

Buchanan

Ingersoll · Rooney

Tanya C. Leshko
717 237 4868
tanya.leshko@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852

September 2, 2020

VIA E-FILING

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

Re: Universal Service and Energy Conservation Plan (USECP) Filing Schedule and
Independent Evaluation Filing Schedule;
Docket No. M-2019-3012601

Dear Secretary Chiavetta:

In accordance with the Order entered on October 3, 2019 in the above-referenced matter, and on behalf of National Fuel Gas Company ("NFG"), I enclose for electronic filing NFG's Universal Service Programs 2020 Evaluation, Final Evaluation Report.

Copies are being served on the Parties of Record as noted in the docket and as indicated in the attached Certificate of Service, which will be updated as appropriate.

Please contact the undersigned with any questions.

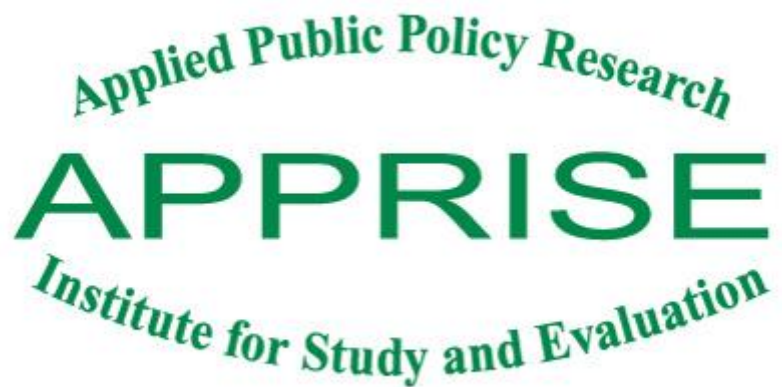
Respectfully submitted,



Tanya C. Leshko

TCL/tlg
Enclosure

cc: Certificate of Service
Eric Tuttle, BCS (via email etuttle@pa.gov)
Joseph Magee, BCS (via email jmagee@pa.gov)
Louise Fink Smith, Law Bureau (via email finksmith@pa.gov)



**National Fuel Gas
Universal Service Programs 2020
Evaluation**

Final Evaluation Report

August 2020

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Executive Summary

National Fuel Gas (NFG) offers Universal Service Programs to help customers maintain affordable natural gas service. The programs include the Low-Income Residential Assistance Program (LIRA) that provides discounted rates and arrearage forgiveness to payment-troubled, low-income customers; the Low-Income Usage Reduction Program (LIURP) and the Emergency Repair and Replacement Program (ERRP) to help low-income customers reduce their energy usage and bills; The Neighbor for Neighbor Heat Fund to assist customers who are behind on their NFG or other fuel bills; and the Customer Assistance and Referral Evaluation Services Program (CARES) to assist low-income, fixed income, special needs, and payment-troubled customers who are experiencing short-term financial hardship. This report presents the findings from the 2020 evaluation of NFG's Universal Service Programs.

Universal Service Programs

National Fuel Gas (NFG) offers Universal Service Programs to help customers maintain affordable natural gas service.

Low-Income Residential Assistance Program

NFG's Low-Income Residential Assistance Program (LIRA) provides discounted rates to payment-troubled, low-income customers. LIRA aims to increase the number of customer payments and reduce NFG's collections costs. They expect customers to better manage their gas costs through lower rates, intensive NFG monitoring, conservation education, and linkages to all available income support programs.

LIRA had 8,575 customers enrolled as of October 2016. NFG implemented initiatives to achieve a minimum LIRA participation rate of 9,000. However, participation was under 8,000 in 2018. NFG has identified opportunities to increase LIRA enrollment. Most recently, in 2020, they invited eligible customers to enroll in LIRA. They also had a postcard mailing that asked customers to contact NFG if they qualified for the program. However, NFG reports that new enrollments have remained modest due to low natural gas prices, and participation remains between 8,000 and 8,500.

Customers have needed additional assistance due to COVID-19, but it was still challenging for NFG to engage customers due to the moratorium. NFG continues to pursue opportunities to identify, engage, and enroll program participants. They expect the number of future LIRA enrollments to increase as a direct result of the COVID-19 Pandemic.

LIRA discounts were developed to meet affordability targets, based on household income and the number of household members. Discounts range from ten percent to 80 percent, and there is a minimum monthly payment of \$12. All participants are placed on a budget plan.

Arrearage forgiveness is provided for balances built up prior to LIRA enrollment. Customers must make monthly payments that are equal to or greater than the billed amount

or bring the account current to receive arrearage forgiveness. Each month the bill is paid on time, 1/24 of the amount eligible for forgiveness is eliminated.

Dival Safety Incorporated is NFG's third-party contractor that processes LIRA applications, provides customer education, maintains the LIRA customer database, and provides reports to NFG on their activities. Matrix Imaging is NFG's third party vendor responsible for printing and mailing invitations and reverification packets.

Low-Income Usage Reduction Program and Emergency Repair and Replacement Program

The Low-Income Usage Reduction program (LIURP) helps low-income customers to reduce their energy usage and energy bills by installing energy measures. The Emergency Repair and Replacement Program (ERRP) provides water heater repair and replacement, and furnace and boiler repair and replacement.

NFG bids the LIURP work out to community agencies and private contractors to obtain the lowest prices. The program achieved high energy savings, averaging over 20 percent of pre-treatment energy usage in 2017.

Neighbor for Neighbor Heat Fund

The Neighbor for Neighbor Heat Fund provides assistance to prevent disconnection of utility services, to pay overdue bills, to purchase heating fuel, and to repair or replace heating equipment. In FY 2019, 243 customers received assistance from the Neighbor for Neighbor, with an average benefit of \$284.

Customer Assistance and Referral Evaluation Services Program

The Customer Assistance and Referral Evaluation Services (CARES) Program assists low-income, fixed income, special needs, and payment-troubled customers who are experiencing short-term financial hardship.

The CARES representative conducts an in-depth analysis of the customer's payment situation, including documenting income and expenses. If the customer can pay the Budget plus an amount toward the arrears, a Budget plus arrangement is negotiated. If the customer is unable to pay that arrangement, the customer can receive a CARES flat payment arrangement which can be less than the budget plan and cannot exceed four months.

The CARES representative assesses the causes of the customer's bill payment problems and develops a referral and action plan to obtain assistance for the customer. This assistance may include financial assistance, medical and mental health services, food, clothing, shelter, or other assistance.

As part of CARES, NFG conducts annual LIHEAP outreach campaigns with educational letters, mailings, news media releases, and advertising.

Program Data Analysis

This section provides program and participation statistics for LIRA, LIURP, the Neighbor for Neighbor Heat Fund, and CARES.

Key findings on the 2019 LIRA participants were as follows.

- There were 9,856 customers who participated in LIRA at some point in 2019.
- 31 percent of these customers first enrolled in LIRA before 2015.
- The mean participation length was 4.6 years.
- While 63 percent of 2019 participants received a ten percent discount, seven percent received a discount greater than 50 percent, and four percent received an 80 percent discount
- The mean percentage discount was 21 percent.
- The average annual discount was \$219.
- The mean pre-program arrears amount was \$596.

There were 125 LIURP jobs and 115 ERRP jobs in 2019.

- The mean 2019 LIURP job cost was \$5,287.
- The mean 2019 ERRP job cost was \$2,569.
- 94 percent of the 2019 LIURP jobs received insulation, 66 percent received air sealing, and 27 percent received heating system replacements. These are high measure penetration rates that led to the high program savings rates.

There were 243 Neighbor for Neighbor grants awarded for NFG overdue bills in FY 2019.

- The mean pledge amount was \$284.
- 41 additional Neighbor for Neighbor grants were awarded to other vendors in FY 2019 and the mean pledge amount was \$174.

Forty-six customers participated in CARES in 2019.

- These customers owed an average of \$691 on their NFG bill.
- 17 percent of CARES participants received LIHEAP in 2019, and the mean grant amount was \$389.

LIRA Participant Interviews

This section provides a summary of the findings from in-depth telephone interviews with 31 current and recent LIRA participants.

- **Participation Status:** All participants confirmed their knowledge of participation in LIRA. One participant did not know if she was currently participating in the program but reported that she participated in the program within the past year.
- **Awareness of LIRA Program:** Most participants found out about the LIRA Program through a local agency or through an NFG representative.
- **Enrollment Reasons:** Most participants reported that they decided to enroll to lower their gas bill or because of their low or fixed income or finances.

- **Difficulty of Applying for LIRA:** Twenty-nine of the 31 participants reported that it was not too difficult or not at all difficult to apply.
- **LIRA Reverification:** Twenty of the 31 participants said they had reverified for the program and 19 of those 20 said it was not too difficult or not at all difficult to reverify.
- **Phone Call from NFG at Program Enrollment:** Twelve of the 31 interviewed participants said they received a phone call or voicemail from NFG at the time of program enrollment. All participants who received a phone call from NFG at enrollment said the call or voicemail was either very helpful or somewhat helpful.
- **LIRA Benefits:** Of the 31 program participants, 28 reported that they had a good understanding of the benefits provide by NFG. When asked about the benefits offered by LIRA, they were most likely to report lower energy or gas bills.
- **Difficulty Paying NFG Bills Before and After Enrolling in LIRA:** Twenty-seven of the 31 participants found it very difficult or somewhat difficult to pay their NFG bill before participating in LIRA, and only two participants found it very or somewhat difficult to pay their NFG bills while participating in LIRA.
- **Importance of LIRA in Making Ends Meet:** Twenty-five of the 31 participants reported that LIRA had been very important in helping them to make ends meet, and five participants reported that it had been somewhat important in helping them to make ends meet.
- **Energy Education:** Twelve of the 31 participants reported that they received energy education or services through LIRA. Six said they received energy education materials, two said they received a LIRA Audit, and four said they received a LIURP energy audit or weatherization work.¹
- **LIHEAP Participation:** Twenty-seven of the 31 participants reported that they received LIHEAP benefits. Ten of these participants reported that they received LIHEAP benefits after participating in LIRA.
- **Overall Satisfaction with LIRA:** Overall, participants were satisfied with LIRA. Twenty-nine participants reported that they were very satisfied with LIRA, and two participants reported that they were somewhat satisfied. No respondents reported that they were dissatisfied.
- **Participant Recommendations:** Participants offered the following ideas for program improvement: conduct more outreach, allow applicants to submit photos of documents,

¹Dival reported education contact rates to NFG of 73 percent for 2018, 69 percent for 2019, and 68 percent for the first quarter of 2020. Success was defined as a call completed with a customer or a scripted voice message left for the customer.

and provide a reminder when people need to reverify via phone and via the NFG gas bill.²

LIRA Impact Analysis

This section provides a summary of the key findings from the LIRA impact analysis.

- **Participation Continuity:** 69 percent of the 2019 participants and 71 percent of the new enrollees participated in LIRA for a full year.
- **LIRA Discount:** The full year 2019 participants received a mean LIRA discount of \$152, which was a 17 percent discount on their bill.
- **Minimum Bill:** 14 percent of the 2019 participants below 50 percent of the poverty level received the minimum bill and three percent of all 2019 participants received the minimum bill.
- **Affordability Impacts:** The new enrollees received an average discount of \$191 and reduced their mean energy burden from 16 percent to 14 percent in the year following enrollment.
- **PUC Energy Burden Target:** 23 percent of the 2019 participants with income below 50 percent of the poverty level had an energy burden above the PUC target.
- **Payment Impacts:** LIRA had a positive impact on participants' payment impacts following enrollment.
 - LIRA participants increased their total number of cash payments from 5.9 payments in the year preceding LIRA enrollment to 7.2 payments in the post-period.
 - LIRA participants increased their total credits by \$179 in the year following program enrollment, as compared to the comparison groups.
 - The total coverage rate (percent of the bill covered by cash and assistance payments) increased for LIRA participants from 93 percent in the year prior to enrollment to 114 percent in the year following enrollment.
 - LIRA participants' balance declined by \$201 as compared to the comparison groups.
- **LIHEAP Receipt:** 55 percent of Treatment Group customers received LIHEAP in the year prior to LIRA enrollment, compared to 58 percent in the year following enrollment. This is a positive finding, as research on other CAP programs found that CAP participants were less likely to receive LIHEAP following CAP enrollment.

²NFG reported that they have already begun calling customers one week to ten days prior to mailing the reverification information.

- Arrearage Forgiveness: 90 percent of the 2019 participants with arrears received arrearage forgiveness averaging \$157.
- Collections Impact: New LIRA enrollees experienced a significant reduction in the number of collection calls, field visits, and notices in the year following enrollment. However, the decrease in collection calls was offset by a significant increase in the number of LIRA calls. As a result, the total number of collections actions was unchanged.

Findings and Recommendations

This section provides a summary of findings and recommendations from the NFG Universal Service Program Evaluation.

LIRA Recommendations

The evaluation found that the LIRA Program provides significant benefits to participants, which results in improved affordability, improved bill payment, and reduced arrearages. Participants were highly satisfied with the program and reported that LIRA was very important in helping them to meeting their needs. We provide the following recommendations to improve the program.

1. Reassess Discounts for LIRA Participants with Income Below 50 Percent of the Poverty Level

Twenty-three percent of full year 2019 LIRA participants with income at or below 50 percent of the poverty level (excluding \$0 income customers) had an energy burden above the PUC target of eight percent. Reassess the discount calculation for these customers to provide greater affordability for the lowest poverty level group.³

2. Improve LIRA Application Instructions

Dival reported that 35 to 50 percent of applications do not include complete financial documentation. They may include less than the month of income documentation required or exclude information on child support or public assistance. According to Dival, the financial documentation requirements are not listed clearly on the application. They stated that the requirements for the financial documentation are listed “in small writing” at the bottom of the frontside of the application.⁴

3. Provide a LIRA Electronic Application Submission Option

Dival reported that customers frequently call to request an extension on their ten-day deadline to submit their LIRA application or follow-up information. Many customers expressed interest in submitting their applications via email and were wary of mailing their application because of a concern that it may be lost in transit or not reach Dival before the submission deadline.

³NFG reported that they will be modifying the LIRA Program rate to meet the PUC affordability targets.

⁴NFG reported that they will review the LIRA packet, including the application and program features sheet with the Advisory Committee. Recommendations for program improvements will be identified and investigated for program modification.

Electronic submission would allow customers to submit applications and follow-up information instantaneously, which would give them more time to fill out the application and gather the required information.

If NFG offered an online application, Dival suggested that the application could include programmed checks that prevent customers from skipping parts of the application. Dival reported that on the paper application, customers may forget to sign the application, fail to provide social security numbers, or forget to fill out the back side of the application.⁵

4. *Provide Dival the Ability to Directly Transfer Customers to NFG Customer Service*

Dival is only permitted to answer customer questions that are related to the LIRA program. They estimated that 30 percent of their calls are non-LIRA related. They provide these customers with NFG's 1-800 number, but they reported that customers are angry that they are unable to be transferred to NFG directly.⁶

5. *Prevent the Reverification Date from Scheduling on a Weekend or Holiday*

When processing zero-income applications and reverifications, Dival staff are required to manually determine and enter the next reverification date into the system. The system will not generate reverification packets for customers if their reverification date is a weekend or a holiday, but it does not notify Dival if the date they have selected is a weekend or holiday. It would be helpful if the system automatically calculated a future reverification date for zero-income customers and/or checked if the entered reverification date was a weekend or holiday.⁷

6. *Educate Customers about LIHEAP Benefits*

Dival reported that many customers have trouble differentiating between the various assistance programs they receive. The education call script used by Dival only briefly mentions LIHEAP. During the education call, customers are currently only told that they should apply for the program when it is open and to contact their local assistance office if they want more information.⁸

⁵NFG reported that they will consider all suggestions and investigate opportunities for improvement. Customer confidentiality concerns will be evaluated as part of the review process. They will issue Requests for Proposals for LIRA and Neighbor for Neighbor administration in 2021 and consider contractor technological capabilities as an important part of the selection process. NFG is currently upgrading the functionality of their website for opportunities as well.

⁶NFG reported that they have met with Dival and resolved this issue.

⁷NFG reported that they have provided Dival with information on all observed holidays.

⁸NFG reported that they will review and modify their scripts to better distinguish the LIRA, LIHEAP, and LIURP programs. NFG provides LIRA education calls, seasonal LIHEAP calls, and an annual LIHEAP letter campaign. They will consider making an additional call during LIHEAP season to help distinguish between LIRA and LIHEAP.

LIURP Recommendations

LIURP provides important services, successfully targets high gas users, and achieves high energy savings for program participants. We have the following recommendations to improve the program.

1. *Provide Increased Training, Communication, and Guidance to Service Delivery Organizations*

A LIURP organization reported that the overall communication and guidance from NFG about the program is lacking. The representative reported that NFG has never offered training opportunities or subsidized the cost of new equipment and does not provide many opportunities for agencies to provide feedback.⁹

2. *Improve LIURP Outreach*

LIURP organizations reported that they serve a small percentage of referred customers because the customers are not interested or aware of LIURP when called. NFG has begun calling customers to increase understanding of the program. NFG should assess whether the calls result in improved participation rates.¹⁰

3. *NFG Identification*

A LIURP organizations reported that it would be useful to have NFG shirts to provide greater customer acceptance when they visit the home.¹¹

4. *Provide Customer Email Addresses to Service Delivery Organizations*

A LIURP organization reported that it would be helpful to have an additional method to contact customers.¹²

5. *Require Blower Door Testing to Determine Air Sealing Opportunities*

One LIURP organization reported that this was not required and would help to assess opportunities for air sealing.¹³

⁹NFG reported that Pennsylvania provides comprehensive trainings for vendors. NFG was a Bronzer Sponsor for the 2019 LIURP conference and provided four scholarships. NFG plans to continue to assist in planning and sponsoring this event every three years. They will also resume a mandatory annual meeting for their LIURP contractors.

