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May 13, 2014

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 Submitted in Compliance with 52 Pa. Code § 62.4 - Docket No. M-2013-2366301

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Comments of TURN et al. in the above-captioned matter. Copies will be served in accordance with the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Josie B. H. Pickens'.

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Enclosures

TABLE OF CONTENTS

TABLE OF CONTENTS i

Comments of TURN et al. 1

I. INTRODUCTION 1

II. ISSUES IDENTIFIED IN THE COMMISSION’S TENTATIVE ORDER 3

A. DECLINE IN CRP ENROLLMENT..... 3

B. CRP ENROLLMENT PROCEDURES..... 5

 1. Requiring Social Security Cards..... 5

 2. Requiring Proof of Living Expenses for Minimal Income 6

 3. Requiring Customers to Apply/Recertify at a PGW District Office 8

C. CRP OPERATION..... 9

 1. Minimum CRP Payments 9

 2. Restrictions to Pre-program Arrearage Forgiveness 9

III. ADDITIONAL ISSUES 11

A. PGW’s PROPOSED MODIFICATIONS TO UNIVERSAL SERVICE PROGRAMS 11

 1. CRP Stay-Out Provision and Treatment of Unauthorized Usage Charges 11

 2. Enhanced Fraud Detection..... 14

IV. CONCLUSION.....15

I. INTRODUCTION

On April 3, 2014, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) issued a Tentative Order in the matter of Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 Submitted in Compliance with 52 Pa. Code § 62.4., Docket No. M-2013-2366301 (“Tentative Order”). The Tentative Order tentatively approved PGW’s Plan (“Plan”) and solicited comments from interested parties. These Comments are submitted on behalf of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively “TURN et al.”).

The purpose of these Comments is to address the issues that the Commission has identified in its April 3, 2014 Tentative Order for comments from PGW and interested parties, as well as related issues raised by PGW’s Plan but not specifically identified by the Commission.

The Commission has listed the issues as follows:

1. Based on the concerns noted relative to LIURP reporting, PGW should clarify how it aligns LIURP and other universal service program reporting with its business year which runs September 1 through August 31.
2. Additional details regarding the application of customer CRP \$5 co-payments to pre-program arrears.
3. Minimum amount a CRP customer must pay for gas service.
4. Policy change consideration regarding requiring Social Security Cards for enrollment in CRP.
5. Arrearage forgiveness with each on time and in-full monthly CRP payment and retroactive forgiveness for any months missed, once each month is caught up or paid in full.
6. Acceptance of statement of customer’s ability to meet living expenses when reporting zero or minimal income.
7. Ongoing monitoring of CRP accounts to ensure billing the customer on the most affordable rate.
8. Alternatives to applying/recertifying for CRP at PGW district offices.
9. Waivers from LIURP regulations at Pa. Code 52 § 58.11(a) and § 58.5.
10. Description of administrative costs associated with the hardship fund program.

11. Decline in CRP enrollment over the past three years and no increases anticipated through 2016.

Tentative Order at 33-34. In addition, the Commission noted, but did not specifically identify for comments, PGW's proposal to modify its Universal Service programs in the following ways:

1. Restrict re-enrollment of a customer into its Customer Responsibility Program for a one-year period if the customer commits two or more incidents of unauthorized usage and require CRP customers to pay all unauthorized use charges to have service restored or to re-enroll in CRP.
2. Enhancements to employee training, fraud detection, quality control and intake processes.

Tentative Order at 8-9. The Commission further directed PGW to file ELIRP enrollment and budget estimates for the 2015 and 2016 program years, within 20 days of the entry date of the Tentative Order.

The Tentative Order was served on the parties to *PGW USECP 2008-2010*, Docket No. M-00072021, and *PGW USECP 2011-2013*, Docket No. P-2010-2178610 to afford them notice and the opportunity to be heard relative to the changes specified. TURN et al. were parties in these prior proceedings and have a direct and substantial interest in the outcome of the instant Plan.

PGW filed its response to the Commission's proposals regarding ELIRP scheduling on April 23, 2014.

