



COMMUNITY LEGAL SERVICES
OF PHILADELPHIA

March 22, 2017

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Philadelphia Gas Works Universal Service Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. **M-2016-2542415**

Dear Secretary Chiavetta:

Enclosed please find the Reply Comments of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*), on the above-captioned matter.

A copy of the enclosed Comments is being served pursuant to the enclosed Certificate of Service. Please contact me with any questions or concerns.

Sincerely,

Jennifer Collins, Esq.

On behalf of TURN *et al.*

Enclosure

Cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Reply Comments of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*) in the Matter of the Universal Service and Energy Conservation Plan for 2017-2020-PGW, Docket No. M-2016-2542415, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

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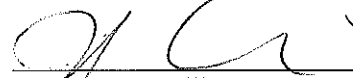
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Dated: March 22, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philadelphia Gas Works Universal Service :
and Energy Conservation Plan for 2017- : Docket No. M-2016-2542415
2020 Submitted in Compliance with 52 Pa. :
Code § 62.4 :

REPLY COMMENTS

of

**TENANT UNION REPRESENTATIVE NETWORK and
ACTION ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA**

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I. Introduction

On January 26, 2017 the Pennsylvania Public Utility Commission (“PUC or “Commission”) issued a Tentative Order (“Tentative Order”) in the matter of Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4., Docket No. M-2016-2542415 (“PGW’s Plan”). The Commission identified 14 areas in which it proposed changes to PGW’s Plan or asked for further information. The Commission withheld approval of PGW’s Plan pending receipt of further information from PGW and review of stakeholder comments. On February 15, 2017, PGW provided “Supplemental Information Submitted by Philadelphia Gas Works in Response to the January 26, 2017 Tentative Order” (“Supplemental Info”), which included as an attachment a 2015 Policy Evaluation performed by H. Gil Peach & Associates (“Peach Study”). In response to the Tentative Order, Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively “TURN *et al.*”) submitted comments on March 7, 2017.

Comments were also submitted by the Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”). The purpose of these Reply Comments is to respond to positions of the other parties addressing the issues that the Commission identified in its January 26, 2017 Tentative Order and otherwise concerning PGW’s Plan. TURN *et al.* submit that there remain a number of unresolved issues of material fact. TURN *et al.*, therefore, request that these issues be referred to the Office of Administrative Law Judge (“OALJ”) for investigation, hearing and decision.

II. Reply Comments of TURN *et al.*

A. CRP Affordability & Decreasing the Energy Burden for Low Income Customers

The Commission noted that PGW's CRP participation has declined 40% over the past six years.¹ Notwithstanding PGW's CRP outreach efforts, CRP enrollment declined by approximately 9,000 participants in 2016.² TURN *et al.* have submitted that the unaffordability of PGW's CRP program and high energy burden for CRP customers are contributing to the decrease in CRP enrollment among PGW's low income customers.³ CAUSE-PA also identified CRP affordability and CRP customer's high energy burden as a cause for concern.⁴ The Peach Study commissioned by PGW explicitly states that downward adjustment of CRP energy burdens may reduce program attrition.⁵

CAUSE-PA further examined the issue advising that "PGW's affordability targets cannot be assessed in a vacuum – and must be contextualized with the customer's full energy burden, which includes their likely electricity costs" (i.e., their PECO costs).⁶ CAUSE-PA then presented the combined energy burden for PGW gas heating customers enrolled in PGW's CRP and PECO's CAP, which shows the energy burdens to be 13% for customers at 0-50% FPL, 15% for customers at 51-100% FPL, and 17% for customers at 101-150% FPL.⁷ These burdens far exceed the energy burdens for non-low income customers.⁸ In addition, low income customers in Pennsylvania have an energy burden that is significantly higher than the energy burdens in

¹ Tentative Order at 35.

² Tentative Order at 35.

³ Comments of TURN *et al.* at 25.

⁴ Comments of CAUSE-PA at 43.

⁵ Peach Study at 2.

⁶ Comments of CAUSE-PA at 43.

⁷ Comments of CAUSE-PA at 43.

