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October 31, 2025

**VIA ELECTRONIC FILING**

Mr. Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Duquesne Light Company – 2025 Universal Service Program Evaluation Report  
Docket No. M-2019-3008227**

Dear Secretary Homsher:

Consistent with Duquesne Light Company's ("Duquesne Light" or the "Company") Universal Service Program, at Docket No. M-2019-3008227, and 52 Pa Code Sec. 69.265, the Company files this 2025 Duquesne Light Company Universal Service Programs Final Evaluation Report. The report was completed by APPRISE, Inc.

Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael Brechlin", is written over a light blue horizontal line.

Michael Brechlin  
Assistant General Counsel, Regulatory

Enclosure

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**ELECTRONIC MAIL**

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Date: October 31, 2025



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**Duquesne Light  
Universal Service Programs  
Final Evaluation Report**

**September 2025**

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## Executive Summary

Duquesne Light implemented Universal Service Programs to improve affordability for low-income customers. The programs include the Customer Assistance Program (CAP), which provides reduced payments and arrearage forgiveness; Smart Comfort, which provides energy efficiency and energy education services; CARES, which provides outreach and referral services; and the Hardship Fund through Dollar Energy, which provides emergency assistance.

The goals of Duquesne Light's Universal Service Programs are as follows.

1. Provide and maintain affordable service for income-qualified customers.
2. Assist income-qualified customers to conserve energy and reduce their utility bills.
3. Operate in a cost-effective and efficient manner.

Electric distribution companies (EDCs) are required to have an independent third-party impact evaluation of their universal service and energy conservation programs and provide a report of the findings to the Pennsylvania Public Utilities Commission (Commission). This report provides the findings and recommendations from the evaluation of Duquesne Light's Universal Service Programs.

The following evaluation activities were conducted.

1. Evaluation Planning and Background Research
2. Duquesne Light Interviews
3. CBO Manager and Staff Interviews
4. Customer Survey
5. Program, Billing, Payment, and Collections Data Analysis

### **CAP Program**

Duquesne Light's Customer Assistance Program (CAP) provides bill payment assistance and arrearage forgiveness to customers with income at or below 150 percent of the Federal Poverty Level. Approximately 38,000 DLC customers participate in the program.

### **CAP Eligibility Criteria**

Customers with income at or below 150 percent of the poverty level who have demonstrated or expressed an inability to pay their electric bill are eligible for CAP. Customers are not required to demonstrate that they are payment-troubled by accumulating arrearages.

Senior customers with income between 150 and 200 percent of the poverty level were grandfathered in and permitted to remain on CAP as long as their income remains at or below 200 percent of the poverty level. However, this benefit is not offered to new enrollees.

### **Program Benefits**

CAP participants receive the following benefits.

- Reduced bills
- A consistent monthly payment

- Arrearage forgiveness
- Protection against loss of service
- Waived security deposits
- No late payment charges
- Information about reducing electric usage
- Program referrals

Duquesne Light's CAP was transitioned to a Percentage of Income Payment Program (PIPP) with the Commission's new approved energy burden targets in January 2021. Table ES-1 displays the PIPP percentages and minimum monthly payments for electric heating and electric non-heating customers.

**Table ES-1**  
**CAP Percentage of Income Payment Percentages**

Poverty Level	Electric Non-Heating	Electric Heating
0% - 50%	2%	6%
51% - 100%	4%	10%
101% - 150%	4%	10%
Minimum Payment	\$20	\$40

### **Arrearage Forgiveness**

Customers who have an outstanding balance when they enroll in CAP can receive arrearage forgiveness when they make their full monthly payment. Each month, 1/36 of the pre-program arrearages are forgiven if customers make full and on-time payments or catch up on their previously missed monthly payments.

DLC also provided a one-time transitional arrearage forgiveness for customers who participated in CAP prior to the PIPP transition and accumulated additional balances on CAP. These in-program arrearages are combined into one balance with the pre-program arrearages and forgiven over a 36-month period.

### **Control of CAP Credits**

Customers who report \$0 income are required to make the Minimum CAP Payment. The mandatory Minimum Payment is applied to ensure that CAP customers pay a portion of their energy costs and helps to control the costs that are borne by non-CAP residential service customers.

The other CAP mechanism that is used to control CAP costs and to encourage conservation is a maximum annual CAP discount amount. The CAP discount is the difference between the full bill for actual usage and the CAP bill. If the customer reaches the maximum annual discount before the 12-month anniversary of their enrollment month, the customer is required to pay the actual bill at the full tariff rate. Table ES-2 displays the maximum annual credits.

**Table ES-2**  
**CAP Maximum Annual Credits**

Poverty Level	Electric Non-Heating			Electric Heating		
	Through 1/14/2022	1/15/2022 – 12/19/2024	Effective 12/20/2024	Through 1/14/2022	1/15/2022 – 12/19/2024	Effective 12/20/2024
0% - 50%	\$1,600	\$1,700	\$2,100	\$2,350	\$2,500	\$2,700
51% - 100%	\$1,400	\$1,500	\$1,600	\$1,800	\$2,000	\$2,200
101% - 150%	\$900	\$1,000	\$1,100	\$1,300	\$1,400	\$1,500

### **CAP Enrollment**

Customers can enroll in CAP by visiting an agency office, over the phone, or through an online application. Required documentation can be submitted electronically, by mail, or by fax. Customers must participate in a call with agency staff to verify their information and review the program.

DLC is setting up to coordinate CAP enrollment with the Pennsylvania Department of Human Services (DHS). Additionally, DLC will participate when DHS adds a box to the LIHEAP application that allows customers to opt-in to CAP enrollment.

### **Recertification**

All CAP customers are required to recertify every other year, except for \$0 income customers who are required to recertify every six months. A letter is sent to the customer at least 15 days before the recertification deadline. Some customers do not respond to recertification requests. As a result, they are removed from CAP and billed at the full tariff rate. After they see the increased bill, they often contact the agency and complete their recertification.

### ***Hardship Fund Program***

DLC's hardship fund is a partnership with the Dollar Energy Fund (DEF). The Fund assists customers with unaffordable balances on their utility bills.

### **Eligibility Guidelines**

Customers are eligible for the hardship fund if they meet the following criteria.

- Household income at or below 200 percent of the Federal Poverty Level.
- DLC residential account.
- Paid at least \$150 toward their utility bill within 90 days or made three consecutive CAP payments. Senior citizens aged 62 and over must have paid at least \$100.
- Balance on the electric bill of at least \$100. Senior citizens may have a zero balance as long as there is no credit on the account.

There are additional criteria regarding service status depending on the time of year. Several changes were made to the usual program eligibility for calendar years 2022 and 2023 because a rate case settlement required that DLC add \$1 million to the budget for those two

years. The next season returned to the usual level, but the following three seasons were allocated an additional \$350,000.

### **Program Benefits**

Dollar Energy provides the following benefits.

- Financial assistance for overdue energy bills (electric heating or non-heating customers). The grant maximum is \$600.
- One grant can be received per calendar year.
- Protection against shutoffs.
- Restoration of electric service if terminated.
- Referrals to other programs and services.

Grant maximums were increased and households were permitted to receive two grants per year for calendar years 2022 and 2023 because of the additional funding.

### **Application**

While customers were previously required to visit a hardship fund enrollment agency to apply for a grant, they can now apply over the phone or email information to the agency. DEF has an online tool that DLC will begin using in October 2025.

### ***CARES Program***

Duquesne Light's Customer Assistance Referral and Evaluation Services (CARES) program helps payment-troubled and special needs customers to obtain additional assistance. Approximately 12,640 customers are served each year.

CARES targets customers with income below 150 percent of the poverty level and seniors with income below 200 percent of the poverty level. There are no income guidelines to qualify for CARES. The program aims to assist customers who are experiencing temporary hardships such as a loss of income from an illness, the loss of a primary wage earner, or other challenges that prevent them from paying their electric bills.

CBOs help customers to obtain all available assistance for which the household qualifies and make referrals to other program services. The case managers help customers with grant applications when needed. Home visits are scheduled for customers with special needs who are unable to visit the agency. If they enroll a customer in CAP, LIHEAP, or the Hardship Fund, they will check the customer's account to make sure that the enrollment was successful.

### ***Smart Comfort Program***

The Smart Comfort Program provides energy conservation services to residential customers. The program provides replacement of appliances and lighting and weatherization if warranted. DLC has a goal to serve 3,100 customers annually from 2020 to 2025. The goal was exceeded in 2023 and 2024.

**Smart Comfort Eligibility**

Customers must meet the following criteria to be eligible for the Smart Comfort Program.

1. Gross household income at or below 150 percent of the Federal Poverty Level.
2. Seniors or special needs customers with gross household income less than 200 percent of the Federal Poverty Level.
3. CAP customers who have reached at least 50 percent of their maximum CAP credit in less than five months.
4. Confirmed low-income heating customers who have usage that exceeds the system-wide average usage for residential heating customers.
5. Confirmed low-income non-heating customers who have usage that exceeds the system-wide average usage for residential non-heating customers.
6. Baseload electric usage of more than 500 kWh per month.
7. Resident at current address for at least six months.
8. Has not received a Smart Comfort visit in the last seven years.

Residency and baseload usage requirements are waived for all electric homeowners. Residency requirements are waived for non-heating CAP homeowners. Customers who do not meet all Smart Comfort eligibility requirements can be served by Watt Choices, DLC's Act 129 program which provides the same services and benefits as Smart Comfort.

**Smart Comfort Measures**

All jobs include an audit to investigate savings opportunities and determine measures for installation. The following measures are considered based on household-specific circumstances.

- Health and Safety Measures: This may include carbon monoxide detectors, smoke alarms, minor roof repairs, plumbing leaks, minor basement moisture mitigation, knob and tube mitigation, and electric panel upgrades.
- Standard Measures: LEDs, refrigerators and freezers, electric hot water tanks, window or central air conditioning units, air infiltration measures, smart strips, and insulation.
- Other Measures: Potential additional measures may include furnaces, heat pumps, electric ranges, and water pumps.
- Air Conditioning Load Reduction Measures: These currently include window and central air conditioner replacements. Window film and roof coating may be considered in the future.

### **Smart Comfort Savings**

DLC's recent Smart Comfort evaluation found average annual savings of 1,012 kWh or 8.5 percent of pre-treatment usage for baseload jobs and 993 kWh or 7.9 percent of pre-treatment usage for electric heating jobs. This is a very good result for baseload jobs. While electric heating job savings increased over the past three years, these savings are still somewhat lower than the baseload savings. The electric heating job savings are expected to be higher than the baseload savings, given more comprehensive measure installation.

DLC has implemented new Smart Comfort initiatives including an electrification pilot, de facto heating remediation, an emergency repair fund, and knob and tube remediation.

### **CAP Participant Feedback**

APPRISE conducted a mixed mode web and telephone survey with 231 current CAP participants. Key findings are summarized below.

#### **Participant Characteristics**

- **Vulnerable Households:** Most respondents (75 percent) reported that they had at least one young child, elderly or disabled member in the household.
- **Income Source:** Most respondents (82 percent) reported that they received non-cash benefits such as food stamps or public/subsidized housing, less than half (42 percent) received general or public assistance, about a third (34 percent) received retirement income and about one-fifth (21 percent) received wages or self-employment income.
- **Unemployment:** Twenty-seven percent of the respondents reported that someone in the household was unemployed and seeking work in the past 12 months.

#### **CAP Information Source and Reason for Participation**

- **Information Source:** The most common sources of information were word of mouth (20 percent) followed by Duquesne Light customer service representatives (19 percent) and Community Based Organizations or Social Service or Government Agencies (16 percent).
- **Reasons for CAP Enrollment:** Most respondents (57 percent) reported that they enrolled to reduce their energy bills. Other common reasons included financial issues (45 percent), even monthly payments (nine percent), and the need for assistance (seven percent).

#### **Program Understanding**

- **Customer Responsibilities:** Respondents were most likely to state that they needed to keep up with payments (74 percent). Other responsibilities reported included notifying DLC if their income changes (10 percent), recertifying or verifying income (nine percent), and conserving energy (four percent).

- **Program Benefits:** Most respondents reported reduced energy bills as a benefit of CAP (62 percent). Other benefits reported included even monthly payments (17 percent) and preventing service termination (14 percent).
- **Arrearage Forgiveness:** Seventeen percent of respondents reported that they needed to make the monthly CAP payment on time and 13 percent reported that they needed to make a full payment to receive arrearage forgiveness.

#### Program Experience

- **Monthly Payment Difficulty:** Most respondents (78 percent) found it somewhat or very difficult to make the payments before enrolling in CAP, but only 13 percent reported that it was very or somewhat difficult to make their payments after enrolling in CAP.
- **Change in Energy Bills:** The majority of respondents reported lower energy bills (53 percent) and no change in usage (52 percent) after enrolling in CAP.
- **CAP Importance:** Ninety percent of respondents said that CAP was very important in helping them to meet their needs, and seven percent said it was somewhat important.

#### Program Satisfaction and Recommendations

- **Satisfaction:** A majority of respondents (84 percent) reported being very satisfied with the program, and 13 percent report being somewhat satisfied.
- **Recommendations:** The most common recommendations provided by respondents were improved communication (12 percent), an easier application/renewal process (six percent), and a lower monthly bill (six percent)

### ***CAP Impact***

The evaluation analyzed the impact of CAP on affordability, bill payment compliance, and collections actions and disconnections. Key findings from the analysis are summarized below.

- **CAP Maximum Credit:** While 23 percent of New 2023 CAP Enrollees received the maximum credit, only three percent received the maximum credit and were then billed for their actual usage. Increased maximum credits went into effect in December 2024, which reduced the percentage of participants that reach the maximum credit.
- **CAP Credits:** The mean annual 2024 CAP credit was \$811 for non-electric heating participants and \$804 and for electric heating participants.
- **CAP Discount:** The average annual CAP discount across CAP participants was 44 percent. Customers below 50 percent of the poverty level received an average annual discount of 57 percent.
- **Energy Burden:** Non-electric heating CAP participants' mean energy burdens declined from 32 percent in the year prior to enrollment to 24 percent in the year following

enrollment. When excluding customers with \$0 income (whose energy burdens are set to 100 percent in the analysis) and minimum payment customers, the mean energy burden for CAP participants declined to five percent in the year following enrollment. For electric heating CAP participants, excluding those with \$0 incomes and minimum payments, the mean energy burden declined from 14 percent in the year prior to CAP enrollment to eight percent in the year following CAP enrollment.

- **Bill Payment:** CAP participants improved their bill payment after enrolling in the program. Non-electric heating customers had a net increase of 2.8 on-time payments in the year following CAP enrollment, and electric heating customers had a net increase of 3.8 on-time payments in the year following CAP enrollment.

The percentage of charges covered by CAP participants' payments and other credits increased from an average of 74 percent in the year prior to enrollment to 111 percent in the year following enrollment, a net increase of 38 percentage points for non-electric heating customers. Electric heating customers had a net increase in coverage rates of 42 percentage points.

- **Arrearage Forgiveness:** The analysis found that 97 percent of New 2023 CAP Enrollees received arrearage forgiveness in the year following CAP enrollment. The mean amount of arrearages forgiven for New 2023 CAP enrollees was \$280.
- **Collections Actions:** There was a 14 percentage point net reduction in the percentage of customers with one or more collections actions for New 2023 CAP Enrollees in the year following CAP enrollment compared to the Comparison Group.
- **Disconnections:** There was a 13 percentage point net reduction in the percentage of customers with one or more disconnections for New 2023 CAP Enrollees in the year following CAP enrollment compared to the Comparison Group.

### ***Findings and Recommendations***

The evaluation found that DLC's Universal Service Programs are performing well and providing significant benefits for their customers. Key findings and recommendations for program improvement are provided below.

- **Universal Service Program Approach:** DLC is committed to delivering Universal Service Programs in a more holistic manner to more effectively address the needs of their low-income customers. They expect to implement some changes in their next Universal Service Plan to move toward this goal. Some considerations for DLC that were brought to light in manager interviews include the following.
  - **Proactive Approach:** Work to address customer payment problems before they achieve a level of debt that is very difficult to recover from.
  - **Collaborative Action:** Break down the silos between assistance organizations that provide various program services.

- Simplification: Wherever possible, simplify programs to improve customer understanding of the various assistance options available to them.
- Administration: Implement more accessible, self-service options that allow customers to check information independently. For example, creating a portal where customers can check their program status, apply, or verify income.
- CAP Design: DLC has made many improvements to the program since the last evaluation including implementation of the Percentage of Income Payment approach with lower energy burden targets, an increased maximum CAP credit, and the ability for customers to apply online.  
*The CAP design is working well, and we do not make recommendations for changes to the current design.*
- CAP Application and Enrollment: DLC and CBOs reported challenges with CAP administration.
  - CAP Enrollment: There are opportunities for DLC to reduce the administrative burden of enrollment for customers and CBOS.  
*Recommendation: DLC should prioritize developing options to reduce the application burden for both customers and CBOs. This could include the following.*
    - *LIHEAP Data Sharing: DLC is setting up to coordinate CAP enrollment with the Pennsylvania Department of Human Services (DHS). Initially, CAP auto-enrollments will not be handled in DLC's system, but the CBOs will use that data and ask new CAP customers if they want to be enrolled. DLC estimates that these procedures will become fully system-automated in 2026 or 2027.*
    - *LIHEAP Application: DLC will also participate when the DHS adds a box to the LIHEAP application that allows customers to opt-in to CAP enrollment.*
    - *Text Communications: Other utilities are introducing increased use of texting to notify customers of specific information or documentation that is missing from their applications. The customer can respond by using a link provided, taking pictures on their phone, and directly sending those pictures. Because customers can currently opt out of text notifications, this may require additional steps such as having customers opt into text messaging when they apply for CAP.*
  - \$0 Income Customers: There are a substantial number of CAP customers who are on the minimum payment because they report \$0 income.  
*Recommendation: DLC should consider requiring additional information or a CBO interview prior to enrolling or recertifying \$0 income customers.*
  - CAP Understanding: DLC has found that customer understanding of CAP is lacking, and CBOs also reported some areas for improved education, such as the maximum bill credit and the recertification requirements.  
*Recommendation: DLC should implement their planned system to inform customers at enrollment about an upcoming educational call that will provide additional CAP education after customers are out of crisis.*

- Re-certification: Most CAP defaults occur because customers do not recertify. However, many of these customers are reinstated less than a month later. This indicates that re-certification is cumbersome and difficult to understand.  
*Recommendation: DLC should implement planned DHS coordination and senior auto-recertification as soon as possible to reduce the recertification burden and the number of customers who are removed from CAP and then returned to the program following a delayed recertification.*  
  
*Recommendation: DLC can also use texting to inform customers that they are due for recertification, and the customers can use a customer-specific link to take pictures of their documentation and send it to the CBO. Additional texts can be exchanged if information is missing from the recertification application.*
- Recertification Confirmation: CBOs report that the customer does not receive confirmation when their recertification is received. If the CAP amount changes, they are not aware of the change until they receive their next bill.  
*Recommendation: Text and/or email the customer with confirmation and the updated monthly payment amount.*
- CBO Administrative Burden: CBOs report that they are challenged by the CAP workload with budgets that have not kept up with increases in responsibilities and CAP participation levels.  
*Recommendation: DLC should develop methods to track CBO workload and timeliness of handling CAP applications and recertifications. The CBOs' workload should be reduced if DLC implements some of the enhanced application and recertification recommendations noted above. However, DLC should assess whether more CBO resources are needed to meet the increased CAP participation.*
- CAP Payment: Agencies report that the ten percent CAP payment for electric heating customers above 100 percent of the Federal Poverty Level is difficult for customers to pay.  
*Recommendation: The follow-up call that DLC is planning for CBOs to make 60 days after CAP enrollment should emphasize that CAP participants are eligible to apply for LIHEAP and aid with LIHEAP application and/or provide referral to CARES for assistance with the LIHEAP application.*
- CAP Participation and Impacts: The CAP participant survey and the impact analysis showed that CAP participants are highly satisfied with the program and that it results in improved customer affordability and payment compliance.
  - CAP Satisfaction: The survey found that 97 percent of CAP survey respondents felt that CAP was very or somewhat important in helping them to meet their needs and were very or somewhat satisfied with the program.

