx?rt=22 .

[36] See Illinois Home Energy Affordability and Transparency (HEAT) Act, SB 651 of 2019.

[37] See Ill. HEAT Act Sec. 16-115E(a) (exceptions provided for community aggregation and guaranteed savings programs).

[38] State of New York Public Service Commission, Order Adopting a Prohibition on Service to Low-Income Customers by Energy Service Companies, Case Nos. 98-M-1343, 06-M-0647, 98-M-0667, (Dec. 16, 2016) (hereinafter "NY Low Income Order").

[39] State of New York Public Service Commission, Order Adopting Changes to the Retail Access Energy Market and Establishing Further Process, Case Nos. 15-M-0127, 12-M-0476, 98-M-1343, at 8 (Dec. 12, 2019) (hereinafter "NY ESCO Order").

[40] Id. at 88-89.

from marketing products and services that are unrelated to commodity service, and improving customer access to transparent product information.[41]

Similar concerns have arisen in other states. Over approximately three years in Maryland, residential consumers paid $255 million more for competitive energy supply than they otherwise would have paid for default service and, again, low income households were impacted most profoundly by the increased costs.[42] A subsequent investigation, published in December 2021, looked at the zip codes most heavily targeted by door-to-door marketing sales and found substantially higher door-to-door energy marketing activities in predominately Black and low income zip codes compared to wealthier, predominately white communities.[43] For example, one of the most affluent and predominately white zip codes in Baltimore had 11 suppliers engaged in door-to-door sales, compared to 21 suppliers engaged in door-to-door sales in three predominantly Black and low income zip codes of East Baltimore.[44]

In March 2024, research from the Energy Institute at HAAS, Berkeley, dug even deeper into shopping data from Baltimore, concluding that low income households pay substantially higher prices than high-income households.[45] The researcher concluded that the disparity in rates charged to low income households is attributable – in part – to higher population density in low income communities, which decreases the cost of door-to-door marketing and results in more

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[41] See id.
[42] Abell Report at 2, 10; see also Susan M. Baldwin and Sarah M. Bosley, obo Maryland Office of People's Counsel, Maryland's Residential Electric and Gas Supply Markets: Where Do We Go from Here? (Nov. 2018) at vi, (hereinafter "OPC Report")(Residential consumers pay $54.9 million more annually for electricity and gas than if they had purchased energy from their utilities.)
[43] Marcus Dieterle, Energy Supplier Choice Aimed to Lower Marylanders' Bills, But Some Customers Are Left Feeling Powerless (Dec. 28, 2021), https://baltimorefishbowl.com/stories/energy-supplier-choice-aimed-to-lower-marylanders-bills-but-some-customers-are-left-feeling-powerless/.
[44] Id.
[45] Jenya Kahn-Lang, Dep't of Ag. & Resource Econ. & the Energy Institute at HAAS, UC Berkeley, Competing for (In)attention: Price Discrimination in Residential Markets (March 10, 2024), https://drive.google.com/file/d/1IClpnaf3gVy3X94YWhLtSSTMWKTzi16K/view.

frequent high-pressure, door-to-door marketing of energy supply offers in low income communities. Door-to-door and point-of-sale marketing does not facilitate comparison shopping, driving disproportionately higher cost energy supply offers in low income communities. Additionally, the researcher observed that zip codes with a high percentage of Black, Latino, Hispanic, immigrant households, and those with lower education levels and English proficiency, faced higher prices. For instance, households in predominantly Black zip codes paid about 20% more per kWh compared to those in predominantly white zip codes. This demographic disparity explained a significant portion of the variation in energy prices across different areas.[46]

In Connecticut, residential customers of retail electric suppliers overpaid by $38.2 million from September 2017 through August 2018.[47] In Rhode Island, competitive supply customers paid $55 million more over five years than they would have paid if they had been on Standard Offer, $28 million of which was paid by residential customers.[48]

This broad range of data across the residential energy markets in nearly a dozen states demonstrates a clear pattern of suppliers overcharging residential consumers, and low income and minority customers bearing disproportionately severe consequences. Considering the above cited data in this proceeding, there is no reason to believe that consumers in PPL's service territory entering the competitive market are isolated exceptions to this broader pattern.

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[46] Id. at 12-13.

[47] "OCC Fact Sheet: Electric Supplier Market, September 2017 through August 2018," Office of Consumer Counsel, updated on September 26, 2018, available at: https://www.ct.gov/occ/lib/occ/fact_sheet_electric_supplier_market_august_2018.pdf

[48] "DPUC Enacts New Rules for Competitive Electricity Suppliers Initiates Review of Competitive Supply Marketplace," Rhode Island Division of Public Utilities & Carriers, Press Release, May 8, 2018 (hereinafter "RI DPUC Press Release"); see also OPC Report at 35; see also Susan Campbell, Switching to a competitive power supplier could cost you, data shows, WPRI 12 Providence, Aug 8, 2018, available at: https://www.wpri.com/news/switching-to-a-competitive-power-supplier-could-cost-you-data-shows/ .

III. TIME OF USE RATE PROPOSAL

Q: Please summarize PPL's TOU Rate Proposal.

A: PPL is proposing to continue its existing TOU rate, with a minor change to the peak period. Specifically, PPL is proposing to consolidate the TOU on-peak hours to run between 3:00 PM to 7:00 PM throughout the year, eliminating the separate summer and winter distinctions. In support of this amendment, PPL explains that it conducted an analysis of various on-peak and off-peak hour configurations for summer, winter, and annual terms and found that shifting to a unified on-peak period offers slight savings compared to the current seasonal terms, while simplifying the structure for customers, potentially encouraging greater program participation.[49]

Q: Does PPL allow low income customers to participate in its TOU rate?

A: PPL generally allows low income customers to participate in its TOU, with the noted exception of customers enrolled in CAP (known as OnTrack).[50]

Q: Is the exclusion of CAP customers from the TOU rate a change from PPL's existing TOU rate?

A: No. PPL is not proposing a change. This restriction is part of PPL's existing TOU program.

Q: Do you agree with PPL's decision to continue excluding CAP customers from the TOU rate?

A: Yes. PPL's continuation of the CAP exclusion from TOU participation is correct. TOU rates are not compatible with CAP. The purpose of CAP is to provide low income households with a continuing affordable bill, based on a percentage of their household income. As I will explain further below, TOU rates not advantageous for many low income households and other vulnerable

[49] PPL St. 1 at 50-53.
[50] PPL St. 1 at 53.

consumer groups who do not have adequate discretionary usage. When the cost of service for a CAP customer increases above the default service price, there are three possible outcomes: (1) the CAP customer will be charged higher overall rates, and may prematurely expend their allotted maximum annual rate assistance; (2) residential consumers who finance CAP through rates will pay more for the program, as the amount of credits applied to the CAP bill will increase in order to produce an affordable bill; or (3) the increased cost will impact both CAP participants and residential consumers. Each of these potential outcomes is untenable and undercuts the explicit statutory goals and purpose of CAP to provide an affordable bill to economically vulnerable households.

Economically vulnerable households often have very little discretionary energy usage, such as washing machines, dish washers, and other large appliances, and are more likely to live in smaller homes with less efficient heating and cooling spaces – all factors which make it difficult to shift load during peak periods. [51] Consumers who are at home during the day or are reliant on electric-powered medical devices are at even greater risk, as usage curtailment during peak hours can have an immediate and substantial impact on health outcomes.[52] This includes seniors, individuals with disabilities, and families with young children – all of whom are generally more likely to be low income or income constrained and at home. For these households, usage patterns are often fixed or otherwise inflexible. Indeed, a household cannot shift their laundry routine to the late evening hours if they do not have a washer or dryer in their home…nor can they turn off their air conditioner during the hottest hours of the day if they are home during those hours.

[51] See John T. Colgan et al., Guidance for Utilities Commissions on Time of Use Rates: A Shared Perspective from Consumer and Clean Energy Advocates, at 26-27, Equity and Distributional Bill Impacts (July 15, 2017), https://uspirg.org/sites/pirg/files/reports/TOU-Paper-7.17.17.pdf; see also Lee V. White & Nicole Sintov, Health and Financial Impacts of Demand-Side Response Measures Differ Across Sociodemographic Groups, Nature & Energy Vol. 5 (Jan. 2020).

[52] See id.

Imposing time-varying pricing on consumers with fixed or inflexible usage patterns could disproportionately increase the cost of energy for Pennsylvania's most vulnerable consumers, and therefore is an inappropriate rate structure for CAP customers.

Q: Did PPL conduct any analysis of confirmed low income customer participation in its TOU rate?

A: Yes. Pursuant to the Settlement on PPL's DSP V proceeding, PPL was required to evaluate the impact of its TOU rate on confirmed low income customers. PPL witness Andrew Castanaro explained that PPL conducted this evaluation, but it was inconclusive. He explained that "PPL Electric has approximately 209,000 confirmed low-income customers, of which 90 are on the TOU rate, or less than 0.05%."[53] He further noted that CAP customers are not eligible for the TOU rate.[54] Based on these constraints, he concluded that the Company "was unable to come to any meaningful conclusions on the impact of the TOU rate on confirmed low income customers."[55]

Q: Do you have any comments regarding PPL's analysis and conclusions regarding low income participation in its TOU rate?

A: I agree with Mr. Castanaro that the sample size of CLI participants in the TOU rate is too small at this time to make meaningful conclusions about the data.

Q: Do you have any recommendations regarding PPL's TOU rate proposal?

A: Yes. As an initial matter, as discussed above, I support PPL's continued exclusion of CAP (OnTrack) customers from PPL's TOU rate. That said, there are tens of thousands of confirmed as well as non-confirmed low income customers in PPL's service territory who are not enrolled in CAP. Of the estimated 398,427 low income customers in PPL's service territory, just 68,949 were

[53] PPL St. 1 at 53.
[54] PPL St. 1 at 53.
[55] PPL St. 1 at 53.

enrolled in CAP as of December 31, 2022.[56] I believe that further reforms to the TOU rate are needed to ensure economically vulnerable consumers are able to seamlessly access and enroll in CAP. As I explained, time varying rates expose economically vulnerable households with inflexible energy usage to increased risks of significant financial harm and negative health impacts.[57]

To help prevent these risks, I recommend that PPL implement additional protections for all confirmed low income customers – as well as those with known medical usage. If these households seek to enroll in the TOU, PPL should first provide information about the availability of CAP rates – as well as other universal service programming, – including hardship fund grants, energy efficiency, and usage reduction programs – to help resolve affordability concerns.

In addition to this additional protection, PPL should be required to conduct targeted universal service program outreach to confirmed low income customers participating in the TOU rate. This will help ensure that confirmed low income customers are informed of more advantageous rate assistance programming that will meaningfully reduce the household's overall energy burden. This targeted outreach will help to minimize identified disparities in the negative financial impact of TOU rates on participants.

[56] 2022 Universal Service and Collections Performance Report at 8, 58.
[57] Time of Use Rates: A Shared Perspective from Consumer and Clean Energy Advocates, at 26-27, Equity and Distributional Bill Impacts (July 15, 2017), https://uspirg.org/sites/pirg/files/reports/TOU-Paper-7.17.17.pdf; see also Lee V. White & Nicole Sintov, Health and Financial Impacts of Demand-Side Response Measures Differ Across Sociodemographic Groups, Nature & Energy Vol. 5 (Jan. 2020) (emphasis added).

IV. STANDARD OFFER PROGRAM

Q: Please summarize PPL's Standard Offer Program, and the modifications it is proposing to institute for its DSP VI program.

A: Under PPL's current SOP, residential customers contacting PPL's customer service center are encouraged to select among a group of EGSs who have voluntarily chosen to offer customers a fixed 12-month contract priced at 7% below PPL's default service rate at the time of the offer. Customers may exit the SOP contract without penalty, whether to re-enroll with a new rate, choose another EGS, or return to default service.[58]

PPL uses a third-party service provider to manage its SOP. When customers express interest in the SOP, they are transferred to this third-party, which offers more information about the program and facilitates enrollment. EGSs pay a fixed fee of $28 per referred customer to this third-party. Customers who opt for PPL's Web Self Service program can join the SOP without involving the third-party service provider, in which case the supplier isn't charged a referral fee. PPL Electric is proposing an increase in the referral fee to $33 per customer referral while intending to continue utilizing the third-party for SOP administration.[59]

In DSP VI, PPL is seeking solutions for the problem of customers being subject to paying more than Default Service rates if they do not act upon their SOP contract's expiration. The Company proposes several modifications to its SOP, including requiring suppliers to automatically transfer SOP customers to Default Service upon contract expiration unless customers make an affirmative choice to remain shopping; adjusting the timing for suppliers to confirm their SOP participation status; enabling PPL to educate participants nearing the end of the SOP term about

[58] PPL St. 3 at 3.
[59] Id.

their options at the conclusion of the program period; limiting SOP solicitations to once per month; and modifying the SOP script to align with any approved changes by the Commission.

Q: What was the basis for PPL's proposed SOP modifications?

A: PPL Electric conducted an in-depth review of customers who rolled off the SOP from 2018 through 2023 and examined those customers' rates and activities for four months after the end of their SOP contract.[60] After reviewing the data, PPL concluded that the vast majority of its residential SOP customers – roughly 65% – did not make any affirmative decision at the expiration of their contract, and instead were automatically rolled onto a new contract.[61] In assessing the rates that these residential customers paid after the conclusion of the SOP, PPL found that 82.45% of residential customers who took no affirmative action to select a new supplier or return to default service paid more than the PTC in the first month.[62] That number was still 82.91% within 4 months after their SOP contract ended, 76.11*% of which were paying 10% or more over the default service price.*[63] Just 6.75% of these customers were paying at or below the default service price.[64]

Q: Do you support PPL's proposal to continue operating its SOP?

A: No. PPL's SOP – a Commission-regulated and utility-operated program – was initially developed and approved to foster residential consumer entry and positive involvement in the competitive supply market. In the decades since its initial implementation, it has been repeatedly modified. A number of those program changes were the result of my testimony and recommendations made in prior PPL DSP proceedings. However, the data and analysis over time indicates that neither a positive consumer experience, nor active consumer engagement, have

[60] PPL St. 3 at 10-16.
[61] Id. at 11.
[62] Id. at 14.
[63] Id. at 12.
[64] Id.

materialized. To the contrary, PPL's DSP appears to be contributing to the excessive supplier pricing discussed at the outset of my testimony, and it would not be in the public interest to continue its operation. The SOP entices participation in the competitive energy market with a 'guarantee' of energy savings. However, achievable savings are often short-lived, and are highly dependent on future pricing and active consumer engagement to ensure the initial offers continue to remain competitive with the changing PTC. For example, if a customer enrolled in PPL's SOP in May 2023, the applicable PTC was $0.1461. For less than a month, this customer would have received a 7% discount – a discount of roughly $0.01, or approximately $0.1361 per kWh. In the 11 months that follow, this customer would have been charged more than the applicable PTC – which declined to $0.1213 from June to November 2023, and to $0.1103 from December to May 2024. PPL's proposed reforms address the problems that arise at the conclusion of the SOP term, but do not address this fundamental inequity in the core design and operation of the SOP during the program term.

Currently, PPL's SOP provides a streamlined, easy to access 'on-ramp' into the market, with the promise of bill savings, but does not offer a streamlined, protective 'off-ramp' for inattentive, non-vigilant consumers to avoid the consequences of financial harm. To achieve savings in Pennsylvania's competitive residential energy market, consumers must be engaged and vigilant. Promoting automatic entry into a product subject to variable and volatile rates at the conclusion of the initial DSP period does not help improve the market, it erodes consumer confidence and fosters deep mistrust in alternative suppliers. Indeed, a single missed contract change deadline can result in significant financial consequences for households who roll onto a high-priced contract at the conclusion of the SOP. As Ms. Stumpf notes in her testimony, less than

half of SOP participants are actively engaged in the market at the conclusion of the SOP.[65] In the months that follow, passive SOP participants are often surprised by high bills - when it is too late to prevent the harm that has already occurred. Ms. Stumpf's analysis is based on averages, which only tells part of the story. In the fourth month following expiration of the SOP, nearly 3,000 prior SOP participants who did not affirmatively elect a new supplier were charged in excess of $0.19/kWh, with many hundreds exceeding $0.25/kWh.[66]

While this kind of surprise high bill can pose an inconvenience or a temporary hardship for middle and higher income households, it is particularly devastating for low income households – adding substantially to already unaffordable rates. As discussed above, low income consumers already face disproportionately high household energy burdens – foregoing other basic necessities to afford energy services to their home. When energy costs increase dramatically for low income customers, as it has for many customers at the conclusion of the SOP, involuntary termination is often quick to follow – along with increased collections costs and uncollectible expenses. Involuntary termination of electricity to a home can cause cascading consequences with deep and lasting impacts on low income families – often resulting in eviction, bankruptcy, health consequences, family separation, and long-term housing instability. The Commission should no longer endorse a program which can cause such devastating results for low income families.

The Commission should no longer require or permit PPL to operate the SOP. Suppliers seeking to provide a guaranteed discount similar to the 7% fixed discount provided through the SOP are free to do so on their own accord. However, given the program has become a streamlined on-ramp to a competitive contract which often triggers substantial financial consequences to

[65] PPL St. 3 at 11.
[66] CAUSE-PA to PPL I-12, Attachment 1.

program participants, it is neither just nor reasonable for this PPL-administered program to continue.

Q: If PPL's SOP is permitted to continue, do you agree with PPL's proposed modifications to improve customer education and to return customers to default service at the end of the program if the customer does not take affirmative action to select a new product?

A: Yes. If PPL's SOP is permitted to continue, PPL must improve consumer protections within the program. As explained at the outset of my testimony, the competitive market has been subject to repeated abuses and rampant overcharging that has caused consumers to lose confidence in the market.[67] And, as evidenced by the persistent and increasingly high supplier pricing for residential and confirmed low income customers, education is an important component to help ensure consumers are engaged in the market and are not severely penalized if they miss a deadline. However, education alone is insufficient to curtail abuses and reverse predatory practices. Returning passive, inattentive SOP participants to default service at the conclusion of the program

[67] For over a decade, marketers have continually violated state and federal law and the Commission's regulations. Issues with deceptive marketing and unauthorized switching (slamming) arose almost immediately after the price caps were lifted, and have not subsided. PUC v. Public Power, M-2012-2257858; PUC v. MX Energy, M-2012-2201861; IDT Energy, M-2013-2314312; PUC v. APG&E, M-2013-2311811; PUC v. Pa G&E, M-2013-2325122; PUC v. ResCom Energy, M-2013-2320112; see also Pa. PUC, 2018 Utility Consumer Activities Report and Evaluation (UCARE), at 9 (Dec. 2019). The significant financial impact of these deceptive, high-pressure marketing tactics on consumers became undeniably apparent when dramatic price spikes during the 2014 polar vortex led to a series of formal Commission enforcement actions against suppliers. See PUC v. Respond Power, C-2014-2427659, C-2014-2438640; PUC v. IDT Energy, C-2014-2427657; PUC v. Hiko Energy, C-2014-2427652, C-2014-2431410; PUC v. Blue Pilot Energy, C-2014-2427655; PUC v. Energy Service Providers D/B/A PA G & E, C-2014-2427656; PUC v. Clearview Electric, C-2016-2543592; PUC v. Plymouth Rock Energy, C-2016-2579276. Since then, despite further, repeated, and increasingly aggressive Commission guidance and enforcement actions, suppliers have continued this problematic behavior. See PUC v. Liberty Power Holdings LLC, M-2019-2568471; PUC v. Vista Energy Marketing LP, M-2019-2633094; PUC v. Astral Energy LLC, M-2018-2529738; PUC v. Residential Energy, M-2017-2511372; PUC v. Vista Energy Marketing LLC, M-2018-2624484; PUC v. WGL Energy Services, M-2015-2401964; PUC v. SFE Energy Services, M-2016-2546422; PUC v. Choice Energy LLC, C-2016-2581006; PUC v. American Power & Gas of PA, M-2017-2508002; PUC v. Liberty Power Holdings LLC, M-2019-2568471; PUC v. Oasis Power, F-2017-2618558; PUC v. American Power & Gas of PA, M-2017-2508002; see also PUC, 2018 Utility Consumer Activities Report and Evaluation (UCARE) at 9, http://www.puc.state.pa.us/filing_resources/consumer_activities_report_evaluation.aspx; 2017 UCARE at 8; 2016 UCARE at 8.

term will help to insulate nonengaged, non-vigilant SOP participants from acute financial hardship – providing an off-ramp for consumers who have not affirmatively elected to enter into active engagement with the competitive market.

As is, the SOP serves up a ready pipeline of residential consumers that are lulled into higher rates at the program's conclusion. This model is not promoting a healthy marketplace and, if allowed to continue, must be amended to better serve the needs of consumers and the marketplace. Thus, if PPL's SOP is permitted to continue, I am supportive of PPL's proposed modifications, as they, at a minimum, will help customers have better information about their options while providing a critical safety net for those who have not been adequately informed of, and are highly vulnerable to the consequences of inaction at the end of the SOP.

Q: Are there any other changes you would recommend if PPL's SOP is allowed to continue?

A: Yes. I recommend that PPL no longer solicit confirmed low income customers for enrollment in the SOP. As discussed, confirmed low income customers are *known* to PPL to be low income, meaning their gross household income is at or below 150% of the federal poverty level. For a household of 2, income must be at or below $30,660; and for a household of 4, income must be at or below $46,800. Non-CAP households at this income level should not be exposed to the short-term pricing risks associated with this program – both during the program term and in the subsequent months.

V. CAP SHOPPING RULES

Q: What is CAP?

A: The universal service provisions of the Choice Act tie the affordability of electric service to a customer's ability to pay for that service, and require the Commission to ensure that utilities appropriately fund and make available the programs and services necessary to achieve affordability of electric service in each electric distribution territory.[68] Consistent with the Act's definition of "*universal service and energy conservation*," the statutory goals of universal service are achieved through the enactment, establishment and maintenance of policies, practices and services that help low-income customers maintain their electric service.[69] Universal service programs include the special rates or discounts provided by CAP, energy efficiency, service termination protections, and consumer education.[70] While CAP customer shopping is a central focus of this case, it is important to realize that each of PPL's universal service programs – CAP, LIURP, CARES, and Hardship Funds – are intended to offer essential services that work in tandem to address various forms of energy insecurity and ensure low-income households can maintain access to an affordable, safe, and reliable electric supply.

PPL's Customer Assistance Program – or CAP – is known as OnTrack. PPL's CAP provides low income households (with income at or below 150% FPL) a monthly rate based on a percentage of the household's income and applicable Commission approved energy burden.[71] If a household enters CAP with debt incurred prior to program enrollment, their debt will be frozen

[68] 66 Pa. C.S. § 2804(9); see also, CAUSE-PA et al. v. Pa PUC and McCloskey v. PA PUC, 120 A.3d 1087, 1103 445 CD 2014, 596 CD 2014 (Pa. Commw. Ct., July 14, 2015) ("The obligation to provide low-income programs falls on the public utility under the Choice Act, not on the EGSs. Moreover, the Choice Act expressly requires the PUC to administer these programs in a manner that is cost-effective for both the CAP participants and the non-CAP participants, who share the financial consequences of the CAP participants' EGS choice.")
[69] 66 Pa. C.S. § 2803.
[70] 66 Pa. C.S. § 2803.
[71] PPL Electric Utilities Corp., Universal Service and Energy Conservation Plan (USECP) 2023-2027 (revised March 13, 2023), https://www.puc.pa.gov/media/2407/ppl_further_revised_2023-27_usecp.pdf

upon entry in the program, and is eligible for forgiveness with each in-full payment over a 36-month period.[72]

Q: Can PPL's CAP participants select a competitive supplier?

A: No. After long-term pricing data in PPL's last DSP proceeding revealed approximately $30.3 million dollars in excessive costs from 2013 to 2020, the Commission approved amendments to PPL's CAP rules requiring program participants to enroll in default service as a condition to enrollment in the CAP program.[73] This program reform was critically necessary to protect CAP customers and prevent tens of millions of dollars in unnecessary customer costs, which are ultimately borne by other residential ratepayers as a result of the higher rates.

Q: Do you support this CAP rule restricting participants from shopping for service in the competitive market?

A: Yes.

Q: Has PPL's CAP shopping restriction proven effective?

A: Yes, PPL's CAP shopping restrictions have helped to stem unnecessary programmatic costs. However, the rule has created new barriers to enrollment in CAP – causing delay and additional costs that serve to exacerbate energy insecurity and result in increased energy debts – and, ultimately, increased involuntary termination – for customers who cannot easily return to default service without incurring hundreds of dollars in additional debts.

[72] Id.
[73] PPL DSP V, St. 3 at 12 and CAUSE-PA Exhibit 3.

Q: You mentioned at the outset of your testimony that PPL is proposing to implement new procedures for low income shopping customers to enroll in CAP. Please explain.

A: As Ms. Stumpf explains in her direct testimony,[74] the process for low income shopping customers to apply for rate relief through CAP is cumbersome and can create barriers to CAP enrollment. When a low income shopping customer seeks to enroll in CAP, they have 15 days to cancel their contract, or their enrollment is dropped.[75] This requirement can cause substantial delays in program enrollment, causing the low income household to incur greater costs and, often, greater debts which may be later deferred and eligible for forgiveness through enrollment in the program. If a supplier imposes an early cancellation or termination fee, it can present an even greater hurdle for the customer to receive critical rate relief through the program – essentially establishing the barrier of an up-front payment for enrollment in this critically important universal service program. Delays in CAP enrollment can result in substantial cost for CAP applicants and the CAP program itself, which in turn increases the rates of all other residential ratepayers.

Since June 2021, when PPL first implemented its CAP shopping prohibition, 7,337 CAP applicants that were otherwise determined eligible for CAP were dropped from enrollment after failing to return to default service within the notice period.[76] This equates to a drop rate of roughly 1 in 3 low income shopping customers who seek to apply for rate assistance through CAP.

[74] PPL St. 3 at 27.
[75] Id.; see also CAUSE-PA to PPL II-2, Attachment 3.
[76] OCA to PPL I-14, Attachment 1; see also CAUSE-PA to PPL II-2, Attachments 1-3.

TABLE 5: CAP Rejections, Failure to Timely Return to Default Service[77]

	Timely Returned to Default – CAP Enrollment Approved	Failure to Return to Default – CAP Enrollment Rejected	Total Applicants Served by Supplier
2021 (Jun-Dec)	**3,432**	**1,304**	**4,736**
2022	**6,011**	**2,301**	**8,312**
2023	**5,814**	**3,256**	**9,070**
2024 (Jan-Mar)	**1,300**	**476**	**1,776**
Total	**16,557**	**7,337**	**23,894**

To help alleviate these barriers, and streamline CAP enrollment, PPL is proposing to modify its CAP enrollment procedures to permit CAP applicants to automatically return to default service upon enrollment in CAP and to prohibit suppliers from charging termination fees when a customer seeks to enroll in CAP.

Q: Are you supportive of PPL's proposals to amend its CAP enrollment rules and procedure?

A: Yes, I am strongly supportive of PPL's proposals to amend their CAP enrollment rules and procedure.[78] I note that these proposals are consistent with the proposals I made in PPL's last PPL DSP proceeding, as well as program rules established by the FirstEnergy Company in its most recent DSP proceeding.[79] Without these added protections, economically vulnerable customers who have already evidenced an inability to pay and cannot afford continued competitive supply, will face the functional equivalent of an upfront fee (in the form of an early termination or cancellation fee) to access critical rate assistance through CAP. Although customers choosing to

[77] OCA to PPL I-14, Attachment 1; see also CAUSE-PA to PPL II-2, Attachments 1-3
[78] PPL St. 3 at 28.
[79] Petition of Met Ed., Penelec, Penn Power, and West Penn Power for Approval of Its Default Service Plan for the Period From June 1, 2023 through May 31, 2027, Recommended Decision, Docket Nos. P-2021-3030012, -13, -14, -21, at ¶72 (June 29, 2022).

exit the SOP are not subject to these fees, other shopping customers are – including those who are low-income seeking to enter CAP. Such an outcome will serve to erode the cost-effectiveness of CAP and is contrary to the statutory obligation for the Commission to ensure that universal service programs – including CAP – are accessible to those in need.

In my experience, low income customers are most likely to seek enrollment in CAP when they are in active crisis – often following receipt of a 10-day or 3-day termination notice. Time is of the essence when processing CAP enrollment to prevent the loss of electricity to the home and a host of consequences to health, safety, and stability that follow. For these households, any time spent outside of the program serves to exacerbate payment trouble – causing arrears to grow unnecessarily, ultimately contributing to the cost of the program. This is especially true for low income shopping customers who may be paying significantly higher rates than the applicable default service price, further exacerbating payment issues.