⁸ According to the National Energy Assistance Director's Association, the mean energy burden for non-low income households is 2.4%. FY 2017 LIHEAP Testimony of NEADA, Prepared for the Subcommittee on Labor, Health and Human Services and Education and Related Agencies, available at <http://neada.org/wp-content/uploads/2016/04/LIHEAPTestimonyFY17.pdf>. Based on these figures, non-low income households have, on average, an energy burden of approximately 1/7th the maximum energy burden imposed on PGW CRP customers.

Pennsylvania's neighboring states.⁹ CAUSE-PA rightly points out that at the current energy burden for CRP enrollees, Philadelphia's low income families are left with little to pay for necessities like food, housing, healthcare, transportation, and childcare.¹⁰ While PGW appears to agree that the goal of its CRP program is bill affordability for low income customers, PGW opposes taking meaningful steps to reduce the energy burden for CRP customers and provide affordable bills.¹¹

TURN *et al.* urge the Commission to lower the energy burden for low income customers. At the current energy burden levels, low income customers in Pennsylvania are expected to pay more than low income customers in neighboring states and significantly more, relative to income, than non-low income customers. Bills calculated under such high energy burdens will continue to beyond the capability of low income customers to pay.

B. PGW Should Increase its LIURP Budget

Both OCA and CAUSE-PA expressed serious concerns about the adequacy of PGW's proposed LIURP budget.¹² TURN *et al.* are similarly concerned. In its 2017-2020 Plan, PGW proposes an increase of its LIURP budget from approximately \$5.8 million as determined in the DSM II Plan to \$6,571,455 in 2017; \$6,582,749 in 2018, \$6,697,312 in 2019, and \$6,622,194 in 2020.¹³ As OCA, CAUSE-PA, and the Commission note, this figure is based on PGW's initial

⁹ In 2016 the Patriot-News ran a series called "Powerless in PA" which chronicled the ways in which low income customers are plagued by unaffordable utility bills that often leave them without heat in the winter. One article cited the significantly higher energy burden for low income customers in Pennsylvania compared to low income customers in New Jersey and Ohio: "In Pennsylvania the maximum [energy burden] is 17% of their income...in Ohio the rate is 12 percent, and in New Jersey it's only 6 percent." See, Simmons-Ritchie, Daniel, "Powerless in Pennsylvania" The Patriot News, Feb. 28, 2016 (A13).

¹⁰ Comments of CAUSE-PA at 44.

¹¹ PGW Supplemental Info at 7.

¹² Comments of OCA at 18-19; Comments of CAUSE-PA at 47-48.

¹³ Tentative Order at 37.

LIURP needs assessment of just over 21,000 customers.¹⁴ Without an accurate needs assessment it is difficult to determine the most appropriate LIURP budget. TURN *et al.* continue to submit that PGW's Plan should be referred to the OALJ for an on-the-record proceeding to determine the exact need for LIURP services in PGW's territory.

PGW's initial needs assessment was woefully inadequate. Even though PGW conceded that its needs assessment could include at least 45,000 *more* customers,¹⁵ it has not proposed any revision of its LIURP budget. CAUSE-PA asserts that even using PGW's revised needs assessment number of 67,367, under PGW's current proposed budget and plan to complete 2,735 jobs per year, "it would take approximately 24.6 years to serve all eligible customers."¹⁶ A 24.6 year timeline is simply unacceptable. Almost 25 years is likely well beyond the useful lifespan of most of the energy efficiency and weatherization measures that PGW currently utilizes as part of its LIURP.

The OCA has proposed that PGW's LIURP budget be increased to \$7.6 million.¹⁷ This amount reflects historical trends of PGW's LIURP budget and spending.¹⁸ TURN *et al.* believe that the \$7.6 million figure proposed by the OCA represents a floor for PGW's LIURP budget. As TURN *et al.* noted in the DSM II proceeding, PGW's LIURP budget must take into consideration the need in its service territory. TURN *et al.* submitted:

The Pennsylvania Code is specific in its requirements for revision to a LIURP budget. Section 58.4(c) provides that 'a revision to a utility's [LIURP] program funding level is to be computed based upon factors listed in this section.' These factors include:

The number of eligible customers that could be provided cost-effective usage reduction services. The calculation shall take into

¹⁴ Tentative Order at 37; Comments of OCA at 18; Comments of CAUSE-PA at 47.

¹⁵ PGW's acknowledged higher estimate remains well below the Commission's estimate, which exceeded 100,000 PGW customers. Tentative Order at 37.

