



May 13, 2022

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Joint Petition of MetEd, Penelec, Penn Power & West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2023, through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21

Dear Secretary Chiavetta,

In accordance with 52 Pa. Code § 5.412a, please accept for filing the following preserved written testimony, along with the associated exhibits and appendices, which was duly admitted to the record via Stipulation by the Honorable Jeffrey A. Watson at the hearing held in the above captioned proceedings on April 13, 2022.

- **CAUSE-PA Statement 1, the Direct Testimony of Harry S. Geller**
 - Attachments: CAUSE-PA Exhibits 1 through 7 and CAUSE-PA Appendix A and B.
- **CAUSE-PA Statement 1-R, the Rebuttal Testimony of Harry S. Geller**
 - Attachments: CAUSE-PA Appendix A and B.
- **CAUSE-PA Statement 1-SR, the Surrebuttal Testimony of Harry S. Geller**

A copy of this letter is being served consistent with the attached Certificate of Service. Please contact me with any questions or concerns.

Respectfully Submitted,
Counsel for CAUSE-PA

A handwritten signature in blue ink, appearing to read "Elizabeth R. Marx".

Elizabeth R. Marx, Esq.

CC: The Honorable Jeffrey A. Watson
Parties of Record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company, :
Pennsylvania Electric Company, Pennsylvania : Docket No. P-2021-3030012
Power Company, and West Penn Power Company : Docket No. P-2021-3030013
for Approval of their Default Service Programs for : Docket No. P-2021-3030014
the period commencing June 1, 2023, through May : Docket No. P-2021-3030021
31, 2027 :

CERTIFICATE OF SERVICE

I hereby certify I have on this day served copies of **Compliance Filing, 52 Pa. Code § 5.412a**, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) and consistent with the Commission’s March 20 Emergency Order at Docket M-2020-3019262.

VIA EMAIL

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DATE: May 13, 2022

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company,	:	
Pennsylvania Electric Company, Pennsylvania	:	Docket No. P-2021-3030012
Power Company, and West Penn Power Company	:	Docket No. P-2021-3030013
for Approval of their Default Service Programs for	:	Docket No. P-2021-3030014
the period commencing June 1, 2023, through May	:	Docket No. P-2021-3030021
31, 2027	:	

DIRECT TESTIMONY OF HARRY GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

February 25, 2022

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PREPARED DIRECT TESTIMONY OF HARRY GELLER

Q. Please state your name, occupation, and business address.

A. Harry Geller. I am an attorney. I am currently retired, but have maintained an office at the Pennsylvania Utility Law Project (PULP), 118 Locust St., Harrisburg, PA 17101 and serve as a consultant to organizations representing the low income and their clients. Since the Governor’s Emergency Order regarding the COVID-19 pandemic, I have been working from 4213 Orchard Hill Rd, Harrisburg, PA, 17110.

Q. Briefly outline your education and professional background.

A. I received my B.A. degree from Harpur College, State University of New York at Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in 1969. Upon graduation from law school, I entered the Volunteers in Service to America (VISTA) program, where I was assigned to the New York University Law School. I took courses in the Law School’s Urban Affairs and Poverty Law program and worked with the Community In Action Program on the West Side of Manhattan in New York City from 1969-1971. In 1971, I started as a Staff Attorney for the New York City Legal Aid Society, Criminal Court and Supreme Court Branches in New York County. In 1974, I moved to Pennsylvania and began working for Legal Services, Incorporated (LSI). LSI was a civil legal aid program serving Adams, Cumberland, Franklin and Fulton Counties. I worked at LSI from 1974-1987 first as a Staff Attorney, then as Managing Attorney, and ultimately became Executive Director. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

In 1988, I was hired to be the Executive Director of PULP, a statewide legal services program dedicated to the rights of low-income utility customers. At PULP, I represented low-

1 income individuals with utility and energy concerns, and supported organizations advocating for
2 low income households in utility and energy matters. As the Executive Director of PULP, I
3 consulted and co-counseled on a wide variety of individual utility consumer cases, and I
4 participated in task forces, work groups and advisory panels. For many years, I served as Chairman
5 of the LIHEAP Advisory Council to the Department of Human Services and the Consumer
6 Advisory Council to the Public Utility Commission. Throughout my career, I regularly trained
7 community organizations, legal aid staff, and advocacy groups across Pennsylvania about the
8 various utility and energy matters affecting Pennsylvania's low-income population. I retired from
9 PULP on June 30, 2015. Although no longer employed by PULP, I now serve as a consultant to
10 PULP and its clients. In sum, I have over 50 years' experience working with and providing
11 services to households in poverty, including the past 34 years focusing specifically on utility and
12 energy issues affecting low-income consumers. My resume is attached as Appendix A.

13 **Q. Please describe the focus of your work, including relevant work experience on issues**
14 **of low-income families' ability to afford essential goods and services such as utilities?**

15 A: I have represented low-income individuals and organizations serving low income
16 populations in a wide variety of legal matters, including family law, public benefits,
17 unemployment compensation, utility shut-offs, debtor/creditor, bankruptcy, and housing related
18 disputes. Over the past 34 years, my focus has been ensuring that low-income households can
19 connect to, afford, and maintain utility and energy services.

20 In all of these legal matters, I worked almost exclusively on behalf of individuals and
21 households that subsist on income that is at or below 150% of the Federal Income Poverty
22 Guidelines (FPIG). Through this work, I have become intimately familiar with the daily lives of
23 countless of our poorest citizens. I have spent thousands of hours assisting clients to comb through

1 their budgets to attempt to assist them to make ends meet. Over the years, I have consistently been
2 surprised by the almost complete inability of low-income families to pay the most basic monthly
3 necessities on the incomes they have. Each and every month, my clients faced the stark choice of
4 choosing which bills they could forgo with the least drastic consequences. That struggle is even
5 more profound today than when I retired several years ago, as low income communities face
6 unprecedented economic disparities as a result of the pandemic response.

7 In addition to my deep understanding of the daily monetary struggles facing poor families,
8 I have an extensive knowledge of the array of programs designed to allow low-income individuals
9 to afford electric service and other essential utility services.

10 While at PULP, I was involved in countless proceedings evaluating the effectiveness of
11 required Universal Service Programs to assist low-income families. I have spent thousands of
12 hours identifying program issues in Universal Services and making recommendations for changes
13 to Universal Service programming to better serve low-income consumers. Ultimately, this
14 advocacy led to the recognition that integrated programs for low income consumers were
15 necessary. As the Executive Director of PULP, I played an instrumental role in the development,
16 oversight, and monitoring of the initial pilot programs that have since evolved into the current
17 statutorily required low-income Universal Service Programs. Each of these programs is structured
18 to provide a different and complementary form of assistance to low-income customers, such that
19 those customers have the ability to afford and maintain basic utility service.

20 For example, the Customer Assistance Program (CAP) provides alternatives to traditional
21 collection methods for low income, payment troubled utility customers. The Low Income Usage
22 Reduction Program (“LIURP”) is a targeted weatherization and energy efficiency program
23 designed to assist low-income households with the highest energy consumption, payment

1 problems, and arrearages. These programs work in tandem and are designed to assist low-income
2 households in maintaining affordable utility services and safe living environments while reducing
3 utility collection, thereby benefitting other ratepayers.

4 **Q. For whom are you testifying in this proceeding?**

5 A. I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
6 Efficiency in Pennsylvania (“CAUSE-PA”).

7 **Q. Please state the purpose of your Direct Testimony.**

8 A. The purpose of my testimony is to address issues presented by the Joint Petition of
9 Metropolitan Edison Company (Met-Ed), the Pennsylvania Electric Company (Penelec), the
10 Pennsylvania Power Company (Penn Power), and the West Penn Power Company (West Penn)
11 (collectively, the Companies, FirstEnergy, or FE) for Approval of its Default Service Programs for
12 the Period of June 1, 2023 through May 31, 2027, and the manner in which residential and low
13 income consumers interact with the retail market through various programs and policies proposed
14 by FirstEnergy.

15 Specifically, in section I, I will provide an overview of FirstEnergy’s filing. In section II,
16 I will provide a data-driven assessment of residential shopping as a whole, and more specifically,
17 the shopping experience of low income customers. In sections III-V, I will separately address
18 FirstEnergy’s Customer Assistance Program (CAP) shopping proposal, Time of Use (TOU) rate
19 proposal, and Customer Referral Program (CRP) proposal. In section V, I will respond to
20 FirstEnergy’s proposed Third-Party Data Access Tariff. Finally, in section VI, I will provide a
21 comprehensive summary of my findings and recommendations.

1 **I. SUMMARY OF DEFAULT SERVICE PROPOSALS**

2 **Q: Please summarize FirstEnergy’s DSP proposals.**

3 A: FirstEnergy filed this DSP proceeding in accordance with its responsibilities as a Default
4 Service Provider pursuant to Pennsylvania’s Electricity Generation Customer Choice and
5 Competition Act, 66 Pa. C.S. § 2891 *et seq.* (the “Competition Act”), as amended by Act 129 of
6 2008 (“Act 129”); the Commission’s default service regulations found at 52 Pa. Code §§ 54.181-
7 54.189; and the Commission’s Policy Statement on Default Service at 52 Pa Code §§ 69.1801-
8 1817. Specifically, FirstEnergy is obligated to provide electric generation service to all customers
9 within its service territory who do not select a retail electric generation supplier (“EGS”) or who
10 chose to return to default service at the conclusion of a contract for generation service, or when
11 the EGS providing electric generation is unable or unwilling to continue to serve the customer.
12 Through its Joint Petition, FirstEnergy seeks to establish the terms and conditions under which it
13 will procure default service supply, provide default service to non-shopping customers, and satisfy
14 the requirements of the Alternative Energy Portfolio Standards Act. FirstEnergy is proposing a
15 four-year term for its DSP VI programs. For its residential class, FirstEnergy proposes to procure
16 energy through staggered 12- and 24-month term contracts – with the exception of a proposed
17 long-term solar procurement contract, which will support one or more in-state solar projects and
18 is projected to fulfill 32% of FirstEnergy’s solar requirements under the Alternative Energy
19 Portfolio Standards (AEPS).¹ Following an internal assessment of default service price adjustment
20 schedules, which found that a longer schedule helps to promote price stability, FirstEnergy is

¹ FE Joint Petition at 8-9, para. 15-16.

1 proposing to move to a six-month default service adjustment schedule rather than its current
2 quarterly adjustment schedule.²

3 **Q: Do you support FirstEnergy’s proposal to move to a six-month default service**
4 **adjustment schedule?**

5 A: Yes. I agree with FirstEnergy’s witnesses Dr. James D. Reitzes and Dr. Nicholas E. Powers
6 that a longer adjustment timeframe will help improve price stability for residential consumers.³

7 **Q: Is FirstEnergy proposing any alternative default service rate structures for**
8 **residential consumers?**

9 A: Yes, FirstEnergy is proposing an optional Time of Use (TOU) rate for residential default
10 service customers.

11 **Q: Does FirstEnergy propose any additional programs related to the provision of default**
12 **service or residential customer shopping?**

13 A: Yes. FirstEnergy proposes to continue its current Customer Referral Program (CRP),
14 Purchase of Receivables (POR) Program, and CAP shopping program without material revisions.

15 **Q: Is FirstEnergy proposing any other significant changes?**

16 A: Yes. Citing increased requests from third parties for customer data, FirstEnergy is
17 proposing changes to its tariff to permit third parties to access both aggregate and customer-
18 specific “usage and usage-related data.”

19 **Q: Do you have concerns about FirstEnergy’s DSP V proposals?**

20 A: Yes. I am concerned that FirstEnergy’s CAP shopping, TOU, CRP, and third-party data
21 access proposals do not provide an adequate level of consumer protection and will expose

² Id. at 16, para. 37.

³ FE St. 4 at 16-17.

1 FirstEnergy’s residential consumers – especially those with limited economic means – to financial
2 and other hardships.

3 As I will explain in detail below, data revealed through discovery in this proceeding shows
4 a disturbing and prolonged pattern of excessive pricing in the competitive residential retail electric
5 market.

- 6 • Between August 2017 and December 2021, FirstEnergy’s residential shopping customers were
7 charged over **\$431 million** in excess of the applicable default service price.⁴
8
- 9 • In December 2021, FirstEnergy’s confirmed low income shopping customers were charged
10 over \$1.1 million in excess of the applicable default service price.⁵
11
- 12 • Between July 2017 and December 2021, shopping customers enrolled in FirstEnergy’s CAP
13 were charged nearly \$9.2 million in excess of the applicable default service price.
14
- 15 • Between June 2019 and December 2021, following implementation of FirstEnergy’s CAP
16 shopping rules, CAP shopping customers were charged **\$4,022,308.41** in excess of the default
17 service price, causing harm to both CAP customers and other residential ratepayers.

18 These excessive energy charges are having a direct impact on the rate of payment troubled
19 accounts and involuntary termination rates, which in turn increases residential write-offs and
20 ultimately impacts the price that all consumers pay for home energy services. In 2021:

- 21 • 2.3% of residential shopping customers were “payment troubled” – compared to just 1.52% of
22 residential customers who did not shop.⁶
23
- 24 • 4% of residential shopping customers were involuntarily terminated for non-payment –
25 compared to 2.8% of residential customers who did not shop.⁷
26
- 27 • 9.4% of CAP shopping customers were “payment troubled”– compared to 1.8% of CAP
28 customers who did not shop.⁸
29

⁴ CAUSE-PA Exhibit 1.

⁵ CAUSE-PA Exhibit 2.

⁶ CAUSE-PA Exhibit 5(a). A customer is considered “payment troubled” if they have broken one or more prior payment arrangements in a given year. 2020 Universal Service Report at 10.

⁷ CAUSE-PA Exhibit 6(a).

⁸ CAUSE-PA Exhibit 5(b).

- 1 • 29.5% of CAP shopping customers were involuntarily terminated for non-payment – compared
2 to 8.8% of CAP customers who did not shop.⁹
3
- 4 • The average write-off for FirstEnergy’s residential shopping customer accounts was \$1,204.99
5 – compared to \$767.27 for FirstEnergy’s residential default service customer accounts. *A*
6 *difference of \$437.72.*¹⁰
7
- 8 • The average write-off for FirstEnergy’s confirmed low income shopping customer accounts
9 was \$1,660.76 – compared to \$1,212.43 for FirstEnergy’s confirmed low income default
10 service customer accounts. *A difference of \$448.33.*¹¹
11
- 12 • The average write-off in for FirstEnergy’s CAP shopping customer accounts was \$1,876.11 –
13 compared to \$1,038.69. *A difference of \$837.42.*¹²
14

15 In 2019, FirstEnergy implemented changes to its CAP to prohibit suppliers from charging
16 rates in excess of the default service price, which it is proposing to continue in the context of this
17 proceeding without amendment. But the data is undeniable: CAP shopping customers continue to
18 pay rates above the default service price and those program changes have failed in their goal to
19 curtail excess pricing. FirstEnergy’s CAP shopping rules do not prevent financial harm to
20 FirstEnergy’s CAP customers – and the residential customers who support universal service
21 programs through rates. Critical changes are necessary to FirstEnergy’s default service programs
22 and policies to help prevent ongoing and acute financial harm to FirstEnergy’s residential and low
23 income customers.

⁹ CAUSE-PA Exhibit 6(b).

¹⁰ CAUSE-PA Exhibit 4(a).

¹¹ CAUSE-PA Exhibit 4(b).

¹² CAUSE-PA Exhibit 4(c).

1 **II. OVERVIEW OF SHOPPING DATA**

2 **Q: You note above that residential shopping customers across the four FirstEnergy**
3 **Companies have been charged hundreds of millions of dollars more than the default service**
4 **price since 2017. Please explain.**

5 A: Residential shopping data in this proceeding shows that, between August 2017 and
6 December 2021, FirstEnergy’s residential shopping customers, as a whole, were charged over
7 \$431 million more than the applicable default service rate.¹³ Table 1, below, provides a breakdown
8 of the charges by year and by Company. This analysis accounts for all residential shopping charges
9 – including charges for shopping customers who may have saved and those who did not save.

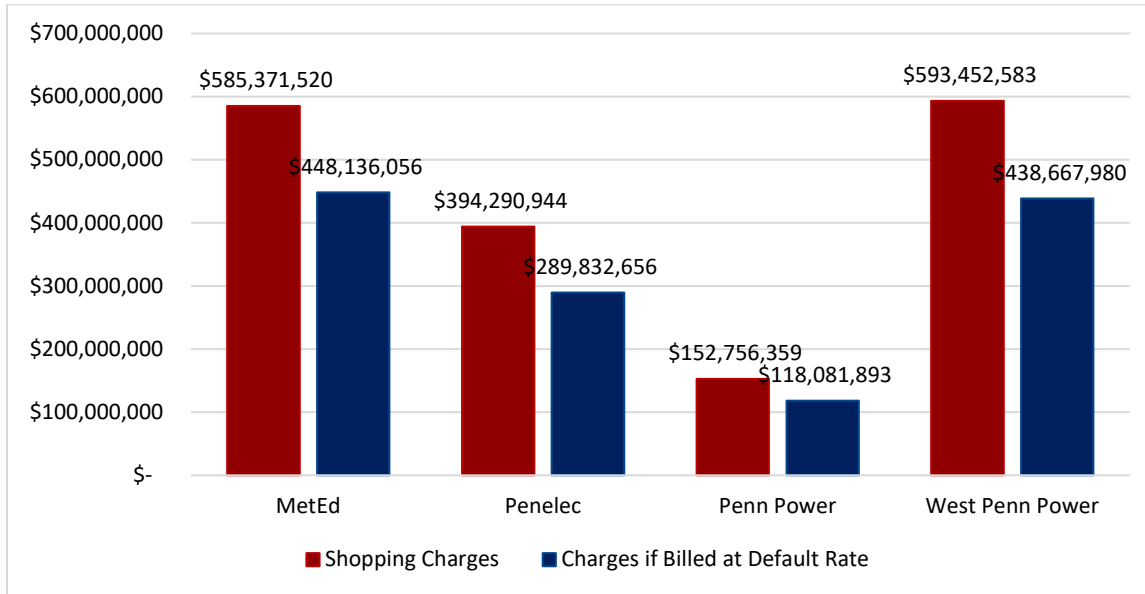
10 **TABLE 1: Residential Shopping – Total Charges Over Default Service Price, August 2017**
11 **to December 2021¹⁴**

	Met-Ed	Penelec	Penn Power	West Penn Power	Total Over Default Service Price Across All Companies
2017 (Aug - Dec)	\$11,895,065	\$9,457,447	\$3,239,881	\$8,831,165	\$33,423,558
2018	\$27,853,794	\$21,179,501	\$6,913,754	\$29,085,241	\$85,032,291
2019	\$33,176,270	\$24,579,074	\$7,957,474	\$33,915,291	\$99,628,108
2020	\$34,260,190	\$23,262,163	\$7,975,362	\$38,267,078	\$103,764,793
2021	\$30,050,145	\$25,980,103	\$8,587,995	\$44,685,829	\$109,304,071
Total	\$137,235,464	\$104,458,288	\$34,674,466	\$154,784,604	\$431,152,822

12
¹³ CAUSE-PA Exhibit 1.

¹⁴ Id. Note that all figures are rounded to whole numbers.

1 **CHART 1: Residential Shopping – Total Shopping Charges vs. Charges if Billed at Default**
 2 **Rate, August 2017 to December 2021¹⁵**



3
 4 Chart 1 shows the total charges billed to residential shopping customers from August 2017
 5 through December 2021, compared to the rates those customers would have paid if they remained
 6 on default service. As this chart illustrates, residential shopping customers paid a 31% price
 7 premium in MetEd service territory; a 36% price premium in Penelec service territory; a 29% price
 8 premium in Penn Power service territory; and a 38% price premium in West Penn Power service
 9 territory.

10 As extensively detailed in CAUSE-PA Exhibit 1, taken as a group, residential shopping
 11 customers in each of the FirstEnergy Companies were charged rates in excess of the default service
 12 price in *each and every month* since August 2017. In other words, across all four of the FirstEnergy
 13 Companies, *residential shopping customers – as a group – have not saved at any point since at*
 14 *least August 2017.*

¹⁵ CAUSE-PA Exhibit 1(a)-(d).

1 **Q: You also noted above that, on a per-customer basis, residential shopping customers**
2 **were charged hundreds of dollars more than the default service price in 2021. Please explain.**

3 A: From August 2017 to December 2021, residential shopping customers were charged
4 between \$982.35 (MetEd) and \$1,091.79 (West Penn Power) in excess of the default service
5 price.¹⁶ As demonstrated in Table 2 and Chart 1, below, the amount residential consumers are
6 paying for competitive supply in excess of the default service price is trending upward each year.

7 **TABLE 2: Residential Shopping - Average Per Customer Charges in Excess of Default**
8 **Service Price, August 2017 to December 2021¹⁷**

	MetEd	Penelec	Penn Power	West Penn Power
2017 (Aug - Dec)	\$70.53	\$64.73	\$84.24	\$52.64
2018	\$180.01	\$158.29	\$192.72	\$184.95
2019	\$233.80	\$201.09	\$234.73	\$230.56
2020	\$253.64	\$198.67	\$241.19	\$271.32
2021	\$244.37	\$245.03	\$287.93	\$352.32
TOTAL	\$982.35	\$867.81	\$1,040.81	\$1,091.79

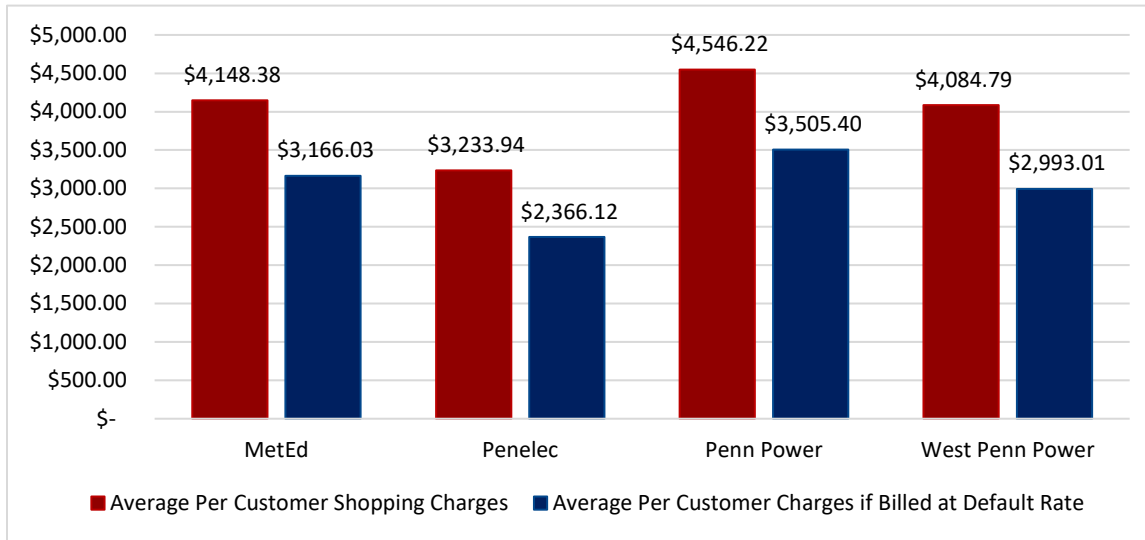
9
10 Chart 2 illustrates the per-customer financial impact on residential shopping customers
11 across the FirstEnergy Companies, and shows the difference between the actual average per-
12 customer shopping charges (August 2017 to December 2021) and the average per-customer
13 charges those customers would have incurred at the default service rate.¹⁸

¹⁶ CAUSE-PA Exhibit 1.

¹⁷ Id.

¹⁸ CAUSE-PA Exhibit 1(a)-(d).

1 **CHART 2: Residential Shopping - Average Charges Per Residential Shopping Customer vs.**
2 **Average Charges if Billed at Default Service Rate, August 2017 to December 2021¹⁹**



3

4 **Q: Please explain how you reached the conclusion that FirstEnergy’s residential**
5 **shopping customers have consistently paid more than the default service price since 2017?**

6 **A:** In response to discovery, FirstEnergy provided information about the overall charges billed
7 to residential consumers for generation supply service and the total kWh used by these customers.
8 With simple division, subtraction, and multiplication, I was able to calculate the average per kWh
9 rate charged to residential shopping customers each month, across all four Companies.

10 Once I arrived at the average kWh price charged to residential shopping customers each
11 month, I was able to compare that rate to the applicable default service price. This comparison
12 showed the amount per kWh that residential shopping customers paid in excess of the default
13 service price in any given month. From there, I multiplied the price per kWh in excess of the
14 default service rate by the monthly shopping customer usage to arrive at the total monthly dollar
15 amount charged to residential shopping customers in excess of the default service price.

¹⁹ CAUSE-PA Exhibit 1.

1 Finally, to arrive at the average cost that an individual residential shopping customer paid
 2 in excess of the default service price, I divided the total charges in excess of the default service
 3 price by the total number of residential shopping customers in each month.

4 **Q: You noted at the outset of your testimony that low income customers are also**
 5 **impacted by the financial harm associated with high supplier pricing. Please explain.**

6 A: In a single month, December 2021, FirstEnergy’s confirmed low income customers were
 7 charged a total of \$1,149,327.89 in excess of the applicable default service price.²⁰ By company,
 8 on an average per-customer basis, confirmed low income shopping customers were charged
 9 between \$46.17 and \$60.71 in excess of the default service price.

10 **TABLE 3: Confirmed Low Income (Non-CAP) Customer Shopping – December 2021²¹**

DECEMBER 2021	Avg \$/kWh, Shopping Rate	Average Over Default Service Per kWh	Average Over Default Service Per CLI Customer	Total Over Default
MetEd	\$0.1209	\$0.0468	\$46.76	\$328,673.71
Penelec	\$0.1257	\$0.0606	\$48.08	\$369,460.32
Penn Power	\$0.1270	\$0.0511	\$46.17	\$77,052.78
West Penn Power	\$0.1153	\$0.0583	\$60.71	\$374,141.08
TOTAL				\$1,149,327.89

11 **Q: Why did you exclude low income customers enrolled in CAP from your analysis of**
 12 **confirmed low income shopping charges?**

13 Low income customers enrolled in FirstEnergy’s Customer Assistance Program (CAP)
 14 were excluded from the above analysis of confirmed low income shopping because CAP customers
 15 are subject to special shopping rules that restrict the price a supplier may charge to the applicable

²⁰ Note that the number of “confirmed low income customers” in FirstEnergy’s service territory is not representative of the total number of actual low income customers across the four Companies. FirstEnergy determines its “confirmed low income customers” only from those customers who self-report income to the Companies, or who are active participants in CAP or LIHEAP. CAUSE-PA to FE I-12.

²¹ CAUSE-PA Exhibit 2. Due to the manner in which FirstEnergy tracks CLI customers, it could only provide point-in-time data for December 2021. See CAUSE-PA to FE I-7.

1 default service rate.²² These rules were approved in FirstEnergy’s last Default Service Plan
 2 proceeding to help stem the well documented financial harm to CAP customers and other
 3 residential ratepayers caused when suppliers charge CAP customers rates higher than the default
 4 service price.²³ However, notwithstanding the implementation of CAP shopping restrictions in
 5 June 2019, FirstEnergy’s low income CAP shopping customers have continued to be charged
 6 millions of dollars more than the applicable default service rate. I will analyze FirstEnergy’s CAP
 7 shopping rules, and the inadequacy of these restrictions below in Section III, but provide a brief
 8 overview of that ongoing financial harm here.

9 From July 2017 to December 2021, CAP shopping customers were charged nearly \$9.2
 10 million in excess of the applicable default service price.²⁴

11 **TABLE 4: CAP Customer Shopping, Total Charges in Excess of Default Service Price²⁵**

	MetEd	Penelec	Penn Power	West Penn Power	Average Over Default Across All Companies
Jul-Dec 2017	\$349,847.18	\$400,167.62	\$92,056.55	\$553,412.80	\$1,395,484.15
2018	\$726,690.10	\$728,971.07	\$138,226.95	\$1,176,852.98	\$2,770,741.10
2019	\$467,384.84	\$567,405.98	\$116,821.77	\$630,089.80	\$1,781,702.39
2020	\$420,313.42	\$391,000.02	\$99,943.27	\$520,727.80	\$1,431,984.51
2021	\$454,575.75	\$527,783.93	\$115,008.46	\$674,572.53	\$1,771,940.67
TOTAL	\$2,418,811.29	\$2,615,328.62	\$562,057.00	\$3,555,655.91	\$9,151,852.82

12

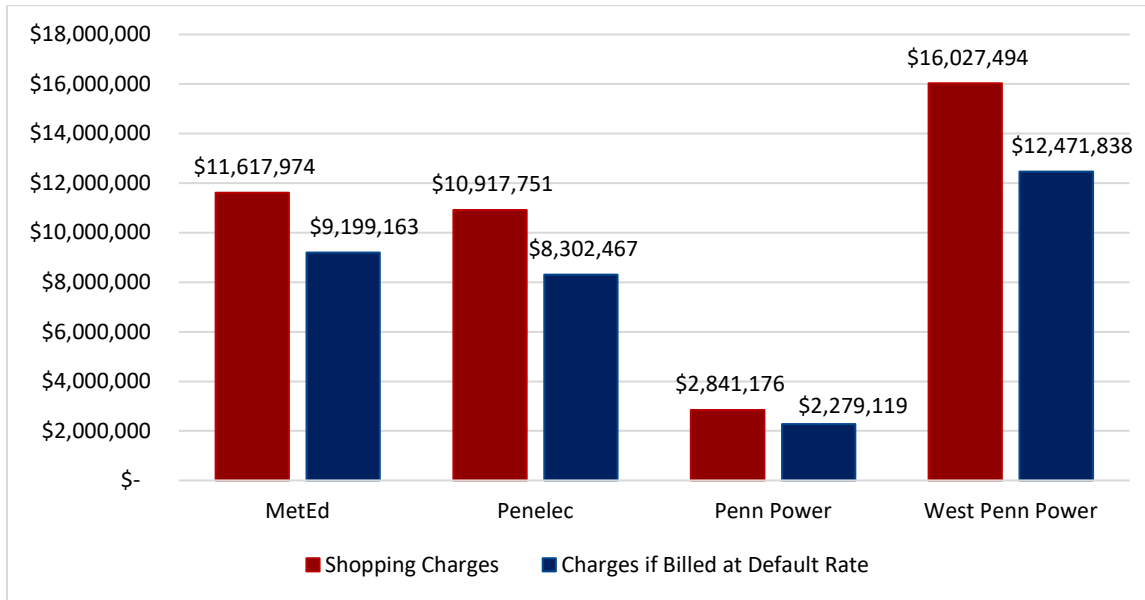
²² See infra section III, where FirstEnergy’s CAP shopping program is discussed in further detail.

²³ See Petitions of MetEd, Penelec, Penn Power, and West Penn Power for Approval of a Default Service Program Beginning June 1, 2019 through May 31, 2023, Final Order, Docket Nos. P-2017-2637855, -57, -58, -66 (order entered Feb. 28, 2019).

²⁴ CAUSE-PA Exhibit 3.

²⁵ Id.

1 **CHART 3: CAP Shopping – Total Shopping Charges vs. Charges if Billed at Default Rate,**
 2 **August 2017 to December 2021**²⁶



3
 4 Since June 2019, when FirstEnergy’s CAP shopping restrictions were implemented, CAP
 5 shopping customers have nevertheless been charged nearly \$4 million in excess of the applicable
 6 default service price – causing continued financial harm to low income CAP customers and other
 7 residential ratepayers who pay for the program through rates.²⁷

8 **TABLE 5: CAP Customer Shopping, Total Charges in Excess of Default Service Price Since**
 9 **Implementation of CAP Shopping Restrictions (June 2019 to December 2021)**²⁸

MetEd	\$1,107,860.30
Penelec	\$1,147,910.33
Penn Power	\$278,010.85
West Penn Power	\$1,411,301.14
Total in Excess of Default Since CAP Shopping Rules Implemented	\$3,945,082.62

²⁶ CAUSE-PA Exhibit 3(a)-(d). Note that figures in this chart rounded to whole numbers.

²⁷ CAUSE-PA Exhibit 3.

²⁸ Id.

1 On an average per customer basis, CAP shopping customers face substantially higher
2 monthly charges than non-shopping CAP customers. In 2021 alone, CAP shopping customers
3 across the FirstEnergy Companies were charged on average of between \$248.52 (Penelec) and
4 \$367.18 (West Penn Power) more than the default service price.²⁹ These are charges that CAP
5 customers are categorically unable to afford.³⁰ From July 2017 to December 2021, CAP shopping
6 customers have paid on average – per customer – a total of between \$823.74 (Penelec) and
7 \$1,115.86 (West Penn Power) in excess of the default service price.³¹

8 **TABLE 6: CAP Shopping – Avg. Per Customer Charges in Excess of Default Service Price³²**

	MetEd	Penelec	Penn Power	West Penn Power
Jul-Dec 2017	\$77.51	\$72.67	\$84.11	\$72.13
2018	\$184.35	\$150.61	\$143.17	\$202.54
2019	\$196.98	\$176.87	\$191.76	\$214.84
2020	\$247.76	\$175.07	\$229.01	\$259.17
2021	\$274.20	\$248.52	\$281.68	\$367.18
TOTAL	\$980.80	\$823.74	\$929.73	\$1,115.86

9

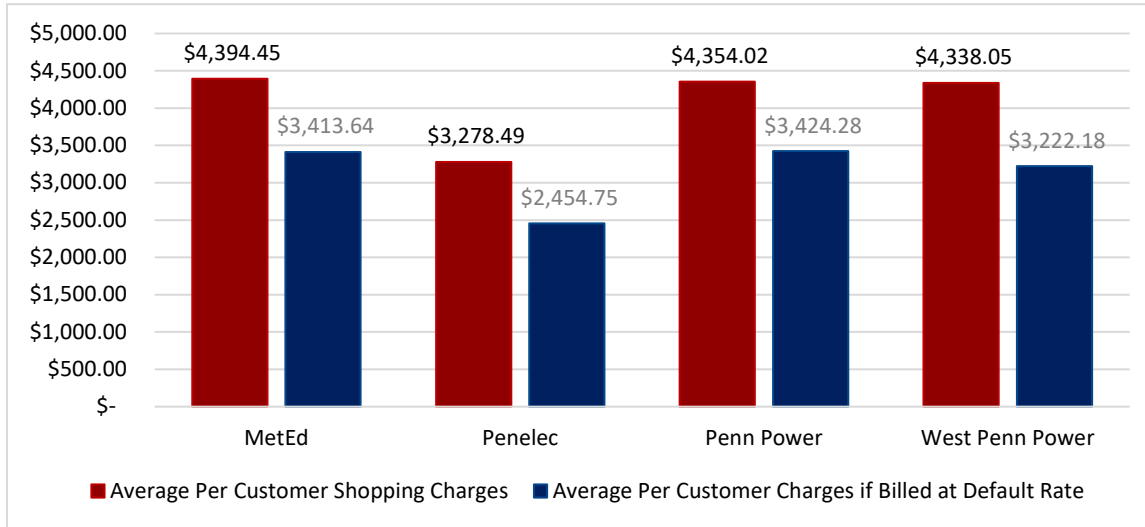
²⁹ CAUSE-PA Exhibit 3(a)-(d).

³⁰ See infra Section III.

³¹ CAUSE-PA Exhibit 3(a)-(d).

³² CAUSE-PA Exhibit 3.

1 **CHART 4: CAP Shopping - Average Charges Per CAP Shopping Customer vs. Average**
 2 **Charges if Billed at Default Service Rate, August 2017 to December 2021³³**



3
 4 As I explain more thoroughly below, in Section V of my testimony, low income households
 5 struggle profoundly to make ends meet – often foregoing basic life necessities to afford energy
 6 services to their home. Through the pandemic, residential consumers – especially low income
 7 workers – have suffered profound loss of wages, increased basic service costs, and historic levels
 8 of housing and utility debts.³⁴ An unnecessary increase in basic utility costs, such as those faced
 9 by confirmed low income shopping customers, exacerbates unaffordability, increases uncollectible
 10 expenses, and results in significant impacts to the health and safety of low income consumers.

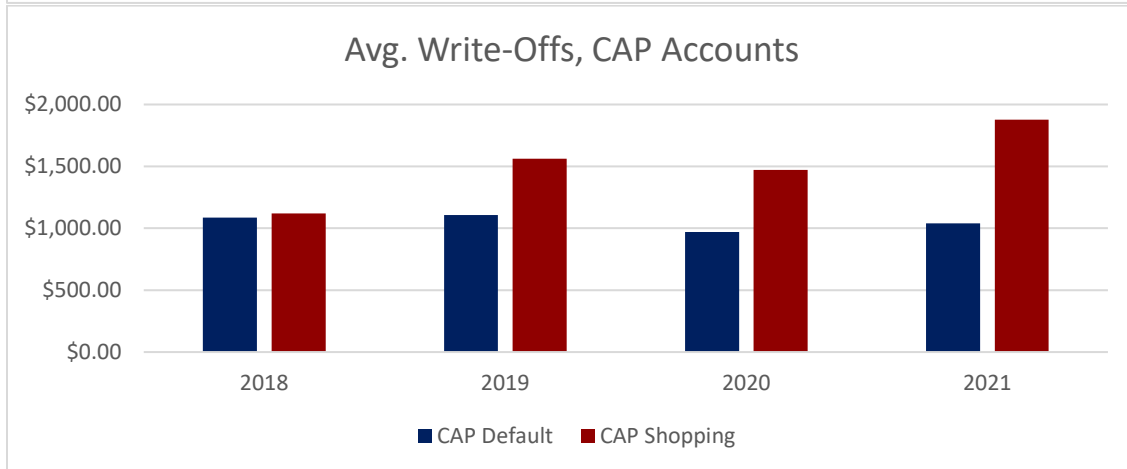
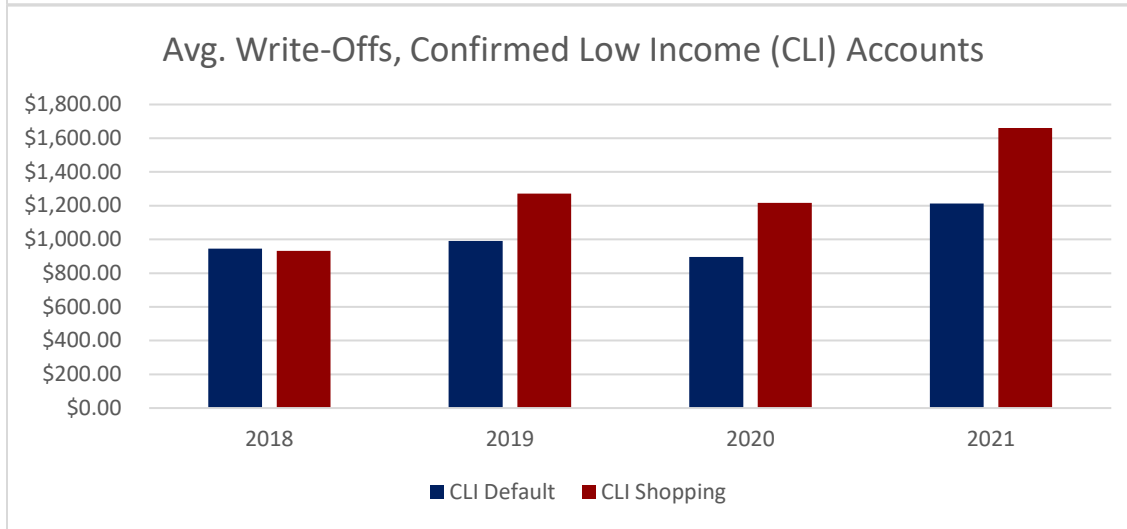
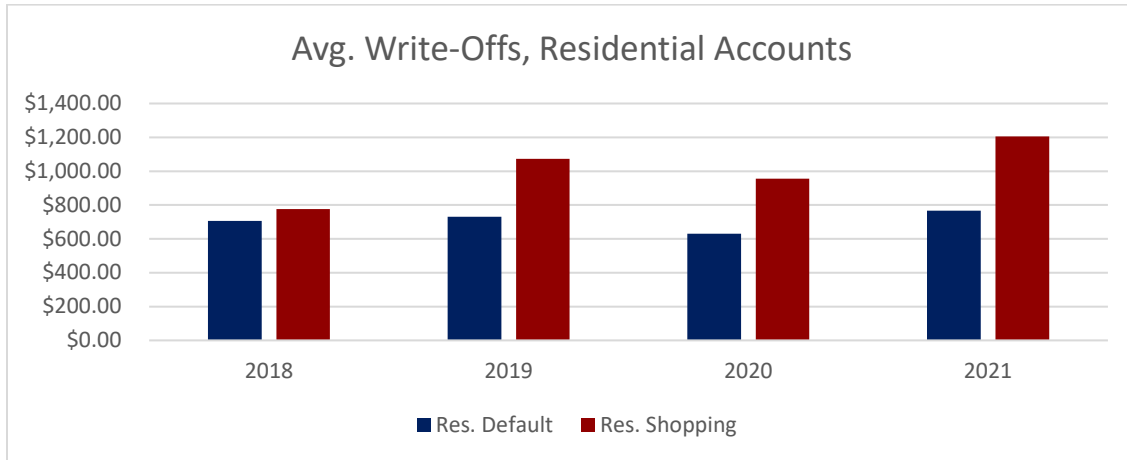
11 **Q: Is there any proof that residential shopping increases uncollectible expenses?**

12 A: Yes. CAUSE-PA Exhibit 4 provides an analysis of residential, confirmed low income, and
 13 CAP customer write-offs. This Exhibit demonstrates that the average account write-off for
 14 shopping customers greatly exceeds the average account write-off for default service customers.

³³ CAUSE-PA Exhibit 1.

³⁴ See Public Utility Service Termination Moratorium, Pa. PUC Docket No. M-2020-3019244 (periodic reports on arrearage, at-risk accounts, and terminations).

1 **Chart 5: Average Account Write-Offs, Residential, Confirmed Low Income, and CAP³⁵**



³⁵ CAUSE-PA Exhibit 4.

1 **Q: FirstEnergy is proposing to continue imposing a “clawback” mechanism for its**
2 **Purchase of Receivables Program to offset the increased write-off expense associated with**
3 **high residential supplier charges.³⁶ Does this “clawback” mechanism address the disparity**
4 **in uncollectible expenses between default service and shopping customers?**

5 A: The clawback mechanism helps to reduce (*but does not fully remediate*) the disparity in
6 residential write-offs between shopping and default service accounts. FirstEnergy’s Purchase of
7 Receivables (POR) program typically pays suppliers for 100% of the suppliers’ charges – dollar
8 for dollar. The clawback offsets this 100% POR rate when suppliers meet two prongs:

9 The first prong identifies those EGSs in the POR program whose average percentage
10 of write-offs as a percentage of revenues over a twelve-month period exceed 200%
11 of the average percentage of the total EGS write-offs as a percentage of revenues
12 per operating company. The second prong of the test identifies those EGSs
13 identified under the first prong whose average price charged over the same twelve-
14 month period exceed 150% of the operating company average PTC for the period.³⁷

15 In other words, the first prong of the two-part clawback test is measured against other EGSs – not
16 against write-offs for default service.

17 Thus, while the clawback mechanism acts to ameliorate the Companies’ write-offs, it does
18 not address or alleviate the financial harm to the specific shopping customers who incur the highest
19 prices, are subject to collections activities and associated fees, and ultimately face termination of
20 service to their home before those debts are written off and recovered through rates. As I discuss
21 further in section III, below, termination of energy services to a home often results in serious
22 consequences to health and safety of the family, disrupts family unity, and destabilizes housing for
23 families over the long term – impacting the health and welfare of the entire community.³⁸

³⁶ (FE Joint Pet. at 22-23, FE St. 1 at 12-16).

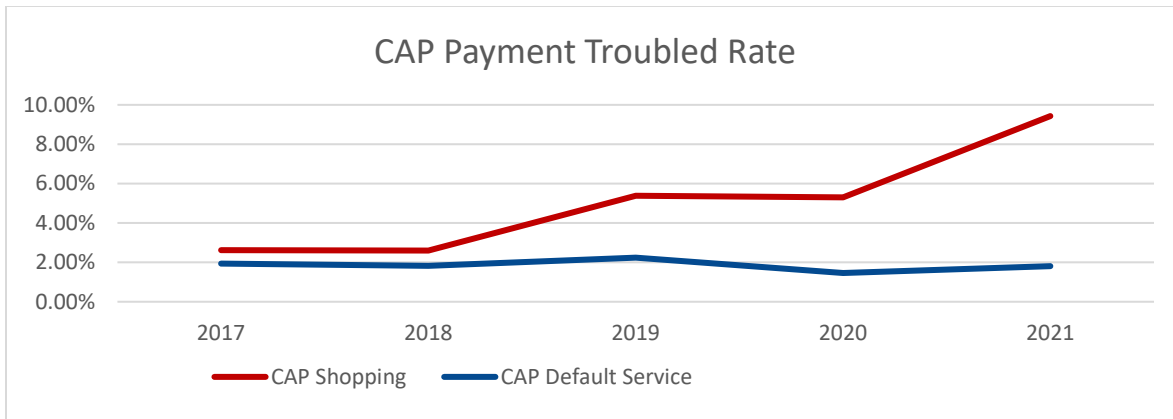
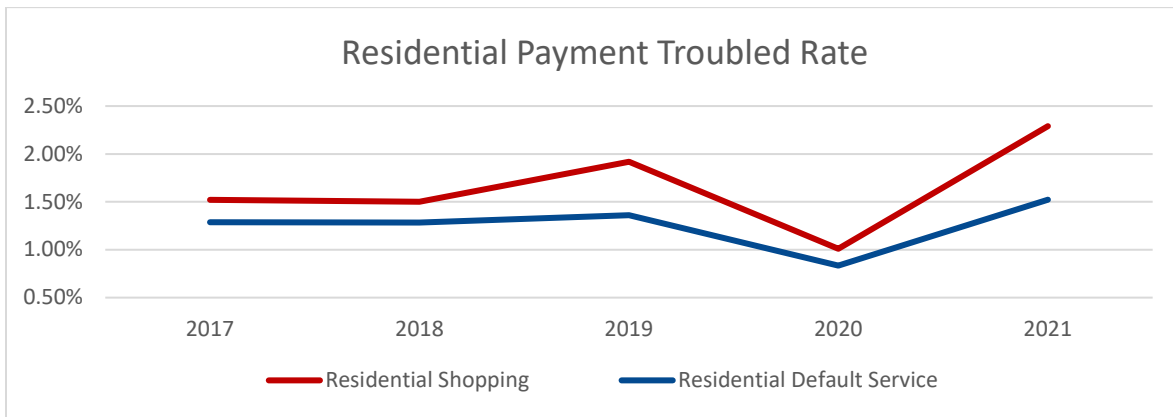
³⁷ FE St. 1 at 14.

³⁸ See *infra* section III.

1 **Q: Is there any data to suggest that shopping customers are at a greater risk of**
2 **termination compared to default service customers?**

3 Yes. I compared default service and shopping account data for payment troubled accounts and
4 account terminations for both residential and CAP customers. Payment trouble and termination
5 rates are higher for both residential and CAP shopping customers compared to default service
6 customers.

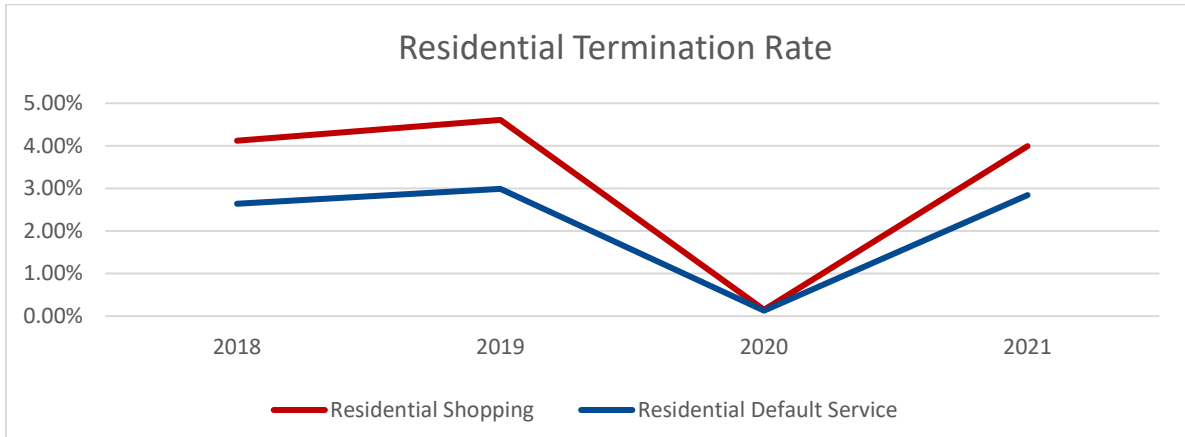
7 **CHART 6: Payment Troubled Rates, Default Service vs. Shopping³⁹**



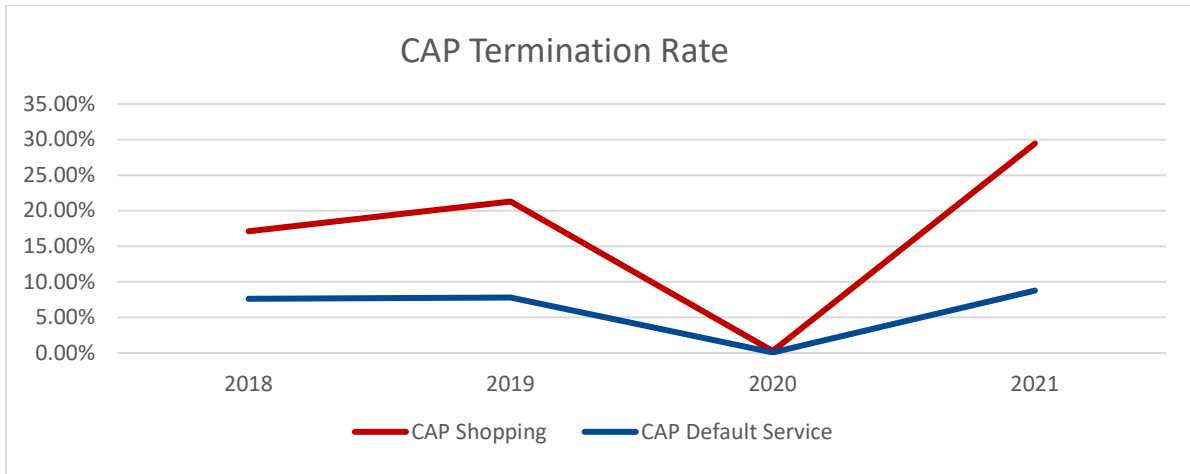
³⁹ CAUSE-PA Exhibit 5.

1 Disparities in termination rates are particularly stark for FirstEnergy’s CAP customers. In
2 2021, CAP shopping customers were terminated at a rate of 29.45% across all four Companies –
3 while CAP customers with default service were terminated at a rate of 8.77%.⁴⁰

4 **CHART 7: Termination Rates, Default Service vs. Shopping⁴¹**



5



6

7 Note that there were very few terminations in 2020 due to the emergency COVID-19
8 moratorium.⁴²

⁴⁰ CAUSE-PA Exhibit 6.

⁴¹ Id.

⁴² See Public Utility Service Termination Moratorium, Order, Docket No. M-2020-3019244 (order entered Mar. 11, 2021).

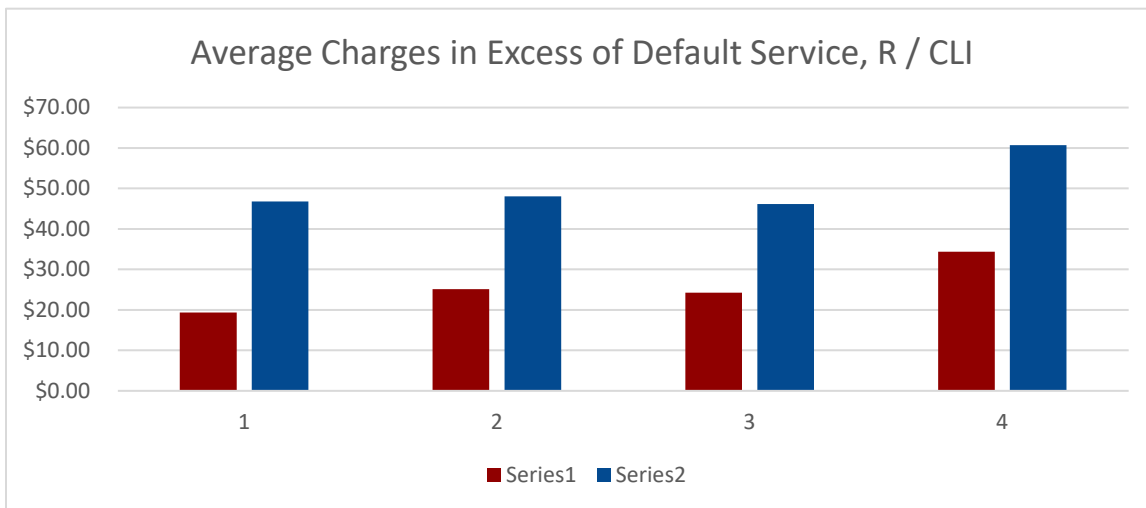
1 **Q: Are low income shopping customers charged higher rates compared to residential**
 2 **shopping customers?**

3 A: Yes. The data explored above shows that low income shopping customers are often
 4 charged higher rates, on average, compared to residential shopping customers as a whole. In
 5 December 2021, the average shopping prices in excess of the default service price were
 6 substantially higher for confirmed low income (CLI) shopping customers compared to general
 7 residential shopping customers.⁴³

8 **TABLE 7: Avg. Per-Customer Shopping Charges in Excess of Default Service Price** ⁴⁴

DECEMBER 2021	MetEd	Penelec	Penn Power	West Penn
Residential	\$19.33	\$25.15	\$24.24	\$34.40
Confirmed Low Income	\$46.76	\$48.08	\$46.17	\$60.71

9 **CHART 8: Avg. Per-Customer Shopping Charges in Excess of Default Service Price –**
 10 **December 2021**⁴⁵



12

⁴³ CAUSE-PA Exhibits 1, 2, & 3.

⁴⁴ Id.

⁴⁵ Id.

1 **III. CUSTOMER ASSISTANCE PROGRAM (CAP) SHOPPING**

2 **Q: Does FirstEnergy have a significant low income population in its service territory?**

3 A: Yes. Based on census data, as a percentage of FirstEnergy’s customer base, FirstEnergy
 4 has an estimated 455,617 low income customers in its service territory – roughly half (258,436) of
 5 which were “confirmed low income.”⁴⁶ FirstEnergy also has a significant number of customers
 6 actively enrolled in CAP. As of December 31, 2020, FirstEnergy had a CAP enrollment of
 7 72,792.⁴⁷ These customers have already demonstrated payment difficulty and an inability to afford
 8 their electric service without assistance. Table 8 provides a quick glance at the metrics for
 9 FirstEnergy’s low income customer population in 2020, the most recent year for which this data
 10 was publicly reported by the Commission, as compared to its CAP participation rates.

11 **Table 8 – FirstEnergy Low Income Population and CAP Participation⁴⁸**

Company	Number of Confirmed Low-Income Customers	Percentage of Customers who are Confirmed Low-Income Customers	Estimated Number of Low-Income Customers	Percentage of Customers who are Estimated to be Low-Income	Number of Active CAP Customers as of 12/31/20
MetEd	73,106	14.4%	113,660	22.3%	19,310
Penelec	90,218	18%	151,836	30.3%	25,345
Penn Power	19,902	13.5%	35,146	23.9%	5,546
West Penn	75,210	11.9%	154,975	24.6%	22,591
TOTAL	258,436		455,617		72,792

12 Importantly, in light of the ongoing pandemic, and the unprecedented economic and job
 13 losses that have occurred over the two years, the number of low income households in
 14 FirstEnergy’s service territory has likely increased precipitously. While the economy is showing

⁴⁶ See 2020 Universal Service Report at 6,8.

⁴⁷ Id. FirstEnergy includes customers who self-report income or who have verified income through participation in CAP or LIHEAP in its confirmed low income customer counts. CAUSE-PA to FE I-12.

⁴⁸ 2020 Universal Service Report at 6, 8, 57.

1 signs of recovery, low wage workers and individuals with fixed income continue to experience
2 profound economic distress as the cost of basic goods and services continues to inflate.⁴⁹

3 **Q: What is the income threshold to be considered “low income”?**

4 A: The Commission generally considers households to be “low income” if their total gross
5 household income is at or below 150% of the federal income poverty guidelines (FPIG). Table 9
6 provides a breakdown of income levels for 2- and 4-person households at 50, 100, and 150% FPIG.

7 **TABLE 9: Federal Income Poverty Guidelines, 2022⁵⁰**

	2-Person Household	4-Person Household
50% FPIG	\$9,155	\$13,875
100% FPIG	\$18,310	\$27,750
150% FPIG	\$27,465	\$41,625

8
9 The average annual income of a household enrolled in CAP in 2020 was just \$14,292.⁵¹

10 **Q: Is home energy affordability a serious issue for FirstEnergy’s low-income customers?**

11 A: Yes, very serious. Energy insecurity – or the inability to afford basic energy services –
12 threatens stable and continued housing, employment, and education; has substantial and long-term
13 impacts on mental and physical health; creates serious risks to the household and the larger
14 community; and negatively impacts the greater economy.⁵² Even in relatively good economic
15 periods, low-income families struggle to make ends meet each month, and are often unable to

⁴⁹ Ctr. On Budget & Policy Priorities, Tracking the COVID-19 Economy’s Effects on Food, Housing and Employment Hardships (updated Feb. 2022), <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-economys-effects-on-food-housing-and-employment-hardships>.

⁵⁰ US Dept’t Health & Human Services, HHS Poverty Guidelines for 2022, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

⁵¹ 2020 Universal Service Report at 48.

⁵² See Diana Hernandez, Understanding Energy Insecurity and Why It Matters to Health, 167 Soc. Science Medicine (Oct. 2016), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5114037/>; see also Diana Hernandez, Yumiko Aratani, and Yang Jiang, Energy Insecurity Among Families with Children (Jan. 2014), http://www.nccp.org/publications/pub_1086.html.

1 afford basic energy services. These households are often forced to choose between critical
2 necessities each month, including housing, food, water, heat, and medicine.⁵³

3 Even with financial assistance, low-income households are often still unable to afford the
4 cost of energy: According to a 2018 survey conducted by the National Energy Assistance
5 Directors' Association, 72% of LIHEAP recipients reported that they forego other necessities to
6 afford energy, and 26% reported keeping their home at unsafe or unhealthy temperatures.⁵⁴ Indeed,
7 as recent research and data has continually and repeatedly showed, many vulnerable low-income
8 and minority families simply cannot afford the cost of energy services.

9 The COVID-19 pandemic put a bright spotlight on the importance of stable energy services
10 to a home, and the severe consequences to the health and safety of a household – and the broader
11 community – when a household is energy insecure. Researchers from Duke University, published
12 in the National Bureau of Economic Research, estimate that utility moratoria established
13 nationwide in response to the COVID-19 pandemic reduced COVID-19 cases by 4.4%, and
14 reduced deaths from the disease by 7.4%.⁵⁵ These researchers concluded that if utility moratoria
15 were in place across the country from March 2020 through November 2020, we could have reduced
16 COVID-19 infection rates by 8.7% and deaths by 14.8% nationwide.⁵⁶

⁵³ According to the US Energy Information Administration, roughly 1 in 5 households in 2015 – when the economy was experiencing a relatively prosperous economic period – reported that they had to reduce or forego other critical necessities like food and medicine to afford their home energy costs, and more than 1 in 10 reported keeping their home at an unsafe or unhealthy temperature. See US EIA, [Residential Energy Consumption Survey](https://www.eia.gov/consumption/residential/reports/2015/energybills/) (2015), <https://www.eia.gov/consumption/residential/reports/2015/energybills/>; see also NEADA, [2018 National Energy Assistance Survey](http://neada.org/wp-content/uploads/2015/03/liheapsurvey2018.pdf), at 17, 20 (Dec. 2018), <http://neada.org/wp-content/uploads/2015/03/liheapsurvey2018.pdf> (hereinafter NEADA Survey).

⁵⁴ NEADA Survey at 17, 20.

⁵⁵ Kay Jowers, Christopher Timmins, Nrupen Bhavsar, Qihui Hu, and Julia Marshall, [Housing Precarity & the COVID-19 Pandemic: Impacts of Utility Disconnection and Eviction Moratoria on Infections and Death Across US Counties](https://www.nber.org/papers/w28394), NBER Working Paper 28394 (Jan. 2021), <https://www.nber.org/papers/w28394>.

⁵⁶ Id.

1 Ultimately, any increase in rates necessarily causes increased unaffordability for low
2 income households whose income is already inadequate to cover basic living expenses, and results
3 in a corresponding increase in uncollectible expenses and involuntary payment-related
4 terminations. These impacts can and do have a deep and lasting impact on the health and wellbeing
5 of those in the household and the welfare of the community as a whole. A 2016 report of
6 Pennsylvania’s Joint State Government Commission on Homelessness found that utility assistance
7 ranked in the top three types of assistance noted by survey respondents (24.1 percent) that would
8 have prevented homelessness.⁵⁷

9 Put simply, FirstEnergy’s confirmed low-income customers are economically vulnerable
10 and unable to pay for essential services like electricity without substantial and meaningful
11 assistance. It is precisely for this reason that Customer Assistance Programs (CAPs) were created
12 and statutorily recognized at the outset of the shopping era to assist low-income customers
13 maintain and afford utility service.

14 **Q: Please describe FirstEnergy’s CAP.**

15 A: As regulated public utilities subject to the requirements of the Public Utility Code, the
16 Companies are required by statute and regulation to offer an integrated package of universal
17 service programs designed to help low-income, payment troubled ratepayers maintain and afford
18 essential utility services. These programs are statutorily required by the Electricity Generation

⁵⁷ Joint State Government Commission, Homelessness in Pennsylvania: Causes, Impacts, and Solutions, at 112, 157, 160 (April 2016), available at http://jsg.legis.state.pa.us/publications.cfm?JSPU_PUBLN_ID=447 (“When asked if there were any services that may have prevented them from becoming homeless, the women responded overwhelmingly that assistance with past-due rent and utilities, security deposit, and first and last months’ rent would have been most beneficial.”).

1 Customer Choice and Competition Act⁵⁸ (“the Choice Act”) and Commission regulation⁵⁹, and
2 are guided by formal Commission policy.⁶⁰

3 The universal service provisions of the Choice Act tie the affordability of electric service
4 to a customer’s ability to pay for that service. The Commission has the responsibility to ensure
5 that the programs and services necessary to achieve affordability of electric service are
6 appropriately funded and available in each electric distribution territory.⁶¹ The statutory goals of
7 universal service are to be achieved through the enactment, establishment and maintenance of
8 policies, practices and services that help low-income customers maintain electric service to their
9 home. Universal service programs include special rates and alternative collections provided
10 through CAP, energy efficiency services provided through the Low Income Usage Reduction
11 Program (LIURP), service termination protections, and consumer education.⁶² For the purposes
12 of this case, I focus primarily on CAP – and the manner in which CAP interacts with the
13 competitive market. However, it is important to realize that each of the universal service programs
14 are intended to work as part of an integrated whole to allow low-income households access to an
15 affordable, safe, and reliable electric supply.

16 Generally, CAPs provide a discounted bill for payment troubled, low-income ratepayers
17 whose household incomes are at or below 150% FPIG.⁶³ CAPs also provide comprehensive
18 arrearage management assistance, which freezes a participant’s pre-CAP program arrearages and
19 allows them to earn forgiven over time by making in-full CAP payments over a period of years.

⁵⁸ See 66 Pa. C.S. §§ 2802(10), (17); 2804(9).

⁵⁹ 52 Pa. Code 54.71 *et seq.*

⁶⁰ 52 Pa. Code § 69.265.

⁶¹ 66 Pa. C.S. § 2804(9).

⁶² 66 Pa. C.S. § 2803.

⁶³ See Table 9, above.

1 The Companies’ CAP program is called the Pennsylvania Customer Assistance Program
2 (PCAP), but I refer to it throughout this testimony simply as CAP. Under the Companies’ current
3 CAP, participants pay the difference between their total monthly budget bill and their monthly
4 CAP subsidy credit, which is applied at the time of the billing.⁶⁴ The monthly budget bill is
5 calculated based on the most recent 12 months billing history (or estimated usage), divided by 12
6 to determine the average monthly bill.⁶⁵ The monthly CAP subsidy payment is determined based
7 on total gross household income, primary heating source, and energy burden – and is recalculated
8 monthly to reflect the last 12 months’ energy burden.⁶⁶ For non-electric heating accounts, the
9 benefit calculation is currently based on a 3% energy burden.⁶⁷ For electric heat accounts, the
10 benefit calculation is currently based on a 9% energy burden.⁶⁸ An example of how the monthly
11 subsidy benefit is calculated is contained within the Companies’ Universal Plans.⁶⁹ The subsidy
12 payment is subject to a maximum monthly subsidy level, which varies by Company and heating
13 type (electric heat vs. non-electric heat).

14 **TABLE 10: Maximum CAP Subsidy Credit Limit⁷⁰**

	Non-Electric Heat		Electric Heat	
	Annual	Monthly	Annual	Monthly
MetEd	\$1,090	\$90.83	\$2,670	\$222.50
Penelec	\$1,110	\$92.50	\$2,710	\$225.83
Penn Power	\$1,090	\$90.83	\$2,700	\$225.00
West Penn Power	\$1,040	\$86.67	\$2,550	\$212.50

15

⁶⁴ See MetEd, Penelec, Penn Power, & West Penn Power, Amended Joint Universal Service & Energy Conservation Plan: Program Years 2019, 2020, 2021, at 10-11 (filed June 24, 2019), <https://www.puc.pa.gov/pdocs/1625391.pdf> (filed at docket numbers M-2017-2636969, -73, -76, -78).

⁶⁵ Id. 10-11.

⁶⁶ Id. at 11.

⁶⁷ Id.

⁶⁸ Id.

⁶⁹ Id. at 11, 13.

⁷⁰ Id. at 12.

1 The intent of these calculations is that over the course of a year most CAP customers will pay no
2 more than 3% (electric, non-heating customers) or 9% (electric heating customers) of their income
3 towards their electricity bill.

4 **Q: Who pays for FirstEnergy's CAP?**

5 A: FirstEnergy's CAP is financed through a Universal Service rider, which is charged to all
6 residential ratepayers – including those enrolled in CAP.⁷¹

7 **Q: What happens if a CAP customer shops for electricity from an electric supplier?**

8 A: Because of the way the Companies' CAP is structured, if a CAP customer contracts for
9 electricity at a price that is less than the default service price, the customer will have a lower
10 monthly bill than the customer otherwise would have had if they remained on default service. In
11 turn, the subsidy credit required to reach the target energy burden levels in subsequent months
12 would also be reduced – reducing the overall cost of CAP (and the costs charged to other residential
13 ratepayers) over time.

14 However, the same principal works in reverse if a CAP customer contracts for electric
15 generation at a price higher than the applicable default service price. That is, this customer will
16 pay a monthly bill that is higher than they would have paid if they remained on default service. In
17 turn, the subsidy credit required to reach the target energy burden levels is also increased in
18 subsequent months – which increases the cost of the program and, ultimately, the amount that other
19 residential consumers pay to support the program through rates.

⁷¹ 2020 Universal Service Report at 89.

1 **Q: Are there any current rules to prevent CAP shopping customers from paying a rate**
2 **that exceeds the default service price?**

3 A: Yes. In June 2019, FirstEnergy implemented new CAP shopping rules, which were
4 approved as part of FirstEnergy’s last DSP proceeding. In short, FirstEnergy’s current CAP
5 shopping rules provide that CAP customers “may only enter a contract with an Electric Generation
6 Supplier for a rate that is at or below each FirstEnergy Company’s Price to Compare *for the*
7 *duration of the contract* and does not contain any early termination, cancellation, or other fees.”⁷²

8 The mechanics for implementation of this broad rule were determined by Commission
9 staff, with input from the parties through a subsequent collaborative proceeding – which were then
10 memorialized in a final Commission order, issued February 28, 2019.⁷³ In relevant part, these rules
11 included: ⁷⁴

- 12 • CAP shopping customers must be billed through “rate ready billing”.
- 13
- 14 • CAP shopping customers may only contract for service from a supplier “at a per-kilowatt-
15 hour price that is set at the price-to-compare or a percentage-off the price-to-compare for
16 the duration of the contract.
- 17
- 18 • FirstEnergy must reject any enrollment submitted by a supplier that exceeds the price
19 limitations.
- 20
- 21 • Suppliers “shall never charge [CAP] participants any early termination, cancellation, or
22 other fees in addition to the per-kilowatt-hour unit price.
- 23
- 24 • Suppliers may identify and label offers as a “PCAP Customer Product”, and must comply
25 with all disclosure requirements contained in the Commission’s supplier regulations.

⁷² Petitions of MedEd, Penelec, Penn Power, and West Penn Power for Approval of a Default Service Program for the Period Beginning June 1, 2019 through May 31, 2023, Opinion and Order, Docket Nos. P-2017-2637855, -57, -58, -56, at 58 (order entered Aug. 23, 2018); see also Petitions of MedEd, Penelec, Penn Power, and West Penn Power for Approval of a Default Service Program for the Period Beginning June 1, 2019 through May 31, 2023, Final Order, Docket Nos. P-2017-2637855, -57, -58, -56, at 58 (order entered Feb. 28, 2019); see also FE St. 1 at 7.

⁷³ Petitions of MedEd, Penelec, Penn Power, and West Penn Power for Approval of a Default Service Program for the Period Beginning June 1, 2019 through May 31, 2023, Final Order, Docket Nos. P-2017-2637855, -57, -58, -56, at 43-45 (order entered Feb. 28, 2019).

⁷⁴ Id. at 43-45.

- 1 • FirstEnergy must have sufficient data exchange protocols and must update their “sunc lists,
2 Eligible Customer Lists and account number access portals to identify customers that
3 participate in [CAP]”
4
- 5 • For renewal contracts, suppliers are obligated to determine whether the customer is
6 participating in CAP. If the customer was not participating in CAP at the time the supplier
7 sends a 30-day options notice, it is permitted to treat the customer as a non-CAP participant.
8

9 The Commission also set forth transitional rules for CAP shopping customers enrolled in CAP
10 as of June 1, 2019, when the CAP rules took effect, and for residential shopping customers who
11 later seek to enroll in CAP.⁷⁵

- 12 • CAP participants served by a fixed duration contract with a supplier as of June 1, 2019, as
13 well as those who later enrolled in CAP while subject to a fixed duration contract, were
14 permitted to remain on that contract until the expiration date or the contract is terminated,
15 whichever came first.
16
- 17 • Upon expiration of the fixed duration contract, suppliers were required to (1) enroll the
18 CAP participant in a compliant contract (at/below the default service price); or (2) return
19 the participant to default service.
20
- 21 • Suppliers serving CAP participants or those who later enroll in CAP under a month-to-
22 month contract were required to return the participant to default service or enroll the
23 participant in a compliant contract within 120 days of the customer becoming a CAP
24 participant.

25 Suppliers were also required to comply with the Commission’s notice and disclosure provisions in
26 section 54.10 of the Commission’s regulations, with some modifications. FirstEnergy was also to
27 provide notice to all current and existing CAP participants, and to convene a workshop with
28 suppliers to educate them on the new rules.⁷⁶

⁷⁵ Id. at 45-46.

