



October 20, 2020

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

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

Comments of CAUSE-PA

Dear Secretary Chiavetta,

Pursuant to the Tentative Order entered August 27, 2020 by the Pennsylvania Public Utility Commission in the above noted dockets, enclosed please find the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)**.

Respectfully Submitted,
Counsel for CAUSE-PA

A handwritten signature in blue ink that reads "Elizabeth R. Marx".

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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 I have this day served copies of the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in accordance with the requirements of 52 Pa. Code § 1.54, as modified by the Commission's March 20, 2020 Emergency Order, in the manner and upon the persons listed below.

VIA EMAIL

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Respectfully Submitted,



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October 20, 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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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

**COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT

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October 20, 2020

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its attorneys at the Pennsylvania Utility Law Project, submits these Comments pursuant to the August 27, 2020 Tentative Order (TO), which invited interested parties to submit comments and reply comments to the Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019 - 2024 (Peoples USECP or Plan).

CAUSE-PA is a statewide unincorporated association of low-income individuals which advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services. CAUSE-PA membership is open to moderate and low-income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families maintain affordable access to utility services and achieve economic independence and family well-being. CAUSE-PA is therefore interested in and committed to achieving the creation, development, and implementation of effective universal service and energy efficiency programs which promote long term affordability of electricity, natural gas, water, wastewater, and communication services and, in turn, protect the health, safety, and welfare of economically vulnerable households across the state.

The Commission's TO requested that Peoples clarify several aspects of its USECP, and sought comment from interested stakeholders on other Plan components. In response thereto, CAUSE-PA offers the following comments.

II. BACKGROUND

On July 16, 2014, Peoples Natural Gas Company LLC submitted its USECP for the period of 2015-2018 (2015-2018 USECP) for both Peoples Natural Gas Company LLC and

the Equitable Division of Peoples Natural Gas Company LLC (together, Peoples).¹ On December 17, 2015, the Commission approved Peoples' 2015-2018 USECP.²

On July 2, 2018, Peoples filed a proposed USECP for the period of 2019-2021. On October 3, 2019, the Commission issued an Order at Docket No. M-2019-3012601 amending the USECP filing and independent evaluation schedules, and Peoples subsequently extended the proposed effective period for its pending USECP from 2019-2021 to 2019-2024.³ While Peoples' 2015-2018 USECP was set to expire on December 31, 2018, it nevertheless remains effective until Peoples' pending USECP (2019-2024 USECP) is approved by the Commission.

On November 5, 2019, and after extensive statewide inquiry and investigation through the course of two separately docketed proceedings, the Commission entered a Final Policy Statement and Order at Docket No. M-2019-3012599 (Final CAP Policy Statement and Order), which made a number of critical reforms to the Commission's formal Customer Assistance Program (CAP) Policy Statement at 52 Pa. Code §§ 69.261-.267.⁴ Once implemented, these reforms will help to correct longstanding unaffordability within CAP.⁵

¹ Peoples Natural Gas Co. LLC Universal Service and Energy Conservation Plan for 2015-2018, Docket No. M-2014-2432515 (final order entered Dec. 17, 2015).

² Id.

³ See Universal Service and Energy Conservation Plan (USECP) Filing Schedule and Independent Evaluation Filing Schedule, Docket No. M-2019-3012601, at 15-16 (order entered Oct. 3, 2019).

⁴ 2019 Amendments to CAP Policy Statement, Final Policy Statement and Order, Docket No. M-2019-3012599 (order entered Nov. 5, 2019) (hereinafter Final CAP Policy Statement and Order).

⁵ Peoples USECPs incorporates its plan to implement revisions to the Commission's Final CAP Policy Statement and Order. Prime among these changes is the reduced energy burdens for those customers at 0-150% of the FPL. As noted in the Commission's Final CAP Policy Statement and Order, existing energy burdens were unreasonable, unaffordable, and inconsistent with the Commission's statutory obligation to ensure low income customers are able to maintain utility service in their homes. Other changes in response to the Final CAP Policy Statement and Order include tracking and reporting customers who change residences to allow for CAP eligibility to automatically

To effectuate implementation of the Commission's revised CAP Policy Statement, the Commission's Final CAP Policy Statement and Order directed each utility to file and serve an addendum to their existing or proposed Universal Service and Energy Conservation Plan (USECP) within 60 days, indicating whether the utility's existing or pending USECP was consistent with the amended CAP Policy Statement and, if not, whether and how the utility would implement the policy changes specified in the amended CAP Policy Statement.⁶

Peoples filed several revisions to its current and proposed USECPs. On January 3, 2020 (as filed with the Commission on January 6, 2020), Peoples filed an Addendum to its 2015-2018 USECP, incorporating many of the changes set forth in the Commission's Final CAP Policy Statement and Order.⁷ Pursuant to a Joint Settlement in the Joint Application of Aqua and Peoples for approval of Aqua's acquisition of Peoples,⁸ Peoples filed additional amendments to its 2015-2018 USECP on April 24, 2020, which proposed to further modify its CAP, Emergency Furnace and Service Line Repair (EFSLR) program, and Hardship Fund program budgets and provides Hardship Fund enrollment projections.⁹ Peoples filed a third

transfer (within the Peoples service territory), eliminating the "payment troubled" criteria for CAP eligibility (for those with income 0-150% of the FPL), accepting income documentation of at least the last 30 days or 12 months at application or recertification (whichever is more beneficial to the customer), creating an online application, adoption of maximum recertification timeframes, eliminating the provision that customers direct LIHEAP grants to the utilities sponsoring CAP, exempting CAP customers from late payment charges, and PPA forgiveness.

⁶ Final CAP Policy Statement and Order at 106.

⁷ Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024, Addendum to Universal Service and Energy Conservation Plan, Docket No. M-2018-3003177 (filed January 6, 2020).

⁸ Joint Application of Aqua America Inc., Aqua Pennsylvania Inc., Aqua Pennsylvania Wastewater Inc., and Peoples Natural Gas Company LLC for All of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America Inc., Opinion and Order, Docket No. A-2018-3006061 (filed January 24, 2020).

⁹ Amendment to Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015-2018, Docket No. P-2020-3017641 (filed April 24, 2020).

amendment to its 2015-2018 USECP on May 8, 2020, with additional modifications to the description of eligibility for the EFSLR program.¹⁰ Peoples also proposed to amend its pending 2019-2024 USECPs consistent with the amendments proposed to its 2015-2018 USECP in the above noted filings. In an attempt to help simplify the procedural complications created by Peoples' proposals to amend its 2015-2018 USECP as well as its proposed USECP, CAUSE-PA will discuss all of Peoples' pending proposals to amend its USECPs (current and pending) in the context of its pending USECP. To the extent the Commission approves Peoples' proposed USECP amendments, we urge the Commission to be clear that any approved reforms will be effective for both the current and proposed USECPs to avoid possible delays in implementation.

On August 27, 2020, the Commission issued a Tentative Order (TO), seeking additional information from Peoples related to its proposals and soliciting comments and reply comments from interested parties. In response to the TO, Peoples filed supplemental information on September 16, 2020.¹¹

Peoples has demonstrated, through the multiple filings detailed above, that most aspects of its proposed amended USECPs are consistent with all applicable laws and policies, are in the public interest, and should be approved. As such, and consistent with the below comments and CAUSE-PA's previously filed Answer to Peoples' Petition to Amend its 2015-2018 USECP,¹²

¹⁰ Amendment to Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015-2018, Docket No. P-2020-3017641, at pages 20 – 22 (filed May 8, 2020).

¹¹ Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024, Supplemental Information, Docket No. M-2018-3003177 (filed September 16, 2020) (hereinafter Peoples Supplemental Information).

¹² Peoples Natural Gas Company LLC Petition to Amend Its Universal Service and Energy Conservation Plan for 2015-2018, Answer of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania in Support of Peoples Natural Gas Company LLC's Petition to Amend Its Universal Service and Energy Conservation Plan for 2015-2018, Docket No. P-2020-3017641 (filed March 2, 2020).

CAUSE-PA urges the Commission to approve Peoples' proposed USECPs to the extent those revisions are consistent with and in furtherance of the Commission's CAP Policy Statement.

Nevertheless, as we discuss in our comments below, certain aspects of Peoples proposed USECPs require further consideration. Specifically, concerns requiring further review include Peoples' continued inclusion of unearned child income for certain CAP eligibility determinations, eligibility requirements for hardship grants included in contract language (outside of the USECP formal review and approval process), rollout of the online application, consideration of tiered CAP credit limits (if CAP credit limits are to be enforced through program removal), consumer education and outreach during the COVID-19 national public health emergency, CAP final bill procedures, and reconnection policies for CAP eligible customers.

While acknowledging the remaining concerns with the USECPs as identified above and throughout, and the need to fully address and resolve those concerns, CAUSE-PA nevertheless urges swift implementation of the Peoples' amended USECPs to ensure the important revisions made consistent with the CAP Policy statement are implemented quickly and without delay. We believe all concerns raised in these comments can and should be resolved in a timely fashion for implementation of the USECPs to proceed expeditiously.

It is particularly critical that Peoples be approved to implement much of the relief contained in its USECP without delay to help respond to the economic crisis which continues to unfold as a result of COVID-19. While always of critical import, the need to address chronic and categorical unaffordability within CAP is even more pressing now as hundreds of thousands of Pennsylvanians are profoundly struggling to afford basic life necessities in the wake of the COVID-19 crisis. Ongoing unaffordability is only serving to exacerbate this crisis, and should be remediated without delay. We further note that finalizing these USECPs will allow the

Commission, Peoples, and interested stakeholders to obtain invaluable data to inform the pending universal service rulemaking. Implementation and reporting on Peoples' progress will provide data necessary to fully vet the rulemaking, allowing for stakeholders to present informed comments and ultimately strengthening USECPs for all utilities. Therefore, following resolution of the issues raised below, we recommend approval of Peoples' amended USECPs without delay.

III. COMMENTS

CAUSE-PA submits the following comments for consideration regarding the various program amendments provided in the Peoples USECP. For ease of review, CAUSE-PA's comments follow the structure of the Commission's Tentative Order, and responds in turn to the issues and analysis included therein.

1. CAP

a. CAUSE-PA supports continuation of Peoples' E-CAP as a pilot program, at the proposed 7% energy burden level, with enhanced data collection.

As the Commission explained in its TO, Peoples E-CAP was approved on a pilot basis in its 2015 USECP proceeding. (TO at 22). In addition to arrearage forgiveness for each full bill payment while enrolled in the program, E-CAP improves ongoing affordability by providing participants with a bill for the lower of their average bill or a percentage of income bill targeted to 11% of household income, with an additional \$5/month arrearage co-payment and a monthly CAP Plus charge. (Id.) The Commission set forth three criteria for evaluation of Peoples' E-CAP pilot, including whether E-CAP "(1) demonstrates a need by meeting projected enrollment levels, (2) improves payment behavior and decreases default rate for its participants, and (3) reduces the utilities' bad debt and credit/collections costs." (TO at 22).

In its 2019-2024 USECP, Peoples proposed to fully integrate E-CAP into its CAP, and to decrease the applicable energy burden from 11% to 7% of household income. (TO at 23).

In its TO, noting an anticipated increase in CAP costs to comply with the reforms contained in the Commission’s revised CAP Policy Statement, the Commission raised concerns about Peoples’ proposal to continue its E-CAP and formally incorporate the expanded assistance into its CAP. (TO at 24). The Commission noted that the bill discount component of E-CAP was anticipated to be “minimal” in light of the relatively high 11% energy burden threshold set for this group. (TO at 24). However, in 2017, E-CAP participants received approximately \$785,000 in CAP credits – in addition to nearly \$666,000 in arrearage forgiveness. (Id.) To better assess Peoples’ proposal to incorporate its E-CAP into its USECP, the Commission ordered Peoples to provide supplemental data and information pertaining to past and projected E-CAP enrollment and expenditures, as well as an analysis of the impact of E-CAP on payment behavior and credit and collections. (TO at 26-27).

