



June 7, 2022

Honorable Christopher P. Pell
Deputy Chief Administrative Law Judge
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Honorable John Coogan
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Office of Administrative Law Judge
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**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2022-3031211**

Judge Pell and Judge Coogan:

Please find the attached **Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) Statement 1, the Direct Testimony of Harry S. Geller** in the above noted proceeding.

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".

John W. Sweet
Counsel for CAUSE-PA

CC: *Athena Delvillar* (sdelvillar@pa.gov)
Certificate of Service
Secretary Rosemary Chiavetta (Cover and COS only)

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 **Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) Statement 1, the Direct Testimony of Harry S. Geller** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

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June 7, 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

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](https://www.aceee.org/sites/default/files/publications/researchreports/u1602.pdf) (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.

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	

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.
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Docket No. R-2022-3031211

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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.
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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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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.
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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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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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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 arrearage for residential customers	(j) The average arrearage 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

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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.
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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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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.

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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
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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 2-001:

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
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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 2-002:

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

Page 2 of 2

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
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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 2-007:

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.

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 Memebbers 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)	97,268		
<i>Submit Estimation Methodology in a Separate Document</i>			
12. B. Annual Residential Revenues (\$)	\$431,312,024	\$78,879,165	

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		
		Value
36. Participation Levels: Default Exits - Income at or below 50% of Poverty (#)	1,014	

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. Utlity 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!

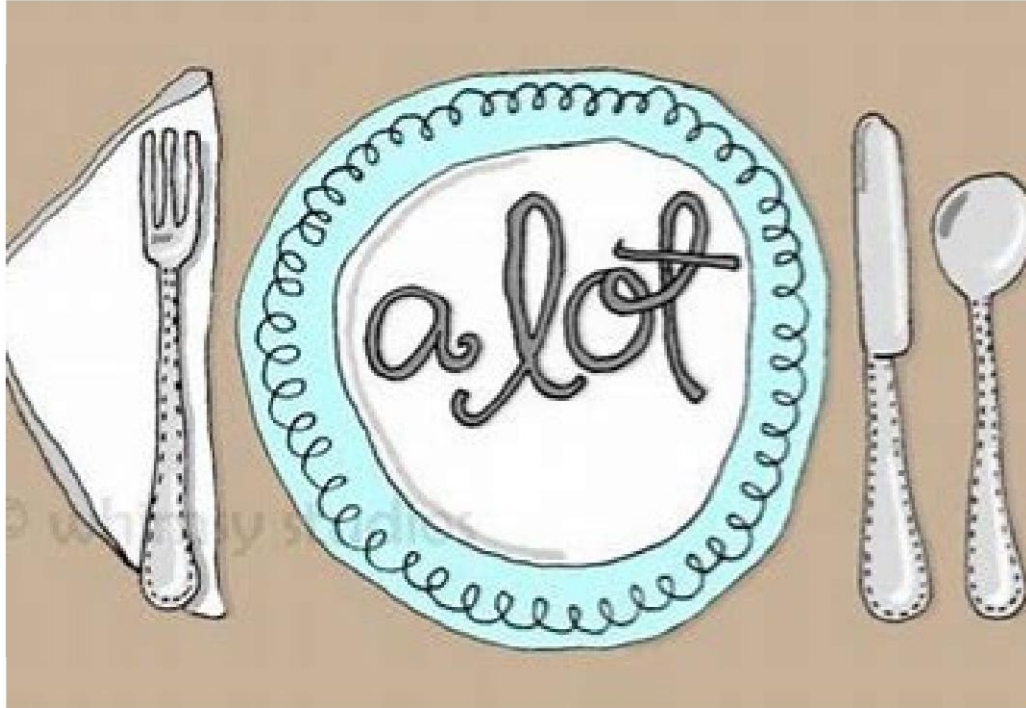


I just wanted to let you know, the Customer was so grateful for her new CAP plan, she had to pull over to the side of the road because she started crying. You made her very happy and she wanted me to thank you again.

