



August 11, 2022

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

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2022-3031211**

Dear Secretary Chiavetta:

Consistent with Section 5.412a of the Commission's regulations, 52 Pa. Code § 5.412a, which requires the electronic submission of pre-served testimony, enclosed please find the following testimony and exhibits on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) in the above referenced matter:

- CAUSE-PA Statement 1, the Direct Testimony of Harry S. Geller, Esq., Appendix A: Resume of Harry S. Geller, Esq., CAUSE-PA Appendix B: Cited Discovery Responses,
- CAUSE-PA Statement 1-R, the Rebuttal Testimony of Harry S. Geller, Esq.,
- CAUSE-PA Statement 1-SR, the Surrebuttal Testimony of Harry S. Geller, Esq.,
- Testimony Verification of Harry S. Geller, Esq.

A copy of this letter is being served on the parties of record consistent with the attached Certificate of Service. As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet", written over a horizontal line.

John W. Sweet
Counsel for CAUSE-PA

CC: *Certificate of Service*
Honorable Christopher P. Pell
Honorable John Coogan

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
v. : Docket No. R-2022-3031211
 :
Columbia Gas of Pennsylvania, Inc. :

Certificate of Service

I hereby certify that I have this day served copies of the **Testimony Filing Letter** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission's March 20 Emergency Order at Docket M-2020-3019262.

VIA Email

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August 11, 2022

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031211
	:	
Columbia Gas of Pennsylvania, Inc.	:	

DIRECT TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

June 7, 2022

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PREPARED DIRECT TESTIMONY OF HARRY GELLER

Q. Please state your name, occupation, and business address.

A. My name is Harry S. Geller. I am an attorney. I am retired as the Executive Director of the Pennsylvania Utility Law Project (PULP), but have maintained an office at 118 Locust St., Harrisburg, PA 17101 for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q. Briefly outline your education and professional background.

A. I received my B.A. degree from Harpur College, State University of New York at Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in 1969. Upon graduation from law school, I entered the Volunteers in Service to America (VISTA) program, where I was assigned to the New York University Law School. I took courses in the Law School's Urban Affairs and Poverty Law program and worked with the Community In Action Program on the West Side of Manhattan in New York City from 1969-1971. In 1971, I started as a Staff Attorney for the New York City Legal Aid Society, Criminal Court, and Supreme Court Branches in New York County. In 1974, I moved to Pennsylvania and began working for Legal Services, Incorporated (LSI). LSI was a civil legal aid program serving Adams, Cumberland, Franklin, and Fulton Counties. I worked at LSI from 1974-1987 first as a Staff Attorney, then as Managing Attorney, and ultimately became Executive Director. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

In 1988, I was hired to be the Executive Director of PULP, a statewide legal aid project dedicated to protecting the rights of low income utility customers. At PULP, I represented low income individuals with utility and energy concerns and supported organizations advocating for

1 low income households in utility and energy matters. As the Executive Director, I consulted and
2 co-counseled on a wide variety of individual utility consumer cases, and I participated in task
3 forces, work groups and advisory panels, including serving as chair of the Department of Human
4 Services' LIHEAP Advisory Committee and the Pennsylvania Public Utility Commissions'
5 Consumer Advisory Committee. I frequently trained communities, legal aid staff, and advocacy
6 groups across Pennsylvania about the various utility and energy matters affecting Pennsylvania's
7 low income population. I retired from PULP on June 30, 2015. Since that time, I have continued
8 to provide consulting services for PULP and its clients, as well as other organizations serving the
9 low income community.

10 In sum, I have 50 years of experience working on behalf of households in poverty, including
11 the past 30 years focusing specifically on utility and energy issues affecting low income
12 consumers. My resume is attached as Appendix A.

13 **Q: Please describe the focus of your work over the past fifty years, including relevant**
14 **work experience on issues of low income families' ability to afford essential services such as**
15 **utilities?**

16 A: I have represented low income individuals and organizations serving low income
17 populations in a wide variety of legal matters, including family law, public benefits,
18 unemployment compensation, utility shut-offs, debtor/creditor, and housing-related disputes. Over
19 the past 30 years, my focus has been to ensure that low income households can connect to, afford,
20 and maintain utility and energy services.

21 In all of these legal matters, I worked almost exclusively on behalf of individuals and
22 households that subsist on incomes at or below 150% of the Federal Poverty Level (FPL). Through
23 this work, I have had a close view of the daily lives of countless of our poorest citizens. I have

1 spent thousands of hours assisting clients, combing through their budgets to see whether it is even
2 possible to make ends meet. Over the years, I have consistently seen the near total absence of the
3 ability of low income families to afford the most basic monthly necessities with the incomes they
4 have, even assuming heroic self-control and conscientious budgeting and spending. Almost every
5 month, my clients faced the stark reality of having to choose which bills they can forgo with the
6 least drastic consequences.

7 In addition to my deep understanding of the daily monetary struggles facing poor families,
8 I have an extensive knowledge of the array of programs designed to allow low income individuals
9 to afford utility service. While at PULP, I was involved in hundreds of proceedings evaluating the
10 effectiveness of programs that are intended to reduce low income households' energy burdens and
11 help them conserve energy through efficiency and weatherization. I have spent thousands of hours
12 identifying the problems in Universal Service programs and making recommendations for changes
13 to these programs to better serve low income consumers. This advocacy ultimately led to the
14 recognition of the need to develop integrated programs for low income consumers. Furthermore, I
15 played an instrumental role in the development, oversight, and monitoring of the initial pilot and
16 then the statutorily required low income Universal Service Programs, each of which is structured
17 to provide a different form of assistance to low income customers to enable those customers to
18 afford and maintain basic service.

19 For example, the Customer Assistance Program (CAP) provides alternatives to traditional
20 collection methods for low income, payment troubled utility customers, allowing participants to
21 receive a more affordable bill and earn forgiveness on arrears in exchange for making in-full
22 payments on their discounted bill. In turn, the Low Income Usage Reduction Program (LIURP) is
23 a targeted weatherization program designed to assist low income households with the highest

1 energy consumption, payment problems, and arrearages to reduce their overall energy
2 consumption. CAP and LIURP work in tandem and are designed to assist low income households
3 in maintaining affordable utility services and safe living environments while reducing utility
4 collection, thereby benefitting other ratepayers and the communities in which they live and work.

5 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

6 A: Yes. I have presented testimony in many proceedings before the PUC. A complete list is
7 included in my resume, which is attached as Appendix A.

8 **Q: For whom are you testifying in this proceeding?**

9 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
10 Efficiency in Pennsylvania (CAUSE-PA).

11 **Q: What is the purpose of your testimony?**

12 A: CAUSE-PA intervened in this proceeding to ensure that the proposed rate increase and rate
13 design will not adversely affect Columbia Gas of Pennsylvania, Inc.'s (Columbia, CPA, or the
14 Company) low income customers' ability to connect to, maintain, and afford natural gas service,
15 which is essential for heating, cooking, and hot water – all critical components to a safe and healthy
16 home.

17 **Q: How is your testimony organized?**

18 A: My testimony is divided into four substantive sections and one section summarizing my
19 proposals and recommendations. In section I, I discuss the financial impact that Columbia's
20 proposed residential rate increase will have on its low income ratepayers. In section II, I discuss
21 Columbia's universal service programs, including its customer assistance program (CAP) and low

1 income usage reduction program (LIURP), and whether those programs are adequate to provide
2 low income customers with just and reasonable rates and service. In section III, I discuss
3 Columbia’s proposed Energy Efficiency and Conservation (EE&C) plan. In section IV, I discuss
4 Columbia’s proposed rate design, including its proposed increase to the residential fixed customer
5 charge and proposed Revenue Normalization Adjustment (RNA). In section V, I recommend
6 Columbia establish additional customer service metrics. Finally, in section VI, I will summarize
7 the recommendations and proposals which I provided throughout my direct testimony.

8 **I. IMPACT OF RATE INCREASE ON LOW INCOME HOUSEHOLDS**

9 **Q: Please summarize the Company’s requested rate increase as it applies to residential**
10 **customers.**

11 A: On March 18, 2022, Columbia Gas of Pennsylvania, Inc. (Columbia), filed Supplement
12 No. 337 to Tariff Gas Pa. P.U.C. No. 9 to become effective May 17, 2022, containing proposed
13 changes in rates, rules, and regulations calculated to produce \$82.2 million in additional annual
14 revenues.¹ Under the proposed increase, the total bill for a residential customer who purchases 70
15 therms of gas from Columbia per month, would increase 10.09% from \$123.24 to \$135.67, an
16 increase of \$12.43 per month or \$149.16 annually.² The specific rate impact to individual
17 customers will depend on each customer’s level of usage. However, most of the impact of
18 Columbia’s proposed rate increase for residential customers comes from a substantial increase to
19 the fixed monthly service charge. Columbia proposes to increase the monthly residential customer
20 charge by over 52% from \$16.75 to \$25.47, a monthly increase of \$8.72 – or \$104.64 annually.³

¹ See CPA Rate Filing Cover Letter (March 18, 2022).

² Id.

³ CPA St. 6 at 23.

1 **Q: How have Columbia’s rates changed over the past several years?**

2 A: The Company’s proposal would be Columbia’s tenth rate increase since 2010.⁴ Since then,
3 the residential bill for a customer using 70 therms has increased 29.6% from \$90.12 in 2010 to
4 \$116.83 in 2021.⁵ The distribution charge portion of a residential bill for customers using 70
5 therms per month has increased 23.5% from \$30.35 in 2010 to \$67.82 in 2021.⁶ As of March 2022,
6 the time of filing this rate case, the residential bill for residential customers using 70 therms per
7 month had increased another 5.5% - to \$123.24. If Columbia’s increase is approved as proposed,
8 the bill for residential customers using 70 therms per month would increase another 10.9% to
9 135.67, which would be a 50.5% increase since 2010.⁷

10 **Q: How many customers in Columbia’s service territory are considered to be low income**
11 **customers?**

12 A: Roughly 17-24% of Columbia’s residential customers are considered to be “low income”
13 – meaning their household income is at or below 150% of the federal poverty level.

14 Like other large regulated public utilities in Pennsylvania, Columbia tracks its low income
15 customer population two ways: estimated low income customers and confirmed low income
16 customers.⁸ The “estimated low income customer” count, uses census data provided by the
17 Commission’s Bureau of Consumer Services (BCS) and the Company’s residential customer count
18 to estimate the likely number of low income customers in its service territory.⁹ The “confirmed

⁴ CAUSE-PA to CPA II-3, Attach. A.

⁵ CAUSE-PA to CPA II-1, Attach. A.

⁶ CAUSE-PA to CPA II-2, Attach. A.

⁷ See CPA Rate Filing Cover Letter.

⁸ See Pa. PUC, BCS, 2020 Report on Universal Service Programs & Collections Performance, at 2,4 (Nov. 2021) (herein 2020 Universal Service Report).

⁹ CAUSE-PA to CPA I-2.

1 low income customer” count includes only customers with active service that have provided self-
2 declared or verified income information indicating they have low income.¹⁰

3 As of April 2022, Columbia reported that it serves 71,740 confirmed low income
4 customers, representing approximately 17.5% of its 409,839 residential customers.¹¹ In 2019, the
5 Company reported 97,268 estimated low income customers and in 2020, the Company reported
6 96,648 estimated low income customers.¹² These estimated low income customer numbers
7 represent 24.3% and 23.8% of Columbia’s residential customers in 2019 and 2020 respectively.¹³

8 ***In other words, based on census data proportional to Columbia’s customer base, nearly 1 in 4***
9 ***residential households in Columbia’s service territory have “low income” – meaning their total***
10 ***gross household income is at or below 150% of the federal poverty level.***

11 Both metrics show that a substantial number of Columbia’s customers are low income,
12 however the estimated low income customer count, developed by BCS, presents a more accurate
13 picture of Columbia’s low income customer population. The confirmed low income customer
14 count provides only a limited assessment of the low income population – counting only the number
15 of customers who have already affirmatively obtained assistance or otherwise reported their
16 income level to the Company. For purposes of evaluating the effectiveness of its universal service
17 program participation and outreach, it is more accurate to utilize the census-based estimated low
18 income customer counts – which are proportionate to the number of residential customers in each

¹⁰ CAUSE-PA to CPA I-3.

¹¹ CAUSE-PA to CPA I-1, I-3.

¹² Id.

¹³ See 2019 Universal Service Report at 7; 2020 Universal Service Report at 9. Note that Columbia was unable to provide an estimated low income customer count for 2022. See CAUSE-PA to CPA I-2.

1 county within Columbia's service territory.¹⁴ Nevertheless, regardless of the measure applied,
2 there are a substantial number of residential low income customers in Columbia's service territory.

3 **Q: What is the significance of the discrepancy between Columbia's confirmed and**
4 **estimated low income customer counts?**

5 A: Without a more precise estimate of the low income customer population, it is difficult to
6 examine the true extent of the impact of Columbia's near-annual rate increase on Columbia's low
7 income customer base and the appropriate level of response to Columbia's proposed changes. This
8 is because the Company only reports on collections and termination data for its *confirmed* low
9 income customer base. Reliance on collections and termination data for confirmed low income
10 customers, when that number is not truly representative of the low income customer base, masks
11 the extent of unmet need for rate assistance in order to reasonably afford service. As I will discuss
12 later in my testimony, Columbia's assistance programs are reaching only a small percentage of
13 confirmed low income customers – which necessarily means that it is reaching an even smaller
14 percentage of its estimated low income customers.

15 If Columbia were able to better identify its low income customers, it could more effectively
16 implement critical customer service standards for low income households - including the provision
17 of extended payment arrangements, prohibitions on winter termination and security deposits, and
18 access to rate assistance programs. Columbia is under a statutory duty to provide consumers with
19 the most advantageous rate¹⁵ and, as such, must do a better job of identifying its low income

¹⁴ CAUSE-PA to CPA I-2.

¹⁵ 66 Pa. C.S. §1303.

1 customer base to ensure they are receiving service under the best available rates, terms, and
2 conditions.

3 **Q: Do you have any recommendations for how Columbia could improve its ability to**
4 **identify and serve its low income customer base?**

5 A: Yes. To more accurately identify and better serve its low income customer base, I
6 recommend that Columbia screen all new and moving customers for income level at the time their
7 service is established. For existing customers, Columbia should routinely screen for income on
8 any non-emergency calls, and/or should inquire whether there has been any update to their income
9 information already noted in their account. Upon establishing an online account, and once
10 annually thereafter, customers should be given the opportunity to voluntarily self-disclose any
11 changes to their income information. All customers identified as low income through this process
12 should be referred for enrollment in Columbia's universal service programs. Consumers should
13 be able to opt out of disclosing their income if they so choose, but should first be informed that
14 they may be eligible for rate assistance or energy efficiency measures.

15 Improving the identification of low income customers, and better matching them to critical
16 rate assistance and usage reduction services, is essential to improving Columbia's ability to
17 provide just and reasonable services to low income households. It would also help improve the
18 ability of Columbia, the Commission, and stakeholders to assess Columbia's customer service
19 metrics – including its credit, collections, termination, reconnection, complaint, and universal
20 service data – to determine whether and to what extent its rates, policies, and programs are just
21 and reasonable in appropriately serving the needs of its low income customers.

1 **Q: What level of income qualifies a household as a “low income”?**

2 A: With some exceptions, most utility assistance programs require households to have income
3 that is not greater than 150% of the federal poverty level (FPL) to qualify. The FPL is a measure
4 of poverty based exclusively on the size of the household, but not the composition of the household
5 (i.e., whether the household consists of adults or children) or geography. As a baseline, a family
6 of four at 150% FPL has a gross annual income of just \$41,265.¹⁶ This is insufficient income to
7 support a family of this size and is substantially less than a household this size needs to meet their
8 basic expenses in any of the counties in Columbia’s service territory.¹⁷

9 The Self Sufficiency Standard is a benchmark often used to assess how much income a
10 household needs to live without assistance in Pennsylvania. This tool measures the income that a
11 family must earn to meet their basic needs and consists of the combined cost of 6 basic needs –
12 housing, child care, food, health care, transportation, and taxes – without the help of public
13 subsidies.¹⁸ Unlike the federal poverty level, which does not change based on geographic location
14 or family composition, the Self Sufficiency Standard accounts for the varied costs of these six
15 basic needs in different geographical areas and for differently aged household members.¹⁹ In 2021,
16 the average Self Sufficiency Standard for a family of four in the Pennsylvania counties served by
17 Columbia was ranged from a low of \$37,470.76 for a family with two adults and two teenagers to

¹⁶ U.S. Dept. of Health and Human Services, 2022 U.S. Federal Poverty Guidelines, available at <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

¹⁷ Self Sufficiency Standard, <http://www.selfsufficiencystandard.org/Pennsylvania>.

¹⁸ See PathWays PA, *Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania*, available at: https://pathwayspa.org/wp-content/uploads/2020/01/PA2019_OverlookedUndercounted_Web.pdf

¹⁹ See PathWays PA, *Overlooked and Undercounted, How the Great Recession Impacted Household Self-Sufficiency in Pennsylvania*, available at: <http://www.selfsufficiencystandard.org/sites/default/files/selfsuff/docs/PA2012.pdf>.

1 a high of \$73,558.33 for a family with one adult and three infants.²⁰ It is notable that the highest
2 costs fall on the families with more young children and fewer adults in the home.

3 Most of Columbia’s confirmed low income customers do not have income that is even
4 close to these numbers. The average annual income for Columbia’s confirmed low income
5 customers is just \$15,133.73.²¹ The average income for low income customers actively enrolled
6 in Columbia’s Customer Assistance Program (CAP) is just \$14,673.73.²² The income for these
7 families falls far short of the self-sufficiency standard needed to be self-sufficient and live without
8 financial assistance, especially for families with small children and single parent households. Any
9 increase in the cost of necessities, including the rates for natural gas for heating, cooking, and hot
10 water, will result in increased unaffordability for low and moderate income households, and will
11 likely result in a corresponding increased rate of involuntary service terminations and uncollectible
12 expenses.

13 **Q: How would Columbia’s proposed rate increase impact low income households?**

14 A: Low income families struggle to make ends meet each month and are often forced to choose
15 between critical necessities; thus, any increase in costs for essential services, like natural gas, will
16 severely impact these households forcing many to make impossible trade-offs between paying for
17 shelter, food, utilities, or other basic needs. Columbia’s proposed average 10.09% increase of
18 \$12.43 per month (\$149.16 annually) is a substantial increase in basic living expenses even for
19 many moderate income households. For low income households who already struggle to afford

²⁰ Average Self Sufficiency Standard of all counties served by Columbia. See Sufficiency Standard – 2022 Pennsylvania Dataset, available at: <http://www.selfsufficiencystandard.org/Pennsylvania>.

²¹ CAUSE-PA to CPA I-5.

²² CAUSE-PA to CPA I- 6.

1 their monthly bills, the effects of the proposed increase will impact their ability to connect to,
2 maintain, and afford natural gas service.

3 To further contextualize the impact of the proposed increase on low income households, it
4 is helpful to look at the relative energy burden (the percentage of income a household pays for
5 energy costs) of low income households. To be affordable, a household's total housing costs –
6 *including utility costs* - should account for no more than 30% of the household's total income.²³
7 But across Pennsylvania, households with income at or below 150% FPL spend as much as 29%
8 of their income on *energy costs alone*.²⁴ In comparison, BCS estimates that the energy burden of
9 Pennsylvania's residential customers as a whole (exclusive of those enrolled in a Customer
10 Assistance Program (CAP)) is roughly 4%.²⁵

11 The average annual income for Columbia's confirmed low income customers is just
12 \$15,133.73, or \$1,261.14 per month.²⁶ Columbia's proposed rate increase would raise the total bill
13 for the average residential heating customer from \$123.24 to \$135.67 per month.²⁷ Thus, if
14 approved, the average energy burden for a Columbia confirmed low income customer with average
15 income and average usage would increase from 9.8% to 10.8%, *not including their electric bill*
16 *burden*. The energy burden for these customers is already far above what is considered affordable,
17 and Columbia proposes to raise it even higher. As I discuss more thoroughly below, even with bill

²³ US Dep't of Housing & Urban Development, Affordable Housing, available at https://www.hud.gov/program_offices/comm_planning/affordablehousing.

²⁴ See Fisher, Sheehan & Colton, *The Home Energy Affordability Gap: Pennsylvania* (April 2021), http://www.homeenergyaffordabilitygap.com/03a_affordabilityData.html.

²⁵ Energy Affordability for Low income Customers, Docket No. M-2017-2587711, *Order*, at 8 (Jan. 17, 2019); see also Diana Hernandez, *Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change*, 103(4) *Am. J. Pub. Health* (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

²⁶ CAUSE-PA to CPA I-5.

²⁷ *Id.*

1 assistance through CAP, many of Columbia’s low income consumers still face high energy
2 burdens – with average energy burdens still exceeding 7% of household income.²⁸ In contrast, the
3 Commission has determined that, to be considered affordable to low income households, natural
4 gas burdens should not exceed 2% of household income for customers with income at or below
5 50% FPL and should not exceed 4% of household income for customers with income between 51-
6 150% FPL.²⁹ Thus, the natural gas burdens of Columbia’s CAP customers far exceed the
7 maximum levels recommended by the Commission.³⁰

8 The overwhelming energy burden on low income households makes it difficult to pay for
9 other basic necessities such as housing, food, and medicine; threatens stable and continued
10 employment and education; has substantial and long-term impacts on mental and physical health;
11 creates serious risks to the household and the larger community; and negatively impacts the greater
12 economy.³¹ According to the U.S. Energy Information Administration, in 2020, approximately
13 one third of households surveyed reported household energy insecurity and nearly a quarter of
14 households reported that they reduce or forego other critical necessities like food and medicine to
15 afford their home energy costs.³² In a 2018 survey conducted by the National Energy Assistance
16 Directors’ Association, 72% of LIHEAP recipients reported foregoing other necessities to afford
17 energy, and 26% reported keeping their home at unsafe or unhealthy temperatures.³³

²⁸ CAUSE-PA to CPA I-7.

²⁹ 52 Pa. Code § 69.261 et seq.

³⁰ Id.

³¹ US EIA, Residential Energy Consumption Survey 2020, available at: <https://www.eia.gov/consumption/residential/data/2020/index.php?view=characteristics> (hereinafter RECS Survey); see also NEADA, 2018 National Energy Assistance Survey, at 17, 20 (Dec. 2018), available at: <http://neada.org/wp-content/uploads/2015/03/liheapsurvey2018.pdf> (hereinafter NEADA Survey).

³² RECS Survey, Table HC11.1 Household energy insecurity, 2020.

³³ NEADA Survey at 17, 20.

1 Ultimately, an increase in rates for natural gas service such as the increase proposed here
2 will necessarily result in increased unaffordability for economically vulnerable households and is
3 likely to result in a corresponding increase in involuntary payment-related terminations and, in
4 turn, uncollectible expenses borne by all residential ratepayers. These impacts will cause a deep
5 and lasting detrimental effect on the health and wellbeing of those in the household and the welfare
6 of the entire community.³⁴

7 **Q: Is there other evidence that Columbia’s low income customers already struggle to**
8 **afford and maintain natural gas service – even before any rate increase is approved?**

9 A: Yes. There are strong indicators that service is already unaffordable. A disproportionate
10 percentage of Columbia's payment troubled residential customers are low income. Even though
11 confirmed low income customers only account for approximately 17.5% of residential
12 customers,³⁵ they account for 61.2% of payment troubled customers.³⁶ Confirmed low income
13 customers also account for 39.7% of customers in debt and 46.5% of dollars in debt.³⁷ As of April
14 2022, 14.19% of confirmed low income customers were in debt to Columbia, compared to just
15 6.26% of general residential customers.³⁸ As I explained above, the disparities are likely even
16 greater, given the confirmed low income customer data is not fully representative of the low
17 income customer population.

³⁴ See *id.* When a family is unable to use their primary heating system, they often resort to dangerous, high usage, and high-cost alternative heating methods such as electric space-heaters, electric stoves, and/or portable generators, which increases the risk of carbon monoxide poisoning and house fires – placing themselves and the greater community at risk of harm. See Nat’l Fire Protection Ass’n, Fire Analysis & Research Division, Home Fires Involving Heating Equipment, at 1 (Dec. 2018) (finding that space heaters cause 44% of all home heating related fires, and 86% of deaths caused by home heating related fires).

³⁵ CAUSE-PA to CPA I-1, I-3.

³⁶ CAUSE-PA to CPA I-8.

³⁷ CAUSE-PA to CPA I-10, Attach. A.

³⁸ CAUSE-PA to CPA I-10, Attach. A.

1 The rate of payment trouble for Columbia’s confirmed low income customers has increased
2 substantially since 2019. In 2019, Columbia reported that 8,332 of its confirmed low income
3 customers were payment troubled, accounting for 12.3% of its 67,582 confirmed low income
4 customers.³⁹ As of December 2021, that number had increased to 11,027, accounting for 16.1%
5 of its 68,480 confirmed low income customers.⁴⁰

6 These indicators demonstrate that Columbia’s low income consumers already struggle to
7 pay for natural gas service, and will likely experience increased payment trouble if the proposed
8 rate increase is approved without taking necessary measures to mitigate the impact of the increase
9 on low income households.

10 **Q: Do you believe that there is an increased threat of termination for low income**
11 **customers as a result of the proposed rate increase?**

12 A: Yes. Low income customers already have a markedly higher rate of termination compared
13 to average residential customers. In 2021, Columbia terminated 9,760 residential customers for
14 non-payment.⁴¹ Of those residential terminations, 5,475 were confirmed low income customers.⁴²
15 Thus, despite comprising only 17.5% of residential customers,⁴³ confirmed low income customers
16 accounted for 56% of residential terminations. Columbia is unable to say how many of these
17 customers were reconnected, nor how long it took for those customers to be reconnected.⁴⁴

18 The disparity in involuntary termination rates for Columbia’s low income customers
19 underscores the need for Columbia to remediate rate unaffordability by further strengthening the

³⁹ 2019 Universal Service Report at 5, 8.

⁴⁰ OCA to CPA III-6, Attach. C.

⁴¹ CAUSE-PA to CPA I-14.

⁴² CAUSE-PA to CPA I-15.

⁴³ CAUSE-PA to CPA I-1, I-3.

⁴⁴ CAUSE-PA to CPA I-14, I-15, I-16.

1 availability and assistance provided to low income consumers through its universal service
2 programs to offset unaffordability at both existing and proposed rates.

3 **Q: How does the involuntary termination of natural gas service impact a household?**

4 A: Loss of natural gas service has a deep and lasting impact on the health and wellbeing of
5 the entire household and the community as a whole and is a common catalyst to homelessness.⁴⁵
6 When a family is unable to use a primary heating system, they often resort to dangerous, high
7 usage / high cost heating methods – such as electric space-heaters, electric stoves, and/or portable
8 generators – which increases the risk of carbon monoxide poisoning and house fires.⁴⁶ Heating
9 equipment is a leading cause of fires in U.S. homes.⁴⁷ Space heaters are most often responsible for
10 home heating equipment fires, accounting for more than two in five fires, as well as the vast
11 majority of the deaths and injuries in home fires caused by heating equipment.⁴⁸ As of February
12 2022, Columbia reported that at least 364 of its residential customers were *known* to be without a
13 central heating source in the winter months, and at least 152 households were *known* to be using a
14 potentially unsafe alternative heating source.⁴⁹ This is dangerous to the life and health of the
15 individual family and the surrounding community, and is driven primarily by the inability of that
16 family to afford the cost of service. Increasing the cost of service and the affordability gap, without
17 concurrently providing strong mitigation will exacerbate the health and safety consequences to

⁴⁵ See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>.

⁴⁶ Richard Campbell, Home Heating Fires, National Fire Protection Association (NFPA), (Jan. 2021), available at: <https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Heating-equipment>

⁴⁷ Id.

⁴⁸ Id.

⁴⁹ Pa. PUC, 2021 Cold Weather Survey Results – Gas, available at: <https://www.puc.pa.gov/filing-resources/reports/electric-gas-water-cold-weather-survey-results/> .

1 Pennsylvania’s most economically vulnerable households, which are disproportionately single
2 parents with young children, people of color, seniors, and people with a disability.

3 Columbia must take steps to protect its most vulnerable customers from the harsh consequences
4 of its proposed rate increase. I will make several recommendations later in my testimony that will
5 enable Columbia to better protect these vulnerable customers.

6 **II. UNIVERSAL SERVICE PROGRAMS**

7 **Q: Please briefly describe Columbia’s Universal Service Programs.**

8 A: As required by Commission regulations, Columbia has established a Universal Service and
9 Energy Conservation Plan (USECP).⁵⁰ Columbia’s universal service programs include (1) a
10 Customer Assistance Program (CAP), (2) a Hardship Fund, (3) a Low Income Usage Reduction
11 Program (LIURP), and (4) a Customer Assistance and Referral Evaluation Services (CARES).⁵¹

12 In this section, I will address Columbia’s CAP, LIURP, and Hardship Fund programs and
13 provide recommendations for how Columbia should improve each of these programs to better
14 address the need for assistance for Columbia’s low income customers to remediate rate
15 unaffordability at both existing and proposed rates.

16 **Q: Why is it appropriate to address these programs in the context of this rate case?**

17 A: These programs are designed to work in tandem to provide bill assistance, arrearage
18 management, usage reduction, and crisis assistance – helping to ensure that consumers with limited
19 economic means can reasonably afford to connect and maintain service to their home. The

⁵⁰ Columbia Gas of PA, Inc., Universal Service and Energy Conservation Plan (USECP), Docket No. M-2018-2645401, at 23 (revised Nov. 25, 2019) (hereinafter 2019-2023 USECP).

⁵¹ 2019-2023 USECP at 6-11.

1 Commission periodically reviews these programs every five years. However, in the interim, when
2 changes are proposed that will affect low income customer households' ability to afford and
3 maintain service, it is critical to examine whether a utility's universal service programming, rules,
4 and policies will be impacted by an intervening rate increase, and, if so, to make necessary changes
5 to remediate that impact. As I noted earlier, Columbia has raised rates every year for the last
6 decade – increasing the cost of natural gas service approximately 50% in that time. The adequacy
7 of universal service programming to remediate rate unaffordability each time rates are proposed
8 to increase is an essential element in determining the just and reasonableness of the proposed
9 increased, as well as the adequacy of the customer service which is provided to the low income
10 customer base. The failure to provide such an examination and to remediate the effect in the
11 context of a rate case, causes low income households to face unjust and unreasonable rates,
12 resulting in increased involuntary termination rates for low income households and higher
13 uncollectible expenses for other residential consumers.

14 **a. Customer Assistance Program (CAP)**

15 **Q: Are customers who are enrolled in the Columbia's Customer Assistance Program**
16 **(CAP) protected from the financial impact of the rate increase?**

17 A: That answer depends on the type of CAP rate the customer receives and, for some, when
18 they are assigned that rate. In short, more than half of Columbia's CAP customers will see their
19 rates increase as a result of its proposal – yet Columbia has not proposed a single mitigation
20 measure to help alleviate this impact.

1 Columbia offers four CAP rates:⁵²

- 2 1) **Percentage of income** - which is calculated based on a fixed percentage of the
- 3 customer's income;
- 4 2) **Average of payments** - which is based on the average of payments made by the
- 5 customer in the last 12 months prior to joining CAP;
- 6 3) **Percent of Bill** - which is set at 50% of budget billing; and
- 7 4) **Minimum payment** - which is set at \$25.

8 As of April 2022, a majority (53.5%) of Columbia's CAP customers are billed at the Percent of
9 Bill CAP rate. These households pay 50% of their applicable budget billing rate, and will be
10 charged half (50%) of any approved increase after their next budget payment re-evaluation.⁵³ Only
11 the remaining 46.5% of Columbia's current CAP customers (those not billed at the percentage of
12 bill option) would be insulated from the financial impact of a rate increase.⁵⁴ Thus, a majority of
13 CAP customers would be impacted by the proposed increase.

14 **Q: Are any other CAP customer groups likely to experience higher costs because of the**
15 **rate increase?**

16 **A:** Yes. The proposed rate increase will impact the CAP bills of customers who receive the
17 average payment CAP rate *after* the rate increase takes effect. The average payment plan charges
18 CAP customers the average of payments made for the last 12 months prior to joining CAP.⁵⁵ After
19 the rate increase takes effect, those applying for CAP will likely have made higher payments

⁵² Currently, CAP customers with income between 0-110% FPL are billed at 7% of the household's monthly income; those with income between 101-150% FPL are billed at 9% of the household's monthly income; and those with income between 101-150% FPL are billed at 9% of the household's monthly income. See 2019-2023 USECP, at 23.).

⁵³ CAUSE-PA to CPA I-4, Attach A.

⁵⁴ Id.

⁵⁵ 2019-2023 USECP at 23.

1 toward their increased bill over the twelve months prior to enrolling. Thus, their historical average
 2 payment rates will be higher, as will their assessed CAP payment.

3 **Q: Are all low income customers enrolled in CAP?**

4 A: No. Notably, CAP only reaches a small portion of the eligible population. As of April
 5 2022, only 25,096 of Columbia customers were enrolled in CAP⁵⁶ – this is approximately 35% of
 6 Columbia’s confirmed low income customers⁵⁷ – and just 26% of Columbia’s estimated low
 7 income customers.⁵⁸ Therefore, between 65-74% of Columbia’s low income customers are not
 8 enrolled in CAP, and will bear the full impact of the proposed rate increase.

9 Columbia’s CAP participation rate has shown no measurable improvement in the last
 10 decade – despite the fact that it has raised rates significantly over this time.

11 **TABLE 1: Columbia CAP Participation Rate⁵⁹**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Columbia	34%	33%	30%	30%	30%	31%	29.9%	32.8%	34.9%	33.6%	34.6%

12

⁵⁶ CAUSE-PA to CPA I-7.

⁵⁷ See CAUSE-PA to CPA I-3 (CPA reports 71,740 confirmed low income customers).

⁵⁸ See CAUSE-PA to CPA I-2, Attach. A (CPA reports 97,268 estimated low income customers).

⁵⁹ The CAP enrollment rate is the total of CAP customers as of December 31 of the given year, divided by the number of confirmed low income customers. CAP enrollment rates were collected from the Commission’s Universal Service Programs & Collections Performance Reports (hereinafter Universal Service Reports). The last publicly available CAP enrollment data was released in December 2019 for the 2018 calendar year.

See 2019 Universal Service Report at 51, 2018 Universal Service Report at 52; 2017 Universal Service Report at 51; 2016 Universal Service Report at 50; 2015 Universal Service Report at 42; 2014 Universal Service Report at 42; 2013 Universal Service Report at 37; 2011 Universal Service Report at 40; 2009 Universal Service Report at 39; 2008 Universal Service Report at 38. Note that percentages were rounded to the nearest whole number.

1 As of April 2022, Columbia’s CAP participation rate stood at 35% - just over a half of a
2 percentage point higher than its participation rate in 2010.⁶⁰ Improving CAP participation will help
3 the Company reduce the disproportionate number of payment troubled low income customers, as
4 well as the substantial amount of debt that is carried by low income customers. Regardless of
5 whether any rate increase is ultimately approved, Columbia must be required to measurably
6 improve its CAP enrollment rates to reach *all households* in need of assistance to access and
7 maintain safe and affordable natural gas services. I believe Columbia could effectively do so by
8 adopting the standardized income screening process I recommended above to better identify low
9 income customers at the time service is established and make appropriate referrals to enroll in
10 universal service programming.

11 **Q: Do you have additional recommendations that will help improve Columbia’s CAP**
12 **participation rate?**

13 A: Yes. I recommend that Columbia establish benchmarking goals for its CAP enrollment
14 based on the percentage of its estimated low income customers. Specifically, Columbia should
15 strive to increase its CAP enrollment by a minimum 5% each year as a percentage of its estimated
16 low income customers, and should set forth a plan to do so through increased outreach, education,
17 and implementation of the screening process I recommended earlier in my testimony. I
18 recommend measuring against the estimated low income customer count because that figure
19 provides a more realistic estimate of Columbia’s low income population – and avoids the
20 circuitous nature of reliance on confirmed low income customer counts to determine the
21 reasonableness of service to Columbia’s low income customer population. As discussed,

⁶⁰ CAUSE-PA to CPA I-3, I-4, Attach. A.

1 confirmed low income customer counts include only those households Columbia has identified to
2 be low income, and is not adequately representative of the true need for assistance.

3 Taken together with the income screening process I recommend above, I believe that
4 setting reasonable and verifiable benchmarks to improve CAP enrollment as a percentage of the
5 estimated low income customer count will help ensure that the Company can identify and enroll a
6 larger number of its estimated low income population into CAP, thus helping improve bill
7 affordability for Columbia's economically vulnerable consumers and correspondingly reduce
8 terminations and uncollectible expenses attributable to these households.

