

Michael J. Shafer
Senior Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.2599 Fax 610.774.4102
MJShafer@pplweb.com



E-File

February 15, 2024

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

**Re: Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1 – 58.18
Docket No. L-2016-2557886**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation (“PPL Electric”) are PPL Electric’s Reply Comments in the above-captioned proceeding. These Reply Comments are being filed pursuant to the May 18, 2023 Secretarial Letter issued in this matter and notice published in the December 2, 2023 *Pennsylvania Bulletin*.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on February 15, 2024, which is the date it was filed electronically using the Commission’s E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Michael J. Shafer

Enclosure

cc via email: Certificate of Service
Louise Fink Smith
Erin Tate
RA-PCLAW-LIURP@pa.gov

Regina Carter
Karen Thorne
Joseph Magee
ra-pcpcreview@pa.gov

CERTIFICATE OF SERVICE

(Docket No. L-2016-2557886)

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

Patrick Cicero, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
ra-oca@paoca.org

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Allison Kaster
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
akaster@pa.gov

Date: February 15, 2024



Michael J. Shafer

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Initiative to Review and Revise the :
Existing Low-Income Usage Reduction : Docket No. L-2016-2557886
Program (LIURP) Regulations at :
52 Pa. Code §§ 58.1 – 58.18 :

**REPLY COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

I. INTRODUCTION

On December 16, 2016, the Pennsylvania Public Utility Commission (“Commission”) issued a Secretarial Letter announcing its intent to conduct a rulemaking to modify the existing Low-Income Usage Reduction Program (“LIURP”) regulations at 52 Pa. Code §§ 58.1-58.18. In the Secretarial Letter, the Commission identified a number of topics relating to LIURP and posed 14 questions to which the Commission solicited responses from interested stakeholders. The Secretarial Letter directed interested parties to submit their responses within 30 days of the date that the Secretarial Letter was published in the *Pennsylvania Bulletin*, and provided that reply responses were due 30 thereafter.¹ The Commission would consider the responses from the stakeholders in determining the scope of the future rulemaking. Several interested parties, including PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed Comments and Reply Comments in response to the Secretarial Letter.

On May 18, 2023, the Commission issued its Notice of Proposed Rulemaking (“NOPR”) setting forth proposed amendments to its LIURP regulations at 52 Pa. Code §§ 58.1-58.18. The

¹ The Secretarial Letter was published in the *Pennsylvania Bulletin* on December 31, 2016. Accordingly, initial responses to the Secretarial Letter were due by January 30, 2017, and reply responses were due by March 1, 2017.

NOPR directed interested parties to file Comments within 45 days following publication in the *Pennsylvania Bulletin* and Reply Comments within 30 days following the due date for Comments. After the Commission received a tolling memorandum from the Office of Attorney General on September 29, 2023, the NOPR was published in the *Pennsylvania Bulletin* on December 2, 2023. Accordingly, Comments were due by January 16, 2024, and Reply Comments are due by February 15, 2024.

On January 16, 2024, PPL Electric and other interested parties filed Comments on the NOPR.

PPL Electric respectfully submits these Reply Comments in response to some of the other parties' Comments. Although the Company does not respond to every concern or recommendation set forth in the other parties' Comments, PPL Electric's failure to respond should not be interpreted as the Company's agreement with those concerns or recommendations.

I. PPL ELECTRIC'S REPLY COMMENTS

A. SECTION 58.2. DEFINITIONS

For Section 58.2 of the Commission's regulations, the Commission proposes "updat[ing] the existing definitions in the LIURP regulations with current terminology, incorporat[ing] definitions used in 52 Pa. Code §§ 54.72, 56.2, 62.2, and 69.262, and add[ing] definitions applicable to LIURP as a universal service program." NOPR, pp. 17-18.

The Office of Consumer Advocate ("OCA") "proposes that the Commission modify the proposed definition to increase the income limits for 'a low-income customer' from 150% to 200%" of the Federal Poverty Income Guidelines ("FPIG"). (OCA Comments, pp. 10-14.) The OCA also proposes that the Commission "increas[e] the income qualifications for a special needs customer from 200% to 300% of the FPIG." (OCA Comments, pp. 14-16.)