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

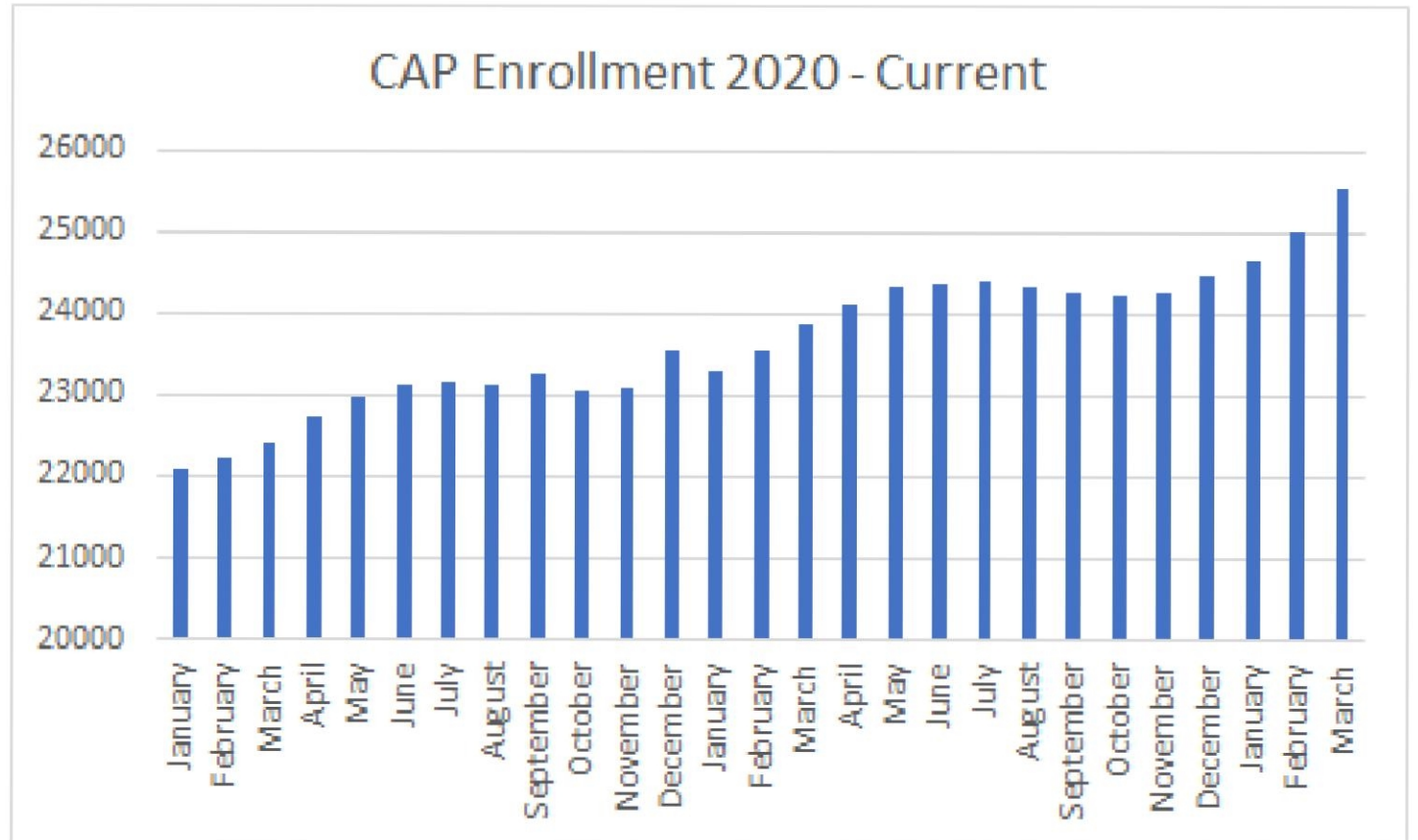
LIHEAP/CRISIS Update

Outreach Update

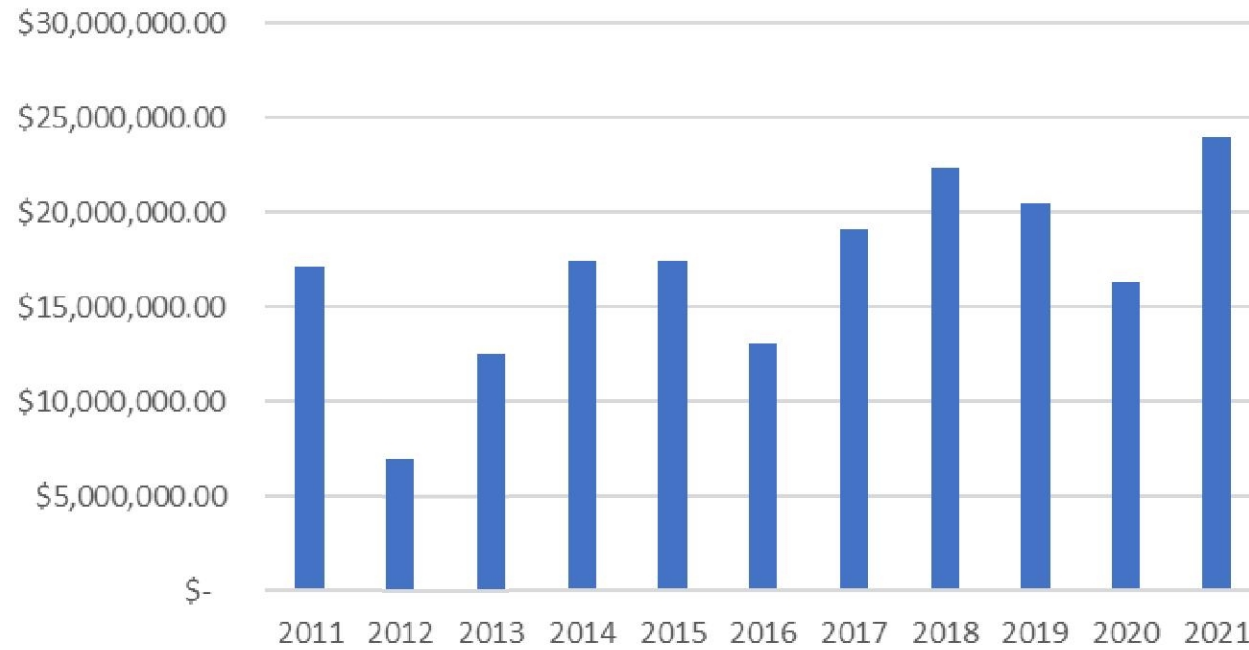