- CAP Impacts: The impact analysis found that CAP participants had significant improvements in their energy affordability, on-time bill payments, percent of bill paid, and reduced collections and disconnections.
- Payment Delinquency: Some CAP customers still do not pay their DLC bills. DLC reports that those who fall far behind on their payments and accrue high past due balances have a low chance of clearing their arrearages. They are working to capture customers that fall behind on payments before the balances get too high, especially in time for grant application season.  
*Recommendation: DLC should consider proactive outreach to customers who fall behind on their CAP payments.*
- Hardship Fund: Duquesne Light has worked successfully with the Dollar Energy Fund (DEF) to provide emergency grants to payment-troubled customers. Recent additional funding has allowed the program to remain open later in the year.
  - Agency Workload: The one challenge that DEF reported was that CBOs have had a reduction in staffing since COVID which has made program administration more difficult.  
*Recommendation: Similar to the CAP agencies, we recommend that DLC assess whether hardship fund agencies are compensated sufficiently to provide responsive services to program applicants.*
  - Grant Amounts: DEF reports that customers with electric service from DLC and gas heating from another utility can receive up to \$600 for each utility. However, DLC electric heating customers can only receive up to \$600 in total.  
*Recommendation: DLC should consider whether grant amounts should be higher for electric heating customers.*
  - Third Party Assistance: DEF reports that over 50 organizations make regular pledges to cover customer payments and the system is difficult to manage.  
*Recommendation: DLC should work with DEF to develop a system to efficiently manage these grants.*
- CARES: Duquesne Light's Customer Assistance Referral and Evaluation Services (CARES) program helps payment-troubled and special needs customers to obtain additional assistance. DEF reported that they provide holistic services to CARES customers and make extensive efforts to reach customers with home visits when needed and assist them with the challenges that they face. CARES provides another layer of assistance for vulnerable customers who are sometimes overwhelmed.  
*Recommendation: One recommendation for CARES is to reconsider how referrals are used to provide holistic services to low-income customers and to train Contact Center Representatives to make appropriate referrals.*

- Smart Comfort: Energy savings have improved over the past several years and the program has incorporated beneficial initiatives such as the heat pump and home repairs pilots. We have the following findings and recommendations for this program.
  - Holistic Approach: Duquesne Light is working to restructure Act 129, Smart Comfort, and other Universal Services Programs and Energy Efficiency programs to take a deeper community-centered approach. DLC wants to partner with organizations who can provide one-stop shopping for all needed services, such as gas, water, food, and mental illness.  
*Recommendation: We recommend that DLC partner with a prime contractor that has experience training and managing these smaller organizations to ensure that customers continue to receive comprehensive and high-quality energy efficiency services.*
  - LIURP Compensation: DLC reported that CLEAResult focuses more on their Smart Comfort work because the program provides an audit fee whereas Act 129 only pays for the measures installed.  
*Recommendation: A fixed fee for each job or hours spent at the home (with a minor markup on materials) that is the same for both programs may better incentivize contractors to serve customers with the most appropriate program and measures.*
  - Customer Targeting: DLC reports that a key challenge is the lack of electric heating and water heating jobs in the service territory, which makes it difficult to reach the ten percent goal for these jobs.  
*Recommendation: DLC should initiate a special referral process for the agencies when reviewing CAP applications from electrically-heated customers to ensure that these customers are targeted for LIURP services.*
  - Landlord Consent: Both DLC and CLEAResult stated that landlord consent was a major obstacle to completing comprehensive jobs.  
*Recommendation: DLC should consider providing landlord outreach and education to increase acceptance of the program.*
  - Coordination: Coordination with WAP was a challenge because the WAP agencies had extra funding through IRA programs.  
*Recommendation: Now that agency funding has declined, there will be greater opportunities for WAP coordination, and DLC should prioritize these efforts.*

There are also significant benefits to coordinating jobs with the gas utilities. DLC reported that this coordination has become more difficult as CLEAResult lost those gas LIURP contracts.

*Recommendation: DLC should consider the ability of contractors to perform the gas utility work as a factor in their LIURP vendor procurement, as this coordination is an important benefit for the program.*

- Refrigerators and Freezers: ENERGY STAR certified refrigerators are provided in exchange for old units when the customer's appliance is at least five years old, or between three and five years old and severely malfunctioning.  
*Recommendation: The program should consider metering the equipment to determine if replacement is warranted.*
- Heat Pumps: The heat pump pilot is achieving high savings.  
*Recommendation: DLC should continue and expand this pilot if possible. Additional research should assess the cost-effectiveness of this work and the impact on participants' energy bills.*
- Health & Safety: Act 129 jobs do not receive carbon monoxide and smoke detectors.  
*Recommendation: DLC should use LIURP funding to support carbon monoxide and smoke detectors in Act 129 jobs, as these measures are not funded by Act 129, but are important health and safety measures for all customers.*
- Education: Education is an important aspect of Smart Comfort.  
*Recommendation: DLC should enhance the educational aspect of the Smart Comfort program, with additional customer-facing materials on their website and make these materials available for distribution to customers at the audits.*
- Energy Savings: The 2023 LIURP impact analysis found that the electrically heated jobs had lower savings than the baseload jobs.  
*Recommendation: Additional research should be conducted to assess the reasons for the lower savings on these jobs and how performance can be improved.*
- Evaluation: Additional analysis of Smart Comfort could provide more insight and lead to higher program savings.  
*DLC should consider a more comprehensive evaluation of their Smart Comfort program, as the Universal Services Program Evaluation is structured to focus on CAP. This evaluation would assess energy savings over several years, measure installation rates, and provide a detailed benchmarking against other LIURP programs in PA and other low-income energy efficiency programs around the country.*

## I. Introduction

Duquesne Light implemented Universal Service Programs to improve affordability for low-income customers. The programs include the Customer Assistance Program (CAP), which provides reduced payments and arrearage forgiveness; Smart Comfort, which provides energy efficiency and energy education services; CARES, which provides outreach and referral services; and the Hardship Fund through Dollar Energy, which provides emergency assistance. This report presents the results from an evaluation of these programs.

### A. Evaluation

The goals of Duquesne Light's Universal Service Programs are as follows.

1. Provide and maintain affordable service for income-qualified customers.
2. Assist income-qualified customers to conserve energy and reduce their utility bills.
3. Operate in a cost-effective and efficient manner.

Electric distribution companies (EDCs) are required to have an independent third-party impact evaluation of their universal service and energy conservation programs and provide a report of the findings to the Pennsylvania Public Utilities Commission (Commission). This report provides the findings and recommendations from the impact evaluation of Duquesne Light's Universal Service Programs.

The following evaluation activities were conducted.

1. Evaluation Planning and Background Research
2. Duquesne Light Interviews
3. CBO Manager and Staff Interviews
4. Customer Survey
5. Program, Billing, Payment, and Collections Data Analysis

### B. Organization of the Report

Seven sections follow this introduction.

- 1) *Section II – CAP Program*: Provides a detailed description of the CAP Program.
- 2) *Section III – Hardship Fund Program*: Provides a detailed description of the Hardship Fund Program.
- 3) *Section IV – CARES Program*: Provides a detailed description of the CARES Program.
- 4) *Section V – Smart Comfort Program*: Provides a detailed description of the Smart Comfort Program.
- 5) *Section VI – CAP Participant Feedback*: Provides a summary of the findings from the mixed mode web and telephone survey with CAP participants.
- 6) *Section VII – CAP Impact Analysis*: Provides a description of the methodology and findings from the analysis of CAP impacts.

- 7) *Section VIII –Findings and Recommendations*: Provides a summary of the findings and recommendations from all of the evaluation activities.

APPRISE prepared this report under contract to Duquesne Light. Duquesne Light facilitated this research by furnishing information and data to APPRISE. Any errors or omissions in this report are the responsibility of APPRISE. Further, the statements, findings, conclusions, and recommendations are solely those of analysts from APPRISE and do not necessarily reflect the views of Duquesne Light.

## II. Customer Assistance Program

Duquesne Light's (DLC's) Customer Assistance Program (CAP) provides bill payment assistance and arrearage forgiveness to customers with income at or below 150 percent of the Federal Poverty Level. The program was initially introduced as a pilot in 1995 and has undergone changes since that time to simplify eligibility requirements, reduce payment requirements, control CAP credits, and increase coordination with LIHEAP.

This section describes DLC's CAP. The information in this section of the report was obtained from review of DLC's program documents and procedures manuals, discussion with DLC managers and staff, and in-depth interviews with managers and staff at the Holy Family Institute and Catholic Charities, the organizations that administer the program for DLC.

### A. Goals and Resources

The goal of DLC's CAP is to make electric service affordable for income-eligible customers while encouraging and supporting energy conservation.

DLC's CAP costs are recovered through a reconcilable surcharge. The budget shown in the table below was included in their 2020 – 2025 Universal Service and Energy Conservation Plan.

The table shows that in DLC's plan, the projected enrollment was 36,585 in 2020, increasing to 38,451 in 2025. These projections were based on past CAP participation and their needs assessment. However, since that plan was filed, projections were updated in DLC's annual reconciliation filings.

**Table II-1  
CAP Projected Enrollment and Budget  
2020-2025**

<b>Year</b>	<b>Projected Enrollment</b>	<b>Funding Level (\$Millions)</b>
2020	36,585	\$32.9
2021	36,951	\$33.6
2022	37,320	\$34.3
2023	37,694	\$34.7
2024	38,070	\$35.4
2025	38,451	\$36.1

### B. Operations

DLC has two dedicated staff members to administer the Universal Service Programs. CAP is administered for DLC by the Holy Family Institute (HFI) and by Catholic Charities. They oversee a network of seven CBO offices where customers can enroll in CAP.

The Holy Family Institute has been responsible for DLC's CAP since 1999 and has many staff members with extensive DLC program experience. Intake offices were selected to provide services in areas with high concentrations of confirmed low-income customers and proximity to transportation.

The CAP intake agencies have the following responsibilities.

- Take referrals from various sources.
- Enroll customers in CAP.
- Provide energy education, especially to customers with high usage.
- Evaluate medical issues that may result in an override of the maximum CAP credit.
- Process security deposit waivers.
- Serve as the primary CAP contact throughout the customer's CAP participation.
- Monitor customer accounts and refer participants to DLC's programs and other support programs.
- Recertify income eligibility.
- Assist customers in applying for LIHEAP and Dollar Energy grants.
- Handle financial pledges from numerous social service agencies, churches, and other organizations that provide grants to prevent utility shutoffs.
- Remove defaulted customers from CAP.
- Attend community events to provide information on DLC's Universal Service Programs.

The agencies also handle special requests, such as calling previous LIHEAP recipients who have shutoff notices to ask whether they would like to have a LIHEAP Crisis grant application submitted on their behalf.

DLC representatives train agency staff to use their Customer Information System (CIS). Agencies can enroll customers in real time through direct connection with DLC's system. DLC holds a quarterly staff meeting for CAP agency representatives, as well as bi-weekly meetings to discuss issues and procedural changes.

DLC reports that the CBOs are highly customer-oriented and actively engaged in the community, often participating in community events. Most of the agencies have a strong understanding of CAP program requirements and the intake process. They excel at communicating with customers and connecting them to appropriate resources.

The following are areas of improvement for the CBOs noted by DLC.

- **Structure and Accountability:** There is a need for more consistent processes and better follow-through. Establishing clearer expectations for closing cases when timely responses are not received could improve overall efficiency.
- **Compliance:** In some instances, CBOs must better adhere to program guidelines and provide more consistent information to customers.

- Transparency: DLC has limited visibility into the day-to-day operations of the CBOs. DLC does not have data on the number of calls received by the CBOs, so it is difficult for DLC to accurately evaluate the CBOs' workload.
- Data Management: Greater diligence is needed in data collection and documentation.

### **C. Eligibility and Benefits**

This section provides information on the CAP eligibility criteria and program benefits.

#### **Eligibility Criteria**

Customers with income at or below 150 percent of the poverty level who have demonstrated or expressed an inability to pay their electric bill are eligible for CAP. Customers are not required to demonstrate that they are payment-troubled by accumulating arrearages.

Senior customers with income between 150 and 200 percent of the poverty level were grandfathered in and permitted to remain on CAP as long as their income remains at or below 200 percent of the poverty level. However, this benefit is not offered to new enrollees.

#### **Program Benefits**

CAP participants receive the following benefits.

- Reduced bills
- A consistent monthly payment
- Arrearage forgiveness
- Protection against loss of service
- Waived security deposits
- No late payment charges
- Information about reducing electric usage
- Program referrals

Duquesne Light's CAP was transitioned to a Percentage of Income Payment Program (PIPP) with the Commission's new approved energy burden targets in January 2021. There are three ways that CAP participants can be billed.

- 1) a percentage of their monthly gross household income
- 2) the Average Monthly Bill; or
- 3) their Actual Usage if less than the PIPP and average monthly bill.

Table II-2 displays the PIPP percentages and minimum monthly payments for electric heating and electric non-heating customers.

**Table II-2  
CAP Percentage of Income Payment Percentages**

Poverty Level	Electric Non-Heating	Electric Heating
0% - 50%	2%	6%
51% - 100%	4%	10%
101% - 150%	4%	10%
Minimum Payment	\$20	\$40

The Average Monthly Bill method is used if the customer's 12-month average bill is less than the CAP bill determined by the PIPP amount shown in Table II-2. The payment is reviewed and updated every four months to assess whether the customer would have a lower bill on PIPP or on the Average Monthly Bill method. The Average Monthly Bill is not subject to reconciliation.

If the customer's Actual Usage for a month is less than what the CAP bill would be based on the PIPP or the Average Monthly Bill, then the customer's payment would be based on the Actual Usage for that month. If the bill based on Actual Usage is less than the Minimum Payment, then the customer is billed based on the Actual Usage.

Customers who report \$0 income are required to make the Minimum CAP Payment. The mandatory Minimum Payment is applied to ensure that CAP customers pay a portion of their energy costs and helps to control the costs that are borne by non-CAP residential service customers.

The other CAP mechanism that is used to control CAP costs and encourage conservation is a maximum annual CAP discount amount. The CAP discount is the difference between the full bill for actual usage and the CAP bill. If the customer reaches the maximum annual discount before the 12-month anniversary of their enrollment month, the customer is required to pay the actual bill at the full tariff rate. Table II-3 displays the maximum annual credits. The maximum annual credits were increased in December 2024 to ensure that 80 percent of CAP participants were not expected to meet the maximum CAP credit, and then additionally by a percentage equal to the annual average increase in residential rates.

**Table II-3  
CAP Maximum Annual Credits**

Poverty Level	Electric Non-Heating			Electric Heating		
	Through 1/14/2022	1/15/2022 – 12/19/2024	Effective 12/20/2024	Through 1/14/2022	1/15/2022 – 12/19/2024	Effective 12/20/2024
0% - 50%	\$1,600	\$1,700	\$2,100	\$2,350	\$2,500	\$2,700
51% - 100%	\$1,400	\$1,500	\$1,600	\$1,800	\$2,000	\$2,200
101% - 150%	\$900	\$1,000	\$1,100	\$1,300	\$1,400	\$1,500

The payment percentages or the maximum CAP credits may be adjusted for customers who have extenuating circumstances, including the following.

- Addition to the household.
- Serious illness or medical condition.
- Consumption increase that the customer cannot control (such as a health-related increase).
- Severe weather conditions.
- Structural damage to the home.

DLC includes a thermometer bar graph in the customer's bill that displays the amount of the discount used to date, the amount of the discount remaining, and the date when the discount will be reset. This annual limit is communicated to CAP participants in their CBO interviews and their CAP welcome letter. Additionally, DLC sends letters to customers when they reach 75 percent of their maximum CAP discount. The letter contains three options to help prevent customers from reaching their limit.

- Manage and reduce usage.
- Reach out to request a Smart Comfort visit.
- Reach out to a CAP office if there is a reason for an exception.

Some customers have an exception that is noted on their account when they enroll in CAP because of their use of medical equipment or another issue.

Some customers who call DLC to request an exception do not understand the situations that qualify a customer for an exemption. Exceptions are provided when there is a real need for additional usage such as a medical condition, or when the circumstances are out of the customer's control, such as the use of space heaters because the landlord will not repair the primary heating system. DLC reports that 300 to 400 customers receive exceptions from the CAP maximum credit limit each year.

### **Arrearage Forgiveness**

Customers who have an outstanding balance when they enroll in CAP can receive arrearage forgiveness when they make their full monthly payment. The forgiveness of pre-program arrearages is provided over a 36-month period (DLC transitioned from a 24-month forgiveness period to a 36-month forgiveness period on January 1, 2023.) Each month, 1/36 of the pre-program arrearages are forgiven if customers make full and on-time payments or catch up on their previously missed monthly payments.

DLC also provided a one-time transitional arrearage forgiveness for customers who participated in CAP prior to the PIPP transition and accumulated additional balances on CAP. These in-program arrearages are combined into one balance with the pre-program arrearages to be forgiven.

**Payment Application**

Payments in excess of the monthly CAP amount due are first applied to any missed monthly CAP payments, and then to the next month's bill. LIHEAP payments are also applied in this manner.

**Customer Requirements**

Customers may remain on CAP as long as they are income eligible and they comply with the CAP guidelines. The customer obligations are as follows.

- Pay bills on time and in full every month.
- Schedule a Smart Comfort visit within 90 days of CAP enrollment (in certain situations).
  - All electric heating customers.
  - Electric non-heating homeowners with baseload usage of more than 500 kWh per month.
  - Electric non-heating renters who have resided in their homes more than six months with baseload usage of more than 500 kWh per month.
  - Electric non-heating customers with baseload usage over 500 kWh per month who have not had a Smart Comfort visit within the last seven years may be required to have a Smart Comfort visit.
- Customers with no income at the time of CAP enrollment must complete the “Zero Income Form” and provide Duquesne Light with permission to verify the income with government agencies. Income status may be reviewed periodically to determine if there are any changes.
- Notify the CAP Case Manager at the CBO or DLC if there are any changes to household income, residence, or number of household members.

Customers who do not make their CAP payments will enter the normal collections process. They are only removed from CAP if their DLC service is terminated and not restored within 30 days. Once their service is restored, they are reinstated on CAP.

***D. Outreach***

DLC implements extensive outreach to make customers aware of CAP and other assistance programs. Outreach efforts include the following approaches.

- Bill Messages and Inserts
- Targeted Emails
- DLC Website Postings
- Service Line Publications
- Social Media
- Customer Care Center Referrals
- Community-Based Partner Training and Outreach
- Press Releases
- Presentations at Governmental and Community Organizations
- Sponsorship and Participation in Senior and Community Events

**E. Enrollment Procedures**

Customers can enroll in CAP by visiting an agency office, over the phone, or through an online application. Required documentation can be submitted electronically, by mail, or by fax. Customers must participate in a call with agency staff to verify their information and review the program.

All customers applying for CAP can participate in a follow-up interview with a Community Based Organization (CBO) agent. During this interview, the agent explains CAP, CARES, and other available programs, and ensures that the customer understands CAP requirements.

Customers who report \$0 at CAP enrollment must complete a “Zero Income Form” and authorize DLC to verify income with government agencies. The form asks the customer to identify all household members and explain how the household expenses are met. These customers must re-certify their income every six months.

DLC sends a CAP mailing to customers who receive a LIHEAP grant who are not enrolled in CAP. The mailing explains the CAP benefits and requirements, and the application process. If the customer does not respond, the CBO conducts an additional outreach attempt by phone, mail, or email.

DLC is setting up to coordinate CAP enrollment with the Pennsylvania Department of Human Services (DHS). Initially, CAP auto-enrollments and auto-recertifications will not be handled in DLC’s system, but the CBOs will use that data. CBOs will let customers know they are recertified and ask new CAP customers if they want to be enrolled. DLC estimates that these procedures will become fully system-automated in 2026 or 2027.

Additionally, DLC will participate when DHS adds a box to the LIHEAP application that allows customers to opt-in to CAP enrollment.

**F. Referrals for Other Services**

The CBOs make many referrals to CAP participants, depending on the customer’s needs and the county where they reside. Referrals are also included in the CAP welcome packet. The referrals include the following programs and services.

- Gas and Water Utility Programs
- Hardship Fund
- LIHEAP
- 211 United Way Referrals
- Food banks
- SNAP
- Job Training and Job Placement
- Housing Programs
- Medical Assistance
- Area on Aging
- Meals on Wheels

- Pregnancy and Parenting Program
- Diaper Distribution
- Homeowners Assistance Fund (leftover COVID funds)
- Budget and Credit Counseling
- Legal Services
- Mental Health Services
- Women's Shelter

If needed, the caseworker will help the customer with the LIHEAP application, however, that is usually handled through the CARES program. Sometimes customers send LIHEAP applications to the CAP agency by mistake, and if it is a complete application, the agency mails it for the customer.

