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**PREPARED DIRECT TESTIMONY OF HARRY S. GELLER, ESQ.**

1       **I. INTRODUCTION**

2       **Q: Please state your name, occupation, and business address.**

3       A: My name is Harry S. Geller. I retired as Executive Director of the Pennsylvania Utility  
4       Law Project (PULP) and maintain attorney emeritus status. I maintain an office at 118 Locust St.,  
5       Harrisburg, PA 17101, for the purpose of providing consulting services and assistance to low  
6       income individuals and the organizations which represent them in utility and energy matters.

7       **Q: Briefly outline your education and professional background.**

8       A: I received my B.A. degree from Harpur College, State University of New York at  
9       Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in  
10       1969. Upon graduation from law school, I worked at several organizations dedicated to serving  
11       low income households. Beginning 1988, I served as the Executive Director of PULP, a statewide  
12       legal aid project dedicated to protecting the rights of low income utility customers. At PULP, I  
13       represented low income individuals to resolve issues impacting their ability to maintain energy  
14       and utility services to their homes and supported organizations advocating for improved utility  
15       access and affordability. I also consulted and co-counseled on a wide variety of individual utility  
16       consumer cases, and participated in multiple task forces, work groups and advisory panels,  
17       including serving as chair of the Department of Human Services' LIHEAP Advisory Committee  
18       and the Pennsylvania Public Utility Commission's Consumer Advisory Committee. I frequently  
19       trained communities, legal aid staff, and advocacy groups across Pennsylvania on a range of utility  
20       and energy matters affecting Pennsylvania's low income population. I retired from PULP on June  
21       30, 2015. Since that time, I have continued to provide consulting services for PULP and its clients,  
22       as well as other organizations serving the low income community. In sum, I have over 50 years'

1 experience working on behalf of households in poverty, including the past 30 years focusing  
2 specifically on utility and energy issues affecting low income consumers. My resume is attached  
3 as Appendix A.

4 **Q: Please describe the focus of your work over the past fifty years, including relevant**  
5 **work experience on issues of low income families' ability to afford essential services such as**  
6 **utilities?**

7 A: Through the entirety of my career, I have represented low income individuals and  
8 organizations serving low income populations in a wide variety of legal matters, including family  
9 law, public benefits, unemployment compensation, utility shut-offs, debtor/creditor, and housing-  
10 related disputes. Over the past 30 years, my focus has been to ensure that low income households  
11 can connect to, afford, and maintain utility and energy services.

12 In all these legal matters, I worked almost exclusively on behalf of individuals and  
13 households that subsist on incomes at or below 150% of the Federal Poverty Level (FPL). Through  
14 this work, I have had a close view of the daily lives of countless of our poorest citizens. I have  
15 spent thousands of hours assisting clients, combing through their budgets to see whether it is even  
16 possible to make ends meet. Over the years, I have consistently seen the near total absence of the  
17 ability of low income families to afford the most basic monthly necessities with the incomes they  
18 have, even assuming heroic self-control and conscientious budgeting and spending. Every month,  
19 my clients faced the stark reality of having to choose which bills they can forgo with the least  
20 drastic consequences.

1 **Q: Have you testified in any proceedings before the Pennsylvania PUC?**

2 A: Yes. I have presented testimony in many proceedings before the PUC. I have included a  
3 complete list in my resume, which I have attached as Appendix A.

4 **Q. For whom are you testifying in this proceeding?**

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

7 **Q: What is the purpose of your testimony?**

8 A: CAUSE-PA intervened in this proceeding to ensure that the proposed rate increase, rate  
9 design, and tariff changes will not adversely affect the ability of low income customers of  
10 FirstEnergy Pennsylvania Electric Company (FE PA, FirstEnergy, or the Company) to connect to,  
11 maintain, and afford electric service, which is essential for heating, cooking, and hot water – all  
12 critical components to a safe and healthy home.

13 In furtherance of these stated intentions for intervention, the purpose of my testimony is to  
14 assess FE PA’s existing and proposed rates, tariff, rules, procedures, and programs to determine  
15 whether they are just, reasonable, and appropriately designed to ensure that low income  
16 Pennsylvanians within FE PA’s service territory are able to equitably access and maintain safe and  
17 affordable utility services.

18 **Q: How is your testimony organized?**

19 A: Following this introductory section, my testimony is divided into 8 substantive sections  
20 and one section summarizing my proposals and recommendations:

21 In Section II, I discuss FE PA’s proposed residential rate increase.

22 In Section III, I will provide an overview of FE PA’s low income customer base and the  
23 disproportionate level of energy insecurity faced by low income Pennsylvanians residing in FE

1 PA's service territory. I will discuss how FE PA's existing and proposed rates pose a disparate  
2 financial hardship on low income customers, and I will outline extensive data that these households  
3 face substantially higher rates of payment trouble and involuntary termination. As I conclude,  
4 based on overwhelming data, it is critical that FE PA make substantial reforms to its policies,  
5 programs, and procedures to correct these stark disparities in access to home energy services.

6 In Section IV, I will discuss FE PA's proposed rate design, and how its proposal will  
7 negatively impact the ability of low income customers to reduce their bill through efficiency and  
8 conservation.

9 In Section V, I will discuss FE PA's improper and unsupported proposal to recover tens of  
10 millions of dollars in expenses related to speculative legislative reforms to Chapter 14 of the Public  
11 Utility Code. As I'll discuss, FE PA provides no rational basis for this claim.

12 In Section VI, I will discuss FE PA's Universal Service and Energy Conservation  
13 Programs. I will provide recommendations designed to address pervasive unaffordability at  
14 existing rates and to help offset the further impact of any approved rates as a result of this  
15 proceeding. I will discuss ways that FE PA can improve enrollment in assistance programs and,  
16 in turn, improve access to just and reasonable rates for FE PA's low income customers.

17 In Section VII, I will discuss several customer service issues that negatively impact FE  
18 PA's low income customers. I will first address issues related to FE PA's customer notices, the  
19 consumer protections discussed in these notices, and how inadequacies in FE PA's notices affect  
20 residential customers' ability to stay connected to services. I will also discuss issues with FE PA's  
21 security deposits, and the timely release of improperly held security deposits for confirmed low  
22 income customers. Finally, I will respond to FE PA's proposal to reduce its reconnection fee.

1 In Section VIII, I will respond to FE PA’s proposal to implement a transportation  
2 electrification program.

3 Finally, in Section IX, I will summarize the recommendations made throughout this direct  
4 testimony.

5 **II. RATE INCREASE PROPOSAL**

6 **Q: Please summarize FE PA’s requested rate increase as it applies to residential**  
7 **customers.**

8 A: On April 2, 2024, FE PA submitted a rate filing, Supplement No. 3 to FE PA’s Tariff  
9 Electric – Pa. P.U.C. No. 1 (“Supplement No. 3”), seeking a general rate increase of approximately  
10 \$502 million, or 34%, over existing revenues across all FE PA Rate Districts based on data for a  
11 fully projected future test year ending December 31, 2025. On a Rate District basis, FE PA has  
12 proposed rates allegedly designed to increase the following annual distribution revenues:<sup>1</sup>

- 13 • Met-Ed Rate District: \$146 million (31%)
- 14 • Penelec Rate District: \$132 million (28%)
- 15 • Penn Power Rate District: \$55 million (43%)
- 16 • West Penn Rate District: \$169 million (40%)

17 If FE PA’s proposed rate increases are approved in their entirety, the monthly bill of a  
18 typical FE PA residential customer receiving default service and using 1,000 kilowatt-hours (kWh)  
19 per month would increase as follows by Rate District:<sup>2</sup>

- 20 • Met-Ed Rate District: \$187.70 to \$205.00 (9.22%)
- 21 • Penelec Rate District: \$200.96 to \$220.75 (9.85%)
- 22 • Penn Power Rate District: \$180.59 to \$201.88 (11.79%)
- 23 • West Penn Power Rate District: \$156.36 to \$172.98 (10.63%)

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<sup>1</sup> Statement of Reasons at 1-2.

<sup>2</sup> Id.

1 **Q: Do you support the Company's requested rate increase?**

2 A: No, I do not support FE PA's requested rate increase, as it is neither just nor reasonable,  
3 and is not in the public interest. FE PA's current rates are already categorically unaffordable for  
4 low income families, making service inaccessible to thousands of households and, in turn, creating  
5 a cascade of consequences for the household and the surrounding community. As I will discuss,  
6 there are foundational issues in the design and administration of FE PA's universal service  
7 programs that are deepening pronounced disparities in access to service for low income families  
8 across FE PA's service territory and in each of its Rate Districts. Further increasing rates will only  
9 exacerbate this existing problem.

10 As a foundational principle, I do not believe that rates are just and reasonable if they are  
11 not affordable for all residential households within FE PA's service territory – regardless of  
12 income – to maintain safe and affordable electricity to their home. As I will discuss, the data shows  
13 quite clearly that a staggering number of low income families are unable to afford to maintain  
14 service to their home at current rates, that FE PA's universal service programs are not adequate to  
15 ensure universal accessibility at existing rates, and that any further rate increase will serve to  
16 exacerbate deep energy insecurity across FE PA's broad service territory. It would be unjust and  
17 unreasonable to approve any rate increase at this time, absent substantial additional mitigation  
18 measures to reform FE PA's policies, programs, and procedures to address existing rate  
19 unaffordability and to fully remediate additional unaffordability created by any approved rate  
20 increase.

21 Throughout my testimony, I offer recommendations for how FE PA can structure its  
22 services so that low income customers are better able to maintain access to electric services to their  
23 homes. These recommendations are critical to address service access issues regardless of whether

1 rates increase, but it is even more vital to mitigate additional financial harm for economically  
2 vulnerable consumers if the Commission allows FE PA to increase its rates.

3 **III. RATE IMPACT ON LOW INCOME CUSTOMERS**

4 **Q: How many customers in FE PA’s service territory are considered low income?**

5 A: That is a difficult question to answer with specificity. However, there are a number of  
6 metrics available to help measure poverty levels in FE PA’s service territory and contextualize the  
7 scale of energy insecurity across FE PA’s Rate Districts.<sup>3</sup>

8 Pennsylvania’s large public utilities track and classify low income customer populations in  
9 two primary ways: estimated low income (ELI) customers and confirmed low income (CLI)  
10 customers.<sup>4</sup> To be considered low income, a household must have income at or below 150% of the  
11 federal poverty level (FPL).<sup>5</sup> For context, a family of four with household income at or below  
12 150% FPL has a maximum gross annual income of \$46,800 (\$3,900/month) – while a household  
13 of four with income at or below 50% FPL has a maximum gross annual income of just \$15,600.<sup>6</sup>

14 FE PA calculates its ELI customer count based on its residential customer count,  
15 proportionate to federal poverty data from the U.S. Census Bureau’s American Community

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<sup>3</sup> Energy insecurity is the inability to adequately meet home energy needs. There are three dimensions to energy insecurity: economic (disproportionately high energy costs (burden) as percentage of income); physical (housing deficiencies / inefficiencies); and coping (strategies to cope with economic and physical hardships associated with energy insecurity). See Columbia Univ. Ctr. on Global Energy Policy, Energy Insecurity in the United States, [https://www.energypolicy.columbia.edu/publications/energy-insecurity-in-the-united-states/#:~:text=Energy%20insecurity%20\(ELI\)is%20defined,Physical](https://www.energypolicy.columbia.edu/publications/energy-insecurity-in-the-united-states/#:~:text=Energy%20insecurity%20(ELI)is%20defined,Physical).

<sup>4</sup> See Pa. PUC, BCS, 2022 Report on Universal Service Programs & Collections Performance, at 2,4 (Sep. 2023) (herein 2022 Universal Service Report).

<sup>5</sup> See US Dept. of Health & Human Services, HHS Poverty Guidelines for 2024, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

<sup>6</sup> Id.

1 Survey.<sup>7</sup> As of December 2023, FE reports the following number of ELI customers across each  
2 division:

3 **Table 1: Estimated Low Income (ELI) Customer Count (Dec. 2023)<sup>8</sup>**

<b>Division</b>	<b>ELI Customers</b>	<b>Residential Customers</b>	<b>% of Residential Customers</b>
<b>Met-Ed</b>	109,115	519,719	20.99%
<b>Penelec</b>	145,179	501,154	28.97%
<b>Penn Power</b>	34,400	149,958	22.94%
<b>WPP</b>	147,803	634,023	23.31%
<b>Total</b>	436,497	1,804,854	24.18%

4  
5 In total, FE PA reports 436,497 ELI customers as of December 2023, comprising approximately  
6 24% of all FE PA residential customers (436,497 out of 1,804,854).<sup>9</sup>

7 The Company also tracks confirmed low income customers (CLI).<sup>10</sup> Section 54.72 of the  
8 Commission’s regulations define “*confirmed low-income residential customer account*” as  
9 “[a]ccounts where the EDC has obtained information that would reasonably place the customer in  
10 a low-income designation.”<sup>11</sup> The Commission has explained that this definition may include  
11 participation in a universal service program, receipt of LIHEAP grant, self-certification, or receipt  
12 of an income-based payment arrangement.

13 FE PA maintains two different internal definitions for the term CLI customers, each of  
14 which are more narrow and in some ways conflict with the Commission’s definition of the term.<sup>12</sup>

15 For regulatory reporting requirements, FE PA classifies confirmed low income customers  
16 if they (1) are enrolled in PCAP, (2) receive assistance through the Low Income Home Energy

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<sup>7</sup> CAUSE-PA I-15, Attachment A and B.

<sup>8</sup> CAUSE-PA I-15, Attachment A and B. CAUSE-PA I-8, Attachment A.

<sup>9</sup> CAUSE-PA I-8, Attachment A. CAUSE-PA I-15, Attachment A and B.

<sup>10</sup> CAUSE-PA I-4.

<sup>11</sup> 52 Pa. Code § 54.72.

<sup>12</sup> See 52 Pa. Code §54.72.

1 Assistance Program (LIHEAP) program, or (3) are on an income-based payment arrangement.<sup>13</sup>  
2 In 2022, FE PA began removing the “confirmed low income” designation from customer accounts  
3 if they have not affirmatively verified income with FE PA within the prior 24 months.<sup>14</sup>

4 In contrast, when applying the statutory and regulatory prohibition on collecting security  
5 deposits from low income households, FE PA applies an even narrower definition of confirmed  
6 low income customers.<sup>15</sup> For this purpose, FE PA defines confirmed low income customers to  
7 include only those who are enrolled in PCAP or have received a LIHEAP grant designated to FE  
8 PA.<sup>16</sup> As I’ll discuss further in Section VII, I am concerned FE PA’s security deposit collection  
9 policies stemming from this narrow definition are not compliant with Commission standards.

10 As of December 2023, FE PA classified the following confirmed low income customers:

11 **Table 2: FE PA CLI Customers, Commission Reporting (Dec. 2023)<sup>17</sup>**

<b>Division</b>	<b>CLI</b>	<b>Residential Customers</b>	<b>% CLI</b>
<b>Met-Ed</b>	61,907	519,719	11.91%
<b>Penelec</b>	76,644	501,154	15.29%
<b>Penn Power</b>	16,862	149,958	11.24%
<b>WPP</b>	68,405	634,023	10.79%
<b>Total</b>	223,818	1,804,854	12.40%

12  
13 FE PA’s narrow, conflicting, and short-term definition of confirmed low income customers  
14 results in substantial and chronic undercounting of FE PA’s low income customer base, and  
15 detrimentally impacts the ability of its low income customers to access important protections -  
16 including the statutory prohibition on low income security deposits.<sup>18</sup> It also makes it more

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<sup>13</sup> CAUSE-PA I-4.

<sup>14</sup> 2022 Universal Service Report at 3.

<sup>15</sup> CAUSE-PA I-4.

<sup>16</sup> Id.

<sup>17</sup> OCA I-1, Attachment L. CAUSE-PA I-5. CAUSE-PA I-8, Attachment A.

<sup>18</sup> 52 Pa Code § 56.32(e).

1 difficult to analyze the adequacy of FE PA’ universal service program performance and as  
2 compared with other jurisdictional electric utilities.

3 For the purposes of evaluating the actual number of low income customers in FE PA’s  
4 service territory, the ELI count presents a more accurate and reliable picture of FE PA’s low  
5 income consumers. While both metrics show that a substantial number of FE PA customers are  
6 low income, the CLI customer count provides only a limited assessment of the low income  
7 population – counting only the number of customers who have recently provided verified  
8 documentation of their income to the Company or the Pennsylvania Department of Human  
9 Services (DHS).

10 Nevertheless, while FE PA’s ELI customer count is a more accurate measure of FE PA’s  
11 low income customer base, both measures demonstrate that a substantial percentage of FE PA  
12 customers have income at or below 150%.<sup>19</sup>

13 **Q: Above, you noted that the Commission defines a low income customer as having a**  
14 **gross annual income at or below 150% of the Federal Poverty Level (FPL). Please explain.**

15 A: Generally, the Commission considers a “low income” customer to be any customer whose  
16 income is at or below 150% of the federal poverty level (FPL).<sup>20</sup> With some exceptions, most  
17 utility assistance programs – including FE PA’s PCAP – require households to have income that  
18 is not greater than 150% FPL to qualify for bill discounts and/or arrearage forgiveness, and no  
19 greater than 250% FPL to qualify for grant assistance.<sup>21</sup>

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<sup>19</sup> See 52 Pa. Code § 54.75(x) (“The total number of low-income households. EDCs may estimate this number using census data or other information the EDC finds appropriate.”).

<sup>20</sup> See 52 Pa. Code § 54.72 (Defining low income customers for the purposes of electric and natural gas Universal Service programs and reporting).

<sup>21</sup> 2019 USECP at 6; 2024 USECP at 7.

1           The FPL is a measure of poverty based exclusively on the size of the household, but not  
 2 on the composition of the household (i.e. whether the household consists of adults or children, and  
 3 the relative associated costs) or a household’s geography. As a baseline, a family of four with  
 4 household income at or below 150% FPL has a maximum gross annual income of \$46,800 – or  
 5 \$3,900 per month – while a family of four with income at or below 50% FPL has a maximum  
 6 gross annual income of just \$15,600.<sup>22</sup> Table 3 shows household income by FPL and household  
 7 size:

8           **Table 3: 2024 Federal Poverty Levels by Household Size and Annual Income**<sup>23</sup>

Household/ Family Size	50%	75%	100%	125%	150%	175%	200%
1	7,530.00	11,295.00	15,060.00	18,825.00	22,590.00	26,355.00	30,120.00
2	10,220.00	15,330.00	20,440.00	25,550.00	30,660.00	35,770.00	40,880.00
3	12,910.00	19,365.00	25,820.00	32,275.00	38,730.00	45,185.00	51,640.00
4	15,600.00	23,400.00	31,200.00	39,000.00	46,800.00	54,600.00	62,400.00

9

10           For comparison, a full time (40 hours/ week) worker making a minimum wage (\$7.25 per  
 11 hour) has a gross annual income of \$15,080, assuming no time off. This is substantially less than  
 12 a household needs to meet their basic expenses in any the counties that FE PA serves.<sup>24</sup>

13           A benchmark often used to assess how much income a household needs to live without  
 14 assistance in Pennsylvania is called the Self-Sufficiency Standard. This is a tool that measures the  
 15 income that a family must earn to meet their basic needs and consists of the combined cost of six  
 16 (6) basic needs – housing, child care, food, health care, transportation, and taxes – without the help

<sup>22</sup> See US Dept. of Health & Human Services, HHS Poverty Guidelines for 2024, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

<sup>23</sup> Id.

<sup>24</sup> Self-Sufficiency Standard, available at: <http://www.selfsufficiencystandard.org/Pennsylvania>.

1 of public subsidies.<sup>25</sup> Unlike the federal poverty level, which does not change based on geographic  
2 location or family composition, the Self-Sufficiency Standard accounts for the varied costs of the  
3 six basic needs in different geographic areas and for differently aged household members.<sup>26</sup> Based  
4 on the 2024 Self Sufficiency Standard, a family of four (consisting of 2 adults and 2 school-aged  
5 children) living in the counties served by FE PA is \$80,696.59. This is approximately \$33,896/year  
6 more than a four-person household with a 150% FPL makes in a given year, leaving these families  
7 with a budget deficit of approximately \$1,227.75 per month.<sup>27</sup> Most of FE PA’s low income  
8 customers do not have income that is anywhere close to the Self Sufficiency standard – or the  
9 Commission’s low income threshold at 150% FPL.

10 The average annual income of customers enrolled in FE PA’s Customer Assistance  
11 Program (PCAP) is just \$15,783 – which equates to roughly 50% FPL for a family of 4.<sup>28</sup> Any  
12 increase in the cost of necessities, including the rates for electric service, will result in increased  
13 unaffordability for low and moderate income households living below the self-sufficiency  
14 standard, and will likely result in the corresponding increase in uncollectible expenses, service  
15 terminations, and associated hardships.

16 **Q: How would FE PA’s proposed rate increase impact low income households?**

17 A: FE PA’s proposed rate increase will have a severe impact on the financial stability of low  
18 income families across its service territory. Low income families already struggle to make ends  
19 meet each month and are forced to make untenable choices between affording utility services and  
20 other basic necessities – such as food, medicine, and housing. Any increase in costs for essential

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<sup>25</sup> See PathWays PA, Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania, available at: <http://www.selfsufficiencystandard.org/Pennsylvania>.

<sup>26</sup> Id.

<sup>27</sup> See id. (2024 Pennsylvania Data Set).

<sup>28</sup> CAUSE-PA I-11. FE PA was unable to calculate average annual income of its confirmed low income customers as a whole. CAUSE-PA I-10.

1 services, like electricity, will severely impact low income households' ability to afford these  
2 necessities.

3 To help contextualize the impact of the proposed rate increase on low income households,  
4 it is helpful to look at the relative energy burden of low income households. To be affordable, a  
5 household's total housing costs – *including utility costs* – should account for no more than 30% of  
6 a household's total income.<sup>29</sup> According to formal Commission policy, to be considered  
7 affordable, a household's *combined* energy burden (electric and gas) should not exceed 6% of  
8 household income for those with incomes between 0-50% FPL, or 10% of household income for  
9 those with income between 51-150% FPL.<sup>30</sup> But across Pennsylvania, and in FE PA's service  
10 territory, households with income at or below 150% FPL spend as much as 29% of their income  
11 on energy costs alone.<sup>31</sup> By comparison, the Bureau of Consumer Services (BCS) estimates that  
12 the energy burden of Pennsylvania's residential customers as a whole (exclusive of those enrolled  
13 in a Customer Assistance Program (CAP)) is roughly 4%.<sup>32</sup> Increasing rates will further exacerbate  
14 existing disparities in energy burden for low income households across FE PA's service territory.

15 Energy insecurity resulting from high energy burdens impacts roughly 1 in 4 Pennsylvania  
16 households. According to the United States Census Bureau's Household Pulse Survey, roughly  
17 26% of Pennsylvania households were unable to afford their home energy bills in 2023, compared

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<sup>29</sup> US Dep't of Housing & Urban Development, Defining Housing Affordability, available at:  
<https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-081417.html>.

<sup>30</sup> Id.; 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order, Docket No. M-2019-3012599, (Final Policy Statement entered Nov. 5, 2019).

<sup>31</sup> See CAUSE-PA Exhibit 1; see also Fisher, Sheehan & Colton, The Home Energy Affordability Gap: Pennsylvania (April 2022).

<sup>32</sup> Energy Affordability for Low income Customers, Docket No. M-2017-2587711, Order, at 8 (Jan. 17, 2019); see also Diana Hernandez, Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change, 103(4) Am. J. Pub. Health (2013) available at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

1 to 23% nationwide.<sup>33</sup> Energy insecurity has a profound impact on families – causing many to  
2 forego food, medicine, and other basic necessities in order to maintain energy services to their  
3 home. According to the Energy Information Administration (EIA) Residential Energy  
4 Consumption Survey (RECS) released in 2022, 27.2% of United States residents reported  
5 experiencing energy insecurity; 19.9% reported reducing or forgoing food or medicine to pay for  
6 energy costs; and 10% reported leaving their homes at unhealthy temperatures because they could  
7 not afford to pay for energy.<sup>34</sup> Importantly, energy insecurity is more pronounced for low income  
8 Black families. EIA’s RECS data revealed that 52% of Black and African American households  
9 experience energy insecurity, compared to 23.2% of white households – and nearly 40.2% of Black  
10 and African American households report foregoing food or medicine to pay energy costs,  
11 compared to 16.8% of white households.<sup>35</sup> These disparities are driven in large part by inequities  
12 in housing quality and, in turn, home efficiency.

13 When examining energy insecurity amongst low income households specifically, the data  
14 is even more striking. According to a recent study of the National Energy Directors Association  
15 and the Center for Energy Poverty and Climate, in February 2024, 51.9% of households with  
16 income under \$50,000 reported at least one month where they reduced or went without food,  
17 medicine, and other basic needs in order to pay an energy bill.<sup>36</sup> In addition, 34% kept their home  
18 at a temperature that felt unsafe or unhealthy in order to save money on energy bills.<sup>37</sup> The data

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<sup>33</sup> US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (April 9-29 2024), available at: [https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s\\_state=00042](https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042).

<sup>34</sup> United States Energy Information Administration, 2020 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2020 available at: <https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%2011.1.pdf>.

<sup>35</sup> Id.

<sup>36</sup> Nat’l Energy Assistance Dir. Assoc. (NEADA), Center for Energy Poverty & Climate, Energy Hardship Report (April 2024), available at: <https://neada.org/wp-content/uploads/2024/04/neadahardshipreportAPR24.pdf>.

<sup>37</sup> Id.

1 reviewed in the study found that, far and away, the greatest increase in energy insecurity last year  
2 was among households with children.

3 CAUSE-PA Exhibit 1 provides a snapshot of the applicable FE PA energy burdens for 2  
4 and 4-person households at 50, 100, 150, and 200% FPL, and at various usage levels ranging  
5 between 600 and 1400 kWh per month.<sup>38</sup> As the Exhibit demonstrates, FE PA’s low income  
6 customers face substantial energy burdens at existing rates. These already high burden levels will  
7 increase an additional 1-2% for most households with income at or below the poverty level, though  
8 the increase in relative energy burden will be even more severe for smaller families and those with  
9 high usage.

10 The significant energy burdens shouldered by FE PA’s low income customers – at existing  
11 and proposed rates – leave families with insufficient funds to pay for housing, water costs, food,  
12 medicine, childcare, and other basic needs and pose significant obstacles for low income families  
13 to afford their monthly bills and stay connected to essential energy services in their homes. The  
14 inability to afford service, in turn, creates a cascade of consequences to the health, safety, and  
15 stability of Pennsylvania’s economically vulnerable families – at a substantial cost to individuals,  
16 families, and the communities in which they live and work. If FE PA’s rate increase is approved,  
17 these costly consequences will grow more pronounced and widespread.

---

<sup>38</sup> Note the average monthly residential usage is 1032 kWh. Many families have usage levels higher than this average usage, especially electric heating households and those reliant on de facto electric space heating. OCA I-6, Attachment B.

1 **Q: In addition to high energy burdens, discussed above, is there other evidence that FE**  
 2 **PA’s low income customers are struggling to afford electric services even before any rate**  
 3 **increase is approved?**

4 A: Yes. In addition to facing demonstrably unaffordable energy burdens, FE PA’s low income  
 5 customers carry a disproportionate amount of residential customer debt and are far more likely to  
 6 have their service involuntarily terminated for nonpayment. If FE PA’s proposed rate increase is  
 7 approved, low income customers will experience even greater rate of payment troubles and  
 8 involuntary termination, ultimately increasing the risk of consequences to the health and safety of  
 9 low income customers and their households and the corresponding level of uncollectible expenses  
 10 which are recovered from all ratepayers.

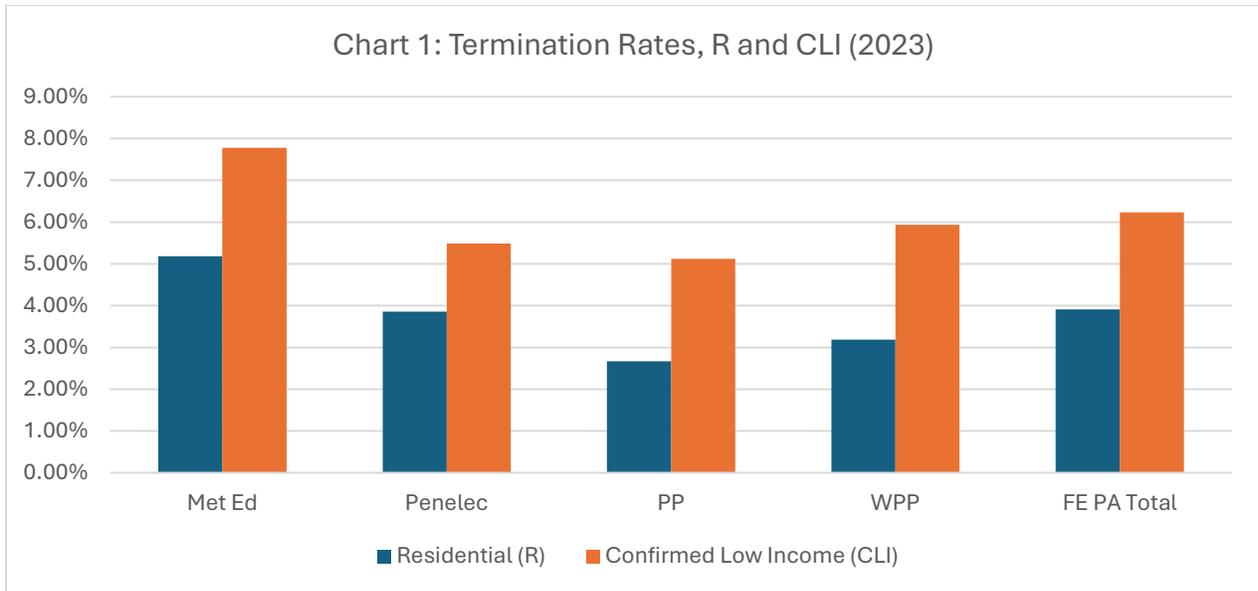
11 First, FE PA’s low income customers have markedly higher rates of termination for  
 12 nonpayment compared to residential customers as a whole:

13 **Table 4: Involuntary Termination Rate, R and CLI (2023)<sup>39</sup>**

	<b>R Terms</b>	<b>R Customers</b>	<b>R Term Rate</b>	<b>CLI Terms</b>	<b>CLI Customers</b>	<b>CLI Term Rate</b>
<b>Met Ed</b>	26,783	517,308	5.18 %	4,687	60,256	7.78%
<b>Penelec</b>	19,362	501,295	3.86 %	4,148	75,536	5.49%
<b>PP</b>	3,988	149,454	2.67 %	860	16,774	5.13%
<b>WPP</b>	20,210	632,675	3.19 %	3,930	66,142	5.94%
<b>FE PA Total</b>	<b>70,343</b>	<b>1,800,732</b>	<b>3.91 %</b>	<b>13,625</b>	<b>218,708</b>	<b>6.23%</b>

14  
 15 As the Table shows, and as further illustrated in the chart below, the termination rate for  
 16 FE PA’s CLI customers is substantially higher than the termination rate for residential customers  
 17 as a whole (which includes CLI customers).

<sup>39</sup> CAUSE-PA I-16 Attachment A and B; CAUSE-PA I-8, Attachment A; OCA, I-1, Attachment L.



1

2 The disparity in termination rates amongst FE PA’s low income customers, compared to residential

3 customers as a whole, underscores the vital need to address rate affordability both at present and

4 proposed rates to ensure that all households are able to access essential home energy services.

5 FE PA’s low income customers also carry substantially higher levels of arrears compared

6 to residential customers as a whole:

7 **Table 5: Arrearage Levels - R, CLI, PCAP (2019-2023)<sup>40</sup>**

Dates	R Avg. Debt <sup>41</sup>	R Total Debt <sup>42</sup>	CLI Avg. Debt <sup>43</sup>	CLI Total Debt <sup>44</sup>	CAP Average Debt	PCAP Total Debt
Dec. 2019	\$314	\$25,573,427	\$635	\$61,897,737	\$563	\$12,471,571
Dec. 2020	\$553	\$50,079,609	\$1,191	\$89,400,187	\$740	\$26,919,738
Dec. 2021	\$513	\$43,842,216	\$1,225	\$68,455,306	\$613	\$22,088,948
Dec. 2022	\$399	\$34,598,743	\$833	\$58,097,067	\$629	\$22,515,750
Dec. 2023	\$417	\$37,097,437	\$829	\$60,713,781	\$643	\$24,121,213

<sup>40</sup> CAUSE-PA I-23, Attachment A.

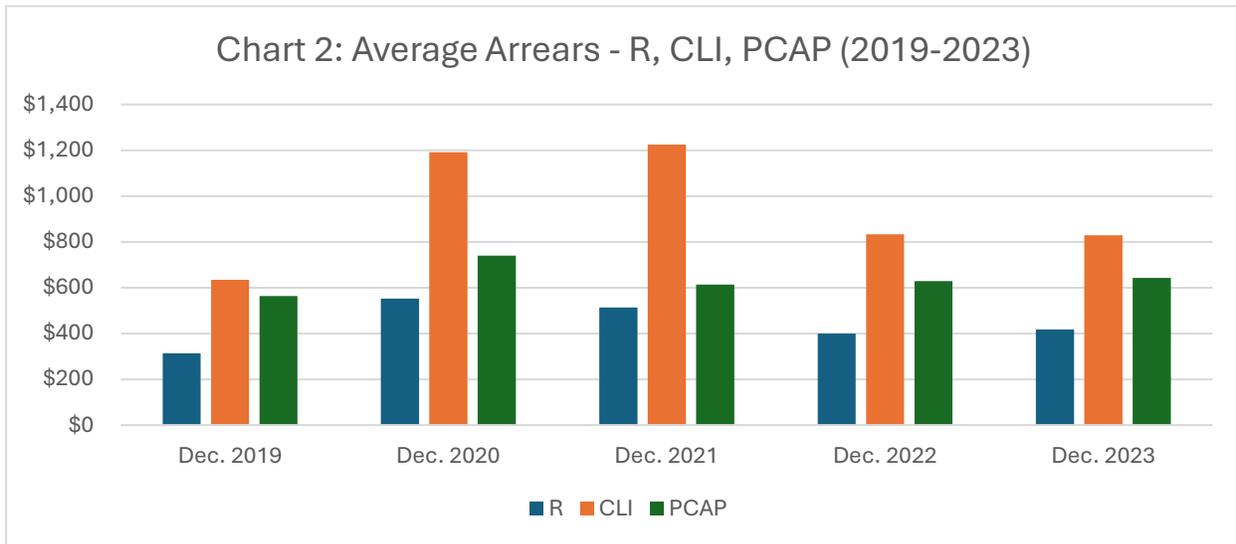
<sup>41</sup> Excludes CLI and CAP customers.

<sup>42</sup> Excludes CLI and CAP customers.

<sup>43</sup> Excludes CAP customers.

<sup>44</sup> Excludes CAP customers.

1 The above Table isolates average and overall arrears carried by Residential customers,  
 2 excluding CLI customers and PCAP participants; CLI customers; and PCAP participants. As of  
 3 December 2023, residential customers (excluding PCAP and CLI customers) had an average debt  
 4 level of \$417 compared to an average debt level of \$829 for confirmed low income customers and  
 5 \$643 for PCAP customers. These disparate levels of average arrears underscore the hardship that  
 6 FE PA’s low income customers face – even at present rates – to afford basic energy service.  
 7 Increasing rates without adequate remediation will further exacerbate unaffordability in monthly  
 8 FE PA bills and the accrual of unmanageable arrears.



9  
 10 As Chart 2 clearly depicts, the average arrears carried by PCAP customers are consistently  
 11 lower than the average arrears carried by confirmed low income customers. This indicates to me  
 12 that current PCAP participants do benefit from enrollment. However, going forward, I am  
 13 concerned that increasing rate unaffordability as a result of this proceeding will cause a greater  
 14 number of PCAP customers to exceed their PCAP maximum credit limits<sup>45</sup> and incur unaffordable

<sup>45</sup> In its recent USECP Order, which is now pending reconsideration, the Commission ordered FE PA to institute tiered maximum CAP credit limits for PCAP customers in its 2024-2028 USECP. FE PA (MetEd, West Penn

1 rates - leading to a higher accrual of arrears and undermining the explicit purpose of the program  
 2 to provide an alternative path to collections. I am advised by Counsel that issues surrounding FE  
 3 PA’s maximum CAP credit limits are pending reconsideration before the Commission in a separate  
 4 proceeding, and may be addressed more thoroughly in Briefing.<sup>46</sup>

5 It similarly appears that FE PA’s confirmed low income customers are reported as payment  
 6 troubled<sup>47</sup> at far greater rates than residential customers as a whole:

7 **Table 6: Payment Troubled Customers – R, CLI (2019-2023)<sup>48</sup>**

	R Payment Troubled	R Customers	R Payment Troubled Rate	CLI Customers Payment Troubled	CLI Customers	CLI Payment Troubled Rate
2019	27,797	1,779,666	1.56%	19,483	259,981	7.49%
2020	16,375	1,783,707	0.92%	10,749	264,696	4.06%
2021	29,735	1,793,489	1.66%	19,638	212,745	9.23%
2022	21,807	1,798,697	1.21%	13,789	205,369	6.71%
2023	23,816	1,800,732	1.32%	15,246	218,708	6.97%

8  
 9 As the above Table indicates, in 2023, 6.97% of confirmed low income customers were reported  
 10 as payment troubled compared to 1.32% of residential customers as a whole (inclusive of  
 11 confirmed low income customers).

12 **Q: How does the involuntary termination of electric service impact a household?**

13 **A:** Involuntary loss of electricity to a home can and does have a deep and lasting impact on  
 14 the health and well-being of an entire household – as well as the community as a whole.

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Power, Penn Power, Penelec) Universal Service and Energy Conservation Plan for 2024-2028, Order, Docket Nos. M-202203036532, -33, -34, -35, at 29 (order entered March 3, 2024, recon. granted pending review Apr. 4, 2024).

<sup>46</sup> Id.

<sup>47</sup> CAUSE-PA I-20. FE PA defines the term “payment troubled” as a customer who has failed to maintain one or more payment arrangements in a 1-year period.

<sup>48</sup> CAUSE-PA I-19, Attachment A; OCA I-1 Attachment L-P. Note that the table utilizes customer counts for R, CLI, and PCAP as of January each year.

1 The overwhelming energy burden on low income households makes it difficult to pay for  
2 other basic necessities, has substantial and long-term impacts on mental and physical health, and  
3 creates serious risks to the household and the larger community.<sup>49</sup>

4 Without electricity, families are exposed to dangerous heat in the summer and dangerous  
5 cold in winter. Extreme heat weather events have increased in frequency and severity in recent  
6 years, driving increased reliance on electricity for home cooling and – in turn – increased cost.<sup>50</sup>

7 Without electricity, households are also unable to use their primary heating source in the  
8 winter, even if that heating source is non-electric, as most modern furnaces rely on electricity to  
9 operate. When a household is unable to use a primary or secondary heating system, they often  
10 resort to dangerous and/or high-cost heating, cooking, and lighting alternatives – such as the use  
11 of alternate fuels or portable generators – which increases the risk of carbon monoxide poisoning  
12 and home fires.

13 The loss of essential utility service is also a common catalyst to homelessness,<sup>51</sup> which  
14 ultimately causes communities to expend an even greater level of resources to adequately address  
15 homelessness and protect the overall safety and well-being of community members. Indeed, a 2016  
16 report of Pennsylvania’s Joint State Government Commission on Homelessness found that utility  
17 assistance ranked in the top three types of assistance noted by survey respondents (24.1 percent)

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<sup>49</sup> See United States Energy Information Administration, 2020 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2020 available at: <https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%2011.1.pdf>; see also NEADA, 2018 National Energy Assistance Survey, at 17, 20 (Dec. 2018), available at: <http://neada.org/wp-content/uploads/2015/03/liheapsurvey2018.pdf> (hereinafter NEADA Survey).

<sup>50</sup> See NEADA, Press Release, As Extreme Heat Rises, Summer Cooling Costs Projected to Increase by Nearly 8% to an Average \$719, Highest in Decades (June 3, 2024), available at: <https://neada.org/wp-content/uploads/2024/06/2024summerpr.pdf>

<sup>51</sup> See Joint State Gov’t Comm’n, Gen. Assembly of the Commw. of Pa., Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>.

1 that would have prevented homelessness.<sup>52</sup> Utility insecurity and resulting payment trouble is  
2 increasingly recognized as a predictor of first-time homelessness,<sup>53</sup> confirming the need to  
3 improve timely access to rate assistance programs to prevent the more costly consequences of  
4 homelessness to individuals, families, and communities.

5 The loss of electric service can also have a significant impact on the ability of vulnerable  
6 populations to manage medical conditions and has shown to worsen health outcomes for  
7 individuals experiencing a range of conditions – increasing hospitalizations and other extreme  
8 consequences, especially for seniors, children, and individuals with a disability.<sup>54</sup>

9 Ultimately, an increase in rates for electric service such as the increase proposed in the  
10 present case will compound existing unaffordability for vulnerable households and is likely to  
11 result in a corresponding increase in uncollectible expenses and involuntary payment-related  
12 terminations. These impacts can and do have deep and lasting impacts on the health, stability, and  
13 well-being of impacted households, and the welfare of communities as a whole.<sup>55</sup> As such, no rate  
14 increase should be permitted without first addressing the current affordability gap for FE PA’s low  
15 income customers.

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<sup>52</sup> Joint State Government Commission, Homelessness in Pennsylvania: Causes, Impacts, and Solutions, at 112, 157, 160 (April 2016), available at: [http://jsg.legis.state.pa.us/publications.cfm?JSPU\\_PUBLN\\_ID=447](http://jsg.legis.state.pa.us/publications.cfm?JSPU_PUBLN_ID=447) (“When asked if there were any services that may have prevented them from becoming homeless, the women responded overwhelmingly that assistance with past-due rent and utilities, security deposit, and first and last months’ rent would have been most beneficial.”).

<sup>53</sup> Colin Middleton, Kim Boynton, David Lewis & Andrew M. Oster, The Value of Utility Payment History in Predicting Homelessness, PLOS (Oct. 9, 2023), available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0292305>.

<sup>54</sup> Eva Siegel et al., Energy Insecurity Indicators Associated with Increased Odds of Respiratory, Mental Health, and Cardiovascular Conditions, J. Health Affairs Vol. 43:2 (Feb. 2024), available at: <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2023.01052>; Charlie Harak, Olivia Wein, NCLC, Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now (Sept. 29 2022), at 5-6, available at: <https://www.nclc.org/resources/report-protecting-seriously-ill-consumers-from-utility-disconnections-what-states-can-do-to-save-lives-now/>.

<sup>55</sup> Id.

1 **Q: Does FE PA’s PCAP mitigate the unaffordability of rates, at both existing and**  
2 **proposed levels?**

3 A: Yes, for some participants, but the extent to which PCAP is capable of mitigating rate  
4 unaffordability for low income customers within FE PA’s service territory is limited by several  
5 factors.

6 **Q: Please explain.**

7 A: PCAP is a critically important affordability program and, as the data above highlights, is  
8 clearly beneficial in reducing low income termination rates and arrearage levels for its participants.  
9 However, large swaths of customers eligible for assistance are not enrolled, limiting the ability of  
10 PCAP to mitigate unaffordability at present and proposed rates. As of December 2023, 81,479  
11 customers were enrolled in PCAP, compared to FE PA’s 223,818 *confirmed* low income  
12 customers.<sup>56</sup> Indeed, more than 100,000 customers that are known to be income-eligible for PCAP  
13 are not enrolled in the program and will bear the full, unmitigated impact of the proposed rate  
14 increase.<sup>57</sup>

15 In its Order dated March 14, 2024 related to FE PA’s proposed 2024 Universal Service and  
16 Energy Conservation Plan (USECP), the Commission approved FE PA’s proposed Percentage of  
17 Income Payment (PIP) PCAP design, subject to certain reporting requirements and the imposition  
18 of tiered maximum CAP credit limits.<sup>58</sup> Pursuant to the proposed 2024 USECP, PCAP customers  
19 would be charged reduced energy burdens, not to exceed 10% of gross household income.<sup>59</sup> PCAP  
20 customers will be asked to pay either a PIP rate or their actual charges each month, if the actual

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<sup>56</sup> CAUSE-PA I-6, Attachment A; OCA I-1, Attachment L.

<sup>57</sup> I note that, in reality, the number of eligible households not enrolled in PCAP is even higher. As discussed above, FE PA’s definition for “confirmed low income customers” is unduly restrictive, and does not provide an accurate accounting of all potentially eligible customers.

<sup>58</sup> 2024 USECP Order at 23.

<sup>59</sup> 2024 USECP at 12.

1 charges are less than the PIP payment.<sup>60</sup> This design will also include a minimum payment  
2 requirement of \$12 for nonelectric heating customers and \$45 for electric heating customers.<sup>61</sup>  
3 However, I am advised by Counsel for CAUSE-PA that the March 14 Order is currently pending  
4 reconsideration of issues regarding the imposition of maximum CAP credit limits, and that FE PA  
5 has not yet implemented this new program design while this narrow issue is pending review.<sup>62</sup>

6 The impact of a rate increase on PCAP customers depends on the PCAP rate that the  
7 participant receives, and when FE PA's PIP is implemented.<sup>63</sup>

8 Assuming FE PA's PIP PCAP design will take effect prior to the effective date of rates in  
9 this proceeding, PCAP customers receiving the actual bill rate option will experience the full  
10 financial impact of any approved rate increase until their CAP rates are adjusted. Once adjusted,  
11 the impact will be limited to their applicable PIP rate, subject to the application of any approved  
12 maximum PCAP credit limit. In turn, PCAP customers who are already receiving the PIP rate will  
13 be initially shielded from the financial impact of any approved rate increase – but only if their total  
14 annual PCAP credit (the difference between the CAP rate and the full residential tariff rate) is less  
15 than any approved maximum PCAP credit limit. If a PCAP customer exhausts their maximum  
16 CAP credits before the end of their 12-month program year, they no longer receive a PCAP rate  
17 that is based on their ability to pay, and will be required to pay the actual rate for the remainder of

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<sup>60</sup> Id.

<sup>61</sup> Id.

<sup>62</sup> CAUSE-PA I-1. See also FE PA (MetEd, West Penn Power, Penn Power, Penelec) Universal Service and Energy Conservation Plan for 2024-2028, Order, Docket Nos. M-2022-3036532, -33, -34, -35, at 29 (order entered March 3, 2024, reconsideration granted pending review April 4, 2024). FE PA filed a letter at its USECP docket on April 18, 2024, advising that it did not intend to file a revised USECP until resolution of the pending Petition for Reconsideration.

<sup>63</sup> CAUSE-PA I-1.

1 the program year - regardless of the fact that actual rate would necessarily exceed the maximum  
2 energy burden standards and, in turn, produce categorically unaffordable rates.

3 The following Table shows the number of FE PA PCAP customers whose bills would be  
4 calculated utilizing actual, PIP, and minimum bill PCAP rates at FE PA's proposed residential  
5 rate, assuming implementation of the approved PIP PCAP design prior to the effective date of  
6 rates:

7 **Table 7: PCAP Rates (Actual, PIP, Minimum) by Type at Proposed Rates<sup>64</sup>**

	Actual PCAP Rate	PIP PCAP Rate	Minimum PCAP Rate
Met Ed	4,989	15,357	6,533
Penelec	5,566	22,479	6,659
PP	1,286	5,078	1,582
WPP	5,967	19,006	6,979
FE PA	<b>17,808</b>	<b>61,920</b>	<b>21,753</b>

8  
9  
10  
11  
12 As the above Table illustrates, nearly 18,000 PCAP customers across FE PA's service territory  
13 will receive the actual bill PCAP rate under the new PIP PCAP design and will experience the full  
14 financial brunt of any approved rate increase.

15 **Q: Your above analysis assumes FE PA's PIP CAP design will be implemented by the**  
16 **effective date of rates in this proceeding. What happens if the PIP CAP is not implemented**  
17 **by the effective date of rates?**

18 A: In short, the financial impact of any approved rate increase on PCAP customers would be  
19 more severe, especially in the short term. FE PA's current PCAP design calculates PCAP rates

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<sup>64</sup> CAUSE-PA I-3, Attachment A. Assumes implementation of PIP CAP rate.

1 based on a complicated CAP subsidy credit formula, which is calculated based on total household  
2 income, heating type, and energy burden based on the prior 12 months' bill.<sup>65</sup> This fixed subsidy  
3 credit amount is applied to a participant's monthly budget bill amount (known as the "Equal  
4 Payment Plan").<sup>66</sup> The subsidy credit is adjusted on monthly basis, subject to a maximum credit  
5 limit that varies by rate district.<sup>67</sup> This complex calculation, which relies on historical billing data,  
6 creates a lag in the ability for the subsidy credit to offset real-time changes in rates. Thus, under  
7 the current PCAP design, PCAP customers will be financially impacted by any approved rate  
8 increase for at least the first 11 months, until the subsidy fully accounts for the higher rates. Given  
9 the maximum cap on monthly PCAP subsidy credits, households that require more than the  
10 monthly subsidy to provide an affordable bill in any given month will experience the full  
11 unmitigated financial impact of any approved rate increase.

12 Notably, under FE PA's current PCAP design, program participants are removed from the  
13 program once their pre-program arrears are satisfied – causing low income households to face  
14 categorically unaffordable full-tariff rates.<sup>68</sup> It appears that a significant number of PCAP  
15 participants were removed because their arrears were satisfied: 410 in 2019; 513 in 2020; 779 in  
16 2021; 929 in 2022; 705 in 2023; and 103 between January and March 2024.<sup>69</sup> While it appears that  
17 FE PA's pending 2024 USECP does not contain this requirement,<sup>70</sup> it is unclear when the 2024  
18 USECP will take effect. The policies and procedures under the current 2019 USECP therefore  
19 further limit the ability of low income customers to remain in PCAP and access reduced rates.

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<sup>65</sup> 2019 USECP at 10-13.

<sup>66</sup> Id. at 10-11. Note that the PCAP Equal Payment Plan is not quite the same as FE PA's budget billing, as there is not a traditional "true up" at the end of a 12-month period. See id.

<sup>67</sup> Id. at 11, 12.

<sup>68</sup> 2019 USECP at 15.

<sup>69</sup> CAUSE-PA I-13, Attachment A.

<sup>70</sup> 2024 USECP at 14-15.

1 **Q: Does LIHEAP mitigate the harm of the proposed rate increase on low income**  
2 **households?**

3 A: No. LIHEAP is a federal program designed as a supplement to assist households to better  
4 afford energy services but is not adequate to address existing unaffordability – let alone increased  
5 unaffordability as a result of increased rates. LIHEAP helps low income households supplement  
6 the cost of their utility bills through the provision of annual Cash grants, available to all heating  
7 customers with household income at or below 150% FPL; and provides Crisis grants to households  
8 who have had service terminated or face imminent threat of termination. LIHEAP also provides  
9 emergency furnace repair and replacement services during the winter months, and helps to reduce  
10 home energy costs for low income families by supplementing funding for weatherization services  
11 through the Weatherization Assistance Program (WAP).

12 In the 2023-2024 program year, FE PA reports that 27,504 of its customers received a Cash  
13 grant; 5,991 customers received a Crisis grant; and 2,995 customers received both a Cash and  
14 Crisis grant.<sup>71</sup>

15 While LIHEAP is a critically important program and provides life-sustaining assistance to  
16 those in need, the program is only intended to provide supplemental assistance and is not enough  
17 to mitigate the financial harm of a rate increase. In the 2023/2024 LIHEAP program year, the  
18 minimum Cash grant was set at \$300 and the average electric Cash grant issued during the program  
19 year was \$384.<sup>72</sup> In the 2024/2025 LIHEAP program year, the minimum Cash grant is proposed  
20 to decrease to just \$200,<sup>73</sup> which will necessarily drive down the average assistance issued to

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<sup>71</sup> CAUSE-PA I-14, Attachment A.

<sup>72</sup> Pa. DHS, Energy Assistance Summary (EASUM) (report generated June 1, 2024).

<sup>73</sup> Low-Income Home Energy Assistance Program, Proposed State Plan and Public Hearing Schedule, 54 Pa.B. 3301 (June 8, 2024), available at: <https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol54/54-23/807.html>.

1 households next winter, when FE PA’s proposed rate increase would take effect. Furthermore, it  
2 is important to remember that LIHEAP is a heating assistance program. If a FE PA customer is  
3 not a heating customer or does not rely on electricity as a secondary or supplemental heating  
4 source, the customer household cannot access LIHEAP to help offset their non-heating electricity  
5 costs.

6 **Q: Do you have any proposals that could help remediate the financial impact of FE PA’s**  
7 **proposed rate increase on low income consumers?**

8 A: Yes. To the extent that the Commission approves any rate increase, I have several  
9 recommendations to offset the significant financial impact on low income consumers, which I will  
10 discuss in detail below. In short, to the extent that there is any rate increase, I recommend that the  
11 increase is allocated exclusively through the volumetric charge. As I discuss below, increasing  
12 the fixed customer charge undercuts the ability of ratepayers to offset costs through the adoption  
13 of energy efficiency and usage reduction efforts and the effectiveness of FE PA’s LIURP  
14 (WARM). I also recommend several reforms to FE PA’s universal service programs to improve  
15 enrollment and retention and to ensure that the programs are more widely available, adequately  
16 funded, and prudently designed to assist households in FE PA’s service territory to reasonably  
17 connect and maintain energy service to their home. As a whole, the recommendations offered  
18 below would reduce the financial harm of the proposed increase on low income households.

1 **IV. RATE DESIGN**

2 **Q: Please briefly describe FE PA’s fixed customer charge proposal.**

3 A: In its initial filing, FE PA proposes to continue using a combination of fixed and volumetric  
4 charges for residential customers, on a per Rate District basis. Table 8, shows the current and  
5 proposed fixed charges, by Rate District:

6 **Table 8: Proposed Rate Design, Fixed / Volumetric Charges<sup>74</sup>**

Rate District	Met-Ed	Penelec	Penn Power	West Penn
<b>Current Fixed Customer Charge</b>	\$11.25	\$11.25	\$11.00	\$7.44
<b>Proposed Fixed Customer Charge</b>	\$14.50	\$14.50	\$14.50	\$11.50
<b>Increase, Fixed Customer Charge</b>	\$3.25	\$3.25	\$3.50	\$4.06
<b>Current Volumetric Charge (per kWh)</b>	\$0.04800	\$0.06074	\$0.04437	\$0.03487
<b>Proposed Volumetric Charge (per kWh)</b>	\$0.06194	\$0.07636	\$0.06446	\$0.04747
<b>Increase, Volumetric Charge</b>	\$0.01394	\$0.01562	\$0.02009	\$0.01260

7  
8 As the above Table shows, FE PA is proposing between a 28.89% and a 54.57% increase  
9 to their fixed customer charge, depending on Rate District. Volumetric rates are proposed to  
10 increase between 1-2 cents per kWh.

11 **Q: How will FE PA’s proposal to increase the fixed portion of its rates by as much as  
12 54% impact its low income customers?**

13 A: FE PA’s fixed charge proposal will undermine the ability of consumers to control costs  
14 through energy efficiency, conservation, and consumption reduction, which is particularly  
15 problematic for low income consumers. Due to disparities in housing and heating system

<sup>74</sup> FE PA Exhibit No. MSK-2, Page 17 of 118, Supplement No. 3 to Electric Pa P.U.C. No. 1 First Revised Page 61 Superseding Original Page 61.

1 efficiency, low income households often have greater potential to reduce energy and gain cost  
2 benefits through installation of comprehensive efficiency and conservation measures. Low income  
3 customers already struggle profoundly to pay for electric service and rely on the ability to offset  
4 high bills through conservation and usage reduction. Regardless of the level of household usage,  
5 any increase to the fixed charge erodes the ability of consumers to effectively deploy efficiency  
6 and conservation measures to achieve bill savings.

7 **Q: Would FE PA’s proposed increase to the fixed charge impact the effectiveness of its**  
8 **Low Income Usage Reduction Program (LIURP)?**

9 A: Yes. FE PA’s proposal to dramatically increase its fixed charge will undermine the  
10 regulatory goals for LIURP. The Commission’s LIURP regulations explicitly provide that LIURP  
11 is intended to help low income customers to reduce their bills and, in turn, to “decrease the  
12 incidence and risk of customer payment delinquencies and the attendant utility costs associated  
13 with uncollectible accounts expense, collection costs and arrearage carrying costs.”<sup>75</sup> As discussed  
14 in detail below, LIURP – when adequately available and structured – is effective at achieving these  
15 goals, and provides meaningful usage reduction to program participants. The ability to save money  
16 through energy efficiency is tied directly to a bill structure that bases costs on throughput. But if  
17 more residential customer costs are shifted to the fixed charge, the achievable bill savings – and  
18 the corresponding impact on bill payment behavior – will erode. Thus, increasing the fixed  
19 customer charge limits the ability of the LIURP program to help program participants to achieve  
20 meaningful bill savings.

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<sup>75</sup> 52 Pa. Code § 58.1 (“The programs are intended to assist low-income customers conserve energy and reduce residential energy bills. The reduction in energy bills should decrease the incidence and risk of customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs.”).

1 **Q: Do you have any recommendations regarding FE PA’s fixed charge proposal?**

2 A: Yes. FE PA’s fixed monthly customer charge should not be increased. To the extent that  
3 any increase in the Company’s residential distribution rates is approved, it should be applied to the  
4 volumetric charge. This would protect the ability of low income households to lower their utility  
5 costs by reducing consumption and would preserve the effectiveness of LIURP at reducing  
6 customer bills and improving payment behavior.

7 **V. PROPOSED RECOVERY OF UNCOLLECTIBLE EXPENSES**

8 **Q: Please summarize FE PA’s proposals related to recovery of uncollectible account**  
9 **expenses to which you wish to respond.**

10 A: FirstEnergy is seeking recovery in this proceeding of uncertain and speculative  
11 uncollectible expenses that it alleges *may occur if* the Pennsylvania legislature *were* to pass certain  
12 reforms to the billing, collections, and termination standards in Chapter 14 of the Public Utility  
13 Code and, in turn, *assuming* those reforms increase uncollectible expenses.<sup>76</sup>

14 Chapter 14 of Title 66 of Pennsylvania Consolidated Statutes, known as the Responsible  
15 Utility Customer Protection Act, governs consumer billing, collections, termination, and other  
16 consumer service standards related to Pennsylvania’s public utilities. The vast majority of water,  
17 gas and electric customers in our Commonwealth are subject to the provisions of Chapter 14  
18 concerning service connection, billing, involuntary terminations, fees and deposits, delinquent  
19 bills, payment plans, and other collections-related issues.

20 Chapter 14 is scheduled to sunset in December 2024, and the General Assembly is  
21 contemplating whether and how to reauthorize the Chapter. Currently, there are two bills pending

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<sup>76</sup> FE PA St. 8 at 12-13.

1 before the General Assembly which would reauthorize and amend Chapter 14 – House Bill 1077  
2 and Senate Bill 1017. HB 1077 and SB 1017 propose very different and contradictory reforms.<sup>77</sup>  
3 As of the date of this testimony, it is unknown whether or to what extent any of the proposals set  
4 forth in either of these bills will ultimately be passed.

5 FE PA projects uncollectible account expenses based on wildly speculative assumptions  
6 about what the legislature will include in any final bill reauthorizing Chapter 14 and, in turn, based  
7 on specious projections estimating what the impact of those speculative changes would be on  
8 uncollectible expenses.<sup>78</sup> FE PA indicates that, if the General Assembly does not adopt the  
9 proposed changes to Chapter 14 as FE speculates it may, the Company will accordingly update its  
10 uncollectible expense claim for the FPFTY.<sup>79</sup>

11 **Q: Do you agree with FirstEnergy’s proposals to include certain uncollectible account**  
12 **expenses related to Chapter 14 reforms?**

13 A: Absolutely not. It is inappropriate to allow recovery of uncollectible account expenses  
14 based on the speculative effects of potential legislative reform, including any theoretically possible  
15 reforms to Chapter 14. Furthermore, FE PA’s assumptions are based on the erroneous conclusion  
16 that the above noted reforms would increase uncollectible expenses. Even if these Chapter 14  
17 reforms were to pass the legislature, the potential reforms are likely to *improve* collections rates –  
18 ensuring that more residential consumers remain connected to service and making payments on  
19 their bills.

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<sup>77</sup> Pa. Gen. Assembly, Regular Session 2023-2024, HB 1077, available at:  
<https://www.legis.state.pa.us/cfdocs/billinfo/billinfo.cfm?year=2023&sind=0&body=H&type=B&bn=1077>; Pa.  
Gen. Assembly, Regular Session 2023-2024, SB 1017, available at:

<https://www.legis.state.pa.us/cfdocs/billinfo/billinfo.cfm?year=2023&sind=0&body=S&type=B&bn=1017>.

<sup>78</sup> FE PA St. 8 at 12-13.

<sup>79</sup> FE PA St. 8 at 13.

1 As discussed, it is currently unclear which, *if any*, of the proposed reforms in HB 1077 and  
2 SB 1017 will ultimately pass the General Assembly and be signed into law by the Governor.  
3 Indeed, it is unclear at this time whether Chapter 14 will be reauthorized at all. It is likewise  
4 unclear whether any of the changes utilized in FE PA's projections will be adopted or, in turn,  
5 what the effect of those changes will eventually have on collections costs. While FE PA argues  
6 that, if these changes do not occur, they will adjust their uncollectible expense claim, it is  
7 inappropriate to allow FE PA to recover based on highly speculative projections of which reforms  
8 may ultimately be passed by the General Assembly.

9 I note, last, that the reforms set forth in the current bills before the General Assembly are  
10 intended to address the continued issues inherent in Chapter 14 which have led to increased  
11 customer debt, terminations, and uncollectible expenses and, in turn, affect all ratepayers. In my  
12 opinion, and contrary to FE PA's unsupported assertions, many of the currently contemplated  
13 reforms would provide new preventative tools to equitably address affordability challenges and  
14 keep customers connected to services and make payments toward their debts – thereby *reducing*  
15 uncollectible expenses.

16 Ultimately, FE PA has not put forward any reasonable evidence to show that any of these  
17 presently unenacted potential modifications to Chapter 14 will ultimately be approved or, in turn,  
18 will increase uncollectible expenses.

19 **Q: Do you have any recommendations related to FE PA's proposals for recovery of**  
20 **uncollectible account expenses?**

21 A: Yes. For the foregoing reasons, FE PA's proposal related to recovery of uncollectible  
22 account expenses related to potential future amendments to Chapter 14 must be denied in its  
23 entirety.

1        **VI.    UNIVERSAL SERVICE AND ENERGY CONSERVATION PROGRAMS**

2        **Q:    Please briefly describe FE PA’s universal service and energy conservation**  
3        **programs.**

4        A:    FE PA operates four Universal Service programs that assist low income customers: (1)  
5        PCAP; (2) the Hardship Fund (Dollar Energy Fund); (3) LIURP, otherwise known as WARM; and  
6        (4) the Customer Assistance Referral and Evaluation Services (CARES).<sup>80</sup>

7        **Q:    Please explain how this section of your testimony is organized.**

8        A:    I will assess and offer recommendations to offset the impact of the rate increase on low  
9        income populations for (1) FE PA’s PCAP; (2) FE PA’s Hardship Fund; (3) FE PA’s LIURP,  
10        known as WARM; (4) overall universal service screening, outreach, and enrollment; and (5)  
11        overall administration of FE PA’s universal service programs.

12        As explained above, rates are not just or reasonable when they are unaffordable for more  
13        than an estimated one quarter of the residential population. Any increase in rates will exacerbate  
14        the current level of unaffordability. As discussed, the Commission recently approved FE PA to  
15        implement a PIP structure for its PCAP. While implementation of a PIP is vital to combat  
16        preexisting unaffordability for FE PA’s low income customers, it is essential that FE PA be  
17        required to implement further mitigation of rate unaffordability (both at present and proposed  
18        rates), so that its low income customers can connect to and maintain affordable utility services.

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<sup>80</sup> 2019 USECP at 1; 2024 USECP at 1.



1 retirement of their arrears – forcing low income customers to face demonstrably unaffordable rates  
2 and increasing the likelihood that they will accrue additional arrears soon after being removed  
3 from the program. This policy was eliminated from FE PA’s recently approved USECP. I  
4 recommend that FE PA implement all approved changes to FE PA’s PCAP that are not impacted  
5 by the narrow review.

6           Moreover, to the extent FE PA’s current PCAP design is still in place as of the effective  
7 date of rates in this proceeding, FE PA should adjust its maximum CAP credit limits in two stages.  
8 First, to address existing unaffordability within FE PA’s PCAP program, it should adjust its current  
9 CAP credit limits to an amount necessary to ensure that at least 95% of its PCAP participants in  
10 each rate district through the prior program year would have received adequate credits necessary  
11 to ensure their bills would not exceed applicable energy burden standards. Second, FE PA should  
12 further adjust CAP credit limits by a percentage equal to any approved rate increase in this  
13 proceeding.

14           As explained above, I am advised by Counsel for CAUSE-PA that issues surrounding the  
15 justness and reasonableness of instituting a maximum CAP credit in tandem with FE PA’s recently  
16 approved (though yet unimplemented) PIP CAP design are pending reconsideration before the  
17 Commission. Thus, I will not offer further recommendations at this time regarding FE PA’s  
18 maximum CAP credit policy, as it pertains to FE PA’s PIP CAP design. However, I reserve the  
19 right to offer further recommendations with respect to this policy if the Commission reaches a  
20 decision on this pending matter.

1 **B. Hardship Fund (Dollar Energy)**

2 **Q: Please briefly describe FE PA’s Hardship Fund.**

3 A: FE PA’s Hardship Fund is administered by Dollar Energy Fund (DEF). It provides eligible  
4 customers with grants up to \$500.<sup>82</sup> To qualify for a FE PA Hardship Fund grant, residential  
5 customers living in a single home or apartment must have household income at or below 250%  
6 FPL<sup>83</sup> and meet the following requirements:<sup>84</sup>

- 7 • Must have paid a minimum of \$150 on their account within the past 90 days (minimum of  
8 \$100 if age 62 and over);
- 9 • Account balance must be at least \$100 (customers age 62 and over may have a \$0 balance  
10 but not a credit balance);
- 11 • Hardship Funding grant (alone or in combination with other funding sources) must be  
12 enough to end termination process or restore services.

13 The extent to which FE PA customer can access the FE PA Hardship Fund also varies  
14 throughout the program year as follows:

- 15 • October 1 - November 30: Service Terminated or Pending Termination
- 16 • December 1 - January 31: Service Terminated
- 17 • February 1 - February 28: Service Terminated or Pending Termination
- 18 • March 1 - September 30: Open to All Non-PCAP Customers; PCAP customers with  
19 Pending Termination or Service Terminated are also eligible.

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<sup>82</sup> 2019 USECP at 5; 2024 USECP at 6.

<sup>83</sup> USECP indicates that exceptions will be made based on circumstances.

<sup>84</sup> 2019 USECP at 6; 2024 USECP at 7.

1 However, FE PA’s USECP also indicates that, as the availability of hardship funds may reduce  
2 over the program year, eligible account status is subject to change until the program is closed based  
3 on priority (i.e. service terminated/ pending termination; service terminated; closed).<sup>85</sup>

4 **Q: Do you have any concerns about the ability of low income customers to access**  
5 **hardship funding?**

6 A: Yes, I have several concerns. First, I am concerned that FE PA’s Hardship Fund is not  
7 adequately serving the well documented need for assistance. Despite the low number of customers  
8 awarded Hardship Fund grants by FE PA, the need for grant assistance amongst FE PA’s low  
9 income customers remains significant – as evidenced by the disproportionate termination rates and  
10 arrearage levels amongst FE PA’s low income customers, discussed earlier in my testimony.

11 The following Table shows the number of Hardship Fund recipients across Rate Districts  
12 from 2019 to date in 2024:

13 **Table 9: HF Grants Received (2019-2024)<sup>86</sup>**

	2019	2020	2021	2022	2023	2024 (Jan-Mar)
<b>Met-Ed</b>	571	909	776	1,204	539	82
<b>Penelec</b>	367	772	388	503	310	61
<b>PP</b>	199	218	227	412	186	26
<b>WPP</b>	527	961	662	711	869	113
<b>FE PE (Total)</b>	1,664	2,860	2,053	2,830	1,904	282

14  
15 In 2022 and 2023, the number of confirmed low income customers terminated for  
16 nonpayment (23,308) far outpaced the number of Hardship Fund grants issued (4,334).<sup>87</sup>

<sup>85</sup> 2019 USECP at 5; 2024 USECP at 6.

<sup>86</sup> CAUSE-PA II-1, Attachment A.

<sup>87</sup> CAUSE-PA II-1, Attachment A; CAUSE-PA I-16, Attachment C. \*FE PA indicates that it cannot generate termination data for nonpayment for CLI customers prior to 24 months from request date.

1           Second, I am concerned that the average hardship fund grant is out of line with the average  
 2 arrearage level carried by low income customers. The following Table compares the average  
 3 arrearage level for confirmed low income customers compared the average Hardship Fund grant  
 4 issued, across Rate Districts:

5           **Table 10: Average HF Grant v. Average CLI Arrearage (March 2022- 2024)**

	Met Ed	Penelec	PP	WPP
<b>March 2022</b>				
<b>Average HF Grant<sup>88</sup></b>	\$319	\$305	\$300	\$288
<b>CLI Average Arrearage<sup>89</sup></b>	\$991	\$1,005	\$1,128	\$1,110
<b>March 2023</b>				
<b>Average HF Grant<sup>90</sup></b>	\$344	\$312	\$331	\$327
<b>CLI Average Arrearage<sup>91</sup></b>	\$854	\$877	\$1,003	\$917
<b>March 2024</b>				
<b>Average HF Grant<sup>92</sup></b>	\$307	\$332	\$308	\$307
<b>CLI Average Arrearage<sup>93</sup></b>	\$900	\$907	\$991	\$905

6  
 7           As of the March 2024, the last reported month by FE PA, the average arrearage of CLI  
 8 customers was approximately three times higher than the average Hardship Fund grant issued.  
 9 These disparities highlight the gap in needed assistance in available Hardship Fund grants, and the  
 10 need to improve assistance provided under the Hardship Fund. A significant portion of low income  
 11 customers will have arrearages exceeding these averages – placing customers at risk of  
 12 termination.

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<sup>88</sup> CAUSE-PA II-3, Attachment A  
<sup>89</sup> CAUSE-PA I-23c, Attachment A  
<sup>90</sup> CAUSE-PA II-3, Attachment A  
<sup>91</sup> CAUSE-PA I-23c, Attachment A.  
<sup>92</sup> CAUSE-PA II-3, Attachment A  
<sup>93</sup> CAUSE-PA I-23c, Attachment A.

1 Third, I am concerned that FE PA projects zero dollars in ratepayer or employee  
 2 contributions to its Hardship Fund in 2024, 2025, and 2026 – punctuating a long trend of declining  
 3 donations. The below Table shows the amount of Hardship Funding received in 2022 through  
 4 2023, and projected levels in 2024 through 2026:

5 **Table 11: FE PA Hardship Funding (2022-2026)<sup>94</sup>**

<b>HF Funding</b>	<b>Utility Match Contributions</b>	<b>Ratepayer/ employee contributions</b>	<b>PA Consolidation<sup>95</sup></b>	<b>Total</b>
<b>2022</b>	\$327,378	\$350,544	-	\$677,922
<b>2023</b>	\$325,185	\$351,941	-	\$677,126
<b>2024</b>	\$335,000	\$0	\$150,000	\$485,000
<b>2025</b>	\$335,000	\$0	\$150,000	\$485,000
<b>2026</b>	\$335,000	\$0	\$150,000	\$485,000

6  
 7 As Table 11 shows, FE PA projects Hardship Funding will significantly decrease starting  
 8 in 2024 compared to levels in 2022 and 2023, driven by the lack of any ratepayer and employee  
 9 contributions collected through various fundraising initiatives.

10 FE PA’s voluntary ratepayer contributions have steadily declined over the past decade, as  
 11 evidenced by the following Table and accompanying Chart:

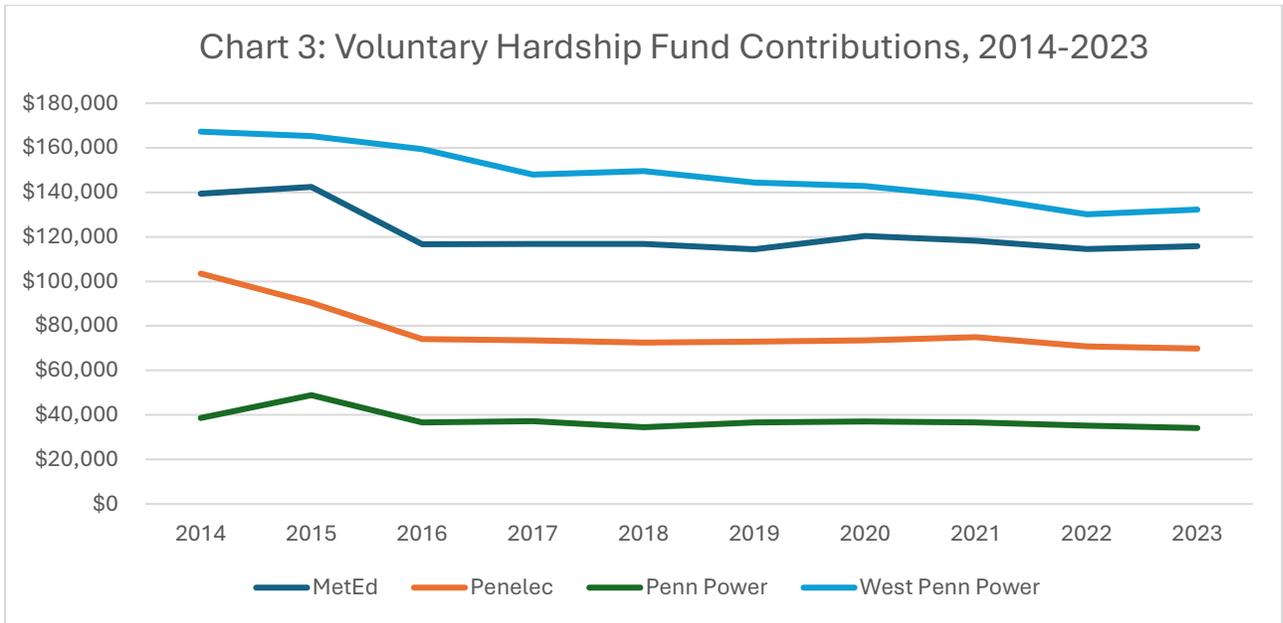
<sup>94</sup> CAUSE-PA II-4, Attachment A.

<sup>95</sup> Joint Application of FirstEnergy Pa. Companies for Consolidation, Joint Petition for Approval of Settlement, at Para. 46 (Joint Pet. filed Aug. 30, 2023). “The Joint Applicants agree to make contributions of \$150,000 annually to the Hardship Fund of FE PA, incremental to the current “matching contribution,” for a period of three years after Commission approval of the Transaction. The Joint Applicants additionally agree to make contributions of \$100,000 annually to the Hardship Fund of FE PA, 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. These will be shareholder contributions and not recovered from ratepayers.” Joint Application of FirstEnergy Pa. Companies for Consolidation, Order, (Order entered Dec. 7, 2023).

1 **Table 12: FirstEnergy PA Voluntary Contributions to Hardship Fund 2014 - 2022<sup>96</sup>**

<b>Year</b>	<b>Met-Ed</b>	<b>Penelec</b>	<b>Penn Power</b>	<b>West Penn</b>	<b>ALL FE</b>
<b>2014</b>	\$139,374	\$103,496	\$38,671	\$167,258	<b>\$448,799</b>
<b>2015</b>	\$142,424	\$90,360	\$48,870	\$165,222	<b>\$446,876</b>
<b>2016</b>	\$116,654	\$74,000	\$36,687	\$159,365	<b>\$386,706</b>
<b>2017</b>	\$116,812	\$73,444	\$37,244	\$147,917	<b>\$375,417</b>
<b>2018</b>	\$116,836	\$72,441	\$34,517	\$149,602	<b>\$373,396</b>
<b>2019</b>	\$114,404	\$72,859	\$36,639	\$144,381	<b>\$368,283</b>
<b>2020</b>	\$120,352	\$73,506	\$37,114	\$142,820	<b>\$373,792</b>
<b>2021</b>	\$118,207	\$74,929	\$36,610	\$137,835	<b>\$367,581</b>
<b>2022</b>	\$114,531	\$70,717	\$35,177	\$130,119	<b>\$350,544</b>
<b>2023</b>	\$115,833	\$69,827	\$34,103	\$132,178	<b>\$351,941</b>
<b>2024 (projected)</b>	\$0	\$0	\$0	\$0	<b>\$0</b>

2



3

<sup>96</sup> 2022 Universal Service Report at 78; 2021 Universal Service Report at 81; 2020 Universal Service Report at 78; 2019 Universal Service Report at 68; 2018 Universal Service Report at 70; 2017 Universal Service Report at 64; 2016 Universal Service Report, at 63; 2015 Universal Service Report, at 50; 2014 Universal Service Report, at 50.

1 Finally, I note that FE PA’s Hardship Fund has experienced many periods where grant  
2 funding was either fully depleted or otherwise unavailable in each service territory.<sup>97</sup>

- 3 • Met Ed: June-Sept. 2023
- 4 • Penelec: April-Sept. 2019, June-September 2021, June-Sept. 2022, April-Sept. 2023
- 5 • PP: Aug-Sept 2019
- 6 • WPP: Aug-Sept 2022, May-Sept 2023

7 The chronic unavailability of hardship funds throughout the program year underscores the need to  
8 significantly improve assistance provided under the Hardship Fund.

9 **Q: Do you have any other concerns about FE PA’s Hardship Fund eligibility**  
10 **requirements?**

11 A: Yes. PCAP customers are not able to access Hardship Fund grants from March 1 through  
12 September 30 unless they have a pending termination notice or their service is off.<sup>98</sup> The  
13 remainder of the year, PCAP customers can only access grant assistance if their service is off. In  
14 2023, it appears that 30 applicants to the Hardship Fund were denied because of PCAP status.<sup>99</sup>

15 Even with monthly rate assistance, PCAP customers face profound barriers to affording  
16 their monthly bills and staying connected to services and often encounter added financial hardships  
17 that cause them to fall behind on their PCAP bill. Denying Hardship Fund grants to PCAP  
18 customers prevents FE PA’s universal service programs from working in tandem – thus limiting  
19 the ability of these programs to holistically achieve consistent affordability for low income  
20 customers.

21 I am also concerned that FE PA currently limits hardship funding during certain times of  
22 the year to only customers who have experienced a service termination. As discussed, between  
23 December 1 and January 31, grants are only available to customers whose service has been

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<sup>97</sup> CAUSE-PA II-3, Attachment B.

<sup>98</sup> 2019 USECP at 5.

<sup>99</sup> CAUSE-PA II-2, Attachment A.

1 terminated. This creates an unreasonable and illogical situation wherein an applicant for grant  
2 funding must wait until their service is terminated to qualify for grant assistance, increasing  
3 collections costs borne by other ratepayers and causing low income families to incur additional  
4 late fees and other avoidable consequences associated with involuntary service termination.

5 Finally, I am concerned that FE PA's Hardship Fund continues to require substantial  
6 upfront payment requirements to access emergency grant assistance. Upfront payment  
7 requirements imposed as a condition precedent to receipt of emergency assistance present  
8 insurmountable barriers to receiving Hardship Fund assistance for those customers facing the most  
9 acute financial distress. Customers unable to make payments for several months due to an acute  
10 financial hardship are essentially disqualified from receiving critical grant assistance – precisely  
11 when Hardship Fund grant assistance is most needed. In my experience working with low income  
12 families, most have already exhausted their resources, including obtaining support from family  
13 and friends, before applying for grant assistance programs. I have personally assisted clients facing  
14 similar up-front payment requirements, who have resorted to borrowing from predatory payday  
15 lenders to make them eligible to receive grant assistance to prevent termination – compounding  
16 financial strain.

17 **Q: Do you have any recommendations related to FE PA's Hardship Fund?**

18 A: Yes. I recommend that FE PA increase its maximum grant amount and annual Hardship  
19 Fund budget, eliminate its upfront payment requirements, and take additional steps to focus  
20 hardship funding to reduce the stark unmet need amongst its low income customers. While these  
21 improvements are critical to address need amongst low income customers at present rates, they are  
22 even more essential to better insulate low income families from the hardship that would result if  
23 FE PA is permitted to increase its rates for basic electric services.

1           First, I recommend that FE PA increase its annual funding available for grant assistance to  
2 \$1 million – an approximate \$322,874 increase over 2023 levels (\$677,126). While I do not take  
3 a position on the source of this funding, I note that FE can and should increase efforts to solicit  
4 voluntary donations to the program to help support this recommended increase. As discussed,  
5 beginning in 2024, it appears FE PA is no longer projecting any ratepayer or employee donations  
6 to the hardship fund – punctuating years of declining donations across each of its service territories.  
7 It is imperative that FE PA find solutions to address this decline. Specifically, FE PA should  
8 explore how to improve solicitation of donations through e-billing – including round-up and add-  
9 a-buck programs. Further, I recommend that FE consider a plan to solicit voluntary contributions  
10 from the larger commercial and industrial entities within its service territory, which do not  
11 currently contribute any funds to support universal service programs through rates. I recommend  
12 that FE PA be required to consult with its Universal Service Advisory Committee (USAC) and  
13 develop a plan to increase voluntary contributions to its Hardship Fund grant, with a report being  
14 provided to the Commission within 6 months of a final order in this proceeding.

15           Second, I recommend that FE PA be required to adopt explicit exemptions to its upfront  
16 payment requirements. These exemptions should include, at minimum, exemptions for: (1)  
17 households with members under 5 or over 60; (2) households with members who are medically  
18 vulnerable; (3) during the summer months (June – September) and heat advisories; and (4) victims  
19 of domestic violence. FE PA should, in turn, work with DEF to update its customer facing  
20 materials to reflect this changed policy without delay. If a customer meets all the required  
21 eligibility criteria for FE PA’s Hardship Fund, they should be able to receive a Hardship Fund  
22 grant without upfront payment.

1 Third, I recommend that FE PA be required to amend its seasonal parameters for its  
2 Hardship Fund so that, at minimum, customers whose electric service is off or *who are at risk of*  
3 *termination* can qualify for a Hardship Fund grant. Hardship Fund applicants should not have to  
4 wait until their service is terminated – and thereby place themselves and their families at greater  
5 critical risk – before they can access emergency grant assistance. Thus, if a customer otherwise  
6 qualifies for a FE PA Hardship Fund grant and is either off or in threat of termination, they should  
7 qualify for a Hardship Fund grant at any point during the year to the extent funds remain.

8 Fourth, I recommend that FE PA eliminate any prohibitions against PCAP customers  
9 receiving a Hardship Fund grant. As discussed, PCAP customers struggle profoundly to afford  
10 their monthly bills and stay connected to services and are not immune from experiencing financial  
11 hardship – even with monthly assistance through PCAP. If a PCAP customer otherwise qualifies  
12 for a Hardship Fund grant, they should be able to access grant funding throughout the program  
13 year. FE PA should, in turn, work with DEF to update its customer facing materials to reflect this  
14 changed policy without delay.

15 Finally, I recommend that FE PA increase its maximum grant amount from \$500 to \$600.  
16 Although I recognize this means fewer customers may receive grant assistance, a higher maximum  
17 grant amount would enable a households at higher debt levels avoid termination. Increasing the  
18 grant amount will also help to better address the increase in average arrears likely to follow an  
19 increase in rates. Raising the maximum grant offered by FE PA’s Hardship Fund will also help  
20 further the explicit statutory purpose of universal service programs to assist low income customers  
21 to maintain electric service to their home – providing a greater level of relief to those experiencing  
22 a hardship.

1 **C. Low Income Usage Reduction Program**

2 **Q: Please briefly describe FE PA’s LIURP (WARM).**

3 A: FE PA’s LIURP – or WARM – is available to residential customers with household  
4 incomes at or below 150% FPL.<sup>100</sup> FE PA also reserves up to 20% of its WARM budget to serve  
5 special needs customers with household incomes between 151-200% FPL.<sup>101</sup> Special needs  
6 customers includes those with overdue account balances, as well as customers with medical  
7 problems, personal crisis situations, or loss of income.<sup>102</sup> Currently, WARM participants must also  
8 meet an annual electric usage threshold of 6,500 kWh to qualify for services.<sup>103</sup> However, in FE  
9 PA’s proposed 2024 USECP, the Commission has approved a lower minimum usage threshold of  
10 6,000 kWh.<sup>104</sup> In addition, no minimum usage is required for customers whose WARM services  
11 are coordinated with the PA Weatherization Assistance Program (WAP) or with a gas utility’s  
12 LIURP.<sup>105</sup> WARM participants must reside at the service address and have a minimum of 6 months  
13 of consecutive service.<sup>106</sup>

14 In addition, FE PA’s WARM provides for health and safety measures to be installed which  
15 allow WARM contractors to eliminate impediments to be able to proceed with the installation of  
16 energy-saving measures at the customer’s home. FE PA allocates up to 50% of its seasonal  
17 allowance to be spent on health and safety measures, which is in addition to the seasonal allowance  
18 funds to install energy reduction measures.<sup>107</sup>

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<sup>100</sup> 2019 USECP at 19; 2024 USECP at 20.

<sup>101</sup> Id.

<sup>102</sup> Id.

<sup>103</sup> Id.

<sup>104</sup> 2024 USECP Order at 70.

<sup>105</sup> 2019 USECP at 20; 2024 USECP at 21.

<sup>106</sup> Id.

<sup>107</sup> 2024 USECP at 26; 2019 USECP at 21-22.

1 **Q: Is FE PA proposing any changes or improvements to its LIURP in the present**  
2 **proceeding?**

3 A: No.

4 **Q: What is the purpose of LIURP?**

5 A: The purpose of LIURP is to assist low income households to maintain services to their  
6 home. The program achieves this purpose by conserving energy, reducing bills, improving  
7 payments, decreasing collections costs, reducing peak demand, and improving home health, safety,  
8 and comfort.<sup>108</sup>

9 **Q: Is FE PA's LIURP performing adequately to achieve the goals and objectives of the**  
10 **program?**

11 A: No. FE PA's LIURP is simultaneously underfunded and undersubscribed. As a result,  
12 while there is a tremendous need for program services, FE is not taking the appropriate steps to  
13 address this unmet need. For those customers able to receive LIURP services, FE PA's LIURP can  
14 and does play an important role in mitigating rate unaffordability for low income customers over  
15 the long term, in turn reducing collection costs, improving uncollectible expenses, and decreasing  
16 involuntary terminations for nonpayment. I believe that additional reforms to the program are  
17 necessary to help reduce deep unaffordability for low income households in FE PA's service  
18 territory – especially if FE PA is permitted to increase rates of basic electric service.