¹⁰NFG reported that they will continue to reach out to identify LIURP candidates to explain the program and its benefits in an effort to improve participation rates. They are working to implement a statewide LIURP advertising campaign with the other utilities in 2021 to increase program awareness and minimize fraud.

¹¹NFG reported that the letter from NFG and the letter from the contractor provides sufficient clarity to the customer.

¹²NFG reported that they will explore methods to increase the ease of program contact, access, and participation. They will identify options with the Advisory Committee's assistance and consider any potential confidentiality issues.

¹³NFG reported that they will continue to work with contractors to provide significant savings without mandating specific measures.

Neighbor for Neighbor Recommendations

The Neighbor for Neighbor Heat Fund provides important assistance to customers who are behind in their NFG bills and on other fuel bills. Recommendations to improve the program are provided below.

1. *Provide LIRA Training to Neighbor for Neighbor Agencies*

One agency reported that they are not very familiar with LIRA, so they only refer customers to this program once in a while. They requested additional information about LIRA so that they can more confidently provide their customers with referrals to LIRA.¹⁴

2. *Create an Online System for Submission and Tracking*

One agency reported that applications are sent via U.S. mail which results in increased application processing time and some applications getting lost or missed. The delay also makes it difficult to provide current information to applicants who call about their grants. An online system would improve processing time and information.¹⁵

CARES Recommendations

There were no CARES recommendations.

¹⁴NFG reported that they have and will continue to provide an in-service and Universal Service Program reference materials at the annual Neighbor for Neighbor meeting for all member agencies.

¹⁵NFG reported that they will explore options available to assist in application ease and efficient system processing with ratepayer cost considerations. They will issue Requests for Proposals in 2021 with specific consideration of technology solutions, and efficient and effective customer service.

I. Introduction

National Fuel Gas (NFG) offers Universal Service Programs to help customers maintain affordable natural gas service. The programs include the Low-Income Residential Assistance Program (LIRA) that provides discounted rates and arrearage forgiveness to payment-troubled, low-income customers; the Low-Income Usage Reduction Program (LIURP) and the Emergency Repair and Replacement Program (ERRP) to help low-income customers reduce their energy usage and bills; The Neighbor for Neighbor Heat Fund to assist customers who are behind on their NFG or other fuel bills; and the Customer Assistance and Referral Evaluation Services Program (CARES) to assist low-income, fixed income, special needs, and payment-troubled customers who are experiencing short-term financial hardship. This report presents the findings from the 2020 evaluation of NFG's Universal Service Programs.

A. Evaluation

The following evaluation activities were undertaken.

- 1) **Background Research:** We reviewed documents related to NFG's Universal Service Programs (USPs) including reports to the Public Utility Commission (PUC), PUC orders relating to NFG's USPs, NFG USP materials, customer communications and bills, agency contracts and training on program administration, and USP budgets and expenditures.
- 2) **NFG Manager and Staff Interviews:** We conducted in-depth telephone interviews with the managers and staff who run NFG's USPs.
- 3) **Agency and Contractor Interviews:** We conducted in-depth telephone interviews with staff at three agencies that administer the Neighbor for Neighbor Fund; three organizations that implement LIURP; with Dival Safety who processes LIRA applications, and with Matric Imaging who is responsible for LIRA invitations and reverification mailings.
- 4) **LIRA Participant Interviews:** We conducted in-depth telephone interviews with current LIRA participants.
- 5) **Universal Service Program Data Analysis:** We analyzed LIRA, LIURP, CARES, and Neighbor for Neighbor Heat Fund program data and developed statistics on program participation and services delivered.
- 6) **LIRA Impact Analysis:** We analyzed the impact of LIRA participation on affordability, payment compliance, LIHEAP receipt, arrearages, collections actions, and collections costs.

B. Organization of the Report

Five sections follow this introduction.

- 1) *Section II – Universal Service Programs Summary*: Provides a detailed description of NFG’s Universal Service Programs.
- 2) *Section III – Program Data Analysis*: Provides program and participation statistics for LIRA, LIURP, the Neighbor for Neighbor Heat Fund, and CARES.
- 3) *Section IV – LIRA Participant Interviews*: Provides a summary of the findings from the telephone interviews with LIRA participants.
- 4) *Section V – LIRA Impact Analysis*: Provides a description of the methodology and findings from the analysis of LIRA impacts.
- 5) *Section VI – Summary of Findings and Recommendations*: Provides a summary of the findings and recommendations from all of the evaluation activities.

APPRISE prepared this report under contract to NFG. NFG facilitated this research by furnishing data to APPRISE. Any errors or omissions in this report are the responsibility of APPRISE. Further, the statements, findings, conclusions, and recommendations are solely those of analysts from APPRISE and do not necessarily reflect the views of NFG.

II. Universal Service Programs Summary

National Fuel Gas (NFG) offers the following Universal Service Programs to help customers maintain affordable natural gas service.

- **Low-Income Residential Assistance Program (LIRA):** Provides discounted rates and arrearage forgiveness to payment-troubled low-income customers.
- **Low-Income Usage Reduction Program (LIURP):** Helps low-income customers reduce their energy usage and bills.
- **Neighbor for Neighbor Heat Fund:** Assists customers who are behind on their NFG bills or bills for other fuels.
- **Customer Assistance and Referral Evaluation Services Program (CARES):** Assists low-income, fixed income, special needs, and payment-troubled customers who are experiencing short-term financial hardship.

As directed by Commission order, NFG established a Universal Service Advisory Committee that meets a minimum of two times per year (beginning in 2018) to address concerns identified by the Commission. These included the LIRA bill design, explanation of arrearage forgiveness 36-month time limit, and enhanced LIRA outreach. NFG was also directed to invite DCED WAP agencies and contractors to attend and participate to specifically address the coordination of WAP and LIURP.¹⁶

A. **Low-Income Residential Assistance Program (LIRA)**

NFG's Low-Income Residential Assistance Program (LIRA) provides discounted rates to payment-troubled, low-income customers. NFG introduced LIRA as a pilot program in 1991. NFG was approved to continue, expand, and modify LIRA several times since the implementation of the pilot.

LIRA aims to increase the number of customer payments and reduce NFG's collections costs. They expect customers to better manage their gas costs through lower rates, intensive NFG monitoring, conservation education, and linkages to all available income support programs.

Resources

LIRA is funded by the LIRA Discount Charge in NFG's tariff. A charge is included in rates to provide for the full recovery of costs. Table II-1 displays the projected LIRA budget for 2017 through 2020. The costs were expected to be approximately \$2.54 million in 2020.

¹⁶Warren EOC, Erie County Housing Authority, and GECAC are the WAP community agencies that are on the NFG Advisory Committee. Stakeholders from PULP, the Office of the Consumer Advocate, and the PUC also attend the Committee meetings.

**Table II-1
LIRA Projected Budget**

	2017	2018	2019	2020
LIRA Budget	\$1,555,212	\$2,323,457	\$2,434,767	\$2,535,559

Table II-2 displays LIRA program expenditures for 2016 through 2018. Actual expenditures were \$1.85 million in 2018.

**Table II-2
LIRA Expenditures**

LIRA Expenditures	2016	2017	2018
Administrative	\$236,424	\$227,077	\$302,960
CAP Credits	\$655,653	\$791,565	\$1,093,008
Arrearage Forgiveness	\$277,518	\$181,008	\$453,805
Total	\$1,169,595	\$1,199,650	\$1,849,773

Outreach

Outreach for NFG's Universal Service Programs is provided through the following methods.

- Mail, telephone campaigns, meetings, and radio shows.
- Social media.
- Targeting mailings for potential LIRA and LIURP participants.
- Reports generated for confirmed low-income and/or LIHEAP recipients.
- Participating in community events including senior and legislative expos, task forces, and community and agency boards.
- The Biannual Universal Service meetings with local agencies in NFG's service area.
- BE Utility Wise Annual Meeting in partnership with FirstEnergy and the PUC.
- Training for NFG Consumer Business staff for enrollment campaigns and compliance.
- Training for operational employees.
- Universal Service Program targeted outreach with United Way agencies, Children and Youth, Aging Offices, CareerLINK Community, and schools in Erie County.
- LIHEAP outreach through bill inserts, media, community outreach locations, letters, training, meetings, and information provided to community agencies, social service agencies, trade schools, unions, universities, WIC, and mass transit sites.
- Information on NFG's website.

Participation

There is no cap on LIRA enrollment. NFG has identified approximately 29,000 customers as having income at or below 150 percent of the federal poverty level (FPL) based on receipt of LIHEAP and on income and household expense analyses performed during payment arrangement negotiations. LIRA targets payment-troubled, low-income customers

who have difficulty keeping their payment arrangements and may be in danger of having their services terminated.

LIRA had 8,575 customers enrolled as of October 2016. In August 2016 NFG had a 40 percent increase in rates which should have resulted in more referrals and enrollments. NFG implemented an initiative to achieve a minimum LIRA participation rate of 9,000. However, Table II-3 shows that participation was under 8,000 in 2018.

**Table II-3
LIRA Participation as of December 2016-2018**

Poverty Level	2016	2017	2018
≤50%	959	976	953
51% - 100%	4,248	4,111	3,851
101% - 150%	2,833	2,934	2,924
Total	8,040	8,021	7,728

NFG conducted additional outreach in 2020 in an attempt to increase LIRA participation. Possible LIRA candidates were identified from accounts in collection and eligible for Crisis funding. Additionally, they sent 1,000 postcards each week between February and May to potential LIRA-eligible customers. Completion of these initiatives resulted in 600 new LIRA enrollments.

NFG also stated that recent use of social media should help to increase participation. They are also working on a committee to assess how utilities can obtain information from the PA Department of Human Services (DHS) to facilitate increased customer enrollment in LIRA. They have discussed with FirstEnergy cross reference of CAP customers with appropriate releases and customer interest.

Eligibility

NFG customers are eligible for LIRA if they meet the following requirements.

1. Gross household income is at or below 150 percent of the FPL.
2. Customer is payment-troubled, defined as having an arrearage on the account at the time of application or at least one current, cancelled, or defaulted arrangement on the account at the time of application.
3. Heating customer.
4. Purchases gas from NFG, rather than an alternate supplier.

Benefits

Discounts are based on the customer's income, household size, and gas rates. They are developed to meet the affordable bill target and average LIRA usage, and are then rounded to the nearest ten percent.

- The minimum discount provided is ten percent.
- The minimum monthly payment is \$12.

- All participants are placed on a budget plan.

LIRA discounts were developed to meet the target energy burdens on average.

- Customers at or below 50% of the FPL: 6.5%
- Customers from 51% - 100% FPL: 8.0%
- Customers from 101% - 150% FPL: 9.0%

NFG monitors the energy burden of LIRA customers for review of participants who are outside of the Commission’s affordability guidelines. These accounts are reviewed for LIHEAP participation and possible weatherization.

Discounted rates are based upon household income and the number of household members. Prior to June 1, 2018 the following discounts were applied.

**Table II-4
LIRA Discounts Prior to June 1, 2018**

Income	Household Size										
	1	2	3	4	5	6	7	8	9	10	11-14
\$0	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
\$1,000	10%	10%	10%	10%	10%	20%	20%	20%	30%	30%	30%
\$2,000	10%	10%	20%	20%	20%	20%	30%	30%	30%	30%	30%
\$3,000	20%	20%	20%	20%	30%	30%	30%	40%	40%	40%	30%
\$4,000-\$6,000	30%	30%	30%	30%	40%	40%	40%	40%	40%	40%	40%
\$7,000	10%	20%	30%	30%	30%	40%	40%	40%	40%	40%	40%
\$8,000	10%	20%	30%	30%	30%	30%	40%	40%	40%	40%	40%
\$9,000	10%	10%	20%	20%	30%	30%	30%	40%	40%	40%	40%
\$10,000	10%	10%	20%	20%	20%	30%	30%	30%	30%	30%	30%
\$11,000	10%	10%	10%	10%	20%	20%	20%	30%	30%	30%	30%
\$12,000	10%	10%	10%	10%	10%	10%	20%	20%	20%	20%	20%
\$13,000	10%	10%	10%	10%	10%	10%	10%	20%	20%	20%	20%
\$14,000-\$18,000	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
\$19,000-\$24,000	0%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
\$25,000-\$29,000	0%	0%	10%	10%	10%	10%	10%	10%	10%	10%	10%

The Commission ordered NFG to remove LIHEAP from the LIRA discount calculation effective June 1, 2018. The table below shows the revised discounts.

**Table II-5
LIRA Discounts Beginning June 1, 2018**

Income	Household Size							
	1	2	3	4	5	6	7	8-14
\$0-\$3,000	80%	80%	80%	80%	80%	80%	80%	80%
\$4,000	70%	70%	70%	70%	80%	80%	80%	80%
\$5,000	70%	70%	70%	70%	70%	70%	70%	70%
\$6,000	60%	60%	60%	60%	60%	70%	70%	70%
\$7,000	40%	50%	60%	60%	60%	60%	60%	60%
\$8,000	30%	40%	50%	50%	50%	50%	60%	60%
\$9,000	20%	20%	40%	40%	50%	50%	50%	50%
\$10,000	10%	10%	40%	40%	40%	40%	50%	50%
\$11,000	10%	10%	10%	30%	40%	40%	40%	40%
\$12,000	10%	10%	10%	20%	30%	30%	40%	40%
\$13,000	10%	10%	10%	10%	20%	30%	30%	30%
\$14,000	10%	10%	10%	10%	20%	20%	30%	30%
\$15,000	10%	10%	10%	10%	10%	20%	20%	20%
\$16,000	10%	10%	10%	10%	10%	10%	10%	20%
\$17,000-\$18,000	10%	10%	10%	10%	10%	10%	10%	10%
\$19,000-\$24,000	0%	10%	10%	10%	10%	10%	10%	10%
\$25,000-\$29,000	0%	0%	10%	10%	10%	10%	10%	10%

NFG has preferred a discount model to a percent of income payment, as they believe that the gas costs should be tied to usage to provide the customer with more control over the bill. They believe that LIRA customers should be engaged in managing their usage and heating costs.

Arrearage forgiveness equal to 1/24 of the arrearage is provided for up to 36 months if needed. Customers must make monthly payments that are equal to or greater than the billed amount to receive arrearage forgiveness. Each month the bill is paid on time, 1/24 of the amount eligible for forgiveness is eliminated. If the customer pays the to-date balance down to zero, the corresponding forgiveness will be applied, as long as it was paid within the first 36 months of enrollment. If the customer does not have the entire balance forgiven in the first 24 months, the customer has an additional 12 months for potential forgiveness of any remaining balance.

Participants can continue on LIRA after their full pre-program arrearage is forgiven.

Each LIRA participant receives energy education, and an audit if their usage exceeds that of a typical residential customer. The following targeting is used based on annual usage.

- Customers with usage up to 105 MCF receive general written energy education materials including tips on controlling gas usage in the home.
- Customers with usage from 106 to 130 MCF are scheduled for an auditor to come and provide recommendations.
- Customers with usage of more than 130 MCF are referred to the Low-Income Usage Reduction Program for evaluation. If eligible, work is performed. If not eligible, the participant is scheduled for an individual energy audit where residence-specific recommendations for usage reduction are made.

Customer Responsibilities

LIRA participants agree to the following responsibilities.

- All adult household members become ratepayers, excluding dependent children and dependents over 65. They are each held responsible for any arrearages and utility bills.
- All household income must be verified.
- Monthly payments are required to avoid service termination.
- No extensions or arrangements are offered.
- If qualified, the ratepayer must agree to weatherization services.
- If applicable, the ratepayer must agree to apply annually for LIHEAP.

Referral and Enrollment

The NFG Consumer Business Department (or other NFG departments that encounter customers who may benefit from LIRA) refers customers to LIRA and explains the program, its benefits, and the participant's responsibilities. Community agencies may also refer customers to LIRA. A 30-day hold is placed on the customer's account when the LIRA referral is made. Referred customers are then contacted by telephone and/or mail to determine LIRA eligibility.

Dival Safety Incorporated is NFG's third-party contractor that processes LIRA applications. They have the following responsibilities.

- Intake – contact referred customers and complete the enrollment process
- Reverification
- Education – contact the customer by phone to review LIRA requirements and benefits with the customer
- Customer contact on incoming and outgoing phone calls
- Mailings and processing incoming mail
- Application scanning and indexing
- Document management and storage
- Maintaining the LIRA customer database
- Daily reports on the number of new and reverified applications received, completed, in process, and letters sent
- Daily reports on education calls or contacts, average talk time, and total talk time

- Reporting on completing activities

Matrix Imaging is responsible for invitations and reverification mailings. Following referral, customers are mailed an automatically generated packet with an invitation letter, informational page, application, and postage-paid return envelope. Customers must complete the application form and agree to the following.

- Be enrolled in the Budget Plan.
- Provide names and social security numbers (or other forms of identification) of all household residents. Other forms of identification include driver's licenses, state-issued identification cards, valid passports, green cards, DHS verification of benefits, copy of mortgage, lease, or deed.
- Adult residents become ratepayers.
- Verify income eligibility.
- Reverify income periodically.
- Notify NFG if income or household size changes.
- Must meet eligibility requirements to receive LIURP services.
- If applicable, apply annually for LIHEAP.

