change in Commission policy and, unless adequate protections are incorporated, will throw into question and conflict with consumer protections currently contained in Pennsylvania Code, Title 52, Chapter 56. For example, Commission regulations contain strict rules governing for what types of service prepayment may be requested. 52 Pa. Code § 56.17 (Advance Payments). Importantly, the regulations explicitly exclude low income households, defined as those with income at or below 150% FPIG, from the group from whom prepayment may be requested. Id. at § 56.17(3)(i).

Additionally, prepay meters, very much like service limiters, introduce a level of danger to the consumer that is unjustifiable. In a fallible world where mistakes can and do happen, there is simply no justification, financial or otherwise, for employing a technology that will put consumers, particularly low income, elderly, or ill consumers, at a higher risk of incurring physical harm.

Furthermore, the smart meter plans are part of Act 129, an act the purpose of which is to help consumers employ energy efficiency and conservation tools so as to reduce consumption and thereby reduce their electric bills. It is unclear how or if prepayment capability advances this goal and, therefore, whether it is even appropriate to entertain in this proceeding.

Because prepay meters introduce an unacceptable increase in the possibility of harm to low income customers, violate Commission regulation, and have little correlation with energy conservation, ACORN respectfully submits the Commission should not grant approval to implement prepayment functionality for low income customers in any situation.