PPL's proposed CAP rules will help improve timely accessibility to critical rate assistance programs for those in need, while also safeguarding against the financial hardships associated with excessive supplier rates.

Ultimately, any increase in rates necessarily results in increased program costs and rate unaffordability and is likely to result in a corresponding increase in uncollectible expenses and involuntary payment-related terminations. These impacts can and do have a deep and lasting impact on the health and wellbeing of those in the household and the welfare of the community as a whole. Indeed, a 2016 report of Pennsylvania's Joint State Government Commission on Homelessness found that utility assistance ranked in the top three types of assistance noted by

survey respondents (24.1 percent) that would have prevented homelessness.[80] Utility insecurity and resulting payment trouble is increasingly recognized as a predictor of first-time homelessness,[81] confirming the need to improve timely access to rate assistance programs to prevent the more costly consequences of homelessness to individuals, families, and communities.

Although of significant value, CAP is not a panacea to resolve low income energy insecurity – but it is, hands down, the most advantageous current option for confirmed low income customers facing acute energy insecurity. The average CAP household is desperately poor, and these extremely low income households routinely run out of money even with the assistance of CAP. In 2022, the average household income for CAP participants was just $14,124.[82] For context, this level of income was less than 50% FPL for a family of four in that year. Over 65% of PPL's CAP customers live below the poverty level.[83] PPL's most recent third party universal service program evaluation found that, before enrolling in CAP, 64% of PPL's CAP participants had to skip or delay paying for food, 29% had to skip or delay paying for medicine, and 39% had to skip or delay paying their mortgage or rent.[84] After enrolling in OnTrack, those payment hardships were reduced to 24%, 5%, and 20%, respectively, but were not eliminated – highlighting the profound energy affordability challenges for low income consumers at full tariff rates.[85]

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[80] Joint State Government Commission, Homelessness in Pennsylvania: Causes, Impacts, and Solutions, at 112, 157, 160 (April 2016), *available at* http://jsg.legis.state.pa.us/publications.cfm?JSPU_PUBLN_ID=447 ("When asked if there were any services that may have prevented them from becoming homeless, the women responded overwhelmingly that assistance with past-due rent and utilities, security deposit, and first and last months' rent would have been most beneficial.").

[81] Colin Middleton, Kim Boynton, David Lewis & Andrew M. Oster, The Value of Utility Payment History in Predicting Homelessness, PLOS (Oct. 9, 2023), https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0292305.

[82] 2022 Universal Service and Collections Report at 61.; see US Dep't of Health and Human Services, 2018 Federal Income Poverty Guidelines, https://aspe.hhs.gov/2018-poverty-guidelines.

[83] 2022 Universal Service and Collections Report at 61.

[84] APPRISE, PPL Electric Utilities Universal Service Programs Final Evaluation Report, at 71 (Jan. 2020), https://www.puc.pa.gov/pcdocs/1656535.pdf.

[85] Id. at 74.

Put simply, PPL's low-income customers are economically vulnerable and unable to pay for essential services like electricity without substantial and meaningful assistance. It is precisely for this reason that CAPs were created to assist low income customers to maintain and afford utility service.

VI. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Q: Please summarize your conclusions and recommendations.

A: Throughout the course of my testimony, I provided an overview of residential customer shopping, and responded to PPL's proposals regarding Time of Use rates, Standard Offer Program, and CAP Shopping proposal. The following is a high level overview of the conclusions and recommendations I made regarding each topic.

Residential Customer Shopping Overview

- Since 2015, PPL's residential shopping customers were charged, on average, $339,220,116 more than the default service price.
- On a per customer basis since 2018, PPL's residential shopping customers were charged, on average, $482.27 more than the default service price.
- Since 2015, PPL's confirmed low income customers were charged, on average, $86,643,324 million more than the default service price.
- On a per customer basis since 2015, PPL's confirmed low income customers were charged, on average, $1,163.32 in excess of the default service price.
- Evidence in this proceeding, coupled with evidence from other states, suggests that the most substantial financial harms in the competitive market have been concentrated in low income and minority communities – and warrants further attention from the Commission.

Time of Use Rate Proposal

- Time of Use rates have the potential to negatively impact CAP benefits, decreasing the effectiveness of CAP at delivering an affordable bill and increasing the cost of CAP to other ratepayers.

- Many low income households are unable to reasonably shift usage during off peak hours, as they most often do not have discretionary energy usage that could reasonably be curtailed.
- Other vulnerable consumers, including seniors, individuals with disabilities, and families with young children (all of whom are generally more likely to be low income or income constrained), often have inflexible usage patterns and are otherwise unable to reasonably shift their energy usage.
- Research has revealed a link between TOU rates and poor health outcomes in low income and minority communities attributable to usage deprivation.
- ***Recommendations:***
    - Affirm PPL's exclusion of CAP customers from participation in the TOU rate.
    - Implement additional protections for all low income customers, as well as those with known medical usage, to ensure they are appropriately referred to CAP or other universal service programs to help address affordability concerns.
    - Conduct targeted universal service program outreach to confirmed low income customers participating in the TOU rate.

Standard Offer Program

- Evidence strongly suggests that participants in the Standard Offer Program are not actively engaged in the competitive market and are likely to pay significantly more than the price to compare at the end of the SOP contract period.
- The vast majority of SOP customers – roughly 65% - did not make any affirmative decision at the expiration of their SOP contract, and instead were automatically rolled onto a new contract.
- Achievable savings through the SOP are often short-lived, and are highly dependent on future pricing and active consumer engagement to ensure initial offers remain competitive with the changing price to compare.
- In the fourth month following expiration of the SOP, nearly 3,000 prior SOP participants who had not affirmatively elected to continue with the current supplier or contract with a new supplier and had nevertheless been automatically placed into a new competitive

contract were charged rates in excess of $0.19/kWh – far exceeding applicable default service rate.

- ***Recommendations:***
  - Reject PPL's proposal to continue operating its SOP.
  - If PPL's SOP is permitted to continue operation, adopt the following reforms:
    - Approve PPL's proposal to return customers to default service if they do not make an affirmative decision to stay with their current supplier or to select a new supplier at the end of the 12 month SOP contract.
    - Approve PPL's proposal to perform targeted outreach to SOP customers about their shopping decision throughout the 12-month SOP contract, especially in the month leading up to the expiration of the SOP contract, to educate them about their options and provide information about how to compare offers.
    - Require PPL to host an annual SOP Stakeholder meeting to assess relevant data and determine whether PPL's flexible SOP guidelines for its CSRs are successful.

CAP Shopping Rules

- Energy insecurity threatens stable and continued housing, employment, and education; has substantial and long-term impacts on mental and physical health; creates serious risks to the household and the larger community; and negatively impacts the greater economy.
- Even with assistance, low income households are often still unable to afford the cost of energy, and often forego other critical necessities – or keep their home at unsafe temperatures – as a result of energy unaffordability.
- The current process and procedure for low income shopping customers to enroll in CAP is cumbersome, creates substantial barriers to program enrollment, and results in additional financial burden.
- Since 2021, 7,337 CAP applicants who were otherwise eligible for the program were dropped from enrollment after failing to return to default service within the notice period.
- ***Recommendations:***
  - Approve PPL's proposal to institute a CAP program rule that permits CAP applicants to automatically return to default service upon entry into the program.
  - Amend PPL's CAP rules to bar suppliers from charging any early termination or cancellation fees to CAP customers who return to default service upon entry into CAP.

Q: Does this conclude your direct testimony?

A: Yes.

RESIDENTIAL SHOPPING - PPL

January 2015 to April 2024

Date	Residential Shopping Customer Count	Residential Shopping Usage (kWh)	Total Residential Shopping Charges Billed	Avg $/kWh - Res. Shopping	Avg $/kWh Over Default Rate	Total Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over PTC Per Shopping Customer
2015-01			$ 73,310,993.00			($2,202,277)		$75,513,269	
2015-02			$ 74,187,961.00			($2,056,800)		$76,244,761	
2015-03			$ 80,325,109.00			($2,637,835)		$82,962,944	
2015-04			$ 56,467,659.00			($3,175,446)		$59,643,105	
2015-05			$ 39,640,000.00			($2,198,992)		$41,838,992	
2015-06			$ 43,659,429.00			($1,877,869)		$45,537,298	
2015-07			$ 49,268,863.00			($1,524,603)		$50,793,466	
2015-08			$ 54,842,542.00			($1,366,776)		$56,209,318	
2015-09			$ 50,148,066.00			($1,471,914)		$51,619,980	
2015-10			$ 39,911,268.00			($1,308,772)		$41,220,040	
2015-11			$ 42,553,496.00			($1,574,559)		$44,128,054	
2015-12			$ 52,770,076.00			$2,156,275		$50,613,801	
2015			**$ 657,085,462.00**			**$ (19,239,568)**		**$ 676,325,028**	**$ -**
2016-01			$ 64,188,785.00			$8,836,525		$55,352,261	
2016-02			$ 69,848,634.00			$8,905,427		$60,943,207	
2016-03			$ 59,450,151.00			$7,203,743		$52,246,408	
2016-04			$ 46,134,845.00			$5,322,011		$40,812,834	
2016-05			$ 37,260,871.00			$4,073,576		$33,187,295	
2016-06			$ 42,189,675.00			$5,354,859		$36,834,816	
2016-07			$ 47,778,560.00			$6,910,561		$40,867,999	
2016-08			$ 53,795,336.00			$7,726,251		$46,069,086	
2016-09			$ 50,402,317.00			$7,079,449		$43,322,868	
2016-10			$ 37,011,319.00			$5,084,133		$31,927,186	
2016-11			$ 39,624,809.00			$5,141,953		$34,482,856	
2016-12			$ 52,226,879.00			$6,867,406		$45,359,472	
2016			**$ 599,912,181.00**			**$ 78,505,894**		**$ 521,406,288**	**$ -**
2017-01			$ 66,081,451.00			$8,969,770		$57,111,682	

2017-02			$ 54,756,071.00			$7,414,091		$47,341,981	
2017-03			$ 54,114,305.00			$7,225,026		$46,889,279	
2017-04			$ 46,650,243.00			$6,193,870		$40,456,373	
2017-05			$ 34,413,539.00			$4,433,224		$29,980,315	
2017-06			$ 36,719,864.00			$2,726,094		$33,993,770	
2017-07			$ 45,554,589.00			$514,671		$45,039,918	
2017-08			$ 45,731,789.00			$456,521		$45,275,267	
2017-09			$ 41,140,579.00			$372,713		$40,767,866	
2017-10			$ 36,736,596.00			$629,511		$36,107,085	
2017-11			$ 37,443,543.00			$443,197		$37,000,346	
2017-12			$ 52,947,949.00			$2,991,562		$49,956,387	
2017			**$ 552,290,518.00**			**$ 42,370,250**		**$509,920,267**	**$ -**
18-Jan	534,223	867,721,871	$ 73,401,616.61	$ 0.0846	$ 0.0100	$ 8,643,533	$ 0.0746	$ 64,758,083	$ 16.18
Feb-18	534,278	706,994,198	$ 60,075,291.93	$ 0.0850	$ 0.0103	$ 7,312,315	$ 0.0746	$ 52,762,977	$ 13.69
Mar-18	533,553	643,999,364	$ 55,031,201.41	$ 0.0855	$ 0.0108	$ 6,969,529	$ 0.0746	$ 48,061,673	$ 13.06
Apr-18	533,164	616,121,748	$ 51,566,014.65	$ 0.0837	$ 0.0091	$ 5,584,849	$ 0.0746	$ 45,981,166	$ 10.47
May-18	530,786	442,248,478	$ 38,866,818.94	$ 0.0879	$ 0.0133	$ 5,861,815	$ 0.0746	$ 33,005,004	$ 11.04
Jun-18	525,282	432,931,250	$ 37,370,488.43	$ 0.0863	$ 0.0118	$ 5,121,440	$ 0.0745	$ 32,249,049	$ 9.75
Jul-18	523,134	526,480,522	$ 45,211,763.54	$ 0.0859	$ 0.0114	$ 5,994,229	$ 0.0745	$ 39,217,534	$ 11.46
Aug-18	520,282	549,054,630	$ 47,270,208.94	$ 0.0861	$ 0.0116	$ 6,371,130	$ 0.0745	$ 40,899,079	$ 12.25
Sep-18	518,242	567,002,374	$ 48,578,922.84	$ 0.0857	$ 0.0112	$ 6,342,916	$ 0.0745	$ 42,236,007	$ 12.24
Oct-18	516,576	420,684,316	$ 35,964,271.04	$ 0.0855	$ 0.0110	$ 4,627,496	$ 0.0745	$ 31,336,775	$ 8.96
Nov-18	514,154	456,338,586	$ 38,727,356.99	$ 0.0849	$ 0.0104	$ 4,734,696	$ 0.0745	$ 33,992,661	$ 9.21
Dec-18	511,873	632,296,015	$ 53,384,857.50	$ 0.0844	$ 0.0140	$ 8,877,541	$ 0.0704	$ 44,507,316	$ 17.34
2018			**$ 585,448,812.82**			**$ 76,441,488**		**$ 509,007,324**	**$ 145.65**
Jan-19	506,736	721,809,960	$ 62,068,096.52	$ 0.0860	$ 0.0156	$ 11,259,893	$ 0.0704	$ 50,808,203	$ 22.22
Feb-19	504,280	732,624,230	$ 63,329,685.18	$ 0.0864	$ 0.0161	$ 11,760,266	$ 0.0704	$ 51,569,420	$ 23.32
Mar-19	501,463	630,052,090	$ 54,146,500.98	$ 0.0859	$ 0.0155	$ 9,797,134	$ 0.0704	$ 44,349,367	$ 19.54
Apr-19	497,908	494,040,718	$ 42,481,617.04	$ 0.0860	$ 0.0156	$ 7,706,091	$ 0.0704	$ 34,775,526	$ 15.48
May-19	495,442	396,902,822	$ 34,266,024.02	$ 0.0863	$ 0.0159	$ 6,328,034	$ 0.0704	$ 27,937,990	$ 12.77
Jun-19	493,040	398,877,155	$ 34,715,740.53	$ 0.0870	$ 0.0112	$ 4,460,908	$ 0.0759	$ 30,254,832	$ 9.05
Jul-19	490,211	502,452,521	$ 43,701,512.83	$ 0.0870	$ 0.0111	$ 5,590,489	$ 0.0759	$ 38,111,024	$ 11.40
Aug-19	488,379	546,165,701	$ 47,633,294.22	$ 0.0872	$ 0.0114	$ 6,206,626	$ 0.0759	$ 41,426,668	$ 12.71

Sep-19	486,174	457,681,176	$ 39,762,739.37	$ 0.0869	$ 0.0110	$ 5,047,622	$ 0.0759	$ 34,715,117	$ 10.38
Oct-19	484,657	388,926,671	$ 33,766,879.83	$ 0.0868	$ 0.0110	$ 4,266,792	$ 0.0759	$ 29,500,088	$ 8.80
Nov-19	482,612	400,781,345	$ 34,734,355.25	$ 0.0867	$ 0.0108	$ 4,335,090	$ 0.0759	$ 30,399,265	$ 8.98
Dec-19	481,391	572,295,038	$ 49,241,942.10	$ 0.0860	$ 0.0097	$ 5,564,385	$ 0.0763	$ 43,677,557	$ 11.56
2019			**$ 539,848,387.87**			**$ 82,323,331**		**$ 457,525,057**	**$ 166.22**
Jan-20	480,251	653,647,479	$ 56,386,415.07	$ 0.0863	$ 0.0099	$ 6,500,039	$ 0.0763	$ 49,886,376	$ 13.53
Feb-20	480,736	590,776,560	$ 51,205,506.67	$ 0.0867	$ 0.0104	$ 6,117,440	$ 0.0763	$ 45,088,067	$ 12.73
Mar-20	480,813	546,216,312	$ 46,958,088.12	$ 0.0860	$ 0.0096	$ 5,270,859	$ 0.0763	$ 41,687,229	$ 10.96
Apr-20	481,169	468,128,852	$ 40,166,709.81	$ 0.0858	$ 0.0095	$ 4,439,116	$ 0.0763	$ 35,727,594	$ 9.23
May-20	480,657	432,871,184	$ 36,987,714.19	$ 0.0854	$ 0.0091	$ 3,950,985	$ 0.0763	$ 33,036,729	$ 8.22
Jun-20	480,240	423,744,394	$ 36,050,355.82	$ 0.0851	$ 0.0122	$ 5,184,814	$ 0.0728	$ 30,865,542	$ 10.80
Jul-20	479,966	530,928,575	$ 45,137,897.16	$ 0.0850	$ 0.0122	$ 6,465,060	$ 0.0728	$ 38,672,837	$ 13.47
Aug-20	478,452	599,811,736	$ 50,883,294.97	$ 0.0848	$ 0.0120	$ 7,193,008	$ 0.0728	$ 43,690,287	$ 15.03
Sep-20	476,739	487,227,763	$ 41,256,863.58	$ 0.0847	$ 0.0118	$ 5,767,193	$ 0.0728	$ 35,489,670	$ 12.10
Oct-20	474,590	383,228,044	$ 32,490,238.73	$ 0.0848	$ 0.0119	$ 4,575,908	$ 0.0728	$ 27,914,331	$ 9.64
Nov-20	473,868	393,481,106	$ 33,310,642.24	$ 0.0847	$ 0.0118	$ 4,649,478	$ 0.0728	$ 28,661,164	$ 9.81
Dec-20	472,708	538,965,106	$ 45,496,076.31	$ 0.0844	$ 0.0112	$ 6,060,000	$ 0.0732	$ 39,436,077	$ 12.82
2020			**$ 516,329,802.67**			**$ 66,173,901**		**$ 450,155,902**	**$ 138.34**
Jan-21	470,425	686,898,370	$ 57,496,565.10	$ 0.0837	$ 0.0105	$ 7,236,211	$ 0.0732	$ 50,260,354	$ 15.38
Feb-21	469,637	688,307,936	$ 57,646,216.03	$ 0.0838	$ 0.0106	$ 7,282,724	$ 0.0732	$ 50,363,492	$ 15.51
Mar-21	467,574	605,278,851	$ 50,608,420.40	$ 0.0836	$ 0.0104	$ 6,320,167	$ 0.0732	$ 44,288,254	$ 13.52
Apr-21	465,965	437,766,853	$ 37,078,773.57	$ 0.0847	$ 0.0115	$ 5,047,373	$ 0.0732	$ 32,031,401	$ 10.83
May-21	462,103	361,822,958	$ 31,034,117.69	$ 0.0858	$ 0.0126	$ 4,559,532	$ 0.0732	$ 26,474,586	$ 9.87
Jun-21	458,293	417,144,163	$ 36,067,174.86	$ 0.0865	$ 0.0110	$ 4,597,819	$ 0.0754	$ 31,469,356	$ 10.03
Jul-21	453,842	497,222,570	$ 43,584,695.43	$ 0.0877	$ 0.0122	$ 6,074,225	$ 0.0754	$ 37,510,471	$ 13.38
Aug-21	450,154	477,319,856	$ 42,349,364.49	$ 0.0887	$ 0.0133	$ 6,340,355	$ 0.0754	$ 36,009,010	$ 14.08
Sep-21	443,629	466,511,152	$ 42,057,759.84	$ 0.0902	$ 0.0147	$ 6,864,159	$ 0.0754	$ 35,193,601	$ 15.47
Oct-21	436,873	341,812,736	$ 31,712,566.20	$ 0.0928	$ 0.0173	$ 5,926,213	$ 0.0754	$ 25,786,353	$ 13.57
Nov-21	435,133	363,124,322	$ 33,931,532.21	$ 0.0934	$ 0.0180	$ 6,537,433	$ 0.0754	$ 27,394,099	$ 15.02
Dec-21	433,109	500,388,401	$ 48,237,600.97	$ 0.0964	$ 0.0014	$ 690,695	$ 0.0950	$ 47,546,906	$ 1.59
2021			**$ 511,804,786.79**			**$ 67,476,906**		**$ 444,327,881**	**$ 148.26**
Jan-22	429,509	596,381,317	$ 59,015,133.24	$ 0.0990	$ 0.0039	$ 2,346,980	$ 0.0950	$ 56,668,153	$ 5.46
Feb-22	425,335	613,195,967	$ 61,519,863.19	$ 0.1003	$ 0.0053	$ 3,253,982	$ 0.0950	$ 58,265,881	$ 7.65

Mar-22	420,027	490,674,423	$ 49,575,900.52	$ 0.1010	$ 0.0060	$ 2,952,017	$ 0.0950	$ 46,623,884	$ 7.03
Apr-22	413,728	407,630,444	$ 41,838,279.88	$ 0.1026	$ 0.0076	$ 3,105,235	$ 0.0950	$ 38,733,045	$ 7.51
May-22	430,745	354,213,818	$ 37,125,852.21	$ 0.1048	$ 0.0098	$ 3,468,455	$ 0.0950	$ 33,657,397	$ 8.05
Jun-22	456,890	391,554,497	$ 41,820,966.38	$ 0.1068	$ (0.0169)	$ (6,598,663)	$ 0.1237	$ 48,419,629	$ (14.44)
Jul-22	451,457	461,284,498	$ 50,626,353.72	$ 0.1098	$ (0.0139)	$ (6,416,087)	$ 0.1237	$ 57,042,441	$ (14.21)
Aug-22	447,302	507,083,504	$ 57,354,074.11	$ 0.1131	$ (0.0106)	$ (5,351,872)	$ 0.1237	$ 62,705,946	$ (11.96)
Sep-22	443,277	455,112,956	$ 53,010,447.77	$ 0.1165	$ (0.0072)	$ (3,268,820)	$ 0.1237	$ 56,279,268	$ (7.37)
Oct-22	438,956	338,084,211	$ 40,687,942.13	$ 0.1203	$ (0.0033)	$ (1,119,551)	$ 0.1237	$ 41,807,494	$ (2.55)
Nov-22	441,716	350,342,152	$ 43,158,786.66	$ 0.1232	$ (0.0005)	$ (164,524)	$ 0.1237	$ 43,323,311	$ (0.37)
Dec-22	447,265	491,406,861	$ 62,000,894.39	$ 0.1262	$ (0.0199)	$ (9,803,476)	$ 0.1461	$ 71,804,371	$ (21.92)
2022			**$ 597,734,494.20**			**$ (17,596,324)**		**$ 615,330,818**	**$ (37.13)**
Jan-23	455,001	633,470,815	$ 81,031,370.69	$ 0.1279	$ (0.0182)	$ (11,531,385)	$ 0.1461	$ 92,562,755	$ (25.34)
Feb-23	472,276	480,177,824	$ 63,554,093.44	$ 0.1324	$ (0.0138)	$ (6,609,490)	$ 0.1461	$ 70,163,584	$ (13.99)
Mar-23	484,074	614,487,619	$ 77,031,254.69	$ 0.1254	$ (0.0208)	$ (12,757,676)	$ 0.1461	$ 89,788,931	$ (26.35)
Apr-23	489,851	485,854,008	$ 60,606,487.28	$ 0.1247	$ (0.0214)	$ (10,386,500)	$ 0.1461	$ 70,992,988	$ (21.20)
May-23	492,908	404,285,410	$ 49,790,262.42	$ 0.1232	$ (0.0230)	$ (9,283,922)	$ 0.1461	$ 59,074,184	$ (18.83)
Jun-23	494,948	394,264,880	$ 48,547,019.50	$ 0.1231	$ 0.0019	$ 738,460	$ 0.1213	$ 47,808,559	$ 1.49
Jul-23	495,737	482,087,495	$ 59,331,137.69	$ 0.1231	$ 0.0018	$ 873,208	$ 0.1213	$ 58,457,930	$ 1.76
Aug-23	497,248	526,353,275	$ 63,790,138.07	$ 0.1212	$ (0.0001)	$ (35,460)	$ 0.1213	$ 63,825,598	$ (0.07)
Sep-23	497,457	493,106,862	$ 59,515,373.94	$ 0.1207	$ (0.0006)	$ (278,764)	$ 0.1213	$ 59,794,138	$ (0.56)
Oct-23	498,504	392,751,191	$ 47,105,910.52	$ 0.1199	$ (0.0013)	$ (519,099)	$ 0.1213	$ 47,625,009	$ (1.04)
Nov-23	499,153	399,537,199	$ 47,542,539.98	$ 0.1190	$ (0.0023)	$ (905,341)	$ 0.1213	$ 48,447,881	$ (1.81)
Dec-23	499,588	587,820,070	$ 68,433,057.92	$ 0.1164	$ 0.0061	$ 3,608,261	$ 0.1103	$ 64,824,797	$ 7.22
2023			**$ 726,278,646.14**			**$ (47,087,708)**		**$ 773,366,354**	**$ (98.74)**
Jan-24	500,410	708,220,985	$ 81,577,667.99	$ 0.1152	$ 0.0049	$ 3,475,058	$ 0.1103	$ 78,102,610	$ 6.94
Feb-24	500,889	622,828,833	$ 71,037,863.47	$ 0.1141	$ 0.0038	$ 2,352,300	$ 0.1103	$ 68,685,564	$ 4.70
Mar-24	500,652	555,552,047	$ 63,438,856.52	$ 0.1142	$ 0.0039	$ 2,172,577	$ 0.1103	$ 61,266,280	$ 4.34
Apr-24	500,727	487,829,883	$ 55,649,890.54	$ 0.1141	$ 0.0038	$ 1,852,011	$ 0.1103	$ 53,797,879	$ 3.70
2023			**$ 271,704,278.52**			**$ 9,851,945**		**$ 146,788,174**	**$ 19.68**
TOTAL			**$ 5,558,437,370.01**			**$ 339,220,116**		**$ 5,104,153,093**	**$ 482.27**

*The data in this Exhibit for 2018 to date in 2024 was derived from data in CAUSE-PA to PPL I-1 (d), (e), (f), II-7 (d), (e), (f), and I-3. The data for 2015 through 2017 was derived from CAUSE-PA Exhibit 1, admitted to the record in PPL's DSP V proceeding.

