

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
	:	
v.	:	Docket No. R-2018-3006818
	:	
Peoples Natural Gas Company, LLC	:	
	:	

Direct Testimony of
Roger D. Colton

On Behalf of:
Office of Consumer Advocate

April 29, 2019

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1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. My name is Roger Colton. My address is 34 Warwick Road, Belmont, MA.

3

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?**

5 A. I am a principal in the firm of Fisher Sheehan & Colton, Public Finance and General
6 Economics of Belmont, Massachusetts. In that capacity, I provide technical assistance to
7 a variety of federal and state agencies, consumer organizations and public utilities on rate
8 and customer service issues involving telephone, water/sewer, natural gas and electric
9 utilities.

10

11 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

12 A. I am testifying on behalf of the Office of Consumer Advocate.

13

14 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND.**

15 A. I work primarily on low-income utility issues. This involves regulatory work on rate and
16 customer service issues, as well as research into low-income usage, payment patterns,
17 and affordability programs. At present, I am working on various projects in the states of
18 Rhode Island, Maryland, Pennsylvania, Michigan, Illinois and Iowa, as well as in the
19 provinces of Ontario and British Columbia. My clients include state agencies (e.g.,
20 Pennsylvania Office of Consumer Advocate, Maryland Office of People's Counsel,
21 Illinois Office of Attorney General), federal agencies (e.g., the U.S. Department of Health
22 and Human Services), community-based organizations (e.g., Energy Outreach Colorado,
23 Natural Resources Defense Council, Advocacy Centre Tenants Ontario), and private

1 utilities (e.g., Unitil Corporation d/b/a Fitchburg Gas and Electric Company, Entergy
2 Services, Xcel Energy d/b/a Public Service of Colorado). In addition to state-specific and
3 utility-specific work, I engage in national work throughout the United States. For
4 example, in 2011, I worked with the U.S. Department of Health and Human Services (the
5 federal LIHEAP office) to advance the review and utilization of the Home Energy
6 Insecurity Scale as an outcomes measurement tool for the federal Low-Income Home
7 Energy Assistance Program (“LIHEAP”). In 2007, I was part of a team that performed a
8 multi-sponsor public/private national study of low-income energy assistance programs. A
9 brief description of my professional background is provided in Appendix A.

10
11 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

12 A. After receiving my undergraduate degree in 1975 (Iowa State University), I obtained
13 further training in both law and economics. I received my law degree in 1981 (University
14 of Florida). I received my Master’s Degree (regulatory economics) from the MacGregor
15 School in 1993.

16
17 **Q. HAVE YOU EVER PUBLISHED ON PUBLIC UTILITY REGULATORY**
18 **ISSUES?**

19 A. Yes. I have published three books and more than 80 articles in scholarly and trade
20 journals, primarily on low-income utility and housing issues. I have published an equal
21 number of technical reports for various clients on energy, water, telecommunications and
22 other associated low-income utility issues. A list of my publications is included in
23 Appendix A.

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Q. HAVE YOU EVER TESTIFIED BEFORE THIS OR OTHER UTILITY COMMISSIONS?

A. Yes. I have testified before the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on numerous occasions regarding utility issues affecting low-income customers and customer service. I have also testified in regulatory proceedings in more than 35 states and various Canadian provinces on a wide range of utility issues. A list of the proceedings in which I have testified is listed in Appendix A.

Q. PLEASE EXPLAIN THE PURPOSE OF YOUR DIRECT TESTIMONY.

A. The purpose of my Direct Testimony is as follows.

- First, I examine the impact of Peoples Natural Gas’s (sometimes hereafter referred to as “Peoples” or “Company”)¹ proposed increase in its fixed monthly residential customer charge;
- Second, I examine cost recovery for the Peoples Customer Assistance Program (“CAP”);
- Third, I examine the extent to which the manner in which Peoples Natural Gas identifies its “confirmed low-income customers” complies with PUC regulations;
- Fourth, I assess certain operational difficulties I have identified with the Peoples Natural Gas Customer Assistance Program (“CAP”);

¹ References to Peoples or the Company are intended to refer to Peoples Natural Gas and Peoples Equitable combined unless expressly stated otherwise or unless the context clearly indicates to the contrary.

- Fifth, I examine how Peoples Natural Gas can and should improve a variety of aspects of its delivery of reasonable customer service;
- Sixth, I examine the impacts of the Peoples Natural Gas proposals to incorporate third party payment process fees into revenue requirement; and
- Finally, I assess whether the customer satisfaction surveys discussed by Peoples Natural Gas establish that the Company is providing excellence in customer service.

Summary of Recommendations

Q. PLEASE PROVIDE A SUMMARY OF THE RECOMMENDATIONS YOU MAKE IN YOUR DIRECT TESTIMONY.

A. Based on the data and analysis presented throughout my Direct Testimony, I recommend as follows:

- That the OCA’s proposed customer charge be adopted;
- That the bad debt offset to CAP costs be set at 6.44% for CAP Credits and Arrearage Forgiveness credits;
- That the base CAP participation rate over which the bad debt offset to CAP costs is applied be set at 32,300 (13,800 for Peoples-Equitable and 18,500 for Peoples);
- That the Peoples universal service rider for the two Peoples divisions be incorporated together, collected and disbursed such that the affected communities continue to receive a fair share of universal service funding;
- That Peoples be directed to modify its tariffs and procedures, including staff training, to comply with PUC regulations defining “confirmed low-income customer,” including the acceptance of self-certification of income for purposes of identifying a “confirmed low-income customer”;

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- That Peoples be directed to deliver a plan to the PUC outlining its proposals on how it will expand CAP outreach, not only for initial enrollment but for reenrollment and income recertification, through the use of Community Based Organizations;
- That Peoples adopt a collection procedure that will not disconnect service for nonpayment to a confirmed low-income customer without first providing a stand-alone Plain English notice to that customer of the customer’s right to enter into CAP and an explanation of CAP’s arrearage forgiveness benefits;
- That Peoples eliminate its restriction on Budget Billing enrollment that bars the enrollment of customers in arrears in Budget Billing. Upon request to enter into Budget Billing, a customer in arrears should be placed on Budget Billing while spreading their arrears over a period consistent with the PUC regulation applicable to the individual customer.
- That Peoples expand its Third Party Notice program in all the respects outlined in my Direct Testimony;
- That Peoples expand its mechanism for identifying customers who are qualified for the PUC’s cold weather protections in all the respects outlined in my Direct Testimony; and
- That the PUC adopt the OCA recommendation regarding the UGI Gas proposal to incorporate third party payment fees into revenue requirement; and
- That the PUC find that the Peoples “customer satisfaction” surveys do not support a finding of the delivery of superior customer service.

Part 1. The Proposed Peoples Monthly Fixed Customer Charge.

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- Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.**
- A. In this section of my testimony, I examine the impacts which the Company’s proposed increase in its fixed monthly residential customer charge will have on low-income and

1 low-use customers. I further examine the extent to which those two populations (low-
2 income, low use) coincide. The Company proposes to increase its fixed monthly
3 customer charge to \$20. (PNG St. 11, at 46). This is an increase in the customer charge
4 of \$6.05/month for Peoples and of \$6.75/month for Equitable. (Id.)
5
6

7 **Q. DOES THE COMPANY’S CUSTOMER ASSISTANCE PROGRAM (“CAP”)**
8 **PROTECT LOW-INCOME CUSTOMERS FROM THE INCREASED FIXED**
9 **CHARGES?**

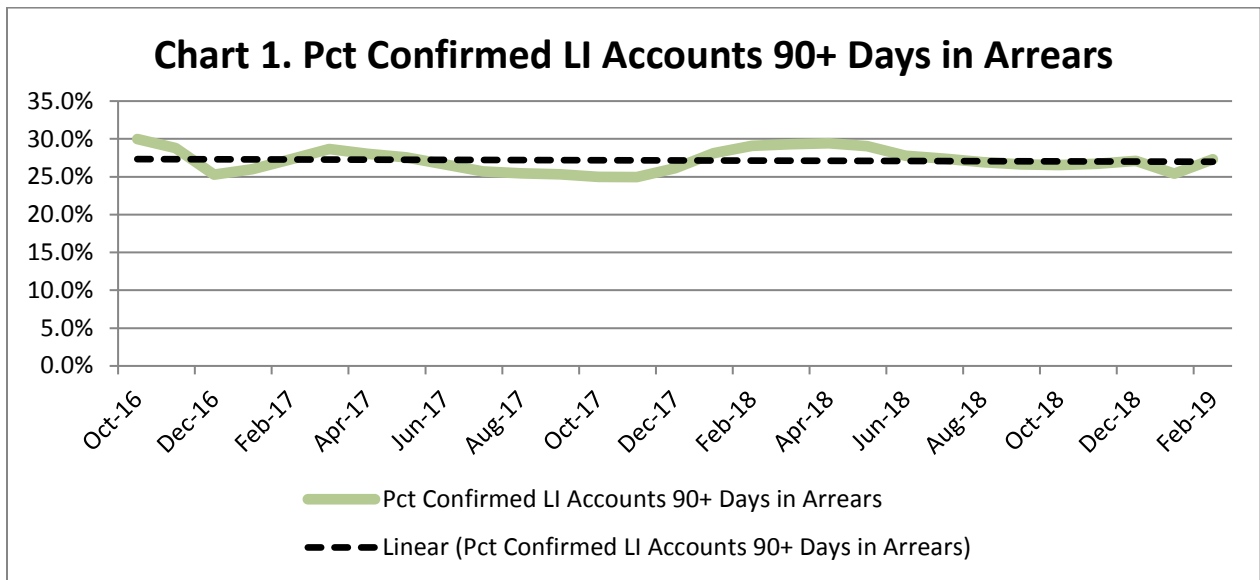
10 A. No. The Peoples Customer Assistance Program (“CAP”) serves a relatively small
11 proportion of Peoples customers. As of February 2019, Peoples had 33,128 CAP
12 participants. (OCA-III-13). In contrast, in 2017, Peoples had 104,704 confirmed low-
13 income customers.² (2017 BCS Annual Report on Collections Performance and
14 Universal Service Programs, at 7). In addition, in 2017, Peoples had 154,473 estimated
15 low-income customers.³ (2017 BCS, at 8). Peoples, in other words, enrolls roughly 20%
16 of its eligible customers in CAP. Nearly four out of every five low-income customers on
17 the Peoples system would not be protected by CAP. In fact, even within its “confirmed
18 low-income” population, Peoples enrolls fewer than one-of-three customers in CAP
19 (33,128 / 104,704 = 0.316). Overall, a relatively small proportion of the confirmed low-
20 income population base receives the affordability protections of CAP.
21

² 60,077 Peoples; 44,627 Equitable.

³ 89,417 Peoples; 65,056 Equitable.

1 **Q. DO LOW-INCOME CUSTOMERS NOT IN CAP HAVE DIFFICULTY IN**
 2 **PAYING THEIR BILLS?**

3 A. Yes. In the past two-plus years, of those customers that have been identified as
 4 “confirmed low-income,” the percentage with long-term arrears has remained reasonably
 5 constant. Chart 1 below shows the percentage of confirmed low-income customers 30 or
 6 more days in arrears who are, in fact, more than 90 days in arrears.



7
 8 Not only do a high percentage of confirmed low-income customers have long-term (90+
 9 days) arrears, but confirmed low-income customers have high arrearages as well.

10 According to the most recent (2017) BCS report on universal service programs and
 11 collections performance, the average arrears of confirmed low-income customers in
 12 arrears for the two Peoples divisions was \$391.38 (Peoples) and \$342.47 (Peoples-
 13 Equitable). Given that Peoples limits its definition of a “confirmed low-income
 14 customer” to those customers who either participate in CAP or who receive LIHEAP,⁴
 15 the size of these arrears is disturbing. The customers who Peoples defines as “confirmed

⁴ This limitation on the definition of “confirmed low-income” will be discussed further below.

1 low-income” are those who are receiving assistance. Nonetheless, they maintain
2 arrearages that are substantial and that are reasonably old (in terms of the aging of
3 accounts).

4
5 In light of this data, the Peoples proposal to increase the fixed charges on its system
6 should be rejected. Increasing the monthly fixed charge will contribute further to both
7 the incidence of low-income customers in arrears (i.e., number of accounts in arrears) and
8 the depth of those arrears. Moreover, this increase builds on itself. As confirmed low-
9 income customers face higher and higher fixed charges, their total bills (bills for arrears
10 plus bills for current service) become less and less affordable. As more and more
11 confirmed low-income customers face higher arrears, fewer and fewer are eligible to
12 enter into Budget Billing to levelize their bills to help avoid arrears.

13
14 **Q. AREN'T THE ADVERSE IMPACTS THAT YOU DISCUSS ATTRIBUTABLE**
15 **TO THE RATE CASE GENERALLY AND NOT TO ANY INCREASE IN THE**
16 **CUSTOMER CHARGE IN PARTICULAR? ARE THERE SPECIFIC ADVERSE**
17 **IMPACTS ATTRIBUTABLE TO THE INCREASED CUSTOMER CHARGE?**

18 A. The adverse impacts I identify above cannot be attributed exclusively to any increase in
19 rates arising from the Company's proposed rates in general in this proceeding. One
20 impact of the Company's proposed increase in the fixed monthly customer charge is that
21 a higher percentage of total rates will be unavoidable. As a result, the adverse impacts
22 flow not merely from the rate increase in general, but also from the increase in the fixed
23 monthly customer charge in particular.