Health & Safety Pilot Update

Roundtable

Current Statistics – CAP Enrollment



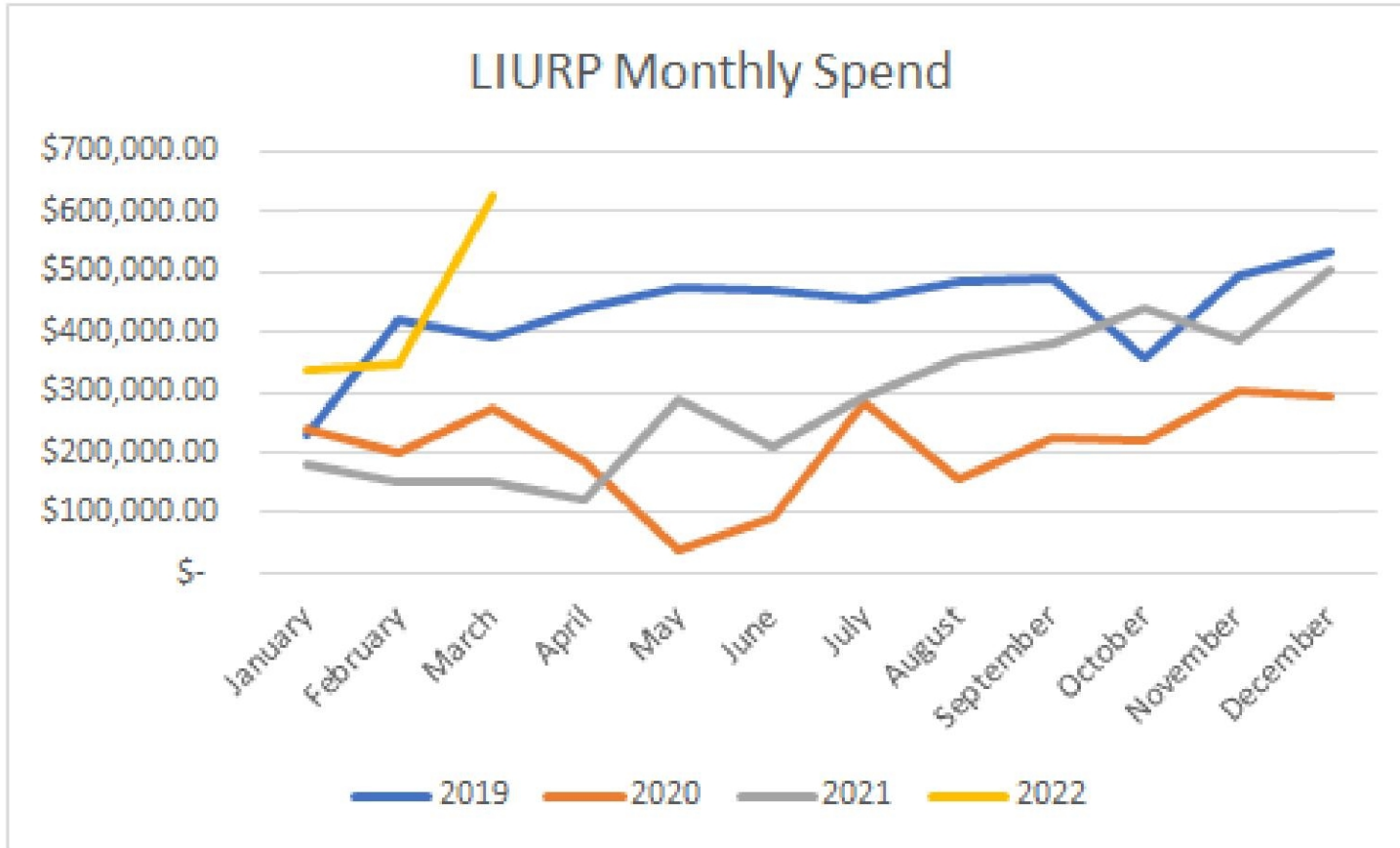
CAP Rider Annual Cost

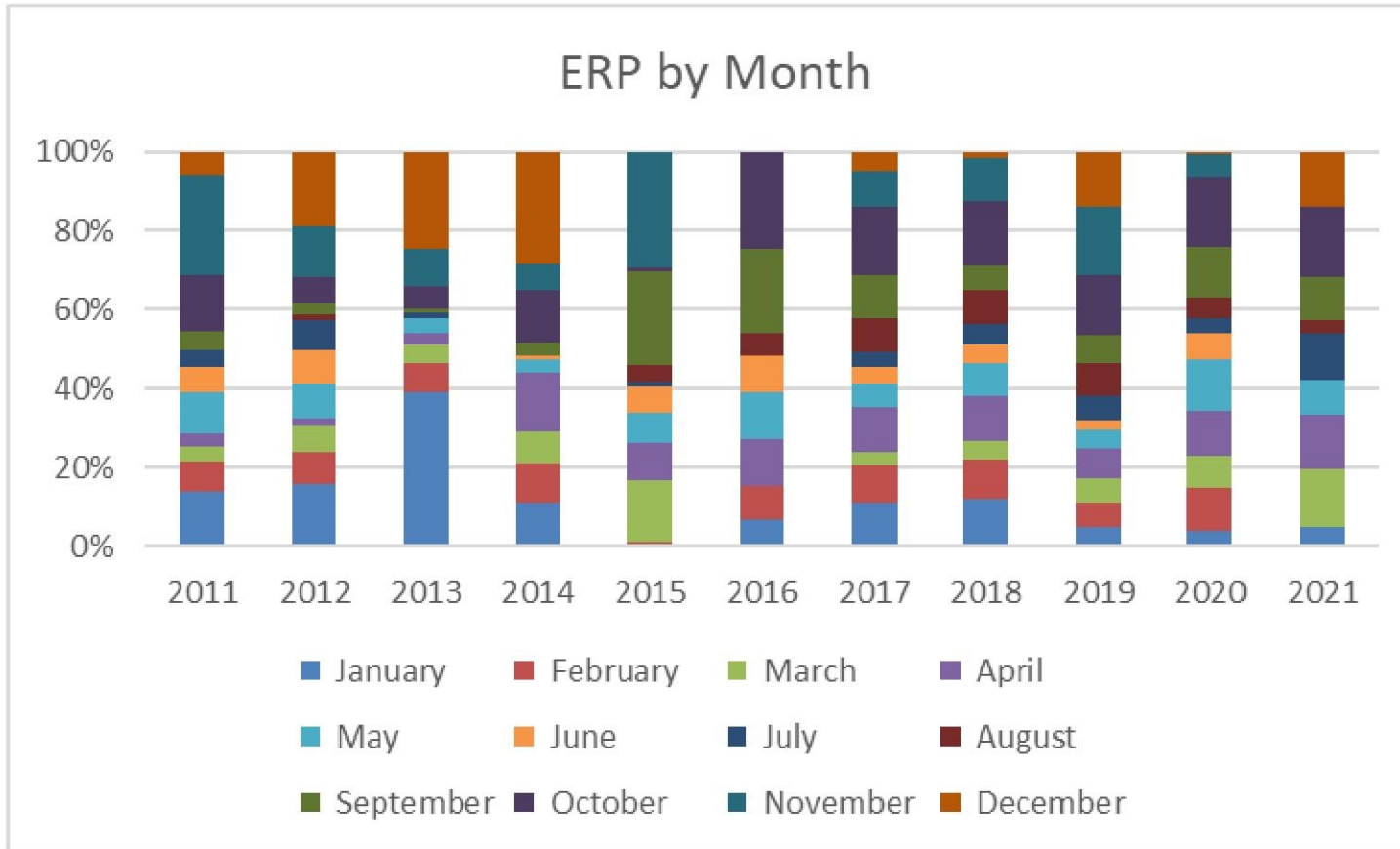


