

October 7, 2024

**VIA ELECTRONIC FILING**

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

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

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order dated September 17, 2024, enclosed for filing please find a copy of FirstEnergy Pennsylvania Electric Company's ("FE PA") Further Amended Universal Service and Energy Conservation Plan ("USECP") for the years 2024 through 2028. Also, attached to the end of the filing is a redlined copy of the plan to reflect the changes that were made in order to comply with the Commission's Orders.

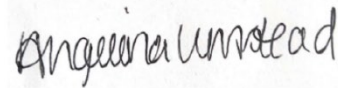
Specifically, FE PA has modified its security deposit refund language to explicitly include customers who receive a Low-Income Home Energy Assistance Program ("LIHEAP") grant as directed by the Commission. Please note that this change will take place in December 2024 as it requires some technical programming changes. Additionally, FE PA has modified the language in the WARM program's health and safety budget section to reflect the original language filed in the USECP.

As an additional matter, please note that FE PA has removed language reflecting how it will utilize the Department of Human Services LIHEAP data sharing for automatic recertification into its customer assistance program. FE PA prematurely incorporated this language into its USECP and intends to amend the plan at a later date to add this language back in once approved.

Rosemary Chiavetta  
October 7, 2024  
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Please feel free to reach out with any questions or concerns.

Very truly yours,

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

Angelina Umstead

AU/dml

Enclosure

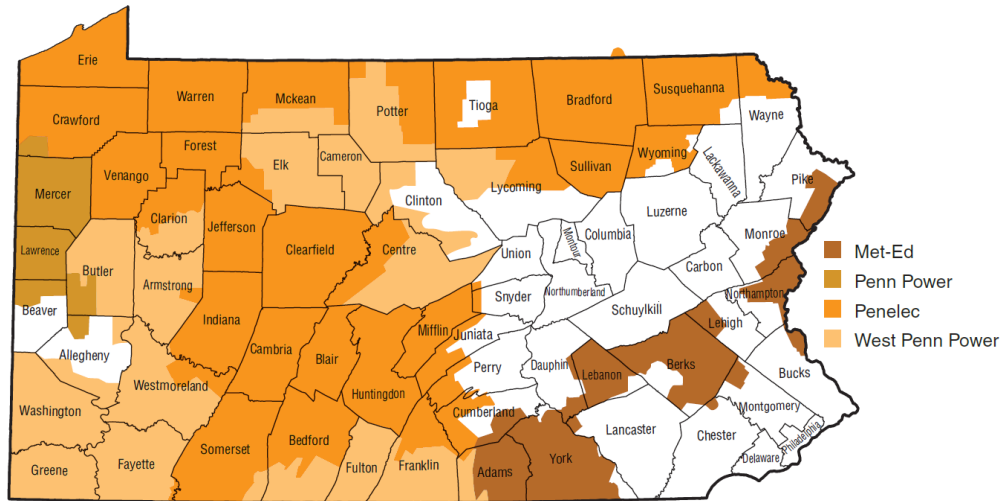
c: As Per Certificate of Service  
Joseph Magee, Bureau of Consumer Services ([jmagee@pa.gov](mailto:jmagee@pa.gov))  
Jennifer Johnson, Bureau of Consumer Services ([jennifjohn@pa.gov](mailto:jennifjohn@pa.gov))  
Regina Carter, Bureau of Consumer Services ([regincarte@pa.gov](mailto:regincarte@pa.gov))  
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Louise Fink Smith, Law Bureau ([finksmith@pa.gov](mailto:finksmith@pa.gov))



**Further Amended Joint Universal Service & Energy Conservation Plan**

**Program Years 2024-2028**

**FirstEnergy Pennsylvania Electric Company**



**October 7, 2024**

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## Introduction

FirstEnergy Pennsylvania Electric Company's ("FE PA" or the "Company")<sup>1</sup> Joint 2024 - 2028 Universal Service and Energy Conservation Plan ("USECP") is provided to the Pennsylvania Public Utility Commission ("Commission") in accordance with Universal Service and Energy Conservation Reporting Requirements at 52 Pa. Code §§ 54.71-54.78 and the 2019 Amendments to the Policy Statement on Customer Assistance Programs ("CAP Policy Statement"), 52 Pa. Code §§ 69.261–69.267.

The Company is committed to providing customer-focused, quality-driven, results-oriented Universal Service and Energy Conservation Programs<sup>2</sup> in a cost-effective and holistic manner.

The goals of the Company's Universal Service and Energy Conservation Programs are to:

- Protect consumers' health and safety by helping low-income customers maintain affordable utility service.
- Provide for affordable utility service by making available payment assistance to low-income customers.
- Help low-income customers conserve energy and reduce residential utility bills through participation in the WARM program, the Company's Low Income Usage Reduction Program ("LIURP").
- Ensure Universal Service and Energy Conservation Programs are operated in a cost-effective and efficient manner.

The Company will continue to work with eligible customers in establishing affordable payment agreements that maintain electric service and move them toward self-sufficiency in paying their electric bill.

Beginning in 2017, the Company, through its predecessor electric distribution companies ("EDCs"), established a Universal Service Advisory Committee ("USAC") comprised of representatives from the Company, the Pennsylvania Office of Consumer Advocate ("OCA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Commission's Bureau of Investigation and Enforcement ("BI&E"), the Commission's Bureau of Consumer Service ("BCS") and the organizations that administer the Company's USECP, which holds meetings quarterly with respect to the Company's programs and other relevant data points relating to customer service and remote

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<sup>1</sup> On January 1, 2024, FirstEnergy's Pennsylvania operating companies (*i.e.*, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) merged into FirstEnergy Pennsylvania Electric Company. Due to the Pennsylvania Consolidation ("PA Consolidation") transaction, the affected operating companies' tariffs were consolidated into a single tariff, with each former operating company's rates becoming its own rate district: Met-Ed Rate District ("Met-Ed"), Penelec Rate District ("Penelec"), Penn Power Rate District ("Penn Power"), and West Penn Rate District ("West Penn").

<sup>2</sup> As defined in Section 2803 of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2803, "universal service and energy conservation" refers to those "policies, protections and services that help low-income customers to maintain electric service. The term includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education."

terminations.<sup>3</sup> In addition to the parties mentioned above, the Company has recruited representatives from local community agencies. The USAC's purpose is to explore opportunities for enhancements to the Company's USECP programs, as well as opportunities for outreach and education, language access, notification to low-income customers regarding topics of interest to include security deposit waivers and bill clarity. At the Company's sole discretion, process or program changes raised through the USAC may be filed for approval with the Commission as proposed revisions to the Company's USECP on a case-by-case basis.

### Consumer Group Representation

Pennsylvania Utility Law Project  
Community Legal Services of Philadelphia  
Office of Consumer Advocate

### Regulatory Representation

Bureau of Consumer Services

All costs associated with the Company's USECP are funded through the Company's Universal Service Cost Rider.

This plan describes the Company's portfolio of USECP programs for the program years 2024-2028. In order to align the Company's low-income program, Pennsylvania Customer Assistance Program ("PCAP"), with the 2019 Amended CAP Policy Statement, PCAP will no longer be a fixed credit program. The core changes are as follows:

- Fixed monthly credits and associated recalculations will be eliminated.
- The monthly bill will be based on a percentage of income-payment ("PIP") established by heat type and federal poverty level, with a minimum bill component. Accounts will not be on the equal payment plan ("EPP") or experience true ups.
- New subsidy limits applicable to all FE PA rate districts will be based on the number of credits projected to serve 80% of PCAP participants.
- Recertification periods will be lengthened as defined in the CAP Policy Statement.

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<sup>3</sup> The USAC was a product of the Company's, through its predecessor EDC's, 2016 base rate cases. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa. Pub. Util. Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017). As a result of the PA Consolidation proceeding, FE PA made a number of commitments which impact the administration of its low-income programs. To the extent a settlement term affects a specific provision within the USECP, those revisions are reflected within the plan. All other applicable settlement provisions are outlined in Attachment B. *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience*, Docket Nos. A-2023-3038771, *et al.* (Order entered December 7, 2023); *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Involuntary Remote Disconnect Procedures*; Docket Nos. P-2019-3013979, *et al.* at pp. 13-14 (Order entered July 3, 2023).

- Participants will no longer be graduated or denied enrollment due to low energy burdens. Participants that do not receive monthly credits or forgiveness credits from PCAP may receive other benefits associated with being on the program.

In order to implement these modifications, programming changes are required. Due to this programming effort, it will be necessary to remove PCAP participants from the EPP approximately three months prior to the actual conversion date of the new program logic. This change will impact the monthly amount billed to PCAP participants and new enrollments during this period. As a result, the Company will stop collection activities for active participants from the effective date of the EPP removal until the conversion date. Upon conversion, all unpaid balances will become preprogram arrears which will be subject to arrears forgiveness credits based on 12 months of forgiveness. Existing PCAP customers who have less than 12 months remaining to achieve full forgiveness will not have that timeframe extended due to this change. Existing PCAP customers who have less than 12 months remaining under the 36-month pre-program arrears (PPA) forgiveness timeframe will receive full arrearage forgiveness over those remaining months. This allowance will not extend to existing PCAP customers who have non-PCAP, and in-program arrears added to the PPA balance for forgiveness over 12 months.

Customers will not be eligible for retroactive credits until a removal for failure to reverify or failure to participate in WARM has been processed under the new program. Customers will be notified by mail in advance of changes being made to their account. The communication will include an explanation of the change being made, who to contact with questions, and an overview of the upcoming program changes. A second communication will be mailed when the new program is implemented which announces the program change, defines changes to the bill statement, and explains program benefits.

## **CARES**

### **Overview and Objectives**

The CARES program provides short-term assistance to payment-troubled residential customers. Based upon the circumstances of each customer, the CARES representatives make referrals to social service agencies and provide information on appropriate Company and/or external programs. Many CARES referrals are subsequently enrolled into PCAP.

CARES supports community outreach events, such as the annual Be Utility Wise events sponsored by the Commission, annual hardship fund fundraisers, and senior fairs.

### **Eligibility**

Any customer experiencing a recent hardship such as:

- Serious illness or injury to a member of a household
- Death of a wage earner
- Marital or family problems
- Handicapped or disabled person
- Sudden loss of income to the household
- Any customer 60 years of age or over requiring special assistance

### **Tracking**

When tracking CARES referrals, basic account information is documented for the actions taken in response to the customers' situations.

### **CARES Organizational Structure**

A portion of the following employees' time supports this program:<sup>4</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

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<sup>4</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

## Dollar Energy Fund

### Overview and Objectives

The Dollar Energy Fund ("Fund") is an emergency hardship fund designed to help residential customers who have suffered a recent financial hardship and need temporary help to pay their electric bill. The bulk of program funding is provided by contributions from the Company's stockholders, employees, customers, and the Dollar Energy Fund. The application for funds is processed by the Dollar Energy Fund.

### Dates of Operation

The Fund accepts applications in accordance with pre-established account status guidelines, or if funds remain available. Program dates are as follows:

Period	Account Status
October 1 – November 30	Service Terminated or Pending Termination
December 1 – January 31	Service Terminated
February 1 – February 28	Service Terminated or Pending Termination
March 1 – September 30	Open to All Non-PCAP Customers  PCAP customers with Pending Termination or Service Terminated are also eligible.  As the availability of funds reduces during this period, account status is subject to change until the program is closed based on priority: Service Terminated or Pending Termination, Service Terminated, or Closed.

### Maximum Grant Amount

One maximum grant of \$500 may be awarded to a customer during a program year.

### Contacts and Administering Agencies

The Company's contact person is:

Leonard Howell, FirstEnergy Corp., 5001 Nasa Blvd, Fairmont, WV 26554  
Telephone: 681-753-5518; Email: lhowell@firstenergycorp.com

The Dollar Energy Fund contact person is:

Chad Quinn, Chief Executive Officer, The Dollar Energy Fund, Inc.,  
P. O. Box 42329, Pittsburgh, PA15203-0329  
Telephone: 412-390-3863; Email: cquinn@dollarenergy.org

### Eligibility Guidelines

- The residence must be a residential single home or apartment.

- The name on the account must be an adult resident.
  - Residency exception will be made for ratepayers assigned to active military duty.
- The applicant must provide income information.
  - Total household income (gross) must be at or below 250% of the Federal Poverty Income Guidelines (“FPIG”).
  - Exceptions will be made based on circumstances. Some examples of acceptable hardships are:
    - High out-of-pocket medical expenses;
    - Head of household had to quit work to care for a sick family member;
    - Fire, flood, or other disaster.
- The customer must have paid a minimum of \$150 or the equivalent of three PCAP bill amounts, whichever is less, on their account within the past 90 days. If age 62 and over, the customer must have paid a minimum of \$100 or the equivalent of three PCAP bill amounts, whichever is less.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.
- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Company reserves the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

### **Dollar Energy Fund Organizational Structure**

A portion of the following employees’ time supports this program.<sup>5</sup>

- Manager Revenue Operations Strategy
- Administrative Assistant
- Supervisor – Human Services-Universal Service
- Business Analyst (2) – Various Levels
- Customer Accounting Associate (2) – Various Levels

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<sup>5</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

**Needs Assessments for Hardship Fund:**

The Hardship Fund Needs Assessment is based on income levels at or below 250% FPIG for all active residential accounts in arrears greater than 30 days at year end.

<b>Met- Ed Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	2,887	2,409	3,653	4,030
<b>151 - 200 %</b>	5,039	4,159	6,113	6,756
<b>&lt; 150 %</b>	29,406	23,475	27,580	29,202
<b>Total</b>	<b>37,332</b>	<b>30,043</b>	<b>37,346</b>	<b>39,988</b>

<b>Penelec Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	2,864	2,474	3,545	3,886
<b>151 - 200 %</b>	5,400	4,379	6,079	6,458
<b>&lt; 150 %</b>	35,311	28,569	32,502	33,827
<b>Total</b>	<b>43,575</b>	<b>35,422</b>	<b>42,126</b>	<b>44,171</b>

<b>Penn Power Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	675	594	854	950
<b>151 - 200 %</b>	1,268	1,107	1,496	1,559
<b>&lt; 150 %</b>	7,885	6,788	7,702	7,757
<b>Total</b>	<b>9,828</b>	<b>8,489</b>	<b>10,052</b>	<b>10,266</b>

<b>West Penn Power Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	3,171	2,621	3,840	4,243
<b>151 - 200 %</b>	5,796	4,530	6,470	6,814
<b>&lt; 150 %</b>	33,367	26,406	29,616	31,583
<b>Total</b>	<b>42,334</b>	<b>33,557</b>	<b>39,926</b>	<b>42,640</b>

## Gatekeeper Program

### Overview and Objectives

Gatekeeper is a program where Company field personnel recognize and report customers who may be in "distress" as described below.

### Eligibility Guidelines

Situations include, but are not limited to, the following:

- Communication – A person who appears confused or disoriented;
- Economic Condition – Someone expresses difficulty with paying bills;
- Social Condition – Older persons living alone or socially isolated;
- Physical Limitations – Severe difficulty seeing, speaking, hearing, or moving about;
- Condition of Home – In need of repair, neglected yard, accumulation of newspapers, offensive odors, or unattended pets.

### Gatekeeper Organizational Structure

A portion of the following employees' time supports this program.<sup>6</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

## PCAP

### Overview and Objectives

PCAP helps residential customers maintain electric service and eliminate past-due balances. PCAP offers a reduced bill to customers, based on a PIP and debt forgiveness. The objectives of PCAP are to:

- Improve a customer's payment ability and consistency
- Reduce a customer's consumption of electricity
- Eliminate debt

### Eligibility Requirements

- Total gross household income<sup>7</sup> is at or below 150% of FPIG.
  - The Company adopts the updated FPIG annually within a month after they are published in the *Federal Register*.

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<sup>6</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

<sup>7</sup> 66 Pa. C.S. § 1403: Definition of "**Household income.**" The combined gross income of all adults in a residential household who benefit from the public utility service.

- Proof of household income can be for either the past 30 days or 12 months, whichever is more representative of their actual annual income.
- The Company requires households reporting zero income to complete a zero-income form. The Commission-approved form was modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
  - Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits.
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month. A credit is not provided when the customer exceeds the annual subsidy limit and did not receive an exemption.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

## **Intake Process**

Customers are required to complete an application to apply for PCAP, recertify eligibility, or to re-enroll after being removed from the program.

If a customer final bills as a PCAP participant, the Company charges PCAP participants no more than their prorated PCAP bill (*i.e.*, PIP, minimum bill, or actual tariff charges) for usage incurred during the customer's final billing period. The Company uses the following guidance to determine if a final billed PCAP participant is required to complete an application:

- When an active participant moves out of a location, the PCAP program will follow the customer to the new location provided the original recertification date is a future date. PCAP will follow the customer and resume on the new account.
  - Note: If the customer is moving between Penn Power and one of FE PA's other rate districts (Met-Ed, Penelec, or West Penn), the customer may contact the Customer Care Center can request PCAP be transferred to the new account. A bill print message will be printed on the Penn Power final bill advising customers how to contact the Customer Care Center to request the PCAP transfer.
- If a customer is moving to a new location within 12 months of the last move-out date but the original recertification date is expired, PCAP will follow the customer to the new location and the customer will receive notification to complete recertification or be removed from the program within three months.
- If a customer is moving to a new location more than 12 months after the last move-out date and the original recertification date is expired, PCAP will not transfer to the new account.

Dollar Energy Fund, Inc. is the current PCAP administrator for the Company and processes the PCAP applications for new enrollments or recertifications into PCAP. The administrator can educate and assist the customer with referrals to assistance programs, such as WARM, the Dollar Energy Fund grant program or LIHEAP. Customers may apply for the program by contacting Dollar Energy Fund as follows:

- Call 888-282-6816.
- Complete an online application at [pabillassist.com](http://pabillassist.com).
- Print and mail a paper application from the [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) website. Customers may also request a paper application from the Customer Care Center. The paper application includes the standard zero-income form.

The administrator may also contact participants to initiate a text-to-recertify process. Data rates may apply.

While most applications may be processed by phone or online, the Company reserves the right to request an in-office appointment. Dollar Energy Fund maintains contracts with other community-based organizations (CBOs) where customers can be directed to complete the application process on an as-needed basis.

During the initial call, customers may be asked to provide all household members’ names, dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer.

The documentation may be submitted by fax, mail, email or online, if an online application is submitted.

Fax: 412-515-1661  
 Mail: Dollar Energy Fund, PO Box 42329, Pittsburgh, PA 15203  
 Email: [FirstEnergy@DEFDocs.org](mailto:FirstEnergy@DEFDocs.org)  
 Online: [pabillassist.com](http://pabillassist.com)

The completed records are downloaded to the Company’s host SAP system each business day in a single batch process. Upon successful completion of enrollment, the customer is notified by letter. After the initial billing of a new enrollment, communications will be made to the customer to describe the benefits of the program and the bill.

During this plan period, the Company will be evaluating its intake system and processes for enhancements to provide improvements to the application process and/or submission of income documentation for customers.

**Percentage-of-Income Payment (“PIP”)**

The PIP is based on heat type, income, and federal poverty level.

Federal Poverty Level	Non-electric Heat Type	Electric Heat Type
≤ 50%	2%	6%
51 - 100%	4%	10%
101 – 150%	4%	10%

The monthly asked-to-pay amount is calculated as:

Monthly income \* % by Heat Type and FPIG = Percentage-of-Income Payment (PIP)

To control program costs and institute minimum payment requirements, the PIP will have a minimum established for customers per month.

Heat Type	Minimum Bill
Non-Electric	\$12
Electric	\$45

Examples:

Monthly income = \$1200  
FPIG = 51-100%  
Heat type = non-electric  
PIP percentage = 4%  
 $\$1200 * 4\% = \$48$   
The customer's monthly PIP is \$48.

Monthly income = \$500  
FPIG = < 50%  
Heat type = non-electric  
PIP percentage = 2%  
 $\$500 * 2\% = \$10$   
The calculated PIP is \$10; however, the minimum bill is \$12. The customer's monthly PIP will be \$12.

PCAP participants will be asked to pay either the percentage-of-income payment or the actual charges each month. If the actual charges are less than the percentage-of-income payment, the customer will be asked to pay the actual charges. If the actual charges are more than the percentage-of-income payment, the customer will be asked to pay the PIP amount and a subsidy credit will apply to the difference.

Examples:

Actual charges = \$100  
PIP = \$75

- Customer will receive a \$25 PCAP credit and will be asked to pay \$75.

Actual charges = \$75  
PIP = 100

- Customer will not receive a PCAP credit and will be asked to pay \$75.

The PIP will be prorated for bill periods that are less than 26 days.

## PCAP Credits

An annual subsidy amount is provided to the PCAP participant to reduce the monthly bill charges to the percentage-of-income amount. The subsidy amount will be established at enrollment for use through the December billing.

- Subsidy will credit the customer’s account for the difference between the actual charges and the PCAP percentage-of-income amount. If the customer is billed actual charges in the month, a subsidy credit is not required.
- If the household exhausts the annual subsidy before the December billing, the PCAP bill will be for the actual charges until the January bill is issued. The customer’s account remains on PCAP and remains exempt from late payment fees and security deposit assessment.
- At the January billing, the subsidy amount will be reset to the full annual allotment for use in the new calendar year. If the customer did not exhaust the subsidy limit in the prior year, it will not be carried over to the next year.
- The amount of subsidy is based on the household’s federal poverty level and heat type as follows:

<b>Max Subsidy Credit Limits for PCAP for All Rate Districts FPIG Level</b>	<b>Electric Non-Heating (ENH)</b>	<b>Electric Heating (EH)</b>
<b>0%-50%</b>	\$2,250	\$3,150
<b>51%-100%</b>	\$1,650	\$2,350
<b>101%-150%</b>	\$1,300	\$1,700

FE PA will file and serve an amendment to its 2024 USECP reflecting any increase to the PCAP subsidy credit limits by the same percentage of any distribution rate increase at the USECP dockets by or before the date of implementation of those increased subsidy limits.

FE PA shall perform outreach to PCAP customers when they exceed 50% and 80% of the subsidy credit limits to make them aware of the exceptions and how to notify the Company if they believe they qualify for an exemption. All customers who exceed 80% of their subsidy credit limits will be referred to the WARM program (LIURP) for energy efficiency measures or education unless there is a valid reason for a waiver.

FE PA is obligated to waive the subsidy credit limits for customers who meet the CAP Policy Statement exemptions. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household’s ability to control.
- The household is in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

Based on the changes in this program, quarterly account monitoring becomes unnecessary. The Company’s revised PCAP program will offer one billing method that automatically bills the customer the PIP or the actual charges, whichever is less, making it unnecessary to evaluate the billing method quarterly.

Annually, the Company will identify participants that had annual usage for the calendar year exceeding 125% of the participant’s prior year usage provided the customer resided at the same location during that time. For these participants, the Company will complete outreach quarterly throughout the following year to provide energy conservation messages when customers are not exempt. All participants are

evaluated for the WARM program at enrollment or scheduled recertification. As the Company schedules WARM jobs with contractors, jobs with the highest usage are prioritized first.

When customers exceed 125% of the historical usage, the account will be reviewed to determine if the account can be identified as exempt from the consumption limits. Customers will be mailed a survey to complete and a postage-paid envelope. The survey responses will be reviewed with the USAC annually for the duration of this USECP. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household's ability to control.
- The household is in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

### **Debt Forgiveness Guidelines**

When entering PCAP for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When entering PCAP under the USECP 2024-2028 plan for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When recertifying for PCAP following the first enrollment, additional dollars are not deferred (past due PCAP bills).

For participants removed from PCAP, preprogram debt is due and subject to collection activity. Customers are responsible to pay all charges including preprogram balances.

When re-enrolling into PCAP, all preprogram debt will be deferred and included in the PCAP debt forgiveness component if the initial deferral was \$300 or less. If the initial deferral was more than \$300, only the remaining (not yet forgiven or paid) preprogram debt from the first PCAP enrollment will be re-deferred and included in the PCAP debt forgiveness component. All other past-due, ask-to-pay amounts on the bill will remain due and subject to collection activity after either re-enrollment or re-certification into the program.

While a participant, debt forgiveness credits (1/12 of preprogram debt) will be awarded retroactively in response to full monthly bills being paid, whenever those payments occur, regardless of PCAP arrears. Debt forgiveness credits will be applied in response to any type of payment or credit, including assistance grants, which paid the bill in full. When awarded, credits are applied at monthly billing. PCAP participants must remain in the Company's standard residential billing cycle (twenty-day due date) for debt forgiveness credits to be awarded by the host computer system.

When the full preprogram debt has been forgiven and they no longer have a preprogram arrearage balance, a customer is no longer eligible for debt forgiveness, but the account will remain in PCAP.

### **Default Provisions**

PCAP customers who fail to make timely bill payments will be subject to the collection cycle.<sup>8</sup>

Dunning notices, including termination notices, will be issued for any unpaid current bills. Deferred preprogram debt balances will not be included in dunning notices. PCAP participants who do not make payments in accordance with the program terms will remain in PCAP and be subject to PCAP dunning processes, including service termination. PCAP dunning processes include all the notification and procedural steps required by 52 Pa. Code § Chapter 56.1, *et seq.*, and 66 Pa. C.S. § Chapter 1401, *et seq.* The Company is compliant with the CAP Policy Statement and initiates collection activity for CAP accounts after no more than two payments are in arrears. Participants are not removed or defaulted from PCAP as a precursor to termination for non-payment.

Payment requirements to avoid termination of service:

Past due charges are brought current.

Payment requirements for restoration of service following service termination:

Past due charges are brought current, and  
Reconnection fee per the current tariff is paid.

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<sup>8</sup> *Guidelines for Universal Service and Energy Conservation Programs*, Docket No. M-00960890F0010 (Final Order entered Jul. 10, 1997). Under Customer Assistance Programs, Default Provisions: “The Commission believes that the consequences for nonpayment should be loss of service; therefore, we recommend that participants who do not make payments should be returned to the regular collection cycle.”

## **Dismissal from PCAP and Re-entry into PCAP**

Participants may be removed from PCAP for any of the following reasons:

1. Refusing to participate in WARM if eligible (re-entry is dependent upon participation in the WARM program),
2. Failing to recertify as scheduled, or upon request (re-entry is dependent on completion of re-certification procedures),
3. Theft of service (re-entry prohibited for six months),
4. Other actions deemed to be intentional and fraudulent (re-entry prohibited for six months),
5. Other actions, including but not limited to, failure to permit scheduled meter readings, and pattern of returned check may result in disconnection of service and final billing or removal from the program.