9 I also recommend that Columbia permanently adopt its policy of allowing income
10 verification documentation that had not previously been accepted for CAP enrollment that the
11 Company adopted during the COVID-19 pandemic.⁶¹ Accepting documentation such as year to
12 date pay stubs (rather than requiring a full 30 days' worth of stubs) provides applicants with
13 additional flexibility while still providing the requisite evidence of low income earnings for CAP
14 application purposes.

15 **Q: In addition to improved CAP enrollment, are there other steps Columbia can take to**
16 **help ensure that low income customers are better able to afford natural gas service and, thus,**
17 **are more appropriately shielded from the financial impact of a rate increase?**

18 A: Yes. Columbia should reduce its maximum CAP energy burden thresholds, consistent with
19 the commitment it made in its 2018 rate case – now three base rate proceedings ago.⁶² Columbia

⁶¹ CAUSE-PA to CPA I-22.

⁶² See Pa. PUC v. Columbia, Joint Petition for Partial Settlement, Docket No. R-2018-2647577, at 15, para. 57 (filed Aug. 31, 2018, approved by Final Order issued Dec. 6, 2018). Notably, in her Recommended Decision issued in Columbia's 2020 base rate case, Administrative Law Judge Katrina Dunderdale observed:

1 already agreed to make the necessary adjustments to its CAP energy burdens to comply with the
2 recommended maximum CAP energy burdens in the settlement of its 2018 rate case.⁶³ CAUSE-
3 PA supported and relied upon Columbia’s commitment to abide by the findings of the Energy
4 Affordability Report in agreeing to the settlement in that case.⁶⁴ The relevant provision of the
5 settlement reads as follows:

6 57. Following release of the Commission's Energy Burden Study, Columbia will
7 present information to its USAC about how Columbia's then-current payment
8 selection options address the issues raised by the Energy Burden Study. **By no later
9 than its next Universal Service and Energy Conservation Plan ("USECP")
10 filing following issuance of the Energy Burden Study or earlier date dictated
11 by the Commission's Energy Burden Study (whichever is sooner), Columbia
12 will make such filing as required by the Energy Burden Study to modify or
13 change its CAP rate selection.**⁶⁵

14 Although Columbia has increased its rates nearly every year since entering this settlement,
15 it has yet to honor its agreement to lower its CAP rates. Columbia’s failure to provide just,
16 reasonable, and adequate service to the low income customer base is a reason for rate increase
17 denial. Failure to fulfill its obligations made in former rate cases is one example of failure to
18 provide such service.

Columbia Gas’ behavior, vis a vis, the energy burden is disturbing. As noted by CAUSE-PA, Columbia Gas’ most recent USECP was approved in January 2020 and asserted additional changes should wait until the Company’s next USECP filing. Yet, in the settlement in its last rate case in 2018, the Company agreed to adjust its CAP energy burdens to be in compliance with the recommended maximum CAP energy burdens once the Energy Affordability Study was released, and to make the Commission’s recommended changes by its next USECP proceeding ‘or earlier date dictated by the Commission’s Energy Burden Study (whichever is sooner).’ As a result of the Energy Burden Study, the Commission reduced the applicable energy burden standards and required each utility to make a filing indicating the extent to which each utility intended to comply with the new standards. CAUSE-PA pointed out every natural gas company voluntarily complied except Columbia Gas – even though Columbia Gas settled its last base rate proceeding agreeing to do the same thing.”

Pa. PUC v. Columbia Gas, Recommended Decision, Docket No. R-2020-3018835, at 237-38 (order entered Dec. 4, 2020).

⁶³ Pa PUC v. Columbia Gas of PA, Inc., R-2018-2647577, Joint Pet. for Partial Settlement at p. 15 ¶57. (emphasis added).

⁶⁴ Pa PUC v. Columbia Gas of PA, Inc., R-2018-2647577, CAUSE-PA St. in Support of Joint Pet. for Partial Settlement at p. 7-8.

⁶⁵ Id. (emphasis added).

1 Columbia's current CAP rates are neither just or reasonable and have proven inadequate to
2 ensure that low income consumers can reasonably afford to maintain service to their home. The
3 Commission's revised CAP Policy Statement, sets forth maximum affordable energy burden
4 standards, which are well below the rates charged by Columbia.⁶⁶ The Commission has concluded
5 that, to be considered affordable, CAP rates for natural gas service should not exceed 4% of
6 household income for customers with income at or below 50% FPL and 6% of household income
7 for customers with income between 51-150% FPL.⁶⁷ Columbia currently charges customers
8 enrolled in the PIP payment option 7% of monthly income for customers at or below 110% FPL
9 and 9% for customers between 110 to 150% FPL.⁶⁸ CAP customers receiving Columbia's other
10 CAP rate options regularly receive bills which exceed both the Commission's revised and prior
11 energy burden standards. Indeed, in Columbia's 2018 rate case, when Columbia committed to
12 addressing its energy burdens, there was substantial evidence revealed that hundreds of
13 Columbia's CAP participants who received the Average of Payments, Percent of Bill, and
14 Minimum Payment CAP rates were being charged rates in excess of 10% of their income – and
15 many in excess of 20% of their income - on natural gas service alone.⁶⁹

16 These disproportionate energy burdens make it harder for low income customers to pay for
17 other necessities like food, shelter, and medicine. I recommend that Columbia be required to
18 implement the reduced maximum energy burden standards proposed therein as a condition to
19 approval of any rate increase in this proceeding.

⁶⁶ Final CAP Policy Statement and Order at 4.

⁶⁷ 52 Pa. Code § 69.265(2)(i)(B); see also Final CAP Policy Statement and Order at 4.

⁶⁸ Columbia USECP at 23.

⁶⁹ Pa. PUC v. Columbia, CAUSE-PA Statement 1, the Direct Testimony of Mitchell Miller, Docket No. R-2018-2647577, at Appx. B-27-28, CAUSE-PA to CPA 2-012

1 **Q: Do you have any other recommendations regarding the Company's CAP?**

2 A: Yes. Currently, the Company conducts a bi-annual evaluation of CAP customer bills and
3 makes adjustments to the customer's CAP payment plan to ensure that they are getting the most
4 advantageous rate.⁷⁰ However, this can leave CAP customers paying more than necessary for
5 several months. It has become industry best practices to conduct such an evaluation monthly.⁷¹ I
6 recommend that the Company begin conducting monthly evaluation of CAP customer bills to
7 ensure that customers are receiving the most advantageous CAP rate and should change the CAP
8 payment plan for any customer who is not receiving the most advantageous rate. Columbia should
9 institute this process within 90 days of the effective rates in this proceeding.

10 **b. Low Income Usage Reduction Program (LIURP)**

11 **Q: Will Columbia's Low Income Usage Reduction Program (LIURP) program**
12 **sufficiently mitigate the financial impact of the proposed rate increase on low income**
13 **households?**

14 A: Columbia's LIURP is a critical universal service program designed to improve bill
15 affordability, reduce arrearages and termination rates over the long term, and work in tandem with
16 CAP to help reduce uncontrollably high usage attributable to home energy inefficiencies that low
17 income households cannot afford to address on their own.⁷² Columbia's LIURP program can help
18 mitigate the impact of the proposed rate increase on low income high-use households by installing
19 a range of efficiency and weatherization measures to reduce unnecessarily high usage. But the

⁷⁰ 2019-2021 USECP at 24.

⁷¹ See, e.g., Peoples Gas 2015-2018 Universal Service and Energy Efficiency Program, M-2014-2432515 at 10.

⁷² 52 Pa. Code § 58.1; 2020-2025 USECP at 25.

1 program is not funded in a manner to meet the true need for energy efficiency and weatherization
 2 services.

3 It is also important to note that persistently high rates of inflation for household goods and
 4 services is currently impacting the level of efficiency measures and services provided to
 5 participants. At its April 2022 Universal Services Advisory Council (USAC) meeting, Columbia
 6 reported that LIURP material costs had increased substantially above 2020 levels.⁷³

7 **Table 2: Columbia LIURP Cost Inflations 2020-2022⁷⁴**

Product	2020	2022	Increase
Forced Air furnace 75,000 BTU 95% Efficient	\$3,795	\$4,500	18.6%
Hot Water Boiler 80% Efficient	\$4,500	\$5,950	32.2%
Hot Water Boiler 95% Efficient	\$6,795	\$8,000	17.7%
Hot Water Tank- Direct Vent	\$1,800	\$3,100	72.2%

8
 9 Additionally, Columbia reported that insulation increased up to \$0.30 per square foot,
 10 exterior doors increased up to \$180 apiece, caulking increased up to 18% and sidewall insulation
 11 increased up to 26%.⁷⁵ Thus, – inflation is driving increased overall job costs to perform the same
 12 level of services, and is in turn undermining the ability of LIURP measures to meet requisite cost
 13 effectiveness standards. High inflation may also result in fewer measures being installed in order
 14 to keep overall job costs low. Either way, high and prolonged inflation in pricing for energy

⁷³ See CPA April 2022 USAC Meeting Presentation at Slide 46 (attached hereto as Appendix C).

⁷⁴ Id.

⁷⁵ Id.

1 efficiency and weatherization measures is negatively impacting the level of assistance provided to
2 low income households through LIURP.

3 As a condition to any approved rate increase, and to better protect those most vulnerable
4 to Columbia's substantial proposed rate increase, I recommend that – at a minimum – Columbia
5 should be required to increase its overall LIURP budget by a percentage equal to the percentage
6 increase of any approved residential rate increase. This will help reduce usage – and corresponding
7 bills – for more of Columbia's most vulnerable consumers, while also helping to ensure that
8 LIURP services are undiminished by current economic conditions.

9 **Q: Are there other aspects of Columbia's LIURP that you wish to address?**

10 A: In her direct testimony, Columbia witness Deborah Davis indicates that due to COVID-19
11 shut downs, the Company carried over \$3,857,244 in unspent LIURP funds from 2020 and 2021
12 into its 2022 budget.⁷⁶ She explained that the Company halted all in-home work for several months
13 in 2020 in response to the pandemic and resulted in a drop in production which was slow to resume
14 once the in-home suspension was lifted.⁷⁷ She indicates that the Company's LIURP estimates
15 spending \$6,500,000 in 2022.⁷⁸ She indicates that the Company intends to increase its LIURP
16 production, but that it will take time. As such, Columbia proposes to spread any carryover from
17 2022 evenly over the next three calendar years, 2023 through 2025.⁷⁹

18 **Q: What is your view of the Company's proposal?**

19 A: I am not opposed to Columbia's proposal to spread any remaining LIURP budget from
20 2022 over the following three calendar years, provided Columbia's full budget for each subsequent

⁷⁶ CPA St. 13 at 10.

⁷⁷ Id.

⁷⁸ Id. at 12.

⁷⁹ Id. at 13.

1 year continues to also roll over to the subsequent year in accordance with Columbia’s current
2 practice. I note that this includes any increase in Columbia’s LIURP budget as a result of this rate
3 case, consistent with my recommendation above. As a further caveat, due to the increased LIURP
4 job costs due to inflation that I outlined above, Columbia should amend its LIURP spending plan
5 to provide for the possibility that it may need to draw from those funds earlier than expected.

6 In turn, Columbia should be required to fully explain the reasons driving any
7 underspending in subsequent years, and should set forth a plan – subject to Commission review
8 and stakeholder input – for how it will improve spending to better meet the well documented and
9 overwhelming need for energy efficiency and weatherization services in Columbia’s service
10 territory.

11 Indeed, while I recognize that Columbia has a substantial budget remaining from the 2020
12 work stoppages, that fact should not work to the detriment of low income households – who have
13 already suffered disproportionately harmful impacts associated with the pandemic.⁸⁰ If a utility is
14 unable to provide a level of services to meet documented need with the budgets allocated for that
15 purpose, low income households should not suffer the consequences in terms of reduced program
16 services and funding in addition to being exposed to potential rate increases. Rather, the utility
17 should be required to take steps to fully expend all allocated budgets. That logic applies here: If
18 Columbia is unable to fully expend its allocated LIURP budgets, those budgets should remain
19 available to serve the needs of low income households once it is able to resolve the external factors
20 driving its inability to meet LIURP production goals.

⁸⁰ See, e.g., Center on Budget and Policy Priorities, Tracking the COVID-19 Economy’s Effects on Food, Housing, and Employment Hardships (Feb. 2022).

1 Given Columbia believes it will be able to ramp up LIURP production through 2022 to
2 meet a spending goal of \$6.5 million, it is clearly not concerned about a lack of need – or its ability
3 to sustain higher production levels in subsequent years.

4 **III. ENERGY EFFICIENCY AND CONSERVATION PLAN**

5 **Q: Please describe the aspects of Columbia’s proposed Energy Efficiency and**
6 **Conservation (EE&C) programs that you wish to address.**

7 A: Columbia is proposing to implement two energy efficiency programs designed to help
8 residential customers reduce their energy consumption, improve efficiency, and conserve
9 resources.⁸¹ The Plan is projected to provide lifetime savings of 3.3 million dekatherms (“Dths”)
10 of natural gas at a cost of \$8.1 million over three years.⁸² The Company anticipates that programs
11 will be available to customers approximately six to nine months after approval of the Plan,
12 approximately mid-2023.⁸³

13 The Plan has two programs, the Residential Prescriptive (RP) Program, which provides
14 equipment rebates and the Online Audit Kit (“OAK”) Program.⁸⁴ The RP program will provide
15 rebates for furnaces, boilers, combination space and water heating boilers (“combi boilers”),
16 tankless water heaters, and WIFI-enabled thermostats.⁸⁵ The OAK Program will provide
17 customers with a free online audit that will provide targeted information for customers on how to
18 reduce their energy usage and bills and will provide customers with free, targeted energy savings
19 kits.⁸⁶

20

⁸¹ CPA St. 16 at 3.

⁸² Id.

⁸³ Id. at 10.

⁸⁴ Id. at 3.

⁸⁵ Id. at 10

⁸⁶ Id. at 12.

1 **Q: How does Columbia’s proposed Energy Efficiency and Conservation Plan address**
2 **low income populations?**

3 A: The program does not specifically address low income customers. Columbia witness
4 Theodore Love explains:

5 Low-income customers are allowed to participate in any of the programs, but the
6 Plan does not specifically include participation assumptions for this market. The
7 OAK program does provide a free online audit and will mail targeted low-cost
8 energy saving kits to customers at no cost. However, the majority of services
9 offered by the Company for assisting low-income customers with their energy bills
10 are still through existing pathways, such as the Low Income Usage Reduction
11 Program (“LIURP”).

12 Columbia models its proposed programming on Act 129 energy efficiency and conservation
13 programming.⁸⁷ However, the plan overlooks a major component of Act 129: The recognition that
14 low income customers are unable to access most residential programs because the upfront cost of
15 participation is prohibitive.⁸⁸ In Phase IV of Act 129, the Commission required electric companies
16 create programming for low income customers capable of producing 5.8% of its overall savings.⁸⁹
17 The EDCs implement both LIURP programs and Act 129 low income programs, which makes
18 sense given that the eligibility criteria are different for the Act 129 low income programs and
19 LIURP. This is not only logical, it is also a statutory requirement within Act 129.⁹⁰

⁸⁷ CPA St. 16 at 7-8.

⁸⁸ See 66 Pa. C.S. § 2806.1(b)(i)(G).

⁸⁹ Energy Efficiency and Conservation Program, Phase IV Implementation Order, Docket M-2020-3015228, at 36 (June 18, 2020).

⁹⁰ See 66 Pa. C.S. § 2806.1(b)(i)(G) (“The plan shall include specific energy efficiency measures for households at or below 150% of the Federal poverty income guidelines. The number of measures shall be proportionate to the households’ share of the total energy usage in the service territory. The electric distribution company shall coordinate measures under this clause with other programs administered by the commission or another Federal or State agency. The expenditures of an electric distribution company under this clause shall be in addition to expenditures made under 52 Pa. Code Ch. 58 (relating to residential low income usage reduction programs).”).

1 **Q: Do you have any concerns about Columbia’s lack of targeted low income programs**
2 **in its EE&C Plan?**

3 A: Yes. The reliance of the program on rebate incentives and the inelasticity of household
4 income for those living in poverty means that low income customers are unable to meaningfully
5 participate in the EE&C programming to derive comprehensive and quantifiable savings. Yet most
6 low income customers (those not enrolled in CAP) will pay Columbia’s proposed Energy
7 Efficiency Rider to support the program through rates.

8 As proposed, the Company would be implementing energy efficiency programs that will
9 not reach low income customers who are most burdened by higher rates, and are least able to afford
10 to adopt energy efficiency measures on their own. Low income customers, who already face
11 unreasonable energy burdens by paying a disproportionate share of their incomes for energy costs,
12 will receive no relief through the voluntary energy efficiency programming programs proposed by
13 the Company - but will still be required to pay the added cost of the Company’s programs through
14 rates. It is unjust and unreasonable to force these financially struggling customers to pay for a
15 program from which they are unable to derive a benefit.

16 **Q: Do you have recommendations about how Columbia can adjust it’s EE&C program**
17 **to provide a benefit to low income customers?**

18 A: Yes. I recommend the Commission require Columbia to revise its Plan to include a targeted
19 low income energy efficiency program designed to serve the unique needs and financial
20 circumstances of customers whose annual household income is equal to or less than 200% of FPL
21 that would be complimentary to its LIURP programs. The program should be funded using 11.4%
22 of the proposed program budget for the residential customer class, given that 11.4% of residential

1 customers are confirmed low income, but not enrolled in CAP and thus will be required to pay the
2 proposed Company's proposed Energy Efficiency Rider.⁹¹

3 In designing a low income customer program within its EE&C Plan, Columbia should
4 target low income customers who are ineligible for LIURP because they do not meet the minimum
5 usage threshold. Programming should also specifically target measures to low income residential
6 tenants, who are often unable to access comprehensive energy efficiency programming due to
7 landlord noncooperation. Low income households should be provided with prescriptive efficiency
8 measures and direct installation at no cost. Applicants who are income eligible for LIURP but are
9 denied because they do not meet the minimum usage threshold should be provided a warm referral
10 to the EE&C administrator.

11 **Q: Are there ways that Columbia can better coordinate its proposed EE&C program**
12 **with its LIURP program?**

13 A: Yes. In response to discovery, Columbia indicates that it plans to integrate programming
14 between its LIURP, Audit and Rebates program, and the proposed EE&C programs as much as
15 possible through customer referrals and comarketing of program activity.⁹² Columbia does not
16 seem to have a plan for how to carry out this referral process.

17 I recommend that Columbia be required to inquire as to the income status of all EE&C
18 applicants and that low income customers seeking information about the EE&C program should
19 be provided with a warm transfer to Columbia's LIURP and other universal service programs.
20 Consumers do not typically volunteer information about their household income unless prompted.
21 While customers may wish to opt out of providing income information when asked, they should

⁹¹ CPA St. 6 at 42; See also CAUSE-PA to CPA I-1, I-3, I-4 (As of April 2022, CPA reports 409,839 residential, 71,740 confirmed low income, and 25,095 CAP customers.).

⁹² CAUSE-PA to CPA II-9.

1 nevertheless be given the opportunity to provide income information to see if they are eligible for
2 free services – either through LIURP, the low income EE&C program I recommend above, or
3 Columbia’s other available universal service programs. By implementing this warm referral
4 process, Columbia can help ensure that low income customers are identified and referred to
5 programs that will best fit their needs.

6 **Q: Are there other ways that Columbia can improve it’s LIURP program based on its
7 EE&C program?**

8 A: Yes. There are two measures that the LIURP program currently does not offer that are
9 covered by Columbia’s proposed Residential Prescriptive program: tankless water heaters and
10 smart thermostats.⁹³ These are valuable measures that could help low income customers reduce
11 their usage and improve their quality of life. I recommend that Columbia include these measures
12 in its LIURP program as well.

13 **IV. RATE DESIGN**

14 **Q: Please describe the aspects of Columbia’s residential rate design proposal that you
15 wish to address.**

16 A: Columbia proposes to increase the monthly residential customer charge by over 52% from
17 \$16.75 to \$25.47, a monthly increase of \$8.72 – or \$104.64 annually.⁹⁴ Columbia is also proposing
18 the implementation of a Revenue Normalization Adjustment (“RNA”) for the residential class in
19 this case.⁹⁵

⁹³ CAUSE-PA to CPA II-7.

⁹⁴ CPA St. 6 at 23.

⁹⁵ CPA St. 6 at 29.

1 **Q: How would Columbia’s proposed rate design impact low income households?**

2 A: This level of increase to the fixed charge will undermine the ability for consumers to
3 control costs through energy efficiency, conservation, and consumption reduction (including the
4 \$8.1 million investment in energy efficiency Columbia is proposing in this case). This is
5 particularly problematic for low income customers. These customers already struggle profoundly
6 to pay for natural gas service, and rely on the ability to offset high bills through careful
7 conservation and usage reduction. Regardless of the level of household usage, any increase to the
8 fixed charge erodes the ability of consumers to effectively deploy conservation measures to offset
9 that portion of the rate increase.

10 **Q: Would Columbia’s proposed increase to the fixed charge affect the Company’s**
11 **LIURP program and its proposed EE&C programs?**

12 A: Yes. Columbia’s proposal undermines the explicit goals of the Low income Usage
13 Reduction Program (LIURP). It will also reduce the benefits of Columbia’s proposed EE&C
14 program by undermining the customer’s ability to achieve bill savings through adoption of energy
15 efficiency measures.

16 The Commission’s LIURP regulations explicitly provide that the program is intended to
17 help low income customers to reduce their *bills* and, in turn, to “decrease the incidence and risk of
18 customer payment delinquencies and the attendant utility costs associated with uncollectible
19 accounts expense, collection costs and arrearage carrying costs.”⁹⁶ By reducing the amount of bill

⁹⁶ 52 Pa. Code § 58.1 (“The programs are intended to assist low income customers conserve energy and reduce residential energy bills. The reduction in energy bills should decrease the incidence and risk of customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs.”).

1 savings that can be obtained through LIURP participation, the proposed increase to the fixed
2 charge threatens the continued effectiveness of ratepayer investments intended to reduce energy
3 consumption, delinquencies, collections, and uncollectible costs. The explicit goals of the program
4 will be more difficult to achieve as the fixed portion of the bill is increased.

5 LIURP is effective at achieving these goals and producing meaningful average bill savings.
6 In 2018, the last year for which industry wide data is available, LIURP saved participants an
7 average of \$304 per year – or \$25.33 per month.⁹⁷ The ability to save money through energy
8 efficiency is tied directly to a bill structure that bases costs on throughput. But as more residential
9 customer costs are shifted to the fixed charge, the achievable bill savings – and the corresponding
10 impact on bill payment behavior – will erode.

11 This is even more critical for households with income above 150% FPL but less than 200%
12 FPL who are ineligible for CAP or LIHEAP but are eligible for energy efficiency and conservation
13 services through LIURP or the federal Weatherization Assistance Program (WAP) – both of which
14 have income guidelines of up to 200% FPL. It is critical that these households retain the ability to
15 reduce their monthly energy costs through adoption of comprehensive energy efficiency and
16 conservation programming.

17 Likewise, customers who choose to take advantage of the company’s proposed EE&C
18 program will not experience the same level of bill savings from energy efficiency measures that
19 they would experience if the full increase were placed on the volumetric charge.

⁹⁷ 2020 Universal Service Report at 57 (Estimated annual bill reductions are based on the average of the public utility results from each category of LIURP jobs completed in the program year, evaluated in following year, and reported in the year after that.).

1 Given low income households are disproportionately payment troubled, and often lack the
2 ability to reasonably control usage due to poor housing stock and older, less efficient appliances,⁹⁸
3 it is critical that they continue to have access to effective conservation tools capable of producing
4 meaningful and lasting bill reductions. Of course, in addition to undermining the effectiveness of
5 millions of dollars in LIURP investments, Columbia’s high fixed charge proposal will also
6 undermine the bill savings achievable through the millions of ratepayer dollars that the Company
7 is proposing to invest in energy efficiency through its voluntary Energy Efficiency and
8 Conservation Program Plan.

9 **Q: Do you have any recommendations that could help mitigate the effect of the proposed**
10 **rate design on low income households?**

11 A: Yes. Columbia’s fixed monthly customer charges should not be increased. To the extent
12 any increase in the Company’s residential distribution rate is approved, it should be applied to the
13 volumetric charge. This would protect the ability of low income households to lower their utility
14 costs by reducing consumption and would preserve the effectiveness of the LIURP program at
15 reducing customer bills and improving payment behavior.

16 **Q: Are there any other aspects of Columbia’s proposed rate structure that you would**
17 **like to address?**

18 A: Yes. Columbia has proposed a Revenue Normalization Adjustment Rider (Rider RNA),
19 which is designed to “break the link” between residential non-gas revenue received by the

⁹⁸ See ACEEE, Lifting the High Energy Burden in America’s Largest Cities: How Energy Efficiency Can Improve Low income and Underserved Communities (April 2016), <https://www.aceee.org/sites/default/files/publications/researchreports/u1602.pdf>.

1 Company and gas consumed by non-CAP residential customers.⁹⁹ The RNA proposed by
2 Columbia provides benchmark distribution revenue levels regardless of changes in customers'
3 actual usage levels and would adjust actual non-gas distribution revenue for the non-CAP
4 residential customer class.¹⁰⁰ Essentially, Rider RNA would allow Columbia to collect its revenue
5 on a per customer basis – rather than on a usage basis.¹⁰¹

6 **Q: Do you support Columbia's Rider RNA proposal?**

7 A: No. I believe that Columbia's Rider RNA should be rejected. For the same reasons
8 discussed at length above with regard to the fixed charge, I oppose implementation of Columbia's
9 Rider RNA. In short, and without unnecessarily repeating my previous arguments, recovering
10 revenue on a per customer basis, rather than a usage basis, strips low income households of the
11 ability to control their bill through usage reduction and conservation efforts, and undermines the
12 effectiveness of the Low income Usage Reduction Program and other weatherization and energy
13 efficiency programs at reducing low income customer bills. As such, the proposed Rider RNA will
14 potentially have a disproportionately negative impact on low income consumers. While it may
15 appear to the consumer that they have successfully reduced their energy costs over the short term,
16 the practical effect of the Rider RNA will be to charge the consumer the difference on the back
17 end – six months to a year later.

18 While Columbia has proposed to exclude CAP customers from Rider RNA,¹⁰² this does
19 not remediate my concern that Rider RNA will negatively impact the many non-CAP low income
20 consumers and will undermine the effectiveness of LIURP at reducing customer bills. As I have

⁹⁹ CPA St. 6 at 29.

¹⁰⁰ Id.

¹⁰¹ Id.

¹⁰² Id. at 39.

1 previously explained, roughly 65-74% of Columbia’s confirmed low income customers are not
2 enrolled in CAP.¹⁰³ These consumers will not be shielded from the impact of Rider RNA, and –
3 as addressed above, given current enrollment levels - it is not reasonable to conclude that these
4 consumers will simply be able to enroll in CAP to avoid the Rider RNA.

5 **Q: If Rider RNA were approved, do you have any recommendations to mitigate the**
6 **impact on low income customers?**

7 A: Yes. If Rider RNA is ultimately approved, Columbia should be required to exempt all
8 confirmed low income customers from the charge. In all bills in which an RNA is utilized,
9 Columbia should be required to notify the customer on the bill that they may be exempted from
10 the RNA by contacting the Company and demonstrating their low income status in the same
11 manner as they would demonstrate eligibility for CAP.

12 **V. LOW INCOME CUSTOMER SERVICE METRICS**

13 **Q: Do you recommend other customer service metrics that are not related to Universal**
14 **Service Programs or other programs proposed by the Company?**

15 A: Yes. I have discussed in detail the importance of remediating the effect of the proposed
16 rate increase through improvements to CAP, LIURP, and other established programs. I believe the
17 recommendations I have made are essential to improving Columbia’s low income customer
18 services and better enabling its low income customer base to receive service based upon more just
19 and reasonable rates. Each of these programs, individually, and in coordination with each other, is
20 vital to achieving the desired outcomes. At the heart of each of these programs is the underlying

¹⁰³ See CAUSE-PA to CPA I-2, I-3, I-7.

1 and polestar goals of reducing low income customer payment troubled status, reducing service
2 terminations, and expediting service reconnection.

3 However, as I have detailed, low income customers continue to be subject to involuntary
4 terminations at far higher rates than the general residential customer base. Low income customers
5 continue to be payment troubled at far greater rates than the general residential customer base; and
6 low income customers continue to be without service for longer periods of time than other
7 customers in the general residential customer base. We need to do a better job at narrowing and
8 potentially eliminating these differences.

9 As I have noted, the differences are measurable and significant. In the face of these
10 differences, Columbia has nevertheless requested a rate increase that will negatively affect a
11 significant portion of its customer base. Columbia is requesting a rate increase in spite of the fact
12 that it is achieving far different results for its low income customers, who are not receiving the
13 same level of continuous service as the general residential base.

14 I therefore recommend that Columbia be required to significantly lower the payment
15 troubled and termination rates for its confirmed low income customers. The baseline level should
16 be the difference between residential and confirmed low income payment troubled and termination
17 rates reported to BCS for 2019, the year predating the pandemic and the implementation of
18 emergency measures. Columbia should be held accountable for narrowing the gap in each of these
19 categories by 5% per year. To the extent that it fails to close the gap and lessen the disparity in
20 termination rates, there should be an objective decrease to any future proposed residential rate
21 increase by the percentage of failure. For example, if the gap in terminations is reduced by only
22 3%, any future residential rate increase should be reduced by 2%.. The sum of any failure to reduce

1 the gap between residential and low income customers in these two baseline categories – payment
2 troubled and termination rates – will be the resultant percentage decrease in any subsequent
3 requested rate increase.

4 **VI. SUMMARY OF RECOMMENDATIONS**

5 **Q: Please summarize your recommendations.**

6 A: As I noted from the outset of my testimony, I do not believe that Columbia’s proposed rate
7 increase should be granted unless specific and immediate measures are taken to address
8 unaffordability of service for low income consumers. I made several recommendations throughout
9 my testimony to address current levels of unaffordability and mitigate the financial impact of any
10 approved rate increase on low income households. Specifically, I recommend the following:

- 11 • That Columbia institute an income screening process to better identify and serve its low
12 income customers.
- 13 • That Columbia screen all new and moving customers for income level at the time their
14 service is established.
 - 15 ○ Columbia should routinely screen existing customers for income on any
16 non-emergency calls, and/or should inquire whether there has been any
17 update to their income information already noted in their account. Upon
18 establishing an online account, and once annually thereafter, customers
19 should be given the opportunity to voluntarily self-disclose any changes
20 to their income information.
- 21 • That Columbia establish benchmarking goals for its CAP enrollment based on the
22 percentage of its estimated low income customers. Specifically, Columbia should strive

- 1 to increase its CAP enrollment by a minimum 5% each year as a percentage of its
2 estimated low income customers.
- 3 • That Columbia permanently adopt its policy of allowing income verification
4 documentation that was not previously accepted for CAP enrollment
 - 5 • That Columbia be required to reduce its maximum energy burden standards to match the
6 Commission’s policy statement as a condition to approval of any rate increase in this
7 proceeding.
 - 8 • That – at a minimum – Columbia should be required to increase its overall LIURP budget
9 by a percentage equal to the percentage increase of any approved residential rate increase.
 - 10 • That the Commission require Columbia to revise its EE&C Plan to include a targeted low
11 income energy efficiency program designed to serve the unique financial circumstances
12 of low income customers, with a budget equal to 11.4% of the residential customer
13 program budget – consistent with the estimated percentage of low income customers in
14 Columbia’s service territory.
 - 15 • That Columbia inquire as to the income status of all EE&C applicants and that low
16 income customers seeking information about the EE&C program should be provided with
17 a warm transfer to Columbia’s LIURP and other universal service programs.
 - 18 • That Columbia include tankless water heaters and smart thermostats in its LIURP
19 measures
 - 20 • That Columbia’s residential fixed customer charge not be increased.
 - 21 • That Columbia’s proposed RNA be rejected.
 - 22 • Columbia should be required to reduce the gap between its residential and confirmed low
23 income payment troubled and termination rates by at least 5% per year, and should be

1 subject to an objective decrease to any future proposed residential rate increase if they fail
2 to improve these critical low income customer metrics.

3 **Q: Does this conclude your direct testimony?**

4 **A: Yes.**

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX A

RESUME OF HARRY S. GELLER

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:

Harpur College, State University of New York at Binghamton, B.A. 1966

Washington College of Law, American University, J.D. 1969

New York University Law School, courses in Urban Affairs and Poverty Law, as part of
Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:

1988 – 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council
Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS

New York State

Commonwealth of Pennsylvania

United States District Court, Middle District of Pennsylvania

Cases in which Harry S. Geller has participated as a witness before the Pennsylvania Public Utility Commission since July 1, 2015

- Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division, R-2021- 3030218.
- Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the Period Commencing June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385, R- 2021-3027386.
- Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021- 3024750.
- Pennsylvania Public Utility Commission v. PECO Energy – Electric Division, R-2021-3024601.
- Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
- Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
- Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31 , 2025, Docket No. P-2020-3019356.
- Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
- Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
- Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R2018-3003558 et seq.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
- Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
- Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
- Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.

- PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
- Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
- Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.
- Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company,
- Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.
- Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX B

CITED DISCOVERY RESPONSES

Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) to Columbia Gas of Pennsylvania (CPA)

CAUSE-PA to CPA Set I

CAUSE-PA to CPA I-1.
CAUSE-PA to CPA I-2.
CAUSE-PA to CPA I-3.
CAUSE-PA to CPA I-4, Attachment A.
CAUSE-PA to CPA I-5.
CAUSE-PA to CPA I-6.
CAUSE-PA to CPA I-7.
CAUSE-PA to CPA I-8.
CAUSE-PA to CPA I-10, Attachment A.
CAUSE-PA to CPA I-14.
CAUSE-PA to CPA I-15.
CAUSE-PA to CPA I-16.
CAUSE-PA to CPA I-22.

CAUSE-PA to CPA Set II

CAUSE-PA to CPA II-1, Attachment A.
CAUSE-PA to CPA II-2, Attachment A.
CAUSE-PA to CPA II-3, Attachment A.
CAUSE-PA to CPA II-7.
CAUSE-PA to CPA II-9.

Office of Consumer Advocate (OCA) to Columbia Gas of Pennsylvania (CPA)

OCA to CPA III-6, Attachment C.

Question No. CAUSE-PA 1-001
Respondent: D. Davis
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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1**

Question No. CAUSE-PA 1-001:

From January 2019 to the most recent available date, disaggregated by month and year, how many residential customers did Columbia have?

Response:

Please see the chart below provides the number of residential customers by month & year since January 2019.

	2019	2020	2021	2022
Jan	400,835	403,973	408,607	411,186
Feb	401,135	404,214	408,888	410,539
Mar	401,310	404,447	408,939	410,602
Apr	400,416	404,687	409,320	409,839
May	399,272	404,910	407,730	
Jun	398,404	405,186	406,476	
Jul	397,732	405,487	406,184	
Aug	397,604	405,794	406,232	
Sep	398,046	406,312	406,503	
Oct	400,099	407,011	407,413	
Nov	402,307	407,615	408,727	
Dec	403,359	408,198	409,683	

Question No. CAUSE-PA 1-002
Respondent: D. Davis
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Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-002:

From January 2019 to the most recent available date, disaggregated by month and year, how many estimated low-income customers reside within Columbia service territory? Please explain how Columbia arrived at its estimated figures and include citation and/or copies of all workpapers used to perform the estimation.

Response:

The Company is required to provide an annual estimation of low-income customers as part of the Universal Service Reporting Requirements (USRR). The Company does not recalculate the estimated low-income count on a monthly basis. The Bureau of Consumer Services (BCS) was unable to gather most recent census data and requested the Company not report an estimate of low income with the 2021 USRR reported in March 2022. This will be completed at a later date when the information is available.

The Company utilizes census data by county provided by the BCS and attributes the same percentage of its total residential customer base per county to the low-income census counts provided by census data. In 2019, the Company reported 97,268 estimated low-income customers in its territory. In 2020, the Company reported 96,648 estimated low-income customers in its territory. Please see Attachment A to this request for the work papers used to estimate the low-income customers residing in the Company's service territory for years 2019 and 2020.