The primary focus of TURN et al.'s Comments addresses the decline in CRP enrollment over the past three years, at a time when it could be reasonably expected that enrollment should be trending upward. As the Commission notes, there appear to be substantial barriers impairing the ability of low income PGW customers to enroll in CRP and once enrolled, to maintain their participation in the program. Accordingly, TURN et al. submit these Comments urging the Commission to Order PGW to do the following:

1. Examine its service termination and reconnection policies and practices to assess their impact on CRP enrollment;
2. Adopt CRP application policies that provide for alternate documentation in lieu of Social Security Numbers and for the right to assert the right to privacy against SSN disclosure;
3. Cease the current practice of requiring applicants reporting zero or minimum income to document living expenses and provide such customers with a less burdensome alternative method to document income;
4. Offer alternate means of CRP application and recertification documentation submission, such as through the acceptance of facsimile transmittals and online applications and accept alternate forms of income verification for CRP recertification;
5. Grant arrearage forgiveness with every current on time and in full CRP payment *and* retroactive arrearage forgiveness once the customer has cured all defaulted CRP bills;
6. Eliminate its unnecessarily punitive or unfairly stigmatizing CRP stay-out proposals; and
7. Identify the cost and benefits of any enhanced fraud detection measures and disclose the results of any research PGW has conducted to demonstrate that such measures are necessary.

In the alternative, TURN et al. request that the Commission refer these issues to the OALJ for hearing and decision.¹

II. ISSUES IDENTIFIED IN THE COMMISSION'S TENTATIVE ORDER

A. DECLINE IN CRP ENROLLMENT

The Commission noted that PGW's CRP participation declined 17% from December 2010 to December 2013, from a level of 82,544 participants to 68,458 participants, respectively. Tentative Order at 30, Table 5. The Commission further noted that PGW is planning to increase outreach efforts to increase CRP enrollment, but at the same time does not anticipate any increase in CRP enrollment and cost over the 2014-16 three-year plan period.² The Commission has directed PGW to share, in its comments, the results of its investigation into the decline of CRP enrollment and discuss any resulting proposed changes. TURN et al. share the Commission's concern over the 17% decline in PGW's CRP participation over the past 3 years,

¹ TURN et al. are not in possession of sufficient information at this time to address several of the issues raised in the Tentative Order. TURN et al. reserve the right to comment on PGW's allocation of the monthly \$5 CRP charge for pre-program arrears; CRP account monitoring; LIURP reporting requirements; waiver from LIURP regulations; administrative costs of the hardship fund, and other matters raised by the parties in their initial comments.

² PGW anticipates annual participation in CRP for the three years of the proposed Plan to be a constant 76,042 customers. PGW USECP at 13. PGW provides no explanation regarding how this level of participation relates to the downward trend noted by the Commission, which resulted in about 7,500 fewer participants in December 2013.

look forward to examining the results of this investigation and anticipate submitting reply comments on this topic.

TURN et al. submit that PGW's service termination and reconnection practices should receive specific Commission attention, given PGW's relatively high service termination rates and low reconnection rates generally, and with regard to low income customers in particular. For instance, in the 2013 PUC Cold Weather Survey (Dec. 2013), there were 9,049 PGW households without a central heating source due to termination of gas utility service in the prior January-November 2013 time period. This PGW figure is almost 2/3 or 63% of the state-wide total of 14,466 households without central heat due to gas utility shut offs. Statewide, gas utilities reconnected service by February 1, 2014 to over a third or 38% of those households who were without their gas heat as of December 1, 2013. However, PGW only restored heat service to 22% of Philadelphia households who were without heat as of December 1. Of the 7,103 customers still without heat service on February 1, 2014, well over a third, 2,883 (or 41%), were accounts identified as low income or CAP customers.