After removal from PCAP, customers may re-apply to PCAP if they resolve the reason for dismissal and meet the eligibility parameters identified above.

Upon re-entry to PCAP after removal for failure to recertify income or failure to participate in WARM, customer accounts may receive missed subsidy and/or forgiveness credits for months billed while not in PCAP if the account was removed within the past 12 months. After 12 months of removal, PCAP applicants are no longer eligible for retroactive subsidy and/or forgiveness credits. Any remaining amount will be paid by the PCAP participant.

- Missed subsidy credits will not be applied for an amount that exceeds the account balance less remaining unpaid preprogram arrearages and/or miscellaneous fees.
- When a customer removed from PCAP moves from one location to the next, the missed credits will only be applied if the customer enrolls for the first account activated following the final account where PCAP was removed.
- Missed forgiveness credits will not be applied for an amount that exceeds the remaining unpaid preprogram arrearages and is only applied for full monthly bills that were paid.

Customers that re-enroll more than 12 months after removal from the program are not eligible for retroactive forgiveness or subsidy credits. For those customers, only the remaining unpaid preprogram debt will be re-deferred at enrollment for future arrears forgiveness unless the initial balance deferred was less than \$300 as described previously in Debt Forgiveness Guidelines.

Customers removed for any reason other than failure to recertify or failure to participate in WARM are not eligible for retroactive credits at any time.

## **Recertification Requirements**

PCAP participants are advised at the time of application that they must recertify eligibility as scheduled or when gross household income, household size, or heat source changes. Customers will be able to recertify over the telephone, online, by mail, or by giving consent on their LIHEAP application to share application data with the utility. A notice to recertify is mailed to PCAP participants 60 days prior to the benefit end date including information on when benefits will expire and how to complete the recertification process. A message is printed on the participant's electric bill at this time. If necessary, a message is printed on the participant's electric bill 30 days prior to the benefit end date and a reminder letter is mailed. Reminder calls will be placed to the customer at 45 and 15 days before the recertification date. If the customer does not successfully complete recertification, the account will be removed from PCAP. Once removed, the customer will receive a letter that explains the account has been removed from PCAP for failure to recertify and provides instructions on how to reapply.

To recertify, PCAP participants will be required to submit the required household income and household member information by U.S. mail, fax, or online, if applying online. Dollar Energy Fund may also contact participants to complete recertification via text message. Data rates may apply.

Completed enrollment or recertification records are transferred to the SAP host system each business day through a batch process, which extends the Benefit End Date based on the income source.

The period for recertification will vary based on income source as follows:

<b>Income Source</b>	<b>Recertification Period</b>
Zero-Income	6 months
SSI, Disability, Pension	3 years
All others	2 years

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

### **Application of Customer Payments and Assistance Grants**

Customer payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

Assistance Grants:

#### LIHEAP

LIHEAP helps eligible customers on low or limited incomes pay their heating bills through energy assistance grants. A customer is not required to have an unpaid bill to receive energy assistance. DHS administers LIHEAP and establishes dates in which LIHEAP is available. Various efforts, such as bill inserts, letters, call campaigns, social media and customer referrals are attempted to encourage customers to pursue LIHEAP funds when available. All eligible customers are encouraged to apply for LIHEAP benefits.

LIHEAP payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation) or in accordance with DHS' directives stated in the annual LIHEAP State Plans

#### Dollar Energy Fund

- First applied against delinquent bills (customer payment obligation), to avoid service termination

- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

### PA HAF

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bills (customer payment obligation)
- Third, applied against deferred arrears (customer payment obligation)
- Fourth, applied against future bills (customer payment obligation)

### ERAP

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bills (customer payment obligation)
- Third, applied against future bills (customer payment obligation)

### **Excess PCAP Credits**

Subsidy credits are not included in refund checks issued to customers. Subsidy credits will be adjusted from the customer's account balance when:

- The subsidy credit exceeds the total account balance, and a final bill has been issued. If the customer established another account, the excess credits may be transferred to the new account instead.
- The subsidy credit exceeds the total account balance, and the credit has been open for 18 months or more.

### **Program Delivery Partners**

The Company will continue the use of CBOs referenced in Attachment A for the daily administration of the USECP. The Company currently contracts with Dollar Energy Fund as the administrator for PCAP applications and recertifications, grant applications, and referrals to WARM and other assistance programs. Dollar Energy Fund is a non-profit agency with an established network of CBOs to process intake for assistance programs and grants.

Subject to the provisions of any implementation orders or other direction issued by the Commission, at such time that the Pennsylvania DHS notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, FE PA will implement required modifications to its Information Technology ("IT") system and processes, within a reasonable time frame not to exceed one year, to automatically recertify an existing PCAP participant's income and eligibility. All related costs to modify IT systems and processes shall be eligible for timely recovery, including any interim costs related to manual processing. All LIHEAP recipients identified in the data exchange will be deemed by FE PA as confirmed low-income customers and will be eligible for winter shutoff protections. FE PA commits to conducting outreach to all LIHEAP recipients identified in the data exchange that are not current PCAP participants to encourage enrollment in the program.

### **Quality Assurance Provisions**

During each calendar year, a representative of the Company, or its designee, shall audit the PCAP administrator to verify proper administrative processes have been performed in support of the PCAP

application and recertification process. The areas of performance to be audited include, but are not limited to:

- Auditor received requested documents
- Case note documented for each customer contact
- Account status document reviewed
- Application completed when applicable
- Recertification completed when applicable
- Referred clients to other program(s) when applicable
- Proper documentation retained
- Hardcopy documentation recorded accurately
- Successfully enrolled clients into PCAP when applicable
- Measure administrator level of service

A combination of applications and recertifications processed by the administrator for the Company shall be reviewed during an audit. A sample size calculator will be used to identify a statistically significant sample size for the applications and recertifications. With the sample size calculator, the standard variables used will be a confidence level of 95% and a confidence interval of 5%.

Human Services prepares the designee, if any, with program information and reviews the audit expectations. The designee reviews each selected application to confirm the administrator followed the appropriate procedure in the application process. The results are tracked on a spreadsheet and reviewed with the Company. The Company and administrator discuss the audit results and coordinate the sharing of information to reinforce training with the administrator's staff and/or identify areas for improvement in workflow processing or technology.

### **Assessment of Security Deposits**

Security deposits are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

Upon PCAP enrollment or when customers are determined to be income eligible for PCAP through receipt of a LIHEAP grant, a held deposit (if any) is refunded directly to the customer.

### **Assessment of Late Payment Charges**

Late payment charges are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

### **Customer Choice**

Per the Commission Order dated August 4, 2022, for the Joint Petition for Partial Settlement of the Default Service Plan<sup>9</sup>, customers enrolled in PCAP may not receive service from an electric generation supplier effective June 1, 2023.

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<sup>9</sup> *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Its Default Service Plan for the Period from June 1, 2023 through May 31, 2027*, Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, P-2021-3030021 (Order entered August 4, 2022).



## **Consumer Education, Outreach and Referral (“CEOP”)**

The CEOP is an evolving process and will be modified and enhanced as needed throughout the duration of the 2024 USECP.

As a PCAP participant, customers receive the following communications:

- Enrollment letter;
- Recertification letter;
- Reminder recertification letter with form, if needed;
- Confirmation letter of recertification;
- Removal letter, if needed;
- Subsidy-remaining letters when the customer has exhausted 50% and 80% of the annual limit;
- Quarterly mailings with energy conservation information when participants’ usage increased 25% compared to the prior year of service at the same location; and
- Outbound calls are also completed as part of the recertification process.

As a PCAP applicant, customers receive the following outreach:

- Email notifications from the pabillassist.com online application when income documents are required;
- Email notifications 10 days after the pabillassist.com online application is started. If documentation has not been received, a third email notification is sent if not received 20 days after the online application was submitted;
- Outbound calls from the Company to remind the customer the application is pending required documentation; and
- Mailed copy of the PCAP agreement when application is submitted.

Outreach to promote energy assistance program enrollment to customers 0-50% FPIG and higher is completed as follows:

- Outbound call campaigns in the 1<sup>st</sup> and 4<sup>th</sup> quarter to promote LIHEAP CASH and CRISIS;
- Participate in the CRISIS Utility File Transfer (UFT) program;
- Participate in the Turn On program, when open;
- Outbound call campaigns to promote PCAP enrollment;
- Email campaigns to promote PCAP enrollment;
- Bill inserts to promote all assistance programs;
- Letters are mailed to LIHEAP recipients that are not on PCAP when household and income information was shared by the Department of Human Services from the LIHEAP application;
- News release to promote all assistance programs twice per year;
- Monthly social media messages to promote an active program or assistance in general;
- Radio commercials to promote LIHEAP or PCAP;
- Corporate website provides information for assistance programs along with an interactive tool to help determine income eligibility;
- On hold message to direct customers to our website for assistance information;
- Provide education and promote enrollment to customers or agencies via Be Utility Wise, senior fairs, expos, etc.;
- Distribute printed materials to community agencies;
- Door hangers for field collections;
- Referral information included on letters related to credit denial, security deposits, termination, etc.;

- Referral information provided to customers during inbound contacts.

The Company makes the following available to Spanish-speaking customers:

- PCAP agreement;
- Program letters include Spanish verbiage;
- PCAP brochures for distribution, live events, or online reference;
- PA LIHEAP bill insert includes Spanish verbiage;
- Dollar Energy Fund is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers; and
- The Company has interpreting services available for inbound inquiries.

With the implementation of a revised PCAP program, the Company will establish opportunities for community agencies to attend universal service training. A schedule of these events and venue (virtual, in-person or both) will be determined based on the known circumstances, such as weather, health, and safety considerations.

### **PA Customer Assistance Program Organizational Structure**

A portion of the following employees' time supports this program.<sup>10</sup>

- Manager Revenue Operations Strategy
- Administrative Assistant
- Supervisor – Human Services – Universal Service
- Business Analyst (7) – Various Levels
- Customer Accounting Associate (2) – Various Levels

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<sup>10</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

## **WARM Program**

### **Program Overview and Objectives**

The WARM program is the name of the Company's Low Income Usage Reduction Program. The program provides energy education and energy conservation measures and services to low-income customers.

The program targets low-income customers who participate in PCAP or LIHEAP. The program's primary objectives are to:

1. Reduce the overall energy use, energy bills, and arrearages of low-income customers.
2. Improve participants' health, safety, and comfort in their homes.
3. Make personalized referrals to the Company's USECP and other assistance programs.

WARM achieves these objectives through two approaches. First, energy conservation improvements are installed, and inefficient appliances are replaced in the customer's home. Second, an energy conservation auditor provides energy education to family members and refers them to other potentially beneficial social service programs. All work performed through the WARM program is provided at no cost to program participants.

### **Eligibility Guidelines**

#### Income Eligibility:

Residential customers are eligible for WARM if their household income is at or below 150% of the FPIG. The Company also provides WARM services to customers with special needs whose household income is between 151% and 200% of FPIG. Commission regulations allow up to 20% of the WARM budget to be used for these customers. The definition has always included customers with overdue account balances, and the Company also includes those households with medical problems, personal crisis situations, and loss of income. This allows more customers under 200% of FPIG to participate in the program without requiring or encouraging an account arrearage.

#### Residency Eligibility:

The customer must reside at the service address and have at least 6 months of consecutive service. Both homeowners and renters qualify for the program; however, renters must obtain landlord approval for permanent measures to be installed in the customer's home that reduce seasonal kWh use, such as air sealing and insulation. If landlord approval is not received, only baseload measures will be installed (e.g., smart power strips, LED lightbulbs, and customer owned refrigerator or freezer replacements. If a landlord agreement is received by the company, providing consent to participate, a copy of the signed agreement form will be provided to both the landlord and the tenant.

The customer must agree to share his or her electric use information with the Company's agencies/contractors. In addition, the customer must allow contractors to have access to the home to perform appropriate program measures and quality assurance inspections.

Homes previously served by the program may receive WARM services again after 5 years if the home continues to meet the program eligibility guidelines. The Company will consider waiving the 5-year stay-out

requirement if full measures were not completed the last time the home was served, such as air-sealing and insulation. Exceptions may also be made if barriers that prevented the installation of full weatherization measures have been resolved.

#### Electric Use Eligibility and PCAP Participation Provision:

Customers who meet program income guidelines and have annual electric usage of 6,000 kWh or more qualify for the WARM program, if their home has not been weatherized in the last 5 years. No minimum usage will be required for customers who are having their WARM services coordinated with another program, such as the PA Weatherization Assistance Program (“WAP”) or a Natural Gas Distribution Company (“NGDC”), allowing most services to be provided at the same time. In these cases, and when a fossil fuel heating system is present, most full-service weatherization measures must be paid for by other program partners, and their costs must be documented in the program management system.

If a customer participates in PCAP and they are eligible for the WARM program, (i.e., meeting electric usage requirements and the home has not been served within the last 5 years) they are required to participate in the program to continue to receive PCAP benefits. This includes receiving an in-home energy evaluation, developing an energy-savings plan with the energy auditor and permitting the installation of energy saving measures that will help reduce the home’s electric usage. The Company may make exceptions for customers refusing to participate if the circumstances are beyond the customers’ control. This requirement will be waived only if the Company determines there is a valid reason the measures cannot be installed (i.e., such as medical reasons). Failure to respond to WARM scheduling contacts or refusal to allow the installation of measures are not valid reasons to waive this requirement without justification.

Contractors will make at least two phone calls and send two letters to a customer waiting one week in between each attempt before canceling a WARM job after which the company will pursue removal of the customer from PCAP. Missed PCAP credits will be reinstated retroactively if the customer chooses to participate in the WARM program and receives the appropriate services.

#### Applying for the WARM Program

Program eligibility is determined when a customer contacts Dollar Energy to apply for PCAP by calling or applying online. In addition, the customer may submit a paper application via mail, fax, or email.

Dollar Energy accepts verbal consent for participation in the WARM program if the customer agrees to voice recording. The customer service agent will document the customer’s consent in their system, and written confirmation will be provided to the customer that includes the terms and conditions agreed upon during the call.

#### **Marketing**

To reach this customer segment, the application intake process for the PCAP and WARM programs has been streamlined to determine a customer’s eligibility for both programs at the same time. This process has proven to be a cost-effective comprehensive approach to helping low-income customers who could benefit from these programs.

All letters and applications are available in Spanish, and the WARM program uses a translation service for customers who speak a language other than English.

Geographic marketing tactics include a combination of mass communication vehicles and one-on-one communications, such as newspaper, cable TV, search engine marketing, bill inserts, and direct mail campaigns. Community presentations are also used to inform customers about the program.

A bill insert providing details on available customer assistance programs, including the WARM program, is sent annually to all residential customers. Program information and eligibility requirements are also shared with customers during fall and winter collection activities and distributed in customer winter surveys.

Cross-marketing with Act 129 programs is optimized. Customers may obtain program information by: 1) accessing the Company's *energysavepa.com* website; 2) reviewing program materials provided to them when they participate in the Act 129 appliance recycling program and/or appliance rebate program; and 3) receiving program advertisements included in customized Home Energy Reports.

The Company plans to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, social media, and piloting creative incentives to help identify and provide services to customers in need. The Company also plans to update materials used in outreach efforts.

### **Heating and Cooling Budget Calculation Per Home**

The selection of measures designed to reduce electric heating and cooling is guided by a cost-effective budget calculation (seasonal allowance) for each home, based on past electric consumption with consideration also given to the regulatory seven-to twelve-year payback requirement. This calculation tool for contractors and agencies is not an absolute or prescriptive target for WARM. During the audit, if the site or customer needs are greater than the calculated budget, the contractor or agency will confer with the Company program manager after documenting reasons for proposing to go beyond the budget. The Company will decide to what extent additional work may be performed. This procedure allows higher budgets on higher-energy-use homes and prevents substantial use of funds on low-use homes where the potential for energy savings is less.

Increases in this seasonal allowance calculation are periodically implemented to keep pace with agency/contractor price increases.

The Commission granted the Company a temporary partial waiver of the LIURP regulation at Section 58.11(a) that restricts each installed measure to a payback period of seven or twelve years. The waiver shall apply only to heating jobs for which the audit indicates the home should receive comprehensive measures. The overall job must still be cost-effective and otherwise meet LIURP regulations. The waiver will extend for the duration of this USECP.

Baseload electric measures and appliance replacements are based upon on-site auditing and monitoring of energy use of the existing appliances. The replacement thresholds and procedures are updated periodically to reflect changes in costs and/or efficiencies.

## Energy Saving Measures

The specific measures installed, and actions taken are dependent on the customer's heat type, electric use, testing of appliances and diagnostic audit results. Customers and landlords have the right to refuse recommended measures. Contractors and agencies are required to install measures according to the program priority list found in the WARM Policy and Procedures Manual. Contractors are encouraged to consider cost effective custom measures and strive to meet relevant payback periods. Agencies and contractors provide one-year warranties on most measures and manufacturers may provide additional warranties. The following list identifies measures that customers may receive through the WARM program:

- Air conditioning/heating system filter replacement
- Appliance and water heater timers
- Attic, duct, basement, crawlspace, and perimeter air sealing (caulking, foam insulation & weather-stripping)
- Attic, wall, duct, floor, crawlspace, and perimeter insulation
- Blower door with pressure diagnostics to guide air sealing and duct sealing
- Boxing and damming of attic heat producing fixtures
- Central AC, Heat Pump, Mini Split Clean & Tune or Replacement
- Clothesline installation
- CO detectors
- Custom measures, (i.e., well pump or holding tank replacements, etc.)
- Dehumidifier Replacement
- Ductless heat pumps
- Electric Baseboard Repair/Replace
- Electric dryer venting installation, repair, or replacement
- Energy education
- Exterior/Storm Door Repair/Replace
- Faucet Aerators and Showerheads (Water Reduction Measure)
- Freezer/Refrigerator replacement
- Furnace whistle
- Furnace, Heat Pump, Mini Split Clean & Tune
- Heat Pump and Mini Split Installation/Replacement
- Heat Pump Clean & Tune
- Heat pump water heaters
- Heated waterbed mattress replacement
- Installing new exhaust fans
- Interior Door Repair/Replace
- LED lighting
- Plumbing Repairs (Hot Water Leaks and Faucet Replacement)
- Reflective roof coat to reduce cooling use
- Reflective window tint to reduce cooling use
- Remedial education as needed
- Repair and replacement of exhaust fans
- Sealing and insulating attic hatches
- Site specific health and safety measures, such as carbon monoxide detectors
- Smart power strips
- Smoke alarms
- Some aerator and showerhead replacement
- Some heating and air conditioning system replacement
- Some plumbing and electrical repairs
- Some storm and prime window and door repair or replacement

Thermostat replacement/repair  
Water heater pipe insulation  
Water heater replacement  
Window Reglaze/Replace Glass  
Window/Wall AC Gaskets  
Window/wall air conditioning unit replacement  
Repair or Replace Electric Hot Water Heaters

## **Energy Education**

The Company and agencies/contractors use a proven partnership approach with the customer. The customer is asked to partner with the program agency/contractor to develop energy savings strategies designed specifically to address the highest energy use areas of the home and its occupants. Auditors help customers understand what is driving their electricity usage by putting costs on choices and behaviors. Then the auditor and customer sign partnership and savings strategy agreements.

Approximately six months after the completion of WARM services, the Company sends customers congratulatory letters when usage has decreased more than 5% when compared to the same months before WARM services. A list of customers whose usage has increased more than 10% is provided to agencies/contractors for a follow-up phone call and visit to the customer if necessary. The agency/contractor will check if measures are working properly and whether the customer understands how to use them or if lifestyle or structural changes created the increased electric use.

Another education resource for WARM program participants is the Act 129 program Home Energy Reports that includes customized energy education messaging. These reports are sent to a subset of customers identified as low-income customers, including WARM participants.

The Company will continue to evaluate educational materials and tools for customers and auditors and make updates as needed.

## **Company's Organizational Structure**

A portion of the following employees' time supports the program.<sup>11</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services – Energy Conservation  
Business Analyst (9) – Various Levels  
Customer Accounting Associate (1)

## **Program Delivery**

The Company contracts with a network of CBOs and energy conservation contractors, referenced in Attachment A of this plan, to deliver program services. CBOs and energy conservation contractors may be eligible for incentives if they meet performance goals.

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<sup>11</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

Program auditors or crew members who make decisions about what measures will be installed in the home and who perform the combustion safety testing procedures, must be Building Performance Institute (BPI) certified as Building Analyst Professionals. BPI is a national standards development and credentialing organization for residential energy efficiency retrofit work. It is a non-profit organization that also provides training through a network of training affiliate organizations. The Company sponsors agency and contractor attendance at national and regional ACI Home Performance Conferences to allow agencies/contractors to obtain continuing education credits needed to retain their BPI certification.

The Company also holds WARM program training specific to USECP procedural issues or to meet the training needs of auditors and crew members. The Company recognizes that CBOs and energy conservation contractors have seen an increase in staff turnover since the pandemic began. During the plan years, the Company will continue to focus on training, utilizing webinars, in-person group sessions when practical, and one-on-one training when needed. Topics of emphasis will include:

- Auditing training for new auditors utilizing newly developed and timely materials
- Overcoming barriers to the installation of energy conservation measures
- Policy and procedure updates

The Company and its contractors benefitted from the roll out of the Low- Income Energy Conservation and Energy Efficiency Network (“LEEN”) program management and tracking system in 2019.

The LEEN system:

- Facilitates workload management using work queues
  - Allows tracking of deferred homes with health and safety issues
  - Helps to manage jobs in various stages
- Promotes effective communication and documentation through an enhanced user messaging system
- Provides dashboards to give graphical representations of progress towards goals
- Has robust reporting capabilities
- Features the automatic retrieval of customer information system data at the time of job creation, etc.

Future enhancements proposed for LEEN include:

- Invoice payment and SAP cost accounting system integration
- Incorporating the WARM energy audit into LEEN

## **Quality Assurance Provisions**

The Company plans to maintain the same level of third-party quality assurance inspections, inspecting 35% of total production. The quality assurance contractors will continue to focus most of their inspections on homes that have electric heat and supplemental electric heating or air conditioning. Greater oversight is needed in these homes because of the installation of comprehensive measures and combustion safety testing. The quality assurance contractor also delivers, or coordinates auditor, crew, and group training as needed and provides mentoring to new energy auditors.

The Company continues to use a WARM technical advisory Panel that meets two to three times per year and is on-call year-round. The panel members consist of agency and contractor auditors, and program managers from across Pennsylvania along with principal WARM quality assurance inspectors. The members have direct contact with customers and other assistance programs in other states. They

provide suggestions for program improvement, research innovative technologies, and test new measures and products.

Company program managers meet with all agencies and contractors annually to share program changes and solicit feedback. Company program managers work closely with individual agencies and contractors, often observing audits and crew work in the field.

The Company also strives to defer to the Department of Energy National Standard Work Specifications-based quality control inspection protocols on jobs coordinated with WAP where possible and practical.

## **Coordination of Services**

As recommended by the Commission, the Company will continue to direct agencies and contractors to coordinate delivery of WARM benefits with other programs. The Company works with WAP and NGDCs to coordinate delivery. Although coordination may allow for the efficient use of funding sources and resources, coordination may impact the program's overall electric energy savings. This is because the customers identified by NGDCs or WAP might not be the highest electric users targeted for participation in the WARM program. The Company waives the annual usage requirement on all coordinated jobs. When a surplus of low-income customers exists, the Company continues to prioritize customers by highest energy use first. Most WARM jobs are coordinated with an Act 129 program. WARM accepts applications from customers with incomes between 151% and 200% of the FPIG who live in buildings served by Act 129 multi-family projects.

The Company continues to find that many WARM participants are using supplemental electric heat in the winter even though the primary source of heat in the home is something other than electricity. Since this is a frequent occurrence, the Company strives to reduce the customer's supplemental electric heat use by coordinating services with the WAP and NGDC LIURP programs to repair gas or oil heating systems where possible.

To increase the accuracy of reporting coordinated jobs with other programs, functionality was added to the LEEN system that requires contractors to document coordinated job information.

The Company will continue to provide energy usage data to the Department of Community and Economic Development to assist in its WAP energy saving studies.

## **Health and Safety**

Health and safety measures are installed to allow WARM contractors to proceed with the installation of energy-saving measures at a customer's home. The purpose of health and safety measures is to ensure that WARM's energy-saving measures may be installed and operate safely. Examples of such measures include:

- Roof repairs
- Knob and tube wiring remediation
- Damming of heat producing light fixtures; and
- Flue repairs

Certain health and safety measures may help protect a home's occupants, but typically do not lead to reduced electricity usage. Such measures include, but are not limited to:

- Smoke alarms and carbon monoxide detectors; and
- Pressure relief valves and overflow pipes on water heaters.

Where customers have a fossil fuel heating system, the Companies perform combustion safety testing to ensure safe use of combustion appliances/systems whenever measures are installed that impact the building envelop (e.g., air sealing). WARM contractors adhere to the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 62.2 ventilation standards.

The Companies allow up to 50% of the seasonal allowance to be spent on health and safety measures. This is in addition to the seasonal allowance funds to install energy reduction measures. Contractors are encouraged to reach out to their Company program manager when additional health and safety funds are needed to fully address barriers to the installation of energy reduction measures.

### **Disqualified or Deferred Homes**

Contractors are encouraged to contact their WARM program manager when additional funds are needed to fully address barriers to energy reduction measures installation. Contractors are also encouraged to coordinate jobs with other weatherization programs when applicable.

Sometimes a weatherization contractor encounters a condition in the home identified as a health and safety issue or a barrier prohibiting the installation of energy saving measures that is outside the scope of the WARM program. In such cases, the customer will be provided with an H&S Conditions and Findings Form, outlining the issue and what must be resolved for the job to continue.

If the issue is resolved the contractors will return to install the additional energy saving measures. Contractors are encouraged to coordinate with other programs and/or refer homes with major safety issues to programs that address such issues. The Company will track deferred homes indefinitely for re-evaluation if additional programs or funding become available.

