

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held June 16, 2022

Commissioners Present:

Gladys Brown Dutrieuille, Chairman
John F. Coleman, Jr., Vice Chairman
Ralph V. Yanora

Philadelphia Gas Works Universal Service and
Energy Conservation Plan for 2023-2027
Submitted in Compliance with 52 Pa. Code
§ 62.4

Docket No. M-2021-3029323

**ORDER DIRECTING SUPPLEMENTAL INFORMATION AND
ESTABLISHING COMMENT PERIOD**

BY THE COMMISSION

On October 29, 2021, Philadelphia Gas Works (PGW), a jurisdictional natural gas distribution company (NGDC), filed its proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP) in compliance with 52 Pa. Code § 62.4, relating to natural gas universal service and energy conservation reporting requirements, at Docket No. M 2021-3029323. By this Order, we indicate issues that require further attention on the record and invite stakeholder comment.¹

¹ Orders such as this one have previously been entitled “Tentative Order.” Tentative decisions of the Commission are subject to exceptions and become final without further Commission action if no exceptions are filed under 52 Pa. Code § 5.533(a). *See* 52 Pa. Code § 5.536(b) (relating to effect of failure to file exceptions). A request for further information prior to Commission action on a proposal from a public utility is not a Commission decision that could become final if no exceptions are filed; it is not a tentative approval of the public utility’s proposal. We now refer to such orders requesting further information and clarification as “orders directing supplemental information”.

I. BACKGROUND

NGDCs serving more than 100,000 residential accounts must periodically submit proposed USECPs to the Commission for approval.^{2, 3} USECPs are comprised of four programs to help low-income customers maintain utility service. The four programs are as follows: (1) a customer assistance program or CAP designed as an alternative to traditional collection methods for low-income residential customers; (2) a low-income usage reduction program or LIURP to provide weatherization and usage reduction services to help low-income customers reduce their utility bills; (3) a Customer Assistance Referral Evaluation Services program or CARES to provide referral services for low-income, special needs customers; and (4) a hardship fund to provide grants to eligible customers that require assistance to meet basic energy needs.

Policy Statement on Customer Assistance Programs, 52 Pa. Code §§ 69.261-69.267 (2020) (CAP Policy Statement 2020), Docket No. M-2019-3012599

The Commission's CAP Policy Statement was amended effective March 21, 2020, pursuant to an order and annex entered on November 5, 2019, (November 2019 Order and November 2019 Annex), and published in the *Pennsylvania Bulletin*, at 50 Pa.B 1652, on March 21, 2020. *See Final Policy Statement and Order*, Docket No. M-2019-3012599 (order and annex entered on November 5, 2019).

The November 2019 Order, *inter alia*, strongly urged electric distribution companies (EDCs) and NGDCs to incorporate the CAP policy amendments into its

² In 2020, PGW served an average of 486,934 residential accounts. *2020 Report on Universal Service and Collection Performance* at 5. [2020-universal-service-report-final.pdf \(pa.gov\)](https://www.psc.pa.gov/Portals/0/2020-universal-service-report-final.pdf).

³ NGDCs are subject to the universal service reporting regulations at 52 Pa. Code §§ 62.1-62.8, relating to natural gas supply customer choice, and the low-income usage reduction regulations at 52 Pa. Code §§ 58.1-58.18, relating to residential low-income usage reduction programs. NGDCs are guided by the recommendations in the CAP Policy Statement (2020) at 52 Pa. Code §§ 69.261-69.267 (2020).

USECPs to allow stakeholders to have a basis for meaningful input in *Universal Service Rulemaking*.⁴ November 2019 Order at 2.

Universal Service and Energy Conservation Plan Filing Schedule (Docket No. M-2019-3012601)

By order⁵ entered on October 3, 2019, in *Universal Service and Energy Conservation Plan Filing Schedule*, Docket No. M-2019-3012601, the Commission established a new USECP filing schedule and extended the duration of USECPs from three years to at least five years. The October 2019 Order directed NGDCs and EDCs to provide updated enrollment and budget projections for the extended terms of their existing USECPs based on the new filing schedule. PGW's 2017-2020 USECP (2017 USECP) was extended through 2022.

II. HISTORY

PGW is a city natural gas distribution operation as that term is used in Section 2212 of the Pennsylvania Public Utility Code (Code), 66 Pa. C.S. § 2212. As a city natural gas distribution operation, Title 66 of the Code, other than Chapters 11 (regarding certificates of public convenience), 19 (regarding securities and obligations) and 21 (regarding relations with affiliated interests), applies to PGW with the same force as if PGW were a public utility as defined in Section 102 of the Code, 66 Pa. C.S. § 102 (regarding definitions). Thus, for the purposes of universal service and energy

⁴ On January 2, 2020, the Commission entered an order at Docket No. L-2019-3012600 directing its Bureau of Consumer Services (BCS) and Law Bureau to initiate a comprehensive universal service rulemaking.

⁵ <http://www.puc.pa.gov/pcdocs/1638860.docx>.

conservation, PGW is subject to the same requirements, policies, and provisions applicable to a NGDC.⁶

2017 USECP (Docket No. M-2016-2542415)

PGW first filed its proposed 2017 USECP on April 28, 2016, at Docket No. M-2016-2542415 and was ultimately directed to revise its proposed 2017 USECP by order entered on August 3, 2017 (August 2017 Order). The August 2017 Order directed PGW to file an annual report detailing the number of customers served through CARES case management and “quick-fix” referral services on April 1 of each year through 2020.⁷ Furthermore, the August 2017 Order directed PGW to file a quarterly progress report to advise the Commission and other stakeholders of PGW’s ongoing Hardship Fund discussions with the Utility Emergency Services Fund (UESF).⁸ August 2017 Order at 91, OPs #6 and #7. PGW’s 2017 USECP was subsequently approved by order entered on October 5, 2017, at Docket No. M-2016-2542415.

January 2020 Letter and January 2020 Addendum to PGW’s Existing 2017 USECP

On January 6, 2020, PGW filed a Cover Letter and 2020 Addendum (collectively, the January 2020 filing). The 2020 Addendum reflected the extended duration through 2022 for its 2017 USECP and included, *inter alia*, updated enrollment and budget projections for 2021 and 2022. The Cover Letter outlined a proposal to implement a Pilot

⁶ The terms “natural gas distribution utility/NGDU” and “electric distribution utility/EDU” are used on occasion interchangeably with “natural gas distribution company/NGDC” and “electric distribution company/EDC,” respectively, in Title 66 of the Pennsylvania Consolidated Statutes, Title 52 of the Pennsylvania Code, and Commission orders.

⁷ Annual updates were filed on April 1, 2019, and March 30, 2020.

⁸ Quarterly updates were filed on January 4, 2018, April 12, 2018, July 11, 2018, October 11, 2018, December 28, 2018, April 5, 2019, June 27, 2019, October 1, 2019, December 23, 2019, March 30, 2020, and July 17, 2020.

Program and other Customer Responsibility Program (CRP, PGW's CAP) changes consistent with the recent amendments to the CAP Policy Statement (2020).

Petition to Expedite Review (Docket Nos. M-2016-2542415 & P-2020-3018867)

The January 2020 filing was not initially docketed as a petition to amend the 2017 USECP. The January 2020 filing was, however, subsequently re-docketed as a petition⁹ to amend PGW's 2017 USECP when PGW filed and served a Petition on February 21, 2020 (February 2020 Petition) to expedite review of the January 2020 filing. The February 2020 Petition was subsequently filed at Docket Nos. M-2016-2542415 and P-2020-3018867.

On March 2, 2020, the Low Income Advocates¹⁰ and the Office of Consumer Advocates (OCA) separately filed comments on the January 2020 Petition.

On March 19, 2020, the Office of Small Business Advocate (OSBA) filed and served a Notice of Appearance and a Notice of Intervention/Public Statement.

On March 26, 2020, the Commission entered an Order (March 2020 Order) at Docket No. P-2020-3018867 addressing PGW's January 2020 filing. The March 2020 Order approved changes to PGW's CRP relative to its 2017 USECP as a Pilot Program. Specifically, the March 2020 Order approved:

- Charging CRP customers with incomes at or below 50% of the Federal Poverty Income Guidelines (FPIG) a maximum of 4% of income or their

⁹ For ease of reference, we shall refer to the components of the January 2020 filing as the January 2020 Letter and the January 2020 Addendum.

¹⁰ The Low Income Advocates consist of the Tenant Union Representative Network (TURN), Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

average bill, whichever is less, and CRP customers with incomes above 50% and below 150% of the FPIG a maximum of 6% of income or their average bill, whichever is less.

- Continuing the consumption limit program as a pilot to run concurrently with the CRP Pilot Program. The consumption limit pilot program would place CRP customers whose annual usage exceeds 2,290 CCF on the average bill program for the remainder of the credit limit period.
- Discontinuing the Conservation Incentive Credit pilot program after credits are awarded in 2020 and provide notice of the discontinuance of the Conservation Incentive Credit program consistent with its prior notice of the program.
- Adopting PGW's Consumer Education and Outreach Plan (CEOP).

