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September 30, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street - P.O. Box 3265
Harrisburg, PA 17120-3265

SUBJECT: PECO Energy's Report on Alternative Models for the Delivery of Customer Assistance Program (CAP) Benefits Submitted Pursuant to the Commission's April 4, 2013 Order in Docket No. M-2012-2290911

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's (PaPUC) April 4, 2013 Order in Docket No. M-2012-2290911, PECO Energy Company was directed to test various models in search of both an Energy Burden Factor and CAP Credit Limit for each of PECO's 12 CAP groups that would improve the affordability of CAP to the participants. Additionally, PECO was directed to conduct an analysis of the fixed credit Percentage of Income Plan as it would apply to PECO's CAP customers.

Accordingly PECO Energy Company is hereby submitting to the PaPUC its Report on Alternative Models for the Delivery of CAP Benefits.

Thank you for your assistance in this matter and please direct any questions regarding the above to Dick Webster, Regulatory Policy & Strategy at (215) 841-5777.

Sincerely,

cc: Certificate of Service

**PECO Energy's Report on
Alternative Models for the Delivery of Customer Assistance Program Benefits
Submitted Pursuant to the Commission's April 4, 2013 Order in Docket No. M-2012-2290911**

PECO Energy Company ("PECO") submits this report pursuant to the Commission's April 4, 2013 Order in Docket No. M-2012-229091. In that Order, the Commission issued the following directive (pp. 24-25):

Accordingly, we shall direct PECO to test various models in search of both an EBF [Energy Burden Factor] and CCL [CAP Credit Limit] for each of PECO's 12 CAP groups that would improve the affordability of CAP to the participants while not placing more of a financial burden on the non-participants. We further direct PECO to conduct an analysis of the fixed credit PIP, using the information above, as it would apply to PECO's CAP customers and serve a full report to the Commission and parties to this proceeding by September 30, 2013.

Executive Summary

This report was ordered by the Commission as part of its ongoing evaluation of PECO's 2013-15 Three-Year Plan. In that proceeding, the Commission ordered PECO to continue to use its existing 7-tier rate discount Customer Assistance Program ("CAP") Plan (the "Status Quo" program), rather than moving to a Percentage of Income Plan ("PIP"). However, the Commission ordered PECO to conduct this evaluation of alternative models for potential implementation in 2016-18.

Options Considered

In this report, PECO provides data on four CAP models:

- PECO's current 7-Tier rate discount program (the "Status Quo");
- The 7-Tier CAP rate discount program with three refinements: (1) *redployment* of benefits from the highest tiers to the poorest tiers (2) *seasonally*-adjusted discounts, and (3) increases in the amount of kWh to which the discount applies to one *standard deviation* from average usage (the "7-Tier R/S/SD");

- The Percentage of Income Plan (“PIP”); and
- The Fixed Credit Option, (“FCO”) which provides each low-income customer with a fixed credit each month based on previous 12 month’s usage and price.

All four models are evaluated using PECO’s current default service pricing.¹

The Status Quo program is described in detail in PECO’s 2013-15 Three-Year Plan, currently on file with the Commission in this docket. The PIP is an alternative plan described in the Commission’s CAP Policy Statement.²

The FCO, which was initially raised in the testimony of Office of Consumer Advocate (“OCA”) witness Roger Colton, is a variation of the PIP model and primarily refers to a CAP program run by the Public Service Company of Colorado (PSCO).³ PSCO has been using the FCO approach for about 2-3 years to provide about \$6 million of benefits annually to its low-income customers; prior to implementing the FCO, PSCO had no low-income program. PSCO’s FCO program has not been evaluated to determine whether it delivers affordable service to low-income customers.

The 7-Tier Redeployment/Seasonality/Standard Deviation (“7-Tier R/S/SD”) option was also developed in discussions with Mr. Colton. This approach uses PECO’s existing 7-tier program as its base. PECO then takes some of the benefits that are currently being provided to the highest tiers in its program and “redeploys” those assets to the poorest of the poor in the lowest tiers. This is

¹ In the spring litigation in this docket, PECO provided similar data for the Status Quo and the PIP using the then-current price-to-compare. Because the evaluation of both cost and affordability of the programs changes as the price to compare changes, PECO has updated and presented data the Status Quo program and the PIP using the current price-to-compare.

² 52 Pa. Code §261 et seq.

³ PECO identified programs in New Jersey and Maryland that are similar to the FCO. To the extent that affordability evaluations of those similar programs have been performed, the results are reported here.

accomplished by changing the targeted percentage “affordability” goal that it uses for each tier, as follows:

- 98% affordability for Tiers A-C (0 to 50% FPL)
- 88% affordability for Tier D (51 to 75% FPL)
- 80% affordability for Tier D1-E1 (76 to 150% FPL)

This redeployment frees up substantial funds to provide additional benefits to the poorest of the poor.

The 7-Tier R/S/SD provides those benefits by making two additional adjustments. First, PECO adjusts the kWh to which discounts are to be applied to reflect seasonality (winter, summer, and shoulder months); second, at the suggestion of Mr. Colton, the 7-Tier R/S/SD provides discounts up to one standard deviation of usage rather than average usage. In some months, this approach results in rate discounts being provided for much higher kWh usage levels.

These four options were assessed across a variety of data points and outcomes, which are summarized in the table on the following page:

Table 1: Summary of Evaluation of CAP Options**(Costs in \$ Millions)**

Option/ Consideration	Status Quo	7-Tier R/S/SD	PIP	FCO
IT Costs	\$0	\$0	\$6.8-11.4	\$6.8-\$11.4
Change Management Costs	\$0	\$0	\$0.8	\$0.8
Shortfall	\$76.4	\$85.4	\$76.8	\$70.6
Shortfall With Bad Shopping Decisions (5% higher rate) by 30% of the CAP Population	\$77.1	\$86.1	\$77.9	\$70.8
Unaffordability (R/RH)	35/25	27/21	6/7	39/29
Unaffordability with 3% Usage Increase	36/25	27/21	6/7	57/34
Unaffordability With Bad Shopping (30% shopping, 5% higher rate)	36/25	27/21	6/7	49/30
Customers Who Get Zero Benefit	4,600	4,600	44,000	44,000
Impact on Bad Debt Expense	\$0	(\$1.4)	\$0	\$1.0
Impact on Terminations	0	(1500-2000)	1500-2000	2000-2500
Incentive to Conserve	Yes, above 650 kWh usage	Yes, above new higher monthly kWh usage limits	No	Yes, but muted based on previous 12 month's usage
Incentive To Shop Well	Yes, above 650 kWh usage	Yes, above new higher monthly kWh usage limits	No	Yes, but muted based on previous 12 month's usage

IT Transition Costs

PECO evaluated the IT transition costs for each option. The Status Quo obviously has no transition costs. Because the 7-Tier S/SD would use PECO's existing IT architecture, there would be essentially \$0 in IT transition costs for that option, as well. In the spring litigation, PECO estimated that the PIP would cost between \$6.8- \$11.4 million in transition costs. The FCO, as a variation of the PIP would also be quite expensive – from \$6.8 - \$11.4 million. These IT transition costs are significant and,

if the Commission orders PECO to implement one of the more expensive IT options, PECO will seek full and current recovery of those costs.

Change Management Costs

The PIP and the FCO use rate discount architectures that would be completely new to the PECO system. Implementing these new systems would require training of PECO personnel, customer outreach, and development of new forms and training materials. PECO estimates that, for the PIP and FCO, these change management costs would be approximately \$700,000 to \$800,000.

Costs of Discounts ("Shortfall")

The largest cost associated with any CAP program is the aggregate dollar amount of discounts provided to low-income customers (typically referred to as the "shortfall"). At PECO's current default service generation pricing, its Status Quo program has a shortfall of \$76.4 million per year. The 7-Tier S/SD would have a shortfall of \$85.4 million. The PIP would have a shortfall of \$76.8 million, while the FCO would have a shortfall of \$70.6 million.

Because the various options place greater or lesser degrees of responsibility on the low-income customers, the overall program costs change at different rates with certain external events. To test the sensitivity of these four models to such changes, PECO looked at the cost that would be expected if 30% of the CAP customers made a bad shopping decision, with "bad" being defined as paying 5% more than the price-to-compare ("PTC"). The PIP shows the most cost volatility to such changes, with a \$1.7 million change. The Status Quo and the 7-Tier R/S/SD each show a small cost increase of \$0.7 million, while the FCO puts essentially full responsibility for bad shopping decisions on low-income customers, and thus shows virtually no change in costs when bad shopping occurs.