### **Reporting**

The following reports are submitted to the Commission or Department of Human Services on an annual basis:

- LIURP production, expenditures, cost of jobs and goals report March 1
- Universal Service Program (LIURP Section) April 1
- Conservation economics and energy planning bureau report April 30
- LIURP annual energy savings impact evaluation April 30

## LIURP Needs Assessments

The Company currently projects there are approximately 81,222 potential LIURP participants in the Met-Ed Rate District with incomes at or below 150% of FPIG. The comparable totals for Penelec, Penn Power and West Penn Rate Districts are 106,971, 23,798 and 117,135, respectively. Details of the Company's Rate Districts needs assessments are shown below, including estimates of potential LIURP participants with incomes 151-200% of FPIG.

FirstEnergy 2024-2028 USECP WARM Needs Assessment - April 2024				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Number of Customers with Incomes at or Below 150% of FPIG</b>	109,057	145,169	34,395	147,770
Usage at or Above 6,000 kWh per Year	92,698	123,394	29,236	125,605
Received WARM in the Last Five Years	4,893	8,248	2,857	4,663
Less than Six Months of Usage History	1,592	2,044	436	1,235
Renters Projected where LL Refused	1,309	1,276	418	647
Projected to Drop Out	3,008	3,881	1,350	1,251
Number of Customers Receiving Services - Act 129	673	973	377	674
<b>Total Potential Participants</b>	<b>81,222</b>	<b>106,971</b>	<b>23,798</b>	<b>117,135</b>
Weighted Average Job Cost for 2023	\$ 4,699.49	\$ 3,535.99	\$ 4,602.47	\$ 6,456.30
Estimated Cost to Serve Potential Participants	\$ 383,226,816.58	\$ 378,247,435.43	\$ 109,529,254.65	\$ 756,256,517.42
Estimated Renters	24,463	60,735	12,614	57,126
<b>Number of Customers with Incomes 151-200% of FPIG</b>	<b>48,355</b>	<b>57,086</b>	<b>14,856</b>	<b>53,779</b>
Usage at or Above 6,000 kWh per Year	41,102	48,523	12,628	45,712
Received WARM in the Last Five Years	1,083	1,030	382	703
Less than Six Months of Usage History	706	804	188	449
Renters Projected where LL Refused	988	1,003	169	199
Projected to Drop Out	683	485	181	189
<b>Total Potential Participants</b>	<b>37,642</b>	<b>45,201</b>	<b>11,707</b>	<b>44,172</b>
Weighted Average Job Cost for 2023	\$ 4,699.49	\$ 3,535.99	\$ 4,602.47	\$ 6,456.30
Estimated Cost to Serve Potential Participants	\$ 176,895,713.14	\$ 159,833,553.05	\$ 53,882,914.97	\$ 285,189,022.19
Estimated Renters	11,735	19,052	5,105	17,582

## Funding and Enrollment Goals<sup>12</sup>

Met-Ed		
Year	Budget	Participant Goals
2024	\$ 10,408,580	1,505
2025	\$ 11,010,038	1,505
2026	\$ 11,647,123	1,505
2027	\$ 12,321,963	1,505
2028	\$ 13,036,810	1,505

Penelec		
Year	Budget	Participant Goals
2024	\$7,890,000	1,735
2025	\$8,345,680	1,735
2026	\$8,828,346	1,735
2027	\$9,339,611	1,735
2028	\$9,881,183	1,735

Penn Power		
Year	Budget	Participant Goals
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

West Penn Power		
Year	Budget	Participant Goals
2024	\$ 11,151,400	1,300
2025	\$ 11,803,428	1,300
2026	\$ 12,494,237	1,300
2027	\$ 13,226,146	1,300
2028	\$ 14,001,614	1,300

<sup>12</sup> The WARM budgets are based on projected WARM enrollment levels for the 2024 through 2028 program years. However, where a budget is overestimated in the USECP for one program year, the Company will roll over this excess budget amount from one program year to the next consistent with the Company's last base rate settlement. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016- 2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R- 2016-2537359 (Opinion and Order entered Jan. 19, 2017).

In general, the average cost of serving WARM participants' homes has increased over the years due to measure price increases, particularly since the beginning of the COVID-19 pandemic. Also, seasonal load reduction measures continue to be installed in homes using electric space heaters in lieu of fossil fuel heaters. Homes that previously were classified as water heat or baseload jobs that received lighting, refrigerator replacements and water heat reduction measures require attic air sealing, insulation, and combustion safety tests in many cases. Due to the increased complexity of the measures, it also takes additional time to serve these homes, which prevents agencies and contractors from serving the same number of homes under prior plans. The Company continues to stress with contractors that they need to overcome barriers to the installation of measures wherever possible.

Participant goals are also consistent with the Company's experience in a post-COVID-19 world where contractors continue to struggle to maintain adequate staffing levels. Additionally, the Company is struggling to find enough customers willing to participate in WARM in certain areas of their service territory, particularly Penn Power. Holding participant goals at the levels proposed will allow spending per home to gradually increase over the plan's term. The Company proposes that any unspent funds from the current plan period be carried over into the new plan period as reserve funds.

## Summary of Proposed Program Additions and Modifications

### PCAP

All changes approved by the Commission for the 2024-2028 plan will be effective after the relevant IT changes are made. The previously approved plan will remain effective until such IT changes are adopted. The following program modifications are included in this plan for PCAP as compared to the Company's current USECP approved on July 11, 2019:

1. PCAP will be converted from a fixed credit program to a percentage-of-income payment program, which does not involve the equal payment plan or a minimum energy burden. The participant will be billed a percentage-of-income payment or the actual charges, whichever is less. Percentage-of-income payments are based on federal poverty level, heat type, and income as defined in the 2019 Amended CAP Policy Statement.
2. The Company will continue utilizing the Commission-approved zero-income form modified for completion telephonically.
3. The Company is introducing a customer education and outreach plan.
4. The Company affirmatively acknowledges that it accepts income documentation of 30 days or 12 months, whichever is more beneficial and representative of their true annual income
5. The Company proposes that income documentation will not be required during application or recertification when the customer is known to be a LIHEAP recipient within the last 12 months from the date of the application. Income information will be obtained verbally to complete the application.
6. New subsidy limits applicable to all FE PA service territories will be based on the number of credits projected to serve 80% of PCAP participants. Participants will be notified when 50% or 80% of the subsidy limit has been exhausted. Participants will be advised how to request an exception to the subsidy limit if they are eligible.
7. Recertification periods will be modified to align with the CAP Policy Statement based on income source.
8. Automatic recertification will occur for PCAP participants that authorize DHS to share the household and income data from the LIHEAP application with the Company.
9. LIHEAP recipients enrolled on PCAP will not have the recertification date extended one year when a LIHEAP grant has posted.
10. Outreach to encourage enrollment will be sent to customers that are not on PCAP but authorized DHS to share the household and income data from the LIHEAP application with the Company.
11. Income documents will not be required to apply for PCAP if the LIHEAP recipient authorized DHS to share the household and income data from the LIHEAP application with the Company.
12. The suspension period will be eliminated as part of the recertification process.
13. The debt forgiveness period will be changed from 36 months to 12 months.
14. Remove dismissal due to a minimum energy burden requirement (aka graduated).
15. The requirement to participate in the EPP has been eliminated.
16. Retroactive credits will be provided to participants removed from PCAP due to failure to participate in the WARM.
17. PCAP will be transferred to a new account when the customer moves from one rate district to another. Penn Power customers must request the transfer. PCAP will transfer automatically for Met-Ed, Penelec and West Penn if eligible.

## **WARM**

The following program modifications are included in this plan for WARM:

1. If customers participate in PCAP, they will be required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Failure to do so may result in the customer being removed from PCAP. Customers who are removed from PCAP that later decide to participate in WARM within 12 months will have the PCAP subsidy and/or forgiveness credits applied retroactively.
2. The Company plans to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, and social media to help identify and provide services to customers in need. The Company also plans to update materials used in outreach efforts.
3. The minimum annual usage requirement for WARM participation will be reduced from 6,500 kWh to 6,000 kWh.

## **Applied Technologies in Support of Universal Service Programs**

The Company employs various technologies to promote an efficient delivery of their USECP. Some of the more significant technologies are described below:

### **C-Net On-line Help System**

C-Net On-Line Help System is a Microsoft Office application called SharePoint. C-Net provides the Company's Customer Care Centers and the Human Services department employees with detailed on-line information on federal and state programs and the Company's USECP.

### **SAP**

SAP is the Company's host computer system containing the customer master file.

### **Human Services Web Site**

The Human Services web site allows CBOs to easily obtain current customer billing, payment, energy use and other information while evaluating customers' energy assistance applications without Customer Contact Center or Human Services involvement. Entry to the site is password protected.

### **LEEN System**

The LEEN system is a web-based system used to assist inspectors, contractors, and the Company's administrators in their management of the WARM program. This system replaced the WARM system. Some features include:

- Streamlined security role structure
- SAP integration for application entry and job status
- Enhanced job assignment process
- Enhanced job status reports for quality assurance staff and program managers
- Invoice management process
- Work queues functionality

- Required fields to support the documentation and reporting of coordinated jobs

### **Application Intake System**

The Company developed a new web-based application system for PCAP and WARM applications in 2023. This system replaced the Chronicles application. The system provides an administrator with the ability to take applications by phone or mail, as well as providing customers with a tool for self-service. The application will provide document storage, historical records, and limited SAP integration. The system provides automated updates to customers as the application moves through the workflow process. The Company eliminated requesting social security numbers as part of the application process. Customers will be asked to provide their account number instead.

## Universal Service Eligibility Criteria

### PCAP

- Total gross household income is at or below 150% of FPIG. Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial and representative of their true annual income.
  - The Company requires households reporting zero income to complete a zero-income form. The Commission-approved form was modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
- Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits:
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits, unless the amount originally set aside is \$300 or less.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.

### WARM

- Total gross household income is at or below 150% FPIG; up to twenty percent of the budget is used for customers with special needs at 151%-200% FPIG.
- The customer must reside at a service address and have six months of consecutive electric service.
- The customer must provide proof of home ownership.
- A minimum annual use of 6,000 kWh is required; 0 kWh for homes coordinated with state or gas weatherization.
- Homes may receive services again after five years if the annual electric usage meets or exceeds 6,000 kWh.

### Hardship Fund

- Total gross household income must be at or below 250% FPIG.
- The account is for a residential single home or apartment.
- The name on the account must be an adult resident; a residency exception will be made for ratepayers assigned to active military duty.
- The customer must have paid a minimum of \$150 or the equivalent of three PCAP bill amounts, whichever is less, on their account within the past 90 days. If age 62 and over, the customer must have paid a minimum of \$100 or the equivalent of three PCAP bill amounts, whichever is less.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.

- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Company reserves the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

## **CARES**

To qualify, the customer must be payment-troubled and experiencing a recent hardship, such as serious illness or injury to a member of a household, death of a wage earner, marital or family problems, handicapped or disabled person, sudden loss of income to the household, or any customer 60 years of age or over requiring special assistance.

## Universal Service Needs Assessments for Each of FE PA's Rate Districts

2023 Needs Assessment - Met-Ed						
Based on:						
Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau						
December 2023 Customer Count						
County	Total Households	Households Under 150% Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	40,006	7,343	18.35%	31,016	5,691	
Berks	161,174	39,091	24.25%	130,527	31,653	
Bucks	246,834	30,920	12.53%	5,222	654	
Chester	200,622	26,695	13.31%	1,153	153	
Cumberland	104,053	17,997	17.30%	11,034	1,909	
Dauphin	117,907	28,086	23.82%	5,942	1,415	
Lancaster	208,988	40,800	19.52%	1,996	390	
Lebanon	55,236	12,875	23.31%	54,078	12,606	
Lehigh	142,160	35,093	24.69%	3,790	936	
Monroe	59,113	13,494	22.83%	21,967	5,015	
Montgomery	329,680	45,315	13.75%	11,990	1,649	
Northampton	120,384	24,233	20.13%	60,993	12,278	
Pike	23,780	4,743	19.95%	15,882	3,168	
York	178,543	34,365	19.25%	163,844	31,540	
<b>Total</b>	<b>1,988,480</b>	<b>361,050</b>	<b>18.16%</b>	<b>519,434</b>	<b>109,057</b>	<b>20.995%</b>

**2023 Needs Assessment - Penelec**

Based on:

Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau

**December 2023 Customer Count**

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Armstrong	27,767	6,764	24.36%	98	24	
Bedford	19,571	5,341	27.29%	10,001	2,729	
Blair	50,587	13,918	27.51%	48,477	13,336	
Bradford	24,361	6,824	28.01%	19,525	5,469	
Cambria	55,541	16,318	29.38%	54,400	15,983	
Centre	58,285	17,691	30.35%	4,438	1,347	
Clarion	14,808	4,578	30.92%	4,914	1,519	
Clearfield	31,741	8,864	27.93%	29,689	8,292	
Crawford	33,191	10,328	31.12%	22,134	6,888	
Cumberland	104,053	17,997	17.30%	5,297	916	
Erie	109,474	33,375	30.49%	106,706	32,535	
Forest	1,844	700	37.96%	3,455	1,312	
Franklin	62,576	13,976	22.33%	5,124	1,144	
Huntington	15,771	4,091	25.94%	11,479	2,978	
Indiana	32,285	9,728	30.13%	22,541	6,792	
Jefferson	18,018	5,549	30.80%	14,090	4,340	
Juniata	8,852	2,269	25.63%	720	185	
Lycoming	45,705	12,186	26.66%	723	193	
McKean	15,931	4,977	31.24%	13,977	4,366	
Mifflin	18,612	6,718	36.09%	19,447	7,018	
Perry	18,066	3,601	19.93%	981	196	
Potter	6,595	2,069	31.37%	2,486	780	
Somerset	28,956	7,610	26.28%	26,541	6,975	
Sullivan	2,462	615	24.98%	2,894	723	
Susquehanna	15,641	4,013	25.66%	11,766	3,019	
Tioga	16,583	4,523	27.27%	13,944	3,803	
Venango	21,323	6,362	29.84%	18,397	5,490	
Warren	16,209	4,440	27.39%	14,729	4,034	
Wayne	19,747	4,928	24.96%	3,116	778	
Westmoreland	153,237	31,629	20.64%	1,975	408	
Wyoming	10,788	2,442	22.64%	7,053	1,597	
<b>Total</b>	<b>1,058,580</b>	<b>274,424</b>	<b>25.92%</b>	<b>501,117</b>	<b>145,169</b>	<b>28.969%</b>

**2023 Needs Assessment - Penn Power**

Based on:

Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau

December 2023 Customer Count

<b>County</b>	<b>Total Households</b>	<b>Households Under 150% of Poverty</b>	<b>Percent of Households Under 150% of Poverty</b>	<b>Res. Cust.</b>	<b>Estimated Residential Customers &lt;150% of Poverty</b>	<b>Estimated Res. Cust. &lt;150% of Poverty % to Total</b>
<b>Allegheny</b>	545,637	121,529	22.27%	20,696	4,609	
<b>Beaver</b>	71,999	15,859	22.03%	11,753	2,589	
<b>Butler</b>	79,466	14,430	18.16%	32,128	5,834	
<b>Crawford</b>	33,191	10,328	31.12%	6,350	1,976	
<b>Lawrence</b>	35,933	10,399	28.94%	33,472	9,687	
<b>Mercer</b>	45,890	12,250	26.69%	45,513	12,147	
<b>Venango</b>	21,323	6,362	29.84%	21	6	
<b>Total</b>	<b>833,439</b>	<b>191,157</b>	<b>22.94%</b>	<b>149,933</b>	<b>34,395</b>	<b>22.940%</b>

**2023 Needs Assessment - West Penn Power**

Based on:

Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau

December 2023 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	40,006	7,343	18.35%	1,615	296	
Allegheny	545,637	121,529	22.27%	71,960	16,025	
Armstrong	27,767	6,764	24.36%	29,414	7,165	
Bedford	19,571	5,341	27.29%	4,099	1,119	
Blair	50,587	13,918	27.51%	17	5	
Butler	79,466	14,430	18.16%	44,845	8,144	
Cameron	2,210	810	36.65%	3,444	1,262	
Centre	58,285	17,691	30.35%	55,780	16,929	
Clarion	14,808	4,578	30.92%	8,793	2,719	
Clinton	14,877	4,339	29.17%	2,614	763	
Elk	13,485	3,234	23.98%	16,157	3,874	
Fayette	54,937	16,601	30.22%	60,352	18,238	
Franklin	62,576	13,976	22.33%	49,360	11,022	
Fulton	6,126	1,437	23.46%	5,245	1,230	
Greene	13,957	3,411	24.44%	15,837	3,871	
Huntingdon	15,771	4,091	25.94%	1	0	
Indiana	32,285	9,728	30.13%	1,335	402	
Jefferson	18,018	5,549	30.80%	43	13	
Lycoming	45,705	12,186	26.66%	492	131	
McKean	15,931	4,977	31.24%	4,343	1,357	
Potter	6,595	2,069	31.37%	2,538	796	
Somerset	28,956	7,610	26.28%	240	63	
Washington	87,200	17,671	20.26%	94,968	19,241	
Westmoreland	153,237	31,629	20.64%	160,392	33,105	
<b>Total</b>	<b>1,407,993</b>	<b>330,912</b>	<b>23.50%</b>	<b>633,884</b>	<b>147,770</b>	<b>23.312%</b>

## Universal Service Participant and Budget Projections for Each of FE PA's Rate Districts

<b>Met Ed Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	16,232	18,160	18,803	19,467	20,156
Administration	3,281,139	1,769,273	1,831,163	1,895,183	1,961,557
Bill Subsidy	20,712,450	23,172,628	23,993,113	24,840,394	25,719,576
Debt Forgiveness	8,557,729	5,579,964	4,597,302	4,273,023	4,166,011
Total PCAP	32,551,318	30,521,866	30,421,577	31,008,600	31,847,144
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,505	1,505	1,505	1,505	1,505
Total WARM	10,408,580	11,010,038	11,647,123	12,321,963	13,321,963
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	5500	5,500	5,500	5,500	5,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Met-Ed</b>	<b>43,042,398</b>	<b>41,614,404</b>	<b>42,151,200</b>	<b>43,413,063</b>	<b>45,251,607</b>

<b>Penelec Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	21,991	24,604	25,201	25,812	26,438
Administration	3,746,838	2,499,730	2,608,726	2,647,511	2,686,863
Bill Subsidy	23,223,752	25,983,229	26,613,695	27,258,946	27,920,038
Debt Forgiveness	8,330,361	5,590,444	4,686,272	4,387,895	4,289,431
Total PCAP	35,300,950	34,073,403	33,908,693	34,294,352	34,896,332
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,735	1,735	1,735	1,735	1,735
Total WARM	7,890,000	8,345,680	8,828,346	9,339,611	9,881,183
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Penelec</b>	<b>43,271,450</b>	<b>42,499,633</b>	<b>42,817,589</b>	<b>43,714,513</b>	<b>44,858,065</b>

<b>Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	5,022	5,618	5,768	5,922	6,081
Administration	907,440	698,031	730,489	741,137	751,888
Bill Subsidy	5,454,119	6,101,402	6,264,309	6,431,560	6,604,241
Debt Forgiveness	1,658,154	1,127,018	951,744	893,903	874,816
Total PCAP	8,019,712	7,926,451	7,946,541	8,066,600	8,230,945
<b>WARM (LIURP)</b>					
Projected WARM Participants	600	600	600	600	600
Total WARM	3,466,000	3,535,760	3,606,635	3,678,768	3,752,343
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
<b>Gatekeeper</b>					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
<b>Total Penn Power</b>	<b>11,522,712</b>	<b>11,499,211</b>	<b>11,590,176</b>	<b>11,782,368</b>	<b>12,020,288</b>

<b>West Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	18,526	20,727	21,357	22,007	22,676
Administration	3,525,060	2,314,767	2,337,782	2,360,903	2,384,341
Bill Subsidy	20,294,461	22,705,564	23,395,703	24,107,751	24,840,613
Debt Forgiveness	8,413,564	6,010,239	5,217,141	4,955,419	4,869,051
Total PCAP	32,233,085	31,030,570	30,950,627	31,424,074	32,094,004
<b>WARM (LIURP)</b>					
Projected WARM Participants	1300	1300	1300	1300	1300
Total WARM	11,151,400	11,803,428	12,494,237	13,226,146	14,001,614
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total West Penn Power</b>	<b>43,436,485</b>	<b>42,885,998</b>	<b>43,496,864</b>	<b>44,702,220</b>	<b>46,147,618</b>

The PCAP budgets are based on projected PCAP enrollment levels for 2024 through 2028 program years and the estimated average expense per year-end participant. The Company attempts to consider plan changes and past trends during similar events when estimating expenses or participation. The budgets may be adjusted each year based on actual data to minimize over and under-collections from customers.

## Conclusion

The Company submits its Universal Service and Energy Conservation Program is consistent with all applicable Commission requirements, including the following:

- 52 Pa. Code § 56.1, *et seq.* (Standards and Billing Practices for Residential Utility Service)
- 66 Pa. C.S. § 1401, *et seq.* (Responsible Utility Customer Protection Act)
- 52 Pa. Code §§ 54.71-54.78 (Reporting Requirements for Universal Service and Energy Conservation Programs)
- 52 Pa. Code §§ 58.1-58.18 (regarding LIURP)
- PCAP Policy Statement of July 25, 1992, Docket No. M-00920345
- 66 Pa. C.S. §§ 2801, *et seq.* (Electricity Generation Customer Choice and Competition Act)
- Commission Universal Service and Energy Conservation Programs Guidelines, Docket No. M-00960890F0010 (Order entered Jul. 10, 1997)
- Commission Universal Service and Energy Conservation Program Reporting Requirements, Docket No. L-00970130 (Order entered Apr. 30, 1998)
- Customer Assistance Programs: Funding Levels and Cost Recovery Mechanisms, Docket No. M-00051923 (Order entered Dec. 18, 2006)
- Cost recovery of USECP costs via the Company's Universal Service Cost Riders as approved by the Commission's Orders at Docket Nos. R-00061366, R-00061367, R-00072437, and R-2014-2428742
- *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017)
- *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience*, Docket Nos. A-2023-3038771, *et al.* (Order entered December 7, 2023)
- *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Involuntary Remote Disconnect Procedures*; Docket Nos. P-2019-3013979, *et al.* (Order entered July 3, 2023)

- *2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs*; Docket No. M-2023-3038944 (Order entered June 13, 2024).

## **Company Contacts**

Inquiries regarding this report should be directed to:

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Human Services Department  
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Leonard Howell, Supervisor – Universal Service Programs  
Human Services Department  
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Fairmont, West Virginia 26554  
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Email: howell@firstenergycorp.com

Walt Larnerd, Manager Revenue Operations Strategy  
5001 Nasa Blvd  
Fairmont, West Virginia 26554  
Telephone: 681-753-5583  
Email: wlarnerd@firstenergycorp.com

## **Attachment A - Community-Based Organizations (CBO)**

- ACTION-Housing Inc. 1-800-841-6899
- CLEARResult 1-800-367-7223
- Community Action Committee of the Lehigh Valley 1-866-847-4565
- Community Action Partnership of Mercer County 1-888-508-5216
- Center for Community Action 1-800-323-9997
- Central PA Community Action, Inc. 1-814-765-1551
- C. Driscoll Positive Energy Consulting 1-724-984-4147
- Dollar Energy Fund 1-888-282-6816
- Erie County Housing Authority 1-800-841-6899
- Harron's Home Center 1-877-274-6276
- Healthy Homes 1-724-662-3591
- Hranec Insulation Corporation 1-724-363-0092
- Mincin Insulation 1-412-461-0160
- MT Weatherization 717-525-9665
- Northern Tier Community Action Corporation 1-814-486-1161
- Northwest PA Weatherization 1-814-425-1872
- SEDA-Council of Governments 1-570-524-4491
- Solaire Energy, Inc. 1-800-518-8911
- South Central Community Action Programs 1-800-451-8969
- Tableland Services, Inc. 1-814-445-9628
- TEAZ, Inc. 1-724-366-6753
- True Management, LLC 1-484-866-8011
- Warren Forest Counties Economic Opportunity Council 1-800-231-1797
- Weatherization, Inc. 1-877-984-7462
- York Home Performance 717-586-8584

## Attachment B – PA Consolidation Settlement Relevant Terms

On December 7, 2023, the Commission approved the PA Consolidation settlement agreement which contained a number of provisions that affect the administration of FE PA's USECP. *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company* ("Joint Petition"), Docket Nos. A-2023-3038771, et al. (Order entered December 7, 2023). Provisions applicable to FE PA's low-income programs are listed below. To the extent a settlement term directly impacts language within the USECP, those changes are also reflected within the plan in addition to being listed below.

The applicable provisions include:

- Maintaining current staffing levels for FE PA's universal service programs for the duration of its Proposed 2024 USECP, excluding retirements and voluntary separations. Joint Petition at p. 11, ¶40.
- Hosting its USAC on a quarterly basis through each calendar year and presenting any proposed changes or amendments to program design or administration before advancing to a formal proposal, implementing changes, and discussing issues and questions that occur in its service territories related to consolidation or its universal service programs. Joint Petition at pp. 11-12, ¶41.
- Sharing program data with USAC members in advance of each USAC meeting to help facilitate informed discussions; including program participant data, spending levels, and other relevant program metrics as settled on by the parties for each USECP. Joint Petition at p. 12, ¶42.
- Providing a platform for open dialogue and feedback regarding programming at USAC meetings. Cost allocation to other ratepayer classes will not be discussed. Joint Petition at p. 12, ¶43.
- Increasing the diversity and range of community voices in the USAC through recruitment of additional members such as local housing providers, food assistance providers, weatherization and home repair providers, community health clinics, domestic violence agencies, immigrant and refugee resettlement organizations, and other local community-based organizations serving low-income individuals and communities within FE PA's service territory. Joint Petition at p. 12, ¶44.
- Providing an update on FE PA's seamless transition of PCAP enrollment between rate districts to its USAC as a standing agenda item until full implementation is complete. Joint Petition at p. 13, ¶45.
- Making contributions of \$150,000 annually to FE PA's Hardship Fund, incremental to the current matching contribution, for a period of three years after Commission approval of the transaction; and contributions of \$100,000 annually to the Hardship Fund, incremental to the current matching contribution, for the following two years. Any unspent funding from the annual contributions will be rolled over to be used for Hardship funding for the subsequent program year. Joint Petition at p. 13, ¶46.
- Implementing required modifications to its information technology system and processes, within a reasonable time frame not to exceed one year, to automatically recertify an existing PCAP participant's income and eligibility. Use best efforts to implement manual processing to recertify LIHEAP recipients for PCAP purposes until the required system changes have been made. Identify and deem all LIHEAP recipients from the data exchange as confirmed low-income customers eligible for winter shutoff protections. Commit to conducting outreach to all LIHEAP recipients identified in the data exchange that are not current PCAP participants to encourage program enrollment. Joint Petition at pp. 13-14, ¶47.