Current Statistics – CAP Costs

Current Statistics - LIURP

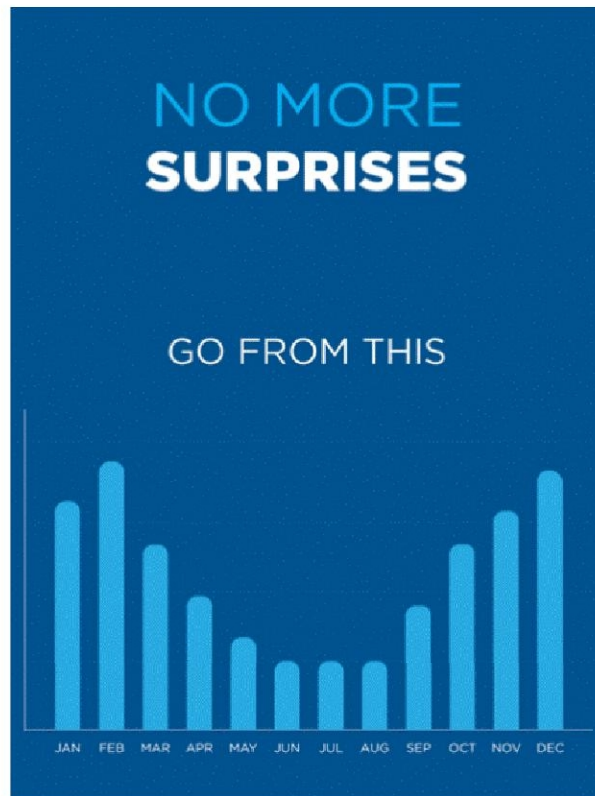
Monthly Spend





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

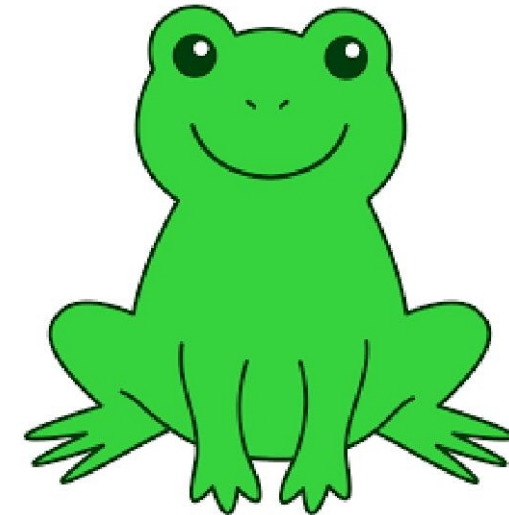
Comparison: 120% increase in funds (less than a 1% increase in participation)

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?