The applicant has ten days to return the LIRA application. A follow-up letter is mailed to those who do not reply. Following that letter, the LIRA offer is withdrawn unless special needs or circumstances are identified.

Once received, all information on the application is checked. Dival Safety reported that 35 to 50 percent of applications do not include complete financial documentation. For example, while customers are required to provide four weeks of income information, they often only provide one pay stub, showing one or two weeks of income data. Customers may also fail to provide information on child support or public assistance. According to Dival, the financial documentation requirements are not listed clearly on the application. They stated that the requirements for the financial documentation are listed "in small writing" at the bottom of the frontside of the application.

Other application issues are that customers sometimes forget to sign the application, fail to provide social security numbers, or forget to fill out the back side of the application.

Follow-up calls are made if needed to obtain additional information. If the customer cannot be contacted by phone, a letter is mailed and the applicant is provided ten days to respond. If there is no response, the LIRA offer is withdrawn. Additional outreach may be made if special needs have been identified.

Original documents are returned to the customer after income information is verified. Applicants are either accepted or rejected, and are notified by mail. Accepted customers also receive a copy of LIRA Program Features.

If accepted, a representative attempts to contact the customer by phone to review LIRA and ensure that the customer understands LIRA requirements. The following information is provided.

- When the first LIRA bill is due.
- The budget billing plan and the billing amount that is due.
- That monthly payments may increase or decrease depending upon usage and rates.
- The customer is requested to apply for a LIHEAP grant.
- The importance of paying bills by the due date to receive arrearage forgiveness.
- No payments or extensions are provided if the bills are not paid on time. The account is immediately eligible for collections actions.

Dival reported that customers often call to request an extension on their ten-day deadline to submit their application or follow-up information. Dival stated that many customers have expressed interest in submitting their applications via email. Customers are wary of mailing their application because of a concern that it may be lost in transit or not reach Dival before the submission deadline.¹⁷

LIRA Bills

The LIRA bill provides comprehensive information to the customer regarding their charges and program benefits, including the following.

- Current charges
- Budget plan adjustment
- LIRA discount percentage
- LIRA discount amount
- Usage history
- Beginning LIRA arrearage balance
- LIRA arrearage balance forgiven
- Remaining LIRA arrearage balance eligible for forgiveness

Moves

If the household moves, the LIRA rate is transferred and continued. If only part of the household moves, the remaining household members must be identified on a new signed LIRA application, income must be verified, and the responsible LIRA ratepayers must be confirmed. Any overdue balances will be reflected on the first LIRA bill at the new address. If the previous account was terminated for non-payment, the ratepayers must pay a down payment toward an arrangement covering the pre-LIRA unforgiven balances. A customer who moves will continue with the arrearage forgiveness component for the remaining months not used.

Follow-Up – Payment Reminders and LIHEAP

Customers receive calls approximately seven days before each bill is due to encourage timely payments and help ensure the opportunity for arrearage forgiveness.

¹⁷NFG reported that they will be researching and evaluating various options for LIRA applications including recommendations from the Advisory Committee.

Participants are informed when LIHEAP is open and reminded to name NFG as the primary fuel provider. The representative will assess whether the customer requires assistance with the LIHEAP application. If the call is not successful, a notification is sent by mail. There is also an annual mail campaign for LIRA participants who did not receive LIHEAP benefits in the previous season. Smartphone calls are also made to provide a LIHEAP reminder.

Recertification

Customers must reverify their status every two years unless their household situation changes or they report zero income, inexplicable increased consumption, or have not received LIHEAP. Those customers are required to reverify their status upon request. Zero income customers are required to reverify every three months and complete a statement of benefits or zero income verification form.

NFG previously allowed customers to verbally verify their income on a telephone call. However, the Commission ordered NFG to require LIRA participants to document eligibility at least once every two years, with a waiver allowed for customers who receive LIHEAP grants. These customers must document their eligibility at least once every three years.

All active LIRA participants are mailed a reverification letter and an application to recertify. The customer is given ten days to respond. If there is no response, an additional letter is sent to remind the customer to return the information within ten days. If the customer does not respond to the second letter, the customer is cancelled, unless special circumstances are identified and follow-up may be required.

If the customer responds, all information is checked. Additional information may be requested in which case a phone contact is made first, followed by a letter. The customer is given another ten days to respond, after which the customer is subject to cancellation from the program. Special circumstances may be taken into consideration.

Depending on the information provided, the customer may be ineligible or the discount may be adjusted.

As directed by Commission order, the customer is not required to reverify when they move if there is no change in household members. This was a change from the previous Universal Service Plan.

Application of LIHEAP Grants

LIHEAP grants are applied to the customer's LIRA program responsibility and remain as a credit until the entire credit balance is depleted. This is a change that was made in the most recent three-year Universal Service Plan in response to a Commission order. While NFG informs participants that they are expected to apply for LIHEAP and direct funds to the NFG account, the customer remains on LIRA if they fail to apply for LIHEAP as long as they continue to meet all other LIRA eligibility criteria.

Collections Actions, Terminations, and Reconnections

NFG adheres to the following termination process from April 1 through November 30.

1. The collections process begins if the customer does not pay a monthly LIRA budget billing. This includes all required regulatory notifications and procedural steps. Customers will be informed of the steps they must take to avoid termination.
2. The customer must pay the amount in the termination notice prior to the scheduled termination date to avoid termination of service. This amount will include all missed LIRA payments (discounted amounts) that have not been paid while on the program.
3. The LIRA participant will not be offered a payment arrangement or extension.
4. Medical certifications will be honored for LIRA customers.

Termination notices will not be sent beginning December 1 and will not resume until the first billing cycle that produces a termination date of April 1 or later. Any customer who missed payments over the winter months will be sent a termination notice for all missed payments. This should not exceed five months of missed payments except in extenuating circumstances, such as a medical certification or a complaint to the Bureau of Consumer Services.

The customer must pay the termination notice amount and a \$69 reconnection fee to reinstate service. If the LIRA participant had a pre-program arrearage, the customer will be eligible for continued arrearage forgiveness if they completely catch up on the LIRA arrears and they have forgiveness months remaining (within the 36 months allotted).

If the customer is not eligible for arrearage forgiveness.

- The customer may be required to pay part or all of the arrearage.
- NFG may negotiate a payment arrangement specific to the pre-program arrearage.
- The duration of the payment arrangement will depend on factors such as the size of the arrearage, the ability of the ratepayer to pay, the payment history, and the length of time over which the balance was accumulated.
- If a customer is shut off after negotiating a payment arrangement, the customer is required to pay the entire arrearage to have service restored. No arrangement will be offered on the missed LIRA payments or the pre-program arrearage.

All customers on the account are responsible for the accrued balance.

B. Low-Income Usage Reduction Program (LIURP)

The Low-Income Usage Reduction program (LIURP) helps low-income customers to reduce their energy usage and energy bills by installing energy-saving measures.

Resources

NFG's annual LIURP budget is \$1,300,000. The costs are allocated approximately as follows.

- \$300,000 for repair or replacement of furnaces and water heaters for owner-occupied customers that use less than 130 MCF per year, with income at or below 200 percent of the FPL.
- \$100,000 for administrative costs.
- \$813,000 for weatherization jobs.

Any budgeted funds that are not spent are rolled over to the following year.

Table II-6 shows that 304 jobs were completed in 2018, with an average cost of \$5,208.

Table II-6
LIURP Jobs and Average Job Costs

LIURP Jobs and Expenditures	2016	2017	2018
Jobs Completed	254	243	304
Average LIURP Costs	\$4,585	\$4,567	\$5,208

Eligibility

Customers are eligible for LIURP if they meet the following criteria.

- Annual usage of more than 130 MCF.
- Arrearages.
- Income at or below 150 percent of the FPL.
- Up to 20 percent of budget spent on customers between 151 and 200 percent of the FPL with special needs including seniors, customers with medical needs or disabilities, and/or customers with young children in the home.
- Residence at the premise for at least one year with 12 months of continuous service.

Referrals

In addition to direct referrals from CAP, customers are referred to LIURP in the following ways.

- NFG's call center generates referrals based on calls from payment-troubled customers, customers having problems with their bill, or those just interested in weatherization programs.
- NFG's outreach, including bill stuffers or social media (NFG just started Facebook and Twitter), results in inquiries from customers.
- Agencies refer customers for LIURP.
- NFG reviews all accounts that receive LIHEAP for potential LIURP participants.
- Neighbor for Neighbor award recipients are also reviewed for LIURP eligibility.

Service Delivery

NFG bids the LIURP work out to community agencies and private contractors to obtain the lowest prices. They currently work with seven organizations who provide these services. The Community Action Agencies (CAAs) that NFG works with are not able to complete as many LIURP jobs as NFG needs. Therefore, NFG has recently increased the use of independent contractors.

NFG provides screened customers to contractors along with the customer's consumption history. The contractors are instructed to call the customer five times at different times on different days, and then to send a letter within five days of the last phone attempt. If the customer does not respond within a week, the job is cancelled.

Evening and weekend appointments are made for the customer if needed.

A key challenge faced with LIURP is lack of customer response. NFG sends an informational LIURP letter to the customer at the same time that they send the referral to the service delivery organization. This letter informs the customer that they will be contacted by the particular organization. In an effort to increase customer response, NFG is now also making phone calls to these customers prior to sending their names to the organizations.

Services

The LIURP auditor is responsible for inspecting the customer's home to determine current home conditions and actions the customer can take to reduce energy usage.

The auditor assesses the home, including the following specific conditions.

- Insulation levels
- Window and door condition
- Heating system and hot water tank visual inspection and verification of safe combustion and venting

The auditor reviews the findings with the customer and develops a list of actions for the customer to take to reduce energy usage.

LIURP participants receive the following services. Measures are installed when they are found to be cost-effective.

- A heating system safety check.
- An energy audit, including energy education.
- Wall and/or attic insulation when appropriate.
- Blower door-guided air sealing.
- Other energy conservation measures.
- Health and safety measures (up to \$250).
- Incidental minor repairs such as window repair, venting/pipe issues, and chimney repair (up to \$100).
- A post inspection by an NFG representative (25 percent of completed jobs).

The Emergency Repair and Replacement Program (ERRP) provides the services described in Table II-7. Heating and water replacements are only performed for home owners.

**Table II-7
Emergency Repair and Replacement Measures**

Emergency Repair & Replacement Measures	2015	2016	2017
Water Heater Replacement	61	33	53
Furnace or Boiler Replacement	35	42	30
Heating System Repair	4	10	11
Water Heater Repair	0	1	0
Total Jobs	100	86	94

NFG coordinates services with agencies and other available weatherization programs.

Inspections

NFG inspects 25 percent of jobs completed to verify measures installed and customer satisfaction.

Energy Savings

Table II-8 provides findings from NFG's annual LIURP evaluation. The program saved an average of 18 to 20 percent of pre-treatment gas usage from 2015 through 2017, a high savings rate, likely due to effectively targeting high-usage customers.

**Table II-8
LIURP Jobs and Average Energy Savings**

Year	Pre # Jobs	Pre Usage (MCF)	Post # Jobs	Post Usage (MCF)	Energy Savings	
					MCF	%
2015	141	167.7	137	136.6	31.1	18.5%
2016	161	192.1	141	157.4	34.7	18.1%
2017	147	197.8	131	157.5	40.3	20.4%

Coordination

NFG uses the following methods to coordinate LIURP with other low-income energy efficiency programs.

- NFG exchanges customers with FirstEnergy. However, this does not result in many coordinated NFG LIURP jobs. First Energy is able to identify some non-heating customers to participate in their program, which helps these customers increase energy affordability.
- The CAA's will call NFG when they are doing a WAP job and check if the customer can also receive NFG LIURP. If approved, they will do the work and bill NFG.
- A recent PA Home Performance Conference session established a baseline and best practices for many different measures. This will help to improve consistency and aid in program coordination.

NFG feels that there are additional opportunities for improvement in coordination that they will pursue.

C. Neighbor for Neighbor Heat Fund

The Neighbor for Neighbor Heat Fund provides assistance to prevent disconnection of utility services, to pay overdue bills, to purchase heating fuel, and to repair or replace heating equipment.

The Neighbor for Neighbor Advisory Board is comprised of human service agency representatives and coordinates the fund. The Greater Erie Community Action Committee is the financial agency. Eleven designated service agencies located across the counties served by NFG screen and process applications.

Resources

The fund is supported by public donations and an NFG stockholder match of up to \$100,000. The fund has historically received donations over \$100,000 per year.

Eligibility

The eligibility criteria for the fund are as follows.

- One of the following:
 - 55 years or older, or
 - On disabled, handicapped income, or unemployment income, or
 - Able to demonstrate a certified medical emergency.
- Resident in NFG's service territory (but not necessarily an NFG customer).
- Made good faith payments. When the customer fills out the paperwork with the CBO, the agency will determine if the customer is making an honest effort to pay the bill. The payments do not have to be in full or total a set amount.
 - Three good faith payments within the last year.
 - A fourth one within the last ninety days. This payment must be equal to 15 percent of the outstanding bill or \$150, whichever is less.

Additional criteria are as follows.

- Need must be evident.
- Resources are not sufficient to meet energy needs.
- Other energy assistance programs have been exhausted.

NFG makes modifications to the Neighbor for Neighbor Program based on community needs, at the Board's direction. As a result of the COVID crisis, the last good faith payment normally required within the last 90 days has been temporarily eliminated.

NFG personnel, community agencies, or the customer may refer him/herself for assistance. NFG conducted outreach presentations at all Career Link and Community Resources for Independent offices, and United Way Organizations. NFG also conducts bi-annual outreach

meetings, targeted meetings, and an Annual Be Utility Wise Conference to inform community agencies of NFG's Universal Service Programs.

Benefits

The maximum grant amount is \$400 for natural gas applicants and \$200 for non-natural gas applicants. Customers may only receive one grant within a rolling 12 months. Grants are issued to the vendor for payments and the contractor for repairs. Grants can be applied to energy sources other than natural gas, except electricity.

D. Customer Assistance and Referral Evaluation Services Program (CARES)

The Customer Assistance and Referral Evaluation Services (CARES) Program assists low-income, fixed income, special needs, and payment-troubled customers who are experiencing short-term financial hardship.

CARES aims to address two primary issues.

1. **Health and Safety Concerns:** CARES provides temporary protection from termination until financial assistance is found or payment arrangements can be made. NFG staff work individually with select payment-troubled customers to maximize their ability to pay their utility bills.
2. **Customers with Special Needs:** These customers include those who have experienced a family crisis such as loss of income, divorce, or major illness; and those with physical or mental disabilities, low incomes, or are older adults. CARES provides case management services including payment arrangements and referrals. The referrals may include programs that provide cash assistance, food, shelter, employment, and medical assistance.

Resources

The CARES budget is \$4,125 each year from 2017 through 2020. Enrollment is not expected to exceed 50 customers per year.

**Table II-9
CARES Expenditures**

	2016	2017	2018
CARES Expenditures	\$4,141	\$4,206	\$4,523

Eligibility

CARES is provided to payment-troubled customers with temporary special circumstances, a temporary inability to pay, and who are in danger of having service terminated. Except in unusual circumstances, the CARES customer is low-income, a senior, or a special needs customer.

Most referrals are provided by Consumer Business and Operation field personnel, but any department within NFG or Human Service agencies may refer a customer for CARES.

Benefits

A 30-day CARES hold is placed on the account to allow NFG time to process the referral. Referred customers are contacted by NFG to determine the best method of helping the customer. Contacts may include telephone calls, letters, and additional follow-up.

The CARES representative conducts an in-depth analysis of the customer's payment situation, including documenting income and expenses. If the customer can pay the Budget plus an amount toward the arrears, a Budget plus arrangement is negotiated. If the customer is unable to pay that arrangement, the customer can receive a CARES flat payment arrangement which can be less than the budget plan and cannot exceed four months.

The CARES representative assesses the causes of the customer's bill payment problems and develops a referral and action plan to obtain assistance for the customer. This assistance may include financial assistance, medical and mental health services, food, clothing, shelter, or other assistance.

LIHEAP Outreach

As part of CARES, NFG conducts annual LIHEAP outreach campaigns with educational letters, mailings, news media releases, and advertising. Many outreach methods are used.

- Awareness cards are mailed to agencies, grocery stores, pharmacies, Walmart, public venues such as Libraries, and are provided to NFG Operations Personnel.
- Partnering with legislators, NFG completes LIHEAP and CAP Customer open house assistance.
- Outreach personnel are scheduled on talk radio shows highlighting available program funds and customer assistance programs.
- Outreach staff also provide information through Community School initiatives.
- In 2019 NFG started to use various forms of social media to increase awareness of assistance programs including LIHEAP.
- NFG's website is currently being modified to provide a better vehicle for communicating information.

III. Program Data Analysis

This section provides program and participation statistics for LIRA, LIURP, the Neighbor for Neighbor Heat Fund, and CARES.

A. LIRA Program Statistics

Table III-1 shows the current program status (at the time of data download in March 2020) of participants in the following analysis groups.

- All 2019 LIRA Participants: These are all customers who participated in LIRA at any point in 2019.
- Treatment: These are customers who enrolled in LIRA between July 2018 and December 2018 and did not participate in LIRA in the year prior to enrollment.
- Later Participant Comparison: These are customers who enrolled in LIRA between July 2019 and December 2019 and did not participate in LIRA in the two years prior to enrollment.
- All 2017-2019 LIRA Participants Groups: These are all customers who participated in LIRA between 2017 and 2019.

All participants include everyone in the group described and the Analysis Group is those that had enough billing data for the impact analysis.

The table shows that at the time of data download, 70 percent of the 2019 participants and 42 percent of the 2017-2019 participants were still active in LIRA.