⁷⁶ Id. at 46.

1 **Q: Why did FirstEnergy implement CAP shopping rules in its last Default Service Plan**
2 **(DSP) proceeding?**

3 A: In FirstEnergy’s last DSP, the available data revealed that from June 2013 to March 2018,
4 CAP shopping customers were charged \$18.3 million in excess of the applicable default service
5 price.⁷⁷ The Bureau of Investigation and Enforcement estimated that, on an average yearly basis,
6 CAP shopping customers faced charges for electricity that exceeded the default service price by
7 \$694,422 for MetEd, \$698,616 for Penelec, \$130,908 for Penn Power, and \$2,251,212 for West
8 Penn Power.⁷⁸ Nonpayment rates across the four Companies was also higher during this time
9 period for CAP shopping customers compared to CAP customers who remained on the default
10 service rate.⁷⁹ Based on this substantial evidence, the Commission concluded:

11 There is clear evidence demonstrating that a significant number of FirstEnergy’s
12 CAP customers paid significantly more than what they would have if they were
13 default service customers. As outlined by I&E, this is importance since the
14 generation rates charged to FirstEnergy’s CAP customers affect the asked-to-pay
15 amounts for those customers since their monthly maximum CAP credits are based
16 upon their average monthly electric burden less a percentage of their income.
17 Therefore, higher rates make it more likely that CAP customers will exceed their
18 monthly maximum CAP credits and incur charges they may not be able to pay. If
19 customers are unable to pay their bills, this leads to increased uncollectibles, which
20 are recovered from the rest of the utility’s residential ratepayers. As such, it is
21 necessary to impose some restrictions on FirstEnergy CAP customer shopping in
22 order to protect both CAP customers and the non-CAP residential rate base from
23 increased and unnecessary costs.⁸⁰

⁷⁷ Petitions of MedEd, Penelec, Penn Power, and West Penn Power for Approval of a Default Service Program for the Period Beginning June 1, 2019 through May 31, 2023, Opinion and Order, Docket Nos. P-2017-2637855, -57, -58, -56, at 49-50, 53 (order entered Aug. 23, 2018).

⁷⁸ Id. at 49-53.

⁷⁹ Id. at 53.

⁸⁰ Id. at 58.

1 **Q: Please summarize FirstEnergy’s proposed CAP shopping rules for its new DSP.**

2 A: FirstEnergy proposes to continue its current CAP shopping rules (summarized above),
3 without modification.⁸¹

4 **Q: Did FirstEnergy conduct any qualitative or quantitative analysis of CAP shopping**
5 **rates to determine the effectiveness of its CAP shopping rules at preventing excessive**
6 **charges?**

7 A: No.⁸²

8 **Q: Did you conduct any analysis of CAP shopping rates to determine the effectiveness of**
9 **FirstEnergy’s CAP shopping rules?**

10 A: Yes. As I documented above, in section II, CAP shopping customers were charged over
11 \$9.1 million in excess of the default service price between July 2017 and December 2021.⁸³ Just
12 since June 2019, when FirstEnergy’s current CAP shopping rules were implemented, CAP
13 shopping customers were charged \$4,022,308 in excess of the default service price, with average
14 CAP shopping charges per CAP customer ranging from \$520.62 to \$1,316.46.⁸⁴

15 **TABLE 12: CAP Shopping Charges in Excess of Default Service, July 2019 – Dec. 2021⁸⁵**

JUNE 2019 – December 2021	Total Charges in Excess of Default Service	Avg. Charges Per CAP Customer in Excess of Default
MetEd	\$1,107,860.30	\$1,316.46
Penelec	\$1,147,910.33	\$520.62
Penn Power	\$278,010.85	\$640.92
West Penn Power	\$1,488,526.93	\$761.39
TOTAL	\$4,022,308.41	

16

⁸¹ FE St. 1 at 18.

⁸² CAUSE-PA to FE I-18.

⁸³ CAUSE-PA Exhibit 3.

⁸⁴ Id.

⁸⁵ Id.

1 Recall, too, that average uncollectible account balances for FirstEnergy’s CAP shopping
2 accounts are substantially higher than uncollectible accounts for non-shopping CAP customers.⁸⁶
3 In 2021 – two years after FirstEnergy implemented the current CAP shopping restrictions – the
4 average write-off balance for CAP shopping accounts was \$1,876.11, compared to \$1,038.69 for
5 CAP customers on default service.⁸⁷ There are also correspondingly stark disparities in payment
6 trouble and termination rates of CAP shopping customers compared to CAP customers who
7 remained on default service.⁸⁸ In 2021, 9.4% of CAP shopping customers were “payment troubled”
8 – while just 1.8% of CAP customers on default service were payment troubled.⁸⁹ Shockingly,
9 29.45% of CAP shopping customers were terminated for non-payment in 2021, compared to
10 8.77% for CAP customers on default service.⁹⁰

11 **Q: Did you conduct any further analysis of the rates CAP shopping customers have been**
12 **charged since FirstEnergy implemented its current CAP shopping rules?**

13 A: Yes. In response to discovery, FirstEnergy provided the actual usage and charges for each
14 CAP shopping customer for January, February, and March 2020.⁹¹ The discovery data was marked
15 “highly confidential” because it contained the individual supplier name for each account. I
16 redacted this information and performed an analysis of the individual per kWh price paid per CAP
17 shopping customer in each of those three months, across all four Companies. This allowed me to
18 sort the data to determine the number of CAP customers paying over the applicable default service
19 price, and the number of CAP customers paying at or below the applicable default service price.
20 Table 13 provides a summary of my findings.

⁸⁶ CAUSE-PA Exhibit 4(c).

⁸⁷ Id.

⁸⁸ CAUSE-PA Exhibits 5(b) and 6(b)

⁸⁹ CAUSE-PA Exhibit 5(b).

⁹⁰ CAUSE-PA Exhibit 6(b).

⁹¹ OCA to FE I-2, Attachment A – Highly Confidential. Note that no confidential information was used for this analysis.

1 **TABLE 13: CAP Shopping, Individual Accounts – January-March, 2020⁹²**

JANUARY 2020				
	CAP Shopping Accounts Over Default	CAP Shopping Accounts At/Below Default	Total CAP Shopping	% CAP Shopping Customers Paying More than Default
MetEd	986	473	1459	68%
Penelec	1238	762	2000	62%
Penn Power	397	6	403	99%
West Penn	1063	714	1777	60%
FEBRUARY 2020				
MetEd	990	497	1487	67%
Penelec	1248	761	2009	62%
Penn Power	385	7	392	98%
West Penn	1052	715	1767	60%
MARCH 2020				
MetEd	1355	126	1481	91%
Penelec	1793	761	2554	70%
Penn Power	394	5	399	99%
West Penn	1565	193	1758	89%

2 In each of these three months, more than half of all CAP shopping customers were being charged
 3 rates higher than the applicable default service price.

4 Notably, in March 2020 – as families went into lockdown across the state, and
 5 unemployment rates soared to historic levels as a result of the COVID-19 pandemic, between 70-
 6 99% of FirstEnergy’s CAP shopping customers were charged rates exceeding the applicable
 7 default service price. At the same time, residential consumers across the state – especially low
 8 income consumers – were amassing unprecedented levels of utility debt. It is plain to me that
 9 supplier pricing exacerbated the financial impact of the COVID-19 pandemic on FirstEnergy’s
 10 low income CAP customers, who should have been afforded enhanced pricing protections.

⁹² CAUSE-PA Exhibit 7.

1 **Q: How does FirstEnergy justify its proposal to continue its current CAP shopping rules**
2 **without modification?**

3 A: FirstEnergy points to a Tentative Order issued by the Commission in February 2019, which
4 set forth a proposed Policy Statement on CAP shopping. FirstEnergy submits that its current rules
5 are consistent with this proposed Policy Statement and the Commission’s order in its last DSP.
6 FirstEnergy further notes that its billing system “only accepts rate-ready, percentage-off rates on
7 CAP customer accounts” – which it submits is adequate to ensure EGS compliance with these
8 rules.

9 **Q: Is FirstEnergy’s reliance on the Commission’s proposed Policy Statement**
10 **reasonable?**

11 A: No. FirstEnergy’s reliance on the Commission’s proposed CAP shopping policy statement
12 is unreasonable. A proposed policy statement has no legal effect and, in and of itself, provides no
13 justification for FirstEnergy’s proposal to continue implementing CAP shopping rules that may
14 substantially impact both the affordability of CAP for CAP participants and other residential
15 ratepayers who pay for CAP. In fact, since the proposed policy statement has not been acted on
16 by the Commission, it is not yet official policy guidance of the Commission – which itself is
17 nonbinding. A proposed policy statement is merely a proposal. While Commission Staff
18 requested that EDCs “consider” the Commission’s Proposed CAP Shopping Policy Statement in
19 the context of its DSP filing, the Commission did not order or mandate FirstEnergy to do so, nor
20 did it suggest that FirstEnergy should propose a CAP shopping program in a vacuum without
21 consideration of other critical factors - including an assessment of applicable shopping data.

1 **Q: Do you support FirstEnergy’s CAP shopping proposal?**

2 A: No. FirstEnergy’s CAP shopping rules have failed to stem financial harm to CAP
3 customers and other residential ratepayers. As I detailed extensively at the outset of my testimony,
4 and above, CAP customers and residential consumers continue to shoulder millions of dollars in
5 charges that exceed the applicable default service rate.

6 **Q: Do you have any recommendations to improve FirstEnergy’s CAP shopping rules?**

7 A: Given the failure of FirstEnergy’s CAP shopping rules, I recommend that FirstEnergy
8 prohibit CAP customers from shopping for competitive service.

9 That said, it is critical that low income shopping customers have a clear path to enrollment
10 in CAP to help prevent the accrual of additional avoidable arrearages, and in turn higher
11 uncollectible expenses and higher programmatic costs to provide debt forgiveness through CAP.⁹³
12 To ensure that economically vulnerable low income consumers are still able to access assistance
13 through the program if they are shopping at the time they seek to enter the program, without delays
14 that could cause arrearage levels to increase unnecessarily, FirstEnergy’s CAP shopping rules
15 should prohibit suppliers from charging any termination or cancellation fees to customers who
16 must terminate a contract early in order to enroll in CAP. To simplify the enrollment process for
17 those shopping at the time they seek to enroll in the program, FirstEnergy should include a check-
18 box on the CAP application that allows shopping customers to indicate whether they would like to
19 be returned to default service in order to enroll in the program. The Commission’s regulations are
20 clear that a consumer does not need to go through a supplier to switch back to default service

⁹³ See CAUSE-PA Exhibit 4(b), comparing average account write-offs for confirmed low income, non-CAP accounts.

1 “when a Commission-approved program requires the EDC to initiate a change in EGS service.”⁹⁴
 2 This process for enrollment of current shopping customers into CAP would help ensure a seamless
 3 transition for economically vulnerable consumers, and would help reduce unnecessary accrual of
 4 arrears for customers that will ultimately enter CAP.

5 **Q: Have any other utilities implemented CAP shopping rules?**

6 A: Yes. The FirstEnergy Companies are outliers, as they are the only electric distribution
 7 companies in Pennsylvania that currently allow CAP customers to shop for service from the
 8 competitive market. In the last DSP proceedings for PECO Energy Company, Duquesne Light
 9 Company, and PPL Electric Utilities Corp., data showed that residential shopping customers across
 10 all three utilities were charged over \$1.1 billion in excess of the applicable default service rate.

11 **TABLE 14: Residential Shopping – PECO Electric, PPL Electric, Duquesne Light**⁹⁵

UTILITY	DATES ANALYZED	AMOUNT OF EXCESS CHARGE
PECO Electric	Jan. 2015 – April 2020	\$733,197,940
PPL Electric	Jan. 2015 – May 2020	\$295,828,735
Duquesne Light	Jan. 2017 – May 2020	\$102,869,316
Total		\$1,131,895,991

12

⁹⁴ See 52 Pa. Code § 57.172 (“When a customer or a person authorized to act on the customer’s behalf contacts the EDC to request a change from the current EGS or default service provider to a selected EGS, the EDC shall notify the customer that the selected EGS shall be contacted directly by the customer to initiative the change. ***This notification requirement does not apply when a Commission-approved program requires the EDC to initiate a change in EGS service.***”) (emphasis added).

⁹⁵ Petition of PPL Electric Utilities Corp. for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Harry Geller on Behalf of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA), Pa. PUC Docket No. P-2020-3019356, at 8 & Exhibit 1 (filed June 25, 2020); Petition of PECO Energy Co. for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Harry Geller on Behalf of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA), Pa. PUC Docket No. P-2020-3019290, at 10 & Exhibit 1 (filed June 16, 2020); Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Harry Geller on Behalf of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA), Pa. PUC Docket No. P-2020-3019522, at 10 & Exhibit 1 (filed July 17, 2020).

1 PECO and Duquesne both have long-standing CAP program rules that prohibit CAP
2 customers from shopping in the competitive market – thereby preventing financial harms to CAP
3 customers and other residential ratepayer created by excessive competitive market pricing.

4 PPL also now prohibits CAP shopping in its entirety after attempts to implement less
5 restrictive rules failed to stop ongoing harm to CAP customers and other residential ratepayers.
6 PPL had previously implemented a CAP shopping program in its 2017-2021 Default Service Plan,
7 which restricted CAP customers to shopping only through a CAP Standard Offer Program
8 designed to provide CAP customers with a mandatory 7% off the default service price at the time
9 they entered the program.⁹⁶ However, data in PPL’s last DSP proceeding showed that program
10 failed to effectively stop suppliers from charging CAP customers excessive rates – resulting in
11 nearly⁹⁷costs in 2019 alone.⁹⁸ Notably, from 2013-2020, CAP shopping customers in PPL’s
12 service territory were charged over \$30 million in excess of the applicable default service rate.^[OBJ]

13 As a result of ongoing and well-documented financial harm to CAP customers and other residential
14 ratepayers in PPL service territory, notwithstanding attempts to implement less restrictive
15 shopping rules, CAP customers there are no longer permitted to shop for competitive electric
16 supply. I believe that same outcome is necessary here to finally put a stop to the harm experienced
17 by CAP customers and other residential ratepayers. The FirstEnergy Companies have a continuing
18 obligation to operate their CAP programs in a fiscally responsible and efficient manner. The
19 implementation of CAP shopping rules in June 2019 was intended to limit CAP customer shopping
20 to default rates, and therefore reduce the costs for program participants and other ratepayers. Yet,

⁹⁶ Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2021 through May 31, 2025, Direct Testimony of James M. Rouland, Docket No. 2020-3019356, at 79 (filed March 25, 2020); see also id. Direct Testimony of Melinda Stumpf, 14.

⁹⁷ Id.

⁹⁸ Id.

1 despite FirstEnergy’s good faith efforts, CAP customer shopping payments in excess of default
2 rates continue. FirstEnergy remains the only electric company whose residential customers
3 continue to pay for CAP shopping costs. That must cease now. Experience has demonstrated that
4 there is no other reasonable alternative.

5 **IV. TIME OF USE (TOU) RATES**

6 **Q: Please summarize FirstEnergy’s TOU Rate Proposal.**

7 A: The Companies are proposing to implement TOU rates that will differentiate pricing across
8 three periods – on-peak (M-F, 2 p.m. to 9 p.m.), super off-peak (M-Su., 11 p.m. to 6 a.m.), and
9 off-peak (all other times).⁹⁹ These periods will remain the same year-round. However, customers
10 actively enrolled in FirstEnergy’s Customer Assistance Programs (CAPs) will not be eligible for
11 TOU rates.

12 FirstEnergy’s TOU rates were designed to: (1) to provide a “simple and understandable”
13 time varying rate that incentivizes consumers to “shift their usage patterns to off-peak hours”; (2)
14 provide incentives for electric vehicle owners to “better reflect wholesale cost causation in default
15 service rates”; and (3) “to link the TOU pricing structure to the PJM wholesale markets for energy
16 and capacity that drive the cost of the Companies’ default service auctions.”¹⁰⁰

17 TOU rates will be available on an optional basis for default service customers with a smart
18 meter.¹⁰¹ However, in recognition of the fact that low income households often have less flexibility
19 to shift usage to off-peak hours, FirstEnergy is proposing to exclude CAP customers from its
20 proposed TOU rate.¹⁰²

⁹⁹ FE St. 5 at 15.

¹⁰⁰ *Id.* at 14.

¹⁰¹ *Id.* at 15-16.

¹⁰² *Id.* at 16.

1 **Q: Do you agree with FirstEnergy’s decision to exclude CAP customers from its**
2 **proposed TOU rate?**

3 A: Yes. TOU rates are designed to incentivize consumers to shift discretionary usage to off-
4 peak hours. Time-varying pricing is costly for households with fixed or inflexible usage patterns
5 that cannot shift their usage. Economically vulnerable households often have very little
6 discretionary energy usage, such as washing machines, dish washers, and other large appliances,
7 and are more likely to live in smaller homes with less efficient heating and cooling spaces, fewer
8 electrical outlets, and fewer lights – all factors which make it difficult to shift load during peak
9 periods.¹⁰³ Consumers who are home during the day or are reliant on electric-powered medical
10 devices are often even less able to shift load to off-peak hours, as usage curtailment during peak
11 hours can have an immediate and substantial impact on the health and safety of individuals in the
12 home.¹⁰⁴ This includes households with retired Seniors, individuals with a disability or chronic
13 health condition, and families with young children. These vulnerable groups are also more likely
14 to be low income or otherwise income constrained, and are in turn more likely to participate in
15 CAP.¹⁰⁵

¹⁰³ See John T. Colgan et al., Guidance for Utilities Commissions on Time of Use Rates: A Shared Perspective from Consumer and Clean Energy Advocates, at 26-27, Equity and Distributional Bill Impacts (July 15, 2017), <https://uspig.org/sites/pirg/files/reports/TOU-Paper-7.17.17.pdf>; see also Lee V. White & Nicole Sintov, Health and Financial Impacts of Demand-Side Response Measures Differ Across Sociodemographic Groups, *Nature & Energy* Vol. 5 (Jan. 2020).

¹⁰⁴ See id.

¹⁰⁵ In 2020, roughly 1 in 5 CAP households relied on pension, retirement, or disability income. Pa. PUC, BCS, 2020 Report on Universal Service Programs and Collections Performance, at 49 (Nov. 2021), <https://www.puc.pa.gov/media/1709/2020-universal-service-report-final.pdf> (hereinafter 2020 Universal Service Report); see also National Council on Disability, Highlighting Disability / Poverty Connection (Oct. 2017), <https://ncd.gov/newsroom/2017/disability-poverty-connection-2017-progress-report-release> (“People with disabilities live in poverty at more than twice the rate of people without disabilities”); Children’s Defense Fund, The State of America’s Children, 2020, <https://www.childrensdefense.org/policy/resources/soac-2020-child-poverty-tables/> (showing substantially higher rates of poverty among families with children under 6 compared to poverty rates for families with older children).

1 Because time-varying pricing can disproportionately increase the cost of energy for
2 Pennsylvania’s most vulnerable consumers, they present a particularly inappropriate rate structure
3 for customers enrolled in CAP. CAP provides low income, economically vulnerable households
4 with an affordable bill based on the participant’s household income. As discussed at length in
5 section III, when the cost of energy for a CAP customers in FirstEnergy’s service territory exceeds
6 the standard default service price, two things occur: (1) the CAP customer faces higher overall
7 rates which they cannot afford; and (2) residential consumers who finance CAP through rates will
8 pay more for the program, as the amount of credits applied to the CAP bill will increase to reach
9 the target level of affordability. These outcomes contradict the explicit statutory purpose of CAP
10 to provide an affordable rate to economically vulnerable households to ensure they can maintain
11 service to their home, as well as the Commission’s statutory obligation to ensure that CAPs are
12 cost-effective and appropriately funded.¹⁰⁶

13 For these reasons, I support FirstEnergy’s decision to exclude CAP customers from
14 participation in TOU rates.

15 **Q: Is FirstEnergy’s proposed CAP exclusion, by itself, adequate to protect economically**
16 **and medically vulnerable residents from higher costs as a result of time varying rates?**

17 A: No. Although, FirstEnergy’s proposal to protect CAP customers from rate variability
18 associated with the TOU rate proposal is an important consideration, it does not fully protect other
19 vulnerable consumers who do not have the ability to meaningfully shift or reduce their electric
20 load through the day. As I just explained, time varying rates expose all economically vulnerable
21 households to increased risks of significant financial harm and negative health impacts. A recent
22 study of time varying rates across sociodemographic groups, published in January 2020, found

¹⁰⁶ 66 Pa. C.S. § 2802(9), (10), 2803, 2804(9).

1 that “assignment to TOU [rates] ... disproportionately increases bills for households with elderly
2 and disabled occupants, and *predicts worse health outcomes for households with disabled or ethnic*
3 *minority occupants than those for non-vulnerable counterparts.*”¹⁰⁷ The researchers explained
4 that this health nexus with TOU rates may be attributable to service deprivation during peak
5 periods – particularly amongst Hispanic customers and customers with a disability.¹⁰⁸

6 **Q: Do you have any recommendations to improve protections for low income households**
7 **with inflexible usage that would not benefit from time-varying rates?**

8 A: Yes. Given the unique financial and health-related impacts of time varying rates on
9 vulnerable low income consumers, I recommend that FirstEnergy implement additional
10 protections for all confirmed low income customers – as well as those with known medical usage.

11 First, FirstEnergy should inquire whether a household has medical usage if they inquire
12 about TOU rates. For those who indicate that they have medical usage, FirstEnergy should provide
13 the consumer with additional education and an individualized bill assessment prior to accepting
14 that consumer into a TOU rate option.

15 Second, all TOU informational and outreach materials should include information about
16 the availability of universal service programs to help consumers to better afford service. When a
17 consumer requests a TOU rate, FirstEnergy’s customer service representatives should offer to
18 screen the consumer for eligibility in its universal service programs. This would help ensure that
19 households with inflexible usage that are in search of lower rates are better advised of the
20 availability of FirstEnergy’s assistance programs and able to make a more informed decision.

¹⁰⁷ Lee White & Nicole Sintov, Health and Financial Impacts of Demand-Side Response Measures Differ Across Sociodemographic Groups, Nature & Energy Vol. 5 (Jan. 2020) (emphasis added).

¹⁰⁸ Id.

1 Third, FirstEnergy should develop a bill impact assessment tool that allows any consumer
2 to assess the impact of TOU rates on their bill based on actual usage patterns over the prior year
3 so that they can determine the likely bill impact, with specificity, before they decide to participate
4 in the TOU rate. When a consumer inquires about the TOU rate, FirstEnergy’s customer service
5 representatives should inform the consumer of the availability of this tool, and should offer to
6 provide the consumer with their individualized estimated bill impact for the next billing month.

7 Fourth, FirstEnergy should track the income, age, race/ethnicity, and disability status of
8 TOU rate participants to allow for a thorough analysis of TOU rate adoption – and the impact time-
9 varying rates may have on demographic groups.

10 Fifth, and finally, FirstEnergy should be required to conduct a third party evaluation of
11 TOU rates to be completed and submitted as part of FirstEnergy’s next default service plan
12 proceeding. This analysis should include, at a minimum, an assessment of the demographic data
13 identified above and the impact of time-varying rates on customer charges.

14 These measures would help ensure that vulnerable households with inflexible usage do not
15 end up on a time-varying usage rate that may exacerbate health or financial instability.

16 V. CUSTOMER REFERRAL PROGRAM

17 **Q: Please summarize FirstEnergy’s proposed Customer Referral Program (CRP).**

18 A: The CRP offers residential consumers a 12-month fixed price contract at 7% off the
19 applicable default service price at the time they enter the program.¹⁰⁹ A CRP participant may leave
20 the program without incurring any financial penalty at any time during the 12-month contract
21 period.¹¹⁰ At the end of the 12-month period, if a consumer does not actively select a new supplier,

¹⁰⁹ See OCA to FE I-7 Attachment A-F.

¹¹⁰ FE Exhibit JMS-2 at 12 of 18.

1 or affirmatively request to return to default service, the supplier may charge a new rate - subject
 2 to the written disclosure requirements in the Commission’s regulations.¹¹¹ If a consumer contacts
 3 FirstEnergy with any type of billing inquiry, to inquire about “customer choice”, or to set up
 4 service (either as a new or existing customer), they will be offered enrollment in the CRP and
 5 transferred to a third-party vendor (AllConnect) to complete the enrollment process.¹¹² Suppliers
 6 that wish to opt to participate in the CRP must pay a \$30.00 fee per customer acquired through the
 7 program, which covers the cost of program administration.¹¹³

8 **Q: How many residential consumers have participated in CRP?**

9 A: From June 2019 to December 2021, approximately 48,053 residential consumers enrolled
 10 in FirstEnergy’s CRP.

11 **TABLE 14: Residential CRP Enrollments¹¹⁴**

	MetEd	Penelec	Penn Power	West Penn Power	Total Across All Companies
2019 (Jun-Dec)	4,727	4,606	1,294	5,143	15,770
2020	6,170	5,532	1,545	6,251	17,955
2021	4,646	4,117	1,088	4,477	14,328
Total Per Company	15,543	14,255	2,384	15,871	48,053

12
 13 **Q: What is the purpose of the CRP?**

14 A: FirstEnergy’s CRP was borne from the Commission’s 2011 Retail Market Investigation.¹¹⁵
 15 At the time, the concept of a utility-administered referral program was seen as a “viable means to
 16 educate consumers about the retail electric market [that] may allow customers to achieve savings

¹¹¹ 52 Pa. Code § 54.10.

¹¹² See Shipley to FE I-5.

¹¹³ FE Exhibit JMS-2.

¹¹⁴ OCA to FE I-10, Attachment C. Note that there are thousands more residential customers who are referred to the program that do not ultimately enroll. See OCA to FE I-10, Attachments A & B.

¹¹⁵ See Investigation of Pennsylvania’s Retail Electricity Market: Intermediate Work Plan, Final Order, Docket No. I-2011-2237952, at 30-33 (order entered March 2, 2012).

1 on their bills.”¹¹⁶ In short, the program was broadly intended to provide consumers with an easy,
2 low-risk on-ramp to the competitive market that would teach consumers how to effectively engage
3 in the market to achieve the promise of savings envisioned by the Choice Act.¹¹⁷

4 **Q: Why is FirstEnergy proposing to continue the CRP?**

5 A: FirstEnergy asserts through testimony that it is in the public interest to continue the
6 program.¹¹⁸ As support, it cites to the Commission’s policy statement at section 69.1815, which
7 provides generally that: “The public interest would be served by *consideration* of customer referral
8 programs in which retail customers are referred to EGSs.”¹¹⁹ FirstEnergy also points to the
9 Commission’s Order in its last DSP proceeding, which found that continuation of the CRP with
10 improvements to the scripting “was in the public interest and compliant with the Commission’s
11 guidance and regulations.”¹²⁰

12 **Q: In support of its proposal to continue its CRP, did FirstEnergy conduct any analysis**
13 **of the price that customers participating in the program pay for electric supply either during**
14 **or after the initial 12 month program period?**

15 A: No.¹²¹

16 **Q: Did FirstEnergy examine the frequency with which consumers return to default**
17 **service after the initial 12 month program period?**

18 A: No.¹²²

¹¹⁶ See Investigation of Pennsylvania’s Retail Electricity Market: Recommendations Regarding Upcoming Default Service Plans, Final Order, Docket No. I-2011-2237952, at 33-44 (order entered Dec. 15, 2011).

¹¹⁷ Id. at 44; 66 Pa. C.S. § 2802.

¹¹⁸ FE St. 1 at 11.

¹¹⁹ Id. quoting 52 Pa. Code § 69.1815 (emphasis added).

¹²⁰ Id.

¹²¹ OCA to FE I-12; CAUSE-PA to FE II-4.

¹²² Id.

1 **Q: Has FirstEnergy provided any other quantitative or qualitative analysis of the CRP**
2 **to support its conclusion that continuation of the program is in the public interest, such as**
3 **customer satisfaction surveys or other assessment of CRP participants' understanding of the**
4 **competitive market following participation in the program?**

5 A: No.

6 **Q: Do you believe FirstEnergy's CRP is in the public interest?**

7 A: There is insufficient data available in this proceeding to make such a determination.
8 Ostensibly, an initial 7% discount off the default service price for a 12-month period may be
9 beneficial to residential ratepayers – but that really depends on the details of the rate that will be
10 charged and the level of engagement of consumers *at the conclusion of the 12-month period*, and
11 whether they are sufficiently knowledgeable about the competitive market at the conclusion of the
12 12 month period and thereafter to make an informed choice. As noted, FirstEnergy did not provide
13 any data or analysis to determine whether the CRP is fulfilling the original purpose of the program
14 to educate consumers and provide a low-risk on-ramp to the competitive market in order to provide
15 savings.

16 As implemented, FirstEnergy's CRP does not appear to actively teach residential
17 consumers how to effectively engage in the competitive market at the very point they will need to
18 make a critical choice. In my review of the call scripts and training documents regarding the CRP
19 used by FirstEnergy and AllConnect, I was unable to find any clear description of what happens
20 at the end of the CRP contract period, how a consumer can exercise their choice, or the potential
21 consequences to the consumer if they do not actively select a new contract at the end of the 12-
22 month term.¹²³ Rather, the scripts repeatedly underscore the potential for savings and minimize

¹²³ See OCA to FE I-7, Attachments A-F.

1 any potential downside to participation.¹²⁴ The only mention I could find regarding what happens
2 at the end of the 12-month term was near the end of the AllConnect training document. If a caller
3 asks: “What happens after the 12 months?”, call center representatives are told to “Keep things
4 simple – explain next steps to the customer, and assure them that the program is low risk and high
5 benefit.”¹²⁵

6 Rather than educate consumers about market participation, AllConnect’s call center
7 representatives are instructed to “sell the benefits” and “encourage participation”.¹²⁶ To the
8 contrary, AllConnect’s call center representatives are coached to provide answers to consumers
9 that suggest savings are guaranteed. For instance, in covering “frequently asked questions”,
10 AllConnect’s training documents note that if a customer asks “what is changing”, the
11 representative should explain that “the only items changing will be the supplier of the customer’s
12 electricity *and a lower price per kilowatt-hour on the bill for 12 months.*”¹²⁷ Elsewhere in the
13 training documents, call center representatives are cautioned not to suggest that savings are
14 guaranteed – but this statement suggests otherwise.

15 Based on my reading of the call scripting and training documents for the CRP, the program
16 acts as a funnel – sending residential consumers into the competitive market without providing the
17 proper supports for the customer to learn about and engage in the market to determine whether
18 shopping is right for them. This is a serious deficiency that very well may be doing more harm
19 than good over time – and contributing to the excessive competitive market pricing discussed
20 earlier in my testimony.

¹²⁴ See OCA to FE I-7, Attachments A-F.

¹²⁵ *Id.* Attachment D at 37 of 45.

¹²⁶ *Id.* Attachment D at 19 of 45.

¹²⁷ *Id.* Attachment D at 24 of 45 & Attachment E at 11 of 18 (emphasis added).

1 Ultimately, at the conclusion of the 12-month CRP contract period, when consumers will
2 need to make an informed choice, it is unclear from available data whether CRP participants have
3 any more knowledge about how to engage in the competitive market than they did when they
4 entered the program.¹²⁸ Based on decades of experience working directly with consumers, I believe
5 it is most likely that households do not actively engage with the competitive market at the end of
6 the CRP contract, and are therefore at a higher risk of being rolled into a high cost, variable rate
7 contract at the end of the CRP term. This conclusion is consistent with the residential shopping
8 data I presented above showing that, notwithstanding the fact that thousands of CRP participants
9 receive an initial 7% discount off the applicable default service price for a full year, residential
10 shopping customers as a whole are nevertheless consistently charged tens of millions of dollars
11 more each year for competitive electric supply than they would have paid if they remained on
12 default service.¹²⁹

13 **Q: Are you aware of any other utility that has performed an analysis of programs similar**
14 **to FirstEnergy’s CRP?**

15 A: Yes. PPL Electric conducted an in-depth review of its customers who participated in its
16 Standard Offer Program (SOP)¹³⁰ from 2015 through 2019 – and examined those customers’
17 shopping decisions for four months after the end of their SOP contract.¹³¹ In its study, PPL
18 concluded that the vast majority of its SOP customers – roughly 72% – did not make any
19 affirmative decision at the expiration of their contract, and instead rolled onto a new contract.¹³²

¹²⁸ CAUSE-PA to FE II-5, explaining that FE could not provide any data about the shopping prices charged to CRP participants at the conclusion of the CRP term.

¹²⁹ See supra section II.

¹³⁰ The terms of PPL’s SOP are substantially similar to FirstEnergy’s CRP.

¹³¹ Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2021 through May 31, 2025, Direct Testimony of Michelle LaWall-Schmidt, Docket No. 2020-3019356, at 8-12 (filed March 25, 2020).

¹³² Id. at 9.

1 PPL conducted an assessment of the rates that these residential customers paid after the conclusion
2 of the SOP, and found that 93% of residential customers who took no affirmative action to select
3 a new supplier or return to default service paid more than the default service price in the first month
4 following conclusion of the SOP term.¹³³ That number rose to 94% within 4 months after their
5 SOP contract ended, 89% of which were paying 10% or more over the applicable PTC.¹³⁴ Just
6 6% of these customers were paying at or below the PTC within 4 months of their contract
7 ending.¹³⁵

8 **Q: Is it reasonable to conclude that FirstEnergy’s residential CRP customers are likely**
9 **to follow the same patterns?**

10 A: Yes. While FirstEnergy and PPL serve different service territories, there is no data to
11 suggest that the behavior of residential consumers in this context varies from one locality to
12 another. In my experience, I have found consumer shopping behavior across the Commonwealth
13 is generally consistent and does not vary by geographic region. The extensive data above in section
14 II, documenting excessive pricing in the residential retail market across FirstEnergy’s four
15 Companies further supports this conclusion.

16 **Q: Do you have any recommendation regarding FirstEnergy’s CRP?**

17 A: Yes. I recommend that the Commission reject FirstEnergy’s CRP proposal. As I’ve
18 explained, FirstEnergy has failed to adequately consider the consequences of continuing its CRP
19 and whether there are consumer savings or consequential rate increases after the initial enrollment.
20 In short, there is no evidence to support a conclusion that the CRP is in the public interest.

¹³³ Id. at 11-12.

¹³⁴ Id. at 12.

¹³⁵ Id.

1 If FirstEnergy is nevertheless approved to continue its CRP, I recommend that FirstEnergy
2 be required to further amend its CRP scripts and training materials to clearly disclose the risks to
3 consumers should they fail to take action at the end of the 12-month period. In turn, the scripts and
4 training materials should be further amended to remove all emphasis on “selling” the program –
5 and to ensure that consumers are not misled about the potential for savings. Instead, the potential
6 for additional costs should be equally disclosed – especially where the consumer fails to be
7 appropriately informed and engaged to proactively act at the conclusion of the introductory term.

8 In addition to making changes to its call scripts and training materials, FirstEnergy should
9 be required to conduct third-party assessment of the program which, at a minimum, examines the
10 level of competitive market engagement of a consumer at the end of the 12-month term. Such an
11 assessment should include quantitative data analysis of the prices charged both during and after
12 the program term, and qualitative customer satisfaction surveys to determine whether and to what
13 extent the program is working to achieve its intended purpose to educate consumers about how to
14 effectively engage in the market to achieve bill savings. The results of this assessment should be
15 filed at this Docket within 6 months. If necessary and warranted based on the results of this
16 program assessment, FirstEnergy should seek approval to end or amend the terms of its CRP.

17 **Q: Do you have any other concerns about FirstEnergy’s CRP that you’d like to address?**

18 A: Yes. I am concerned that FirstEnergy is offering CRP to low income customers that
19 FirstEnergy has already actively screened and referred, or is in the process of screening, for
20 enrollment in CAP.¹³⁶ An offer of CRP to those customers creates a potential conflict for the CAP
21 eligible customer, as well as a potentially negative economic consequences. A customer that is
22 actively participating in the CRP is ineligible to enroll in CAP, given the price for service could

¹³⁶ CAUSE-PA to FE III-3, III-6.

1 exceed the applicable default service rate.¹³⁷ By referring the customer to CRP during or after
2 screening and referring to CAP, FirstEnergy is essentially encouraging consumers who are eligible
3 for CAP to become ineligible for CAP in the very same call. Such a result is unreasonable,
4 confusing, and undermines efforts to ensure that low income households are able to access and
5 enroll in available universal service programming.

6 When a customer contacts FirstEnergy regarding a high bill, it is often because the
7 customer cannot afford to pay their bill. Customers who cannot afford to pay their bill are often
8 in a state of high-stress, desperate for financial resources, and are particularly susceptible to
9 promised savings - making it (at best) an inopportune time for marketing activities- however low
10 key they may be at that moment- that may result in higher rates at the conclusion of the CRP. This
11 is especially so when, instead of referral to CRP (a time-limited program that data shows often
12 results in a transition to higher rates at its conclusion), a universal service program (which is not
13 time-limited and continues to be based on rates intended to be tied to affordability) could more
14 fully resolve the customers' high bill issue by providing targeted affordability, conservation and
15 energy reduction services, and arrearage forgiveness. At the very least, once referred to CAP, a
16 customer should not also be transferred a third party vendor to discuss enrollment in CRP.

17 **Q: Do you have any recommendations regarding referrals for high bill calls?**

18 A: Yes. FirstEnergy should be required to actively screen high bill calls for CAP eligibility.
19 If eligible, consumers with high bill concerns should be referred to CAP, other appropriate
20 universal services, and LIHEAP (when available), and should not also be referred to the CRP at
21 the conclusion of the call if they have been referred to these other programs.

¹³⁷ See CAUSE-PA to FE III-6.

1 **VI. THIRD-PARTY DATA ACCESS TARIFF PROPOSAL**

2 **Q: Please summarize FirstEnergy’s proposal regarding third-party access to customer**
3 **information.**

4 A: FirstEnergy is proposing to implement a new “Third-Party Data Access Tariff” for each
5 Company, which will “establish policies and procedures governing access by *eligible third parties*
6 to customer data maintained by the Companies.”¹³⁸ FirstEnergy’s proposed tariff language defines
7 a “Third Party” as “any person or entity seeking to obtain Customer Data from the Company that
8 is not an Electric Generation Supplier, including a Conservation Service Provider, a Curtailment
9 Service Provider, or other Market Participant.”¹³⁹ Though, in testimony, FirstEnergy makes it clear
10 that the tariff definition did not contain an all-inclusive list – and that third parties “may include
11 (but are not limited to) energy consultants, conservation service providers, curtailment service
12 providers, local government, state and federal agencies, and academic researchers.”¹⁴⁰ The data
13 subject to possible third party disclosure through the proposed tariff is also very broad, and
14 includes “information pertaining to retail customers, including AMI Interval Data and customer
15 account information, such as customer address, contact information, payment history, account
16 number, and billed amount.”¹⁴¹

17 A third party seeking customer data under the proposed tariff would be required to
18 complete a simple registration process – which in essence would require the person or entity to
19 submit a form attesting that they (1) have obtained consent of each consumer for which data is

¹³⁸ FE St. 6 at 5 (emphasis added).
¹³⁹ See FE Exhibit TLC-1 at 7 of 23.
¹⁴⁰ FE St. 6 at 5.
¹⁴¹ See FE Exhibit TLC-1 at 6 of 23.

1 requested, (2) will abide by the rules of the tariff, and (3) will “keep any customer data received
2 secure and confidential.”¹⁴²

3 FirstEnergy proposes to place the onus of collecting consumer consent and maintaining
4 records of that consent on the third party requesting such data – without any requirement for the
5 third party to provide those records to FirstEnergy for verification.¹⁴³ FirstEnergy has a form that
6 third parties could use to obtain consent, though there does not appear to be any requirement in the
7 tariff that third parties use this form to obtain a consumer’s consent.¹⁴⁴

8 Customer consent would not be required for third parties to obtain “aggregated,
9 anonymized data.”¹⁴⁵ The proposed tariff language also explicitly allows a third party to disclose
10 “Customer-specific information” if the third party has written authorization to do so.¹⁴⁶ Though,
11 there is no process contemplated to verify how and under what circumstances a third party could
12 obtain consent to further disclose the consumer’s data to other third parties not subject to the terms
13 of FirstEnergy’s tariff.

14 FirstEnergy is proposing to automate the data exchange process – allowing third parties to
15 access customer data through the supplier portal once the third party completes the registration
16 process.¹⁴⁷ FirstEnergy explains in testimony that it is already turning over customer data to third
17 parties on an “ad hoc” basis with submission of a customer authorization form, and that this process
18 will help to streamline and standardize its response to third party requests.¹⁴⁸

¹⁴² FE St. 6 at 6, 8; FE Exhibit TLC-1 at 16 (Confidentiality of Information).

¹⁴³ FE St. 6 at 7.

¹⁴⁴ See CAUSE-PA to FE II-12. The form is available at:

https://www.firstenergycorp.com/content/dam/customer/esp/CustUsageInfoAuthForm-Generic_5-30-07.pdf.

¹⁴⁵ FE St. 6 at 8.

¹⁴⁶ FE Exhibit TLC-1 at 16 (Confidentiality of Information).

¹⁴⁷ FE St. 6 at 7.

¹⁴⁸ *Id.* at 5.

1 **Q: Do you have any concerns about FirstEnergy’s proposal?**

2 A: Yes, I have several concerns.

3 First, I am concerned that FirstEnergy’s proposal places the onus and essential control of
4 the process on third parties to obtain customer consent – without any oversight or verification by
5 FirstEnergy or, ultimately, the Commission. While FirstEnergy has a standard form currently in
6 use, FirstEnergy’s tariff proposal does not require third parties to utilize this form or any other
7 specifically prescribed form to solicit customer consent. This raises questions about the knowing
8 and informed type of consent provided by the consumer, including the manner in which a consumer
9 will be advised of the scope of disclosure; the consumer’s rights to withhold consent or constrain
10 the scope of disclosure; the process for which a consumer could later revoke consent; or whether
11 and how the third party intends to use the consumer’s information.

12 I am also concerned that the proposal relies exclusively on third parties to establish and
13 maintain appropriate protocols for the storage and treatment of highly sensitive personal usage and
14 account information. Given the broad range, and the essentially unlimited definition, of third
15 parties that could obtain access to voluminous and highly sensitive customer data under
16 FirstEnergy’s proposal and the desire of FirstEnergy to automate the process, it is critical that third
17 parties not only broadly attest that they will safeguard consumer data – but also agree to adhere to
18 explicit data protection standards and protocols.

19 The lack of clear provisions governing consumer confidentiality is also cause for serious
20 concern. FirstEnergy’s proposed tariff requires generally that third parties “shall keep all
21 Customer-specific information supplied by the Company confidential *unless the Third Party has*
22 *the Customer’s written authorization to do otherwise.*”¹⁴⁹ FirstEnergy’s proposal does not include

¹⁴⁹ FE Exhibit TLC-1 at 16 of 16 (emphasis added).

1 any parameters for how a third party must obtain this *additional* consent from a consumer to
2 disclose consumer information to other third parties – potentially exposing customer data to layers
3 upon layers of unlimited and unrestricted exposure.

4 The proposed third party registration form further provides that registrants “*will treat data*
5 *specific to a Customer that it accesses or retrieves, or both, as confidential information and ensure*
6 *the confidentiality of such data specific to such Customer in accordance with all applicable*
7 *statutes and regulatory orders or rules.*”¹⁵⁰ But the tariff proposal does not provide any specific
8 definition of confidentiality – nor does it contain any proposed parameters for confidentiality. I
9 am also unaware of any statutes, regulatory orders, or rules in the Public Utility Code that impose
10 confidentiality requirements on a third party that is not regulated by the Public Utility
11 Commission.¹⁵¹ I am advised by counsel that this issue will be explored in greater detail through
12 briefing.

13 As proposed, FirstEnergy’s third party data access proposal includes a broad range of third
14 parties, and contemplates inclusion of government and law enforcement agencies. As these entities
15 could access customer data for a range of immigration and other types of enforcement actions, a
16 series of thorny legal issues may arise for FirstEnergy concerning the ability of consumers to
17 access utility regardless of immigration status or the chilling effect such potential governmental
18 disclosure would have on the ability or desire of a consumer to access service. Without a higher
19 level of Commission guidance regarding these issues, permitting the proposed tariff now would
20 be premature.

¹⁵⁰ Id. at 23 of 23.

¹⁵¹ In response to discovery, FirstEnergy noted that it has not conducted any legal research or analysis to determine whether any statutes, orders, or rules would apply to third parties who obtain customer data from the Companies pursuant to its proposed tariff. CAUSE-PA to FE II-9.

1 Finally, I am concerned that the third party access contemplated by the tariff proposal could
2 leave consumers without any meaningful recourse if their information is compromised or
3 otherwise used for an inappropriate purpose. FirstEnergy is essentially proposing to allow third
4 parties to access the same kind of data available to electric generation suppliers (EGSs). But unlike
5 EGSs, the third parties included in FirstEnergy’s tariff proposal are not licensed by the
6 Commission and it is unclear how the Commission could exercise jurisdiction over a third party
7 to provide relief to an aggrieved consumer. While the proposed tariff language sets forth
8 conditions and requirements for third parties, it is also unclear how the provisions of FirstEnergy’s
9 tariff could be enforced against a third party who violates those tariff rules.

10 I note that the proposed tariff does allow FirstEnergy to revoke a third party’s access to
11 consumer data if the third party fails to adhere to the terms of the proposed tariff. But when it
12 comes to data disclosure, once the damage is done, it cannot be undone. While this possible, but
13 not required, revocation of future access may prevent future harm, it would not help redress any
14 harm already incurred. Moreover, without any requirement for FirstEnergy to monitor compliance
15 and obtain customer authorizations, it is unclear when and how violations of the tariff would be
16 uncovered, or once discovered, what would be the timeline and process of access revocation.

17 Ultimately, FirstEnergy’s Third Party Data Access proposal lacks critical details necessary
18 to ensure consumer data is protected from unauthorized or inappropriate disclosure.

19 **Q: Are there any other factors that should be considered in evaluating FirstEnergy’s**
20 **Third Party Data Access Tariff proposal?**

21 A: Yes. As FirstEnergy’s witness recognized in testimony, the Commission recently opened
22 a statewide inquiry “to determine if a safe, acceptable path exists for registered conservation
23 service providers and other third parties to potentially gain access to customer data electronically

1 from EDC data systems, with customer consent.”¹⁵² The Commission published a request for
2 public comment on this issue in the Pennsylvania Bulletin on February 19, 2022.¹⁵³

3 FirstEnergy argues that the Commission should approve its proposed tariff -
4 notwithstanding the Commission’s active statewide inquiry – “in light of the increasing number
5 and variety of requests the Companies are receiving and the time that is likely to be required to
6 complete [the statewide proceeding].”¹⁵⁴ FirstEnergy argues that the proposed tariff will allow it
7 to better safeguard consumer data – “while also preparing for future requirements that may be
8 established by the Commission through additional proceedings.”

9 While I agree that it is important for FirstEnergy to establish parameters to govern data
10 sharing, there are still critical details missing from FirstEnergy’s proposal that must be worked out
11 before implementation. As I noted above, data disclosure cannot be undone. Given the unique and
12 potentially irreversible nature of the harm that may occur as a result of inappropriate data
13 disclosure as well as the significant level of definitional and process development still to be done
14 by FirstEnergy, I do not believe that it is appropriate to implement this proposed tariff at this time.

15 **Q: Do you have any recommendation regarding FirstEnergy’s Third Party Data Access**
16 **Tariff proposal?**

17 A: Yes. Based upon the significant concerns I have enumerated and the lack of detail, clarity,
18 and assurance of consumer protections, I recommend that the Commission reject FirstEnergy’s
19 proposed Third Party Data Access Tariff.

¹⁵² FE St. 6 at 9; see also 52 Pa.B. 1209.

¹⁵³ 52 Pa.B. 1209.

¹⁵⁴ FE St. 6 at 9.

VII. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Q: Please summarize your conclusions and recommendations.

A: Throughout the course of my testimony, I provided an overview of residential customer shopping, and discussed the impact of FirstEnergy’s Customer Assistance Program (CAP) shopping proposal, its TOU proposal, its Customer Referral Program (CRP) proposal, and its proposal to allow third-parties to access customer account information with little to no oversight and inadequate safeguards to protect data from unlawful disclosure. The following is a high level overview of the conclusions, findings, and recommendations I made regarding each topic.

Residential Customer Shopping Overview

- Overall, on a net and average basis between August 2017 and December 2021, FirstEnergy’s residential shopping consumers were charged over \$431 million more than they would have been charged if they did not shop.¹⁵⁵
- In a single month (December 2021), confirmed low income shopping customers in FirstEnergy’s service territory (not including CAP customers) were charged a \$1,149,327.89 more than they would have been charged if they did not shop.¹⁵⁶
- Overall, on a net and average basis between July 2017 and December 2021, FirstEnergy’s CAP shopping consumers were charged \$9,151,853 million more than they would have been charged if they did not shop.¹⁵⁷
- In 2021:
 - 2.3% of residential shopping customers were “payment troubled” – compared to just 1.52% of residential customers who did not shop.¹⁵⁸
 - 4% of residential shopping customers were involuntarily terminated for non-payment – compared to 2.8% of residential customers who did not shop.¹⁵⁹

¹⁵⁵ CAUSE-PA Exhibit 1(a)-(d).

¹⁵⁶ CAUSE-PA Exhibit 2.

¹⁵⁷ CAUSE-PA Exhibit 3(a)-(d).

¹⁵⁸ CAUSE-PA Exhibit 5(a). A customer is considered “payment troubled” if they have broken one or more prior payment arrangements in a given year. 2020 Universal Service Report at 10.

¹⁵⁹ CAUSE-PA Exhibit 6(a).

- 1 ○ The average write-off for FirstEnergy’s residential shopping customer accounts was
2 \$1,204.99 – compared to \$767.27 for FirstEnergy’s residential default service customer
3 accounts. *A difference of \$437.72.*¹⁶⁰
4
- 5 ○ The average write-off for FirstEnergy’s confirmed low income shopping customer
6 accounts was \$1,660.76 – compared to \$1,212.43 for FirstEnergy’s confirmed low
7 income default service customer accounts. *A difference of \$448.33.*¹⁶¹

8 **CAP Shopping Plan**

9 When CAP customers pay rates in excess of the default service price, it causes two harms: (1) the
10 low income household must pay higher rates, often resulting in greater payment trouble and
11 termination, and (2) the cost of the program increases over time, which in turn increases the
12 Universal Service rider recovered from all residential ratepayers. FirstEnergy’s current CAP
13 shopping rules have failed to stop substantial financial harm to low income CAP customers and
14 other residential ratepayers created by excessive pricing in the competitive market.

- 15 • Since June 2019, when FirstEnergy’s current CAP shopping rules were implemented, CAP
16 shopping customers have been charged \$4,022,308 in excess of the default service price.
17
- 18 • On a per-customer and average basis from June 2019 to December 2021, CAP shopping
19 customers were charged between \$520.62 (Penelec) and \$761.39 in excess of the applicable
20 default service price.
21
- 22 • In 2021, 9.4% of CAP shopping customers were “payment troubled”– compared to 1.8% of
23 CAP customers who did not shop.¹⁶²
24
- 25 • Also in 2021, 29.5% of CAP shopping customers were involuntarily terminated for non-
26 payment – compared to 8.8% of CAP customers who did not shop.¹⁶³
27
- 28 • The average account write-off for FirstEnergy’s CAP shopping customers was \$1,876.11 –
29 compared to \$1,038.69 for CAP default service customers. *A difference of \$837.42.*¹⁶⁴
30
- 31 • *Recommendations:*
 - 32 ○ Prohibit CAP customers from shopping for competitive service.

¹⁶⁰ CAUSE-PA Exhibit 4(a).
¹⁶¹ CAUSE-PA Exhibit 4(b).
¹⁶² CAUSE-PA Exhibit 5(b).
¹⁶³ CAUSE-PA Exhibit 6(b).
¹⁶⁴ CAUSE-PA Exhibit 4(c).

- 1
- 2 ○ Require FirstEnergy to implement CAP rules that prevent suppliers from charging any
- 3 fees to CAP customers who must cancel service to enroll in CAP.
- 4
- 5 ○ Implement a simple mechanism for customers applying for CAP to return to default
- 6 service.

7 **Time of Use Rate Proposal**

- 8 • Time varying rates have the potential to negatively impact CAP benefits, decreasing the
- 9 effectiveness of CAP at delivering an affordable bill and increasing the cost of CAP to other
- 10 ratepayers.
- 11
- 12 • Many low income households are unable to reasonably shift usage during off peak hours, as
- 13 they most often do not have discretionary energy usage that could reasonably be curtailed.
- 14
- 15 • Other vulnerable consumers, including seniors, individuals with disabilities, and single parent
- 16 families with young children (all of whom are generally more likely to be low income or
- 17 income constrained), often have inflexible usage patterns and are otherwise unable to
- 18 reasonably shift their energy usage.
- 19
- 20 • Research has revealed a link between TOU rates and poor health outcomes in low income and
- 21 minority communities attributable to usage deprivation.
- 22
- 23 • *Recommendations:*
- 24 ○ Implement additional protections – including individualized bill assessments prior to
- 25 enrollment- for all low income customers, as well as those with known medical usage.
- 26
- 27 ○ Track the income, age, race/ethnicity, and disability status of TOU rate participants.
- 28
- 29 ○ Conduct a third party evaluation of TOU rates to be completed and submitted as part
- 30 of FirstEnergy’s next default service plan proceeding.

31 **Customer Referral Program (CRP)**

- 32 • FirstEnergy has not conducted any assessment of the CRP, or the price that CRP participants
- 33 pay during or after the program period.
- 34
- 35 • In light of the overwhelming evidence that average residential shopping prices substantially
- 36 exceed the default service price, despite strong participation in the CRP, it is reasonable to
- 37 conclude that the CRP is not appropriately educating consumers about how to effectively
- 38 engage in the market at the conclusion of the CRP term to achieve meaningful bill savings.
- 39
- 40 • *Recommendations:*
- 41 ○ Reject FirstEnergy’s proposed CRP.

- 1 ○ In the alternative, require FirstEnergy to conduct a third-party evaluation of its CRP to
2 determine the effectiveness of the program at achieving the Commission’s stated goals
3 of educating consumers to effectively engage in the market to achieve bill savings.
4
5 ▪ This third party program review should include, at a minimum, an assessment
6 of the rates charged both during and after the program term, the consumer’s
7 level of engagement in the market, and the participant’s satisfaction with the
8 program 6 months following program participation.
9
10 ▪ The review should conclude with the issuance of a report and recommendations,
11 which should be filed with the Commission within 6 months.
12
13 ▪ Following the issuance of this report, FirstEnergy should be required to file a
14 Petition to end or amend its CRP based on the outcome of the program review.

15 **Third Party Data Sharing Tariff**

16 FirstEnergy’s Third Party Data Sharing Tariff lacks critical details regarding the requisite
17 consumer consent and disclosures, standards and definitions governing confidentiality and data
18 management, and the path for consumers to seek a remedy if a third party improperly accesses or
19 mismanages their data.

20 • *Recommendation*

- 21 ○ Reject FirstEnergy’s Third Party Data Access Tariff.

22 **Q: Does this conclude your direct testimony?**

23 A: Yes. Though I reserve the right to respond to issues raised by other parties in the context
24 of Rebuttal and Surrebuttal and/or to amend my testimony if additional information becomes
25 available through discovery.

RESIDENTIAL SHOPPING - SUMMARY, ALL SERVICE TERRITORIES

August 2017-December 2021

Total Residential Shopping Charges in Excess of Default Service Price					
	Met-Ed	Penelec	Penn Power	West Penn Power	Total Over Default Service Price Across All Companies
2017 (Aug - Dec)	\$11,895,065.29	\$9,457,446.77	\$3,239,881.10	\$8,831,164.99	\$33,423,558.15
2018	\$27,853,794.07	\$21,179,501.16	\$6,913,754.46	\$29,085,241.19	\$85,032,290.88
2019	\$33,176,269.67	\$24,579,074.05	\$7,957,473.93	\$33,915,290.50	\$99,628,108.15
2020	\$34,260,190.49	\$23,262,162.79	\$7,975,361.93	\$38,267,078.27	\$103,764,793.48
2021	\$30,050,144.50	\$25,980,103.38	\$8,587,994.50	\$44,685,828.57	\$109,304,070.95
Total	\$137,235,464.02	\$104,458,288.15	\$34,674,465.92	\$154,784,603.52	\$431,152,821.61

Average Per-Customer Residential Charges in Excess of Default Service Price				
	MetEd	Penelec	Penn Power	West Penn Power
2017 (Aug - Dec)	\$ 70.53	\$ 64.73	\$ 84.24	\$ 52.64
2018	\$ 180.01	\$ 158.29	\$ 192.72	\$ 184.95
2019	\$ 233.80	\$ 201.09	\$ 234.73	\$ 230.56
2020	\$ 253.64	\$ 198.67	\$ 241.19	\$ 271.32
2021	\$ 244.37	\$ 245.03	\$ 287.93	\$ 352.32
TOTAL	\$ 982.35	\$ 867.81	\$ 1,040.81	\$ 1,091.79

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-1, Attach. A-C REVISED; CAUSE-PA to FE I-4, Attachment A (PTC)

RESIDENTIAL SHOPPING - MetEd

August 2017 - December 2021

Date	Residential Shopping Customer Count	Residential Shopping Usage (kWh)	Total Residential Shopping Charges Billed	Avg \$/kWh - Residential Shopping	Avg \$/kWh Over Default Rate	Total Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Aug-17	171,980	186,140,974	\$ 14,276,597.60	\$ 0.077	\$ 0.017	\$ 3,074,633.78	\$ 0.060	\$ 11,201,963.82	\$ 17.88	\$ 83.01	\$ 65.14
Sep-17	169,842	147,002,621	\$ 11,337,670.46	\$ 0.077	\$ 0.017	\$ 2,524,863.33	\$ 0.060	\$ 8,812,807.13	\$ 14.87	\$ 66.75	\$ 51.89
Oct-17	167,911	141,336,109	\$ 10,989,263.73	\$ 0.078	\$ 0.018	\$ 2,516,164.00	\$ 0.060	\$ 8,473,099.73	\$ 14.99	\$ 65.45	\$ 50.46
Nov-17	166,295	121,517,115	\$ 9,516,767.24	\$ 0.078	\$ 0.018	\$ 2,231,816.20	\$ 0.060	\$ 7,284,951.04	\$ 13.42	\$ 57.23	\$ 43.81
Dec-17	164,908	162,847,781	\$ 12,647,292.74	\$ 0.078	\$ 0.010	\$ 1,547,587.99	\$ 0.068	\$ 11,099,704.75	\$ 9.38	\$ 76.69	\$ 67.31
2017			\$ 58,767,591.77			\$ 11,895,065.29		\$ 46,872,526.48	\$ 70.53	\$ 349.14	\$ 278.60
18-Jan	163,379	218,504,797	\$ 17,000,698.60	\$ 0.078	\$ 0.010	\$ 2,107,411.64	\$ 0.068	\$ 14,893,286.96	\$ 12.90	\$ 104.06	\$ 91.16
Feb-18	161,934	186,106,409	\$ 14,361,449.77	\$ 0.077	\$ 0.009	\$ 1,676,436.93	\$ 0.068	\$ 12,685,012.84	\$ 10.35	\$ 88.69	\$ 78.33
Mar-18	160,129	157,105,914	\$ 12,192,983.44	\$ 0.078	\$ 0.016	\$ 2,482,266.90	\$ 0.062	\$ 9,710,716.54	\$ 15.50	\$ 76.14	\$ 60.64
Apr-18	158,858	147,078,727	\$ 10,821,163.36	\$ 0.074	\$ 0.012	\$ 1,730,227.24	\$ 0.062	\$ 9,090,936.12	\$ 10.89	\$ 68.12	\$ 57.23
May-18	156,926	120,513,746	\$ 10,424,146.91	\$ 0.086	\$ 0.025	\$ 2,975,192.27	\$ 0.062	\$ 7,448,954.64	\$ 18.96	\$ 66.43	\$ 47.47
Jun-18	155,290	131,778,657	\$ 10,496,333.38	\$ 0.080	\$ 0.016	\$ 2,140,248.74	\$ 0.063	\$ 8,356,084.64	\$ 13.78	\$ 67.59	\$ 53.81
Jul-18	154,016	164,058,058	\$ 13,136,244.41	\$ 0.080	\$ 0.017	\$ 2,733,322.95	\$ 0.063	\$ 10,402,921.46	\$ 17.75	\$ 85.29	\$ 67.54
Aug-18	152,675	170,995,874	\$ 13,544,613.90	\$ 0.079	\$ 0.016	\$ 2,701,765.53	\$ 0.063	\$ 10,842,848.37	\$ 17.70	\$ 88.72	\$ 71.02
Sep-18	151,178	168,771,358	\$ 13,328,513.53	\$ 0.079	\$ 0.018	\$ 3,087,467.53	\$ 0.061	\$ 10,241,046.00	\$ 20.42	\$ 88.16	\$ 67.74
Oct-18	149,838	123,107,645	\$ 9,761,069.16	\$ 0.079	\$ 0.019	\$ 2,290,897.26	\$ 0.061	\$ 7,470,171.90	\$ 15.29	\$ 65.14	\$ 49.85
Nov-18	149,026	118,842,280	\$ 9,356,308.73	\$ 0.079	\$ 0.018	\$ 2,144,959.18	\$ 0.061	\$ 7,211,349.55	\$ 14.39	\$ 62.78	\$ 48.39
Dec-18	147,680	153,906,588	\$ 12,070,714.24	\$ 0.078	\$ 0.012	\$ 1,783,597.90	\$ 0.067	\$ 10,287,116.34	\$ 12.08	\$ 81.74	\$ 69.66
2018			\$ 146,494,239.43			\$ 27,853,794.07		\$ 118,640,445.36	\$ 180.01	\$ 942.86	\$ 762.85
Jan-19	146,827	176,066,477	\$ 14,016,237.11	\$ 0.080	\$ 0.013	\$ 2,247,953.79	\$ 0.067	\$ 11,768,283.32	\$ 15.31	\$ 95.46	\$ 80.15
Feb-19	145,874	173,376,163	\$ 13,881,661.36	\$ 0.080	\$ 0.013	\$ 2,293,198.63	\$ 0.067	\$ 11,588,462.73	\$ 15.72	\$ 95.16	\$ 79.44
Mar-19	144,934	155,803,861	\$ 12,426,484.88	\$ 0.080	\$ 0.017	\$ 2,702,765.91	\$ 0.062	\$ 9,723,718.97	\$ 18.65	\$ 85.74	\$ 67.09
Apr-19	144,326	125,011,152	\$ 10,027,598.39	\$ 0.080	\$ 0.018	\$ 2,225,652.39	\$ 0.062	\$ 7,801,946.00	\$ 15.42	\$ 69.48	\$ 54.06
May-19	143,074	101,384,567	\$ 8,359,199.88	\$ 0.082	\$ 0.020	\$ 2,031,789.05	\$ 0.062	\$ 6,327,410.83	\$ 14.20	\$ 58.43	\$ 44.22
Jun-19	142,370	114,622,941	\$ 9,405,632.02	\$ 0.082	\$ 0.027	\$ 3,055,521.09	\$ 0.055	\$ 6,350,110.93	\$ 21.46	\$ 66.06	\$ 44.60
Jul-19	141,434	146,231,592	\$ 11,985,766.92	\$ 0.082	\$ 0.027	\$ 3,884,536.72	\$ 0.055	\$ 8,101,230.20	\$ 27.47	\$ 84.74	\$ 57.28

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Aug-19	140,245	170,377,852	\$ 13,864,565.58	\$ 0.081	\$ 0.026	\$ 4,425,632.58	\$ 0.055	\$ 9,438,933.00	\$ 31.56	\$ 98.86	\$ 67.30
Sep-19	139,809	139,560,060	\$ 11,238,784.67	\$ 0.081	\$ 0.024	\$ 3,329,916.07	\$ 0.057	\$ 7,908,868.60	\$ 23.82	\$ 80.39	\$ 56.57
Oct-19	139,322	110,314,748	\$ 8,872,783.15	\$ 0.080	\$ 0.024	\$ 2,621,246.38	\$ 0.057	\$ 6,251,536.77	\$ 18.81	\$ 63.69	\$ 44.87
Nov-19	138,917	106,155,512	\$ 8,553,832.50	\$ 0.081	\$ 0.024	\$ 2,537,999.63	\$ 0.057	\$ 6,015,832.87	\$ 18.27	\$ 61.58	\$ 43.31
Dec-19	138,828	137,027,644	\$ 10,740,557.04	\$ 0.078	\$ 0.013	\$ 1,820,057.42	\$ 0.065	\$ 8,920,499.62	\$ 13.11	\$ 77.37	\$ 64.26
2019			\$ 133,373,103.50			\$ 33,176,269.67		\$ 100,196,833.83	\$ 233.80	\$ 936.95	\$ 703.15
Jan-20	138,443	152,568,999	\$ 12,227,537.08	\$ 0.080	\$ 0.015	\$ 2,295,295.25	\$ 0.065	\$ 9,932,241.83	\$ 16.58	\$ 88.32	\$ 71.74
Feb-20	138,226	142,327,130	\$ 11,340,853.31	\$ 0.080	\$ 0.015	\$ 2,075,357.15	\$ 0.065	\$ 9,265,496.16	\$ 15.01	\$ 82.05	\$ 67.03
Mar-20	138,333	134,694,745	\$ 10,188,156.35	\$ 0.076	\$ 0.022	\$ 2,928,109.59	\$ 0.054	\$ 7,260,046.76	\$ 21.17	\$ 73.65	\$ 52.48
Apr-20	137,509	116,058,458	\$ 9,638,033.80	\$ 0.083	\$ 0.029	\$ 3,382,482.91	\$ 0.054	\$ 6,255,550.89	\$ 24.60	\$ 70.09	\$ 45.49
May-20	136,856	111,800,731	\$ 8,824,824.34	\$ 0.079	\$ 0.025	\$ 2,798,764.94	\$ 0.054	\$ 6,026,059.40	\$ 20.45	\$ 64.48	\$ 44.03
Jun-20	136,234	116,028,619	\$ 9,194,981.49	\$ 0.079	\$ 0.026	\$ 2,974,687.23	\$ 0.054	\$ 6,220,294.26	\$ 21.84	\$ 67.49	\$ 45.66
Jul-20	135,140	149,369,283	\$ 11,829,869.01	\$ 0.079	\$ 0.026	\$ 3,822,181.75	\$ 0.054	\$ 8,007,687.26	\$ 28.28	\$ 87.54	\$ 59.25
Aug-20	134,100	171,377,073	\$ 13,544,878.06	\$ 0.079	\$ 0.025	\$ 4,357,353.18	\$ 0.054	\$ 9,187,524.88	\$ 32.49	\$ 101.01	\$ 68.51
Sep-20	133,007	147,249,630	\$ 11,564,054.82	\$ 0.079	\$ 0.021	\$ 3,086,893.62	\$ 0.058	\$ 8,477,161.20	\$ 23.21	\$ 86.94	\$ 63.73
Oct-20	131,837	99,366,822	\$ 7,919,501.03	\$ 0.080	\$ 0.022	\$ 2,198,953.09	\$ 0.058	\$ 5,720,547.94	\$ 16.68	\$ 60.07	\$ 43.39
Nov-20	130,821	95,839,871	\$ 7,694,017.29	\$ 0.080	\$ 0.023	\$ 2,176,515.92	\$ 0.058	\$ 5,517,501.37	\$ 16.64	\$ 58.81	\$ 42.18
Dec-20	129,567	121,412,325	\$ 9,659,592.82	\$ 0.080	\$ 0.018	\$ 2,163,595.87	\$ 0.062	\$ 7,495,996.95	\$ 16.70	\$ 74.55	\$ 57.85
2020			\$ 123,626,299.40			\$ 34,260,190.49		\$ 89,366,108.91	\$ 253.64	\$ 915.01	\$ 661.36
Jan-21	128,174	155,445,034	\$ 12,520,496.59	\$ 0.081	\$ 0.019	\$ 2,923,320.19	\$ 0.062	\$ 9,597,176.40	\$ 22.81	\$ 97.68	\$ 74.88
Feb-21	127,378	145,398,228	\$ 11,777,475.13	\$ 0.081	\$ 0.019	\$ 2,800,588.53	\$ 0.062	\$ 8,976,886.60	\$ 21.99	\$ 92.46	\$ 70.47
Mar-21	126,297	138,880,305	\$ 11,196,408.45	\$ 0.081	\$ 0.026	\$ 3,671,873.53	\$ 0.054	\$ 7,524,534.92	\$ 29.07	\$ 88.65	\$ 59.58
Apr-21	125,303	106,574,480	\$ 8,735,332.83	\$ 0.082	\$ 0.028	\$ 2,961,127.50	\$ 0.054	\$ 5,774,205.33	\$ 23.63	\$ 69.71	\$ 46.08
May-21	124,165	91,263,977	\$ 7,607,906.25	\$ 0.083	\$ 0.029	\$ 2,663,223.98	\$ 0.054	\$ 4,944,682.27	\$ 21.45	\$ 61.27	\$ 39.82
Jun-21	122,994	104,964,715	\$ 8,833,270.03	\$ 0.084	\$ 0.017	\$ 1,811,130.60	\$ 0.067	\$ 7,022,139.43	\$ 14.73	\$ 71.82	\$ 57.09
Jul-21	121,650	133,832,730	\$ 11,433,711.54	\$ 0.085	\$ 0.019	\$ 2,480,301.90	\$ 0.067	\$ 8,953,409.64	\$ 20.39	\$ 93.99	\$ 73.60
Aug-21	120,812	137,402,480	\$ 11,868,880.82	\$ 0.086	\$ 0.019	\$ 2,676,654.91	\$ 0.067	\$ 9,192,225.91	\$ 22.16	\$ 98.24	\$ 76.09
Sep-21	120,179	135,515,537	\$ 11,841,962.37	\$ 0.087	\$ 0.016	\$ 2,201,387.07	\$ 0.071	\$ 9,640,575.30	\$ 18.32	\$ 98.54	\$ 80.22
Oct-21	119,140	95,544,997	\$ 8,546,165.28	\$ 0.089	\$ 0.018	\$ 1,749,094.19	\$ 0.071	\$ 6,797,071.09	\$ 14.68	\$ 71.73	\$ 57.05
Nov-21	118,210	89,493,511	\$ 8,236,591.69	\$ 0.092	\$ 0.021	\$ 1,870,023.32	\$ 0.071	\$ 6,366,568.37	\$ 15.82	\$ 69.68	\$ 53.86
Dec-21	115,960	111,554,713	\$ 10,512,085.21	\$ 0.094	\$ 0.020	\$ 2,241,418.79	\$ 0.074	\$ 8,270,666.42	\$ 19.33	\$ 90.65	\$ 71.32
2021			\$ 123,110,286.19			\$ 30,050,144.50		\$ 93,060,141.69	\$ 244.37	\$ 1,004.43	\$ 760.07
TOTAL			\$ 585,371,520.29			\$ 137,235,464.02		\$ 448,136,056.27	\$ 982.35	\$ 4,148.38	\$ 3,166.03

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-1, Attach. A-C REVISED; CAUSE-PA to FE I-4, Attachment A (PTC)

CAUSE-PA Exhibit 1(a)

