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July 24, 2018

Honorable Christopher P. Pell
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107

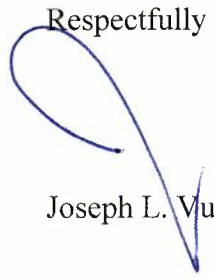
Honorable F. Joseph Brady
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107

RE: PA PUC v. PECO Energy Company
Docket No. R-2018-3000164

Dear Judge Pell & Judge Brady:

Enclosed please find a copy of Community Action Association of Pennsylvania's Statement No. 1-R, Rebuttal Testimony of Susan A. Moore. As indicated below, I am serving all parties of record with a hard copy of the enclosed. I served all parties via first class mail and electronically on today's date. If you need anything further, please do not hesitate to contact me.

Respectfully submitted,



Joseph L. Vullo

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encl.

cc: All Parties of Record

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA

CAAP Statement No. 1-R

Rebuttal Testimony of Susan A. Moore

In Re: Pennsylvania Public Utility Commission v.
PECO Energy Company

Docket Number: R-2018-3000164

1 **Q. Please state your name, title, and business address.**

2 **A.** My name is Susan A. Moore, Chief Executive Officer, Community Action
3 Association of Pennsylvania, 222 Pine Street, Harrisburg, PA 17101.

4
5 **Q. On whose behalf are you testifying?**

6 **A.** The Community Action Association of Pennsylvania (CAAP), a statewide
7 association of local Community Action Agencies in Pennsylvania.

8
9 **Q. What is your relevant experience in this case before the Commission?**

10 **A.** CAAP was incorporated in 1975, more than 43 years ago and, as an integral part
11 of its mission, has advocated for the low-income population of Pennsylvania. I have been
12 the CEO of this agency for nine years. Prior to that, I worked as the CEO for The Florida
13 Patient Safety Corporation, an organization dedicated to the continuous improvement of
14 patient safety in Florida by serving as a learning and research organization, created and
15 funded by the Florida Legislature in recognition of the need to improve patient safety and
16 address skyrocketing liability insurance premiums in Florida. I also served on the Board
17 of Directors for the Pennsylvania Hunger Action Center, an organization advocating
18 against hunger insufficiency on a statewide basis. On behalf of our member agencies,
19 CAAP has intervened in numerous rate and restructuring cases before the PUC including
20 Peoples' Natural Gas rate case (R-2012-2285985) as well as the pending rate cases of
21 Duquesne Light Company (R-2018-3000124) and Columbia Gas (R-2018-2647577).
22 CAAP also intervened in Columbia Gas' 2016 rate case. (R-2016-2529660).

1 **Q. What is the interest of CAAP in this proceeding?**

2 **A.** The interest of CAAP in this proceeding is basically the same as it has been in
3 those prior proceedings I mentioned above. Our general concern is the impact of the
4 Company's proposals on low-income customers. We are concerned about the impact of
5 the Company's proposed rate design on residential customers, particularly low-income
6 customers and we are concerned with the proposed rate design's impact on the ability and
7 motive of low-income customers to conserve energy. We are also in this case to address
8 the availability, design and funding of the Company's low-income, or universal service
9 programs. We want to insure that the legislature's directive in the Electric Choice and
10 Competition Act that universal service programs are 'appropriately funded and available'
11 is followed.

12

13 **Q. Apart from universal service, does CAAP take a position on whether the**
14 **Company's rate increase should be granted?**

15 **A.** No, we do not take a position on whether a rate increase should be granted.
16 However, we do address some rate design issues and their impact on conservation and
17 low-income customers.

18

19 **Q. Have you submitted direct testimony in this proceeding?**

20 **A.** No.

21

22

23

1 **Q. What is the purpose of your rebuttal testimony?**

2 **A.** I am submitting rebuttal testimony to support some of the recommendations make
3 by CAUSE-PA witness Mitchell Miller in CAUSE-PA Statement No. 1.

4

5 **Q. What recommendations made by Mr. Miller would you like to address?**

6 **A.** Initially, I support the CAUSE-PA recommendation that the Company's request
7 to increase its fixed monthly residential charge by 48% be denied. I support that
8 recommendation because the more a consumer's bill is comprised of fixed charges, the
9 less motive, and opportunity, the consumer has to reduce consumption and therefore save
10 money. One of the only defenses a family, particularly a poor family, has against
11 increases in energy costs is to conserve – lower the thermostat, seal air leaks, change
12 filters regularly, add more insulation, get a more efficient heating unit, etc. The
13 Company's proposal to increase that fixed cost would negatively impact a customer's
14 motive to conserve and the ability to save money. For that same reason I support the
15 recommendation that any rate increase for the residential class be applied to the
16 volumetric charge.

17

18 **Q. Are there other recommendations made by CAUSE-PA that you would like**
19 **to address?**

20 **A.** Yes. Like CAUSE-PA witness Miller I am concerned about the number of low-
21 income customers in this Company's territory, the number who are eligible for LIURP
22 services and the fact that the number of LIURP jobs completed each year have declined
23 each year beginning in 2015. It is for these reasons that I support CAUSE-PA's

1 recommendations that LIURP funding be increased by \$2,100,700 annually and that the
2 usage threshold for non-CAP customers be reduced from 600 kWh to 500 kWh.

3

4 **Q. Does this conclude your testimony?**

5 **A. Yes.**

David P. Zambito, Esquire
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Respectfully submitted,



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