

COMMONWEALTH OF PENNSYLVANIA



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November 4, 2025

Via Electronic Filing

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

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

OCA Letter in Lieu of Answer in Support of CAUSE-PA/TURN Answer

Dear Secretary Homsher,

On September 17, 2025, PECO Energy Company (PECO) filed an amended Universal Service and Energy Conservation Plan (Proposed Amended 2019 USECP) in order to reflect: (1) “certain guidance in the Commission’s September 9, 2024 letter concerning PECO’s participation in the Department of Human Services’ (“DHS”) Low-Income Home Energy Assistance Program (“LIHEAP”) data sharing program;” (2) “changes related to the final Commission orders in PECO’s recent electric and gas base rate proceedings (Docket Nos. R-2024-3046931 and R-2024-3046932, respectively);” and (3) “certain additional clarifying changes and updates.” Proposed Amended 2019 USECP Cover Letter at 1.¹

On September 29, 2025, the Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a joint letter (TURN/CAUSE-PA Answer)² opposing the proposed changes to the data sharing process in PECO’s Proposed Amended 2019 USECP. The TURN/CAUSE-PA Answer specifically raised concerns related to how PECO was planning to implement the LIHEAP data sharing with

¹ The Commission through its Secretarial Letter on October 28, 2025 administratively converted the Proposed Amended 2019 USECP into a Petition.

² The Secretarial Letter also administratively converted the TURN/CAUSE-PA letter into an Answer.

the Department of Human Services (DHS). PECO's Proposed Amended 2019 USECP included language that would require that the CAP eligible customer also submit a separate CAP application contrary to the language of the Commission's directive in its *June 2024 Order*.

As the TURN/CAUSE-PA Answer provided, the *June 2024 Order* encouraged utilities to participate in data sharing with DHS's LIHEAP.³ In the Order, the Commission provided that the utilities participating in the data sharing program should use a "simplified/streamlined process for households to enroll in universal service programs and recertify in CAP if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, without requiring additional applications or documentation."⁴

The TURN/CAUSE-PA Answer further provided:

TURN and CAUSE-PA agree with the Commission's directive in its June 2024 Order, reiterated in its September 2024 Secretarial Letter, that households whose information is shared by DHS should be permitted to enroll in CAP without the need for an additional application.

TURN/CAUSE-PA Answer at 3. TURN and CAUSE-PA requested that the Commission reject the Proposed Amended 2019 USECP to the extent that "it requires LIHEAP recipients who have consented to data sharing to complete a CAP application prior to enrollment" and also required that the Commission "direct PECO to further amend its USECP to remove any requirement for a CAP application for this subset of customers." TURN/CAUSE-PA Answer at 3.

On October 28, 2025, the Commission issued its Secretarial Letter notifying PECO and other interested stakeholders that interested parties could respond to the concerns raised by the TURN/CAUSE-PA Answer. Secretarial Letter at 2.

In accordance with the Secretarial Letter, the OCA provides this Letter in Lieu of Answer in support of the TURN/CAUSE-PA Answer. The OCA agrees with the concerns set forth in CAUSE-PA and TURN's Answer regarding PECO's proposed requirement that CAP enrollees who have consented to LIHEAP data sharing also submit a separate CAP application. Moreover, as noted by the TURN/CAUSE-PA Answer, elimination of a requirement for an additional application is consistent with the Commission's *June 24 Order* and *September 2024 Secretarial Letter*. The purpose of the LIHEAP data sharing agreement with DHS is to remove administrative barriers to enrollment in CAP. PECO's proposed requirement that customers enrolling in CAP should also have to submit a separate CAP application would add back into the process the very barrier to enrollment that the data sharing agreement was designed to eliminate. The OCA supports the recommendation of TURN/CAUSE-PA that households whose information is shared by DHS should be permitted to enroll in CAP without the need for an additional CAP application.

³ 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Docket No. M-2023-3038944, Order at 3 (June 13, 2024)(*June 2024 Order*).

⁴ *Id.*

Respectfully Submitted,

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Certificate of Service

CERTIFICATE OF SERVICE

PECO Energy Company Universal Service	:	
and Energy Conservation Plan for 2019-2024	:	Docket No. M-2018-3005795
Submitted in Compliance with 52 Pa. Code §	:	
§ 54.74 and 62.4.	:	
	:	
Petition of PECO Energy Company to amend	:	
its Amended Proposed 2019-2024 Universal	:	Docket No. P-2020-3020727
Service and Energy Conservation Plan – filed	:	
July 8, 2020	:	
	:	
Petition of PECO Energy Company to amend	:	
its Amended Proposed 2019-2024 Universal	:	Docket No. P-2020-3022154
Service and Energy Conservation Plan – filed	:	
September 25, 2020	:	

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter Re: In Lieu of Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 4th day of November 2025.

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Dated: November 4, 2025