PGW's reconnection percentage, during this latest winter and prior winters, is the lowest of all PUC-regulated Pennsylvania utilities. Winter after winter, PGW leads the state with the highest service termination rates and, at the same time, lags behind with the lowest reconnection rates. Low-income and CAP customers suffer the harshest consequences in high proportions, enduring many months without heat service and possibly being forced to stay off PGW's system and CRP for extended periods beyond the time period of the Cold Weather Survey. Therefore, TURN et al. recommend that this issue be referred to the OALJ for further investigation as part of the investigation of the reasons for the low levels of PGW CRP enrollment.

B. CRP ENROLLMENT PROCEDURES

i. Requiring Social Security Cards

The Commission has raised the issue of whether PGW should consider a policy change regarding its practice of requiring customers to present Social Security cards for all household members as a precondition for enrollment in CRP. The Commission has questioned whether this requirement is redundant and burdensome on applicants who have already provided identification with an application for service and whether the requirement creates delays in the CRP intake process. Tentative Order 13. The Commission has noted that a Social Security Number (SSN) is not required under the CAP Policy Statement and has proposed that PGW “review its CRP application procedures and consider alternatives to requiring customers to provide a Social Security Number for each household member as a precondition for CRP enrollment.” Tentative Order at 13-14.

PGW’s proposed Plan requires CRP applicants to not only provide an SSN but “a copy of the social security card for each household member listed on the application.” PGW USECP at 10. PGW has set forth no rationale for its more demanding, burdensome policy of requiring not only an SSN but copies of Social Security cards for each household member. APPRISE data indicates that an SSN requirement is a barrier to CRP enrollment for some customers.³

TURN et al. oppose PGW’s practice of requiring SSNs and Social Security cards from CRP applicants and each household member listed on the CRP application. These requirements should be rejected by the Commission because they are burdensome for applicants who do not possess or cannot obtain an SSN or a copy of a Social Security card for the customer or a

³ In its analysis of the difficulty of CAP recertification, APPRISE found that 7% of CRP applicants found it somewhat or very difficult to recertify for CRP. PGW Universal Service Impact Evaluation Final Report November 2012 at 32-33. When asked to report on what they found difficult, respondents were most likely to cite providing proof of income and social security numbers. PGW Universal Service Impact Evaluation Final Report November 2012 (APPRISE Evaluation) at 33.

household member. In PECO's 2013-2015 USECP proceeding, TURN et al. and other parties argued that the policy of requiring SSNs of CAP applicants raises serious privacy and other policy concerns. PECO USECP 2013-2015, Docket No. M-2012-2290911, TURN et al. Reply Comments at 6; OCA Comments at 13-14. TURN et al. specifically argued that an SSN requirement is particularly burdensome in the Philadelphia area due to a high concentration of immigrant households. PECO USECP 2013-2015, Docket No. M-2012-2290911, TURN et al. Comments at 8-9. TURN et al. argued that an SSN requirement would condition CAP enrollment upon having a particular immigration status and that there are immigration visas that do not require the immigrant to apply for an SSN.⁴ PECO now accepts Individual Tax Identification Numbers (ITINs) and allows CAP applicants to refuse to provide their SSNs without losing eligibility. Tentative Order at 14.

PGW should adopt CRP application policies that provide for alternate documentation in lieu of SSNs and for the right to assert the right to privacy against SSN disclosure. PGW has not articulated its rationale for its requirement regarding provision of Social Security cards and SSNs as a precondition of CRP enrollment, or whether any necessary identification verification can be served by the acceptance of alternate documentation; however, if PGW believes alternate documentation is insufficient, it should be required to provide evidentiary support for this position in a proceeding referred to the OALJ for hearing and decision.

ii. Requiring Proof of Living Expenses for Minimal Income

The Commission has solicited comments on PGW's practice of requiring proof of living expenses where a CRP applicant reports zero or minimal household income. Tentative Order at

⁴ In the PECO proceeding, TURN et al. further argued that conditioning enrollment on ITINs is also problematic because ITINs are not available to every immigrant who is unable to obtain a SSN and there is significant processing time required for obtaining an ITIN for those who are eligible. PECO USECP 2013-2015, Docket No. M-2012-2290911, Reply Comments at 6-7. For these reasons, if PGW decides to modify its policy, ITINs should not be the only acceptable alternate documentation.