RESIDENTIAL SHOPPING - Penelec

August 2017- December 2021

Date	Residential Shopping Customer Count	Residential Shopping Usage (kWh)	Total Residential Shopping Charges Billed	Avg \$/kWh - Res. Shopping	Avg \$/kWh Over Default Rate	Total Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Aug-17	150,280	120,382,194	\$ 8,822,734.29	\$ 0.073	\$ 0.012	\$ 1,409,598.78	\$ 0.062	\$ 7,413,135.51	\$ 9.38	\$ 58.71	\$ 49.33
Sep-17	147,877	94,136,058	\$ 7,557,644.98	\$ 0.080	\$ 0.026	\$ 2,490,300.98	\$ 0.054	\$ 5,067,344.00	\$ 16.84	\$ 51.11	\$ 34.27
Oct-17	145,637	93,380,338	\$ 7,340,657.75	\$ 0.079	\$ 0.025	\$ 2,313,994.16	\$ 0.054	\$ 5,026,663.59	\$ 15.89	\$ 50.40	\$ 34.52
Nov-17	143,829	94,069,349	\$ 7,265,949.26	\$ 0.077	\$ 0.023	\$ 2,202,196.20	\$ 0.054	\$ 5,063,753.06	\$ 15.31	\$ 50.52	\$ 35.21
Dec-17	142,441	115,188,731	\$ 8,807,380.89	\$ 0.076	\$ 0.009	\$ 1,041,356.65	\$ 0.067	\$ 7,766,024.24	\$ 7.31	\$ 61.83	\$ 54.52
2017			\$ 39,794,367.17			\$ 9,457,446.77		\$ 30,336,920.40	\$ 64.73	\$ 272.57	\$ 207.84
Jan-18	141,122	145,990,865	\$ 11,288,593.60	\$ 0.077	\$ 0.010	\$ 1,445,889.48	\$ 0.067	\$ 9,842,704.12	\$ 10.25	\$ 79.99	\$ 69.75
Feb-18	140,147	123,391,558	\$ 9,594,287.47	\$ 0.078	\$ 0.010	\$ 1,275,228.63	\$ 0.067	\$ 8,319,058.84	\$ 9.10	\$ 68.46	\$ 59.36
Mar-18	138,798	108,505,247	\$ 8,465,343.04	\$ 0.078	\$ 0.019	\$ 2,087,404.62	\$ 0.059	\$ 6,377,938.42	\$ 15.04	\$ 60.99	\$ 45.95
Apr-18	138,323	105,267,601	\$ 7,677,504.62	\$ 0.073	\$ 0.014	\$ 1,489,875.03	\$ 0.059	\$ 6,187,629.59	\$ 10.77	\$ 55.50	\$ 44.73
May-18	136,595	87,221,432	\$ 7,401,920.97	\$ 0.085	\$ 0.026	\$ 2,275,045.20	\$ 0.059	\$ 5,126,875.77	\$ 16.66	\$ 54.19	\$ 37.53
Jun-18	134,666	89,843,348	\$ 7,198,567.79	\$ 0.080	\$ 0.018	\$ 1,607,616.24	\$ 0.062	\$ 5,590,951.55	\$ 11.94	\$ 53.45	\$ 41.52
Jul-18	132,983	104,666,084	\$ 8,326,676.56	\$ 0.080	\$ 0.017	\$ 1,813,306.15	\$ 0.062	\$ 6,513,370.41	\$ 13.64	\$ 62.61	\$ 48.98
Aug-18	131,796	105,729,201	\$ 8,412,515.64	\$ 0.080	\$ 0.017	\$ 1,832,987.46	\$ 0.062	\$ 6,579,528.18	\$ 13.91	\$ 63.83	\$ 49.92
Sep-18	130,396	108,065,512	\$ 8,561,502.85	\$ 0.079	\$ 0.020	\$ 2,112,153.09	\$ 0.060	\$ 6,449,349.76	\$ 16.20	\$ 65.66	\$ 49.46
Oct-18	129,165	86,540,791	\$ 6,819,730.91	\$ 0.079	\$ 0.019	\$ 1,654,976.50	\$ 0.060	\$ 5,164,754.41	\$ 12.81	\$ 52.80	\$ 39.99
Nov-18	128,384	87,343,055	\$ 7,031,103.70	\$ 0.080	\$ 0.021	\$ 1,818,470.18	\$ 0.060	\$ 5,212,633.52	\$ 14.16	\$ 54.77	\$ 40.60
Dec-18	127,834	106,467,634	\$ 8,461,233.39	\$ 0.079	\$ 0.017	\$ 1,766,548.56	\$ 0.063	\$ 6,694,684.83	\$ 13.82	\$ 66.19	\$ 52.37
2018			\$ 99,238,980.54			\$ 21,179,501.16		\$ 78,059,479.38	\$ 158.29	\$ 738.44	\$ 580.16
Jan-19	126,855	119,151,572	\$ 9,501,225.08	\$ 0.080	\$ 0.017	\$ 2,008,974.23	\$ 0.063	\$ 7,492,250.85	\$ 15.84	\$ 74.90	\$ 59.06
Feb-19	125,723	115,245,099	\$ 9,224,247.19	\$ 0.080	\$ 0.017	\$ 1,977,635.36	\$ 0.063	\$ 7,246,611.83	\$ 15.73	\$ 73.37	\$ 57.64
Mar-19	125,019	105,079,739	\$ 8,419,709.37	\$ 0.080	\$ 0.023	\$ 2,380,776.77	\$ 0.057	\$ 6,038,932.60	\$ 19.04	\$ 67.35	\$ 48.30
Apr-19	123,957	88,216,173	\$ 7,067,285.64	\$ 0.080	\$ 0.023	\$ 1,997,502.18	\$ 0.057	\$ 5,069,783.46	\$ 16.11	\$ 57.01	\$ 40.90
May-19	122,454	74,620,997	\$ 6,080,110.08	\$ 0.081	\$ 0.024	\$ 1,791,641.38	\$ 0.057	\$ 4,288,468.70	\$ 14.63	\$ 49.65	\$ 35.02
Jun-19	121,691	73,254,887	\$ 5,969,110.98	\$ 0.081	\$ 0.025	\$ 1,817,023.98	\$ 0.057	\$ 4,152,087.00	\$ 14.93	\$ 49.05	\$ 34.12
Jul-19	121,235	89,797,112	\$ 7,287,650.00	\$ 0.081	\$ 0.024	\$ 2,197,949.69	\$ 0.057	\$ 5,089,700.31	\$ 18.13	\$ 60.11	\$ 41.98

Aug-19	120,523	101,549,959	\$ 8,182,282.21	\$ 0.081	\$ 0.024	\$ 2,426,430.53	\$ 0.057	\$ 5,755,851.68	\$ 20.13	\$ 67.89	\$ 47.76
Sep-19	120,295	86,852,679	\$ 6,915,048.15	\$ 0.080	\$ 0.028	\$ 2,400,445.90	\$ 0.052	\$ 4,514,602.25	\$ 19.95	\$ 57.48	\$ 37.53
Oct-19	119,907	75,908,071	\$ 6,050,561.16	\$ 0.080	\$ 0.028	\$ 2,104,859.63	\$ 0.052	\$ 3,945,701.53	\$ 17.55	\$ 50.46	\$ 32.91
Nov-19	119,685	77,938,524	\$ 6,226,653.00	\$ 0.080	\$ 0.028	\$ 2,175,408.52	\$ 0.052	\$ 4,051,244.48	\$ 18.18	\$ 52.03	\$ 33.85
Dec-19	119,755	94,699,780	\$ 7,403,826.69	\$ 0.078	\$ 0.014	\$ 1,300,425.87	\$ 0.064	\$ 6,103,400.82	\$ 10.86	\$ 61.82	\$ 50.97
2019			\$ 88,327,709.55			\$ 24,579,074.05		\$ 63,748,635.50	\$ 201.09	\$ 721.13	\$ 520.04
Jan-20	119,210	101,263,130	\$ 8,110,096.87	\$ 0.080	\$ 0.016	\$ 1,583,688.14	\$ 0.064	\$ 6,526,408.73	\$ 13.28	\$ 68.03	\$ 54.75
Feb-20	119,510	96,035,967	\$ 7,637,745.40	\$ 0.080	\$ 0.015	\$ 1,448,227.33	\$ 0.064	\$ 6,189,518.07	\$ 12.12	\$ 63.91	\$ 51.79
Mar-20	119,661	93,648,659	\$ 7,098,715.81	\$ 0.076	\$ 0.022	\$ 2,037,942.28	\$ 0.054	\$ 5,060,773.53	\$ 17.03	\$ 59.32	\$ 42.29
Apr-20	119,008	82,256,255	\$ 6,731,614.34	\$ 0.082	\$ 0.028	\$ 2,286,486.32	\$ 0.054	\$ 4,445,128.02	\$ 19.21	\$ 56.56	\$ 37.35
May-20	118,384	80,069,010	\$ 6,275,883.48	\$ 0.078	\$ 0.024	\$ 1,948,954.18	\$ 0.054	\$ 4,326,929.30	\$ 16.46	\$ 53.01	\$ 36.55
Jun-20	118,039	78,762,704	\$ 6,204,619.45	\$ 0.079	\$ 0.023	\$ 1,847,466.66	\$ 0.055	\$ 4,357,152.79	\$ 15.65	\$ 52.56	\$ 36.91
Jul-20	117,401	92,799,926	\$ 7,331,025.63	\$ 0.079	\$ 0.024	\$ 2,197,333.72	\$ 0.055	\$ 5,133,691.91	\$ 18.72	\$ 62.44	\$ 43.73
Aug-20	116,535	104,908,089	\$ 8,286,298.19	\$ 0.079	\$ 0.024	\$ 2,482,782.71	\$ 0.055	\$ 5,803,515.48	\$ 21.31	\$ 71.11	\$ 49.80
Sep-20	116,111	91,938,273	\$ 7,219,309.79	\$ 0.079	\$ 0.023	\$ 2,072,605.27	\$ 0.056	\$ 5,146,704.52	\$ 17.85	\$ 62.18	\$ 44.33
Oct-20	115,093	70,232,088	\$ 5,592,926.42	\$ 0.080	\$ 0.024	\$ 1,661,334.13	\$ 0.056	\$ 3,931,592.29	\$ 14.43	\$ 48.59	\$ 34.16
Nov-20	114,100	70,535,512	\$ 5,669,959.07	\$ 0.080	\$ 0.024	\$ 1,721,381.11	\$ 0.056	\$ 3,948,577.96	\$ 15.09	\$ 49.69	\$ 34.61
Dec-20	112,695	86,281,134	\$ 6,863,512.80	\$ 0.080	\$ 0.023	\$ 1,973,960.94	\$ 0.057	\$ 4,889,551.86	\$ 17.52	\$ 60.90	\$ 43.39
2020			\$ 83,021,707.25			\$ 23,262,162.79		\$ 59,759,544.46	\$ 198.67	\$ 708.32	\$ 509.65
Jan-21	111,514	104,648,938	\$ 8,521,160.14	\$ 0.081	\$ 0.025	\$ 2,590,704.82	\$ 0.057	\$ 5,930,455.32	\$ 23.23	\$ 76.41	\$ 53.18
Feb-21	110,503	97,097,113	\$ 8,077,143.21	\$ 0.083	\$ 0.027	\$ 2,574,649.82	\$ 0.057	\$ 5,502,493.39	\$ 23.30	\$ 73.09	\$ 49.79
Mar-21	109,460	91,589,354	\$ 7,491,874.43	\$ 0.082	\$ 0.032	\$ 2,929,808.71	\$ 0.050	\$ 4,562,065.72	\$ 26.77	\$ 68.44	\$ 41.68
Apr-21	108,596	74,192,936	\$ 6,180,627.62	\$ 0.083	\$ 0.033	\$ 2,485,077.48	\$ 0.050	\$ 3,695,550.14	\$ 22.88	\$ 56.91	\$ 34.03
May-21	107,507	66,094,761	\$ 5,594,164.02	\$ 0.085	\$ 0.035	\$ 2,301,983.97	\$ 0.050	\$ 3,292,180.05	\$ 21.41	\$ 52.04	\$ 30.62
Jun-21	106,170	69,809,293	\$ 6,001,106.55	\$ 0.086	\$ 0.021	\$ 1,490,030.04	\$ 0.065	\$ 4,511,076.51	\$ 14.03	\$ 56.52	\$ 42.49
Jul-21	105,109	83,381,744	\$ 7,293,622.92	\$ 0.087	\$ 0.023	\$ 1,905,494.62	\$ 0.065	\$ 5,388,128.30	\$ 18.13	\$ 69.39	\$ 51.26
Aug-21	104,273	84,421,239	\$ 7,458,106.02	\$ 0.088	\$ 0.024	\$ 2,002,805.56	\$ 0.065	\$ 5,455,300.46	\$ 19.21	\$ 71.52	\$ 52.32
Sep-21	103,174	87,061,499	\$ 7,770,428.18	\$ 0.089	\$ 0.022	\$ 1,884,200.23	\$ 0.068	\$ 5,886,227.95	\$ 18.26	\$ 75.31	\$ 57.05
Oct-21	102,183	64,059,816	\$ 5,889,906.14	\$ 0.092	\$ 0.024	\$ 1,558,821.98	\$ 0.068	\$ 4,331,084.16	\$ 15.26	\$ 57.64	\$ 42.39
Nov-21	100,987	64,543,684	\$ 6,121,045.26	\$ 0.095	\$ 0.027	\$ 1,757,246.78	\$ 0.068	\$ 4,363,798.48	\$ 17.40	\$ 60.61	\$ 43.21
Dec-21	99,375	76,989,638	\$ 7,508,995.11	\$ 0.098	\$ 0.032	\$ 2,499,279.37	\$ 0.065	\$ 5,009,715.74	\$ 25.15	\$ 75.56	\$ 50.41
2021			\$ 83,908,179.60			\$ 25,980,103.38		\$ 57,928,076.22	\$ 245.03	\$ 793.47	\$ 548.44
TOTAL			\$ 394,290,944.11			\$ 104,458,288.14		\$ 289,832,655.97	\$ 867.81	\$ 3,233.94	\$ 2,366.12

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-1, Attach. A-C REVISED; CAUSE-PA to FE I-4, Attachment A (PTC)

RESIDENTIAL SHOPPING - Penn Power

August 2017 - December 2021

Date	Residential Shopping Customer Count	Residential Shopping Usage (kWh)	Total Residential Shopping Charges Billed	Avg \$/kWh - Res. Shopping	Avg \$/kWh Over Default Rate	Total Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Aug-17	39,516	40,219,504	\$ 3,288,412.93	\$ 0.082	\$ 0.014	\$ 577,216.17	\$ 0.067	\$ 2,711,196.76	\$ 14.61	\$ 83.22	\$ 68.61
Sep-17	38,934	33,428,655	\$ 2,752,932.52	\$ 0.082	\$ 0.023	\$ 761,921.83	\$ 0.060	\$ 1,991,010.69	\$ 19.57	\$ 70.71	\$ 51.14
Oct-17	38,229	31,816,342	\$ 2,647,689.02	\$ 0.083	\$ 0.024	\$ 752,707.69	\$ 0.060	\$ 1,894,981.33	\$ 19.69	\$ 69.26	\$ 49.57
Nov-17	37,887	30,855,476	\$ 2,561,312.30	\$ 0.083	\$ 0.023	\$ 723,560.15	\$ 0.060	\$ 1,837,752.15	\$ 19.10	\$ 67.60	\$ 48.51
Dec-17	37,636	41,402,461	\$ 3,406,280.51	\$ 0.082	\$ 0.010	\$ 424,475.27	\$ 0.072	\$ 2,981,805.24	\$ 11.28	\$ 90.51	\$ 79.23
2017			\$ 14,656,627.28			\$ 3,239,881.10		\$ 11,416,746.18	\$ 84.24	\$ 381.29	\$ 297.05
18-Jan	37,385	54,490,000	\$ 4,459,424.67	\$ 0.082	\$ 0.010	\$ 535,054.87	\$ 0.072	\$ 3,924,369.80	\$ 14.31	\$ 119.28	\$ 104.97
Feb-18	37,015	43,592,121	\$ 3,560,319.44	\$ 0.082	\$ 0.010	\$ 420,814.89	\$ 0.072	\$ 3,139,504.55	\$ 11.37	\$ 96.19	\$ 84.82
Mar-18	36,798	36,035,663	\$ 2,995,038.39	\$ 0.083	\$ 0.017	\$ 617,044.99	\$ 0.066	\$ 2,377,993.40	\$ 16.77	\$ 81.39	\$ 64.62
Apr-18	36,550	35,591,684	\$ 2,734,107.87	\$ 0.077	\$ 0.011	\$ 385,412.64	\$ 0.066	\$ 2,348,695.23	\$ 10.54	\$ 74.80	\$ 64.26
May-18	36,225	28,360,431	\$ 2,661,700.41	\$ 0.094	\$ 0.028	\$ 790,195.57	\$ 0.066	\$ 1,871,504.84	\$ 21.81	\$ 73.48	\$ 51.66
Jun-18	35,970	33,908,204	\$ 2,930,522.70	\$ 0.086	\$ 0.018	\$ 616,626.86	\$ 0.068	\$ 2,313,895.84	\$ 17.14	\$ 81.47	\$ 64.33
Jul-18	35,738	38,508,161	\$ 3,302,846.61	\$ 0.086	\$ 0.018	\$ 675,049.70	\$ 0.068	\$ 2,627,796.91	\$ 18.89	\$ 92.42	\$ 73.53
Aug-18	35,431	38,391,404	\$ 3,293,461.39	\$ 0.086	\$ 0.018	\$ 673,631.98	\$ 0.068	\$ 2,619,829.41	\$ 19.01	\$ 92.95	\$ 73.94
Sep-18	35,162	37,783,147	\$ 3,256,014.40	\$ 0.086	\$ 0.020	\$ 752,503.08	\$ 0.066	\$ 2,503,511.32	\$ 21.40	\$ 92.60	\$ 71.20
Oct-18	35,014	29,977,895	\$ 2,555,477.64	\$ 0.085	\$ 0.019	\$ 569,142.32	\$ 0.066	\$ 1,986,335.32	\$ 16.25	\$ 72.98	\$ 56.73
Nov-18	34,904	29,689,988	\$ 2,525,441.33	\$ 0.085	\$ 0.019	\$ 558,182.73	\$ 0.066	\$ 1,967,258.60	\$ 15.99	\$ 72.35	\$ 56.36
Dec-18	34,727	37,605,718	\$ 3,220,999.93	\$ 0.086	\$ 0.009	\$ 320,094.84	\$ 0.077	\$ 2,900,905.09	\$ 9.22	\$ 92.75	\$ 83.53
2018			\$ 37,495,354.78			\$ 6,913,754.46		\$ 30,581,600.32	\$ 192.72	\$ 1,042.68	\$ 849.96
Jan-19	34,616	41,227,709	\$ 3,537,460.44	\$ 0.086	\$ 0.009	\$ 357,154.97	\$ 0.077	\$ 3,180,305.47	\$ 10.32	\$ 102.19	\$ 91.87
Feb-19	34,570	43,222,824	\$ 3,696,464.82	\$ 0.086	\$ 0.008	\$ 362,256.18	\$ 0.077	\$ 3,334,208.64	\$ 10.48	\$ 106.93	\$ 96.45
Mar-19	34,367	37,171,716	\$ 3,167,068.17	\$ 0.085	\$ 0.021	\$ 782,874.31	\$ 0.064	\$ 2,384,193.86	\$ 22.78	\$ 92.15	\$ 69.37
Apr-19	34,128	30,115,343	\$ 2,618,917.76	\$ 0.087	\$ 0.023	\$ 687,319.66	\$ 0.064	\$ 1,931,598.10	\$ 20.14	\$ 76.74	\$ 56.60
May-19	34,035	24,880,378	\$ 2,213,358.96	\$ 0.089	\$ 0.025	\$ 617,531.52	\$ 0.064	\$ 1,595,827.44	\$ 18.14	\$ 65.03	\$ 46.89
Jun-19	33,982	26,828,981	\$ 2,398,937.43	\$ 0.089	\$ 0.027	\$ 720,516.38	\$ 0.063	\$ 1,678,421.05	\$ 21.20	\$ 70.59	\$ 49.39
Jul-19	33,959	35,066,910	\$ 3,112,638.43	\$ 0.089	\$ 0.026	\$ 918,852.54	\$ 0.063	\$ 2,193,785.89	\$ 27.06	\$ 91.66	\$ 64.60
Aug-19	33,747	38,240,203	\$ 3,371,504.89	\$ 0.088	\$ 0.026	\$ 979,197.79	\$ 0.063	\$ 2,392,307.10	\$ 29.02	\$ 99.91	\$ 70.89
Sep-19	33,607	32,404,129	\$ 2,839,146.22	\$ 0.088	\$ 0.025	\$ 820,044.94	\$ 0.062	\$ 2,019,101.28	\$ 24.40	\$ 84.48	\$ 60.08
Oct-19	33,447	26,819,997	\$ 2,364,998.51	\$ 0.088	\$ 0.026	\$ 693,844.50	\$ 0.062	\$ 1,671,154.01	\$ 20.74	\$ 70.71	\$ 49.96
Nov-19	33,380	26,052,624	\$ 2,293,689.70	\$ 0.088	\$ 0.026	\$ 670,350.70	\$ 0.062	\$ 1,623,339.00	\$ 20.08	\$ 68.71	\$ 48.63
Dec-19	33,517	34,531,722	\$ 2,962,272.45	\$ 0.086	\$ 0.010	\$ 347,530.46	\$ 0.076	\$ 2,614,741.99	\$ 10.37	\$ 88.38	\$ 78.01

2019			\$ 34,576,457.78			\$ 7,957,473.93		\$ 26,618,983.85	\$ 234.73	\$ 1,017.49	\$ 782.75
Jan-20	33,580	37,873,933	\$ 3,250,551.38	\$ 0.086	\$ 0.010	\$ 382,737.17	\$ 0.076	\$ 2,867,814.21	\$ 11.40	\$ 96.80	\$ 85.40
Feb-20	33,829	34,150,153	\$ 2,909,318.75	\$ 0.085	\$ 0.009	\$ 323,469.16	\$ 0.076	\$ 2,585,849.59	\$ 9.56	\$ 86.00	\$ 76.44
Mar-20	33,956	33,432,142	\$ 2,841,512.58	\$ 0.085	\$ 0.022	\$ 746,320.24	\$ 0.063	\$ 2,095,192.34	\$ 21.98	\$ 83.68	\$ 61.70
Apr-20	33,801	29,130,128	\$ 2,505,422.21	\$ 0.086	\$ 0.023	\$ 679,837.09	\$ 0.063	\$ 1,825,585.12	\$ 20.11	\$ 74.12	\$ 54.01
May-20	33,550	28,662,406	\$ 2,468,419.63	\$ 0.086	\$ 0.023	\$ 672,146.65	\$ 0.063	\$ 1,796,272.98	\$ 20.03	\$ 73.57	\$ 53.54
Jun-20	33,463	29,660,797	\$ 2,601,270.97	\$ 0.088	\$ 0.021	\$ 618,743.30	\$ 0.067	\$ 1,982,527.67	\$ 18.49	\$ 77.74	\$ 59.25
Jul-20	33,194	36,051,917	\$ 3,207,630.18	\$ 0.089	\$ 0.022	\$ 797,920.05	\$ 0.067	\$ 2,409,710.13	\$ 24.04	\$ 96.63	\$ 72.59
Aug-20	32,987	40,121,383	\$ 3,581,456.77	\$ 0.089	\$ 0.022	\$ 899,743.53	\$ 0.067	\$ 2,681,713.24	\$ 27.28	\$ 108.57	\$ 81.30
Sep-20	32,706	34,668,576	\$ 3,077,256.52	\$ 0.089	\$ 0.024	\$ 842,173.43	\$ 0.064	\$ 2,235,083.09	\$ 25.75	\$ 94.09	\$ 68.34
Oct-20	32,414	26,147,408	\$ 2,326,880.59	\$ 0.089	\$ 0.025	\$ 641,157.20	\$ 0.064	\$ 1,685,723.39	\$ 19.78	\$ 71.79	\$ 52.01
Nov-20	32,237	25,180,124	\$ 2,246,470.47	\$ 0.089	\$ 0.025	\$ 623,107.88	\$ 0.064	\$ 1,623,362.59	\$ 19.33	\$ 69.69	\$ 50.36
Dec-20	31,914	31,099,827	\$ 2,749,280.11	\$ 0.088	\$ 0.024	\$ 748,006.24	\$ 0.064	\$ 2,001,273.87	\$ 23.44	\$ 86.15	\$ 62.71
2020			\$ 33,765,470.16			\$ 7,975,361.93		\$ 25,790,108.23	\$ 241.19	\$ 1,018.83	\$ 777.64
Jan-21	31,468	38,341,900	\$ 3,382,026.51	\$ 0.088	\$ 0.024	\$ 914,725.25	\$ 0.064	\$ 2,467,301.27	\$ 29.07	\$ 107.48	\$ 78.41
Feb-21	31,131	36,802,089	\$ 3,216,006.72	\$ 0.087	\$ 0.023	\$ 847,792.29	\$ 0.064	\$ 2,368,214.43	\$ 27.23	\$ 103.31	\$ 76.07
Mar-21	30,724	33,000,544	\$ 2,872,563.82	\$ 0.087	\$ 0.030	\$ 984,602.70	\$ 0.057	\$ 1,887,961.12	\$ 32.05	\$ 93.50	\$ 61.45
Apr-21	30,438	24,326,348	\$ 2,184,154.82	\$ 0.090	\$ 0.033	\$ 792,444.45	\$ 0.057	\$ 1,391,710.37	\$ 26.03	\$ 71.76	\$ 45.72
May-21	30,058	23,582,313	\$ 2,145,722.59	\$ 0.091	\$ 0.034	\$ 796,578.46	\$ 0.057	\$ 1,349,144.13	\$ 26.50	\$ 71.39	\$ 44.88
Jun-21	29,701	26,320,304	\$ 2,458,845.25	\$ 0.093	\$ 0.021	\$ 565,099.38	\$ 0.072	\$ 1,893,745.87	\$ 19.03	\$ 82.79	\$ 63.76
Jul-21	29,417	30,907,546	\$ 2,929,142.49	\$ 0.095	\$ 0.023	\$ 705,344.56	\$ 0.072	\$ 2,223,797.93	\$ 23.98	\$ 99.57	\$ 75.60
Aug-21	28,858	30,886,034	\$ 2,961,176.34	\$ 0.096	\$ 0.024	\$ 738,926.19	\$ 0.072	\$ 2,222,250.15	\$ 25.61	\$ 102.61	\$ 77.01
Sep-21	28,784	30,970,209	\$ 2,943,734.22	\$ 0.095	\$ 0.018	\$ 572,345.32	\$ 0.077	\$ 2,371,388.90	\$ 19.88	\$ 102.27	\$ 82.39
Oct-21	28,707	23,111,565	\$ 2,262,174.02	\$ 0.098	\$ 0.021	\$ 492,521.49	\$ 0.077	\$ 1,769,652.53	\$ 17.16	\$ 78.80	\$ 61.65
Nov-21	28,639	21,545,339	\$ 2,141,043.33	\$ 0.099	\$ 0.023	\$ 491,316.72	\$ 0.077	\$ 1,649,726.61	\$ 17.16	\$ 74.76	\$ 57.60
Dec-21	28,307	27,387,877	\$ 2,765,859.20	\$ 0.101	\$ 0.025	\$ 686,297.70	\$ 0.076	\$ 2,079,561.50	\$ 24.24	\$ 97.71	\$ 73.46
2021			\$ 32,262,449.31			\$ 8,587,994.50		\$ 23,674,454.81	\$ 287.93	\$ 1,085.93	\$ 798.00
TOTAL			\$ 152,756,359.31			\$ 34,674,465.93		\$ 118,081,893.38	\$ 1,040.81	\$ 4,546.22	\$ 3,505.40

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-1, Attach. A-C REVISED; CAUSE-PA to FE I-4, Attachment A (PTC)

RESIDENTIAL SHOPPING - West Penn Power

August 2017 - December 2021

Date	Residential Shopping Customer Count	Residential Shopping Usage (kWh)	Total Residential Shopping Charges Billed	Avg \$/kWh - Residential Shopping	Avg \$/kWh Over Default Rate	Total Residential Charges Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Aug-17	169,770	171,560,332	\$ 12,747,534.57	\$ 0.074	\$ 0.008	\$ 1,429,699.47	\$ 0.066	\$ 11,317,835.10	\$ 8.42	\$ 75.09	\$ 66.67
Sep-17	168,784	146,538,225	\$ 10,921,565.39	\$ 0.075	\$ 0.012	\$ 1,705,776.42	\$ 0.063	\$ 9,215,788.97	\$ 10.11	\$ 64.71	\$ 54.60
Oct-17	167,975	140,126,546	\$ 10,561,417.42	\$ 0.075	\$ 0.012	\$ 1,748,858.94	\$ 0.063	\$ 8,812,558.48	\$ 10.41	\$ 62.87	\$ 52.46
Nov-17	167,270	132,231,177	\$ 9,920,652.12	\$ 0.075	\$ 0.012	\$ 1,604,633.40	\$ 0.063	\$ 8,316,018.72	\$ 9.59	\$ 59.31	\$ 49.72
Dec-17	166,071	177,793,112	\$ 13,274,695.22	\$ 0.075	\$ 0.013	\$ 2,342,196.76	\$ 0.061	\$ 10,932,498.46	\$ 14.10	\$ 79.93	\$ 65.83
2017			\$ 57,425,864.72			\$ 8,831,164.99		\$ 48,594,699.73	\$ 52.64	\$ 341.91	\$ 289.28
18-Jan	164,670	243,126,652	\$ 18,089,703.15	\$ 0.074	\$ 0.013	\$ 3,139,845.32	\$ 0.061	\$ 14,949,857.83	\$ 19.07	\$ 109.85	\$ 90.79
Feb-18	162,689	185,154,831	\$ 13,781,969.54	\$ 0.074	\$ 0.013	\$ 2,396,798.98	\$ 0.061	\$ 11,385,170.56	\$ 14.73	\$ 84.71	\$ 69.98
Mar-18	161,510	161,052,003	\$ 12,150,770.24	\$ 0.075	\$ 0.015	\$ 2,350,755.86	\$ 0.061	\$ 9,800,014.38	\$ 14.55	\$ 75.23	\$ 60.68
Apr-18	160,235	155,835,887	\$ 10,979,411.86	\$ 0.070	\$ 0.010	\$ 1,496,798.14	\$ 0.061	\$ 9,482,613.72	\$ 9.34	\$ 68.52	\$ 59.18
May-18	158,489	124,409,789	\$ 10,459,650.37	\$ 0.084	\$ 0.023	\$ 2,889,314.71	\$ 0.061	\$ 7,570,335.66	\$ 18.23	\$ 66.00	\$ 47.77
Jun-18	157,057	150,257,440	\$ 11,704,272.85	\$ 0.078	\$ 0.012	\$ 1,847,384.79	\$ 0.066	\$ 9,856,888.06	\$ 11.76	\$ 74.52	\$ 62.76
Jul-18	156,454	170,698,440	\$ 13,207,821.96	\$ 0.077	\$ 0.012	\$ 2,010,004.30	\$ 0.066	\$ 11,197,817.66	\$ 12.85	\$ 84.42	\$ 71.57
Aug-18	154,834	164,788,242	\$ 12,590,978.60	\$ 0.076	\$ 0.011	\$ 1,780,869.92	\$ 0.066	\$ 10,810,108.68	\$ 11.50	\$ 81.32	\$ 69.82
Sep-18	154,039	167,682,735	\$ 12,888,558.64	\$ 0.077	\$ 0.021	\$ 3,506,709.62	\$ 0.056	\$ 9,381,849.02	\$ 22.77	\$ 83.67	\$ 60.91
Oct-18	153,214	134,468,502	\$ 10,259,627.12	\$ 0.076	\$ 0.020	\$ 2,736,114.43	\$ 0.056	\$ 7,523,512.69	\$ 17.86	\$ 66.96	\$ 49.10
Nov-18	152,870	131,611,399	\$ 10,039,693.61	\$ 0.076	\$ 0.020	\$ 2,676,035.84	\$ 0.056	\$ 7,363,657.77	\$ 17.51	\$ 65.67	\$ 48.17
Dec-18	152,466	162,690,547	\$ 12,591,966.65	\$ 0.077	\$ 0.014	\$ 2,254,609.29	\$ 0.064	\$ 10,337,357.36	\$ 14.79	\$ 82.59	\$ 67.80
2018			\$ 148,744,424.59			\$ 29,085,241.19		\$ 119,659,183.40	\$ 184.95	\$ 943.48	\$ 758.52
Jan-19	151,571	186,457,899	\$ 14,399,451.93	\$ 0.077	\$ 0.014	\$ 2,551,917.03	\$ 0.064	\$ 11,847,534.90	\$ 16.84	\$ 95.00	\$ 78.16
Feb-19	151,077	189,522,828	\$ 14,597,197.03	\$ 0.077	\$ 0.013	\$ 2,554,916.54	\$ 0.064	\$ 12,042,280.49	\$ 16.91	\$ 96.62	\$ 79.71
Mar-19	150,201	162,661,514	\$ 12,478,169.01	\$ 0.077	\$ 0.016	\$ 2,568,829.58	\$ 0.061	\$ 9,909,339.43	\$ 17.10	\$ 83.08	\$ 65.97
Apr-19	149,335	130,673,558	\$ 10,175,586.74	\$ 0.078	\$ 0.017	\$ 2,214,953.59	\$ 0.061	\$ 7,960,633.15	\$ 14.83	\$ 68.14	\$ 53.31
May-19	148,263	107,407,669	\$ 8,516,845.95	\$ 0.079	\$ 0.018	\$ 1,973,570.75	\$ 0.061	\$ 6,543,275.20	\$ 13.31	\$ 57.44	\$ 44.13
Jun-19	147,487	123,011,936	\$ 9,711,438.16	\$ 0.079	\$ 0.024	\$ 2,924,869.65	\$ 0.055	\$ 6,786,568.51	\$ 19.83	\$ 65.85	\$ 46.01
Jul-19	146,490	153,197,989	\$ 12,096,674.13	\$ 0.079	\$ 0.024	\$ 3,644,741.08	\$ 0.055	\$ 8,451,933.05	\$ 24.88	\$ 82.58	\$ 57.70

Aug-19	145,231	169,611,766	\$ 13,214,451.43	\$ 0.078	\$ 0.023	\$ 3,856,970.30	\$ 0.055	\$ 9,357,481.13	\$ 26.56	\$ 90.99	\$ 64.43
Sep-19	144,712	146,777,667	\$ 11,289,853.01	\$ 0.077	\$ 0.024	\$ 3,454,861.15	\$ 0.053	\$ 7,834,991.86	\$ 23.87	\$ 78.02	\$ 54.14
Oct-19	144,631	119,399,862	\$ 9,197,424.56	\$ 0.077	\$ 0.024	\$ 2,823,859.93	\$ 0.053	\$ 6,373,564.63	\$ 19.52	\$ 63.59	\$ 44.07
Nov-19	144,769	112,861,888	\$ 8,718,941.60	\$ 0.077	\$ 0.024	\$ 2,694,374.02	\$ 0.053	\$ 6,024,567.58	\$ 18.61	\$ 60.23	\$ 41.62
Dec-19	145,003	149,271,195	\$ 11,249,447.73	\$ 0.075	\$ 0.018	\$ 2,651,426.90	\$ 0.058	\$ 8,598,020.83	\$ 18.29	\$ 77.58	\$ 59.30
2019			\$ 135,645,481.28			\$ 33,915,290.50		\$ 101,730,190.78	\$ 230.56	\$ 919.11	\$ 688.55
Jan-20	144,705	165,092,061	\$ 12,578,212.05	\$ 0.076	\$ 0.019	\$ 3,068,909.34	\$ 0.058	\$ 9,509,302.71	\$ 21.21	\$ 86.92	\$ 65.72
Feb-20	144,669	147,479,110	\$ 11,153,807.00	\$ 0.076	\$ 0.018	\$ 2,659,010.26	\$ 0.058	\$ 8,494,796.74	\$ 18.38	\$ 77.10	\$ 58.72
Mar-20	144,541	141,554,288	\$ 10,634,879.46	\$ 0.075	\$ 0.019	\$ 2,655,464.25	\$ 0.056	\$ 7,979,415.21	\$ 18.37	\$ 73.58	\$ 55.21
Apr-20	144,107	120,628,996	\$ 9,313,170.24	\$ 0.077	\$ 0.021	\$ 2,513,313.74	\$ 0.056	\$ 6,799,856.50	\$ 17.44	\$ 64.63	\$ 47.19
May-20	143,537	119,931,357	\$ 9,159,375.67	\$ 0.076	\$ 0.020	\$ 2,398,845.08	\$ 0.056	\$ 6,760,530.59	\$ 16.71	\$ 63.81	\$ 47.10
Jun-20	142,912	125,303,451	\$ 9,636,210.33	\$ 0.077	\$ 0.026	\$ 3,214,408.47	\$ 0.051	\$ 6,421,801.86	\$ 22.49	\$ 67.43	\$ 44.94
Jul-20	141,729	154,466,262	\$ 11,873,502.68	\$ 0.077	\$ 0.026	\$ 3,957,106.75	\$ 0.051	\$ 7,916,395.93	\$ 27.92	\$ 83.78	\$ 55.86
Aug-20	140,228	176,789,970	\$ 13,524,860.73	\$ 0.077	\$ 0.025	\$ 4,464,374.77	\$ 0.051	\$ 9,060,485.96	\$ 31.84	\$ 96.45	\$ 64.61
Sep-20	139,624	153,737,619	\$ 11,632,304.68	\$ 0.076	\$ 0.027	\$ 4,112,997.73	\$ 0.049	\$ 7,519,306.95	\$ 29.46	\$ 83.31	\$ 53.85
Oct-20	138,301	113,421,135	\$ 8,656,472.29	\$ 0.076	\$ 0.027	\$ 3,109,044.58	\$ 0.049	\$ 5,547,427.71	\$ 22.48	\$ 62.59	\$ 40.11
Nov-20	136,729	105,700,474	\$ 8,124,908.74	\$ 0.077	\$ 0.028	\$ 2,955,098.56	\$ 0.049	\$ 5,169,810.18	\$ 21.61	\$ 59.42	\$ 37.81
Dec-20	134,954	130,972,757	\$ 9,966,468.67	\$ 0.076	\$ 0.024	\$ 3,158,504.76	\$ 0.052	\$ 6,807,963.91	\$ 23.40	\$ 73.85	\$ 50.45
2020			\$ 126,254,172.54			\$ 38,267,078.27		\$ 87,987,094.27	\$ 271.32	\$ 892.87	\$ 621.55
Jan-21	133,410	163,147,850	\$ 12,831,979.87	\$ 0.079	\$ 0.027	\$ 4,351,554.63	\$ 0.052	\$ 8,480,425.24	\$ 32.62	\$ 96.18	\$ 63.57
Feb-21	132,256	156,918,210	\$ 12,436,789.10	\$ 0.079	\$ 0.027	\$ 4,280,180.54	\$ 0.052	\$ 8,156,608.56	\$ 32.36	\$ 94.04	\$ 61.67
Mar-21	131,050	141,298,561	\$ 11,234,833.19	\$ 0.080	\$ 0.028	\$ 3,952,305.36	\$ 0.052	\$ 7,282,527.83	\$ 30.16	\$ 85.73	\$ 55.57
Apr-21	130,198	103,062,487	\$ 8,402,134.63	\$ 0.082	\$ 0.030	\$ 3,090,294.05	\$ 0.052	\$ 5,311,840.58	\$ 23.74	\$ 64.53	\$ 40.80
May-21	129,192	99,720,196	\$ 8,300,246.60	\$ 0.083	\$ 0.032	\$ 3,160,667.70	\$ 0.052	\$ 5,139,578.90	\$ 24.46	\$ 64.25	\$ 39.78
Jun-21	127,839	111,488,536	\$ 9,399,567.54	\$ 0.084	\$ 0.027	\$ 3,036,916.79	\$ 0.057	\$ 6,362,650.75	\$ 23.76	\$ 73.53	\$ 49.77
Jul-21	126,150	134,695,539	\$ 11,474,268.38	\$ 0.085	\$ 0.028	\$ 3,787,193.97	\$ 0.057	\$ 7,687,074.41	\$ 30.02	\$ 90.96	\$ 60.94
Aug-21	124,969	136,465,616	\$ 11,728,706.64	\$ 0.086	\$ 0.029	\$ 3,940,613.93	\$ 0.057	\$ 7,788,092.71	\$ 31.53	\$ 93.85	\$ 62.32
Sep-21	123,850	134,467,823	\$ 11,590,741.02	\$ 0.086	\$ 0.032	\$ 4,266,278.70	\$ 0.054	\$ 7,324,462.32	\$ 34.45	\$ 93.59	\$ 59.14
Oct-21	122,850	100,395,707	\$ 8,872,925.94	\$ 0.088	\$ 0.034	\$ 3,404,371.78	\$ 0.054	\$ 5,468,554.16	\$ 27.71	\$ 72.23	\$ 44.51
Nov-21	121,586	92,198,096	\$ 8,318,239.97	\$ 0.090	\$ 0.036	\$ 3,296,209.68	\$ 0.054	\$ 5,022,030.29	\$ 27.11	\$ 68.41	\$ 41.30
Dec-21	119,738	117,110,665	\$ 10,792,207.13	\$ 0.092	\$ 0.035	\$ 4,119,241.44	\$ 0.057	\$ 6,672,965.69	\$ 34.40	\$ 90.13	\$ 55.73
2021			\$ 125,382,640.01			\$ 44,685,828.57		\$ 80,696,811.44	\$ 352.32	\$ 987.43	\$ 635.11
TOTAL			\$ 593,452,583.14			\$ 154,784,603.52		\$ 438,667,979.62	\$ 1,091.79	\$ 4,084.79	\$ 2,993.01

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-1, Attach. A-C REVISED; CAUSE-PA to FE I-4, Attachment A (PTC)

**Confirmed Low Income (Non-CAP) Customer Shopping
December, 2021**

	Shopping Customer Count	Shopping Usage (kWh)	Shopping Billed	Avg \$/kWh	Average Over Default Service Per kWh	Total Over Default	Default Service Price	Per Customer Over Default Service Price
MetEd	7,029	7,024,687	\$ 849,484	\$ 0.1209	\$ 0.0468	\$ 328,673.71	\$ 0.07414	\$ 46.76
Penelec	7,684	6,097,321	\$ 766,213	\$ 0.1257	\$ 0.0606	\$ 369,460.32	\$ 0.06507	\$ 48.08
Penn Power	1,669	1,508,919	\$ 191,625	\$ 0.1270	\$ 0.0511	\$ 77,052.78	\$ 0.07593	\$ 46.17
West Penn Power	6,163	6,415,741	\$ 739,710	\$ 0.1153	\$ 0.0583	\$ 374,141.08	\$ 0.05698	\$ 60.71
TOTAL	22,545	21,046,668	\$ 2,547,032			\$ 1,149,327.89		

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-7, Attachment A

**Includes shopping data for confirmed low income customers not enrolled in PCAP.

***Due to the manner in which CLI customers are tracked, FirstEnergy could only provide point-in-time data as of the last day of the year.

CAP SHOPPING - SUMMARY, ALL SERVICE TERRITORIES

July 2017-December 2021

Total CAP Shopping Charges in Excess of Default Service Price					
	MetEd	Penelec	Penn Power	West Penn Power	Average Over Default Across All Companies
Jul-Dec 2017	\$ 349,847.18	\$ 400,167.62	\$ 92,056.55	\$ 553,412.80	\$1,395,484.15
2018	\$ 726,690.10	\$ 728,971.07	\$ 138,226.95	\$ 1,176,852.98	\$2,770,741.10
2019	\$ 467,384.84	\$ 567,405.98	\$ 116,821.77	\$ 630,089.80	\$1,781,702.39
2020	\$ 420,313.42	\$ 391,000.02	\$ 99,943.27	\$ 520,727.80	\$1,431,984.51
2021	\$ 454,575.75	\$ 527,783.93	\$ 115,008.46	\$ 674,572.53	\$1,771,940.67
TOTAL	\$ 2,418,811.29	\$ 2,615,328.62	\$ 562,057.00	\$ 3,555,655.91	\$9,151,852.82

Average Per-Customer CAP Shopping Charges in Excess of Default Service Price				
	MetEd	Penelec	Penn Power	West Penn Power
Jul-Dec 2017	\$ 77.51	\$ 72.67	\$ 84.11	\$ 72.13
2018	\$ 184.35	\$ 150.61	\$ 143.17	\$ 202.54
2019	\$ 196.98	\$ 176.87	\$ 191.76	\$ 214.84
2020	\$ 247.76	\$ 175.07	\$ 229.01	\$ 259.17
2021	\$ 274.20	\$ 248.52	\$ 281.68	\$ 367.18
TOTAL	\$ 980.80	\$ 823.74	\$ 929.73	\$ 1,115.86

CAP Shopping Charges in Excess of Default Service Price since <u>June 2019</u>, when CAP Shopping Rules were Implemented		
	Total Charges in Excess of Default Service	Avg. Charges Per CAP Customer in Excess of Default
MetEd	\$1,107,860.30	\$651.38
Penelec	\$1,147,910.33	\$520.62
Penn Power	\$278,010.85	\$640.92
West Penn	\$1,488,526.93	\$761.39
TOTAL	\$4,022,308.41	

*The data in this Exhibit was derived from data in CAUSE-PA to FE I-10, Attachment B; CAUSE-PA to FE I-4, Attachment A (PTC)

CAP SHOPPING - MetEd
July 2017-December 2021

Date	CAP Shopping Customer Count	CAP Shopping Usage (kWh)	CAP Shopping Billed	Avg \$/kWh - CAP Shopping	Avg \$/kWh Over Default Rate	Total Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Jul-17	4,694	4,414,950	\$ 326,238.38	\$ 0.0739	\$ 0.0137	\$ 60,546.69	\$ 0.0602	\$ 265,691.69	\$ 12.90	\$ 69.50	\$ 56.60
Aug-17	4,578	4,494,626	\$ 333,735.24	\$ 0.0743	\$ 0.0141	\$ 63,248.65	\$ 0.0602	\$ 270,486.59	\$ 13.82	\$ 72.90	\$ 59.08
Sep-17	4,551	3,715,391	\$ 281,054.47	\$ 0.0756	\$ 0.0157	\$ 58,316.78	\$ 0.0600	\$ 222,737.69	\$ 12.81	\$ 61.76	\$ 48.94
Oct-17	4,531	3,487,985	\$ 266,581.08	\$ 0.0764	\$ 0.0165	\$ 57,476.38	\$ 0.0600	\$ 209,104.70	\$ 12.69	\$ 58.83	\$ 46.15
Nov-17	4,440	3,509,744	\$ 273,794.30	\$ 0.0780	\$ 0.0181	\$ 63,385.15	\$ 0.0600	\$ 210,409.15	\$ 14.28	\$ 61.67	\$ 47.39
Dec-17	4,252	4,868,278	\$ 378,695.37	\$ 0.0778	\$ 0.0096	\$ 46,873.54	\$ 0.0682	\$ 331,821.83	\$ 11.02	\$ 89.06	\$ 78.04
2017			\$ 1,860,098.84			\$ 349,847.18		\$ 1,510,251.66	\$ 77.51	\$ 413.72	\$ 336.21
18-Jan	4,240	6,661,835	\$ 511,530.77	\$ 0.0768	\$ 0.0086	\$ 57,460.10	\$ 0.0682	\$ 454,070.67	\$ 13.55	\$ 120.64	\$ 107.09
Feb-18	4,177	5,648,566	\$ 435,961.32	\$ 0.0772	\$ 0.0090	\$ 50,955.06	\$ 0.0682	\$ 385,006.26	\$ 12.20	\$ 104.37	\$ 92.17
Mar-18	3,965	4,394,908	\$ 357,267.90	\$ 0.0813	\$ 0.0195	\$ 85,618.64	\$ 0.0618	\$ 271,649.26	\$ 21.59	\$ 90.11	\$ 68.51
Apr-18	4,108	4,461,923	\$ 351,139.82	\$ 0.0787	\$ 0.0169	\$ 75,348.36	\$ 0.0618	\$ 275,791.46	\$ 18.34	\$ 85.48	\$ 67.14
May-18	4,103	3,402,086	\$ 272,297.77	\$ 0.0800	\$ 0.0182	\$ 62,014.83	\$ 0.0618	\$ 210,282.94	\$ 15.11	\$ 66.37	\$ 51.25
Jun-18	3,991	3,132,001	\$ 251,394.59	\$ 0.0803	\$ 0.0169	\$ 52,794.41	\$ 0.0634	\$ 198,600.18	\$ 13.23	\$ 62.99	\$ 49.76
Jul-18	3,952	3,743,639	\$ 300,661.04	\$ 0.0803	\$ 0.0169	\$ 63,276.89	\$ 0.0634	\$ 237,384.15	\$ 16.01	\$ 76.08	\$ 60.07
Aug-18	3,910	3,925,431	\$ 308,998.92	\$ 0.0787	\$ 0.0153	\$ 60,087.34	\$ 0.0634	\$ 248,911.58	\$ 15.37	\$ 79.03	\$ 63.66
Sep-18	3,783	3,690,199	\$ 297,059.17	\$ 0.0805	\$ 0.0198	\$ 73,137.89	\$ 0.0607	\$ 223,921.28	\$ 19.33	\$ 78.52	\$ 59.19
Oct-18	3,734	2,836,733	\$ 224,976.55	\$ 0.0793	\$ 0.0186	\$ 52,843.59	\$ 0.0607	\$ 172,132.96	\$ 14.15	\$ 60.25	\$ 46.10
Nov-18	3,688	3,174,084	\$ 242,052.59	\$ 0.0763	\$ 0.0156	\$ 49,449.17	\$ 0.0607	\$ 192,603.42	\$ 13.41	\$ 65.63	\$ 52.22
Dec-18	3,627	4,522,322	\$ 345,975.82	\$ 0.0765	\$ 0.0097	\$ 43,703.82	\$ 0.0668	\$ 302,272.00	\$ 12.05	\$ 95.39	\$ 83.34
2018			\$ 3,899,316.26			\$ 726,690.10		\$ 3,172,626.16	\$ 184.35	\$ 984.86	\$ 800.51
Jan-19	3,609	5,102,085	\$ 376,878.62	\$ 0.0739	\$ 0.0070	\$ 35,855.26	\$ 0.0668	\$ 341,023.36	\$ 9.93	\$ 104.43	\$ 94.49
Feb-19	3,491	4,927,667	\$ 383,428.21	\$ 0.0778	\$ 0.0110	\$ 54,062.95	\$ 0.0668	\$ 329,365.26	\$ 15.49	\$ 109.83	\$ 94.35
Mar-19	3,518	4,569,189	\$ 347,884.11	\$ 0.0761	\$ 0.0137	\$ 62,721.02	\$ 0.0624	\$ 285,163.09	\$ 17.83	\$ 98.89	\$ 81.06
Apr-19	3,409	3,382,977	\$ 265,023.20	\$ 0.0783	\$ 0.0159	\$ 53,891.61	\$ 0.0624	\$ 211,131.59	\$ 15.81	\$ 77.74	\$ 61.93
May-19	3,277	2,674,434	\$ 194,794.30	\$ 0.0728	\$ 0.0104	\$ 27,882.87	\$ 0.0624	\$ 166,911.43	\$ 8.51	\$ 59.44	\$ 50.93
Jun-19	2,328	1,726,170	\$ 128,954.41	\$ 0.0747	\$ 0.0193	\$ 33,324.59	\$ 0.0554	\$ 95,629.82	\$ 14.31	\$ 55.39	\$ 41.08
Jul-19	2,016	1,882,630	\$ 148,078.66	\$ 0.0787	\$ 0.0233	\$ 43,780.96	\$ 0.0554	\$ 104,297.70	\$ 21.72	\$ 73.45	\$ 51.73
Aug-19	1,869	2,044,633	\$ 157,311.36	\$ 0.0769	\$ 0.0215	\$ 44,038.69	\$ 0.0554	\$ 113,272.67	\$ 23.56	\$ 84.17	\$ 60.61
Sep-19	1,687	1,515,085	\$ 123,083.21	\$ 0.0812	\$ 0.0246	\$ 37,223.34	\$ 0.0567	\$ 85,859.87	\$ 22.06	\$ 72.96	\$ 50.90
Oct-19	1,639	1,211,773	\$ 95,964.18	\$ 0.0792	\$ 0.0225	\$ 27,293.00	\$ 0.0567	\$ 68,671.18	\$ 16.65	\$ 58.55	\$ 41.90
Nov-19	1,551	1,270,141	\$ 98,858.29	\$ 0.0778	\$ 0.0212	\$ 26,879.40	\$ 0.0567	\$ 71,978.89	\$ 17.33	\$ 63.74	\$ 46.41
Dec-19	1,484	1,752,540	\$ 134,521.50	\$ 0.0768	\$ 0.0117	\$ 20,431.15	\$ 0.0651	\$ 114,090.35	\$ 13.77	\$ 90.65	\$ 76.88
2019			\$ 2,454,780.05			\$ 467,384.84		\$ 1,987,395.21	\$ 196.98	\$ 949.24	\$ 752.27

Jan-20	1,506	1,985,933	\$ 150,918.16	\$ 0.0760	\$ 0.0109	\$ 21,633.92	\$ 0.0651	\$ 129,284.24	\$ 14.37	\$ 100.21	\$ 85.85
Feb-20	1,521	1,929,089	\$ 147,373.50	\$ 0.0764	\$ 0.0113	\$ 21,789.81	\$ 0.0651	\$ 125,583.69	\$ 14.33	\$ 96.89	\$ 82.57
Mar-20	1,533	1,814,292	\$ 139,594.42	\$ 0.0769	\$ 0.0230	\$ 41,804.08	\$ 0.0539	\$ 97,790.34	\$ 27.27	\$ 91.06	\$ 63.79
Apr-20	1,608	1,596,885	\$ 121,285.12	\$ 0.0760	\$ 0.0221	\$ 35,213.02	\$ 0.0539	\$ 86,072.10	\$ 21.90	\$ 75.43	\$ 53.53
May-20	1,672	1,528,450	\$ 117,372.64	\$ 0.0768	\$ 0.0229	\$ 34,989.18	\$ 0.0539	\$ 82,383.46	\$ 20.93	\$ 70.20	\$ 49.27
Jun-20	1,758	1,492,847	\$ 116,530.38	\$ 0.0781	\$ 0.0244	\$ 36,498.85	\$ 0.0536	\$ 80,031.53	\$ 20.76	\$ 66.29	\$ 45.52
Jul-20	1,784	1,848,168	\$ 139,529.35	\$ 0.0755	\$ 0.0219	\$ 40,449.06	\$ 0.0536	\$ 99,080.29	\$ 22.67	\$ 78.21	\$ 55.54
Aug-20	1,725	2,056,803	\$ 160,731.09	\$ 0.0781	\$ 0.0245	\$ 50,465.88	\$ 0.0536	\$ 110,265.21	\$ 29.26	\$ 93.18	\$ 63.92
Sep-20	1,735	1,811,867	\$ 143,088.15	\$ 0.0790	\$ 0.0214	\$ 38,778.97	\$ 0.0576	\$ 104,309.18	\$ 22.35	\$ 82.47	\$ 60.12
Oct-20	1,831	1,380,698	\$ 110,919.26	\$ 0.0803	\$ 0.0228	\$ 31,432.48	\$ 0.0576	\$ 79,486.78	\$ 17.17	\$ 60.58	\$ 43.41
Nov-20	1,836	1,478,514	\$ 116,901.69	\$ 0.0791	\$ 0.0215	\$ 31,783.64	\$ 0.0576	\$ 85,118.05	\$ 17.31	\$ 63.67	\$ 46.36
Dec-20	1,823	1,926,979	\$ 154,446.21	\$ 0.0801	\$ 0.0184	\$ 35,474.53	\$ 0.0617	\$ 118,971.68	\$ 19.46	\$ 84.72	\$ 65.26
2020			\$ 1,618,689.97			\$ 420,313.42		\$ 1,198,376.55	\$ 247.76	\$ 962.91	\$ 715.14
Jan-21	1,836	2,546,707	\$ 200,518.05	\$ 0.0787	\$ 0.0170	\$ 43,284.36	\$ 0.0617	\$ 157,233.69	\$ 23.58	\$ 109.21	\$ 85.64
Feb-21	1,828	2,475,167	\$ 194,670.54	\$ 0.0786	\$ 0.0169	\$ 41,853.73	\$ 0.0617	\$ 152,816.81	\$ 22.90	\$ 106.49	\$ 83.60
Mar-21	1,821	2,440,889	\$ 195,209.11	\$ 0.0800	\$ 0.0258	\$ 62,961.74	\$ 0.0542	\$ 132,247.37	\$ 34.58	\$ 107.20	\$ 72.62
Apr-21	1,764	1,785,028	\$ 148,728.86	\$ 0.0833	\$ 0.0291	\$ 52,016.04	\$ 0.0542	\$ 96,712.82	\$ 29.49	\$ 84.31	\$ 54.83
May-21	1,667	1,343,665	\$ 114,898.16	\$ 0.0855	\$ 0.0313	\$ 42,098.39	\$ 0.0542	\$ 72,799.77	\$ 25.25	\$ 68.93	\$ 43.67
Jun-21	1,594	1,333,184	\$ 116,134.04	\$ 0.0871	\$ 0.0202	\$ 26,944.03	\$ 0.0669	\$ 89,190.01	\$ 16.90	\$ 72.86	\$ 55.95
Jul-21	1,560	1,609,458	\$ 141,532.06	\$ 0.0879	\$ 0.0210	\$ 33,859.32	\$ 0.0669	\$ 107,672.74	\$ 21.70	\$ 90.73	\$ 69.02
Aug-21	1,531	1,679,756	\$ 144,832.35	\$ 0.0862	\$ 0.0193	\$ 32,456.67	\$ 0.0669	\$ 112,375.68	\$ 21.20	\$ 94.60	\$ 73.40
Sep-21	1,451	1,567,665	\$ 140,139.25	\$ 0.0894	\$ 0.0183	\$ 28,615.56	\$ 0.0711	\$ 111,523.69	\$ 19.72	\$ 96.58	\$ 76.86
Oct-21	1,509	1,179,560	\$ 107,802.38	\$ 0.0914	\$ 0.0203	\$ 23,888.48	\$ 0.0711	\$ 83,913.90	\$ 15.83	\$ 71.44	\$ 55.61
Nov-21	1,530	1,198,557	\$ 113,141.21	\$ 0.0944	\$ 0.0233	\$ 27,875.87	\$ 0.0711	\$ 85,265.34	\$ 18.22	\$ 73.95	\$ 55.73
Dec-21	1,559	1,736,734	\$ 167,483.01	\$ 0.0964	\$ 0.0223	\$ 38,721.55	\$ 0.0741	\$ 128,761.46	\$ 24.84	\$ 107.43	\$ 82.59
2021			\$ 1,785,089.02			\$ 454,575.75		\$ 1,330,513.27	\$ 274.20	\$ 1,083.73	\$ 809.52
TOTAL			\$ 11,617,974.14			\$ 2,418,811.30		\$ 9,199,162.84	\$ 980.81	\$ 4,394.45	\$ 3,413.64
TOTAL OVER DEFAULT June 2019-December 2021, Since Impementation of CAP Shopping Restrictions								\$ 1,107,860.30			
TOTAL Avg. Charges PER CUSTOMER Since Implementation of CAP Shopping Restrictions								\$ 651.38			

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-10, Attachment B; CAUSE-PA to FE I-4, Attachment A (PTC)

CAP SHOPPING - Penelec

July 2017-December 2021

Date	CAP Shopping Customer Count	CAP Shopping Usage (kWh)	CAP Shopping Billed	Avg \$/kWh - CAP Shopping	Avg \$/kWh Over Default Rate	Total Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Jul-17	5,755	3,878,221	\$ 294,441.64	\$ 0.0759	\$ 0.0143	\$ 55,620.79	\$ 0.0616	\$ 238,820.85	\$ 9.66	\$ 51.16	\$ 41.50
Aug-17	5,685	3,966,078	\$ 299,676.32	\$ 0.0756	\$ 0.0140	\$ 55,445.24	\$ 0.0616	\$ 244,231.08	\$ 9.75	\$ 52.71	\$ 42.96
Sep-17	5,572	3,463,964	\$ 265,247.30	\$ 0.0766	\$ 0.0227	\$ 78,782.12	\$ 0.0538	\$ 186,465.18	\$ 14.14	\$ 47.60	\$ 33.46
Oct-17	5,445	3,266,591	\$ 256,661.51	\$ 0.0786	\$ 0.0247	\$ 80,820.92	\$ 0.0538	\$ 175,840.59	\$ 14.84	\$ 47.14	\$ 32.29
Nov-17	5,398	3,682,854	\$ 285,392.38	\$ 0.0775	\$ 0.0237	\$ 87,144.35	\$ 0.0538	\$ 198,248.03	\$ 16.14	\$ 52.87	\$ 36.73
Dec-17	5,210	4,530,125	\$ 347,775.24	\$ 0.0768	\$ 0.0093	\$ 42,354.21	\$ 0.0674	\$ 305,421.03	\$ 8.13	\$ 66.75	\$ 58.62
2017			\$ 1,749,194.39			\$ 400,167.62		\$ 1,349,026.77	\$ 72.67	\$ 318.24	\$ 245.57
Jan-18	5,192	5,842,929	\$ 450,214.67	\$ 0.0771	\$ 0.0096	\$ 56,284.40	\$ 0.0674	\$ 393,930.27	\$ 10.84	\$ 86.71	\$ 75.87
Feb-18	5,170	5,032,062	\$ 390,243.23	\$ 0.0776	\$ 0.0101	\$ 50,981.61	\$ 0.0674	\$ 339,261.62	\$ 9.86	\$ 75.48	\$ 65.62
Mar-18	4,962	4,231,893	\$ 339,487.19	\$ 0.0802	\$ 0.0214	\$ 90,736.52	\$ 0.0588	\$ 248,750.67	\$ 18.29	\$ 68.42	\$ 50.13
Apr-18	5,179	4,398,734	\$ 331,686.33	\$ 0.0754	\$ 0.0166	\$ 73,128.75	\$ 0.0588	\$ 258,557.58	\$ 14.12	\$ 64.04	\$ 49.92
May-18	5,110	3,301,405	\$ 254,463.77	\$ 0.0771	\$ 0.0183	\$ 60,407.18	\$ 0.0588	\$ 194,056.59	\$ 11.82	\$ 49.80	\$ 37.98
Jun-18	4,977	3,091,675	\$ 242,842.36	\$ 0.0785	\$ 0.0163	\$ 50,447.42	\$ 0.0622	\$ 192,394.94	\$ 10.14	\$ 48.79	\$ 38.66
Jul-18	4,685	3,272,704	\$ 256,792.11	\$ 0.0785	\$ 0.0162	\$ 53,131.74	\$ 0.0622	\$ 203,660.37	\$ 11.34	\$ 54.81	\$ 43.47
Aug-18	4,733	3,381,877	\$ 264,971.66	\$ 0.0784	\$ 0.0161	\$ 54,517.45	\$ 0.0622	\$ 210,454.21	\$ 11.52	\$ 55.98	\$ 44.47
Sep-18	4,610	3,336,615	\$ 264,392.12	\$ 0.0792	\$ 0.0196	\$ 65,262.94	\$ 0.0597	\$ 199,129.18	\$ 14.16	\$ 57.35	\$ 43.20
Oct-18	4,546	2,770,717	\$ 218,613.43	\$ 0.0789	\$ 0.0192	\$ 53,257.04	\$ 0.0597	\$ 165,356.39	\$ 11.72	\$ 48.09	\$ 36.37
Nov-18	4,500	3,258,155	\$ 253,109.04	\$ 0.0777	\$ 0.0180	\$ 58,662.35	\$ 0.0597	\$ 194,446.69	\$ 13.04	\$ 56.25	\$ 43.21
Dec-18	4,511	4,150,882	\$ 323,161.13	\$ 0.0779	\$ 0.0150	\$ 62,153.67	\$ 0.0629	\$ 261,007.46	\$ 13.78	\$ 71.64	\$ 57.86
2018			\$ 3,589,977.04			\$ 728,971.07		\$ 2,861,005.97	\$ 150.61	\$ 737.37	\$ 586.76
Jan-19	4,415	4,248,311	\$ 329,642.17	\$ 0.0776	\$ 0.0147	\$ 62,508.37	\$ 0.0629	\$ 267,133.80	\$ 14.16	\$ 74.66	\$ 60.51
Feb-19	4,268	4,196,424	\$ 338,459.47	\$ 0.0807	\$ 0.0178	\$ 74,588.33	\$ 0.0629	\$ 263,871.14	\$ 17.48	\$ 79.30	\$ 61.83
Mar-19	4,286	3,915,548	\$ 306,495.83	\$ 0.0783	\$ 0.0208	\$ 81,469.29	\$ 0.0575	\$ 225,026.54	\$ 19.01	\$ 71.51	\$ 52.50
Apr-19	4,189	3,168,446	\$ 252,465.09	\$ 0.0797	\$ 0.0222	\$ 70,374.50	\$ 0.0575	\$ 182,090.59	\$ 16.80	\$ 60.27	\$ 43.47
May-19	3,977	2,593,144	\$ 198,322.10	\$ 0.0765	\$ 0.0190	\$ 49,294.11	\$ 0.0575	\$ 149,027.99	\$ 12.39	\$ 49.87	\$ 37.47
Jun-19	3,026	1,689,862	\$ 128,692.67	\$ 0.0762	\$ 0.0195	\$ 32,911.29	\$ 0.0567	\$ 95,781.38	\$ 10.88	\$ 42.53	\$ 31.65
Jul-19	2,633	1,763,455	\$ 137,466.41	\$ 0.0780	\$ 0.0213	\$ 37,513.78	\$ 0.0567	\$ 99,952.63	\$ 14.25	\$ 52.21	\$ 37.96
Aug-19	2,502	1,905,149	\$ 143,669.17	\$ 0.0754	\$ 0.0187	\$ 35,685.32	\$ 0.0567	\$ 107,983.85	\$ 14.26	\$ 57.42	\$ 43.16
Sep-19	2,259	1,449,896	\$ 111,371.13	\$ 0.0768	\$ 0.0248	\$ 36,005.54	\$ 0.0520	\$ 75,365.59	\$ 15.94	\$ 49.30	\$ 33.36
Oct-19	2,167	1,305,120	\$ 98,864.34	\$ 0.0758	\$ 0.0238	\$ 31,024.20	\$ 0.0520	\$ 67,840.14	\$ 14.32	\$ 45.62	\$ 31.31
Nov-19	2,057	1,471,527	\$ 111,948.48	\$ 0.0761	\$ 0.0241	\$ 35,458.51	\$ 0.0520	\$ 76,489.97	\$ 17.24	\$ 54.42	\$ 37.19
Dec-19	2,027	1,789,213	\$ 135,887.51	\$ 0.0759	\$ 0.0115	\$ 20,572.73	\$ 0.0645	\$ 115,314.78	\$ 10.15	\$ 67.04	\$ 56.89
2019			\$ 2,293,284.37			\$ 567,405.98		\$ 1,725,878.39	\$ 176.87	\$ 704.16	\$ 527.29

Jan-20	2,046	1,926,359	\$ 145,187.28	\$ 0.0754	\$ 0.0109	\$ 21,033.44	\$ 0.0645	\$ 124,153.84	\$ 10.28	\$ 70.96	\$ 60.68	
Feb-20	2,045	1,879,719	\$ 142,862.84	\$ 0.0760	\$ 0.0116	\$ 21,714.95	\$ 0.0645	\$ 121,147.89	\$ 10.62	\$ 69.86	\$ 59.24	
Mar-20	2,063	1,832,822	\$ 138,408.90	\$ 0.0755	\$ 0.0215	\$ 39,363.20	\$ 0.0540	\$ 99,045.70	\$ 19.08	\$ 67.09	\$ 48.01	
Apr-20	2,151	1,622,014	\$ 122,246.28	\$ 0.0754	\$ 0.0213	\$ 34,592.64	\$ 0.0540	\$ 87,653.64	\$ 16.08	\$ 56.83	\$ 40.75	
May-20	2,193	1,563,367	\$ 117,272.77	\$ 0.0750	\$ 0.0210	\$ 32,788.42	\$ 0.0540	\$ 84,484.35	\$ 14.95	\$ 53.48	\$ 38.52	
Jun-20	2,277	1,440,987	\$ 109,556.49	\$ 0.0760	\$ 0.0207	\$ 29,841.09	\$ 0.0553	\$ 79,715.40	\$ 13.11	\$ 48.11	\$ 35.01	
Jul-20	2,349	1,727,822	\$ 126,720.40	\$ 0.0733	\$ 0.0180	\$ 31,137.29	\$ 0.0553	\$ 95,583.11	\$ 13.26	\$ 53.95	\$ 40.69	
Aug-20	2,257	1,852,564	\$ 140,761.32	\$ 0.0760	\$ 0.0207	\$ 38,277.48	\$ 0.0553	\$ 102,483.84	\$ 16.96	\$ 62.37	\$ 45.41	
Sep-20	2,271	1,642,250	\$ 125,205.92	\$ 0.0762	\$ 0.0203	\$ 33,272.76	\$ 0.0560	\$ 91,933.16	\$ 14.65	\$ 55.13	\$ 40.48	
Oct-20	2,383	1,425,261	\$ 110,504.74	\$ 0.0775	\$ 0.0216	\$ 30,718.63	\$ 0.0560	\$ 79,786.11	\$ 12.89	\$ 46.37	\$ 33.48	
Nov-20	2,316	1,535,221	\$ 120,596.02	\$ 0.0786	\$ 0.0226	\$ 34,654.35	\$ 0.0560	\$ 85,941.67	\$ 14.96	\$ 52.07	\$ 37.11	
Dec-20	2,392	1,988,420	\$ 156,289.53	\$ 0.0786	\$ 0.0219	\$ 43,605.77	\$ 0.0567	\$ 112,683.76	\$ 18.23	\$ 65.34	\$ 47.11	
2020			\$ 1,555,612.49			\$ 391,000.02		\$ 1,164,612.47	\$ 175.07	\$ 701.56	\$ 526.49	
Jan-21	2,423	2,535,347	\$ 196,070.46	\$ 0.0773	\$ 0.0207	\$ 52,392.35	\$ 0.0567	\$ 143,678.11	\$ 21.62	\$ 80.92	\$ 59.30	
Feb-21	2,369	2,347,759	\$ 183,193.74	\$ 0.0780	\$ 0.0214	\$ 50,146.24	\$ 0.0567	\$ 133,047.50	\$ 21.17	\$ 77.33	\$ 56.16	
Mar-21	2,346	2,263,538	\$ 176,180.79	\$ 0.0778	\$ 0.0280	\$ 63,433.96	\$ 0.0498	\$ 112,746.83	\$ 27.04	\$ 75.10	\$ 48.06	
Apr-21	2,232	1,635,223	\$ 136,022.25	\$ 0.0832	\$ 0.0334	\$ 54,571.79	\$ 0.0498	\$ 81,450.46	\$ 24.45	\$ 60.94	\$ 36.49	
May-21	2,154	1,391,724	\$ 117,994.82	\$ 0.0848	\$ 0.0350	\$ 48,673.05	\$ 0.0498	\$ 69,321.77	\$ 22.60	\$ 54.78	\$ 32.18	
Jun-21	2,102	1,367,408	\$ 118,517.32	\$ 0.0867	\$ 0.0221	\$ 30,155.42	\$ 0.0646	\$ 88,361.90	\$ 14.35	\$ 56.38	\$ 42.04	
Jul-21	2,051	1,564,302	\$ 136,732.81	\$ 0.0874	\$ 0.0228	\$ 35,647.61	\$ 0.0646	\$ 101,085.20	\$ 17.38	\$ 66.67	\$ 49.29	
Aug-21	2,013	1,578,110	\$ 136,019.51	\$ 0.0862	\$ 0.0216	\$ 34,042.04	\$ 0.0646	\$ 101,977.47	\$ 16.91	\$ 67.57	\$ 50.66	
Sep-21	1,832	1,437,738	\$ 129,748.04	\$ 0.0902	\$ 0.0226	\$ 32,542.57	\$ 0.0676	\$ 97,205.47	\$ 17.76	\$ 70.82	\$ 53.06	
Oct-21	1,883	1,126,752	\$ 107,516.78	\$ 0.0954	\$ 0.0278	\$ 31,337.08	\$ 0.0676	\$ 76,179.70	\$ 16.64	\$ 57.10	\$ 40.46	
Nov-21	1,947	1,313,206	\$ 127,885.59	\$ 0.0974	\$ 0.0298	\$ 39,099.73	\$ 0.0676	\$ 88,785.86	\$ 20.08	\$ 65.68	\$ 45.60	
Dec-21	1,953	1,661,339	\$ 163,800.42	\$ 0.0986	\$ 0.0335	\$ 55,697.09	\$ 0.0651	\$ 108,103.33	\$ 28.52	\$ 83.87	\$ 55.35	
2021			\$ 1,729,682.53			\$ 527,738.93		\$ 1,201,943.60	\$ 248.52	\$ 817.17	\$ 568.65	
TOTALS			\$ 10,917,750.82			\$ 2,615,283.62		\$ 8,302,467.20	\$ 823.74	\$ 3,278.49	\$ 2,454.75	
TOTAL OVER DEFAULT June 2019-December 2021, Since Impementation of CAP Shopping Restrictions								\$	1,147,910.33			
TOTAL Avg. Charges PER CUSTOMER Since Implementation of CAP Shopping Restrictions								\$	520.62			