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Q. DOES THE DISPROPORTIONATE ADVERSE IMPACT OF THE INCREASED CUSTOMER CHARGE ON LOW-INCOME CUSTOMERS HAVE A CORRESPONDING FINANCIAL IMPACT ON NON-LOW-INCOME CUSTOMERS?

A. Yes. The proposed increase in the Company’s fixed monthly customer charge imposes disproportionately high rate increases on low-use customers, whether low-income or non-low-income. Low-use customers in the Company’s service territory, however, tend also to be disproportionately low-income customers. As a result, through its increased customer charge, the Company proposes to increase rates the most for those who disproportionately can least afford to pay those rate increases. Not only are proportionately more confirmed low-income customers in arrears, but those who are in arrears, are *deeper* in arrears. Peoples proposes to respond to these circumstances by *raising* rates the most, in an unavoidable manner, to these customers. The resulting increase in bad debt, working capital, and credit and collection costs will be borne by all ratepayers.

Q. PLEASE EXPLAIN THE BASIS FOR YOUR CONCLUSION THAT LOW-INCOME CUSTOMERS ARE DISPROPORTIONATELY LOW-USE CUSTOMERS.

A. While low-income households tend to have less efficient energy consumption than do residential customers generally on a per square foot of housing basis, because they live in much smaller housing units, they disproportionately tend to have lower overall natural

1 gas consumption. The most recent data published by the U.S. Department of Energy
 2 (DOE) in its 2009 Residential Energy Consumption Survey (RECS) shows the following
 3 for total energy usage in the Northeast (RECS, Table CE1.2).

Home Energy Use by Income (Residential Energy Consumption Survey)		
2009 Annual Household Income	Per Square Foot (thousand Btu)	Per Household (million Btu)
Less than \$20,000	65.0	83.3
\$20,000 to \$39,999	56.3	98.2
\$40,000 to \$59,000	49.8	98.9
\$60,000 to \$79,999	48.4	99.9
\$80,000 to \$99,999	48.4	119.2
\$100,000 to \$119,999	42.4	131.1
\$120,000 or More	45.9	154.8

4 The same results appertain when the examination is limited exclusively to natural gas.
 5
 6 According to the DOE’s RECS (Table CE2.2), in the Northeast, the region of which
 7 Pennsylvania is a part, as incomes increase, natural gas usage increases correspondingly.

Natural Gas Usage by Income (Residential Energy Consumption Survey)		
2009 Annual Household Income	mmBtu	MCF
Less than \$20,000	58.7	57
\$20,000 to \$39,999	76.5	75
\$40,000 to \$59,000	69.7	68
\$60,000 to \$79,999	70.7	69
\$80,000 to \$99,999	81.2	79
\$100,000 to \$119,999	92.7	90
\$120,000 or More	114.4	112

9 It does not matter which end-use is being examined. As income increases, so, too, does
 10 energy usage increase. The average household data by-end-use, in million BTU, for
 11

1 Northeast households using the end-use (RECS, Table CE3.2) is presented immediately
 2 below.

Natural Gas Consumption by End-Use and Income (mmBtu) (Northeast) (Residential Energy Consumption Survey)			
2009 Annual Household Income	Total	Space Heating	Water Heating
Less than \$20,000	83.3	51.2	12.5
\$20,000 to \$39,999	98.2	57.2	16.4
\$40,000 to \$59,000	98.9	55.1	16.1
\$60,000 to \$79,999	99.9	55.1	16.5
\$80,000 to \$99,999	119.2	64.0	19.0
\$100,000 to \$119,999	131.1	65.9	22.6
\$120,000 or More	154.8	78.7	26.6

3
 4 **Q. DOES THE DEPARTMENT OF ENERGY PROVIDE DATA THAT HELPS TO**
 5 **EXPLAIN WHY LOW-INCOME CUSTOMERS TEND ALSO TO BE LOW USE**
 6 **CUSTOMERS?**

7 A. Yes. The RECS data clearly shows that natural gas consumption increases as the size of
 8 the housing unit increases. The related housing characteristics support this conclusion.
 9 Residents of single family housing have greater consumption than residents of multi-
 10 family housing. Residents of large multi-family dwellings (5+ units) have lower natural
 11 gas consumption than residents of apartments in 2 – 4 unit buildings. Renters have lower
 12 consumption than do homeowners. And renters in multi-family dwellings have lower
 13 consumption than renters in single-family homes.

14
 15 **Q. DO THE UNDERLYING DEMOGRAPHICS IN PENNSYLVANIA PROVIDE**
 16 **SUPPORT FOR THE APPLICABILITY OF THESE DEPARTMENT OF**
 17 **ENERGY CONCLUSIONS TO PEOPLES?**

1 A. Yes. Two lines of inquiry support this conclusion. First, Schedule RDC-1 presents the
2 average income in Pennsylvania by the number of rooms in a housing structure, as well
3 as the average income in Pennsylvania by the number of bedrooms in a housing structure.
4 Schedule RDC-1 clearly shows that as housing units get larger in Pennsylvania, average
5 income increases.

6
7 There are two standard ways to compare the size of a housing unit when square footage is
8 not available. One way is to look at the number of rooms; the other way is to look at the
9 number of bedrooms. Both of these approaches document that lower-income households
10 live in smaller sized housing units. Schedule RDC-1 shows that:

- 11 ➤ While the average income of a Pennsylvania household living in a unit with one
12 room is \$40,399, the average income of a household living in an eight-room unit
13 is \$95,524. By the time a house gets to have nine rooms, the average income is
14 \$119,211.⁵
- 15
16 ➤ The same relationship holds true for housing size measured by the number of
17 bedrooms. While the average income for a Pennsylvania household living in a
18 unit with no bedrooms (known as an “efficiency unit”) is \$41,716, the average
19 income of a household living in a housing unit with three bedrooms is \$69,626;
20 the average income of a household living in a unit with five bedrooms is
21 \$136,317.

22
23 In both instances (number of rooms and number of bedrooms), the average income
24 increases as the size of the housing unit increases.

25
26 In addition to this data, Schedule RDC-2 presents a distribution of Pennsylvania
27 households by income and by the size of the housing unit in which they live, measuring

⁵ Housing units limited to those using natural gas service with housing occupants billed directly by Peoples.

1 housing unit size by the number of bedrooms in the unit.⁶ The data shows that a higher
2 proportion of lower-income households live in smaller housing units and a higher
3 proportion of higher income households live in larger housing units. For example, while
4 roughly 13% to 17% of households with income less than \$20,000 live in units with one
5 bedroom or less, less than two percent (2%) of households with incomes greater than
6 \$150,000 live in units that small. Conversely, while roughly 46% to 52% of households
7 with incomes of \$150,000 or more live in units with four or more bedrooms, only 11% to
8 12% of households with incomes less than \$30,000 do. Consistently, the percentage of
9 households in each of the higher income ranges declines as the number of bedrooms
10 declines. In Pennsylvania, higher income households clearly tend disproportionately to
11 live in larger homes than do lower income households.

12
13 **Q. HAS PEOPLES EVER UNDERTAKEN A STUDY TO CONSIDER THE**
14 **RELATIONSHIP BETWEEN HOUSEHOLD INCOME AND NATURAL GAS**
15 **USAGE?**

16 A. No. When asked to provide any reports or studies in its possession or control, whether or
17 not prepared by or for the Company, which assess the relationship between income and
18 consumption, Peoples responded that “there are no such studies.” (OCA-III-9).

19
20 **Q. IS A COMPARISON OF CAP CUSTOMERS TO NON-CAP CUSTOMERS A**
21 **SUFFICIENT WAY TO CONSIDER THE RELATIVE CONSUMPTION OF**
22 **LOW-INCOME AND NON-LOW-INCOME CUSTOMERS?**

⁶ A similar measurement could be made using the total number of rooms rather than the number of bedrooms.

1 A. No. As I document above, customers participating in CAP are a relatively small
2 proportion of either confirmed or estimated low-income customers on the Peoples
3 system. Moreover, the usage of CAP customers is not reflective of low-income
4 customers as a whole. In order to enroll in CAP, customers must have bills that exceed
5 an affordable percentage of income. If as a result of lower usage, in other words, a
6 customer has lower bills, that customer will not be a CAP participant. By design, CAP
7 customers include higher usage customers. The inclusion of these high usage CAP
8 customers in the “confirmed low-income” population skews the usage of the Peoples
9 confirmed low-income population upwards.

10

11 **Q. WHAT EMPIRICAL DATA LEADS YOU TO BELIEVE THAT THERE IS A**
12 **SIGNIFICANT LOW-INCOME POPULATION THAT WOULD NOT**
13 **PARTICIPATE IN CAP?**

14 A. In 2007, I was part of a team that performed a multi-sponsor, multi-state study of low-
15 income assistance programs around the nation. Pennsylvania was one of the states
16 studied. Among the things we found was that 25% of low-income households had bills
17 of less than \$500, while 50% had bills of less than \$1,000. Moreover, 26% of natural gas
18 customers in Pennsylvania had gas burdens of less than 5%, while an additional 25% had
19 burdens of more than 5% but less than 10%. These customers are unlikely to participate
20 in CAP. To examine a population of high use CAP participants does not provide an
21 appropriate basis for drawing conclusions about natural gas consumption for low-income
22 customers generally.

23

1 **Q. DO YOU HAVE ANY COMMENT ABOUT THE TOTALITY OF THE**
2 **INFORMATION YOU PRESENT ABOVE?**

3 A. Yes. The information presented by the RECS is important not only for each piece of data
4 standing alone, but is important because of how it fits together into a reasonably
5 explainable pattern. Total per-household residential natural gas consumption is driven
6 largely by the size of the housing unit. Smaller units have lower natural gas
7 consumption. Renters tend to live in smaller housing units, and we can see a
8 correspondingly lower natural gas consumption by renters. Households living in single-
9 family detached homes have larger housing units, and we can see a correspondingly
10 higher natural gas consumption. Households living in multi-family units have smaller
11 units and lower consumption. Lower incomes are associated with renter status, as well as
12 multi-family living. The conclusion that low-income households are also low use
13 households is not only empirically supported, but consistently explained.

14

15 **Q. HOW IS THIS DATA ON THE RELATIONSHIP BETWEEN INCOME AND**
16 **USAGE RELEVANT TO THE COMPANY'S PROPOSED CUSTOMER**
17 **CHARGE?**

18 A. The Company has proposed a significant fixed monthly customer charge in this base rate
19 case. As is documented above, the substantial increase in the fixed monthly customer
20 charge will disproportionately adversely affect low-use customers. Data supports the
21 conclusion that those low-use customers will also disproportionately be low-income
22 customers. As a result, the customer population having the greatest payment troubles
23 with which to begin will receive the largest rate increases. This impact not only

1 adversely affects the low-use, low-income customers, but also imposes greater costs that
2 will need to be passed through rates to all ratepayers.

3
4 **Part 2. CAP Cost Recovery.**

5 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
6 **TESTIMONY.**

7 A. In this section of my testimony, I review whether Peoples has proposed an appropriate
8 tariff through which to recover its universal service costs. I conclude that the Company's
9 CAP cost recovery should be adjusted to better account for a bad debt offset.

10
11 **Q. PLEASE EXPLAIN HOW THE OFFSET WORKS?**

12 A. The offset is applied to the incremental number of CAP participants which exceeds the
13 base number of participants experienced in the most recent period with actual, known
14 data. The offset reflects the extent to which low-income customers who do not
15 participate in CAP cause the utility to incur bad debt expense. That bad debt expense is
16 incorporated into rates in the base rate case. Having already incorporated those
17 uncollected dollars into rates, to the extent that these low-income customers move into
18 CAP, it would then be inappropriate to again collect those same dollars in the form of
19 CAP credits that are granted to CAP participants. To do that would be to double-collect
20 the same dollars. Neither the question of whether to impose an offset, nor the question of
21 what percentage that offset should be, is at issue in this proceeding. I accept the
22 Company's proposal. The only issue involves what number should be set as the base
23 CAP participation over which the CAP offset is applied.

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Q. WHAT ARE THE CURRENT AND PROPOSED BAD DEBT OFFSETS FOR PEOPLES AND FOR PEOPLES EQUITABLE?

A. Peoples Natural Gas has a current bad debt offset of 3.27% in its Universal Service cost recovery Rider. Peoples Equitable has a current bad debt offset of 12.0% in its Universal Service cost recovery Rider. Peoples proposes to combine those two Riders and to apply an offset of 2.49%. (Appendix D, Proposed Tariff, original page 68). The 2.49% is the percentage of residential write-off claimed by Peoples. (Exh. RAF-7).

Q. IS THAT PROPOSAL REASONABLE?

A. No. The bad debt write-off should reflect the difference in revenues actually written-off for residential customers and for low-income customers. Neither Peoples nor Peoples Equitable report that data. Instead, Peoples simply allocates its bad debt to low-income customers in the same proportion as low-income revenue is to total revenue. Accordingly, I have updated the existing bad debt set-off percentages into a combined number for both Peoples and Peoples-Equitable. The write-off amounts of Peoples and Peoples Equitable have changed over the past three years. The write-offs for Peoples have somewhat declined and the write-offs for Peoples Equitable have somewhat increased. I thus have allocated a portion of the bad debt write-off to each Peoples division based on the proportion that each contributes to total write-offs. I multiply that allocation percentage times the existing bad debt offsets to update and combine the two Companies. The bad debt offset I propose is 6.44%. This combined offset is higher than

1 the existing Peoples offset of 3.27% but is lower than the existing Peoples Equitable
2 offset of 12%. The calculation is set forth in Schedule RDC-3.