### **G. Recertification**

All CAP customers are required to recertify every other year, except for \$0 income customers who are required to recertify every six months. A letter is sent to the customer at least 15 days before the recertification deadline. Some customers do not respond to recertification requests. As a result, they are removed from CAP and billed at the full tariff rate. After they see the increased bill, they often contact the agency and complete their recertification.

### **H. CAP Statistics**

Table II-4 displays end-of-year CAP enrollment and total CAP costs for 2021 through 2025. Approximately 38,000 customers participate in the program. Costs increased from \$36.8 million in 2021 to \$43.1 million in 2024.

**Table II-4  
CAP Enrollment and Costs  
2021-2024**

<b>Year</b>	<b>Enrollment</b>	<b>Costs (\$Millions)</b>
2021	35,229	\$36,802,184
2022	38,092	\$41,188,950
2023	37,566	\$43,580,503
2024	38,766	\$43,140,698

Table II-5 displays the itemized CAP costs from 2021 through 2024. The table shows that the cost of the CAP credits increased from \$27.2 million in 2021 to \$37.5 million in 2024. However, the arrearage forgiveness costs declined in 2023.

**Table II-5  
CAP Itemized Costs  
2021-2024**

<b>Year</b>	<b>Administration</b>	<b>CAP Credits</b>	<b>Arrearage Forgiveness</b>	<b>Total Cost</b>
2021	\$1,837,474	\$27,227,252	\$7,737,458	\$36,802,184
2022	\$1,831,519	\$32,099,612	\$7,257,819	\$41,188,950
2023	\$1,712,419	\$36,539,118	\$5,328,966	\$43,580,503
2024	\$1,768,115	\$37,515,843	\$3,856,740	\$43,140,698

Table II-6 displays LIHEAP enrollment and benefits. The table shows that LIHEAP enrollment has increased since 2021.

**Table II-6  
LIHEAP Enrollment and Benefits  
2021-2024**

<b>Year</b>	<b>LIHEAP Cash Enrollment</b>	<b>LIHEAP Crisis Enrollment</b>	<b>Total LIHEAP Benefits</b>
2021	5,628	1,873	\$3,079,935
2022	9,238	4,541	\$7,318,616
2023	10,245	4,316	\$6,777,787
2024	9,381	3,020	\$5,017,329

Additional information on the characteristics of the CAP participants is reported in the CAP Impacts section of this report.

### ***I. Program Coordination***

DLC's system automatically marks customers with over 500 kWh average monthly usage over a 12-month period. When these customers enroll in CAP or are reinstated, a case is created for the LIURP contractor to conduct outreach on three separate occasions to schedule a Smart Comfort visit. If customers are not comfortable with an in-person visit, the vendor offers virtual visits. Customers are removed from CAP if they fail to respond to the vendor's contact attempts, but are reinstated once they complete the visit. Customers are infrequently removed from CAP for this reason.

### ***J. Program Changes***

Duquesne made several changes in their 2020-2025 Universal Service Plan.

1. Change from a Percent of Budget program to a PIPP.
2. Increase the minimum payment for non-electric heating customers from \$15 to \$20.
3. Require \$0 income customers to recertify every six months.

4. Provide an opportunity for customers to have existing in-program arrearages forgiven when they transitioned to the new PIPP.
5. Develop and implement a revised and simplified bill design.
6. Allow customers to submit an online CAP application.

Moving forward, DLC is working towards a more holistic and targeted approach to addressing customer needs.

- Customers who face a temporary hardship, such as job loss, would benefit from the Hardship Fund or LIHEAP to remove the balance that they built up. However, if they are back at work, they will not need CAP.
- Customers on long-term disability where their income never changes would be good candidates for CAP.
- Customers who are paying for their actual usage don't need CAP, especially if they don't have an arrearage.
- LIHEAP grant recipients who are not in CAP, may have received CAP calling outreach for over four years and have still not enrolled in CAP. These types of customers who do not wish to participate should no longer be targeted with CAP outreach.

## **K. Challenges**

DLC has faced some challenges in CAP implementation.

- DLC has found that customer understanding of CAP is lacking. Most customers join CAP in response to an immediate stressor, such as collections notices or unaffordable bills, so they focus on resolving the salient issue at the time of enrollment and don't look into the other benefits.

The team is working to implement a system where CBOs will follow up with customers to explain the full benefits offered by the program. This would tentatively involve at least one phone and one email attempt about 60 days from enrollment or reinstatement. This should further improve customer understanding of CAP, because at this time they should be out of crisis and better able to focus on the details of the program.

- **Re-certification:** Most CAP defaults occur because customers do not recertify. However, many of these customers are reinstated less than a month later. This indicates that re-certification is cumbersome and difficult to understand. This is especially the case for the senior population. DLC hopes that data sharing with DHS will help reduce this issue. Additionally, DLC is considering an auto-recertification process where seniors are only asked to confirm that there had been no change in their circumstances.
- **Payment Delinquency:** CAP customers who fall far behind on their payments and accrue high past due balances have a low chance of paying off their arrearages. DLC is working to assist customers who fall behind on payments before the balances get too high, especially in time for grant application season. If the customer waits until summer, little assistance is available to help them.

- **\$0 Income Customers:** There are a substantial number of CAP customers who are on the minimum payment because they report \$0 income. Customers don't always understand what should be reported as income, especially if they are self-employed, such as working for Uber. Additionally, customers are uncomfortable reporting informally earned income.
- **Maximum CAP Credits:** DLC just increased the maximum CAP credits because of rate increases and rising energy costs. There were too many customers reaching the limit, but this problem has been addressed with the recent increase.

The agencies reported the following challenges with CAP.

- **Workload:** The budget for agency services has not kept up with large increases in program workload. The workload has increased because of the required phone calls related to online applications, an increase in participation due to the increased ease of application, and a larger number of customers who must recertify every two years. The agency needs DLC to approve the hire of additional staff members.
- **Customer Billing Questions:** The agencies receive a large number of calls from customers with billing questions, including late payments, changes in payment amounts, and retaining CAP when they move. The 211 center frequently provides the agency phone number to those requesting help.
- **Online Applications:** The system allows customers to submit incomplete applications and this requires the agencies to spend a lot of time following up with customers. The agency makes a few attempts to contact the customer to complete the application and then closes the application if there is no response. If the customer responds later, the agency needs updated income information within 30 days of the application.
- **Customer Understanding:** Despite several explanations, customers do not understand that they will be charged their full usage amount after they reach the CAP credit limit.
- **Recertification:** The customer does not receive confirmation when their recertification is received. The CAP amount could change and the customer would not know until they got the next bill.
- **CAP Payment:** The ten percent CAP payment is difficult for customers to pay.

## **L. Successes**

The agencies reported several program successes.

- **Agency Services:** Many customers come to the agency offices to request help and resources. Customers sometimes come in with a pile of bills and the agency staff help them to sort out the priorities.

- **System Access:** DLC provides system access to agency workers so they can assess the customer's situation and provide the most appropriate type of assistance.
- **Accessibility:** The agency has many Spanish speaking staff, as well as staff members speaking other languages.
- **Automated Letters:** DLC has automated over income and enrollment letters, which has reduced this type of manual work.
- **CAP Maximum Credit Letters:** The letters that DLC sends to inform customers that they have reached 75 percent of the maximum credit have increased understanding of the CAP credit limit.
- **CAP Benefits:** The agencies report that the program is working well, it is a big help for customers, and it is reaching a large number of customers. They report that customers feel empowered when they have obtained an affordable bill.
- **Arrearage Forgiveness:** Agency staff report that the arrearage forgiveness is a big incentive to pay the CAP amount and maintain electric service.

### III. Hardship Fund Program

Duquesne Light's hardship fund is a partnership with the Dollar Energy Fund (DEF). The Fund assists customers with unaffordable balances on their utility bills.

#### A. Goals and Resources

The objectives of the Hardship Fund are as follows.

- Provide financial assistance to low-income families who have difficulty paying their energy bills.
- Provide financial assistance to low-income households who may not be eligible for LIHEAP.
- Coordinate with CBOs that provide energy-related assistance.
- Help customers understand and access community resources that are available to solve energy bill payment problems.

The Hardship Fund is funded by Duquesne Light and by customer contributions. Each year Duquesne Light matches all customer donations up to \$375,000. Duquesne Light also funds DEF up to \$100,000 annually to administer the program.

Customers can contribute to the program by pledging monthly to their electric bill payments, sending in a check, or contributing online.

Table III-1 displays the projected participation and budget for the hardship fund from 2020 through 2025. Duquesne Light estimates that they are able to serve 1,880 customers each year, except for 2022 and 2023 when they projected the ability to serve 3,500 customers annually because of higher DLC contributions in those years.

**Table III-1  
Hardship Fund Projected Enrollment and Budget  
2020-2025**

Year	Projected Enrollment	Funding Level
2020	1,880	\$750,000
2021	1,880	\$750,000
2022	3,500	\$1,750,000
2023	3,500	\$1,750,000
2024	1,880	\$750,000
2025	1,880	\$1,100,000

#### B. Operations

The Dollar Energy Fund (DEF) administers Duquesne Light's Hardship Fund. The DEF has a network of agencies and they provide software that allows agency staff to enter applications for their clients. DEF receives the information electronically, processes the

grants, and audits the agency paperwork through that system. They have the following responsibilities.

- Train CBOs.
- Review applications and supporting documentation.
- Process applications.
- Process payments to DLC.
- Develop payment reports.
- Audit CBOs.

DLC reports that DEF's data handling is strong, and they have a good understanding of the program that is needed to manually approve or deny applications. Additionally, the agency staff are very communicative, and the coordinators and grant team are especially helpful.

### **C. Eligibility and Benefits**

This section describes the eligibility guidelines and benefits that are provided through the program.

#### **Eligibility Guidelines**

Customers are eligible for the hardship fund if they meet the following criteria.

- Household income at or below 200 percent of the Federal Poverty Level.
- Duquesne Light residential account.
- Paid at least \$150 toward their utility bill within 90 days or made three consecutive CAP payments. Senior citizens aged 62 and over must have paid at least \$100.
- Balance on the electric bill of at least \$100. Senior citizens may have a zero balance as long as there is no credit on the account.

There are additional criteria regarding service status depending on the time of year.

- October 1 to November 30: Electric service off or in threat of termination.
- December 1 to January 31: Electric service off only.
- February 1 to February 28: Electric service off or in threat of termination.
- March 1 until Ten Percent Budget Remaining: Open to all eligible regardless of service status.
- Budget Has Ten Percent Remaining: Open to applicants whose service has been terminated.
- On July 1 each year, unused Hardship Funds are made available to all eligible customers.

The following changes were made to eligibility for calendar years 2022 and 2023 because a rate case settlement required that \$1 million was added to the budget for those two years. The next season returned to the usual level, but the following two seasons were allocated an additional \$350,000.

- Income eligibility was 300 percent of the Federal Poverty Level. (With 75 percent of Hardship Funds for households with income at or below 200 percent of the Federal Poverty Level.)

- Customers are only required to have paid a minimum of \$50 toward their utility bill within the last 90 days or made one CAP payment within the last 90 days.
- December 1 to January 31: Electric service off or in threat of termination.

The program is not open year-round because there is not enough funding available.

**Program Benefits**

Dollar Energy provides the following benefits.

- Financial assistance for overdue energy bills (electric heating or non-heating customers). The grant maximum is \$600.
- One grant can be received per calendar year.
- Protection against shutoffs.
- Restoration of electric service if terminated.
- Referrals to other programs and services.

The following changes were made to benefits for calendar years 2022 and 2023 because of the additional funding.

- The grant maximum is up to \$1,000 per year for non-electric heating customers.
- The grant maximum is up to \$2,000 per year for electric heating customers.
- The household can receive two grants per calendar year.

**D. Application Procedures**

While customers were previously required to visit a hardship fund enrollment agency to apply for a grant, they can now apply over the phone or email information to the agency. DLC is working on an online application.

**E. Statistics**

Table III-2 displays the Dollar Energy Fund enrollment and costs for 2021 through 2024. Approximately 1,636 grants were made in 2023-2024 total \$746,346.

**Table III-2  
Hardship Fund Enrollment and Benefits  
2021-2024**

<b>Year</b>	<b>Number of Customers who Received Grants</b>	<b>Average Grant</b>	<b>Total Benefits</b>
2021-2022	4,528	\$505	\$2,285,617
2022-2023	3,776	\$489	\$1,846,907
2023-2024	1,636	\$334	\$746,346

Table III-3 displays statistics on hardship fund contributions. DLC received \$236,759 in voluntary contributions and had a total of \$736,759 in funding in 2023-2024.

**Table III-3  
Hardship Fund Contributions  
2021-2024**

<b>Year</b>	<b>Voluntary Contributions</b>	<b>Public Utility &amp; Shareholder Contributions</b>	<b>Total Contributions</b>
2021-2022	\$227,750	\$1,375,000	\$1,602,750
2022-2023	\$234,017	\$1,375,000	\$1,609,017
2023-2024	\$236,759	\$500,000	\$736,759

### **F. Challenges**

DLC and DEF reported that the hardship fund program was working well. The one challenge that DEF reported was that CBOs have had a reduction in staffing since COVID which has made program administration more difficult.

### **G. Successes**

Duquesne Light has worked successfully to provide emergency grants to payment-troubled customers. Recent additional funding has allowed the program to remain open later in the year. They reported the following accomplishments.

- DLC has streamlined the process of providing information about the customer's account status, and LIHEAP and Crisis grants to DEF.
- DLC's system reviews applications automatically for program qualifying criteria.
- DEF has an online tool that DLC will begin using in October. The online application will improve accessibility to the program. While customers can apply via phone and mail, income verification using that process can be too slow when there is a threat of termination.
- DLC adapted to their increased funding by expanding eligibility and benefits. This was beneficial for the customers.

## IV. CARES Program

Duquesne Light's Customer Assistance Referral and Evaluation Services (CARES) program helps payment-troubled and special needs customers to obtain additional assistance.

### A. Goals and Resources

The objectives of CARES are as follows.

- Help customers with hardships to manage their electric bills by providing information, resources, and encouragement.
- Make tailored referrals to company and community assistance programs.
- Maintain or establish partnerships and alliances with social service agencies, government offices, and community offices to ensure assistance for customers.

The projected enrollment and funding level for CARES from 2020 through 2025 is shown in the table below.

**Table IV-1  
CARES Projected Enrollment and Funding  
2020-2025**

Year	Projected Enrollment	Budget
2020	12,640	\$145,000
2021	12,640	\$145,000
2022	12,640	\$145,000
2023	12,640	\$145,000
2024	12,640	\$145,000
2025	12,640	\$145,000

### B. Operations

The three Duquesne Light Universal Service dedicated staff members are responsible for overseeing CARES. CARES is administered by the Holy Family Institute and Catholic Charities. They have the following responsibilities.

- Review CARES referrals and applications.
- Forward information to CARES representatives.
- Make CARES notations in DLC's system.
- Calls customers to determine if a home visit is needed.

CBOs refer customers to CARES at the time of the CAP intake interview. The CBOs analyze customers' circumstances and refer them to appropriate programs and services. They also follow up with customers to determine the outcome of the referrals.

Customers can also be referred to CARES by Duquesne Light, other utilities, community based organizations providing other services, or the Public Utility commission.

Case managers also visit identified low-income, multi-family dwellings and other places to hold events that encourage and assist with CAP enrollment.

### **C. Eligibility and Benefits**

CARES targets customers with income below 150 percent of the poverty level and seniors with income below 200 percent of the poverty level. There are no income guidelines to qualify for CARES. The program aims to assist customers who are experiencing temporary hardship such as a loss of income from an illness, the loss of a primary wage earner, or other challenges that prevent them from paying their electric bills.

CBOs help customers to obtain all available assistance for which the household qualifies and make referrals to other program services. The case managers help customers with grant applications when needed. Home visits are scheduled for customers with special needs who are unable to visit the agency. If they enroll a customer in CAP, LIHEAP, or the Hardship Fund, the CBO will check the customer's account to make sure that the enrollment was successful.

CARES caseworkers work to help customers with whatever type of assistance is needed. Customers often call or visit for assistance with the CAP recertification. Some customers just need someone to talk to. One caseworker reported that he has shoveled sidewalks, taken out the garbage, and reached out to an electrician to install wiring. If they feel the customer is not safe, they will ask the Area Agency on Aging to conduct a wellness check.

The case is closed after the phone call or home visit. If the customer needs a qualifying payment for a Hardship Fund grant, they stay on CARES until that occurs and then move forward with a lower monthly payment. The customer has the CARES representative's phone number, and they call the agencies and do not have to contact Duquesne Light with issues.

### **D. Program Referrals**

Referrals made by CARES representatives include the following.

- 211 United Way Helpline
- CAP
- LIHEAP
- Hardship Fund
- Area Agency on Aging
- Meals on Wheels
- Veteran's Programs

### **E. Statistics**

Table IV-2 displays program costs and customer benefits from the CARES program from 2021 through 2024. CARES benefits include all LIHEAP cash and crisis grants, plus non-LIHEAP direct dollars. The table shows that benefits have increased over this time period.

**Table IV-2**  
**CARES Enrollment and Costs**  
**2021-2024**

<b>Year</b>	<b>Costs</b>	<b>Benefits</b>
2021	\$135,000	\$101,752
2022	\$135,833	\$270,407
2023	\$145,000	\$328,008
2024	\$145,000	\$275,279

### **F. Challenges**

DLC reported that one challenge with the program is training Contact Center Representatives on when to refer customers to CARES. They found that at times there were over referrals to the program and that more training for the representatives could be helpful. The representatives need to ask customers.

- Do you use medical equipment?
- Do you have a computer and can you enroll by e-mail?
- Can you see or read documents if mailed to you?

Another challenge is ensuring that CARES reaches the difficult to serve customers.

### **G. Successes**

DEF reported that they provide holistic services to CARES customers and make extensive efforts to reach customers with home visits when needed and assist them with the challenges that they face. CARES provides another layer of assistance for vulnerable customers who are sometimes overwhelmed.

## V. Smart Comfort Program

The Smart Comfort Program provides energy conservation services to residential customers. The program provides replacement of appliances and lighting and weatherization if warranted.

### A. Goals and Resources

The objectives of Smart Comfort are as follows.

- Reduce the energy usage and electric bills of low-income customers.
- Increase the ability to pay for low-income customers.
- Provide safer living conditions for low-income customers by reducing the use of secondary heating equipment.
- Educate the customers on current conservation practices.
- Make tailored referrals to DLC and other assistance programs.

DLC has a goal to serve 3,100 customers annually from 2020 to 2025. The budget is based upon an average cost of \$4,425 for electric heating jobs and \$425 for baseload jobs, and an additional average cost of \$289 per job for incidental repairs. Table V-1 displays the Smart Comfort projected enrollment and funding level for 2020 through 2025.

**Table V-1  
Smart Comfort Projected Enrollment and Funding**

Year	Projected Enrollment	Total Funding
2020	3,100	\$3,053,500
2021	3,100	\$3,053,500
2022	3,100	\$3,453,500
2023	3,100	\$3,453,500
2024	3,100	\$3,453,500
2025	3,100	\$3,753,500

Smart Comfort has met its customer recruitment goals over the past three years. Most customers agree to participate in Smart Comfort because it's a requirement for them to remain in CAP.

### B. Program Management and Administration

The Smart Comfort Program is staffed by a Manager of Universal Services and two analysts. The Act 129 staff also support the program and assist with coordination of jobs with the gas utilities.

LIURP is administered by CLEAResult. They have the following responsibilities.

- Intake and scheduling.
- Service delivery implementation.
- Managing multiple subcontractors.

- Managing the Emergency Repair Program in coordination with DLC.
- Resolving customer issues and inquiries.
- Tracking and reporting.
- Invoicing DLC.
- Removing CAP benefits for customers who do not complete the audit.

### **C. Eligibility**

Customers must meet the following criteria to be eligible for the Smart Comfort Program.

