



**February 27, 2025**

To: All Parties of Record at Docket Nos.:  
P-2024-3052623, M-2022-3036532, M-2022-3036533, M-2022-3036534, &  
M-2022-3036535  
FirstEnergy PA's 2024-2028 USECP

**RE: Revised Petition to Amend the FirstEnergy PA 2024-2028 USECP**

*Overview*

In Orders entered on March 14, 2024 and July 11, 2024, the Pennsylvania Public Utility Commission (Commission) approved FirstEnergy Pennsylvania Electric Company's (FirstEnergy PA's) current 2024-2028 Universal Service and Energy Conservation Plan (2024 USECP), which was last revised on October 7, 2024 and remains in effect.

On April 2, 2024, FirstEnergy PA filed for a general rate increase at Docket No. R-2024-3047068. On September 13, 2024, a Joint Petition for Settlement of All Issues (2024 Rate Case Settlement)<sup>1</sup> was filed, which included, *inter alia*, provisions impacting FirstEnergy PA's universal service programs and consumer education and outreach initiatives. On October 15, 2024, Administrative Law Judges Katrina L. Dunderdale and Emily I. DeVoe issued a Recommended Decision (October 2024 RD) recommending, *inter alia*, approval of those provisions in the 2024 Rate Case Settlement. By Order entered on November 21, 2024 (November 2024 Order), the Commission approved, *inter alia*, the 2024 Rate Case Settlement. November 2024 Order at 2, OP #2.

As articulated in the 2024 Rate Case Settlement, FirstEnergy PA agreed, *inter alia*, to make the following changes to its universal service program funding, policies, and procedures:

- Review and adjust its PCAP rates based on the new, applicable base rates to ensure all PCAP customers are receiving the most advantageous CAP rate available. 2024 Rate Case Settlement at 16, ¶59(a). FirstEnergy PA also agreed to incorporate these changes into its 2024 USECP by no later than the effective date of its base rate change (*i.e.*, January 1, 2025). 2024 Rate Case Settlement at 16, ¶59(b).

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<sup>1</sup> The Settlement is supported by all active parties in the case: FirstEnergy PA, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), the Office of Consumer Advocate (OCA), the Office of Small Business Advocate (OSBA), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), the Large User Groups, the International Brotherhood of Electric Workers Local 459 (IBEW 459), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO (IBEW Local 777), the UWUA System Local 102 (UWUA 102), Walmart, Inc. (Walmart) and the Pennsylvania State University (PSU), collectively the Joint Petitioners or the Parties). 2024 Rate Case Settlement at 40-41.

- Amend the Hardship Fund’s seasonal parameters so that customers whose electric service is off or who are at risk of termination can qualify for a Hardship Fund grant in any month of the year. 2024 Rate Case Settlement at 17, ¶60(b).
- Increase its annual shareholder Hardship Fund matching contribution for grant assistance to \$500,000 annually. 2024 Rate Case Settlement at 17, ¶60(d).
- Make an annual shareholder Hardship Fund contribution for grant assistance over routine funding levels in the amount of \$2,000,000 annually for a three-year period beginning in 2025. 2024 Rate Case Settlement at 17, ¶60(e).
- Roll over any unspent Hardship Fund monies remaining at the end of the program year and add them to the Hardship Fund budget for the following year. 2024 Rate Case Settlement at 17, ¶60(f).
- Increase the maximum Hardship Fund grant to \$600. 2024 Rate Case Settlement at 17, ¶60(g).
- Eliminate any prohibitions against PCAP customers receiving a Hardship Fund grant within ninety days of the Commission’s entry of a rate case final order (*i.e.*, February 21, 2025). 2024 Rate Case Settlement at 18, ¶60(h).
- Leverage DHS LIHEAP data to improve PCAP enrollment and retention, simplify paperwork requirements, and reduce duplicative administrative costs. 2024 Rate Case Settlement at 20-21, ¶62(a).
- Amend the tariff regarding cash security deposits to require that (a) FirstEnergy PA will not require a customer to provide a cash deposit when the customer provides information that demonstrates they qualify as confirmed low income (CLI); and that (b) any customer who has previously paid a cash security deposit and is found to be newly exempt from a deposit will be refunded that deposit within thirty days of identifying as CLI. FirstEnergy PA will issue security deposit refunds directly to the customer, unless informed consent is obtained to apply the security deposit to the customer’s account balance. 2024 Rate Case Settlement at 23, ¶66.
- Allow Hardship Fund grants to be used for payment of reconnection fees for all CLI customers within six months following the rate case final order (*i.e.*, May 21, 2025). 2024 Rate Case Settlement at 24, ¶70.