In its Supplemental Information, Peoples provided additional data and information about its E-CAP. Peoples noted that E-CAP has had a “[s]mall, statistically significant reduction in the number of collection calls” as well as a “[s]ignificant decline in the number of letters, calls and terminations.” (Peoples Supplemental Information at Attachment A). Peoples also provided the following aggregate annual information about its E-CAP expenditures and enrollment:

E-CAP Enrollment and Expenditures: 2016-2019

Year	# E-CAP Customers	PPA Forgiveness	CAP Credits	PPA Reduction	E-CAP Payments
2016	1,278	\$300,715	\$207,689	\$395,376	\$968,668
2017	1,594	\$665,909	\$784,571	\$601,863	\$1.6 mil.+
2018	2,376	\$499,771	\$325,576	Not available	\$1.8 mil.+
2019	2,427	\$337,948	\$235,031	Not available	\$2 mil.+

There are a number of critical observations to make in reviewing the information Peoples provided about its E-CAP, each of which support the conclusion that Peoples E-CAP should continue to offer critical rate and arrearage relief to economically vulnerable consumers with income between 151-200% FPL. In short, the available data suggests – though is not conclusive – that E-CAP has met the three criteria the Commission set forth in its approval of Peoples’ pilot: (1) demonstrated need, (2) improved payment behavior, and (3) reduced collections expenses.

First, the available data suggests the E-CAP expenditures in 2017 highlighted in the Commission’s TO were substantially higher than the average annual expenditure, indicating a possible anomaly in the reported data. Annual expenditures in the other three years – 2016, 2018, and 2019, were much lower – consistent with the anticipation that costs for E-CAP would be relatively minimal. Even if not an anomaly in the applicable data, CAP credit expenditures within E-CAP would only be high if E-CAP participants’ average bill amount is *in excess* of 11% of their annual gross household income on natural gas costs alone, thereby triggering the need for CAP credits to offset the participants’ monthly bill. If this is the case, it would strongly support a conclusion that the E-CAP is necessary and needed to ensure universal access to natural gas service at an affordable rate, consistent with the Commission’s obligations under the Natural Gas Choice and Competition Act (Choice Act).¹³ Based on the structure of E-CAP, which generally requires E-CAP participants to have significant arrears (\$800 or more) in order to participate, it is not surprising that there could be higher CAP credits in some years – especially in years when the weather is colder than normal. Households with substantial arrears often have higher than average usage rates, and experience greater difficulty keeping up with their bills.

¹³ See 66 Pa. C.S. §§ 2202, 2203(8) (“The commission shall ensure that universal service and energy conservation policies, activities and services are appropriately funded and available in each natural gas distribution service territory.”)

Second, the continued growth in E-CAP enrollment year over year is also relevant, as it evidences a true need for assistance – both to address unaffordable arrears and to improve ongoing bill affordability for those at 151-200% FPL.

Third, as Peoples’ highlights, the data presented offers promising results in terms of reduced collections activities for E-CAP participants. But it also underscores the need for additional analysis and information to fully and appropriately assess the effectiveness of E-CAP at improving bill payment and reducing collections costs. The number of *partial* and *in-full* payments by E-CAP customers, for example, is important to help determine whether E-CAP is effective to improve payment behavior and further reduce collections costs. In response to discovery propounded by OCA, Peoples provided a breakdown of in-full payment rates by income tier.¹⁴ On its face, this data suggests that E-CAP customers have a lower payment completion rate compared to other CAP tiers. However, this data is also limited in its applicability, as it does not provide the number of *partial* payments made by E-CAP customers. Information about partial payments is important, as it would show whether E-CAP rates are appropriately targeted to remediate ongoing unaffordability for customers in this income tier. At the current 11% threshold – with additional arrearage co-payment fees – CAUSE-PA questions whether the existing E-CAP threshold is affordable, even at this slightly higher income level. As the Commission has previously found, 4% is the average *combined* (gas and electric) residential energy burden.¹⁵

In prior comments on this matter, CAUSE-PA argued that more data was needed to support expanding income-eligibility requirements for CAP when there exists a persistent and essentially

¹⁴ See Appendix A, OCA to Peoples I-2 & I-3.

¹⁵ Final CAP Policy Statement and Order at 16.

unmet need of households below 150% of the federal poverty level in Peoples' service territory.¹⁶ CAUSE-PA evaluated the data Peoples' provided in response to this TO, and believes Peoples has demonstrated that E-CAP provides important rate assistance to address affordability needs of economically vulnerable consumers. However, we continue to strongly assert that expanded assistance through CAP to households in this additional income bracket must not interfere with or undercut the ability of CAP to fully address the affordability needs of those with the greatest financial hardship.

In light of the available information, CAUSE-PA recommends at this time that E-CAP remain a pilot program for the duration of the 2019-2024 USECP to better understand the impact of E-CAP on CAP – especially in light of the other changes proposed to Peoples' CAP to improve the affordability and accessibility of both CAP and E-CAP. Providing stable and accessible rate relief to customers with income just above traditional CAP income guidelines is particularly important now, during the COVID-19 national public health emergency, to ensure that all Pennsylvanians are able to afford life-sustaining utility service to their home.¹⁷ From available data, it appears as though E-CAP is fulfilling a critical need for rate relief to prevent termination of service to those with income between 151-200% FPL, while having a measurable impact on Peoples' collections costs. We therefore support the continuation of E-CAP as a pilot program at this time. In the interim, we recommend that Peoples work with its Universal Service Advisory Group (USAG) to identify expanded metrics which may allow for a more in-depth analysis of the program, including but not limited to the partial payment rate by E-CAP participants.

¹⁶ Peoples Natural Gas Co. LLC Universal Service and Energy Conservation Plan for 2015-2018, Comments of CAUSE-PA, Docket No. M-2014-2432515 (filed October 7, 2015)

¹⁷ See United Way of Pennsylvania, ALICE in Pennsylvania: A Financial Hardship Study (2019), <https://www.uwp.org/wp-content/uploads/ALICE-Report.pdf> (approximately 37% of Pennsylvania households are already unable to meet their basic living expenses).

Further, CAUSE-PA supports continuation of additional qualifiers for E-CAP participation by consumers in the higher-income bracket; namely, that E-CAP customers must have accrued arrearages and must apply for a Hardship Grant prior to entering E-CAP. In balance, we believe these added requirements to be fair for this higher income bracket, and will help ensure that E-CAP is targeted to the greatest needs and does not undercut or erode the availability of CAP for those with the greatest financial needs.

Finally, CAUSE-PA supports the proposed energy burden reduction from 11% to 7% for those in the 151-200% FPL income bracket, also on a pilot basis. As Peoples notes in its response to the TO, the cost of reducing the energy burden for E-CAP customers will be limited because “most participants in the 151 to 200% FPIG level will continue to pay the average bill rather than their percentage of income, even when the applicable percentage is reduced to 7%.” (Peoples Supplemental Information at 9). On the other hand, for those limited E-CAP customers paying in excess of 7% of their income on natural gas costs alone, the reduction in applicable energy burden will provide critically important assistance to help improve bill payment and reduce additional accumulation of unaffordable arrears.

Peoples E-CAP pilot, from reported data, appears to be a sustainable program that helps to meet energy affordability needs of this slightly higher income group without diminishing CAP for those with the greatest financial needs. However, more analysis is needed to fully assess whether and to what extent E-CAP is effectively designed to serve the needs of this population. CAUSE-PA therefore recommends that E-CAP continue as a pilot program at this time, with additional data and reporting requirements for the Commission and stakeholders to better ascertain whether E-CAP should be formally incorporated into Peoples CAP in the context of its next USECP proceeding.

b. CAUSE-PA urges prompt adoption of Peoples’ proposal to reduce its energy burden standards and eliminate its CAP Plus and PPA fees, consistent with the Commission’s CAP Policy Statement.

CAUSE-PA unequivocally supports Peoples’ proposal to reduce its energy burden standards consistent with the Commission’s CAP Policy Statement. (TO at 27.)¹⁸ As the Commission has concluded, the prior energy burden standards “do not reflect reasonable or affordable payments for many low-income customers” – especially for those with income at or below 50% of the Federal Poverty Level (FPL).¹⁹ Thus, failure to approve Peoples’ proposal to adjust its energy burden standards – which were set in accordance with the Commission’s prior energy burden standards – would impose *categorically* unreasonable and unaffordable rates on CAP customers. Such a result would be in direct contravention with the Commission’s obligations under the Choice Act,²⁰ as well as its duty to ensure that all rates are just, reasonable, and in conformance with all applicable regulations and orders of the Commission.²¹

CAUSE-PA previously explained its strong support for swift implementation of the Commission’s reduced energy burden standards in its formal Answer to Peoples’ Petition to Amend its 2015-2018 USECP, and set forth the critical need for improved affordability within CAP in great detail through the Commission’s statewide investigation into the state of universal service programming and its study of energy affordability for low income consumers in

¹⁸ 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261- 69.267, Final Policy Statement and Order, Docket No. M-2019-3012599 (order entered Nov. 5, 2019).

¹⁹ Final CAP Policy Statement and Order at 27, 29-30.

²⁰ See 66 Pa. C.S. §§ 2202, 2203(8).

²¹ 66 Pa. C.S. § 1301(a) (“Every rate made, demanded, or received by any public utility ... shall be just and reasonable, and in conformity with regulations or orders of the Commission.”).

Pennsylvania.²² For the sake of brevity, CAUSE-PA will not reiterate those lengthy arguments in full here, and instead incorporates those filings by reference herein.²³ In short, low income households do not have adequate income to pay for basic life necessities and frequently must decide between paying for utility service or paying for essential medical care, food, clothing, and other basic necessities required for survival.²⁴ Continuing to charge rates for low income households that the Commission has explicitly found to be unreasonable and unaffordable would be unjust and inconsistent with the clear charge of the Commission to ensure universal access to service.²⁵

CAUSE-PA also strongly encourages the Commission to approve Peoples' proposal to eliminate the \$5 co-payment for CAP customers with PPAs and to remove the CAP Plus charge for all CAP customers. Again, CAUSE-PA's strong support for these elements of Peoples' proposed USECP was already addressed in its previously filed Answer, which CAUSE-PA incorporates by reference herein.²⁶ In short, and consistent with the Commission's Final Policy

²² Peoples Natural Gas Company LLC Petition to Amend Its Universal Service and Energy Conservation Plan for 2015-2018, Answer of CAUSE-PA In Support of Peoples' Petition to Amend Its USECP (filed March 2, 2020) (herein CAUSE-PA Answer).

Review of Universal Service and Energy Conservation Programs, Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, Tenant Union Representative Network, and Action Alliance of Senior Citizens of Greater Philadelphia, Docket No. M-2017-2596907 (filed August 8, 2017);

Energy Affordability for Low-Income Customers in Pennsylvania, Comments of the Tenant Union Representative Networks, Action Alliance of Senior Citizens of Greater Philadelphia and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, Docket No. M-2017-258-7711 (filed May 8, 2019).

²³ Id.

²⁴ See id.; see also Hernández D. (2016). Understanding 'energy insecurity' and why it matters to health. *Social science & medicine* (1982), 167, 1–10. <https://doi.org/10.1016/j.socscimed.2016.08.029>

²⁵ Final CAP Policy Statement and Order at 27.

²⁶ Final CAP Policy Statement and Order at 31 (“[E]ach utility CAP payment plan should be designed to ensure a household’s total CAP bill – including any add-ons such as PPA co-payments or CAP Plus charges – will not exceed the Commission’s energy burden threshold.”).

Statement and Order, CAUSE-PA asserts that these fees force CAP rates to exceed the Commission's energy burden standards, and undercut affordability achieved through the program. Elimination of these fees is therefore critical to ensure that CAP is producing a consistent and predictable level of affordability for CAP participants each and every month.

CAUSE-PA notes that Peoples' proposed USECP still includes references to the \$5 PPA co-payment and the CAP Plus charge. The Commission requested that the Peoples Companies rectify this conflict. We concur that the removal of these charges must be clearly articulated in the final 2019-2024 USECP.