¹⁶ Comments of CAUSE-PA at 48.

¹⁷ Comments of OCA at 18.

¹⁸ Comments of OCA at 19.

consideration the number of customer dwellings that have already received, or are not otherwise in need of, usage reduction services.¹⁹

PGW has not only failed to propose a sufficient LIURP budget to meet the needs of its customers, but has proposed a LIURP budget well below its historical spending trends. At the same time, it proposes spending \$100,000 per year on its new Health and Safety Pilot and \$120,048 on its new LIME program.²⁰ These are programs which TURN *et al.* support.²¹ However, if funding for these programs is to come from a lower LIURP budget (or even a LIURP budget consistent with historical spending), PGW will have even fewer dollars available for traditional LIURP services. This would further extend the time necessary to service eligible households and further weaken PGW's LIURP program.

TURN *et al.* agree with CAUSE-PA that these issues should be referred to the OALJ for a full hearing. If the Commission does not refer them for a full hearing, TURN *et al.* agree that the dispute over the LIURP budget should at least be referred for further comment by PGW and interested stakeholders. If the Commission does not believe that further comment is appropriate then TURN *et al.* request that the Commission order PGW to set the LIURP budget at a level that will account for at least the higher LIURP needs assessment presented by the Commission and PGW's new LIURP offerings.²²

C. PGW Should Respond to CAUSE-PA's Discovery Requests

As part of their Comments filed on March 7, 2017 CAUSE-PA included a letter sent to PGW on March 2, 2017 CAUSE-PA titled a "Request for Information and Data" (CAUSE-PA

¹⁹ Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2016-2020 and Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 PA Code § 62.4 – Request for Waivers, Docket No. P-2014-2459362, TURN *et al.* Main Brief at 12 (filed Nov. 19, 2015) (internal citations omitted).

²⁰ PGW's Plan at 25.

²¹ Comments of TURN *et al.* at 16.

²² Tentative Order at 31.

Attachment A). CAUSE-PA made 27 separate requests to PGW for information regarding PGW's CRP program, LIURP, the Hardship Fund, and CARES. CAUSE-PA submits that it needs responses to these questions in order to better understand PGW's proposals and make recommendations.²³ On March 9, 2017, PGW filed a letter in response to CAUSE-PA's 27 information requests. In its response letter PGW states that "CAUSE-PA's discovery requests...are not consistent with the Commission's discovery rules or the process established in this case for the Commission to review PGW's USECP...PGW will not be providing responses to the twenty-seven discovery requests." On March 20, 2017, CAUSE-PA submitted a letter in response to PGW's refusal to provide information, requesting Commission review and averring that its requests were procedurally and substantively appropriate.

TURN *et al.* agree with CAUSE-PA and urge the Commission to ensure that PGW provides responsive information. CAUSE-PA's requests are wholly consistent with the Commission's requirement that parties "be cooperative in the exchange of information and data relative to this formal proceeding."²⁴ PGW's decision to ignore CAUSE-PA's request for information appears at odds with the Commission's rather straightforward directions. TURN *et al.* submit that, like PGW's Plan, the discovery dispute between CAUSE-PA and PGW should be referred to the OALJ for resolution. At a minimum, the information requested by CAUSE-PA should be provided in order to better enable the Commission to evaluate PGW's Plan and whether PGW's universal service and energy conservation program offerings will adequately serve the interests of low income Philadelphians.

²³ Comments of CAUSE-PA at 18, 21, 24, 30, 45, 49 (noting on multiple occasions that CAUSE-PA reserves the right to comment pending review of PGW's responses).

²⁴ Tentative Order at 1.

D. PGW Can Extend Arrearage Forgiveness at a Modest Cost

The Commission directed PGW to examine the possibility of extending CRP benefits, including arrearage forgiveness, to low income customers deemed ineligible for CRP because their budget billing amount is lower than their CRP rate.²⁵ In PGW's Supplemental Info, PGW admits that its originally cited \$26-36 million cost estimate for this change is incorrect.²⁶ As OCA notes in its comments, PGW's Supplemental Info does not provide a cost estimate for providing CRP benefits to customers with a lower budget bill amount.²⁷ OCA suggests that the cost of providing these additional benefits to non-CRP low income customers would in fact be "significantly less" than PGW's original estimate.²⁸ OCA points out that arrearage forgiveness has comprised a modest portion of PGW's total CRP program costs -- 12% in 2015 and 8% in 2014.²⁹ TURN *et al.* support OCA's request that PGW provide revised estimates for the Commission and the parties.