3
4 **Q. DOES THE PEOPLES PROPOSED BASE NUMBER OF CAP PARTICIPANTS**
5 **OVER WHICH THE BAD DEBT OFFSET IS APPLIED NEED TO BE**
6 **ADJUSTED?**

7 A. Yes. Peoples proposes to maintain its base CAP participation at 16,725 over which it
8 will apply the proposed bad debt offset. That base CAP participation, however, needs to
9 be updated and needs to be combined for the two companies. For the most recent twelve
10 month period available (March 2018 through February 2019), the average monthly CAP
11 participation rate was 13,784 for Peoples Equitable and was 18,476 for Peoples. (OCA-
12 III-13). To the extent that the two divisions reconcile their CAP costs separately, the
13 base CAP participation I recommend for Peoples Equitable is 13,800 and for Peoples
14 18,500. To the extent that the two divisions reconcile their combined CAP costs
15 together, the base participation rate should be 32,300 (13,800 + 18,500).

16
17 **Q. DO YOU HAVE A FINAL CONCERN ABOUT THE CAP COST RECOVERY**
18 **FOR PEOPLES?**

19 A. Yes. Peoples proposes to integrate its Universal Service Rider for both gas divisions
20 (Peoples, Equitable). The integration of the Rider should be accomplished in a fashion
21 that does not adversely affect either one of the divisions. The total universal service costs
22 should be incorporated together, collected, and disbursed such that it reflects a fair share
23 of universal service funding across the communities served.

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Part 3. Identifying “Confirmed Low-Income Customers.”

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I examine the way in which Peoples implements the Commission’s definition of a “confirmed low-income customer” for purposes of extending specific customer service protections. To the extent that the Company fails to comply with the PUC’s definition of “confirmed low-income customer,” the Company is also failing to extend the full set of protections such customers are entitled to receive. I recommend that the Company conform its practices to PUC regulations.

Q. UPON WHAT DO YOU BASE YOUR CONCLUSION THAT PEOPLES SHOULD IMPROVE THE IDENTIFICATION OF CONFIRMED LOW-INCOME CUSTOMERS?

A. I discuss in more detail below the process that Peoples uses to establish a customer as a “confirmed low-income” customer. I conclude that Peoples has significantly fallen short of confirming low-income customer status. Without establishing that a customer is a “confirmed low-income” customer, it is difficult for Peoples to enroll that customer as a CAP participant. It is also not possible to extend certain consumer protections that are available only to confirmed low-income customers.

1 **Q. PLEASE DESCRIBE HOW PEOPLES IDENTIFIES ITS “CONFIRMED LOW-**
2 **INCOME CUSTOMER” BASE?**

3 A. According to Peoples, “Confirmed low income is defined as participating in CAP and/or
4 having received LIHEAP.” (OCA-III-33). This limited definition of “confirmed low-income” is
5 used despite the fact that the Company routinely obtains income information from residential
6 customers.

7
8 **Q. DOES THIS PROCEDURE COMPLY WITH THE PUC’S DEFINITION OF**
9 **“CONFIRMED LOW-INCOME”?**

10 A. No. This process for identifying customers as a “confirmed low-income customer” does not
11 comply with the PUC’s regulations defining what a “confirmed low-income customer” is.
12 The PUC clearly defines a “confirmed low-income” customer in its natural gas
13 regulations as being “Accounts where the NGDC has obtained information that would
14 reasonably place the customer in a low-income designation. This information may
15 include receipt of LIHEAP funds, *self-certification by the customer, income source or*
16 *information obtained in § 56.97(b)* (relating to procedures upon rate-payer or occupant
17 contact prior to termination).” (emphasis added). (52 Pa Code §62.2).

18
19 Peoples should accept self-certification of low-income status for purposes of identifying a
20 “confirmed low-income customer.” Accepting customer-provided information that is
21 received in the normal operations of the utility is good practice. According to Peoples,
22 itself, “The following company procedures include steps for obtaining income
23 information and discussing services with low-income customers: Requests to start
24 residential service (New Customers as well as Existing Customers), Universal Service

1 Program Referrals, Termination of residential service (e.g., non-payment), and
2 Reconnection of residential service.” (OCA-III-32). According to Peoples:

3 Income, as well as household occupancy, information is gathered at several
4 points of customer contact to ensure the customer is fully aware of beneficial
5 services available to them. Circumstances that involve obtaining the
6 information include:

- 7
- 8 ○ Starting a relationship with the customer, such as the initial request
9 for natural gas service.
- 10
- 11 ○ Subsequent and ongoing contacts with the customer, including
12 customer consultations to determine affordable payment amounts as
13 well as available Universal Service programs.
- 14
- 15 ○ Continuing a relationship with the customer, such as additional
16 requests for natural gas service (concurrent service or transferring
17 service to a new location).
- 18
- 19 ○ Discussion of past due arrears and/or receipt of a Termination Notice
20 to determine options for affordable payments, such as a Payment
21 Arrangement or a Universal Service such as the Customer Assistance
22 Program as well as several Energy Assistance grants programs.
- 23

24 (OCA-III-30). Moreover, the Company states that “Income and Occupancy information
25 is recorded through the customer relationship management system and can easily be
26 viewed.” (OCA-III-31).

27

28 Each of these circumstances meets the PUC prescribed definition of a “confirmed low-
29 income” customer, one where Peoples “has obtained information that would reasonably
30 place the customer in a low-income designation.” The Peoples action to impose further
31 limitations on the PUC definition should be rejected. Instead, Peoples should be directed

1 to modify its tariffs and procedures, including staff training, to comply with the PUC
2 regulation.

3

4 **Q. WHY IS IT APPROPRIATE TO ADDRESS THIS FAILURE TO CONFIRM**
5 **LOW-INCOME CUSTOMER STATUS IN THIS RATE CASE?**

6 A. Extending low-income regulatory protections to all customers who are entitled to receive
7 such protections is an important element of customer service. It is thus reasonable to
8 examine whether these regulatory protections are being reasonably pursued.

9

10 **Part 4. Enrolling Income-Eligible Customers in CAP.**

11 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
12 **TESTIMONY.**

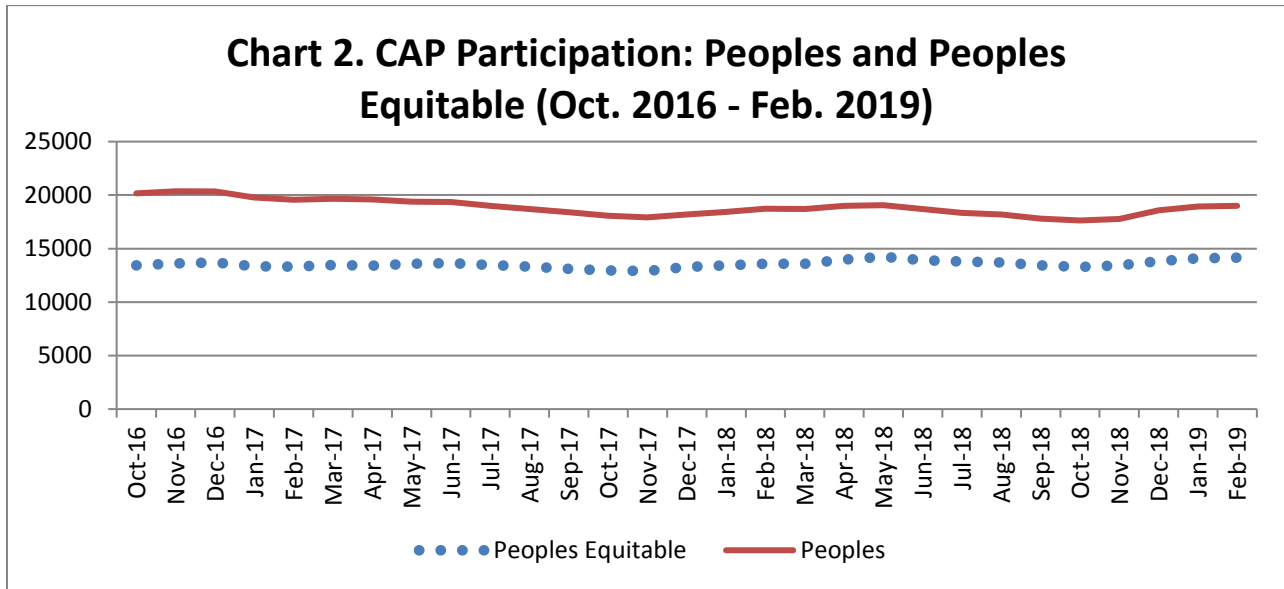
13 A. In this section of my testimony, I examine my concerns about whether Peoples is
14 adequately identifying CAP-eligible customers and enrolling those customers as
15 participants in the Company's CAP initiative. I conclude that Peoples is falling short in
16 the outreach and enrollment process.

17

18 **Q. UPON WHAT DO YOU BASE YOUR CONCLUSION THAT PEOPLES SHOULD**
19 **IMPROVE ITS ENROLLMENT OF CONFIRMED LOW-INCOME**
20 **CUSTOMERS INTO CAP?**

21 A. Chart 2 immediately below shows CAP participation rates for both Peoples and for
22 Peoples Equitable. While Peoples Equitable has had an almost steady participation rate,

1 participation in the Peoples CAP has seen a steady decline in the past 29 months (October
 2 2016 through February 2019).



3
 4 This declining enrollment has occurred despite the fact that, as discussed above, the
 5 percentage of low-income customers in arrears has remained steady. None of the trends
 6 in metrics relating to low-income payment difficulties either for Peoples or for Peoples
 7 Equitable are positive. While there was an uptick in collections performance in 2016,
 8 that uptick disappeared in 2017 when collections performance again deteriorated.
 9 Relative to 2015, disconnections were higher and reconnections were lower. Both the
 10 average dollars of low-income arrears were again increasing, as is the percentage of
 11 billings to confirmed low-income customers that are in arrears.

	Peoples			Peoples Equitable		
	2015	2016	2017	2015	2016	2017
Termination rate	3.4%	3.3%	4.2%	1.5% ⁷	2.5%	3.1%
Reconnection rate	70.8%	67.4%	60.3%	70.9%	65.1%	66.5%
Confirmed low-income count			60,077			44,267

⁷ Terminations were halted for a period during the time of a system conversion.

Average LI arrears	\$460.32	\$257.69	\$391.38	\$477.20	\$253.05	\$342.47
Pct LI billings in arrears	6.0%	3.7%	4.8%	9.4%	5.9%	6.7%

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The data from Peoples and Peoples Equitable shows that while Peoples had confirmed more than 60,000 low-income customers, it had a CAP participation of only 20,000. While Peoples Equitable had more than 44,000 confirmed low-income customers, it had a CAP participation of less than 13,500. Those enrollment figures are more disturbing given, as described immediately above, that CAP participation is one of only two ways in which Peoples/Equitable will confirm the low-income status of a customer.

Moreover, Peoples was receiving LIHEAP from a significant number of customers that it does not subsequently enroll in CAP. In 2015/2016, for example, 31,066 Peoples customers received LIHEAP (OCA-III-4), while Peoples had an October 2016 CAP participation rate of only 20,172 (OCA-III-13). In 2016/2017, 30,020 Peoples customers received LIHEAP (OCA-III-4), while Peoples had an October 2017 CAP participation rate of only 18,079 (OCA-III-13). In 2017/2018, LIHEAP was received for the Peoples entity as a whole. While 33,110 Peoples customers received LIHEAP, Peoples/Peoples Equitable had a combined CAP enrollment in October 2018 of only 30,914. (OCA-III-13).

Q. WHAT DO YOU CONCLUDE?

A. The low rate of Peoples in enrolling its low-income customers in CAP not only harms the Company’s low-income customers, it harms all other ratepayers as well. CAP is designed as a cost-effective alternative to traditional credit and collection techniques.

1 Peoples is consistently foregoing the use of this important tool to use in responding to
2 inability-to-pay.

3
4 **Q. WHAT DO YOU RECOMMEND?**

5 A. I recommend that Peoples be required by the PUC to prepare, after consultation with low-
6 income stakeholders, including community-based organizations delivering low-income
7 services, a specific plan detailing the means of outreach to, and intake for, confirmed
8 low-income customers in arrears. In addition, I recommend that Peoples adopt a
9 procedure under which it will not disconnect service to a confirmed low-income customer
10 for nonpayment without first offering to enroll that customer in CAP and providing a
11 Plain English notice of that offer along with a Plain English description of the arrearage
12 forgiveness benefits available through CAP.

13
14 **Part 5. Improving Multiple Aspects of Customer Service.**

15 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
16 **TESTIMONY.**

17 A. In this section of my testimony, I examine two ways in which Peoples can and should
18 improve its delivery of quality customer service. The two aspects of customer service I
19 examine are enrollment of customers in Budget Billings; and the enrollment of customers
20 in Peoples' third-party notification program. These improvements in the delivery of
21 reasonably adequate customer service do not necessarily apply only to confirmed low-
22 income customers.

A. Improving Budget Billing.

1
2 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
3 **TESTIMONY.**

4 A. In this section of my testimony, I examine the reasonableness of Company restrictions on
5 the availability of its Budget Billing for residential customers. I recommend two
6 modifications to the Company's Budget Billing. Through Budget Billing, residential
7 customers receive levelized monthly bills. The process, which is available for all
8 residential customers, not just low-income, allows customers to time-shift some of the
9 high cost heating month bills into lower cost months.