CONFIRMED LOW INCOME (NON-CAP) RESIDENTIAL SHOPPING - PPL

January 2015 to April 2024

Date	CLI Shopping Customer Count	CLI Shopping Usage (kWh)	Total CLI Shopping Charges Billed	Avg $/kWh - CLI Shopping	Avg $/kWh Over Default Rate	Total CLI Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over PTC Per Shopping Customer
2015-01	61,972	102,131,986	$ 9,723,712.15	$ 0.0952	$ 0.0020	$ 207,457	$0.0932	$ 9,516,255	$ 3.35
2015-02	62,589	104,872,802	$ 10,030,847.52	$ 0.0956	$ 0.0025	$ 259,528	$0.0932	$ 9,771,320	$ 4.15
2015-03	62,889	113,162,810	$ 10,947,732.27	$ 0.0967	$ 0.0026	$ 291,293	$0.0942	$ 10,656,439	$ 4.63
2015-04	62,991	81,022,335	$ 7,766,695.16	$ 0.0959	$ 0.0003	$ 23,720	$0.0956	$ 7,742,976	$ 0.38
2015-05	62,243	53,389,610	$ 5,122,622.25	$ 0.0959	$ 0.0004	$ 19,564	$0.0956	$ 5,103,059	$ 0.31
2015-06	61,761	54,008,254	$ 5,216,682.70	$ 0.0966	$ 0.0013	$ 69,435	$0.0953	$ 5,147,248	$ 1.12
2015-07	61,022	59,242,958	$ 5,772,799.45	$ 0.0974	$ 0.0025	$ 149,773	$0.0949	$ 5,623,026	$ 2.45
2015-08	60,907	65,020,035	$ 6,370,378.53	$ 0.0980	$ 0.0030	$ 198,129	$0.0949	$ 6,172,250	$ 3.25
2015-09	60,973	60,178,545	$ 5,876,674.76	$ 0.0977	$ 0.0027	$ 164,007	$0.0949	$ 5,712,668	$ 2.69
2015-10	60,622	49,099,306	$ 4,780,962.18	$ 0.0974	$ 0.0024	$ 120,024	$0.0949	$ 4,660,938	$ 1.98
2015-11	60,325	54,846,878	$ 5,297,939.19	$ 0.0966	$ 0.0017	$ 91,493	$0.0949	$ 5,206,446	$ 1.52
2015-12	61,527	70,566,379	$ 6,787,441.66	$ 0.0962	$ 0.0081	$ 574,196	$0.0880	$ 6,213,246	$ 9.33
2015			**$ 83,694,487.82**			**$ 2,168,618**		**$ 81,525,870**	**$ 35.17**
2016-01	62,037	85,869,011	$ 8,273,499.36	$ 0.0964	$ 0.0174	$ 1,490,037	$0.0790	$ 6,783,462	$ 24.02
2016-02	62,189	96,847,009	$ 9,226,915.26	$ 0.0953	$ 0.0161	$ 1,556,575	$0.0792	$ 7,670,340	$ 25.03
2016-03	61,861	82,265,437	$ 7,777,118.32	$ 0.0945	$ 0.0153	$ 1,261,791	$0.0792	$ 6,515,328	$ 20.40
2016-04	61,053	62,763,466	$ 5,879,033.61	$ 0.0937	$ 0.0145	$ 908,725	$0.0792	$ 4,970,309	$ 14.88
2016-05	59,840	48,856,718	$ 4,548,935.46	$ 0.0931	$ 0.0139	$ 680,057	$0.0792	$ 3,868,879	$ 11.36
2016-06	58,785	51,499,182	$ 4,761,576.97	$ 0.0925	$ 0.0151	$ 778,244	$0.0773	$ 3,983,333	$ 13.24
2016-07	57,634	57,370,206	$ 5,263,713.32	$ 0.0917	$ 0.0168	$ 964,762	$0.0749	$ 4,298,951	$ 16.74
2016-08	57,391	63,994,610	$ 5,872,041.04	$ 0.0918	$ 0.0168	$ 1,078,247	$0.0749	$ 4,793,794	$ 18.79
2016-09	57,096	60,723,761	$ 5,557,130.12	$ 0.0915	$ 0.0166	$ 1,008,566	$0.0749	$ 4,548,564	$ 17.66
2016-10	56,928	45,577,232	$ 4,156,340.76	$ 0.0912	$ 0.0163	$ 742,428	$0.0749	$ 3,413,913	$ 13.04
2016-11	56,856	51,749,901	$ 4,681,698.15	$ 0.0905	$ 0.0156	$ 805,422	$0.0749	$ 3,876,276	$ 14.17
2016-12	57,412	70,428,496	$ 6,322,143.23	$ 0.0898	$ 0.0151	$ 1,061,915	$0.0747	$ 5,260,228	$ 18.50
2016			**$ 72,320,145.60**			**$ 12,336,768**		**$ 59,983,377**	**$ 207.83**
2017-01	59,249	92,673,663	$ 8,331,221.50	$ 0.0899	$ 0.0155	$ 1,436,964	$0.0744	$ 6,894,258	$ 24.25
2017-02	60,028	79,901,479	$ 7,205,206.92	$ 0.0902	$ 0.0158	$ 1,260,796	$0.0744	$ 5,944,411	$ 21.00
2017-03	61,361	80,430,524	$ 7,262,275.12	$ 0.0903	$ 0.0159	$ 1,279,035	$0.0744	$ 5,983,240	$ 20.84
2017-04	59,943	67,427,995	$ 6,069,377.72	$ 0.0900	$ 0.0156	$ 1,053,378	$0.0744	$ 5,016,000	$ 17.57

2017-05	59,398	47,116,341	$ 4,248,117.21	$ 0.0902	$ 0.0158	$ 742,819	$0.0744	$ 3,505,299	$ 12.51
2017-06	59,670	48,324,828	$ 4,376,014.69	$ 0.0906	$ 0.0120	$ 580,336	$0.0785	$ 3,795,678	$ 9.73
2017-07	59,696	58,833,429	$ 5,346,175.01	$ 0.0909	$ 0.0061	$ 360,857	$0.0847	$ 4,985,318	$ 6.04
2017-08	60,074	59,345,167	$ 5,404,293.78	$ 0.0911	$ 0.0062	$ 366,819	$0.0849	$ 5,037,474	$ 6.11
2017-09	59,603	53,844,315	$ 4,904,576.32	$ 0.0911	$ 0.0062	$ 334,720	$0.0849	$ 4,569,856	$ 5.62
2017-10	59,517	47,826,794	$ 4,401,951.82	$ 0.0920	$ 0.0071	$ 341,432	$0.0849	$ 4,060,520	$ 5.74
2017-11	59,390	51,215,918	$ 4,665,934.80	$ 0.0911	$ 0.0062	$ 317,776	$0.0849	$ 4,348,159	$ 5.35
2017-12	59,705	76,143,372	$ 6,877,243.89	$ 0.0903	$ 0.0093	$ 710,983	$0.0810	$ 6,166,261	$ 11.91
2017			**$ 69,092,388.78**			**$ 8,785,914**		**$ 60,306,475**	**$ 146.67**
18-Jan	60,155	106,244,164	$ 9,540,993.37	$ 0.0898	$ 0.0152	$ 1,611,991	$ 0.0746	$ 7,929,002	$ 26.80
Feb-18	61,072	90,160,281	$ 8,176,322.72	$ 0.0907	$ 0.0161	$ 1,447,661	$ 0.0746	$ 6,728,662	$ 23.70
Mar-18	60,597	81,689,393	$ 7,435,257.10	$ 0.0910	$ 0.0164	$ 1,338,778	$ 0.0746	$ 6,096,479	$ 22.09
Apr-18	59,465	76,660,367	$ 6,771,259.73	$ 0.0883	$ 0.0137	$ 1,050,097	$ 0.0746	$ 5,721,163	$ 17.66
May-18	58,691	52,853,464	$ 4,952,580.97	$ 0.0937	$ 0.0191	$ 1,008,127	$ 0.0746	$ 3,944,454	$ 17.18
Jun-18	57,866	47,853,916	$ 4,375,523.00	$ 0.0914	$ 0.0169	$ 810,885	$ 0.0745	$ 3,564,638	$ 14.01
Jul-18	56,971	57,140,180	$ 5,202,549.69	$ 0.0910	$ 0.0166	$ 946,178	$ 0.0745	$ 4,256,372	$ 16.61
Aug-18	56,406	59,396,251	$ 5,413,031.67	$ 0.0911	$ 0.0166	$ 988,605	$ 0.0745	$ 4,424,427	$ 17.53
Sep-18	55,806	60,889,675	$ 5,513,012.86	$ 0.0905	$ 0.0161	$ 977,341	$ 0.0745	$ 4,535,672	$ 17.51
Oct-18	55,347	45,616,595	$ 4,125,464.91	$ 0.0904	$ 0.0159	$ 727,485	$ 0.0745	$ 3,397,980	$ 13.14
Nov-18	55,230	52,786,627	$ 4,722,880.62	$ 0.0895	$ 0.0150	$ 790,805	$ 0.0745	$ 3,932,076	$ 14.32
Dec-18	56,079	76,563,394	$ 6,821,184.37	$ 0.0891	$ 0.0187	$ 1,431,887	$ 0.0704	$ 5,389,297	$ 25.53
2018			**$ 73,050,061.01**			**$ 13,129,839**		**$ 59,920,222**	**$ 226.09**
Jan-19	56,504	88,769,944	$ 8,046,527.53	$ 0.0906	$ 0.0203	$ 1,798,011	$ 0.0704	$ 6,248,516	$ 31.82
Feb-19	56,475	90,812,136	$ 8,331,137.33	$ 0.0917	$ 0.0214	$ 1,938,871	$ 0.0704	$ 6,392,266	$ 34.33
Mar-19	55,979	78,701,387	$ 7,165,883.11	$ 0.0911	$ 0.0207	$ 1,626,092	$ 0.0704	$ 5,539,791	$ 29.05
Apr-19	54,452	59,751,014	$ 5,439,475.79	$ 0.0910	$ 0.0206	$ 1,233,602	$ 0.0704	$ 4,205,874	$ 22.65
May-19	53,408	44,922,454	$ 4,124,733.71	$ 0.0918	$ 0.0214	$ 962,642	$ 0.0704	$ 3,162,092	$ 18.02
Jun-19	52,881	42,574,839	$ 3,965,983.47	$ 0.0932	$ 0.0173	$ 736,682	$ 0.0759	$ 3,229,302	$ 13.93
Jul-19	52,396	52,934,186	$ 4,919,303.15	$ 0.0929	$ 0.0171	$ 904,245	$ 0.0759	$ 4,015,058	$ 17.26
Aug-19	51,914	57,671,613	$ 5,375,887.25	$ 0.0932	$ 0.0174	$ 1,001,495	$ 0.0759	$ 4,374,392	$ 19.29
Sep-19	51,473	48,247,497	$ 4,497,183.81	$ 0.0932	$ 0.0174	$ 837,611	$ 0.0759	$ 3,659,573	$ 16.27
Oct-19	50,974	41,528,696	$ 3,886,722.38	$ 0.0936	$ 0.0177	$ 736,771	$ 0.0759	$ 3,149,952	$ 14.45
Nov-19	50,519	44,970,942	$ 4,195,213.14	$ 0.0933	$ 0.0174	$ 784,167	$ 0.0759	$ 3,411,046	$ 15.52
Dec-19	50,884	66,489,437	$ 6,140,740.17	$ 0.0924	$ 0.0160	$ 1,066,266	$ 0.0763	$ 5,074,474	$ 20.95
2019			**$ 66,088,790.84**			**$ 13,626,457**		**$ 52,462,334**	**$ 253.56**
Jan-20	51,544	76,698,914	$ 7,103,150.85	$ 0.0926	$ 0.0163	$ 1,249,490	$ 0.0763	$ 5,853,661	$ 24.24
Feb-20	51,924	70,783,678	$ 6,612,104.40	$ 0.0934	$ 0.0171	$ 1,209,894	$ 0.0763	$ 5,402,210	$ 23.30
Mar-20	51,987	65,534,445	$ 6,089,486.04	$ 0.0929	$ 0.0166	$ 1,087,897	$ 0.0763	$ 5,001,589	$ 20.93
Apr-20	51,806	55,112,678	$ 5,122,259.86	$ 0.0929	$ 0.0166	$ 916,060	$ 0.0763	$ 4,206,200	$ 17.68

May-20	51,539	49,849,895	$ 4,630,162.60	$ 0.0929	$ 0.0166	$ 825,619	$ 0.0763	$ 3,804,544	$ 16.02
Jun-20	51,197	45,773,746	$ 4,242,940.23	$ 0.0927	$ 0.0199	$ 908,781	$ 0.0728	$ 3,334,160	$ 17.75
Jul-20	50,865	55,829,374	$ 5,160,816.56	$ 0.0924	$ 0.0196	$ 1,094,205	$ 0.0728	$ 4,066,612	$ 21.51
Aug-20	50,368	62,714,136	$ 5,800,706.91	$ 0.0925	$ 0.0197	$ 1,232,609	$ 0.0728	$ 4,568,098	$ 24.47
Sep-20	49,822	50,861,959	$ 4,734,116.52	$ 0.0931	$ 0.0202	$ 1,029,331	$ 0.0728	$ 3,704,785	$ 20.66
Oct-20	49,909	41,271,223	$ 3,853,587.63	$ 0.0934	$ 0.0205	$ 847,392	$ 0.0728	$ 3,006,196	$ 16.98
Nov-20	50,662	44,310,982	$ 4,119,852.07	$ 0.0930	$ 0.0201	$ 892,240	$ 0.0728	$ 3,227,612	$ 17.61
Dec-20	51,372	62,872,947	$ 5,799,558.78	$ 0.0922	$ 0.0191	$ 1,199,145	$ 0.0732	$ 4,600,414	$ 23.34
2020			**$ 63,268,742.45**			**$ 12,492,663**		**$ 50,776,079**	**$ 244.50**
Jan-21	52,177	82,120,634	$ 7,487,542.59	$ 0.0912	$ 0.0180	$ 1,478,776	$ 0.0732	$ 6,008,767	$ 28.34
Feb-21	52,765	84,454,863	$ 7,703,471.40	$ 0.0912	$ 0.0180	$ 1,523,909	$ 0.0732	$ 6,179,562	$ 28.88
Mar-21	52,927	75,616,279	$ 6,882,469.13	$ 0.0910	$ 0.0178	$ 1,349,626	$ 0.0732	$ 5,532,843	$ 25.50
Apr-21	52,703	53,304,649	$ 4,922,529.35	$ 0.0923	$ 0.0192	$ 1,022,228	$ 0.0732	$ 3,900,301	$ 19.40
May-21	52,027	42,600,424	$ 3,995,239.74	$ 0.0938	$ 0.0206	$ 878,167	$ 0.0732	$ 3,117,073	$ 16.88
Jun-21	51,767	47,330,007	$ 4,461,679.74	$ 0.0943	$ 0.0188	$ 891,104	$ 0.0754	$ 3,570,576	$ 17.21
Jul-21	51,485	56,245,538	$ 5,349,596.32	$ 0.0951	$ 0.0197	$ 1,106,433	$ 0.0754	$ 4,243,163	$ 21.49
Aug-21	51,457	54,534,152	$ 5,260,792.73	$ 0.0965	$ 0.0210	$ 1,146,736	$ 0.0754	$ 4,114,056	$ 22.29
Sep-21	51,319	53,928,876	$ 5,278,596.26	$ 0.0979	$ 0.0224	$ 1,210,202	$ 0.0754	$ 4,068,394	$ 23.58
Oct-21	51,179	40,633,750	$ 4,133,903.43	$ 0.1017	$ 0.0263	$ 1,068,493	$ 0.0754	$ 3,065,410	$ 20.88
Nov-21	51,491	45,966,152	$ 4,654,170.35	$ 0.1013	$ 0.0258	$ 1,186,484	$ 0.0754	$ 3,467,687	$ 23.04
Dec-21	51,762	66,399,045	$ 6,913,919.99	$ 0.1041	$ 0.0091	$ 604,683	$ 0.0950	$ 6,309,237	$ 11.68
2021			**$ 67,043,911.03**			**$ 13,466,841**		**$ 53,577,070**	**$ 259.17**
Jan-22	52,096	80,030,023	$ 8,576,553.84	$ 0.1072	$ 0.0121	$ 972,101	$ 0.0950	$ 7,604,453	$ 18.66
Feb-22	52,420	84,644,283	$ 9,196,814.51	$ 0.1087	$ 0.0136	$ 1,153,915	$ 0.0950	$ 8,042,900	$ 22.01
Mar-22	52,307	69,105,289	$ 7,549,081.00	$ 0.1092	$ 0.0142	$ 982,696	$ 0.0950	$ 6,566,385	$ 18.79
Apr-22	51,369	56,675,322	$ 6,308,096.45	$ 0.1113	$ 0.0163	$ 922,807	$ 0.0950	$ 5,385,289	$ 17.96
May-22	52,908	47,103,525	$ 5,353,023.26	$ 0.1136	$ 0.0186	$ 877,246	$ 0.0950	$ 4,475,777	$ 16.58
Jun-22	55,400	48,429,855	$ 5,648,352.94	$ 0.1166	$ (0.0070)	$ (340,483)	$ 0.1237	$ 5,988,836	$ (6.15)
Jul-22	54,815	56,667,776	$ 6,837,023.95	$ 0.1207	$ (0.0030)	$ (170,513)	$ 0.1237	$ 7,007,537	$ (3.11)
Aug-22	54,445	62,318,961	$ 7,738,636.80	$ 0.1242	$ 0.0005	$ 32,274	$ 0.1237	$ 7,706,363	$ 0.59
Sep-22	53,824	56,243,393	$ 7,226,513.29	$ 0.1285	$ 0.0048	$ 271,455	$ 0.1237	$ 6,955,058	$ 5.04
Oct-22	53,593	43,304,968	$ 5,791,281.72	$ 0.1337	$ 0.0101	$ 436,189	$ 0.1237	$ 5,355,092	$ 8.14
Nov-22	53,943	46,723,964	$ 6,355,506.05	$ 0.1360	$ 0.0124	$ 577,621	$ 0.1237	$ 5,777,885	$ 10.71
Dec-22	55,210	68,012,526	$ 9,357,136.01	$ 0.1376	$ (0.0085)	$ (580,854)	$ 0.1461	$ 9,937,990	$ (10.52)
2022			**$ 85,938,019.82**			**$ 5,134,455**		**$ 80,803,565**	**$ 98.71**
Jan-23	56,780	89,717,953	$ 12,455,517.31	$ 0.1388	$ (0.0073)	$ (654,070)	$ 0.1461	$ 13,109,587	$ (11.52)
Feb-23	58,983	70,920,112	$ 10,097,139.11	$ 0.1424	$ (0.0037)	$ (265,708)	$ 0.1461	$ 10,362,847	$ (4.50)
Mar-23	60,739	86,503,124	$ 11,838,094.79	$ 0.1369	$ (0.0093)	$ (801,742)	$ 0.1461	$ 12,639,836	$ (13.20)
Apr-23	61,652	69,761,232	$ 9,472,505.42	$ 0.1358	$ (0.0103)	$ (721,006)	$ 0.1461	$ 10,193,511	$ (11.69)

May-23	62,235	55,813,710	$ 7,470,993.58	$ 0.1339	$ (0.0123)	$ (684,506)	$ 0.1461	$ 8,155,499	$ (11.00)
Jun-23	62,631	52,029,853	$ 6,966,600.45	$ 0.1339	$ 0.0126	$ 657,460	$ 0.1213	$ 6,309,140	$ 10.50
Jul-23	63,190	63,199,505	$ 8,392,196.83	$ 0.1328	$ 0.0115	$ 728,625	$ 0.1213	$ 7,663,572	$ 11.53
Aug-23	62,955	68,562,855	$ 8,949,462.81	$ 0.1305	$ 0.0093	$ 635,531	$ 0.1213	$ 8,313,932	$ 10.10
Sep-23	63,069	64,328,238	$ 8,349,300.31	$ 0.1298	$ 0.0085	$ 548,858	$ 0.1213	$ 7,800,442	$ 8.70
Oct-23	63,523	52,843,156	$ 6,842,642.04	$ 0.1295	$ 0.0082	$ 434,881	$ 0.1213	$ 6,407,761	$ 6.85
Nov-23	63,824	56,180,337	$ 7,161,706.90	$ 0.1275	$ 0.0062	$ 349,279	$ 0.1213	$ 6,812,428	$ 5.47
Dec-23	64,632	86,253,230	$ 10,653,654.98	$ 0.1235	$ 0.0132	$ 1,141,649	$ 0.1103	$ 9,512,006	$ 17.66
2023			**$ 108,649,814.53**			**$ 1,369,253**		**$ 107,280,562**	**$ 18.89**
Jan-24	65,665	105,451,587	$ 12,882,345.28	$ 0.1222	$ 0.0119	$ 1,253,144	$ 0.1103	$ 11,629,201	$ 19.08
Feb-24	66,238	95,055,821	$ 11,546,412.30	$ 0.1215	$ 0.0112	$ 1,063,656	$ 0.1103	$ 10,482,756	$ 16.06
Mar-24	66,618	85,388,309	$ 10,390,916.02	$ 0.1217	$ 0.0114	$ 974,293	$ 0.1103	$ 9,416,623	$ 14.63
Apr-24	66,598	73,822,318	$ 8,982,548.22	$ 0.1217	$ 0.0114	$ 841,423	$ 0.1103	$ 8,141,125	$ 12.63
2024			**$ 43,802,221.82**			**$ 4,132,517**		**$ 39,669,705**	**$ 62.40**
TOTAL			**$ 671,118,470.04**			**$ 86,643,324**		**$ 646,305,259**	**$ 1,163.32**

*The data in this Exhibit for 2018 through 2024 was derived from data in CAUSE-PA to PPL I-1(s), (t), (u), II-7(s), (t), (u), and I-3. Data for 2015 through 2017 was derived from CAUSE-PA Exhibit 2, admitted to the record in PPL's DSP V proceeding.

CAUSE-PA Statement 1
Appendix A
Resume - Harry S. Geller, Esq.

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:
Harpur College, State University of New York at Binghamton, B.A. 1966
Washington College of Law, American University, J.D. 1969
New York University Law School, courses in Urban Affairs and Poverty Law, as part of Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:
1988 – 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS
New York State
Commonwealth of Pennsylvania
United States District Court, Middle District of Pennsylvania

Cases in which Harry S. Geller has participated as a witness before the Pennsylvania Public Utility Commission since July 1, 2015

- Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2022-3034229, P- 2022-3034264
- Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation, R-2022-3035730
- Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No.
- R-2022-3031211
- Pennsylvania Public Utility Commission v. Pa. American Water Co., Docket Nos.
- R-2022-3031672 & -3031673
- Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division, R-2021- 3030218.
- Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the Period Commencing June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385, R- 2021-3027386.
- Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021- 3024750.
- Pennsylvania Public Utility Commission v. PECO Energy – Electric Division, R-2021-3024601.
- Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
- Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
- Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31 , 2025, Docket No. P-2020-3019356.
- Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
- Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
- Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R2018-3003558 et seq.

- Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
- Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
- Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
- Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.
- PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
- Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
- Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.
- Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company,
- Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.
- Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.
- Pa. PUC v. PGW, Docket No. R-2023-3037933.
- Pa. PUC v. PWSA, Docket Nos. R-2023-3039920; R-2023-3039921; R-2023-3039919

CAUSE-PA Statement 1

Appendix B

Cited Responses to Interrogatories

Interrogatories of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania to PPL Electric

CAUSE-PA to PPL I-1 (with attachment)
CAUSE-PA to PPL I-2
CAUSE-PA to PPL I-3 (with attachment)
CAUSE-PA to PPL I-10 (with attachment)
CAUSE-PA to PPL I-12
CAUSE-PA to PPL II-2 (with attachments)
CAUSE-PA to PPL II-7 (with attachment)
CAUSE-PA to PPL II-11 (with attachment)

Interrogatories of the Office of Consumer Advocate to PPL Electric

OCA to PPL I-14
OCA to PPL I-32

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set I Interrogatories and Requests for Documents of
The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated March 18, 2024
Docket No. P-2024-3047290

CAUSE-PA I-1 In a live Excel spreadsheet, please provide the following for January 2018 to date, disaggregated by month and by year:

(a) The total number of residential customers.
(b) The total usage of residential customers
(c) The total amount billed for generation supply charges for residential customers.
(d) The total number of residential shopping customers.
(e) The total usage of residential shopping customers.
(f) The total amount billed for generation supply charges for residential shopping customers.
(g) The total number of residential default service customers.
(h) The total usage of residential default service customers.
(i) The total amount billed for generation supply charges for residential default service customers.
(j) The total number of CLI customers
(k) The total usage of CLI customers.
(l) The total amount billed for generation supply charges for all CLI customers.
(m) The total number of CLI customers who are not enrolled in PPL's Customer Assistance Program, OnTrack (hereinafter "CAP" or "OnTrack").
(n) The total usage of all non-CAP CLI customers.
(o) The total amount billed for generation supply charges for all non-CAP CLI customers.
(p) The total number of all CAP customers
(q) The total usage of all CAP customers
(r) The total amount billed for generation supply charges for all CAP customers before CAP credit was applied.
(s) The total number of residential non-CAP CLI shopping customers.
(t) The total usage of residential non-CAP CLI shopping customers.
(u) The total amount billed for generation supply charges for non-CAP CLI shopping customers.

WITNESS: Melinda Stumpf

(v) The total number of residential, non-CAP, default service CLI customers.
(w) The total usage of residential, non-CAP, default service CLI customers.
(x) The total amount billed for generation supply charges for non-CAP default service CLI customers.

PPL Response

See CAUSE-PA I-1 Attachment 1.

(a) The total number of residential customers.

Month	Count
2018-01	1,263,328
2018-02	1,262,540
2018-03	1,266,387
2018-04	1,269,432
2018-05	1,271,404
2018-06	1,272,034
2018-07	1,272,427
2018-08	1,274,252
2018-09	1,270,151
2018-10	1,273,264
2018-11	1,270,709
2018-12	1,268,627
2019-01	1,269,164
2019-02	1,268,389
2019-03	1,273,581
2019-04	1,275,400
2019-05	1,278,358
2019-06	1,277,823
2019-07	1,279,590
2019-08	1,280,555
2019-09	1,277,251
2019-10	1,277,821
2019-11	1,276,133
2019-12	1,276,000
2020-01	1,274,169
2020-02	1,274,526
2020-03	1,276,988
2020-04	1,272,373
2020-05	1,275,190
2020-06	1,279,646
2020-07	1,282,866
2020-08	1,284,086
2020-09	1,284,405
2020-10	1,284,938
2020-11	1,283,315
2020-12	1,283,589
2021-01	1,282,013
2021-02	1,281,852
2021-03	1,285,456
2021-04	1,285,591
2021-05	1,288,022
2021-06	1,292,924

Business Use

2021-07	1,289,819
2021-08	1,291,441
2021-09	1,288,275
2021-10	1,289,012
2021-11	1,289,295
2021-12	1,288,530
2022-01	1,287,934
2022-02	1,286,539
2022-03	1,289,830
2022-04	1,291,647
2022-05	1,294,937
2022-06	1,296,405
2022-07	1,294,823
2022-08	1,297,799
2022-09	1,295,226
2022-10	1,295,838
2022-11	1,294,713
2022-12	1,293,784
2023-01	1,298,457
2023-02	1,300,121
2023-03	1,299,586
2023-04	1,295,962
2023-05	1,301,055
2023-06	1,302,017
2023-07	1,302,500
2023-08	1,305,509
2023-09	1,302,379
2023-10	1,302,715
2023-11	1,300,796
2023-12	1,299,339
2024-01	1,298,940
2024-02	1,297,393

Business Use

(b) The total usage of residential customers

Month	Usage (kWh)
2018-01	1,817,113,492
2018-02	1,493,538,664
2018-03	1,364,207,593
2018-04	1,303,107,908
2018-05	941,500,385
2018-06	933,155,898
2018-07	1,144,585,635
2018-08	1,202,966,200
2018-09	1,247,340,916
2018-10	925,224,797
2018-11	1,009,311,558
2018-12	1,405,040,225
2019-01	1,625,861,844
2019-02	1,658,619,611
2019-03	1,443,155,875
2019-04	1,142,963,703
2019-05	917,758,703
2019-06	919,279,254
2019-07	1,167,749,064
2019-08	1,277,551,513
2019-09	1,073,524,557
2019-10	914,511,044
2019-11	954,494,735
2019-12	1,372,481,399
2020-01	1,566,054,363
2020-02	1,421,792,660
2020-03	1,312,032,419
2020-04	1,123,451,721
2020-05	1,037,519,892
2020-06	1,011,112,841
2020-07	1,272,621,033
2020-08	1,446,313,124
2020-09	1,177,775,476
2020-10	928,325,222
2020-11	958,450,931
2020-12	1,317,416,390
2021-01	1,687,332,938
2021-02	1,708,218,087
2021-03	1,485,883,686
2021-04	1,085,567,788
2021-05	904,883,516
2021-06	1,044,169,805

Business Use

2021-07	1,263,776,291
2021-08	1,225,716,041
2021-09	1,219,479,534
2021-10	906,400,977
2021-11	974,005,388
2021-12	1,359,127,056
2022-01	1,635,314,826
2022-02	1,709,466,012
2022-03	1,378,172,754
2022-04	1,168,702,938
2022-05	965,466,051
2022-06	997,817,875
2022-07	1,176,463,272
2022-08	1,310,580,176
2022-09	1,183,553,090
2022-10	894,583,206
2022-11	928,699,794
2022-12	1,325,174,518
2023-01	1,622,749,668
2023-02	1,326,294,235
2023-03	1,413,210,672
2023-04	1,135,014,682
2023-05	909,458,894
2023-06	896,599,913
2023-07	1,108,918,004
2023-08	1,209,320,847
2023-09	1,127,222,901
2023-10	894,571,124
2023-11	921,455,471
2023-12	1,361,583,936
2024-01	1,634,840,602
2024-02	1,446,806,504

Business Use

(c) The total amount billed for generation supply charges for residential customers.