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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

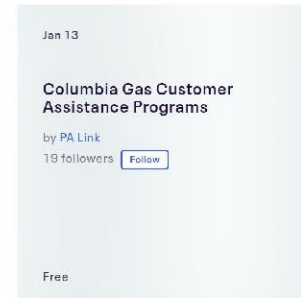
Early Interventions

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:

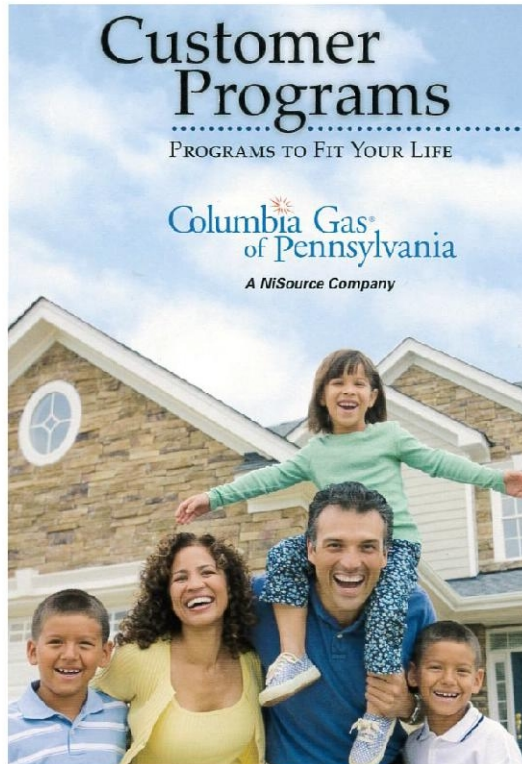
Washington
County Local
Housing Options
Team

Fayette County
Human Service
Council

Housing and
Homeless
Association Beaver

York County
Hispanic Coalition

Information/ Brochure Distributions



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

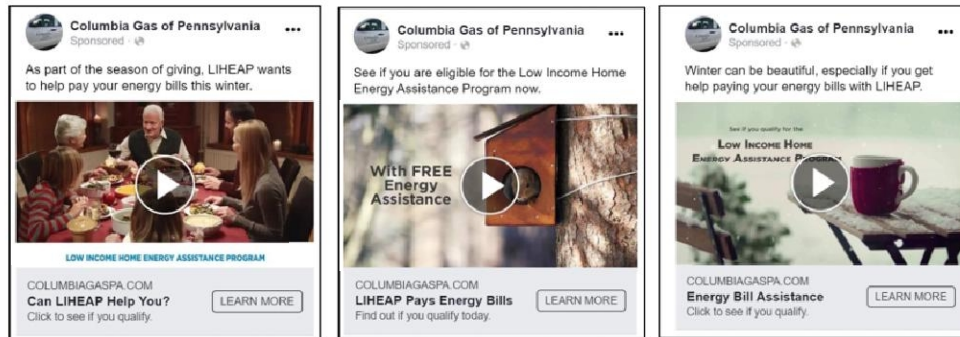
Campaign Performance (November 2021 and February 2022)

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.





ENERGY ASSISTANCE IS AVAILABLE

WE'RE HERE FOR **YOU**

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

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[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



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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?