10
11 Three advantages arise from levelized Budget Billing. First, customers avoid the
12 possibility that, while their natural gas bills would be affordable on an annual basis,
13 specific months with high bills would exceed available monthly income and would thus
14 be unaffordable in that month. Once the customer gets behind, he or she may have
15 difficulties in catching up. Second, a levelized Budget Billing plan helps a customer to
16 minimize his or her total bills. If a customer misses payments in a high cost month,
17 future month bills would include not only the current bill for service and unpaid prior
18 balance, but would include, also, all late payment charges on the unpaid balance. Finally,
19 levelized Budget Billing allows customers to plan their monthly utility bill payments
20 relative to their personal budget. The ability of customers to pay their monthly bill would
21 not be contingent on the vagaries of severe weather that might unexpectedly drive a
22 seasonal bill out of financial reach.
23

1 **Q. IS BUDGET BILLING A UNIVERSAL SERVICE PROGRAM?**

2 A. While Budget Billing offers particular advantages to low-income customers given the
3 limited resources low-income customers have available to pay bills, it is not exclusively a
4 program directed toward low-income customers. The payment problems of low-income
5 customers tend to be associated with a chronic mismatch of expenses and the resources
6 available to pay those expenses. Budget Billing is directed toward customers who have a
7 marginal ability to pay, which ability to pay is compromised by seasonal variations in the
8 size of bills. Budget Billing, in other words, would be advantageous to low-income
9 customers. It would also be advantageous to the near-poor as well.

10

11 In addition to the advantages of Budget Billing from the perspective of the customer,
12 Budget Billing offers advantages to the utility as well. Budget Billing would help
13 Peoples stabilize its receipt of revenue over the course of the year, thus ameliorating any
14 need on the part of the Company to move more of its billing into fixed monthly charges
15 to accomplish that same end.

16

17 **Q. HOW MANY CUSTOMERS DOES THE COMPANY MAINTAIN ON**
18 **LEVELIZED BUDGET BILLING?**

19 A. According to the Company, both Peoples and Peoples Equitable have a substantial and
20 slightly growing population of Budget Billing customers. For the period October 2016
21 through February 2019, Peoples had a monthly average of 106,897 Budget Billing

1 customers, while Equitable had a monthly average of 81,548. (OCA-III-21). The twelve
 2 month averages since October 2016 are set forth in the Table immediately below.⁸

	Peoples	Peoples Equitable
Oct 2016 – Sept 2017	102,307	81,548
Oct 2017 – Sept 2018	109,393	84,733
Oct 2018 – Feb 2019	111,920	85,424

3

4 **Q. DO YOU HAVE REASON TO BELIEVE THAT PEOPLES CUSTOMERS**
 5 **WOULD BENEFIT FROM BUDGET BILLING?**

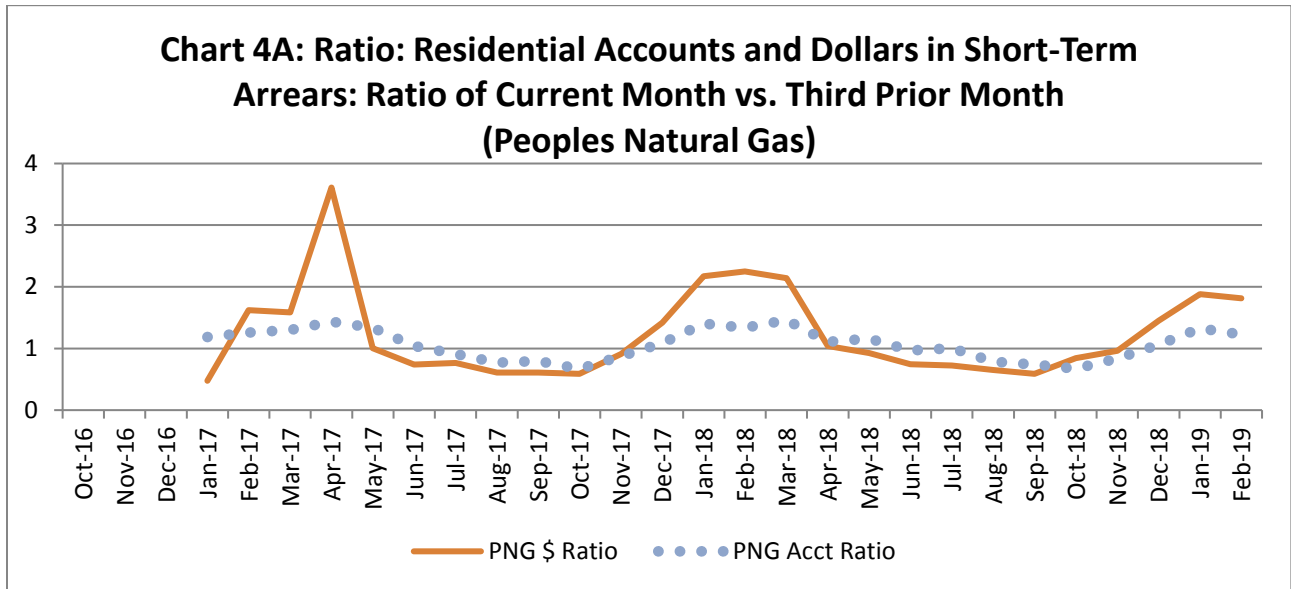
6 A. Yes. I have examined the question of whether Peoples customers and Equitable
 7 customers experience changes in arrearages during the high cost months. For a natural
 8 gas company, a “high cost month” will most likely be a cold weather month. In Chart
 9 4A, I present a comparison of accounts in arrears for residential customers as a whole to
 10 dollars in arrears for those customers for Peoples.

11

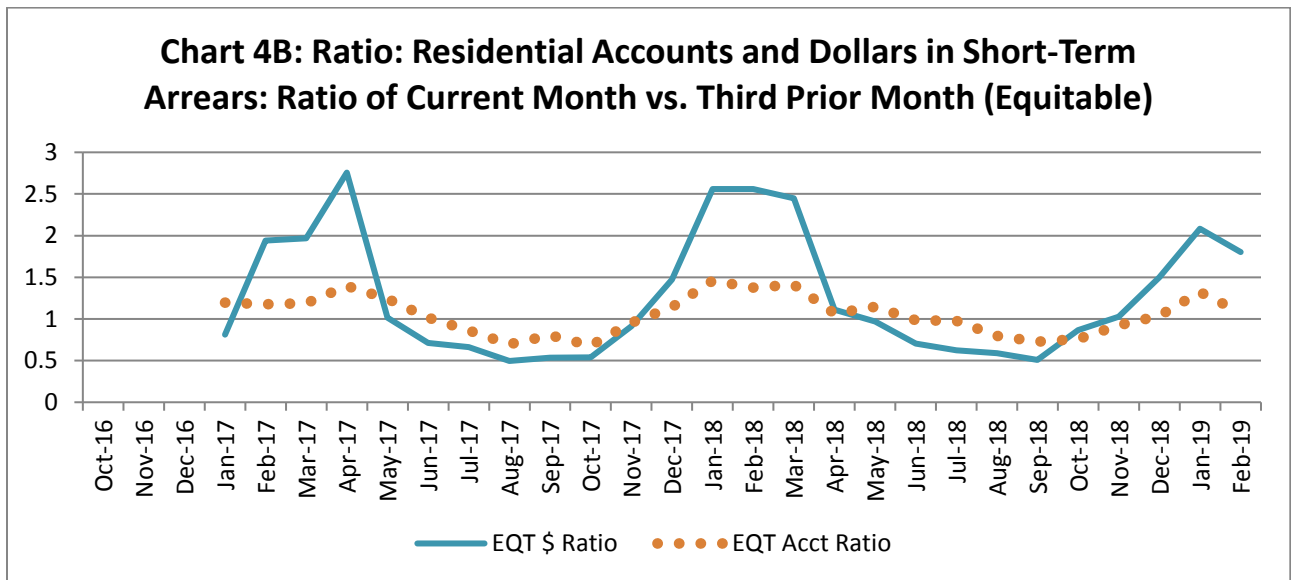
12 I limit my analysis to arrears that are from 31 to 60 days past-due. These short-term
 13 arrearages will indicate changes in short-term payment patterns. If a high cost month is
 14 associated with increased nonpayment, which nonpayment would not exist in the absence
 15 of the higher costs, it will be seen in the short-term arrearages. In Charts 4A and 4B, I
 16 index the number of accounts in arrears to the number of accounts in arrears from the
 17 third prior month; I make the same calculation for the dollars of arrears. For example, if
 18 the number of February accounts in arrears is greater than the number of December
 19 accounts in arrears, the index will be greater than 1.0. If the dollars of August arrears are

⁸ 2018 – 2019 includes only the available five months for that period.

1 higher than the dollars of June arrears, the index will be greater than 1.0. I prepare this
 2 index so that I can track variations that can be attributed to seasonal changes in bills.



3
 4 In Chart 4B I present the same comparison for Equitable.



5
 6 Charts 4A and 4B show the advantage that each company would gain from increasing
 7 levelized Budget Billing to its confirmed low-income customers. The index of accounts
 8 in arrears (dotted line) remains much more constant over the course of the year. The
 9 number of accounts in short-term arrears in any particular month, in other words, does

1 not increase to the same extent as does the number of dollars in arrears in prior months.
2 The peaks in dollars of arrears (i.e., when the balances are higher than in prior months)
3 clearly occur in the high cost months (e.g., December through March). To the extent that
4 the Company could levelize these seasonal bills through levelized Budget Billing, it
5 could mitigate those peaks.
6

7 **Q. WHAT DO YOU CONCLUDE?**

8 A. To the extent that the Company could increase its Budget Billing participation, and
9 levelize payments over the course of the year, the Company would be able to reduce the
10 peaks in short-term arrearages which it experiences.
11

12 **Q. DO YOU HAVE ANY OBSERVATIONS ABOUT THE MANNER IN WHICH**
13 **THE COMPANY OFFERS LEVELIZED BUDGET BILLING TO ITS**
14 **RESIDENTIAL CUSTOMERS?**

15 A. Yes. The Company states that “Before setting up on a Budget plan, the account cannot
16 have arrears of 30 days or more.” (OCA-III-19, Attachment). While this policy allows
17 for someone having arrears of less than 30 days to enroll in Budget Billing, this rarely
18 occurs. For the period October 2016 through February 2019, Peoples had an average
19 monthly Budget Billing enrollment of 106,897 residential accounts, with a monthly
20 average of only 318 having entered Budget Billing with an arrears (0.0297%). (OCA-III-
21 20). During the same time period, Equitable had an average monthly Budget Billing
22 enrollment of 81,534 residential accounts, with a monthly average of only 207 having
23 entered Budget Billing with an arrears (0.0248%). (OCA-III-20). As the Table below

1 shows, this pattern of denying access to Budget Billing for accounts in arrears has carried
 2 forward for several years.

	Peoples		Peoples Equitable	
	Total BB	BB Having Entered with Arrears	Total BB	BB Having Entered with Arrears
Oct 2016 – Sept 2017	102,307	230	81,548	160
Oct 2017 – Sept 2018	109,393	407	84,733	248
Oct 2018 – Feb 2019	111,920	313	85,424	225

3

4 **Q. DO YOU HAVE REASON TO BELIEVE THAT BUDGET BILLING HELPS**
 5 **CUSTOMERS IMPROVE THEIR BILL PAYMENT?**

6 A. Yes. Placing a customer on Budget Billing could be expected to increase payments from
 7 customers in arrears. As discussed above, Peoples had an average monthly Budget
 8 Billing participation rate of 106,897 residential customers for the months October 2016
 9 through February 2019. During that 29 month period, Peoples removed a *total* of 30
 10 customers for nonpayment, while Equitable removed a *total* of only 35. (OCA-III-21).
 11 The nonpayment rate sufficient to merit removal from the program amongst the Budget
 12 Billing customers of either company, in other words, was nearly non-existent. It’s not as
 13 though no-one left the Budget Billing program. During the same time period, 38,177
 14 Peoples customers asked to be removed from Budget Billing, while 34,888 Equitable
 15 customers asked to be removed. (OCA-III-21).

16

17 **Q. WHAT DO YOU CONCLUDE?**

18 A. I conclude that the Peoples policy of denying access to Budget Billing to customers who
 19 have arrears of more than 30-days in age should be eliminated. If nothing else, Charts 4A
 20 and 4B above demonstrate that arrears in the 30 to 60 day age bracket are not long-term

1 arrears. Instead, these arrearages demonstrate precisely the short-term, seasonal
 2 fluctuation that could be eliminated, or at least mitigated, through Budget Billing. Upon
 3 request to enter into Budget Billing, a customer in arrears should be placed on Budget
 4 Billing while spreading their arrears over a period consistent with the PUC regulation
 5 applicable to the individual customer.

6
 7 **B. Expanding Third Party Notification.**

8 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
 9 **TESTIMONY.**

10 A. The purpose of this section of my testimony is to assess whether there are reasonable
 11 mechanisms available to the Company to help address, and mitigate, the arrearages that
 12 are carried by its confirmed low-income population. I also assess whether there are
 13 mechanisms available to address exits from the Company’s CAP when those exits are not
 14 related to the lack of income-eligibility. Peoples has room for improvement in how it
 15 responds to the arrearages of its confirmed low-income customers. Arrearage data is set
 16 forth in the Table below

2017 ⁹	Peoples	Peoples Equitable
Percent LI accts in arrears	14.3%	15.1%
Pct accts in arrears no pay plan	8.0%	8.8%
Pct accts in arrears with pay plan	6.3%	6.3%
Termination rate	4.8%	6.7%

17
 18 What is striking about this data is that Peoples disconnects service to confirmed low-
 19 income customers at a rate that is almost equal to the rate at which it enters into payment

⁹ BCS 2017 annual report on collections performance and universal service programs.

