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**E-File**

June 15, 2020

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

**Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions  
Request for Utility Information  
Docket No. M-2020-3020055**

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Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") are responses to the inquiries contained in the May 29, 2020 Secretarial Letter referenced above.

In accordance to the guidelines in the May 29, 2020 Secretarial Letter, certain portions of this response have also been sent to Sarah Dewey of the Bureau of Consumer Services and Tom Charles, Director of Communications.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is deemed filed on June 15, 2020, 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,

A handwritten signature in blue ink, appearing to read "Michael J. Shafer", written over a light blue horizontal line.

Michael J. Shafer

Enclosure

cc: Sarah Dewey – via email  
Tom Charles – via email

**PPL Electric Utilities Corporation**  
**Response to COVID-19 Customer Service, Billing, and Public Outreach Provisions**  
**Request for Utility Information**  
**Date June 2, 2020**  

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**Docket No. M-2020-3020055**

**Termination of Utility Service**

After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

- How does the utility plan to implement terminations and will it start the process with new termination notices?

**PPL Electric's Response:**

PPL Electric recommends that the Commission lift its Emergency Order on July 10, 2020. This is the date originally suggested in the May 20, 2020 letter to Governor Wolf from various consumer advocate stakeholders. PPL Electric believes ending the Emergency Order on July 10, 2020 strikes a balance between protecting customers who have been impacted by COVID-19, and not allowing utility bill arrearages to balloon to unsustainable levels. Also it should be noted that under PPL Electric's proposed plan detailed below, actual terminations would not occur until after PPL Electric has made several attempts to contact and assist payment troubled customers, and the required pre-termination notifications.

PPL Electric has developed a COVID-19 specific collection strategy to assist payment troubled customers. All terminations will be treated as new terminations with the notice process restarting. Prior to any termination notices being sent, there will be a series of customer outreach attempts to negotiate payment arrangements with customers. There will be a dedicated team of customer service representatives who will perform this outreach program.

The pre-termination notice customer outreach will consist of three attempts to contact the payment troubled customer. The first attempt will be an automated outbound call which will include a payment reminder, information regarding help with bill payment, and notice that a live agent will also be calling. The second attempt will be a live agent outbound

call which will occur 3-5 days after the automated call. The CSR will provide the customer with the same information from the automated call and attempt to negotiate a payment arrangement. If the second attempt is unsuccessful there will be another live agent outbound call 3-5 days after the second attempt. The Company will only start the termination process if it is unable to enter into a payment arrangement with the customer after the three customer outreach attempts.

In addition to payment arrangements, the CSRs will be authorized to enter into Special Agreements with customers. A Special Agreement is an agreement that breaks a large balance down into monthly installments that is not solely based on income levels or minimum installment terms, like a regular company payment arrangement would be. The customer can offer an amount to pay initially, if they are able, but payment is not required. All customers who are currently late on their bill or have a past due balance are eligible for a Special Agreement. Special Agreements are a one-time offering, and if the Special Agreement is defaulted on, residential customers would be eligible for a regular payment arrangement. The Company will offer Special Agreements during one of the outbound customer outreach calls.

PPL Electric will start the customer outreach program with Level 3, 4, commercial customers, and customers for whom the Company does not have income information. It is anticipated that this phase will take several weeks. After the first phase the Company will start the customer outreach program for Level 1 and 2 customers. The communications to Level 1 and 2 customers will be refined by lessons learned from the first phase of customer outreach. Also, there will be added emphasis on informing Level 1 and 2 customers about universal service benefits that they may be eligible for. The exact timing of this customer outreach program will depend on when the Commission's moratorium under the Emergency Order on Terminations is lifted.

It is important to note that it is PPL Electric's preference to take a gradual approach to restarting terminations as outlined in the above customer outreach proposal. As discussed, this process will take several weeks to implement, and potentially several more weeks after the customer contacts are made to finalize the payment arrangement, Special Agreement, or enroll the customer in an appropriate universal service program. If the moratorium is lifted at a time closer to the winter moratorium PPL Electric may not have enough time to utilize the outlined gradual approach and instead have to take a more expedited approach to terminations.

### **Termination of Utility Service**

Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
- Provide future projections if available.