1. Gross household income at or below 150 percent of the Federal Poverty Level.
2. Seniors with gross household income less than 200 percent of the Federal Poverty Level. (No more than 50 percent of participants can be between 150 and 200 percent of the Federal Poverty Level, and no more than 20 percent of the budget can be spent on these customers.)
3. Special needs customers with gross household income less than 200 percent of the Federal Poverty Level.
4. CAP customers who have reached at least 50 percent of their maximum CAP credit in less than five months.
5. Confirmed low-income heating customers who have usage that exceeds the system-wide average usage for residential non-heating customers.
6. Confirmed low-income non-heating customers who have usage that exceeds the system-wide average usage for residential heating customers.
7. Baseload electric usage of more than 500 kWh per month.
8. Resident at current address for at least six months.
9. Has not received a Smart Comfort visit in the last seven years.

Residency and baseload usage requirements are waived for all electric homeowners. Residency requirements are waived for non-heating CAP homeowners. Customers who do not meet all of the Smart Comfort eligibility requirements can be served by Watt Choices, DLC's Act 129 program which provides the same services and benefits as Smart Comfort.

### **D. Program Outreach**

DLC conducts the following outreach to promote Smart Comfort.

- Participating in community events.
- Providing program information on their website.
- Distributing brochures and pamphlets to CBOs who engage with low-income customers.
- Including information in their residential monthly newsletter.
- CAP managers automatically refer CAP enrollees with high usage to Smart Comfort.

- A Smart Comfort visit may be offered to customers that file a high bill complaint to the PUC.

Additionally, the DLC team implements a holistic marketing strategy that integrates Smart Comfort with other Universal Service Programs, and other income-eligible initiatives under a unified branding approach.

DLC's Smart Comfort vendor creates their own marketing materials, which they distribute at one to two events each year. But the vendor primarily relies on DLC's efforts and Smart Comfort education provided by CAP agencies.

### **E. Targeting and Customer Outreach**

DLC prioritizes the following customers for LIURP services.

- All electric, low-income, multi-family premises.
- Electric heating customers (with a goal of at least ten percent of LIURP jobs).
- Customers with annual CAP credits of over \$1,000.
- High-usage CAP customers.
- Eligible customers who request weatherization.

DLC provides the LIURP contractor with two reports to facilitate targeting high-usage customers.

- CAP Max List: Includes all CAP customers who are at or above 50 percent of the CAP maximum credit within the first five months of the CAP program year. This list is sent monthly.
- New CAP Enrollees: Customers who have recently enrolled in CAP and have an average monthly usage over 500 kWh. This list is sent to the contractor each week.

CLEAResult makes two phone calls and sends a postcard when conducting Smart Comfort intake. When attempting to schedule the customer for the audit, they will make up to three phone calls and send a postcard.

### **F. Service Delivery**

Service delivery follows the steps listed below.

1. Assess the customer's previous 12 months of energy usage, and assess baseload, winter, and summer kWh usage. The purpose of this analysis is to guide the auditor through the audit process and determine areas to focus on in the energy education.
2. Audit the home to investigate saving opportunities and measure usage of targeted electrical equipment. This may include refrigerators, freezers, dehumidifiers, window air conditioners, electric water heaters, electric baseboard heaters, and thermostats.
3. Provide energy education on the Smart Comfort program, the electric bill, ways to reduce electric usage, and CAP.
4. Determine measures to be installed.

- Health and Safety Testing: This testing will be completed on all homes that qualify for air sealing measures.
- Blower Door Testing: This testing will be conducted if it is determined to be beneficial in determining which measures should be installed.
- Standard Measures: Installation may include LEDs, refrigerators and freezers, electric hot water tanks, window or central air conditioning units, air infiltration measures, smart strips, and insulation.

ENERGY STAR certified refrigerators are provided in exchange for old units when the customer's appliance is at least five years old, or between three and five years old and severely malfunctioning. If the customer is a renter, the landlord must approve the replacement.

The program also replaces freezers that are at least seven years old, dehumidifiers, and air conditioning units that are at least seven to ten years old during summer months.

- Other Measures: Potential additional measures may include furnaces, heat pumps, electric ranges, and water pumps.
- Air Conditioning Load Reduction Measures: These currently include window and central air conditioner replacements. Window film and roof coating may be considered in the future.
- Health & Safety Measures: LIURP contractors can spend up to \$200 per electric baseload Smart Comfort visit and \$1,000 per electric heating Smart Comfort visit on incidental repairs including health and safety items to allow for conservation measures to be installed. This may include carbon monoxide detectors, smoke alarms, minor roof repairs, plumbing leaks, minor basement moisture mitigation, knob and tube mitigation, and electric panel upgrades.

Additional health and safety spending up to \$2,000 may be approved with priority for CAP customers who have reached at least 50 percent of their maximum CAP credit threshold.

CLEAResult reports that they are able to remediate most health & safety issues since DLC is very willing to allocate funds to keep jobs moving forward. While some problems like roof leaks and electrical issues do occur, overall health and safety concerns remain minimal. In cases where larger issues arise and DLC funds are insufficient, customers are given up to 180 days to make the necessary repairs.

5. Customer monitoring and follow up, which may include contacting customers to discuss usage and reinforce energy education.

The Duquesne Light team requires contractors to show their average job costs every month, to ensure baseload measure costs are low and comprehensive measure costs are higher. They are installing more heat pumps now to achieve higher savings.

### **G. Energy Education**

CLEAResult auditors and installation staff educate customers about behavioral changes they can make to reduce their energy usage. They also provide DLC's Smart Comfort booklet, which includes low-cost and no-cost energy-saving strategies, as well as an electrical safety booklet. Field staff also refer to this booklet to provide energy-saving tips and support customer behavioral changes.

CLEAResult reports that they encourage their staff to go beyond direct installs by reviewing household usage trends, appliance profiles, and customer feedback to personalize their energy-saving tips. The goal is to pair direct installations with actionable advice, empowering customers to manage their own behavior-driven savings.

### **H. Program Coordination**

Smart Comfort is coordinated with Watt Choices and with the gas LIURP programs. Confirmed low-income customers who participate in any Duquesne Light programs are referred to Watt Choices, Universal Service programs, and LIHEAP. Where possible, a contractor will perform an integrated electric and natural gas audit and DLC will share costs with the natural gas utility.

DLC is also starting to build partnerships with WAP agencies, but this has been more difficult than working with the gas companies. When WAP had a lot of funding, they did not have the time to partner with DLC. Now that their funding has declined, they are more willing to partner and DLC is building the relationships.

### **I. Quality Control**

DLC has contracted with a third-party quality control inspector to review five percent of baseload jobs and ten percent of heating jobs. If a job receives a poor quality control inspection report or a customer calls with a complaint, DLC follows up with the implementer to ensure the issue is addressed. DLC also contacts the customer afterward to confirm the problem was resolved.

Most jobs pass the quality control inspection, but there are occasional missed opportunities. There has only been one failed job that required an emergency follow-up. In most cases, failed jobs involve issues like weatherstrips falling off doors or a major missed opportunity, which the contractor will go back to fix. DLC has improved its process for identifying and handling follow-ups, ensuring timely resolution when issues are found.

Occasionally, there is miscommunication between the crew members and the inspector, but this doesn't automatically result in a job failure unless the issue is significant. In such cases, the inspector will add a note to the quality control report.

**J. Program Statistics**

Table V-2 displays Smart Comfort Enrollment and costs for 2021 through 2024. The table shows that 2,967 electric baseload and 189 electric heating customers were served in 2024 at a cost of \$3,734,244.

**Table V-2  
Smart Comfort Enrollment and Costs  
2020-2023**

Year	Enrollment		Total Costs
	Electric Baseload	Electric Heat	
2021	2,233	351	\$2,267,480
2022	1,942	179	\$2,630,871
2023	2,881	725	\$3,961,140
2024	2,967	189	\$3,734,244

DLC’s recent Smart Comfort evaluation found average annual savings of 1,012 kWh or 8.5 percent of pre-treatment usage for baseload jobs and 993 kWh or 7.9 percent of pre-treatment usage for electric heating jobs. This is a very good result for baseload jobs. While electric heating job savings increased over the past three years, these savings are still somewhat lower than the baseload savings. The electric heating job savings are expected to be higher than the baseload savings, given more comprehensive measure installation.

**Table V-3  
2023 Smart Comfort Usage and Savings**

	Treatment Group – Elec Baseload				Comparison Group – Elec Baseload				Net Change	
	Pre-Use	Post-Use	Annual Savings		Pre-Use	Post-Use	Annual Savings		Annual Savings	
			kWh	%			kWh	%	kWh	%
# Customers	2,423				1,529					
Raw	10,698	10,077	621	5.8%	10,542	11,214	-672	-6.4%	1,293	12.1%
Day Adjusted	11,128	10,474	654	5.9%	11,165	11,230	-65	-0.6%	719	6.5%
Degree Day Normalized	12,450	11,271	1,179	9.5%	12,402	12,223	179	1.5%	1,000	8.0%
PRISM Normalized	11,938	10,841	1,096	9.2%	11,811	11,727	84	0.7%	1,012	8.5%

	Treatment Group – Elec Heat				Comparison Group – Elec Heat				Net Change	
	Pre-Use	Post-Use	Annual Savings		Pre-Use	Post-Use	Annual Savings		Annual Savings	
			kWh	%			kWh	%	kWh	%
# Customers	614				290					
Raw	10,913	9,747	1,166	10.7%	12,975	13,399	-423	-3.3%	1,589	14.6%
Day Adjusted	11,443	10,474	968	8.5%	13,819	13,418	401	2.9%	567	5.0%
Degree Day Normalized	12,423	11,702	720	5.8%	14,822	15,016	-194	-1.3%	914	7.4%
PRISM Normalized	12,558	11,796	763	6.1%	14,854	15,084	-230	-1.5%	993	7.9%

## K. New Initiatives

As outlined in the Universal Service Plan, DLC has implemented new LIURP initiatives.

- **Electrification Pilot:** DLC introduced a pilot to electrify customers with delivered fuels and upgrade inefficient electric systems to heat pumps. Natural gas heating systems can be replaced with gas company permission if the customer lost gas service due to a gas line leak and they are using electric space heating.

Initially, identifying customers was challenging because those using delivered fuels mainly lived in rural areas, making them difficult to reach. There was also a lot of skepticism about a program providing a free heat pump. However, once DLC established a presence in these areas and gathered customer testimonials, it helped build trust and made it easier to connect with potential participants.

The pilot began in summer 2023 and 40 systems have been completed. Because the cost of the upgrades is on the higher end, DLC needs to be selective about which homes are included. The program targets homes with high electric usage during the winter months, where the installation of a heat pump is expected to result in significant savings. Panel upgrades are funded through DLC's Emergency Repair Program or through Rebuilding Together Pittsburgh. They have estimated average annual savings of about 6,000 kWh per home.

- **De Facto Heating Remediation:** DLC provides heating remediation services to eligible customers who use inefficient electric supplemental heating. They identify these customers based on winter electric usage patterns and prioritize CAP participants. Customers will receive these services if they are a non-electric heating customer and they have over 1,000 kWh of heating usage in a winter month or if they use electric space heaters. These customers will receive heating remediation services and education. When applicable, DLC may also engage with the natural gas company to coordinate service delivery.
- **Emergency Repair Fund:** This fund is for eligible customers who own their homes and are in immediate need of safety repairs. DLC or the contractor may refer customers to this initiative when they observe unsafe conditions, and customers can also apply directly. DLC prioritizes CAP participants but serves other qualifying customers if funds

are available. These services may include whole house air conditioner repair or replacement, repair of unsafe line drops, electrical panel upgrades, and remediation of other health and safety conditions. The most common repairs have been related to central air conditioning, which requires a doctor's note to confirm that it is medically necessary. Additionally, there are a lot of repairs to unsafe wiring conditions, like frayed or loose wires.

- Knob and Tube Remediation: DLC has allocated funding to remediate Knob and Tube wiring for homeowners to allow for coordination with the gas LIURP programs and to achieve additional electric savings through air conditioning upgrades. Only a few jobs have been completed each year, so this funding has been spent on other jobs and may be reallocated to the Emergency Repair Fund.

## **L. Program Changes**

Since the last Universal Service Evaluation, DLC has brought on a new vendor to conduct third party quality control and has implemented the new initiatives described above.

DLC has been working with the Clean Energy Technology Center that recently opened a new center in their service territory. With their training, DLC hopes to be able to involve small community organizations and to encourage small women, veteran, disabled, and minority companies to provide program services. In the future, DLC would like to partner with organizations who can provide one-stop shopping for all needed services, such as natural gas, water, food, and mental illness. They would like to work with a partner who can holistically address customer issues so they can earn a living wage and are potentially able to exit CAP. They envision a journey to family self-sufficiency, but the programs will still be there for the elderly, disabled, and other customers who continue to need assistance.

## **M. Challenges**

DLC reported the following challenges with Smart Comfort.

- Electric Heating Jobs: DLC is challenged to reach the ten percent goal for these jobs because electric heating is uncommon in their service territory.
- Rising Delivery Costs: Maintaining service delivery quality amid rising costs and a finite budget of about \$3.5 million is a challenge. DLC works to use the budget prudently to ensure program goals are met.
- Contractor Quality: DLC faces challenges with the service delivery contractor. They work with the contractor to provide high-quality service delivery while addressing the following issues.
  - Fragmented Approach: The contractors have one team that confirms eligibility and provides initial program information, and another team that handles scheduling. This approach can lead to a 15 to 25-day gap between the first customer contact and the scheduling attempt, which makes it challenging to reach customers, and customers could be lost. This means that more customers need to be brought into the pipeline.

- Data Tracking and Billing Errors: Frequent errors require significant DLC time for review and revision requests.
- Inquiries: Repetitive questions and approval requests for DLC on issues where the contractor is expected to assess the situation and make determinations.
- Measure Assessment: The contractor is expected to do a better job in assessing the most effective measures to be installed.
- Standardized Approach: DLC would like the organization to better respond to individualized customer challenges.
- Delays: The contractor struggles to meet the 60-day job completion timeline that DLC has set.
- Compensation Mechanisms: DLC does not compensate the contractor with a mark-up on the cost of LEDs. However, other EDCs provide an LED cost mark-up to their contractors, which inflates their average costs of baseload measures. Due to this, DLC faced some criticism in their last rate case due to their lower baseload measure costs as compared to other EDCs.
- Landlord Approval: Most incomplete jobs are because the landlord did not consent to having the work done.
- CBO Referrals: Duquesne Light would like to see more CBO referrals to Smart Comfort, much like Holy Family Institutes and Catholic Charities do for CAP. The new community-centered approach to Act 129 and Smart Comfort should increase referrals.
- Customer Education: Smart Comfort should implement a more comprehensive educational component that helps customers understand how their behavior affects energy consumption. Education could guide customers on ways to reduce usage without necessarily needing the Smart Comfort visit. The DLC website offers this information, but it is difficult to navigate. Making the website more user-friendly and intuitive could potentially help customers better access this information and learn what changes they can make on their own.

CLEARresult reported the following challenges.

- Oversaturation of LED Lighting: The widespread adoption of LED lighting reduces the potential for savings from that measure.
- Landlord Approval Requirements: Securing landlord approval for comprehensive audits remains a significant barrier. If they cannot obtain landlord approval, CLEARresult will do a baseload audit and then will go back to do a comprehensive audit if the approval is obtained.

**N. Successes**

DLC has undertaken several activities to improve the Smart Comfort Program.

- **Data Management:** DLC overhauled their data system in 2022 to tie it directly to the PUC's LIURP codebook, greatly improving data accuracy.
- **Quality Control:** DLC has brought on an organization to conduct third-party quality control.
- **Heat Pumps:** DLC's heat pump initiative has created high savings for program participants and has great potential for increased application.
- **Health and Safety:** Contractors are able to remediate health and safety issues required to complete comprehensive services in most of the jobs. The additional Emergency Repair Fund has increased their ability to remediate issues found in the homes.

## VI. CAP Participant Feedback

APPRISE conducted a mixed mode web and telephone survey with current participants in Duquesne Light's Customer Assistance Program. This section provides information on the research methodology and the findings from the survey.

### A. Methodology

The CAP survey was conducted to develop information on customers' experiences in the program. A sample of 500 customers who received at least one CAP credit between July 2024 and December 2024 were selected for the survey and 231 customers completed the survey.

The survey was conducted via a mixed-mode web/telephone approach in May and June 2025. Outreach to the sample was conducted in the following manner, summarized in Table VI-1.

- **Advance Letter:** Customers were sent an advance letter on May 29, 2025 that included a \$5 bill, explained the purpose of the survey, provided a link to complete the web survey, notified them that they would be called to complete the survey, and provided the option to call a toll-free number to complete the survey at their convenience.
- **Email #1:** Customers were sent an email with the same information as the advance letter on May 30, 2025.
- **Outbound Calling:** Outbound calls were made to all selected customers who had not responded online beginning on June 5, 2025. Calls were made during the day, evening, and weekends.
- **Emails:** Customers were sent four more emails between June 6, 2025 and June 27, 2025.

The survey was closed on June 30, 2025.

**Table VI-1  
Survey Outreach**

<b>Contact Method</b>	<b>Date</b>
First Advance Letter	05/29/2025
First Advance Email	05/30/2025
Survey Calling Implementation	06/05/2025
Second Email	06/06/2025
Third Email	06/13/2025
Fourth Email	06/20/2025
Final Email	06/27/2025
Survey Calling Terminated	06/29/2025
Survey Closed	06/30/2025

Surveys were completed with 231 CAP participants, 46 percent of the selected sample. The response rate for the total sample was 55 percent, and 90 percent of customers who were reached by telephone completed the survey (cooperation rate). Overall, 43 percent of the surveys were completed online, and 57 percent were completed by phone. Table VI-2 furnishes information on the final disposition for the entire sample.

**Table VI-2  
Final Sample Disposition**

Final Disposition	CAP Participants	
	#	%
<b>Total</b>	<b>500</b>	<b>100%</b>
Voicemail/No Answer	188	38%
Non-Working Number/Wrong Number	38	8%
Refused	25	5%
Ineligible	11	2%
Too Ill to Participate/Language Barrier	5	1%
Requested Callback/Partial Complete	2	<1%
<b>Complete</b>	<b>231</b>	<b>46%</b>
<b>Survey Method</b>		
Phone	132	57%
Online	99	43%
Cooperation Rate	-	90%
Response Rate	-	55%

### **B. Participant Characteristics**

This section provides information on the CAP participant characteristics based on the survey response.

Table VI-3 displays home ownership rates. About 63 percent of respondents indicated that they own their homes and 35 percent indicated that they rent.

**Table VI-3  
Home Ownership**

Do you own or rent your home?		
Home Ownership	CAP Participants	
	#	%
Own	145	63%
Rent	81	35%

Do you own or rent your home?		
Home Ownership	CAP Participants	
	#	%
Don't Know	0	0%
Refused	5	2%
<b>Total</b>	<b>231</b>	<b>100%</b>

Table VI-4 displays the number of household members, children, and elderly living in respondents' households. Over half of the respondents reported living alone, and about a quarter reported that there were three to four household members. While 11 percent reported that there were one or more children in the home, 46 percent reported that there was an elderly household member.

**Table VI-4**  
**Number of People, Children, and Elderly People Living in Household**

Including you, how many people normally live in this household? How many people in this household are 5 years of age or under? Including you, how many people in this household are 62 years of age or older?						
# in Household	Household Members		Children		Elderly	
	#	%	#	%	#	%
0 People	-	-	194	84%	113	49%
1 Person	121	52%	17	7%	95	41%
2 People	32	14%	4	2%	10	4%
3-4 People	56	24%	5	2%	2	1%
More than 4 People	15	6%	0	0%	0	0%
Don't Know	0	0%	1	<1%	0	0%
Refused	7	3%	10	4%	11	5%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

Table VI-5 displays information on the presence of vulnerable members within respondents' households. A significant portion of respondents reported having elderly members (46 percent) and disabled members (48 percent) in their household. About 11 percent of respondents reported that there were children in their household. The table also shows that 75 percent of respondents had at least one member of these vulnerable groups in the home.

**Table VI-5**  
**Vulnerable Members in Household**

Vulnerable Members	CAP Participants	
	#	%
Children	26	11%

Vulnerable Members	CAP Participants	
	#	%
Children	26	11%
Elderly Member	107	46%
Disabled	112	48%
Any Vulnerable Member	173	75%

Note: Figures correspond to the number of respondents who indicated any vulnerable member in their household.