19 FE PA reports the following average annual savings from treated LIURP households in  
20 2021 (the last reported year by FE PA):

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<sup>108</sup> 66 Pa. C.S. § 2203 (“‘Universal service and energy conservation.’ Policies, protections and services that help low-income customers maintain electric service. The term includes ...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.”); 52 Pa. Code § 58.1.

**Table 13: Average Annual Savings for Treated LIURP Households<sup>109</sup>**

<b>2021</b>	<b>Space Heat</b>	<b>Water Heat</b>	<b>Baseload</b>
<b>Met-Ed</b>	\$94.57	\$255.93	\$94.44
<b>Penelec</b>	\$139.44	\$70.90	\$74.39
<b>Penn Power</b>	\$150.19	\$93.35	\$63.96
<b>WPP</b>	\$198.66	\$111.49	\$82.50
<b>Statewide Average</b>	\$167	\$146	\$71

These savings levels are significant and could help to substantially reduce the impact of any approved increase in rates.

Unfortunately, FE PA’s LIURP serves very few households relative to identified need. According to an adjusted April 2023 WARM needs assessment, FE PA identified 406,908 potentially eligible households across its Rate Districts.<sup>110</sup> Yet in the same year, FE PA served just 4,474 households across its service territory – or 1.6% of households identified in FE PA’s needs assessment.<sup>111</sup>

**Table 14: WARM Needs Assessment, April 2023<sup>112</sup>**

	<b>Met Ed</b>	<b>Penelec</b>	<b>PP</b>	<b>WPP</b>	<b>Total FE PA</b>
<b>Total Potential Participants (at/below 150% FPL)</b>	76,411	72,573	16,416	116,497	281,897
<b>Total Potential Participants (151-200% FPL)</b>	35,531	31,607	8,590	49,283	125,011
<b>Total</b>	111,942	104,180	25,006	165,780	406,908

<sup>109</sup> CAUSE-PA II-22, Attachment A; 2022 Universal Service Report at 57.

<sup>110</sup> CAUSE-PA II-16, Attachment A.

<sup>111</sup> CAUSE-PA II-14, Attachment A.

<sup>112</sup> CAUSE-PA II-16, Attachment A.

**Table 15: LIURP Jobs Completed (2019- 2024 YTD)<sup>113</sup>**

	2019	2020	2021	2022	2023	2024	Total
<b>Met-Ed</b>	1,617	1,109	1,269	937	1,027	309	6,268
<b>Penelec</b>	2,541	1,324	1,953	1,689	1,916	545	9,968
<b>Penn Power</b>	1,011	570	695	613	484	157	3,530
<b>West Penn Power</b>	1,255	1,002	1,201	961	1,047	417	5,883
<b>Totals</b>	6,424	4,005	5,118	4,200	4,474	1,428	25,649

As the above Table shows, there was a substantial decline in LIURP jobs completed from 2019 (6,424) to 2020 (4,005), attributable primarily to restrictions associated with the COVID-19 pandemic. However, it appears that FE PA’s LIURP has not returned to pre-pandemic production levels.

Further, despite the overwhelming unmet need for comprehensive usage reduction services, FE PA consistently underspends available dollars.

**Table 16: Projected WARM Budget v. WARM Spending (2019-2022)<sup>114</sup>**

	2019		2020		2021		2022	
	Projected Budget	Actual Spending						
<b>Met-Ed</b>	\$5,230,882	\$5,319,200	\$5,442,000	\$5,243,891	\$5,949,109	\$5,760,936	\$6,284,233	\$5,996,087
<b>Penelec</b>	\$6,793,662	\$7,049,211	\$6,126,000	\$4,571,159	\$8,014,841	\$6,046,027	\$8,816,414	\$6,835,496
<b>PP</b>	\$3,496,630	\$2,842,470	\$3,643,161	\$2,320,305	\$4,460,856	\$3,122,296	\$4,539,320	\$3,213,204
<b>WPP</b>	\$5,738,574	\$5,189,877	\$6,426,697	\$5,420,587	\$7,322,110	\$6,941,354	\$7,075,716	\$7,493,636
<b>Total</b>	\$21,259,748	\$20,400,758	\$21,637,858	\$17,555,942	\$25,746,916	\$21,870,613	\$26,715,683	\$23,538,423
<b>Total Underspent</b>	\$858,990		\$4,081,916		\$3,876,303		\$3,177,260	

<sup>113</sup>CAUSE-PA II-14, Attachment A.

<sup>114</sup> 2019 Universal Service Report at 45; 2020 Universal Service Report at 52; 2021 Universal Service Report at 55; 2022 Universal Service Report at 53.

1 FE PA's consistent failure to fully expend its available budget in the face of substantial need  
2 suggests that the program is not well known, is inaccessible, and is not appropriately coordinated  
3 with other complimentary programs. While FE PA carries over unspent funds, I am concerned  
4 about the compounding nature of ongoing delays in serving eligible customers – especially in the  
5 face of rising rates.

6 For WARM to meaningfully offset the impact of the proposed rate increase for low income  
7 customers, FE PA must expand program availability - ensuring that more eligible customers can  
8 meaningfully access services to achieve bill savings through energy efficiency, conservation, and  
9 weatherization.

10 **Q: Do you have any other observations or comments regarding FE PA's LIURP?**

11 A: Yes. Recent state and federal legislation has increased the resources available for home  
12 repairs, weatherization, and electrification. Since the passage of Pennsylvania's Whole Home  
13 Repair Act, there has been an increase in the home repair programs offered by local agencies that  
14 could reduce the number of home deferrals and/or facilitate coordinated installation of efficiency  
15 and usage reduction improvements.<sup>115</sup> Moreover, since passage of the Infrastructure Inflation and  
16 Jobs Act in 2021 and the Inflation Reduction Act in 2022, there is increased funding which can  
17 now or will soon be available to be leveraged with LIURP to help improve the comprehensiveness  
18 of services delivered to low-income customers, lower overall home energy burdens, and mitigate  
19 issues that would otherwise prevent LIURP measures from being installed.<sup>116</sup> While FE PA's  
20 LIURP permits waiver of the high usage threshold to permit coordination of services with the state  
21 Weatherization program, it is unclear whether and to what extent FE PA engages in any affirmative

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<sup>115</sup> See Pa. DCED, Whole Home Repairs, available at: <https://dced.pa.gov/programs/covid-19-arpa-whole-home-repairs-program/>.

<sup>116</sup> See Pa. DEP, Inflation Reduction Act, available at: <https://www.dep.pa.gov/Citizens/Energy/Pages/Inflation-Reduction-Act.aspx>.

1 activities in attempt to leverage and/or coordinate LIURP with home repair, efficiency, and  
2 weatherization programs operated across its region.

3 **Q: Do you have any recommendations for how FE PA can improve its WARM program?**

4 A: Yes. To help offset the impact of any approved rate increase on low income and address  
5 the clear unmet need for WARM services in FE PA's service territory, I recommend that the  
6 Commission order FE PA to increase its LIURP annual budget by a percentage equal to any  
7 approved increase in residential rates in this proceeding, allocated proportionally amongst FE PA's  
8 Rate Districts.

9 Increasing FE PA's WARM budget in this manner would help to expand the availability  
10 of the program to serve substantial unmet need, which will undeniably grow if FE PA is approved  
11 to further increase already unaffordable rates. I also recommend that the Commission continue to  
12 require FE PA to carryover any unspent WARM funds from a previous program year and add it to  
13 the budget for the following year.

14 Further, I recommend that the Commission require FE PA to improve efforts to proactively  
15 coordinate delivery of services with other local, state, and federal efficiency, weatherization, and  
16 home repair programs that can help remediate health, safety, and other home repair issues that  
17 prevent the installation of comprehensive efficiency measures and cannot be resolved through FE  
18 PA's health and safety budget alone. Specifically, FE PA should host a series of collaborative  
19 meetings with members of its USAC, as well as local weatherization and home repair program  
20 administrators across its service territory, to identify concrete ways to leverage and coordinate  
21 LIURP with home repair and weatherization programs across its service territory. Within six  
22 months of a final order in this rate case, FE PA should provide the Commission and its USAC with  
23 a report that addresses:

- 1 1) How FE PA intends to coordinate its delivery of LIURP services with home repair,  
2 weatherization, and electrification programs.
- 3 2) Identified barriers to coordination, and the efforts it has made or intends to make to  
4 address those barriers.
- 5 3) Next steps FE PA will be taking to eliminate identified barriers.

6 Coordination is critical – FE PA must leverage its LIURP investments with other programs to  
7 bring costs down both for low-income customers and all customers through reduced CAP costs,  
8 uncollectible expenses, and other collections-related costs.

#### 9 **D. Universal Service Screening, Enrollment, and Retention**

10 **Q: Is FE PA proposing any change related to its enrollment efforts for its universal**  
11 **service and energy efficiency programs?**

12 **A:** Yes. FE PA proposes to create an Energy Assistance Outreach Team (EAOT) to increase  
13 the awareness of, and participation in, energy assistance programs available to low income  
14 customers throughout FE PA’s service territory.<sup>117</sup> The EAOT would be responsible for creating  
15 education resources, tools, and technology; would engage with local organizations related to  
16 barriers to program participation; develop strategies to increase participation; host and participate  
17 in community events; and provide support to social service agencies.<sup>118</sup> FE PA indicates that it is  
18 proposing the EAOT because 24% of FE PA’s residential customers are estimated to be low  
19 income and only a quarter of those low income customers participate in available low income  
20 programs.<sup>119</sup> FE PA also indicates that the EAOT would utilize methods currently implemented  
21 across FE PA’s service territory to outreach to customers with limited English proficiency (LEP),  
22 including through translated application and outreach materials.<sup>120</sup>

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<sup>117</sup> FE PA St. 8 at 9.

<sup>118</sup> FE PA St. 8 at 9-10.

<sup>119</sup> FE PA St. 8 at 10.

<sup>120</sup> FE PA St. 8 at 11: 11-17.

1 FE PA indicates that a centralized, dedicated team to assist customers with information  
2 about enrollment in assistance programs will benefit customers by helping eligible customers to  
3 receive assistance.<sup>121</sup> PA proposes an annual EAOT budget of \$762,520.<sup>122</sup> These costs would  
4 only be charged to the residential class, and be allocated proportionately per Rate District.<sup>123</sup> This  
5 budget would support 7 full-time dedicated staff.<sup>124</sup> FE PA proposes to measure EAOT impact by  
6 monitoring the number of customers enrolled in FE PA’s assistance program, compared to  
7 historical numbers.<sup>125</sup>

8 **Q: Do you support the EAOT?**

9 A: In part yes, though I urge further refinement of the proposal and amendment to incorporate  
10 routine screening and enhanced data utilization. I share FE PA’s concern. Its universal service  
11 programs are woefully undersubscribed and reach just a fraction of FE PA’s eligible low income  
12 customers. FE PA must dedicate resources to expand universal service program enrollment and  
13 retention, especially if any rate increase is approved as a result of this proceeding. That said, I am  
14 concerned FE PA’s EAOT – without refinement and amendment – may not achieve these critical  
15 goals and I question the justification for recovering additional dollars to support the planned  
16 activities.

17 First, FE PA’s EAOT proposal does not provide adequate specificity to ensure that the  
18 initiative, if approved, would meaningfully increase enrollment and participation in FE PA’s  
19 universal service programs. FE PA’s proposal notes only broad concepts and potential activities,  
20 without specific deliverables, identified timeframes, measurable goals, or quantifiable

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<sup>121</sup> FE PA St. 8 at 10.

<sup>122</sup> FE PA St. 8 at 10: 21-22.

<sup>123</sup> FE PA St. 8 at 11: 1-8.

<sup>124</sup> FE PA St. 8 at 11: 1-11.

<sup>125</sup> FE PA St. 8 at 12: 1-3.

1 outcomes.<sup>126</sup> Rather than specify quarterly, biannual, or even annual enrollment targets, FE PA  
2 proposes to measure success against historic enrollment without any specific, quantifiable  
3 targets.<sup>127</sup>

4           Moreover, while outreach and engagement are important, it is also imperative that  
5 additional data and process-driven solutions be utilized to help streamline processes and remove  
6 long-standing barriers to program enrollment and program retention. Indeed, I believe that a  
7 significant driver for this persistent under-enrollment- as well as the high level of low income  
8 arrears and terminations- is that FE PA does not have adequate systems in place to ensure that low  
9 income customers are timely matched with available assistance prior to the accrual of  
10 unmanageable arrears that ultimately lead to termination.

11           Finally, while FE PA should absolutely increase outreach and assistance to its customers  
12 to improve universal service program participation, I question the appropriateness of permitting  
13 incremental cost recovery without the specification of targets and outcomes for its proposed  
14 activities. Robust universal service program outreach and education is a critical component of FE  
15 PA's current obligations as a public utility. I note, too, that FE PA is already committed to  
16 improving universal service program outreach and stakeholder engagement in context of the recent  
17 FE PA merger proceeding, including a specific commitment to improving targeted outreach to all  
18 LIHEAP recipients.<sup>128</sup>

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<sup>126</sup> FE PA St. 8 at 12: 1-3.

<sup>127</sup> CAUSE-PA III-25.

<sup>128</sup> Joint Application of MetEd, Penelec, Penn Power, West Penn Power, et al., Joint Petition for Approval of Settlement of All Issues, Docket Nos. A-2023-3038771 (filed Aug. 30, 2023, approved without amendment Dec. 7, 2023).

1 **Q: Do you have any recommendations related to FE PA's outreach, screening, and**  
2 **enrollment related to its universal service programs?**

3 A: Yes, I have several recommendations intended to improve outcomes. New initiatives  
4 without specific goals are insufficient, therefore my support of the EAOT is dependent on the  
5 identification and implementation of specific, measurable goals. Further, I recommend additional  
6 improvements to FE PA's universal service program outreach, screening, enrollment, and retention  
7 whether or not FE PA's EAOT is ultimately approved.

8 First, I recommend that FE PA develop quantifiable goals and a plan for achieving those  
9 goals, memorialized in an EAOT implementation plan. I recommend that FE PA develop this  
10 implementation plan through a special meeting of FE PA's USAC, where USAC members and  
11 parties to this proceeding are able to review draft plans and provide feedback and  
12 recommendations.

13 At minimum, the plan should include a commitment to achieve at least 10% annual increase  
14 in CAP enrollment rates, as measured against the number of estimated low income customers in  
15 each Rate District. Additional quantifiable targets for outreach, education, and program  
16 enrollment / retention should be established as well, with the goal of increasing engagement with  
17 and delivery of services to specific underserved populations across the full breadth of FE PA's  
18 significant geographic span in Pennsylvania. Care should be taken to identify jurisdictional  
19 differences, and to target areas with high concentrations of poverty and low relative enrollment  
20 rates. Should FE PA fail to meet identified metrics, the implementation plan should include  
21 specific commitment to review and adjust outreach activities and, if necessary, take further  
22 corrective action.

1 I recommend that FE PA be required to file its implementation plan no later than 6 months  
2 from the final order in this proceeding. FE PA should report annually thereafter on its progress in  
3 reaching the established benchmarks. Establishing these benchmarks will allow the Commission,  
4 parties, and stakeholders to gauge the success of FE PA's enrollment efforts – as well as the success  
5 of the EAOT, if approved.

6 Second, regardless of whether FE PA's EAOT is approved, I recommend that FE PA  
7 implement a routine income screening process for all applicants and customers to assess eligibility  
8 for PCAP or other universal service programs at the time service is established and during non-  
9 emergency calls or contacts with residential customers. Routine and timely income screening  
10 would not only improve referrals to PCAP, it would also help improve application of other critical  
11 income-based protections – including adherence to the statutory prohibition on security deposits  
12 for low income customers and protection from involuntary termination in the winter months.

13 While callers should have the opportunity to decline to provide income information, they  
14 should be informed that they may be eligible for a lower rate, debt forgiveness, grant assistance,  
15 or home efficiency measures. I note that it appears FE PA has some limited IVR messaging which  
16 allows customers to follow a phone prompt if they request additional information about assistance  
17 programs.<sup>129</sup> However, it does not appear that FE PA regularly screens for universal service  
18 eligibility through its live service representatives. The broad disparities in energy access and  
19 affordability faced by FE PA's low income customers requires a more proactive, prevention-based  
20 approach to affirmatively identify households eligible for rate assistance through universal service  
21 programs. Given FE's low universal service program participation rates and its high level of low  
22 income arrears and involuntary terminations, timely intervention is critical. I therefore recommend

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<sup>129</sup> CAUSE-PA III-20, Attachment AJ.

1 that, regardless of whether or not EAOT is approved, FE PA implement regular income screening  
2 for all new and moving customers, so that low income customers are routinely identified,  
3 encouraged, and assisted to enroll in in available assistance programs before debts accrue.

4 In conjunction with my recommendation to institute routine universal service program  
5 screening, I recommend that FE PA develop call scripting and checklists for its CSRs to assist in  
6 screening customers for eligibility in universal service programs, in line with my above  
7 recommendations. This will help to routinize FE PA’s enrollment efforts, ensuring low income  
8 households are enrolled and appropriately assisted from the start – not after they fall behind. All  
9 customers identified through this process should be provided a warm referral to apply for and  
10 receive assistance to enroll in FE PA’s universal service programs, without requiring  
11 the provision of duplicative information or documentation.

12 Finally, I recommend that FE PA be required to leverage LIHEAP data from the  
13 Department of Human Service (DHS) to meaningfully improve enrollment and retention in PCAP,  
14 and in turn simplifying burdensome paperwork requirements and reducing unnecessarily  
15 duplicative administrative costs. This Fall, DHS will begin sharing granular data with utilities for  
16 all LIHEAP recipients in the utility’s service territory who provide affirmative consent on the  
17 LIHEAP application for their information to be shared. The list of data points to be shared was  
18 developed through a collaborative process that included input from consumer advocates, utilities,  
19 the Commission, DHS, and other key stakeholders – inclusive of representatives from FE PA and  
20 will include all the essential information necessary to enroll in CAP.

21 I am advised by Counsel that, on June 13, 2024, the Commission issued an Order  
22 encouraging utilities to participate in the DHS data sharing program and establishing a process for

1 utilities to follow.<sup>130</sup> Specifically, the Order established a process by which utilities could file a  
2 letter with the Commission outlining how the utility will use the shared data to streamline program  
3 outreach and enrollment and/or to implement auto-recertification.<sup>131</sup> While the Commission did  
4 explicitly address utilization of LIHEAP data to support auto-enrollment, as I recommend below,  
5 it was explicit in noting that its Order encouraging adoption of streamlined outreach and  
6 enrollment and auto-recertification did not foreclose consideration of other beneficial uses for the  
7 data to improve access to a utility’s universal service programs.<sup>132</sup>

8 Further, in FE PA’s recent consolidation proceeding, FE PA agreed to utilize LIHEAP data  
9 to perform PCAP recertification wherever possible, and to make any required modification to its  
10 IT system to facilitate this streamlined auto-recertification process. FE PA agreed that all  
11 customers identified through this process will be deemed confirmed low income and able to access  
12 associated winter shutoff protections. FE PA also agreed to conducting outreach to all LIHEAP  
13 recipients identified through this data exchange who are not enrolled in PCAP to encourage PCAP  
14 enrollment.<sup>133</sup> Of note, these provisions do not require that FE PA utilize LIHEAP data to  
15 automatically enroll customers in LIHEAP, but – again – do not foreclose it.

16 In anticipation of the launch of this innovative data sharing policy, I recommend that FE  
17 PA develop a seamless, concurrent, and immediate process for utilizing shared LIHEAP data to  
18 process PCAP enrollments, without further application or paperwork. To facilitate implementation  
19 of this process and ensure robust input from stakeholders and ongoing oversight by the  
20 Commission, FE PA should be required to file a Petition within 90 days of the final order in this

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<sup>130</sup> 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Order, Docket No. M-2023-3038944, at 5 (Order dated Jun 13, 2024).

<sup>131</sup> 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Docket No. M-2023-3038944, Order (June 13, 2024), available at: <https://www.puc.pa.gov/pdocs/1833698.pdf>.

<sup>132</sup> Id. at 3 n.1.

<sup>133</sup> Joint Application for Consolidation, Joint Petition for Settlement, at Para. 47.

1 proceeding to amend its USECP to permit streamlined and concurrent PCAP enrollment. FE PA  
2 should hold at least one meeting with its USAC to obtain feedback about the details of this proposal  
3 before its Petition is filed. In its Petition, FE PA should include amended budget projections,  
4 identify a proposed process and timeframe for implementing streamlined and concurrent  
5 enrollment, and propose any necessary amendments to its USECP.

6 Implementing each of these important changes – both in tandem with and/or distinct from  
7 FE PA’s EAOT proposal – will help to meaningfully address identified enrollment and retention  
8 issues in FE PA’s universal service programs, reduce administrative costs, and simplify CAP  
9 participation for low income customers.

10 **E. Administration of Universal Service Programs**

11 **Q: Do you have any other concerns about the administration of FE PA’s universal service**  
12 **programs?**

13 A: Yes. Dollar Energy Fund (DEF) administers FE PA’s CAP and Hardship Fund  
14 programs.<sup>134</sup> As of May 3, 2024, FE PA reports 24 DEF full time staff members “available to  
15 answer consumer calls related to FE PA’s USECP Programs”; 2 subject matter experts; and ten  
16 additional new-hire representatives in training for call-handling.<sup>135</sup> I note that it is unclear whether  
17 this staff is dedicated to or merely “available to” administer FE PA’s programs. This is an  
18 important distinction, as DEF administers programs for 50 utilities across at least 18 other states.<sup>136</sup>

19 While FE PA indicates that DEF does not impose any other program requirements not set  
20 forth in FE PA’s USCEP on FE PA’s programs,<sup>137</sup> I am concerned that DEF’s policies and

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<sup>134</sup> 2024 USECP at 6, 11; 2019 USECP at USECP at 5, 10.

<sup>135</sup> CAUSE-PA III-8.

<sup>136</sup> DEF, About, [www.dollarenergy.org/about](http://www.dollarenergy.org/about).

<sup>137</sup> CAUSE-PA III-3.

1 procedures for verifying income eligibility for FE PA's programs is improperly restricting  
2 enrollment in these programs.

3 In response to discovery, FE PA provided written materials related to DEF's intake of FE  
4 PA's programs.<sup>138</sup> Included in these written materials are charts related to accepted documentation  
5 of proof of income, by income type.<sup>139</sup> It appears that DEF may be imposing requirements related  
6 to income verification which are not contemplated or discussed in FE PA's USECP, but which  
7 nevertheless impact household eligibility.<sup>140</sup>

8 I am similarly concerned that FE PA does not have a formal policy or procedure for  
9 monitoring DEF's administration of its programs.<sup>141</sup> Instead, in relation to its Hardship Fund, FE  
10 PA indicates that it expects DEF will fulfill all obligations with respect to program administration  
11 pursuant to FE PA and DEF's vendor agreement.<sup>142</sup>

12 FE PA's failure to assess administration of its universal service programs on a regular and  
13 systematic basis is a deficiency in oversight. Without regular assessment to ensure sound  
14 administration of FE PA's programs, it is impossible to accurately assess whether FE PA's  
15 programs are being administered in a manner that is compliant with program rules and parameters  
16 developed and intended by FE PA, required by Commission order, and that allows low income  
17 customers to enroll in assistance without facing unnecessarily restrictive barriers. As noted, it  
18 already appears that DEF is imposing certain restrictions on eligibility based on proof of income  
19 which may be unduly limiting a low income customer's ability to enroll in assistance. However,

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<sup>138</sup> CAUSE-PA II-5, Attachment J.

<sup>139</sup> CAUSE-PA II-5, Attachment I, J, G.

<sup>140</sup> CAUSE-PA II-5, Attachment I, J, G.

<sup>141</sup> CAUSE-PA III-5.

<sup>142</sup> Id.

1 without a regular and systematic evaluation of DEF’s administration, it is impossible to know the  
2 full scope of these issues.

3 **Q: Do you have any recommendations related to DEF’s administration of FE PA’s**  
4 **universal service programs?**

5 A: Yes. FE PA should be required to implement systematic and regular processes for  
6 monitoring and oversight of DEF’s administration of its universal service programs. First, FE PA  
7 should establish and implement clear auditing procedures for reviewing DEF-handled applications  
8 and enrollment processes as well as DEF’s policies, procedures, training, and internal guidelines  
9 and/or procedures related to administration of FE PA account. I recommend that these procedures  
10 are implemented within 6 months of the final order in this proceeding and are developed through  
11 a special meeting of FE PA’s USAC, where USAC members and all parties to this proceeding are  
12 given the opportunity to attend and provide feedback. Auditing reports should be reviewed every  
13 6 months to ensure that DEF is administering FE PA’s universal service programs in compliance  
14 with Commission order and directive, and as intended by FE PA.

15 **VII. CUSTOMER SERVICE ISSUES**

16 **A. Customer Notices and Communications**

17 **Q: Please briefly describe the customer service issues you would like to address in the**  
18 **context of this case.**

19 A: I am concerned that FE PA’s notices to its residential customers do not accurately reflect  
20 medical certificate requirements set forth by statute and Commission regulation.



1 **Q: Do you have any recommendations related to improving FE PA’s medical certificate**  
2 **language in its notices?**

3 A: Yes. I recommend that FE PA be required to undertake a review of all customer notices  
4 and communications, and to make revisions to language related to medical certificate requirements  
5 throughout these notices and other communications. Revised language should reflect accurate  
6 requirements as required by law. These revisions should be filed with the Commission as a  
7 compliance filing to which parties can respond at this docket no later than 3 months from the final  
8 order in this proceeding.

9 I note that FE PA provided a number of notices and customer communications in response  
10 to discovery. While I will be discussing a number of concerns related to these documents, I reserve  
11 the right to also address concerns raised by other parties in subsequent stages of my testimony.

12 **Q: Do you have any other concerns you would like to raise herein related to FE PA’s**  
13 **customer communications?**

14 A: Yes. I am concerned that FE PA is not adequately engaging with limited English proficient  
15 (LEP) customers and providing LEP customers with essential information related to their services.

16 A substantial number of FE PA’s customers are likely LEP, and their needs must be  
17 considered and provided for when determining whether FE PA’s customers can reasonably access  
18 and stay connected to services. According to the Migration Policy Institute, Pennsylvania’s LEP  
19 population has increased by 115.8%.<sup>145</sup> In addition, amongst the 12,303,274 total household  
20 population (age 5 and older) reported as of 2022, 694,720 were reported as Spanish-speaking and

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<sup>145</sup> Migration Policy Institute, Pennsylvania, available at: <https://www.migrationpolicy.org/data/state-profiles/state/language/PA>. Measuring increase in foreign-born LEP. For US born LEP there has been a 13.8% growth between 2000 and 2022.

1 302,763 were classified as LEP.<sup>146</sup> Hundreds of thousands of other Pennsylvanians report to be  
2 LEP, with their preferred language other than Spanish.<sup>147</sup>

3 FE PA indicates that telephonic interpretation services are available at any time when the  
4 customer call center is open.<sup>148</sup> However, it appears that FE PA’s policies and procedures related  
5 to customer contacts by FE PA field representatives does not provide for important translation and  
6 interpretation services for customers. In response to discovery FE PA provided field representative  
7 contact guidelines,<sup>149</sup> 2023-2024 winter collection guidelines for field representatives,<sup>150</sup> and 2024  
8 non-moratorium season guidelines for field representatives.<sup>151</sup> These documents contain only one  
9 provision for LEP customers – a handout related to assistance programs in English/Spanish.<sup>152</sup> I  
10 am concerned that without policies, procedures, and guidelines related to field representatives  
11 contacts and communications with LEP customers, LEP customers are not adequately informed of  
12 critically important information – including information about imminent terminations and how to  
13 maintain or restore services. I am similarly concerned that without clear policies and procedures  
14 for field representatives related to LEP customers, FE PA’s field representatives may have to resort  
15 to ad hoc methods of translation – including communications with or through other members of  
16 the household. Communicating essential information – including information about utility  
17 termination, medical status, and domestic violence status – should never have to go through  
18 members of households, which often include minors. Children should not be used as a conduit for

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<sup>146</sup> Migration Policy Institute, Pennsylvania, available at: <https://www.migrationpolicy.org/data/state-profiles/state/language/PA>.

<sup>147</sup> *Id.*

<sup>148</sup> CAUSE-PA III-28, Attachment A.

<sup>149</sup> CAUSE-PA III-2, Attachment A.

<sup>150</sup> CAUSE-PA III-2, Attachment B.

<sup>151</sup> CAUSE-PA III-2, Attachment C.

<sup>152</sup> CAUSE-PA III-2, Attachment C, at 8.

1 information about a customer's account. Rather, FE PA must ensure that field representatives are  
2 empowered with robust tools so that they can communicate vital information with LEP customers.

3 **Q: Do you have any recommendations to improve FE PA's policies and procedures**  
4 **related to field representative communication with LEP customers?**

5 A: Yes. I recommend that FE PA be directed to undertake a full review of the policies,  
6 procedures, and attendant training materials, to ensure that FE PA's field representatives are  
7 provided with clear and robust directions for how to communicate with LEP customers. These  
8 revised provisions should include, whenever a field representative is not fluent in the customer's  
9 preferred language, how the field representative can access telephone-based interpretation services  
10 utilized by FE PA. These revisions should be filed with the Commission as a compliance filing to  
11 which parties can respond at this docket no later than 3 months from the final order in this  
12 proceeding.

13 **B. Winter Moratorium on Termination**

14 **Q: The Public Utility Code prohibits termination of households with income at or below**  
15 **250% FPL between December 1<sup>st</sup> to March 31<sup>st</sup>. Do you have any concerns related to FE**  
16 **PA's application of this moratorium on winter terminations?**

17 A: Yes. I am concerned that FE PA appears to terminate confirmed low income customers for  
18 nonpayment during the winter moratorium. Section 1406(e) of the Public Utility Code and section  
19 56.100 of the Commission's regulations prohibits electric and natural gas distribution utilities from  
20 terminating service to customers with household incomes at or below 250% FPL between

1 December 1 and March 31, except in certain cases of unauthorized use, fraud, tampering, or tariff  
2 violations or if otherwise explicitly authorized by the Commission.<sup>153</sup>

3 Despite these statutory and regulatory requirements, FE PA reports that it terminated  
4 sizable numbers of confirmed low income customers for nonpayment during the winter months  
5 from 2022 to 2024<sup>154</sup>:

- 6 • January 2022 – 7
- 7 • Feb. 2022 – 23
- 8 • March 2022 – 29
- 9 • December 2022 – 7
- 10 • Jan. 2023 – 22
- 11 • Feb. 2023 – 13
- 12 • March 2023 – 19
- 13 • Dec. 2023 – 15
- 14 • Jan. 2024 – 9
- 15 • Feb. 2024 – 21
- 16 • March 2024 – 58

17 In total, between January 2022 and March 2024, FE PA reports that 223 confirmed low income  
18 customers were terminated for nonpayment during the winter moratorium.<sup>155</sup>

19 As previously discussed, FE PA’s definition of confirmed low income customers is far  
20 more narrow than the Commission’s definition, and is limited to households with income at or  
21 below 150% FPL – much lower than the income threshold that applies for the winter moratorium.  
22 I am concerned that FE PA is likely terminating hundreds of additional households with income  
23 between 151-250% FPL, contrary to the statutory and regulatory prohibition.

24 It is unclear why FE PA is terminating confirmed or any low income customers during the  
25 winter moratorium period. However, these terminations appear to contravene PA’s statutory and

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<sup>153</sup> 66 Pa. C.S. § 1406(e); 52 Pa. Code § 56.100.

<sup>154</sup> CAUSE-PA I-16, Attachment C.

<sup>155</sup> Id.

1 regulatory requirements. Counsel for CAUSE-PA has advised me that this issue requires certain  
2 legal analyses which Counsel reserves for briefing. That said, I recommend that FE PA be required  
3 to immediately revise its policies and procedures so that all customers with income at or below  
4 250% FPL receive protection from termination for nonpayment during the Winter Moratorium as  
5 required by law.

6 **Q: Do you have any recommendations to improve FE PA’s policies and procedures**  
7 **related to identification of confirmed low income customers?**

8 A: Yes. As discussed at length above, I note here that the definition currently utilized by FE  
9 PA is far more restrictive than the Commission’s definition of the term “confirmed low income  
10 customer.” I recommend that FE PA adopt a consistent, broader definition of confirmed low  
11 income customers consistent with the Commission’s regulation 62.2, including any information  
12 provided by the customer that reasonably places the customer in a low income category<sup>156</sup> as well  
13 as:

- 14 • Enrollment or participation in a universal service or energy conservation
- 15 program (PCAP, LIURP, Hardship Fund, or CARES).
- 16 • Receipt of a cash or crisis LIHEAP grant.
- 17 • Receipt of a other emergency utility assistance.
- 18 • Indication by the customer of inability to pay current bill and/or requests for
- 19 income based payment arrangements.
- 20 • Contact immediately prior to termination.
- 21 • CARES contacts and other referrals to low income programs.
- 22 • Self-certification by the customer.
- 23 • Income information received based on request for a medical certificate.

24 Further, because the prohibition on winter termination applies to customers with income up to  
25 250% FPL, FE PA should be required to further develop policies to improve identification of  
26 households with income between 150-250% FPL.

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<sup>156</sup> See infra Section III.

1 **C. Low Income Security Deposit Prohibition**

2 **Q: You previously indicated that FE PA’s methods of tracking confirmed low income**  
3 **customers detrimentally impacts the ability of customers to access certain other protections,**  
4 **such as the exemption of low income customers from collection of security deposits. Why?**

5 A: Section 56.32(e) of the Commission’s regulations prohibits utilities from collecting  
6 security deposits from customers who are confirmed to be income eligible for its customer  
7 assistance programs.

8 The Commission has issued explicit guidance on this issue and was clear that a low income  
9 household does not need to enroll in CAP or another universal service program for the prohibition  
10 on security deposits to apply.<sup>157</sup> In its Attachment A to its Ch. 56 Rulemaking Order, the  
11 Commission clarified that the prohibition on collecting security deposits from low income  
12 customers is “referring to eligibility based upon the customer’s household income – *not on other*  
13 *miscellaneous eligibility criteria that can vary by utility.*”<sup>158</sup> The Commission also stated:

14 Regarding the concerns expressed about this same section by LICRG that it is  
15 eligibility and not actual enrollment into CAP that determines the customer’s  
16 exemption from deposit requirements, we agree and point out that ***this section***  
17 ***specifies “eligible,” not “enrolled” or “participating.”*** We think this language is  
18 sufficient direction that the customer only has to be “eligible” and not actually  
19 enrolled in CAP to be exempt from a deposit request.<sup>159</sup>

20 The Commission also requires both verbal notice of the exemption to be provided to applicants  
21 and customers *at the time the security deposit is assessed*, as well as instructions for how the  
22 applicant or customer can verify income.<sup>160</sup>

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<sup>157</sup> 52 Pa. Code § 56.32(e).

<sup>158</sup> Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C.S. Ch. 14, L-2015-2508421, Final Rulemaking Order, Attach. One at 48 (Feb. 28, 2019).

<sup>159</sup> Id. (emphasis added).

<sup>160</sup> Id.; see also 52 Pa. Code §§ 56.36, 56.286.



1 based on actual costs during its next base rate proceeding. As CAUSE-PA’s expert witness,  
2 Mitchell Miller, explained in the context of this remote involuntary termination proceeding, FE  
3 PA’s predecessor Companies have maintained their reconnection fees since the 1990s, and are not  
4 reasonably reflective of the cost to complete terminations/ reconnections.<sup>162</sup>

5 FE PA proposes a reconnection fee across its Rate Districts of \$15.<sup>163</sup> As shown by Exhibit  
6 MSK-4, FE PA appears to have analyzed reconnection cost data between October 2022 and  
7 September 2023, which includes care center reconnection costs; costs per tech billing employee  
8 per exception; and reconnect costs (inclusive of total dunning unblock at meter and reconnect at  
9 poles).<sup>164</sup> FE indicates that this proposed reconnection fee was calculated utilizing all customers  
10 (as opposed to solely residential customers), but that its calculation did not change for solely  
11 residential customers.<sup>165</sup>

12 **Q: Do you support FE PA’s proposal to reduce its reconnection fee to \$15?**

13 A: No. While a reconnection fee reduction may appear on its face to be a benefit for  
14 residential consumers, the imposition of any reconnection fee presents a substantial barrier to  
15 reconnection for low income customers. As discussed, FE PA’s confirmed low income and  
16 PCAP customers are terminated for nonpayment at far greater rates compared to residential  
17 customers as a whole. Adding insult to injury, FE PA’s low income customers, once terminated,  
18 are less likely to be able to reconnect to service compared to residential customers as a whole:

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<sup>162</sup> FirstEnergy Petition for Approval of Their Involuntary Remote Disconnect Procedures, CAUSE-PA St. 1, Docket Nos. P-2019-3013979 (CAUSE-PA St. 1 at 13-14).  
<sup>163</sup> FE PA St. 6 at 15: 1-5.  
<sup>164</sup> Exhibit MSK-4  
<sup>165</sup> CAUSE-PA IV-2, Attachment A.

1 **Table 17: Reconnections and Reconnection Rates, CLI v. R (2021, 2022)<sup>166</sup>**

	2021				2022			
	Reconnect. Res.	Rate Res.	Reconnect. CLI	Rate CLI	Reconnect. Res.	Rate Res.	Reconnect. CLI	Rate CLI
<b>Met-Ed</b>	23,842	88.5%	10,467	80.5%	25,389	88.0%	10,787	75.3%
<b>Penelec</b>	16,094	79.1%	8,128	72.5%	16,268	79.4%	7,666	66.5%
<b>PP</b>	1,844	76.3%	856	68.6%	2,473	76.2%	1,118	63.2%
<b>WPP</b>	12,882	79.8%	5,913	72.3%	17,148	81.6%	7,245	67.6%

2  
3 As Table 17 above shows, confirmed low income customers reconnect at lower rates  
4 compared to residential customers as a whole. For example, the difference in the reconnection  
5 rates between confirmed low income and residential customers as a whole across all FE PA rate  
6 districts ranged between 6.6% - 8% in 2021, and 12.7% - 14%. These are significant disparities  
7 and underscore the difficulties that FE PA’s low income customers face in reconnection to  
8 services.

9 According to FE PA’s current USECP, in order to restore service, a terminated FE PA  
10 customer enrolled in PCAP must first pay the full balance to bring their PCAP bill current **and** a  
11 reconnection fee.<sup>167</sup> Requiring payment of PCAP bills to current, in addition to a reconnection fee,  
12 can compound already severe financial hardship faced by low income households. A customer  
13 who has their utility service terminated for nonpayment is unlikely to be able to pay a reconnection  
14 fee in addition to the debt that led to termination.

15 Reconnection fees pose a substantial and punitive barrier for low income customers to  
16 reestablish services. It is unjust and unreasonable to continue to penalize low income customers  
17 for not being able to pay bills that they cannot afford to pay, terminating service based on

<sup>166</sup> 2022 Universal Service Report, at 17-18, available at: <https://www.puc.pa.gov/filing-resources/reports/universal-service-programs-and-collections-performance-reports/>.

<sup>167</sup> 2019 USECP at 15. 2024 USECP at 14.

1 nonpayment of those charges, and ultimately adding even more charges to the bill for  
2 reconnection.

3 **Q: Do you have any recommendations related to FE PA’s reconnection fees for**  
4 **residential customers?**

5 A: Yes. I recommend that the Commission require FE PA to waive reconnection fees for all  
6 confirmed low income customers. As discussed, FE PA’s low income customers are terminated  
7 for nonpayment at far higher rates compared to residential customers as a whole, and  
8 correspondingly incur reconnection fees at greater rates as a result of these disparate termination  
9 rates. Eliminating reconnection fees in their entirety for confirmed low income customers will  
10 alleviate the additional barrier that low income customers face when seeking to reconnect their  
11 services, and make it easier for these households to maintain essential utility services in their  
12 homes. Eliminating reconnection fees for confirmed low income customers also helps ensure that  
13 payments that confirmed low income customers can make towards their FE PA accounts are  
14 utilized to reduce their balances to help these customers stay connected to services.

15 **VIII. EV PILOT**

16 **Q: Please briefly summarize the Company’s proposed Electric Vehicle (EV) Pilot.**

17 A: FE PA indicates that the EV Pilot is intended to educate customers about EVs and  
18 encourage them to adopt EVs by providing incentives and expanding access to EV charging in FE  
19 PA’s service territory.<sup>168</sup> The EV Pilot would contain 2 program: (1) and education and awareness

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<sup>168</sup> FE PA St. 8 at 13.

1 program; and (2) an incentive/ rebate program.<sup>169</sup> The education and awareness program would  
2 provide:<sup>170</sup>

- 3 • an online EV education platform;
- 4 • a grant assistance component to provide financial support to local government entities,  
5 school boards, transit authorities, and qualifying nonprofit organizations related to  
6 professional grant applications for government funding related to EVs;
- 7 • a fleet advisory program to aid commercial and municipal fleets with their electrification  
8 transition;
- 9 • a dealership toolkit program, which would fund kiosks located at dealerships within the  
10 service territory that will provide remote concierge services to help education customer  
11 related to EV purchases.

12 The total costs of the education and awareness program would be \$3,480,000 annually.<sup>171</sup>

13 The incentive/ rebate program would have three components: a residential component, a  
14 nonresidential component, and a DC fast charger component.<sup>172</sup> The residential component would  
15 offer a rebate for installation of level 2 EV supply equipment by a licensed electrician in the  
16 amount of \$500/ residence.<sup>173</sup> The nonresidential component would be available to government  
17 agencies, nonprofit entities, workplaces, multi-unit dwellings, and commercial publicly available  
18 locations.<sup>174</sup> This program component would include 2 sets of rebates – a customer-side make-  
19 ready rebate and a utility-make ready rebate. The customer-side make-ready rebate would

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<sup>169</sup> FE PA St. 8 at 13-14.

<sup>170</sup> FE PA St. 8 at 14-15.

<sup>171</sup> FE PA St. 8 at 15.

<sup>172</sup> FE PA St. 8 at 15.

<sup>173</sup> Id.

<sup>174</sup> FE PA St. 8 at 15-16.

1 reimburse qualifying customers for costs associated with EV supply equipment and electrical work  
2 needed on the customer side of the meter.<sup>175</sup> Rebate amounts would be capped at the lesser of  
3 \$2,000/ charging port or 75% of the qualifying costs. For customers in environmental justice areas  
4 (as defined by the Pa. Department of Environmental Protections), the cap would be the lesser of  
5 \$3,000/ charging port or 75% of the qualifying costs.<sup>176</sup>

6 The fast charging rebate component would be available to government agencies and  
7 nonprofit entities installing DC fast chargers with minimum charging capabilities of 50 kilowatts/  
8 port.<sup>177</sup> Qualifying costs would include EV supply equipment, customer-side make-ready  
9 expenses, and utility construction cost billed to customers as contributions in aid of construction.<sup>178</sup>  
10 Rebate amounts would be capped at \$25,000/ port with an aggregate cap of \$50,000/ site.<sup>179</sup>

11 **Q: How does the Company propose to recover the costs associated with the EV Pilot?**

12 A: FE PA proposes a total program allowance of \$2 million annually for the residential rebate  
13 component and \$2 million annual for the combined nonresidential and DC fast charging rebate  
14 components.<sup>180</sup> FE PA proposes that expenses will be tracked by revenue classes through base  
15 rates, will be charged directly to the revenue classes benefiting from the programs, and allocated  
16 across rate districts based on the rate district's proportional total customers by class at the FE PA  
17 level.<sup>181</sup>

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<sup>175</sup> FE PA St. 8 at 16.

<sup>176</sup> Id.

<sup>177</sup> Id.

<sup>178</sup> Id.

<sup>179</sup> Id.

<sup>180</sup> Id.

<sup>181</sup> FE PA St. 8 at 17.

1 **Q: Do you have any concerns about FE PA’s EV Pilot proposal?**

2 A: Yes, I have a number of concerns. I am generally supportive of equitable electrification  
3 initiatives. I am also cognizant that there has been a movement to encourage EV adoption, both  
4 nationwide and within the Commonwealth. For example, the U.S. Department of Transportation  
5 has set a goal to build a network of half a million fast-charging stations nationwide by 2030, and  
6 the Biden administration has announced a goal of having 50% of all new vehicle sales be electric  
7 by 2030.<sup>182</sup> Pennsylvania’s EV mobility plan similarly recommends supporting the installation of  
8 at least 5,000 new EV charging ports at 2,000 sites by 2028.<sup>183</sup> At the same time, EV sales have  
9 expanded considerably, with EV sales in the U.S. increasing approximately 60% year over year  
10 from 1 million in 2022 to 1.6 million in 2023.<sup>184</sup>

11 I am concerned that low income households are not equitably able to access EVs and  
12 transportation electrification, and will therefore be unable to realize the benefits from FE PA’s EV  
13 Pilot proposal. In my experience, purchasing an EV is not an affordable or feasible option for the  
14 average low income household. A family of four at 150% FPL makes just \$46,800 per year. At  
15 this income level, families struggle to afford public transit options, let alone a afford to purchase  
16 and maintain an EV. The Kelly Blue Book estimate of the average transactional price nationwide  
17 of EVs in April 2024 was \$54,021.<sup>185</sup> While FE PA indicates that the average cost of used EV’s  
18 nationwide continues to fall, as of the second quarter of 2024, FE PA reports that used EV sales

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<sup>182</sup> White House, [FACT SHEET: Biden-Harris Administration Announces New Private and Public Sector Investments for Affordable Electric Vehicles](https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/17/fact-sheet-biden-harris-administration-announces-new-private-and-public-sector-investments-for-affordable-electric-vehicles/), available at: <https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/17/fact-sheet-biden-harris-administration-announces-new-private-and-public-sector-investments-for-affordable-electric-vehicles/>; PennDOT, [Electric Vehicles and Alternative Fuels](https://www.penndot.pa.gov/ProjectAndPrograms/Planning/EVs/Pages/default.aspx), available at: <https://www.penndot.pa.gov/ProjectAndPrograms/Planning/EVs/Pages/default.aspx>.

<sup>183</sup> PennDOT, Pa.’s [Electric Vehicle Mobility Plan](https://www.penndot.pa.gov/ProjectAndPrograms/Planning/EVs/Pages/EV-Mobility-Plan.aspx), available at: <https://www.penndot.pa.gov/ProjectAndPrograms/Planning/EVs/Pages/EV-Mobility-Plan.aspx>.

<sup>184</sup> MarketWatch, [EV Vehicle Statistics 2024](https://www.marketwatch.com/guides/insurance-services/electric-vehicle-statistics-2024/), available at: <https://www.marketwatch.com/guides/insurance-services/electric-vehicle-statistics-2024/>.

<sup>185</sup> CAUSE-PA III-14.

1 range between \$23,787 to \$51,616.<sup>186</sup> Thus, the cost of EVs appears to sit around – or above – the  
2 gross annual income of many low income families, even without the costs of maintenance,  
3 registration, insurance, and other associated costs involved with owning electric vehicles.

4 As a practical matter, FE PA’s low income customers are unlikely to see any direct benefit  
5 from FE PA’s incentive/ rebate program proposals – even with an enhanced rebate. Low income  
6 customers are most often unable to access rebates due to insurmountable upfront costs related to  
7 EV, and associated make-ready requirements. I note, too, that FE PA’s rebate proposals focused  
8 on residential customers do not provide any detail about how braiding and staking of federal and  
9 state funding assistance and opportunities may be leveraged to address the affordability gaps for  
10 consumers, or to help reduce the cost to ratepayers. It is essential that initiatives aimed at  
11 transportation electrification provide a clear and direct benefit to low income customers that  
12 promote sustainable community growth and stability – especially when low income consumers are  
13 expected to share in the cost.

14 With low income consumers having these significant barriers to personal EV adoptions, it  
15 is essential that transportation electrification initiatives focus on public and fleet transportation in  
16 low income and environmental justice communities.<sup>187</sup> As discussed, low income and historically  
17 disadvantaged communities face disproportionate and steep barriers to transportation  
18 electrification adoption. Furthermore, low income communities and communities of color have  
19 traditionally faced substantially higher costs for transportation, and are more likely to live in close

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<sup>186</sup> CAUSE-PA III-15, Attachment A.

<sup>187</sup> EJ communities – which are disproportionately low income communities and communities of color – experience the compounding harm of economic and environmental inequity and injustice. These communities often live closer to mass transit, power plants, and other industrial sites, and their homes are often older and have little insulation, drafty windows and doors, and poor ventilation. As a result, people who reside in EJ Areas are most likely to be exposed to harmful emissions and other environmental pollutants both inside and outside of their homes which exacerbates negative health outcomes. See Cheryl Katz, People in Poor Neighborhoods Breathe More Hazardous Particles, Scientific American (Nov. 2012), available at: <https://www.scientificamerican.com/article/people-poor-neighborhoods-breatemore-hazardous-particles/>.

1 proximity to mass transportation hubs and high volume transportation.<sup>188</sup> Fleet transportation  
2 initiatives help to ensure that low income households and their communities can realize benefits  
3 from transportation electrification initiatives, and work to dismantle the historical barriers to  
4 transportation electrification faced by these communities.

5 As currently structured, I am concerned that FE PA's proposed EV pilot components  
6 related to nonresidential entities does not provide needed specificity to ensure that benefits are  
7 committed to and realized by low income households and their communities. For example, while  
8 the make-ready rebate allows for a slightly higher cap (\$3,000 v \$2,000) for customers in  
9 Environmental Justice (EJ) areas, there is no indication to what extent the EV Pilot, if approved,  
10 would specifically target low income or EJ communities. It is therefore impossible to determine  
11 whether and to what extent FE PA's low income customers and their communities will derive  
12 benefits from the EV Pilot proposal, if approved. It similarly appears that FE PA has not adequately  
13 analyzed access, and barriers to access, related to EVs and transportation electrification. FE  
14 indicates that it has not conducted or commissioned an assessment on the adoption or sales of EVs  
15 amongst low income households.<sup>189</sup>

16 Overall, if FE PA's EV Pilot is ultimately approved, modification must be made to ensure  
17 that low income consumers and their communities can realize meaningful and direct benefits from  
18 these initiatives. This is particularly important as FE PA proposes that low income customers will  
19 share in the responsibility of shouldering the costs of these initiatives.

20 **Q: Do you have any recommendations related to FE PA's EV Pilot proposal?**

21 A: Yes. As discussed, low income customers are simply not able to meaningfully and  
22 equitably participate in the current EV market due to the steep upfront costs of EV ownership. I

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<sup>188</sup> U.S. DOT, Health and Equity, available at: <https://www.transportation.gov/mission/health/health-equity>.

<sup>189</sup> CAUSE-PA III-16, 11, 13, 12.

1 therefore recommend that, if the EV Pilot is approved, FE PA’s confirmed low income customers  
2 should be excluded from paying for the costs of the EV Pilot Proposal.

3 I also recommend that FE PA be required to devote at least 50% of the fleet and public  
4 transportation incentives to entities situated in or that primarily service EJ communities. Devoting  
5 at least half of these program components towards EJ communities would help address historical  
6 inequities in access to advanced energy technology, and better ensure that low income customers  
7 are able to derive some benefit from these initiatives.

8 **IX. SUMMARY OF RECOMMENDATIONS AND CONCLUSION**

9 **Q: Please summarize your recommendations set forth in your direct testimony?**

10 A: In my direct testimony, I made several recommendations to address current unaffordability  
11 and mitigate the financial impact of any proposed rate increase on low income households. I  
12 recommend the Commission order the following:

13 Rate Design

- 14 • Reject FE PA’s proposal to increase its fixed monthly customer charge. To the extent that  
15 any increase in the Company’s residential distribution rates is approved, it should be  
16 applied to the volumetric charge.
- 17 • Deny FE PA’s proposal related to recovery of uncollectible account expenses related to  
18 potential future amendments to Chapter 14 in its entirety.

19 PCAP

- 20 • As of the effective date of rates, require FE PA to review and adjust PCAP rates based on  
21 the new applicable residential rates to ensure all PCAP customers are receiving the most  
22 advantageous CAP rate available.
- 23 • Require FE PA to implement all approved changes to FE PA’s PCAP that are not impacted  
24 by the narrow pending Commission review.
- 25 • To the extent FE PA’s current PCAP design is still in place as of the effective date of rates  
26 in this proceeding, require FE PA adjust its maximum CAP credit limits in two stages.

- 1           ○ First, FE PA should adjust its current CAP credit limits to an amount necessary to  
2           ensure that at least 95% of its PCAP participants in each rate district through the  
3           prior program year would have received adequate credits necessary to ensure their  
4           bills would not exceed applicable energy burden standards.
- 5           ○ Second, FE PA should further adjust CAP credit limits by a percentage equal to any  
6           approved rate increase in this proceeding.

7    Hardship Fund

- 8           ● Require FE PA to:
  - 9           ○ Increase its annual hardship funding available for grant assistance to \$1 million.
  - 10          ○ Explore how to improve solicitation of donations through e-billing – including  
11          round-up and add-a-buck programs.
  - 12          ○ Consider a plan to solicit voluntary contributions from the larger commercial and  
13          industrial entities within its service territory, which do not currently contribute any  
14          funds to support universal service programs through rates.
  - 15          ○ Consult with its USAC and develop a plan to increase voluntary contributions to its  
16          Hardship Fund grant, with a report being provided to the Commission within 6  
17          months of a final order in this proceeding.
  - 18          ○ Adopt explicit exemptions to its upfront payment requirements, as outlined above  
19          -- and work with DEF to update its customer facing materials to reflect this changed  
20          policy without delay.
    - 21                ■ If a customer meets all the required eligibility criteria for FE PA’s Hardship  
22                Fund, they should be able to receive a Hardship Fund grant without upfront  
23                payment.
  - 24          ○ Amend its seasonal parameters for its Hardship Fund so that, at minimum,  
25          customers whose electric service is off or *who are at risk of termination* can qualify  
26          for a Hardship Fund grant.
  - 27          ○ Eliminate any prohibitions against PCAP customers receiving a Hardship Fund  
28          grant -- and work with DEF to update its customer facing materials to reflect this  
29          changed policy without delay.
  - 30          ○ Increase its maximum grant amount from \$500 to \$600.

31   LIURP

- 32          ● Require FE PA to:

- 1           ○ Increase its LIURP annual budget by a percentage equal to any approved increase  
2           in residential rates in this proceeding, allocated proportionally amongst FE PA's  
3           Rate Districts.
- 4           ○ Continue to carryover any unspent WARM funds from a previous program year  
5           and add it to the budget for the following year.
- 6           ○ Improve efforts to proactively coordinate delivery of services with other local, state,  
7           and federal efficiency, weatherization, and home repair programs that can help  
8           remediate health, safety, and other home repair issues that prevent the installation  
9           of comprehensive efficiency measures and cannot be resolved through FE PA's  
10          health and safety budget alone.
- 11                 ▪ FE PA should host a series of collaborative meetings with members of its  
12                 USAC, as well as local weatherization and home repair program  
13                 administrators across its service territory, to identify concrete ways to  
14                 leverage and coordinate LIURP with home repair and weatherization  
15                 programs across its service territory.
- 16          ○ Within six months of a final order in this rate case, FE PA should provide the  
17          Commission and its USAC with a report that addresses the topic outlined above.

18    Universal Service Screening, Enrollment, and Retention

- 19          • Require FE PA to:
  - 20                 ○ Develop quantifiable goals and a plan for achieving those goals, memorialized in  
21                 an EAOT implementation plan.
  - 22                         ▪ FE PA should develop this implementation plan through a special meeting  
23                         of FE PA's USAC, where USAC members and parties to this proceeding  
24                         are able to review draft plans and provide feedback and recommendations.
  - 25                         ▪ At minimum, the plan should include a commitment to achieve at least 10%  
26                         annual increase in CAP enrollment rates, as measured against the number  
27                         of estimated low income customers in each Rate District, and the additional  
28                         parameters outlined above.
  - 29                         ▪ FE PA should be required to file its implementation plan no later than 6  
30                         months from the final order in this proceeding.
  - 31                                 • FE PA should report annually thereafter on its progress in reaching  
32                                 the established benchmarks.
  - 33                 ○ Regardless of whether FE PA's EAOT is approved, implement a routine income  
34                 screening process for all applicants and customers to assess eligibility for PCAP or  
35                 other universal service programs at the time service is established and during non-  
36                 emergency calls or contacts with residential customers.

- 1                   ▪ FE PA should also be required to develop call scripting and checklists for  
2                   its CSRs to assist in screening customers for eligibility in universal service  
3                   programs, in line with my above recommendations. All customers identified  
4                   through this process should be provided a warm referral to apply for and  
5                   receive assistance to enroll in FE PA’s universal service programs, without  
6                   requiring the provision of duplicative information or documentation.

- 7                   ○ Leverage LIHEAP data from the Department of Human Service (DHS) to  
8                   meaningfully improve enrollment and retention in PCAP, and in turn simplifying  
9                   burdensome paperwork requirements and reducing unnecessarily duplicative  
10                  administrative costs.

- 11                  ▪ Develop a seamless, concurrent, and immediate process for utilizing shared  
12                  LIHEAP data to process PCAP enrollments, without further application.

- 13                         • FE PA should be required to file a Petition within 90 days of the  
14                         final order in this proceeding to amend its USECP to permit  
15                         streamlined and concurrent PCAP enrollment.
- 16                         • FE PA should hold at least one meeting with its USAC to obtain  
17                         feedback about the details of this proposal before its Petition is filed.
- 18                         • In its Petition, FE PA should include amended budget projections,  
19                         identify a proposed process and timeframe for implementing  
20                         streamlined and concurrent enrollment, and propose any necessary  
21                         amendments to its USECP.

22    Administration of Universal Service Programs

- 23                  • Require FE PA to:
  - 24                         ○ Implement systematic and regular processes for monitoring and oversight of DEF’s  
25                         administration of its universal service programs, as outlined.
    - 26                                 ▪ These procedures should be implemented within 6 months of the final order  
27                                 in this proceeding and are developed through a special meeting of FE PA’s  
28                                 USAC, where USAC members and all parties to this proceeding are given  
29                                 the opportunity to attend and provide feedback.
    - 30                                 ▪ Auditing reports should be reviewed every 6 months to ensure that DEF is  
31                                 administering FE PA’s universal service programs in compliance with  
32                                 Commission order and directive, and as intended by FE PA.

33    Medical Certificates

- 34                  • Require FE PA to:

- 1           ○ Undertake a review of all customer notices and communications, and to make  
2           revisions to language related to medical certificate requirements throughout these  
3           notices and other communications.
- 4                   ▪ Revised language should reflect accurate requirements as required by law.
- 5                   ▪ These revisions should be filed with the Commission as a compliance filing  
6                   to which parties can respond at this docket no later than 3 months from the  
7                   final order in this proceeding.

8    Language Access

- 9    • Require FE PA to:
  - 10    ○ Undertake a full review of the policies, procedures, and attendant training materials, to  
11    ensure that FE PA’s field representatives are provided with clear and robust directions for  
12    how to communicate with LEP customers.
  - 13           ▪ These revised provisions should include, whenever a field representative is not  
14           fluent in the customer’s preferred language, how the field representative can access  
15           telephone-based interpretation services utilized by FE PA.
  - 16           ▪ These revisions should be filed with the Commission as a compliance filing to  
17           which parties can respond at this docket no later than 3 months from the final order  
18           in this proceeding.

19   Winter Moratorium Protections

- 20   • Require FE PA to:
  - 21    ○ Immediately revise its policies and procedures so that all customers with income at or  
22    below 250% FPL receive protection from termination for nonpayment during the Winter  
23    Moratorium as required by law.
  - 24    ○ Adopt a consistent, broader definition of confirmed low income customers consistent with  
25    the Commission’s regulation 62.2, as outlined above.
  - 26           ▪ Because the prohibition on winter termination applies to customers with income up  
27           to 250% FPL, further develop policies to improve identification of households with  
28           income between 150-250% FPL.

29   Security Deposit Prohibitions

- 30   • Require FE PA to:
  - 31    ○ Apply the security deposit exemption in all circumstances where a customer has indicated  
32    low income status – as discussed above. Develop an automated process to immediately  
33    refund all security deposits held for customers which meet the definition of “confirmed

1 low income customer” under section 54.72, consistent with the discussion of this term,  
2 above.

3 Reconnection Fees

- 4 • Require FE PA to waive reconnection fees for all confirmed low income customers.

5 EV Pilot Proposal

- 6 • Exclude FE PA’s confirmed low income customers from paying for the costs of the EV  
7 Pilot Proposal.
- 8 • Require FE PA to devote at least 50% of the fleet and public transportation incentives to  
9 entities situated in or which primarily service Environmental Justice communities.

10  
11 **Q: Does this conclude your direct testimony?**

12 **A: Yes.**

# CAUSE-PA Exhibit 1(a)

## Met-Ed Energy Burden, Current and Proposed Residential Rates

4 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 15,600	\$ 102.47	\$ 1,229.64	8%	\$ 114.09	\$ 1,369.08	9%
100% FPL	\$ 31,200	\$ 102.47	\$ 1,229.64	4%	\$ 114.09	\$ 1,369.08	4%
150% FPL	\$ 46,800	\$ 102.47	\$ 1,229.64	3%	\$ 114.09	\$ 1,369.08	3%
200% FPL	\$ 62,400	\$ 102.47	\$ 1,229.64	2%	\$ 114.09	\$ 1,369.08	2%
<b>800 kWh</b>							
50% FPL	\$ 15,600	\$ 132.88	\$ 1,594.56	10%	\$ 147.28	\$ 1,767.36	11%
100% FPL	\$ 31,200	\$ 132.88	\$ 1,594.56	5%	\$ 147.28	\$ 1,767.36	6%
150% FPL	\$ 46,800	\$ 132.88	\$ 1,594.56	3%	\$ 147.28	\$ 1,767.36	4%
200% FPL	\$ 62,400	\$ 132.88	\$ 1,594.56	3%	\$ 147.28	\$ 1,767.36	3%
<b>1000 kWh</b>							
50% FPL	\$ 15,600	\$ 163.29	\$ 1,959.48	13%	\$ 180.48	\$ 2,165.76	14%
100% FPL	\$ 31,200	\$ 163.29	\$ 1,959.48	6%	\$ 180.48	\$ 2,165.76	7%
150% FPL	\$ 46,800	\$ 163.29	\$ 1,959.48	4%	\$ 180.48	\$ 2,165.76	5%
200% FPL	\$ 62,400	\$ 163.29	\$ 1,959.48	3%	\$ 180.48	\$ 2,165.76	3%
<b>1200 kWh</b>							
50% FPL	\$ 15,600	\$ 193.70	\$ 2,324.40	15%	\$ 213.68	\$ 2,564.16	16%
100% FPL	\$ 31,200	\$ 193.70	\$ 2,324.40	7%	\$ 213.68	\$ 2,564.16	8%
150% FPL	\$ 46,800	\$ 193.70	\$ 2,324.40	5%	\$ 213.68	\$ 2,564.16	5%
200% FPL	\$ 62,400	\$ 193.70	\$ 2,324.40	4%	\$ 213.68	\$ 2,564.16	4%
<b>1400 kWh</b>							
50% FPL	\$ 15,600	\$ 224.11	\$ 2,689.32	17%	\$ 246.87	\$ 2,962.44	19%
100% FPL	\$ 31,200	\$ 224.11	\$ 2,689.32	9%	\$ 246.87	\$ 2,962.44	9%
150% FPL	\$ 46,800	\$ 224.11	\$ 2,689.32	6%	\$ 246.87	\$ 2,962.44	6%
200% FPL	\$ 62,400	\$ 224.11	\$ 2,689.32	4%	\$ 246.87	\$ 2,962.44	5%

2 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 10,220	\$ 102.47	\$ 1,229.64	12%	\$ 114.09	\$ 1,369.08	13%
100% FPL	\$ 20,440	\$ 102.47	\$ 1,229.64	6%	\$ 114.09	\$ 1,369.08	7%
150% FPL	\$ 30,660	\$ 102.47	\$ 1,229.64	4%	\$ 114.09	\$ 1,369.08	4%
200% FPL	\$ 40,880	\$ 102.47	\$ 1,229.64	3%	\$ 114.09	\$ 1,369.08	3%
<b>800 kWh</b>							
50% FPL	\$ 10,220	\$ 132.88	\$ 1,594.56	16%	\$ 147.28	\$ 1,767.36	17%
100% FPL	\$ 20,440	\$ 132.88	\$ 1,594.56	8%	\$ 147.28	\$ 1,767.36	9%
150% FPL	\$ 30,660	\$ 132.88	\$ 1,594.56	5%	\$ 147.28	\$ 1,767.36	6%
200% FPL	\$ 40,880	\$ 132.88	\$ 1,594.56	4%	\$ 147.28	\$ 1,767.36	4%
<b>1000 kWh</b>							
50% FPL	\$ 10,220	\$ 163.29	\$ 1,959.48	19%	\$ 180.48	\$ 2,165.76	21%
100% FPL	\$ 20,440	\$ 163.29	\$ 1,959.48	10%	\$ 180.48	\$ 2,165.76	11%
150% FPL	\$ 30,660	\$ 163.29	\$ 1,959.48	6%	\$ 180.48	\$ 2,165.76	7%
200% FPL	\$ 40,880	\$ 163.29	\$ 1,959.48	5%	\$ 180.48	\$ 2,165.76	5%
<b>1200 kWh</b>							
50% FPL	\$ 10,220	\$ 193.70	\$ 2,324.40	23%	\$ 213.68	\$ 2,564.16	25%
100% FPL	\$ 20,440	\$ 193.70	\$ 2,324.40	11%	\$ 213.68	\$ 2,564.16	13%
150% FPL	\$ 30,660	\$ 193.70	\$ 2,324.40	8%	\$ 213.68	\$ 2,564.16	8%
200% FPL	\$ 40,880	\$ 193.70	\$ 2,324.40	6%	\$ 213.68	\$ 2,564.16	6%
<b>1400 kWh</b>							
50% FPL	\$ 10,220	\$ 224.11	\$ 2,689.32	26%	\$ 246.87	\$ 2,962.44	29%
100% FPL	\$ 20,440	\$ 224.11	\$ 2,689.32	13%	\$ 246.87	\$ 2,962.44	14%
150% FPL	\$ 30,660	\$ 224.11	\$ 2,689.32	9%	\$ 246.87	\$ 2,962.44	10%
200% FPL	\$ 40,880	\$ 224.11	\$ 2,689.32	7%	\$ 246.87	\$ 2,962.44	7%

\*income levels represent 50%, 100%, 150%, and 200% FPL, using 2024 federal poverty guidelines.

HHS Poverty Guidelines for 2024, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

\*\*Current Charges from Electric Pa. PUC Tariff No. 1 Original Page 61

(<https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff.pdf>)

\*\*\*Proposed Charges from Electric Pa. PUC Tariff No. 1 Revised Page 61

\*\*\*\*Calculations Exclude Riders

**CAUSE-PA Exhibit 1 (b)**

**Penelec - Energy Burden, Current and Proposed Residential Rates**

4 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 15,600	\$ 106.16	\$ 1,273.92	8%	\$ 118.78	\$ 1,425.36	9%
100% FPL	\$ 31,200	\$ 106.16	\$ 1,273.92	4%	\$ 118.78	\$ 1,425.36	5%
150% FPL	\$ 46,800	\$ 106.16	\$ 1,273.92	3%	\$ 118.78	\$ 1,425.36	3%
200% FPL	\$ 62,400	\$ 106.16	\$ 1,273.92	2%	\$ 118.78	\$ 1,425.36	2%
<b>800 kWh</b>							
50% FPL	\$ 15,600	\$ 137.79	\$ 1,653.48	11%	\$ 153.54	\$ 1,842.48	12%
100% FPL	\$ 31,200	\$ 137.79	\$ 1,653.48	5%	\$ 153.54	\$ 1,842.48	6%
150% FPL	\$ 46,800	\$ 137.79	\$ 1,653.48	4%	\$ 153.54	\$ 1,842.48	4%
200% FPL	\$ 62,400	\$ 137.79	\$ 1,653.48	3%	\$ 153.54	\$ 1,842.48	3%
<b>1000 kWh</b>							
50% FPL	\$ 15,600	\$ 169.43	\$ 2,033.16	13%	\$ 188.30	\$ 2,259.60	14%
100% FPL	\$ 31,200	\$ 169.43	\$ 2,033.16	7%	\$ 188.30	\$ 2,259.60	7%
150% FPL	\$ 46,800	\$ 169.43	\$ 2,033.16	4%	\$ 188.30	\$ 2,259.60	5%
200% FPL	\$ 62,400	\$ 169.43	\$ 2,033.16	3%	\$ 188.30	\$ 2,259.60	4%
<b>1200 kWh</b>							
50% FPL	\$ 15,600	\$ 201.07	\$ 2,412.84	15%	\$ 223.06	\$ 2,676.72	17%
100% FPL	\$ 31,200	\$ 201.07	\$ 2,412.84	8%	\$ 223.06	\$ 2,676.72	9%
150% FPL	\$ 46,800	\$ 201.07	\$ 2,412.84	5%	\$ 223.06	\$ 2,676.72	6%
200% FPL	\$ 62,400	\$ 201.07	\$ 2,412.84	4%	\$ 223.06	\$ 2,676.72	4%
<b>1400 kWh</b>							
50% FPL	\$ 15,600	\$ 232.70	\$ 2,792.40	18%	\$ 257.82	\$ 3,093.84	20%
100% FPL	\$ 31,200	\$ 232.70	\$ 2,792.40	9%	\$ 257.82	\$ 3,093.84	10%
150% FPL	\$ 46,800	\$ 232.70	\$ 2,792.40	6%	\$ 257.82	\$ 3,093.84	7%
200% FPL	\$ 62,400	\$ 232.70	\$ 2,792.40	4%	\$ 257.82	\$ 3,093.84	5%

2 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 10,220	\$ 106.16	\$ 1,273.92	12%	\$ 118.78	\$ 1,425.36	14%
100% FPL	\$ 20,440	\$ 106.16	\$ 1,273.92	6%	\$ 118.78	\$ 1,425.36	7%
150% FPL	\$ 30,660	\$ 106.16	\$ 1,273.92	4%	\$ 118.78	\$ 1,425.36	5%
200% FPL	\$ 40,880	\$ 106.16	\$ 1,273.92	3%	\$ 118.78	\$ 1,425.36	3%
<b>800 kWh</b>							
50% FPL	\$ 10,220	\$ 137.79	\$ 1,653.48	16%	\$ 153.54	\$ 1,842.48	18%
100% FPL	\$ 20,440	\$ 137.79	\$ 1,653.48	8%	\$ 153.54	\$ 1,842.48	9%
150% FPL	\$ 30,660	\$ 137.79	\$ 1,653.48	5%	\$ 153.54	\$ 1,842.48	6%
200% FPL	\$ 40,880	\$ 137.79	\$ 1,653.48	4%	\$ 153.54	\$ 1,842.48	5%
<b>1000 kWh</b>							
50% FPL	\$ 10,220	\$ 169.43	\$ 2,033.16	20%	\$ 188.30	\$ 2,259.60	22%
100% FPL	\$ 20,440	\$ 169.43	\$ 2,033.16	10%	\$ 188.30	\$ 2,259.60	11%
150% FPL	\$ 30,660	\$ 169.43	\$ 2,033.16	7%	\$ 188.30	\$ 2,259.60	7%
200% FPL	\$ 40,880	\$ 169.43	\$ 2,033.16	5%	\$ 188.30	\$ 2,259.60	6%
<b>1200 kWh</b>							
50% FPL	\$ 10,220	\$ 201.07	\$ 2,412.84	24%	\$ 223.06	\$ 2,676.72	26%
100% FPL	\$ 20,440	\$ 201.07	\$ 2,412.84	12%	\$ 223.06	\$ 2,676.72	13%
150% FPL	\$ 30,660	\$ 201.07	\$ 2,412.84	8%	\$ 223.06	\$ 2,676.72	9%
200% FPL	\$ 40,880	\$ 201.07	\$ 2,412.84	6%	\$ 223.06	\$ 2,676.72	7%
<b>1400 kWh</b>							
50% FPL	\$ 10,220	\$ 232.70	\$ 2,792.40	27%	\$ 257.82	\$ 3,093.84	30%
100% FPL	\$ 20,440	\$ 232.70	\$ 2,792.40	14%	\$ 257.82	\$ 3,093.84	15%
150% FPL	\$ 30,660	\$ 232.70	\$ 2,792.40	9%	\$ 257.82	\$ 3,093.84	10%
200% FPL	\$ 40,880	\$ 232.70	\$ 2,792.40	7%	\$ 257.82	\$ 3,093.84	8%

\*income levels represent 50%, 100%, 150%, and 200% FPL, using 2024 federal poverty guidelines.

HHS Poverty Guidelines for 2024, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

(<https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/P>

\*\*\*Proposed Charges from Electric Pa. PUC Tariff No. 1 Revised Page 61

\*\*\*\*Calculations Exclude Riders

**CAUSE-PA Exhibit 1 (c)**

**Penn Power - Energy Burden, Current and Proposed Residential Rates**

4 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 15,600	\$ 99.69	\$ 1,196.28	8%	\$ 115.51	\$ 1,386.12	9%
100% FPL	\$ 31,200	\$ 99.69	\$ 1,196.28	4%	\$ 115.51	\$ 1,386.12	4%
150% FPL	\$ 46,800	\$ 99.69	\$ 1,196.28	3%	\$ 115.51	\$ 1,386.12	3%
200% FPL	\$ 62,400	\$ 99.69	\$ 1,196.28	2%	\$ 115.51	\$ 1,386.12	2%
<b>800 kWh</b>							
50% FPL	\$ 15,600	\$ 129.61	\$ 1,555.32	10%	\$ 149.18	\$ 1,790.16	11%
100% FPL	\$ 31,200	\$ 129.61	\$ 1,555.32	5%	\$ 149.18	\$ 1,790.16	6%
150% FPL	\$ 46,800	\$ 129.61	\$ 1,555.32	3%	\$ 149.18	\$ 1,790.16	4%
200% FPL	\$ 62,400	\$ 129.61	\$ 1,555.32	2%	\$ 149.18	\$ 1,790.16	3%
<b>1000 kWh</b>							
50% FPL	\$ 15,600	\$ 159.26	\$ 1,911.12	12%	\$ 182.85	\$ 2,194.20	14%
100% FPL	\$ 31,200	\$ 159.26	\$ 1,911.12	6%	\$ 182.85	\$ 2,194.20	7%
150% FPL	\$ 46,800	\$ 159.26	\$ 1,911.12	4%	\$ 182.85	\$ 2,194.20	5%
200% FPL	\$ 62,400	\$ 159.26	\$ 1,911.12	3%	\$ 182.85	\$ 2,194.20	4%
<b>1200 kWh</b>							
50% FPL	\$ 15,600	\$ 188.91	\$ 2,266.92	15%	\$ 216.52	\$ 2,598.24	17%
100% FPL	\$ 31,200	\$ 188.91	\$ 2,266.92	7%	\$ 216.52	\$ 2,598.24	8%
150% FPL	\$ 46,800	\$ 188.91	\$ 2,266.92	5%	\$ 216.52	\$ 2,598.24	6%
200% FPL	\$ 62,400	\$ 188.91	\$ 2,266.92	4%	\$ 216.52	\$ 2,598.24	4%
<b>1400 kWh</b>							
50% FPL	\$ 15,600	\$ 218.56	\$ 2,622.72	17%	\$ 250.19	\$ 3,002.28	19%
100% FPL	\$ 31,200	\$ 218.56	\$ 2,622.72	8%	\$ 250.19	\$ 3,002.28	10%
150% FPL	\$ 46,800	\$ 218.56	\$ 2,622.72	6%	\$ 250.19	\$ 3,002.28	6%
200% FPL	\$ 62,400	\$ 218.56	\$ 2,622.72	4%	\$ 250.19	\$ 3,002.28	5%

2 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 10,220	\$ 99.69	\$ 1,196.28	12%	\$ 115.51	\$ 1,386.12	14%
100% FPL	\$ 20,440	\$ 99.69	\$ 1,196.28	6%	\$ 115.51	\$ 1,386.12	7%
150% FPL	\$ 30,660	\$ 99.69	\$ 1,196.28	4%	\$ 115.51	\$ 1,386.12	5%
200% FPL	\$ 40,880	\$ 99.69	\$ 1,196.28	3%	\$ 115.51	\$ 1,386.12	3%
<b>800 kWh</b>							
50% FPL	\$ 10,220	\$ 129.61	\$ 1,555.32	15%	\$ 149.18	\$ 1,790.16	18%
100% FPL	\$ 20,440	\$ 129.61	\$ 1,555.32	8%	\$ 149.18	\$ 1,790.16	9%
150% FPL	\$ 30,660	\$ 129.61	\$ 1,555.32	5%	\$ 149.18	\$ 1,790.16	6%
200% FPL	\$ 40,880	\$ 129.61	\$ 1,555.32	4%	\$ 149.18	\$ 1,790.16	4%
<b>1000 kWh</b>							
50% FPL	\$ 10,220	\$ 159.26	\$ 1,911.12	19%	\$ 182.85	\$ 2,194.20	21%
100% FPL	\$ 20,440	\$ 159.26	\$ 1,911.12	9%	\$ 182.85	\$ 2,194.20	11%
150% FPL	\$ 30,660	\$ 159.26	\$ 1,911.12	6%	\$ 182.85	\$ 2,194.20	7%
200% FPL	\$ 40,880	\$ 159.26	\$ 1,911.12	5%	\$ 182.85	\$ 2,194.20	5%
<b>1200 kWh</b>							
50% FPL	\$ 10,220	\$ 188.91	\$ 2,266.92	22%	\$ 216.52	\$ 2,598.24	25%
100% FPL	\$ 20,440	\$ 188.91	\$ 2,266.92	11%	\$ 216.52	\$ 2,598.24	13%
150% FPL	\$ 30,660	\$ 188.91	\$ 2,266.92	7%	\$ 216.52	\$ 2,598.24	8%
200% FPL	\$ 40,880	\$ 188.91	\$ 2,266.92	6%	\$ 216.52	\$ 2,598.24	6%
<b>1400 kWh</b>							
50% FPL	\$ 10,220	\$ 218.56	\$ 2,622.72	26%	\$ 250.19	\$ 3,002.28	29%
100% FPL	\$ 20,440	\$ 218.56	\$ 2,622.72	13%	\$ 250.19	\$ 3,002.28	15%
150% FPL	\$ 30,660	\$ 218.56	\$ 2,622.72	9%	\$ 250.19	\$ 3,002.28	10%
200% FPL	\$ 40,880	\$ 218.56	\$ 2,622.72	6%	\$ 250.19	\$ 3,002.28	7%

\*income levels represent 50%, 100%, 150%, and 200% FPL, using 2024 federal poverty guidelines.

HHS Poverty Guidelines for 2024, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

(<https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA>)

\*\*\*Proposed Charges from Electric Pa. PUC Tariff No. 1 Revised Page 61

\*\*\*\*Calculations Exclude Riders

**CAUSE-PA Exhibit 1 (d)**

**West Penn Power - Energy Burdens, Current and Proposed Residential Rates**

4 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 15,600	\$ 81.08	\$ 972.96	6%	\$ 92.70	\$ 1,112.40	7%
100% FPL	\$ 31,200	\$ 81.08	\$ 972.96	3%	\$ 92.70	\$ 1,112.40	4%
150% FPL	\$ 46,800	\$ 81.08	\$ 972.96	2%	\$ 92.70	\$ 1,112.40	2%
200% FPL	\$ 62,400	\$ 81.08	\$ 972.96	2%	\$ 92.70	\$ 1,112.40	2%
<b>800 kWh</b>							
50% FPL	\$ 15,600	\$ 105.63	\$ 1,267.56	8%	\$ 119.77	\$ 1,437.24	9%
100% FPL	\$ 31,200	\$ 105.63	\$ 1,267.56	4%	\$ 119.77	\$ 1,437.24	5%
150% FPL	\$ 46,800	\$ 105.63	\$ 1,267.56	3%	\$ 119.77	\$ 1,437.24	3%
200% FPL	\$ 62,400	\$ 105.63	\$ 1,267.56	2%	\$ 119.77	\$ 1,437.24	2%
<b>1000 kWh</b>							
50% FPL	\$ 15,600	\$ 130.18	\$ 1,562.16	10%	\$ 146.84	\$ 1,762.08	11%
100% FPL	\$ 31,200	\$ 130.18	\$ 1,562.16	5%	\$ 146.84	\$ 1,762.08	6%
150% FPL	\$ 46,800	\$ 130.18	\$ 1,562.16	3%	\$ 146.84	\$ 1,762.08	4%
200% FPL	\$ 62,400	\$ 130.18	\$ 1,562.16	3%	\$ 146.84	\$ 1,762.08	3%
<b>1200 kWh</b>							
50% FPL	\$ 15,600	\$ 154.73	\$ 1,856.76	12%	\$ 173.91	\$ 2,086.92	13%
100% FPL	\$ 31,200	\$ 154.73	\$ 1,856.76	6%	\$ 173.91	\$ 2,086.92	7%
150% FPL	\$ 46,800	\$ 154.73	\$ 1,856.76	4%	\$ 173.91	\$ 2,086.92	4%
200% FPL	\$ 62,400	\$ 154.73	\$ 1,856.76	3%	\$ 173.91	\$ 2,086.92	3%
<b>1400 kWh</b>							
50% FPL	\$ 15,600	\$ 179.28	\$ 2,151.36	14%	\$ 200.98	\$ 2,411.76	15%
100% FPL	\$ 31,200	\$ 179.28	\$ 2,151.36	7%	\$ 200.98	\$ 2,411.76	8%
150% FPL	\$ 46,800	\$ 179.28	\$ 2,151.36	5%	\$ 200.98	\$ 2,411.76	5%
200% FPL	\$ 62,400	\$ 179.28	\$ 2,151.36	3%	\$ 200.98	\$ 2,411.76	4%

2 Person Household							
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED
<b>600 kWh</b>							
50% FPL	\$ 10,220	\$ 81.08	\$ 972.96	10%	\$ 92.70	\$ 1,112.40	11%
100% FPL	\$ 20,440	\$ 81.08	\$ 972.96	5%	\$ 92.70	\$ 1,112.40	5%
150% FPL	\$ 30,660	\$ 81.08	\$ 972.96	3%	\$ 92.70	\$ 1,112.40	4%
200% FPL	\$ 40,880	\$ 81.08	\$ 972.96	2%	\$ 92.70	\$ 1,112.40	3%
<b>800 kWh</b>							
50% FPL	\$ 10,220	\$ 105.63	\$ 1,267.56	12%	\$ 119.77	\$ 1,437.24	14%
100% FPL	\$ 20,440	\$ 105.63	\$ 1,267.56	6%	\$ 119.77	\$ 1,437.24	7%
150% FPL	\$ 30,660	\$ 105.63	\$ 1,267.56	4%	\$ 119.77	\$ 1,437.24	5%
200% FPL	\$ 40,880	\$ 105.63	\$ 1,267.56	3%	\$ 119.77	\$ 1,437.24	4%
<b>1000 kWh</b>							
50% FPL	\$ 10,220	\$ 130.18	\$ 1,562.16	15%	\$ 146.84	\$ 1,762.08	17%
100% FPL	\$ 20,440	\$ 130.18	\$ 1,562.16	8%	\$ 146.84	\$ 1,762.08	9%
150% FPL	\$ 30,660	\$ 130.18	\$ 1,562.16	5%	\$ 146.84	\$ 1,762.08	6%
200% FPL	\$ 40,880	\$ 130.18	\$ 1,562.16	4%	\$ 146.84	\$ 1,762.08	4%
<b>1200 kWh</b>							
50% FPL	\$ 10,220	\$ 154.73	\$ 1,856.76	18%	\$ 173.91	\$ 2,086.92	20%
100% FPL	\$ 20,440	\$ 154.73	\$ 1,856.76	9%	\$ 173.91	\$ 2,086.92	10%
150% FPL	\$ 30,660	\$ 154.73	\$ 1,856.76	6%	\$ 173.91	\$ 2,086.92	7%
200% FPL	\$ 40,880	\$ 154.73	\$ 1,856.76	5%	\$ 173.91	\$ 2,086.92	5%
<b>1400 kWh</b>							
50% FPL	\$ 10,220	\$ 179.28	\$ 2,151.36	21%	\$ 200.98	\$ 2,411.76	24%
100% FPL	\$ 20,440	\$ 179.28	\$ 2,151.36	11%	\$ 200.98	\$ 2,411.76	12%
150% FPL	\$ 30,660	\$ 179.28	\$ 2,151.36	7%	\$ 200.98	\$ 2,411.76	8%
200% FPL	\$ 40,880	\$ 179.28	\$ 2,151.36	5%	\$ 200.98	\$ 2,411.76	6%

\*income levels represent 50%, 100%, 150%, and 200% FPL, using 2024 federal poverty guidelines.  
HHS Poverty Guidelines for 2024, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>  
(<https://www.firstenergycorp.com/content/dam/customer/Choice/Files/PA/tariffs>)  
\*\*\*Proposed Charges from Electric Pa. PUC Tariff No. 1 Revised Page 61  
\*\*\*\*Calculations Exclude Riders

CAUSE-PA St. 1, Geller

Appendix A

Resume - Harry S. Geller, Esq.

