

August 28, 2026

VIA E-FILE

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

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

Recommendations of the Joint Commenters for Utility Access

The undersigned elected officials, agencies, organizations, and associations (collectively, the Joint Commenters for Utility Access) submit the following comments in response to the Public Utility Commission's Notice of Proposed Rulemaking Order to amend Chapter 56 of the Commission's regulations, which govern utility billing, collections, and terminations for residential customers.

At the end of 2024, the former law governing utility billing, collections, and terminations – known as Chapter 14 – sunset. While intended to penalize *willful* bad actors, Chapter 14 had the unintended consequence of punishing economically vulnerable customers unable to keep up with rising utility costs, contributing to increased involuntary termination rates *without any corresponding improvement in collections*.¹ Since implementation of Chapter 14, termination rates for low income households have increased dramatically, and have remained high ever since. Last year, over 400,000 Pennsylvania families had their gas, electricity, or water shut off last year – setting yet another new record for involuntary terminations.²

The sunset of Chapter 14 gives the Commission an opportunity to meaningfully improve access to safe, affordable utility service for all. We urge the Commission to reform the collections paradigm, emphasizing prevention over punishment in its amendments to Chapter 56. As Vice Chair Barrow noted in her February 19, 2026 Statement:

[The Commission] must balance the needs of consumers and utilities; ensure safe and reliable utility service at reasonable rates; and protect the public interest.

¹ Since Chapter 14 was passed in 2004, the write-off ratio remained relatively stagnant for electric utilities and actually increased for gas utilities. See Pa. PUC, Universal Service and Collections Reports, <https://www.puc.pa.gov/filing-resources/reports/universal-service-programs-and-collections-performance-reports/>.

² Pa. PUC, Residential Collection Data (June 2026), https://www.puc.pa.gov/media/3972/residential_collections_data-2025v2.pdf.

Unfortunately, the Commission's proposed amendments to Chapter 56 fall far short of achieving those goals. We urge the Commission to incorporate the following additional reforms:

(1) Establish Prevention-Based Payment Arrangement Standards

Chapter 14 placed unreasonable restrictions on payment arrangements, compounding debt, increasing termination rates, and increasing uncollectible expenses. Rather than codify those expired limitations, the Commission should exercise its authority to ensure arrangements are reasonable and affordable based on a household's realistic ability to pay.

We recommend the Commission:

- *Limit monthly installments to no more than 20% of a household's average bill over the prior 12 months.* Unaffordable arrangements are more likely to be broken, resulting in service termination and unsafe conditions for families while utilities go unpaid. Establishing a maximum monthly threshold for installments will help ensure households have a reasonable chance to catch up.
- *Require utilities to offer more affordable arrangements.* Setting a minimum standard for utility-issued payment arrangement length will help ensure consistency across companies and a baseline of reasonableness for customers.
- *Restore Commission discretion to modify an existing arrangement or grant additional arrangements based on individual circumstances.* The proposed six-month extension for significant hardship is inadequate to account for real life circumstances, particularly for low and fixed income households. Even a small change in circumstances can pose a substantial hardship for seniors waiting on their next Social Security payment or working families living paycheck to paycheck.
- *Allow low income customers enrolled in a utility-run Customer Assistance Program (CAP) to access a payment arrangement if they fall behind.* CAP enrollment does not guarantee consistently affordable bills, and CAP households often face compounding hardships for which a payment arrangement may be essential to maintaining service.
- *Require utilities to screen for CAP eligibility before issuing a payment arrangement.* Before entering a payment arrangement, utilities should be required to screen for eligibility in the utility's universal service programs. While Chapter 56 contains a referral requirement, this has proven insufficient to ensure low income customers are first enrolled in an available arrearage management, rate relief, or efficiency program.

(2) Improve Protections for Medically Vulnerable Households

Medical certificates provide critically important protections for vulnerable households, primarily seniors and individuals with disabilities. However, the process is cumbersome and confusing, and reforms are needed.