**Table III-1
Current Program Status**

Status	All 2019 LIRA Participants		Treatment Group		Later Participant Comparison Group		All 2017-2019 LIRA Participants
	All	Analysis Group	All	Analysis Group	All	Analysis Group	
Observations	9,856	7,371	1,284	348	1,249	246	16,752
Active	70%	82%	50%	68%	80%	90%	42%
Cancelled	30%	18%	50%	32%	20%	10%	58%
Total	100%	100%	100%	100%	100%	100%	100%

Table III-2 displays the most recent and original year of enrollment for the 2019 LIRA participants. The table shows that 31 percent first enrolled before 2015 and 21 percent first enrolled in 2019. Many of the LIRA participants are in the program for several years.

Table III-2
Year First Enrolled & Year Most Recently Enrolled in LIRA

Year	All 2019 LIRA Participants			
	Year First Enrolled		Year Most Recently Enrolled	
	All	Analysis Group	All	Analysis Group
Observations	9,856	7,371	9,856	7,371
Before 2015	31%	37%	25%	30%
2015	4%	5%	3%	3%
2016	4%	4%	3%	3%
2017	15%	16%	14%	15%
2018	25%	24%	26%	25%
2019	21%	14%	29%	22%
2020	-	-	1%	1%
Total	100%	100%	100%	100%
Mean	2015	2014	2016	2015

Table III-3 displays the active LIRA participation length, the sum of all periods where a customer was actively enrolled in the LIRA program. The time of active participation was always continuous, as customers often re-enroll in LIRA after being removed. Of the 2019 participants who had gaps in participation, half had less than a one-month period as their longest gap in participation, 75 percent had less than three months as their longest gap, and 90 percent had less than 11 months as their longest gap. The mean length of participation for the 2019 participants was 4.6 years.

Table III-3
Length of Active LIRA Participation since First Enrollment

Length of Active Participation (Years)	All 2019 LIRA Participants			
	Including Customers with Participation Gaps > 6 months		Excluding Customers with Participation Gaps > 6 months	
	All	Analysis Group	All	Analysis Group
Observations	9,856	7,371	9,618	7,175
0 - 1 Years	33%	22%	34%	23%
2 - 3 Years	30%	34%	30%	34%
4 - 5 Years	8%	9%	8%	9%
6 - 10 Years	12%	15%	12%	15%
11 - 15 Years	11%	13%	11%	13%
15+	5%	6%	5%	6%
Total	100%	100%	100%	100%

Length of Active Participation (Years)	All 2019 LIRA Participants			
	Including Customers with Participation Gaps > 6 months		Excluding Customers with Participation Gaps > 6 months	
	All	Analysis Group	All	Analysis Group
Mean Years	4.6	5.4	4.6	5.4

Table III-4 displays the LIRA removal reason. The table shows that 53 percent were removed due to non-response and that 26 percent were removed because they moved. However, these were transfers rather than removals, as the current LIRA move process requires canceling the account at one address and then reactivating LIRA service at a new service address. NFG will modify their reporting with a new code that identifies these transferred accounts.

Eight percent were removed because they were over income, and five percent because they were shut off due to nonpayment. Other removal reasons include “Entered into an IP”, “Customer Request”, “Deceased”, and “No Longer Meets Eligibility Criteria.”¹⁸

Table III-4
Removal Reason for Removed Participants

Removal Reason	All 2019 LIRA Participants	
	All	Analysis Group
Observations	3,914	2,137
Non-Response	53%	71%
Moved	26%	8%
Over Income	8%	13%
Shut-Off Due to Nonpayment	5%	1%
Entered into an IP	2%	3%
Customer Request	2%	2%
Deceased	1%	<1%
No Longer Meets Eligibility Criteria	<1%	<1%
Other	3%	2%

Note: Customers with greater than one removal may have been removed for a different reason each time.

Table III-5 displays the percent of customers who re-enrolled in LIRA after being removed for the first time. Thirty-eight percent of the 2019 participants re-enrolled.

¹⁸NFG reports that they will research the data to determine if system improvements can provide additional insight in this area.

Table III-5
Re-Enrollment after First Removal
Customers who had Been Removed

Re-Enrollment	All 2019 LIRA Participants	
	All	Analysis Group
Observations	3,914	2,137
Re-Enrolled	38%	53%
Did Not Re-Enroll	62%	47%

Table III-6 displays the LIRA discount percentage for 2019 LIRA participants, according to the information recorded in the customer's account. While 63 percent of 2019 participants received a ten percent discount, four percent received an 80 percent discount. Only seven percent received a discount greater than fifty percent. The mean percentage discount was 21 percent.

Table III-6
LIRA Discount Percentage

LIRA Discount Percentage	All 2019 LIRA Participants	
	All	Analysis Group
Observations	9,854	7,371
10%	63%	64%
20%	7%	6%
30%	16%	17%
40%	4%	4%
50%	2%	2%
60%	2%	2%
70%	1%	1%
80%	4%	3%
Total	100%	100%
Mean	21%	20%

Note: Three customers did not have a discount amount listed in the Program Data after June 1, 2018 when the new discounts were implemented. These customers were excluded from this table. These two customers account for less than one percent of All 2019 Participants.

Table III-7 displays the LIRA discount amount for the 2019 LIRA participants. The table shows that 31 percent of participants received a discount amount between \$151 and \$300 and 17 percent received a discount between \$301 and \$600. The average annual discount was \$219.

**Table III-7
LIRA Discount Amount**

LIRA Discount Amount	All 2019 LIRA Participants	
	All	Analysis Group
Observations	9,853	7,371
>\$0 - \$20	8%	5%
\$21 - \$50	12%	9%
\$51 - \$100	12%	11%
\$101 - \$150	13%	14%
\$151 - \$300	31%	35%
\$301 - \$600	17%	20%
\$601 - \$1,000	4%	5%
>\$1,000	1%	2%
Total	100%	100%
Mean	\$219	\$241

Note: Three customers did not have a discount amount listed in the Program Data after June 1, 2018 when the new discounts were implemented. These customers were excluded from this table. These two customers account for less than one percent of All 2019 Participants.

Table III-8 displays the pre-program arrearages for the 2019 LIRA participants. The table shows that approximately half of the participants had pre-program arrearages. While 14 percent had arrearages of up to \$250, 18 percent had arrearages between \$251 and \$500. The mean pre-program arrears amount was \$596.

**Table III-8
Pre-Program Arrears at Time of Enrollment**

Pre-Program Arrearage Amount	All 2019 LIRA Participants	
	All	Analysis Group
Observations	9,856	7,371
≤\$250	14%	14%
\$251 - \$500	18%	17%
\$501 - \$750	9%	8%
\$751 - \$1,000	4%	4%
\$1,001 – \$1,500	4%	3%
>\$1,500	3%	2%
Did Not Have Arrearages	48%	53%
Total	100%	100%
Mean	\$596	\$531

Table III-9 displays the distribution of monthly arrearage forgiveness for the 2019 LIRA participants. Customers must pay their monthly billed amount to receive this arrearage forgiveness. The table shows that 36 percent of the 2019 LIRA participants had a monthly arrearage forgiveness amount of less than or equal to \$25. The average monthly arrearage forgiveness amount was \$25.

Table III-9
Monthly Arrearage Forgiveness Amount in Program Data

Monthly Arrearage Forgiveness Amount	All 2019 LIRA Participants	
	All	Analysis Group
Observations	9,856	7,371
≤\$25	36%	34%
\$26 - \$50	11%	9%
\$51 – \$100	4%	3%
>\$100	1%	1%
Did Not Have Arrearages	48%	53%
Total	100%	100%
Mean	\$25	\$22

B. LIURP/ERRP Program Statistics

Table III-10 provides information on participation in the Low-Income Usage Reduction Program (LIURP) and the Emergency Repair Replacement Program (ERRP) from 2017 to 2019. The table shows that there were 423 LIURP jobs and 344 ERRP jobs over this period. Mean LIURP job costs were \$5,287 in 2019 and mean ERRP job costs were \$2,569 in 2019. (Note that Table II-6 provides data based on NFG program statistics with the job completion date. Table III-10 is based on analysis of individual participant records with the LIURP enrollment date. As a result, numbers in the two tables differ.)

Table III-10
LIURP and ERRP Participation and Costs

Participation and Costs	LIURP				ERRP			
	2017	2018	2019	2017-2019	2017	2018	2019	2017-2019
# of Jobs	149	149	125	423	95	134	115	344
# of Unique Customers	149	149	125	423	92	129	114	329
Mean Job Cost	\$4,489	\$5,302	\$5,287	\$5,011	\$1,888	\$2,299	\$2,569	\$2,276
Total Job Costs	\$668,864	\$789,966	\$660,894	\$2,119,724	\$179,379	\$308,084	\$295,465	\$782,927

Table III-11 displays the distribution of LIURP job costs in 2017 through 2019. The table shows that 29 percent of the 2019 LIURP jobs had costs between \$2,500 and \$5,000 and 49 percent had costs between \$5,000 and \$10,000. The mean 2019 LIURP job cost was \$5,287.

Table III-11
Distribution of LIURP Job Costs

Job Costs	LIURP			
	2017	2018	2019	2017-2019
Number of Jobs	149	149	125	423
< \$1,000	3%	1%	2%	2%
\$1,000 - \$2,500	16%	11%	15%	14%
\$2,501 - \$5,000	46%	40%	29%	39%
\$5,001 - \$10,000	34%	48%	49%	43%
> \$10,000	1%	1%	5%	2%
Total	100%	100%	100%	100%
Mean	\$4,489	\$5,302	\$5,287	\$5,011

Table III-12 displays the distribution of ERRP job costs in 2017 through 2019. The table shows that 37 percent of the 2019 ERRP jobs had costs between \$1,000 and \$2,500 and 32 percent had costs between \$2,500 and \$5,000. The mean 2019 ERPP job cost was \$2,569.

Table III-12
Distribution of ERRP Job Costs

Job Costs	ERRP			
	2017	2018	2019	2017-2019
Number of Jobs	95	134	115	344
< \$500	7%	9%	8%	8%
\$500 - \$1,000	18%	10%	10%	12%
\$1,001 - \$2,500	47%	43%	37%	42%
\$2,501 - \$5,000	24%	28%	32%	28%
> \$5,000	3%	10%	13%	9%
Total	100%	100%	100%	100%
Mean	\$1,888	\$2,299	\$2,569	\$2,276

Table III-13 displays the percent of jobs that received specific measures in 2017 through 2019. The table shows that 94 percent of the 2019 LIURP jobs received insulation, 66 percent received air sealing, and 27 percent received heating system replacements. These are high measure penetration rates that led to the high program savings rates.

**Table III-13
LIURP and ERRP Measure Penetration Rates**

Measure	LIURP				ERRP			
	2017	2018	2019	2017-2019	2017	2018	2019	2017-2019
Number of Jobs	149	149	125	423	95	134	115	344
Air Sealing	62%	66%	66%	65%	0%	0%	0%	0%
Audit	100%	100%	99%	100%	63%	63%	54%	60%
Blower Door Test	13%	18%	25%	18%	0%	0%	0%	0%
Duct Sealing	3%	5%	8%	5%	0%	0%	0%	0%
Furnace Filter	15%	26%	14%	18%	0%	0%	0%	0%
Health and Safety	43%	59%	58%	53%	0%	0%	0%	0%
Heating System Repair	68%	62%	66%	65%	11%	16%	12%	13%
Heating System Replacement	15%	23%	27%	22%	34%	41%	47%	41%
Heating System Test	91%	88%	86%	89%	0%	0%	0%	0%
Insulation	95%	99%	94%	96%	0%	0%	0%	0%
Pipe Insulation	11%	3%	5%	6%	0%	0%	0%	0%
Plumbing Repair	26%	21%	13%	20%	0%	0%	0%	0%
Repairs	54%	65%	59%	59%	3%	3%	0%	2%
Showerhead/Aerator	1%	1%	0%	1%	0%	0%	0%	0%
Thermostat	20%	31%	26%	26%	0%	0%	0%	0%
Water Heater Insulation	3%	2%	2%	2%	0%	0%	0%	0%
Water Heater Replacement	8%	11%	19%	13%	56%	51%	50%	52%
Window/Door Treatment	80%	93%	83%	85%	0%	0%	0%	0%

C. Neighbor for Neighbor Program Statistics

Table III-14 displays information on the Neighbor for Neighbor grants awarded to NFG between 2017 and 2019. The table shows that 243 grants were awarded in FY 2019. The mean pledge amount was \$284.

**Table III-14
Neighbor for Neighbor Grants Awarded to NFG**

Neighbor for Neighbor Grants Awarded to NFG	Year			FY2017- FY2019
	FY2017	FY2018	FY2019	
Observations	245	316	243	804
Mean Pledge Amount	\$355	\$379	\$284	\$343
Total Pledged Amount	\$86,963	\$119,648	\$68,959	\$275,570

Non-customers may receive a Neighbor for Neighbor grant if they live in NFG’s service territory, in which case the grant will go towards the vendor that provides the household’s main heating fuel. Table III-15 displays Neighbor for Neighbor grants that were awarded to NFG and to other vendors. The table shows that 41 grants were awarded to other vendors in FY 2019 and the mean pledge amount was \$174.

**Table III-15
Neighbor for Neighbor Grants**

Neighbor for Neighbor Grants		Year			FY2017- FY2019
		FY2017	FY2018	FY2019	
Grants to NFG	Number of Grants	245	316	243	804
	Mean Pledge Amount	\$355	\$379	\$284	\$343
	Total Pledged Amount	\$86,963	\$119,648	\$68,959	\$275,570
Grants to Other Vendors	Number of Grants	34	57	41	132
	Mean Pledge Amount	\$294	\$298	\$174	\$259
	Total Pledged Amount	\$10,010	\$16,977	\$7,144	\$34,132

D. CARES Program Statistics

Table III-16 displays the CARES enrollment source. The table shows that 98 percent of the participants were referred to CARES by NFG in 2019.

**Table III-16
CARES Enrollment Source**

CARES Enrollment Source	Year of CARES Enrollment						2017-2019	
	2017		2018		2019			
	#	%	#	%	#	%	#	%
NFG	23	82%	29	94%	45	98%	97	92%
Agency	5	18%	2	6%	1	2%	8	8%
Total	28	100%	31	100%	46	100%	105	100%

Note: Each participant is included in the year of their most recent participation.

Table III-17 displays the total amount due at the time of CARES enrollment. The table shows that 22 percent had a balance between \$100 and \$500, seven percent had a balance between \$500 and \$1,000 and 15 percent had a balance of more than \$1,000 for the 2019 CARES enrollments. The mean balance for the 2019 CARES enrollments was \$691.

Table III-17
Total Amount Due at the Time of CARES Enrollment

Amount Due	Year of CARES Enrollment						2017-2019	
	2017		2018		2019			
	#	%	#	%	#	%	#	%
≤ \$0	9	32%	8	26%	19	41%	36	34%
\$1 - \$100	1	4%	4	13%	7	15%	12	11%
\$101 - \$500	9	32%	11	35%	10	22%	30	29%
\$501 - \$1,000	7	25%	4	13%	3	7%	14	13%
> \$1,000	2	7%	4	13%	7	15%	13	12%
Total	28	100%	31	100%	46	100%	105	100%
Mean	\$621		\$401		\$691		\$587	

Note: Each participant is included in the year of their most recent participation.

Table III-18 displays the number and percent of customers who received LIHEAP following CARES enrollment, and the mean LIHEAP grant amount for those customers. The table shows that 17 percent of CARES participants received LIHEAP in 2019, and the mean LIHEAP grant amount was \$356 for the recipients in 2019.

Table III-18
LIHEAP Receipt Following CARES Services

LIHEAP Receipt	Years of CARES Enrollment			2017-2019
	2017	2018	2019	
Number Received LIHEAP	9	8	8	25
Percent Received LIHEAP	32%	26%	17%	24%
Mean LIHEAP Grant - Recipients	\$206	\$389	\$356	\$312

Note: Each participant is included in the year of their most recent participation.

IV. LIRA Participant Interviews

This section provides findings from in-depth interviews conducted with participants in National Fuel Gas' Low-Income Residential Assistance Program.

A. *Overview & Methodology*

APPRISE conducted telephone interviews with 31 Low-Income Residential Assistance Program (LIRA) participants. The goal of the interviews was to understand the participants' decision to enroll in LIRA, challenges in program enrollment and reverification, understanding of LIRA benefits, and satisfaction with LIRA. This is qualitative research that provides insight into the program and how it is working, rather than quantitative statistics on program success.

A sample of 80 current LIRA participants was randomly selected from all current LIRA participants with usable phone numbers. LIRA participants were eligible to complete the interview if they were participating in the program at the time of the interview or had participated in the last year.

Advance letters were sent by mail to the selected LIRA participants. The letter notified LIRA participants that they would be called to participate in the survey, explained the purpose of the survey, and provided the option to call a toll-free number to complete the survey at their convenience. APPRISE staff conducted the interviews between April 20 and May 4, 2020.

A summary of findings from the interviews is presented in the following sections.

- Reasons for Participating and the Enrollment and Reverification Process
- LIRA Understanding and Impact
- Other Assistance
- Satisfaction and Recommendations

B. *Reasons for Participating and the Enrollment and Reverification Process*

This section provides information on why participants decided to enroll in LIRA and their overall experience with the enrollment and reverification process.

Participants were asked if they were currently participating in NFG's LIRA Program or if they had participated in the program within the past year. Table IV-1 shows that 30 respondents were participating in LIRA at the time of the interview, and one respondent had participated within the past year.