### **PPL Electric's Response:**

The data below compares the number of payment troubled customers from May 2019 to May 2020. The Company does not have any future projections on how these numbers will change going forward in 2020.

2019 – Total Customers All Classes - 104,832

2020 – Total Customers All Classes - 118,611

13.1% increase over the prior year

<b>At-Risk - May, 2019</b>		
<b>Customer Class</b>	<b>Low Income?</b>	<b>Account Count</b>
Non-residential	N/A	3,509
Residential	N	31,682
Residential	Y	69,641

<b>At-Risk - May, 2020</b>		
<b>Customer Class</b>	<b>Low Income?</b>	<b>Account Count</b>
Non-residential	N/A	5,890
Residential	N	38,320
Residential	Y	74,401

### **Termination of Utility Service**

Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

### **PPL Electric’s Response:**

No, the Company is not currently charging reconnection fees. PPL Electric proactively contacted customers who were terminated prior to the Commission’s Emergency Order and offered to reconnect these customers. The Company did not charge a reconnection fee to these customers to restore service.

**Universal Service Programs:**

Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**PPL Electric's Response:**

No, since the Commission's issuance of its Emergency Order on Terminations, PPL Electric has not been removing customers from CAP for non-payment or failure to recertify.

### **Universal Service Programs:**

What are the utility's current Hardship Fund payment requirements to qualify low-income customers for grants (e.g. waiving payment history "good faith payment", or CAP participation criteria) and have these requirements been revised due to the pandemic?

### **PPL Electric's Response:**

PPL Electric has made several changes to its Hardship Fund (Operation HELP) in light of the COVID-19 pandemic. Operation HELP was traditionally a program where the customer was directed by PPL Electric to apply at the CBO with most applicants applying in person for the grant. As a result of COVID-19, PPL Electric updated the application process to use one application for both OnTrack and Operation HELP. Customers are now directed to apply over the phone, online, or to use a mailed application. PPL Electric has stopped directing customers to the agencies for program funds. Rather, PPL Electric has updated its website, internal procedure, and CBO procedure to clarify that any customer completing an assistance application should be evaluated for OnTrack and Operation HELP. Prior to COVID-19, Operation HELP was only available to customers at or below 200% of FPL, but PPL Electric petitioned for a waiver to increase income guidelines from 200% of FPL to 250% of FPL, which was approved by the PUC. Additionally, customers needing assistance who are above 250% FPL can be referred to PPL Electric's CARES program. And lastly, the PPL Foundation donated \$500,000 to Operation HELP to assist customers impacted by COVID-19.

**Other Assistance Initiatives:**

Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

**PPL Electric's Response:**

See PPL Electric's response to the first question regarding the Company's plans to engage in customer outreach prior to resuming terminations.



**Other Assistance Initiatives:**

Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

**PPL Electric's Response:**

See PPL Electric's response to the first question regarding the Company's plans to engage in customer outreach prior to resuming terminations.

**Other Assistance Initiatives: Consumer Education and Outreach**

Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

**PPL Electric Response:**

See Attachment 1 – COVID-19 Customer Communications.

**Other Assistance Initiatives: Consumer Education and Outreach**

Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

**PPL Electric's Response:**

See Attachment 1 - COVID-19 Customer Communications. PPL Electric has used a variety of communication methods to reach a broad audience of its customers.

### **Other Assistance Initiatives: Consumer Education and Outreach**

Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

### **PPL Electric's Response:**

PPL Electric has been cooperative in its formal proceedings before the Commission to accommodate the needs of the other parties. Some examples of this are PPL Electric agreeing to participate in telephonic and video conference hearings, accepting electronic service of filings, and where appropriate agreeing to extensions of schedules and postponements of hearings.

**Other Assistance Initiatives: Consumer Education and Outreach**

Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

**PPL Electric's Response:**


The Lifeline Program for Telephone and Broadband Internet Service is not applicable to PPL Electric.