## Attachment C - Reporting Requirements

The following reporting requirements were outlined in the 2024 USECP:

For the duration of this USECP, FE PA will implement the following steps if its actual annual PCAP costs exceed the annual projected costs, as identified in its 2024 USECP, by more than 20%:

- Notify the Commission and all parties to the 2024 USECP proceeding and its USAC by or before April 1 and provide actual annual PCAP cost information for the preceding year.
- Schedule a meeting (virtual or in-person) with all interested stakeholders within 30 days of this notification to discuss the costs and receive input on cost controls.
- File and serve a petition at the 2024 USECP docket proposing additional cost control measures or a letter justifying why no additional cost control measures are needed within 30 days of the stakeholder meeting.

FE PA will track the amount of LIHEAP dollars issued to CAP customers that are returned to DHS each year and the reasons why these funds are returned. FE PA will track this information, share and discuss this information annually with its USAC, and report annual unused LIHEAP dollars refunded for CAP accounts from 2024 through 2030 as part of its proposed 2031-2035 USECP.

FE PA is to file and serve a report at these dockets by April 1 each year where actual PPA forgiveness costs for a 12-month PPA forgiveness in the previous calendar year exceeded the estimates provided in Attachment B of its Supplemental Information by 20% or higher. This report should provide an explanation for the increase in PPA costs and updated projections for the remainder of the USECP years based on 12, 24, and 36 months of PPA forgiveness.

Evaluate the reasons customers fail to recertify for PCAP and its impact on customer payments, disconnections, and arrearages.

Track and report for each rate district how many PCAP customers exceed these subsidy credit limits and whether certain subsets of customers (*i.e.*, based on income or account type) are particularly impacted. This reporting must also include by rate district:

- How many of these customers received termination notices and how many thereafter had service terminated.
- How many of these customers were granted exceptions to the subsidy credit limits and the basis for exemption.
- How many of these customers participated in WARM.
- How many of these customers did not participate in WARM and the reasons why not, if known.

Accordingly, based on the new subsidy credit limits, FE PA shall file and serve an annual report on April 1 of each year at its USECP dockets beginning in 2026 for the duration of its 2024 USECP on the number of PCAP customers reaching or exceeding their subsidy credit limits, broken down by account type (*i.e.*, ENH and EH) and FPIG income tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%).

Also, beginning in 2025 and for the duration of its 2024 USECP, FE PA shall file and serve, by March 1 at these dockets, annual updates to its CEOP which include outreach and education actions taken.

FE PA's existing 2019 USECP will continue in operation in whole or in part until replacement provisions of the Revised 2024 USECP are implemented. A third-party independent evaluation of FE PA's universal service programs is due on November 1, 2028.

FE PA's 2024 USECP shall be in effect until its next USECP is approved and implemented. FE PA's next proposed USECP shall be due on or before November 1, 2029, and shall include enrollment and budget projections for five years starting January 1, 2031 (*i.e.*, 2031-2035).

FE PA shall revise the WARM landlord agreement form to include language consistent with the provisions of 52 Pa. Code § 58.8(a) and clarify that tenants are eligible to receive baseload measures without landlord consent. The company shall file and serve a copy of the revised landlord agreement form at these dockets within three months from the entry date of this Order.

FE PA shall file and serve a copy of the amended WARM Program Application at these dockets within six months of the entry date of this Order.

FE PA shall file and serve an updated WARM needs assessment on March 2, 2026, at these dockets, consistent with this Order.

FE PA shall file and serve an amendment to its 2024-2028 Universal Service and Energy Conservation Plan reflecting updated universal service budget amounts and the estimated cost recovered from each non-PCAP customer monthly when all four rate districts are merged.

## Attachment D - Revised Outreach Materials

Please note that the letters for enrollment and notice to recertify are subject to modification as the Company advances through the implementation of the PCAP revisions. The letters are the same for all rate districts.

### PCAP Recertification Letter – 60-days notice

Account Number:  
Service Address:

Dear

It is time for you to recertify with Met-Ed's Pennsylvania Customer Assistance Program (PCAP). The recertification is required by 11/30/2019 to continue receiving your benefits. If you are removed from the program, your full account balance will become due. If your recertification is already in progress, please continue with your application. If not, please re-apply online at [pabillassist.com](http://pabillassist.com), or contact Dollar Energy Fund at 888-282-6816.

During the enrollment period, you received the following PCAP benefits:

- Monthly credits in total of \$2,670.00 which lowered your monthly payment responsibility
- Forgiveness credit in total of \$0.00 which lowered your balance set aside at the time of enrollment

Also, if confirmed income eligible for PCAP, you will continue to not be charged a security deposit or late payment fees.

To recertify, you may be asked to provide all household members' names, dates of birth and proof of income for adults. Proof of income can be for either the past 30 days or 12 months, whichever is more beneficial and representative of your true annual income.

For potential WARM benefits, such as an in-home energy usage evaluation or energy-saving home improvements at no cost to you, please have your landlord's name and phone number available if renting.

Also, when you complete a LIHEAP application, you may choose to allow the Department of Human Services to share your application information with the utility that will receive the LIHEAP grant. If your grant is directed to your electric account, your account can be recertified automatically for PCAP. Contact your County Assistance Office or call the DHS Helpline for more information at 800-692-7462 (800-451-5886 TDD for individuals with hearing impairments).

Sincerely,

Met-Ed, A FirstEnergy Company

Por favor comuníquese con Dollar Energy Fund al 888-282-6816 para recertificar su hogar y calificación de ingresos para el Programa de Asistencia al Cliente de Pennsylvania (PCAP). Si usted es removido(a) del programa, el saldo total de su cuenta de electricidad será adeudado y los beneficios PCAP que reducen el monto de su cuenta finalizarán. Dollar Energy de esta disponible de lunes a viernes de 8 a.m. a 5 p.m.

## PCAP Recertification Letter – 30-days notice (3-page letter)

Account Number:

Service Address:

Dear |

It is time for you to recertify with Met-Ed's Pennsylvania Customer Assistance Program (PCAP). The recertification is required by 06/01/2021 to continue receiving your benefits. If you are removed from the program, your full account balance will become due. **If your recertification is already in progress, please continue with your application.** If not, you may recertify online at [pabillassist.com](http://pabillassist.com), call Dollar Energy Fund, or complete and return the enclosed recertification form. Dollar Energy Fund may attempt to contact you by text message as a convenient way for you to complete some or all of the recertification process. Message and data rates may apply. You may choose to opt out of the text message process by replying "STOP".

During the enrollment period, you received the following PCAP benefits:

- Monthly credits in total of \$544.98 which lowered your monthly payment responsibility
- Forgiveness credits in total of \$0.00 which lowered your balance set aside at the time of enrollment.

Also, if confirmed income eligible for PCAP, you will continue to not be charged a security deposit or late payment fees.

To recertify, you may be asked to provide all household members' names, dates of birth and proof of income for adults. Proof of income can be for either the past 30 days or 12 months, whichever is more beneficial and representative of your true annual income.

For potential WARM benefits, such as an in-home energy usage evaluation or energy-saving home improvements at no cost to you, please have your landlord's name and phone number available if renting.

Also, when you complete a LIHEAP application, you may choose to allow the Department of Human Services to share your application information with the utility that will receive the LIHEAP grant. If your grant is directed to your electric account, your account can be recertified automatically for PCAP. Contact your County Assistance Office or call the DHS Helpline for more information at 800-692-7462 (800-451-5886 TDD for individuals with hearing impairments).

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**Pennsylvania Customer Assistance Program (PCAP) Recertification Form**

**Apply online at [pabillassist.com](http://pabillassist.com)** If you haven't registered for an online account with FirstEnergy, you will be directed to complete registration. Please note if you have already applied, you do not need to complete a new application.

**1. Applicant Information:**

Is your electric service terminated?		Yes	No	Do you have a termination notice?		Yes	No
Electric Account Number:		Name on Electric Account:			Name of Applicant:		
Home Phone Number:		Cell Phone Number:		Email:			
Service Address:					Who is head of household?		

Circle all that apply:

To help us identify additional assistance programs which may be available to you, please circle all that you have applied for since October 1:							
LIHEAP	CRISIS	Dollar Energy Fund	Other	None			
Type of housing:	Single Home	Row	Semi	Townhouse	Mobile Home	Apartment	Other
Ownership Status:	Own	Rent	Other				
If renting, the landlord's permission is required before home improvements can be made through the WARM program. Please list your landlord's name, address and/or phone number:							
Do you have electric hot water heating?		Yes	No	Do you pay for heating?		Yes	No
How is your residence mainly heated?				If heating with gas, who is your provider?			
Electric	Gas	Oil	Propane	Wood	Other		

**2. Household Information:**

Complete this section for each person living in your home including ratepayer or yourself. Attach additional sheets if needed.

Name	Birthdate	Relationship to Applicant	Income for last 30 days*	Type of Income (See next page for list)

\*Income documents may be submitted for the last 30 days or 12 months, whichever is more beneficial and representative of your true annual income. Income is neither counted nor requested for household members under 18 years of age.

**Other Income:** This section is required if Other income type is listed in Household Information.

How often do you receive?	Annual	Bimonthly	Every Other Week	Monthly	Weekly
Is this a temporary source of income?	Yes	No			
How long do you expect this income source to exist?	30 Days	60 Days	90 Days	Greater than 90 Days	

**Zero Income:** This section is required if total amount of household income is zero (\$0) in Household Information.

I confirm/state that no adult member of my household is currently receiving income from any source.

Identify how you and your household meet monthly living expenses, such as expenses for housing (mortgage or rent), food, electric (electric, gas, water, and/or phone). Check all that apply, at least 1 option must be selected:

Using money from savings       Financial support from friends/family/community       Other

**Acceptable Types of Income Documentation**

Types of Income	Acceptable Proof
Black Lung Benefits	Statement from Coal Mine Workers' Compensation of expected benefit
Employment - Salary or Wages	Pay stubs to cover last 30-day period, letter from employer
Military Pay	Copy of Military pay receipt or copy of direct deposit statement
Other	Income not listed on the Types of Income form. Please complete the Other Income questions on section #2 on the application.
Pension	Copy of pension check with attached stub indicating gross income, Letter from Pension Board, 1099 tax form, or bank statement
Public Assistance - Department of Public Welfare (TANF)	Benefits Letter from current year or Printout of benefits received from Department of Human Services
Rental Income	Tenant Lease(s), Notarized Statement - Must include the amount the tenant is required to pay each month for rent, or rent receipts
Retirement Savings	401k, 403b, IRA, and Annuities - copy of 1099 tax form required Roth IRA - copy of form 5498 from bank
Royalties	Monthly royalty statement, Copy of royalty check (last 30 days), Bank statement (last 30 days), Other income form (last resort)
Self-Employment	Current Tax Return Documentation - Form 1040 & associated Schedule (C, K, SE, S, etc.), Quarterly statement from accountant, or 1099 tax form
Short Term or Long Term Disability	Letter of determination, Copy of disability check, or bank statement
Social Security - Retirement, Disability, Supplemental Security Income (SSI), (Adults)	Copy of letter from Social Security Administration, benefit statement from current year, 1099 tax form, or bank statement - To obtain a copy of a benefit letter, visit <a href="http://ssa.gov/myaccount">ssa.gov/myaccount</a> or call 1-800-772-1213.
Spousal support	Court order (only if receiving amount ordered), Domestic relations printout (last 30 days), <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days), <a href="http://www.GoProgram.com">www.GoProgram.com</a> bank statement (last 30 days), Passthrough Welfare Benefits statement from welfare (both sides), Voluntary child support of spousal support - Use other income form
Unemployment Compensation	Statement from Unemployment Compensation of expected benefit from current year, unemployment printout, or bank statement
Utility Allowance/Check	Copy of utility check, If reimbursed on a card, printout from the card (last 30 days), Document from housing that lists the utility reimbursement
Veterans' Benefits	Copy of letter from Veterans Administration, benefit statement from current year, or bank statement - Visit <a href="http://va.gov/records/download-va-letters">va.gov/records/download-va-letters</a> or call 1-800-827-1000.
Workers' Compensation	Statement from Workers' Compensation of expected benefit, letter of determination, copy of check, or bank statement
Zero Income	No income. Please complete the Zero Income section under #2 on the application.

**3. Acknowledgement and Consent**

I agree that the facts set forth in my PCAP application are true and complete to the best of my knowledge. FirstEnergy reserves the right to further verify application information if necessary. I understand and accept that false or incomplete statements will be cause for rejecting my application or removing me from the program.

I allow FirstEnergy and the Dollar Energy Fund to release and exchange relevant information with other agencies or utilities in order to make appropriate referrals to services that may assist me in lowering my energy bill or help me to better afford my energy costs.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Check the following before mailing:**

- Review Sections 1-3 to ensure your application is signed and completed.
- Include acceptable income documentation for all adults listed in Household Information. Write your account number on each document submitted.
- Mail or fax your completed application and acceptable income documentation to:  
 Dollar Energy Fund  
 P.O. Box 42329  
 Pittsburgh, PA 15203  
 Fax: 412-515-1661

For questions about your PCAP application, contact Dollar Energy Fund at 888-282-6816 Monday through Friday from 8 a.m. to 5 p.m.

## Enrollment Letter (two-page letter)

Account Number:

Dear West Penn Power Customer,

Welcome to West Penn Power's Pennsylvania Customer Assistance Program (PCAP)! Based on your application, your PCAP credit is \$58.40 and will be subtracted from your monthly bill amount. The amount of the credit can change each month based on your usage.

If eligible, your account balance has been set aside for forgiveness credits. If this is not your first time enrolling in PCAP and your initial program balance was more than \$300, you will only be eligible for forgiveness credits for the portion of the balance that was originally set aside and has not been paid. The remainder of your balance will be due on your first PCAP bill. A message will show on your bill if you are eligible for the forgiveness credit.

With program enrollment, a security deposit is not required for your electric account. If you have already paid a security deposit, it will be refunded to you. Additionally, you will not be required to pay late payment fees while enrolled in the program.

Recertification of income and household information is a requirement to remain on PCAP. If your account is removed from PCAP, the remaining amount of what was set aside will become due immediately.

You will be notified by phone and/or mail when it is time to recertify. You may recertify using [pabillassist.com](http://pabillassist.com) or calling Dollar Energy Fund. Dollar Energy Fund may attempt to contact you by text message as a convenient way for you to complete some or all of the recertification process. Message and data rates may apply. You may choose to opt out of the text message process by replying "STOP". If you receive a LIHEAP grant for your electric account, you may choose on your application to allow the Department of Human Services (DHS) to share your household and income information with us so your account can be recertified for PCAP automatically without a new application.

**Important Notice:** The Pennsylvania Public Utility Commission approved changes to the Pennsylvania Customer Assistance Program (PCAP) to address energy affordability in the Commonwealth. Penelec will implement a revised PCAP program in December 2024. To prepare for the upcoming changes:

- Your account will not be eligible for the Equal Payment Plan while in PCAP. This means your monthly bill amounts will vary.
- During this brief period your account will be protected from disconnection.
- With the new PCAP program, your unpaid energy charges, if any, will be set aside and eligible for forgiveness credits.

We appreciate your patience as we make these transitions for the program. If you have questions about PCAP, please call us at 800-686-0021.

Sincerely,  
West Penn Power, A FirstEnergy Company

Account Number:

Dear

On August 4, 2022, the Pennsylvania Public Utility Commission ordered that effective June 1, 2023, customers enrolled in the West Penn Power Pennsylvania Customer Assistance Program (PCAP) may not receive service from an electric generation supplier and must return to West Penn Power's default service.

Our default service rate is called the Price to Compare (PTC) and is shown on your monthly bill. West Penn Power purchases this power through a competitive bid auction and the PTC rate is then approved by the Commission. The PTC rate changes every 6 months.

If you were receiving service from an electric generation supplier upon PCAP enrollment, your account has been returned to default service. You will be charged at the price-to-compare (PTC) rate effective at that time. The supplier cannot charge fees or penalties for this early termination or cancellation.

If you have questions, please contact us at 800-686-0021, Monday through Friday 8 a.m. to 6 p.m.

Sincerely,

West Penn Power, A FirstEnergy Company

PCAP Paper Application (4 pages)

**Acceptable Types of Income Documentation**

Types of Income	Acceptable Proof
Black Lung Benefits	Statement from Coal Mine Workers' Compensation of expected benefit
Employment - Salary or Wages	Pay stubs to cover last 30-day period, letter from employer
Military Pay	Copy of military pay receipt or copy of direct deposit statement
Pension	Copy of pension check with stub indicating gross income, a letter from pension board, 1099 tax form or bank statement
Public Assistance - Department of Public Welfare (TANF)	Letter of benefits from current year or printout of benefits received from Department of Human Services
Rental Income	Tenant lease(s), notarized statement, including the amount the tenant is required to pay each month for rent or rent receipts
Retirement Savings	401K, 403b, IRA, and Annuities - copy of 1099 tax form required Roth IRA- copy of form 5498 from bank
Royalties	Monthly royalty statement, copy of royalty check (last 30 days), bank statement (last 30 days) or other income form
Self-Employment	Current tax return documentation, including Form 1040 & associated schedule (C, K, SE, S, etc.), quarterly statement from accountant or 1099 tax form
Short Term or Long-Term Disability	Letter of determination, copy of disability check, or bank statement
Social Security - Retirement, Disability, Supplemental Security Income (SSI), (Adults)	Copy of letter from Social Security Administration, benefit statement from current year, 1099 tax form or bank statement To obtain a copy of a benefit letter, visit <a href="http://ssa.gov/myaccount">ssa.gov/myaccount</a> or call 1-800-772-1213
Spousal Support	Court order (only if receiving amount ordered) Domestic relations printout (last 30 days) - <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days) <a href="http://www.GoProgram.com">www.GoProgram.com</a> bank statement (last 30 days) Passthrough Welfare Benefits statement from welfare (both sides) Voluntary child support of spousal support - Use other income form
Unemployment Compensation	Statement from Unemployment Compensation of expected benefit from current year, unemployment printout or bank statement
Utility Allowance/Check	Copy of utility check, document from housing listing utility reimbursement; printout from card if reimbursed on card (within the last 30 days)
Veterans' Benefits	Copy of letter from Veterans Administration, benefit statement from current year, or bank statement Visit <a href="http://va.gov/records/download-va-letters">va.gov/records/download-va-letters</a> or call 1-800-827-1000
Workers' Compensation	Statement from Workers' Compensation of expected benefit, letter of determination, copy of check or bank statement
Zero Income	No income. Please complete the 'Zero Income' questions in section 2 of this application.
Other	Income not listed on this form. Please complete the 'Other Income' questions in section 2 of this application.

## Pennsylvania Customer Assistance Program (PCAP) Enrollment Form

**Apply online at [pabillassist.com](http://pabillassist.com).** If you haven't registered for an online account with FirstEnergy, you will be directed to create one. If you have already applied, you do not need to complete a new application.

**If your service has been disconnected or you have received a termination notice, please contact your utility. A pending PCAP application does not prevent service termination.**

**Account Number:**

**Name on Account:**

**Service Address:**

### 1. Applicant Information:

Is your electric service terminated?	Yes	No	Do you have a termination notice?	Yes	No
Name of applicant:					
Home phone number:			Cell phone number:		Email:
To help us identify additional assistance programs which may be available to you, please circle all that you have applied for since October 1: LIHEAP    CRISIS    Dollar Energy Fund    Other    None					
Type of housing:    Single Home    Row    Semi    Townhouse    Mobile Home    Apartment    Other					
Ownership status:    Own    Rent    Other					
If renting, the landlord's permission is required before home improvements can be made through the WARM program. Please list your landlord's name, address and/or phone number:					
Do you have electric hot water heating?					
Yes		No			
Do you pay for heating?					
Yes		No			
How is your residence mainly heated?					
Electric		Gas		Oil    Propane    Wood    Other	
If heating with gas, who is your provider?					

**2. Household Information:** Complete this section for each person living in your home, including the electric account holder or yourself. Attach additional sheets if needed.

Name	Birthdate	Relationship to Applicant	Income for the last 30 days*	Type of Income (See included list) If any member does not have income, enter zero.

\*Income documents may be submitted for the last 30 days or 12 months, whichever is more beneficial and representative of your true annual income. Income is neither counted nor requested for household members under 18.

**Account Number:**

**Name on Account:**

**Other Income:** Complete this section if you included income in the Household Information section qualified as 'Other' by the Types of Income list.

How often do you receive this income?	Annual	Bimonthly	Every Other Week	Monthly	Weekly
Is this a temporary source of income?	Yes	No			
How long do you expect this income source to exist?	30 days	60 days	90 days	Greater than 90 days	

**Zero Income:** Complete this section if the total amount of income is zero (\$0) in the Household Information section of this application.

I confirm/state that no adult member of my household is currently receiving income from any source.

Indicate how you and your household meet monthly living expenses, including housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone). You must select at least one option. Check all that apply.

- I am using money from savings
- I receive financial support from friends/family/community
- Other

**3. Acknowledgement and Consent**

I agree that the facts set forth in my PCAP application are true and complete to the best of my knowledge. FirstEnergy reserves the right to further verify application information if necessary. I understand and accept that false or incomplete statements will be cause for rejecting my application or removing me from the program.

I allow FirstEnergy and the Dollar Energy Fund to release and exchange relevant information with other agencies or utilities in order to make appropriate referrals to services that may assist me in lowering my energy bill or help me to better afford my energy costs.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**PCAP Participants:**

- Must acknowledge this account is for the primary residence of the account holder.
- Must agree to re-enrollment if you were a previous PCAP participant. You will be contacted by Dollar Energy Fund to advise you of the amount due on your first PCAP bill if re-enrolled. If your initial program balance was more than \$300, you will only be eligible for forgiveness credits for the portion of the balance that was originally set aside and has not been paid. The remainder of your balance will be due immediately. You must decide whether to re-enroll after being notified of the estimated amount due on your next PCAP bill.
- Agree to recertify household income eligibility as scheduled or when there is a change in household size, income, or heat source. Notifications to complete recertification begin approximately 60 days before the scheduled end date of the program. You may apply online at [pabillassist.com](http://pabillassist.com), call Dollar Energy Fund or complete the paper application that will be mailed. LIHEAP applicants may choose to share their LIHEAP application data with us on the LIHEAP application to help with program enrollment or recertification. FirstEnergy will automatically recertify PCAP customers that share this LIHEAP application data with us.
- Agree to apply for the Low Income Home Energy Assistance Program (LIHEAP), if eligible.
- Agree to participate in the WARM program, if eligible.
- Cannot be on an installment plan while enrolled in PCAP. Being removed from an installment plan may cause a larger balance to be due on the first PCAP bill.
- Cannot participate in Equal Payment Plan billing.
- Cannot receive service from an electric generation supplier. Suppliers cannot charge a PCAP participant any additional fees. This includes early termination and cancellation fees.
- Must pay PCAP bills in full to receive program benefits and avoid service termination.
- Cannot be billed on a PCAP account for products and services, such as the Meter Surge Arrestor program, Line Protection Program, AC, Furnace, and Electrical program, Tree Trimming and Landscape Lighting program.
- May be billed on a separate account for outdoor lighting.

**Check the following before mailing:**

- **Review sections 1-3 to ensure your application is signed and completed.**
- **Include acceptable income documentation for all adults under the Household Information section of this application. Please write your account number on each document.**
- **Mail or fax your completed application and acceptable income documentation to:  
Dollar Energy Fund P.O Box 42329 Pittsburgh, PA 15203 or fax to 412-515-1661**

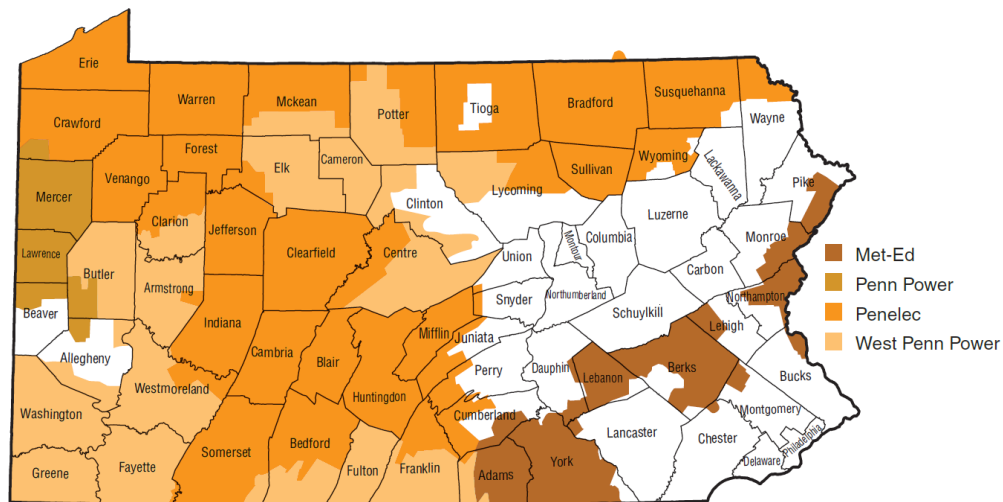
**For questions about your PCAP application, contact Dollar Energy Fund at 888-282-6816 Monday through Friday from 8 a.m. to 5 p.m.**



**Further Amended Joint Universal Service & Energy Conservation Plan**

**Program Years 2024-2028**

**FirstEnergy Pennsylvania Electric Company**



**August 30 October 7, 2024**

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## Introduction

FirstEnergy Pennsylvania Electric Company's ("FE PA" or the "Company")<sup>1</sup> Joint 2024 - 2028 Universal Service and Energy Conservation Plan ("USECP") is provided to the Pennsylvania Public Utility Commission ("Commission") in accordance with Universal Service and Energy Conservation Reporting Requirements at 52 Pa. Code §§ 54.71-54.78 and the 2019 Amendments to the Policy Statement on Customer Assistance Programs ("CAP Policy Statement"), 52 Pa. Code §§ 69.261–69.267.