**Table IV-1
LIRA Participation Status**

Are you currently participating in NFG's LIRA Program? If no, have you participated in the program within the past year?		
	Currently Participating	Participated within Past Year
Yes	30	1
Don't Know	1	0
Not Applicable	0	30
Total	31	31

Participants were asked when they began participating in LIRA. Table IV-2 shows that 16 of the 31 interviewed participants enrolled two or more years ago. Nine participants enrolled one year ago, three participants enrolled this year, and three participants did not know when they enrolled.

**Table IV-2
LIRA Participation Length**

When did you begin participating in the LIRA Program?	
Two or More Years Ago	16
One Year Ago	9
This Year	3
Don't Know	3
Total	31

Participants were asked how they found out about LIRA.

- Ten participants reported that they found out about the program from a local, community action, government, or social service agency.
- Nine participants found out about LIRA through NFG representatives.
- Four participants found out about LIRA through a flyer or pamphlet sent with their NFG bill.
- Three participants found out about LIRA through friends or relatives.

Other information sources included Penelec's PCAP program, a shut-off notice, and Supplemental Security Income.

**Table IV-3
Awareness of LIRA Program**

How did you find out about the LIRA Program?	
Local Agency	10
NFG Representative	9
Flyer/Pamphlet with NFG Bill	4
Friend or Relative	3
Other	3
Don't Know	2
Total	31

Participants were asked why they decided to enroll in the LIRA Program. Table IV-4 shows that 19 participants decided to enroll to lower their gas bill. Eight enrolled because of their low or fixed income or finances, and three enrolled because they needed help and felt the LIRA Program could provide some assistance. One participant enrolled to prevent a shutoff.

**Table IV-4
Enrollment Reasons**

Why did you decide to enroll in the LIRA Program?	
Lower/More Affordable Energy/Gas Bills	19
Low/Fixed Income or Finances	8
Needed Help/Sounded Like it Could Help	3
Other	1
Total	31

Participants were asked how difficult it was to apply for LIRA overall. Table IV-5 shows that 29 participants reported that it was not too difficult or not at all difficult to apply. One participant reported that it was somewhat difficult to apply. This participant said it was hard for her to make copies of all the required documentation because she is legally blind.

Table IV-5
Difficulty of Applying for LIRA

Overall, how difficult was it to apply for the LIRA Program?	
Very Difficult	0
Somewhat Difficult	1
Not Too Difficult	10
Not at All Difficult	19
Don't Know	1
Total	31

Participants were asked if they had ever reverified for LIRA. Participants were reminded that reverifying means providing updated information about their household and income. Table IV-6 shows that 20 of the 31 participants said they had reverified.

Table IV-6
LIRA Reverification

Have you ever reverified for the LIRA Program?	
Yes	20
No	6
Don't Know	5
Total	31

Participants were asked how difficult it was to reverify for LIRA overall. Table IV-7 shows that of the 20 participants who reverified, 19 said it was not too difficult or not at all difficult to reverify.

Table IV-7
Difficulty of Reverifying for LIRA

Overall, how difficult was it to reverify for the LIRA Program?	
Very Difficult	0
Somewhat Difficult	1
Not Too Difficult	1
Not at All Difficult	18
Has Not Reverified*	11
Total	31

*This includes participants who were not sure whether they had ever reverified.

Participants were asked about any difficulties encountered with the LIRA enrollment or reverification process. All participants were read a list of steps involved in both enrollment and reverification. Participants were asked if they experienced difficulties with any of these steps during either enrollment or reverification (if they had reverified).

- Obtaining the application
- Understanding the application instructions
- Providing social security numbers/identification for all household members
- Providing income information for all household members with income
- Obtaining signatures from all household members over the age of 18
- Sending in the application
- Submitting the application before the deadline
- Other enrollment or reverification steps

Table IV-8 shows that 25 of 31 participants reported that none of these steps posed difficulties during enrollment, and 17 of the 20 participants who reverified reported no difficulties during reverification. The most common difficulty reported was providing income information for all household members with income. One participant said that providing this income information was a challenge during both enrollment and reverification because he had to search through a pile of paperwork to retrieve this income. Another participant who had difficulty with providing the income information during enrollment said she lacked internet access and had to go to a local library to print her pay stub.

Participants also faced difficulties obtaining an application and understanding the application instructions during enrollment. They also faced difficulties sending in the application and providing social security numbers and identification during reverification.

Table IV-8
Difficulties with LIRA Enrollment and Reverification

When applying/reverifying for the LIRA Program, did you have any difficulty with the following parts of the application process?		
	Applying	Reverifying
Observations	31	20
Providing Income Information for All Household Members with Income	2	2
Obtaining the Application	1	0
Understanding the Application Instructions	1	0
Providing SSN/IDs for All Household Members	0	1
Sending in the Application	0	1
Other	1	1
None	25	17
Don't Know	1	0

* Participants were able to select multiple answers.

Participants were asked if they received a phone call or voicemail explaining the LIRA Program and their responsibilities in the program after they first enrolled. Table IV-9A shows that 12 of the 31 interviewed participants said they received such a phone call or voicemail. Nine participants said they did not receive this call or voicemail and ten participants did not know if they received it.

Table IV-9A
Phone Call from NFG at Program Enrollment

When you first enrolled in the program, did you receive a phone call or voicemail explaining the LIRA Program and your responsibilities in it?	
Yes	12
No	9
Don't Know	10
Total	31

Participants who reported that they received this phone call or voicemail were asked if they found it helpful to understanding the LIRA Program and their responsibilities in the program. Table IV-9B shows that all participants found it to be either very helpful or somewhat helpful.

Table IV-9B
Helpfulness of Phone Call from NFG

How helpful was this call in helping you to understand the Low-Income Residential Assistance Program and your responsibilities in the program?	
Very Helpful	11
Somewhat Helpful	1
Did Not Receive Call or Voicemail*	19
Total	31

*This includes participants who did not know if they had received these calls.

C. LIRA Understanding & Impact

This section includes information about participants' understanding of the LIRA Program and the impact of the program on their ability to pay their bills.

Participants were asked if they felt that they had a good understanding of the benefits provided by LIRA. Table IV-10 shows that 28 participants reported that they had a good understanding of these benefits, while three participants reported that they did not have a good understanding of these benefits. When asked why they did not have a good

understanding of the benefits, one participant reported that the NFG representative that she spoke with did not provide much information on the program benefits.

Table IV-10
Understanding of LIRA Benefits

Do you feel that you have a good understanding of the benefits provide by the LIRA Program?	
Yes	28
No	3
Total	31

Participants were asked a series of questions to better understand their knowledge of the LIRA benefits.

- First, participants were asked what they felt were the benefits of the program.
- Next, participants were specifically asked whether they felt that lower gas bills or reduced arrearages were benefits of the program.
- Finally, participants were asked what they felt was the single most important benefit of the program.

Table IV-11 shows that before prompting about specific benefits, the most common response was lower energy or gas bills.

- 26 participants listed lower energy or gas bills as a benefit of the program.
- Six participants cited providing help to their family, other families, or other low-income people.
- Four cited being able to afford others bills or expenses.
- Four said it was saving money.

Other responses included budget billing, reduced arrearages, keeping gas service, the ability to do their own meter reading, improved home comfort, energy education, and helpful program staff.

When asked specifically about lower energy or gas bills, all participants agreed that this was a benefit of the program. When asked specifically about reduced arrearages, 20 participants said this was a benefit of the program, one participant said this was not a benefit, and ten participants did not know if this was a benefit of the program.

Twenty-five of the 31 interviewed participants reported that lower energy or gas bills was the most important benefit of the program. Four participants reported that the help to their family, other families, or other low-income people was the most important benefit, and two participants reported that reduced arrearages was the most important benefit of the program.

Table IV-11
LIRA Program Benefits

What do you feel are the benefits of the LIRA Program?			
Do you feel that lower gas bills/ reductions in your balance past due are benefits of the program?			
What do you feel is the single most important benefit of the program?			
	Unprompted	Prompted	Most Important
Observations	31	31	31
Lower Energy Bills / Gas Bills	26	31	25
Helps My Family / Other Families / Low-Income People	6	-	4
Can Afford Other Bills or Expenses	4	-	0
Save Money	4	-	0
Budget Billing	3	-	0
Reduced Money Owed to NFG / Reduced Arrearages	2	20	2
Keeping Gas Service / Not Having Service Turned Off	2	-	0
Other	4	-	0
Don't Know	1	-	0

Participants were asked how difficult it was to pay their monthly NFG bills before participating and while participating in LIRA. Table IV-12 shows that 27 of the 31 participants found it very difficult or somewhat difficult to pay their NFG bill before participating in LIRA, and only two participants found it very difficult or somewhat difficult to pay their NFG bills while on LIRA.

Table IV-12
Difficulty Paying NFG Bills Before and After Enrolling in LIRA

How difficult was it to pay your monthly NFG bill before you began participating in LIRA?		
While Participating in LIRA?		
	Before LIRA	While on LIRA
Very Difficult	11	0
Somewhat Difficult	16	2
Not Too Difficult	2	8
Not at All Difficult	2	21
Total	31	31

Participants were asked how important LIRA has been in helping them to make ends meet. Table IV-13 shows that 25 of the 31 participants reported that LIRA has been very important in helping them to make ends meet, and five participants reported that it has been somewhat important in helping them to make ends meet. One participant said that with the money she was saving from participating in the program, she could buy things like an extra jug of milk,

a loaf of bread, or a roll of toilet paper. Another participant said she “would freeze without [LIRA].”

Table IV-13
Importance of LIRA in Making Ends Meet

How important has the LIRA Program been in helping you to make ends meet?	
Very Important / Has Made a Very Big Difference	25
Somewhat Important / Has Made a Difference	5
Don't Know	1
Total	31

Participants were asked if they regularly receive calls or voicemails from NFG reminding them to pay their monthly bill. Table IV-14A shows that 17 participants reported that they receive these calls.

Table IV-14A
Bill Payment Reminders

Do you regularly receive calls or voicemails from NFG to remind you to pay your monthly bill?	
Yes	17
No	13
Don't Know	1
Total	31

Participants who reported that they receive calls or voicemails from NFG reminding them to pay their monthly bill were asked about the helpfulness of these calls. Table IV-14B shows that 15 of the 17 participants reported that the phone calls were either very helpful or somewhat helpful. The two participants who found the phone calls not at all helpful said that they know when their bills are due and do not need a reminder.

Table IV-14B
Helpfulness of Bill Payment Reminders

How helpful are these phone calls?	
Very Helpful	10
Somewhat Helpful	5
Not at All Helpful	2
Does Not Receive Payment Reminders*	14
Total	31

*This includes participants who did not know if they received phone calls or voicemail to remind them to pay their bill.

Participants were asked if they usually pay their full NFG bill each month. Table IV-15 shows that all but one participant reported that they pay their full NFG payment each month.

Table IV-15
Bill Payment Timeliness

Do you usually pay your full NFG payment each month?	
Yes	30
No	1
Total	31

D. Other Assistance

This section provides information about other benefits LIRA participants receive and other programs they participate in.

Participants were asked what energy education they have received through the program. Table IV-16A shows that 19 participants did not receive or did not know if they received any energy education through LIRA. Of the ten participants who received energy education, six said they received energy education materials, four said they received a LIURP energy audit or weatherization work, and two said they received a LIRA audit.

Table IV-16A
Energy Education

What energy education have you received through the program?	
Observations	31
Written Energy Education Materials	6
LIURP Energy Audit/Weatherization Work	4
LIRA Audit	2
None	14
Don't Know	5

*Participants were able to select more than one response.

Participants who received energy education were asked how helpful the education was in helping them to reduce their gas usage. Table IV-16B shows that 11 participants reported that the energy education was very helpful or somewhat helpful, and one participant reported that the energy education was not at all helpful. The participant who reported that the energy education was not helpful said she receives written energy education materials, but she only skims these materials. One participant who received an audit said that it was somewhat helpful, but he could not afford the weatherization measures that the LIRA representative recommended.

Table IV-16B
Helpfulness of Energy Education

How helpful was this energy education in helping you to reduce your gas usage?	
Very Helpful	6
Somewhat Helpful	5
Not at All Helpful	1
Not Applicable	19
Total	31

Participants were asked if they had received other benefits or participated in other programs as a result of participating in LIRA. Table IV-17 shows that only four participants reported that they received other benefits or participated in other programs as a result of participating in LIRA. Two participants reported that they received LIURP Weatherization and one participant reported that he received LIHEAP as a direct result of participating in LIRA. The other participant could not recall the names of benefits he received or programs he participated in as a result of participating in LIRA.

**Table IV-17
Other Benefits or Programs**

Have you received any other benefits or participated in any other programs as a result of participating in the LIRA Program?	
Yes	4
No	26
Don't Know	1
Total	31

Participants were also specifically asked if they receive benefits from LIHEAP. Table IV-18 shows that 27 participants reported that they received benefits from LIHEAP, three participants reported that they did not receive benefits from LIHEAP, and one participant did not know if she received benefits from LIHEAP.

**Table IV-18
LIHEAP Participation**

Do you receive benefits from the Federal Low-Income Home Energy Assistance Program also known as LIHEAP?	
Yes	27
No	3
Don't Know	1
Total	31

Participants who reported that they received benefits from LIHEAP were asked whether those benefits were applied to their electric bill, gas bill, or to another fuel type. Table IV-19 shows that 22 of the 27 who reported LIHEAP receipt said that their benefits were applied to their gas bill. Four participants reported that their benefits were applied to their electric bill and one reported that the benefits were applied to both their gas and electric bills.

**Table IV-19
LIHEAP Benefits Fuel Type**

Are you LIHEAP benefits applied to your electric bill or gas bill, or to another fuel type?	
Gas	22
Electric	4
Both Electric and Gas	1
Does Not Receive LIHEAP*	4
Total	31

*This includes participants who did not know if they received LIHEAP.

Participants who reported that they received benefits from LIHEAP were also asked whether they received those benefits before or after they began participating in the LIRA Program. Table IV-20 shows that 12 participants reported that they received LIHEAP benefits before participating in LIRA while ten participants reported that they received LIHEAP benefits after participating in LIRA.

Table IV-20
Timeline of LIHEAP Participation

Can you recall if you received LIHEAP before you began participating in the LIRA Program or after you began participating in the LIRA Program?	
Before Participating in LIRA	12
After Participating in LIRA	10
Don't Know	5
Does Not Receive LIHEAP*	4
Total	31

*This includes participants who did not know if they received LIHEAP.

E. Satisfaction and Recommendations

This section includes information about participants' overall satisfaction with LIRA and their recommendations for the program.

Table IV-21 shows that 29 participants reported that they were very satisfied with LIRA, and two participants reported that they were somewhat satisfied. The two participants who were not very satisfied with LIRA were asked to elaborate on why they were not very satisfied. One participant said the waiting time was a drawback. He had to wait a long time to obtain a program application at the assistance office and had to wait a long time for NFG to process his application. The other participant refused to elaborate on why he was not very satisfied.

Table IV-21
Overall Satisfaction with LIRA

Overall, how satisfied have you been with the LIRA Program?	
Very Satisfied	29
Somewhat Satisfied	2
Total	31

Participants were next asked about recommendations for LIRA. Seven participants offered the following ideas.

- Conduct more outreach about the LIRA Program. One participant said that if she had not called NFG for help with her bills, she would have never found out about the LIRA Program.
- Allow applicants/participants to take photos of documents and email them, instead of making copies.
- Provide a phone call reminder when people need to reverify.
- Clearly state on the bills when it will be time to reverify
- Send more materials on the different energy assistance programs that are offered.
- Process the applications more quickly

Before concluding the survey, participants were asked to share any last thoughts or ideas about LIRA. Participants offered the following comments.

- The LIRA Program has been helpful in lowering my bill and reducing my stress about high gas bills.
- The LIRA Program is a great program for low-income households.
- The program “has been a blessing” and I hope I can continue participating in it.

F. Summary of Findings

This section provides a summary of the findings from in-depth telephone interviews with 31 current and recent LIRA participants.

- **Participation Status:** All participants confirmed their knowledge of participation in LIRA. One participant did not know if she was currently participating in the program but reported that she participated in the program within the past year.
- **Awareness of LIRA Program:** Most participants found out about the LIRA Program through a local agency or through an NFG representative.
- **Enrollment Reasons:** Most participants reported that they decided to enroll to lower their gas bill or because of their low or fixed income or finances.
- **Difficulty of Applying for LIRA:** Twenty-nine of the 31 participants reported that it was not too difficult or not at all difficult to apply.
- **LIRA Reverification:** Twenty of the 31 participants said they had reverified for the program and 19 of those 20 said it was not too difficult or not at all difficult to reverify.
- **Phone Call from NFG at Program Enrollment:** Twelve of the 31 interviewed participants said they received a phone call or voicemail from NFG at the time of program enrollment. All participants who received a phone call from NFG at enrollment said the call or voicemail was either very helpful or somewhat helpful.¹⁹

¹⁹ NFG reports that Dival has reported an education success rate between 69 and 74 percent.