Month	Dollars
2018-01	$ 144,694,356.86
2018-02	$ 119,081,097.03
2018-03	$ 108,997,918.43
2018-04	$ 103,041,124.56
2018-05	$ 76,332,893.40
2018-06	$ 74,919,970.77
2018-07	$ 91,490,136.65
2018-08	$ 96,216,144.41
2018-09	$ 99,453,438.34
2018-10	$ 73,682,503.36
2018-11	$ 80,049,427.79
2018-12	$ 110,031,513.59
2019-01	$ 126,223,347.98
2019-02	$ 128,933,364.05
2019-03	$ 111,763,294.08
2019-04	$ 88,432,752.87
2019-05	$ 71,110,584.79
2019-06	$ 72,712,799.48
2019-07	$ 94,338,107.87
2019-08	$ 103,312,141.35
2019-09	$ 86,616,788.93
2019-10	$ 73,764,401.96
2019-11	$ 76,844,847.80
2019-12	$ 110,271,367.81
2020-01	$ 126,262,202.60
2020-02	$ 114,819,428.88
2020-03	$ 105,570,413.20
2020-04	$ 90,311,569.47
2020-05	$ 83,255,346.17
2020-06	$ 80,142,409.99
2020-07	$ 99,304,477.97
2020-08	$ 112,710,307.64
2020-09	$ 91,697,550.19
2020-10	$ 72,308,503.42
2020-11	$ 74,557,328.65
2020-12	$ 102,431,755.30
2021-01	$ 130,914,732.60
2021-02	$ 132,489,004.94
2021-03	$ 115,265,769.38
2021-04	$ 84,600,871.77
2021-05	$ 70,889,104.37
2021-06	$ 82,819,847.86

Business Use

2021-07	$	101,577,451.66
2021-08	$	98,991,597.99
2021-09	$	99,075,610.64
2021-10	$	74,486,665.57
2021-11	$	80,210,003.96
2021-12	$	120,550,905.27
2022-01	$	155,155,463.78
2022-02	$	160,000,993.21
2022-03	$	129,300,817.05
2022-04	$	110,145,398.11
2022-05	$	91,973,102.80
2022-06	$	105,075,752.81
2022-07	$	139,088,051.13
2022-08	$	156,940,340.44
2022-09	$	143,311,130.45
2022-10	$	109,645,862.41
2022-11	$	114,818,870.53
2022-12	$	172,469,365.55
2023-01	$	225,581,266.70
2023-02	$	187,309,239.30
2023-03	$	193,816,507.29
2023-04	$	155,512,278.79
2023-05	$	123,597,608.36
2023-06	$	117,079,535.74
2023-07	$	135,623,867.01
2023-08	$	146,847,956.89
2023-09	$	136,592,038.59
2023-10	$	108,063,452.02
2023-11	$	110,926,854.59
2023-12	$	159,277,371.62
2024-01	$	184,049,728.70
2024-02	$	162,138,156.56

Business Use

(d) The total number of residential shopping customers.

Month	Count
2018-01	534,223
2018-02	534,278
2018-03	533,553
2018-04	533,164
2018-05	530,786
2018-06	525,282
2018-07	523,134
2018-08	520,282
2018-09	518,242
2018-10	516,576
2018-11	514,154
2018-12	511,873
2019-01	506,736
2019-02	504,280
2019-03	501,463
2019-04	497,908
2019-05	495,442
2019-06	493,040
2019-07	490,211
2019-08	488,379
2019-09	486,174
2019-10	484,657
2019-11	482,612
2019-12	481,391
2020-01	480,251
2020-02	480,736
2020-03	480,813
2020-04	481,169
2020-05	480,657
2020-06	480,240
2020-07	479,966
2020-08	478,452
2020-09	476,739
2020-10	474,590
2020-11	473,868
2020-12	472,708
2021-01	470,425
2021-02	469,637
2021-03	467,574
2021-04	465,965
2021-05	462,103
2021-06	458,293

Business Use

2021-07	453,842
2021-08	450,154
2021-09	443,629
2021-10	436,873
2021-11	435,133
2021-12	433,109
2022-01	429,509
2022-02	425,335
2022-03	420,027
2022-04	413,728
2022-05	430,745
2022-06	456,890
2022-07	451,457
2022-08	447,302
2022-09	443,277
2022-10	438,956
2022-11	441,716
2022-12	447,265
2023-01	455,001
2023-02	472,276
2023-03	484,074
2023-04	489,851
2023-05	492,908
2023-06	494,948
2023-07	495,737
2023-08	497,248
2023-09	497,457
2023-10	498,504
2023-11	499,153
2023-12	499,588
2024-01	500,410
2024-02	500,889

Business Use

(e) The total usage of residential shopping customers.

Month	Usage (kWh)
2018-01	867,721,871
2018-02	706,994,198
2018-03	643,999,364
2018-04	616,121,748
2018-05	442,248,478
2018-06	432,931,250
2018-07	526,480,522
2018-08	549,054,630
2018-09	567,002,374
2018-10	420,684,316
2018-11	456,338,586
2018-12	632,296,015
2019-01	721,809,960
2019-02	732,624,230
2019-03	630,052,090
2019-04	494,040,718
2019-05	396,902,822
2019-06	398,877,155
2019-07	502,452,521
2019-08	546,165,701
2019-09	457,681,176
2019-10	388,926,671
2019-11	400,781,345
2019-12	572,295,038
2020-01	653,647,479
2020-02	590,776,560
2020-03	546,216,312
2020-04	468,128,852
2020-05	432,871,184
2020-06	423,744,394
2020-07	530,928,575
2020-08	599,811,736
2020-09	487,227,763
2020-10	383,228,044
2020-11	393,481,106
2020-12	538,965,106
2021-01	686,898,370
2021-02	688,307,936
2021-03	605,278,851
2021-04	437,766,853
2021-05	361,822,958
2021-06	417,144,163

Business Use

2021-07	497,222,570
2021-08	477,319,856
2021-09	466,511,152
2021-10	341,812,736
2021-11	363,124,322
2021-12	500,388,401
2022-01	596,381,317
2022-02	613,195,967
2022-03	490,674,423
2022-04	407,630,444
2022-05	354,213,818
2022-06	391,554,497
2022-07	461,284,498
2022-08	507,083,504
2022-09	455,112,956
2022-10	338,084,211
2022-11	350,342,152
2022-12	491,406,861
2023-01	633,470,815
2023-02	480,177,824
2023-03	614,487,619
2023-04	485,854,008
2023-05	404,285,410
2023-06	394,264,880
2023-07	482,087,495
2023-08	526,353,275
2023-09	493,106,862
2023-10	392,751,191
2023-11	399,537,199
2023-12	587,820,070
2024-01	708,220,985
2024-02	622,828,833

Business Use

(f) The total amount billed for generation supply charges for residential shopping customers.

Month		Dollars
2018-01	$	73,401,616.61
2018-02	$	60,075,291.93
2018-03	$	55,031,201.41
2018-04	$	51,566,014.65
2018-05	$	38,866,818.94
2018-06	$	37,370,488.43
2018-07	$	45,211,763.54
2018-08	$	47,270,208.94
2018-09	$	48,578,922.84
2018-10	$	35,964,271.04
2018-11	$	38,727,356.99
2018-12	$	53,384,857.50
2019-01	$	62,068,096.52
2019-02	$	63,329,685.18
2019-03	$	54,146,500.98
2019-04	$	42,481,617.04
2019-05	$	34,266,024.02
2019-06	$	34,715,740.53
2019-07	$	43,701,512.83
2019-08	$	47,633,294.22
2019-09	$	39,762,739.37
2019-10	$	33,766,879.83
2019-11	$	34,734,355.25
2019-12	$	49,241,942.10
2020-01	$	56,386,415.07
2020-02	$	51,205,506.67
2020-03	$	46,958,088.12
2020-04	$	40,166,709.81
2020-05	$	36,987,714.19
2020-06	$	36,050,355.82
2020-07	$	45,137,897.16
2020-08	$	50,883,294.97
2020-09	$	41,256,863.58
2020-10	$	32,490,238.73
2020-11	$	33,310,642.24
2020-12	$	45,496,076.31
2021-01	$	57,496,565.10
2021-02	$	57,646,216.03
2021-03	$	50,608,420.40
2021-04	$	37,078,773.57
2021-05	$	31,034,117.69
2021-06	$	36,067,174.86

Business Use

2021-07	$	43,584,695.43
2021-08	$	42,349,364.49
2021-09	$	42,057,759.84
2021-10	$	31,712,566.20
2021-11	$	33,931,532.21
2021-12	$	48,237,600.97
2022-01	$	59,015,133.24
2022-02	$	61,519,863.19
2022-03	$	49,575,900.52
2022-04	$	41,838,279.88
2022-05	$	37,125,852.21
2022-06	$	41,820,966.38
2022-07	$	50,626,353.72
2022-08	$	57,354,074.11
2022-09	$	53,010,447.77
2022-10	$	40,687,942.13
2022-11	$	43,158,786.66
2022-12	$	62,000,894.39
2023-01	$	81,031,370.69
2023-02	$	63,554,093.44
2023-03	$	77,031,254.69
2023-04	$	60,606,487.28
2023-05	$	49,790,262.42
2023-06	$	48,547,019.50
2023-07	$	59,331,137.69
2023-08	$	63,790,138.07
2023-09	$	59,515,373.94
2023-10	$	47,105,910.52
2023-11	$	47,542,539.98
2023-12	$	68,433,057.92
2024-01	$	81,577,667.99
2024-02	$	71,037,863.47

Business Use

(g) The total number of residential default service customers.

Month	Count
2018-01	729,105
2018-02	728,262
2018-03	732,834
2018-04	736,268
2018-05	740,618
2018-06	746,752
2018-07	749,293
2018-08	753,970
2018-09	751,909
2018-10	756,688
2018-11	756,555
2018-12	756,754
2019-01	762,428
2019-02	764,109
2019-03	772,118
2019-04	777,492
2019-05	782,916
2019-06	784,783
2019-07	789,379
2019-08	792,176
2019-09	791,077
2019-10	793,164
2019-11	793,521
2019-12	794,609
2020-01	793,918
2020-02	793,790
2020-03	796,175
2020-04	791,204
2020-05	794,533
2020-06	799,406
2020-07	802,900
2020-08	805,634
2020-09	807,666
2020-10	810,348
2020-11	809,447
2020-12	810,881
2021-01	811,588
2021-02	812,215
2021-03	817,882
2021-04	819,626
2021-05	825,919
2021-06	834,631

Business Use

2021-07	835,977
2021-08	841,287
2021-09	844,646
2021-10	852,139
2021-11	854,162
2021-12	855,421
2022-01	858,425
2022-02	861,204
2022-03	869,803
2022-04	877,919
2022-05	864,192
2022-06	839,515
2022-07	843,366
2022-08	850,497
2022-09	851,949
2022-10	856,882
2022-11	852,997
2022-12	846,519
2023-01	843,456
2023-02	827,845
2023-03	815,512
2023-04	806,111
2023-05	808,147
2023-06	807,069
2023-07	806,763
2023-08	808,261
2023-09	804,922
2023-10	804,211
2023-11	801,643
2023-12	799,751
2024-01	798,530
2024-02	796,504

Business Use

(h) The total usage of residential default service customers.

Month	Usage (kWh)
2018-01	949,391,621
2018-02	786,544,466
2018-03	720,208,229
2018-04	686,986,160
2018-05	499,251,907
2018-06	500,224,648
2018-07	618,105,113
2018-08	653,911,570
2018-09	680,338,542
2018-10	504,540,481
2018-11	552,972,972
2018-12	772,744,210
2019-01	904,051,884
2019-02	925,995,381
2019-03	813,103,785
2019-04	648,922,985
2019-05	520,855,881
2019-06	520,402,099
2019-07	665,296,543
2019-08	731,385,812
2019-09	615,843,381
2019-10	525,584,373
2019-11	553,713,390
2019-12	800,186,361
2020-01	912,406,884
2020-02	831,016,100
2020-03	765,816,107
2020-04	655,322,869
2020-05	604,648,708
2020-06	587,368,447
2020-07	741,692,458
2020-08	846,501,388
2020-09	690,547,713
2020-10	545,097,178
2020-11	564,969,825
2020-12	778,451,284
2021-01	1,000,434,568
2021-02	1,019,910,151
2021-03	880,604,835
2021-04	647,800,935
2021-05	543,060,558
2021-06	627,025,642

Business Use

2021-07	766,553,721
2021-08	748,396,185
2021-09	752,968,382
2021-10	564,588,241
2021-11	610,881,066
2021-12	858,738,655
2022-01	1,038,933,509
2022-02	1,096,270,045
2022-03	887,498,331
2022-04	761,072,494
2022-05	611,252,233
2022-06	606,263,378
2022-07	715,178,774
2022-08	803,496,672
2022-09	728,440,134
2022-10	556,498,995
2022-11	578,357,642
2022-12	833,767,657
2023-01	989,278,853
2023-02	846,116,411
2023-03	798,723,053
2023-04	649,160,674
2023-05	505,173,484
2023-06	502,335,033
2023-07	626,830,509
2023-08	682,967,572
2023-09	634,116,039
2023-10	501,819,933
2023-11	521,918,272
2023-12	773,763,866
2024-01	926,619,617
2024-02	823,977,671

Business Use

(i) The total amount billed for generation supply charges for residential default service customers.

Month		Dollars
2018-01	$	71,292,740.25
2018-02	$	59,005,805.10
2018-03	$	53,966,717.02
2018-04	$	51,475,109.91
2018-05	$	37,466,074.46
2018-06	$	37,549,482.34
2018-07	$	46,278,373.11
2018-08	$	48,945,935.47
2018-09	$	50,874,515.50
2018-10	$	37,718,232.32
2018-11	$	41,322,070.80
2018-12	$	56,646,656.09
2019-01	$	64,155,251.46
2019-02	$	65,603,678.87
2019-03	$	57,616,793.10
2019-04	$	45,951,135.83
2019-05	$	36,844,560.77
2019-06	$	37,997,058.95
2019-07	$	50,636,595.04
2019-08	$	55,678,847.13
2019-09	$	46,854,049.56
2019-10	$	39,997,522.13
2019-11	$	42,110,492.55
2019-12	$	61,029,425.71
2020-01	$	69,875,787.53
2020-02	$	63,613,922.21
2020-03	$	58,612,325.08
2020-04	$	50,144,859.66
2020-05	$	46,267,631.98
2020-06	$	44,092,054.17
2020-07	$	54,166,580.81
2020-08	$	61,827,012.67
2020-09	$	50,440,686.61
2020-10	$	39,818,264.69
2020-11	$	41,246,686.41
2020-12	$	56,935,678.99
2021-01	$	73,418,167.50
2021-02	$	74,842,788.91
2021-03	$	64,657,348.98
2021-04	$	47,522,098.20
2021-05	$	39,854,986.68
2021-06	$	46,752,673.00

Business Use

2021-07	$	57,992,756.23
2021-08	$	56,642,233.50
2021-09	$	57,017,850.80
2021-10	$	42,774,099.37
2021-11	$	46,278,471.75
2021-12	$	72,313,304.30
2022-01	$	96,140,330.54
2022-02	$	98,481,130.02
2022-03	$	79,724,916.53
2022-04	$	68,307,118.23
2022-05	$	54,847,250.59
2022-06	$	63,254,786.43
2022-07	$	88,461,697.41
2022-08	$	99,586,266.33
2022-09	$	90,300,682.68
2022-10	$	68,957,920.28
2022-11	$	71,660,083.87
2022-12	$	110,468,471.16
2023-01	$	144,549,896.01
2023-02	$	123,755,145.86
2023-03	$	116,785,252.60
2023-04	$	94,905,791.51
2023-05	$	73,807,345.94
2023-06	$	68,532,516.24
2023-07	$	76,292,729.32
2023-08	$	83,057,818.82
2023-09	$	77,076,664.65
2023-10	$	60,957,541.50
2023-11	$	63,384,314.61
2023-12	$	90,844,313.70
2024-01	$	102,472,060.71
2024-02	$	91,100,293.09

Business Use

(j) The total number of CLI customers

Month	Count
2018-01	186,859
2018-02	188,483
2018-03	189,885
2018-04	190,864
2018-05	190,582
2018-06	190,069
2018-07	190,154
2018-08	190,422
2018-09	189,625
2018-10	190,243
2018-11	189,657
2018-12	189,351
2019-01	191,058
2019-02	192,297
2019-03	194,382
2019-04	195,507
2019-05	194,663
2019-06	192,721
2019-07	192,465
2019-08	191,873
2019-09	191,595
2019-10	191,655
2019-11	190,983
2019-12	191,627
2020-01	192,856
2020-02	194,141
2020-03	195,300
2020-04	195,393
2020-05	195,546
2020-06	195,668
2020-07	195,293
2020-08	194,768
2020-09	194,533
2020-10	196,393
2020-11	198,874
2020-12	201,547
2021-01	204,298
2021-02	207,232
2021-03	210,666
2021-04	211,057
2021-05	210,771
2021-06	210,878

Business Use

2021-07	209,646
2021-08	209,622
2021-09	209,626
2021-10	210,059
2021-11	210,799
2021-12	211,875
2022-01	214,460
2022-02	216,731
2022-03	219,269
2022-04	220,142
2022-05	220,506
2022-06	219,864
2022-07	219,538
2022-08	220,498
2022-09	219,761
2022-10	220,538
2022-11	221,291
2022-12	223,178
2023-01	227,270
2023-02	230,103
2023-03	231,529
2023-04	231,302
2023-05	231,345
2023-06	229,996
2023-07	231,748
2023-08	231,564
2023-09	231,617
2023-10	233,014
2023-11	233,767
2023-12	235,536
2024-01	238,602
2024-02	240,555

Business Use

(k) The total usage of CLI customers.

Month	Usage (kWh)
2018-01	336,520,278
2018-02	286,102,702
2018-03	264,453,286
2018-04	253,795,458
2018-05	174,644,445
2018-06	155,038,975
2018-07	184,123,312
2018-08	194,700,643
2018-09	200,018,274
2018-10	153,922,085
2018-11	186,347,129
2018-12	267,381,388
2019-01	311,236,539
2019-02	320,928,166
2019-03	285,443,759
2019-04	224,784,607
2019-05	166,725,048
2019-06	152,212,579
2019-07	186,548,582
2019-08	203,894,486
2019-09	172,977,180
2019-10	153,481,749
2019-11	176,358,891
2019-12	263,673,577
2020-01	300,801,326
2020-02	279,938,196
2020-03	259,205,683
2020-04	217,761,456
2020-05	196,643,974
2020-06	173,796,617
2020-07	207,522,548
2020-08	234,112,792
2020-09	193,413,822
2020-10	162,698,609
2020-11	179,777,731
2020-12	257,735,118
2021-01	335,972,897
2021-02	350,600,352
2021-03	310,456,350
2021-04	220,619,979
2021-05	176,043,690
2021-06	188,436,623

Business Use

2021-07	220,519,692
2021-08	214,687,666
2021-09	213,845,819
2021-10	164,581,251
2021-11	191,258,440
2021-12	281,535,683
2022-01	341,363,300
2022-02	367,462,785
2022-03	301,486,787
2022-04	253,022,257
2022-05	200,041,257
2022-06	188,109,042
2022-07	217,112,255
2022-08	241,117,554
2022-09	219,793,534
2022-10	176,475,239
2022-11	195,105,271
2022-12	291,730,662
2023-01	360,528,164
2023-02	318,115,614
2023-03	321,564,764
2023-04	258,697,192
2023-05	196,146,055
2023-06	181,263,613
2023-07	218,259,089
2023-08	234,715,868
2023-09	219,064,882
2023-10	183,110,190
2023-11	203,170,005
2023-12	314,447,123
2024-01	381,467,063
2024-02	346,293,238

Business Use

(l) The total amount billed for generation supply charges for all CLI customers.

Month		Dollars
2018-01	$	27,432,257.58
2018-02	$	23,348,545.25
2018-03	$	21,570,227.47
2018-04	$	20,443,018.82
2018-05	$	14,474,667.11
2018-06	$	12,689,003.53
2018-07	$	14,966,940.98
2018-08	$	15,772,414.54
2018-09	$	16,159,420.31
2018-10	$	12,408,429.56
2018-11	$	14,916,402.64
2018-12	$	21,119,451.23
2019-01	$	24,241,358.89
2019-02	$	25,026,512.55
2019-03	$	22,141,755.32
2019-04	$	17,402,543.48
2019-05	$	12,946,225.50
2019-06	$	12,132,858.24
2019-07	$	15,239,227.40
2019-08	$	16,646,266.32
2019-09	$	14,112,552.42
2019-10	$	12,540,243.51
2019-11	$	14,339,746.60
2019-12	$	21,376,656.87
2020-01	$	24,464,058.59
2020-02	$	22,834,938.83
2020-03	$	21,107,047.48
2020-04	$	17,724,574.08
2020-05	$	15,978,636.87
2020-06	$	13,955,913.41
2020-07	$	16,363,265.02
2020-08	$	18,460,669.75
2020-09	$	15,265,579.74
2020-10	$	12,833,642.46
2020-11	$	14,130,214.42
2020-12	$	20,204,129.01
2021-01	$	26,288,515.08
2021-02	$	27,425,401.16
2021-03	$	24,328,103.61
2021-04	$	17,367,144.67
2021-05	$	13,929,209.85
2021-06	$	15,103,052.28

Business Use

2021-07	$	17,886,583.54
2021-08	$	17,486,285.76
2021-09	$	17,496,996.44
2021-10	$	13,614,070.29
2021-11	$	15,756,509.68
2021-12	$	25,094,042.68
2022-01	$	32,870,344.70
2022-02	$	34,764,974.43
2022-03	$	28,578,017.17
2022-04	$	24,078,525.97
2022-05	$	19,180,371.17
2022-06	$	20,268,062.91
2022-07	$	26,728,346.66
2022-08	$	29,941,080.39
2022-09	$	27,547,027.32
2022-10	$	22,336,955.39
2022-11	$	24,780,366.02
2022-12	$	39,041,844.31
2023-01	$	52,053,099.05
2023-02	$	46,261,651.91
2023-03	$	46,222,801.96
2023-04	$	37,100,084.93
2023-05	$	27,990,291.13
2023-06	$	24,617,649.22
2023-07	$	27,289,115.10
2023-08	$	29,194,998.72
2023-09	$	27,190,461.46
2023-10	$	22,688,115.66
2023-11	$	25,031,784.63
2023-12	$	37,452,866.03
2024-01	$	43,425,934.75
2024-02	$	39,337,491.67

Business Use

(m) The total number of CLI customers who are not enrolled in PPL's Customer Assistance Program, CAP

Month	Count
2018-01	137,265
2018-02	139,746
2018-03	139,098
2018-04	137,625
2018-05	136,163
2018-06	134,692
2018-07	133,260
2018-08	132,932
2018-09	131,358
2018-10	131,172
2018-11	130,470
2018-12	132,823
2019-01	135,660
2019-02	136,367
2019-03	136,275
2019-04	134,361
2019-05	132,427
2019-06	130,823
2019-07	130,371
2019-08	129,298
2019-09	128,837
2019-10	127,864
2019-11	125,996
2019-12	128,349
2020-01	132,849
2020-02	134,847
2020-03	135,004
2020-04	132,801
2020-05	132,550
2020-06	132,239
2020-07	131,568
2020-08	130,177
2020-09	129,390
2020-10	130,563
2020-11	132,814
2020-12	135,701
2021-01	138,351
2021-02	140,587
2021-03	143,276
2021-04	143,381
2021-05	143,191
2021-06	144,168

Business Use

2021-07	143,599
2021-08	143,864
2021-09	144,127
2021-10	144,688
2021-11	146,132
2021-12	147,217
2022-01	149,129
2022-02	150,711
2022-03	152,546
2022-04	152,699
2022-05	153,296
2022-06	152,862
2022-07	152,050
2022-08	152,490
2022-09	151,611
2022-10	151,962
2022-11	152,584
2022-12	154,263
2023-01	157,905
2023-02	159,983
2023-03	161,415
2023-04	161,047
2023-05	161,101
2023-06	160,213
2023-07	162,848
2023-08	161,341
2023-09	159,959
2023-10	159,112
2023-11	158,729
2023-12	160,045
2024-01	162,376
2024-02	164,372

Business Use

(n) The total usage of all non-CAP CLI customers.

Month	Usage (kWh)
2018-01	234,183,890
2018-02	201,242,224
2018-03	182,667,283
2018-04	171,244,765
2018-05	118,163,993
2018-06	107,159,309
2018-07	128,089,531
2018-08	134,636,115
2018-09	137,378,901
2018-10	103,694,894
2018-11	120,625,041
2018-12	175,774,656
2019-01	208,365,110
2019-02	214,292,674
2019-03	187,521,838
2019-04	144,365,713
2019-05	107,876,506
2019-06	101,058,003
2019-07	125,767,522
2019-08	137,790,531
2019-09	115,615,172
2019-10	100,193,063
2019-11	109,544,257
2019-12	164,745,116
2020-01	196,065,758
2020-02	183,215,624
2020-03	168,503,024
2020-04	139,928,778
2020-05	126,684,674
2020-06	115,322,012
2020-07	139,958,559
2020-08	157,168,239
2020-09	128,286,022
2020-10	105,284,831
2020-11	113,926,234
2020-12	163,163,965
2021-01	213,902,256
2021-02	222,116,722
2021-03	197,483,102
2021-04	140,742,699
2021-05	113,738,508
2021-06	125,690,705

Business Use

2021-07	149,959,435
2021-08	146,340,773
2021-09	145,992,561
2021-10	111,041,471
2021-11	126,701,160
2021-12	184,561,658
2022-01	224,197,006
2022-02	239,906,650
2022-03	196,879,133
2022-04	164,966,433
2022-05	131,784,747
2022-06	127,971,490
2022-07	149,040,133
2022-08	165,903,233
2022-09	150,685,879
2022-10	117,975,276
2022-11	128,110,051
2022-12	189,891,743
2023-01	239,677,163
2023-02	201,132,054
2023-03	213,447,016
2023-04	170,870,519
2023-05	131,228,496
2023-06	123,682,668
2023-07	152,712,660
2023-08	163,048,870
2023-09	151,100,905
2023-10	121,622,347
2023-11	131,317,919
2023-12	201,577,109
2024-01	244,961,356
2024-02	222,887,079

Business Use

(o) The total amount billed for generation supply charges for all non-CAP CLI customers.