Unaffordability

One of the primary measures of success for a CAP program is whether it delivers affordable service to customers. Affordability, in turn, can be measured in a number of ways. First is coverage of bills paid. The Commission seeks an 80% coverage ratio. PECO's Status Quo program achieves an 82% ratio. The Colorado evaluation suggests that the Colorado FCO is slightly lower, at 80%.

The second measure of affordability, and the one historically used by the Commission to evaluate its CAP programs, is breadth of affordability – that is, the percent of customers that meet the target affordability as described in the PIP section of the PUC's CAP Policy statement. On that measure, the Status Quo has some challenges, which were the genesis of this proceeding – 35% of Rate R customers, and 25% of Rate RH customers, currently receive unaffordable bills. The 7-Tier R/S/SD option provides improvement on breadth of affordability, with 27% of Rate R and 21% of Rate RH customers receiving unaffordable bills. The FCO provides breadth of affordability that is inferior to the Status Quo, with 39% of Rate R customers and 26% of Rate RH customers receiving an unaffordable bill. As reported in the spring litigation, the PIP provides unaffordable bills to 6% and 7% of the respective populations.

Breadth of affordability is affected to varying degrees by relatively minor changes in external conditions, with the FCO showing the greatest sensitivity to external changes. For example, with minor (3%) changes in customer usage, affordability remains about the same in the Status Quo, the 7-Tier R/S/SD, and PIP, but in the FCO Rate R unaffordability increases from 39% to 57% for Rate R. Similarly, in the bad shopping scenario described above, FCO Rate R unaffordability increases from 39% to 49%. In comparison, the Status Quo, 7-Tier R/S/SD and the PIP show virtually no increase in unaffordability in this scenario.

A third measure of affordability, known as “depth of affordability,” has more recently entered the discussion regarding CAP programs. While “breadth” of affordability refers to whether a customer is, or is not, attaining their affordability target, “depth” of affordability refers to the average amount by which a CAP customer misses their affordability target. The FCO has better affordability against this measure, with an average depth of unaffordability in Rate R of \$124 vs. \$447 for the Status Quo.

Customers Who Receive No Discount

In each of the programs, the program design causes some of the CAP customers to receive a zero benefit. These design effects are discussed in more detail in the body of this report. PECO estimates that approximately 4,600 CAP customers receive zero benefit in the Status Quo and the 7-Tier R/S/SD. This number is significantly higher in the PIP and FCO, with approximately 44,000 customers receiving a zero benefit.

Bad Debt Expense:

These alternative models may also affect PECO’s bad debt expense. PECO estimates that the 7-Tier R/S/SD, because it improves affordability, would also improve PECO’s bad debt expense by \$1.4 million per year. The FCO, on the other hand, degrades breadth of affordability and PECO expects that it would also cause an increase in bad debt expense of approximately \$1 million per year.

Effect on Terminations:

As bad debt expense changes, PECO also changes its terminations. Since the 7-Tier R/S/SD is expected to improve bad debt expense, terminations should decrease under that program; conversely, in the PIP and the FCO increased bad debt -- as well as the fact that approximately 44,000 low-income customers will be losing benefits that they have received in the past -- is expected to cause an increase in terminations.

Usage & Price Signals

Different models provide differing levels of price signals, which are important in incenting customers to conserve and to make good shopping decisions. The Status Quo provides strong price signals above 650 kWh per month usage. The 7-Tier R/S/SD provides the same form of price signals, but only after a higher level of monthly usage. The PIP provides no price signals. The FCO provides price signals that are limited to inducing the customer to match their prior year's usage and price.

Conclusion

PECO's Status Quo, the 7-Tier R/S/SD, the PIP and the FCO are four different approaches to delivering resources to PECO's CAP population. Each approach has advantages and disadvantages.

PECO's Status Quo has some problems with breadth and depth of affordability, but achieves an acceptable payment/coverage ratio. It also provides clear price and usage signals to customers.

The 7-Tier S/SD option improves over the Status Quo in both breadth and depth of affordability, it continues to provide price and usage signals to customers, but it does so at an additional shortfall cost of approximately \$9 million per year.

The PIP has improvements in breadth and depth of affordability. The shortfall costs are approximately the same as PECO's Status Quo program, yet approximately 44,000 customers (30% of CAP customers) lose all CAP discounts. Also a PIP provides no price or usage signals to customers. IT transition costs are considerable at a range of \$6.8M to \$11.4M.

The FCO has substantially worse breadth of affordability, but improved depth of affordability. Overall, FCO shortfall is lower but the IT transitions costs are substantial between \$6.8 and \$11.4 million in costs to implement. As in the PIP program, approximately 44,000 customers will lose all CAP discounts. PECO low-income customers are familiar and used to its CAP tiered program. In both the PIP

and FCI programs, additional funding will be needed to educate our low-income customers regarding these changes as well as on on-going certification processing.

Given this data, PECO does not see any clear, comprehensive advantage to moving to either the 7-Tier R/S/SD or the FCO, and therefore recommends that it continue with its Status Quo program.

1. Background of the Commission proceeding leading to this report.⁴

Every three years, PECO (along with other major jurisdictional utilities) submits a “Three-Year Plan” describing its proposed Universal Service programs. This proceeding involves PECO’s Three-Year Plan for the period 2013-2015.

In February 2012, PECO submitted its 2013-15 Three-Year Plan to the Commission. On November 8, 2012, the Commission entered a Tentative Order approving PECO’s Plan in part, but directing PECO and other stakeholders to conduct an evidentiary proceeding to evaluate possible alternative models for PECO’s Customer Assistance Program (“CAP”). That evaluation occurred in January – March of 2013, and focused primarily on PECO’s current 7-tier rate discount CAP program and an alternative known as a “Percentage of Income Plan,” or “PIP.” The parties reviewed a broad array of end points for each alternative, including IT transition costs, amount of CAP “shortfall”, achieved affordability, impact on bad debt expense and termination, number of customers who would receive no benefits under a given plan, and the “fit” of each alternative with shopping and conservation programs.

On April 4, 2013, the Commission issued an Order directing PECO not to implement a PIP, but instead to continue with its current 7-tier rate discount CAP program. However, the Commission directed PECO to review an option that was raised during litigation, known as the “Fixed Credit Option,” or “FCO,” as well as other alternative models for delivering Universal Service benefits to PECO’s low-income customers. The Commission directed PECO to prepare this report, which will be followed by periods for comments and reply comments by the stakeholders. The Commission further stated (p. 25) that the alternatives evaluated in this report are under consideration for 2016-2018.

⁴ More extensive background on the history of this proceeding is set forth at pages 2-8 of the Commission’s April 4, 2013 Order.

2. Four CAP models are evaluated in this report.

First, PECO provides data on its Status Quo program.

Second, PECO evaluates a variation on its existing 7-tier program that redeploys benefits from the higher to the lower tiers, that incorporates seasonality of usage and that increases the monthly kilowatt hours (“kWh”) to which rate discounts are applied from the existing level (nominally 650 kWh per month) to an amount equal to one standard deviation of usage. (The “7-Tier R/S/SD.”) This approach results, for example, in discounts being given up to 1350 kWh in some months.

Third, PECO includes updated data for a PIP (updated with new generation costs) to provide more evaluation comparisons in the alternatives.

Fourth, as directed by the Commission, PECO evaluates the FCO, as discussed by OCA witness Roger Colton in the 2013 spring litigation.

For purposes of this evaluation, PECO has updated its model to reflect the default service generation prices currently in place in its tariff.

A. Background on the FCO – Fixed Credit Option

In his testimony in this proceeding, OCA witness Roger Colton provided extensive testimony regarding the FCO currently in use by Public Service Company of Colorado (“PSCO”). Essentially, in the FCO the utility reviews the individual usage and price paid in a test year by each individual low-income customer. The utility then calculates how much of a credit the customer would need to receive in the next year in order to receive affordable service – assuming the customer had precisely the same usage and paid precisely the same price for generation. This calculated amount, which differs for each

customer, is then divided by 12 and becomes the “fixed credit” that appears on the customer’s bill each month.⁵

The PSCO FCO program is relatively new – about two or three years old. It is the first low-income assistance program run by the Public Service Company of Colorado. Approximately 15,000 low-income customers are served by the program, and approximately \$6 million per year of benefits are provided by the program. To date, the Colorado FCO program has not been evaluated to determine whether it delivers affordable service to Colorado low-income customers.⁶

PECO also determined that FCO-equivalent programs are in place in New Jersey (on a statewide basis run by the New Jersey Board of Public Utilities) and by one Maryland utility. The Maryland program has been evaluated, but that evaluation does not include an evaluation of affordability. The New Jersey program was reviewed for affordability by the Applied Public Policy Research Institute for Study and Evaluation (“APPRISE”), the same entity that provided the affordability data in this report. The New Jersey results are included below in the discussion of affordability.