PGW did not revise its cost estimate in response to the Commission's Tentative Order, however, because it erroneously contended that providing CRP benefits to customers at their budget billing rate would "provide an energy burden amount that is lower than what it would be under the current policy statement on customer assistance programs."³⁰ PGW vaguely and incorrectly suggested these lower bills would somehow be unfair.³¹ As TURN *et al.* have already noted, PGW misreads the CAP policy statement.³² The CAP policy statement is meant to set a range of acceptable ceilings for affordable bills. A lower energy burden would increase the

²⁵ Tentative Order at 10.

²⁶ PGW Supplemental Info at 6-7.

²⁷ Comments of OCA at 6.

²⁸ Comments of OCA at 6.

²⁹ Comments of OCA at 6.

³⁰ PGW Supplemental Info at 7.

³¹ PGW Supplemental Info at 7.

³² Comments of TURN *et al.* at 5.

likelihood that CRP customers can afford their bills and maintain their natural gas service, consistent with the Commission's policy statement. Further, as OCA points out, "the calculation of arrearage forgiveness is not used to determine energy burden for the customer because the CAP customer does not pay the arrearage forgiveness."³³ PGW should be required to provide an accurate cost-estimate for providing CRP benefits to low income customers not currently eligible for CRP because their budget bill is lower than their CRP rate.

E. CRP Should Not be Modified to Include a Consumption Limit

PGW proposed a pilot program implementing a consumption limit for CRP participants consisting of consumption messaging and research into the causes for high use (such research intended to result in PGW's so-called "Reason Analysis"). As proposed by PGW, if a CRP household has annual gas usage exceeding 2,125 CCF, PGW will send a letter explaining the CAP Policy Statement exceptions to consumption limits and provide tips and advice on energy conservation.³⁴ PGW will also refer the CRP customer to the CRP Home Comfort Program for weatherization. CRP customers who exceed PGW's proposed consumption limit and decline CRP Home Comfort services will be terminated from CRP.³⁵ PGW states that it will hold stakeholder meetings before determining its final consumption limit policy.³⁶

TURN *et al.* agree with OCA and CAUSE-PA that any consumption limit program should provide CRP participants with advance notice and subsequent periodic notices when customers are in danger of exceeding their consumption limit.³⁷ CAUSE-PA specifically suggests that customers should be notified "when they reach 50%, 80%, and 100% of the

³³ Comments of OCA at 7.

³⁴ Peach Study at 14.

³⁵ PGW's Plan at 16-18.

³⁶ PGW's Plan at 19.

³⁷ Comments of OCA at 8; Comments of CAUSE-PA at 10.

consumption limits,” and each notification should provide the customer: the opportunity to enroll in LIURP; customer education on energy conservation; and, information about available exemptions and the process for utilizing those exemptions.³⁸ TURN *et al.* believe that providing customers with these periodic notices will give them a meaningful opportunity to decrease their usage consistent with the goals of PGW’s pilot program.³⁹

TURN *et al.* support providing high-usage customers notice about their usage and the opportunity to receive LIURP services. TURN *et al.* agree that PGW’s proposed pilot may be an effective way of gathering information before a future consumption limit policy is enacted. TURN *et al.* remain concerned about the possible long-term implications of the pilot, specifically its potential to result in proposals that will undermine the long-term affordability of goal of CRP.⁴⁰ TURN *et al.* strongly oppose a policy that could further limit CRP discounts, but support other efforts to assist low income high-energy usage households reduce their energy usage. TURN *et al.* agree that PGW should hold stakeholder meetings before any final policy is instituted to ensure that PGW develops a policy that will best serve its low income customers.

F. Support for Use of Outside Organizations to Increase CRP Enrollment

In its Tentative Order, the Commission noted concern about the decreasing enrollment in CRP. PGW’s enrollment has declined over 40% in the past 6 years.⁴¹ TURN *et al.*’s Comments provide a number of recommendations for increasing CRP enrollment including: allowing customers to enroll based on a total bill analysis; creating a welcome-back program for terminated customers; and, reducing the energy burden for CRP enrollees.⁴² The OCA also

³⁸ Comments of CAUSE-PA at 10.