- **LIRA Benefits:** Of the 31 program participants, 28 reported that they had a good understanding of the benefits provide by NFG. When asked about the benefits offered by LIRA, they were most likely to report lower energy or gas bills.
- **Difficulty Paying NFG Bills Before and After Enrolling in LIRA:** Twenty-seven of the 31 participants found it very difficult or somewhat difficult to pay their NFG bill before participating in LIRA, and only two participants found it very or somewhat difficult to pay their NFG bills while participating in LIRA.
- **Importance of LIRA in Making Ends Meet:** Twenty-five of the 31 participants reported that LIRA had been very important in helping them to make ends meet, and five participants reported that it had been somewhat important in helping them to make ends meet.
- **Energy Education:** Twelve of the 31 participants reported that they received energy education or services through LIRA. Six said they received energy education materials, two said they received a LIRA Audit, and four said they received a LIURP energy audit or weatherization work.
- **LIHEAP Participation:** Twenty-seven of the 31 participants reported that they received LIHEAP benefits. Ten of these participants reported that they received LIHEAP benefits after participating in LIRA.
- **Overall Satisfaction with LIRA:** Overall, participants were satisfied with LIRA. Twenty-nine participants reported that they were very satisfied with LIRA, and two participants reported that they were somewhat satisfied. No respondents reported that they were dissatisfied.
- **Participant Recommendations:** Participants offered the following ideas for program improvement: conduct more outreach, allow applicants to submit photos of documents, and provide a reminder when people need to reverify via phone and via the NFG gas bill.²⁰

²⁰NFG reported that they have planned additional outreach including partnering with local agencies in their territory to provide open hours for appointments, assisting with onsite program enrollment, and emails to potential applicants once permissions are obtained. They are also planning walk-in unscheduled appointments to discuss Universal Service Programs, attending additional job fairs, increasing advertising, and using targeted messaging on their LED Customer Assistance Center Board. NFG will meet with the Advisory Committee to solicit additional ideas.

V. LIRA Impact Analysis

This section provides an analysis of LIRA's impact on affordability, bill payment compliance, arrearages, and collections actions. The section first describes the methodology for the analyses that were conducted, and then the findings from the analyses.

A. *Methodology*

This section describes the evaluation data and the selection of participants for the impact analysis.

Evaluation Data

NFG provided APPRISE with customer data, LIRA participation data, billing and payment data, and collections data from 2017 through 2019. NFG also provided data for a comparison group of LIHEAP recipients who did not participate in LIRA during this time period.

Selected Participants: Analysis Group

Customers who enrolled in LIRA between July 1, 2018 and December 31, 2018 and did not participate in LIRA in the year prior to this LIRA enrollment were included as potential members of the study group. This group was chosen for the analysis to focus on the revised LIRA discounts that were implemented in June 2018, and because one full year of post-program data is required for an analysis of program impacts. Additionally, results are presented for customers who participated in LIRA at any time during 2019 to assess the broader population of LIRA participants.

When measuring the impact of an intervention, it is necessary to recognize other exogenous factors that can impact changes in outcomes. Changes in a client's payment behavior and bill coverage rate, between the year preceding program enrollment and the year following enrollment, may be affected by many factors other than program services received. Some of these factors include changes in household composition or health of family members, changes in utility prices, changes in weather, and changes in the economy.

The ideal way to control for other factors that may influence payment behavior would be to randomly assign low-income customers to a treatment or control group. The treatment group would be given the opportunity to participate in the program first. The control group would not be given an opportunity to participate in the program until one full year later. This would allow evaluators to determine the impact of the program by subtracting the change in behavior for the control group from the change in behavior for the treatment group. Such random assignment is rarely done in practice because of a desire to include all eligible customers in the benefits of the program or to target a program to those who are most in need. Therefore, we constructed two comparison groups to match the treatment group as well as possible.

Nonparticipant Comparison Group

The nonparticipant comparison group is one of the groups that was constructed to control for exogenous factors. The comparison group was designed to be as similar as possible to the treatment group, those who received services and who we are evaluating, so that the exogenous changes for the comparison groups are as similar as possible to those of the treatment group. The comparison group was a random sample of customers who received LIHEAP in 2018 and did not participate in LIRA. These customers were replicated to represent customers who enrolled in LIRA in the third and fourth quarters of 2018 to match the treatment group's enrollment dates. Data were analyzed in the year before and the year after each quasi-enrollment date.

Later Participant Comparison Group

We also analyzed customers who enrolled in LIRA between July 1, 2019 and December 31, 2019 and who did not participate in LIRA in the two years preceding enrollment. We required that they received no LIRA discounts in the two years preceding enrollment to ensure that they were nonparticipants in both periods. These participants serve as a good comparison because they are low-income households who were eligible for the program and chose to participate. We used data for these participants for the two years preceding LIRA enrollment, to compare their change in payment behavior in the years prior to enrolling to the treatment group's change in payment behavior after enrolling. Because these customers did not participate in LIRA in either of the two analysis years, changes in bills and behavior should be related to factors that are exogenous to the program.

For the program impact analysis, we examined pre and post-treatment statistics. The difference between the pre and post-treatment statistics for the treatment group is considered the gross change. This is the actual change in behaviors and outcomes for those participants who were served by the program. Some of these changes may be due to the program, and some of these changes are due to other exogenous factors, but this is the customer's actual experience. The net change is the difference between the change for the treatment group and the change for the comparison groups, and represents the actual impact of the program, controlling for other exogenous changes.

Customers who participated in LIRA in the year prior to enrollment were excluded from the analysis, to allow for a comparison of data while not participating and while participating in LIRA. Customers who did not have a full year of data prior to joining the program or a full year of data following the program start date were not included in the impact analysis. The subject of data attrition is addressed more fully below.

The data that were used for the study and comparison group were as follows.

- Enrollee Treatment Group data extended from one year before the customer joined LIRA to one year after the customer enrolled or participated.
- Low-Income Nonparticipant Comparison Group data included one year of data before the mid-point of the third quarter of 2018 to one year of data after the mid-point of the fourth quarter of 2018.

- Later Participant Comparison Group data extended from two years before the customer joined LIRA to just before the customer enrolled in LIRA.

Table V-1 describes the treatment and comparison groups that are included in the analyses.

**Table V-1
Treatment and Comparison Groups**

	Enrollee Treatment Group	Nonparticipant Comparison Group	Later Participant Comparison Group
Group	Q3 and Q4 2018 LIRA Enrollees	2018 LIHEAP recipients	Q3 and Q4 2019 LIRA Enrollees
Enrollment Requirement	LIRA enrollment date between 7/1/2018 and 12/31/2018	Did not participate in LIRA in year prior to and year after quasi-enrollment.	LIRA enrollment date between 7/1/2019 and 12/31/2019
LIRA Participation Requirement	Did not participate in LIRA in the year prior to enrollment. Participated in LIRA for at least one month in the year after enrollment.		Did not participate in LIRA in the two years prior to enrollment
Pre-Participation Dates	1 year prior to enrollment	One year prior to the quasi-enrollment dates of 8/15/18 and 11/15/18.	2 years prior to enrollment
Post-Participation Dates	1 year after enrollment	One year after the quasi-enrollment dates of 8/15/18 and 11/15/18.	1 year prior to enrollment

In addition to the Treatment Group and the comparison groups, we analyzed program statistics for all customers who participated in LIRA for at least one month of 2019. The Treatment Group, described above, is a select group of customers who recently enrolled and did not participate in LIRA for at least a year before that enrollment. It is necessary to look at this subset of LIRA participants to understand how the program impacted affordability and payment behavior. However, looking at all 2019 LIRA participants provides a more comprehensive picture of the characteristics and benefits received by program participants. Therefore, both types of analyses are included in the following sections of the report.

B. Analysis

This section examines data attrition and results for the LIRA Analysis. The following information is summarized.

- Data Attrition
- LIRA Participation and Discounts
- Affordability Impacts
- Payment Impacts
- Arrearage Forgiveness
- Collections Impacts

Data Attrition

This section provides attrition statistics for all analysis groups included in this impact analysis.

Table V-2A provides the attrition analysis for the Enrollee Treatment Group. NFG customers who enrolled in LIRA between July 1, 2018 and December 31, 2018, did not participate in LIRA in the year prior to enrollment, and participated in LIRA for at least one month in the year after enrollment were considered for inclusion in the Enrollee Treatment Group. Many of these customers were considered ineligible for analysis because they moved into their home less than 300 days before enrollment or moved out of their home less than 300 days after enrollment. Eligible customers were excluded from the final analysis group because they did not have sufficient transactions data or because they were extreme outliers in billing and credit amounts. The table shows that 78 percent of eligible Enrollee Treatment Group customers were included in the final analysis group.

**Table V-2A
LIRA Impact Analysis Data Attrition
Enrollee Treatment Group**

Inclusion Reason	Enrollee Treatment Group
Included in LIRA Program Data	16,811
Enrolled in LIRA Between 7/1/2018 and 12/31/2018	1,562
Did Not Participate in LIRA in Pre-Period, per Program Data	1,321
Participated in LIRA in at Least One Month of Post-Period, per Program Data	1,308
Did Not Have LIRA Bills in Pre-Period, per Transactions Data	1,295
Participated in LIRA in at Least One Month of Post-Period, per Transactions Data	1,284
Moved In At Least 300 Days Before Enrollment	532
Moved Out At Least 300 Days After Enrollment	448
All Eligible	448
Had Transactions Data in Analysis Period	448
Had At Least 11 Months of Pre and Post Billing Data	409
Sufficient Data After Cleaning Transactions Data*	357
No Outliers	348
% of Eligible	78%

*Data were considered sufficient after cleaning transactions data if the account had at least 11 months of pre and post bills *or* at least 335 billing days in the pre and post billing period.

Table V-2B provides the attrition analysis for the All 2019 Participants Group. Customers who participated in LIRA for at least one month of 2019 were considered for inclusion in the All 2019 Participants Group. The table shows that 95 percent of these eligible customers were included in the final analysis group.

Table V-2B
LIRA Impact Analysis Data Attrition
All 2019 Participants

Inclusion Reason	All 2019 Participants
Included in LIRA Program Data	16,811
Participated in LIRA in at Least One Month of 2019, per Program Data	9,895
Participated in LIRA in at Least One Month of 2019, per Transactions Data	9,856
Moved In During or Before January 2019	8,988
Moved Out During or After December 2019	7,759
All Eligible	7,759
Had Transactions Data in Analysis Period	7,759
Had At Least 11 Months of 2019 Billing Data	7,755
Sufficient Data After Cleaning Transactions Data*	7,437
No Outliers	7,371
% of Eligible	95%

*Data were considered sufficient after cleaning transactions data if the account had at least 11 months of 2019 bills *or* at least 335 billing days in the billing period.

Table V-2C provides the attrition analysis for the Later Participant Comparison Group. Customers who enrolled in LIRA between July 1, 2019 and December 31, 2019 and who did not participate in LIRA in the two years preceding enrollment were considered for inclusion in the Later Participant Comparison Group. The table shows that many Later Participant Group customers were considered ineligible for analysis because they moved into their home less than 600 days before enrollment. Sixty-nine percent of eligible Later Participant Group customers were included in the final analysis group.

Table V-2C
LIRA Impact Analysis Data Attrition
Later Participant Comparison Group

Inclusion Reason	Later Participant Comparison Group
Included in LIRA Program Data	16,811
Enrolled in LIRA Between 7/1/2019 and 12/31/2019	1,499
Did Not Participate in LIRA in Pre- or Post-Period, per Program Data	1,254
Did Not Have LIRA Bills in Pre- or Post-Period, per Transactions Data	1,249
Moved In At Least 600 Days Before Enrollment	354
All Eligible	354
Had Transactions Data in Analysis Period	354
Had At Least 11 Months of Pre and Post Billing Data	296
Sufficient Data After Cleaning Transactions Data*	249

Inclusion Reason	Later Participant Comparison Group
No Outliers	246
% of Eligible	69%

*Data were considered sufficient after cleaning transactions data if the account had at least 11 months of pre and post bills *or* at least 335 billing days in the pre and post billing period.

The Nonparticipant Comparison Group for this analysis was a random sample of NFG customers who received LIHEAP in 2018 and did not participate in LIRA in the year prior to their quasi-enrollment date or the year after their quasi-enrollment date. These customers were replicated to represent customers who enrolled in LIRA in each quarter in the second half of 2018, to match the Treatment Group's enrollment dates. Table V-2D shows that 87 percent of eligible Q3 Nonparticipants and 92 percent of eligible Q4 Nonparticipants were included in the final analysis group.

Table V-2D
LIRA Impact Analysis Data Attrition
Nonparticipant Comparison Group

Inclusion Reason	Nonparticipant Comparison Group Quasi Enrollment Date	
	8/15/18	11/15/18
Received LIHEAP in 2018	2,000	2,000
Did Not Participate in LIRA in Pre- or Post-Period, per Program Data	2,000	2,000
Did Not Have LIRA Bills in Pre- or Post-Period, per Transactions Data	2,000	2,000
Moved In At Least 300 Days Before Enrollment	1,934	1,952
Moved Out At Least 300 Days After Enrollment	1,740	1,699
All Eligible	1,740	1,699
Had Transactions Data in Analysis Period	1,740	1,699
Had At Least 11 Months of Pre and Post Billing Data*	1,723	1,683
Sufficient Data After Cleaning Transactions Data	1,511	1,557
No Outliers	1,510	1,555
% of Eligible	87%	92%

*Data were considered sufficient after cleaning transactions data if the account had at least 11 months of pre and post bills *or* at least 335 billing days in the pre and post billing period.

Table V-3 compares the characteristics of All 2019 Participants, the Treatment Group, the Later Participant Comparison Group, and the Nonparticipant Comparison Group with those who had enough data to be included in the analyses that follow (labelled “Analysis Group”). In general, the “All” groups were very similar to the “Analysis Group,” providing some level of confidence that the impacts estimated below are attributable to the full population of program participants. The notable differences were as follows.

- Children: Later Participant Comparison Group members included in the Analysis Group were less likely to have children.
- Annual Income: Treatment Group members included in the Analysis Group were less likely to have income less than \$10,000 and more likely to have income between \$10,001 and \$20,000.
- Poverty Group: Those included in the Analysis Groups are less likely to be at or below 50 percent of the Federal Poverty Level (FPL). Treatment Group and Later Participant Group members included in the Analysis Groups were more likely to be between 101 and 150 percent of the FPL.

**Table V-3
Customer Characteristics Comparison**

	All 2019 LIRA Participants		Treatment Group		Later Participant Comparison Group		Nonparticipant Comparison Group	
	All	Analysis Group	All	Analysis Group	All	Analysis Group	All	Analysis Group
Observations	9,856	7,371	1,284	348	1,249	246	4,000	3,065
Senior (62+)	6%	6%	5%	5%	2%	2%	6%	6%
Children (≤18)	38%	36%	48%	46%	53%	43%	10%	8%
Annual Income								
≤ \$10,000	34%	31%	40%	32%	36%	32%	--	--
\$10,001-\$20,000	45%	47%	38%	44%	39%	39%	--	--
\$20,001-\$30,000	15%	16%	16%	16%	18%	21%	--	--
\$30,001-\$40,000	5%	5%	4%	6%	4%	7%	--	--
>\$40,000	1%	1%	1%	2%	1%	1%	--	--
Poverty Group								
≤ 50%	18%	13%	30%	24%	28%	22%	--	--
51% – 100%	47%	49%	42%	42%	44%	41%	--	--
101% – 150%	35%	38%	28%	34%	28%	37%	--	--
Income Sources								
Salary	32%	31%	39%	43%	39%	35%	--	--
Public Assistance	4%	3%	5%	3%	6%	3%	--	--

	All 2019 LIRA Participants		Treatment Group		Later Participant Comparison Group		Nonparticipant Comparison Group	
	All	Analysis Group	All	Analysis Group	All	Analysis Group	All	Analysis Group
Social Security	65%	70%	48%	51%	50%	54%	--	--
Unemployment	1%	1%	2%	2%	3%	4%	--	--
Pension	6%	6%	3%	5%	4%	9%	--	--
Child Support	7%	7%	9%	10%	9%	8%	--	--
Other Income	3%	3%	4%	5%	1%	2%	--	--
Gas Heat	>99%	100%	100%	100%	>99%	100%	>99%	>99%

Note: A large percentage of nonparticipants had missing income data and were excluded from any rows for which income data were needed.

LIRA Participation and Discounts

This section provides statistics on LIRA participation and discounts for the All 2019 Participants Group and the Enrollee Treatment Group.

Table V-4 examines the percent of customers who participated in LIRA for the full year. Customers in the Enrollee Treatment Group were considered full year participants if they were actively enrolled in LIRA for the full year after enrollment, according to the customer data. Customers in the All 2019 Participants Group were considered full year participants if they were actively enrolled in LIRA for all of 2019. The table shows that 69 percent of the 2019 participants and 71 percent of the Treatment Group were full year participants.

**Table V-4
Full Year LIRA Participation**

	All 2019 Participants		Treatment Group	
	#	%	#	%
Final Analysis Group	7,371	100%	348	100%
Full Year in LIRA	5,114	69%	246	71%
Not Full Year in LIRA	2,257	31%	102	29%

Table V-5 displays the mean number of LIRA bills and the mean and median LIRA discount amount. The LIRA discount is the difference between the full bill and the LIRA asked to pay amount. The table shows that full year 2019 participants received an average of 11.8 LIRA bills and an average discount of \$152. Full year Treatment Group customers received an average of 10.8 LIRA bills and an average discount of \$166.

The post-enrollment period for Treatment Group customers began on the enrollment date. On average, the first LIRA bill in the Transactions Data was received 51 days after the

enrollment date²¹. Ninety-six percent of the Treatment Group customers did not have a LIRA bill in the Transactions Data in the 30 days after their enrollment date, and seven percent did not have a LIRA bill in the 60 days after their enrollment date. If the non-LIRA bills in the 60 days after enrollment were counted as LIRA bills, the mean number of LIRA bills in the year after enrollment would be 11.3 for all Treatment Group customers and 12.4 for full year Treatment Group customers.