March 2020 Order at 22, OP #4.

The March 2020 Order also directed PGW to:

- File an amended 2017 USECP consistent with the March 2020 Order within 15 days of the entry date of the order. March 2020 Order at 23, OP #6.
- Implement approved provisions of its January 2020 filing by or before September 30, 2020. March 2020 Order at 22, OP #4.
- File and serve monthly status reports on the implementation timeline of the Pilot Program and other approved changes. March 2020 Order at 23, OP #7.

- Track the CRP Pilot Program costs on a monthly basis and file and serve a report detailing these costs at these dockets on a quarterly basis. March 2020 Order at 23, OP #8.

Consistent with the March 2020 Order, PGW filed an updated 2017 USECP on April 10, 2020.¹¹ PGW also filed monthly status reports on the implementation of its CRP Pilot Program from May 2020 through October 2020. Additionally, PGW filed quarterly reports on CRP Pilot Program costs at Docket No. P-2020-3018867 on January 15, 2021, April 16, 2021, July 15, 2021, and September 15, 2021,¹² and November 1, 2021.

On April 10, 2020, OSBA and OCA separately filed Petitions for Reconsideration regarding the March 2020 Order. The Commission did not grant these Petitions.

OSBA and OCA subsequently filed appeals in Commonwealth Court. OSBA: *Evans, J., et al. v. PA PUC*, 421 C.D. 2020 (*Evans*); OCA: *McCloskey, T. v. PA PUC*, 422 C.D. 2020 (*McCloskey*). The appellants did not request a stay of implementation of the March 26 Order. By order entered on September 15, 2020, the Commonwealth Court granted the Commission's Application to Consolidate the appeals. Consolidated opinion as *Evans and McCloskey*.

On September 29, 2021, the Commonwealth Court issued an unreported memorandum opinion vacating the March 2020 Order and directing the Commission "to provide evidentiary proceedings and issue a new decision" regarding the January 2020 filing. *Evans and McCloskey* at 30-31. The Commission subsequently assigned this

¹¹ The Commission did not approve this compliance filing.

¹² PGW filed a correction to the September 2021 update on October 8, 2021.

matter to the Office of the Administrative Law Judge (OALJ) in accordance with the Commonwealth Court's directive.

On October 25, 2021, PGW filed a Petition (October 2021 Petition) at Docket Nos. M-2016-2542415 and P-2020-3018867 requesting that the Commission:

- Issue an order directing PGW to maintain its CRP Pilot Program on a temporary basis until a final Commission order is issued in the proceeding;
- Set a schedule for an expedited proceeding consistent with the Commonwealth Court's decision; and
- Direct the OALJ to develop a certified record to be submitted to the Commission for decision.

October 2021 Petition at 1.

On January 4, 2022, the OALJ issued an Interim Order (January 2022 Order) at Docket P-2020-3018867 granting, in part, the October 2021 Petition. The January 2022 Order, *inter alia*, granted PGW's request to maintain its CRP Pilot Program during the pendency of the proceeding until the Commission enters a Final Order "or the presiding officers or Commission otherwise direct." January 2022 Order at 4, OP #1.

2020 Base Rate Case, Docket No. R-2020-3017206

On February 28, 2020, PGW filed for a general rate increase at Docket No. R-2020-3017206. On August 26, 2020, a Joint Petition for Partial Settlement (2020 Rate

Case Settlement)¹³ was filed, providing, *inter alia*, for changes impacting PGW's universal service programs. The Administrative Law Judge's (ALJ's) October 5, 2020, Recommended Decision recommended approval of the 2020 Rate Case Settlement, with no modification to the universal service provisions. By Order entered on November 19, 2020, *inter alia*, the Commission approved the 2020 Rate Case Settlement. November 19, Order at OP #6.

As articulated in the 2020 Rate Case Settlement, PGW, *inter alia*, agreed that it would do the following:

- Provide an annual training to Community Based Organizations (CBOs) on how to use the CRP application tool and include information about promoting CRP enrollment. 2020 Rate Case Settlement at 13, ¶33(a).
- Create a video explaining how to apply for CRP online and post the video on its website and social media.¹⁴ Non-contact methods for CRP applications (call for application, mail-in, online) will also be publicized. 2020 Rate Case Settlement at 13, ¶33(b).
- Review and adjust CRP asked-to-pay amounts quarterly as part of its new Customer Information System (CIS) and increase/decrease the asked-to-pay amount if the average bill amount has changed. 2020 Rate Case Settlement at 13, ¶33(c).
- Roll over unspent 2019 and 2020 LIURP funds into the next program year through

¹³ The Joint Petitioners, active parties in the 2020 Base Rate Case, were: PGW, the Bureau of Investigation and Enforcement (BIE), OCA, OSBA, and the Philadelphia Industrial and Commercial Gas User Group (PICGUG).

¹⁴ PGW posted the video on its website at <https://www.pgworks.com/customer-care/crp>. The video can be found directly at the following link, <https://youtu.be/RWYjiPPKp28>. Accessed on May 2, 2022.

the end of the 2017 USECP (*i.e.*, 2023), until expended. 2020 Rate Case Settlement at 13, ¶33(d).

- Mail two letters seeking to obtain landlord approval to perform LIURP services for a tenant. If a telephone number is available, one of the letters will be replaced with a telephone call to the landlord. 2020 Rate Case Settlement at 13, ¶33(e).
- Expand translation services by (1) offering spoken language translation services for service center communications; (2) provide annual training and documentation to customer service representatives on how to use translation services; and (3) work with its USAC to identify 10 universal service, safety, and customer service documents that will be made available in up to five languages (other than English and Spanish) and make them available on the PGW website. 2020 Rate Case Settlement at 16, ¶38(a-c).
- Work with its Universal Services Advisory Committee (USAC) to refine its Consumer Education and Outreach Plan (CEOP), specifically addressing outreach to low-income customers in the 0%-50% tier of the Federal Poverty Income Guidelines (FPIG). 2020 Rate Case Settlement at 16, ¶39.
- Review the reasons why customers were denied enrollment or recertification into CRP for inability to verify income, including whether a customer provided income and was rejected because it was unacceptable to determine whether PGW's list of acceptable verification documents should be expanded. 2020 Rate Case Settlement at 17, ¶42.

Proposed 2023 USECP (Docket No. M-2021-3029323)

In compliance with Commission regulations and the October 3, 2019 Order, PGW filed its Proposed 2023 USECP on October 29, 2021, and served OCA; OSBA; the Clean Air Council of Philadelphia; CLS; TURN; the Pennsylvania Utility Law Project (PULP), Counsel for CAUSE-PA; PICGUG; BIE; the Commission's Bureau of Consumer Services (BCS); and the Commission's Law Bureau.

On February 23, 2022, Commission staff in BCS convened a telephonic meeting to allow stakeholders an opportunity to provide informal comments and questions about the Proposed 2023 USECP prior to issuance of a Commission order. Representatives from CLS, PGW, PULP, OCA, OSBA, and BIE were invited to participate.¹⁵

III. DISCUSSION

A. Summary of Proposed Modifications to the Universal Service Programs in the Proposed 2023 USECP

The Proposed 2023 USECP proposes to permanently adopt the changes proposed in its January 2020 filing, except with modifications to its consumption limit program. Changes proposed in the January 2020 filing are under review in the OALJ evidentiary proceeding at Docket No. P-2020-3018867 and will not be addressed in this proceeding.

The following are a summary of new changes in the Proposed 2023 USECP, which are not part of the OALJ proceeding. Each will be discussed in greater detail below the summary.

¹⁵ Representatives from the Philadelphia based organizations POWER and Utility Emergency Services Fund (UESF) were present at the meeting.

1. Proposed CRP Modifications

- Expand acceptable CRP income documentation to include individual taxpayer identification numbers (ITIN) and “other” to allow for an open-ended option for documentation.
- Expand CRP recertification timeframe from one year to every two years. Customers reporting no income will remain on a six-month recertification timeframe and Low-Income Home Energy Assistance Program (LIHEAP) recipients on a three-year recertification timeframe.
- Customers restoring service after termination for non-payment will not need to reapply for CRP if they were on CRP when terminated in the past year.
- CRP participants who reach consumption limits will be referred for potential Home Comfort (*i.e.*, PGW’s LIURP) treatment and will receive outreach from CARES.
- Translate the paper CRP application into the following languages: Portuguese, Spanish, Mandarin, Russian, Arabic, Vietnamese, Ukrainian, Dari, Pashto, Swahili, French, Urdu, and Korean.
- Provide enhanced outreach specifically designed for customers with limited English proficiency. PGW proposes to provide details on the results of this outreach in its next USECP filing and discuss it with its USAC.

Proposed 2023 USECP at 3-4.

2. Proposed Home Comfort Modifications

- Continue the Low-Income Multi-Family Efficiency (LIME) Pilot Program through 2027.
- Continue the Health and Safety Pilot Program through 2027
- Implement a Repair and Renew Pilot Program that would provide heater and water heater repairs/replacement to the homes of confirmed low-income customers who were issued hazard tags from PGW, as described in greater detail below.