Estimate of Low-Income Customers by County

2019

County	Customer Count	Census Household	Percent Customers CPA	Census Household Low-Income	Low-Income CPA
Adams	14129	39,221	36.02%	7982	2,875
Allegheny	101324	537,960	18.83%	129562	24,403
Armstrong	863	27,990	3.08%	7624	235
Beaver	35464	70,817	50.08%	17128	8,577
Bedford	12	19,674	0.06%	6062	4
Butler	9374	76,240	12.30%	13797	1,696
Centre	13029	57,908	22.50%	17751	3,994
Clarion	3559	15,824	22.49%	5187	1,167
Clearfield	0	31,349	0.00%	10307	0
Elk	31	13,727	0.23%	3139	0
Fayette	22145	54,511	40.62%	19090	7,755
Franklin	4639	60,210	7.70%	14933	1,151
Fulton	4	5,950	0.07%	1548	1
Greene	2700	14,211	19.00%	3858	733
Indiana	555	33,892	1.64%	12065	198
Jefferson	353	18,465	1.91%	5653	108
Lawrence	18144	36,907	49.16%	10801	5,310
McKean	3154	17169	18.37%	5930	1,089
Mercer	29	46028	0.06%	13118	8
Somerset	4713	29708	15.86%	5831	925
Venango	680	21915	3.10%	6742	209
Warren	2371	17080	13.88%	4590	637
Washington	42563	84100	50.61%	18422	9,323
Westmoreland	20760	151665	13.69%	33178	4,541
York	100593	171244	58.74%	38009	22,327
					97,268

Estimate of Low-Income Customers by County

2020

County	Customer Count	Census Household	Percent Customers CPA	Census Household Low-Income	Low-Income CPA
Adams	14334	39345	36.43%	7472	2,722
Allegheny	102161	541541	18.86%	125605	23,695
Armstrong	865	28137	3.07%	7595	233
Beaver	35761	71167	50.25%	17225	8,655
Bedford	12	19882	0.06%	5731	3
Butler	9525	76502	12.45%	13749	1,712
Centre	13372	58201	22.98%	17854	4,102
Clarion	3578	16021	22.33%	5513	1,231
Clearfield	0	31248	0.00%	9821	0
Elk	31	14020	0.22%	3256	0
Fayette	22416	54837	40.88%	18649	7,623
Franklin	4680	60438	7.74%	14056	1,088
Fulton	4	5989	0.07%	1540	1
Greene	2717	14230	19.09%	3869	739
Indiana	557	33246	1.68%	11504	193
Jefferson	357	18427	1.94%	5916	115
Lawrence	18308	37055	49.41%	11007	5,438
McKean	3170	17147	18.49%	5568	1,029
Mercer	29	46340	0.06%	12862	8
Somerset	4761	29644	16.06%	8274	1,329
Venango	690	22050	3.13%	6442	202
Warren	2381	17115	13.91%	4645	646
Washington	43264	84948	50.93%	18063	9,199
Westmoreland	20875	152283	13.71%	32649	4,476
York	102244	172421	59.30%	37449	22,207
					96,648

Question No. CAUSE-PA 1-003

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES**

Set 1

Question No. CAUSE-PA 1-003:

From January 2019 to the most recent available date, disaggregated by month and year, how many of Columbia customers were/are categorized as “confirmed low income”? Please explain how Columbia categorizes customers as confirmed low income, what categories of customers are included in Columbia’s count of confirmed low income customers, and include citation and/or copies of all workpapers used to perform the calculation.

Response:

Please see the chart below for the number of confirmed low income by month and year since January 2019. The Company considers any customers with active service that has most recently self- declared or verified income information on the Company’s information system as level 1 (150% of FPIG or less). The information is provided from a monthly report taken directly from the Company’s information system. The Company is unable to provide any work papers related to the calculation as it is an automated process.

Question No. CAUSE-PA 1-003

Respondent: D. Davis

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	2019	2020	2021	2022
Jan	69,521	66,999	68,430	69,179
Feb	69,759	68,115	69,493	72,394
Mar	69,727	68,293	69,583	72,448
Apr	69,138	68,448	69,554	71,740
May	68,127	68,534	68,669	
Jun	67,716	68,382	67,877	
Jul	66,887	68,059	67,283	
Aug	65,676	68,049	67,093	
Sep	65,586	67,790	66,755	
Oct	65,668	67,811	66,917	
Nov	66,346	67,993	67,886	
Dec	66,833	68,457	68,480	

Question No. CAUSE-PA 1-004

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES**

Set 1

Question No. CAUSE-PA 1-004:

From January 2019 to the most recent date available, how many of Columbia's customers were/are enrolled in CAP, disaggregated by month, year, and payment plan type?

Response:

Please see Attachment A to this request for the requested data.

Year	Month	Pymt Plan Option	# of Customers
2019	1	1	4764
2019	1	2	3778
2019	1	3	14014
2019	1	4	2232
2019	2	1	4104
2019	2	2	3235
2019	2	3	12151
2019	2	4	1839
2019	3	1	4492
2019	3	2	3421
2019	3	3	13347
2019	3	4	2046
2019	4	1	4522
2019	4	2	3347
2019	4	3	13578
2019	4	4	2116
2019	5	1	4916
2019	5	2	3461
2019	5	3	14807
2019	5	4	2392
2019	6	1	4140
2019	6	2	2909
2019	6	3	12620
2019	6	4	2020
2019	7	1	4788
2019	7	2	3211
2019	7	3	14512
2019	7	4	2381
2019	8	1	4509
2019	8	2	2951
2019	8	3	13654
2019	8	4	2228
2019	9	1	4214
2019	9	2	2712
2019	9	3	12772
2019	9	4	2064
2019	10	1	4507
2019	10	2	2874
2019	10	3	13854
2019	10	4	2212
2019	11	1	4101
2019	11	2	2516
2019	11	3	12141
2019	11	4	1973

2019	12 1	3981
2019	12 2	2423
2019	12 3	12026
2019	12 4	1920
2020	1 1	4725
2020	1 2	2760
2020	1 3	14039
2020	1 4	2285
2020	2 1	4038
2020	2 2	2358
2020	2 3	12143
2020	2 4	1947
2020	3 1	4800
2020	3 2	2708
2020	3 3	14319
2020	3 4	2361
2020	4 1	4611
2020	4 2	2579
2020	4 3	13869
2020	4 4	2299
2020	5 1	4417
2020	5 2	2455
2020	5 3	13261
2020	5 4	2278
2020	6 1	4654
2020	6 2	2574
2020	6 3	14056
2020	6 4	2421
2020	7 1	4661
2020	7 2	2585
2020	7 3	14214
2020	7 4	2455
2020	8 1	4549
2020	8 2	2492
2020	8 3	13661
2020	8 4	2408
2020	9 1	4541
2020	9 2	2487
2020	9 3	13625
2020	9 4	2414
2020	10 1	4891
2020	10 2	2643
2020	10 3	14641
2020	10 4	2598
2020	11 1	4083
2020	11 2	2224
2020	11 3	12133

2020	11	4	2189
2020	12	1	4537
2020	12	2	2480
2020	12	3	13694
2020	12	4	2471
2021	1	1	4433
2021	1	2	2454
2021	1	3	13379
2021	1	4	2432
2021	2	1	4228
2021	2	2	2365
2021	2	3	12769
2021	2	4	2354
2021	3	1	5137
2021	3	2	2899
2021	3	3	15400
2021	3	4	2911
2021	4	1	4691
2021	4	2	2689
2021	4	3	14056
2021	4	4	2706
2021	5	1	4579
2021	5	2	2700
2021	5	3	13699
2021	5	4	2695
2021	6	1	4827
2021	6	2	2910
2021	6	3	14389
2021	6	4	2887
2021	7	1	4718
2021	7	2	2868
2021	7	3	13928
2021	7	4	2877
2021	8	1	4817
2021	8	2	2990
2021	8	3	14306
2021	8	4	3007
2021	9	1	4679
2021	9	2	2918
2021	9	3	13690
2021	9	4	2974
2021	10	1	4679
2021	10	2	2946
2021	10	3	13563
2021	10	4	3059
2021	11	1	4562
2021	11	2	2882

2021	11	3	13013
2021	11	4	3031
2021	12	1	4573
2021	12	2	2936
2021	12	3	13166
2021	12	4	3164
2022	1	1	4731
2022	1	2	3038
2022	1	3	13553
2022	1	4	3356
2022	2	1	4424
2022	2	2	2888
2022	2	3	12594
2022	2	4	3202
2022	3	1	5355
2022	3	2	3547
2022	3	3	15258
2022	3	4	4035
2022	4	1	4772
2022	4	2	3267
2022	4	3	13427
2022	4	4	3630

Question No. CAUSE-PA 1-005

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES**

Set 1

Question No. CAUSE-PA 1-005:

As of the most recent date available, what is the average annual income of Columbia's currently identified confirmed low income customers?

Response:

The average annual income of Columbia's currently identified confirmed low-income customers is \$15,133.73

Question No. CAUSE-PA 1-006

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
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Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES

Set 1

Question No. CAUSE-PA 1-006:

As of the most recent date available, what is the average annual income of Columbia's currently enrolled CAP customers?

Response:

The average annual income of Columbia's currently enrolled CAP customers is \$14,673.73.

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

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COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-007:

From January 2019 to the most recent date available, what was the average energy burden of CAP customers (including any arrearage forgiveness co-payment or any other additional fee or charge above the average bill), disaggregated by month, income level (0-50%, 51-100%, and 101-150% of the federal poverty level), and payment plan type?

Response:

The Company does not store income on a monthly basis. It is overwritten during the year and saved once a year. Therefore, monthly data will not be accurate. Please see the chart below for the data requested that can be provided. The Company included April 2021 when the last request was completed, December 2021 and April 2022 (current). Customers with zero income or on the minimum payment are not included.

		2019	2020	Apr-21	Dec-21	Apr-22
% of Income	1 to 50	7.64%	7.76%	7.56%	7.08%	7.04%
	51 to 100	7.40%	7.32%	7.38%	6.94%	6.98%
	101 to 150	8.02%	7.52%	8.00%	7.51%	7.76%
Avg of Payments	1 to 50	5.34%	5.28%	5.10%	4.73%	4.64%
	51 to 100	4.20%	4.16%	4.08%	3.63%	3.50%
	101 to 150	2.92%	3.05%	2.89%	2.39%	2.27%
% of Bill	1 to 50	5.24%	5.72%	5.31%	5.27%	5.23%
	51 to 100	5.02%	4.50%	4.50%	4.18%	4.17%
	101 to 150	3.44%	3.28%	3.28%	2.96%	3.00%

Question No. CAUSE-PA 1-008

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

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**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES**

Set 1

Question No. CAUSE-PA 1-008:

As of the most recent date available, what percentage of Columbia's payment troubled customers were confirmed low income customers?

Response:

As of the end of December 2021, 61.17% of Columbia's payment troubled customers were confirmed low-income customers.

Question No. CAUSE-PA 1-010
Respondent: D. Davis
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Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
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COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-010:

From January 2019 to the most recent date available, disaggregated by month and year, please provide:

- a. the number of residential customers in debt
- b. the number of confirmed low-income customers in debt
- c. the percentage of residential customers in debt
- d. the percentage of confirmed low-income customers in debt
- e. the dollars in debt for residential customers
- f. the dollars in debt for confirmed low-income customers
- g. the percent of dollars owed that are on a payment arrangement for residential customers
- h. the percent of dollars owed that are on a payment arrangement for confirmed low-income customers
- i. the average arrearage for residential customers
- j. the average arrearage for confirmed low-income customers

Response:

Please see Attachment A to this response for the requested data.

	(a) The number of residential customers in debt	(b) The number of confirmed low-income customers in debt	(c) The percentage of residential customers in debt	(d) The percentage of confirmed low income customers in debt	(e) The dollars in debt for residential customers	(f) The dollars in debt for confirmed low-income customers	(g) The percent of dollars owed that are on a payment arrangement for residential customers	(h) The percent of dollars owed that are on a payment arrangement for confirmed low-income customers	(i) The average arrears for residential customers	(j) The average arrears for confirmed low-income customers
2019 January	26,170	11,807	6.53%	16.98%	\$ 16,621,942	\$ 8,163,421	61.29%	69.43%	\$ 635.15	\$ 691.41
February	26,767	12,374	6.67%	17.74%	\$ 20,879,685	\$ 10,083,003	65.01%	72.35%	\$ 780.05	\$ 814.85
March	26,223	11,357	6.53%	16.29%	\$ 23,088,995	\$ 10,808,430	71.10%	79.22%	\$ 880.49	\$ 951.70
April	26,540	11,198	6.63%	16.20%	\$ 21,913,644	\$ 9,914,366	77.01%	85.44%	\$ 825.68	\$ 885.37
May	30,878	11,835	7.73%	17.37%	\$ 19,960,802	\$ 8,880,108	77.88%	86.70%	\$ 646.44	\$ 750.33
June	28,692	11,027	7.20%	16.28%	\$ 15,510,847	\$ 7,289,392	85.71%	90.84%	\$ 540.60	\$ 661.05
July	31,267	11,334	7.86%	16.94%	\$ 13,112,870	\$ 6,181,651	83.92%	89.82%	\$ 419.38	\$ 545.41
August	29,962	10,804	7.54%	16.45%	\$ 10,804,292	\$ 5,208,422	83.61%	90.42%	\$ 360.60	\$ 482.08
September	27,970	10,305	7.03%	15.71%	\$ 9,115,258	\$ 4,540,078	82.42%	89.63%	\$ 325.89	\$ 440.57
October	26,747	10,136	6.69%	15.44%	\$ 8,349,035	\$ 4,414,473	80.30%	88.39%	\$ 312.15	\$ 435.52
November	24,302	9,655	6.04%	14.55%	\$ 8,502,093	\$ 4,539,214	78.95%	87.56%	\$ 349.85	\$ 470.14
December	23,844	10,074	5.91%	15.07%	\$ 11,415,574	\$ 5,865,072	72.92%	82.64%	\$ 478.76	\$ 582.20
2020 January	26,097	11,454	6.46%	17.10%	\$ 16,880,286	\$ 8,274,167	63.28%	73.22%	\$ 646.83	\$ 722.38
February	26,152	13,790	6.47%	20.25%	\$ 19,879,442	\$ 9,773,935	66.37%	75.77%	\$ 760.15	\$ 708.77
March	17,206	8,523	4.25%	12.48%	\$ 15,084,881	\$ 8,213,918	99.83%	99.79%	\$ 876.72	\$ 963.74
April	17,594	8,727	4.35%	12.75%	\$ 15,780,073	\$ 8,653,668	99.98%	99.97%	\$ 896.90	\$ 991.60
May	17,574	8,747	4.34%	12.76%	\$ 15,606,633	\$ 8,666,884	99.99%	100.00%	\$ 888.05	\$ 990.84
June	17,475	8,717	4.31%	12.75%	\$ 15,112,491	\$ 8,546,375	99.93%	99.89%	\$ 864.81	\$ 980.43
July	17,031	8,525	4.20%	12.53%	\$ 14,124,057	\$ 8,102,418	100.00%	100.00%	\$ 829.31	\$ 950.43
August	25,392	5,401	6.26%	7.94%	\$ 16,937,627	\$ 9,148,578	77.96%	84.50%	\$ 667.05	\$ 1,693.87
September	31,798	12,513	7.83%	18.46%	\$ 18,857,242	\$ 9,807,967	64.00%	74.42%	\$ 593.03	\$ 783.82
October	28,636	11,536	7.04%	17.01%	\$ 17,590,476	\$ 9,303,715	63.96%	74.85%	\$ 614.28	\$ 806.49
November	27,791	11,194	6.82%	16.46%	\$ 17,765,104	\$ 9,379,271	60.30%	71.38%	\$ 639.24	\$ 837.88
December	28,540	11,333	6.99%	16.55%	\$ 20,752,804	\$ 10,509,198	56.56%	69.62%	\$ 727.15	\$ 927.31
2021 January	28,216	11,501	6.91%	16.81%	\$ 24,963,400	\$ 12,317,336	54.17%	67.44%	\$ 884.72	\$ 1,070.98
February	15,016	7,512	3.67%	10.81%	\$ 18,075,336	\$ 10,366,257	88.85%	94.12%	\$ 1,203.74	\$ 1,379.96

March	25,192	10,668	6.16%	15.33%	\$ 28,920,218	\$ 14,197,385	61.05%	73.12%	\$ 1,147.99	\$ 1,330.84
April	26,751	10,751	6.54%	15.46%	\$ 28,964,087	\$ 13,860,790	66.64%	77.40%	\$ 1,082.73	\$ 1,289.26
May	28,832	11,057	7.07%	16.10%	\$ 27,586,768	\$ 12,750,603	75.63%	83.70%	\$ 956.81	\$ 1,153.17
June	29,029	10,603	7.14%	15.62%	\$ 23,331,838	\$ 11,190,158	85.10%	90.70%	\$ 803.74	\$ 1,055.38
July	28,038	10,471	6.90%	15.56%	\$ 19,855,935	\$ 9,724,605	88.20%	92.57%	\$ 708.18	\$ 928.72
August	26,672	9,838	6.57%	14.66%	\$ 16,786,329	\$ 8,340,402	89.00%	93.16%	\$ 629.36	\$ 847.77
September	24,898	9,081	6.12%	13.60%	\$ 14,281,305	\$ 7,127,575	87.97%	92.11%	\$ 573.59	\$ 784.89
October	22,956	8,417	5.63%	12.58%	\$ 12,522,118	\$ 6,351,036	87.17%	91.70%	\$ 545.48	\$ 754.55
November	21,000	7,748	5.14%	11.41%	\$ 12,161,795	\$ 6,206,017	86.27%	90.66%	\$ 579.13	\$ 800.98
December	22,251	8,401	5.43%	12.27%	\$ 15,606,620	\$ 7,600,807	77.09%	84.99%	\$ 701.39	\$ 904.75
2022 January	22,443	9,106	5.46%	13.16%	\$ 21,103,695	\$ 9,890,635	70.80%	78.92%	\$ 940.32	\$ 1,086.17
February	23,394	10,398	5.70%	14.36%	\$ 26,144,282	\$ 12,584,941	70.92%	79.03%	\$ 1,117.56	\$ 1,210.32
March	25,136	10,465	6.12%	14.44%	\$ 30,317,113	\$ 13,753,034	70.98%	79.77%	\$ 1,206.12	\$ 1,314.19
April	25,659	10,179	6.26%	14.19%	\$ 28,480,875	\$ 13,235,916	76.18%	85.23%	\$ 1,109.98	\$ 1,300.32

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-014:

From January 2019 to the most recent date available, disaggregated by month and year, how many residential customers were terminated for nonpayment?

- a. How many of those customers were reconnected?
- b. What was the average reconnection time?

Response:

Please see the chart below for the number of residential customers terminated for non-payment since January 2019.

	2022	2021	2020	2019
Jan	1	0	0	2
Feb	5	0	0	6
Mar	14	0	0	8
Apr	2,318	0	0	1934
May	0	2525	0	1958
Jun	0	2374	0	1817
Jul	0	1298	0	1600
Aug	0	1182	0	1339
Sep	0	1095	0	1018
Oct	0	871	0	756
Nov	0	410	0	332
Dec	0	5	0	0

Question No. CAUSE-PA 1-014

Respondent: D. Davis

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The Company is unable to report how many of these customers were reconnected nor the average reconnection time.

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-015:

From January 2019 to the most recent date available, disaggregated by month, how many confirmed low income customers were terminated for nonpayment?

- a. How many of those customers were reconnected?
- b. What was the average reconnection time?

Response:

Please see the chart below for the number of low-income customers terminated for non-payment since January 2019.

	2022	2021	2020	2019
Jan	0	0	0	0
Feb	0	0	0	0
Mar	0	0	0	0
Apr	1,203	0	0	990
May	0	1319	0	1057
Jun	0	1258	0	988
Jul	0	744	0	934
Aug	0	673	0	806
Sep	0	665	0	614
Oct	0	529	0	480
Nov	0	287	0	196
Dec	0	0	0	0

Question No. CAUSE-PA 1-015

Respondent: D. Davis

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The Company is unable to report how many of these customers reconnected nor the average reconnection time.

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
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Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1

Question No. CAUSE-PA 1-016:

From January 2019 to the most recent date available, disaggregated by month, how many CAP customers were terminated for nonpayment?

- a. How many of those customers were reconnected?
- b. What was the average reconnection time?

Response:

Please see the chart below for the number of CAP customers terminated for non-payment since January 2019.

	2022	2021	2020	2019
January	0		0	0
February	0		0	0
March	0		0	0
April			0	102
May		182	0	145
June		228	0	168
July		126	0	224
August		131	0	160
September		111	0	115
October		102	0	88
November		39	0	35
December		0	0	0

Question No. CAUSE-PA 1-016
Respondent: D. Davis
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The Company is unable to provide the number of these customers reconnected nor the average reconnection time.

Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

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**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 1**

Question No. CAUSE-PA 1-022:

Regarding the emergency measures put in place by Columbia in response to the COVID-19 pandemic, please list which measures are still in place and provide the starting and ending date for all COVID-19 measures.

Response:

Please see the chart below for the requested data.

Program	COVID Emergency Measure	Start Date	End Date
All Residential	Offered additional payment plans	May-20	10/1/2021
All Residential	Ceased charging late fees	Jun-20	1/13/2022
All Residential	Ceased Terminations for non payment	did not occur in 2020	5/3/2021
CAP	Ceased removing customers for failing to reverify income	Mar-20	4/30/2022
CAP	Did not require verification of income beyond verbal for entry	Jun-20	6/1/2021
CAP	Accepted income that was previously not accepted, for example pay stubs with YTD rather than full 30 days, etc.	6/1/2021	On going
CAP	Did not remove customers for failing to comply with weatherization (all customers are individually considered for waiver if they contact the Company)	Mar-20	6/1/2021
Hardship Fund	Open to all income eligible customers regardless of status	Apr-20	10/1/2022
Hardship Fund	removed eligibility requirement of a sincere effort of payment	Apr-20	9/1/2022
Hardship Fund	Raised income guidelines to 300%	Dec-20	10/1/2022
LIURP	Stopped LIURP in homes	Mar-20	9/1/2020
LIURP	Paid for acceptable costs to LIURP contractors for COVID precautions	Sep-20	on an as needed basis now

Question No. CAUSE-PA 2-001
Respondent: K. Johnson
Page 1 of 1

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 2

Question No. CAUSE-PA 2-001:

For each year since 2010, as of the last day of the year, please provide the dollar amount of the average residential customer monthly bill at the following usage levels:

- a. 70 therms
- b. 170 therms
- c. 250 therms

Response:

Please see CAUSE-PA 2-001 Attachment A showing the dollar amount of the average residential customer monthly bill at 70, 170, and 250 therms as of December 31, 2010-2021.

Columbia Gas of Pennsylvania, Inc.

Dollar Amount of the Average Residential Customer Monthly Bill & Distribution Charge Portion of Bill

As of December 31, 2010-2021

Components of CAUSE-PA 2 - 001 & 002 Calculation												
	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011 *	2010 *
Customer Charge	16.75	16.75	16.75	16.75	16.75	16.75	16.75	16.75	16.75	18.73	18.73	12.25
Commodity Charge:												
All Gas Consumed	0.72962	0.60763	0.60763	0.55316	0.55316	0.47806	0.42138	0.35017	0.35017	-	-	0.25857
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	-	-	-	-	-
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	-	-	0.26708	0.27556	-
Rider USP - Universal Service Plan	0.12135	0.07639	0.07357	0.09789	0.09034	0.06959	0.06621	0.07853	0.05605	0.04125	0.04835	0.09486
Rider CC - Customer Choice	0.00010	0.00010	0.00010	0.00010	0.00010	0.00010	0.00009	0.00009	-	-	-	-
Gas Procurement Charge	0.00113	0.00695	0.00695	0.00695	0.00695	0.00695	0.00695	0.00695	0.00535	-	-	-
Storage Interest	-	-	-	-	-	-	-	-	-	-	-	(0.00192)
Gas Cost	0.57280	0.34004	0.36267	0.38836	0.43292	0.39196	0.34626	0.52459	0.51300	0.51084	0.53115	0.75154
Merchant Function Charge	0.00476	0.00312	0.00340	0.00399	0.00471	0.00439	0.00481	0.00640	0.00708	0.00600	0.00777	0.00945
State Tax Adjustment	-	-	-	-	-	-	-	-	-	-0.116%	-	-

Dollar Amount of the Average Residential Customer Monthly Bill - CAUSE-PA 2-001												
Therms	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010
70	\$ 116.83	\$ 89.15	\$ 90.55	\$ 90.28	\$ 92.92	\$ 83.32	\$ 75.95	\$ 84.42	\$ 81.97	\$ 57.76	\$ 59.84	\$ 90.12
170	\$ 259.81	\$ 192.57	\$ 195.98	\$ 195.33	\$ 201.74	\$ 178.43	\$ 160.52	\$ 181.09	\$ 175.13	\$ 113.54	\$ 118.56	\$ 201.37
250	\$ 374.19	\$ 275.31	\$ 280.33	\$ 279.36	\$ 288.80	\$ 254.51	\$ 228.18	\$ 258.43	\$ 249.66	\$ 158.16	\$ 165.54	\$ 290.37

Dollar Amount of the Average Residential Customer Distribution Charge Portion of Bill - CAUSE-PA 2-002												
Therms	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010
70	\$ 67.82	\$ 59.28	\$ 59.28	\$ 55.47	\$ 55.47	\$ 50.21	\$ 46.25	\$ 41.26	\$ 41.26	\$ 31.82	\$ 32.23	\$ 30.35
170	\$ 140.79	\$ 120.05	\$ 120.05	\$ 110.79	\$ 110.79	\$ 98.02	\$ 88.38	\$ 76.28	\$ 76.28	\$ 58.52	\$ 59.79	\$ 56.21
250	\$ 199.16	\$ 168.66	\$ 168.66	\$ 155.04	\$ 155.04	\$ 136.27	\$ 122.10	\$ 104.29	\$ 104.29	\$ 79.89	\$ 81.83	\$ 76.89

* Volumetric rates for 2010 and 2011 were converted from Mcf to Therms for presentation purposes of this data request.

Question No. CAUSE-PA 2-002
Respondent: K. Johnson
Page 1 of 1

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 2

Question No. CAUSE-PA 2-002:

For each response to CAUSE-PA II-1, please provide the dollar amount of the distribution charge portion the bill.

Response:

Please see CAUSE-PA 2-002 Attachment A showing the dollar amount of the average residential customer distribution charge portion of a monthly bill at 70, 170, and 250 therms as of December 31, 2010-2021.

Columbia Gas of Pennsylvania, Inc.

Dollar Amount of the Average Residential Customer Monthly Bill & Distribution Charge Portion of Bill

As of December 31, 2010-2021

Components of CAUSE-PA 2 - 001 & 002 Calculation												
	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011 *	2010 *
Customer Charge	16.75	16.75	16.75	16.75	16.75	16.75	16.75	16.75	16.75	18.73	18.73	12.25
Commodity Charge:												
All Gas Consumed	0.72962	0.60763	0.60763	0.55316	0.55316	0.47806	0.42138	0.35017	0.35017	-	-	0.25857
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	-	-	-	-	-
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	-	-	0.26708	0.27556	-
Rider USP - Universal Service Plan	0.12135	0.07639	0.07357	0.09789	0.09034	0.06959	0.06621	0.07853	0.05605	0.04125	0.04835	0.09486
Rider CC - Customer Choice	0.00010	0.00010	0.00010	0.00010	0.00010	0.00010	0.00009	0.00009	-	-	-	-
Gas Procurement Charge	0.00113	0.00695	0.00695	0.00695	0.00695	0.00695	0.00695	0.00695	0.00535	-	-	-
Storage Interest	-	-	-	-	-	-	-	-	-	-	-	(0.00192)
Gas Cost	0.57280	0.34004	0.36267	0.38836	0.43292	0.39196	0.34626	0.52459	0.51300	0.51084	0.53115	0.75154
Merchant Function Charge	0.00476	0.00312	0.00340	0.00399	0.00471	0.00439	0.00481	0.00640	0.00708	0.00600	0.00777	0.00945
State Tax Adjustment	-	-	-	-	-	-	-	-	-	-0.116%	-	-

Dollar Amount of the Average Residential Customer Monthly Bill - CAUSE-PA 2-001												
Therms	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010
70	\$ 116.83	\$ 89.15	\$ 90.55	\$ 90.28	\$ 92.92	\$ 83.32	\$ 75.95	\$ 84.42	\$ 81.97	\$ 57.76	\$ 59.84	\$ 90.12
170	\$ 259.81	\$ 192.57	\$ 195.98	\$ 195.33	\$ 201.74	\$ 178.43	\$ 160.52	\$ 181.09	\$ 175.13	\$ 113.54	\$ 118.56	\$ 201.37
250	\$ 374.19	\$ 275.31	\$ 280.33	\$ 279.36	\$ 288.80	\$ 254.51	\$ 228.18	\$ 258.43	\$ 249.66	\$ 158.16	\$ 165.54	\$ 290.37

Dollar Amount of the Average Residential Customer Distribution Charge Portion of Bill - CAUSE-PA 2-002												
Therms	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010
70	\$ 67.82	\$ 59.28	\$ 59.28	\$ 55.47	\$ 55.47	\$ 50.21	\$ 46.25	\$ 41.26	\$ 41.26	\$ 31.82	\$ 32.23	\$ 30.35
170	\$ 140.79	\$ 120.05	\$ 120.05	\$ 110.79	\$ 110.79	\$ 98.02	\$ 88.38	\$ 76.28	\$ 76.28	\$ 58.52	\$ 59.79	\$ 56.21
250	\$ 199.16	\$ 168.66	\$ 168.66	\$ 155.04	\$ 155.04	\$ 136.27	\$ 122.10	\$ 104.29	\$ 104.29	\$ 79.89	\$ 81.83	\$ 76.89

* Volumetric rates for 2010 and 2011 were converted from Mcf to Therms for presentation purposes of this data request.

Question No. CAUSE-PA 2-003

Respondent: K. Johnson

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Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 2

Question No. CAUSE-PA 2-003:

For each Columbia base rate filing since 2010, please provide:

- a. The average residential customer bill at the time of filing,
- b. The average residential customer bill after the approved rate increase,
- c. The distribution charge portion of the average residential customer bill at the time of filing,
- d. The distribution charge portion of the average residential customer bill after the approved rate increase,

Response:

- a. Please see Page 1 of CAUSE-PA 2-003 Attachment A showing the average residential customer bill at the time of base rate case filing from 2010 – Current.
- b. Please see Page 2 of CAUSE-PA 2-003 Attachment A showing the average residential customer bill after the approved base rate case from 2010 – Current.
- c. Please see Page 1 of CAUSE-PA 2-003 Attachment A showing the average residential customer distribution charge portion of bill at the time of base rate case filing from 2010 – Current.
- d. Please see Page 2 of CAUSE-PA 2-003 Attachment A showing the average residential customer distribution charge portion of bill after the approved base rate case from 2010 – Current.

Please note, Columbia did not file base rate cases in 2013, 2017, and 2019.

Question No. CAUSE-PA 2-003

Respondent: K. Johnson

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Columbia Gas of Pennsylvania, Inc.
Average Residential Customer Monthly Bill & Distribution Charge Portion of Bill at Time of Filing and After Approved Rate Case
Rate Cases 2010 - Current

Rate Case - Average Residential Bill and Distribution Charge Portion of Bill At Time of Filing - Present Rates from Exhibit 111, Sch 6, Page 1										
	2022	2021	2020	2018	2016	2015	2014	2012	2011 *	2010 *
Customer Charge	16.75	16.75	16.75	16.75	16.75	16.75	16.75	18.73	12.25	11.50
Commodity Charge:										
All Gas Consumed	0.83527	0.72962	0.60763	0.55316	0.47806	0.42138	0.35017	-	0.25857	0.24281
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	-	-	-
Distribution Charge - First 21 Therms	-	-	-	-	-	-	-	0.26708	-	-
Rider USP - Universal Service Plan	0.13052	0.08173	0.06824	0.09183	0.06621	0.08800	0.06118	0.03595	0.09486	0.05993
Rider CC - Customer Choice	0.00010	0.00010	0.00010	0.00010	0.00010	0.00009	-	-	-	-
Gas Procurement Charge	0.00113	0.00102	0.00695	0.00695	0.00695	0.00676	0.00535	-	-	-
Storage Interest									(0.00192)	(0.00243)
Gas Cost	0.54943	0.38512	0.34808	0.41351	0.30994	0.53891	0.55316	0.43212	0.75154	0.67197
Merchant Function Charge	0.00474	0.00269	0.00304	0.00414	0.00416	0.00676	0.00708	0.00590	0.00866	0.00970
State Tax Adjustment	-	-	-	-	-	-	0.062%	-0.116%	0.000%	-0.106%
Volumes (Dth) - (Per Exh 103, Sch 08)	35,096,959.7	34,643,463.1	34,645,192.4	34,437,601.0	34,403,669.0	33,927,676.1	33,407,609.8	32,785,787.8	31,343,013.2	32,983,630.4
Bills - (Per Exh 103, Sch 08)	4,966,131	4,938,141	4,875,904	4,828,182	4,734,841	4,704,314	4,679,515	4,603,511	4,547,948	4,555,462
Average Residential Bill Usage - Therms	70.67	70.15	71.05	71.33	72.66	72.12	71.39	71.22	68.92	72.40

Average Residential Customer Bill at Time of Filing										
	2022	2021	2020	2018	2016	2015	2014	2012	2011	2010
CAUSE-PA 2-003 - a.	\$ 124.25	\$ 101.57	\$ 89.83	\$ 92.34	\$ 77.91	\$ 91.79	\$ 85.79	\$ 65.86	\$ 88.87	\$ 82.57

Average Residential Customer Distribution Charge Portion of Bill at Time of Filing										
	2022	2021	2020	2018	2016	2015	2014	2012	2011	2010
CAUSE-PA 2-003 - c.	\$ 75.78	\$ 68.31	\$ 59.69	\$ 55.84	\$ 50.53	\$ 46.53	\$ 41.50	\$ 32.14	\$ 30.52	\$ 28.66

* Volumetric rates for 2010 and 2011 were converted from Mcf to Therms for presentation purposes of this data request.

Columbia Gas of Pennsylvania, Inc.
Average Residential Customer Monthly Bill & Distribution Charge Portion of Bill at Time of Filing and After Approved Rate Case
Rate Cases 2010 - Current

Rate Case - Average Residential Bill and Distribution Charge Portion of Bill After Approved Rate Case										
	2022	2021	2020	2018	2016	2015	2014	2012	2011 *	2010 *
Customer Charge		16.75	16.75	16.75	16.75	16.75	16.75	16.75	18.73	12.25
Commodity Charge:										
All Gas Consumed		0.83527	0.72962	0.60763	0.55316	0.47806	0.42138	0.35017	-	0.25857
Distribution Charge - First 21 Therms		-	-	-	-	-	-	-	-	-
Distribution Charge - First 21 Therms		-	-	-	-	-	-	-	0.26708	-
Rider USP - Universal Service Plan		0.13052	0.08173	0.06824	0.09183	0.06621	0.08800	0.06118	0.03595	0.09486
Rider CC - Customer Choice		0.00010	0.00010	0.00010	0.00010	0.00010	0.00009	-	-	-
Gas Procurement Charge		0.00113	0.00102	0.00695	0.00695	0.00695	0.00676	0.00535	-	-
Storage Interest										(0.00192)
Gas Cost		0.54943	0.38512	0.34808	0.41351	0.30994	0.53891	0.55316	0.43212	0.75154
Merchant Function Charge		0.00474	0.00269	0.00304	0.00414	0.00416	0.00676	0.00708	0.00590	0.00866
State Tax Adjustment		-	-	-	-	-	-	0.062%	-0.116%	0.000%
Volumes (Dth) - (Per Exh 103, Sch 08)		35,096,959.7	34,643,463.1	34,645,192.4	34,437,601.0	34,403,669.0	33,927,676.1	33,407,609.8	32,785,787.8	31,343,013.2
Bills - (Per Exh 103, Sch 08)		4,966,131	4,938,141	4,875,904	4,828,182	4,734,841	4,704,314	4,679,515	4,603,511	4,547,948
Average Residential Bill Usage - Therms		70.67	70.15	71.05	71.33	72.66	72.12	71.39	71.22	68.92

Rate Case - Average Residential Bill After Approved Rate Case										
	2022	2021	2020	2018	2016	2015	2014	2012	2011	2010
CAUSE-PA 2-003 - b.	TBD	\$ 124.25	\$ 101.57	\$ 89.83	\$ 92.34	\$ 77.91	\$ 91.79	\$ 85.79	\$ 65.86	\$ 88.87

Rate Case - Average Residential Customer Distribution Charge Portion of Bill After Approved Rate Case										
	2022	2021	2020	2018	2016	2015	2014	2012	2011	2010
CAUSE-PA 2-003 - d.	TBD	\$ 75.78	\$ 68.31	\$ 59.69	\$ 55.84	\$ 50.53	\$ 46.53	\$ 41.50	\$ 32.14	\$ 30.52

* Volumetric rates for 2010 and 2011 were converted from Mcf to Therms for presentation purposes of this data request.

Question No. CAUSE-PA 2-007
Respondent: D. Davis
T. Love
Page 1 of 1

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 2

Question No. CAUSE-PA 2-007:

Please describe all measures provided through Columbia's Energy Efficiency and Conservation (EE&C) program that are not currently provided to low income customers through Columbia's Low Income Usage Reduction Program (LIURP).

Response:

There are two measures that the LIURP program currently does not offer that are covered by the proposed Residential Prescriptive program. These measures are tankless water heaters and WiFi-enabled Thermostats.