We recommend the Commission:

- *Restore the former 7-day grace period to obtain a medical certificate.*
- *Extend standard medical certificate coverage from 30 to 90 days.*
- *Create a 6-month "chronic illness" certification, allowing consumers with a chronic, long-term illness to obtain a longer period of protection.*
- *Allow registered nurses, who are often more closely involved in direct patient care and implementation of treatment plans, to sign medical certificates.*

(3) Keep Pennsylvanians Connected to Utility Service in the Hottest and Coldest Months

We strongly support adding a *calendar-based summer moratorium* as part of this proceeding, preventing involuntary termination of low and moderate income households during the hottest summer months. Just as the winter moratorium avoids preventable deaths and other health consequences from lack of home heating during the coldest months, a summer moratorium — structured on a date basis like its winter counterpart, given the wide week-to-week fluctuation in temperatures — could similarly prevent heat-related deaths and other costly health consequences caused by exposure to extreme heat.³

(4) Eliminate Unnecessary and Punitive Fees

The Commission should eliminate or waive punitive fees and deposits for low and moderate income households, as they increase arrearages and create barriers to maintaining essential service without any evidence of improved outcomes. We recommend the Commission:

- *Eliminate cash deposits as a condition for establishing or continuing service, or at minimum limit such charges to households above 300% FPL, since deposits are punitive, pose an unreasonable barrier to life-sustaining service for vulnerable populations, exacerbate economic insecurity, and show no evidence of improving bill payment.*
- *Eliminate punitive reconnection and late fees for low and moderate income households (at or below 300% FPL) that compound debt.* Reconnection and late fees compound the

³ Lusson, K. (2026, July 7). *Protecting Access to Essential Utility Service During Extreme Heat and Climate Change* (Updated ed.). [National Consumer Law Center \(NCLC\)](https://www.nclc.org/resources/protecting-access-to-essential-utility-service/). <https://www.nclc.org/resources/protecting-access-to-essential-utility-service/>

barriers to restoring and maintaining life-sustaining service for low and moderate income households.

(5) Expand Protections for Survivors of Domestic Violence

Chapter 14 exempted survivors of domestic violence from its provisions, helping ensure that utility debts accrued by a third party don't prevent a survivor from establishing a safe home. While the Commission proposes to retain these protections without reference to Chapter 14, the underlying eligibility requirements are unduly restrictive and difficult for utilities to implement – requiring utilities to interpret court documents to determine whether a customer has experienced interpersonal violence. Seeking formal court protection can endanger a survivor's life and livelihood, and should no longer be required as a condition to receiving critical protections necessary for a survivor to establish a safe and healthy home.

We recommend the Commission adopt the simplified certification process utilized by the Pennsylvania Unemployment Compensation Board, pursuant to Act 55 of 2025, allowing survivors of domestic violence to certify their status.⁴

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As Vice Chair Barrow declared in her February 19 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.

Pennsylvanians cannot afford a regulatory framework that accepts record terminations as an inevitable consequence of rising utility costs. The Commission should seize this opportunity to strengthen Chapter 56 with practical, evidence-based protections that prevent shutoffs before they occur, and ensure that safe, affordable utility service remains accessible to all households.

We thank the Commission for the opportunity to speak to these critical issues and look forward to staying engaged in this discussion over the coming months.

Respectfully,

The Joint Commenters for Utility Access

⁴ Act 55, P.L. 333. Amending the Unemployment Compensation Law, 43 P.S. § 751 et seq. (specifically adding provisions related to domestic violence eligibility under Section 402.7). Act 55 specifically established an expedited “express lane” framework for unemployment compensation claimants experiencing domestic violence.

Elected Officials

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Pennsylvania State Senator, 4th District
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The Honorable Nikil Saval

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The Honorable Lindsey M. Williams

Pennsylvania State Senator, 38th District
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The Honorable Danilo Burgos

Pennsylvania State Representative, 197th District
Majority Chair, Pennsylvania House Consumer
Protection, Technology, and Utilities Committee

The Honorable Elizabeth Fiedler

Pennsylvania State Representative, 184th District
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The Honorable Rick Krajewski

Pennsylvania State Representative, 188th District
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