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-10, Attachment B; CAUSE-PA to FE I-4, Attachment A (PTC)

CAP SHOPPING - Penn Power

July 2017-December 2021

Date	CAP Shopping Customer Count	CAP Shopping Usage (kWh)	CAP Shopping Billed	Avg \$/kWh - CAP Shopping	Avg \$/kWh Over Default Rate	Total Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Jul-17	1,139	905,199	\$ 72,624.20	\$ 0.0802	\$ 0.0128	\$ 11,604.74	\$ 0.0674	\$ 61,019.46	\$ 10.19	\$ 63.76	\$ 53.57
Aug-17	1,145	964,095	\$ 76,896.96	\$ 0.0798	\$ 0.0124	\$ 11,907.32	\$ 0.0674	\$ 64,989.64	\$ 10.40	\$ 67.16	\$ 56.76
Sep-17	1,128	816,277	\$ 66,635.17	\$ 0.0816	\$ 0.0221	\$ 18,017.71	\$ 0.0596	\$ 48,617.46	\$ 15.97	\$ 59.07	\$ 43.10
Oct-17	1,093	779,406	\$ 65,318.38	\$ 0.0838	\$ 0.0242	\$ 18,896.96	\$ 0.0596	\$ 46,421.42	\$ 17.29	\$ 59.76	\$ 42.47
Nov-17	1,065	810,235	\$ 67,343.43	\$ 0.0831	\$ 0.0236	\$ 19,085.83	\$ 0.0596	\$ 48,257.60	\$ 17.92	\$ 63.23	\$ 45.31
Dec-17	1,017	1,116,040	\$ 92,921.20	\$ 0.0833	\$ 0.0112	\$ 12,544.00	\$ 0.0720	\$ 80,377.20	\$ 12.33	\$ 91.37	\$ 79.03
2017			\$ 441,739.34			\$ 92,056.55		\$ 349,682.79	\$ 84.11	\$ 404.36	\$ 320.25
18-Jan	1,022	1,442,617	\$ 117,441.85	\$ 0.0814	\$ 0.0094	\$ 13,544.57	\$ 0.0720	\$ 103,897.28	\$ 13.25	\$ 114.91	\$ 101.66
Feb-18	1,017	1,267,568	\$ 102,233.22	\$ 0.0807	\$ 0.0086	\$ 10,942.97	\$ 0.0720	\$ 91,290.25	\$ 10.76	\$ 100.52	\$ 89.76
Mar-18	967	981,308	\$ 84,070.12	\$ 0.0857	\$ 0.0197	\$ 19,313.61	\$ 0.0660	\$ 64,756.51	\$ 19.97	\$ 86.94	\$ 66.97
Apr-18	978	966,538	\$ 79,671.74	\$ 0.0824	\$ 0.0164	\$ 15,889.90	\$ 0.0660	\$ 63,781.84	\$ 16.25	\$ 81.46	\$ 65.22
May-18	985	750,955	\$ 62,983.39	\$ 0.0839	\$ 0.0179	\$ 13,427.87	\$ 0.0660	\$ 49,555.52	\$ 13.63	\$ 63.94	\$ 50.31
Jun-18	973	719,814	\$ 59,176.55	\$ 0.0822	\$ 0.0140	\$ 10,056.44	\$ 0.0682	\$ 49,120.11	\$ 10.34	\$ 60.82	\$ 50.48
Jul-18	938	755,076	\$ 61,025.93	\$ 0.0808	\$ 0.0126	\$ 9,499.54	\$ 0.0682	\$ 51,526.39	\$ 10.13	\$ 65.06	\$ 54.93
Aug-18	927	829,771	\$ 66,930.03	\$ 0.0807	\$ 0.0124	\$ 10,306.46	\$ 0.0682	\$ 56,623.57	\$ 11.12	\$ 72.20	\$ 61.08
Sep-18	926	815,382	\$ 64,678.75	\$ 0.0793	\$ 0.0131	\$ 10,651.54	\$ 0.0663	\$ 54,027.21	\$ 11.50	\$ 69.85	\$ 58.34
Oct-18	933	711,743	\$ 55,513.11	\$ 0.0780	\$ 0.0117	\$ 8,353.02	\$ 0.0663	\$ 47,160.09	\$ 8.95	\$ 59.50	\$ 50.55
Nov-18	943	786,301	\$ 63,070.84	\$ 0.0802	\$ 0.0140	\$ 10,970.54	\$ 0.0663	\$ 52,100.30	\$ 11.63	\$ 66.88	\$ 55.25
Dec-18	935	1,071,889	\$ 87,956.01	\$ 0.0821	\$ 0.0049	\$ 5,270.49	\$ 0.0771	\$ 82,685.52	\$ 5.64	\$ 94.07	\$ 88.43
2018			\$ 904,751.54			\$ 138,226.95		\$ 766,524.59	\$ 143.17	\$ 936.16	\$ 792.99
Jan-19	921	1,096,163	\$ 85,146.02	\$ 0.0777	\$ 0.0005	\$ 588.01	\$ 0.0771	\$ 84,558.01	\$ 0.64	\$ 92.45	\$ 91.81
Feb-19	903	1,178,553	\$ 96,382.85	\$ 0.0818	\$ 0.0046	\$ 5,469.27	\$ 0.0771	\$ 90,913.58	\$ 6.06	\$ 106.74	\$ 100.68
Mar-19	893	981,227	\$ 83,165.64	\$ 0.0848	\$ 0.0206	\$ 20,229.74	\$ 0.0641	\$ 62,935.90	\$ 22.65	\$ 93.13	\$ 70.48
Apr-19	871	780,471	\$ 66,549.76	\$ 0.0853	\$ 0.0211	\$ 16,490.35	\$ 0.0641	\$ 50,059.41	\$ 18.93	\$ 76.41	\$ 57.47
May-19	829	627,914	\$ 51,259.67	\$ 0.0816	\$ 0.0175	\$ 10,985.27	\$ 0.0641	\$ 40,274.40	\$ 13.25	\$ 61.83	\$ 48.58
Jun-19	631	408,393	\$ 35,275.38	\$ 0.0864	\$ 0.0238	\$ 9,726.31	\$ 0.0626	\$ 25,549.07	\$ 15.41	\$ 55.90	\$ 40.49
Jul-19	541	427,733	\$ 37,314.90	\$ 0.0872	\$ 0.0247	\$ 10,555.92	\$ 0.0626	\$ 26,758.98	\$ 19.51	\$ 68.97	\$ 49.46
Aug-19	505	469,663	\$ 39,466.25	\$ 0.0840	\$ 0.0215	\$ 10,084.13	\$ 0.0626	\$ 29,382.12	\$ 19.97	\$ 78.15	\$ 58.18
Sep-19	448	354,934	\$ 30,625.82	\$ 0.0863	\$ 0.0240	\$ 8,509.88	\$ 0.0623	\$ 22,115.94	\$ 19.00	\$ 68.36	\$ 49.37
Oct-19	438	307,535	\$ 27,780.31	\$ 0.0903	\$ 0.0280	\$ 8,617.80	\$ 0.0623	\$ 19,162.51	\$ 19.68	\$ 63.43	\$ 43.75
Nov-19	432	341,255	\$ 30,875.23	\$ 0.0905	\$ 0.0282	\$ 9,611.63	\$ 0.0623	\$ 21,263.60	\$ 22.25	\$ 71.47	\$ 49.22
Dec-19	413	463,286	\$ 41,033.46	\$ 0.0886	\$ 0.0129	\$ 5,953.44	\$ 0.0757	\$ 35,080.02	\$ 14.42	\$ 99.35	\$ 84.94
2019			\$ 624,875.29			\$ 116,821.77		\$ 508,053.52	\$ 191.76	\$ 936.20	\$ 744.43

Jan-20	409	499,519	\$ 43,870.67	\$ 0.0878	\$ 0.0121	\$ 6,047.09	\$ 0.0757	\$ 37,823.58	\$ 14.79	\$ 107.26	\$ 92.48	
Feb-20	398	457,119	\$ 39,058.75	\$ 0.0854	\$ 0.0097	\$ 4,445.70	\$ 0.0757	\$ 34,613.05	\$ 11.17	\$ 98.14	\$ 86.97	
Mar-20	408	461,748	\$ 39,176.60	\$ 0.0848	\$ 0.0222	\$ 10,238.85	\$ 0.0627	\$ 28,937.75	\$ 25.10	\$ 96.02	\$ 70.93	
Apr-20	431	429,162	\$ 35,427.48	\$ 0.0826	\$ 0.0199	\$ 8,531.90	\$ 0.0627	\$ 26,895.58	\$ 19.80	\$ 82.20	\$ 62.40	
May-20	427	399,428	\$ 33,542.73	\$ 0.0840	\$ 0.0213	\$ 8,510.58	\$ 0.0627	\$ 25,032.15	\$ 19.93	\$ 78.55	\$ 58.62	
Jun-20	459	375,375	\$ 32,070.78	\$ 0.0854	\$ 0.0186	\$ 6,980.72	\$ 0.0668	\$ 25,090.07	\$ 15.21	\$ 69.87	\$ 54.66	
Jul-20	456	411,761	\$ 35,913.33	\$ 0.0872	\$ 0.0204	\$ 8,391.22	\$ 0.0668	\$ 27,522.11	\$ 18.40	\$ 78.76	\$ 60.36	
Aug-20	451	492,678	\$ 42,292.03	\$ 0.0858	\$ 0.0190	\$ 9,361.43	\$ 0.0668	\$ 32,930.60	\$ 20.76	\$ 93.77	\$ 73.02	
Sep-20	447	432,022	\$ 38,002.39	\$ 0.0880	\$ 0.0235	\$ 10,149.93	\$ 0.0645	\$ 27,852.46	\$ 22.71	\$ 85.02	\$ 62.31	
Oct-20	453	369,218	\$ 32,331.44	\$ 0.0876	\$ 0.0231	\$ 8,527.96	\$ 0.0645	\$ 23,803.48	\$ 18.83	\$ 71.37	\$ 52.55	
Nov-20	447	365,597	\$ 31,851.87	\$ 0.0871	\$ 0.0227	\$ 8,281.83	\$ 0.0645	\$ 23,570.04	\$ 18.53	\$ 71.26	\$ 52.73	
Dec-20	440	442,481	\$ 38,949.71	\$ 0.0880	\$ 0.0237	\$ 10,476.06	\$ 0.0644	\$ 28,473.65	\$ 23.81	\$ 88.52	\$ 64.71	
2020			\$ 442,487.78			\$ 99,943.27		\$ 342,544.51	\$ 229.01	\$ 1,020.74	\$ 791.73	
Jan-21	451	581,212	\$ 49,699.94	\$ 0.0855	\$ 0.0212	\$ 12,298.95	\$ 0.0644	\$ 37,400.99	\$ 27.27	\$ 110.20	\$ 82.93	
Feb-21	452	589,702	\$ 50,323.96	\$ 0.0853	\$ 0.0210	\$ 12,376.64	\$ 0.0644	\$ 37,947.32	\$ 27.38	\$ 111.34	\$ 83.95	
Mar-21	439	545,242	\$ 46,942.88	\$ 0.0861	\$ 0.0289	\$ 15,749.59	\$ 0.0572	\$ 31,193.29	\$ 35.88	\$ 106.93	\$ 71.06	
Apr-21	437	393,033	\$ 35,088.39	\$ 0.0893	\$ 0.0321	\$ 12,602.97	\$ 0.0572	\$ 22,485.42	\$ 28.84	\$ 80.29	\$ 51.45	
May-21	420	340,088	\$ 31,773.60	\$ 0.0934	\$ 0.0362	\$ 12,317.17	\$ 0.0572	\$ 19,456.43	\$ 29.33	\$ 75.65	\$ 46.32	
Jun-21	407	322,105	\$ 30,300.69	\$ 0.0941	\$ 0.0221	\$ 7,125.24	\$ 0.0720	\$ 23,175.45	\$ 17.51	\$ 74.45	\$ 56.94	
Jul-21	380	333,082	\$ 31,918.97	\$ 0.0958	\$ 0.0239	\$ 7,953.72	\$ 0.0720	\$ 23,965.25	\$ 20.93	\$ 84.00	\$ 63.07	
Aug-21	367	337,409	\$ 31,710.62	\$ 0.0940	\$ 0.0220	\$ 7,434.04	\$ 0.0720	\$ 24,276.58	\$ 20.26	\$ 86.40	\$ 66.15	
Sep-21	345	301,063	\$ 29,572.96	\$ 0.0982	\$ 0.0217	\$ 6,520.57	\$ 0.0766	\$ 23,052.39	\$ 18.90	\$ 85.72	\$ 66.82	
Oct-21	356	258,371	\$ 25,765.93	\$ 0.0997	\$ 0.0232	\$ 5,982.46	\$ 0.0766	\$ 19,783.47	\$ 16.80	\$ 72.38	\$ 55.57	
Nov-21	379	276,408	\$ 27,167.48	\$ 0.0983	\$ 0.0217	\$ 6,002.92	\$ 0.0766	\$ 21,164.56	\$ 15.84	\$ 71.68	\$ 55.84	
Dec-21	380	374,190	\$ 37,056.45	\$ 0.0990	\$ 0.0231	\$ 8,644.20	\$ 0.0759	\$ 28,412.25	\$ 22.75	\$ 97.52	\$ 74.77	
2021			\$ 427,321.87			\$ 115,008.46		\$ 312,313.41	\$ 281.68	\$ 1,056.56	\$ 774.88	
TOTALS			\$ 2,841,175.82			\$ 562,056.99		\$ 2,279,118.83	\$ 929.73	\$ 4,354.02	\$ 3,424.28	
TOTAL OVER DEFAULT June 2019-December 2021, Since Impementation of CAP Shopping Restrictions								\$	278,010.85			
TOTAL Avg. Charges PER CUSTOMER Since Implementation of CAP Shopping Restrictions								\$	1,263.58			

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-10, Attachment B; CAUSE-PA to FE I-4, Attachment A (PTC)

CAP SHOPPING - West Penn Power

July 2017-December 2021

Date	CAP Shopping Customer Count	CAP Shopping Usage (kWh)	CAP Shopping Billed	Avg \$/kWh - CAP Shopping	Avg \$/kWh Over Default Rate	Total Over Default	Default Service Price	Total Charges if Billed at Default Service Rate	Avg. Charges Over Default Per Shopping Customer	Avg. Charges Per Shopping Customer	Avg. Charges Per Shopping Customer at Default Rate
Jul-17	8,131	7,916,069	\$ 595,838.67	\$ 0.0753	\$ 0.0093	\$ 73,615.60	\$ 0.0660	\$ 522,223.07	\$ 9.05	\$ 73.28	\$ 64.23
Aug-17	7,913	7,689,152	\$ 580,597.59	\$ 0.0755	\$ 0.0095	\$ 73,344.23	\$ 0.0660	\$ 507,253.36	\$ 9.27	\$ 73.37	\$ 64.10
Sep-17	7,800	6,793,357	\$ 516,286.85	\$ 0.0760	\$ 0.0131	\$ 89,052.63	\$ 0.0629	\$ 427,234.22	\$ 11.42	\$ 66.19	\$ 54.77
Oct-17	7,745	6,459,608	\$ 493,246.90	\$ 0.0764	\$ 0.0135	\$ 87,002.15	\$ 0.0629	\$ 406,244.75	\$ 11.23	\$ 63.69	\$ 52.45
Nov-17	7,590	6,840,350	\$ 520,055.11	\$ 0.0760	\$ 0.0131	\$ 89,865.50	\$ 0.0629	\$ 430,189.61	\$ 11.84	\$ 68.52	\$ 56.68
Dec-17	7,274	9,460,507	\$ 722,259.27	\$ 0.0763	\$ 0.0149	\$ 140,532.69	\$ 0.0615	\$ 581,726.58	\$ 19.32	\$ 99.29	\$ 79.97
2017			\$ 3,428,284.39			\$ 553,412.80		\$ 2,874,871.59	\$ 72.13	\$ 444.34	\$ 372.21
18-Jan	7,272	12,314,895	\$ 937,163.64	\$ 0.0761	\$ 0.0146	\$ 179,920.75	\$ 0.0615	\$ 757,242.89	\$ 24.74	\$ 128.87	\$ 104.13
Feb-18	6,929	9,523,328	\$ 723,489.46	\$ 0.0760	\$ 0.0145	\$ 137,900.02	\$ 0.0615	\$ 585,589.44	\$ 19.90	\$ 104.41	\$ 84.51
Mar-18	6,444	7,462,861	\$ 583,876.36	\$ 0.0782	\$ 0.0174	\$ 129,761.27	\$ 0.0609	\$ 454,115.09	\$ 20.14	\$ 90.61	\$ 70.47
Apr-18	6,369	7,183,580	\$ 561,505.68	\$ 0.0782	\$ 0.0173	\$ 124,384.84	\$ 0.0609	\$ 437,120.84	\$ 19.53	\$ 88.16	\$ 68.63
May-18	6,154	5,288,006	\$ 416,871.16	\$ 0.0788	\$ 0.0180	\$ 95,095.99	\$ 0.0609	\$ 321,775.17	\$ 15.45	\$ 67.74	\$ 52.29
Jun-18	5,837	5,459,192	\$ 431,210.26	\$ 0.0790	\$ 0.0134	\$ 73,087.26	\$ 0.0656	\$ 358,123.00	\$ 12.52	\$ 73.88	\$ 61.35
Jul-18	5,342	5,501,170	\$ 426,257.80	\$ 0.0775	\$ 0.0119	\$ 65,381.05	\$ 0.0656	\$ 360,876.75	\$ 12.24	\$ 79.79	\$ 67.55
Aug-18	5,135	5,176,875	\$ 388,172.65	\$ 0.0750	\$ 0.0094	\$ 48,569.65	\$ 0.0656	\$ 339,603.00	\$ 9.46	\$ 75.59	\$ 66.13
Sep-18	4,904	5,002,315	\$ 378,992.43	\$ 0.0758	\$ 0.0198	\$ 99,112.91	\$ 0.0560	\$ 279,879.52	\$ 20.21	\$ 77.28	\$ 57.07
Oct-18	4,746	3,979,208	\$ 293,499.09	\$ 0.0738	\$ 0.0178	\$ 70,862.40	\$ 0.0560	\$ 222,636.69	\$ 14.93	\$ 61.84	\$ 46.91
Nov-18	4,597	4,271,456	\$ 323,826.32	\$ 0.0758	\$ 0.0199	\$ 84,838.36	\$ 0.0560	\$ 238,987.96	\$ 18.46	\$ 70.44	\$ 51.99
Dec-18	4,541	6,023,146	\$ 450,649.18	\$ 0.0748	\$ 0.0113	\$ 67,938.48	\$ 0.0635	\$ 382,710.70	\$ 14.96	\$ 99.24	\$ 84.28
2018			\$ 5,915,514.03			\$ 1,176,852.98		\$ 4,738,661.05	\$ 202.54	\$ 1,017.87	\$ 815.33
Jan-19	4,433	5,982,550	\$ 444,684.41	\$ 0.0743	\$ 0.0108	\$ 64,553.18	\$ 0.0635	\$ 380,131.23	\$ 14.56	\$ 100.31	\$ 85.75
Feb-19	4,211	6,100,836	\$ 467,373.60	\$ 0.0766	\$ 0.0131	\$ 79,726.48	\$ 0.0635	\$ 387,647.12	\$ 18.93	\$ 110.99	\$ 92.06
Mar-19	4,268	5,425,882	\$ 408,290.89	\$ 0.0752	\$ 0.0143	\$ 77,746.16	\$ 0.0609	\$ 330,544.73	\$ 18.22	\$ 95.66	\$ 77.45
Apr-19	4,148	4,071,273	\$ 319,479.25	\$ 0.0785	\$ 0.0176	\$ 71,457.30	\$ 0.0609	\$ 248,021.95	\$ 17.23	\$ 77.02	\$ 59.79
May-19	3,992	3,398,141	\$ 250,394.82	\$ 0.0737	\$ 0.0128	\$ 43,380.07	\$ 0.0609	\$ 207,014.75	\$ 10.87	\$ 62.72	\$ 51.86
Jun-19	2,883	2,204,731	\$ 166,833.03	\$ 0.0757	\$ 0.0205	\$ 45,198.02	\$ 0.0552	\$ 121,635.01	\$ 15.68	\$ 57.87	\$ 42.19
Jul-19	2,518	2,430,344	\$ 181,369.52	\$ 0.0746	\$ 0.0195	\$ 47,287.44	\$ 0.0552	\$ 134,082.08	\$ 18.78	\$ 72.03	\$ 53.25
Aug-19	2,289	2,417,066	\$ 179,730.36	\$ 0.0744	\$ 0.0192	\$ 46,380.83	\$ 0.0552	\$ 133,349.53	\$ 20.26	\$ 78.52	\$ 58.26
Sep-19	2,035	1,861,622	\$ 141,540.91	\$ 0.0760	\$ 0.0227	\$ 42,167.53	\$ 0.0534	\$ 99,373.38	\$ 20.72	\$ 69.55	\$ 48.83
Oct-19	1,968	1,516,616	\$ 115,923.96	\$ 0.0764	\$ 0.0231	\$ 34,967.00	\$ 0.0534	\$ 80,956.96	\$ 17.77	\$ 58.90	\$ 41.14
Nov-19	1,857	1,623,587	\$ 124,560.03	\$ 0.0767	\$ 0.0233	\$ 37,892.96	\$ 0.0534	\$ 86,667.07	\$ 20.41	\$ 67.08	\$ 46.67
Dec-19	1,836	2,204,706	\$ 166,323.90	\$ 0.0754	\$ 0.0178	\$ 39,332.83	\$ 0.0576	\$ 126,991.07	\$ 21.42	\$ 90.59	\$ 69.17
2019			\$ 2,966,504.68			\$ 630,089.80		\$ 2,336,414.88	\$ 214.84	\$ 941.25	\$ 726.41

Jan-20	1,825	2,368,248	\$ 174,829.49	\$ 0.0738	\$ 0.0162	\$ 38,418.41	\$ 0.0576	\$ 136,411.08	\$ 21.05	\$ 95.80	\$ 74.75
Feb-20	1,802	2,156,052	\$ 161,017.37	\$ 0.0747	\$ 0.0171	\$ 36,828.77	\$ 0.0576	\$ 124,188.60	\$ 20.44	\$ 89.35	\$ 68.92
Mar-20	1,798	2,035,576	\$ 150,999.85	\$ 0.0742	\$ 0.0178	\$ 36,254.43	\$ 0.0564	\$ 114,745.42	\$ 20.16	\$ 83.98	\$ 63.82
Apr-20	1,889	1,772,341	\$ 132,925.74	\$ 0.0750	\$ 0.0186	\$ 33,018.88	\$ 0.0564	\$ 99,906.86	\$ 17.48	\$ 70.37	\$ 52.89
May-20	1,998	1,820,791	\$ 136,393.29	\$ 0.0749	\$ 0.0185	\$ 33,755.30	\$ 0.0564	\$ 102,637.99	\$ 16.89	\$ 68.26	\$ 51.37
Jun-20	2,111	1,829,344	\$ 137,824.39	\$ 0.0753	\$ 0.0241	\$ 44,070.51	\$ 0.0513	\$ 93,753.88	\$ 20.88	\$ 65.29	\$ 44.41
Jul-20	2,160	2,210,692	\$ 159,988.81	\$ 0.0724	\$ 0.0211	\$ 46,690.84	\$ 0.0513	\$ 113,297.97	\$ 21.62	\$ 74.07	\$ 52.45
Aug-20	2,075	2,445,481	\$ 181,156.61	\$ 0.0741	\$ 0.0228	\$ 55,825.71	\$ 0.0513	\$ 125,330.90	\$ 26.90	\$ 87.30	\$ 60.40
Sep-20	2,041	2,103,495	\$ 155,865.86	\$ 0.0741	\$ 0.0252	\$ 52,983.92	\$ 0.0489	\$ 102,881.94	\$ 25.96	\$ 76.37	\$ 50.41
Oct-20	2,105	1,727,648	\$ 128,430.15	\$ 0.0743	\$ 0.0254	\$ 43,930.89	\$ 0.0489	\$ 84,499.26	\$ 20.87	\$ 61.01	\$ 40.14
Nov-20	2,086	1,753,996	\$ 132,648.62	\$ 0.0756	\$ 0.0267	\$ 46,860.68	\$ 0.0489	\$ 85,787.94	\$ 22.46	\$ 63.59	\$ 41.13
Dec-20	2,130	2,281,899	\$ 170,702.57	\$ 0.0748	\$ 0.0228	\$ 52,089.46	\$ 0.0520	\$ 118,613.11	\$ 24.46	\$ 80.14	\$ 55.69
2020			\$ 1,822,782.75			\$ 520,727.80		\$ 1,302,054.95	\$ 259.17	\$ 915.54	\$ 656.37
Jan-21	2,149	2,976,988	\$ 219,351.27	\$ 0.0737	\$ 0.0217	\$ 64,607.43	\$ 0.0520	\$ 154,743.84	\$ 30.06	\$ 102.07	\$ 72.01
Feb-21	2,096	2,859,113	\$ 212,611.74	\$ 0.0744	\$ 0.0224	\$ 63,995.05	\$ 0.0520	\$ 148,616.69	\$ 30.53	\$ 101.44	\$ 70.90
Mar-21	2,074	2,536,808	\$ 196,959.89	\$ 0.0776	\$ 0.0261	\$ 66,212.81	\$ 0.0515	\$ 130,747.08	\$ 31.93	\$ 94.97	\$ 63.04
Apr-21	2,034	1,800,091	\$ 147,472.33	\$ 0.0819	\$ 0.0304	\$ 54,695.64	\$ 0.0515	\$ 92,776.69	\$ 26.89	\$ 72.50	\$ 45.61
May-21	1,930	1,569,586	\$ 129,374.42	\$ 0.0824	\$ 0.0309	\$ 48,477.96	\$ 0.0515	\$ 80,896.46	\$ 25.12	\$ 67.03	\$ 41.92
Jun-21	1,865	1,563,033	\$ 132,019.45	\$ 0.0845	\$ 0.0274	\$ 42,817.16	\$ 0.0571	\$ 89,202.29	\$ 22.96	\$ 70.79	\$ 47.83
Jul-21	1,809	1,743,624	\$ 149,859.01	\$ 0.0859	\$ 0.0289	\$ 50,350.39	\$ 0.0571	\$ 99,508.62	\$ 27.83	\$ 82.84	\$ 55.01
Aug-21	1,767	1,769,000	\$ 151,288.70	\$ 0.0855	\$ 0.0285	\$ 50,331.87	\$ 0.0571	\$ 100,956.83	\$ 28.48	\$ 85.62	\$ 57.13
Sep-21	1,597	1,574,091	\$ 142,542.23	\$ 0.0906	\$ 0.0361	\$ 56,801.49	\$ 0.0545	\$ 85,740.74	\$ 35.57	\$ 89.26	\$ 53.69
Oct-21	1,628	1,265,036	\$ 117,781.57	\$ 0.0931	\$ 0.0386	\$ 48,875.06	\$ 0.0545	\$ 68,906.51	\$ 30.02	\$ 72.35	\$ 42.33
Nov-21	1,631	1,271,418	\$ 123,567.29	\$ 0.0972	\$ 0.0427	\$ 54,313.15	\$ 0.0545	\$ 69,254.14	\$ 33.30	\$ 75.76	\$ 42.46
Dec-21	1,643	1,728,429	\$ 171,580.41	\$ 0.0993	\$ 0.0423	\$ 73,094.53	\$ 0.0570	\$ 98,485.88	\$ 44.49	\$ 104.43	\$ 59.94
2021			\$ 1,894,408.31			\$ 674,572.53		\$ 1,219,835.78	\$ 367.18	\$ 1,019.06	\$ 651.87
TOTALS			\$ 16,027,494.16			\$ 3,555,655.90		\$ 12,471,838.26	\$ 1,115.87	\$ 4,338.05	\$ 3,222.18
TOTAL OVER DEFAULT June 2019-December 2021, Since Impementation of CAP Shopping Restrictions								\$	1,488,526.93		
TOTAL Avg. Charges PER CUSTOMER Since Implementation of CAP Shopping Restrictions								\$	761.39		

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-10, Attachment B; CAUSE-PA to FE I-4, Attachment A (PTC)

CAUSE-PA Exhibit 4(a)

Write-Offs - Residential Shopping Accounts				
		Accounts	Amount	Average Write-Off
2018	MetEd	9,421	\$ 7,292,467.62	\$ 774.07
	Penelec	9,150	\$ 6,668,884.93	\$ 728.84
	Penn Power	1,954	\$ 1,525,249.70	\$ 780.58
	West Penn Power	8,431	\$ 6,999,405.23	\$ 830.20
	Total	28,956	\$ 22,486,007.48	\$ 776.56
2019	MetEd	5,725	\$ 5,946,678.72	\$ 1,038.72
	Penelec	5,134	\$ 5,254,102.09	\$ 1,023.39
	Penn Power	1,173	\$ 1,275,249.56	\$ 1,087.17
	West Penn Power	5,707	\$ 6,564,648.45	\$ 1,150.28
	Total	17,739	\$ 19,040,678.82	\$ 1,073.38
2020	MetEd	4,071	\$ 3,696,864.86	\$ 908.10
	Penelec	3,854	\$ 3,418,814.06	\$ 887.08
	Penn Power	857	\$ 831,962.49	\$ 970.78
	West Penn Power	3,987	\$ 4,253,237.19	\$ 1,066.78
	Total	12,769	\$ 12,200,878.60	\$ 955.51
2021	MetEd	3,374	\$ 4,150,783.91	\$ 1,230.23
	Penelec	3,166	\$ 3,777,000.95	\$ 1,192.99
	Penn Power	650	\$ 787,476.31	\$ 1,211.50
	West Penn Power	3,013	\$ 3,579,225.82	\$ 1,187.93
	Total	10,203	\$ 12,294,486.99	\$ 1,204.99
Write-Offs - Residential Default Service Accounts				
		Accounts	Amount	Average Write-Off
2018	MetEd	11,030	\$ 7,794,388.23	\$ 706.65
	Penelec	12,217	\$ 8,706,406.16	\$ 712.65
	Penn Power	2,649	\$ 1,843,453.04	\$ 695.91
	West Penn Power	12,002	\$ 8,440,974.22	\$ 703.30
	Total	37,898	\$ 26,785,221.65	\$ 706.77
2019	MetEd	12,290	\$ 9,035,331.21	\$ 735.18
	Penelec	13,702	\$ 9,972,889.95	\$ 727.84
	Penn Power	2,899	\$ 2,183,307.25	\$ 753.12
	West Penn Power	13,155	\$ 9,541,125.55	\$ 725.29
	Total	42,046	\$ 30,732,653.96	\$ 730.93
2020	MetEd	10,673	\$ 6,851,514.32	\$ 641.95
	Penelec	11,825	\$ 7,821,546.94	\$ 661.44
	Penn Power	2,614	\$ 1,558,713.02	\$ 596.29
	West Penn Power	11,272	\$ 6,735,116.23	\$ 597.51
	Total	36,384	\$ 22,966,890.51	\$ 631.24
2021	MetEd	10,019	\$ 7,888,414.53	\$ 787.35
	Penelec	10,850	\$ 8,703,172.26	\$ 802.14
	Penn Power	2,187	\$ 1,602,156.35	\$ 732.58
	West Penn Power	10,002	\$ 7,170,664.55	\$ 716.92
	Total	33,058	\$ 25,364,407.69	\$ 767.27

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-13, Attachment A

CAUSE-PA Exhibit 4(b)

Write-Offs - Confirmed Low Income Shopping (non-CAP) Accounts				
		Accounts	Amount	Average Write-Off
2018	MetEd	4,060	\$ 3,813,702.80	\$ 939.34
	Penelec	4,363	\$ 3,741,951.40	\$ 857.66
	Penn Power	852	\$ 858,276.08	\$ 1,007.37
	West Penn Power	3,135	\$ 3,146,399.87	\$ 1,003.64
	Total	12,410	\$ 11,560,330.15	\$ 931.53
2019	MetEd	2,462	\$ 3,032,846.05	\$ 1,231.86
	Penelec	2,454	\$ 2,956,167.48	\$ 1,204.63
	Penn Power	560	\$ 736,168.23	\$ 1,314.59
	West Penn Power	2,280	\$ 3,136,864.06	\$ 1,375.82
	Total	7,756	\$ 9,862,045.82	\$ 1,271.54
2020	MetEd	1,721	\$ 2,059,772.76	\$ 1,196.85
	Penelec	1,678	\$ 1,856,342.82	\$ 1,106.28
	Penn Power	370	\$ 452,879.66	\$ 1,224.00
	West Penn Power	1,644	\$ 2,217,568.29	\$ 1,348.89
	Total	5,413	\$ 6,586,563.53	\$ 1,216.80
2021	MetEd	1,223	\$ 2,109,754.39	\$ 1,725.06
	Penelec	1,209	\$ 1,861,943.82	\$ 1,540.07
	Penn Power	220	\$ 393,632.48	\$ 1,789.24
	West Penn Power	996	\$ 1,693,124.14	\$ 1,699.92
	Total	3,648	\$ 6,058,454.83	\$ 1,660.76
Write-Offs - Confirmed Low Income Default Service (non-CAP) Accounts				
		Accounts	Amount	Average Write-Off
2018	MetEd	4,070	\$ 3,888,063.80	\$ 955.30
	Penelec	4,958	\$ 4,471,853.85	\$ 901.95
	Penn Power	1,049	\$ 964,687.17	\$ 919.63
	West Penn Power	3,383	\$ 3,404,785.87	\$ 1,006.44
	Total	13,460	\$ 12,729,390.69	\$ 945.72
2019	MetEd	4,528	\$ 4,578,372.78	\$ 1,011.12
	Penelec	5,601	\$ 5,211,274.09	\$ 930.42
	Penn Power	1,074	\$ 1,094,589.70	\$ 1,019.17
	West Penn Power	4,286	\$ 4,466,024.57	\$ 1,042.00
	Total	15,489	\$ 15,350,261.14	\$ 991.04
2020	MetEd	3,724	\$ 3,338,277.19	\$ 896.42
	Penelec	4,546	\$ 4,020,451.82	\$ 884.39
	Penn Power	936	\$ 790,844.00	\$ 844.92
	West Penn Power	3,546	\$ 3,277,280.57	\$ 924.22
	Total	12,752	\$ 11,426,853.58	\$ 896.08
2021	MetEd	2,830	\$ 3,495,264.00	\$ 1,235.08
	Penelec	3,354	\$ 3,943,717.48	\$ 1,175.83
	Penn Power	598	\$ 763,094.88	\$ 1,276.08
	West Penn Power	2,621	\$ 3,198,407.32	\$ 1,220.30
	Total	9,403	\$ 11,400,483.68	\$ 1,212.43

*The information in this Exhibit was derived from data in CAUSE-PA to FE I-13, Attachment A

CAUSE-PA Exhibit 4(c)

Write-Offs - CAP Shopping Accounts				
		Accounts	Amount	Average Write-Off
2018	MetEd	1,814	\$ 2,037,969.84	\$ 1,123.47
	Penelec	1,822	\$ 1,787,021.52	\$ 980.80
	Penn Power	409	\$ 413,895.17	\$ 1,011.97
	West Penn Power	1,907	\$ 2,422,704.46	\$ 1,270.43
	Total	5,952	\$ 6,661,590.99	\$ 1,119.22
2019	MetEd	1,121	\$ 1,795,981.52	\$ 1,602.12
	Penelec	1,074	\$ 1,475,649.54	\$ 1,373.98
	Penn Power	222	\$ 319,951.21	\$ 1,441.22
	West Penn Power	1,220	\$ 2,085,920.23	\$ 1,709.77
	Total	3,637	\$ 5,677,502.50	\$ 1,561.04
2020	MetEd	626	\$ 878,665.11	\$ 1,403.62
	Penelec	721	\$ 951,237.04	\$ 1,319.33
	Penn Power	131	\$ 207,928.80	\$ 1,587.24
	West Penn Power	688	\$ 1,149,598.34	\$ 1,670.93
	Total	2,166	\$ 3,187,429.29	\$ 1,471.57
2021	MetEd	482	\$ 916,852.30	\$ 1,902.18
	Penelec	568	\$ 960,486.24	\$ 1,691.00
	Penn Power	82	\$ 148,871.77	\$ 1,815.51
	West Penn Power	460	\$ 960,550.61	\$ 2,088.15
	Total	1,592	\$ 2,986,760.92	\$ 1,876.11
Write-Offs - CAP Default Service				
		Accounts	Amount	Average Write-Off
2018	MetEd	1,999	\$ 2,064,351.74	\$ 1,032.69
	Penelec	2,406	\$ 2,463,749.49	\$ 1,024.00
	Penn Power	477	\$ 536,911.76	\$ 1,125.60
	West Penn Power	2,464	\$ 2,917,953.17	\$ 1,184.23
	Total	7,346	\$ 7,982,966.16	\$ 1,086.71
2019	MetEd	2,271	\$ 2,382,610.10	\$ 1,049.15
	Penelec	2,788	\$ 2,864,188.74	\$ 1,027.33
	Penn Power	508	\$ 618,807.53	\$ 1,218.13
	West Penn Power	2,253	\$ 2,799,021.35	\$ 1,242.35
	Total	7,820	\$ 8,664,627.72	\$ 1,108.01
2020	MetEd	1,886	\$ 1,904,409.69	\$ 1,009.76
	Penelec	2,411	\$ 2,225,690.98	\$ 923.14
	Penn Power	443	\$ 426,695.16	\$ 963.19
	West Penn Power	1,790	\$ 1,781,402.61	\$ 995.20
	Total	6,530	\$ 6,338,198.44	\$ 970.63
2021	MetEd	2,028	\$ 2,189,930.34	\$ 1,079.85
	Penelec	2,548	\$ 2,548,523.39	\$ 1,000.21
	Penn Power	445	\$ 388,278.60	\$ 872.54
	West Penn Power	1,805	\$ 1,963,333.47	\$ 1,087.72
	Total	6,826	\$ 7,090,065.80	\$ 1,038.69

RESIDENTIAL PAYMENT TROUBLED ACCOUNTS

		Avg. Residential Default Service Accounts	Payment Troubled Default Service Accounts	% Payment Troubled, Default Service	Avg. Residential Shopping Accounts	Payment Troubled Residential Shopping Accounts	% Payment Troubled, Residential Shopping Accounts
2017	MetEd	326,395	4945	1.52%	172,798	2945	1.70%
	Penelec	349,993	5542	1.58%	151,539	2601	1.72%
	Penn Power	104,396	1329	1.27%	39,890	589	1.48%
	West Penn Power	452,529	4076	0.90%	172,385	2016	1.17%
	Total	1,233,313	15892	1.29%	536,612	8151	1.52%
2018	MetEd	347,053	5315	1.53%	155,057	2593	1.67%
	Penelec	367,391	5542	1.51%	134,064	2134	1.59%
	Penn Power	109,379	1262	1.15%	35,907	493	1.37%
	West Penn Power	469,176	4487	0.96%	157,277	2007	1.28%
	Total	1,292,999	16606	1.28%	482,305	7227	1.50%
2019	MetEd	362,542	5585	1.54%	142,143	2706	1.90%
	Penelec	378,740	5935	1.57%	122,137	2361	1.93%
	Penn Power	112,075	1414	1.26%	33,942	544	1.60%
	West Penn Power	480,196	5203	1.08%	147,303	2928	1.99%
	Total	1,333,553	18137	1.36%	445,525	8539	1.92%
2020	MetEd	373,769	3414	0.91%	134,985	1462	1.08%
	Penelec	384,597	3440	0.89%	117,038	1209	1.03%
	Penn Power	113,888	880	0.77%	33,132	339	1.02%
	West Penn Power	488,791	3621	0.74%	141,247	1298	0.92%
	Total	1,361,045	11355	0.83%	426,402	4308	1.01%
2021	MetEd	389,719	6426	1.65%	122,497	2954	2.41%
	Penelec	396,178	6993	1.77%	105,638	2458	2.33%
	Penn Power	118,456	1571	1.33%	29,682	579	1.95%
	West Penn Power	505,587	6474	1.28%	126,828	2813	2.22%
	Total	1,409,940	21464	1.52%	384,645	8804	2.29%

*Data for this response is derived from CAUSE-PA to FE I-1, Attachment A and CAUSE-PA to FE I-14, Attachment A

CAUSE-PA Exhibit 5(b)

CAP PAYMENT TROUBLED ACCOUNTS

		Avg. CAP Default Service Accounts	Payment Troubled CAP Default Service Accounts	% Payment Troubled CAP Default Service	Avg. CAP Shopping Accounts	Payment Troubled CAP Shopping Accounts	% Payment Troubled CAP Shopping Accounts
2017	MetEd	10,131	269	2.66%	4,744	159	3.35%
	Penelec	15189	296	1.95%	5,965	177	2.97%
	Penn Power	3441	69	2.01%	1,227	45	3.67%
	West Penn Power	17330	256	1.48%	8,238	148	1.80%
	Total	46,091	890	1.93%	20,174	529	2.62%
2018	MetEd	11261	275	2.44%	3,940	118	2.99%
	Penelec	16362	275	1.68%	4,848	116	2.39%
	Penn Power	3678	59	1.60%	962	31	3.22%
	West Penn Power	16460	259	1.57%	5,689	136	2.39%
	Total	47761	868	1.82%	15,439	401	2.60%
2019	MetEd	11503	248	2.16%	2,490	139	5.58%
	Penelec	16285	279	1.71%	3,151	119	3.78%
	Penn Power	3565	74	2.08%	652	26	3.99%
	West Penn Power	14196	421	2.97%	3,037	219	7.21%
	Total	45549	1022	2.24%	9,330	503	5.39%
2020	MetEd	14491	242	1.67%	1,694	122	7.20%
	Penelec	19406	248	1.28%	2,229	92	4.13%
	Penn Power	4315	61	1.41%	436	28	6.42%
	West Penn Power	17089	256	1.50%	2,002	96	4.80%
	Total	55301	807	1.46%	6,361	338	5.31%
2021	MetEd	18803	409	2.18%	1,638	184	11.23%
	Penelec	24960	405	1.62%	2,109	146	6.92%
	Penn Power	5549	83	1.50%	401	34	8.48%
	West Penn Power	22001	388	1.76%	1,852	202	10.91%
	Total	71313	1285	1.80%	6,000	566	9.43%

*Data for this response is derived from CAUSE-PA to FE I-10, Attachment A and CAUSE-PA to FE I-14, Attachment A

CAUSE-PA Exhibit 6(a)

RESIDENTIAL TERMINATIONS

		Avg. Default Service Accounts	Default Service Terminations	Default Service Termination Rate	Avg. Shopping Accounts	Shopping Terminations	Shopping Termination Rates
2018	MetEd	347,053	12421	3.58%	155,057	8109	5.23%
	Penelec	367,391	11635	3.17%	134,064	5875	4.38%
	Penn Power	109,379	2369	2.17%	35,907	1255	3.50%
	West Penn Power	469,176	7681	1.64%	157,277	4610	2.93%
	Total	1,292,999	34106	2.64%	482,305	19849	4.12%
2019	MetEd	362,542	13868	3.83%	142,143	7758	5.46%
	Penelec	378,740	12519	3.31%	122,137	5558	4.55%
	Penn Power	112,075	2586	2.31%	33,942	1167	3.44%
	West Penn Power	480,196	10847	2.26%	147,303	6068	4.12%
	Total	1,333,553	39820	2.99%	445,525	20551	4.61%
2020	MetEd	373,769	534	0.14%	134,985	208	0.15%
	Penelec	384,597	571	0.15%	117,038	168	0.14%
	Penn Power	113,888	115	0.10%	33,132	34	0.10%
	West Penn Power	488,791	548	0.11%	141,247	227	0.16%
	Total	1,361,045	1768	0.13%	426,402	637	0.15%
2021	MetEd	389,719	15156	3.89%	122,497	6318	5.16%
	Penelec	396,178	13012	3.28%	105,638	4530	4.29%
	Penn Power	118,456	1647	1.39%	29,682	593	2.00%
	West Penn Power	505,587	10165	2.01%	126,828	3916	3.09%
	Total	1,409,940	39980	2.84%	384,645	15357	3.99%

*Data for this response is derived from CAUSE-PA to FE I-1, Attachment A and CAUSE-PA to FE II-2, Attachment A

CAUSE-PA Exhibit 6(b)

CAP TERMINATIONS

		Avg. Default Service Accounts	Default Service Terminations	Default Service Termination Rate	Avg. Shopping Accounts	Shopping Terminations	Shopping Termination Rates
2018	MetEd	11261	1148	10.19%	3,940	931	23.63%
	Penelec	16362	1172	7.16%	4,848	725	14.95%
	Penn Power	3678	216	5.87%	962	152	15.80%
	West Penn Power	16460	1108	6.73%	5,689	833	14.64%
	Total	47761	3644	7.63%	15,439	2641	17.11%
2019	MetEd	11503	1193	10.37%	2,490	730	29.32%
	Penelec	16285	1154	7.09%	3,151	518	16.44%
	Penn Power	3565	211	5.92%	652	127	19.48%
	West Penn Power	14196	1005	7.08%	3,037	613	20.18%
	Total	45549	3563	7.82%	9,330	1988	21.31%
2020	MetEd	14491	13	0.09%	1,694	6	0.35%
	Penelec	19406	9	0.05%	2,229	4	0.18%
	Penn Power	4315	4	0.09%	436	0	0.00%
	West Penn Power	17089	14	0.08%	2,002	7	0.35%
	Total	55301	40	0.07%	6,361	17	0.27%
2021	MetEd	18803	2337	12.43%	1,638	708	43.22%
	Penelec	24960	2080	8.33%	2,109	562	26.65%
	Penn Power	5549	218	3.93%	401	58	14.46%
	West Penn Power	22001	1620	7.36%	1,852	439	23.70%
	Total	71313	6255	8.77%	6,000	1767	29.45%

*Data for this response is derived from CAUSE-PA to FE I-10, Attachment A, CAUSE-PA to FE I-11, Attachment A, and CAUSE-PA to FE II-2, Attachment A

CAUSE-PA Exhibit 7

CAP Shopping Accounts, January 2020 to March 2020				
	CAP Shopping Accounts Over Default	CAP Shopping Accounts At/Below Default	Total CAP Shopping Accounts	% CAP Shopping Customers Charged Over Default
Jan-20				
MetEd	986	473	1459	68%
Penelec	1238	762	2000	62%
Penn Power	397	6	403	99%
West Penn	1063	714	1777	60%
Feb-20				
MetEd	990	497	1487	67%
Penelec	1248	761	2009	62%
Penn Power	385	7	392	98%
West Penn	1052	715	1767	60%
Mar-20				
MetEd	1355	126	1481	91%
Penelec	1793	761	2554	70%
Penn Power	394	5	399	99%
West Penn	1565	193	1758	89%

*Data for this table derived from OCA to FE I-2, Attachment A - Highly Confidential. All confidential information was redacted in the preparation of this chart.

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX A

RESUME OF HARRY S. GELLER

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:

Harpur College, State University of New York at Binghamton, B.A. 1966

Washington College of Law, American University, J.D. 1969

New York University Law School, courses in Urban Affairs and Poverty Law, as part of
Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:

1988 – 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS

New York State

Commonwealth of Pennsylvania

United States District Court, Middle District of Pennsylvania

Cases in which Harry S. Geller has participated as a witness before the Pennsylvania Public Utility Commission since July 1, 2015

- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385, R- 2021-3027386.
- Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021-3024750.
- Pennsylvania Public Utility Commission v. PECO Energy – Electric Division, R-2021-3024601.
- Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
- Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
- Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31 , 2025, Docket No. P-2020-3019356.
- Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
- Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
- Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R2018-3003558 et seq.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
- Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company,
- Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
- Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.

- PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
- Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
- Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.
- Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.
- Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.

Appendix B: Cited Interrogatory Responses

Interrogatories of CAUSE-PA to First Energy

CAUSE-PA to FE I-1, Attachments A-C – Revised.

CAUSE-PA to FE I-2.

CAUSE-PA to FE I-4, Attachment A.

CAUSE-PA to FE I-7, Attachment A.

CAUSE-PA to FE I-10, Attachment A & B.

CAUSE-PA to FE I-11, Attachment A.

CAUSE-PA to FE I-12.

CAUSE-PA to FE I-13, Attachment A.

CAUSE-PA to FE I-14, Attachment A.

CAUSE-PA to FE I-18.

CAUSE-PA to FE II-2, Attachment A.

CAUSE-PA to FE II-3.

CAUSE-PA to FE II-4.

CAUSE-PA to FE II-5.

CAUSE-PA to FE II-9.

CAUSE-PA to FE II-12.

CAUSE-PA to FE III-3.

CAUSE-PA to FE III-6.

Interrogatories of the Office of Consumer Advocate to First Energy

OCA to FE I-2a.

OCA to FE I-7a-f.

OCA to FE I-10a-c.

OCA to FE I-12.

Interrogatories of Shipley to First Energy

Shipley to FE I-5.

REVISED ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 1

Witness: J. M. Savage

Page 1 of 2

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 1**

“In a live Excel spreadsheet, please provide the following for January 2015 to date, disaggregated by month and by year:

- (a) The total number of residential customers.
- (b) The total usage of residential customers
- (c) The total amount billed for generation supply charges for residential customers.”

REVISED RESPONSE DATED February 3, 2022:

- (a) See REVISED ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment A.
- (b) See REVISED ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment B.
- (c) See REVISED ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment C.

Please note that the revenue data for generation supplier charges requested in subpart (c) of this interrogatory prior to August 2017 is not available. Aggregate Default Service revenues for the residential class are available prior to August 2017 and are included for this response.

ORIGINAL RESPONSE DATED January 24, 2022:

- (a) See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment A.
- (b) See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment B.

REVISED ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 1

Witness: J. M. Savage

Page 2 of 2

- (c) See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 001, Attachment C.

Please note that the revenue data for generation supplier charges requested in subpart (c) of this interrogatory prior to July 2017 is not available. Aggregate Default Service revenues for the residential class are available prior to July 2017 and are included for this response.

CAUSE-PA STATEMENT 1, APPENDIX B

REVISED ME/PN/PP/WP Response to CAUSE-PA Set I, No. 001

Attachment A

Witness: J. M. Savage

Page 1 of 1

		Default Service Residential Customers				Shopping Residential Customers				Total Residential Customers			
		ME	PN	PP	WP	ME	PN	PP	WP	ME	PN	PP	WP
2017	8	327,102	350,544	104,679	451,944	171,980	150,280	39,516	169,770	499,082	500,824	144,195	621,714
2017	9	329,272	352,820	105,303	452,824	169,842	147,877	38,934	168,784	499,114	500,697	144,237	621,608
2017	10	331,916	355,486	106,210	454,268	167,911	145,637	38,229	167,975	499,827	501,123	144,439	622,243
2017	11	334,318	357,892	106,702	455,584	166,295	143,829	37,887	167,270	500,613	501,721	144,589	622,854
2017	12	336,241	359,524	107,209	457,177	164,908	142,441	37,636	166,071	501,149	501,965	144,845	623,248
2018	1	338,339	361,140	107,609	462,193	163,379	141,122	37,385	164,670	501,718	502,262	144,994	626,863
2018	2	339,936	362,180	108,070	464,042	161,934	140,147	37,015	162,689	501,870	502,327	145,085	626,731
2018	3	341,743	363,434	108,337	465,086	160,129	138,798	36,798	161,510	501,872	502,232	145,135	626,596
2018	4	342,998	363,687	108,610	466,408	158,858	138,323	36,550	160,235	501,856	502,010	145,160	626,643
2018	5	344,691	364,428	108,955	467,515	156,926	136,595	36,225	158,489	501,617	501,023	145,180	626,004
2018	6	346,155	365,987	109,125	468,483	155,290	134,666	35,970	157,057	501,445	500,653	145,095	625,540
2018	7	347,846	367,756	109,514	469,376	154,016	132,983	35,738	156,454	501,862	500,739	145,252	625,830
2018	8	349,458	369,064	109,904	471,303	152,675	131,796	35,431	154,834	502,133	500,860	145,335	626,137
2018	9	350,760	370,313	110,149	471,995	151,178	130,396	35,162	154,039	501,938	500,709	145,311	626,034
2018	10	352,708	372,032	110,512	473,308	149,838	129,165	35,014	153,214	502,546	501,197	145,526	626,522
2018	11	353,956	373,343	110,745	474,246	149,026	128,384	34,904	152,870	502,982	501,727	145,649	627,116
2018	12	355,819	374,001	110,999	474,972	147,680	127,834	34,727	152,466	503,499	501,835	145,726	627,438
2019	1	357,135	375,195	111,228	476,255	146,827	126,855	34,616	151,571	503,962	502,050	145,844	627,826
2019	2	358,273	376,385	111,328	476,886	145,874	125,723	34,570	151,077	504,147	502,108	145,898	627,963
2019	3	359,200	376,975	111,570	477,777	144,934	125,019	34,367	150,201	504,134	501,994	145,937	627,978
2019	4	359,772	377,688	111,832	478,533	144,326	123,957	34,128	149,335	504,098	501,645	145,960	627,868
2019	5	360,875	378,243	111,893	478,818	143,074	122,454	34,035	148,263	503,949	500,697	145,928	627,081
2019	6	361,558	378,406	111,930	479,281	142,370	121,691	33,982	147,487	503,928	500,097	145,912	626,768
2019	7	362,837	378,925	111,982	480,328	141,434	121,235	33,959	146,490	504,271	500,160	145,941	626,818
2019	8	364,127	379,281	112,186	481,352	140,245	120,523	33,747	145,231	504,372	499,804	145,933	626,583
2019	9	365,184	379,756	112,434	482,467	139,809	120,295	33,607	144,712	504,993	500,051	146,041	627,179
2019	10	366,134	380,364	112,679	482,823	139,322	119,907	33,447	144,631	505,456	500,271	146,126	627,454
2019	11	367,268	381,079	112,914	483,318	138,917	119,685	33,380	144,769	506,185	500,764	146,294	628,087
2019	12	367,911	381,246	112,903	483,405	138,828	119,755	33,517	145,003	506,739	501,001	146,420	628,408
2020	1	368,776	381,946	112,977	484,084	138,443	119,210	33,580	144,705	507,219	501,156	146,557	628,789
2020	2	369,006	381,462	112,779	484,118	138,226	119,510	33,829	144,669	507,232	500,972	146,608	628,787
2020	3	369,416	381,468	112,762	484,481	138,333	119,661	33,956	144,541	507,749	501,129	146,718	629,022
2020	4	370,313	382,228	112,981	484,956	137,509	119,008	33,801	144,107	507,822	501,236	146,782	629,063
2020	5	371,091	382,664	113,275	485,599	136,856	118,384	33,550	143,537	507,947	501,048	146,825	629,136
2020	6	372,194	383,272	113,486	486,629	136,234	118,039	33,463	142,912	508,428	501,311	146,949	629,541
2020	7	373,665	384,278	113,889	488,166	135,140	117,401	33,194	141,729	508,805	501,679	147,083	629,895
2020	8	375,015	385,339	114,181	490,272	134,100	116,535	32,987	140,228	509,115	501,874	147,168	630,500
2020	9	376,580	386,001	114,553	491,277	133,007	116,111	32,706	139,624	509,587	502,112	147,259	630,901
2020	10	377,995	386,983	114,878	492,780	131,837	115,093	32,414	138,301	509,832	502,076	147,292	631,081
2020	11	379,680	388,365	115,235	494,979	130,821	114,100	32,237	136,729	510,501	502,465	147,472	631,708
2020	12	381,267	389,964	115,635	497,111	129,567	112,695	31,914	134,954	510,834	502,659	147,549	632,065
2021	1	382,951	391,043	116,191	498,753	128,174	111,514	31,468	133,410	511,125	502,557	147,659	632,163
2021	2	383,967	392,241	116,694	500,070	127,378	110,503	31,131	132,256	511,345	502,744	147,825	632,326
2021	3	385,413	393,197	117,184	501,477	126,297	109,460	30,724	131,050	511,710	502,657	147,908	632,527
2021	4	386,664	393,739	117,523	502,394	125,303	108,596	30,438	130,198	511,967	502,335	147,961	632,592
2021	5	387,474	394,177	117,908	503,057	124,165	107,507	30,058	129,192	511,639	501,684	147,966	632,249
2021	6	388,955	395,342	118,370	504,597	122,994	106,170	29,701	127,839	511,949	501,512	148,071	632,436
2021	7	390,310	396,229	118,689	505,802	121,650	105,109	29,417	126,150	511,960	501,338	148,106	631,952
2021	8	391,653	397,311	119,384	507,553	120,812	104,273	28,858	124,969	512,465	501,584	148,242	632,522
2021	9	392,473	397,965	119,547	508,450	120,179	103,174	28,784	123,850	512,652	501,139	148,331	632,300
2021	10	393,508	398,883	119,658	509,337	119,140	102,183	28,707	122,850	512,648	501,066	148,365	632,187
2021	11	395,213	400,627	119,930	511,235	118,210	100,987	28,639	121,586	513,423	501,614	148,569	632,821
2021	12	397,786	402,275	120,367	513,198	115,960	99,375	28,307	119,738	513,746	501,650	148,674	632,936

		ME kWh			PN kWh			PP kWh			WP kWh			
Year	Month	Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential	
RES	2017	08	324,742,524	186,140,974	510,883,498	245,623,167	120,382,194	366,005,361	99,434,688	40,219,504	139,654,192	430,667,561	170,005,650	600,673,211
RES	2017	09	264,286,859	147,002,621	411,289,480	215,545,036	94,136,058	309,681,094	85,380,051	33,428,655	118,808,706	376,818,247	144,999,733	521,817,980
RES	2017	10	253,620,212	141,336,109	394,956,321	206,081,481	93,380,338	299,461,819	82,707,593	31,816,342	114,523,935	361,878,946	138,711,728	500,590,674
RES	2017	11	233,642,700	121,517,115	355,159,815	171,088,593	94,069,349	311,157,942	82,813,251	30,855,476	113,668,727	346,897,453	130,799,476	477,690,702
RES	2017	12	313,139,923	162,847,781	475,987,704	269,301,961	115,188,731	384,490,692	113,419,287	41,402,461	154,821,748	478,691,213	175,965,419	654,656,632
RES	2018	01	416,782,423	218,504,797	635,287,220	337,853,876	145,990,865	483,844,741	148,754,620	54,490,000	203,244,620	627,850,077	243,126,652	870,976,729
RES	2018	02	367,123,344	186,106,409	553,229,753	296,380,205	123,391,558	419,771,763	121,338,840	43,592,121	164,930,961	509,301,197	185,154,831	694,456,028
RES	2018	03	317,937,414	157,105,914	475,043,328	262,727,562	108,505,247	371,232,809	104,641,415	36,035,663	140,677,078	446,081,402	161,052,003	607,133,405
RES	2018	04	300,522,073	147,078,727	447,600,800	257,275,008	105,267,601	362,542,609	101,368,257	35,591,684	136,959,941	430,810,791	155,835,887	586,646,678
RES	2018	05	249,352,547	120,513,746	369,866,293	87,221,432	300,430,084	81,383,581	28,360,431	109,744,012	106,410,912	346,410,794	124,409,789	470,820,583
RES	2018	06	269,803,241	131,778,657	401,581,898	223,517,310	89,843,348	313,360,658	96,634,648	33,908,204	130,542,852	415,647,859	150,257,440	565,905,299
RES	2018	07	343,360,066	164,058,058	507,418,124	261,005,426	104,666,084	365,671,510	111,308,846	38,508,161	149,817,007	471,956,236	170,698,440	642,654,676
RES	2018	08	362,055,609	170,995,874	533,051,483	269,949,986	105,729,201	375,679,187	110,106,508	38,391,404	148,497,912	460,095,900	164,788,242	624,884,142
RES	2018	09	363,749,988	168,771,358	532,521,346	279,508,055	108,065,512	387,573,567	111,261,528	37,783,147	149,044,675	475,975,573	167,682,735	643,658,308
RES	2018	10	267,695,991	123,107,645	390,803,636	223,481,431	86,540,791	310,022,222	87,794,071	29,977,895	117,771,966	380,285,291	134,468,502	514,753,793
RES	2018	11	263,200,941	118,842,280	382,043,221	237,522,657	87,343,055	324,865,712	89,504,362	29,689,988	119,194,350	382,977,013	131,611,399	514,588,412
RES	2018	12	352,866,947	153,906,588	506,773,535	296,043,829	106,467,634	402,511,463	116,551,632	37,605,718	154,157,350	496,931,691	162,690,547	659,622,238
RES	2019	01	397,708,529	176,066,477	573,775,006	319,911,261	119,151,572	439,062,833	125,883,549	41,227,709	167,111,258	543,076,226	186,457,899	729,534,125
RES	2019	02	409,220,077	173,376,163	582,596,240	323,971,101	115,245,099	439,216,200	135,139,489	43,222,824	178,362,313	581,069,051	189,522,828	770,591,879
RES	2019	03	372,116,201	155,803,861	527,920,062	297,860,555	105,079,739	402,940,294	116,072,599	37,171,716	153,244,315	497,636,191	162,661,514	660,297,705
RES	2019	04	298,364,670	125,011,152	423,375,822	250,334,318	88,216,173	338,550,491	94,462,663	30,115,343	124,578,006	402,098,739	130,673,558	532,772,297
RES	2019	05	241,056,496	101,384,567	342,441,063	212,122,592	74,620,997	286,743,589	77,639,810	24,880,378	102,520,188	326,717,082	107,407,669	434,124,751
RES	2019	06	268,426,393	114,622,941	383,049,334	208,167,347	73,254,887	281,422,234	83,681,549	26,828,981	110,510,530	367,376,191	123,011,936	490,388,127
RES	2019	07	350,879,264	146,231,592	497,110,856	257,720,172	89,797,112	347,517,284	109,485,775	35,066,910	144,552,685	465,923,963	153,197,989	619,121,952
RES	2019	08	410,719,757	170,377,852	581,097,609	292,955,631	101,549,959	394,505,590	119,667,302	38,240,203	157,907,505	516,629,547	169,611,766	686,241,313
RES	2019	09	341,736,701	139,560,060	481,296,761	252,349,345	86,852,679	339,202,024	102,404,019	32,404,129	134,808,148	454,662,170	146,777,667	601,439,837
RES	2019	10	272,341,757	110,314,748	382,656,505	222,586,036	75,908,071	298,494,107	85,014,514	26,819,997	111,834,511	372,176,451	119,399,862	491,576,313
RES	2019	11	269,626,316	106,155,512	375,781,828	235,238,442	77,938,524	313,176,966	84,596,649	26,052,624	110,649,273	363,458,067	112,861,888	476,319,955
RES	2019	12	351,913,434	137,027,644	488,941,078	286,125,201	94,699,780	380,824,981	111,775,320	34,531,722	146,307,042	482,704,729	149,271,195	631,975,924
RES	2020	01	395,758,158	152,568,999	548,327,157	309,703,926	101,263,130	410,967,056	123,344,396	37,873,933	161,218,329	536,874,478	165,092,061	701,966,539
RES	2020	02	371,655,332	142,327,130	513,982,462	293,638,161	96,035,967	389,674,128	110,661,883	34,150,153	144,812,036	480,990,354	147,479,110	628,469,464
RES	2020	03	352,711,317	134,694,745	487,406,062	286,716,448	93,648,659	380,365,107	108,136,313	33,432,142	141,568,455	464,531,847	141,554,288	606,086,135
RES	2020	04	302,835,113	116,058,458	418,893,571	251,214,106	82,256,255	333,470,361	93,392,794	29,130,128	122,522,922	396,337,319	120,628,996	516,966,315
RES	2020	05	293,507,118	111,800,731	405,307,849	246,637,547	80,069,010	326,706,557	92,479,713	28,662,406	121,142,119	395,900,828	119,931,357	515,832,185
RES	2020	06	302,537,068	116,028,619	418,565,687	241,518,217	78,762,704	320,280,921	96,349,274	29,660,797	126,010,071	407,866,402	125,303,451	533,169,853
RES	2020	07	389,363,843	149,369,283	538,733,126	284,394,741	92,799,926	377,194,667	117,409,000	36,051,917	153,460,917	499,311,839	154,466,262	653,778,101
RES	2020	08	454,136,910	171,377,073	625,513,983	324,633,425	104,908,089	429,541,514	131,964,652	40,121,383	172,086,035	577,380,375	176,789,970	754,170,345
RES	2020	09	394,092,343	147,249,630	541,341,973	287,280,987	91,938,273	379,219,260	115,721,749	34,668,576	150,390,325	509,620,303	153,737,619	663,357,922
RES	2020	10	277,119,673	99,366,822	371,486,495	221,645,622	70,232,088	291,877,710	88,235,852	26,147,408	114,383,260	383,814,568	113,421,135	497,235,703
RES	2020	11	268,006,792	95,839,871	363,846,663	268,611,243	70,535,512	339,146,755	86,469,221	25,180,124	111,649,345	365,425,757	105,700,474	471,126,231
RES	2020	12	344,146,490	121,412,325	465,558,815	241,290,206	86,281,134	327,571,340	107,568,087	31,099,827	138,667,914	464,568,832	130,972,757	595,541,589
RES	2021	01	454,159,476	155,445,034	609,604,510	350,654,308	104,648,938	455,303,246	135,834,063	38,341,900	174,175,963	596,896,128	163,147,850	760,043,978
RES	2021	02	433,553,908	145,398,228	578,952,136	330,220,783	97,097,113	427,317,896	132,773,472	36,802,089	169,575,561	585,852,491	156,918,210	742,770,701
RES	2021	03	418,596,598	138,880,305	557,476,903	321,278,371	91,589,354	412,867,725	121,388,578	33,000,544	154,389,122	531,083,824	141,298,561	672,382,385
RES	2021	04	320,824,962	106,574,480	427,399,442	257,557,798	74,192,936	331,750,734	90,527,282	24,326,348	114,853,630	395,749,520	103,062,487	498,812,007
RES	2021	05	276,302,576	91,263,977	367,566,553	233,694,140	66,094,761	299,788,901	88,884,009	23,582,313	112,466,322	381,915,728	99,720,196	481,635,924
RES	2021	06	316,089,191	104,964,715	421,053,906	246,711,603	69,809,293	316,520,896	99,867,462	26,320,304	126,187,766	419,647,891	111,488,536	531,136,427
RES	2021	07	406,753,504	133,832,730	540,586,234	297,369,225	83,381,744	380,750,969	118,279,533	30,907,546	149,187,079	510,554,298	134,695,539	645,249,837
RES	2021	08	423,124,508	137,402,480	560,526,988	305,314,932	84,421,239	389,736,171	119,574,279	30,886,034	150,460,313	525,553,374	136,465,616	662,018,990
RES	2021	09	421,834,367	135,515,537	557,349,904	315,375,682	87,061,499	402,437,181	120,722,104	30,970,209	151,692,313	520,979,737	134,467,823	655,447,560

	Year	Month	ME kWh			PN kWh			PP kWh			WP kWh		
			Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential	Default Service	Shopping	Total Residential
RES	2021	10	301,660,257	95,544,997	397,205,254	237,207,068	64,059,816	301,266,884	92,144,986	23,111,565	115,256,551	399,067,801	100,395,707	499,463,508
RES	2021	11	287,839,891	89,493,511	377,333,402	246,293,807	64,543,684	310,837,491	86,906,056	21,545,339	108,451,395	372,374,121	92,198,096	464,572,217
RES	2021	12	369,896,036	111,554,713	481,450,749	299,020,551	76,989,638	376,010,189	113,196,230	27,387,877	140,584,107	493,229,568	117,110,665	610,340,233

