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October 19, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: ***Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. P-2020-3018883***

Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. M-2017-2636969

Petition to Amend Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. P-2020-3018884

Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. M-2017-2636973

Petition to Amend Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. P-2020-3018873

Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. M-2017-2636976

Petition to Amend West Penn Power Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. P-2020-3018885

West Penn Power Company Universal Service and Energy Conservation Plan for 2019-2023; Docket No. M-2017-2636978

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order entered July 16, 2021, as modified by the Commission's Secretarial Letters issued on August 4 and August 17, 2021, respectively, all of which were entered in the above-captioned proceeding, enclosed herewith for filing are the *Reply Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company*.

Please contact me if you have any questions regarding this matter.

Very truly yours,

Tori L. Giesler

kbw
Enclosures

c: As Per Certificate of Service
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023	:	**Docket No. P-2020-3018883**
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REPLY COMMENTS OF METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY, AND WEST PENN POWER COMPANY

I. INTRODUCTION

On July 16, 2021, the Pennsylvania Public Utility Commission ("Commission" or "PUC") entered an Order[1] regarding the Joint Universal Service and Energy Conservation Plan ("USECP"

[1] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for*

or "Joint Plan") filed with the Commission by Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (individually referred to as "Company" and collectively as the "Companies") on February 21, 2020.[2] Therein, *inter alia*, the Commission directed the Companies to submit supplemental information related to their Joint Plan and established a comment period, which was subsequently twice modified by two separate Secretarial Letters,[3] for interested parties to respond thereto.

Pursuant to the final revised submission date provided in the PUC's August 17, 2021 Secretarial Letter, on August 25, 2021, the Companies filed their *Supplemental Information* with the Commission in this proceeding.[4] Therein, the Companies proffered data and information in response to the inquiries made by the PUC in their *July 16 Order* regarding the Companies' Joint Plan.

2019-2023, Docket No. M-2017-2636969; *Petition to Amend Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018884; *Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636973; *Petition to Amend Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018873; *Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636976; *Petition to Amend West Penn Power Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018885; *West Penn Power Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636978, *Order Directing Supplemental Information and Establishing Comment Period* (entered July 16, 2021) ("*July 16 Order*").

[2] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883, *et al.*; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636969, *et al.*; *Joint Universal Service and Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company* (filed February 21, 2020) ("Joint Plan").

[3] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883, *et al.*; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636969, *et al.*; *August 4, 2021 Secretarial Letter* (issued August 4, 2021) and *August 17, 2021 Secretarial Letter* (issued August 17, 2021).

[4] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883, *et al.*; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636969, *et al.*; *Supplemental Information of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company* (filed August 25, 2021) ("*Supplemental Information*").

On October 4, 2021, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA")[5] and the Office of Consumer Advocate ("OCA")[6] each submitted individual *Initial Comments* in this proceeding regarding the *Supplemental Information* submitted by the Companies. Through these *Reply Comments*, the Companies will now respond.

II. <u>REPLY COMMENTS</u>

OCA and CAUSE-PA are the only parties to have submitted initial comments in this proceeding pursuant to the PUC's *July 16 Order*. Notwithstanding a limited number of requests for the Companies to make discrete, minor changes to their proposed Joint Plan, CAUSE-PA, through their *Initial Comments*, endorses the Companies' proposed amendments and requests that the Commission approve it without further delay. OCA, on the other hand, does not.

A. Request for Expedited Review

The Commission, in their *Final Policy Statement and Order*, importuned electric distribution companies ("EDCs") and natural gas distribution companies ("NGDCs") to "incorporate the CAP policy amendments in their USECPs as *fully and quickly as possible* so that all stakeholders will have a basis for meaningful input in the Universal Service Rulemaking."[7] The Companies did just that, filing their Joint Plan within three months (i.e., on February 21, 2020) of the *Final Policy Statement and Order's* issuance. Unforeseeably, during the same time the Joint Petition was under consideration, the COVID-19 pandemic enveloped this country and the world.

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[5] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883, *et al.*; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636969, *et al.*; *Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania* (filed October 4, 2021) ("*Initial Comments*" or "*Comments*").

[6] *Petition to Amend Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. P-2020-3018883, *et al.*; *Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2019-2023*, Docket No. M-2017-2636969, *et al.*; *Comments of the Office of the Consumer Advocate* (filed October 4, 2021) ("*Initial Comments*" or "*Comments*").