In general, as reported in more detail below, the FCO option causes some degradation in breadth of affordability, but some improvement in depth of affordability.

B. Background on the 7-Tier R/S/SD.

During the 2013 spring litigation, PECO engaged in discussions with the other stakeholders regarding potential enhancements to its Status Quo program. One of those enhancements was the potential to redeploy some benefits from higher to lower tiers. These benefits

⁵ Pro forma bills under the FCO model are attached as Appendix A.

⁶ The Colorado FCO program was evaluated by Mr. Colton’s group in February 2012, but that evaluation did not contain an analysis of either breadth or depth of affordability. PECO’s modeling of the FCO is based upon its review of Mr. Colton’s testimony, subsequent discussions with Mr. Colton, review of Mr. Colton’s February 2012 evaluation of the Colorado FCO, and extensive discussions with the program manager of the Public Service Company of Colorado FCO program.

would then be paid to the lower tier customers up to much higher levels of usage, with a seasonality component put into the rates (for winter, summer, and shoulder months). PECO had previously modeled average usage for each month as the target kWh level for which benefits would be supplied; Mr. Colton requested that PECO model one standard deviation of usage from the norm. PECO did preliminary evaluations of that approach during the litigation,⁷ and provides more detailed data on a 7-Tier R/S/SD in this report.

Providing discounts up to one standard deviation of usage, rather than average usage, results in providing discounts to a much higher level of usage.⁸ Consequently, as reported in more detail below, this approach improves affordability, but at an increased cost. It is worth noting that additional adjustments to this model could be made to balance the overall costs and affordability (i.e. such as lessening the usage levels the discount is applied to).

3. IT Transition costs

In the evidentiary hearings in this matter, PECO put on substantial evidence regarding the IT transition costs that would be associated with moving from its current tiered program to a PIP. This evidence is discussed at pages 5-7 of PECO's brief. In summary:

- PECO's annual IT capital budget for 2013 is \$11.5 million.
- When PECO's affiliate utility, ComEd, recently reprogrammed for a simpler version of the PIP, its IT transition costs exceeded \$8 million, most of which is currently being recovered in retail rates.

⁷ The litigation evaluation was for a potential 12-tier rate discount program. While PECO is not currently pursuing a 12-tier program, the results of that analysis were sufficiently interesting to warrant further investigation into the seasonality/standard deviation concept. The simpler 7-tier R/S/SD is evaluated in this report.

⁸ Discounts would be provided to the following usage levels: Rate R -- 1125 kWh for winter (Dec, Jan, Feb, Mar), 815 kWh for shoulder months (Apr, May, Oct, Nov) and 1300 kWh for summer (Jun, Jul, Aug, Sep). Rate RH -- 2500 kWh for winter, 1300 for shoulder months, and 1300 for summer.

- Using its standard IT cost estimating tools, PECO estimated that moving to the more complex PIP being evaluated in the spring evidentiary hearings could cost as much as \$12.8 million.

For this report, PECO conducted an in-depth IT evaluation of the likely programming costs of moving respectively to the FCO and to the 7-Tier S/SD options. PECO's evaluation confirmed PECO's prior estimate that moving to a PIP of any form, including the FCO, would be significant. The new updated costs have not changed substantially but are now in the range of \$6.8-\$11.4 million.⁹

The 7-Tier R/S/SD approach would be based on existing programming. In PECO's existing CAP tier program, whenever PECO's underlying rates change, its Rates Department calculates new discount percentages to be applied in each CAP tier. The 7-Tier R/S/SD approach uses the same IT framework, but the periodic calculation of new discount percentages would simply be based upon different target goals and usage limits. PECO anticipates that no additional IT programming would be needed to accomplish this approach. The IT transition costs can thus be summarized as:

Table 2
Comparison of IT Transition Costs

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
\$0	\$0	\$6.8 – 11.4	\$6.8 – 11.4

4. Change Management Costs

The PIP and the FCO use rate discount architectures that would be completely new to the PECO system. Implementing these new systems would require training of PECO personnel, customer

⁹ Additional information regarding the development of these costs is provided in Appendix B.

outreach, and development of new forms and training materials. PECO estimates that, for the PIP and FCO, these change management costs would be approximately \$700,000 to \$800,000.

Table 3
Comparison of Change Management Costs

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
\$0	\$0	\$0.8	\$0.8

5. “Shortfall” Costs

The largest cost associated with any low-income program is known as the “shortfall.” The shortfall is the aggregate dollar amount of discounts that are provided to low-income customers through the program. In comparing shortfall costs across programs, two elements dominate the analysis. First, at any given level of generation pricing, each program will cause a calculable shortfall. Table 4 provides this snapshot comparison using PECO’s June 2013 default service generation pricing.¹⁰

Table 4
Comparison of CAP “Shortfall” Costs (millions)
June 2013 Default Service Generation Prices

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO PIP
\$76.4	\$85.4	\$76.8	\$70.6

Second, the costs of some program approaches are more sensitive to changes in generation pricing or customer usage. Generally, approaches that place the responsibility for increased usage or prices on the low-income customer, such as PECO’s Status Quo CAP program, show less shortfall

¹⁰ Detailed data on shortfall and affordability are provided in Appendix C.

volatility in response to usage or price changes. Table 5 provides comparative data for these programs that provides an example of this volatility. In Table 5, PECO assumes that 30% of the low-income customers shop and pay 5% more PECO's default price for their generation:

Table 5

**Comparison of CAP "Shortfall" Costs (millions)
Assuming 30% of CAP Customers Shop and Pay 5% More Than June 2013 Default Service Generation Prices**

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
\$77.1	\$86.1	\$77.9	\$70.8
Increase in Shortfall			
\$0.7	\$0.7	\$1.1	\$0.1

Because the FCO places all responsibility for price and usage changes on the customer, it does not have price volatility from changes in achieved (shopping) prices. The other programs, which variously split the cost responsibility for shopping and use decisions between the low-income customers and other customers, show varying degrees of shortfall volatility, with the PIP showing the highest degree of volatility.

6. Unaffordability

As discussed in the spring litigation, there are several methods of measuring affordability.

First, the Commission has a target of CAP customers paying 80% of the bills rendered to them. PECO's Status Quo program achieves an 82% coverage rate,¹¹ and therefore is deemed by this measure to provide an acceptable level of affordability of service.

¹¹ For the three-year period 2009-2011, PECO's CAP participants paid 82.6% of their CAP budget bills. See Testimony of Lauren B. Feldhake, PECO Statement No. 1, p. 30.

PECO did not model potential coverage rates for the various alternatives. However, Mr. Colton's evaluation of the Colorado FCO states that: "Low-income customers who had participated in PEAP for more than 12 months had customer payment coverage ratios of roughly 80%."¹² The Colorado PEAP program has some elements beyond the FCO, so it is not certain that this number is attributable directly to the FCO, but it is clear that the overall Colorado program, which includes the FCO, has a coverage ratio at or slightly below the PECO Status Quo.

The second measure is known as "breadth" of affordability. As discussed in the Commission's regulations, this measure looks to the question of whether a program delivers a bill that falls either above or below a specified percentage of the customer's income (usually 2-7% being the acceptable energy burdens.) This has been one of the Commission's typical measurements of affordability for many years. Indeed, one of the primary reasons for the spring litigation and for this report is because the Status Quo program shows weaknesses against the breadth of affordability measure.

PECO's analysis demonstrates¹³ that the FCO has degraded breadth of affordability, moving from 35% unaffordability in the Status Quo to 39% unaffordability in the FCO.¹⁴

¹² Colorado Evaluation, p. viii.

¹³ The body of this report provides summary results on unaffordability. Full results, by tier, are provided in Appendix C.

¹⁴ This result is consistent with the data results from the New Jersey FCO program. In an evaluation performed for the New Jersey Board of Public Utilities, APPRISE concluded that the New Jersey program delivered bills that exceed the target energy burden (and are thus deemed to be unaffordable) for 40% of electric-only customers, 48% of gas-only customers, and 45% of combination customers. See *Impact Evaluation and Current Process Evaluation of New Jersey Universal Service Fund, Final Report*, April 2006, p. 100.