FirstEnergy PA also agreed in the 2024 Rate Case Settlement to make the following enhancements to its consumer education and outreach activities:

- Issue plain language notices to low-income customers with a past due bill during the winter heating season to inform them they have a past due bill and outline the available assistance to help pay their bill. 2024 Rate Case Settlement at 17, ¶60(c).
- Provide field representatives with a card in English and Spanish, beginning no later than March 1, 2025, that can be shared with customers to see if they qualify for additional protections at service locations. Ensure cards are in plain language and include a phone number consumers can call for direct translation and interpreter services. 2024 Rate Case Settlement at 24, ¶68.

On December 19, 2024, FirstEnergy PA filed a Petition to Amend its 2024 USECP (December 2024 Petition) at Docket Nos. M-2022-3036532, *et al.*, which proposes to, *inter alia*, update its PCAP participant and budget projections, including changes to maximum subsidy credit limits, based on the increase in base rates for each rate district effective January 1, 2025. On January 7, 2025, FirstEnergy PA filed clean and redlined versions of a proposed further revised 2024 USECP (Proposed Revised 2024 USECP) reflecting updated PCAP participant and budget projections, including changes to maximum subsidy credit limits, based on the increase in base rates for its rate districts effective January 1, 2025.

On January 27, 2025, OCA filed a Letter in Lieu of Answer at Docket Nos. M-2022-3036532, *et al.*, to indicate that it does not oppose the proposed changes to the Proposed Revised 2024 USECP. OCA Letter in Lieu of Answer at 2.

#### *Compliance of the Proposed Revised 2024 USECP with 2024 Base Rate Case*

The Commission's Bureau of Consumer Services (BCS) has reviewed FirstEnergy PA's Proposed Revised 2024 USECP to determine its compliance with universal service and consumer education and outreach changes approved in the 2024 Base Rate Case.

BCS has determined that the Proposed Revised 2024 USECP incorporates only one universal service provision from the 2024 Rate Case Settlement. Specifically, consistent with the 2024 Rate Case Settlement at ¶59(a), FirstEnergy PA has revised its 2024 USECP to reflect updated PCAP enrollment and budget projections and maximum PCAP subsidy credit limits for all rate districts. Proposed Revised 2024 USECP at 42-43.

The other changes to FirstEnergy PA's universal service programs and consumer education and outreach initiatives included in its approved 2024 Rate Case Settlement, as summarized above, are not reflected in its Proposed Revised 2024 USECP. Therefore, BCS has determined that FirstEnergy PA's Proposed Revised 2024 USECP is not consistent with the changes approved in its 2024 Base Rate Case.

#### *Conclusion*

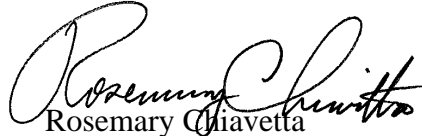
Accordingly, within 30 days, FirstEnergy PA is directed to file and serve a Further Revised 2024 USECP that incorporates all of the changes to its universal service program and consumer education and outreach initiatives approved in its 2024 Base Rate Case, as outlined above. FirstEnergy PA may submit its Further Revised 2024 USECP to BCS for an informal compliance review prior to filing.

The determinations in this Secretarial Letter have been made by BCS staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. These determinations relative to the requirement of a Further Revised 2024 USECP by BCS staff will be deemed to be the final action of the Commission unless reconsideration of the directives in this Secretarial Letter is sought from the Commission within 20 days after service of this

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

Questions may be directed to Jennifer Johnson in the Commission's Bureau of Consumer Services at [jennifjohn@pa.gov](mailto:jennifjohn@pa.gov).

Sincerely,

  
Rosemary Chiavetta  
Secretary

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