The Company is committed to providing customer-focused, quality-driven, results-oriented Universal Service and Energy Conservation Programs<sup>2</sup> in a cost-effective and holistic manner.

The goals of the Company's Universal Service and Energy Conservation Programs are to:

- Protect consumers' health and safety by helping low-income customers maintain affordable utility service.
- Provide for affordable utility service by making available payment assistance to low-income customers.
- Help low-income customers conserve energy and reduce residential utility bills through participation in the WARM program, the Company's Low Income Usage Reduction Program ("LIURP").
- Ensure Universal Service and Energy Conservation Programs are operated in a cost-effective and efficient manner.

The Company will continue to work with eligible customers in establishing affordable payment agreements that maintain electric service and move them toward self-sufficiency in paying their electric bill.

Beginning in 2017, the Company, through its predecessor electric distribution companies ("EDCs"), established a Universal Service Advisory Committee ("USAC") comprised of representatives from the Company, the Pennsylvania Office of Consumer Advocate ("OCA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Commission's Bureau of Investigation and Enforcement ("BI&E"), the Commission's Bureau of Consumer Service ("BCS") and the organizations that administer the Company's USECP, which holds meetings quarterly with respect to the Company's programs and other relevant data points relating to customer service and remote

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<sup>1</sup> On January 1, 2024, FirstEnergy's Pennsylvania operating companies (*i.e.*, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) merged into FirstEnergy Pennsylvania Electric Company. Due to the Pennsylvania Consolidation ("PA Consolidation") transaction, the affected operating companies' tariffs were consolidated into a single tariff, with each former operating company's rates becoming its own rate district: Met-Ed Rate District ("Met-Ed"), Penelec Rate District ("Penelec"), Penn Power Rate District ("Penn Power"), and West Penn Rate District ("West Penn").

<sup>2</sup> As defined in Section 2803 of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2803, "universal service and energy conservation" refers to those "policies, protections and services that help low-income customers to maintain electric service. The term includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education."

terminations.<sup>3</sup> In addition to the parties mentioned above, the Company has recruited representatives from local community agencies. The USAC's purpose is to explore opportunities for enhancements to the Company's USECP programs, as well as opportunities for outreach and education, language access, notification to low-income customers regarding topics of interest to include security deposit waivers and bill clarity. At the Company's sole discretion, process or program changes raised through the USAC may be filed for approval with the Commission as proposed revisions to the Company's USECP on a case-by-case basis.

### Consumer Group Representation

Pennsylvania Utility Law Project  
Community Legal Services of Philadelphia  
Office of Consumer Advocate

### Regulatory Representation

Bureau of Consumer Services

All costs associated with the Company's USECP are funded through the Company's Universal Service Cost Rider.

This plan describes the Company's portfolio of USECP programs for the program years 2024-2028. In order to align the Company's low-income program, Pennsylvania Customer Assistance Program ("PCAP"), with the 2019 Amended CAP Policy Statement, PCAP will no longer be a fixed credit program. The core changes are as follows:

- Fixed monthly credits and associated recalculations will be eliminated.
- The monthly bill will be based on a percentage of income-payment ("PIP") established by heat type and federal poverty level, with a minimum bill component. Accounts will not be on the equal payment plan ("EPP") or experience true ups.
- New subsidy limits applicable to all FE PA rate districts will be based on the number of credits projected to serve 80% of PCAP participants.
- Recertification periods will be lengthened as defined in the CAP Policy Statement.

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<sup>3</sup> The USAC was a product of the Company's, through its predecessor EDC's, 2016 base rate cases. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa. Pub. Util. Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017). As a result of the PA Consolidation proceeding, FE PA made a number of commitments which impact the administration of its low-income programs. To the extent a settlement term affects a specific provision within the USECP, those revisions are reflected within the plan. All other applicable settlement provisions are outlined in Attachment B. *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience*, Docket Nos. A-2023-3038771, *et al.* (Order entered December 7, 2023); *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Involuntary Remote Disconnect Procedures*; Docket Nos. P-2019-3013979, *et al.* at pp. 13-14 (Order entered July 3, 2023).

- Participants will no longer be graduated or denied enrollment due to low energy burdens. Participants that do not receive monthly credits or forgiveness credits from PCAP may receive other benefits associated with being on the program.

In order to implement these modifications, programming changes are required. Due to this programming effort, it will be necessary to remove PCAP participants from the EPP approximately three months prior to the actual conversion date of the new program logic. This change will impact the monthly amount billed to PCAP participants and new enrollments during this period. As a result, the Company will stop collection activities for active participants from the effective date of the EPP removal until the conversion date. Upon conversion, all unpaid balances will become preprogram arrears which will be subject to arrears forgiveness credits based on 12 months of forgiveness. Existing PCAP customers who have less than 12 months remaining to achieve full forgiveness will not have that timeframe extended due to this change. Existing PCAP customers who have less than 12 months remaining under the 36-month pre-program arrears (PPA) forgiveness timeframe will receive full arrearage forgiveness over those remaining months. This allowance will not extend to existing PCAP customers who have non-PCAP, and in-program arrears added to the PPA balance for forgiveness over 12 months.

Customers will not be eligible for retroactive credits until a removal for failure to reverify or failure to participate in WARM has been processed under the new program. Customers will be notified by mail in advance of changes being made to their account. The communication will include an explanation of the change being made, who to contact with questions, and an overview of the upcoming program changes. A second communication will be mailed when the new program is implemented which announces the program change, defines changes to the bill statement, and explains program benefits.

## CARES

### Overview and Objectives

The CARES program provides short-term assistance to payment-troubled residential customers. Based upon the circumstances of each customer, the CARES representatives make referrals to social service agencies and provide information on appropriate Company and/or external programs. Many CARES referrals are subsequently enrolled into PCAP.

CARES supports community outreach events, such as the annual Be Utility Wise events sponsored by the Commission, annual hardship fund fundraisers, and senior fairs.

### Eligibility

Any customer experiencing a recent hardship such as:

- Serious illness or injury to a member of a household
- Death of a wage earner
- Marital or family problems
- Handicapped or disabled person
- Sudden loss of income to the household
- Any customer 60 years of age or over requiring special assistance

### Tracking

When tracking CARES referrals, basic account information is documented for the actions taken in response to the customers' situations.

### CARES Organizational Structure

A portion of the following employees' time supports this program:<sup>4</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

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<sup>4</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

## Dollar Energy Fund

### Overview and Objectives

The Dollar Energy Fund ("Fund") is an emergency hardship fund designed to help residential customers who have suffered a recent financial hardship and need temporary help to pay their electric bill. The bulk of program funding is provided by contributions from the Company's stockholders, employees, customers, and the Dollar Energy Fund. The application for funds is processed by the Dollar Energy Fund.

### Dates of Operation

The Fund accepts applications in accordance with pre-established account status guidelines, or if funds remain available. Program dates are as follows:

Period	Account Status
October 1 – November 30	Service Terminated or Pending Termination
December 1 – January 31	Service Terminated
February 1 – February 28	Service Terminated or Pending Termination
March 1 – September 30	Open to All Non-PCAP Customers  PCAP customers with Pending Termination or Service Terminated are also eligible.  As the availability of funds reduces during this period, account status is subject to change until the program is closed based on priority: Service Terminated or Pending Termination, Service Terminated, or Closed.

### Maximum Grant Amount

One maximum grant of \$500 may be awarded to a customer during a program year.

### Contacts and Administering Agencies

The Company's contact person is:

Leonard Howell, FirstEnergy Corp., 5001 Nasa Blvd, Fairmont, WV 26554  
Telephone: 681-753-5518; Email: lhowell@firstenergycorp.com

The Dollar Energy Fund contact person is:

Chad Quinn, Chief Executive Officer, The Dollar Energy Fund, Inc.,  
P. O. Box 42329, Pittsburgh, PA15203-0329  
Telephone: 412-390-3863; Email: cquinn@dollarenergy.org

### Eligibility Guidelines

- The residence must be a residential single home or apartment.

- The name on the account must be an adult resident.
  - Residency exception will be made for ratepayers assigned to active military duty.
- The applicant must provide income information.
  - Total household income (gross) must be at or below 250% of the Federal Poverty Income Guidelines (“FPIG”).
  - Exceptions will be made based on circumstances. Some examples of acceptable hardships are:
    - High out-of-pocket medical expenses;
    - Head of household had to quit work to care for a sick family member;
    - Fire, flood, or other disaster.
- The customer must have paid a minimum of \$150 or the equivalent of three PCAP bill amounts, whichever is less, on their account within the past 90 days. If age 62 and over, the customer must have paid a minimum of \$100 or the equivalent of three PCAP bill amounts, whichever is less.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.
- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Company reserves the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

### **Dollar Energy Fund Organizational Structure**

A portion of the following employees’ time supports this program.<sup>5</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services-Universal Service  
Business Analyst (2) – Various Levels  
Customer Accounting Associate (2) – Various Levels

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<sup>5</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

**Needs Assessments for Hardship Fund:**

The Hardship Fund Needs Assessment is based on income levels at or below 250% FPIG for all active residential accounts in arrears greater than 30 days at year end.

<b>Met- Ed Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	2,887	2,409	3,653	4,030
<b>151 - 200 %</b>	5,039	4,159	6,113	6,756
<b>&lt; 150 %</b>	29,406	23,475	27,580	29,202
<b>Total</b>	<b>37,332</b>	<b>30,043</b>	<b>37,346</b>	<b>39,988</b>

<b>Penelec Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	2,864	2,474	3,545	3,886
<b>151 - 200 %</b>	5,400	4,379	6,079	6,458
<b>&lt; 150 %</b>	35,311	28,569	32,502	33,827
<b>Total</b>	<b>43,575</b>	<b>35,422</b>	<b>42,126</b>	<b>44,171</b>

<b>Penn Power Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	675	594	854	950
<b>151 - 200 %</b>	1,268	1,107	1,496	1,559
<b>&lt; 150 %</b>	7,885	6,788	7,702	7,757
<b>Total</b>	<b>9,828</b>	<b>8,489</b>	<b>10,052</b>	<b>10,266</b>

<b>West Penn Power Hardship Needs Assessment</b>				
<b>FPL</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>201 - 250 %</b>	3,171	2,621	3,840	4,243
<b>151 - 200 %</b>	5,796	4,530	6,470	6,814
<b>&lt; 150 %</b>	33,367	26,406	29,616	31,583
<b>Total</b>	<b>42,334</b>	<b>33,557</b>	<b>39,926</b>	<b>42,640</b>

## Gatekeeper Program

### Overview and Objectives

Gatekeeper is a program where Company field personnel recognize and report customers who may be in "distress" as described below.

### Eligibility Guidelines

Situations include, but are not limited to, the following:

- Communication – A person who appears confused or disoriented;
- Economic Condition – Someone expresses difficulty with paying bills;
- Social Condition – Older persons living alone or socially isolated;
- Physical Limitations – Severe difficulty seeing, speaking, hearing, or moving about;
- Condition of Home – In need of repair, neglected yard, accumulation of newspapers, offensive odors, or unattended pets.

### Gatekeeper Organizational Structure

A portion of the following employees' time supports this program.<sup>6</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services-Universal Service  
Business Analyst (8) – Various Levels

## PCAP

### Overview and Objectives

PCAP helps residential customers maintain electric service and eliminate past-due balances. PCAP offers a reduced bill to customers, based on a PIP and debt forgiveness. The objectives of PCAP are to:

- Improve a customer's payment ability and consistency
- Reduce a customer's consumption of electricity
- Eliminate debt

### Eligibility Requirements

- Total gross household income<sup>7</sup> is at or below 150% of FPIG.
  - The Company adopts the updated FPIG annually within a month after they are published in the *Federal Register*.

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<sup>6</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

<sup>7</sup> 66 Pa. C.S. § 1403: Definition of "**Household income.**" The combined gross income of all adults in a residential household who benefit from the public utility service.

- Proof of household income can be for either the past 30 days or 12 months, whichever is more representative of their actual annual income.
- The Company requires households reporting zero income to complete a zero-income form. The Commission-approved form was modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
  - Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits.
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month. A credit is not provided when the customer exceeds the annual subsidy limit and did not receive an exemption.
  - Participants are not required to receive one or both credits to be on PCAP.
- If eligible, the customer must agree to apply for the LIHEAP program. Applicants will be informed of this obligation at the time of enrollment and recertification.
- If eligible, the customer must agree to participate in the WARM program.

## Intake Process

Customers are required to complete an application to apply for PCAP, recertify eligibility, or to re-enroll after being removed from the program.

If a customer final bills as a PCAP participant, the Company charges PCAP participants no more than their prorated PCAP bill (*i.e.*, PIP, minimum bill, or actual tariff charges) for usage incurred during the customer's final billing period. The Company uses the following guidance to determine if a final billed PCAP participant is required to complete an application:

- When an active participant moves out of a location, the PCAP program will follow the customer to the new location provided the original recertification date is a future date. PCAP will follow the customer and resume on the new account.
  - Note: If the customer is moving between Penn Power and one of FE PA's other rate districts (Met-Ed, Penelec, or West Penn), the customer may contact the Customer Care Center can request PCAP be transferred to the new account. A bill print message will be printed on the Penn Power final bill advising customers how to contact the Customer Care Center to request the PCAP transfer.
- If a customer is moving to a new location within 12 months of the last move-out date but the original recertification date is expired, PCAP will follow the customer to the new location and the customer will receive notification to complete recertification or be removed from the program within three months.
- If a customer is moving to a new location more than 12 months after the last move-out date and the original recertification date is expired, PCAP will not transfer to the new account.

Dollar Energy Fund, Inc. is the current PCAP administrator for the Company and processes the PCAP applications for new enrollments or recertifications into PCAP. The administrator can educate and assist the customer with referrals to assistance programs, such as WARM, the Dollar Energy Fund grant program or LIHEAP. Customers may apply for the program by contacting Dollar Energy Fund as follows:

- Call 888-282-6816.
- Complete an online application at pabillassist.com.
- Print and mail a paper application from the firstenergycorp.com/billassist website. Customers may also request a paper application from the Customer Care Center. The paper application includes the standard zero-income form.

The administrator may also contact participants to initiate a text-to-recertify process. Data rates may apply.

While most applications may be processed by phone or online, the Company reserves the right to request an in-office appointment. Dollar Energy Fund maintains contracts with other community-based organizations (CBOs) where customers can be directed to complete the application process on an as-needed basis.

During the initial call, customers may be asked to provide all household members' names, dates of birth and submit proof of income for adults. If the PCAP administrator can verify the customer received LIHEAP in the past 12 months, the customer will not be required to submit income documentation. The application will be submitted based on the information provided by the customer.

~~Additionally, if the customer provided authorization to the Department of Human Services to share the household and income data from their LIHEAP application with the Company, the account will be automatically recertified. If the customer is not a PCAP participant, outreach is completed to advise the customer to contact the Dollar Energy Fund or apply online. The customer will not need to submit income documentation when applying for PCAP unless the data is no longer accurate, or the LIHEAP data has expired. The LIHEAP data will be populated on the application for the customer. The customer will receive a letter to confirm the LIHEAP data from the Department of Human Services ("DHS") was used to recertify or enroll. A separate letter is mailed to confirm the recertification or enrollment application was processed.~~

The documentation may be submitted by fax, mail, email or online, if an online application is submitted.

Fax: 412-515-1661  
Mail: Dollar Energy Fund, PO Box 42329, Pittsburgh, PA 15203  
Email: FirstEnergy@DEFDocs.org  
Online: pabillassist.com

The completed records are downloaded to the Company's host SAP system each business day in a single batch process. Upon successful completion of enrollment, the customer is notified by letter. After the initial billing of a new enrollment, communications will be made to the customer to describe the benefits of the program and the bill.

During this plan period, the Company will be evaluating its intake system and processes for enhancements to provide improvements to the application process and/or submission of income documentation for customers.

**Percentage-of-Income Payment (“PIP”)**

The PIP is based on heat type, income, and federal poverty level.

Federal Poverty Level	Non-electric Heat Type	Electric Heat Type
< 50%	2%	6%
51 - 100%	4%	10%
101 – 150%	4%	10%

The monthly asked-to-pay amount is calculated as:

Monthly income \* % by Heat Type and FPIG = Percentage-of-Income Payment (PIP)

To control program costs and institute minimum payment requirements, the PIP will have a minimum established for customers per month.

Heat Type	Minimum Bill
Non-Electric	\$12
Electric	\$45

Examples:

Monthly income = \$1200  
 FPIG = 51-100%  
 Heat type = non-electric  
 PIP percentage = 4%  
 $\$1200 * 4\% = \$48$   
 The customer’s monthly PIP is \$48.

Monthly income = \$500  
 FPIG = < 50%  
 Heat type = non-electric  
 PIP percentage = 2%  
 $\$500 * 2\% = \$10$   
 The calculated PIP is \$10; however, the minimum bill is \$12. The customer’s monthly PIP will be \$12.

PCAP participants will be asked to pay either the percentage-of-income payment or the actual charges each month. If the actual charges are less than the percentage-of-income payment, the customer will be asked to pay the actual charges. If the actual charges are more than the percentage-of-income payment, the customer will be asked to pay the PIP amount and a subsidy credit will apply to the difference.

Examples:

Actual charges = \$100  
 PIP = \$75

- Customer will receive a \$25 PCAP credit and will be asked to pay \$75.

Actual charges = \$75

PIP = 100

- Customer will not receive a PCAP credit and will be asked to pay \$75.

The PIP will be prorated for bill periods that are less than 26 days.

**PCAP Credits**

An annual subsidy amount is provided to the PCAP participant to reduce the monthly bill charges to the percentage-of-income amount. The subsidy amount will be established at enrollment for use through the December billing.

- Subsidy will credit the customer’s account for the difference between the actual charges and the PCAP percentage-of-income amount. If the customer is billed actual charges in the month, a subsidy credit is not required.
- If the household exhausts the annual subsidy before the December billing, the PCAP bill will be for the actual charges until the January bill is issued. The customer’s account remains on PCAP and remains exempt from late payment fees and security deposit assessment.
- At the January billing, the subsidy amount will be reset to the full annual allotment for use in the new calendar year. If the customer did not exhaust the subsidy limit in the prior year, it will not be carried over to the next year.
- The amount of subsidy is based on the household’s federal poverty level and heat type as follows:

<b>Max Subsidy Credit Limits for PCAP for All Rate Districts FPIG Level</b>	<b>Electric Non-Heating (ENH)</b>	<b>Electric Heating (EH)</b>
<b>0%-50%</b>	\$2,250	\$3,150
<b>51%-100%</b>	\$1,650	\$2,350
<b>101%-150%</b>	\$1,300	\$1,700

FE PA will file and serve an amendment to its 2024 USECP reflecting any increase to the PCAP subsidy credit limits by the same percentage of any distribution rate increase at the USECP dockets by or before the date of implementation of those increased subsidy limits.

FE PA shall perform outreach to PCAP customers when they exceed 50% and 80% of the subsidy credit limits to make them aware of the exceptions and how to notify the Company if they believe they qualify for an exemption. All customers who exceed 80% of their subsidy credit limits will be referred to the WARM program (LIURP) for energy efficiency measures or education unless there is a valid reason for a waiver.

FE PA is obligated to waive the subsidy credit limits for customers who meet the CAP Policy Statement exemptions. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household’s ability to control.
- The household is in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

Based on the changes in this program, quarterly account monitoring becomes unnecessary. The Company's revised PCAP program will offer one billing method that automatically bills the customer the PIP or the actual charges, whichever is less, making it unnecessary to evaluate the billing method quarterly.

Annually, the Company will identify participants that had annual usage for the calendar year exceeding 125% of the participant's prior year usage provided the customer resided at the same location during that time. For these participants, the Company will complete outreach quarterly throughout the following year to provide energy conservation messages when customers are not exempt. All participants are evaluated for the WARM program at enrollment or scheduled recertification. As the Company schedules WARM jobs with contractors, jobs with the highest usage are prioritized first.

When customers exceed 125% of the historical usage, the account will be reviewed to determine if the account can be identified as exempt from the consumption limits. Customers will be mailed a survey to complete and a postage-paid envelope. The survey responses will be reviewed with the USAC annually for the duration of this USECP. Under 52 Pa. Code § 69.265(3)(vi), a utility may exempt a household from a PCAP control feature if one or more of the following conditions exist:

- The household experienced the addition of a family member.
- A member of the household experienced a serious illness.
- Energy consumption was beyond the household's ability to control.
- The household is in housing that is or has been condemned or has housing code violations that negatively affect energy consumption.
- Energy consumption estimates have been based on consumption of a previous occupant.

### **Debt Forgiveness Guidelines**

When entering PCAP for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When entering PCAP under the USECP 2024-2028 plan for the first time, all preprogram debt will be deferred and included in the PCAP debt forgiveness component.

When recertifying for PCAP following the first enrollment, additional dollars are not deferred (past due PCAP bills).

For participants removed from PCAP, preprogram debt is due and subject to collection activity. Customers are responsible to pay all charges including preprogram balances.

When re-enrolling into PCAP, all preprogram debt will be deferred and included in the PCAP debt forgiveness component if the initial deferral was \$300 or less. If the initial deferral was more than \$300, only the remaining (not yet forgiven or paid) preprogram debt from the first PCAP enrollment will be re-deferred and included in the PCAP debt forgiveness component. All other past-due, ask-to-pay amounts on the bill will remain due and subject to collection activity after either re-enrollment or re-certification into the program.

While a participant, debt forgiveness credits (1/12 of preprogram debt) will be awarded retroactively in response to full monthly bills being paid, whenever those payments occur, regardless of PCAP arrears. Debt forgiveness credits will be applied in response to any type of payment or credit, including assistance grants, which paid the bill in full. When awarded, credits are applied at monthly billing. PCAP participants must remain in the Company's standard residential billing cycle (twenty-day due date) for debt forgiveness credits to be awarded by the host computer system.

When the full preprogram debt has been forgiven and they no longer have a preprogram arrearage balance, a customer is no longer eligible for debt forgiveness, but the account will remain in PCAP.

### **Default Provisions**

PCAP customers who fail to make timely bill payments will be subject to the collection cycle.<sup>8</sup>

Dunning notices, including termination notices, will be issued for any unpaid current bills. Deferred preprogram debt balances will not be included in dunning notices. PCAP participants who do not make payments in accordance with the program terms will remain in PCAP and be subject to PCAP dunning processes, including service termination. PCAP dunning processes include all the notification and procedural steps required by 52 Pa. Code § Chapter 56.1, *et seq.*, and 66 Pa. C.S. § Chapter 1401, *et seq.* The Company is compliant with the CAP Policy Statement and initiates collection activity for CAP accounts after no more than two payments are in arrears. Participants are not removed or defaulted from PCAP as a precursor to termination for non-payment.

Payment requirements to avoid termination of service:

Past due charges are brought current.

Payment requirements for restoration of service following service termination:

Past due charges are brought current, and  
Reconnection fee per the current tariff is paid.

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<sup>8</sup> *Guidelines for Universal Service and Energy Conservation Programs*, Docket No. M-00960890F0010 (Final Order entered Jul. 10, 1997). Under Customer Assistance Programs, Default Provisions: “The Commission believes that the consequences for nonpayment should be loss of service; therefore, we recommend that participants who do not make payments should be returned to the regular collection cycle.”

## Dismissal from PCAP and Re-entry into PCAP

Participants may be removed from PCAP for any of the following reasons:

1. Refusing to participate in WARM if eligible (re-entry is dependent upon participation in the WARM program),
2. Failing to recertify as scheduled, or upon request (re-entry is dependent on completion of re-certification procedures),
3. Theft of service (re-entry prohibited for six months),
4. Other actions deemed to be intentional and fraudulent (re-entry prohibited for six months),
5. Other actions, including but not limited to, failure to permit scheduled meter readings, and pattern of returned check may result in disconnection of service and final billing or removal from the program.

After removal from PCAP, customers may re-apply to PCAP if they resolve the reason for dismissal and meet the eligibility parameters identified above.

Upon re-entry to PCAP after removal for failure to recertify income or failure to participate in WARM, customer accounts may receive missed subsidy and/or forgiveness credits for months billed while not in PCAP if the account was removed within the past 12 months. After 12 months of removal, PCAP applicants are no longer eligible for retroactive subsidy and/or forgiveness credits. Any remaining amount will be paid by the PCAP participant.

- Missed subsidy credits will not be applied for an amount that exceeds the account balance less remaining unpaid preprogram arrearages and/or miscellaneous fees.
- When a customer removed from PCAP moves from one location to the next, the missed credits will only be applied if the customer enrolls for the first account activated following the final account where PCAP was removed.
- Missed forgiveness credits will not be applied for an amount that exceeds the remaining unpaid preprogram arrearages and is only applied for full monthly bills that were paid.

Customers that re-enroll more than 12 months after removal from the program are not eligible for retroactive forgiveness or subsidy credits. For those customers, only the remaining unpaid preprogram debt will be re-deferred at enrollment for future arrears forgiveness unless the initial balance deferred was less than \$300 as described previously in Debt Forgiveness Guidelines.

Customers removed for any reason other than failure to recertify or failure to participate in WARM are not eligible for retroactive credits at any time.

## Recertification Requirements

PCAP participants are advised at the time of application that they must recertify eligibility as scheduled or when gross household income, household size, or heat source changes. Customers will be able to recertify over the telephone, online, by mail, or by giving consent on their LIHEAP application to share application data with the utility. A notice to recertify is mailed to PCAP participants 60 days prior to the benefit end date including information on when benefits will expire and how to complete the recertification process. A message is printed on the participant's electric bill at this time. If necessary, a message is printed on the participant's electric bill 30 days prior to the benefit end date and a reminder letter is mailed. Reminder calls will be placed to the customer at 45 and 15 days before the recertification date. If the customer does not successfully complete recertification, the account will be removed from PCAP. Once removed, the customer will receive a letter that explains the account has been removed from PCAP for failure to recertify and provides instructions on how to reapply.

To recertify, PCAP participants will be required to submit the required household income and household member information by U.S. mail, fax, or online, if applying online, ~~unless their household income has been received from DHS via the LIHEAP application data process in the current or prior program year.~~ Dollar Energy Fund may also contact participants to complete recertification via text message. Data rates may apply.

Completed enrollment or recertification records are transferred to the SAP host system each business day through a batch process, which extends the Benefit End Date based on the income source.