Month		Dollars
2018-01	$	19,183,324.67
2018-02	$	16,532,248.92
2018-03	$	15,027,327.31
2018-04	$	13,905,359.97
2018-05	$	9,892,267.38
2018-06	$	8,845,229.56
2018-07	$	10,531,765.00
2018-08	$	11,049,179.09
2018-09	$	11,262,533.64
2018-10	$	8,488,609.99
2018-11	$	9,808,782.93
2018-12	$	14,112,431.59
2019-01	$	16,562,036.84
2019-02	$	17,114,977.57
2019-03	$	14,916,572.64
2019-04	$	11,478,680.14
2019-05	$	8,602,611.14
2019-06	$	8,247,804.75
2019-07	$	10,481,006.22
2019-08	$	11,493,932.94
2019-09	$	9,632,647.48
2019-10	$	8,372,530.26
2019-11	$	9,121,024.07
2019-12	$	13,650,333.40
2020-01	$	16,263,512.84
2020-02	$	15,241,977.00
2020-03	$	13,992,636.18
2020-04	$	11,624,485.19
2020-05	$	10,516,432.49
2020-06	$	9,475,555.61
2020-07	$	11,313,761.02
2020-08	$	12,712,232.07
2020-09	$	10,400,382.12
2020-10	$	8,539,883.89
2020-11	$	9,214,771.25
2020-12	$	13,148,346.49
2021-01	$	17,171,240.46
2021-02	$	17,824,222.89
2021-03	$	15,855,328.78
2021-04	$	11,359,861.80
2021-05	$	9,231,545.87
2021-06	$	10,325,127.80

Business Use

2021-07	$	12,458,565.72
2021-08	$	12,225,394.07
2021-09	$	12,275,235.64
2021-10	$	9,489,291.92
2021-11	$	10,794,850.72
2021-12	$	16,889,008.26
2022-01	$	21,947,467.25
2022-02	$	23,180,904.24
2022-03	$	19,069,977.73
2022-04	$	16,087,699.62
2022-05	$	12,985,065.57
2022-06	$	13,964,027.25
2022-07	$	18,285,733.99
2022-08	$	20,606,984.25
2022-09	$	18,963,734.85
2022-10	$	15,071,263.16
2022-11	$	16,466,040.62
2022-12	$	25,527,576.26
2023-01	$	34,395,245.82
2023-02	$	29,160,656.01
2023-03	$	30,418,191.21
2023-04	$	24,264,611.62
2023-05	$	18,502,840.01
2023-06	$	16,756,675.94
2023-07	$	19,313,155.44
2023-08	$	20,479,283.02
2023-09	$	18,929,414.68
2023-10	$	15,218,499.34
2023-11	$	16,305,727.04
2023-12	$	24,215,219.25
2024-01	$	28,339,380.10
2024-02	$	25,701,387.79

Business Use

(p) The total number of all CAP customers

Month	Count
2018-01	49,594
2018-02	48,737
2018-03	50,787
2018-04	53,239
2018-05	54,419
2018-06	55,377
2018-07	56,894
2018-08	57,490
2018-09	58,267
2018-10	59,071
2018-11	59,187
2018-12	56,528
2019-01	55,398
2019-02	55,930
2019-03	58,107
2019-04	61,146
2019-05	62,236
2019-06	61,898
2019-07	62,094
2019-08	62,575
2019-09	62,758
2019-10	63,791
2019-11	64,987
2019-12	63,278
2020-01	60,007
2020-02	59,294
2020-03	60,296
2020-04	62,592
2020-05	62,996
2020-06	63,429
2020-07	63,725
2020-08	64,591
2020-09	65,143
2020-10	65,830
2020-11	66,060
2020-12	65,846
2021-01	65,947
2021-02	66,645
2021-03	67,390
2021-04	67,676
2021-05	67,580
2021-06	66,710

Business Use

2021-07	66,047
2021-08	65,758
2021-09	65,499
2021-10	65,371
2021-11	64,667
2021-12	64,658
2022-01	65,331
2022-02	66,020
2022-03	66,723
2022-04	67,443
2022-05	67,210
2022-06	67,002
2022-07	67,488
2022-08	68,008
2022-09	68,150
2022-10	68,576
2022-11	68,707
2022-12	68,915
2023-01	69,365
2023-02	70,120
2023-03	70,114
2023-04	70,255
2023-05	70,244
2023-06	69,783
2023-07	68,900
2023-08	70,223
2023-09	71,658
2023-10	73,902
2023-11	75,038
2023-12	75,491
2024-01	76,226
2024-02	76,183

Business Use

(q)1 The total usage of all CAP customers

Month	Usage (kWh)
2018-01	102,336,388
2018-02	84,860,478
2018-03	81,786,003
2018-04	82,550,693
2018-05	56,480,452
2018-06	47,879,666
2018-07	56,033,781
2018-08	60,064,528
2018-09	62,639,373
2018-10	50,227,191
2018-11	65,722,088
2018-12	91,606,732
2019-01	102,871,429
2019-02	106,635,492
2019-03	97,921,921
2019-04	80,418,894
2019-05	58,848,542
2019-06	51,154,576
2019-07	60,781,060
2019-08	66,103,955
2019-09	57,362,008
2019-10	53,288,686
2019-11	66,814,634
2019-12	98,928,461
2020-01	104,735,568
2020-02	96,722,572
2020-03	90,702,659
2020-04	77,832,678
2020-05	69,959,300
2020-06	58,474,605
2020-07	67,563,989
2020-08	76,944,553
2020-09	65,127,800
2020-10	57,413,778
2020-11	65,851,497
2020-12	94,571,153
2021-01	122,070,641
2021-02	128,483,630
2021-03	112,973,248
2021-04	79,877,280
2021-05	62,305,182
2021-06	62,745,918

Business Use

2021-07	70,560,257
2021-08	68,346,893
2021-09	67,853,258
2021-10	53,539,780
2021-11	64,557,280
2021-12	96,974,025
2022-01	117,166,294
2022-02	127,556,135
2022-03	104,607,654
2022-04	88,055,824
2022-05	68,256,510
2022-06	60,137,552
2022-07	68,072,122
2022-08	75,214,321
2022-09	69,107,655
2022-10	58,499,963
2022-11	66,995,220
2022-12	101,838,919
2023-01	120,851,001
2023-02	116,983,560
2023-03	108,117,748
2023-04	87,826,673
2023-05	64,917,559
2023-06	57,580,945
2023-07	65,546,429
2023-08	71,666,998
2023-09	67,963,977
2023-10	61,487,843
2023-11	71,852,086
2023-12	112,870,014
2024-01	136,505,707
2024-02	123,406,159

Business Use

(r) The total amount billed for generation supply charges for all CAP customers before CAP credit was applied.

Month	Dollars
2018-01	$ 8,248,932.91
2018-02	$ 6,816,296.33
2018-03	$ 6,542,900.16
2018-04	$ 6,537,658.85
2018-05	$ 4,582,399.73
2018-06	$ 3,843,773.97
2018-07	$ 4,435,175.98
2018-08	$ 4,723,235.45
2018-09	$ 4,896,886.67
2018-10	$ 3,919,819.57
2018-11	$ 5,107,619.71
2018-12	$ 7,007,019.64
2019-01	$ 7,679,322.05
2019-02	$ 7,911,534.98
2019-03	$ 7,225,182.68
2019-04	$ 5,923,863.34
2019-05	$ 4,343,614.36
2019-06	$ 3,885,053.49
2019-07	$ 4,758,221.18
2019-08	$ 5,152,333.38
2019-09	$ 4,479,904.94
2019-10	$ 4,167,713.25
2019-11	$ 5,218,722.53
2019-12	$ 7,726,323.47
2020-01	$ 8,200,545.75
2020-02	$ 7,592,961.83
2020-03	$ 7,114,411.30
2020-04	$ 6,100,088.89
2020-05	$ 5,462,204.38
2020-06	$ 4,480,357.80
2020-07	$ 5,049,504.00
2020-08	$ 5,748,437.68
2020-09	$ 4,865,197.62
2020-10	$ 4,293,758.57
2020-11	$ 4,915,443.17
2020-12	$ 7,055,782.52
2021-01	$ 9,117,274.62
2021-02	$ 9,601,178.27
2021-03	$ 8,472,774.83
2021-04	$ 6,007,282.87
2021-05	$ 4,697,663.98
2021-06	$ 4,777,924.48

Business Use

2021-07	$ 5,428,017.82
2021-08	$ 5,260,891.69
2021-09	$ 5,221,760.80
2021-10	$ 4,124,778.37
2021-11	$ 4,961,658.96
2021-12	$ 8,205,034.42
2022-01	$ 10,922,877.45
2022-02	$ 11,584,070.19
2022-03	$ 9,508,039.44
2022-04	$ 7,990,826.35
2022-05	$ 6,195,305.60
2022-06	$ 6,304,035.66
2022-07	$ 8,442,612.67
2022-08	$ 9,334,096.14
2022-09	$ 8,583,292.47
2022-10	$ 7,265,692.23
2022-11	$ 8,314,325.40
2022-12	$ 13,514,268.05
2023-01	$ 17,657,853.23
2023-02	$ 17,100,995.90
2023-03	$ 15,804,610.75
2023-04	$ 12,835,473.31
2023-05	$ 9,487,451.12
2023-06	$ 7,860,973.28
2023-07	$ 7,975,959.66
2023-08	$ 8,715,715.70
2023-09	$ 8,261,046.78
2023-10	$ 7,469,616.32
2023-11	$ 8,726,057.59
2023-12	$ 13,237,646.78
2024-01	$ 15,086,554.65
2024-02	$ 13,636,103.88

Business Use

(s) The total number of residential non-CAP CLI shopping customers.

Month	Count
2018-01	60,155
2018-02	61,072
2018-03	60,597
2018-04	59,465
2018-05	58,691
2018-06	57,866
2018-07	56,971
2018-08	56,406
2018-09	55,806
2018-10	55,347
2018-11	55,230
2018-12	56,079
2019-01	56,504
2019-02	56,475
2019-03	55,979
2019-04	54,452
2019-05	53,408
2019-06	52,881
2019-07	52,396
2019-08	51,914
2019-09	51,473
2019-10	50,974
2019-11	50,519
2019-12	50,884
2020-01	51,544
2020-02	51,924
2020-03	51,987
2020-04	51,806
2020-05	51,539
2020-06	51,197
2020-07	50,865
2020-08	50,368
2020-09	49,822
2020-10	49,909
2020-11	50,662
2020-12	51,372
2021-01	52,177
2021-02	52,765
2021-03	52,927
2021-04	52,703
2021-05	52,027
2021-06	51,767

Business Use

2021-07	51,485
2021-08	51,457
2021-09	51,319
2021-10	51,179
2021-11	51,491
2021-12	51,762
2022-01	52,096
2022-02	52,420
2022-03	52,307
2022-04	51,369
2022-05	52,908
2022-06	55,400
2022-07	54,815
2022-08	54,445
2022-09	53,824
2022-10	53,593
2022-11	53,943
2022-12	55,210
2023-01	56,780
2023-02	58,983
2023-03	60,739
2023-04	61,652
2023-05	62,235
2023-06	62,631
2023-07	63,190
2023-08	62,955
2023-09	63,069
2023-10	63,523
2023-11	63,824
2023-12	64,632
2024-01	65,665
2024-02	66,238

Business Use

(t) The total usage of residential non-CAP CLI shopping customers.

Month	Usage
2018-01	106,244,164
2018-02	90,160,281
2018-03	81,689,393
2018-04	76,660,367
2018-05	52,853,464
2018-06	47,853,916
2018-07	57,140,180
2018-08	59,396,251
2018-09	60,889,675
2018-10	45,616,595
2018-11	52,786,627
2018-12	76,563,394
2019-01	88,769,944
2019-02	90,812,136
2019-03	78,701,387
2019-04	59,751,014
2019-05	44,922,454
2019-06	42,574,839
2019-07	52,934,186
2019-08	57,671,613
2019-09	48,247,497
2019-10	41,528,696
2019-11	44,970,942
2019-12	66,489,437
2020-01	76,698,914
2020-02	70,783,678
2020-03	65,534,445
2020-04	55,112,678
2020-05	49,849,895
2020-06	45,773,746
2020-07	55,829,374
2020-08	62,714,136
2020-09	50,861,959
2020-10	41,271,223
2020-11	44,310,982
2020-12	62,872,947
2021-01	82,120,634
2021-02	84,454,863
2021-03	75,616,279
2021-04	53,304,649
2021-05	42,600,424
2021-06	47,330,007

Business Use

2021-07	56,245,538
2021-08	54,534,152
2021-09	53,928,876
2021-10	40,633,750
2021-11	45,966,152
2021-12	66,399,045
2022-01	80,030,023
2022-02	84,644,283
2022-03	69,105,289
2022-04	56,675,322
2022-05	47,103,525
2022-06	48,429,855
2022-07	56,667,776
2022-08	62,318,961
2022-09	56,243,393
2022-10	43,304,968
2022-11	46,723,964
2022-12	68,012,526
2023-01	89,717,953
2023-02	70,920,112
2023-03	86,503,124
2023-04	69,761,232
2023-05	55,813,710
2023-06	52,029,853
2023-07	63,199,505
2023-08	68,562,855
2023-09	64,328,238
2023-10	52,843,156
2023-11	56,180,337
2023-12	86,253,230
2024-01	105,451,587
2024-02	95,055,821

Business Use

(u) The total amount billed for generation supply charges for non-CAP CLI shopping customers.

Month	Dollars
2018-01	$ 9,540,993.37
2018-02	$ 8,176,322.72
2018-03	$ 7,435,257.10
2018-04	$ 6,771,259.73
2018-05	$ 4,952,580.97
2018-06	$ 4,375,523.00
2018-07	$ 5,202,549.69
2018-08	$ 5,413,031.67
2018-09	$ 5,513,012.86
2018-10	$ 4,125,464.91
2018-11	$ 4,722,880.62
2018-12	$ 6,821,184.37
2019-01	$ 8,046,527.53
2019-02	$ 8,331,137.33
2019-03	$ 7,165,883.11
2019-04	$ 5,439,475.79
2019-05	$ 4,124,733.71
2019-06	$ 3,965,983.47
2019-07	$ 4,919,303.15
2019-08	$ 5,375,887.25
2019-09	$ 4,497,183.81
2019-10	$ 3,886,722.38
2019-11	$ 4,195,213.14
2019-12	$ 6,140,740.17
2020-01	$ 7,103,150.85
2020-02	$ 6,612,104.40
2020-03	$ 6,089,486.04
2020-04	$ 5,122,259.86
2020-05	$ 4,630,162.60
2020-06	$ 4,242,940.23
2020-07	$ 5,160,816.56
2020-08	$ 5,800,706.91
2020-09	$ 4,734,116.52
2020-10	$ 3,853,587.63
2020-11	$ 4,119,852.07
2020-12	$ 5,799,558.78
2021-01	$ 7,487,542.59
2021-02	$ 7,703,471.40
2021-03	$ 6,882,469.13
2021-04	$ 4,922,529.35
2021-05	$ 3,995,239.74
2021-06	$ 4,461,679.74

Business Use

2021-07	$ 5,349,596.32
2021-08	$ 5,260,792.73
2021-09	$ 5,278,596.26
2021-10	$ 4,133,903.43
2021-11	$ 4,654,170.35
2021-12	$ 6,913,919.99
2022-01	$ 8,576,553.84
2022-02	$ 9,196,814.51
2022-03	$ 7,549,081.00
2022-04	$ 6,308,096.45
2022-05	$ 5,353,023.26
2022-06	$ 5,648,352.94
2022-07	$ 6,837,023.95
2022-08	$ 7,738,636.80
2022-09	$ 7,226,513.29
2022-10	$ 5,791,281.72
2022-11	$ 6,355,506.05
2022-12	$ 9,357,136.01
2023-01	$ 12,455,517.31
2023-02	$ 10,097,139.11
2023-03	$ 11,838,094.79
2023-04	$ 9,472,505.42
2023-05	$ 7,470,993.58
2023-06	$ 6,966,600.45
2023-07	$ 8,392,196.83
2023-08	$ 8,949,462.81
2023-09	$ 8,349,300.31
2023-10	$ 6,842,642.04
2023-11	$ 7,161,706.90
2023-12	$ 10,653,654.98
2024-01	$ 12,882,345.28
2024-02	$ 11,546,412.30

Business Use

(v) The total number of residential, non-CAP, default service CLI customers.

Month	Count
2018-01	77,110
2018-02	78,674
2018-03	78,501
2018-04	78,160
2018-05	77,472
2018-06	76,826
2018-07	76,289
2018-08	76,526
2018-09	75,552
2018-10	75,825
2018-11	75,240
2018-12	76,744
2019-01	79,156
2019-02	79,892
2019-03	80,296
2019-04	79,909
2019-05	79,019
2019-06	77,942
2019-07	77,975
2019-08	77,384
2019-09	77,364
2019-10	76,890
2019-11	75,477
2019-12	77,465
2020-01	81,305
2020-02	82,923
2020-03	83,017
2020-04	80,995
2020-05	81,011
2020-06	81,042
2020-07	80,703
2020-08	79,809
2020-09	79,568
2020-10	80,654
2020-11	82,152
2020-12	84,329
2021-01	86,174
2021-02	87,822
2021-03	90,349
2021-04	90,678
2021-05	91,164
2021-06	92,401

Business Use

2021-07	92,114
2021-08	92,407
2021-09	92,808
2021-10	93,509
2021-11	94,641
2021-12	95,455
2022-01	97,033
2022-02	98,291
2022-03	100,239
2022-04	101,330
2022-05	100,388
2022-06	97,462
2022-07	97,235
2022-08	98,045
2022-09	97,787
2022-10	98,369
2022-11	98,641
2022-12	99,053
2023-01	101,125
2023-02	101,000
2023-03	100,676
2023-04	99,395
2023-05	98,866
2023-06	97,582
2023-07	99,658
2023-08	98,386
2023-09	96,890
2023-10	95,589
2023-11	94,905
2023-12	95,413
2024-01	96,711
2024-02	98,134

Business Use

(w) The total usage of residential, non-CAP, default service CLI customers.

Month	Usage (kWh)
2018-01	127,939,726
2018-02	111,081,943
2018-03	100,977,890
2018-04	94,584,398
2018-05	65,310,529
2018-06	59,305,393
2018-07	70,949,351
2018-08	75,239,864
2018-09	76,489,226
2018-10	58,078,299
2018-11	67,838,414
2018-12	99,211,262
2019-01	119,595,166
2019-02	123,480,538
2019-03	108,820,451
2019-04	84,614,699
2019-05	62,954,052
2019-06	58,483,164
2019-07	72,833,336
2019-08	80,118,918
2019-09	67,367,675
2019-10	58,664,367
2019-11	64,573,315
2019-12	98,255,679
2020-01	119,366,844
2020-02	112,431,946
2020-03	102,968,579
2020-04	84,816,100
2020-05	76,834,779
2020-06	69,548,266
2020-07	84,129,185
2020-08	94,454,103
2020-09	77,424,063
2020-10	64,013,608
2020-11	69,615,252
2020-12	100,291,018
2021-01	131,781,622
2021-02	137,661,859
2021-03	121,866,823
2021-04	87,438,050
2021-05	71,138,084
2021-06	78,360,698

Business Use

2021-07	93,713,897
2021-08	91,806,621
2021-09	92,063,685
2021-10	70,407,721
2021-11	80,735,008
2021-12	118,162,613
2022-01	144,166,983
2022-02	155,262,367
2022-03	127,773,844
2022-04	108,291,111
2022-05	84,681,222
2022-06	79,541,635
2022-07	92,372,357
2022-08	103,584,272
2022-09	94,442,486
2022-10	74,670,308
2022-11	81,386,087
2022-12	121,879,217
2023-01	149,959,210
2023-02	130,211,942
2023-03	126,943,892
2023-04	101,109,287
2023-05	75,414,786
2023-06	71,652,815
2023-07	89,513,155
2023-08	94,486,015
2023-09	86,772,667
2023-10	68,779,191
2023-11	75,137,582
2023-12	115,323,879
2024-01	139,509,769
2024-02	127,831,258

Business Use

(x) The total amount billed for generation supply charges for non-CAP default service CLI customers.

Month	Dollars
2018-01	$ 9,642,331.30
2018-02	$ 8,355,926.20
2018-03	$ 7,592,070.21
2018-04	$ 7,134,100.24
2018-05	$ 4,939,686.41
2018-06	$ 4,469,706.56
2018-07	$ 5,329,215.31
2018-08	$ 5,636,147.42
2018-09	$ 5,749,520.78
2018-10	$ 4,363,145.08
2018-11	$ 5,085,902.31
2018-12	$ 7,291,247.22
2019-01	$ 8,515,509.31
2019-02	$ 8,783,840.24
2019-03	$ 7,750,689.53
2019-04	$ 6,039,204.35
2019-05	$ 4,477,877.43
2019-06	$ 4,281,821.28
2019-07	$ 5,561,703.07
2019-08	$ 6,118,045.69
2019-09	$ 5,135,463.67
2019-10	$ 4,485,807.88
2019-11	$ 4,925,810.93
2019-12	$ 7,509,593.23
2020-01	$ 9,160,361.99
2020-02	$ 8,629,872.60
2020-03	$ 7,903,150.14
2020-04	$ 6,502,225.33
2020-05	$ 5,886,269.89
2020-06	$ 5,232,615.38
2020-07	$ 6,152,944.46
2020-08	$ 6,911,525.16
2020-09	$ 5,666,265.60
2020-10	$ 4,686,296.26
2020-11	$ 5,094,919.18
2020-12	$ 7,348,787.71
2021-01	$ 9,683,697.87
2021-02	$ 10,120,751.49
2021-03	$ 8,972,859.65
2021-04	$ 6,437,332.45
2021-05	$ 5,236,306.13
2021-06	$ 5,863,448.06

Business Use

2021-07	$ 7,108,969.40
2021-08	$ 6,964,601.34
2021-09	$ 6,996,639.38
2021-10	$ 5,355,388.49
2021-11	$ 6,140,680.37
2021-12	$ 9,975,088.27
2022-01	$ 13,370,913.41
2022-02	$ 13,984,089.73
2022-03	$ 11,520,896.73
2022-04	$ 9,779,603.17
2022-05	$ 7,632,042.31
2022-06	$ 8,315,674.31
2022-07	$ 11,448,710.04
2022-08	$ 12,868,347.45
2022-09	$ 11,737,221.56
2022-10	$ 9,279,981.44
2022-11	$ 10,110,534.57
2022-12	$ 16,170,440.25
2023-01	$ 21,939,728.51
2023-02	$ 19,063,516.90
2023-03	$ 18,580,096.42
2023-04	$ 14,792,106.20
2023-05	$ 11,031,846.43
2023-06	$ 9,790,075.49
2023-07	$ 10,920,958.61
2023-08	$ 11,529,820.21
2023-09	$ 10,580,114.37
2023-10	$ 8,375,857.30
2023-11	$ 9,144,020.14
2023-12	$ 13,561,564.27
2024-01	$ 15,457,034.82
2024-02	$ 14,154,975.49

Business Use

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set I Interrogatories and Requests for Documents of
The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated March 18, 2024
Docket No. P-2024-3047290

CAUSE-PA I-2 Please explain how PPL defines the term "confirmed low income customers" and identify the criteria to be considered a confirmed low income (CLI) customer.

PPL Response PPL Electric considers the following customers to be confirmed low income:

- Participants in OnTrack;
- Customers who have received a LIHEAP Cash or Crisis grant within 12 months of reporting period; or
- Customers who have reported their income to PPL Electric and are level 1 (below 150% of poverty) within 12 months of the reporting period.

WITNESS: Andy Castanaro

PPL Electric Utilities Corporation
Response to the Set I Interrogatories and Requests for Documents of
The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated March 18, 2024
Docket No. P-2024-3047290

CAUSE-PA I-3 In a live Excel spreadsheet, please provide the applicable price to compare for January 2018 to date, disaggregated by month and by year.

PPL Response See CAUSE-PA I-3 Attachment 1.

Period	Residential PTC (cents/kWh)	Small C&I PTC (cents/kWh)
12/1/2023 - 5/31/2024	11.028	11.386
6/1/2023 - 11/30/2023	12.126	11.689
12/1/2022 - 5/31/2023	14.612	14.751
6/1/2022 - 11/30/2022	12.366	11.695
1/1/2022 - 5/31/2022	8.941	9.675
12/1/2021 - 12/31/2021	9.502	10.285
6/1/2021 - 11/30/2021	7.544	7.541
12/1/2020 - 5/31/2021	7.317	6.662
6/1/2020 - 11/30/2020	7.284	6.079
12/1/2019 - 5/31/2020	7.632	6.360
6/1/2019 - 11/30/2019	7.585	6.207
12/1/2018 - 5/31/2019	7.039	7.244
6/1/2018 - 11/30/2018	7.449	6.776
12/1/2017 - 5/31/2018	7.463	7.701

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set I Interrogatories and Requests for Documents of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated March 18, 2024
Docket No. P-2024-3047290

CAUSE-PA I-10 Since June 2021, disaggregated by month, please indicate the number of confirmed low income customers that participated in PPL's Time of Use rate, as well as the total usage and total charges billed for the identified customers.

PPL Response See CAUSE-PA I-10 Attachment 1.

Month	Customers	Usage (kWh)	Total Charges Billed
2021-06	2,281	2,153,492	$ 178,950.53
2021-07	2,343	2,674,139	$ 225,710.29
2021-08	2,353	2,579,608	$ 222,842.21
2021-09	2,341	2,630,874	$ 227,862.75
2021-10	2,426	2,082,150	$ 175,140.80
2021-11	2,471	2,489,945	$ 205,482.67
2021-12	2,553	3,854,781	$ 342,874.00
2022-01	2,676	4,671,448	$ 437,451.23
2022-02	2,655	4,869,535	$ 448,308.32
2022-03	2,724	4,227,363	$ 385,031.05
2022-04	2,711	3,596,505	$ 328,815.16
2022-05	2,779	2,871,088	$ 274,621.01
2022-06	2,905	2,862,527	$ 309,122.40
2022-07	2,928	3,304,972	$ 403,091.09
2022-08	2,938	3,606,596	$ 438,795.42
2022-09	2,847	3,259,234	$ 399,983.63
2022-10	2,812	2,516,832	$ 309,572.47
2022-11	2,848	2,800,144	$ 339,936.92
2022-12	2,812	3,053,106	$ 370,708.32
2023-01	2,818	1,836,882	$ 242,216.34
2023-02	2,987	8,873,112	$ 1,187,106.23
2023-03	3,112	4,660,720	$ 630,694.63
2023-04	3,163	3,729,484	$ 499,853.49
2023-05	3,150	2,952,861	$ 395,836.90
2023-06	3,108	2,871,899	$ 367,505.71
2023-07	3,099	3,167,855	$ 362,786.92
2023-08	3,039	3,508,230	$ 393,311.89
2023-09	3,026	3,136,735	$ 383,221.10
2023-10	3,118	3,436,227	$ 394,005.23
2023-11	3,105	3,364,116	$ 408,337.69
2023-12	3,166	4,901,091	$ 555,764.21
2024-01	3,149	5,532,818	$ 589,833.03
2024-02	3,133	4,866,826	$ 508,748.23

Business Use

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set I Interrogatories and Requests for Documents of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated March 18, 2024
Docket No. P-2024-3047290

CAUSE-PA I-12 See PPL St. 3 at 12-15, Charts MS-1, MS-2, MS-3, MS-4. Please provide the data used to create these charts in Excel file format, with formula intact.

PPL Response See CAUSE-PA I-12 Attachment 1.

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set II Interrogatories of
the Coalition for Affordable Utility Services and
Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated May 20, 2024
Docket No. P-2024-3047290

CAUSE-PA II-2

See PPL's response to OCA I-14, attachment. Please provide a copy of any and all correspondence currently sent to customers who did not drop their supplier within 14 days of OnTrack enrollment.

PPL Response

The Company has included the three communication pieces that are used for notifying customers about the need to drop the Supplier for OnTrack enrollment.

- CAUSE PA II-2 Attachment 1– Letter notification of approved enrollment but customer needs to drop supplier.
- CAUSE PA II-2 Attachment 2 – Email reminder to drop supplier.
- CAUSE PA II-2 Attachment 3 – Rejection letter for failure to drop the supplier.

PPL Electric Utilities
Docket No. P-2024-3047290
CAUSE-PA II-2 Attachment 1

Customer Name

Service Address:

Date

Bill Account Number: 0000000000

Dear Customer Name:

Your application for our OnTrack program is approved. Among other benefits, OnTrack will lower your monthly electric bill payments and help you erase any debt you may owe us.

Before we can complete your enrollment, you need to take one more step.

To participate in OnTrack, you must cancel your contract with your current supplier. Instead, you will receive default supply through PPL. We will buy electricity supply for you and pass it along without profit to us. This way, you can be confident that you're always paying a fair rate for supply. Your current supplier is:

Supplier Name

Supplier Contact Phone Number

Please call your supplier at the phone number above within 15 days to cancel your contract.

Remember that you have entered a contract with your current supplier. If your supplier charges an early cancellation fee, you can choose to cancel your contract immediately (and pay the fee) or wait and apply for OnTrack later. If you do not cancel your contract with the supplier, we will close your OnTrack application without enrolling you in the program.

We want to assure you that we've taken steps to prevent any collection action, such as late payment charges, collection notices and service termination, to allow you 15 days to request a cancellation from your supplier.

Your estimated OnTrack payment amount will be $XX.XX. Once your supplier confirms the cancellation with us, we will enter the OnTrack agreement onto your account and send you a welcome package, which will include all the information you need to be successful in the program.

Again, we are excited to welcome you to OnTrack.

Sincerely,

PPL Electric Utilities

PPL Electric Utilities
Docket No. P-2024-3047290
CAUSE-PA II-2 Attachment 2

Email Subject: Your PPL OnTrack Application

Email Title: Waiting for Supplier Contract Cancellation

Email Content:

Reminder: Before we can enroll you in our OnTrack program, you need to cancel your contract with your current electricity supplier. Instead, you will receive default supply through PPL. We will buy electricity supply for you and pass it along without profit to us. This way, you can be confident that you're always paying a fair rate for supply. Your current supplier is:

SUPPLIER NAME

SUPPLIER PHONE NUMBER

Please call your supplier at the phone number above within 5 days to cancel your contract. Remember that you have entered a contract with your current supplier. If your supplier charges an early cancellation fee, you can choose to cancel your contract immediately (and pay the fee) or wait and apply for OnTrack later. If you do not cancel your contract with the supplier, we will close your OnTrack application without enrolling you in the program.

Thank you.

PPL Electric Utilities
Docket No. P-2024-3047290
CAUSE-PA II-2 Attachment 3

Customer Name

Service Address:

Date

Bill Account Number: 0000000000

Dear CustomerName:

Thank you for applying to PPL's OnTrack program. We reviewed your OnTrack application. This letter is to inform you that you do not meet the OnTrack guidelines based on the following reason:

You have not removed supplier within a timely manner.

If you have any questions, you may contact us at the agency listed below.

AgencyName
AgencyStreetAddress
AgencyCityStateZi
PhoneNumber
Email

If you are not enrolled in OnTrack, you have the option of entering into a payment agreement. Please call PPL at 1-800-342-5775.

Sincerely,
OnTrack Representative

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set II Interrogatories of
the Coalition for Affordable Utility Services and
Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated May 20, 2024
Docket No. P-2024-3047290

CAUSE-PA II-7	Please update CAUSE-PA to PPL I-1 to include data for March and April, 2024.
PPL Response	See CAUSE-PA II-7 Attachment 1.

CAUSE-PA to PPL II-7

(a) The total number of residential customers.