1 agreements (4.8% termination rate; 6.3% payment agreement rate). Peoples Equitable
2 disconnects service at a rate that is *higher* than the rate at which it enters into payment
3 agreements (6.7% termination rate; 6.3% payment agreement rate). Peoples has done no
4 research on why customers do not make contact with the utility when they are given
5 notice they should do so in order to avoid a disconnection for nonpayment. (OCA-III-36).

6
7 Facilitating contact with the utility in order to enter into a reasonable payment agreement
8 would help Peoples Gas address some of its more troublesome arrears. One mechanism
9 the PUC's Bureau of Consumer Services ("BCS") has developed to assess arrears is what
10 BCS calls its "Bills Behind" statistic. Through Bills Behind, the analyst divides an
11 arrearage by the average monthly bill. One account that is more "bills behind" than
12 another account, even if the two accounts have an identical bill balance, is deemed to
13 represent more of a risk. For example, two accounts with identical \$300 unpaid balances
14 represent different risks if one of those accounts has an average bill of \$100 (3 bills
15 behind) and the other account has an average bill of \$60 (5 bills behind).

16
17 Using this Bills Behind statistic, it is evident that the low-income payment agreements for
18 Peoples and Peoples Equitable both address more problematic arrears. The Table below
19 presents the data. Using data from the most recent (2017) BCS annual report on
20 collections performance and universal service programs, it is possible to determine that
21 the average low-income customer with arrears on agreement has an unpaid balance of
22 5.02 Bills Behind for Peoples; the average Peoples Equitable low-income customer with
23 an arrears subject to an agreement is 7.20 Bills Behind. Both companies find that the

1 average Bills Behind for their low-income arrears on agreement are substantially higher
 2 than the Bills Behind for their low-income arrears not subject to agreement. Both
 3 companies would benefit from having more high arrearages on agreement.

	PNG	EQT
Billings	\$69,807,213	\$34,188,902
Customers	60,077	44,627
Average annual bill	\$1,162	\$766
Average monthly bill	\$97	\$64
Average arrears no agreement	\$317.02	\$258.30
Bills behind no agreement	3.3	4.0
Avg arrears on agreement	\$486.05	\$459.77
Bills behind on agreement	5.02	7.20

4

5 **Q. ASIDE FROM ADDRESSING ARREARAGES, ARE THERE INSTANCES**
 6 **WHERE THE FAILURE OF A CUSTOMER TO MAKE CONTACT WITH THE**
 7 **UTILITY WORKS TO THE DETRIMENT OF THE CUSTOMER?**

8 A. Yes. The failure of a customer to make contact with the utility also works to the
 9 detriment of a customer when the customer is removed from CAP for a failure to
 10 recertify (or a failure to provide documentation). From October 2016 through March
 11 2019, 38,564 customers exited from CAP. (OCA-III-14). By a small amount, the number
 12 of customers exiting CAP for having received a final bill (18,806) (presumably for
 13 having moved) exceeded the number of customers exiting CAP for having failed to
 14 provide documentation (16,543). It is the second group of exits that might well be
 15 prevented. A failure to provide documentation represents a failure of a customer to
 16 recertify. This exit reason is unrelated to whether the customer is income-eligible. The
 17 Company reports that over the same time period (October 2016 through March 2019),

1 fewer than 2,000 CAP participants exited the program for having income that exceeds the
2 Plan's requirements. (OCA-III-14).

3
4 **Q. GIVEN THAT THE COMPANY DOES NOT HAVE INFORMATION ON WHY**
5 **CUSTOMERS DO NOT RESPOND TO NOTICES ASKING THEM TO**
6 **CONTACT THE UTILITY TO PREVENT A DISCONNECTION, CAN YOU**
7 **PROVIDE INSIGHTS INTO WHY SUCH CONTACT DOES NOT OCCUR?**

8 A. Yes. In research that is directly analogous to the utility context, Harvard University's
9 Joint Center for Housing Studies reported about mortgage nonpayments:

10 In all of the cases of foreclosure alternatives – whether for home retention or
11 when the borrower voluntary gives up the home – the borrower must talk
12 with the servicer. Loans that self-cure quickly without intervention from the
13 servicer are not of much concern, but a borrower that has no contact with
14 their servicer is missing out on the many effective options available for
15 foreclosure avoidance – hurting not only themselves but also causing investor
16 costs to rise.

17
18 While contacting the financial institution that services your mortgage may
19 seem a simple task to many, a 2005 ground breaking survey of delinquent
20 Freddie Mac borrowers by Roper and Freddie Mac found many substantial
21 barriers to this important communication. Specifically, the survey revealed
22 that on the effectiveness of servicer outreach, 75 percent of the delinquent
23 borrowers who responded to the survey said they remembered being
24 contacted by their loan servicer by letter or phone. However, a substantial
25 percentage gave a variety of reasons for neglecting to follow-up with their
26 servicers to discuss workout options. Among them were: 28 percent who said
27 there was no reason to talk to their servicers or that their servicers could not
28 help them; 17 percent who said they could take care of their payment
29 problems without any help; and 7 percent who said they didn't call because
30 they didn't have enough money to make the payment. Another 6 percent cited

1 embarrassment, 5 percent didn't respond out of fear and another 5 percent
2 said they didn't know whom to call.¹⁰
3

4 **Q. IS THIS RESEARCH CONSISTENT WITH OTHER RESEARCH IN**
5 **WHICH YOU HAVE ENGAGED?**

6 A. Yes. In research I undertook for the federal LIHEAP office, I examined the
7 impact of shutoff notices on low-income customers.¹¹ I found that:

8 the range of negative options available to a consumer facing unaffordable
9 home energy bills far outstrips the range of constructive options available to
10 such a low-income consumer. The range of 'negative' options available to
11 consumers can be further classified into two categories. Some options
12 'merely' represent a significant degradation in a low-income consumer's
13 quality of life. Other options are counter-productive. Not only do they not
14 solve the consumer's inability-to-pay problem, they affirmatively contribute
15 to or exacerbate that problem.

16
17 My findings continued on to state:

18 Many payment practices not only fail to address a consumer's inability-to-pay
19 problem, but they are actually counter-productive. To the extent that a low-
20 income consumer borrows money to pay current bills, for example, that
21 consumer will face current bills *plus* additional debt service obligations at
22 some point in the future.

23
24 One of the most common counter-productive actions reported for low-income
25 consumers involves the choice to forego the payment of other bills to free up
26 cash to pay utility bills. The foregone bills reported for low-income
27 consumers include:

- 28 ❖ Failing to pay the electric bill in order to pay the heating bill;
- 29 ❖ Using rent money to pay for utilities;
- 30 ❖ Foregoing payment of other bills (*e.g.*, water/sewer, car payments,
31 auto or home insurance) to pay for utilities.

¹⁰ Amy Crews Cutts and William Merrill (March 2008). *Interventions in Mortgage Default: Policies and Practices to Prevent Home Loss and Lower Costs at 9 – 10*, Joint Center for Housing Studies, Harvard University (Cambridge: MA).

¹¹ Colton (1999). *Measuring LIHEAP's Results: Responding to Home Energy Unaffordability*.

* * *

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2
3 In most instances, to the extent that a consumer forgoes payment of a current
4 bill, that consumer will face increased payments at some point in the future.
5 Since the consumer will eventually be called upon to pay current bills *plus*
6 the arrears, "foregone" expenditures tend not to be "foregone" at all. If a
7 person skips a monthly rent payment or a monthly car payment to pay a
8 utility bill, the true effect of this customer action is simply to borrow against
9 future income. At some point, the current month's utility bill will need to be
10 paid in addition to both current and past due rent or car payments.
11

12 Another type of counter-productive action involves increasing the
13 indebtedness of the household. Borrowing money is one of the most
14 commonly reported mechanisms used to pay unaffordable home energy bills,
15 including:
16

- 17 ❖ Borrowing from friends and/or family;
- 18 ❖ Borrowing from a loan company;
- 19 ❖ Purchasing fuel, food, or medicine on credit cards.
20

21 Money that is borrowed, of course, must someday be repaid. Borrowing
22 money to pay a utility bill simply substitutes one debt for another. Borrowing
23 defers unaffordability problems; it does not address them. In this respect,
24 getting advances on pay checks is simply one type of borrowing. Instead of
25 borrowing from a third party, the consumer is borrowing against his or her
26 own future income. Nonetheless, the advance is a debt that will need to be
27 repaid at some point in the future (as work is performed with no current
28 compensation).
29

30 My research on responses to bill nonpayment found that there are, indeed, "constructive
31 responses" to bill unaffordability. Pursuing usage reduction strategies, budget billing,
32 and taking household actions to reduce expenses and increase income are all constructive
33 responses to nonpayment. However, I found:

34 All too frequently, the customer is faced with an immediate need (*i.e.*, bill
35 payment by a date certain) with the available constructive responses to an
36 inability-to-pay unable to deliver assistance either in the form, the time
37 period, or the magnitude necessary to meet that need. Given the immediate

1 consequences of failing to address the short-term nonpayment crisis, the
2 customer is pushed into the negative actions identified in this research.

3
4 Getting customers in contact with the utility, in other word, will benefit customers not
5 only in helping them retire arrears, but in helping them avoid taking actions that are
6 counter-productive when they incur arrearages.

7
8 **Q. WHAT DO YOU RECOMMEND THE COMPANY PURSUE IN**
9 **RESPONSE TO THE TRENDS YOU IDENTIFY IMMEDIATELY**
10 **ABOVE?**

11 A. In response to these trends, I recommend that the Company seek to increase the role of
12 community-based organizations through an expanded use of the PUC's Third Party
13 Notification program.

14
15 **Q. PLEASE PROVIDE A SHORT DESCRIPTION OF THE "THIRD PARTY**
16 **NOTIFICATION PROGRAM" TO WHICH YOU REFER.**

17 A. The Pennsylvania PUC has promulgated a Third Party Notification program, set forth in
18 Section 56.131. Pursuant to that regulation, "[e]ach public utility shall permit its
19 customers to designate a consenting individual or agency which is to be sent, by the
20 public utility, a duplicate copy of reminder notices, past due notices, delinquent account
21 notices or termination notices of whatever kind issued by that public utility. When
22 contact with a third party is made, the public utility shall advise the third party of the
23 pending action and the efforts which shall be taken to avoid termination."

24

1 **Q. HOW HAS PEOPLES IMPLEMENTED THE PROVISIONS OF SECTION**
2 **56.131?**

3 A. Peoples had adopted no tariff provision to implement Section 56.131. Moreover, at
4 present, Peoples Natural Gas has only 3,037 customers enrolled in its Third Party
5 Notification program (OCA-III-26), roughly 1.1% of its total residential customer base.
6 Peoples has undertaken no additional efforts since 2015 to enroll additional customers in
7 its Third Party Notification program. (OCA-III-27).

8

9 **Q. WHAT DO YOU RECOMMEND?**

10 A. Peoples should promote the use of CBOs as part of its Third Party Notification program.
11 Several reasons support this conclusion.

12 1) First, CBOs are more likely to have staff specifically trained in, and skilled
13 with, Company processes and procedures.

14 2) Second, research by the National Regulatory Research Institute (“NRRI”),
15 when NRRI was the research arm of the National Association of Regulatory
16 Utility Commissioners (“NARUC”), found that entire sub-populations of
17 residential customers in payment trouble rely more on trusted community
18 organizations for advice and assistance in responding to nonpayment than on
19 either friends/family or on the utility itself.¹² Peoples should take advantage
20 of these community-based partnerships.

21 3) Third, in research that I did for the Water Research Foundation, the research
22 arm of the American Water Works Association (“AWWA”), on “hard to
23 reach” customers, I have repeatedly heard that enlisting community-based

¹² NRRI (April 2003). Where Customers go for Help Paying Utility Bills.

1 partners is one of the most critical steps in reaching these persons.¹³ Peoples
2 should also take advantage of this information.

3 Finally, having customers work with trained staff of CBOs is more likely to result in
4 outcomes that address the long-term needs of customers.

5
6 **Q. IS THERE A SECOND OBSERVATION YOU MAKE ABOUT THE**
7 **COMPANY’S THIRD PARTY NOTIFICATION PROCESSES?**

8 A. Yes. I recommend two process changes by Peoples. First, I recommend that Third Party
9 Notice authorization forms be made widely available through non-utility access points.
10 For example, the same CBOs that serve as access points for enrolling in CAP, or to apply
11 for LIHEAP or hardship grants, should not only be allowed, but should be encouraged, to
12 maintain their own inventory of Third Party Notification authorization forms.

13
14 Second, the Company should authorize and encourage CBOs to incorporate Third Party
15 Notification authorizations into applications for other assistance (e.g., CAP, hardship
16 grants). A customer need not provide such authorization at that time, but should be
17 allowed (and encouraged) to do so at the same time the customer is otherwise working
18 with the CBO to address utility-related bill payment assistance, *before* a disconnection
19 notice is issued.

20
21 The PUC regulation regarding Third Party Notification enrollment provides that each
22 utility is “to make available a standard enrollment form. . .” (52 Pa. Code § 131(4)). The

¹³ Perhaps the best study I have read in the past 25 years on how to reach hard-to-reach customers was the following: Natasha Cortas, et al. (2009). *Engaging Hard to Reach Families and Children*, Australia Department of Families, Housing, Community Services and Indigenous Affairs: New South Wales.