## **RESUME OF HARRY S. GELLER**

### **EDUCATIONAL BACKGROUND:**

Harpur College, State University of New York at Binghamton, B.A. 1966

Washington College of Law, American University, J.D. 1969

New York University Law School, courses in Urban Affairs and Poverty Law, as part of Volunteers in Service to America (VISTA) Program 1969-1971

### **EMPLOYMENT:**

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

While at PULP, served in the following capacities:

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

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

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

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

### **BAR ADMISSIONS**

New York State

Commonwealth of Pennsylvania

United States District Court, Middle District of Pennsylvania

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

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

- Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
- Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
- Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
- Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.
- PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
- Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
- Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.
- Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company,
- Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.
- Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.
- Pa. PUC v. PGW, Docket No. R-2023-3037933.
- Pa. PUC v. PWSA, Docket Nos. R-2023-3039920; R-2023-3039921; R-2023-3039919
- Pa. PUC v. PAWC, Docket Nos. R-2023-3043189; R-2023-3043190
- Pa. PUC v. Peoples Natural Gas Co. LLC, Docket No. R-2023-3044549
- Pet. of PPL Electric Utilities Corp. for Approval of DSP for Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290

**CAUSE-PA Statement 1**  
**APPENDIX B**  
**CITED INTERROGATORY RESPONSES**

CAUSE-PA to FE PA

- CAUSE-PA I-1
- CAUSE-PA I-3, Attachment A
- CAUSE-PA I-4
- CAUSE-PA I-5
- CAUSE-PA I-6, Attachment A
- CAUSE-PA I-8, Attachment A
- CAUSE-PA I-10
- CAUSE-PA I-11
- CAUSE-PA I-13, Attachment A
- CAUSE-PA I-14, Attachment A
- CAUSE-PA I-15, Attachment A and B
- CAUSE-PA I-16, Attachment A, B, C
- CAUSE-PA I-19, Attachment A
- CAUSE-PA I-20
- CAUSE-PA I-23, Attachment A
- CAUSE-PA II-1, Attachment A
- CAUSE-PA II-2, Attachment A
- CAUSE-PA II-3, Attachment A and B
- CAUSE-PA II-4, Attachment A
- CAUSE-PA II-5, Attachments I, J, G
- CAUSE-PA II-14, Attachment A
- CAUSE-PA II-16, Attachment A
- CAUSE-PA II-22, Attachment A
- CAUSE-PA III-1, Attachments A-G
- CAUSE-PA III-2, Attachments A-C
- CAUSE-PA III-3
- CAUSE-PA III-5
- CAUSE-PA III-8
- CAUSE-PA III-11
- CAUSE-PA III-12
- CAUSE-PA III-13
- CAUSE-PA III-14
- CAUSE-PA III-15
- CAUSE-PA III-16
- CAUSE-PA III-20, Attachment AJ
- CAUSE-PA III-25
- CAUSE-PA III-28, Attachment A
- CAUSE-PA IV-2, Attachment A

OCA to FE PA

- OCA I-1, Attachment L-P
- OCA I-6, Attachment B

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 1**

“Please identify:

- a. The date that FirstEnergy intends to implement its pending Percentage of Income Payment (PIP) structure, as approved in FirstEnergy’s 2024-2028 Universal Service and Energy Conservation Plan (Docket Nos. Docket No. M-2022-3036532, et al);
- b. The bill impacts of the proposed rate increase on FE PA’s customers enrolled in FE PA’s Customer Assistance Program (PCAP), by payment plan type and Rate District, assuming FirstEnergy’s existing PIP CAP credit structure for its PCAP program is in place;
- c. The bill impacts of the proposed rate increase on FE PA’s customers enrolled in FE PA’s Customer Assistance Program (PCAP), by payment plan type and Rate District, assuming FirstEnergy’s pending PIP structure for its PCAP program is in place;

For b. and c., if you are unable to identify the bill impact, or assert that there will be no impact, please explain.”

**RESPONSE:**

- a. CAUSE-PA filed a Petition for Reconsideration for the 2024-2028 Universal Service and Energy Conservation Plan related to the subsidy maximum. Subsidy maximum is a core piece of how the program works. The Company will not be able to complete the technical changes until this is resolved. The Company does plan to implement changes that are not dependent on the subsidy maximum in September 2024. The Company cannot determine the implementation date for the Percentage of Income Payment structures until the Petition for Reconsideration has been resolved.
- b. PCAP participants are currently billed on the Equal Payment Plan, which is a budget billing plan. If they are eligible for a monthly subsidy credit on PCAP, the monthly budget bill is reduced by the monthly credit. With the proposed rate increase, the Equal Payment Plan amount could increase based on the new price per kWh. The monthly credit is also recalculated each month to consider the most recent twelve months of energy burden. It will gradually adjust the monthly credit up or down based on the customers’ bills. The monthly credit is subject to a maximum subsidy limit. If the customer is receiving the maximum subsidy credit already, the excess shortfall is due with the monthly PCAP bill.

- c. With the 2024-2028 USECP, the monthly PCAP bill will be based on a percentage of the household income. The PCAP bill can be the percentage of income payment or the actual charges, whichever is less. However, if that amount is less than the required minimum amount, the customer is charged a minimum bill amount.

There are three different monthly payment types for the pending PCAP structure and the impact of the proposed rate will vary as follows:

- Minimum bills – The minimum bill amount is not impacted by the proposed rate increase. It is \$12 for non-electric heating accounts and \$45 for electric heating accounts.
- Actual charges – If the proposed rate change increases the actual charges to be higher than the minimum bill, customer will pay the actual charges, assuming the actual charges are less than the percentage of income amount.
- Percentage of Income – Amount is calculated based on a percentage (defined by federal poverty level tiers) multiplied by the household income amount. The percentage of income payment amount is not impacted by the proposed rate increase.

The difference between the actual charges and the PCAP bill will be credited with a monthly subsidy credit, which may be limited to a maximum subsidy. For participants that exhaust a maximum subsidy amount, the PCAP bill becomes equal to the actual bill charges.

Because the impact of the proposed rate increase on a CAP customer varies depending upon the individual customer's circumstance, the Company cannot determine with any degree of certainty what the bill impact by payment plan type would be for a CAP customer.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 3**

“Assuming PCAP utilizing the PIP structure approved by the Commission in FE PA’s USECP and pending implementation, please indicate the number of FE PA PCAP customers whose bills would be calculated utilizing the following CAP rates, at both present and proposed residential rates:

- a. Percentage of income (disaggregated by income tier);
- b. Actual Charges;
- c. Minimum bill; or
- d. Other (please specify).

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

a-d. See FE PA Response to CAUSE Interrogatory Set I, No. 3, Attachment A for an estimated count of customers billed on each CAP rate using 2023 data for participants that were on the program for 12 months.

<b>PCAP Bills Calculated Based On CAP Rates</b>						
<b>Company</b>	<b>No. of Customers Billed Actual Charges at the Current Rate</b>	<b>No. of Customers Billed Actual Charges at the Proposed Rate</b>	<b>No. of Customers Billed a Minimum Bill at the Current Rate</b>	<b>No. of Customers Billed a Minimum Bill at the Proposed Rate</b>	<b>No. of Customers Billed the Percentage of Income at the Current Rate</b>	<b>No. of Customers Billed the Percentage of Income at the Proposed Rate</b>
<b>Met -Ed</b>	5,748	4,989	6,622	6,533	15,258	15,357
<b>Penelec</b>	6,756	5,566	6,814	6,659	22,340	22,479
<b>Penn Power</b>	1,624	1,286	1,599	1,582	5,046	5,078
<b>West Penn Power</b>	7,079	5,967	7,124	6,979	18,911	19,006

The sample contains customers who were on PCAP for twelve months and received twelve bills during 2023.

Throughout the year a customer may be billed using any of the CAP rates depending on their usage in any given month. A customer can be counted in more than one CAP rate.

Example: the customer may pay a PIP bill one month and actual charges in another month, whichever is less.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 4**

“Please identify all categories or identifiers that FE PA includes when calculating its “confirmed low income customer” count for the purposes of reporting pursuant to 52 Pa. Code § 54.75. If FE PA uses a different definition or categorization criteria for “confirmed low income customer” for any purpose, please identify the alternative definition and/or criteria and explain why a different definition is used.”

**RESPONSE:**

FE PA uses the reported income levels from Pennsylvania Customer Assistance Program (PCAP) enrollments, Low Income Home Energy Assistance Program (LIHEAP) grants, and payment arrangements to calculate the confirmed low-income customers for the purposes of the annual reporting pursuant to 52 Pa. Code § 54.75.

For security deposit exemption, the Company defines “confirmed low-income” as customers who enrolled on the (PCAP) or received (LIHEAP).

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 5**

“For 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were/are categorized as a confirmed low income customer? If FE PA uses multiple definitions of the term “confirmed low income”, as identified in CAUSE-PA to FE PA I-4 please separately provide the data requested for each definition.

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

For confirmed low income as defined for the Universal Service Reporting Requirements, see FE PA Response to OCA Interrogatory Set I, No. 1, Attachments L-P for the number of customers categorized as confirmed low income.

For confirmed low income as defined in the security deposit exemption process, see FE PA Response to OCA Interrogatory Set I, No. 1, Attachments L-P for the number of participants in PCAP or LIHEAP.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 6**

“For 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were enrolled in FE PA’s PCAP? Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set I, No. 6, Attachment A.

PCAP Participants	Met-Ed	Penelec	Penn Power	West Penn	FE PA Total
<b>2019</b>					
Jan	14,737	20,608	4,541	18,768	58,654
Feb	14,666	20,519	4,511	18,372	58,068
Mar	14,722	20,443	4,489	18,536	58,190
Apr	14,696	20,226	4,439	18,438	57,799
May	14,400	19,772	4,309	17,964	56,445
Jun	14,000	19,318	4,197	17,434	54,949
Jul	13,939	19,300	4,212	17,344	54,795
Aug	13,765	19,153	4,096	16,813	53,827
Sep	13,523	18,810	3,996	16,133	52,462
Oct	13,347	18,571	3,900	15,704	51,522
Nov	13,078	18,218	3,936	15,584	50,816
Dec	13,043	18,287	3,976	15,692	50,998

**2020**

Jan	13,340	18,653	4,035	16,011	52,039
Feb	13,564	18,985	4,107	16,269	52,925
Mar	13,801	19,219	4,205	16,485	53,710
Apr	14,503	19,852	4,319	17,222	55,896
May	15,443	20,610	4,530	18,196	58,779
Jun	16,200	21,461	4,742	19,103	61,506
Jul	16,697	22,011	4,846	19,633	63,187
Aug	17,084	22,399	4,946	19,971	64,400
Sep	17,460	22,866	5,086	20,469	65,881
Oct	18,228	23,784	5,254	21,286	68,552
Nov	18,597	24,431	5,390	21,847	70,265
Dec	19,310	25,345	5,546	22,591	72,792

**2021**

Jan	19,757	25,931	5,652	23,056	74,396
Feb	20,130	26,346	5,773	23,365	75,614
Mar	20,420	26,779	5,883	23,715	76,797
Apr	20,553	27,057	5,930	24,105	77,645
May	20,332	27,000	5,922	23,876	77,130
Jun	20,296	26,907	5,937	23,771	76,911
Jul	20,244	26,896	5,919	23,621	76,680
Aug	20,218	26,880	5,906	23,575	76,579
Sep	20,334	27,042	5,957	23,696	77,029
Oct	20,701	27,522	6,069	24,156	78,448
Nov	21,025	28,002	6,173	24,510	79,710

Dec	21,280	28,463	6,281	24,792	80,816
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**2022**

Jan	21,417	28,675	6,335	25,003	81,430
Feb	21,793	29,151	6,432	25,287	82,663
Mar	22,040	29,398	6,516	25,538	83,492
Apr	22,106	29,489	6,522	25,707	83,824
May	21,903	29,237	6,486	25,462	83,088
Jun	22,332	29,871	6,613	25,905	84,721
Jul	22,467	29,961	6,676	25,905	85,009
Aug	22,592	30,056	6,743	26,113	85,504
Sep	22,823	30,355	6,799	26,386	86,363
Oct	22,750	30,314	5,374	26,333	84,771
Nov	21,780	29,415	6,834	25,639	83,668
Dec	21,325	28,988	6,835	25,124	82,272

**2023**

Jan	21,247	28,912	6,799	25,042	82,000
Feb	20,822	28,520	6,681	24,604	80,627
Mar	21,297	28,990	6,781	25,084	82,152
Apr	21,735	29,429	6,868	25,575	83,607
May	21,899	29,590	6,882	25,762	84,133
Jun	22,370	30,128	7,001	26,175	85,674
Jul	22,491	30,136	7,013	26,189	85,829
Aug	22,534	30,239	7,031	26,323	86,127
Sep	22,879	30,502	7,018	26,563	86,962
Oct	22,789	30,475	6,362	26,592	86,218
Nov	22,224	29,620	6,002	25,920	83,766
Dec	21,552	28,821	5,990	25,116	81,479

**2024**

Jan	20,988	28,181	5,623	24,460	79,252
Feb	19,982	26,806	5,306	23,119	75,213
Mar	17,756	23,990	5,268	20,497	67,511

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 8**

“For 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, please identify the total number of FE PA residential customers. Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Set I, No. 8, Attachment A. Please note the FE PA rate districts are identified in the Excel spreadsheet as Met-Ed (“ME”), Penelec (“PN”), Penn Power (“PP”), West Penn Power (“WP”).

Note: 2024 data is as of the last day of February

2019					
Month	ME	PN	PP	WP	FE PA
January	503,960	502,040	145,842	627,824	1,779,666
February	504,145	502,099	145,896	627,962	1,780,102
March	504,132	501,984	145,935	627,975	1,780,026
April	504,096	501,635	145,958	627,865	1,779,554
May	503,947	500,687	145,926	627,079	1,777,639
June	503,926	500,087	145,910	626,766	1,776,689
July	504,269	500,150	145,938	626,816	1,777,173
August	504,370	499,794	145,931	626,580	1,776,675
September	504,991	500,042	146,039	627,176	1,778,248
October	505,454	500,261	146,124	627,451	1,779,290
November	506,183	500,754	146,292	628,085	1,781,314
December	506,737	500,991	146,418	628,405	1,782,551

2020					
ME	PN	PP	WP	FE PA	
507,218	501,147	146,555	628,787	1,783,707	
507,230	500,963	146,606	628,785	1,783,584	
507,747	501,119	146,716	629,019	1,784,601	
507,820	501,226	146,780	629,060	1,784,886	
507,945	501,038	146,823	629,133	1,784,939	
508,426	501,303	146,947	629,538	1,786,214	
508,802	501,671	147,081	629,892	1,787,446	
509,112	501,865	147,166	630,498	1,788,641	
509,584	502,103	147,257	630,898	1,789,842	
509,829	502,068	147,290	631,079	1,790,266	
510,498	502,457	147,470	631,705	1,792,130	
510,831	502,651	147,547	632,062	1,793,091	

2021					
ME	PN	PP	WP	FE PA	
511,122	502,549	147,657	632,161	1,793,489	
511,342	502,737	147,823	632,324	1,794,226	
511,707	502,649	147,906	632,525	1,794,787	
511,964	502,327	147,959	632,590	1,794,840	
511,636	501,676	147,964	632,247	1,793,523	
511,946	501,504	148,069	632,432	1,793,951	
511,957	501,330	148,104	631,949	1,793,340	
512,462	501,577	148,240	632,520	1,794,799	
512,649	501,132	148,329	632,297	1,794,407	
512,645	501,059	148,363	632,185	1,794,252	
513,420	501,607	148,567	632,818	1,796,412	
513,743	501,643	148,672	632,933	1,796,991	

2022					
Month	ME	PN	PP	WP	FE PA
January	514,433	501,978	148,790	633,496	1,798,697
February	514,584	502,052	148,867	633,583	1,799,086
March	514,702	501,862	148,878	633,668	1,799,110
April	514,507	501,464	148,813	633,363	1,798,147
May	514,547	500,740	148,797	630,907	1,794,991
June	514,775	500,522	148,786	630,784	1,794,867
July	514,854	500,078	148,725	630,275	1,793,932
August	515,200	500,209	148,820	630,708	1,794,937
September	515,635	500,454	148,966	631,175	1,796,230
October	516,014	500,629	149,122	631,556	1,797,321
November	516,585	500,988	149,232	632,085	1,798,890
December	516,874	501,125	149,328	632,277	1,799,604

2023					
ME	PN	PP	WP	FE PA	
517,308	501,295	149,454	632,675	1,800,732	
517,593	501,328	149,479	632,814	1,801,214	
517,761	501,388	149,557	632,931	1,801,637	
517,446	500,939	149,507	632,486	1,800,378	
517,647	500,515	149,496	632,401	1,800,059	
517,869	500,337	150,364	632,398	1,800,968	
518,004	500,270	149,573	632,632	1,800,479	
518,222	500,361	149,595	632,798	1,800,976	
518,432	500,276	149,584	632,652	1,800,944	
518,675	500,459	149,722	633,058	1,801,914	
519,313	500,980	149,930	633,681	1,803,904	
519,719	501,154	149,958	634,023	1,804,854	

2024 (YTD)					
ME	PN	PP	WP	FE PA	
520,156	501,482	150,102	634,393	1,806,133	
520,430	501,621	150,224	634,613	1,806,888	
				-	
				-	
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				-	
				-	
				-	
				-	

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 10**

“What is the average annual income of FE PA’s current identified confirmed low income customers?”

**RESPONSE:**

The Company does not receive income data for all confirmed low-income participants and cannot calculate the average income for those customers. As an example, the Company receives a poverty level rather than income for Low Income Home Energy Assistance Program recipients. See FE PA Response to CAUSE-PA Set I, No. 11 Attachment A for average income for PCAP participants.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 11**

“What is the average annual income of FE PA customers currently enrolled in FE PA’s PCAP?”

**RESPONSE:**

	Met-Ed	Penelec	Penn Power	West Penn Power	FE PA
Average Annual Income	\$16,417	\$15,816	\$15,651	\$15,228	\$15,783

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 13**

“For customers identified in CAUSE-PA to FE PA I-12, please additionally disaggregate by reason of CAP removal (i.e. nonpayment, failure to recertify, etc.). Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set I, No. 13, Attachment A.

Reasons for Removal By Year and Month	OpCo				
	Met-Ed	Penelec	Penn Power	West Penn	Grand Total
<b>11 - Failure to Reverify</b>	<b>15334</b>	<b>18389</b>	<b>4076</b>	<b>18807</b>	<b>56606</b>
<b>2019</b>					
Jan	460	567	132	786	1945
Feb	466	563	118	415	1562
Mar	540	653	144	626	1963
Apr	742	857	235	887	2721
May	788	954	203	1018	2963
Jun	337	414	61	486	1298
Jul	578	697	237	1081	2593
Aug	609	810	227	1176	2822
Sep	513	626	188	928	2255
Oct	712	987	151	733	2583
Nov	275	353	45	269	942
Dec	11	13	8	23	55
<b>2020</b>					
Jan	20	14	3	84	121
Feb	45	81	16	79	221
Apr	2	1			3
May	1	2		1	4
Aug				1	1
Dec		1			1
<b>2021</b>					
Jan				1	1
Aug				1	1
Nov		1			1
<b>2022</b>					
Feb	1			1	2
Mar	8	3	1	7	19
Apr	4	2	2	8	16
Jun	1				1
Jul				1	1
Aug	23	19	2	14	58
Sep	134	133	4	162	433
Oct	1177	1223	16	946	3362
Nov	764	786	24	736	2310
Dec	273	280	69	298	920
<b>2023</b>					
Jan	287	281	90	316	974
Feb		1			1
Mar	1				1

Apr		1		1	2
May	4	6	1	10	21
Jun	7	13		14	34
Jul	5	9	1	3	18
Aug			1	2	3
Sep	13	13	578	11	615
Oct	517	626	448	561	2152
Nov	629	732	9	655	2025
Dec	391	506	322	528	1747
<b>2024</b>					
Jan	1388	1631	456	1693	5168
Feb	2663	3377	182	3034	9256
Mar	945	1153	102	1211	3411
<b>12 - Income Too High</b>	<b>2128</b>	<b>2283</b>	<b>530</b>	<b>2085</b>	<b>7026</b>
<b>2019</b>					
Jan	82	109	24	72	287
Feb	41	52	17	53	163
Mar	31	46	9	33	119
Apr	37	48	9	36	130
May	38	47	12	44	141
Jun	31	50	18	52	151
Jul	44	49	21	66	180
Aug	52	58	12	41	163
Sep	52	51	17	48	168
Oct	53	76	8	37	174
Nov	24	30	7	30	91
Dec	57	48	9	49	163
<b>2020</b>					
Jan	66	49	12	61	188
Feb	53	59	9	46	167
Mar	33	36	6	20	95
Apr	13	14	6	20	53
May	21	15	2	21	59
Jun	16	21	1	18	56
Jul	19	19	4	11	53
Aug	28	22	7	33	90
Sep	45	35	11	41	132
Oct	42	41	9	31	123
Nov	20	30	4	23	77
Dec	19	23	6	21	69
<b>2021</b>					
Jan	17	31	3	15	66
Feb	15	32	5	27	79
Mar	42	42	11	41	136

Apr	43	44	14	56	157
May	39	32	10	44	125
Jun	49	41	18	53	161
Jul	67	62	21	62	212
Aug	64	42	8	56	170
Sep	46	55	12	41	154
Oct	41	40	5	41	127
Nov	33	44	5	39	121
Dec	32	37	4	28	101
<b>2022</b>					
Jan	56	33	13	34	136
Feb	26	22	10	40	98
Mar	65	69	19	62	215
Apr	36	35	19	37	127
May	6	7	1	10	24
Jun	3	1			4
Jul	2	3		2	7
Aug	2	4		1	7
Sep	1	8	3	5	17
Oct	9	6	1	4	20
Nov	5	2		3	10
Dec	6	4		8	18
<b>2023</b>					
Jan	8	4	1	5	18
Feb		5	1	3	9
Mar	12	5	2	12	31
Apr	3	8	1	3	15
May	5	4		7	16
Jun	7	2		2	11
Jul	6	5	5	5	21
Aug	5	12	15	6	38
Sep	64	52	10	47	173
Oct	72	115	20	51	258
Nov	76	57	7	81	221
Dec	49	71	7	57	184
<b>2024</b>					
Jan	94	116	17	92	319
Feb	71	70	11	66	218
Mar	30	28	9	28	95
Apr	4	5	2	4	15
<b>13 - Customer Request</b>	<b>459</b>	<b>569</b>	<b>128</b>	<b>555</b>	<b>1711</b>
<b>2019</b>					
Jan	4	10	2	5	21
Feb	7	5	1	8	21

Mar	4	5	4	5	18
Apr	4	9	2	13	28
May	8	9	2	5	24
Jun	12	5	4	11	32
Jul	2	10	1	6	19
Aug	11	5	1	10	27
Sep	4	2		5	11
Oct	4	11		8	23
Nov	6	5	1	2	14
Dec	6	1		7	14
<b>2020</b>					
Jan	2	6	2	2	12
Feb	3	3		5	11
Mar	2	4		7	13
Apr	3	4	1	10	18
May	4	6	2	5	17
Jun	9	9	1	6	25
Jul	7	8	4	8	27
Aug	11	14	1	11	37
Sep	14	6	1	6	27
Oct	8	12	2	6	28
Nov	3	10		14	27
Dec	5	5		10	20
<b>2021</b>					
Jan	5	7	2	10	24
Feb	3	10		9	22
Mar	21	15	4	19	59
Apr	6	11	1	14	32
May	3	8	3	14	28
Jun	3	9	3	5	20
Jul	2	8	1	7	18
Aug	2	10	1	7	20
Sep	7	7		7	21
Oct	2	4	1	13	20
Nov	3	3		10	16
Dec	2	6		3	11
<b>2022</b>					
Jan	3	4	1	4	12
Feb	6	9	2	2	19
Mar	5	3	1	7	16
Apr	7	6	1	7	21
May	6	11	3	11	31
Jun	11	14	8	10	43
Jul	7	12	3	8	30

Aug	15	15	3	11	44
Sep	7	10	2	9	28
Oct	6	6	4	9	25
Nov	5	7	1	8	21
Dec	2	7	3	5	17
<b>2023</b>					
Jan	5	1	3	8	17
Feb	3	3	1	5	12
Mar	11	17		9	37
Apr	10	13	5	8	36
May	8	18	4	9	39
Jun	20	8	5	16	49
Jul	16	20	6	20	62
Aug	29	36	8	25	98
Sep	10	19	7	18	54
Oct	18	20	3	21	62
Nov	6	5	1	4	16
Dec	10	6	1	4	21
<b>2024</b>					
Jan	10	13	1	10	34
Feb	8	5		5	18
Mar	9	12	3	5	29
Apr	4	7		4	15
<b>14 - Fraud</b>	<b>3</b>			<b>2</b>	<b>5</b>
<b>2019</b>					
Jan	1				1
Apr				1	1
May	1				1
Jul				1	1
<b>2022</b>					
Mar	1				1
<b>16 - Insufficient Energy Burden</b>	<b>2838</b>	<b>3581</b>	<b>696</b>	<b>3234</b>	<b>10349</b>
<b>2019</b>					
Jan	57	54	16	48	175
Feb	22	38	5	24	89
Mar	30	21	6	26	83
Apr	39	30	7	24	100
May	33	26	4	31	94
Jun	25	23	6	25	79
Jul	30	35	12	30	107
Aug	34	31	7	28	100
Sep	34	31	12	30	107
Oct	39	33	11	27	110
Nov	19	42	5	25	91

Dec	49	45	10	32	136
<b>2020</b>					
Jan	60	63	10	44	177
Feb	78	75	17	52	222
Mar	72	67	17	43	199
Apr	49	56	11	53	169
May	24	21	6	17	68
Jun	23	26	7	37	93
Jul	33	51	10	35	129
Aug	32	51	12	40	135
Sep	34	54	5	45	138
Oct	36	44	9	49	138
Nov	26	53	10	56	145
Dec	76	78	14	117	285
<b>2021</b>					
Jan	47	70	15	83	215
Feb	51	54	9	73	187
Mar	60	65	19	79	223
Apr	72	62	14	90	238
May	54	66	10	80	210
Jun	56	84	13	89	242
Jul	44	67	9	72	192
Aug	64	70	14	69	217
Sep	60	64	9	55	188
Oct	35	39	8	42	124
Nov	46	64	11	71	192
Dec	40	68	17	59	184
<b>2022</b>					
Jan	35	47	14	66	162
Feb	48	57	9	73	187
Mar	48	56	9	60	173
Apr	32	52	4	46	134
May	59	121	11	58	249
Jun	67	101	10	69	247
Jul	44	52	9	44	149
Aug	56	67	12	58	193
Sep	46	85	21	60	212
Oct	47	67	15	53	182
Nov	73	73	15	68	229
Dec	78	101	10	53	242
<b>2023</b>					
Jan	41	68	18	56	183
Feb	29	55	8	35	127
Mar	69	64	14	57	204

Apr	27	42	17	24	110
May	35	50	8	52	145
Jun	39	47	5	45	136
Jul	25	53	9	50	137
Aug	49	56	19	65	189
Sep	38	53	15	41	147
Oct	43	66	15	45	169
Nov	51	62	16	54	183
Dec	37	56	7	32	132
<b>2024</b>					
Jan	60	86	8	66	220
Feb	30	57	9	45	141
Mar	28	48	8	42	126
Apr	21	18	4	17	60
<b>19 - Failure to Participate in Weatherization Pr</b>	<b>1</b>			<b>2</b>	<b>3</b>
<b>2019</b>					
Jan				1	1
Jun				1	1
<b>2020</b>					
Jan	1				1
<b>21 - Arrears Satisfied</b>	<b>973</b>	<b>915</b>	<b>161</b>	<b>1390</b>	<b>3439</b>
<b>2019</b>					
Jan	8	8	1	19	36
Feb	15	7	1	10	33
Mar	11	15	2	13	41
Apr	4	9	1	10	24
May	8	9	1	11	29
Jun	12	7		11	30
Jul	11	10	2	7	30
Aug	15	7		15	37
Sep	6	11	1	17	35
Oct	11	8	1	21	41
Nov	8	10	6	14	38
Dec	15	7	3	11	36
<b>2020</b>					
Jan	9	9	1	13	32
Feb	16	12		17	45
Mar	9	8		11	28
Apr	15	11	1	17	44
May	11	9		15	35
Jun	12	10	4	16	42
Jul	12	15	2	21	50
Aug	10	15	1	19	45
Sep	6	17	4	15	42

Oct	12	14	2	27	55
Nov	15	3	2	21	41
Dec	15	17	2	20	54
<b>2021</b>					
Jan	9	11	2	26	48
Feb	23	14	1	35	73
Mar	19	16	4	35	74
Apr	16	11	2	23	52
May	11	21	3	35	70
Jun	20	18	3	26	67
Jul	13	24	5	24	66
Aug	26	14	2	21	63
Sep	16	19	3	24	62
Oct	17	16	3	32	68
Nov	16	12	1	33	62
Dec	15	14	5	40	74
<b>2022</b>					
Jan	23	22	6	31	82
Feb	23	28	5	45	101
Mar	29	32	1	43	105
Apr	34	15	7	26	82
May	22	22	3	39	86
Jun	24	17		39	80
Jul	21	28	2	33	84
Aug	22	18	8	28	76
Sep	24	19	3	31	77
Oct	14	11	3	29	57
Nov	21	12	5	20	58
Dec	14	14	2	11	41
<b>2023</b>					
Jan	19	13	4	19	55
Feb	14	12	4	17	47
Mar	18	23	5	23	69
Apr	15	18	2	22	57
May	22	27		28	77
Jun	31	31	6	37	105
Jul	17	14	2	12	45
Aug	13	10	8	19	50
Sep	17	11	4	22	54
Oct	20	15	3	25	63
Nov	13	19		18	50
Dec	14	9	2	8	33
<b>2024</b>					
Jan	11	20	1	14	46

Feb	6	10	2	19	37
Mar	5	7	1	7	20
<b>22 - Requested Payment Plan</b>	<b>1332</b>	<b>1558</b>	<b>367</b>	<b>1684</b>	<b>4941</b>
<b>2020</b>					
Jun				1	1
<b>2021</b>					
Feb	1				1
Mar	42	58	14	62	176
Apr	244	278	61	290	873
May	289	309	71	350	1019
Jun	188	274	65	273	800
Jul	125	166	49	201	541
Aug	106	122	22	142	392
Sep	48	55	14	63	180
Oct	8	14	5	21	48
Nov	2	10		5	17
Dec		1			1
<b>2022</b>					
Jan		1	1	4	6
Feb	3			2	5
Mar	13	11	1	19	44
Apr	17	22	7	17	63
May	10	11	1	8	30
Jun	19	13	8	17	57
Jul	7	16	2	15	40
Aug	18	9	1	13	41
Sep	11	9	2	6	28
Oct		4		7	11
Nov	1	3	2	2	8
Dec		3		3	6
<b>2023</b>					
Jan	1	1	1	3	6
Feb	2	3		5	10
Mar	10	17	6	12	45
Apr	21	18	8	22	69
May	18	24	4	14	60
Jun	26	16	3	19	64
Jul	25	24	3	13	65
Aug	11	12	4	13	40
Sep	11	13	3	8	35
Oct	20	11	2	15	48
Nov	5	2		8	15
Dec			1	1	2
<b>2024</b>					

Jan	3	5	1	1	10
Feb	7	7	1	7	22
Mar	15	10	3	13	41
Apr	5	6	1	9	21
<b>23 - Other</b>	<b>57</b>	<b>84</b>	<b>23</b>	<b>49</b>	<b>213</b>
<b>2019</b>					
Jan		2			2
Feb	1	2		2	5
Mar	2	2		2	6
Apr		2		1	3
May	1	1		2	4
Jun		3			3
Jul	1	1		1	3
Aug	1	5		1	7
Sep			1		1
Oct	3	1			4
Nov	1	1	2	2	6
<b>2020</b>					
Feb	1	1		1	3
Mar		2			2
Apr	2				2
May	2				2
Jul		1			1
Aug		1			1
Sep	1			1	2
Oct		1			1
Nov		2			2
Dec		1		1	2
<b>2021</b>					
Jan		1	1		2
Feb	1				1
Mar	1	2		3	6
Apr	2		1		3
May	2	2			4
Jun	3	3	1	1	8
Jul	3	2		1	6
Aug			1		1
Sep		2		1	3
Oct	1	1	1	2	5
Nov	1		1	1	3
Dec				1	1
<b>2022</b>					
Feb		1			1
Mar	1	1	1	4	7

Apr	1	2	1		4
May	1	1		1	3
Jun	2	3			5
Jul			1	1	2
Aug		2			2
Sep		1			1
Oct			1	1	2
Nov	2	1		1	4
Dec		1	1	1	3
<b>2023</b>					
Jan	1	1		1	3
Feb	1	1	2	1	5
Mar	3	1	1		5
Apr	3	3		1	7
May		4	1	3	8
Jun		2		4	6
Jul	2			1	3
Aug	2	1	1		4
Sep	1	6	1		8
Oct	4	1	2	2	9
Nov		2	1	1	4
Dec		3			3
<b>2024</b>					
Jan	2				2
Feb	1			1	2
Mar		1		1	2
Apr		3			3
<b>27 - Deemed Ineligible by the State</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>9</b>
<b>2023</b>					
Jun		1			1
Jul			1		1
Aug	1	1			2
Sep				1	1
Oct	2	2			4
<b>30 - Not Primary Residence</b>	<b>838</b>	<b>1583</b>	<b>358</b>	<b>1280</b>	<b>4059</b>
<b>2019</b>					
Jan	18	22	3	22	65
Feb	13	24	9	14	60
Mar	7	10	5	12	34
Apr	16	37	6	32	91
May	10	28	2	25	65
Jun	8	29	2	19	58
Jul	9	30	13	27	79
Aug	12	20	6	28	66

Sep	9	10	6	9	34
Oct	14	47	8	43	112
Nov	4	15	2	8	29
Dec	5	14	10	9	38
<b>2020</b>					
Jan	13	23	8	29	73
Feb	6	6	3	13	28
Mar	15	23	4	27	69
Apr	13	14	6	23	56
May	6	17	1	11	35
Jun	14	36	7	22	79
Jul	13	30	8	26	77
Aug	24	27	6	36	93
Sep	15	17	5	15	52
Oct	8	21	7	5	41
Nov	5	8	2	2	17
Dec		7	1	6	14
<b>2021</b>					
Jan	19	27	4	30	80
Feb	14	26	2	18	60
Mar	14	31	6	17	68
Apr	4	14	4	5	27
May	9	19	4	8	40
Jun	10	46	4	20	80
Jul	9	25	3	21	58
Aug	8	23	6	14	51
Sep	14	24	3	24	65
Oct	13	21	4	15	53
Nov	16	37	6	29	88
Dec	11	21	5	15	52
<b>2022</b>					
Jan	13	5		6	24
Feb	2	12	6	5	25
Mar	17	26	7	29	79
Apr	9	15	7	7	38
May	6	12	2	13	33
Jun	14	27	9	15	65
Jul	17	35	10	36	98
Aug	23	31	4	24	82
Sep	19	28	8	28	83
Oct	19	55	9	40	123
Nov	19	28	7	27	81
Dec	19	35	6	22	82
<b>2023</b>					

Jan	26	32	7	20	85
Feb	19	27	4	15	65
Mar	14	30	8	33	85
Apr	5	11	2	11	29
May	2	10	2	3	17
Jun	19	43	11	36	109
Jul	21	31	10	13	75
Aug	19	44	10	42	115
Sep	24	32	7	19	82
Oct	13	38	8	20	79
Nov	20	30	10	38	98
Dec	18	33	3	23	77
<b>2024</b>					
Jan	21	33	5	21	80
Feb	16	18	8	24	66
Mar	19	25	6	17	67
Apr	7	8	1	14	30
<b>51 - Customer is Deceased</b>	<b>24</b>	<b>67</b>	<b>12</b>	<b>32</b>	<b>135</b>
<b>2019</b>					
Jan	1	5		1	7
Feb		1			1
Mar				1	1
Apr			1	2	3
May		3			3
Jun	2			1	3
Jul	2	1			3
Aug	1			1	2
Oct	1	1			2
Nov		1			1
Dec	1	3	1	3	8
<b>2020</b>					
Jan		2		1	3
Feb		2	1		3
Mar	1		1	1	3
Apr	1	1			2
May		1		1	2
Jul		1	1		2
Aug	1	1			2
Sep		1		1	2
Oct				1	1
<b>2021</b>					
Feb	1	1	1		3
Mar	2				2
May	1	2		1	4

Jun		1		1	2
Aug		1			1
Sep				1	1
Oct		2			2
Nov		1			1
Dec		1		2	3
<b>2022</b>					
Jan		2	1	3	6
Feb		1	1	1	3
Mar		4	5		9
Apr			3		3
Jun			1	1	2
Jul			2		2
Aug			1		1
Sep			2		2
Oct			3	1	4
Nov				1	1
Dec			1	1	2
<b>2023</b>					
Jan		1	3	2	6
Apr			1		1
Jul				1	1
Sep			1		1
Oct				2	3
Nov			2		2
Dec			1	2	3
<b>2024</b>					
Jan			3	1	4
Feb			3	1	4
Mar		1		1	2
<b>60 - Bankruptcy</b>		<b>8</b>	<b>10</b>	<b>1</b>	<b>26</b>
<b>2020</b>					
Jun				1	1
Oct			1		1
<b>2021</b>					
Apr		1		1	2
May		1			1
Jun		1	1		2
Jul		1	4	1	6
Aug		1			1
Sep			1		1
Oct		1	1	1	3
Nov			1		1
<b>2022</b>					

Jan	2				2
Jun		1			1
Aug			1		1
<b>2023</b>					
Mar			2		2
Jun			1		1
<b>Grand Total</b>	<b>23998</b>	<b>29043</b>	<b>6353</b>	<b>29128</b>	<b>88522</b>

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 14**

“How many of FE PA confirmed low income customers received a LIHEAP Cash and/or Crisis grant in the following program years, disaggregated by program year and grant type (Cash Only, Crisis Only, Both Cash and Crisis, Supplemental): (a) 2019-2020 program year; (b) 2020-2021 program year; (c) 2021-2022 program year; (d) 2022-2023 program year; and (e) 2023-2024 program year, to date.

Please also identify the total LIHEAP dollars received by FE PA on behalf of LIHEAP recipients for each program year.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set I, No. 14, Attachment A.

COMPANY	PROGRAM YEAR	CASH	CRISIS	BOTH	TOTAL DOLLARS
PP	2019 to 2020	2847	1220	976	\$1,309,880
PP	2020 to 2021	2346	653	420	\$1,343,963
PP	2021 to 2022	3374	1137	968	\$3,030,445
PP	2022 to 2023	2712	1303	707	\$2,320,722
PP	2023 to 2024	1876	300	156	\$821,831
ME	2019 to 2020	7794	2663	1928	\$3,290,821
ME	2020 to 2021	7008	1525	1168	\$3,632,998
ME	2021 to 2022	9025	1944	1604	\$7,719,677
ME	2022 to 2023	4569	2719	652	\$3,662,217
ME	2023 to 2024	5514	1171	606	\$2,585,239
PN	2019 to 2020	11257	4217	3078	\$4,881,020
PN	2020 to 2021	9974	2590	1457	\$5,578,887
PN	2021 to 2022	13394	4114	3110	\$11,630,564
PN	2022 to 2023	11533	5091	2403	\$9,425,742
PN	2023 to 2024	11009	2385	1268	\$5,396,964
WP	2019 to 2020	12823	4520	3621	\$5,582,321
WP	2020 to 2021	11204	2539	1695	\$6,063,007
WP	2021 to 2022	13745	3516	2814	\$11,991,693
WP	2022 to 2023	12650	4538	2621	\$9,742,106
WP	2023 to 2024	9105	2135	965	\$4,460,079
FE PA	2019 to 2020				\$15,064,043
FE PA	2020 to 2021				\$16,618,855
FE PA	2021 to 2022				\$34,372,379
FE PA	2022 to 2023				\$25,150,787
FE PA	2023 to 2024				\$13,264,114

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 15**

“As of the most current date, how many estimated low income customers reside in FE PA’s service territory? Please explain how FE PA arrived at its estimated figures and include citation and/or copies of any and all workpapers used to perform this estimation.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set I, No. 15 Attachment A for the current estimated number of low-income customers residing in FE PA’s service territory.

Estimates are calculated by taking the December 2023 residential customer count and multiplying it by the percentage of estimated residential customers <150% of the Federal Poverty Income Guidelines for each rate district.

See CAUSE-PA Set I, No. 015 Attachment B for the 2023 Needs Assessment used to obtain the estimated percentage of low-income customers. The source used to create the needs assessment was the 2018-2022 American Community Survey 5-Year Estimates- United States Census Bureau.

<b>Total Number (#) Residential Customers - By Month:</b>	<b>Met-Ed</b>	<b>Penelec</b>	<b>Penn Power</b>	<b>West Penn Power</b>
January	517,308	501,295	149,454	632,675
February	517,593	501,328	149,479	632,814
March	517,761	501,388	149,557	632,931
April	517,446	500,939	149,507	632,486
May	517,647	500,515	149,496	632,401
June	517,869	500,337	150,364	632,398
July	518,004	500,270	149,573	632,632
August	518,222	500,361	149,595	632,798
September	518,432	500,276	149,584	632,652
October	518,675	500,459	149,722	633,058
November	519,313	500,980	149,930	633,681
December	519,719	501,154	149,958	634,023
<b>Total Number(#) Low Income Households (Accounts) (Estimated)</b>	<b>109,115</b>	<b>145,179</b>	<b>34,400</b>	<b>147,803</b>

Source for Low Income Percentage: 2018-2022 American Community Survey  
5-year estimates - United States Census Bureau

Met-Ed	<b>20.955%</b>
Penelec	<b>28.969%</b>
Penn Power	<b>22.940%</b>
West Penn Power	<b>23.312%</b>

2023 Needs Assessment

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

December 2023 Customer Count

Met-Ed 2023 Needs Assessment						
County	Total Households	Households Under 150% of poverty	Percentage of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % 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>

County	Res. Cust.	% Total
Adams	31,016	5.97%
Berks	130,527	25.13%
Bucks	5,222	1.01%
Chester	1,153	0.22%
Cumberland	11,034	2.12%
Dauphin	5,942	1.14%
Lancaster	1,996	0.38%
Lebanon	54,078	10.41%
Lehigh	3,790	0.73%
Monroe	21,967	4.23%
Montgomery	11,990	2.31%
Northampton	60,993	11.74%
Pike	15,882	3.06%
York	163,844	31.54%
<b>Total</b>	<b>519,434</b>	<b>99.99%</b>

**Penelec 2023 Needs Assessment**

County	Total Households	Households Under 150% of poverty	Percentage of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % total
Armstrong	27767	6764	0.2436	98	24	
Bedford	19571	5341	0.2729	10001	2729	
Blair	50587	13918	0.2751	48477	13336	
Bradford	24361	6824	0.2801	19525	5469	
Cambria	55541	16318	0.2938	54400	15983	
Centre	58285	17691	0.3035	4438	1347	
Clarion	14808	4578	0.3092	4914	1519	
Clearfield	31741	8864	0.2793	29689	8292	
Crawford	33191	10328	0.3112	22134	6888	
Cumberland	104053	17997	0.173	5297	916	
Erie	109474	33375	0.3049	106706	32535	
Forest	1844	700	0.3796	3455	1312	
Franklin	62576	13976	0.2233	5124	1144	
Huntington	15771	4091	0.2594	11479	2978	
Indiana	32285	9728	0.3013	22541	6792	
Jefferson	18018	5549	0.308	14090	4340	
Juniata	8852	2269	0.2563	720	185	
Lycoming	45705	12186	0.2666	723	193	
McKean	15931	4977	0.3124	13977	4366	
Mifflin	18612	6718	0.3609	19447	7018	
Perry	18066	3601	0.1993	981	196	
Potter	6595	2069	0.3137	2486	780	
Somerset	28956	7610	0.2628	26541	6975	
Sullivan	2462	615	0.2498	2894	723	
Susquehanna	15641	4013	0.2566	11766	3019	
Tioga	16583	4523	0.2727	13944	3803	
Venango	21323	6362	0.2984	18397	5490	
Warren	16209	4440	0.2739	14729	4034	
Wayne	19747	4928	0.2496	3116	778	
Westmoreland	153237	31629	0.2064	1975	408	
Wyoming	10788	2442	0.2264	7053	1597	
<b>Total</b>	<b>1058580</b>	<b>274424</b>	<b>0.2592</b>	<b>501117</b>	<b>145169</b>	<b>28.97%</b>

## Penelec Continued

County	Res. Cust.	% Total
Armstrong	98	0.02%
Bedford	10001	2.00%
Blair	48477	9.67%
Bradford	19525	3.90%
Cambria	54400	10.86%
Centre	4438	0.89%
Clarion	4914	0.98%
Clearfield	29689	5.92%
Crawford	22134	4.42%
Cumberland	5297	1.06%
Erie	106706	21.29%
Forest	3455	0.69%
Franklin	5124	1.02%
Huntington	11479	2.29%
Indiana	22541	4.50%
Jefferson	14090	2.81%
Juniata	720	0.14%
Lycoming	723	0.14%
McKean	13977	2.79%
Mifflin	19447	3.88%
Perry	981	0.20%
Potter	2486	0.50%
Somerset	26541	5.30%
Sullivan	2894	0.58%
Susquehanna	11766	2.35%
Tioga	13944	2.78%
Venango	18397	3.67%
Warren	14729	2.94%
Wayne	3116	0.62%
Westmoreland	1975	0.39%
Wyoming	7053	1.41%
Total	501117	100.01%

**Penn Power 2023 Needs Assessment**

County	Total Households	Households Under 150% of poverty	Percentage of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % total
Allegheny	545637	121,529	0.2227	20696	4609	
Beaver	71999	15,859	0.2203	11753	2589	
Butler	79466	14,430	0.1816	32128	5834	
Crawford	33191	10,328	0.3112	6350	1976	
Lawrence	35933	10,399	0.2894	33472	9687	
Mercer	45890	12,250	0.2669	45513	12147	
Venango	21323	6,362	0.2984	21	6	
<b>Total</b>	<b>833439</b>	<b>191,157</b>	<b>0.2294</b>	<b>149933</b>	<b>34395</b>	<b>22.94%</b>

County	Res. Cust.	% Total
Allegheny	20696	13.80%
Beaver	11753	7.84%
Butler	32128	21.43%
Crawford	6350	4.24%
Lawrence	33472	22.32%
Mercer	45513	30.36%
Venango	21	0.01%
<b>Total</b>	<b>149933</b>	<b>100.00%</b>

**West Penn Power 2023 Needs Assessment**

County	Total Households	Households Under 150% of poverty	Percentage of Households Under 150% of Poverty	Res. Cust.	Estimated Residential Customers <150% of Poverty	Estimated Res. Cust. <150% of Poverty % total
Adams	40006	7343	18.35%	1615	296	
Allegheny	545637	121529	22.27%	71960	16025	
Armstrong	27767	6764	24.36%	29414	7165	
Bedford	19571	5341	27.29%	4099	1119	
Blair	50587	13918	27.51%	17	5	
Butler	79466	14430	18.16%	44845	8144	
Cameron	2210	810	36.65%	3444	1262	
Centre	58285	17691	30.35%	55780	16929	
Clarion	14808	4578	30.92%	8793	2719	
Clinton	14877	4339	29.17%	2614	763	
Elk	13485	3234	23.98%	16157	3874	
Fayette	54937	16601	30.22%	60352	18238	
Franklin	62576	13976	22.33%	49360	11022	
Fulton	6126	1437	23.46%	5245	1230	
Greene	13957	3411	24.44%	15837	3871	
Huntingdon	15771	4091	25.94%	1	0	
Indiana	32285	9728	30.13%	1335	402	
Jefferson	18018	5549	30.80%	43	13	
Lycoming	45705	12186	26.66%	492	131	
McKean	15931	4977	31.24%	4343	1357	
Potter	6595	2069	31.37%	2538	796	
Somerset	28956	7610	26.28%	240	63	
Washington	87200	17671	20.26%	94968	19241	
Westmoreland	153237	31629	20.64%	160392	33105	
<b>Total</b>	<b>1407993</b>	<b>330912</b>	<b>23.50%</b>	<b>633884</b>	<b>147770</b>	<b>23.31%</b>

## West Penn Power Continued

County	Res. Cust.	% Total
Adams	1615	0.25%
Allegheny	71960	11.35%
Armstrong	29414	4.64%
Bedford	4099	0.65%
Blair	17	0.00%
Butler	44845	7.07%
Cameron	3444	0.54%
Centre	55780	8.80%
Clarion	8793	1.39%
Clinton	2614	0.41%
Elk	16157	2.55%
Fayette	60352	9.52%
Franklin	49360	7.79%
Fulton	5245	0.83%
Greene	15837	2.50%
Huntingdon	1	0.00%
Indiana	1335	0.21%
Jefferson	43	0.01%
Lycoming	492	0.08%
McKean	4343	0.69%
Potter	2538	0.40%
Somerset	240	0.04%
Washington	94968	14.98%
Westmoreland	160392	25.30%
Total	633884	100.00%

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 16**

“From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

- a. All residential FE PA customers;
- b. Residential FE PA customers, excluding confirmed low income customers and PCAP customers;
- c. Confirmed low income FE PA customers;
- d. Confirmed low income FE PA customers, excluding PCAP customers;
- e. FE PA PCAP customers.

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

- A. See FE PA Response to CAUSE-PA Set I, No. 16, Attachment A.
- B. See FE PA Response to CAUSE-PA Set I, No. 16, Attachment B.
- C. See FE PA Response to CAUSE-PA Set I, No. 16, Attachment C.
- D. See FE PA Response to CAUSE-PA Set I, No. 16, Attachment D.
- E. See FE PA Response to CAUSE-PA Set I, No. 16, Attachment E.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

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Month OpCo	2024				
	ME	PN	PP	WP	FE PA
Jan	85	127	44	61	317
Feb	382	219	65	325	991
Mar	684	655	131	673	2,143
Apr					
May					
Jun					
Jul					
Aug					
Sep					
Oct					
Nov					
Dec					
<b>2024 (YTD)</b>	<b>1,151</b>	<b>1,001</b>	<b>240</b>	<b>1,059</b>	<b>3,451</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

Month OpCo	2023				
	ME	PN	PP	WP	FE PA
Jan	319	271	34	261	885
Feb	347	300	58	239	944
Mar	474	234	33	331	1,072
Apr	3,275	2,206	338	2,423	8,242
May	3,672	3,193	732	3,247	10,844
Jun	2,712	2,416	363	2,292	7,783
Jul	2,659	1,896	460	2,388	7,403
Aug	3,646	2,488	558	2,704	9,396
Sep	3,325	2,440	551	2,322	8,638
Oct	4,870	3,502	745	3,234	12,351
Nov	1,211	354	115	542	2,222
Dec	273	62	1	227	563
<b>2023</b>	<b>26,783</b>	<b>19,362</b>	<b>3,988</b>	<b>20,210</b>	<b>70,343</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

Month OpCo	2022				
	ME	PN	PP	WP	FE PA
Jan	111	94	2	97	304
Feb	561	213	45	343	1,162
Mar	604	617	150	498	1,869
Apr	4,173	2,602	490	2,576	9,841
May	4,057	3,469	536	3,258	11,320
Jun	3,996	2,952	462	3,273	10,683
Jul	3,166	2,509	396	2,492	8,563
Aug	4,264	3,152	511	3,250	11,177
Sep	3,668	1,955	306	2,145	8,074
Oct	2,770	1,762	137	2,238	6,907
Nov	1,257	804	113	758	2,932
Dec	268	102	45	97	512
<b>2022</b>	<b>28,895</b>	<b>20,231</b>	<b>3,193</b>	<b>21,025</b>	<b>73,344</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16a All residential FE PA customers

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

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Month OpCo	2024				
	ME	PN	PP	WP	FE PA
Jan	84	121	41	57	303
Feb	372	212	64	316	964
Mar	666	634	122	656	2,078
Apr					
May					
Jun					
Jul					
Aug					
Sep					
Oct					
Nov					
Dec					
<b>2024 (YTD)</b>	<b>1,122</b>	<b>967</b>	<b>227</b>	<b>1,029</b>	<b>3,345</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

Month OpCo	2023				
	ME	PN	PP	WP	FE PA
Jan	300	256	32	247	835
Feb	334	287	58	229	908
Mar	454	222	32	322	1,030
Apr	2,367	1,583	272	1,769	5,991
May	2,764	2,255	567	2,345	7,931
Jun	2,034	1,770	283	1,706	5,793
Jul	1,872	1,309	342	1,722	5,245
Aug	2,666	1,717	426	1,901	6,710
Sep	2,540	1,739	422	1,710	6,411
Oct	3,803	2,588	602	2,515	9,508
Nov	983	273	89	404	1,749
Dec	267	60	1	220	548
<b>2023</b>	<b>20,384</b>	<b>14,059</b>	<b>3,126</b>	<b>15,090</b>	<b>52,659</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

Month OpCo	2022				
	ME	PN	PP	WP	FE PA
Jan	105	89	2	91	287
Feb	538	202	42	327	1,109
Mar	580	597	143	479	1,799
Apr	3,282	2,051	408	2,030	7,771
May	3,175	2,628	425	2,512	8,740
Jun	3,176	2,305	357	2,617	8,455
Jul	2,457	1,909	313	1,934	6,613
Aug	3,363	2,435	408	2,564	8,770
Sep	2,941	1,484	246	1,701	6,372
Oct	2,255	1,345	100	1,799	5,499
Nov	1,012	612	84	619	2,327
Dec	264	100	44	96	504
<b>2022</b>	<b>23,148</b>	<b>15,757</b>	<b>2,572</b>	<b>16,769</b>	<b>58,246</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16b Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

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Month OpCo	2024				
	ME	PN	PP	WP	FE PA
Jan	-	3	2	4	9
Feb	8	5	-	8	21
Mar	17	18	7	16	58
Apr					-
May					-
Jun					-
Jul					-
Aug					-
Sep					-
Oct					-
Nov					-
Dec					-
<b>2024 (YTD)</b>	<b>25</b>	<b>26</b>	<b>9</b>	<b>28</b>	<b>88</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

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Month OpCo	2023				
	ME	PN	PP	WP	FE PA
Jan	9	6	2	5	22
Feb	3	5	-	5	13
Mar	7	6	1	5	19
Apr	587	455	66	468	1,576
May	637	718	164	679	2,198
Jun	496	487	79	458	1,520
Jul	560	473	118	503	1,654
Aug	717	608	132	608	2,065
Sep	611	571	129	484	1,795
Oct	863	748	143	590	2,344
Nov	191	69	26	118	404
Dec	6	2	-	7	15
<b>2023</b>	<b>4,687</b>	<b>4,148</b>	<b>860</b>	<b>3,930</b>	<b>13,625</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

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Month OpCo	2022				
	ME	PN	PP	WP	FE PA
Jan	2	1	-	4	7
Feb	8	6	1	8	23
Mar	9	8	3	9	29
Apr	511	329	52	346	1,238
May	493	540	76	497	1,606
Jun	498	402	74	442	1,416
Jul	400	365	53	347	1,165
Aug	562	483	75	459	1,579
Sep	507	339	46	321	1,213
Oct	342	291	26	299	958
Nov	184	136	23	99	442
Dec	3	2	1	1	7
<b>2022</b>	<b>3,519</b>	<b>2,902</b>	<b>430</b>	<b>2,832</b>	<b>9,683</b>

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

---

FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

CAUSE Set 1 From 2019 to present, disaggregated by month, year (as of the last day of the month/year), and Rate District, how many FE PA customers were terminated for nonpayment each month, disaggregated by month, year, and the following customer segments:

Question 16c Confirmed low income FE PA customers

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FE PA is unable to disaggregate the number of nonpayment disconnections of Confirmed Low-Income customers, for data greater than 24 months.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 19**

“From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments:

- a. All residential FE PA customers;
- b. Residential FE PA customers, excluding confirmed low income customers and PCAP customers;
- c. Confirmed low income FE PA customers;
- d. Confirmed low income FE PA customers, excluding PCAP customers;
- e. FE PA PCAP customers.

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response CAUSE-PA Set I, No. 19, Attachment A.

CAUSE-PA Set I No.019 From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments: All residential FE PA customers

Note: 2024 data is as of the last day of February

Month	2019				
	ME	PN	PP	WP	FE PA
January	249	195	55	193	692
February	257	232	59	260	808
March	482	453	110	459	1,504
April	1,418	1,319	348	1,319	4,404
May	1,239	1,259	263	1,111	3,872
June	810	803	171	708	2,492
July	881	1,013	241	940	3,075
August	896	953	183	953	2,985
September	802	851	201	838	2,692
October	876	871	239	918	2,904
November	513	476	110	513	1,612
December	260	217	52	228	757

Month	2020				
	ME	PN	PP	WP	FE PA
January	233	182	54	228	697
February	256	216	68	248	788
March	367	315	101	338	1,121
April	309	307	106	306	1,028
May	550	492	122	595	1,759
June	317	261	81	340	999
July	406	432	110	451	1,399
August	672	659	145	677	2,153
September	936	879	237	872	2,924
October	491	500	117	494	1,602
November	491	553	129	485	1,658
December	82	71	19	75	247

Month	2021				
	ME	PN	PP	WP	FE PA
January	73	49	15	63	200
February	64	39	11	50	164
March	371	349	72	341	1,133
April	1,648	1,972	474	2,046	6,140
May	1,795	1,744	367	1,606	5,512
June	984	1,151	274	1,077	3,486
July	978	952	292	1,029	3,251
August	1,242	1,097	207	1,128	3,674
September	1,012	1,064	207	978	3,261
October	479	379	64	367	1,289
November	334	309	82	277	1,002
December	225	202	43	153	623

Month	2022				
	ME	PN	PP	WP	FE PA
January	153	128	34	139	454
February	169	150	36	150	505
March	444	368	84	347	1,243
April	1,121	923	279	928	3,251
May	934	885	228	908	2,955
June	736	671	166	716	2,289
July	708	621	143	614	2,086
August	845	744	203	757	2,549
September	781	633	155	671	2,240
October	705	564	137	630	2,036
November	537	463	102	453	1,555
December	211	203	48	182	644

Month	2023				
	ME	PN	PP	WP	FE PA
January	228	185	50	197	660
February	266	218	52	247	783
March	338	280	80	299	997
April	958	858	191	813	2,820
May	1,043	974	258	996	3,271
June	762	748	190	764	2,464
July	857	764	200	874	2,695
August	930	793	194	809	2,726
September	866	684	214	732	2,496
October	981	819	207	816	2,823
November	503	386	83	408	1,380
December	244	189	40	228	701

Month	2024				
	ME	PN	PP	WP	FE PA
January	256	183	51	226	716
February	281	238	58	237	814

CAUSE-PA Set I No.019 From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments: Residential FE PA customers, excluding confirmed low income customers and PCAP customers;

Note: 2024 data is as of the last day of February

FE PA does not store this type of data alongside of historical time-sliced indicators for confirmed low-income and PCAP customers. As such, the confirmed low-income and PCAP data was disaggregated using a separate lists of accounts.

2019					
Month	ME	PN	PP	WP	FE PA
January	107	87	31	91	316
February	104	81	19	104	308
March	190	144	34	185	553
April	443	365	94	438	1,340
May	401	320	81	327	1,129
June	255	203	42	199	699
July	232	241	57	269	799
August	271	250	48	275	844
September	230	209	61	245	745
October	253	209	68	259	789
November	142	126	38	155	461
December	126	86	24	95	331

2020					
Month	ME	PN	PP	WP	FE PA
January	93	63	24	118	298
February	99	76	20	94	289
March	104	89	25	105	323
April	70	69	23	85	247
May	161	116	37	167	481
June	88	73	20	102	283
July	122	116	31	170	439
August	210	220	48	254	732
September	354	309	95	319	1,077
October	177	181	45	200	603
November	235	226	50	227	738
December	38	31	10	37	116

2021					
Month	ME	PN	PP	WP	FE PA
January	30	19	7	29	85
February	24	21	6	26	77
March	168	126	33	158	485
April	590	646	185	756	2,177
May	612	502	111	499	1,724
June	357	388	70	355	1,170
July	364	302	98	360	1,124
August	425	338	57	372	1,192
September	362	305	60	332	1,059
October	151	123	23	136	433
November	110	95	22	101	328
December	94	72	24	53	243

2022					
Month	ME	PN	PP	WP	FE PA
January	63	62	18	68	211
February	91	64	14	76	245
March	205	128	40	166	539
April	418	337	94	373	1,222
May	322	280	75	349	1,026
June	273	206	44	279	802
July	254	184	41	193	672
August	293	238	59	261	851
September	302	233	50	240	825
October	251	176	50	246	723
November	202	170	37	165	574
December	108	100	19	101	328

2023					
Month	ME	PN	PP	WP	FE PA
January	124	89	22	108	343
February	120	92	22	101	335
March	141	123	32	144	440
April	342	304	64	315	1,025
May	381	315	87	368	1,151
June	286	244	68	268	866
July	302	246	69	325	942
August	349	228	58	268	903
September	169	211	73	269	722
October	360	271	80	281	992
November	198	122	32	162	514
December	111	90	13	123	337

2024					
Month	ME	PN	PP	WP	FE PA
January	112	89	23	112	336
February	128	91	24	104	347

CAUSE-PA Set I No.019 From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments: Confirmed low income FE PA customers

Note: 2024 data is as of the last day of February  
 FE PA does not store this type of data alongside of historical time-sliced indicators for confirmed low-income. As such, the confirmed low-income data was disaggregated using a separate list of confirmed low-income accounts.

2019					
Month	ME	PN	PP	WP	FE PA
January	142	108	24	102	376
February	153	151	40	156	500
March	292	309	76	274	951
April	975	954	254	881	3,064
May	838	939	182	784	2,743
June	555	600	129	509	1,793
July	649	772	184	671	2,276
August	625	703	135	678	2,141
September	572	642	140	593	1,947
October	623	662	171	659	2,115
November	371	350	72	358	1,151
December	134	131	28	133	426

2020					
Month	ME	PN	PP	WP	FE PA
January	140	119	30	110	399
February	157	140	48	154	499
March	263	226	76	233	798
April	239	238	83	221	781
May	389	376	85	428	1,278
June	229	188	61	238	716
July	284	316	79	281	960
August	462	439	97	423	1,421
September	582	570	142	553	1,847
October	314	319	72	294	999
November	256	327	79	258	920
December	44	40	9	38	131

2021					
Month	ME	PN	PP	WP	FE PA
January	43	30	8	34	115
February	40	18	5	24	87
March	203	223	39	183	648
April	1,058	1,326	289	1,290	3,963
May	1,183	1,242	256	1,107	3,788
June	627	763	204	722	2,316
July	614	650	194	669	2,127
August	817	759	150	756	2,482
September	650	759	147	646	2,202
October	328	256	41	231	856
November	224	214	60	176	674
December	131	130	19	100	380

2022					
Month	ME	PN	PP	WP	FE PA
January	90	66	16	71	243
February	78	86	22	74	260
March	239	240	44	181	704
April	703	586	185	555	2,029
May	612	605	153	559	1,929
June	463	465	122	437	1,487
July	454	437	102	421	1,414
August	552	506	144	496	1,698
September	479	400	105	431	1,415
October	454	388	87	384	1,313
November	335	293	65	288	981
December	103	103	29	81	316

2023					
Month	ME	PN	PP	WP	FE PA
January	104	96	28	89	317
February	146	126	30	146	448
March	197	157	48	155	557
April	616	554	127	498	1,795
May	662	659	171	628	2,120
June	476	504	122	496	1,598
July	555	518	131	549	1,753
August	581	565	136	541	1,823
September	697	473	141	463	1,774
October	621	548	127	535	1,831
November	305	264	51	246	866
December	133	99	27	105	364

2024					
Month	ME	PN	PP	WP	FE PA
January	144	94	28	114	380
February	153	147	34	133	467

CAUSE-PA Set I No.019 "From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments": Confirmed low income FE PA customers, excluding PCAP customers

Note: 2024 data is as of the last day of February  
 FE PA does not store this type of data alongside of historical time-sliced indicators for confirmed low-income and PCAP customers. As such, the confirmed low-income and PCAP data was disaggregated using a separate lists of accounts.

2019					
Month	ME	PN	PP	WP	FE PA
January	217	163	45	146	571
February	218	216	53	235	722
March	445	416	106	423	1,390
April	1,324	1,260	336	1,244	4,164
May	1,143	1,211	254	1,036	3,644
June	757	759	158	668	2,342
July	835	968	231	887	2,921
August	827	912	171	886	2,796
September	753	819	181	795	2,548
October	828	834	226	863	2,751
November	489	454	100	484	1,527
December	219	190	43	199	651

2020				
ME	PN	PP	WP	FE PA
199	155	47	181	582
231	188	66	223	708
341	302	93	313	1,049
297	295	104	295	991
500	467	112	545	1,624
284	237	77	314	912
364	399	103	397	1,263
617	608	139	619	1,983
824	800	210	790	2,624
417	452	103	428	1,400
416	481	114	400	1,411
70	63	15	61	209

2021				
ME	PN	PP	WP	FE PA
63	45	12	55	175
57	33	9	45	144
331	317	65	299	1,012
1,471	1,801	418	1,836	5,526
1,598	1,607	334	1,442	4,981
846	1,036	248	961	3,091
854	859	264	919	2,896
1,118	999	193	1,020	3,330
954	978	195	865	2,992
415	335	56	324	1,130
296	285	75	237	893
182	172	34	132	520

2022					
Month	ME	PN	PP	WP	FE PA
January	130	106	25	114	375
February	139	130	30	119	418
March	389	344	77	310	1,120
April	1,027	872	263	861	3,023
May	863	833	215	829	2,740
June	674	622	158	640	2,094
July	640	579	137	566	1,922
August	769	704	193	696	2,362
September	718	583	140	611	2,052
October	646	516	124	572	1,858
November	483	430	92	412	1,417
December	179	175	41	152	547

2023				
ME	PN	PP	WP	FE PA
188	156	42	163	549
239	195	45	220	699
300	258	71	265	894
877	797	182	749	2,605
950	916	136	921	2,923
691	684	173	681	2,229
783	713	185	800	2,481
853	747	175	746	2,521
802	632	201	678	2,313
905	772	193	764	2,634
470	362	76	371	1,279
219	168	39	199	625

2024				
ME	PN	PP	WP	FE PA
234	150	46	197	627
248	216	50	205	

CAUSE-PA Set I No.019 "From 2019 to present, please provide the number of payment troubled customers, disaggregated by month, year (as of the last day of the month/year), Rate District, and the following customer segments": all FE PCAP customers

Note: 2024 data is as of the last day of February  
FE PA does not store this type of data alongside of historical time-sliced indicators for PCAP. As such, the PCAP data was disaggregated using a separate list of PCAP accounts.

Month	2019				FE PA
	ME	PN	PP	WP	
January	-	2	-	3	5
February	2	-	-	-	2
March	-	2	-	2	4
April	7	7	-	4	18
May	11	8	-	5	24
June	6	3	-	3	12
July	1	2	1	2	6
August	8	4	1	4	17
September	5	5	-	-	10
October	1	3	-	4	8
November	1	2	-	3	6
December	1	1	-	1	3

Month	2020				FE PA
	ME	PN	PP	WP	
January	1	2	2	2	7
February	1	1	-	1	3
March	1	2	-	3	6
April	2	1	-	1	4
May	18	4	2	13	37
June	5	7	-	9	21
July	10	11	-	12	33
August	7	5	-	7	19
September	16	5	5	14	40
October	16	12	2	12	42
November	9	8	-	3	20
December	-	1	-	3	4

Month	2021				FE PA
	ME	PN	PP	WP	
January	1	1	-	-	2
February	-	-	-	-	-
March	-	1	-	-	1
April	14	21	7	30	72
May	27	25	3	35	90
June	15	14	6	20	55
July	11	19	2	11	43
August	4	-	1	1	6
September	10	8	1	14	33
October	11	15	2	4	32
November	3	3	1	6	13
December	3	3	-	1	7

Month	2022				FE PA
	ME	PN	PP	WP	
January	-	-	-	-	-
February	-	-	-	-	-
March	-	-	-	-	-
April	-	-	-	-	-
May	-	2	1	3	6
June	3	7	1	11	22
July	7	5	2	11	25
August	9	2	1	11	23
September	5	8	1	5	19
October	4	6	1	4	15
November	5	7	1	3	16
December	-	1	-	-	1

Month	2023				FE PA
	ME	PN	PP	WP	
January	1	1	-	1	3
February	-	-	-	-	-
March	2	2	-	6	10
April	11	11	1	8	31
May	12	9	1	4	26
June	10	14	-	13	37
July	5	9	1	11	26
August	12	5	6	8	31
September	9	11	-	10	30
October	5	12	-	3	20
November	1	2	1	2	6
December	-	2	-	-	2

Month	2024				FE PA
	ME	PN	PP	WP	
January	-	2	-	-	2
February	1	1	-	-	2

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 20**

“Please explain how FE PA defines the term “payment troubled.”

**RESPONSE:**

FE PA defines the term “payment troubled” as a customer who has failed to maintain one or more payment arrangements in a 1-year period.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set I, No. 23**

“From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

- a. All residential FE PA customers;
- b. Residential FE PA customers, excluding confirmed low income customers and PCAP customers;
- c. Confirmed low income FE PA customers;
- d. Confirmed low income FE PA customers, excluding PCAP customers;
- e. FE PA PCAP customers;
- f. FE PA PCAP customers entering PCAP that month.

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Set 1, No. 23, Attachment A, tabs 23a – 23f.

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

Question 23a All residential FE PA customers

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$30,851,508	\$32,191,289	\$31,856,650	\$27,884,888	\$27,249,688	\$27,172,584	\$25,817,167	\$25,634,858	\$25,004,620	\$24,525,535	\$24,928,999	\$26,614,680	\$29,142,027	\$30,389,347	\$44,831,181	\$33,145,550	\$34,895,168	\$35,489,871	\$36,937,894	\$38,945,660	\$39,927,410	\$35,778,173	\$44,193,450	\$45,703,772
Penelec	\$36,009,713	\$37,350,729	\$36,377,719	\$32,353,941	\$30,821,574	\$31,003,589	\$29,347,186	\$28,947,440	\$28,253,525	\$27,849,070	\$28,327,739	\$30,667,341	\$34,035,078	\$35,506,995	\$51,443,857	\$36,821,793	\$38,170,784	\$39,027,808	\$41,000,663	\$43,448,625	\$45,027,307	\$40,760,749	\$50,073,282	\$52,626,474
Penn Power	\$9,143,451	\$9,523,410	\$9,243,300	\$8,165,451	\$7,893,682	\$7,810,452	\$7,436,049	\$7,458,844	\$7,078,290	\$6,885,522	\$7,126,710	\$7,797,016	\$8,629,322	\$8,880,996	\$12,705,502	\$9,280,698	\$9,508,780	\$9,659,726	\$10,053,145	\$10,580,335	\$10,971,571	\$11,145,722	\$12,233,536	\$12,747,790
West Penn Power	\$41,021,967	\$42,547,280	\$41,955,662	\$37,665,269	\$35,810,908	\$35,417,259	\$33,441,714	\$32,911,591	\$32,131,751	\$31,345,862	\$32,273,125	\$34,863,688	\$38,097,613	\$39,378,307	\$54,504,600	\$41,773,531	\$42,804,983	\$43,447,689	\$45,083,217	\$47,318,881	\$48,864,275	\$44,590,922	\$53,425,176	\$55,321,498
All FirstEnergy PA	\$117,026,640	\$121,612,708	\$119,433,331	\$106,069,549	\$101,775,852	\$101,403,884	\$96,042,115	\$94,952,733	\$92,468,186	\$90,605,989	\$92,656,574	\$99,942,734	\$109,904,040	\$114,105,645	\$163,485,139	\$121,021,572	\$125,379,716	\$127,625,093	\$133,074,919	\$140,293,503	\$144,790,564	\$132,275,567	\$159,927,443	\$166,399,535
Company	Average																							
Met-Ed	\$509	\$549	\$555	\$495	\$485	\$484	\$480	\$461	\$443	\$433	\$443	\$471	\$509	\$537	\$918	\$574	\$617	\$649	\$507	\$707	\$719	\$707	\$787	\$797
Penelec	\$525	\$568	\$576	\$523	\$498	\$494	\$488	\$471	\$460	\$452	\$464	\$490	\$532	\$569	\$964	\$612	\$652	\$679	\$525	\$729	\$750	\$751	\$831	\$826
Penn Power	\$569	\$609	\$620	\$552	\$532	\$526	\$513	\$489	\$481	\$481	\$500	\$528	\$581	\$615	\$983	\$645	\$686	\$713	\$598	\$767	\$779	\$814	\$861	\$856
West Penn Power	\$560	\$602	\$611	\$536	\$526	\$520	\$517	\$500	\$485	\$476	\$490	\$519	\$567	\$603	\$957	\$636	\$672	\$697	\$575	\$749	\$764	\$773	\$826	\$836
All FirstEnergy PA	\$536	\$577	\$585	\$528	\$507	\$502	\$498	\$481	\$466	\$457	\$470	\$497	\$541	\$575	\$950	\$611	\$651	\$678	\$540	\$732	\$748	\$750	\$819	\$823

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$46,365,658	\$46,850,626	\$44,831,181	\$42,790,014	\$40,238,696	\$38,709,694	\$38,151,574	\$36,410,181	\$36,943,590	\$35,778,173	\$35,094,302	\$36,127,484	\$38,261,674	\$38,950,696	\$38,898,706	\$36,016,974	\$33,556,501	\$31,770,321	\$31,513,164	\$28,745,191	\$29,068,687	\$28,434,306	\$28,604,895	\$31,587,181
Penelec	\$53,668,864	\$54,583,416	\$51,443,857	\$48,867,447	\$46,157,066	\$44,422,546	\$43,683,725	\$42,212,269	\$42,062,421	\$40,760,749	\$40,099,775	\$41,617,702	\$44,425,659	\$45,261,390	\$44,766,364	\$41,651,956	\$38,951,449	\$37,016,989	\$36,464,497	\$33,659,044	\$33,488,058	\$32,502,216	\$32,765,748	\$36,309,777
Penn Power	\$13,051,901	\$13,267,207	\$12,705,502	\$12,299,007	\$12,047,144	\$11,689,589	\$11,359,557	\$11,010,214	\$11,334,483	\$11,145,722	\$10,991,045	\$11,421,110	\$11,984,688	\$12,198,560	\$12,134,663	\$11,364,658	\$10,770,181	\$10,155,267	\$10,055,295	\$9,347,511	\$9,529,422	\$9,381,970	\$9,527,541	\$10,444,592
West Penn Power	\$56,149,702	\$57,012,249	\$54,504,600	\$51,842,911	\$49,912,304	\$48,314,500	\$47,324,855	\$45,817,290	\$45,868,561	\$44,590,912	\$43,831,053	\$45,220,175	\$47,219,857	\$48,121,687	\$47,892,342	\$44,074,565	\$40,803,575	\$38,305,030	\$37,200,466	\$33,989,681	\$34,280,380	\$33,274,386	\$33,560,398	\$36,870,010
All FirstEnergy PA	\$169,236,126	\$171,713,498	\$163,485,139	\$155,799,378	\$148,355,211	\$143,136,329	\$140,519,712	\$135,449,954	\$136,209,656	\$132,275,567	\$130,016,175	\$134,386,471	\$141,891,878	\$144,532,383	\$143,692,075	\$133,108,152	\$124,081,706	\$117,247,607	\$115,233,421	\$105,741,426	\$106,366,547	\$103,992,879	\$104,458,583	\$115,211,559
Company	Average																							
Met-Ed	\$835	\$876	\$918	\$906	\$822	\$822	\$805	\$787	\$737	\$707	\$702	\$717	\$729	\$762	\$760	\$688	\$648	\$626	\$593	\$576	\$557	\$541	\$538	\$564
Penelec	\$875	\$925	\$964	\$969	\$881	\$873	\$849	\$826	\$782	\$751	\$744	\$754	\$766	\$801	\$814	\$756	\$707	\$686	\$649	\$640	\$606	\$594	\$596	\$608
Penn Power	\$902	\$946	\$983	\$980	\$921	\$918	\$894	\$893	\$842	\$814	\$816	\$818	\$844	\$880	\$885	\$838	\$793	\$763	\$724	\$723	\$696	\$685	\$688	\$703
West Penn Power	\$881	\$922	\$957	\$955	\$883	\$877	\$858	\$847	\$802	\$773	\$778	\$783	\$799	\$838	\$837	\$780	\$728	\$691	\$651	\$639	\$602	\$587	\$585	\$597
All FirstEnergy PA	\$867	\$912	\$950	\$947	\$868	\$863	\$843	\$827	\$780	\$750	\$749	\$758	\$772	\$808	\$811	\$750	\$703	\$676	\$639	\$627	\$597	\$583	\$583	\$599

Company	2023												2024	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Met-Ed	\$33,493,479	\$34,894,905	\$35,606,192	\$34,833,246	\$32,132,030	\$32,510,242	\$31,472,061	\$30,750,721	\$30,921,538	\$29,261,542	\$31,321,157	\$34,591,313	\$36,310,889	\$38,876,660
Penelec	\$38,872,677	\$40,082,599	\$40,419,409	\$39,806,000	\$36,195,235	\$35,933,690	\$35,534,406	\$34,956,935	\$34,611,594	\$33,461,303	\$35,365,686	\$39,270,314	\$41,767,602	\$43,950,603
Penn Power	\$10,903,072	\$11,122,431	\$11,160,706	\$11,252,480	\$10,022,879	\$9,793,345	\$9,589,647	\$9,239,713	\$9,094,021	\$8,660,721	\$9,069,475	\$9,978,460	\$10,447,295	\$10,911,788
West Penn Power	\$38,962,412	\$40,564,680	\$41,233,858	\$40,613,306	\$36,925,728	\$36,645,374	\$34,676,860	\$34,564,525	\$34,089,884	\$32,779,106	\$34,522,279	\$38,092,344	\$40,235,712	\$42,295,302
All FirstEnergy PA	\$122,131,640	\$126,664,616	\$128,420,165	\$126,505,033	\$115,275,873	\$111,270,975	\$109,501,894	\$108,717,036	\$104,162,762	\$110,278,597	\$121,932,431	\$134,892,375	\$128,761,498	\$136,034,444
Company	Average													
Met-Ed	\$611	\$654	\$675	\$619	\$589	\$580	\$590	\$583	\$560	\$542	\$550	\$585	\$640	\$684
Penelec	\$654	\$703	\$724	\$677	\$636	\$610	\$628	\$623	\$602	\$596	\$601	\$634	\$689	\$736
Penn Power	\$758	\$797	\$819	\$776	\$725	\$692	\$706	\$686	\$650	\$642	\$640	\$671	\$734	\$777
West Penn Power	\$642	\$686	\$717	\$664	\$630	\$604	\$625	\$602	\$573	\$560	\$563	\$597	\$653	\$694
All FirstEnergy PA	\$645	\$690	\$715	\$663	\$627	\$605	\$622	\$609	\$584	\$572	\$577	\$610	\$666	\$710

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

**Question 23b** Residential FE PA customers, excluding confirmed low income customers and PCAP customers

Note 1: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "confirmed low income" in alignment with PA regulatory income levels. As such, the confirmed low-income arrears data sets include accounts that were determined to be confirmed low income during the month/year for which data was provided.

Note 2: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "PCAP" in alignment with PA regulatory income levels. As such, the PCAP arrears data sets include accounts that were determined to be PCAP during the month/year for which data was provided.

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$8,162,635	\$8,305,607	\$8,462,241	\$7,716,222	\$7,715,388	\$7,608,060	\$6,913,343	\$6,922,662	\$6,754,801	\$6,648,369	\$6,775,573	\$7,002,397	\$7,424,689	\$7,746,870	\$11,506,674	\$8,628,132	\$9,148,620	\$9,209,497	\$9,630,384	\$10,314,428	\$10,672,547	\$10,518,163	\$14,896,097	\$14,192,179
Penelac	\$8,449,268	\$8,520,380	\$8,414,979	\$7,692,741	\$7,674,631	\$7,715,217	\$7,071,704	\$7,085,355	\$6,917,909	\$6,820,622	\$6,866,429	\$7,248,266	\$7,853,103	\$8,104,900	\$12,083,303	\$8,222,720	\$8,653,483	\$8,823,380	\$9,408,460	\$10,221,035	\$10,808,357	\$10,935,341	\$14,861,149	\$14,940,618
Penn Power	\$2,396,123	\$2,434,054	\$2,437,008	\$2,146,100	\$2,189,737	\$2,157,849	\$2,015,753	\$2,099,715	\$1,950,097	\$1,863,725	\$1,936,669	\$2,070,366	\$2,221,115	\$2,232,994	\$3,353,253	\$2,333,730	\$2,425,016	\$2,400,333	\$2,529,126	\$2,715,703	\$2,890,453	\$3,216,349	\$3,851,514	\$3,894,751
West Penn Power	\$11,104,253	\$11,210,959	\$11,079,526	\$10,210,104	\$10,127,974	\$10,006,862	\$8,963,996	\$9,091,538	\$9,047,280	\$8,738,230	\$8,843,699	\$9,252,398	\$9,666,822	\$9,888,364	\$14,586,977	\$10,460,480	\$10,829,234	\$10,948,754	\$11,494,752	\$12,350,478	\$13,035,840	\$13,178,303	\$17,477,082	\$17,052,061
All FirstEnergy PA	\$30,112,279	\$30,470,999	\$30,393,754	\$27,767,167	\$27,707,731	\$27,487,988	\$24,964,795	\$25,169,271	\$24,670,088	\$24,070,947	\$24,422,370	\$25,573,427	\$27,165,729	\$27,973,128	\$41,530,206	\$29,645,062	\$31,056,353	\$31,381,965	\$33,062,722	\$35,601,644	\$37,407,197	\$37,848,155	\$51,085,842	\$50,079,609
Company	Average												Average											
Met-Ed	\$322	\$345	\$351	\$317	\$313	\$310	\$305	\$308	\$273	\$264	\$278	\$299	\$322	\$336	\$594	\$358	\$390	\$416	\$343	\$461	\$472	\$446	\$560	\$541
Penelac	\$337	\$361	\$366	\$332	\$321	\$317	\$313	\$300	\$289	\$281	\$295	\$315	\$343	\$359	\$637	\$381	\$431	\$432	\$473	\$494	\$479	\$586	\$554	\$554
Penn Power	\$371	\$391	\$405	\$353	\$349	\$344	\$356	\$342	\$320	\$311	\$332	\$353	\$386	\$399	\$664	\$404	\$433	\$449	\$391	\$496	\$511	\$519	\$613	\$589
West Penn Power	\$353	\$375	\$378	\$344	\$331	\$325	\$318	\$310	\$301	\$290	\$300	\$317	\$346	\$366	\$631	\$377	\$403	\$423	\$360	\$472	\$486	\$480	\$565	\$554
All FirstEnergy PA	\$341	\$364	\$369	\$334	\$324	\$320	\$316	\$303	\$291	\$281	\$295	\$314	\$341	\$357	\$625	\$374	\$404	\$425	\$355	\$471	\$486	\$473	\$573	\$553

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$12,777,649	\$12,626,847	\$11,506,674	\$11,509,485	\$11,672,608	\$11,298,218	\$11,009,860	\$10,380,895	\$10,888,426	\$10,518,163	\$12,921,138	\$12,032,790	\$10,933,819	\$10,828,278	\$10,893,112	\$10,782,884	\$10,108,870	\$9,523,657	\$9,640,330	\$8,507,890	\$8,835,884	\$8,719,650	\$8,837,113	\$9,728,865
Penelac	\$13,849,817	\$13,763,300	\$12,083,303	\$11,940,547	\$11,984,301	\$11,652,639	\$11,328,504	\$10,958,963	\$11,162,255	\$10,935,341	\$13,631,332	\$12,819,687	\$12,040,233	\$12,021,573	\$11,645,694	\$11,009,684	\$10,530,010	\$9,857,961	\$9,871,201	\$9,037,922	\$9,314,676	\$9,063,628	\$9,331,414	\$10,293,811
Penn Power	\$3,665,406	\$3,648,994	\$3,353,253	\$3,337,447	\$3,501,160	\$3,358,452	\$3,244,659	\$3,088,189	\$3,284,754	\$3,216,349	\$3,987,722	\$3,816,320	\$3,417,980	\$3,371,358	\$3,308,433	\$3,024,626	\$2,854,499	\$2,959,387	\$2,886,139	\$2,844,982	\$2,826,302	\$2,888,835	\$3,121,645	\$3,121,645
West Penn Power	\$15,941,871	\$15,861,323	\$14,586,977	\$14,413,661	\$14,768,683	\$14,306,548	\$13,982,642	\$13,420,098	\$13,540,861	\$13,178,303	\$15,834,355	\$15,173,420	\$13,786,848	\$13,594,908	\$13,509,878	\$12,785,114	\$11,913,098	\$11,117,618	\$11,051,031	\$9,991,093	\$10,316,570	\$10,197,327	\$10,427,723	\$11,454,422
All FirstEnergy PA	\$46,234,742	\$46,900,463	\$41,530,206	\$41,195,139	\$41,926,752	\$40,615,857	\$39,565,664	\$37,848,145	\$38,885,296	\$37,848,155	\$46,374,546	\$43,842,216	\$40,178,881	\$39,816,117	\$39,357,117	\$37,758,666	\$35,576,604	\$33,353,734	\$33,531,950	\$30,223,043	\$31,312,112	\$30,806,907	\$31,485,086	\$34,598,743
Company	Average												Average											
Met-Ed	\$530	\$565	\$594	\$588	\$546	\$559	\$536	\$526	\$471	\$446	\$493	\$483	\$460	\$481	\$475	\$443	\$421	\$411	\$392	\$375	\$367	\$355	\$356	\$375
Penelac	\$569	\$612	\$637	\$654	\$591	\$600	\$567	\$552	\$502	\$479	\$532	\$518	\$505	\$529	\$529	\$489	\$463	\$452	\$426	\$418	\$401	\$396	\$411	\$414
Penn Power	\$603	\$639	\$664	\$656	\$627	\$634	\$614	\$612	\$548	\$519	\$587	\$569	\$549	\$567	\$562	\$544	\$513	\$496	\$480	\$474	\$464	\$461	\$473	\$476
West Penn Power	\$569	\$603	\$631	\$633	\$590	\$594	\$574	\$565	\$508	\$480	\$535	\$522	\$505	\$525	\$515	\$489	\$459	\$436	\$414	\$404	\$378	\$376	\$382	\$389
All FirstEnergy PA	\$560	\$597	\$625	\$627	\$580	\$588	\$564	\$553	\$498	\$473	\$525	\$513	\$495	\$517	\$511	\$479	\$453	\$438	\$416	\$405	\$388	\$382	\$389	\$399

Company	2023												2024		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Met-Ed	\$9,908,765	\$10,138,661	\$10,482,287	\$11,173,414	\$10,202,358	\$10,476,913	\$9,827,022	\$9,506,095	\$9,818,047	\$9,092,655	\$9,857,929	\$10,914,716	\$10,879,099	\$11,644,404	\$11,879,619
Penelac	\$10,556,600	\$10,563,186	\$10,788,140	\$11,500,598	\$10,525,984	\$10,633,192	\$10,241,876	\$9,945,580	\$9,967,646	\$9,576,640	\$10,150,319	\$11,308,809	\$11,519,397	\$12,010,956	\$11,594,099
Penn Power	\$3,096,921	\$3,100,084	\$3,254,632	\$3,385,384	\$2,992,415	\$3,046,057	\$3,008,270	\$2,834,569	\$2,862,403	\$2,666,528	\$2,824,803	\$3,020,896	\$3,006,281	\$3,127,067	\$3,187,134
West Penn Power	\$11,573,032	\$11,953,677	\$12,082,985	\$12,687,819	\$11,440,572	\$11,579,015	\$10,472,717	\$10,576,954	\$10,665,051	\$10,146,360	\$10,841,868	\$11,853,016	\$11,906,801	\$12,358,380	\$12,557,033
All FirstEnergy PA	\$35,135,318	\$35,755,608	\$36,608,045	\$38,747,215	\$35,161,329	\$35,735,178	\$33,549,885	\$32,863,198	\$33,313,147	\$31,482,183	\$33,674,919	\$37,097,437	\$37,311,578	\$39,140,807	\$39,217,884
Company	Average												Average		
Met-Ed	\$404	\$436	\$448	\$415	\$397	\$395	\$405	\$403	\$385	\$365	\$370	\$400	\$436	\$461	\$470
Penelac	\$445	\$478	\$490	\$463	\$439	\$423	\$444	\$437	\$419	\$411	\$411	\$441	\$479	\$504	\$505
Penn Power	\$515	\$541	\$566	\$520	\$489	\$481	\$513	\$487	\$462	\$448	\$448	\$464	\$511	\$533	\$531
West Penn Power	\$420	\$451	\$471	\$432	\$414	\$401	\$423	\$408	\$386	\$371	\$373	\$401	\$438	\$457	\$460
All FirstEnergy PA	\$429	\$461	\$476	\$442	\$421	\$411	\$430	\$421	\$401	\$386	\$388	\$417	\$455	\$478	\$481

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

Question 23c Confirmed low income FE PA customers

Note 1: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "confirmed low income" in alignment with PA regulatory income levels. As such, the confirmed low-income arrears data sets include accounts that were determined to be confirmed low income during the month/year for which data was provided.