PPL Electric strongly disagrees with the OCA's proposals. Increasing these FPIG limits would drastically increase the number of customers who qualify for LIURP. Such an increase in eligible customers would result in either: (1) fewer LIURP jobs for low-income customers with income at 150% FPIG or below and special needs customers with income at 200% FPIG or below; or (2) substantial increases in LIURP budgets to accommodate the large additions of eligible customers. From the Company's perspective, either scenario is unacceptable. The former results in LIURP dollars not being available for the customers who are in most financial distress, while the latter produces substantial increases in the LIURP budgets, the costs of which are passed onto and recovered from residential customers.

In addition, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") suggests that the Commission modify its proposed definition for "de facto heating" by defining that term as the "[u]se of an alternative heating source as the primary heating source when the primary or central heating system is inadequate, non-functioning, or public utility service has been terminated." (CAUSE-PA Comments, pp. 18-20) (proposed modifications in underline).

PPL Electric disagrees with CAUSE-PA's addition of "inadequate" to the proposed definition of "de facto heating." The term "inadequate" is vague and open for several different interpretations. CAUSE-PA's Comments also appear to focus on the inadequacy of a heating system to keep a "home at a safe temperature" or "*inadequate* to heat the home." (CAUSE-PA Comments, pp. 18, 20) (emphasis in original). However, what is "inadequate" to one person or entity may be adequate to another. Additionally, as written, CAUSE-PA's proposed definition is an incomplete sentence, which could lead to further issues with how the term is interpreted.

Further, CAUSE-PA suggests that the Commission change its proposed definition of “ESP – Energy service provider” to a “community-based organization, contractor, subcontractor, or public utility representative responsible for providing program services on behalf of a public utility.” (CAUSE-PA Comments, pp. 21-22) (proposed modification in underline).

PPL Electric disagrees with this proposal. CAUSE-PA attempts to support its proposal by claiming that the Commission’s proposed definition is too narrow and “is not appropriately inclusive of Community Based Organizations (CBOs).” (CAUSE-PA Comments, p. 21.) However, the proposed modifications make the definition narrower and could prevent non-community-based organizations from being considered energy service providers (“ESPs”). If the Commission’s goal is to provide LIURP benefits to as many eligible customers as possible in a cost-effective manner and within budget, then the definition of ESPs should not be unreasonably narrow.

B. SECTION 58.4. PROGRAM FUNDING

The Commission proposes to retitle the section as “LIURP budgets” and to clarify that “a LIURP budget can only be revised through a USECP proceeding initiated pursuant to the periodic USECP review process or in response to a petition to amend a USECP earlier than the periodic USECP review process.” NOPR, p. 36. The Commission incorporated that clarification in its proposed revisions to subsection (c) of Section 58.4. *See* NOPR Annex A, pp. 7-8. Also, the new subsection (a.2) of Section 58.4 “sets a maximum annual LIURP budget allowance for special needs customers,” and the revised subsection (c) provides “the factors and expenses that must first be considered to revise a LIURP budget.” NOPR, p. 36; *see* NOPR Annex A, pp. 7-8. Further, the new subsection (d.1) of the regulation “establishes provisions for unspent LIURP funds at the end of a program year and the mechanism for recovering LIURP costs” and updates terms to be consistent with the proposed definitions in Section 58.2. NOPR, p. 36; *see* NOPR Annex A, p. 8.

The Commission also proposes changes to subsection (e) of the regulation concerning the recovery of LIURP costs to, among other things, “specif[y] that LIURP costs are allocated among ratepayers” and “clarify that the LIURP funding mechanism for recovery of LIURP costs must be determined in a public utility’s rate proceeding.” NOPR, p. 40; *see* NOPR Annex A, p. 9.

CAUSE-PA proposes that the Commission “consider establishing a periodic statewide evaluation of need utilizing a neutral third party evaluator.” (CAUSE-PA Comments, p. 45.) According to CAUSE-PA, “[e]stablishing a statewide evaluator process, used in establishing appropriate LIURP budget levels, would help to improve consistency in the availability of LIURP services across the state.” (CAUSE-PA Comments, p. 45.)