Proposed 2023 USECP at 4, 18-19, 21

3. Proposed CARES Modifications

PGW proposes no major changes to its CARES program in its Proposed 2023 USECP.

4. Proposed Hardship Fund Modifications

PGW proposed to implement a pilot Hardship Fund program that would serve eligible customers with incomes at or below 250% of the FPIG. Proposed 2023 USECP at 4, 27-28.

B. Program Descriptions Proposed for 2023-2027

1. CRP

PGW's CRP will continue to offer discounts off residential tariff rates to residential heating customers if their household income is equal to or less than 150% of the FPIG and the program will result in the most affordable payment option. Customers enrolled in CRP will be required to pay a fixed monthly bill that is based on their household size and gross income or an average bill, whichever is lower. Currently, the minimum monthly CRP payment amount is \$25. Proposed 2023 USECP at 5.

The program is intended to improve payment behavior, prevent loss of service, assist participants in conserving energy, reduce collection costs, and minimize the financial burden on non-CRP ratepayers. CRP is primarily funded by PGW's residential ratepayers via a Universal Service Surcharge in the Company's tariff.¹⁶ Proposed 2023 USECP at 16.

The primary features of PGW's CRP program include:

- Reduced monthly payments based on a percentage of income.
- Complete pre-program arrearage (PPA) forgiveness over a period of 36 months.

Proposed 2023 USECP at 6.

¹⁶ In 2020, the surcharge recovered 73.8% of CRP and LIURP costs from residential customers, 21.4% from commercial customers, 1.7% from industrial customers, 2.0% from municipal customers, and 1.1% from the Philadelphia Housing Authority. *2020 Report on Universal Service Programs & Collections Performance* at 87. <https://www.puc.pa.gov/media/1709/2020-universal-service-report-final.pdf>

Customers in the CRP program are required to:

- Make timely and in-full payments as billed;
- Report changes to income and/or household size;
- Apply for LIHEAP each year and assign the grant to PGW;
- Recertify income and household information every three years for households who receive a LIHEAP grant each year. Households who report no income must recertify every six months. All other households must recertify every two years;
- Accept Home Comfort program services if offered;
- Make an effort to conserve energy and manage usage within required consumption limits;
- Provide PGW access to the meter if requested;
- Authorize PGW to use external sources to verify household composition and income; and
- Agree to not commit any form of natural gas theft or fraud.

Proposed 2023 USECP at 7.

If an account meets any of the following criteria, the household is not eligible to participate in CRP:

- Commercial rate accounts;
- Accounts receiving the senior citizen discount;
- Accounts that supply service to more than one unit/apartment;
- Accounts currently enrolled with a natural gas supplier;
- Landlord tenant accounts where the service is in the landlord's name;
- Healthcare facilities;
- Accounts that are not the customer of record's primary residence;
- All accounts deemed by PGW to be excluded due to violation of one of the stay-out provisions; or
- Non-heat accounts.

Proposed 2023 USECP at 8.

The CRP payment amount is based on a percentage of the household's size and gross income. Table 1 reflects PGW's current Percent of Income payment (PIP) for each income level, which was established as part of its CRP pilot program. PGW is proposing

to maintain these PIP levels permanently in its 2023 USECP.¹⁷ Proposed 2023 USECP at 5.

Table 1
Percent of Income CRP payment

| FPIG Tier | Percent of Income Payment |
|------------------|----------------------------------|
| 0 - 50% | 4% |
| 51 - 100% | 6% |
| 101 - 150% | 6% |

CRP customers can have their PPA balances completely forgiven within three years (*i.e.*, 36 months) of entering the program. For each month that the customer pays his or her monthly CRP bill in full and on time, regardless of any existing in-CRP arrears, PGW will forgive 1/36th of the customer's PPA balance. Payments made in excess of the monthly CRP amount are first applied to any in-program arrears (IPA) and then as a credit toward the next month's bill. Proposed 2023 USECP at 5.

Customers are unable to re-enroll in CRP for a specified period if they are removed from the program for the following reasons: voluntary removal while eligible (stay-out for one year), refusing access to the meter (stay-out until access is granted), committing two or more incidents of unauthorized usage (stay-out for one year), submitting fraudulent information at application/recertification (stay-out for one year), or refusing Home Comfort services (stay-out until services are accepted).¹⁸ Proposed 2023 USECP 6-7.

¹⁷ These PIP levels and other matters related to the March 2020 Order are currently under review by the OALJ at Docket No. P-2020-3018867.

¹⁸ Customers will not be removed from CRP if they are unable to accept weatherization services due to health, safety, or structural issues in the home, serious illness of a household member, landlord refusal, or other severe circumstances outside the customer's control deemed valid by PGW. Proposed 2023 USECP at 6-7.

To further supplement our analysis of PGW’s CRP for the Proposed 2023 USECP, BCS reviewed over 200 informal complaints opened by CRP customers between January 2017 and December 2020. Staff have identified areas in PGW’s proposed CRP for 2023-2027 requiring clarification and potential modification as detailed below.

a. Income Documentation for Last 30 Days or 12 Months

PGW reports that it will continue to accept the last 30 days of income for household members to determine household income. PGW will also accept federal or state tax returns filed within the last 12 months as proof of self-employment income. Proposed 2023 USECP at 11-12.

PGW reports it uses gross year-to-date income to determine monthly household income if the customer has seasonal or “fluctuating” income. The Proposed 2023 USECP maintains that “dividing the gross year-to-date income by 12” provides a more accurate picture of the customer’s monthly income and can qualify a household for CRP that may have been ineligible based on the past 30 days of income. Proposed 2023 USECP at 11-12.

The Proposed 2023 USECP includes a list of professions where the seasonal/fluctuating income documentation policy (*i.e.*, using gross year-to-date income) may apply. Those professions include home health aides, catering workers, construction workers, and school district employees. Proposed 2023 USECP at 12.

It is unclear if PGW’s CRP income documentation policy gives all customers the choice of providing 12 months of income when applying for CRP as recommended in CAP Policy Statement (2020). 52 Pa. Code §69.265(8)(ii)(B)(I). Instead, it appears PGW only asks for 30 days of income (or tax returns if the income is from self-employment) and then uses gross year-to-date income to determine an average

monthly amount if the income source is deemed seasonal or fluctuating. The Commission has recommended that utilities give CAP applicants the option of selecting an income timeframe (*i.e.*, 30 days or 12 months) that is most representative of their true annual household income. See November 2019 Order at 41. Initially, we are not opposed to PGW using a household's gross year-to-date income to determine a household's average monthly income and CRP eligibility when it is reasonable to do so (*e.g.*, for seasonal workers or for school district employees who choose to receive their full salary during the school year).

However, BCS has received informal complaints from customers who have been determined ineligible based on PGW's seasonal/fluctuating income documentation policy. We have concerns about how this policy is described in the Proposed 2023 USECP and applied currently. The Proposed 2023 USECP states that gross year-to-date income is divided by 12 to determine a customer's monthly income amount. This description does not appear accurate based on informal complaints received by BCS. Instead, it appears that PGW has used the gross year-to-date income – instead of income from the past 30 days – to determine a customer's monthly income based on less than 12 months of earnings (*e.g.*, gross year-to-date income on June paystubs could be divided by six to calculate average monthly income for that year). In one BCS informal complaint, the customer provided pay stubs in October and was denied eligibility for CRP because her gross year-to-date amount reflected higher average monthly income over the course of the year.

It is also not clear how PGW staff determine when to apply this policy. The Proposed 2023 USECP provides examples of careers which may experience seasonal or

fluctuating income, but this list may not reflect all types of employment where income may be considered “fluctuating” by PGW staff.¹⁹

Part-time service industry workers, for example, whose weekly hours may change based on operational need, can also have incomes that could be categorized as “fluctuating.” These types of jobs may allow workers to work more hours on a temporary basis (*e.g.*, during periods of staff shortages or irregular overtime). For these types of workers, it may not be reasonable to assume that their gross year-to-date income is more representative of actual annual income than the monthly income earned during the past 30 days. We have concerns about PGW applying this policy arbitrarily and denying CRP eligibility to households that may have experienced temporary increases in earnings months before they applied for the program.

Clarification Required: In its response to this Order, PGW is directed to:

- Clarify whether customers are given the option of providing 30 days or 12 months of income through the CRP application process (*i.e.*, informed by PGW staff and through its paper/online application).
- Clarify whether the seasonal/fluctuating income documentation policy is applied only to gross year-to-date income that can be divided by 12. If not, specify the months in which this policy could be applied (*e.g.*, paystub information from June or later).

¹⁹ Further, not all careers listed may experience seasonal or fluctuating income. A home health aide, for example, may experience no gaps in employment through the year. However, hours for this type of employment may increase temporarily or regularly based on the needs of the patient(s) being served.

- Explain whether the seasonal/fluctuating income documentation policy applies only to households with certain types of employment or those with intermittent income (*e.g.*, part-time) or other criteria.
- Explain what instructions are given to PGW staff on when to apply the seasonal/fluctuating income documentation policy when determining CRP eligibility. Provide any relevant training materials.

