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September 13, 2013

Via Electronic Mail

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P. O. Box 3265
Harrisburg, PA 17105-3265

Re: Docket No. M-2012-2308007
Equitable Gas Company, LLC
Further Revised Universal Service and Energy Conservation Plan 2013 - 2016

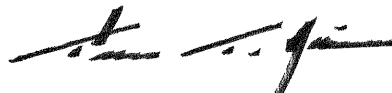
Dear Secretary Chiavetta:

We are counsel to Equitable Gas Company, LLC in the above matter and are enclosing for filing its Further Revised Universal Service and Energy Conservation Plan 2013-2016 as required by Ordering Paragraph No. 2 of the Final Order of the Public Utility Commission entered August 29, 2013. Please contact me with any questions concerning this matter.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By



Thomas T. Niesen

Encl.

cc: Certificate of Service (w/encl.)
Sandra L. Gagorik (w/encl.)
David W. Gray, Esquire (w/encl.)

130913-Chiavetta (Further Revised Plan Filing).wpd

CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of September 2013 served a true and correct copy of the foregoing letter and Equitable Gas Company's Further Revised Universal Service and Energy Conservation Plan 2013-2016, upon the persons and in the manner set forth below:

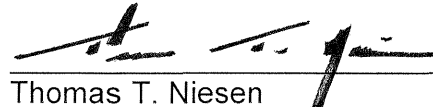
BY FIRST CLASS MAIL, POSTAGE PREPAID

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Harrisburg, PA 17101

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Equitable Gas Company

Universal Service and Energy Conservation Plan

2013 - 2016

**Submitted June 1, 2012
Revised September 13, 2013**

**Sandra L. Gagorik, Manager
Universal Service & Community Outreach**

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Equitable Gas Company Universal Service and Energy Conservation Plan _____

Plan Submission

Equitable Gas Company, LLC (“Equitable” or “Company”) submits this Universal Service and Energy Conservation Plan for 2013 – 2016, Revised September 13, 2013, (“Universal Service Plan” or “Plan”) to the Pennsylvania Public Utility Commission (“Commission” or “PUC”). The Plan is submitted in compliance with the Final Order of the Commission entered August 29, 2013 at Docket No. M-2012-2308007 (“Final Order”).

Plan Modifications Consistent with Final Order

The Final Order directed Equitable to submit a further revised Plan reflecting changes consistent with the Final Order.¹ Consistent with the Final Order, the following Plan modifications are incorporated herein:

General

- The next triennial Universal Service & Energy Conservation Plan filing is due on or before June 1, 2016 for 2017 – 2019.