Month	Count
2018-01	1,263,332
2018-02	1,262,544
2018-03	1,266,391
2018-04	1,269,437
2018-05	1,271,409
2018-06	1,272,039
2018-07	1,272,432
2018-08	1,274,257
2018-09	1,270,156
2018-10	1,273,269
2018-11	1,270,714
2018-12	1,268,633
2019-01	1,269,170
2019-02	1,268,395
2019-03	1,273,587
2019-04	1,275,406
2019-05	1,278,364
2019-06	1,277,829
2019-07	1,279,596
2019-08	1,280,561
2019-09	1,277,257
2019-10	1,277,827
2019-11	1,276,139
2019-12	1,276,006
2020-01	1,274,175
2020-02	1,274,532
2020-03	1,276,994
2020-04	1,272,379
2020-05	1,275,196
2020-06	1,279,652
2020-07	1,282,873
2020-08	1,284,094
2020-09	1,284,413
2020-10	1,284,946
2020-11	1,283,323
2020-12	1,283,597
2021-01	1,282,020
2021-02	1,281,859
2021-03	1,285,463
2021-04	1,285,597

Business Use

2021-05	1,288,028
2021-06	1,292,930
2021-07	1,289,826
2021-08	1,291,449
2021-09	1,288,282
2021-10	1,289,019
2021-11	1,289,302
2021-12	1,288,537
2022-01	1,287,941
2022-02	1,286,548
2022-03	1,289,838
2022-04	1,291,654
2022-05	1,294,944
2022-06	1,296,413
2022-07	1,294,833
2022-08	1,297,810
2022-09	1,295,238
2022-10	1,295,857
2022-11	1,294,738
2022-12	1,293,815
2023-01	1,298,492
2023-02	1,300,170
2023-03	1,299,646
2023-04	1,296,040
2023-05	1,301,154
2023-06	1,302,150
2023-07	1,302,665
2023-08	1,305,707
2023-09	1,302,633
2023-10	1,303,031
2023-11	1,301,234
2023-12	1,299,958
2024-01	1,299,742
2024-02	1,298,731
2024-03	1,300,720
2024-04	1,304,428

(b) The total usage of residential customers

Month	Count
2018-01	1,817,107,582
2018-02	1,493,533,308
2018-03	1,364,201,676
2018-04	1,303,105,672
2018-05	941,495,330

Business Use

2018-06	933,148,404
2018-07	1,144,578,740
2018-08	1,202,957,997
2018-09	1,247,333,013
2018-10	925,216,010
2018-11	1,009,304,963
2018-12	1,405,035,551
2019-01	1,625,858,110
2019-02	1,658,614,766
2019-03	1,443,151,364
2019-04	1,142,959,603
2019-05	917,750,149
2019-06	919,271,430
2019-07	1,167,740,296
2019-08	1,277,541,496
2019-09	1,073,514,544
2019-10	914,500,619
2019-11	954,487,040
2019-12	1,372,474,833
2020-01	1,566,047,364
2020-02	1,421,786,178
2020-03	1,312,027,081
2020-04	1,123,445,936
2020-05	1,037,513,929
2020-06	1,011,106,533
2020-07	1,272,611,723
2020-08	1,446,300,095
2020-09	1,177,764,787
2020-10	928,315,787
2020-11	958,447,327
2020-12	1,317,415,306
2021-01	1,687,329,388
2021-02	1,708,214,582
2021-03	1,485,880,840
2021-04	1,085,550,200
2021-05	904,867,873
2021-06	1,044,146,868
2021-07	1,263,752,175
2021-08	1,225,691,182
2021-09	1,219,452,533
2021-10	906,381,454
2021-11	973,990,670
2021-12	1,359,113,625
2022-01	1,635,304,349

Business Use

2022-02	1,709,454,832
2022-03	1,378,161,934
2022-04	1,168,692,533
2022-05	965,454,397
2022-06	997,797,478
2022-07	1,176,439,141
2022-08	1,310,552,787
2022-09	1,183,524,637
2022-10	894,565,131
2022-11	928,687,409
2022-12	1,325,160,922
2023-01	1,622,747,992
2023-02	1,326,288,861
2023-03	1,413,225,297
2023-04	1,135,016,164
2023-05	909,448,340
2023-06	896,587,875
2023-07	1,108,911,139
2023-08	1,209,310,584
2023-09	1,127,214,446
2023-10	894,571,385
2023-11	921,494,304
2023-12	1,361,644,555
2024-01	1,634,905,880
2024-02	1,446,896,352
2024-03	1,291,128,656
2024-04	1,130,225,216

(c) The total amount billed for generation supply charges for residential customers.

Month	Count
2018-01	$ 144,694,169.47
2018-02	$ 119,080,924.15
2018-03	$ 108,997,610.81
2018-04	$ 103,041,118.11
2018-05	$ 76,332,678.65
2018-06	$ 74,919,588.40
2018-07	$ 91,489,770.63
2018-08	$ 96,215,662.98
2018-09	$ 99,452,941.19
2018-10	$ 73,681,942.48
2018-11	$ 80,049,011.39
2018-12	$ 110,031,234.53
2019-01	$ 126,223,194.77
2019-02	$ 128,933,140.42

Business Use

2019-03	$ 111,763,097.70
2019-04	$ 88,432,588.17
2019-05	$ 71,110,077.88
2019-06	$ 72,712,332.09
2019-07	$ 94,337,571.89
2019-08	$ 103,311,526.20
2019-09	$ 86,616,190.37
2019-10	$ 73,763,784.43
2019-11	$ 76,844,354.96
2019-12	$ 110,270,958.16
2020-01	$ 126,261,774.30
2020-02	$ 114,819,024.40
2020-03	$ 105,570,081.06
2020-04	$ 90,311,161.25
2020-05	$ 83,254,922.18
2020-06	$ 80,141,946.97
2020-07	$ 99,303,806.42
2020-08	$ 112,709,323.24
2020-09	$ 91,696,837.37
2020-10	$ 72,307,861.52
2020-11	$ 74,557,059.86
2020-12	$ 102,431,667.03
2021-01	$ 130,914,363.97
2021-02	$ 132,488,633.59
2021-03	$ 115,265,444.08
2021-04	$ 84,599,495.01
2021-05	$ 70,887,913.86
2021-06	$ 82,817,938.66
2021-07	$ 101,575,440.18
2021-08	$ 98,989,602.91
2021-09	$ 99,073,670.49
2021-10	$ 74,485,251.67
2021-11	$ 80,208,986.03
2021-12	$ 120,549,962.22
2022-01	$ 155,154,413.47
2022-02	$ 159,999,839.91
2022-03	$ 129,299,858.01
2022-04	$ 110,144,565.19
2022-05	$ 91,972,176.47
2022-06	$ 105,073,442.55
2022-07	$ 139,085,316.63
2022-08	$ 156,937,367.26
2022-09	$ 143,307,889.35
2022-10	$ 109,643,844.22

Business Use

2022-11	$ 114,817,698.97
2022-12	$ 172,467,449.83
2023-01	$ 225,580,945.94
2023-02	$ 187,308,965.25
2023-03	$ 193,818,806.50
2023-04	$ 155,512,695.97
2023-05	$ 123,596,985.69
2023-06	$ 117,078,547.96
2023-07	$ 135,623,492.61
2023-08	$ 146,846,897.46
2023-09	$ 136,591,162.20
2023-10	$ 108,063,570.18
2023-11	$ 110,931,570.02
2023-12	$ 159,284,752.42
2024-01	$ 184,058,634.24
2024-02	$ 162,148,279.06
2024-03	$ 144,755,279.74
2024-04	$ 126,668,496.34

(d) The total number of residential shopping customers.

Month	Count
2018-01	534,226
2018-02	534,282
2018-03	533,557
2018-04	533,167
2018-05	530,789
2018-06	525,285
2018-07	523,137
2018-08	520,285
2018-09	518,245
2018-10	516,579
2018-11	514,157
2018-12	511,876
2019-01	506,739
2019-02	504,283
2019-03	501,466
2019-04	497,911
2019-05	495,444
2019-06	493,042
2019-07	490,212
2019-08	488,381
2019-09	486,176
2019-10	484,658
2019-11	482,613

Business Use

2019-12	481,392
2020-01	480,252
2020-02	480,737
2020-03	480,814
2020-04	481,170
2020-05	480,658
2020-06	480,241
2020-07	479,968
2020-08	478,454
2020-09	476,741
2020-10	474,592
2020-11	473,869
2020-12	472,709
2021-01	470,426
2021-02	469,639
2021-03	467,576
2021-04	465,967
2021-05	462,105
2021-06	458,295
2021-07	453,845
2021-08	450,157
2021-09	443,631
2021-10	436,874
2021-11	435,133
2021-12	433,108
2022-01	429,507
2022-02	425,333
2022-03	420,026
2022-04	413,727
2022-05	430,743
2022-06	456,890
2022-07	451,456
2022-08	447,300
2022-09	443,275
2022-10	438,955
2022-11	441,715
2022-12	447,264
2023-01	455,001
2023-02	472,278
2023-03	484,076
2023-04	489,853
2023-05	492,906
2023-06	494,949
2023-07	495,738

Business Use

2023-08	497,249
2023-09	497,458
2023-10	498,504
2023-11	499,146
2023-12	499,576
2024-01	500,385
2024-02	500,851
2024-03	500,652
2024-04	500,727

(e) The total usage of residential shopping customers.

Month	Count
2018-01	867,721,646
2018-02	706,994,597
2018-03	643,999,529
2018-04	616,123,017
2018-05	442,247,078
2018-06	432,928,437
2018-07	526,478,294
2018-08	549,051,057
2018-09	566,999,496
2018-10	420,680,149
2018-11	456,335,609
2018-12	632,295,459
2019-01	721,810,375
2019-02	732,623,915
2019-03	630,051,603
2019-04	494,040,302
2019-05	396,895,257
2019-06	398,869,858
2019-07	502,443,469
2019-08	546,156,480
2019-09	457,671,656
2019-10	388,916,593
2019-11	400,774,144
2019-12	572,289,640
2020-01	653,641,404
2020-02	590,771,179
2020-03	546,211,287
2020-04	468,122,196
2020-05	432,864,328
2020-06	423,737,307
2020-07	530,918,767
2020-08	599,798,627

Business Use

2020-09	487,217,121
2020-10	383,217,801
2020-11	393,472,876
2020-12	538,959,794
2021-01	686,895,458
2021-02	688,304,104
2021-03	605,276,555
2021-04	437,761,754
2021-05	361,815,483
2021-06	417,135,143
2021-07	497,213,327
2021-08	477,296,116
2021-09	466,486,248
2021-10	341,792,743
2021-11	363,107,728
2021-12	500,371,513
2022-01	596,365,528
2022-02	613,178,296
2022-03	490,663,011
2022-04	407,619,832
2022-05	354,204,300
2022-06	391,542,961
2022-07	461,271,885
2022-08	507,065,833
2022-09	455,093,622
2022-10	338,073,272
2022-11	350,333,884
2022-12	491,395,992
2023-01	633,461,566
2023-02	480,165,059
2023-03	614,488,667
2023-04	485,853,008
2023-05	404,270,149
2023-06	394,253,095
2023-07	482,072,607
2023-08	526,335,498
2023-09	493,092,472
2023-10	392,740,003
2023-11	399,524,890
2023-12	587,798,273
2024-01	708,164,180
2024-02	622,769,684
2024-03	555,552,047
2024-04	487,829,883

Business Use

(f) The total amount billed for generation supply charges for residential shopping customers.

Month	Count
2018-01	$ 73,401,805.96
2018-02	$ 60,075,545.24
2018-03	$ 55,031,344.69
2018-04	$ 51,566,266.88
2018-05	$ 38,866,874.44
2018-06	$ 37,370,455.40
2018-07	$ 45,211,751.77
2018-08	$ 47,270,080.47
2018-09	$ 48,578,807.54
2018-10	$ 35,964,062.58
2018-11	$ 38,727,221.28
2018-12	$ 53,384,886.69
2019-01	$ 62,068,230.91
2019-02	$ 63,329,775.44
2019-03	$ 54,146,583.68
2019-04	$ 42,481,708.30
2019-05	$ 34,265,584.22
2019-06	$ 34,715,315.51
2019-07	$ 43,700,981.95
2019-08	$ 47,632,756.22
2019-09	$ 39,762,194.79
2019-10	$ 33,766,276.74
2019-11	$ 34,733,918.69
2019-12	$ 49,241,639.34
2020-01	$ 56,386,078.71
2020-02	$ 51,205,204.96
2020-03	$ 46,957,803.13
2020-04	$ 40,166,270.38
2020-05	$ 36,987,252.10
2020-06	$ 36,049,863.44
2020-07	$ 45,137,216.43
2020-08	$ 50,882,338.17
2020-09	$ 41,256,182.17
2020-10	$ 32,489,568.11
2020-11	$ 33,310,023.47
2020-12	$ 45,495,653.17
2021-01	$ 57,496,288.69
2021-02	$ 57,645,871.79
2021-03	$ 50,608,180.10
2021-04	$ 37,078,346.26
2021-05	$ 31,033,552.02

Business Use

2021-06	$ 36,066,326.29
2021-07	$ 43,583,806.99
2021-08	$ 42,347,454.96
2021-09	$ 42,055,979.13
2021-10	$ 31,711,118.17
2021-11	$ 33,930,370.12
2021-12	$ 48,236,193.20
2022-01	$ 59,013,525.53
2022-02	$ 61,518,063.73
2022-03	$ 49,574,896.50
2022-04	$ 41,837,369.18
2022-05	$ 37,125,070.82
2022-06	$ 41,819,717.85
2022-07	$ 50,625,071.63
2022-08	$ 57,352,341.61
2022-09	$ 53,008,368.78
2022-10	$ 40,686,895.65
2022-11	$ 43,158,176.58
2022-12	$ 61,999,478.78
2023-01	$ 81,029,923.80
2023-02	$ 63,552,720.79
2023-03	$ 77,031,539.39
2023-04	$ 60,606,522.27
2023-05	$ 49,788,922.53
2023-06	$ 48,545,875.36
2023-07	$ 59,329,486.95
2023-08	$ 63,788,107.05
2023-09	$ 59,513,692.87
2023-10	$ 47,104,485.61
2023-11	$ 47,540,444.08
2023-12	$ 68,430,120.34
2024-01	$ 81,572,006.88
2024-02	$ 71,029,287.28
2024-03	$ 63,438,856.52
2024-04	$ 55,649,890.54

(g) The total number of residential default service customers.

Month	Count
2018-01	729,106
2018-02	728,262
2018-03	732,834
2018-04	736,270
2018-05	740,620
2018-06	746,754

Business Use

2018-07	749,295
2018-08	753,972
2018-09	751,911
2018-10	756,690
2018-11	756,557
2018-12	756,757
2019-01	762,431
2019-02	764,112
2019-03	772,121
2019-04	777,495
2019-05	782,920
2019-06	784,787
2019-07	789,384
2019-08	792,180
2019-09	791,081
2019-10	793,169
2019-11	793,526
2019-12	794,614
2020-01	793,923
2020-02	793,795
2020-03	796,180
2020-04	791,209
2020-05	794,538
2020-06	799,411
2020-07	802,905
2020-08	805,640
2020-09	807,672
2020-10	810,354
2020-11	809,454
2020-12	810,888
2021-01	811,594
2021-02	812,220
2021-03	817,887
2021-04	819,630
2021-05	825,923
2021-06	834,635
2021-07	835,981
2021-08	841,292
2021-09	844,651
2021-10	852,145
2021-11	854,169
2021-12	855,429
2022-01	858,434
2022-02	861,215

Business Use

2022-03	869,812
2022-04	877,927
2022-05	864,201
2022-06	839,523
2022-07	843,377
2022-08	850,510
2022-09	851,963
2022-10	856,902
2022-11	853,023
2022-12	846,551
2023-01	843,491
2023-02	827,892
2023-03	815,570
2023-04	806,187
2023-05	808,248
2023-06	807,201
2023-07	806,927
2023-08	808,458
2023-09	805,175
2023-10	804,527
2023-11	802,088
2023-12	800,382
2024-01	799,357
2024-02	797,880
2024-03	800,068
2024-04	803,701

(h) The total usage of residential default service customers.

Month	Count
2018-01	949,385,936
2018-02	786,538,711
2018-03	720,202,147
2018-04	686,982,655
2018-05	499,248,252
2018-06	500,219,967
2018-07	618,100,446
2018-08	653,906,940
2018-09	680,333,517
2018-10	504,535,861
2018-11	552,969,354
2018-12	772,740,092
2019-01	904,047,735
2019-02	925,990,851
2019-03	813,099,761

Business Use

2019-04	648,919,301
2019-05	520,854,892
2019-06	520,401,572
2019-07	665,296,827
2019-08	731,385,016
2019-09	615,842,888
2019-10	525,584,026
2019-11	553,712,896
2019-12	800,185,193
2020-01	912,405,960
2020-02	831,014,999
2020-03	765,815,794
2020-04	655,323,740
2020-05	604,649,601
2020-06	587,369,226
2020-07	741,692,956
2020-08	846,501,468
2020-09	690,547,666
2020-10	545,097,986
2020-11	564,974,451
2020-12	778,455,512
2021-01	1,000,433,930
2021-02	1,019,910,478
2021-03	880,604,285
2021-04	647,788,446
2021-05	543,052,390
2021-06	627,011,725
2021-07	766,538,848
2021-08	748,395,066
2021-09	752,966,285
2021-10	564,588,711
2021-11	610,882,942
2021-12	858,742,112
2022-01	1,038,938,821
2022-02	1,096,276,536
2022-03	887,498,923
2022-04	761,072,701
2022-05	611,250,097
2022-06	606,254,517
2022-07	715,167,256
2022-08	803,486,954
2022-09	728,431,015
2022-10	556,491,859
2022-11	578,353,525

Business Use

2022-12	833,764,930
2023-01	989,286,426
2023-02	846,123,802
2023-03	798,736,630
2023-04	649,163,156
2023-05	505,178,191
2023-06	502,334,780
2023-07	626,838,532
2023-08	682,975,086
2023-09	634,121,974
2023-10	501,831,382
2023-11	521,969,414
2023-12	773,846,282
2024-01	926,741,700
2024-02	824,126,668
2024-03	735,576,609
2024-04	642,395,333

(i) The total amount billed for generation supply charges for residential default service customers.

Month	Count
2018-01	$ 71,292,363.51
2018-02	$ 59,005,378.91
2018-03	$ 53,966,266.12
2018-04	$ 51,474,851.23
2018-05	$ 37,465,804.21
2018-06	$ 37,549,133.00
2018-07	$ 46,278,018.86
2018-08	$ 48,945,582.51
2018-09	$ 50,874,133.65
2018-10	$ 37,717,879.90
2018-11	$ 41,321,790.11
2018-12	$ 56,646,347.84
2019-01	$ 64,154,963.86
2019-02	$ 65,603,364.98
2019-03	$ 57,616,514.02
2019-04	$ 45,950,879.87
2019-05	$ 36,844,493.66
2019-06	$ 37,997,016.58
2019-07	$ 50,636,589.94
2019-08	$ 55,678,769.98
2019-09	$ 46,853,995.58
2019-10	$ 39,997,507.69
2019-11	$ 42,110,436.27
2019-12	$ 61,029,318.82

Business Use

2020-01	$ 69,875,695.59
2020-02	$ 63,613,819.44
2020-03	$ 58,612,277.93
2020-04	$ 50,144,890.87
2020-05	$ 46,267,670.08
2020-06	$ 44,092,083.53
2020-07	$ 54,166,589.99
2020-08	$ 61,826,985.07
2020-09	$ 50,440,655.20
2020-10	$ 39,818,293.41
2020-11	$ 41,247,036.39
2020-12	$ 56,936,013.86
2021-01	$ 73,418,075.28
2021-02	$ 74,842,761.80
2021-03	$ 64,657,263.98
2021-04	$ 47,521,148.75
2021-05	$ 39,854,361.84
2021-06	$ 46,751,612.37
2021-07	$ 57,991,633.19
2021-08	$ 56,642,147.95
2021-09	$ 57,017,691.36
2021-10	$ 42,774,133.50
2021-11	$ 46,278,615.91
2021-12	$ 72,313,769.02
2022-01	$ 96,140,887.94
2022-02	$ 98,481,776.18
2022-03	$ 79,724,961.51
2022-04	$ 68,307,196.01
2022-05	$ 54,847,105.65
2022-06	$ 63,253,724.70
2022-07	$ 88,460,245.00
2022-08	$ 99,585,025.65
2022-09	$ 90,299,520.57
2022-10	$ 68,956,948.57
2022-11	$ 71,659,522.39
2022-12	$ 110,467,971.05
2023-01	$ 144,551,022.14
2023-02	$ 123,756,244.46
2023-03	$ 116,787,267.11
2023-04	$ 94,906,173.70
2023-05	$ 73,808,063.16
2023-06	$ 68,532,672.60
2023-07	$ 76,294,005.66
2023-08	$ 83,058,790.41

Business Use

2023-09	$ 77,077,469.33
2023-10	$ 60,959,084.57
2023-11	$ 63,391,125.94
2023-12	$ 90,854,632.08
2024-01	$ 102,486,627.36
2024-02	$ 91,118,991.78
2024-03	$ 81,316,423.22
2024-04	$ 71,018,605.80

(j) The total number of CLI customers

Month	Count
2018-01	186,859
2018-02	188,483
2018-03	189,885
2018-04	190,864
2018-05	190,582
2018-06	190,069
2018-07	190,154
2018-08	190,422
2018-09	189,625
2018-10	190,243
2018-11	189,657
2018-12	189,351
2019-01	191,058
2019-02	192,297
2019-03	194,382
2019-04	195,507
2019-05	194,663
2019-06	192,721
2019-07	192,465
2019-08	191,873
2019-09	191,595
2019-10	191,655
2019-11	190,983
2019-12	191,627
2020-01	192,856
2020-02	194,141
2020-03	195,219
2020-04	195,009
2020-05	195,185
2020-06	195,326
2020-07	194,970
2020-08	194,462
2020-09	194,240

Business Use

2020-10	196,119
2020-11	198,648
2020-12	201,349
2021-01	204,116
2021-02	207,069
2021-03	210,552
2021-04	211,039
2021-05	210,770
2021-06	210,877
2021-07	209,645
2021-08	209,621
2021-09	209,626
2021-10	210,058
2021-11	210,798
2021-12	211,874
2022-01	214,459
2022-02	216,730
2022-03	219,269
2022-04	220,142
2022-05	220,506
2022-06	219,864
2022-07	219,538
2022-08	220,498
2022-09	219,761
2022-10	220,537
2022-11	221,290
2022-12	223,178
2023-01	227,270
2023-02	230,101
2023-03	231,527
2023-04	231,301
2023-05	231,343
2023-06	229,995
2023-07	231,748
2023-08	231,564
2023-09	231,617
2023-10	233,016
2023-11	233,768
2023-12	235,537
2024-01	238,608
2024-02	240,574
2024-03	242,542
2024-04	244,648

Business Use

(k) The total usage of CLI customers.

Month	Count
2018-01	336,520,278
2018-02	286,102,702
2018-03	264,453,286
2018-04	253,795,458
2018-05	174,644,445
2018-06	155,038,975
2018-07	184,123,312
2018-08	194,700,643
2018-09	200,018,274
2018-10	153,922,085
2018-11	186,347,129
2018-12	267,381,388
2019-01	311,236,539
2019-02	320,928,166
2019-03	285,443,759
2019-04	224,784,607
2019-05	166,725,048
2019-06	152,212,579
2019-07	186,548,582
2019-08	203,894,486
2019-09	172,977,180
2019-10	153,481,749
2019-11	176,358,891
2019-12	263,673,577
2020-01	300,801,326
2020-02	279,938,196
2020-03	259,096,438
2020-04	217,341,468
2020-05	196,303,421
2020-06	173,530,113
2020-07	207,239,491
2020-08	233,803,381
2020-09	193,174,834
2020-10	162,501,570
2020-11	179,594,028
2020-12	257,498,922
2021-01	335,694,420
2021-02	350,337,494
2021-03	310,300,177
2021-04	220,594,934
2021-05	176,039,816
2021-06	188,432,771

Business Use

2021-07	220,514,379
2021-08	214,683,143
2021-09	213,845,819
2021-10	164,578,582
2021-11	191,254,858
2021-12	281,529,330
2022-01	341,351,486
2022-02	367,450,739
2022-03	301,480,942
2022-04	253,017,942
2022-05	200,038,161
2022-06	188,106,461
2022-07	217,108,205
2022-08	241,112,280
2022-09	219,790,246
2022-10	176,472,181
2022-11	195,102,775
2022-12	291,728,926
2023-01	360,522,235
2023-02	318,106,107
2023-03	321,555,089
2023-04	258,689,216
2023-05	196,139,698
2023-06	181,259,629
2023-07	218,249,805
2023-08	234,707,767
2023-09	219,057,960
2023-10	183,105,235
2023-11	203,169,428
2023-12	314,440,210
2024-01	381,460,375
2024-02	346,293,773
2024-03	311,851,786
2024-04	270,078,283

(l) The total amount billed for generation supply charges for all CLI customers.

Month	Count
2018-01	$ 27,432,257.58
2018-02	$ 23,348,545.25
2018-03	$ 21,570,227.47
2018-04	$ 20,443,018.82
2018-05	$ 14,474,667.11
2018-06	$ 12,689,003.53
2018-07	$ 14,966,940.98

Business Use

2018-08	$ 15,772,414.54
2018-09	$ 16,159,420.31
2018-10	$ 12,408,429.56
2018-11	$ 14,916,402.64
2018-12	$ 21,119,451.23
2019-01	$ 24,241,358.89
2019-02	$ 25,026,512.55
2019-03	$ 22,141,755.32
2019-04	$ 17,402,543.48
2019-05	$ 12,946,225.50
2019-06	$ 12,132,858.24
2019-07	$ 15,239,227.40
2019-08	$ 16,646,266.32
2019-09	$ 14,112,552.42
2019-10	$ 12,540,243.51
2019-11	$ 14,339,746.60
2019-12	$ 21,376,656.87
2020-01	$ 24,464,058.59
2020-02	$ 22,834,938.83
2020-03	$ 21,098,460.10
2020-04	$ 17,691,283.51
2020-05	$ 15,952,081.57
2020-06	$ 13,935,360.97
2020-07	$ 16,341,938.39
2020-08	$ 18,437,434.93
2020-09	$ 15,247,377.98
2020-10	$ 12,818,480.72
2020-11	$ 14,115,834.72
2020-12	$ 20,185,659.13
2021-01	$ 26,266,549.39
2021-02	$ 27,404,660.27
2021-03	$ 24,315,479.91
2021-04	$ 17,365,156.35
2021-05	$ 13,928,926.38
2021-06	$ 15,102,766.60
2021-07	$ 17,886,182.73
2021-08	$ 17,485,944.55
2021-09	$ 17,496,996.44
2021-10	$ 13,613,868.94
2021-11	$ 15,756,239.46
2021-12	$ 25,093,521.94
2022-01	$ 32,869,246.23
2022-02	$ 34,763,897.38
2022-03	$ 28,577,511.55

Business Use

2022-04	$ 24,078,153.06
2022-05	$ 19,180,101.76
2022-06	$ 20,267,797.59
2022-07	$ 26,727,834.47
2022-08	$ 29,940,412.70
2022-09	$ 27,546,615.83
2022-10	$ 22,336,452.73
2022-11	$ 24,780,157.80
2022-12	$ 39,041,633.47
2023-01	$ 52,052,227.17
2023-02	$ 46,260,288.56
2023-03	$ 46,221,442.25
2023-04	$ 37,098,945.25
2023-05	$ 27,989,404.62
2023-06	$ 24,617,118.31
2023-07	$ 27,287,968.03
2023-08	$ 29,194,019.19
2023-09	$ 27,189,621.61
2023-10	$ 22,687,520.73
2023-11	$ 25,031,838.97
2023-12	$ 37,452,268.93
2024-01	$ 43,425,281.70
2024-02	$ 39,337,402.34
2024-03	$ 35,440,501.74
2024-04	$ 30,709,352.26

(m) The total number of CLI customers who are not enrolled in PPL's Customer Assistance Program, OnTrack (herein

Month	Count
2018-01	137,265
2018-02	139,746
2018-03	139,098
2018-04	137,625
2018-05	136,163
2018-06	134,692
2018-07	133,260
2018-08	132,932
2018-09	131,358
2018-10	131,172
2018-11	130,470
2018-12	132,823
2019-01	135,660
2019-02	136,367
2019-03	136,275
2019-04	134,361

Business Use

2019-05	132,427
2019-06	130,823
2019-07	130,371
2019-08	129,298
2019-09	128,837
2019-10	127,864
2019-11	125,996
2019-12	128,349
2020-01	132,849
2020-02	134,847
2020-03	134,923
2020-04	132,417
2020-05	132,189
2020-06	131,897
2020-07	131,245
2020-08	129,871
2020-09	129,097
2020-10	130,289
2020-11	132,588
2020-12	135,503
2021-01	138,169
2021-02	140,424
2021-03	143,162
2021-04	143,363
2021-05	143,190
2021-06	144,167
2021-07	143,598
2021-08	143,863
2021-09	144,127
2021-10	144,687
2021-11	146,131
2021-12	147,216
2022-01	149,128
2022-02	150,710
2022-03	152,546
2022-04	152,699
2022-05	153,296
2022-06	152,862
2022-07	152,050
2022-08	152,490
2022-09	151,611
2022-10	151,961
2022-11	152,583
2022-12	154,263

Business Use

2023-01	157,905
2023-02	159,981
2023-03	161,413
2023-04	161,046
2023-05	161,099
2023-06	160,212
2023-07	162,848
2023-08	161,341
2023-09	159,959
2023-10	159,114
2023-11	158,730
2023-12	160,047
2024-01	162,381
2024-02	164,390
2024-03	166,530
2024-04	168,213

(n) The total usage of all non-CAP CLI customers.