Table VI-6 displays the education level reported by the household. The most common responses were a high school diploma or equivalent (41 percent) and some college or an associate’s degree (32 percent). A smaller portion of households reported having a member with a bachelor’s degree (10 percent) or vocational training (four percent).

**Table VI-6  
Education Level**

What is the highest level of education reached by any member of your household?		
Education Level	CAP Participants	
	#	%
Less than High School	14	6%
High School Diploma or Equivalent	95	41%
Some College/Associate’s Degree	75	32%
Bachelor’s Degree	23	10%
Master’s Degree or Higher	5	2%
Vocational Training	10	4%
Don’t Know	0	0%
Refused	9	4%
<b>Total</b>	<b>231</b>	<b>100%</b>

Table VI-7 displays the type of income and benefits reported to be received by the household. Most respondents (82 percent) reported that they received non-cash benefits such as food stamps or public/subsidized housing, less than half (42 percent) received general or public assistance, about a third (34 percent) received retirement income and about one-fifth (21 percent) received wages or self-employment income.

**Table VI-7  
Types of Income and Benefits Received**

<b>In the past 12 months, did you or any member of your household receive:</b>		
	<ul style="list-style-type: none"> <li>• Employment income from wages and salaries or self-employment income from a business or farm?</li> <li>• Retirement income from Social Security or pensions and other retirement funds?</li> <li>• Benefits from TANF, SSI, or general assistance or public assistance?</li> <li>• Food Stamps or live in public/subsidized housing?</li> </ul>	
<b>Income and Benefits</b>	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Wages or Self-Employment Income	48	21%
Retirement Income	78	34%
Public Assistance	97	42%
Non-Cash Benefits	189	82%
<b>Total</b>	<b>231</b>	<b>100%</b>

Respondents were asked whether a household member was unemployed in the past 12 months. Table VI-8 shows that 27 percent of the respondents reported that someone in the household was unemployed and seeking work during that time.

**Table VI-8  
Household Unemployment**

<b>In the past 12 months, were you or any member of your household unemployed and looking for work?</b>		
	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Yes	63	27%
No	155	67%
Don't Know	3	1%
Refused	10	4%
<b>Total</b>	<b>231</b>	<b>100%</b>

### **C. Reasons for CAP Participation and Enrollment**

This section assesses CAP information sources and reasons for enrollment in CAP.

Respondents were asked how they learned about CAP. Table VI-9 shows that the most common sources of information for CAP were word of mouth (20 percent), followed by Duquesne Light customer service representatives (19 percent) and Community Based Organizations or Social Service or Government Agencies (16 percent).

**Table VI-9  
CAP Information Source**

<b>How did you learn about CAP?</b>		
<b>Information Source</b>	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Word Of Mouth	47	20%
Duquesne Light Customer Service Representative	43	19%
Community Based Organization/Social Service Agency/ Government Agency	36	16%
Duquesne Light Bill Insert/Brochure	15	6%
General DLC Outreach/Information	14	6%
Duquesne Light Website	12	5%
Media (Newspaper, TV)/ Online Research	8	3%
Community Event	3	1%
Columbia Gas	1	<1%
Don't Know	54	23%
Refused	10	4%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

Respondents were asked why they enrolled in CAP. Table VI-10 shows that most respondents (57 percent) reported that they enrolled to reduce their energy bills. Other common reasons included financial issues (45 percent), even monthly payments (nine percent), and the need for assistance (seven percent).

**Table VI-10  
Reasons for CAP Enrollment**

<b>Why did you decide to enroll in CAP?</b>		
<b>Reason for Enrolling</b>	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Reduce Energy Bills	132	57%
Financial Issues	104	45%
Even Monthly Payments	21	9%
Needed Assistance	17	7%
Reduce Amount of Money Owed to Duquesne Light/Reduce Arrearages	5	2%
Prevent Service from Being Shut Off	5	2%
Don't Know	5	2%
Refused	6	3%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

Respondents were asked about the assistance they received from agencies in their CAP applications. Table VI-11 shows that 43 percent reported that they received help from an agency. While 35 percent said the agency helped them understand the program's benefits and requirements, 22 percent said the agency provided a referral to other programs for additional support.

**Table VI-11**  
**Received Help from Agency for CAP Application**

<b>Did you receive help from an agency when applying for CAP?</b>						
<b>Did the agency help you to understand the benefits and requirements of the program?</b>						
<b>Did the agency refer you to any other programs that could help you with your energy bills or other needs?</b>						
	<b>Agency Provided Help</b>		<b>Agency Improved CAP Understanding</b>		<b>Agency Provided Program Referral</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Yes	100	43%	81	35%	50	22%
No	113	49%	8	3%	37	16%
Don't Know	18	8%	11	5%	12	5%
Refused	0	0%	0	0%	1	<1%
Did Not Receive Help <sup>1</sup>	-	-	131	57%	131	57%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

<sup>1</sup>Only respondents who indicated receiving help from an agency when applying for CAP were the follow-up questions.

Respondents were asked which agency helped them apply for CAP. Table VI-12 shows that 16 percent reported that they received help from the Holy Family Institute and six percent said they received help from Catholic Charities. Other respondents reported assistance from other community agencies and TANF or social service agencies.

**Table VI-12**  
**Agency for CAP Application**

<b>Which agency helped you?</b>		
<b>Agency</b>	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Holy Family Institute	38	16%
Catholic Charities	13	6%
Other Community Agencies	12	5%
TANF/Social Service Agencies	7	3%
Don't Know	18	8%
Refused	12	5%

Which agency helped you?		
Agency	CAP Participants	
	#	%
Did not Receive Agency Assistance <sup>1</sup>	131	57%
<b>Total</b>	<b>231</b>	<b>100%</b>

<sup>1</sup>Only respondents who indicated receiving help from an agency when applying for CAP were asked this question.

Respondents were asked about the ease or difficulty they faced when enrolling in and re-certifying for CAP. Table VI-13 shows that 53 percent said enrollment was very easy, and 35 percent said it was somewhat easy. Only 10 percent found enrollment somewhat or very difficult. Re-certification was also generally viewed as easy.

**Table VI-13**  
**Enrollment and Re-certification Difficulty**

How easy or difficult was it to enroll in the CAP Program? How easy or difficult was it to re-certify for CAP?				
Difficulty	CAP Participants			
	Enrollment		Re-Certification <sup>1</sup>	
	#	%	#	%
Very Easy	123	53%	99	54%
Somewhat Easy	81	35%	69	38%
Somewhat Difficult	21	9%	8	4%
Very Difficult	3	1%	6	3%
Don't Know	3	1%	2	1%
Refused	0	0%	0	0%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>184</b>	<b>100%</b>

<sup>1</sup>Only respondents who indicated recertifying for CAP were asked about the ease of recertification.

Those respondents who reported some difficulty with enrollment or recertification were asked what aspects of the process were difficult. Table VI-14 shows that the most common issues were accessing support (four percent for enrollment and three percent for re-certification) and completing the application (four percent for enrollment and two percent for re-certification). A few respondents also cited difficulty providing proof of income and making an appointment with a CAP agency.

One respondent, who is disabled, reported repeated issues with DLC losing his recertification paperwork in recent years, resulting in shutoff notices. He reported that his case worker also expressed frustration over poor communication and the frequent loss of submitted documents.

**Table VI-14  
Difficult Parts of Application**

What parts of enrollment in the CAP Program were most difficult? What parts of re-certification in CAP were most difficult?				
Difficult Parts of Application	CAP Participants			
	Enrollment		Re-certification	
	#	%	#	%
Accessing Support	10	4%	7	3%
Completing the Application	10	4%	5	2%
Providing Proof of Income	5	2%	3	1%
Making Appointment at CAP Agency	1	<1%	1	<1%
Other	1	<1%	1	<1%
Don't Know	1	<1%	2	1%
Refused	1	<1%	0	0%
Not Difficult <sup>1</sup>	207	90%	217	94%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

<sup>1</sup>Only respondents who indicated difficulty in enrolling and re-certifying for CAP were asked these questions respectively.

#### **D. Program Understanding**

This section reports on respondents' understanding of CAP.

Respondents were asked about their understanding of their responsibility in CAP. Table VI-15 shows that respondents were most likely to state that they needed to keep up with payments (74 percent). Other responsibilities reported included notifying DLC if their income changes (10 percent), recertifying or verifying income (nine percent), and conserving energy (four percent).

**Table VI-15  
Understanding of Participant Responsibility**

What is your understanding of your responsibility in this program?		
Understanding of Participant Responsibility	CAP Participants	
	#	%
Keep Up with Payments	172	74%
Notify Duquesne Light if Income Changes	22	10%
Recertify/Verify Income	20	9%
Conserve Energy	9	4%
Accept Weatherization/LIURP Services	2	1%
Apply for LIHEAP	2	1%

What is your understanding of your responsibility in this program?		
Understanding of Participant Responsibility	CAP Participants	
	#	%
Keep Up with Payments	172	74%
Don't Know	25	11%
Refused	18	8%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

When asked what they needed to do if their income changed while they were enrolled in CAP, 75 percent of respondents said they would notify DLC, while 13 percent said they would provide new proof of income.

**Table VI-16**  
**Actions for Income Changes**

What do you need to do if your income changes while you are enrolled in the program?		
Actions for Income Changes	CAP Participants	
	#	%
Notify Duquesne Light	173	75%
Provide New Proof of Income	30	13%
Reapply for the Program	3	1%
Nothing	4	2%
Don't Know	33	14%
Refused	4	2%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

Table VI-17 displays the benefits respondents associated with CAP. Most respondents reported reduced energy bills as a benefit of CAP (62 percent). Other benefits reported included even monthly payments (17 percent) and preventing service termination (14 percent).

A participant explained that while he was hospitalized, CAP kept his electric bill at \$25 a month, which allowed him to focus on his recovery without worrying about utility costs.

**Table VI-17  
CAP Benefits**

What do you feel are the benefits of the program?		
CAP Benefits	CAP Participants	
	#	%
Reduce Energy Bills	143	62%
Even Monthly Payments	39	17%
Prevent Service from Being Shut Off	32	14%
General Assistance for Low-Income/ Fixed Income Households	17	7%
Reduce Amount of Money Owed to Duquesne Light/Reduce Arrearages	12	5%
Increases Ability to Meet Other Needs	5	2%
Reduces Stress	5	2%
Information on Usage	4	2%
Don't Know	12	5%
Refused	17	7%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

Respondents were asked what they needed to do to have their past due balances forgiven. Table VI-18 shows that 17 percent reported they needed to make the monthly CAP payment on time and 13 percent reported that they needed to make a full payment.

**Table VI-18  
Actions for Arrearage Forgiveness**

What do you need to do to have Duquesne Light forgive past due balances or arrearages?		
Actions for Arrearage Forgiveness	CAP Participants	
	#	%
Pay Monthly CAP Payment on Time	40	17%
Pay Monthly CAP Payment in Full	30	13%
Notify Duquesne Light/CAP Agency	15	6%
Set Up a Payment Plan with Duquesne Light	6	3%
Do Not Have Arrearages	26	11%
Don't Know	122	53%
Refused	24	10%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

Respondents were asked whether the forgiveness of past due balances makes them more likely to pay their current DLC bill. Table VI-19 shows that 65 percent of respondents said that forgiveness makes them more likely to pay their bill.

**Table VI-19**  
**Impact of Arrearage Forgiveness**

<b>Does this forgiveness of money owed for past due balances or for past bills that were not paid make you more likely to pay your current Duquesne Light bill?</b>		
	<b>CAP Participants</b>	
	<b>#</b>	<b>%</b>
Yes	151	65%
No	27	12%
Don't Know	50	22%
Refused	3	1%
<b>Total</b>	<b>231</b>	<b>100%</b>

### **E. Program Experience**

This section reports on respondents' experience on CAP.

Respondents were asked how difficult it is for them to make their monthly DLC payments. Table VI-20 shows that while 78 percent of respondents found it somewhat or very difficult to make the payments before enrolling in CAP, only 13 percent reported that it was very or somewhat difficult to make their payments after enrolling in CAP.

**Table VI-20**  
**Monthly Bill Payment Difficulty**

<b>How easy or difficult was it to make your monthly Duquesne Light payments...</b>				
<b>Difficulty</b>	<b>CAP Participants</b>			
	<b>Before Participating in CAP</b>		<b>While Participating in CAP</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Very Easy	19	8%	114	49%
Somewhat Easy	20	9%	85	37%
Somewhat Difficult	76	33%	20	9%
Very Difficult	105	45%	9	4%
Don't Know	10	4%	2	1%
Refused	1	<1%	1	<1%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

Respondents were asked to compare their energy bills and usage before and after CAP participation. Table VI-21 shows while the majority reported lower energy bills (53 percent) and no change in usage (52 percent), about 10 percent report higher energy bills and higher usage, and 23 percent reported lower energy usage after enrolling in CAP.

**Table VI-21  
Change in Energy Bill and Usage**

While participating in CAP, would you say that your energy bill and usage is higher, lower, or has it not changed in comparison to what it was before participating in the program?				
Change	CAP Participants			
	Energy Bill		Energy Usage	
	#	%	#	%
Higher	21	9%	23	10%
Lower	122	53%	52	23%
No Change	54	23%	119	52%
Don't Know	33	14%	37	16%
Refused	1	<1%	0	0%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

Table VI-22 shows how important respondents felt CAP was in helping them meet their needs. Ninety percent of respondents said the program was very important, and seven percent said it was somewhat important.

One woman said she couldn't speak highly enough of the program and was eager to complete the survey because of how much it had helped her.

**Table VI-22  
Importance of CAP**

How important has CAP been in helping you to meet your needs?		
Importance	CAP Participants	
	#	%
Very Important	207	90%
Somewhat Important	16	7%
Of Little Importance	4	2%
Not At All Important	0	0%
Don't Know	4	2%
Refused	0	0%
<b>Total</b>	<b>231</b>	<b>100%</b>

Respondents were asked questions about LIHEAP assistance. Table VI-23 shows that 70 percent reported that someone in their household applied for LIHEAP, and 58 percent reported that they received LIHEAP benefits. Approximately ten percent of respondents indicated applying for LIHEAP but not receiving benefits.

**Table VI-23**  
**LIHEAP Application and Receipt**

In the past 12 months, did you or any member of your household apply for LIHEAP? In the past 12 months, did you or any member of your household receive home energy assistance benefits from LIHEAP?				
	CAP Participants			
	LIHEAP Application		LIHEAP Receipt	
	#	%	#	%
Yes	162	70%	135	58%
No	55	24%	23	10%
Don't Know	12	5%	4	2%
Refused	2	1%	0	0%
Did Not Apply <sup>1</sup>	-	-	69	30%
<b>Total</b>	<b>231</b>	<b>100%</b>	<b>231</b>	<b>100%</b>

<sup>1</sup>Only respondents who indicated not applying for LIHEAP were asked if they received LIHEAP.

Those respondents who reported that they did not apply for LIHEAP were asked why they did not apply. Table VI-24 displays the reported reasons including not knowing about the program (three percent), not needing assistance (three percent), and not knowing how or where to apply (three percent and two percent, respectively). A few respondents mentioned missing the application deadline (two percent) or not knowing they could be enrolled in both CAP and LIHEAP (two percent).

**Table VI-24**  
**Reasons for Not Applying to LIHEAP**

Why didn't you apply for LIHEAP?		
Reasons for Not Applying to LIHEAP	CAP Participants	
	#	%
Did Not Know About the Program	7	3%
Did Not Need Assistance	7	3%
Did Not Know How to Apply	6	3%
Did Not Know Where to Apply	5	2%
Application Deadline Had Passed	5	2%
Did Not Know That They Could Be on CAP and LIHEAP	4	2%
Income Too High	2	1%

Why didn't you apply for LIHEAP?		
Reasons for Not Applying to LIHEAP	CAP Participants	
	#	%
Did Not Qualify (Doesn't Pay for Gas)	2	1%
Application Process is Difficult	2	1%
Did Not Have Documentation	1	<1%
Other	5	2%
Don't Know	13	6%
Refused	4	2%
Applied for LIHEAP <sup>1</sup>	176	76%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

<sup>1</sup>Only respondents who indicated not applying for LIHEAP were asked why they did not apply.

Respondents were asked whether they felt that they needed additional assistance to pay their DLC bill. Table VI-25 shows that 38 percent reported that they needed additional assistance.

**Table VI-25**  
**Need for Additional Assistance**

Do you feel that you need additional assistance to pay your Duquesne Light bill?		
Need for Additional Assistance	CAP Participants	
	#	%
Yes	87	38%
No	123	53%
Don't Know	18	8%
Refused	3	1%
<b>Total</b>	<b>231</b>	<b>100%</b>

Those respondents who reported needing additional assistance to pay their DLC bill were asked the types of additional assistance they needed. Table VI-26 shows that most common types of additional assistance were more bill payment assistance (17 percent) and needing a lower bill (eight percent).

**Table VI-26  
Type of Additional Assistance**

What additional assistance do you need to pay your bill?		
Type of Additional Assistance	CAP Participants	
	#	%
More Bill Payment Assistance	40	17%
Lower Bill	19	8%
More Time to Pay the Bill	5	2%
Arrearage Forgiveness	5	2%
Increasing the Maximum Annual CAP Amount	6	3%
Other	6	3%
Don't Know	15	6%
Refused	8	3%
Did Not Need Additional Assistance <sup>1</sup>	144	62%
<b>Total</b>	<b>231</b>	<b>100%</b>

Note: Respondents could select more than one response.

<sup>1</sup>Only respondents who indicated needing additional assistance to pay their DLC bill were asked this question.

### **F. Program Satisfaction and Recommendations**

This section reports on respondents' satisfaction with CAP.

Respondents were asked how likely they are to continue to participate in CAP. Table VI-27 shows that 90 percent of respondents said they are very likely to continue, and seven percent said they are somewhat likely.

**Table VI-27  
Continuing CAP Participant**

How likely are you to continue to participate in CAP?		
Likelihood	CAP Participants	
	#	%
Very Likely	209	90%
Somewhat Likely	17	7%
Not Too Likely	1	<1%
Not At All Likely	1	<1%
Don't Know	2	1%
Refused	1	<1%
<b>Total</b>	<b>231</b>	<b>100%</b>

Respondents were asked how satisfied they are with CAP. Table VI-28 shows that 84 percent of respondents are very satisfied, and 13 percent are somewhat satisfied. About three percent of respondents indicated some dissatisfaction with the program.

A single mother pursuing her Master’s degree, shared that CAP helped her care for her children during a financially difficult time. She is no longer on CAP after receiving a raise but expressed deep gratitude for the support it provided when she needed it most.

**Table VI-28  
CAP Satisfaction**

Overall, how satisfied were you with CAP?		
Satisfaction	CAP Participants	
	#	%
Very Satisfied	193	84%
Somewhat Satisfied	30	13%
Somewhat Dissatisfied	5	2%
Very Dissatisfied	2	1%
Don’t Know	1	<1%
Refused	0	0%
<b>Total</b>	<b>231</b>	<b>100%</b>

Respondents who indicated dissatisfaction with CAP were asked for reasons for their dissatisfaction. Table VI-29 shows that the most common reasons were high bills or low CAP discounts (two percent), poor communication (one percent), and termination notices (one percent).

One respondent shared that each time she contacted Duquesne Light, she received different information from different employees, making it difficult to understand the recertification process and requiring multiple follow-up calls.

**Table VI-29  
Reasons for CAP Dissatisfaction**

What about CAP dissatisfied you?		
Reasons for CAP Dissatisfaction	CAP Participants	
	#	%
High Bill/Low CAP	5	2%
Poor Communication	2	1%
Shut off Notices	2	1%
Don’t Know	0	0%
Refused	1	<1%
Not Dissatisfied <sup>1</sup>	224	97%

What about CAP dissatisfied you?		
Reasons for CAP Dissatisfaction	CAP Participants	
	#	%
<b>Total</b>	<b>231</b>	<b>100%</b>

<sup>1</sup>Only respondents who indicated dissatisfaction with CAP were asked this question.

Respondents were asked for recommendations to improve CAP. Table VI-30 shows that the most common recommendations were improved communication (12 percent), an easier application/renewal process (six percent), and a lower monthly bill (six percent).