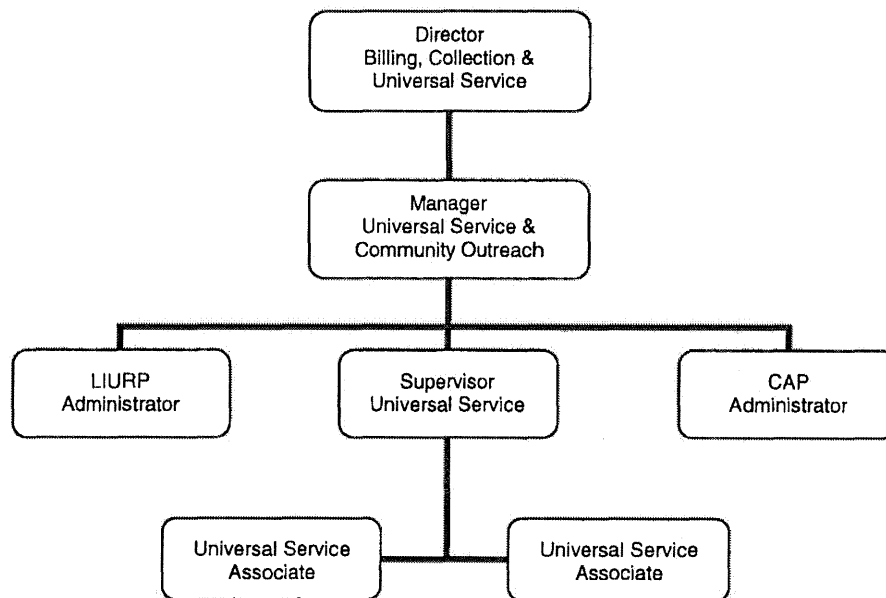
CAP

- The CAP percent of payment for the 51%-100% and 101%-150% of poverty groups is changed from 10% and 11.5%, respectively, to 9% and 10%, respectively. The percent of payment for the 0%-50% group remains at 8% together with the \$39 minimum payment.

¹ Equitable submitted its Plan for 2013 – 2015 to the Commission on June 1, 2012. Thereafter, in response to the Commission’s Tentative Order entered May 9, 2013, Equitable submitted a revised Plan for 2013-2016.

- The arrearage forgiveness component is revised from a three-to-one match on the customer's CAP \$5 imbedded co-payment to a forgiveness of 1/36th of the pre-program balance. This revision will be implemented on or before September 1, 2014.
- In those situations where the CAP budget exceeds the most advantageous Budget Plus 1/60th plan, Equitable will explain the advantages and consequences of the Budget Plus and CAP and permit CAP enrollment if the customer chooses the higher payment plan. This criterion will be implemented as soon as training can be completed.

Organization Structure



Community Based Organizations

The staff of Universal Service networks with over 60 community agencies and social service organizations throughout the Company's service territory. These associations permit both the Company and agencies to assist with programs and services that will best meet the needs of low-income customers. This interaction results in the customer's enrollment into the Company's programs, application and approval of LIHEAP, Crisis and Fuel Fund assistance, housing equipment/structure repair or replacement, and financial assistance.

During the last three years (2009-2011), Equitable has received more than \$373,000 on behalf of its customers in need from community agencies and social service organizations. The following is a brief list of some of the agencies and organizations who work closely with Equitable on behalf of their clients and Equitable's customers:

Action Housing HPRP	Multiple Sclerosis Society
Allegheny County Health Department	North Hills Community Outreach
Allegheny Valley Association of Churches	Northern Area Multi-Service Center
Catholic Charities	Rankin Christian Center
Community Action Southwest	Rebuilding Pittsburgh Together
Community Human Services	Senior Care Center
East Liberty Presbyterian Church	St. Vincent DePaul Society
Holy Family Institute	Salvation Army
Integrated Social Services	Touching Families
Jewish Family & Children Services	Tri-Valley Energy Center
Kelly Anne Dolan Memorial Fund	Urban League
McKeesport Housing Corporation	Veterans Leadership Organization
Mount Ararat Baptist	

The Universal Service staff also participates in awareness programs, fairs and meetings sponsored by social service agencies and elected officials. The staff actively participates on community committees such as:

- Be Utility Wise Committee
- Air Conditioning Contractors of America (ACCA) Project
- CARES Network
- Rebuilding Together Pittsburgh Board of Directors
- Energy Association of Pennsylvania Consumer Services Committee
- Partners for Warmth LIHEAP Committee (Columbia, Equitable, Peoples and Peoples TWP)
- Service Providers Group (social service agencies and service providers)

Equitable will continue to work closely with community agencies and organizations within our service territory as part of the 2013-2016 Plan.

Universal Service Programs

Pursuant to 52 Pa. Code §62.4(b), the following is a description of the components of Equitable's Universal Service and Energy Conservation Plan.

Customer Assistance Program (CAP)

Program Description

Equitable's CAP is an account management program for low-income customers at or below 150 percent of the federal poverty level. Eligible customers are placed on an affordable budget based on a percentage of the customer's gross household income. CAP credits offset the difference between the usage and the CAP budget while arrearage forgiveness credits eliminate pre-CAP balances over an average of four years.

CAP provides an affordable payment plan designed to limit the risk of constant collection activity and disruption of utility service for low-income customers. Program costs are recovered from Equitable's residential non-CAP customers.