PGW is also directed to include copies of its CAP applications, recertification letters, brochures, and any other written communications describing CAP income eligibility requirements to customers.

b. CRP Final Billing

The Commission issued the *Staff Review of Customer Assistance Program Final Billing Methods* order (CAP Final Billing Order) on March 12, 2020, at Docket No. M-2019-3010190. The CAP Final Billing Order detailed how electric and natural gas public utilities calculate final CAP bills, summarizes stakeholder input on the issues, and calls attention to existing statutory and regulatory provisions relating to billing. The CAP Final Billing Order did not recommend a standard CAP final billing policy but indicated these policies should comply with PUC statutes and regulations:

Section 1303, 66 Pa. C.S. § 1303, provides that public utilities must bill their customers for service rendered. Section 56.11(a) of Commission regulations, 52 Pa. Code § 56.11(a), require that a public utility render bills every billing period. Utilities are henceforth on notice that these statutory and regulatory provisions will be applied to the facts in all matters wherein we are called upon to review specific final CAP bills or recovery of universal service costs. Further, Section 1303 provides that public utilities are to compute bills under the rate most beneficial to the customer. *Generally speaking, it would appear that the starting point for any specific inquiry regarding the bill for usage in a partial final billing period as a*

CAP participant should be a comparison between a residential tariff rate calculation for energy consumed and the CAP price prorated for the number of days of service in the billing period. The other items on a bill such as true-ups, arrears, arrearage forgiveness, third-party assistance such as LIHEAP, and CAP credits and limits are separate considerations dependent on the customer's payment history and the utility's CAP provisions. We shall address how the energy utilities describe their final billing practices for CAP customers in utility-specific proceedings.

CAP Final Billing Order at 22 (emphasis added).

PGW does not describe its final CRP billing practice in its Proposed 2023 USECP. In the CAP Final Billing proceeding, PGW reported that a CRP final bill is based on residential tariff rate for the billing period. Additionally, PGW does not apply CRP credits to a customer's final bill. CAP Final Billing Order at 7.

We are not opposed to PGW's practice of charging the residential rate for usage in a final bill in circumstances when the tariff rate is less than the prorated CRP billing price. However, we are concerned that customers enrolled in CRP up until the date of service termination or discontinuance may be charged more than their prorated CRP billing price for usage incurred during their final billing period.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to describe its CRP final billing policy and explain whether this policy has changed since the Commission's CAP Final Billing proceeding. PGW is also directed to address how its final CRP billing practices reflect compliance with the relevant statutes and regulations as discussed in the CAP Final Billing Order.

c. Refund of Security Deposits

Both the statute and Commission regulations prohibit requiring a cash deposit for utility service from customers who are confirmed to be eligible for a CAP. *See* 66 Pa. C.S. § 1404(a.1)²⁰ and 52 Pa. Code § 56.32(e)²¹. Commission regulations also state that a public utility must “refund a deposit, along with any applicable interest, within 60 days upon determining that the customer or applicant from whom a deposit was collected is not subject to a deposit [...]” *See* 52 Pa. Code § 56.53(f).

The Proposed 2023 USECP does not describe PGW’s policy or practices regarding the waiving or refunding of security deposits for CRP-eligible customers.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to describe its policy and procedures regarding waiving or refunding security deposits for CRP customers.

d. LIHEAP

The Commission has recommended that public utilities instruct CAP customers to apply for LIHEAP annually, if eligible, but not require the household to assign a LIHEAP grant to the particular public utility to remain in CAP. The Commission also discourages a public utility from penalizing a household that does not apply for LIHEAP.

Specifically:

²⁰ 66 Pa.C.S. § 1404(a.1) provides that “no public utility may require a customer or applicant that is confirmed to be eligible for a customer assistance program to provide a cash deposit.”

²¹ 52 Pa. Code § 56.32(e) provides that “a public utility may not require a cash deposit from an applicant who is, based upon household income, confirmed to be eligible for a customer assistance program. An applicant is confirmed to be eligible for a customer assistance program by the public utility if the applicant provides income documents or other information attesting to his or her eligibility for state benefits based on household income eligibility requirements that are consistent with those of the public utility’s customer assistance programs.”

As low-income customers may participate in more than one CAP – or may use their LIHEAP grant to obtain a deliverable fuel source – these provisions^[22] are no longer appropriate as they could require households to choose between [EDC or NGDC] CAPs or between a CAP and a necessary fuel delivery.

November 2019 Order at 51.

In its January 2020 Letter, PGW stated that it does not require CRP customers to apply for LIHEAP or assign a LIHEAP grant to PGW to remain in the program. PGW asserted that maintaining the requirement that CAP customers must apply for LIHEAP “can serve as an encouragement to apply for LIHEAP monies with no penalty.” January 2020 Letter at 3. The Proposed 2023 USECP, however, states that a “program requirement” for CRP participation includes “apply[ing] for LIHEAP each year and assign[ing] the grant to PGW.” Proposed 2023 USECP at 7.

We have concerns about the discrepancy between the response by PGW that it takes no adverse action if a CRP customer does not apply for LIHEAP or assign a grant to PGW and the requirement specified in the Proposed 2023 USECP that CRP customers must do both to remain in the program. If the provision is enforced as written in the Proposed 2023 USECP, low-income customers could be removed from CRP at the end of each LIHEAP season if PGW has not received a LIHEAP grant for their account.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to clarify if the provision in the Proposed 2023 USECP regarding whether CRP customers must apply for LIHEAP annually and assign the grant to PGW is an actual CRP requirement.

²² The reference to “provisions” refers to recommendations in the CAP Policy Statement (1999) which stated that customers should direct the LIHEAP grant to the public utility sponsoring the CAP (Section 69.265(9)(i)) or be penalized for not applying for LIHEAP (Section 69.265(9)(ii) and (iv)).

e. LIHEAP Recertification

PGW proposes, on page 4 of the Proposed 2023 USECP, to recertify CRP customers receiving annual LIHEAP grants every three years. However, the Proposed USECP, at pages 7 & 14, states that LIHEAP recipients must recertify for CRP every two years.

Clarification Requested: Based on the discrepancies in the Proposed 2023 USECP, we find the recertification timeframe for CRP customers who receive annual LIHEAP grants is unclear. Accordingly, in response to this Order, PGW is directed to clarify the CRP recertification timeframe for LIHEAP recipients.

f. External sources used to verify CRP customers household composition and income

The Proposed 2023 USECP states that CRP participants must “[a]uthorize PGW to use external sources (e.g., government records, credit reporting bureaus, and third-party income verification sources) to verify household composition and income.” Proposed 2023 Plan at 7.

In its 2017 USECP proceeding, PGW clarified that it does not use information provided by credit report agencies to verify household income:

With respect to use of credit reporting agencies and CRP participation, PGW does not utilize credit reports for any purpose, whether to obtain income verification or otherwise. PGW may, however, submit a soft inquiry to a credit reporting agency (such as Experian or Transunion) to check such factors as residency and to perform death audits in order to ensure that incidents of fraud do not occur within the program. In the event there is an indicator of fraud or death, a letter will be sent to the customer asking them to contact the Company within two weeks to confirm the

information obtained. Applicants authorize PGW to perform these checks at the time of application. PGW does not, however, receive any detailed credit report from the credit agency and does not use these soft inquires to verify household composition and/or income.

PGW 2017 USECP Supplemental Information, Docket No. M-2016-2542415 (filed on February 15, 2017), at 11-12. Moreover, PGW reported it would provide customers with Fair Credit Reporting Act (FCRA)²³ rights in writing before removing a customer from CRP for fraud or evidence of death found from an inquiry. PGW 2017 USECP Supplemental Information at 12.

The Proposed 2023 Plan, however, continues to identify credit reporting bureaus and other third-party entities as potential income verification sources without explaining how this information will be used, how the customer will be informed before action is taken, and how the customer can dispute the information obtained from these sources.

Clarification Required: In its response to this Order, PGW should explain how it uses external sources to verify income and CRP household information and whether this process has changed since its 2017 USECP proceeding. If it is now using credit reporting information as part of its periodic reviews of CRP accounts, it should explain how this process complies with the FCRA.

g. Unearned Income for a Child

The Public Utility Code 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 (relating to definitions). In the November 2019 Order, the Commission adopted this definition for household income in the CAP Policy Statement

²³ 15 U.S.C § 1681 (2018), Fair Credit Reporting Act.

(2020)²⁴ and noted that the Section 1403 statutory definition is already used to establish Commission payment arrangement requests and recommended this definition be applied to determining CAP household income as well.

Adopting the Chapter 14 definition will provide a single definition to be used by both the Commission and the energy utilities and should facilitate greater consistency among utilities in determining and documenting household income. This should work towards eliminating disparate parameters of CAP qualifications among the EDCs and NGDCs with the goal of fostering more uniformity in program implementation.

November 2019 Order at 79. Although public utilities are not mandated to automatically adopt all provisions of the CAP Policy Statement, they are required to comply with the Public Utility Code.

The Proposed 2023 USECP does not specify whether PGW's CRP eligibility and benefits are based on the combined gross income of all household members or only adults. In its January 2020 Letter, PGW stated that it intended to continue excluding earned income minors but will count unearned income of a minor when determining household income, consistent with LIHEAP income eligibility requirements.