15. The Commission expressed concern that PGW's policy could delay processing of CRP applications and create serious financial consequences for PGW's lowest income customers. Tentative Order at 16. The Commission has further stated that other Pennsylvania electric and gas companies allow these customers to document income through a "zero income form" or a written statement of how the customer is meeting his/her expenses. Tentative Order at 16.

PGW's Plan is silent as to what zero or minimal income customers are required to do to verify their income. Tentative Order at 15. The APPRISE Evaluation provides a list of the types of income verification that are currently accepted by PGW. APPRISE Evaluation at 10. A zero or minimum income customer is only able to document everyday living expenses by providing proof of paid bills. PGW has not articulated a rationale for its requirement and the APPRISE Evaluation indicates that documentation of income is a barrier to CRP enrollment for some customers. APPRISE Evaluation at 33.

TURN et al. urge the Commission to order PGW to cease its current practice of requiring applicants reporting zero or minimal income to document living expenses and to provide such customers with a less burdensome alternative method to document income. Documentation of monthly expenses is burdensome and likely to be fragmentary and subject to arbitrary interpretation, and delays processing of the CRP application.⁵ A statement explaining how the customer pays for his/her expenses is more appropriate and would allow PGW to better verify that the applicant is among the poorest of the poor, with no income from part-time work, self-employment, or public assistance. Alternatively, PGW could adopt a simple, one page "no income" form similar to the form PECO and other utilities have created, as noted by the Commission. Tentative Order at 16. For these reasons, the Commission should order PGW to

⁵ Customers with numerous expenses are likely to be most burdened because they might be required to track down varying types of proof that may not be easily accessible, such as rent payments when the customer pays in cash and does not have a lease or easy access to the landlord.

cease its practice of requiring documentation of expenses from CRP applicants reporting zero or minimal income. In the alternative, PGW should be required to present an evidentiary basis for why documentation of expenses is necessary to the operation of PGW's CRP, and such evidence should be subject to scrutiny in a proceeding before an ALJ.

iii. Requiring Customers to Apply/Recertify at a PGW District Office

The Commission has found 39 instances, among 450 informal complaints filed at the Commission by PGW customers, where customers were informed they must come to a PGW district office to provide required information for their CRP applications or recertifications. Tentative Order at 18. The Commission expressed concern that "[t]raveling to a district office is a hardship for some PGW customers, particularly the home-bound, those who are ill, working adults, or individuals with limited access to transportation." *Id.* While there is a PGW policy to accept applications and recertifications by mail, at least one person was informed that mailing in the CRP application documentation would delay the application process by 4 to 6 weeks. PGW has been directed by the Commission to address in its comments what alternatives it offers to accommodate customers who need to apply or recertify for CRP, and further, what steps it takes to ensure that all CRP applications and recertifications, regardless of how they are submitted, are processed timely. Tentative Order at 19.

TURN et al. recommend that PGW be directed to offer alternate means of CRP application and recertification documentation submission, such as through the acceptance of facsimile transmittals and online applications.⁶ TURN et al. further recommend that alternate forms of income verification be accepted for CRP recertification. For instance, the current practice of PECO Energy, which also serves the entire PGW service territory, is to recertify a

⁶ For example, see the PECO Energy website where the mail, fax and online application options are provided, <https://www.peco.com/CustomerService/AssistancePrograms/CAP/Pages/CAPApplication.aspx>, accessed May 13, 2014.

customer into the low-income discounted CAP Rate program upon PECO's being assigned a LIHEAP grant. Since LIHEAP has the same maximum income eligibility of 150% FPL as CRP and CAP Rate, accepting the proxy LIHEAP income verification eliminates the inefficiency of requiring further income documentation for recertification. PGW should be ordered to adopt a similar policy for CRP recertification.