Table 6

Unaffordability Under Current June 2013 Default Service Generation Prices

	Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
R	35%	27%	6%	39%
RH	25%	21%	7%	26%

PECO performed two sensitivity analyses to determine the effect of external changes on breadth of affordability. First, since affordability in the FCO is predicated upon the assumption that each customer will be able to precisely mimic their usage pattern from the prior year, PECO assumed that customer's would in fact change their usage by a small amount – 3% each month, with half of the months being an increase of usage of 3%, and half of the months being a 3% decrease in usage. Affordability in the FCO was extremely sensitive to such a minor change, with Rate R unaffordability rising to 57% in this scenario:

Table 7

Unaffordability Assuming a 3% Change in Monthly Usage, With Half of the Months Showing a 3% Increase, and Half Showing a 3% Decrease

	Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
R	36%	27%	6%	57%
RH	25%	21%	7%	34%

PECO's second sensitivity run addresses the possibility of "bad shopping" decisions by the CAP customers. In this scenario, PECO assumes that 30% of the CAP customers make a bad shopping decision, paying 5% more for their generation than the price-to-compare ("PTC"). Again, affordability in the FCO was extremely sensitive to this scenario, moving to 49% unaffordability:

Table 8

Unaffordability Assuming That 30% of CAP Customers Shop Poorly, Purchasing Generation at 5% Higher than the Price to Compare

	Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
R	36%	27%	6%	49%
RH	25%	22%	7%	30%

Finally, the measure known as “depth of affordability” was presented in the spring litigation. While this is not a measure that is addressed in the Commission’s regulations, and is not one of the measures historically used by the Commission to evaluate CAP programs, the data nonetheless adds to knowledge of strength and weaknesses of the programs. On the depth of affordability measure, the FCO fares well¹⁵:

Table 9

Depth of Unaffordability

	Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
R	\$447	\$351	\$77	\$124
RH	\$652	\$544	\$206	\$253

7. Customers who receive zero benefit.

The Commission’s CAP Policy Statement provides target affordability ranges for various income levels.¹⁶ For example, an electric only customer with income in the range of 51-100% of the Federal

¹⁵ The FCO also does well for depth of affordability under both sensitivity scenarios . Full results are provided in Appendix C.

¹⁶ The target ranges are part of the Policy Statement’s discussion of a PIP approach. However, these targets have been generally used by witnesses as one measure of affordability for the various program approaches.

Poverty Level has a target affordability of 6-7% of their income. Many of PECO's CAP customers do not need a CAP benefit to attain the lowest levels of "affordability."

The different models treat such customers differently. Most simply, the tiered models – the Status Quo and the 7-Tier R/S/SD – will provide a small benefit to such a customer. Often, this small benefit will leave the customer's affordability within the Commission-defined acceptable target range of affordability. This is an intentional outcome of the tiered approach, and it reflects the judgment that, for many low-income customers, it is appropriate to give them a benefit that takes them beyond the lowest edge of affordability. The discount, or benefit, may only be \$100 a year, but it nonetheless flows to the customer because of the mechanism of the tiered program .

PECO's CAP program has approximately 140,000 enrollees. The tiered models – the Status Quo and the 7-Tier R/S/SD – provide some degree of benefit to almost all of those customers, with only 4,400 CAP customers receiving no benefit.

The PIP and FCO, on the other hand, are designed to provide precisely the dollar amount of benefit that is necessary to achieve the targeted affordability level. This precision was discussed at length in the testimony of Mr. Colton and Dr. Gil Peach¹⁷ in the spring litigation. One of the effects of this precision is that, if a customer achieves the targeted level of affordability based upon their income level (and, in the case of the FCO, prior usage and price), then they will receive no CAP benefit. Thus, the individuals who attained the lowest level of their affordability, and who nonetheless receive a small benefit in the tiered programs, receives a zero benefit in the PIP and FCO.

There are a surprisingly large number of customers who fall into this category in PECO's service territory. PECO's modeling shows that approximately 44,000 customers (over 30% of all PECO CAP customers) would receive a \$0 benefit under an FCO. This is an increase of nearly 40,000 families who

¹⁷ Dr. Peach appeared on behalf of the low-income advocates.

are currently receiving a benefit (and would continue to receive it in a 7-Tier R/S/SD), but would not receive a benefit under an FCO or PIP.

Table 10

Number of Customers in PECO's Current CAP Population Who Would Receive a \$0 Benefit

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
4,600	4,600	44,000	44,000

8. Effect on bad debt expense

When a CAP program alternative provides a customer with additional benefits compared to the Status Quo, PECO expects that customer's bad debt profile to improve. Conversely, when a customer loses some of their existing benefits, PECO expects that customer's bad debt profile to degrade.

As noted in the previous section of this report, one of the primary features of alternatives to PECO's Status Quo is that they may take existing benefits away from customers. Often, but not always, these benefits are then redeployed to other low-income customers. These additions and subtractions can be used to estimate a net effect on PECO's bad debt expense.¹⁸ Table 11 provides that comparison:

Table 11

Comparison of Net Change to Bad Debt Expense (millions)

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
\$0	-1.4\$ (decrease)	\$0	\$+1.0 million (increase)

¹⁸ PECO's methodology for the bad debt calculation is set out at length in the testimony of Lauren B. Feldhake and in PECO's Brief.

9. Terminations

When customer bad debt increases, PECO must increase its service termination activity to control that bad debt. Consequently, because the programs are expected to cause a change in bad debt expense, they are also expected to cause a change in terminations.¹⁹

Table 12
Comparison of Net Change in Terminations

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
0	-1,500 to -2,000	+1,500 to +2,000	+2,000 to +2,500

10. Effect on conservation/good shopping decisions.

Low-income programs, to varying degrees, expose the low-income programs to price and usage signals. For example, PECO's Status Quo program provides discounts up to a nominal 650 kWh of usage per month, beyond that level, all usage is paid for by the customer at an undiscounted rate. This price signaling helps the customer to make decisions to conserve energy (if usage will exceed 650 kWh per month) and, when shopping, to make a good shopping decision (because usage above 650 kWh will be the full responsibility of the low-income customer.)

At the other end of the spectrum is the full PIP, in which the low-income customer is given no price signals and is not responsible for either increased usage or for good shopping decisions. In the

¹⁹ PECO's methodology for the termination calculation is set out at length in the testimony of Lauren B. Feldhake and in PECO's Brief.

spring litigation, all of the parties agreed with the basic comparison set forth above. PECO believes that this was an important basis for the Commission's rejection of the PIP.²⁰

The 7-Tier R/S/SD option is a tiered program, and thus provides price signals similar to the Status Quo. It should be noted, however, that because the discounted kWh are often much higher in the 7-Tier R/S/SD, the signal to conserve, and to shop well, is not as pronounced as in the Status Quo program.

The FCO places full responsibility for year-over-year price and usage changes on the low-income customers, and thus does provide price signals for conservation and good shopping. It should be noted, however, that because the FCO is designed to make service affordable as long as the customer's price and usage parallels the prior year's usage, the price signals simply drive the customer to try to match their prior year's usage and price, not to improve upon them. PECO thus views the FCO price signals to be present, but somewhat muted as compared to the Status Quo.

Table 13

Price Signals Provide an Incentive to Conserve and to Shop Well?

Current 7-Tiers (Status Quo)	7-Tier R/S/SD	PIP	FCO
Yes, above 650 kWh usage	Yes, above higher monthly kWh usage limits	No	Yes, but muted compared to Status Quo

²⁰ In its recent Three-Year Plan filing, PPL has proposed to eliminate its existing PIP program. That proposal is currently in front of the Commission.

11. Summary and Recommendation:

PECO's Status Quo, the 7-Tier R/S/SD, the PIP, and the FCO are four different approaches to delivering resources to PECO's CAP population. Each approach has advantages and disadvantages.

PECO's Status Quo has some problems with breadth and depth of affordability, but achieves an acceptable payment/coverage ratio.

The 7-Tier S/SD option improves over the Status Quo in both breadth and depth of affordability, but does so at an additional shortfall cost of approximately \$9 million per year.

The PIP was rejected by the Commission in the spring litigation, primarily due to IT Transition Costs, shortfall volatility, and poor "fit" for shopping and conservation.

The FCO has substantially worse breadth of affordability and improved depth of affordability, but would cost between \$6.8 and \$11.4 million in IT transition costs to implement. Its shopping and conservation signals are also muted as compared to the Status Quo.

Given this data, PECO does not see any clear advantage to moving to either the 7-Tier R/S/SD or the FCO, and therefore recommends that it continue with its Status Quo program.

