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June 8, 2020

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: COVID 19 Customer Service, Billing and Public Outreach Provisions Request for Utility Information – Docket No. M-2020-3020055

Dear Secretary Chiavetta:

Enclosed for electronic filing is Philadelphia Gas Works' ("PGW") Responses to the Secretarial Letter dated May 29, 2020 in the above-referenced matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Daniel Clearfield

DC/lww  
Enclosure

cc: [sdewey@pa.gov](mailto:sdewey@pa.gov)  
[thcharles@pa.gov](mailto:thcharles@pa.gov)  
Graciela Christlieb, Esq.

June 8, 2020

**Docket No. M-2020-3020055**

**COVID-19 Utility Consumer Service and Billing Policies and Procedures**

Below is PGW's report on its efforts to support customers in response to the COVID-19 pandemic.

**A. Termination of Utility Service**

1. **QUESTION:** After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment? How does the utility plan to implement terminations and will it start the process with new termination notices?

**RESPONSE:** PGW intends to restart nonpayment terminations immediately after the Emergency Order ends. PGW will implement its termination of service plan consistent with the provisions of Chapter 56, such as the provision of 10-day termination notices in advance of the restart of terminations. With respect to such restart, termination notices are generally valid for 60 days under current law. Any nonpayment termination notices issued prior to the COVID-19 termination moratorium would have expired unless the PUC's Order tolled the expiration. Regardless of any tolling, new nonpayment termination notices will be issued by PGW for any planned terminations.

2. **QUESTION:** Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?
  - o Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
  - o Provide future projections if available.

**RESPONSE:** PGW submits there is a need for cautious strategic planning. As explained further herein, PGW has implemented a number of changes designed to assist customers who are currently struggling financially. Furthermore, PGW already has generous and effective universal service programs available to its customers most in need, including the newly unemployed. In addition, in the near future PGW will have a CAP pilot program that provides even more generous bill subsidization for Philadelphia's low income gas customers. In light of this, for PGW's future health and stability PGW will need to have a broad range of collection tools

available to it, including the ability to terminate service for customers who can afford to pay but don't, or who elect not to take advantage of PGW's robust universal service programs.

Currently, PGW does not have finalized account reports through May of 2020. Below is data through April 2020 - which may not be an exacting tool for determining the impacts of the pandemic or an extended stay on terminations. As of April 30, 2020 versus 2019, the number of customers who have debt that is past due is:

	<b>30-Apr-19</b>	<b>30-Apr-20</b>
<b>Commercial and Industrial</b>	<b>4,467</b>	<b>6,610</b>
<b>Tenant Landlord</b>	<b>47</b>	<b>96</b>
<b>Residential (no indication of low income status)</b>	<b>37,698</b>	<b>48,617</b>
<b>Residential (low income, including CAP)</b>	<b>35,861</b>	<b>36,122</b>

Note that in a normal collection season, when termination notices are issued customers often are incented to pay their bill or engage in other activity (e.g. enter a payment agreement, file a PUC complaint, obtain a Crisis grant) in response. Such incentive has not occurred this year. PGW does not have future projections at this point in time.

3. **QUESTION:** Is the utility currently assessing a "reconnection fee" to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission's Emergency Order that wish to pay any arrearage and stay connected?

**RESPONSE:** PGW is currently assessing its reconnection fee to restore service. This fee is due prior to reconnection. PGW is not allowing customers to pay "any arrearage" for reconnection – reconnection terms have not changed.

## B. Universal Service Programs

1. **QUESTION:** Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**RESPONSE:** No. PGW does not normally remove customers from CAP until termination of service. Thus, PGW does not remove customers from CAP for non-payment. In addition, currently PGW is not removing customers from CAP for failure to recertify.

2. **QUESTION:** What are the utility's current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history "good faith payment", or CAP participation criteria) and have these requirements been revised due to the pandemic?

**RESPONSE:** PGW has not revised Hardship Fund payment requirements, but has allowed enrollment without the need for a termination notice. PGW provides Hardship Funds by matching grants paid by the Utility Emergency Services Fund (UESF) to customers whose service is terminated or in danger of being terminated (currently not required). PGW funds are provided in the form of a matching bill credit of up to approximately \$750. Eligibility is limited to customers with a gross household income at or below 175% of the Federal Poverty Level (FPL). CAP participation is not required. The combination of the UESF grant and the PGW matching credit cannot normally exceed \$1,500 (for City grants) and must eliminate the total amount due (not including pre-CAP participation arrears) and, if the customer seeks restoration, any written off debt required for restoration. If the total amount due exceeds \$1,500, the customer must pay the difference, either out of pocket or through other utility assistance grants such as LIHEAP.

## C. Other Assistance Initiatives

1. **QUESTION:** Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

**RESPONSE:** PGW has taken a number of actions to assist its customers that go beyond PUC requirements. For example, currently PGW:

1. is not charging late payment fees;
2. is not removing customers for failing to complete the CAP re-certification process;

3. is not requiring acceptance of LIURP (low income usage reduction program) weatherization as a condition of CAP participation or otherwise;
  4. has not been engaging in (non-essential) field visits for high bill disputes;
  5. has surveyed customers to determine how to provide assistance and communications during the pandemic;
  6. adjusted its requirements for CAP documentation for customers unable to obtain unemployment documentation due to the pandemic;
  7. allows the submission of emailed documentation for new service applications;
  8. suspended terminating service where the user has not established a contract with PGW or has not allowed meter access;
  9. stopped performing in home LIURP work and expects to restart such work remotely, via phone contact with customers; and
  10. has been performing extensive Crisis outreach to assist customers in obtaining a Crisis grant and has engaged in an ongoing partnership with DHS' County Assistance Office regarding the extended Crisis program.
2. **QUESTION:** Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted. Utilities are directed to report this information to Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov) in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

**RESPONSE:** PGW recently had a CAP pilot program approved by the Commission which will reduce the percentage of income payment required of CAP customers; it is expected that this program will assist customers impacted by the pandemic and others once it is implemented. PGW expects that it will allow LIURP refusal by CAP customers without removal from CAP through August of 2020.

**D. Consumer Education and Outreach**

1. **QUESTION:** The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and

outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, [thcharles@pa.gov](mailto:thcharles@pa.gov), in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.
- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.
- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.
- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.
- If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.

**RESPONSE:** PGW has utilized multiple outreach efforts:

- PGW Customer Website: <https://www.pgworks.com>,  
[www.pgworks.com/covid19](https://www.pgworks.com/covid19), <https://www.pgworks.com/coronavirus-energy-tips>
- Customer bill inserts and bill messages
- Press releases to media
- Stakeholder newsletters
- Social media messages (Twitter, Instagram, Facebook, Nextdoor and YouTube)
- Television and radio campaign promoting customer assistance programs and conservation methods

- Bill insert provided in all customer bills from PGW President and CEO Craig E. White

[https://www.pgworks.com/uploads/pdfs/Craig\\_letter\\_8.5x11\\_final\\_WEB\\_.pdf](https://www.pgworks.com/uploads/pdfs/Craig_letter_8.5x11_final_WEB_.pdf)

With respect to public input hearings, PGW has utilized social media posts and its website

<https://www.pgworks.com/residential/customer-care/value>.