

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 5, 2017

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

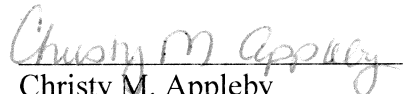
Re: Philadelphia Gas Works Universal Service  
and Energy Conservation Plan for 2017-2020  
Submitted in Compliance with § 62.4  
Docket No. M-2016-2542415

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Supplemental Reply Comments  
in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

  
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Certificate of Service

\*232757

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Supplemental Reply Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 5th day May 2017.

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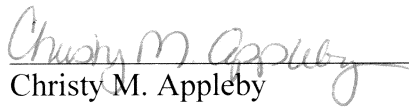
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Philadelphia Gas Works Universal Service :  
And Energy Conservation Plan for 2017-2020 : Docket No. M-2016-2452415  
Submitted in Compliance with 52 Pa. Code § 62.4 :

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SUPPLEMENTAL REPLY COMMENTS  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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The Office of Consumer Advocate files these Supplemental Reply Comments pursuant to the Pennsylvania Public Utility Commission’s (Commission) directive in the Secretarial Letter Request for Additional Information Regarding PGW’s Proposed 2017-2020 USECP entered on April 11, 2017 at the above-referenced docket.

**I. Introduction**

On April 28, 2016, Philadelphia Gas Works (PGW or Company) filed its Universal Service and Energy Conservation Plan (USECP or Plan) for 2017 through 2020, in accordance with the Commission’s regulations at 52 Pa. Code § 62.4, relating to natural gas universal service and energy conservation requirements. On November 16, 2016, PGW filed its Amended USECP. On January 26, 2017, the Commission entered its Tentative Order on the Plan which requested Supplemental Information prior to the filing of Comments by interested parties. On February 15, 2017, PGW filed the Supplemental Information in Response to the January 26, 2017 Tentative Order. Pursuant to the Tentative Order, on March 7, 2017, the OCA, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), and the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN et al.) filed Comments, and on March 22, 2017, Reply Comments were

filed by TURN *et al.* and PGW. CAUSE-PA submitted a letter in support of the OCA and TURN *et al.* Comments.

On April 11, 2017, the Commission issued a Secretarial Letter which required the Company to provide additional information regarding the following: (1) Customer Responsibility Program (CRP) Cure amount; (2) the treatment of *de facto* heating in the Company's proposed Health and Safety Pilot; (3) CARES staffing levels; (4) Hardship Fund participation; and (5) administrative funds paid to the Utility Emergency Service Fund (UESF). Secretarial Letter at 2. On April 21, 2017, PGW filed Supplemental Information in Response. On April 28, 2017, TURN *et al.* and CAUSE-PA filed Comments. The OCA files these Supplemental Reply Comments in support of the Comments of TURN *et al.* and CAUSE-PA regarding the Customer Assistance and Referral Evaluation Services (CARES) program.

## **II. Supplemental Reply Comments**

In its Secretarial Letter, the Commission requested that PGW identify the number of people that are employed in the PGW CARES unit and the job titles of the staff. Secretarial Letter at 2. In response, PGW stated that its CARES program has two components: (1) a "quick fix" and (2) case management. The "quick fix" is provided by the Company's 140 customer service representatives. The customer service representatives will refer customers to resources identified in the Company's resource guide. There is no follow-up action taken on these referrals. The case management component includes "ongoing monitoring and follow-up services for the customer." PGW Suppl. Response Letter at 2. PGW states that these follow-up case management services are handled, as needed, by any of the six members of the Universal Services Department. Id.

In their respective Comments, CAUSE-PA and TURN *et al.* identify concerns with PGW's approach to the CARES component of its universal service program. See, TURN *et al.* at 7-10; CAUSE-PA at 4-5. TURN *et al.* recommends that "PGW should be required to assign dedicated staff to its CARES program with a detailed description of their responsibilities, and PGW should further be required to track its CARES quick fix referrals along with more extensive case management services." TURN *et al.* Comments at 10. CAUSE-PA also recommends that the Company have targeted CARES staff to provide case management services. CAUSE-PA Comments at 5. The OCA shares the concerns of TURN *et al.* and CAUSE-PA that insufficient attention is being paid to the CARES program. The OCA supports TURN *et al.*'s and CAUSE-PA's proposal to dedicate staff specifically to the CARES program and TURN *et al.*'s recommendation to separately track both quick fix referrals and more extensive case management services.

The CARES program plays an important role to ensure that customers maximize their income and resources available to help them pay their bills. CARES is a required component of the Company's low-income program. The Commission regulations define CARES as "a program that provides a cost-effective service that helps selected, payment-troubled customers maximize their ability to pay utility bills. A CARES program provides a casework approach to help customers secure energy assistance funds and other needed services." 52 Pa. Code § 54.72. PGW's USECP states that the objective of the program is "to help customers resolve issues related to and beyond bill payment and energy affordability and to provide follow-up and case management services as needed." PGW USECP at 21. PGW states that the objectives are "achieved mainly by referrals to programs and organizations that can address customers' specific needs" while "[s]ome CARES cases require follow-up and ongoing case management." PGW

USECP at 21. In order to be eligible for CARES assistance, PGW's Plan requires that the customer "must be experiencing difficulty paying a bill due to special circumstances, such as job loss, medical emergency, domestic abuse." PGW USECP at 35.

The OCA supports the CARES objectives identified by PGW, however, the OCA agrees with CAUSE-PA's and TURN *et al.*'s Comments regarding the Company's execution of its objectives. The CARES program can only be as effective as the resources available to implement the program, and the OCA agrees with TURN *et al.*'s Comments that the "limited attention and resources dedicated to CARES" impacts the overall effectiveness of CARES. TURN *et al.* Comments at 10; see also, CAUSE-PA Comments at 5. While PGW states that approximately 29% of its customers may be eligible for CARES services, in the three fiscal years 2013 through 2015, the Company's six member staff handled a total 812 CARES cases through on-going case management, or approximately 22.6 per month. PGW USECP at 21.<sup>1</sup> The OCA agrees with TURN *et al.*'s and CAUSE-PA's concerns regarding the depth of case management that may be provided by non-exclusive CARES staff who also must address all aspects of a large universal service program. See, TURN *et al.* Comments at 9.<sup>2</sup>

The OCA agrees that it appears that insufficient attention is being devoted to the CARES program. The OCA submits that the more access to resources that needy customers have, the more likely customers will have the means and resources to pay their utility bills. CARES must be adequately funded and staffed such that the program has the ability to support these functions. The OCA submits that the Commission should adopt the recommendations of CAUSE-PA and TURN *et al.* regarding the CARES staffing and the tracking of referrals.

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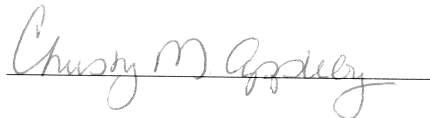
<sup>1</sup> The Company states that it does not track quick-fix referrals. PGW USECP at 21.

<sup>2</sup> PGW projects its CAP enrollment to increase from 61,292 customers in 2017 to 65,292 customers in 2019. PGW USECP at 35.

### III. Conclusion

The Office of Consumer Advocate appreciates the opportunity to provide these Supplemental Reply Comments on PGW's Universal Service and Energy Conservation Plan for 2017-2020. The Office of Consumer Advocate respectfully requests that PGW's Universal Service and Energy Conservation Plan be approved and modified in accordance with the OCA's Comments to the Tentative Order and these Supplemental Reply Comments.

Respectfully Submitted,



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DATE: May 5, 2017  
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