

National Fuel

Carl M. Carlotti
President

November 20, 2018

VIA First Class Mail

The Honorable Gladys M. Brown, Chairman
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: The Pennsylvania Public Utility Commission's
2018 "Prepare Now" Campaign**

Dear Chairman Brown:

Thank you for your November 6, 2018 letter stressing the importance of the Pennsylvania Public Utility Commission's (the "Commission") "Prepare Now" campaign. As stated in your letter, many utility consumers may not be familiar with the programs available to help them maintain or restore utility service or may be facing new circumstances that create a need for those programs where none existed previously. Educating consumers about the availability of low-income programs, increasing awareness of ways to reduce heating costs, educating consumers on conservation, encouraging consumers to check utility bills and supplier contracts and informing consumers about PAPowerSwitch.com and PAGasSwitch.com are all imperative. As a natural gas utility serving the coldest region of Pennsylvania, National Fuel Gas Distribution Corporation ("National Fuel") expends significant effort in educating customers regarding the availability of various assistance programs, conservation, and related matters.

Specifically, and in response to the numbered items in your letter, National Fuel has or will undertake the following actions for the 2018-2019 heating season:

1. National Fuel takes every opportunity to link customers to available assistance programs, including National Fuel's Customer Assistance Program ("CAP"), LIHEAP, CRISIS and Neighbor for Neighbor hardship funds by educating them about the programs and assisting them to access and retain these benefits.

For example, National Fuel hosted three outreach events this year. We held two meetings in Warren directed at educating agencies, legislators, and community leaders. Additional outreach was completed at Stairways a behavioral health agency in Erie County. Additionally, we partnered with First Energy and the PUC for the second annual "Be Winter Wise" event. This program allowed for outreach to agencies and legislative representatives in Erie, Crawford, Venango, and Warren Counties.

Approximately 70 participants from various agencies attended this full day event to learn about Universal Service Programs and other pertinent and helpful programs. Comments and evaluations indicated that the participants thought it was a valuable event. Additionally, National Fuel participates in senior and legislative expositions throughout the year to inform consumers about available Universal Service Programs and benefits they could provide. Refresher training for National Fuel field staff was completed to identify “vulnerable” and special needs customers to better assist them.

2. National Fuel’s CAP continues to have no limit on customer enrollment and, as such, we make every effort to discuss CAP when customers call to make payment arrangements. This includes those low-income customers facing termination. National Fuel believes its CAP is one of the best in the state and is always looking for eligible customers to enroll.
3. It has been, and will continue to be, our practice to restore service to any low-income customers enrolling in our CAP for the first time.
4. National Fuel strives to reach solutions that provide support for customers in need. National Fuel evaluates customers’ circumstances to find the program or solution that will best fit their needs. Where a payment arrangement is appropriate, National Fuel will continue to consider the application of LIHEAP, CRISIS, and Neighbor for Neighbor grants when establishing a payment arrangement.
5. National Fuel believes strongly in its current generous donations to a wide-variety of nonprofit organizations, including the Neighbor for Neighbor Heat Fund. National Fuel monitors its charitable contributions and evaluates any increased need.
6. We will continue to aggressively promote our Neighbor for Neighbor Heat Fund. In fact, National Fuel has temporarily expanded eligibility for this fund to ensure more people have an opportunity to benefit. All customers, regardless of the method of payment, are able to make contributions to this fund. The monies from this program are available to our older, disabled and veteran customers experiencing a difficult situation, customers who fall within the 150 percent to 200 percent poverty level, as well as those receiving unemployment assistance.
7. In customary cold weather periods, we view termination of low-income customers as a last resort and make every attempt to allow customers who are making a good faith effort to pay their bill to keep utility service. The availability of various hardship funds and Universal Service programs provides customers who are experiencing difficulties a great opportunity to avoid termination and receive assistance.
8. National Fuel will continue its practices of: (1) waiving security deposits for low-income customers; and (2) where appropriate, adding a

reconnection fee to a customer's bill rather than making it a condition of restoring service.

9. We will accept any appropriate combination of LIHEAP, CRISIS and Neighbor for Neighbor funds to turn on or reconnect service. If these funds are insufficient and a customer payment is also required, we will be reasonably lenient considering all appropriate circumstances. Customers may also be reconnected and referred to National Fuel's CAP if the customer is eligible.
10. National Fuel annually provides numerous bill inserts to all customers containing information regarding natural gas safety. Additionally, in November we issue a winter safety news release regarding the dangers of carbon monoxide and other safety issues. Further, National Fuel's Low Income Usage Reduction Program ("LIURP") includes a component for furnace replacement or repair where appropriate. National Fuel representatives will continue to make referrals to other agencies for repair/replacement services as needed.
11. We have and will continue to vigorously promote the use of our budget billing and third party notice programs which have always allowed for year-round enrollment. As in previous years, we will promote the 3rd party notice option to the Area Agency on Aging within our service territory.
12. National Fuel provides information on all programs and services through use of paid media campaigns in multiple formats designed to reach all audiences. National Fuel has multiple resources available to help customers understand their consumption and also ways to manage it. National Fuel continues to promote LIURP and assists customers in obtaining information on the program. The Company also coordinates benefits among other providers.

Again, thank you for the Commission's efforts in educating all Pennsylvanians on how to best prepare for winter energy costs. If you need any additional information please feel free to contact me.

Very truly yours,



Carl M. Carlotti
President, National Fuel Gas
Distribution Corporation

cc: Vice Chairman Andrew G. Place
Commissioner John F. Coleman, Jr.
Commissioner David W. Sweet
Commissioner Norman J. Kennard