The period for recertification will vary based on income source as follows:

Income Source	Recertification Period
Zero-Income	6 months
SSI, Disability, Pension	3 years
All others	2 years

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

### Application of Customer Payments and Assistance Grants

Customer payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

Assistance Grants:

#### LIHEAP

LIHEAP helps eligible customers on low or limited incomes pay their heating bills through energy assistance grants. A customer is not required to have an unpaid bill to receive energy assistance. DHS administers LIHEAP and establishes dates in which LIHEAP is available. Various efforts, such as bill inserts, letters, call campaigns, social media and customer referrals are attempted to encourage customers to pursue LIHEAP funds when available. All eligible customers are encouraged to apply for LIHEAP benefits.

LIHEAP payments are:

- First applied against delinquent bills (customer payment obligation)
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation) or in accordance with DHS' directives stated in the annual LIHEAP State Plans

#### Dollar Energy Fund

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bill (customer payment obligation)
- Third applied against future bills (customer payment obligation)

#### PA HAF

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bills (customer payment obligation)
- Third, applied against deferred arrears (customer payment obligation)
- Fourth, applied against future bills (customer payment obligation)

#### ERAP

- First applied against delinquent bills (customer payment obligation), to avoid service termination
- Second, applied against current bills (customer payment obligation)
- Third, applied against future bills (customer payment obligation)

#### **Excess PCAP Credits**

Subsidy credits are not included in refund checks issued to customers. Subsidy credits will be adjusted from the customer's account balance when:

- The subsidy credit exceeds the total account balance, and a final bill has been issued. If the customer established another account, the excess credits may be transferred to the new account instead.
- The subsidy credit exceeds the total account balance, and the credit has been open for 18 months or more.

#### **Program Delivery Partners**

The Company will continue the use of CBOs referenced in Attachment A for the daily administration of the USECP. The Company currently contracts with Dollar Energy Fund as the administrator for PCAP applications and recertifications, grant applications, and referrals to WARM and other assistance programs. Dollar Energy Fund is a non-profit agency with an established network of CBOs to process intake for assistance programs and grants.

Subject to the provisions of any implementation orders or other direction issued by the Commission, at such time that the Pennsylvania DHS notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, FE PA will implement required modifications to its Information Technology ("IT") system and processes, within a reasonable time frame not to exceed one year, to automatically recertify an existing PCAP participant's income and eligibility. All related costs to modify IT systems and processes shall be eligible for timely recovery, including any interim costs related to manual processing. All LIHEAP recipients identified in the data exchange will be deemed by FE PA as confirmed low-income customers and will be eligible for winter shutoff protections. FE PA commits to conducting outreach to all LIHEAP recipients identified in the data exchange that are not current PCAP participants to encourage enrollment in the program.

#### **Quality Assurance Provisions**

During each calendar year, a representative of the Company, or its designee, shall audit the PCAP administrator to verify proper administrative processes have been performed in support of the PCAP application and recertification process. The areas of performance to be audited include, but are not limited to:

- Auditor received requested documents
- Case note documented for each customer contact
- Account status document reviewed
- Application completed when applicable
- Recertification completed when applicable
- Referred clients to other program(s) when applicable
- Proper documentation retained
- Hardcopy documentation recorded accurately
- Successfully enrolled clients into PCAP when applicable
- Measure administrator level of service

A combination of applications and recertifications processed by the administrator for the Company shall be reviewed during an audit. A sample size calculator will be used to identify a statistically significant sample size for the applications and recertifications. With the sample size calculator, the standard variables used will be a confidence level of 95% and a confidence interval of 5%.

Human Services prepares the designee, if any, with program information and reviews the audit expectations. The designee reviews each selected application to confirm the administrator followed the appropriate procedure in the application process. The results are tracked on a spreadsheet and reviewed with the Company. The Company and administrator discuss the audit results and coordinate the sharing of information to reinforce training with the administrator's staff and/or identify areas for improvement in workflow processing or technology.

### **Assessment of Security Deposits**

Security deposits are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

Upon PCAP enrollment [or when customers are determined to be income eligible for PCAP through receipt of a LIHEAP grant](#), a held deposit (if any) is refunded directly to the customer.

### **Assessment of Late Payment Charges**

Late payment charges are not assessed on PCAP accounts in accordance with 2019 Amendments to the CAP Policy Statement.

### **Customer Choice**

Per the Commission Order dated August 4, 2022, for the Joint Petition for Partial Settlement of the Default Service Plan<sup>9</sup>, customers enrolled in PCAP may not receive service from an electric generation supplier effective June 1, 2023.

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<sup>9</sup> *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Its Default Service Plan for the Period from June 1, 2023 through May 31, 2027*, Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, P-2021-3030021 (Order entered August 4, 2022).

## Consumer Education, Outreach and Referral (“CEOP”)

The CEOP is an evolving process and will be modified and enhanced as needed throughout the duration of the 2024 USECP.

As a PCAP participant, customers receive the following communications:

- Enrollment letter;
- Recertification letter;
- Reminder recertification letter with form, if needed;
- ~~Recertification confirmation letter;~~
- ~~LIHEAP data share confirmation letter, if needed;~~
- Confirmation letter of recertification;
- Removal letter, if needed;
- Subsidy-remaining letters when the customer has exhausted 50% and 80% of the annual limit;
- Quarterly mailings with energy conservation information when participants’ usage increased 25% compared to the prior year of service at the same location; and
- Outbound calls are also completed as part of the recertification process.

As a PCAP applicant, customers receive the following outreach:

- Email notifications from the pabillassist.com online application when income documents are required;
- Email notifications 10 days after the pabillassist.com online application is started. If documentation has not been received, a third email notification is sent if not received 20 days after the online application was submitted;
- Outbound calls from the Company to remind the customer the application is pending required documentation; and
- Mailed copy of the PCAP agreement when application is submitted.

~~As a LIHEAP participant that is not a PCAP participant, customers receive the following:  
Outreach letter to explain they may be eligible for PCAP and how to apply without providing additional documentation for household income.~~

Outreach to promote energy assistance program enrollment to customers 0-50% FPIG and higher is completed as follows:

- Outbound call campaigns in the 1<sup>st</sup> and 4<sup>th</sup> quarter to promote LIHEAP CASH and CRISIS;
- Participate in the CRISIS Utility File Transfer (UFT) program;
- Participate in the Turn On program, when open;
- Outbound call campaigns to promote PCAP enrollment;
- Email campaigns to promote PCAP enrollment;
- Bill inserts to promote all assistance programs;
- Letters are mailed to LIHEAP recipients that are not on PCAP when household and income information was shared by the Department of Human Services from the LIHEAP application;
- News release to promote all assistance programs twice per year;
- Monthly social media messages to promote an active program or assistance in general;
- Radio commercials to promote LIHEAP or PCAP;
- Corporate website provides information for assistance programs along with an interactive tool to help determine income eligibility;
- On hold message to direct customers to our website for assistance information;

- Provide education and promote enrollment to customers or agencies via Be Utility Wise, senior fairs, expos, etc.;
- Distribute printed materials to community agencies;
- Door hangers for field collections;
- Referral information included on letters related to credit denial, security deposits, termination, etc.;
- Referral information provided to customers during inbound contacts.

The Company makes the following available to Spanish-speaking customers:

- PCAP agreement;
- Program letters include Spanish verbiage;
- PCAP brochures for distribution, live events, or online reference;
- PA LIHEAP bill insert includes Spanish verbiage;
- Dollar Energy Fund is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers; and
- The Company has interpreting services available for inbound inquiries.

With the implementation of a revised PCAP program, the Company will establish opportunities for community agencies to attend universal service training. A schedule of these events and venue (virtual, in-person or both) will be determined based on the known circumstances, such as weather, health, and safety considerations.

### **PA Customer Assistance Program Organizational Structure**

A portion of the following employees' time supports this program.<sup>10</sup>

Manager Revenue Operations Strategy  
Administrative Assistant  
Supervisor – Human Services – Universal Service  
Business Analyst (7) – Various Levels  
Customer Accounting Associate (2) – Various Levels

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<sup>10</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

## WARM Program

### Program Overview and Objectives

The WARM program is the name of the Company's Low Income Usage Reduction Program. The program provides energy education and energy conservation measures and services to low-income customers.

The program targets low-income customers who participate in PCAP or LIHEAP. The program's primary objectives are to:

1. Reduce the overall energy use, energy bills, and arrearages of low-income customers.
2. Improve participants' health, safety, and comfort in their homes.
3. Make personalized referrals to the Company's USECP and other assistance programs.

WARM achieves these objectives through two approaches. First, energy conservation improvements are installed, and inefficient appliances are replaced in the customer's home. Second, an energy conservation auditor provides energy education to family members and refers them to other potentially beneficial social service programs. All work performed through the WARM program is provided at no cost to program participants.

### Eligibility Guidelines

#### Income Eligibility:

Residential customers are eligible for WARM if their household income is at or below 150% of the FPIG. The Company also provides WARM services to customers with special needs whose household income is between 151% and 200% of FPIG. Commission regulations allow up to 20% of the WARM budget to be used for these customers. The definition has always included customers with overdue account balances, and the Company also includes those households with medical problems, personal crisis situations, and loss of income. This allows more customers under 200% of FPIG to participate in the program without requiring or encouraging an account arrearage.

#### Residency Eligibility:

The customer must reside at the service address and have at least 6 months of consecutive service. Both homeowners and renters qualify for the program; however, renters must obtain landlord approval for permanent measures to be installed in the customer's home that reduce seasonal kWh use, such as air sealing and insulation. If landlord approval is not received, only baseload measures will be installed (e.g., smart power strips, LED lightbulbs, and customer owned refrigerator or freezer replacements. If a landlord agreement is received by the company, providing consent to participate, a copy of the signed agreement form will be provided to both the landlord and the tenant.

The customer must agree to share his or her electric use information with the Company's agencies/contractors. In addition, the customer must allow contractors to have access to the home to perform appropriate program measures and quality assurance inspections.

Homes previously served by the program may receive WARM services again after 5 years if the home continues to meet the program eligibility guidelines. The Company will consider waiving the 5-year stay-out

requirement if full measures were not completed the last time the home was served, such as air-sealing and insulation. Exceptions may also be made if barriers that prevented the installation of full weatherization measures have been resolved.

Electric Use Eligibility and PCAP Participation Provision:

Customers who meet program income guidelines and have annual electric usage of 6,000 kWh or more qualify for the WARM program, if their home has not been weatherized in the last 5 years. No minimum usage will be required for customers who are having their WARM services coordinated with another program, such as the PA Weatherization Assistance Program (“WAP”) or a Natural Gas Distribution Company (“NGDC”), allowing most services to be provided at the same time. In these cases, and when a fossil fuel heating system is present, most full-service weatherization measures must be paid for by other program partners, and their costs must be documented in the program management system.

If a customer participates in PCAP and they are eligible for the WARM program, (i.e., meeting electric usage requirements and the home has not been served within the last 5 years) they are required to participate in the program to continue to receive PCAP benefits. This includes receiving an in-home energy evaluation, developing an energy-savings plan with the energy auditor and permitting the installation of energy saving measures that will help reduce the home’s electric usage. The Company may make exceptions for customers refusing to participate if the circumstances are beyond the customers’ control. This requirement will be waived only if the Company determines there is a valid reason the measures cannot be installed (i.e., such as medical reasons). Failure to respond to WARM scheduling contacts or refusal to allow the installation of measures are not valid reasons to waive this requirement without justification.

Contractors will make at least two phone calls and send two letters to a customer waiting one week in between each attempt before canceling a WARM job after which the company will pursue removal of the customer from PCAP. Missed PCAP credits will be reinstated retroactively if the customer chooses to participate in the WARM program and receives the appropriate services.

Applying for the WARM Program

Program eligibility is determined when a customer contacts Dollar Energy to apply for PCAP by calling or applying online. In addition, the customer may submit a paper application via mail, fax, or email.

Dollar Energy accepts verbal consent for participation in the WARM program if the customer agrees to voice recording. The customer service agent will document the customer’s consent in their system, and written confirmation will be provided to the customer that includes the terms and conditions agreed upon during the call.

**Marketing**

To reach this customer segment, the application intake process for the PCAP and WARM programs has been streamlined to determine a customer’s eligibility for both programs at the same time. This process has proven to be a cost-effective comprehensive approach to helping low-income customers who could benefit from these programs.

All letters and applications are available in Spanish, and the WARM program uses a translation service for customers who speak a language other than English.

Geographic marketing tactics include a combination of mass communication vehicles and one-on-one communications, such as newspaper, cable TV, search engine marketing, bill inserts, and direct mail campaigns. Community presentations are also used to inform customers about the program.

A bill insert providing details on available customer assistance programs, including the WARM program, is sent annually to all residential customers. Program information and eligibility requirements are also shared with customers during fall and winter collection activities and distributed in customer winter surveys.

Cross-marketing with Act 129 programs is optimized. Customers may obtain program information by: 1) accessing the Company's *energysavepa.com* website; 2) reviewing program materials provided to them when they participate in the Act 129 appliance recycling program and/or appliance rebate program; and 3) receiving program advertisements included in customized Home Energy Reports.

The Company plans to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, social media, and piloting creative incentives to help identify and provide services to customers in need. The Company also plans to update materials used in outreach efforts.

### **Heating and Cooling Budget Calculation Per Home**

The selection of measures designed to reduce electric heating and cooling is guided by a cost-effective budget calculation (seasonal allowance) for each home, based on past electric consumption with consideration also given to the regulatory seven-to twelve-year payback requirement. This calculation tool for contractors and agencies is not an absolute or prescriptive target for WARM. During the audit, if the site or customer needs are greater than the calculated budget, the contractor or agency will confer with the Company program manager after documenting reasons for proposing to go beyond the budget. The Company will decide to what extent additional work may be performed. This procedure allows higher budgets on higher-energy-use homes and prevents substantial use of funds on low-use homes where the potential for energy savings is less.

Increases in this seasonal allowance calculation are periodically implemented to keep pace with agency/contractor price increases.

The Commission granted the Company a temporary partial waiver of the LIURP regulation at Section 58.11(a) that restricts each installed measure to a payback period of seven or twelve years. The waiver shall apply only to heating jobs for which the audit indicates the home should receive comprehensive measures. The overall job must still be cost-effective and otherwise meet LIURP regulations. The waiver will extend for the duration of this USECP.

Baseload electric measures and appliance replacements are based upon on-site auditing and monitoring of energy use of the existing appliances. The replacement thresholds and procedures are updated periodically to reflect changes in costs and/or efficiencies.

## Energy Saving Measures

The specific measures installed, and actions taken are dependent on the customer's heat type, electric use, testing of appliances and diagnostic audit results. Customers and landlords have the right to refuse recommended measures. Contractors and agencies are required to install measures according to the program priority list found in the WARM Policy and Procedures Manual. Contractors are encouraged to consider cost effective custom measures and strive to meet relevant payback periods. Agencies and contractors provide one-year warranties on most measures and manufacturers may provide additional warranties. The following list identifies measures that customers may receive through the WARM program:

- Air conditioning/heating system filter replacement
- Appliance and water heater timers
- Attic, duct, basement, crawlspace, and perimeter air sealing (caulking, foam insulation & weather-stripping)
- Attic, wall, duct, floor, crawlspace, and perimeter insulation
- Blower door with pressure diagnostics to guide air sealing and duct sealing
- Boxing and damming of attic heat producing fixtures
- Central AC, Heat Pump, Mini Split Clean & Tune or Replacement
- Clothesline installation
- CO detectors
- Custom measures, (i.e., well pump or holding tank replacements, etc.)
- Dehumidifier Replacement
- Ductless heat pumps
- Electric Baseboard Repair/Replace
- Electric dryer venting installation, repair, or replacement
- Energy education
- Exterior/Storm Door Repair/Replace
- Faucet Aerators and Showerheads (Water Reduction Measure)
- Freezer/Refrigerator replacement
- Furnace whistle
- Furnace, Heat Pump, Mini Split Clean & Tune
- Heat Pump and Mini Split Installation/Replacement
- Heat Pump Clean & Tune
- Heat pump water heaters
- Heated waterbed mattress replacement
- Installing new exhaust fans
- Interior Door Repair/Replace
- LED lighting
- Plumbing Repairs (Hot Water Leaks and Faucet Replacement)
- Reflective roof coat to reduce cooling use
- Reflective window tint to reduce cooling use
- Remedial education as needed
- Repair and replacement of exhaust fans
- Sealing and insulating attic hatches
- Site specific health and safety measures, such as carbon monoxide detectors
- Smart power strips
- Smoke alarms
- Some aerator and showerhead replacement
- Some heating and air conditioning system replacement
- Some plumbing and electrical repairs
- Some storm and prime window and door repair or replacement

Thermostat replacement/repair  
Water heater pipe insulation  
Water heater replacement  
Window Reglaze/Replace Glass  
Window/Wall AC Gaskets  
Window/wall air conditioning unit replacement  
Repair or Replace Electric Hot Water Heaters

### **Energy Education**

The Company and agencies/contractors use a proven partnership approach with the customer. The customer is asked to partner with the program agency/contractor to develop energy savings strategies designed specifically to address the highest energy use areas of the home and its occupants. Auditors help customers understand what is driving their electricity usage by putting costs on choices and behaviors. Then the auditor and customer sign partnership and savings strategy agreements.

Approximately six months after the completion of WARM services, the Company sends customers congratulatory letters when usage has decreased more than 5% when compared to the same months before WARM services. A list of customers whose usage has increased more than 10% is provided to agencies/contractors for a follow-up phone call and visit to the customer if necessary. The agency/contractor will check if measures are working properly and whether the customer understands how to use them or if lifestyle or structural changes created the increased electric use.

Another education resource for WARM program participants is the Act 129 program Home Energy Reports that includes customized energy education messaging. These reports are sent to a subset of customers identified as low-income customers, including WARM participants.

The Company will continue to evaluate educational materials and tools for customers and auditors and make updates as needed.

### **Company's Organizational Structure**

A portion of the following employees' time supports the program.<sup>11</sup>

Manager Revenue Operations Strategy  
Supervisor – Human Services – Energy Conservation  
Business Analyst (9) – Various Levels  
Customer Accounting Associate (1)

### **Program Delivery**

The Company contracts with a network of CBOs and energy conservation contractors, referenced in Attachment A of this plan, to deliver program services. CBOs and energy conservation contractors may be eligible for incentives if they meet performance goals.

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<sup>11</sup> Due to periodic staffing level changes because of promotions, retirements, or new employees, the designation for the level of the positions is excluded. Staffing levels will not be reduced as a result of the PA Consolidation for the duration of this USECP.

Program auditors or crew members who make decisions about what measures will be installed in the home and who perform the combustion safety testing procedures, must be Building Performance Institute (BPI) certified as Building Analyst Professionals. BPI is a national standards development and credentialing organization for residential energy efficiency retrofit work. It is a non-profit organization that also provides training through a network of training affiliate organizations. The Company sponsors agency and contractor attendance at national and regional ACI Home Performance Conferences to allow agencies/contractors to obtain continuing education credits needed to retain their BPI certification.

The Company also holds WARM program training specific to USECP procedural issues or to meet the training needs of auditors and crew members. The Company recognizes that CBOs and energy conservation contractors have seen an increase in staff turnover since the pandemic began. During the plan years, the Company will continue to focus on training, utilizing webinars, in-person group sessions when practical, and one-on-one training when needed. Topics of emphasis will include:

- Auditing training for new auditors utilizing newly developed and timely materials
- Overcoming barriers to the installation of energy conservation measures
- Policy and procedure updates

The Company and its contractors benefitted from the roll out of the Low- Income Energy Conservation and Energy Efficiency Network (“LEEN”) program management and tracking system in 2019.

The LEEN system:

- Facilitates workload management using work queues
  - Allows tracking of deferred homes with health and safety issues
  - Helps to manage jobs in various stages
- Promotes effective communication and documentation through an enhanced user messaging system
- Provides dashboards to give graphical representations of progress towards goals
- Has robust reporting capabilities
- Features the automatic retrieval of customer information system data at the time of job creation, etc.

Future enhancements proposed for LEEN include:

- Invoice payment and SAP cost accounting system integration
- Incorporating the WARM energy audit into LEEN

### **Quality Assurance Provisions**

The Company plans to maintain the same level of third-party quality assurance inspections, inspecting 35% of total production. The quality assurance contractors will continue to focus most of their inspections on homes that have electric heat and supplemental electric heating or air conditioning. Greater oversight is needed in these homes because of the installation of comprehensive measures and combustion safety testing. The quality assurance contractor also delivers, or coordinates auditor, crew, and group training as needed and provides mentoring to new energy auditors.

The Company continues to use a WARM technical advisory Panel that meets two to three times per year and is on-call year-round. The panel members consist of agency and contractor auditors, and program managers from across Pennsylvania along with principal WARM quality assurance inspectors. The members have direct contact with customers and other assistance programs in other states. They

provide suggestions for program improvement, research innovative technologies, and test new measures and products.

Company program managers meet with all agencies and contractors annually to share program changes and solicit feedback. Company program managers work closely with individual agencies and contractors, often observing audits and crew work in the field.

The Company also strives to defer to the Department of Energy National Standard Work Specifications-based quality control inspection protocols on jobs coordinated with WAP where possible and practical.

### Coordination of Services

As recommended by the Commission, the Company will continue to direct agencies and contractors to coordinate delivery of WARM benefits with other programs. The Company works with WAP and NGDCs to coordinate delivery. Although coordination may allow for the efficient use of funding sources and resources, coordination may impact the program's overall electric energy savings. This is because the customers identified by NGDCs or WAP might not be the highest electric users targeted for participation in the WARM program. The Company waives the annual usage requirement on all coordinated jobs. When a surplus of low-income customers exists, the Company continues to prioritize customers by highest energy use first. Most WARM jobs are coordinated with an Act 129 program. WARM accepts applications from customers with incomes between 151% and 200% of the FPIG who live in buildings served by Act 129 multi-family projects.

The Company continues to find that many WARM participants are using supplemental electric heat in the winter even though the primary source of heat in the home is something other than electricity. Since this is a frequent occurrence, the Company strives to reduce the customer's supplemental electric heat use by coordinating services with the WAP and NGDC LIURP programs to repair gas or oil heating systems where possible.

To increase the accuracy of reporting coordinated jobs with other programs, functionality was added to the LEEN system that requires contractors to document coordinated job information.

The Company will continue to provide energy usage data to the Department of Community and Economic Development to assist in its WAP energy saving studies.

### Health and Safety/~~Accidentals~~

~~An~~ Health and safety measures are installed to allow WARM contractors to proceed with the installation of energy-auditor will check the -saving measures at a customer's home for. The purpose of health and safety issues and determine what measures should be takenis to ensure a safethat WARM's energy-saving measures may be installed and operate safely. Examples of such measures include:

- Roof repairs
- Knob and tube wiring remediation
- Damming of heat producing light fixtures; and
- Flue repairs

~~comfortable environment.~~ Certain health and safety measures may help protect a home's occupants, but typically do not lead to reduced electricity usage. Such measures include, but are not limited to:

- Smoke alarms and carbon monoxide detectors; and
- Pressure relief valves and overflow pipes on water heaters.

~~A separate budget for incidentals is available to address barriers that are preventing the installation of energy savings measures. This budget is 50% of the jobs seasonal allowance budget. For example, if the seasonal allowance budget is \$4000, the budget for incidentals would be \$2000. The \$2000.00 is available to make necessary repairs, allowing the WARM contractor to proceed with the installation of energy-saving measures.~~

~~Examples of such measures include:~~

- ~~• Minor roof repairs~~
- ~~• Knob and tube wiring remediation~~
- ~~• Damming of heat producing light fixtures; and~~
- ~~• Flue repairs~~

Where customers have a fossil fuel heating system, the ~~Company performs~~Companies perform combustion safety testing to ensure safe use of combustion appliances/systems whenever measures are installed that impact the building envelop (e.g., air sealing). WARM contractors adhere to the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 62.2 ventilation standards.

The Companies allow up to 50% of the seasonal allowance to be spent on health and safety measures. This is in addition to the seasonal allowance funds to install energy reduction measures. Contractors are encouraged to reach out to their Company program manager when additional health and safety funds are needed to fully address barriers to the installation of energy reduction measures.

## Disqualified or Deferred Homes

Contractors are encouraged to contact their WARM program manager when additional funds are needed to fully address barriers to energy reduction measures installation. Contractors are also encouraged to coordinate jobs with other weatherization programs when applicable.

Sometimes a weatherization contractor encounters a condition in the home identified as a health and safety issue or a barrier prohibiting the installation of energy saving measures that is outside the scope of the WARM program. In such cases, the customer will be provided with an H&S Conditions and Findings Form, outlining the issue and what must be resolved for the job to continue.

If the issue is resolved the contractors will return to install the additional energy saving measures. Contractors are encouraged to coordinate with other programs and/or refer homes with major safety issues to programs that address such issues. The Company will track deferred homes indefinitely for re-evaluation if additional programs or funding become available.

## Reporting

The following reports are submitted to the Commission or Department of Human Services on an annual basis:

- LIURP production, expenditures, cost of jobs and goals report March 1
- Universal Service Program (LIURP Section) April 1
- Conservation economics and energy planning bureau report April 30
- LIURP annual energy savings impact evaluation April 30

## LIURP Needs Assessments

The Company currently projects there are approximately 81,222 potential LIURP participants in the Met-Ed Rate District with incomes at or below 150% of FPIG. The comparable totals for Penelec, Penn Power and West Penn Rate Districts are 106,971, 23,798 and 117,135, respectively. Details of the Company's Rate Districts needs assessments are shown below, including estimates of potential LIURP participants with incomes 151-200% of FPIG.

