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August 28, 2026

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

Re: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56, Docket No. L-2025-3058767

Dear Secretary Homsher:

Enclosed for filing please find the comments of the Energy Association of Pennsylvania to the Commission's February 19, 2026 Notice of Proposed Rulemaking Order ("NOPR") at the above-referenced docket.

Sincerely,

Russell Bedell
Director, Regulatory Strategy

Enclosure

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56	:	Docket No. L-2025-3058767

COMMENTS OF THE
ENERGY ASSOCIATION OF PENNSYLVANIA
TO FEBRUARY 19, 2026 NOTICE OF PROPOSED RULEMAKING ORDER

I. INTRODUCTION

The Energy Association of Pennsylvania ("EAP" or "Association")[1] is a trade association representing Pennsylvania's regulated electric and natural gas distribution utilities. EAP respectfully submits these comments on behalf of its electric distribution company ("EDC") and natural gas distribution company ("NGDC") members in response to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") February 19, 2026 Notice of Proposed Rulemaking Order to Further Amend the Provisions of 52 Pa. Code Chapter 56, Docket No. L-2025-3058767 ("NOPR Order"), which seeks to incorporate the provisions of the former Chapter 14 of the Public Utility Code into the Chapter 56 regulations.

The former Chapter 14 (66 Pa.C.S. §§ 1401-1419) expired on December 31, 2024 due to a sunset provision. As the Commission correctly notes, this statutory framework was vital in eliminating opportunities for customers capable of paying public utility bills to avoid timely payment and providing utilities with essential tools to reduce uncollectible accounts. EAP

[1] EAP members include: Citizens' Electric Company; Columbia Gas of Pennsylvania, Inc.; Duquesne Light Company; FirstEnergy Pennsylvania Electric Company; Leatherstocking Gas Company, LLC; National Fuel Gas Distribution Corp.; Pike County Light & Power Company; PECO Energy Company; Peoples Natural Gas Company LLC; Philadelphia Gas Works; PPL Electric Utilities Corporation; UGI Utilities, Inc.; Valley Energy, Inc.; and Wellsboro Electric Company.

supports the Commission's initiative to provide regulatory certainty by codifying these long-standing provisions within the Pennsylvania Code.

On December 12, 2024, the Commission issued a Statement of Policy to clarify that even with the sunsetting of Chapter 14, its regulations codified at 52 Pa. Code Chapter 56 that govern the existing procedures by which residential utility service may be terminated by the applicable jurisdictional utilities will remain in effect until amended and that it will continue its obligations under the Code to ensure that utility rates and tariffs are just and reasonable. With this guidance, EAP members have continued to abide by the Chapter 14 regulations.

Regarding the NOPR Order, Chairman Stephen DeFrank observes, "This proposed rulemaking reflects the Commission's responsibility to provide stability during a period of real uncertainty for many households. By moving these longstanding consumer protections into regulation, we are creating a clear, predictable framework that helps keep essential utility service accessible and affordable, while also giving utilities the certainty they need to plan, operate, and serve customers effectively."

II. COMMENTS

At the outset, EAP strongly concurs with the Commission's statements that this rulemaking "is not intended as a general review of Chapter 56 of the Commission's regulations" but is intended to expeditiously amend the Chapter 56 regulations and provide prompt regulatory certainty in light of the expiration of Chapter 14 of the Code.

Maintaining the integrity of the collections process is paramount to minimizing costs for the remainder of the residential rate base. Broadening this proceeding to alter existing, settled protections would only serve to potentially grow residential arrearages, increase administrative burdens, create greater regulatory uncertainty, and weaken utilities' ability to collect. EAP agrees that the necessity of this narrow rulemaking to provide administrative clarity with Chapter 14's sunset does not implicate changes to other, settled portions of the collections process governed by the Chapter 56 regulations that were promulgated with several opportunities for public and stakeholder input at the time Chapter 14 was last revised.

EAP defers to its member companies regarding specific financial or economic impacts if these proposed regulations are not adopted, and EAP members may offer their own comments on related issues. The Association recognizes that other commenters may be seeking modifications regarding specific provisions that have been proposed to be incorporated, and EAP will address these comments in its reply.

EAP maintains that keeping the conditions of Chapter 14 intact is the optimal path forward. The Commission should continue with the goal of comprehensively balancing the interest of all customers, and utilities should have the flexibility to likewise recover costs accordingly. EAP notes that the Commission has opted to include a proposal for the adjustment of Section 56.225 to incorporate the prohibition against surcharges for uncollectible expenses previously included in statutory provisions of Section 1408 of the code. To the extent that this rulemaking results in significant changes to the balance incorporated in the Chapter 14 framework that would result in increased future arrearages, EAP recommends that the Commission remove this prohibition from the regulation to allow optimal flexibility in considering due rate mechanisms.

We generally observe that the limited action in the Commission's proposal serves to protect ratepayers by ensuring that those capable of paying do so in a timely manner. Regarding that action, EAP supports the proposal to modify Section 56.2 to incorporate the definitions of "change in income" and "significant change in circumstances" as they appeared in the former statute. Furthermore, the Association supports the creation of Section 56.182 to codify the payment arrangement procedures formerly found in Section 1405(a)-(e). These provisions have provided a predictable and evenhanded framework for over 20 years, and their reinstatement in regulation is the most effective way to mitigate unnecessary expenses for the public and the utilities alike.

III. CONCLUSION

EAP encourages the Commission to continue striving toward an optimum balance between protecting vulnerable customers and ensuring that those capable of paying do so in a timely manner. By expeditiously reinstating the Chapter 14 provisions in regulation without opening the door to broader, potentially destabilizing changes, the Commission serves the public interest and ensures the continued provision of safe and reliable service at reasonable rates.

Respectfully submitted,

Russell Bedell
Director, Regulatory Strategy

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Date: August 28, 2026