January 2020 Letter at 7.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to clarify how household income will be calculated, whether earned or unearned income of minors will be counted, and what documentation a household can provide to document income. If PGW is proposing to change how it defines or calculates "household income," it should identify the intended effective date of that change.

²⁴ See 52 Pa. Code § 69.262 (relating to definitions).

h. Verifying Zero-Income

In 2018, the Commission initiated a Universal Service Working Group (USWG) with a mandate that included standardizing utility zero-income forms. The USWG²⁵ met multiple times in 2018 and reached consensus on a standardized zero-income form that contains commonly asked questions if a CAP applicant claims no income. In the November 2019 Order, the Commission approved USWG’s standardized zero-income form and recommended that public utilities develop and use standardized forms.²⁶ November 2019 Order at 63-65.

The Proposed 2023 USECP does not propose to use the standardized zero-income form for CRP. In its January 2020 Letter, PGW indicated it did not plan on adopting the standardized zero income form and asserted that the form is unnecessary for PGW, requires outdated submission methods (paper, fax), asks only for adult household income, and treats ongoing support from friends/family as uncounted income (PGW counts ongoing support as income for CAP). January 2020 Letter at 5. Instead, the Proposed 2023 USECP states that PGW customers who report zero income and no other means of financial support are asked to complete an assessment, in addition to the CRP application, to describe how they meet basic expenses for food, housing, and utilities. Proposed 2023 UCECP at 13.

Clarification Required: We are not taking issue with PGW’s decision to not adopt the USWG’s standardized zero-income form as the use of such forms is voluntary. However, we would like more details about what information PGW requests in its assessment when verifying zero-income. PGW should also explain how “ongoing support” from friends

²⁵ The USWG included representatives from the EDCs, NGDCs, PULP, OCA, United Way, Dollar Energy Fund, the Keystone Energy Efficiency Alliance, and OSBA.

²⁶ The November 2019 Order also amended the CAP Policy statement to encourage public utilities to develop and use standardized CAP forms and CAP procedures. *See* November 2019 Order at 64-65; Section 69.265(14) of the CAP Policy Statement (2020).

and family is documented and whether this support includes monies given directly to the household or payment of household bills by a third-party (e.g., rent/mortgage, utility bills, etc.). Accordingly, in its response to this Order, PGW is directed to provide a copy of its zero-income assessment and explain how “ongoing support” from friends and family is counted and documented.

i. Exempt CAP Customers from Late Payment Charges

The CAP Policy Statement (2020) recommends that public utilities exempt CAP customers from late payment charges or fees. 52 Pa. Code § 69.265(6).

PGW reports that it currently complies with this CAP recommendation. January 2020 Letter at 4. However, the Proposed 2023 USECP does not specify whether CAP customers are exempt from late payment charges or fees.

Clarification Required: In its response to this Order, PGW is directed clarify whether late payment charges or fees are waived for CRP customers.

j. Transfer of Service

The CAP Policy Statement (2020) recommends that public utilities allow CAP households to retain CAP enrollment when they transfer service within the public utility’s (or an affiliate’s) service territory. 52 Pa. Code § 69.265(10).

PGW reports that this provision is already in place. January 2020 Letter at 4. However, the Proposed 2023 USECP does not specify that CAP households may retain CAP enrollment when they transfer service within PGW’s service territory.

Clarification Required: In its response to this Order, PGW is directed to clarify whether CRP households retain program enrollment when they move to another residence and establish natural gas service within PGW's service territory. If PGW maintains such a practice, it should explain how the process works and what timeframes are given to the customer to notify PGW about service at a new residence after service at the previous residence is discontinued.

k. Evaluating Household CAP Bills

In the November 2019 Order, the Commission found that evaluating CAP payment calculations at least once per quarter, as opposed to longer intervals, is more likely to result in program recipients receiving the most appropriate discount amount and/or billing option. *See* November 2019 Order at 74-75, Section 69.265(8)(vii).

As described above, customers in CRP are charged the PIP amount or budget bill, whichever is lower. Proposed 2023 USECP at 6. The Proposed 2023 USECP states that PGW will continue its current practice of evaluating CRP monthly bill amounts once per year. Proposed 2023 USECP at 15. In its 2020 Rate Case Settlement that was approved by the Commission, PGW agreed to review its CRP monthly bill amounts quarterly upon implementation of its new CIS. 2020 Rate Case Settlement at 13, ¶33(c).

Clarification Required: We find that annual review of CRP bill amounts, as described in the Proposed 2023 USECP, is inconsistent with PGW's obligations under the 2020 Rate Case Settlement. Therefore, there is no question about whether PGW should review CRP bill amounts quarterly; the only question is when this process will commence.

Accordingly, in its response to this Order, PGW is directed to:

- Identify when its new CIS is scheduled to be implemented.

- Identify when quarterly review of CRP bill amounts will begin.
- Include this new process and timeline in its 2023 USECP.

l. Identification Documentation

PGW states on page 12 of the Proposed 2023 USECP that it will accept some “other” form of identification if customers cannot or will not provide their social security number. PGW provides examples such as a state-issued driver’s license number or Individual Tax Identification number as alternative forms of acceptable verification. However, it is not clear if this list is exhaustive or if PGW will accept additional types of alternative identification.

Clarification Required: In its response to this Order, PGW is directed to identify whether there are other forms of alternative identification it accepts, beyond those listed in the Proposed 2023 USECP.

m. Outreach and Education Plan²⁷

The Proposed 2023 USECP includes a CEOP that describes, *inter alia*, PGW’s direct customer outreach initiatives, including direct contacts, mass media campaigns, and community outreach. PGW describes its direct contacts as mailings, outbound calls, and bill inserts. PGW describes its mass media campaigns as advertisements through radio, TV, and newspapers. Additionally, PGW promotes programs through its website

²⁷ The CAP Policy Statement (2020) recommends that a public utility develop and incorporate a CEOP as part of its USECP which identifies, *inter alia*, (1) information on benefits and responsibilities of CAP participation and the importance of energy conservation; (2) efforts to educate and enroll eligible and interested customers with incomes at or below 50% of the FPIG; and (3) resources, services, and translated materials available to those customers who are of Limited English Proficiency (LEP). 52 Pa. Code §§ 69.265(8)(i) and 69.265(8)(vi).

and has applications that customers can download. PGW notes that its CRP application is available in 13 languages (hard copy only). Proposed 2023 USECP at 4. PGW indicates its local outreach includes community events, partnerships, workshops, presentations, and brochures and other outreach materials. 2023 USECP at 48-49.

Clarification Required: It is unclear which of these CEOP initiatives are existing and which are new proposals or how languages for CRP application translations were selected. Therefore, we require additional information about PGW's CEOP initiatives.

Accordingly, in its response to this Order, PGW is directed to provide the following clarifications and information related to its CEOP initiatives:

- Indicate which CEOP initiatives are new (*i.e.*, implemented in 2019 or later) and which initiatives represent existing, ongoing practices to help its most vulnerable customers (*e.g.*, at or below 50% of the FPIG, LEP, impacted by COVID-19).
- Explain how it educates customers on how to determine their own “household energy burden” to help encourage interest and participation in CRP and stimulate actions for energy conservation in the household.
- Explain whether and how the components of its CEOP are provided to each community within its service territory.
- Provide copies of its CRP brochures and customer bill inserts that outline the program guidelines and customer responsibilities.
- Provide an explanation of how it chose which languages to translate its CRP application into.

2. Home Comfort

PGW's Home Comfort will continue to assist low-income customers in reducing their energy usage and bills through cost-effective weatherization services and energy conservation education. A secondary goal of Home Comfort is to reduce the overall long-term subsidy cost of CRP. PGW contracts with three independent conservation service providers (CSPs) to provide weatherization services. Each CSP undergoes a semi-annual evaluation. Proposed 2023 USECP at 18-19.

The primary weatherization measures provided by Home Comfort include, as necessary, air sealing, insulation, heating system improvements, repairs or replacements, hot water reduction measures, and energy conservation education. Proposed 2023 USECP at 20.

To receive Home Comfort services, a single-family, low-income household must meet all of the following criteria:

- Known to be low income by having: (a) been on CRP over the prior 24 months; (b) received a LIHEAP, CRISIS or UESF grant over the prior 24 months; or (c) been on a Level 1 payment arrangement over the prior 24 months;
- Have weather normalized usage within the top 50% of all eligible customers and at least 12 months of continuous service at their current property;
- Have not received Home Comfort services over the previous seven years; and

- Reside in a single-family home. If the customer rents the home, the landlord must provide permission for PGW to perform weatherization measures.

Proposed 2023 USECP at 19.

The Proposed 2023 USECP proposes to continue the LIME pilot program and the Health and Safety pilot program. It also proposes to implement a new Repair and Renew pilot program. These pilot programs are described and discussed further below.