Appendix A

Pro Forma Bills

FCO Model

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate R
CAP B
Monthly kWh Usage 617

ESTIMATED BILL 2013 Rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
ALL kWh	\$0.0610	\$37.64
GENERATION CHARGE		
ALL kWh	\$0.0786	\$48.50
TRANSMISSION CHARGE		
ALL kWh	\$0.0075	\$4.63

FCO PIP Monthly Credit	(\$83.17)
------------------------	--------------------

SUB - TOTAL		\$14.68
STAC	-0.21%	(<u>\$0.09</u>)
TOTAL		\$14.59

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate R
CAP C
Monthly kWh Usage 601

ESTIMATED BILL 2013 Rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
ALL kWh	\$0.0610	\$36.66
GENERATION CHARGE		
ALL kWh	\$0.0786	\$47.24
TRANSMISSION CHARGE		
ALL kWh	\$0.0075	\$4.51

FCO PIP Monthly Credit	(\$70.67)
------------------------	-----------

SUB - TOTAL		\$24.83
STAC	-0.21%	<u>(\$0.09)</u>
TOTAL		\$24.74

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate R
CAP D
Monthly kWh Usage 626

ESTIMATED BILL 2013 Rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
ALL kWh	\$0.0610	\$38.19
GENERATION CHARGE		
ALL kWh	\$0.0786	\$49.20
TRANSMISSION CHARGE		
ALL kWh	\$0.0075	\$4.70

FCO PIP Monthly Credit	(\$25.78)
------------------------	--------------------

SUB - TOTAL		\$73.39
STAC	-0.21%	(<u>\$0.10</u>)
TOTAL		\$73.30

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate RH

CAP B

Monthly Winter kWh Usage 1625

ESTIMATED BILL

2013 rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
All kWh - Winter	\$0.0416	\$67.60
All kWh - Summer	\$0.0610	
GENERATION CHARGE		
All kWh	\$0.0786	\$127.73
TRANSMISSION CHARGE		
All kWh	\$0.0075	\$12.19
FCO PIP Monthly Credit		
		(\$136.36)
SUB - TOTAL		\$78.24
STAC	-0.21%	(\$0.16)
TOTAL		\$78.09

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate RH
 CAP C
 Monthly Winter kWh Usage 1619

ESTIMATED BILL

2013 Rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
All kWh - Winter	\$0.0416	\$67.35
All kWh - Summer	\$0.0610	
GENERATION CHARGE		
All kWh	\$0.0786	\$127.25
TRANSMISSION CHARGE		
All kWh	\$0.0075	\$12.14

FCO PIP Monthly Credit	(\$110.25)
------------------------	------------

SUB - TOTAL		\$103.59
STAC	-0.21%	(\$0.16)
TOTAL		\$103.43

PECO Energy CAP Redesign
Docket No. M-2012-2290911
FCO Bill Calculation

Rate RH

CAP D

Monthly Winter kWh Usage 1590

ESTIMATED BILL

2013 Rates

CUST CHG	\$7.09	\$7.09
DISTRIBUTION CHARGE		
All kWh - Winter	\$0.0416	\$66.14
All kWh - Summer	\$0.0610	
GENERATION CHARGE		
All kWh	\$0.0786	\$124.97
TRANSMISSION CHARGE		
All kWh	\$0.0075	\$11.93
FCO PIP Monthly Credit		(\$75.51)
SUB - TOTAL		\$134.62
STAC	-0.21%	(\$0.15)
TOTAL		\$134.47

Appendix B

IT Transition Cost Detail

Appendix B
CAP Redesign - Fixed Credit Option
Cost Estimate

PLAN PHASE	Range		Assumptions
	Low	High	
Project Management (Contractor)	\$ 118,608	\$ 148,260	Project Mgmt, Enh Arch, PA, CDW Mgmt
Project Management (Exelon)	\$ 28,560	\$ 35,700	Key Mgmt, PMO, PMO Finance
Business SME/Change Mgmt Costs	\$ 7,742	\$ 9,678	
Execution Contingency	\$ 7,746	\$ 9,682	5% of total phase delivery
Total	\$ 162,656	\$ 203,319	

ANALYZE PHASE	Range		Assumptions
	Low	High	
Project Management (Contractor)	\$ 153,264	\$ 168,590	Project Mgmt, Enh Arch, PA, CDW Mgmt
Project Management (Exelon)	\$ 30,300	\$ 33,330	Key Mgmt, PMO, PMO Finance
Business SME/Change Mgmt Costs	\$ 12,288	\$ 13,517	
Execution Contingency	\$ 9,793	\$ 10,772	5% of total phase delivery
Total	\$ 205,645	\$ 226,210	

DELIVERY PHASE	Range		Assumptions
	Low	High	
Project Management (Contractor)	\$ 486,200	\$ 826,540	Project Mgmt, Enh Arch, PA, CDW Mgmt
Project Management (Exelon)	\$ 299,200	\$ 508,640	
System Integration	\$ 5,198,600	\$ 8,837,620	Development less production support and SI O&M costs, includes program gmt, project lead, delivery development testing and PA, CDW reporting development and conversion costs
Business Integration/Change Mgmt Costs	\$ 500,000	\$ 850,000	
Total	\$ 6,484,000	\$ 11,022,800	

TOTAL PROJECT	Range		Assumptions
	Low	High	
FCO Full Project Cost Estimate	\$ 6,852,301	\$ 11,452,329	



An Exelon Company

Estimate Review

CAP Redesign – Fixed Credit Option

8/16/2013

Project Overview

2

- ✓ The FCP PIP is a variation on a straight PIP program.
- ✓ In this Scenario:
 - The customer is designated a fixed amount of annual dollar credit based on the difference between the Customer's annual bill, which is based on their previous 12 months of undiscounted usage, and their Energy Burden, established by the PUC based upon their Federal Poverty Level and Household size.
 - This is then used to determine their next 12 months of monthly credits that will be applied against their bill
- ✓ Total Costs for the project are estimated between \$6.8M to \$11.4M

Fixed Credit Option

3

- ✓ The below data is what will be needed to determine what the FCO amount will be. A CAP customer will be assessed when they enter CAP and for every 12 month period thereafter, if they remain on CAP
 - (A) Customer's Total Annual Gross Income
 - (B) Rate Type (either Electric Heat, Electric Non-heat, Gas)
 - (C) Federal Poverty Level (*which is determined from their Total Annual Gross Income and the number of people in their Household*)
 - (D) Energy Burden Amount applicable to rate and FPL (from B and C above)
 - See appendix for table to determine their annual Affordable Bill
 - (E) Total undiscounted billings from previous 12 months (**or proxy if unavailable*)
 - Amount must include supplier billing, if applicable

✓ Calculations:

- $A * D = x$ (Annual Affordable Bill Amount)
- $E - X =$ Annual Discount Amount
- $x / 12 =$ monthly credit
- ****may want to consider standardizing a seasonalized credit amount across the months so that higher credits given during the winter/summer high usage months and lower in shoulder months**

	FPL 0-50%	51-100%	101-150%
Electric Heat	7-13%	11-16%	15-17%
Electric Non-Heat	2-5%	4-6%	6-7%
Gas	5-8%	7-10%	9-10%

Estimating Assumptions & Variables

4

- ✓ Work to begin early October 2014, pending IT PRC/PRC/PARC/CLA authorization
 - Because authorization takes 1.5 months for IT projects > \$1M, the EU process would need to begin end of July 2014 and go through mid-September
 - The true delivery date for the project will depend upon a detailed analysis of the modules to determine cross impacts which could delay the ability to implement changes
 - This analysis will occur throughout Plan & Analyze phases of the project
- ✓ Estimate includes time for a BICM (business integration/change management) resource in both, plan and analyze phase.
- ✓ Estimate includes BICM Delivery Phase costs
- ✓ Estimate does not include costs associated with execution of Training and Communications.
- ✓ The change from the existing CAP Rate structure to an FCO PIP will involve a significant conversion component .
 - Details will be defined during Plan/Analyze but it will involve moving customers off the existing rate structure, calculation of FCO amount, forgiveness of PPA balances, setup of budget bill amounts, etc
 - This cutover complexity is reflected in the delivery estimate
- ✓ Significant reporting impacts are expected in order to disable or revise existing CAP Reports along with the creation of new reports to support the Fixed Credit Option
- ✓ Assuming GAS FCO Customers will not be allowed to shop, as it is today
- ✓ Much of the cost for the project is driven from the need to eliminate throughout the various systems all logic that is currently based upon the CAP Process (collections, revenue management, enrollments, etc)

Impacted BU Process & Department Assumptions

5

✓ PROCESSES:

- Collections Processes → Ensure that existing processes for CAP are updated to follow the FCO rules
 - All CAP Processes would need to be either updated or turned off to ensure that they are no longer applicable as FCO begins
- CAP, Assistance Program, and Budget billing → Changes to support the FCO program within the billing engine including the calculation and minimum bill logic.
- Supplier Enrollment → impacted due to the fact that GAS CAP customers cannot shop currently.
- AR Adjustments → Changes to support elimination of existing PPA balances at cutover.