1 PUC regulation does *not* provide that the utility may limit the “availability” only to
2 contact with the utility, itself. Making such standard enrollment forms “available”
3 through their distribution to, and use by, CBOs who otherwise work with low-income
4 customers is entirely consistent with the language of the Regulation.

5
6 Finally, Third Party Notifications should be available for a wide range of Peoples actions
7 that will affect the well-being of the Company and the customer. The PUC’s regulation
8 states that:

9 each public utility shall permit its customers to designate a consenting
10 individual or agency which is to be sent, by the public utility, *a duplicate*
11 *copy of reminder notices, past due notices, delinquent account notices or*
12 *termination notices of whatever kind* issued by that public utility. When
13 contact with a third party is made, the public utility shall advise the third
14 party of the pending action and the efforts which shall be taken to avoid
15 termination.

16
17 52 Pa. Code § 56.131 (emphasis added). The Regulation clearly places a disjunctive
18 “or” in front of the phrase “termination notices of whatever kind.” By its explicit terms,
19 the Regulation extends also to “reminder notices, past due notices, delinquent account
20 notices” and other notices of whatever kind.

21
22 Moreover, increasing Third Party Notification would not only address nonpayment, but
23 would also help address the problem posed to Peoples by CAP customers who do not
24 recertify. Accordingly, I recommend that Peoples broaden its use of Third Party
25 Notifications to the full extent allowed by the PUC’s regulation. A customer should be
26 allowed to authorize a Third Party Notification for any collection-related or program
27 participation-related notice otherwise issued to the customer.

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Q. CAN YOU SUMMARIZE?

A. Use of the Third Party Notification Program should be expanded by Peoples. The Third Party Notification program gives added protection against utility shutoffs. The program helps protect customers who may not understand the company’s practices. The Third Party Notification allows someone in addition to the customer to be made aware of an important problem and that the additional party can provide advice or assistance.

Whether due to age, limited English proficiency, education, disability status, or socio-economic status, the Third Party Notification program provides added protection to both the Company and the customer. The Commission’s own regulations recognize the role of community-based organizations (“CBOs”) in the Third Party Notification process (see e.g., 52 Pa. Code §56.131(3)). A church, community action agency, or other CBO may be even better qualified than a “family member or close friend” to provide advice and assistance.

Part 6. The Peoples Proposal to Incorporate Third Party Payment Processing Fees into Revenue Requirement.

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I examine the proposal to incorporate third party payment processing fees into revenue requirement. Company witness Andrew Wachter states that “The Company is proposing to pay all costs associated with customer payments directly to its service providers and recover such costs from all customers via base rates rather than a customer-paid transaction cost.” (Peoples St. 3, at 26).

1

2 **Q. HAS PEOPLES GAS SOUGHT TO JUSTIFY ITS PROPOSAL AS A MEANS TO**
3 **IMPROVE THE BILL PAYMENT PATTERNS OF LOW-INCOME**
4 **CUSTOMERS?**

5 A. Yes. In response to discovery, Peoples stated:

6 Some customers prefer to pay by debit or credit card, while others prefer
7 walk-in payments. By removing the fees associated with these payment
8 transactions, the Company is encouraging payment by allowing customers to
9 pay in the way that is most convenient and easy for them without incurring an
10 additional fee. A fee, as well as perceived inconvenience of other payment
11 channels, could be a barrier to payment. Thus, removing the fee will remove
12 a potential barrier to payment. A fee for payment would have more of an
13 impact on someone with limited means than other customers. This is
14 especially helpful for those with limited means, as it reduces the overall
15 amount they have to pay for their gas service, makes it more convenient for
16 them to pay their bill and thus makes all channels appealing to customers
17 with limited means whereas in the past that fee may have made this channel
18 less appealing.

19

20 (OCA-VIII-7). The Peoples response is consistent with my experience over 40+ years of
21 working with low-income customers. I find the explanation provided by the Company to
22 be consistent with some of the barriers that I have found in my career in working with
23 payment-troubled customers.

24

25 **Q. CAN YOU PROVIDE ADDITIONAL INSIGHTS INTO BILL PAYMENT**
26 **OPTIONS AVAILABLE TO LOW-INCOME HOUSEHOLDS?**

27 A. Yes, I can provide information with respect to the use of credit cards in particular. I do
28 not have specific information about credit card use by the low-income customers of
29 Peoples in paying their natural gas bills. However, recent research “provides a glimpse

1 of the role that credit cards play in the financial life of [Low and Moderate Income]
2 households.” The research concluded that “the data show that credit cards are now a
3 major part of the economic life of the poorest U.S. households.”¹⁴ The research reports
4 that credit card companies have tailored their fees, and their interest rates, to reach low-
5 income customers.¹⁵ I conclude that given the high fees otherwise imposed by the credit
6 card companies on low- and moderate-income (“LMI”) households, it is beneficial to
7 those LMI customers to be able to avoid the transaction fees heretofore required to use
8 such credit cards to pay utility bills.

9
10 Moreover, a recent report by the U.S. Consumer Financial Protection Bureau (“CFPB”)
11 reports that one way for low-income customers to become “credit visible” is through the
12 use of credit cards. While the over-use of credit cards will make “credit visibility” a
13 negative credit factor, the proper use of credit cards helps low-income households to
14 establish a beneficial credit record.¹⁶ The Peoples Gas proposal to incorporate the
15 transaction fees for using such bill payment mechanisms helps to eliminate one more
16 barrier to establishing such a beneficial credit record.

¹⁴ Ronald Mann (undated). Patterns of Credit Card Use among Low and Moderate Income Households. Columbia University Law School: New York (NY).

¹⁵ Whether that is a “good” or a “bad” result is not at issue in this proceeding. Mann reports: “Looking at the lowest quintile alone – with income below \$23,000 – 31% of the households are carrying credit card debt. Among those that carry credit card debt, half have debt equal to 10% of their income and a quarter have debt equal to 25% of their income (all before making mortgage payments, car payments, child support payments and the like). As I discuss, the process of repaying that debt typically will involve high interest rates and considerable fees. By comparison, among the middle class borrowers who are so widely bemoaned for their rampant spending and over-indebtedness, the median debt share is only 5% and only a quarter have debt that exceeds 10% of their incomes. By any yardstick, we must acknowledge that credit card use among poor households has created a debt overhang that many households will bear for years, if not decades.” Mann, at 24.

¹⁶ Breevort, Kenneth and Michelle Kambara (2017). CFPB Data Point: Becoming Credit Visible.

1 **Q. WHAT DO YOU CONCLUDE?**

2 A. I conclude that the Peoples proposal to incorporate the third party payment processing
3 fees into revenue requirement is a reasonable proposal. This proposal will likely benefit
4 rather than harm low- and moderate income households. The Company proposal should
5 be approved.

6

7 **Part 7. The Peoples Customer Satisfaction Surveys do Not Support a Finding of Excellence**
8 **in Customer Service.**

9

10 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
11 **TESTIMONY.**

12 A. In this section of my testimony, I review the testimony of Morgan O'Brien where he
13 asserts that Peoples Natural Gas has consistently demonstrated excellence in customer
14 service. (Peoples St. 1, at 11 – 15). I find that the "customer satisfaction" surveys that
15 Mr. O'Brien cites fail to support the broad conclusions he reaches. I also find that the
16 Company demonstrates shortcomings in other customer service respects.

17

18 **Q. PLEASE EXPLAIN THE CUSTOMER SATISFACTION SURVEYS YOU HAVE**
19 **REVIEWED FOR THIS PROCEEDING.**

20 A. In response to discovery, Peoples Natural Gas provided (for both itself and for Equitable)
21 the customer satisfaction surveys it has had prepared for it for each year 2014 to present.
22 (OCA-III-39). I conclude that those surveys do not support a finding of overall
23 excellence in customer service as asserted by Mr. O'Brien.

24

1 **Q. PLEASE IDENTIFY WHAT SHORTCOMINGS YOU FIND IN THE PEOPLES**
2 **SURVEYS.**

3 A. In reviewing those surveys, I find first that the Company does not engage in point-of-
4 contact surveys. A point-of-contact survey, sometimes referred to as a “moment of truth”
5 customer satisfaction survey, directs customer satisfaction questions specifically to
6 customers who have contacted the utility for a specific purpose. A purpose might be to
7 prevent the disconnection of service, to negotiate a deferred payment arrangement, or to
8 assess the customer’s “creditworthiness” (or lack thereof). In these point-of-contact
9 surveys, unlike the generic questions contained in the Peoples survey about “overall
10 satisfaction,” inquiries into specific elements of customer service can be pursued.
11 Questions might involve “did the Company staff listen to what you were saying?”; “did
12 the Company staff understand the problems you were expressing”; or “was the Company
13 staff flexible in resolving your problem?”. Most importantly, these point-of-contact
14 surveys inquire into whether the customer felt that they had achieved a reasonable
15 resolution to the problem they presented.

16
17 **Q. WHAT TYPES OF QUESTIONS DO THE SURVEYS PROVIDED BY PEOPLES**
18 **CONTAIN?**

19 A. Most of the customer satisfaction questions in the surveys provided by Peoples addressed
20 the ease of making contact with the Company. One series of questions related to the ease
21 of negotiating the Company’s automated telephone system. One series of questions
22 related to the time and ease (or lack thereof) it took to reach a customer representative.
23 Other than those, however, the questions used in the surveys were highly abstract.

1 Expecting customer representatives to be “courteous” and “knowledgeable,” for example,
2 set a fairly low bar for the quality of service to be offered by a public utility.

3
4 **Q. ARE THERE OTHER WAYS IN WHICH THE COMPANY’S CUSTOMER**
5 **SERVICE FALLS SHORT?**

6 A. Yes. As explained above, Peoples has undertaken no effort to understand why customers
7 do *not* make personal contact with the Company in response to a written notice indicating
8 the customer should do so to avoid the disconnection of service. (OCA-III-36). The
9 Company has made no effort to understand why customers are unable to complete
10 payment agreements even once entered into. (OCA-III-38). These are two key elements
11 of customer service (payment agreements, disconnection prevention).

12
13 One shortcoming in customer service relates to the offer of winter shutoff protections.
14 The Commission’s regulations state that “Unless otherwise authorized by the
15 Commission, during the period of December 1 through March 31, an electric distribution
16 utility or natural gas distribution utility may not terminate service to customers with
17 household incomes at or below 250% of the Federal poverty level except as provided in
18 this section or in §56.98.” (52 PA Code §56.100).¹⁷ Despite this regulation, when asked
19 those circumstances in which the Company would obtain income information, Peoples
20 responded:

¹⁷ Section 56.98 governs situations involving (1) unauthorized use of the service delivered on or about the affected dwelling; (2) fraud or material misrepresentation of the customer’s identity for the purpose of obtaining service; (3) tampering with meters or other public utility equipment; and (4) violating tariff provisions on file with the Commission which endanger the safety of a person or the integrity of the public utility’s delivery system. Terminations pursuant to this section are set aside for purposes of this discussion.

1 Income, as well as household occupancy, information is gathered at several
2 points of customer contact to ensure the customer is fully aware of beneficial
3 services available to them. Circumstances that involve obtaining the
4 information includes:

- 5
- 6 ○ Starting a relationship with the customer, such as the initial request for
7 natural gas service.
- 8
- 9 ○ Subsequent and ongoing contacts with the customer, including customer
10 consultations to determine affordable payment amounts as well as
11 available Universal Service programs.
- 12
- 13 ○ Continuing a relationship with the customer, such as additional requests
14 for natural gas service (concurrent service or transferring service to a new
15 location).
- 16
- 17 ○ Discussion of past due arrears and/or receipt of a Termination Notice to
18 determine options for affordable payments, such as a Payment
19 Arrangement or a Universal Service such as the Customer Assistance
20 Program as well as several Energy Assistance grants programs.
- 21

22 (OCA-III-30). Absent from this list is any effort to determine whether customers are
23 income eligible for the cold weather protections. This failure to solicit income
24 information to determine eligibility for cold weather protection is of particular concern.

25 The Company states that it defines “low-income” to be “monthly gross income and
26 household size that matches the Federal Poverty Limit of 200% or less.” (OCA-III-30).
27 Eligibility for cold weather protections, of course, is set at 250% of Poverty. In providing
28 copies of “company procedures [which] include steps for obtaining income information
29 and discussing services with low-income customers,” no-one mentions the PUC’s cold
30 weather protection regulation. (OCA-III-32).

31

1 Neither does the Company’s tariff provide guidance. Rather than informing customers
2 that the Company will provide protections for households with income at or below 250%
3 of Poverty Level, along with informing customers of what is required to establish that
4 eligibility, the applicable tariff provision states simply “Unless otherwise authorized by
5 the Commission, after November 30 and before April 1, the Company will not terminate
6 service to customers with household incomes at or below the qualifying level as
7 determined by Commission regulation or PA Statute.” (Volume VI, Appendix D,
8 Original Page 21).

9
10 Even aside from the more general observations I make, Peoples should be required to
11 document that it has processes in place to identify households that meet the income-
12 eligibility established by PUC regulation for cold weather protections, and establish
13 further, that those processes do not unreasonably restrict the access of income-eligible
14 customers to those protections.