Importantly, as explained in CAUSE-PA's Answer, the cost of implementing the proposed USECP amendments consistent with the Commission's CAP Policy Statement are inherently reasonable – amounting to an additional \$0.27 per month for Peoples Gas customers and \$0.96 per month for Peoples Natural Gas customers, bringing the total monthly cost of CAP per residential customer to \$2.53 for Peoples Gas and \$3.14 for Peoples Natural Gas.²⁷ While any increase in rates must be carefully considered and weighed, CAUSE-PA asserts that – in balance – the increase in the cost of CAP is well worth the benefit of ensuring that economically vulnerable consumers receive a just and reasonable rate.²⁸

Nevertheless, CAUSE-PA asserts that the cost of providing a just, reasonable, and affordable bill to low income customers through CAP is not dispositive of whether the Commission should approve Peoples proposal to reduce its energy burden standards to remediate

²⁷ See CAUSE-PA Answer at 14-15, para. 45-48. Note that Peoples' projections for the cost of its proposals do not appear to have changed since CAUSE-PA conducted this cost analysis in the context of its previously filed Answer. While there may be slight variations, any such variations appear to be limited in scope and overall impact. CAUSE-PA's available time and resources in preparation of these comments did not allow for updated calculations, though we reserve the right to conduct additional analysis in its reply comments as necessary to respond to the arguments advanced by other parties.

²⁸ See CAUSE-PA Answer at 9-10, para. 38.

long-standing unaffordability within the program. As it stands, residential customers remain solely responsible for paying for the cost of CAP, despite the fact that CAPs provide far-ranging benefits to all consumers and the community as a whole. As the Commission has squarely recognized, “poverty, poor housing stock, and other factors that contribute to households struggling to afford utility service are not just ‘residential class’ problems.”²⁹ Rather than potentially undercut the affordability achieved through CAP, CAUSE-PA urges the Commission to address any impact of universal service costs on residential customers by directing Peoples to propose an equitable, nonbypassable, and system-wide cost recovery mechanism for universal service costs in the context of its next base rate proceeding to help alleviate the cost of addressing systemic energy poverty – which to date is borne by residential customers alone.³⁰

Finally, CAUSE-PA supports Peoples’ pledge to use the stakeholder process to review the current minimum payment of \$25 with their USAG. Consistent with CAUSE-PA’s position in prior proceedings, CAUSE-PA asserts that the minimum charge currently in place is arbitrary, and is not based on affordability or costs incurred.³¹ We suggest that it would be more appropriate for the minimum charge to be consistent with Peoples’ applicable residential customer charge, which is generally representative of the incremental cost to Peoples to provide service to a residential customer without respect to usage. Nevertheless, we believe it prudent at this time, and in light of the substantial number of issues in this proceeding, to defer this issue for additional consideration by the members of Peoples’ USAG where the issue can be more fully explored amongst the diverse group of stakeholders that are part of that committee.

²⁹ Final CAP Policy Statement and Order at 90-96.

³⁰ See 66 Pa. C.S. § 2203(6); see also 52 Pa. Code § 69.266(b).

³¹ See *Pa. PUC v. Peoples*, Direct Testimony of Harry Geller on Behalf of CAUSE-PA, Docket No. 2018-3006818, at 34-35 (served April 29, 2019).

- c. *CAUSE-PA supports Peoples’ proposal to allow moving customers to maintain CAP status without interruption, but recommends the Commission impose a deadline for implementation of this reform.*

Relocation can be a particularly stressful time for individuals and families, and causes households to incur substantial additional costs associated with a move. This is particularly true for low income families, who relocate more frequently than higher income households – either voluntarily or by force.³² Ensuring a seamless transition of CAP benefits helps to keep relocation costs low, and ensures that families do not incur additional stress to reapply for the program in the middle of a move.

CAUSE-PA supports Peoples’ proposed process for identifying CAP customers who moved to another address within their territory but did not alert Peoples of their CAP status in order for the CAP enrollment to be transferred. (TO at 29). Peoples indicated that its process would be in place by June 30, 2020. While the Commission requested that Peoples provide an update on the status of implementation, CAUSE-PA could not find anything in Peoples’ Supplemental Information indicating that this process is now operational. (*Id.*) CAUSE-PA recommends that the Commission confirm with Peoples that this process has been implemented. If Peoples has not yet implemented this process, CAUSE-PA recommends that the Commission set a deadline of not more than 90 days from the date of a final order in this proceeding for implementation of Peoples’ proposed CAP moving procedures. While we are sensitive to the time constraints associated with COVID-19, it is important to set a clear timeframe for compliance with this important reform. We

³² Phinney, R. (2013). Exploring Residential Mobility among Low-Income Families. *Social Service Review*, 87(4), 780-815. doi:10.1086/673963

further recommend that the Commission require Peoples to provide periodic updates about this process, including the number of moving customers each quarter, at its USAG.

- d. CAUSE-PA supports Peoples proposal to calculate income based on the last 30 days or 12 months, whichever is more beneficial, and to train CAP agencies accordingly, though we recommend further clarification.*

CAUSE-PA supports Peoples' proposal to provide CAP customers with the option to provide 30 days or 12 months of income, whichever is most beneficial for the customer's situation. (TO at 30). We also support Peoples' proposal to train Dollar Energy Fund (DEF), its CAP administrator, to inform CAP applicants of this option. However, CAUSE-PA would like to better understand the training protocol that will be provided to DEF customer service staff and, thereby, how this change will be communicated to CAP customers.

CAUSE-PA aims to ensure that all eligible customers are able to enroll in CAP without facing undue barriers or obstacles to participation. We understand DEF agents will be instructed to advise CAP customers to provide 30 days or 12-months of income. However, it is not clear how this information will be communicated, and whether assistance will be provided to applicants to help determine the more beneficial rate.

CAUSE-PA recommends that Peoples train DEF staff to assist customers in deciding which option would be more beneficial, as that may not be clear to the applicant. For example, if a customer has seasonal employment and will only work for a portion of the year, basing CAP eligibility on the last 30 days may not accurately reflect the customer's ability to pay for a 12-month time period. DEF staff should be trained to communicate with customers to help them determine the best possible option to ensure all those who are eligible can enroll. There are a number of standardized questions that could help consumers to make this determination, such as:

- "Were you or a member of your household unemployed in the last 12 months?"

- “Did you or a member of your household have your hours reduced in the last 12 months?”
- “Are you or a member of your household a seasonal worker?”

A full assessment may also require asking additional questions and engaging in dialogue beyond what is easily scripted. CAUSE-PA recommends including this additional level of training to DEF agents to help ensure that DEF is assisting all eligible customers to enroll in the program.

e. CAUSE-PA supports Peoples’ proposal to eliminate its “payment troubled” criteria for CAP eligibility

CAUSE-PA recommends approval of Peoples’ proposal to eliminate “payment troubled” criteria for CAP eligibility. Removing this criterion for eligibility allows Peoples’ to comply with the guidance issued in the Commission’s revised CAP Policy Statement. (TO at 31). As discussed at length in prior filings, households with income that is at or below 150% FPL most often have inadequate resources to afford and maintain energy services without assistance and regularly forego other basic life necessities in order to afford energy services to their home.³³ Households at this income level should be categorically eligible for CAP, and should not be required to fall behind on their bill and accrue arrearages before being eligible for a reduced bill based on their income level. Taking this proactive approach to affordability is likely to result in reduced arrearages and more households successfully enrolled in CAP, as they will be better able to cover the cost of more affordable utility service payments. Indeed, an ounce of prevention is worth a pound of cure. As such, Peoples’ proposal to eliminate the “payment trouble” requirement should be approved.

³³ Peoples Natural Gas Co. LLC Universal Service and Energy Conservation Plan for 2015-2018, Comments of CAUSE-PA, Docket No. M-2014-2432515 (filed October 7, 2015).

f. CAUSE-PA supports Peoples’ proposal to eliminate the requirement that CAP customers direct their LIHEAP grant to Peoples.

CAUSE-PA supports Peoples’ proposal to eliminate the provision in its USECP that customers direct their LIHEAP grants to Peoples. (TO at 31). As the Commission explained in adopting this revision in its CAP Policy Statement, CAP customers are not necessarily eligible to receive a LIHEAP grant.³⁴ Even if eligible, applicants are nevertheless limited to one LIHEAP cash grant for either electric or gas utility service, not both, regardless of whether they are enrolled in CAP for both utilities – or rely on deliverable fuel as a primary heating source for their home.³⁵ Further, while LIHEAP has been a reliable federally funded program for several decades, there is no guarantee that LIHEAP will be available every year – nor is there a guarantee that LIHEAP will be funded at a certain level.³⁶ For these reasons, we support the elimination of this provision, and urge the Commission to approve the reform without delay consistent with the Commission’s CAP Policy Statement.

g. CAUSE-PA opposes Peoples’ proposal to remove customers from CAP if they exceed \$1,000 in annual CAP credits and their usage is deemed “unjustified”, and recommends the maximum CAP credit limit be further examined before changes are made to its existing policy.

As stated in comments to the 2015-2018 USECP Final Order, CAUSE-PA supports Peoples’ current practice of using the CAP credit maximum threshold as a trigger for review of household usage, rather than applying a strict maximum CAP credit limit. (TO at 32.) We also

³⁴ Final CAP Policy Statement and Order at 50-51.

³⁵ *Id.*

³⁶ The current administration has proposed to cut LIHEAP funding in its entirety in each of the last three years. See, e.g. LIHEAP.org, LIHEAP News Alert: Administration’s Budget Proposes Significant Cuts to HHS Programs (March 12, 2019), <https://www.liheap.org/news/2019/3/12/liheap-news-alert-administrations-budget-proposes-significant-cuts-to-hhs-programs>.

support the notification and review processes currently employed by Peoples, as we believe this is a fair control measure to ensure that households with high usage are not unfairly penalized if they are unable to reasonably control their usage – either due to medically related usage, inadequate heating system, poor housing stock, addition of a family member, or another reason that may constitute a justifiable reason for the household to exceed the maximum threshold.

CAUSE-PA is very concerned, however, that adding the option for removal from CAP, especially in light of Peoples’ relatively low CAP credit maximum threshold of \$1,000, will result in diminished CAP participation, accrual of substantial arrears, and negative health and financial impacts on vulnerable households – all of which would substantially undercut program effectiveness. These negative impacts are likely to fall most harshly on the lowest income customers, as these households require additional resources in order to reach an affordable bill. Peoples’ proposed investigation and removal process may also result in substantial additional administrative costs in order to investigate a greater number of households that will more easily reach the \$1,000 limit as a result of the reduction in energy burden standards. Since October 2018, Peoples has conducted 1,227 high usage investigations, of which just 28 CAP customers (2.3%) were found to have unjustifiably high usage.³⁷ At the current maximum threshold of \$1,000, the number of investigations is likely to be substantially higher – especially for the lowest income customers that require the greatest level of assistance.

Peoples’ current \$1,000 maximum CAP credit limit is not much higher than the \$840 threshold for gas heating originally set in the Commission’s former CAP Policy Statement nearly three decades ago, in 1992.³⁸ As the Commission recognized in its Final Policy Statement and

³⁷ See Appendix A, OCA to Peoples I-10 & I-11.

³⁸ Final CAP Policy Statement and Order at 57.

Order, “the limits established in 1992 are no longer an adequate mechanism to address energy burdens and affordability.”³⁹ In making its determination that the 1992 standards are inadequate,

Commission found:

[I]t is reasonable to allow utilities to establish and propose changes to their CAP credit limits, **subject to justification on the record**, as part of their USECPs. This will give a utility and stakeholders the flexibility to adapt the limits based on the energy costs and needs in the utility’s service territory.⁴⁰

Peoples has not provided any justification for its proposal to continue to apply a \$1,000 maximum CAP credit limit, notwithstanding its proposal to substantially decrease the applicable energy burden standards. It has not conducted any analysis to determine the impact of this low maximum CAP credit threshold on CAP customers (especially those in the lowest income tier), the rate at which CAP customers may now exceed this low maximum CAP credit threshold, or the impact that imposition of this low maximum CAP credit threshold will have on Peoples’ administrative costs in order to conduct an increased number of investigations.⁴¹

CAUSE-PA strongly urges the Commission to reject Peoples’ proposal to remove customers from CAP for exceeding the current \$1,000 maximum CAP credit limit. Rather, and consistent with Peoples’ proposal with regard to its current *minimum* CAP payment threshold, CAUSE-PA recommends that the Commission instruct Peoples to work with its USAG to evaluate its current *maximum* CAP credit threshold in light of the reduction in energy burden standards. Peoples should be instructed to specifically examine the impact of the current threshold on each income tier, and should consider adoption of an appropriately tiered credit threshold that will not

³⁹ *Id.* at 60.