PPL Electric disagrees with this recommendation. The electric distribution companies’ (“EDCs”) Universal Service and Energy Conservation Plan (“USECP”) programs, including LIURP, undergo evaluation every five years in the USECP proceedings. Moreover, as part of developing and fine-tuning the budgets under the Company’s USECP, PPL Electric meets with stakeholders regularly to gain feedback, such as the Company’s formal USECP stakeholder meetings that are held twice a year. The Company believes the current processes for developing EDCs’ LIURP budgets are working well and do not need to be modified by incorporating a third-party statewide evaluator.

Also, the Pennsylvania Coalition of Local Energy Efficiency Contractors, Inc. (“PA-CLEEC”) proposes that the Commission implement “a uniform floor budget of 1.00% of utility jurisdictional revenues, reset annually based upon updated revenue figures,” for LIURP. (PA-CLEEC, pp. 6-7.)

PA-CLEEC’s proposal should be rejected for several reasons. Foremost, LIURP’s budget should be driven by the demand for LIURP projects in an EDC’s service territory, the availability

of ESPs to conduct those projects in the service territory in a timely and cost-effective manner, and the interest of customers who are ultimately responsible for paying for the costs associated with those projects. Additionally, in the Company's experience, the need for LIURP projects does not equal customers' interest in pursuing LIURP projects. The availability of quality ESPs that can perform the LIURP jobs also varies across EDCs' service territories. As such, the Company supports leaving the development of LIURP budgets to the individual EDCs' USECP proceedings, as opposed to setting an arbitrary funding floor.

Moreover, PA-CLEEC's proposal inappropriately focuses on total jurisdictional revenues. Specifically, PA-CLEEC's recommends a LIURP budget floor of 1.00% of an EDC's total jurisdictional revenues because "budgets as a percentage of jurisdictional revenues should be the same across all EDCs and [Natural Gas Distribution Companies]." (PA-CLEEC Comments, p. 7.) However, only residential customers will be paying for the LIURP-associated costs, and the amount of jurisdictional revenue from the residential customer class varies among the EDCs and natural gas distribution companies ("NGDCs"), given the different customer counts and usage characteristics in their service territories. Therefore, by setting a 1.00% budget floor based on total jurisdictional revenues, the dollar-for-dollar impact on residential customers across the EDCs' and NGDCs' service territories would vary significantly.²

Furthermore, it is completely unreasonable to set an arbitrary floor for LIURP funding and then, as proposed by PA-CLEEC, roll over unspent dollars from one program year to the next. (PA-CLEEC Comments, pp. 6-7.) Such an approach would result in bloated LIURP budgets that

² PPL Electric recognizes that NGDCs' LIURPs currently have a funding floor of 0.2% of jurisdictional revenues. *See* 52 Pa. Code § 58.4(a). However, even if a funding floor for EDCs based on a percentage of total jurisdictional revenues were appropriate, which it would not be for the reasons set forth in these Reply Comments, PA-CLEEC's proposal would be a substantial and unreasonable increase (*i.e.*, from the 0.2% of total jurisdictional revenues to 1.0% of total jurisdictional revenues).

do not adequately reflect the characteristics of the EDCs' service territories and, by extension, adversely affect EDCs' residential customers.

C. SECTION 58.11A. FUEL SWITCHING

The Commission proposes a new Section 58.11a titled "Fuel switching," which "provides requirements related to a public utility using LIURP funds for fuel switching between electric and natural gas." NOPR, p. 65. Under the proposed Section 58.11a

(a) LIURP funds may be used for program measures that involve fuel switching between electric and natural gas under either of the following conditions:

(1) When the public utility provides both electric and natural gas utility service to the LIURP participant.

(2) If the primary heating source provided by another public utility is determined to be inoperable or unrepairable or if the cost to repair would exceed the cost of replacement and both public utilities agree in writing that fuel switching is appropriate.

(b) The public utility shall document these conditions.

NOPR Annex A, p. 14.

The OCA and CAUSE-PA generally support the Commission's addition of fuel switching in Section 58.11a. (OCA Comments, pp. 47-49; CAUSE-PA Comments, pp. 68-71.) The OCA avers that "[i]n addition to considering space heating, in making a cost-effectiveness determination[,] a utility should be able to consider whether it would provide cost effective space cooling as well." (OCA Comments, p. 47.)³ PPL Electric continues to support the Commission's proposed addition of fuel switching and agrees with the OCA that the cost-effectiveness determination should consider the impacts of space cooling, not only space heating.