15
16 **Q. WHAT IS YOUR CONCLUSION?**

17 A. Based on my discussion above, my ultimate conclusion is that, while I offer no specific
18 proposal to address “customer satisfaction” in this proceeding, the testimony offered by
19 Mr. O’Brien asserting an excellence in customer service should not be relied upon for
20 any substantive decisionmaking. To the extent I offer specific proposals that would
21 improve customer service, those specific proposals (e.g., relating to identifying low-
22 income customers; expanding CAP enrollment; offering third party notices; ensuring
23 compliance with cold weather protections, etc.) are contained throughout my discussion

1 above. Specific recommendations to resolve specific shortcomings, in other words, are
2 contained throughout my testimony.

3

4 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5 **A. Yes it does.**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-2018-3006818
Peoples Natural Gas Company LLC :

VERIFICATION

I, Roger D. Colton, hereby state that the facts above set forth in my Direct Testimony OCA Statement No. 4 are true and correct and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: _____



Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA. 02478
roger@fsconline.com

DATED: April 29, 2019
*270928

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2018-3006818
 :
 Peoples Natural Gas Company, LLC :

**EXHIBITS ACCOMPANYING
Direct Testimony of
Roger D. Colton**

**On Behalf of:
Office of Consumer Advocate**

Schedule RDC-1

Average Income by Number of Rooms or Number of Bedrooms in Housing Unit (Pennsylvania) American Community Survey (5-year data) (2012 – 2016)		
Number of Rooms / Bedrooms	Average Income by Number of Rooms / Number of Bedrooms	
	Rooms	Bedrooms
0	N/A	\$41,716
1	\$40,399	\$38,885
2	\$47,498	\$51,694
3	\$40,382	\$69,626
4	\$46,608	\$116,764
5 /a/	\$54,110	\$136,317
6	\$62,018	
7	\$77,180	
8	\$95,524	
9 /b/	\$119,211	
Total	\$69,336	\$75,671
NOTES:		
/a/ For bedrooms, data is top-coded at 5 bedrooms.		
/b/ For rooms, data is top coded at 9 rooms.		

Schedule RDC-2

Distribution of Housing Units by Income and Housing Unit Size (Number of Bedrooms): Pennsylvania									
	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150 - \$250,000	\$250,000 or more
No bedroom	1.8%	1.1%	0.9%	0.6%	0.6%	0.3%	0.3%	0.1%	0.3%
1 bedroom	15.7%	11.8%	8.7%	8.0%	5.6%	4.8%	2.3%	1.2%	1.5%
2 bedrooms	32.9%	31.0%	29.8%	29.2%	28.3%	23.1%	15.5%	8.6%	9.9%
3 bedrooms	39.6%	46.5%	49.2%	49.4%	51.7%	55.4%	56.1%	44.7%	36.1%
4 bedrooms	8.5%	8.1%	9.6%	10.9%	12.3%	14.4%	23.3%	40.8%	45.3%
5 or more bedrooms	1.5%	1.5%	1.7%	1.9%	1.6%	1.9%	2.5%	4.5%	7.0%
Total bedrooms	1.8%	1.1%	0.9%	0.6%	0.6%	0.3%	0.3%	0.1%	0.3%
American Community Survey (5-year data) (2012 - 2016)									

Schedule RDC-3

		Existing Bad Debt Offset	Allocated Offset
Peoples gross write-offs (\$) /a/	\$8,722,734		
Peoples Equitable gross write-offs (\$) /a/	44,985,137		
Total write-offs	413,707,871		
Percent Peoples of total	0.63633	0.0327 /b/	0.020808
Percent Peoples Equitable of Total	0.36367	0.12 /b/	0.04364
New Proposed Offset			0.064448
/a/ SOURCE: BCS annual report on collections performance and universal service programs.			
/b/ Existing Peoples and Peoples Equitable tariffs.			

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3006818
	:	
Peoples Natural Gas Company, LLC	:	

Appendix A. Abbreviated Colton Vitae

ROGER D. COLTON

BUSINESS ADDRESS: Fisher Sheehan & Colton
Public Finance and General Economics
34 Warwick Road, Belmont, MA 02478
617-484-0597 (voice) *** 617-484-0594 (fax)
roger@fsconline.com (e-mail)
<http://www.fsconline.com> (www address)

EDUCATION:

J.D. (Order of the Coif), University of Florida (1981)

M.A. (Economics), McGregor School, Antioch University (1993)

B.A. Iowa State University (1975) (journalism, political science, speech)

PROFESSIONAL EXPERIENCE:

Fisher, Sheehan and Colton, Public Finance and General Economics: 1985 - present.

As a co-founder of this economics consulting partnership, Colton provides services in a variety of areas, including: regulatory economics, poverty law and economics, public benefits, fair housing, community development, energy efficiency, utility law and economics (energy, telecommunications, water/sewer), government budgeting, and planning and zoning.

Colton has testified in state and federal courts in the United States and Canada, as well as before regulatory and legislative bodies in more than three dozen states. He is particularly noted for creative program design and implementation within tight budget constraints.

Commentator: Belmont Citizen-Herald: 2014 – present

Author of biweekly “Community Conversations” column for Belmont Citizen-Herald, weekly newspaper (June 2014 to present).

Host of biweekly “Community Conversations” podcast, Belmont Citizen-Herald, BMC Podcast Network (October 2016 to present)

National Consumer Law Center (NCLC): 1986 - 1994

As a staff attorney with NCLC, Colton worked on low-income energy and utility issues. He pioneered cost-justifications for low-income affordable energy rates, as well as developing models to quantify the non-energy benefits (*e.g.*, reduced credit and collection costs, reduced working capital) of low-income energy efficiency. He designed and implemented low-income affordable rate and fuel

assistance programs across the country. Colton was charged with developing new practical and theoretical underpinnings for solutions to low-income energy problems.

Community Action Research Group (CARG): 1981 - 1985

As staff attorney for this non-profit research and consulting organization, Colton worked primarily on energy and utility issues. He provided legal representation to low-income persons on public utility issues; provided legal and technical assistance to consumer and labor organizations; and provided legal and technical assistance to a variety of state and local governments nationwide on natural gas, electric, and telecommunications issues. He routinely appeared as an expert witness before regulatory agencies and legislative committees regarding energy and telecommunications issues.

PROFESSIONAL AFFILIATIONS:

Member: Board of Directors, Massachusetts Rivers Alliance
Columnist: Belmont Citizen-Herald
Producer: Belmont Media Center: BMC Podcast Network
Host: Belmont Media Center: Belmont Journal
Member: Belmont Town Meeting
Vice-chair: Belmont Light General Manager Screening Committee
Chair: Belmont Goes Solar
Coordinator: BelmontBudget.org (Belmont's Community Budget Forum)
Coordinator: Belmont Affordable Shelter Fund (BASF)
Chair: Belmont Solar Initiative Oversight Committee
Member: City of Detroit Blue Ribbon Panel on Water Affordability
Chair: Belmont Energy Committee
Member: Massachusetts Municipal Energy Group (Mass Municipal Association)
Past Chair: Housing Work Group, Belmont (MA) Comprehensive Planning Process
Past Member: Board of Directors, Belmont Housing Trust, Inc.
Past Chair: Waverley Square Fire Station Re-use Study Committee (Belmont MA)
Past Member: Belmont (MA) Energy and Facilities Work Group
Past Member: Belmont (MA) Uplands Advisory Committee
Past Member: Advisory Board: Fair Housing Center of Greater Boston.
Past Chair: Fair Housing Committee, Town of Belmont (MA)
Past Member: Aggregation Advisory Committee, New York State Energy Research and Development Authority.
Past Member: Board of Directors, Vermont Energy Investment Corporation.
Past Member: Board of Directors, National Fuel Funds Network
Past Member: Board of Directors, Affordable Comfort, Inc. (ACI)
Past Member: National Advisory Committee, U.S. Department of Health and Human Services, Administration for Children and Families, Performance Goals for Low-Income Home Energy Assistance.
Past Member: Editorial Advisory Board, International Library, *Public Utility Law Anthology*.

Past Member: ASHRAE Guidelines Committee, GPC-8, *Energy Cost Allocation of Comfort HVAC Systems for Multiple Occupancy Buildings*

Past Member: National Advisory Committee, U.S. Department of Housing and Urban Development, Calculation of Utility Allowances for Public Housing.

Past Member: National Advisory Board: Energy Financing Alternatives for Subsidized Housing, New York State Energy Research and Development Authority.

PROFESSIONAL ASSOCIATIONS:

National Association of Housing and Redevelopment Officials (NAHRO)

National Society of Newspaper Columnists (NSNC)

Association for Enterprise Opportunity (AEO)

Iowa State Bar Association

Energy Bar Association

Association for Institutional Thought (AFIT)

Association for Evolutionary Economics (AEE)

Society for the Study of Social Problems (SSSO)

International Society for Policy Studies

Association for Social Economics

BOOKS

Colton, *et al.*, *Access to Utility Service*, National Consumer Law Center: Boston (4th edition 2008).

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COLTON EXPERIENCE AS EXPERT WITNESS

2005 – PRESENT

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
I/M/O UGI-Electric	Office of Consumer Advocate	R-2017-2640058	Customer service / low-income cost recovery	Pennsylvania	18
I/M/O Ameren Illinois	Office of Attorney General	Docket 18-1008 (18-1009) (cons.)	Prepayment meters	Illinois	18
I/M/O Columbia Gas	Office of Consumer Advocate	R-2018-2647577	Customer service / low-income program design	Pennsylvania	18
I/M/O PECO (electric)	Office of Consumer Advocate	R-2018-3000164	Customer service / low-income program design	Pennsylvania	18
I/M/O Philadelphia Water Department requested rates for 2019 - 2021	Philadelphia Public Advocate	None	Water rate:: low-income program cost recovery / public fire protection / storm water charge exemptions	Philadelphia	18
I/M/O Commonwealth Edison Prepayment Meters	Illinois Office of Attorney General	17-0837	Electric customer service	Illinois	18
I/M/O 2018/2020 Statewide Energy Efficiency Plan	The Way Home / New Hampshire Legal Assistance	DE 17-136	Non-energy impacts / Low-income energy efficiency	New Hampshire	17
I/M/O DTE (electric) / gas EWR (energy waste reduction) plan	Sierra Club / Natural Resources Defense Council	Case No. U-18262	Low-income energy efficiency	Michigan	17
I/M/O DTE (electric)	Sierra Club / Natural Resources Defense Council	Case No. U-18255	Low-income energy efficiency	Michigan	17
I/M/O Merger of AltaGas and WGL Holdings	Office of People's Counsel	Case No. 9449	Low-income / charitable contributions / community impacts	Maryland	17
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	R-2017-2587783	Low-income / rate design	Pennsylvania	17
I/M/O UGI-Peoples Natural Gas	Office of Consumer Advocate	R-2016-2580030	Low-income	Pennsylvania	17
I/M/O Peoples Natural Gas	Office of Attorney General	16-0376	Low-income	Illinois	17
I/M/O UGI-PNG	Office of Consumer Advocate	R-2016-2580030	Rate design/EE&CP/Low-Income	Pennsylvania	17
I/M/O Pacific Gas and Electric Company	TURN	15-09-001	Electric bill affordability	California	16
I/M/O FirstEnergy Companies (Met Ed, Penelec, PennPower, West Penn Power)	Office of Consumer Advocate	R-2016-2537349; R-2016-2537352; R-2016-2537355; R-2016-2537359 (consolidated)	Rate design / low-income program cost recovery	Pennsylvania	16
I/M/O PGW Demand Side Management	Office of Consumer Advocate	P-2014-2459362	Demand Side Management	Pennsylvania	16
I/M/O Columbia Gas of Pennsylvania	Office of Consumer Advocate	R-2016-2529660	Rate design / customer service / Low-income program cost recovery	Pennsylvania	16
I/M/O Philadelphia Water Department	Public Advocate, City of Philadelphia	N/A	Low-income program design	Philadelphia	16
I/M/O UGI Gas	Office of Consumer Advocate	M-2015-2518438	Rate design, energy efficiency, customer service	Pennsylvania	16
Keener v. Consumers Energy	Keener (plaintiff)	15-146908-NO	Collections	State District Ct--MI	16
I/M/O Energy Efficiency and Conservation Plan, Phase III, PECO Energy	Office of Consumer Advocate	M-2015-2515691	Multi-Family Energy Efficiency	Pennsylvania	16
I/M/O Energy Efficiency and Conservation Plan, Phase III, Duquesne Light Company	Office of Consumer Advocate	M-2015-2515375	Multi-Family Energy Efficiency	Pennsylvania	16
I/M/O Energy Efficiency and Conservation Plan, Phase III, FirstEnergy Companies (Metropolitan Edison, Penelec, Penn	Office of Consumer Advocate	M-2015-2514767; M-2015-2514768; M-2015-2514769; M-2015-2514772	Multi-Family Energy Efficiency	Pennsylvania	16