Program Components

Eligibility Criteria

Customers qualify for CAP under the following guidelines:

- Total gross household income is at or below 150 percent of the federal poverty level
- The account is designated as residential heating
- The customer resides at the service address
- The account is a single dwelling unit
- There is only one account in the customer's name

- The CAP budget is less than the Base Budget for the property or less than the maximum Budget Plus plan as defined at 66 Pa. Code §1405(b)(1)
- The customer is not permitted to contract with a separate gas supplier

Percent of Income Payment

The CAP budget amount is based on the poverty level of the household as follows:

Household Percent of Income	Percent of Income Payment
0% - 50%	8%
51% - 100%	9%
101% - 150%	10%
The minimum CAP budget is \$39	

If the CAP budget exceeds the Base Budget for the property, the customer will be ineligible for CAP except under the following conditions.

- If the customer's arrearage divided by 60 months and added to the Base Budget would be greater than the proposed CAP budget, the customer will be eligible to participate in CAP. In accordance with 66 Pa. Code §1405(b)(1), a 60-month payment plan is the maximum period permitted for households with incomes not exceeding 150 percent of the federal poverty level. Therefore, if the CAP budget would be less than a Budget Plus $1/60^{\text{th}}$ of the balance, the CAP budget would be the best option. For example:

Customer balance	\$900
Base Budget	\$90
CAP Budget	\$100
Budget + $1/60^{\text{th}}$ of balance ($\$900 \div 60 \text{ mos.} = \$15 + \$90$)	\$105

- In those situations where the CAP budget exceeds the Budget Plus $1/60^{\text{th}}$ plan, the Company will explain the advantages and consequences of Budget Plus and CAP and permit CAP enrollment if the customer chooses to pay more per month to

reduce the arrearage more quickly or have other benefits of CAP enrollment. This criterion will be implemented as soon as training can be completed.

Arrearage Forgiveness

Embedded in the affordable CAP payment is a \$5 co-payment that is applied to the customer's pre-CAP balance. This amount is applied to the customer's pre-program arrearage and is matched on a three-to-one basis as long as the customer is up to date with their CAP payment. In this way, the pre-program balance is reduced by \$20 monthly and, on average, will eliminate their pre-program balance in four years. A delinquent CAP customer, who brings the account up to date, will receive all accumulated forgiveness credits.

Beginning on or before September 1, 2014, the arrearage forgiveness amount will be based on 1/36th of the pre-program arrearage. The \$5 co-payment will be eliminated but will not change the CAP budget as the co-payment was imbedded in the CAP budget. Application of the arrearage forgiveness credit will continue to be based on timely payment of the CAP amount. A delinquent CAP customer, who brings the account up to date, will receive all accumulated forgiveness credits.

Outreach and Intake

Customers who qualify for CAP are enrolled by the Company's Call Center personnel through a one-call process. This process eliminates a referral to another telephone number, providing income information a second time and any confusion related to the plan established by Equitable and the subsequent enrollment in CAP. When the enrollment is completed, a CAP enrollment confirmation letter is sent to the customer reiterating the CAP rules. CAP enrollments may also be completed by Tri-Valley Energy Center, a community agency under contract with Equitable, while other agencies will refer potential CAP participants to our Call Center.

Recertification

Equitable will continue to recertify the household income for a minimum of 10 percent of its active CAP customers to ensure continued eligibility. The Company will exclude customers who have received a LIHEAP and/or Crisis grant during the current program year from recertification. Selection of other participants will be based on, but not limited to, the following categories:

- LIHEAP eligible but did not apply/receive
- Most recent income update greater than four years old
- Income Source:
 - Self-employed
 - Unemployment compensation
 - No income
 - Minimum payment CAP budget
- Other randomly selected customers

Consumption Monitoring

Maintaining or reducing usage is an important component of CAP. Equitable's high bill audit process provides a consistent and timely consumption monitoring.