C. CRP OPERATION

i. Minimum CRP Payments

TURN et al. note that the current PGW Gas Service Tariff at 13.1.C.2 provides that a CRP participant will be responsible for paying the greater of \$25 per month or 8%, 9% or 10% of gross income.

ii. Restrictions to Pre-program Arrearage Forgiveness

In its Tentative Order, the Commission invited comments on "whether PGW should apply 1/36th arrearage forgiveness with each on time and in full current CRP payment, whether or not all prior months CRP payments were paid in full, or whether arrearage forgiveness should only be granted when CRP payments, both current and past payments, are paid in full."

Tentative Order at 15. The Commission invited PGW to comment on whether arrearage forgiveness would be applied retroactively once the customer has caught up on defaulted CRP bills, as PGW's Plan does not specify whether a customer receives retroactive forgiveness.

Tentative Order at 14-15. The Commission stated that the CAP Policy Statement does not require participants to catch up on missed payments to qualify for arrearage forgiveness and that arrearage forgiveness acts to reduce customer debt and reward healthy payment habits. Tentative Order at 15.

PGW currently places a CRP customer who falls 30 days behind on his/her bill into default status and does not allow the customer to receive arrearage forgiveness for subsequent monthly payments until all past due CRP bills are paid in full. PGW USECP at 10. PGW has not indicated how denying arrearage forgiveness to CRP customers who are in default status when current monthly payments are being made, encourages more consistent payment habits.

TURN et al. strongly support a policy of arrearage forgiveness with every current on time and in full CRP payment *and* retroactive arrearage forgiveness once the customer has cured all defaulted CRP bills; by the same token, TURN et al. strongly oppose PGW's current practice of only allowing single instances of 1/36th arrearage forgiveness each time all past and current CRP bills are paid in full. For many CRP customers, PGW's policy indefinitely delays the full benefits of reduced debt and fails sufficiently to reward for reasonably consistent payment habits.

In PECO's 2013-2015 USECP proceeding, the Commission directed PECO to apply "pre-program arrearage forgiveness for payments received throughout the year on a month to month basis and grant forgiveness when missed payments are caught up." PECO USECP 2013-2015, Docket No. M-2012-2290911, Final Order (April 4, 2013) at 28-29. The Commission agreed with the recommendation proposed by the Office of Consumer Advocate's ("OCA") witness Roger Colton, who recommended "CAP forgiveness on a month-to-month basis as complete bill payments are received OR at the end of 12 months, grant forgiveness for the year if customer paid the yearly amount billed in full (caught up), regardless if monthly payments were on time." PECO USECP 2013-2015, Docket No. M-2012-2290911, Final Order (April 4, 2013) at 28-29. ⁷

⁷ PGW CRP customers must wait at least 3 times as long – at least 36 months – in order to obtain full arrearage forgiveness. CRP customers should be provided greater incentive to catch up on bills through implementing the Commission's proposal to allow retroactive application of arrearage forgiveness once the customer has succeeded in becoming current on CRP bills. TURN et al. support the accelerated arrearage forgiveness currently being

In its study of past and current CRP participants, APPRISE found that nearly twenty percent of those surveyed did not know what they had to do to receive arrearage forgiveness. APPRISE Evaluation at 39. This data suggests that CRP customers could benefit from increased education on the arrearage forgiveness program and its benefits. PGW's current policy penalizes the many customers who do not realize or fully comprehend that falling behind on a CRP payment could have significant consequences on the customer's ability to reduce his/her pre-program arrearage.

The Commission has directed PGW to provide the estimated cost of implementing its current arrearage forgiveness crediting and the cost of the approach favored by PULP et al. and ordered by the Commission in the PECO 2013-2015 USECP proceeding. To the extent that PGW relies on cost or any other factor as a basis for the retention of its current arrearage forgiveness crediting, it should be required to provide evidentiary support for this position in a proceeding referred to the OALJ for hearing and decision.