⁴⁰ *Id.* (emphasis added).

⁴¹ In response to discovery, Peoples noted that DEF – which completes its high usage investigations, does not currently track the information by income tier, making it difficult for Peoples to fully appreciate the disproportionate impact its current system may already have on its lowest income customers. *See* Appendix A, OCA to Peoples I-11.

disproportionately impact the lowest income customers. As the Commission previously concluded, a tiered maximum CAP credit threshold “results in more equitable outcomes” and “redirects subsidies to the lowest-income customers that need the most aid.”⁴²

Further, CAUSE-PA questions how Peoples (through its program administrator, DEF) makes the determination that CAP customers are “not using gas responsibly.” (TO at 32). Removal from CAP can have far-ranging impacts on the health, safety, and welfare of a CAP participant. As such, it is essential that the rules surrounding CAP removals are exceedingly clear and subjective, and avoid potential bias in application of the rules. To the extent Peoples is permitted to proceed with removals, which we strongly oppose, CAUSE-PA recommends that Peoples be required to provide additional details about the types of usage which it considers “unjustified.” In turn, Peoples should be required to detail how it trains and monitors DEF to identify and assess “unjustified” usage and to avoid bias in decision making related thereto. Finally, CAUSE-PA recommends that Peoples be required to provide a specific notice to customers subject to removal for how to timely appeal the decision prior to removal from the program. Consistent with the Commission’s Final Policy Statement Order, Peoples should be required to work with its USAG to review and provide feedback for Peoples’ (and DEF’s) customer communications regarding application of the maximum CAP credit threshold, and all applicable exemptions.⁴³

h. CAUSE-PA supports Peoples’ proposal to implement an online CAP application, and recommends that the application be optimized for use with a mobile phone.

CAUSE-PA supports implementation of an online CAP application. While Peoples indicates its expectation that the online application will be implemented in the fourth quarter of

⁴² Final CAP Policy Statement and Order at 60-61.

⁴³ Final CAP Policy Statement and Order at 61.

2020, we are concerned that this deadline may face delays consistent with similar projects across the state. (See Peoples Supplemental Information at 3). Understanding the current challenges and project delays every organization is facing as a result of COVID-19, including utilities, we recommend setting a clear and reasonable deadline for roll-out of the application – with interim updates if needed to ensure proper and timely launch. We recognize the critical importance of this tool and hope to see it deployed in the short term to facilitate enrollment and alleviate what may be a substantial influx of calls to DEF in spring 2021 as the emergency protections from termination expire.

Moreover, Peoples indicated that DEF will deploy the online application on its website. (Peoples Supplemental Information at 3). It is unclear from Peoples’ description whether DEF’s online application will be optimized for use with a mobile phone. CAUSE-PA asserts that any application deployed should be mobile-friendly, and include the ability to scan and upload documents using a mobile device. Low-income households often do not have access to broadband internet service or a computer, but may have access to online applications and features on a mobile device.⁴⁴

Finally, it is unclear from Peoples description of its online application process whether and to what extent applicants will be notified of the process to complete their application via email, fax, or US Mail if they are otherwise unable to upload their documents through the application. (Peoples Supplemental Information at 3). CAUSE-PA recommends that Peoples be required to clarify its process for providing notification to online applicants when an application is considered incomplete. In turn, we recommend that Peoples be required to share relevant data with its USAG

⁴⁴ Pew Research Center, Digital Divide Persists Even as Lower-Income Americans Make Gains in Tech Adoption (May 7, 2019), <https://www.pewresearch.org/fact-tank/2019/05/07/digital-divide-persists-even-as-lower-income-americans-make-gains-in-tech-adoption/>

regarding the number of successful and incomplete online applications to help determine how well the application is functioning and identify possible improvements that could be made both to MyApp and to the application process overall.

i. CAUSE-PA supports Peoples' adoption of the Commission's standardized form for applicants with no income.

CAUSE-PA supports Peoples' adoption of the Commission's standardized zero-income form. We agree with the Commission that adopting this proposed change is consistent with recommendations included in the Commission's CAP Policy Statement, and urge the Commission to approve this proposal without further delay.

j. CAUSE-PA supports adoption of Peoples' amended CAP recertification timeframes.

CAUSE-PA supports Peoples' adoption of the proposed recertification process and timeframes. We agree with the Commission that adopting this proposed change is consistent with recommendations included in the Commission's CAP Policy Statement, and urge the Commission to approve this proposal without further delay.

k. CAUSE-PA supports adoption of Peoples' Consumer Education and Outreach Plan, with modifications to improve its targeted outreach strategies – especially in light of COVID-19 challenges.

CAUSE-PA appreciates and supports the Peoples' Companies consumer education and outreach efforts. We commend Peoples for their continued strong, collaborative stakeholder engagement, trusting and relying on the expertise of the diverse members of its USAG. Consumer education and outreach is of critical importance. Recognizing current realities related to the ongoing COVID-19 public health crisis, with regard to in-person outreach initiatives, we encourage Peoples to include more direct, targeted outreach efforts in their plan.

To that end, CAUSE-PA recommends consistent outbound calling and other such campaigns to reach those who are falling behind in their payments. We acknowledge DEF's

current efforts to conduct these calls as time allows, but we believe this should be a regular course of action. Further, we recommend DEF target specific areas within its service territory with high concentrations of low-income individuals who may benefit from assistance, but may not realize such assistance is available to them. We urge Peoples to utilize GIS mapping technology to determine which neighborhoods would be best served by this type of targeted outreach and education. Overlaying poverty data with existing program enrollment will help to show where there may be critical gaps in services to discreet populations that may be harder to reach and would help alleviate potential disparities in program reach to historically underserved populations. CAUSE-PA believes taking this proactive approach could help reach customers in need, enrolling them in programs before they accrue arrears, improving customer quality of life, and improving utility payment behavior and associated collections costs over the long-term.

1. CAUSE-PA is concerned with the lack of clarity in Peoples' definition of child income, and recommends that Peoples further clarify that earned and unearned income of a child is not counted.

CAUSE-PA is concerned with the continued lack of clarity in Peoples' definition of child income. As clearly stated in Section 69.262 of the CAP Policy Statement, household income is defined as the "combined gross income of all adults in a residential household who benefit from the public utility service, as defined in 66 Pa.C.S. § 1403 (relating to definitions)."⁴⁵

In the Tentative Order, the Commission requested that Peoples explain whether earned and unearned income of minor children are excluded when determining CAP eligibility and benefits. (TO at 35). Peoples responded with a reference to the Addendum to their USECP filed on January 6, 2020. (Peoples Supplemental Information at 3). Peoples' addendum indicates that the definition

⁴⁵ 52 Pa. Code § 69.262; 66 Pa. C.S. § 1403. Section 1403 defines household income as "the combined gross income of all adults in a residential household who benefit from the public utility service." 66 Pa. C.S. § 1403.

of “household income” as defined in Chapter 14 “will be implemented February 1, 2020 for new CAP enrollments and recertifications.” However, Peoples further indicates:

CAP Customers who have enrolled on the basis of LIHEAP or who have certain fixed income types (pension, social security or disability) are recertified once every three years. Other income types will recertify once every two years. Customers reporting no income are required to recertify at least every (6) months. The exception to this requirement are those households whose sole income is **unearned income** for a child. In those cases, recertification, dependent on the type of income received by the child, will follow the recertification schedule provided for that type of income.

This provision plainly indicates that Peoples intends to consider unearned child income in eligibility determinations when the household is otherwise without any adult income. CAUSE-PA asserts the inclusion of any income received by or on behalf of a child – whether earned or unearned - is inappropriate to include as part of household income and contradicts the plain definition in Chapter 14 and the Commission’s CAP Policy Statement. We therefore recommend that Peoples revises their plan to exclude all earned and unearned child income from eligibility requirements, in accordance with the definition of household income included in Chapter 14 and with the Commission’s revised CAP Policy.

m. CAUSE-PA opposes Peoples’ proposed CAP restoration policy for CAP eligible customers, as all CAP eligible customers should be permitted to apply for and enroll in CAP without upfront payment of any kind.

In its Supplemental Information, Peoples explains that CAP eligible customers with fewer than two broken payment arrangements who seek to restore service after an involuntary termination are required to pay 1/24th of the balance for restoration. (Peoples Supplemental Information at 3). Those with more than two broken payment arrangements are required to pay the full balance, unless they can provide documentation proving they are CAP eligible – at which time they will be quoted 1/24th of the balance for restoration. (Id.)

CAUSE-PA is opposed to this policy, as it imposes an unfair and possibly insurmountable burden on low income customers who have clearly demonstrated an inability to pay. Pursuant to

Peoples' restoration policy for CAP eligible households, the difference of a single day in the submission of a CAP application could quite literally mean the difference of several hundred dollars in order to preserve natural gas service to their home. Such a result is contrary to the Commission's statutory obligations to ensure that low income customers are able to access universal service programming in order to maintain natural gas service to their home.⁴⁶ CAP eligible customers should be permitted to restore service by submitting a completed application for CAP – without requiring any upfront payment. Pursuant to Chapter 14, a consumer remains a customer of the utility for 30 days following a termination if they seek reconnection at the same location.⁴⁷ CAUSE-PA submits that *all* eligible customers of Peoples – including those who have been terminated and seek to reconnect – should be provided the option to enroll in CAP without facing any upfront payment.

n. CAUSE-PA supports Peoples' proposal to permit DEF to use of income information on file (with consent) to facilitate cross enrollment, though it recommends adopting further parameters to preserve confidentiality.

CAUSE-PA supports Peoples' proposal to permit DEF to use income information on file to facilitate cross-enrollment and/or recertification for programs administered by DEF. (TO at 36-37). Currently DEF administers a number of assistance programs for utilities which overlap with Peoples service territory, including Duquesne Light, Pittsburgh Water and Sewer Authority, and Pennsylvania American Water. Coordination of enrollment and recertification requirements across these programs would limit the administrative burden on utilities and consumers to submit and review duplicative paperwork and promotes the provision of holistic services to the consumer.

⁴⁶ 66 Pa. C.S. §§ 2202, 2203(8).

⁴⁷ 66 Pa. C.S. § 1402.

That said, and notwithstanding our strong support for this proposal, CAUSE-PA recommends that the Commission require Peoples to clarify its use of the phrase “used for appropriate means.” (Peoples Supplemental Information at 3). Information on file with DEF should only ever be used for the purpose of cross-enrollment in available assistance programs for the benefit of the customer. Thus, DEF should be expressly limited in its ability to request consent from a customer to use their information in any other manner.

- o. CAUSE-PA supports Peoples’ policy of delaying termination when warranted in extraordinary circumstances.*

CAUSE-PA supports Peoples’ reservation of the right to delay termination of service based on individual, extraordinary circumstances. We commend Peoples for its recognition that there are circumstances where termination of service is not in the public interest, and will only serve to exacerbate a unique hardship for the CAP customer. Peoples’ decision to allow its Customer Relations team members (Director and certified social workers) the ability to intervene to halt termination to help address extraordinary circumstances is to the benefit of all parties, customer and utility alike. (Peoples Supplemental Information at 4).