[7] *2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order*, Docket No. M-2019-3012599, at 2 (entered November 5, 2019) (emphasis added) ("*Final Policy Statement and Order*").

The Companies fully understand and genuinely appreciate the Commission's statutory duty to carefully review any and all submissions brought before it for consideration. However, the Companies respectfully submit that the 18 months the PUC has had to review the Companies' Joint Plan, combined with the supporting data submitted therewith and through the Companies' *Supplemental Information*, have afforded the Commission the requisite time and information required for it to render an informed, duly considered decision regarding the Companies' Joint Plan. Accordingly, the Companies respectfully request that the PUC issue a final Order regarding their Joint Plan without further delay. In this way, the Companies can begin to quickly implement and roll out the enhanced bill-assistance programs/protections reflected therein and thereby provide the Companies' low-income customers the much-needed relief they require during these exceptionally challenging times.

B. OCA's Initial Comments

1. The Differences in the Companies' Proposed Program Costs Identified by OCA Are Readily Explainable.

In their *Initial Comments*, OCA avers "there are significant differences in the proposed costs of the program as identified in the Companies' Petition, the Supplemental Information, and the 2019 BCS Annual Report[]".[8] OCA attempts to highlight these cost differences in a table on page 6 of their *Comments* and asks the Companies to elucidate in their *Reply Comments*.

The Companies' Pennsylvania Customer Assistance Program ("PCAP") program costs enumerated in the table on page 6 of OCA's *Initial Comments* do not provide an apples-to-apples comparison. The time periods, program rules, current events, or a combination thereof were different for each report of data or projected data reflected in the Companies' Joint Plan and *Supplemental Information* and the 2019 Bureau of Consumer Services' ("BCS") Annual Report.

[8] OCA *Comments* 5.

For example, the 2019 BCS Annual Report was based on actual 2018 data for the Companies' fixed-credit PCAP plan.

Conversely, the Companies' Joint Plan, which was filed with the PUC in February 2020, includes participant projections—a factor in all cost estimations. Costs increase or decrease based on participant levels. Projections were based on known participation levels at the time they were prepared and the estimated impact from the proposed changes—such as, longer recertification periods and increased recertification outreach.

The Companies' *Supplemental Information* was filed in August 2021. The participant projections reflected therein were adjusted based on then-current data and the estimated impact based on the proposed changes.

In sum, the program costs reflected in the 2019 BCS Annual Report, the Companies' Joint Plan, and the Companies' *Supplemental Information* capture very distinct periods in time and therefore are the products of varying inputs necessitated by those differences for the reasons described above.

2. The Commission Should Approve the Companies' Proposed Energy-Burden Reductions Without Modification or Delay.

OCA objects to the energy-burden reductions proposed in the Companies' Joint Plan, its rationale being that the resulting cost increases are ill-timed in light of the financial impacts of COVID-19 on residential ratepayers. OCA opines that, "[a]sking residential customers to assume greater costs during this difficult economic time would further strain affordability for the many residential customers who do not qualify for CAP or who do not participate in CAP."[9] Accordingly, OCA asks the Commission to "postpone this change or mitigate the impact by

[9] *Id.* at *Comments* 8.

moderating the change in the energy burdens until such time as a full consideration of the necessary balance during this pandemic can be had."[10]

The Companies are very sensitive to the cost concerns expressed by OCA in this regard and have been quite forthcoming about the cost increases that customers with incomes between 51% and 150% of the federal poverty level ("FPL") will incur if their proposed reductions in energy burdens for PCAP customers at or below 50% FPL are approved/implemented. It is because of these concerns that the Companies worked painstakingly to develop proposed amendments to their PCAP that fulfill the dual purposes of conforming it to the *Final Policy Statement and Order* and imposing minimal costs on the Companies' residential customers.[11] That said, OCA's criticism of this aspect of the Companies' Joint Plan tell only one part of the story.

For example, it cannot be overstated that the proposed energy burden reductions, as well as every other proposal in the Companies' Joint Plan, have been put forth by the Companies in response to the policy guidance the Commission provided in its *Final Policy Statement and Order*. Therein, the PUC strongly encouraged EDCs to "incorporate the CAP policy amendments in their USECPs as *fully and quickly as possible*".[12] That is precisely what the Companies have done. None of the Companies' proposed amendments to their PCAP are the result of the Companies' unilateral actions; rather, each is in direct response to the Commission's updated policy guidance in this space, as set forth in the PUC's *Final Policy Statement and Order*.