ME Residential			
YearMonth	Default Service Charges	Generation Supplier Charges	Total Generation Supply Charge
201501	\$ 23,809,581		
201502	\$ 27,199,591		
201503	\$ 28,576,357		
201504	\$ 23,221,878		
201505	\$ 18,222,633		
201506	\$ 20,532,147		
201507	\$ 23,052,361		
201508	\$ 25,326,680		
201509	\$ 23,482,986		
201510	\$ 17,073,918		
201511	\$ 16,421,436		
201512	\$ 21,090,635		
201601	\$ 25,844,471		
201602	\$ 28,938,541		
201603	\$ 22,263,252		
201604	\$ 16,950,781		
201605	\$ 14,017,794		
201606	\$ 16,428,091		
201607	\$ 18,418,521		
201608	\$ 20,936,343		
201609	\$ 21,110,925		
201610	\$ 16,056,687		
201611	\$ 15,453,341		
201612	\$ 19,524,429		
201701	\$ 25,619,635		
201702	\$ 23,429,579		
201703	\$ 19,622,692		
201704	\$ 17,185,094		
201705	\$ 14,799,856		
201706	\$ 14,969,336		
201707	\$ 18,131,749		
201708	\$ 18,506,834	\$ 14,276,598	\$ 32,783,432
201709	\$ 15,031,310	\$ 11,337,670	\$ 26,368,980
201710	\$ 14,451,808	\$ 10,989,264	\$ 25,441,072
201711	\$ 13,188,536	\$ 9,516,767	\$ 22,705,303
201712	\$ 18,829,471	\$ 12,647,293	\$ 31,476,764
201801	\$ 26,890,851	\$ 17,000,699	\$ 43,891,550
201802	\$ 23,727,919	\$ 14,361,450	\$ 38,089,369
201803	\$ 19,720,332	\$ 12,192,983	\$ 31,913,315
201804	\$ 17,562,184	\$ 10,821,163	\$ 28,383,347
201805	\$ 14,583,056	\$ 10,424,147	\$ 25,007,203
201806	\$ 15,919,687	\$ 10,496,333	\$ 26,416,020
201807	\$ 20,573,061	\$ 13,136,244	\$ 33,709,305
201808	\$ 21,709,190	\$ 13,544,614	\$ 35,253,804
201809	\$ 21,467,053	\$ 13,328,514	\$ 34,795,567
201810	\$ 15,374,335	\$ 9,761,069	\$ 25,135,404
201811	\$ 15,110,032	\$ 9,356,309	\$ 24,466,341
201812	\$ 21,014,410	\$ 12,070,714	\$ 33,085,124
201901	\$ 25,211,397	\$ 14,016,237	\$ 39,227,634
201902	\$ 25,945,754	\$ 13,881,661	\$ 39,827,415
201903	\$ 22,997,336	\$ 12,426,485	\$ 35,423,821
201904	\$ 17,676,944	\$ 10,027,598	\$ 27,704,542
201905	\$ 14,221,464	\$ 8,359,200	\$ 22,580,664
201906	\$ 15,181,354	\$ 9,405,632	\$ 24,586,986
201907	\$ 18,383,749	\$ 11,985,767	\$ 30,369,516
201908	\$ 21,512,787	\$ 13,864,566	\$ 35,377,353
201909	\$ 18,039,598	\$ 11,238,785	\$ 29,278,383
201910	\$ 14,588,652	\$ 8,872,783	\$ 23,461,435
201911	\$ 14,427,940	\$ 8,553,833	\$ 22,981,773
201912	\$ 19,877,401	\$ 10,740,557	\$ 30,617,958
202001	\$ 24,327,496	\$ 12,227,537	\$ 36,555,033
202002	\$ 22,876,934	\$ 11,340,853	\$ 34,217,787
202003	\$ 20,430,058	\$ 10,188,156	\$ 30,618,214
202004	\$ 15,478,867	\$ 9,638,034	\$ 25,116,901
202005	\$ 14,945,961	\$ 8,824,824	\$ 23,770,785
202006	\$ 15,357,316	\$ 9,194,981	\$ 24,552,297
202007	\$ 19,707,277	\$ 11,829,869	\$ 31,537,146
202008	\$ 22,987,177	\$ 13,544,878	\$ 36,532,055
202009	\$ 20,401,876	\$ 11,564,055	\$ 31,965,931
202010	\$ 14,771,345	\$ 7,919,501	\$ 22,690,846
202011	\$ 14,560,532	\$ 7,694,017	\$ 22,254,549
202012	\$ 19,151,410	\$ 9,659,593	\$ 28,811,003
202101	\$ 26,445,255	\$ 12,520,497	\$ 38,965,752
202102	\$ 25,299,298	\$ 11,777,475	\$ 37,076,773
202103	\$ 23,427,599	\$ 11,196,408	\$ 34,624,007
202104	\$ 16,461,244	\$ 8,735,333	\$ 25,196,577
202105	\$ 14,134,038	\$ 7,607,906	\$ 21,741,944
202106	\$ 17,538,348	\$ 8,833,270	\$ 26,371,618
202107	\$ 25,618,872	\$ 11,433,712	\$ 37,052,584
202108	\$ 26,732,101	\$ 11,868,881	\$ 38,600,982
202109	\$ 27,193,202	\$ 11,841,962	\$ 39,035,164
202110	\$ 20,251,197	\$ 8,546,165	\$ 28,797,362
202111	\$ 19,338,665	\$ 8,236,592	\$ 27,575,257
202112	\$ 25,217,395	\$ 10,512,085	\$ 35,729,480

PN Residential			
YearMonth	Default Service Charges	Generation Supplier Charges	Total Generation Supply Charges
201501	\$ 16,767,104		
201502	\$ 18,386,510		
201503	\$ 18,973,425		
201504	\$ 16,075,670		
201505	\$ 13,042,347		
201506	\$ 13,643,216		
201507	\$ 15,194,534		
201508	\$ 16,023,108		
201509	\$ 16,130,147		
201510	\$ 15,367,663		
201511	\$ 15,342,264		
201512	\$ 17,663,037		
201601	\$ 20,169,321		
201602	\$ 21,143,693		
201603	\$ 16,882,341		
201604	\$ 13,467,832		
201605	\$ 11,607,724		
201606	\$ 12,406,197		
201607	\$ 13,709,398		
201608	\$ 15,927,141		
201609	\$ 16,734,439		
201610	\$ 15,068,499		
201611	\$ 14,958,123		
201612	\$ 17,898,539		
201701	\$ 20,370,393		
201702	\$ 18,658,766		
201703	\$ 14,853,463		
201704	\$ 12,598,763		
201705	\$ 10,863,574		
201706	\$ 13,987,807		
201707	\$ 11,204,310		
201708	\$ 14,344,311	\$ 8,822,734	\$ 23,167,045
201709	\$ 11,782,487	\$ 7,557,645	\$ 19,340,132
201710	\$ 10,378,648	\$ 7,340,658	\$ 17,719,306
201711	\$ 10,946,239	\$ 7,265,949	\$ 18,212,188
201712	\$ 15,082,877	\$ 8,807,381	\$ 23,890,258
201801	\$ 21,331,252	\$ 11,288,594	\$ 32,619,846
201802	\$ 18,725,589	\$ 9,594,287	\$ 28,319,876
201803	\$ 15,687,009	\$ 8,465,343	\$ 24,152,352
201804	\$ 14,156,469	\$ 7,677,505	\$ 21,833,974
201805	\$ 11,741,167	\$ 7,401,921	\$ 19,143,088
201806	\$ 12,574,244	\$ 7,198,568	\$ 19,772,812
201807	\$ 15,222,877	\$ 8,326,677	\$ 23,549,554
201808	\$ 15,731,898	\$ 8,412,516	\$ 24,144,414
201809	\$ 16,062,135	\$ 8,561,503	\$ 24,623,638
201810	\$ 12,538,277	\$ 6,819,731	\$ 19,358,008
201811	\$ 13,214,977	\$ 7,031,104	\$ 20,246,081
201812	\$ 16,874,729	\$ 8,461,233	\$ 25,335,962
201901	\$ 18,869,371	\$ 9,501,225	\$ 28,370,596
201902	\$ 19,090,743	\$ 9,224,247	\$ 28,314,990
201903	\$ 16,953,394	\$ 8,419,709	\$ 25,373,103
201904	\$ 13,474,439	\$ 7,067,286	\$ 20,541,725
201905	\$ 11,406,273	\$ 6,080,110	\$ 17,486,383
201906	\$ 11,145,608	\$ 5,969,111	\$ 17,114,719
201907	\$ 13,688,749	\$ 7,287,650	\$ 20,976,399
201908	\$ 15,544,719	\$ 8,182,282	\$ 23,727,001
201909	\$ 13,017,386	\$ 6,915,048	\$ 19,932,434
201910	\$ 10,851,252	\$ 6,050,561	\$ 16,901,813
201911	\$ 11,436,160	\$ 6,226,653	\$ 17,662,813
201912	\$ 15,155,120	\$ 7,403,827	\$ 22,558,947
202001	\$ 18,636,321	\$ 8,110,097	\$ 26,746,418
202002	\$ 17,701,397	\$ 7,637,745	\$ 25,339,142
202003	\$ 16,297,361	\$ 7,098,716	\$ 23,396,077
202004	\$ 12,732,177	\$ 6,731,614	\$ 19,463,791
202005	\$ 12,455,746	\$ 6,275,883	\$ 18,731,629
202006	\$ 12,296,461	\$ 6,204,619	\$ 18,501,080
202007	\$ 14,713,783	\$ 7,331,026	\$ 22,044,809
202008	\$ 16,784,480	\$ 8,286,298	\$ 25,070,778
202009	\$ 14,907,312	\$ 7,219,310	\$ 22,126,622
202010	\$ 11,587,499	\$ 5,592,926	\$ 17,180,425
202011	\$ 14,070,960	\$ 5,669,959	\$ 19,740,919
202012	\$ 12,687,271	\$ 6,863,513	\$ 19,550,784
202101	\$ 18,597,444	\$ 8,521,160	\$ 27,118,604
202102	\$ 17,505,891	\$ 8,077,143	\$ 25,583,034
202103	\$ 16,325,221	\$ 7,491,874	\$ 23,817,095
202104	\$ 12,009,382	\$ 6,180,628	\$ 18,190,010
202105	\$ 10,876,025	\$ 5,594,164	\$ 16,470,189
202106	\$ 12,694,398	\$ 6,001,107	\$ 18,695,505
202107	\$ 17,915,883	\$ 7,293,623	\$ 25,209,506
202108	\$ 18,459,849	\$ 7,458,106	\$ 25,917,955
202109	\$ 19,333,038	\$ 7,770,428	\$ 27,103,466
202110	\$ 14,980,183	\$ 5,889,906	\$ 20,870,089
202111	\$ 15,569,236	\$ 6,121,045	\$ 21,690,281
202112	\$ 18,704,181	\$ 7,508,995	\$ 26,213,176

PP Residential			
YearMonth	Default Service Charges	Generation Supplier Charges	Total Generation Supply Charges
201501	\$ 6,896,417		
201502	\$ 7,148,735		
201503	\$ 7,277,977		
201504	\$ 5,507,001		
201505	\$ 4,455,944		
201506	\$ 6,161,615		
201507	\$ 8,505,747		
201508	\$ 9,476,958		
201509	\$ 9,301,188		
201510	\$ 7,461,345		
201511	\$ 7,392,557		
201512	\$ 8,783,332		
201601	\$ 10,855,067		
201602	\$ 11,068,666		
201603	\$ 9,320,641		
201604	\$ 6,891,294		
201605	\$ 5,612,048		
201606	\$ 6,137,407		
201607	\$ 6,772,538		
201608	\$ 7,869,399		
201609	\$ 7,838,065		
201610	\$ 6,615,152		
201611	\$ 5,866,731		
201612	\$ 7,855,387		
201701	\$ 9,266,722		
201702	\$ 8,040,800		
201703	\$ 6,369,370		
201704	\$ 4,846,033		
201705	\$ 3,917,652		
201706	\$ 4,764,087		
201707	\$ 6,386,841		
201708	\$ 6,279,344	\$ 3,288,413	\$ 9,567,757
201709	\$ 5,182,786	\$ 2,752,933	\$ 7,935,719
201710	\$ 4,667,782	\$ 2,647,689	\$ 7,315,471
201711	\$ 4,662,799	\$ 2,561,312	\$ 7,224,111
201712	\$ 6,939,766	\$ 3,406,281	\$ 10,346,047
201801	\$ 10,154,822	\$ 4,459,425	\$ 14,614,247
201802	\$ 8,292,351	\$ 3,560,319	\$ 11,852,670
201803	\$ 6,862,957	\$ 2,995,038	\$ 9,857,995
201804	\$ 6,329,629	\$ 2,734,108	\$ 9,063,737
201805	\$ 5,078,405	\$ 2,661,700	\$ 7,740,105
201806	\$ 6,114,463	\$ 2,930,523	\$ 9,044,986
201807	\$ 7,179,371	\$ 3,302,847	\$ 10,482,218
201808	\$ 7,107,609	\$ 3,293,461	\$ 10,401,070
201809	\$ 7,095,570	\$ 3,256,014	\$ 10,351,584
201810	\$ 5,514,222	\$ 2,555,478	\$ 8,069,700
201811	\$ 5,608,380	\$ 2,525,441	\$ 8,133,821
201812	\$ 7,720,169	\$ 3,221,000	\$ 10,941,169
201901	\$ 9,169,275	\$ 3,537,460	\$ 12,706,735
201902	\$ 9,874,362	\$ 3,696,465	\$ 13,570,827
201903	\$ 7,892,322	\$ 3,167,068	\$ 11,059,390
201904	\$ 5,736,166	\$ 2,618,918	\$ 8,355,084
201905	\$ 4,707,123	\$ 2,213,359	\$ 6,920,482
201906	\$ 5,025,621	\$ 2,398,937	\$ 7,424,558
201907	\$ 6,477,815	\$ 3,112,638	\$ 9,590,453
201908	\$ 7,081,190	\$ 3,371,505	\$ 10,452,695
201909	\$ 6,050,200	\$ 2,839,146	\$ 8,889,346
201910	\$ 5,009,974	\$ 2,364,999	\$ 7,374,973
201911	\$ 4,975,077	\$ 2,293,690	\$ 7,268,767
201912	\$ 7,092,187	\$ 2,962,272	\$ 10,054,459
202001	\$ 8,807,837	\$ 3,250,551	\$ 12,058,388
202002	\$ 7,927,772	\$ 2,909,319	\$ 10,837,091
202003	\$ 7,326,731	\$ 2,841,513	\$ 10,168,244
202004	\$ 5,549,964	\$ 2,505,422	\$ 8,055,386
202005	\$ 5,471,524	\$ 2,468,420	\$ 7,939,944
202006	\$ 5,806,103	\$ 2,601,271	\$ 8,407,374
202007	\$ 7,395,255	\$ 3,207,630	\$ 10,602,885
202008	\$ 8,321,350	\$ 3,581,457	\$ 11,902,807
202009	\$ 7,229,065	\$ 3,077,257	\$ 10,306,322
202010	\$ 5,374,059	\$ 2,326,881	\$ 7,700,940
202011	\$ 5,258,094	\$ 2,246,470	\$ 7,504,564
202012	\$ 6,540,359	\$ 2,749,280	\$ 9,289,639
202101	\$ 8,248,430	\$ 3,382,027	\$ 11,630,457
202102	\$ 8,071,728	\$ 3,216,007	\$ 11,287,735
202103	\$ 7,095,765	\$ 2,872,564	\$ 9,968,329
202104	\$ 4,900,522	\$ 2,184,155	\$ 7,084,677
202105	\$ 4,799,763	\$ 2,145,723	\$ 6,945,486
202106	\$ 5,881,043	\$ 2,458,845	\$ 8,339,888
202107	\$ 7,994,713	\$ 2,929,142	\$ 10,923,855
202108	\$ 8,119,789	\$ 2,961,176	\$ 11,080,965
202109	\$ 8,372,792	\$ 2,943,734	\$ 11,316,526
202110	\$ 6,650,793	\$ 2,262,174	\$ 8,912,967
202111	\$ 6,284,224	\$ 2,141,043	\$ 8,425,267
202112	\$ 8,166,437	\$ 2,765,859	\$ 10,932,296

WP Residential			
YearMonth	Default Service Charges	Generation Supplier Charges	Total Generation Supply Charges
201501	\$ 35,927,013		
201502	\$ 35,182,792		
201503	\$ 23,021,459		
201504	\$ 17,249,331		
201505	\$ 19,356,321		
201506	\$ 29,047,038		
201507	\$ 32,424,667		
201508	\$ 30,806,370		
201509	\$ 26,359,594		
201510	\$ 22,824,391		
201511	\$ 23,701,417		
201512	\$ 28,890,460		
201601	\$ 35,980,303		
201602	\$ 32,358,617		
201603	\$ 24,832,330		
201604	\$ 23,352,916		
201605	\$ 22,020,162		
201606	\$ 24,474,510		
201607	\$ 30,269,337		
201608	\$ 31,797,280		
201609	\$ 22,310,296		
201610	\$ 18,196,826		
201611	\$ 22,366,501		
201612	\$ 31,688,627		
201701	\$ 30,748,864		
201702	\$ 25,059,251		
201703	\$ 25,240,788		
201704	\$ 16,711,239		
201705	\$ 18,662,741		
201706	\$ 23,866,387		
201707	\$ 29,365,131		
201708	\$ 25,966,276	\$ 12,747,535	\$ 38,713,811
201709	\$ 20,455,963	\$ 10,921,565	\$ 31,377,528
201710	\$ 20,550,274	\$ 10,561,417	\$ 31,111,691
201711	\$ 23,713,504	\$ 9,920,652	\$ 33,634,156
201712	\$ 32,252,507	\$ 13,274,695	\$ 45,527,202
201801	\$ 36,550,643	\$ 18,089,703	\$ 54,640,346
201802	\$ 29,579,460	\$ 13,781,970	\$ 43,361,430
201803	\$ 25,797,532	\$ 12,150,770	\$ 37,948,302
201804	\$ 24,752,866	\$ 10,979,412	\$ 35,732,278
201805	\$ 19,895,815	\$ 10,459,650	\$ 30,355,465
201806	\$ 24,642,874	\$ 11,704,273	\$ 36,347,147
201807	\$ 29,252,160	\$ 13,207,822	\$ 42,459,982
201808	\$ 28,540,631	\$ 12,590,979	\$ 41,131,610
201809	\$ 27,839,051	\$ 12,888,559	\$ 40,727,610
201810	\$ 20,171,329	\$ 10,259,627	\$ 30,430,956
201811	\$ 20,265,630	\$ 10,039,694	\$ 30,305,324
201812	\$ 27,536,792	\$ 12,591,967	\$ 40,128,759
201901	\$ 32,614,035	\$ 14,399,452	\$ 47,013,487
201902	\$ 34,939,704	\$ 14,597,197	\$ 49,536,901
201903	\$ 29,412,077	\$ 12,478,169	\$ 41,890,246
201904	\$ 23,148,771	\$ 10,175,587	\$ 33,324,358
201905	\$ 18,781,461	\$ 8,516,846	\$ 27,298,307
201906	\$ 20,375,641	\$ 9,711,438	\$ 30,087,079
201907	\$ 24,277,725	\$ 12,096,674	\$ 36,374,399
201908	\$ 26,925,317	\$ 13,214,451	\$ 40,139,768
201909	\$ 23,419,865	\$ 11,289,853	\$ 34,709,718
201910	\$ 18,768,412	\$ 9,197,425	\$ 27,965,837
201911	\$ 18,295,417	\$ 8,718,942	\$ 27,014,359
201912	\$ 25,021,381	\$ 11,249,448	\$ 36,270,829
202001	\$ 29,166,037	\$ 12,578,212	\$ 41,744,249
202002	\$ 26,159,375	\$ 11,153,807	\$ 37,313,182
202003	\$ 25,098,663	\$ 10,634,879	\$ 35,733,542
202004	\$ 21,073,780	\$ 9,313,170	\$ 30,386,950
202005	\$ 21,034,511	\$ 9,159,376	\$ 30,193,887
202006	\$ 21,086,425	\$ 9,636,210	\$ 30,722,635
202007	\$ 24,175,947	\$ 11,873,503	\$ 36,049,450
202008	\$ 27,891,260	\$ 13,524,861	\$ 41,416,121
202009	\$ 24,345,202	\$ 11,632,305	\$ 35,977,507
202010	\$ 17,738,627	\$ 8,656,472	\$ 26,395,099
202011	\$ 16,851,451	\$ 8,124,909	\$ 24,976,360
202012	\$ 21,906,808	\$ 9,966,469	\$ 31,873,277
202101	\$ 29,229,150	\$ 12,831,980	\$ 42,061,130
202102	\$ 28,752,000	\$ 12,436,789	\$ 41,188,789
202103	\$ 25,982,230	\$ 11,234,833	\$ 37,217,063
202104	\$ 19,242,963	\$ 8,402,135	\$ 27,645,098
202105	\$ 18,552,913	\$ 8,300,247	\$ 26,853,160
202106	\$ 21,131,201	\$ 9,399,568	\$ 30,530,769
202107	\$ 27,398,470	\$ 11,474,268	\$ 38,872,738
202108	\$ 28,274,594	\$ 11,728,707	\$ 40,003,301
202109	\$ 27,669,210	\$ 11,590,741	\$ 39,259,951
202110	\$ 20,522,518	\$ 8,872,926	\$ 29,395,444
202111	\$ 19,117,174	\$ 8,318,240	\$ 27,435,414
202112	\$ 25,681,922	\$ 10,792,207	\$ 36,474,129

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 2

Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 2**

“In a live Excel spreadsheet, please provide the following for January
2015 to date, disaggregated by month and by year:

- (a) The total number of residential shopping customers.
- (b) The total usage of residential shopping customers.
- (c) The total amount billed for generation supply charges
for residential shopping customers.”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 1.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 4

Witness: P. M. Larkin

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 4**

“In a live Excel spreadsheet, please provide the applicable price to compare
for January 2015 to date, disaggregated by month and by year.”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 4, Attachment A.
The price to compare for the requested period is provided by quarter and by year.

Residential Price to Compare
 \$ Per KWH

PTC Period beginning:	Met-Ed	Penelec	Penn Power	West Penn
1/1/2015	0.07007	0.06370	0.05419	0.06312
3/1/2015	0.07923	0.06943	0.05754	0.05330
6/1/2015	0.07842	0.07343	0.08585	0.07312
9/1/2015	0.07246	0.07341	0.09198	0.06917
12/1/2015	0.08306	0.07554	0.08996	0.07011
3/1/2016	0.07071	0.06516	0.07878	0.06983
6/1/2016	0.05945	0.06019	0.06819	0.06411
9/1/2016	0.06902	0.07724	0.07978	0.06061
12/1/2016	0.07351	0.07121	0.07727	0.06574
3/1/2017	0.06964	0.06047	0.05884	0.05975
6/1/2017	0.06018	0.06158	0.06741	0.06597
9/1/2017	0.05995	0.05383	0.05956	0.06289
12/1/2017	0.06816	0.06742	0.07202	0.06149
3/1/2018	0.06181	0.05878	0.06599	0.06085
6/1/2018	0.06341	0.06223	0.06824	0.06560
9/1/2018	0.06068	0.05968	0.06626	0.05595
12/1/2018	0.06684	0.06288	0.07714	0.06354
3/1/2019	0.06241	0.05747	0.06414	0.06092
6/1/2019	0.05540	0.05668	0.06256	0.05517
9/1/2019	0.05667	0.05198	0.06231	0.05338
12/1/2019	0.06510	0.06445	0.07572	0.05760
3/1/2020	0.05390	0.05404	0.06267	0.05637
6/1/2020	0.05361	0.05532	0.06684	0.05125
9/1/2020	0.05757	0.05598	0.06447	0.04891
12/1/2020	0.06174	0.05667	0.06435	0.05198
3/1/2021	0.05418	0.04981	0.05721	0.05154
6/1/2021	0.06690	0.06462	0.07195	0.05707
9/1/2021	0.07114	0.06761	0.07657	0.05447
12/1/2021	0.07414	0.06507	0.07593	0.05698

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 7**

“In a live Excel spreadsheet, please provide the following for January 2015 to date, disaggregated by month and by year:

- (a) The total number of residential non-PCAP CLI shopping customers.
- (b) The total usage of residential non-PCAP CLI shopping customers.
- (c) The total amount billed for generation supply charges for non-PCAP CLI shopping customers.”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 007, Attachment A. The Companies do not track historical confirmed low-income customers at an account number level. Therefore, data provided in Attachment A is reflected for customers as of a point in time with the residential, non-PCAP, confirmed low-income, and shopping indicators as of 12/31/2021 and is provided for the month of December 2021 for parts (b) and (c).

**Non-PCAP, CLI and Shopping Indicators
as of 12/31/2021**

OpCo	Res Non-PCAP		
	# of Customers (Part a)	CLI Shopping Usage kWh in Dec 2021 (Part b)	Total Amount Billed in Dec 2021 (Part c)
ME	7,029	7,024,687	\$ 849,484
PN	7,684	6,097,321	\$ 766,213
PP	1,669	1,508,919	\$ 191,625
WP	6,163	6,415,741	\$ 739,710

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 10

Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 10**

“In a live Excel spreadsheet, please provide the following for January 2015 to date, disaggregated by month and by year:

- (a) The total number of PCAP shopping customers
- (b) The total usage of PCAP shopping customers
- (c) The total amount billed for generation supply charges for PCAP shopping customers before PCAP credit was applied.”

RESPONSE:

The Companies did not track the information requested in subpart (a) of this interrogatory prior to 2017. See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 10, Attachment A for the total number of PCAP shopping customers from January 2017 to date.

The data requested in subparts (b) and (c) of this interrogatory prior to July 2017 is not available. See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 10, Attachment B for the data requested in subparts (b) and (c) from July 2017 to date.

(a) MET-ED (ME) PCAP Shopping Customers													
OpCo	Year	Jan	Feb	March	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
ME	2017	4,483	5,356	6,066	4,643	4,701	4,633	4,694	4,578	4,551	4,531	4,440	4,252
ME	2018	4,240	4,177	3,965	4,108	4,103	3,991	3,952	3,910	3,783	3,734	3,688	3,627
ME	2019	3,609	3,491	3,518	3,409	3,277	2,328	2,016	1,869	1,687	1,639	1,551	1,484
ME	2020	1,506	1,521	1,533	1,608	1,672	1,758	1,784	1,725	1,735	1,831	1,836	1,823
ME	2021	1,836	1,828	1,821	1,764	1,667	1,594	1,560	1,531	1,451	1,509	1,530	1,559
(a) PENELEC (PN) PCAP Shopping Customers													
PN	2017	5,721	6,969	8,049	5,983	6,013	5,777	5,755	5,685	5,572	5,445	5,398	5,210
PN	2018	5,192	5,170	4,962	5,179	5,110	4,977	4,685	4,733	4,610	4,546	4,500	4,511
PN	2019	4,415	4,268	4,286	4,189	3,977	3,026	2,633	2,502	2,259	2,167	2,057	2,027
PN	2020	2,046	2,045	2,063	2,151	2,193	2,277	2,349	2,257	2,271	2,383	2,316	2,392
PN	2021	2,423	2,369	2,346	2,232	2,154	2,102	2,051	2,013	1,832	1,883	1,947	1,953
(a) PENN POWER (PP) PCAP Shopping Customers													
PP	2017	1,107	1,378	2,117	1,168	1,191	1,173	1,139	1,145	1,128	1,093	1,065	1,017
PP	2018	1,022	1,017	967	978	985	973	938	927	926	933	943	935
PP	2019	921	903	893	871	829	631	541	505	448	438	432	413
PP	2020	409	398	408	431	427	459	456	451	447	453	447	440
PP	2021	451	452	439	437	420	407	380	367	345	356	379	380
(a) WEST PENN POWER (WP) PCAP Shopping Customers													
WP	2017	7,736	9,301	10,586	8,217	8,341	8,220	8,131	7,913	7,800	7,745	7,590	7,274
WP	2018	7,272	6,929	6,444	6,369	6,154	5,837	5,342	5,135	4,904	4,746	4,597	4,541
WP	2019	4,433	4,211	4,268	4,148	3,992	2,883	2,518	2,289	2,035	1,968	1,857	1,836
WP	2020	1,825	1,802	1,798	1,889	1,998	2,111	2,160	2,075	2,041	2,105	2,086	2,130
WP	2021	2,149	2,096	2,074	2,034	1,930	1,865	1,809	1,767	1,597	1,628	1,631	1,643

Note: The data was not tracked in 2015 and 2016.

Analysis of PCAP Shopping Customers
 July 2017-December 2021

Operating Company	Date	Shopping Generation			Operating Company	Date	Shopping Generation		
		PCAP Customer Shopping Count	Shopping PCAP kWh Usage	Charges (before PCAP Credit)			PCAP Customer Shopping Count	Shopping PCAP kWh Usage	Charges (before PCAP Credit)
Met-Ed	Jul-17	4,694	4,414,950	\$ 326,238	Penelec	Jul-17	5,755	3,878,221	\$ 294,442
Met-Ed	Aug-17	4,578	4,494,626	\$ 333,735	Penelec	Aug-17	5,685	3,966,078	\$ 299,676
Met-Ed	Sep-17	4,551	3,715,391	\$ 281,054	Penelec	Sep-17	5,572	3,463,964	\$ 265,247
Met-Ed	Oct-17	4,531	3,487,985	\$ 266,581	Penelec	Oct-17	5,445	3,266,591	\$ 256,662
Met-Ed	Nov-17	4,440	3,509,744	\$ 273,794	Penelec	Nov-17	5,398	3,682,854	\$ 285,392
Met-Ed	Dec-17	4,252	4,868,278	\$ 378,695	Penelec	Dec-17	5,210	4,530,125	\$ 347,775
Met-Ed	Jan-18	4,240	6,661,835	\$ 511,531	Penelec	Jan-18	5,192	5,842,929	\$ 450,215
Met-Ed	Feb-18	4,177	5,648,566	\$ 435,961	Penelec	Feb-18	5,170	5,032,062	\$ 390,243
Met-Ed	Mar-18	3,965	4,394,908	\$ 357,268	Penelec	Mar-18	4,962	4,231,893	\$ 339,487
Met-Ed	Apr-18	4,108	4,461,923	\$ 351,140	Penelec	Apr-18	5,179	4,398,734	\$ 331,686
Met-Ed	May-18	4,103	3,402,086	\$ 272,298	Penelec	May-18	5,110	3,301,405	\$ 254,464
Met-Ed	Jun-18	3,991	3,132,001	\$ 251,395	Penelec	Jun-18	4,977	3,091,675	\$ 242,842
Met-Ed	Jul-18	3,952	3,743,639	\$ 300,661	Penelec	Jul-18	4,685	3,272,704	\$ 256,792
Met-Ed	Aug-18	3,910	3,925,431	\$ 308,999	Penelec	Aug-18	4,733	3,381,877	\$ 264,972
Met-Ed	Sep-18	3,783	3,690,199	\$ 297,059	Penelec	Sep-18	4,610	3,336,615	\$ 264,392
Met-Ed	Oct-18	3,734	2,836,733	\$ 224,977	Penelec	Oct-18	4,546	2,770,717	\$ 218,613
Met-Ed	Nov-18	3,688	3,174,084	\$ 242,053	Penelec	Nov-18	4,500	3,258,155	\$ 253,109
Met-Ed	Dec-18	3,627	4,522,322	\$ 345,976	Penelec	Dec-18	4,511	4,150,882	\$ 323,161
Met-Ed	Jan-19	3,609	5,102,085	\$ 376,879	Penelec	Jan-19	4,415	4,248,311	\$ 329,642
Met-Ed	Feb-19	3,491	4,927,667	\$ 383,428	Penelec	Feb-19	4,268	4,196,424	\$ 338,459
Met-Ed	Mar-19	3,518	4,569,189	\$ 347,884	Penelec	Mar-19	4,286	3,915,548	\$ 306,496
Met-Ed	Apr-19	3,409	3,382,977	\$ 265,023	Penelec	Apr-19	4,189	3,168,446	\$ 252,465
Met-Ed	May-19	3,277	2,674,434	\$ 194,794	Penelec	May-19	3,977	2,593,144	\$ 198,322
Met-Ed	Jun-19	2,328	1,726,170	\$ 128,954	Penelec	Jun-19	3,026	1,689,862	\$ 128,693
Met-Ed	Jul-19	2,016	1,882,630	\$ 148,079	Penelec	Jul-19	2,633	1,763,455	\$ 137,466
Met-Ed	Aug-19	1,869	2,044,633	\$ 157,311	Penelec	Aug-19	2,502	1,905,149	\$ 143,669
Met-Ed	Sep-19	1,687	1,515,085	\$ 123,083	Penelec	Sep-19	2,259	1,449,896	\$ 111,371
Met-Ed	Oct-19	1,639	1,211,773	\$ 95,964	Penelec	Oct-19	2,167	1,305,120	\$ 98,864
Met-Ed	Nov-19	1,551	1,270,141	\$ 98,858	Penelec	Nov-19	2,057	1,471,527	\$ 111,948
Met-Ed	Dec-19	1,484	1,752,540	\$ 134,522	Penelec	Dec-19	2,027	1,789,213	\$ 135,888
Met-Ed	Jan-20	1,506	1,985,933	\$ 150,918	Penelec	Jan-20	2,046	1,926,359	\$ 145,187
Met-Ed	Feb-20	1,521	1,929,089	\$ 147,374	Penelec	Feb-20	2,045	1,879,719	\$ 142,863
Met-Ed	Mar-20	1,533	1,814,292	\$ 139,594	Penelec	Mar-20	2,063	1,832,822	\$ 138,409
Met-Ed	Apr-20	1,608	1,596,885	\$ 121,285	Penelec	Apr-20	2,151	1,622,014	\$ 122,246
Met-Ed	May-20	1,672	1,528,450	\$ 117,373	Penelec	May-20	2,193	1,563,367	\$ 117,273
Met-Ed	Jun-20	1,758	1,492,847	\$ 116,530	Penelec	Jun-20	2,277	1,440,987	\$ 109,556
Met-Ed	Jul-20	1,784	1,848,168	\$ 139,529	Penelec	Jul-20	2,349	1,727,822	\$ 126,720
Met-Ed	Aug-20	1,725	2,056,803	\$ 160,731	Penelec	Aug-20	2,257	1,852,564	\$ 140,761
Met-Ed	Sep-20	1,735	1,811,867	\$ 143,088	Penelec	Sep-20	2,271	1,642,250	\$ 125,206
Met-Ed	Oct-20	1,831	1,380,698	\$ 110,919	Penelec	Oct-20	2,383	1,425,261	\$ 110,505
Met-Ed	Nov-20	1,836	1,478,514	\$ 116,902	Penelec	Nov-20	2,316	1,535,221	\$ 120,596
Met-Ed	Dec-20	1,823	1,926,979	\$ 154,446	Penelec	Dec-20	2,392	1,988,420	\$ 156,290
Met-Ed	Jan-21	1,836	2,546,707	\$ 200,518	Penelec	Jan-21	2,423	2,535,347	\$ 196,070
Met-Ed	Feb-21	1,828	2,475,167	\$ 194,671	Penelec	Feb-21	2,369	2,347,759	\$ 183,194
Met-Ed	Mar-21	1,821	2,440,889	\$ 195,209	Penelec	Mar-21	2,346	2,263,538	\$ 176,181
Met-Ed	Apr-21	1,764	1,785,028	\$ 148,729	Penelec	Apr-21	2,232	1,635,223	\$ 136,022
Met-Ed	May-21	1,667	1,343,665	\$ 114,898	Penelec	May-21	2,154	1,391,724	\$ 117,995
Met-Ed	Jun-21	1,594	1,333,184	\$ 116,134	Penelec	Jun-21	2,102	1,367,408	\$ 118,517
Met-Ed	Jul-21	1,560	1,609,458	\$ 141,532	Penelec	Jul-21	2,051	1,564,302	\$ 136,733
Met-Ed	Aug-21	1,531	1,679,756	\$ 144,832	Penelec	Aug-21	2,013	1,578,110	\$ 136,020
Met-Ed	Sep-21	1,451	1,567,665	\$ 140,139	Penelec	Sep-21	1,832	1,437,738	\$ 129,748
Met-Ed	Oct-21	1,509	1,179,560	\$ 107,802	Penelec	Oct-21	1,883	1,126,752	\$ 107,517
Met-Ed	Nov-21	1,530	1,198,557	\$ 113,141	Penelec	Nov-21	1,947	1,313,206	\$ 127,886

Met-Ed					Penelec				
Operating Company	Date	PCAP Customer Shopping Count	Shopping PCAP kWh Usage	Shopping Generation Charges (before PCAP Credit)	Operating Company	Date	PCAP Customer Shopping Count	Shopping PCAP kWh Usage	Shopping Generation Charges (before PCAP Credit)
	Dec-21	1,559	1,736,734	\$ 167,483		Dec-21	1,953	1,661,339	\$ 169,800
Penn Power	Jul-17	1,139	905,199	\$ 72,624	West Penn	Jul-17	8,131	7,916,069	\$ 595,839
Penn Power	Aug-17	1,145	964,095	\$ 76,897	West Penn	Aug-17	7,913	7,689,152	\$ 580,598
Penn Power	Sep-17	1,128	816,277	\$ 66,635	West Penn	Sep-17	7,800	6,793,357	\$ 516,287
Penn Power	Oct-17	1,093	779,406	\$ 65,318	West Penn	Oct-17	7,745	6,459,608	\$ 493,247
Penn Power	Nov-17	1,065	810,235	\$ 67,343	West Penn	Nov-17	7,590	6,840,350	\$ 520,055
Penn Power	Dec-17	1,017	1,116,040	\$ 92,921	West Penn	Dec-17	7,274	9,460,507	\$ 722,259
Penn Power	Jan-18	1,022	1,442,617	\$ 117,442	West Penn	Jan-18	7,272	12,314,895	\$ 937,164
Penn Power	Feb-18	1,017	1,267,568	\$ 102,233	West Penn	Feb-18	6,929	9,523,328	\$ 723,489
Penn Power	Mar-18	967	981,308	\$ 84,070	West Penn	Mar-18	6,444	7,462,861	\$ 583,876
Penn Power	Apr-18	978	966,538	\$ 79,672	West Penn	Apr-18	6,369	7,183,580	\$ 561,506
Penn Power	May-18	985	750,955	\$ 62,983	West Penn	May-18	6,154	5,288,006	\$ 416,871
Penn Power	Jun-18	973	719,814	\$ 59,177	West Penn	Jun-18	5,837	5,459,192	\$ 431,210
Penn Power	Jul-18	938	755,076	\$ 61,026	West Penn	Jul-18	5,342	5,501,170	\$ 426,258
Penn Power	Aug-18	927	829,771	\$ 66,930	West Penn	Aug-18	5,135	5,176,875	\$ 388,173
Penn Power	Sep-18	926	815,382	\$ 64,679	West Penn	Sep-18	4,904	5,002,315	\$ 378,992
Penn Power	Oct-18	933	711,743	\$ 55,513	West Penn	Oct-18	4,746	3,979,208	\$ 293,499
Penn Power	Nov-18	943	786,301	\$ 63,071	West Penn	Nov-18	4,597	4,271,456	\$ 323,826
Penn Power	Dec-18	935	1,071,889	\$ 87,956	West Penn	Dec-18	4,541	6,023,146	\$ 450,649
Penn Power	Jan-19	921	1,096,163	\$ 85,146	West Penn	Jan-19	4,433	5,982,550	\$ 444,684
Penn Power	Feb-19	903	1,178,553	\$ 96,383	West Penn	Feb-19	4,211	6,100,836	\$ 467,374
Penn Power	Mar-19	893	981,227	\$ 83,166	West Penn	Mar-19	4,268	5,425,882	\$ 408,291
Penn Power	Apr-19	871	780,471	\$ 66,550	West Penn	Apr-19	4,148	4,071,273	\$ 319,479
Penn Power	May-19	829	627,914	\$ 51,260	West Penn	May-19	3,992	3,398,141	\$ 250,395
Penn Power	Jun-19	631	408,393	\$ 35,275	West Penn	Jun-19	2,883	2,204,731	\$ 166,833
Penn Power	Jul-19	541	427,733	\$ 37,315	West Penn	Jul-19	2,518	2,430,344	\$ 181,370
Penn Power	Aug-19	505	469,663	\$ 39,466	West Penn	Aug-19	2,289	2,417,066	\$ 179,730
Penn Power	Sep-19	448	354,934	\$ 30,626	West Penn	Sep-19	2,035	1,861,622	\$ 141,541
Penn Power	Oct-19	438	307,535	\$ 27,780	West Penn	Oct-19	1,968	1,516,616	\$ 115,924
Penn Power	Nov-19	432	341,255	\$ 30,875	West Penn	Nov-19	1,857	1,623,587	\$ 124,560
Penn Power	Dec-19	413	463,286	\$ 41,033	West Penn	Dec-19	1,836	2,204,706	\$ 166,324
Penn Power	Jan-20	409	499,519	\$ 43,871	West Penn	Jan-20	1,825	2,368,248	\$ 174,829
Penn Power	Feb-20	398	457,119	\$ 39,059	West Penn	Feb-20	1,802	2,156,052	\$ 161,017
Penn Power	Mar-20	408	461,748	\$ 39,177	West Penn	Mar-20	1,798	2,035,576	\$ 151,000
Penn Power	Apr-20	431	429,162	\$ 35,427	West Penn	Apr-20	1,889	1,772,341	\$ 132,926
Penn Power	May-20	427	399,428	\$ 33,543	West Penn	May-20	1,998	1,820,791	\$ 136,393
Penn Power	Jun-20	459	375,375	\$ 32,071	West Penn	Jun-20	2,111	1,829,344	\$ 137,824
Penn Power	Jul-20	456	411,761	\$ 35,913	West Penn	Jul-20	2,160	2,210,692	\$ 159,989
Penn Power	Aug-20	451	492,678	\$ 42,292	West Penn	Aug-20	2,075	2,445,481	\$ 181,157
Penn Power	Sep-20	447	432,022	\$ 38,002	West Penn	Sep-20	2,041	2,103,495	\$ 155,866
Penn Power	Oct-20	453	369,218	\$ 32,331	West Penn	Oct-20	2,105	1,727,648	\$ 128,430
Penn Power	Nov-20	447	365,597	\$ 31,852	West Penn	Nov-20	2,086	1,753,996	\$ 132,649
Penn Power	Dec-20	440	442,481	\$ 38,950	West Penn	Dec-20	2,130	2,281,899	\$ 170,703
Penn Power	Jan-21	451	581,212	\$ 49,700	West Penn	Jan-21	2,149	2,976,988	\$ 219,351
Penn Power	Feb-21	452	589,702	\$ 50,324	West Penn	Feb-21	2,096	2,859,113	\$ 212,612
Penn Power	Mar-21	439	545,242	\$ 46,943	West Penn	Mar-21	2,074	2,536,808	\$ 196,960
Penn Power	Apr-21	437	393,033	\$ 35,088	West Penn	Apr-21	2,034	1,800,091	\$ 147,472
Penn Power	May-21	420	340,088	\$ 31,774	West Penn	May-21	1,930	1,569,586	\$ 129,374
Penn Power	Jun-21	407	322,105	\$ 30,301	West Penn	Jun-21	1,865	1,563,033	\$ 132,019
Penn Power	Jul-21	380	333,082	\$ 31,919	West Penn	Jul-21	1,809	1,743,624	\$ 149,859
Penn Power	Aug-21	367	337,409	\$ 31,711	West Penn	Aug-21	1,767	1,769,000	\$ 151,289
Penn Power	Sep-21	345	301,063	\$ 29,573	West Penn	Sep-21	1,597	1,574,091	\$ 142,542
Penn Power	Oct-21	356	258,371	\$ 25,766	West Penn	Oct-21	1,628	1,265,036	\$ 117,782
Penn Power	Nov-21	379	276,408	\$ 27,167	West Penn	Nov-21	1,631	1,271,418	\$ 123,567
Penn Power	Dec-21	380	374,190	\$ 37,056	West Penn	Dec-21	1,643	1,728,429	\$ 171,580

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 11

Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 11**

“In a live Excel spreadsheet, please provide the following for January 2015 to date, disaggregated by month and by year:

- (a) The total number of PCAP default service customers
- (b) The total usage of PCAP default service customers
- (c) The total amount billed for generation supply charges for PCAP default service customers before PCAP credit was applied.”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 11, Attachment A for the total number of PCAP default service customers.

The data requested in subparts (b) and (c) of this interrogatory prior to July 2017 is not available. See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 11, Attachment B for the data requested in subparts (b) and (c) from July 2017 to date.

(a) MET-ED (ME) PCAP Default Service Customers

OpCo	Year	Jan	Feb	March	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
ME	2017	10,262	9,353	8,751	10,371	10,468	10,434	10,244	10,228	10,202	10,286	10,425	10,549
ME	2018	10,438	10,679	11,191	11,146	11,443	11,533	11,475	11,439	11,547	11,489	11,456	11,300
ME	2019	11,128	11,175	11,204	11,287	11,123	11,672	11,923	11,896	11,836	11,708	11,527	11,559
ME	2020	11,834	12,043	12,268	12,895	13,771	14,442	14,913	15,359	15,725	16,397	16,761	17,487
ME	2021	17,921	18,302	18,599	18,789	18,665	18,702	18,684	18,687	18,883	19,192	19,495	19,721

(a) PENELEC (PN) PCAP Default Service Customers

PN	2017	15,519	14,160	13,208	15,453	15,543	15,474	15,333	15,326	15,364	15,496	15,650	15,747
PN	2018	15,656	15,807	16,373	16,205	16,500	16,586	16,674	16,519	16,569	16,512	16,557	16,391
PN	2019	16,193	16,251	16,157	16,037	15,795	16,292	16,667	16,651	16,551	16,404	16,161	16,260
PN	2020	16,607	16,940	17,156	17,701	18,417	19,184	19,662	20,142	20,595	21,401	22,115	22,953
PN	2021	23,508	23,977	24,433	24,825	24,846	24,805	24,845	24,867	25,210	25,639	26,055	26,510

(a) PENN POWER (PP) PCAP Default Service Customers

PP	2017	3,490	3,209	2,510	3,520	3,585	3,592	3,558	3,510	3,529	3,560	3,593	3,633
PP	2018	3,569	3,594	3,700	3,668	3,750	3,753	3,685	3,657	3,697	3,657	3,725	3,684
PP	2019	3,620	3,608	3,596	3,568	3,480	3,566	3,671	3,591	3,548	3,462	3,504	3,563
PP	2020	3,626	3,709	3,797	3,888	4,103	4,283	4,390	4,495	4,639	4,801	4,943	5,106
PP	2021	5,201	5,321	5,444	5,493	5,502	5,530	5,539	5,539	5,612	5,713	5,794	5,901

(a) WEST PENN POWER (WP) PCAP Default Service Customers

WP	2017	16,382	15,198	14,418	17,580	17,875	18,068	17,928	17,925	17,984	18,036	18,140	18,426
WP	2018	17,884	17,716	17,914	17,422	17,267	16,979	16,173	15,820	15,482	15,089	15,141	14,637
WP	2019	14,335	14,161	14,268	14,290	13,972	14,551	14,827	14,525	14,098	13,736	13,727	13,856
WP	2020	14,186	14,467	14,687	15,333	16,198	16,992	17,473	17,896	18,428	19,181	19,761	20,461
WP	2021	20,907	21,269	21,641	22,071	21,946	21,906	21,812	21,808	22,099	22,528	22,879	23,149

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Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 12**

“Please explain how FirstEnergy defines the term “confirmed low income customers” and identify the criteria to be considered a confirmed low income customer.”

RESPONSE:

The Companies define “confirmed low-income customers” as customers whose household income is at or below 150% of the Federal poverty guidelines.

The Companies determine “confirmed low-income” status based on customer self-reported income, Pennsylvania Department of Human Services data regarding customer income levels collected through the LIHEAP grant process, or income documents verified through the Companies’ PCAP enrollment process.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 13

Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 13**

“From January 2015 to date, disaggregated by year, please provide the dollar amount of residential write-offs and the number of associated accounts attributed to the following residential customer groups:

- (a) Total residential
- (b) Residential shopping customers
- (c) Residential default service customers
- (d) Confirmed low income customers
- (e) Confirmed low income customers not enrolled in PCAP
- (f) Confirmed low income customers enrolled in PCAP
- (g) Confirmed low income shopping customers that are not enrolled in PCAP
- (h) Confirmed low income default service customers that are not enrolled in PCAP
- (i) Shopping PCAP customers
- (j) Default service PCAP customers”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 13, Attachment A. This attachment presents gross write-off data for the requested categories of customers during 2018 – 2021. For responses (a) through (j), a customer is included if they met the criteria for the applicable subpart at any time during the year.

The attachment does not include data from 2015 to 2018 because the Companies’ reporting methodology changed in 2018 to include purchase of receivable write-offs. Therefore, analyzing gross write-off data for the 2015-2017 period would not result in an apples-to-apples comparison to 2018-2021 residential write-offs. In particular, the gross write-offs associated with the categories of customers identified in this interrogatory would be skewed lower during the 2015-2017 period because purchase of receivable write-offs were not included in the data set.

(a) TOTAL RESIDENTIAL

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	20,451	\$	15,086,855.85
PN	21,367	\$	15,375,291.09
PP	4,603	\$	3,368,702.74
WPP	20,433	\$	15,440,379.45
2018 Total	66,854	\$	49,271,229.13
2019			
ME	18,015	\$	14,982,009.93
PN	18,836	\$	15,226,992.04
PP	4,072	\$	3,458,556.81
WPP	18,862	\$	16,105,774.00
2019 Total	59,785	\$	49,773,332.78
2020			
ME	14,744	\$	10,548,379.18
PN	15,679	\$	11,240,361.00
PP	3,471	\$	2,390,675.51
WPP	15,259	\$	10,988,353.42
2020 Total	49,153	\$	35,167,769.11
2021			
ME	13,393	\$	12,039,198.44
PN	14,016	\$	12,480,173.21
PP	2,837	\$	2,389,632.66
WPP	13,015	\$	10,749,890.37
2021 Total	43,261	\$	37,658,894.68

(b) RESIDENTIAL SHOPPING CUSTOMERS

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	9,421	\$	7,292,467.62
PN	9,150	\$	6,668,884.93
PP	1,954	\$	1,525,249.70
WPP	8,431	\$	6,999,405.23
2018 Total	28,956	\$	22,486,007.48
2019			
ME	5,725	\$	5,946,678.72
PN	5,134	\$	5,254,102.09
PP	1,173	\$	1,275,249.56
WPP	5,707	\$	6,564,648.45
2019 Total	17,739	\$	19,040,678.82
2020			
ME	4,071	\$	3,696,864.86
PN	3,854	\$	3,418,814.06
PP	857	\$	831,962.49
WPP	3,987	\$	4,253,237.19
2020 Total	12,769	\$	12,200,878.60
2021			
ME	3,374	\$	4,150,783.91
PN	3,166	\$	3,777,000.95
PP	650	\$	787,476.31
WPP	3,013	\$	3,579,225.82
2021 Total	10,203	\$	12,294,486.99

(c) RESIDENTIAL DEFAULT SERVICE CUSTOMERS

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	11,030	\$	7,794,388.23
PN	12,217	\$	8,706,406.16
PP	2,649	\$	1,843,453.04
WPP	12,002	\$	8,440,974.22
2018 Total	37,898	\$	26,785,221.65
2019			
ME	12,290	\$	9,035,331.21
PN	13,702	\$	9,972,889.95
PP	2,899	\$	2,183,307.25
WPP	13,155	\$	9,541,125.55
2019 Total	42,046	\$	30,732,653.96
2020			
ME	10,673	\$	6,851,514.32
PN	11,825	\$	7,821,546.94
PP	2,614	\$	1,558,713.02
WPP	11,272	\$	6,735,116.23
2020 Total	36,384	\$	22,966,890.51
2021			
ME	10,019	\$	7,888,414.53
PN	10,850	\$	8,703,172.26
PP	2,187	\$	1,602,156.35
WPP	10,002	\$	7,170,664.55
2021 Total	33,058	\$	25,364,407.69

(d) CONFIRMED LOW INCOME CUSTOMERS

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	11,381	\$	11,349,341.59
PN	13,006	\$	12,096,128.66
PP	2,673	\$	2,677,018.24
WPP	10,248	\$	11,301,638.73
2018 Total	37,308	\$	37,424,127.22
2019			
ME	9,857	\$	11,311,070.59
PN	11,442	\$	12,119,044.63
PP	2,277	\$	2,691,610.42
WPP	9,534	\$	11,948,425.25
2019 Total	33,110	\$	38,070,150.89
2020			
ME	7,577	\$	7,840,605.59
PN	8,887	\$	8,690,416.43
PP	1,811	\$	1,836,931.31
WPP	7,300	\$	8,064,995.38
2020 Total	25,575	\$	26,432,948.71
2021			
ME	6,148	\$	8,312,074.68
PN	7,190	\$	8,954,892.80
PP	1,276	\$	1,638,741.19
WPP	5,516	\$	7,467,079.67
2021 Total	20,130	\$	26,372,788.34

(e) **CONFIRMED LOW INCOME CUSTOMERS NOT ENROLLED IN PCAP**

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	3,251	\$	3,647,574.99
PN	3,685	\$	3,882,323.41
PP	772	\$	854,054.99
WPP	3,730	\$	4,750,452.99
2018 Total	11,438	\$	13,134,406.38
2019			
ME	2,867	\$	3,699,851.76
PN	3,387	\$	3,951,603.06
PP	643	\$	860,852.49
WPP	2,968	\$	4,345,536.62
2019 Total	9,865	\$	12,857,843.93
2020			
ME	2,132	\$	2,442,555.64
PN	2,663	\$	2,813,621.79
PP	505	\$	593,207.65
WPP	2,110	\$	2,570,146.52
2020 Total	7,410	\$	8,419,531.60
2021			
ME	2,095	\$	2,707,056.29
PN	2,627	\$	3,149,231.50
PP	458	\$	482,013.83
WPP	1,899	\$	2,575,548.21
2021 Total	7,079	\$	8,913,849.83

(f) **CONFIRMED LOW INCOME CUSTOMERS ENROLLED IN PCAP**

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	8,130	\$	7,701,766.60
PN	9,321	\$	8,213,805.25
PP	1,901	\$	1,822,963.25
WPP	6,518	\$	6,551,185.74
2018 Total	25,870	\$	24,289,720.84
2019			
ME	6,990	\$	7,611,218.83
PN	8,055	\$	8,167,441.57
PP	1,634	\$	1,830,757.93
WPP	6,566	\$	7,602,888.63
2019 Total	23,245	\$	25,212,306.96
2020			
ME	5,445	\$	5,398,049.95
PN	6,224	\$	5,876,794.64
PP	1,306	\$	1,243,723.66
WPP	5,190	\$	5,494,848.86
2020 Total	18,165	\$	18,013,417.11
2021			
ME	4,053	\$	5,605,018.39
PN	4,563	\$	5,805,661.30
PP	818	\$	1,156,727.36
WPP	3,617	\$	4,891,531.46
2021 Total	13,051	\$	17,458,938.51

(g) **CONFIRMED LOW INCOME SHOPPING CUSTOMERS THAT ARE NOT ENROLLED IN PCAP**

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	4,060	\$	3,813,702.80
PN	4,363	\$	3,741,951.40
PP	852	\$	858,276.08
WPP	3,135	\$	3,146,399.87
2018 Total	12,410	\$	11,560,330.15
2019			
ME	2,462	\$	3,032,846.05
PN	2,454	\$	2,956,167.48
PP	560	\$	736,168.23
WPP	2,280	\$	3,136,864.06
2019 Total	7,756	\$	9,862,045.82
2020			
ME	1,721	\$	2,059,772.76
PN	1,678	\$	1,856,342.82
PP	370	\$	452,879.66
WPP	1,644	\$	2,217,568.29
2020 Total	5,413	\$	6,586,563.53
2021			
ME	1,223	\$	2,109,754.39
PN	1,209	\$	1,861,943.82
PP	220	\$	393,632.48
WPP	996	\$	1,693,124.14
2021 Total	3,648	\$	6,058,454.83

(h) **CONFIRMED LOW INCOME DEFAULT SERVICE CUSTOMERS THAT ARE NOT ENROLLED IN PCAP**

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	4,070	\$	3,888,063.80
PN	4,958	\$	4,471,853.85
PP	1,049	\$	964,687.17
WPP	3,383	\$	3,404,785.87
2018 Total	13,460	\$	12,729,390.69
2019			
ME	4,528	\$	4,578,372.78
PN	5,601	\$	5,211,274.09
PP	1,074	\$	1,094,589.70
WPP	4,286	\$	4,466,024.57
2019 Total	15,489	\$	15,350,261.14
2020			
ME	3,724	\$	3,338,277.19
PN	4,546	\$	4,020,451.82
PP	936	\$	790,844.00
WPP	3,546	\$	3,277,280.57
2020 Total	12,752	\$	11,426,853.58
2021			
ME	2,830	\$	3,495,264.00
PN	3,354	\$	3,943,717.48
PP	598	\$	763,094.88
WPP	2,621	\$	3,198,407.32
2021 Total	9,403	\$	11,400,483.68

(i) SHOPPING PCAP CUSTOMERS

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	1,814	\$	2,037,969.84
PN	1,822	\$	1,787,021.52
PP	409	\$	413,895.17
WPP	1,907	\$	2,422,704.46
2018 Total	5,952	\$	6,661,590.99
2019			
ME	1,121	\$	1,795,981.52
PN	1,074	\$	1,475,649.54
PP	222	\$	319,951.21
WPP	1,220	\$	2,085,920.23
2019 Total	3,637	\$	5,677,502.50
2020			
ME	626	\$	878,665.11
PN	721	\$	951,237.04
PP	131	\$	207,928.80
WPP	688	\$	1,149,598.34
2020 Total	2,166	\$	3,187,429.29
2021			
ME	482	\$	916,852.30
PN	568	\$	960,486.24
PP	82	\$	148,871.77
WPP	460	\$	960,550.61
2021 Total	1,592	\$	2,986,760.92

(j) DEFAULT SERVICE PCAP CUSTOMERS

	Number of Accounts		Sum of Gross Write-Off Amount
2018			
ME	1,999	\$	2,064,351.74
PN	2,406	\$	2,463,749.49
PP	477	\$	536,911.76
WPP	2,464	\$	2,917,953.17
2018 Total	7,346	\$	7,982,966.16
2019			
ME	2,271	\$	2,382,610.10
PN	2,788	\$	2,864,188.74
PP	508	\$	618,807.53
WPP	2,253	\$	2,799,021.35
2019 Total	7,820	\$	8,664,627.72
2020			
ME	1,886	\$	1,904,409.69
PN	2,411	\$	2,225,690.98
PP	443	\$	426,695.16
WPP	1,790	\$	1,781,402.61
2020 Total	6,530	\$	6,338,198.44
2021			
ME	2,028	\$	2,189,930.34
PN	2,548	\$	2,548,523.39
PP	445	\$	388,278.60
WPP	1,805	\$	1,963,333.47
2021 Total	6,826	\$	7,090,065.80

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 14

Witness: J. M. Savage

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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 14**

“From January 2015 to date, disaggregated by year, please provide the number of payment troubled customers for the following residential customer groups:

- (a) Total residential
- (b) Residential shopping customers
- (c) Residential default service customers
- (d) Confirmed low income customers
- (e) Confirmed low income customers not enrolled in PCAP
- (f) Confirmed low income customers enrolled in PCAP
- (g) Confirmed low income shopping customers that are not enrolled in PCAP
- (h) Confirmed low income default service customers that are not enrolled in PCAP
- (i) Shopping PCAP customers
- (j) Default service PCAP customers”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 14, Attachment A.

Payment Troubled Residential Customer Groups

(a) Total Residential (Payment Troubled)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	11,555	11,579	2,824	8,829
2016	9,037	9,077	2,602	7,190
2017	7,890	8,143	1,918	6,092
2018	7,908	7,676	1,755	6,494
2019	8,291	8,296	1,958	8,131
2020	4,876	4,649	1,219	4,919
2021	9,380	9,451	2,150	9,287

(b) Residential shopping customers (Enrolled with an external supplier at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	3,162	2,942	565	2,177
2016	2,834	2,510	633	2,079
2017	2,945	2,601	589	2,016
2018	2,593	2,134	493	2,007
2019	2,706	2,361	544	2,928
2020	1,462	1,209	339	1,298
2021	2,954	2,458	579	2,813

(c) Residential default service customers (Not enrolled with an external supplier at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	8,393	8,637	2,259	6,652
2016	6,203	6,567	1,969	5,111
2017	4,945	5,542	1,329	4,076
2018	5,315	5,542	1,262	4,487
2019	5,585	5,935	1,414	5,203
2020	3,414	3,440	880	3,621
2021	6,426	6,993	1,571	6,474

(d) Confirmed low income customers (CLI at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	7,994	8,592	2,093	5,596
2016	6,166	6,134	1,777	4,392
2017	5,085	5,542	1,302	3,280
2018	5,260	5,454	1,234	3,946
2019	6,166	6,134	1,777	4,392
2020	3,192	3,131	808	3,095
2021	6,104	6,176	1,412	6,001

Payment Troubled Residential Customer Groups

(e) Confirmed low income customers not enrolled in PCAP (CLI not enrolled in PCAP at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	7,144	7,725	1,895	5,596
2016	5,779	5,736	1,677	3,752
2017	4,657	5,069	1,188	2,876
2018	4,867	5,063	1,144	3,551
2019	5,779	5,736	1,677	3,752
2020	2,828	2,791	719	2,743
2021	5,511	5,625	1,295	5,411

(f) Confirmed low income customers enrolled in PCAP (CLI enrolled in PCAP at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	850	867	198	*
2016	387	398	100	640
2017	428	473	114	404
2018	393	391	90	395
2019	387	398	100	640
2020	364	340	89	352
2021	593	551	117	590

(g) Confirmed low income shopping customers that are not enrolled in PCAP (CLI not enrolled in PCAP and shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	1,939	1,967	383	1,441
2016	1,820	1,589	437	1,105
2017	1,755	1,680	363	1,004
2018	1,616	1,420	345	1,136
2019	1,820	1,589	437	1,105
2020	818	729	204	725
2021	1,707	1,463	366	1,622

(h) Confirmed low income default service customers that are not enrolled in PCAP (CLI not enrolled in PCAP and not shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	5,205	5,758	1,512	4,155
2016	3,959	4,147	1,240	2,647
2017	2,902	3,389	825	1,872
2018	3,251	3,643	799	2,415
2019	3,959	4,147	1,240	2,647
2020	2,010	2,062	515	2,018
2021	3,804	4,162	929	3,789

Payment Troubled Residential Customer Groups

(i) Shopping PCAP customers (Enrolled in PCAP and shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	271	247	52	*
2016	139	119	26	219
2017	159	177	45	148
2018	118	116	31	136
2019	139	119	26	219
2020	122	92	28	96
2021	184	146	34	202

(j) Default service PCAP customers (Enrolled in PCAP and not shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	579	620	146	*
2016	248	279	74	421
2017	269	296	69	256
2018	275	275	59	259
2019	248	279	74	421
2020	242	248	61	256
2021	409	405	83	388

**WP Customers did not participate in PCAP until 2016.*

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 18

Witness: J. M. Savage

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set I, No. 18**

“Since the implementation of its PCAP Shopping Program in June 2019, has FirstEnergy undertaken any analysis to compare the price PCAP customers pay compared to the default service price? If so, provide the results of such an analysis. If not, why not?”

RESPONSE:

The Companies have not performed any such analysis since the PCAP Shopping Program procedures and rules were implemented in June 2019. Under those rules, suppliers must charge PCAP customers rates for generation service at or below the applicable price-to-compare during the contract term. The Companies have not undertaken such an analysis as the Companies have confirmed that supplier enrollments submitted for a PCAP customer that are not compliant with the PCAP Shopping Program rules are rejected.

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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 2**

“From January 2015 to date, disaggregated by year and Company, please provide the number of customers in each of the following subgroups whose service was terminated for nonpayment:

- (a) Residential shopping customers (enrolled with a supplier at any time in the year).
- (b) Residential default service customers (not enrolled with an external supplier at any time in the year).
- (c) Confirmed low income shopping customers not enrolled in PCAP (CLI not enrolled in PCAP and shopping at any time in the year).
- (d) Confirmed low income default service customers not enrolled in PCAP (CLI not enrolled in PCAP and not shopping at any time in the year).
- (e) Shopping PCAP customers (enrolled in PCAP and shopping at any time in the year).
- (f) Default service PCAP customers (enrolled in PCAP and not shopping at any time in the year).”

RESPONSE:

See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set II, No. 2 Attachment A.

The Companies do not track historical confirmed low-income (“CLI”) customers at an account number level. Therefore, the attachment presents the data requested in this interrogatory as of a point in time with the residential, non PCAP, CLI, shopping or default service status as of 12/31/2021. The data provided in subparts (c) and (d) is for the month of December 2021.

Customers whose service was terminated for nonpayment

Residential shopping customers (enrolled with a supplier at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	9,046	7,456	1,333	4,396
2016	9,352	7,705	1,469	5,443
2017	8,260	6,609	1,358	4,184
2018	8,109	5,875	1,255	4,610
2019	7,758	5,558	1,167	6,068
2020	208	168	34	227
2021	6,318	4,530	593	3,916

Residential default service customers (not enrolled with an external supplier at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	12,862	11,713	3,027	7,149
2016	12,312	11,680	2,696	7,985
2017	12,292	12,003	2,530	8,585
2018	12,421	11,635	2,369	7,681
2019	13,868	12,519	2,586	10,847
2020	534	571	115	548
2021	15,156	13,012	1,647	10,165

CLI shopping customers not enrolled in PCAP (CLI not enrolled in PCAP and shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	3,806	2,730	648	3,274
2016	4,294	4,176	793	2,003
2017	4,178	3,955	774	2,182
2018	3,742	3,206	669	2,057
2019	3,547	3,069	636	3,074
2020	41	29	10	48
2021	2,453	2,085	284	1,638

CLI default service customers not enrolled in PCAP (CLI not enrolled in PCAP and not shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	5,065	4,465	1,117	4,068
2016	5,273	5,809	1,283	2,686
2017	4,424	5,193	1,039	2,602
2018	5,582	6,132	1,170	3,149
2019	5,893	6,453	1,297	4,989
2020	84	106	23	102
2021	5,188	5,343	651	3,827

Shopping PCAP customers (enrolled in PCAP and shopping at any time in the year).				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	1,159	1,018	185	*
2016	1,141	938	176	1,403
2017	2,364	2,175	409	2,517
2018	931	725	152	833
2019	730	518	127	613
2020	6	4	0	7
2021	708	562	58	439

Default service PCAP customers (enrolled in PCAP and not shopping at any time in the year)				
Year	Met-Ed	Penelec	Penn Power	West Penn Power
2015	1,281	1,366	248	*
2016	1,147	1,268	285	1,512
2017	2,364	2,175	409	2,517
2018	1,148	1,172	216	1,108
2019	1,193	1,154	211	1,005
2020	13	9	4	14
2021	2,337	2,080	218	1,620

*WP Customers did not participate in PCAP until 2016.

Customers were not CLI when terminated at any time during winter rules, but met the criteria for CLI after providing income information.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set II, No. 3

Witness: J. M. Savage

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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 3**

“Are residential customers with bill ready billing terminated for nonpayment of bill ready EGS charges? If so, please explain how FirstEnergy verifies whether bill-ready EGS charges include any charges for non-basic service. If FirstEnergy does not verify this information, please explain how FirstEnergy complies with section 56.83(3).”

RESPONSE:

Yes, residential customers who are bill ready can be terminated due to nonpayment of EGS charges. However, under Section 12.9 of the Companies’ Electric Generation Supplier Coordination Tariffs, the Companies only purchase receivables associated with basic electricity supply services and EGSs may not include charges for other products or services on the consolidated bill. The Companies believe EGSs are responsible for their compliance with Commission regulations requiring EGS separation of basic and nonbasic charges.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set II, No. 4

Witness: J. M. Savage

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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 4**

“Has FirstEnergy performed any analysis on the prices paid by residential customers enrolled in the Customer Referral Program (CRP) or following expiration of the CRP term? If so, please provide a copy of the analysis or other related documents.”

RESPONSE:

The Companies have not performed any analysis on the prices paid by residential customers enrolled in the CRP or following expiration of the CRP term.

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 5**

“Please identify the following data for 2020 and 2021, disaggregated by month:

- (a) The total number of customers whose Customer Referral Program (CRP) term expired in the prior month.
- (b) The total number of customers identified in response to subpart (a) that returned to default service.
- (c) The total usage (kWh) of the customers identified in response to subpart (b).
- (d) The total generation charges of the customers identified in response to subpart (b).
- (e) The total number of customers identified in response to subpart (a) that selected a new supplier.
- (f) The total usage (kWh) of the customers identified in subpart (e).
- (g) The total generation charges of the customers identified in response to subpart (e).
- (h) The total number of customers identified in response to subpart (a) that took no action to select a new supplier or return to default service.
- (i) The total usage (kWh) of the customers identified in subpart (h).
- (j) The total generation charges of the customers identified in response to subpart (h)”

RESPONSE:

The Companies do not track customer data based upon the termination of the customer’s CRP contract.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set II, No. 9

Witness: T. Cowan

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**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 9**

“See MetEd/Penelec/Penn Power/West Penn Exhibit TLC-1 at 12 of 23, proposed data tariff, Section 4.1(a): “The Third Party will treat data specific to a Customer that it accesses or retrieves, or both, as confidential information and ensure the confidentiality of such data specific to such Customer in accordance with all applicable statutes and regulatory orders or rules.” Please identify applicable statutes and/or regulatory orders currently in place that would obligate a third party to keep information obtained from FirstEnergy confidential.”

RESPONSE:

After the communication of a verbal objection, CAUSE-PA has agreed to strike the last sentence of this interrogatory and replace it as follows: “Please provide any applicable statutes that FirstEnergy has identified as obligating a third party to keep information confidential.” Accordingly, the Companies respond to the question, as revised, as follows:

The Companies have not performed the legal research requested in this question regarding current statutes and/or regulatory orders that would obligate a third party to keep information they have obtained from the Companies confidential.

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set II, No. 12**

“Does FirstEnergy have or intend to develop a customer authorization form for use by Third parties to obtain customer consent for the release of information? If so, please provide a copy or explain what information and disclosures will be included in such a form. If not, please explain why not, and indicate whether FirstEnergy will develop other guidance to third parties regarding the contents of a customer consent / authorization form.”

RESPONSE:

Yes. Customer information authorization requirements, including the customer information authorization form, are located at https://firstenergycorp.com/content/dam/customer/csp/CustUsageInfoAuthForm-Generic_5-30-07.pdf.

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set III, No. 3**

“If a customer contacts FE about a high bill and/or to seek a payment arrangement, are they actively screened for eligibility in FE’s universal service programs? If the answer to this question is yes, and the customer is referred for enrollment in a universal service program, are they also solicited for enrollment in the Customer Referral Program (CRP) at the conclusion of the call? Please explain why or why not.”

RESPONSE:

Yes, if the customer calls about a high bill and/or seeks a payment arrangement, the agent will request income information to determine eligibility for the Companies’ universal service programs. If the customer is eligible, according to regulatory income guidelines, they are referred for enrollment in a universal service program.

A customer that is referred for enrollment in a universal service program may also be solicited for enrollment in the Customer Referral Program at the end of a billing inquiry call after the customer’s high bill concerns are satisfied consistent with the Commission’s guidance in its Retail Market Investigation and the Companies’ second default service proceedings. *See Investigation of Pennsylvania’s Retail Elec. Mkt.: Intermediate Work Plan*, Docket No. I-2011-2237952 (Final Order entered Mar. 2, 2012), p. 32; *Joint Petition of Metropolitan Edison Co., Pennsylvania Elec. Co., Pennsylvania Power Co. and West Penn Power Co. For Approval of Their Default Service Programs*, Docket Nos. P-2011-2273650 et al. (Opinion and Order entered Aug. 16, 2012), pp. 139-140.

ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set III, No. 6

Witness: J. M. Savage

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**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA Set III, No. 6**

“If a customer is referred to a universal service program, is there any circumstance in which they would also be referred to CRP on the same call? If yes, please identify and explain those circumstances. Please specifically note whether there is a difference in response if the customer is referred to the Customer Assistance Program, the Hardship Fund Program, or other universal service program.”

RESPONSE:

A non-shopping residential customer is eligible for the Customer Referral Program (“CRP”) prior to enrollment in the Companies’ Customer Assistance Programs (“PCAP”). If a customer is referred to a universal service program, they may also be referred to CRP. A customer can receive grants from a universal service program and may also enroll in the CRP but is ineligible for the CRP if enrolled in PCAP.

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

OFFICE OF CONSUMER ADVOCATE Set I, No. 2

“With regard to CAP customers enrolled with an EGS, provide the customer usage, name of the EGS, the EGS charges billed to each EDC CAP customers for each month for the period June 2019 through the current month and every month during the pendency of this proceeding for each EDC.”