✓ DEPARTMENTS:

- Regulatory → Address the cutover from the existing CAP rate structure to the FCO option as well as the minimum bills.
- Training → Significant training impacts are expected.
- Communication → Significant impacts to address both internal and external communication about the new program and how it will impact customers.
- Other potentially impacted business departments are System Billing, Call Center, Revenue Accounting and Energy Acquisition

Plan Phase Estimate & Deliverables

6

Refined Plan Phase Estimate (\$163k - \$203K)

Plan Phase Deliverables:

- Project Plan
- Stakeholder Engagement Plan
- Communication Plan
- Business Process Identification
- Finalized/Approved Business Requirements
- Solution Blueprint
- Risk Assessment

Analyze Phase Estimate & Deliverables

7

Refined Analyze Phase Estimate (\$206k - \$226K)

Analyze Phase Deliverables:

- Finalized Project Plan & Schedule
- Updated Stakeholder Engagement Plan
- Finalized Project Charter
- Finalized Business Case
- Finalized Communication Plan
- Design of To-Be Business processes
- System Requirements Specification (SRS) and approval
- Risk Assessment

Delivery Phase Estimate & Deliverables

8

Delivery Phase Estimate (\$6.5M - \$11.0M)

Delivery Phase Deliverables/Activities:

- BICM
- Tech and Detail Design
- Build
- Test
 - Unit Test
 - Assembly Test
 - System Test
 - Integration Test
 - User Acceptance Test
 - Regression Test
- Deployment
- Post-Prod Support and Verification
- Transition to Maintenance

APPENDIX

(Assumed BU Process Impacts)

Potential Impacted Processes

10



Initiative Qualification Process

Questions										Assumptions
Select all applicable Business Processes:										
<input type="checkbox"/> Cash Processing	<input type="checkbox"/> Process Returned Items	<input type="checkbox"/> Process AR Adjustments	<input type="checkbox"/> Revenue Protection	<input checked="" type="checkbox"/> Manage Collections	Impacts assumed to Collections process covers impacts to insure that existing processes for CAP follow for FCO. Additional impacts with CAP, Assistance Program, and Budget billing cover the impacts for the changes to support the actual FCO program within the billing engine including the calculation and minimum bill logic. Enrollment is impacted due to the fact that GAS CAP customers cannot shop currently. Finally, Process AR Adjustments will cover the elimination of existing PPA balances at cutover.					
<input type="checkbox"/> Collection Orders	<input checked="" type="checkbox"/> Manage Charge Offs	<input type="checkbox"/> Special Arrangements	<input type="checkbox"/> Process Transfers	<input type="checkbox"/> Manage Refunds						
<input type="checkbox"/> Deposits	<input checked="" type="checkbox"/> Assistance Programs	<input type="checkbox"/> Periodic Maintenance	<input type="checkbox"/> Maintain Re Routes	<input type="checkbox"/> Pre-billing						
<input type="checkbox"/> Metered Service Billing	<input type="checkbox"/> Non Service Billing	<input type="checkbox"/> Unmetered Service Billing	<input type="checkbox"/> Cancel/Rebill/Adjust	<input type="checkbox"/> Process Billing Exceptions						
<input type="checkbox"/> Summary Billing	<input type="checkbox"/> Rate Refunds	<input type="checkbox"/> Rate/Tax Factors	<input type="checkbox"/> Test Billing	<input type="checkbox"/> System Controls						
<input type="checkbox"/> Revenue Reports	<input type="checkbox"/> Connect Service	<input type="checkbox"/> Disconnect Service	<input type="checkbox"/> Customer Contact	<input type="checkbox"/> Process Complaints						
<input type="checkbox"/> Landlord Agreements	<input checked="" type="checkbox"/> CAP program	<input checked="" type="checkbox"/> Budget Billing	<input type="checkbox"/> Process Duplicate Bills	<input type="checkbox"/> Produce Invoice						
<input type="checkbox"/> General Data Maintenance	<input type="checkbox"/> EFT	<input type="checkbox"/> Energy Efficiency	<input type="checkbox"/> Workflow Manager	<input type="checkbox"/> Rate Comparison						
<input type="checkbox"/> Process Non Service Account	<input type="checkbox"/> Process New Premise	<input type="checkbox"/> Dispatch Orders	<input type="checkbox"/> Maintain Security	<input type="checkbox"/> Set Meter						
<input type="checkbox"/> Remove Meter	<input type="checkbox"/> Meter Exchanges	<input type="checkbox"/> Investigate Meter	<input type="checkbox"/> Process Load Management	<input type="checkbox"/> Process Trouble Call						
<input type="checkbox"/> Work Mgmt Interface	<input type="checkbox"/> Load Management	<input type="checkbox"/> Process Inspection	<input type="checkbox"/> Equipment Tracking	<input type="checkbox"/> Conjunctive Billing						
<input type="checkbox"/> Life Support	<input type="checkbox"/> DASR	<input checked="" type="checkbox"/> Enrollment	<input type="checkbox"/> RES Registration	<input type="checkbox"/> Settlement						
<input type="checkbox"/> Special Billing	<input type="checkbox"/> Retrieval									

Potential Impacted Business Departments

11

Select all applicable Business Departments:

<input checked="" type="checkbox"/> Universal Services	<input type="checkbox"/> Gas Transportation	<input type="checkbox"/> Gas Rates	<input checked="" type="checkbox"/> System Billing	<input checked="" type="checkbox"/> Revenue Accounting
<input type="checkbox"/> Revenue Management	<input checked="" type="checkbox"/> Call Center	<input type="checkbox"/> Marketing	<input type="checkbox"/> CASE (Complaints)	<input type="checkbox"/> Meter Reading
<input type="checkbox"/> ESSD	<input type="checkbox"/> Energy Acquisition	<input type="checkbox"/> Finance	<input checked="" type="checkbox"/> Regulatory (Electric Rates)	<input type="checkbox"/> Field and Meter (FMS)
<input checked="" type="checkbox"/> Communications	<input type="checkbox"/> Customer Relations	<input type="checkbox"/> Financial Planning	<input type="checkbox"/> Internal IT Audit	<input type="checkbox"/> Internal Audit
<input type="checkbox"/> Retail Rates	<input type="checkbox"/> Project and Vendor Mgmt.	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Regulatory and Govt. Affairs	<input type="checkbox"/> Regulatory Programs
<input type="checkbox"/>	<input type="checkbox"/>			
Large Customer Services	Market Research			

Several business departments are impacted but for this project the main areas identified are checked. Regulatory rates is checked to address the cutover from the existing CAP rate structure to the FCO option as well as the minimum bills. Significant training impacts are expected. Training and communication are significantly impacted to address both internal and external communication about the new program and how it will impact customers.

Potential Impacted Interfaces

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Select all applicable Interfaces:

<input type="checkbox"/> IRS	<input type="checkbox"/> OMS	<input checked="" type="checkbox"/> VRU	<input type="checkbox"/> CTI	<input type="checkbox"/> 21st Century
<input type="checkbox"/> MDT	<input type="checkbox"/> FMS Tracker	<input type="checkbox"/> AMS	<input type="checkbox"/> Passport	<input type="checkbox"/> CEGIS
<input type="checkbox"/> Equifax	<input type="checkbox"/> BASE (Risk Scoring)	<input checked="" type="checkbox"/> BRIO	<input type="checkbox"/> EFS (GL)	<input type="checkbox"/> Cash (GL)
<input type="checkbox"/> Wells Fargo	<input type="checkbox"/> Recon. Plus	<input type="checkbox"/> Municipal Tax	<input type="checkbox"/> 1099	<input type="checkbox"/> OSI (Collection Vendor)
<input type="checkbox"/> State of IL	<input type="checkbox"/> Collection Agencies	<input type="checkbox"/> Assurant Group	<input checked="" type="checkbox"/> Revenue Management	<input type="checkbox"/> Checkfree (EBPP)
<input type="checkbox"/> SB DOC Image	<input type="checkbox"/> TransAll	<input type="checkbox"/> Verizon	<input type="checkbox"/> EDI	<input checked="" type="checkbox"/> Regulus/ Transcentra
<input type="checkbox"/> System Billing Tracker	<input type="checkbox"/> Billing Metrics Reports Outlook	<input type="checkbox"/> ITRON PPS	<input type="checkbox"/> Enerwise	<input type="checkbox"/> Cedar
<input type="checkbox"/> MV90	<input type="checkbox"/> Smart Sych TMS	<input type="checkbox"/> ABB EI	<input type="checkbox"/> Lodestar (Split Load)	<input type="checkbox"/> Cvccl
<input type="checkbox"/> PP Support	<input type="checkbox"/> PowerPath Datamart	<input type="checkbox"/> AIBS	<input type="checkbox"/> Retail Office	<input type="checkbox"/> Nature's First
<input type="checkbox"/> NDW	<input type="checkbox"/> ARMS	<input type="checkbox"/> BATS	<input type="checkbox"/> Production Data Bank	<input type="checkbox"/> Meteorlogix
<input type="checkbox"/> Audition Data Room	<input type="checkbox"/> Commercial Datamart	<input type="checkbox"/> Residential DataMart	<input type="checkbox"/> LIHEAP	<input type="checkbox"/> PLC Calculator
<input type="checkbox"/> Supplier Payment Calculator	<input type="checkbox"/> PJM	<input type="checkbox"/> DIGEX	<input type="checkbox"/> Cellnet	<input checked="" type="checkbox"/> CDW
<input type="checkbox"/> CEDI	<input type="checkbox"/> IDR	<input type="checkbox"/> eCustomer	<input type="checkbox"/> CET	<input type="checkbox"/> Trillium

Interfaces that are checked are anticipated to actually require changes.