Month	Count
2018-01	234,183,890
2018-02	201,242,224
2018-03	182,667,283
2018-04	171,244,765
2018-05	118,163,993
2018-06	107,159,309
2018-07	128,089,531
2018-08	134,636,115
2018-09	137,378,901
2018-10	103,694,894
2018-11	120,625,041
2018-12	175,774,656
2019-01	208,365,110
2019-02	214,292,674
2019-03	187,521,838
2019-04	144,365,713
2019-05	107,876,506
2019-06	101,058,003
2019-07	125,767,522
2019-08	137,790,531
2019-09	115,615,172
2019-10	100,193,063
2019-11	109,544,257
2019-12	164,745,116
2020-01	196,065,758

Business Use

2020-02	183,215,624
2020-03	168,393,779
2020-04	139,508,790
2020-05	126,344,121
2020-06	115,055,508
2020-07	139,675,502
2020-08	156,858,828
2020-09	128,047,034
2020-10	105,087,792
2020-11	113,742,531
2020-12	162,927,769
2021-01	213,623,779
2021-02	221,853,864
2021-03	197,326,929
2021-04	140,717,654
2021-05	113,734,634
2021-06	125,686,853
2021-07	149,954,122
2021-08	146,336,250
2021-09	145,992,561
2021-10	111,038,802
2021-11	126,697,578
2021-12	184,555,305
2022-01	224,185,192
2022-02	239,894,604
2022-03	196,873,288
2022-04	164,962,118
2022-05	131,781,651
2022-06	127,968,909
2022-07	149,036,083
2022-08	165,897,959
2022-09	150,682,591
2022-10	117,972,218
2022-11	128,107,555
2022-12	189,890,007
2023-01	239,671,234
2023-02	201,122,547
2023-03	213,437,341
2023-04	170,862,543
2023-05	131,222,139
2023-06	123,678,684
2023-07	152,703,376
2023-08	163,040,769
2023-09	151,093,983

Business Use

2023-10	121,617,392
2023-11	131,317,342
2023-12	201,572,343
2024-01	244,954,668
2024-02	222,886,943
2024-03	201,619,172
2024-04	174,708,133

(o) The total amount billed for generation supply charges for all non-CAP CLI customers.

Month	Count
2018-01	$ 19,183,324.67
2018-02	$ 16,532,248.92
2018-03	$ 15,027,327.31
2018-04	$ 13,905,359.97
2018-05	$ 9,892,267.38
2018-06	$ 8,845,229.56
2018-07	$ 10,531,765.00
2018-08	$ 11,049,179.09
2018-09	$ 11,262,533.64
2018-10	$ 8,488,609.99
2018-11	$ 9,808,782.93
2018-12	$ 14,112,431.59
2019-01	$ 16,562,036.84
2019-02	$ 17,114,977.57
2019-03	$ 14,916,572.64
2019-04	$ 11,478,680.14
2019-05	$ 8,602,611.14
2019-06	$ 8,247,804.75
2019-07	$ 10,481,006.22
2019-08	$ 11,493,932.94
2019-09	$ 9,632,647.48
2019-10	$ 8,372,530.26
2019-11	$ 9,121,024.07
2019-12	$ 13,650,333.40
2020-01	$ 16,263,512.84
2020-02	$ 15,241,977.00
2020-03	$ 13,984,048.80
2020-04	$ 11,591,194.62
2020-05	$ 10,489,877.19
2020-06	$ 9,455,003.17
2020-07	$ 11,292,434.39
2020-08	$ 12,688,997.25
2020-09	$ 10,382,180.36
2020-10	$ 8,524,722.15

Business Use

2020-11	$ 9,200,391.55
2020-12	$ 13,129,876.61
2021-01	$ 17,149,274.77
2021-02	$ 17,803,482.00
2021-03	$ 15,842,705.08
2021-04	$ 11,357,873.48
2021-05	$ 9,231,262.40
2021-06	$ 10,324,842.12
2021-07	$ 12,458,164.91
2021-08	$ 12,225,052.86
2021-09	$ 12,275,235.64
2021-10	$ 9,489,090.57
2021-11	$ 10,794,580.50
2021-12	$ 16,888,487.52
2022-01	$ 21,946,368.78
2022-02	$ 23,179,827.19
2022-03	$ 19,069,472.11
2022-04	$ 16,087,326.71
2022-05	$ 12,984,796.16
2022-06	$ 13,963,761.93
2022-07	$ 18,285,221.80
2022-08	$ 20,606,316.56
2022-09	$ 18,963,323.36
2022-10	$ 15,070,760.50
2022-11	$ 16,465,832.40
2022-12	$ 25,527,365.42
2023-01	$ 34,394,373.94
2023-02	$ 29,159,292.66
2023-03	$ 30,416,831.50
2023-04	$ 24,263,471.94
2023-05	$ 18,501,953.50
2023-06	$ 16,756,145.03
2023-07	$ 19,312,008.37
2023-08	$ 20,478,303.49
2023-09	$ 18,928,574.83
2023-10	$ 15,217,904.41
2023-11	$ 16,305,781.38
2023-12	$ 24,214,866.02
2024-01	$ 28,338,727.05
2024-02	$ 25,701,222.06
2024-03	$ 23,264,948.03
2024-04	$ 20,176,188.36

(p) The total number of all CAP customers

Business Use

Month	Count
2018-01	49,594
2018-02	48,737
2018-03	50,787
2018-04	53,239
2018-05	54,419
2018-06	55,377
2018-07	56,894
2018-08	57,490
2018-09	58,267
2018-10	59,071
2018-11	59,187
2018-12	56,528
2019-01	55,398
2019-02	55,930
2019-03	58,107
2019-04	61,146
2019-05	62,236
2019-06	61,898
2019-07	62,094
2019-08	62,575
2019-09	62,758
2019-10	63,791
2019-11	64,987
2019-12	63,278
2020-01	60,007
2020-02	59,294
2020-03	60,296
2020-04	62,592
2020-05	62,996
2020-06	63,429
2020-07	63,725
2020-08	64,591
2020-09	65,143
2020-10	65,830
2020-11	66,060
2020-12	65,846
2021-01	65,947
2021-02	66,645
2021-03	67,390
2021-04	67,676
2021-05	67,580
2021-06	66,710
2021-07	66,047

Business Use

2021-08	65,758
2021-09	65,499
2021-10	65,371
2021-11	64,667
2021-12	64,658
2022-01	65,331
2022-02	66,020
2022-03	66,723
2022-04	67,443
2022-05	67,210
2022-06	67,002
2022-07	67,488
2022-08	68,008
2022-09	68,150
2022-10	68,576
2022-11	68,707
2022-12	68,915
2023-01	69,365
2023-02	70,120
2023-03	70,114
2023-04	70,255
2023-05	70,244
2023-06	69,783
2023-07	68,900
2023-08	70,223
2023-09	71,658
2023-10	73,902
2023-11	75,038
2023-12	75,490
2024-01	76,227
2024-02	76,184
2024-03	76,012
2024-04	76,435

(q) The total usage of all CAP customers

Month	Count
2018-01	102,336,388
2018-02	84,860,478
2018-03	81,786,003
2018-04	82,550,693
2018-05	56,480,452
2018-06	47,879,666
2018-07	56,033,781
2018-08	60,064,528

Business Use

2018-09	62,639,373
2018-10	50,227,191
2018-11	65,722,088
2018-12	91,606,732
2019-01	102,871,429
2019-02	106,635,492
2019-03	97,921,921
2019-04	80,418,894
2019-05	58,848,542
2019-06	51,154,576
2019-07	60,781,060
2019-08	66,103,955
2019-09	57,362,008
2019-10	53,288,686
2019-11	66,814,634
2019-12	98,928,461
2020-01	104,735,568
2020-02	96,722,572
2020-03	90,702,659
2020-04	77,832,678
2020-05	69,959,300
2020-06	58,474,605
2020-07	67,563,989
2020-08	76,944,553
2020-09	65,127,800
2020-10	57,413,778
2020-11	65,851,497
2020-12	94,571,153
2021-01	122,070,641
2021-02	128,483,630
2021-03	112,973,248
2021-04	79,877,280
2021-05	62,305,182
2021-06	62,745,918
2021-07	70,560,257
2021-08	68,346,893
2021-09	67,853,258
2021-10	53,539,780
2021-11	64,557,280
2021-12	96,974,025
2022-01	117,166,294
2022-02	127,556,135
2022-03	104,607,654
2022-04	88,055,824

Business Use

2022-05	68,256,510
2022-06	60,137,552
2022-07	68,072,122
2022-08	75,214,321
2022-09	69,107,655
2022-10	58,499,963
2022-11	66,995,220
2022-12	101,838,919
2023-01	120,851,001
2023-02	116,983,560
2023-03	108,117,748
2023-04	87,826,673
2023-05	64,917,559
2023-06	57,580,945
2023-07	65,546,429
2023-08	71,666,998
2023-09	67,963,977
2023-10	61,487,843
2023-11	71,852,086
2023-12	112,867,867
2024-01	136,505,707
2024-02	123,406,830
2024-03	110,232,614
2024-04	95,370,150

(r) The total amount billed for generation supply charges for all CAP customers before CAP credit was applied.

Month	Count	
2018-01	$	8,248,932.91
2018-02	$	6,816,296.33
2018-03	$	6,542,900.16
2018-04	$	6,537,658.85
2018-05	$	4,582,399.73
2018-06	$	3,843,773.97
2018-07	$	4,435,175.98
2018-08	$	4,723,235.45
2018-09	$	4,896,886.67
2018-10	$	3,919,819.57
2018-11	$	5,107,619.71
2018-12	$	7,007,019.64
2019-01	$	7,679,322.05
2019-02	$	7,911,534.98
2019-03	$	7,225,182.68
2019-04	$	5,923,863.34
2019-05	$	4,343,614.36

Business Use

2019-06	$	3,885,053.49
2019-07	$	4,758,221.18
2019-08	$	5,152,333.38
2019-09	$	4,479,904.94
2019-10	$	4,167,713.25
2019-11	$	5,218,722.53
2019-12	$	7,726,323.47
2020-01	$	8,200,545.75
2020-02	$	7,592,961.83
2020-03	$	7,114,411.30
2020-04	$	6,100,088.89
2020-05	$	5,462,204.38
2020-06	$	4,480,357.80
2020-07	$	5,049,504.00
2020-08	$	5,748,437.68
2020-09	$	4,865,197.62
2020-10	$	4,293,758.57
2020-11	$	4,915,443.17
2020-12	$	7,055,782.52
2021-01	$	9,117,274.62
2021-02	$	9,601,178.27
2021-03	$	8,472,774.83
2021-04	$	6,007,282.87
2021-05	$	4,697,663.98
2021-06	$	4,777,924.48
2021-07	$	5,428,017.82
2021-08	$	5,260,891.69
2021-09	$	5,221,760.80
2021-10	$	4,124,778.37
2021-11	$	4,961,658.96
2021-12	$	8,205,034.42
2022-01	$	10,922,877.45
2022-02	$	11,584,070.19
2022-03	$	9,508,039.44
2022-04	$	7,990,826.35
2022-05	$	6,195,305.60
2022-06	$	6,304,035.66
2022-07	$	8,442,612.67
2022-08	$	9,334,096.14
2022-09	$	8,583,292.47
2022-10	$	7,265,692.23
2022-11	$	8,314,325.40
2022-12	$	13,514,268.05
2023-01	$	17,657,853.23

Business Use

2023-02	$ 17,100,995.90
2023-03	$ 15,804,610.75
2023-04	$ 12,835,473.31
2023-05	$ 9,487,451.12
2023-06	$ 7,860,973.28
2023-07	$ 7,975,959.66
2023-08	$ 8,715,715.70
2023-09	$ 8,261,046.78
2023-10	$ 7,469,616.32
2023-11	$ 8,726,057.59
2023-12	$ 13,237,402.91
2024-01	$ 15,086,554.65
2024-02	$ 13,636,180.28
2024-03	$ 12,175,553.71
2024-04	$ 10,533,163.90

(s) The total number of residential non-CAP CLI shopping customers.

Month	Count
2018-01	60,155
2018-02	61,072
2018-03	60,597
2018-04	59,465
2018-05	58,691
2018-06	57,866
2018-07	56,971
2018-08	56,406
2018-09	55,806
2018-10	55,347
2018-11	55,230
2018-12	56,079
2019-01	56,504
2019-02	56,475
2019-03	55,979
2019-04	54,452
2019-05	53,408
2019-06	52,881
2019-07	52,396
2019-08	51,914
2019-09	51,473
2019-10	50,974
2019-11	50,519
2019-12	50,884
2020-01	51,544
2020-02	51,924

Business Use

2020-03	51,964
2020-04	51,680
2020-05	51,415
2020-06	51,075
2020-07	50,751
2020-08	50,259
2020-09	49,720
2020-10	49,814
2020-11	50,587
2020-12	51,305
2021-01	52,112
2021-02	52,707
2021-03	52,884
2021-04	52,694
2021-05	52,027
2021-06	51,767
2021-07	51,485
2021-08	51,457
2021-09	51,319
2021-10	51,179
2021-11	51,491
2021-12	51,762
2022-01	52,096
2022-02	52,420
2022-03	52,307
2022-04	51,369
2022-05	52,909
2022-06	55,401
2022-07	54,816
2022-08	54,446
2022-09	53,825
2022-10	53,593
2022-11	53,943
2022-12	55,210
2023-01	56,780
2023-02	58,983
2023-03	60,739
2023-04	61,652
2023-05	62,233
2023-06	62,629
2023-07	63,188
2023-08	62,953
2023-09	63,067
2023-10	63,520

Business Use

2023-11	63,817
2023-12	64,624
2024-01	65,652
2024-02	66,224
2024-03	66,618
2024-04	66,598

(t) The total usage of residential non-CAP CLI shopping customers.

Month	Count
2018-01	106,244,164
2018-02	90,160,281
2018-03	81,689,393
2018-04	76,660,367
2018-05	52,853,464
2018-06	47,853,916
2018-07	57,140,180
2018-08	59,396,251
2018-09	60,889,675
2018-10	45,616,595
2018-11	52,786,627
2018-12	76,563,394
2019-01	88,769,944
2019-02	90,812,136
2019-03	78,701,387
2019-04	59,751,014
2019-05	44,922,454
2019-06	42,574,839
2019-07	52,934,186
2019-08	57,671,613
2019-09	48,247,497
2019-10	41,528,696
2019-11	44,970,942
2019-12	66,489,437
2020-01	76,698,914
2020-02	70,783,678
2020-03	65,502,361
2020-04	54,968,377
2020-05	49,732,705
2020-06	45,673,841
2020-07	55,727,629
2020-08	62,604,520
2020-09	50,778,302
2020-10	41,200,060
2020-11	44,242,574

Business Use

2020-12	62,785,578
2021-01	82,008,780
2021-02	84,351,935
2021-03	75,555,974
2021-04	53,293,867
2021-05	42,600,424
2021-06	47,330,007
2021-07	56,245,538
2021-08	54,534,152
2021-09	53,928,876
2021-10	40,633,750
2021-11	45,966,152
2021-12	66,399,045
2022-01	80,030,023
2022-02	84,644,283
2022-03	69,105,289
2022-04	56,675,322
2022-05	47,104,797
2022-06	48,430,176
2022-07	56,668,070
2022-08	62,319,362
2022-09	56,243,752
2022-10	43,304,123
2022-11	46,724,024
2022-12	68,013,658
2023-01	89,719,190
2023-02	70,922,078
2023-03	86,503,893
2023-04	69,762,750
2023-05	55,811,270
2023-06	52,027,568
2023-07	63,194,164
2023-08	68,558,373
2023-09	64,324,928
2023-10	52,841,122
2023-11	56,176,860
2023-12	86,252,192
2024-01	105,441,163
2024-02	95,028,778
2024-03	85,388,309
2024-04	73,822,318

(u) The total amount billed for generation supply charges for non-CAP CLI shopping customers.

Month Count

Business Use

2018-01	$	9,540,993.37
2018-02	$	8,176,322.72
2018-03	$	7,435,257.10
2018-04	$	6,771,259.73
2018-05	$	4,952,580.97
2018-06	$	4,375,523.00
2018-07	$	5,202,549.69
2018-08	$	5,413,031.67
2018-09	$	5,513,012.86
2018-10	$	4,125,464.91
2018-11	$	4,722,880.62
2018-12	$	6,821,184.37
2019-01	$	8,046,527.53
2019-02	$	8,331,137.33
2019-03	$	7,165,883.11
2019-04	$	5,439,475.79
2019-05	$	4,124,733.71
2019-06	$	3,965,983.47
2019-07	$	4,919,303.15
2019-08	$	5,375,887.25
2019-09	$	4,497,183.81
2019-10	$	3,886,722.38
2019-11	$	4,195,213.14
2019-12	$	6,140,740.17
2020-01	$	7,103,150.85
2020-02	$	6,612,104.40
2020-03	$	6,086,787.61
2020-04	$	5,110,018.36
2020-05	$	4,620,717.03
2020-06	$	4,234,856.40
2020-07	$	5,152,704.53
2020-08	$	5,792,013.51
2020-09	$	4,727,262.06
2020-10	$	3,847,594.86
2020-11	$	4,113,867.98
2020-12	$	5,792,013.04
2021-01	$	7,477,768.72
2021-02	$	7,694,378.79
2021-03	$	6,876,879.63
2021-04	$	4,921,584.67
2021-05	$	3,995,239.74
2021-06	$	4,461,679.74
2021-07	$	5,349,596.32
2021-08	$	5,260,792.73

Business Use

2021-09	$	5,278,596.26
2021-10	$	4,133,903.43
2021-11	$	4,654,170.35
2021-12	$	6,913,919.99
2022-01	$	8,576,553.84
2022-02	$	9,196,814.51
2022-03	$	7,549,081.00
2022-04	$	6,308,096.45
2022-05	$	5,353,144.39
2022-06	$	5,648,380.23
2022-07	$	6,837,048.94
2022-08	$	7,738,670.89
2022-09	$	7,226,552.78
2022-10	$	5,791,052.72
2022-11	$	6,355,613.91
2022-12	$	9,357,308.46
2023-01	$	12,455,696.11
2023-02	$	10,097,452.21
2023-03	$	11,838,261.16
2023-04	$	9,472,753.01
2023-05	$	7,470,663.78
2023-06	$	6,966,205.25
2023-07	$	8,391,413.65
2023-08	$	8,948,901.31
2023-09	$	8,348,861.31
2023-10	$	6,842,357.83
2023-11	$	7,160,738.71
2023-12	$	10,653,180.10
2024-01	$	12,880,710.16
2024-02	$	11,542,361.58
2024-03	$	10,390,916.02
2024-04	$	8,982,548.22

(v) The total number of residential, non-CAP, default service CLI customers.

Month	Count
2018-01	77,110
2018-02	78,674
2018-03	78,501
2018-04	78,160
2018-05	77,472
2018-06	76,826
2018-07	76,289
2018-08	76,526
2018-09	75,552

Business Use

2018-10	75,825
2018-11	75,240
2018-12	76,744
2019-01	79,156
2019-02	79,892
2019-03	80,296
2019-04	79,909
2019-05	79,019
2019-06	77,942
2019-07	77,975
2019-08	77,384
2019-09	77,364
2019-10	76,890
2019-11	75,477
2019-12	77,465
2020-01	81,305
2020-02	82,923
2020-03	82,959
2020-04	80,737
2020-05	80,774
2020-06	80,822
2020-07	80,494
2020-08	79,612
2020-09	79,377
2020-10	80,475
2020-11	82,001
2020-12	84,198
2021-01	86,057
2021-02	87,717
2021-03	90,278
2021-04	90,669
2021-05	91,163
2021-06	92,400
2021-07	92,113
2021-08	92,406
2021-09	92,808
2021-10	93,508
2021-11	94,640
2021-12	95,454
2022-01	97,032
2022-02	98,290
2022-03	100,239
2022-04	101,330
2022-05	100,387

Business Use

2022-06	97,461
2022-07	97,234
2022-08	98,044
2022-09	97,786
2022-10	98,368
2022-11	98,640
2022-12	99,053
2023-01	101,125
2023-02	100,998
2023-03	100,674
2023-04	99,394
2023-05	98,866
2023-06	97,583
2023-07	99,660
2023-08	98,388
2023-09	96,892
2023-10	95,594
2023-11	94,913
2023-12	95,423
2024-01	96,729
2024-02	98,166
2024-03	99,912
2024-04	101,615

(w) The total usage of residential, non-CAP, default service CLI customers.

Month	Count
2018-01	127,939,726
2018-02	111,081,943
2018-03	100,977,890
2018-04	94,584,398
2018-05	65,310,529
2018-06	59,305,393
2018-07	70,949,351
2018-08	75,239,864
2018-09	76,489,226
2018-10	58,078,299
2018-11	67,838,414
2018-12	99,211,262
2019-01	119,595,166
2019-02	123,480,538
2019-03	108,820,451
2019-04	84,614,699
2019-05	62,954,052
2019-06	58,483,164

Business Use

2019-07	72,833,336
2019-08	80,118,918
2019-09	67,367,675
2019-10	58,664,367
2019-11	64,573,315
2019-12	98,255,679
2020-01	119,366,844
2020-02	112,431,946
2020-03	102,891,418
2020-04	84,540,413
2020-05	76,611,416
2020-06	69,381,667
2020-07	83,947,873
2020-08	94,254,308
2020-09	77,268,732
2020-10	63,887,732
2020-11	69,499,957
2020-12	100,142,191
2021-01	131,614,999
2021-02	137,501,929
2021-03	121,770,955
2021-04	87,423,787
2021-05	71,134,210
2021-06	78,356,846
2021-07	93,708,584
2021-08	91,802,098
2021-09	92,063,685
2021-10	70,405,052
2021-11	80,731,426
2021-12	118,156,260
2022-01	144,155,169
2022-02	155,250,321
2022-03	127,767,999
2022-04	108,286,796
2022-05	84,676,854
2022-06	79,538,733
2022-07	92,368,013
2022-08	103,578,597
2022-09	94,438,839
2022-10	74,668,095
2022-11	81,383,531
2022-12	121,876,349
2023-01	149,952,044
2023-02	130,200,469

Business Use

2023-03	126,933,448
2023-04	101,099,793
2023-05	75,410,869
2023-06	71,651,116
2023-07	89,509,212
2023-08	94,482,396
2023-09	86,769,055
2023-10	68,776,270
2023-11	75,140,482
2023-12	115,320,151
2024-01	139,513,505
2024-02	127,858,165
2024-03	116,230,863
2024-04	100,885,815

(x) The total amount billed for generation supply charges for non-CAP default service CLI customers.

Month	Count	
2018-01	$	9,642,331.30
2018-02	$	8,355,926.20
2018-03	$	7,592,070.21
2018-04	$	7,134,100.24
2018-05	$	4,939,686.41
2018-06	$	4,469,706.56
2018-07	$	5,329,215.31
2018-08	$	5,636,147.42
2018-09	$	5,749,520.78
2018-10	$	4,363,145.08
2018-11	$	5,085,902.31
2018-12	$	7,291,247.22
2019-01	$	8,515,509.31
2019-02	$	8,783,840.24
2019-03	$	7,750,689.53
2019-04	$	6,039,204.35
2019-05	$	4,477,877.43
2019-06	$	4,281,821.28
2019-07	$	5,561,703.07
2019-08	$	6,118,045.69
2019-09	$	5,135,463.67
2019-10	$	4,485,807.88
2019-11	$	4,925,810.93
2019-12	$	7,509,593.23
2020-01	$	9,160,361.99
2020-02	$	8,629,872.60
2020-03	$	7,897,261.19

Business Use

2020-04	$	6,481,176.26
2020-05	$	5,869,160.16
2020-06	$	5,220,146.77
2020-07	$	6,139,729.86
2020-08	$	6,896,983.74
2020-09	$	5,654,918.30
2020-10	$	4,677,127.29
2020-11	$	5,086,523.57
2020-12	$	7,337,863.57
2021-01	$	9,671,506.05
2021-02	$	10,109,103.21
2021-03	$	8,965,825.45
2021-04	$	6,436,288.81
2021-05	$	5,236,022.66
2021-06	$	5,863,162.38
2021-07	$	7,108,568.59
2021-08	$	6,964,260.13
2021-09	$	6,996,639.38
2021-10	$	5,355,187.14
2021-11	$	6,140,410.15
2021-12	$	9,974,567.53
2022-01	$	13,369,814.94
2022-02	$	13,983,012.68
2022-03	$	11,520,391.11
2022-04	$	9,779,230.26
2022-05	$	7,631,651.77
2022-06	$	8,315,381.70
2022-07	$	11,448,172.86
2022-08	$	12,867,645.67
2022-09	$	11,736,770.58
2022-10	$	9,279,707.78
2022-11	$	10,110,218.49
2022-12	$	16,170,056.96
2023-01	$	21,938,677.83
2023-02	$	19,061,840.45
2023-03	$	18,578,570.34
2023-04	$	14,790,718.93
2023-05	$	11,031,289.72
2023-06	$	9,789,939.78
2023-07	$	10,920,594.72
2023-08	$	11,529,402.18
2023-09	$	10,579,713.52
2023-10	$	8,375,546.58
2023-11	$	9,145,042.67

Business Use

2023-12	$	13,561,685.92
2024-01	$	15,458,016.89
2024-02	$	14,158,860.48
2024-03	$	12,874,032.01
2024-04	$	11,193,640.14

Business Use

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set II Interrogatories of
the Coalition for Affordable Utility Services and
Energy Efficiency in Pennsylvania (CAUSE-PA)
Dated May 20, 2024
Docket No. P-2024-3047290

CAUSE-PA II-11	Please update CAUSE-PA to PPL I-10 to include data for March and April, 2024.
PPL Response	See CAUSE-PA II-11 Attachment 1.

Year-Month	# Customers	Usage	Dollars
2021-06	2,479	2,335,431	$ 195,275.89
2021-07	2,543	2,892,772	$ 245,766.00
2021-08	2,557	2,798,658	$ 242,908.23
2021-09	2,545	2,856,991	$ 248,943.72
2021-10	2,632	2,255,744	$ 191,161.26
2021-11	2,672	2,683,296	$ 222,793.91
2021-12	2,761	4,148,921	$ 370,907.75
2022-01	2,894	5,027,909	$ 472,025.70
2022-02	2,869	5,237,546	$ 482,990.87
2022-03	2,945	4,554,947	$ 416,288.51
2022-04	2,929	3,868,443	$ 354,641.87
2022-05	2,998	3,089,200	$ 295,918.89
2022-06	3,134	3,091,179	$ 334,053.62
2022-07	3,160	3,580,523	$ 436,313.79
2022-08	3,174	3,911,353	$ 475,210.31
2022-09	3,082	3,538,971	$ 434,612.69
2022-10	3,049	2,727,426	$ 336,123.16
2022-11	3,087	3,036,707	$ 369,855.61
2022-12	3,049	3,312,933	$ 403,744.35
2023-01	3,049	2,067,866	$ 272,736.30
2023-02	3,229	9,485,245	$ 1,269,557.73
2023-03	3,369	5,040,100	$ 682,063.84
2023-04	3,425	4,034,723	$ 540,898.70
2023-05	3,412	3,193,441	$ 428,664.63
2023-06	3,370	3,113,372	$ 399,641.88
2023-07	3,362	3,453,939	$ 399,334.00
2023-08	3,301	3,817,315	$ 430,993.39
2023-09	3,290	3,418,788	$ 418,255.64
2023-10	3,388	3,654,429	$ 420,714.38
2023-11	3,374	3,635,486	$ 443,199.45
2023-12	3,445	5,325,610	$ 606,352.17
2024-01	3,435	6,037,688	$ 645,816.87
2024-02	3,425	5,317,145	$ 555,952.32
2024-03	3,411	4,730,530	$ 499,921.54
2024-04	3,448	4,305,809	$ 468,809.22

Business Use

WITNESS: Melinda Stumpf

PPL Electric Utilities Corporation
Response to the Set I Data Request of the
Office of Consumer Advocate
Dated 3/22/2024
Docket No. P-2024-3047290

OCA I-14 How many CAP customers are served by EGSs at the time of their enrollment?

