



COMMUNITY LEGAL SERVICES  
OF PHILADELPHIA

March 17, 2011

**By Hand Delivery**

Honorable Christopher P. Pell  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

Re: Petition of Philadelphia Gas Works to Modify its Universal Service and Energy Conservation Plan with Respect to the Customer Responsibility Program,  
Docket No. P-2010-2178610

Dear Judge Pell:

Enclosed please find a corrected page 14 for the Direct Testimony and Exhibits of Robert J. Brand which was served on parties as TURN Statement No. 1 on March 15, 2011, in the above captioned matter.

The revised page contains the following corrections:

On line 2, the word "two" has been substituted for "three."  
On lines 8 and 9, the words "for pre-CRP arrears have been deleted."  
On line 17, the phrase "divided by Row 12" has been amended to read "divided by 12."

Copies of this corrected page 14 have been served on the parties as indicated on the Certificate of Service.

Very truly yours,

  
PHILIP A. BERTOCCHI  
THU B. TRAN

Attorneys for TURN et al.

Enclosures

cc: Rosemary Chiavetta, Secretary -- Letter and Certificate of Service Only

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served copies of the corrected page 14 of TURN St. No. 1 upon the persons listed below in accordance with the requirements of 52 Pa.Code § 1.54.

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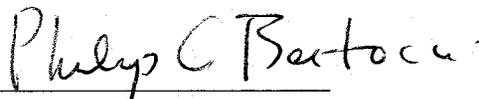
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Philip A. Bertocci, Esquire

1 range of CRP customers. Example household 10 is a household with the amount of  
2 income which a two person household living on DPW Cash Assistance would receive.

3  
4 **Q. Please explain what is depicted on each Row on Schedule 1.**

5 A. Specifically, Schedule 1 shows the following for each of the 10 households:

- 6 ■ Rows 1, 2, and 3 show each household's monthly income, annual income, and  
7 percentage of the Federal Poverty Guidelines respectively;
  - 8 ■ Row 4 shows the current CRP payment amount of each household (Row 1  
9 multiplied by Row 5);
  - 10 ■ Row 5 shows the current natural gas energy burden of each household  
11 determined as a percentage of total household income;
  - 12 ■ Row 6 shows the LIHEAP Cash grant each CRP household assigning a grant  
13 to PGW would have received based on household size and gross household  
14 income;
  - 15 ■ Row 7 shows the monthly LIHEAP Cash Adjustment that would have been  
16 added to each household's CRP payment amount under the Modified Model  
17 ([Row 6 divided by 12] multiplied by 0.58);
  - 18 ■ Row 8 shows the new CRP payment amount each household would have been  
19 required to pay under PGW's Modified Model (Row 7 plus Row 4);
  - 20 ■ Row 9 shows the percentage of increase in CRP payments for each household  
21 under the Modified Model ([Row 8 minus Row 4] divided by Row 4) ;
  - 22 ■ Row 10 shows the increased natural gas energy burden of each household  
23 under CRP's proposed modification (Row 1 divided by Row 8);
  - 24 ■ Row 11 shows the percentage of increase in energy burden for each household  
25 under the Modified Model (Row 10 minus Row 5).
- 26

27 **Q. What data were used to calculate the FPG of each example household in line 6 of**

28 **Schedule 1?**

29 A. I used the U.S. Department of Health and Human Services' Poverty Guidelines  
30 registered in the Federal Register, August 3, 2010. Exhibit RJB-2. These are the  
31 Guidelines which would have been applied if the Modified Model had been implemented  
32 last fall for the current LIHEAP Year.