Question No. CAUSE-PA 2-009

Respondent: D. Davis

T. Love

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES**

Set 2

Question No. CAUSE-PA 2-009:

Please explain all steps that Columbia will take to facilitate coordination between its proposed EE&C program and its LIURP and provide any documentation or materials that will be used to facilitate coordination between the programs.

Response:

The Company plans to integrate programming between its LIURP, Audit and Rebates program, and the proposed EE&C programs as much as possible. This is anticipated to take the form of customer referrals and comarketing of program activity.

Question No. OCA 3-006
Respondent: D. Davis
Page 1 of 1

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

OFFICE OF CONSUMER ADVOCATE INTERROGATORIES
Set 3

Question No. OCA 3-006:

Please provide, in Excel format if available, for the years 2018 to present, all data reported to the Pennsylvania PUC's Bureau of Consumer Services regarding:

- a. Collections performance;
- b. Chapter 14 performance;
- c. Universal service programs;
- d. LIURP

Response:

Please see Attachment A to this request for a copy of the data reported regarding collection performance.

Please see Attachment B to this request for a copy of the data reported regarding Chapter 14 performance.

Please see Attachment C to this request for copies of the Universal Service Reporting Requirements for years 2017 – 2021 and the CAP quarterly enrollment report for years 2018 – 2022 year to date.

Please see Attachment D to this request for copies of the Annual LIURP reports filed in 2018 through 2022 and copies of the annual LIURP spend report filed in years 2018 - 2022.

Universal Services Reporting Requirements - 2017

Collections		All Residential	Conf. Low Income
1. Total Number(#) - Payment Arrangements		24,597	15,339
2. Total Number (#) - Successful Payment Arrangements		8,292	4,570
3. Annual Collection Operating Expenses (\$)		\$5,072,461	\$2,493,510
4. Total Dollar Amount (\$) - Gross Residential Write-Offs		\$7,722,801	\$5,417,332
5. Total Dollar Amount (\$) - Net Residential Write Offs		\$4,653,338	\$3,404,382
6. Total Number (#) Residential Customers - By Month			
January		394,889	68,943
February		395,083	70,274
March		395,090	70,145
April		393,908	69,496
May		392,428	68,811
June		391,477	67,901
July		390,813	66,855
August		390,624	66,174
September		391,101	66,022
October		392,834	66,344
November		395,546	66,883
December		397,121	67,659
7. A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month			
January		12,360	7,022
February		15,495	8,466
March		18,099	9,492
April		19,421	9,673
May		19,631	9,403
June		18,965	8,754
July		17,604	7,922
August		15,753	7,222
September		13,557	6,412
October		11,753	5,783
November		10,698	5,527
December		10,614	5,636
7. B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month			
January		13,258	5,280
February		10,892	4,532
March		9,105	3,222
April		6,968	2,100
May		10,212	2,640
June		12,091	3,210
July		11,920	3,167
August		12,480	3,273
September		12,462	3,308
October		12,312	3,360
November		11,554	3,254
December		12,229	4,048
8. A. Total Dollar Amount (\$) Residential Accounts in Arrears on Agreements - By Month			
January		\$8,297,659	\$5,078,242
February		\$11,346,221	\$6,695,315
March		\$13,415,750	\$7,791,610
April		\$13,535,931	\$7,411,692
May		\$12,214,542	\$6,541,734
June		\$10,153,470	\$5,353,567
July		\$8,001,901	\$4,254,476
August		\$6,264,353	\$3,453,164
September		\$4,923,073	\$2,783,211
October		\$4,207,383	\$2,473,007
November		\$4,380,901	\$2,626,314
December		\$5,936,146	\$3,478,292

Universal Services Reporting Requirements - 2017

Collections		All Residential	Conf. Low Income
8. B. Total Dollar Amount (\$) Residential Accounts in Arrears not on Agreements - By Month			
January		\$5,820,035	\$2,358,767
February		\$6,845,428	\$2,679,881
March		\$6,317,651	\$2,246,167
April		\$4,581,853	\$1,395,995
May		\$3,981,222	\$1,138,200
June		\$2,845,788	\$880,769
July		\$1,999,426	\$648,696
August		\$1,770,634	\$550,647
September		\$1,674,222	\$550,398
October		\$1,700,109	\$578,164
November		\$1,818,876	\$646,622
December		\$3,478,398	\$1,334,163
9. Total Number (#) Residential Payment Troubled Customers - By Month			
January		9019	5670
February		9409	5946
March		10682	6714
April		11881	7359
May		13232	8097
June		14367	8740
July		14787	9007
August		14947	9114
September		14402	8896
October		14086	8857
November		14009	8993
December		14796	9562
10. Total Number (#) Terminations - By Month			
January		2	0
February		0	0
March		6	0
April		1825	1123
May		1808	993
June		1672	958
July		1538	922
August		1550	941
September		1096	670
October		799	522
November		426	296
December		1	0
11. Total Number (#) Reconnections - By Month			
January		50	22
February		27	10
March		25	9
April		453	255
May		656	346
June		605	313
July		526	271
August		785	424
September		796	456
October		905	469
November		855	463
December		198	85
12. Total Number (#) Low Income Households (Accounts) (Estimated)		101,375	
<i>Submit Estimation Methodology in a Separate Document</i>			
12. B. Annual Residential Revenues (\$)		\$392,397,339	\$69,240,784

Universal Services Reporting Requirements - 2017

LIURP	Value
13. Program Costs (\$)/Actual Spending for the Year Just Completed	\$4,492,304
14. Number of Family Members Under Age 18	0.76
15. Number of Family Members Over Age 62	0.26
16. Family Size	2.86
17. Income (\$)	\$17,738
18. Source of Income	
Employment	188
Public Assistance	5
Pension/Retirement	133
Unemployment Compensation	11
Disability	15
Other (Includes Missing Data)	88
19. Participation Levels By Month (#) - Reporting Year	
Heating Jobs	
January	48
February	26
March	39
April	42
May	33
June	46
July	34
August	45
September	28
October	30
November	38
December	31
Water Heating Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Baseload Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
20. Projected Spending for Current Year - (\$)	\$5,007,696
21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	490
Water Heating Jobs	0
Baseload Jobs	0

Universal Services Reporting Requirements - 2017

LIURP		Value
22. Average Job Costs (\$)		
Heating Jobs		\$6,709
Water Heating Jobs		0
Baseload Jobs		0
22 A. Source of Intake		
Distribution Company		440
Community Based Organization		0
Other		0
22 B. Participants in Multiple Programs		
LIURP and CAP		323
LIURP and CARES		3
LIURP and Hardship Fund		20
LIURP, CAP and CARES		1
LIURP, CAP and Hardship Fund		8
LIURP, CARES and Hardship Fund		1
LIURP, CAP, CARES and Hardship Fund		0

Universal Services Reporting Requirements - 2017

CAP	Value
23. Program Costs - Administration (\$)	\$1,189,172
24. Program Costs - CAP Credits (\$)	\$17,005,264
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$1,474,268
Program Costs - CAP Accounts in Arrears (\$)	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	\$0.00
26.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (\$)	\$0.00
Program Costs - CAP Accounts in Arrears (#)	
27.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.11%
29. Number of Family Members Over Age 62	1.55%
30. Family Size	2.66%
31. Income (\$)	\$15,116
32. Source of Income	
Employment	10,303
Public Assistance	663
Pension/Retirement	9,690
Unemployment Compensation	638
Disability	2,409
Other (Includes Missing Data)	4,687
Participation Levels By Month	
33. Income at or below 50% of Poverty (#)	
January	4,638
February	4,775
March	4,983
April	5,025
May	5,251
June	5,327
July	5,332
August	5,255
September	5,189
October	5,090
November	5,062
December	4,887
34. Income between 51% and 100% of Poverty (#)	
January	9,928
February	10,125
March	10,483
April	10,570
May	10,811
June	10,793
July	10,653
August	10,515
September	10,422
October	10,294
November	10,287
December	10,026
35. Income between 101% and 150% of Poverty (#)	
January	6,956
February	7,085
March	7,302
April	7,507
May	7,673
June	7,612
July	7,654
August	7,581
September	7,462
October	7,586
November	7,572
December	7,342

Universal Services Reporting Requirements - 2017

CAP	Value
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	743
37. Participation Levels: Default Exits - Income between 51% and 100% of Poverty (#)	1,235
38. Participation Levels: Default Exits - Income between 101% and 150% of Poverty (#)	1,058
39. Participation Levels: Exits other than Defaults (#)	2,937
40. Energy Assistance Benefits (\$)	\$2,937,090
41. Energy Assistance Benefits (#)	10,534
42. Number of Full CAP Payments by Month	
January	8,279
February	8,707
March	10,041
April	9,256
May	11,557
June	12,374
July	13,028
August	15,255
September	14,724
October	15,291
November	12,785
December	9,034
43. Total Annual CAP Billed Amount - (used to calculate Average CAP Bills) (\$)	\$12,598,585
44. Total Number of CAP Bills Rendered by Month (#)	
January	20,785
February	19,469
March	23,887
April	19,618
May	24,281
June	23,390
July	22,226
August	23,970
September	21,809
October	23,039
November	21,586
December	19,999
45. Total Cash Payments by CAP Customers (\$)	\$9,050,991
46. Number of Full, On-Time Payments (#)	122,419
46. A. Source of Intake	
Distribution Company	7,855
Community-Based Organization	9,480
Other	0
46.B. Participants in Multiple Programs	
CAP and LIURP	323
CAP and CARES	29
CAP and Hardship Funds	471
CAP, LIURP, CARES	1
CAP, LIURP, Hardship Fund	8
CAP, CARES and Hardship Fund	5
CAP, LIURP, CARES and Hardship Fund	0

Universal Services Reporting Requirements - 2017

CARES	Value
47. Program Costs (\$)	\$397,491
48. Number of Family Members Under Age 18	0.13
49. Number of Family Members Over Age 62	0.38
50. Family Size	1.78
51. Income (\$)	\$23,840
52. Source of Income	
Employment	28
Public Assistance	0
Pension/Retirement	73
Unemployment Compensation	0
Disability	1
Other (Includes Missing Data)	7
53. Participation Levels By Month	
January	122
February	138
March	137
April	133
May	115
June	103
July	108
August	125
September	111
October	135
November	115
December	92
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)	\$4,139
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)	16
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)	\$2,735
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)	7
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (CARES)	\$6,136,400
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)	19,100
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	\$1,084,211
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	4,013
62. Direct Dollars Applied to CARES Account (\$)	\$86,071
63. Direct Dollars Applied to Cases Account (#)	105
64. CARES Benefits (#) - Number of Customers Referred to CARES	813
65. CARES Benefits (#) - Number of Customers Accepted into CARES	42
65.A. Source of Intake	
Distribution Company	110
Community-Based Organization	0
Other	0
65.B. Participants in Multiple Programs	
CARES and LIURP	3
CARES and CAP	29
CARES and Hardship Fund	46
CARES, LIURP and CAP	1
CARES, LIURP and Hardship Fund	1
CARES, CAP and Hardship Fund	5
CARES, LIURP, CAP and Hardship Fund	0

Universal Services Reporting Requirements - 2017

HARDSHIP		Value
66. Program Costs (Administrative Costs Only)		
Administrative Costs from Rate Base (\$)		\$69,584
Administrative Costs from Shareholders (\$)		\$0.00
67. Number of Family Memembers Under Age 18		1.11
68. Number of Family Members Over Age 62		0.27
69. Family Size		2.70
70. Income (\$)		\$24,154
71. Source of Income		
Employment		827
Public Assistance		8
Pension/Retirement		270
Unemployment Compensation		44
Disability		189
Other (Including Missing Data)		99
72. Participant Levels By Month (#)		
November		194
December		13
January		6
February		31
March		244
April		221
May		209
June		169
July		133
August		121
September		97
October		0
73. Ratepayer/Employee Contributions (\$)		\$375,000
74. Special Contributions (\$)		
Citizens Energy Corporation		\$0
Companies Other Than Utilities		0
Settlements and Fines		\$0
Other		0
75. Utility Contributions (\$) - Initial grant (excluding admin. \$ and grants dependent on ratepayer match)		0
76. Utility Contributions (\$) - (excluding #66 and #75)		\$150,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$150,000
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) - This is a separate list.		
Hardship Fund Benefits		
79. Cash Benefits (#)		1,438
80. Cash Benefits (\$)		\$569,828
80.A. Source of Intake		
Distribution Company		0
Community-Based Organization		1,438
Other		0
80.B. Participants in Multiple Programs		
Hardship Fund and LIURP		20
Hardship Fund and CAP		471
Hardship Fund and CARES		46
Hardship Fund, LIURP and CAP		8
Hardship Fund, LIURP and CARES		1
Hardship Fund, CARES and CAP		5
Hardship Fund, LIURP, CAP and CARES		0

Universal Services Reporting Requirements - 2018

Collections	All Residential	Conf. Low Income
1. Total Number(#) - Payment Arrangements	27,781	15,735
2. Total Number (#) - Successful Payment Arrangements	9,066	4,398
3. Annual Collection Operating Expenses (\$)	\$4,848,900	\$2,348,014
4. Total Dollar Amount (\$) - Gross Residential Write-Offs	\$8,531,390	\$4,937,124
5. Total Dollar Amount (\$) - Net Residential Write Offs	\$5,198,411	\$2,998,718
6. Total Number (#) Residential Customers - By Month		
January	397,861	69,279
February	398,006	69,655
March	398,188	69,778
April	397,161	69,004
May	395,845	68,015
June	395,036	67,144
July	394,328	66,429
August	394,320	65,819
September	394,959	65,747
October	397,153	66,249
November	399,088	66,613
December	400,080	67,350
7. A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month		
January	12,183	6,446
February	15,295	7,686
March	18,429	8,714
April	19,868	9,026
May	20,287	8,859
June	19,815	8,376
July	18,700	7,878
August	17,063	7,341
September	15,268	6,790
October	13,646	6,357
November	12,379	5,941
December	12,298	6,063
7. B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month		
January	13,251	5,201
February	10,884	4,485
March	8,257	3,044
April	6,420	1,928
May	9,785	2,675
June	11,964	3,065
July	12,388	3,192
August	12,607	3,032
September	12,271	3,073
October	12,366	3,117
November	11,246	3,086
December	11,249	3,615
8. A. Total Dollar Amount (\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$8,902,837	\$5,053,440
February	\$11,944,296	\$6,577,147
March	\$14,721,230	\$7,600,390
April	\$15,168,554	\$7,488,377
May	\$14,053,656	\$6,857,788
June	\$11,712,171	\$5,646,188
July	\$9,485,792	\$4,677,174
August	\$7,568,770	\$3,882,303
September	\$6,396,529	\$3,418,743
October	\$5,619,233	\$3,116,946
November	\$5,802,969	\$3,199,260
December	\$7,557,431	\$4,115,605

Universal Services Reporting Requirements - 2018

Collections	All Residential	Conf. Low Income
8. B. Total Dollar Amount (\$) Residential Accounts in Arrears not on Agreements - By Month		
January	\$6,534,728	\$2,605,996
February	\$8,161,521	\$2,985,555
March	\$6,707,373	\$2,396,279
April	\$4,568,681	\$1,374,649
May	\$4,918,522	\$1,405,002
June	\$3,433,214	\$1,046,195
July	\$2,258,118	\$717,597
August	\$1,877,605	\$569,888
September	\$1,649,612	\$502,016
October	\$1,744,443	\$564,826
November	\$1,982,661	\$669,384
December	\$3,500,247	\$1,244,948
9. Total Number (#) Residential Payment Troubled Customers - By Month		
January	8,896	5,176
February	9,306	5,483
March	10,526	6,137
April	11,717	6,757
May	13,353	7,634
June	14,407	8,108
July	14,634	8,323
August	14,827	8,480
September	15,326	8,915
October	15,393	9,067
November	16,043	9,496
December	17,270	10,220
10. Total Number (#) Terminations - By Month		
January	2	0
February	0	0
March	2	0
April	1,990	1,177
May	2,398	1,231
June	1,904	1,077
July	1,695	998
August	1,406	866
September	396	247
October	755	524
November	309	194
December	2	0
11. Total Number (#) Reconnections - By Month		
January	80	31
February	16	6
March	15	5
April	576	325
May	885	387
June	786	408
July	659	370
August	790	455
September	490	263
October	902	448
November	733	380
December	122	55
12. Total Number (#) Low Income Households (Accounts) (Estimated)	99,925	
<i>Submit Estimation Methodology in a Separate Document</i>		
12. B. Annual Residential Revenues (\$)	\$441,253,741	\$77,926,868

Universal Services Reporting Requirements - 2018

LIURP	Value
13. Program Costs (\$)/Actual Spending for the Year Just Completed	\$4,448,061
14. Number of Family Members Under Age 18	1.05%
15. Number of Family Members Over Age 62	0.49%
16. Family Size	2.74%
17. Income (\$)	\$18,439
18. Source of Income	
Employment	178
Public Assistance	4
Pension/Retirement	143
Unemployment Compensation	8
Disability	52
Other (Includes Missing Data)	48
19. Participation Levels By Month (#) - Reporting Year	
Heating Jobs	
January	32
February	21
March	23
April	31
May	28
June	25
July	39
August	43
September	39
October	54
November	48
December	50
Water Heating Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Baseload Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
20. Projected Spending for Current Year - (\$)	\$5,309,635
21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	417
Water Heating Jobs	0
Baseload Jobs	0

Universal Services Reporting Requirements - 2018

LIURP		Value
22. Average Job Costs (\$)		
Heating Jobs		\$8,172
Water Heating Jobs		0
Baseload Jobs		0
22 A. Source of Intake		
Distribution Company		498
Community Based Organization		0
Other		0
22 B. Participants in Multiple Programs		
LIURP and CAP		341
LIURP and CARES		3
LIURP and Hardship Fund		15
LIURP, CAP and CARES		1
LIURP, CAP and Hardship Fund		6
LIURP, CARES and Hardship Fund		3
LIURP, CAP, CARES and Hardship Fund		1

Universal Services Reporting Requirements - 2018

CAP	Value
23. Program Costs - Administration (\$)	\$639,525
24. Program Costs - CAP Credits (\$)	\$17,202,320
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$4,554,240
Program Costs - CAP Accounts in Arrears (\$)	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	\$0.00
26.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (\$)	\$0.00
Program Costs - CAP Accounts in Arrears (#)	
27.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.10%
29. Number of Family Members Over Age 62	1.54%
30. Family Size	2.64%
31. Income (\$)	\$16,313
32. Source of Income	
Employment	10,783
Public Assistance	596
Pension/Retirement	10,084
Unemployment Compensation	635
Disability	2,755
Other (Includes Missing Data)	4,835
Participation Levels By Month	
33. Income at or below 50% of Poverty (#)	
January	5,261
February	5,413
March	5,514
April	5,584
May	5,633
June	5,660
July	5,512
August	5,429
September	5,354
October	5,315
November	5,227
December	5,205
34. Income between 51% and 100% of Poverty (#)	
January	10,677
February	10,900
March	11,011
April	11,067
May	11,167
June	11,116
July	10,830
August	10,630
September	10,512
October	10,441
November	10,467
December	10,445
35. Income between 101% and 150% of Poverty (#)	
January	7,561
February	7,788
March	7,975
April	8,292
May	8,288
June	8,253
July	8,230
August	8,022
September	7,962
October	7,905
November	7,916
December	7,950

Universal Services Reporting Requirements - 2018

CAP	Value
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	886
37. Participation Levels: Default Exits - Income between 51% and 100% of Poverty (#)	1,405
38. Participation Levels: Default Exits - Income between 101% and 150% of Poverty (#)	1,251
39. Participation Levels: Exits other than Defaults (#)	3,163
40. Energy Assistance Benefits (\$)	\$2,863,358
41. Energy Assistance Benefits (#)	10,903
42. Number of Full CAP Payments by Month	
January	9,514
February	10,224
March	11,196
April	13,014
May	14,191
June	14,518
July	15,513
August	16,911
September	11,594
October	12,830
November	12,120
December	9,377
43. Total Annual CAP Billed Amount - (used to calculate Average CAP Bills) (\$)	\$13,972,031
44. Total Number of CAP Bills Rendered by Month (#)	
January	24,387
February	21,331
March	23,540
April	23,728
May	25,973
June	24,167
July	23,869
August	24,881
September	21,894
October	24,495
November	22,203
December	20,567
45. Total Cash Payments by CAP Customers (\$)	\$10,262,398
46. Number of Full, On-Time Payments (#)	135,950
46. A. Source of Intake	
Distribution Company	1,648
Community-Based Organization	7,747
Other	0
46.B. Participants in Multiple Programs	
CAP and LIURP	341
CAP and CARES	23
CAP and Hardship Funds	291
CAP, LIURP, CARES	1
CAP, LIURP, Hardship Fund	6
CAP, CARES and Hardship Fund	4
CAP, LIURP, CARES and Hardship Fund	1

Universal Services Reporting Requirements - 2018

CARES	Value
47. Program Costs (\$)	\$336,931
48. Number of Family Members Under Age 18	0.40
49. Number of Family Members Over Age 62	1.53
50. Family Size	1.9
51. Income (\$)	\$24,186
52. Source of Income	
Employment	25
Public Assistance	0
Pension/Retirement	46
Unemployment Compensation	2
Disability	16
Other (Includes Missing Data)	7
53. Participation Levels By Month	
January	146
February	120
March	119
April	107
May	106
June	124
July	105
August	99
September	82
October	106
November	124
December	89
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)	\$2,209
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)	11
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)	\$1,557
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)	7
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (CARES)	\$5,759,108
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)	18,703
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	\$1,058,490
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	3,905
62. Direct Dollars Applied to CARES Account (\$)	\$54,225
63. Direct Dollars Applied to Cases Account (#)	79
64. CARES Benefits (#) - Number of Customers Referred to CARES	667
65. CARES Benefits (#) - Number of Customers Accepted into CARES	95
65.A. Source of Intake	
Distribution Company	667
Community-Based Organization	0
Other	0
65.B. Participants in Multiple Programs	
CARES and LIURP	3
CARES and CAP	23
CARES and Hardship Fund	39
CARES, LIURP and CAP	1
CARES, LIURP and Hardship Fund	3
CARES, CAP and Hardship Fund	4
CARES, LIURP, CAP and Hardship Fund	1

Universal Services Reporting Requirements - 2018

HARDSHIP	Value
66. Program Costs (Administrative Costs Only)	
Administrative Costs from Rate Base (\$)	\$71,970
Administrative Costs from Shareholders (\$)	0
67. Number of Family Memembers Under Age 18	0.97
68. Number of Family Members Over Age 62	0.34
69. Family Size	2.57
70. Income (\$)	\$25,872
71. Source of Income	
Employment	656
Public Assistance	2
Pension/Retirement	290
Unemployment Compensation	29
Disability	157
Other (Including Missing Data)	66
72. Participant Levels By Month (#)	
November	183
December	7
January	6
February	40
March	234
April	184
May	185
June	127
July	89
August	107
September	38
October	0
73. Ratepayer/Employee Contributions (\$)	\$375,000
74. Special Contributions (\$)	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0
75. Utility Contributions (\$) - Initial grant (excluding admin. \$ and grants dependent on ratepayer match)	\$0
76. Utility Contributions (\$) - (excluding #66 and #75)	\$150,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	\$150,000
78. Outreach Contacts (Name of Agency, Address and Telephone # by County)	This is a separate list.
Hardship Fund Benefits	
79. Cash Benefits (#)	1,200
80. Cash Benefits (\$)	\$487,716
80.A. Source of Intake	
Distribution Company	0
Community-Based Organization	1,200
Other	0
80.B. Participants in Multiple Programs	
Hardship Fund and LIURP	15
Hardship Fund and CAP	291
Hardship Fund and CARES	39
Hardship Fund, LIURP and CAP	6
Hardship Fund, LIURP and CARES	3
Hardship Fund, CARES and CAP	4
Hardship Fund, LIURP, CAP and CARES	1

Universal Services Reporting Requirements - 2019

Collections		All Residential	Conf. Low Income	
1. Total Number(#) - Payment Arrangements		27,086	15,977	
2. Total Number (#) - Successful Payment Arrangements		9,037	4,547	
3. Annual Collection Operating Expenses (\$)		\$5,042,206	\$2,446,978	
4. Total Dollar Amount (\$) - Gross Residential Write-Offs		\$8,903,865	\$4,440,413	
5. Total Dollar Amount (\$) - Net Residential Write Offs		\$5,283,569	\$2,663,602	
6. Total Number (#) Residential Customers - By Month				
January		400,835	69,521	
February		401,135	69,759	
March		401,310	69,727	
April		400,416	69,138	400,043
May		399,272	68,127	
June		398,404	67,716	
July		397,732	66,887	67,582
August		397,604	65,676	
September		398,046	65,586	
October		400,099	65,668	
November		402,307	66,346	
December		403,359	66,833	
7. A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month				
January		13,539	6,905	
February		15,903	7,876	
March		18,550	8,832	
April		20,434	9,323	
May		20,904	9,257	16,875
June		20,487	8,901	
July		19,344	8,333	
August		17,771	7,767	7,877
September		16,055	7,316	
October		14,459	7,001	
November		12,709	6,539	
December		12,344	6,475	
7. B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month				
January		12,631	4,902	
February		10,864	4,498	
March		7,673	2,525	
April		6,106	1,875	
May		9,974	2,578	10,572
June		8,205	2,126	
July		11,923	3,001	
August		12,191	3,037	3,115
September		11,915	2,989	
October		12,288	3,135	
November		11,593	3,116	
December		11,500	3,599	
8. A. Total Dollar Amount (\$) Residential Accounts in Arrears on Agreements - By Month				
January		\$10,187,999	\$5,667,715	
February		\$13,574,761	\$7,295,279	
March		\$16,415,125	\$8,562,923	
April		\$16,874,692	\$8,470,963	
May		\$15,545,628	\$7,698,871	\$11,265,336
June		\$13,294,836	\$6,621,396	
July		\$11,004,676	\$5,552,083	
August		\$9,033,247	\$4,709,342	
September		\$7,513,030	\$4,069,107	\$5,947,599
October		\$6,703,860	\$3,902,154	
November		\$6,712,144	\$3,974,420	
December		\$8,324,030	\$4,846,932	

Collections		All Residential	Conf. Low Income
8. B. Total Dollar Amount (\$) Residential Accounts in Arrears not on Agreements - By Month			
January		\$6,433,943	\$2,495,706
February		\$7,304,924	\$2,787,724
March		\$6,673,870	\$2,245,507
April		\$5,038,952	\$1,443,403

Universal Services Reporting Requirements - 2019

May	\$4,415,174	\$1,181,237	
June	\$2,216,011	\$667,996	
July	\$2,108,194	\$629,568	\$3,674,251
August	\$1,771,045	\$499,080	
September	\$1,602,228	\$470,971	
October	\$1,645,175	\$512,319	\$1,209,704
November	\$1,789,949	\$564,794	
December	\$3,091,544	\$1,018,140	

9. Total Number (#) Residential Payment Troubled Customers - By Month

January	9,870	5,543	
February	10,378	5,857	
March	11,541	6,600	
April	13,056	7,438	
May	14,805	8,337	
June	15,847	8,907	14,328
July	16,345	9,269	
August	16,616	9,496	8,332
September	16,093	9,485	
October	15,630	9,411	
November	15,343	9,469	
December	16,415	10,172	

10. Total Number (#) Terminations - By Month

January	2	1	
February	6	0	
March	8	1	
April	1,934	990	
May	1,958	1,057	
June	1,817	988	10,770
July	1,600	934	
August	1,339	806	
September	1,018	614	6,067
October	756	480	
November	332	196	
December	0	0	

11. Total Number (#) Reconnections - By Month

January	81	41	
February	31	13	
March	14	3	
April	604	293	
May	804	406	6,153
June	677	345	
July	570	307	
August	703	378	3134
September	700	407	
October	1,036	499	
November	778	381	
December	155	61	

12. Total Number (#) Low Income Households (Accounts) (Estimated)

Submit Estimation Methodology in a Separate Document

12. B. Annual Residential Revenues (\$)	\$431,312,024	\$78,879,165
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Universal Services Reporting Requirements - 2019

LIURP		Value
13. Program Costs (\$)/Actual Spending for the Year Just Completed		\$5,228,706
14. Number of Family Members Under Age 18		0.07%
15. Number of Family Members Over Age 62		0.58%
16. Family Size		2.55%
17. Income (\$)		\$16,740
18. Source of Income		
Employment		150
Public Assistance		9
Pension/Retirement		112
Unemployment Compensation		2
Disability		98
Other (Includes Missing Data)		126
19. Participation Levels By Month (#) - Reporting Year		
Heating Jobs		
January		28
February		48
March		48
April		48
May		34
June		45
July		53
August		40
September		51
October		45
November		36
December		21
Water Heating Jobs		
January		0
February		0
March		0
April		0
May		0
June		0
July		0
August		0
September		0
October		0
November		0
December		0
Baseload Jobs		
January		0
February		0
March		0
April		0
May		0
June		0
July		0
August		0
September		0
October		0
November		0
December		0
20. Projected Spending for Current Year - (\$)		\$4,955,929
21. Projected Annual Production Number (#) - Current Year		
Heating Jobs		497
Water Heating Jobs		0
Baseload Jobs		0

Universal Services Reporting Requirements - 2019

LIURP		Value
22. Average Job Costs (\$)		
Heating Jobs		\$8,138
Water Heating Jobs		0
Baseload Jobs		0
22 A. Source of Intake		
Distribution Company		497
Community Based Organization		0
Other		0
22 B. Participants in Multiple Programs		
LIURP and CAP		1239
LIURP and CARES		9
LIURP and Hardship Fund		23
LIURP, CAP and CARES		5
LIURP, CAP and Hardship Fund		9
LIURP, CARES and Hardship Fund		3
LIURP, CAP, CARES and Hardship Fund		1

Universal Services Reporting Requirements - 2019

CAP	Value	
23. Program Costs - Administration (\$)	\$724,643	
24. Program Costs - CAP Credits (\$)	\$17,970,920	
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$1,837,043	
Program Costs - CAP Accounts in Arrears (\$)		
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	\$0.00	
26.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (\$)	\$0.00	
Program Costs - CAP Accounts in Arrears (#)		
27.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0	
27.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (#)	0	
28. Number of Family Members Under Age 18	1.09	
29. Number of Family Members Over Age 62	1.53	
30. Family Size	2.62	
31. Income (\$)	\$16,127	
32. Source of Income		
Employment	10,485	
Public Assistance	557	
Pension/Retirement	10,112	Total
Unemployment Compensation	603	29352
Disability	2,885	
Other (Includes Missing Data)	4,710	
Participation Levels By Month		
33. Income at or below 50% of Poverty (#)		
January	5,067	
February	5,373	
March	5,451	
April	5,526	
May	5,578	
June	5,534	
July	5,395	
August	5,297	
September	5,173	
October	5,000	
November	5,083	
December	5,082	
34. Income between 51% and 100% of Poverty (#)		
January	10,358	
February	11,008	
March	11,045	
April	11,085	
May	10,975	
June	10,855	
July	10,521	
August	10,364	
September	10,181	
October	9,999	
November	10,030	
December	10,044	
35. Income between 101% and 150% of Poverty (#)		
January	7,403	
February	7,661	
March	7,786	
April	8,053	
May	7,988	
June	7,904	
July	7,836	
August	7,650	
September	7,537	
October	7,599	
November	7,587	
December	7,581	
CAP		
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	1,014	
Value		

Universal Services Reporting Requirements - 2019

37. Participation Levels: Default Exits - Income between 51% and 100% of Poverty (#)	1,667
38. Participation Levels: Default Exits - Income between 101% and 150% of Poverty (#)	1,428
39. Participation Levels: Exits other than Defaults (#)	3,113
40. Energy Assistance Benefits (\$)	\$2,470,017
41. Energy Assistance Benefits (#)	9,771
42. Number of Full CAP Payments by Month	
January	9,832
February	9,946
March	11,313
April	12,754
May	14,013
June	13,392
July	15,525
August	16,102
September	15,405
October	16,482
November	12,069
December	9,678
43. Total Annual CAP Billed Amount - (used to calculate Average CAP Bills) (\$)	\$14,299,197
44. Total Number of CAP Bills Rendered by Month (#)	
January	24,787
February	21,328
March	23,305
April	23,562
May	25,575
June	21,688
July	24,891
August	23,341
September	21,761
October	23,446
November	20,730
December	20,349
45. Total Cash Payments by CAP Customers (\$)	\$11,006,661
46. Number of Full, On-Time Payments (#)	133,268
46. A. Source of Intake	
Distribution Company	1,637
Community-Based Organization	6,828
Other	0
46.B. Participants in Multiple Programs	
CAP and LIURP	1,239
CAP and CARES	41
CAP and Hardship Funds	306
CAP, LIURP, CARES	5
CAP, LIURP, Hardship Fund	9
CAP, CARES and Hardship Fund	5
CAP, LIURP, CARES and Hardship Fund	1

Universal Services Reporting Requirements - 2019

CARES	Value
47. Program Costs (\$)	\$350,513
48. Number of Family Members Under Age 18	0.35
49. Number of Family Members Over Age 62	0.8
50. Family Size	1.93
51. Income (\$)	\$24,029
52. Source of Income	
Employment	36
Public Assistance	1
Pension/Retirement	61
Unemployment Compensation	0
Disability	17
Other (Includes Missing Data)	4
53. Participation Levels By Month	
January	100
February	109
March	127
April	105
May	111
June	108
July	124
August	93
September	94
October	114
November	113
December	72
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)	\$3,618
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)	12
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)	\$2,936
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)	6
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (CARES)	\$4,655,938
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)	17,537
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	\$715,969
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	2,408
62. Direct Dollars Applied to CARES Account (\$)	\$58,136
63. Direct Dollars Applied to Cases Account (#)	93
64. CARES Benefits (#) - Number of Customers Referred to CARES	824
65. CARES Benefits (#) - Number of Customers Accepted into CARES	120
65.A. Source of Intake	
Distribution Company	824
Community-Based Organization	0
Other	0
65.B. Participants in Multiple Programs	
CARES and LIURP	9
CARES and CAP	41
CARES and Hardship Fund	40
CARES, LIURP and CAP	5
CARES, LIURP and Hardship Fund	3
CARES, CAP and Hardship Fund	5
CARES, LIURP, CAP and Hardship Fund	1

Universal Services Reporting Requirements - 2019

HARDSHIP		Value
66. Program Costs (Administrative Costs Only)		
Administrative Costs from Rate Base (\$)		\$73,303
Administrative Costs from Shareholders (\$)		\$0
67. Number of Family Memebers Under Age 18		1.00
68. Number of Family Members Over Age 62		0.33
69. Family Size		2.58
70. Income (\$)		\$26,119
71. Source of Income		
Employment		594
Public Assistance		8
Pension/Retirement		262
Unemployment Compensation		18
Disability		130
Other (Including Missing Data)		67
72. Participant Levels By Month (#)		
November		83
December		3
January		0
February		22
March		190
April		155
May		174
June		124
July		106
August		110
September		112
October		0
73. Ratepayer/Employee Contributions (\$)		\$375,000
74. Special Contributions (\$)		
Citizens Energy Corporation		\$0
Companies Other Than Utilities		\$0
Settlements and Fines		\$0
Other		\$0
75. Utility Contributions (\$) - Initial grant (excluding admin. \$ and grants dependent on ratepayer match)		\$0
76. Utility Contributions (\$) - (excluding #66 and #75)		\$150,000
77. Utilty Contributions (\$) - (dependent upon a match from customer contributions)		\$150,000
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) - This is a separate list.		
Hardship Fund Benefits		
79. Cash Benefits (#)		1075 - needs to match 80 A
80. Cash Benefits (\$)		\$426,042
80.A. Source of Intake		
Distribution Company		0
Community-Based Organization		1,079
Other		0
80.B. Participants in Multiple Programs		
Hardship Fund and LIURP		23
Hardship Fund and CAP		306
Hardship Fund and CARES		40
Hardship Fund, LIURP and CAP		9
Hardship Fund, LIURP and CARES		3
Hardship Fund, CARES and CAP		5
Hardship Fund, LIURP, CAP and CARES		1