III. ADDITIONAL ISSUES

A. PGW's PROPOSED MODIFICATIONS TO UNIVERSAL SERVICE PROGRAMS

i. CRP Stay-Out Provision and Treatment of Unauthorized Usage Charges

The Commission has tentatively approved PGW's USECP and has solicited comments on the eleven issues identified in its Tentative Order. The Commission has noted but has not specifically evaluated a number of proposed modifications to PGW's Universal Service programs that raise serious concerns for TURN et al. Tentative Order at 8-9. In its USECP,

considered by PGW, which would enable customers to have all arrearages forgiven in in two years instead of three years; however, the forgiveness period would continue to substantially exceed that afforded by PECO and PGW should continue to incentivize reasonably consistent payment habits by granting arrearage forgiveness with every CRP payment under either the current or an accelerated plan. APPRISE Evaluation at 15.

PGW proposes to disallow re-enrollment of a customer into its CRP for a one-year period if the customer commits two or more incidents of unauthorized usage. PGW USECP at 3-4. PGW also proposes to include specifically in its USECP the existing Company policy included in its Tariff regarding payment terms for restoration of service applicable to customers who have engaged in unauthorized use, i.e., the requirement that the customer pay the entire unauthorized usage amount as a condition of service restoration. PGW USECP at 4.

PGW has not provided any data on why it needs to implement special policies applicable to CRP customers who have engaged in unauthorized use. The only available data shows that PGW discovered unauthorized use on 34 of its 75,244 CRP accounts in 2012. PGW USECP at 12. Moreover, PGW has not provided any data on the number of CRP accounts where more than two incidents of unauthorized use were discovered and to what extent its current proposal barring re-enrollment into CRP would be applied to an actual customer. With regard to the proposal that PGW should not be allowed to reinstate CRP customers for unauthorized use without requiring upfront payment of the charges for the gas so consumed, PGW has not provided any specific information on the 34 CRP accounts identified in 2012 including, how many, if any, of these customers were permitted service restoration and reinstatement in CRP with the unbilled unauthorized use amount transferred to the customer's frozen arrears.⁸

TURN et al. view these proposals as unnecessary. With regard to the CRP customer who has engaged in unauthorized use two times, the proposal to bar the customer from CRP for a year is unnecessarily punitive. A customer who has twice engaged in unauthorized use has suffered a

⁸ TURN et al. have direct knowledge of cases in which PGW has included alleged unauthorized use charges in pre-program arrearages as a condition of settlement for CRP customers who have filed formal complaints contesting the charges. If the 34 incidents identified by PGW were the result of settlement agreements or a determination that the customer was not responsible for the unauthorized usage or some other finding that the standard policy on unauthorized use should not apply, then it would have been reasonable for PGW to apply a less harsh penalty than upfront payment of all unbilled unauthorized use amounts and there would be no basis for revision of the unauthorized use policy in the manner PGW proposes.

penalty each time – a period without utility service, lasting weeks and even months, while the low income customer assembles the amount of money to be paid upfront to obtain service restoration. In denying CRP re-enrollment to a customer who meets low-income eligibility criteria, PGW is likely to set up the customer for payment troubles. If that customer is enrolled as a non-CRP customer, he or she will still be low income, will still have trouble paying, and is likely to involve PGW in more collection activities than if he or she is on CRP.

With regard to whether PGW should require CRP customers to make up front payment of charges arising from unauthorized use, PGW's Tariff already permits it to fully recover from the responsible party all costs associated with unauthorized use as a pre-condition of service.⁹ The Tariff provides PGW with adequate measures to deter unauthorized use and obtain redress from the responsible party. PGW's Tariff does not currently enable a customer who is responsible for unauthorized use to avoid responsibility by enrolling in CRP.

TURN et al. take this opportunity to voice their strong protest against these two proposals, which unfairly and specifically associate the CRP population with unauthorized use, without the submission of any evidence showing that CRP customers are more likely than other customers to engage in unauthorized use.