COVID-19  
Customer Communications

# March 2020 – Customer Outreach

Date	Tactic	Audience	Message
3/16	Email	All customers	Preparations, social distancing, moratorium on service cuts
3/16	News release	Media	Preparations, social distancing, moratorium on service cuts
3/16	Website – home page marquee and dedicated web pages	All customers	Links to COVID-related updates, including assistance programs, social distancing and safety info, energy efficiency tips, scam alerts, resources for businesses (from PA, chambers, etc.). <b>Web pages remain live and are being updated regularly.</b> <ul style="list-style-type: none"> <li>• <a href="http://ppl electric.com/coronavirus">ppl electric.com/coronavirus</a></li> <li>• <a href="http://ppl electric.com/coronavirus-business">ppl electric.com/coronavirus-business</a></li> </ul>
3/19	News release	Media	Moratorium on late fees
3/26	Email	Residential customers	Looking out for our customers: assistance programs, moratorium on service cuts, scam alerts
3/26	Email	Business customers	Resources for businesses, moratorium on service cuts, scam alerts
3/26	News release	Media	Looking out for our customers: assistance programs
All	Social Media	All customers	Organic social posts ( <b>27 total posts</b> ) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc. <ul style="list-style-type: none"> <li>• Facebook (9)</li> <li>• Twitter (10)</li> <li>• LinkedIn (2)</li> <li>• IG (6)</li> </ul>


# March 2020 – Customer Outreach Examples




**PPL Electric Utilities**  
Mar 17

We're facing this public health challenge together. We will not cut off service to any customer for unpaid bills until further notice, and we will reconnect service for any customers who were disconnected recently. #COVID19

[Read Less](#)



My Account   Outages   Ways to Save



**We're all in this together**

**Looking out for our customers**

We're facing this public health challenge together. Here are some of the things we're doing to look out for our customers during this coronavirus pandemic.

**Delivering on our core mission**

Our homes, health-care facilities and grocery stores need reliable electricity to keep moving during this crisis. Powering our communities remains our number one responsibility.

Rest assured, throughout this crisis and beyond, we're working every day to maintain a strong, resilient and reliable power grid. You need us to keep your lights on, and we're here for you. And we're doing it safely by limiting direct interaction between our employees and customers and respecting social distancing at all times.

**Offering assistance to customers in need**

If you can't pay your bill during this crisis, **we will not cut off your electric service. We've also waived late payment charges** for all customers, effective March 16, 2020.

Beyond that, a variety of payment assistance programs are available if you're struggling to pay your bill during this time.

- **OnTrack** offers a lower, fixed monthly bill and debt forgiveness for customers who are income-eligible.
- **Operation HELP** is a fund supported by our company, employees and customers. It provides grants to help eligible customers pay their heating bills. We're happy to say that our PPL Foundation recently donated an extra \$500,000 to Operation HELP.
- **LIHEAP** is a federal program that provides cash and crisis grants to eligible customers. It's open through April 10, so there's still time to apply.
- **Budget billing** can smooth out your payments so they're consistent and predictable throughout the year.
- We may be able to set you up with a **payment arrangement** to split up past due balances into installments.

[Learn more and apply for assistance](#)

News Releases



Mar 19, 2020

**PPL Electric Utilities waving late bill fees during COVID-19 pandemic**

Measure provides additional help during health crisis

ALLENTOWN, Pa. (March 19, 2020) – PPL Electric Utilities announced Thursday (3/19) it is waiving late bill fees for all customers until further notice in order to provide more financial support during the coronavirus pandemic.

Consistent with last week's order from the state Public Utility Commission for utilities statewide, PPL already suspended service shutoffs for non-payment until further notice and reconnected customers who were recently disconnected. Late fees are waived effective March 16, 2020 and any late fees charged since then will be refunded.

"These are unprecedented times," said Lori Mueller, PPL's vice president of



**PPL Electric Utilities**  
Mar 20

The PPL Foundation has contributed \$500,000 to our Operation HELP program to support customers dealing with temporary financial hardship. #pplcares #COVID19

[Read More](#)