Select any of the following that are impacted:

<input checked="" type="checkbox"/> Regression Test	<input type="checkbox"/> Cancel Rebill	<input checked="" type="checkbox"/> Payment Agreements	<input checked="" type="checkbox"/> Online (Code)
---	--	--	---

Payment agreements are impacted due to the in program arrearage process.

Appendix C

Detailed Data on Shortfall and Affordability

PECO Energy CAP Redesign Scenarios

Docket No. M-2012-2290911

7-Tier Status Quo Scenarios

7 Tier Status Quo

\$12 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	\$ Over Affordable Burden Mean	Mean PECO Cost
				Winter Oct - May	Summer June	Summer Jul - Sept			
B	90%	<=25%	92%	650	650	750	85%	\$383	\$864
C	90%	26% - 50%	84%	650	650	750	52%	\$483	\$868
D	88%	51% - 75%	68%	650	650	650	36%	\$472	\$650
D1	88%	76% - 100%	61%	650	650	650	27%	\$443	\$550
E	88%	101% - 125%	37%	650	650	650	19%	\$489	\$344
E1	88%	126% - 150%	21%	650	650	650	16%	\$492	\$193
Total							35%	\$447	\$561

\$30 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit				% Unaffordable	\$ Over Affordable Burden Mean	Mean PECO Cost
				Winter Nov - Apr	Winter Oct, May	Summer June	Summer Jul-Sept			
B	90%	<=25%	86%	1500	650	650	750	83%	\$594	\$1,083
C	90%	26% - 50%	73%	1500	650	650	750	43%	\$757	\$1,030
D	88%	51% - 75%	39%	1500	650	650	650	23%	\$595	\$500
D1	88%	76% - 100%	22%	1500	650	650	650	17%	\$660	\$253
E	88%	101% - 125%	0%	1500	650	650	650	11%	\$722	\$0
E1	88%	126% - 150%	0%	1500	650	650	650	4%	\$921	\$0
Total								25%	\$652	\$384

3% change in monthly usage, with half of the months showing a 3% increase and half showing a 3% decrease

\$12 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	\$ Over Affordable Burden Mean	Mean PECO Cost
				Winter Oct - May	Summer June	Summer Jul - Sept			
B	90%	<=25%	92%	650	650	750	85%	\$383	\$864
C	90%	26% - 50%	84%	650	650	750	52%	\$482	\$868
D	88%	51% - 75%	68%	650	650	650	36%	\$471	\$650
D1	88%	76% - 100%	61%	650	650	650	27%	\$443	\$550
E	88%	101% - 125%	37%	650	650	650	19%	\$489	\$344
E1	88%	126% - 150%	21%	650	650	650	16%	\$492	\$193
Total							36%	\$446	\$561

\$30 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit				% Unaffordable	\$ Over Affordable Burden Mean	Mean PECO Cost
				Winter Nov - Apr	Winter Oct, May	Summer June	Summer Jul-Sept			
B	90%	<=25%	86%	1500	650	650	750	84%	\$595	\$1,082
C	90%	26% - 50%	73%	1500	650	650	750	43%	\$756	\$1,029
D	88%	51% - 75%	39%	1500	650	650	650	23%	\$598	\$500
D1	88%	76% - 100%	22%	1500	650	650	650	17%	\$662	\$253
E	88%	101% - 125%	0%	1500	650	650	650	11%	\$724	\$0
E1	88%	126% - 150%	0%	1500	650	650	650	4%	\$923	\$0
Total								25%	\$653	\$384

5% increase in energy costs for 30% of customers

\$12 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	\$ Over Affordable Burden Mean	Mean PECO Cost
				Winter Oct - May	Summer June	Summer Jul - Sept			
B	90%	<=25%	92%	650	650	750	85%	\$386	\$871
C	90%	26% - 50%	84%	650	650	750	53%	\$487	\$875
D	88%	51% - 75%	68%	650	650	650	36%	\$474	\$655
D1	88%	76% - 100%	61%	650	650	650	27%	\$446	\$554
E	88%	101% - 125%	37%	650	650	650	19%	\$492	\$347
E1	88%	126% - 150%	21%	650	650	650	16%	\$496	\$195
Total							36%	\$450	\$566

\$30 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit				% Unaffordable	Mean	Mean PECO Cost
				Winter Nov - Apr	Winter Oct, May	Summer June	Summer Jul-Sept			
B	90%	<=25%	86%	1500	650	650	750	84%	\$599	\$1,094
C	90%	26% - 50%	73%	1500	650	650	750	44%	\$763	\$1,039
D	88%	51% - 75%	39%	1500	650	650	650	23%	\$602	\$505
D1	88%	76% - 100%	22%	1500	650	650	650	17%	\$664	\$255
E	88%	101% - 125%	0%	1500	650	650	650	11%	\$746	\$0
E1	88%	126% - 150%	0%	1500	650	650	650	4%	\$879	\$0
Total								25%	\$658	\$388

PECO Energy CAP Redesign

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7-Tier R/S/SD Scenarios

CAP 7 Tier Redeployment / Seasonality / Standard Deviation

\$12 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	S Over Affordable Burden Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate R									
B	98%	<=25%	94%	1125	815	1300	70%	\$222	\$1,049
C	98%	26% - 50%	89%	1125	815	1300	21%	\$427	\$1,113
D	88%	51% - 75%	68%	1125	815	1300	20%	\$393	\$797
D1	80%	76% - 100%	54%	1125	815	1300	24%	\$349	\$584
E	80%	101% - 125%	27%	1125	815	1300	21%	\$442	\$304
E1	80%	126% - 150%	7%	1125	815	1300	21%	\$482	\$77
Total							27%	\$351	\$627

\$30 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	S Over Affordable Burden Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate RH									
B	98%	<=25%	92%	2500	1300	1300	71%	\$364	\$1,349
C	98%	26% - 50%	82%	2500	1300	1300	17%	\$675	\$1,418
D	88%	51% - 75%	39%	2500	1300	1300	16%	\$522	\$614
D1	80%	76% - 100%	7%	2500	1300	1300	22%	\$666	\$95
E	80%	101% - 125%	0%	2500	1300	1300	11%	\$722	\$0
E1	80%	126% - 150%	0%	2500	1300	1300	4%	\$921	\$0
Total							21%	\$544	\$432

3% change in monthly usage, with half of the months showing a 3% increase and half showing a 3% decrease

\$12 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate R									
B	98%	<=25%	94%	1125	815	1300	70%	\$222	\$1,048
C	98%	26% - 50%	89%	1125	815	1300	21%	\$427	\$1,112
D	88%	51% - 75%	68%	1125	815	1300	20%	\$393	\$797
D1	80%	76% - 100%	54%	1125	815	1300	24%	\$349	\$584
E	80%	101% - 125%	27%	1125	815	1300	21%	\$443	\$303
E1	80%	126% - 150%	7%	1125	815	1300	21%	\$482	\$77
Total							27%	\$352	\$627

\$30 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate RH									
B	98%	<=25%	92%	2500	1300	1300	71%	\$365	\$1,348
C	98%	26% - 50%	82%	2500	1300	1300	17%	\$669	\$1,417
D	88%	51% - 75%	39%	2500	1300	1300	17%	\$522	\$614
D1	80%	76% - 100%	7%	2500	1300	1300	22%	\$664	\$95
E	80%	101% - 125%	0%	2500	1300	1300	11%	\$724	\$0
E1	80%	126% - 150%	0%	2500	1300	1300	4%	\$923	\$0
Total							21%	\$543	\$431