Universal Services Reporting Requirements - 2020

Collections	All Residential	Conf. Low Income
1. Total Number(#) - Payment Arrangements	20,541	12,041
2. Total Number (#) - Successful Payment Arrangements	6,912	3,450
3. Annual Collection Operating Expenses (\$)	\$2,000,716	\$616,043
4. Total Dollar Amount (\$) - Gross Residential Write-Offs	\$4,204,533	\$2,250,506
5. Total Dollar Amount (\$) - Net Residential Write Offs	\$2,771,910	\$1,496,813
6. Total Number (#) Residential Customers - By Month		
January	403,973	66,999
February	404,214	68,115
March	404,447	68,293
April	404,687	68,448
May	404,910	68,534
June	405,186	68,382
July	405,487	68,059
August	405,794	68,049
September	406,312	67,790
October	407,011	67,811
November	407,615	67,993
December	408,198	68,457
7. A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month		
January	13,439	6,893
February	15,686	7,981
March	17,205	8,523
April	17,594	8,727
May	17,574	8,747
June	17,475	8,717
July	17,031	8,525
August	16,165	2,756
September	14,681	7,737
October	12,979	7,063
November	11,561	6,349
December	11,090	6,175
7. B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month		
January	12,658	4,561
February	10,466	5,809
March	1	0
April	0	0
May	0	0
June	0	0
July	0	0
August	9,227	2,645
September	17,117	4,776
October	15,657	4,473
November	16,230	4,845
December	17,450	5,158
8. A. Total Dollar Amount (\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$10,681,198	\$6,058,712
February	\$13,194,015	\$7,405,866
March	\$15,059,605	\$8,197,005
April	\$15,777,021	\$8,651,355
May	\$15,605,138	\$8,666,727
June	\$15,101,648	\$8,536,599
July	\$14,124,057	\$8,102,418
August	\$13,205,061	\$7,730,223
September	\$12,068,530	\$7,299,078
October	\$11,250,869	\$6,963,406
November	\$10,712,376	\$6,694,540
December	\$11,738,384	\$7,316,447

Universal Services Reporting Requirements - 2020

Collections		All Residential	Conf. Low Income
8. B. Total Dollar Amount (\$) Residential Accounts in Arrears not on Agreements - By Month			
January		\$6,199,088	\$2,215,455
February		\$6,685,427	\$2,368,069
March		\$25,276	\$16,913
April		\$3,052	\$2,313
May		\$1,495	\$157
June		\$10,843	\$9,776
July		\$2,287	\$599
August		\$3,732,566	\$1,418,355
September		\$6,788,712	\$2,508,889
October		\$6,339,607	\$2,340,309
November		\$7,052,728	\$2,684,731
December		\$9,014,420	\$3,192,751
9. Total Number (#) Residential Payment Troubled Customers - By Month			
January		9,789	5,692
February		9,840	5,797
March		11,844	6,882
April		12,663	7,441
May		12,938	7,662
June		13,788	8,173
July		14,149	8,352
August		14,329	8,640
September		14,089	8,653
October		13,524	8,418
November		13,133	8,276
December		13,218	8,285
10. Total Number (#) Terminations - By Month			
January		3	0
February		4	0
March		5	0
April		0	0
May		0	0
June		0	0
July		0	0
August		0	0
September		0	0
October		0	0
November		0	0
December		0	0
11. Total Number (#) Reconnections - By Month			
January		40	12
February		28	9
March		22	6
April		14	5
May		6	0
June		6	1
July		9	1
August		7	2
September		32	1
October		23	5
November		27	4
December		21	5
12. Total Number (#) Low Income Households (Accounts) (Estimated)		96,648	
<i>Submit Estimation Methodology in a Separate Document</i>			
12. B. Annual Residential Revenues (\$)		\$399,445,838	\$71,720,644

Universal Services Reporting Requirements - 2020

LIURP	Value
13. Program Costs (\$)/Actual Spending for the Year Just Completed	\$2,510,577
14. Number of Family Members Under Age 18	1.26
15. Number of Family Members Over Age 62	0.48
16. Family Size	2.75
17. Income (\$)	\$18,705
18. Source of Income	
Employment	103
Public Assistance	7
Pension/Retirement	27
Unemployment Compensation	10
Disability	41
Other (Includes Missing Data)	69
19. Participation Levels By Month (#) - Reporting Year	
Heating Jobs	
January	57
February	16
March	24
April	0
May	0
June	12
July	31
August	19
September	19
October	34
November	24
December	21
Water Heating Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Baseload Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
20. Projected Spending for Current Year - (\$)	\$7,320,352
21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	749
Water Heating Jobs	0
Baseload Jobs	0

Universal Services Reporting Requirements - 2020

LIURP		Value
22. Average Job Costs (\$)		
Heating Jobs		\$7,207
Water Heating Jobs		0
Baseload Jobs		0
22 A. Source of Intake		
Distribution Company		257
Community Based Organization		0
Other		0
22 B. Participants in Multiple Programs		
LIURP and CAP		199
LIURP and CARES		0
LIURP and Hardship Fund		5
LIURP, CAP and CARES		0
LIURP, CAP and Hardship Fund		4
LIURP, CARES and Hardship Fund		0
LIURP, CAP, CARES and Hardship Fund		0

Universal Services Reporting Requirements - 2020

CAP	Value
23. Program Costs - Administration (\$)	\$726,617
24. Program Costs - CAP Credits (\$)	\$14,619,229
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$1,054,724
Program Costs - CAP Accounts in Arrears (\$)	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	\$0.00
26.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (\$)	\$0.00
Program Costs - CAP Accounts in Arrears (#)	
27.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.05
29. Number of Family Members Over Age 62	1.51
30. Family Size	2.6
31. Income (\$)	\$13,827
32. Source of Income	
Employment	8,122
Public Assistance	454
Pension/Retirement	9,260
Unemployment Compensation	1,129
Disability	2,854
Other (Includes Missing Data)	4,279
Participation Levels By Month	
33. Income at or below 50% of Poverty (#)	
January	5,079
February	5,152
March	5,239
April	5,311
May	5,543
June	5,434
July	5,462
August	5,453
September	5,463
October	5,493
November	5,575
December	5,562
34. Income between 51% and 100% of Poverty (#)	
January	10,245
February	10,369
March	10,474
April	10,387
May	10,516
June	10,446
July	10,407
August	10,364
September	10,335
October	10,278
November	10,417
December	10,381
35. Income between 101% and 150% of Poverty (#)	
January	7,396
February	7,405
March	7,449
April	7,559
May	7,588
June	7,508
July	7,532
August	7,484
September	7,480
October	7,556
November	7,404
December	7,599

Universal Services Reporting Requirements - 2020

CAP	Value
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	110
37. Participation Levels: Default Exits - Income between 51% and 100% of Poverty (#)	224
38. Participation Levels: Default Exits - Income between 101% and 150% of Poverty (#)	242
39. Participation Levels: Exits other than Defaults (#)	2,341
40. Energy Assistance Benefits (\$)	\$2,550,730
41. Energy Assistance Benefits (#)	9,592
42. Number of Full CAP Payments by Month	
January	9,031
February	9,423
March	10,466
April	11,887
May	12,125
June	12,898
July	13,726
August	13,139
September	13,756
October	13,901
November	12,223
December	9,851
43. Total Annual CAP Billed Amount - (used to calculate Average CAP Bills) (\$)	\$14,198,242
44. Total Number of CAP Bills Rendered by Month (#)	
January	23,808
February	20,485
March	24,187
April	23,357
May	22,410
June	23,704
July	23,913
August	23,108
September	23,065
October	24,772
November	20,627
December	23,180
45. Total Cash Payments by CAP Customers (\$)	\$9,995,468
46. Number of Full, On-Time Payments (#)	138,189
46. A. Source of Intake	
Distribution Company	699
Community-Based Organization	4,209
Other	0
46.B. Participants in Multiple Programs	
CAP and LIURP	199
CAP and CARES	23
CAP and Hardship Funds	495
CAP, LIURP, CARES	0
CAP, LIURP, Hardship Fund	4
CAP, CARES and Hardship Fund	1
CAP, LIURP, CARES and Hardship Fund	0

Universal Services Reporting Requirements - 2020

CARES	Value
47. Program Costs (\$)	\$366,306
48. Number of Family Members Under Age 18	0.27
49. Number of Family Members Over Age 62	0.74
50. Family Size	1.73
51. Income (\$)	\$22,751
52. Source of Income	
Employment	17
Public Assistance	1
Pension/Retirement	46
Unemployment Compensation	2
Disability	3
Other (Includes Missing Data)	3
53. Participation Levels By Month	
January	64
February	60
March	63
April	55
May	49
June	50
July	51
August	51
September	57
October	51
November	53
December	48
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)	\$1,516
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)	8
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)	\$1,361
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)	7
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (CARES)	\$4,531,921
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)	16,496
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	\$1,206,495
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	4,222
62. Direct Dollars Applied to CARES Account (\$)	\$40,421
63. Direct Dollars Applied to CARES Account (#)	56
64. CARES Benefits (#) - Number of Customers Referred to CARES	353
65. CARES Benefits (#) - Number of Customers Accepted into CARES	72
65.A. Source of Intake	
Distribution Company	353
Community-Based Organization	0
Other	0
65.B. Participants in Multiple Programs	
CARES and LIURP	0
CARES and CAP	23
CARES and Hardship Fund	23
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	1
CARES, LIURP, CAP and Hardship Fund	0

Universal Services Reporting Requirements - 2020

HARDSHIP		Value
66. Program Costs (Administrative Costs Only)		
Administrative Costs from Rate Base (\$)		\$67,043
Administrative Costs from Shareholders (\$)		\$0
67. Number of Family Memembers Under Age 18		1.02
68. Number of Family Members Over Age 62		0.3
69. Family Size		2.56
70. Income (\$)		\$22,044
71. Source of Income		
Employment		527
Public Assistance		9
Pension/Retirement		255
Unemployment Compensation		81
Disability		170
Other (Including Missing Data)		154
72. Participant Levels By Month (#)		
November		243
December		21
January		47
February		64
March		111
April		137
May		157
June		66
July		53
August		95
September		202
October		0
73. Ratepayer/Employee Contributions (\$)		\$436,601
74. Special Contributions (\$)		
Citizens Energy Corporation		\$0
Companies Other Than Utilities		\$0
Settlements and Fines		\$0
Other		\$0
75. Utility Contributions (\$) - Initial grant (excluding admin. \$ and grants dependent on ratepayer match)		\$0
76. Utility Contributions (\$) - (excluding #66 and #75)		\$150,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)		\$150,000
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) - This is a separate list.		
Hardship Fund Benefits		
79. Cash Benefits (#)		1,196
80. Cash Benefits (\$)		\$487,716
80.A. Source of Intake		
Distribution Company		0
Community-Based Organization		1,196
Other		0
80.B. Participants in Multiple Programs		
Hardship Fund and LIURP		5
Hardship Fund and CAP		495
Hardship Fund and CARES		23
Hardship Fund, LIURP and CAP		4
Hardship Fund, LIURP and CARES		0
Hardship Fund, CARES and CAP		1
Hardship Fund, LIURP, CAP and CARES		0

Universal Services Reporting Requirements - 2021

Collections	All Residential	Conf. Low Income
1. Total Number(#) - Payment Arrangements	28,064	16,556
2. Total Number (#) - Successful Payment Arrangements	8,715	4,598
3. Annual Collection Operating Expenses (\$)	\$3,087,170	\$1,010,810
4. Total Dollar Amount (\$) - Gross Residential Write-Offs	\$10,761,148	\$4,750,005
5. Total Dollar Amount (\$) - Net Residential Write Offs	\$7,388,943	\$3,298,227
6. Total Number (#) Residential Customers - By Month		
January	408,607	68,430
February	408,888	69,493
March	408,939	69,583
April	409,320	69,554
May	407,730	68,669
June	406,476	67,877
July	406,184	67,283
August	406,232	67,093
September	406,503	66,755
October	407,413	66,917
November	408,727	67,886
December	409,683	68,480
7. A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month		
January	11,581	6,309
February	12,678	6,814
March	13,646	7,059
April	15,435	7,578
May	18,327	8,411
June	18,811	8,605
July	18,177	8,279
August	16,602	7,585
September	14,721	6,777
October	12,750	6,016
November	11,380	5,443
December	11,113	5,496
7. B. Total Number (#) Residential Accounts in Arrears not on Agreements - By Month		
January	16,635	5,192
February	2,338	698
March	11,546	3,609
April	11,316	3,173
May	10,505	2,646
June	10,218	1,998
July	9,861	2,192
August	10,070	2,253
September	10,177	2,304
October	10,206	2,401
November	9,620	2,305
December	11,138	2,905
8. A. Total Dollar Amount (\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$13,521,871	\$8,307,302
February	\$16,059,499	\$9,757,182
March	\$17,656,537	\$10,380,534
April	\$19,303,098	\$10,728,591
May	\$20,864,432	\$10,672,037
June	\$19,855,434	\$10,149,749
July	\$17,513,390	\$9,002,376
August	\$14,939,939	\$7,769,604
September	\$12,562,702	\$6,564,865
October	\$10,915,732	\$5,824,217
November	\$10,492,070	\$5,626,424
December	\$12,031,802	\$6,460,001

Universal Services Reporting Requirements - 2021

Collections	All Residential	Conf. Low Income
8. B. Total Dollar Amount (\$) Residential Accounts in Arrears not on Agreements - By Month		
January	\$11,441,529	\$4,010,034
February	\$2,015,837	\$609,075
March	\$11,263,681	\$3,816,851
April	\$9,660,989	\$3,132,199
May	\$6,722,336	\$2,078,566
June	\$3,476,404	\$1,040,409
July	\$2,342,545	\$722,229
August	\$1,846,390	\$570,798
September	\$1,718,603	\$562,710
October	\$1,606,386	\$526,819
November	\$1,669,725	\$579,593
December	\$3,574,818	\$1,140,806
9. Total Number (#) Residential Payment Troubled Customers - By Month		
January	13,268	8,463
February	9,102	5,611
March	9,324	5,647
April	10,647	6,390
May	12,651	7,309
June	15,093	8,669
July	16,541	9,413
August	17,214	9,952
September	17,178	10,069
October	16,842	10,148
November	16,600	10,180
December	18,027	11,027
10. Total Number (#) Terminations - By Month		
January	0	0
February	0	0
March	0	0
April	0	0
May	2525	1319
June	2374	1258
July	1298	744
August	1182	673
September	1095	665
October	871	529
November	410	287
December	5	0
11. Total Number (#) Reconnections - By Month		
January	10	1
February	11	4
March	8	2
April	2	0
May	755	380
June	914	521
July	665	388
August	650	357
September	752	424
October	887	469
November	662	347
December	187	98
12. Total Number (#) Low Income Households (Accounts) (Estimated)		
<i>Submit Estimation Methodology in a Separate Document</i>		
12. B. Annual Residential Revenues (\$)	\$477,280,261	\$42,914,462

Universal Services Reporting Requirements - 2021

LIURP	Value
13. Program Costs (\$)/Actual Spending for the Year Just Completed	\$3,463,108
14. Number of Family Members Under Age 18	1.08
15. Number of Family Members Over Age 62	0.41
16. Family Size	2.79
17. Income (\$)	\$21,923
18. Source of Income	
Employment	92
Public Assistance	7
Pension/Retirement	37
Unemployment Compensation	19
Disability	55
Other (Includes Missing Data)	97
19. Participation Levels By Month (#) - Reporting Year	
Heating Jobs	
January	25
February	14
March	20
April	9
May	28
June	19
July	27
August	33
September	30
October	31
November	39
December	32
Water Heating Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Baseload Jobs	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
20. Projected Spending for Current Year - (\$)	\$8,932,244
21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	792
Water Heating Jobs	0
Baseload Jobs	0

Universal Services Reporting Requirements - 2021

LIURP		Value
22. Average Job Costs (\$)		
Heating Jobs		\$6,216
Water Heating Jobs		0
Baseload Jobs		0
22 A. Source of Intake		
Distribution Company		307
Community Based Organization		0
Other		0
22 B. Participants in Multiple Programs		
LIURP and CAP		236
LIURP and CARES		1
LIURP and Hardship Fund		38
LIURP, CAP and CARES		0
LIURP, CAP and Hardship Fund		28
LIURP, CARES and Hardship Fund		0
LIURP, CAP, CARES and Hardship Fund		0

Universal Services Reporting Requirements - 2021

CAP	Value
23. Program Costs - Administration (\$)	\$751,262
24. Program Costs - CAP Credits (\$)	\$20,023,299
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$3,284,454
Program Costs - CAP Accounts in Arrears (\$)	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	\$0.00
26.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (\$)	\$0.00
Program Costs - CAP Accounts in Arrears (#)	
27.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.05
29. Number of Family Members Over Age 62	1.5
30. Family Size	2.55
31. Income (\$)	\$14,784
32. Source of Income	
Employment	8,448
Public Assistance	418
Pension/Retirement	9,588
Unemployment Compensation	1,532
Disability	3,002
Other (Includes Missing Data)	5,424
Participation Levels By Month	
33. Income at or below 50% of Poverty (#)	
January	9,240
February	5,622
March	5,718
April	6,293
May	6,149
June	6,231
July	6,522
August	6,705
September	6,318
October	6,889
November	6,663
December	6,883
34. Income between 51% and 100% of Poverty (#)	
January	8,098
February	10,450
March	10,606
April	10,458
May	10,659
June	10,614
July	10,440
August	10,224
September	10,463
October	10,074
November	10,280
December	10,214
35. Income between 101% and 150% of Poverty (#)	
January	5,967
February	7,455
March	7,514
April	7,377
May	7,524
June	7,531
July	7,437
August	7,402
September	7,476
October	7,274
November	7,328
December	7,362

Universal Services Reporting Requirements - 2021

CAP	
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	326
37. Participation Levels: Default Exits - Income between 51% and 100% of Poverty (#)	342
38. Participation Levels: Default Exits - Income between 101% and 150% of Poverty (#)	254
39. Participation Levels: Exits other than Defaults (#)	2,741
40. Energy Assistance Benefits (\$)	\$4,237,486
41. Energy Assistance Benefits (#)	10,031
42. Number of Full CAP Payments by Month	
January	10,623
February	9,730
March	12,616
April	12,653
May	13,199
June	15,001
July	15,710
August	16,703
September	14,426
October	12,652
November	10,252
December	8,230
43. Total Annual CAP Billed Amount - (used to calculate Average CAP Bills) (\$)	\$15,258,779
44. Total Number of CAP Bills Rendered by Month (#)	
January	22,695
February	21,714
March	26,309
April	24,138
May	23,672
June	25,011
July	24,391
August	25,120
September	24,259
October	24,242
November	23,488
December	23,839
45. Total Cash Payments by CAP Customers (\$)	\$11,734,002
46. Number of Full, On-Time Payments (#)	150,457
46. A. Source of Intake	
Distribution Company	177
Community-Based Organization	5,692
Other	0
46.B. Participants in Multiple Programs	
CAP and LIURP	236
CAP and CARES	9
CAP and Hardship Funds	2,406
CAP, LIURP, CARES	0
CAP, LIURP, Hardship Fund	28
CAP, CARES and Hardship Fund	3
CAP, LIURP, CARES and Hardship Fund	0

Universal Services Reporting Requirements - 2021

CARES	Value
47. Program Costs (\$)	\$323,436
48. Number of Family Members Under Age 18	0.18
49. Number of Family Members Over Age 62	0.76
50. Family Size	1.78
51. Income (\$)	\$20,866
52. Source of Income	
Employment	7
Public Assistance	0
Pension/Retirement	34
Unemployment Compensation	1
Disability	6
Other (Includes Missing Data)	1
53. Participation Levels By Month	
January	46
February	44
March	43
April	42
May	40
June	37
July	38
August	39
September	38
October	38
November	40
December	39
54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (CARES)	\$950
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)	2
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (CARES)	\$940
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)	1
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (CARES)	\$4,152,610
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)	15,461
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	\$1,008,584
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	2,318
62. Direct Dollars Applied to CARES Account (\$)	\$30,499
63. Direct Dollars Applied to Cases Account (#)	291
64. CARES Benefits (#) - Number of Customers Referred to CARES	779
65. CARES Benefits (#) - Number of Customers Accepted into CARES	49
65.A. Source of Intake	
Distribution Company	779
Community-Based Organization	0
Other	0
65.B. Participants in Multiple Programs	
CARES and LIURP	1
CARES and CAP	9
CARES and Hardship Fund	27
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	3
CARES, LIURP, CAP and Hardship Fund	0

Universal Services Reporting Requirements - 2021

HARDSHIP	Value
66. Program Costs (Administrative Costs Only)	
Administrative Costs from Rate Base (\$)	\$64,628
Administrative Costs from Shareholders (\$)	\$0
67. Number of Family Memembers Under Age 18	0.95
68. Number of Family Members Over Age 62	0.25
69. Family Size	2.4
70. Income (\$)	\$20,556
71. Source of Income	
Employment	1,215
Public Assistance	21
Pension/Retirement	662
Unemployment Compensation	301
Disability	529
Other (Including Missing Data)	554
72. Participant Levels By Month (#)	
November	316
December	89
January	166
February	196
March	286
April	256
May	509
June	458
July	392
August	347
September	267
October	0
73. Ratepayer/Employee Contributions (\$)	\$375,000
74. Special Contributions (\$)	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0
75. Utility Contributions (\$) - Initial grant (excluding admin. \$ and grants dependent on ratepayer match)	\$0
76. Utility Contributions (\$) - (excluding #66 and #75)	\$150,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	\$150,000
78. Outreach Contacts (Name of Agency, Address and Telephone # by County) - This is a separate list.	
Hardship Fund Benefits	
79. Cash Benefits (#)	3,282
80. Cash Benefits (\$)	\$1,239,146
80.A. Source of Intake	
Distribution Company	0
Community-Based Organization	3,282
Other	0
80.B. Participants in Multiple Programs	
Hardship Fund and LIURP	38
Hardship Fund and CAP	2,406
Hardship Fund and CARES	27
Hardship Fund, LIURP and CAP	28
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	3
Hardship Fund, LIURP, CAP and CARES	0

US REPORTING REQUIREMENTS: CAP Participation Levels by Month No. 33 (income at or below 51% and 100% of Poverty) and No. 35 (income between 101% and 150% of Poverty)

2022

CAP MONTHLY PARTICIPATION								
POVERTY LEVEL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
< 51%	6,853	7,327	7,474					
> 50% AND < 101%	10,341	10,768	11,134					
>100% AND < 151%	7,472	6,933	6,927					

Total 24,666 25,028 **25,535** 0 0 **0** 0 0

Zero Income 2138 2249 2401

0.086678 0.089859 0.094028 #DIV/0! #DIV/0! #DIV/0! #DIV/0! #DIV/0!

/ 50% of Poverty), No. 34 (income between

SEP	OCT	NOV	DEC

0 0 0 0

#DIV/0! #DIV/0! #DIV/0! #DIV/0!

US REPORTING REQUIREMENTS: CAP Participation Levels by Month No. 33 (income at or below 51% and 100% of Poverty) and No. 35 (income between 101% and 150% of Poverty)

2021

CAP MONTHLY PARTICIPATION								
POVERTY LEVEL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
< 51%	9,240	5,622	5,718	6,293	6,149	6,231	6,522	6,705
> 50% AND < 101%	8,098	10,450	10,606	10,458	10,659	10,614	10,440	10,224
>100% AND < 151%	5,967	7,455	7,514	7,377	7,524	7,531	7,437	7,402

Total 23,305 23,527 **23,838** 24,128 24,332 **24,376** 24,399 24,331

Zero Income 1096 1152 1198 1270 1349 1425 1570 1619

0.047029 0.048965 0.050256 0.052636 0.055441 0.058459 0.064347 0.066541

/ 50% of Poverty), No. 34 (income between

SEP	OCT	NOV	DEC
6,318	6,889	6,663	6,883
10,463	10,074	10,280	10,214
7,476	7,274	7,328	7,362

24,257 24,237 24,271 **24,459**

1676 1837 1911 2020

0.069093 0.075793 0.078736 0.082587

US REPORTING REQUIREMENTS: CAP Participation Levels by Month No. 33 (income at or below 51% and 100% of Poverty) and No. 35 (income between 101% and 150% of Poverty)

2020

CAP MONTHLY PARTICIPATION								
POVERTY LEVEL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
< 51%	5,079	5,152	5,239	5,311	5,543	5,434	5,462	5,453
> 50% AND < 101%	10,245	10,369	10,474	10,387	10,516	10,446	10,407	10,364
>100% AND < 151%	7,396	7,405	7,449	7,559	7,588	7,508	7,532	7,484

Total 22,720 22,926 **23,162** 23,257 23,647 **23,388** 23,401 23,301

Zero Income 560 574 614 717 793 839 899 919

0.024648 0.025037 0.026509 0.030829 0.033535 0.035873 0.038417 0.03944

/ 50% of Poverty), No. 34 (income between

SEP	OCT	NOV	DEC
5,463	5,493	5,575	5,562
10,335	10,278	10,417	10,381
7,480	7,556	7,404	7,599

23,278 23,327 23,396 **23,542**

925 972 1031 1017

0.039737 0.041668 0.044067 0.043199

US REPORTING REQUIREMENTS: CAP Participation Levels by Month No. 33 (income at or below 51% and 100% of Poverty) and No. 35 (income between 101% and 150% of Poverty)

2019

CAP MONTHLY PARTICIPATION								
POVERTY LEVEL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
< 51%	5,067	5,373	5,451	5,526	5,578	5,534	5,395	5,297
> 50% AND < 101%	10,358	11,008	11,045	11,085	10,975	10,855	10,521	10,364
>100% AND < 151%	7,403	7,661	7,786	8,053	7,988	7,904	7,836	7,650

Total	22,828	24,042	24,282	24,664	24,541	24,293	23,752	23,311
Zero Income	439	436	397	515	545	562	561	575

/ 50% of Poverty), No. 34 (income between

SEP	OCT	NOV	DEC
5,173	5,000	5,083	5,082
10,181	9,999	10,030	10,044
7,537	7,599	7,587	7,581

22,891 22,598 22,700 **22,707**

575 583 576 584

US REPORTING REQUIREMENTS: CAP Participation Levels by Month No. 33 (income at or below 51% and 100% of Poverty) and No. 35 (income between 101% and 150% of Poverty)

2018

CAP MONTHLY PARTICIPATION								
POVERTY LEVEL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
< 51%	5,261	5,413	5,514	5,584	5,633	5,660	5,512	5,429
> 50% AND < 101%	10,677	10,900	11,011	11,067	11,167	11,116	10,830	10,630
>100% AND < 151%	7,561	7,788	7,975	8,292	8,288	8,253	8,230	8,022

Total 23,499 24,101 **24,500** 24,943 25,088 **25,029** 24,572 24,081

/ 50% of Poverty), No. 34 (income between

SEP	OCT	NOV	DEC
5,354	5,315	5,227	5,205
10,512	10,441	10,467	10,445
7,962	7,905	7,916	7,950

23,828 23,661 23,610 **23,600**

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX C

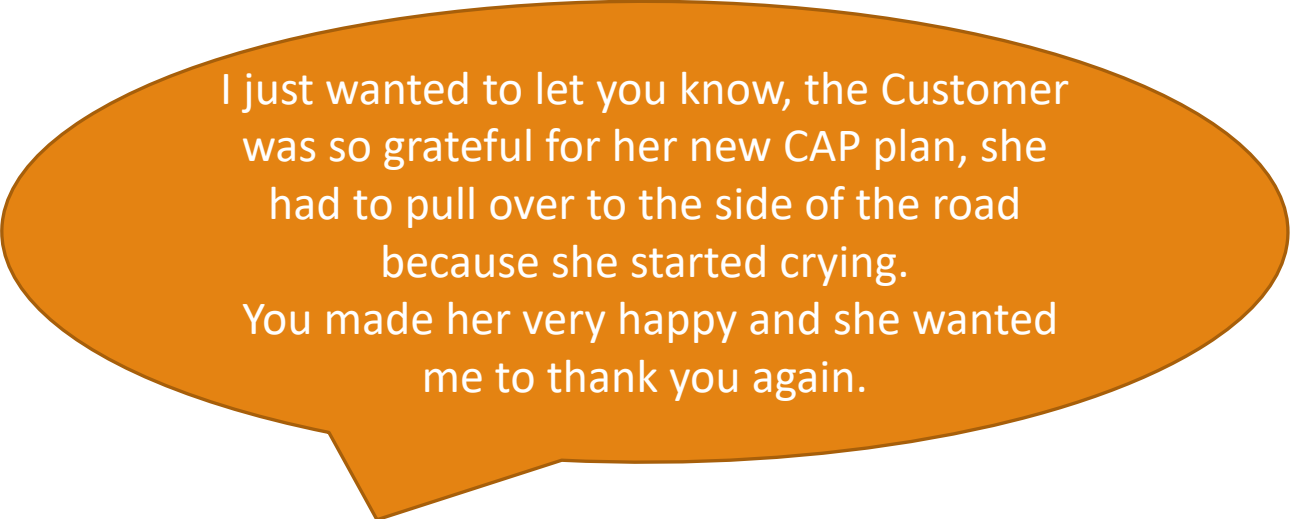
COLUMBIA GAS

UNIVERSAL SERVICE ADVISORY COUNCIL PRESENTATION

APRIL 2022

Columbia Gas Universal Service Advisory Council April 2022

Welcome!



I just wanted to let you know, the Customer was so grateful for her new CAP plan, she had to pull over to the side of the road because she started crying. You made her very happy and she wanted me to thank you again.

I am writing to tell you how thankful my husband and I are that we opted to apply for help through the Audits & Rebates Program through Columbia Gas of PA. All the folks we dealt with from the very beginning were professional, compassionate and friendly.

Introductions

Safety Message – Mindset Check in!



What is a Mindset Check In?

When meeting with others, add a mindset check in to the agenda. Allow each participant to share how they are feeling and to catch up with one another.

Example Conversation Starters:

- What is being celebrated in your life?
- What is going right or wrong lately?

Why is a Mindset Check In important?

"How you feel, determines how you show up,"

- Removes distractions, allows realistic expectations of others, "catch up", reminder that we are all human, gives everyone a voice.

- More information: <https://www.tlnt.com/for-more-productive-meetings-do-a-mindset-check-in-first/>

