

May 13, 2020

VIA E-MAIL

The Honorable Eranda Vero
Philadelphia Administrative Law Judge
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107
evero@pa.gov

RE: Petition of PECO Energy Company for Approval of its Default Service Proceeding for the Period From June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290

Joint Letter Answer of TURN et al. and CAUSE-PA

Dear Judge Vero,

The Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (“TURN *et al.*”), together with the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (collectively, “Low Income Advocates”), submit this joint letter answer in response to PECO Energy Company’s Motion *in Limine* to Establish the Scope of the Public Input Hearing, filed on May 11, 2020 (“Motion”) in the above-captioned proceeding (“DSP”).

The Low Income Advocates submit that PECO’s proposal regarding the scope of public input, set forth in Appendix A to the Motion, identifies several salient topics for public input. Furthermore, as Appendix A makes clear, public input is not limited to those proposals PECO has made in this DSP proceeding, but also includes alternatives to PECO’s proposals. However, the language in Appendix A concerning PECO’s proposal to permit shopping by CAP customers is too narrow.

PECO’s proposed CAP Shopping Plan consists of a number of elements beyond “permit[ting] shopping by customers participating in PECO’s Customer Assistance Program.” Motion, Appendix A at 2. PECO’s Petition includes modifications to PECO’s CAP program, which, if approved, would change how PECO calculates the fixed credit that CAP customers receive. If approved, PECO would use the EGS charges billed to those CAP customers who choose to shop, rather than PECO’s price-to-compare, to calculate the fixed credit. Petition ¶¶66.¹ Furthermore, PECO proposes to implement a variety of customer education initiatives “as part of” its CAP Shopping Plan. Petition ¶¶64. The appropriateness and adequacy of those changes are appropriate subjects for public input, but do not appear to fit within the scope proposed by PECO.

¹ See PECO USECP, Docket No. M-2012-22990911, Joint Petition, at Exhibit A-1, available at <http://www.puc.state.pa.us/pdocs/1349218.pdf>.

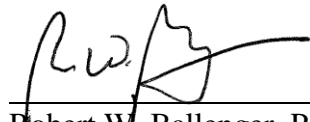
As a result, the Low Income Advocates submit that the language of the proposed notice regarding CAP shopping, set forth at Appendix A to the Motion, should be revised to read as follows:

4. PECO's proposals to modify its current Customer Assistance Program (CAP) and to implement a CAP Shopping Plan which would, among other things, permit CAP customers to shop for electricity.

Finally, the Low Income Advocates submit that, for purposes of public input, testimony should be considered within the scope if that testimony is relevant, broadly construed, to the matters included in the notice. This should include any matters concerning competitive market programming or market access issues that may warrant further policies and consumer protections consistent with the Public Utility Code and Commission regulations. Members of the public should be encouraged to participate, and should be given the leeway to express their concerns, even though they may not be as well-versed in public utility policy as the parties and their witnesses.

Thank you for your consideration of this joint letter answer.

Sincerely,



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Cc: Service List

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Program for : P-2020-3019290
the Period From June 1, 2021 Through :
May 31, 2025 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the Joint Letter Answer of TURN *et al.* and CAUSE-PA to PECO Energy Company’s Motion *in Limine* to Establish the Scope of the Public Input Hearing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54.

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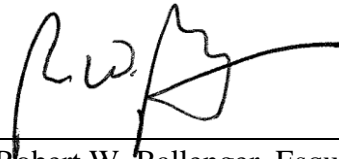
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