The Commission should deny without further consideration PGW's unnecessarily punitive or unfairly stigmatizing proposals to modify its requirements for eligibility for CRP and operation of the program as it pertains to incidents of alleged unauthorized use. In the alternative,

⁹ Pursuant to its Tariff, PGW may require a responsible customer to pay for damage, destruction or loss of PGW's property that occurs on the customer's premises. PGW Tariff Section 8.1. In cases of meter tampering, PGW can remove its property from the customer's premises and withhold the property until the responsible customer pays the full amount of any estimated gas used. PGW Tariff Section 8.3.B. PGW can also refuse to provide gas service to an applicant who is responsible for unauthorized use until all unauthorized use charges are paid. 8.3. C. In addition, PGW is permitted to relocate its meter when it discovers that the meter has been tampered with, interfered with, or bypassed two or more times within a twelve month period. PGW Tariff Section 9.5.

PGW should be required to present an evidentiary basis for why the proposed modifications are necessary for the operation of its CRP in a proceeding before an ALJ.

ii. Enhanced Fraud Detection

PGW has proposed to “supplement and enhance existing controls to identify fraud, and will take samples of CRP applications to review more intensively for potential fraud (e.g. receiving income that has not been reported on the CRP application)...and will review current documentation it requires from CRP applicants to ensure that it is utilizing the most appropriate documents and practices [...]” PGW USECP at 13. PGW has not set forth the cost or anticipated benefits of these enhanced controls. In addition, these efforts run counter to the Commission’s search for ways to make CRP enrollment less burdensome for PGW low income customers.

In its evaluation, APPRISE recommended that PGW “select a small sample of cases and conduct a thorough investigation of income and household composition [so that PGW staff can] either feel more confident that current documentation requirements are sufficient and fraud is not as extensive as expected, and/or would provide information and ideas on whether and how more detailed review of eligibility could be conducted.” APPRISE Evaluation at 80. PGW has not presented the results of this sample or even confirmed that a study has been conducted. If the study has been conducted, PGW should include its proposals as part of its amended USECP. Both the study and PGW’s proposal should be made the subject of hearings before an ALJ. If the study has not been conducted, PGW should be required to demonstrate the need for such a study and justify including the costs of such a study as an administrative cost recoverable through its Universal Service Surcharge.

IV. CONCLUSION

In conclusion, TURN et al. urge the Commission to require PGW to take steps to eliminate substantial barriers impairing the ability of low income PGW customers to enroll in CRP and once enrolled, to maintain their participation in the program. CRP data already shows a dramatic decrease in CRP enrollment in recent years, indicating a distinct possibility that many low income households are enduring unaffordable bills due to inability to enroll in PGW's low-income programs, or, worse, doing without gas utility service altogether and resorting to unsafe alternatives. Accordingly, TURN et al. urge the Commission to order PGW to do the following:

1. Examine its service termination and reconnection policies and practices to assess their impact on declining CRP enrollment;
2. Adopt CRP application policies that provide for the provision of alternate documentation in lieu of Social Security Numbers and for the right to assert the right to privacy against SSN disclosure;
3. Cease the current practice of requiring applicants reporting zero or minimum income to document living expenses and provide such customers with a less burdensome alternative method to document income;
4. Offer alternate means of CRP application and recertification documentation submission, such as through the acceptance of facsimile transmittals and online applications and accept alternate forms of income verification for CRP recertification;
5. Grant arrearage forgiveness with every current on time and in full CRP payment *and* retroactive arrearage forgiveness once the customer has cured all defaulted CRP bills;
6. Eliminate its unnecessarily punitive or unfairly stigmatizing CRP stay-out proposals; and
7. Identify the cost and benefits of any enhanced fraud detection measures and disclose the results of any research PGW has conducted to demonstrate that such measures are necessary.

Respectfully submitted,

/s/ Josie B. H. Pickens

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Date: May 13, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day, served a copy of the foregoing Comments of TURN et al. upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant).

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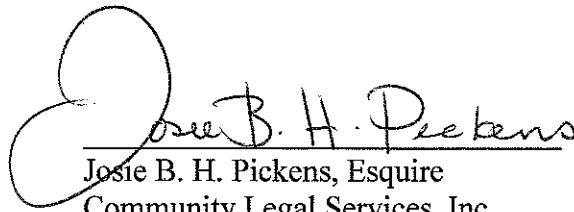
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