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November 7, 2025

VIA ELECTRONIC FILING

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

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

Dear Secretary Homsher:

On July 31, 2024, PECO Energy Company (“PECO” the “Company”) submitted a letter indicating its intent to participate in the Department of Human Services’ (“DHS”) Low-Income Home Energy Assistance Program (“LIHEAP”) data sharing and affirming that the Company would “[u]se a simplified/streamlined process for households to enroll in universal service programs and recertify in PECO’s Customer Assistance Program (“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.” PECO also submitted a redline of the Company’s 2019-2028 Universal Service and Energy Conservation Plan (“USECP”) reflecting proposed changes to implement data sharing, including revisions to PECO’s CAP application. The redline showed that PECO was retaining the requirement to submit a CAP application, but had streamlined the application for data sharing participants by removing the requirement that such customers provide income documentation.

On September 9, 2024, Commission Staff issued a letter confirming that no protests or responsive pleadings were submitted in response to PECO’s filing and also providing guidance concerning USECP changes to implement data sharing. The guidance included the following:

PECO is encouraged to eliminate the requirement for customers to complete a separate CAP application if the household’s information is already verified through the LIHEAP household data provided by DHS. Households whose information is shared by DHS should be permitted to enroll in CAP with informed consent, without completing an application or providing additional documentation after giving the public utility informed consent.



On September 17, 2025, PECO submitted an updated USECP to reflect, among other things, certain guidance from the Commission’s September 9, 2024 letter. The updated USECP continued PECO’s streamlined CAP application process for data sharing participants, but further highlighted instructions to applicants in a separate paragraph on page 1 of the revised PECO CAP application: “**PLEASE NOTE:** If you selected PECO to receive a LIHEAP Grant and checked the box for authorizing DHS to share your income with your utility, please indicate ‘LIHEAP Data Sharing’ below under ‘Source of Income’ and do not attach proof of income.”

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 letter objecting to the USECP’s streamlined CAP application process and requesting that the Commission require PECO to eliminate use of a CAP application for data sharing participants.¹ TURN and CAUSE-PA contend that requiring this subset of customers to submit a CAP application is inconsistent with the above-quoted language in the September 9, 2024 Secretarial Letter and also inconsistent with the Company’s statement that PECO would “[u]se a simplified/streamlined process . . . without requiring additional applications or documentation.” On November 4, 2025, the Office of Consumer Advocate (“OCA”) filed a letter in support of the TURN/CAUSE-PA Answer.

PECO disagrees that a rejection of the Company’s updated USECP is warranted. While the Commission “encouraged” PECO to eliminate the use of a CAP application for data sharing participants in the September 2024 letter, the Commission also explained that data sharing participant enrollment should occur “*after giving the public utility informed consent.*” (emphasis added). A customer’s submission of a CAP application is the means by which PECO obtains customer consent to enroll in CAP. To eliminate the CAP application process entirely for data sharing participants, as TURN, CAUSE-PA and OCA recommend, would remove PECO’s process for obtaining customer consent. PECO urges the Commission to approve the updated USECP submitted on September 17, 2025, including the streamlined CAP application process for data sharing participants.

¹ By Secretarial Letter issued October 28, 2025, the Commission deemed PECO’s September 17, 2025 filing to be a Petition to amend the Company’s 2019-2028 USECP and TURN/CAUSE-PA’s September 29, 2025 filing to be an Answer to PECO’s Petition. The Commission also provided that PECO and other stakeholders could submit a response to the TURN/CAUSE-PA Answer within 10 days of the Secretarial Letter (November 7, 2025).



If you have any questions or concerns, please feel free to contact me directly at 856-912-4738.

Very truly yours,

A handwritten signature in blue ink that reads "Jack R. Garfinkle". The signature is written in a cursive style.

Jack R. Garfinkle

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO ENERGY COMPANY'S 2019-2028 :
UNIVERSAL SERVICE AND ENERGY : **Docket No. M-2018-3005795**
CONSERVATION PLAN :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the foregoing **Letter on behalf of PECO Energy Company** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: November 7, 2025

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