³ Similarly, at several points in its Comments, CAUSE-PA advocates for the addition of space cooling whenever space heating is referenced. (*See, e.g.*, CAUSE-PA Comments, pp. 22-23.)

D. SECTION 58.12. INCIDENTAL REPAIRS

The Commission proposes retitling Section 58.12 “Incidental repairs and health and safety measures” along with several substantive changes. Specifically, “[t]he proposed § 58.12(a) requires a public utility to identify in its USECP the criteria used for performing incidental repairs and health and safety measures.” NOPR, p. 72. “Services provided by incidental repairs and health and safety measures would be identified separately in proposed §§ 58.12(a)(1)-(2).” *Id.* Also, “[t]he proposed § 58.12(b) requires a public utility to set separate allowance limits for incidental repairs and health and safety measures through a USECP proceeding.” *Id.* Furthermore, “[t]he proposed § 58.12(c) establishes requirements under which a public utility may defer a dwelling that does not meet the criteria for incidental repairs or health and safety measures or that exceeds the maximum budget allowance” and “also requires a public utility to provide written notification to customers when the dwelling is deferred and require the public utility to track deferred dwellings for a period of at least three years.” *Id.*

CAUSE-PA recommends that “the Commission require utilities to establish a minimum allocation for both incidental repairs and health and safety measures to ensure funding is established and appropriately allocated to both purposes on a[n] equitable statewide basis.” (CAUSE-PA Comments, p. 53.) According to CAUSE-PA, the regulation should specify that “allowances for the combined total budget for both incidental repairs and health and safety measures will not be less than \$2,000 per home.” (CAUSE-PA Comments, p. 53.) Earth Justice Advocates similarly proposes that the Commission “[a]dd a minimum requirement for LIURP health and safety budgets of no less than \$2,000 per home, with flexibility to approve additional spending as necessary to ensure installation of available efficiency, weatherization, and usage reduction measures.” (Earth Justice Advocates Comments, p. 8.)

PPL Electric disagrees with these recommendations. If adopted by the Commission, these proposals would require utilities to devote significant portions of their LIURP budgets to these incidental repairs and health and safety measures, thereby resulting in less funding being available for LIURP measures. Moreover, CAUSE-PA and Earth Justice Advocates present no data to support their suggested threshold of \$2,000 per home. To the extent that any minimum funding threshold were established, the Commission should only do so on a case-by-case basis in public utilities' individual USECP proceedings, not through the instant rulemaking proceeding.

E. SECTION 58.14B. USE OF AN ESP FOR PROGRAM SERVICES

The Commission proposes to add a new Section 58.14b titled “Use of an ESP for program services.” NOPR, pp. 83-84. The Commission states in its NOPR that the regulation “establishes the use of an ESP to perform program services for a public utility LIURP” and sets forth the minimum qualifications for ESPs and a requirement to select ESPs through a competitive bid process. *Id.*, p. 84. Further, under the proposed subsection (c), the public utility must contract with more than one ESP, if applicable, and file and serve a justification if only one ESP is selected. *See id.* Subsection (d) provides that a public utility can prioritize contracts with CBOs that meet its ESP qualifications. *See id.*

CAUSE-PA and Energy Justice Advocates propose that the Commission require public utilities to prioritize contracting with CBOs that meet their ESP qualifications. (CAUSE-PA Comments, pp. 57-59; Earth Justice Advocates Comments, p. 7.) CAUSE-PA alleges that the Commission’s “proposed language in 58.14b(d) is insufficient to fulfill the Commission’s statutory mandate to encourage the use of CBOs in the delivery of LIURP services, and runs contrary to sound public policy to ensure local, trusted, and mission-driven agencies are contracted to deliver services across their communities.” (CAUSE-PA Comments, p. 57.) Likewise, Earth Justice Advocates contends that “[i]n order to meaningfully provide comprehensive LIURP

services to reach as many families as possible, trusted community partners are key and ought to be prioritized.” (Earth Justice Advocates Comments, p. 6.)