**Table VI-30**  
**CAP Recommendations**

What recommendations would you make to improve CAP?		
CAP Recommendations	CAP Participants	
	#	%
Improved Communication	28	12%
Easier Application/Renewal Process Easier	15	6%
Lower Monthly Bill	14	6%
Expand Income Eligibility	9	4%
Increase CAP Amount	9	4%
More Time to Recertify	5	2%
More Time to Pay Bill	3	1%
Stop Disconnections	2	1%
Other	7	3%
No Recommendation	104	45%
Don't Know	46	20%
Refused	5	2%
<b>Total</b>	<b>231</b>	<b>100%</b>

## G. Summary

This section provides a summary of the findings from the CAP participant survey.

### Participant Characteristics

The survey collected information on the characteristics of the participants and their homes.

- **Vulnerable Households:** Most respondents (75 percent) reported that they had at least one young child, elderly or disabled member in the household. The most common types of vulnerable household members were elderly (46 percent) and disabled (48 percent) household members.

- **Income Source:** Most respondents (82 percent) reported that they received non-cash benefits such as food stamps or public/subsidized housing, less than half (42 percent) received general or public assistance, about a third (34 percent) received retirement income and about one-fifth (21 percent) received wages or self-employment income.
- **Unemployment:** Twenty-seven percent of the respondents reported that someone in the household was unemployed and seeking work in the past 12 months.

#### CAP Information Source and Reason for Participation

The survey collected data on the CAP information source and motivation for participation in CAP.

- **Information Source:** The most common sources of information were word of mouth (20 percent) followed by Duquesne Light customer service representatives (19 percent) and Community Based Organizations or Social Service or Government Agencies (16 percent).
- **Reasons for CAP Enrollment:** Most respondents (57 percent) reported that they enrolled to reduce their energy bills. Other common reasons included financial issues (45 percent), even monthly payments (nine percent), and the need for assistance (seven percent).

#### Program Understanding

Respondents were asked several questions about their understanding of CAP. These are the customers' perceptions of their understanding of the program.

- **Customer Responsibilities:** Respondents were most likely to state that they needed to keep up with payments (74 percent). Other responsibilities reported included notifying DLC if their income changes (10 percent), recertifying or verifying income (nine percent), and conserving energy (four percent).
- **Program Benefits:** Most respondents reported reduced energy bills as a benefit of CAP (62 percent). Other benefits reported included even monthly payments (17 percent) and preventing service termination (14 percent).
- **Arrearage Forgiveness:** Seventeen percent of respondents reported they needed to make the monthly CAP payment on time and 13 percent reported that they needed to make a full payment to receive arrearage forgiveness.

#### Program Experience

Respondents were asked several questions about their experiences with CAP.

- **Monthly Payment Difficulty:** Most respondents (78 percent) found it somewhat or very difficult to make the payments before enrolling in CAP, but only 13 percent reported that it was very or somewhat difficult to make their payments after enrolling in CAP.
- **Change in Energy Bills:** The majority of respondents reported lower energy bills (53 percent) and no change in usage (52 percent) after enrolling in CAP. About ten percent

reported higher energy bills and higher usage after enrolling in CAP, and 23 percent reported lower energy usage after enrolling in CAP.

- **CAP Importance:** Ninety percent of respondents said that CAP was very important in helping them to meet their needs, and seven percent said it was somewhat important.
- **Additional Assistance:** Less than half (38 percent) of respondents reported that they needed additional assistance to pay their DLC Bill.

#### Program Satisfaction and Recommendations

Respondents were asked several questions about their satisfaction with CAP and recommendations for the program.

- **Continued Participation:** Ninety percent of respondents said they are very likely to continue participating in CAP, and seven percent said they are somewhat likely.
- **Satisfaction:** A majority of respondents (84 percent) reported being very satisfied with the program, and 13 percent report being somewhat satisfied.
- **Recommendations:** The most common recommendations provided by respondents were improved communication (12 percent), an easier application/renewal process (six percent), and a lower monthly bill (six percent).

## VII. CAP Impact Analysis

The evaluation analyzed CAP's impact on affordability, bill payment compliance, and collections actions. This section first describes the methodology for the analyses that were conducted and then the findings from the analyses.

### A. *Methodology*

This section describes the evaluation data and the selection of participants for the impact analysis.

#### **Evaluation Data**

DLC provided APPRISE with customer data, CAP program participation data, billing and payment data, and collections data for 2022 through 2024. DLC also provided data for LIHEAP participants who did not participate in CAP to be used as a comparison group.

These data were used for the following analyses.

- Characterizing program participants and program parameters.
- Selecting samples of current CAP participants for the customer survey.
- Conducting the impact analysis.

#### **Selected Participants**

Customers who enrolled in CAP between January 1, 2023 and December 31, 2023 and did not participate in CAP in the year prior to enrollment were included as potential members of the New 2023 CAP Enrollees Treatment Group. This group was chosen for the analysis, as one full year of post-program data is required for an analysis of program impacts. Additionally, results are presented for customers who received CAP credits at any time during 2024 to examine the broader population of CAP participants, as opposed to just the new CAP enrollees. These customers are referred to as All 2024 CAP Participants.

#### **Nonparticipant Comparison Group**

The Comparison Group was constructed to control for exogenous factors. The Comparison Group was designed to be as similar as possible to the New 2023 CAP Enrollees Treatment Group, those who received services and who we are evaluating, so that the exogenous changes for the Comparison Group are as similar as possible to those of the Treatment Group. The Comparison Group was a random sample of customers who received LIHEAP in 2023 or 2024 but did not participate in CAP between 2022 and 2024.

When measuring the impact of an intervention, it is necessary to recognize other exogenous factors that can impact changes in outcomes. Changes in a client's payment behavior and percent of bill paid, between the year preceding program enrollment and the year following enrollment, may be affected by many factors other than program services received. Some of these factors include changes in household composition or health of family members, changes in utility prices, changes in weather, and changes in the economy.

The ideal way to control for other factors that may influence payment behavior would be to randomly assign low-income customers to a treatment or control group. The treatment group would be given the opportunity to participate in the program first. The control group would not be given an opportunity to participate in the program until one full year later. This would allow evaluators to determine the impact of the program by subtracting the change in behavior for the control group from the change in behavior for the treatment group. Such random assignment is rarely done in practice because of a desire to include all eligible customers in the benefits of the program or to target a program to those who are most in need.

For the program impact analysis, we examined pre- and post-treatment statistics. The difference between the pre- and post-treatment statistics for the New 2023 CAP Enrollees Treatment Group is considered the gross change. This is the actual change in behaviors and outcomes for those participants who were served by the program. Some of these changes may be due to the program, and some of these changes are due to other exogenous factors, but this is the customer's actual experience. The net change is the difference between the change for the New 2023 CAP Enrollees Treatment Group and the change for the Comparison Group, and represents the actual impact of the program, controlling for other exogenous changes.

Customers who participated in CAP in the year prior to enrollment were excluded from the impact analysis, to allow for a comparison of data while not participating and while participating in CAP. Customers who did not have a full year of data prior to joining the program or a full year of data following the program start date were not included in the impact analysis. The subject of data attrition is addressed more fully below.

The data that were used for the New 2023 CAP Enrollees Treatment Group and the Comparison Group were as follows.

- New 2023 CAP Enrollees Treatment Group data extended from one year before the customer joined CAP to one year after the customer enrolled.
- Comparison Group data included one year of data before the mid-point of the first quarter of 2023 to one year of data after the mid-point of the last quarter of 2023.

Table VII-1 describes the New 2023 CAP Enrollees Treatment Group and Comparison Groups that are included in the analyses.

**Table VII-1**  
**New 2023 CAP Enrollees Treatment Group and Comparison Groups**

	<b>New 2023 CAP Enrollees Treatment Group</b>	<b>Nonparticipant Comparison Group</b>
<b>Group</b>	2023 CAP Enrollees	LIHEAP recipients
<b>Enrollment Requirement</b>	CAP enrollment date in 2023	Did not participate in CAP in 2022-2024
<b>CAP Participation</b>	Did not participate in CAP in year prior to enrollment	

	New 2023 CAP Enrollees Treatment Group	Nonparticipant Comparison Group
<b>Requirement</b>		
<b>Pre-Participation Dates</b>	1 year prior to CAP enrollment	One year prior to quasi enrollment dates of 2/15/23, 5/15/23, 7/15/23, 11/15/23
<b>Post-Participation Dates</b>	1 year after CAP enrollment	One year after quasi enrollment dates of 2/15/23, 5/15/23, 7/15/23, 11/15/23

In addition to the New 2023 CAP Enrollees Treatment Group and the Nonparticipant Comparison Group, we analyzed program statistics for all customers who participated in CAP in 2024. The New 2023 CAP Enrollees Treatment Group, described above, is a select group of customers who recently enrolled in 2023 and did not participate in CAP for at least a year before that enrollment. It is necessary to look at this subset of CAP participants to understand how the program impacted affordability and payment behavior. However, looking at all 2024 CAP participants provides a more comprehensive picture of the characteristics and benefits received by program participants. Therefore, we provide both types of analyses.

## **B. CAP Analysis**

This section examines data attrition and results for the CAP Analysis. The following information is summarized.

- Data Attrition
- CAP Participation
- CAP Credits
- Affordability Impacts
- Payment Impacts
- Arrearage Forgiveness
- Collections Impacts

### **Data Attrition**

Table VII-2 displays the data attrition for the 2024 CAP Participants, the New 2023 CAP Enrollees Treatment Group, and the Nonparticipant Comparison Group.

- 2024 CAP Participants: The table shows that 63 percent of All 2024 CAP participants could be included in the analysis. This is higher than for the New 2023 CAP Enrollees Treatment Group because this group only requires data to be available for 2024. Customers were primarily removed from this analysis group because they had fewer than 11 bills in 2024, or they were missing balance data.
- New 2023 CAP Enrollees Treatment Group: The table shows that 53 percent could be included in the analysis. Most customers were lost because they did not have a full year of pre- or post-enrollment billing data.

- Nonparticipant Comparison Group: 51 percent of these customers could be included in the analysis. Most of these customers were removed because they did not have a full year of pre- or post-enrollment billing data.

**Table VII-2  
Data Attrition**

	All 2024 CAP Participants		New 2023 CAP Enrollees		Nonparticipant Comparison Group	
	#	%	#	%	#	%
<b>Eligible Population</b>	<b>25,102</b>	<b>100%</b>	<b>5,040</b>	<b>100%</b>	<b>13,168</b>	<b>100%</b>
Insufficient Pre- or Post-Period Data	0	0%	1,339	27%	4,686	35%
Less than 11 Bills in a Period	2,414	10%	340	7%	1,095	8%
Missing Balance Data	6,371	25%	391	8%	338	3%
Data Outliers	621	2%	294	6%	255	2%
<b>Final Analysis Group</b>	<b>15,696</b>	<b>63%</b>	<b>2,676</b>	<b>53%</b>	<b>6,794</b>	<b>51%</b>

**CAP Participation**

Table VII-3 examines CAP participation for All 2024 CAP Participants and the New 2023 CAP Enrollees. The table shows that while 39 percent of All 2024 CAP Participants remained in the program for all of 2024, 44 percent of the New 2023 CAP Enrollees remained in CAP for the full year following participation. The final analysis group, those with sufficient data for the impact analysis, had a somewhat lower percentage that remained in CAP for the full year.

**Table VII-3  
Full Year CAP Participation**

	All 2024 CAP Participants				New 2023 CAP Enrollees			
	Eligible Population		Final Analysis Group		Eligible Population		Final Analysis Group	
	Obs.	%	Obs.	%	Obs.	%	Obs.	%
Full Year in CAP	9,772	39%	4,527	29%	2,232	44%	992	37%
Partial Year in CAP	15,330	61%	11,169	71%	2,808	56%	1,684	63%
<b>Total</b>	<b>25,102</b>	<b>100%</b>	<b>15,696</b>	<b>100%</b>	<b>5,040</b>	<b>100%</b>	<b>2,676</b>	<b>100%</b>

Table VII-4 displays the reasons for CAP removal. While 32 percent of All 2024 CAP Participants did not recertify, four percent refused Smart Comfort services.

**Table VII-4  
CAP Participation and Removal Reason**

	All 2024 CAP Participants		New 2023 CAP Enrollees	
	Obs.	%	Obs.	%
Did Not Recertify	8,082	32%	806	16%
Successful End	1,957	8%	724	14%
Refused Smart Comfort Services	951	4%	761	15%
Customer's Income Increased	565	2%	56	1%
Missed CAP Payments	309	1%	121	2%
Voluntarily Withdrawn	171	1%	27	1%
Other	7	<1%	2	<1%
Not Removed	13,060	52%	2,543	50%
<b>Total</b>	<b>25,102</b>	<b>100%</b>	<b>5,040</b>	<b>100%</b>

Table VII-5 displays the percentage of CAP participants who received the maximum CAP credit and the percent who were removed. While 23 percent of New 2023 CAP enrollees received the maximum credit, three percent received the maximum credit and were then billed for their actual usage. Increased maximum credits went into effect in December 2024, which reduced the percentage of participants that reach the maximum credit.

**Table VII-5  
CAP Maximum Credit**

	New 2023 CAP Enrollees	
	Obs.	%
<b>Final Analysis Group<sup>1</sup></b>	<b>2,676</b>	<b>100%</b>
Received Maximum Credit	623	23%
Received Maximum Credit and Not Removed	545	20%
Received Maximum Credit and Removed	78	3%

<sup>1</sup> Only the final analysis group has required data.

### **CAP Credits**

Table VII-6 displays the mean and median CAP credits. The mean CAP credit for all 2024 non-electric heating CAP participants in 2024 was \$811 and for electric heating CAP participants was \$804. CAP credits for New 2023 CAP Enrollees in the year following enrollment was similar.

**Table VII-6  
CAP Credits Received**

	All 2024 CAP Participants		New 2023 CAP Enrollees	
	Non-Electric Heating	Electric Heating	Non-Electric Heating	Electric Heating
<b>Final Analysis Group<sup>1</sup></b>	<b>14,065</b>	<b>1,631</b>	<b>2,437</b>	<b>239</b>
Mean Credit Amount	\$811	\$804	\$862	\$824
Median Credit Amount	\$743	\$572	\$793	\$618

<sup>1</sup> Only the final analysis group has the required data.

### **Affordability Impacts**

Table VII-7 displays the mean percent discount on the DLC bill in 2024 for All 2024 CAP Participants and in the year after CAP enrollment for the New 2023 CAP Enrollees. The table shows that the average annual CAP discount across all customers was 44 percent. Customers below 50 percent of the poverty level received an average annual discount of 57 percent.

**Table VII-7  
All 2024 CAP Participants and New 2023 CAP Enrollees  
Mean Percent Discount on Duquesne Light Bill by Poverty Level**

Poverty Level	All 2024 CAP Participants			New 2023 CAP Enrollees		
	Non-Electric Heating	Electric Heating	Total	Non-Electric Heating	Electric Heating	Total
<b>Observations</b>	14,065	1,631	15,696	2,437	239	2,676
≤ 50%	57%	52%	57%	60%	52%	59%
51-100%	46%	33%	45%	49%	32%	48%
101-150%	30%	24%	29%	29%	20%	28%
<b>Total</b>	<b>45%</b>	<b>35%</b>	<b>44%</b>	<b>45%</b>	<b>35%</b>	<b>44%</b>

Table VII-8 presents an analysis of the impact of CAP on the affordability of the electric bill for non-heating customers. The table shows that customers' bills declined after enrolling in CAP in addition to the mean discount of \$862 dollars that they received. The net change, compared to the nonparticipants, was a decline of \$1,361. Participants' mean energy burdens declined from 32 percent in the year prior to enrollment to 24 percent in the year following enrollment. When excluding customers with \$0 income (whose energy burdens are set to 100 percent in the analysis) and minimum payment customers, the mean energy burden for CAP participants declined to five percent in the year following enrollment.

**Table VII-8  
Affordability Impacts  
Non-Electric Heating Customers**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
<b>Observations<sup>†</sup></b>	2,437			5,706			
<b>Full Bill</b>	\$2,294	\$1,913	-\$381**	\$1,772	\$1,889	\$118**	-\$498**
<b>CAP Discount</b>	\$0	\$862	\$862**	-	-	-	\$862**
<b>Discounted Bill</b>	\$2,294	\$1,050	-\$1,243**	\$1,772	\$1,889	\$118**	-\$1,361**
<b>Energy Burden</b>	32%	24%	-8%**	29%	30%	1%**	-9%**
<b>Energy Burden Excluding \$0 Income and Minimum Payment Customers</b>	12%	5%	-7%**	17%	18%	1%**	-8%**

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

<sup>†</sup> For energy burden, the New 2023 CAP Enrollees are missing five observations, and the Nonparticipant Comparison Group is missing 1,779 observations due to incomplete income data. The energy burden row excluding \$0 income customers includes 1,710 New 2023 CAP enrollees and 3,370 Nonparticipant Comparison Customers.

Table VII-9 presents an analysis of the impact of CAP on the affordability of the electric bill for electric heating customers. These customers saw a similar decline in bills and in the energy burden. The net reduction in bills for electric heating customers was \$1,363 and the mean energy burden declined from 38 percent to 32 percent, a reduction of seven percentage points. When excluding customers with \$0 income (whose energy burdens are set to 100 percent in the analysis) and minimum payment customers, the mean energy burden for CAP participants declined to eight percent in the year following enrollment.

**Table VII-9  
Affordability Impacts  
Electric Heating Customers**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
<b>Observations<sup>†</sup></b>	239			1,088			
<b>Full Bill</b>	\$2,593	\$2,253	-\$341**	\$1,681	\$1,878	\$197**	-\$538**
<b>CAP Discount</b>	\$0	\$824	\$824**	-	-	-	\$824**
<b>Discounted Bill</b>	\$2,593	\$1,428	-\$1,165**	\$1,681	\$1,878	\$197**	-\$1,363**
<b>Energy Burden</b>	38%	32%	-7%**	29%	30%	1%**	-8%**
<b>Energy Burden Excluding \$0 Income and Minimum Payment Customers</b>	14%	8%	-6%**	16%	17%	1%**	-7%**

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

<sup>†</sup> For energy burden, the Nonparticipant Comparison Group is missing 458 observations. The energy burden row excluding \$0 income customers includes 156 New 2023 CAP enrollees and 536 Nonparticipant Comparison Customers.

The Pennsylvania Public Utility Commission has set targets for CAP participants’ energy burdens by heating fuel and poverty level. Table VII-10A displays the mean energy burden for All 2024 CAP Participants by poverty level and the percentage of customers whose energy burden exceeded the PUC target. Energy burdens in this table are calculated based upon the monthly CAP payment amount. The table shows a mean energy burden of 51 percent for non-electric heating customers with income below 50 percent of the poverty level and that 82 percent of these customers had a burden over the PUC target. (This is due to customers with very low incomes who have the minimum CAP payment amount.) However, the mean energy burden for customers with income between 101 and 150 percent of the poverty level was four percent, and only one percent of these customers had an energy burden above the PUC target.

**Table VII-10A  
Electric Burden and Relationship to PUC Target  
Based Upon CAP Payment Amount  
All 2024 CAP Participants**

Poverty Level	Non-Electric Heating				Electric Heating			
	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target
≤ 50%	4,225	51%	2%	82%	386	61%	6%	77%
51 – 100%	5,722	4%	4%	1%	796	9%	10%	0%
101 – 150%	4,114	4%	4%	1%	449	7%	10%	0%
<b>Total</b>	<b>14,061</b>	<b>18%</b>	-	<b>25%</b>	<b>1,631</b>	<b>21%</b>	-	<b>18%</b>

<sup>†</sup>17 non-electric heating customers and 1 electric customer had income above 150% of the poverty level and were excluded from the analysis. Some of these customers were grandfathered senior CAP participants. However, the majority were customers who were removed from CAP following update of their income data. The data shown in the table represent the income level at the time the customer qualified for CAP.

Table VII-10B displays the mean energy burden for CAP participants by poverty level and the percentage of customers whose energy burden exceeded the PUC target. Energy burdens in this table are calculated based upon the 2024 billing data. The table shows a mean energy burden of 56 percent for non-electric heating customers with income below 50 percent of the poverty level and that 95 percent of these customers had a burden over the PUC target. The mean energy burden for customers with income between 101 and 150 percent of the poverty level was five percent, and 37 percent of these customers had an energy burden above the PUC target. Energy burdens in this table are higher because bills increase when customers are removed from CAP.