In the high-bill audit process, when a meter reading exceeds established parameters, the account is reviewed including, when necessary, an onsite visit, to determine a reason for the high usage. If the investigation indicates the increased usage was the result of consumer negligence and the customer is on CAP, the account is referred to the CAP Administrator. The customer is contacted and advised that they may be removed from CAP or required to pay for the amount of the excess usage if appropriate measures are not taken to reduce usage to historic levels. The account continues to be monitored until the issue is resolved.

Default Provisions

CAP customers who fail to comply with one or more of the following may be removed from the program:

- Failure to make monthly CAP payments resulting in termination. Shut off notices will be issued for CAP customers who are delinquent by more than one payment.
- Failure to report changes in income or family size.
- Failure to recertify income eligibility when requested by Equitable.
- Failure to practice energy conservation or maintain historical usage patterns adjusted for weather.
- Refusal to accept weatherization services if/when offered by the Company.

Customers removed for default reasons, other than non-pay default discussed in the following section, is required to resolve the reason for default to be reinstated in CAP. In addition, the customer is required to pay the equivalent of all missed CAP payments while service was retained. All payments made by the customer after removal from CAP are deducted from the amount required for reentry into CAP.

Non-Pay Default

When customers become delinquent, a reminder call is attempted to encourage the customer to bring the account up to date. Termination proceedings may be initiated for those who remain more than one payment delinquent. In many instances, the threat of termination prompts the customer to make catch-up payments and prevents removal from the program. However, if the customer does not pay the overdue CAP amount, service will be terminated.

Reconnection amounts for those customers who are terminated and removed from CAP are as follows:

- First Removal:
 - CAP catch-up amount and a reconnection fee.
- Two or More Removals:
 - If a customer has been terminated and removed from CAP two or more times, the customer may be required to pay the full balance and reconnection fee.

Non-Default Provisions

Customers may be removed from CAP for reasons other than default including, but not limited to, the following:

- Customer request
- Over income—~~income~~ exceeds program limits of 150 percent of federal poverty level
- CAP payment exceeds Base Budget for the property or the maximum Budget Plus plan as defined as defined at 66 Pa. Code §1405(b)(1) unless the customer **chooses** to pay the higher amount.
- Customer moved from Equitable's service territory

Reinstated Within Twelve Months of Removal

Customers who request to be reinstated in CAP will be required to pay the equivalent of all missed CAP payments while service with Equitable was retained. All payments made by the customer after removal from CAP will be deducted from the amount required for reentry into CAP.

Appeal Process

If a CAP applicant or participant is not satisfied with the Company's position on any provision of CAP, the Company will follow the dispute procedures at 52 Pa. Code §§56.151 and 56.152. The CAP applicant or participant may also file an informal complaint with the PUC in accordance with 52 Pa. Code §56.162.

Application of Grants

Equitable complies with the Department of Public Welfare's (DPW) requirement that LIHEAP cash grants be applied to the "Asked to Pay" amount for customers participating in a utility CAP. When the amount of the grant exceeds the "Asked to Pay" amount, the remaining grant is applied to future CAP amounts until the grant is exhausted. If there is any unused portion of the LIHEAP grant at the end of June of the year following the "State fiscal year in which payment was authorized," the remaining grant will be returned to DPW's Controller's Office as outlined in §601.46 of LIHEAP State Plan.² The Equitable bill will identify the amount of the LIHEAP grant received, the portion applied to the customer's account and the amount remaining for future bills.

If the customer receives a Crisis grant, the amount of the grant will be applied to the customer's amount due (CAP budget) consistent with DPW guidelines. If the customer's gas service is off, the Crisis grant may be used to offset the amount needed for turn on, i.e. the CAP catch-up amount.

Customers whose gas service is off may apply for a Hardship (Fuel) Fund grant to be used in whole or in part to cover the CAP catch-up amount needed to have service restored.

² Commonwealth of Pennsylvania, Low-Income Home Energy Assistance Program, Fiscal Year 2011, Final State Plan, page B-10.

