


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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November 2, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: PECO Energy Company's 2016-2018 USECP,
Docket No. M-2015-2507139

Pennsylvania Public Utility Commission

v.

PECO Energy Company
Docket No. R-2018-3000164

Dear Secretary Chiavetta,

On October 13, 2020, PECO Energy Company (PECO or Company) filed its Petition for Expedited Approval to Extend its De Facto Heating Pilot Program and to Use Unspent 2020 Pilot Program and Health and Safety Funds in 2021. Due to the COVID-19 pandemic, PECO was unable to expend the allocated dollars for its De Facto Heating Pilot Program (De Facto Pilot) and its Low Income Usage Reduction Program Health and Safety program (LIURP Health and Safety) in 2021. The Company stated that due to COVID-19, it suspended all in-home appointments from March 23, 2020 until October 5, 2020. In its Petition, PECO requests the following: (1) an extension of the Company's De Facto Pilot until the earlier of (a) the date all remaining De Facto Pilot monies are exhausted or (b) September 30, 2021; and (2) the use in calendar year 2021 of funds for both the De Facto Pilot and PECO's LIURP Health and Safety measures commitment from PECO's most recent Electric Base Rate case settlement at Docket No. R-2018-3000116 originally required to be spent in 2020.

The Office of Consumer Advocate supports the Company's Petition to extend its De Facto Pilot and to use the unexpended dollars for its De Facto Pilot and LIURP Health and Safety program in 2021. The De Facto Pilot addresses problems with the use of energy inefficient and potentially unsafe space heaters for customers at or below 200% of the Federal Poverty Level, and the LIURP Health and Safety program increased PECO's annual LIURP budget by \$1 million to address health, safety, and structural issues in low-income customers' homes that would otherwise prohibit or impede the installation of LIURP measures or treatments for these customers. The Company's proposal will extend the use of previously allocated-dollars for two important programs into 2021 and help customers to be able to obtain weatherization and maintain service. The OCA submits that the Company's Petition should be approved.

If you have any questions, please contact me at (717) 783-5048.

Respectfully Submitted,

/s/ Christy M. Appleby

Christy M. Appleby

Assistant Consumer Advocate

PA Attorney I.D. # 85824

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Enclosures:

cc: Joseph Magee, Bureau of Consumer Services (**email only**)

Louise Fink-Smith, Law Bureau (**email only**)

Certificate of Service

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CERTIFICATE OF SERVICE

Re: PECO Energy Company 2016-2018 :
Universal Service and Energy : Docket No. M-2015-2507139
Conservation Plan :
 :
 :
 :
 Pennsylvania Public Utility Commission :
 v. : Docket No. R-2018-3000164
 PECO Energy Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Letter Re: In Support of PECO Energy Company's Petition, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 2nd day of November 2020.

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