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$22,685,298	\$23,881,556	\$23,387,457	\$20,160,718	\$19,526,434	\$19,555,626	\$18,893,456	\$18,701,044	\$18,245,948	\$17,874,231	\$18,149,439	\$19,610,048	\$21,715,214	\$22,640,189	\$33,317,653	\$24,513,900	\$25,743,696	\$26,275,999	\$27,304,320	\$28,628,323	\$29,251,985	\$25,250,428	\$29,293,136	\$31,506,399
Penelec	\$27,559,031	\$28,828,513	\$27,960,832	\$24,658,599	\$23,146,859	\$23,287,485	\$22,273,906	\$21,860,777	\$21,334,479	\$21,026,570	\$21,459,995	\$23,417,068	\$26,180,677	\$27,400,941	\$39,356,928	\$28,597,858	\$29,516,000	\$30,203,325	\$31,589,255	\$33,224,996	\$34,216,372	\$29,824,031	\$35,210,465	\$37,682,050
Penn Power	\$6,747,323	\$7,088,775	\$6,805,781	\$6,016,494	\$5,703,940	\$5,652,603	\$5,420,290	\$5,389,129	\$5,128,018	\$5,021,797	\$5,190,041	\$5,726,061	\$6,407,470	\$6,647,443	\$9,352,248	\$6,946,288	\$7,083,218	\$7,259,076	\$7,523,994	\$7,864,632	\$8,081,117	\$7,929,059	\$8,382,022	\$8,853,039
West Penn Power	\$29,916,426	\$31,334,667	\$30,873,073	\$27,450,496	\$25,680,246	\$25,405,513	\$24,475,777	\$23,817,956	\$23,083,709	\$22,603,043	\$23,424,986	\$25,605,885	\$28,425,458	\$29,433,683	\$39,907,147	\$31,304,878	\$31,972,099	\$32,495,714	\$33,584,949	\$34,965,312	\$35,825,496	\$31,409,636	\$35,943,103	\$38,263,556
All FirstEnergy PA	\$86,908,077	\$91,133,512	\$89,027,142	\$78,286,307	\$74,057,480	\$73,901,227	\$71,063,429	\$69,768,906	\$67,792,154	\$66,525,641	\$68,224,461	\$74,359,063	\$82,728,819	\$86,122,256	\$121,933,976	\$91,362,924	\$94,315,013	\$96,234,114	\$100,002,518	\$104,683,263	\$107,374,971	\$94,413,155	\$108,828,725	\$116,305,045
Company	Average												Average											
Met-Ed	\$643	\$691	\$703	\$629	\$620	\$619	\$608	\$593	\$576	\$567	\$570	\$592	\$635	\$676	\$1,131	\$728	\$779	\$807	\$876	\$876	\$889	\$935	\$991	\$1,015
Penelec	\$633	\$684	\$697	\$637	\$610	\$606	\$593	\$578	\$569	\$564	\$568	\$591	\$637	\$688	\$1,144	\$742	\$787	\$816	\$816	\$874	\$896	\$948	\$1,009	\$1,027
Penn Power	\$701	\$753	\$764	\$692	\$664	\$659	\$648	\$636	\$611	\$602	\$616	\$644	\$705	\$751	\$1,187	\$808	\$857	\$885	\$885	\$945	\$958	\$1,057	\$1,058	\$1,070
West Penn Power	\$716	\$768	\$785	\$720	\$687	\$681	\$670	\$652	\$638	\$633	\$644	\$675	\$723	\$772	\$1,179	\$825	\$868	\$893	\$893	\$945	\$965	\$1,039	\$1,064	\$1,080
All FirstEnergy PA	\$668	\$718	\$732	\$666	\$642	\$637	\$626	\$610	\$596	\$590	\$596	\$622	\$669	\$716	\$1,155	\$769	\$815	\$843	\$843	\$902	\$921	\$981	\$1,025	\$1,044

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$33,583,858	\$34,218,446	\$33,317,653	\$31,277,773	\$28,554,476	\$27,400,857	\$27,131,846	\$26,021,254	\$26,045,173	\$25,250,428	\$22,163,091	\$24,086,884	\$27,320,063	\$28,130,315	\$28,003,322	\$25,232,037	\$23,445,027	\$22,242,330	\$21,865,086	\$20,232,246	\$20,206,364	\$19,684,754	\$19,737,613	\$21,825,852
Penelec	\$39,815,235	\$40,816,128	\$39,356,928	\$36,922,223	\$34,169,369	\$32,766,321	\$32,352,591	\$31,247,380	\$30,894,222	\$29,824,031	\$26,467,023	\$28,796,897	\$32,383,853	\$33,239,286	\$33,119,960	\$30,641,299	\$28,418,223	\$27,156,450	\$26,588,947	\$24,618,206	\$24,170,248	\$23,435,604	\$23,429,200	\$26,010,970
Penn Power	\$9,386,425	\$9,618,213	\$9,352,248	\$8,958,855	\$8,545,499	\$8,330,651	\$8,114,441	\$7,921,650	\$8,049,477	\$7,929,059	\$7,002,803	\$7,604,289	\$8,566,133	\$8,827,202	\$8,826,194	\$8,183,476	\$7,745,555	\$7,300,767	\$7,095,908	\$6,661,357	\$6,684,440	\$6,555,605	\$6,638,706	\$7,320,382
West Penn Power	\$40,201,784	\$41,144,962	\$39,907,147	\$37,422,613	\$35,139,737	\$34,006,235	\$33,340,509	\$32,392,801	\$32,314,108	\$31,409,636	\$27,994,118	\$30,043,398	\$33,429,486	\$34,522,524	\$34,379,995	\$31,286,160	\$28,886,301	\$27,182,885	\$26,132,585	\$23,990,429	\$23,955,723	\$23,056,270	\$23,110,336	\$25,406,446
All FirstEnergy PA	\$122,987,301	\$125,797,749	\$121,933,976	\$114,581,464	\$106,409,073	\$102,504,064	\$100,939,387	\$97,583,085	\$97,302,980	\$94,413,155	\$83,627,035	\$90,531,468	\$101,699,536	\$104,709,328	\$104,329,471	\$95,342,973	\$88,495,106	\$83,882,632	\$81,683,426	\$75,502,237	\$75,016,773	\$72,732,233	\$72,915,855	\$80,563,650
Company	Average												Average											
Met-Ed	\$1,069	\$1,100	\$1,131	\$1,130	\$1,037	\$1,020	\$1,012	\$982	\$964	\$935	\$934	\$946	\$952	\$984	\$991	\$900	\$844	\$805	\$767	\$744	\$720	\$704	\$697	\$727
Penelec	\$1,077	\$1,118	\$1,144	\$1,149	\$1,055	\$1,042	\$1,029	\$1,000	\$979	\$948	\$937	\$946	\$949	\$984	\$1,005	\$940	\$879	\$845	\$805	\$794	\$754	\$735	\$727	\$745
Penn Power	\$1,118	\$1,157	\$1,187	\$1,201	\$1,141	\$1,120	\$1,095	\$1,088	\$1,077	\$1,057	\$1,050	\$1,049	\$1,073	\$1,116	\$1,128	\$1,061	\$1,009	\$966	\$917	\$918	\$883	\$866	\$858	\$880
West Penn Power	\$1,125	\$1,159	\$1,179	\$1,188	\$1,116	\$1,097	\$1,084	\$1,068	\$1,060	\$1,039	\$1,047	\$1,046	\$1,053	\$1,094	\$1,110	\$1,031	\$959	\$908	\$859	\$843	\$809	\$781	\$769	\$786
All FirstEnergy PA	\$1,093	\$1,129	\$1,155	\$1,160	\$1,079	\$1,060	\$1,047	\$1,023	\$1,008	\$981	\$980	\$986	\$991	\$1,028	\$1,043	\$966	\$904	\$863	\$820	\$804	\$771	\$750	\$742	\$763

Company	2023												2024		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Met-Ed	\$23,550,649	\$24,720,459	\$25,083,571	\$23,592,197	\$21,925,757	\$22,030,659	\$21,641,721	\$21,240,180	\$21,094,743	\$20,156,006	\$21,446,524	\$23,659,452	\$25,422,195	\$27,220,771	\$27,102,107
Penelec	\$28,309,271	\$29,512,307	\$29,622,969	\$28,398,146	\$25,667,121	\$25,297,837	\$25,289,369	\$25,006,110	\$24,639,601	\$23,881,442	\$25,210,555	\$27,956,303	\$30,243,922	\$31,935,209	\$31,185,112
Penn Power	\$7,803,386	\$8,017,949	\$7,902,200	\$7,864,617	\$7,030,464	\$6,747,286	\$6,579,003	\$6,394,928	\$6,231,615	\$5,994,190	\$6,244,671	\$6,957,564	\$7,440,743	\$7,784,451	\$7,848,479
West Penn Power	\$27,279,463	\$28,603,904	\$29,144,926	\$27,920,912	\$25,483,080	\$25,060,066	\$24,195,744	\$23,971,087	\$23,418,353	\$22,615,358	\$23,663,092	\$26,221,244	\$28,311,587	\$29,919,034	\$29,501,728
All FirstEnergy PA	\$86,942,769	\$90,854,618	\$91,754,366	\$87,675,872	\$80,106,423	\$79,135,848	\$77,705,837	\$76,614,305	\$75,384,112	\$72,646,996	\$76,564,843	\$84,794,564	\$91,418,448	\$96,859,464	\$95,637,426
Company	Average												Average		
Met-Ed	\$777	\$822	\$854	\$804	\$761	\$745	\$745	\$729	\$709	\$693	\$708	\$744	\$799	\$862	\$900
Penelec	\$792	\$846	\$877	\$833	\$780	\$750	\$755	\$749	\$732	\$727	\$739	\$770	\$827	\$889	\$907
Penn Power	\$932	\$976	\$1,003	\$985	\$912	\$863	\$852	\$837	\$789	\$793	\$795	\$832	\$882	\$952	\$991
West Penn Power	\$828	\$876	\$917	\$878	\$822	\$789	\$789	\$762	\$736	\$726	\$735	\$766	\$822	\$881	\$905
All FirstEnergy PA	\$810	\$858	\$892	\$851	\$797	\$769	\$770	\$754	\$732	\$722	\$733	\$766	\$822	\$884	\$911

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

Question 23d Confirmed low income FE PA customers, excluding PCAP customers

Note 1: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "confirmed low income" in alignment with PA regulatory income levels. As such, the confirmed low-income arrears data sets include accounts that were determined to be confirmed low income during the month/year for which data was provided.

Note 2: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "PCAP" in alignment with PA regulatory income levels. As such, the PCAP arrears data sets include accounts that were determined to be PCAP during the month/year for which data was provided.

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$18,270,063	\$19,509,913	\$19,231,865	\$16,330,886	\$15,895,209	\$15,825,366	\$15,143,803	\$15,048,391	\$14,681,253	\$14,412,249	\$14,808,751	\$16,240,074	\$18,151,026	\$19,108,784	\$24,867,419	\$20,773,859	\$21,583,763	\$21,460,339	\$21,930,662	\$22,760,158	\$23,126,416	\$19,679,953	\$21,922,545	\$23,668,912
Penelac	\$22,776,261	\$24,133,540	\$23,508,718	\$20,632,008	\$19,377,297	\$19,418,962	\$18,397,740	\$18,010,703	\$17,543,957	\$17,237,974	\$17,750,177	\$19,648,807	\$22,203,076	\$23,351,609	\$30,701,450	\$24,479,891	\$25,117,428	\$25,143,577	\$26,100,920	\$27,335,975	\$28,060,871	\$23,906,253	\$27,762,700	\$29,624,838
Penn Power	\$5,603,854	\$5,966,254	\$5,761,575	\$5,072,414	\$4,845,095	\$4,786,177	\$4,530,578	\$4,543,692	\$4,305,499	\$4,223,054	\$4,384,102	\$4,887,033	\$5,525,902	\$5,762,028	\$7,280,517	\$6,050,934	\$6,103,643	\$6,052,090	\$6,202,274	\$6,449,135	\$6,540,532	\$6,458,931	\$6,560,105	\$6,919,156
West Penn Power	\$23,586,647	\$25,180,865	\$25,006,842	\$22,118,412	\$20,728,443	\$20,532,993	\$19,618,288	\$19,119,441	\$18,602,436	\$18,259,075	\$19,108,299	\$21,121,823	\$23,723,462	\$24,725,552	\$30,249,456	\$26,535,901	\$26,873,900	\$26,648,649	\$27,209,741	\$28,057,636	\$28,592,396	\$24,861,446	\$27,424,576	\$29,187,281
All FirstEnergy PA	\$70,236,824	\$74,790,573	\$73,509,000	\$64,153,721	\$60,846,014	\$60,563,497	\$57,690,410	\$56,722,227	\$55,133,144	\$54,132,351	\$56,051,328	\$61,897,737	\$69,603,467	\$72,947,972	\$93,098,842	\$77,840,585	\$79,678,734	\$79,304,655	\$81,443,597	\$84,602,905	\$86,320,215	\$74,906,583	\$83,669,935	\$89,400,187
Company	Average												Average											
Met-Ed	\$658	\$715	\$737	\$653	\$638	\$631	\$616	\$601	\$580	\$568	\$573	\$599	\$651	\$703	\$1,323	\$773	\$837	\$874	\$618	\$958	\$977	\$1,136	\$1,122	\$1,145
Penelac	\$655	\$717	\$738	\$672	\$636	\$628	\$613	\$592	\$581	\$568	\$572	\$597	\$651	\$714	\$1,346	\$787	\$849	\$884	\$627	\$958	\$987	\$1,160	\$1,147	\$1,164
Penn Power	\$731	\$795	\$814	\$737	\$702	\$691	\$677	\$663	\$629	\$615	\$628	\$659	\$730	\$787	\$1,375	\$862	\$923	\$952	\$750	\$1,031	\$1,042	\$1,273	\$1,193	\$1,200
West Penn Power	\$778	\$845	\$879	\$804	\$760	\$749	\$733	\$704	\$681	\$664	\$673	\$705	\$766	\$830	\$1,428	\$906	\$967	\$1,003	\$768	\$1,074	\$1,100	\$1,304	\$1,250	\$1,258
All FirstEnergy PA	\$699	\$761	\$786	\$712	\$680	\$670	\$655	\$634	\$615	\$601	\$608	\$635	\$692	\$752	\$1,367	\$826	\$887	\$923	\$674	\$999	\$1,023	\$1,207	\$1,175	\$1,191

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$25,304,014	\$25,730,512	\$24,867,419	\$23,451,286	\$22,086,560	\$21,575,772	\$21,541,923	\$20,630,976	\$20,579,262	\$19,679,953	\$16,370,924	\$17,760,304	\$20,561,501	\$21,152,975	\$20,976,254	\$18,574,011	\$17,222,228	\$16,022,366	\$15,395,614	\$14,045,705	\$13,896,232	\$13,454,556	\$13,578,541	\$15,327,965
Penelac	\$31,309,918	\$32,051,275	\$30,701,450	\$28,831,065	\$27,219,427	\$26,514,586	\$26,419,727	\$25,504,243	\$25,105,682	\$23,906,253	\$20,361,309	\$22,159,347	\$25,397,934	\$26,046,362	\$25,908,228	\$23,757,132	\$22,072,863	\$20,595,793	\$19,843,590	\$18,294,709	\$17,680,701	\$16,950,728	\$17,029,469	\$19,135,236
Penn Power	\$7,347,445	\$7,510,116	\$7,280,517	\$6,972,830	\$6,805,759	\$6,690,380	\$6,607,365	\$6,510,646	\$6,625,402	\$6,458,931	\$5,408,078	\$5,893,782	\$6,752,640	\$6,967,173	\$6,968,015	\$6,419,119	\$6,046,645	\$5,595,309	\$5,328,418	\$4,951,795	\$4,914,457	\$4,818,285	\$4,884,384	\$5,469,335
West Penn Power	\$30,679,090	\$31,444,704	\$30,249,456	\$28,395,044	\$27,454,947	\$26,944,005	\$26,637,180	\$25,954,512	\$25,891,624	\$24,861,446	\$21,152,989	\$22,642,873	\$25,657,062	\$26,515,580	\$26,459,300	\$23,823,687	\$21,864,784	\$20,130,167	\$18,959,135	\$17,182,881	\$16,990,449	\$16,145,064	\$16,302,288	\$18,164,531
All FirstEnergy PA	\$94,640,466	\$96,736,688	\$93,098,842	\$87,550,225	\$83,566,693	\$81,724,743	\$81,206,195	\$78,600,378	\$78,201,970	\$74,906,583	\$63,293,300	\$68,455,306	\$78,369,137	\$80,682,090	\$80,311,797	\$72,573,948	\$67,206,520	\$62,343,635	\$59,526,757	\$54,475,090	\$53,481,838	\$51,368,633	\$51,794,682	\$58,007,067
Company	Average												Average											
Met-Ed	\$1,214	\$1,265	\$1,323	\$1,369	\$1,281	\$1,282	\$1,283	\$1,240	\$1,188	\$1,136	\$1,180	\$1,166	\$1,133	\$1,173	\$1,174	\$1,058	\$990	\$932	\$871	\$828	\$786	\$764	\$742	\$771
Penelac	\$1,234	\$1,292	\$1,346	\$1,394	\$1,309	\$1,307	\$1,299	\$1,259	\$1,210	\$1,160	\$1,181	\$1,168	\$1,136	\$1,188	\$1,211	\$1,132	\$1,061	\$1,009	\$953	\$925	\$862	\$835	\$810	\$819
Penn Power	\$1,264	\$1,320	\$1,375	\$1,425	\$1,380	\$1,362	\$1,345	\$1,351	\$1,314	\$1,273	\$1,283	\$1,264	\$1,270	\$1,325	\$1,338	\$1,257	\$1,190	\$1,135	\$1,075	\$1,051	\$998	\$980	\$971	\$1,001
West Penn Power	\$1,325	\$1,380	\$1,428	\$1,487	\$1,413	\$1,411	\$1,408	\$1,385	\$1,345	\$1,304	\$1,362	\$1,331	\$1,291	\$1,345	\$1,361	\$1,265	\$1,169	\$1,095	\$1,023	\$977	\$920	\$882	\$855	\$863
All FirstEnergy PA	\$1,259	\$1,314	\$1,367	\$1,418	\$1,339	\$1,337	\$1,332	\$1,300	\$1,254	\$1,207	\$1,244	\$1,225	\$1,193	\$1,243	\$1,257	\$1,162	\$1,084	\$1,024	\$960	\$922	\$868	\$840	\$817	\$833

Company	2023												2024		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Met-Ed	\$16,841,571	\$18,066,254	\$18,446,005	\$17,428,550	\$15,970,488	\$15,767,484	\$15,411,315	\$14,807,121	\$14,575,655	\$13,804,862	\$14,740,005	\$16,612,221	\$18,145,215	\$20,000,387	\$20,777,265
Penelac	\$21,113,095	\$22,296,771	\$22,509,608	\$21,518,878	\$19,275,323	\$18,574,706	\$18,373,016	\$17,981,341	\$17,437,205	\$16,864,409	\$17,951,551	\$20,175,136	\$22,153,502	\$24,009,424	\$24,657,158
Penn Power	\$5,885,221	\$6,124,927	\$6,056,594	\$6,037,061	\$5,348,852	\$5,042,517	\$4,806,964	\$4,598,364	\$4,459,462	\$4,300,913	\$4,563,159	\$5,172,422	\$5,681,420	\$6,117,819	\$6,262,032
West Penn Power	\$19,749,847	\$21,076,788	\$21,730,782	\$20,783,580	\$18,786,231	\$18,178,352	\$17,298,613	\$16,936,135	\$16,368,962	\$15,665,337	\$16,470,926	\$18,754,002	\$20,584,409	\$22,331,372	\$23,186,958
All FirstEnergy PA	\$63,589,734	\$67,564,740	\$68,742,990	\$65,768,069	\$59,380,894	\$57,563,059	\$55,889,908	\$54,322,961	\$52,841,284	\$50,635,522	\$53,725,641	\$60,713,781	\$66,564,545	\$72,459,601	\$75,083,414
Company	Average												Average		
Met-Ed	\$832	\$887	\$927	\$879	\$833	\$813	\$818	\$791	\$765	\$737	\$749	\$789	\$845	\$913	\$943
Penelac	\$874	\$943	\$983	\$937	\$882	\$844	\$853	\$843	\$813	\$805	\$811	\$840	\$897	\$962	\$969
Penn Power	\$1,067	\$1,111	\$1,145	\$1,133	\$1,064	\$1,000	\$982	\$963	\$911	\$876	\$848	\$895	\$960	\$1,015	\$1,054
West Penn Power	\$913	\$974	\$1,029	\$986	\$931	\$894	\$897	\$860	\$825	\$800	\$804	\$838	\$895	\$956	\$967
All FirstEnergy PA	\$889	\$949	\$993	\$950	\$897	\$862	\$866	\$842	\$810	\$789	\$794	\$829	\$887	\$950	\$967

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

Question 23e FE PA PCAP customers

Note 1: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "PCAP" in alignment with PA regulatory income levels. As such, the PCAP arrears data sets include accounts that were determined to be PCAP during the month/year for which data was provided.

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$4,418,810	\$4,375,769	\$4,162,545	\$3,837,780	\$3,639,092	\$3,739,158	\$3,760,021	\$3,663,804	\$3,568,566	\$3,464,917	\$3,344,675	\$3,372,219	\$3,566,312	\$3,533,693	\$8,457,088	\$3,743,559	\$4,162,785	\$4,820,035	\$5,376,848	\$5,871,074	\$6,128,447	\$5,580,058	\$7,374,808	\$7,842,680
Penelac	\$4,784,185	\$4,696,809	\$4,454,022	\$4,029,191	\$3,769,645	\$3,869,410	\$3,877,742	\$3,851,382	\$3,791,659	\$3,790,474	\$3,711,134	\$3,770,268	\$3,978,899	\$4,050,486	\$8,659,104	\$4,119,181	\$4,399,873	\$5,060,851	\$5,401,283	\$5,891,615	\$6,158,079	\$5,919,155	\$7,451,425	\$8,061,018
Penn Power	\$1,143,475	\$1,123,102	\$1,044,716	\$944,937	\$858,850	\$866,426	\$889,718	\$845,437	\$822,694	\$798,744	\$805,939	\$839,617	\$882,304	\$885,974	\$2,071,731	\$896,034	\$980,122	\$1,207,303	\$1,321,744	\$1,415,497	\$1,540,585	\$1,470,442	\$1,821,917	\$1,933,884
West Penn Power	\$6,331,067	\$6,155,456	\$5,869,294	\$5,336,754	\$4,954,491	\$4,877,404	\$4,859,430	\$4,700,612	\$4,482,036	\$4,348,557	\$4,321,128	\$4,489,467	\$4,707,329	\$4,714,391	\$9,668,168	\$4,777,151	\$5,101,849	\$5,850,285	\$6,378,724	\$6,910,769	\$7,236,039	\$6,551,173	\$8,523,518	\$9,082,156
All FirstEnergy PA	\$16,677,536	\$16,351,136	\$15,530,577	\$14,148,662	\$13,222,077	\$13,352,399	\$13,386,911	\$13,061,235	\$12,664,954	\$12,402,691	\$12,182,877	\$12,471,571	\$13,134,845	\$13,184,544	\$28,856,091	\$13,535,925	\$14,644,629	\$16,938,474	\$18,568,600	\$20,088,954	\$21,063,151	\$19,520,828	\$25,171,667	\$26,919,738
Company	Average												Average											
Met-Ed	\$589	\$603	\$581	\$546	\$554	\$573	\$578	\$563	\$561	\$563	\$556	\$565	\$568	\$560	\$792	\$552	\$573	\$601	\$579	\$657	\$662	\$575	\$735	\$755
Penelac	\$546	\$554	\$538	\$501	\$505	\$516	\$514	\$517	\$523	\$546	\$549	\$565	\$567	\$569	\$747	\$553	\$555	\$591	\$562	\$622	\$632	\$546	\$697	\$716
Penn Power	\$584	\$588	\$572	\$522	\$509	\$525	\$534	\$522	\$531	\$544	\$557	\$568	\$580	\$579	\$801	\$567	\$594	\$654	\$635	\$685	\$715	\$606	\$751	\$771
West Penn Power	\$551	\$558	\$541	\$504	\$488	\$492	\$496	\$501	\$507	\$530	\$541	\$560	\$562	\$565	\$763	\$551	\$564	\$595	\$572	\$636	\$650	\$586	\$720	\$743
All FirstEnergy PA	\$561	\$570	\$552	\$515	\$511	\$522	\$525	\$523	\$528	\$545	\$549	\$563	\$566	\$566	\$769	\$553	\$566	\$599	\$575	\$641	\$653	\$572	\$719	\$740

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Met-Ed	\$8,383,996	\$8,493,267	\$8,457,088	\$7,835,243	\$6,479,528	\$5,835,703	\$5,599,792	\$5,398,310	\$5,475,902	\$5,580,058	\$5,802,240	\$6,334,390	\$6,766,354	\$6,969,442	\$7,029,340	\$6,660,079	\$6,215,403	\$6,224,299	\$6,477,220	\$6,191,596	\$6,336,571	\$6,260,101	\$6,189,241	\$6,530,350
Penelac	\$8,509,129	\$8,768,841	\$8,659,104	\$8,095,836	\$6,953,338	\$6,255,322	\$5,935,495	\$5,749,063	\$5,794,485	\$5,919,155	\$6,107,134	\$6,638,668	\$6,987,491	\$7,193,455	\$7,212,442	\$6,885,139	\$6,348,576	\$6,563,236	\$6,749,706	\$6,326,413	\$6,492,681	\$6,487,860	\$6,404,865	\$6,880,730
Penn Power	\$2,039,050	\$2,108,097	\$2,071,731	\$1,988,730	\$1,740,225	\$1,640,757	\$1,507,532	\$1,411,379	\$1,424,327	\$1,470,442	\$1,595,245	\$1,712,008	\$1,814,068	\$1,860,029	\$1,858,215	\$1,764,556	\$1,698,910	\$1,705,458	\$1,767,490	\$1,709,578	\$1,769,983	\$1,737,384	\$1,754,322	\$1,853,612
West Penn Power	\$9,528,742	\$9,706,142	\$9,668,168	\$9,134,206	\$7,688,674	\$7,063,947	\$6,705,033	\$6,442,679	\$6,427,077	\$6,551,173	\$6,843,709	\$7,403,882	\$7,775,947	\$8,011,199	\$7,923,164	\$7,465,764	\$7,025,693	\$7,057,246	\$7,180,300	\$6,815,707	\$6,973,361	\$6,931,995	\$6,830,387	\$7,251,057
All FirstEnergy PA	\$28,360,917	\$29,076,347	\$28,856,091	\$27,054,014	\$22,861,766	\$20,795,729	\$19,747,853	\$19,001,431	\$19,121,790	\$19,520,828	\$20,348,328	\$22,088,948	\$23,343,860	\$24,034,125	\$24,023,160	\$22,775,538	\$21,298,581	\$21,550,238	\$22,174,715	\$21,043,294	\$21,572,596	\$21,417,339	\$21,178,815	\$22,515,750
Company	Average												Average											
Met-Ed	\$782	\$789	\$792	\$741	\$629	\$580	\$557	\$546	\$565	\$575	\$588	\$618	\$640	\$660	\$676	\$636	\$599	\$596	\$597	\$605	\$609	\$605	\$618	\$643
Penelac	\$734	\$749	\$747	\$705	\$615	\$560	\$533	\$523	\$536	\$546	\$555	\$579	\$593	\$606	\$623	\$593	\$550	\$561	\$553	\$564	\$563	\$560	\$573	\$597
Penn Power	\$789	\$802	\$801	\$773	\$681	\$650	\$603	\$573	\$585	\$606	\$649	\$661	\$680	\$701	\$710	\$678	\$654	\$648	\$636	\$673	\$669	\$656	\$648	\$651
West Penn Power	\$757	\$763	\$763	\$731	\$637	\$594	\$566	\$555	\$571	\$586	\$610	\$632	\$654	\$676	\$687	\$648	\$615	\$611	\$606	\$627	\$625	\$618	\$620	\$642
All FirstEnergy PA	\$759	\$769	\$769	\$729	\$631	\$583	\$556	\$544	\$559	\$572	\$589	\$613	\$632	\$651	\$665	\$629	\$592	\$593	\$588	\$603	\$603	\$598	\$606	\$629

Company	2023												2024		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Met-Ed	\$6,743,143	\$6,689,990	\$6,677,900	\$6,231,282	\$5,959,184	\$6,265,846	\$6,233,724	\$6,437,505	\$6,527,837	\$6,364,024	\$6,723,223	\$7,064,377	\$7,286,576	\$7,231,270	\$6,136,670
Penelac	\$7,002,982	\$7,222,643	\$7,121,661	\$6,786,524	\$6,393,928	\$6,725,792	\$6,919,514	\$7,030,015	\$7,206,743	\$7,000,254	\$7,263,816	\$7,786,968	\$8,094,703	\$7,930,223	\$6,534,646
Penn Power	\$1,920,930	\$1,897,420	\$1,849,479	\$1,830,035	\$1,681,612	\$1,704,771	\$1,774,413	\$1,796,780	\$1,772,156	\$1,693,279	\$1,681,512	\$1,785,142	\$1,759,594	\$1,666,902	\$1,586,780
West Penn Power	\$7,539,533	\$7,534,215	\$7,420,091	\$7,141,908	\$6,698,925	\$6,888,006	\$6,903,530	\$7,051,436	\$7,055,871	\$6,967,499	\$7,209,486	\$7,485,326	\$7,744,502	\$7,605,641	\$6,332,981
All FirstEnergy PA	\$23,406,588	\$23,344,268	\$23,069,131	\$21,989,749	\$20,733,649	\$21,584,415	\$21,831,181	\$22,315,735	\$22,562,606	\$22,045,057	\$22,878,037	\$24,121,213	\$24,885,375	\$24,434,036	\$20,591,077
Company	Average												Average		
Met-Ed	\$669	\$688	\$702	\$654	\$617	\$616	\$611	\$618	\$610	\$614	\$632	\$657	\$704	\$746	\$779
Penelac	\$623	\$642	\$655	\$617	\$578	\$574	\$578	\$582	\$588	\$590	\$606	\$633	\$681	\$723	\$731
Penn Power	\$672	\$701	\$714	\$689	\$615	\$629	\$627	\$610	\$640	\$679	\$690	\$690	\$725	\$777	\$802
West Penn Power	\$666	\$684	\$695	\$666	\$618	\$603	\$605	\$599	\$589	\$601	\$616	\$630	\$675	\$718	\$734
All FirstEnergy PA	\$653	\$673	\$686	\$648	\$606	\$598	\$600	\$601	\$597	\$604	\$622	\$643	\$689	\$732	\$751

CAUSE Set 1 From 2019 to present, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following FE PA customer segments:

Question 23f FE PA PCAP customers entering PCAP that month

Note 1: FE PA stores arrears data alongside of historically time-sliced indicators that can be used to disaggregate data as "PCAP" in alignment with PA regulatory income levels. As such, the PCAP arrears data sets include accounts that were determined to be PCAP during the month/year for which data was provided.

Company	2019												2020											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Company	Total												Total											
Met-Ed	\$2,780	\$590	\$5,395	\$8,671	\$20,212	\$4,963	\$2,100	\$7,630	\$6,404	\$3,430	\$3,138	\$2,263	\$12,696	\$1,861	\$220,862	\$1,758	\$110,545	\$113,870	\$152,601	\$92,592	\$67,939	\$214,008	\$54,946	\$55,249
Penelec	\$2,520	\$3,797	\$4,230	\$9,715	\$12,791	\$6,422	\$3,157	\$3,946	\$4,854	\$5,620	\$5,896	\$2,111	\$2,057	\$7,007	\$187,072	\$7,497	\$68,880	\$204,408	\$100,557	\$91,187	\$79,674	\$216,584	\$106,768	\$64,135
Penn Power	\$748	\$332	\$964	\$1,065	\$1,929	\$58	\$276	\$1,131	\$2,409	\$1,378	\$1,999	\$92	\$1,013	\$0	\$45,396	\$0	\$14,457	\$41,353	\$20,407	\$15,800	\$35,958	\$44,377	\$24,540	\$22,481
West Penn Power	\$3,108	\$2,602	\$3,500	\$5,235	\$4,388	\$4,421	\$3,075	\$3,871	\$6,345	\$7,706	\$2,835	\$1,269	\$5,496	\$1,468	\$319,933	\$2,897	\$112,154	\$205,719	\$131,203	\$122,901	\$74,434	\$254,463	\$122,885	\$55,718
All FirstEnergy PA	\$9,156	\$7,321	\$14,089	\$24,687	\$39,320	\$15,864	\$8,608	\$16,578	\$20,012	\$18,134	\$13,868	\$5,735	\$21,262	\$10,336	\$773,263	\$12,152	\$306,036	\$565,351	\$404,768	\$322,479	\$258,006	\$729,433	\$309,139	\$197,583
Company	Average												Average											
Met-Ed	\$82	\$45	\$125	\$142	\$348	\$142	\$64	\$182	\$194	\$132	\$105	\$103	\$363	\$62	\$673	\$73	\$709	\$759	\$649	\$985	\$829	\$619	\$678	\$674
Penelec	\$101	\$122	\$108	\$183	\$272	\$146	\$93	\$90	\$135	\$255	\$164	\$141	\$82	\$219	\$594	\$227	\$499	\$1,093	\$521	\$960	\$984	\$521	\$809	\$697
Penn Power	\$187	\$166	\$482	\$213	\$241	\$19	\$92	\$188	\$301	\$197	\$286	\$46	\$1,013	n/a	\$639	n/a	\$803	\$1,088	\$680	\$1,436	\$2,997	\$562	\$1,292	\$1,022
West Penn Power	\$259	\$260	\$184	\$291	\$209	\$177	\$220	\$215	\$276	\$321	\$167	\$181	\$500	\$147	\$782	\$207	\$904	\$1,088	\$721	\$1,756	\$1,181	\$625	\$1,217	\$1,114
All FirstEnergy PA	\$122	\$131	\$137	\$180	\$293	\$148	\$102	\$151	\$200	\$230	\$154	\$125	\$295	\$144	\$689	\$171	\$702	\$1,002	\$632	\$1,194	\$1,084	\$584	\$928	\$803

Company	2021												2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Company	Total												Total											
Met-Ed	\$33,122	\$73,557	\$68,962	\$171,585	\$120,877	\$86,625	\$40,195	\$54,238	\$68,226	\$72,644	\$63,342	\$42,284	\$24,425	\$49,747	\$80,578	\$24,965	\$8,646	\$52,047	\$38,998	\$17,935	\$10,894	\$23,755	\$21,292	\$17,213
Penelec	\$58,982	\$55,931	\$71,315	\$153,730	\$147,889	\$79,212	\$77,282	\$50,753	\$40,831	\$133,809	\$92,321	\$51,735	\$27,490	\$42,025	\$65,761	\$70,146	\$11,942	\$61,125	\$104,614	\$41,754	\$17,768	\$42,415	\$12,209	\$29,199
Penn Power	\$22,204	\$18,671	\$53,425	\$37,338	\$19,348	\$32,997	\$24,597	\$10,413	\$9,559	\$9,672	\$36,241	\$19,696	\$3,866	\$6,648	\$9,626	\$40,441	\$2,132	\$28,447	\$1,485	\$3,153	\$3,540	\$3,030	\$294	\$795
West Penn Power	\$57,673	\$43,702	\$75,762	\$268,970	\$117,436	\$68,816	\$51,404	\$51,034	\$76,964	\$96,611	\$82,162	\$47,218	\$43,585	\$33,283	\$61,523	\$66,562	\$11,506	\$72,149	\$35,429	\$45,737	\$12,201	\$11,969	\$4,295	\$11,538
All FirstEnergy PA	\$171,982	\$191,862	\$269,464	\$631,623	\$405,549	\$267,650	\$193,478	\$166,439	\$195,581	\$312,736	\$274,067	\$160,933	\$99,365	\$131,703	\$217,489	\$202,114	\$34,226	\$213,769	\$180,526	\$108,579	\$44,403	\$81,169	\$38,090	\$58,745
Company	Average												Average											
Met-Ed	\$487	\$968	\$1,231	\$1,806	\$1,679	\$1,312	\$693	\$1,550	\$1,118	\$757	\$1,152	\$919	\$582	\$816	\$1,300	\$567	\$865	\$839	\$582	\$417	\$908	\$720	\$710	\$465
Penelec	\$621	\$811	\$951	\$1,106	\$1,479	\$1,085	\$954	\$1,057	\$869	\$1,274	\$1,112	\$750	\$561	\$539	\$1,196	\$1,096	\$919	\$784	\$1,308	\$733	\$935	\$884	\$531	\$730
Penn Power	\$1,388	\$1,436	\$2,323	\$1,623	\$1,018	\$2,538	\$1,640	\$947	\$1,195	\$691	\$2,265	\$1,515	\$773	\$1,108	\$963	\$4,044	\$1,066	\$2,371	\$1,655	\$450	\$885	\$606	\$294	\$132
West Penn Power	\$1,131	\$1,249	\$1,684	\$1,921	\$1,702	\$1,298	\$1,254	\$1,309	\$2,138	\$1,534	\$1,748	\$1,312	\$1,406	\$1,148	\$1,309	\$1,305	\$1,918	\$1,443	\$805	\$1,116	\$678	\$630	\$268	\$607
All FirstEnergy PA	\$748	\$994	\$1,354	\$1,591	\$1,560	\$1,306	\$992	\$1,251	\$1,287	\$1,125	\$1,364	\$981	\$782	\$757	\$1,250	\$1,196	\$1,104	\$1,058	\$903	\$734	\$838	\$773	\$544	\$576

Company	2023												2024		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Company	Total												Total		
Met-Ed	\$8,228	\$103	\$51,276	\$55,692	\$44,519	\$32,572	\$32,944	\$26,006	\$48,950	\$24,796	\$5,060	\$12,853	\$8,729	\$19,539	\$13,498
Penelec	\$10,634	\$27	\$78,499	\$51,302	\$24,318	\$28,002	\$34,229	\$41,338	\$32,138	\$23,492	\$8,870	\$9,578	\$12,507	\$9,893	\$20,468
Penn Power	\$1,437	\$0	\$14,451	\$10,347	\$1,959	\$2,813	\$6,493	\$21,353	\$1,286	\$4,178	\$4,737	\$3,405	\$1,149	\$6,814	\$2,472
West Penn Power	\$7,228	\$0	\$38,283	\$62,404	\$36,944	\$54,436	\$46,082	\$53,602	\$30,694	\$33,890	\$10,299	\$2,967	\$1,815	\$9,030	\$12,992
All FirstEnergy PA	\$27,527	\$130	\$182,508	\$179,745	\$107,739	\$117,823	\$119,748	\$142,298	\$113,067	\$86,356	\$28,966	\$28,803	\$24,200	\$45,275	\$49,431
Company	Average												Average		
Met-Ed	\$235	\$34	\$410	\$671	\$718	\$665	\$531	\$531	\$661	\$954	\$389	\$476	\$301	\$630	\$287
Penelec	\$354	\$27	\$801	\$744	\$593	\$394	\$658	\$811	\$714	\$412	\$806	\$416	\$481	\$396	\$455
Penn Power	\$718	n/a	\$1,112	\$1,478	\$326	\$703	\$928	\$1,124	\$429	\$696	\$592	\$851	\$287	\$973	\$275
West Penn Power	\$344	n/a	\$617	\$1,058	\$1,154	\$1,328	\$1,355	\$1,411	\$808	\$1,303	\$858	\$371	\$227	\$393	\$464
All FirstEnergy PA	\$313	\$32	\$612	\$825	\$764	\$714	\$773	\$906	\$707	\$751	\$658	\$465	\$361	\$526	\$383

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 1**

“From 2019 to present, disaggregated by month and year (as of the last day of the month/year), and Rate District, please provide the following information:

- a. How many FE PA customers applied for a FE PA Hardship Fund grant?
- b. How many FE PA customers received a FE PA Hardship Fund grant?
- c. How many FE PA Hardship Fund grants were approved?
- d. How many confirmed low income customers applied for a FE PA Hardship Fund grant?
- e. How many confirmed low income customers received a FE PA Hardship Fund grant?
- f. How many FE PA CAP (PCAP) customers applied for a FE PA Hardship Fund grant?
- g. How many PCAP customers received a FE PA Hardship Fund grant?

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

- a. - c. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 1, Attachment A.
- d. The Company does not maintain reports detailing all customers that applied for a hardship fund grant.
- e. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 1, Attachment B for a list of hardship fund grants that were received, disaggregated by month and year, for customers that are known to be confirmed low income currently.
- f. The Company does not maintain reports detailing all customers that applied for a hardship fund grant.
- g. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 1, Attachment C for a list of hardship fund grants that were received, disaggregated by month and year, for customers that are known to be enrolled on PCAP currently.

**CAUSE-PA SET II No. 1 a**

<b>Met-Ed</b>																				
<b>PA Customers Applied for Grant</b>							<b>PA Customers Received Grant</b>						<b>Number of Grants Approved</b>							
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024	c.	2019	2020	2021	2022	2023	2024
Jan	11	6	13	2	5	10	9	6	11	1	3	0	9	6	11	1	3	0		
Feb	7	8	10	10	2	11	6	4	10	7	0	1	6	4	10	7	0	1		
Mar	75	64	11	106	147	151	67	56	9	82	109	81	67	56	9	82	109	81		
Apr	237	119	69	163	347		202	105	56	133	276		202	105	56	133	276			
May	153	177	219	177	134		114	162	195	139	81		114	162	195	139	81			
Jun	37	140	131	231	41		25	113	120	195	32		25	113	120	195	32			
Jul	0	124	98	292	0		0	109	96	270	0		0	109	96	270	0			
Aug	0	108	83	156	0		0	90	78	135	0		0	90	78	135	0			
Sep	0	179	84	45	1		0	160	80	33	0		0	160	80	33	0			
Oct	131	96	89	156	21		100	85	78	140	12		100	85	78	140	12			
Nov	65	19	55	98	65		40	13	42	65	22		40	13	42	65	22			
Dec	8	8	3	5	11		8	6	1	4	4		8	6	1	4	4			

<b>Penelec</b>																				
<b>PA Customers Applied for Grant</b>							<b>PA Customers Received Grant</b>						<b>Number of Grants Approved</b>							
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024	c.	2019	2020	2021	2022	2023	2024
Jan	12	11	9	3	1	6	11	11	7	2	1	0	11	11	7	2	1	0		
Feb	4	18	11	10	2	19	2	15	11	7	1	3	2	15	11	7	1	3		
Mar	114	61	15	109	136	130	94	53	12	88	103	58	94	53	12	88	103	58		
Apr	117	100	97	175	259		80	87	78	129	166		80	87	78	129	166			
May	0	130	175	121	1		0	121	155	94	0		0	121	155	94	0			
Jun	0	150	37	10	2		0	121	30	3	0		0	121	30	3	0			
Jul	0	103	12	2	0		0	83	0	0	0		0	83	0	0	0			
Aug	0	128	0	0	0		0	110	0	0	0		0	110	0	0	0			
Sep	0	80	1	0	0		0	70	0	0	0		0	70	0	0	0			
Oct	165	93	67	138	36		117	83	56	122	19		117	83	56	122	19			
Nov	79	15	48	84	61		58	7	36	52	17		58	7	36	52	17			
Dec	7	14	6	7	11		5	11	3	6	3		5	11	3	6	3			

<b>Penn Power</b>																				
<b>PA Customers Applied for Grant</b>							<b>PA Customers Received Grant</b>						<b>Number of Grants Approved</b>							
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024	c.	2019	2020	2021	2022	2023	2024
Jan	1	1	0	2	0	2	1	1	0	1	0	0	1	1	0	1	0	0		
Feb	4	2	1	2	1	3	4	1	0	2	0	1	4	1	0	2	0	1		
Mar	54	31	6	27	46	42	43	27	6	21	32	25	43	27	6	21	32	25		
Apr	112	31	30	63	113		74	21	26	46	92		74	21	26	46	92			
May	12	40	60	52	48		6	38	51	40	33		6	38	51	40	33			
Jun	9	21	35	49	4		2	16	33	41	1		2	16	33	41	1			
Jul	13	38	36	74	5		8	28	31	64	3		8	28	31	64	3			
Aug	5	21	31	98	18		2	19	28	85	5		2	19	28	85	5			
Sep	0	53	20	69	9		0	47	20	52	1		0	47	20	52	1			
Oct	59	15	24	41	15		36	15	21	38	5		36	15	21	38	5			
Nov	27	2	12	25	23		22	1	10	17	13		22	1	10	17	13			
Dec	1	4	2	5	2		1	4	1	5	1		1	4	1	5	1			

<b>West Penn Power</b>																				
<b>PA Customers Applied for Grant</b>							<b>PA Customers Received Grant</b>						<b>Number of Grants Approved</b>							
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024	c.	2019	2020	2021	2022	2023	2024
Jan	16	7	10	4	3	8	13	6	5	4	3	0	13	6	5	4	3	0		
Feb	19	11	9	10	3	16	17	7	5	8	0	11	17	7	5	8	0	11		
Mar	166	104	21	114	228	191	137	91	18	96	165	102	137	91	18	96	165	102		
Apr	99	140	112	235	337		73	121	92	177	247		73	121	92	177	247			
May	37	215	253	206	38		16	187	225	161	20		16	187	225	161	20			
Jun	0	148	147	55	0		0	119	141	40	0		0	119	141	40	0			
Jul	0	118	24	39	1		0	103	20	30	0		0	103	20	30	0			
Aug	0	112	37	12	0		0	99	30	7	0		0	99	30	7	0			
Sep	0	178	18	0	0		0	155	11	0	0		0	155	11	0	0			
Oct	271	67	88	160	773		188	62	69	134	387		188	62	69	134	387			
Nov	107	11	57	72	114		75	7	43	49	46		75	7	43	49	46			
Dec	9	5	3	7	13		8	4	3	5	1		8	4	3	5	1			

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 2**

“For 2019 to present, disaggregated by month and year (as of the last day of the month/year), and Rate District, please indicate how many FE PA customers were denied a FE PA Hardship Fund grant, disaggregated by reason of denial (i.e. over income; failure to provide documents; payment history; etc.).

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set II, No. 002, Attachment A.

Decision Code	Decision Code Name	Customer Notification Message
<b>11 Additional Payment</b>		We are not able to approve your application for assistance. Your utility company requires that you make a payment of \$additionalpayment\$ before we can assist you. If you make the required payment, take a picture of your payment receipt, and email it to granthelp@dollarenergy.org or fax a copy of the receipt to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.
<b>12 Security Deposit</b>		We are not able to approve your application for assistance. Your utility company requires a security deposit of \$securitydeposit\$ before we can assist you. If you make the required payment, take a picture of your payment receipt, and email it to granthelp@dollarenergy.org or fax a copy of the receipt to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.
<b>13 Reconnect Fee</b>		We are not able to approve your application for assistance. Your utility company requires that you pay \$reconnectfee\$ reconnection fee before they will restore your service. If you make the required payment, take a picture of your payment receipt, and email it to granthelp@dollarenergy.org or fax a copy of the receipt to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**14 Sincere Effort of Payment**

We are not able to approve your application for assistance. Your utility company requires that you have made payments that total \$minpayment\$ within the last three months. Your account does not show that this sincere effort of payment has been made. If you make the required payment, take a picture of your payment receipt and email it to granthelp@dollarenergy.org or fax a copy of the receipt to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**Updated 1/3/21:** We are not able to approve your application for assistance. Your utility company requires that you have made payments that total \$minpayment\$ within the last three months. Please note that the timeframe for Lehigh County Authority is four months. If you make the required payment, take a picture of your payment receipt and email it to granthelp@dollarenergy.org or fax a copy of the receipt to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**15 Balance Requirement**

We are not able to approve your application for assistance. Your utility company requires that the balance on your account must be no less than \$minbalance\$ before you are eligible. If your balance reaches that amount and you are still in need of help, take a picture of your utility bill and email it to granthelp@dollarenergy.org or fax a copy of the bill to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**16 Bill Not in Name**

We are not able to approve your application for assistance. The name of the account holder listed on your utility bill was not included on the application. The account holder must be an adult living in your home. If the account holder lives in your household, we will need their name, social security number and proof of their monthly income. Take a picture of proof of their income and email it to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) or fax the proof to 412-431-2084. If the account holder does not live in your household, please contact the utility company to apply for service in your name. If you have the bill changed to your name, take a picture of the proof that the account was changed to your name and email it to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) or fax the proof to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**17 LIHEAP**

We are not able to approve your application for assistance. You are eligible for the Federal LIHEAP Program and have not applied. We cannot assist you until you have applied. After applying for LIHEAP, please contact the agency that completed your application to let them know or email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) to let us know that you have completed an application. If funds are still available and the program is open, we will reconsider your application.

**18 Crisis**

We are not able to approve your application for assistance. You are eligible for the Federal Crisis Program and have not applied or your utility company has not been notified. We cannot assist you until you have applied and your utility company has been notified. After applying for Crisis, please contact the agency that completed your application to let them know or email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) to let us know that you have completed an application. If funds are still available and the program is open, we will reconsider your application.

**19 CAP Customer**

We are not able to approve your application for assistance. Because you are enrolled in the Customer Assistance Program (CAP) or may be eligible for CAP, your utility company has declined a grant from Dollar Energy Fund at this time. Please contact your utility company for more information.

**20 Declined by Utility**

We are not able to approve your application for assistance. Your utility company has declined to accept a grant from Dollar Energy Fund. Please contact your utility company for more information.

**21 Already Granted**

We are not able to approve your application for assistance. You have already received a grant to help with your account for this utility. Please contact your utility company if you are having trouble paying your bill and need assistance.

**22 Requirements Not Met**

We are not able to approve your application for assistance. You have not met all the eligibility requirements. Please contact the utility company for more information.

**23 Not Eligible**

We are not able to approve your application for assistance. Your account does not meet the eligibility requirements to receive a grant from Dollar Energy Fund. If your service is for cooking only, sewage only, a non-heat, commercial or industrial account or a home with a shared utility service you are not eligible for assistance. Utility service must be residential service for a single-family home or apartment.

**24 Not Off/Term**

We are not able to approve your application for assistance. Your utility service must be shut off or you must be in threat of termination to receive assistance at this time. If you receive a termination notice or your service is shut off, take a picture of your termination notice and email it to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) or fax the termination notice to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**25 Not Off**

We are not able to approve your application for assistance. Your utility service must be shut off to receive assistance at this time. If your service does get shut off, email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) to let us know. If funds are still available and the program is open, we will reconsider your application.

**26 Unconfirmed  
Customer**

We are not able to approve your application for assistance. The utility company cannot confirm that you are a customer. If you have a utility bill showing that you have an active residential account, take a picture of the bill and email it to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) or fax a copy of your utility bill to 412-431-2084. If we receive proof that you have an active account, funds are still available, and the program is open, we will reconsider your application. If you have questions about your service, please contact your utility company.

**28 Incomplete  
Application**

We are not able to approve your application for assistance. Your application was incomplete. Please contact the agency where you applied or email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) for more information. If we can complete your application, funds are still available, and the program is open, we will reconsider your application.

**29 Over Income**

We are not able to approve your application for assistance. Your household income is greater than the amount that the utility company allows. Please contact your utility company to see if there are other options to help pay your bill.

**30 RP Not in Household**

We are not able to approve your application for assistance. The utility company records indicate that the rate payer listed on your application does not live in your household. To be eligible for assistance, we require that the person listed on your utility bill is an adult living at the account address. Please contact your utility company for more information.

**31 Already Applied**

We are not able to approve your application for assistance. An application has already been submitted for this utility company in your name.

**32 Incorrect Social Security Number**

We are not able to approve your application for assistance. The social security number that was entered for the account holder does not match the social security number shown on the utility company records. Please contact your utility company for more information.

**37 Closed Account**

We are unable to approve your application for assistance. The account number on your application is for an account that is closed. If you have an active account, please email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) with the correct account number and the first and last name of the person listed on the bill. If you do not have an active account, contact the utility company to set up service. Email [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) with the new account number and the first and last name of the person listed as the account holder. If funds are still available and the program is open, we will reconsider your application.

**38 Wrong Rate Payer**

We are not able to approve your application for assistance. The name of the person listed as the account holder on your application does not match the name on your utility bill. You can send an email to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) with your account number, the name of the person listed on your utility bill and their social security number. If funds are still available and the program is open, we will reconsider your application.

**39 Utility Bill**

We are unable to approve your application for assistance. We require a copy of your most recent utility bill. You can take a picture of the bill and email it to [granthelp@dollarenergy.org](mailto:granthelp@dollarenergy.org) or fax a copy of your utility bill to 412-431-2084. If funds are still available and the program is open, we will reconsider your application.

**98 Program Closed**

We are unable to approve your application for assistance. The program is closed at this time. Please contact your utility company if you are having trouble paying your bill to see if there are other options to assist you with payment.

**99 No Funds**

We are unable to approve your application for assistance. No funds are available for this utility company at this time. Please contact your utility company if you are having trouble paying your bill to see if there are other options to assist you with payment.

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

1/1/2019 - 1/31/2019

Company

MetEd

Code Description	Usage Count
Additional Payment	1
CRISIS	2
LIHEAP	1

Penelec

Code Description	Usage Count
CRISIS	1

West Penn Power

Code Description	Usage Count
Additional Payment	2
CRISIS	1
Sincere Effort of Payment	1

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date  
2/1/2019 - 2/28/2019

Company  
MetEd

Code Description	Usage Count
Additional Payment	1

Penelec

Code Description	Usage Count
Additional Payment	2
Declined by Utility	1

West Penn Power

Code Description	Usage Count
Balance Requirement	1
Declined by Utility	1
LIHEAP	1

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date  
3/1/2019 - 3/31/2019

Company  
MetEd

Code Description	Usage Count
Additional Payment	4
Declined by Utility	1
Incomplete Application	1
LIHEAP	1
Over Income	1
Requirements Not Met	1

Penelec

Code Description	Usage Count
Additional Payment	6
Already Applied	1
Balance Requirement	1
CRISIS	3
Declined by Utility	6
LIHEAP	5
Not Off/Term	3
Requirements Not Met	8

Penn Power

Code Description	Usage Count
Additional Payment	8
Balance Requirement	1
Declined by Utility	7
LIHEAP	1
Requirements Not Met	3

West Penn Power

Code Description	Usage Count
Additional Payment	13
CRISIS	3
Declined by Utility	7
LIHEAP	3
Not Off/Term	2
Over Income	1
Requirements Not Met	7
Sincere Effort of Payment	3

Unconfirmed Customer

1

Witness: M. A. Jones

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4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date  
4/1/2019 - 4/30/2019

Company  
MetEd

Code Description	Usage Count
Additional Payment	19
CRISIS	3
Declined by Utility	7
LIHEAP	3
Requirements Not Met	6
Sincere Effort of Payment	4

Penelec

Code Description	Usage Count
Additional Payment	19
CRISIS	2
Declined by Utility	8
LIHEAP	2
Not Off	3
Requirements Not Met	5
Sincere Effort of Payment	5
Unconfirmed Customer	3

Penn Power

Code Description	Usage Count
Additional Payment	23
CRISIS	2
Declined by Utility	14
LIHEAP	1
Reconnect Fee	1
Requirements Not Met	8
Sincere Effort of Payment	2
Unconfirmed Customer	1

West Penn Power

Code Description	Usage Count
Additional Payment	10
Balance Requirement	2
Declined by Utility	6
Not Off	7
Not Off/Term	2

Requirements Not Met	3
Sincere Effort of Payment	1
Unconfirmed Customer	1

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

5/1/2019 - 5/31/2019

Company

MetEd

Code Description	Usage Count
Additional Payment	20
Not Off/Term	4
Reconnect Fee	2
Requirements Not Met	7
Sincere Effort of Payment	7

Penn Power

Code Description	Usage Count
Additional Payment	3
Not Off	1
Reconnect Fee	1
Requirements Not Met	1

West Penn Power

Code Description	Usage Count
Additional Payment	7
Balance Requirement	1
No Funds	6
Not Off	3
Over Income	1
Requirements Not Met	1
Sincere Effort of Payment	3

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

6/1/2019 - 6/30/2019

MetEd

Code Description	Usage Count
Additional Payment	7
Declined by Utility	1
Not Off	4
Reconnect Fee	3

Penn Power

Code Description	Usage Count
Additional Payment	3
Not Off	3
Sincere Effort of Payment	1

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

7/1/2019 - 7/31/2019

Company

Penn Power

Code Description	Usage Count
Additional Payment	3
Not Off	2

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

8/1/2019 - 8/31/2019

Company

Penn Power

Code Description	Usage Count
Additional Payment	2
No Funds	1

4/22/2024

iPartner 2018 - Pennsylvania  
Denial Code Activity



Date

9/1/2019 - 9/30/2019

Company

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

10/1/2019 - 10/31/2019

Company

MetEd

Code Description	Usage Count
Additional Payment	18
Declined by Utility	3
Not Off/Term	2
Reconnect Fee	2
Sincere Effort of Payment	8

Penelec

Code Description	Usage Count
Additional Payment	29
Already Applied	1
Declined by Utility	1
Not Off/Term	2
Requirements Not Met	1
Sincere Effort of Payment	11
Unconfirmed Customer	3

Penn Power

Code Description	Usage Count
Additional Payment	16
Declined by Utility	2
Reconnect Fee	3
Requirements Not Met	1
Sincere Effort of Payment	5

West Penn Power

Code Description	Usage Count
Additional Payment	41
Already Applied	2
Already Granted	1
Declined by Utility	12
Incomplete Application	1
Not Off/Term	5
Reconnect Fee	2
Requirements Not Met	1
Sincere Effort of Payment	16
Unconfirmed Customer	3

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

11/1/2019 - 11/30/2019

Company

MetEd

Code Description	Usage Count
Additional Payment	6
CRISIS	7
Declined by Utility	3
Incomplete Application	1
LIHEAP	7
Not Off/Term	1
Over Income	2
Requirements Not Met	1
Sincere Effort of Payment	5

Penelec

Code Description	Usage Count
Additional Payment	5
Balance Requirement	1
CRISIS	8
Declined by Utility	1
LIHEAP	7
Not Off/Term	1
Sincere Effort of Payment	6

Penn Power

Code Description	Usage Count
Additional Payment	1
Already Granted	1
Declined by Utility	1
Reconnect Fee	1
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Additional Payment	9
Bill Not In Name	1
CRISIS	4
Declined by Utility	6
Incomplete Application	1
LIHEAP	2

Not Off/Term	3
Requirements Not Met	1
Sincere Effort of Payment	7

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

12/1/2019 - 12/31/2019

Company

Penelec

Code Description	Usage Count
Additional Payment	1
Requirements Not Met	1

West Penn Power

Code Description	Usage Count
Declined by Utility	1

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

01/01/2020 - 01/31/2020

Company

West Penn Power

Code Description

Usage Count

Additional Payment

1

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

02/01/2020 - 02/29/2020

Company

MetEd

Code Description	Usage Count
CRISIS	1
Declined by Utility	1
LIHEAP	1
Not Off/Term	1
Requirements Not Met	1

Penelec

Code Description	Usage Count
CRISIS	2
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
Declined by Utility	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
CRISIS	1
Declined by Utility	1
LIHEAP	1
Sincere Effort of Payment	1

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

03/01/2020 - 03/31/2020

Company

MetEd

Code Description	Usage Count
Additional Payment	4
CRISIS	2
Incomplete Application	1
LIHEAP	1
Not Off/Term	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
Additional Payment	4
Already Applied	1
Declined by Utility	1
Over Income	1
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
Additional Payment	2
Declined by Utility	2

West Penn Power

Code Description	Usage Count
Additional Payment	4
CRISIS	2
Declined by Utility	2
Not Off/Term	2
Sincere Effort of Payment	4

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity

Date

04/01/2020 - 04/30/2020

## Company

## MetEd

Code Description	Usage Count
Additional Payment	3
Declined by Utility	1
Not Off/Term	5
Sincere Effort of Payment	6

## Penelec

Code Description	Usage Count
Additional Payment	3
CRISIS	1
Declined by Utility	1
Not Off/Term	2
Requirements Not Met	1
Sincere Effort of Payment	4
Unconfirmed Customer	1

## Penn Power

Code Description	Usage Count
Additional Payment	3
Incomplete Application	1
Not Off/Term	3
Requirements Not Met	1
Sincere Effort of Payment	2

## West Penn Power

Code Description	Usage Count
Additional Payment	5
CRISIS	1
Declined by Utility	1
LIHEAP	1
Not Off/Term	7
Requirements Not Met	2
Sincere Effort of Payment	5

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

05/01/2020 - 05/31/2020

Company

MetEd

Code Description	Usage Count
Balance Requirement	1
CRISIS	6
Declined by Utility	3
Not Eligible	1
Requirements Not Met	1
Sincere Effort of Payment	4

Penelec

Code Description	Usage Count
Additional Payment	1
Balance Requirement	1
CRISIS	1
Declined by Utility	3
Sincere Effort of Payment	3

Penn Power

Code Description	Usage Count
CRISIS	1
Declined by Utility	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
Already Applied	1
Balance Requirement	4
CRISIS	5
Declined by Utility	8
Incomplete Application	1
Requirements Not Met	5
Sincere Effort of Payment	5
Unconfirmed Customer	1

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

06/01/2020 - 06/30/2020

Company

MetEd

Code Description	Usage Count
Additional Payment	2
Balance Requirement	1
CRISIS	11
Declined by Utility	2
Sincere Effort of Payment	16

Penelec

Code Description	Usage Count
Additional Payment	3
Balance Requirement	2
CRISIS	16
Declined by Utility	4
Incomplete Application	1
Requirements Not Met	2
Sincere Effort of Payment	10

Penn Power

Code Description	Usage Count
Additional Payment	1
CRISIS	3
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	2
Balance Requirement	2
CRISIS	11
Declined by Utility	4
Incomplete Application	2
Requirements Not Met	5
Sincere Effort of Payment	9

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date  
07/01/2020 - 07/31/2020

Company  
MetEd

Code Description	Usage Count
CRISIS	5
Declined by Utility	1
Incorrect Social Security Number	1
Requirements Not Met	3
Sincere Effort of Payment	10

Penelec

Code Description	Usage Count
Already Granted	1
Balance Requirement	2
CRISIS	5
Declined by Utility	5
Incomplete Application	1
Sincere Effort of Payment	9

Penn Power

Code Description	Usage Count
Additional Payment	1
Balance Requirement	1
CRISIS	4
Declined by Utility	2
Requirements Not Met	2
Sincere Effort of Payment	3

West Penn Power

Code Description	Usage Count
CRISIS	6
Declined by Utility	1
Incomplete Application	1
Requirements Not Met	1
Sincere Effort of Payment	6

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

08/01/2020 - 08/31/2020

Rate District

MetEd

Code Description	Usage Count
CRISIS	7
Declined by Utility	3
Requirements Not Met	3
Sincere Effort of Payment	8

Penelec

Code Description	Usage Count
CRISIS	3
Declined by Utility	8
Incomplete Application	1
Over Income	1
Requirements Not Met	1
Sincere Effort of Payment	3
Unconfirmed Customer	1

Penn Power

Code Description	Usage Count
CRISIS	1
Declined by Utility	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
CRISIS	7
Declined by Utility	1
Requirements Not Met	2
Sincere Effort of Payment	3
Unconfirmed Customer	1

4/22/2024

iPartner 2019 - Pennsylvania  
Denial Code Activity



Date

09/01/2020 - 09/30/2020

Company

MetEd

Code Description	Usage Count
Incomplete Application	1
Not Eligible	1
Requirements Not Met	1
Sincere Effort of Payment	17

Penelec

Code Description	Usage Count
Declined by Utility	1
No Funds	1
Not Off/Term	1
Requirements Not Met	4
Sincere Effort of Payment	4

Penn Power

Code Description	Usage Count
Balance Requirement	2
Requirements Not Met	3
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Balance Requirement	1
Declined by Utility	4
Incomplete Application	1
Requirements Not Met	7
Sincere Effort of Payment	10

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

10/01/2020 - 10/31/2020

Company

MetEd

Code Description	Usage Count
Declined by Utility	2
Incomplete Application	2
Requirements Not Met	1
Sincere Effort of Payment	9

Penelec

Code Description	Usage Count
Additional Payment	1
Not Off/Term	3
Requirements Not Met	3
Sincere Effort of Payment	3

West Penn Power

Code Description	Usage Count
Declined by Utility	1
Not Off/Term	1
Requirements Not Met	1
Sincere Effort of Payment	2

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

11/01/2020 - 11/30/2020

Company

MetEd

Code Description	Usage Count
LIHEAP	1
Sincere Effort of Payment	6

Penelec

Code Description	Usage Count
CRISIS	2
Not Off/Term	1
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Incorrect Social Security Number	1
Sincere Effort of Payment	3

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

12/01/2020 - 12/31/2020

Company

MetEd

Code Description	Usage Count
Sincere Effort of Payment	2

Penelec

Code Description	Usage Count
CRISIS	2
Declined by Utility	1

West Penn Power

Code Description	Usage Count
Sincere Effort of Payment	1

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

01/01/2021 - 01/31/2021

Company

MetEd

Code Description	Usage Count
CRISIS	2

Penelec

Code Description	Usage Count
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Balance Requirement	2
CRISIS	1
Not Off/Term	4

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

02/01/2021 - 02/28/2021

Company

Penn Power

Code Description	Usage Count
Not Off/Term	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
CRISIS	1
Not Off/Term	1
Sincere Effort of Payment	1

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

03/01/2021 - 03/31/2021

Company

MetEd

Code Description	Usage Count
CRISIS	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
Sincere Effort of Payment	3

West Penn Power

Code Description	Usage Count
CRISIS	1
Requirements Not Met	1
Sincere Effort of Payment	1

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

04/01/2021 - 04/30/2021

Company

MetEd

Code Description	Usage Count
Proof of Income	1
Proof of Income Required	1
Requirements Not Met	2
Sincere Effort of Payment	10

Penelec

Code Description	Usage Count
Additional Payment	1
CRISIS	1
LIHEAP	2
Not Off/Term	1
Requirements Not Met	1
Sincere Effort of Payment	15

Penn Power

Code Description	Usage Count
CRISIS	1
Proof of Income	1
Requirements Not Met	2
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Additional Payment	2
CRISIS	3
LIHEAP	2
Not Off/Term	1
Requirements Not Met	2
Sincere Effort of Payment	14

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

05/01/2021 - 05/31/2021

Company

MetEd

Code Description	Usage Count
Additional Payment	1
CAP Customer	2
Declined by Utility	5
Not Off/Term	8
Requirements Not Met	1
Sincere Effort of Payment	10

Penelec

Code Description	Usage Count
Additional Payment	1
Already Granted	1
Declined by Utility	2
Not Off	2
Not Off/Term	1
Proof of Income	1
Sincere Effort of Payment	11
Unconfirmed Customer	1

Penn Power

Code Description	Usage Count
CAP Customer	2
Not Off/Term	1
Proof of Income	1
Sincere Effort of Payment	5

West Penn Power

Code Description	Usage Count
Additional Payment	4
CAP Customer	3
Declined by Utility	1
Not Off/Term	10
Reconnect Fee	1
Sincere Effort of Payment	10

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

06/01/2021 - 06/30/2021

Company

MetEd

Code Description	Usage Count
Declined by Utility	1
Not Off/Term	6
Proof of Income	1
Sincere Effort of Payment	4

Penelec

Code Description	Usage Count
CAP Customer	1
Not Off/Term	1
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
Not Off/Term	3
Sincere Effort of Payment	2

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

07/01/2021 - 07/31/2021

Company

MetEd

Code Description	Usage Count
Not Off/Term	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
No Funds	2
Program Closed	11

Penn Power

Code Description	Usage Count
Balance Requirement	1
Not Off/Term	1
Sincere Effort of Payment	4

West Penn Power

Code Description	Usage Count
Closed Account	1
Not Eligible	1
Not Off	1
Over Income	1
Reconnect Fee	1

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

08/01/2021 - 08/31/2021

Company

MetEd

Code Description	Usage Count
Additional Payment	3
Not Off/Term	1
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
CAP Customer	1
Not Off/Term	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	4
Not Off	2
Not Off/Term	1

4/22/2024

iPartner 2020 - Pennsylvania  
Denial Code Activity



Date

09/01/2021 - 09/30/2021

Company

MetEd

Code Description	Usage Count
Additional Payment	2
Declined by Utility	1
Incorrect Social Security Number	1

Penelec

Code Description	Usage Count
No Funds	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
Declined by Utility	1
Not Off	4
Sincere Effort of Payment	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

10/01/2021 - 10/31/2021

Company

MetEd

Code Description	Usage Count
CAP Customer	1
CRISIS	3
Incorrect Social Security Number	1
LIHEAP	1
Not Off/Term	2
Proof of Income	1
Sincere Effort of Payment	5

Penelec

Code Description	Usage Count
CRISIS	7
Declined by Utility	2
LIHEAP	7
Not Off/Term	2
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	1
Declined by Utility	1
Not Off/Term	1

West Penn Power

Code Description	Usage Count
Additional Payment	4
CAP Customer	2
CRISIS	3
Declined by Utility	3
LIHEAP	3
Not Off/Term	3
Sincere Effort of Payment	3
Unconfirmed Customer	1



4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

11/01/2021 - 11/30/2021

Company

MetEd

Code Description	Usage Count
Additional Payment	3
Bill Not In Name	1
CRISIS	3
Declined by Utility	2
LIHEAP	3
Not Off/Term	3
Reconnect Fee	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
Additional Payment	4
CRISIS	1
LIHEAP	1
Not Off/Term	3
Reconnect Fee	1
Sincere Effort of Payment	4

Penn Power

Code Description	Usage Count
CAP Customer	1
Declined by Utility	1
Not Off/Term	1

West Penn Power

Code Description	Usage Count
Additional Payment	4
CRISIS	6
Declined by Utility	2
LIHEAP	5
Not Off/Term	3
Requirements Not Met	1
Sincere Effort of Payment	2

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

12/01/2021 - 12/31/2021

Company

MetEd

Code Description	Usage Count
Declined by Utility	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
Additional Payment	1
CRISIS	1
LIHEAP	1
Not Off	2

Penn Power

Code Description	Usage Count
Not Off	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

01/01/2022 - 01/31/2022

Company

MetEd

Code Description	Usage Count
Declined by Utility	1

Penelec

Code Description	Usage Count
Additional Payment	1
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
Additional Payment	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

02/01/2022 - 02/28/2022

Company

MetEd

Code Description	Usage Count
CRISIS	1
Not Off/Term	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
CAP Customer	1
Not Off/Term	2

West Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	1
Not Off/Term	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

03/01/2022 - 03/31/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	7
CRISIS	9
Declined by Utility	2
LIHEAP	3
Not Off/Term	7
Sincere Effort of Payment	2

Penelec

Code Description	Usage Count
Additional Payment	3
CAP Customer	2
CRISIS	7
Declined by Utility	4
Incomplete Application	1
LIHEAP	5
Not Off/Term	2
Not Past Due	1
Over Income	1
Sincere Effort of Payment	3

Penn Power

Code Description	Usage Count
CAP Customer	1
Declined by Utility	3
Not Off/Term	2
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Additional Payment	1
Already Granted	1
CAP Customer	1
CRISIS	5
Declined by Utility	5
LIHEAP	3
Not Eligible	1

Not Off/Term

4

Witness: Mark A. Jones

Sincere Effort of Payment

3

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iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

04/01/2022 - 04/30/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	7
Balance Requirement	1
CAP Customer	3
CRISIS	10
Incomplete Application	1
LIHEAP	6
Not Off/Term	5
Not Past Due	1
Requirements Not Met	1
Sincere Effort of Payment	3

Penelec

Code Description	Usage Count
Additional Payment	17
Balance Requirement	1
CAP Customer	1
CRISIS	17
Declined by Utility	2
LIHEAP	12
Not Off/Term	4
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
Additional Payment	4
Already Granted	1
CRISIS	5
Declined by Utility	1
LIHEAP	5
Not Eligible	1
Not Off/Term	2
Sincere Effort of Payment	3

West Penn Power

Code Description	Usage Count
Additional Payment	10

Balance Requirement	1
CAP Customer	4
CRISIS	15
Declined by Utility	6
LIHEAP	9
Not Off/Term	12
Requirements Not Met	2
Sincere Effort of Payment	11
Wrong Rate Payer	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

05/01/2022 - 05/31/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	13
CRISIS	9
Incorrect Social Security Number	1
LIHEAP	4
Not Off/Term	5
Reconnect Fee	5
Sincere Effort of Payment	10

Penelec

Code Description	Usage Count
Additional Payment	8
CAP Customer	2
Closed Account	1
CRISIS	6
Declined by Utility	2
LIHEAP	5
Not Off	2
Not Off/Term	4
Not Past Due	1
Sincere Effort of Payment	3

Penn Power

Code Description	Usage Count
Additional Payment	3
Bill Not In Name	1
CAP Customer	1
CRISIS	3
LIHEAP	2
Not Past Due	1
Sincere Effort of Payment	3

West Penn Power

Code Description	Usage Count
Additional Payment	8
CAP Customer	5
Closed Account	1

Credit Balance	1
CRISIS	12
Declined by Utility	2
Incorrect Social Security Number	2
LIHEAP	7
Not Off/Term	5
Not Past Due	2
Reconnect Fee	1
Sincere Effort of Payment	11



4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity

Date

06/01/2022 - 06/30/2022

## Company

MetEd

Code Description	Usage Count
Additional Payment	14
Balance Requirement	2
CAP Customer	2
CRISIS	2
Declined by Utility	2
LIHEAP	1
Not Off/Term	3
Not Past Due	2
Reconnect Fee	1
Sincere Effort of Payment	9

## Penelec

Code Description	Usage Count
No Funds	6
Program Closed	1

## Penn Power

Code Description	Usage Count
Additional Payment	3
CAP Customer	1
Incomplete Application	1
Not Off/Term	3
Reconnect Fee	1
RP Not In Household	1

## West Penn Power

Code Description	Usage Count
Additional Payment	7
Balance Requirement	1
CRISIS	2
LIHEAP	3
Not Off	2
Not Off/Term	1
Reconnect Fee	4
Sincere Effort of Payment	1

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

07/01/2022 - 07/31/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	11
Balance Requirement	3
CAP Customer	1
Incorrect Social Security Number	1
Not Off/Term	1
Not Past Due	1
Reconnect Fee	2
Security Deposit	1
Sincere Effort of Payment	5

Penelec

Code Description	Usage Count
No Funds	1
Requirements Not Met	1

Penn Power

Code Description	Usage Count
Additional Payment	2
CAP Customer	4
Not Off/Term	2
Reconnect Fee	1
Sincere Effort of Payment	5

West Penn Power

Code Description	Usage Count
Additional Payment	3
CAP Customer	1
Not Off	4
Reconnect Fee	3



4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

08/01/2022 - 08/31/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	8
Balance Requirement	1
CAP Customer	1
Declined by Utility	1
Not Off	2
Not Off/Term	2
Not Past Due	2
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
Additional Payment	4
Balance Requirement	1
CAP Customer	1
Declined by Utility	1
Not Off/Term	2
Sincere Effort of Payment	6

West Penn Power

Code Description	Usage Count
No Funds	5

4/22/2024

iPartner 2021 - Pennsylvania  
Denial Code Activity



Date

09/01/2022 - 09/30/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	6
CAP Customer	2
Not Off	3
Not Off/Term	1
Reconnect Fee	2
Security Deposit	2
Sincere Effort of Payment	1

Penn Power

Code Description	Usage Count
Additional Payment	7
CAP Customer	2
Closed Account	1
Not Off/Term	5
Program Closed	1
Sincere Effort of Payment	3

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

10/01/2022 - 10/31/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	3
Balance Requirement	1
CAP Customer	2
Not Off/Term	6
Reconnect Fee	2
Sincere Effort of Payment	3

Penelec

Code Description	Usage Count
Additional Payment	5
CAP Customer	1
No Funds	2
Not Off/Term	5
Requirements Not Met	1
Sincere Effort of Payment	2

Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	7
Bill Not In Name	1
CAP Customer	5
Declined by Utility	1
Incorrect Social Security Number	1
Not Off/Term	10
Security Deposit	1
Sincere Effort of Payment	4

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

11/01/2022 - 11/30/2022

Company

MetEd

Code Description	Usage Count
Additional Payment	4
CRISIS	20
Incorrect Social Security Number	1
LIHEAP	18
Not Off/Term	4
Over Income	1
Sincere Effort of Payment	3

Penelec

Code Description	Usage Count
Additional Payment	3
CAP Customer	1
CRISIS	20
LIHEAP	17
Not Off/Term	4
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
Additional Payment	1
Bill Not In Name	1
CAP Customer	1
CRISIS	4
LIHEAP	4
Not Off/Term	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	1
CRISIS	11
Declined by Utility	1
LIHEAP	8
Not Off/Term	7
Sincere Effort of Payment	3

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

12/01/2022 - 12/31/2022

Company

MetEd

Code Description	Usage Count
CRISIS	1
LIHEAP	1

Penelec

Code Description	Usage Count
CRISIS	1
LIHEAP	1

West Penn Power

Code Description	Usage Count
CRISIS	1
Not Off/Term	1

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

01/01/2023 - 01/31/2023

Company

MetEd

Code Description

Usage Count

Additional Payment

2

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

02/01/2023 - 02/28/2023

Company

MetEd

Code Description	Usage Count
CRISIS	1
LIHEAP	1
Requirements Not Met	1
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
CAP Customer	1
CRISIS	1
LIHEAP	1

Penn Power

Code Description	Usage Count
CAP Customer	1

West Penn Power

Code Description	Usage Count
CAP Customer	2
Declined by Utility	1

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

03/01/2023 - 03/31/2023

Company

MetEd

Code Description	Usage Count
Additional Payment	2
Balance Requirement	1
CAP Customer	2
CRISIS	3
Declined by Utility	1
LIHEAP	2
Not Off/Term	8
Proof of Income	1
Sincere Effort of Payment	22

Penelec

Code Description	Usage Count
Additional Payment	3
CRISIS	1
Declined by Utility	2
LIHEAP	1
Not Off/Term	3
Not Past Due	1
Sincere Effort of Payment	24

Penn Power

Code Description	Usage Count
Additional Payment	2
Balance Requirement	1
CAP Customer	1
CRISIS	3
LIHEAP	2
Sincere Effort of Payment	8

West Penn Power

Code Description	Usage Count
Additional Payment	9
Already Granted	1
Balance Requirement	1
CAP Customer	4
Credit Balance	1

CRISIS	11
Incorrect Social Security Number	1
LIHEAP	8
Not Off/Term	9
Proof of Income	1
Sincere Effort of Payment	25



4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

04/01/2023 - 04/30/2023

Company

MetEd

Code Description	Usage Count
Additional Payment	12
Balance Requirement	1
CAP Customer	3
CRISIS	30
Declined by Utility	1
Incorrect Social Security Number	2
LIHEAP	22
Not Off/Term	7
Over Income	1
Sincere Effort of Payment	18

Penelec

Code Description	Usage Count
Additional Payment	11
Balance Requirement	4
Closed Account	1
CRISIS	26
Declined by Utility	2
Incorrect Social Security Number	3
LIHEAP	17
No Funds	6
Not Off	17
Not Off/Term	2
Program Closed	1
Proof of Income Required	1
Sincere Effort of Payment	26

Penn Power

Code Description	Usage Count
Additional Payment	5
CAP Customer	3
CRISIS	10
Declined by Utility	1
LIHEAP	9
Not Off/Term	1

West Penn Power	Sincere Effort of Payment	2
	Code Description	Usage Count
	Additional Payment	27
	Already Applied	1
	Balance Requirement	1
	CAP Customer	2
	CRISIS	33
	Declined by Utility	1
	Incorrect Social Security Number	1
	LIHEAP	25
	Not Off	7
	Not Off/Term	5
	Over Income	2
	Sincere Effort of Payment	16
	Unconfirmed Customer	1

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

05/01/2023 - 05/31/2023

Company

MetEd

Code Description	Usage Count
Additional Payment	10
CRISIS	3
Incorrect Social Security Number	1
LIHEAP	3
Not Off	19
Not Off/Term	21
Reconnect Fee	1
Security Deposit	1
Sincere Effort of Payment	9

Penelec

Code Description	Usage Count
No Funds	1

Penn Power

Code Description	Usage Count
Additional Payment	1
Balance Requirement	1
CAP Customer	1
CRISIS	6
Declined by Utility	1
LIHEAP	6
Not Off/Term	4
Sincere Effort of Payment	7

West Penn Power

Code Description	Usage Count
Additional Payment	4
CRISIS	4
Declined by Utility	3
LIHEAP	4
No Funds	1
Not Off	4
Program Closed	1
Sincere Effort of Payment	8

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

06/01/2023 - 06/30/2023

Company

MetEd

Code Description	Usage Count
Declined by Utility	2
No Funds	2
Not Off	5
Sincere Effort of Payment	1

Penelec

Code Description	Usage Count
No Funds	2
Program Closed	1

Penn Power

Code Description	Usage Count
Additional Payment	1
Declined by Utility	1
Not Off	1
Sincere Effort of Payment	1

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

07/01/2023 - 07/31/2023

Company

Penn Power

Code Description	Usage Count
Not Off	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
No Funds	1

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

08/01/2023 - 08/31/2023

Company

Penn Power

Code Description	Usage Count
Additional Payment	7
Declined by Utility	2
Not Off	3
Reconnect Fee	2
Sincere Effort of Payment	4

4/22/2024

iPartner 2022 - Pennsylvania  
Denial Code Activity



Date

09/01/2023 - 09/30/2023

Company

MetEd

Code Description	Usage Count
No Funds	1

Penn Power

Code Description	Usage Count
Additional Payment	1
Closed Account	1
Sincere Effort of Payment	6

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

10/01/2023 - 10/31/2023

Company

MetEd

Code Description	Usage Count
Additional Payment	1
CAP Customer	3
Sincere Effort of Payment	5

Penelec

Code Description	Usage Count
Closed Account	1
Not Off/Term	2
Security Deposit	1
Sincere Effort of Payment	13

Penn Power

Code Description	Usage Count
Additional Payment	3
CAP Customer	1
Not Off/Term	1
Reconnect Fee	1
Sincere Effort of Payment	5

West Penn Power

Code Description	Usage Count
Additional Payment	1
CAP Customer	2
Declined by Utility	1
Not Off/Term	1
Sincere Effort of Payment	7

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

11/01/2023 - 11/30/2023

Company

MetEd

Code Description	Usage Count
Additional Payment	3
CAP Customer	1
CRISIS	33
LIHEAP	29
Not Off/Term	1
Sincere Effort of Payment	10

Penelec

Code Description	Usage Count
Additional Payment	2
CAP Customer	2
CRISIS	37
Declined by Utility	1
LIHEAP	32
Not Off/Term	2
Sincere Effort of Payment	19

Penn Power

Code Description	Usage Count
CAP Customer	1
CRISIS	10
LIHEAP	8
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	8
CAP Customer	2
Closed Account	1
CRISIS	50
Declined by Utility	2
LIHEAP	40
Not Off/Term	4
Requirements Not Met	1
Sincere Effort of Payment	19
Wrong Rate Payer	1

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

12/01/2023 - 12/31/2023

Company

MetEd

Code Description	Usage Count
CRISIS	6
LIHEAP	6
Not Off/Term	1
Sincere Effort of Payment	6

Penelec

Code Description	Usage Count
CRISIS	7
LIHEAP	7
Sincere Effort of Payment	7

Penn Power

Code Description	Usage Count
CRISIS	1
LIHEAP	1
Sincere Effort of Payment	1

West Penn Power

Code Description	Usage Count
Additional Payment	1
CRISIS	9
LIHEAP	9
Not Off/Term	1
Requirements Not Met	1
Sincere Effort of Payment	8

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

01/01/2024 - 01/31/2024

Rate District

MetEd

Code Description	Usage Count
Additional Payment	1
CAP Customer	1
CRISIS	5
Declined by Utility	1
LIHEAP	4
Not Off/Term	1
Sincere Effort of Payment	7

Penelec

Code Description	Usage Count
CRISIS	2
Declined by Utility	1
Sincere Effort of Payment	5

Penn Power

Code Description	Usage Count
CRISIS	1
LIHEAP	1
Sincere Effort of Payment	2

West Penn Power

Code Description	Usage Count
Additional Payment	1
Closed Account	1
CRISIS	7
LIHEAP	3
Sincere Effort of Payment	6

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

02/01/2024 - 02/29/2024

Rate District

MetEd

Code Description	Usage Count
Additional Payment	2
CAP Customer	1
Closed Account	1
CRISIS	4
Declined by Utility	1
LIHEAP	3
Not Off/Term	1
Sincere Effort of Payment	5

Penelec

Code Description	Usage Count
Additional Payment	1
CRISIS	14
LIHEAP	13
Not Off/Term	1
Sincere Effort of Payment	11

Penn Power

Code Description	Usage Count
CRISIS	1
LIHEAP	1
Not Off/Term	1

West Penn Power

Code Description	Usage Count
CRISIS	4
LIHEAP	3
Not Off/Term	1
Sincere Effort of Payment	3

4/22/2024

iPartner 2023 - Pennsylvania  
Denial Code Activity



Date

03/01/2024 - 03/31/2024

Rate District

MetEd

Code Description	Usage Count
Additional Payment	11
Balance Requirement	2
CAP Customer	3
CRISIS	31
LIHEAP	28
Not Off/Term	6
Sincere Effort of Payment	36

Penelec

Code Description	Usage Count
Additional Payment	3
CAP Customer	2
CRISIS	48
LIHEAP	44
Not Off/Term	4
Sincere Effort of Payment	50

Penn Power

Code Description	Usage Count
CRISIS	10
LIHEAP	7
Not Off/Term	3
Sincere Effort of Payment	11

West Penn Power

Code Description	Usage Count
Additional Payment	9
CAP Customer	10
CRISIS	41
LIHEAP	38
Not Off/Term	14
Over Income	1
Sincere Effort of Payment	49

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 3**

“For 2019 to present, disaggregated by month and year (as of the last day of the month/year), and Rate District, please indicate:

- a. The average amount of approved FE PA Hardship Fund grants;
- b. The total dollar value of approved FE PA Hardship Fund grants;
- c. The total grant dollars available through FE PA’s Hardship Fund;
- d. The total administrative cost of FE PA’s Hardship Fund;
- e. Any months in which FE PA’s Hardship Fund grant funding was fully depleted.