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[10] *Id.* at 10.

[11] *See Final Policy Statement and Order* 8 ("The Commission balances the interests of customers who benefit from CAPs with the interests of the other residential customers who pay for such programs.").

[12] *Id.* at 2.

Moreover, the Companies' proposed energy burden reductions, which would reduce the energy burdens for energy non-heating and energy heating customers at or below 50% FPL from 3% to 2% and 9% to 6%, respectively, fall squarely within those recommended in the PUC's *Final Policy Statement and Order*. OCA does not (and cannot) dispute this critical fact. Furthermore, OCA does not contend that the Companies' proposed energy burden reductions (or their attendant costs) are unjust or unreasonable. Of note, though it does not constitute a ruling on the merits, the Commission stated in its *July 16 Order* that the Companies' proposed energy burden targets "appear to be consistent" with those recommended in its *Final Policy Statement and Order*.[13]

With the exception of its stated concern regarding the imposition of additional PCAP costs on residential customers during the ongoing pandemic, OCA fails to proffer either factual or legal support for its recommendation. Again, the Companies share this concern. However, unlike OCA, the Companies do not view it as dispositive. Indeed, the Companies submit that it would be incongruous to allow the economic tumult of the pandemic to delay or prevent the Companies from providing their PCAP-eligible customers the much-needed and fortuitously timed bill assistance reflected in the Companies' proposed energy burden modifications. Accordingly, the Companies request that the Commission reject OCA's recommendation and approve the Companies' proposed energy burden reductions without modification or further delay.

3. OCA's Proposed Cost-Control Measures Are Unwarranted and Unsupported.

In the event the Commission approves the Companies' energy burdens as proposed, OCA recommends that the PUC concomitantly impose various cost-control measures. Increasing the minimum payment; extending the length of time for arrearage forgiveness; capping the amount

[13] *July 16 Order* 12.

of arrearage forgiveness charged to ratepayers;[14] decreasing overall administrative costs; and revisiting and adjusting maximum CAP credits are among those it proposes.[15] The Companies disagree and therefore ask that the Commission deny OCA's request.

The principal basis for OCA's recommendation for the incorporation of additional cost controls is the fact that the Companies' PCAP costs are forecasted to increase during the period of the program. That alone, however, is an insufficient basis for additional cost-control measures. OCA has neither averred nor demonstrated that any of the cost components that underlie the Companies' projections are imprudent, unjust, unreasonable, or any combination thereof; inconsistent with the Commission's *Final Policy Statement and Order*;[16] or infelicitous in any way. Nor has OCA opined as to what it thinks would be an appropriate level of costs during the period of the Companies' 2019-2023 USECP.

In addition, OCA fails to demonstrate how the combination of the Companies' cost-control measures and those proposed in their Joint Plan are inadequate or in need of augmenting. Combined, they represent a robust suite of cost protections that strikes an appropriate balance between maintaining the Commission's energy burden thresholds for low-income customers (as set forth in its *Final Policy Statement and Order*) and shielding residential customers from undue

[14] The Companies ask that this request be rejected out of hand. The Competition Act states that all costs associated with universal service programs are entitled to full recovery via an appropriate cost-recovery mechanism. *See* 66 Pa.C.S. § 2804(8) and (9). Moreover, imposing such caps would force utilities to limit the number of participants or introduce other measures to ensure such caps are not exceeded.

[15] OCA *Comments* 10-11.

[16] Though unclear, OCA appears to intimate that the Companies' proposal to eliminate the maximum CAP credit contravenes the PUC's *Final Policy Statement and Order*, which, OCA claims, directs utilities to employ a tiered structure for any CAP credit limits the Companies impose. While the Companies agree that the PUC expressed a preference for CAP credit limits with tiered structures, the Companies are proposing to eliminate—not establish—a maximum CAP credit. Therefore, the Commission's preference in this regard is inapplicable. Moreover, the Commission found in its *Final Policy Statement and Order* it "is reasonable to allow utilities to establish and propose changes to their CAP credit limits, subject to justification on the record, as part of their USECPs", which is what the Companies have done. The Companies are proposing to eliminate the maximum CAP credit limit, rather than establish a modified version of one, because if a customer is required to pay a percentage of their income as the bill, then the bill should equal this amount. Everything else is credited off. However, if a subsidy limit is in place, some customers will end up paying more than their PIP as the bill amount, which would no longer be true to the PIP amount.