FirstEnergy 2024-2028 USECP WARM Needs Assessment - April 2024				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Number of Customers with Incomes at or Below 150% of FPIG</b>	109,057	145,169	34,395	147,770
Usage at or Above 6,000 kWh per Year	92,698	123,394	29,236	125,605
Received WARM in the Last Five Years	4,893	8,248	2,857	4,663
Less than Six Months of Usage History	1,592	2,044	436	1,235
Renters Projected where LL Refused	1,309	1,276	418	647
Projected to Drop Out	3,008	3,881	1,350	1,251
Number of Customers Receiving Services - Act 129	673	973	377	674
Total Potential Participants	81,222	106,971	23,798	117,135
Weighted Average Job Cost for 2023	\$ 4,699.49	\$ 3,535.99	\$ 4,602.47	\$ 6,456.30
Estimated Cost to Serve Potential Participants	\$ 383,226,816.58	\$ 378,247,435.43	\$ 109,529,254.65	\$ 756,256,517.42
Estimated Renters	24,463	60,735	12,614	57,126
<b>Number of Customers with Incomes 151-200% of FPIG</b>	48,355	57,086	14,856	53,779
Usage at or Above 6,000 kWh per Year	41,102	48,523	12,628	45,712
Received WARM in the Last Five Years	1,083	1,030	382	703
Less than Six Months of Usage History	706	804	188	449
Renters Projected where LL Refused	988	1,003	169	199
Projected to Drop Out	683	485	181	189
Total Potential Participants	37,642	45,201	11,707	44,172
Weighted Average Job Cost for 2023	\$ 4,699.49	\$ 3,535.99	\$ 4,602.47	\$ 6,456.30
Estimated Cost to Serve Potential Participants	\$ 176,895,713.14	\$ 159,833,553.05	\$ 53,882,914.97	\$ 285,189,022.19
Estimated Renters	11,735	19,052	5,105	17,582

Funding and Enrollment Goals<sup>12</sup>

Met-Ed		
Year	Budget	Participant Goals
2024	\$ 10,408,580	1,505
2025	\$ 11,010,038	1,505
2026	\$ 11,647,123	1,505
2027	\$ 12,321,963	1,505
2028	\$ 13,036,810	1,505

Penelec		
Year	Budget	Participant Goals
2024	\$7,890,000	1,735
2025	\$8,345,680	1,735
2026	\$8,828,346	1,735
2027	\$9,339,611	1,735
2028	\$9,881,183	1,735

Penn Power		
Year	Budget	Participant Goals
2024	\$3,466,000	600
2025	\$3,535,760	600
2026	\$3,606,635	600
2027	\$3,678,768	600
2028	\$3,752,343	600

West Penn Power		
Year	Budget	Participant Goals
2024	\$ 11,151,400	1,300
2025	\$ 11,803,428	1,300
2026	\$ 12,494,237	1,300
2027	\$ 13,226,146	1,300
2028	\$ 14,001,614	1,300

<sup>12</sup> The WARM budgets are based on projected WARM enrollment levels for the 2024 through 2028 program years. However, where a budget is overestimated in the USECP for one program year, the Company will roll over this excess budget amount from one program year to the next consistent with the Company's last base rate settlement. *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016- 2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R- 2016-2537359 (Opinion and Order entered Jan. 19, 2017).

In general, the average cost of serving WARM participants' homes has increased over the years due to measure price increases, particularly since the beginning of the COVID-19 pandemic. Also, seasonal load reduction measures continue to be installed in homes using electric space heaters in lieu of fossil fuel heaters. Homes that previously were classified as water heat or baseload jobs that received lighting, refrigerator replacements and water heat reduction measures require attic air sealing, insulation, and combustion safety tests in many cases. Due to the increased complexity of the measures, it also takes additional time to serve these homes, which prevents agencies and contractors from serving the same number of homes under prior plans. The Company continues to stress with contractors that they need to overcome barriers to the installation of measures wherever possible.

Participant goals are also consistent with the Company's experience in a post-COVID-19 world where contractors continue to struggle to maintain adequate staffing levels. Additionally, the Company is struggling to find enough customers willing to participate in WARM in certain areas of their service territory, particularly Penn Power. Holding participant goals at the levels proposed will allow spending per home to gradually increase over the plan's term. The Company proposes that any unspent funds from the current plan period be carried over into the new plan period as reserve funds.

## Summary of Proposed Program Additions and Modifications

### PCAP

All changes approved by the Commission for the 2024-2028 plan will be effective after the relevant IT changes are made. The previously approved plan will remain effective until such IT changes are adopted. The following program modifications are included in this plan for PCAP as compared to the Company's current USECP approved on July 11, 2019:

1. PCAP will be converted from a fixed credit program to a percentage-of-income payment program, which does not involve the equal payment plan or a minimum energy burden. The participant will be billed a percentage-of-income payment or the actual charges, whichever is less. Percentage-of-income payments are based on federal poverty level, heat type, and income as defined in the 2019 Amended CAP Policy Statement.
2. The Company will continue utilizing the Commission-approved zero-income form modified for completion telephonically.
3. The Company is introducing a customer education and outreach plan.
4. The Company affirmatively acknowledges that it accepts income documentation of 30 days or 12 months, whichever is more beneficial and representative of their true annual income
5. The Company proposes that income documentation will not be required during application or recertification when the customer is known to be a LIHEAP recipient within the last 12 months from the date of the application. Income information will be obtained verbally to complete the application.
6. New subsidy limits applicable to all FE PA service territories will be based on the number of credits projected to serve 80% of PCAP participants. Participants will be notified when 50% or 80% of the subsidy limit has been exhausted. Participants will be advised how to request an exception to the subsidy limit if they are eligible.
7. Recertification periods will be modified to align with the CAP Policy Statement based on income source.
8. Automatic recertification will occur for PCAP participants that authorize DHS to share the household and income data from the LIHEAP application with the Company.
9. LIHEAP recipients enrolled on PCAP will not have the recertification date extended one year when a LIHEAP grant has posted.
10. Outreach to encourage enrollment will be sent to customers that are not on PCAP but authorized DHS to share the household and income data from the LIHEAP application with the Company.
11. Income documents will not be required to apply for PCAP if the LIHEAP recipient authorized DHS to share the household and income data from the LIHEAP application with the Company.
12. The suspension period will be eliminated as part of the recertification process.
13. The debt forgiveness period will be changed from 36 months to 12 months.
14. Remove dismissal due to a minimum energy burden requirement (aka graduated).
15. The requirement to participate in the EPP has been eliminated.
16. Retroactive credits will be provided to participants removed from PCAP due to failure to participate in the WARM.
17. PCAP will be transferred to a new account when the customer moves from one rate district to another. Penn Power customers must request the transfer. PCAP will transfer automatically for Met-Ed, Penelec and West Penn if eligible.

## **WARM**

The following program modifications are included in this plan for WARM:

1. If customers participate in PCAP, they will be required to receive an in-home energy evaluation and work with a trained energy educator to create an energy-savings plan. Failure to do so may result in the customer being removed from PCAP. Customers who are removed from PCAP that later decide to participate in WARM within 12 months will have the PCAP subsidy and/or forgiveness credits applied retroactively.
2. The Company plans to increase efforts to reach customers who are eligible to receive program services by expanding the use of digital communications, outbound dialing campaigns, and social media to help identify and provide services to customers in need. The Company also plans to update materials used in outreach efforts.
3. The minimum annual usage requirement for WARM participation will be reduced from 6,500 kWh to 6,000 kWh.

## **Applied Technologies in Support of Universal Service Programs**

The Company employs various technologies to promote an efficient delivery of their USECP. Some of the more significant technologies are described below:

### **C-Net On-line Help System**

C-Net On-Line Help System is a Microsoft Office application called SharePoint. C-Net provides the Company's Customer Care Centers and the Human Services department employees with detailed on-line information on federal and state programs and the Company's USECP.

### **SAP**

SAP is the Company's host computer system containing the customer master file.

### **Human Services Web Site**

The Human Services web site allows CBOs to easily obtain current customer billing, payment, energy use and other information while evaluating customers' energy assistance applications without Customer Contact Center or Human Services involvement. Entry to the site is password protected.

### **LEEN System**

The LEEN system is a web-based system used to assist inspectors, contractors, and the Company's administrators in their management of the WARM program. This system replaced the WARM system. Some features include:

- Streamlined security role structure
- SAP integration for application entry and job status
- Enhanced job assignment process
- Enhanced job status reports for quality assurance staff and program managers
- Invoice management process
- Work queues functionality

- Required fields to support the documentation and reporting of coordinated jobs

### **Application Intake System**

The Company developed a new web-based application system for PCAP and WARM applications in 2023. This system replaced the Chronicles application. The system provides an administrator with the ability to take applications by phone or mail, as well as providing customers with a tool for self-service. The application will provide document storage, historical records, and limited SAP integration. The system provides automated updates to customers as the application moves through the workflow process. The Company eliminated requesting social security numbers as part of the application process. Customers will be asked to provide their account number instead.

## Universal Service Eligibility Criteria

### PCAP

- Total gross household income is at or below 150% of FPIG. Proof of household income can be for either the past 30 days or 12 months, whichever is most beneficial and representative of their true annual income.
  - The Company requires households reporting zero income to complete a zero-income form. The Commission-approved form was modified for completion by phone. It requires the household to explain how certain household expenses are met to identify countable income.
- The account is an active residential account.
- Applicant/customer must reside at the service address (primary residence). A residency exception will be made for ratepayers assigned to active military duty.
- Participants may only have one residential account (primary residence) on PCAP at any given time. Multiple account exceptions will be made for customers living at premises with multiple electric meters when they are occupying the entire premises or when customers move from one service location to another and have temporary concurrent service – one month maximum.
- Accounts may be eligible for monthly PCAP credits and/or debt forgiveness credits:
  - To qualify for debt forgiveness credits, the customer must have an account balance at initial enrollment. At re-enrollment, only the customer's remaining unpaid preprogram arrearage is subject to forgiveness credits, unless the amount originally set aside is \$300 or less.
  - To qualify for a monthly PCAP credit, the monthly percentage-of-income payment must be less than the actual charges for that month.
  - Participants are not required to receive one or both credits to be on PCAP.

### WARM

- Total gross household income is at or below 150% FPIG; up to twenty percent of the budget is used for customers with special needs at 151%-200% FPIG.
- The customer must reside at a service address and have six months of consecutive electric service.
- The customer must provide proof of home ownership.
- A minimum annual use of 6,000 kWh is required; 0 kWh for homes coordinated with state or gas weatherization.
- Homes may receive services again after five years if the annual electric usage meets or exceeds 6,000 kWh.

### Hardship Fund

- Total gross household income must be at or below 250% FPIG.
- The account is for a residential single home or apartment.
- The name on the account must be an adult resident; a residency exception will be made for ratepayers assigned to active military duty.
- The customer must have paid a minimum of \$150 or the equivalent of three PCAP bill amounts, whichever is less, on their account within the past 90 days. If age 62 and over, the customer must have paid a minimum of \$100 or the equivalent of three PCAP bill amounts, whichever is less.
- The account balance must be at least \$100.
  - Customers age 62 and over may have a \$0 balance, but not a credit balance.

- The hardship grant amount, alone or in combination with other funding sources, must be enough to end the termination process or restore service.

Note: Before receiving this grant, customers must first apply for the Pennsylvania Low-Income Home Energy Assistance Program (“LIHEAP”) through the Pennsylvania Department of Human Services, when available, and must first participate in PCAP, when eligible. Additionally, the Company reserves the right to exclude PCAP-eligible customers from receiving a grant, depending on funding levels for the program. Exceptions to the eligibility guidelines will be made on a case-by-case basis.

## **CARES**

To qualify, the customer must be payment-troubled and experiencing a recent hardship, such as serious illness or injury to a member of a household, death of a wage earner, marital or family problems, handicapped or disabled person, sudden loss of income to the household, or any customer 60 years of age or over requiring special assistance.

Universal Service Needs Assessments for Each of FE PA’s Rate Districts

2023 Needs Assessment - Met-Ed						
Based on:						
Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau						
December 2023 Customer Count						
County	Total Households	Households Under 150% Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	40,006	7,343	18.35%	31,016	5,691	
Berks	161,174	39,091	24.25%	130,527	31,653	
Bucks	246,834	30,920	12.53%	5,222	654	
Chester	200,622	26,695	13.31%	1,153	153	
Cumberland	104,053	17,997	17.30%	11,034	1,909	
Dauphin	117,907	28,086	23.82%	5,942	1,415	
Lancaster	208,988	40,800	19.52%	1,996	390	
Lebanon	55,236	12,875	23.31%	54,078	12,606	
Lehigh	142,160	35,093	24.69%	3,790	936	
Monroe	59,113	13,494	22.83%	21,967	5,015	
Montgomery	329,680	45,315	13.75%	11,990	1,649	
Northampton	120,384	24,233	20.13%	60,993	12,278	
Pike	23,780	4,743	19.95%	15,882	3,168	
York	178,543	34,365	19.25%	163,844	31,540	
<b>Total</b>	<b>1,988,480</b>	<b>361,050</b>	<b>18.16%</b>	<b>519,434</b>	<b>109,057</b>	<b>20.995%</b>

## 2023 Needs Assessment - Penelec

Based on:

Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau

## December 2023 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Armstrong	27,767	6,764	24.36%	98	24	
Bedford	19,571	5,341	27.29%	10,001	2,729	
Blair	50,587	13,918	27.51%	48,477	13,336	
Bradford	24,361	6,824	28.01%	19,525	5,469	
Cambria	55,541	16,318	29.38%	54,400	15,983	
Centre	58,285	17,691	30.35%	4,438	1,347	
Clarion	14,808	4,578	30.92%	4,914	1,519	
Clearfield	31,741	8,864	27.93%	29,689	8,292	
Crawford	33,191	10,328	31.12%	22,134	6,888	
Cumberland	104,053	17,997	17.30%	5,297	916	
Erie	109,474	33,375	30.49%	106,706	32,535	
Forest	1,844	700	37.96%	3,455	1,312	
Franklin	62,576	13,976	22.33%	5,124	1,144	
Huntington	15,771	4,091	25.94%	11,479	2,978	
Indiana	32,285	9,728	30.13%	22,541	6,792	
Jefferson	18,018	5,549	30.80%	14,090	4,340	
Juniata	8,852	2,269	25.63%	720	185	
Lycoming	45,705	12,186	26.66%	723	193	
McKean	15,931	4,977	31.24%	13,977	4,366	
Mifflin	18,612	6,718	36.09%	19,447	7,018	
Perry	18,066	3,601	19.93%	981	196	
Potter	6,595	2,069	31.37%	2,486	780	
Somerset	28,956	7,610	26.28%	26,541	6,975	
Sullivan	2,462	615	24.98%	2,894	723	
Susquehanna	15,641	4,013	25.66%	11,766	3,019	
Tioga	16,583	4,523	27.27%	13,944	3,803	
Venango	21,323	6,362	29.84%	18,397	5,490	
Warren	16,209	4,440	27.39%	14,729	4,034	
Wayne	19,747	4,928	24.96%	3,116	778	
Westmoreland	153,237	31,629	20.64%	1,975	408	
Wyoming	10,788	2,442	22.64%	7,053	1,597	
<b>Total</b>	<b>1,058,580</b>	<b>274,424</b>	<b>25.92%</b>	<b>501,117</b>	<b>145,169</b>	<b>28.969%</b>

<b>2023 Needs Assessment - Penn Power</b>						
Based on:						
Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau						
December 2023 Customer Count						
<b>County</b>	<b>Total Households</b>	<b>Households Under 150% of Poverty</b>	<b>Percent of Households Under 150% of Poverty</b>	<b>Res. Cust.</b>	<b>Estimated Residential Customers &lt;150% of Poverty</b>	<b>Estimated Res. Cust. &lt;150% of Poverty % to Total</b>
Allegheny	545,637	121,529	22.27%	20,696	4,609	
Beaver	71,999	15,859	22.03%	11,753	2,589	
Butler	79,466	14,430	18.16%	32,128	5,834	
Crawford	33,191	10,328	31.12%	6,350	1,976	
Lawrence	35,933	10,399	28.94%	33,472	9,687	
Mercer	45,890	12,250	26.69%	45,513	12,147	
Venango	21,323	6,362	29.84%	21	6	
<b>Total</b>	<b>833,439</b>	<b>191,157</b>	<b>22.94%</b>	<b>149,933</b>	<b>34,395</b>	<b>22.940%</b>

**2023 Needs Assessment - West Penn Power**

Based on:

Source: 2018-2022 American Community Survey 5-Year Estimates - United States Census Bureau

December 2023 Customer Count

County	Total Households	Households Under 150% of Poverty	Percent of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % to Total
Adams	40,006	7,343	18.35%	1,615	296	
Allegheny	545,637	121,529	22.27%	71,960	16,025	
Armstrong	27,767	6,764	24.36%	29,414	7,165	
Bedford	19,571	5,341	27.29%	4,099	1,119	
Blair	50,587	13,918	27.51%	17	5	
Butler	79,466	14,430	18.16%	44,845	8,144	
Cameron	2,210	810	36.65%	3,444	1,262	
Centre	58,285	17,691	30.35%	55,780	16,929	
Clarion	14,808	4,578	30.92%	8,793	2,719	
Clinton	14,877	4,339	29.17%	2,614	763	
Elk	13,485	3,234	23.98%	16,157	3,874	
Fayette	54,937	16,601	30.22%	60,352	18,238	
Franklin	62,576	13,976	22.33%	49,360	11,022	
Fulton	6,126	1,437	23.46%	5,245	1,230	
Greene	13,957	3,411	24.44%	15,837	3,871	
Huntingdon	15,771	4,091	25.94%	1	0	
Indiana	32,285	9,728	30.13%	1,335	402	
Jefferson	18,018	5,549	30.80%	43	13	
Lycoming	45,705	12,186	26.66%	492	131	
McKean	15,931	4,977	31.24%	4,343	1,357	
Potter	6,595	2,069	31.37%	2,538	796	
Somerset	28,956	7,610	26.28%	240	63	
Washington	87,200	17,671	20.26%	94,968	19,241	
Westmoreland	153,237	31,629	20.64%	160,392	33,105	
<b>Total</b>	<b>1,407,993</b>	<b>330,912</b>	<b>23.50%</b>	<b>633,884</b>	<b>147,770</b>	<b>23.312%</b>

### Universal Service Participant and Budget Projections for Each of FE PA's Rate Districts

<b>Met Ed Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	16,232	18,160	18,803	19,467	20,156
Administration	3,281,139	1,769,273	1,831,163	1,895,183	1,961,557
Bill Subsidy	20,712,450	23,172,628	23,993,113	24,840,394	25,719,576
Debt Forgiveness	8,557,729	5,579,964	4,597,302	4,273,023	4,166,011
Total PCAP	32,551,318	30,521,866	30,421,577	31,008,600	31,847,144
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,505	1,505	1,505	1,505	1,505
Total WARM	10,408,580	11,010,038	11,647,123	12,321,963	13,321,963
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	818	818	818	818	818
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	5,500	5,500	5,500	5,500	5,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Met-Ed</b>	<b>43,042,398</b>	<b>41,614,404</b>	<b>42,151,200</b>	<b>43,413,063</b>	<b>45,251,607</b>

<b>Penelec Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	21,991	24,604	25,201	25,812	26,438
Administration	3,746,838	2,499,730	2,608,726	2,647,511	2,686,863
Bill Subsidy	23,223,752	25,983,229	26,613,695	27,258,946	27,920,038
Debt Forgiveness	8,330,361	5,590,444	4,686,272	4,387,895	4,289,431
Total PCAP	35,300,950	34,073,403	33,908,693	34,294,352	34,896,332
<b>WARM (LIURP)</b>					
Projected WARM Participants	1,735	1,735	1,735	1,735	1,735
Total WARM	7,890,000	8,345,680	8,828,346	9,339,611	9,881,183
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	550	550	550	550	550
Total Dollar Energy Fund	75,000	75,000	75,000	75,000	75,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total Penelec</b>	<b>43,271,450</b>	<b>42,499,633</b>	<b>42,817,589</b>	<b>43,714,513</b>	<b>44,858,065</b>

<b>Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	5,022	5,618	5,768	5,922	6,081
Administration	907,440	698,031	730,489	741,137	751,888
Bill Subsidy	5,454,119	6,101,402	6,264,309	6,431,560	6,604,241
Debt Forgiveness	1,658,154	1,127,018	951,744	893,903	874,816
Total PCAP	8,019,712	7,926,451	7,946,541	8,066,600	8,230,945
<b>WARM (LIURP)</b>					
Projected WARM Participants	600	600	600	600	600
Total WARM	3,466,000	3,535,760	3,606,635	3,678,768	3,752,343
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	257	257	257	257	257
Total Dollar Energy Fund	35,000	35,000	35,000	35,000	35,000
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	1,000	1,000	1,000	1,000	1,000
<b>Gatekeeper</b>					
Total Gatekeeper	1,000	1,000	1,000	1,000	1,000
<b>Total Penn Power</b>	<b>11,522,712</b>	<b>11,499,211</b>	<b>11,590,176</b>	<b>11,782,368</b>	<b>12,020,288</b>

<b>West Penn Power Projected Budgets</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>PCAP</b>					
Projected PCAP Participants	18,526	20,727	21,357	22,007	22,676
Administration	3,525,060	2,314,767	2,337,782	2,360,903	2,384,341
Bill Subsidy	20,294,461	22,705,564	23,395,703	24,107,751	24,840,613
Debt Forgiveness	8,413,564	6,010,239	5,217,141	4,955,419	4,869,051
Total PCAP	32,233,085	31,030,570	30,950,627	31,424,074	32,094,004
<b>WARM (LIURP)</b>					
Projected WARM Participants	1300	1300	1300	1300	1300
Total WARM	11,151,400	11,803,428	12,494,237	13,226,146	14,001,614
<b>Dollar Energy Fund Administration</b>					
Projected DEF Hardship Participants	810	810	810	810	810
Total Dollar Energy Fund	46,500	46,500	46,500	46,500	46,500
<b>CARES</b>					
Projected CARES participants	50	50	50	50	50
Total CARES	3,500	3,500	3,500	3,500	3,500
<b>Gatekeeper</b>					
Total Gatekeeper	2,000	2,000	2,000	2,000	2,000
<b>Total West Penn Power</b>	<b>43,436,485</b>	<b>42,885,998</b>	<b>43,496,864</b>	<b>44,702,220</b>	<b>46,147,618</b>

The PCAP budgets are based on projected PCAP enrollment levels for 2024 through 2028 program years and the estimated average expense per year-end participant. The Company attempts to consider plan changes and past trends during similar events when estimating expenses or participation. The budgets may be adjusted each year based on actual data to minimize over and under-collections from customers.

## Conclusion

The Company submits its Universal Service and Energy Conservation Program is consistent with all applicable Commission requirements, including the following:

- 52 Pa. Code § 56.1, *et seq.* (Standards and Billing Practices for Residential Utility Service)
- 66 Pa. C.S. § 1401, *et seq.* (Responsible Utility Customer Protection Act)
- 52 Pa. Code §§ 54.71-54.78 (Reporting Requirements for Universal Service and Energy Conservation Programs)
- 52 Pa. Code §§ 58.1-58.18 (regarding LIURP)
- PCAP Policy Statement of July 25, 1992, Docket No. M-00920345
- 66 Pa. C.S. §§ 2801, *et seq.* (Electricity Generation Customer Choice and Competition Act)
- Commission Universal Service and Energy Conservation Programs Guidelines, Docket No. M-00960890F0010 (Order entered Jul. 10, 1997)
- Commission Universal Service and Energy Conservation Program Reporting Requirements, Docket No. L-00970130 (Order entered Apr. 30, 1998)
- Customer Assistance Programs: Funding Levels and Cost Recovery Mechanisms, Docket No. M-00051923 (Order entered Dec. 18, 2006)
- Cost recovery of USECP costs via the Company's Universal Service Cost Riders as approved by the Commission's Orders at Docket Nos. R-00061366, R-00061367, R-00072437, and R-2014-2428742
- *Pa. Pub. Util. Comm'n v. Met-Ed*, Docket No. R-2016-2537349; *Pa Pub. Util Comm'n v. Penelec*, Docket No. R-2016-2537352; *Pa. Pub. Util. Comm'n v. Penn Power*, Docket No. R-2016-2537355; and *Pa. Pub. Util. Comm'n v. West Penn*, Docket No. R-2016-2537359 (Opinion and Order entered Jan. 19, 2017)
- *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience*, Docket Nos. A-2023-3038771, *et al.* (Order entered December 7, 2023)
- *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Involuntary Remote Disconnect Procedures*; Docket Nos. P-2019-3013979, *et al.* (Order entered July 3, 2023)

- *2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs*; Docket No. M-2023-3038944 (Order entered June 13, 2024).

## Company Contacts

Inquiries regarding this report should be directed to:

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Fairmont, West Virginia 26554  
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## Attachment A - Community-Based Organizations (CBO)

- ACTION-Housing Inc. 1-800-841-6899
- CLEARresult 1-800-367-7223
- Community Action Committee of the Lehigh Valley 1-866-847-4565
- Community Action Partnership of Mercer County 1-888-508-5216
- Center for Community Action 1-800-323-9997
- Central PA Community Action, Inc. 1-814-765-1551
- C. Driscoll Positive Energy Consulting 1-724-984-4147
- Dollar Energy Fund 1-888-282-6816
- Erie County Housing Authority 1-800-841-6899
- Harron's Home Center 1-877-274-6276
- Healthy Homes 1-724-662-3591
- Hranec Insulation Corporation 1-724-363-0092
- Mincin Insulation 1-412-461-0160
- MT Weatherization 717-525-9665
- Northern Tier Community Action Corporation 1-814-486-1161
- Northwest PA Weatherization 1-814-425-1872
- SEDA-Council of Governments 1-570-524-4491
- Solaire Energy, Inc. 1-800-518-8911
- South Central Community Action Programs 1-800-451-8969
- Tableland Services, Inc. 1-814-445-9628
- TEAZ, Inc. 1-724-366-6753
- True Management, LLC 1-484-866-8011
- Warren Forest Counties Economic Opportunity Council 1-800-231-1797
- Weatherization, Inc. 1-877-984-7462
- York Home Performance 717-586-8584

## Attachment B – PA Consolidation Settlement Relevant Terms

On December 7, 2023, the Commission approved the PA Consolidation settlement agreement which contained a number of provisions that affect the administration of FE PA's USECP. *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company* ("Joint Petition"), Docket Nos. A-2023-3038771, et al. (Order entered December 7, 2023). Provisions applicable to FE PA's low-income programs are listed below. To the extent a settlement term directly impacts language within the USECP, those changes are also reflected within the plan in addition to being listed below.