Agenda

Program Statistics

CAP Semi Annual Review

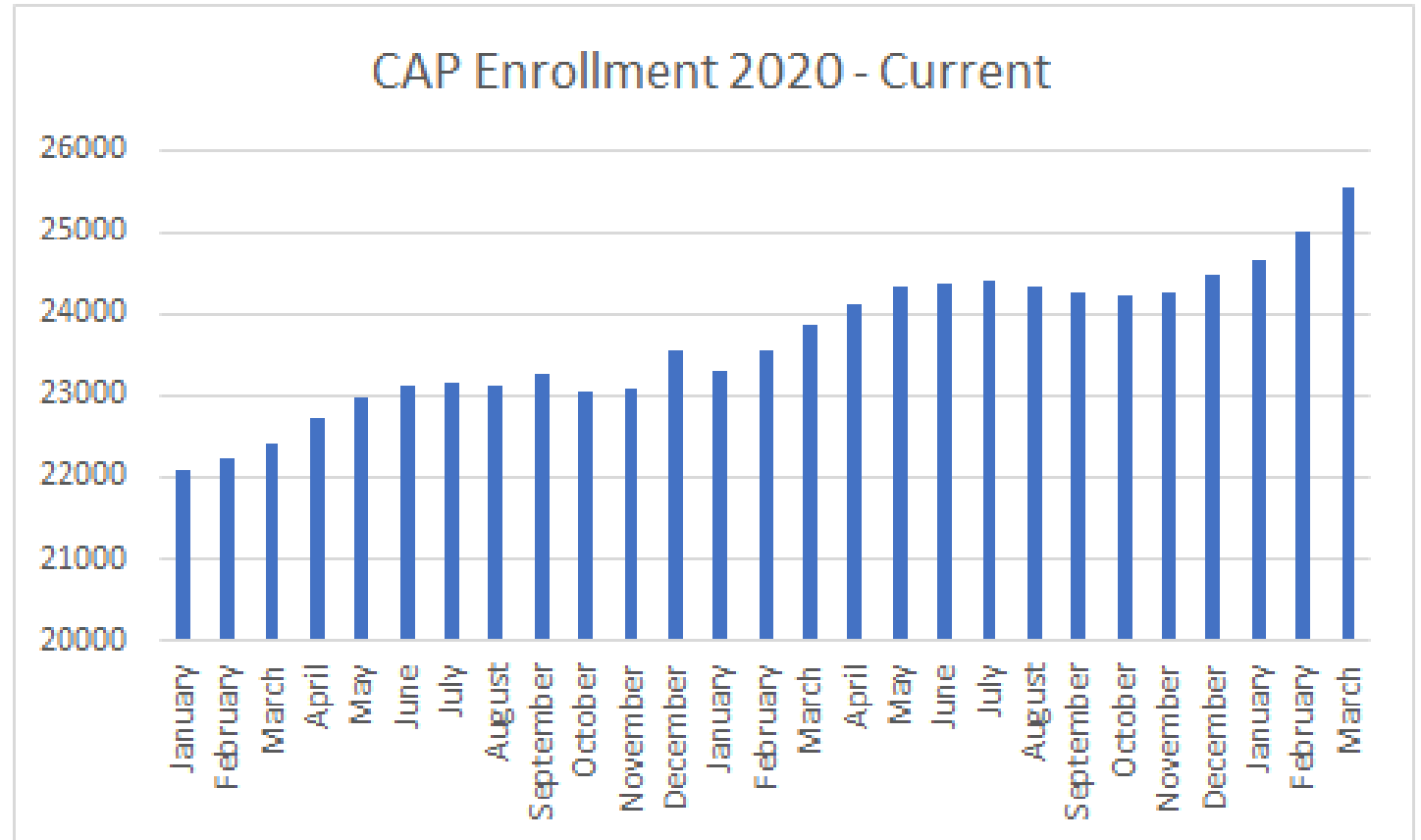
LIHEAP/CRISIS Update

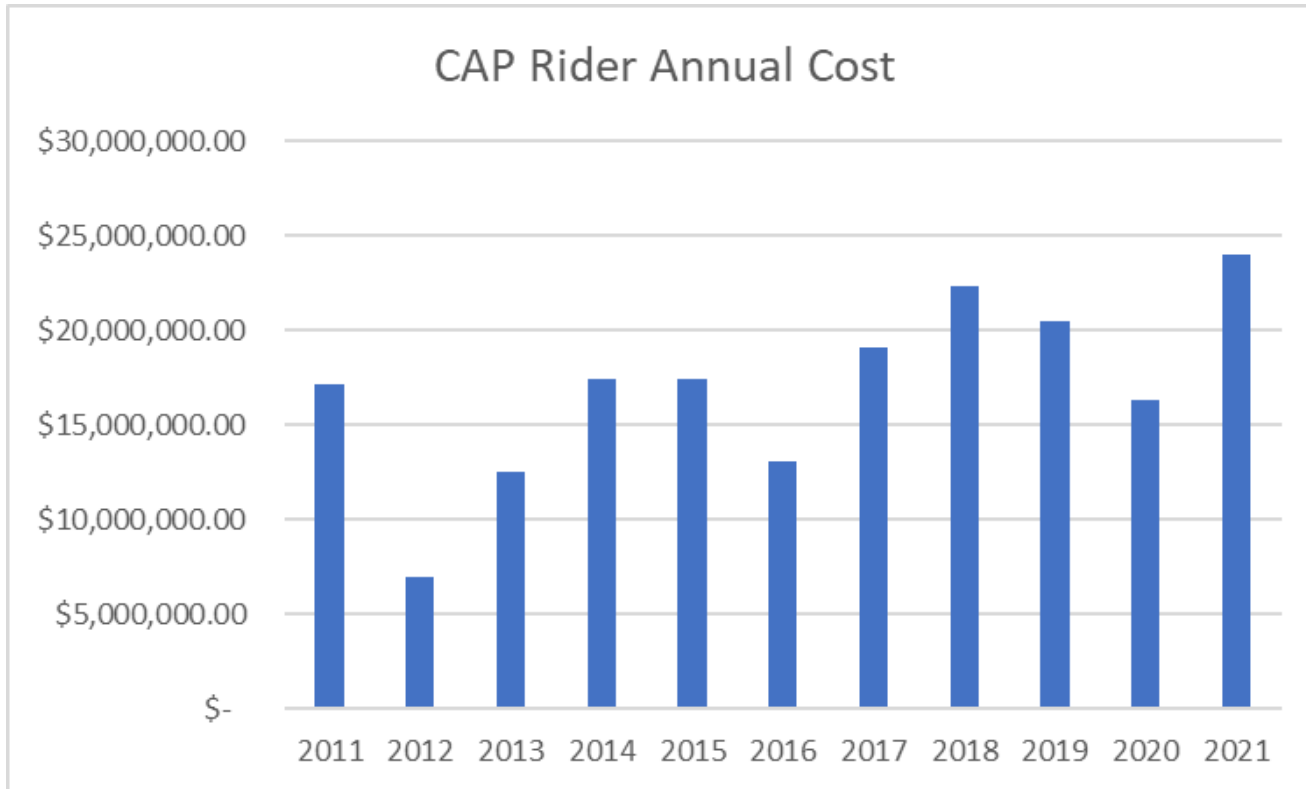
Outreach Update

Health & Safety Pilot Update

Roundtable

Current Statistics – CAP Enrollment

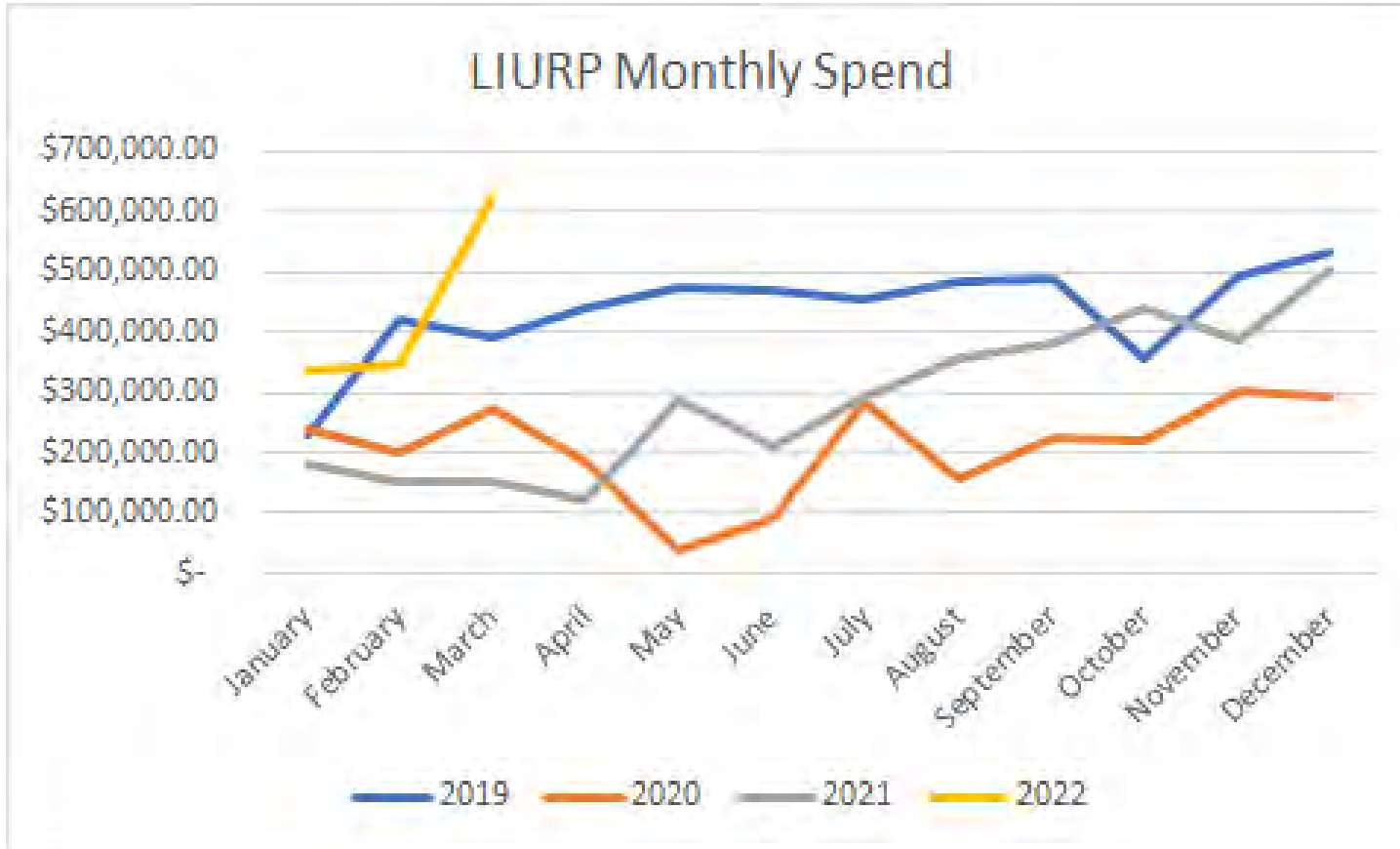


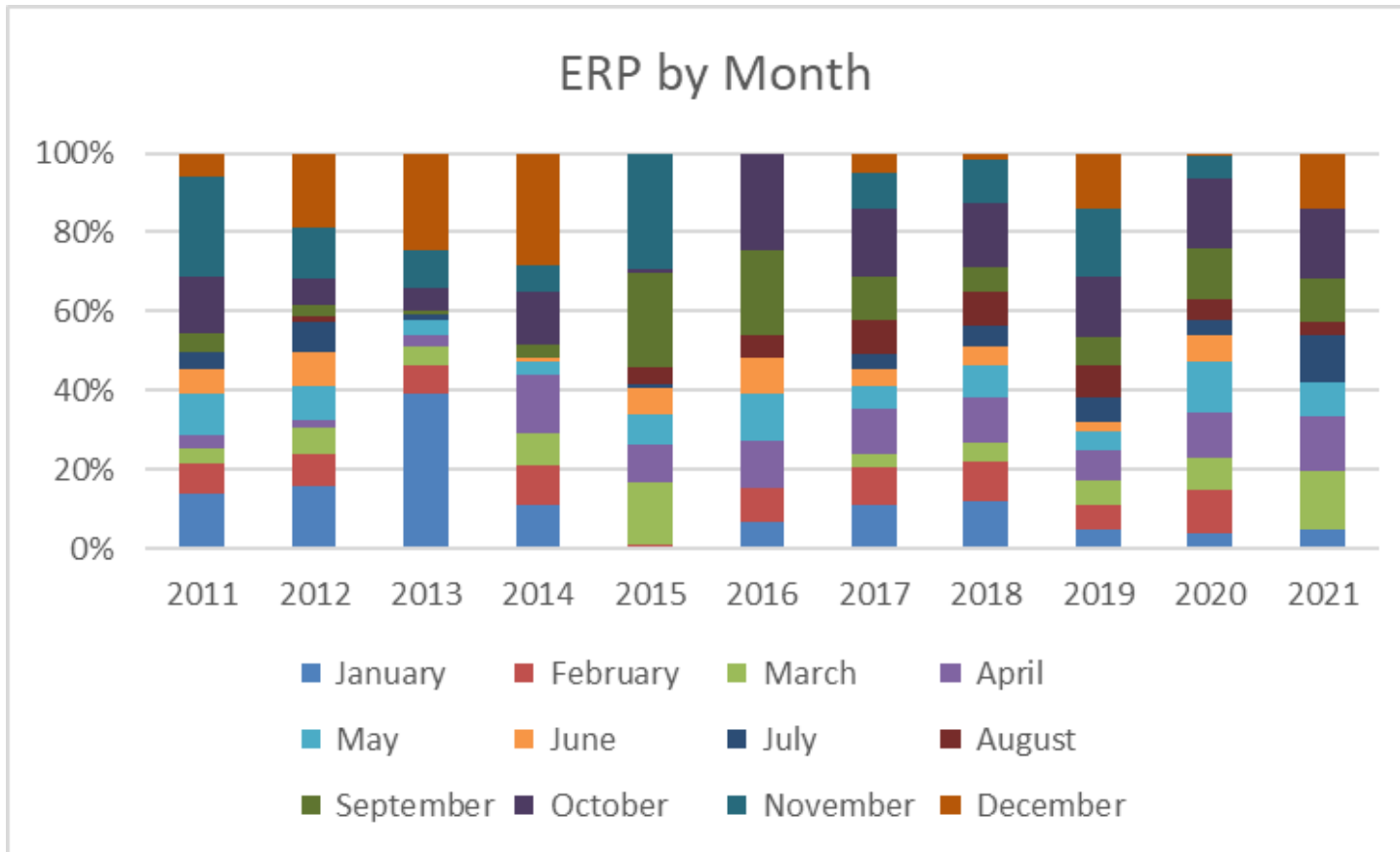


Current Statistics – CAP Costs

Current Statistics - LIURP

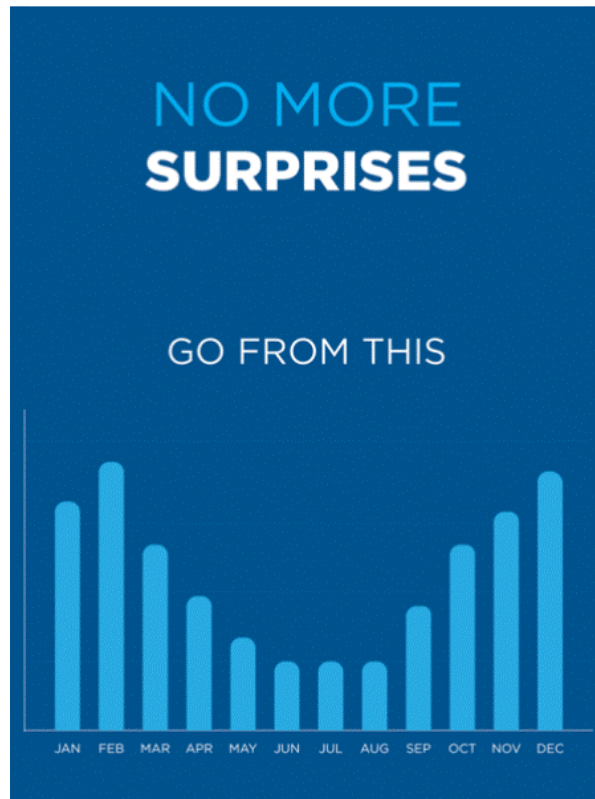
Monthly Spend



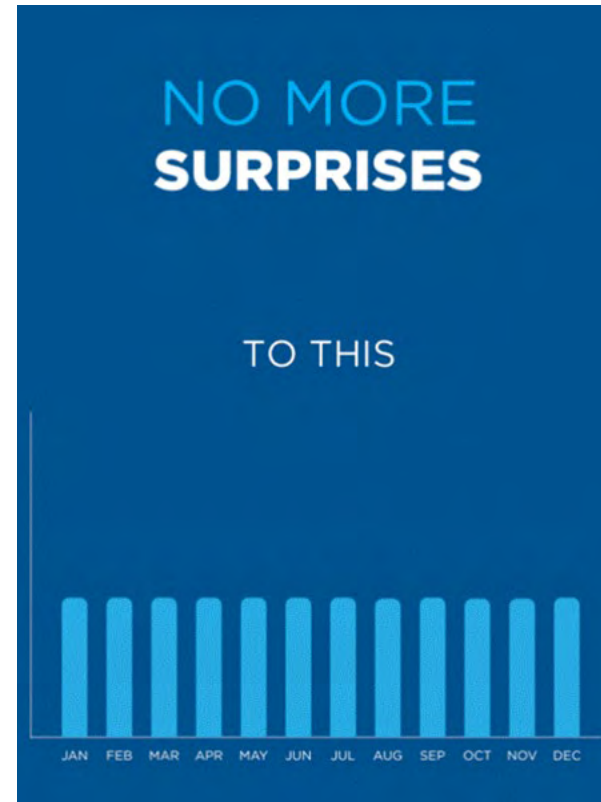


Current Statistics - ERP

12 Month Rolling Budget



It's a Great Time to Enroll in Budget Plan



Customers with a current account can enroll in the Budget Plan program at any time during the year. This program allows you to pay about the same amount each month.

You can keep paying the way you want - online, by check or by phone. **It's a great way to stay on track!**

Have you checked to see what your budget amount is?

That's right, you can sign [in to](#) your account today to see what your monthly bill would be if you enrolled.

[Check My Budget Amount](#)

Program Calculations:

- Past 12 months of usage at your residence or facility
- Normal seasonal weather conditions
- Current rates for service and delivery
- Current and projected cost of energy
- All Budget Plan accounts are reviewed multiple times a year and adjusted if necessary

CAP Semi-Annual Review

Results of April 2022 review:

# of Customers Reviewed	126
Refused LIURP	3
# of Customers requesting new income	32
LIHEAP grant pays entire bill	14
# reduced	76
Deceased	1

CAP Semi-Annual Review

Results of the 126 accounts reduced:

- Average Decrease = \$13 per month
- Total Monthly decrease = \$991
- Total annual increase to shortfall = \$11,892
- Total increase to shortfall since Oct, 2018= \$286,968

LIHEAP 2021-2022 as of 4/27/22

LIHEAP Cash benefits range from \$500 to \$1500 (increase of 150% to minimum and increase of 50% to maximum benefits)

LIHEAP Cash totals: \$9,119,566.55 (15,957) - Average: \$572

FY 2020-2021: \$4,028,193.71 (15,050) – Average: \$268

Comparison: 120% increase in funds (less than a 1% increase in participation)

LIHEAP Crisis benefits range from \$25 to \$1200 (increase of 50% to the maximum benefit)

LIHEAP Crisis totals: \$799,447.98 (1,689) - Average: \$473

FY 2020-2021: \$768,390.48 (1,794) – Average \$429

Comparison: less than 1% increase in funds (less than a 1% decrease in participation)



With a projection of \$55-57 M of remaining funds if the program closed on May 6th, DHS officially announced they would be extending the program for an additional 2 weeks. The program will now end on May 20, 2022. DHS also plans to issue supplements; however no further information has been provided on the topic.

Utility File Transfer

The Crisis Utility File Transfer program began February 1, 2022 and is expected to continue until the end of the program.

Customer Care Agents have been trained to identify eligible households and obtain permission to request Crisis funds. In addition, we implemented (2) UFT email campaigns.

Email campaigns:

Total emails sent: 511

Customer provided approval via email: 82

Customer provided approval via Call Center: 45

Success Rate: 25%

Customer contacted local CAO: 51

Total referrals submitted as of 4/25/22 is 302; totaling \$131,465.92

Are you in need of assistance?

Beginning February 1, 2022, the Pennsylvania Department of Human Services provided utility companies the ability to request crisis monies on behalf of its customers. You may be eligible for assistance toward your Columbia Gas account.

Program grants range from \$25 to \$1,200.

If you would like Columbia Gas to submit a request to obtain a grant on your behalf, please apply by Thursday, May 5, 2022 by clicking the blue "Yes, I am interested" button below.

Please be advised this is not a guaranteed payment. The Pennsylvania Department of Human Services (DHS) will make the final decision regarding eligibility.

If you prefer to speak directly with one of our specialized customer service agents, please feel free to contact our Universal Services Department at 1-800-537-7431.

[Yes, I'm interested](#)

Visit the Department of Human Services' [website](#) for detailed information on LIHEAP and other heating assistance programs.

Emergency Rental Assistance Program

ERAP is still available in most counties serviced by Columbia Gas to assistance renters with rental and utility assistance.

York and Allegheny County are no longer accepting **new** applications.

- York closed the program to new applications on December 22, 2021.
- Allegheny closed the program to new applications on March 21, 2022.



Rental Assistance Programs

The Commonwealth of Pennsylvania Emergency Rental Assistance Program (ERAP) was created to help renters dealing with financial challenges related to the COVID-19 pandemic. For eligible households, the program offers rental and utility assistance to help Pennsylvanians avoid eviction or loss of utility service.

[Apply Today](#)

Emergency Rental Assistance Program (ERAP)

County	Total Funds	Total Households
Adams	\$104,561.21	185
Allegheny	\$577,798.21	977
Armstrong	\$4,294.79	8
Beaver	\$24,887.89	62
Butler	\$13,582.63	17
Centre	\$45,896.48	95
Clarion	\$23,544.18	34
Fayette	\$128,856.19	201
Franklin	\$12,617.06	19
Greene	\$9,061.72	23
Indiana	\$1,054.62	2
Jefferson	\$2,295.57	3
Lawrence	\$235,273.36	307
McKean	\$28,880.83	36
Somerset	\$46,134.04	76
Venango	\$3,263.86	5
Warren	\$30,514.77	58
Washington	\$217,936.08	329
Westmoreland	\$69,550.26	100
York	\$979,697.83	1,248
Totals	\$2,559,701.58	3,785

Pennsylvania Homeowner Assistance Fund (PAHAF)

The Pennsylvania Homeowner Assistance Fund is a program similar to the Emergency Rental Assistance Program. It was created as a result of the American Rescue Plan of 2021 to assist homeowners with avoiding mortgage delinquency, default, foreclosure, and loss of utilities.

- Program **opened** February 1, 2022 and will remain open until the beginning of 2025 or when funds are depleted; whichever occurs first.
- **Benefit levels:**
 - Total assistance per household is capped at \$30,000 or 24 months of assistance; whichever limit is reached first.
 - Utility Assistance: \$3,000 or 24 months; whichever limit is reached first. Utilities bills covered by the program include electric, gas, and water.

Pennsylvania Homeowner Assistance Fund (PAHAF)

- **Eligibility requirements:**

- Homeowner owns and occupies the property as their primary residence
- Property is in Pennsylvania
- Homeowner has experienced a financial hardship after January 21, 2020 (including a hardship that began before January 21, 2020 and continued after that date).
- Household income is equal to or less than 150% area median income (AMI) or 100% of the area median income for the United States; whichever is greater.
- Homeowner cannot receive the same assistance for mortgage payment, mortgage reinstatement, property charges, and/or utility payments from another federal, state, local, nonprofit, or tribal source.

- **How to apply:**

- **Online:** <https://pahaf.org>
- **By phone** with a HAF agent at 1-888-987-2423 (M-F) from 8 a.m. to 8 p.m.

Outreach

ALEXA MAPSTONE

724.880.2995

AMAPSTONE@NISOURCE.COM

What have we been up to since October?

Type of Outreach	Amount
Trainings (Virtual & In – Person)	16
Community Events	16
Community Meetings	23
Information/Brochure Distributions	27
Total	82

Who have we been interacting with since October?

Target Audience	Outreach Events/Info Distribution
Veterans	3
Low-Income Individuals/Families (0%-50% and 51%-150%)	16
0 – 50% Communities	27
Seniors	11
Agencies who work with target audiences	52

Trainings:

Career-link
Westmoreland)

Private Industry Council (Fayette &

Senior Centers

United Way

Pit Genesis

Big Brothers Big Sisters of Laurel Region

Mothers Making More

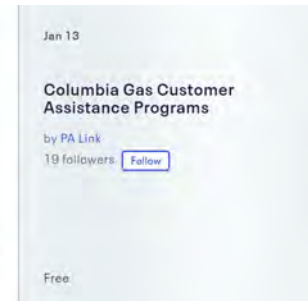
Early Interventions

Allegheny County Senior Presentation

FOR – McKees Rocks Community Outreach

PA Link

Be Utility Wise Virtual Conference





Community Events:

Trunk or Treats

Fayette County Human Service Wellness Conference

Beverly's Birthday's Baby Showers

Senior Expos

Veteran Expos

Family Fairs

Community Meetings:

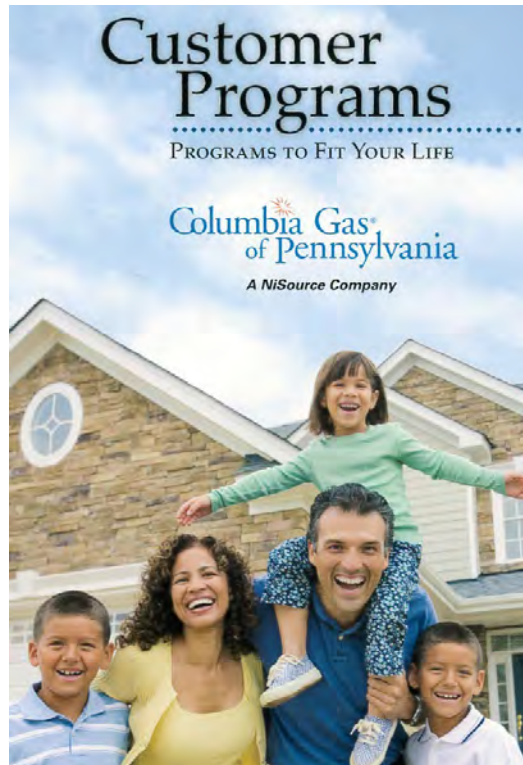
Washington
County Local
Housing Options
Team

Fayette County
Human Service
Council

Housing and
Homeless
Association Beaver

York County
Hispanic Coalition

Information/ Brochure Distributions

The image shows the cover of a brochure titled "WE'RE HERE FOR YOU". It features a photograph of a man talking on a phone while a young child sits on his lap. The Columbia Gas logo is at the bottom right. Below the photo, there is contact information: "FOR MORE INFORMATION Call us at 1-800-537-7431 Visit ColumbiaGasPA.com/Assistance Contact us on Facebook, Twitter or Nextdoor". A QR code is located on the right side of the brochure. At the bottom, there is a table listing various assistance programs.

FOR MORE INFORMATION
Call us at 1-800-537-7431
Visit ColumbiaGasPA.com/Assistance
Contact us on Facebook, Twitter or Nextdoor

Columbia Gas of Pennsylvania offers a variety of customer assistance programs. You can increase your home's energy efficiency, enroll in an affordable payment plan, or apply for assistance with overdue balances. To find out which programs fit your needs, SCAN THE QR CODE on this page to enter your information into the eligibility calculator or CALL US AT 1-800-537-7431.

ENERGY EFFICIENCY	AFFORDABLE PAYMENT PLANS	ASSISTANCE WITH OVERDUE BALANCES
<ul style="list-style-type: none">• WarmWise Low Income Usage Reduction Program• WarmWise Audits and Rebates• WarmWise Energy Efficiency Information	<ul style="list-style-type: none">• Customer Assistance Referral & Evaluation Services (CARES)• Customer Assistance Program (CAP)• Budget Payment Plan• Budget Plus	<ul style="list-style-type: none">• Low Income Home Energy Assistance Program (LIHEAP)• CRISIS Program• Emergency Rental Assistance Program (ERAP)• Dollar Energy Fund

Public Libraries

Children and Youth Services

Western Nurse Association

Cornerstone Beaver County

Counseling Agencies

Future Outreach:



Community Outreach Days (Targeting one service area per month)



Outreach to School Districts & Food Banks starting Fall 2022



Researching and Attending Community Events



Researching and Becoming Part of Community Councils / Groups



Any Ideas? I WOULD LOVE TO HEAR THEM!

amapstone@nisource.com

Media Campaigns

Results of LIHEAP Campaign

I. Google SEM (Pay-per-Click Ads)

Campaign Performance (November 2021 and February 2022)



Month	Impressions	Clicks	Click-thru Rate
November	23,885	3,978	16.65%
February	22,477	3,983	17.72%
TOTALS	46,362	7,961	17.19%



Analysis and Notes:

- Overall, the two-month LIHEAP campaign generated a significant amount of impressions, clicks, and direct conversions (i.e. calls) proving its ROI in such a short run period.
- While both months were fairly balanced in overall performance, November did see higher conversion rates. This behavior may suggest better resonance earlier in the season as opportunity to target audiences earlier
- Click-through rates consistently hovered around 16 - 17% each month and were well above most baseline industry averages of 1 - 2%. In addition, steady monthly clicks proved how the campaigns can be effective both before and after the holiday season.

Results of LIHEAP Campaign

II. Banner Ads

Campaign Performance (November 2021 and February 2022)

Month	Impressions	Clicks	Click-thru Rate
November	1,070,309	4,423	0.51%
February	1,083,373	5,067	0.47%
TOTALS	2,153,682	9,490	0.49%

Analysis and Notes:

- The campaign delivered more than 2.1 million banner ad impressions in both Spanish and English versions.
- For these types of ads, the average click-thru rate is 0.1%. Our average click-thru rate is .49%!
- In February, our ads saw more impressions and clicks than in November, despite it being a shorter month. Two versions of the ad are running – one set is to “Learn More” and drives to the webpage. The other is “Click to Call” and a phone number to talk to a Columbia representative appears.



III. Facebook Ads

Campaign Performance (November 2021 and February 2022)

Month	Ad	Impressions	Reach	Video Views	Clicks	Engagement
November	Dinner Table	61,977	24,954	18,325	918	62
	Squirrel	70,549	31,713	22,392	835	79
	Coffee Cup	65,577	23,537	18,550	905	71
February	Dinner Table	73,390	33,830	23,272	1,691	63
	Squirrel	114,156	43,871	31,664	1,179	92
	Coffee Cup	98,072	35,613	27,617	1,083	91
TOTALS		483,721	193,518	141,820	6,611	458

Results of LIHEAP Campaign

Analysis and Notes:

- Much like the other elements of the campaign, Facebook ads are also performed well.
- Video views and engagement with the ad is also high signaling that our targeting is on the mark. However there were some negative comments.
- Moving forward, Facebook should be considered again in future plans but creative may need to be refreshed.





Are you or someone you know having trouble paying energy bills?

We know there are times when paying energy bills may be difficult for you or someone in your life and we offer options to help our customers get back on track.

Please be aware, many programs have time restrictions and limited funding.

[Get Help Today](#)



Income-Eligible Programs

People who qualify for federal, state or local income-eligible payment assistance programs could receive help paying their bills.

[Find Programs](#)



Payment Plans

Our payment plans allow customers to spread past due balances across multiple months.

[Find a Plan](#)



Rental Assistance Programs

The Commonwealth of Pennsylvania Emergency Rental Assistance Program (ERAP) was created to help renters dealing with financial challenges related to the COVID-19 pandemic. For eligible households, the program offers rental and utility assistance to help Pennsylvanians avoid eviction or loss of utility service.

[Apply Today](#)



Energy Efficiency Programs

We make it easy to save energy and lower your energy bills with savings tips and income-eligible energy efficiency offerings.

[Start Saving](#)

Customer Email – General Assistance



Are you in need of assistance?

Beginning February 1, 2022, the Pennsylvania Department of Human Services provided utility companies the ability to request crisis monies on behalf of their customers. You may be eligible for assistance toward your Columbia Gas account.

Program grants range from \$25 to \$1,200.

If you would like Columbia Gas to submit a request to obtain a grant on your behalf, please apply by Thursday, May 5, 2022 by clicking the blue "Yes, I'm interested" button below. Please be advised this is not a guaranteed payment. The Pennsylvania Department of Human Services (DHS) will make the final decision regarding eligibility.

If you prefer to speak directly with one of our specialized customer service agents, please feel free to contact our Universal Services Department at 1-800-537-7431.

Yes, I'm interested

Customer E-Mail

CRISIS Utility File Transfer

Homeowner Assistance Fund E-Mail

Are you a homeowner and need assistance with your mortgage or utility costs?

The Pennsylvania Housing Finance Agency (PHFA) is currently accepting applications for the Pennsylvania Homeowner Assistance Fund (PAHAF).

Do not delay and apply today!

[See if You Qualify](#)

PAHAF is a program to assist eligible households with the following delinquent payments:

- Utility bills
- Mortgage reinstatements
- Future mortgage payments
- Various property charges associated with homeownership



Low Income Home Energy Assistance Program (LIHEAP) funding is still available through May 6. To learn more and apply, visit: www.columbiagaspa.com/energy-assistance-resource-center

Low Income Home Energy Assistance Program (LIHEAP) funding is still available through May 6. This federal program helps eligible households maintain utility service during the winter months.

To learn more and apply, visit:

www.columbiagaspa.com/energy-assistance-resource-center



LIHEAP Social Media Posts

SPRING ENERGY ASSISTANCE+ CAROUSEL



TAKE CONTROL OF YOUR BILL

You Have Options

In these difficult times, you may find yourself in a difficult financial situation – maybe for the first time. **Options are available for assistance, payment plans, efficiency and managing your usage.**

WHAT CAN I DO BUTTON



Bridges Pilot

Outcome of 2021 Rate Case

2 Components

- Media Buy/Outreach
- Case Management to increase program participation

Not to Exceed \$200,000

Media Outreach

Columbia Gas of PA - CUSTOMER ASSISTANCE 2022 Media Plan

		Mar.			Apr.			May			Jun.			Jul.			Aug.			Sept.			Oct.			Nov.			Dec.			GRP's	Reach	Freq.	Gross Imp./ Clicks							
		26	7	14	21	26	4	11	18	25	2	9	16	23	30	6	13	20	27	4	11	18	25	1	8	15	22	29	5	12	19					26	3	10	17	24	31	7
TELEVISION																															2,529.7			7,661,803								
Comcast - Pittsburgh Interconnect	TV/Cable																														531.2	83.0%	6.4	4,670,540								
KDKA-TV (CBS)																															70.7	35.2%	2.0	788,000								
WPCW-TV (CW)																															40.0	28.6%	1.4	319,000								
WPGH-TV (FOX)																															26.1	22.3%	1.2	216,300								
WPXI-TV (NBC)																															70.2	31.4%	2.2	630,048								
WTAE-TV (ABC)																															15.4	15.1%	1.0	192,600								
York, PA - Comcast Cable	Cable																														537.6	96.0%	5.6	520,427								
Gettysburg, PA - Comcast Cable	Cable																														428.4	95.2%	4.5	180,075								
State College, PA - Comcast Cable	Cable																														305.6	91.2%	3.4	89,109								
Bradford/Warren, PA - Spectrum Reach	Cable																														504.5	81.5%	9.5	55,704								
DIGITAL																																										
- Premium OTT/CTV																																		2,240,000								
Pittsburgh, PA	OTT/CTV																																1,000,000									
York, PA	OTT/CTV																																760,000									
Gettysburg, PA	OTT/CTV																																240,000									
State College, PA	OTT/CTV																																160,000									
Warren/Bradford, PA	OTT/CTV																																80,000									
- SEM	PPC																																13,600									
- Paid Social Media Ads	Facebook																																8,500									
Totals:																																2,529.7			9,923,903							

Bridges - Referral Component

- ❑ Hired Part Time Consultant
- ❑ Created List of customers with incomes less than 50% of poverty, not in CAP in arrears
- ❑ Outbound calls and follow up letters
- ❑ Ability to do CAP & Hardship Fund applications
- ❑ Ability to make additional referrals to available programs as necessary
- ❑ Will track referrals & outcomes

- ❖ Outcome from prior Advisory Council Meeting

Health & Safety Pilot Update

LIURP Health & Safety Pilot

- Successfully Completed 2 Health and Safety Pilot homes in 2021
- 16 customers identified for possible H&S measures.
 - 3 of the 16 have already been completed
 - 5 jobs are in active status awaiting or receiving measures.
- 11 of 12 insulation contractors across our service territory have H&S participants
- Most H&S customers require multiple estimates and site visits before the job is approved.

LIURP Health & Safety Pilot



- Most common repairs are roofing and knob & tube removal.
- Vermiculite insulation testing for asbestos. Last year 3 homes were tested and only one came back with a negative report. We were able to insulate that house. The report must indicate a zero percent asbestos content for us to proceed with insulation.

Health & Safety Customer

- Long term Senior resident on CAP and homeowner who wants to remain in the house.

- 2000 square foot house and built in 1933. No insulation in attic or walls.

- Gambrel slate roof with multiple leaks in different spots of the attic.

- 2-estimates requested.

- First -\$30,000 for complete removal and replacement.

- 2nd- \$7,400 for repair of broken/missing slate.

- Contractor flew a drone over the roof to evaluate.

- Approval was given for the repair and the benefit is the attic, walls and basement can be insulated.

- CAP since 2009.

- Budget = \$165, % of Budget CAP plan = \$82

- = \$1000 Shortfall per year

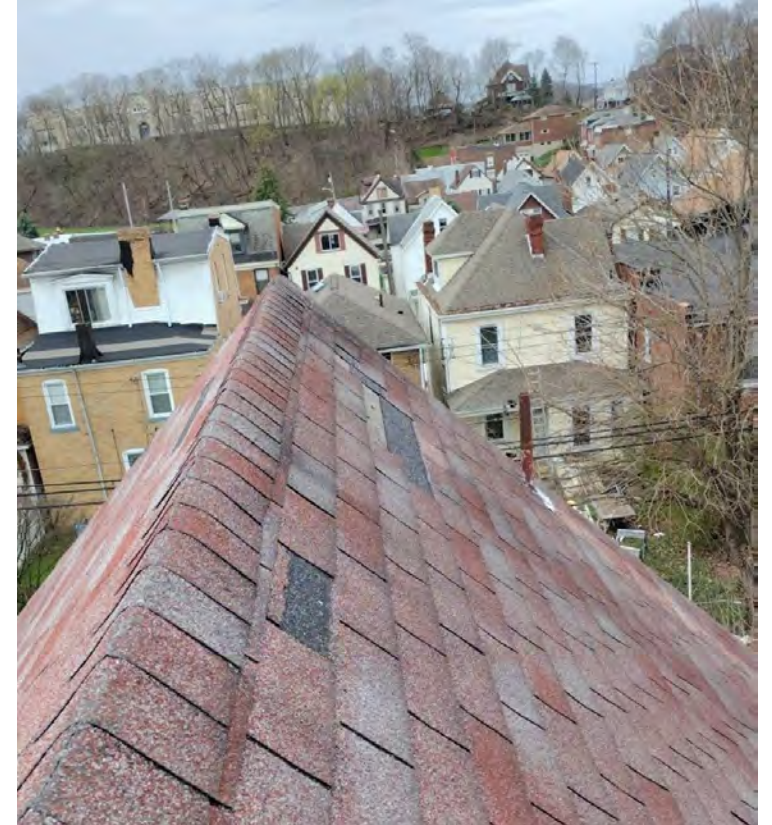


Health & Safety Customer

- Single parent, on Cap and a homeowner.
- 2273 square foot house and built in 1908. No insulation in attic.
- 30-year-old boiler was replaced with a Combi-Boiler
- What appeared to be a leak around the chimney flashing in the attic turned out to be a large patch of missing shingles on the peak of the roof.
- The Insulation crew was able to make the repair and complete the attic insulation.
- Cost for roof repair was \$900.00

CAP Since June 2021

Budget = \$202, Avg of Payment CAP Plan = \$75 = \$1,524 annual shortfall forgiveness



Health & Safety Customer



Health & Safety Customer

- Long term, senior homeowner on CAP who wants to remain in the house.
- 2004 square foot house built in 1852 No insulation in attic and has K&T wiring.
- New 95% energy efficient furnace installed.
- New direct vent hot water tank installed.
- The customer was deferred in our program twice before and once from the State weatherization program due to roof leak.
- First bid for roof -\$13,800. I was able to negotiated to \$12,600
- Complete tear off and re-roof of 3 separate roofs.
- Bid to eliminate K&T in the attic was \$1000.00
- House can now be insulated and air sealed.

CAP Since January 2021

Budget = \$371, Pays Avg payments - \$99

Annual Shortfall is \$3,264

Material Cost Increases

Product	2020	2022
Forced Air furnace 75,000 BTU 95% Efficient	\$ 3,795	\$4,500
Hot Water Boiler 80% Efficient	\$ 4,500	\$5,950
Hot Water Boiler 95% Efficient	\$ 6,795	\$8,000
Hot Water Tank-Direct Vent	\$ 1,800	\$3,100
Insulation per SQ FT		up \$.30
Replacing Exterior Door		up \$180
Caulking		up 18%
Sidewall Insulation		up 26%

- The largest increases have been in the HVAC field.
- We experienced price increases multiple times throughout the year.
- Some heating systems such as boilers became hard to find.

Focus for 2022

- ❖ LIURP Production and Health & Safety Pilot
- ❖ Bridges Program Implementation
- ❖ Outreach
- ❖ Next USECP due April 1, 2023

- ❖ Next Meeting Date – Thursday, October 20, 2022

Round Table



Thank you!

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031211
	:	
Columbia Gas of Pennsylvania, Inc.	:	

REBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

July 6, 2022

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PREPARED DIRECT TESTIMONY OF HARRY GELLER

Q. Please state your name, occupation, and business address.

A. My name is Harry S. Geller. I am an attorney. I am retired as the Executive Director of the Pennsylvania Utility Law Project (PULP), but have maintained an office at 118 Locust St., Harrisburg, PA 17101 for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q: Did you previously submit testimony in this proceeding?

A: Yes. I submitted direct testimony pre-marked as CAUSE-PA Statement 1 on behalf of the Coalition for Affordability Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q: What is the purpose of your rebuttal testimony?

A: My rebuttal testimony responds to the direct testimony of Anthony Cusati, III, witness for The Retail Energy Supply Association, Shipley Choice, LLC, and NRG Energy, Inc. (collectively RESA/NGS).¹ Specifically, I will respond to Mr. Cusati’s recommendation that Columbia should institute Bill Ready Billing.² I am opposed to this recommendation. Bill Ready Billing obfuscates supplier charges, making it difficult to distinguish between basic and non-basic service charges. This creates the distinct risk that residential shopping customers could face termination for non-payment of non-basic charges .

Q: Please summarize the testimony to which you wish to respond.

A: In his Direct testimony, Mr. Cusati asserts that Columbia’s current Rate Ready billing system is not reasonable because there is a limited number of rate codes available to Natural Gas

¹ RESA/NGS St. 1.
² Id. at 5.

1 Suppliers (NGS). He asserts that, since each rate code is associated with a unique rate, when a
2 supplier reaches the maximum number of rate codes allotted to them, the supplier has no ability to
3 consummate additional contracts.³ He asserts that this limitation impedes an NGS's ability to make
4 timely and competitive offers to customers and to develop competitive offers to newly acquired
5 customers.⁴ He indicates that Columbia could remedy this problem by increasing the number of
6 available rate codes, but recommends that Bill Ready Billing (where NGSs are provided meter
7 usage data for each customer and then calculate the customer's bill on their own system) is a better
8 alternative.⁵

9 **Q: What is your response to Mr. Cusati's recommendation that Columbia adopt Bill**
10 **Ready Billing?**

11 A: I oppose this recommendation. Bill Ready Billing obfuscates supplier charges and makes
12 it more difficult for the customer and the utility to determine for what the customer is being
13 charged. Specifically, I am concerned that suppliers will place non-basic service charges on the
14 customer's utility bill and that Columbia will not be able to determine whether a suppliers' bill
15 ready billing charges include these types of charges. This also makes it difficult for a shopping
16 customer to make an apples-to-apples rate comparison to ensure they are getting the best rate.