CAP Needs Assessment

Consistent with the Bureau of Consumer Services' document to the Energy Association of Pennsylvania, dated May 24, 2001, Equitable based the needs assessment on the following criteria:

1. The number of identified low-income customers.

Equitable used the data submitted in the most recent Universal Service Reporting Requirements to identify low-income customers:

Month	Low Income -		Total
	CAP	Non CAP	
Jan-12	14,854	29,541	44,395
Feb-12	14,640	29,742	44,382
Mar-12	14,534	29,791	44,325
Apr-12	14,199	29,791	43,990
May-12	13,596	29,817	43,413
Jun-12	13,145	29,835	42,980
Jul-12	12,778	29,880	42,658
Aug-12	12,472	29,885	42,357
Sep-12	12,179	30,141	42,320
Oct-12	11,848	30,692	42,540
Nov-12	11,682	31,322	43,004
Dec-12	11,534	31,664	43,198
Average	13,122	30,175	43,297

2. An estimate of low-income customers.

To estimate the number of low-income customers in Equitable's service territory, the Company relied on Census data:

County	Census Total Households*	EGC		Census Low Income	% Census Low Income	Estimated Low Income Based on Census
		Residential Customers	% EGC Customers			
Allegheny	520,035	212,912	40.9%	131,203	25.23%	53,717
Armstrong	29,200	2,578	8.8%	7,367	25.23%	650
Butler	71,389	2,002	2.8%	13,515	18.93%	379
Clarion	15,731	219	1.4%	4,846	30.81%	67
Fayette	58,263	24	0.0%	21,945	37.67%	9
Greene	14,173	4,377	30.9%	4,696	33.13%	1,450
Indiana	34,625	62	0.2%	12,398	35.81%	22
Jefferson	18,475	43	0.2%	5,567	30.13%	13
Washington	82,702	13,905	16.8%	17,684	21.38%	2,973
Westmoreland	151,287	6,858	4.5%	33,520	22.16%	1,520
Total	995,880	242,980	24.40%	252,743	25.38%	60,801

*Based on 2008 Census

3. The number of identified payment troubled, low-income customers (this is a subset of Number 1).

Equitable Gas used the data submitted in the most recent Universal Service Reporting Requirements (USRR) to identify delinquent payment troubled, low-income customers:

Average low income, non-CAP customers on a payment arrangement (No. 7A)	4,259
Average low-income customers not on a payment arrangement (No. 7B)	3,240
Total	7,499
Percent of customers who fail payment arrangements*	X 48.6%
Number of identified low-income, payment-troubled customers	3,642

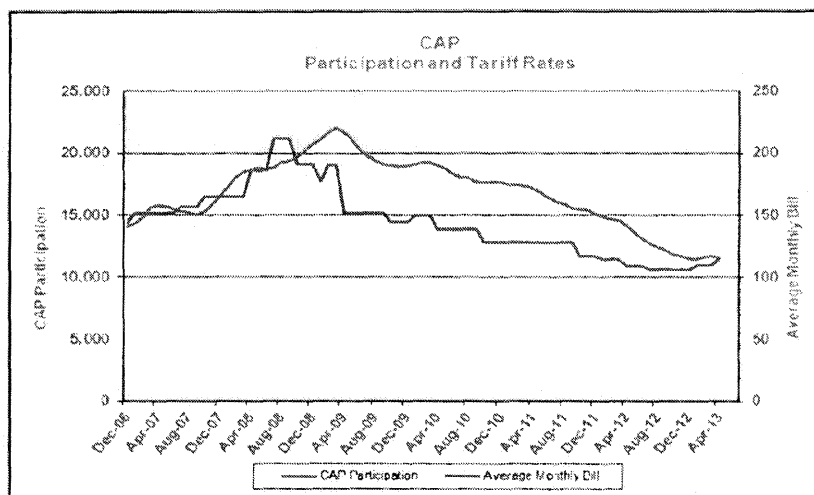
*No. 2 shows there were 4,097 successful payment arrangements out of 7,966 low-income customers. The number unsuccessful is then 3,869 or 48.6%

Projected Enrollment Level

Based on the Needs Assessment, the maximum enrollment would be 16,764 as shown below.

