



March 30, 2017

VIA E-FILING

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

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627

Dear Secretary Chiavetta,

On March 10, 2017, PPL Electric Utilities (PPL) filed a Petition for Approval to Amend the Implementation Date of the Customer Assistance Program Standard Offer Program (CAP-SOP) that was to launch on June 1, 2017. In its petition, PPL indicates that because of various system design issues, it is unable to test and implement the system changes by the June 1st date, and has requested the implementation date to be moved to September 1, 2017. Petition at ¶ 21.

CAUSE-PA does not oppose this request, but urges PPL to ensure that implementation not be delayed longer than September 1, 2017. As the Commission noted in its January 26, 2017 Order on Reconsideration, “the overwhelming substantial evidence presented in this proceeding demonstrated that there has been significant harm to both CAP shopping customers and non-CAP residential customers who pay the costs of the program” from unrestricted CAP shopping, and that “CAP-SOP proposal was the best of several alternatives provided on the record of this proceeding to address the unreasonable ramifications of unrestricted shopping by PPL’s CAP customers.” *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 Through May 31, 2017*, Docket No. P-2016-2526627 at 18 (Opinion and Order, January 26, 2017). Thus, while CAUSE-PA does not object to a temporary delay to CAP-SOP implementation so that the appropriate IT infrastructure is in place and adequate to ensure success, further delay beyond that would only compound the “significant harm” and “unreasonably ramifications” associated with unrestricted CAP shopping.

Respectfully,

A handwritten signature in blue ink, appearing to read "Patrick M. Cicero".

Patrick M. Cicero
Counsel for CAUSE-PA

CC: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2016-2526627
and Procurement Plan for the Period of June :
1, 2017 through May 31, 2021 :

CERTIFICATE OF SERVICE

I hereby certify that on this day, March 30, 2017, I have served copies of forgoing letter via email and first-class mail upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Respectfully Submitted,



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Dated: March 30, 2017