



September 29, 2025

Via Efiling

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: PECO Energy Company's 2019-2028 Universal Service and Energy Conservation Plan – Rate Case and LIHEAP Data Sharing
Docket No. M-2018-3005795**

Letter of the Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)

Dear Secretary Homsher:

On September 17, 2025, PECO Energy Company submitted an amended Universal Service and Energy Conservation Plan (USECP) to reflect guidance from the Commission regarding LIHEAP data sharing, changes related to recent base rate proceedings, and additional clarifications.¹ TURN and CAUSE-PA submit this letter objecting to PECO's Amended USECP and requesting the Commission direct PECO to further amend its USECP.² Specifically, PECO's Amended USECP explicitly requires a CAP application for LIHEAP recipients who have consented to data sharing, contrary to the Commission's directives.

As a part of its 2023 Review of Universal Service Programs, the Commission entered an Order on June 13, 2024, encouraging utilities to participate in data sharing with the Pennsylvania Department of Human Services' Low Income Home Energy Assistance Program (LIHEAP).³

¹ PECO Energy Company Universal Service and Energy Conservation Plan, 2019-2028, PUC Docket No. M-2018-3005795, Fifth Amendment (filed Sept. 17, 2025), <https://www.puc.pa.gov/pdocs/1895466.pdf> (hereinafter, Amended USECP).

² Since certain aspects of PECO's Amended USECP arise from final Commission orders in its most recent base rate proceedings, PECO's filing may be considered a belated compliance filing pursuant to 52 Pa. Code §5.592(a). To the same extent, this letter may be considered an exception pursuant to 52 Pa. Code §5.592(c).

³ 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, PUC Docket No. M-2023-3038944, Order (June 13, 2024), <https://www.puc.pa.gov/pdocs/1833698.pdf> (hereinafter June 2024 Order).

While the Commission did not require utilities to participate in data sharing, the Commission directed any utilities that opted to participate to, among other things, use a “simplified/streamlined process for households to enroll in universal service programs and recertify in CAP if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, **without requiring additional applications or documentation.**”⁴ The June 2024 Order also required the utilities to discuss plans for outreach and enrollment with its Universal Service Advisory Committees.⁵

In its July 31, 2024, letter responding to the June 2024 Order, PECO indicated its intent to participate in LIHEAP Data Sharing, and affirmed that it would use a simplified/streamlined process as identified in the Commission’s Order.⁶ However, as the Commission identified in its September 9, 2024 Secretarial Letter, while PECO’s letter made statements that were generally consistent with the June 2024 Order, the language in PECO’s proposed USECP attached to its July 2024 Letter was inconsistent as it still required a customer to complete a CAP application.⁷ The Commission stated:

First, the PECO Letter asserts that it will develop a simplified/streamlined process to enroll households into its universal service programs using the LIHEAP data received from DHS “without requiring additional applications or documentation.” PECO Letter at 1. This policy is consistent with the PUC’s recommendations in the June 2024 Order. However, PECO’s proposed revisions to the CAP enrollment process in its 2019 USECP would still require the customer to complete a CAP application, whether or not the customer’s household information is verified by DHS. PECO Letter, Exhibit A at 5. PECO is encouraged to eliminate the requirement for customers to complete a separate CAP application if the household’s information is already verified through the LIHEAP household data provided by DHS. Households whose information is shared by DHS should be permitted to enroll in CAP with informed consent, without completing an application or providing additional documentation after giving the public utility informed consent.⁸

In the Amended USECP, rather than eliminate the requirement on page 5 of its USECP that a customer complete a CAP application, PECO adds additional language on page 7 in its Amended USECP that emphasizes the requirement for a customer to complete a CAP application. PECO proposes to amend its USECP to state:

In order to place a customer in the CAP program, **a customer must complete a CAP application** and PECO must have information on the customer’s actual

⁴ *Id.* at 3 (emphasis added).

⁵ *Id.* Counsel for TURN and CAUSE-PA regularly attend PECO’s USAC. To our knowledge, while PECO has presented information about its data sharing plans, PECO has not to date meaningfully discussed its plans for data sharing with its USAC.

⁶ PECO Energy Company Universal Service and Energy Conservation Plan, 2019-2028, PUC Docket No. M-2018-3005795, Letter regarding Data Sharing (July 31, 2024), <https://www.puc.pa.gov/pdocs/1842310.pdf> (hereinafter July 2024 Letter).

⁷ PECO Energy Company Universal Service and Energy Conservation Plan, 2019-2028, PUC Docket No. M-2018-3005795, Secretarial Letter at 4 (Sept. 9, 2024), <https://www.puc.pa.gov/pdocs/1847857.pdf> (hereinafter September 2024 Secretarial Letter).

⁸ *Id.*

income, not merely a range of incomes, and the customer's household size. This information may be provided to PECO from DHS for LIHEAP Grant recipients who have granted permission to DHS to share income data with the utility.⁹

TURN and CAUSE-PA agree with the Commission's directive in its June 2024 Order, reiterated in its September 2024 Secretarial Letter, that households whose information is shared by DHS should be permitted to enroll in CAP without the need for an additional application. TURN and CAUSE-PA request that the Commission reject PECO's Amended USECP to the extent it requires LIHEAP recipients who have consented to data sharing to complete a CAP application prior to enrollment and direct PECO to further amend its USECP to remove any requirement for a CAP application for this subset of customers.

Respectfully submitted,

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⁹ Amended USECP at 7 (emphasis added).

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company's 2019-2028 Universal
Service and Energy Conservation Plan

M-2018-3005795

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Letter of the Tenant Union Representative Network and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceedings in accordance with the requirements of 52 Pa. Code § 1.54.

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