5% increase in energy costs for 30% of customers

\$12 Minimum Monthly Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate R									
B	98%	<=25%	94%	1125	815	1300	70%	\$223	\$1,058
C	98%	26% - 50%	89%	1125	815	1300	21%	\$430	\$1,122
D	88%	51% - 75%	68%	1125	815	1300	21%	\$395	\$803
D1	80%	76% - 100%	54%	1125	815	1300	24%	\$350	\$588
E	80%	101% - 125%	27%	1125	815	1300	21%	\$447	\$306
E1	80%	126% - 150%	7%	1125	815	1300	22%	\$485	\$78
Total							27%	\$354	\$632

\$30 Monthly Minimum Payment

CAP Tiers	Affordability Goals	Poverty Level	Discount	Usage Limit			% Unaffordable	Mean	Mean PECO Cost
				Winter Dec-Mar	Shoulder Oct, Nov, Apr, May	Summer Jun-Sep			
Rate RH									
B	98%	<=25%	92%	2500	1300	1300	71%	\$367	\$1,363
C	98%	26% - 50%	82%	2500	1300	1300	17%	\$680	\$1,432
D	88%	51% - 75%	39%	2500	1300	1300	17%	\$527	\$620
D1	80%	76% - 100%	7%	2500	1300	1300	23%	\$669	\$96
E	80%	101% - 125%	0%	2500	1300	1300	11%	\$746	\$0
E1	80%	126% - 150%	0%	2500	1300	1300	4%	\$879	\$0
Total							22%	\$549	\$436

PECO Energy CAP Redesign

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FCO Scenarios

FCO

\$12 Minimum Monthly Payment

CAP Tiers	Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	5%	99%	0%	\$215	\$966
C		26% - 50%	5%	88%	1%	\$116	\$944
D		51% - 75%	6%	43%	9%	\$75	\$625
D1		76% - 100%	6%	27%	22%	\$64	\$445
E		101% - 125%	7%	5%	57%	\$76	\$215
E1		126% - 150%	7%	3%	74%	\$80	\$127
Total	Total			39%	27%	\$124	\$518

\$30 Minimum Monthly Payment

CAP Tiers	Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	13%	98%	1%	\$384	\$1,175
C		26% - 50%	13%	75%	7%	\$184	\$1,032
D		51% - 75%	16%	21%	50%	\$107	\$338
D1		76% - 100%	16%	9%	74%	\$125	\$173
E		101% - 125%	17%	2%	89%	\$96	\$75
E1		126% - 150%	17%	1%	96%	\$193	\$35
Total	Total			26%	61%	\$253	\$363

3% change in monthly usage, with half of the months showing a 3% increase and half showing a 3% decrease

\$12 Minimum Monthly Payment

CAP Tiers	Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	5%	100%	0%	\$216	\$965
C		26% - 50%	5%	94%	1%	\$111	\$944
D		51% - 75%	6%	69%	9%	\$48	\$625
D1		76% - 100%	6%	54%	22%	\$33	\$445
E		101% - 125%	7%	26%	57%	\$18	\$215
E1		126% - 150%	7%	15%	74%	\$16	\$127
Total	Total			57%	27%	\$85	\$518

\$30 Minimum Monthly Payment

CAP Tiers	Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	13%	99%	2%	\$383	\$1,174
C		26% - 50%	13%	85%	7%	\$166	\$1,031
D		51% - 75%	16%	39%	50%	\$60	\$338
D1		76% - 100%	16%	20%	74%	\$63	\$173
E		101% - 125%	17%	7%	89%	\$36	\$75
E1		126% - 150%	17%	3%	96%	\$51	\$35
Total	Total			34%	61%	\$194	\$363

5% increase in energy costs for 30% of customers

\$12 Minimum Monthly Payment

CAP Tiers	Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	5%	99%	0%	\$220	\$971
C		26% - 50%	5%	91%	1%	\$121	\$947
D		51% - 75%	6%	57%	9%	\$71	\$626
D1		76% - 100%	6%	43%	22%	\$57	\$446
E		101% - 125%	7%	17%	57%	\$55	\$215
E1		126% - 150%	7%	10%	74%	\$57	\$127
Total	Total			49%	27%	\$111	\$519

\$30 Minimum Monthly Payment

CAP Tiers	Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO Cost
B		< 25%	13%	99%	2%	\$393	\$1,180
C		26% - 50%	13%	81%	7%	\$188	\$1,035
D		51% - 75%	16%	31%	50%	\$104	\$338
D1		76% - 100%	16%	15%	74%	\$116	\$173
E		101% - 125%	17%	5%	89%	\$101	\$75
E1		126% - 150%	17%	2%	96%	\$148	\$35
Total	Total			30%	61%	\$237	\$364

PECO Energy CAP Redesign

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PIP Scenarios

PIP

\$12 Minimum Monthly Payment

CAP Tiers Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	PECO Cost
B	<=25%	5%	57%	0%	\$77	\$1,136
C	26% - 50%	5%	<1%	1%	\$5	\$1,047
D	51% - 75%	6%	0%	9%	\$0	\$657
D1	76% - 100%	6%	0%	22%	\$0	\$463
E	101% - 125%	7%	0%	57%	\$0	\$219
E1	126% - 150%	7%	0%	74%	\$0	\$129
Total	Total		6%	27%	\$77	\$561

\$30 Minimum Monthly Payment

CAP Tiers Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO
B	<=25%	13%	63%	1%	\$206	\$1,423
C	26% - 50%	13%	0%	7%	\$0	\$1,170
D	51% - 75%	16%	0%	50%	\$0	\$360
D1	76% - 100%	16%	0%	74%	\$0	\$185
E	101% - 125%	17%	0%	89%	\$0	\$77
E1	126% - 150%	17%	0%	96%	\$0	\$36
Total	Total		7%	61%	\$206	\$413

3% change in monthly usage, with half of the months showing a 3% increase and half showing a 3% decrease

\$12 Minimum Monthly Payment

CAP Tiers Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO
B	<=25%	5%	57%	0%	\$77	\$1,137
C	26% - 50%	5%	<1%	1%	\$5	\$1,048
D	51% - 75%	6%	0%	9%	\$0	\$658
D1	76% - 100%	6%	0%	21%	\$0	\$463
E	101% - 125%	7%	0%	57%	\$0	\$220
E1	126% - 150%	7%	0%	74%	\$0	\$129
Total	Total		6%	27%	\$77	\$561

\$30 Minimum Monthly Payment

CAP Tiers Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO
B	<=25%	13%	63%	1%	\$206	\$1,424
C	26% - 50%	13%	0%	7%	\$0	\$1,171
D	51% - 75%	16%	0%	50%	\$0	\$361
D1	76% - 100%	16%	0%	74%	\$0	\$185
E	101% - 125%	17%	0%	89%	\$0	\$78
E1	126% - 150%	17%	0%	96%	\$0	\$36
Total	Total		7%	61%	\$206	\$413

5% increase in energy costs for 30% of customers

\$12 Minimum Monthly Payment

CAP Tiers Rate R	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO
B	<=25%	5%	57%	0%	\$77	\$1,146
C	26% - 50%	5%	<1%	1%	\$5	\$1,058
D	51% - 75%	6%	0%	9%	\$0	\$667
D1	76% - 100%	6%	0%	21%	\$0	\$471
E	101% - 125%	7%	0%	57%	\$0	\$225
E1	126% - 150%	7%	0%	74%	\$0	\$133
Total	Total		6%	27%	\$77	\$569

\$30 Minimum Monthly Payment

CAP Tiers Rate RH	Poverty Level	Percent of Income Payment	% Unaffordable	% Who Do Not Receive Subsidy	\$ Over Affordable Burden Mean	Mean PECO
B	<=25%	13%	63%	1%	\$206	\$1,438
C	26% - 50%	13%	0%	7%	\$0	\$1,187
D	51% - 75%	16%	0%	49%	\$0	\$371
D1	76% - 100%	16%	0%	74%	\$0	\$191
E	101% - 125%	17%	0%	89%	\$0	\$81
E1	126% - 150%	17%	0%	96%	\$0	\$38
Total	Total		7%	61%	\$206	\$420

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval of its Default Service Program	:	P-2012-2283641
PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015	:	M-2012-2290911

Certificate of Service

I, Ward Smith, hereby certify that I have this day served a copy of PECO Energy's Report on Alternative Models for the Delivery of Customer Assistance Program Benefits the above matter upon all interested parties by email, in both PDF and Word-compatible format, to the individuals listed in the attached Service List.

Dated at Philadelphia, Pennsylvania, September 30, 2013.



Ward L. Smith
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**P-2012-2283641 – PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS
DEFAULT SERVICE PROGRAM & M-2012-2290911. Created 1/7/2013 (Revised)**

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