



VIA ELECTRONIC FILING

October 2, 2020

Rosemary Chiavetta, Executive Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Docket No. M-2018-3003177 - Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024; Docket No. M-2020-3021343 - Peoples Gas Company LLC Universal and Energy Conservation Plan for 2019-2024; Docket No. P-2019-3007044 - Petition of Peoples Natural Gas Company LLC – to Modify the Budget for the Equitable Division; Docket No. P-2020-3017641 - Amendment to Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015-2018; and Docket No. M-2014-2432515 - Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015-2018

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC, enclosed please find a revision to pages 2 and 7 of the Universal Service and Energy Conservation Plan for 2019-2024 (the “Plan”). In the Plan, Peoples made reference to a planned partnership with Duquesne Light which would permit the sharing of customer information between the two Companies to facilitate Customer enrollments in the customer assistance programs (“CAP”) offered by each utility. The attached revised pages 2 and 7 removes the partnership language. It is the intention of Peoples and Duquesne Light to collaborate on their respective CAPs with the objective to enhance the experience for their mutual low-income customers, including enabling data and document sharing to reduce barriers to enrollment; develop a universal CAP application; and investigate methods of shared recertification that decreases the number of CAP customers removed from CAP for failure to recertify. However, as this collaboration is in its early stages and has not yet resulted in a firm process for sharing customer information, this particular provision of the Plan is being removed until such process is fully developed. Once collaboration between Peoples and Duquesne Light results in a fully developed plan, Peoples will file to request an amendment to the the currently effective USECP.

If you have any questions or concerns regarding this matter, please do not hesitate to contact the undersigned at (412) 208-6834 or Rita Black at (412) 208-6530

Very truly yours,

Jennifer L. Petrisek, Sr. Counsel

cc: Joseph Magee, BCS – jmagee@pa.gov
Jennifer Johnson, BCS – jennifjohn@pa.gov
Louise Fink Smith, Esq. – finksmith@pa.gov

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peoples Natural Gas Company LLC Universal :
Service and Energy Conservation Plan for 2019-2024 : Docket No. M-2018-3003177

Peoples Gas Company LLC Universal and Energy :
Conservation Plan for 2019-2024 : Docket No. M-2020-3021343

Petition of Peoples Natural Gas Company LLC - :
to Modify the Budget for the Equitable Division : Docket No. P-2019-3007044

Amendment to Peoples Natural Gas Company LLC :
Universal Service and Energy Conservation Plan for :
2015-2018 : Docket No. P-2020-3017641

Peoples Natural Gas Co. LLC Universal Service :
and Energy Conservation Plan for 2015-2018 : Docket No. M-2014-2432515

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the Revised Pages to the USECP have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

Christy Appleby, Esq.
Philip Demanchick, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Email Address: cappleby@paoca.org
pdemanchick@paoca.org

Richard Kanaskie, Director
Bureau of Investigation and Enforcement
P.O. Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor
West Harrisburg, PA 17105
Email Address: RKANASKIE@pa.gov

John R. Evans, Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
Email Address: jorevan@pa.gov

Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Email Address: emarxPULP@palegalaid.net

Alexis Bechtel, Director
Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105
Email Address: abechtel@pa.gov



Jennifer L. Petrisek
Dated this 2nd day of October, 2020.

Plan Submission

This Plan will be in effect during the period from January 1, 2019 through December 31, 2021 and will be implemented upon approval by the Commission.

Plan Modifications

This Plan contains budgets and descriptions of the Universal Service programs offered by Peoples Gas Company LLC (formerly Peoples TWP) which is an affiliate of Peoples Natural Gas. As a small Natural Gas Distribution Company in Pennsylvania, Peoples Gas Company LLC is not required to submit a formal Plan for approval. However, because the processes and procedures of the Plan are so closely tied to that of Peoples Natural Gas, and because the third party administrators for the programs are the same, the Company has chosen to include information on both companies' programs in this Plan.

The proposed modifications, which are highlighted below, represent the Company's efforts to continually improve the effectiveness and efficiency of its Universal Service Program offerings. Proposed changes were developed from feedback received in the Independent Evaluation of 2017 and the input of the Company's USAG. The CAP Plus modification provided in this Plan was developed following data analysis and discussion of a working group whose members were Office of Consumer Advocate, PA PUC Office of Investigation and Enforcement and members of Public Utility Law Project (PULP). This CAP Plus modification is intended as an interim measure to positively impact affordability until the Commission provides further guidance regarding CAP designs following its study of affordability in Pennsylvania.

Customer Assistance Program

- ~~• Partnership with Duquesne Light to assist customers in enrolling in CAP for both companies with one income documentation submission.~~
- The CAP Plus calculation has been modified in an effort to maintain the affordability of CAP. The CAP Plus amount will continue to be calculated under the same methodology (i.e. LIHEAP receipts divided by CAP participants to arrive at a monthly CAP Plus charge), however the level of CAP Plus added to CAP participant bills will be limited to \$5 if the calculated amount exceeds \$5.
- Provision added to allow customers to re-enter CAP up to 9 months after termination or removal, maintaining the same pre-CAP amount as existed prior to their exit.
- Limit the use of LIHEAP receipts in lieu of providing income documentation for CAP enrollment to those funds received in the current (or prior if the season has recently closed) LIHEAP season. This reduces the timeframe for which LIHEAP receipts can be used to indicate eligibility from 2 years to approximately one year.

CARES/Hardship Funds

- Company will make all efforts to partner with electric companies to provide services to vulnerable customers within the residence to obtain documentation for possible programs participation and provide resources.

Upon contact, a customer may be enrolled in CAP without providing income documentation if he/she has received a LIHEAP payment within the current or most recent LIHEAP program year. Peoples will accept a customer's participation in an electric or water CAP program as verification of income if the customer provides authorization for the CAP administrator to utilize income documentation submitted by the customer to enroll in another CAP program managed by the administrator (i.e. First Energy, Pennsylvania American Water) or authorizes another utility CAP program to share income information for the purposes of enrollment. ~~If a customer enrolls in Duquesne Light's CAP program and provides their permission for their information to be shared, the Company will receive the customer's information from Duquesne Light and will complete enrollment on behalf of the customer.~~ The customer may submit income for the past 30 days or 12 months, whichever is more beneficial to the household, for the determination of eligibility to participate in CAP.

The Company will follow its collections procedures for customers who fail to meet their CAP payments in a timely manner. In all cases, the Company reserves the right to delay termination based on individual, extraordinary customer circumstances.

Low Income Home Energy Assistance Program – LIHEAP Coordination

The LIHEAP and LIHEAP Crisis Program provide grants to eligible households to help with their utility bills. CAP participants should apply for LIHEAP and the Company provides information on how to apply for the grants. The Company mails annual reminder letter to CAP participants who have not yet received a LIHEAP grant within the program year. CAP participants are asked to direct payment of any LIHEAP cash benefit grant that they receive to Peoples. The LIHEAP Crisis Grant may be requested contingent upon state developed criteria and would be applied consistent with state guidelines.

Current Program Benefits

- Affordable monthly payments based on ability to pay.
- Monthly CAP credits.
- Monthly arrearage forgiveness when timely CAP payments are received.
- Exemption from late payment charges and waived security deposits for CAP eligible applicants.
- Referrals to other Universal Service programs and assistance programs

Payment Plan

Peoples utilizes a "Percent of Income Payment Plan" to establish a customer's monthly payment. Applicants must provide proof of household income when applying for the CAP program unless