Please provide this data in a live excel spreadsheet.”

**RESPONSE:**

- a-b. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 3, Attachment A.
- c. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 3, Attachment B.
- d. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 3, Attachment C.
- e. See FE PA Response to CAUSE-PA Interrogatory Set II, No. 3, Attachment B.

Met-Ed																		
Average Amount of Approved Hardship Fund Grants							Total Dollar Value Approved											
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024					
Jan	\$399	\$349	\$369	\$426	\$381	\$0	\$	3,594	\$	2,094	\$	4,060	\$	426	\$	1,144	\$	-
Feb	\$313	\$321	\$454	\$363	\$0	\$282	\$	1,880	\$	1,284	\$	4,539	\$	2,538	\$	-	\$	282
Mar	\$331	\$348	\$469	\$319	\$344	\$307	\$	22,162	\$	19,470	\$	4,221	\$	26,172	\$	37,484	\$	24,842
Apr	\$372	\$370	\$411	\$370	\$373		\$	75,096	\$	38,878	\$	22,988	\$	49,198	\$	103,069		
May	\$362	\$353	\$406	\$368	\$370		\$	41,220	\$	57,158	\$	79,250	\$	51,158	\$	29,986		
Jun	\$451	\$344	\$338	\$321	\$384		\$	11,286	\$	38,876	\$	40,513	\$	62,510	\$	12,300		
Jul	\$0	\$354	\$310	\$326	\$0		\$	-	\$	38,588	\$	29,786	\$	88,021	\$	-		
Aug	\$0	\$330	\$327	\$337	\$0		\$	-	\$	29,738	\$	25,520	\$	45,510	\$	-		
Sep	\$0	\$371	\$313	\$408	\$0		\$	-	\$	59,335	\$	25,002	\$	13,469	\$	-		
Oct	\$346	\$386	\$371	\$314	\$305		\$	34,644	\$	32,803	\$	28,972	\$	44,027	\$	3,654		
Nov	\$352	\$363	\$322	\$292	\$337		\$	14,098	\$	4,713	\$	13,544	\$	18,966	\$	7,422		
Dec	\$411	\$398	\$496	\$417	\$500		\$	3,284	\$	2,386	\$	496	\$	1,666	\$	2,000		

Penelec																		
Average Amount of Approved Hardship Fund Grants							Total Dollar Value Approved											
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024					
Jan	\$416	\$349	\$381	\$336	\$498	\$0	\$	4,544	\$	3,836	\$	2,664	\$	672	\$	498	\$	-
Feb	\$267	\$369	\$356	\$303	\$434	\$436	\$	534	\$	5,536	\$	3,912	\$	2,118	\$	434	\$	1,308
Mar	\$324	\$317	\$428	\$305	\$312	\$332	\$	30,410	\$	16,792	\$	5,136	\$	26,832	\$	32,088	\$	19,250
Apr	\$380	\$378	\$424	\$353	\$359		\$	30,426	\$	32,924	\$	33,046	\$	45,598	\$	59,638		
May	\$0	\$337	\$409	\$405	\$0		\$	-	\$	40,751	\$	63,366	\$	38,068	\$	-		
Jun	\$0	\$369	\$359	\$327	\$0		\$	-	\$	44,666	\$	10,756	\$	982	\$	-		
Jul	\$0	\$326	\$0	\$0	\$0		\$	-	\$	27,033	\$	-	\$	-	\$	-		
Aug	\$0	\$324	\$0	\$0	\$0		\$	-	\$	35,627	\$	-	\$	-	\$	-		
Sep	\$0	\$356	\$0	\$0	\$0		\$	-	\$	24,902	\$	-	\$	-	\$	-		
Oct	\$333	\$389	\$330	\$293	\$403		\$	38,998	\$	32,246	\$	18,488	\$	35,708	\$	7,658		
Nov	\$319	\$383	\$326	\$299	\$278		\$	18,504	\$	2,682	\$	11,750	\$	15,568	\$	4,724		
Dec	\$443	\$386	\$497	\$344	\$475		\$	2,214	\$	4,242	\$	1,492	\$	2,066	\$	1,426		

Penn Power																		
Average Amount of Approved Hardship Fund Grants							Total Dollar Value Approved											
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024					
Jan	\$498	\$372	\$0	\$320	\$0	\$0	\$	498	\$	372	\$	-	\$	320	\$	-	\$	-
Feb	\$308	\$228	\$0	\$317	\$0	\$314	\$	1,230	\$	228	\$	-	\$	634	\$	-	\$	314
Mar	\$348	\$271	\$400	\$300	\$331	\$308	\$	14,966	\$	7,318	\$	2,398	\$	6,306	\$	10,588	\$	7,707
Apr	\$387	\$383	\$436	\$382	\$371		\$	28,602	\$	8,036	\$	11,348	\$	17,560	\$	34,166		
May	\$419	\$348	\$407	\$401	\$409		\$	2,516	\$	13,238	\$	20,749	\$	16,026	\$	13,485		
Jun	\$445	\$367	\$396	\$289	\$500		\$	890	\$	5,864	\$	13,065	\$	11,840	\$	500		
Jul	\$379	\$334	\$345	\$351	\$426		\$	3,028	\$	9,341	\$	10,704	\$	22,450	\$	1,277		
Aug	\$319	\$378	\$329	\$317	\$407		\$	638	\$	7,188	\$	9,222	\$	26,944	\$	2,037		
Sep	\$0	\$354	\$317	\$343	\$341		\$	-	\$	16,639	\$	6,349	\$	17,826	\$	341		
Oct	\$354	\$387	\$359	\$323	\$323		\$	12,748	\$	5,803	\$	7,546	\$	12,278	\$	1,617		
Nov	\$319	\$500	\$396	\$355	\$351		\$	7,008	\$	500	\$	3,958	\$	6,032	\$	4,558		
Dec	\$206	\$488	\$192	\$470	\$341		\$	206	\$	1,952	\$	192	\$	2,352	\$	341		

West Penn Power																		
Average Amount of Approved Hardship Fund Grants							Total Dollar Value Approved											
a.	2019	2020	2021	2022	2023	2024	b.	2019	2020	2021	2022	2023	2024					
Jan	\$390	\$377	\$467	\$367	\$500	\$0	\$	5,070	\$	2,260	\$	2,336	\$	1,468	\$	1,500	\$	-
Feb	\$311	\$364	\$328	\$357	\$0	\$267	\$	5,286	\$	2,548	\$	1,639	\$	2,858	\$	-	\$	2,932
Mar	\$332	\$308	\$458	\$288	\$327	\$307	\$	45,416	\$	28,026	\$	8,240	\$	27,674	\$	53,880	\$	31,280
Apr	\$389	\$363	\$429	\$363	\$369		\$	28,430	\$	43,964	\$	39,512	\$	64,184	\$	91,254		
May	\$382	\$334	\$402	\$360	\$424		\$	6,106	\$	62,367	\$	90,530	\$	57,968	\$	8,470		
Jun	\$0	\$366	\$357	\$386	\$0		\$	-	\$	43,576	\$	50,362	\$	15,456	\$	-		
Jul	\$0	\$363	\$368	\$424	\$0		\$	-	\$	37,428	\$	7,352	\$	12,732	\$	-		
Aug	\$0	\$339	\$395	\$402	\$0		\$	-	\$	33,516	\$	11,856	\$	2,816	\$	-		
Sep	\$0	\$351	\$415	\$0	\$0		\$	-	\$	54,464	\$	4,568	\$	-	\$	-		
Oct	\$334	\$334	\$321	\$323	\$425		\$	62,844	\$	20,728	\$	22,146	\$	43,340	\$	7,232		
Nov	\$347	\$386	\$303	\$359	\$343		\$	26,048	\$	2,705	\$	13,018	\$	17,590	\$	15,800		
Dec	\$339	\$475	\$331	\$393	\$296		\$	2,708	\$	1,900	\$	994	\$	1,966	\$	296		

**Met-Ed**

<u>Month</u>	<u>Year</u>	<u>End of Month Balance</u>
January	2019	\$ 151,694
February	2019	\$ 149,814
March	2019	\$ 127,652
April	2019	\$ 52,556
May	2019	\$ 11,336
June	2019	\$ 50
July	2019	\$ 50
August	2019	\$ 50
September	2019	\$ 50
<b>October</b>	<b>2019</b>	<b>\$ 199,406</b>
November	2019	\$ 185,308
December	2019	\$ 182,024
January	2020	\$ 179,930
February	2020	\$ 178,646
March	2020	\$ 159,176
April	2020	\$ 278,131
May	2020	\$ 220,973
June	2020	\$ 182,097
July	2020	\$ 143,509
August	2020	\$ 113,771
September	2020	\$ 54,436
<b>October</b>	<b>2020</b>	<b>\$ 255,633</b>
November	2020	\$ 250,920
December	2020	\$ 248,534
January	2021	\$ 244,474
February	2021	\$ 239,935
March	2021	\$ 385,714
April	2021	\$ 362,726
May	2021	\$ 283,476
June	2021	\$ 242,963
July	2021	\$ 213,177
August	2021	\$ 187,657
September	2021	\$ 162,656
<b>October</b>	<b>2021</b>	<b>\$ 367,684</b>
November	2021	\$ 354,140
December	2021	\$ 353,644
January	2022	\$ 353,218
February	2022	\$ 350,680
March	2022	\$ 324,508

Oct 1 - Starts new program year, yearly allotments are added to each company

Out of Funds

April	2022	\$	275,310
May	2022	\$	224,152
June	2022	\$	161,642
July	2022	\$	73,621
August	2022	\$	28,111
September	2022	\$	14,642
October	2022	\$	204,615
November	2022	\$	185,649
December	2022	\$	183,983
January	2023	\$	182,839
February	2023	\$	182,839
March	2023	\$	145,355
April	2023	\$	42,286
May	2023	\$	12,300
June	2023	\$	-
July	2023	\$	-
August	2023	\$	-
September	2023	\$	-
October	2023	\$	230,346
November	2023	\$	222,924
December	2023	\$	220,924
January	2024	\$	220,924
February	2024	\$	220,642
March	2024	\$	233,015

**Penelec**

<u>Month</u>	<u>Year</u>	<u>End of Month Balance</u>
January	2019	\$ 61,370
February	2019	\$ 60,836
March	2019	\$ 30,426
April	2019	\$ -
May	2019	\$ -
June	2019	\$ -
July	2019	\$ -
August	2019	\$ -
September	2019	\$ -
<b>October</b>	<b>2019</b>	<b>\$ 107,002</b>
November	2019	\$ 88,498
December	2019	\$ 86,284
January	2020	\$ 82,448
February	2020	\$ 76,912
March	2020	\$ 60,120
April	2020	\$ 185,029
May	2020	\$ 144,278
June	2020	\$ 99,612
July	2020	\$ 72,579
August	2020	\$ 36,952
September	2020	\$ 12,050
<b>October</b>	<b>2020</b>	<b>\$ 125,804</b>
November	2020	\$ 123,122
December	2020	\$ 118,880
January	2021	\$ 116,216
February	2021	\$ 112,304
March	2021	\$ 107,168
April	2021	\$ 74,122
May	2021	\$ 10,756
June	2021	\$ -
July	2021	\$ -
August	2021	\$ -
September	2021	\$ -
<b>October</b>	<b>2021</b>	<b>\$ 127,512</b>
November	2021	\$ 115,762
December	2021	\$ 114,270
January	2022	\$ 113,598
February	2022	\$ 111,480
March	2022	\$ 84,648

Oct 1 - Starts new program year, yearly allotments are added to each company

Out of Funds

April	2022	\$	39,050
May	2022	\$	982
June	2022	\$	-
July	2022	\$	-
August	2022	\$	-
September	2022	\$	-
October	2022	\$	110,292
November	2022	\$	94,724
December	2022	\$	92,658
January	2023	\$	92,160
February	2023	\$	91,726
March	2023	\$	59,638
April	2023	\$	-
May	2023	\$	-
June	2023	\$	-
July	2023	\$	-
August	2023	\$	-
September	2023	\$	-
October	2023	\$	138,342
November	2023	\$	133,618
December	2023	\$	132,192
January	2024	\$	132,192
February	2024	\$	130,884
March	2024	\$	147,805

**Penn Power**

<u>Month</u>	<u>Year</u>	<u>EOM Balance</u>
January	2019	\$ 51,870
February	2019	\$ 50,640
March	2019	\$ 35,674
April	2019	\$ 7,072
May	2019	\$ 4,556
June	2019	\$ 3,666
July	2019	\$ 638
August	2019	\$ -
September	2019	\$ -
October	2019	\$ 59,252
November	2019	\$ 52,244
December	2019	\$ 52,038
January	2020	\$ 51,666
February	2020	\$ 51,438
March	2020	\$ 44,120
April	2020	\$ 143,411
May	2020	\$ 130,173
June	2020	\$ 124,309
July	2020	\$ 114,968
August	2020	\$ 107,780
September	2020	\$ 91,141
October	2020	\$ 157,338
November	2020	\$ 156,838
December	2020	\$ 154,886
January	2021	\$ 154,886
February	2021	\$ 154,886
March	2021	\$ 152,488
April	2021	\$ 141,140
May	2021	\$ 120,391
June	2021	\$ 107,326
July	2021	\$ 96,622
August	2021	\$ 87,400
September	2021	\$ 81,051
October	2021	\$ 145,505
November	2021	\$ 141,547
December	2021	\$ 141,355
January	2022	\$ 141,035
February	2022	\$ 140,401
March	2022	\$ 134,095

Oct 1 - Starts new program year, yearly allotments are added to each company

Out of Funds

April	2022	\$	116,535
May	2022	\$	100,509
June	2022	\$	88,669
July	2022	\$	66,219
August	2022	\$	39,275
September	2022	\$	21,449
October	2022	\$	81,171
November	2022	\$	75,139
December	2022	\$	72,787
January	2023	\$	72,787
February	2023	\$	72,787
March	2023	\$	62,199
April	2023	\$	28,033
May	2023	\$	14,548
June	2023	\$	14,048
July	2023	\$	12,771
August	2023	\$	10,734
September	2023	\$	10,393
October	2023	\$	80,776
November	2023	\$	76,218
December	2023	\$	75,877
January	2024	\$	75,877
February	2024	\$	75,563
March	2024	\$	78,730

**West Penn Power**

<u>Month</u>	<u>Year</u>	<u>End of Month Balance</u>
January	2019	\$ 85,690
February	2019	\$ 80,404
March	2019	\$ 34,988
April	2019	\$ 6,558
May	2019	\$ 452
June	2019	\$ 452
July	2019	\$ 452
August	2019	\$ 452
September	2019	\$ 452
<b>October</b>	<b>2019</b>	<b>\$ 155,608</b>
November	2019	\$ 129,560
December	2019	\$ 126,852
January	2020	\$ 124,592
February	2020	\$ 122,044
March	2020	\$ 94,018
April	2020	\$ 258,393
May	2020	\$ 196,026
June	2020	\$ 152,450
July	2020	\$ 115,022
August	2020	\$ 81,506
September	2020	\$ 27,042
<b>October</b>	<b>2020</b>	<b>\$ 224,314</b>
November	2020	\$ 221,609
December	2020	\$ 219,709
January	2021	\$ 217,373
February	2021	\$ 215,734
March	2021	\$ 207,494
April	2021	\$ 167,982
May	2021	\$ 77,452
June	2021	\$ 27,090
July	2021	\$ 19,738
August	2021	\$ 7,882
September	2021	\$ 3,314
<b>October</b>	<b>2021</b>	<b>\$ 199,168</b>
November	2021	\$ 186,150
December	2021	\$ 185,156
January	2022	\$ 183,688
February	2022	\$ 180,830
March	2022	\$ 153,156

Oct 1 - Starts new program year, yearly allotments are added to each company

Out of Funds

April	2022	\$	88,972
May	2022	\$	31,004
June	2022	\$	15,548
July	2022	\$	2,816
August	2022	\$	-
September	2022	\$	-
October	2022	\$	174,660
November	2022	\$	157,070
December	2022	\$	155,104
January	2023	\$	153,604
February	2023	\$	153,604
March	2023	\$	99,724
April	2023	\$	8,470
May	2023	\$	-
June	2023	\$	-
July	2023	\$	-
August	2023	\$	-
September	2023	\$	-
October	2023	\$	210,768
November	2023	\$	194,968
December	2023	\$	194,772
January	2024	\$	194,772
February	2024	\$	191,840
March	2024	\$	206,229

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 4**

“For 2019 to date, disaggregated by year, as of the last day of the year, please indicate the amount of contributions to FE PA’s Hardship Fund, and indicate the source(s) these contributions. Please also indicate that for 2024, 2025, and 2026, disaggregated by year, what FE PA projects as the annual contribution amount to FE PA’s Hardship Fund, and the source(s) of contribution of these funds.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set II, No. 4, Attachment A.

	<b>Utility Contributions/Dependent on Match from Customer Contributions*</b>	<b>Ratepayer/Employee Contributions</b>	<b>PA Consolidation</b>
<b>2019</b>			
Met-Ed	\$114,404	\$114,404	
Penelec	\$72,859	\$72,859	
Penn Power	\$36,639	\$36,639	
West Penn	\$108,224	\$144,381	
<b>2020</b>			
Met-Ed	\$120,352	\$120,352	
Penelec	\$73,506	\$73,506	
Penn Power	\$37,114	\$37,114	
West Penn	\$108,089	\$142,820	
<b>2021</b>			
Met-Ed	\$118,207	\$118,207	
Penelec	\$74,929	\$74,929	
Penn Power	\$36,385	\$36,610	
West Penn	\$106,305	\$137,835	
<b>2022</b>			
Met-Ed	\$114,531	\$114,531	
Penelec	\$70,717	\$70,717	
Penn Power	\$35,120	\$35,177	
West Penn	\$107,010	\$130,119	
<b>2023</b>			
Met-Ed	\$115,833	\$115,833	
Penelec	\$69,827	\$69,827	
Penn Power	\$34,103	\$34,103	
West Penn	\$105,422	\$132,178	
<b>2024</b>			
Met-Ed	\$117,000		\$43,000
Penelec	\$73,000		\$42,000
Penn Power	\$36,000		\$12,500
West Penn	\$109,000		\$52,500
<b>2025</b>			
Met-Ed	\$117,000		\$43,000
Penelec	\$73,000		\$42,000
Penn Power	\$36,000		\$12,500
West Penn	\$109,000		\$52,500

**2026**

<b>Met-Ed</b>	\$117,000	\$43,000
<b>Penelec</b>	\$73,000	\$42,000
<b>Penn Power</b>	\$36,000	\$12,500
<b>West Penn</b>	\$109,000	\$52,500

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 5**

“What are the applicable policies and procedures for awarding FE PA Hardship Fund grants, including policies and procedures related to FE PA Hardship Fund grants for its administering agencies? Please provide a copy of any and all written policies and/or procedures, memoranda, training materials, call scripts, emails, or other written documents which describe the policies and procedures related to awarding a FE PA Hardship Fund grant.”

**RESPONSE:**

The following attachments are written materials from Dollar Energy Fund describing policy and procedures to award grants for the Dollar Energy Fund staff and its partnering intake agencies.

- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment A for the new-hire training manual.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment B for a Low Income Home Energy Assistance Program (LIHEAP) training PowerPoint.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment C for a training PowerPoint for Grants – The Hardship Program.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment D for a training PowerPoint for Grant – The Systems.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment E for a training PowerPoint for Service Off – PCAP or a Grant? Helping Disconnected Customers.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment F for a training PowerPoint for Pending Accounts.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment G for an Income Chart for CAP and Hardship Programs.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment H for a training document for Pending Account Procedures.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment I for a training PowerPoint for Income Verification.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment J for various income procedures regarding grants.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachment K for a training document for Email Instructions and Emails Regarding Hardship Program.

- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachments L for a training PowerPoint for Community-Based Organizations (CBO) for 2023-2024 Dollar Energy Fund Training.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachments M for a training document for the iPartner workflow.
- See FE PA Response to CAUSE-PA Interrogatory Set II, No. 5 Attachments N for a training document on Dollar Energy Fund Notifications.

## CHART-CAP/Hardship

### Income Chart for CAP and Hardship Programs

*Words in italics are the terms used in the systems for the Income Type.*

<b>Income Type</b>	<b>Acceptable Proof of Income</b>	<b>Grant Exceptions</b>	<b>CSR Clarifications</b>
<p><b>Boarders/Roomers</b></p> <p><b>Family member:</b> Include as a household member. Include their gross income they receive.</p> <p><b>Non-family member:</b> Include as a household member. DO NOT include their gross income. Use 50% of the amount they pay for room/board. List that amount as <i>Rental Income</i> under the RP.</p>	<p>For Rental Property, RP can send:</p> <ul style="list-style-type: none"> <li>• Copy of the lease or rental agreement</li> <li>• Copy of a receipt for the rent</li> </ul> <p>Nonfamily member Roomer/boarder should send:</p> <ul style="list-style-type: none"> <li>• Signed letter stating how much they send in rental income per month</li> </ul>		<p>Ask: Is the person renting a room related to you?</p> <p>Put the rental income under the ratepayer.</p> <p><u>Significant other/fiancé:</u> is <b>NOT</b> considered a boarder or renter even if they pay RP rent- they must be included in the HH and their income added to HH income. Do not count rent paid.</p>
<p><b>Black Lung Benefits</b></p>	<p>Coal mine worker’s compensation of expected benefit statement Bank statement from the last 30 days (last resort)</p>		
<p><b>Cash Assistance</b> <i>Public Assistance</i></p>	<p>Benefits statement (both sides) Printout from DPW website Letter from caseworker on letterhead</p>		<p>CRM verification is good for up to 6 months</p> <p>SNAP benefits/Food Stamps are not counted as income</p>
<p><b>Child/Spousal Support</b></p>	<p>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.GoProgam.com">www.GoProgam.com</a> Bank Statement (last 30 days) Passthrough Welfare: Benefits statement from welfare both sides</p> <p>Voluntary child support or spousal support: Use other income form</p>		<p>Note must specify if child and/or spousal support</p> <p>Child support must be noted under child's name in CRM and MyApp. Does not count for CAP.</p> <p>Spousal Support is also called alimony</p> <p>Ask: Is the child (spousal) support court ordered?</p> <ul style="list-style-type: none"> <li>• If voluntary: complete other income form, no proof is needed.</li> </ul>

			<ul style="list-style-type: none"> <li>If court ordered: proof must be sent in the form of any listed in "acceptable proof" list</li> </ul> <p>The Eppicard system has made some changes, so customer may say words like Eppicard or way2go card and that is the documentation we need</p>
<b>Foster Care/Adoption</b>	Statement from Social Services Letter from the adoption agency or state or county office stating amount of compensation that will be received Copy of all checks (last 30 days)		<p>Not needed for cap.</p> <p>This income should be entered under the child's name in CRM and MyApp.</p>
<b>Investment Income</b> <i>Interest</i>	Dividend Statement Bank Statement showing payment		<p>This is typically a payment they receive for investments (dividends)</p> <p>If applying only for CAP, only include if they receive it on a monthly basis.</p>
<b>Long Term or Short-Term Disability</b> <i>Disability</i>	Benefits statement Copy of disability checks/check stubs (last 30 days) Bank statement (last 30 days)		
<b>Other Income</b> (includes cash contributions)	Other Income Form		<p>Make sure you verify the other income in CRM. Other income is the only income CSRs verify.</p> <p><a href="#">Other Income</a> / <a href="#">Verifying Other Income</a></p>
<b>Retirement Income</b>	<p>INCOME IS LISTED AS <b>PENSION</b> AS ALL TYPES IN CRM</p> <p><i>Called "Pension", "IRA", "Annuity"</i></p> <p>If Pension: Pension board letter, Copy of pension check with stub attached</p> <p>Copy of 1099 Copy of Form 5498 for Roth IRA Copy of pension check with stub attached Bank statement from current year</p>		<p>Pension Board letter is typically only received once. We can accept pension board letters from previous years.</p> <p>1099's must be from the previous year</p> <ul style="list-style-type: none"> <li>Until April, 1099 acceptable from previous two years because they may not have received their new 1099</li> </ul> <p>Check stubs can be from the current year</p> <p>CRM verification is good for the rest of the year.</p>

			<p>Only counted if received on a monthly basis</p> <ul style="list-style-type: none"> <li>Ask: Are you receiving retirement payments on a monthly basis?</li> </ul>
<b>Rental Income</b>	<p>Copy of the lease or rental agreement Copy of a receipt for the rent</p> <p>A confirmed signed statement from a renter stating they pay RP rental income. This is a verifiable document.</p>		<p>Nonfamily member Roomer/boarder should send a signed letter stating how much they send in rental income per month</p>
<b>Royalties</b>	<p>Monthly Royalty Statement Copy of royalty check (last 30 days) Bank Statement (last 30 days) Other Income Form (last resort)</p>		<p>These are the result of gas drilling operations on the customer’s property. The customer may say they have a “gas well”.</p> <p>Ask: Do you receive royalty checks from the gas company?</p>
<b>Salary &amp; Wages (Employment)</b>	<p><b>Note:</b> Bank statements, screenshots or any other format that shows <u>net</u> only are NOT acceptable.</p> <p>Paystubs for the last 30 days Letter from employer Handwritten Paystubs? Complete other income form</p> <p>School teachers/bus drivers for school for CAP: Advise to send last paystubs received (We will calculate YTD method).</p> <p>Other seasonal workers, laid off, for CAP: If not receiving UEC, treat as 0 income</p> <p>Uber/Lyft/DoorDash/Instacart/ETC: Last 30 days of payment summary</p> <p>Military Pay: Military LES (Leave &amp; Earnings Statement) from last 30 days</p> <p>17-year-old and younger/18-year-old still in high school: Wages are not counted as income for any program.</p>	<p>Seasonal/school employee: Only request income received in last 30 days if applying for only a grant</p> <p>1099 is not acceptable</p>	<p>Handwritten paystubs: Make sure the customer is taking a picture and then uploading or emailing. Fax is not a good option.</p> <p>Uber/Lyft/DoorDash/Instacart/ETC: Make sure to note if the customer didn’t work all the weeks this month</p> <p>Applying only for CAP with a new job (don’t have 30 days’ worth of paystubs)? Ask for letter from employer. If not able to provide, proceed with zero income. Advise to send 30 days’ worth of paystubs when received.</p> <p>Applying for a grant with a new job (don’t have 30 days’ worth of paystubs)? Advise to send all POI received in the last 30 days. If they are sending less than 30 days’ worth of POI, document this in your notes.</p> <p>Ex: RP lost job applying for grant, only has 1 biweekly PS from last 30 days</p> <p><b>17-year-old and younger/18-year-old still in high school: Wages are not counted as income for any program (including Hardship).</b></p>

			<p><b>Enter HH member as 0 income in all systems.</b></p> <p>For school teachers and bus drivers for school for CAP- be sure notes include RP or HH member name is school teacher or bus driver. Advised to send last paycheck received for YTD. [Grants use last 30 days so use zero income if applying during the summer].</p>
<p><b>Self-Employment</b></p> <p>Includes subcontractors</p>	<p>Quarterly statement from accountant QuickBooks or other type of online ledger Statement from Accountant on letterhead stating the income from the last 30 days Tax Return 1040 and schedule C Copy of 1099 If in partnership, Schedule K1 &amp; Schedule E Other Income Form (last resort)</p> <p>Subcontractor: 1099 for previous tax year is acceptable if they don't have paystubs</p>	<p>1040 and Schedule C can only be accepted up to 30 days after filing</p> <p>1099 can only be accepted up to 30 days after filing</p> <p>Customers applying for a grant must send: Quarterly statement from accountant QuickBooks or other type of online ledger Statement from Accountant on letterhead stating the income from the last 30 days</p>	<p>If customer is upset because they are over income based on 1040 income verification say: When we verified your self-employment income, the income department takes certain deductions into account but not all of your deductions. The deductions we take are set in place by your utility company.</p> <p>Ask clarifying questions because the tax information may not be a good indicator of what is going on now. Can they get a quarterly statement or letter from an accountant?</p>
<p><b>Social Security</b></p> <p>Social Security SS Disability SSI Survivor Benefits list under Social Security</p>	<p>Social Security Benefit Statement (also called award letter) Current year <a href="http://www.socialsecurity.gov/myaccount">www.socialsecurity.gov/myaccount</a> or call 1-800-772-1213 Bank Statement Letter from bank on letterhead confirming direct deposits Copy of 1099</p> <p><b>SSI State Supplement of \$22.10 or less-</b> No verification needed</p>		<p>Clarifying question to ask if customer is close to FPIG max: Is that the amount you receive direct deposited?</p> <p>CRM verification is good for the rest of the year.</p> <p><b>SSI State Supplement of \$22.10 or less:</b> Enter in CRM under <i>Public Assistance</i> Add to SSI total in OSCAR and/or MyApp.</p> <p>Bank Statement</p>

			<ul style="list-style-type: none"> <li>SSA, SSD, &amp;SSP- can be from the CURRENT year. It does not have to be from the last 30 days. As long as bank statement shows all deposits for that month, it is verifiable.</li> <li>SSI- must be from the past month.</li> </ul> <p>We cannot accept a previous year's letter or a 1099 for SSI, only for SSA/SSD.</p> <ul style="list-style-type: none"> <li><u>Exception:</u> If an elderly (62+) customer reports <b>SSI only (no other SS)</b> and sends proof from the previous year, you can add the increase from the current year and verify this income.</li> </ul>
<b>Stipend</b>	W2/1099/ Letter stating the offertory amount of the stipend (yearly/monthly)		<p><b>DO NOT</b> complete an "Other Income" Form. Proof of Income is needed.</p> <p>For now, Stipends must be entered as "<b>Salary and Wages</b>" until further notice.</p> <p>Take the amount of the stipend received for the semester and divide by 5 to get the monthly amount.</p>
<b>Unemployment Compensation</b>	Notice of financial determination Unemployment printout – <a href="http://www.uc.pa.gov">www.uc.pa.gov</a> Bank statement from last 30 days		<p>Only counted if customer is receiving it.</p> <p>If customer states they have been approved but are not receiving it yet do not count as income.</p>
<b>Utility Checks</b>	Copy of utility check If reimbursed on a card, printout from the card (last 30 days) Document from housing that lists the utility reimbursement		<p>Only counted if paid directly to household</p> <p>Ask: Do you receive the utility reimbursement yourself? (meaning do they get a check or direct deposit)</p>
<b>Veterans Benefits</b> <i>Veteran's Income</i>	Letter from VA Benefit statement (current year) Bank Statement from last 30 days		<p>Veteran's benefits are paid through SS so a letter is received every year.</p>

			<b>Note:</b> Veterans benefits / income is either pension or disability. Both are fixed income.
<b>Workman's Compensation</b> <i>Worker's Comp</i>	Letter of determination Benefits statement from last 30 days Copy of checks (last 30 days) Bank statement from last 30 days		
<b>Zero Income</b>	Zero Income Form	Hardship always looks at last 30 days. If income has been received in last 30 days and customer is applying for a grant document/request POI.	<a href="#">Zero Income Customers</a>

Emailed receipts confirming deposits to a bank account are **unacceptable** as POI

Pre-paid debit/credit card statements showing direct deposits from valid sources (Social Security, Department of Public Assistance, etc.) are acceptable in lieu of a bank statement

**Proof of loss of income for wages, social security, unemployment, etc. is NOT required for any program. If a customer contacts us and says they are now Zero Income, we can proceed with a PCAP application immediately. Grants do require the last 30 days POI.**

## Household Members

Scenario	Household Member?	Income Counts?	Notes
<b>Family Member (any)</b> (Includes Significant Others even if they pay rent)	<b>Yes</b>	<b>Yes</b>	Remember to determine if HH member is a minor, and if so, count income based on program
<b>Caregiver (Family Member)</b>	<b>Yes</b>	<b>Yes</b>	
<b>Caregiver (non-family member)</b>	<b>No</b>	<b>No</b>	
<b>Boarder (non-family member living in home <u>and</u> paying rent, but not on lease)</b>	<b>Yes</b>	<b>No</b>	Count 50% of what they pay for room/board as RP's income
<b>Roommate (non-family member living in home, <u>ON</u> the lease)</b>	<b>Yes</b>	<b>Yes</b>	
<b>College Student Living in Dorm</b>	<b>No</b> <i>(not part of parents' household)</i>	<b>No</b>	

<p><b>Child(ren) with 50/50 custody agreement</b></p>	<p><b>Yes</b> <i>(If RP claims them on taxes)</i></p>	<p><b>**</b></p>	<p><b>**Determine if income is counted based on the program you are working</b></p>
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## Special Circumstances

**Please refer to the following situations in helping you determine if someone should be considered a Household Member.**

**Moving in:** Ask: “When will that person be moving in?”

- If they are moving in within the next 30 days, count them.
- If they aren’t sure when the person is moving in, don’t count them
  - Put in your notes why you included or didn’t include someone
    - Ex: Mom moving in within 3 weeks, included in HH

**Moving out:** Ask: “When will that person be moving out?”

- If they are moving out within the next 30 days, don’t count the person.
- If they aren’t sure when the person is moving out, count them
  - Put in your notes why you did or didn’t include someone
    - Ex: RP stated mother-in-law is moving out in 3 weeks, didn’t count in HH

**Children:**

- Live in the home more than 50% of the year, they are counted.
- 50/50 split- who claims on taxes? Count the child if the RP you are speaking to claims the child.
- College students who live on campus/off campus (not with parents), do not count in their parent’s household since they live somewhere else more than 50% of the year
- Baby is not born yet. Don’t count. Advise to callback to update in when child is born.

**Temporary Stays**

- Examples include: military home on leave, home from jail for a brief time, friend or relative staying, etc.
- If you determine the person is only temporarily staying in the household (up to 60 days), don't include them.
  - Put in your notes why you did or didn't include that person
    - Ex: RP stated SP is home on military leave for 2 months. Didn't count in HH

**Temporary Leaves:**

- Examples: Being in hospital, rehab, jail, etc.
- If you determine the person is only temporarily out of the home up to 30 days, include them.
- If it is the ratepayer that is temporarily out of the home, do not remove the RP out of the home.
- If they will be removed for an extended period of time, you would advise to get the utility moved into a different person's name.
  - Put in your notes why you did or didn't include that person:
    - Ex: RP is in hospital for 4 weeks. Included in HH

**When to Include Children's Income**

	CRM	MyApp	OSCAR	Additional Notes:
FE	Yes	Yes	No	<p>*Children's Income is included for Grant purposes only, except for salary/wages.</p> <p>**17 or younger / above 17 and still in high school: Do NOT include Income for PCAP.</p> <p>**Children's Income need to be removed when the record is pushed to OSCAR</p>



## Follow along in your Income Chart



### For most income types we can accept multiple different types of documents

- We'll be talking about some of the most common ones
- Some documentation/verification methods we discuss will only be acceptable for PCAP/WARM, not hardship. Why? The Hardship program will always go by the last 30 days of income.

### If an income type / document is not on your chart then we generally can't verify it

- There may be some exceptions depending on the program

### We won't cover every possible income document in training, some documents are very rare

- For example: Black lung benefits, trust funds, etc... are received very rarely



## Some things to know about paystubs

1

We need to find the payday on paystubs to see if they're recent enough to use. We need the most recent 30 days of paystubs from when the customer applied.

2

We use the gross current amount listed on paystubs. The only deduction we consider is reimbursements.

3

Paystubs will also include a "YTD" amount, this is tracking how much the employee has made throughout the year. In a pinch, we can use this to verify paystubs but it's only acceptable for the PCAP/WARM programs.



# Paystubs

The Link Store, LLC      874-677-0885      4885 E. Dublin Greenville Rd.      Columbus, OH 43061-7820  
 Employer: [REDACTED]      Tax Date:      Federal:      State:      PA: WFO Weekly hourly Payroll 2  
 District: 50157      Manual Set: S      M      Check Number: 23352497  
 Location: 157      Exemption: N/A      Nil      Pay Begin Date: 10/26/2023  
 Add. Amt.:      Pay End Date: 10/14/2023

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Straight Pay	16.30	40.00	662.00	88.00	1,432.00	Fed Withholding	45.31	94.54
Overtime Pay - 1.5 x Rate	24.45	0.50	2.48	2.87	71.04	Fed MEDIE	0.00	22.08
						Fed OASDI EE	41.38	94.83
						PA Unempl EE	0.47	1.02
						PA Withholding	85.54	48.79
						PA Withholding	13.35	31.44
						PA I.S. Tax	1.89	3.01
<b>TOTAL:</b>		<b>40.50</b>	<b>664.48</b>	<b>90.87</b>	<b>1,503.04</b>	<b>TOTAL:</b>	<b>129.55</b>	<b>293.49</b>
Current Total Hours Worked:		40.10						

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			TAXABLE BENEFITS	
Description	Current	YTD	Description	Current	YTD	Description	Current
<b>TOTAL:</b>	0.00	0.00	<b>TOTAL:</b>	0.00	0.00	<b>*TAXABLE</b>	

	TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current	662.48	662.48	129.55	0.00	532.93
YTD	1,523.04	1,523.04	293.49	0.00	1,229.55

Account Type	Account Number	Deposit Amount
On-Demand	XXXXXXXXXXXXXXXXXXXX	932.83

MESSAGE:



### **\*Math loophole alert\***

If we're missing a paystub we can find the amount earned (so long as we have the paystubs before and after the missing paystub).

EX// we receive 3 out of 4 weekly paystubs:

PS 1 – Current gross: \$500 YTD: \$1650

PS 2 – Current gross: \$625 YTD: \$2275

PS 3 – missing

PS 4 – Current gross: \$475 YTD: \$3300

We take the paystub after the missing paystub, and subtract the current gross from its YTD

$$3300 - 475 = \$2825$$

Then we subtract the YTD from the paystub before the missing paystub

$$2825 - 2275 = \$550$$

\$550 is the gross current amount for PS #3. This calculation is exact ☺

# Calendar 2024

January							February							March							April										
Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S
1		1	2	3	4	5	6	5					1	2	3	9						1	2	14		1	2	3	4	5	6
2	7	8	9	10	11	12	13	6	4	5	6	7	8	9	10	10	3	4	5	6	7	8	9	15	7	8	9	10	11	12	13
3	14	15	16	17	18	19	20	7	11	12	13	14	15	16	17	11	10	11	12	13	14	15	16	16	14	15	16	17	18	19	20
4	21	22	23	24	25	26	27	8	18	19	20	21	22	23	24	12	17	18	19	20	21	22	23	17	21	22	23	24	25	26	27
5	28	29	30	31				9	25	26	27	28	29			13	24	25	26	27	28	29	30	18	28	29	30				
																14	31														

May							June							July							August											
Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	
18				1	2	3	4	22						1		27		1	2	3	4	5	6	31						1	2	3
19	5	6	7	8	9	10	11	23	2	3	4	5	6	7	8	28	7	8	9	10	11	12	13	32	4	5	6	7	8	9	10	
20	12	13	14	15	16	17	18	24	9	10	11	12	13	14	15	29	14	15	16	17	18	19	20	33	11	12	13	14	15	16	17	
21	19	20	21	22	23	24	25	25	16	17	18	19	20	21	22	30	21	22	23	24	25	26	27	34	18	19	20	21	22	23	24	
22	26	27	28	29	30	31		26	23	24	25	26	27	28	29	31	28	29	30	31				35	25	26	27	28	29	30	31	
								27	30																							

September							October							November							December										
Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S	Wk	S	M	T	W	T	F	S
36	1	2	3	4	5	6	7	40		1	2	3	4	5	44						1	2	49	1	2	3	4	5	6	7	
37	8	9	10	11	12	13	14	41	6	7	8	9	10	11	12	45	3	4	5	6	7	8	9	50	8	9	10	11	12	13	14
38	15	16	17	18	19	20	21	42	13	14	15	16	17	18	19	46	10	11	12	13	14	15	16	51	15	16	17	18	19	20	21
39	22	23	24	25	26	27	28	43	20	21	22	23	24	25	26	47	17	18	19	20	21	22	23	52	22	23	24	25	26	27	28
40	29	30						44	27	28	29	30	31			48	24	25	26	27	28	29	30	1	29	30	31				

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## \*Math loophole alert\*

If we only receive one paystub, we can still sometimes verify using the YTD method. Though this method is not exact like the Missing Paystub Calculation is.

### YTD Rules:

- 1.If YTD equals more than what the customer was “claiming” as their amount, we can verify it using YTD.
- 2.We only consider YTD gross too low to use if using YTD method calculates to less than (2) biweekly or (4) weekly ps would be (guesstimating based on what we have received).
- 3.Pay close attention to dates in January and early February. Only one paycheck may be needed for YTD method.
  - a. Ex. RP sends weekly paycheck dated 2/2 for pay period 1/21-1/27. This YTD would include the entire the month of January and IS verifiable.

If you ever need a second opinion, it's always OK to ask in the Income KB Channel.

Income Verification note must include the calculation used to obtain the YTD Gross or missing paystub and that it's only acceptable for PCAP/WARM. 8



## **\*Uber/Lyft/DoorDash/ Instacart/OnlyFans\***

Income type: Salary/Wages

Acceptable POI: Last 30 days of payment summary

Check CSR notes: If note states the HH member just started the job and/or didn't work all weeks this month, you can verify what you received (even if less than 30 days).

Include in your note: Per CSR, HH member  
----- Verified payment summary  
rcvd.

**\*\*Note:** Technically, these customers are self-employed. Therefore, if the monthly statements put them over-income, we need to allow them to provide further documentation with deductions.

If customer is over income with amount provided-include in note customer can send 1040 and schedule C with deductions to determine eligibility.

9



## Some things to know about SS / SSD Benefit letters

1

Ideally, we want the current year's benefit letter. We verify the amount before medicare.

2

Recipients of SS / SSD typically start getting their new year's benefit amount in December of the previous year.

3

SS / SSD letters look exactly the same, you'll need to refer to our systems to determine which it is

4

If you keep scrolling through an SS/SSD letter, you might find an SSI amount at the bottom. So always look through it carefully!



## Social Security (SS) / Social Security Disability (SSD) Benefit Letters- Let's review some examples





### **\*Math loophole alert\***

We prefer to verify the current year's benefit statement for SS / SSD. BUT the yearly increases are standardized, so we can verify the amount with a letter from the previous year.

Example:

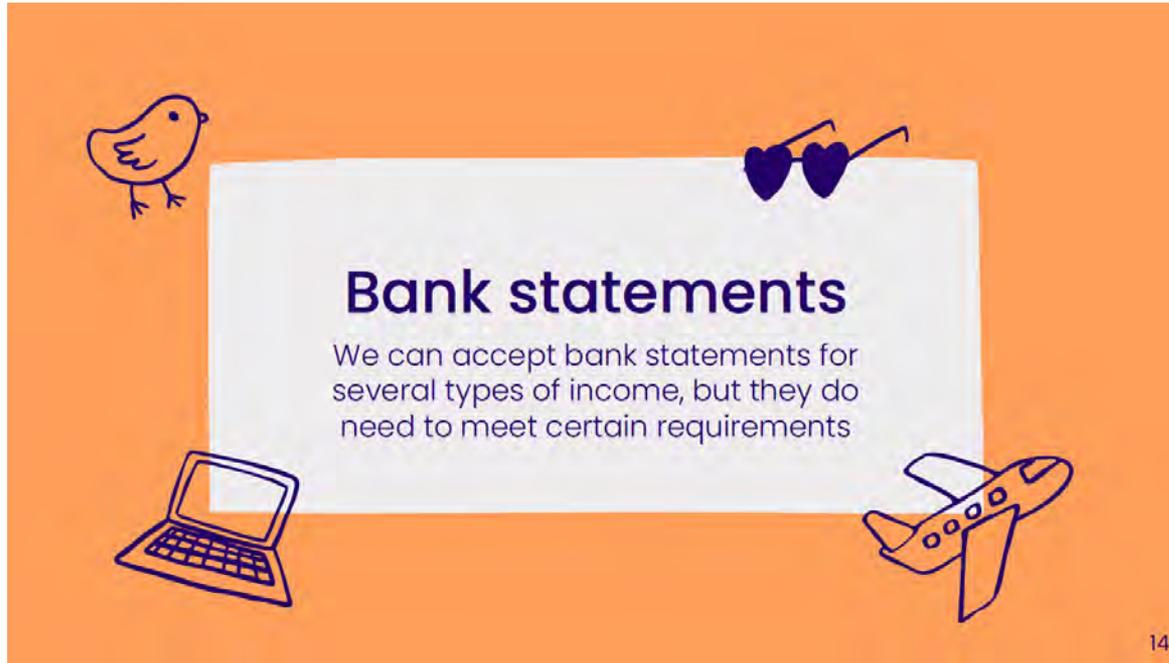
We received the previous year's SS benefit letter. The benefit amount is \$1000 without medicare.

There was a 3.2% increase the following year.

So to get the current amount, we just multiply the previous year's benefit amount by 1.032

$$1000 \times 1.032 = 1032$$

We can only do this for letters from the previous year. If it's two years old (or older) we can't verify.



**Bank statements**

We can accept bank statements for several types of income, but they do need to meet certain requirements

## Some things to know about bank statements

1

We need the bank statement to show the last 30 days of deposits (from when the customer completed their application).

2

We only need to see deposits.

3

Nothing can be blacked out / crossed out / blurred out on the bank statement



## Bank Statements- Let's review some examples





**Self-Employment**

Customers who are self-employed own a business and file a specific tax form.

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## Some things to know about self-employment

1

When a customer claims to be self-employed they can send us the 1040 and the corresponding Schedule. The Schedule provides us with a profit and loss statement for the business as well as any expenses related specifically to that business.

2

We do not take all expenses into consideration. Only expenses that directly affect operations will be counted.

3

For CAP, prior year tax documents will only be accepted until April 1st of the current year. After April 1st, the customer must provide us with the current year's documentation.



## 1040 and Schedule C- Let's review how to calculate



A photograph of a desk setup. On the left is a silver laptop with a black keyboard. To its right is a black smartphone. Below the smartphone are two pens, one silver and one black. To the right of the pens is a pink sticky note. The background is a solid dark purple color.

If applying for a grant, it's best for the customer to send:

- A quarterly statement from accountant, Quickbooks or other online ledger
- Statement from accountant on letterhead

These better represent their last 30 days of income.



## \*Commission Only\*

For those who are self-employed, receiving commission only as their source of income

The preferred option:

- When self-employed, we should advise to send 1040 with Schedule C
- Customer can send 1099
- With the 1099, there is no benefit of the tax deduction, so we prefer the 1040 w/ Schedule C
- We cannot verify a Commission-Only pay stub

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# CHART: CAP/Hardship

*Words in italics are the terms used in the systems for the Income Type.*

Income Type	Acceptable Proof of Income	Grant Exceptions	IS Clarifications
<p><b>Boarders/Roomers</b></p> <p><b>Family member:</b> Include as a household member. Include their gross income they receive.</p> <p><b>Non-family member:</b> Include as a household member. DO NOT include their gross income. Use 50% of the amount they pay for room/board. List that amount as <i>Rental Income</i> under the RP.</p>	<p>For Rental Property, RP can send:</p> <ul style="list-style-type: none"> <li>• Copy of the lease or rental agreement</li> <li>• Copy of a receipt for the rent</li> </ul> <p>Nonfamily member Roomer/boarder should send:</p> <ul style="list-style-type: none"> <li>• Signed letter stating how much they send in rental income per month</li> </ul>		<p>Divide amount on lease, rental agreement or receipt by 2</p> <p>Put the rental income under the ratepayer.</p>
<p><b>Black Lung Benefits</b></p>	<p>Coal mine worker’s compensation of expected benefit statement Bank statement from the last 30 days (last resort)</p>		
<p><b>Cash Assistance</b> <i>Public Assistance</i></p>	<p>Benefits statement (both sides) Printout from DPW website Letter from caseworker on letterhead</p>		<p>CRM verification is good for up to 6 months</p> <p>SNAP benefits/Food Stamps are not counted as income</p>
<p><b>Child/Spousal Support</b></p>	<p>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.GoProgam.com">www.GoProgam.com</a> Bank Statement (last 30 days) Passthrough Welfare: Benefits statement from welfare both sides</p> <p>Voluntary child support or spousal support: Use other income form</p>		<p>Note must specify if child and/or spousal support</p> <p>It is ok to accept PACES screenshots that show “Payee” as long as you can make a reasonable determination for both CAP and grant.</p> <p>The Eppicard system has made some changes, so you may see some new documentation labeled Eppicard or way2go card.</p>

<p><b>Foster Care/Adoption</b></p>	<p>Statement from Social Services Letter from the adoption agency or state or county office stating amount of compensation that will be received Copy of all checks (last 30 days)</p>		<p>If checks are received, review if the amount aligns with what customer put in application/what CSR noted to determine if we received all checks from last 30 days.</p>
<p><b>Investment Income</b>  <i>Interest</i></p>	<p>Dividend Statement Bank Statement showing payment</p>		<p>This is typically a payment they receive for investments (dividends)  Do not count small amounts of checking/savings account interest on bank statements.</p>
<p><b>Long Term or Short-Term Disability</b>  <i>Disability</i></p>	<p>Benefits statement Copy of disability checks/check stubs (last 30 days) Bank statement (last 30 days)</p>		
<p><b>Other Income</b> (includes cash contributions)</p>	<p>Other Income Form</p>		<p>If CSR forgot to verify, verify it.  If you complete the other income form, verify the income.</p>
<p><b>Rental Income</b></p>	<p>Copy of the lease or rental agreement Copy of a receipt for the rent  Verify as rental income. We have a confirmed signed statement from a renter stating they pay RP rental income. This is a verifiable document.</p>		<p>Nonfamily member Roomer/boarder should send a signed letter stating how much they send in rental income per month</p>
<p><b>Retirement Income</b></p>	<p>INCOME IS LISTED AS <b>PENSION</b> AS ALL TYPES IN CRM  <i>Called "Pension", "IRA", "Annuity" / Trust Funds are also treated the same as other retirement income (gets listed and verified as pension)</i>  If Pension: Pension board letter, Copy of pension check with stub attached  Copy of 1099 Copy of Form 5498 for Roth IRA Copy of pension check with stub attached Bank statement from current year</p>		<p>Pension Board letter is typically only received once. We can accept pension board letters from previous years.  1099's must be from the previous year  <ul style="list-style-type: none"> <li>• Until April, 1099 acceptable from previous two years because they may not have received their new 1099</li> </ul> <p>Check stubs can be from the current year  CRM verification is good for the rest of the year.</p> </p>

			<p>Only counted if received on a monthly basis</p> <ul style="list-style-type: none"> <li>Ask: Are you receiving retirement payments on a monthly basis?</li> </ul>
<b>Royalties</b>	<p>Monthly Royalty Statement Copy of royalty check (last 30 days) Bank Statement (last 30 days) Other Income Form (last resort)</p>		
<b>Salary &amp; Wages (Employment)</b>	<p><b>Note:</b> Bank statements, screenshots or any other format that shows <u>net</u> only are NOT acceptable.</p> <p>Paystubs for the last 30 days Letter from employer Handwritten Paystubs? Complete other income form</p> <p>School teachers/bus drivers for school for CAP: Advise to send last paystubs received (We will calculate YTD method).</p> <p>Other seasonal workers, laid off, for CAP: If not receiving UEC, treat as 0 income</p> <p>Uber/Lyft/DoorDash/Instacart/ETC: Last 30 days of payment summary</p> <p>Military Pay: Military LES (Leave &amp; Earnings Statement) from last 30 days</p> <p><b>17-year-old and younger/18-year-old still in high school: Wages are not counted as income for any program including Hardship. Do not verify salary/wages for minors, enter as Zero Income.</b></p>	<p>Seasonal/school employee: Only request income received in last 30 days if applying for only a grant</p> <p>1099 is not acceptable</p> <p>YTD calculation is not acceptable for grant- the last 30 days POI is required.</p>	<p>If missing one paystub from the last 30 days, try to use the missing paycheck method. Acceptable for CAP and Grants.</p> <p>If customer has an unusually high income on last paycheck causing them to be over income, they will need YTD method: See <a href="#">12 Month Income</a></p> <p>If customer does not send a full 30 days or is a seasonal employee, calculate using YTD. Acceptable POI for CAP only.</p> <p><b>There is no need to do YTD if customer sends all required paystubs, even if one is for \$0. Verify as usual. \$0 paystubs are acceptable for CAP/WARM and Hardship.</b></p> <p>If it's a new job, review the CSR notes to see if it states we are expecting to see less than 30 days' worth of paystubs for a grant. If the note documentation aligns, verify it. Acceptable POI for grant only. Put in note additional paystub needed for CAP.</p>

			<p>If 1099 is received for a subcontractor, use the <i>subcontractor</i> income type in the systems</p> <p>Military Pay: See <a href="#">Military PS</a></p> <p>For school teachers and bus drivers for school for CAP- Advised to send last paycheck received for YTD. [Grants use last 30 days so use zero income if applying during the summer].</p>
<p><b>Self-Employment</b> (Includes <i>subcontractors</i>)</p>	<p>Quarterly statement from accountant QuickBooks or other type of online ledger Statement from Accountant on letterhead stating the income from the last 30 days Tax Return 1040 and schedule C Copy of 1099 If in partnership, Schedule K1 &amp; Schedule E Other Income Form (last resort)</p> <p>Subcontractor: 1099 for previous tax year is acceptable if they don't have paystubs</p> <p>Commission Only: Treated as Self-employment. Must send 1040 or 1099 from previous year.</p>	<p>1040 and Schedule C from previous year can only be accepted up to 30 days after filing date of the current year</p> <p>1099 from previous year can only be accepted up to 30 days after filing date of current year. (Keep in mind, customer will not receive the benefit of the gross amount reflecting deductions)</p>	<p>For CAP, deduct the following lines on the Schedule C: Start with Line 7 8. advertising 10 commissions and fees 11 contract labor 12 Depletion 14 employee benefit programs 17 legal and professional fees 18 office expense 22 supplies 25 utilities 26 wages Divide by 12</p> <p>For grant (if received during tax season) , start with line 7 and divide by 12 for the amount to verify. No deductions taken.</p> <p>1040 and 1099 are acceptable for CAP when it is outside of the tax filing season, but not grant.</p> <p>Follow guidance in Teams Knowledgebase on other Schedules.</p> <p>For Commission- Only: See <a href="#">Commission-Only</a></p>

<p><b>Social Security</b></p> <p><i>Social Security</i> <i>SS Disability</i> <i>SSI</i> Survivor Benefits list under <i>Social Security</i></p>	<p>Social Security Benefit Statement (also called award letter) Current year or previous year w/increase factored in.</p> <p><a href="http://www.socialsecurity.gov/myaccount">www.socialsecurity.gov/myaccount</a> or call 1-800-772-1213</p> <p>Bank Statement Letter from bank on letterhead confirming direct deposits Copy of 1099 from previous year</p> <p><b>SSI State Supplement of \$22.10 or less-</b> No verification needed</p>		<p>CRM verification is good for the rest of the year.</p> <p>Bank Statement</p> <ul style="list-style-type: none"> <li>SSA, SSD, &amp;SSP- can be from the CURRENT year. It does not have to be from the last 30 days. As long as bank statement shows all deposits for that month, it is verifiable.</li> <li>SSI- must be from the past month.</li> </ul> <p><b>We cannot accept a previous year's letter or a 1099 for SSI, only for SSA/SSD.</b></p> <ul style="list-style-type: none"> <li><u>Exception:</u> If an elderly (62+) customer reports <b>SSI only (no other SS)</b> and sends proof from the previous year, you can add the increase from the current year and verify this income.</li> </ul> <p>You can verify the net amount after all deductions (except tax withholdings)</p> <p><b>SSI State Supplement of \$22.10 or less: If POI is received, it needs to be verified.</b></p> <ul style="list-style-type: none"> <li>DPA benefits printout, SSP letter, bank stmt</li> <li>Verify in CRM as Public Assistance</li> <li>Add to SSI total in OSCAR and/or MyApp.</li> <li>Only add to PBA and Oscar for FE if</li> </ul>
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			we have documented POI
<b>Stipends</b>	1099/W2/Letter stating the pay frequency and amount of payment  We do not consider loans and scholarships paid to the institution as income.		<b>DO NOT</b> complete an "Other Income" Form. Proof of Income is needed.  For now, Stipends must be entered as "Salary and Wages" until further notice.  Take the amount of the stipend received for the semester and divide by 5 to get the monthly amount.  We consider any stipend for living expenses received as income.
<b>Unemployment Compensation</b>	Notice of financial determination Unemployment printout – <a href="http://www.uc.pa.gov">www.uc.pa.gov</a> Bank statement from last 30 days		
<b>Utility Checks</b>	Copy of utility check If reimbursed on a card, printout from the card (last 30 days) Document from housing that lists the utility reimbursement		
<b>Veterans Benefits</b> <i>Veteran's Income</i>	Letter from VA Benefit statement (current year) Bank Statement from last 30 days  <b>Note:</b> Veterans benefits / income is either pension or disability. Both are fixed income.		Verify in CRM under Veteran's Income
<b>Workman's Compensation</b> <i>Worker's Comp</i>	Letter of determination Benefits statement from last 30 days Copy of checks (last 30 days) Bank statement from last 30 days		
<b>Zero Income</b>	Zero Income Form	Hardship always looks at last 30 days.  If income has been received in last 30 days and customer is applying for a grant document/request POI.	

**NOTES:**

- Emailed receipts confirming deposits to a bank account are unacceptable as POI
- Pre-paid debit/credit card statements showing direct deposits from valid sources (Social Security, Department of Public Assistance, etc.) are acceptable in lieu of a bank statement
- **Proof of loss of income for wages, social security, unemployment, etc. is NOT required for any program. If a customer contacts us and says they are now Zero Income, we can proceed with a CAP application immediately. Grants do require the last 30 days POI.**

## Children's Income Chart

Use the following chart to determine whether Children's Income should be included in CRM, MyApp and OSCAR:

	CRM	MyApp	OSCAR	Additional Notes:
FE	Yes	Yes	No	<p>*Children's Income is included for Grant purposes only, except for salary/wages.</p> <p>**17 or younger / above 17 and still in high school: Do NOT include Income for PCAP.</p>

## How long is verified income good for?

This can vary depending on the income type but not the program. All programs (CAP and hardship) look at this the same way.

For most income types including but not limited to employment, unemployment, and child/spousal support, the income verification is good for 30 days. Once it goes past 30 days, the customer would need to send in updated proof of income in order to apply/recertify for our programs.

**The following income is good for the rest of the year after it's verified:**

- SS Benefits
- SSD Benefits
- SSI Benefits (keep in mind, SSI can change so if a customer sends in updated proof that shows a different amount, verify it)
- VA Benefits
- Pension
- Self-Employment (only if tax documents were verified and is good through April 1st of the following tax year)

**The following income is good for 6 months after it's verified:**

- Cash Assistance verified under Public Assistance

## Duplicate POI/Multiple Forms of POI

### **Duplicate POI:**

- You only need to notate duplicate POI received in CRM. You do need to check notes/recent activity for the utility you are working and move pending codes appropriately/leave notes (if not done by previous IS).
- Always use Income Verification Duplicate if someone else used the Income Verification code for the same exact income, even if you need to update a different OSCAR.
- Example: RP sends income for FE, then sends it a day later for Columbia.

For the income types that verification is good for 6 or 12 months:

- If it's already been verified this year and you receive duplicate income (same SS ltr, same pension letter, same 2021 taxes, etc.), this is duplicate income. Do not reverify. Mark as a duplicate in CRM. You do need to check notes/recent activity for the utility you are working and move pending codes appropriately/leave notes (if not done by previous IS).
  - We don't want you having to pull up the old income in Docuware. If it's not noted what was received in the previous income verification note, go ahead and verify it as normal.
- If it's already been verified this year but you receive different income (previously a bank statement was received but now you have the SS ltr), this is not duplicate income. You can verify it (even if the amount is the same). Check notes/recent

activity for the utility you are working and move pending codes appropriately/leave notes.

In general: The income charts are set up to show priority for documentation.

### 2024 FPIG Chart (monthly):

2024 Monthly Federal Poverty Guidelines

# in Household	135%	150%	200%	250%	300%
1	\$1,684.25	\$1,882.50	\$2,510.01	\$3,137.51	\$3,765.01
2	\$2,299.50	\$2,555.01	\$3,406.68	\$4,258.34	\$5,110.01
3	\$2,904.75	\$3,227.51	\$4,303.33	\$5,379.18	\$6,455.01
4	\$3,510.00	\$3,900.01	\$5,200.01	\$6,500.01	\$7,800.01
5	\$4,115.25	\$4,572.51	\$6,096.68	\$7,620.84	\$9,145.01
6	\$4,720.50	\$5,245.01	\$6,993.34	\$8,741.68	\$10,490.01
7	\$5,325.75	\$5,917.51	\$7,890.01	\$9,862.51	\$11,835.01
8	\$5,931.00	\$6,590.01	\$8,786.68	\$10,983.34	\$13,180.01
Plus one	\$605.25	\$672.50	\$896.67	\$1,120.83	\$1,345.00

## Making Reasonable Determinations

**If we can determine the CRM/MyApp/OSCAR/iPartner records that a document belongs to, then we don't need to have the name printed on the income document(s) received for the CAP and Hardship programs. We can make a reasonable determination about the document.**

Examples:

- Customer uploads income using MyDocs and it comes into Docuware in an “indexed” status. We receive 2 biweekly paystubs with recent pay dates but the paystubs only have an employee number, no name. The OSCAR or MyApp Application shows employment income. This is ok to verify.
- Customer sends an email. They include their name and account number in the subject line of the email. They attach their social security letter but cut off the name at the top. This is ok to verify since they included their name on the subject of the email and the OSCAR or MyApp application shows SS income.
- Customer sends one email with multiple attachments. They don't include anything in subject line of email. RP has a job but also collects unemployment when they don't have work for the week. This is documented in CRM/OSCAR. We receive 2 biweekly paystubs with the RP's name

clearly visible. We also receive a UEC website printout showing the last 30 days of payments but no name is listed. This is ok to verify because the other documentation has the name listed and this was all sent as part of the same email.

- Two HH members receive salary/wages. The MyApp online application indicates that the wife receives \$800 and the husband receives \$200. We receive approximately \$800 in biweekly paystubs (no name) and \$200 in an uber printout (no name). This is ok to verify.

This is not an inclusive list of scenarios as there are many that could come up. Just keep in mind, it's about making a reasonable determination and then documenting your findings. Your note will help us to understand the actions that you took.

**In your Income Verification task, be sure to include:**

- What you received for each HH member
- If the name was missing, be sure to note that next to the income for that HH member

Examples of income notes:

- *Rcvd 2021 SS letter via application-import with the top portion cut off for Julie Test, SP. Name is not on letter but made a reasonable determination.*
- *Rcvd 2 biweekly paystubs showing only an employee number (no name) for RP Julie Test. RP sent through email and included their name/account number.*

## Income Verification Notes: Best Practices

<b>Best practices for notes:</b>	
<b>Accurate Notes:</b>	Accurately explain the income we received and/or specific additional information still needed. <ul style="list-style-type: none"> <li>• <b>Temporary:</b> If you received a paper application, be sure to include this in your notes.</li> </ul>
<b>Dates:</b>	Must include dates of all income received for all income types (not just what was used) <ul style="list-style-type: none"> <li>• Specify which dates you did not use and which ones you did use.</li> <li>• If RP is paid monthly, note that.</li> </ul>
<b>Amounts:</b>	List the amount of each piece of POI (not just what was used). How many documents received (# of copies of a given document) as well as dollar income amount on each document (not just what was used but everything received).

	<b>EXCEPTION:</b> This level of detail is only needed for income in Docuware. For income found in PBA only, you can use less detail since it is all attached to the record. Example: Received 6 paychecks only used 2/2 \$850 and 2/16 \$812																		
<b>Types:</b>	What type of documentation did you verify (ps, 2022 ss awd ltr, etc.)																		
<b>Calculations:</b>	If calculating income using YTD, missing paystub, or SS/SSD yearly increase, be sure to show your calculation in notes.																		
<b>Income is only acceptable for CAP?</b>	Note this																		
<b>Child's income</b>	<b>Not Received:</b> Include in note: Child's income not received-needed if applying for grant (or needed for Columbia/OPPD CAP)  <b>Received:</b> Include in note: Child's income needed for grant only but not needed for CAP unless customer has Columbia or OPPD																		
Your note <b>does not</b> need to include:	<ul style="list-style-type: none"> <li>• what the customer is applying for</li> <li>• program acronyms</li> <li>• the RP name/account number</li> </ul>																		
<b>Examples:</b>																			
rcvd rp 2021 SSA-1099 with Pd by Chk/Dir Dep = \$14,916 / 12 = \$1243 * 1.059% (incr for 2022) = \$1316.34 rcvd minor ch 2021 SSA-1099 with Pd by Chk/Dir Dep = \$14,916 / 12 = \$1243 * 1.059% (incr for 2022) = \$1316.34  Dalton - Child - Social Security - \$1,316.00 Jancie - Self - Social Security - \$1,316.00	Rcvd (2) biweekly ps - 4/9 \$1,000 and 4/23 \$1,307  Melissa - Self - Salary/Wages - \$2,307.00																		
Rcvd 2024 SS award letter Nagy - Self - SS Disability - \$1,238.00	rcvd screenshots of rp DoorDash pays and tips: <table border="1"> <thead> <tr> <th>DATE</th> <th>PAY</th> <th>TIPS</th> </tr> </thead> <tbody> <tr> <td>11/07</td> <td>\$56.50</td> <td>\$72.00</td> </tr> <tr> <td>11/14</td> <td>\$142.25</td> <td>\$154.12</td> </tr> <tr> <td>11/21</td> <td>\$131.25</td> <td>\$118.76</td> </tr> <tr> <td>11/28</td> <td>\$0.00</td> <td>\$0.00</td> </tr> <tr> <td><b>TOTALS:</b></td> <td><b>\$330.00</b></td> <td><b>\$344.88</b></td> </tr> </tbody> </table> Skyler - Self - Other - \$344.00 Skyler - Self - Salary/Wages - \$330.00	DATE	PAY	TIPS	11/07	\$56.50	\$72.00	11/14	\$142.25	\$154.12	11/21	\$131.25	\$118.76	11/28	\$0.00	\$0.00	<b>TOTALS:</b>	<b>\$330.00</b>	<b>\$344.88</b>
DATE	PAY	TIPS																	
11/07	\$56.50	\$72.00																	
11/14	\$142.25	\$154.12																	
11/21	\$131.25	\$118.76																	
11/28	\$0.00	\$0.00																	
<b>TOTALS:</b>	<b>\$330.00</b>	<b>\$344.88</b>																	

## Pending Codes

MyApp-FE	
Income Received	All income is received and fully verified (even if over income)
Unacceptable Income Reminder: Only use Unacceptable Income	Partial, net, blurry, unacceptable income received. Choose reason code: <ul style="list-style-type: none"><li data-bbox="641 1858 966 1892">• Date of income too old</li></ul>

<p>if the income cannot be verified for any programs. If the income is verifiable for CAP or CAP/Grant, then always use Income Received and put what income can be used for in note.</p>	<ul style="list-style-type: none"> <li>• Income not received for everyone in your household</li> <li>• Not the gross income</li> <li>• Picture of income did not include the complete page: Use for partial, blurry, name not on doc, etc.</li> <li>• <b>NOTE: If you do not see a reason code that fits the reason income is unacceptable, choose the closest one, and leave details in your notes explaining why income was not acceptable.</b></li> </ul>
--	--

NOTES:

- **If you work a record that is in Incomplete Application or Incomplete Application-Email Sent:**
  - Look at the audit trail.
    - If the record was moved from Waiting for Income-Email Sent or Unacceptable Income-Email Sent to Incomplete Application, you may move the record when you verify income.
    - If the record was moved by a CSR or admin because we did not have a payment, LL information, DOB or SS, you will leave in Incomplete Application or Incomplete Application-Email Sent.
- **If you come across 2 records for the same customer (same utility) in MyApp or any OSCAR system include in your note:**
  - There are 2 records for this RP in (name of SYSTEM).

## FE- Pending codes- Do not move!

Failed to Agree

Duplicate Application

Ready for Oscar Entry

Hardship App Complete

CAP App Complete

\*Not Enrolled-- can be worked if the customer does not have an OSCAR Record

- Note: if recently moved here due to not receiving income, then income is received (and there is no Oscar or Oscar is a state that does not need moved), work MyApp and move to Income received

Ready for iPartner

Ineligible

- Bad account number
- Bill not in name
- Finaled account
- Wrong utility
- Non-residential account

## Indexing

### Indexing in Docuware: Last Names

- Because income can now be viewed in any OSCAR or MyApp system, it's important the last name matches these systems when indexing in Docuware.

- Index under the customer last name in OSCAR or MyApp for the utility you are working.
  - If the **notes state the customer is only applying for a grant, then index under Hardship PA.**
- If they are in both OSCAR and MyApp for that same utility but with different last names, use the last name in MyApp.
- If customer has a hyphenated last name in OSCAR/MyApp, index using the hyphenated last name.
  - **Exception:** If the last name is spelled incorrectly in OSCAR or MyApp, do not index the document with incorrect spelling. Add to your note: Name spelled incorrectly in MyApp/OSCAR

### Indexing in Docuware: ZIP CODES

- When we index in Docuware, we must index under the mailing address zip code. We need to make sure this zip code is the same in CRM, MyApp, and OSCAR (any of the systems the customer is in).
- NOTE: If the zip codes do not match in all these systems (just for the program you are working), reach out to the Income Specialists chat in Teams.

### Indexing in Docuware: Unmatched Income

After claiming the document and sending your unmatched email to All-CSR:

- Fill out the last name section with the RP's last name (if known) or the last name on the doc (if RP's name is unknown)
- Fill out the SS if known – Otherwise, use 1111
- Fill out the zip code if known – Otherwise, leave blank
- Change the Program to Pending
- Leave the status as repair
- Change the Fax Line to Unclassified
- Click Save

A screenshot of a DocuWare document metadata form. The form contains the following fields:

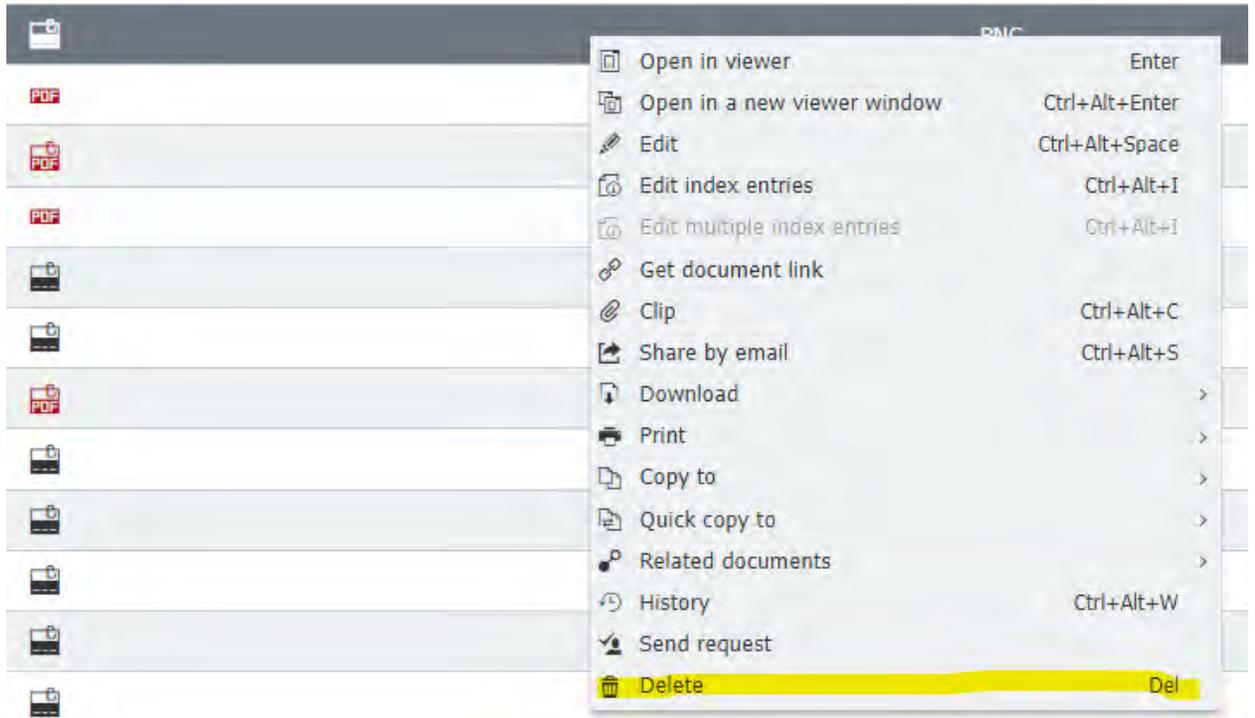
- Last Name: [Redacted]
- Last 4 of SS: 1111
- Zip Code: [Redacted]
- Program Name: Pending
- Status: Repair
- Date: 01/05/2023 3:44 PM
- Fax Line: Unclassified
- Claimed By: [Redacted]
- Last Modified By: mhontz

### No Identifiable Marks / Blank Document

If you have determined the document to be “Unmatched” and there are no identifiable marks on it or in the subject, the document will need to be deleted from DocuWare.

#### If you open a document and see that it is blank:

- Close the documents
- Right click anywhere on the line on the document
- The following toolbar will appear. Select Delete.



**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 14**

“How many LIURP jobs did FE PA complete for its customers from 2019 to present, disaggregated by year?”

**RESPONSE:**

See FE PA Response to Cause-PA Interrogatory Set II, No. 14, Attachment A.

Jobs Completed						
Rate District	2019	2020	2021	2022	2023	2024
Met-Ed	1,617	1,109	1,269	937	1,027	309
Penelec	2,541	1,324	1,953	1,689	1,916	545
Penn Power	1,011	570	695	613	484	157
West Penn Power	1,255	1,002	1,201	961	1,047	417
Totals	6,424	4,005	5,118	4,200	4,474	1,428

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 16**

“Please provide FE PA’s most recent LIURP needs assessment approved by the Pennsylvania Utility Commission. In addition, if FE PA has prepared and submitted a needs assessment that has not yet been approved, please provide a copy of this needs assessment.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Set II, No. 013, Attachment A at page 30, for the LIURP needs assessment filed by the FE PA through its predecessor operating companies.

See CAUSE-PA Set II, No. 016, Attachment A for the WARM Needs Assessment Clarification chart provided at the request of the PUC in April 2023 as supplemental information for the 2024-2028 USECP.

The following Needs Assessment information was filed and approved by the PUC for the 2024-2028 USECP. The WARM Needs Assessment Clarification chart was provided at the request of the PUC in April 2023.

Universal Service Needs Assessments

**2021 Needs Assessment - Met-Ed**

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 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	39,628	7,323	18.48%	30,629	5,660	
Berks	156,389	38,721	24.76%	130,035	32,197	
Bucks	240,763	29,964	12.45%	5,190	646	
Chester	192,951	27,370	14.18%	1,150	163	
Cumberland	101,176	16,896	16.70%	10,739	1,793	
Dauphin	113,759	27,277	23.98%	5,886	1,411	
Lancaster	204,003	43,224	21.19%	1,986	421	
Lebanon	53,857	12,354	22.94%	53,549	12,284	
Lehigh	140,072	36,308	25.92%	3,749	972	
Monroe	59,950	13,915	23.21%	21,646	5,024	
Montgomery	318,648	41,675	13.08%	11,690	1,529	
Northampton	115,300	22,376	19.41%	60,283	11,701	
Pike	22,717	4,365	19.21%	15,674	3,011	
York	174,425	34,979	20.05%	161,537	32,388	
<b>Total</b>	<b>1,933,638</b>	<b>356,747</b>	<b>18.45%</b>	<b>513,743</b>	<b>109,200</b>	<b>21.256%</b>

2021 Needs Assessment - Penelec

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 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	28,035	7,272	25.94%	99	26	
Bedford	19,930	5,597	28.08%	10,159	2,853	
Blair	51,647	14,755	28.57%	48,867	13,961	
Bradford	25,084	7,186	28.65%	19,753	5,659	
Cambria	56,933	16,547	29.06%	55,048	15,997	
Centre	59,380	18,070	30.43%	4,483	1,364	
Clarion	15,930	5,347	33.57%	4,967	1,667	
Clearfield	31,704	9,616	30.33%	29,890	9,066	
Crawford	35,169	10,586	30.10%	22,361	6,731	
Cumberland	101,176	16,896	16.70%	5,311	887	
Erie	110,388	34,239	31.02%	107,396	33,314	
Forest	2,131	632	29.66%	3,459	1,026	
Franklin	61,617	14,456	23.46%	5,129	1,203	
Huntington	16,779	4,116	24.53%	11,585	2,842	
Indiana	33,855	11,358	33.55%	22,734	7,627	
Jefferson	18,400	5,510	29.95%	14,203	4,254	
Juniata	9,380	2,474	26.38%	726	192	
Lycoming	46,160	12,403	26.87%	727	195	
McKean	17,059	5,598	32.82%	14,128	4,637	
Mifflin	19,075	5,808	30.45%	19,517	5,943	
Perry	18,512	3,850	20.80%	990	206	
Potter	6,630	2,083	31.42%	2,521	792	
Somerset	29,518	7,511	25.45%	26,610	6,772	
Sullivan	2,751	674	24.50%	2,899	710	
Susquehanna	17,027	4,386	25.76%	11,811	3,043	
Tioga	16,442	4,803	29.21%	10,597	3,095	
Venango	22,103	6,399	28.95%	18,657	5,401	
Warren	17,124	4,744	27.70%	14,886	4,123	
Wayne	18,938	4,862	25.67%	3,080	791	
Westmoreland	153,772	31,940	20.77%	1,992	414	
Wyoming	10,887	2,381	21.87%	7,055	1,543	
<b>Total</b>	<b>1,073,536</b>	<b>282,099</b>	<b>26.28%</b>	<b>501,640</b>	<b>146,334</b>	<b>29.171%</b>

**2021 Needs Assessment - Penn Power**

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau

December 2021 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
Allegheny	545,695	122,398	22.43%	20,482	4,594	
Beaver	72,086	16,123	22.37%	11,627	2,601	
Butler	77,725	13,883	17.86%	30,766	5,495	
Crawford	35,169	10,586	30.10%	6,358	1,914	
Lawrence	37,300	10,558	28.31%	33,652	9,527	
Mercer	46,821	13,013	27.79%	45,767	12,719	
Venango	22,103	6,399	28.95%	20	6	
<b>Total</b>	<b>836,899</b>	<b>192,960</b>	<b>23.06%</b>	<b>148,672</b>	<b>34,284</b>	<b>23.060%</b>

**2021 Needs Assessment - West Penn Power**

Based on:

Source: 2016-2020 American Community Survey 5-Year Estimates - United States Census Bureau  
December 2021 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	39,628	7,323	18.48%	1,597	295	
Allegheny	545,695	122,398	22.43%	71,498	16,037	
Armstrong	28,035	7,272	25.94%	29,662	7,694	
Bedford	19,930	5,597	28.08%	4,130	1,160	
Blair	51,647	14,755	28.57%	19	5	
Butler	77,725	13,883	17.86%	44,613	7,968	
Cameron	2,334	797	34.15%	3,476	1,187	
Centre	59,380	18,070	30.43%	55,092	16,764	
Clarion	15,930	5,347	33.57%	8,917	2,993	
Clinton	15,058	4,705	31.25%	2,598	812	
Elk	14,215	3,365	23.67%	16,180	3,830	
Fayette	55,346	17,679	31.94%	61,174	19,539	
Franklin	61,617	14,456	23.46%	48,825	11,454	
Fulton	6,040	1,429	23.66%	5,232	1,238	
Greene	14,503	3,898	26.88%	16,113	4,331	
Huntingdon	16,779	4,116	24.53%	53	13	
Indiana	33,855	11,358	33.55%	1,339	449	
Jefferson	18,400	5,510	29.95%	43	13	
Lycoming	46,160	12,403	26.87%	494	133	
McKean	17,059	5,598	32.82%	4,406	1,446	
Potter	6,630	2,083	31.42%	2,556	803	
Somerset	29,518	7,511	25.45%	243	62	
Washington	85,201	17,193	20.18%	94,379	19,046	
Westmoreland	153,772	31,940	20.77%	160,294	33,293	
<b>Total</b>	<b>1,414,457</b>	<b>338,686</b>	<b>23.94%</b>	<b>632,933</b>	<b>150,565</b>	<b>23.788%</b>

FirstEnergy 2024-2028 USECP WARM Needs Assessment Clarification - April 2023				
	Met-Ed	Penelec	Penn Power	West Penn Power
<b>Number of Customers with Incomes at or Below 150% of</b>	109,200	146,334	34,284	150,565
Usage at or Above 6,500 kWh per Year	88,452	88,532	21,942	126,023
Received WARM in the Last Five Years	5,545	8,800	3,264	4,716
Less than Six Months of Usage History	1,520	1,467	327	1,238
Renters Projected where LL Refused	1,265	916	313	650
Projected to Drop Out	3,362	4,365	1,588	1,251
Number of Customers Receiving Services - Act 129	349	411	34	1,671
Total Potential Participants	76,411	72,573	16,416	116,497
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 389,741,946.60	\$ 214,525,788.00	\$ 66,109,366.08	\$ 722,509,734.12
Estimated Renters	74,243	43,577	9,467	57,316
<b>Number of Customers with Incomes 151-200% of FPIG</b>	48,355	57,086	14,856	60,818
Usage at or Above 6,500 kWh per Year	39,168	34,537	9,508	50,905
Received WARM in the Last Five Years	1,259	1,099	437	711
Less than Six Months of Usage History	673	572	142	500
Renters Projected where LL Refused	942	714	127	222
Projected to Drop Out	763	545	212	189
Total Potential Participants	35,531	31,607	8,590	49,283
Weighted Average Job Cost for 2022	\$ 5,100.60	\$ 2,956.00	\$ 4,027.13	\$ 6,201.96
Estimated Cost to Serve Potential Participants	\$ 181,230,057.80	\$ 93,431,000.45	\$ 34,593,008.16	\$ 305,651,194.68
Estimated Renters	25,421	13,560	3,844	19,579
<p>Note: The weighted average job costs used to estimate the cost to serve potential participants do not include administration, field support or inspection costs.</p> <p>It is not known if a job will be deferred due to health and safety issues until a home audit takes place. Therefore, no data on deferrals is presented here. However, the Companies have prepared a separate spreadsheet with data on deferrals.</p> <p>The original submitted WARM needs assessment excluded all homes that had previously been a part of WARM and did not estimate how many customers with incomes from 151-200% of FPIG might qualify for WARM.</p> <p>Submitted to Pennsylvania Utility Commission as part of USECP 2024-2028 Filing</p>				

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set II, No. 22**

“According to the most recent data available, what was the average residential bill savings per FE PA LIURP jobs for each year since 2019, disaggregated by year, as of the last day of the year? If available, please additionally disaggregate this response by Rate District. Please provide copies of any studies, reports, or other documents relied upon for this calculation.”

**RESPONSE:**

See FE PA Response to CAUSE-PA Interrogatory Set II, No. 022, Attachment A for the average annual residential bill savings per FE PA LIURP jobs.

See FE PA Response to OCA Interrogatory Set I, No.1, Attachment S, T, and U for LIURP annual reports containing the calculations.

Average Residential Bill Savings Per FE PA LIURP Jobs

2019	Space Heat	Water Heat	Baseload
Met-Ed	\$223.23	\$198.24	\$100.72
Penelec	\$238.99	\$189.56	\$111.62
Penn Power	\$326.04	\$60.93	\$112.55
West Penn Power	\$202.06	\$173.18	\$103.09

2020	Space Heat	Water Heat	Baseload
Met-Ed	\$319.94	\$153.27	\$77.93
Penelec	\$174.24	\$129.66	\$86.79
Penn Power	\$288.31	\$34.23	\$28.15
West Penn Power	\$241.59	\$122.32	\$68.96

2021	Space Heat	Water Heat	Baseload
Met-Ed	\$94.57	\$255.93	\$94.44
Penelec	\$139.44	\$70.90	\$74.39
Penn Power	\$150.19	\$93.35	\$63.96
West Penn Power	\$198.66	\$111.49	\$82.50

**Job Type Descriptions**

Space Heat : Primarily heat source is electric, may or may not have electric water heater

Water Heat : Electric hot water heater

Baseload Jobs: No electric heat or electric hot water heater

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 1**

“Please provide a copy of the following FE PA documents, as of the most current version available:

- A. All notices of involuntary service termination for residential customers, including FE PA’s 3-day shut off notice(s) for residential customers, 48-hour shut off notice(s) for residential customers; and 10 day shut-off notice(s) for residential customers;
- B. Post-Termination Notice(s) for residential Customers;
- C. All notices provided to tenants related to involuntary termination or discontinuance of service;
- D. All notices provided to tenants related to rights under the Discontinuance of Service to Leased Premises Act (DSLPA), including FE PA’s 30-Day shut off notice to tenants;
- E. All notices provided to landlord ratepayers related to rights under the Discontinuance of Service to Leased Premises Act (DSLPA), including FE PA’s 37-Day Shut off notice to Landlord ratepayers;

For each document provided in response to this interrogatory, please specifically identify whether the document is provided in Spanish or a language other than English (please specify which language(s)), and provide a copy of the translated document(s). Please also indicate under what circumstances FE provides translated versions of each of these documents.”