Staff identified potential areas of concern and potential deficiencies inherent in PGW's Home Comfort and Home Comfort pilot programs as detailed below.

a. LIME Pilot Program

PGW proposes to continue its LIME pilot program through the duration of its 2023 USECP. Customers living in multi-family properties can qualify for Home Comfort services if 75% of the tenants in their building have incomes at or below 150% of the FPIG. PGW proposes to spend \$120,048 annually on LIME, with discretion to spend up to \$140,000 in a year if the Home Comfort budget does not exceed \$7,988,818. Proposed 2023 USECP at 18-19.

The Proposed 2023 USECP states that LIME will target buildings that have received Section 8 housing vouchers or Low-Income Housing Tax Credits. Proposed 2023 USECP at 35. However, PGW does not clarify what types of forms or contracts are provided to multi-family property owners and occupants or the type of measures installed.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to provide additional details about its LIME pilot program, including forms or contracts provided to the property owners and occupants and the types of measures installed.

b. Health & Safety Pilot

PGW proposes to continue its Health and Safety pilot program that it started in 2018. This pilot program targets the highest usage homes and allows contractors to spend up to \$3,000 per-project for health and safety measures in a residence to address conditions that prohibit cost-effective weatherization. CSPs must project energy savings of at least 15% for a residence to qualify for this increased health and safety allowance. PGW will pre-screen all residences selected for this pilot, and the total amount spent on measures for this pilot shall not exceed \$100,000 per year.²⁸ Proposed 2023 USECP at 21-22.

Clarification Required: We are not currently requiring any clarifications to this aspect of the Proposed 2023 USECP.

c. Repair and Renew Pilot Program

PGW proposes to implement a Repair and Renew pilot program to provide LIURP benefits to households that have received a hazard tag from a PGW service representative indicating a heating system component is not operating safely or at all. Proposed 2023 USECP at 22.

To be eligible for the Repair and Renew pilot, a customer must:

²⁸ As part of PGW's amendments to its 2017 USECP, which was approved through the March 2020 Order, the maximum amount per job for the Health and Safety pilot program increased from \$2,000 to \$3,000. Matters related to the now-vacated March 2020 Order remain in place at least until the OALJ proceeding is completed.

- Have been enrolled in CRP, received a LIHEAP grant, or been on a Level 1 (150% of FPIG and below), or Level 2 (151%-200% FPIG) payment arrangement in the current or prior “fiscal year”; and
- Have received a hazard tag from a PGW service representative indicating a heating system component is not operating safely or at all.

Proposed 2023 USECP at 22.

Consumers whose gas service is off will be eligible for the Repair and Renew Pilot, provided that the consumer first reinstates natural gas service in accordance with otherwise applicable requirements, including but not limited to payment of arrears. To assist this group of consumers with reinstatement of service, PGW will consider more flexible reinstatement terms including but not limited to enrollment in CRP if the household would otherwise be eligible for CRP enrollment. Proposed 2023 USECP at 22.

This pilot program will be available to both owners and tenants (with landlord consent), and the scope will include work needed to allow for proper operation of a heater and/or water heater, as applicable. PGW proposes to allocate \$250,000 of its LIURP budget for potential use in this program and related weatherization. Proposed 2023 USECP at 4.

Prioritization and evaluation of Repair and Renew services will be conducted in the following sequence:

- Eligible customers will be selected for this pilot on a monthly basis based on PGW hazard tags issued in the prior month, prioritized for treatment by highest

usage and lowest arrearages, from October through April or until funds are exhausted.

- Eligible customers who are selected will be notified by letter and called on two separate occasions (one call during the day and one in the evening) to be invited to participate in the program.
- A CSP will evaluate the heating or hot water heating hazard. If the project can be treated cost-effectively, the CSP will complete the treatment and include all costs in the cost-effectiveness analysis.
- If the heating system repair or replacement is not cost effective, the measure costs can be excluded from the project cost effective analysis, if the measure is not cost effective after applying the cost exclusions, the measure will not be installed.

Proposed 2023 USECP at 22-23.

The Proposed 2023 USECP does not specify the time period for PGW's fiscal year or explain the process for a PGW representative to issue a hazard tag to a customer. It is also unclear:

- How PGW determines high usage for customers whose gas service is off or for customers whose gas heating system has been inoperable over a specified period of time.
- How each project is determined to be cost-effective based on the information provided in the Proposed 2023 USECP.

- How the costs to repair or replace a heating system are determined ineffective, resulting in the measure not being installed if costs exceed the maximum limits (*i.e.*, average LIURP costs in 2020).

Clarification Required: Accordingly, in its response to this Order, PGW is directed to (1) provide the dates covering its “fiscal year;” (2) explain the reasons why a PGW representative would issue a hazard tag; (3) clarify how it determines high usage for customers whose natural gas service is off or whose heating system is inoperable over a specified period; and (4) clarify how a Repair and Renew job would be determined to be cost-effective or not cost-effective by providing step-by-step examples using PGW’s cost-effectiveness analysis.

d. Quality Control and Contractor Requirements

The Proposed 2023 USECP states that it uses three independent conservation service providers (each a CSP) to provide services. Home Comfort work is inspected and audited by an independent party for completeness and quality assurance. Each CSP is evaluated semi-annually based on total natural gas savings, cost-effectiveness, work quality and customer service metrics. The evaluations inform funding allocations for each CSP, which reward the best performers. Proposed 2023 USECP at 18. However, the Proposed 2023 USECP does not include any details regarding contractor training and certification requirements or quality control protocols, such as the number or percentage of jobs inspected post-installation of measures.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to provide details of its contractor training and certification requirements. PGW is also directed to provide details on its Home Comfort quality control protocols such as the number or percentage of Home Comfort jobs inspected post-installation of measures and how these inspections are selected, if applicable.

e. Home Comfort Eligibility

LIURP regulations allow a public utility to use up to 20% of the LIURP budget for special needs customers with incomes in the 151%-200% tier of the FPIG. Special needs customers, as defined in 52 Pa. Code § 58.2, include non-CAP customers who otherwise meet the LIURP eligibility requirements. The Commission has also permitted the term “special needs” to apply to seniors, customers with medical needs or disabilities, and/or customers with young children in the home.²⁹

The Proposed 2023 USECP states that Home Comfort is available to households known to be low income by having: (i) been on CRP over the prior 24 months; (ii) received a LIHEAP, CRISIS or UESF (*i.e.*, hardship fund) grant over the past 24 months; or (iii) been on a Level 1 payment arrangement over the prior 24 months. Proposed 2023 USECP at 19.

The Proposed 2023 USECP does not make it clear if customers with incomes in the 151%-200% tier of the FPIG are eligible for Home Comfort. Further, the Proposed 2023 USECP does not describe PGW’s guidelines for using up to 20% of the Home Comfort budget for special needs customers or describe how PGW’s defines “special needs.”

Clarification Required: We recognize that LIURP regulations do not mandate a public utility to service special needs customers with incomes in the 151%-200% tier of the FPIG. PGW’s Proposed 2023 USECP is silent as to whether customers with special needs in this FPIG tier are eligible for Home Comfort measures or services. If such customers are eligible for Home Comfort, the 2023 USECP must define eligibility

²⁹ See NFG 2017-2020 USECP Order, Docket No. M-2016-2573847 (order entered on March 1, 2018), at 40.

criteria for this customer base. Accordingly, in its response to this Order, PGW is directed to provide its guidelines, if any, for using up to 20% of the Home Comfort budget on special needs customers with incomes in the 151%-200% tier of the FPIG and to clarify its definition for the term “special needs” in regard to LIURP eligibility. PGW is also directed to identify the current number of known and the number of projected special needs customers with income in the 151%-200% tier of the FPIG that would otherwise qualify for Home Comfort.

f. Define Single-family & Multi-family Properties

The Proposed 2023 USECP states that Home Comfort provides in-home weatherization and energy conservation education to eligible single-family low-income customers and multi-family properties (pursuant to the LIME pilot program). Proposed 2023 USECP at 18. The Proposed 2023 USECP identifies the terms “single-family” and “multi-family” as the types of properties eligible for Home Comfort services. Proposed 2023 USECP at 34-35. However, it is unclear how PGW defines “single-family” and “multi-family” based on the physical characteristics within a single structural unit.

Clarification Required: Accordingly, in response to this Order, PGW is directed to define the terms “single-family” and “multi-family” properties as it relates to Home Comfort, including identifying the number of housing units within a single structure.

g. Landlord Approval Process

As part of its 2020 Base Rate Case, PGW has agreed to mail two letters to landlords to obtain approval to perform LIURP services for a tenant. If a telephone number is available, one of the letters will be replaced with a telephone call to the landlord. 2020 Rate Case Settlement at 13, ¶33 (e).