Table V-5
LIRA Discount Received

	All 2019 Participants				Treatment Group			
	Discount in 2019				Discount in Year after Enrollment			
	Obs.	Mean # LIRA Bills	Mean LIRA Discount	Median LIRA Discount	Obs.	Mean # LIRA Bills	Mean LIRA Discount	Median LIRA Discount
All	7,371	10.2	\$137	\$92	348	9.6	\$191	\$107
Full Year LIRA	5,114	11.8	\$152	\$101	246	10.8	\$166	\$104

Table V-6 displays the number and percent of participants that received minimum bills by poverty level group. Customers in the Enrollee Treatment Group were considered minimum bill customers if they had at least one bill that was \$12 in the post-period. Customers in the All 2019 Participants Group were considered minimum bill customers if they had at least one bill that was \$12 in 2019. The table shows that three percent of the 2019 participants and five percent of Treatment Group participants received minimum bills. Customers at or below 50 percent FPL were more likely to receive minimum bills than those at higher poverty levels.

Table V-6
LIRA Participants with the Minimum Bill

Poverty Level	All 2019 Participants			Treatment Group		
	# of Participants	Min Bill		# of Participants	Min Bill	
		#	%		#	%
≤ 50%	928	129	14%	82	9	11%
51% – 100%	3,629	71	2%	147	6	4%
101% – 150%	2,814	40	1%	119	1	1%
All	7,371	240	3%	348	16	5%

Table V-7 displays the distribution of the percent discount received on the NFG bill, by full year participation. The discount percent is the amount of the LIRA discount for 2019

²¹ LIRA bills were defined as the “Invoice Document” transactions with an On CAP variable value of “YES”. NFG reported that they changed their process so that credits are now applied to participants’ first bill following LIRA enrollment.

divided by the full bill for the All 2019 Participants. The discount percent for the Treatment Group is the LIRA discount in the year after enrollment divided by the full LIRA bill in the year after enrollment.

The table shows that the 2019 participants who participated in LIRA for a full year received an average discount of 17 percent and full year Treatment Group participants received an average discount of 16 percent. Four percent of the 2019 full year participants and eight percent of the full year treatment group participants received a discount of fifty percent or more.

Table V-7
Distribution of LIRA Discount on NFG Bill by Full Year LIRA Participation

Percent Discount	All 2019 Participants		Treatment Group	
	Full Year	Not Full Year	Full Year	Not Full Year
<10%	12%	71%	64%	47%
10%-19%	60%	16%	17%	11%
20%-29%	16%	6%	6%	16%
30%-49%	8%	5%	6%	14%
50%-74%	3%	2%	7%	11%
≥75%	1%	<1%	1%	2%
Total	100%	100%	100%	100%
Mean	17%	10%	16%	22%

Table V-8 shows that customers in the lowest poverty level group received a higher percent discount on average than customers in higher poverty level groups. The 2019 participants at or below 50 percent of the poverty level received an average discount of 33 percent, and Treatment Group customers at or below 50 percent FPL received an average discount of 37 percent.

Table V-8
Mean Percent Discount on NFG Bill by Poverty Level

Poverty Level	All 2019 Participants		Treatment Group	
	Observations	% Discount	Observations	% Discount
≤ 50%	928	33%	82	37%
51%-100%	3,629	15%	147	13%
101%-150%	2,814	9%	119	10%
All	7,371	15%	348	18%

Table V-9 displays the distribution of the LIRA discount by poverty level. The table shows that the lower poverty level groups have higher discount levels. Twenty-three percent of the 2019 participants at or below 50 percent FPL had a discount of 50 percent or more, compared to less than two percent of customers between 51 and 100 of poverty and less than one percent of customers between 101 and 150 percent of poverty.

Table V-9
Distribution of LIRA Discount on Bill by Poverty Level

Percent Discount	All 2019 Participants				Treatment Group			
	Poverty Level				Poverty Level			
	≤ 50%	51%-100%	101%-150%	Total	≤ 50%	51%-100%	101%-150%	Total
Obs.	928	3,629	2,814	7,371	82	147	119	348
<10%	15%	27%	39%	30%	18%	61%	85%	59%
10%-19%	22%	43%	59%	46%	10%	22%	9%	15%
20%-29%	14%	22%	1%	13%	16%	11%	2%	9%
30%-49%	27%	7%	1%	7%	22%	5%	3%	8%
50%-74%	19%	1%	<1%	3%	29%	1%	1%	8%
≥75%	4%	<1%	0%	1%	5%	0%	0%	1%
Total	100%	100%	100%	100%	100%	100%	100%	100%

Affordability Impacts

This section examines LIRA's impact on affordability.

Table V-10 summarizes the affordability impacts of LIRA. The table shows that the Treatment Group and the comparison groups had full bill amounts that were approximately the same in the pre- and post-enrollment periods. Treatment Group customers received an average LIRA discount of \$191, which reduced their mean energy burden from 16 percent to 14 percent. The Later Participant Comparison Group had an average energy burden of 18 percent. When accounting for this energy burden reduction in the Comparison Group, the net reduction in energy burden for the Treatment Group was two percentage points.

Table V-10
Affordability Impacts

	Treatment Group			Comparison Group								Average Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	348			246				3,065				
Full Bill	\$1,066	\$1,049	-\$17	\$1,034	\$1,035	\$1	-\$17	\$895	\$868	-\$27**	\$10	-\$4
LIRA Discount	\$0	\$191	\$191**	\$0	\$0	\$0	-\$191**	\$0	\$0	\$0	-\$191**	-\$191
Discounted Bill	\$1,066	\$858	-\$208**	\$1,034	\$1,035	\$1	-\$208**	\$895	\$868	-\$27**	-\$181**	-\$195
Energy Burden	16%	14%	-2% **	18%	18%	< -1%	-2% **	--	--	--	--	-2%

Note: A large percentage of nonparticipants had missing income data and were excluded from any rows for which income data were needed.

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

The Pennsylvania Public Utility Commission (PUC) has specified target energy burden levels for customers who participate in Customer Assistance Programs (CAP). Table V-11A shows that a large percentage of NFG customers still had an energy burden above the PUC target after enrolling in LIRA, especially those with income at or below 50 percent of the poverty level. Treatment Group customers in all poverty level groups (except for those with zero income) did experience a reduction in energy burden after enrolling in LIRA. The percent of Treatment Group customers at or below 50 percent FPL with energy burden above the PUC target decreased from 84 percent in the year prior to enrollment to 54 percent in the year after enrollment.

Table V-11A
Gas Burden and Relationship to PUC Target
Treatment Group and All 2019 Participants

Poverty Level	All 2019 Participants		
	Mean Energy Burden	PUC Energy Burden Target	Percent with Burden Above PUC Target
	2019		2019
\$0 Income	100%	5% - 8%	100%
≤ 50%	17%	5% - 8%	44%
51% – 100%	7%	7% - 10%	8%
101% – 150%	4%	9% - 10%	1%

Poverty Level	Treatment Group				
	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	5% - 8%	100%	100%
≤ 50%	36%	30%	5% - 8%	84%	54%
51% – 100%	8%	6%	7% - 10%	20%	7%
101% – 150%	5%	5%	9% - 10%	3%	2%

Note: Customers were considered to be above the PUC burden targets if their energy burden was above by 0.5% or more.

Table V-11B displays the amount by which customers exceeded their targeted energy burdens, by poverty level group. The table shows that the 2019 participants exceed the energy burden target by \$448 on average.

Table V-11B
Dollar Amount above PUC Gas Burden Targets
Treatment Group and All 2019 Participants
Customers Who Exceeded Gas Burden Targets

\$ Amount Above PUC Target Burden	All 2019 Participants					Treatment Group				
	Poverty Level					Poverty Level				
	\$0 Income	≤ 50%	51%-100%	101%-150%	Total	\$0 Income	≤ 50%	51%-100%	101%-150%	Total
Obs.	152	341	290	30	813	15	36	10	2	63
\$1 - \$100	0%	6%	20%	7%	10%	0%	6%	20%	0%	6%
\$101 - \$200	4%	18%	26%	37%	19%	7%	6%	40%	0%	11%
\$201 - \$500	22%	40%	40%	37%	36%	13%	58%	30%	100%	44%
\$501 - \$1,000	50%	29%	11%	17%	26%	33%	22%	10%	0%	22%
>\$1,000	24%	6%	3%	3%	8%	47%	8%	0%	0%	16%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Mean	\$796	\$435	\$293	\$334	\$448	\$857	\$479	\$219	\$380	\$525

Table V-11C shows that the percent of full year participants with burdens exceeding the target was lower than all participants. While 23 percent of 2019 full year participants below 50 percent of the poverty level exceeded the energy burden target, one percent of those with income between 101 and 150 percent of the poverty level exceeded the energy burden target. The percentage of the Treatment Group that exceeded the target is greater because most did not begin receiving the discount until one or two months following enrollment.

**Table V-11C
Gas Burden and Relationship to PUC Target
Treatment Group and All 2019 Participants
with Full Year LIRA Participation**

Poverty Level	All 2019 Participants				
	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	2019			2019	
\$0 Income	100%		5% - 8%	100%	
≤ 50%	10%		5% - 8%	23%	
51% – 100%	6%		7% - 10%	5%	
101% – 150%	4%		9% - 10%	1%	
Poverty Level	Treatment Group				
	Mean Energy Burden		PUC Energy Burden Target	Percent with Burden Above PUC Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	5% - 8%	100%	100%
≤ 50%	18%	12%	5% - 8%	78%	30%
51% – 100%	7%	7%	7% - 10%	19%	7%
101% – 150%	5%	5%	9% - 10%	3%	2%

Note: Customers were considered to be above the PUC burden targets if their energy burden was above by 0.5% or more.

There were 101 full year 2019 LIRA participants with income below 50 percent of the poverty level who had an energy burden above the PUC target. The full year 2019 participants may not have achieved the targeted energy burden because the NFG discounts were designed to meet the targets on average and may not meet them for every customer. Additionally, if energy usage increases due to weather, changes in the household, or other factors, the customer's burden may increase above the target level. The analysis showed that if customers received the full discount according to the program data, 68 of those 101 customers at or below 50 percent of the poverty level still would have had an energy burden above the PUC target.

The participants also may not have achieved the target burden if the calculated LIRA bill discount based on transactions data was less than the program designed discount due to changes in the discount at the time of recertification or budget billing adjustments to the customer's bill.

Table V-11D examines the 101 full year 2019 participants with income at or below 50 percent of poverty who had a burden above the PUC target burden. The table shows that on average, the discount based on the billing data was less than the discount in the customer data. For example, of the 22 participants with a program discount of 80 percent in the customer data, the mean discount received according to the billing data was 56 percent.

Twenty-five percent had a discount in the billing data calculated to be between 78 and 80 percent.

Table V-11D
Full Year 2019 LIRA Participants with Income \leq 50% FPL
With an Energy Burden above the PUC Target

LIRA Program Discount	2019 Full Year LIRA Participants Income \leq 50% & Above PUC Target Burden						
	Number of Households	Calculated Discount in 2019					Max
		Mean	Min	Percentile			
				25	50	75	
10%	7	16%	10%	10%	16%	23%	25%
20%	6	20%	8%	10%	23%	27%	28%
30%	14	29%	10%	17%	33%	37%	40%
40%	11	33%	10%	16%	40%	43%	48%
50%	12	36%	9%	23%	38%	48%	63%
60%	15	34%	8%	19%	40%	47%	59%
70%	14	46%	23%	34%	40%	62%	74%
80%	22	56%	10%	41%	64%	78%	80%
Total	101	38%	8%	23%	37%	48%	80%

NFG developed targeted energy burden levels for customers who participate in LIRA. Table V-12A shows that 55 percent of the 2019 participants below 50 percent of the poverty level exceeded the NFG burden target. While 93 percent of the Treatment Group exceeded the NFG target in the year prior to enrollment, 66 percent exceeded the target in the year following enrollment.

Table V-12A
Gas Burden and Relationship to NFG Target
Treatment Group and All 2019 Participants

Poverty Level	All 2019 Participants		
	Mean Energy Burden	NFG Energy Burden Target	Percent with Burden Above NFG Target
	2019		2019
\$0 Income	100%	6.5%	100%
\leq 50%	17%	6.5%	55%
51% – 100%	7%	8.0%	20%
101% – 150%	4%	9.0%	2%

Poverty Level	Treatment Group				
	Mean Energy Burden		NFG Energy Burden Target	Percent with Burden Above NFG Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	6.5%	100%	100%
≤ 50%	36%	30%	6.5%	93%	66%
51% – 100%	8%	6%	8.0%	37%	19%
101% – 150%	5%	5%	9.0%	4%	3%

Note: Customers were considered to be above the NFG burden targets if their energy burden was above by 0.5% or more.

Table V-12B displays the dollar amount by which customers exceeded the NFG energy burden targets. The table shows that the 2019 participants exceeded the target by \$396 on average.

Table V-12B
Dollar Amount above NFG Gas Burden Targets
Treatment Group and All 2019 Participants
Customers Who Exceeded Gas Burden Targets

\$ Amount Above PUC Target Burden	All 2019 Participants					Treatment Group				
	Poverty Level					Poverty Level				
	\$0 Income	≤ 50%	51%-100%	101%-150%	Total	\$0 Income	≤ 50%	51%-100%	101%-150%	Total
Obs.	152	426	709	46	1,333	15	44	28	3	90
\$1 - \$100	0%	11%	19%	9%	14%	0%	14%	18%	0%	12%
\$101 - \$200	4%	14%	30%	22%	22%	7%	7%	39%	33%	18%
\$201 - \$500	22%	39%	36%	46%	36%	13%	45%	32%	33%	36%
\$501 - \$1,000	50%	30%	13%	22%	23%	33%	27%	11%	33%	23%
>\$1,000	24%	7%	2%	2%	6%	47%	7%	0%	0%	11%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Mean	\$796	\$441	\$285	\$369	\$396	\$857	\$459	\$252	\$423	\$459

Table V-12C shows that fewer full year LIRA participants had a burden that exceeded the NFG target. While 36 percent of the 2019 participants with income at or below 50 percent of the poverty level exceeded the target, one percent of those with income between 101 and 150 percent of the poverty level exceeded the target.

**Table V-12C
Gas Burden and Relationship to NFG Target
Treatment Group and All 2019 Participants
with Full Year LIRA Participation**

Poverty Level	All 2019 Participants				
	Mean Energy Burden		NFG Energy Burden Target	Percent with Burden Above NFG Target	
	2019			2019	
\$0 Income	100%		6.5%	100%	
≤ 50%	10%		6.5%	36%	
51% – 100%	6%		8.0%	16%	
101% – 150%	4%		9.0%	1%	
Poverty Level	Treatment Group				
	Mean Energy Burden		NFG Energy Burden Target	Percent with Burden Above NFG Target	
	Pre	Post		Pre	Post
\$0 Income	100%	100%	6.5%	100%	100%
≤ 50%	18%	12%	6.5%	92%	46%
51% – 100%	7%	7%	8.0%	37%	21%
101% – 150%	5%	5%	9.0%	5%	3%

Note: Customers were considered to be above the NFG burden targets if their energy burden was above by 0.5% or more.

Payment Impacts

This section examines the impact of LIRA participation on payment compliance.

Table V-13 displays the following positive payment impacts for the LIRA participants in the year following their enrollment.

- The total number of cash payments increased significantly from 5.9 payments in the pre-period to 7.2 payments in the post-period. This represented an increase of 2.1 payments compared to the comparison groups.
- The total amount of credits increased by \$179 in the year following program enrollment. The decline in cash payments and LIHEAP crisis credits was more than offset by the increase in LIRA discounts.
- The total coverage rate (percent of the bill covered by cash and assistance payments) increased for LIRA participants from 93 percent in the year prior to enrollment to 114 percent in the year following enrollment. Both comparison groups had a reduction in their coverage rates, so the net change in the total coverage rate was an increase of 28 percentage points.
- LIRA participants' balances declined by \$201 as compared to the comparison groups.

**Table V-13
Payment Impacts**

	Treatment Group			Comparison Groups								Mean Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
# of Customers	348			246				3,065				
Gas Charges	\$949	\$925	-\$24*	\$926	\$912	-\$14	-\$20	\$854	\$826	-\$27**	\$4	-\$8
Other Charges [†]	\$117	\$124	\$7	\$109	\$123	\$15	-\$7	\$41	\$42	\$1	\$7	\$0
Total Charges	\$1,066	\$1,049	-\$17	\$1,034	\$1,035	\$1	-\$17	\$895	\$868	-\$27**	\$10	-\$4
Cash Payments	\$632	\$569	-\$63**	\$794	\$647	-\$147**	\$84*	\$637	\$629	-\$8#	-\$56**	\$14
LIRA Discount	\$0	\$191	\$191**	\$0	\$0	\$0	\$191**	\$0	\$0	\$0	\$191**	\$191
LIHEAP Credits	\$154	\$165	\$11	\$110	\$135	\$25*	-\$14	\$239	\$189	-\$49**	\$60**	\$23
N4N Credits	\$4	\$2	-\$2	\$4	\$2	-\$3	< \$1	< \$1	< \$1	< -\$1#	-\$2**	-\$2
LIHEAP Crisis	\$68	\$23	-\$45**	\$45	\$67	\$22*	-\$67**	\$11	\$12	1	-\$46**	-\$57
Other Credits	\$13	\$17	\$3	\$14	\$5	-\$10*	\$13#	\$3	\$4	\$1*	\$2	\$8
Total Credits	\$872	\$967	\$95**	\$967	\$855	-\$112**	\$207**	\$890	\$834	-\$55**	\$150**	\$179
# Cash Payments	5.9	7.2	1.4**	7.0	5.6	-1.3**	2.7**	8.0	7.9	-0.1	1.4**	2.1
Cash Coverage Rate	67%	75%	9%**	85%	69%	-16%**	25%**	71%	72%	1%#	8%**	17%
Total Coverage Rate	93%	114%	20%**	105%	93%	-12%**	32%**	104%	100%	-4%**	24%**	28%
Shortfall	\$194	\$83	-\$111**	\$67	\$180	\$113**	-\$224**	\$5	\$34	\$29**	-\$140**	-\$182
Arrears Forgiveness	\$0	\$130	\$130**	\$0	\$0	\$0	\$130**	\$0	\$0	\$0	\$130**	\$130
Beginning Balance	\$170	\$291	\$120**	\$144	\$199	\$55**	\$66**	-\$14	-\$52	-\$38**	\$158**	\$112
Ending Balance	\$364	\$243	-\$122**	\$212	\$379	\$167**	-\$289	-\$9	-\$18	-\$9**	-\$112**	-\$201

**Denotes significance at the 99 percent level. * Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

† The “Other Charges” category includes late payment charges, account maintenance charges, automatic clearing, doubtful postings, general document charges, return charges, positive miscellaneous posts, positive BBP amounts, and positive transfer postings.