- p. CAUSE-PA recommends that Peoples utilize its CARES program to ensure that customers with unique needs are able to apply for CAP through alternative means.*

CAUSE-PA shares the Commission’s concern that elimination of the option to apply for CAP on paper may impact uniquely vulnerable customers, including Seniors, individuals with a disability, and those who lack access to stable telecommunication or broadband services - many of whom may rely on in-person contact to complete necessary documentation. (TO at 38-39). With the challenges presented by the COVID-19 public health crisis, customers who may have applied in person, in most cases, cannot do so now or for the foreseeable future. However, this reality does not assuage our concern that many of the most vulnerable consumers may be unable

to apply for assistance over the phone or online. If anything, it exacerbates our concern that these uniquely vulnerable consumers may be further isolated from receiving critical assistance and necessary supports. We therefore recommend that DEF coordinate with those working in Peoples' CARES program to ensure that all customers can have the assistance they require when applying for CAP.

q. CAUSE-PA opposes Peoples' CAP final billing policy, as it imposes categorically unaffordable rates on CAP customers.

In its Supplemental Information, Peoples explained that it issues final bills for former CAP customers at the full, undiscounted residential usage rate. (Peoples Supplemental Information at 5). Peoples argues that final billing CAP customers at the full residential rate is more beneficial because (1) most final bills are for a partial month, at an average of 10 days; and (2) three-quarters occur during non-heating months, when CAP bills often exceed residential usage. (Id.) But the flip side of these figures is that many CAP final bill customers are final billed for more than 10 days, and one in four former CAP customers receives a final bill during the heating months – when the full residential bill may be *substantially* higher than the applicable CAP rate.

CAUSE-PA recommends that Peoples be required to prorate its final CAP bill to the number of days the customer received service in the final month. Such a policy would be far more equitable, and would ensure that CAP customers continue to receive an affordable, CAP rate bill for the entire duration of their CAP enrollment – even upon final billing. Indeed, if a CAP customer voluntarily requests to end service or is involuntarily terminated, and is later final billed for the partial billing period, they must be charged a CAP rate for the days they were enrolled in CAP. This is not unlike how other residential or commercial rate customers are

treated: Upon final billing, they are charged the rates that are applicable on the day the services were used. This is what the Public Utility Code demands.⁴⁸

In the alternative, CAUSE-PA recommends that Peoples be required to conduct a comparison between the applicable residential rate and the CAP rate, and compute the final bill for the lesser of the two rates. This alternative recommendation is consistent with the Commission’s CAP Final Bill Order, which explained that public utilities have an obligation “to compute bills under the rate most beneficial to the customer.”⁴⁹

2. LOW INCOME USAGE REDUCTION PROGRAM (LIURP)

a. Non-Savers Survey

CAUSE-PA supports the method by which Peoples manages and reports on those who have difficulty saving energy after LIURP services are provided.

b. Health and Safety Measures

CAUSE-PA supports Peoples’ provision of additional funding for health and safety measures to improve access to usage reduction and energy efficiency services through LIURP, though we question whether Peoples’ allowance for health and safety measures is adequate to ensure that LIURP is able to serve those with the highest usage and the greatest need. In many cases, high-usage households are unable to access LIURP services as existing health and safety issues disqualify them from participation. For example, if a home has unhealthy levels of moisture, mold, or mildew present (each a trigger for acute environmental health problems, exacerbated by

⁴⁸ 66 Pa. C.S. § 1303.

⁴⁹ Staff Review of Customer Assistance Program (CAP) Final Billing Methods, Final Order, Docket No. M-2019-3010190, at page 22 (filed March 12, 2020).

the COVID-19 crisis⁵⁰), that household is excluded from LIURP participation unless or until the health and safety issues are corrected. But these same households often have the greatest need for usage reduction and weatherization services, as they often face high energy costs and poor health outcomes as a result of poorly maintained and energy inefficient housing – and yet are unable to access LIURP services without this coordinated funding.

Homes that cannot be weatherized because of health and safety concerns are dangerous to live in and dangerous to communities. When a household’s primary heating system is inadequate or inoperable, members of the household will often resort to using unsafe, high-usage, and high-cost alternative heating methods including solutions such as electric space-heaters, electric stoves, and/or portable generators, which increase the risk of carbon monoxide (CO) poisoning and house fires.⁵¹ This places all members of the household and members of the greater community at risk of serious harm. For this reason, when dangerous issues are present in a home, it is to everyone’s benefit that such matters are addressed in a timely fashion to prevent further damage or worsening conditions in the home.

Peoples noted in their supporting documentation that typical health and safety items needing to be addressed include: CO Detectors, confined space corrections, dryer venting issues, knob & tube mitigation, roof leaks, gas leaks and water leaks. (Peoples Supplemental Information at 5). The average cost to mitigate health and safety issues was a little more than \$400. (Id.) Further, contractors may implement health and safety measures up to \$600 without prior authorization, and

⁵⁰ See Nat’l League of Cities, Housing, Hazards and Health: Considerations and Approaches in Light of COVID-19 (Aug. 11, 2020), <https://www.nlc.org/article/2020/08/11/housing-hazards-and-health-considerations-and-approaches%E2%80%AFin-light-of-covid-19%E2%80%AF/>.

⁵¹ See Nat’l Fire Protection Ass’n, Fire Analysis & Research Division, Home Fires Involving Heating Equipment, at 1 (Dec. 2018) (finding that space heaters cause 44% of all home heating related fires, and 86% of deaths caused by home heating related fires).

projects requiring funding beyond \$600 are determined by the LIURP administrator on a case-by-case basis. (Id.)

The extent to which Peoples or its contractors approve additional health and safety remediation, and the parameters for which those decisions are made, remains unclear. For example, Peoples does not indicate whether the assessment is made based on the ability to achieve cost-effective savings in the home or if some other standard may apply. It is also unclear how many homes receive an initial home visit, but are later denied or deferred for LIURP services due to health and safety concerns in the home that are not able to be remediated within the allowed budget.

CAUSE-PA supports Peoples' policy of allowing LIURP contractors to make determinations in the field to conduct additional health and safety remediation as needed to complete the LIURP work (currently up to \$600) - without having to adhere to an exclusive list of measures that may be deemed appropriate. We believe this allows for necessary flexibility to address unique situations that arise in the field, and will help to improve the cost-effectiveness of the program by reducing the need for LIURP deferrals.

That said, CAUSE-PA recommends that contractors be instructed to complete *all* health and safety remediations necessary to achieve cost-effective savings potential in the home. In turn, we believe this initial contractor spending threshold should be increased to \$1,000 – with flexibility for approval from Peoples to conduct health and safety remediation up to \$2,000 per job in cases where cost effective savings can still be achieved.

An evaluation conducted for Columbia Gas' proposed USECP for 2019-2023 concluded that, depending on the characteristics of the job, Columbia may spend significant capital remediating health and safety issues but still achieve savings, given the capacity for savings that

exist within the homes that are most in need of remediation.⁵² There is every reason to believe the same analysis is applicable to other natural gas utilities' LIURP services, including Peoples.

c. EFSLR Program Measures Available to Renters

CAUSE-PA supports Peoples' proposal to allow renters to access relief through its Emergency Furnace and Service Line Repair Program (EFSLR). This proposal was part of the Commission-approved Settlement in Aqua's acquisition of Peoples, and should be approved without modification.⁵³

d. Aqua Acquisition & LIURP Funding

CAUSE-PA supports Peoples' proposal to maintain its LIURP funding at levels which are – *at a minimum* – consistent with the funding levels proposed in its proposed USECP, as well as a number of other provisions related to Peoples' LIURP and Hardship Fund program funding. These provisions were part of the Commission-approved Settlement in Aqua's acquisition of Peoples, and should be approved without modification.⁵⁴

3. CARES

CAUSE-PA has no specific comments regarding Peoples' current CARES program, though we underscore our earlier recommendation that Peoples utilize its CARES team to assist

⁵²Columbia Gas of Pennsylvania, Inc. Universal Service and Energy Conservation Plan 2019-2021, Docket No. M-2018-2645401, at 5.

⁵³ Joint Application of Aqua America Inc., Aqua Pennsylvania Inc., Aqua Pennsylvania Wastewater Inc., and Peoples Natural Gas Company LLC for All of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America Inc., Opinion and Order, Docket No. A-2018-3006061 (filed January 24, 2020).

⁵⁴ Joint Application of Aqua America Inc., Aqua Pennsylvania Inc., Aqua Pennsylvania Wastewater Inc., and Peoples Natural Gas Company LLC for All of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America Inc., Opinion and Order, Docket No. A-2018-3006061 (filed January 24, 2020).

uniquely vulnerable households who may need additional assistance to complete the CAP application process through alternative means.

4. HARDSHIP FUND PROGRAM

CAUSE-PA shares the Commission's concerns regarding DEF's introduction of requirements on their website that fall outside those requirements listed in Peoples proposed USECP. We are concerned that DEF, rather than Peoples, is directing Peoples' program requirements. Peoples explanation in its supplemental information noting that certain requirements are included in a contract with DEF and that eligibility requirements are subject to change throughout the year does little to alleviate these concerns. (Peoples Supplemental Information at Attachment G). In fact, it amplifies concerns. Program eligibility and benefits should not be subject to contract negotiations with DEF – or on the particular “philosophy” of a program administrator for who is most deserving of program benefits. (Peoples Supplemental Information at Attachment G). A utilities' universal service program eligibility criteria must be made explicit in each utilities' Commission-approved USECP – and should not be allowed to operate as a shadow set of rules subject to the philosophies of a program administrator.

CAUSE-PA has specific concerns regarding with regard to DEF's “sincere effort of payment.” (*Id.*) Requiring customers to pay a specific dollar amount in order to access grant assistance to help resolve an acute financial hardship is counterintuitive, and is likely to drive economically vulnerable consumers to borrow money from predatory lenders and resort to other high cost financing options – further exacerbating their payment trouble.⁵⁵ Importantly, this good

⁵⁵ Center for American Progress, How Predatory Debt Traps Threaten Vulnerable Families, (October 6, 2016), <https://www.americanprogress.org/issues/economy/reports/2016/10/06/145629/how-predatory-debt-traps-threaten-vulnerable-families/>; see also Ariel Dreihobl & Lauren Ross, Lifting the High Energy Burden in America's Largest Cities (April 2016), <https://www.aceee.org/sites/default/files/publications/researchreports/u1602.pdf>

faith payment requirement favors low income individuals with family members they can turn to for emergency assistance – leaving out historically marginalized communities faced with generational poverty and little place to turn for assistance.

Further, while CAP customers can apply for hardship grants, it does not appear there is any leniency in the amount of the payment required – which may well exceed the household’s monthly CAP payment. If a CAP customer is making their payments every month in accordance with the CAP program, and it is lower than the sincere effort of payment required for a hardship grant, they will never qualify for this grant even if they find themselves in dire need of the assistance and at risk of imminent termination.

While time in this proceeding has not permitted a more searching inquiry of this issue, and the extent to which DEF may be imposing additional rules outside of those reviewed and approved by the Commission, CAUSE-PA submits that the materials available for review are troubling – and suggest that, in addition to the Commission-approved USECP, there is also a shadow set of rules which may shift without warning and which are driven by the philosophy of the administrator instead of the sound public policy determinations of the Commission. Consistent with the Commission’s statutory duty to oversee Peoples’ universal service programming, CAUSE-PA recommends that the Commission prohibit DEF – and other program administrators – from imposing rules which are not memorialized in Peoples USECP.

The troubling reality is that many households resort to high-cost payday lending in order to pay their utility bills, which can further exacerbate the cycle of poverty. A 2012 study found that paying utility bills was the most common reason why individuals took out a payday loan. These loans are small, short-term loans with high interest rates that can make repayment difficult and costly. By addressing energy affordability, policymakers can help to break the cycle of poverty and increase economic development, educational achievement, and public health.

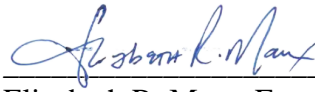
Id. at 13.

IV. CONCLUSION

CAUSE-PA thanks the Commission for its thoughtful consideration of the issues raised above. We urge the Commission to act accordingly to ensure that all customers – regardless of income – are able to access safe, affordable natural gas service within the Peoples service territory.