17 The assessment of non-basic charges, without clear delineation, could lead to illegal
18 terminations of low income households. Pursuant to section 56.83(3) of the Commission's
19 regulations, Columbia is prohibited from terminating service to a residential consumer for
20 nonpayment of non-basic service charges.⁶ If Columbia cannot decipher whether a supplier has

³ Id. at 2-3.

⁴ Id.

⁵ Id. at 5

⁶ 52 Pa. Code 56.83(3).

1 included non-basic service charges in the bill ready billing charges, then it would be prohibited
2 from proceeding with terminating service to a residential consumer.

3 As I explained in my direct testimony, Columbia's low income customers already have a
4 disproportionately high rate of termination compared to average residential customers.⁷ Loss of
5 natural gas service has a deep and lasting impact on the health and wellbeing of the entire
6 household and the community as a whole and is a common catalyst to homelessness and to fires
7 due to unsafe alternative heating sources.⁸ The proposal to adopt Bill Ready Billing increases the
8 chances that low income customers will suffer illegal service terminations due to the potential that
9 non-basic charges will be assessed to their bill. Thus, I oppose the recommendation that Columbia
10 adopt bill ready billing.

11 **Q: Does this conclude your rebuttal testimony?**

12 A: Yes.

⁷ CAUSE-PA St. 1 at 15-17.

⁸ Id.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031211
	:	
Columbia Gas of Pennsylvania, Inc.	:	

SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)**

July 26, 2022

1 **PREPARED SURREBUTTAL TESTIMONY OF HARRY GELLER**

2 **Q: Please state your name, occupation, and business address.**

3 A. My name is Harry S. Geller. I am an attorney. I am retired as the Executive Director of the
4 Pennsylvania Utility Law Project (PULP), but have maintained an office at 118 Locust St.,
5 Harrisburg, PA 17101 for the purpose of providing consulting services and assistance to low
6 income individuals and the organizations which represent them in utility and energy matters.

7 **Q: Did you previously submit testimony in this proceeding?**

8 A: Yes. I submitted direct testimony and rebuttal testimony on behalf of the Coalition for
9 Affordability Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) pre-marked
10 as CAUSE-PA Statement 1 and CAUSE-PA Statement 1-R, respectively.

11 **Q: What is the purpose of your surrebuttal testimony?**

12 A: My surrebuttal testimony responds to the rebuttal testimony of Columbia Gas Inc.
13 (Columbia, Company, or CPA) witnesses Mark Kempic,¹ Deborah Davis,² Kevin Johnson,³ and
14 Theodore Love.⁴ I will also address the rebuttal testimony of Bureau of Investigation and
15 Enforcement (I&E) witness D.C. Patel.⁵

16 My surrebuttal testimony is not intended to address every issue raised or otherwise
17 discussed by these or other witnesses in rebuttal. Absence of response to any specific
18 recommendation or position of any witness does not indicate my agreement. Unless required for
19 context in providing a further response to rebuttal testimony, I will not reiterate the extensive
20 arguments and evidence that I provided in my direct and rebuttal testimony. To the extent an

¹ CPA St. 1-R.

² CPA St. 13-R.

³ CPA St. 6-R.

⁴ CPA St. 16-R.

⁵ I&E St. 1-R.

1 argument raised by any party in rebuttal was already sufficiently addressed in my direct testimony,
2 I do not intend to respond, and stand firmly on the evaluation, analysis, and recommendations
3 contained in my direct testimony.

4 **Q: How is your testimony organized?**

5 A: My surrebuttal testimony is divided into five sections. In section I, I will begin by
6 responding to Columbia witness Davis and I&E witness Patel regarding my recommendations
7 about Columbia's Low Income Usage Reduction Program (LIURP). In section II, I will respond
8 to Columbia witness Davis regarding my recommendations about Columbia's Customer
9 Assistance Program (CAP). In section III, I will respond to Columbia witness Davis regarding my
10 recommendations that the Company adopt certain performance metrics to eliminate identified
11 disparities in the quality of service to low income customers. In section IV, I will respond to
12 Columbia witness Johnson regarding my recommendation that Columbia's proposed increase to
13 the fixed residential customer charge and Revenue Normalization Adjustment both be rejected.
14 Finally, I will respond to Columbia witness Love regarding my recommendations about the
15 Company's proposed Energy Efficiency and Conservation (EE&C) Program.

16 **I. LOW INCOME USAGE REDUCTION PROGRAM (LIURP)**

17 **Q: Please summarize the recommendations you made in your direct testimony regarding**
18 **Columbias LIURP.**

19 A: In my direct testimony, I explained that Columbia's LIURP is a critical universal service
20 program designed to improve bill affordability, reduce arrearages and termination rates over the
21 long term, and that Columbia's LIURP program can help mitigate the impact of the proposed rate
22 increase on low income high-use households by installing a range of efficiency and weatherization

1 measures to reduce unnecessarily high usage.⁶ I also explained that the program is not funded in
2 a manner to meet the true need for energy efficiency and weatherization services.⁷ I recommended
3 that, at a minimum, Columbia should be required to increase its overall LIURP budget by a
4 percentage equal to the percentage increase of any approved residential rate increase.⁸ I explained
5 that this recommendation would help alleviate the disparate burden of Columbia's proposed rate
6 increase on low income households who, without assistance, are unable to meaningfully reduce
7 energy usage to mitigate the harsh consequences of a rate increase.

8 **Q: Please summarize the testimony regarding your LIURP recommendation to which**
9 **you wish to respond.**

10 A: Columbia witness Davis argues that Columbia's LIURP budget is already high compared
11 to other Natural Gas Distribution Companies (NGDCs) and she expresses concern about the
12 amount that Columbia's non-CAP customers pay toward LIURP.⁹ She also argues that some
13 LIURP jobs are not completed due to a lack of cooperation from the customer.¹⁰ She asserts that
14 there is a weatherization workforce shortage that is largely due to a lack of trained weatherization
15 auditors and crews, and not insufficient LIURP funding.¹¹ I&E witness Patel argues that it is
16 inappropriate to increase the LIURP budget in this proceeding because the Company has unspent
17 funds from prior years and has not shown that it will exhaust the existing budget.¹² He argues that
18 I did not provide any support for how the proposed incremental spending component would be

⁶ CAUSE-PA St. 1 at 25-27.

⁷ Id.

⁸ Id. at 27

⁹ CPA St. 13-R at 3.

¹⁰ Id. at 4

¹¹ Id. at 5-6.

¹² I&E St. 1-R at 3.

1 exhausted.¹³ He also argues that Columbia’s LIURP budget should not be increased outside of its
2 upcoming Universal Service and Energy Conservation Plan (USECP) proceeding.¹⁴

3 **Q: What is your response to Ms. Davis’s concerns about the cost of LIURP to ratepayers**
4 **and Mr. Patel’s argument that LIURP funding should not be increased – irrespective of**
5 **demonstrated need – because Columbia has unspent budget and rollover?**

6 A: The need identified by Columbia in its LIURP needs assessment is real and continues to
7 exist. The need of low income customers for usage reduction will only grow even more pronounced
8 if Columbia’s requested rate increase is approved.¹⁵ Appropriate funding must be available to serve
9 that need.

10 I note that the rollover in Columbia’s LIURP budget is due to the slowdown in work due
11 to the widespread business closures and worker unavailability during the early phases of the
12 COVID-19 pandemic.¹⁶ While the COVID-19 pandemic still presents public health and economic
13 challenges, there is indication that the public is now more open to interaction. Indeed, Ms. Davis
14 indicates that Columbia saw improved customer engagement in the fourth quarter and early 2022.¹⁷
15 There can be little doubt that the increased cost of energy affecting everyone’s budget will further
16 accelerate that engagement. I explained in my direct testimony, inflation has increased the cost of
17 standard LIURP measures and, in turn, increased the cost of providing comprehensive energy
18 reduction services.¹⁸ In other words, due to record inflation in the cost of LIURP measures,
19 Columbia must necessarily spend its LIURP budget at a higher rate just to keep pace with existing
20 levels of services. If approved, the rate increase Columbia proposes, in conjunction with the other

¹³ Id. at 8.

¹⁴ Id. at 8-9.

¹⁵ See CAUSE-PA St. 1 at 25-29; see also WPTF St. 1 at 6-7.

¹⁶ CPA St. 13 at 11-12.

¹⁷ Id. at 12.

¹⁸ CAUSE-PA St. 1 at 26.

1 effects of inflation on low income customers, will drive greater need for comprehensive usage
2 reduction services. Without an increase in LIURP funding now in conjunction with any potential
3 rate increase, the needs of Columbia's most vulnerable households to redress identified rate
4 unaffordability will not be met.

5 Ms. Davis's concerns about the cost of LIURP being paid by other ratepayers fails to
6 acknowledge two key facts. First, Columbia files an annual reconciliation which adjusts its
7 universal service rider for any over/under spending based on actual spend.¹⁹ Thus, ratepayers are
8 not required to pay for the LIURP funds if they are not spent. Second, as explained by Office of
9 Consumer Advocate witness Roger Colton, LIURP investments generate universal service costs
10 reductions – helping to reduce overall universal service costs shouldered by other ratepayers over
11 the long term.²⁰ According to Columbia's most recent independent third-party universal service
12 program evaluator, Columbia's LIURP generates between 21-24% in consumption savings.²¹
13 Columbia focuses its LIURP services specifically on high usage CAP customers. Historically, over
14 70% of those served through LIURP are CAP high usage customers, whose annual CAP credits
15 exceed \$1,000.²² Saving these high usage, high CAP credit households between 21-24% in
16 consumption savings each year can substantially reduce CAP costs over the long term – resulting
17 in appreciable savings for all residential consumers.

¹⁹ CAUSE-PA to CPA III-13.

²⁰ OCA St. 4 at 44-46.

²¹ Columbia Gas of Pennsylvania, Inc. 2017 Impact Evaluation of its Universal Service and Energy Conservation Programs Submitted in Compliance with 52 Pa. Code § 62.4, at 51 (Sept. 2017), https://www.puc.pa.gov/general/pdf/USP_Evaluation-Columbia.pdf.

²² *Id.* at 56.

1 **Q: What is your response to Ms. Davis’s argument that LIURP jobs are not completed**
2 **due to lack of cooperation by the customer?**

3 A: Ms. Davis indicates that the default rate for LIURP jobs (i.e. the rate that contractors cancel
4 the job) is approximately 40%.²³ She asserts that that many LIURP jobs are not completed due to
5 a lack of cooperation by the customer and that many customers are “still very reluctant to be
6 weatherized.”²⁴ However, in response to discovery, Columbia indicates that structural issues, and
7 lack of response from the customer are the leading causes of LIURP defaults, not customer
8 refusal.²⁵ In 2019, out of 373 total defaults, 139 defaults (37%) were for structural issues, 181
9 defaults (49%) were due to lack of response from the customer, and only 33 defaults (9%) were
10 actually due to customer refusal.

11 There are several reasons why a customer may not respond to LIURP related
12 communications, and a lack of response does not mean that the customer is reluctant to be
13 weatherized. Some consumers do not understand the benefits of the program, the nature of the
14 services provided, or the fact that participation is free. Given the proliferation of energy-related
15 scams, it is reasonable for a consumer to not respond to a LIURP contractor. Even if the consumer
16 understands the program, they may not have the time or resources to participate. The lives of
17 people living in poverty can be hectic, juggling multiple low-wage hourly jobs, childcare, medical
18 appointments, and other emergent needs – often without stable transportation or other resources
19 that make those life tasks easier for higher income households. These constant stressors can make
20 it difficult to adhere to a schedule – especially when services are provided during normal business
21 hours. Importantly, many low income consumers cannot afford access to stable telecommunication

²³ CPA St. 13-R at 4.

²⁴ Id.

²⁵ CAUSE-PA to CPA IV-14.

1 services, which can make it incredibly difficult to respond to the Company’s communications.
2 The Federal Communications Commission views 2% of income as the affordability threshold for
3 phone service; however, the Census Bureau’s Consumer Expenditure Survey (CES) indicates
4 households with income below \$15,000 pay approximately 3.3% of their income for
5 telecommunication services. For households in deep poverty (at or below 50% FPL), phone service
6 can cost as much as 15% of income.²⁶ Thus, many households in poverty are likely to struggle to
7 stay connected.

8 Rather than attribute LIURP defaults to “lack of cooperation” from low income consumers,
9 it is critical that Columbia work with low income consumers to identify the reasons they are unable
10 to respond to communications – and to make programmatic reforms to better meet the unique
11 needs of the population it seeks to serve. As an initial step, Columbia should improve efforts to
12 follow up with customers who miss their appointments, regardless of the reason, and should work
13 to address and remove any barriers which are constraining the ability of the household to
14 participate.

15 **Q: What is your response to Ms. Davis’s assertion that LIURP jobs are not being**
16 **completed due to a worker shortage?**

17 A: If Columbia’s LIURP contractors are unable to adequately serve the need for usage
18 reduction programming, then the Company should take affirmative steps to help its LIURP
19 contractors to recruit, train, and retain qualified workers. This is not an argument against increased
20 LIURP funding – it is an argument in support of increased resources to support workforce
21 development. To that end, I recommend that Columbia be permitted to devote up to \$100,000 – or
22 2% of its annual LIURP budget – to assist in weatherization and energy efficiency workforce

²⁶ John B. Horrigan, PhD, Reimagining Lifeline: Universal Service, Affordability, and Connectivity, Benton Institute for Broadband & Society, at 19-20 (Feb. 2022).

1 development efforts. The Company should be required to work collaboratively with its Universal
2 Service Advisory Committee to establish a workforce development and recruiting strategy to
3 expand the capacity of its existing LIURP contractors.

4 **Q: How do you respond to Mr. Patel’s argument that Columbia’s LIURP budget should**
5 **not be evaluated outside of its USECP proceeding?**

6 A: I disagree. It is both appropriate and relevant for a utility and the Commission to examine
7 the Company’s LIURP budget – along with other universal service program reforms – in the
8 context of evaluating a proposed rate increase.

9 As I’ve explained, universal service programming must be appropriately funded to ensure
10 that low income households can reasonably afford to maintain service to their home.²⁷ Columbia
11 is proposing to substantially increase residential rates through this proceeding, without putting
12 forward any proposal to offset the impact of the rate increase on low income customers. If
13 approved, the proposed rate increase will exacerbate existing levels of unaffordability for
14 Columbia’s low income, high usage customers, causing additional need for LIURP services to help
15 mitigate the bill impacts and prevent additional arrearages and terminations. It is common for
16 universal service program funding (including for LIURP) to be adjusted in a rate case to help lessen
17 the financial impact on low income, high usage customers and help prevent increased arrearages
18 and terminations associated with a residential bill increase.

19 Columbia’s low income customers already face disproportionately high rates of payment
20 trouble and involuntary termination simply because they cannot afford to pay. A rate increase will
21 only make this disparity worse – quite literally pricing more low income families beyond the ability
22 of their inelastic budget to afford home heat, cooking, and hot water. If the Commission approves

²⁷ 66 Pa. C.S. §2203(8).

1 any rate increase in this proceeding, an adjustment to Columbia’s LIURP budget will be needed
2 in conjunction with that increase to help mitigate the substantial financial impact on its most
3 vulnerable customers.

4 **II. CUSTOMER ASSISTANCE PROGRAM (CAP)**

5 **Q: What were your recommendations regarding Columbia’s CAP program?**

6 A: In my direct testimony, I explained that it is critical to examine whether low income
7 customers will be impacted by an intervening rate increase, and, if so, to make the necessary
8 changes to a utility’s universal service programming, rules, and policies in order to remediate that
9 impact.²⁸ I further explained that low income customers have disproportionate energy burdens,
10 even with CAP, and that the income for these families falls far short of the income level needed to
11 be self-sufficient and live without financial assistance. Any increase in rates will result in
12 increased unaffordability.²⁹ I also explained that CAP only reaches approximately 35% of
13 Columbia’s confirmed low income customers – and just 26% of Columbia’s estimated low income
14 customers, and I noted that Columbia’s CAP participation rate has shown no measurable
15 improvement in the last decade – even though it has raised rates significantly over this time.³⁰

16 I recommended that Columbia adopt a standardized income screening process, lower its
17 CAP energy burdens to comply with the Commission’s CAP Policy Statement, and establish
18 benchmarking goals for CAP enrollment.³¹ I also recommended that Columbia permanently
19 maintain its expanded policy of accepting income documentation for CAP enrollment that it began
20 accepting during the COVID-19 pandemic.³² Finally, I recommended that Columbia begin

²⁸ CAUSE-PA St. 1 at 18.

²⁹ Id. at 10-13.

³⁰ Id. at 20-21.

³¹ Id. at 21-24.

³² Id. at 22.

1 conducting monthly evaluation of CAP customer bills to ensure that customers are receiving the
2 most advantageous CAP rate and should change the CAP payment plan for any customer who is
3 not receiving the most advantageous rate.³³

4 **Q: Please summarize Columbia Witness Davis' Rebuttal Testimony regarding your CAP**
5 **recommendation to which you respond.**

6 A: Columbia witness Davis disagrees that Columbia should be required to take steps to
7 increase enrollment in CAP.³⁴ She argues that every customer that is confirmed low income has
8 either participated in or been referred to Columbia's low income programs.³⁵ She argues that
9 asking all new and moving customers about income status would be too time consuming and
10 expensive and asserts that customers may be offended by the inquiry.³⁶

11 Regarding my recommendation that Columbia adjust its energy burden standards to align
12 with the Commission's CAP Policy statement, Ms. Davis argues that Columbia's CAP rates are
13 already affordable.³⁷ She argues that the issue should be addressed in the Company's next USECP
14 so that other factors can be considered.³⁸ She asserts that, in setting CAP energy burdens, the
15 Commission should consider the fact that LIHEAP could further reduce the required CAP
16 payment.³⁹ Ms. Davis also disagrees with my recommendation that Columbia institute a monthly
17 CAP bill review process to ensure that customers get the best rate.⁴⁰

³³ Id. at 25.

³⁴ CPA St. 13-R at 21-22.

³⁵ Id. at 20.

³⁶ Id. at 23.

³⁷ Id. at 23.

³⁸ Id. at 26-27.

³⁹ Id. at 27.

⁴⁰ Id. at 29-30.

1 **Q: What is your response to Ms. Davis's disagreement with your recommendation that**
2 **Columbia improve its CAP enrollment?**

3 A: I stand by my recommendations. Ms. Davis argues that all confirmed low income
4 customers have either been enrolled in or referred to a low income program – suggesting that there
5 is no need to improve outreach because all low income households presumably already know about
6 CAP and would enroll in the program if they so choose.⁴¹ But the majority (65%) of Columbia's
7 confirmed low income customers are not enrolled in CAP, and will experience the full, unmitigated
8 impact of the proposed rate increase.⁴² Moreover, as I explained in direct testimony, reliance on
9 confirmed low income counts is fundamentally flawed, as it includes only a small segment of the
10 actual low income population – namely, those who have already been identified by the Company.⁴³
11 Finally, the determination of who is a qualifying low income household is not a once and done
12 process that is based on a static group of people since household incomes and composition, among
13 other factors, are subject to change.

14 At its core, Ms. Davis' testimony is premised on the assumption that all low income
15 customers, even those who are new customers, recently encountering financial hardship, or
16 experienced a recent change in household composition are known by the Company, know about
17 CAP and will apply if they need help. Therefore, Ms. Davis argues further outreach is not
18 warranted. This is an over-simplification of the issue and fails to recognize that many customers
19 do not understand the distinctions regarding eligibility, benefits, or enrolment methods among the
20 various assistance programs, let alone specifically what CAP is and what it can provide to
21 households that enroll. I have spent over 30 years representing low income utility consumers. In

⁴¹ Id. at 20-21.

⁴² CAUSE-PA St. 1 at 20.

⁴³ Id. at 7.

1 my experience, it is exceedingly rare for a low income consumer to turn down enrollment in CAP
2 or other assistance program if they understand the benefits and do not face insurmountable barriers
3 to enroll. While there certainly are some who knowingly turn down assistance, it is wholly
4 unreasonable to conclude that a full 65% of households have been informed about CAP,
5 understand the benefits, and consciously decide to not apply.

6 In my experience, there are many reasons a household may not apply for CAP after being
7 informed of the program. Low income households regularly confuse CAP with LIHEAP or other
8 programs, so they do not complete the CAP application process – thinking they have already
9 enrolled. Others may have been denied in the past or defaulted from the program and do not realize
10 that a change of income, submission of documentation, the addition of a household member, or
11 lapse of time may now make them eligible.

12 Importantly, some low income customers may be choosing not to enroll in CAP – or may
13 voluntarily withdraw from the program – because they do not perceive Columbia’s CAP rates to
14 be affordable, an issue that Columbia could address by following my recommendation that the
15 Company adhere to the maximum CAP energy burdens in the Commission’s CAP policy statement
16 and more frequently assessing whether a CAP customer is receiving the most advantageous rate.⁴⁴
17 Columbia’s CAP rates are sometimes much higher than actual usage – especially in warmer
18 weather when consumers use less natural gas. Therefore, it is vitally important for Columbia to
19 more frequently adjust CAP rates to ensure CAP participants are receiving the most advantageous
20 rate.

21 I continue to assert that Columbia’s CAP enrollment is too low, that this low enrollment
22 rate is exacerbating disparities in payment trouble and termination of low income families, and

⁴⁴ See Id. at 22-23.

1 that Columbia must improve its education and outreach to identify income eligible customers and
2 ensure those customers know about the benefits of the program and are encouraged and supported
3 to apply.

4 **Q: What is your response regarding Ms. Davis’s assertion that inquiring about the**
5 **income status of new and moving customers would be time consuming and expensive?**

6 A: I disagree that it would be time consuming or expensive to ask about the income status of
7 new and moving customers during these calls. It would only take a few seconds to ask whether the
8 customer would like to share their income information to potentially qualify for lower rates and,
9 if the customer answers yes, to refer them to the CARES team to screen for eligibility for the
10 Company’s universal service programs. The bulk of the time taken for the income screening would
11 take place after referral to the CARES team, where actual income information could be collected.
12 The benefits of proactively identifying low income customers and screening them for universal
13 service program eligibility before they run into payment trouble far outweigh the few seconds it
14 takes to ask new or moving customers whether they would like to provide income information.
15 Just asking the question would not be difficult or time consuming – nor would it be out of the
16 ordinary. Credit card companies and banking institutions, for example, routinely inquire about
17 income status as a matter of course.

18 I also disagree with Ms. Davis’s assertion that the possibility that some customers may be
19 “offended or annoyed” by a question about their income status is a reason not to ask.⁴⁵ If informed
20 of the reason for the question, customers will understand and appreciate why they are being asked,
21 and far more will respond and benefit than those who Ms. Davis speculates may be offended. I
22 reiterate that providing income information by all households should not be mandatory. Customers

⁴⁵ CPA St. 13-R at 21.

1 should merely have the informed option of whether to provide income information to see whether
2 they are qualified for better rates through CAP or are eligible for other available programs.

3 **Q: You noted above that Ms. Davis believes Columbia’s CAP rates are already**
4 **affordable and opposes your recommendation that Columbia reduce its CAP energy burden**
5 **standards to align with the Commission’s CAP Policy Statement. How do you respond?**

6 A: I disagree with Ms. Davis’s assertion that Columbia’s CAP rates are already affordable.⁴⁶
7 The Commission has set affordability standards in its Final CAP Policy statement, based on a
8 years-long inquiry into energy affordability, and Columbia’s rates exceed those guidelines.⁴⁷ Ms.
9 Davis asserts that Columbia has the “lowest CAP payment plan of all gas utilities in
10 Pennsylvania,”⁴⁸ however, the data she cites is from the 2020 Universal Service Report, which
11 was based on 2019 data. That data is now outdated. Since 2019, every other NGDC in
12 Pennsylvania has filed for and received Commission approval to implement the reduced maximum
13 CAP energy burden standards established in the Commission’s formal CAP Policy statement.⁴⁹ In
14 reality, Columbia has fallen behind industry standards and is on track to have the most expensive
15 CAP rates among all Pennsylvania NGDCs.

16 Ms. Davis argues that the fact that the Company terminated just over 1,000 CAP customers
17 and had a 4% CAP termination rate in 2019 demonstrates the affordability of Columbia’s current

⁴⁶ CPA St. 13-R at 24.

⁴⁷ 52 Pa. Code § 69.265(2)(i)(B); see also Final CAP Policy Statement and Order, M-2019-3012599 (Sept. 2019).

⁴⁸ St. 13-R at 15.

⁴⁹ Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024, M-2018-3003177, Final Order (Entered May 12, 2022); PECO Energy Company Universal Service and Energy Conservation Plan for 2019-2024 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4., M-2018-3005795, Final Order (Entered June 16, 2022); UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc. – Electric Division Universal Service and Energy Conservation Plan for 2020-2025, M-2019-3014966, Final Order (Entered June 16, 2022); National Fuel Gas Distribution Corporation’s Universal Service and Energy Conservation Plan for 2022-2026 Submitted in Compliance with 52 Pa. Code § 62.4, M-2021-3024935, Final Order (Entered May 3, 2022); Addendum to Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022, M-2016-2542415, Final Order (Entered Mar. 26, 2020).

1 CAP program.⁵⁰ However, in that same year, Columbia terminated 10,770 residential customers
2 (including low income customers), and its general residential termination rate was 2.7%.⁵¹ In
3 2019, Columbia's CAP termination rate was 48% higher than its residential termination rate in
4 2019, and CAP customers accounted for nearly 10% of Columbia's residential terminations but
5 only 5.7% of its residential customers.⁵² Ultimately, the fact remains: Columbia's CAP customers
6 are terminated at a disproportionate rate relative to its general residential customer base. Such a
7 disparity is indicative of rate unaffordability.

8 Unfortunately, these compelling Columbia specific disproportionately high payment
9 trouble and termination rates are not the only indicators of rate unaffordability. As I explained in
10 my direct testimony, citing data from the 2020 Residential Energy Consumption Survey, low
11 income customers often forego other critical necessities like food and medicine and/or keep their
12 home at unsafe or unhealthy temperatures to afford their home energy costs.⁵³ This is especially
13 true across communities of color.

14 Ms. Davis seems to accept the fact that low income households are, because of their
15 poverty, terminated at rates higher than the general residential customers. This conception of
16 inevitability, and her apparent acceptance of it, misses and negates the essential purpose of
17 universal service programs. The Natural Gas Choice Act defines "Universal service and energy
18 conservation," as programs that help low income customers "to maintain natural gas supply and
19 distribution services."⁵⁴ In furtherance of this defined purpose, the Act charges the Commission
20 with the obligation to ensure that universal service programs are appropriately funded to ensure

⁵⁰ CPA St. 13-R at 24.

⁵¹ See 2019 Universal Service Report at, 12, 13.

⁵² See Id. at 5, 12, 51 (Columbia reported 400,043 residential customers and 22,707 CAP customers).

⁵³ CAUSE-PA St. 1 at 13.

⁵⁴ 66 Pa.C.S. §2202 ("Universal service and energy conservation").

1 low income customers can maintain service to their home – which in turn led to the Commission’s
2 formal adoption of affordability standards. In adopting lower energy burden standards, the
3 Commission found that CAP rates at the levels charged by Columbia are not reasonable or
4 affordable for low income customers.⁵⁵

5 Ms. Davis also asserts that the Commission should also consider the fact that LIHEAP
6 could further reduce the required CAP payment.⁵⁶ However, the LIHEAP Vendor Agreement
7 plainly states that, “Public utilities that operate a CAP will not consider the customer’s LIHEAP
8 benefit as an available resource in the computation that determines the amount of household’s
9 monthly CAP payment.”⁵⁷ LIHEAP grants are intended to be a supplement to, not a substitution
10 for other resources. While LIHEAP has been in existence for many years, its funding is entirely
11 subject to the uncertainties of federal action, – which means that the program is dependent on the
12 fluctuating level of federal appropriations each and every year. The timing, amount, and conditions
13 accompanying the Federal LIHEAP grant to Pennsylvania may change from year to year. In recent
14 years, LIHEAP was proposed to be cut – in its entirety – from the federal budget. LIHEAP is not
15 an entitlement program, and there is no guarantee that funds will be available in the future.

16 Ms. Davis asserts that Columbia “must continue to weigh the benefits and costs for all of
17 its customers and should not overcompensate for one population segment to the detriment of
18 another.”⁵⁸ Sadly, this statement evidences a clear misunderstanding of the essential purpose of
19 universal service programs, the current circumstances facing Columbia’s low income customers,
20 and the need to establish just and reasonable rates for all consumers – including those who have
21 been designated by statute, regulation, and tariff, as unable to reasonably afford to pay full tariff

⁵⁵ Final CAP Policy Statement Order at 27.

⁵⁶ CPA St. 13-R at 27.

⁵⁷ See Pa. Dept. of Human Services, 2021 LIHEAP Vendor Agreement at p. 2 ¶ 3 (Attached hereto as Appendix B.).

⁵⁸ CPA St. 13-R at 27.

1 rates. The entire concept of universal service programs is to ensure services are universally
2 accessible – regardless of class or economic status. It is neither just nor reasonable to establish
3 rates that a segment of the population simply cannot afford to pay.

4 As I explained in my direct testimony, roughly 17-24% of Columbia’s residential
5 customers are considered to be “low income” – meaning their household income is at or below
6 150% of the federal poverty level.⁵⁹ These customers most often lack the resources to afford their
7 monthly expenses without assistance and face disproportionate energy burdens resulting in
8 increased payment trouble and terminations.⁶⁰ As a result, many forego food and medicine or keep
9 their homes at unsafe temperatures to avoid termination.⁶¹ Once terminated, low income families
10 face high rates of eviction - leading to increased homelessness. Children are often removed from
11 the home following the loss of water, gas, or electricity, and families may resort to unsafe heating
12 measures that can result in fire.⁶² Ms. Davis’s concerns about weighing the benefits and costs for
13 its customers should take these factors into consideration, giving proper weight to the fact that
14 thousands face involuntary termination of life’s essential services – not because they do not want
15 to pay . . . but because they *cannot* pay.

16 **Q: What is your response to Ms. Davis’ argument that your recommended CAP Monthly**
17 **Review Process would be costly and burdensome?**

18 A: I disagree. Ms. Davis argues that the biannual CAP rate review is a manual process, and
19 the Company does not lower the CAP rate for customers that “refused to cooperate with
20 weatherization efforts,” if the LIHEAP grant satisfies that particular customer’s annual CAP bill,

⁵⁹ CAUSE-PA St. 1 at 6.

⁶⁰ Id. at 10-11.

⁶¹ Id. at 13.

⁶² Id. at 16-17.

1 or if the customer receives stipends for utility assistance and has already amassed a large credit on
2 their bill.⁶³

3 These are arbitrary restrictions that appear to be inconsistent with Columbia’s statutory
4 duty to provide customers with the best available rate.⁶⁴ I also understand from counsel that
5 Columbia entered a settlement agreement to conduct biannual review of CAP rates which did not
6 contain these additional exceptions,⁶⁵ the legal ramifications of which will be addressed through
7 briefing. Given that CAP customers are intended to receive the most favorable available rate, I am
8 greatly troubled by Columbia’s arbitrary determination to exclude certain CAP customers from
9 receiving the most affordable rate.

10 Regarding the first group excluded from Columbia’s CAP rate adjustment process, I note
11 that it is unlikely CAP customers know about the biannual rate review process, which in turn makes
12 it unlikely that excluding customers who “refused to cooperate with weatherization efforts” will
13 motivate them to participate. It is also entirely unclear how and when Columbia determines that a
14 customer is “refusing” to participate in LIURP. As I addressed above, Columbia considers a lack
15 of response to be synonymous with lack of cooperation, which fails to recognize the strain of
16 poverty on low income consumers. Low income families face unique barriers to participation in a
17 program like LIURP, which requires a contractor to perform work in the home, during normal
18 business hours. What may seem like a refusal to Columbia may in fact be a barrier beyond the
19 consumer’s control, such as inflexibility at work or lack of reliable telecommunication services
20 and transportation.

⁶³ CPA St. 13-R at 29.

⁶⁴ 66 Pa. C.S. §1303.

⁶⁵ Pa. PUC v. Columbia, R-2018-2647577, Joint Petition for Settlement at ¶ 57 (Filed Aug. 31, 2018).

Columbia agrees to conduct a bi-annual review of accounts enrolled on the average of payments and percent of bill CAP payment plan options that exceed the maximum energy burden recommended by the Commission in the CAP Policy Statement. The Company will change each account to a lower payment plan option, if available.

1 Regarding Columbia’s exclusion of certain LIHEAP recipients from the biannual rate
2 review process, I am concerned that Columbia appears to be acting in violation of its LIHEAP
3 vendor agreement with the Department of Human Services. According to the Vendor Agreement,
4 public utilities that operate a CAP are not allowed to consider the customer’s LIHEAP benefit as
5 an available resource in the computation that determines the amount of household’s monthly CAP
6 payment.⁶⁶ By executing the Vendor agreement, utilities agree: “To not discriminate against any
7 eligible household in regard to terms and conditions of sale, credit, service or price, nor treat
8 adversely any household receiving LIHEAP because of such assistance.”⁶⁷ If Columbia is, in fact,
9 in violation of its vendor agreement, that could jeopardize Columbia’s ability to accept LIHEAP
10 grants on behalf of its low income customers. I understand from counsel that the legal aspects of
11 this issue will be addressed further through briefing.

12 Finally, it is entirely unclear how Columbia identifies households who receive a “stipend”
13 for their utility assistance for exclusion from the CAP rate adjustment process – or why they would
14 exclude those who have amassed a “large” credit on their bill. If a customer pays in advance, such
15 that there is a credit on their account, that does not mean they should be charged higher rates than
16 other CAP customers. Low income households may pay in advance for many reasons – they may
17 have applied for grant assistance, a friend or family may have provided assistance, or they may
18 just be paying more when they can to get ahead of higher winter costs. Columbia has not defined
19 what it would consider a “large” credit – or how many months a customer must carry a credit to
20 be excluded from the rate adjustment process.

21 Columbia is unfairly singling out certain CAP customers for inequitable treatment in
22 application of rates based on unclear, potentially inconsistent, unapproved, and unpublished

⁶⁶ See Appendix B, 2021 LIHEAP Vendor Agreement at p. 2 ¶ 3.

⁶⁷ Id. at p. 4 ¶ 12

1 standards. Columbia must immediately cease these arbitrary and discriminatory restrictions and
2 begin including all CAP customers in its periodic CAP rate adjustment process such that all CAP
3 customers receive the most affordable rate. I note that this consistency in the treatment of all CAP
4 customers should make it easier for the Company to automate the process and adopt my
5 recommendation that the Company implement a monthly screening process.

6 **III. PERFORMANCE METRICS**

7 **Q: Please summarize your recommendation about performance metrics and outcome**
8 **objectives regarding Columbia’s provision of service to its low income customers.**

9 A: In my direct testimony I recommended that Columbia establish benchmarking goals for its
10 CAP enrollment based on the percentage of its estimated low income customers.⁶⁸ Specifically, I
11 recommended that Columbia strive to increase its CAP enrollment by a minimum 5% each year
12 as a percentage of its estimated low income customers.⁶⁹ I also recommended that the Commission
13 require Columbia to reduce the gap between its residential and confirmed low income payment
14 troubled and termination rates by at least 5% per year, and that Columbia should be subject to an
15 objective decrease to any future proposed residential rate increase if they fail to improve these
16 critical low income customer service metrics.⁷⁰

17 **Q: Please summarize the testimony, to which you respond, of Columbia witnesses**
18 **Kempic and Davis, regarding your recommended performance metrics.**

19 A: Columbia Witnesses Mark Kempic and Deborah Davis disagree with my recommendations
20 and assert that whether customers choose to enroll in CAP is outside the Company’s control.⁷¹ Mr.
21 Kempic argues that the failure to improve low income customer service should not impact rates

⁶⁸ CAUSE-PA St. 1 at 38-40.

⁶⁹ Id.

⁷⁰ Id.

⁷¹ CPA St. 1-R at 10; CPA St. 13-R at 25.