Twelve-month average CAP participation (Needs assessment No. 1)	13,122
Identified payment troubled, low-income customers (Needs assessment No. 3)	3,642
Total	16,764

Equitable's CAP has remained open to new enrollments and both the Company and Call Center personnel encourage all eligible customers to participate in CAP. As of the end of April 2012, there were 14,199 customers participating in CAP. Since the filing of the 2010-2012 Universal Service and Energy Conservation Plan on June 1, 2009, Equitable's natural gas rates have decreased 31.0 percent. Equitable has seen a similar decrease in CAP participation during this time period.



The winter heating seasons have been warmer than normal, especially the 2011-2012 season which was 18 percent warmer than normal through April 2012. Based on current rates and milder winters, Equitable anticipates CAP participation to remain in the 11,000 to 16,000 range. The program does not have a participation limit and, as previously stated, Equitable encourages CAP participation when it is the most beneficial plan for the household.

Other reasons for projected enrollment being lower than the number of identified low-income customers include:

- Low-income customers living in smaller residences where the cost of natural gas is within their financial limits.
- The CAP budget, based on household income, exceeds the Base Budget or Budget Plus 1/60th of the balance.

CAP Program Budget

Budget	Administrative Costs	CAP Credits	Arrearage Forgiveness
2013	\$565,000	\$7,800,000	\$420,000
2014	\$565,000	\$7,800,000	\$415,000
2015	\$565,000	\$7,800,000	\$410,000
2016	\$565,000	\$7,800,000	\$400,000

Low Income Usage Reduction Program (LIURP)

Program Description

Equitable's Low Income Usage Reduction Program (LIURP) assists eligible low-income customers in reducing energy bills through the installation of various energy conservation measures such as attic and sidewall insulation, heating equipment repair or replacement, etc. LIURP improves the health, safety and comfort levels of customers' homes.

Eligibility Criteria

Customers qualify for LIURP under the following guidelines:

- Total gross household income at or below 150 percent of the federal poverty level.
 - Up to 20 percent of the annual program budget may be spent on Special Needs customers with total gross household incomes between 150 percent and 200 percent of the federal poverty level
- Highest usage exceeding 160 Mcf
- Residential, single dwelling heating account
- The customer resides at the service address
- Only one account in the customer's name
- Customer is homeowner or renter
 - Landlord permission must be obtained in writing for renters

Priority of Services

CAP customers pay a budget based on a percentage of total household income. The difference between the CAP budget and the cost of the actual usage is identified as the billing deficiency and is subsidized by non-CAP residential customers. To reduce the burden on Equitable's non-CAP customers, high usage CAP customers receive priority of LIURP services.

LIURP services will be prioritized as follows:

- High usage CAP customers in excess of 160 Mcf per year and/or billing deficiencies exceeding \$50 per month
- Non-CAP customers with high usage in excess of 160 Mcf per year and arrearages exceeding \$750.
- High usage non-CAP special needs customers with gross household incomes between 150 percent and 200 percent of the federal poverty level with arrearages exceeding \$750.

Outreach and Intake

Potential LIURP candidates are referred to the program from a variety of internal and external sources including:

- Equitable's High Usage CAP report
- Call Center, Collections and Universal Service representatives
- Inter-Utility (Duquesne Light)³
- Equitable's website
- Community agencies

Home Weatherization

Prior to weatherizing a home, a heating contractor completes a safety check of the home to ensure safe operation and maintenance of external/internal gas piping, gas water heater, furnace and other gas appliances.