³⁹ PGW Supplemental Info at 10.

⁴⁰ Comments of TURN *et al.* at 8.

⁴¹ Tentative Order at 35.

⁴² Comments of TURN *et al.* at 25-28.

suggests that “PGW should investigate using community-based organizations to help expand the eligible customers and to facilitate customers both applying for and timely recertifying for CRP.”⁴³ The OCA has provided support for its assertion that the use of community-based organizations is one avenue for increasing enrollment.⁴⁴ TURN *et al.* agree that community-based organizations should be utilized in PGW’s efforts to increase enrollment in CRP.

G. CRP Health & Safety Budget and Objections to Health & Safety Pilot Waivers

PGW has proposed a pilot project as part of its CRP Home Comfort Program, which would target the highest usage homes and allow contractors to spend up to \$2,000 per-project on the installation of health and safety measures.⁴⁵ PGW states that the goal of the project is to “achieve at least 25% savings and target the highest usage homes.”⁴⁶ In addition to requesting waivers of §§ 58.11, 58.12, and 58.18, PGW will only implement the pilot if it is included in its current proposed LIURP budget.⁴⁷ TURN *et al.* support the goals of the health and safety pilot. The pilot targets homes that have previously been ineligible for LIURP services and has the potential to improve the low income housing stock in Philadelphia.⁴⁸ However, TURN *et al.* agree with CAUSE-PA that “any approval of the proposed pilot must come with an increase in the overall LIURP budget.”⁴⁹ PGW’s proposed LIURP budget is already well below the level necessary to provide timely services to PGW’s low income customers.⁵⁰

⁴³Comments of OCA at 20.

⁴⁴Comments of OCA at 19-20.

⁴⁵ PGW’s Plan at 25.

⁴⁶ PGW’s Plan at 25.

⁴⁷ PGW’s Plan at 25; PGW Supplemental Info at 18.

⁴⁸ Comments of TURN *et al.* at 16-17.

⁴⁹ Comments of CAUSE-PA at 23.

⁵⁰ *Infra* at 6-7.

TURN *et al.* also agree with CAUSE-PA that a 25% achievability savings threshold may be unrealistic.⁵¹ PGW is unable to provide evidence that this is a realistic standard for a LIURP initiative's savings. CAUSE-PA was able to provide evidence that this standard is beyond the level of achievability for the health and safety pilot.⁵² The lack of evidence provided by PGW on this issue supports the issue being sent to the OALJ. In the alternative, TURN *et al.* request that the Commission set a lower and achievable savings standard as measurement of the program's success.

TURN *et al.* also support CAUSE-PA's objection and request for clarification regarding PGW's requested LIURP regulation waivers. Section 58.11 requires that general program measures achieve a simple 7-year payback and a 12-year payback for measures related to insulation, heating system replacement, or water heater and refrigerator replacements.⁵³ PGW proposes, instead a per-project cap,⁵⁴ but as CAUSE-PA points out, PGW never specifies what that cap will be.⁵⁵ Without information on such a critical detail of PGW's proposal, it is impossible to assess the validity of PGW's waiver request. TURN *et al.* agree with CAUSE-PA that PGW's waiver request should not be granted because it is inadequately described and insufficiently supported.

Section 58.12 says that program expenditures can include "incidental repairs to the dwelling necessary to permit proper installation of the program measures or repairs to existing weatherization measures which are needed to make those measures operate effectively."⁵⁶ While PGW notes that the regulations do not explicitly state what they consider an incidental repair,

⁵¹ Comments of CAUSE-PA at 24.

⁵² Comments of CAUSE-PA at 24 ("the average annual energy savings for gas heating programs was 15.9% in 2013; 17.5% in 2012 and 2011; and 14.2% in 2010.").

⁵³ 52 Pa. Code § 58.11.

⁵⁴ PGW Supplemental Info at 20.

⁵⁵ Comments of CAUSE-PA at 26.

⁵⁶ 52 Pa. Code § 58.12.