Table V-14 displays the distribution of the total bill coverage rate. The percent of Treatment Group customers who paid 90 percent or more of their bill increased from 59 percent in the year prior to LIRA enrollment to 81 percent in the year following LIRA enrollment.

Table V-14
Analysis of Total Bill Coverage Rates

Coverage Rate	Treatment Group		Comparison Group				All 2019 Participants
			Later Participants		Nonparticipants		
	Pre	Post	Pre	Post	Pre	Post	2019
Observations	348		246		3,065		7,371
≥ 100%	43%	56%	68%	45%	77%	51%	62%
90%-99%	16%	25%	11%	11%	11%	27%	15%
80%-89%	14%	10%	9%	14%	5%	13%	8%
< 80%	27%	8%	13%	29%	7%	9%	15%
Total	100%	100%	100%	100%	100%	100%	100%
Mean Rate	93%	114%	105%	93%	104%	100%	104%

Table V-15 displays the total bill coverage rates in the pre- and post-period for the full year 2019 participants and Treatment Group customers. The table shows that the percent of full year 2019 participants who paid 90 percent or more of their bill in 2019 was approximately 84 percent. The percent of full year Treatment Group customers who paid 90 percent or more of their bill in the year after enrollment was approximately 86 percent.

Table V-15
Analysis of Total Bill Coverage Rates
Treatment Group and All 2019 Participants with Full-Year LIRA Participation

Coverage Rate	Full Year Participants					
	All 2019 Participants		Treatment Group			
	2019		Pre		Post	
	#	%	#	%	#	%
≥ 100%	3,498	68%	115	47%	145	59%
90%-99%	820	16%	43	17%	67	27%
80%-89%	329	6%	28	11%	22	9%
< 80%	467	9%	60	24%	12	5%
Total	5,114	100%	246	100%	246	100%
Mean Coverage Rate	106%		95%		109%	

Table V-16 displays the percent of customers who received LIHEAP in the pre- and post-enrollment periods. The table shows that 55 percent of Treatment Group customers received LIHEAP in the pre-period, compared to 58 percent in the post-period. This is a positive finding, as research on other CAP programs found that CAP participants were less likely to receive LIHEAP following CAP enrollment.

Table V-16
LIHEAP Receipt

LIHEAP Receipt	Treatment Group			Comparison Group								Mean Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	348			246				3,065				
Percent Received LIHEAP	55%	58%	3%	41%	49%	9%#	-6%	90%	74%	-16%**	19%**	7%
Mean LIHEAP Grant – All	\$154	\$165	\$11	\$110	\$135	\$25*	-\$14	\$239	\$189	-\$49**	\$60**	\$23
Mean LIHEAP Grant – Received in Pre or Post	\$209	\$223	\$15	\$185	\$227	\$42*	-\$27	\$241	\$191	-\$50**	\$65**	\$18

*Denotes significance at the 99 percent level. **Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Arrearage Forgiveness

This section examines the arrearage forgiveness that the LIRA participants received.

Customers in the Enrollee Treatment Group with a positive frozen arrearage on their first LIRA bill in the year following enrollment were classified as having arrears. Customers in the All 2019 Participants Group with a positive frozen arrearage amount on their first LIRA bill in 2019 were classified as having arrears.

Table V-17 shows that 90 percent of the 2019 participants with arrears received arrearage forgiveness averaging \$157 and 92 percent of the full year 2019 participants with arrears received forgiveness averaging \$203. The table also shows that 99 percent of Treatment Group customers with arrears received arrearage forgiveness averaging \$192.

Table V-17
Arrearage Forgiveness Received
All 2019 LIRA Participants and Treatment Group

	Obs.	% Received Arrearage Forgiveness	Mean # Arrearage Forgiveness Payments	\$ Forgiven		Arrears	
				Mean	Median	Initial Amount	Final Amount
	Forgiveness Received in 2019				2019		
All 2019 Participants	7,371	30%	1.9	\$52	\$0	\$135	\$83
2019 Participants with Arrears	2,348	90%	5.9	\$157	\$97	\$440	\$283
2019 Full Year on LIRA	5,114	20%	1.7	\$43	\$0	\$67	\$24
2019 Full Year on LIRA with Arrears	1,059	92%	7.9	\$203	\$134	\$348	\$146

	Obs.	% Received Arrearage Forgiveness	Mean # Arrearage Forgiveness Payments	\$ Forgiven		Arrearages	
				Mean	Median	Initial Amount	Final Amount
	Forgiveness Received in Year after Enrollment					Year After Enroll	
Treatment Group	348	68%	5.3	\$130	\$81	\$358	\$228
Treatment Group with Arrears	233	99%	7.7	\$192	\$130	\$541	\$350
Treatment Group – Full Year on LIRA	246	64%	5.8	\$133	\$88	\$304	\$171
Treatment Group – Full Year with Arrears	152	100%	9.1	\$211	\$144	\$503	\$291

Collections Impacts

This section examines the impacts of LIRA participation on collections actions and costs.

Table V-18A shows the number of collections actions that customers experienced in the pre- and post-periods. The table shows that Treatment Group customers experienced a significant reduction in the number of collection calls, field visits, and notices. However, the decrease in collection calls was offset by a significant increase in the number of LIRA calls. The table shows that the total number of collection actions remained virtually the same in the pre- and post-enrollment period.

Table V-18A
Collection Impacts – Number of Actions

	Treatment Group			Comparison Group								Mean Net Change
	Pre	Post	Change	Later Participants				Nonparticipants				
				Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	348			246				3,065				
Call	7.0	4.2	-2.8**	7.0	7.3	0.4	-3.2**	1.3	1.0	-0.4**	-2.5**	-2.9
LIRA Calls	0.0	3.0	3.0**	0.0	0.0	0.0	3.0**	0.0	0.0	0.0	3.0**	3
Collections Agency	< 0.1	0.0	< -0.1	0.0	0.0	0.0	< -0.1	0.0	0.0	0.0	< -0.1**	< -0.1
Field Visit	0.3	0.2	-0.2**	0.4	0.2	-0.2**	< 0.1	0.1	< 0.1	< -0.1**	-0.1**	< -0.1
Notice	2.6	2.3	-0.3*	2.4	2.7	0.3**	-0.6**	0.5	0.4	-0.1**	-0.1**	-0.4
Disconnection Ordered	0.2	0.3	0.1*	0.2	0.4	0.2**	-0.1#	0.1	< 0.1	- < 0.1	0.1**	0
Disconnection Completed	0.1	0.1	< 0.1	0.1	0.1	< 0.1	< -0.1	< 0.1	< 0.1	< 0.1	< 0.1*	0
Other	< 0.1	< 0.1	0.0	< 0.1	0.0	< -0.1	< 0.1	< 0.1	< 0.1	< -0.1	< 0.1	< 0.1
Total Actions	10.2	10.0	-0.1	10.0	10.7	0.7	-0.8	1.9	1.4	-0.5**	0.4	-0.2

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table V-18B shows the percent of NFG customers who were disconnected in the pre- and post-period. The percent of Treatment Group disconnections increased following enrollment

from seven percent to nine percent, but this change was not statistically significant. The net change in the percent of customers disconnected was zero percent.

Table V-18B
Collection Impacts – Percent of Customers Disconnected

	Treatment Group			Comparison Group								Mean Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	348			246				3,065				
Disconnection Completed	7%	9%	1%	5%	8%	3%	-1%	1%	1%	< 1%	1%	0%

Table V-19 displays the average collection costs. The costs for the collection actions shown in the table below are as follows.

- Collection calls - \$1.02
- LIRA calls - \$1.02
- Field visits - \$8.15
- Notices (not including 1st 30 days tenant termination notice) - \$0.52
- Notices (only including 1st 30 days tenant termination notice) - \$8.15
- Completed disconnections - \$12.32

The average total collection costs for the Treatment Group declined by less than one dollar as compared to the comparison groups.

Table V-19
Collection Impacts – Cost of Actions

	Treatment Group			Comparison Group								Mean Net Change
				Later Participants				Nonparticipants				
	Pre	Post	Change	Pre	Post	Change	Net Change	Pre	Post	Change	Net Change	
Observations	348			246				3,065				
Call	\$7	\$4	-\$3**	\$7	\$7	< \$1	-\$3**	\$1	\$1	< -\$1**	-\$3**	-\$3
LIRA Calls	\$0	\$3	\$3**	\$0	\$0	\$0	\$3**	\$0	\$0	\$0	\$3**	\$3
Field Visit	\$3	\$1	-\$1**	\$3	\$2	-\$1**	< \$1	< \$1	< \$1	< -\$1**	-\$1*	< -\$1
Notice	\$1	\$1	< -\$1*	\$1	\$1	< \$1**	< -\$1**	< \$1	< \$1	< -\$1**	< -\$1	< -\$1
Disconnection Completed	\$1	\$1	< \$1	\$1	\$1	< \$1	< -\$1	< \$1	< \$1	< \$1	< \$1*	< \$1
Total Cost	\$12	\$11	-\$1	\$12	\$11	-\$1	< -\$1	\$2	\$2	-\$1**	< -\$1	< -\$1

**Denotes significance at the 99 percent level. *Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

C. Summary

This section provides a summary of the key findings from the LIRA impact analysis.

- Participation Continuity: 69 percent of the 2019 participants and 71 percent of the new enrollees participated in LIRA for a full year.
- LIRA Discount: The full year 2019 participants received a mean LIRA discount of \$152, which was a 17 percent discount on their bill.
- Minimum Bill: 14 percent of the 2019 participants below 50 percent of the poverty level received the minimum bill and three percent of all 2019 participants received the minimum bill.
- Affordability Impacts: The new enrollees received an average discount of \$191 and reduced their mean energy burden from 16 percent to 14 percent in the year following enrollment.
- PUC Energy Burden Target: 23 percent of the 2019 participants with income below 50 percent of the poverty level had an energy burden above the PUC target.
- Payment Impacts: LIRA had a positive impact on participants' payment impacts following enrollment.
 - LIRA participants increased their total number of cash payments from 5.9 payments in the year preceding LIRA enrollment to 7.2 payments in the post-period.
 - LIRA participants increased their total credits by \$179 in the year following program enrollment, as compared to the comparison groups.
 - The total coverage rate (percent of the bill covered by cash and assistance payments) increased for LIRA participants from 93 percent in the year prior to enrollment to 114 percent in the year following enrollment.
 - LIRA participants' balance declined by \$201 as compared to the comparison groups.
- LIHEAP Receipt: 55 percent of Treatment Group customers received LIHEAP in the year prior to LIRA enrollment, compared to 58 percent in the year following enrollment. This is a positive finding, as research on other CAP programs found that CAP participants were less likely to receive LIHEAP following CAP enrollment.
- Arrearage Forgiveness: 90 percent of the 2019 participants with arrears received arrearage forgiveness averaging \$157.
- Collections Impact: New LIRA enrollees experienced a significant reduction in the number of collection calls, field visits, and notices in the year following enrollment. However, the decrease in collection calls was offset by a significant increase in the

number of LIRA calls. As a result, the total number of collections actions was unchanged.

VI. Findings and Recommendations

This section provides a summary of findings and recommendations from the NFG Universal Service Program Evaluation.

A. LIRA

The evaluation found that the LIRA Program provides significant benefits to participants, which results in improved affordability, improved bill payment, and reduced arrearages. Participants were highly satisfied with the program and reported that it was very important in helping them to meeting their needs. We provide the following recommendations to improve the program.

1. *Reassess Discounts for LIRA Participants with Income Below 50 Percent of the Poverty Level*

Twenty-three percent of full year 2019 LIRA participants with income at or below 50 percent of the poverty level (excluding \$0 income customers) had an energy burden above the PUC target of eight percent. Reassess the discount calculation for these customers to provide greater affordability for the lowest poverty level group.

2. *Improve LIRA Application Instructions*

Dival reported that 35 to 50 percent of applications do not include complete financial documentation. They may include less than the month of income documentation required or exclude information on child support or public assistance. According to Dival, the financial documentation requirements are not listed clearly on the application. They stated that the requirements for the financial documentation are listed “in small writing” at the bottom of the frontside of the application.

3. *Provide a LIRA Electronic Application Submission Option*

Dival reported that customers frequently call to request an extension on their ten-day deadline to submit their application or follow-up information. Many customers expressed interest in submitting their applications via email, and were wary of mailing their application because of a concern that it may be lost in transit or not reach Dival before the submission deadline.

Electronic submission would allow customers to submit applications and follow-up information instantaneously, which would give them more time to fill out the application and gather the required information.

If NFG offered an online application, Dival suggested that the application could include programmed checks that prevent customers from skipping parts of the application. Dival reported that on the paper application, customers may forget to sign the application, fail to provide social security numbers, or forget to fill out the back side of the application.

4. *Provide Dival the Ability to Directly Transfer Customers to NFG Customer Service*

Dival is only permitted to answer customer questions that are related to the LIRA program. They estimated that 30 percent of their calls are non-LIRA related. They provide these customers with NFG's 1-800 number, but they reported that customers are angry that they are unable to be transferred to NFG directly.

5. *Prevent the Reverification Date from Scheduling on a Weekend or Holiday*

When processing zero-income applications and reverifications, Dival staff are required to manually determine and enter the next reverification date into the system. The system will not generate reverification packets for customers if their reverification date is a weekend or a holiday, but it does not notify Dival if the date they have selected is a weekend or holiday. It would be helpful if the system automatically calculated a future reverification date for zero-income customers and/or checked if the entered reverification date was a weekend or holiday.

6. *Educate Customers about LIHEAP Benefits*

Dival reported that many customers have trouble differentiating between the various assistance programs they receive. The education call script used by Dival only briefly mentions LIHEAP. During the education call, customers are currently only told that they should apply for the program when it is open and to contact their local assistance office if they want more information.

B. LIURP

LIURP provides important services, successfully targets high gas users, and achieves high energy savings for program participants. We have the following recommendations to improve the program.

1. *Provide Increased Training, Communication, and Guidance to Service Delivery Organizations*

A LIURP organization reported that the overall communication and guidance from NFG about the program is lacking. The representative reported that NFG has never offered training opportunities or subsidized the cost of new equipment and does not provide many opportunities for agencies to provide feedback.

2. *Improve LIURP Outreach*

LIURP organizations reported that they serve a small percentage of referred customers because the customers are not interested or aware of LIURP when called. NFG has begun calling customers to increase understanding of the program. NFG should assess whether the calls result in improved participation rates.

3. *NFG Identification*

A LIURP organization reported that it would be useful to have NFG shirts to provide greater customer acceptance when they visit the home.

4. *Provide Customer Email Addresses to Service Delivery Organizations*

A LIURP organization reported that it would be helpful to have an additional method to contact customers.

5. *Require Blower Door Testing to Determine Air Sealing Opportunities*

One LIURP organization reported that this was not required and would help to assess opportunities for air sealing.

C. Neighbor for Neighbor Heat Fund

The Neighbor for Neighbor Heat Fund provides important assistance to customers who are behind in their NFG bills and on other fuel bills. Recommendations to improve the program are provided below.

1. *Provide LIRA Training to Neighbor for Neighbor Agencies*

One agency reported that they are not very familiar with LIRA, so they only refer customers to this program once in a while. They requested additional information about LIRA so that they can more confidently provide their customers with referrals to the program.

2. *Create an Online System for Submission and Tracking*

One agency reported that applications are sent via U.S. mail which results in increased application processing time and some applications getting lost or missed. The delay also makes it difficult to provide current information to applicants who call about their grants. An online system would improve processing time and information.

D. CARES

There were no CARES recommendations.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Universal Service and Energy Conservation :
Plan (USECP) Filing Schedule and : M-2019-3012601
Independent Evaluation Filing Schedule :

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email:

John R. Evans
Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
jorevans@pa.gov

Tanya McCloskey
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
tmccloskey@paoca.org

Elizabeth R. Marx, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Richard Kanaskie
Director
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
rkanaskie@pa.gov

Danielle Jouenne
UGI Utilities Inc. – Electric and Gas
Divisions
460 Gulph Road
King of Prussia, PA 19406
daniellejouenne@ugicorp.com

Jennedy S. Johnson
Assistant General Counsel
PECO
2301 Market Street / S23-1
Philadelphia, PA 19103
jennedy.johnson@exeloncorp.com

Date: September 2, 2020


Tanya C. Leshko