An independent auditor with experience in residential conservation and weatherization inspects the customer's home for:

- Air infiltration where heat is escaping and cool air is entering the home
- Effectiveness of previously installed weatherization measures

³ Duquesne Light's Smart Comfort program identifies shared customers with Equitable. Audit costs are split between companies, which assists in reducing costs of the program.

The auditor then evaluates which measures will be most beneficial for the customer's home. Measures are installed based on established payback criteria outlined in 52 Pa. Code §58.11, which may include:

- Attic and sidewall insulation
- Window and door caulking, sealing and weather stripping
- Gas piping and heating system repairs and/or replacements
- Minor repairs as necessary

Energy Education

At the time of the audit, the auditor also explains the weatherization program in more detail. The customer's consumption patterns are reviewed and behavior changes are recommended to reduce usage. If the customer has had an unusually high increase in consumption, a follow-up telephone call or visit may be scheduled one year after weatherization. This follow up identifies reasons for the increased usage and recommends possible solutions.

LIURP Needs Assessment

The following chart provides an estimate of the number of customers who meet LIURP eligibility criteria.

LIURP Needs Assessment	>160 Mcf
Residential customers	241,389
Low-income customers	43,297
Customers meeting usage requirements	4,804
Previously weatherized	(854)
Subtotal	3,950
Owners	1,977
Renters	1,973
Assume 50% success rate for renters	(987)
Potential LIURP	2,964
Average \$4,929 w/o administrative costs	\$14,607,092

Not all potential LIURP customers will qualify to have their homes weatherized. Unsound housing structures, landlord refusals to permit weatherization and unsafe heating equipment are some of the reasons that homes are placed on hold or rejected for LIURP services.

LIURP Program Budget

Year	Projected No. of Homes	
	Weatherized	Budget
2013	123	\$698,139
2014	123	\$698,139
2015	123	\$698,139
2016	123	\$698,139

Since the inception of LIURP in 1988, Equitable has spent more than \$14.4 million to weatherize over 3,400 homes. The average usage reduction since inception of the program is 24.2 percent.

Customer Assistance Referral and Evaluation Services (CARES)

Program Description

The Customer Assistance Referral and Evaluation Services (CARES) program is designed to provide comprehensive services to low-income, elderly, handicapped and special needs customers with bill-payment and energy-related problems. Equitable, with the assistance of a network of community agencies, helps these customers in obtaining available energy assistance such as LIHEAP, Crisis and Hardship (Fuel) Fund and makes referrals to other programs or agencies for other services such as Equitable's CAP, public assistance, food stamps, SSI, Medicaid, etc. Customers whose service has been interrupted due to leakage of external or internal gas piping or malfunctioning heating equipment are assisted with obtaining repairs through Equitable's Hardship Repair Fund, while funding exists, or referred to other funding agencies, plumbers and heating contractors.

Eligibility Criteria

Service Emergency Repairs	Elderly, handicapped or low-income customers whose service has been temporarily interrupted due to external or internal gas piping or malfunctioning heating equipment.
Special Needs/Extenuating Circumstances	Elderly, handicapped or low-income, payment-troubled customers who have extenuating circumstances and are homebound or require special assistance or assessment.
	Elderly customers living alone (without non-elderly responsible adults) who are in imminent danger of service loss due to non-payment or non-access.
	Low-income customers whose service has been terminated and not reconnected through the contact attempts of the Cold Weather Survey.

Outreach and Intake

Identification and referral of elderly, handicapped or low-income, payment-troubled customers with special needs are made by the following:

- Call Center and Collection representatives
- Field service personnel
- Community and social service agencies

Other Program Services

Low Income Home Energy Assistance Program (LIHEAP)

Equitable provides information about the LIHEAP and Crisis programs and makes a special effort to inform customers who may qualify for assistance through bill inserts, website, special mailings, telephone calls, news conferences, and TV and radio announcements. The Company also has a special toll-free number that customers can call to determine eligibility or request an application.