# April 2020 – Customer Outreach

Date	Tactic	Audience	Message
4/1	Bill insert	Residential customers	Assistance programs: OnTrack, Operation HELP, payment assistance – <b>inserted throughout April</b>
4/1	Bill insert	Business customers	Resources for businesses, moratorium on service cuts, scam alerts - <b>inserted throughout April</b>
4/14	Blog	All customers	We're standing with our customers through the pandemic: safety, payment assistance, moratorium on service cuts and late fees
4/20	Video	Targeted customer groups	Energy Efficiency tips while spending more time at home (30- and 60-second spot) <a href="https://vimeo.com/408996169">https://vimeo.com/408996169</a>
4/20	Paid digital	Targeted customer groups	Energy Efficiency tips while spending more time at home; YouTube, Hulu, streaming radio and Facebook; <b>campaign in flight through 6/15</b>
4/20	Broadcast	Targeted customer groups	Energy Efficiency tips while spending more time at home; cable and local television ad buy; <b>campaign in flight through 6/15</b>
4/20	Website landing page	All customers	Savewithppl.com updated to include spot and blog post
4/21	Email	Business customers	We're standing with our customers through the pandemic: safety, moratorium on service cuts and late fees
4/25	Email	All customers	Check your electric supply rate and shop for the best deal
All	Social Media	All customers	Organic social posts ( <b>56 total posts</b> ) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc. <ul style="list-style-type: none"> <li>• Facebook (21)</li> <li>• Twitter (17)</li> <li>• LinkedIn (8)</li> <li>• IG (10)</li> </ul>

# April 2020 – Customer Outreach Examples

PPL Stories ABOUT US

**COMMUNITY**

## WE'RE STANDING WITH OUR CUSTOMERS THROUGH THIS PANDEMIC

APRIL 14, 2020

These are strange times. Everything's different. But I want all of our PPL customers to know that we're still here for you. We're working day and night to keep your power flowing so we can get through this crisis together.

We're still working for you, but we've changed some of the ways we work so we can keep our employees and our communities safe.

We've taken steps to see that our employees and contractors in the field are limiting contact with each other and with our customers. They're practicing social distancing, and we're asking the public to do the same. If you need to interact with a PPL representative for any reason, please keep a safe distance of at least 10 feet. You'll also see that our employees have begun wearing face masks, as suggested by Governor Wolf.

These new ways of working extend throughout PPL. Our employees who can work remotely are doing so. That includes our Customer Contact Center associates, who are providing customer support from their kitchens, living rooms and home offices.

We're getting used to doing business in this "new normal," but we're also prepared for whatever mother nature throws at us next. We developed plans to safely, efficiently and swiftly respond to customer outages during storms and other emergencies. We've also reached out to other utilities and mutual aid partners to assure them of the measures we're taking to protect them.

Recently, we had the opportunity to respond to two wind storms. We saw widespread outages, and we worked around the clock to restore power for our customers. When the next storm hits, we'll be there.

I'm also happy to say that we're taking steps to help our customers out during this unprecedented time.

We've suspended all orders to cut service for unpaid bills and stopped applying late payment fees until further notice. We also want you to know that we have a variety of payment assistance programs available that may be able to help. Please, don't hesitate to reach out to us if you're struggling to make a payment. We'll work with you.

We set up a special web page where we're posting all of our latest updates on the crisis, including links to our assistance programs, energy saving tips, information on how to avoid scams and more. Please visit [ppl.com/coronavirus](http://ppl.com/coronavirus) regularly for updates.



## WE'RE ALL IN THIS TOGETHER

PPL Electric Utilities offers several assistance programs to help you pay your electric bill.

- Payment Assistance:** Set up a payment arrangement that works for you.
- Budget Billing:** Smooth out your payments so they're consistent and predictable.
- OnTrack:** Apply for reduced monthly payments and debt forgiveness. (Available for income-eligible customers.)

**Neighbor Helping Neighbor**  
Operation HELP provides financial support for income-eligible families struggling with their energy bills. To apply for support – or to donate to the fund – visit [ppl.com/operationhelp](http://ppl.com/operationhelp).

Explore all our assistance programs at [ppl.com/billhelp](http://ppl.com/billhelp).

PPL Electric Utilities

My Account Outages Ways to Save

### We want to help you save, especially during these tough times.

Times are tough, and it's important to save money wherever you can. Now is the time to check the price you are paying for your electricity supply to make sure you aren't paying too much.

We want to help you save, and we have some good news. If you're not comfortable with the price you're paying now, it's easy to compare electricity suppliers. You can find one that offers the service, energy supply source (renewables vs. other sources) and price that is right for you. If you do decide to switch suppliers, check with your current supplier to make sure you're not surprised by early termination fees.