Under LIURP regulations at 52 Pa. Code § 58.8, prior to the installation of usage reduction measures in rental property, written landlord permission is required for the installation of the program measures. Additionally, the landlord must agree, in writing, that rents will not be raised unless the increase is related to matters other than the installation of the usage reduction measures.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to provide a copy of the letter used to verify landlord approval to perform LIURP services for a tenant. PGW is also directed to explain what the landlord is told during the telephone call to obtain approval and how the landlord's consent is recorded.

h. Usage Requirement: Coordinating LIURP services

The Proposed 2023 USECP states that PGW coordinates with other agencies to qualify customers for LIURP that are in the top 50% usage tier who have received health and safety treatments performed by coordinating nonprofit and public agencies that were not assigned to Home Comfort through the automatic assignment process. Proposed 2023 USECP at 20. PGW partners with PECO's LEEP (Low Income Energy Efficiency Program),³⁰ to coordinate services between the programs. Proposed 2023 USECP at 41. However, the Proposed 2023 USECP does not clarify if it waives its minimum usage requirement when coordinating LIURP services with another public utility's LIURP, Act 129 program, or the Department of Community and Economic Development's (DCED's) Weatherization Assistance Program (WAP). The Commission has previously approved public utilities proposals to waive minimum usage requirements for LIURP jobs coordinated with WAP or another public utility's LIURP.³¹

³⁰ LEEP is PECO's Act 129 program that offers customers electric energy conservation measures.

³¹ See FirstEnergy 2019-2021 USECP, Docket Nos. M-2017-2636969, M-2017-2636973, M-2017-2636976, and M-2017-2636978 (filed on June 24, 2019), at 19. See also PPL 2017-2019 USECP Order, Docket No. M-2016-2554787 (order entered on October 5, 2017), at 45-46.

Clarification Required: Accordingly, in its response to this Order, PGW is directed to clarify if it waives the minimum usage requirement when coordinating LIURP services with WAP or other public utility LIURPs. If the minimum usage requirement is waived only for some coordinated jobs, PGW is directed to explain how the waiver is determined and documented on a case-by-case basis.

i. Routine Health & Safety measures and Incidental Repairs

The Proposed 2023 USECP states that Home Comfort treatment begins with an initial assessment where customers are educated on ways to reduce energy use, provided basic health and safety information, and low-cost energy saving measures. If health and safety issues like mold, asbestos, roof leaks, or pests exist and cannot be corrected cost-effectively by the CSP, the home is provided with only low-cost energy savings measures (*e.g.*, low-flow devices, programmable and WiFi-enabled thermostats, water heater tank turn-downs). Proposed 2023 USECP at 20.

However, the Proposed 2023 USECP does not clarify if CSPs are provided an allowance to address routine health and safety situations that can be corrected cost-effectively to allow the installation of full-cost heating measures. It is also unclear if CSPs are provided an allowance for performing incidental repairs (*i.e.*, repairs that would allow Home Comfort measures to function properly or more efficiently).

The Commission has previously encouraged public utilities to develop an allowance for the installation of health and safety measures, such as smoke detectors and carbon monoxide alarms, to potentially remedy disqualification of full-cost heating measures. The Commission has also requested public utilities to identify their

recommended parameters for performing incidental repairs (*i.e.*, repairs that would allow LIURP measures to function properly or more efficiently).³²

Clarification Required: Accordingly, in its response to this Order, PGW is directed to explain its parameters and allowance thresholds for performing routine health and safety measures and incidental repairs.

j. Re-Weatherization Eligibility

The Proposed 2023 USECP states that Home Comfort is available to eligible customers that have not received LIURP weatherization services over the previous seven years. Proposed 2023 USECP at 19. We are concerned that this provision may make high-usage households ineligible for Home Comfort if they have received low-cost or limited program measures in the past. Time-limits on LIURP services are often tied to payback periods for LIURP measures (*i.e.*, the energy savings from LIURP work should exceed the cost of the installed measures over a certain timeframe). Some households are thus disqualified for LIURP if their premises received weatherization services within a certain number of years. Even if a high-usage household becomes eligible for LIURP after this timeframe, the energy audit may reveal that there are only a limited number of additional, cost-effective energy efficiency measures that can be considered because the cheaper measures have been previously installed.

We have encouraged public utilities to use flexibility in regard to payback periods when determining appropriate measures indicated by a comprehensive energy audit, provided that the overall job is still cost-effective. The Commission has supported installing all appropriate measures to ensure that potential energy savings is maximized

³² See, *e.g.*, PECO 2016-2018 USECP Order, Docket No. M-2015-2507139 (order entered on August 11, 2016), at 48-50, and NFG 2017-2020 USECP Order, Docket No. M-2016-2573847 (order entered on March 1, 2018), at 41-43.

on each job, particularly for “heating” jobs, to reduce the need for multiple treatments to that home over time.³³

Clarification Required: Accordingly, in its response to this Order, PGW is directed to clarify if it allows for any exceptions, if warranted, to its current seven-year limit between Home Comfort services on a premises.

k. Continuation of Regulatory Waivers

The Commission initially granted PGW waivers of the Commission’s Regulations, 52 Pa. Code §§ 58.5 & 58.11(a) (relating to administrative costs; energy survey), in PGW’s 2016 Demand Side Management (DSM) proceeding when the Home Comfort program was part of a portfolio of PGW’s DSM programs.³⁴ Subsequently, the Commission found sufficient reason to grant PGW’s request to continue waivers of 52 Pa. Code §§ 58.5 & 58.11(a) in the 2017 USECP proceeding consistent with the DSM proceeding.³⁵ PGW requests a continuation of waivers under the LIURP regulations of 52 Pa. Code §§ 58.5 and 58.11(a) through the end of the 2023 USECP. Proposed 2023 USECP at 21.

Section 58.5 applies to the amount of the LIURP budget that may be spent on administrative costs. 52 Pa. Code § 58.5. PGW was granted a waiver of this regulation for LIURP administrative cost limitations for budget years 2018, 2019 and 2020. August 2017 Order at 81. This allowed PGW to develop and implement appropriate marketing, outreach, and internal procedures to effectively promote, identify, and screen

³³ See FirstEnergy 2015-2018 USECP Order, Docket Nos. M-2014-2407728, M-2014-2407729, M-2014-2407730, and M-2014-2407731 (order entered on May 19, 2015), at 46.

³⁴ See *Petition of PGW for Approval of Demand-Side Management Plan for FY 2016-2020*, Docket No. P-2014-2459362 (order entered on November 1, 2016).

³⁵ See PGW 2017-2020 USECP Order, Docket No. M-2016-2542415 (order entered on August 3, 2017), at 50-51 and 79-81.

all the newly eligible non-CRP customers and other low-income customers for Home Comfort.

Section 58.11(a) relates to the LIURP energy survey and the installation of program measures.³⁶ 52 Pa. Code § 58.11(a). The waivers of these regulations allowed PGW to use a cost/benefit calculation to ascertain “cost-effectiveness to determine what measures to include in a project” rather than the 7 or 12-year simple payback criteria. The Commission granted this waiver relative to PGW’s Health and Safety Pilot and Home Comfort, limited to the duration of its 2017 USECP, and did not excuse PGW from complying with the rest of its obligations in Section 58.11. August 2017 Order at 51.

Clarification Required: Accordingly, in response to this Order, PGW is directed to clarify why waivers for Section 58.5 and 58.11(a) are still necessary. We remind PGW that waivers are generally granted narrowly and only for a finite term.

3. CARES

PGW’s CARES program will continue to help customers with special circumstances (*e.g.*, unemployment, family emergencies, and age-related issues) by providing referrals to internal and external organizations or programs for assistance.

³⁶ Section 58.11 provides that:

- (a) If an applicant is eligible to receive program services, an onsite energy survey shall be performed to determine if the installation of program measures would be appropriate. The installation of a program measure is considered appropriate if it is not already present and performing effectively and when the energy savings derived from the installation will result in a simple payback of 7 years or less. A 12-year simple payback criterion shall be utilized for the installation of side wall insulation, attic insulation, space heating system replacement, water heater replacements and refrigerator replacement when the expected lifetime of the measure exceeds the payback period.
- (b) Program funds may not be used for measures that involve fuel switching between Commission regulated utilities. This stipulation does not apply to fuel switching within a dual-fuel utility.

CARES also includes outreach activities related to LIHEAP and Crisis grants, since those grants target many of the same customers who are low-income and seek assistance with paying their utility bills. The CARES program consists of two components: “quick-fix” and case management. Quick-fix cases involve referral-only services to help customers resolve issues affecting their ability to pay their natural gas bill. The case management component goes further by providing follow-up services and ongoing monitoring of the customer’s situation. CARES services are available to any customers with (1) income at or below 150% of the FPIG who are having trouble paying their bills, (2) a personal crisis that is likely to lead to a financial crisis, or (3) a valid protection from abuse (PFA) order. Proposed 2023 USECP at 23-25.

Clarification Required: PGW’s CARES program appears to provide the outreach and casework approach necessary to help customers secure energy assistance funds and other needed services as described in 52 Pa. Code §62.2. Accordingly, we are not currently requiring any clarifications or proposing any changes to this aspect of the Proposed 2023 USECP.

4. Hardship Fund

PGW administers its Hardship Fund program in partnership with UESF to provide financial assistance to eligible customers whose service is terminated or in termination status. PGW contributes up to \$750 to match a UESF grant via a bill credit to help resolve a heating emergency. The combination of the PGW matching credit and the UESF grant cannot exceed \$1,500 and must eliminate all debt, not including a CRP customer’s PPA balance. Proposed 2023 USECP at 26-27.