PPL Response See OCA I-14 Attachment 1 for the count of customers who dropped their supplier and were enrolled in OnTrack and the count of customers who failed to drop their supplier within 14 days.

	Served by Supplier - Dropped for OnTrack Enrollment	Served by Supplier - Did not drop within 14 days for OnTrack enrollment	Total served by supplier at the time of OnTrack approval
2021(June - December)	3,432	1,304	4,736
2022	6,011	2,301	8,312
2023	5,814	3,256	9,070
2024 (January - March)	1,300	476	1,776

WITNESS: Andy Castanaro

PPL Electric Utilities Corporation
Response to the Set I Data Request of the
Office of Consumer Advocate
Dated 3/22/2024
Docket No. P-2024-3047290

OCA I-32 Provide any analysis of bill amounts for TOU customers compared to what such customers would have paid on the applicable non-TOU rate since January 2021.

PPL Response In 2021, TOU customers paid a combined $401,009.11. These customers would have paid $418,867.28 on Default Service at the PTC.

In 2022, TOU customers paid a combined $847,080.69. These customers would have paid $892,055.47on Default Service at the PTC.

In 2023, TOU customers paid a combined $1,330,911.04. These customers would have paid$1,429,841.65 on Default Service at the PTC.

For 2024 YTD, TOU customers have paid a combined $342,624.69. These customers would have paid $364,841.11 on Default Service at the PTC.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029	: : :	Docket No. P-2024-3047290

REBUTTAL TESTIMONY OF HARRY S. GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

July 1, 2024

PREPARED REBUTTAL TESTIMONY OF HARRY GELLER

Q. Please state your name, occupation, and business address.

A. Harry Geller. I am an attorney. Though I am currently retired, I maintain an office at the Pennsylvania Utility Law Project (PULP), 118 Locust St., Harrisburg, PA 17101 and serve as a consultant to organizations representing the low income and their clients. Since the Governor's Emergency Order regarding the Covid-19 pandemic, I have been working from 4213 Orchard Hill Rd, Harrisburg, PA, 17110.

Q: Did you submit direct testimony in this proceeding?

A: Yes. My direct testimony was premarked as CAUSE-PA Statement 1.

Q. Please state the purpose of your rebuttal testimony.

A: The purpose of my rebuttal testimony is to respond to the Direct Testimony of Joseph Oliker on behalf of the Retail Energy Supply Association.

As I indicated in my direct testimony, the unfortunate reality is that residential ratepayers, in significant numbers, have entered and participated in the competitive market and have not received the bill savings they were promised and were expecting. This problem has not been caused by the continued existence of default service in its present form, or by PPL's consumer education efforts. but by suppliers themselves. The solution to this clear and prolonged pattern of excessive charges is not to make default service more expensive for those who have made a choice not to shop, to circumvent critical protections for residential consumers, or to stifle consumer education. Indeed, the Commission has repeatedly rejected attempts to do so in the past – both in individual utility proceedings and in the context of comprehensive statewide investigations. Rather, the Commission must take steps to reform existing "retail market enhancement" programs to prevent further harm caused by excessive competitive market prices. Such reforms should

include, at minimum, affirmation of the role of utilities in educating consumers; elimination of PPL's SOP; and improved protections for low income shopping customers outlined in my direct testimony.

I note that a number of issues raised in the direct testimony of Mr. Oliker in this proceeding involve legal interpretations and questions that are properly reserved for briefing. I will not comment on any issues which are strictly legal in nature, or which otherwise do not require additional factual context or information for the purpose of this rebuttal testimony

Moreover, my silence in response to any witnesses' direct testimony in this proceeding should not be construed as an agreement therewith. Unless required for context or clarification in providing a further response to other parties' direct testimony, I will not reiterate the extensive arguments, evidence, and recommendations that I provided in my direct testimony. Rather, to the extent an argument raised by any party was already sufficiently addressed in my direct testimony, I do not intend to respond, and stand firmly on the evaluation, analysis, and recommendations contained in my direct testimony. Nothing proposed by any other witness to this point in the proceeding has changed my initial conclusions or recommendations.

I. Default Service

Q: Please summarize Mr. Oliker's testimony regarding Pennsylvania's default service model, and the state of the competitive electric markets in Pennsylvania.

A: In summarizing Pennsylvania' default service model, Mr. Oliker reviews selected policy pronouncements in the Choice Act, and establishes the roles – as he sees them – of the Commission, electric distribution companies (EDCs), electric generation suppliers (EGSs), and default service in the provision of electricity to Pennsylvania consumers. (RESA St. 1 at 6-9). Mr. Oliker asserts that default service is not an appropriate comparison because it is procured through

a prudent mix of laddered contracts to achieve the least cost to consumers over time – as opposed to relying on real-time wholesale market pricing. (RESA St. 1 at 10-12). He argues that PPL does not include indirect costs "on a total basis" through default service rates, and laments that PPL has "brand name recognition" and suggests that it is somehow a competitive advantage for PPL to fulfill its statutory obligation to send a bill to customers each month. (RESA St. 1 at 11). He argues that suppliers "find themselves needing to consider the EDC provided default service rate" in pricing their products, which he asserts is "harmful to EGSs and the competitive market."

Mr. Oliker next addresses the current status of retail competition in Pennsylvania. After reciting selective excepts from the Commission's 2013 Retail Market Investigations Order, issued more than a decade ago, Mr. Oliker goes on to express his dissatisfaction with the declining number of shopping customers in PPL's service territory, and concludes that the market is "stagnant." (RESA St. 1 at 13-14).

To redress his grievance with Pennsylvania's default service model, Mr. Oliker seeks initiation of a statewide investigation, arguing that the Commission should transform default service from a prudent, least-cost option to an option that "more closely resembles market conditions." (RESA St. 1 at 16). As a "first step", Mr. Oliker argues that the Commission should focus on messaging – specifically, "discontinuance of the term 'Price to Compare' or "PTC", "given the inherently misleading nature of comparisons." (Id.).

Q: Is default service "harmful"?

A: No, absolutely not. Default service is a statutorily created product that provides a safe, stable option for service – ensuring Pennsylvanians have a prudent product to rely on for life-essential energy service. As I detailed at length in my direct testimony, residential consumers are paying substantially higher rates in the competitive market, resulting in substantially higher accrual

of arrears, payment trouble rates, involuntary termination rates, and a cascade of consequences to the health, safety, and general wellbeing that quickly follows the loss of electricity to a home. (CAUSE-PA St. 1 at 8-12; CAUSE-PA Exhibit 1). This is especially true for PPL's low income customers, who are uniquely harmed by higher pricing in the competitive market. (CAUSE-PA St. 1 at 12-20; CAUSE-PA Exhibit 2). The solution to excessive pricing in the competitive residential energy market is not to make default service more expensive or to transition default service to rely more heavily on volatile spot-market pricing, as that will only further compound the issue – making it harder for Pennsylvania's lowest income families to stay connected to vital energy services in their home.

Q: Do you agree with Mr. Oliker's recommendation that the Commission initiate a statewide investigation to examine default service messaging, and to eliminate term Price to Compare (PTC)?

A: No. The Commission should not make decisions about statewide policy in the context of reviewing an individual utility's Default Service Plan. If RESA seeks to initiate a statewide proceeding, it should file a Petition with the Commission.

I also fundamentally disagree with the premise of Mr. Oliker's recommendation to eliminate the term Price to Compare – or PTC. Default service provides a statutorily mandated point of comparison and is appropriately referred to as the PTC – allowing consumers a fair opportunity to compare offers for purchasing electricity to their home. The PTC is a straightforward and recognizable concept, and provides the only stable point of comparison of the actual commodity cost – allowing consumers to identify and compare the unit cost of the commodity they are buying, and fairly weigh other terms and conditions of the offer against the cost they will pay. The ability to make a simple comparison of unit prices is essential for the

purchase of a commodity as critical to life functions as home electricity. If consumers value other qualities, such as renewable energy, they can and will weigh the comparison accordingly – and can do so with the full knowledge and information about the relative value and cost of those other attributes.

The grocery store provides an excellent example to illustrate the important function of the PTC to the competitive market. In the grocery store, consumers are provided with simple labels that provide a comparable, per-unit price for each product.[1] For example, there may be three cans of beans on the shelf, one generic, one name brand, and one organic. Each can of beans may be different sizes and may have a different price, but consumers can look to the grocer's label to make a comparison of the per unit price for each can of beans – deciding for themselves whether they want to pay more per unit for organic, low sodium, or other potential attributes. The same basic per-unit comparison that shoppers can make for beans must – at a minimum – remain true for life-sustaining home energy, ensuring the generic PTC rate remains available as a point of comparison for consumers to examine against various supplier offers to determine for themselves whether they want to pay more for specific attributes of a supplier offer. Ultimately, I submit that the PTC is appropriately named, and serves a critical consumer education function by helping ensure consumers are equipped to make fully informed decisions about the price they wish to pay for home energy services.

[1] See Dep't of Commerce, Nat'l Inst. of Standards & Tech., Unit Pricing Guide: A Best Practice Approach to Unit Pricing, NIST Special Pub. 1181 (2015), https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1181.pdf.

II. Customer Education

Q: Please summarize Mr. Oliker's testimony regarding customer education.

A: Mr. Oliker declares that PPL "has no role in communicating with customers of EGSs regarding their supply contracts or prices." (RESA St. 1 at 21). He argues that the Commission should direct PPL to "refrain from independently communicating with shopping customers about their EGS contracts," including customers participating in PPL's SOP. (Id.) He asserts that, if the Commission "believes more consumer education is necessary," it should first examine the issue on a statewide basis to establish Commission oversight of utility messaging and the frequency of that messaging. (Id. at 22).

Mr. Oliker frames PPL's educational efforts as an effort " 'win back'" customers to default service, and asserts that PPL's communications "contain a number of objectionable components." (Id.) He then describes the "objectionable components" from two PPL communications, and takes issue with PPL's advice to consumers to "check their energy supply contracts", including when their contract expires and the rate that will be charged at the end of the contract term. (Id. at 25). He is especially incensed that PPL identified the customer's actual supply price and the name and contact information for the customer's current supplier, and explained the options a customer has at the end of the contract period. (Id.) He argues that PPL's communications are overly focused on price and result in "driving customers to supplier call centers." (Id. at 26.) Mr. Oliker also takes issue with PPL's legally required notice of the right for customers to protect their information from disclosure by opting out of inclusion on the Eligible Customer List (ECL). (Id. at 28).

Q: Does Mr. Oliker allege that PPL's communications contain false or inaccurate information?

A: Mr. Oliker alleges broadly that PPL's communications are "misleading, sometimes inaccurate, and has no reasonable role in the competitive marketplace." (RESA St. 1 at 39). However, at no point does he expressly identify information contained in the communications which is demonstrably false or inaccurate. The information Mr. Oliker finds objectionable includes very basic, factual information about the amount a customer is charged, the name of their supplier, and the options available to them. It also appears as though he is upset that PPL complied with its legal obligation to clearly inform consumers about their right to opt out of the ECL – though he did not identify anything about the notice that was false, inaccurate, or misleading. The fact is, ECL provides a significant benefit to suppliers in their effort to increase consumer participation in the competitive market. The Commission has determined consumers should be notified of its existence and have the right to opt-out. I am not at all surprised that consumers are concerned when they understand that their information is handed over to suppliers unless they affirmatively opt-out – rather than being given the opportunity to opt-in to affirmatively share their information.

In reviewing each of PPL's communications, it appears to me that PPL's messaging merely encourages customers to actively shop and provides the information necessary for a consumer to compare terms and conditions to select a product that is right for them. While PPL's communications informed consumers of their options, I was unable to identify any instance where PPL's communications instructed consumers on what option to select or misled consumers about their choices. Rather, PPL's communications appropriately empower consumers with the basic, factual information and tools necessary to make an ***informed*** choice about their energy supply.

Indeed, I fail to see how it is "objectionable" to inform consumers about the price they are paying for electricity, the name and contact information for their supplier in case they have questions, and the options available to them going forward.

The fact is, PPL's communications provide basic, factual information to its customers which may assist them as they evaluate their options and make an informed choice about their energy supply. Recommendations to prevent PPL from providing basic, objective information to its customers regarding critical matters concerning consumer choice would result in withholding important information from consumers and would make it more difficult for consumers to fairly engage in the market. The upshot would be that consumers would remain in the dark about whether they are shopping, how to stop unwanted contacts, who their supplier is, how to contact their supplier if they have questions, and the options available to them if they choose to switch.

Q: Does PPL have a role in customer education about supplier pricing?

A: Yes, absolutely. Not only does PPL have a role in consumer education, it has an obligation to communicate with consumers paying high rates for energy to help reduce collections costs and prevent the accrual of uncollectible debts, which are ultimately passed on to consumers through PPL's Purchase of Receivables (POR) program.

Restricting PPL's ability to communicate basic information about the cost a consumer pays for energy – including their applicable supply rate and the name and contact information for their supplier – would impact a host of other statutory and regulatory obligations that a public utility must fulfill. [2] This includes PPL's legal responsibility for billing, collections, and terminations; its role in switching; and the operation of its programs – each of which will be addressed more thoroughly through briefing.

[2] See 66 Pa. C.S. Ch 14; §§ 2802(9), (10), (17); 2803; 2804(9); 1301; 1401.1

I am particularly concerned that restricting PPL's ability to communicate with shopping customers about their supply rate would prevent PPL from conducting robust universal service program outreach and education – and would infringe on the ability of PPL to ensure low income customers are able to access critical rate assistance through PPL's Customer Assistance Program (CAP), known as OnTrack. As I explained in Direct Testimony, PPL has a process in place to protect CAP customers from excessive, disproportionately high supplier pricing and, in turn, to ensure its universal service programs are cost effective. (CAUSE-PA St. 1 at 13-20, 31-37). If PPL is unable to communicate directly with consumers about their supplier, it would be unable to assist economically vulnerable shopping customers to enroll in CAP. Indeed, Mr. Oliker's recommendation would effectively ban PPL from disclosing the name of the customer's supplier or the price they pay for supply service.

If the Commission were to prohibit or penalize PPL for educating consumers about their options, energy usage, charges, and other facets of their energy bills, it would severely and negatively impact all public utilities' willingness and ability to provide essential consumer education and outreach services on a broad range of topics. The Commission must not set a precedent that would chill communications between utilities and utility consumers in this manner, as it could have far-ranging impacts on collections costs and would make it difficult to access universal service programs.

I am advised by Counsel for CAUSE-PA that the broad range of legal aspects associated with this issue will be further addressed through briefing.

Q: You note that Mr. Oliker believes PPL's communications are overly focused on price, and that many consumers value other aspects of a supplier's offers. How do you respond?

A: As I mentioned above, in discussing the important role of the PTC, it is certainly true that some consumers choose to prioritize other attributes of a competitive energy offer that are unrelated to cost, such as the ability to purchase renewable energy. This is especially true for those with discretionary income who can afford to pay more for energy services. But for many (likely most) customers, cost remains the primary or exclusive motivating factor – *especially for low income customers who are struggling to maintain service to their home.* As I documented extensively in my Direct Testimony, confirmed low income shopping customers in PPL's service territory are consistently charged ***substantially*** higher rates than residential customers as a whole – adding hundreds of dollars to already unaffordable home energy costs. (CAUSE-PA St. 1 at 13-20; CAUSE-PA Exhibit 2).

These disproportionately high charges for confirmed low income customers are exacerbating widespread energy insecurity and resulting high levels of payment trouble, involuntary terminations, and collections expenses. When compared to the general residential customer class as a whole, a disproportionate percentage of PPL's confirmed low income customers are "payment troubled" (59.1% of PPL's payment troubled residential customers are confirmed low income) and/or have an active payment arrangement (61% of all active payment arrangements are held by confirmed low income customers).[3] In turn, confirmed low income customers face significantly higher rates of involuntary termination (10.8%) compared to the residential customer class as a whole (2.8%).[4]

[3] Pa. PUC, 2022 Report on Universal Service and Collections Performance, at 11, https://www.puc.pa.gov/media/2573/2022-universal-service-report-final.pdf.
[4] Id. at 15-16.

PPL's efforts to educate consumers about the price they are paying for electricity are critical to ensuring that economically vulnerable Pennsylvanians are empowered with the information necessary to make an informed choice about their energy provider, in turn helping to control high rates of payment trouble, termination, and uncollectible expenses in furtherance of its explicit statutory obligations.

Regardless of the motivating factor(s) driving an individual consumer to select an energy provider, all residential consumers should have access to clear and transparent information about the price they are paying for energy and the options available to them so they can make a truly informed choice about their energy provider.

Q: Is there any evidence to suggest that PPL's communications have helped to improve the competitive market?

A: Yes. Consumer education initiatives, such as the initiative undertaken by PPL, benefit the competitive retail market, as it encourages active, informed, and engaged shopping. When consumers are burned by unexpectedly high prices in the market, they are less likely to return and are more likely to tell their family, friends, and neighbors to stay away. I believe that unanticipated high prices are likely the primary factor causing stagnation in the market. As I noted above, although there are certainly some consumers who make informed decisions to pay more for energy, high prices should never catch a consumer by surprise. When high prices catch consumers off-guard, it can serve to undermine trust in the market – causing consumers to ***choose*** to remain with default service, which is their statutory right to do.

As illustrated in CAUSE-PA Exhibits 1 and 2, appended to my Direct Testimony, PPL's consumer education initiatives appear to have had some success in assisting consumers to make an informed choice about their energy supplier. As indicated in response to discovery, PPL sent

educational communications to shopping customers in May, June, November, and December 2021; October and November 2022; April and November 2023; and February and April 2024.[5] In the month succeeding PPL's communications, residential shopping consumers in several instances increased the level of aggregate savings achieved and/or decreased the average rates paid over the default service price.

For example, in November 2021, residential shopping customers were charged an average of $15.02 more than the default service price. In December 2021, following PPL's targeted educational messaging through November and December 2021, residential shopping customers were charged an average of $1.59 more than the default service price – helping to substantially reduce the high level of excessive charges in the competitive market. (CAUSE-PA Exhibit 1). The same was true for confirmed low income customers. In November 2021, confirmed low income shopping customers were charged an average of $23.04 more than the applicable default service price. (CAUSE-PA Exhibit 1). In December 2021, following PPL's communications, confirmed low income customers were charged an average of $11.68 more than the applicable default service price – helping reduce the impact of unnecessarily high rates. (CAUSE-PA Exhibit 2).

PPL's educational efforts have not always resulted in a net positive for residential and confirmed low income customers. In some months following PPL's direct communications, there was little to no change at all in average price paid by residential shopping customers – and in some instances, there was a slight increase in the price differential. (CAUSE-PA Exhibit 1 and 2). This fact that results went in both directions after PPL communications were sent demonstrates the unbiased nature of PPL's information and certainly does not negate the potential positive impacts

[5] CAUSE-PA to PPL II-12, Attachment 1.

of consumer education. It does, however, cut directly against Mr. Oliker's claim that PPL's messaging is somehow harmful to competition.

In reviewing the data, it further appears that PPL's educational efforts have not had any appreciable impact on the number of customers actively shopping for residential service. (CAUSE-PA Exhibits 1 and 2). There was not a single month following PPL's communications that shopping engagement increased or decreased by more than 5,000 customers (1% of residential shopping customers). (Id.) In fact, it appears that competitive market engagement levels more often *increased* following PPL's communications. (Id.)

Notably, while potentially impactful, the success of PPL's educational efforts are short-lived, indicating a need for robust, *ongoing* educational efforts to ensure an informed and engaged consumer base.

Q: Mr. Oliker argues that PPL's communications are not educational in nature. (RESA St. 1 at 29-30). How do you respond?

A: In support of his argument that PPL's communications are not educational, Mr. Oliker points to Commission orders from 1998, 2000, and 2012, which directed utilities to send educational materials to consumers about the competitive market. (RESA St. 1 at 29-30). He argues that these educational efforts were different from PPL's current efforts because they were more general in nature, and were "highly controlled" by the Commission. (Id.)

Education is more successful when a consumer can relate to the information. Inclusion of individualized information does not make it somehow different from consumer education, it merely assists a consumer to apply the information to their own situation. Consumer education has evolved substantially since 1998, 2000, and even 2012. With advancements in technology, utilities are able to conduct more personalized consumer education and provide more detailed information.

I also disagree with Mr. Oliker's legal analysis of the Commission's 1998, 2000, and 2012 Orders, and I am advised by Counsel that the applicability of the 1998, 2000, and 2012 Orders will be addressed in briefing.

Q: Mr. Oliker also analyzes the Commission's Order in PPL's last Default Service Plan proceeding, arguing this Order further supports RESA's position that PPL should be ordered to cease educational efforts. How do you respond?

A: I believe that Mr. Oliker's testimony is incorrect in his analysis of the Commission's 2020 Order regarding PPL's last DSP. (RESA St. 1 at 32-35). I will address the issues of fact and am advised by Counsel that the issues of law will be address through briefing.

First, the Commission's 2020 Order disallowed PPL's SOP proposal, based on the applicable record evidence at the time. In doing so, the Commission disallowed the proposed communications associated with the proposal.[6] However, the Commission in no way prohibited PPL from engaging in other consumer education activities – including education about a consumer's options at the end of the SOP term. Indeed, Mr. Oliker fails to note that in approving the Order, then-Chairman Brown Dutrieuille was explicit in her support for PPL's educational efforts, noting: "*I encourage PPL to continue to educate customers about the shopping options available to them at the end of the SOP*."[7]

Contrary to Mr. Oliker's assertion, the consumer education and information provided by PPL to residential consumers in recent months highlights basic and transparent information about the consumer's current energy costs and the ways a consumer can exercise their right to choose,

[6] Petition of PPL Electric Utilities Corp. for Approval of Its Default Service Plan for the Period June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356, Opinion and Order, at 92-100 (Dec. 17, 2020).
[7] Petition of PPL Electric Utilities Corp. for Approval of Its Default Service Plan for the Period June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356, Statement of Chairman Brown Dutrieuille, at 2 (Dec. 17, 2020).

and in no way denigrates competitive suppliers or promotes default service. Indeed, the communications at issue bear no resemblance to the proposed communications in PPL's Default Service Plan proceeding and were in no way foreclosed by the Commission's Order in that proceeding.

III. Standard Offer Program

Q: Please summarize Mr. Oliker's testimony regarding PPL's Standard Offer Program.

A: Mr. Oliker takes issue with PPL's proposals to modify its Standard Offer Program to ensure that consumers who enroll in the SOP are fully informed and educated about the SOP and are empowered to gain confidence in the market without exposing participants to price spikes at the end of the term. (RESA St. 1 at 39-46). He argues against PPL's proposal to return customers to default service at the end of the program if they fail to affirmatively select a new supplier. He argues in the alternative that, if the Commission is concerned with the excessive pricing at the end of the SOP, it should eliminate the 7% discount – requiring only that suppliers provide an initial price equal to the default service rate – and should cease marketing the SOP as a "guaranteed savings" program. (RESA St. 1 at 41, 49).

Mr. Oliker advances a few arguments in support of his positions, claiming: (1) that the required supplier options notice are adequate to inform consumers about price changes at the end of the SOP, (2) that the proposal will effectively end the SOP due to lack of supplier participation, and (3) that PPL's proposal would be tantamount to unlawful slamming. (RESA St. 1 at 41-45). He argues that permitting PPL to communicate with shopping customers about the SOP "is of grave concern" and argues that it is "troubling" for PPL to explain the rules of the SOP to potential enrollees. Mr. Oliker, on behalf of RESA, is expressly opposed to any attempts for PPL to notify

customers at the time of enrollment about their rights at the conclusion of the SOP term. (RESA St. 1 at 45).

Mr. Oliker goes on to further explicitly counter PPL's alternative proposal to increase program communications at the conclusion of the SOP to ensure participants know the program has ended. (RESA St. at 47). Indeed, Mr. Oliker apparently takes issue with any attempt of PPL to inform SOP participants about their rights at the outset, during, or at the conclusion of the SOP program period.

Finally, Mr. Oliker argues against PPL's proposal to increase the SOP referral fee from $28 to $33 to match the market rate for vendor services. (RESA St. 1 at 49). He does not provide any contradictory evidence about the cost of vendor services. Instead, he laments that the increased referral fee will decrease the "likely attractiveness to the EGSs of participating in the SOP" - which he submits will "harm[] the ability of customers to avail themselves of this EGS product." (RESA St. 1 at 49-50).

Q: What is your response to Mr. Oliker's claims regarding PPL's SOP proposals?

A: First, Mr. Oliker's assertion that PPL's proposal is tantamount to slamming is factually incorrect. On one hand, he asserts that PPL is proposing to move customers back to default service at the conclusion of the contract "before receiving the customer's consent to do so" – yet on the other hand, on the very next page of his testimony, he acknowledges that PPL's proposal would require participants "to consent to this return to default service as a condition of enrollment." (RESA St. 1 at 44-45). Both assertions simply cannot be true. The truth is, PPL's proposal seeks to ensure that SOP participants understand key information about the SOP, and their associated rights and obligations, *before* customers enroll in the program. PPL's proposal is not slamming,

as it expressly contemplates providing a clear disclosure of the customers' rights and obtaining affirmative consent from potential SOP participants at the time they enter the program.

Further, I note that the Commission's authority to approve program rules, such as the SOP rules proposed by PPL in this case, is well settled and will be addressed through briefing. Nevertheless, setting the legal issues aside, I note that if the Commission has the authority to approve the SOP – which restricts supplier terms and pricing – it would be incongruous to conclude that the Commission lacks authority to institute other *program terms*, including those terms which govern the treatment of SOP participants who do not affirmatively elect a new contract at the conclusion of the program.

In addition, I note that Mr. Oliker's generally asserted prediction that it is highly likely that PPL's proposed SOP modifications would result in EGS non-participation is speculative, totally unsubstantiated, and similar unsupported pronouncements in the course of past DSP proceedings have not materialized.

Finally, I note that the data outlined by PPL in its direct testimony clearly dispel Mr. Oliker's assertion that currently required options notices are, by themselves, adequate to ensure SOP participants are adequately and appropriately informed about their rights and options at the end of the contract term.

Q: What is your opinion about Mr. Oliker's alternative proposal, that the SOP cease providing a 7% discount on the default service price at the start of the program, and that PPL in turn cease marketing the program as a "guaranteed savings" program?

A: I strongly agree with Mr. Oliker that the SOP, *if permitted to continue following this case*, should not be marketed as a guaranteed savings program. The program, in its current form, does not provide guaranteed savings over the program term. While providing an initial discount off the

price to compare at the time of enrollment, that discount is often short-lived and is only guaranteed until the next change in the default service rate. (CAUSE-PA St. 1 at 27).

Notwithstanding my support for the elimination of false promises of "guaranteed" savings within the program, I strongly disagree with Mr. Oliker's suggestion of eliminating the initial discount in its entirety. While illusory for some, it is nevertheless the one potential consumer benefit to the program. As I explained in my Direct Testimony, the SOP should be discontinued in its entirety. The program has failed to achieve its explicit goals and, instead, has contributed to excessive supplier pricing – providing a passive "on-ramp" to the competitive market without a streamlined, protective "off-ramp" for inattentive customers to avoid the potentially significant financial consequences if they happen to miss a deadline. (CAUSE-PA St. 1 at 27). The financial consequences to an inattentive consumer can be severe. As documented in my Direct Testimony, following conclusion of the SOP term, hundreds of former SOP participants were paying over $.25/kWh – and thousands were paying in excess of $.19/kWh. (Id. at 28-29) While this deep financial impact may be an inconvenience for some, it can cause severe consequences to health, safety, and wellbeing for economically vulnerable consumers. As such, if the SOP is to be continued, Mr. Oliker's proposal to eliminate the introductory discount from the SOP should be denied. The appropriate action I recommend is that the program should either be discontinued or substantially amended to incorporate the amendments proposed by PPL.

Q: Does this conclude your Rebuttal Testimony?

A: Yes.