



Over a Century
of Service

November 10, 2017

Chairman Gladys M. Brown
Pennsylvania Public Utility Commission
Commonwealth of Pennsylvania
P.O. BOX 3265
Harrisburg, PA 17105-3265

Dear Chairman Brown,

As we head into the winter heating season, Citizens' Electric Company is taking the follow actions to assist low-income customers with their winter electric bills:

- 1. Improve efforts to link consumers to programs that are available to help them restore and maintain service such as CAP, LIHEAP and utility or local hardship funds.** *Although Citizens' does not have a CAP program, Citizens' Customer Service Representatives ("CSRs") provide information about Dollar Energy, our hardship fund for customers that are struggling to pay their electric bill. We also provide information about LIHEAP and SEDA COG's Home Weatherization Program. Our CSRs also give information regarding our community based organizations ("CBOs") which can provide assistance to our low-income customers. Our website provides information about how to contribute to Dollar Energy as well as useful energy conservation measures our customers can take.*
- 2. Refer low-income consumers to CAP when they call to make payment arrangements. We expect the company to do everything possible to get eligible consumers into CAP, especially if a termination-related problem exists.** *Although Citizens' does not have a CAP program, we give our low-income customers every opportunity to make a reasonable payment arrangement in order to avoid termination. Adjustments can be made to this agreement as circumstances change.*
- 3. Increase corporate donations to utility Hardship Funds and other local programs that assist consumers who need help paying their utility bills.** *Citizens' matches contributions to the Dollar Energy fund up to \$5,000. We provide information about donating to the Dollar Energy fund using bill messages, bill inserts, our website, and customer newsletters.*
- 4. Review company procedures to ensure that automatic payments and online payments allow for consumer contributions to Hardship Funds.** *In addition to the procedures outlined in No. 3 above, online billed accounts automatically get notification of bill inserts and newsletters.*
- 5. Restore service to low-income consumers upon enrollment into the company's CAP for the first time.** *Please see No. 1 and No. 2 above. Service is restored to low-income customers upon an agreeable payment arrangement or assistance payments.*

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6. **Limit the number of terminations of confirmed low-income customers by scaling back the company's termination program as the cold weather approaches.**
This includes reviewing termination and reconnection procedures to allow consumers who are making good faith effort to pay their bills to keep utility service whenever possible. Citizens' exercises leniency for all low-income customers. CSRs use good judgment to establish reasonable payment arrangements for customers struggling to pay their electric bills.
7. **Waive or reduce security deposits, reconnection fees and late payment charges if they are a barrier to restoration of service or establishing a payment arrangement. Utilities have more discretion in waiving these fees than does the Commission. If a security deposit or reconnection fee is necessary, consider adding it to the customer's bill instead of making it a condition of providing service.** *Citizens' follows Chapter 56 Section 56.38 when requiring a security deposit which includes low-income customers. Citizens' does not terminate low-income customers during the winter so there are no reconnection fees. Normal billing procedures carry late fees forward.*
8. **Accept any combination of LIHEAP grant, crisis grant, and Hardship Fund grant as sufficient funds to turn on or reconnect service for low-income customers. If a customer payment is also necessary, we encourage you to be as lenient as possible.** *Citizens' accepts assistance payments to initiate service for low-income customers. There are no low-income winter terminations. During the 2016-2017 year, LIHEAP and various CBOs provided cash and crisis grants to our customers.*
9. **Exercising leniency when establishing payment arrangement plans for all customers. Again, utilities have more discretion in making payment arrangements than does the PUC. We ask for more responsiveness to the needs of all customers.** *Please see No. 1 and No. 2 above.*
10. **Provide customers with information about home heating safety and work to get customers who have been "red tagged" the assistance or information needed to help in obtaining repairs to furnaces or heating systems. Low-income customers may be referred to the LIHEAP crisis program for emergency repairs.** *Citizens' provides information about home heating safety on the Company website and through Company newsletters. CSRs, the Company website, newsletters and bill inserts provide information about payment assistance and crisis grant availability for home heating system repairs. Company correspondence with "red tagged" customers contains specific information about LIHEAP cash and crisis grants.*
11. **Promote the use of budget billing programs and third party notification forms.** *Citizens' CSRs provide information about budget billing and third-party notification. This information is also distributed through Company newsletters and bill inserts as well as the Company's website.*
12. **Provide information to customers regarding how they can reduce their heating costs through conservation including information on weatherization programs available as well as cost effective steps they can do themselves.** *Citizens' CSRs provide information regarding energy conservation and weatherization programs. CSR's refer to SEDA COG's Home Weatherization Program. This information is also routinely provided in Company newsletters. There are energy efficiency and weatherization booklets and brochures available in the Company office which is mailed to customers upon request.*

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Eric W. Winslow,
President & CEO