Respectfully Submitted,

PENNSYLVANIA UTILITY LAW PROJECT



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October 20, 2020

APPENDIX A

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

Interrogatories of the Office of Consumer Advocate
Set I

2. Please provide for the months October 2018 to present, the percentage of CAP bills (in dollars) paid by CAP participants by Federal Poverty Level.

Company Response:

Submitted by: Rita Black, Director of Customer Relations

Dated: October 6, 2020

Please refer to the attached Excel document (Attachment_OCA_I_2_3) which contains the requested data for this request as well as OCA Set I, Question 3. Please note the following pertaining to the data:

EGCP – Refers to the former Equitable Gas Division

PNGC – Refers to the former Peoples Gas Division

PTWP – Refers to Peoples Gas LLC

The number of invoices refers to the number of bills issued.

The poverty levels are defined as follows:

Group A	0 to 50% FPL
Group B	51 to 100% FPL
Group C	101 to 150% FPL
Group D	151 to 200% FPL

Please note, if a customer is in arrears and did not pay the full amount due, they are not counted as paid for the purposes of this exercise. To be paid in full, all outstanding charges must be paid. As a result, customers who are often behind due to paying partial payments or paying after the due date are not reflected in the attached.

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

**Interrogatories of the Office of Consumer Advocate
Set I**

3. Please provide for the months October 2018 to present, the percentage of CAP bills (in number of accounts) paid in-full by CAP participants by Federal Poverty Level.

Company Response:

Submitted by: Rita Black, Director of Customer Relations

Dated: October 6, 2020

Please see the Response to OCA Set I Question 2.

Company	Inv Month	CAP Level	CAP Invoices	Invs Paid in Full	% of Invoices Paid	CAP Billed \$	\$ Paid in Full	% of Dollars Paid
EGCP	201810	A	3,783	1,462	38.65%	\$ 190,614.09	\$ 74,547.09	39.11%
EGCP	201811	A	3,198	1,219	38.12%	\$ 167,244.14	\$ 61,422.05	36.73%
EGCP	201812	A	3,308	1,297	39.21%	\$ 171,884.09	\$ 63,704.96	37.06%
EGCP	201901	A	3,994	1,542	38.61%	\$ 206,663.44	\$ 75,209.00	36.39%
EGCP	201902	A	3,403	1,502	44.14%	\$ 178,281.76	\$ 74,799.84	41.96%
EGCP	201903	A	3,558	1,642	46.15%	\$ 185,675.66	\$ 82,338.76	44.35%
EGCP	201904	A	3,622	1,736	47.93%	\$ 189,848.43	\$ 87,161.49	45.91%
EGCP	201905	A	3,712	1,732	46.66%	\$ 188,026.18	\$ 83,794.29	44.57%
EGCP	201906	A	3,621	1,663	45.93%	\$ 175,637.80	\$ 77,809.31	44.30%
EGCP	201907	A	3,669	1,512	41.21%	\$ 176,651.50	\$ 72,475.51	41.03%
EGCP	201908	A	3,582	1,417	39.56%	\$ 169,291.37	\$ 67,412.10	39.82%
EGCP	201909	A	3,208	1,256	39.15%	\$ 154,945.34	\$ 61,464.84	39.67%
EGCP	201910	A	3,714	1,570	42.27%	\$ 182,213.77	\$ 77,462.79	42.51%
EGCP	201911	A	2,883	1,210	41.97%	\$ 149,547.32	\$ 59,146.82	39.55%
EGCP	201912	A	3,349	1,386	41.39%	\$ 177,751.30	\$ 68,932.40	38.78%
EGCP	202001	A	3,551	1,428	40.21%	\$ 187,388.48	\$ 69,807.84	37.25%
EGCP	202002	A	3,122	1,405	45.00%	\$ 165,194.86	\$ 69,517.45	42.08%
EGCP	202003	A	3,473	1,517	43.68%	\$ 178,832.51	\$ 73,210.44	40.94%
EGCP	202004	A	3,252	1,538	47.29%	\$ 166,716.90	\$ 74,989.44	44.98%
EGCP	202005	A	3,222	1,516	47.05%	\$ 162,297.97	\$ 73,068.76	45.02%
EGCP	202006	A	3,821	1,797	47.03%	\$ 187,099.31	\$ 84,142.66	44.97%
EGCP	202007	A	3,773	1,709	45.30%	\$ 185,288.47	\$ 81,870.98	44.19%
EGCP	202008	A	3,717	1,645	44.26%	\$ 181,023.93	\$ 77,234.33	42.67%
EGCP	201810	B	6,343	2,892	45.59%	\$ 479,507.07	\$ 223,214.04	46.55%
EGCP	201811	B	5,296	2,430	45.88%	\$ 423,098.84	\$ 185,699.69	43.89%
EGCP	201812	B	5,419	2,549	47.04%	\$ 435,098.12	\$ 193,386.41	44.45%
EGCP	201901	B	6,819	3,032	44.46%	\$ 546,641.10	\$ 230,699.92	42.20%
EGCP	201902	B	5,692	2,753	48.37%	\$ 462,214.42	\$ 213,791.80	46.25%
EGCP	201903	B	5,874	2,875	48.94%	\$ 479,545.07	\$ 224,004.78	46.71%
EGCP	201904	B	6,037	2,993	49.58%	\$ 490,263.72	\$ 232,979.55	47.52%
EGCP	201905	B	6,236	3,014	48.33%	\$ 474,478.41	\$ 230,681.69	48.62%
EGCP	201906	B	5,959	2,974	49.91%	\$ 432,406.66	\$ 214,849.07	49.69%
EGCP	201907	B	6,015	2,767	46.00%	\$ 440,423.91	\$ 207,801.57	47.18%
EGCP	201908	B	5,839	2,634	45.11%	\$ 415,121.05	\$ 191,749.57	46.19%
EGCP	201909	B	5,266	2,412	45.80%	\$ 375,840.51	\$ 175,513.34	46.70%
EGCP	201910	B	6,108	2,938	48.10%	\$ 441,359.97	\$ 213,785.23	48.44%
EGCP	201911	B	4,718	2,352	49.85%	\$ 358,885.67	\$ 172,711.29	48.12%
EGCP	201912	B	5,420	2,561	47.25%	\$ 429,799.68	\$ 192,276.98	44.74%
EGCP	202001	B	5,726	2,596	45.34%	\$ 454,342.77	\$ 196,163.85	43.18%
EGCP	202002	B	5,028	2,453	48.79%	\$ 391,501.09	\$ 184,874.30	47.22%
EGCP	202003	B	5,654	2,622	46.37%	\$ 435,959.89	\$ 195,870.28	44.93%
EGCP	202004	B	5,258	2,708	51.50%	\$ 398,456.28	\$ 200,319.94	50.27%
EGCP	202005	B	5,000	2,598	51.96%	\$ 374,739.06	\$ 190,119.09	50.73%
EGCP	202006	B	5,729	2,903	50.67%	\$ 426,699.80	\$ 213,222.29	49.97%
EGCP	202007	B	5,660	2,779	49.10%	\$ 417,868.99	\$ 202,759.78	48.52%
EGCP	202008	B	5,437	2,642	48.59%	\$ 401,153.76	\$ 192,880.29	48.08%
EGCP	201810	C	3,577	1,546	43.22%	\$ 310,063.39	\$ 139,418.20	44.96%
EGCP	201811	C	2,970	1,298	43.70%	\$ 273,528.08	\$ 116,681.14	42.66%

EGCP	201812	C	3,080	1,350	43.83%	\$ 286,692.08	\$ 120,347.31	41.98%
EGCP	201901	C	3,898	1,641	42.10%	\$ 364,800.21	\$ 147,924.38	40.55%
EGCP	201902	C	3,265	1,524	46.68%	\$ 309,407.19	\$ 140,652.92	45.46%
EGCP	201903	C	3,436	1,662	48.37%	\$ 326,692.79	\$ 153,210.36	46.90%
EGCP	201904	C	3,542	1,732	48.90%	\$ 335,956.45	\$ 161,107.77	47.95%
EGCP	201905	C	3,724	1,847	49.60%	\$ 324,633.86	\$ 165,585.71	51.01%
EGCP	201906	C	3,538	1,807	51.07%	\$ 294,135.52	\$ 152,137.53	51.72%
EGCP	201907	C	3,618	1,691	46.74%	\$ 303,263.67	\$ 148,664.09	49.02%
EGCP	201908	C	3,534	1,617	45.76%	\$ 279,451.42	\$ 134,317.07	48.06%
EGCP	201909	C	3,178	1,471	46.29%	\$ 252,085.05	\$ 121,489.52	48.19%
EGCP	201910	C	3,651	1,718	47.06%	\$ 292,499.00	\$ 142,549.16	48.73%
EGCP	201911	C	2,859	1,359	47.53%	\$ 242,077.05	\$ 113,851.41	47.03%
EGCP	201912	C	3,265	1,512	46.31%	\$ 297,882.59	\$ 134,959.08	45.31%
EGCP	202001	C	3,459	1,501	43.39%	\$ 315,448.39	\$ 132,341.72	41.95%
EGCP	202002	C	3,034	1,498	49.37%	\$ 267,120.47	\$ 128,450.87	48.09%
EGCP	202003	C	3,386	1,577	46.57%	\$ 293,223.00	\$ 133,554.11	45.55%
EGCP	202004	C	3,140	1,615	51.43%	\$ 264,838.34	\$ 132,818.89	50.15%
EGCP	202005	C	3,002	1,537	51.20%	\$ 249,321.19	\$ 125,135.04	50.19%
EGCP	202006	C	3,463	1,746	50.42%	\$ 286,549.33	\$ 144,644.84	50.48%
EGCP	202007	C	3,431	1,685	49.11%	\$ 281,334.06	\$ 137,980.17	49.04%
EGCP	202008	C	3,290	1,634	49.67%	\$ 271,026.87	\$ 133,323.46	49.19%
EGCP	201810	D	773	201	26.00%	\$ 70,640.87	\$ 20,322.24	28.77%
EGCP	201811	D	658	165	25.08%	\$ 65,485.80	\$ 17,225.20	26.30%
EGCP	201812	D	714	189	26.47%	\$ 71,587.34	\$ 18,648.96	26.05%
EGCP	201901	D	879	212	24.12%	\$ 89,236.80	\$ 21,621.96	24.23%
EGCP	201902	D	738	202	27.37%	\$ 74,507.92	\$ 20,547.00	27.58%
EGCP	201903	D	784	237	30.23%	\$ 80,317.09	\$ 24,469.61	30.47%
EGCP	201904	D	833	273	32.77%	\$ 84,477.41	\$ 28,565.64	33.81%
EGCP	201905	D	890	289	32.47%	\$ 80,324.21	\$ 28,003.55	34.86%
EGCP	201906	D	855	339	39.65%	\$ 73,480.22	\$ 29,642.28	40.34%
EGCP	201907	D	858	260	30.30%	\$ 75,034.25	\$ 24,184.00	32.23%
EGCP	201908	D	869	265	30.49%	\$ 71,029.06	\$ 23,914.07	33.67%
EGCP	201909	D	778	242	31.11%	\$ 63,123.41	\$ 21,820.23	34.57%
EGCP	201910	D	924	301	32.58%	\$ 77,261.45	\$ 26,856.46	34.76%
EGCP	201911	D	689	205	29.75%	\$ 63,405.29	\$ 19,041.07	30.03%
EGCP	201912	D	807	227	28.13%	\$ 80,751.45	\$ 23,347.00	28.91%
EGCP	202001	D	852	222	26.06%	\$ 85,492.51	\$ 22,645.50	26.49%
EGCP	202002	D	731	219	29.96%	\$ 70,456.39	\$ 20,501.00	29.10%
EGCP	202003	D	835	253	30.30%	\$ 78,175.95	\$ 23,968.53	30.66%
EGCP	202004	D	754	272	36.07%	\$ 69,487.99	\$ 24,760.89	35.63%
EGCP	202005	D	721	257	35.64%	\$ 65,424.75	\$ 23,543.00	35.98%
EGCP	202006	D	870	310	35.63%	\$ 77,204.72	\$ 28,617.57	37.07%
EGCP	202007	D	839	267	31.82%	\$ 73,431.51	\$ 23,958.96	32.63%
EGCP	202008	D	830	288	34.70%	\$ 72,348.13	\$ 25,563.32	35.33%
PNGC	201810	A	4,188	1,740	41.55%	\$ 219,739.12	\$ 91,906.36	41.83%
PNGC	201811	A	3,195	1,444	45.20%	\$ 170,495.04	\$ 74,075.16	43.45%
PNGC	201812	A	3,413	1,500	43.95%	\$ 177,643.19	\$ 74,186.44	41.76%
PNGC	201901	A	4,408	1,894	42.97%	\$ 227,810.24	\$ 92,316.73	40.52%
PNGC	201902	A	3,506	1,774	50.60%	\$ 183,958.10	\$ 88,954.92	48.36%
PNGC	201903	A	3,772	1,890	50.11%	\$ 198,516.67	\$ 96,198.00	48.46%