**RESPONSE:**

- A. See FE PA Response to Cause-PA Interrogatory Set III, No. 1, Attachments A, B, C, and H-W.
- B. See FE PA Response to Cause-PA Interrogatory Set III, No. 1, Attachment D.
- C.-D. See FE PA Response to Cause-PA Interrogatory Set III, No. 1, Attachments E and F.
- E. See FE PA Response to Cause-PA Interrogatory Set III, No. 1, Attachment G.

FE PA Response to Cause-PA Interrogatory Set III, No. 1, Attachment D is fully translated on pages 4-6 of the attachment.

FE PA Response to Cause-PA Interrogatory Set III, No. 1 Attachments A, B, C, E, and F have limited Spanish communication embedded in the English version.

The translated version of all attached documents can be verbally communicated in any language via use of our interpreter service when a customer contacts our care center.



Met-Ed  
P.O. Box 3687  
Akron, OH 44309-3687

**3 DAY SHUT-OFF NOTICE  
AVISO DE SUSPENSION DE SERVICIO**

Toll Free Number:  
1-800-962-4848

Ratepayer: [REDACTED]  
[REDACTED]  
READING PA 19606

Date: 07/25/2023 Time: \_\_\_\_:\_\_\_\_

Account Number: [REDACTED]

\$1,900.69	Past-Due Amount
\$0.00	Security Deposit
\$36.00	Reconnection Charge
	If Terminated
\$1,936.69	Total Amount Due
	If Terminated

If we shut off your electric service, you may have to pay all of the above before we can turn your service on.

**Your Electric Service May Be Shut Off !**

Because your bill is past-due, we will shut off the service to:

[REDACTED] READING PA 19606

on or after 8 a.m. on \_\_\_\_\_.

**We will NOT Shut off your electric service if you do ONE of the following:**

1. Call us at 1-800-962-4848 to arrange to pay your past-due bill of \$ 1,900.69 .
2. Pay the amount you owe on your payment arrangement. Call us at 1-800-962-4848 for this amount.
3. Show us a paid receipt for the past-due amount.
4. Call 1-800-962-4848 right away if you dispute this bill or to provide us with household income and occupant information. You may be eligible for a payment arrangement or special assistance programs.

To talk about your bill, please call our office at 1-800-962-4848

**MEDICAL EMERGENCY NOTICE**

Let us know if someone living in your home is seriously ill or has a medical condition. **WE WILL NOT SHUT OFF YOUR SERVICE** provided you:

1. Have your licensed physician, nurse practitioner, or physician assistant certify in writing that you or a member of your household is seriously ill or have been diagnosed with a medical condition which requires the continuation of service to treat the medical condition.  
AND
2. Make some equitable arrangement to pay the company your current bills for service.

**IMPORTANT TO KNOW**

Before we shut off your utility service please read the next page of this notice. You may be eligible for certain protections from shut-off.

Atencion ! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 1-800-962-4848.

**IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE**

- If you have questions about the 10 day notice you previously received, have any other questions, or need more information please call us today at 1-800-962-4848. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut-off if you file the complaint before the shut-off date. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
- If you currently have a valid Protection From Abuse Order or a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against you, your service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. Call us immediately at 1-800-962-4848. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment arrangement or special assistance programs. Call 1-800-962-4848 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- Having trouble paying your electric bill? Help is available! Please visit [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) and click on "Search Assistance Programs" to find out if you qualify. You may also call 211 for utility assistance.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 1-800-962-4848.
- If you have trouble understanding or speaking English or have a disability please call us at 1-800-962-4848 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past-due.
- All adult occupants of the premises whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premises may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.
- After all conditions have been met to have the service turned back on, it may take up to three days to have your service restored. Please contact us to discuss the details.
- **With the Pennsylvania Public Utility Commission's approval, we are notifying all customers of a change in the procedure for disconnection for nonpayment. The company representative will now attempt to complete a remote disconnection and may no longer need access to the meter. All other regulatory noticing leading up to disconnect will continue with no change, and a post-termination notice will be left at the service address.**

**WINTER NOTICE PROVISIONS (between December 1 - March 31)**

- **If we shut off your service during the winter months (between Dec.1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected.
- **Contact us BEFORE the shut-off date** to give us household income and occupant information to see if you qualify for any assistance programs.
- **If your income is at or below 250% of the federal poverty guidelines, we must first ask the PUC for permission to shut off your service.** Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in the chart below for your household size, call us immediately at 1-800-962-4848. You may need to provide us with proof of your income.

<b>Monthly Income at 250% of Federal Poverty Level</b> (Add \$ 1,071 for each additional household member)				
Household Size	1	2	3	4
Monthly Income	\$ 3,038	\$ 4,108	\$ 5,179	\$ 6,250



**IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE**

- If you have questions or need more information, please call us today at 1-800-962-4848. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut-off if you file the complaint before the shut-off date. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
- If you currently have a valid Protection From Abuse Order or a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against you, your service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. Call us immediately at 1-800-962-4848. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment arrangement or special assistance programs. Call 1-800-962-4848 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- Having trouble paying your electric bill? Help is available! Please visit [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) and click on "Search Assistance Programs" to find out if you qualify. You may also call 211 for utility assistance.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 1-800-962-4848.
- If you have trouble understanding or speaking English or have a disability please call us at 1-800-962-4848 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past-due.
- All adult occupants of the premises whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premises may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.
- After all conditions have been met to have the service turned back on, it may take up to three days to have your service restored. Please contact us to discuss the details.
- **With the Pennsylvania Public Utility Commission's approval, we are notifying all customers of a change in the procedure for disconnection for nonpayment. The company representative will now attempt to complete a remote disconnection and may no longer need access to the meter. All other regulatory noticing leading up to disconnect will continue with no change, and a post-termination notice will be left at the service address.**

**WINTER NOTICE PROVISIONS (between December 1 - March 31)**

- **If we shut off your service during the winter months (between Dec.1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected.
- **Contact us BEFORE the shut-off date** to give us household income and occupant information to see if you qualify for any assistance programs.
- **If your income is at or below 250% of the federal poverty guidelines, we must first ask the PUC for permission to shut off your service.** Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in the chart below for your household size, call us immediately at 1-800-962-4848. You may need to provide us with proof of your income.

<b>Monthly Income at 250% of Federal Poverty Level</b>				
<b>(Add \$ 1,071 for each additional household member)</b>				
Household Size	1	2	3	4
Monthly Income	\$ 3,038	\$ 4,108	\$ 5,179	\$ 6,250

10/19/2023  
 Penelec  
 PO Box 16001  
 Reading, PA 19612-6001  
 1-800-962-4848

10 DAY SHUT-OFF NOTICE  
 AVISO DE SUSPENSION DE SERVICIO

Your Electric Service May Be Shut Off !

Because your bill is past-due, we will shut off the service to:

INDIANA PA 15701  
 on or after 8 a.m. on 11/02/2023. We may act on this notice for up to 60 days.

**We will NOT Shut off your electric service if you do ONE of the following:**

- Call us at 1-800-962-4848 to arrange to pay your past-due bill of \$727.13.
- Pay the amount you owe on your payment arrangement. Call us at 1-800-962-4848 amount.
- Show us a paid receipt for the past-due amount.
- Call 1-800-962-4848 right away if you dispute this bill or to provide us with household income and occupant information. You may be eligible for a payment arrangement or special assistance programs.

If we shut off your electric service, you may have to pay all of the following before we can turn your service on:

Past-Due Bill	\$727.13
Turn-on Charge	\$32.00
Security Deposit	\$0.00
<b>Total</b>	<b>\$759.13</b>

To talk about your bill, please call our office at 1-800-962-4848.

**MEDICAL EMERGENCY NOTICE**

Let us know if someone living in your home is seriously ill or has a medical condition. **WE**

**WILL NOT SHUT OFF YOUR SERVICE provided you:**

1. Have your licensed physician, nurse practitioner or physician assistant certify in writing that you or a member of your household is seriously ill or have been diagnosed with a medical condition which requires the continuation of service to treat the medical condition.  
AND
2. Make some equitable arrangements to pay the company your current bills for service.

**IMPORTANT TO KNOW:** Before we shut off your utility service please read the back of this notice. You may be eligible for certain protections from shut-off.

**Atencion ! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 1-800-962-4848**

TERM10

**SERVICE TERMINATION NOTICE**

Return this part with a check or money order  
 Payable to Penelec.



PO Box 16001  
 Reading, PA 19612-6001

Account Number: [REDACTED]

Amount Paid	[REDACTED]
Amount Due	\$727.13
Due Date	11/02/2023

INDIANA PA 15701-2839

PENELEC  
 PO BOX 3687  
 AKRON OH 44309-3687

FE PA Response to CAUSE-PA Interrogatory Set III, No. 1  
Attachment C

Witness: M. A. Jones  
Page 2 of 2

- If you have questions or need more information, please call us today at 1-800-962-4848. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut-off if you file the complaint before the shut-off date. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
- If you currently have a valid Protection From Abuse order or a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against you, your service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. Call us immediately at 1-800-962-4848. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment arrangement or special assistance programs. Call right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents. 1-800-962-4848
- Having trouble paying your electric bill? Help is available! Please visit [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) and click on "Search Assistance Programs" to find out if you qualify. You may also call 211 for utility assistance.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 1-800-962-4848.
- If you have trouble understanding or speaking English or have a disability, please call us at 1-800-962-4848 for a free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past-due.
- All adult occupants of the premises whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premises may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.
- After all conditions have been met to have the service turned back on, it may take up to three days to have your service restored. Please contact us to discuss the details.
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**WINTER NOTICE PROVISIONS (between December 1 - March 31)**

- If we shut off your service during the winter months (between Dec.1 - Mar. 31) we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected.
- Contact us BEFORE the shut-off date to give us household income and occupant information to see if you qualify for any assistance programs.
- If your income is at or below 250% of the federal poverty guidelines, we must first ask the PUC for permission to shut off your service. Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in the chart below for your household size, call us immediately at 1-800-962-4848. You may need to provide us with proof of your income.

<b>Monthly Income at 250% of Federal Poverty Level</b>				
<small>(Add \$1,071 for each additional household member)</small>				
Household Size	1	2	3	4
Monthly Income	\$3,038	\$4,108	\$5,179	\$6,250

TERM 11



Penelec  
 P.O. Box 3687  
 Akron, OH 44309-3687

Toll Free Number:  
 1-800-962-4848

**YOUR ELECTRICITY HAS BEEN SHUT OFF**

Account Number: [REDACTED] Date: 07/31/2023 Time: \_\_\_\_:\_\_\_\_

[REDACTED]	\$ 87.68	Past-Due Amount
[REDACTED]	\$ 0.00	Security Deposit
WINDBER PA 15963	\$ 32.00	Reconnect Charge
		If Terminated
	\$ 119.68	Total Amount Due
		If Terminated

**We shut off your electricity because:**

- You did not pay your past-due bill.
- You did not pay your security deposit.
- You did not give us access to your meter.
- You did not meet the requirements and/or complete the application for service process.
- Theft of Service or Tampering with utility equipment.
- Rejected Payment.
- Fraud/Material misrepresentation.

**TO HAVE YOUR SERVICE TURNED BACK ON YOU MUST DO ALL OF THE FOLLOWING:**

1. Call us at 1-800-531-4328 to arrange to pay your overdue bill of \$ 87.68 .
2. Pay a Turn On Charge of \$ 32.00.
3. Pay a Security Deposit (if required) of \$ 0.00 .
4. Other: \_\_\_\_\_.

You must contact us after your payment has been made to be sure you've met all conditions to have the service turned back on and to arrange access to your premises.

If you are unable to pay the deposit in full, you have the option of paying it in three installments. A 50 percent initial payment is due now to have service restored. Another payment of 25 percent will be due with your next bill, and a final payment of 25 percent will be due with the following bill. Please note that the deposit installments will be in addition to any other amount due on your account.

You have the option to obtain a third-party guarantor instead of a cash deposit. A third-party guarantor is a person that meets credit requirements and is willing to co-sign for you.

If you are interested in paying your deposit in installments or using a third-party guarantor, please contact us at 1-800-962-4848 to discuss these options.

Your security deposit will be waived if you are confirmed income eligible for a customer assistance program. To apply, visit [dollarenergy.org/myapp](http://dollarenergy.org/myapp) or call Dollar Energy Fund at 888-282-6816 to provide your income information and discuss eligibility.

- If someone in your home is seriously ill, read the **MEDICAL EMERGENCY NOTICE** below.

### **MEDICAL EMERGENCY NOTICE**

Let us know if someone living in your home is seriously ill or has a medical condition. **WE MAY RESTORE YOUR SERVICE** provided you:

1. Have your licensed physician, nurse practitioner, or physician assistant certify in writing that you or a member of your household is seriously ill or have been diagnosed with a medical condition which requires the continuation of service to treat the medical condition.  
AND
2. Make some equitable arrangement to pay the company your current bills for service.

### **IMPORTANT SAFETY INFORMATION**

- Please be aware that using candles, portable heaters, gas appliances and gasoline or diesel-powered generators to light or heat your home may be dangerous. Portable heaters and burning candles that are left unattended, especially around children and pets, can create a fire hazard. In addition, portable heaters and gasoline or diesel-powered generators can produce deadly levels of carbon monoxide and should never be operated inside the home or garage. For more safety information, contact your local fire department.
- For heating purposes use only equipment that is made for home heating. Use all types of heaters carefully and follow all directions for safe use. NEVER use your oven, grill or clothes dryer to heat your home. This could cause a fire or dangerous carbon monoxide gas.

If you have questions or need more information, please call us today at 1-800-962-4848. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC will attempt to help you with your problem. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.

**WINTER NOTICE PROVISIONS (between December 1 - March 31)**

- **If your income is at or below 250% of the federal poverty guidelines you may qualify for special protections from termination.** Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in the chart below for your household size, call us immediately at 1-800-962-4848. You may need to provide us with proof of your income.

<b>Monthly Income at 250% of Federal Poverty Level</b> (Add \$ 1,071 for each additional household member)				
Household Size	1	2	3	4
Monthly Income	\$ 3,038	\$ 4,108	\$ 5,179	\$ 6,250

- **If we shut off your service during the winter months (between Dec.1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected.

**IMPORTANT INFORMATION**

- If you currently have a valid Protection From Abuse Order or a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against you, your service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. Call us immediately at 1-800-962-4848. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment arrangement or special assistance programs. Call 1-800-962-4848 **right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- Having trouble paying your electric bill? Help is available! Please visit [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) and click on "Search Assistance Programs" to find out if you qualify. You may also call 211 for utility assistance.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 1-800-962-4848.
- If you have trouble understanding or speaking English or have a disability please call us at 1-800-962-4848 for free interpretation.
- Termination of service may result in extensive property damage. You are responsible for taking all steps necessary to protect the property and the occupants. If you do not own the property, you are responsible for notifying your landlord that the service is turned off.
- All adult occupants of the premises whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment to restore service.
- ANY adult occupant who has been living at the premises may have to pay all or portions of the bill to have service restored.
- **With the Pennsylvania Public Utility Commission's approval, we are notifying all customers of a change in the procedure for disconnection for nonpayment. The company representative will now attempt to complete a remote disconnection and may no longer need access to the meter. All other regulatory noticing leading up to disconnect will continue with no change, and a post-termination notice will be left at the service address.**



Penelec  
P.O. Box 3687  
Akron, OH 44309-3687

Número para llamada gratis:  
1-800-962-4848

### SU SERVICIO DE ELECTRICIDAD HA SIDO DESCONECTADO

Número de cuenta: [REDACTED] Fecha: 07/31/2023 Hora: \_\_\_\_:\_\_\_\_

[REDACTED]	\$ 87.68	Monto vencido
[REDACTED]	\$ 0.00	Depósito de seguridad
WINDBER PA 15963	\$ 32.00	Cargo de reconexión
		Si se rescinde
	\$ 119.68	Monto total adeudado
		Si se rescinde

#### Hemos cortado su electricidad porque:

- No pagó su factura vencida.  
 No pagó su depósito de seguridad.  
 No nos dio acceso a su medidor.  
 No cumplió con los requisitos y/o no completó el proceso de solicitud de servicio.  
 Robo de servicio o manipulación de equipos de servicios públicos.  
 Pago rechazado.  
 Fraude/Falsificación o desfiguración de materiales.

#### PARA QUE SU SERVICIO SEA REESTABLECIDO, DEBE HACER TODO LO SIGUIENTE:

1. Llamarnos al 1-800-531-4328 para hacer un arreglo para pagar su cuenta vencida de \$ 87.68 .
2. Pagar un cargo de reconexión de \$ 32.00.
3. Pagar un depósito de seguridad (si requerido), de \$ 0.00 .
4. Otro(s) requisito(s): \_\_\_\_\_.

Nos debe contactar una vez que su pago haya sido hecho para asegurarnos que ha satisfecho todas las condiciones para tener el servicio reconectado y para coordinar el acceso a sus instalaciones.

Si no puede pagar el depósito en su totalidad, tiene la opción de pagarlo en tres cuotas. Un pago inicial del 50 por ciento debe ser hecho ahora para poder reconectarle el servicio. Otro pago del 25 por ciento deberá ser abonado con su próxima factura, y el pago final del 25 por ciento restante deberá hacerse con la siguiente factura. Note que los montos correspondientes al depósito serán por encima de cualquier otro monto adeudado en su cuenta.

Tiene la opción de conseguir un garante en vez de pagar un depósito en efectivo. Una tercera parte garante es otra persona, aparte de usted, que satisfaga los requisitos de crédito y que esté dispuesta a firmar conjuntamente con usted.

Si está interesado en pagar su depósito en cuotas o de usar una tercera parte que garantice la integridad de su cuenta, por favor contáctenos llamando al 1-800-962-4848, para discutir estas opciones.

Su depósito de seguridad no aplicará si sus ingresos son elegibles para un programa de asistencia al cliente. Para presentar una solicitud, visite [dollarenergy.org/myapp](http://dollarenergy.org/myapp) o llame a Dollar Energy Fund al 888-282-6816 para proporcionar su información de ingresos y discutir su elegibilidad.

- Si alguien en su casa está gravemente enfermo, lea el **AVISO DE EMERGENCIA MÉDICA** a continuación:

### **AVISO DE EMERGENCIA MÉDICA**

Infórmenos si alguien que vive en su hogar está gravemente enfermo o tiene una condición médica. **PODEMOS RESTAURAR SU SERVICIO** siempre que:

1. Haga que su médico autorizado, enfermero practicante o asistente médico certifique por escrito que usted o un miembro de su hogar está gravemente enfermo o se le ha diagnosticado una afección médica que requiere la continuación del servicio para tratar la afección médica.  
Y...
2. Haga algún arreglo equitativo para pagarle a la compañía sus facturas actuales por el servicio.

### **INFORMACIÓN IMPORTANTE DE SEGURIDAD**

- Sepa que el uso de velas, calentadores portátiles, aparatos de gas y generadores de gasolina o diésel para iluminar o calentar su hogar puede ser peligroso. Los calentadores portátiles y las velas encendidas que se dejan desatendidos, especialmente alrededor de niños y mascotas, pueden generar un riesgo de incendio. Además, los calentadores portátiles y los generadores de gasolina o diésel pueden producir niveles mortales de monóxido de carbono y nunca deben operarse dentro de la casa o del garaje. Para obtener más información de seguridad, comuníquese con el departamento de bomberos local.
- Para fines de calefacción, use solo equipos que estén hechos para calentar el hogar. Use todos los calentadores con cuidado y siga todas las instrucciones para un uso seguro. NUNCA use su horno, parrilla o secadora de ropa para calentar su hogar. Esto podría provocar un incendio o un peligroso gas de monóxido de carbono.

Si tiene preguntas o necesita más información, llámenos hoy al 1-800-962-4848. Después de hablar con nosotros, si no está satisfecho, puede presentar una queja ante la Comisión de Servicios Públicos (PUC, por sus siglas en inglés). La PUC intentará ayudarlo con su problema. Para comunicarse con ellos llame al (800) 692-7380 o escriba a la: Comisión de Servicios Públicos de Pennsylvania, Box 3265, Harrisburg, PA 17105-3265.

**AVISO DE DISPOSICIONES PARA EL INVIERNO (entre el 1 de diciembre y el 31 de marzo)**

- **Si su ingreso es igual o inferior al 250% de las pautas federales de pobreza, puede calificar para protecciones especiales contra la terminación de servicio eléctrico.** Sume los ingresos mensuales de los adultos en su hogar. Si ese número es igual o menor que la cantidad indicada en la tabla a continuación para el tamaño de su hogar, llámenos inmediatamente al 1-800-962-4848. Es posible que deba proporcionarnos una prueba de sus ingresos.

<b>Ingreso mensual del 250% del nivel federal de pobreza</b> (Sume \$ 1,071 a cada miembro adicional de su hogar)				
Tamaño de su hogar	1	2	3	4
Ingreso mensual	\$ 3,038	\$ 4,108	\$ 5,179	\$ 6,250

- **Si suspendemos su servicio durante los meses de invierno (entre el 1ro de diciembre y el 31 de marzo)** reconectaremos su servicio dentro de las 24 horas de haber satisfecho todos los requisitos/ condiciones paratener el servicio reestablecido.

**INFORMACIÓN IMPORTANTE**

- Si actualmente tiene una orden de protección válida contra el abuso o una orden judicial emitida por un tribunal de jurisdicción competente en este Estado Libre Asociado, que proporciona evidencia clara de violencia doméstica en su contra, su servicio no puede cancelarse durante el invierno sin el permiso de la Comisión de Servicios Públicos. Hay algunas protecciones adicionales disponibles para usted. Llámenos inmediatamente al 1-800-962-4848.(Se le pedirá que nos proporcione una copia de la orden).
- Es posible que pueda ser elegible para un arreglo de pago o programas de asistencia especial. Llame al 1-800-962-4848 **de inmediato** para brindarnos información sobre los ingresos del hogar y los ocupantes. Documentación de tus ingresos pueden ser requeridos, tales como talones de pago o documentos fiscales.
- ¿Tiene problemas para pagar su factura de electricidad? ¡Hay ayuda disponible! Visite [firstenergycorp.com/billassist](http://firstenergycorp.com/billassist) y haga clic en "Buscar programas de asistencia" para averiguar si califica. También puede llamar al 211 para obtener asistencia con los servicios públicos.
- Si su arrendador es quien paga su factura de servicios públicos: Tiene ciertas protecciones legales. Llámenos al 1-800-962-4848.
- Si tiene problemas para entender o hablar inglés o tiene una discapacidad, llámenos al 1-800-962-4848 para obtener interpretación gratuita.
- La terminación del servicio puede resultar en daños materiales extensos. Usted es responsable de tomar todas las medidas necesarias para proteger la propiedad y sus ocupantes. Si no es dueño de la propiedad, es responsable de notificar al arrendador que el servicio está desconectado.
- Todos los ocupantes adultos de las instalaciones cuyos nombres están en la hipoteca, escritura o contrato de arrendamiento se consideran 'clientes' y son responsables del pago para restablecer el servicio.
- CUALQUIER ocupante adulto que haya estado viviendo en las instalaciones puede tener que pagar la totalidad o parte de la factura para que se restablezca el servicio.
- Con la aprobación de la Comisión de Servicios Públicos de Pensilvania, estamos informando a todos los clientes sobre un cambio en el procedimiento de desconexión por falta de pago. El representante de la compañía ahora intentará completar una desconexión remota y es posible que ya no necesite acceder al medidor. Todos los demás avisos regulatorios previos a la desconexión continuarán sin cambios y se dejará un aviso posterior a la terminación en la dirección del servicio.



**Penelec**  
**30 DAY SHUT OFF NOTICE TO TENANTS**  
**AVISO DE SUSPENSION DE SERVICIO**

**NAME:**                      **OCCUPANT**    **DATE:**    **07/20/2023**

**ACCOUNT:**                      [REDACTED]

**ADDRESS:**                      [REDACTED], BARNESBORO PA 15714

**WARNING:**

Your Penelec Electric Service may be shut off on or after 8:00 AM \_\_\_/\_\_\_/\_\_\_ because your landlord failed to pay for the electric service. To stop the shut-off of your utility service, you must do one of the following things:

1. You can join with the other tenants to pay the Penelec bill for the last month or you can pay the total bill yourself. Either way, you do not have to pay a deposit or get credit granted in your name. You will not have to pay your landlord's other debts or the debts of prior tenants. The utility service will remain in the name of the landlord.
2. By law, you may deduct your payment to Penelec from your rent, due now or in the future. We will tell your landlord how much you paid for that utility service.

**ADDITIONAL INFORMATION**

1. The bill which must be paid to continue service is \$ 928.35 .
2. Your landlord cannot punish you if you pay the utility bill. Your landlord cannot raise your rent, cannot evict you, and cannot take action against you in any other way for paying the utility bill and deducting it from your rent.
3. You have the right to dispute the accuracy of the bill and have certain other rights. If you would like further information regarding these rights, contact Penelec at 1-800-962-4848. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC will attempt to help you with your problem. Call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
4. You must make the payment directly to us, in cash, or by check or money order made out to Penelec. **We may require you to show us some form of identification such as: Driver's License, State or Government Photo Identification, Food Stamp Identification, Medical Assistance Identification, Document from local, city, state , or federal governmental agency that lists your name and address.**
5. **With the Pennsylvania Public Utility Commission's approval, we are notifying all customers of a change in the procedure for disconnection for nonpayment. The company representative will now attempt to complete a remote disconnection and may no longer need access to the meter. All other regulatory noticing leading up to disconnect will continue with no change, and a post-termination notice will be left at the service address.**

**MEDICAL EMERGENCY NOTICE**

Let us know if someone living in your home is seriously ill or has a medical condition. **WE WILL NOT SHUT OFF YOUR SERVICE** provided you:

1. Have your licensed physician, nurse practitioner, or physician assistant certify in writing that you or a member of your household is seriously ill or have been diagnosed with a medical condition which requires the continuation of service to treat the medical condition; AND
2. Make some equitable arrangement to pay the company your current bills for service.





37 Day Shut-Off Notice  
For Landlord Ratepayer

Penelec  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
1-800-962-4848 (Toll-Free)

[Redacted]  
SALIX PA 15952

Account Number: [Redacted]  
Meter Number: [Redacted]

Your service at [Redacted] SALIX PA 15952 may be shut off because:

Your bill is seriously past due in the amount of \$357.84.

We Will NOT shut off Your Service If You:

- \* Pay the past-due amount in full before 12/11/2023.
- \* **Make check or money order payable to** Penelec.
- \* Show us a paid receipt for the past-due amount. \$357.84
- \* Call the number listed above right away to make payment arrangements.

Other: \_\_\_\_\_

Your Tenants Will Be \_\_\_\_\_ Notified \_\_\_\_\_

We will notify your tenants on or after 11/02/2023 that we will shut the service off. At that time, we will also inform them of their rights under Pennsylvania law.

Pennsylvania law states that you must give us the names and addresses of all tenants the shutoff will affect. You must give us this information within seven (7) days of the date you receive this notice, unless you pay the total past-due amount or make satisfactory payment arrangements with us. You may have to pay money to Penelec as damages between \$500 and \$1,000 for each day you do not give us this tenant information. You may call or write our office at the phone number or the address shown above.

If We Shut Off Your Tenants' Service

You will have to pay the following before we can turn it back on:

- \* The past due amount; and
- \* a turn-on charge; and
- \* a security deposit equal to two months of average billing.

We may not be able to restore your service until 4:00 p.m. the next business day.

LANDP1

With the Pennsylvania Public Utility Commission's approval, we are notifying all customers of a change in the procedure for disconnection for nonpayment. The company representative will now attempt to complete a remote disconnection and may no longer need access to the meter. All other regulatory noticing leading up to disconnect will continue with no change, and a post-termination notice will be left at the service address.

**To File a Complaint...**

To talk about your bill, please call us at the number listed above or visit your local Penelec office, listed above, Monday through Friday from 8:00 a.m. to 6:00 p.m.

**After** you talk with us, if you are not satisfied, you have a legal right to file a complaint with the Public Utility Commission. You may do so by calling the Public Utility Commission toll-free at 1-800-692-7380 or by writing: Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265.

If you file a complaint within seven (7) days of the date on this notice, we will not notify your tenant(s) that we will shut their service off. Also, we will not shut the service off until the PUC settles your complaint.

**MEDICAL EMERGENCY NOTICE**

Let us know if someone living at the service address is seriously ill or has a medical condition. WE WILL NOT SHUT OFF THE SERVICE provided you:

- (1) Contact us immediately; and
- (2) Make some equitable arrangement to pay the company your current bills for service.
- (3) Have a licensed physician, nurse practitioner or physician assistant certify in writing that someone living at this service address is seriously ill or has been diagnosed with a medical condition which requires the continuation of service to treat the medical condition.

Este es un mensaje muy importante. Si usted no lo entiende, favor de llamar al numero de telefono que aparece en este documento.

Penelec

LANDP2

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 2**

“Please provide a copy of the following, as of the most current version available:

- A. Field representative contact guide for residential customers;
- B. All field guides utilized by FE PA or representatives of FE PA, including FE PA’s moratorium season field guide and non-moratorium season field guide;
- C. Policies and procedures related termination for nonpayment for residential customers for field representatives and call center representatives;
- D. Any and all blocking guidelines for FE PA field representatives for residential customers;
- E. Written procedures and policies for medical certificates;
- F. Training materials, slides, or other documents utilized by FE PA for residential credit and collections.

If the policies, procedures, and/or other information contained in the above vary by Rate District, customer demographics (including low income customers, Spanish-speaking customers, and/or limited English proficiency (LEP) customers), or any other factors, please specifically describe any variation, and provide a copy of any policies, procedures, training materials, or other documents which describe the varied guidelines, procedures, and/or policies.”

**RESPONSE:**

- A. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, Attachment A.
- B. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, Attachments B and C.
- C. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, CONFIDENTIAL Attachments D, E, F, and G.
- D. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, CONFIDENTIAL Attachment H.
- E. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, CONFIDENTIAL Attachments I and J.
- F. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 002, CONFIDENTIAL Attachments K, L, M, N, and O.

## **Field Rep Personal Contact Guidelines**

### **Residential Customers**

The purpose of this document is to ensure that employees attempt to make personal contact with the customer and provide information for possible assistance and payment options to avoid termination of electric service and to ensure that proper care is taken by the employee at the customer's premise.

#### **Attempt to Make Personal Contact:**

A short ring of the doorbell or knock is sufficient. Employees must wait a reasonable time (approx. 20-30 sec) before repeating knocking/ringing the customers' bell. DO NOT BANG on the customer's door with your tools or any other object.

Employee must take the following measures when the customer answers the door:

- Identify yourself as an employee of FirstEnergy: (Met-Ed, Penn Power, Penelec or West Penn Power) the Electric Co.
- Address the customer by name (Mr., Mrs. or Miss)
- Advise the customer about the nature of the visit – to deliver a termination notice
- Restrict conversations to business related matters
- If asked display your employee identification badge
- Do not enter the customer's home.

#### **Respect of Customer/Property:**

Care must be taken to prevent soiling, damaging, defacing any customer's property. Do not dispose of any trash. If any damage is done by the employee, promptly report the incident to your supervisor.

Smoking on or near the customer's property is strictly prohibited.

Do not take shortcuts across the customers' lawn. Walk around. Do not climb or jump over any fences or railings.

- Monday termination date will be Thursday.
- Tuesday thru Friday termination date will be following Monday.

It is essential that personal contact is attempted at the property.

If no contact is made:

- Post 48HN in a conspicuous location at the property.

If contact is made:

- Contact must be made with an adult occupant or household member.
- Advise that you are there to deliver a notice of termination.
- Make sure termination date is written on the 48HN.
- Advise the customer: Electric service is scheduled to be temporarily terminated on (DATE) and they should contact the Customer Care number to discuss available payment and assistance options to prevent termination.
- If you become aware that there is a medical condition in the home or the customer or household member has been granted a Protection from Abuse (PFA) Order, direct them to the Customer Care number where they can have related questions answered more fully.
- Offer assistance information

We will not accept payments in the field.

- If customer offers payment, advise them we will not accept payment in the field
- Advise they should contact Customer Care to make a payment or arrangements prior to the termination date

If the customer states they have made a payment -

- Contact Office Support to confirm
  - If confirmed that the payment has posted and satisfied the termination amount, you do not need to leave the notice
  - If the payment has not posted, advise the customer that termination will continue unless the payment is posted to the account

- Monday thru Thursday, the termination date will be the following Monday.
- Friday, the termination date will be Tuesday.

It is essential that personal contact is attempted at the property.

If no contact is made:

- Post 48HN in a conspicuous location at the property.

If contact is made:

- Contact must be made with an adult occupant or household member.
- Advise that you are there to deliver a notice of termination.
- Make sure termination date is written on the 48HN.
- Advise the customer: Electric service is scheduled to be temporarily terminated on (DATE) and they should contact the Customer Care number to discuss available payment and assistance options to prevent termination.
- If you become aware that there is a medical condition in the home or the customer or household member has been granted a Protection from Abuse (PFA) Order, direct them to the Customer Care number where they can have related questions answered more fully.
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- Advise they should contact Customer Care to make a payment or arrangements prior to the termination date

If the customer states they have made a payment -

- Contact Office Support to confirm
  - If confirmed that the payment has posted and satisfied the termination amount, you do not need to leave the notice
  - If the payment has not posted, advise the customer that termination will continue unless the payment is posted to the account

Make several copies of the notice to take with you.

These notices are for meters that are in the Landlord/Property owner's name.

It is essential that personal contact is attempted at the property.

- If you have access to the apartments/units, the notice must be posted on each door. If you do not have access, the notice must be posted on all entrance doors.
- Occupants can pay the last 30-day bill to avoid termination.
- Advise the occupant that they will need to contact the Customer Care number to make payment or get payment information to prevent termination.

We will not accept payments in the field.

- If customer offers payment, advise them we will not accept payment in the field
- Advise they should contact Customer Care to make a payment or arrangements prior to the termination date

If the customer states they have made a payment -

- Contact Office Support to confirm
  - If confirmed that the payment has posted and satisfied the termination amount, you do not need to leave the notice
  - If the payment has not posted, advise the customer that termination will continue unless the payment is posted to the account

After notice is delivered:

- Complete order in tablet ASAP
  - Document if contact was made, where the notice was posted, and any relevant information

## 2023-2024 Winter Collection Guidelines

Winter "collection" rules become effective December 1<sup>st</sup>. Accordingly, residential accounts with household incomes at or below 250% of Federal Poverty Levels (Income Levels A, B, L & T) are **exempt from termination until after March 31st**.

Employee Responsibility – Employees are primarily responsible for their own safety. Each employee must become thoroughly familiar with and observe all the practices set forth in the Accident Prevention Handbook (APH) and perform duties in a manner that will always ensure maximum safety to oneself, fellow employees, and the public.

### GENERAL INFORMATION:

## Safety should be your #1 priority!

- All employees must always wear the appropriate Personal Protective Equipment. The use of PPE does not eliminate hazards or replace the need for following established safe work practices.
- A few safety tips to keep in mind when attempting to make contact:
  - Masks may be worn at employee's discretion
  - Always be aware of your surroundings
  - Stand to the side of the door when knocking
  - Do Not open the screen door
  - Block the screen door with your foot
  - When talking to customers, keep your eyes on the customer and keep a six-foot distance
- There are no temperature restrictions for Non-Residential accounts
- Temperature restrictions will apply to residential accounts – If in a 24HR period the actual temperature forecast will be 32 degrees or below, we will not terminate. Management team will monitor and communicate to the field.
- There will be NO Friday terminations!
- Effective December 1st, we must once again use the 48-hour notice for Residential accounts that are eligible for termination.
- **Remarks are required on the FieldNet comments screen on every account stating where notice/post was left (i.e.: PND delivered/Posted on door, 48HN**

**delivered/Posted on door, Post term notice delivered/posted on door. etc.)**

**TERMINATING SERVICE VIA OPTICAL METER PROBE:**

- Most Single Phase, Class 200 Smart meters form 1S, 2S and 12S can be disconnected Over the Air. In the rare case that the meter is not RCD certified, service can be disconnected using the probe. Smart meters that can be disconnected using OTA or probed should not be removed from the socket to install blocking boots. Always use OTA to disconnect the service for RCD certified meters.
- If it is necessary to use the PROBE and it fails and does not open the RSS (Remote Service Switch) – complete order with code 46. Office support will review and create a service order to meter services to exchange the meter.
- We will only be disconnecting Smart Meters that can be disconnected Over the Air or probed
  - We will not physically pull any meters

## **RESIDENTIAL ACCOUNTS**

If a residential account has an income level C, D, or no income level (**blank on the service order**), they are subject to termination.

**Delivery of the 72-hour PND Notice** – Personal contact must be attempted. Enter your comments **on the remarks page (Example - PND delivered/posted on door)**. Include the Having Trouble Paying Your Electric Bill flyer, Dear Customer letter and Struggling to Pay Your Electric Bill QR handout.

### **Dunning Activity Completion Code to Use at PND Level:**

- 11 – Worked – Notice Delivered – Dunning will continue - Note Remarks for Special Circumstances: Medical Condition, etc.
- 13 – Worked – Not Terminated, Receipt Shown - A receipt for payment has been provided by the customer and is sufficient to stop term – Dunning will Continue/when payment posts and satisfies term, dunning should stop if the appropriate amount was paid

**Delivery of the 48-hour Notice** - Effective December 1st, we must once again **use the 48-hour notice** for those accounts that are eligible for termination. Personal contact must be attempted. Enter your comments **on the remarks page (Example 48HN delivered/posted on door)**. Include the Having Trouble Paying Your Electric Bill flyer, Dear Customer letter and Struggling to Pay Your Electric Bill QR handout.

### **Dunning Activity Completion Code to Use at 48HN level:**

- 11 – Worked – Notice Delivered – Dunning will continue & Disconnect will be generated. - Note Remarks for Special Circumstances: Medical Condition, etc.
  - 13 – Worked – Not Terminated, Receipt Shown - A receipt for payment has been provided by the customer and is sufficient to stop term – Dunning will Continue/when payment posts and satisfies term, dunning should stop if the appropriate amount was paid
- Verify correct code is being typed in before hitting enter

**You must attempt to make contact with the customer.** If contact is made, **advise the customer that they must contact the '800' number to discuss their account balance and**

**provide income information to avoid possible termination.**

## **Residential - Nonpayment Termination**

**DS - Disconnect** – after regulatory requirements of the 72 HR/PND & 48-hour notice(s) have been met and if the customer has not called to resolve the delinquency, you may work the DS notification on these accounts as you normally would **IF** the 24-hour actual temperature forecast is above 32 degrees. Management team will monitor and communicate to the field. Enter your comments **on the remarks page (Example: Post Term delivered/posted on door)**. Include the Having Trouble Paying Your Electric Bill flyer, Dear Customer letter and Struggling to Pay Your Electric Bill QR handout.

If contact is made we must inquire if the customer or household member:

- Has been granted a Protection from Abuse (“PFA”) Order or other court order that contains clear evidence of domestic violence
- Has a medical condition or serious illness that would be adversely affected by service termination

**Note:** If Meter Services is booting meter to block - note in comments what type of locking device used: red seal, barrel lock etc.

## **VERBAL 72 HOUR NOTICE IN LIEU OF TERMINATION:**

If Customer states any of the following:

- Protection from Abuse order (PFA)
- Medical Condition
- Filed for Bankruptcy
- Life Support
- Spouse is in the military overseas (Soldiers & Sailors Relief Act)

Or if you become aware that a dispute or complaint is pending:

- We **MUST** stop termination and give them a Verbal 72HR Notice and advise them of the new termination date. Advise the customer to call the Contact Center.
  - Complete the order in the Tough Pad with code 20
  - Upon request, the company representative will provide a copy of the Commission’s standard medical certificate form
  - A new notification will be created to be worked if the customer does not resolve their account

- **Remember to document in the comments the reason for code 20**

**Dunning Activity Codes to Use:**

- 13 – Worked, Not Terminated, Receipt Shown
    - A receipt for payment has been provided by the customer and is enough to stop term. Dunning will Continue. When the payment posts and satisfies the termination amount, dunning should stop.
  - 17 – Worked, Disconnected RSS via Probe
  - 18- Worked, Disconnected RSS Remotely
  - 20 – Try Again, will allow a new disconnection notification to be created
  - 42 – Terminated, Vacant (For confirmed vacant terminations completed)
    - Meter services manual block
  - 43 – Worked, Terminated (Physically Blocked)
    - Meter services manual block
  - 46 - Worked, Not Terminated, 3 Phase
    - Advise Why you need referral - Ex: Bypass handle, 3 Phase, etc.
  - 48 – Worked, Not Terminated, No Access
    - Note remarks: Why this is “No Access”
  - 52 – Cancelled – Service Center. Use this code when:
    - a cancel prints out, but the order is still in the Tough Pad
    - If you find a Company error before you get to property
- Verify correct code is being typed in before hitting enter

## **Non-Residential Accounts**

**Delivery of the 72-hour PND Notice** – Personal contact must be attempted. Enter your comments **on the remarks page (Example– PND delivered/posted on door)**.

### **Dunning Activity Completion Code to Use:**

- 11 – Worked – Notice Delivered – Dunning will continue – Note Remarks for Special Circumstances: Medical Condition, etc.
  - 13 – Worked – Not Terminated, Receipt Shown - A receipt for payment has been provided by the customer and is sufficient to stop term – Dunning will Continue/when payment posts and satisfies term, dunning should stop if the appropriate amount was paid.
- Verify correct code is being typed in before hitting enter

You must attempt to make contact with the customer. If contact is made, **advise the customer that they must contact the '800' number to discuss their account balance to avoid possible termination.**

## **Non-Residential - Nonpayment Terminations**

**DS - Disconnect** – after regulatory requirements of the PND notice has been met and if the customer has not called to resolve the delinquency, you may work the DS notification on these accounts. Enter your comments **on the remarks page (Example– Post Term delivered/posted on door)**.

**Note:** If meter services booting meter to block - note in comments what type of locking device used: red seal, barrel lock etc.

**Dunning Activity Codes to Use:**

- 13 – Worked, Not Terminated, Receipt Shown
  - A receipt for payment has been provided by the customer and is enough to stop term. Dunning will Continue. When the payment posts and satisfies the termination amount, dunning should stop.
- 17 – Worked, Disconnected RSS via Probe
- 18- Worked, Disconnected RSS Remotely
- 20 – Try Again, will allow a new disconnection notification to be created
- 42 – Terminated, Vacant (For confirmed vacant terminations completed)
  - Meter services manual block
  - note in comments what type of locking device used: red seal, barrel lock etc.
- 43 – Worked, Terminated (Physically Blocked)
  - Meter services manual block
  - note in comments what type of locking device used: red seal, barrel lock etc.
- 46 - Worked, Not Terminated, 3 Phase
  - Call Office Support to have rescheduled with meter services
  - Advise Why you need referral - Ex: Bypass handle, 3 Phase, etc.
- 48 – Worked, Not Terminated, No Access
  - Note remarks: Why this is “No Access”
- 52 – Cancelled – Service Center. Use this code when:
  - a cancel prints out, but the order is still in the Tough Pad
  - If you find a Company error before you get to property
  
- Verify correct code is being typed in before hitting enter

**REMEMBER! NO JOB IS AS IMPORTANT AS YOUR SAFETY**

**CONTACT CENTER COACHING ISSUES AND COMPANY ERRORS:**

- Contact Office Support to verify if a company error occurred before completing the notification in the Tough Pad. If there is an error, office support will forward the error for coaching.
  - Notification can be completed with code 52

**Owner's Meter**

If you have a shop paper that has **OWNER'S METER** listed under the Location Information or know it is an Owner's Meter or Shared Meter – **DO NOT WORK**. Call Office Support with the information and complete the order in your Tough pad with a code **52**. This should be done with PND, DS48 and DS.



A FirstEnergy Company

(DUPLICATE)

DUNNING NOTIFICATION

12/06

Issue Date  
 Main Work Center  
 Printed Date/Time

12/02/2010  
 Reading Business Office Utility  
 12/06/2010 / 10:00:18

Date Wanted 12/03/2010  
 Priority 3 Arrears

MASTER DATA

Contract Acct No  
 BP Name  
 Dunning Procedure

Rate Category  
 Home Ph No  
 ( PA Non Residential - ME01/PP01 )

Alt. Ph No.  
 Service Location:

Income Level  
 READING PA 19601

Location Information  
 Reg Str

Pole Key  
 Premise ID No

DEVICE DATA

Meter No  
 Meter Location  
 Reading Instructions

MRU-Seq  
 Outside Right

Dials	Constants	Index	Date	Enter MR Index
5.0	1.00000	24,135.0000	12/01/2010	

FIELD ACTION

- |  |   |
|--|---|
| <input type="checkbox"/> 10 - Worked- Notice Divd, Payment Collected   | <input type="checkbox"/> 45 - Worked-Not Disc, New Bus Partnr     |
| <input type="checkbox"/> 11 - Worked- Notice Delivered                 | <input type="checkbox"/> 46 - Worked- Not Disconnected, 3 Phase   |
| <input type="checkbox"/> 20 - Worked- Not Disconnected, Notice Delivrd | <input type="checkbox"/> 48 - Worked- Not Disconnected, No Access |
| <input type="checkbox"/> 42 - Disconnected, Vacant                     | <input type="checkbox"/> 49 - Not Worked- Weather                 |
| <input type="checkbox"/> 43 - Worked- Disconnected                     | <input type="checkbox"/> 63 - Worked - Courtesy Letter Delivered  |

**Delivering PND on:**

Monday  
Tuesday  
Wednesday  
Thursday  
Friday

**Use Date for:**

Monday of following week  
Monday of following week  
Monday of following week  
Monday of following week  
Tuesday of following week

**Delivering 48HN on:**

Monday  
Tuesday  
Wednesday  
Thursday  
Friday

**Use Date for:**

Thursday of current week  
Monday of following week  
Monday of following week  
Monday of following week  
Monday of following week

## **2024 PA Non-Moratorium Season**

Non-moratorium collection rules become effective April 1<sup>st</sup>. Residential accounts can be terminated for non-payment, regardless of income level.

**Safety should be your #1 priority!**

### **General Information**

- When in doubt, **STOP!**, and contact Management or Office Support immediately!
- Safety tips to keep in mind when attempting to make contact:
  - Always be aware of your surroundings.
  - Stand to the side of the door when knocking.
  - Do not open the screen door.
  - Block the screen door with your foot
  - When talking to customers, keep your eyes on the customer and keep a six-foot distance.
  - Always have DPS in your hand.
- Exercise Hazard Mitigation techniques to reduce or eliminate risk.
- Exhibit appropriate use of Pause/Stop Work Authority.
- Follow safe driving practices and be a defensive driver.
- Don the appropriate PPE and inspect your PPE regularly for wear and tear.
- Complete orders in the tough pad at the property or as close to the property where the order was worked. NEVER interact with the tough pad while driving.
- Remember to use your Safety & Human Performance and DEKRA tools.

### **Human Performance**

- The purpose of Human Performance is to protect our assets (people, equipment, products, and services) from human error. Many accidents, injuries, environmental events, equipment failure and rework are the result of gaps in human performance.

- Human Performance is not a program. It's an approach to help us continue building a culture where safety is our primary focus-every day on every job.

### **Error Prevention Tools**

- Job Briefing/Driving Briefing
- Questioning Attitude
- Self-Check / Peer Check
- 2 – Minute Drill
- Circle of Safety
- Visual Cues

### **STAR**

- STOP, THINK, ACT and REVIEW

### **Reminders**

- Attempt to be at your first account around 8am, remember that we cannot attempt to make contact prior to 8am.
- We must **ALWAYS** attempt to make contact prior to terminating service and delivering notices.
- Do not discuss the account with anyone except an adult occupant.
- There will be **NO** Friday terminations.
- There are no temperature restrictions for Non-Residential accounts.
- Starting April 1<sup>st</sup>, we will no longer be required to deliver the 48-hour notice prior to termination, except for life support and PFA.
- Office Support calls should be kept brief, but concise.
- When you have a termination notice and customer states they just moved in but has not called to apply for service, the termination may continue. **Provide the customer with a FirstEnergy business card and advise them to call the Care Center.**

- When you have a termination notice and customer states they just moved in and called for service: Contact Office Support to verify customer has called and get new termination date if there is one. Give customer new termination date. **Do not leave any paperwork with the customer.**
- **DO NOT** accept payments in the field. (With the exception of NY customers)
  - If a customer tapes payment to the meter or door, **DO NOT TAKE** the payment, continue with termination. Call your Office Support person to document the account that payment was left by customer and was not accepted.
  - Qualifying taped receipts WILL stop termination.
- Manual terminations: Call when you complete the order. DO NOT wait until the end of day. Office Support will document and track.
- If you deploy DPS or spray an animal on a customer's property, you must contact your supervisor, even if you had contact with the customer. The account must be documented ASAP. If no contact is made with the customer, a supervisor will attempt to contact them.

### **Terminating Service**

- Most Single Phase, Class 200 Smart meters form 1S, 2S and 12S can be disconnected Over the Air. Always use OTA to disconnect the service for RCD certified meters.
- If probing a meter is necessary, this should be coordinated with Office Support or Management.
- We will not physically pull any meters.

## **Delivering Notices and Terminating Service**

### **Delivery of the 72 Hour PND Notice**

- Personal contact must be attempted. Note comment on the remarks page – PND delivered and where it was posted.
- We MUST leave the PND prior to terminating any service. Even if we clearly know the property is vacant – a PND must be left at least 3 days prior to termination.
- Termination notices posted in common areas of Apartment buildings must be posted discreetly using an envelope.

**Dunning Activity Completion Code to use at the PND Level**

- 11 – Worked, Notice Delivered – Dunning will continue - Note comment on the remarks page
- 13 – Worked, Not Terminated, Receipt Shown
  - A receipt for payment has been provided by the customer and is sufficient to stop term

**When delivering a PND use the following termination days**

**Delivering PND on a:**

Monday  
Tuesday  
Wednesday  
Thursday  
Friday

**Use Termination date of:**

Monday of the following week.  
Tuesday of the following week

**Delivery of the 48HN Life Support**

Personal contact must be attempted. **Note comment on the remarks page – 48HN delivered and where it was posted.**

- Attempt to verify customer still on life support and what the medical condition is. Emphasize to customer that the termination will continue, and the service could be disconnected if not resolved.
- Call Office Support to report any updated findings or information. Office support will review account and manually create post term when scheduling for disconnection.

**Dunning Activity Codes to Use**

- 11 – Worked, Notice Delivered – Call Office Support to advise that the order was completed.
- 13 – Worked, Not Terminated, Receipt Shown.
  - A receipt for payment has been provided by the customer and is enough to stop term.

**Delivery of the 48HN Protection from Abuse**

Personal contact must be attempted. **Note comment on the remarks page – 48HN delivered and where it was posted.**

- **Note: PFA accounts have a future dated contact and can be identified by reviewing the Shop Paper**

**Dunning Activity Codes to Use**

- 13 – Worked, Not Terminated, Receipt Shown.
  - A receipt for payment has been provided by the customer and is enough to stop term.
- 25 – Worked, Notice Delivered, Protection from Abuse

**Delivery of the 10 & 30-day Landlord Tenant Notice**

Personal contact must be attempted. **Note comment on the remarks page – 10 or 30 day delivered and where it/they were posted.**

- Make Copies for all tenants/doors. Consider these notices as high priority in workload.

**Dunning Activity Completion Code to Use at 10- & 30-Day Notice Level:**

- 11 – Worked, Notice Delivered – Dunning will continue -

- 13 – Worked, Not Terminated, Receipt Shown. A receipt for payment has been provided by the customer and is enough to stop term.

**REMINDER: All Landlord/Tenant terminations must be called into Office Support**

- Field reps are to call Office Support with all LL/TN blocks **prior** to completing the block order in the tough pad.
- Office Support will remove the LL/TN code to let the block go on the system and once the rep completes the order, Office Support will put the LL/TN code back on the account.

**DS/DS48 – DISCONNECT**

After the regulatory requirements of the 72-hour PND and 48-hour notice (PFA/Life Support) have been met, you may work the DS notification on these accounts. Personal contact must be attempted.

**Note comment on the remarks page – Post Term delivered and where it was posted.**

**NOTE:** If the Heat index is above 100 degrees, Residential terminations will cease. Temperatures will continue to be monitored by the schedulers and management.

**If contact is made prior to terminating service, we must inquire if the customer or household member:**

- Has been granted a Protection from Abuse (“PFA”) Order or other court order that contains clear evidence of domestic violence.
- Has a medical condition or serious illness that would be adversely affected by service termination.

**VERBAL 72 HOUR NOTICE IN LIEU OF TERMINATION**

If a customer (residential) states any of the following:

- Protection from Abuse order (PFA)

- Medical Condition
- Filed for Bankruptcy
- Life Support
- Spouse is in the military overseas (Soldiers & Sailors Relief Act)

Or if you become aware that a dispute or complaint is pending:

We **MUST** stop termination and give them a verbal 72HR notice and advise them of the new termination date. Do not leave the post termination notice with the customer. Give the customer a FirstEnergy business card and advise them to call the Care Center.

- Complete the order in the Tough Pad with code 20
- Upon request, the company representative will provide a copy of the Commission's standard medical certificate form
- Dunning does NOT STOP. A new disconnect service notification will be created to be worked in 3 days.
- **You must document in the comments the reason for the extension.**
  - **Verbal 72hr – (Reason)**

Accounts given a 72-hour verbal extension will have a future dated contact placed on the account which can be viewed on the shop paper.

If a verbal 72-hour notice was already provided and we return to terminate because the customer has not resolved their account, we do not have to give an additional 72hr notice, however a call should be made to office support/management to review and discuss account prior to terminating.

**Dunning Activity Codes to Use:**

- 13 – Worked, Not Terminated, Receipt Shown.
  - A receipt for payment has been provided by the customer and is enough to stop term.
- 17 – Worked, Disconnected RSS via Probe.

- 18 - Worked - Disconnected RSS Remotely
- 20 – Try Again, will allow a new disconnection notification to be created.
- 46 - Worked, Not Terminated, 3 Phase
  - Document reason for code 46 - Ex: Bypass handle, CL 320, 3 Phase, etc.
- 48 – Worked, Not Terminated, No Access.
  - Note remarks: Why is this “No Access”.
- 52 – Cancelled – Service Center. Use this code when:
  - a cancel prints out, but the order is still in the Tough Pad.
  - If you find a Company error before you get to property.

**Verify the correct code is being typed in before hitting enter.**

**Field Handouts**

- Pennsylvania Assistance Programs English/Spanish double-sided handout
- PCAP Brochure
- Low Income Program QR Code Flyer

**Contact Center Coaching Issues and Company Errors**

- Contact Office Support to verify if a company error occurred before completing the notification in the Tough Pad. If there is an error, office support will forward the error for coaching.
  - Notification can be completed with code 52.

**Company & PUC Holidays**

There will be NO terminations of Residential or Commercial accounts the day of or the day before a company or PUC holiday.

Holiday
New Year's Day*
Martin Luther King Jr Day*

Presidents Day (PUC only holiday)
Memorial Day*
Juneteenth
Independence Day*
Labor Day*
Columbus Day (PUC only holiday)
Veterans Day*
Thanksgiving Day*
Day After Thanksgiving*
Christmas Eve (Company holiday only ME & PP)
Christmas Day*

\*Company & PUC Holiday

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 3**

“Please answer:

- A. Is FE PA’s Hardship Fund open year-round? If the answer is no or in the negative, please specifically state in which months and/or seasons FE PA’s Hardship Fund is not open, and identify any determining factors, conditions, or criteria which may determine whether FE PA’s Hardship Fund is open or closed;
- B. Does FE PA, or Dollar Energy Fund (DEF) as FE PA’s administrator for its Hardship Fund, impose additional requirements during certain months or seasons to qualify for a Hardship Fund grant? If the answer is yes or in the affirmative, please specifically describe any additional requirements imposed, and indicate in which months or seasons these additional requirements are imposed.”

**RESPONSE:**

- A. The hardship fund can be open year-round if funding is available. The program is closed when funds are exhausted. See FE PA Response to CAUSE Interrogatory Set II, No. 3, Attachment B for the history of fund availability.
- B. FE PA, or Dollar Energy Fund (DEF) as FE PA’s administrator for its Hardship Fund, does not impose additional requirements during certain months or seasons to qualify for a Hardship Fund grant. See FE PA Response to CAUSE Interrogatory Set II, No. 6, Attachment A for eligibility.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 5**

“Please describe in detail FE PA’s policies and procedures for monitoring DEF’s administration of FE PA’s Hardship Fund, and provide a copy of the most recent assessment, report, or other document related to FE PA’s monitoring of DEF’s administration of FE PA’s Hardship Fund, and indicate when the assessment, report, or other document is dated.”

**RESPONSE:**

FE PA does not have a formal policy or procedure for monitoring DEF’s administration of the hardship fund. However, FE PA expects that DEF will fulfill all obligations with respect to the administration of the hardship fund in accordance with the vendor agreements executed between FE PA and DEF. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 4, CONFIDENTIAL Attachments A-D for copies of the vendor agreements. See FE PA Response to OCA Interrogatory Set I, No. 1 Attachments L-P for data on the hardship fund grants and contributions.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 8**

“Please indicate, as of the most recent date available:

- A. The number of DEF full time and part time staff, respectively, available to answer consumer calls related to FE PA’s USECP Programs;
- B. The number of FE PA full time and part time staff, respectively, available to assist consumer related to FE PA’s USECP Programs.”

**RESPONSE:**

- A. As of May 3, 2024, there are 24 DEF full time staff members available to answer consumer calls related to FE PA’s USECP Programs. They are supported by two subject matter experts. Ten additional new-hire representatives are in training for call-handling.
- B. While FE PA does not have a dedicated team to answer calls regarding assistance programs, the Company has 150 Customer Service Representatives (“CSRs”), on average, that are trained to handle questions regarding assistance programs during normal Customer Service hours. The number of CSRs trained to handle the calls fluctuates throughout the year as we attrite and onboard new CSRs. The proposed EAOT would be a dedicated team to answer such calls. See FE PA Response to OCA Interrogatory Set V, No. 15 for location and full-time equivalent staffing of each call center handling PA customer calls.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 11**

“Has FE PA, or a third party on behalf of FE PA assessed adoption and/or sales of Electric Vehicles (EVs) amongst low income consumers/ households (a) nationwide, (b) in Pennsylvania, or (c) in FE PA’s service territory? If so, please describe the results of this assessment, and provide a copy of the assessment(s) and any document describing the results of the assessment(s).”

**RESPONSE:**

No, FE PA has not conducted or commissioned an assessment on the adoption or sales of EVs amongst low income households.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 12**

“Has FE PA, or a third party on behalf of FE PA, assessed what portion of EV sales are to low income consumers/ households (a) nationwide, (b) in Pennsylvania, or (c) in FE PA’s service territory? If so, please specifically describe the results of this assessment, and provide a copy of the assessment(s) and any document describing the results of the assessment(s).”

**RESPONSE:**

No, FE PA has not conducted or commissioned an assessment on the adoption or sales of EVs amongst low income households.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 13**

“Has FE PA, or a third party on behalf of FE PA, assessed the portion or number of low income consumers/ households who, as of the most recent date available, own and/or operate an EV (a) nationwide, (b) in Pennsylvania, or (c) in FE PA’s service territory? If so, please describe the results of the assessment(s), and provide a copy of the assessment(s) and any document describing the results of the assessment(s).”

**RESPONSE:**

No, FE PA has not conducted or commissioned an assessment on the adoption or sales of EVs amongst low income households.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 14**

“Has FE PA, or a third party on behalf of FE PA, assessed the average price of an EV (a) nationwide, (b) in Pennsylvania, or (c) in FE PA’s service territory? If so, please indicate what the average price for an EV is (1) nationwide; (2) in Pennsylvania; and (3) in FE PA’s service territory. Please provide a copy of the assessment and any data and/or sources relied on by FE PA in reaching these averages.”

**RESPONSE:**

According to Kelly Blue Book, the average transactional price nationwide for EVs in April 2024 was \$54,021 (<https://www.kbb.com/car-advice/how-much-electric-car-cost>). Furthermore, according to Find My Electric, the average price nationwide for the top ten electric vehicles in the US as of January 15, 2024 is \$53,758 with an average of \$48,430 for low end trim of each model (<https://www.findmyelectric.com/blog/electric-car-prices>). See also FE PA Response to CAUSE-PA Set III, No. 15.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
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**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 15**

“What is the average cost of a used EV (a) nationwide, (b) in Pennsylvania, or (c) in FE PA’s service territory? Please provide a copy of any data and/or sources relied on by FE PA in reaching these averages.”

**RESPONSE:**

The average cost of a used EV nationwide continues to fall as of Q2 2024 per sources such as Recurrent Auto and range between \$23,787 to \$51,616. FE PA does not have data specific to Pennsylvania or its service territory. See FE PA Response to CAUSE-PA Interrogatory Set III, No. 15, Attachment A.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
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**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 16**

“Has FE PA, or a third party on behalf of FE PA, assessed what portion of new vehicle sales amongst low income consumers are comprised of EVs? If so, please specifically describe the results of this assessment, and provide a copy of the assessment(s) and any document describing the results of the assessment(s).”

**RESPONSE:**

No, FE PA has not conducted or commissioned an assessment on the adoption or sales of EVs amongst low income households.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 20**

“Please describe how FE PA currently promotes its Universal Service and Energy Conservation Plan (USECP) Programs, including its PCAP, Hardship Fund, and Low-Income Usage Reduction Program (LIURP). Please provide a copy of all written correspondence and marketing materials used to inform customers about the availability of FE PA’s USECP programs since January 2022. Please indicate which, if any of these provided documents, are available in languages other than English, and specify in which languages respective documents are available.”

**RESPONSE:**

Printed materials for assistance programs:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachment A through Attachment R.

For the WARM program:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachment S through Attachment V, Attachment AB, and Attachment AE.

For email campaigns promoting energy assistance:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachment W through Attachment AD.

For outbound call campaigns promoting energy assistance:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachment AE through Attachment AJ.

For news media articles promoting the availability of assistance:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachment AK and Attachment AL.

For materials available in English and Spanish:

- See FE PA Response to CAUSE-PA Set III, No. 20, Attachments A-F and Attachment V.

## Pennsylvania Reminder

### **Live Answer:**

If this is <customer> please press 1. If you need to place this call on hold in order to bring this person to the phone, please press 2. If you can take a message for this person, please press 3. If this is the wrong number to reach this party, press 4. “We at “OpCo” realize you may be experiencing financial difficulty with the impact of the coronavirus pandemic and want to help. Please listen to this entire message because it contains valuable information that may help you pay your electric bill at <address> of \$xxx.xx during this time. To quickly determine your eligibility and confidentially self-screen on-line for the energy assistance programs currently available in Pennsylvania, please visit [www.firstenergycorp.com/billassist](http://www.firstenergycorp.com/billassist), or press star for the agency resources that may help you.

If you would like to make a payment today for free using your checking or savings account, press 5 now. You can also make your payment online at FirstEnergyCorp.com. To pay by credit card I would need to transfer you to a different system. In that system, the Credit Card Company will charge a minimum service fee of \$4.75 to process your payment. You will also need to have your FirstEnergy Account number and the service address ZIP code ready to ensure a successful payment. If you want me to transfer you now, press 6. If you have already made your payment, press 7. To hear this entire message again, please press pound. Thank you.

### **(Only if Press Star):**

The following resources are available to help pay past due bills and/or reduce your monthly bill. For the Pennsylvania Customer Assistance Program (PCAP), or Dollar Energy Fund, call 1-888-282-6816 or visit [dollarenergy.org/myapp](http://dollarenergy.org/myapp). The LIHEAP Recovery Crisis program will assist with a past due bill or notice. For more information, call your local Department of Human Services office, or 1-877-395-8930 to get an application for emergency assistance or go on-line at <https://www.compass.state.pa.us>. Applications for this program will be accepted until August 31, or until funds are exhausted. For other statewide programs call 2-1-1. To hear this entire message again, please press pound.

### **Left Message**

Hello this is an important message from <OpCo> for <customer>. Please contact us at <phone number>. Again, our number is <phone number>. You can also visit us on the web at FirstEnergyCorp.com to review your account. Good bye.

### **Phone Numbers:**

MetEd Broken Promise: 844-591-7922

MetEd Reminder: 844-591-7925

Penelec Broken Promise: 844-591-7923

Penelec Reminder: 844-591-7926

Penn Power Broken Promise: 844-591-7924

Penn Power Reminder: 844-591-7927

West Penn Power Reminder: 844-851-3528

**Alorica IVM Message (Customer calls back after live answer or left message):**

If this is <customer> please press 1. If you need to place this call on hold in order to bring this person to the phone, please press 2. If you can take a message for this person, please press 3. If this is the wrong number to reach this party, please press 4. "We at "OpCo" realize you may be experiencing financial difficulty with the impact of the coronavirus pandemic and want to help. Please listen to this entire message because it contains valuable information that may help you pay your electric bill at <address> of \$xxx.xx during this time. To quickly determine your eligibility and confidentially self-screen on-line for the energy assistance programs currently available in Pennsylvania, please visit [www.firstenergycorp.com/billassist](http://www.firstenergycorp.com/billassist), or press star for the agency resources that may help you.

If you would like to make a payment today for free using your checking or savings account, press 5 now. You can also make your payment online at FirstEnergyCorp.com. To pay by credit card I would need to transfer you to a different system. In that system, the Credit Card Company will charge a minimum service fee of \$4.75 to process your payment. You will also need to have your FirstEnergy Account number and the service address ZIP code ready to ensure a successful payment. If you want me to transfer you now, press 6. If you have already made your payment, press 7. To hear this entire message again, please press pound. Thank you.

**(Only if Press Star):**

The following resources are available to help pay past due bills and/or reduce your monthly bill. For the Pennsylvania Customer Assistance Program (PCAP), or Dollar Energy Fund, call 1-888-282-6816 or visit [dollarenergy.org/myapp](http://dollarenergy.org/myapp). The LIHEAP Recovery Crisis program will assist with a past due bill or notice. For more information, call your local Department of Human Services office, or 1-877-395-8930 to get an application for emergency assistance or go on-line at <https://www.compass.state.pa.us>. Applications for this program will be accepted until August 31, or until funds are exhausted. For other statewide programs call 2-1-1. To hear this entire message again, please press pound.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 25**

“See FE PA St. 8 at 12: 1-3. Besides monitoring the number of customers enrolled in the Company’s assistance programs compared to historical numbers, does FE PA propose to implement any other metrics related to the success and/or efforts of the Energy Assistance Outreach Team (EAOT), if implemented? If so, please specifically describe what metrics FE PA proposes to implement related to its EAOT proposal, how often such metrics will be evaluated, and whether FE PA will provide the results of this evaluation to parties, stakeholders, and/or the Commission.”

**RESPONSE:**

FE PA does not plan to implement additional metrics for the Energy Assistance Outreach Team at this time. The Company recognizes that maximizing the enrollment and participation of customers in available programs is key to the success of this team and will monitor those numbers as stated.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set III, No. 28**

“On what days and hours can a customer calling into FE PA’s Customer Care Centers:

- A. Speak to a live customer service representative;
- B. Speak to a live customer service representative related to FE PA’s USECP Programs;
- C. Access an interpreter to assist with their call through telephonic interpreting services;
- D. Access an interpreter to assist with their call through telephonic interpreting services related to FE PA’s USECP Programs.

Please also provide a copy of policies, procedures, training documents, call scripting, or any other documents which describe FE’s policies, procedures, and/or processes related to providing consumers calling into its Customer Care Centers with translation/ interpretation services.”

**RESPONSE:**

A.-D. See FE PA Response to OCA Interrogatory Set V, No. 51. The telephonic interpreting services are available at any time when the customer call center is open.

See FE PA Response to CAUSE-PA Set III, No. 28, Attachment A for policies, procedures and training documents related to translation/ interpretation services.

## Transfer to Internal Queue

Utilize the Job Aid [Call Taking - Transfer to Internal Queue](#) for step-by-step instructions without video.

Fast Track IVR Unknown Agents Only, utilize the Job Aid [Call Taking - Transfer to Internal Queue - Fast Track IVR Unknown](#).

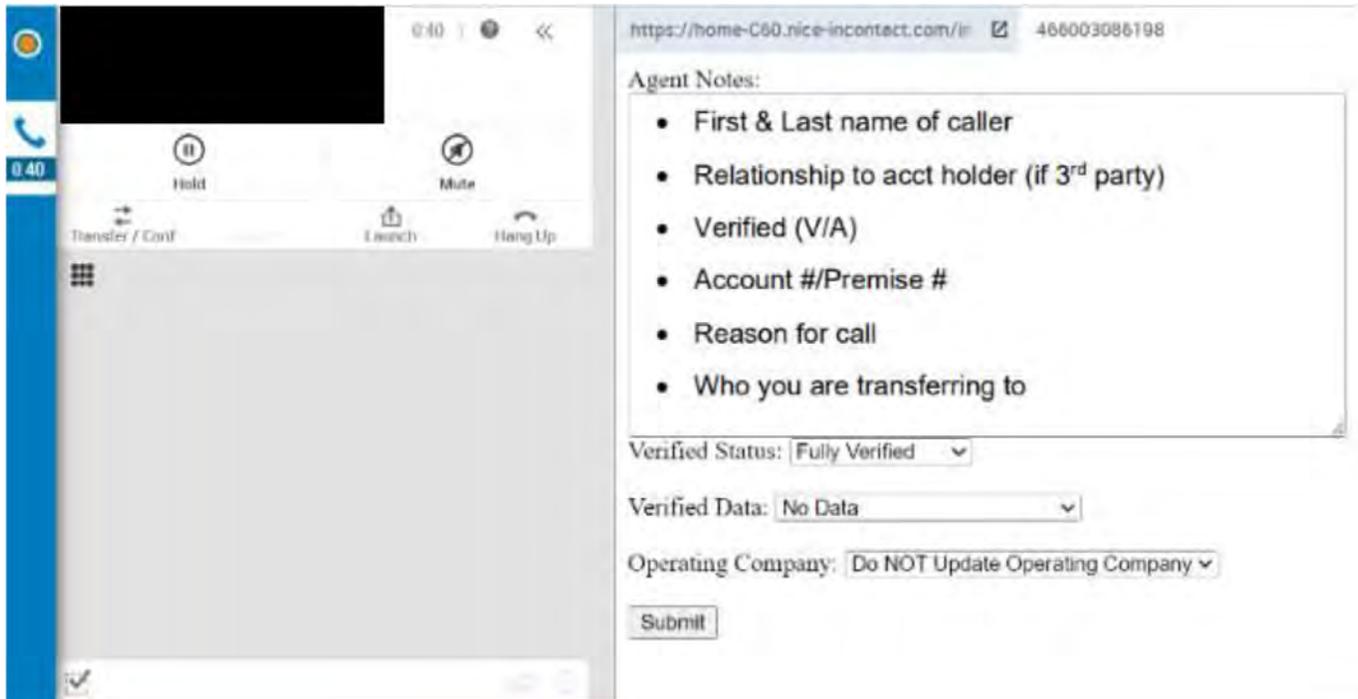
- Enter the **Transfer Notes** in the **Agent Notes Panel**. Appropriate transfer notes can be found in the [Basic Call Scripts QRC](#).
- Copy the transfer notes to include in **CRM** documentation.
  - If no other documentation is taking place on the account, create a **General Inquiry** contact note.
- After the contact note is saved, "**End**" the account in **CRM** and return to **Max Agent**.
- Select "**Submit**" to transfer **Agent Notes** to the next Agent.
- Select **Transfer/Conf** and search for the queue. Utilize the [Call Transfer CRM QRC](#) to determine the correct queue.
- Select **Call** and then **Transfer**.

## Agent Notes Panel

After identifying the **IVR** verification and verifying the account, if it is determined that the customer must be transferred to another queue:

- Enter the **Agent Transfer Notes** as outlined in the [Basic Call Scripts QRC](#).
- The **Verified Status, Verified Data**, and the **Operating Company** must be reviewed. If you have verified the account in full and need to make adjustments to reflect for the next Agent.
  - Select the drop down in each section and change as needed.
- Select **Submit**.

**Note: Fast Track IVR Unknown Agents ONLY**, utilize [Call Taking - Transfer to Internal Queue - Fast Track IVR Unknown Job Aid](#).



## Interpreter

Offer an interpreter if a customer requests one or a communication barrier exists:

- Place the customer on **Hold**.
- Select **Transfer/Conf**.
- Select **Interpreter Services**.
- Select **Call** to initiate the **Conference**.
- Select the dial pad to make the appropriate language selection.

After speaking with the interpreter, select **Conference** to connect to the customer with the interpreter on the line. By selecting **Conference**, the customer is removed from **Hold** and now all parties can speak together.

After helping the customer and the interpreter is no longer needed, select "**End Conference**".

## Conference Consult or Announce Transfer

Utilize the Job Aid [Call Taking - Conference Consult or Announce Transfer](#) for step-by-step instructions without video.

When needing to consult with another department or when the call must be transferred but you need to talk to the new party first:

- Type in the full number in the **Address Book** field.

- Select **Call**.

Speak to the party as needed and select **Hang Up** after you receive the answers you need and return to the customer. Select **Transfer** or **Conference** if the receiving party is ready for the phone call.

*Note: If the number is inaccurate, **Max Agent** advises “**Bad Number**”.*

## Transfer to External Vendors

Utilize the Job Aid [Call Taking - Transfer to External Vendor](#) for step-by-step instructions without video.

- Document in **CRM** when applicable.
- Return to **Max Agent** and select the **Transfer/Conf** button and search “**XT**” to locate the external transfer numbers:
  - **Credit Card**
  - **IBEX** (Connections)
  - **Wellington**
  - **Products** (Consumer Products)
- Select **Call** for the **External Vendor**.
- After selecting **Call**, select **Transfer**.

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY  
IN PENNSYLVANIA Set IV, No. 2**

“Are the data outlined in FE PA Exhibit No. MSK-4 calculated based solely on residential customers? If the answer is no or in the negative, please provide the calculations set forth in Exhibit No. MSK-4, for all residential customers.”

**RESPONSE:**

The data in FE PA Exhibit No. MSK-4 included all customers, of which approximately 98% are residential.

See FE PA Response to CAUSE-PA Interrogatory Set IV, No. 2, Attachment A for a calculation limited to only residential customers. The calculated reconnect charge does not change from the charge presented in FE PA Exhibit No. MSK-4.

	<b>All Customers</b>	<b>Residential</b>
<b>Total reconnects (Oct 22 - Sep 23)</b>	<b>54,891</b>	<b>53,611</b>
<b>Care Center Reconnection Cost</b>		
% of repeat calls	26%	26.2%
Credit AHT	69,196	67,681
Agent cost per minute	7:05	7:02
Agent cost per second	\$1.23	\$1.23
Cost per credit call	\$0.02	\$0.02
	\$8.68	\$8.62
Cost per reconnect	\$10.94	\$10.88
<b>Cost per Tech Billing employee per Exception</b>		
RMR1 EMMA cases (Oct 22 - Sep 23)*	1,406	1,353
Exception AHT	8:11	8:11
Biller Fully Loaded hourly cost	\$26.79	\$26.79
Biller cost per minute	\$0.45	\$0.45
Biller cost per second	\$0.007	\$0.007
Cost per exception	\$3.65	\$3.65
<i>*Please note that AHT data is not available as a breakdown by account class. The process for RMR1 cases is the same regardless of account class and a variation in AHT would not be expected.</i>		
<b>Reconnects (Oct 22 -Sep 23)</b>		
Total UBDNs (dunning unblock at meter)	915	779
Total MRUPs (dunning reconnect at pole)	37	26
% Requiring Manual Unblock	1.7%	1.5%
Cost per Manual Unblock	\$ 25.51 \$ 0.44	\$ 25.51 \$ 0.38
<b>Total Reconnect Charge</b>	<b>\$15.00</b>	<b>\$15.00</b>

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**OFFICE OF CONSUMER ADVOCATE Set I, No. 1**

“In Excel format, if available, please provide for each year 2019 to the present (YTD) inclusive each filing with the Bureau of Consumer Services or with the PUC generally providing universal service and collections data. If not available in Excel format, provide in that format which is available. Provide for FirstEnergy as a whole and for each operating Company, Met-Ed, Penelec, Penn Power and West Penn Power (hereafter, “operating Company”).”

**RESPONSE:**

See FE PA Response to OCA Interrogatory Set I, No. 1 Attachments A - Z and Attachment AA.