RESPONSE:

Via email correspondence on January 24, 2022, the OCA agreed to a revision of this question to the following:

1. Please provide the number of CAP customers enrolled with an EGS for each month starting in June 2019 through the pendency of this proceeding.
 2. With regard to CAP customers enrolled with an EGS, provide the customer usage, name of the EGS, the EGS charges billed to each EDC CAP customers for months of January through March 2020.
-
1. See ME/PN/PP/WP Response to CAUSE-PA Interrogatory Set I, No. 10 Attachment A for the total number of CAP shopping customers from January 2017 to date.
 2. See ME/PN/PP/WP Response to OCA Interrogatory Set I, No. 2, Highly Confidential Attachment A.

Note, there are a limited number of accounts for each company where the query did not return the requested data; this may arise in a circumstance where a new customer that was enrolled in PCAP that month but did not receive a bill until the following month or a customer who switched suppliers mid-month. These accounts are indicated as either single or double blanks.

ME/PN/PP/WP Response to OCA Interrogatory Set I, No. 7

Witness: J.M. Savage

Page 1 of 1

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

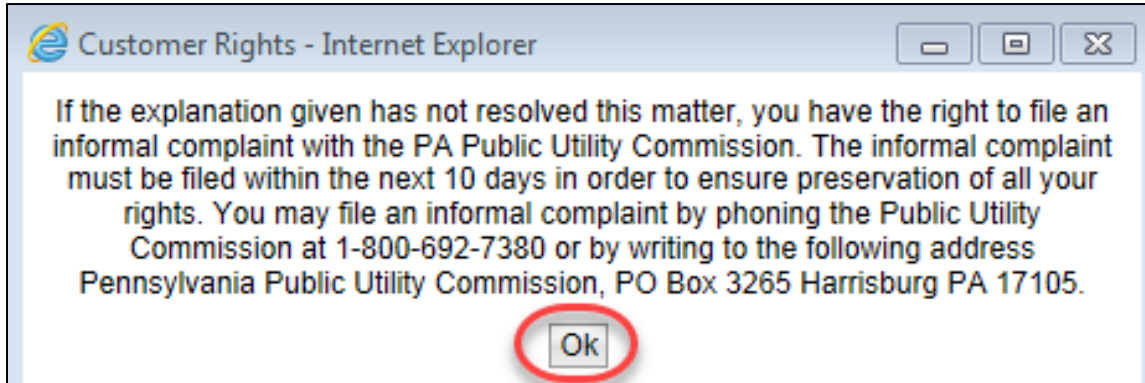
OFFICE OF CONSUMER ADVOCATE Set I, No. 7

“Provide the scripts and training materials currently used by customer service representatives for the Referral Program and identify any changes to these scripts and training materials since June 2019.”

RESPONSE:

See ME/PN/PP/WP Response to OCA Interrogatory Set 1, No. 7 Attachments A-F, which are the scripts and training materials currently used by the Companies’ customer service representatives for the Referral Program. There have been no changes to the documents since June 2019.

When the caller indicates they are not satisfied, an additional pop-up message containing the verbal dispute rights appears. It is important to read the following scripting to provide the caller with their right to file an informal complaint with the PUC. Click **Ok** to return to the Move-In Process.



AllConnect (All States except NY)

FirstEnergy has partnered with AllConnect, a home service connections company which operates the "Connections Program." The program gives the customer the opportunity to set up or cancel other home-related services which are associated with moving, on the same phone call as the transfer of electric service.

This free service is offered to all eligible Residential customers who are moving into or within the participating territory. The following callers are ineligible and unable to participate in the program:

- Landlords
- Apartment Management Companies
- Homebuilders
- Non-Residential Business Partners
- Third Party Applicants

The Connections script is automatically generated for Residential service based on the premise zip code. This program is offered at the end of the **Move-In Process**, when appropriate. If a customer is being transferred to another department, such as Residential Billing or New Service/Upgrade/Construction, choose the **Customer Not Available** option and do not offer AllConnect.

If the Connections script is presented, it must be read verbatim, with the exceptions listed previously.

Basic Move-In and Move-Outs

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Surge Assist Program

The Surge Assist Program provides protection from the unexpected cost of repairing or replacing electrical items damaged by a surge.

The program is only offered when the call is transferred to AllConnect as a part of the move-in process or for the PA Customer Referral Program.

This is not a surge device, but financial reimbursement. [REDACTED]

Note: For Complaints and Escalated Inquiries regarding the Surge Assist Program, send a Telememo to Category: Misc Requests, Description: Consumer Products.

A complete list of services that AllConnect offers for each state is available in **CNet**.



Procedure Form Title: [AllConnect – The Connections Program – \[REDACTED\] PA, \[REDACTED\]](#)

Procedure Form Title: [Surge Assist Program - \[REDACTED\] PA](#)

PA Customer Referral Program

For Pennsylvania Residential and small Commercial customers, the AllConnect scripting presents differently and varies depending on whether an existing Residential customer is currently enrolled in PCAP or not. This program is only offered when speaking with the account holder. Read the scripting and select the appropriate radio button based on the customer's response.

PA Residential Customer Not Enrolled in PCAP

Are you satisfied with the outcome of your call today?
 Yes No Not Applicable

Are you satisfied with what I have done for you today? I have completed your order. With your permission, I will transfer you to our vendor. They will offer you potential rate savings through our Electric Choice Program, and help you to set up other services if needed. English:918883584259 Spanish:918883584260

Transfer call w/data Customer declines Customer Not Available

Additional Com...

PA Residential Customer Enrolled in PCAP

Are you satisfied with the outcome of your call today?
 Yes No Not Applicable

Are you satisfied with what I have done for you today? I have completed your order. With your permission, I will transfer you to our vendor that will help you to set up other services if needed. English:918883584259 Spanish:918883584260

Transfer call w/data Customer declines Customer Not Available

Additional Com...

Transfer the caller after clicking the **Submit** button to complete the move-in.

Additional Comments

Add documentation to the **Additional Comments** field that may be pertinent to the call.

Additional Comments:	
<input type="button" value="Submit"/>	

PA Customer Referral Program

Residential customers in Pennsylvania may be referred to AllConnect for additional supplier information. The **Customer Referral Program Script** displays for residential customers who are not currently shopping with a supplier or enrolled in PCAP. Read the script verbatim to determine if the customer wishes to speak with an AllConnect representative.

Script
Based on the analysis, the bill in question may be incorrect
Script read / details provided to customer: <input type="radio"/> Yes <input type="radio"/> No
Are you satisfied with the outcome of your call today?
<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
PP-ENERGY SUPPLIER PTC: 0.06625900 cents per kWh.
In Pennsylvania, you can choose the company that provides your electricity without impacting the quality of service. Would you like to speak to a representative who can offer you a potential savings opportunity by enrolling with an electric generation supplier?
If customer declines advise caller: "Please visit PAMPowerSwitch.com for more information"
English: 918888520022 Spanish: 918887530371
<input type="radio"/> Transfer call w/ data <input type="radio"/> Customer declines <input type="radio"/> Customer Not Available

Note: This script does not display for customers who are currently shopping or enrolled in PCAP.

If the customer accepts, select **Transfer call w/ data** and copy the appropriate phone number into the softphone. After submitting the **Bill Inquiry**, advise the customer to remain on the line for the AllConnect transfer. Contact notes automatically reflects the customer's decision.

English: 918888520022 Spanish: 918887530371
<input checked="" type="radio"/> Transfer call w/ data <input type="radio"/> Customer declines <input type="radio"/> Customer Not Available

An additional contact will display on the **Fact Sheet** when the **Bill Inquiry** is submitted.

Contacts				
<input type="checkbox"/> New	BP Summary	CA Summary		
Contact Nbr	Contact Dt	Created Dt	Activity Text	
[REDACTED]	12/22/2015	12/22/2015	Transfer call w/data to All...	
[REDACTED]	12/22/2015	12/22/2015	Bill Inquiry	

If the customer refuses, select **Customer declines**. Advise caller to go to PAPowerSwitch.com for more information. Contact notes automatically reflects the customer's decision.

If customer declines advise caller: "Please visit PAPowerSwitch.com for more information"

English: **918888520022** Spanish: **918887530371**

Transfer call w/ data
 Customer declines
 Customer Not Available

Bill Inquiry Results

Click the **Submit** button when the **Bill Inquiry** process is complete. When viewing the **Fact Sheet**, the contact appears as shown below.

Contacts				
	New	BP Summary	CA Summary	
	Contact Nbr	Contact Dt	Created Dt	Activity Text
	[REDACTED]	12/22/2015	12/22/2015	Transfer call w/data to All...
	[REDACTED]	12/22/2015	12/22/2015	Bill Inquiry

Click the **CA Summary** for a full view of the **Bill Inquiry** contact.

11/07/2018 12:56:02	11/07/2018	[REDACTED]	Bill Inquiry
---------------------	------------	------------	--------------

Customer Calling: [REDACTED]
 (Business Partner)

Nature of Inquiry:
 Bill for \$276.93 from 11/01/2018 to 01/02/2019 Est
 Estimated Read Concern

Read Validation:
 Misread/poor estimate suspected: No

Alternatives/Solutions:
 Educate customer: Decline
 Offered to rebill current estimated bill for a different amount

Notifications:
 CBA Declined

Company Position:
 The bill in question was incorrect/offered rebill
 Something else
CUSTOMER DECLINED REBILL

Summary:
 Customer was satisfied.
 Script read/details provided to customer
 AllConnect - Call transferred

Additional Comments:
 Bills will be mailed to: current mailing address



Supplier Enrollment & Billing Overview

Pennsylvania Customer Referral Program

Pennsylvania operating companies have been ordered by the commission to implement a shopping referral program to promote shopping and encourage new customers to choose an alternate generation supplier. This program is applicable for eligible residential and small commercial customers. The PTC process provides scripting and information to transfer customer choice supplier referral calls to AllConnect.

Criteria for the program:

- Pennsylvania customers not enrolled in PCAP
- Residential & small commercial customers
- Non-shopping customer
- Only offered when speaking with the account holder

If the example below, the account holder is calling about suppliers and meets the criteria for the PTC process.

The PTC process will be used anytime a non-shopping residential customer, not enrolled in PCAP, inquiries about suppliers or their Price to Compare (PTC). It is important that the customer is transferred to allow AllConnect to explain the program. When a customer is discussing shopping, the PTC process will begin by using the suggested verbiage below.



“In Pennsylvania, you can choose the company that provides your electricity without impacting the quality of service. Would you like to speak to a representative who can offer you a potential savings opportunity by enrolling with an electric generation supplier?”

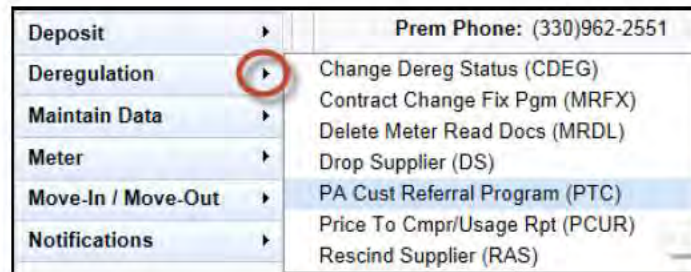


Details of the program are as follows.

- Fixed pricing for a 12-month period
- 7% below the electric distribution company's current price to compare default service rate at the time of the enrollment

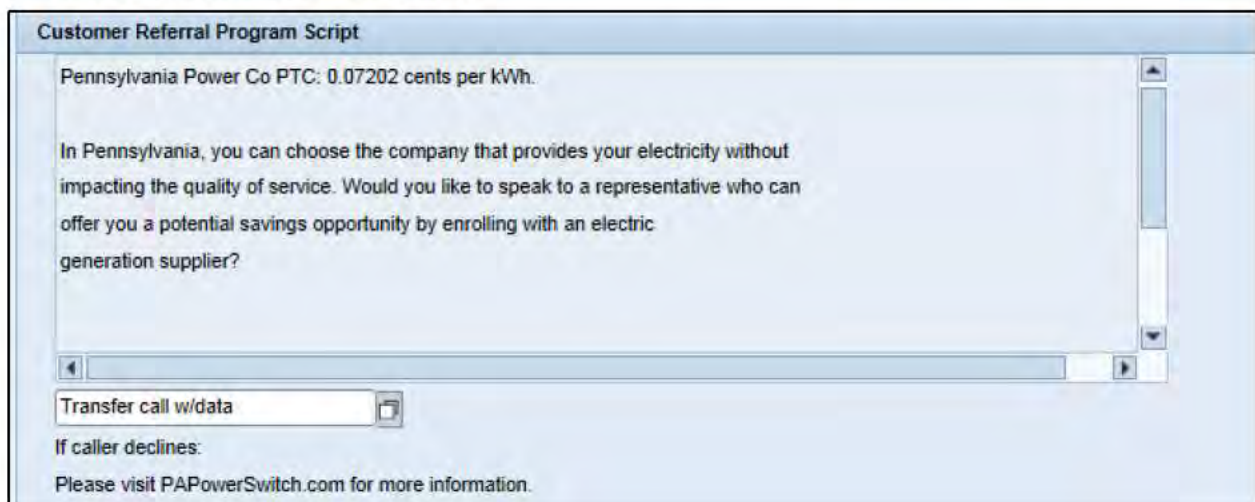
How to Launch the PTC Transaction

1. From the Navigation Bar, click the arrow next to **Deregulation** and select **PA Cust Referral Program (PTC)**.



Note: The PTC transaction can also be launched by entering PTC in the call code box and pressing Enter.

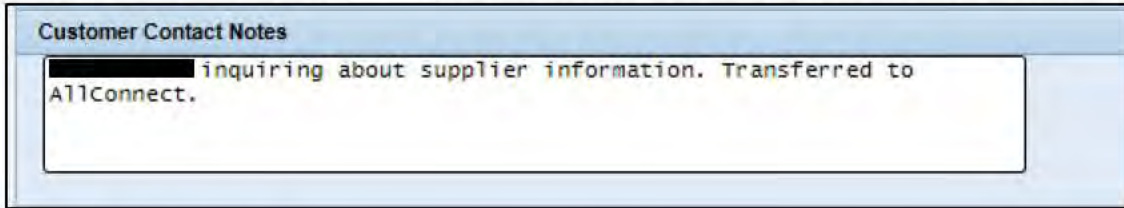
2. Read the **Customer Referral Program Script**. Select the applicable action from the drop-down. The current PTC information is provided, but not required to be given to the customer before transferring to AllConnect.



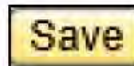


Supplier Enrollment & Billing Overview

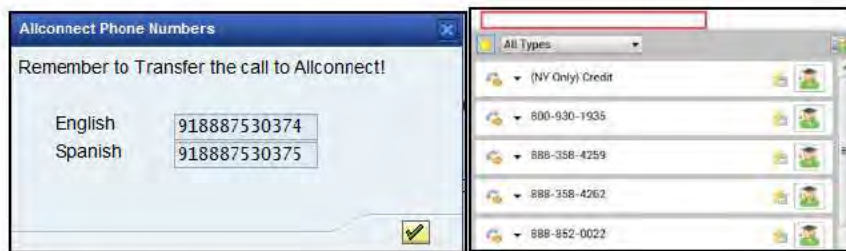
3. Document in the **Customer Contact Notes** field. Include in notes: *the customer calling, what information the customer was inquiring about (i.e. supplier information, current price to compare), and if the customer was transferred to AllConnect or declined to be transferred.*



4. Click the **Save** button.



5. Phone numbers for AllConnect will appear. Copy and paste the AllConnect phone number into the **phone number** field using the **Instant Transfer** function in **Workspace**. Precede the number with **91**.



6. Click the **Continue** button.



Note: Remember to ask satisfaction before transferring the customer to AllConnect.

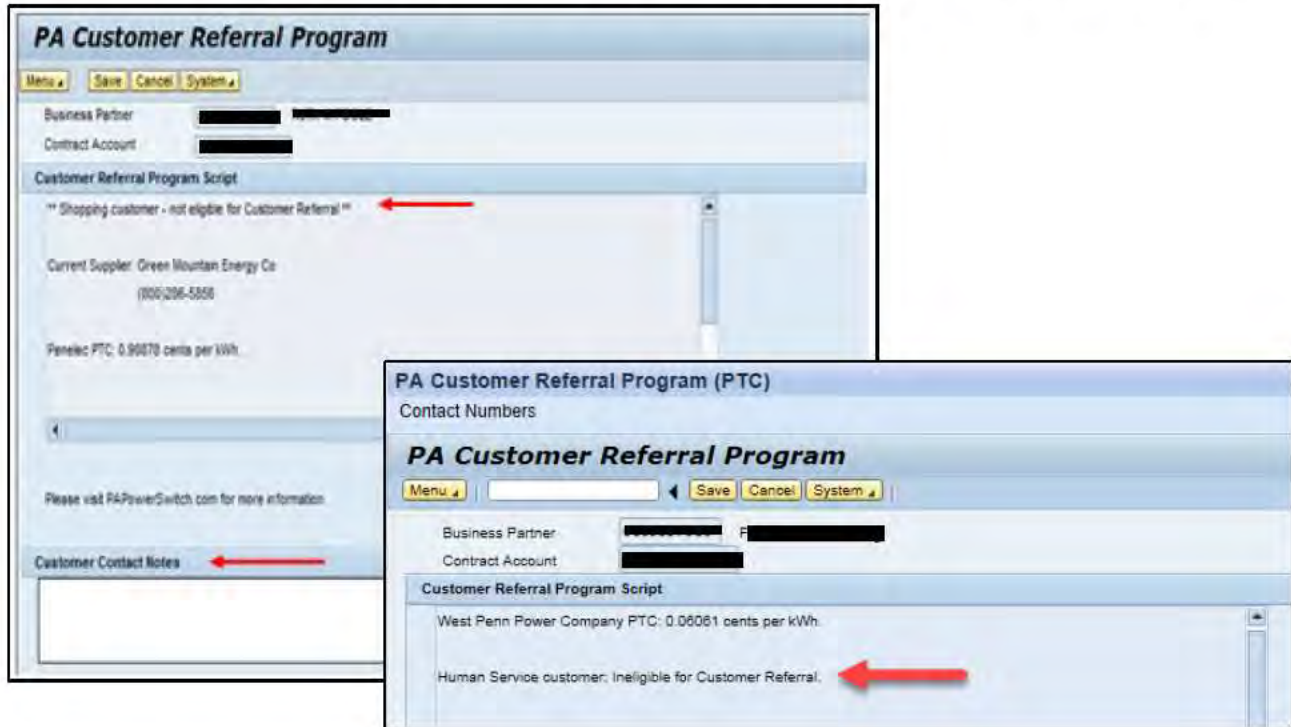


Job Aid: [PTC-Price to Compare](#)



PTC Transaction for PCAP or Shopping Customers

Customers that are currently enrolled in PCAP or have a supplier, will not be referred to **AllConnect**. If the PTC process is launched, The Customer Referral Program Script states they are a *Shopping customer* or a *Human Service customer* and ineligible for the referral. The current supplier information will be presented in either case when the customer is shopping.



Document any notes in the Customer Contact Notes field

PCAP Customers and Alternate Suppliers

Effective June 1, 2019, the PA PUC ordered that customers enrolled in the PCAP program may only take service from an electric generation supplier at a per kWh price that is at or below the FirstEnergy's price-to-compare (PTC).

PCAP Customers Enrolling with an Alternate Supplier

Special shopping guidelines apply to PA customers while enrolled in the PCAP program:

- Suppliers must offer a rate that is lower than the price-to-compare offered by FE
- The rate must remain at or below the FE price-to-compare for the duration of the customer's contract
- Suppliers may not charge additional fees such as early termination or cancellation fees



Supplier Enrollment & Billing Overview

Shopping Customers Enrolling in PCAP

For customers that are currently shopping and enrolling in PCAP, additional guidelines apply based on the type of supplier contract:

- Fixed rate contracts:
 - Suppliers may continue with the current contract until expiration or termination, whichever comes first
 - A new contract must offer a rate below FE's price-to-compare or return the customer to full service with FE
- Variable rate contracts:
 - Suppliers may offer a new contract at a rate below FE's price-to-compare or return the customer to full service with FE

If the supplier returns the customer's account to FE, the supplier must follow the cancellation terms of the contract, or at a minimum, provide a 30-day notice prior to ending the contract if no cancellation terms exist. If the customer requests to end their existing contract, fees may apply. The customer would need to contact their supplier to determine if fees are applicable.

Note: *The system is designed to reject contracts that are not compliant with the rulings.*

PTC Transaction for Ineligible Customers

As stated earlier, the PA Customer Referral Program is only available to residential and small commercial customers. If a customer does not meet the required the criteria, the following pop-up will display when launching the PTC transaction.



Pennsylvania Instant Connect

Residential and small business customers calling to start service in one of our Pennsylvania Operating companies can have an alternate supplier contract begin on their account effective as of their move in date. Once the customer requests the move in and obtains an account number, they may shop for alternate suppliers to get the best rate available to them. The alternate supplier they choose will submit the information to us electronically and once the contract is accepted, the customer could have the supplier as of their move in date.

Eligibility

We will accept and process any enrollment received on a pending account, for a premise that has a meter in CRM. Listed below are the exceptions that would prevent an Instant Connect Move-In.

- New Construction (No meter set at the property)
- Web requested move-Ins
- Customers that failed the POS-ID process (Move in pending verification of identity)
- Pending accounts created due to refusal of a security deposit
- Request for same day or back dated move-in



Supplier Enrollment & Billing Overview

Once eligibility requirements are met a supplier will send the request through and EDI transmission. Once that is accepted the Customer Contact will clearly state **Instant Connect Enrollment Request (Accepted)**.

Contacts				
Contact Nbr	Contact Dt	Created Dt	Activity Text	
[Redacted]	07/05/2...	07/05/2...	Instant Connect Enrollment Request (Accepted)	Instant Connect Enrollment
[Redacted]	07/05/2...	07/05/2...	Optional Payment Programs	
[Redacted]	07/05/2...	07/05/2...	Move-In / Advised of Service Charge	

Multiple Instant Connect Switch Requests

A customer may contact multiple suppliers when deciding to shop for an alternate supplier contract for an Instant Connect Move-In. If we receive multiple EDI transmissions from alternate suppliers, the system will overlay each new supplier contact until the day of the move in. The last supplier received will be the supplier that starts on the move in date.

In the following example, we see a contact showing multiple Instant Connect Switch Requests. In this example, the contact dated 07/05/2016 at 17:05:00 is the last supplier received and will be the supplier on record on the move in date.

Contact Date	Created Date	Contract Acct	Created By	Description
07/05/2016 17:05:00	07/05/2016	[Redacted]	[Redacted]	Instant Connect Switch Request (Accepted)
07/05/2016 17:03:41	07/05/2016	[Redacted]	[Redacted]	Instant Connect Switch Request (Accepted)
07/05/2016 17:03:05	07/05/2016	[Redacted]	[Redacted]	Instant Connect Enrollment Request (Accepted)
07/05/2016 17:02:50	07/05/2016	[Redacted]	[Redacted]	Optional Payment Programs
E-Bill Selection: No				
Credit Card Selection: Does not apply				
Low Income Assistance Selection: Does not apply				
07/05/2016 17:02:47	07/05/2016	[Redacted]	[Redacted]	Move-In / Advised of Service Charge
Move In Date: 07/22/2016				
Bills will be mailed to: service address				
Advised Security Deposit: No Advised Service Charge: No				
Created By: [Redacted]				
Customer did not wish transfer to supplier				
Release BP Information				



Standard Offer Program

Before you begin taking calls, you need a good understanding of how the Standard Offer program works. This course will introduce you to the Standard Offer program and prepare you to add these calls to your skill set.

INTRODUCTION

- ☰ The Rundown

PROGRAM BASICS

- ☰ Common Terminology
- ☰ What is the Standard Offer?
- ☰ Agent Role

IN CONCERT

- ☰ Order Flow - FE Movers
- ☰ Order Flow - ██████████

ADDITIONAL INFORMATION

- ☰ FAQs and Customer Objections

☰ Compliance Information

Lesson 1 of 8

The Rundown

In this course, you'll learn everything you need to know about the Standard Offer program.

The course will cover:

- 1 Program basics like terminology, offer details, and customer benefits
- 2 How it looks in Concert
- 3 Frequently Asked Questions and best responses

[Let's Get Started!](#)

Lesson 2 of 8

Common Terminology

Before we get into the details of the Standard Offer Program (SOP), let's review some common terminology you'll need to know.

[Click each item below](#) to learn common terms and definitions.

Deregulation —

Most utility markets are Regulated – governed by a regulatory or government body which controls all energy-providing processes including generation, transmission, distribution, as well as pricing. In Regulated markets only the local utility is able to sell directly to consumers.

In **Deregulated** markets, customers are allowed to choose the supplier for the electric generation portion of their services. Retailers are competitive in these markets, offering customers innovative features, pricing plans, and options that would otherwise have not been available.



Supplier —

The Supplier generates electricity, establishes the usage rates, and makes the electricity available to use by the customer.

A **Default Supplier** is automatically chosen for a customer when they set up electricity services. Typically the default supplier of the customer's electricity is the utility itself.

In deregulated markets, customers can choose an **Alternate Supplier** to take advantage of the Standard Offer Program discount. On SimpleChoice calls you will be educating customers about their ability to shop for an alternate supplier.



Distributor —

The Distributor is the company that owns the poles, lines, and equipment necessary to electric delivery (i.e. FirstEnergy). The distributor is responsible for billing the customer; maintaining poles, lines, meter boxes and other components required for electric delivery; and serves as the default supplier if the customer does not choose an alternate supplier. Customers will continue to contact their distributor for billing issues, maintenance concerns, and power outages when they enroll in SOP.



Price-to-Compare (PTC) —

The Price-to-Compare is the price per kilowatt hour (kWh) charged by the utility company for the customer's electricity services. This is the price that is discounted through the Standard Offer Program. The PTC changes quarterly and may be higher or lower than the discounted rate throughout the 12-month enrollment period.



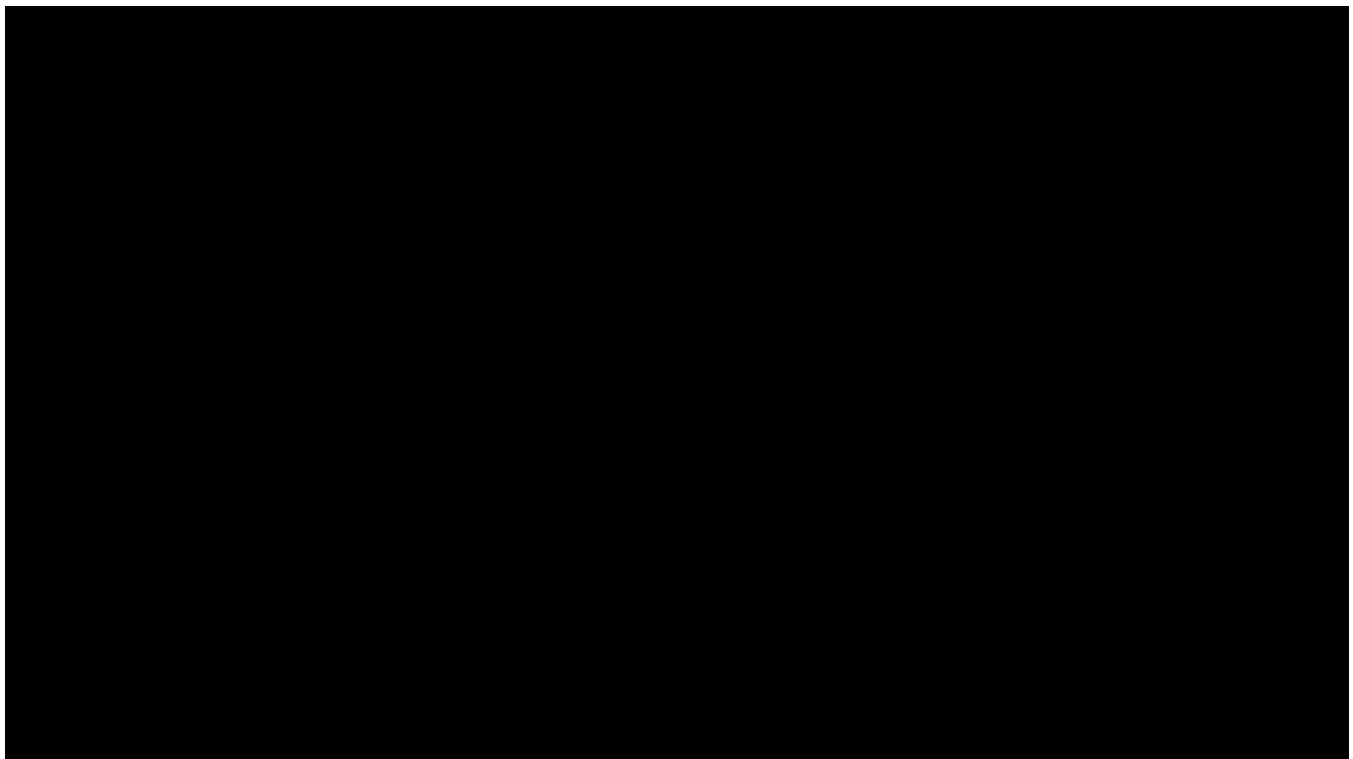
View ALL content before moving on.

Lesson 3 of 8

What is the Standard Offer?

Did you know that electric utilities in the state of Pennsylvania are **deregulated**? Energy deregulation makes utility company monopolies a thing of the past. Customers who live in deregulated states have the power to choose their energy supplier, although many customers are unaware they have this choice. The Pennsylvania Public Utilities Commission created the Standard Offer Program to encourage customers to take advantage of this choice by shopping around for an alternate supplier.

[Watch the video](#) to learn more.





Watch the video before moving on.

First Energy chose to work with Allconnect to create SimpleChoice – a program designed to get the word out about the Standard Offer Program in Pennsylvania and provide unbiased education and support to customers looking for more information about Standard Offer.

Keep reading to learn more about the details of SOP.

1



7% Discount

The Standard Offer Program provides customers with a discount on the electricity generation portion of their utility bill simply for switching to a competitive supplier. The customer will get 7% off the utility's current Price-to-Compare rate.

Fixed Rate

The customer's new discounted Price-to-Compare rate is locked in for 12 months, so even when the Price-to-Compare changes the customer's rate stays the same. If the Price-to-Compare drops below their discounted rate, the customer can choose to cancel or re-enroll in the program.





Low Risk

Customers who choose to participate in the Standard Offer Program can take comfort in knowing that they can make changes to their enrollment at any time without penalties or fees. This includes changing their supplier, canceling their enrollment, or re-enrolling to take advantage of a lower discounted rate.

CONTINUE

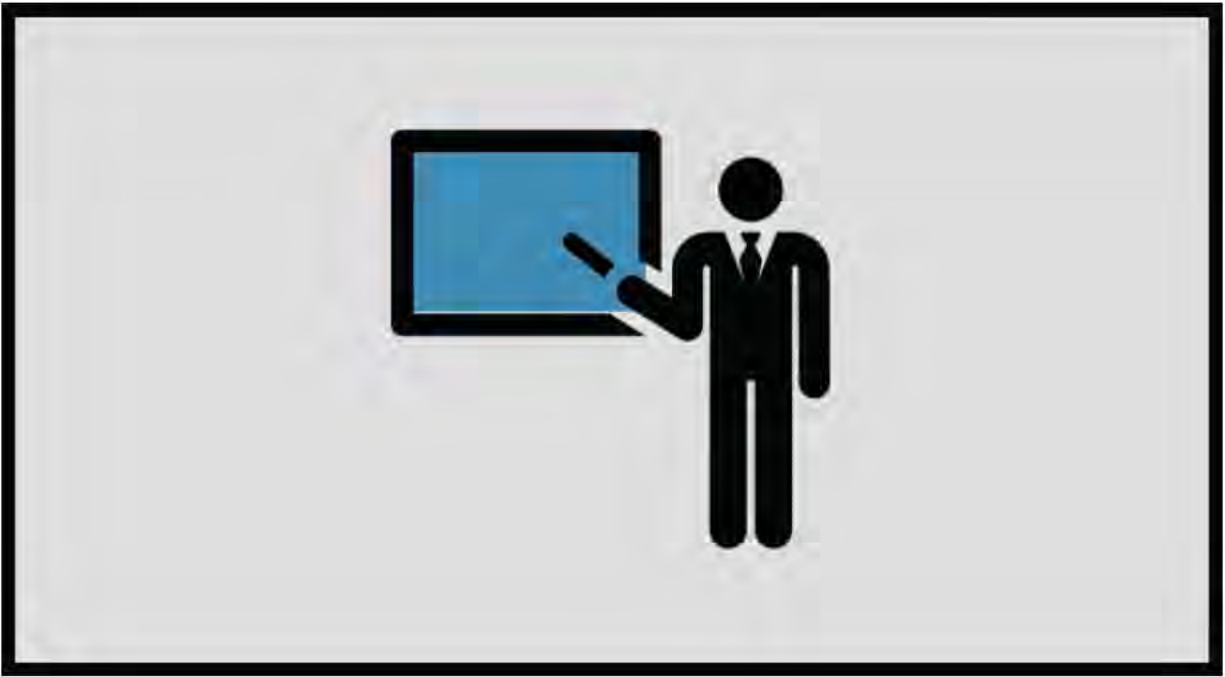
Lesson 4 of 8

Agent Role

SimpleChoice calls are different from the other calls you take in many ways. The most important difference in these calls is that you're not actually **SELLING** the customer on the Standard Offer Program. Your role is to **EDUCATE** the customer on their ability to choose an alternate supplier.

Click each tab below to learn more about your role in SimpleChoice.

1. EDUCATE	2. SELL THE BENEFITS	3. ENCOURAGE PARTICIPATION	4. SIGN THEM UP!
<p>The SimpleChoice program was created to educate customers about the benefits of the Standard Offer Program. FirstEnergy is indifferent about the customer's decision to enroll in SOP - their goal is not to increase participation in the program, but rather to increase awareness of the program and provide information about SOP to their customers. Help your customer understand what the Standard Offer is and why it's being offered. If you've done your job correctly, the customer should understand that they have a choice in who provides their electricity.</p>			



1. EDUCATE

2. SELL THE BENEFITS

3. ENCOURAGE
PARTICIPATION

4. SIGN THEM UP!

Agents are responsible for explaining the benefits of SOP to the customer. Most customers are unaware that SOP even exists, so agents need to have a good understanding of the program and why it is beneficial to the customer. Scripting in Concert covers all the benefits of the program! If your customer still seems hesitant, remind them:

- the program will help them save money
- they can re-enroll any time to further increase savings
- the discounted rate they receive through SOP is fixed for 12 months and protected against fluctuating PTC rates
- the program presents almost no risk to the customer since they can opt out or change their enrollment at any time with no penalties or fees



1. EDUCATE

2. SELL THE BENEFITS

3. ENCOURAGE
PARTICIPATION

4. SIGN THEM UP!

Remember, your job is not to SELL the customer on the program or push them into choosing an alternate supplier. Your job is to educate customers about the program and encourage them to enroll by explaining the benefits of participation. **Agents must remain unbiased when offering the program and not recommend specific suppliers.** In addition, agents should not push customers to enroll in the program. If the customer does not want to enroll, make sure they understand the program and keep the call moving.



1. EDUCATE


2. SELL THE BENEFITS

3. ENCOURAGE
PARTICIPATION

4. SIGN THEM UP!

If you've educated the customer correctly by following scripting in Concert, the SOP basically sells itself. Follow Concert to complete the enrollment process, taking care to read all disclosures verbatim and verify all necessary customer information. Your customer may still have questions during the enrollment process, so take your time and listen carefully. After completing the customer's enrollment, proceed with the call as normal.



 Click ALL tabs before moving on.

Lesson 5 of 8

Order Flow - FE Movers

The Standard Offer order flow for FirstEnergy isn't very different from a standard utility call. You'll start the call the same way, by collecting and/or verifying basic customer information and offering Savers Program. Then, you'll talk about SOP.

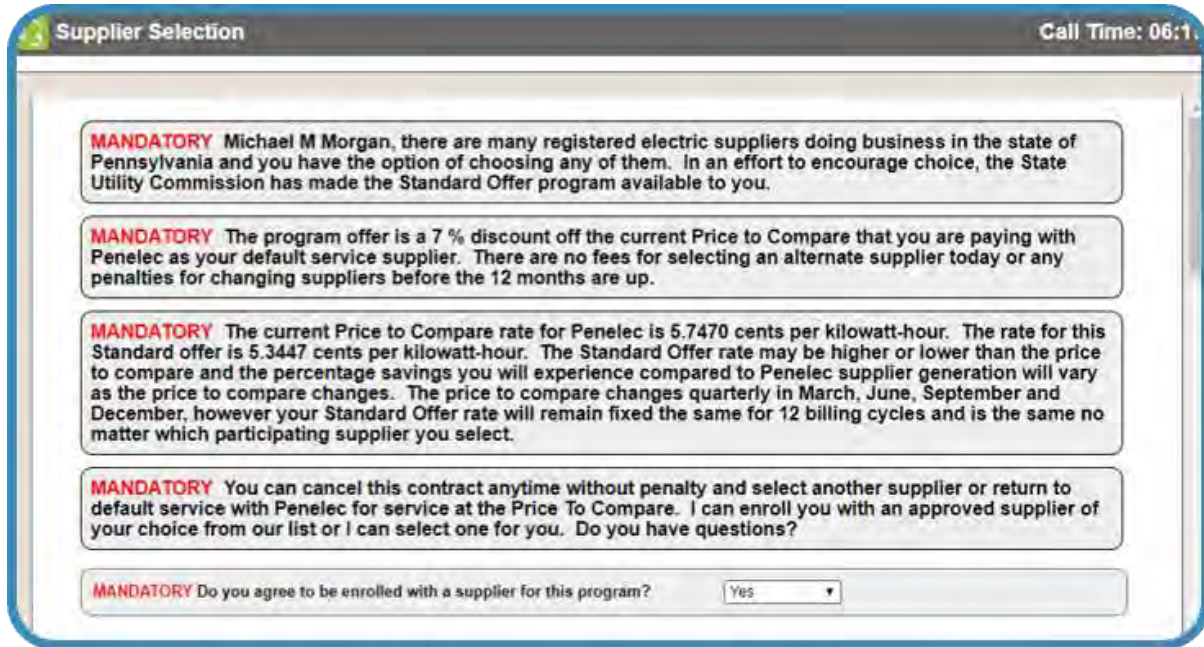
[Click through the slideshow](#) to see what the process looks like in Concert.

SOP Concert Flow - FirstEnergy

Selling SOP on FirstEnergy calls is easy. Just follow Concert! Click START to view the Concert Flow slideshow.

Step 1

Explain the Program



Follow Mandatory Disclosures in Concert to explain the Standard Offer Program to the customer. Keep in mind that your customer may know FirstEnergy by another name (ex: West Penn Power). Read the disclosures word for word at a steady pace. When reading pricing information (like the PTC) you need to read the entire number as it appears. If the customer interrupts with a question, answer the question and then pick up where you left off just as you would with other disclosures.

Step 2

Supplier Selection - When They Don't Know

The screenshot shows a software interface with three mandatory messages and a dropdown menu. The first message asks if the user knows a supplier or wants to select from a rotating list, with a dropdown menu set to 'No'. The second message states, 'I can select a supplier for you from a rotating list.' Below this is a 'Next Supplier' button. The third message says, 'I've selected Inspire Energy Holdings (SO) as your supplier for this program. Is that okay?'. At the bottom, there is a question 'Did the customer accept supplier?' with a dropdown menu set to 'Yes'.

Typically the customer won't have a particular supplier in mind. When the customer agrees to choose a supplier but doesn't have a preference, you MUST use the round robin function in Concert to select a supplier for the customer. Click the "Next Supplier" button to select a supplier at random, then follow scripting in Concert to ask for their acceptance of that supplier before continuing with enrollment.

Step 3

Supplier Selection - When They Know

The screenshot shows a web form with three main sections. The first section asks a mandatory question: "Do you know the supplier that you would like to select for this program or would you like me to select one from a rotating list?" with a dropdown menu currently set to "Yes". The second section asks "Which supplier would you like?" with a dropdown menu showing "Green Mountain Energy (SO)". The third section contains two mandatory notices: "I have initiated the selection of Green Mountain Energy (SO) as your supplier for the Customer Referral Program." and "Green Mountain Energy (SO) will send detailed documentation to you in the mail within three (3) business days."

If the customer is familiar with Standard Offer Program or otherwise knows which supplier they'd like to choose, simply select the supplier from the drop down menu. Don't see the supplier in the list? Inform the customer that supplier is not currently participating and offer to select a different supplier at random for them. Remind the customer they can change suppliers any time without penalties. They can research suppliers at papowerswitch.com - for FirstEnergy the list is updated every three months.

Step 4

Verify Customer Information

MANDATORY Please confirm your mailing address.

Street Address	117 S Main St
Unit Type	Unit Type ▾
Unit Number	
City	Mansfield
State	Pennsylvania ▾
Zip Code	16933-1523

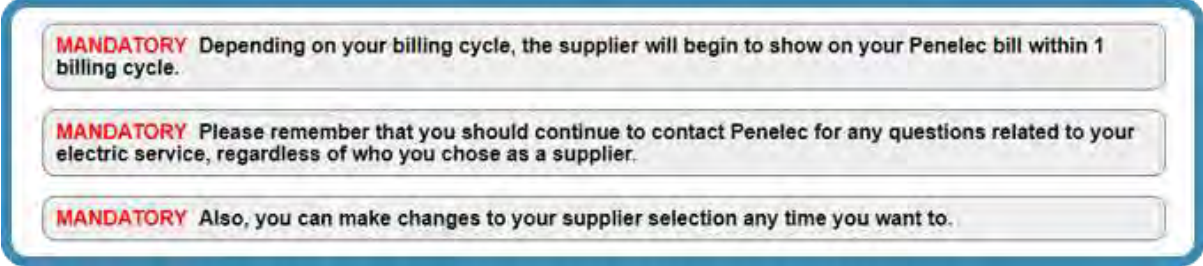
Can you also confirm your email address and best contact number?

Update email and best contact number in Customer Information box.

Even though you've already verified the customer's information at this point in the call, when you're enrolling them in SOP you need to do it again. Verify complete address including ZIP code, email address, and best contact number.

Step 5

Next Steps



MANDATORY Depending on your billing cycle, the supplier will begin to show on your Penelec bill within 1 billing cycle.

MANDATORY Please remember that you should continue to contact Penelec for any questions related to your electric service, regardless of who you chose as a supplier.

MANDATORY Also, you can make changes to your supplier selection any time you want to.

After choosing a supplier and gaining the customer's agreement to use that supplier, simply follow Concert to explain next steps to the customer and give a few final reminders.

Step 6

Frequently Asked Questions

- The customer can always make their choice – go to www.papowerswitch.com for additional information.
- The Customer Referral Program is the same for all participating suppliers.
- If customer asks, "What is changing", tell him that the only items changing will be the supplier of the customer's electricity and a lower price per kilowatt-hour on the bill for 12 months. Everything else will remain the same.
- The Commission wants customers to choose suppliers and believes it will lower costs for consumers over time.
- The participating suppliers are licensed and accredited to be doing business as electric suppliers within the state of Pennsylvania.
- The rate per kilowatt-hour will be the same for 12 billing cycles. The price to compare could fluctuate over time.
- The customer can select another supplier or return to default service at any time – even if the supplier is not participating in the Customer Referral Program.
- There is no cost to switch out of the Customer Referral Program.

Does your customer have a question about the Standard Offer Program? Answer carefully! The green section at the bottom of the order page in Concert includes approved scripting you can use to answer questions and further explain the program to your customer (if needed).

That's All!

Keep it simple! Follow Concert, get permission, and use the FAQs section when you get stuck.



View the entire slideshow before moving on.

That's All!

Keep it simple! Follow Concert, get permission, and use the FAQs section when you get stuck.

Lesson 7 of 8

FAQs and Customer Objections

Customers may find the Standard Offer Program a bit confusing even after you've done a great job explaining how it all works. When customers have questions, it's important to answer those questions accurately.

[Click each point on the graphic](#) to learn more about the most frequent customer questions and how best to respond to them.





"Can I just stay with my current provider?"



This is the most common question you'll hear when offering SOP. You may also hear "I just want to stay with who I have now." Remember to acknowledge the customer's question, educate them on the program, and encourage them to participate.

Play the clip to hear an example of how best to respond to this question.



"What happens if I choose not to participate?"



Participation in the program is completely optional. Remind the customer of the benefits of the program and leave the choice to the customer.

Play the clip to hear an example of how best to respond to this question.



"What happens after the 12 months are up?"



Sometimes customers need some reassurance before they agree to enroll in a program like SOP. Keep things simple – explain next steps to the customer and assure them that the program is low risk and high benefit.


Play the clip to hear an example of how best to respond to this question.



Other FAQs



You have additional resources to help you answer questions about Standard Offer Program! Besides the information in Concert, you can also use the Standard Offer FAQs document. Find the document [HERE](#).

 Click ALL points on the graphic before moving on.

Lesson 8 of 8

Compliance Information

For the most part, you should follow the same compliance guidelines for Standard Offer Program as you do for all other products and services. Check out the information below to learn more about Compliance Do's and Don'ts for Standard Offer Program.

1



DON'T Recommend a Supplier

Making a recommendation or otherwise influencing the customer's decision in selecting a supplier is an Elevated Risk occurrence. Examples include:

- Telling the customer not to use a specific supplier

- Failing to use the round-robin process if the customer chooses to have a supplier randomly selected
- Qualifying a supplier (i.e. "This supplier is greenest/least popular/most popular, etc.)
- Giving an opinion on which supplier most customers choose



What if a customer ASKS you which supplier they should go with?

When this happens, you still have to remain unbiased and not recommend a specific supplier. You can say something like:

"All suppliers honor the same rate. More research can be found at www.papowerswitch.com . I can randomly select a supplier now, and you can change suppliers at any time with no penalties."

2

DO Follow the Script

Going off script is the number one cause for customer confusion about the Standard Offer Program, and customer confusion presents more opportunities for mistakes to creep into your calls. Use information in Concert or the FAQs document to answer customer questions and educate the customer about SOP. If you're not sure what to say or how to answer a question, ASK.



3



DON'T Force It

Participation in the Standard Offer Program is completely optional. The customer is not required to participate and will not be penalized in any way for choosing not to enroll. Take care not to mislead the customer into thinking they are required to participate in the program.

DO Get Permission

You'll need to get the customer's express permission to enroll them in SOP. You also need their agreement when selecting a supplier. Best practice is to follow the prompts in Concert – READ the mandatory scripting verbatim and WAIT for the customer's response.



CONTINUE

There Isn't Any More

That's all there is to it! Standard Offer Program is a different beast for sure, but it doesn't have to be difficult. If you have any questions or concerns, please feel free to reach out to your training team.

Allconnect Training

Standard Offer Program Refresher

FirstEnergy (FE) and 

WHAT IS DEREGULATION

Deregulated Markets

Deregulation

- In deregulated markets, consumers can choose the supplier for the electric generation portion of their services (the actual electricity)
- Like picking the cell phone plan that best fits your needs, customers can choose the electricity plan that best fits their needs.
- The incumbent utility (█████ & FE) retains control of transmitting and distributing power while power generation and retail service become open to competition.

What is the Simple Choice?

- Simple choice is an Allconnect program whose purpose is to educate customers in PA on electric choice.
- The Standard Offer is a program developed by the PA PUC to encourage customers to shop around to save by switching to a competitive supplier
- The Standard Offer Program:
 - 7% discount off the utilities Price-to-Compare in effect at the time of the enrollment
 - Rate is fixed for 12 months
 - No fees (early termination) or penalties for leaving the program at any time

FirstEnergy Operating Companies in PA

- MetEd
- Penn Power
- Penelec
- West Penn Power

Default Supplier (Utility) vs. Alternate Supplier

- What does “**default supplier**” mean?
 - The utility is the “default supplier” of the electricity until the customer chooses an “**alternate supplier**”.
- Customers do not have to select an alternate supplier and can stay with their utility (██████ or the First Energy operating company (i.e., MetEd)) as their **default supplier**.
 - Customers who do not enroll in the Standard Offer Program will not get the 7% discount off the current Price To Compare (PTC) of their utility.

Don't over-explain this to the customer – keep it simple!!

FE Standard Offer Script

MANDATORY Cameron Lind, there are many registered electric suppliers doing business in the state of Pennsylvania and you have the option of choosing any of them. In an effort to encourage choice, the State Utility Commission has made the Standard Offer program available to you.

MANDATORY The program offer is a 7 % discount off the current Price to Compare that you are paying with Penn Power as your default service supplier. There are no fees for selecting an alternate supplier today or any penalties for changing suppliers before the 12 months are up.

MANDATORY The current Price to Compare rate for Penn Power is 7.593 cents per kilowatt-hour. The rate for this Standard offer is 7.061 cents per kilowatt-hour. The Standard Offer rate may be higher or lower than the price to compare and the percentage savings you will experience compared to Penn Power supplier generation will vary as the price to compare changes. The price to compare changes quarterly in March, June, September and December, however your Standard Offer rate will remain fixed the same for 12 billing cycles and is the same no matter which participating supplier you select.

MANDATORY You can cancel this contract anytime without penalty and select another supplier or return to default service with Penn Power for service at the Price To Compare. I can enroll you with an approved supplier of your choice from our list or I can select one for you. Do you have questions?

MANDATORY Do you agree to be enrolled with a supplier for this program?

Yes

Read the amount as
written, do not round

FE Standard Offer Script

MANDATORY Do you know the supplier that you would like to select for this program or would you like me to select one from a rotating list?

MANDATORY I can select a supplier for you from a rotating list.

Next Supplier

MANDATORY I've selected Tomorrow Energy (SO) as your supplier for this program. Is that okay?

Did the customer accept supplier?

MANDATORY I have initiated the selection of Tomorrow Energy (SO) as your supplier for the Customer Referral Program.

MANDATORY Tomorrow Energy (SO) will send detailed documentation to you in the mail within three (3) business days.

MANDATORY Please confirm your mailing address.

Info in Concert for Both FE &

- The customer can always make their choice – go to www.papowerswitch.com for additional information.
- The Standard Offer Program is the same for all participating suppliers.
- If customer asks, "What is changing," tell him that the only items changing will be the supplier of the customer's electricity and a lower price per kilowatt-hour on the bill for 12 months. Everything else will remain the same.
- The Commission wants customers to choose suppliers and believes it will lower costs for consumers over time.
- The participating suppliers are licensed and accredited to be doing business as electric suppliers within the state of Pennsylvania.
- The rate per kilowatt-hour will be the same for 12 billing cycles. The price to compare could fluctuate over time.
- The customer can select another supplier or return to default service at any time – even if the supplier is not participating in the Standard Offer Program.
- There is no cost to switch out of the Standard Offer Program.

Forward >

Most Common Objection

- *Can't I just stay with [REDACTED]/FirstEnergy? Or I want to stay with [REDACTED]/FirstEnergy*
- The right and concise answer to this question:
 - ▶ *Yes, you can stay with [REDACTED]/FirstEnergy as your default service supplier. However, by staying with them as your default supplier, you won't be able to take advantage of the 7% discount program. By enrolling today, you will save 7% off the electric generation portion of the bill you receive from [REDACTED]/FirstEnergy.*

What if customer still doesn't want to enroll

- Do not continue to try to “sell” the customer on the program
- Notate Concert appropriately that the customer does not want to enroll in the Standard Offer Program

MANDATORY Mr Mover W Denne, without knowing a supplier or agreeing to have one randomly selected, you will remain with your current default supplier. If you do find a supplier or would like us to choose one for you, please call Duquesne Light and reference the Standard Offer Program and you will be routed back to us.

- Move on to the home services portion of the call.

What happens if I enroll a customer and they change their mind?

- Remind customers there are no fees to cancel out of the program at any time.
- Customer needs to wait until they receive their enrollment information from the supplier; then they can call the supplier to cancel

This can be considered “Slamming” - Ensure customers understand the program before you complete the enrollment in Concert

THE BOTTOM LINE

Why is it important to review all the information in the SOP script for FirstEnergy and [REDACTED]?

-
- The Standard Offer program is a mandated program required by the PA PUC. FE and [REDACTED] are **required** to provide the customer with the terms and conditions of the program as well as the disclosures.
 - The script is intended to provide the customer with enough information to make an informed decision, understand the offer, and overall create a better customer experience.
 - There is a 3-page FAQ document which you should be able to access via Concert

Where is Standard Offer Program on PApowerswitch.com

The screenshot shows a web browser window with the address bar displaying www.papowerswitch.com/standard-offer-program. The website header includes the PApowerSwitch logo and the text "Pennsylvania Public Utility Commission". A navigation menu contains links for "Home", "Switching Power", "Shop For Electricity", "Fixed & Variable", and "Your Rights & Protections". The main content area is titled "Standard Offer Program" and contains the following text:

Pennsylvania electric distribution companies (EDCs) may be able to offer are now offering residential and small business customers a choice to participate in a voluntary electric shopping program known as The Standard Offer Customer Referral Program. Through this program, EDCs make available a standard offer to all residential and small business customers who have not shopped their electric generation with a competitive supplier, as well as customers who have already shopped yet inquire about the program. Depending upon market conditions, Standard Offer may not always be available in certain areas. Only EDCs that have competitive suppliers actively participating in Standard Offer at a given time can refer customers to the program.

Under the Standard Offer Program, EDCs refer certain customers calling the utility (such as those with high bill complaints) to a randomly selected retail electric supplier participating in the program. The supplier, or a third party acting on behalf of the supplier, must offer the customer a standard 7% discount versus the EDC's currently effective Price-to-Compare (PTC), with such rate **fixed for 12 months**.

EXAMPLE: If an EDC's current PTC is 10 cents per kilowatt hour (kWh), then the customer could enroll in the Standard Offer Program at 9.3 cents per kWh – a 7% discount off the PTC with the rate remaining fixed at that price for 12 months.

Terms and conditions of the standard offer are presented to customers before they decide to enter the program. The standard offer and its 12-month term are uniform for all customers within a rate class, within an EDC's service territory. **Customers who enroll with a participating supplier are free to leave the Standard Offer Program at any time during the 12 months with no termination/cancellation fee imposed.**

All existing customer notification requirements apply, including notices relating to any proposed changes in the contract between the supplier and customer. Customers will receive contract renewal notices prior to the end of the standard offer period. At that time, they have three options:

- Remain with their current supplier.

- <http://www.papowerswitch.com/standard-offer-program>

1. Customers and agents can find information on the Standard Offer Program at:
<http://www.papowerswitch.com/standard-offer-program>
2. Customers do not have to select an alternate supplier and can stay with their utility ([REDACTED]) or the First Energy operating company (i.e., MetEd)) as their default supplier.
 - a. Customers who do not enroll in the Standard Offer Program will not get the 7% discount off of the current Price To Compare (PTC) of their utility.
3. Can't I just stay with my utility?
 - a. Yes, you can stay with FirstEnergy/[REDACTED] as your default service provider. However, by staying with them as your default service provider, you won't be able to take advantage of the 7% discount program. By enrolling today, you will save 7% off the electric generation portion of the bill you receive from FirstEnergy/[REDACTED]. They will still take care of everything else as they are today.
4. My electric utility has always been a good company. Why should I switch now?
 - a. Electric utilities are encouraging customers to shop around because you may be able to save money by switching to a competitive supplier. Regardless of whether you choose a different supplier, your electric utility will continue to deliver your electricity, provide reliable service, and respond to outage problems.
5. Why would FirstEnergy/[REDACTED] want customers to participate in this plan? What's in it for them?
 - a. It is mandated by the Pennsylvania Public Utility Commission that the utilities make customers aware they have the option to shop and that they must also make customers aware of the Standard Offer Program.
 - b. FirstEnergy/[REDACTED] do not make a profit on the electric generation portion of the bill. They pass these charges onto the customer – the customer pays what FirstEnergy/[REDACTED] pay for the generation portion of the bill. This is known as the Price to Compare (PTC).
 - c. Therefore, they don't have an opinion one way or the other if the customer wants to shop to save money on this portion of their bill. FirstEnergy/[REDACTED] is responsible for safely and reliability delivery the electricity to the customer's home or business.
6. If I choose a new electric supplier, what part of my service will change?
 - a. When you shop for an electric supplier, you are choosing the company that generates your electricity. The electric utility that distributes your electricity will remain the same. You will see the discount on the electric generation portion of your bill.
7. If the customer says that the rate for the generation charges on their bill is lower than the PTC or the discounted rate,

- a. Explain: The program is **7% discount** from the utility's Price To Compare (**PTC**) on the date the standard offer was made. As the Price to Compare changes, your percentage of savings will vary. Your rate may be higher or lower than the Price to Compare in future months.
8. When will I see the discount rate on my bill?
 - a. The switch to the supplier is effective upon receipt of the enrollment transaction from the supplier and will be reflected on your account within the first billing cycle.
 9. The PTC changes quarterly on the first day of March, June, September and December for FirstEnergy and on the first day of June and December for [REDACTED].
 10. Standard Offer Program rate is fixed at 7% off the PTC at the time the customer enrolls and remains the same for 12 billing cycles.
 - a. Because the PTC can increase or decrease quarterly or semi-annually and the standard offer plan rate stays the same for 12 billing cycles, the customer's percentage of savings will vary as the PTC changes.

EXAMPLE: Customer enrolls on June 15 when the PTC is 8.25 cents per kWh and the 7% discounted price is 7.67 cents per kWh. On September 1, the PTC goes to 8.90 cents per kWh. The customer is still billed at 7.67 cents per kWh which then makes their percent of savings 13.8% instead of 7%.

- i. The reverse could happen and the PTC could go lower in the subsequent quarter making the percent of savings lower than 7%.
- ii. EXAMPLE: Customer enrolls on June 15 when the PTC is 8.25 cents per kWh and the 7% discounted price is 7.67 cents per kWh. On September 1, the PTC goes to 8.00 cents per kWh. The customer is still billed at 7.67 cents per kWh which then makes their percent of savings 4.1% instead of 7%.
- iii. The PTC could also go lower than the rate the customer is paying on the Standard Offer plan (i.e., the next quarterly PTC rate could go to 7.25 cents and the customer enrolled in a standard offer plan at a discounted rate of 7.67 cents.

Customers can always call back and re-enroll in the standard offer program at the lower rate.

11. What communication/information will the customer receive after the Standard Offer Program referral is received by the supplier?
- a. Within a few days of the referral for a non-mover and within a few days of the start of service for a mover, they will receive a letter from the utility and a letter from the supplier.
 - b. The letter from the utility is simple and straightforward informing the customer which supplier the enrollment was received.
 - c. The letter from the supplier will contain the terms and conditions of the enrollment in the Standard Offer Program. It will also contain the contact information of the supplier and the customer can contact them with any questions.
12. What happens at the end of the standard offer period?
- a. Customers who enroll with a participating supplier are free to leave the Standard Offer Program at any time during the 12 months with no termination/cancellation fee imposed.
 - b. All existing customer notification requirements apply, including notices relating to any proposed changes in the contract between the supplier and customer. Customers will receive contract renewal notices, from their supplier, prior to the end of the standard offer period. At that time, they have four options:
 - Remain with their current supplier at the new rate;
 - Re-enroll in the standard offer program, if still available;
 - Switch to another competitive supplier of their choice; or
 - Return to default service offered by their EDC.
 - c. If a customer fails to respond with one of these options, they will automatically remain with the **current supplier on a month-to-month basis on a variable rate plan.**

ME/PN/PP/WP Response to OCA Interrogatory Set I, No. 10

Witness: J.M. Savage

Page 1 of 1

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

OFFICE OF CONSUMER ADVOCATE Set I, No. 10

“With regard to the Referral Program, please provide the following data for each EDC for each month since June 2019 and for each month during the pendency of this proceeding:

- a. Number of referrals made by FirstEnergy’s customer service representatives;
- b. Number of calls handled by the Customer Referral Program Team;
- c. Number of customers by customer class who enrolled in the Referral program;
- d. The applicable PTC and Referral contract price; and
- e. Number of participating EGSs;”

RESPONSE:

- a. See ME/PN/PP/WP Response to OCA Interrogatory Set 1, No. 10 Attachment A for the number of referrals made by the Companies’ customer service representatives for each month since June 2019.
- b. See ME/PN/PP/WP Response to OCA Interrogatory Set 1, No. 10 Attachment B for the number of calls handled by the Customer Referral Program Team for each month since June 2019. The difference in the number of referrals made by the Companies’ customer service representatives and calls handled by the Customer Referral Program Team is attributable to customer disconnections after the transfer of the call.
- c., d. and e. See ME/PN/PP/WP Response to OCA Interrogatory Set 1, No. 10 Attachment C for the number of customers by customer class who enrolled in the Referral program, the applicable PTC and Referral contract price, and the number of participating EGSs for each month since June 2019.

a. Referrals made by the Companies' Customer Service Representatives													
2019	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
ME						4,712	5,038	5,038	4,704	5,294	4,405	4,188	33,379
PN						4,409	5,305	5,532	4,586	5,225	4,173	3,863	33,093
PP						1,234	1,360	1,262	1,243	1,318	1,071	1,025	8,513
WP						4,747	6,234	6,834	4,826	5,334	4,183	3,945	36,103
Total						15,102	17,937	18,666	15,359	17,171	13,832	13,021	111,088
2020	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
ME	3,941	3,896	4,403	3,117	2,967	3,145	4,578	4,350	4,127	4,299	3,582	3,799	46,204
PN	3,626	3,324	3,693	3,111	3,218	3,305	4,615	4,492	3,842	4,109	3,203	3,293	43,831
PP	954	988	1,044	911	791	1,098	1,313	1,241	1,085	1,093	870	928	12,316
WP	3,989	3,565	4,036	3,150	3,177	3,525	5,809	5,954	4,213	4,374	3,465	3,663	48,920
Total	12,510	11,773	13,176	10,289	10,153	11,073	16,315	16,037	13,267	13,875	11,120	11,683	151,271
2021	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
ME	3,322	3,005	4,152	3,906	3,907	4,573	4,166	4,374	3,088	3,223	3,173	3,103	43,992
PN	2,934	2,853	3,751	3,856	3,865	4,419	4,318	4,476	3,083	3,176	2,979	2,791	42,501
PP	783	843	1,034	1,048	989	1,223	1,163	1,113	817	870	796	786	11,465
WP	3,197	3,105	4,121	3,986	3,964	4,925	5,135	5,833	3,186	3,416	3,080	3,018	46,966
Total	10,236	9,806	13,058	12,796	12,725	15,140	14,782	15,796	10,174	10,685	10,028	9,698	144,924

PA Calls Handled by AllConnect													
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2019						6,514	7,254	6,395	6,118	6,365	4,571	5,048	42,265
2020	6,938	6,496	6,486	5,689	5,726	6,176	9,099	8,895	6,513	5,363	4,463	4,803	76,647
2021	4,148	4,364	5,483	5,290	5,167	5,424	5,097	8,277	5,304	5,561	5,405	5,164	64,684

*AllConnect is not able to report at the operating company level

183,596

West Penn Power Customer Referral Program Information 2019

	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
# Residential Enrollments	812	911	900	701	765	519	535
# Small Comm. Enrollments	0	0	1	0	0	6	7
# EGSs Serving Residential	5	5	5	6	6	6	9
# EGSs Serving Small Comm.	3	3	3	3	3	3	3
Residential Standard Offer Rate (¢/kWh)	\$0.05131	\$0.05131	\$0.05131	\$0.04964	\$0.04964	\$0.04964	\$0.05357
Small Comm. Standard Offer Rate (¢/kWh)	\$0.05148	\$0.05148	\$0.05148	\$0.05320	\$0.05320	\$0.05320	\$0.05321

5,143

West Penn Power Customer Referral Program Information 2020

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
# Residential Enrollments	568	545	606	447	464	497	681	943	538	402	282	278
# Small Comm. Enrollments	9	5	10	6	5	7	7	1	1	1	3	2
# EGSs Serving Residential	9	9	11	11	11	10	10	10	9	9	9	7
# EGSs Serving Small Comm.	3	3	3	3	3	5	5	5	2	2	2	1
Residential Standard Offer Rate (¢/kWh)	\$0.05357	\$0.05357	\$0.05242	\$0.05242	\$0.05242	\$0.04766	\$0.04766	\$0.04766	\$0.04549	\$0.04549	\$0.04549	\$0.04834
Small Comm. Standard Offer Rate (¢/kWh)	\$0.05321	\$0.05321	\$0.05440	\$0.05440	\$0.05440	\$0.05210	\$0.05210	\$0.05210	\$0.04877	\$0.04877	\$0.04877	\$0.05304

West Penn Power Customer Referral Program Information 2021

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21
# Residential Enrollments	319	368	207	460	545	298	353	645	372	363	288	259
# Small Comm. Enrollments	0	0	0	13	6	13	9	8	8	2	2	6
# EGSs Serving Residential	7	7	4	4	4	7	7	7	7	7	7	2
# EGSs Serving Small Comm.	1	1	2	2	2	2	2	2	1	1	1	1
Residential Standard Offer Rate (¢/kWh)	\$0.04834	\$0.04834	\$0.04793	\$0.04793	\$0.04793	\$0.05308	\$0.05308	\$0.05308	\$0.05066	\$0.05066	\$0.05066	\$0.05299
Small Comm. Standard Offer Rate (¢/kWh)	\$0.05304	\$0.05304	\$0.04532	\$0.04532	\$0.04532	\$0.05699	\$0.05699	\$0.05699	\$0.05264	\$0.05264	\$0.05264	\$0.07076

ME/PN/PP/WP Response to OCA Interrogatory Set I, No. 12

Witness: J.M. Savage

Page 1 of 1

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

OFFICE OF CONSUMER ADVOCATE Set I, No. 12

“Has FirstEnergy done any analysis of the number of Referral customers who terminate their EGS contracts prior to the 12-month term of these contracts and/or any analysis of the prices paid by Referral program customers upon renewal with the Referral program EGS at the end of the 12 month term? If so, provide such analysis. If not, why not?”

RESPONSE:

No, the Companies have not done any analysis on customers who terminate their Customer Referral Program (“CRP”) contracts prior to the 12-month term or of the prices paid by CRP customers upon renewal with the CRP supplier at the end of the 12-month term. The Commission has not required the analyses requested in this question. In addition, the Companies do not have access to electric generation supplier contracts with CRP customers to determine the terms and pricing upon renewal with the CRP supplier.

ME/PN/PP/WP Response to SHIPLEY ENERGY Interrogatory Set I, No. 5

Witness: J. M. Savage

Page 1 of 1

**JOINT PETITION OF METROPOLITAN EDISON COMPANY PENNSYLVANIA
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN
POWER COMPANY FOR APPROVAL OF THEIR DEFAULT SERVICE PROGRAMS
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 5

“Does First Energy offer a discounted rate, such as that provided through the Customer Referral Program, to customers who contact the Companies for reasons other than just setting up new service? For example: a) if a customer calls about high bill complaint; b) a general billing question; c) to set up automatic billing, etc.”

RESPONSE:

Yes. The following call types trigger an offer of the Customer Referral Program to the Companies’ residential and small commercial customers: a billing inquiry, customer choice calls, or during a move-in, for new customers or existing customer for transfers of service.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company, :
Pennsylvania Electric Company, Pennsylvania : Docket No. P-2021-3030012
Power Company, and West Penn Power : Docket No. P-2021-3030013
Company for Approval of their Default Service : Docket No. P-2021-3030014
Programs for the period commencing June : Docket No. P-2021-3030021
1, 2023, through May 31, 2027 :

REBUTTAL TESTIMONY OF HARRY S. GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

March 24, 2022

1 **PREPARED REBUTTAL TESTIMONY OF HARRY S. GELLER**

2 **Q. Please state your name, occupation, and business address.**

3 A. Harry Geller. I am an attorney. Though I am currently retired, I have maintained an office
4 at the Pennsylvania Utility Law Project (PULP), 118 Locust St., Harrisburg, PA 17101 and serve
5 as a consultant to organizations representing the low income and their clients. Since the Governor’s
6 Emergency Order regarding the Covid-19 pandemic, I have been working from 4213 Orchard Hill
7 Rd, Harrisburg, PA, 17110.

8 **Q: Did you submit direct testimony in this proceeding?**

9 A: Yes. My direct testimony was premarked as CAUSE-PA Statement 1.

10 **Q. Please state the purpose of your rebuttal testimony.**

11 A: The purpose of my rebuttal testimony is to respond to aspects of the Direct Testimony of
12 Travis Kavulla on behalf of Retail Energy Supply Association and NRG Energy, Inc.
13 (RESA/NRG). I note that a number of issues raised in Mr. Kavulla’s testimony involve legal
14 questions that are properly reserved for briefing. I will not opine on any issues which are strictly
15 legal in nature, or which otherwise do not require additional factual context or information.

16 Moreover, my silence in response to any witnesses’ direct testimony in this proceeding
17 should not be construed as an agreement therewith. Unless required for context or clarification in
18 providing a further response to other parties’ direct testimony, I will not reiterate the extensive
19 arguments, evidence, and recommendations that I provided in my direct testimony. Rather, to the
20 extent an argument raised by any party was already sufficiently addressed in my direct testimony,
21 I do not intend to respond, and stand firmly on the evaluation, analysis, and recommendations
22 contained in my direct testimony. Nothing proposed by any other witness has changed my initial
23 conclusions or recommendations.

1 **Q: Please provide a brief summary of Mr. Kavulla’s Direct Testimony to which you**
2 **intend to respond.**

3 A: In his testimony, Mr. Kavulla argues broadly that default service is broken, and in need of
4 massive structural reform. As support, he points to the “downward trend” of residential shopping
5 customers between January 2017 and January 2022. He asserts that this downward trend is
6 attributable to “structural flaws in the design of the retail market” – and argues for radical changes
7 to Pennsylvania’s default service model. (RESA/NRG St. 1 at 8-9). Mr. Kavulla offers numerous
8 substantive recommendations, which he discusses throughout the balance of his testimony.

9 First, Mr. Kavulla argues that Electric Distribution Companies (EDCs) should no longer
10 serve as the default service provider. He asserts that a supplier should instead be assigned to act
11 as a “provider of last resort” – similar to the Texas model for electric restructuring. (RESA/NRG
12 St. 1 at 9-14). He recommends that the Commission institute a statewide inquiry to restructure
13 Pennsylvania’s default service model. (RESA/NRG St. 1 at 12).

14 Mr. Kavulla in turn argues that default service costs are not adequately unbundled from
15 transmission and distribution rates, and that additional transmission and distribution costs should
16 be shifted onto default service customers. (RESA/NRG St. 1 at 9, 12, 42-53).

17 He next argues that FirstEnergy’s proposed Time of Use Rate should be mandatory for all
18 default service customers, eliminating the stable, least-cost default service option currently
19 available to residential consumers who choose not to shop in the competitive market. (RESA/NRG
20 at 12, 17-36). He asserts that TOU rates are more reflective of utility costs compared to current
21 default rates, and that approval of a *non*-TOU rate in this proceeding would be unjust and
22 unreasonable. (RESA/NRG St. 1 at 24).

1 Mr. Kavulla also argues that the Commission should reject FirstEnergy’s proposal to
2 transition from a three-month to a six-month default service rate. (RESA/NRG at 12, 55-56). He
3 asserts that shifting to semi-annual rate adjustments will make the default service price less
4 reflective of market conditions, and that consumers would be less likely to sign up for the Customer
5 Referral Program (CRP). (RESA/NRG St. 1 at 55-56). If the Commission were to nevertheless
6 approve a 6-month default service rate adjustment, Mr. Kavulla proposes that the Commission
7 should no longer impose any pricing restrictions for customers enrolled in FirstEnergy’s Customer
8 Assistance Program (CAP). (RESA/NRG St. 1 at 56).