PNGC	201904	A	3,878	1,926	49.66%	\$ 203,825.01	\$ 96,720.06	47.45%
PNGC	201905	A	4,152	2,034	48.99%	\$ 209,865.95	\$ 100,137.59	47.72%
PNGC	201906	A	3,815	1,849	48.47%	\$ 185,379.67	\$ 87,739.61	47.33%
PNGC	201907	A	4,083	1,814	44.43%	\$ 197,745.92	\$ 87,067.08	44.03%
PNGC	201908	A	4,139	1,757	42.45%	\$ 198,152.26	\$ 84,272.64	42.53%
PNGC	201909	A	3,304	1,444	43.70%	\$ 160,319.23	\$ 70,654.04	44.07%
PNGC	201910	A	4,187	1,907	45.55%	\$ 205,511.93	\$ 92,946.74	45.23%
PNGC	201911	A	3,028	1,436	47.42%	\$ 155,937.73	\$ 71,101.67	45.60%
PNGC	201912	A	3,614	1,631	45.13%	\$ 192,263.84	\$ 82,346.09	42.83%
PNGC	202001	A	3,876	1,711	44.14%	\$ 204,779.18	\$ 85,579.64	41.79%
PNGC	202002	A	3,270	1,628	49.79%	\$ 171,900.21	\$ 81,598.44	47.47%
PNGC	202003	A	3,833	1,720	44.87%	\$ 197,908.58	\$ 84,867.78	42.88%
PNGC	202004	A	3,584	1,836	51.23%	\$ 184,541.46	\$ 91,148.99	49.39%
PNGC	202005	A	3,320	1,705	51.36%	\$ 166,836.14	\$ 83,456.73	50.02%
PNGC	202006	A	4,174	2,083	49.90%	\$ 205,870.21	\$ 100,213.78	48.68%
PNGC	202007	A	4,113	2,012	48.92%	\$ 203,891.40	\$ 96,742.39	47.45%
PNGC	202008	A	3,993	1,833	45.91%	\$ 197,596.82	\$ 88,213.70	44.64%
PNGC	201810	B	8,649	4,255	49.20%	\$ 666,273.71	\$ 331,664.08	49.78%
PNGC	201811	B	6,659	3,394	50.97%	\$ 530,278.89	\$ 259,397.68	48.92%
PNGC	201812	B	6,771	3,443	50.85%	\$ 543,546.53	\$ 260,323.79	47.89%
PNGC	201901	B	8,898	4,304	48.37%	\$ 711,146.27	\$ 325,136.67	45.72%
PNGC	201902	B	7,298	3,903	53.48%	\$ 596,479.35	\$ 305,662.23	51.24%
PNGC	201903	B	7,759	4,027	51.90%	\$ 645,523.91	\$ 319,604.11	49.51%
PNGC	201904	B	7,882	4,060	51.51%	\$ 649,380.52	\$ 322,362.68	49.64%
PNGC	201905	B	8,532	4,348	50.96%	\$ 651,784.98	\$ 331,437.26	50.85%
PNGC	201906	B	7,540	3,974	52.71%	\$ 556,179.84	\$ 291,322.20	52.38%
PNGC	201907	B	8,053	3,943	48.96%	\$ 590,215.93	\$ 296,423.76	50.22%
PNGC	201908	B	8,296	3,928	47.35%	\$ 592,459.74	\$ 287,694.04	48.56%
PNGC	201909	B	6,676	3,280	49.13%	\$ 475,327.03	\$ 238,846.99	50.25%
PNGC	201910	B	8,248	4,240	51.41%	\$ 600,284.72	\$ 309,557.75	51.57%
PNGC	201911	B	5,959	3,199	53.68%	\$ 449,286.17	\$ 233,536.83	51.98%
PNGC	201912	B	7,100	3,702	52.14%	\$ 562,427.00	\$ 279,620.39	49.72%
PNGC	202001	B	7,507	3,753	49.99%	\$ 596,972.52	\$ 282,597.15	47.34%
PNGC	202002	B	6,502	3,389	52.12%	\$ 506,388.29	\$ 252,985.05	49.96%
PNGC	202003	B	7,487	3,684	49.21%	\$ 575,614.80	\$ 270,433.78	46.98%
PNGC	202004	B	7,007	3,821	54.53%	\$ 533,664.45	\$ 282,289.03	52.90%
PNGC	202005	B	6,204	3,445	55.53%	\$ 461,082.85	\$ 249,405.77	54.09%
PNGC	202006	B	7,496	3,988	53.20%	\$ 557,843.84	\$ 289,790.20	51.95%
PNGC	202007	B	7,463	3,913	52.43%	\$ 552,980.78	\$ 282,339.75	51.06%
PNGC	202008	B	6,998	3,628	51.84%	\$ 519,149.64	\$ 262,555.91	50.57%
PNGC	201810	C	6,034	3,058	50.68%	\$ 534,228.74	\$ 275,663.18	51.60%
PNGC	201811	C	4,905	2,529	51.56%	\$ 445,372.43	\$ 223,744.64	50.24%
PNGC	201812	C	4,908	2,505	51.04%	\$ 449,794.67	\$ 219,914.06	48.89%
PNGC	201901	C	6,231	3,101	49.77%	\$ 572,745.26	\$ 273,606.67	47.77%
PNGC	201902	C	5,236	2,894	55.27%	\$ 492,107.85	\$ 262,881.75	53.42%
PNGC	201903	C	5,600	3,016	53.86%	\$ 532,213.88	\$ 276,114.68	51.88%
PNGC	201904	C	5,614	3,027	53.92%	\$ 533,379.45	\$ 280,707.82	52.63%
PNGC	201905	C	6,028	3,249	53.90%	\$ 527,908.40	\$ 288,010.28	54.56%
PNGC	201906	C	5,411	2,953	54.57%	\$ 453,052.91	\$ 249,324.89	55.03%
PNGC	201907	C	5,727	2,940	51.34%	\$ 476,480.55	\$ 253,328.31	53.17%

PNGC	201908	C	5,868	2,929	49.91%	\$ 463,543.53	\$ 240,813.15	51.95%
PNGC	201909	C	4,810	2,441	50.75%	\$ 378,219.93	\$ 200,244.87	52.94%
PNGC	201910	C	5,816	3,060	52.61%	\$ 466,280.07	\$ 251,865.34	54.02%
PNGC	201911	C	4,289	2,281	53.18%	\$ 358,132.30	\$ 187,976.56	52.49%
PNGC	201912	C	5,100	2,660	52.16%	\$ 458,662.47	\$ 232,179.96	50.62%
PNGC	202001	C	5,374	2,671	49.70%	\$ 484,989.27	\$ 234,169.10	48.28%
PNGC	202002	C	4,687	2,495	53.23%	\$ 410,575.29	\$ 212,170.17	51.68%
PNGC	202003	C	5,325	2,727	51.21%	\$ 455,497.65	\$ 227,370.93	49.92%
PNGC	202004	C	4,927	2,819	57.22%	\$ 414,218.92	\$ 232,572.54	56.15%
PNGC	202005	C	4,436	2,555	57.60%	\$ 364,398.22	\$ 206,465.37	56.66%
PNGC	202006	C	5,309	2,993	56.38%	\$ 435,409.84	\$ 242,119.74	55.61%
PNGC	202007	C	5,271	2,834	53.77%	\$ 431,211.04	\$ 227,758.17	52.82%
PNGC	202008	C	5,015	2,695	53.74%	\$ 408,176.44	\$ 215,687.43	52.84%
PNGC	201810	D	1,302	365	28.03%	\$ 122,292.97	\$ 38,922.14	31.83%
PNGC	201811	D	1,055	306	29.00%	\$ 105,750.16	\$ 32,062.77	30.32%
PNGC	201812	D	1,113	299	26.86%	\$ 114,816.67	\$ 30,856.00	26.87%
PNGC	201901	D	1,437	372	25.89%	\$ 148,747.41	\$ 38,755.00	26.05%
PNGC	201902	D	1,139	343	30.11%	\$ 120,514.91	\$ 37,114.00	30.80%
PNGC	201903	D	1,261	376	29.82%	\$ 135,215.88	\$ 40,167.00	29.71%
PNGC	201904	D	1,278	418	32.71%	\$ 136,384.06	\$ 45,391.99	33.28%
PNGC	201905	D	1,437	519	36.12%	\$ 133,000.67	\$ 51,582.15	38.78%
PNGC	201906	D	1,288	487	37.81%	\$ 113,504.69	\$ 45,021.55	39.66%
PNGC	201907	D	1,363	458	33.60%	\$ 119,311.46	\$ 45,006.86	37.72%
PNGC	201908	D	1,452	493	33.95%	\$ 118,247.03	\$ 44,782.20	37.87%
PNGC	201909	D	1,174	405	34.50%	\$ 95,158.38	\$ 36,027.11	37.86%
PNGC	201910	D	1,437	446	31.04%	\$ 120,445.21	\$ 41,074.00	34.10%
PNGC	201911	D	1,050	327	31.14%	\$ 95,402.18	\$ 30,220.74	31.68%
PNGC	201912	D	1,243	394	31.70%	\$ 123,541.58	\$ 40,005.35	32.38%
PNGC	202001	D	1,307	384	29.38%	\$ 129,716.41	\$ 38,702.50	29.84%
PNGC	202002	D	1,109	384	34.63%	\$ 106,019.00	\$ 37,660.00	35.52%
PNGC	202003	D	1,294	445	34.39%	\$ 118,981.99	\$ 41,494.01	34.87%
PNGC	202004	D	1,174	468	39.86%	\$ 105,827.77	\$ 42,255.66	39.93%
PNGC	202005	D	1,044	405	38.79%	\$ 90,988.37	\$ 35,839.06	39.39%
PNGC	202006	D	1,302	523	40.17%	\$ 111,906.38	\$ 45,892.29	41.01%
PNGC	202007	D	1,278	508	39.75%	\$ 109,051.57	\$ 43,639.13	40.02%
PNGC	202008	D	1,224	457	37.34%	\$ 104,473.84	\$ 39,590.82	37.90%
PTWP	201810	A	571	287	50.26%	\$ 33,337.26	\$ 16,829.14	50.48%
PTWP	201811	A	525	270	51.43%	\$ 31,034.01	\$ 15,196.00	48.97%
PTWP	201812	A	526	283	53.80%	\$ 30,828.62	\$ 15,732.00	51.03%
PTWP	201901	A	586	312	53.24%	\$ 34,463.99	\$ 17,697.00	51.35%
PTWP	201902	A	551	315	57.17%	\$ 32,925.58	\$ 17,557.00	53.32%
PTWP	201903	A	559	301	53.85%	\$ 33,299.28	\$ 16,617.00	49.90%
PTWP	201904	A	566	319	56.36%	\$ 33,457.32	\$ 17,527.35	52.39%
PTWP	201905	A	588	311	52.89%	\$ 33,177.90	\$ 17,186.70	51.80%
PTWP	201906	A	568	304	53.52%	\$ 30,964.93	\$ 16,006.92	51.69%
PTWP	201907	A	542	279	51.48%	\$ 29,752.06	\$ 15,114.03	50.80%
PTWP	201908	A	507	253	49.90%	\$ 28,750.98	\$ 13,898.91	48.34%
PTWP	201909	A	474	242	51.05%	\$ 27,432.46	\$ 13,911.63	50.71%
PTWP	201910	A	568	311	54.75%	\$ 33,235.97	\$ 18,059.57	54.34%
PTWP	201911	A	389	206	52.96%	\$ 22,972.14	\$ 11,256.00	49.00%