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>Collection Reporting</b>								
1. Total Number(#) - Payment Arrangements	36,440	19,984	33,659	20,243	8,128	4,589	34,811	19,293
2. Total Number(#) - Successful Payment Arrangements	13,564	5,450	11,350	5,141	2,884	1,143	12,677	5,129
3. Annual Collection Operating Expenses (\$)	\$16,176,996	\$11,093,910	\$17,262,640	\$12,930,731	\$4,392,483	\$3,145,270	\$15,760,119	\$10,965,005
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$13,479,716	\$9,634,780	\$15,042,797	\$11,623,055	\$3,617,934	\$2,707,733	\$13,446,408	\$9,721,573
5. Total Dollar Amount(\$) Net Residential Write-offs Recoveries	\$11,707,312	\$8,488,093	\$12,814,204	\$9,971,444	\$3,031,594	\$2,241,165	\$10,981,808	\$7,959,652
6. Total Number (#) Residential Customers - By Month:								
January	517,308	60,256	501,295	75,536	149,454	16,774	632,675	66,142
February	517,593	60,834	501,328	76,166	149,479	16,868	632,814	66,741
March	517,761	61,276	501,388	76,529	149,557	16,964	632,931	67,556
April	517,446	60,870	500,939	76,059	149,507	16,924	632,486	67,174
May	517,647	61,035	500,515	75,844	149,496	16,770	632,401	67,261
June	517,869	61,006	500,337	75,643	150,364	16,931	632,398	67,179
July	518,004	60,953	500,270	75,539	149,573	16,653	632,632	66,978
August	518,222	60,890	500,361	75,340	149,595	16,604	632,798	66,961
September	518,432	60,974	500,276	75,323	149,584	16,535	632,652	66,833
October	518,675	61,077	500,459	75,457	149,722	16,590	633,085	67,080
November	519,313	61,355	500,980	76,019	149,930	16,735	633,681	67,732
December	519,719	61,907	501,154	76,644	149,958	16,862	634,023	68,405
7.A. Total Number (#) Residential Accounts in Arrears on Agreements - By Month:								
January	21,439	12,398	21,399	13,452	5,399	3,304	22,162	12,710
February	21,434	12,471	21,375	13,450	5,423	3,280	22,296	12,884
March	21,977	12,617	21,876	13,606	5,484	3,265	22,823	13,104
April	22,664	12,773	22,654	13,928	5,662	3,348	23,741	13,464
May	22,647	12,772	22,346	13,609	5,551	3,271	23,554	13,327
June	22,809	12,910	22,553	13,770	5,569	3,269	23,621	13,349
July	22,881	12,972	22,873	14,079	5,576	3,290	23,567	13,410
August	23,040	13,012	23,012	14,188	5,579	3,261	23,541	13,442
September	23,323	13,106	23,223	14,301	5,638	3,318	23,785	13,492
October	23,530	13,161	23,273	14,217	5,668	3,316	23,811	13,449
November	23,602	13,169	23,239	14,237	5,628	3,316	23,710	13,486
December	23,489	13,216	23,187	14,297	5,611	3,337	23,601	13,598
7.B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month:								
January	33,395	17,909	38,088	22,276	8,993	5,069	38,386	20,247
February	31,931	17,620	35,648	21,443	8,528	4,938	36,871	19,775
March	30,819	16,781	33,947	20,175	8,148	4,612	34,663	18,693
April	33,605	16,577	36,169	20,034	8,836	4,636	37,411	18,327
May	31,914	16,060	34,538	19,314	8,276	4,434	35,102	17,678
June	33,297	16,665	36,325	19,956	8,579	4,549	37,031	18,412
July	30,446	16,069	33,681	19,417	8,008	4,429	31,887	17,279
August	29,692	16,123	33,138	19,208	7,881	4,378	33,863	18,018
September	31,944	16,645	34,247	19,381	8,353	4,482	35,674	18,322
October	30,515	15,933	32,894	18,629	7,828	4,240	34,757	17,725
November	33,396	17,149	35,621	19,888	8,537	4,542	37,575	18,695
December	35,614	18,605	38,781	22,021	9,261	5,027	40,231	20,650
8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month								
January	\$21,174,107	\$13,805,455	\$24,478,511	\$16,834,782	\$7,114,603	\$4,793,741	\$24,820,191	\$16,191,354
February	\$21,924,617	\$14,368,705	\$25,146,276	\$17,365,186	\$7,261,220	\$4,884,469	\$25,770,733	\$16,898,935
March	\$22,623,354	\$14,693,050	\$25,657,929	\$17,574,877	\$7,360,410	\$4,871,720	\$26,592,031	\$17,429,846
April	\$22,535,744	\$14,308,165	\$25,676,486	\$17,287,535	\$7,511,347	\$4,979,609	\$26,604,467	\$17,212,254
May	\$21,199,843	\$13,484,923	\$23,762,031	\$15,869,476	\$6,783,741	\$4,449,411	\$24,799,220	\$15,969,594
June	\$21,401,201	\$13,555,236	\$23,545,105	\$15,606,883	\$6,667,638	\$4,299,133	\$24,487,521	\$15,704,868
July	\$20,841,118	\$13,328,710	\$23,558,665	\$15,706,684	\$6,514,405	\$4,163,841	\$23,540,402	\$15,293,745
August	\$20,274,227	\$12,909,703	\$23,178,409	\$15,547,574	\$6,257,809	\$4,025,405	\$23,165,830	\$14,943,672
September	\$20,075,661	\$12,689,355	\$22,737,399	\$15,184,837	\$6,105,990	\$3,896,633	\$22,656,736	\$14,553,153
October	\$19,433,651	\$12,317,818	\$22,140,596	\$14,778,286	\$5,907,413	\$3,798,287	\$21,759,384	\$13,917,632
November	\$20,191,485	\$12,851,478	\$22,821,285	\$15,340,943	\$5,987,072	\$3,847,179	\$22,297,636	\$14,346,888
December	\$21,734,469	\$13,848,734	\$24,565,092	\$16,573,488	\$6,431,078	\$4,199,236	\$24,028,618	\$15,612,827
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month								
January	\$12,319,843	\$9,745,284	\$14,393,499	\$11,473,512	\$3,788,465	\$3,009,646	\$14,041,975	\$11,088,109
February	\$12,970,873	\$10,352,069	\$14,935,388	\$12,146,088	\$3,861,211	\$3,133,480	\$14,793,497	\$11,704,969
March	\$12,983,159	\$10,390,656	\$14,761,533	\$12,047,096	\$3,800,296	\$3,031,180	\$14,641,523	\$11,715,091
April	\$12,298,013	\$9,284,122	\$14,129,222	\$11,010,132	\$3,741,130	\$2,885,008	\$14,008,079	\$10,708,659
May	\$10,932,506	\$8,440,894	\$12,433,160	\$9,797,521	\$3,239,138	\$2,581,053	\$12,126,251	\$9,513,486
June	\$11,109,467	\$8,475,453	\$12,388,587	\$9,690,805	\$3,125,675	\$2,448,153	\$12,157,634	\$9,355,218
July	\$10,631,566	\$8,313,042	\$11,975,426	\$9,582,560	\$3,075,239	\$2,415,162	\$11,134,027	\$8,901,999
August	\$10,476,639	\$8,330,522	\$11,779,494	\$9,460,668	\$2,971,904	\$2,369,523	\$11,398,629	\$9,027,425
September	\$10,843,795	\$8,405,418	\$11,875,353	\$9,454,873	\$2,988,028	\$2,334,783	\$11,432,983	\$8,865,199
October	\$9,827,912	\$7,838,217	\$11,321,603	\$9,103,289	\$2,753,304	\$2,195,903	\$11,019,231	\$8,697,726
November	\$11,130,322	\$8,595,562	\$12,544,696	\$9,869,709	\$3,082,403	\$2,397,492	\$12,224,446	\$9,316,205
December	\$12,857,091	\$9,810,778	\$14,706,137	\$11,382,924	\$3,547,382	\$2,758,328	\$14,063,450	\$10,608,417
9. Total Number(#) Residential Payment Troubled Customers - By Month:								
January	228	104	185	96	50	28	197	89
February	266	146	218	126	52	30	247	146
March	338	197	280	157	80	48	299	155
April	958	616	858	554	191	127	813	498
May	1,043	662	974	659	258	171	996	628
June	762	476	748	504	190	122	764	496
July	857	555	764	518	200	131	874	549
August	930	581	793	565	194	136	809	541
September	866	697	684	473	214	141	732	463
October	981	621	819	548	207	127	816	535
November	503	305	386	264	83	51	408	246
December	244	133	189	99	40	27	228	105

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>10. Total Number(#) Terminations - By Month:</b>								
January	315	43	275	42	36	7	261	45
February	346	56	301	51	58	8	237	33
March	475	69	237	39	32	2	332	40
April	3,269	1,975	2,210	1,357	340	202	2,428	1,377
May	3,639	2,053	3,181	2,065	736	496	3,232	1,868
June	2,701	1,362	2,423	1,368	364	202	2,291	1,172
July	2,653	1,526	1,910	1,181	465	289	2,389	1,362
August	3,597	1,952	2,479	1,542	558	340	2,689	1,546
September	3,326	1,780	2,442	1,438	553	322	2,324	1,247
October	4,869	2,400	3,505	1,993	748	382	3,237	1,639
November	1,210	569	354	200	115	56	542	313
December	272	42	62	10	1	0	226	24
<b>11. Total Number(#) Reconnections - By Month: * from "Reconnection Calculation" tab</b>								
January	251	41	168	39	22	6	169	42
February	267	51	175	50	39	5	161	34
March	349	67	150	32	22	3	211	39
April	2,626	1,348	1,630	856	237	118	1,831	864
May	3,215	1,532	2,369	1,263	545	287	2,498	1,200
June	2,404	1,031	2,023	978	305	148	1,900	849
July	2,307	1,148	1,424	735	369	183	1,874	906
August	3,182	1,487	1,991	1,042	445	203	2,203	1,031
September	2,931	1,338	2,015	1,011	439	223	1,887	862
October	4,239	1,805	2,844	1,359	599	264	2,704	1,155
November	1,252	494	484	226	131	51	571	245
December	179	44	55	22	1	0	129	28
<b>12. Total Number(#) Low Income Households (Accounts) (Estimated)</b>								
		109,115		145,179		34,400		147,803
<b>12B. Annual Residential Revenues (\$)</b>								
	\$856,272,371	\$129,540,835	\$735,510,855	\$145,163,737	\$245,784,528	\$33,231,319	\$906,438,333	\$123,518,353
<b>Program Reporting</b>								
<b>LIURP</b>								
<b>13. Program Costs (\$)/Actual Spending for the Year Just Completed</b>								
		\$5,592,286		\$8,385,580		\$3,014,163		\$7,962,013
<b>14. Number of Family Members Under Age 18</b>								
		1.50		1.10		1.10		1.00
<b>15. Number of Family Members Over Age 62</b>								
		0.30		0.40		0.40		0.50
<b>16. Family Size</b>								
		3.50		3.00		2.90		2.80
<b>17. Income (\$)</b>								
		\$26,058		\$23,814		\$22,193		\$22,540
<b>18. Source of Income</b>								
Employment		572		840		208		403
Public Assistance		26		51		35		25
Pension/Retirement		93		343		72		202
Unemployment Compensation		52		62		24		25
Disability		155		429		86		260
Other (includes Missing Data)		130		190		59		128
<b>19. Participation Levels By Month (#) - Reporting Year:</b>								
<b>Heating Jobs:</b>								
January		22		17		8		25
February		33		31		5		32
March		32		35		9		26
April		25		17		8		18
May		22		29		6		21
June		47		19		15		25
July		22		9		13		19
August		26		18		6		24
September		33		39		5		31
October		18		18		11		19
November		27		17		16		22
December		26		24		9		30
<b>Water Heating Jobs:</b>								
January		21		43		8		27
February		26		64		3		21
March		45		123		13		62
April		20		53		5		23
May		16		77		8		43
June		41		115		17		52
July		26		53		6		28
August		37		82		14		44
September		46		122		13		67
October		37		101		11		37
November		41		84		28		51
December		19		102		20		38
<b>Baseload Jobs:</b>								
January		13		31		11		20
February		35		34		24		14
March		29		68		18		26
April		17		23		22		10
May		14		51		14		26
June		40		61		28		29
July		24		21		15		20
August		29		70		6		17
September		36		105		26		37
October		38		45		25		31
November		30		63		23		21
December		14		52		15		21
<b>20. Projected Spending for the Current Year - (\$)</b>								
		\$11,570,726		\$8,746,716		\$5,043,831		\$11,151,400
<b>21. Projected Annual Production Number (#) - Current Year</b>								
Heating Jobs		601		313		146		378
Water Heating Jobs		528		937		202		629
Baseload Jobs		376		485		253		292
<b>22. Average Job Costs (\$)</b>								
Heating Jobs		\$6,401		\$5,607		\$8,620		\$8,578
Water Heating Jobs		\$3,866		\$3,611		\$3,748		\$6,234
Baseload Jobs		\$3,917		\$2,621		\$3,237		\$4,701

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>CAP</b>								
23. Program Costs - Administration (\$)		\$1,479,454		\$1,693,327		\$467,076		\$1,510,872
24. Program Costs - CAP Credits (\$)		\$25,838,432		\$30,485,418		\$7,241,920		\$26,321,140
25. Program Costs - Preprogram Arrearage Forgiveness (\$)		\$2,274,509		\$2,323,698		\$601,789		\$2,662,618
Program Costs - CAP Accounts in Arrears - (\$):								
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)								
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)								
Program Costs - CAP Accounts in Arrears - (#):								
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)								
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)								
28. Number of Family Members Under Age 18		1.13		0.84		0.84		0.81
29. Number of Family Members Over Age 18		0.22		0.26		0.28		0.26
30. Family Size		2.75		2.39		2.35		2.36
31. Income (\$)		\$ 15,335		\$ 14,861		\$ 14,417		\$ 14,354
32. Source of Income								
Employment		8,061		9,338		2,029		7,568
Public Assistance		189		416		77		282
Pension/Retirement		3,712		6,281		1,414		5,260
Unemployment Compensation		790		864		244		839
Disability		6,890		12,127		2,684		9,740
Other (includes Missing Data)		8,401		7,990		2,054		8,109
33. Participation Levels By Month - Income at or below 50% of Poverty (#): (3)								
January		7,612		8,313		2,066		7,935
February		7,432		8,161		2,017		7,756
March		7,603		8,317		2,039		7,906
April		7,786		8,465		2,072		8,100
May		8,139		8,859		2,185		8,515
June		8,437		9,169		2,253		8,738
July		8,497		9,175		2,254		8,739
August		8,508		9,260		2,264		8,834
September		8,654		9,358		2,254		8,974
October		8,636		9,323		1,921		8,999
November		8,362		8,973		1,761		8,662
December		7,907		8,521		1,762		8,185
34. Participation Levels by Month - Income between 51% and 100% of Poverty (#): (3)								
January		7,931		12,387		2,768		10,345
February		7,780		12,217		2,732		10,181
March		7,902		12,344		2,761		10,280
April		8,015		12,465		2,794		10,409
May		8,222		12,846		2,899		10,682
June		8,352		13,066		2,926		10,820
July		8,378		13,039		2,928		10,808
August		8,365		13,010		2,924		10,812
September		8,446		13,049		2,908		10,833
October		8,362		12,973		2,675		10,772
November		8,138		12,578		2,517		10,534
December		7,971		12,294		2,496		10,329
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#): (3)								
January		5,704		8,212		1,965		6,762
February		5,610		8,142		1,932		6,667
March		5,792		8,329		1,981		6,898
April		5,934		8,499		2,002		7,066
May		5,538		7,885		1,798		6,565
June		5,581		7,893		1,822		6,617
July		5,616		7,922		1,831		6,642
August		5,661		7,969		1,843		6,677
September		5,779		8,095		1,856		6,756
October		5,791		8,179		1,766		6,821
November		5,724		8,069		1,724		6,724
December		5,674		8,006		1,732		6,602
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)		1,236		1,263		655		1,259
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)		896		1,333		549		1,088
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)		687		839		332		720
39. Participation Level: Exists other than Defaults (#)		378		414		97		421
40. Energy Assistance Benefits (\$)		\$ 2,928,018		\$ 3,687,570		\$ 993,248		\$ 3,938,439
41. Energy Assistance Benefits (#)		5,237		6,736		1,827		7,203
42. Number of Full CAP Payments by Month:								
January		12,441		18,881		4,419		15,725
February		12,662		19,133		4,444		15,710
March		12,288		18,910		4,371		15,520
April		13,098		19,908		4,523		15,962
May		13,159		19,797		4,551		16,137
June		12,962		19,454		4,492		15,982
July		12,919		19,328		4,483		16,299
August		13,411		19,678		4,538		15,686
September		12,999		19,324		4,471		15,784
October		13,039		19,506		4,442		16,027
November		13,128		19,374		4,096		15,917
December		12,650		18,749		3,867		15,430
CAP Benefits:								
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)		\$25,170,691		\$29,292,568		\$6,219,520		\$25,120,635
44. Total Number of CAP Bills Rendered by Month (#):								
January		20,734		28,116		6,128		23,783
February		20,406		27,792		5,962		23,545
March		20,664		28,334		6,136		23,965
April		20,200		27,591		5,620		22,800
May		21,283		28,920		6,275		24,265
June		21,403		29,111		6,213		24,582
July		21,580		29,162		5,708		23,915
August		21,808		29,384		7,051		25,246
September		20,996		28,610		5,709		24,735
October		22,510		30,157		6,688		25,418
November		22,430		29,814		5,667		25,508
December		22,358		29,887		6,030		26,066

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income	All Residential	Confirmed Low Income	All Residential	Confirmed Low Income	All Residential	Confirmed Low Income
45. Total Cash Payments by CAP Customers (\$)		\$19,685,098		\$22,338,346		\$5,331,062		\$19,708,979
46. Number of Full, On-Time Payments (#): <i>payment rate</i>		122,328		193,251		44,290		158,210
<b>CARES</b>								
47. Program Costs (\$) (5)		\$3,986		\$680		\$912		\$1,666
48. Number of Family Members Under Age 18								
49. Number of Family Members Over Age 62								
50. Family Size								
51. Income (\$)								
52. Source of Income: Employment Public Assistance Pension/Retirement Unemployment Compensation Disability Other (includes Missing Data)								
53. Participation Levels By Month:								
January		7		0		21		0
February		14		28		7		0
March		35		49		21		77
April		14		42		0		42
May		14		35		0		35
June		21		14		0		35
July		21		21		14		28
August		56		105		63		112
September		96		96		24		132
October		40		52		12		52
November		20		36		16		40
December		44		52		48		48
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)		\$2,100		\$4,902		\$3,150		\$8,363
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		6		10		7		16
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)		\$1,574		\$8,545		\$5,157		\$11,571
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		4		11		5		11
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (Total)		\$ 4,488,701		\$ 6,202,335		\$ 1,457,140		\$ 6,881,887
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (Total)		8,485		11,534		2,712		12,650
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (Total)		\$ 1,933,661		\$ 3,223,708		\$ 863,582		\$ 2,860,219
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (Total)		2,720		5,091		1,303		4,538
62. Direct Dollars Applied to CARES Accounts (\$)		\$3,814		\$13,547		\$8,429		\$20,336
63. Direct Dollars Applied to CARES Accounts (#)		11		22		13		29
64. CARES Benefits (#) - Number of Customers Referred to CARES		382		530		226		601
65. CARES Benefits (#) - Number of Customers Accepted into CARES		382		530		226		601
<b>Hardship Fund</b>								
66. Program Costs (Administrative Costs Only): Administrative Costs from Rate Base (\$) Administrative Costs from Shareholders (\$)		\$31,901		\$20,405		\$10,989		\$29,224
67. Number of Family Members Under Age 18		1.42		1.18		1.15		1.19
68. Number of Family Members Over Age 62		0.15		0.20		0.28		0.27
69. Family Size		3.09		2.83		2.80		2.86
70. Income (\$)		\$20,003		\$20,056		\$20,090		\$19,861
71. Source of Income: Employment Public Assistance Pension/Retirement Unemployment Compensation Disability Other (includes Missing Data)		449 1 67 6 80 107		281 3 49 4 59 55		123 2 34 1 36 31		374 1 95 8 73 72
72. Participation Levels By Month (#):								
October		140		122		38		134
November		65		52		17		49
December		4		6		5		5
January		3		1		0		3
February		0		1		0		0
March		109		103		32		165
April		276		166		92		247
May		81		0		33		20
June		32		0		1		0
July		0		0		3		0
August		0		0		5		0
September		0		0		1		0
73. Ratepayer/Employee Contributions (\$)		\$115,833		\$69,827		\$34,103		\$132,178
74. Special Contributions (\$): Citizens Energy Corporation Companies Other Than Utilities Settlements and Fines Other		\$ - \$ - \$ - \$ -		\$ - \$ - \$ - \$ -		\$ - \$ - \$ - \$ -		\$ - \$ - \$ - \$ -
75. Utility Contributions (\$) - Initial grant (excluding admin. and grants dependent on ratepayer match)								
76. Utility Contributions (\$) - (excluding #66 and #75)		\$115,833		\$69,827		\$34,103		\$105,422
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$115,833		\$69,827		\$34,103		\$105,422
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) (6) (This is a separate list)								
Hardship Fund Benefits:								
79. Cash Benefits (#)		710		451		227		623
80. Cash Benefits (\$)		\$248,642		\$146,000		\$83,056		\$218,000
(5) CARES data indicated with response of "-1" is result of approval of the Company's 3-year Universal Service Plan-included with CAP								

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>Collection Reporting</b>								
1. Total Number(#) - Payment Arrangements	31,462	17,513	28,734	17,688	6,927	4,180	28,818	16,095
2. Total Number(#) - Successful Payment Arrangements	11,650	4,922	9,724	4,839	2,342	1,019	10,755	4,592
3. Annual Collection Operating Expenses (\$)	\$17,345,552	\$11,952,760	\$17,283,876	\$12,785,857	\$4,394,359	\$3,057,937	\$16,640,374	\$11,579,292
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$14,650,554	\$10,495,428	\$15,056,177	\$11,474,569	\$3,627,804	\$2,627,240	\$14,287,659	\$10,325,774
5. Total Dollar Amount(\$) Net Residential Write-offs Recoveries	\$12,821,788	\$9,301,594	\$12,595,348	\$9,663,656	\$3,040,665	\$2,224,376	\$11,769,228	\$8,491,846
6. Total Number (#) Residential Customers - By Month:								
January	514,433	56,775	501,978	71,304	148,790	16,045	633,496	61,245
February	514,584	57,483	502,052	72,119	148,867	16,182	633,583	62,081
March	514,702	58,009	501,862	72,846	148,878	16,355	633,668	62,761
April	514,507	57,734	501,464	72,754	148,813	16,347	633,363	62,730
May	514,547	57,869	500,740	72,737	148,797	16,317	630,907	62,705
June	514,775	57,998	500,522	72,669	148,786	16,295	630,784	62,769
July	514,854	57,964	500,078	72,477	148,725	16,231	630,275	62,635
August	515,200	58,261	500,209	72,842	148,820	16,295	630,708	63,368
September	515,635	58,567	500,454	73,074	148,966	16,357	631,175	63,737
October	516,014	58,733	500,629	73,288	149,122	16,368	631,556	63,973
November	516,585	59,017	500,988	73,741	149,232	16,471	632,085	64,474
December	516,874	59,678	501,125	74,806	149,328	16,657	632,277	65,403
7.A. Total Number (#) Residential Accounts in Arrears on Agreements - By Month:								
January	19,582	11,633	20,703	13,277	5,229	3,317	20,617	12,455
February	19,666	11,736	20,633	13,276	5,195	3,316	20,591	12,531
March	20,221	11,933	20,983	13,536	5,302	3,363	21,041	12,743
April	21,188	12,160	21,722	13,932	5,502	3,458	21,787	12,936
May	21,492	12,285	21,758	13,883	5,562	3,490	21,851	12,914
June	21,486	12,291	21,668	13,806	5,490	3,428	21,727	12,755
July	21,510	12,316	21,680	13,791	5,454	3,392	21,680	12,696
August	21,198	12,187	21,357	13,523	5,383	3,311	21,512	12,544
September	21,720	12,434	21,778	13,697	5,464	3,354	22,272	12,861
October	22,073	12,509	21,924	13,702	5,486	3,369	22,602	12,839
November	22,072	12,498	21,813	13,507	5,475	3,323	22,487	12,760
December	21,823	12,476	21,681	13,513	5,446	3,342	22,362	12,725
7.B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month:								
January	32,918	17,076	37,329	20,870	8,983	4,664	38,466	19,299
February	31,456	16,862	35,878	20,520	8,663	4,597	36,867	19,033
March	32,064	16,713	35,063	19,842	8,646	4,543	37,257	18,542
April	31,175	15,873	33,412	18,660	8,065	4,257	34,740	17,421
May	30,328	15,507	33,316	18,458	8,012	4,189	34,223	17,209
June	29,304	15,346	32,272	18,298	7,826	4,133	33,690	17,180
July	31,634	16,195	34,551	19,237	8,444	4,343	35,454	17,720
August	28,679	15,009	31,292	17,486	7,540	3,944	31,713	15,917
September	30,473	15,638	33,529	18,363	8,234	4,217	34,636	16,769
October	30,493	15,455	32,827	18,168	8,219	4,200	34,052	16,697
November	31,067	15,813	33,139	18,704	8,372	4,417	34,919	17,316
December	34,199	17,552	38,088	21,388	9,421	4,972	39,414	19,615
8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month								
January	\$26,982,824	\$18,309,849	\$31,690,383	\$22,276,445	\$8,567,445	\$5,932,357	\$33,647,092	\$22,879,410
February	\$27,334,108	\$18,607,829	\$32,101,738	\$22,648,865	\$8,697,476	\$6,072,467	\$33,998,199	\$23,310,630
March	\$27,458,082	\$18,636,504	\$32,094,967	\$22,778,577	\$8,708,416	\$6,078,579	\$34,200,729	\$23,437,314
April	\$25,239,404	\$16,587,807	\$29,810,897	\$21,088,450	\$8,239,898	\$5,668,701	\$31,571,827	\$21,681,184
May	\$23,653,241	\$15,504,380	\$27,822,052	\$19,571,744	\$7,804,543	\$5,350,839	\$29,298,883	\$19,650,104
June	\$22,434,920	\$14,625,018	\$26,301,155	\$18,384,268	\$7,335,828	\$4,999,760	\$27,359,802	\$18,319,865
July	\$21,585,547	\$13,960,712	\$25,412,616	\$17,747,619	\$7,141,044	\$4,780,066	\$26,968,316	\$17,248,421
August	\$19,658,979	\$12,761,960	\$23,580,053	\$16,394,927	\$6,606,641	\$4,405,298	\$23,686,942	\$15,661,543
September	\$19,382,212	\$12,510,135	\$22,805,962	\$15,664,318	\$6,532,384	\$4,327,366	\$23,263,629	\$15,354,025
October	\$18,966,507	\$12,183,771	\$22,093,031	\$15,073,017	\$6,390,486	\$4,242,571	\$22,593,769	\$14,620,815
November	\$18,894,409	\$12,051,672	\$22,034,616	\$14,891,347	\$6,434,027	\$4,250,435	\$22,612,905	\$14,555,935
December	\$20,198,358	\$12,991,144	\$23,316,830	\$15,850,049	\$6,852,287	\$4,571,504	\$23,869,583	\$15,425,785
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month								
January	\$11,278,939	\$9,010,260	\$12,734,709	\$10,106,585	\$3,417,150	\$2,633,776	\$13,571,699	\$10,549,311
February	\$11,617,082	\$9,512,531	\$13,158,798	\$10,589,441	\$3,500,963	\$2,754,735	\$14,122,980	\$11,211,375
March	\$12,184,737	\$9,837,567	\$13,426,558	\$10,850,393	\$3,631,605	\$2,882,234	\$14,342,270	\$11,322,109
April	\$10,777,617	\$8,644,275	\$11,840,250	\$9,551,759	\$3,124,562	\$2,514,775	\$12,502,810	\$10,004,976
May	\$9,903,326	\$7,940,691	\$11,128,384	\$8,845,201	\$2,965,638	\$2,394,716	\$11,504,669	\$9,236,197
June	\$9,335,479	\$7,617,572	\$10,715,448	\$8,771,507	\$2,819,439	\$2,301,007	\$10,944,931	\$8,863,019
July	\$9,927,597	\$7,905,304	\$11,051,240	\$8,840,572	\$2,914,251	\$2,315,842	\$11,231,841	\$8,884,164
August	\$9,086,225	\$7,470,316	\$10,078,344	\$8,222,668	\$2,741,135	\$2,256,058	\$10,302,385	\$8,328,896
September	\$9,686,523	\$7,696,259	\$10,681,726	\$8,505,397	\$2,997,319	\$2,357,074	\$11,016,619	\$8,601,697
October	\$9,467,698	\$7,501,043	\$10,408,812	\$8,361,946	\$2,991,476	\$2,313,034	\$10,684,637	\$8,440,003
November	\$9,710,752	\$7,685,971	\$10,730,603	\$8,537,092	\$3,093,515	\$2,388,271	\$10,947,273	\$8,554,421
December	\$11,389,116	\$8,834,738	\$12,992,399	\$10,160,088	\$3,592,305	\$2,748,879	\$13,000,119	\$9,980,661
9. Total Number(#) Residential Payment Troubled Customers - By Month:								
January	153	90	128	66	34	16	139	71
February	169	78	150	86	36	22	150	74
March	444	239	368	240	84	44	347	181
April	1,121	703	923	586	279	185	928	555
May	934	612	885	605	228	153	908	559
June	736	463	671	465	166	122	716	437
July	708	454	621	437	143	102	614	421
August	845	552	744	506	203	144	757	496
September	781	479	633	400	155	105	671	431
October	705	454	564	388	137	87	630	384
November	537	335	463	293	102	65	453	288
December	211	103	203	103	48	29	182	81
10. Total Number(#) Terminations - By Month:								
January	108	18	97	29	2	0	97	24
February	568	109	218	30	45	10	328	52

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
March	611	88	639	101	156	21	510	83
April	4,166	2,259	2,645	1,532	501	256	2,595	1,431
May	4,048	2,201	3,511	2,140	544	358	3,239	1,810
June	3,988	1,991	2,977	1,693	471	283	3,276	1,656
July	3,164	1,627	2,554	1,502	399	250	2,503	1,390
August	4,224	2,190	3,182	1,842	521	290	3,251	1,705
September	3,644	1,751	1,978	1,107	307	153	2,148	1,104
October	2,768	1,378	1,772	1,009	137	85	2,217	1,086
November	1,259	665	812	518	114	59	757	360
December	268	50	103	22	47	5	100	15
11. Total Number(#) Reconnections - By Month: * from "Reconnection Calculation" tab								
January	80	17	70	26	1	0	73	22
February	410	100	127	27	25	9	193	47
March	432	87	364	89	78	17	311	77
April	3,515	1,596	1,987	966	366	160	1,992	912
May	3,564	1,651	2,678	1,334	404	197	2,561	1,133
June	3,470	1,445	2,394	1,116	358	173	2,628	1,085
July	2,900	1,209	2,089	1,028	315	167	2,084	975
August	3,728	1,613	2,531	1,160	440	198	2,690	1,096
September	3,332	1,361	1,699	795	266	107	1,896	829
October	2,481	1,092	1,463	693	107	49	1,903	770
November	1,272	564	798	407	93	34	739	278
December	205	52	78	25	20	7	78	21
12. Total Number(#) Low Income Households (Accounts) (Estimated)								
		108,952		146,158		34,435		149,900
12B. Annual Residential Revenues (\$)								
	\$731,079,749	\$105,665,641	\$636,217,593	\$120,867,637	\$218,958,897	\$28,823,742	\$783,519,557	\$101,240,256
<b>Program Reporting</b>								
LIURP								
13. Program Costs (\$)/Actual Spending for the Year Just Completed								
		\$5,996,087		\$6,835,496		\$3,213,204		\$7,493,636
14. Number of Family Members Under Age 18								
		1.37		1.13		0.99		0.83
15. Number of Family Members Over Age 62								
		0.28		0.33		0.34		0.42
16. Family Size								
		3.42		2.93		2.70		2.55
17. Income (\$)								
		\$21,205		\$21,125		\$19,396		\$18,823
18. Source of Income								
Employment		448		726		229		337
Public Assistance		61		17		58		17
Pension/Retirement		101		256		107		167
Unemployment Compensation		83		49		35		17
Disability		143		405		128		257
Other (includes Missing Data)		102		244		56		168
19. Participation Levels By Month (#) - Reporting Year:								
Heating Jobs:								
January		17		12		6		5
February		21		16		9		7
March		58		42		12		29
April		25		13		3		19
May		18		21		6		29
June		47		30		32		16
July		10		10		6		21
August		21		17		15		15
September		49		34		10		29
October		11		11		10		26
November		21		23		13		26
December		46		22		11		22
Water Heating Jobs:								
January		13		46		12		15
February		14		64		10		25
March		46		126		27		56
April		19		56		12		30
May		23		42		13		39
June		51		123		29		50
July		26		35		9		32
August		23		64		26		34
September		49		139		16		73
October		10		58		17		37
November		29		46		23		27
December		32		123		23		45
Baseload Jobs:								
January		9		20		22		6
February		19		27		18		20
March		31		50		47		40
April		15		37		12		20
May		9		19		10		13
June		30		66		32		29
July		16		29		11		17
August		16		42		19		18
September		34		84		17		40
October		7		34		24		10
November		26		38		28		15
December		47		78		23		28
20. Projected Spending for the Current Year - (\$)								
		\$6,749,970		\$9,239,377		\$4,590,891		\$7,096,660
21. Projected Annual Production Number (#) - Current Year								
Heating Jobs		407		380		193		297
Water Heating Jobs		358		1,135		267		494
Baseload Jobs		255		588		335		229
22. Average Job Costs (\$)								
Heating Jobs		\$6,771		\$4,619		\$7,672		\$9,329
Water Heating Jobs		\$4,206		\$3,911		\$3,307		\$5,806
Baseload Jobs		\$4,015		\$2,241		\$2,797		\$3,948
<b>CAP</b>								
23. Program Costs - Administration (\$)								
		\$1,608,582		\$1,987,290		\$492,919		\$1,672,737
24. Program Costs - CAP Credits (\$)								
		\$2,455,630		\$26,275,990		\$6,507,795		\$21,888,097
25. Program Costs - Preprogram Arrearage Forgiveness (\$)								
		\$2,553,683		\$2,598,243		\$640,717		\$2,947,123

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
Program Costs - CAP Accounts in Arrears - (\$):								
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)								
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)								
Program Costs - CAP Accounts in Arrears - (#):								
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)								
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)								
28. Number of Family Members Under Age 18		1.14		0.85		0.84		0.83
29. Number of Family Members Over Age 62		0.21		0.26		0.28		0.25
30. Family Size		2.74		2.38		2.32		2.37
31. Income (\$)		\$ 14,559		\$ 14,186		\$ 13,813		\$ 13,879
32. Source of Income								
Employment		7,319		8,649		1,733		6,963
Public Assistance		215		421		88		303
Pension/Retirement		4,070		6,861		1,617		5,617
Unemployment Compensation		1,210		1,166		281		1,111
Disability		6,196		10,907		2,341		8,875
Other (includes Missing Data)		7,796		7,496		1,838		7,576
33. Participation Levels By Month - Income at or below 50% of Poverty (#): (3)								
January		7,352		7,781		1,760		7,523
February		7,565		8,003		1,858		7,669
March		7,742		8,218		1,920		7,865
April		7,846		8,322		1,925		7,994
May		7,812		8,273		1,919		7,951
June		7,989		8,496		1,983		8,161
July		8,095		8,607		2,020		8,184
August		8,167		8,692		2,057		8,312
September		8,298		8,900		2,113		8,519
October		8,293		8,924		2,121		8,513
November		7,914		8,604		2,104		8,256
December		7,703		8,407		2,092		8,007
34. Participation Levels by Month - Income between 51% and 100% of Poverty (#): (3)								
January		8,394		12,841		2,707		10,571
February		8,475		13,024		2,726		10,687
March		8,572		13,075		2,746		10,785
April		8,540		13,048		2,743		10,760
May		8,427		12,918		2,723		10,621
June		8,531		13,094		2,739		10,733
July		8,537		13,047		2,745		10,715
August		8,553		13,019		2,756		10,760
September		8,651		13,167		2,776		10,876
October		8,586		13,073		2,773		10,822
November		8,239		12,762		2,799		10,613
December		8,010		12,505		2,790		10,405
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#): (3)								
January		5,671		8,053		1,868		6,909
February		5,753		8,124		1,848		6,931
March		5,726		8,105		1,850		6,888
April		5,720		8,119		1,854		6,953
May		5,664		8,046		1,844		6,890
June		5,812		8,281		1,891		7,011
July		5,835		8,307		1,911		7,006
August		5,872		8,345		1,930		7,041
September		5,874		8,288		1,910		6,991
October		5,871		8,317		480		6,998
November		5,627		8,049		1,931		6,770
December		5,612		8,076		1,953		6,712
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)		1,157		1,199		116		1,084
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)		1,162		1,442		126		1,177
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)		878		1,002		120		882
39. Participation Level: Exists other than Defaults (#)		3,197		3,643		362		3,143
40. Energy Assistance Benefits (\$)		\$ 3,453,637		\$ 4,463,523		\$ 1,304,647		\$ 4,716,039
41. Energy Assistance Benefits (#)		4,917		6,803		1,939		6,938
42. Number of Full CAP Payments by Month:								
January		13,307		19,434		4,215		16,252
February		13,467		19,652		4,246		16,338
March		13,070		19,568		4,162		15,965
April		14,092		20,779		4,480		17,180
May		13,981		20,707		4,535		17,247
June		13,989		20,414		4,403		16,874
July		13,767		20,225		4,407		16,720
August		13,819		20,228		4,417		16,748
September		13,825		20,329		4,491		16,634
October		14,130		20,660		4,614		17,393
November		13,829		20,397		4,529		16,994
December		13,010		19,392		4,516		16,310
CAP Benefits:								
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)		\$21,038,533		\$23,093,805		\$5,099,490		\$19,147,391
44. Total Number of CAP Bills Rendered by Month (#):								
January		19,784		26,791		5,531		23,392
February		20,448		27,540		5,447		23,022
March		21,366		28,532		5,693		23,882
April		21,126		28,484		5,672		23,715
May		21,914		29,156		5,898		24,374
June		21,891		29,331		5,755		24,385
July		21,831		29,068		5,814		24,264
August		22,490		30,026		6,197		24,900
September		22,408		29,901		5,962		24,754
October		22,509		29,909		6,158		25,026
November		22,591		30,046		6,132		24,983
December		21,822		29,398		6,848		25,616
45. Total Cash Payments by CAP Customers (\$)		\$16,607,416		\$18,352,515		\$4,243,950		\$15,305,789
46. Number of Full, On-Time Payments (#):		131,190		204,232		44,932		166,810
payment rate								
CARES								
47. Program Costs (\$ (5)		\$773		\$1,662		\$566		\$636
48. Number of Family Members Under Age 18								
49. Number of Family Members Over Age 62								
50. Family Size								
51. Income (\$)								

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
52. Source of Income: Employment Public Assistance Pension/Retirement Unemployment Compensation Disability Other (includes Missing Data)								
53. Participation Levels By Month:								
January		354		433		70		373
February		235		285		63		248
March		0		2		0		1
April		0		2		0		3
May		2		5		2		3
June		4		4		0		0
July		2		8		3		0
August		1		2		0		2
September		0		2		2		2
October		1		5		0		5
November		0		1		0		2
December		0		1		0		3
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)		\$55,403		\$80,732		\$21,960		\$94,102
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		77		116		33		122
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)		\$17,821		\$28,577		\$5,131		\$24,662
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		29		47		10		37
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (Total)		\$ 6,645,353		\$ 9,555,388		\$ 2,402,015		\$ 10,127,974
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (Total)		9,024		13,394		3,374		13,745
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (Total)		\$ 1,072,769		\$ 2,075,176		\$ 628,430		\$ 1,863,719
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (Total)		1,944		4,114		1,137		3,516
62. Direct Dollars Applied to CARES Accounts (\$)		\$75,873		\$111,117		\$27,091		\$121,073
63. Direct Dollars Applied to CARES Accounts (#)		116		168		43		166
64. CARES Benefits (#) - Number of Customers Referred to CARES		599		750		140		642
65. CARES Benefits (#) - Number of Customers Accepted into CARES		599		750		140		642
<b>Hardship Fund</b>								
66. Program Costs (Administrative Costs Only):								
Administrative Costs from Rate Base (\$)		\$29,456		\$19,597		\$9,526		\$27,286
Administrative Costs from Shareholders (\$)								
67. Number of Family Members Under Age 18		1.55		1.12		1.27		1.12
68. Number of Family Members Over Age 62		0.16		0.20		0.23		0.23
69. Family Size		3.20		2.82		2.93		2.79
70. Income (\$)		\$27,429		\$28,528		\$27,905		\$29,497
71. Source of Income:								
Employment		601		226		190		373
Public Assistance		4		5		2		2
Pension/Retirement		105		40		61		85
Unemployment Compensation		9		3		3		5
Disability		166		69		68		91
Other (includes Missing Data)		231		75		60		82
72. Participation Levels By Month (#):								
October		78		56		21		69
November		42		36		10		43
December		1		3		1		3
January		1		2		1		4
February		7		7		2		8
March		82		88		21		96
April		133		129		46		177
May		139		94		40		161
June		195		3		41		40
July		270		0		64		30
August		135		0		85		7
September		33		0		52		0
73. Ratepayer/Employee Contributions (\$)		\$114,531		\$70,717		\$35,177		\$130,119
74. Special Contributions (\$):								
Citizens Energy Corporation		\$ -		\$ -		\$ -		\$ -
Companies Other Than Utilities		\$ -		\$ -		\$ -		\$ -
Settlements and Fines		\$ -		\$ -		\$ -		\$ -
Other		\$ -		\$ -		\$ -		\$ -
75. Utility Contributions (\$) - Initial grant (excluding admin. and grants dependent on ratepayer match)								
76. Utility Contributions (\$) - (excluding #66 and #75)		\$114,531		\$70,717		\$35,120		\$107,010
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$114,531		\$70,717		\$35,120		\$107,010
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) (6) (This is a separate list)								
Hardship Fund Benefits:								
79. Cash Benefits (#)		1116		418		384		638
80. Cash Benefits (\$)		\$382,014		\$146,000		\$131,602		\$221,314
(5) CARES data indicated with response of "-1" is result of approval of the Company's 3-year Universal Service Plan-included with CAP								

54.75 and 62.5 Requirements	Met-Ed All Residential	Met-Ed Confirmed Low Income	Penelec All Residential	Penelec Confirmed Low Income	Penn Power All Residential	Penn Power Confirmed Low Income	West Penn Power All Residential	West Penn Power Confirmed Low Income
<b>Collection Reporting</b>								
1. Total Number(#) - Payment Arrangements	33,725	18,149	34,438	20,398	8,078	4,673	33,254	18,359
2. Total Number(#) - Successful Payment Arrangements	10,028	3,923	9,711	4,549	2,176	945	9,470	3,877
3. Annual Collection Operating Expenses (\$)	\$14,477,392	\$9,968,040	\$14,575,137	\$10,562,404	\$3,072,511	\$2,073,171	\$12,841,965	\$8,909,207
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$12,067,089	\$8,630,700	\$12,539,131	\$9,341,987	\$2,394,623	\$1,688,055	\$10,780,567	\$7,779,493
5. Total Dollar Amount(\$) Net Residential Write-offs Recoveries	\$8,936,654	\$6,440,889	\$9,057,758	\$6,616,283	\$1,640,530	\$1,132,702	\$7,507,380	\$5,414,093
6. Total Number (#) Residential Customers - By Month:								
January	511,122	58,766	502,549	73,494	147,657	16,264	632,161	64,221
February	511,342	59,339	502,737	74,204	147,823	16,421	632,324	64,847
March	511,707	59,732	502,649	74,986	147,906	16,535	632,525	65,291
April	511,964	59,665	502,327	74,902	147,959	16,521	632,590	65,248
May	511,636	59,069	501,676	74,276	147,964	16,423	632,247	64,833
June	511,946	58,875	501,504	73,863	148,069	16,393	632,432	64,490
July	511,957	58,824	501,330	73,725	148,104	16,325	631,949	64,126
August	512,462	58,933	501,577	73,725	148,240	16,275	632,520	63,972
September	512,649	59,001	501,132	73,855	148,329	16,299	632,297	64,004
October	512,645	59,123	501,059	73,997	148,363	16,384	632,185	64,228
November	513,420	51,273	501,607	65,056	148,567	14,668	632,818	55,240
December	513,743	52,743	501,643	66,915	148,672	15,124	632,933	56,819
7.A. Total Number (#) Residential Accounts in Arrears on Agreements - By Month:								
January	19,240	11,458	20,000	12,733	4,804	2,972	20,307	12,142
February	18,668	11,085	19,530	12,389	4,726	2,930	19,802	11,841
March	17,965	10,532	18,775	11,891	4,531	2,785	19,040	11,289
April	19,109	11,035	20,257	12,658	4,926	2,968	20,341	11,865
May	20,416	11,882	21,598	13,606	5,172	3,130	21,493	12,691
June	20,615	12,107	22,094	14,125	5,308	3,268	21,877	13,054
July	20,480	12,164	22,127	14,301	5,440	3,417	22,096	13,347
August	20,233	12,105	21,900	14,169	5,444	3,435	22,116	13,390
September	20,326	12,126	21,736	14,041	5,414	3,444	22,081	13,407
October	20,123	12,006	21,270	13,794	5,329	3,418	21,651	13,199
November	19,870	9,707	20,933	11,401	5,257	2,845	21,078	10,776
December	19,634	10,233	20,648	11,924	5,220	3,006	20,711	11,171
7.B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month:								
January	36,320	19,965	41,327	24,230	9,671	5,426	43,463	23,583
February	34,809	20,014	39,501	24,135	9,303	5,386	42,009	23,654
March	30,892	18,943	34,592	22,503	8,397	5,096	37,939	22,559
April	28,150	16,655	30,172	19,494	7,629	4,494	33,946	19,646
May	28,513	15,649	30,805	18,493	7,903	4,357	35,043	18,813
June	26,492	14,766	28,808	17,326	7,426	4,167	33,201	17,937
July	26,902	14,658	29,325	17,153	7,261	3,995	33,037	17,400
August	26,047	14,408	29,221	17,076	6,885	3,846	31,977	16,950
September	29,809	14,883	32,071	17,504	8,052	4,031	35,096	17,082
October	30,481	15,014	33,010	17,662	8,363	4,080	36,071	17,031
November	30,097	14,018	32,960	16,838	8,213	3,826	35,264	15,965
December	30,747	15,239	34,559	18,508	8,744	4,245	37,064	17,544
8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month								
January	\$26,504,127	\$18,029,937	\$30,657,831	\$21,699,811	\$7,466,678	\$5,202,661	\$32,427,104	\$21,975,002
February	\$26,476,361	\$18,049,004	\$30,881,697	\$21,926,155	\$7,529,923	\$5,273,907	\$32,581,776	\$22,186,857
March	\$25,446,904	\$17,406,816	\$29,442,538	\$21,085,381	\$7,193,147	\$5,050,867	\$31,170,590	\$21,313,330
April	\$26,964,655	\$18,045,344	\$31,331,595	\$21,915,867	\$7,775,064	\$5,305,287	\$32,767,796	\$21,879,740
May	\$28,962,567	\$19,317,814	\$33,199,588	\$23,282,973	\$8,343,604	\$5,575,523	\$34,757,385	\$23,131,085
June	\$29,777,238	\$20,011,157	\$34,064,191	\$24,093,680	\$8,579,111	\$5,801,987	\$35,469,942	\$23,814,580
July	\$29,767,816	\$20,258,848	\$34,343,881	\$24,571,431	\$8,648,299	\$5,916,824	\$35,936,033	\$24,410,335
August	\$28,473,702	\$19,495,155	\$33,168,347	\$23,718,727	\$8,564,469	\$5,902,080	\$35,218,642	\$24,023,259
September	\$28,227,220	\$19,211,885	\$32,559,122	\$23,219,034	\$8,602,558	\$5,941,946	\$34,906,856	\$23,962,223
October	\$26,876,688	\$18,285,239	\$31,126,316	\$22,123,591	\$8,419,180	\$5,856,375	\$33,604,754	\$23,042,420
November	\$25,917,615	\$15,142,832	\$30,158,760	\$18,784,182	\$8,187,331	\$4,956,719	\$32,594,612	\$19,655,215
December	\$26,149,325	\$16,189,402	\$30,521,605	\$19,996,611	\$8,357,615	\$5,298,940	\$32,858,763	\$20,641,240
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month								
January	\$19,861,430	\$15,553,952	\$23,011,306	\$18,115,424	\$5,585,153	\$4,183,764	\$23,722,690	\$18,226,782
February	\$20,374,296	\$16,169,472	\$23,701,996	\$18,889,973	\$5,737,284	\$4,344,307	\$24,430,527	\$18,958,105
March	\$19,384,678	\$15,911,101	\$22,001,648	\$18,271,558	\$5,512,355	\$4,301,381	\$23,334,343	\$18,593,817
April	\$15,825,888	\$13,232,459	\$17,536,079	\$15,006,356	\$4,523,943	\$3,653,568	\$19,075,206	\$15,542,883
May	\$11,276,656	\$9,236,692	\$12,957,492	\$10,886,389	\$3,703,540	\$2,969,976	\$15,155,001	\$12,008,662
June	\$8,932,546	\$7,389,760	\$10,358,565	\$8,672,641	\$3,110,478	\$2,528,664	\$12,844,695	\$10,191,655
July	\$8,383,834	\$6,873,028	\$9,340,169	\$7,781,160	\$2,711,258	\$2,197,617	\$11,388,844	\$8,930,073
August	\$7,936,965	\$6,526,129	\$9,044,032	\$7,528,487	\$2,445,740	\$2,019,569	\$10,598,474	\$8,369,321
September	\$8,716,445	\$6,833,333	\$9,503,264	\$7,674,837	\$2,731,925	\$2,107,531	\$10,961,355	\$8,351,513
October	\$8,901,736	\$6,965,220	\$9,634,196	\$7,699,895	\$2,726,542	\$2,072,684	\$10,985,864	\$8,366,726
November	\$9,176,913	\$7,020,290	\$9,940,298	\$7,682,841	\$2,803,692	\$2,046,083	\$11,236,202	\$8,339,538
December	\$9,977,993	\$7,897,516	\$11,095,608	\$8,799,559	\$3,063,423	\$2,305,350	\$12,360,546	\$9,402,158
9. Total Number(#) Residential Payment Troubled Customers - By Month:								
January	73	43	49	30	15	8	63	34
February	64	40	39	18	11	5	50	24
March	371	203	349	223	72	39	341	183
April	1,648	1,058	1,972	1,326	474	289	2,046	1,290
May	1,795	1,183	1,744	1,242	367	256	1,606	1,107
June	984	627	1,151	763	274	204	1,077	722
July	978	614	952	650	292	194	1,029	669
August	1,242	817	1,097	759	207	150	1,128	756
September	1,012	650	1,064	759	207	147	978	646
October	479	328	379	256	64	41	367	231
November	334	224	309	214	82	60	277	176
December	225	131	202	130	43	19	153	100
10. Total Number(#) Terminations - By Month:								
January	661	153	489	116	56	12	527	127
February	182	26	97	24	11	1	96	12
March	569	97	705	97	53	5	346	43

54.75 and 62.5 Requirements	Met-Ed All Residential	Met-Ed Confirmed Low Income	Penelec All Residential	Penelec Confirmed Low Income	Penn Power All Residential	Penn Power Confirmed Low Income	West Penn Power All Residential	West Penn Power Confirmed Low Income
April	2,965	1,255	2,623	1,169	286	60	1,443	524
May	4,353	2,701	3,340	2,344	275	181	1,947	1,286
June	3,362	1,769	3,273	2,044	400	209	2,159	1,300
July	2,733	1,450	1,946	1,206	452	286	2,178	1,239
August	3,833	1,990	2,669	1,594	278	168	2,719	1,500
September	2,672	1,353	1,985	1,128	206	118	1,871	973
October	3,694	1,427	2,058	983	227	104	1,914	814
November	1,592	697	872	433	130	89	732	321
December	325	78	297	70	42	15	215	44
11. Total Number(#) Reconnections - By Month: * from "Reconnection Calculation" tab								
January	384	147	0	109	35	15	274	127
February	136	29	54	23	2	1	60	13
March	405	99	369	97	31	5	198	46
April	2,544	979	1,978	833	215	42	1,111	364
May	3,754	2,014	2,553	1,560	207	118	1,499	867
June	3,041	1,373	2,684	1,449	298	127	1,651	836
July	2,493	1,130	1,595	836	355	192	1,771	878
August	3,433	1,580	2,152	1,128	208	110	2,254	1,056
September	2,408	1,095	1,663	832	152	77	1,583	705
October	3,456	1,389	1,743	849	186	93	1,643	729
November	1,541	556	842	342	124	62	689	251
December	247	76	194	70	31	14	149	41
12. Total Number(#) Low Income Households (Accounts) (Estimated)								
		109,201		146,334		34,284		150,562
12B. Annual Residential Revenues (\$)								
	\$652,803,005	\$89,899,507	\$582,846,673	\$104,939,383	\$195,167,327	\$24,298,379	\$669,041,945	\$83,103,083
<b>Program Reporting</b>								
<b>LIURP</b>								
13. Program Costs (\$)/Actual Spending for the Year Just Completed								
		\$5,760,936		\$6,046,027		\$3,122,296		\$6,941,354
14. Number of Family Members Under Age 18								
		1.37		1.21		1.08		0.74
15. Number of Family Members Over Age 62								
		0.30		0.30		0.27		0.39
16. Family Size								
		3.38		3.07		2.81		2.50
17. Income (\$)								
		\$22,383		\$20,770		\$19,504		\$18,557
18. Source of Income								
Employment		605		798		268		359
Public Assistance		91		35		55		34
Pension/Retirement		126		253		105		177
Unemployment Compensation		152		151		98		79
Disability		178		453		107		345
Other (includes Missing Data)		120		271		63		209
19. Participation Levels By Month (#) - Reporting Year:								
Heating Jobs:								
January		48		6		6		17
February		36		23		10		18
March		100		55		19		47
April		32		20		5		22
May		43		35		20		32
June		56		36		17		32
July		14		11		5		26
August		31		35		4		22
September		73		49		12		44
October		33		15		4		17
November		23		23		7		22
December		66		38		25		47
Water Heating Jobs:								
January		21		32		7		25
February		30		41		16		33
March		72		183		38		83
April		53		66		7		41
May		46		97		18		62
June		44		128		34		57
July		36		54		13		28
August		34		92		19		49
September		41		145		22		54
October		16		46		11		44
November		19		71		13		37
December		38		118		36		95
Baseload Jobs:								
January		20		16		13		16
February		16		26		17		10
March		36		78		57		32
April		26		34		14		17
May		30		30		26		20
June		33		56		36		21
July		18		25		13		15
August		21		55		17		20
September		23		80		28		19
October		17		31		21		18
November		5		33		30		16
December		22		78		56		45
20. Projected Spending for the Current Year - (\$)								
		\$6,284,233		\$8,816,414		\$4,539,320		\$7,075,716
21. Projected Annual Production Number (#) - Current Year								
Heating Jobs								
Water Heating Jobs		494		1,186		283		479
Baseload Jobs		389		653		370		204
22. Average Job Costs (\$)								
Heating Jobs		\$4,301		\$3,523		\$6,059		\$6,058
Water Heating Jobs		\$3,155		\$2,246		\$3,210		\$4,447
Baseload Jobs		\$2,988		\$1,894		\$2,358		\$3,776
<b>CAP</b>								
23. Program Costs - Administration (\$)								
		\$1,601,892		\$1,913,851		\$495,198		\$3,419,229
24. Program Costs - CAP Credits (\$)								
		\$18,291,791		\$21,816,555		\$5,226,516		\$16,472,954
25. Program Costs - Preprogram Arrearage Forgiveness (\$)								
		\$2,467,132		\$2,461,977		\$605,637		\$3,022,512
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)								

54.75 and 62.5 Requirements	Met-Ed All Residential	Met-Ed Confirmed Low Income	Penelec All Residential	Penelec Confirmed Low Income	Penn Power All Residential	Penn Power Confirmed Low Income	West Penn Power All Residential	West Penn Power Confirmed Low Income
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)								
Program Costs - CAP Accounts in Arrears - (#):								
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)								
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)								
28. Number of Family Members Under Age 18		1.15		0.84		0.80		0.83
29. Number of Family Members Over Age 62		0.23		0.28		0.30		0.27
30. Family Size		2.72		2.33		2.27		2.34
31. Income (\$)		\$ 14,651		\$ 14,227		\$ 14,028		\$ 14,015
32. Source of Income								
Employment		7,252		8,225		1,609		6,948
Public Assistance		230		500		103		328
Pension/Retirement		4,183		6,771		1,576		5,738
Unemployment Compensation		2,076		1,937		440		1,788
Disability		6,516		11,577		2,432		9,602
Other (includes Missing Data)		6,894		6,448		1,478		6,714
33. Participation Levels By Month - Income at or below 50% of Poverty (#): (3)								
January		6,043		6,124		1,373		6,128
February		6,212		6,323		1,412		6,265
March		6,325		6,429		1,449		6,379
April		6,385		6,539		1,456		6,554
May		6,346		6,541		1,467		6,553
June		6,367		6,583		1,481		6,582
July		6,404		6,644		1,474		6,590
August		6,446		6,688		1,481		6,649
September		6,634		6,816		1,512		6,768
October		6,866		7,131		1,577		7,075
November		7,062		7,391		1,647		7,266
December		7,202		7,614		1,712		7,361
34. Participation Levels by Month - Income between 51% and 100% of Poverty (#): (3)								
January		8,184		11,970		2,465		10,097
February		8,290		12,127		2,506		10,212
March		8,393		12,286		2,551		10,348
April		8,404		12,385		2,580		10,458
May		8,311		12,361		2,580		10,356
June		8,274		12,277		2,584		10,275
July		8,189		12,258		2,581		10,185
August		8,140		12,217		2,577		10,140
September		8,099		12,232		2,590		10,145
October		8,159		12,340		2,631		10,231
November		8,236		12,469		2,641		10,334
December		8,305		12,606		2,680		10,430
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#): (3)								
January		5,530		7,837		1,814		6,831
February		5,628		7,896		1,855		6,888
March		5,702		8,064		1,883		6,988
April		5,764		8,133		1,894		7,093
May		5,675		8,098		1,875		6,967
June		5,655		8,047		1,872		6,914
July		5,651		7,994		1,864		6,846
August		5,632		7,975		1,848		6,786
September		5,601		7,994		1,855		6,783
October		5,676		8,051		1,861		6,850
November		5,727		8,142		1,885		6,910
December		5,773		8,243		1,889		7,001
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)		576		674		150		691
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)		877		1,137		223		1,192
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)		875		1,019		240		1,148
38.b Participation Level: Default Exits - Blank		1						
39. Participation Level: Exists other than Defaults (#)		277		312		52		461
40. Energy Assistance Benefits (\$)		\$ 1,827,452		\$ 2,463,663		\$ 654,935		\$ 2,829,045
41. Energy Assistance Benefits (#)		4,251		5,513		1,483		6,395
42. Number of Full CAP Payments by Month:								
January		12,130		17,921		3,979		15,055
February		11,440		16,785		3,224		14,007
March		13,613		19,517		4,670		17,091
April		13,506		19,122		4,160		15,911
May		13,637		19,367		3,836		16,673
June		14,553		20,614		4,488		17,484
July		12,928		18,718		3,965		15,772
August		14,529		20,094		4,422		17,699
September		13,221		18,787		4,261		15,859
October		13,721		19,964		4,138		16,569
November		12,980		18,768		4,124		15,892
December		10,241		15,661		3,043		12,334
CAP Benefits:								
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)		\$14,956,654		\$16,521,937		\$3,852,351		\$13,773,582
44. Total Number of CAP Bills Rendered by Month (#):								
January		18,313		23,970		5,550		21,208
February		17,973		23,476		4,902		20,669
March		19,099		24,783		5,735		22,141
April		18,107		23,932		5,419		21,266
May		19,226		25,682		5,629		22,874
June		19,312		25,704		5,840		22,444
July		17,798		23,817		5,458		21,009
August		18,976		25,008		5,789		21,892
September		18,633		24,579		5,751		21,565
October		19,287		25,599		5,712		22,325
November		19,469		25,748		6,075		22,675
December		18,292		24,726		5,800		21,523
45. Total Cash Payments by CAP Customers (\$)		\$17,459,610		\$19,602,012		\$4,467,497		\$16,526,705
46. Number of Full, On-Time Payments (#):		112,858		186,511		40,494		157,257
payment rate								
CARES								
47. Program Costs (\$ (5)		\$168		\$323		\$180		\$168
48. Number of Family Members Under Age 18								
49. Number of Family Members Over Age 62								
50. Family Size								
51. Income (\$)								
52. Source of Income:								

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
Employment								
Public Assistance								
Pension/Retirement								
Unemployment Compensation								
Disability								
Other (includes Missing Data)								
53. Participation Levels By Month:								
January		577		701		121		619
February		482		513		102		453
March		462		556		114		557
April		495		618		133		642
May		394		550		107		521
June		493		657		121		547
July		461		531		176		418
August		450		514		138		499
September		189		188		29		156
October		430		531		114		508
November		463		554		99		428
December		398		503		126		482
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)		\$220,163		\$265,522		\$74,161		\$314,211
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		530		617		171		705
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)		\$105,601		\$168,287		\$46,376		\$174,665
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		189		324		88		315
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (Total)		\$ 2,829,262		\$ 4,290,102		\$ 1,003,078		\$ 4,760,533
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (Total)		7,008		9,968		2,346		11,204
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (Total)		\$ 803,737		\$ 1,287,871		\$ 340,885		\$ 1,302,474
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (Total)		1,525		2,590		653		2,539
62. Direct Dollars Applied to CARES Accounts (\$)		\$458,990		\$521,367		\$167,829		\$615,188
63. Direct Dollars Applied to CARES Accounts (#)		1042		1153		365		1320
64. CARES Benefits (#) - Number of Customers Referred to CARES		5294		6416		1380		5830
65. CARES Benefits (#) - Number of Customers Accepted into CARES		5294		6416		1380		5830
<b>Hardship Fund</b>								
66. Program Costs (Administrative Costs Only):								
Administrative Costs from Rate Base (\$)		\$28,957		\$21,234		\$11,130		\$29,380
Administrative Costs from Shareholders (\$)								
67. Number of Family Members Under Age 18		1.54		1.18		1.11		1.19
68. Number of Family Members Over Age 62		0.16		0.12		0.22		0.16
69. Family Size		3.09		2.80		2.71		2.77
70. Income (\$)		\$20,003		\$20,056		\$20,090		\$19,861
71. Source of Income:								
Employment		267		146		71		195
Public Assistance		5		2		1		5
Pension/Retirement		72		33		31		72
Unemployment Compensation		89		48		21		74
Disability		147		90		50		149
Other (includes Missing Data)		179		75		41		125
72. Participation Levels By Month (#):								
October		85		83		15		62
November		13		7		1		7
December		6		11		4		4
January		11		7		5		5
February		10		11		0		5
March		9		12		6		18
April		56		78		26		92
May		195		155		51		225
June		120		30		33		141
July		96		0		31		20
August		78		0		28		30
September		80		0		20		11
73. Ratepayer/Employee Contributions (\$)		\$118,207		\$74,929		\$36,610		\$137,835
74. Special Contributions (\$):								
Citizens Energy Corporation		\$ -		\$ -		\$ -		\$ -
Companies Other Than Utilities		\$ -		\$ -		\$ -		\$ -
Settlements and Fines		\$ 150,000		\$ -		\$ -		\$ -
Other		\$ -		\$ -		\$ -		\$ -
75. Utility Contributions (\$) - Initial grant (excluding admin. and grants dependent on ratepayer match)								
76. Utility Contributions (\$) - (excluding #66 and #75)		\$118,207		\$74,929		\$36,385		\$106,305
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$118,207		\$74,929		\$36,385		\$106,305
78. Outreach Contacts (Name of Agency, Address and Telephone # by County ) (6) (This is a separate list)								
Hardship Fund Benefits:								
79. Cash Benefits (#)		759		394		215		620
80. Cash Benefits (\$)		\$275,781		\$112,351		\$82,090		\$241,728
(5) CARES data indicated with response of "-1" is result of approval of the Company's 3-year Universal Service Plan-included with CAP								

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>Collection Reporting</b>								
1. Total Number(#) - Payment Arrangements	25,161	14,257	23,699	14,310	5,683	3,272	24,260	13,578
2. Total Number(#) - Successful Payment Arrangements	8,727	3,714	7,323	3393	1,748	761	7,747	3,191
3. Annual Collection Operating Expenses (\$)	\$12,916,942	\$9,403,191	\$13,276,426	\$10,200,878	\$3,137,598	\$2,316,253	\$12,947,688	\$9,383,596
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$10,590,500	\$8,106,239	\$11,281,446	\$8,992,717	\$2,406,621	\$1,897,416	\$11,035,112	\$8,341,292
5. Total Dollar Amount(\$) Net Residential Write-offs	\$7,916,636	\$6,225,603	\$8,393,182	\$6,841,143	\$1,826,721	\$1,483,188	\$8,522,902	\$6,746,447
6. Total Number (#) Residential Customers - By Month:								
January	507,218	75,160	501,147	92,838	146,555	20,427	628,787	76,271
February	507,230	75,340	500,963	93,170	146,606	20,503	628,785	76,595
March	507,747	75,934	501,119	93,687	146,716	20,667	629,019	77,426
April	507,820	76,739	501,226	94,370	146,780	20,825	629,060	78,160
May	507,945	76,914	501,038	94,434	146,823	20,778	629,133	78,312
June	508,426	76,925	501,303	94,410	146,947	20,779	629,538	78,304
July	508,802	76,848	501,671	94,411	147,081	20,797	629,892	78,356
August	509,112	76,749	501,865	94,328	147,166	20,799	630,498	78,303
September	509,584	76,694	502,103	94,200	147,257	20,801	630,898	78,301
October	509,829	76,512	502,068	94,238	147,290	20,821	631,079	78,290
November	510,498	55,921	502,457	70,468	147,470	15,662	631,705	61,228
December	510,831	57,530	502,651	72,063	147,547	15,963	632,062	62,978
7.A. Total Number (#) Residential Accounts in Arrears on Agreements - By Month:								
January	19,472	12,911	21,634	15,402	4,967	3,427	22,137	14,475
February	19,252	12,767	21,276	15,157	4,930	3,388	21,909	14,312
March	19,298	12,890	20,920	14,943	4,838	3,357	21,785	14,480
April	18,755	12,878	20,016	14,637	4,623	3,261	21,130	14,430
May	17,857	12,380	18,793	13,806	4,381	3,106	19,889	13,685
June	20,929	14,440	21,692	15,897	5,088	3,628	22,041	15,242
July	20,123	13,853	20,654	15,080	4,877	3,491	21,201	14,626
August	19,369	13,289	20,049	14,553	4,732	3,381	20,504	14,117
September	19,384	13,104	19,983	14,298	4,768	3,339	20,457	13,813
October	19,110	12,624	19,889	13,957	4,775	3,272	20,257	13,416
November	19,341	11,284	20,168	12,828	4,873	2,998	20,492	12,133
December	19,453	11,442	20,338	12,849	4,868	2,992	20,656	12,273
7.B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month:								
January	27,951	12,768	32,647	16,577	7,674	3,684	34,166	14,725
February	28,779	12,716	32,670	16,113	7,574	3,616	33,461	14,083
March	27,511	11,468	30,124	14,568	7,217	3,209	32,541	13,100
April	27,855	11,282	28,792	13,656	7,293	3,153	32,340	12,617
May	28,475	11,316	29,053	13,492	7,273	3,024	32,525	12,236
June	33,791	18,125	36,389	21,414	8,464	4,578	40,263	21,158
July	34,156	18,596	37,524	22,270	8,691	4,736	41,141	22,015
August	35,712	19,412	39,548	23,443	9,060	4,939	42,680	22,872
September	36,141	19,813	40,072	23,874	9,318	5,095	43,515	23,304
October	36,646	20,643	40,378	24,699	9,594	5,356	44,489	24,118
November	36,839	18,294	40,107	22,069	9,340	4,927	44,222	21,647
December	37,872	19,614	43,360	23,850	10,019	5,283	45,547	23,149
8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month								
January	\$13,670,738	\$9,681,310	\$16,491,472	\$12,164,482	\$4,183,109	\$2,953,836	\$16,265,786	\$11,398,444
February	\$14,497,373	\$10,287,739	\$17,268,782	\$12,760,903	\$4,434,139	\$3,136,316	\$17,186,171	\$12,086,955
March	\$15,226,705	\$10,868,096	\$17,738,369	\$13,174,894	\$4,504,091	\$3,238,138	\$17,772,424	\$12,669,369
April	\$15,353,566	\$11,226,380	\$17,639,928	\$13,424,683	\$4,422,052	\$3,223,342	\$17,848,380	\$13,023,306
May	\$14,924,783	\$10,978,990	\$17,211,939	\$13,134,186	\$4,351,724	\$3,189,079	\$17,362,307	\$12,664,539
June	\$23,781,080	\$17,744,267	\$26,786,087	\$20,698,922	\$6,587,794	\$4,999,088	\$29,062,987	\$21,768,777
July	\$21,619,406	\$16,216,306	\$24,249,681	\$18,768,508	\$6,080,847	\$4,645,151	\$26,890,218	\$20,189,164
August	\$22,266,325	\$16,600,698	\$25,272,953	\$19,387,825	\$6,293,072	\$4,789,898	\$27,681,847	\$20,576,808
September	\$22,844,049	\$16,853,826	\$26,145,670	\$19,827,715	\$6,392,210	\$4,790,911	\$28,452,655	\$20,860,723
October	\$23,520,926	\$17,018,955	\$27,247,499	\$20,391,784	\$6,713,086	\$4,965,929	\$29,498,592	\$21,246,707
November	\$26,825,144	\$17,384,538	\$30,692,117	\$21,275,636	\$7,540,878	\$5,101,891	\$32,608,854	\$21,473,529
December	\$25,799,679	\$17,140,208	\$29,914,151	\$20,851,660	\$7,286,809	\$4,962,830	\$31,764,849	\$21,257,181
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month								
January	\$8,557,226	\$4,678,149	\$9,863,347	\$5,802,031	\$2,500,771	\$1,405,643	\$10,309,585	\$5,530,652
February	\$9,686,729	\$5,327,764	\$10,854,977	\$6,441,248	\$2,778,319	\$1,577,977	\$11,327,137	\$6,112,904
March	\$10,047,021	\$5,371,237	\$10,840,733	\$6,405,213	\$2,758,043	\$1,502,104	\$11,430,884	\$6,114,713
April	\$10,394,101	\$5,506,632	\$10,742,998	\$6,327,682	\$2,768,451	\$1,515,509	\$11,479,914	\$6,076,205
May	\$10,443,048	\$5,540,272	\$10,840,536	\$6,383,656	\$2,698,813	\$1,471,981	\$11,435,033	\$6,050,845
June	\$17,770,140	\$12,069,901	\$19,153,426	\$13,839,497	\$4,511,824	\$3,069,283	\$20,751,296	\$14,325,746
July	\$15,318,386	\$11,088,045	\$16,751,057	\$12,820,759	\$3,971,968	\$2,878,843	\$18,193,068	\$13,395,815
August	\$16,679,379	\$12,027,655	\$18,175,987	\$13,837,171	\$4,287,264	\$3,074,734	\$19,637,177	\$14,388,514
September	\$17,083,415	\$12,398,189	\$18,881,934	\$14,388,668	\$4,579,361	\$3,290,207	\$20,411,780	\$14,964,778
October	\$18,361,921	\$13,379,752	\$20,349,970	\$15,579,662	\$4,937,100	\$3,543,229	\$21,884,150	\$15,970,951
November	\$22,544,477	\$14,563,390	\$24,764,672	\$16,990,942	\$5,939,197	\$3,932,932	\$26,039,327	\$17,124,408
December	\$19,903,590	\$14,366,221	\$22,712,539	\$16,830,390	\$5,460,981	\$3,890,209	\$23,556,560	\$17,006,375
9. Total Number(#) Residential Payment Troubled Customers - By Month:								
January	233	140	182	119	54	30	228	110
February	256	157	216	140	68	48	248	154
March	367	263	315	226	101	76	338	233
April	309	239	307	238	106	83	306	221
May	550	389	492	376	122	85	595	428
June	317	229	261	188	81	61	340	238
July	406	284	432	316	110	79	451	281
August	672	462	659	439	145	97	677	423
September	936	582	879	570	237	142	872	553
October	491	314	500	319	117	72	494	294
November	491	256	553	327	129	79	485	258
December	82	44	71	40	19	9	75	38
10. Total Number(#) Terminations - By Month:								
January	294	37	322	38	74	13	334	56
February	197	21	221	26	44	5	253	31
March	192	20	191	19	29	5	187	19
April	0	0	0	0	0	0	0	0
May	0	0	0	0	0	0	0	0
June	0	0	0	0	0	0	0	0

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All	Confirmed	All	Confirmed	All	Confirmed	All	Confirmed
	Residential	Low Income	Residential	Low Income	Residential	Low Income	Residential	Low Income
July	0	0	0	0	0	0	0	0
August	0	0	0	0	0	0	0	0
September	0	0	0	0	0	0	0	0
October	0	0	0	0	0	0	0	0
November	0	0	0	0	0	0	0	0
December	71	16	25	7	3	1	22	7
11. Total Number(#) Reconnections - By Month: * from "Reconnection Calculation" tab								
January	193	33	172	31	33	11	220	49
February	135	23	130	21	27	6	156	25
March	113	19	111	19	17	4	114	15
April	9	2	17	7	0	0	9	1
May	3	1	3	0	0	0	2	2
June	0	0	4	1	0	0	3	1
July	3	1	2	0	1	1	4	1
August	4	0	7	2	0	0	2	1
September	3	0	5	2	2	0	3	1
October	0	0	3	2	0	0	4	0
November	1	1	5	3	0	0	0	0
December	21	15	21	10	4	2	19	7
12. Total Number(#) Low Income Households (Accounts) (Estimated)								
		113,660		151,836		35,146		154,975
12B. Annual Residential Revenues (\$)								
	\$609,398,255	\$92,996,158	\$570,011,917	\$111,220,802	\$187,558,506	\$25,422,264	\$679,260,398	\$90,556,779
<b>Program Reporting</b>								
<b>LIURP</b>								
13. Program Costs (\$)/Actual Spending for the Year Just Completed								
		5243891.00		4571159.00		2320305.00		5420587.00
14. Number of Family Members Under Age 18								
		1.18		1.12		0.86		0.73
15. Number of Family Members Over Age 62								
		0.31		0.33		0.40		0.41
16. Family Size								
		\$3		\$3		\$3		\$2
17. Income (\$)								
		22,044		19,666		17,484		18,782
18. Source of Income								
Employment		590		500		189		319
Public Assistance		26		33		54		12
Pension/Retirement		99		192		80		173
Unemployment Compensation		58		56		47		45
Disability		200		350		136		287
Other (Includes Missing Data)		137		194		65		160
19. Participation Levels By Month (#) - Reporting Year:								
Heating Jobs:								
January		20		24		22		23
February		61		19		5		28
March		94		62		28		59
April		10		12		4		14
May		1		3		1		3
June		2		5		2		4
July		8		9		2		13
August		21		18		9		35
September		77		29		21		31
October		23		19		2		25
November		49		19		20		20
December		78		42		26		50
Water Heating Jobs:								
January		24		59		15		17
February		35		66		11		47
March		44		132		36		76
April		2		24		8		7
May		1		20		0		4
June		4		29		0		9
July		6		25		9		16
August		23		60		11		32
September		50		93		29		76
October		26		57		9		28
November		114		39		20		46
December		63		123		39		104
Baseload Jobs:								
January		30		35		14		12
February		27		31		17		32
March		67		62		48		33
April		0		8		9		5
May		0		4		0		0
June		1		5		10		4
July		21		12		20		12
August		9		30		16		7
September		15		47		36		30
October		8		21		5		16
November		40		20		15		24
December		56		62		52		54
20. Projected Spending for the Current Year - (\$)								
		\$5,949,109		\$8,014,841		\$4,460,856		\$7,322,110
21. Projected Annual Production Number (#) - Current Year								
Heating Jobs								
		630		464		219		344
Water Heating Jobs								
		516		1,188		289		539
Baseload Jobs								
		404		678		357		212
22. Average Job Costs (\$)								
Heating Jobs								
		\$4,224		\$4,021		\$6,716		\$5,095
Water Heating Jobs								
		\$2,747		\$2,409		\$2,215		\$4,021
Baseload Jobs								
		\$2,523		\$1,990		\$1,823		\$3,207
<b>CAP</b>								
23. Program Costs - Administration (\$)								
		\$1,484,494		\$1,658,192		\$436,515		\$1,633,675
24. Program Costs - CAP Credits (\$)								
		\$14,226,455		\$17,373,847		\$3,997,054		\$15,505,565
25. Program Costs - Preprogram Arrearage Forgiveness (\$)								
		\$1,564,295		\$1,559,447		\$366,390		\$2,054,539
Program Costs - CAP Accounts in Arrears - (\$):								
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)								
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)								
Program Costs - CAP Accounts in Arrears - (#):								
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)								
27. B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)								
28. Number of Family Members Under Age 18								
		1.10		0.75		0.73		0.77

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
29. Number of Family Members Over Age 62		0.25		0.25		0.33		0.30
30. Family Size		2.65		2.22		2.18		2.26
31. Income (\$)		\$ 14,935		\$ 14,308		\$ 14,178		\$ 14,176
32. Source of Income								
Employment		5,716		6,130		1,192		5,314
Public Assistance		182		410		92		284
Pension/Retirement		3,728		5,984		1,377		5,020
Unemployment Compensation		1,524		1,394		302		1,322
Disability		5,976		10,420		2,188		8,684
Other (includes Missing Data)		5,560		5,176		1,160		5,451
33. Participation Levels By Month - Income at or below 50% of Poverty (#): (3)								
January		3,042		3,363		720		3,278
February		3,137		3,493		738		3,393
March		3,215		3,562		763		3,471
April		3,675		3,859		834		3,859
May		4,192		4,216		949		4,329
June		4,578		4,546		1,035		4,687
July		4,795		4,755		1,071		4,889
August		4,961		4,904		1,118		5,015
September		5,137		5,144		1,191		5,201
October		5,404		5,399		1,241		5,463
November		5,562		5,595		1,282		5,662
December		5,820		5,873		1,326		5,910
34. Participation Levels by Month - Income between 51% and 100% of Poverty (#): (3)								
January		5,952		9,027		1,869		7,463
February		6,025		9,157		1,912		7,547
March		6,142		9,282		1,958		7,626
April		6,326		9,483		1,984		7,857
May		6,564		9,737		2,039		8,196
June		6,822		10,086		2,120		8,555
July		6,983		10,316		2,168		8,745
August		7,152		10,508		2,191		8,908
September		7,296		10,690		2,241		9,114
October		7,607		11,125		2,323		9,453
November		7,720		11,411		2,370		9,670
December		8,022		11,770		2,431		9,945
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#): (3)								
January		4,346		6,263		1,446		5,270
February		4,402		6,335		1,457		5,329
March		4,444		6,375		1,484		5,388
April		4,502		6,510		1,501		5,506
May		4,687		6,657		1,542		5,671
June		4,800		6,829		1,587		5,861
July		4,919		6,940		1,607		5,999
August		4,971		6,987		1,637		6,048
September		5,027		7,032		1,654		6,154
October		5,217		7,260		1,690		6,370
November		5,315		7,425		1,738		6,515
December		5,468		7,702		1,789		6,736
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)		238		185		53		217
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)		530		399		103		514
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)		596		545		132		556
39. Participation Level: Exists other than Defaults (#)		238		227		38		305
40. Energy Assistance Benefits (\$)		\$ 1,344,483		\$ 1,756,333		\$ 465,997		\$ 2,150,111
41. Energy Assistance Benefits (#)		4,142		5,172		1,361		6,433
42. Number of Full CAP Payments by Month:								
January		8,175		12,475		2,850		9,601
February		7,098		11,400		2,105		8,334
March		8,086		12,745		2,838		10,113
April		8,365		12,942		3,078		9,914
May		8,376		12,983		2,728		10,380
June		8,649		13,370		3,047		10,755
July		10,274		14,870		3,628		12,487
August		8,729		13,130		2,998		11,068
September		8,222		12,407		2,811		10,252
October		8,788		13,379		3,049		10,753
November		8,164		12,602		2,747		11,198
December		8,186		12,679		2,964		10,833
CAP Benefits:								
43. Total Annual CAP Billed Amount - (used to calculate Average Cap Bills) (\$)		\$12,775,431		\$14,410,672		\$3,101,947		\$13,038,342
44. Total Number of CAP Bills Rendered by Month (#):								
January		13,248		18,587		4,015		15,932
February		12,660		18,002		3,836		15,460
March		13,803		19,256		4,189		16,501
April		14,065		19,447		4,244		16,787
May		14,259		19,460		4,291		16,807
June		15,730		20,919		4,592		17,848
July		16,501		21,842		4,717		19,345
August		16,236		21,312		4,812		18,868
September		16,325		21,382		4,708		18,132
October		17,083		22,315		4,850		19,089
November		17,646		23,005		5,141		20,615
December		17,915		23,427		5,396		20,804
45. Total Cash Payments by CAP Customers (\$)		\$10,185,982		\$11,779,628		\$2,578,384		\$10,832,257
46. Number of Full, On-Time Payments (#):		132,788		192,171		42,066		157,119
payment rate								
CARES								
47. Program Costs (\$) (5)		\$1,647		\$1,135		\$1,030		\$2,674
48. Number of Family Members Under Age 18								
49. Number of Family Members Over Age 62								
50. Family Size								
51. Income (\$)								
52. Source of Income:								
Employment		-1		-1		-1		-1
Public Assistance		-1		-1		-1		-1
Pension/Retirement		-1		-1		-1		-1
Unemployment Compensation		-1		-1		-1		-1
Disability		-1		-1		-1		-1
Other (includes Missing Data)		-1		-1		-1		-1

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
<b>53. Participation Levels By Month:</b>								
January		1		0		0		0
February		0		0		0		0
March		0		2		0		0
April		564		448		127		503
May		912		693		166		885
June		703		761		172		731
July		550		565		119		535
August		455		453		99		406
September		668		718		192		759
October		809		963		163		823
November		558		708		156		680
December		716		924		190		755
<b>54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)</b>								
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)		\$163,617		\$180,927		\$52,376		\$239,917
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		583		597		182		815
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)		\$247,183		\$298,986		\$90,462		\$372,710
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		485		636		172		744
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (Total)		\$ 2,017,980		\$ 2,956,413		\$ 699,190		\$ 3,431,404
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (Total)		7,388		9,885		2,328		11,586
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (Total)		\$ 1,272,841		\$ 1,924,607		\$ 576,388		\$ 2,150,917
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (Total)		2,679		4,250		1,228		4,552
62. Direct Dollars Applied to CARES Accounts (\$)		\$481,240		\$530,651		\$159,537		\$678,268
63. Direct Dollars Applied to CARES Accounts (#)		1264		1381		397		1737
64. CARES Benefits (#) - Number of Customers Referred to CARES		5936		6235		1384		6077
65. CARES Benefits (#) - Number of Customers Accepted into CARES		5936		6235		1384		6077
<b>Hardship Fund</b>								
66. Program Costs (Administrative Costs Only):								
Administrative Costs from Rate Base (\$)		\$52,263		\$41,080		\$25,274		\$55,636
Administrative Costs from Shareholders (\$)								
67. Number of Family Members Under Age 18		1.45		1.15		1.16		1.11
68. Number of Family Members Over Age 62		0.21		0.20		0.32		0.26
69. Family Size		3.06		2.77		2.76		2.80
70. Income (\$)		\$22,616		\$22,448		\$20,939		\$24,428
71. Source of Income:								
Employment		414		367		91		506
Public Assistance		5		9		3		7
Pension/Retirement		123		112		49		173
Unemployment Compensation		84		44		12		82
Disability		139		188		63		226
Other (includes Missing Data)		188		131		39		165
72. Participation Levels By Month (#):								
October		100		117		36		188
November		40		58		22		75
December		8		5		1		8
January		6		11		1		6
February		4		15		1		7
March		56		53		27		91
April		105		87		21		121
May		162		121		38		187
June		113		121		16		119
July		109		83		28		103
August		90		110		19		99
September		160		70		47		155
73. Ratepayer/Employee Contributions (\$)								
		\$120,352		\$73,506		\$37,114		\$142,820
74. Special Contributions (\$):								
Citizens Energy Corporation								
Companies Other Than Utilities								
Settlements and Fines								
Other								
75. Utility Contributions (\$) - Initial grant (excluding admin. and grants dependent on ratepayer match)								
76. Utility Contributions (\$) - (excluding #66 and #75)		\$120,352		\$73,506		\$37,114		\$108,089
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$120,352		\$73,506		\$37,114		\$108,089
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) (6) (This is a separate list)								
Hardship Fund Benefits:								
79. Cash Benefits (#)		953		851		257		1159
80. Cash Benefits (\$)		\$337,447		\$291,783		\$88,186		\$399,749
(5) CARES data indicated with response of "-1" is result of approval of the Company's 3-year Universal Service Plan-included with CAP								

54.75 and 62.5 Requirements	Met-Ed All Residential	Met-Ed Confirmed Low Income	Penelec All Residential	Penelec Confirmed Low Income	Penn Power All Residential	Penn Power Confirmed Low Income	West Penn Power All Residential	West Penn Power Confirmed Low Income
<b>Collection Reporting</b>								
1. Total Number(#) - Payment Arrangements	42,338	25,996	42,414	28,802	9,622	6,261	41,596	28,802
2. Total Number(#) - Successful Payment Arrangements	15,041	6,891	13,067	6935	2,887	1,344	12,915	5,694
3. Annual Collection Operating Expenses (\$)	\$17,588,515	\$12,918,584	\$17,499,436	\$13,681,322	\$4,199,273	\$3,150,075	\$18,310,785	\$13,406,453
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$14,939,366	\$11,582,626	\$15,212,941	\$12,405,094	\$3,448,167	\$2,754,306	\$16,109,498	\$12,362,585
5. Total Dollar Amount(\$) Net Residential Write-offs	\$12,513,788	\$9,924,247	\$12,589,339	\$10,364,215	\$2,967,359	\$2,395,937	\$13,698,180	\$10,663,872
6. Total Number (#) Residential Customers - By Month:								
January	503,960	73,362	502,040	91,997	145,842	20,334	627,824	74,288
February	504,145	73,880	502,099	92,150	145,896	20,453	627,962	74,734
March	504,132	74,069	501,984	92,282	145,935	20,473	627,975	75,001
April	504,096	73,937	501,635	92,100	145,958	20,382	627,865	74,750
May	503,947	73,604	500,687	91,400	145,926	20,253	627,079	74,060
June	503,926	73,472	500,087	90,939	145,910	20,151	626,766	73,799
July	504,269	73,358	500,150	90,781	145,938	20,108	626,816	73,657
August	504,370	73,217	499,794	90,416	145,931	20,063	626,580	73,391
September	504,991	73,307	500,042	90,339	146,039	20,063	627,176	73,494
October	505,454	73,282	500,261	90,526	146,124	19,991	627,451	73,657
November	506,183	73,712	500,754	91,135	146,292	20,103	628,085	74,206
December	506,737	74,559	500,991	92,139	146,418	20,276	628,405	75,395
7.A. Total Number (#) Residential Accounts in Arrears on Agreements - By Month:								
January	18,906	12,267	21,570	14,965	4,974	3,363	21,335	13,046
February	18,892	12,242	21,365	14,856	4,997	3,374	21,309	13,119
March	19,586	12,521	21,895	15,129	5,225	3,465	22,146	13,626
April	20,504	13,007	22,863	15,715	5,536	3,676	23,516	14,602
May	20,988	13,335	23,323	15,985	5,601	3,705	23,578	14,751
June	21,559	13,727	23,964	16,522	5,628	3,756	23,670	14,958
July	21,408	13,710	23,860	16,587	5,559	3,761	23,124	14,825
August	21,019	13,608	23,450	16,425	5,426	3,684	22,931	14,724
September	20,873	13,511	23,060	16,174	5,318	3,620	22,974	14,650
October	20,755	13,444	22,748	16,012	5,290	3,606	22,852	14,624
November	20,461	13,378	22,375	15,812	5,148	3,541	22,745	14,612
December	19,722	13,009	21,828	15,498	5,053	3,495	22,271	14,462
7.B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month:								
January	28,902	12,828	33,601	16,961	8,052	3,652	35,968	14,830
February	27,975	12,590	32,268	16,363	7,928	3,569	34,713	14,472
March	26,509	11,090	29,708	14,184	7,139	3,046	32,698	12,814
April	21,889	8,138	24,971	10,940	6,086	2,376	28,218	9,752
May	24,181	8,555	27,939	11,679	6,804	2,591	31,455	10,016
June	24,071	8,331	27,289	11,241	6,688	2,520	31,166	9,902
July	21,955	7,913	25,183	10,473	6,085	2,360	28,641	9,528
August	23,040	8,209	26,158	10,873	6,530	2,529	29,192	9,781
September	23,166	8,267	25,937	10,629	6,508	2,541	29,692	9,966
October	23,120	8,341	26,091	10,602	6,223	2,503	29,332	9,909
November	26,847	10,019	29,356	12,590	7,150	2,955	33,065	11,689
December	25,436	11,170	29,155	14,238	7,125	3,280	32,377	13,088
8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month								
January	\$13,789,648	\$9,619,706	\$16,878,633	\$12,315,764	\$4,278,472	\$3,015,736	\$15,162,541	\$9,946,112
February	\$14,814,347	\$10,339,232	\$17,901,232	\$13,055,622	\$4,537,830	\$3,189,966	\$16,190,895	\$10,722,950
March	\$15,272,868	\$10,429,305	\$18,069,769	\$13,016,922	\$4,690,023	\$3,210,759	\$16,680,062	\$10,895,131
April	\$14,777,738	\$9,831,440	\$17,529,017	\$12,462,253	\$4,644,549	\$3,102,487	\$16,551,664	\$10,795,556
May	\$14,232,303	\$9,451,664	\$16,891,366	\$11,921,185	\$4,463,036	\$2,962,462	\$15,837,085	\$10,387,023
June	\$14,022,742	\$9,384,610	\$16,687,104	\$11,884,469	\$4,335,935	\$2,912,278	\$15,623,863	\$10,474,213
July	\$13,600,280	\$9,160,539	\$16,353,370	\$11,653,749	\$4,246,808	\$2,853,694	\$15,127,782	\$10,318,932
August	\$13,024,263	\$8,891,736	\$15,474,524	\$11,110,771	\$4,116,920	\$2,791,271	\$14,757,511	\$10,015,729
September	\$12,538,754	\$8,590,042	\$14,826,419	\$10,688,039	\$3,864,451	\$2,631,648	\$14,381,439	\$9,708,406
October	\$12,320,396	\$8,489,467	\$14,519,336	\$10,484,420	\$3,725,176	\$2,542,680	\$14,082,196	\$9,532,998
November	\$12,015,976	\$8,345,555	\$14,231,449	\$10,369,303	\$3,671,480	\$2,525,860	\$14,146,916	\$9,661,190
December	\$12,807,574	\$9,004,449	\$15,363,422	\$11,258,233	\$3,972,190	\$2,772,058	\$15,263,479	\$10,531,686
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month								
January	\$9,220,462	\$4,871,581	\$10,949,519	\$6,374,604	\$2,918,585	\$1,525,010	\$11,720,326	\$6,166,790
February	\$10,287,556	\$5,607,861	\$11,999,451	\$7,227,439	\$3,212,109	\$1,722,661	\$12,677,471	\$6,866,499
March	\$9,589,510	\$5,092,263	\$10,804,256	\$6,398,836	\$2,809,300	\$1,492,901	\$11,646,794	\$6,232,957
April	\$6,709,784	\$3,189,671	\$7,859,403	\$4,329,088	\$1,998,506	\$985,268	\$8,549,862	\$4,027,377
May	\$5,810,976	\$2,652,809	\$6,777,836	\$3,497,114	\$1,804,479	\$832,595	\$7,808,593	\$3,348,370
June	\$4,893,186	\$2,229,587	\$5,789,154	\$2,938,715	\$1,573,810	\$728,224	\$7,073,349	\$2,973,483
July	\$4,755,539	\$2,171,838	\$5,532,151	\$2,724,998	\$1,488,606	\$684,719	\$6,786,212	\$2,844,989
August	\$5,235,443	\$2,253,253	\$5,843,639	\$2,798,557	\$1,653,740	\$743,240	\$7,004,316	\$2,828,522
September	\$5,492,551	\$2,367,717	\$5,893,954	\$2,783,207	\$1,639,842	\$735,134	\$7,206,475	\$2,891,678
October	\$5,495,121	\$2,401,022	\$5,938,659	\$2,824,797	\$1,627,090	\$759,469	\$7,101,689	\$2,913,916
November	\$5,756,564	\$2,601,873	\$6,208,225	\$3,142,198	\$1,781,397	\$876,680	\$7,616,997	\$3,338,996
December	\$6,777,848	\$3,515,772	\$7,737,323	\$4,341,218	\$2,113,576	\$1,138,811	\$8,824,035	\$4,384,183
9. Total Number(#) Residential Payment Troubled Customers - By Month:								
January	249	142	195	108	55	24	193	102
February	257	153	232	151	59	40	260	156
March	482	292	453	309	110	76	459	274
April	1,418	975	1,319	954	348	254	1,319	881
May	1,239	838	1,259	939	263	182	1,111	784
June	810	555	803	600	171	129	708	509
July	881	649	1,013	772	241	184	940	671
August	896	625	953	703	183	135	953	678
September	802	572	851	642	201	140	838	593
October	876	623	871	662	239	171	918	659
November	513	371	476	350	110	72	513	358
December	260	134	217	131	52	28	228	133
10. Total Number(#) Terminations - By Month:								
January	70	7	66	9	5	1	72	8
February	38	2	35	5	4	0	32	7

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
March	78	4	29	2	5	0	40	3
April	4,649	2,718	2,658	1,739	717	465	3,117	1,811
May	4,337	2,266	3,304	2,167	598	351	3,142	1,852
June	3,310	1,760	2,380	1,486	453	286	2,040	1,166
July	2,952	1,729	2,912	1,923	610	404	2,561	1,485
August	3,341	1,798	3,340	2,065	476	284	2,715	1,559
September	3,102	1,686	2,754	1,750	623	370	2,497	1,455
October	3,237	1,738	2,760	1,747	637	375	2,724	1,595
November	748	374	656	419	125	94	544	334
December	214	30	171	23	40	6	259	37
11. Total Number(#) Reconnections - By Month: * from "Reconnection Calculation" tab								
January	72	9	49	11	6	2	57	8
February	31	1	29	4	3	1	30	6
March	58	3	19	3	7	0	23	3
April	3,486	1,838	1,611	938	485	277	2,036	1,051
May	3,865	1,875	2,411	1,502	510	272	2,386	1,307
June	2,875	1,393	1,838	1,061	363	208	1,596	831
July	2,498	1,336	2,173	1,304	460	273	1,979	1,065
August	2,994	1,531	2,681	1,563	393	214	2,179	1,155
September	2,641	1,408	2,187	1,350	492	276	1,968	1,112
October	2,870	1,453	2,329	1,377	559	300	2,282	1,257
November	777	363	671	375	153	85	609	337
December	158	32	97	23	18	3	163	33
12. Total Number(#) Low Income Households (Accounts) (Estimated)								
		116,570		155,072		35,872		157,491
12B. Annual Residential Revenues (\$)								
	\$613,381,575	\$105,975,840	\$566,400,530	\$125,054,802	\$183,772,688	\$28,568,036	\$695,021,554	\$101,681,106
<b>Program Reporting</b>								
<b>LIURP</b>								
13. Program Costs (\$)/Actual Spending for the Year Just Completed								
		\$5,319,200		\$7,049,211		\$2,842,470		\$5,189,877
14. Number of Family Members Under Age 18								
		1.34		1.10		0.92		0.71
15. Number of Family Members Over Age 62								
		0.28		0.34		0.40		0.46
16. Family Size								
		3.21		2.85		2.57		2.33
17. Income (\$)								
		\$20,863		\$21,251		\$18,551		\$18,127
18. Source of Income								
Employment		802		899		300		358
Public Assistance		26		78		117		6
Pension/Retirement		151		331		87		201
Unemployment Compensation		30		55		30		28
Disability		276		630		208		264
Other (includes Missing Data)		223		385		133		300
19. Participation Levels By Month (#) - Reporting Year:								
Heating Jobs:								
January		8		19		2		5
February		27		29		17		15
March		38		51		22		46
April		23		30		8		17
May		21		57		17		40
June		115		62		35		45
July		27		24		6		16
August		31		30		16		36
September		136		46		33		45
October		16		35		12		16
November		34		32		14		23
December		120		66		31		63
Water Heating Jobs:								
January		9		43		7		20
February		68		89		19		39
March		62		197		37		103
April		35		47		5		23
May		24		62		19		51
June		53		181		53		67
July		38		64		8		37
August		36		92		25		38
September		64		160		41		51
October		19		59		18		26
November		30		80		14		19
December		72		162		39		88
Baseload Jobs:								
January		17		20		10		4
February		12		28		38		20
March		45		111		56		39
April		49		14		8		7
May		17		41		24		22
June		42		88		46		21
July		64		39		18		7
August		21		72		29		19
September		38		103		68		27
October		8		38		15		8
November		29		38		21		27
December		60		69		44		27
20. Projected Spending for the Current Year - (\$)								
		\$5,442,000		\$6,126,000		\$3,643,161		\$6,426,697
21. Projected Annual Production Number (#) - Current Year								
Heating Jobs								
		610		470		210		340
Water Heating Jobs								
		520		1,205		282		520
Baseload Jobs								
		410		645		373		210
22. Average Job Costs (\$)								
Heating Jobs								
		\$4,206		\$3,528		\$4,137		\$4,779
Water Heating Jobs								
		\$2,713		\$2,153		\$1,925		\$3,029
Baseload Jobs								
		\$2,199		\$1,563		\$1,442		\$2,337
<b>CAP</b>								
23. Program Costs - Administration (\$)								
		\$1,421,762		\$1,902,787		\$476,846		\$1,695,378
24. Program Costs - CAP Credits (\$)								
		\$12,099,093		\$15,450,895		\$3,606,122		\$13,898,315

54.75 and 62.5 Requirements	Met-Ed	Met-Ed	Penelec	Penelec	Penn Power	Penn Power	West Penn Power	West Penn Power
	All Residential	Confirmed Low Income						
25. Program Costs - Preprogram Arrearage Forgiveness (\$)		\$1,414,537		\$1,459,446		\$338,527		\$2,145,692
Program Costs - CAP Accounts in Arrears - (\$):								
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)								
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)								
Program Costs - CAP Accounts in Arrears - (#):								
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)								
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)								
28. Number of Family Members Under Age 18		1.07		0.71		0.68		0.74
29. Number of Family Members Over Age 62		0.26		0.33		0.35		0.30
30. Family Size		2.59		2.17		2.11		2.22
31. Income (\$)		\$ 15,249		\$ 14,419		\$ 14,301		\$ 14,390
32. Source of Income								
Employment		5,181		5,293		1,085		4,867
Public Assistance		214		476		107		324
Pension/Retirement		3,336		5,428		1,268		4,515
Unemployment Compensation		517		540		111		557
Disability		6,051		9,996		2,094		8,749
Other (includes Missing Data)		5,874		6,279		1,327		6,371
33. Participation Levels By Month - Income at or below 50% of Poverty (#): (3)								
January		3,356		3,633		767		3,766
February		3,326		3,622		774		3,692
March		3,351		3,598		764		3,736
April		3,362		3,560		765		3,755
May		3,303		3,437		754		3,641
June		3,202		3,340		726		3,525
July		3,191		3,349		742		3,532
August		3,140		3,308		701		3,387
September		3,089		3,304		703		3,275
October		3,040		3,256		687		3,242
November		2,947		3,184		681		3,163
December		2,920		3,209		703		3,147
34. Participation Levels by Month - Income between 51% and 100% of Poverty (#): (3)								
January		6,607		9,934		2,146		8,702
February		6,569		9,889		2,141		8,486
March		6,575		9,876		2,137		8,543
April		6,494		9,778		2,101		8,462
May		6,363		9,622		2,032		8,248
June		6,171		9,402		1,972		8,014
July		6,155		9,360		1,973		7,968
August		6,089		9,291		1,946		7,800
September		5,992		9,090		1,886		7,482
October		5,965		9,017		1,846		7,255
November		5,854		8,860		1,856		7,254
December		5,852		8,924		1,860		7,354
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#): (3)								
January		4,774		7,041		1,628		6,300
February		4,771		7,008		1,596		6,194
March		4,796		6,969		1,588		6,257
April		4,840		6,888		1,573		6,221
May		4,734		6,713		1,523		6,075
June		4,627		6,576		1,499		5,895
July		4,593		6,591		1,497		5,844
August		4,536		6,554		1,449		5,626
September		4,442		6,416		1,407		5,376
October		4,342		6,298		1,367		5,207
November		4,277		6,174		1,399		5,167
December		4,271		6,154		1,413		5,191
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)		2,306		2,496		583		2,879
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)		2,869		3,739		888		4,135
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)		2,370		3,010		718		3,301
39. Participation Level: Exists other than Defaults (#)		210		224		40		275
40. Energy Assistance Benefits (\$)		\$ 1,168,832		\$ 1,473,864		\$ 392,083		\$ 1,906,514
41. Energy Assistance Benefits (#)		3,426		4,244		1,136		5,502
42. Number of Full CAP Payments by Month:								
January		8,851		15,101		3,267		12,215
February		8,993		14,235		2,960		11,402
March		9,919		15,333		3,327		12,297
April		8,927		13,955		3,051		11,798
May		10,524		15,437		3,200		12,378
June		9,873		14,582		2,909		11,369
July		10,047		14,537		3,057		11,896
August		9,257		13,767		2,617		10,907
September		9,234		13,675		2,487		10,196
October		9,673		14,301		2,927		10,879
November		7,363		11,665		2,250		9,570
December		9,180		13,734		2,609		10,311
CAP Benefits:								
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)		\$9,544,869		\$11,842,204		\$2,939,090		\$12,429,302
44. Total Number of CAP Bills Rendered by Month (#):								
January		14,749		20,640		4,541		18,618
February		13,803		19,598		3,984		17,583
March		14,347		20,238		4,424		18,199
April		14,270		20,133		4,348		18,087
May		14,253		19,750		4,259		17,913
June		13,783		19,172		4,152		17,077
July		13,946		19,339		4,185		17,300
August		13,008		18,303		3,638		16,098
September		13,405		18,672		3,912		15,930
October		13,340		18,617		3,898		15,646
November		11,267		16,551		3,252		14,400
December		13,034		18,222		3,910		15,624
45. Total Cash Payments by CAP Customers (\$)		\$9,278,823		\$11,355,408		\$2,812,354		\$11,569,879
46. Number of Full, On-Time Payments (#):		89,799		140,873		28,126		108,864
payment rate								
CARES								

54.75 and 62.5 Requirements	Met-Ed All Residential	Met-Ed Confirmed Low Income	Penelec All Residential	Penelec Confirmed Low Income	Penn Power All Residential	Penn Power Confirmed Low Income	West Penn Power All Residential	West Penn Power Confirmed Low Income
47. Program Costs (\$) (5)		\$7,764		\$11,222		\$2,696		\$11,520
48. Number of Family Members Under Age 18								
49. Number of Family Members Over Age 62								
50. Family Size								
51. Income (\$)								
52. Source of Income:								
Employment								
Public Assistance								
Pension/Retirement								
Unemployment Compensation								
Disability								
Other (includes Missing Data)								
53. Participation Levels By Month:								
January		0		1		0		1
February		0		2		0		1
March		0		1		2		1
April		2		0		1		3
May		0		0		2		5
June		2		2		1		1
July		1		1		1		0
August		1		2		0		0
September		1		3		2		1
October		2		3		1		3
November		2		0		0		0
December		0		0		0		1
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)		\$614		\$624		\$0		\$891
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		3		3		0		5
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)		\$1,773		\$333		\$0		\$610
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		4		1		0		2
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (Total)		\$ 2,138,128		\$ 3,119,702		\$ 741,299		\$ 3,447,601
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (Total)		8,023		10,620		2,554		12,021
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (Total)		\$ 1,195,002		\$ 1,983,069		\$ 562,324		\$ 2,014,655
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (Total)		2,728		4,545		1,247		4,557
62. Direct Dollars Applied to CARES Accounts (\$)		\$2,887		\$957		\$500		\$2,422
63. Direct Dollars Applied to CARES Accounts (#)		8		4		1		11
64. CARES Benefits (#) - Number of Customers Referred to CARES		11		15		10		17
65. CARES Benefits (#) - Number of Customers Accepted into CARES		11		15		10		17
<b>Hardship Fund</b>								
66. Program Costs (Administrative Costs Only):								
Administrative Costs from Rate Base (\$)		\$33,719		\$22,704		\$12,359		\$34,555
Administrative Costs from Shareholders (\$)								
67. Number of Family Members Under Age 18		1.34		1.16		1.14		1.13
68. Number of Family Members Over Age 62		0.19		0.18		0.25		0.25
69. Family Size		2.97		2.75		2.84		2.82
70. Income (\$)		\$24,387		\$23,291		\$25,587		\$24,829
71. Source of Income:								
Employment		335		214		98		306
Public Assistance		5		7		0		4
Pension/Retirement		86		44		33		119
Unemployment Compensation		8		13		4		11
Disability		114		95		40		131
Other (includes Missing Data)		107		56		23		82
72. Participation Levels By Month (#):								
October		168		189		45		294
November		57		46		11		94
December		7		7		2		9
January		9		11		1		13
February		6		2		4		17
March		67		94		43		137
April		202		80		74		73
May		114		0		6		16
June		25		0		2		0
July		0		0		8		0
August		0		0		2		0
September		0		0		0		0
73. Ratepayer/Employee Contributions (\$)		\$114,404		\$72,859		\$36,639		\$144,381
74. Special Contributions (\$):								
Citizens Energy Corporation		\$ -		\$ -		\$ -		\$ -
Companies Other Than Utilities		\$ -		\$ -		\$ -		\$ -
Settlements and Fines		\$ -		\$ -		\$ -		\$ -
Other		\$ -		\$ -		\$ -		\$ -
match)								
76. Utility Contributions (\$) - (excluding #66 and #75)		\$114,404		\$72,859		\$36,639		\$108,224
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$114,404		\$72,859		\$36,639		\$108,224
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) (6) (This is a separate list)								
Hardship Fund Benefits:								
79. Cash Benefits (#)		655		429		198		653
80. Cash Benefits (\$)		\$233,950		\$146,000		\$72,000		\$217,548
(5) CARES data indicated with response of "-1" is result of approval of the Company's 3-year Universal Service Plan-included with CAP								

**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
2024 BASE RATE CASE FILING  
DOCKET NO. R-2024-3047068**

**OFFICE OF CONSUMER ADVOCATE Set I, No. 6**

“In Excel format, for each month for the most recent 36 months available, please provide the mean usage for:

- a. Residential customers as a whole;
- b. Confirmed low-income customers (without CAP participants);
- c. Confirmed low-income customers (with CAP participants);
- d. CAP participants.