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
Power, West Penn Power)					
I/M/O Energy Efficiency and Conservation Plan, Phase III, PPL Electric Corporation	Office of Consumer Advocate	M-2015-251-2515642	Multi-Family Energy Efficiency	Pennsylvania	16
I/M/O BC Hydro	Public Interest Action Centre	N/A	Rate design / terms and conditions / energy efficiency	British Columbia	15 - 16
Augustin v. Philadelphia Gas Works	Augustin (Plaintiffs)	2:14—cv-04238	Constitutional notice issues	U.S. District Court (E.D. PA)	15
I/M/O PPL Utilities	Office of Consumer Advocate	R-2015-2469275	Rate design / customer service	Pennsylvania	15
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2015-2468056	Rate design / customer service	Pennsylvania	15
I/M/O PECO Energy Company	Office of Consumer Advocate	R-2015-2468981	Rate design / customer service	Pennsylvania	15
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	P-2014-2459362	Demand Side Management	Pennsylvania	15
I/M/O SBG Management v. Philadelphia Gas Works	SBG Management	C-2012-2308454	Customer service	Pennsylvania	15
I/M/O Manitoba Hydro	Resource Action Centre		Low-income affordability	Manitoba	15
I/M/O FirstEnergy Companies (Met Ed, WPP, Penelec, Penn Power)	Office of Consumer Advocate	R-2014-2428742 (8743, 8744, 8745)	Rate design / customer service / storm communications	Pennsylvania	14
I/M/O Xcel Energy Company	Energy CENTS Coalition	E002/GR-13-868	Rate design / energy conservation	Minnesota	14
I/M/O Peoples Gas Light and Coke Company / North Shore Gas	Office of Attorney General	14-0224 / 14--0225	Rate design / customer service	Illinois	14
I/M/O Columbia Gas of Pennsylvania	Office of Consumer Advocate	R-2014-2406274	Rate design / customer service	Pennsylvania	14
I/M/O Duquesne Light Company Rates	Office of Consumer Advocate	R-2013-2372129	Rate design / customer service / storm communications	Pennsylvania	13
I/M/O Duquesne Light Company Universal Service	Office of Consumer Advocate	M-2013-2350946	Low-income program design	Pennsylvania	13
I/M/O Peoples-TWP	Office of Consumer Advocate	P-2013-2355886	Low-income program design / rate design	Pennsylvania	13
I/M/O PECO CAP Shopping Plan	Office of Consumer Advocate	P-2013-2283641	Retail shopping	Pennsylvania	13
I/M/O PECO Universal Service Programs	Office of Consumer Advocate	M-201202290911	Low-income program design	Pennsylvania	13
I/M/O Privacy of Consumer Information	Legal Services Advocacy Project	CI-12-1344	Privacy of SSNs & consumer information	Minnesota	13
I/M/O Atlantic City Electric Company	Division of Rate Counsel	BPU-12121071	Customer service / Storm communications	New Jersey	13
I/M/O Jersey Central Power and Light Company	Division of Rate counsel	BPU-12111052	Customer service / Storm communications	New Jersey	13
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2012-2321748	Universal service	Pennsylvania	13
I/M/O Public Service Company of Colorado Low-Income Program/Design	Xcel Energy d/b/a PSCo	12A--EG	Low-income program design / cost recovery	Colorado	12
I/M/O Philadelphia Water Department.	Philadelphia Public Advocate	No. Docket No.	Customer service	Philadelphia	12
I/M/O PPL Electric Power Corporation	Office of Consumer Advocate	R-2012-2290597	Rate design / low-income programs	Pennsylvania	12
I/M/O Peoples Natural Gas Company	Office of Consumer Advocate	R-2012-2285985	Rate design / low-income programs	Pennsylvania	12
I/M/O Merger of Constellation/Exelon	Office of Peoples Counsel	CASE 9271	Customer Service	Maryland	11
I/M/O Duke Energy Carolinas	North Carolina Justice Center	E-7, SUB-989	Customer service/low-income rates	North Carolina	11
Re. Duke Energy/Progress Energy merger	NC Equal Justice Foundation	E-2, SUB 998	Low-income merger impacts	North Carolina	11
Re. Atlantic City Electric Company	Division of Rate Counsel	ER1186469	Customer Service	New Jersey	11
Re. Camelot Utilities	Office of Attorney General	11-0549	Rate shock	Illinois	11
Re. UGI—Central Penn Gas	Office of Consumer Advocate	R-2010-2214415	Low-income program design/cost recovery	Pennsylvania	11
Re. National Fuel Gas	Office of Consumer Advocate	M-2010-2192210	Low-income program cost recovery	Pennsylvania	11

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
Re. Philadelphia Gas Works	Office of Consumer Advocate	P-2010-2178610	Program design	Pennsylvania	11
Re. PPL	Office of Consumer Advocate	M-2010-2179796	Low-income program cost recovery	Pennsylvania	11
Re. Columbia Gas Company	Office of Consumer Advocate	R-2010-2215623	Rate design/Low-income program cost recovery	Pennsylvania	11
Crowder et al. v. Village of Kauffman	Crowder (plaintiffs)	3:09-CV-02181-M	Section 8 utility allowances	Texas Fed Court	11
I/M/O Peoples Natural Gas Company.	Office of Consumer Advocate	T-2010-220172	Low-income program design/cost recovery	Pennsylvania	11
I/M/O Commonwealth Edison	Office of Attorney General	10-0467	Rate design/revenue requirement	Illinois	10
I/M/O National Grid d/b/a Energy North	NH Legal Assistance	DG-10-017	Rate design/revenue requirement	New Hampshire	10
I/M/O Duquesne Light Company	Office of Consumer Advocate	R-2010-2179522	Low-income program cost recovery	Pennsylvania	10
I/M/O Avista Natural Gas Corporation	The Opportunity Council	UE-100467	Low-income assistance/rate design	Washington	10
I/M/O Manitoba Hydro	Resource Conservation Manitoba (RCM)	CASE NO. 17/10	Low-income program design	Manitoba	10
I/M/O TW Phillips	Office of Consumer Advocate	R-2010-2167797	Low-income program cost recovery	Pennsylvania	10
I/M/O PECO Energy—Gas Division	Office of Consumer Advocate	R-2010-2161592	Low-income program cost recovery	Pennsylvania	10
I/M/O PECO Energy—Electric Division	Office of Consumer Advocate	R-2010-2161575	Low-income program cost recovery	Pennsylvania	10
I/M/O PPL Energy	Office of Consumer Advocate	R-2010-2161694	Low-income program cost recovery	Pennsylvania	10
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2009-2149262	Low-income program design/cost recovery	Pennsylvania	10
I/M/O Atlantic City Electric Company	Office of Rate Council	R09080664	Customer service	New Jersey	10
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	R-2009-2139884	Low-income program cost recovery	Pennsylvania	10
I/M/O Philadelphia Gas Works	Office of Consumer Advocates	R-2009-2097639	Low-income program design	Pennsylvania	10
I/M/O Xcel Energy Company	Xcel Energy Company (PSCo)	085-146G	Low-income program design	Colorado	09
I/M/O Atmos Energy Company	Atmos Energy Company	09AL-507G	Low-income program funding	Colorado	09
I/M/O New Hampshire CORE Energy Efficiency Programs	New Hampshire Legal Assistance	D-09-170	Low-income efficiency funding	New Hampshire	09
I/M/O Public Service Company of New Mexico (electric)	Community Action of New Mexico	08-00273-UT	Rate Design	New Mexico	09
I/M/O UGI Pennsylvania Natural Gas Company (PNG)	Office of Consumer Advocate	R-2008-2079675	Low-income program	Pennsylvania	09
I/M/O UGI Central Penn Gas Company (CPG)	Office of Consumer Advocate	R-2008-2079660	Low-income program	Pennsylvania	09
I/M/O PECO Electric (provider of last resort)	Office of Consumer Advocate	R-2008-2028394	Low-income program	Pennsylvania	08
I/M/O Equitable Gas Company	Office of Consumer Advocate	R-2008-2029325	Low-income program	Pennsylvania	08
I/M/O Columbia Gas Company	Office of Ohio Consumers' Counsel	08-072-GA-AIR	Rate design	Ohio	08
I/M/O Dominion East Ohio Gas Company	Office of Ohio Consumers' Counsel	07-829-GA-AIR	Rate design	Ohio	08
I/M/O Vectren Energy Delivery Company	Office of Ohio Consumers' Counsel	07-1080-GA-AIR	Rate design	Ohio	08
I/M/O Public Service Company of North Carolina	NC Department of Justice	G-5, SUB 495	Rate design	North Carolina	08
I/M/O Piedmont Natural Gas Company	NC Department of Justice	G-9, SUB 550	Rate design	North Carolina	08
I/M/O National Grid	New Hampshire Legal Assistance	DG-08-009	Low-income rate assistance	New Hampshire	08
I/M/O Empower Maryland	Office of Peoples Counsel	PC-12	Low-income energy efficiency	Maryland	08
I/M/O Duke Energy Carolinas Save-a-Watt Program	NC Equal Justice Foundation	E-7, SUB 831	Low-income energy efficiency	North Carolina	08
I/M/O Zia Natural Gas Company	Community Action New Mexico	08-00036-UT	Low-income/low-use rate design	New Mexico	08
I/M/O Universal Service Fund Support for the Affordability of Local Rural Telecomm Service	Office of Consumer Advocate	I-0004010	Telecomm service affordability	Pennsylvania	08
I/M/O Philadelphia Water Department	Public Advocate	No Docket No.	Credit and Collections	Philadelphia	08
I/M/O Portland General Electric Company	Community Action--Oregon	UE-197	General rate case	Oregon	08

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
I/M/O Philadelphia Electric Company (electric)	Office of Consumer Advocate	M-00061945	Low-income program	Pennsylvania	08
I/M/O Philadelphia Electric Company (gas)	Office of Consumer Advocate	R-2008-2028394	Low-income program	Pennsylvania	08
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2008-2011621	Low-income program	Pennsylvania	08
I/M/O Public Service Company of New Mexico	Community Action New Mexico	08-00092-UT	Fuel adjustment clause	New Mexico	08
I/M/O Petition of Direct Energy for Low-income Aggregation	Office of Peoples Counsel	CASE 9117	Low-income electricity aggregation	Maryland	07
I/M/O Office of Consumer Advocate et al. v. Verizon and Verizon North	Office of Consumer Advocate	C-20077197	Lifeline telecommunications rates	Pennsylvania	07
I/M/O Pennsylvania Power Company	Office of Consumer Advocate	P-00072437	Low-income program	Pennsylvania	07
I/M/O National Fuel Gas Distribution Corporation	Office of Consumer Advocate	M-00072019	Low-income program	Pennsylvania	07
I/M/O Public Service of New Mexico--Electric	Community Action New Mexico	07-00077-UT	Low-income programs	New Mexico	07
I/M/O Citizens Gas/NIPSCO/Vectren for Universal Service Program	Citizens Gas & Coke Utility/Northern Indiana Public Service/Vectren Energy	CASE 43077	Low-income program design	Indiana	07
I/M/O PPL Electric	Office of Consumer Advocate	R-00072155	Low-income program	Pennsylvania	07
I/M/O Section 15 Challenge to NSPI Rates	Energy Affordability Coalition	P-886	Discrimination in utility regulation	Nova Scotia	07
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	R-00061931	Low-income programs / credit and collections	Pennsylvania	07
I/M/O Equitable Gas Company	Office of Consumer Advocate	M-00061959	Low-income program	Pennsylvania	07
I/M/O Public Service Company of New Mexico	Community Action of New Mexico	Case No. 06-000210-UT	Late charges / winter moratorium / decoupling	New Mexico	06
I/M/O Verizon Massachusetts	ABCD	Case NO. DTE 06-26	Late charges	Massachusetts	06
I/M/O Section 11 Proceeding, Energy Restructuring	Office of Peoples Counsel	PC9074	Low-income needs and responses	Maryland	06
I/M/O Citizens Gas/NIPSCO/Vectren for Univ. Svc. Program	Citizens Gas & Coke Utility/Northern Indiana Public Service/Vectren Energy	Case No. 43077	Low-income program design	Indiana	06
I/M/O Public Service Co. of North Carolina	North Carolina Attorney General/Dept. of Justice	G-5, Sub 481	Low-income energy usage	North Carolina	06
I/M/O Electric Assistance Program	New Hampshire Legal Assistance	DE 06-079	Electric low-income program design	New Hampshire	06
I/M/O Verizon Petition for Alternative Regulation	New Hampshire Legal Assistance	DM-06-072	Basic local telephone service	New Hampshire	06
I/M/O Pennsylvania Electric Co./Metropolitan Edison Co.	Office of Consumer Advocate	N/A	Universal service cost recovery	Pennsylvania	06
I/M/O Duquesne Light Company	Office of Consumer Advocates	R-00061346	Universal service cost recovery	Pennsylvania	06
I/M/O Natural Gas DSM Planning	Low-Income Energy Network	EB-2006-0021	Low-income gas DSM program.	Ontario	06
I/M/O Union Gas Co.	Action Centre for Tenants Ontario (ACTO)	EB-2005-0520	Low-income program design	Ontario	06
I/M/O Public Service of New Mexico merchant plant	Community Action New Mexico	05-00275-UT	Low-income energy usage	New Mexico	06
I/M/O Customer Assistance Program design and cost recovery	Office of Consumer Advocate	M-00051923	Low-income program design	Pennsylvania	06
I/M/O NIPSCO Proposal to Extend Winter Warmth Program	Northern Indiana Public Service Company	Case 42927	Low-income energy program evaluation	Indiana	05
I/M/O Piedmont Natural Gas	North Carolina Attorney General/Dept. of Justice	G-9, Sub 499	Low-income energy usage	North Carolina	05
I/M/O PSEG merger with Exelon Corp.	Division of Ratepayer Advocate	EM05020106	Low-income issues	New Jersey	05
Re. Philadelphia Water Department	Public Advocate	No docket number	Water collection factors	Philadelphia	05
I/M/O statewide natural gas universal service program	New Hampshire Legal Assistance	N/A	Universal service	New Hampshire	05

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
I/M/O Sub-metering requirements for residential rental properties	Tenants Advocacy Centre of Ontario	EB-2005-0252	Sub-metering consumer protections	Ontario	05
I/M/O National Fuel Gas Distribution Corp.	Office of Consumer Advocate	R-00049656	Universal service	Pennsylvania	05