PTWP	201912	A	496	267	53.83%	\$ 29,915.56	\$ 15,258.55	51.01%
PTWP	202001	A	478	249	52.09%	\$ 28,903.55	\$ 14,291.00	49.44%
PTWP	202002	A	474	268	56.54%	\$ 28,325.60	\$ 15,160.60	53.52%
PTWP	202003	A	504	266	52.78%	\$ 30,431.10	\$ 15,037.00	49.41%
PTWP	202004	A	483	291	60.25%	\$ 28,234.91	\$ 16,376.00	58.00%
PTWP	202005	A	504	281	55.75%	\$ 28,623.35	\$ 15,280.20	53.38%
PTWP	202006	A	536	302	56.34%	\$ 29,993.16	\$ 16,552.34	55.19%
PTWP	202007	A	544	282	51.84%	\$ 30,513.98	\$ 15,505.00	50.81%
PTWP	202008	A	541	274	50.65%	\$ 30,389.45	\$ 14,682.00	48.31%
PTWP	201810	B	1,356	679	50.07%	\$ 115,841.41	\$ 61,414.85	53.02%
PTWP	201811	B	1,215	650	53.50%	\$ 107,468.09	\$ 56,943.82	52.99%
PTWP	201812	B	1,233	661	53.61%	\$ 110,059.75	\$ 56,063.00	50.94%
PTWP	201901	B	1,374	695	50.58%	\$ 122,493.11	\$ 59,466.40	48.55%
PTWP	201902	B	1,297	698	53.82%	\$ 116,231.80	\$ 60,625.00	52.16%
PTWP	201903	B	1,323	703	53.14%	\$ 117,224.58	\$ 60,346.98	51.48%
PTWP	201904	B	1,305	731	56.02%	\$ 116,085.36	\$ 63,033.08	54.30%
PTWP	201905	B	1,352	705	52.14%	\$ 112,567.45	\$ 59,496.30	52.85%
PTWP	201906	B	1,292	708	54.80%	\$ 101,288.11	\$ 55,658.78	54.95%
PTWP	201907	B	1,234	635	51.46%	\$ 101,046.59	\$ 53,682.74	53.13%
PTWP	201908	B	1,180	584	49.49%	\$ 96,456.93	\$ 48,145.76	49.91%
PTWP	201909	B	1,108	551	49.73%	\$ 93,278.67	\$ 46,578.58	49.93%
PTWP	201910	B	1,307	709	54.25%	\$ 112,003.02	\$ 60,009.05	53.58%
PTWP	201911	B	903	505	55.92%	\$ 79,310.58	\$ 42,520.18	53.61%
PTWP	201912	B	1,142	636	55.69%	\$ 101,016.87	\$ 53,761.84	53.22%
PTWP	202001	B	1,124	576	51.25%	\$ 99,141.54	\$ 48,348.69	48.77%
PTWP	202002	B	1,093	599	54.80%	\$ 96,589.59	\$ 50,414.06	52.19%
PTWP	202003	B	1,159	606	52.29%	\$ 101,388.69	\$ 50,776.00	50.08%
PTWP	202004	B	1,064	560	52.63%	\$ 90,829.63	\$ 45,797.02	50.42%
PTWP	202005	B	1,087	573	52.71%	\$ 90,328.36	\$ 46,369.65	51.33%
PTWP	202006	B	1,134	604	53.26%	\$ 92,959.79	\$ 49,323.57	53.06%
PTWP	202007	B	1,139	566	49.69%	\$ 93,304.23	\$ 45,211.85	48.46%
PTWP	202008	B	1,126	571	50.71%	\$ 92,050.64	\$ 45,519.70	49.45%
PTWP	201810	C	1,013	544	53.70%	\$ 107,824.59	\$ 61,282.95	56.84%
PTWP	201811	C	911	493	54.12%	\$ 99,550.34	\$ 53,545.75	53.79%
PTWP	201812	C	908	475	52.31%	\$ 100,771.85	\$ 50,813.00	50.42%
PTWP	201901	C	1,026	552	53.80%	\$ 114,170.84	\$ 60,150.61	52.68%
PTWP	201902	C	987	562	56.94%	\$ 110,361.66	\$ 61,581.00	55.80%
PTWP	201903	C	1,001	551	55.04%	\$ 111,620.29	\$ 59,800.00	53.57%
PTWP	201904	C	1,001	566	56.54%	\$ 111,369.30	\$ 61,959.73	55.63%
PTWP	201905	C	1,050	586	55.81%	\$ 108,007.47	\$ 61,807.47	57.23%
PTWP	201906	C	988	555	56.17%	\$ 96,904.83	\$ 55,533.94	57.31%
PTWP	201907	C	977	543	55.58%	\$ 98,745.40	\$ 56,860.00	57.58%
PTWP	201908	C	947	514	54.28%	\$ 95,234.37	\$ 53,390.33	56.06%
PTWP	201909	C	902	463	51.33%	\$ 91,336.98	\$ 48,580.09	53.19%
PTWP	201910	C	1,088	585	53.77%	\$ 110,614.02	\$ 60,849.33	55.01%
PTWP	201911	C	728	396	54.40%	\$ 76,544.13	\$ 41,243.13	53.88%
PTWP	201912	C	937	521	55.60%	\$ 99,589.86	\$ 53,708.72	53.93%
PTWP	202001	C	899	496	55.17%	\$ 94,021.78	\$ 51,241.00	54.50%
PTWP	202002	C	869	505	58.11%	\$ 90,028.90	\$ 51,846.34	57.59%
PTWP	202003	C	921	528	57.33%	\$ 93,104.42	\$ 52,698.66	56.60%

PTWP	202004	C	840	510	60.71%	\$ 83,757.32	\$ 50,401.00	60.18%
PTWP	202005	C	824	493	59.83%	\$ 78,234.43	\$ 46,228.00	59.09%
PTWP	202006	C	895	548	61.23%	\$ 83,951.54	\$ 51,520.00	61.37%
PTWP	202007	C	872	515	59.06%	\$ 81,825.78	\$ 48,143.47	58.84%
PTWP	202008	C	864	482	55.79%	\$ 81,374.47	\$ 44,997.40	55.30%
PTWP	201810	D	272	91	33.46%	\$ 28,566.29	\$ 10,668.24	37.35%
PTWP	201811	D	250	78	31.20%	\$ 28,178.07	\$ 8,988.27	31.90%
PTWP	201812	D	261	82	31.42%	\$ 30,717.84	\$ 9,289.00	30.24%
PTWP	201901	D	279	92	32.97%	\$ 32,567.22	\$ 10,503.00	32.25%
PTWP	201902	D	264	97	36.74%	\$ 30,956.26	\$ 10,990.98	35.50%
PTWP	201903	D	270	104	38.52%	\$ 31,886.30	\$ 12,112.00	37.98%
PTWP	201904	D	273	102	37.36%	\$ 31,634.69	\$ 12,094.41	38.23%
PTWP	201905	D	282	122	43.26%	\$ 28,907.69	\$ 13,455.18	46.55%
PTWP	201906	D	269	131	48.70%	\$ 26,260.02	\$ 13,252.63	50.47%
PTWP	201907	D	264	108	40.91%	\$ 26,797.01	\$ 11,877.29	44.32%
PTWP	201908	D	247	92	37.25%	\$ 24,578.14	\$ 10,222.33	41.59%
PTWP	201909	D	246	96	39.02%	\$ 25,445.71	\$ 11,109.11	43.66%
PTWP	201910	D	289	98	33.91%	\$ 30,154.45	\$ 10,820.69	35.88%
PTWP	201911	D	189	65	34.39%	\$ 20,829.96	\$ 7,361.58	35.34%
PTWP	201912	D	248	93	37.50%	\$ 27,304.62	\$ 10,459.00	38.30%
PTWP	202001	D	242	87	35.95%	\$ 26,639.58	\$ 9,544.58	35.83%
PTWP	202002	D	232	92	39.66%	\$ 25,474.00	\$ 10,028.00	39.37%
PTWP	202003	D	233	91	39.06%	\$ 25,177.61	\$ 9,853.61	39.14%
PTWP	202004	D	221	96	43.44%	\$ 23,494.24	\$ 9,991.31	42.53%
PTWP	202005	D	222	92	41.44%	\$ 21,947.37	\$ 9,008.00	41.04%
PTWP	202006	D	233	99	42.49%	\$ 22,651.68	\$ 9,775.00	43.15%
PTWP	202007	D	239	100	41.84%	\$ 23,054.38	\$ 9,815.00	42.57%
PTWP	202008	D	242	97	40.08%	\$ 23,206.87	\$ 9,396.00	40.49%

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

**Interrogatories of the Office of Consumer Advocate
Set I**

10. Please define “unjustifiable usage” (USECP, page 10). Separately state by month, since October 2018, the number of CAP participants who have:
- a. been found to have “unjustifiable usage”; and
 - b. been removed from CAP for having “unjustifiable usage.”

Company Response:

Submitted by: Rita Black, Director of Customer Relations

Dated: September 29, 2020

The Company’s CAP administrator completes the monitoring process for CAP accounts that incur excess usage. This data is stored in their system, however it is not stored by FPL and can therefore not be reported in that manner. The number of unjustified usage cases is shown on the chart on the following page. The proposal to remove customers from CAP for unjustifiable CAP credits is included in the proposed plan and has not yet been approved, therefore no customers have been removed for unjustifiable excess usage.

Month/Year	# Unjustified
October 2018	0
November 2018	0
December 2018	0
January 2019	0
February 2019	5
March 2019	0
April 2019	0
May 2019	0
June 2019	3
July 2019	3
August 2019	0
September 2019	7
October 2019	1
November 2019	0
December 2019	0
January 2020	5
February 2020	4
March 2020	0
April 2019	0
May 2019	0
June 2019	0
July 2019	0
August 2019	0

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

**Interrogatories of the Office of Consumer Advocate
Set I**

11. Please define unjustified CAP credits exceeding \$1,000 (USECP, page 10). Separately state by month, since October 2018, disaggregated by Federal Poverty Level, the number of CAP participants who have:
- a. been found to have CAP credits exceeding \$1,000;
 - b. been found to have CAP credits “unjustifiably” exceeding \$1,000;
 - c. been removed from CAP for having CAP credits which unjustifiably exceed \$1,000.

Company Response:

Submitted by: Rita Black, Director of Customer Relations

Dated: September 29, 2020

The Company’s CAP administrator completes the monitoring process for CAP credits exceeding \$1,000. This data is stored in their system, however it is not stored by FPL and can therefore not be reported in that manner. The table on the following page lists those who had CAP credit exceeding \$1,000 in total as well as the subset for whom excess usage was not justifiable. The proposal to remove customers from CAP for unjustifiable CAP credits is included in the proposed plan and has not yet been approved, therefore no customers have been removed for unjustifiable CAP credits above \$1,000.

Month/Year	Unjustified	Total (includes unjustified)
Oct-18	0	1
Nov-18	0	60
Dec-18	0	2
Jan-19	0	111
Feb-19	3	435
Mar-19	0	37
Apr-19	0	0
May-19	0	0
Jun-19	4	64
Jul-19	5	174
Aug-19	0	12
Sep-19	0	1
Oct-19	0	0
Nov-19	0	0
Dec-19	0	3
Jan-20	10	170
Feb-20	5	134
Mar-20	1	9
Apr-20	0	0
May-20	0	0
Jun-20	0	0
Jul-20	0	0
Aug-20	0	0
Sep-20	0	14