program cost increases. The proposed higher energy burden for customers above 50% FPL will increase this customer group's payment responsibility and reduce their available CAP subsidy and thereby help to control subsidy costs.[17] The proposed minimum bill for customers earning $600 or less per month would be greater than their percent of income payment ("PIP") percentage, which means he or she would pay more than the PIP and use less subsidy credit; this, too, in turn, would help control subsidy costs.[18] Presently, all customers are screened for the Companies' Low-Income Usage Reduction ("LIURP" or "WARM") measures at the time of the PCAP application; the highest users are directed to WARM for evaluation of available measures annually, and quarterly messages are provided to the highest users to provide education on conservation. If eligible, CAP customers are required to participate in WARM to reduce consumption through energy conservation improvements installed in the home, replacement of inefficient appliances, and energy education. Another present-day, cost-control measure in the Companies' PCAP is the forgiveness component: it is provided to customers at initial enrollment but not subsequent re-enrollments. In light of these current and proposed cost-control measures, OCA's failure to demonstrate through record evidence the inadequacy of these protections or the need for additional cost constraints, and the deleterious effect the adoption of OCA's proposed cost-control measures would have on the Companies' ability to establish and maintain the energy burdens provided in the PUC's *Final Policy Statement and Order*, OCA's request should be denied.

C. Points of Agreement

In its *Comments*, CAUSE-PA recommends that the Companies work with their USAC to develop a plan forcommunicating these programmatic changes to their customers and service providers that assist customers to prepare PCAP applications.[19] The Companies are amenable to

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[17] *See also Supplemental Information* (PDF page 8).

[18] *Id.*

discussing this during their next USAC meeting.

In its *Initial Comments*, OCA requests that the Companies be directed to provide a detailed plan addressing how the Companies intend to expand their CAP outreach to increase the CAP participation rate for customers with annual incomes less than 50% FPL. Such a plan should include a discussion of the activities that the Company intends to take and the quantitative outcomes by which the success (or lack thereof) can be measured.[20] The Companies are amenable to discussing this during their next USAC meeting.

D. CAUSE-PA's Requested Clarifications

According to CAUSE-PA, based on the documentation and information provided in the Companies' initial PCAP application, it is unclear whether that document communicates that customers may provide income documentation for the last 30 days or 12 months, whichever is beneficial to the customer, for determining eligibility. In the event it does not, CAUSE-PA recommends that the Companies be required to integrate this information into its initial PCAP application, if the Companies have not already done so.[21] The Companies wish to clarify that they do not currently have a paper application. Nevertheless, the Companies have updated their recertification letter and online system to reflect this change, as did the Dollar Energy Fund with respect to MyApp.[22]

To ensure that customers who cannot (or choose not to) provide information online or telephonically are provided with uniform procedures compared to other PCAP customers, CAUSE-PA recommends that the Companies be directed to ensure that the Commission's

[19] CAUSE-PA *Comments* 27.

[20] OCA *Comments* 26.

[21] CAUSE-PA *Comments* 25-26.

[22] *See Supplemental Information* (PDF page 15).

standardized zero-income form is implemented in a uniform fashion for customers who recertify electronically, telephonically, or on paper.[23] As the Companies stated in their *Supplemental Information* submission, the zero-income form is not available as a separate paper application; it is part of an online application. However, when a customer is mailed the recertification letter, the form includes a section that permits him or her to explain how food, shelter, and living expenses were met for the last 30 days.[24]

III. CONCLUSION

The Companies appreciate being given this opportunity to address the initial comments submitted in this proceeding regarding their Joint Plan. For the reasons stated herein, the Companies respectfully request that the Commission: (1) accept these *Reply Comments* (2) consider and adopt the positions therein, which support approval of the Companies' Joint Plan; and (3) approve the Companies' Joint Plan without further delay.

Respectfully submitted,

Dated: October 19, 2021

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[23] CAUSE-PA *Comments* 33-34.

[24] *See Supplemental Information* (PDF page 19).

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail, as follows:

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