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| PUC logo | *COMMONWEALTH OF PENNSYLVANIA*  *PENNSYLVANIA PUBLIC UTILITY COMMISSION*  *BUREAU OF CONSUMER SERVICES*  *P.O. BOX 3265, HARRISBURG, PA 17105-3265* |

April 11, 2017

**Docket No:** M-2016-2542415

To: Philadelphia Gas Works and All Parties to M-2016-2542415

Re: Request for Additional Information Regarding PGW’s Proposed 2017-2020 USECP

On January 26, 2017, the Pennsylvania Public Utility Commission (Commission) entered a Tentative Order, requesting additional information prior to approving the proposed 2017-2019 Universal Service and Energy Conservation Plan (Proposed 2017-2020 Plan or USECP) for Philadelphia Gas Works (PGW or Company). PGW filed supplemental information addressing issues raised in the Tentative Order on February 15, 2017. The Office of Consumer Advocate (OCA), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al*.) individually filed comments on March 7, 2017. OCA, TURN *et al*., and PGW individually filed reply comments on March 22, 2017.

In the Tentative Order, the Commission urged “parties to be cooperative in the exchange of information and data relative to this formal proceeding.” Tentative Order at 1. On March 2, 2017, CAUSE-PA sent a letter to PGW requesting information and data on various aspects of its universal service programs. CAUSE-PA included a copy of this letter with its comments submitted on March 7. CAUSE-PA Comments at Attachment A. On March 9, 2017,PGW filed a letter to the Commission objecting to the request for information from CAUSE-PA, arguing that only the Commission has authority to compel discovery in a USECP proceeding. On March 20, 2017, CAUSE-PA filed a letter asserting that the requested information is relevant to the review of PGW’s proposed 2017-2020 USECP.

Upon review of the supplemental information provided by PGW, comments and reply comments from PGW and other stakeholders, and our review of the additional information requested by CAUSE-PA, we direct PGW to provide the additional data identified below. To ensure that participating parties have an opportunity to comment on all information provided, PGW should file and serve the following additional information regarding its Universal Service programs:

1. If a customer has experienced changes in household income after leaving PGW’s Customer Responsibility Program (CRP), does PGW recalculate the CRP Cure amount needed to re-enroll in the program based on this new income?
2. Regarding PGW’s Health and Safety Pilot, will the Company treat any *de facto* heating situations under this pilot if the household also has health and safety issues?
3. Identify how many people are employed in the PGW Cares unit and the job titles of this staff.
4. Explain the reason for the decline in the number of Hardship Fund participants from 2,257 customers in 2009-2010 to 992 customers in 2014-2015.
5. PGW estimates that it will pay the Utility Emergency Service Fund (UESF) $260,149 annually to administer its Hardship Fund program through 2020. Proposed 2017-2020 USECP at 30. We have concerns about the amount spent on Hardship Fund administration, especially considering the declining number of customers benefiting from this program. The following table shows the amount of administrative funds spent per customer from 2010 through 2015:

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| **Program Year** | **Admin Costs** | **Customers Receiving Grants** | **Admin Cost Per Customer** |
| 2009-2010 | $241,128 | 2,257 | $106.84 |
| 2010-2011 | $220,148 | 2,263 | $97.28 |
| 2011-2012 | $220,148 | 1,676 | $131.35 |
| 2012-2013 | $227,715 | 1,184 | $192.33 |
| 2013-2014 | $240,074 | 1,324 | $181.32 |
| 2014-2015 | $260,149 | 992 | $262.25 |
| 2017-2020  (Annual Projection) | $260,149 | 1,000 | $260.15 |

We request a justification and cost breakdown for the annual administrative funds paid to the Utility Emergency Service Fund (UESF) for administering PGW’s Hardship Fund.

In order for the Commission’s review of PGW’s Amended Proposed 2017-2020 USECP to proceed, PGW must file supplemental comments in response to this data request and serve all parties and interveners at this docket no later than April 21, 2017. We invite parties to comment on the supplemental comments no later than April 28, 2017. Reply comments must be submitted no later than May 5, 2017.

Questions may be directed to Joseph Magee, [jmagee@pa.gov](mailto:jmagee@pa.gov), and Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov).

 Very truly yours,

Rosemary Chiavetta

Secretary

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