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|  | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  P.O. BOX 3265, HARRISBURG, PA 17105-3265 | **IN REPLY PLEASE REFER TO OUR FILE**  P-2020-3022691 |

**November 17, 2020**

TO: All Parties of Record in Docket Nos. P-2020-3022691 and M-2018-2645401

**RE: Petition of** **Columbia Gas of Pennsylvania (Columbia) to temporarily amend its current 2019 Universal Service and Energy Conservation Plan (USECP)[[1]](#footnote-2)**

This Secretarial Letter grants Columbia Gas permission to temporarily expand the income limits of its Hardship Fund program from 200% of the federal poverty income guidelines (FPIG) to 300% of the FPIG through September 30, 2021.

On October 26, 2020, Columbia filed a petition with the Pennsylvania Public Utility Commission (Commission) at Docket No. M-2019-2645401 to request a temporary change to the income eligibility provision of its Hardship Fund program from annual incomes at or below 200% of the FPIG to annual incomes at or below 300% of the FPIG. Columbia proposes maintaining the increased income eligibility provision for the Hardship Fund program through the remaining Hardship Fund program year, which ends on September 30, 2021. Columbia Petition at 1.

To address the increased pool of eligible customers, Columbia proposes to increase its Hardship Fund budget by $400,000.[[2]](#footnote-3) This additional funding will be provided by the NiSource Foundation. All unspent funds will remain in the Hardship Fund at the conclusion of the 2020-2021 program year. Columbia Petition at 2.

Columbia explains that it is making the request in response to the COVID-19 pandemic emergency to temporarily expand the number of customers who may qualify for assistance under the Hardship Fund. Columbia notes that this income threshold aligns with the “protected customer” class established in the Commission’s October 13, 2020 Order at Docket No. M-2020-3019244. Columbia Petition at 1-2. Columbia reports that the Office of Consumer Advocate (OCA) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) have been consulted and do not oppose this proposed change.[[3]](#footnote-4) Columbia Petition at 3.

Columbia’s Hardship Fund, which is administered by Dollar Energy Fund (DEF), provides grants up to $500 per year to residential customers who are low income with overdue balances. Columbia’s customers are currently eligible to apply for Hardship Fund assistance if they:

(1) Have household incomes at or below 200% of the FPIG;

(2) Have an inability to pay the full amount of energy bills;

(3) Are a residential account and reside at the address; and

(4) Have a balance of at least $100 (customers age 62 and older are not required to have a balance due);

(5) Must have exhausted all other available assistance resources; and

(6) Have made a minimum payment of $150.00 towards their utility bill within the last 90 days or have made three consecutive CAP payments (customers aged 62 and older must have paid at least $100).

Columbia 2019 USECP at 20.

CAP customers may only receive a hardship fund grant if they are without service during the months of October, November and December. [[4]](#footnote-5) The Hardship Fund grants are funded through donations and corporate contributions. Only Hardship Fund administration costs are recovered from Columbia residential ratepayers. Columbia’s 2019 USECP at 20-21.

Columbia has previously proposed adopting a temporary program to help customers impacted by the COVID-19 pandemic. In a Petition filed on April 24, 2020 at Docket No. P-2020-3019578 (April 24 Petition), Columbia requested permission to use residential pipeline penalty and refund proceeds funds traditionally allocated to its Hardship Fund program to provide grants to customers with incomes at or below 300% of the FPIG experiencing a reduced income due to the COVID-19 pandemic and not eligible for its Customer Assistance Program or Hardship Fund. In an order entered on July 16, 2020, (July 16 Order) the Commission denied that petition due, in part, to concerns about reducing available funding for Columbia’s Hardship Fund program. *See* July 16 Order at 19-23.

Columbia Gas’ instant petition, however, differs significantly from its April 24 Petition. The instant petition proposes to temporarily expand the income eligibility limits of its Hardship Fund program to 300% of FPIG and increase the amount of funding for grants available to all eligible customers. The Commission has approved similar requests by PPL and Duquesne Light to temporarily increase their Hardship Fund program income eligibility limits up to 250% of the FPIG. *See* *Petition of PPL to temporarily amend its current 2017-2022 USECP*, Docket No. M-2016-2554787 (Secretarial Letter issued on March 30, 2020); and *Petition of Duquesne Light to temporarily amend its current 2017-2019 USECP*, Docket Nos. P‑2020‑3019460 and M‑2016-2534323 (Secretarial Letter issued on April 17, 2020).

The Commission recognizes that households whose incomes exceed the eligibility limits for traditional energy assistance programs may be experiencing temporary financial hardships due to the COVID-19 crisis. Therefore, the Commission supports Columbia’s proposal to temporarily increase its income limits for the Hardship Fund to help more customers address energy debt and maintain service through the remaining 2020-2021 Hardship Fund season, which ends on September 30, 2021.

Accordingly, the Commission hereby approves Columbia’s Petition to increase the income eligibility threshold for its Hardship Fund from 200% of the FPIG to 300% of the FPIG through September 30, 2021. Columbia is directed to reflect this temporary change on its website and in communications with customers.

If you have any questions, please contact Joseph Magee in the Commission’s Bureau of Consumer Services at [jmagee@pa.gov](mailto:jmagee@pa.gov) or 717-772-1204.

**** Sincerely,

# Rosemary Chiavetta

Secretary

cc: Lori Mohr, BCS, [laumohr@pa.gov](mailto:laumohr@pa.gov)

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Parties of Record in M-2018-2645401, R-2018-2647577, and R-2020-3018835

1. Columbia’s 2019-2021 USECP (2019 USECP) was filed on November 25, 2019 and approved by an Order entered on January 16, 2020 at Docket No. M-2018-2645401. The 2019 USECP remains in effect until a new USECP is approved. The 2019 USECP was extended through 2023, pursuant to Commission order entered on October 3, 2019, at Docket No. M‑2019-3012601. <https://www.puc.pa.gov/pcdocs/1645337.pdf> [↑](#footnote-ref-2)
2. Columbia 2019-2021 USECP Docket No. M-2018-2645401, the Hardship Fund has a yearly balance of $300,000. No ratepayer funds are used for Hardship Fund grants. This is a dollar matched, up to $150,000 for every dollar contributed by customers, up to $150,000. Additional funds may be raised by Columbia and added to this $300,000 total. Columba 2019-2021 USECP at 20-21. [↑](#footnote-ref-3)
3. This Petition was served on the Commission, the Commission’s Bureau of Investigation and Enforcement (BI&E), the Bureau of Consumer Services (BCS), the Office of Small Business Advocate (OSBA), the Office of Consumer Advocate (OCA), and the Pennsylvania Utility Law Project (PULP). OCA and CAUSE-PA are the only active parties, besides Columbia, in Columbia’s 2019-2021 USECP proceeding. Columbia reports that it has also served electronic copies of this filing to all active parties in its rate case at Docket Nos. R-2018-2647577 and R‑2020-3018835. [↑](#footnote-ref-4)
4. Columbia has voluntarily suspended the Hardship Fund minimum payment requirement and restrictions on applications for CAP customers through 2020 due to the COVID-19 pandemic. Columbia Comments at 4, Emergency Order Establishing Public Service Termination Moratorium, Docket No. M-2020-3019244. [↑](#footnote-ref-5)