And if you don't want to choose a supplier, you can always switch back to PPL's default service. This is the rate available to all customers who choose not to shop. **We'll buy the power for you and pass on the cost without profit to us.** The current Price to Compare for PPL's default service is 7.632¢/kWh, and it's adjusted every June 1 and Dec. 1.

Learn more so you can take action. Visit our [Shopping 101](http://Shopping101) website for everything you need to know to shop for electricity, compare rates and protect yourself from scams.

**Stay healthy and stay safe!**

[Shop for electricity supply](#)

PPL Electric Utilities  
April 20

While you're spending more time at home, PPL's Energy Efficiency Programs offer tools and tips for saving energy and money.

[PPL.ELECTRIC.COM/LEARN-MORE](http://PPL.ELECTRIC.COM/LEARN-MORE)

Ways to help you save  
PPL Energy Efficiency Programs

[Learn More](#)

YouTube

Save with PPL  
Learn How

Skip Ad 00:31



# May/June 2020 – Customer Outreach

Date	Tactic	Audience	Message
5/6	Email	Residential customers eligible for income assistance programs	Bill help: payment assistance programs, energy efficiency tips
5/6	Email	Small business customers	Small business week; resources for businesses (from PA, chambers, etc.)
5/8	Blog	All customers	Energy Efficiency tips for spending more time at home
5/8	Website marquee	All customers	Energy Efficiency tips
5/11	Email	Customers whose energy use increased in the previous month	Energy Efficiency tips for spending at home - drive to savewithppl.com
5/11	Outbound call	Customers whose energy use increased in the previous month	Energy Efficiency tips for spending at home – drive to savewithppl.com
5/21	Email	Residential customers eligible for LIHEAP	Notice that LIHEAP has reopened
5/21	Webinar	Small business customers	Live webinar with tips to manage bills; <b>three webinars held throughout May and June</b>
5/21	Outbound call	Residential customers who had received LIHEAP grant in 2020	Notice that LIHEAP has reopened; notification of consent needed to apply for additional funds
6/1	Bill insert	All customers	Special edition of Connect newsletter with Bill Help focus: assistance programs, energy efficiency tips, shopping tips, other resources – <b>inserted throughout June</b>
All	Social Media	All customers	Organic social posts ( <b>38 total posts</b> ) relating to our COVID response. Topics included bill help options, preparation and safety practices, scam alerts, energy efficiency tips, etc. <ul style="list-style-type: none"> <li>• Facebook (15)</li> <li>• Twitter (11)</li> <li>• LinkedIn (7)</li> <li>• IG (5)</li> </ul>

# May/June 2020 – Customer Outreach Examples

 PPL Electric Utilities  
6 days ago

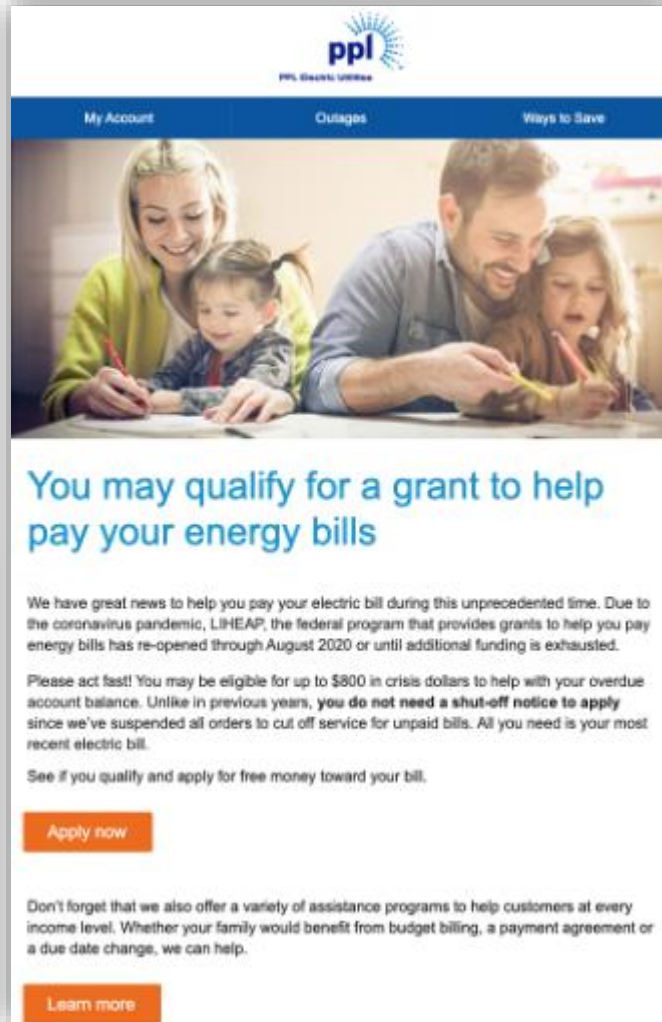
LIHEAP has re-opened with additional funding to help customers through #COVID19. Apply today. <http://ow.ly/SRtq50zMPvF>