PPL Electric disagrees with CAUSE-PA and Earth Justice Advocates and supports the Commission’s proposed language. There is no statutory mandate for public utilities to use CBOs to implement their USECP programs, including LIURP. Section 2804(9) of the Public Utility Code only states that the Commission “shall encourage the use of community-based organizations that have the necessary technical and administrative experience to be the direct providers of services or programs which reduce energy consumption or otherwise assist low-income customers to afford electric service.” 66 Pa. C.S. § 2804(9) (emphasis added). The Commission’s proposed language comports with Section 2804(9) of the Public Utility Code by enabling public utilities to prioritize the use of CBOs that meet the ESP qualifications. The proposed language encourages public utilities to use CBOs and affords the public utilities the necessary discretion to prioritize the use of CBOs when appropriate.

In addition, it would be unreasonable to force public utilities to prioritize the use of CBOs over other contractors. When CBOs are underperforming and failing to meet their duties in a cost-effective manner, it is entirely reasonable for PPL Electric and other public utilities to select non-CBOs to perform the LIURP jobs. That is precisely what happened in PPL Electric’s service territory. The Company found that certain CBOs and non-CBO contractors were unable to meet their state weatherization targets and were experiencing staffing shortages. Therefore, PPL Electric rejected bids from those underperforming CBOs and non-CBOs. Thus, to ensure that projects are completed in a timely and cost-effective manner throughout the public utilities’ service territories, public utilities must have discretion over which contractors they use or do not use for LIURP projects.

Also, PA-CLEEC recommends that the Commission modify Section 58.14b(b) to impose requirements for public utilities' competitive bidding processes for selecting ESPs, including submitting and justifying their proposed RFPs and modifications thereto and requiring that those submittals and justifications be treated as public information. (PA-CLEEC Comments, pp. 10-12.)

PPL Electric strongly disagrees with PA-CLEEC's recommendations. As the entities actually administering and implementing the USECPs, it should be left to the public utilities' discretion on how they should conduct their RFPs to review, evaluate, and award bids. Moreover, nothing in the Public Utility Code: (1) sets forth specifications on the use of an RFP process for selecting LIURP contractors; or (2) directs the Commission to review and evaluate the LIURP contractor contracts before they are executed. This differs from, for example, EDCs' Energy Efficiency and Conservation ("EE&C") Plans, where Act 129 of 2008 ("Act 129") specifies that the Commission shall implement: (1) "[p]rocedures to require that electric distribution companies competitively bid all contracts with conservation service providers"; and (2) "[p]rocedures to review all proposed contracts prior to the execution of the contract with conservation service providers to implement the plan." 66 Pa. C.S. § 2806.1(a)(7)-(8). Given the lack of similar language with respect to LIURP, the Commission should reject PA-CLEEC's recommendation. Further, it is unclear whether PA-CLEEC is proposing that the Commission review and approve the RFPs and any modifications thereto before the RFPs are conducted. Nevertheless, to the extent that PA-CLEEC is recommending such a review and approval process, the Commission should reject that proposal for the same reasons outlined in this section.

F. SECTION 58.15. PROGRAM EVALUATION

For Section 58.15 of the LIURP regulations, the Commission proposes several amendments, including retitling the section “LIURP reporting and evaluation” and setting forth several detailed reporting requirements.

CAUSE-PA generally supports the Commission’s “enhancements” to Section 58.15. (CAUSE-PA Comments, p. 75.) However, CAUSE-PA proposes changes to these reporting requirements, including that public utilities be “required to track and report on the costs of termination, the collection costs, and incurred uncollectible expenses for the following segments of customers: (1) high usage customers; (2) high usage confirmed low income customers; (3) high usage customers enrolled in CAPs; and (4) customers who receive LIURP services.” (CAUSE-PA Comments, pp. 75-77.)

PPL Electric disagrees with CAUSE-PA’s recommendations. Specifically the Company opposes the collection of data for high usage customers. CAUSE-PA fails to quantify the increased time, resources, and costs associated with its proposed changes to the reporting requirements, while providing insufficient support for its proposed requirements that would justify those impacts. Weatherization work does not necessarily result in changed customer behavior or decreased usage. PPL Electric is concerned that it will expend considerable resources collecting information on high usage customers that will not provide data useful to improving LIURP offerings.