**Table VII-10B**  
**Electric Burden and Relationship to PUC Target**  
**Based Upon Billing Data**  
**All 2024 CAP Participants**

Poverty Level	Non-Electric Heating				Electric Heating			
	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target
≤ 50%	4,225	56%	2%	95%	386	66%	6%	91%
51 – 100%	5,722	6%	4%	44%	796	9%	10%	20%
101 – 150%	4,114	5%	4%	37%	449	7%	10%	10%
<b>Total</b>	<b>14,061</b>	<b>21%</b>	<b>-</b>	<b>57%</b>	<b>1,631</b>	<b>22%</b>	<b>-</b>	<b>34%</b>

<sup>†17</sup> non-electric heating customers and 1 electric customer had income above 150% of the poverty level and were excluded from the analysis. Some of these customers were grandfathered senior CAP participants. However, the majority were customers who were removed from CAP following update of their income data. The data shown in the table represent the income level at the time the customer qualified for CAP.

Table VII-11A excludes customers who had minimum payments and who were not on CAP for the full year. Energy burdens in this table are calculated based upon the monthly CAP payment amount. The table shows a mean energy burden of three percent for non-electric heating customers with income below 50 percent of the poverty level and that four percent of these customers had a burden over the PUC target (because of a change in the income or poverty level during the year). The mean energy burden for customers with income between 101 and 150 percent of the poverty level was four percent, and less than one percent of these customers had an energy burden above the PUC target.

**Table VII-11A**  
**Electric Burden and Relationship to PUC Target**  
**Based Upon CAP Payment Amount**  
**All Full Year 2024 CAP Participants Who Don't Have a Minimum Payment**

Poverty Level	Non-Electric Heating				Electric Heating			
	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target
≤ 50%	26	3%	2%	4%	9	6%	6%	0%
51 – 100%	2,099	4%	4%	<1%	352	9%	10%	0%
101 – 150%	1,292	4%	4%	<1%	195	8%	10%	0%
<b>Total</b>	<b>3,417</b>	<b>4%</b>	<b>-</b>	<b>&lt;1%</b>	<b>556</b>	<b>8%</b>	<b>-</b>	<b>0%</b>

<sup>†2</sup> non-electric heating customers had income above 150% of the poverty level and were excluded from the analysis. Some of these customers were grandfathered senior CAP participants. However, the majority were customers who were removed from CAP following update of their income data. The data shown in the table represent the income level at the time the customer qualified for CAP.

Table VII-11B excludes customers who had minimum payments and who were not on CAP for the full year. Energy burdens in this table are calculated based upon the annual bill. The table shows a mean energy burden of three percent for non-electric heating customers with income below 50 percent of the poverty level and that four percent of these customers had a burden over the PUC target. The mean energy burden for customers with income between 101 and 150 percent of the poverty level was three percent, and less than one percent of these customers had an energy burden above the PUC target.

**Table VII-11B**  
**Electric Burden and Relationship to PUC Target**  
**Based Upon Billing Data**  
**All Full Year 2024 CAP Participants Who Don't Have a Minimum Payment**

Poverty Level	Non-Electric Heating				Electric Heating			
	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target	Obs.	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target
≤ 50%	26	3%	2%	4%	9	5%	6%	0%
51 – 100%	2,099	4%	4%	<1%	352	8%	10%	0%
101 – 150%	1,292	3%	4%	<1%	195	6%	10%	0%
<b>Total</b>	<b>3,417</b>	<b>4%</b>	<b>-</b>	<b>&lt;1%</b>	<b>556</b>	<b>7%</b>	<b>-</b>	<b>0%</b>

<sup>†</sup>2 non-electric heating customers had income above 150% of the poverty level and were excluded from the analysis. Some of these customers were grandfathered senior CAP participants. However, the majority were customers who were removed from CAP following update of their income data. The data shown in the table represent the income level at the time the customer qualified for CAP.

### **Payment Impacts**

Table VII-12 displays the impact of CAP on bills and payments for non-electric heating customers. The table shows the following impacts.

- **Total Charges:** These are the charges for current bills over the 12 months before and after CAP enrollment. There was a mean decline of \$494.
- **CAP Credit:** In addition to the bill reduction, CAP participants received a mean CAP credit of \$862.
- **Assistance:** CAP participants had a \$132 net reduction in LIHEAP grants and a \$16 net reduction in Dollar Energy Fund credits.
- **On-Time Payments:** CAP participants had a net increase of 2.8 on-time payments in the year after CAP enrollment.
- **Cash Payments:** These payments declined by \$614.
- **Total Credits:** Payments and other credits declined by a mean of \$649.
- **Shortfall:** As a result of the reduced bill, the shortfall declined by a mean of \$712.

- **Total Coverage Rate:** The percentage of charges covered by payments and other credits increased from an average of 74 percent in the year prior to enrollment to 111 percent in the year following enrollment, a net increase of 38 percentage points.

The statistics described above include charges and credits for the year before and the year after CAP enrollment. Some customers begin the analysis year with a credit on their account, usually because they received a LIHEAP grant or they had their security deposit refunded. This credit is factored into the customer's total payments and credits for the year. However, when examining changes in balances, these credits are already accounted for, so additional "non-adjusted" payments and shortfall are calculated that match the changes in balances.

- **Frozen Balance:** This is the amount of pre-program arrearages that are set aside when the customer enrolls in CAP. The frozen balance declined by an average of \$278.
- **Unfrozen Balance:** The unfrozen balance is balance that excludes the frozen pre-program arrearages.
- **Total Balance:** Customer balances declined by an average of \$358, mostly due to the arrearage forgiveness received, which averaged \$278.

**Table VII-12**  
**New 2023 CAP Enrollees and Comparison Group**  
**Payment Impacts, Non-Electric Heating Customers**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
<b>Observations</b>	2,437			5,706			
Energy Charges	\$2,269	\$1,907	-\$362**	\$1,769	\$1,901	\$132**	-\$494**
Late Payment Charge	\$34	>-\$1	-\$34**	\$16	\$12	-\$4**	-\$30**
Adjustments	-\$9	\$6	\$15**	-\$13	-\$24	-\$11**	\$26**
Total Bill	\$2,294	\$1,913	-\$381**	\$1,772	\$1,889	\$118**	-\$498**
Collection Related Charges <sup>†</sup>	\$42	\$6	-\$37**	\$21	\$18	-\$4**	-\$33**
CAP Credits	\$0	\$862	\$862**	-	-	-	\$862**
CAP Bill	\$2,294	\$1,050	-\$1,243**	\$1,772	\$1,889	\$118**	-\$1,361**
Customer Payments	\$1,411	\$817	-\$594**	\$1,236	\$1,256	\$20*	-\$614**
# On-Time Payments	6.4	8.8	2.4**	8.6	8.2	-0.4**	2.8**
LIHEAP Cash & Crisis Grants	\$150	\$70	-\$80**	\$344	\$395	\$52**	-\$132**
Dollar Energy Fund	\$37	\$4	-\$33**	\$23	\$6	-\$17**	-\$16**
Other Credits	\$9	\$10	<\$1	\$1	\$3	\$2	-\$2
Total Payments & Credits	\$1,632	\$1,072	-\$559**	\$1,645	\$1,734	\$89**	-\$649**
Total Coverage Rate	74%	111%	37%**	99%	98%	-1%	38%**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
Shortfall	\$662	-\$22	-\$684**	\$126	\$155	\$29**	-\$712**
Non-Adjusted Total Payments & Credits <sup>#</sup>	\$1,608	\$901	-\$707**	\$1,603	\$1,660	\$57**	-\$764**
Non-Adjusted Shortfall <sup>##</sup>	\$686	\$150	-\$536**	\$169	\$230	\$61**	-\$597**
Arrearage Forgiveness	\$0	\$278	\$278**	-	-	-	\$278**
Frozen Balance	\$995	\$717	-\$278**	-	-	-	-\$278**
Unfrozen Balance	\$64	\$214	\$150**	\$346	\$575	\$230**	-\$80**
Total Balance	\$1,059	\$931	-\$128**	\$346	\$575	\$230**	-\$358**

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

† “Collection Related Charges” include Late Payment Charge, Return Check Fee, and Reconnection Fee.

# Total Payments & Credits occurred in the year prior to and year following enrollment before adjusting for credit balances at the start of each year.

## Shortfall based on Non-Adjusted Total Payments & Credits.

Table VII-13 shows approximately the same results for the electric heating customers. Their total coverage rate, or the percent of bills covered with all payments and credits, increased from 74 percent in the year prior to enrollment to 109 percent in the year following enrollment. The net change was an increase of 42 percentage points, as the comparison group experienced a reduction in their coverage rate.

**Table VII-13**  
**New 2023 CAP Enrollees and Comparison Group**  
**Payment Impacts, Electric Heating Customers**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
<b>Observations</b>	239			1,088			
Energy Charges	\$2,574	\$2,246	-\$327**	\$1,687	\$1,876	\$189**	-\$517**
Late Payment Charge	\$32	>-\$1	-\$33**	\$11	\$10	>-\$1	-\$32**
Adjustments	-\$13	\$7	\$19**	-\$16	-\$8	\$9**	\$11
Total Bill	\$2,593	\$2,253	-\$341**	\$1,681	\$1,878	\$197**	-\$538**
Collection Related Charges <sup>†</sup>	\$40	\$6	-\$34**	\$14	\$14	>-\$1	-\$34**
CAP Credits	\$0	\$824	\$824**	-	-	-	\$824**
CAP Bill	\$2,593	\$1,428	-\$1,165**	\$1,681	\$1,878	\$197**	-\$1,363**
Customer Payments	\$1,545	\$1,022	-\$523**	\$1,102	\$1,241	\$139**	-\$662**
# On-Time Payments	6.5	9.6	3.1**	10.1	9.4	-0.7**	3.8**
LIHEAP Cash & Crisis Grant	\$255	\$171	-\$84**	\$469	\$384	-\$85**	\$1
Dollar Energy Fund	\$46	\$3	-\$44**	\$18	\$5	-\$12**	-\$31**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
Other Credits	\$0	\$33	\$33	\$0	\$0	\$0	\$33**
Total Payments & Credits	\$1,875	\$1,451	-\$424**	\$1,697	\$1,782	\$85**	-\$509**
Total Coverage Rate	74%	109%	35%**	113%	105%	-8%**	42%**
Shortfall	\$719	-\$23	-\$741**	-\$16	\$97	\$113**	-\$854**
Non-Adjusted Total Payments & Credits <sup>#</sup>	\$1,846	\$1,227	-\$618**	\$1,589	\$1,630	\$41	-\$659**
Non-Adjusted Shortfall <sup>##</sup>	\$748	\$201	-\$547	\$92	\$248	\$157**	-\$703**
Arrearage Forgiveness	\$0	\$304	\$304**	-	-	-	\$304**
Frozen Balance	\$1,100	\$796	-\$304**	-	-	-	-\$304**
Unfrozen Balance	\$2	\$203	\$201**	\$121	\$369	\$248**	-\$47
Total Balance	\$1,102	\$998	-\$103**	\$121	\$369	\$248**	-\$351**

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

† “Collection Related Charges” include Late Payment Charge, Return Check Fee, and Reconnection Fee.

# Total Payments & Credits occurred in the year prior to and year following enrollment before adjusting for credit balances at the start of each year.

##Shortfall based on Non-Adjusted Total Payments & Credits.

Table VII-14 displays the distribution of bill coverage rates for all 2024 CAP participants. The table shows that 77 percent of full year CAP participants paid their full bill.

**Table VII-14  
All CAP 2024 Participants  
Bill Coverage Rates**

Coverage Rate	All 2024 CAP Participants			
	Non-Electric Heating		Electric Heating	
	Full Year	Not Full Year	Full Year	Not Full Year
<b>Observations</b>	3,933	10,132	594	1,037
≥ 100%	77%	47%	77%	52%
90%-99%	15%	13%	14%	11%
80%-89%	4%	9%	5%	10%
< 80%	4%	31%	4%	27%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Mean Coverage Rate</b>	<b>111%</b>	<b>95%</b>	<b>122%</b>	<b>101%</b>

Table VII-15 displays the distribution of coverage rates for the New 2023 CAP Enrollees in the year prior to and in the year following CAP enrollment. The table shows a large improvement in payment coverage rates after enrollment. For example, while 16 percent of

the non-electric heating customers paid their full bill in the year prior to CAP enrollment, 52 percent did so in the year following enrollment. Approximately the same results are seen for the Electric Heating customers.

**Table VII-15  
New CAP 2023 Enrollees and Comparison Group  
Bill Coverage Rates**

Coverage Rate	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
<b>Electric Heating</b>							
<b>Observations</b>	239			1,088			
≥ 100%	16%	52%	36%**	66%	54%	-11%**	47%**
90%-99%	16%	20%	3%	15%	19%	4%**	-1%
80%-89%	16%	13%	-3%	7%	11%	4%**	-7%**
< 80%	52%	15%	-36%**	13%	16%	3%**	-40%**
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>-</b>
<b>Mean Coverage Rate</b>	<b>74%</b>	<b>109%</b>	<b>35%**</b>	<b>113%</b>	<b>105%</b>	<b>-8%**</b>	<b>42%**</b>
<b>Non-Electric Heating</b>							
<b>Observations</b>	2,437			5,706			
≥ 100%	15%	54%	39%**	52%	50%	-2%**	40%**
90%-99%	15%	18%	3%**	16%	17%	1%*	2%
80%-89%	15%	10%	-4%**	10%	10%	1%	-5%**
< 80%	56%	19%	-37%**	22%	22%	>-1%	-37%**
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>-</b>
<b>Mean Coverage Rate</b>	<b>74%</b>	<b>111%</b>	<b>37%**</b>	<b>99%</b>	<b>98%</b>	<b>-1%</b>	<b>38%**</b>
<b>All Customers</b>							
<b>Observations</b>	2,676			6,794			
≥ 100%	15%	54%	38%**	54%	51%	-3%**	42%**
90%-99%	15%	18%	3%**	16%	18%	2%**	1%
80%-89%	15%	10%	-4%**	9%	10%	1%**	-6%**
< 80%	55%	18%	-37%**	21%	21%	<1%	-37%**
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>-</b>
<b>Mean Coverage Rate</b>	<b>74%</b>	<b>111%</b>	<b>37%**</b>	<b>102%</b>	<b>99%</b>	<b>-2%**</b>	<b>39%**</b>

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

Table VII-16 displays the distribution of the number of on-time payments for the CAP participants. The table shows that most participants made at least seven on-time payments, and the mean number of on-time payments was 11.

**Table VII-16**  
**All CAP 2024 Participants and New 2023 CAP Enrollees**  
**Number of On-Time Payments**

	All 2024 CAP Participants		New 2023 CAP Enrollees	
	Electric Heating	Non-Electric Heating	Electric Heating	Non-Electric Heating
<b>Observations</b>	1,631	14,065	239	2,437
<=3	1%	2%	4%	4%
4-6	4%	4%	21%	27%
7-11	52%	42%	31%	36%
12+	43%	52%	44%	33%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Mean # of On-Time Payments</b>	<b>11.0</b>	<b>11.0</b>	<b>9.6</b>	<b>8.9</b>

Table VII-17 displays changes in on-time bill payment for the New 2023 CAP Enrollees and the Comparison Group. The table shows that the CAP participants increased the mean number of on-time payments from an average of 6.4 in the year before CAP enrollment to an average of 8.8 in the year after CAP enrollment, while the nonparticipants had a small decline in the number of on-time payments, so the net change was an increase of 2.8 on-time payments.

**Table VII-17**  
**New 2023 CAP Enrollees and Nonparticipant Comparison Group**  
**Number of On-Time Payments**  
**Non-Electric Heating Customers**

	New 2023 CAP Enrollees			Nonparticipant Comparison Group			Net Change
	Pre	Post	Change	Pre	Post	Change	
Observations	2,437			5,706			
<=3	26%	4%	-22%**	14%	16%	3%**	-25%**
4-6	35%	27%	-8%**	24%	25%	1%	-9%**
7-11	25%	36%	12%**	29%	34%	5%**	7%**
12+	14%	33%	19%**	33%	25%	-9%**	28%**
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>100%</b>	<b>100%</b>	<b>-</b>	<b>-</b>
<b>Mean # of On-Time Payments</b>	<b>6.4</b>	<b>8.8</b>	<b>2.4**</b>	<b>8.6</b>	<b>8.2</b>	<b>-0.4**</b>	<b>2.8**</b>

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

**Arrearage Forgiveness**

Table VII-18 displays the percent of customers who received arrearage forgiveness, the mean number of arrearage forgiveness credits, the mean amount forgiven, and the median amount forgiven. The table shows that 37 percent of all 2024 CAP participants received arrearage forgiveness and 97 percent of New 2023 CAP Enrollees received arrearage forgiveness. A lower percentage of 2024 CAP participants received arrearage forgiveness because they were less likely to have pre-program arrearages remaining. The mean amount of arrearages forgiven for New 2023 CAP enrollees was \$280.

**Table VII-18  
All 2024 CAP Participants and New 2023 CAP Enrollees  
Arrearage Forgiveness Received**

	Obs.	% Received Arrearage Forgiveness	Mean # of Arrearage Forgiveness Payments	Mean Forgiven	Median Forgiven
<b>Forgiveness Received in 2024</b>					
All CAP 2024 Participants	15,696	37%	1.9	\$74	\$0
All CAP 2024 Participants – Full Year CAP	4,527	16%	1.2	\$27	\$0
<b>Forgiveness Received in Year after Enrollment</b>					
New 2023 CAP Enrollees	2,676	97%	7.7	\$280	\$178
New 2023 CAP Enrollees – Full Year CAP	992	99%	9.2	\$265	\$187

Table VII-19 displays total account balances, including frozen arrearages at the start and end of the year after CAP enrollment for the New 2023 CAP enrollees and at the same time for the Comparison Group. The table shows that arrearages declined by \$359 overall compared to the Comparison Group. Customers with income between 51 and 100 percent of the poverty level experienced a balance reduction of \$319 as compared to the Comparison Group.

**Table VII-19  
New CAP 2023 Enrollees and Comparison Group  
Mean Total Arrearages at Start and End of Year Following CAP Enrollment  
by Poverty Level**

Poverty Level	New 2023 CAP Enrollees				Nonparticipant Comparison Group				Net Change
	Obs.	Start	End	Change	Obs.	Start	End	Change	
≤ 50%	859	\$1,107	\$1,016	-\$91**	6,542	\$300	\$529	\$229**	-\$319**
51-100%	838	\$1,014	\$840	-\$174**	232	\$549	\$908	\$359**	-\$533**
101-150%	979	\$1,066	\$951	-\$116**	20	\$533	\$665	\$132	-\$248**
<b>Total</b>	<b>2,676</b>	<b>\$1,063</b>	<b>\$937</b>	<b>-\$126**</b>	<b>6,794</b>	<b>\$310</b>	<b>\$542</b>	<b>\$233**</b>	<b>-\$359**</b>

\*\* Denotes significance at the 95% level. \* Denotes significance at the 90% level.

### Collections Impacts

Table VII-20 displays the percent of CAP customers that had one or more collections calls and letters. The table shows that a significant percentage of customers had each of the collections actions while participating in CAP. Seventy percent of non-electric heating customers had one or more collections actions in 2024.

**Table VII-20  
All 2024 CAP Participants and New 2023 CAP Enrollees  
Collections Actions**

	All 2024 CAP Participants		New 2023 CAP Enrollees	
	Non-Electric Heating	Electric Heating	Non-Electric Heating	Electric Heating
<b>Observations</b>	14,065	1,631	2,437	239
Calls	1.6	1.4	2.1	2.5
Letters	3.4	3.1	4.0	4.1
<b>Total</b>	<b>5.0</b>	<b>4.6</b>	<b>5.7</b>	<b>6.1</b>
<b>% With 1+ Actions</b>	<b>70%</b>	<b>65%</b>	<b>78%</b>	<b>79%</b>

Table VII-21 displays the percent of New 2023 CAP Enrollees and Comparison Group customers with one or more collections actions. The table shows that there was a 15 percentage point reduction for New 2023 CAP Enrollees and a one percentage point reduction for the Comparison Group, for a net reduction of 14 percentage points. Customers with income at or below 50 percent of the poverty level had the greatest reduction in collections actions.