PGW assumes that the repairs contemplated by its health and safety pilot would fall outside the regulation’s meaning of incidental repairs.⁵⁷ CAUSE-PA argues that any health and safety measures addressed through PGW’s proposal would be incidental to the provision of more traditional LIURP services.⁵⁸ TURN *et al.* agree that the waiver of this section is unnecessary—the Commission should find that that PGW’s Health and Safety repairs are incidental repairs.

PGW also requests a waiver of 52 Pa. Code § 58.18, which allows a utility to seek exemption for its usage reduction program from LIURP regulations when there are “special circumstances” involved.⁵⁹ PGW requests a waiver to the extent that the Commission finds the proposed Health and Safety Pilot is inconsistent with current LIURP regulations.⁶⁰ CAUSE-PA asserts that a waiver pursuant to this section is unnecessary based on PGW’s request for waivers under preceding sections.⁶¹ TURN *et al.* agree with CAUSE-PA that the Commission should not grant PGW unnecessary waivers, and thus PGW’s request for waiver under this section should be denied.

H. PGW Should Establish a Universal Services Advisory Committee

CAUSE-PA recommends that PGW form a Universal Services Advisory Committee (USAC).⁶² The USAC would be set up in accordance with 52 Pa. Code § 58.16, and would bring together interested stakeholders to provide information, advice, and feedback on PGW’s universal service and energy conservation programs. In 1998 PECO set up its USAC, which began as a program dedicated to effectiveness of PECO’s LIURP but has since expanded to

⁵⁷ PGW Supplemental Info at 21.

⁵⁸ Comments of CAUSE-PA at 26.

⁵⁹ *Id.*; PGW Supplemental Info at 21.

⁶⁰ PGW Supplemental Info at 21.

⁶¹ Comments of CAUSE-PA at 27.

⁶² Comments of CAUSE-PA at 12.

cover its entire universal service and energy conservation portfolio.⁶³ TURN *et al.* believe that PGW could benefit from such a committee. An advisory committee would allow PGW and interested stakeholders to discuss issues and concerns related to PGW's universal service and energy conservation offerings more frequently than every three years. PGW would then have an opportunity to work with stakeholders to avoid some of the disputes that could otherwise arise during the 3-year-plan process.

⁶³ Application of PECO Energy Company for Approval of Its Restructuring Plan Under Section 2806 of the Public Utility Code; Joint Petition for Full Settlement of Restructuring Plan and Related Appeals and Applications for a Qualified Rate Order and Application of Generation Assets, Docket Nos. R-00973935 & P-00971265, Joint Petition for Full Settlement of PECO Energy Company's Restructuring Plan and Related Appeals and Application for a Qualified Rate Order and Applications of Transfer of Generation Assets at 30-32 (filed Apr. 28, 1998).

III. CONCLUSION

TURN *et al.* remain concerned about the lack of information PGW has provided with regards to its Plan. TURN *et al.* respectfully request that the Commission refer this proceeding to the OALJ or, in the alternative, accept all of the recommendations set forth in TURN *et al.*'s Comments and these Reply Comments. As set forth herein and therein:

- TURN *et al.* agree with CAUSE-PA that PGW should decrease the energy burden for low income customers and improve CRP affordability.
- PGW's proposed LIURP budget should be rejected because it is based on the insufficient needs assessment initially proposed by PGW.
- TURN *et al.* urge the Commission to refer the matter to the OALJ for a determination of the appropriate LIURP budget.
- TURN *et al.* also believe that PGW should respond to CAUSE-PA's 27 information requests, as they were requested in good faith and comply with the Commission's Tentative Order.
- TURN *et al.* believe that expanding arrearage forgiveness to budget bill customers would not cause a significant cost increase, and request that the Commission either refer this issue to the OALJ or order that PGW extend CRP benefits to customers who do not qualify for CRP because it is not the most "advantageous rate."
- TURN *et al.* oppose any future proposal to include an actual consumption limits within PGW's CRP. TURN *et al.* are concerned with the possible long term consequences of instituting a consumption limit that will result in less affordable bills for CRP participants.
- TURN *et al.* support efforts to increase CRP enrollment that are supported by evidence of effectiveness, like the use of community-based organizations.

- Finally, TURN et al. also support CAUSE-PA's suggestion that PGW create a universal services advisory committee that will foster communication and cooperation between PGW and interested stakeholders on many of the issues raised in PGW's Plan.

Respectfully Submitted.



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Dated: March 22, 2017