The applicable provisions include:

- Maintaining current staffing levels for FE PA's universal service programs for the duration of its Proposed 2024 USECP, excluding retirements and voluntary separations. Joint Petition at p. 11, ¶40.
- Hosting its USAC on a quarterly basis through each calendar year and presenting any proposed changes or amendments to program design or administration before advancing to a formal proposal, implementing changes, and discussing issues and questions that occur in its service territories related to consolidation or its universal service programs. Joint Petition at pp. 11-12, ¶41.
- Sharing program data with USAC members in advance of each USAC meeting to help facilitate informed discussions; including program participant data, spending levels, and other relevant program metrics as settled on by the parties for each USECP. Joint Petition at p. 12, ¶42.
- Providing a platform for open dialogue and feedback regarding programming at USAC meetings. Cost allocation to other ratepayer classes will not be discussed. Joint Petition at p. 12, ¶43.
- Increasing the diversity and range of community voices in the USAC through recruitment of additional members such as local housing providers, food assistance providers, weatherization and home repair providers, community health clinics, domestic violence agencies, immigrant and refugee resettlement organizations, and other local community-based organizations serving low-income individuals and communities within FE PA's service territory. Joint Petition at p. 12, ¶44.
- Providing an update on FE PA's seamless transition of PCAP enrollment between rate districts to its USAC as a standing agenda item until full implementation is complete. Joint Petition at p. 13, ¶45.
- Making contributions of \$150,000 annually to FE PA's Hardship Fund, incremental to the current matching contribution, for a period of three years after Commission approval of the transaction; and contributions of \$100,000 annually to the Hardship Fund, incremental to the current matching contribution, for the following two years. Any unspent funding from the annual contributions will be rolled over to be used for Hardship funding for the subsequent program year. Joint Petition at p. 13, ¶46.
- Implementing required modifications to its information technology system and processes, within a reasonable time frame not to exceed one year, to automatically recertify an existing PCAP participant's income and eligibility. Use best efforts to implement manual processing to recertify LIHEAP recipients for PCAP purposes until the required system changes have been made. Identify and deem all LIHEAP recipients from the data exchange as confirmed low-income customers eligible for winter shutoff protections. Commit to conducting outreach to all LIHEAP recipients identified in the data exchange that are not current PCAP participants to encourage program enrollment. Joint Petition at pp. 13-14, ¶47.

## Attachment C - Reporting Requirements

The following reporting requirements were outlined in the 2024 USECP:

For the duration of this USECP, FE PA will implement the following steps if its actual annual PCAP costs exceed the annual projected costs, as identified in its 2024 USECP, by more than 20%:

- Notify the Commission and all parties to the 2024 USECP proceeding and its USAC by or before April 1 and provide actual annual PCAP cost information for the preceding year.
- Schedule a meeting (virtual or in-person) with all interested stakeholders within 30 days of this notification to discuss the costs and receive input on cost controls.
- File and serve a petition at the 2024 USECP docket proposing additional cost control measures or a letter justifying why no additional cost control measures are needed within 30 days of the stakeholder meeting.

FE PA will track the amount of LIHEAP dollars issued to CAP customers that are returned to DHS each year and the reasons why these funds are returned. FE PA will track this information, share and discuss this information annually with its USAC, and report annual unused LIHEAP dollars refunded for CAP accounts from 2024 through 2030 as part of its proposed 2031-2035 USECP.

FE PA is to file and serve a report at these dockets by April 1 each year where actual PPA forgiveness costs for a 12-month PPA forgiveness in the previous calendar year exceeded the estimates provided in Attachment B of its Supplemental Information by 20% or higher. This report should provide an explanation for the increase in PPA costs and updated projections for the remainder of the USECP years based on 12, 24, and 36 months of PPA forgiveness.

Evaluate the reasons customers fail to recertify for PCAP and its impact on customer payments, disconnections, and arrearages.

Track and report for each rate district how many PCAP customers exceed these subsidy credit limits and whether certain subsets of customers (*i.e.*, based on income or account type) are particularly impacted. This reporting must also include by rate district:

- How many of these customers received termination notices and how many thereafter had service terminated.
- How many of these customers were granted exceptions to the subsidy credit limits and the basis for exemption.
- How many of these customers participated in WARM.
- How many of these customers did not participate in WARM and the reasons why not, if known.

Accordingly, based on the new subsidy credit limits, FE PA shall file and serve an annual report on April 1 of each year at its USECP dockets beginning in 2026 for the duration of its 2024 USECP on the number of PCAP customers reaching or exceeding their subsidy credit limits, broken down by account type (*i.e.*, ENH and EH) and FPIG income tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%).

Also, beginning in 2025 and for the duration of its 2024 USECP, FE PA shall file and serve, by March 1 at these dockets, annual updates to its CEOP which include outreach and education actions taken.

FE PA's existing 2019 USECP will continue in operation in whole or in part until replacement provisions of the Revised 2024 USECP are implemented. A third-party independent evaluation of FE PA's universal service programs is due on November 1, 2028.

FE PA's 2024 USECP shall be in effect until its next USECP is approved and implemented. FE PA's next proposed USECP shall be due on or before November 1, 2029, and shall include enrollment and budget projections for five years starting January 1, 2031 (*i.e.*, 2031-2035).

FE PA shall revise the WARM landlord agreement form to include language consistent with the provisions of 52 Pa. Code § 58.8(a) and clarify that tenants are eligible to receive baseload measures without landlord consent. The company shall file and serve a copy of the revised landlord agreement form at these dockets within three months from the entry date of this Order.

FE PA shall file and serve a copy of the amended WARM Program Application at these dockets within six months of the entry date of this Order.

FE PA shall file and serve an updated WARM needs assessment on March 2, 2026, at these dockets, consistent with this Order.

FE PA shall file and serve an amendment to its 2024-2028 Universal Service and Energy Conservation Plan reflecting updated universal service budget amounts and the estimated cost recovered from each non-PCAP customer monthly when all four rate districts are merged.

## Attachment D - Revised Outreach Materials

Please note that the letters for enrollment and notice to recertify are subject to modification as the Company advances through the implementation of the PCAP revisions. The letters are the same for all rate districts.

### PCAP Recertification Letter – 60-days notice

Account Number:

Service Address:

Dear

It is time for you to recertify with Met-Ed's Pennsylvania Customer Assistance Program (PCAP). The recertification is required by 11/30/2019 to continue receiving your benefits. If you are removed from the program, your full account balance will become due. If your recertification is already in progress, please continue with your application. If not, please re-apply online at [pabillassist.com](http://pabillassist.com), or contact Dollar Energy Fund at 888-282-6816.

During the enrollment period, you received the following PCAP benefits:

- Monthly credits in total of \$2,670.00 which lowered your monthly payment responsibility
- Forgiveness credit in total of \$0.00 which lowered your balance set aside at the time of enrollment

Also, if confirmed income eligible for PCAP, you will continue to not be charged a security deposit or late payment fees.

To recertify, you may be asked to provide all household members' names, dates of birth and proof of income for adults. Proof of income can be for either the past 30 days or 12 months, whichever is more beneficial and representative of your true annual income.

For potential WARM benefits, such as an in-home energy usage evaluation or energy-saving home improvements at no cost to you, please have your landlord's name and phone number available if renting.

Also, when you complete a LIHEAP application, you may choose to allow the Department of Human Services to share your application information with the utility that will receive the LIHEAP grant. If your grant is directed to your electric account, your account can be recertified automatically for PCAP. Contact your County Assistance Office or call the DHS Helpline for more information at 800-692-7462 (800-451-5886 TDD for individuals with hearing impairments).

Sincerely,

Met-Ed, A FirstEnergy Company

Por favor comuníquese con Dollar Energy Fund al 888-282-6816 para recertificar su hogar y calificación de ingresos para el Programa de Asistencia al Cliente de Pennsylvania (PCAP). Si usted es removido(a) del programa, el saldo total de su cuenta de electricidad será adeudado y los beneficios PCAP que reducen el monto de su cuenta finalizarán. Dollar Energy de esta disponible de lunes a viernes de 8 a.m. a 5 p.m.

## PCAP Recertification Letter – 30-days notice (3-page letter)

Account Number:

Service Address:

Dear |

It is time for you to recertify with Met-Ed's Pennsylvania Customer Assistance Program (PCAP). The recertification is required by 06/01/2021 to continue receiving your benefits. If you are removed from the program, your full account balance will become due. **If your recertification is already in progress, please continue with your application.** If not, you may recertify online at [pabillassist.com](http://pabillassist.com), call Dollar Energy Fund, or complete and return the enclosed recertification form. Dollar Energy Fund may attempt to contact you by text message as a convenient way for you to complete some or all of the recertification process. Message and data rates may apply. You may choose to opt out of the text message process by replying "STOP".

During the enrollment period, you received the following PCAP benefits:

- Monthly credits in total of \$544.98 which lowered your monthly payment responsibility
- Forgiveness credits in total of \$0.00 which lowered your balance set aside at the time of enrollment.

Also, if confirmed income eligible for PCAP, you will continue to not be charged a security deposit or late payment fees.

To recertify, you may be asked to provide all household members' names, dates of birth and proof of income for adults. Proof of income can be for either the past 30 days or 12 months, whichever is more beneficial and representative of your true annual income.

For potential WARM benefits, such as an in-home energy usage evaluation or energy-saving home improvements at no cost to you, please have your landlord's name and phone number available if renting.

Also, when you complete a LIHEAP application, you may choose to allow the Department of Human Services to share your application information with the utility that will receive the LIHEAP grant. If your grant is directed to your electric account, your account can be recertified automatically for PCAP. Contact your County Assistance Office or call the DHS Helpline for more information at 800-692-7462 (800-451-5886 TDD for individuals with hearing impairments).

Sincerely,

Met-Ed, A FirstEnergy Company

Por favor comuníquese con Dollar Energy Fund al 888-282-6816 para recertificar su hogar y calificación de ingresos para el Programa de Asistencia al Cliente de Pennsylvania (PCAP). Si usted es removido(a) del programa, el saldo total de su cuenta de electricidad será adeudado y los beneficios PCAP que reducen el monto de su cuenta finalizarán. Dollar Energy de está disponible de lunes a viernes de 8 a.m. a 5 p.m.

Pennsylvania Customer Assistance Program (PCAP) Recertification Form

Apply online at [pabillassist.com](http://pabillassist.com) If you haven't registered for an online account with FirstEnergy, you will be directed to complete registration. Please note if you have already applied, you do not need to complete a new application.

1. Applicant Information:

Is your electric service terminated?		Yes	No	Do you have a termination notice?		Yes	No
Electric Account Number:		Name on Electric Account:		Name of Applicant:			
Home Phone Number:		Cell Phone Number:		Email:			
Service Address:				Who is head of household?			

Circle all that apply:

To help us identify additional assistance programs which may be available to you, please circle all that you have applied for since October 1:							
LIHEAP	CRISIS	Dollar Energy Fund	Other	None			
Type of housing:	Single Home	Row	Semi	Townhouse	Mobile Home	Apartment	Other
Ownership Status:	Own	Rent	Other				
If renting, the landlord's permission is required before home improvements can be made through the WARM program. Please list your landlord's name, address and/or phone number:							
Do you have electric hot water heating?		Yes	No	Do you pay for heating?		Yes	No
How is your residence mainly heated?				If heating with gas, who is your provider?			
Electric	Gas	Oil	Propane	Wood	Other		

2. Household Information:

Complete this section for each person living in your home including ratepayer or yourself. Attach additional sheets if needed.

Name	Birthdate	Relationship to Applicant	Income for last 30 days*	Type of Income (See next page for list)

\*Income documents may be submitted for the last 30 days or 12 months, whichever is more beneficial and representative of your true annual income. Income is neither counted nor requested for household members under 18 years of age.

Other Income: This section is required if Other income type is listed in Household Information.

How often do you receive?	Annual	Bimonthly	Every Other Week	Monthly	Weekly
Is this a temporary source of income?	Yes	No			
How long do you expect this income source to exist?	30 Days	60 Days	90 Days	Greater than 90 Days	

Zero Income: This section is required if total amount of household income is zero (\$0) in Household Information.

I confirm/state that no adult member of my household is currently receiving income from any source.

Identify how you and your household meet monthly living expenses, such as expenses for housing (mortgage or rent), food, electric (electric, gas, water, and/or phone). Check all that apply, at least 1 option must be selected:

Using money from savings       Financial support from friends/family/community       Other

## Acceptable Types of Income Documentation

Types of Income	Acceptable Proof
Black Lung Benefits	Statement from Coal Mine Workers' Compensation of expected benefit
Employment - Salary or Wages	Pay stubs to cover last 30-day period, letter from employer
Military Pay	Copy of Military pay receipt or copy of direct deposit statement
Other	Income not listed on the Types of Income form. Please complete the Other Income questions on section #2 on the application.
Pension	Copy of pension check with attached stub indicating gross income, Letter from Pension Board, 1099 tax form, or bank statement
Public Assistance - Department of Public Welfare (TANF)	Benefits Letter from current year or Printout of benefits received from Department of Human Services
Rental Income	Tenant Lease(s), Notarized Statement - Must include the amount the tenant is required to pay each month for rent, or rent receipts
Retirement Savings	401k, 403b, IRA, and Annuities - copy of 1099 tax form required Roth IRA - copy of form 5498 from bank
Royalties	Monthly royalty statement, Copy of royalty check (last 30 days), Bank statement (last 30 days), Other income form (last resort)
Self-Employment	Current Tax Return Documentation - Form 1040 & associated Schedule (C, K, SE, S, etc.), Quarterly statement from accountant, or 1099 tax form
Short Term or Long Term Disability	Letter of determination, Copy of disability check, or bank statement
Social Security - Retirement, Disability, Supplemental Security Income (SSI), (Adults)	Copy of letter from Social Security Administration, benefit statement from current year, 1099 tax form, or bank statement - To obtain a copy of a benefit letter, visit <a href="http://ssa.gov/myaccount">ssa.gov/myaccount</a> or call 1-800-772-1213.
Spousal support	Court order (only if receiving amount ordered), Domestic relations printout (last 30 days), <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days), <a href="http://www.GoProgram.com">www.GoProgram.com</a> bank statement (last 30 days), Passthrough Welfare Benefits statement from welfare (both sides), Voluntary child support of spousal support - Use other income form
Unemployment Compensation	Statement from Unemployment Compensation of expected benefit from current year, unemployment printout, or bank statement
Utility Allowance/Check	Copy of utility check, If reimbursed on a card, printout from the card (last 30 days), Document from housing that lists the utility reimbursement
Veterans' Benefits	Copy of letter from Veterans Administration, benefit statement from current year, or bank statement - Visit <a href="http://va.gov/records/download-va-letters">va.gov/records/download-va-letters</a> or call 1-800-827-1000.
Workers' Compensation	Statement from Workers' Compensation of expected benefit, letter of determination, copy of check, or bank statement
Zero Income	No income. Please complete the Zero Income section under #2 on the application.

## 3. Acknowledgement and Consent

I agree that the facts set forth in my PCAP application are true and complete to the best of my knowledge. FirstEnergy reserves the right to further verify application information if necessary. I understand and accept that false or incomplete statements will be cause for rejecting my application or removing me from the program.

I allow FirstEnergy and the Dollar Energy Fund to release and exchange relevant information with other agencies or utilities in order to make appropriate referrals to services that may assist me in lowering my energy bill or help me to better afford my energy costs.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Check the following before mailing:

- Review Sections 1-3 to ensure your application is signed and completed.
- Include acceptable income documentation for all adults listed in Household Information. Write your account number on each document submitted.
- Mail or fax your completed application and acceptable income documentation to:  
Dollar Energy Fund  
P.O. Box 42329  
Pittsburgh, PA 15203  
Fax: 412-515-1661

For questions about your PCAP application, contact Dollar Energy Fund at 888-282-6816 Monday through Friday from 8 a.m. to 5 p.m.

## Enrollment Letter (two-page letter)

Account Number:

Dear West Penn Power Customer,

Welcome to West Penn Power's Pennsylvania Customer Assistance Program (PCAP)! Based on your application, your PCAP credit is \$58.40 and will be subtracted from your monthly bill amount. The amount of the credit can change each month based on your usage.

If eligible, your account balance has been set aside for forgiveness credits. If this is not your first time enrolling in PCAP and your initial program balance was more than \$300, you will only be eligible for forgiveness credits for the portion of the balance that was originally set aside and has not been paid. The remainder of your balance will be due on your first PCAP bill. A message will show on your bill if you are eligible for the forgiveness credit.

With program enrollment, a security deposit is not required for your electric account. If you have already paid a security deposit, it will be refunded to you. Additionally, you will not be required to pay late payment fees while enrolled in the program.

Recertification of income and household information is a requirement to remain on PCAP. If your account is removed from PCAP, the remaining amount of what was set aside will become due immediately.

You will be notified by phone and/or mail when it is time to recertify. You may recertify using [pabillassist.com](http://pabillassist.com) or calling Dollar Energy Fund. Dollar Energy Fund may attempt to contact you by text message as a convenient way for you to complete some or all of the recertification process. Message and data rates may apply. You may choose to opt out of the text message process by replying "STOP". If you receive a LIHEAP grant for your electric account, you may choose on your application to allow the Department of Human Services (DHS) to share your household and income information with us so your account can be recertified for PCAP automatically without a new application.

**Important Notice:** The Pennsylvania Public Utility Commission approved changes to the Pennsylvania Customer Assistance Program (PCAP) to address energy affordability in the Commonwealth. Penelec will implement a revised PCAP program in December 2024. To prepare for the upcoming changes:

- Your account will not be eligible for the Equal Payment Plan while in PCAP. This means your monthly bill amounts will vary.
- During this brief period your account will be protected from disconnection.
- With the new PCAP program, your unpaid energy charges, if any, will be set aside and eligible for forgiveness credits.

We appreciate your patience as we make these transitions for the program. If you have questions about PCAP, please call us at 800-686-0021.

Sincerely,  
West Penn Power, A FirstEnergy Company

Account Number:

Dear

On August 4, 2022, the Pennsylvania Public Utility Commission ordered that effective June 1, 2023, customers enrolled in the West Penn Power Pennsylvania Customer Assistance Program (PCAP) may not receive service from an electric generation supplier and must return to West Penn Power's default service.

Our default service rate is called the Price to Compare (PTC) and is shown on your monthly bill. West Penn Power purchases this power through a competitive bid auction and the PTC rate is then approved by the Commission. The PTC rate changes every 6 months.

If you were receiving service from an electric generation supplier upon PCAP enrollment, your account has been returned to default service. You will be charged at the price-to-compare (PTC) rate effective at that time. The supplier cannot charge fees or penalties for this early termination or cancellation.

If you have questions, please contact us at 800-686-0021, Monday through Friday 8 a.m. to 6 p.m.

Sincerely,

West Penn Power, A FirstEnergy Company

PCAP Paper Application (4 pages)

**Acceptable Types of Income Documentation**

Types of Income	Acceptable Proof
Black Lung Benefits	Statement from Coal Mine Workers' Compensation of expected benefit
Employment - Salary or Wages	Pay stubs to cover last 30-day period, letter from employer
Military Pay	Copy of military pay receipt or copy of direct deposit statement
Pension	Copy of pension check with stub indicating gross income, a letter from pension board, 1099 tax form or bank statement
Public Assistance - Department of Public Welfare (TANF)	Letter of benefits from current year or printout of benefits received from Department of Human Services
Rental Income	Tenant lease(s), notarized statement, including the amount the tenant is required to pay each month for rent or rent receipts
Retirement Savings	401K, 403b, IRA, and Annuities - copy of 1099 tax form required Roth IRA - copy of form 5498 from bank
Royalties	Monthly royalty statement, copy of royalty check (last 30 days), bank statement (last 30 days) or other income form
Self-Employment	Current tax return documentation, including Form 1040 & associated schedule (C, K, SE, S, etc.), quarterly statement from accountant or 1099 tax form
Short Term or Long-Term Disability	Letter of determination, copy of disability check, or bank statement
Social Security - Retirement, Disability, Supplemental Security Income (SSI), (Adults)	Copy of letter from Social Security Administration, benefit statement from current year, 1099 tax form or bank statement To obtain a copy of a benefit letter, visit <a href="http://ssa.gov/myaccount">ssa.gov/myaccount</a> or call 1-800-772-1213
Spousal Support	Court order (only if receiving amount ordered) Domestic relations printout (last 30 days) - <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days) <a href="http://www.GoProgram.com">www.GoProgram.com</a> bank statement (last 30 days) Passthrough Welfare Benefits statement from welfare (both sides) Voluntary child support of spousal support - Use other income form
Unemployment Compensation	Statement from Unemployment Compensation of expected benefit from current year, unemployment printout or bank statement
Utility Allowance/Check	Copy of utility check, document from housing listing utility reimbursement; printout from card if reimbursed on card (within the last 30 days)
Veterans' Benefits	Copy of letter from Veterans Administration, benefit statement from current year, or bank statement Visit <a href="http://va.gov/records/download-va-letters">va.gov/records/download-va-letters</a> or call 1-800-827-1000
Workers' Compensation	Statement from Workers' Compensation of expected benefit, letter of determination, copy of check or bank statement
Zero Income	No income. Please complete the 'Zero Income' questions in section 2 of this application.
Other	Income not listed on this form. Please complete the 'Other Income' questions in section 2 of this application.

**Pennsylvania Customer Assistance Program (PCAP) Enrollment Form**

**Apply online at pabillassist.com.** If you haven't registered for an online account with FirstEnergy, you will be directed to create one. If you have already applied, you do not need to complete a new application.

**If your service has been disconnected or you have received a termination notice, please contact your utility. A pending PCAP application does not prevent service termination.**

**Account Number:**

**Name on Account:**

**Service Address:**

**1. Applicant Information:**

Is your electric service terminated?    Yes    No		Do you have a termination notice?    Yes    No	
Name of applicant:			
Home phone number:		Cell phone number:	Email:
To help us identify additional assistance programs which may be available to you, please circle all that you have applied for since October 1: LIHEAP    CRISIS    Dollar Energy Fund    Other    None			
Type of housing:    Single Home    Row    Semi    Townhouse    Mobile Home    Apartment    Other			
Ownership status:    Own    Rent    Other			
If renting, the landlord's permission is required before home improvements can be made through the WARM program. Please list your landlord's name, address and/or phone number:			
Do you have electric hot water heating?    Yes    No			
Do you pay for heating?    Yes    No			
How is your residence mainly heated?    Electric    Gas    Oil    Propane    Wood    Other			
If heating with gas, who is your provider?			

**2. Household Information:** Complete this section for each person living in your home, including the electric account holder or yourself. Attach additional sheets if needed.

Name	Birthdate	Relationship to Applicant	Income for the last 30 days*	Type of Income (See included list) If any member does not have income, enter zero.

\*Income documents may be submitted for the last 30 days or 12 months, whichever is more beneficial and representative of your true annual income. Income is neither counted nor requested for household members under 18.

**Account Number:**

**Name on Account:**

**Other Income:** Complete this section if you included income in the Household Information section qualified as 'Other' by the Types of Income list.

How often do you receive this income?	Annual	Bimonthly	Every Other Week	Monthly	Weekly
Is this a temporary source of income?	Yes	No			
How long do you expect this income source to exist?	30 days	60 days	90 days	Greater than 90 days	

**Zero Income:** Complete this section if the total amount of income is zero (\$0) in the Household Information section of this application.

I confirm/state that no adult member of my household is currently receiving income from any source.

Indicate how you and your household meet monthly living expenses, including housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone). You must select at least one option. Check all that apply.

I am using money from savings

I receive financial support from friends/family/community

Other

**3. Acknowledgement and Consent**

I agree that the facts set forth in my PCAP application are true and complete to the best of my knowledge. FirstEnergy reserves the right to further verify application information if necessary. I understand and accept that false or incomplete statements will be cause for rejecting my application or removing me from the program.

I allow FirstEnergy and the Dollar Energy Fund to release and exchange relevant information with other agencies or utilities in order to make appropriate referrals to services that may assist me in lowering my energy bill or help me to better afford my energy costs.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**PCAP Participants:**

- Must acknowledge this account is for the primary residence of the account holder.
- Must agree to re-enrollment if you were a previous PCAP participant. You will be contacted by Dollar Energy Fund to advise you of the amount due on your first PCAP bill if re-enrolled. If your initial program balance was more than \$300, you will only be eligible for forgiveness credits for the portion of the balance that was originally set aside and has not been paid. The remainder of your balance will be due immediately. You must decide whether to re-enroll after being notified of the estimated amount due on your next PCAP bill.
- Agree to recertify household income eligibility as scheduled or when there is a change in household size, income, or heat source. Notifications to complete recertification begin approximately 60 days before the scheduled end date of the program. You may apply online at [pabillassist.com](http://pabillassist.com), call Dollar Energy Fund or complete the paper application that will be mailed. LIHEAP applicants may choose to share their LIHEAP application data with us on the LIHEAP application to help with program enrollment or recertification. FirstEnergy will automatically recertify PCAP customers that share this LIHEAP application data with us.
- Agree to apply for the Low Income Home Energy Assistance Program (LIHEAP), if eligible.
- Agree to participate in the WARM program, if eligible.
- Cannot be on an installment plan while enrolled in PCAP. Being removed from an installment plan may cause a larger balance to be due on the first PCAP bill.
- Cannot participate in Equal Payment Plan billing.
- Cannot receive service from an electric generation supplier. Suppliers cannot charge a PCAP participant any additional fees. This includes early termination and cancellation fees.
- Must pay PCAP bills in full to receive program benefits and avoid service termination.
- Cannot be billed on a PCAP account for products and services, such as the Meter Surge Arrestor program, Line Protection Program, AC, Furnace, and Electrical program, Tree Trimming and Landscape Lighting program.
- May be billed on a separate account for outdoor lighting.

**Check the following before mailing:**

- **Review sections 1-3 to ensure your application is signed and completed.**
- **Include acceptable income documentation for all adults under the Household Information section of this application. Please write your account number on each document.**
- **Mail or fax your completed application and acceptable income documentation to:  
Dollar Energy Fund P.O Box 42329 Pittsburgh, PA 15203 or fax to 412-515-1661**

**For questions about your PCAP application, contact Dollar Energy Fund at 888-282-6816 Monday through Friday from 8 a.m. to 5 p.m.**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

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

Service by electronic mail only as follows:

Christy Appleby, Esq.  
Darryl A. Lawrence, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[CAppleby@paoca.org](mailto:CAppleby@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)

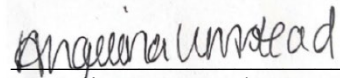
NazArah Sabree  
Small Business Advocate of Pennsylvania  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

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Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[PULP@pautilitylawproject.org](mailto:PULP@pautilitylawproject.org)

Dated: October 7, 2024



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FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
[aumstead@firstenergycorp.com](mailto:aumstead@firstenergycorp.com)