1 and argues that – upon advice of counsel – he believes there is no authority in statute or regulation
2 to support this proposal.⁷²

3 Ms. Davis disagrees that the Company should be required to reduce its disproportionately
4 high rate of service terminations for low income consumers. In arguing against any requirement
5 to reduce low income termination rates, she asserts such requirement would lead to increased debt
6 on low income customers' accounts and argues that the Commission ordered utilities to conduct
7 faster CAP terminations in its Final CAP Policy Statement.⁷³ She also argues that the number of
8 confirmed and estimated low-income customers are two metrics that are highly inconsistent
9 between different utilities, as those classes are defined by each utility in unique ways, and disagrees
10 with my explanation that the estimated low income figure is more accurate when analyzing various
11 data.⁷⁴ According to Ms. Davis, the Company does not serve all parts of all counties equally and,
12 therefore, the estimated low-income customer count can only be considered as an estimate or, at
13 best, a potential low-income count and that Columbia should be measured based on the Company's
14 efforts and not on customer behavior, which is outside of the Company's control.⁷⁵

15 **Q: What is your response to Mr. Kempic and Ms. Davis's assertion that whether**
16 **customers choose to enroll in CAP is outside the Company's control?**

17 A: I agree that customer enrollment is ultimately a decision to be made by the customer.
18 However, I disagree that such a decision is entirely divorced from a Company's actions. If the
19 programs are adequately structured, funded, and promoted, and customers understand the
20 programs and the benefits they can derive, then enrollment will follow. It is telling that even a
21 majority of the customers whom Columbia has identified as confirmed low income are not enrolled

⁷² CPA St. 1-R at 10.

⁷³ CPA St 13-R at 30-31.

⁷⁴ Id.

⁷⁵ Id. at 20.

1 in CAP.⁷⁶ Customers may not be enrolling because they do not deem Columbia’s payment plans
2 as affordable, which is an issue that the Company can address by adopting my recommendation
3 that Columbia adopt Commission's CAP Energy Burdens. Of course, as I discussed at greater
4 length above, customers may also not be enrolling because they are not aware of the existence of
5 the programs or that they are eligible, which are issues that the Company can address by adopting
6 my recommendations that the Company begin screening for income and providing referrals to all
7 new/moving customers to help reduce that gap. Unfortunately, a significant reason for my concern
8 about the need for Columbia to adhere to objective performance metrics can be found in the
9 testimony of its Universal Service Program Manager that: a) every confirmed low income
10 Columbia customer already knows about CAP; b) low income are naturally going to be payment
11 troubled and involuntarily terminated; and c) CAP enrollment is beyond the Company’s control.
12 These statements, made in response to my testimony of a CAP participation rate of only 35% of
13 confirmed low income customers⁷⁷ and a significant disparity between the payment troubled and
14 termination rates of Columbia’s low income and other residential customers,⁷⁸ indicate to me that
15 without objective performance goal levels, Columbia management will take no action to remedy
16 these structural universal service deficiencies.

17 **Q: How do you respond to Mr. Kempic’s argument that the failure of Columbia to**
18 **improve low income customer service should not impact rates and that there is “not**
19 **authority in statute or regulation”**

20 A: I disagree. Preliminarily, I understand from CAUSE-PA’s counsel that Mr. Kempic’s
21 argument that there is “not authority in statute or regulation” is a legal conclusion that will be

⁷⁶ CAUSE-PA St. 1 at 20-21.

⁷⁷ Id.

⁷⁸ Id. at 14-15.

1 addressed through briefing. However, to the extent that a response on the record is necessary,
2 section 1301 states that rates must be just and reasonable.⁷⁹ Customer service and quality of service
3 fall squarely within the criteria for evaluating whether rates are just and reasonable and,
4 specifically, whether Columbia is delivering just and reasonable service to low income households.
5 If Columbia is not providing equitable service to low income communities, the Commission should
6 take that factor into consideration. I am informed by Counsel that the legal issue regarding the
7 effect of an inequitable quality of service on the rate of return will be addressed in briefing.

8 **Q: How do you respond to Ms. Davis's assertion that requiring a reduction in low income**
9 **service terminations would lead to increased debt on low-income customers' accounts?**

10 A: Again, this statement misses the essence and purpose of the public policies which have
11 created universal service programs: to charge affordable rates, reduce collection activity, and avoid
12 termination of service. Chapter 14 clearly distinguishes the collection activities that are appropriate
13 for those who can afford to pay their bills and those who cannot; the Natural Gas Choice Act
14 indicates that CAP rates are to be affordable for low income customers; and the policy driving
15 Chapter 56 is to avoid termination when possible.

16 Ms. Davis's assertion is only true to the extent that Columbia's rates are affordable, and a
17 customer can pay them. When a customer cannot afford to pay, the threat of termination does not
18 motivate payment - it forces customers to make unconscionable tradeoffs for other necessities,
19 such as food and medicine.

20 I continue to recommend that Columbia improve its CAP participation rate and reduce its
21 CAP energy burdens. If CAP customers can afford their bills, payment coverage and frequency
22 rates will increase, and terminations will decrease. Especially considering that Columbia has

⁷⁹ 66 Pa. C.S. § 1301.

1 substantially increased its rates nearly every year for the past ten years and that these customers
2 must rely on its natural gas service for life essential home heating, cooking, and hot water as well
3 as face the potential for eviction and/or loss of child custody if their gas service is terminated.⁸⁰

4 Furthermore, I strongly disagree with Ms. Davis's assertion that the increase in customer
5 debt through the height of the COVID-19 emergency is evidence that removing the threat of
6 termination for nonpayment reduces the motivation for payments.⁸¹ Ms. Davis claims that the
7 emergency moratorium – instituted to ensure Pennsylvanians were able to remain connected to
8 essential services when it was unsafe to leave your home – was the driver of increased debts. In
9 other words, Ms. Davis believes people chose not to pay their bills during this time. This assertion
10 reflects a lack of understanding of the lives of Columbia's low income customers and the profound
11 effect that the pandemic had on low income communities during that time. The global pandemic
12 and economic crisis caused severe economic hardship on Pennsylvania families across the state,
13 and was disproportionately impactful on low wage workers, low income communities, and
14 communities of color. Pennsylvania experienced an unprecedented spike in unemployment rates,
15 and across the state there were lines at food pantries and soup kitchens as families struggled to
16 keep food on the table without a paycheck. Such moratoria were vital to fighting COVID-19
17 infections and deaths nationwide and such moratoria were found to reduce COVID-19 infections
18 by 4.4% and mortality rates by 7.4%.⁸² The lack of payments and program participation during
19 this unprecedented public health emergency and extreme economic downturn only provides further

⁸⁰ CAUSE-PA St. 1 at 16-17.

⁸¹ CPA St. 13 at 30.

⁸² Kay Jowers, Christopher Timmins, Nrupen Bhavsar, Qihui Hu & Julia Marshall, Housing Precarity & the COVID-19 Pandemic: Impacts of Utility Disconnection and Eviction Moratoria on Infections and Deaths Across US Counties, National Bureau of Economic Research, January 2021, available at: <https://www.nber.org/papers/w28394>

1 support that Columbia must expand its assistance programing to address that hardship and improve
2 its customer service to these vulnerable customers.

3 **Q: How do you respond to Ms. Davis’s argument that the Commission’s Final CAP**
4 **Policy Statement ordered utilities to speed up terminations of CAP customers?**

5 A: The Commission statement to which Ms. Davis refers is taken out of context. While the
6 Commission did recommend that utilities should initiate collection activity for CAP accounts that
7 miss two in-program payments, the purpose was to initiate collection activity earlier, before
8 balances had time to grow, *not to increase terminations*.⁸³ The Commission and legislature have
9 repeatedly supported the reduction in low income terminations. In fact, the Natural Gas Choice
10 Act defines “Universal service and energy conservation,” as programs that help low income
11 customers “**to maintain natural gas supply and distribution services.**”⁸⁴ I explained in my direct
12 testimony that, despite comprising only 17.5% of Columbia’s residential customers, confirmed
13 low income customers accounted for 56% of residential terminations.⁸⁵ Columbia is not providing
14 equitable service within its residential customer base if it continues to allow disproportionate
15 terminations to its low income customers. Columbia needs to improve the quality of service that it
16 provides to low income households and needs to be held accountable if it fails to do so.

17 **Q: How do you respond to Ms. Davis’s argument that confirmed and estimated low-**
18 **income counts are two metrics that are highly inconsistent between different utilities?**

19 A: There may be inconsistency in methods and process between utilities; however, my
20 testimony was based upon Columbia’s own data regarding the percentage of its low income CAP

⁸³ Final CAP Policy Statement Order at 73.

⁸⁴ 66 Pa.C.S. §2202 ("Universal service and energy conservation") (emphasis added).

⁸⁵ CAUSE-PA St. 1 at 15.

1 participants and the rate of termination of its low income customers compared to the rate of its
2 general residential customer base.

3 The confirmed low income and estimated low income metrics were established by the
4 Commission to benchmark universal service performance among utilities and, while neither is
5 perfect, they remain the best and only metrics serving this purpose. As I explained in my direct
6 testimony, the estimated low income customer count presents a more accurate picture of
7 Columbia's low income customer population.⁸⁶ Not only is the estimated low income count more
8 reflective of the economic makeup of the service territory, but it is more consistent between utilities
9 because it is based on census data provided by the Commission's Bureau of Consumer Services
10 and is scaled as a percentage of *actual residential customer counts for each county*. While Ms.
11 Davis asserts that the Company's estimated low income count is not perfect because it only applies
12 census data on a county level, this is a benefit to the ability to compare metrics between utilities
13 because utilities measure their estimated low income count the same ways, whereas the confirmed
14 low income number is measured differently across utilities.

15 **Q: How do you respond to Ms. Davis's assertion that that "It is logical to expect that a**
16 **higher percentage of customers with low-income would-be payment troubled.?"**

17 A: This is not logical – nor is it acceptable. Although I addressed this earlier regarding other
18 issues, it is important to directly respond to her testimony. Ms. Davis asserts that only 3.5% of all
19 Columbia residential customers are payment troubled, compared to 12.5% of confirmed low
20 income customers – and that this disparity is 'logical' and, presumably, acceptable.⁸⁷ However,
21 these statistics demonstrate that low income customers are three times more likely to be payment
22 troubled than general residential customers. Columbia's natural gas rates are becoming

⁸⁶ *Id.* at 7.

⁸⁷ CPA St. 13-R at 29.

1 increasingly unaffordable for low income customers and continue to increase substantially year
2 over year. The disparity is not because low income households simply don't want to pay, it is
3 because **they cannot afford to pay**. As I explained in my direct testimony, Columbia's low income
4 customers lack the resources to afford their monthly bills without assistance.⁸⁸ Increasing the rates
5 for an essential service like natural gas year after year without taking steps to improve rate
6 affordability for economically vulnerable households is only furthering that gap. As a regulated
7 utility, Columbia cannot just accept that low income customers cannot afford service and will fall
8 behind on bills and be terminated. They must take steps to make their universal service programs
9 effective and improve affordability and accessibility of service for low income households.

10 **Q: How do you respond to Ms. Davis's assertion that the Company's performance should**
11 **be based on the Company's efforts rather than the outcomes?**

12 A: This would not be an effective means of ensuring that its efforts are working., especially
13 when a company sees no flaw or problem with its methods or programs. For example, the metric
14 used to assess the effectiveness of Columbia's outreach must be Columbia's results. The outreach
15 needs to be evaluated on whether it works, not how much money it spends, the number of
16 pamphlets it distributes, or the number of ads it buys. This necessarily requires an evaluation of
17 the results of the outreach, not just the efforts. Thus, I continue to believe that the Company should
18 be required to measurably improve and benchmark its CAP enrollment rates to reach a greater
19 number of households in need of assistance and to reduce the disparity in termination of service
20 levels to demonstrate specific, measurable improvements to the standard of service for low income
21 consumers.

⁸⁸ CAUSE-PA St. 1 at 10-11.

1 **IV. FIXED CHARGE/REVENUE NORMALIZATION ADJUSTMENT**

2 **Q: Please summarize your recommendations regarding Columbia’s proposed increase**
3 **to its fixed residential customer charge and its proposed Revenue Normalization Adjustment**
4 **(RNA).**

5 A: In my direct testimony, I explained that an increase to the fixed charge and the approval of
6 a proposed RNA reduce the ability of customers to save money through energy conservation, thus
7 undercutting Company’s LIURP investments.⁸⁹ The fixed charge should not be increased, and the
8 Rider RNA should be rejected.⁹⁰

9 **Q: Please summarize response to your recommendation that Columbia’s fixed monthly**
10 **customer charge should not be increased and the proposed RNA be rejected.**

11 A: Columbia witness Johnson argues that the Company has not had an increase in its customer
12 charge since 2012.⁹¹ He argues that LIURP customers are typically higher volume users so shifting
13 to volumetric rate would increase bills more for these customers.⁹² He argues that LIURP
14 customers have higher usage and assigning the entire rate increase to the volumetric charge would
15 result in higher rates for LIURP customers.⁹³ He also argues, by increasing the customer charge,
16 customers would see decreased bills during the heating season when bills are typically higher by
17 shifting those costs to the non-heating months.⁹⁴ Regarding my recommendation that Columbia’s
18 proposed RNA be rejected, he argues that not all of the savings associated with energy efficiency
19 measures will be eliminated by the RNA.⁹⁵

⁸⁹ CAUSE-PA St. 1 at 33-38.

⁹⁰ Id.

⁹¹ CPA St. 6-R at 35.

⁹² Id.

⁹³ Id. at 38.

⁹⁴ Id. at 40-41

⁹⁵ Id. at 56-57.

1 **Q: How do you respond?**

2 A: I stand by my recommendation that the fixed monthly customer charge should not be
3 increased. It is irrelevant how long the current fixed charge has been in place. Columbia already
4 has the highest fixed charge among all Pennsylvania's NGDCs and it does not need to be
5 increased.⁹⁶ I explained at length in my direct testimony the impact that the proposed fixed charge
6 increase would have on low-income households and the need for these customers to be able to
7 mitigate the impact of any rate increase through conservation measures, including through
8 LIURP.⁹⁷ The simple fact is that increases to the volumetric charge can be mitigated through
9 conservation measures, whereas increases to the fixed charge cannot. Energy efficiency and
10 conservation can be highly effective at helping to control CAP customer bills, providing savings
11 to both the CAP customer and to other residential ratepayers - including non-CAP low-income
12 customers - who pay for CAP through rates. Increasing the fixed customer charge threatens the
13 ability for low-income households to effectively reduce their bill through energy efficiency and
14 conservation, further exacerbating unaffordability.

15 Mr. Johnson claims that Columbia's proposed \$8.72 fixed monthly residential customer
16 charge (\$104.64 annually) does not undermine LIURP's intent to reduce low-income customer
17 bills because LIURP customers have high usage and would thus pay less under the Company's
18 proposal than if the fixed charge were not increased.⁹⁸ However, LIURP is explicitly "intended to
19 *assist low income customers conserve energy and* reduce residential energy bills."⁹⁹ Columbia
20 should not be allowed to circumvent its obligation to assist customers to reduce energy simply by
21 charging more through a fixed rate. Columbia needs to keep its current fixed charge in place and

⁹⁶ OCA St 3 at 15.

⁹⁷ CAUSE-PA St. 1 at 34-37.

⁹⁸ CPA St. 6-R at 37-38.

⁹⁹ 52 Pa. Code § 58.1 (emphasis added).

1 focus on improving the effectiveness and reach of its LIURP program to reduce low income
2 customer usage, especially for the highest users.

3 I also take issue with Mr. Johnson's assertion that increasing the customer charge would
4 decrease bills during the heating season by shifting those costs to the non-heating months.¹⁰⁰
5 Customers would just wind up paying more in non-heating months – when they are likely paying
6 more for electric cooling. If customers want a more predictable bill that spreads the charges
7 between heating and non-heating seasons, they have the option to enroll in budget billing. They
8 should not be forced into it through a high fixed charge.

9 Regarding Mr. Johnson's response to my recommendation that the RNA be rejected, his
10 testimony and exhibit demonstrates that the RNA would indeed have a detrimental effect on the
11 ability to reduce bills through usage reduction. His exhibit KLJ-4R demonstrates bill savings
12 attributable to the energy efficiency measures would be substantially reduced by between
13 approximately 5% to 35%,¹⁰¹ thus undercutting the customer's ability to recognize bill savings
14 through these measures.

15 V. ENERGY EFFICIENCY AND CONSERVATION (EE&C)

16 **Q: Please summarize your recommendations regarding the Company's proposed EE&C**
17 **program.**

18 A: In my direct testimony, I pointed out that Columbia's proposed EE&C program did not
19 contain any component to specifically address low income customers.¹⁰² I recommended that
20 Columbia revise its Plan to include a targeted low income energy efficiency program specifically
21 designed to serve low income customers.¹⁰³ I recommended that Columbia target low income

¹⁰⁰ CPA St. 6-R at 40-41

¹⁰¹ See Id. at 57, Ex. KLJ-4R

¹⁰² CAUSE-PA St. 1 at 30.

¹⁰³ Id. at 31.

1 customers who are ineligible for LIURP because they do not meet the minimum usage threshold,
2 as well as targeting low income residential tenants.¹⁰⁴ I recommended Columbia take steps to
3 better coordinate its EE&C program with its LIURP and its Audits and Rebates (A&R) program.¹⁰⁵

4 **Q: Please summarize the response to your recommendations regarding the EE&C plan.**

5 A: Columbia witness Davis argues that Low-income customers will have both components of
6 the proposed Energy Efficiency program available to them.¹⁰⁶ She indicates that all customers
7 that request information about the Energy Efficiency program will be screened for the LIURP and
8 A&R programs first to maximize the benefits they may be eligible to receive.¹⁰⁷ Ms. Davis and
9 Mr. Love indicate that Columbia's A&R program is available to customers who are not eligible
10 for LIURP, including non-CAP customers, and are at or below 250% of FPL and offers a free
11 audit, smart thermostats, and rebates on specific energy efficiency measures.¹⁰⁸ She points out that
12 the Emergency Repair program operates on a first-come, first-serve basis and typically exhausts
13 its annual budget and the program does install energy efficient appliances when replacing
14 equipment.¹⁰⁹

15 **Q: What is your response?**

16 A: The fact that the proposed EE&C program would be generally available to low income
17 customers is not the same as having a specifically targeted program, nor does it mean the program
18 is accessible regardless of targeting. Despite Ms. Davis's claim that Columbia's program is like
19 UGI and PGW, this is not the case. PGW has made enhanced rebates available to low income
20 households, and is required to coordinate those rebates with local service providers that can cover

¹⁰⁴ Id. at 32.

¹⁰⁵ Id. at 32-33.

¹⁰⁶ CPA St. 13-R at 7.

¹⁰⁷ Id.

¹⁰⁸ Id.; CPA St. 16-R at 10.

¹⁰⁹ CPA St. 13-R at 9.

1 any incremental cost and assist with direct installation.¹¹⁰ UGI specifically increased its LIURP
2 budget to increase the overall amount of its EE&C services to low income households at a level
3 proportionate to the low income customer population.¹¹¹ UGI also adopted specific programming
4 for affordable multifamily housing providers.¹¹² PECO Gas also operates a voluntary EE&C
5 program, which includes substantial funding for a targeted low income program to ensure safe and
6 efficient heating systems are installed and properly maintained in low income homes.¹¹³ Columbia
7 has not proposed any of these kinds of steps – either in terms of increased funding or targeted
8 programming – to ensure its programming is equitably accessible to low income households.

9 I recognize that Columbia is providing some of the services I recommended through its
10 A&R program, however, low income households do not have the resources to afford upfront costs
11 to purchase energy efficiency measures out of pocket and wait for a partial rebate that comes later.
12 I do appreciate that the A&R program and Emergency Repair are available to assist low income
13 customers with energy efficiency measures. Considering this testimony and to ensure that the
14 benefits of Columbia’s proposal reach its low income customers, Columbia should expand the
15 ability of those existing programs to proportionately serve low income customers.

16 **Q: Does that conclude your Surrebuttal Testimony?**

17 A: Yes.

¹¹⁰ See Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2021-2023, P-2014-2459362, Revised Implementation Plan Fiscal Years 2021-2023 (Filed June 4, 2021).

¹¹¹ See Petition of UGI Utilities, Inc. - Gas Division for Approval of a Minor Change to Its Energy Efficiency and Conservation Plan, R-2018-3006814, Revised Energy Efficiency and Conservation Plan (Filed July 23, 2021).

¹¹² Id.

¹¹³ See Pa. PUC v. PECO Energy – Gas Division, R-2020-3018929, Final Order at 115-116 (Entered June 22, 2021).

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX A

CITED DISCOVERY RESPONSES

Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) to Columbia Gas of Pennsylvania (CPA)

- CAUSE-PA to CPA III-13
- CAUSE-PA to CPA IV-14.

Question No. CAUSE-PA 3-013

Respondent: D. Davis

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Columbia Gas of Pennsylvania, Inc.

**COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING**

Docket No. R-2022-3031211

Data Requests

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 3**

Question No. CAUSE-PA 3-013:

Please explain how Columbia calculates the amount of LIURP funds it recovers through its Rider USP.

Response:

Columbia projects the Rider cost based on the required spend and any carryover from the previous year. Once a year, the Company files a reconciliation which adjusts the rider for any over/under based on actual spend and projects what is needed for the coming year based on current required annual spend.

Columbia Gas of Pennsylvania, Inc.

COLUMBIA GAS OF PENNSYLVANIA, INC.
2022 RATE CASE PROCEEDING

Docket No. R-2022-3031211

Data Requests

COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN
PENNSYLVANIA (CAUSE-PA) INTERROGATORIES
Set 4

Question No. CAUSE-PA 4-014:

See Columbia Statement 13-R at p. 5 lines 8 through 21, for the years 2018 to present, how many LIURP defaults were attributable to the following reasons:

- a. Structural issues.
- b. The customer cannot take time off from work.
- c. The customer has a household member that may have adverse reactions to weatherization.
- d. The customer is reluctant to have people in their homes due to the COVID-19 pandemic or for other reasons.
- e. The customer has an unpredictable schedule.
- f. The customer was not home when the contractor arrived at the scheduled time.

Response:

Please see the chart below for the requested data. Please note b, d and e were included in testimony as examples that were provided by contractors. The Company does not track the specific reasons a customer chooses to not respond or refuses weatherization. Therefore, the Company has included more generalized reasons codes for defaulted jobs that are tracked. Due to personnel issues with the LIURP program staff and contractors, tracking reasons for cancelled jobs was not entered as regularly in years 2020 and 2021.

Question No. CAUSE-PA 4-014

Respondent: D. Davis

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	2018	2019	2020	2021	YTD 2022
a. Structural Issues	176	139	24	28	8
b time off from work	not tracked specifically				
c. Health Issues	10	14	1		1
d. covid 19 or other	not tracked specifically				
e. unpredictable Schedule	not tracked specifically				
f. Customer Not Home for appointment	1	6	2	5	5
No Response from Customer	278	181	95	70	30
Customer Refused	45	33	27	22	17

**THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY
EFFICIENCY IN PENNSYLVANIA**

APPENDIX B

LOW INCOME HOME ENERGY ASSISTANCE PROGRAM

2021 VENDOR AGREEMENT - UTILITY



Pennsylvania Department of Human Services
LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM
2021 VENDOR AGREEMENT - UTILITY

Vendor Name and Address

Vendor Number

This Agreement is entered into for the purpose of facilitating the provision of Low-Income Home Energy Assistance Program (LIHEAP) benefits to low-income households through the delivery of utility service from a participating LIHEAP vendor to the LIHEAP beneficiary who is a customer of the vendor. The Commonwealth of Pennsylvania defines a LIHEAP vendor as a company or agent of the company that supplies home heating energy or service in exchange for payment. The term does not include landlords, housing authorities, hotel managers or proprietors, rental agents and other parties who are not direct suppliers of home heating, energy or service.

A new LIHEAP Vendor Agreement is required every two years unless changes require this time frame to be shortened. **This agreement will terminate June 30, 2023, unless superseded by a new agreement, or terminated for convenience upon 30-day written notice by either DHS or by the vendor. Failure to comply with any of these conditions may result in removal from the approved vendor file and suspension of further payments to the vendor for client services.**

LIHEAP consists of two components. Eligible LIHEAP households receive one LIHEAP Cash grant based on the size, region, income and fuel type of their household. Receipt of a customer's LIHEAP Cash grant requires no data entry by the vendor. LIHEAP Crisis grants are available to LIHEAP recipients who encounter a heating emergency. Vendor data entry is required to receive payment for a Crisis grant. Subject to the availability of funds, the Department of Human Services (DHS) may opt to provide eligible LIHEAP households with additional LIHEAP grants.

By signing this agreement, the Vendor agrees to communicate with DHS by phone and email and be responsive to DHS requests so that a customer's LIHEAP application or request for Crisis can be processed timely. The vendor also agrees to accept all LIHEAP grants and apply them to customer accounts according to the conditions of this vendor agreement and DHS instructions.

Participating LIHEAP vendors are paid through the Pennsylvania Treasury by check or direct deposit. A list of corresponding payments is posted to the LIHEAP Crisis Claim data entry system, identifying customer names, addresses and the amount of LIHEAP Cash and Crisis payments each customer will receive, associated with a specific Treasury Pay Date.

The business or company written above, herein referred to as the "vendor," cannot enter into any subcontracts under this agreement with other subcontractors who are currently suspended or debarred by the commonwealth or other state or federal government. If any vendor enters into any subcontracts under this agreement with any subcontractors who become suspended or debarred by the commonwealth or other state or federal government during the term of this agreement or any extensions or renewals thereof, the commonwealth shall have the right to require the vendor to terminate such subcontracts to remain a LIHEAP vendor.

The vendor agrees to be responsible for reimbursing the commonwealth for all necessary and reasonable costs and expenses incurred by the Office of the Inspector General or the Attorney General relating to an investigation of the vendor's compliance with the terms of this or any other agreement between the vendor and the commonwealth which results in the suspension or debarment of the vendor.

Vendors will adhere to LIHEAP policy and procedures as defined in the LIHEAP State Plan, will report any discovery of fraud, and address any questions regarding participation in LIHEAP to the LIHEAP Vendor Unit. A copy of the LIHEAP State Plan can be found on the LIHEAP Vendor Website at: www.dhs.pa.gov/providers/Providers/Pages/LIHEAP-Vendors.aspx.

By fully completing and submitting the signature page of the 2021 LIHEAP Vendor Agreement by July 1, 2021, the vendor agrees to comply with the following conditions to remain a LIHEAP Vendor in good standing and receive LIHEAP payments through the commonwealth:

1. Apply LIHEAP grants to customer accounts in the following manner only:
 - a) Apply the full amount of each LIHEAP benefit to the respective account of each designated LIHEAP customer. For customers who have chosen their own supplier, the entire LIHEAP grant must be applied to cover the costs of both the distribution and supply portion of the bill each month until the LIHEAP benefit has been exhausted.
 - b) Any existing LIHEAP credit, **including the LIHEAP Cash grant that has been authorized and not yet received**, is considered to be available and will be used to resolve a customer's request for Crisis. LIHEAP credits must be entered in the Crisis Claim data entry system when submitting a claim.
 - c) Late payment charges must be frozen at the amount they are at the time notification of eligibility for LIHEAP is received by the vendor and may not be increased for the remainder of the LIHEAP program year, defined as the date that applications for LIHEAP benefits are no longer accepted.
 - d) LIHEAP Cash and Crisis grants may be used for reconnection fees but will not be used for security deposits, service maintenance contracts, or other finance charges.
2. Public utilities that operate Customer Assistance Programs (CAP) will:
 - a) Contact customers and attempt to enroll in CAP (if not already enrolled) when the utility becomes aware that the household is low-income, validated by receipt of a LIHEAP Cash or Crisis grant.
 - b) Apply the LIHEAP Cash grant to the customer's account in the following manner:
 - To resolve any past-due CAP payments,
 - To the current CAP payment,
 - Remaining LIHEAP funds will be credited to future CAP payments.

NOTE: A CAP payment is the amount the customer is required to pay under the terms of the utility's CAP agreement.
3. Public utilities that operate a CAP will not consider the customer's LIHEAP benefit as an available resource in the computation that determines the amount of household's monthly CAP payment.
4. LIHEAP Cash grants received on behalf of a LIHEAP customer are available to cover utility costs for the season in which they are authorized through the end of the following heating season. See Section 8: Vendor Refunds.
5. LIHEAP Crisis grants and Cash grants that are used to resolve a Crisis may be used in the following manner:
 - a) To prevent termination or restore home-heating service to a household that is without heat due to termination of the main or secondary source of heat by a utility company.
 - b) Are authorized by DHS or its representatives **in the minimum amount needed to resolve the Crisis** based on the amount listed on a utility termination notice, subject to the minimum and maximum LIHEAP Crisis benefits allowed.
 - c) The existence of a Crisis must be validated by a DHS representative, including the minimum amount needed to resolve the utility emergency. A utility's plan to terminate service is considered to be valid for 60 days from the date of the termination notice, even if service was not terminated after the 10-day period indicated on the notice.
 - d) Are only guaranteed for authorizations approved by DHS or its representatives. Every request for Crisis must be made by the LIHEAP household to its designated DHS office, which will evaluate eligibility and determine the amount the household has available to resolve the Crisis. A DHS representative will contact the vendor to convey eligibility.
 - e) A Crisis authorization number is issued to resolve a specific Crisis situation.
 - f) Vendors must maintain service to such households for no less than 30 calendar days from the date of the resolution of the Crisis. In some circumstances the 30-day hold may not begin until the end of winter moratorium.
 - g) Utility companies governed by the Public Utility Commission will adhere to the winter termination procedure referred to in §601.62(2) (ii)(A) of Appendix B of the LIHEAP State Plan.
 - h) Customers approved for a LIHEAP Crisis grant related to the LIHEAP Term Program (including the Utility File Transfer Program) are not eligible to receive a duplicate LIHEAP Crisis grant pledged at the request of the household for the same 30-day pledge period.
 - i) Regulated utilities that accept a Crisis grant during the winter moratorium period (12/1- 3/31) must maintain service until at least May 1. In most instances, this precludes the issuance of an additional Crisis grant to the same utility for the same household for the remainder of the season, since the 30-day hold on the account begins on April 1.
 - j) Vendors will make every attempt to resolve the customer's heating emergency with consideration of the following time frames:

- Before the customer is without heat;
 - Within 48 hours if the customer is already without heat; or
 - Within 18 hours if a medical emergency or life-threatening situation exists.
6. An active worklist of Crisis authorizations awaiting vendor action is available on the Crisis Claim data entry system.
 7. To receive payment paid in full or in part with **LIHEAP Crisis funds**, the vendor must perform Crisis Claim data entry into a web-based program and submit documentation of the termination by mail, fax, or electronic upload. Payment may be rejected if appropriate documentation is not provided.
 - a) Claims must be processed **within 30 calendar days** of the date a Crisis grant is authorized by DHS. Exceptions to the 30-day rule may be granted for claims entered on or after the 31st day and up to 30 days after the close of the LIHEAP season if funds are available.
 - b) The amount paid with Crisis funds will be no more than the amount authorized by a DHS representative to resolve the emergency.
 - c) Any available LIHEAP credits on the customer's account must be entered in the Crisis Claim data entry system.
 - d) Acceptable Crisis documentation includes a termination or restoration notice confirming the dollar amount needed to restore service or prevent service interruption. Failure to provide adequate documentation will delay payment.
 - e) LIHEAP recipients cannot be billed for services or late payment fees as a result of a vendor's failure to comply with the conditions of this agreement.
 8. Refund LIHEAP credits to DHS as required, by check or expedited recoupment, within 30 days from the date of discovery, after the basis for return is known. A LIHEAP Refund Form (HSEA 37) must accompany payment. **It is also important to indicate the individual number of the customer that was provided on the LIHEAP Provider Payment List when payment was received** and a description of the reason the funds are being returned. A user-friendly form is located on the LIHEAP Vendor website. The commonwealth cannot return vendor funds or any portion thereof to the vendor. **For this reason, LIHEAP Vendors should accurately evaluate their records and ensure the accuracy of LIHEAP refunds before submitting them to the Commonwealth of Pennsylvania.** Vendors may contact the Vendor Unit at 1-877-537-9517 to verify dates/amounts of LIHEAP grants received by the households before sending a refund check.

NOTE: Vendors will never give or refund LIHEAP funds to a customer.

LIHEAP refunds will be sent with a check payable to the **COMMONWEALTH OF PENNSYLVANIA**, directed to:

**DHS-LIHEAP Vendor Refunds
P.O. Box 2675 (WOB Room 224)
Harrisburg, PA 17105-2675**

- a) **Examples when the vendor will return LIHEAP credits include, but are not limited to the following:**
 - A customer's whereabouts are unknown,
 - A customer changes vendor,
 - A customer dies, departs the area serviced by the vendor, or the customer no longer has a heating responsibility,
 - The vendor receives a duplicate payment,
 - The vendor is deactivated and is no longer a participating LIHEAP vendor,
 - LIHEAP Cash grants received in error,
 - An overpayment caused by vendor error. Vendor error includes but is not limited to: the vendor failing to provide appropriate or accurate customer account information, non-equitable pricing, LIHEAP funds were erroneously applied toward a security deposit, a billing error or application of LIHEAP funding is detected, failure to provide service, or using a communal account for LIHEAP funds. If this occurs, the vendor is responsible for reimbursement from the vendor's funds, not by removing LIHEAP credits from the customer's account.
 - The end of each LIHEAP program year. LIHEAP funds are available for use for two heating seasons, which includes the heating season of receipt and the heating season immediately following. LIHEAP funds that have not been expended must be returned to DHS by July 31 of that year. DHS will send an email to remind vendors to review/identify accounts and return LIHEAP funds.
- b) DHS is authorized to recoup past-due LIHEAP balances by debiting any current or future LIHEAP payment for an amount equal to the outstanding un-refunded balance that is due to DHS from the vendor. A record of the balance of funds owed is established by DHS who contacts the vendor to request a refund and confirm the amount. DHS will send the vendor up to three dunning letters

requesting payment of the funds. If the vendor fails to respond after the third notice, the amount of the balance of funds owed to DHS will be deducted from the vendor's next payment(s) until the funds are repaid. The vendor acknowledges that DHS will reduce vendor payments by the amount of the balance of funds owed to allow for the expeditious collection of these debts. If funds are unable to be recouped, outstanding balances will be referred to the Attorney General's Office for collection proceedings and all other legal remedies.

NOTE: Vendors have the option to set up expedited recoupment to return LIHEAP funds.

9. Provide all requested information established in DHS policies and procedures. This could include information on the annual heating usage and cost incurred by LIHEAP households necessary for compliance with federal reporting requirements if this information is gathered by customer name or account number and the customer has been served by the vendor at the same address for the entire annual period.
10. Vendors are holding, on DHS' behalf, federal money for the benefit of recipient customers. Vendors are prohibited from using LIHEAP funds for purposes other than home heating. This requirement does not supersede the provisions of the Federal Bankruptcy Act, 11 U.S.C., Section 366.
11. To promptly notify the LIHEAP Vendor Unit whenever discrepancies in approved applications are found. Examples include a vacant residence, a request for service at an address other than what was indicated on the Remittance Advice (payment voucher) or other situations when the vendor is aware of potentially fraudulent activity.
12. To not discriminate against any eligible household in regard to terms and conditions of sale, credit, service or price, nor treat adversely any household receiving LIHEAP because of such assistance.
13. To ensure the retention of LIHEAP customer confidentiality in the use of social media.
14. To notify DHS at least 120 days before filing for bankruptcy and return all funds not expended on LIHEAP clients at least 91 days before filing for bankruptcy.
15. To resolve crisis payment disputes with DHS' Bureau of Hearings and Appeals if not resolved informally with DHS staff.
16. To present for review or reproduction records maintained by the vendor concerning overall pricing, conditions of sale, credit, and service upon request by DHS for audit or investigation purposes, as provided in this agreement.
17. If DHS receives a notice of levy, DHS will turn over rights to property such as money, credit and deposits in accordance to the notice.
18. Vendors will retain all books, records and documents pertaining to LIHEAP payments **for four years from the receipt of payment** or until all questioned costs or activities have been resolved to the satisfaction of the commonwealth, or as required by applicable federal laws and regulations. All records must be maintained in a legible, readable condition. If records are maintained in a computer, the vendor must cooperate in providing printed versions of such records. Recipient-specific records should clearly identify both Cash and Crisis payments from LIHEAP, charges to the account, and documentation supporting these entries by individual household.

The commonwealth reserves the right for state and federal agencies or their authorized representatives to perform financial and compliance audits if deemed necessary by commonwealth or federal agencies. If an audit of this agreement will be performed, the vendor will be given 60 days advance notice.

LIHEAP VENDOR HELPLINE
Toll Free Number 1-877-537-9517
Fax 717-231-5516
Email Address: RA-LIHEAPVendors@pa.gov

LIHEAP VENDOR WEBSITE
www.dhs.pa.gov/providers/Providers/Pages/LIHEAP-Vendors.aspx

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-2022-3031211
Columbia Gas of Pennsylvania, Inc. :


VERIFICATION

I, Harry S. Geller hereby state that the facts set forth in:

- CAUSE-PA Statement 1,
- CAUSE-PA Statement 1-R
- CAUSE-PA Statement 1-SR

are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities.)

August 2, 2022
Date



Harry S. Geller