Provide for FirstEnergy as a whole and for each operating Company.”

**RESPONSE:**

- a. See FE PA Response to OCA Interrogatory Set I, No. 006, Attachment A
- b. See FE PA Response to OCA Interrogatory Set I, No. 006, Attachment B. Data provided in response to “Confirmed low-income customers (without CAP participants)” is based upon the customer’s low income and CAP status as of April 2024.
- c. See FE PA Response to OCA Interrogatory Set I, No. 006, Attachment B. Data provided in response to “Confirmed low-income customers (with CAP participants)” is based upon the customer’s low-income status as of April 2024.
- d. See FE PA Response to OCA Interrogatory Set I, No. 006, Attachment B. Data provided in response to “CAP participants” is based upon the customer’s CAP status as of April 2024.

Rate Dist Code	Year/ Month	Regional IEVA customers, excluding confirmed low-income customers and PCAP		Confirmed low-income customers	Confirmed low-income customers	Confirmed low-income customers	Confirmed low-income customers
		Year/ Month	Confirmed low-income customers and PCAP	Confirmed low-income customers	Confirmed low-income customers	Confirmed low-income customers	Confirmed low-income customers
ME01	201800	783	712	736	712	712	712
ME01	201811	774	774	776	760	760	760
ME01	201802	1137	1086	1090	1131	1131	1131
ME01	201803	1131	1131	1131	1131	1131	1131
ME01	201804	1131	1131	1131	1131	1131	1131
ME01	201805	1143	1137	1140	1135	1135	1135
ME01	201806	1041	1003	1005	1005	1005	1005
ME01	201807	906	856	854	869	869	869
ME01	201808	876	813	813	811	811	811
ME01	201809	1094	992	1015	982	982	982
ME01	201810	1292	1252	1274	1244	1244	1244
ME01	201809	1102	1054	1038	1021	1021	1021
ME01	201802	782	752	752	752	752	752
ME01	201801	790	750	748	742	742	742
ME01	201812	1041	992	1000	988	988	988
ME01	201810	1419	1353	1337	1343	1343	1343
ME01	201811	1277	1209	1205	1219	1219	1219
ME01	201803	1222	1270	1230	1211	1211	1211
ME01	201804	920	920	920	920	920	920
ME01	201805	801	751	754	774	774	774
ME01	201806	871	806	818	812	812	812
ME01	201807	1101	1009	1038	1010	1010	1010
ME01	201808	1441	1347	1370	1347	1347	1347
ME01	201809	1112	1046	1030	1041	1041	1041
ME01	201810	811	757	772	758	758	758
ME01	201811	810	770	761	769	769	769
ME01	201812	1037	1070	1054	1111	1111	1111
ME01	201801	1246	1200	1243	1229	1229	1229
ME01	201802	1246	1246	1246	1246	1246	1246
ME01	201803	1246	1246	1246	1246	1246	1246
ME01	201804	1017	988	1017	1025	1025	1025
ME01	201805	844	814	814	814	814	814
ME01	201806	874	811	823	822	822	822
ME01	201807	1077	964	1008	1008	1008	1008
ME01	201808	1198	1105	1128	1112	1112	1112
ME01	201809	1209	1209	1209	1202	1202	1202
ME01	201810	774	722	724	727	727	727
ME01	201811	809	771	762	761	761	761
ME01	201812	1122	1061	1090	1141	1141	1141
ME01	201801	1418	1382	1428	1428	1428	1428
ME01	201802	1254	1232	1238	1234	1234	1234
ME01	201803	1174	1120	1130	1124	1124	1124
ME01	201804	1017	942	930	982	982	982
ME01	201805	787	722	724	749	749	749
ME01	201806	730	704	713	681	681	681
ME01	201807	1027	938	948	948	948	948
ME01	201808	1107	1030	1041	1034	1034	1034
ME01	201809	1245	976	1000	874	874	874
ME01	201810	765	724	727	737	737	737
ME01	201811	744	744	721	821	821	821
ME01	201812	1117	1103	1107	1169	1169	1169
ME01	201801	1237	1248	1248	1254	1254	1254
ME01	201802	1130	1203	1245	1358	1358	1358
ME01	201803	1127	1022	1022	1000	1000	1000
ME01	201804	1038	1021	1021	1021	1021	1021
ME01	201805	720	682	686	686	686	686
ME01	201806	864	804	814	901	901	901
ME01	201807	940	864	864	944	944	944
ME01	201808	811	811	811	801	801	801
ME01	201809	784	742	746	742	742	742
ME01	201810	758	720	723	711	711	711
ME01	201811	708	640	640	640	640	640
ME01	201812	821	739	744	738	738	738
ME01	201801	930	840	840	840	840	840
ME01	201802	823	740	740	741	741	741
ME01	201803	1138	1040	1040	1040	1040	1040
ME01	201804	682	641	640	649	649	649
ME01	201805	842	810	810	822	822	822
ME01	201806	1087	1028	1026	1031	1031	1031
ME01	201807	1014	964	964	964	964	964
ME01	201808	946	891	941	959	959	959
ME01	201809	1174	710	740	740	740	740
ME01	201810	688	646	652	651	651	651
ME01	201811	702	650	652	651	651	651
ME01	201812	812	783	783	783	783	783
ME01	201801	840	783	783	802	802	802
ME01	201802	871	802	802	794	794	794
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	744	744	744	744	744	744
ME01	201806	758	720	723	711	711	711
ME01	201807	708	640	640	640	640	640
ME01	201808	821	739	744	738	738	738
ME01	201809	930	840	840	840	840	840
ME01	201810	823	740	740	741	741	741
ME01	201811	1138	1040	1040	1040	1040	1040
ME01	201812	682	641	640	649	649	649
ME01	201801	842	810	810	822	822	822
ME01	201802	1087	1028	1026	1031	1031	1031
ME01	201803	1014	964	964	964	964	964
ME01	201804	946	891	941	959	959	959
ME01	201805	1174	710	740	740	740	740
ME01	201806	688	646	652	651	651	651
ME01	201807	702	650	652	651	651	651
ME01	201808	812	783	783	783	783	783
ME01	201809	840	783	783	802	802	802
ME01	201810	871	802	802	794	794	794
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811
ME01	201807	811	811	811	811	811	811
ME01	201808	811	811	811	811	811	811
ME01	201809	811	811	811	811	811	811
ME01	201810	811	811	811	811	811	811
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811
ME01	201807	811	811	811	811	811	811
ME01	201808	811	811	811	811	811	811
ME01	201809	811	811	811	811	811	811
ME01	201810	811	811	811	811	811	811
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811
ME01	201807	811	811	811	811	811	811
ME01	201808	811	811	811	811	811	811
ME01	201809	811	811	811	811	811	811
ME01	201810	811	811	811	811	811	811
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811
ME01	201807	811	811	811	811	811	811
ME01	201808	811	811	811	811	811	811
ME01	201809	811	811	811	811	811	811
ME01	201810	811	811	811	811	811	811
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811
ME01	201807	811	811	811	811	811	811
ME01	201808	811	811	811	811	811	811
ME01	201809	811	811	811	811	811	811
ME01	201810	811	811	811	811	811	811
ME01	201811	811	811	811	811	811	811
ME01	201812	811	811	811	811	811	811
ME01	201801	811	811	811	811	811	811
ME01	201802	811	811	811	811	811	811
ME01	201803	811	811	811	811	811	811
ME01	201804	811	811	811	811	811	811
ME01	201805	811	811	811	811	811	811
ME01	201806	811	811	811	811	811	811



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**PREPARED SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.**

1       **I.       INTRODUCTION**

2       **Q:       Please state your name, occupation, and business address.**

3       A:       My name is Harry Geller. I am a retired attorney with emeritus status . I am the former  
4       Director of the Pennsylvania Utility Law Project. I continue to serve as a consultant to legal aid  
5       programs and their clients. I maintain an office at 118 Locust St., Harrisburg, PA 17101.

6       **Q:       Did you previously submit testimony in this proceeding?**

7       A:       Yes. I submitted direct testimony that is pre-marked as CAUSE-PA Statement 1.

8       **Q:       What is the purpose of your surrebuttal testimony?**

9       A:       My surrebuttal testimony responds to the rebuttal testimonies provided by expert witness  
10       for FirstEnergy Pennsylvania Electric Company (hereafter, FE PA, FirstEnergy, or the Company),  
11       Mark A. Jones, and the Bureau of Investigation and Enforcement (I&E) expert witness, Vanessa  
12       Okum.

13       This surrebuttal testimony is not intended to address every issue raised or otherwise  
14       discussed by other parties' witnesses in rebuttal testimony. Absence of a response to any specific  
15       recommendation or position of any witness does not indicate my agreement. Unless required for  
16       context in providing a further response to rebuttal testimony, I will not reiterate the extensive  
17       arguments and evidence that I provided in my direct testimony. To the extent an argument raised  
18       by any party in rebuttal testimony is already sufficiently addressed in my direct testimony, I do not  
19       intend to respond, and stand on the evaluation, analysis, and recommendations contained in my  
20       direct testimony. I further note that several witnesses advanced extensive legal arguments in their  
21       rebuttal testimony. Unless a factual basis is necessary to inform those legal arguments, I do not

1 intend to respond – though I am informed by Counsel for CAUSE-PA that those arguments will be  
2 fully addressed through briefing.

3 **Q: How is your surrebuttal testimony organized?**

4 A: My surrebuttal testimony is divided into four sections. In Section I, I introduce my  
5 surrebuttal testimony. In Section II, I respond to rebuttal testimony of FE PA’s expert witness,  
6 Mark A. Jones related to recommended improvements to FE PA’s universal service programs, and  
7 the policies and procedures affecting FE PA’s low income customers. In Section III, I respond to  
8 the rebuttal testimony of I&E expert witness Vanessa Okum contained in I&E St. 1-R related to  
9 my recommended improvements to FE PA’s Hardship Fund and Low Income Usage Reduction  
10 Program (LIURP). In Section IV, I conclude my surrebuttal testimony.

11 **II. RESPONSE TO MARK A. JONES**

12 **A. Universal Service Improvements – Generally**

13 **Q: Please summarize Mr. Jones’s overarching assertions regarding universal service**  
14 **program issues addressed in your direct testimony.**

15 A: As a general response to recommendations to improve FE PA’s low income programming  
16 to address increased rate unaffordability created by its proposed rate increase, Mr. Jones argues  
17 that it is inappropriate to propose recommendations which would require modifications to the  
18 Company’s USECP in the context of this proceeding.<sup>1</sup> Mr. Jones argues that the PUC has  
19 previously declined to address universal service issues in the context of a base rate proceeding, on  
20 the grounds that these proposals should be addressed instead in USECP proceedings.<sup>2</sup>

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<sup>1</sup> FE PA St. 8-R at 3: 3-22.

<sup>2</sup> Id., citing See, e.g., Pa. PUC v. PECO Energy Co., Docket Nos. R-2020-3018929, et al., pp. 195-96 (Order entered June 22, 2021); Pa. PUC v. Columbia Gas of Pa., Inc., Docket Nos. R-2020-3018835, et al., pp. 160-61 (Order

1 **Q: Is it appropriate to address rate affordability issues, and the adequacy of universal**  
2 **service programs to address those issues, in this rate proceeding?**

3 A: Yes, absolutely. As a threshold matter, Counsel for CAUSE-PA has advised me that Mr.  
4 Jones’s legal analysis of prior Commission orders is flawed, and will be addressed more thoroughly  
5 through briefing. Putting those legal issues aside, as a matter of sound public policy, I believe it is  
6 essential that issues related to FE PA’s universal service and energy conservation programs are  
7 addressed within the context of this base rate proceeding. In asserting that it is inappropriate to  
8 examine the merits of universal service issues in the context of this proceeding, Mr. Jones fails to  
9 recognize that universal service programs set rates and terms and conditions for service for low  
10 income customers and other residential ratepayers, and must therefore be subject to a full and  
11 meaningful review in the context of this proceeding to ensure that rates for low income customers  
12 are just, reasonable, and squarely in the public interest.

13 FE PA is proposing in this case to substantially increase rates for basic home electric  
14 services. Those proposed rates will have a direct and substantial impact on the ability of low  
15 income consumers to access and afford energy services to their home. An evaluation of the justness  
16 and reasonableness of existing and proposed rates must necessarily analyze the adequacy and  
17 design of rate assistance programming to ensure that basic energy services are reasonably  
18 affordable and universally accessible to FE PA’s customers. Affordability of rates for low income  
19 customers, and in turn the structure and delivery of universal service programming, are key  
20 components of determining whether rates are just and reasonable. In short, to be just and  
21 reasonable, it is critical that rates are also affordable for all those served. Indeed, it is not just and  
22 reasonable to set rates that will price a subset of the population out of the market for energy

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entered Feb. 19, 2021); Pa. PUC v. PPL Elec. Utils. Corp., Docket Nos. R-2012-2290597, et al., pp. 48-51 (Order entered Dec. 28, 2012).

1 services. To meaningfully conduct an investigation of proposed and existing FE PA's rates, it is  
2 necessary to examine the lawfulness, justness, and reasonableness of the design and delivery of  
3 FE PA's universal service and energy conservation programs. These programs determine whether  
4 and to what extent low income customers can receive assistance and, in turn, just and reasonable  
5 rates.

6 Rate proceedings such as the present proceeding also provide an important forum to review  
7 all rate-supported utility programming and any issues related thereto which affect the rates, terms,  
8 and conditions for services. This includes issues related to the affordability and accessibility of  
9 universal service programs, which are core to the determination of whether residential rates – as  
10 applied – are just, reasonable, and in furtherance of the public interest. Unlike USECP proceedings,  
11 rate proceedings provide opportunities for parties to conduct a heightened investigation before an  
12 Administrative Law Judge (ALJ) related to important changes affecting rates for low income  
13 customers. Addressing universal service issues in the context of rate proceedings also provides  
14 parties an important forum to address interconnected funding considerations which may affect base  
15 rate considerations.

16 Furthermore, precluding consideration of universal service issues in the context of a rate  
17 proceeding ignores the statutory mandate to ensure that all rates charged are just and reasonable  
18 and denies meaningful opportunity of the parties to review the same. The Public Utility Code  
19 requires the Commission to ensure that *all* rates and charges and every rule, regulation, and  
20 procedure affecting those charges (whether current or proposed) are just, reasonable, and in  
21 accordance with regulation and Commission orders.<sup>3</sup> Ignoring referral and enrollment issues, in

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<sup>3</sup> 66 Pa. C.S. §§ 1301, 1309.

1 turn, sidesteps FE PA’s statutory obligation to ensure that applicants and customers always receive  
2 the most advantageous rate available.<sup>4</sup>

3 I note that in its recent decision in the PGW rate proceeding, the Commission found that  
4 tabling consideration of universal service issues in the context of PGW’s next USECP proceeding  
5 would result in denying low income customers relief for an extended period of time.<sup>5</sup> The  
6 Commission found that such results would unreasonably “thwart the purpose of universal service,  
7 which is to help low-income customers maintain their natural gas services. See, 66 Pa. C.S. §  
8 2202.” The Commission also found persuasive arguments that base rate proceedings provide a  
9 more formal review process for USECP review processes.<sup>6</sup>

10 Mr. Jones’s arguments also imply that changes to USECPs can only be effectuated in the  
11 context of USECP proceedings. This is incorrect, and contrary to FE PA’s own proposals in this  
12 case. FE PA’s Energy Assistance Outreach Team (EAOT) proposal would require amendment and  
13 modification of FE PA’s USECP. Utilities and intervenors, alike, have long raised universal service  
14 program issues in the context of a base rate proceeding. The existence of an often delayed  
15 quinquennial USECP policy review, based upon the submission of comments, is not a reasonable  
16 substitute to the formal, timely inquiry and investigation based upon sworn testimony, subject to  
17 discovery and cross examination, which is required to be decided in the context of reviewing a  
18 utilities’ rates, terms, conditions of service and timely executed in tandem with an approved  
19 adjustment to rates.

20 It would be incongruous to exclude consideration of universal service program issues in  
21 the context of determining the justness and reasonableness of rates resulting out of this proceeding.

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<sup>4</sup> 66 Pa. C.S. § 1303.

<sup>5</sup> Pa. PUC v. PGW, Order, Docket No. R-2023-3037933 at 215-216 (Order dated Nov. 9, 2023).

<sup>6</sup> Id.

1 Deferring determination of such issues to a review process devoid of the same exacting standards  
2 of due process, years after rates take effect, places the justness of rates provided to FE PA's low  
3 income customers in this proceeding in significant question. Counsel for CAUSE-PA has advised  
4 me that it reserves these issues, which require legal analyses, for briefing.

5 **Q: Please summarize Mr. Jones's arguments related to the impact of FE PA's recently**  
6 **approved USECP on your analyses and recommendations in the present proceeding, to which**  
7 **you wish to respond.**

8 A: Mr. Jones argues against my conclusions and the conclusions of Roger Colton, expert  
9 witness for the Office of Consumer Advocate (OCA), that the proposed rate increase will  
10 negatively impact energy affordability and the ability of low income customers to pay their bills.<sup>7</sup>  
11 While generally pointing to FE PA's Energy Assistance Outreach Team (EAOT) proposal<sup>8</sup> as  
12 allegedly having the ability to target specific low income groups, Mr. Jones argues FE PA has  
13 proposed changes in its USECP proceeding designed to improve bill affordability for low income  
14 customers.<sup>9</sup>

15 **Q: What is your response to Mr. Jones's arguments related to the impact of FE PA's**  
16 **pending USECP on your analyses and recommendations in this proceeding?**

17 A: Counsel for CAUSE-PA has advised me that it will address through briefing certain legal  
18 issues related to the impact of FE PA's pending USECP on the present matter. That said, I am aware  
19 that the Commission has recently approved certain improvements to FE PA's universal service  
20 programs in the context of FE PA's pending USECP proceeding, including approval that FE PA

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<sup>7</sup> FE PA St. 8-R at 27: 6-17.

<sup>8</sup> CAUSE-PA St. 1 at 52-53.

<sup>9</sup> FE PA St. 8-R at 27: 6-17.

1 transition to a revised PCAP Percentage of Income Payment (PIP) structure.<sup>10</sup> While certain  
2 revisions made in the context of FE PA's USECP will provide needed improvements to the  
3 structure, design, and delivery of FE PA's universal service programs *at current rates*, these  
4 revisions were adopted based on FE PA's existing rates, and do not take into consideration  
5 increases in unaffordability which would result if FE PA were permitted to increase its basic rates  
6 of service as proposed in this proceeding. As discussed, rate proceedings such as the present one  
7 provide an important forum where parties and the Commission can engage in a formal review of  
8 issues related to affordability and accessibility of universal service programs and provide an  
9 important avenue to address interconnected funding considerations which affect base rate  
10 considerations.

11 While arguing that my recommended improvements related to FE PA's universal services  
12 programs should not be considered because it would require amendment to FE PA's USECP, Mr.  
13 Jones argues simultaneously that FE PA's proposal to implement an EAOT related to universal  
14 service outreach should be approved. As I extensively discuss below and in my direct testimony,  
15 FE PA's EAOT proposal is insufficient, flawed, and contains inadequate provisions to ensure that  
16 the initiative will have any meaningful impact on low income customers' ability to learn about and  
17 ultimately enroll in assistance. It is imperative that all parties be permitted to address, and FE PA  
18 be required to meaningfully eliminate, unaffordability of rates both at present and as proposed.

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<sup>10</sup> FE PA 2024-2028 USECP, Order, Docket No. M-2022-3036532; M-2022-3036533; M-2022-3036534; M-2022-3036535, at 21-23 (Order entered May 14, 2024).

1                    **B. PCAP**

2    **Q: Please briefly summarize Mr. Jones’s rebuttal testimony related to your**  
3    **recommended improvements to the design and delivery of FE PA’s PCAP to which you wish**  
4    **to respond.**

5    A: As explained at length in my direct testimony, thousands of PCAP participants under both  
6    FE PA’s current and pending USECP will be impacted by any approved rate increase in this  
7    matter.<sup>11</sup> To help address the financial impact of any approved rate increase on low income  
8    customers, I recommended through direct testimony that FE PA be required to implement all  
9    approved changes to its PCAP prior to implementing any approved increase in residential rates.<sup>12</sup>  
10   I further recommended that, as of the effective date of rates, FE PA review and adjust PCAP rates  
11   to reflect any approved increase of residential rates to eliminate any lag in the recalculation of rate  
12   assistance levels and ensure PCAP customers are receiving the most advantageous PCAP rate  
13   available.<sup>13</sup> To address the unaffordability of present and proposed rates for FE PA’s low income  
14   customers enrolled in CAP, I also recommended that FE PA be required to adjust its maximum  
15   PCAP credit limits.<sup>14</sup>

16            In response, Mr. Jones explains that, on July 11, 2024, the Commission granted in part and  
17   denied in part CAUSE-PA’s Petition for Reconsideration of FE PA’s 2024-2028 USECP proceeding.  
18   Mr. Jones indicates that FE PA is proceeding with several PCAP changes in September 2024, with  
19   the remainder of technical changes to be implemented in December 2024 – prior to the proposed

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<sup>11</sup> CAUSE-PA St. 1 at 34.

<sup>12</sup> Id. at 35.

<sup>13</sup> Id. at 34.

<sup>14</sup> Id. at 35.

1 rate increase effective date.<sup>15</sup> Mr. Jones also indicates that an amended 2024-2028 USECP will be  
2 filed with the Commission per the July 11, 2024 Order.<sup>16</sup>

3 Mr. Jones disagrees with my recommendation that FE PA be required to adjust its PCAP  
4 maximum credit limits.<sup>17</sup> He argues that PCAP subsidy limits were addressed in the July 11, 2024  
5 Commission Order, and that my recommendations related to PCAP subsidy limits in this  
6 proceeding would require Commission-approved amendments to its USECP.<sup>18</sup> Mr. Jones also  
7 argues that retroactively changing PCAP credit limits would be complex and may require  
8 significant IT efforts for a one-time transaction.<sup>19</sup> He points instead to implementation of the 2024-  
9 2028 USECP, whereby PCAP participants will have balances set aside for forgiveness credits as  
10 part of the conversion process.<sup>20</sup>

11 **Q: What is your response to Mr. Jones’s rebuttal testimony related to your recommended**  
12 **improvements to the design and delivery of PCAP, as you have outlined?**

13 A: FE PA has indicated that they intend to implement changes to PCAP provided for in its  
14 2024-2028 USECP between September and December 2024, which would effectively occur prior  
15 to the implementation of any rate increase. However, there is currently no requirement and FE PA  
16 has not committed to review and adjust PCAP rates based on any increase in residential rates  
17 approved as a result of this proceeding. It is imperative that FE PA be required to account for any  
18 increase to CAP rates resulting from the present proceeding which may affect PCAP customers’  
19 monthly bills.

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<sup>15</sup> FE PA St. 8 at 24, 26.

<sup>16</sup> Id. at 26.

<sup>17</sup> Id. at 26: 15-20.

<sup>18</sup> Id. at 26-27.

<sup>19</sup> Id. at 27: 1-5.

<sup>20</sup> Id.

1                   **C. Hardship Fund**

2       **Q:     In his rebuttal testimony, Mr. Jones opposes your recommended improvements to FE**  
3       **PA’s Hardship Fund. How do you wish to respond?**

4       A:     In my direct testimony, I explained that FE PA’s Hardship Fund grant is not adequately  
5       serving the well-documented need for assistance amongst low income customers. I also raised  
6       substantial concerns that FE PA’s Hardship Fund contained inappropriate and restrictive barriers  
7       to customers accessing grant assistance, including PCAP customers only being able to access grant  
8       assistance if their service is off during certain times of the program year.<sup>21</sup> To address the unmet  
9       need for Hardship Fund assistance, I recommended that FE PA (1) increase its maximum annual  
10      funding for the Hardship Fund to \$1 million; (2) develop a plan to solicit voluntary Hardship Fund  
11      contributions; (3) adopt explicit exemptions to its upfront payment requirements; (4) amend  
12      seasonable parameters for its Hardship Fund so that, at minimum, customers whose electric service  
13      is off or who are at risk of termination can qualify for Hardship Fund grant assistance; (5) eliminate  
14      the prohibition against PCAP customers receiving a Hardship Fund grant; and (6) increase its  
15      maximum grant amount from \$500 to \$600.<sup>22</sup>

16            In response to these recommendations, Mr. Jones repeats his argument that issues with FE  
17      PA’s Hardship Fund are not appropriately reviewed as part of the present proceeding.<sup>23</sup> Mr. Jones  
18      argues that revisions to the Hardship Fund upfront payment requirements were made in the context  
19      of FE PA’s 2024-2028 USECP, so that upfront payments do not exceed three PCAP amounts or  
20      \$150 (\$100 if over the age of 62), whichever is less.<sup>24</sup> Notably, while Mr. Jones argues hardship  
21      funding considerations should be relegated to USECP proceedings, Mr. Jones points to hardship

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<sup>21</sup> CAUSE-PA St. 1 at 41-42.

<sup>22</sup> Id. at 42-44.

<sup>23</sup> FE PA St. 8-R at 18: 1-13.

<sup>24</sup> Id.

1 funding improvements ordered in the context of FE PA’s recent consolidation proceeding as a  
2 reason why further improvements are not needed in this case to help offset exacerbated hardships  
3 caused by FE PA’s proposed rate increase.<sup>25</sup>

4 As discussed, an evaluation of the justness and reasonableness of existing and proposed  
5 rates must necessarily analyze the adequacy and design of rate assistance programs, including FE  
6 PA’s Hardship Fund, to ensure that low income customers are able to afford and stay connected to  
7 services. In tandem with FE PA’s other universal service programs, FE PA’s Hardship Fund is  
8 designed to provide rate assistance to households experiencing an acute financial hardship. The  
9 adequacy of design, delivery, and funding of FE PA’s Hardship Fund determines whether and to  
10 what extent low income customers can receive grant assistance necessary to addressing  
11 unaffordable arrearage and staying connected to services. I therefore strongly disagree with Mr.  
12 Jones’s arguments that critical issues with the adequacy and accessibility of hardship fund  
13 assistance should be shunted aside to a future proceeding. FE PA is proposing to dramatically  
14 increase rates within the context of this proceeding, which will increase the need for hardship fund  
15 assistance. I stand firmly by my recommendations to improve the design, delivery, and funding of  
16 FE PA’s Hardship Fund.

17 **Q: Please summarize Mr. Jones's rebuttal testimony related to your recommendations to**  
18 **increase the Hardship Fund’s maximum grant amount from \$500 to \$600, to which you wish**  
19 **to respond.**

20 A: In my direct testimony, I raised concerns that FE PA’s Hardship Fund is not adequately  
21 serving the well-documented need for assistance. For example, in 2022 and 2023, despite 23,308  
22 confirmed low income customers being terminated for nonpayment, only 4,334 Hardship Fund

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<sup>25</sup> FE PA St. 8-R at 19: 1-10.

1 grants were issued.<sup>26</sup> I also noted that the average Hardship Fund grant was out of line with the  
2 average arrearage level carried by low income customers. For example, as of March 2024, the  
3 average Hardship Fund grant across FE PA's Rate Districts varied between \$307-\$332, while the  
4 average confirmed low income average arrearage varied by Rate District from \$900-\$991.<sup>27</sup>

5 Mr. Jones argues against my reliance on average arrearage levels to show the unmet need  
6 for Hardship Funding amongst FE PA's low income customers.<sup>28</sup> Mr. Jones explains that the  
7 majority of Hardship Fund grants are based on the amount needed to stop termination and may not  
8 include the full arrearage amount. Thus, Mr. Jones argues against my recommendation to increase  
9 the maximum Hardship Fund grant amount from \$500 to \$600.<sup>29</sup>

10 **Q: What is your response to Mr. Jones arguments against increasing the maximum**  
11 **Hardship Fund grant amount from \$500 to \$600, as you have outlined?**

12 A: I disagree with Mr. Jones that it is inappropriate to examine average arrearage levels of FE  
13 PA's low income customers as an indicator of the need for Hardship Fund assistance. As discussed,  
14 substantial numbers of FE PA's confirmed low income customers are terminated for nonpayment  
15 without access to grant assistance, often because the debt owed to prevent termination or to restore  
16 service exceeds the maximum grant amount. Indeed, given average arrearage levels range from  
17 \$900-990 across divisions, it is necessarily true that many low income households carry  
18 substantially higher than average debts. And, as rates increase, the amounts needed to prevent  
19 termination are likely to grow even more pronounced. Moreover, Mr. Jones argument that FE PA's  
20 Hardship Fund is not designed to address full arrearage amounts further limits to ability of the  
21 Hardship Fund to address the unaffordability and unmanageable accrual of arrears amongst FE

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<sup>26</sup> CAUSE-PA St. 1 at 37: 11-16.

<sup>27</sup> Id. at 38: Table 10.

<sup>28</sup> FE PA St. 8-R at 19: 11-18.

<sup>29</sup> Id.

1 PA's low income customers. Indeed, a customer who receives a Hardship Fund grant of only a  
2 certain portion of their arrearage balance to avoid immediate termination may continue to  
3 experience payment difficulties because of remaining arrearage balances. Thus, it is imperative  
4 that maximum Hardship Fund amounts are designed to better address need amongst low income  
5 customers for assistance to avoid termination and address the accrual of unmanageable arrears.  
6 For these reasons, I stand by my recommendations set forth in my direct testimony that FE PA  
7 make meaningful improvements to its Hardship Fund, including increasing the maximum grant  
8 amount from \$500 to \$600.

9 **Q: Please summarize Mr. Jones's rebuttal testimony related to your recommended**  
10 **improvements to the voluntary contributions of FE PA's Hardship Fund to which you wish**  
11 **to respond.**

12 A: In my direct testimony, I explained that FE PA's Hardship Fund grant is not adequately  
13 serving the well-documented need for assistance amongst low income customers. I also raised  
14 concerns that voluntary contributions to FE PA's Hardship Fund have steadily declined over the  
15 past decade. To address these disparities, I recommended that FE PA increase its annual hardship  
16 funding to \$1 million, and to find solutions to address the decline in voluntary ratepayer  
17 contributions.<sup>30</sup> I specifically recommended through direct testimony that FE PA be required to  
18 explore improved solicitation through e-billing (including round-up and add-a-buck), and consider  
19 a plan for solicitation from large commercial and industrial entities. I recommended that FE PA be  
20 required to consult its USAC and develop a plan to increase voluntary contributions to its Hardship  
21 Fund, with a report being provided to the Commission within 6 months of the final order in this  
22 proceeding.<sup>31</sup>

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<sup>30</sup> CAUSE-PA St. 1 at 43: 1-14.

<sup>31</sup> Id.

1 Mr. Jones disagrees with my recommendations to improve solicitation for voluntary  
2 contributions to FE PA's Hardship Fund.<sup>32</sup> He argues that FE PA solicits contributions to its  
3 Hardship Fund once a year, in November, when it includes an insert in monthly bills to residential  
4 customers which encourages customers to donate to Dollar Energy Fund (DEF) - either directly or  
5 through a monthly bill donation. Mr. Jones further explains that e-billing customers receive an  
6 email notification which would advise them that bill inserts are available online for review.<sup>33</sup> Mr.  
7 Jones indicates that FE PA meets quarterly with its USAC to discuss universal service programs  
8 and is open to USAC feedback for how it can increase contributions from residential and  
9 commercial customers.<sup>34</sup>

10 **Q: What is your response to Mr. Jones's rebuttal testimony related to your**  
11 **recommendations to increase voluntary contributions to FE PA's Hardship Fund?**

12 A: While I appreciate Mr. Jones explanation related to FE PA's current efforts to solicit  
13 voluntary contributions for its Hardship Fund, these activities are insufficient to address the  
14 dramatic unmet need, or to reverse the historic decline in voluntary contributions . FE PA's current  
15 solicitation efforts are very limited – consisting of a single annual bill insert encouraging voluntary  
16 Hardship Fund contributions. If an e-billing customer opens their monthly bills, they must go  
17 through the additional step of accessing the electronic bill insert to learn about the opportunity to  
18 contribute. I note that many customers have enabled auto-payment options, and are unlikely to  
19 ever see these bill messages and attachments. FE PA's annual campaign is insufficient to address  
20 the significant need for additional hardship funding and must be augmented with additional efforts  
21 to solicit voluntary contributions. I note that Mr. Jones indicates that FE PA is not opposed to

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<sup>32</sup> FE PA St. 8-R at 17: 1-11.

<sup>33</sup> Id. at 17: 1-11.

<sup>34</sup> Id.

1 working with its USAC to develop a plan to increase voluntary residential and commercial  
2 contributions. Given FE PA's willingness to consult with its USAC related to these issues, and for  
3 the reasons indicated here and through my direct testimony, I stand by my recommendations that  
4 FE PA must improve voluntary contributions to its Hardship Fund.

5 **D. Universal Service Screening, Enrollment, and Retention**

6 **Q: Please summarize Mr. Jones's testimony related to your recommendations that FE PA**  
7 **develop a more structured process of regularly screening customers for eligibility in**  
8 **universal service programs, to which you wish to respond.**

9 A: In my direct testimony, I raised concerns that FE PA's EAOT proposal does not provide  
10 adequate specificity to ensure that the initiative, if approved, would meaningfully increase  
11 enrollment and participation in FE PA's universal service program.<sup>35</sup> I recommended that FE PA  
12 be required to set forth specific, measurable goals, if the EAOT were approved. Specifically, I  
13 recommended that FE PA adopt a routine screening process for all applicants and customers to  
14 assess eligibility for universal service programs on nonemergency calls or contacts with residential  
15 customers and applicants.<sup>36</sup> In conjunction with this routine screening, I recommended FE PA  
16 develop call scripting and checklists for its Customer Service Representatives (CSRs) to assist in  
17 screening customers for eligibility in universal service programs.<sup>37</sup> I emphasized that these  
18 improvements are necessary regardless of whether the EAOT is approved.<sup>38</sup>

19 Mr. Jones argues that my screening recommendations are unnecessary.<sup>39</sup> Mr. Jones explains  
20 that FE PA provides information about customers' rights and responsibilities at the time of move-

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<sup>35</sup> CAUSE-PA St. 1 at 52: 8-20.

<sup>36</sup> *Id.* at 55.

<sup>37</sup> *Id.* at 56: 1-11.

<sup>38</sup> *Id.* at 55-56.

<sup>39</sup> FE PA St. 8-R at 15: 1-12.

1 in.<sup>40</sup> Mr. Jones further explains that this information is included with the first bill, and includes  
2 information related to assistance programs, medical certificates, winter termination procedures,  
3 and several other collection related items.<sup>41</sup> Mr. Jones also points to outreach related to universal  
4 services conducted by FE PA.<sup>42</sup>

5 Mr. Jones similarly argues that my recommendation that FE PA develop scripting and  
6 checklists for CSRs is unnecessary because FE PA already has scripts built into their Customer  
7 Relationship Management (CRM) system that CSRs follow when customers indicate they are  
8 having trouble paying their bills, prompting CSRs to discuss available assistance programs.<sup>43</sup>

9 **Q: What is your response to Mr. Jones’s rebuttal testimony related to your universal**  
10 **service screening recommendations?**

11 A: I appreciate the additional information provided by Mr. Jones indicating that FE PA  
12 provides certain written information to customers at the time of move-in related to universal  
13 service programs, and that CSRs are trained to discuss assistance programs with customers  
14 indicating payment difficulties. However, these activities do not substitute for the need to  
15 implement routinized, regular screening for eligibility determination and placement into FE PA’s  
16 universal service programs. As discussed extensively in my direct testimony, FE PA’s low income  
17 customers are terminated at far higher rates, and carry far higher arrearage levels, compared to  
18 residential customers as a whole.<sup>44</sup> As of December 2023, residential customers (excluding PCAP  
19 and CLI customers), had an average arrearage level of \$417 compared to the average arrearage  
20 level of \$829 for confirmed low income customers and \$643 for PCAP customers.<sup>45</sup> To address

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<sup>40</sup> Id.

<sup>41</sup> FE PA St. 8-R at 15: 1-12.

<sup>42</sup> Id.

<sup>43</sup> FE PA St. 8-R at 11: 3-10.

<sup>44</sup> CAUSE-PA St. 1 at 16: 11-17.

<sup>45</sup> Id. at 17-18.

1 these stark disparities, it is imperative that FE PA implement improvements to more timely match  
2 eligible low income customers with available assistance.

3 While FE PA indicates that they discuss assistance programs with customers when they  
4 indicate payment difficulty, there is no indication that FE PA engages in broader screening for  
5 eligibility in assistance programs. Customers eligible for assistance should not have to wait until  
6 they fall into payment difficulties, and affirmatively reach out for help, to learn about the  
7 availability of assistance programs that can help make their rates more affordable. Similarly,  
8 providing residential customers written information related to their rights and responsibilities at  
9 the time of move-in does not substitute for customers being able to discuss universal service  
10 programs with a live CSR, nor does it obviate the need to provide additional screening and notice  
11 for customers who may find themselves in need of assistance long after service is initiated.  
12 Mailings, though important, tend to be general and do not provide customers with the opportunity  
13 to receive individually focused information, or to have questions asked and answered. Indeed, in  
14 reviewing FE PA's customer rights and responsibilities document, information about CAP is buried  
15 on page 18 of the document and includes only general information about CAP – without any  
16 specific contact information or details about FE PA's PCAP, Hardship Fund, or LIURP.<sup>46</sup> For these  
17 reasons and the reasons set forth in my direct testimony, I stand by my recommendations that FE  
18 PA be required to implement additional, systematic screening related to eligibility for its universal  
19 service programs.

20 **Q: Please summarize Mr. Jones rebuttal testimony that, if the EAOT is approved, certain**  
21 **PCAP enrollment goals should be implemented, to which you wish to respond.**

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<sup>46</sup> See Penelec, Your Rights and Responsibilities as a Utility Consumer, available at:  
<https://www.firstenergycorp.com/content/dam/customer/get-help/files/brochures/PA/PA-KnowYourRightsBookletPN.pdf>.

1 A: I raised concerns in my direct testimony that FE PA's EAOT proposal lacked crucial  
2 specificity to ensure that the initiative would meaningfully increase enrollment and participation  
3 in FE PA's universal service programs.<sup>47</sup> I recommended that FE PA, in consultation with its  
4 USAC, develop quantifiable goals and a plan for achieving those goals, memorialized in an EAOT  
5 implementation plan.<sup>48</sup> I specifically recommended that FE PA commit to achieving at least 10%  
6 annual increase in CAP enrollment rates, as measured against the estimated low income customers  
7 in each Rate District.<sup>49</sup> I similarly recommended that FE PA adopt additional quantifiable targets  
8 for outreach, education, and program enrollment/ retention, with a focus on reaching underserved  
9 populations across FE PA's service territory.<sup>50</sup>

10 In his rebuttal testimony Mr. Jones argues that my recommendation to set a PCAP  
11 enrollment goal of a 10% annual increase should be rejected.<sup>51</sup> He suggests my recommended  
12 implementation plan is duplicative of information already provided in this proceeding related to  
13 the EAOT.<sup>52</sup> Mr. Jones explains that FE PA intends to measure EAOT impact by monitoring the  
14 number of customers enrolled in the Company's universal service programs compared to historic  
15 numbers.<sup>53</sup> Despite this intended tracking, he argues that PCAP enrollment depends on variables  
16 outside of the Company's control, such the availability of state and federal funding and what is  
17 allowable through FE PA's USECP.<sup>54</sup> He argues that it is unclear how I determined 10% was the  
18 appropriate goal for PCAP enrollment increases.<sup>55</sup>

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<sup>47</sup> CAUSE-PA St. 1 at 52-54.

<sup>48</sup> Id. at 54.

<sup>49</sup> Id.

<sup>50</sup> Id.

<sup>51</sup> FE PA St. 8-R at 13-14.

<sup>52</sup> Id. at 14: 1-17.

<sup>53</sup> Id.

<sup>54</sup> Id.

<sup>55</sup> Id.

1 **Q: What is your response to Mr. Jones arguments against setting PCAP enrollment goals**  
2 **connected with the EAOT, as outlined?**

3 A: First, I do not agree that requiring FE PA to develop an implementation plan related to the  
4 EAOT would be duplicative of information FE PA has provided in this proceeding related to the  
5 proposal. As discussed at length in my direct testimony, FE PA's proposal notes only broad  
6 concepts and potential activities, without specific deliverables, identified timeframes, measurable  
7 goals, or quantifiable outcomes.<sup>56</sup> By contrast, the implementation plan I recommended in my  
8 direct testimony, would include measurable targets for outreach, education, and program  
9 enrollment/ retention designed and tailored to the underserved populations across FE PA's large  
10 and diverse service territory. Should FE PA fail to meet certain metrics, the implementation plan  
11 would also include specific commitments to review and adjust outreach activities and take further  
12 corrective action, where necessary.<sup>57</sup> Appropriate tracking and evaluation requires more than a  
13 simple calculation of the number of households enrolled.

14 I also disagree that it is inappropriate to set a target goal of a 10% annual increase to PCAP.  
15 Apart from the extraordinary relief available in the two years immediately following the pandemic,  
16 LIHEAP funding is generally consistent year over year and has been for decades. Absent another  
17 extraordinary event, it is unlikely new state or federal funds will be available in the near or long  
18 term. Even if more funding were made available, it would certainly be a factor for analysis in  
19 determining the reasons why FE PA was unable to meet its enrollment goal.

20 To gauge whether the EAOT is operating in a way to meaningfully increase universal  
21 service engagement and enrollment, I continue to recommend that benchmarks be set to quantify  
22 EAOT success.

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<sup>56</sup> CAUSE-PA St. 1 at 52-53.

<sup>57</sup> Id. at 54.

1 I have recommended setting a goal of 10% annual increase to PCAP enrollment based on  
2 FE PA's estimated low income customers to provide a measured and incremental way to address  
3 and bridge the considerable gap between FE PA's low income customers who are not enrolled in  
4 PCAP and the far fewer customers who have been able to successfully enroll in PCAP. For  
5 example, as of December 2023, 81,479 customers were enrolled in PCAP compared to FE PA's  
6 223,818 customers confirmed to be low income.<sup>58</sup> These significant disparities underscore the need  
7 to implement progressive steps to increase PCAP enrollment and retention. For these reasons and  
8 the reasons I set forth in my direct testimony, I stand by my recommended improvements to FE  
9 PA's EAOT – and to FE PA's outreach and screening related to its universal service programs.

10 **Q: Please briefly summarize Mr. Jones's rebuttal testimony related to your**  
11 **recommendations that FE PA utilize LIHEAP data for PCAP enrollment and retention, to**  
12 **which you wish to respond.**

13 A: As discussed extensively in my direct testimony, FE PA's universal service programs are  
14 woefully undersubscribed and reach just a fraction of FE PA's eligible low income customers.<sup>59</sup>  
15 Indeed, more than 100,000 customers that were *known* to be eligible for PCAP as of December  
16 2023, but were not enrolled in the program and will be subjected to the full unmitigated impacts  
17 of the proposed rate increase.<sup>60</sup> In addition to the screening recommendations, discussed above, I  
18 recommended that FE PA be required to leverage LIHEAP data from the Department of Human  
19 Services (DHS) to meaningfully improve enrollment and retention in PCAP, and in turn simplify  
20 the burdensome paperwork requirements and reduce duplicative administrative processes for  
21 PCAP.<sup>61</sup> I further recommended that FE PA be required to develop a seamless, concurrent, and

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<sup>58</sup> Id. at 22: 6-14.

<sup>59</sup> Id. at 52: 8-16.

<sup>60</sup> Id. at 22: 7-14.

<sup>61</sup> Id. at 56: 12-20.

1 immediate process utilizing shared LIHEAP data to process PCAP enrollments, and that FE PA be  
2 required to file a Petition within 90 days of the final order in this proceeding to amend its USECP  
3 to permit this process.<sup>62</sup>

4 Mr. Jones believes that the use of LIHEAP data to improve enrollment is unnecessary.<sup>63</sup>  
5 He argues that FE PA has already committed to utilizing LIHEAP data for PCAP recertifications  
6 in the context of its consolidation proceeding.<sup>64</sup> Mr. Jones explains that the Commission's Order  
7 related to its 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, at  
8 Docket No. M-2023-3038944, required utilities to file a letter by July 31, 2024, explaining how  
9 LIHEAP data sharing will be used, and that utilities are required to incorporate this process in their  
10 next filed USECP.<sup>65</sup>

11 **Q: What is your response to Mr. Jones's rebuttal testimony related to your**  
12 **recommendations that FE PA utilize LIHEAP data for PCAP enrollment and retention, as**  
13 **you have outlined.**

14 A: I stand by my recommendations that FE PA implement processes and procedures for the  
15 use of LIHEAP data to both enroll *and* recertify customers in PCAP. As a threshold matter, I note  
16 that the Commission's July 13 Order related to LIHEAP data sharing indicated that utilities  
17 participating in LIHEAP data sharing are required to file a letter at their current/pending USECP  
18 dockets. Subsequently, those utilities' choosing to participate in LIHEAP data sharing are  
19 directed to include information and clarification related to the data sharing in their next proposed  
20 USECP.<sup>66</sup> Thus, utilities are not required to wait until their next USECPs to implement LIHEAP

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<sup>62</sup> Id. at 57-58.

<sup>63</sup> FE PA St. 8-R at 16: 1-13.

<sup>64</sup> Id.

<sup>65</sup> Id.

<sup>66</sup> 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Order, Docket No. M-2023-3038944, at 6 (Order entered June 13, 2024).

1 data sharing. Rather they can indicate in required letters if any amendments to USECPs are  
2 required.

3 In FE PA's July 31, 2024, Letter at Docket No. M-2023-3038944, FE PA explains that it  
4 plans to implement the following processes, though FE PA's timeline for implementation is  
5 unclear.<sup>67</sup>

- 6 • Validation of data and adding matching SAP fields upon the receipt of monthly files from  
7 DHS;
- 8 • For existing PCAP participants, processing of recertification to update household and  
9 income information and assignment of a new recertification data without requiring  
10 additional income information/ documentation;
- 11 • For non-PCAP participants, triggering of an automatic letter to encourage PCAP  
12 enrollment through the use of a streamlined application;
- 13 • Utilization of LIHEAP data by DEF to process PCAP applications, so that income  
14 documentation will not be required unless applicants indicate changes to household  
15 income;
- 16 • Mailing of letters when LIHEAP data is used to complete PCAP application/  
17 recertification to advise customers that LIHEAP data was utilized in this manner and to  
18 advise customers how they can provide updates to household income/ size;
- 19 • Utilization of LIHEAP data related to customer outreach/ engagement.

20 While FE PA proposes to utilize LIHEAP data to provide new PCAP applicants with a  
21 *streamlined* application process, FE PA does not propose to utilize LIHEAP data to *automate*  
22 PCAP enrollments, as I recommended in my direct testimony. It is also unclear whether FE PA  
23 intends to implement the above processes in a timely manner – prior to filing its *next* quinquennial  
24 USECP, which is not due to be filed until November 1, 2029, with an effective date for January 1,  
25 2031. FE PA should develop and implement a process to utilize LIHEAP data provided by DHS  
26 to facilitate both recertification *and* autoenrollment in a timely manner, consistent with my initial  
27 recommendations. These improvements are critical to help reduce the financial impact of any rate  
28 increase and will help reduce the deep enrollment gap and ensure households known to be eligible

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<sup>67</sup> FirstEnergy PA Joint Proposed Universal Service and Energy Conservation Plan for 2024-2028, Letter, Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535 (Letter dated July 31, 2024).

1 for PCAP are able to enroll without barriers or delay. Thus, I stand by my recommendations in my  
2 direct testimony that FE PA be required to utilize LIHEAP data provided by DHS to facilitate  
3 autoenrollment and auto-recertification for its PCAP.

4 **E. Administration of Universal Service Programs**

5 **Q: Please summarize Mr. Jones’s rebuttal testimony related to your recommendations**  
6 **that FE PA improve its policies and procedures related to administration of its universal**  
7 **service programs, to which you wish to respond.**

8 A: In my direct testimony, I expressed concern that DEF’s policies and procedures for  
9 verifying income eligibility for FE PA’s programs are improperly restricting enrollment in these  
10 programs.<sup>68</sup> To address these concerns, I recommended that FE PA be required to conduct regular  
11 monitoring and oversight of DEF’s administration of its programs.<sup>69</sup>

12 Mr. Jones disagrees with my recommendations to improve monitoring of DEF’s  
13 administration of FE PA’s universal service programs. Mr. Jones argues that it is not clear which  
14 DEF requirements are of concern, as FE PA’s USECP does not specifically list income  
15 documentation that would be acceptable to determine household eligibility.<sup>70</sup> Mr. Jones  
16 nonetheless notes that FE PA’s quarterly USAC may be a setting to review this issue.<sup>71</sup>

17 **Q: What is your response to Mr. Jones arguments against your recommendations to**  
18 **improve FE PA’s policies and procedures relate to DEF’s administration of its universal**  
19 **service programs?**

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<sup>68</sup> CAUSE-PA St. 1 at 58-59.

<sup>69</sup> Id. at 58-60.

<sup>70</sup> FE PA St. 8-R at 22.

<sup>71</sup> Id.

1 A: Mr. Jones is correct that FE PA's USECP does not provide details related to acceptable  
2 forms of income verification or documentation. However, the absence of information is itself a  
3 concern as these requirements are threshold considerations for whether low income customers can  
4 successfully enroll in available assistance programs, and must be regularly reviewed and  
5 monitored to ensure that low income customers are not facing restrictive barriers to program  
6 enrollment. Notably, concerns about DEF's additional enrollment requirements were not the only  
7 concerns raised in my direct testimony.

8 While I agree FE PA's USAC should be consulted on matters relating to DEF's program  
9 administration, it is essential that these issues are addressed in the context of the present case to  
10 ensure rate assistance is available to serve the increased need that will likely result from any  
11 approved rate increase. I stand by the recommendations in my direct testimony related to improved  
12 oversight of DEF's administration of FE PA's universal service programs.

13 **F. Customer Service Issues – Customer Notices and Communications**

14 **Q: Please briefly summarize Mr. Jones's rebuttal testimony related to your**  
15 **recommended improvements to FE PA's customer notices, to which you wish to respond.**

16 A: In my direct testimony, I raised concerns that FE PA's residential customer notices do not  
17 accurately reflect medical certificate requirements set forth by statute and Commission  
18 regulation.<sup>72</sup> I recommended that FE PA be required to review all customer notices and  
19 communications, and make revisions throughout. I recommended that these revisions be filed with  
20 the Commission at this docket no later than 3 months from the final order in this proceeding.<sup>73</sup>

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<sup>72</sup> CAUSE-PA St. 1 at 60-61.

<sup>73</sup> Id. at 62: 1-13.

1 Mr. Jones's disagrees with my recommendations, and argues that FE PA will not terminate  
2 service if medical certificates are provided – regardless of whether the customers have made a  
3 payment or an equitable arrangement to pay their bills during the length of the medical certificate.<sup>74</sup>  
4 He argues that FE PA communicates to customers through these notices/communications, as well  
5 as by calls to customers about payment requirements connected with medical certificates.<sup>75</sup> He  
6 also argues that various notices, including FE PA's 3-day shutoff notice and digital notices, contain  
7 information related to assistance programs.<sup>76</sup>

8 **Q: What is your response to Mr. Jones's arguments that FE PA's notices and customer**  
9 **communications accurately reflect medical certificate requirements, and are not in need of**  
10 **revision?**

11 A: I continue to be concerned that the language provided by FE PA's customer  
12 communications and notices do not provide accurate information related to payment requirements  
13 for medical certificates. Again, the plain language contained in these notices and communications  
14 inform customers that they are required to make payments on their accounts, or an equitable  
15 arrangement to pay on their accounts, *before* they are able to access protection of a medical  
16 certificate. This is contrary to statute and Commission regulation, which requires utilities to apply  
17 protections as soon as they are notified that the household is seeking a medical certificate.<sup>77</sup> While  
18 FE PA indicates that it attempts to follow up via phone with customers related to certain notices,  
19 there is no guarantee that FE PA is able to later connect with the consumer or otherwise rectify the  
20 incorrect information provided in their written notices and communications to ensure households  
21 know they may obtain emergency medical protections even if they are unable to make a payment.

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<sup>74</sup> FE PA St. 8-R at 5-6.

<sup>75</sup> Id.

<sup>76</sup> Id.

<sup>77</sup> See 52 Pa. Code § 56.112; 66 Pa. C.S. § 1406(f).

1 FE PA providing information about assistance programs in various notices and  
2 communications does not detract from the need to accurately convey information related to the  
3 essential emergency protection provided by medical certificates to customers. The language of FE  
4 PA's notices and communications related to medical certificates is, on its face, incorrect and must  
5 be revised. This plain language may lead customers who without any available funds – who may  
6 be most in need of medical protections – to forgo pursuit of this important and life-saving  
7 protection. I stand by my recommendations that FE PA be required to undertake a review of all  
8 customer notices and communications and make revisions to language related to medical  
9 certificate requirements throughout.

10 **G. Customer Service Issues – Confirmed Low Income and Winter Moratorium**

11 **Q: Please briefly summarize Mr. Jones's rebuttal testimony related to your**  
12 **recommendations to improve FE PA's policies and procedures for identifying confirmed low**  
13 **income customers and applying winter moratorium protections for these customers, to which**  
14 **you wish to respond.**

15 A: In my direct testimony, I explained that FE PA terminated a sizable number of confirmed  
16 low income customers for nonpayment during the winter months, despite statutory and regulatory  
17 requirements to protect confirmed low income customers during the winter moratorium.<sup>78</sup> In  
18 addition, I explained that FE PA's definition of confirmed low income customers is far more  
19 restrictive than the Commission's definition. FE PA's restrictive definition results in the circular  
20 underestimation of need, underapplication of statutory protections (e.g., low income security

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<sup>78</sup> CAUSE-PA St. 1 at 65: 3-18.

1 deposit prohibition and winter protections), and under-accounting of low income collections and  
2 termination rates.

3 For regulatory and reporting requirements, FE PA classifies customers as confirmed low  
4 income if they are enrolled in PCAP, receive LIHEAP assistance, or are in an income based-  
5 payment arrangement. For applying statutory and regulatory prohibitions of collecting security  
6 deposits, FE PA defines confirmed low income to include only those customers who are enrolled  
7 in PCAP or have received a LIHEAP grant designated to FE PA.<sup>79</sup> I recommended that FE PA  
8 adopt a consistent definition of confirmed low income consistent with the Commission's  
9 regulations, as well as include customers who can reasonably be identified as low income through  
10 several specific means outlined in my direct testimony.<sup>80</sup>

11 Mr. Jones's disagrees with my concerns and recommendations related to FE PA's definition  
12 of confirmed low income customers, and with my concern that confirmed low income customers  
13 are being terminated during the winter moratorium.<sup>81</sup> He argues that in all disclosed terminations  
14 that occurred during the winter moratorium for confirmed low income customers, the Company  
15 was made aware of the customers' low income status after termination occurred.<sup>82</sup> He  
16 acknowledges that, had these customers been identified as confirmed low income prior to  
17 termination, they would have been protected by the winter moratorium.<sup>83</sup>

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<sup>79</sup> Id. at 8-9.

<sup>80</sup> Id. at 66: 6-26.

<sup>81</sup> FE PA St. 8-R at 7: 5-16.

<sup>82</sup> Id.

<sup>83</sup> Id.

1 **Q: What is your response to Mr. Jones’s arguments against your recommendations to**  
2 **improve FE PA’s policies and procedures related to confirmed low income customers**  
3 **identification and application of winter moratorium protections, as you have outlined?**

4 A: I continue to be concerned about FE PA’s policies and procedures related to identification  
5 and treatment of confirmed low income customers during the winter moratorium. In fact, Mr.  
6 Jones’s clarification doesn’t actually rebut my concern that low income customers are being  
7 terminated during the winter moratorium – it essentially corroborates it. FE PA reporting that low  
8 income customers are being terminated during the winter moratorium, and then reaching out to FE  
9 PA and being identified as confirmed low income, speaks directly to the critical need for FE PA to  
10 routinely screen and identify low income customers so that they can receive protections and  
11 assistance for which they are entitled – *before termination occurs*. Termination in the winter  
12 months is particularly dangerous to the health, safety, and general welfare of the customer and the  
13 surrounding community, and results in substantial additional fees and related costs. There is  
14 nothing after the fact that can be done to correct death or permanent harm from hypothermia, and  
15 therefore statutory mandates, public policy, and Commission regulations are aimed to *prevent*  
16 winter termination. As discussed in my direct testimony, FE PA should be required to make  
17 important revisions to its screening, enrollment, and retention policies and procedures related to  
18 its categorization and tracking of low income customers so that the Company can better identify  
19 low income customers, apply statutory and regulatory protections, and enroll them in available  
20 assistance. I have also recommended that FE PA be required to adopt the broader definition of  
21 confirmed low income customers consistent with the Commission’s regulations.

1                   **H. Customer Service Issues -- Reconnection Fees**

2   **Q:     Please summarize Mr. Jones’s rebuttal testimony in response to your recommended**  
3 **improvements to FE PA’s reconnection fees charged to confirmed low income customers, to**  
4 **which you wish to respond.**

5   A:     I in my direct testimony, I disagreed with FE PA’s proposal in regard to a reduced  
6 reconnection fee of \$15.<sup>84</sup> I explained that reconnection fees present a substantial barrier to  
7 reconnection for low income customers, who are terminated at far greater rates and reconnected at  
8 far lower rates compared to residential customers as a whole.<sup>85</sup> I recommended through direct  
9 testimony that FE PA waive all reconnection fees for confirmed low income customers.<sup>86</sup>

10           Mr. Jones argues that my recommendation that FE PA waive all reconnection fees for  
11 confirmed low income customers improperly focuses on impacts to low income customers.<sup>87</sup> Mr.  
12 Jones incorrectly claims that I want non-low income residential customers to keep paying higher  
13 reconnection fees to make up for the lost fees associated with my proposal to waive reconnection  
14 fees for confirmed low income customers.<sup>88</sup> Mr. Jones also argues that waiving reconnection fees  
15 would not have the greatest impact on the ability of confirmed low income customers to get  
16 restored, but rather points to the need to control customer arrears, keep cost of service restoration  
17 manageable, and implement the proposed EAOT.<sup>89</sup>

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<sup>84</sup> CAUSE-PA St. 1 at 69: 12-18.

<sup>85</sup> *Id.* at 69: 12-18, 70, T17.

<sup>86</sup> *Id.* at 71: 3-14.

<sup>87</sup> FE PA St. 8-R at 31: 8-21.

<sup>88</sup> *Id.* at 31-32.

<sup>89</sup> *Id.* at 32: 1-8.

1 **Q: What is your response to Mr. Jones’s arguments against waiving reconnection fees for**  
2 **confirmed low income customers, as you have outlined?**

3 A: As a threshold matter, I never suggested that the reconnection fees for non-low income  
4 customers remain at their currently inflated rates to subsidize waiver of reconnection fees for  
5 confirmed low income customers. FE PA should implement its proposed reconnection fee for these  
6 customers. Moreover, I disagree that waiving reconnection fees for low income customers will not  
7 have a substantial impact on the ability of low income customers to reconnect. In my direct  
8 testimony I detail the financial constraints and economic hardships which FE’s low income  
9 customers face. A reconnection fee is a component of the total cost to connect to and maintain  
10 service and does add a significant additional cost burden. I believe that it is essential to address  
11 the high arrearage balances that ultimately lead to termination, and to implement meaningful  
12 customer outreach, screening, and engagements to ensure that low income customers are timely  
13 matched with assistance before payment troubles occur. I have proposed recommendations  
14 throughout my direct testimony to help address these issues in light of FE PA’s unaffordable rates  
15 – both at present and as proposed. However, as explained above, Mr. Jones has rejected most of  
16 these recommendations – arguing there is no need to further improve upon FE PA’s existing  
17 systems.

18 For the many low income customers who are terminated for nonpayment as a result of  
19 accrual of unmanageable arrears, reconnection fees pose a substantial and punitive barrier to  
20 reestablish service. It is unjust and unreasonable to continue to penalize low income customers for  
21 not being able to pay bills they cannot afford to pay, terminating service based on nonpayment of  
22 unaffordable charges, and ultimately adding even more charges to their reconnection amounts in

1 the form of reconnection fees. Thus, I stand firmly by my recommendation that FE PA be required  
2 to waive reconnection fees for confirmed low income customers.

3 **Q: Please summarize Mr. Jones’s rebuttal testimony to your recommended**  
4 **improvements to FE PA’s policies and procedures related to field contact with Limited**  
5 **English Proficient (LEP) customers, to which you wish to respond.**

6 A: In my direct testimony, I raised concerns that FE PA is not adequately engaging with LEP  
7 customers and providing these customers with essential information related to their services.<sup>90</sup>  
8 Specifically, I expressed concern that FE PA’s policies and procedures for its field representatives  
9 do not provide for important translation and interpretation.<sup>91</sup> I recommended that FE PA be directed  
10 to undertake a full review of policies, procedures, and attendant training materials, to ensure that  
11 its field representatives are provided with clear and robust information for how to communicate  
12 with LEP customers, including how to access telephonic interpretation services utilized by FE  
13 PA.<sup>92</sup>

14 In response to my testimony and recommendations, Mr. Jones indicates that FE PA does  
15 not have formal training for field representatives.<sup>93</sup> He argues that field representatives  
16 nevertheless effectively communicate with LEP customers through “available translation  
17 resources.”<sup>94</sup> He also argues that FE PA provides multiple opportunities to communicate with the  
18 Company through telephonic interpreter services at any time when the call center is open, and that  
19 notices contain some Spanish translation.<sup>95</sup>

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<sup>90</sup> CAUSE-PA St. 1 at 62-64.

<sup>91</sup> Id. at 63: 3-18.

<sup>92</sup> Id. at 64: 3-12.

<sup>93</sup> FE PA St. 8-R at 36: 9-21.

<sup>94</sup> Id.

<sup>95</sup> FE PA St. 8-R at 36-37.

1 **Q: What is your response to Mr. Jones’s rebuttal testimony related to your recommended**  
2 **improvements to field representative contacts with LEP customers, as you have outlined?**

3 A: First, it is unclear why FE PA has not implemented formal training for field representatives.  
4 These representatives are tasked with essential customer communications and are oftentimes the  
5 last point of contact with customers immediately prior to service termination. Field representatives  
6 are responsible for communicating a host of essential information to customers related to service  
7 termination, methods to prevent terminations, available assistance programs, and available  
8 protections based on certain customer statuses – including if customers have household members  
9 with medical conditions or is a victim of domestic violence. It is essential that FE PA develop and  
10 implement formal, periodic training for its field representatives. I recommend that FE PA be  
11 required to develop and implement this training within 3 months of the final order in this  
12 proceeding.

13 I continue to be concerned that FE PA is not adequately accounting for its LEP customers  
14 in its policies and procedures for its field representatives. Without formal training, it is unclear  
15 what translation resources the field representatives are relying on, and whether they are in fact  
16 relying on improper resources for interpretation services, such as communication with children or  
17 neighbors. The fact that FE PA may be providing translation and interpretation service through  
18 other avenues, including through its call centers and in Spanish language included on certain  
19 limited notices, does not detract from the need of its field representatives to be able to effectively  
20 communicate with LEP customers. FE PA must ensure that its field representatives are empowered  
21 with robust tools so that they can communicate vital information with LEP customers. Thus, I  
22 stand firmly by my recommendations to improve FE PA’s policies and procedures for its field  
23 representatives related to LEP customers. As part of the formal training for field representatives I

1 have recommended above, FE PA should be required to implement regular and formal training for  
2 all field representatives for how to communicate with LEP customers if they are not fluent in the  
3 customer's preferred language, including how field representatives can access telephonic  
4 interpretation services utilized by FE PA.

5 **I. EV Pilot**

6 **Q: Please briefly summarize Mr. Jones's rebuttal testimony in response to concerns you**  
7 **have raised related to FE PA's Electric Vehicle (EV) Pilot proposal, to which you respond.**

8 A: In my direct testimony, I raised concerns regarding FE PA's EV Pilot proposal that (1) low  
9 income households are not equitably able to access EVs and transportation electrification; (2) are  
10 unlikely to see direct benefits from FE PA's EV Pilot proposals; and (3) and that FE PA's proposed  
11 EV Pilot components related to nonresidential entities do not provide needed specificity to ensure  
12 that benefits are committed to and realized by low income households and communities.<sup>96</sup> I  
13 recommended that, if the EV Pilot proposal is approved, FE PA's confirmed low income customers  
14 should be excluded from paying for the costs of the EV Pilot.<sup>97</sup> I further recommended that FE PA  
15 be required to devote at least 50% of the fleet and public transportation incentives to entities  
16 situated in or which primarily service Environmental Justice (EJ) communities.<sup>98</sup>

17 Mr. Jones argues against my assessment, and the assessment of OCA witness Alexander  
18 and I&E witness Wilson, that the EV Pilot proposal will harm low income customers because they  
19 will pay for programs that they are unable to utilize or benefit from.<sup>99</sup> Mr. Jones argues that (1)  
20 EVs are becoming more affordable and quickly becoming an option for low income customers;

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<sup>96</sup> CAUSE-PA St. 1 at 74-76.

<sup>97</sup> Id. at 77: 1-7.

<sup>98</sup> Id.

<sup>99</sup> FE PA St. 8-R at 44: 7-11, citing CAUSE-PA St. 1 at 74-82; OCA St. 6 at 1; I&E St. 4 at 54-55.

1 (2) certain federal and statewide incentives and credits are available for new and used EVs; (3)  
2 Level 1 charging is available to low income customers; (4) the EV Pilot would provide additional  
3 health benefits to low income and rural communities; and (5) EVs save drivers in fuel and  
4 maintenance costs.<sup>100</sup> Mr. Jones also argues that the structure for recovering the EV Pilot would  
5 distribute costs within customer classes that benefit from the program design, and therefore most  
6 of the EV Pilot expenses would be recovered through commercial rates.<sup>101</sup> Mr. Jones indicates that  
7 the commercial and public rebates will assist low income and rural areas in need of EV charging  
8 infrastructure – thereby encouraging travelers to stop and charge EVs and increasing  
9 traffic/revenues to local businesses.<sup>102</sup> Finally, Mr. Jones points to the Company’s proposal that it  
10 will allocate 35% of approved marketing dollars and promotional efforts to EJ area  
11 communities.<sup>103</sup>

12 **Q: What if your response to Mr. Jones’s arguments against your assessment that the EV**  
13 **Pilot Program will negatively impact low income customers, as you have outlined?**

14 A: I continue to be concerned that FE PA’s low income customers will not be able to realize  
15 direct, tangible benefits from the EV Pilot proposal, while being required to share in the costs of  
16 this proposal. I do not disagree with Mr. Jones that the overall cost of purchasing an EV has slightly  
17 declined and is in closer parity with gas and hybrid vehicles. However, even at median household  
18 income, many families cannot afford the price of a new or used vehicle.<sup>104</sup> From my extensive  
19 experience representing low income consumers, low income families subsist on income far below

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<sup>100</sup> Id. at 44-45.

<sup>101</sup> Id. at 45: 10-12.

<sup>102</sup> Id. at 45: 18-23.

<sup>103</sup> Id. at 46: 1-7.

<sup>104</sup> Sarah O’Brien, That shiny new car is out of reach of many families, CNBC, July 3, 2017, available at: <https://www.cnbc.com/2017/06/28/that-shiny-new-car-is-out-of-reach-for-many-americans.html>.

1 what is required to pay for basic necessities. For many of these families, even used car ownership  
2 and the costs of the required maintenance is out of reach.

3 The vast majority of low income customers who can currently not participate in the EV  
4 market as a result of the high upfront cost of EVs will also not be able to access the benefits of EV  
5 ownership that Mr. Jones touts. Mr. Jones's touting of diffuse community benefits of EV  
6 infrastructure – including overall emission reductions and increased business traffic – also does  
7 not rise to the level of direct benefits to low income families. While I appreciate that 35% of the  
8 marketing budget will be used to target benefits in EJ areas, this is not the same as dedicating  
9 explicit funds to actually serve those areas. It is essential that initiatives aimed at transportation  
10 electrification provide a clear and direct benefit to low income customers – especially when low  
11 income consumers are expected to share in the costs.

12 **III. RESPONSE TO I&E ST 1 (VANESSA OKUM) (PUBLIC)**

13 **Q: Please summarize the rebuttal testimony of Ms. Vanessa Okum, witness for I&E, to**  
14 **which you wish to respond.**

15 A: Ms. Okum argues that I have set forth several recommendations which would negatively  
16 impact ratepayers.<sup>105</sup> In particular, Ms. Okum points to my recommendations that FE increase  
17 funding to support emergency grant assistance and comprehensive usage reduction services to help  
18 lessen the financial burden of any approved rate increase.<sup>106</sup> Ms. Okum argues that it is  
19 inappropriate to consider an increase in any part of the universal service plan budget in this base  
20 rate proceeding.<sup>107</sup> Ms. Okum points to Commission decisions, and a statement by Commissioner

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<sup>105</sup> I&E St. 1 at 2. (Public).

<sup>106</sup> Id.

<sup>107</sup> I&E St. 1 at 3. (Public).

1 John F. Coleman, Jr. issued in review of an approved rate case settlement in support of her  
2 position.<sup>108</sup>

3 In support of her contention, Ms. Okum primarily advances legal arguments, and cites to  
4 the pending Notice of Proposed Rulemaking for the *Initiative to Review and Revise the Exhibit*  
5 *Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1-58.18*.<sup>109</sup> In  
6 the cited proposed rulemaking, the Commission initially proposed the following: “LIURP budget  
7 can only be revised through USECP proceedings initiated pursuant to the periodic USECP review  
8 process or in response to a petition to amend a USECP earlier than the periodic USECP review  
9 process.”<sup>110</sup>

10 Finally, in support of her position, Ms. Okum points to FE PA’s pending 2024-2028 USECP,  
11 which was ultimately approved and final as of July 11, 2024.<sup>111</sup>

12 **Q: What is your response to Ms. Okum’s arguments against review of FE PA’s universal**  
13 **service programs in the context of the present case?**

14 A: As I discussed above in response to FE PA expert witness Jones, Ms. Okum’s assertions  
15 that universal service issues should not be considered within the context of base rate proceedings  
16 would serve to preclude important consideration of whether rates and terms and conditions of  
17 service for low income customers are just, reasonable, and in the public interest. Any evaluation

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<sup>108</sup> *Id.* at 4. (Public), citing *PA Public Utility Commission et al. v. Aqua Pennsylvania, Inc.*, Docket No. R-2021-3027386, p. 333 (Order Entered May 16, 2022). *PA Public Utility Commission v. PECO Energy Company – Gas Division*, Docket No. R-2020-3018929, pp. 195-196 (Order Entered June 22, 2021). *PA Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2020-3018835, p. 160 (Order Entered February 19, 2021). *PA Public Utility Commission v. PECO Energy Company – Gas Division*, Docket No. R-2020-3018929, p. 195 (Order Entered June 22, 2021). *PA Public Utility Commission v. UGI, Utilities Inc. – Electric Division*, Docket No. R-2022-3037368, et al., Statement of Commissioner John F. Coleman, Jr., September 21, 2023.

<sup>109</sup> I&E St. 1 at 5. (Public), citing Notice of Proposed Rulemaking for the *Initiative to Review and Revise the Exhibit Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1-58.18*, p. 36 (Order Entered May 18, 2023).

<sup>110</sup> Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1—58.18, Notice of Proposed Rulemaking, Docket No. L-2016-2557886, at 36 (NOPR entered on May 18, 2023).

<sup>111</sup> I&E St. 1 at 6-7. (Public).

1 of the justness and reasonableness of existing and proposed rates must necessarily analyze the  
2 adequacy and design of rate assistance programming to ensure that basic energy services are  
3 reasonably affordable and universally accessible to FE PA's customers. In addition, as I have  
4 discussed above, consideration of universal service issues in the context of base rate proceedings  
5 is necessary to fulfill the Commission's statutory mandate to ensure that base rates – and the  
6 attendant rules, regulations, and procedures which affect them – are just, reasonable, and in the  
7 public interest. To be just and reasonable, rates approved in this proceeding must be affordable and  
8 accessible to those served at the time of rate implementation. Deferring consideration of universal  
9 service improvements, including improvements to FE PA's Hardship Fund and LIURP, to a future  
10 proceeding is inappropriate and fails to address both existing need and additional burden as a result  
11 of any approved rate increase amongst FE PA's low income customers for assistance necessary to  
12 stay connected and afford services.

13 I also firmly disagree with Ms. Okum's implication that my recommended improvements  
14 to the funding levels of FE PA's LIURP and Hardship Fund will have a negative impact on FE PA's  
15 ratepayers. Robust universal service programs are designed to ensure that services are universally  
16 accessible and affordable to all residential ratepayers. As discussed at length in my direct  
17 testimony, FE PA's low income customers carry disproportionate amounts of residential customer  
18 debt and are far more likely to have their service involuntarily terminated for nonpayment.<sup>112</sup> If  
19 FE PA's proposed rate increase is approved without addressing these affordability and accessibility  
20 concerns at both present and proposed rates, low income customers are likely to experience even  
21 greater rates of payment troubles and involuntary terminations. These disparities ultimately

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<sup>112</sup> CAUSE-PA St. 1 at 16-19.

1 increase the risk to low income customers, their families, and their communities as a whole – and  
2 result in corresponding levels of uncollectible expenses which are recovered from all ratepayers.<sup>113</sup>

3 I also note that Ms. Okum’s arguments are primarily legal in nature - citing to dicta from  
4 various Commission Orders, language in a *proposed* (but not final) rulemaking, and a  
5 Commissioner’s non-precedential statement in approving a recent utility rate case settlement. As I  
6 am advised that Counsel for CAUSE-PA will address these legal arguments through briefing, I shall  
7 not address them. However, I note that numerous commenters to the Commission’s proposed  
8 rulemaking opposed the proposed language Ms. Okum cites in testimony.<sup>114</sup>

9 **IV. CONCLUSION**

10 **Q: Does this conclude your surrebuttal testimony?**

11 A: Yes.

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<sup>113</sup> Id.

<sup>114</sup> Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations Pa. Code §§ 58.1—58.18, Comments of the Consumer Advisory Council at 2-3; Joint Comments of the Commission on Economic Opportunity and Pa. Weatherization Providers Task Force, at 3-5; Comments of OCA, at 20-23; Comments of the Tenant Union Representative Network, at 5-6; Comments of Energy Justice Advocates, at 3; Comments of the Pa. Coalition of Local Energy Efficiency Contractors, Inc. at 7 (Comments Respectively filed, January 16, 2024); see also Comments of the Independent Regulatory Review Commission at 4 (filed March 18, 2024).

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 **v.** : **Docket No. R-2024-3047068**  
 :  
 **First Energy Pennsylvania Electric** :  
 **Company** :

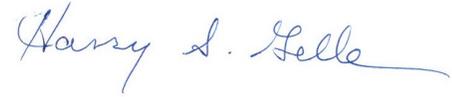
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**VERIFICATION**

I, Harry S. Geller, Esq., verify that the following testimony, exhibit, and appendices were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter:

- Direct Testimony of Harry S. Geller, Esq. on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 1)
  - 82 pages of written testimony
  - CAUSE-PA Exhibit 1: Energy Burden Charts
  - Appendix A: Resume, Harry S. Geller, Esq.
  - Appendix B: Cited Discovery Responses
- Surrebuttal Testimony of Harry S. Geller, Esq. on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 1-SR)
  - 38 pages of written testimony

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink that reads "Harry S. Geller". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Dated: August 13, 2024

Harry S. Geller, Esq.