9 Finally, Mr. Kavulla argues for substantial reforms to FirstEnergy’s Customer Referral
10 Program (CRP) – including automatic enrollment of all new customers who have not affirmatively
11 selected a supplier; the development of an online CRP enrollment tool; and the requirement that
12 FirstEnergy actively market CRP to default service customers, both during all customer contacts,
13 and through periodic communications. (RESA/NRG St. 1 at 12, 57-60).

14 **Default Service Restructuring**

15 **Q: Let’s begin with Mr. Kavulla’s overarching concern about a “downward trend” in**
16 **the competitive market, and his recommendation that the Commission explore adoption of**
17 **broad structural changes to default service to push more consumers into the market. How**
18 **do you respond?**

19 **A:** I believe the decline in residential shopping rates noted by Mr. Kavulla is the natural
20 consequence of prolonged excessive pricing, repeated incidents of slamming, and aggressive (and
21 often misleading) marketing in the competitive residential market,¹ leading consumers to make an

¹ See, e.g., Pa. PUC v. Green Mountain Energy Co., Docket No. M-2021-3009235; Pa. PUC v. Greenlight Energy Inc., Docket No. M-2021-3023026; Pa. PUC v. Discount Power, Inc., Docket No. M-2021-3022658; PUC v. Public Power, Docket No. M-2012-2257858; Pa. PUC v. National Gas & Electric, Docket No. M-2020-2637688; Pa. PUC

1 *affirmative choice* to return to or remain on default service - which is their right to do. In other
2 words, the decline in shopping is a problem of the industry's making. The solution to increase the
3 number of shopping customers is not for dramatic and unneeded structural changes that will make
4 default service volatile and pricey, but for suppliers to recognize that consumers have been injured
5 and are understandably skeptical, and that there is a need for suppliers to clean up their own
6 practices.

7 As I explained in direct testimony, FirstEnergy's residential shopping consumers were
8 charged – in the aggregate – approximately \$431 million dollars more than the default service
9 price since August 2017. (CAUSE-PA St. 1 at 7, 9-10 & Exh. 1). In December 2021, low income
10 shopping customers were charged over \$1.1 million more than the default service price *in a single*
11 *month*. (Id. at 13 & Exh. 2). The consequences of excessive pricing in the retail electric market
12 are severe and impact all residential consumers. Residential shopping customers face substantially
13 higher rates of involuntary termination – in turn resulting in substantially higher rates of
14 uncollectible expenses. (Id. at 8, 17-18 & Exh. 4-6). In 2021, 4% of residential shopping customers
15 were involuntarily terminated for non-payment, compared to 2.8% of default service customers.
16 (Id. at 7 & Exh. 6). The disparity is far worse for low income customers enrolled in the Customer
17 Assistance Program (CAP) – with CAP shopping customers reaching a 29.5% termination rate,
18 compared to 8.8% termination rate for CAP customers who remained on default service. (Id.)

v. Eligo Energy PA, LLC, Docket No. M-2020-3019240; Pa. PUC v. Reliant Energy Northeast, LLC d/b/a Reliant Energy, NRG Business Solutions, Reliant-NRG, NRG Residential Solutions, NRG Retail Solutions, NRG Home, and NRG Business, Pa. PUC Docket No. M-2020-3006647; PUC v. MX Energy, Docket No. M-2012-2201861; IDT Energy, Docket No. M-2013-2314312; PUC v. APG&E, Docket No. M-2013-2311811; PUC v. Pa G&E, Docket No. M-2013-2325122; PUC v. ResCom Energy, Docket No. M-2013-2320112; PUC v. IDT Energy, Docket No. C-2014-2427657; PUC v. Hiko Energy, Docket No. C-2014-2427652, C-2014-2431410; PUC v. Blue Pilot Energy, Docket No. C-2014-2427655; PUC v. Energy Service Providers D/B/A PA G & E, Docket No. C-2014-2427656; PUC v. Clearview Electric, Docket No. C-2016-2543592; PUC v. Plymouth Rock Energy, Docket No. C-2016-2579276; PUC v. Respond Power, Docket Nos. C-2014-2427659, C-2014-2438640.

1 Average write-offs for shopping customers are also substantially higher than average write-offs
2 for default service customers – roughly 56% higher for residential shopping customers, and over
3 80% higher for CAP shopping customers. (Id.)

4 Faced with these outcomes, residential shopping customers are *choosing* to remain on or
5 return to default service rather than engage in the competitive market. This is a rational economic
6 choice. If abuses in the market were to stop, consumers may choose to re-engage in the market at
7 the level they did in earlier years. But the choice to re-engage or not rests solely with consumers
8 and must not be forced through further policy manipulation by making default service more
9 volatile and expensive. Supplier actions have engendered consumer mistrust in the marketplace,
10 and it is up to suppliers to regain that trust by changing their behavior – not by changing the rules
11 of the game by radically restructuring default service, packing additional costs into default service
12 to inflate the price to compare, forcing all default customers into time-varying rates, or mandating
13 participation in FirstEnergy’s CRP.

14 I am informed by counsel for CAUSE-PA that Mr. Kavulla’s recommendations may also
15 contradict multiple provisions of the Choice Act. Those legal issues will be explored by counsel
16 for CAUSE-PA in briefing. But even assuming his proposed market reforms are legal, it is contrary
17 to public policy and good sense to further restructure the provision of default service in the manner
18 that would increase the number of payment troubled consumers, involuntary termination rates, and
19 uncollectible expenses.

1 **Q: You note above that Mr. Kavulla’s first recommendation is for the Commission to**
2 **institute a statewide proceeding(s) into the provision of default service, with the objective of**
3 **removing EDCs from the default service role. How do you respond?**

4 A: Mr. Kavulla’s recommendation plainly seeks to relitigate a multi-year Commission
5 investigation into the competitive market, under then-Chairman Powelson in 2013. This
6 proceeding specifically examined potential alternatives for default service and determined that
7 action by the general assembly would be necessary to amend the Choice Act prior to being able to
8 further any recommendations regarding the wholesale removal of EDCs from the default service
9 provider (DSP) role.² After thousands of pages of comments, multiple working groups, and public
10 hearings on the matter, the Commission retained its existing regulations governing the selection of
11 an alternative DSP.³ Those regulations remain effective today, and provide clear parameters for
12 establishing a new DSP in a given utility service territory.⁴ In light of this established regulatory
13 process for identifying a new DSP, the investment of additional time and resources into yet another
14 statewide inquiry to examine alternative default service structures would be an exercise in futility,
15 and would not constitute a just and reasonable expenditure of time and resources for the
16 Commission or for the many stakeholders that would be called upon to engage in such an effort.
17 Any EGS that wishes to perform the function of a default service provider today, may seek to
18 become the default service provider through the regulatory process established for that purpose.

² Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service, Final Order, Docket No. I-2011-2237952, at 20 (Feb. 14, 2013).

³ Id. at 16, 20.

⁴ 52 Pa. Code § 54.183(b)(1)-(3). Notably, the Commission’s regulations permit the Commission to reassign the default service obligation only if “necessary for the accommodation, safety, and convenience of the public.” 52 Pa. Code § 54.183(c). The rule sets forth a clear process and explicit evidentiary standards that a supplier vying to become a DSP must meet as a condition to becoming a DSP. 52 Pa. Code § 54.183(d).

1 **Transmission/Distribution Rate Reallocation**

2 **Q: What was the basis of Mr. Kavulla’s recommendation that the Commission shift**
3 **additional transmission and distribution service costs into default service rates?**

4 A: Mr. Kavulla believes that FirstEnergy is not properly accounting for its overhead and
5 indirect costs to provide default service, and that more of its operational costs should be allocated
6 to default service – rather than being recovered through transmission and distribution base rates.
7 (RESA/NRG St. 1 at 9, 12, 42-53).

8 **Q: Do you agree with Mr. Kavulla’s recommendation?**

9 A: No. And neither does the Commission nor the Commonwealth Court of Pennsylvania,
10 which recently rejected this very same argument in an appeal brought by Mr. Kavulla’s employer,
11 NRG Energy, against the Commission for its decision in PECO’s most recent base rate
12 proceeding.⁵ Mr. Kavulla argues generally that FirstEnergy should include overhead and indirect
13 costs in the default service rate – though, apart from referencing a few generic examples of
14 overhead costs that he thinks should be included in default service rates, he does not provide a
15 proposed cost reallocation or indicate the exact amount or percentage of those costs that should be
16 reallocated. (RESA/NRG St. 1 at 47-48). Instead, he rests on a generic recommendation that the
17 Commission institute a statewide inquiry into the matter – sidestepping the burden of producing

⁵ NRG Energy, Inc. v. Pa. PUC, 58 CD 2019 (Pa. Commw. Ct., filed June 2, 2020) (denying NRG’s proposal to reallocate \$100 million from PECO’s distribution rates to its default service rate). Suppliers have raised these same arguments across multiple dockets. See Petition of PPL Electric Utilities Corp. for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Christopher Kallaher on Behalf of Interstate Gas Supply, Shipley Choice, NRG Energy, Vistra Energy, Engie Resources, WGL Energy Services, and Direct Energy, Pa. PUC Docket No. P-2020-3019356 (served June 25, 2020); Petition of PECO Energy Co. for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Travis Kavulla, Pa. PUC Docket No. P-2020-3019290 (served June 16, 2020); Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Testimony of Christopher Kallaher on Behalf of Interstate Gas Supply, Shipley Choice, NRG Energy, Vistra Energy, Engie Resources, WGL Energy Services, and Direct Energy, Pa. PUC Docket No. P-2020-3019522 (served July 17, 2020).

1 evidence in this proceeding to support his broad claims of “persistent cross-subsidization” between
2 transmission, distribution, and default service rates. (RESA/NRG St. 1 at 9, 42-53).

3 Tellingly, Mr. Kavulla’s recommendation to shift costs from transmission and distribution
4 rates into default service rates is conditional and applies only if the Commission “retain(s) the
5 existing structure with EDCs in this [default service] role.” (RESA/NRG St. 1 at 12, 45). In other
6 words, Mr. Kavulla implicitly recognizes that utilities will continue to incur the costs he seeks to
7 shift into default service – even if the utility is no longer serving in the default service provider
8 role. If FirstEnergy incurs costs, regardless of whether it provides default service, then I do not see
9 how default service customers are causing those costs. As the Commission has previously
10 concluded, Mr. Kavulla’s proposal to shift transmission and distribution costs into default service
11 rates is misaligned with cost causation principles and should not be approved.⁶

12 Ultimately, RESA and NRG’s long running and recurring argument for reallocation of
13 transmission and distribution costs, if approved in the context of this or some other proceeding,
14 would inflate the cost of default service - forcing more residential consumers into the competitive
15 market, even if they would prefer not to engage, and obfuscating the ability of consumers to
16 compare offers against a stable price developed by least cost purchases over time.

17 **Q: Should the Commission open a statewide proceeding to reinvestigate appropriate**
18 **cost-allocation of distribution, transmission, and default service?**

19 **A:** No. As above, the Commission has already expended substantial resources in reviewing
20 the appropriate allocation of costs across distribution, transmission, and default service rates.⁷ It

⁶ *NRG Energy, Inc. v. Pa. PUC*, 58 CD 2019, at 32-33 (Pa. Commw. Ct., filed June 2, 2020).

⁷ In its 2013 Order, after extensive investigation, the Commission determined that cost allocation issues should be addressed in the context of distribution rate proceedings. Investigation of Pennsylvania’s Retail Electric Market: End State of Default Service, Docket No. I-2011-2237952 (order entered Feb. 15, 2013). The Commission subsequently reviewed and approved the justness and reasonableness of FirstEnergy’s cost allocation in the context of FirstEnergy’s

1 would be a waste of Commission resources, and the resources of a host of interested stakeholders,
2 to engage in further inquiry of this question. Moreover, even if such an inquiry were warranted,
3 the allocation of costs between transmission, distribution, and generation is more properly
4 addressed in the context of a utility base rate proceeding, where the overall cost of service and the
5 reasonableness of various expenditures is closely examined by the Commission and interested
6 stakeholders.

7 Time of Use Rates

8 **Q: Mr. Kavulla’s next recommendation was for the Commission to require all default**
9 **service customers to be enrolled in FirstEnergy’s proposed Time of Use Rate. Please explain.**

10 A: Rather than permit consumers the *option* to enroll in FirstEnergy’s proposed Time of Use
11 (TOU) rate, as FirstEnergy has proposed, Mr. Kavulla argues for a dramatic paradigm shift which
12 would direct TOU rates be mandatory for all default service customers. (RESA/NRG St. 1 at 12,
13 17-36). He argues that time-varying rates are more reflective of “underlying market-price
14 dynamics” and should therefore be the “default” product for all consumers. (RESA/NRG St. 1 at
15 20). He explains that a shift to mandatory time-varying usage rates would support electric vehicle
16 adoption – which he submits will “provide cost savings to customers who elect the TOU Rate and
17 charge their EVs during the overnight low-priced energy hours.” (RESA/NRG St. 1 at 21).
18 Notably, Mr. Kavulla provides no bill impact analysis for customers at various usage rates, nor
19 does he demonstrate the impact that such a dramatic shift in default service rate design would have
20 on default service customers with little or no discretionary usage.

21 Mr. Kavulla goes on to argue that it would be *unjust* and *unreasonable* to approve standard,
22 non-varying default service rates. (RESA/NRG St. 1 at 24). He advances three reasons for this

2016 distribution rate proceeding. Pa. PUC v. MetEd, Penelec, Penn Power & West Penn Power, Docket Nos. R-2016-2537349, R-2016-2537352, R-2016-2537355, R-2016-2537359 (final order issued Jan. 19, 2017).

1 conclusion. First, he argues that standard default service rates are less reflective of actual costs.
2 Second, he argues that, because smart meter technology *allows* for the imposition of time-varying
3 usage rates, it is therefore unreasonable to not *mandate* the use of that functionality. (RESA/NRG
4 St. 1 at 24). And third, he suggests that the experience with time-varying usage rates in just three
5 other jurisdictions (namely, Michigan, California, and Ontario, Canada) necessarily means it is not
6 reasonable to approve the continuation of non-varying default service rates in Pennsylvania.
7 (RESA/NRG St. 1 at 24).

8 Finally, Mr. Kavulla argues that the provision of TOU rates to default service customers
9 hampers development of TOU rates in the competitive market and argues that FirstEnergy should
10 revise its bill to provide more space for suppliers to display time-varying usage rates. (RESA/NRG
11 St. 1 at 32-33). He further expands on these recommendations to fully restructure FirstEnergy's
12 DSP and default service rate design to also advocate for approval of Supplier Consolidated Billing
13 (RESA/NRG St. 1 at 30-32) – a convention that would allow for suppliers to issue a single bill that
14 includes all utility and supplier charges. Noting the Commission's repeated rejection of SCB, he
15 nevertheless submits that continued rejection of SCB will impose "several harms." (RESA/NRG
16 St. 1 at 33-34).

17 **Q: What is your response to Mr. Kavulla's recommendation that TOU rates be**
18 **mandatory for all default service customers?**

19 A: I am strongly opposed to Mr. Kavulla's recommendation. In my direct testimony, I
20 explained that time varying usage rates can be costly for low income households and other
21 uniquely vulnerable groups – including Seniors, individuals with a disability or chronic health
22 condition, and families with young children - who lack discretionary usage or are otherwise unable
23 to shift their energy usage to off-peak hours. (CAUSE-PA St. 1 at 40-44). Mandating TOU rates

1 for all residential default service customers will increase energy costs for consumers who are least
2 able to afford service and should not be approved.

3 Mr. Kavulla's justification for requiring TOU rates for all default service customers relies
4 on a view of rate design which fails to reflect the Choice Act's clear direction that customers be
5 able to continue to receive and maintain service that is affordable, safe, and reliable. Approved
6 rate designs must balance interests to produce just and reasonable rates for service, *in furtherance*
7 *of the public interest*. It is in the public interest to ensure default rates are designed to ensure that
8 low income consumers with chronic conditions or acute medical conditions are not forced to curtail
9 use of electronic medical equipment – like oxygen or ventilator machines – during peak hours. It
10 is likewise in the public interest to ensure that Seniors, the infirm, and families with small children
11 can afford to run their heating and cooling systems during the daytime and evening hours. And it
12 is in the public interest to ensure that low income households do not have to unplug their
13 refrigerator or other needed appliances for several hours each day because they are otherwise
14 unable to shift any usage to off-peak hours in order to avoid spikes in their energy bill. Mr.
15 Kavulla's recommendation to mandate time-varying rates for all default service customers is not
16 just, reasonable, or in the public interest, as it fails to account for the distinct likelihood of serious
17 and severe consequences to low income consumers and other vulnerable consumer groups.

18 I also strongly disagree with Mr. Kavulla's assertion that the mere existence of smart
19 meters demands adoption of mandatory time-varying usage rates – and that approval of standard,
20 non-varying default service rates would be unjust and unreasonable. (RESA/NRG St. 1 at 24).
21 Given the potential for severe negative financial and health consequences of time-varying usage
22 rates on vulnerable customer groups, discussed above and in my direct testimony, it would be

1 unjust, unreasonable, and contrary to the public interest to approve time varying usage rates merely
2 because the technology allows such rates to be charged. (See CAUSE-PA St. 1 at 40-44).

3 **Q: Mr. Kavulla argues that consumers could simply turn to the competitive market if**
4 **they do not want to accept the default TOU rate option (RESA/NRG St. 1 at 29). How do**
5 **you respond?**

6 A: Many consumers affirmatively *choose* not to shop – which is their right under the Choice
7 Act. But Mr. Kavulla’s recommendation would effectively deprive many low income consumers
8 of that right – infusing volatility into default service rates, and forcing those who cannot shift their
9 usage to off-peak hours to seek alternative rates in the market.

10 As I explained at length in my direct testimony, residential consumers who shop for
11 electricity in the competitive market have lost hundreds of millions of dollars since August 2017.
12 (CAUSE-PA St. 1 at 9-23). On a per-customer basis in 2021, residential shopping customers
13 across FirstEnergy’s four Companies paid between \$244.37 and \$352.32 more than the default
14 service price – amounting to an average price premium exceeding \$20 *each month*. (CAUSE-PA
15 St. 1 at 11, T.2 & Exh. 1). For confirmed low income shopping customers, the results are even
16 worse. In December 2021, FirstEnergy’s confirmed low income shopping customers paid between
17 \$46.17 and \$60.71 more than the applicable default service price *in a single month*. (CAUSE-PA
18 St. 1 at 22, T.7 & Exh. 2). As a result of these excessive prices in the competitive market, residential
19 shopping customers are experiencing significantly higher rates of involuntary termination and
20 average write-offs for shopping accounts are substantially higher than the average write-offs for
21 default service accounts. (CAUSE-PA St. 1 at 17-18, 20-21 & Exh. 4-6). Forcing consumers into
22 a market that has produced these disturbing outcomes is both unjust and unreasonable and does
23 not align with the Commission’s statutory mandate to ensure that the policies, protections, and

1 program services to ensure low income customers can maintain service to their home remain
2 undiminished.⁸

3 I note that Mr. Kavulla concludes in his testimony that his recommendation to mandate
4 TOU rates for default service customers does not violate the Choice Act. (RESA/NRG St 1 at 22).
5 I am advised by counsel that this legal issue will be explored through briefing.

6 **Q: Above, you explained that Mr. Kavulla relies on orders in Michigan and California**
7 **as support for his position that it would be *unjust* and *unreasonable* to approve standard**
8 **(non-TOU) default rates in this proceeding. How do you respond?**

9 A: Mr. Kavulla’s reliance on orders in Michigan and California to support his
10 recommendation for adoption of mandatory TOU rates for default service customers in
11 Pennsylvania should be disregarded, as the circumstances in those states are not comparable to Mr.
12 Kavulla’s sweeping recommendation.

13 First, his discussion of an order issued by the Michigan Public Service Commission
14 (MPSC) in May, 2020, requiring DTE Electric to implement TOU pricing by 2023 is not
15 comparable to the expansive mandatory default TOU rate proposed by Mr. Kavulla in this
16 proceeding. My review of this docket suggests that the TOU rate approved by MPSC included
17 only “a summer on-peak rate for capacity and non-capacity charges” – not a year-round TOU rate
18 contemplated here.⁹ DTE’s implementation included a lengthy transition period and consumer
19 education plan – including a year-long pilot period to “test multiple enrollment strategies, customer

⁸ 66 Pa. C.S. §§ 2802(10), 2803, 2804(9).

⁹ In the Matter of the Application of DTE Electric Company for Approval of Its Advanced Customer Pricing Pilots, MPSC Docket No. U-20602 (order entered Feb. 4, 2021); In the Matter of the Application of DTE Electric Company for Approval of Its Advanced Customer Pricing Pilots, MPSC Docket No. U-20602 (order entered Sept. 26, 2019); see also In the Matter of the Application of DTE Electric Company for Authority to Increase Its Rates, Amend Its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority, MPSC Docket No. U-18255, at 79-82 (order entered April 18, 2018).

1 messaging and education approaches, and new tools designed to help customers understand and
2 leverage [TOU] rates to manage their usage.”¹⁰ Unlike Mr. Kavulla’s proposal in this case,
3 consumers in Michigan would nevertheless retain the ability to elect a standard, non-varying
4 default service rate.¹¹

5 Importantly, DTE sought an extension of time for implementation of the pilot TOU rates
6 based on concerns that, due to COVID-19, “the introduction of a new rate program will cause
7 unnecessary stress and confusion for customers at this time, and because residential usage behavior
8 is currently atypical as a result of the pandemic.”¹² Recognizing the impact of time-varying usage
9 on home-bound individuals and others who cannot reasonably shift usage to off-peak hours, DTE
10 explained that “many customers are home all day and are using energy in uncharacteristic ways”
11 that would lead to “artificial limitation of the ability of customers to leverage the new [time
12 varying] rates.”¹³

13 Mr. Kavulla’s reliance on a 2019 order in California is similarly misplaced. As Mr. Kavulla
14 admits, this order establishes “default” TOU rates – not mandatory TOU rates contemplated in his
15 recommendation. (RESA/NRG St. 1 at 25-26). In other words, consumers in California can still
16 choose to remain on default service at a standard, non-variable rate. He also notes California’s
17 order attempted to minimize price volatility by adopting various consumer protections – including
18 price protections to ensure consumers switching to a time-varying rate would not pay more than
19 the standard default service rate for a full year after enrollment. (RESA/NRG St. 1 at 26, n.60). In

¹⁰ In the Matter of the Application of DTE Electric Company for Approval of Its Advanced Customer Pricing Pilots, MPSC Docket No. U-20602, at 2 (order entered Sept. 26, 2019).

¹¹ Id.

¹² In the Matter of the Application of DTE Electric Company for Approval of Its Advanced Customer Pricing Pilots, MPSC Docket No. U-20602 (order entered Feb. 4, 2021).

¹³ Id.

1 contrast, Mr. Kavulla’s proposal does not include any consumer protections to shield vulnerable
2 consumers from high bills if they are unable to effectively shift their usage to off-peak hours.

3 Ultimately, while I have not had the time to research the details of the Ontario, Canada
4 experiment, in this country, neither Michigan nor California offers a comparable model to support
5 Mr. Kavulla’s TOU recommendations in this proceeding.

6 **Q: You mentioned Mr. Kavulla’s support of Supplier Consolidated Billing (SCB) in the**
7 **context of discussing TOU rates, and his caution that failure to adopt SCB will harm the**
8 **competitive market. Please explain.**

9 A: Mr. Kavulla argues that EGSs should have greater access to customer bills, allowing
10 suppliers greater ability to offer time varying usage rates. (RESA/NRG St 1 at 30). He argues that
11 EGSs are not providing innovative rates because they are limited to four lines of text on the bill.
12 While he acknowledges that EGSs can send a direct (dual) bill to consumers for the generation
13 portion of their bill, he claims that is insufficient – and that, ultimately, the only way EGSs can
14 innovate is if they have control over the full, consolidated electric bill. This concept is known as
15 Supplier Consolidated Billing (SCB). In short, Mr. Kavulla wants EGSs to serve as the pass-
16 through for the EDC’s charges – presumably positioning EGSs to be responsible for billing,
17 collections, and terminations.

18 Mr. Kavulla falls short of recommending adoption of SCB in this proceeding, and instead
19 recommends that FirstEnergy be required “to permit EGSs to display their supply charges in a way
20 that shows the customer the impact of TOU pricing.” (RESA/NRG St. 1 at 32). He suggests that
21 this could be accomplished in tandem with FirstEnergy’s plans to redesign its TOU bill – though
22 he does not provide any further details about the extent of the bill design changes he seeks.

1 **Q: How do you respond to Mr. Kavulla's concerns about SCB, and his recommendation**
2 **related to FirstEnergy's TOU bill?**

3 A: I am concerned about Mr. Kavulla's recommendation to provide additional space on the
4 bill, and I am unclear why a supplier cannot convey time-varying usage charges within the space
5 provided. Space on a residential customer bill is limited and must convey concise information
6 about the charges included on the bill. Mr. Kavulla has not demonstrated why more space is
7 necessary. Suppliers are always free to provide a direct bill to the customer, which could contain
8 as much detail and information as the supplier chooses to include.

9 If the Commission were to nevertheless require FirstEnergy to provide more space for
10 suppliers on the consolidated utility bill, any incremental costs to do so should be borne by
11 suppliers. Given the lack of detail included in Mr. Kavulla's recommendation, I recommend that
12 any changes to FirstEnergy's bill - made by suppliers or others - be vetted through a collaborative
13 process with input from a broad range of stakeholders, including - at a minimum - the parties to
14 this proceeding.

15 With regard to Mr. Kavulla's overarching testimony regarding SCB, I note that Mr.
16 Kavulla's employer, NRG, has pushed for approval of SCB for many years through multiple
17 utility-specific dockets and in the context of a statewide Commission investigation (originally
18 initiated as a result of an NRG Petition) that culminated with multiple days of *en banc* testimony
19 before the five appointed Commissioners.¹⁴ The docket for that proceeding was recently closed,
20 with the Commission noting:

¹⁴ *En Banc* Hearing on Implementation of Supplier Consolidated Billing, Docket No. M-2018-2645254; see also Petition of NRG Energy, Inc. for Implementation of Electric Supplier Consolidated Billing, Joint Motion of Chairman Gladys M. Brown and Commissioner Norman J. Kennard, Docket No. P-2016-2579249 (Jan, 18, 2018); Investigation of Pennsylvania's Retail Electricity Market: Joint Electric Distribution Company-Electric Generation Supplier Bill, Final Order, Docket M-2014-2401345 (order entered May 23, 2014); Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service, Final Order, Docket Mo. I-2011-2237952, at 68 (Feb. 14, 2013).

1 Even after considering the testimony and exhibits presented at the two *en banc*
 2 hearings, and the comments and reply comments, the record still lacks sufficient
 3 detail for the Commission to definitively conclude that implementation of SCB
 4 would be prudent from a public policy perspective or legal under Chapters 14 and
 5 28 of the Code. Outstanding questions, primarily related to consumer protections
 6 and the Commission’s lack of jurisdiction over EGSs under current law, include, but
 7 are not limited to, (1) the legal authority for SCB; (2) the legal authority for EGSs
 8 to bill and collect EDC distribution charges; (3) the legal authority for EGSs to order
 9 termination of a customer’s electric service; (4) how to properly account for EGS
 10 value-added-service charges; and (5) the administration of EGS purchase of
 11 receivables programs.¹⁵
 12

13 As the Commission recognized in closing this statewide inquiry, there are a number of
 14 legal and policy reasons why SCB cannot be approved in Pennsylvania - all of which have been
 15 previously addressed at length in other record proceedings.¹⁶ For the sake of brevity, I will not
 16 reiterate those arguments in detail, though I incorporate CAUSE-PA’s comments and reply
 17 comments in the Commission’s *en banc* SCB investigation by reference herein.¹⁷

18 **Customer Referral Program (CRP)**

19 **Q: Please briefly summarize Mr. Kavulla’s recommendations regarding FirstEnergy’s**
 20 **Customer Referral Program (CRP) to which you wish to respond.**

21 **A:** As I noted above, Mr. Kavulla offers several proposed reforms to FirstEnergy’s CRP.
 22 Similar to the noted decline in overall shopping rates, Mr. Kavulla laments that CRP enrollment
 23 has also declined in recent years. He asserts that CRP is a “risk free way to participate in the
 24 competitive market” that provides consumers “an opportunity to understand the benefits that EGSs

¹⁵ Secretarial Letter, *Closing Docket No. M-2018-2645254, re: Supplier Consolidated Billing, without Further Action* (letter issued June 21, 2021).

¹⁶ *En Banc* Hearing on Implementation of Supplier Consolidated Billing, Joint Comments and Reply Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia, Docket No. M-2018-2645254 (filed May 4, 2018 and Aug. 24, 2018, respectively).

¹⁷ See 52 Pa. Code § 1.33 (Incorporation by reference); 52 Pa. Code § 5.407. Pursuant to section 5.407(a), I have attached a copy of these comments and reply comments hereto as Appendix A and B.

1 offer.” (RESA/NRG St. 1 at 57). He then advances three primary recommendations: (1) that all
2 new customers be automatically enrolled in CRP unless they have already selected a supplier; (2)
3 that FirstEnergy develop an online CRP enrollment option; and (3) that FirstEnergy actively
4 promote CRP during every contact with a consumer and through active outreach and solicitation.

5 **Q: Is CRP a “risk free way to participate in the competitive market”?**

6 A: No. While SOP participants receive a 7% discount off the then-applicable price to
7 compare, that discount can be erased when the price to compare is adjusted. (CAUSE-PA St. 1 at
8 44-45). Whether the consumer receives a net benefit depends on multiple factors, including when
9 the customer enrolls in the program. (*Id.*) CRP participants may also face steep rate hikes at the
10 conclusion of the 12-month program if, for any reason, they fail to take action at the end of the
11 program term. (*Id.* at 47). Thus, while consumers do have the potential to save money through
12 CRP, the program is certainly not “risk free”.

13 **Q: Do you agree with Mr. Kavulla’s recommendation to automatically enroll all new**
14 **customers unless they already selected a supplier?**

15 A: No. Automatically enrolling all new customers in the SOP would be tantamount to
16 slamming and would deprive consumers of their right to choose not to shop for competitive electric
17 service. When CRP is offered, and a customer elects not to accept it, they are making an
18 affirmative choice to remain with their default service provider, and that choice must be honored.
19 Mr. Kavulla minimizes the importance of this choice, concluding that “no reason exists to initially
20 place a customer on default service.” (RESA/NRG St. 1 at 58). But that reason appears to be clear
21 in light of overwhelming data that residential consumers do not fare well in the competitive market
22 – and more often than not end up paying significantly higher rates than they would pay if they
23 remained with default service. (CAUSE-PA St. 1 at 27-31). Many consumers do not want to invest

1 in the time commitment of checking applicable rates and selecting a supplier every three months,
2 as Mr. Kavulla would continue, or even twice a year as FirstEnergy proposes, when the default
3 service price changes – and elect to stay with their default service provider so they can ‘set it and
4 forget it’. This is a valid choice that consumers must be allowed to make.

5 **Q: Do you agree with Mr. Kavulla’s recommendation to require FirstEnergy to permit**
6 **online enrollment in CRP?**

7 A: I continue to believe that FirstEnergy’s CRP should end. (CAUSE-PA St. 1 at 48-49).
8 There is no evidence or data to support a conclusion that the program is providing a financial
9 benefit to consumers or supporting their knowledge about the residential electric market. (Id.)
10 Nevertheless, if CRP is permitted to continue, I am not per se opposed to establishing online
11 enrollment. However, if approved, EGSs should be required to pay for all costs associated with
12 developing an online enrollment option. In turn, the Commission should establish a collaborative
13 process to review the design of the online enrollment process to ensure consumers are fully and
14 appropriately apprised of their rights, obligations, and the risks associated with program
15 participation.

16 **Q: Do you agree with Mr. Kavulla’s recommendation that FirstEnergy actively promote**
17 **CRP during every contact with a consumer and through active outreach and solicitation?**

18 A: No. It is inappropriate to market the CRP to consumers who contact FirstEnergy to resolve
19 certain issues, such as payment arrangement negotiation or to facilitate reconnection following an
20 involuntary shut-off. Consumers in crisis should not be met with offers that could expose them to
21 higher costs – they should be referred to available universal service programs designed to assist
22 low income consumers to connect and maintain service at an affordable rate. Again, after years of
23 CRP implementation, there has never been any qualitative or quantitative analysis of CRP to

1 determine whether CRP is driving any benefits – financial or educational – to consumers. Unless
2 and until FirstEnergy provides evidence that the program provides consumers with a true “risk
3 free” benefit, it should not actively promote the program.

4 **Six-Month Default Service Rate Adjustments**

5 **Q: You noted at the outset of your testimony that Mr. Kavulla opposes FirstEnergy’s**
6 **proposal to move from a three-month (quarterly) to a six-month (semi-annual) default**
7 **service rate adjustment, arguing that “the default service rate should not be designed to**
8 **reduce volatility.” (RESA/NRG St. 1 at 56). How do you respond?**

9 A: Default service rates should provide a stable option to consumers who choose to remain on
10 default service. I note that counsel for CAUSE-PA intends to further explore the legal aspects of
11 this issue through briefing.

12 **Q: If the Commission were to approve FirstEnergy’s proposed semi-annual default**
13 **service rate adjustment, Mr. Kavulla recommends that the Commission eliminate price**
14 **protections for low income customers enrolled in FirstEnergy’s Customer Assistance**
15 **Program – allowing EGSs to charge rates to low income CAP customers that exceed the**
16 **applicable default service price. How do you respond?**

17 A: Mr. Kavulla’s recommendation appears to be a non sequitur – bearing no relation to the
18 reason for the CAP shopping restrictions. Namely, that excessive pricing in the competitive
19 market for low income customers undermines the cost-effectiveness of CAP; exacerbates rate
20 unaffordability and, in turn, results in higher rates of payment trouble and involuntary termination
21 of service for low income consumers; and causes higher programmatic costs and uncollectible
22 expenses – increasing rates for all residential consumers who pay for CAP through rates. (CAUSE-
23 PA St. 1 at 23-40). Whether FirstEnergy’s default service price changes quarterly or semiannually

1 is irrelevant, as these stark financial harms would result regardless of the timeframe for reassessing
2 the applicable default service rate.

3 As I demonstrated in my direct testimony, FirstEnergy's existing CAP shopping
4 restrictions have ultimately failed to stem the underlying issues and stop the ongoing financial
5 harm to low income consumers and other residential ratepayers. I continue to recommend that the
6 Commission put an end to CAP shopping to better preserve the ability of low income consumers
7 to connect and maintain electricity to their home. (CAUSE-PA St. 1 at 24-26, 34-37). Mr.
8 Kavulla's recommendation to allow CAP shopping with no restrictions simply reopens an
9 unlimited flow of low-income and residential ratepayer dollars into the supplier's pockets.

10 **Q: Does this conclude your Rebuttal Testimony?**

11 A: Yes, though I reserve the right to supplement or amend my rebuttal testimony as
12 information continues to become available through discovery in this proceeding.

CAUSE-PA Statement 1-R
APPENDIX A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

En Banc Hearing on Implementation of
Supplier Consolidated Billing

:
:
:
:

Docket No. M-2018-2645254

**JOINT COMMENTS OF
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)**

AND

**THE TENANT UNION REPRESENTATIVE NETWORK AND ACTION ALLIANCE OF
SENIOR CITIZENS OF GREATER PHILADELPHIA (TURN *ET AL.*)**

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), together with the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*) (collectively referred to herein as the Low Income Advocates), file these Comments in response to the Public Utility Commission's (Commission) March 27, 2018 Secretarial Letter. The Low Income Advocates have substantial concerns about the impact of Supplier Consolidated Billing (SCB) on the ability of households to access critical energy services on reasonable terms and conditions and consistent with the laws and regulations of the Commonwealth of Pennsylvania. We appreciate the opportunity to share these concerns with the Commission. The Low Income Advocates submit that the current paradigm of utility-consolidated billing (UCB) with a purchase of receivables program is effective, and levels the playing field for access to the competitive market. We urge the Commission to resist the call to radically depart from the statutorily prescribed billing, collection, and termination standards for essential utility services in Pennsylvania.

CAUSE-PA is a statewide unincorporated association of low-income individuals which advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to moderate- and low-income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families maintain affordable access to utility services and achieve economic independence and family well-being.

The Tenant Union Representative Network (TURN) is a not-for-profit corporation with many low and lower income members. TURN's mission is to advance and defend the rights and interests of tenants and homeless people. TURN's goal is to guarantee that all Philadelphians have

equal access to safe, decent, accessible, and affordable housing. Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance) is a not-for-profit corporation and membership organization whose mission is to advocate on behalf of senior citizens on a wide range of consumer matters vital to seniors, including utility service. As part of advancing the respective interests of tenants and seniors, TURN and Action Alliance advocate on behalf of low and moderate income residential customers of public utilities in Philadelphia in proceedings before the PUC.

On behalf of our clients, we are requesting the opportunity to testify before the Commission *En Banc* at the June 14, 2018 hearing. CAUSE-PA and TURN *et al.* are well-known and respected advocates for Pennsylvania's low income utility consumers, and have first-hand knowledge, experience, and expertise with the intricacies of Chapters 14 and 56; the mandates of the Electricity Generation Customer Choice and Competition Act (Choice Act); and the Universal Service program design in each utility service territory across the state. SCB crosses each of these critical topics, as discussed in further detail below. The Low Income Advocates not only have expertise on this area of law, we also have substantial experience with the impact of these laws, policies, and procedures on low income populations, as well as the ability of the competitive market to serve their unique needs.

II. BACKGROUND

On March 27, 2018, the Commission issued a Secretarial Letter, notifying interested parties that the Commission would hold an *en banc* hearing on Thursday, June 14, 2018 at 1:00 pm, and inviting interested parties to submit comments by May 4, 2018. The stated purpose of the hearing was to address three issues: "(1) whether SCB is legal under the Public Utility Code and Commission regulations; (2) whether SCB is appropriate and in the public interest as a

matter of policy, and (3) whether the benefits of implementing SCB outweigh any costs associated with implementation.”¹

The Secretarial Letter was issued following the Joint Motion of Chairman Gladys M. Brown and Commissioner Norman J. Kennard to Deny the Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing (SCB). NRG’s petition failed because it “lack[ed] sufficient detail to substantiate a definitive determination on both the policy prudence and legality of numerous pivotal issues,” but the Commission nonetheless expressed a desire to better understand the prudence and legality of SCB.²

The Joint Motion recognized that the Commission “has a long history of deliberating SCB,” but noted that the Commission had not squarely addressed the legality³ Indeed, prior to the NRG proceeding, the Commission assessed and rejected SCB as part of its comprehensive Retail Market Investigation, and instead opted to implement revisions to the Utility Consolidated Bill (UCB) to more prominently feature the supplier’s information.⁴ In doing so, the Commission explained:

We believe that [the joint bill] approach offers several advantages over creating an SCB environment at this time. As we have noted, we fully expect that this approach will require fewer resources than would be required to implement an SCB environment. In addition, this approach does not raise the consumer protections concerns expressed by OCA, PULP, PCADV and others, since we are not changing the entity that is billing and collecting from the consumers.⁵

¹ En Banc Hearing on Implementation of Supplier Consolidated Billing, Secretarial Letter, Docket M-2018-2645254 (March 27, 2018).

² Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Joint Motion of Chairman Gladys M. Brown and Commissioner Norman J. Kennard, Docket No. P-2016-2579249 (Jan. 18, 2018).

³ Id.

⁴ Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service, Final Order, Docket No. I-2011-2237952, at 68 (Feb. 14, 2013).

⁵ Id.

Ultimately, changes to the UCB were ordered in May 2014, just four years ago.⁶ To the Low Income Advocates' knowledge, the impact of the changes to UCB have not been evaluated to assess whether the efforts were successful or whether additional, incremental changes may be warranted.

The Low Income Advocates were active in the NRG proceeding, as well as the Commission's Retail Market Investigation and the subsequent Joint Bill proceeding.⁷ We were then, and remain now, strongly opposed the introduction of SCB in Pennsylvania. As we explain at length below, SCB is legally unsound, dangerous for consumers, and unjustifiably costly.

III. COMMENTS

A. Supplier Consolidated Billing is not permitted under the Public Utility Code.

SCB is not authorized by law and directly conflicts with a number of statutory provisions. Significant legislative changes to multiple chapters within the Pennsylvania Public Utility Code would be necessary to allow SCB to proceed in Pennsylvania. These legal barriers pose an insurmountable hurdle for the Commission to act without legislative change. Nevertheless, as discussed in later sections, the Commission should reject SCB notwithstanding the lack of statutory authority, as it is not in the public interest.

⁶ Investigation of Pennsylvania's Retail Electricity Market: Joint Electric Distribution Company – Electric Generation Supplier Bill, Final Order, Docket No. M-2014-2401345 (May 23, 2014).

⁷ See Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Petition to Intervene and Answer of CAUSE-PA, Comments of CAUSE-PA, and Reply Comments of CAUSE-PA, Docket No. P-2016-2579249 (filed Jan. 27, 2017, Jan. 23, 2017, and Feb. 22, 2017, respectfully); Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Comments of TURN et al. and Reply Comments of TURN et al., Docket No. P-2016-2579249 (Jan. 23, 2017 and Feb. 22, 2017, respectfully).

*i. Supplier Consolidated Billing is inconsistent with the mandates of the Electric Generation Customer Choice Act contained in Chapter 28 of the Public Utility Code.*⁸

SCB directly conflicts with explicit provisions of the Electric Generation Customer Choice Act (Choice Act), which requires electric distribution companies (EDCs) to continue performing essential consumer service functions, including billing services. Moreover, SCB would undercut the Commission’s obligation under the Choice Act to ensure that universal service programming is cost-effective, available, and adequately funded to ensure that all consumers, regardless of income, are able to access affordable utility services.⁹ Approval of SCB would, thus, violate multiple provisions of the Choice Act.

First, section 2807(c) speaks directly to the respective billing obligations of EDCs, compared to those of suppliers. While the provision allows for separate (dual) billing, wherein a consumer could choose to receive a bill from both their supplier and their EDC, it otherwise allows EDCs to provide UCB when a consumer does not otherwise elect to receive a dual bill:

Customer billing. – Subject to the right of an end-use customer to choose to receive separate bills from its electric generation supplier, the electric distribution company may be responsible for billing customer for all electric services, consistent with the regulations of the commission, regardless of the identity of the provider of those services.¹⁰

Importantly, use of the term “may” in this section *does not* grant implicit authority for suppliers to also perform consolidated billing functions. Indeed, the section only contemplates two forms of billing: dual billing or UCB. If the legislature intended to allow suppliers to bill for EDC services,

⁸ 66 Pa. C.S. §§ 2801 et seq.

⁹ See 66 Pa. C.S. §§ 2802, 2804, 2807(c)-(d)

¹⁰ 66 Pa. C.S. § 2807(c). In addition, the subsections that follow this mandate set forth other required attributions of customer billing, including mandatory unbundling of all charges: “Customer bills shall contain unbundled charges sufficient to enable the customer to determine the basis for those charges.” 66 Pa. C.S. § 2807(c)(1). As discussed below in subsections A.ii and A.iii, Chapter 14 only applies to “public utilities” – which includes EDCs, but excludes suppliers. Thus, if SCB were to proceed, the Commission would be without authority or oversight to regulate consumer billing to ensure that rates and charges are not bundled.

it could have done so. It did not. Instead, the legislature set forth additional requirements for UCB, including a requirement that if services are provided by an entity other than the EDC, that entity “shall furnish to the electric distribution company billing data sufficient to enable the electric distribution company to bill customers.”¹¹ Again, if the legislature intended to facilitate or otherwise authorize SCB, it could have done so by imposing the same requirement on the EDC to provide billing data to suppliers. The absence of such authority indicates the legislature neither contemplated nor authorized SCB.

The very next provision of the Choice Act – section 2807(d) – further eliminates any doubt about whether SCB may be implicitly authorized under section 2807(c). Indeed, all consumer service functions – which necessarily includes billing, collections, and termination functions – are expressly delegated to EDCs in Section 2807(d):

Consumer protections and customer service. – **The electric distribution company shall continue to provide customer service functions consistent with the regulations of the commission, including meter reading, complaint resolution and collections. Customer services shall, at a minimum, be maintained at the same level of quality under retail competition.**

- (1) The commission shall establish regulations to ensure that an electric company does not change a customer’s electricity supplier without direct oral confirmation from the customer of record or written evidence of the customer’s consent to a change of supplier.
- (2) The commission shall establish regulations to require each electric distribution company, electricity supplier, marketer, aggregator and broker to provide adequate and informed choices regarding the purchase of all electricity services offered by that provider. Information shall be provided to consumers in an understandable format that enables consumers to compare prices and services on a uniform basis.
- (3) Prior to the implementation of any restructuring plan under section 2806 (relating to implementation, pilot programs and performance-based rates), each electric distribution company, in conjunction with the commission, shall implement a consumer education program informing

¹¹ 66 Pa. C.S. § 2807(c)(2).

customers of the changes in the electric utility industry. The program shall provide consumers with information necessary to help them make appropriate choices as to their electric service. The education program shall be subject to the approval by the commission.¹²

These detailed legislative provisions impose a host of very specific obligations on EDCs for billing, education, and other responsibilities to ensure that customers are well informed about the competitive market, but they are silent about similar obligations of suppliers. This silence is telling: EDCs must continue to perform the consumer functions inherent to the billing entity, and the legislature did not contemplate a paradigm which would authorize suppliers to conduct the sensitive functions of billing, collections, and terminations.

Furthermore, section 2807(f) imposes a host of “consumer service functions” of the EDC that are not readily severable from billing functions from the “consumer service functions” otherwise contemplated to remain with the EDC. Consumers naturally contact the billing agent with a broad range of problems, including service quality, charges, collections efforts, privacy concerns, meter issues, termination, and other critical questions or issues a consumer may experience with regard to their utility service. If an EDC were to continue performing all “consumer service functions” – without also fulfilling the billing function – consumers would experience a great deal of confusion, having to overcome significant and frustrating obstacles to reach a resolution of their issues. For example, if a consumer received a termination notice from their EDC, and first contacted their supplier because it is the company who bills them for service, the consumer would be told they must contact the EDC to address the termination issue – adding significant time and frustration to the consumer seeking resolution of a potentially life-threatening termination of utility service.¹³ Such a result would appear to directly violate section

¹² 66 Pa. C.S. § 2807(d) (emphasis added).

¹³ Of course, suppliers are not required to report on or comply with call and response times or dispute handling functions, so their initial call to the supplier could be quite long and protracted.

2807(f), which requires that all consumer service functions “be maintained at the same level of quality under retail competition.”¹⁴

As a matter of statutory construction, the language of the Choice Act is clear and unambiguous, and must be implemented in accordance with this plain meaning.¹⁵ That said, were an ambiguity to arise, the legislative history affirms the General Assembly’s intention that traditional utility customer service functions – including billing - continue to be exercised exclusively by the EDC. When the Choice Act was initially passed, the discussion on the House floor clearly evidenced an intent to require that EDCs – not suppliers – perform all consumer service functions, including billing:

Mr. THOMAS. Thank you. Now, if we can turn to that section on consumer protections, section 2807. You had mentioned earlier that this bill provides the same myriad of protections that exist in the current law. This section seems to imply that there are changes being made to the traditional obligation which existed between utility companies and the customer. Is that correct, or am I interpreting this wrong?

Mrs. DURHAM. The same protections are still in the bill; that is correct.

Mr. THOMAS. So I should not give any credence to this language which says that the traditional obligations are being changed?

Mrs. DURHAM. Mr. Speaker, could you give me specifically the line and page you are referring to?

Mr. THOMAS. Well, I am reading from, I guess, the analysis or out of the pre-session report, and it says that section 2807 changes the traditional obligation-to-serve requirement to an obligation to deliver for the electric distribution companies, and it talks about a modified obligation.

Mrs. DURHAM. Mr. Speaker, the difference is, you are going to have generation and you are going to have transmission and distribution. The consumer will be dealing directly with the transmission and distribution, and that stays the same, and that is also still regulated. And the duty to serve is still there.

Mr. THOMAS. Thank you.¹⁶

¹⁴ 66 Pa. C.S. § 2807(d).

¹⁵ 1 Pa. C.S. §1921(b).

¹⁶ Pa. House Journal, at 2566 (November 25, 1996).

This legislative history demonstrates the intention of the General Assembly to maintain the paradigm wherein the consumer deals “directly” with the EDC, and the EDC continues to uphold its obligations to perform all consumer services functions, including billing.

Finally, as explored more thoroughly below in section B.ii., SCB is inconsistent with the universal service requirements of the Choice Act, and would erode the stability, effectiveness, availability, and cost-effectiveness of universal service programs. The Choice Act, in relevant part, explicitly provides:

Electric service is essential to the health and well-being of residents, to public safety and to orderly economic development, and electric service should be available to all customers on reasonable terms and conditions.¹⁷

The Commonwealth must, at a minimum, continue the protections, policies and services that now assist customers who are low-income to afford electric service.¹⁸

There are certain public purpose costs, including programs for low-income assistance ... which have been implemented and supported by public utilities’ bundled rates. **The public purpose is to be promoted by continuing universal service and energy conservation policies, protections and services**, and full recovery of such costs is to be permitted through a nonbypassable rate mechanism.¹⁹

Programs under this paragraph shall be subject to the administrative oversight of the commission which will ensure that the programs are operated in a cost-effective manner.²⁰

SCB is incompatible with federal and utility universal service programs, and the Commission’s regulations and policies which implement these programs to assist low income households. As addressed in full below, since SCB would erode the accessibility, cost-effectiveness, and funding

¹⁷ 66 Pa. C.S. § 2802(9).

¹⁸ 66 Pa. C.S. § 2802(10) (emphasis added).

¹⁹ 66 Pa. C.S. § 2802(17) (emphasis added).

²⁰ 66 Pa. C.S. § 2804(9).

for universal services and other low-income energy assistance programs, it directly contradicts the provisions of the Choice Act outlined above.

As discussed in further detail in subsection A.iii, the Commission may not delegate the EDC's explicit duties under the Choice Act to a supplier. Doing so would be outside of the Commission's express authority to implement the requirements of the Choice Act, and such an interpretation would not be subject to deference by the Commonwealth Court.

ii. Suppliers are not subject to the critical billing, collections, and termination standards contained in Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations.

Not only does SCB directly conflict with the Choice Act, it also conflicts with critical billing, collections, and termination standards contained in Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations. Under current law, suppliers are not subject to the requirements contained in Chapters 14 and 56. Importantly, as discussed in subsection A.iii below, the Commission cannot cure these legal defects by waiving or otherwise delegating those requirements to suppliers to allow for SCB.

Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations apply only and explicitly to public utilities, not suppliers.²¹ Chapter 14 defines a public utility as:

“Public utility.” Any electric distribution utility, natural gas distribution utility, small natural gas distribution utility, steam heat utility, wastewater utility or water distribution utility in the Commonwealth that is within the jurisdiction of the Pennsylvania Public Utility Commission.²²

Chapter 56 defines a public utility as: “An electric distribution utility, natural gas distribution utility or water distribution utility in this Commonwealth that is within the jurisdiction of the

²¹ 66 Pa. C.S. § 1401 (“This chapter relates to protecting responsible customers of **public utilities.**” (emphasis added)).

²² 66 Pa. C.S. § 1403.

Commission.”²³ The definition contemplates two criteria: (1) that the public utility is a distribution utility, and (2) that a public utility fall within the jurisdiction of the PUC. Suppliers meet neither of those provisions.

Every crucial provision of Chapter 14, and consequently of Chapter 56, is expressly applied to **public utilities**, including:

- Cash Deposits²⁴
- Payment Arrangements²⁵
- Termination of Service²⁶
- Winter Protections²⁷
- Medical Protections²⁸
- Reconnection of Service²⁹
- Surcharge Prohibitions³⁰
- Late Payment Fee Rules³¹
- Consumer Complaint Procedures³²
- Universal Service Referrals³³
- Automatic Meter Reading³⁴
- Reporting Requirements³⁵
- Protections for Victims of Domestic Violence³⁶

These provisions each describe, in detail, the duties, prohibitions, responsibilities, and requirements which apply explicitly – by name – to “public utilities,” not suppliers.

Important to this analysis is the fact that Chapter 14 makes reference to suppliers.³⁷ Thus, the legislature clearly contemplated the competitive market – and suppliers’ role in that market –

²³ 52 Pa. Code § 56.2.

²⁴ 66 Pa. C.S. §§ 1404, 1404(a.1).

²⁵ 66 Pa. C.S. § 1405.

²⁶ 66 Pa. C.S. § 1406.

²⁷ 66 Pa. C.S. § 1406(e).

²⁸ 66 Pa. C.S. § 1406(f).

²⁹ 66 Pa. C.S. 1407(a)-(b).

³⁰ 66 Pa. C.S. § 1408.

³¹ 66 Pa. C.S. § 1409.

³² 66 Pa. C.S. § 1410.

³³ 66 Pa. C.S. § 1410.1.

³⁴ 66 Pa. C.S. § 1411.

³⁵ 66 Pa. C.S. § 1415.

³⁶ 66 Pa. C.S. § 1417; see also 56 Pa. Code Ch. 56, Subchapters L-V.

³⁷ See, e.g., 66 Pa. C.S. § 1403.

in passing Chapter 14, and understood that it could assign the duties therein to suppliers, but nevertheless declined to extend the Chapter to either allow or require suppliers to conduct the sensitive and high-stakes operations of billing, collections, and termination of residential utility consumers.³⁸ As explained in subsection A.iii, this fact is instructive, and prevents the Commission from delegating to suppliers the express duties of the public utilities mandated by Chapter 14.

It would not be appropriate for suppliers to simply refer consumers to call their public utility to address matters covered in Chapter 14. Billing is not a stand-alone consumer function, and cannot be excised from the billing, collections, and termination standards in Chapter 14.

Take, for example, a consumer who is experiencing difficulty making full payment on a SCB. That consumer would naturally call the supplier first in an attempt to work out a resolution because the supplier is the entity listed on their bill. Suppliers' call centers are unregulated, and are not subject to the Commission's quality of service benchmarks and standards or other quality control provisions.³⁹ In fact, there is nothing to prohibit suppliers from taking actions directly contrary to the Commission's standards, failing to appropriately track and survey customer contacts or utilizing the call center to market ancillary goods or services, or otherwise impede in resolution of customer concerns. Under current law, public utilities are required to offer reasonable payment terms to a customer and to refer economically vulnerable customers to universal service programs.⁴⁰ Suppliers have no such obligation. Thus, after facing inadequate and/or inconsistent

³⁸ 66 Pa. C.S. § 1403.

³⁹ See 52 Pa. Code §§ 54-151-.156; see also Pa. PUC, BCS, 2016 Customer Service Performance Report (Aug. 2017), http://www.puc.state.pa.us/General/publications_reports/pdf/Customer_Service_Perform_Rpt2016.pdf. Section 54.151 specifically provides that the purpose of the regulations is to “develop uniform measurement and reporting **to assure that the customer services of the EDCs are maintained, at a minimum, at the same level of quality under retail competition.**” 52 Pa. Code § 54.151 (emphasis added).

⁴⁰ 66 Pa C.S. § 1401.1

customer service, as well as potentially lengthy call wait times, the financially vulnerable consumer may or may not be told to contact the public utility or appropriately advised regarding the availability of dispute procedures under the Commission's regulations. Ultimately, such customer may or may not find an appropriate resolution of their issue with a supplier, and may never be effectively directed under Commission regulations.

Ultimately, if the consumer is not appropriately referred, the public utility would be unable to fulfill its Chapter 14 duties, which include the duty to refer payment troubled consumers to universal service programs and to attempt to collect on debt.⁴¹ Similarly, a customer with grounds for a dispute or complaint may never receive notification of their rights from a supplier.⁴² Under SCB, who would bear the responsibility if a consumer's service is unjustly terminated? If a consumer is never referred to the public utility, would the public utility nonetheless be responsible for failure to fulfill Chapter 14 requirements, such as the winter moratorium and the protections for victims of domestic violence and medically vulnerable households? Absent a statutory scheme imposing clear legal responsibility on suppliers, and vesting the Commission with adequate enforcement authority, SCB creates a clear risk that consumers would suffer irreparable losses, without notice and opportunity to avoid the risks. Even if the consumer were properly referred to the public utility, their added time, energy, and potential expenditures to address their payment issue represent unavoidable harms resulting from SCB. Time away from work during business hours can be especially challenging for low wage and hourly employees, who are often prohibited or constrained from making calls during work hours. Low income consumers, who are far more

⁴¹ See id.

⁴² Cf. 52 Pa. Code §56.97(b)(1) (requiring notice of dispute rights and complaint procedures to be provided by public utilities).

likely to experience payment issues,⁴³ frequently lack access to stable telecommunications services, making multiple calls and potentially long wait times of particular concern. Indeed, under an SCB paradigm, by the time a consumer reaches the public utility to address their payment issue, the consumer's service may be subject to termination.

Policy considerations, such as the broader impact of SCB on low income and vulnerable Pennsylvanians, are discussed in greater detail in Section B. Suffice to say, the implementation of SCB in Pennsylvania would weaken the ability of public utilities to comply with Chapter 14 and would undermine the effectiveness of consumer protections contained therein, causing significant and substantial harm to consumers.

Chapter 14 – which governs the billing, collections, and termination standards, does not extend to suppliers. As such, absent clear legislative authorization and specific Commission enforcement authority, SCB must fail. As discussed in further detail in subsection iii, the Commission may not delegate the explicit duties of public utilities to a supplier. Doing so would contravene the Commission's express obligations to implement the requirements of Chapter 14.

iii. The Commission is obligated to ensure that the requirements contained in the Public Utility Code are fulfilled by public utilities, which it cannot do by delegating those requirements to suppliers.

As discussed at length above, Chapters 28 and 14 of the Public Utility Code impose unambiguous duties, obligations, and requirements directly on public utilities. Implementation of SCB would interrupt and/or usurp those obligations for reasons unsupported by sound utility

⁴³ **Approximately 57% of payment-troubled residential electric consumers and 75% of payment-troubled natural gas customers are classified as “confirmed low income” (verified income which does not exceed 150% of the Federal Poverty Level).** See Pa. PUC, BCS, 2016 Report on Universal Service Programs & Collections Performance, at 8-9 (Oct. 2017). These percentages are likely much higher, given the significant disparity between the estimated low income population and the confirmed low income population. *Id.* at 6-8. Utilities generally require a household to have recently submitted verified income documentation to be classified as “confirmed low income.”

policy. Indeed, the obligations imposed in Chapters 28 and 14 are not waivable – nor are they discretionary.

Proponents of SCB may nonetheless argue that the Commission may authorize a supplier to act in some expanded capacity as the party responsible for directly billing EDC service, so long as it ensures that **someone** satisfies the requirements imposed on EDCs through these enactments. The hypothetical argument that suppliers could be substituted for an EDC for purpose of meeting the statutory obligations imposed by the Public Utility Code is without merit and is inconsistent with closely analogous recent precedent from the Commonwealth Court.

In Section 4 of Act 201 of 2014 (the legislative Act which promulgated Chapter 14), the legislature explicitly declared that Chapter 14 supersedes inconsistent laws: “The addition of 66 Pa.C.S. Ch. 14 **supersedes any inconsistent requirements imposed by law** on public utilities.”⁴⁴ Section 6 then sets forth the parameters of Commission authority to implement the rigorous requirements of Chapter 14:

Section 6. The Pennsylvania Public Utility Commission shall amend the provisions of 52 Pa. Code Ch. 56 to comply with the provisions of 66 Pa. C.S. Ch. 14 and may promulgate other regulations to administer and enforce 66 Pa. C.S. Ch. 14, **but the promulgation of any such regulation shall not act to delay the implementation or effectiveness of this chapter.**⁴⁵

As established above, SCB is inconsistent with the requirements of Chapter 14 of the Public Utility Code and Chapter 56 of the Commission’s regulations, and would diminish the effectiveness of the provisions contained therein – in direct violation of the authorizing and implementation language in Sections 4 and 6 of Act 201 of 2004.

⁴⁴ Act 201 of 2004, PL 1578, Section 4(1), <http://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2004&sessInd=0&act=201>.

⁴⁵ Act 201 of 2004, PL 1578, Section 6, <http://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2004&sessInd=0&act=201>.

First, to the extent an EGS contract for SCB would require a customer to agree to allow a supplier to fulfill the requirements of Chapter 14, and effectively waive the imposition of those requirements on the public utility, such waiver would be void. It is well established that “a statutory right conferred on a private party, but affecting the public interest, may not be waived or released if such waiver or release contravenes the statutory policy.”⁴⁶ As discussed in greater detail throughout these Comments, waiver of a consumer’s statutory rights would directly contravene the express goals of Chapter 14 (i.e., to impose equitable rules for consumer billing, collection, and termination procedures) by allowing suppliers to impose inconsistent and/or impermissible rules and standards without any accountability.⁴⁷ Without continued and full effectiveness of the consumer protections contained in Chapter 14, individual consumers, their families, and the surrounding community would experience substantial harm. Such a result would contradict the Commission’s regulatory authority set forth in Chapter 14, which constrains the Commission to implement and effectuate the requirements of Chapter 14.⁴⁸

Similarly, there is no authority on which the Commission could rely to permit the delegation of the requirements of Chapter 14 from public utilities (here, EDCs) to suppliers. The Commonwealth Court recently examined an analogous proposal, which proposed to delegate the statutory obligation of a public utility to offer Time of Use rates, pursuant to the Choice Act, to a supplier.⁴⁹ Weighing this proposal against the clear statutory language of the Choice Act, the Commonwealth Court struck down a proposal that would effectively substitute an EGS for an EDC for purposes of fulfilling the provisions Time of Use provisions of the Choice Act. In *Dauphin*

⁴⁶ See *Brooklyn Sav. Bank v. O’Neil*, 324 U.S. 697, 704 (1945).

⁴⁷ 66 Pa. C.S. § 1402 (Declaration of Policy.)

⁴⁸ *Id.*

⁴⁹ *Dauphin County Indust. Dev. Auth. v. Pa. PUC*, 123 A.3d 1124, 1134-35 (Pa. Commw. Ct. 2015), *appeal denied* 140 A.3d 13 (Pa. 2016).

County Industrial Development Authority v. Pa. PUC, the Commonwealth Court held that the Commission is not entitled to “substitute” an unregulated entity for a regulated entity. The statutory requirement imposed on the regulated entity is non-transferrable:

The Commission’s interpretation of Section 2807(f) is not entitled to deference. Unlike the statute at issue in *Popowsky*, there is no ambiguity in the Competition Act’s mandate. ... Our rules of statutory construction require that words and phrases be read according to their common and approved usages. 1 Pa. C.S. §1903(a). The legislature’s unqualified use of the words “shall offer” in Section 2807(f)(5) places the burden on the default service provider, in this case PPL, to offer Time-of-Use rates to customer-generators. **The legislature knows the difference between a default service provider and an Electric Generation Supplier. Its decision to place the onus on default service providers was neither accidental nor arbitrary.**⁵⁰

Here, there is likewise no ambiguity with regard to which entity bears the responsibilities of compliance with Chapter 14: Each provision explicitly and unambiguously applies to “public utilities,” not suppliers. The same is true for Chapter 28, which imposes on EDCs the duty to “provide customer service functions consistent with the regulations of the commission.”⁵¹ As in *Dauphin County Industrial Development Authority*, the legislature’s “decision to place the onus” on public utilities “was neither accidental nor arbitrary,”⁵² and any action by the Commission to delegate those duties to suppliers – voluntarily or otherwise – is not entitled to deference.

It would also be unworkable to approve SCB based on a suppliers’ assertion of voluntary compliance with the requirements of Chapters 14. While certain suppliers may willingly offer to voluntarily comply with these rules in exchange for the Commission’s blessing to implement SCB, voluntary compliance would present a thorny issue if a supplier’s compliance was called into question in a complaint by a consumer or the Commission’s Bureau of Investigation and Enforcement. It is a dubious conclusion that the Commission would have authority to fully enforce

⁵⁰ Id.

⁵¹ 66 Pa. C.S. § 2807(d).

⁵² Id.

these provisions against a group of suppliers who volunteer to follow the rules, but are not governed by the applicable statute.

Chapter 14 was most recently updated, amended, and reauthorized less than four years ago, in December 2014. If the legislature had intended to allow suppliers to conduct billing, collections, and/or termination functions, it certainly could have amended Chapter 14 to do so. It did not. The Commission may not now – just over three years after the legislature reauthorized Chapter 14 – implement regulatory approval measures which would substitute suppliers for public utilities where such substitution is without any legal basis under Chapters 14 and 28. Under the current legislative paradigm contained in Chapters 14 and 28 of the Public Utility Code, SCB simply does not conform. The Commission may not use its power to otherwise delegate the responsibilities of EDCs to unregulated suppliers, nor may it in any way authorize the substitution of an unregulated party for a regulated party for purposes of satisfying statutory mandates. As such, the Commission must reject SCB.

B. Supplier Consolidated Billing is not in the public interest.

As argued above, SCB is not permissible under Pennsylvania law. That said, even if it were permissible, SCB is not in the public interest because it would be harmful to low and moderate income families in Pennsylvania who already struggle to keep service connected under the current paradigm of public utility billing, collection, and termination standards, and would further impede efforts to implement effective universal service programming capable of ensuring energy affordability. Moreover, if authorized, SCB would blur the demarcation of responsibility between public utilities and suppliers, leading to significant confusion and potentially wide-spread

abuses. Ultimately, SCB would harm the competitive market and consumers alike – at a great cost to all ratepayers⁵³ – and should not be authorized in Pennsylvania.

i. Supplier Consolidated Billing harms competition.

As the Commission noted in its End State Final Order, “[i]t is unclear how many suppliers would be willing to forgo the ease and convenience of utility consolidated billing under POR, where they have no bad debt risk, to opt to an SCB model where they assume the full burden of billing, collections and bad debt.”⁵⁴ Indeed, smaller suppliers likely do not have the internal capacity to offer SCB, and have raised concerns that SCB would harm competition.⁵⁵

Proponents of SCB may seek to fundamentally change how charges to customers are presented in bills and other notices, obscuring important information about the price of service customers are charged. For example, NRG made this concern clear in its 2016 Petition, seeking permission for a number of anti-competitive conventions.⁵⁶ In its Petition, NRG requested to consolidate EDC charges in its bill presentment, thereby obscuring the price to compare by charging a single, undesignated cost for distribution and generation costs.⁵⁷ This would complicate the ability for a consumer to freely choose a new supplier, and obfuscates the ability of the consumer to compare supplier’s terms against the price to compare or other offers in the competitive market. Similarly, in an attempt to ease specific concerns about the continued ability for consumers to access reasonable payment arrangements, as required by Chapter 14, NRG proposed that suppliers offering SCB be allowed to implement a blocking mechanism, which

⁵³ The many and varied costs associated with SCB is discussed in Section C.

⁵⁴ Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service, Final Order, Docket No. I-2011-2237952, at 67-68 (Feb. 14, 2013) (hereinafter End State Final Order).

⁵⁵ See Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Answer and Comments of Calpine Energy Solutions, LLC, Docket No. P-2016-2579249 (filed Jan. 23, 2017).

⁵⁶ See Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, at paras. 31, 37, 48-50, Docket No. P-2016-2579249 (filed Dec. 8, 2016).

⁵⁷ See id. at para. 48

would prevent those with a supplier-provided payment arrangement from switching to a new supplier until the terms of the payment arrangement are fulfilled.⁵⁸ Such a move would hold the consumer captive at a potentially unaffordable rate. Calpine Energy Solutions, LLC – a prominent Pennsylvania supplier – noted in response to NRG’s proposal to implement a blocking mechanism that “[h]olding a retail customer hostage until the customer has paid his or her past due bill in full circumvents and ignores existing market structures, shifts the risk to Pennsylvania consumers, and is the antithesis of competition.”⁵⁹

The Commission is currently engaged in a rulemaking to tighten supplier marketing regulations, and allow consumers to conduct a true rate comparison – including all applicable fees and service costs.⁶⁰ These efforts have become increasingly necessary to allow consumers to reasonably assess competitive offers in light of widespread and well-documented pricing abuses, which have led to undeniable confusion and dissatisfaction with the marketplace.⁶¹ Authorizing SCB would enlarge those abusive practices, allowing suppliers to obfuscate their prices, hide the price-to-compare, and otherwise make it difficult for consumers to assess offers.

⁵⁸ See *id.* at para. 37(e).

⁵⁹ Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Answer and Comments of Calpine Energy Solutions, LLC, Docket No. P-2016-2579249, at 7 (filed Jan. 23, 2017).

⁶⁰ See Rulemaking Regarding Electricity Generation Customer Choice, 52 Pa. Code Chapter 54, Notice of Proposed Rulemaking Order, Docket No. L-2017-2628991 (order entered Dec. 7, 2017).

⁶¹ A recent Public Input Hearing, held as part of the First Energy Companies’ current Default Service Proceeding, is instructive of the widespread negative shopping experiences. In that proceeding, about 350 consumers attended the hearing, 66 of whom testified under oath. All of the testifiers expressed outrage at a proposal to add a fee to default service to coerce customers to shop, and most shared personal stories about their negative experiences in the market. See Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of their Default Service Programs, Docket Nos. P-2017-2637855 *et al.*, Public Input Hearing Tr. pp. 63-306. Of course, several recent lawsuits against a number of competitive suppliers over marketing abuses are also instructive. See Alex Wolf, Law 360, Respond Power Pays \$5.2M to Settle Pa. Price Spike Suits (Aug. 11, 2016), <https://www.law360.com/articles/827574/respond-power-pays-5-2m-to-settle-pa-price-spike-suits>; Emily Field, Law 360, HIKO Energy Paying \$1.6M to End Pa. Price Spike Suit (May 4, 2015), <https://www.law360.com/articles/651172/hiko-energy-paying-1-6m-to-end-pa-price-spike-suit>; Emily Field, Law 360, Pa. Utility to Pay \$2.3M to End Price Spike Suit (March 25, 2015), <https://www.law360.com/articles/635486/pa-utility-to-pay-2-3m-to-end-price-spike-suit>.

In the past, suppliers have argued that they would like SCB in order to bill and market so called “value added” services to the bills of utility customers. While there may be a segment of the population who wish to be billed for unrelated products on their utility bill,⁶² this in and of itself is **not** a reason for the Commission to authorize SCB.

The stated purpose of the Choice Act is “to create direct access by retail customers to the competitive market for the *generation of electricity*.”⁶³ Indeed, the primary legislative purpose was to permit competitive forces to effectively control “*the cost of generating electricity*,” for the benefit of all customer classes, while ensuring that such service (essential to the health and well-being of residents) remains available to all customers on reasonable terms and conditions.⁶⁴ On the other hand, there is no mention of “value added” services anywhere in the Choice Act.

The non-commodity products and services often referenced by those who support SCB are not related to the generation of electricity, and are therefore not a part of the competitive market for retail electric supply authorized by the Choice Act. These charges drive up the cost of utility service, and – as discussed in section B.ii – work to diminish the effectiveness of critical universal service programming. Any concern about the ability to bill for these services on a consumer’s consolidated bill is without legislative foundation in the Choice Act and has no bearing on electric generation choice and competition. The goal of the Choice Act is to drive financial savings for electric service – not to facilitate the sale of unrelated products and services, such as thermostats, security systems, and HVAC systems.

⁶² It should be noted that, prior to proceeding with consideration of SCB, the Commission should determine whether there is sufficient interest from consumers to justify the substantial costs. See below, section C, regarding the costs associated with SCB, and section D, which discusses the need to fully investigate and assess those costs.