G. SECTION 58.16. ADVISORY PANELS

The Commission proposes several amendments to Section 58.16, including retitling the section “LIURP advisory committee” and incorporating changes to “provide greater flexibility for a public utility to collaborate with stakeholders by allowing a public utility to combine the functions of its LIURP advisory committee with its existing USAC.” NOPR, p. 89. Furthermore,

the amended Section 58.16 “requires a public utility to meet with stakeholders at least semiannually to consult and receive advice regarding its LIURP services.” *Id.*

The OCA and CAUSE-PA want the Commission to require that public utilities hold separate meetings with their USACs and LIURP advisory committees. (OCA Comments, pp. 54-56; CAUSE-PA Comments, pp. 79-81.)

PPL Electric opposes this recommendation. There is no need for separate meetings with the USACs and LIURP advisory committees. As conceded by CAUSE-PA, the LIURP advisory committee can include the members of a utility’s USAC. (CAUSE-PA Comments, pp. 80-81.) Therefore, it is inefficient and unnecessary to hold separate meetings with the USACs and LIURP advisory committees. At most, the Commission should clarify that both the USAC and LIURP advisory committee can be consulted at the same semi-annual meetings with stakeholders to provide their input on program services.

II. ADDITIONAL PROPOSALS

In its Comments, the OCA contends that the Commission’s regulations should: (1) be modified “to more directly recognize the objective of helping to control the costs of CAP Credits chargeable to non-participants”; (2) “require utilities to propose a mechanism in their plans to provide an accounting for the value of the reduced CAP Credits in an analysis of the cost-effectiveness of the programs themselves”; and (3) “more directly recognize the reduction in utility operating costs as arrears are reduced.” (OCA Comments, p. 62.)

PPL Electric disagrees with this recommendation. It is extremely difficult to quantify the impact of energy efficient appliances and weatherization on the reduction of CAP credits and reducing arrears. Although weatherization and more energy efficient appliances can help customers reduce their energy consumption, customers’ usage habits could change independent of

those measures being implemented. As such, a customer who implements weatherization, energy efficient appliances, or both could still see their energy consumption increase if their energy usage habits change. At best, public utilities could present data on CAP credits and arrearages that were reduced; however, the utilities cannot state with certainty that the implementation of energy efficient appliances and weatherization were the whole or partial cause of those reductions.

In addition, CAUSE-PA proposes that the Commission “establish statewide policies that would ensure access to a payment arrangement and/or re-set CAP benefits upon completion of LIURP services, “includ[ing] access to debt forgiveness accrued prior to the delivery of usage reduction services and waiver of any maximum credit threshold which a customer may have exceeded in the past – prior to receiving comprehensive usage reduction services.” (CAUSE-PA Comments, p. 86.)

PPL Electric disagrees with this recommendation. It is unclear what budget would pay for the re-set CAP benefits and debt forgiveness, how much the proposal would cost, and what the rate impact would be for public utilities’ customers.

Moreover, CAUSE-PA recommends that public utilities “proactively contact and provide such referrals” for “CAP, LIURP, and other universal service programs” to “any customer who has fallen more than one month behind on their bill prior to initiating collection efforts.” (CAUSE-PA Comments, p. 87.) According to CAUSE-PA, “[p]roactive universal service referrals and enrollment should be the first option for addressing customers with arrearages.” (CAUSE-PA Comments, p. 87.)

PPL Electric already conducts significant outreach to customers with arrearages. As an example, the Company enrolls OnTrack customers automatically in WRAP if they have usage of more than 18,000 kWh/year. However, the Company must undertake collection efforts to help

ensure that arrearages do not inflate to unreasonable amounts and adversely affect the Company's residential customer class.

III. CONCLUSION

As stated above and in the Company's Comments, PPL Electric supports the Commission's efforts to update the existing LIURP regulations and appreciates this opportunity to provide input on the NOPR. PPL Electric looks forward to working with the Commission and other stakeholder as this process moves forward.

Respectfully submitted,



Kimberly A. Klock (ID #89716)
Michael J. Shafer (ID #205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-5696
Fax: 610-774-4102
E-mail: kklock@pplweb.com
E-mail: mjshafer@pplweb.com

Date: February 15, 2024

Counsel for PPL Electric Utilities Corporation