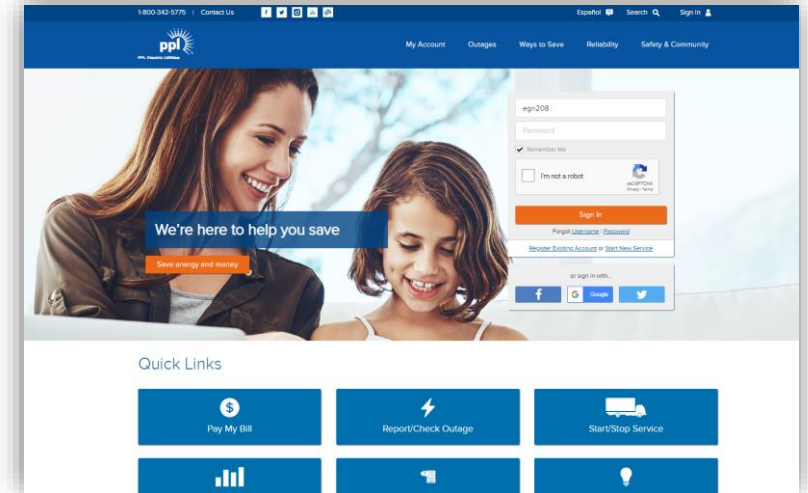
 PPL Electric @PPElectric  
May 15

Need help paying your electric bill? Complete a quick and easy application at [ppllectric.com/ontrack](http://ppllectric.com/ontrack) and see if your family qualifies for these great benefits:

1. Lower monthly payments
2. Debt forgiveness
3. Energy savings



The screenshot shows a website banner with the PPL logo at the top. Below the logo are navigation links for 'My Account', 'Outages', and 'Ways to Save'. The main image shows a family of four (mother, father, and two children) sitting at a table, smiling and looking at a document. Below the image is the headline: 'You may qualify for a grant to help pay your energy bills'. The text below reads: 'We have great news to help you pay your electric bill during this unprecedented time. Due to the coronavirus pandemic, LIHEAP, the federal program that provides grants to help you pay energy bills has re-opened through August 2020 or until additional funding is exhausted. Please act fast! You may be eligible for up to \$800 in crisis dollars to help with your overdue account balance. Unlike in previous years, **you do not need a shut-off notice to apply** since we've suspended all orders to cut off service for unpaid bills. All you need is your most recent electric bill. See if you qualify and apply for free money toward your bill.' There are two orange buttons: 'Apply now' and 'Learn more'.



The screenshot shows the PPL website's login and sign-up page. At the top, there's a navigation bar with 'My Account', 'Outages', 'Ways to Save', 'Reliability', and 'Safety & Community'. The main content area features a large image of a woman and a young girl smiling. Overlaid on this image is a sign-in form with fields for 'Email or Phone Number' (containing 'egp208'), 'Password', and a 'Remember me' checkbox. There's a 'Sign In' button and a 'Forgot Password' link. Below the form are social media icons for Facebook, Instagram, and Twitter. At the bottom, there's a 'Quick Links' section with six buttons: 'Pay My Bill', 'Report/Check Outage', 'Start/Stop Service', and three others with icons for a bar chart, a house, and a lightbulb.