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Via Electronic Filing
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

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

Dear Secretary Homsher:

The Commission on Economic Opportunity is submitting these comments in response to the PUC's Notice of Proposed Rulemaking Order to Amend Chapter 56 of the Commission's regulations. Those regulations involve billing and collections practices, payment arrangements and terminations for residential customers.

The Commission on Economic Opportunity (CEO) is a community action agency located in and serving low-income households in Luzerne County. CEO has a long history of being involved in Commission proceedings and becomes involved to ensure that low-income households' utility costs are contained through counseling, payment assistance and conservation programs. CEO administers numerous universal service programs on behalf of electric and gas distribution companies that serve its area. Those programs include customer assistance and hardship programs. Due to its historical administration of universal service programs, and other non-utility assistance programs, CEO understands the issues facing low-income households in its service territory.

Over the last decade, and especially more recently, CEO has seen the economic challenges faced by low-income households become greater through increases in housing and utility costs. These comments are being submitted because CEO believes that the need to protect our most vulnerable citizens is greater now than it has been and that protections must be in place to ensure affordable utility costs and to prevent interruptions in service.

CEO agrees with Vice Chair Barrow when she set forth the following in her February 19, 2026 Statement:

Ignoring lessons learned in the past 10-20 years Chapter 14 had been in place and ignoring the current landscape of affordability and vulnerability faced by Pennsylvania customers today does *not achieve this mission. Simply copying and pasting the prior Chapter 14 into our regulations is not in the public interest, and is frankly a disservice.*

Based upon the above, CEO is recommending the following additional protections:

1. Payment Arrangements: Payment arrangements that fail to consider completely the affordability of those payments are more likely not to be met and result in the termination of service. Utilities should be required to offer a more affordable payment plans that take into account household composition and the percentage of income that goes towards payments; that is, payment arrangements should consider whether members of the household are elderly, disabled, young children or are facing serious medical issues.

Payment arrangements should also be flexible to account for hardships and by recognizing the impacts of economic hardship on a low-income consumer. A change in economic circumstances can be devastating to a low-income family with many essential needs being at risk-utility service, food, medical care and housing. Greater discretion should be allowed that recognize the type and impact of the hardship and the amount of time it takes for a low-income family to recover from that hardship. CEO recommends that existing arrangements be extended beyond the current six-month hardship extension period.

2. Moratoriums: In this time of climate change and increasing temperatures, a person is now at greater risk during summer months than previously. That risk increases should the person be without utility service. Accordingly, there should be a summer moratorium that precludes termination during the hotter months of the year.

In conclusion and as a general matter, CEO is recommending that the Commission take this opportunity to address more fully issues of affordability and continuation of reliable utility service for Pennsylvania's most vulnerable citizens by providing greater protections for those citizens in addressing Chapter 56. CEO looks forward to further addressing such measures as this proceeding progresses.

Respectfully,

Joseph L. Vullo