**Table VII-21  
New 2023 CAP Enrollees and Comparison Group  
Percent with One or More Collections Actions  
by Poverty Level**

Poverty Level	New 2023 CAP Enrollees				Nonparticipant Comparison Group				Net Change
	Obs.	Pre	Post	Change	Obs.	Pre	Post	Change	
≤50%	859	97%	76%	-21%**	6,542	67%	66%	-1%**	-20%**
50-100%	838	92%	75%	-18%**	232	91%	89%	-2%	-16%**
100-150%	979	91%	83%	-8%**	20	100%	95%	-5%	-3%
<b>Total</b>	<b>2,676</b>	<b>93%</b>	<b>78%</b>	<b>-15%**</b>	<b>6,794</b>	<b>68%</b>	<b>67%</b>	<b>-1%**</b>	<b>-14%**</b>

\*\* Denotes significance at the 95% level.

Table VII-22 displays the percent of New 2023 CAP Enrollees and Comparison Group customers with one or more disconnections in the year after CAP enrollment. The table shows that there was a 14 percentage point reduction for New 2023 CAP Enrollees and a

one percentage point reduction for the Comparison Group, for a net reduction of 13 percentage points. Customers with income between 100 and 150 percent of the poverty level had the greatest net reduction disconnections.

**Table VII-22**  
**New 2023 CAP Enrollees and Comparison Group**  
**Percent with One or More Disconnections**  
**by Poverty Level**

Poverty Level	New 2023 CAP Enrollees				Nonparticipant Comparison Group				Net Change
	Obs.	Pre	Post	Change	Obs.	Pre	Post	Change	
≤50%	859	33%	13%	-20%**	6,542	18%	18%	-1%	-19%**
50-100%	838	26%	14%	-12%	232	20%	19%	-1%	-12%**
100-150%	979	21%	12%	-9%**	20	10%	30%	20%**	-29%**
Total	2,676	27%	13%	-14%**	6,794	18%	18%	>-1%	-13%**

\*\* Denotes significance at the 95% level.

### C. Summary

This section provides a summary of the findings from the CAP impact analysis.

- **CAP Maximum Credit:** While 23 percent of New 2023 CAP Enrollees received the maximum credit, 20 percent received the maximum credit and were not removed from CAP prior to the end of the year. Three percent received the maximum credit and were removed. Increased maximum credits went into effect in December 2024, which reduced the percentage of participants that reach the maximum credit.
- **CAP Credits:** The mean annual 2024 CAP credit for All 2024 CAP Participants was \$811 for non-electric participants and \$804 and for electric heating participants.
- **CAP Discount:** The average annual CAP discount across CAP participants was 44 percent. Customers below 50 percent of the poverty level received an average annual discount of 57 percent.
- **Energy Burden:** Non-electric heating CAP participants' mean energy burdens declined from 32 percent in the year prior to enrollment to 24 percent in the year following enrollment. When excluding customers with \$0 income (whose energy burdens are set to 100 percent in the analysis) and minimum payment customers, the mean energy burden for CAP participants declined to five percent in the year following enrollment. For electric heating CAP participants, excluding those with \$0 incomes and minimum payments, the mean energy burden declined from 14 percent in the year prior to CAP enrollment to eight percent in the year following CAP enrollment.
- **Bill Payment:** CAP participants improved their bill payment after enrolling in the program. Non-electric heating customers had a net increase of 2.8 payments in the year

following CAP enrollment, and electric heating customers had a net increase of 3.8 payments in the year following CAP enrollment.

The percentage of charges covered by CAP participants' payments and other credits increased from an average of 74 percent in the year prior to enrollment to 111 percent in the year following enrollment, a net increase of 38 percentage points for non-electric heating customers. Electric heating customers had a net increase in coverage rates of 42 percentage points.

- **Arrearage Forgiveness:** The analysis found that 97 percent of New 2023 CAP Enrollees received arrearage forgiveness in the year following CAP enrollment. The mean amount of arrearages forgiven for New 2023 CAP enrollees was \$280.
- **Collections Actions:** There was a 15 percentage point reduction in the percentage of customers with one or more collections actions for New 2023 CAP Enrollees in the year following CAP enrollment, and a one percentage point reduction for the Comparison Group, for a net reduction of 14 percentage points. Customers with income at or below 50 percent of the poverty level had a 20 percentage point net reduction in the percent with one or more collections actions during the year.
- **Disconnections:** There was a 14 percentage point reduction in the percentage of customers with one or more disconnections for New 2023 CAP Enrollees in the year following CAP enrollment, and a one percentage point reduction for the Comparison Group, for a net reduction of 13 percentage points. Customers with income at or below 50 percent of the poverty level had a 19 percentage point net reduction in the percent with one or more disconnections during the year.

## VIII. Findings and Recommendations

The evaluation found that DLC's Universal Service programs are well-designed and that Duquesne Light has effectively worked with administering agencies to implement these programs. The programs have been improved to provide greater benefits, reduce participant burden, and deliver more holistic services since the last evaluation. This section provides recommendations for DLC to consider to potentially improve the effectiveness of these programs.

### A. *Universal Service Program Approach*

DLC is committed to delivering Universal Service Programs in a more holistic manner to more effectively address the needs of their low-income customers. They expect to implement some changes in their next Universal Service Plan to move toward this goal. Some considerations for DLC that were brought to light in manager interviews include the following.

- **Proactive Approach:** Work to address customer payment problems before they achieve a level of debt that is very difficult to recover from.
- **Collaborative Action:** Break down the silos between assistance organizations that provide various program services.
- **Simplification:** Wherever possible, simplify programs to improve customer understanding of the various assistance options available to them.
- **Administration:** Implement more accessible, self-service options that allow customers to check information independently. For example, creating a portal where customers can check their program status, apply, or verify income.

### B. *CAP Design*

Duquesne made several changes in their 2020-2025 Universal Service Plan that improved the program and increased customer benefits.

- **Payment Design:** CAP was changed from a Percent of Budget Program to a Percentage of Income Payment Program (PIPP), targeting lower customer energy burdens. This has resulted in large affordability improvements compared to the previous CAP design.
- **Minimum Payment:** The monthly minimum payment for non-electric heating customers was increased from \$15 to \$20.
- **Re-Certification:** \$0 income customers are required to recertify every six months.
- **Arrearage Forgiveness:** Customers were given an opportunity to have existing in-program arrearages forgiven when DLC transitioned to the new, more affordable PIPP.

- Monthly Customer Bill: DLC developed and implemented a revised and simplified bill design that clearly presents information on the CAP bill, maximum credit, and arrearages.
- CAP Application Method: Customers do not have to visit the CBO and can submit an online CAP application.
- Maximum CAP Credits: DLC recently increased the maximum CAP credits because of rate increases and rising energy costs. This has reduced the number of customers reaching the limit.

The agencies reported several program successes.

- Agency Services: Many customers come to the agency offices to request help and resources. Customers sometimes come in with a pile of bills and the agency staff help them to sort out the priorities.
- System Access: DLC provides system access to agency workers so they can assess the customer's situation and provide the most appropriate assistance.
- Accessibility: The agency has many Spanish speaking staff, as well as staff members speaking other languages.
- Automated Letters: DLC has automated over income and enrollment letters, which has reduced this type of manual work.
- CAP Maximum Credit Letters: The letters that DLC sends to inform customers that they have reached 75 percent of the maximum credit have increased understanding of the CAP credit limit.
- CAP Benefits: The agencies report that the program is working well, it is a big help for customers, and it is reaching a large number of customers. They report that customers feel empowered when they have obtained an affordable bill.
- Arrearage Forgiveness: Agency staff report that the arrearage forgiveness is a big incentive to pay the CAP amount and maintain electric service

*The CAP design is working well, and we do not make recommendations for changes to the current design.*

### **C. CAP Enrollment and Recertification**

DLC and CBOs reported some challenges in CAP administration.

- CAP Enrollment: The agencies reported challenges and burden faced with CAP enrollment activities. The system allows customers to submit incomplete applications, which requires the agencies to spend a lot of time following up with customers. The agency makes a few attempts to contact the customer to complete the application and

then closes the application if there is no response. If the customer responds later, the agency needs updated income information within 30 days of the application.

*Recommendation: DLC should prioritize developing options to reduce the application burden for both customers and CBOs. This could include the following.*

- *LIHEAP Data Sharing: DLC is setting up to coordinate CAP enrollment with the Pennsylvania Department of Human Services (DHS). Initially, CAP auto-enrollments will not be handled in DLC's system, but the CBOs will use that data and ask new CAP customers if they want to be enrolled. DLC estimates that these procedures will become fully system-automated in 2026 or 2027.*
  - *LIHEAP Application: DLC will also participate when the DHS adds a box to the LIHEAP application that allows customers to opt-in to CAP enrollment.*
  - *Text Communications: Other utilities are introducing increased use of texting to notify customers of specific information or documentation that is missing from their applications. The customer can respond by using a link provided, taking pictures on their phone, and directly sending those pictures. Because customers can currently opt out of text notifications, this may require additional steps such as having customers opt into text messaging when they apply for CAP.*
- **\$0 Income Customers:** There are a substantial number of CAP customers who are on the minimum payment because they report \$0 income. Customers don't always understand what should be reported as income, especially if they are self-employed, such as working for Uber. Additionally, customers are uncomfortable reporting informally earned income.  
*Recommendation: DLC should consider requiring additional information or a CBO interview prior to enrolling or recertifying \$0 income customers.*
  - **CAP Understanding:** DLC has found that customer understanding of CAP is lacking, and CBOs also reported some areas for improved education, such as the maximum bill credit and the recertification requirements.

Most customers join CAP in response to an immediate stressor, such as collections notices or unaffordable bills, so they focus on resolving the salient issue at the time of enrollment and don't fully understand the program.

DLC is working to implement a system where CBOs will follow up with customers to explain the full benefits offered by the program. This would tentatively involve at least one phone and one email attempt about 60 days from enrollment or reinstatement. This should further improve customer understanding of CAP, because at this time they should be out of crisis and better able to focus on the details of the program.

*Recommendation: DLC should implement such a process where they inform customers at enrollment about an upcoming educational call.*

- **Re-certification:** Most CAP defaults occur because customers do not recertify. However, many of these customers are reinstated less than a month later. This indicates that re-

certification is cumbersome and difficult to understand. This is especially the case for the senior population.

DLC is setting up to coordinate CAP re-certification with DHS. Initially, the CBOs will use the data from DHS for the re-certification. DLC estimates that these procedures will become fully system-automated in 2026 or 2027. Additionally, DLC is considering an auto-recertification process where seniors are only asked to confirm that there had been no change in their circumstances.

*Recommendation: DLC should implement these procedures as soon as possible to reduce the recertification burden and the number of customers who are removed from CAP and then return to the program following a delayed recertification.*

*Recommendation: DLC can also use texting to inform customers that they are due for recertification, and the customers can use a customer-specific link to take pictures of their documentation and send it to the CBO. Additional texts can be exchanged if information is missing from the recertification application.*

- **Recertification Confirmation:** CBOs report that the customer does not receive confirmation when their recertification is received. If the CAP amount changes, they are not aware of the change until they receive their next bill.

*Recommendation: Text and/or email the customer with confirmation and the updated monthly payment amount.*

- **CBO Administrative Burden:** DLC reports that the CBOs are highly customer-oriented and actively engaged in the community, often participating in community events. Most of the agencies have a strong understanding of CAP program requirements and the intake process. They excel at communicating with customers and connecting them to appropriate resources.

DLC reports, however, that they have limited visibility into the day-to-day operations of the CBOs. They do not have data on the number of calls received by the CBOs, so it is difficult for DLC to accurately evaluate the CBOs' workload.

The CBOs report that the budget for the agency services has not kept up with large increases in program workload. The workload has increased because of the required phone calls related to online applications, an increase in participation due to the increased ease of application, and a larger number of customers who must recertify every two years.

The agencies report that they also receive a large number of calls from customers with billing questions, including late payments, changes in payment amounts, and retaining CAP when they move. The 211 center frequently provides the agency phone number to those requesting help.

*Recommendation: DLC should develop methods to track CBO workload and timeliness of handling CAP applications and recertifications. The CBOs' workload should be*

*reduced if DLC implements some of the enhanced application and recertification recommendations noted above. However, DLC should assess whether more CBO resources are needed to meet the increased CAP participation.*

- CAP Payment: Agencies report that the ten percent CAP payment for electric heating customers above 100 percent of the Federal Poverty Level is difficult for customers to pay.

*Recommendation: The follow-up call that DLC is planning for CBOs to make 60 days after CAP enrollment should emphasize that CAP participants are eligible to apply for LIHEAP and aid with LIHEAP application and/or provide referral to CARES for assistance with the LIHEAP application.*

#### **D. CAP Participation and Impacts**

The CAP participant survey and the impact analysis showed that CAP participants are highly satisfied with the program and that it results in improved customer affordability and payment compliance.

- CAP Satisfaction: The survey found that 97 percent of CAP survey respondents felt that CAP was very or somewhat important in helping them to meet their needs and were very or somewhat satisfied with the program.
- CAP Impacts: The impact analysis found that CAP participants had significant improvements in their energy affordability, on-time bill payments, percent of bill paid, and reduced collections and disconnections.
- Payment Delinquency: Some CAP customers still do not pay their DLC bills. DLC reports that those who fall far behind on their payments and accrue high past due balances have a low chance of clearing their arrearages. They are working to capture customers that fall behind on payments before the balances get too high, especially in time for grant application season.  
*Recommendation: DLC should consider proactive outreach to customers who fall behind on their CAP payments.*

#### **E. Hardship Fund**

Duquesne Light has worked successfully with the Dollar Energy Fund (DEF) to provide emergency grants to payment-troubled customers. Recent additional funding has allowed the program to remain open later in the year. DEF reported the following accomplishments and challenges.

- Data Transfer: DLC has streamlined the process of providing information about the customer's account status, and LIHEAP and Crisis grants to DEF.
- Application Review: DLC's system reviews applications automatically for program qualifying criteria.

- **Online Application:** DLC is developing an online application that may be available in the fall and utilities are working on developing a common application. An online application would improve accessibility to the program. While customers can apply via phone and mail, income verification using that process can be too slow when there is a threat of termination.
- **Increased Funding:** DLC adapted to their increased funding by expanding eligibility and benefits. This was beneficial for the customers.
- **Agency Workload:** The one challenge that DEF reported was that CBOs have had a reduction in staffing since COVID which has made program administration more difficult.  
*Recommendation: Similar to the CAP agencies, we recommend that DLC assess whether hardship fund agencies are compensated sufficiently to provide responsive services to program applicants.*
- **Grant Amounts:** DEF reports that customers with electric service from DLC and gas heating from another utility can receive up to \$600 for each utility. However, DLC electric heating customers can only receive up to \$600 in total.  
*Recommendation: DLC should consider whether grant amounts should be higher for electric heating customers.*
- **Third Party Assistance:** DEF reports that over 50 organizations make regular pledges to cover customer payments and the system is difficult to manage.  
*Recommendation: DLC should work with DEF to develop a system to efficiently manage these grants.*

## F. CARES

Duquesne Light's Customer Assistance Referral and Evaluation Services (CARES) program helps payment-troubled and special needs customers to obtain additional assistance. DEF reported that they provide holistic services to CARES customers and make extensive efforts to reach customers with home visits when needed and assist them with the challenges that they face. CARES provides another layer of assistance for vulnerable customers who are sometimes overwhelmed.

- **CARES Referrals:** DLC reported that one challenge with the program is training Contact Center Representatives on when to refer customers to CARES. They found that at times there were over referrals to the program and that more training for the representatives could be helpful. They said that the representatives need to ask customers.
  - Do you use medical equipment?
  - Do you have a computer and can you enroll by e-mail?
  - Can you see or read documents if mailed to you?*Recommendation: DLC should provide additional training on CARES to their Contact Center Representatives.*

- **Holistic Service Delivery:** DLC has indicated that they aim to provide more holistic services to low-income customers. Since CARES is a referral program, it could serve as the primary vehicle for implementing this more holistic approach. DLC should reconsider when customers should be referred. For example, customers who have missed CAP payments and have not received LIHEAP or other grant assistance, may be a good target for CARES services.  
*Recommendation: Reconsider how to target CARES and how it can be used as part of a holistic approach to serving low-income customers.*

## **G. Smart Comfort**

Smart Comfort is a well-designed and implemented program. Energy savings have improved over the past several years and the program has incorporated beneficial initiatives such as the heat pump and home repairs pilots. We have the following findings and recommendations for this program.

- **Holistic Approach:** Duquesne Light is working to restructure Act 129, Smart Comfort, and other Universal Services Programs and Energy Efficiency programs to take a deeper community-centered approach. As part of this effort, they hope to work with a LIURP partner that requires less oversight, so that they can encourage small community organizations and small women, veteran, disabled, and minority-owned businesses to participate. DLC wants to partner with organizations who can provide one-stop shopping for all needed services, such as gas, water, food, and mental illness.  
*Recommendation: We agree that this approach has the potential to better serve DLC customers with assistance that is more targeted and beneficial for the individual customer's needs. However, we recommend that DLC partner with a prime contractor that has experience training and managing these smaller organizations to ensure that customers continue to receive comprehensive and high-quality energy efficiency services.*
- **LIURP Compensation:** DLC reported that CLEAResult focuses more on their Smart Comfort work because the program provides an audit fee whereas Act 129 only pays for the measures installed. DLC should assess the compensation structure for Smart Comfort and Act 129 with the goal of providing equivalent compensation for both programs and compensating contractors in a way that provides incentives for the most comprehensive and cost-effective service delivery.  
*Recommendation: A fixed fee for each job or hours spent at the home (with a minor markup on materials) that is the same for both programs may better incentivize contractors to serve customers with the most appropriate program and measures.*
- **Customer Targeting:** DLC reports that a key challenge is the lack of electric heating and water heating jobs in the service territory, which makes it difficult to reach the ten percent goal for these jobs.  
*Recommendation: DLC should initiate a special referral process for the agencies when reviewing CAP applications from electrically-heated customers to ensure that these customers are targeted for LIURP services.*

- Landlord Consent: Both DLC and CLEAResult stated that landlord consent was a major obstacle to completing comprehensive jobs.  
*Recommendation: DLC should consider providing landlord outreach and education to increase acceptance of the program.*
- Coordination: Coordination with WAP was a challenge because the WAP agencies had extra funding through IRA programs.  
*Recommendation: Now that agency funding has declined, there will be greater opportunities for WAP coordination, and DLC should prioritize these efforts.*

There are also significant benefits to coordinating jobs with the gas utilities. DLC reported that this coordination has become more difficult as CLEAResult lost those gas LIURP contracts.

*Recommendation: DLC should consider the ability of contractors to perform the gas utility work as a factor in their LIURP vendor procurement, as this coordination is an important benefit for the program.*

- Refrigerators and Freezers: ENERGY STAR certified refrigerators are provided in exchange for old units when the customer's appliance is at least five years old, or between three and five years old and severely malfunctioning. If the customer is a renter, the landlord must approve the replacement. The program also replaces freezers that are at least seven years old, dehumidifiers, and air conditioning units that are at least seven to ten years old during summer months.  
*Recommendation: The program should consider metering the equipment to determine if replacement is warranted.*
- Heat Pumps: The heat pump pilot is achieving high savings.  
*Recommendation: DLC should continue and expand this pilot if possible. Additional research should assess the cost-effectiveness of this work and the impact on participants' energy bills.*
- Health & Safety: Act 129 jobs do not receive carbon monoxide and smoke detectors.  
*Recommendation: DLC should use LIURP funding to support carbon monoxide and smoke detectors in Act 129 jobs, as these measures are not funded by Act 129, but are important health and safety measures for all customers.*
- Education: Education is an important aspect of Smart Comfort.  
*Recommendation: DLC should enhance the educational aspect of the Smart Comfort program, with additional customer-facing materials on their website and make these materials available for distribution to customers at the audits.*
- Energy Savings: The 2023 LIURP impact analysis found that the electrically heated jobs had lower savings than the baseload jobs.  
*Recommendation: Additional research should be conducted to assess the reasons for the lower savings on these jobs and how performance can be improved.*

- Evaluation: Additional analysis of Smart Comfort could provide more insight and lead to higher program savings.  
*DLC should consider a more comprehensive evaluation of their Smart Comfort program, as the Universal Services Program Evaluation is structured to focus on CAP. This evaluation would assess energy savings over several years, measure installation rates, and provide a detailed benchmarking against other LIURP programs in PA and other low-income energy efficiency programs around the country.*