For more than 20 years, Equitable has participated with Columbia Gas and Peoples Natural Gas companies along with former Steeler, Franco Harris, in a joint effort, now known as the Partners for Warmth, to provide awareness of LIHEAP and outreach to those who may qualify for assistance through LIHEAP. The Partners for Warmth have also participated in a Call for LIHEAP call-in program in conjunction with KDKA-TV, our local television network.

Hardship Repair Fund

Equitable established a Hardship Repair Fund in 1996 with funds remaining from the Gulf-Tetco settlement to assist low-income and elderly customers without service due to house or service gas line leakage or malfunctioning heating equipment. The program assists both homeowners and renters, with leases making them responsible for repairs,

who meet the income eligible guidelines. The income limits include households with gross incomes at or below 150 percent of the federal poverty level. Ten percent of the annual program funds can be used for special needs households with incomes between 151 percent and 170 percent of the federal poverty level.

The Hardship Repair Fund is a fund of last resort with an annual budget capped at \$75,000. Although the Gulf-Tetco funds have been exhausted, the program is currently sustained through Company contributions made in settlement of recent Commission proceedings.

Thermostats for Visually Impaired

Equitable provides and installs furnace thermostats for visually-impaired customers free of charge. These digital thermostats are installed at the request of the customer and upon receipt of a doctor's confirmation of the impairment.

ACCA

Equitable annually participates with the Air Conditioning Contractors of America (ACCA) project is a volunteer program providing free furnace tune-ups and minor repairs.

CARES Needs Assessment

Due to the unpredictability of CARES customer referrals, Equitable uses its historical records to project customers requiring CARES services. The CARES budget includes assistance provided to customers in need, sponsorship of community agency or social service events, the Hardship Repair Fund and all activities associated with the Company's LIHEAP outreach efforts.

Year	CARES	Budget
2013	600	\$300,000
2014	600	\$300,000
2015	600	\$300,000
2016	600	\$300,000

Hardship (Fuel) Fund

Program Description

Since 1979, Equitable has participated in a Hardship (Fuel) Fund to assist low-income, payment-troubled customers. Its first program was administered by Goodwill Industries of Pittsburgh and remained in operation until late 1986 when Equitable joined the Dollar Energy Fund. Donations to the Hardship Fund program are comprised of customer and Equitable contributions. The Company contributes up to \$200,000 annually to match customer contributions. In addition, the Company compensates Dollar Energy Fund for administrative costs.

The Hardship Fund program will operate from October 1 of each year until funds are depleted.

Eligibility Criteria

Customers qualify for Hardship Fund assistance under the following guidelines:

- Total gross household income is at or below 200 percent of the federal poverty level.
- The account is designated as residential heating.
- The customer resides at the service address.
- The account is a single dwelling unit.
- The balance on the customer's account must be at least \$100.
- The customer must exhibit a sincere effort of payment on their energy bill by having paid a minimum of \$150 within the last 90 days (\$100 if the applicant is 62 years of age or older).
- The customer is without utility service or has a termination notice.
- The customer has not illegally restored natural gas service.

Outreach and Intake

Identification and referrals are made by the following:

- Call Center and Collection representatives
- Field service personnel
- Community and social service agencies

Customer Contributions

Equitable solicits customer contributions through a variety of methods including:

- Bill inserts
- Monthly gas bills soliciting automatic sign-up on the payment coupon
- Equitable's website

The Company also participates in the annual Dollar Energy Fund Warmathon, a fundraising effort sponsored by local utilities and KDKA Radio. This fundraising telethon provides additional funding and increases awareness of the Dollar Energy Fund.

Hardship Fund Needs Assessment

Due to the unpredictability of customer donations and additional amounts from other sources, Equitable uses its historical records to project enrollment levels. The Hardship Fund budget includes administrative costs.

Year	Hardship Fund	
	Recipients	Budget
2013	900	\$240,000
2014	900	\$240,000
2015	900	\$240,000
2016	900	\$240,000

Conclusion

The integration of program services together with Company representatives, community agencies and social service organizations enables Equitable to effectively assist customers with bill-payment or energy-related problems.