⁶³ 66 Pa. C.S. § 2802(12).

⁶⁴ 66 Pa. C.S. § 2802(5), (9), (10), (12).

ii. Supplier Consolidated Billing is incompatible with critical utility assistance programming for low income households.

The structure of SCB is incompatible with critical universal service programming, and directly contradicts the obligations of public utilities and the Commission to ensure that such programming is cost-effective, available, and adequately funded to ensure that all Pennsylvanians can afford basic utility services. Adding yet another intermediary between the needy household and available assistance programs would delay or otherwise deter enrollment, leading to deeper affordability issues across the state. Importantly, it would be insufficient to merely carve out low income populations, using proxies such as confirmed low income status or existing enrollment in a utility assistance program. Indeed, SCB must be rejected to avoid significant and compounded harm to low income populations.

1) The Low Income Home Energy Assistance Program

SCB is incompatible with the federal Low Income Home Energy Assistance Program (LIHEAP), which provides millions of dollars each year in emergency grant assistance to help vulnerable low income households to afford heat in the winter. The Pennsylvania Department of Human Services (DHS), which administers LIHEAP, explicitly prohibits suppliers from receiving LIHEAP grants.⁶⁵ The decision of DHS to exclude suppliers from receiving a grant is not merely

⁶⁵ LIHEAP is a federally funded block grant program administered on the Federal level by the United States Department of Health and Human Services Administration for Children and Families. In Pennsylvania, the block grant allocation is administered by the Pennsylvania Department of Human Services (DHS) pursuant to a State Plan that is submitted each year to HHS. The 2017-2018 LIHEAP State Plan submitted by DHS provides that LIHEAP grants will be paid directly to either the LIHEAP recipient's primary or secondary heating provider, so long as the provider is a licensed LIHEAP vendor. See Commonwealth of Pennsylvania, Low-Income Home Energy Assistance Program, Fiscal Year 2018 Final State Plan, (hereinafter 2018 LIHEAP State Plan), *available at* http://www.dhs.pa.gov/cs/groups/webcontent/documents/document/c_266106.pdf.

The 2018 LIHEAP State Plan defines "vendor" as:

An agent or company that directly distributes home-heating energy or service in exchange for payment. **The term does not include landlords, housing authorities, hotel managers or proprietors, rental agents, energy suppliers or generators,** or other parties who are not direct distributors of home-heating energy or service.

an oversight – it is an explicit expression of policy, which recognizes that *in light of restructuring*, and because EDCs “remain regulated” and subject to the winter moratorium, “[t]he interests of the Commonwealth’s low-income customers are best served and protected by sending the LIHEAP payment to the distribution companies.”⁶⁶ Given that suppliers are not regulated, and are not subject to the requirements of Chapter 14, it is not in the interest of the Commonwealth’s low income consumers to change these LIHEAP rules. As such, the implementation of SCB would complicate the ability of vulnerable low income households to receive assistance from LIHEAP to help afford essential utility service.

2) Customer Assistance Programs

SCB would diminish the cost-effectiveness, accessibility, and affordability of Customer Assistance Programs (CAPs). CAPs provide vulnerable low income consumers with a bill discount or credit and arrearage forgiveness, are paid for by residential consumers through a non-bypassable rate, and are structured and administered by EDCs subject to Commission oversight.⁶⁷ Each CAP is unique, with different calculations of benefits and different terms and conditions for enrollment. However, the same general statutory and regulatory mandates apply across the board. In short, Chapter 28 requires the Commission to ensure that universal services are accessible, cost-effective, and adequately funded to deliver affordable utility services to all

Under the restructuring statutes (66 Pa. C.S. § 2807, 66 Pa. C.S. § 2207), the distribution companies are the suppliers of last resort; they remain regulated, and must comply with the state’s winter termination rules in accordance with 66 Pa. C.S. § 1406(e). **The interests of the Commonwealth’s low-income customers are best served and protected by sending the LIHEAP payment to the distribution companies.**

Id. at Attachment B-3, § 601.3 (Definitions).

⁶⁶ Id.

⁶⁷ 66 Pa. C.S. §§ 2802(17), 2804(9); see also Retail Energy Supply Ass’n v. Pa. PUC, No. 230 C.D. 2017, at 24-25 (Pa. Commw. Ct. May 2, 2018).

those in need of assistance.⁶⁸ The Commission has an affirmative, statutory obligation to ensure that the level of assistance available to those in need is not diminished from levels available at the time of restructuring.⁶⁹

SCB would undermine the level of affordability produced by CAP because CAP calculations tend to use the Price to Compare to calculate CAP discounts or credits in an attempt to achieve an appropriate energy burden for the program participant, consistent with the Commission's CAP Policy Statement. This is logical as, unlike unregulated EGS-supply, default service is statutorily mandated to be provided at the least cost over time.⁷⁰ Substantial, long-term data in recent proceedings,⁷¹ as well recent research by the University of Pennsylvania,⁷² has shown that charges for competitive residential electric service most often exceed the Price to Compare – especially for low income consumers.⁷³ Those most in need of CAP to receive affordable bills are the same customers most likely to be harmed by higher prices for electricity in the competitive market. As the data bears out over a 52-month period, confirmed low income Pennsylvanians in the First Energy service territory alone were charged tens of millions of

⁶⁸ See *id.*

⁶⁹ 66 Pa. C.S. § 2802(10).

⁷⁰ 66 Pa. C.S. § 2807(e).

⁷¹ Retail Energy Supply Ass'n v. Pa. PUC, No. 230 C.D. 2017, at 36 (Pa. Commw. Ct. May 2, 2018) (“On the issue of harm, the evidence presented showed that between January 2012 and October 31, 2015, on average, nearly 10,000 CAP customers each month were paying above the PTC. These customers, together, were paying each month, on average, \$298,406 more than had they simply paid the PTC. Even when these overpaying CAP customers were considered together with those CAP customers who were paying below the PTC, the CAP was still more costly than the PUT, in an amount of \$228,656 each month, or more than \$2.7 million a year. This evidence was ‘unrefuted’. This data did not focus ‘on a simple point in time’[;] rather this data spanned 46 months. There is substantial evidence to support PUC’s finding this data demonstrated a pattern of a significant number of CAP customers overpaying for electricity.” (internal citations omitted)).

⁷² Christine Simeone & John Hanger, Kleinman Ctr. for Energy Policy, U. Penn, A Case Study of Electricity Competition Results in Pennsylvania (Oct. 28, 2016) (“During full implementation of restructuring (from 2011 to 2014), statewide average annual retail electricity rates to residential shopping customers were higher than utility default service rates.”).

⁷³ In the four First Energy service territories, over the course of 58 months, the net cost of CAP shopping was \$18,336,440 – paid by PCAP customers and other residential ratepayers who pay for the program. See Joint Petition of Metropolitan Edison Co., Pennsylvania Electric Co., Pennsylvania Power Co., and West Penn Power Co. for Approval of their Default Service Programs, Main Brief of CAUSE-PA, Docket Nos. P-2017-2637855, P-201702637857, P-2017-2637858, P-2017-2637866, at 29 (filed May 1, 2018).

dollars more than the price to compare.⁷⁴ SCB creates a pathway to enlarge this problem, not rectify it. As discussed above, SCB proponents may seek to mask the higher charges from EGSs by failing to provide contemporaneous and clear disclosure of the price-to-compare, and may attempt to re-bundle charges – making it difficult for consumers to compare. This essentially undermines the core universal service requirements of Chapter 28: That universal service programs, including CAP, be appropriately funded, cost-effective, and available in each electric distribution service territory.⁷⁵

Moreover, SCB would frustrate access to CAP because it would add yet another intermediary who is: unfamiliar with CAP; not required to make referrals to CAP; and not knowledgeable about the nuances of CAP programs. Adding an intermediary would also interfere with the core universal service requirements of Chapter 28, which demand that universal service programming not be diminished. As noted above, in section A.i, Chapter 14 contains explicit obligations on public utilities to refer payment troubled consumers to available universal service programs. Even if suppliers were to voluntarily agree to provide appropriate referrals, the Commission lacks the enforcement/oversight authority to ensure that supplier

⁷⁴ In First Energy’s service territory, shopping data showed that over a 52-month period, confirmed low income customers paid \$35.8 million more than they would have paid if they remained on default service. See Joint Petition of Metropolitan Edison Co., Pennsylvania Electric Co., Pennsylvania Power Co., and West Penn Power Co. for Approval of their Default Service Programs, CAUSE-PA St. 1, Docket Nos. P-2017-2637855, P-201702637857, P-2017-2637858, P-2017-2637866, at 26 n.41 (filed Feb. 22, 2018).

It bears noting that these confirmed low income customers are, themselves, not making out much better in the competitive market than the Companies’ PCAP customers. In response to discovery requests, the Companies provided a chart showing the net impact of shopping for all confirmed low income customers for the same period In sum, the information shows that over a substantially similar period of time (52 months from August 2013 through December 2017 as compared to the 55 months from June 2013 through December 2014 information for PCAP customers), **the Companies’ confirmed low income customers who shopped – on net – paid \$35,824,007 more than they would have paid had they remained on default service.** This amounts to \$8.2 million annually. While this also accounts for PCAP shopping over this period, it nonetheless shows the stark reality that the Companies’ low income customers are not making out very well in the competitive electric market.

Id. (emphasis in original).

⁷⁵ 66 Pa. C.S. § 2804(9) (Standards for restructuring of electric industry).

screening and referrals meet the needs of this vulnerable population. There are ten separate CAP structures run by the EDCs and NGDCs in Pennsylvania, each with vastly different rules for eligibility, enrollment, and benefit structures. An untold number of suppliers would have to learn the nuances of each program, and make appropriate referrals. Indeed, SCB would undoubtedly erode the effectiveness of the referral requirements in Chapter 14 that connect eligible consumers with available assistance. Such a result is contrary to the requirements in Chapter 28, which mandates that universal service programs remain accessible, cost-effective, and adequately funded to serve all those in need.

Proponents of SCB often argue that SCB is necessary to allow suppliers to offer non-energy products and services. As discussed above in section B.i, the ability to bill for non-energy products is not a goal or requirement of the Choice Act, and is in fact contrary to the purpose of the Choice Act to reduce the cost of electric generation services in Pennsylvania. But in addition to this concern, the costs associated with non-energy services are particularly harmful to low income households, and should not be allowed to appear on a consolidated bill from either a supplier or the utility. Indeed, this “value added” argument is inconsistent with the Commission’s universal service requirements, particularly the Commission’s stated policy regarding Customer Assistance Programs. Allowing suppliers to offer other products and services, for which they directly bill customers through SCB, would harm vulnerable low income consumers, and may disrupt their eligibility for CAP. CAP bills are paid, in part, by other ratepayers and Commission policy prohibits those ratepayers who pay for CAP to subsidize nonessential products and services which have been shown to increase the commodity price for basic service. The Commission’s CAP Policy Statement explicitly prohibits CAP participants from subscribing to “nonbasic services that would cause an increase in monthly billing and

would not contribute to bill reduction.”⁷⁶ While the policy statement provides that nonbasic services may be allowed if the service *reduces* the customer’s bills, the statement unequivocally concludes by explaining that, even still, “CAP credits should not be used to pay for nonbasic services.”⁷⁷

In addition to contradicting codified Commission policy, the “value added” argument also runs afoul of the universal service provisions of the Choice Act, which require the Commission to administer universal service programs like CAP in a manner that is “cost-effective for CAP participants and non-CAP participants who share the financial consequences of the CAP participants’ EGS choice.”⁷⁸ In fact, in a decision issued just this week, on May 2, 2018, the Commonwealth Court explained that charging CAP customers for value added services “appear[s] to be inconsistent with the Choice Act.”⁷⁹

In short, the structure and implications of SCB are wholly incompatible with the statutory and regulatory requirements of CAP, and – thus – SCB should be rejected.

3) Hardship Fund Programs

In addition to undermining the effectiveness and availability of LIHEAP and CAP, SCB would also erode the Hardship Fund program, which provides emergency grant assistance to those

⁷⁶ 52 Pa. Code § 69.265(3)(ii).

⁷⁷ Id.

⁷⁸ Coalition for Affordable Util. Servs. & Energy Efficiency in Pa, et al. v. Pa. Pub. Util. Comm’n, 120 A.3d 1087, 1103 (Pa. Commw. Ct. 2015), appeal denied, 2016 WL 1383864 (Pa. Apr. 5, 2016) (hereinafter CAUSE-PA et al.).

⁷⁹ Retail Energy Supply Ass’n v. Pa. PUC, No. 230 C.D. 2017, at 26 fn. 29 (Pa. Commw. Ct. May 2, 2018).

RESA’s advocacy in favor of unregulated competition so that CAP customers can choose an EGS for reasons “[b]eyond lower pricing” arguably undercuts the Choice Act’s concern for accessible, affordable, and cost-effective electrical service for all Pennsylvanians. RESA would have CAP customers “leverage the power of the competitive market” so that they might obtain “loyalty discounts, reward points and gift cards offered through some EGS programs.” However, that leverage of power comes at a cost to non-CAP customers who would be paying even more in subsidies, were there no shopping restrictions, so that CAP customers might earn more reward points to use at a retailer or restaurant. The use of the CAP in this manner would appear to be inconsistent with the Choice Act.

Id.

facing financial hardships, such as job loss, domestic violence, divorce, death or serious illness, and other acute personal hardships. Hardship Fund grants are generally available to households with income up to 200% of the Federal Poverty Level, which helps to fill the gaps for families who are just over the line for eligibility in LIHEAP and CAP. Hardship Fund programs are financed through voluntary donations on customer bills, which are generally matched by the public utility's shareholder dollars.⁸⁰ In the 2015-2016 program year, EDCs collected over \$1.1 million in voluntary contributions, which was matched by \$1.6 million in shareholder contributions. These donations are then administered and distributed to those in need. Under SCB, donations to the Hardship Fund programs would necessarily diminish because it would remove SCB customers from the pool of voluntary contributors and eliminate the possibility of public utility shareholder matching contributions with respect to such customers.

4) The Low Income Usage Reduction Program

Enrollment in the Low Income Usage Reduction Program (LIURP) is also likely to be constrained. The EDC's ability to track and determine high users across its service territory would be difficult under an SCB paradigm, thereby impeding the ability for utilities to target appropriate households for usage remediation. Moreover, participation in LIURP is frequently linked to CAP participation, which - as discussed above - is impeded by SCB. Additionally, low income consumers are often hesitant to participate in LIURP because they do not fully understand the programming. The EDCs serve a vital role in educating customers about the benefits of LIURP, which is essential to the ability to deliver the necessary service provided by these EDC-administered programs. If there is a disconnect between the billing entity and the administrator of

⁸⁰ See Pa. PUC, BCS, 2016 Customer Service Performance Report, at 63 (Aug. 2017), http://www.puc.state.pa.us/General/publications_reports/pdf/Customer_Service_Perform_Rpt2016.pdf.

LIURP, this information gap is likely to grow, deterring vulnerable, high-use and low income consumers from receiving the critical benefits provided through the program.

5) The Customer Assistance Referral and Evaluation Program (CARES)

The primary purpose of the Customer Assistance Referral and Evaluation Program (CARES) “is to provide a cost-effective service that helps payment troubled customers maximize their ability to pay utility bills and maintain safe and adequate utility service.”⁸¹ CARES is administered by staff within the public utility to connect consumers with resources within their community that can help address financial instability:

A utility CARES representative performs the task of strengthening and maintaining a network of community organizations and government agencies that can provide services to the program clients. CARES staff conduct outreach and make referrals to programs that provide energy assistance grants, such as LIHEAP, hardship finds, and to other agencies that provide cash assistance. LIHEAP outreach and networking are vital pieces of CARES, especially when addressing important health and safety concerns relating to utility service.⁸²

Unlike public utilities, which have longstanding relationships with the community built over decades of service, suppliers often operate from out of state, and do not have the knowledge or relationships with the community to perform this critical function, which matches vulnerable consumers with available assistance in their community. If SCB were allowed to be implemented in Pennsylvania, it would further impede the ability of consumers facing unique and difficult hardships to address financial instability.

⁸¹ Id. at 61.

⁸² Id.

- 6) An exemption for universal service participants would be insufficient to ameliorate the potential harm to low income households which will likely be caused by Supplier Consolidated Billing.

It would be insufficient to merely exempt universal service participants from participating in SCB. Households often move in and out of eligibility for universal service programming, based on any number of personal circumstances. Consumers may experience periods of unemployment, unexpected medical expenses, death or illness of a wage earner, domestic violence, and other hardships which can disrupt the household's financial stability. If a consumer faces such a hardship, it is critically important that they be promptly referred to available assistance programs to stabilize the household's finances and avoid further accrual of uncollectible expenses. But as discussed above, SCB would diminish the effectiveness of low-income assistance programs, jeopardize affordability, and undermine referral obligations. Under the current paradigm, subject to rigorous oversight, CAP and LIHEAP reach only a fraction of the eligible population.⁸³ SCB would further obscure access to these programs, further diminishing universal service program enrollment. Such a result is contrary to the explicit requirements of the Chapter 28 and the goals of universal service programming to provide affordable utility service to all Pennsylvanians.

iii. Supplier Consolidated Billing would harm vulnerable residential ratepayers.

In addition to lacking necessary legal authorization for implementation pursuant to Public Utility Code Chapters 14 and 28, discussed in Section A above, SCB is also incompatible with the intent and purpose of the consumer protection provisions contained therein. SCB would not only cause customer confusion, particularly for low income households who more likely to experience payment trouble and threatened loss of service, it would also create an enforcement nightmare.

⁸³ Id. at 50. In 2016, CAP participation rate for electric customers as a percentage of confirmed low income customers, was approximately 47%. That number is much lower when looking at the estimated eligible population, which is based on census data – rather than on whether a customer recently verified their income with the utility by submitting income information. See id. at 7.

Expansion of Commission oversight to include oversight of supplier billing functions would either significantly increase rates⁸⁴ or vastly undermine enforcement of consumer protections. These results are unacceptable, and contrary to the public interest.

In a recent review of SCB, the Connecticut Public Utilities Regulatory Authority (PURA) concluded that shifting the billing responsibilities from EDCs to suppliers would “very likely increase customer confusion and decrease customer satisfaction.”⁸⁵ That same concern applies here, and is an especially salient concern for low income consumers. As explained above, low income consumers are more likely to experience payment troubles, and are thus more likely to contact their utility for assistance. This is the same population that is less able to contact their utility during business hours to address issues as they arise, either because they lack flexibility to make personal calls during work or they lack access to stable telecommunications service.

As it stands, the Commission expends a significant amount of resources (financed by the Commonwealth’s ratepayers) to ensure that the regulated public utilities in Pennsylvania are fully compliant with the standards in Chapters 14 and 56.⁸⁶ But there are hundreds of suppliers operating in Pennsylvania. The resources necessary to effectively oversee each supplier’s separate billing operations would require significantly more resources with no material benefit. This means means that enforcement would either be inadequate or significant increased costs would be generated, which would inevitably increase customer rates. Neither result would be just or reasonable.

⁸⁴ The costs associated with SCB are discussed in further detail in Section C. A significant factor in assessing the total costs of SCB is the cost of expanded oversight of suppliers, including assessments for both the Commission and the statutory advocates.

⁸⁵ Decision in the Matter of PURA Review of Billing of All Components of Electric Service by Electric Suppliers, PURA Docket No. 13-08-15, at 6 (Aug. 6, 2014).

⁸⁶ In 2017, the Bureau of Consumer Services fielded 12,509 complaints, received 46,124 requests for payment arrangements, and 25,095 inquiries from residential consumers. Pa. PUC, BCS, Quarterly Update to UCARE Report, January – December 2017, at 4 (2018),

http://www.puc.state.pa.us/General/publications_reports/pdf/UCARE_2017-4Q.pdf.

Full and proper implementation and enforcement of the consumer protections contained in Chapters 14 and 56 is an ongoing and labor-intensive process, which requires training and retraining of utility staff, and constant course correction through the investigation of complaints fielded by the Commission's Bureau of Consumer Services and adjudication before the Commission's Administrative Law Judges.

In the Commission's End State of Default Service Investigation in 2012, and again in response to the NRG's Petition for Implementation of Electric Generation Supplier Consolidated Billing, the Pennsylvania Coalition Against Domestic Violence highlighted the severity of significant additional oversight obligations, and the likely impact on vulnerable populations and the service providers who assist those most in need:

As a practical matter, as noted in our prior comments, full implementation of the domestic violence protections in Chapter 14 and 56 has been difficult across the seven regulated electric utilities in Pennsylvania.

PCADV and its member programs have had difficulty in getting the incumbent EDCs to become familiar with the fact that Chapter 56 has a different set of rules for victims of domestic violence with a protection order. This educational gap has caused for many local domestic violence programs to expend a tremendous amount of staff time and resources to advocate on behalf of victims of domestic violence to obtain the protections to which they are statutorily entitled.

As we explained before: 'If it is hard to get seven EDCs who are closely regulated by the Commission to recognize these realities, getting the hundred plus licensed suppliers to comply with the provisions in Chapter 56, including those provisions that are applicable to survivors of domestic violence, will be nearly impossible.'⁸⁷

Impediments to enforcement of the critical consumer protections against the loss of utility services is not only harmful to the individuals, it is also harmful to the community as a whole. Households that cannot easily access assistance to pay their bill often suffer health consequences,

⁸⁷ Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Comments of the Pennsylvania Coalition Against Domestic Violence, Docket No. P-2016-2579249 (Jan. 23, 2017).

forgoing food, medicine, and other basic necessities to come up with the money to pay full tariff rates for service. This comes at great cost to the individual and their household, and can reverberate through the entire community – raising the cost of healthcare, draining scarce resources, and undermining the vibrancy and health of the local community.⁸⁸ Without utility services, households often turn to unsafe and/or costly alternatives for basic life essentials, including heating, cooking, refrigeration, and bathing. Extension cords are run from sympathetic neighbors, ovens or kerosene heaters are used to provide warmth, candles burn into the night, and gas-powered generators are fired up dangerously close to the home. Child development is often impacted, affecting a child's performance in school. Of course, evictions and eventual homelessness are also a direct result from the loss of service, which in turn creates strain on community safety net programs and emergency shelters. Indeed, eroding consumer service by involving suppliers in the core billing, dispute, and assistance functions performed by EDCs would exacerbate these social ills, impacting the community at large.

SCB is not in the public interest, as it would cause significant confusion for consumers, particularly those who are payment troubled or are facing the loss of critical utility services. At the same time, SCB undermines enforcement efforts to ensure that critical consumer protections are upheld. This is not only detrimental to individual households, but has a ripple effect through our surrounding communities. The Low Income Advocates submit that there is no policy justification for SCB, and urge the Commission to reject SCB.

⁸⁸ For a deeper look at the impact of the loss of utility services on low income Pennsylvanians, and the communities in which they live and work, see Review of Universal Service and Energy Conservation Programs, Joint Comments of CAUSE-PA and TURN et al., Docket No. M-2017-2596907, at 9-19 (filed Aug. 8, 2017).

C. Supplier Consolidated Billing is cost prohibitive.

As the Commission concluded just five years ago, “the extensive work and expense [to implement SCB] could result in a feature that will not be utilized sufficiently to justify the costs at this time.”⁸⁹ The Low Income Advocates agree: The costs associated with SCB are prohibitive, and substantially outweigh any potential benefit.

The likely costs associated with SCB include, but are not limited to:

- The sunk costs for each utility’s billing system, including those costs which have already been recovered and those costs which will still be recovered regardless of whether some consumers choose to be billed through their supplier;
- The cost to the EGS to develop a fully compliant billing system, including a full assessment of the likely impact to the cost for competitive service;
- The cost of Commission oversight, including increased work flow for the Bureau of Consumer Services, the Office of Administrative Law Judge, the Office of Special Assistants, the Law Bureau, the Bureau of Investigation and Enforcement, and the Bureau of Technical Utility Services;
- The increased cost for the statutory advocates, including the Office of Consumer Advocate and the Office of Small Business Advocate;
- The increased cost of staff training and systems development for EDCs to enable a transition of billing services for a segment of its customers;
- The increased cost of consumer education and outreach for the Commission, EDCs, EGSs, statutory advocates, and other consumer advocates;
- The cost to families who experience the loss or are threatened with the loss of critical electric service without access to critical consumer protections;
- The cost to social service providers that assist consumers facing the loss of electric service or who cannot afford to pay for service.

Unfortunately, any way you slice it, consumers are the ones who will pay for all of these costs – even if, on paper, the costs are allocated to the utility or the EGS. If passed on to an EGS, consumers pay through increased supplier pricing, which can be passed on to the consumer through fees or complicated pricing models designed to mask the higher costs. If passed on to the EDC, consumers will pay through increased base rates. But ratepayers have already paid and continue

⁸⁹ Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service, Final Order, Docket No. I-2011-2237952, at 67-68 (Feb. 14, 2013) (hereinafter End State Final Order).

to pay hundreds of millions of dollars through the base rate to develop sophisticated information technology infrastructure capable of producing bills which are fully compliant with the laws of the Commonwealth. Indeed, if the Commission allows SCB, consumers will pay a second time, with the inevitable result that customers will assume new risks associated with a billing structure that provides no discernible benefit in price or quality of service.

The claimed benefits of SCB do not outweigh these significant and substantial costs. Suppliers often argue that SCB is necessary to forge relationships with consumers, and reject alternatives as incomparable to the bond created through a direct and consolidated billing relationship. There are a plethora of other ways – apart from SCB – that companies can forge and nurture direct relationships with their customers: community events, giveaways, direct mailing, social media campaigns, team sponsorship, charitable donations, and most importantly by providing a reasonable rate for electric service. None of these common business strategies to forge long-term customer relationships would negatively impact the consumer rights and protections.

Connecticut's Public Utilities Regulatory Authority (PURA) recently reached the same conclusion. PURA explained:

The Authority disagrees with SCB supporters who imply that the only way to address Supplier concerns with UCB is by offering SCB for the following reasons.... Suppliers always have the opportunity to interface with their customers and market their products and services through numerous means. Suppliers could improve customer education and communication from the time the customer begins purchasing Service.⁹⁰

⁹⁰ Decision in the Matter of PURA of the Billing of All Components of Electric Service by Electric Suppliers, CT PURA Docket No. 13-08-15 (Aug. 6, 2014).

Arguments that SCB would allow suppliers to offer products and services not available in the market today fail to justify the risks of SCB. If suppliers wish to offer additional products and services, they may do so under the currently approved dual billing option. As PURA explained:

If the products, pricing and services are limited by the current UCB, the Supplier has the option to bill its customers directly under a dual billing option. This dual billing option is a tool for Suppliers to perform customized billing and rate structures. Potential customers could weigh the service under a single UCB bill versus those billed under the dual billing option.⁹¹

For those pricing structures which are not as conducive to dual billing, such time varying rates, additional changes to UCB are likely far less costly than a radical disruption of the current billing paradigm.

It is manifestly unjust and unreasonable to charge consumers duplicative costs for basic, necessary services, such as billing – especially where viable and less costly alternatives exist. Just five years ago, in February 2013, the Commission rejected SCB, and instead approved a number of changes to UCB.⁹² Those changes were enacted pursuant to the Commission’s May 23, 2015 Final Order (Joint Bill Order), and have not been afforded an opportunity to take shape or evolve, much less an opportunity to be evaluated for success.⁹³ However, the strength of the market today is a good indication that these changes were successful in driving market adoption rates. The shopping rates across the state continue to steadily grow, in spite of the fact that supplier rates are proving to impose significantly higher net costs than default service.⁹⁴

⁹¹ Id. at 6.

⁹² Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service, Final Order, Docket No. I-2011-2237952, at 67-68 (Feb. 14, 2013).

⁹³ Investigation of Pennsylvania’s Retail Electricity Market: Joint Electric Distribution Company – Electric Generation Supplier Bill, Final Order, Docket No. M-2014-2401345 (May 23, 2014) (Joint Bill Order).

⁹⁴ See Retail Energy Supply Ass’n v. Pa. PUC, No. 230 C.D. 2017, at 36 (Pa. Commw. Ct. May 2, 2018); See Joint Petition of Metropolitan Edison Co., Pennsylvania Electric Co., Pennsylvania Power Co., and West Penn Power Co. for Approval of their Default Service Programs, CAUSE-PA St. 1, Docket Nos. P-2017-2637855, P-201702637857, P-2017-2637858, P-2017-2637866, at 26 n.41 (filed Feb. 22, 2018).

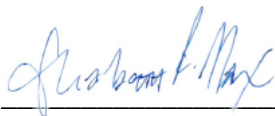
Rather than expend significant amounts of ratepayer dollars to implement SCB, the Commission should instead investigate the cost and effectiveness of the recent billing changes, and identify whether there are additional bill presentment changes to the UCB which could be reasonably made. Upending the current billing model to make sweeping and radical changes to implement SCB is not necessary, cost effective, or beneficial to consumers. Thus, SCB must fail.

IV. CONCLUSION

For all of the reasons stated above, the Low Income Advocates respectfully request that the Commission reject calls to implement SCB in Pennsylvania. We further request that the Commission grant our request to testify at the *En Banc* hearing on June 14, 2018, so that we may fully share with the Commission our substantial concerns about implementation of the billing convention in Pennsylvania, and answer any questions the Commission may have.

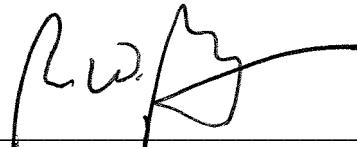
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CAUSE-PA Statement 1-R
APPENDIX B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

En Banc Hearing on Implementation of Supplier Consolidated Billing : Docket No. M-2018-2645254
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**JOINT REPLY COMMENTS OF
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)
AND
THE TENANT UNION REPRESENTATIVE NETWORK AND ACTION ALLIANCE OF
SENIOR CITIZENS OF GREATER PHILADELPHIA (TURN *ET AL.*)**

On March 27, 2018, the Pennsylvania Public Utility Commission (“Commission”) issued a Secretarial Letter listing a series of questions concerning Supplier Consolidated Billing (SCB), and invited interested parties to file comments by May 4, 2018, and set a June 14, 2018 *en banc* hearing. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), together with the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*) (collectively referred to herein as the Low Income Advocates) filed comprehensive comments detailing the full scope of our concerns regarding supplier consolidated billing.¹

On May 14, 2018, the Commission issued its second Secretarial Letter through which it established a second *en banc* hearing for July 12, 2018, and invited interested parties to file reply comments by August 24, 2018. By invitation from the Commission, the Low Income Advocates

¹ See Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, the Tenant Union Representative Network, and Action Alliance of Senior Citizens of Greater Philadelphia, Docket No. M-2018-2645254 (May 4, 2018) (hereinafter “Low Income Advocates’ Comments”).

testified at the first *en banc* hearing held on June 14, 2018. We now submit these brief reply comments for the Commission's consideration.

None of the parties supporting SCB has offered any arguments or evidence to rebut the positions advanced by the Low Income Advocates in our initial comments. We incorporate those comments by reference here, and summarize them below:

SCB is not permitted by the Public Utility Code

SCB is inconsistent with the Electric Generation Customer Choice and Competition Act.

- The Choice Act expressly delegates customer service functions to Electric Distribution Companies (EDCs). 66 Pa. C.S. § 2807(d). This necessarily includes the billing, collections, and termination standards contained in Chapter 14 of the Public Utility Code and Chapter 56 of the PUC's regulations.
- The Choice Act requires the PUC to ensure universal service programming is adequately funded, cost-effective, and available to those in need. 66 Pa. C.S. § 2802(9), (10), (17). If approved, SCB would create significant barriers to and curtail the effectiveness of universal service programming.
- The legislative history of the Choice Act evidences a clear intent for EDCs to continue to perform residential billing and customer service functions. Pa. House Journal at 2566 (Nov. 25, 1996) ("The consumer will be dealing directly with the transmission and distribution, and that stays the same, and that is also still regulated. And the duty to serve is still there.").

SCB is inconsistent with the Responsible Utility Customer Protection Act (Chapter 14) and the Standards and Billing Practices for Residential Utility Service (Chapter 56).

- Chapters 14 and 56 do not apply to suppliers. Absent clear statutory authority imposing legal responsibility on suppliers and enforcement authority on the PUC, consumers could be deprived of essential utility services without notice or an opportunity to prevent the termination. Supporters of SCB suggested at the *en banc* hearings that they could voluntarily take on the requirements of Chapter 14 and Chapter 56. However, voluntary adoption of responsibility does not and cannot offer the same level of protection to consumers, for the reasons explained more fully in our initial comments and in our oral testimony.
- Insufficient enforcement of Chapters 14 and 56 and the rights included therein would most severely impact low income families, who are disproportionately likely to need assistance, as well as medically vulnerable consumers and victims of domestic violence who are entitled to enhanced Chapter 14 and 56 protections.
 - Confirmed low income customers make up just 12.6% of the residential electric customer class, yet they account for 57.2% of payment troubled customers, 48.9% of payment arrangements, and 46.5% of involuntary terminations. (2016 Universal Service Report at 7-11).

- The PUC is not permitted to delegate the statutory duties of a public utility to a supplier. Dauphin County Industrial Authority v. Pa. PUC, 123 A.3d 1124, 1134-35 (Pa. Commw. Ct. 2015).

SCB is not in the Public Interest

SCB is Dangerous for Vulnerable Low Income Families

- SCB is incompatible with critical universal service programming, including Customer Assistance Programs (CAP), Hardship Funds, and the Low Income Usage Reduction Program (LIURP).
 - *SCB Undermines the Accessibility of Universal Service Programming*
Public utilities have an express duty under Chapter 14 to refer payment troubled customers to available universal service programming. 66 Pa. C.S. § 1410.1 (1)-(2). But even with this express obligation, and despite overwhelming demonstrated need for the program, CAP reaches less than half (47%) of *confirmed* low income customers – and just 22% of the *estimated* low income customers. (2016 Universal Service Report at 7, 50). Suppliers are under no such obligation and, thus, SCB would likely further erode already-insufficient CAP penetration rates.
 - *SCB Distorts CAP Program Costs and the Affordability Generated by the Program*
CAPs calculate discounts and/or credits based on the price of default service, and provide arrearage forgiveness on debts accrued prior to entry in the program. Supplier pricing is, on net, more expensive than default service. If SCB were to proceed as proposed, debts deferrable through CAP are likely to include higher costs for the same basic electric service, as well as potential products and services that may be lumped into the commodity cost for electricity under SCB. This would either (1) disqualify economically vulnerable customers from participating in CAP, or (2) create artificially higher programmatic costs. Both results are untenable and contrary to the requirements of the Choice Act that universal services must be adequately funded, cost effective, and available to those in need.
 - *SCB Diminishes the Availability of Hardship Fund Grants*
Hardship Fund programs are funded primarily through voluntary ratepayer donations and other independent fundraising efforts, which are matched by utility shareholder dollars. SCB would diminish the pool of ratepayer donors, which would in turn erode Hardship Fund donations.
 - *SCB Undermines the Effectiveness of LIURP*
SCB not only would interfere with LIURP referrals, as mentioned above, it would also impede the ability of EDCs to target high users and/or payment troubled consumers for usage reduction services.
- Supplier Consolidated Billing would undermine the ability of households to receive cash or crisis grant assistance through the Low Income Home Energy Assistance Program (LIHEAP), as the Pennsylvania Department of Human Services explicitly forbids suppliers from serving as a LIHEAP vendor. While this DHS policy could conceivably be revised in the future, the implementation issues created by such a broad expansion of LIHEAP vendors would cause

significant added administrative costs. This is just one of the many potential unintended costs associated with the implementation of SCB.

- Exclusion of universal service program participants from participating in SCB is insufficient to resolve these conflicts. As mentioned above, over half of *confirmed* low income customers are not currently enrolled in CAP, and the enrollment rate is even lower when you look at the *estimated* eligible population. Moreover, there are many consumers who experience an acute financial hardship, and find themselves newly eligible for assistance. Death of a primary wage earner, serious medical conditions, domestic violence, lay-offs or job losses can cause a household to face financial instability. Excluding only those who are currently participating in an assistance program would not address the thousands who may currently be eligible or who may be eligible for assistance in the future.

SCB is Unnecessarily Costly for Consumers

- Proponents of SCB have argued that any cost to the implementation of SCB would be minimal. But this is simply not true. Potential costs include, but are not limited to:
 - The sunk costs for each utility's billing system, including those costs which have already been recovered and those which will still be recovered regardless of whether some consumers choose to be billed through their supplier;
 - The cost to the supplier to create fully compliant billing systems, which will ultimately be passed to consumers;
 - The additional costs to the operational budgets of the Commission's various bureaus and offices associated with oversight of supplier billing practices, including training, case-handling, adjudication, and compliance reviews;
 - Additional costs for the Office of Attorney General that, under SCB, could experience an uptick in complaints related to supplier pricing, which would continue to fall outside of the Commission's jurisdiction;
 - Additional case-handling, training, and education costs for social and legal service agencies, which must learn the intricacies of a multitude of billing and complaint processes;
 - Additional costs to families who experience the loss or are threatened with the loss of critical electric service, without access to the same level of consumer protections available under the current billing paradigm.

It is instructive that many of the concerns noted above – and more fully explained in our initial comments – substantially mirror the concerns of each of the utilities who submitted comments at this docket,² as well as the Energy Association of Pennsylvania,³ and the Office of Consumer

² See Comments of PECO Energy Company at 2-5; PPL Electric Utilities, Inc. at 3-4; Duquesne Light Company at 4-12; Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company at 2-5; UGI Electric Division at 4.

³ See Comments of the Energy Association of Pennsylvania at 8-12.

Advocate.⁴ All of these parties have asserted that SCB is not permitted under the Public Utility Code, and further, it is both unnecessary and bad public policy.

Supporters of SCB have argued that SCB is necessary for suppliers to continue to compete in Pennsylvania. They argue that implementation of SCB would allow innovation of product offerings and services. However, when pressed at the *en banc* hearing, the EGSs were unable to come up with innovations or services specifically requiring a supplier consolidated bill, particularly given the potentials for harm. Instead, for the most part they cited goods and services that are already generally available, including:

- “frequent flyer miles”⁵
- “bundling electricity with cable and internet service”⁶
- “digital games and contests to encourage energy efficiency”⁷
- “smart thermostats”⁸
- “smart home automation”⁹
- “energy efficiency products”¹⁰
- “various applications to automate home energy and appliances.”¹¹
- “home security”¹²
- “HVAC Maintenance”¹³

⁴ See Comments of the Office of Consumer Advocate at 1-2.

⁵ Comments of the Retail Energy Supply Association at 12.

⁶ Id.

⁷ Id.

⁸ Id.

⁹ Id.

¹⁰ Id.

¹¹ Id.

¹² Comments of Drift Marketplace, Inc.

¹³ Id.

- “products from energy partners (e.g. NEST)”¹⁴
- “demand response products”¹⁵
- “time varying rates”¹⁶
- “prepaid energy plans”¹⁷
- “flat bill plans”¹⁸

In addition to many of these products already being available in the market place from non-utility providers and generation suppliers themselves, some are required to be provided by the EDCs themselves pursuant to the requirements of Act 129 of 2008.¹⁹ The EGS parties have provided no compelling arguments as to why these products should be provided by electricity suppliers, or are not already fully accessible to consumers on the marketplace. There has also been no showing by any of the parties supporting supplier consolidated billing that consumers are demanding these products be billed *by EGSs* on utility bills and, even if so, why dual billing is an insufficient solution. As pointed out by the Energy Association, “[t]here is nothing unduly or inherently prohibitive or complicated about dual billing that hinders EGSs’ ability to market and bill for other products services.”²⁰

As we emphasized in our initial comments, the purpose of the Choice Act is “to create direct access by retail customers to the competitive market for the *generation of electricity*.”²¹ Indeed, the primary legislative purpose was to permit competitive forces to effectively control “*the*

¹⁴ Id.

¹⁵ Comments of National Energy Marketers Association at 7.

¹⁶ Id.

¹⁷ Comments of EGS Coalition at 47.

¹⁸ Id.

¹⁹ See 66 Pa. C.S. § 2806.1(b), (d) (EDCs to offer energy conservation and energy efficiency plans and peak load reduction) and § 2807(f) (requiring EDCs as default service provider to provide time of use rates). The Low Income Advocates would also note that in the case of prepaid energy plans, the EGS parties have made no showing that such an offering would even be permissible under the Public Utility Code.

²⁰ EAP Comments at 7.

²¹ 66 Pa. C.S. § 2802(12).

cost of generating electricity,” for the benefit of all customer classes, while ensuring that such service (essential to the health and well-being of residents) remains available to all customers on reasonable terms and conditions.²² The Choice Act, and opening the electric market to competition generally, was never intended to be a vehicle to allow EGSs to peddle their non-commodity wares. In fact, there is no mention of “value added” services anywhere in the Choice Act. What the Choice Act did do – in addition to opening up wholesale and retail competition for electric commodity service – is enshrine into statute that “[e]lectric service is essential to the health and well-being of residents, to public safety and to orderly economic development,” and that “electric service should be available to all customers on reasonable terms and conditions.” 66 Pa. C.S. § 2802 (9).²³ The Choice Act further set out that “[r]eliable electric service is of the utmost importance to the health, safety and welfare of the citizens of the Commonwealth.” 66 Pa. C.S. § 2802 (12). Both EDCs and the PUC are responsible under the Public Utility Code for ensuring that these mandates are fulfilled. These obligations should not be lightly disregarded simply because EGSs desire to upend the billing paradigm. Supporters of SCB have made no showing of a nexus between the non-commodity products and services referenced by those who support SCB and the generation of electricity or the billing for electricity that would require SCB. As the Low Income Advocates noted in *en banc* testimony, SCB is inconsistent with the Public Utility Code, and no possible benefit of SCB outweighs the potentials for harm to consumers or the real danger SCB poses to keeping essential electric service available to all customers on reasonable terms and conditions.

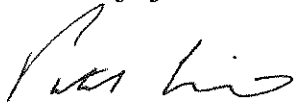
²² 66 Pa. C.S. § 2802(5), (9), (10), (12).

²³ See also Memphis Light, Gas & Water Division v. Craft, 436 U.S. 1, 18 (1978) (“Utility Service is a necessity of modern life; indeed, the discontinuance of water or heating for even short periods of time may threaten health and safety.”).

For all of the reasons outlined by the Low Income Advocates, the utilities, the Energy Association, and the Office of Consumer Advocate, the Commission should reject SCB as inconsistent with the Public Utility Code and the public interest.

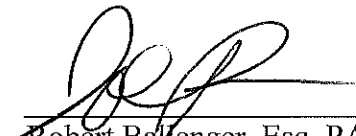
Respectfully Submitted,

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition of Metropolitan Edison Company, :
Pennsylvania Electric Company, Pennsylvania : Docket No. P-2021-3030012
Power Company, and West Penn Power Company : Docket No. P-2021-3030013
for Approval of their Default Service Programs for : Docket No. P-2021-3030014
the period commencing June 1, 2023, through May : Docket No. P-2021-3030021
31, 2027 :**

SURREBUTTAL TESTIMONY OF HARRY GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

April 7, 2022

1 **PREPARED SURREBUTTAL TESTIMONY OF HARRY GELLER**

2 **Q. Please state your name, occupation, and business address.**

3 A. Harry Geller. I am an attorney. I am currently retired from the Pennsylvania Utility Law
4 Project (PULP), though I have maintained an office at their location, 118 Locust St., Harrisburg,
5 PA 17101, and serve as a consultant to organizations representing the interests of low income
6 consumers. Since the Governor’s Emergency Order regarding the Covid-19 pandemic, I have been
7 working from 4213 Orchard Hill Rd, Harrisburg, PA, 17110.

8 **Q: Did you previously submit testimony in this proceeding?**

9 A: Yes, I submitted Direct and Rebuttal Testimony, which was premarked as CAUSE-PA
10 Statement 1 and CAUSE-PA Statement 1-R, respectively.

11 **Q. Please state the purpose of your rebuttal testimony.**

12 A: The purpose of my surrebuttal testimony is to respond to certain aspects of the Rebuttal
13 Testimony of Travis Kavulla on behalf of the Retail Energy Supply Association and NRG Energy,
14 Inc. (collectively, RESA/NRG) (RESA/NRG St. 1-R), as well as the Rebuttal Testimony of Joanne
15 M. Savage, Patricia M. Larkin, and Tiffanne L. Cowan on behalf of Metropolitan Edison Company
16 (MetEd), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power),
17 and West Penn Power (West Penn) (collectively, FirstEnergy) (FirstEnergy Statement 1-R, 5-R,
18 & 6-R).

19 My silence in response to any testimony served to date in this proceeding, including the
20 testimony discussed below, should not be construed as an agreement therewith. Unless required
21 for context or clarification in providing a further response to other parties’ testimony, I will not
22 reiterate the arguments, evidence, and recommendations that I provided in my direct and rebuttal
23 testimony. To the extent an argument raised by any party was already sufficiently addressed in

1 my direct or rebuttal testimony, I do not intend to respond, and stand firmly on the evaluation,
2 analysis, and recommendations contained in my direct and rebuttal testimony. Nothing proposed
3 by any other witness has changed my initial conclusions or recommendations.

4 **RESPONSE TO RESA/NRG WITNESS TRAVIS KAVULLA**

5 **Q: In your direct testimony, you provided a lengthy analysis of the prices residential, low**
6 **income, and CAP shopping customers paid, compared to what they would have paid if those**
7 **customers remained on default service. (CAUSE-PA St. 1 at 8-23 & Exhibits 1-7). How does**
8 **NRG/RESA witness Mr. Travis Kavulla respond?**

9 A: Mr. Kavulla argues that comparisons between default service rates and the price charged
10 in the competitive market “are misleading” because they fail to take into account certain “value-
11 added services” – including “donations to charitable organizations, free subscriptions to Amazon
12 Prime and rewards for energy conservation.” (RESA/NRG St. 1-R at 3). He argues that I should
13 have “imputed value” for these products and services, and that any rate comparison without such
14 imputed value “renders comparison meaningless.” (Id.) He also argues that “default service rates
15 do not account for all the costs incurred to provide default service” – suggesting that I am
16 “satisfied” to allow all customers to pay for those costs through distribution rates. (Id. at 4).

17 **Q: Did you consider the availability of so-called “value added” products and services in**
18 **your analysis?**

19 A: I recognize that suppliers sometimes have add-on offers and promotions, like a free
20 Amazon Prime membership. But I did not ascribe any dollar value to these uncertain and ancillary
21 products and services in my analysis of residential shopping rates or the impact of those rates on
22 FirstEnergy’s Customer Assistance Program (CAP). CAP is paid for by other residential
23 ratepayers, with the explicit purpose of ensuring that residential low income consumers can

1 reasonably afford to access and maintain basic electric service to their home – not to promote
2 ancillary products and services. (CAUSE-PA St. 1 at 26-29).¹ Thus, my analysis focused on
3 comparing the price CAP participants pay for *basic electric service* in the competitive market as
4 compared to the applicable default service rate – irrespective of any ancillary products and services
5 a supplier may have offered to justify higher rates.

6 Through this analysis, I found that in 2021 – two years after FirstEnergy implemented CAP
7 shopping restrictions intended to curtail excessive charges for basic service – CAP shopping
8 customers paid *on average* between \$248.52 and \$367.18 more than the default service price
9 across all four FirstEnergy Companies. (CAUSE-PA St. 1 at 16, T.6 & Exhibit 3). This is
10 substantially higher than the \$119 cost of an annual Amazon Prime membership fee in 2021.² But
11 even more to the point, the aggregate cost of CAP shopping equated to more than \$1.8 million in
12 2021 alone – all of which was shouldered unnecessarily by low income CAP consumers and the
13 residential ratepayers who support the program through rates. (CAUSE-PA St. 1 at Exhibit 3). The
14 purpose of CAP is to ensure low income consumers can reasonably afford to connect to and
15 maintain basic electric service – not to subsidize the promotion of one-day delivery of unrelated
16 items through Amazon Prime.

17 I also note that Mr. Kavulla’s assertion that such products and services are available in the
18 market is purely speculative. He criticizes the fact that I did not quantify potential “value added”
19 products and services, yet he provides no actual evidence of their “value” or even that low income
20 CAP customers in FirstEnergy’s service territory are offered such add-on products and services.
21 NRG Energy, Inc., a licensed Pennsylvania electric generation supplier (EGS) and parent company

¹ 66 Pa. C.S. § 2802(9), (10), 2803, 2804(9).

² See The annual fee was increased to \$139 in 2022. <https://www.amazon.com/amazonprime>.

1 of at least six competitive brands,³ controls the access to data and information that would be
2 essential to identify and/or quantify the value and benefit of current offers to CAP customers in
3 FirstEnergy’s service territory. But rather than provide any evidence of the products and services
4 currently offered to CAP customers in FirstEnergy’s service territory, or even a single citation to
5 where such offers are found, Mr. Kavulla, NRG’s Vice President of Regulatory Affairs, instead
6 proffers vague and unsupported marketing and promotional assertions that “valuable” products
7 and services are “widely available” in the competitive market and should be considered in
8 comparing relative costs of basic electric service against the applicable default service price.
9 (RESA/NRG St. 1-R at 3).

10 Even if it were reasonable to require residential consumers to subsidize CAP customers
11 who wish to elect “value added” products and services, I believe that any such products and
12 services which are not demonstrated to produce electric bill savings are of little to no value to a
13 low income CAP consumer if they are ultimately unable to maintain electricity to their home. As
14 I documented in my direct testimony, nearly 1 in 3 (29.45%) of CAP shopping customers in
15 FirstEnergy’s service territory had their electricity involuntarily terminated in 2021 because they
16 were unable to pay the price premium for service in the competitive market. (CAUSE-PA St. 1,
17 Exhibit 6(b)). I do not see, and Mr. Kavulla provided no evidence, of the “imputed value” of an
18 Amazon Prime membership for someone who cannot turn on their lights, run their heat, maintain
19 refrigeration, or even charge their phone because they paid a price premium in the competitive
20 market and now cannot afford to pay their electricity bill. I submit that for these 29.4% of CAP
21 shopping customers without basic service there was no “imputed value.”

³ Reuters, NRG Energy, Inc., <https://www.reuters.com/companies/NRG> (explaining that NRG Energy, Inc. includes at least the following brands: NRG, Reliant, Direct Energy, Green Mountain Energy, Stream, and XOOM Energy).

1 **Q: Mr. Kavulla opposes your recommendations to prohibit CAP shopping and to**
2 **prevent CAP customers from enrolling in the TOU and argues that you fail to account for**
3 **“what the customer wants” – and would “prefer that low income customers have no choices.”**
4 **(RESA/NRG St. 1-R at 4 (emphasis added)). How do you respond?**

5 A: After over 50 years working alongside low income consumers, I can say with confidence
6 that low income consumers want affordable bills. They want to have stable lights, heat, and
7 electricity to power their everyday lives. And they want to not lose sleep at night wondering
8 whether their service will be shut off because they had to pay for medical care with the money for
9 their light bill. The recommendations I made in my direct testimony will help alleviate unnecessary
10 expenses for CAP customers and will reduce expenses shouldered by other residential ratepayers,
11 enabling FirstEnergy to administer the program more efficiently – ultimately helping to achieve
12 the intent and purpose of the program.

13 Importantly, none of the recommendations set forth in my direct testimony would prohibit
14 low income consumers from choosing a competitive supplier or enrolling in a time varying rate.
15 If a low income customer chooses to shop or wishes to elect a time varying usage rate, they will
16 be able to do so under my recommendations. They just will not be able to do so while their rates
17 are subsidized by other residential ratepayers by virtue of their enrollment in CAP. In other words,
18 low income consumers will remain free to shop in the competitive market or enroll in FirstEnergy’s
19 TOU rates if they withdraw from CAP, which is itself a voluntary program.

20 **Q: In your direct testimony, you explained that time varying usage rates could be**
21 **harmful to low income consumers who cannot reasonably shift their usage to off-peak hours.**
22 **How did Mr. Kavulla respond?**

1 A: Mr. Kavulla suggests that I mischaracterized TOU research in my direct testimony. He
2 notes that one of the reports I cited in my testimony includes the following statement:

3 Research in most jurisdictions has shown that average lower income customers use less
4 electricity, and use proportionately less electricity during peak periods. Such lower usage
5 customers would thus benefit from a change in rate design from a flat rate to either an
6 inverted tier rate or a TOU rate. (RESA/NRG St. 1-R at 5).

7 **Q: How do you respond?**

8 A: Whether and to what extent a consumer benefits from a time-varying usage rate depends
9 on their ability to shift electricity usage to off-peak hours – not on their overall usage relative to
10 other households. As I explained in direct testimony, certain vulnerable consumer groups –
11 including households with medically vulnerable individuals, young children, Seniors, and
12 individuals with a disability, as well as those who live in energy inefficient homes – are uniquely
13 vulnerable to time-varying usage rates. (CAUSE-PA St. 1 at 41-43). This is especially true for
14 vulnerable consumer groups that also have low or fixed income and, thus, are unable to absorb the
15 price differential. This fact is explicitly recognized in the report Mr. Kavulla references, which
16 ultimately concludes: “It is important that deployment of TOU rates include programmatic
17 assistance to low- and moderate-income customers to adapt to the changes.”⁴

18 In total, the paragraph in question reads:

19 Research in most jurisdictions has shown that on average lower income customers
20 use less electricity, and use proportionately less electricity during peak periods.
21 Such lower usage customers would thus benefit from a change in rate design from
22 a flat rate to either an inverted tier rate or a TOU rate. *On the other hand, there is*
23 *evidence that lower-income customers have less discretionary load to shift than*
24 *higher-income customers (e.g., they have lower elasticities of demand), and lower-*
25 *income customers have less discretionary income to spend on automation and*
26 *enabling technologies, especially if those technologies (for example, smart*
27 *thermostats) are fixtures that would not be cost-effective for a renter with a short*

⁴ John T. Colgan et al., Guidance for Utilities Commissions on Time of Use Rates: A Shared Perspective from Consumer and Clean Energy Advocates, at 26-27, Equity and Distributional Bill Impacts (July 15, 2017), <https://usp.org/sites/pirg/files/reports/TOU-Paper-7.17.17.pdf>.

1 *time horizon*. It is important that deployment of TOU rates include programmatic
2 assistance to low- and moderate-income customers to adapt to the changes.⁵

3 Mr. Kavulla also ignores the remainder of the report, which discusses the potential for
4 substantial bill volatility of time varying usage rates, and the need for substantial consumer
5 protections when adopting time varying usage rates – particularly for low and moderate income
6 consumers.⁶ In contrast, Mr. Kavulla’s recommendation to make TOU rates mandatory for all
7 default service customers does not include any consumer protections. (CAUSE-PA St. 1-R at 14).

8 In attempting to closely parse the disputed report, Mr. Kavulla also ignores the other
9 substantial research cited in my direct testimony – including recent peer-reviewed research which
10 found that TOU rates “disproportionately increase bills for households with elderly and disabled
11 occupants, and predicts worse health outcomes for households with disabled or ethnic minority
12 occupants than those for non-vulnerable counterparts.”⁷

13 **RESPONSE TO FIRSTENERGY WITNESS JOANNE M. SAVAGE**

14 **Customer Referral Program**

15 **Q: In your direct testimony, you recommend that FirstEnergy discontinue its Customer**
16 **Referral Program (CRP) because there was no evidence that the program was beneficial to**
17 **consumers and, thus, there was insufficient evidence to conclude that the program is in the**

⁵ Id. (emphasis added).

⁶ Id.

⁷ Lee White & Nicole Sintov, Health and Financial Impacts of Demand-Side Response Measures Differ Across Sociodemographic Groups, Nature & Energy Vol. 5 (Jan. 2020).

1 **public interest. (CAUSE-PA St. 1 at 50-51). What was the response of FirstEnergy’s witness**
2 **Joanne M. Savage?**

3 A: Ms. Savage asserts that there is adequate support for FirstEnergy’s CRP, noting in short
4 that the CRP was initiated following the Commission’s Retail Market Investigation, and that the
5 program is consistent with the parameters approved by the Commission. (FirstEnergy St. 1-R at
6 4-5). She asserts that in FirstEnergy’s last Default Service Plan (DSP) proceeding in 2019, the
7 Commission approved the program notwithstanding the lack of evidence that CRP participants
8 were saving money on their bills. (Id.)

9 Ms. Savage in turn argues against any future evaluation of the CRP, noting that there has
10 only been one consumer complaint about the program since June 1, 2019. (Id. at 7). She asserts
11 that “the Companies do not believe that information that could be generated from customer
12 satisfaction surveys is relevant to continuation of the CRP in light of the Commission’s conclusion
13 in [its last DSP proceeding] that ‘the CRP is the easiest and safest way for a consumer to shop.’”
14 (Id.).

15 **Q: What is your response to Ms. Savage with regard to the CRP?**

16 A: First, to clarify, my recommendation that FirstEnergy discontinue its CRP (or, in the
17 alternative, require a third-party assessment of the program) was based on the lack of evidence *in*
18 *this proceeding* to support a conclusion that the CRP is in the public interest. (CAUSE-PA St. 1 at
19 47). Given the overwhelming evidence that residential shopping consumers are paying in the
20 aggregate tens of millions of dollars each year in excess of the default service price, I questioned
21 whether the CRP was achieving its overarching goal of educating consumers about participation
22 in the residential market. (Id. at 48-49). I explained that my review of all available evidence led
23 me to the conclusion that the CRP is not educating consumers, but instead functions “as a funnel

1 – sending residential consumers into the competitive market without providing proper supports for
2 the customer to learn about and engage in the market to determine whether shopping is right for
3 them.” (Id.) The data and testimony provided in this proceeding can no longer justify an earlier
4 conclusion that CRP is the easiest and safest way to shop.

5 The Commission’s conclusions regarding FirstEnergy’s CRP in 2019 – in the context of
6 its last DSP proceeding – are insufficient to justify continuation of that program now, in 2022.
7 While newly proposed utility-administered programs are often *initially* approved by the
8 Commission based on public policy alone, subsequent data is routinely evaluated - once available
9 - to appropriately assess performance and make any necessary adjustments before approving
10 continuation of a program. The CRP has been in operation for a decade – yet there has never been
11 any attempt at a qualitative or quantitative analysis of the program. Before approving the CRP to
12 continue, the Commission should require FirstEnergy to conduct such an analysis to ensure the
13 program is in the public interest.

14 I note that Ms. Savage also conflates the lack of informal consumer complaints regarding
15 the CRP with customer satisfaction. The relative lack of consumer complaints regarding
16 FirstEnergy’s CRP is not an indication that consumers are happy with the program, or that they
17 were effectively educated about how to engage in the competitive market consistent with the goals
18 of the program, or that they were able to shop “safely.”

19 Ultimately, I do not believe it is reasonable or just to approve the continuation of utility-
20 administered programming without any evaluation of available programmatic data to assess
21 program performance and determine whether the program is and continues to be in the public
22 interest. I stand by my initial recommendation that the Commission discontinue the CRP based
23 on the lack of evidence that continuation of the program is in the public interest or, in the

1 alternative, direct FirstEnergy to conduct a qualitative and quantitative third-party assessment of
2 the program to determine whether and to what extent the program is achieving its stated goals and,
3 in turn, whether and to what extent the program should continue. (CAUSE-PA St. 1 at 50-51).

4 **Q: Ms. Savage also disagreed that any changes to FirstEnergy’s CRP scripts were**
5 **warranted, arguing that FirstEnergy already made changes to its scripting in 2019.**
6 **(FirstEnergy St. 1-R at 7). How do you respond?**

7 A: FirstEnergy has not evaluated whether or to what extent the 2019 scripting changes
8 improved consumer understanding. Without any analysis or data, it is impossible to determine
9 with certainty whether the program is operating as intended.

10 **CAP Shopping**

11 **Q: In your direct testimony, you explained that CAP shopping customers have continued**
12 **to be charged millions of dollars more than the default service price since implementation of**
13 **FirstEnergy’s CAP shopping rules in 2019. How did Ms. Savage respond?**

14 A: Ms. Savage criticized my analysis, arguing that I only examined CAP shopping rates for a
15 “snap-shot” three-month period, January 2020 through March 2020. (FirstEnergy St. 1-R at 14).
16 She argues that this “snap-shot” of data does not “provide an accurate picture” of whether suppliers
17 are complying with FirstEnergy’s CAP shopping rules “because customers that enter CAP with
18 pre-existing, fixed duration EGS contracts at prices above the PTC are permitted to remain with
19 that supplier until the end of the contract term.” (Id.) She goes on to argue that FirstEnergy has no
20 “visibility” into EGS contracts and, thus, cannot enforce its existing CAP shopping rules. (Id. at
21 15). She asserts that, “even if they did” have visibility into EGS contracts, it would be too time
22 consuming to “monitor compliance” with CAP shopping rules.

1 Without further analysis, Ms. Savage concludes that continuation of FirstEnergy’s existing
2 CAP shopping rules “strikes a reasonable balance among the Companies policies of further
3 developing Pennsylvania’s competitive retail market, ensuring affordability of service for the
4 Companies’ low-income customers, and containing costs for all residential customers that pay for
5 CAP.” (Id.)

6 **Q: How do you respond?**

7 A: First, Ms. Savage mischaracterizes the data analyzed in this proceeding. She is correct that
8 my analysis included an in-depth look at *individual* CAP shopping charges for the three-month
9 period of January 2020 to March 2020, which found that between 68-99% of CAP shopping
10 customers across all four Companies were charged prices in excess of the default service price
11 during each of the evaluated months. (CAUSE-PA St. 1 at 35, T.15 & Exhibit 7). But my direct
12 testimony was by no means limited to this three month “snap-shot”. To the contrary, I examined
13 the average, aggregate shopping charges for CAP customers on a monthly basis from July 2017 to
14 December 2021. I also analyzed the relative CAP account write-offs for CAP shopping accounts
15 compared to CAP default service accounts, and the relative payment troubled and termination rates
16 for CAP shopping customers compared to CAP default service customers. All of this data pointed
17 to serious and substantial deficiencies with FirstEnergy’s current CAP shopping rules.

18 This extensive data analysis found that, since June 2019, when FirstEnergy implemented
19 CAP shopping protections, CAP customers have continued to pay substantially higher rates than
20 the applicable default service price – totaling over \$4 million. (CAUSE-PA St. 1 at Exhibit 3). All
21 of these costs fell on low income CAP customers and other residential ratepayers. (Id. at 29).

1 **TABLE 1: CAP Shopping Charges in Excess of Default Service Price Since June 2019**⁸

	Total CAP Shopping Charges in Excess of Default Service	Avg. Charges <u>Per CAP Customer</u> in Excess of Default
MetEd	\$1,107,860.30	\$651.38
Penelec	\$1,147,910.33	\$520.62
Penn Power	\$278,010.85	\$640.92
West Penn	\$1,488,526.93	\$761.39
TOTAL	\$4,022,308.41	

2

3 The data also showed substantial disparities in relative account write-offs. In fact, the
4 average account write-off for CAP shopping accounts has increased since CAP shopping rules
5 were implemented in 2019 – while the average account write-off for CAP default service accounts
6 has decreased.

7 **TABLE 2: CAP Account Write-Offs Since 2019, CAP Shopping v. CAP Default**⁹

	Avg. Write-Off, CAP Shopping	Avg. Write-Off, CAP Default
2019	\$1,561.04	\$1,108.01
2020	\$1,471.57	\$970.63
2021	\$1,876.11	\$1,038.69

8 Likewise, the data also revealed substantial disparities in relative payment trouble and
9 termination rates between CAP shopping customers and default service customers.

10 **TABLE 3: CAP Payment Troubled Rates Since 2019, CAP Shopping v. CAP Default**¹⁰

	Payment Troubled Rate, CAP Shopping	Payment Troubled Rate, CAP Default
2019	5.39%	2.24%
2020	5.31%	1.46%
2021	9.43%	1.8%

⁸ CAUSE-PA St. 1, Exhibit 3: CAP Shopping

⁹ CAUSE-PA St. 1, Exhibit 4: Write-Offs

¹⁰ CAUSE-PA St. 1, Exhibit 5

1 **TABLE 4: CAP Termination Rates Since 2019, CAP Shopping v. CAP Default¹¹**

	Payment Troubled Rate, CAP Shopping	Payment Troubled Rate, CAP Default
2019	21.31%	7.82%
2020	0.27%	0.07%
2021	29.45%	8.77%

2

3 In 2021, *two years after FirstEnergy implemented CAP shopping restrictions*, nearly 1 in
 4 3 CAP shopping customers were terminated for nonpayment, compared to less than 1 in 10 CAP
 5 default service customers. In turn, average account write-offs for CAP shopping customers
 6 reached \$1,876.11 in 2021, compared to \$1,038.69 for CAP default service customers - increasing
 7 costs borne by all residential ratepayers.

8 Ms. Savage makes no mention of this data – instead focusing singularly on my analysis of
 9 three months of data – January to March 2020 – which examined the percentage of CAP customers
 10 that paid a price higher than the default service price. This data is nevertheless compelling in and
 11 of itself – revealing that between 68-99% of CAP shopping customers in those months were paying
 12 rates greater than the default service price in violation of FirstEnergy’s CAP shopping rules.
 13 (CAUSE-PA St. 1 at 35 & Exhibit 7). While I agree that FirstEnergy’s transitional rules for new
 14 CAP enrollees exacerbates the problem and helps explain some level of ongoing CAP shopping in
 15 excess of the default service price beyond June 2019, it does not explain why as many as 99% of
 16 CAP shopping customers were still paying rates in excess of the default service price in January,
 17 February, and March 2020. (Id.)

¹¹ CAUSE-PA St. 1, Exhibit 6

1 Ultimately, I believe it is patently unreasonable to conclude – when faced with this
2 evidence – that FirstEnergy’s CAP shopping rules “strikes a reasonable balance” of the relative
3 interests. To the contrary, it appears to me that FirstEnergy’s insistence on the continuation of its
4 current CAP shopping rules without amendment presents no balance. The current rules further
5 development of Pennsylvania’s competitive retail market, in the short term, but they fail to ensure
6 affordability of service for the Companies’ low-income customers or to contain costs for all
7 residential customers that pay for CAP, or to account in any respect for the ability of low income
8 CAP customers to connect and maintain service to their home.” (Id.)

9 **Q: Ms. Savage also takes issue with your recommendation to allow low income**
10 **consumers to enroll in CAP without fees or penalties imposed by suppliers. (FirstEnergy St.**
11 **1-R at 16). She argues that FirstEnergy lacks authority to implement such restrictions, and**
12 **that it would be difficult for FirstEnergy’s CAP administrator, Dollar Energy Fund, to**
13 **implement. (Id. at 15). How do you respond?**

14 A: Whether the Commission has authority to impose restrictions on the imposition of fees or
15 penalties on low income consumers applying for CAP is a legal question that will be addressed by
16 counsel for CAUSE-PA through briefing.

17 Nevertheless, Ms. Savage’s argument that such rules would be difficult for Dollar Energy
18 Fund to administer should be given no credence. Her argument rests on the fact that Dollar Energy
19 Fund also administers CAPs for Peoples Gas and Columbia Gas. (Id. at 16). While it is true that
20 Dollar Energy Fund administers the CAPs for these two utilities, it is also true that Dollar Energy
21 administers a significant number of other electric, gas, and water CAPs and other types of utility
22 assistance programs. The eligibility, terms, and conditions for each CAP vary by utility – in
23 accordance with each utility’s Universal Service and Energy Conservation Plan. Some of these

1 utilities have not permitted CAP customer shopping for a number of years. Thus, if anything,
2 variation among CAP programs has not proven to be an administrative difficulty for Dollar Energy
3 but is an element right within its wheelhouse of expertise. Further, by eliminating shopping for its
4 CAP customers, First Energy would be bringing its CAP closer into alignment with each of the
5 other Electric Distribution Companies in Pennsylvania – making it easier, not harder, for Dollar
6 Energy Fund to administer in coordination with the other programs.

7 **RESPONSE TO FIRSTENERGY WITNESS PATRICIA M. LARKIN**

8 **Q: Please summarize your recommendations regarding FirstEnergy’s Time of Use**
9 **(TOU) rate proposal.**

10 A: Given the unique financial and health-related impacts of time varying usage rates on certain
11 vulnerable groups, I made several recommendations designed to appropriately educate these
12 customer groups if they seek to enroll in FirstEnergy’s TOU rates. First, I recommended that
13 FirstEnergy inquire whether a household has medical usage if they ask about TOU rates and, if so,
14 to provide medical usage customers with additional education and an individualized bill
15 assessment prior to enrolling that consumer into a TOU rate option. (CAUSE-PA St. 1 at 43).
16 Second, I recommended that all TOU informational and outreach materials include information
17 about the availability of universal service programs, and that FirstEnergy offer to screen consumers
18 for eligibility in universal service programs if the consumer asks about TOU rates. (Id.) Third, I
19 recommended that FirstEnergy develop a bill impact assessment tool that all consumers could use
20 to assess the impact of TOU rates on their bill based on historical usage patterns over the prior
21 year – and that FirstEnergy inform consumers of the tool when they inquire about the TOU rate.
22 (Id. at 44). Fourth, I recommended that FirstEnergy track certain characteristics of the TOU rate
23 participants – including income, age, race/ethnicity, and disability status – to allow for an analysis

1 of the impact of time-varying rates on consumers. Finally, I recommended that FirstEnergy
2 conduct a third-party analysis of TOU rates to be submitted in its next default service plan
3 proceeding.

4 **Q: How did Ms. Larkin respond to these recommendations?**

5 A: Ms. Larkin characterizes my first three recommendations as requiring “targeted and
6 personalized outreach to vulnerable households seeking to enroll in the Companies’ TOU Riders
7 about the available universal service programs prior to enrollment.” (FirstEnergy St. 5 at 14).
8 While she recognizes the potential harm of time varying usage rates on low income and medically
9 vulnerable consumers, she argues that my recommendations “would add administrative
10 complexity and cost” and would “require the Companies to screen and verify the household
11 income and medical usage of every customer interested in optional TOU riders.” (Id.)

12 She also summarily dismisses my recommendations to track and assess the impact of TOU
13 rates based on various demographic groups, noting simply that the Companies have considered
14 these recommendations but do not believe they are necessary at this time because TOU rates are
15 optional. (Id.)

16 **Q: How do you respond?**

17 A: I think Ms. Larkin may have misunderstood the nature of my first three recommendations,
18 none of which would require any “targeted and personalized outreach” to consumers about TOU
19 rates. To the contrary, each of my recommendations are centered on providing pertinent
20 information to consumers who contact FirstEnergy to inquire about the TOU rate – not that
21 FirstEnergy engage in affirmative outreach efforts to any specific groups. (CAUSE-PA St. 1 at
22 43-44). I also recommended that FirstEnergy include information about available universal service

1 programs in its TOU outreach and educational materials, but nowhere do I recommend “targeted
2 and personalized outreach” about TOU rates to any specific group.

3 I also disagree with Ms. Larkin that an assessment of FirstEnergy’s TOU rates is not
4 necessary because TOU rates are optional. My earlier testimony detailed the potential health and
5 economic consequences of TOU rates for certain individuals and or groups. The optional nature
6 of a utility offering to the consuming public does not transform that offering to a “buyer beware”
7 product or beyond prudent oversight by the utility or Commission. It is important to understand
8 how TOU rates impact various consumer groups. Indeed, just because a program or rate is optional
9 does not mean that we should forego assessment to understand how to improve that optional
10 offering to better serve the needs of consumers and prevent unintended harm.

11 **Q: Does this conclude your surrebuttal testimony?**

12 A: Yes.