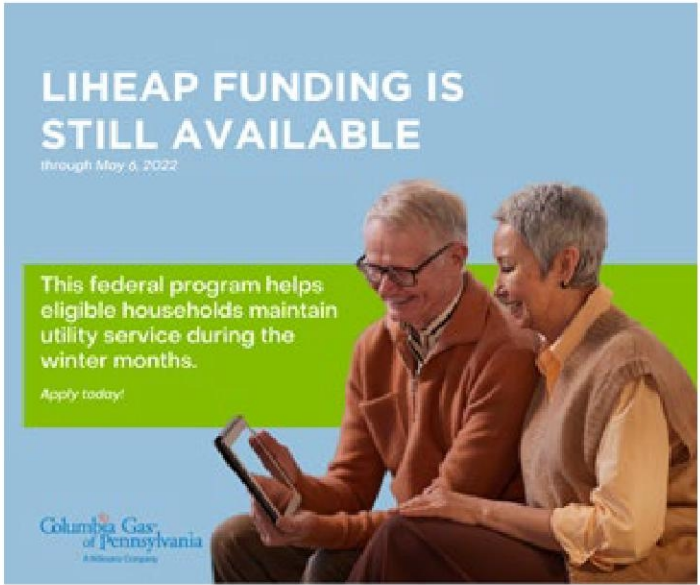
The Pennsylvania Housing Finance Agency (PHFA) is currently accepting applications for the Pennsylvania Homeowner Assistance Fund (PAHAF).

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

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

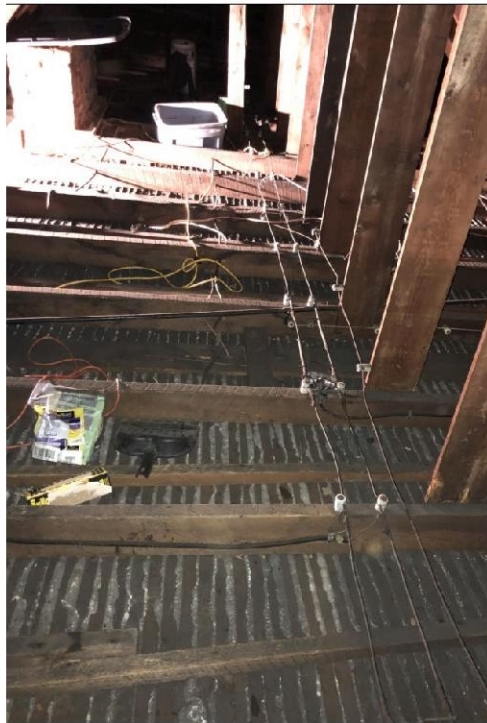
- ❖ Outcome from prior Advisory Council Meeting

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

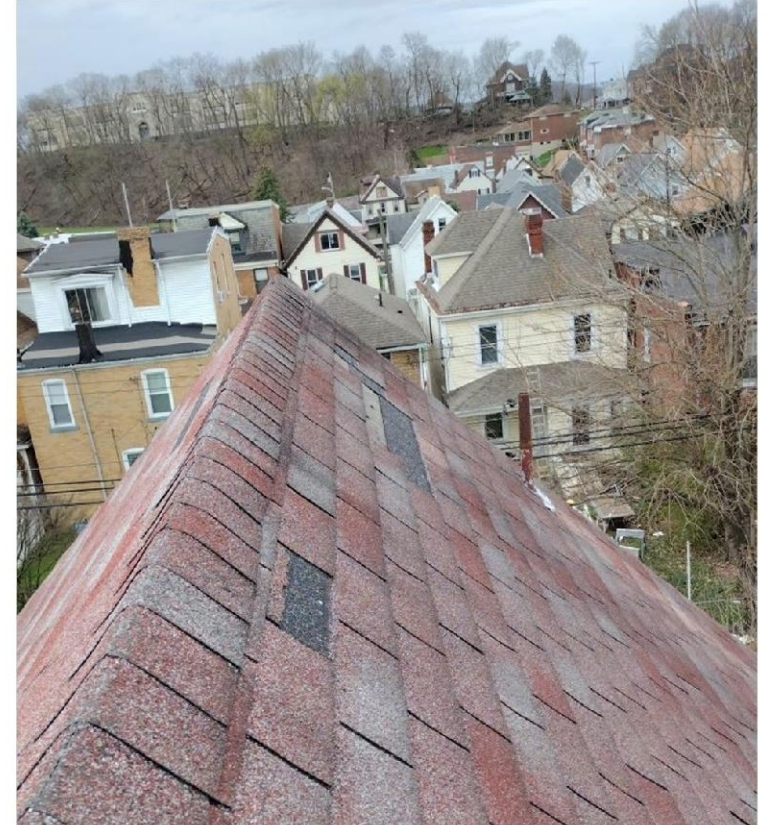


Health & Safety Customer

- 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!