To qualify for PGW’s Hardship Fund, a customer’s service must be off or be under threat of termination. Further, the customer must not have received a UESF grant within the past two years, must have applied for LIHEAP Cash and Crisis grants (if

available), and must have a gross household income at or below 175% of the FPIG. PGW anticipates contributing \$620,846 annually to Hardship Fund grants for 2023-2027. Proposed 2023 USECP at 26-27.

Pilot Hardship Fund Program

PGW is proposing a Pilot Hardship Fund program to assist customers that would typically not be eligible for a hardship fund grant. The Pilot Hardship Fund offers the same benefits of the traditional Hardship Fund but with reduced grant amounts, between \$200 and \$750, depending on the customer's account arrears. Customers that meet the following criteria will be eligible for an automatic grant from the Pilot Hardship Fund program:

- Have incomes at or below 250% of the FPIG; and
- Have been removed from CRP during the recertification process for exceeding the income eligibility limits; or
- Obtained a PFA or a court order indicating clear evidence of domestic violence against the applicant or customer.

Proposed 2023 USECP at 27-28.

Grants will be distributed on a first-come, first-served basis until funds are exhausted. Grants awarded under this pilot program will work as if they were a PGW matching grant in the traditional hardship fund program. Customers can only receive one pilot grant per year. Proposed 2023 USECP at 28.

PGW estimates that up to 1,000 customers per year could meet eligibility for the Hardship Pilot program. The proposed budget of the pilot is \$100,000. PGW estimates this would provide enough funding to provide grants to approximately 133 to 500 customers. With the funding coming from the unused matching grants from the regular Hardship Fund, not to exceed \$100,000, PGW intends to run this Pilot program for two years. Proposed 2023 USECP at 27-28.

Clarification Required: PGW states that it will offer “automatic” grants to eligible customers. However, it does not specify how these customers will be selected (*i.e.*, whether the customer must request a grant or whether the grant is issued without any action taken by the customer). If customers must request the grant, PGW should explain how they will be informed and educated about the program. If the grant is issued without customer action, PGW should explain how these customers will be selected and informed about the grant. PGW must also clarify who will administer the Pilot Hardship Fund program (*i.e.*, UESF, PGW, or another organization).

C. Projected Needs Assessments

In compliance with 52 Pa. Code § 62.4(b)(3), the Proposed 2023 USECP includes a needs assessment for PGW’s universal service programs, which is depicted in Table 2 below.

**Table 2
Needs Assessment**

| | |
|---|---------------|
| 1. Estimated number of low-income customers | See below |
| 2. Confirmed number of low-income customers | 67,986 |
| 3. Identified number of payment-troubled, low-income customers | 38,342 |
| 4. Estimated number of currently eligible Home Comfort participants | 44,168 |
| 5. Cost to serve customers needing Home Comfort | \$131,191,720 |

Source: Proposed 2023 USECP at 34.

Table 2 reflects needs assessment information provided on page 34 of the Proposed 2023 USECP. Page 10, however, includes a needs assessment with a different number of estimated low-income heat customers (121,496). On page 34, PGW identifies 197,855 estimated low-income customers in its service territory based on the 2019 Report Universal Service and Energy Conservation Performance³⁷ and then 137, 806 “current” estimated low-income customers based on Census data. Based on these varying figures, it is not clear what PGW estimates is the approximate number of low-income customers in its service territory when determining need for its universal service programs.

Clarification Requested: Accordingly, in response to this Order, PGW is directed to identify the precise sources for the conflicting numbers of estimated low-income customers and identify which number reflects the more accurate count of estimated low-income customers in its service territory.

D. Projected Enrollment Levels

PGW’s projected enrollment levels from 2023 through 2027 are as shown in Table 3 below.

**Table 3
Projected Enrollment Levels**

| Program | 2023 | 2024 | 2025 | 2026 | 2027 |
|-----------------------|-------------|-------------|-------------|-------------|-------------|
| CAP (CRP) | 65,429 | 68,381 | 71,334 | 74,286 | 77,238 |
| LIURP (Home Comfort)* | 2,561 | 2,561 | 2,561 | 2,561 | 2,561 |
| CARES** | 2,020 | 2,020 | 2,020 | 2,020 | 2,020 |
| Hardship Fund | 1,184 | 1,184 | 1,184 | 1,184 | 1,184 |

Source: Proposed 2023 USECP at 17, 21, 25, 27, and 29.

³⁷ 2019 Report Universal Service and Energy Conservation Performance at 7.
https://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2019.pdf

* PGW projects that it will also serve 2 multifamily units per year in the LIME pilot program and also complete 36 projects per year in the Repair and Renew pilot program through 2027.
 ** The estimated number of customers served through the CARES program includes ongoing case management and “quick fix” (referral only) cases.

Clarification Required: We are not currently requiring any clarifications to this aspect of the Proposed 2023 USECP.

E. Program Budgets

Table 4 below shows the proposed budget levels for 2023-2027.

**Table 4
 Projected Budgets and Spending**

| Universal Service Component | 2023 | 2024 | 2025 | 2026 | 2027 |
|------------------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| CRP | \$69,139,959 | \$72,187,032 | \$75,234,632 | \$78,282,210 | \$81,329,284 |
| Home Comfort* | \$7,988,818 | \$7,988,818 | \$7,988,818 | \$7,988,818 | \$7,988,818 |
| CARES | \$947,550 | \$947,550 | \$947,550 | \$947,550 | \$947,550 |
| Hardship Fund** | \$1,055,649 | \$1,055,649 | \$1,055,649 | \$1,055,649 | \$1,055,649 |
| Total | \$79,131,976 | \$82,179,049 | \$85,226,649 | \$88,274,227 | \$91,321,301 |

Source: Proposed 2023 USECP at 17, 21, 25, 27, and 29.

* Includes programmatic/administrative costs (including labor) and costs for the LIME pilot at \$120,048 per year. Proposed 2023 USECP at 21.

** Only the administrative cost of \$260,149 and utility contributions of \$795,500 are recovered in base rates and is counted in the Hardship Fund total. Voluntary donations by customers and the UESF funds are not recovered in base rates.

All the costs above are recovered from PGW ratepayers. However, only CRP and Home Comfort Costs are recovered through PGW’s Universal Service rider. In 2020, PGW recouped 73.8% of CRP and LIURP costs from residential ratepayers, 21.4% from commercial ratepayers, 1.7% from industrial ratepayers, 2.0% from municipal ratepayers, and 1.1% from the Philadelphia Housing Authority (PHA). 2020 Report on Universal Service Programs & Collections Performance at 87 & 88.

Table 5 below reflects projected CRP and Home Comfort costs recovered from residential ratepayers based on the percentages described above.

Table 5
Projected CRP and Home Comfort Costs Recovered from Residential Ratepayers

| Universal Service Component | 2023 | 2024 | 2025 | 2026 | 2027 |
|--|--------------|--------------|--------------|--------------|--------------|
| CRP | \$51,025,290 | \$53,274,030 | \$55,523,158 | \$57,772,271 | \$60,021,012 |
| Home Comfort | \$5,895,748 | \$5,895,748 | \$5,895,748 | \$5,895,748 | \$5,895,748 |
| Total | \$56,921,037 | \$59,169,777 | \$61,418,906 | \$63,668,019 | \$65,916,759 |
| Average Monthly Cost Recovered per Residential Customer* | \$9.74 | \$10.13 | \$10.51 | \$10.90 | \$11.28 |

*Based on 486,934 residential customers, as reported by PGW as of December 31, 2020. *2020 Report on Universal Service Programs & Collections Performance* at 5.

We do not have the average number of 2020 accounts for PGW’s other rate classes, so a similar cost recovery projection could not be conducted for existing commercial, industrial, municipal, and PHA accounts.

Clarification Required: In its response to this Order, PGW is directed to provide the average number of residential, commercial, industrial, municipal, and PHA accounts served in 2021.

F. Use of Community-Based Organizations (CBOs)

The Natural Gas Choice and Competition Act directs the Commission to “encourage the use of [CBOs] that have the necessary technical and administrative experience to be the direct providers of services or programs which reduce energy consumption or otherwise assist low-income retail gas customers to afford natural gas service.” 66 Pa. C.S. § 2203(8). PGW utilizes community agencies throughout the utility’s service territory as referral agencies or contractors in the CRP, CARES, and

Hardship Fund programs. PGW's CARES program coordinates with Neighborhood Energy Centers and UESF intake sites³⁸ to help customers resolve payment issues. PGW uses other social service agencies as needed based on the customer's situation. Proposed 2023 USECP at 30-31.

Clarification Required: We are not currently requiring any clarifications to this aspect of the Proposed 2023 USECP.

G. Organizational Structure

The internal organizational structure for PGW's universal service programs includes one Vice President of Regulatory Compliance and Consumer Programs, one Director of Regulatory Compliance and one Manager of Customer Programs, one Manager of Universal Services and one Manager of Energy Efficiency and Emerging Customer Programs. One Supervisor of Universal Services, one Analyst of Energy Efficiency and Emerging Customer Programs, as well as Universal Service Representatives and Customer Service Representatives. Proposed 2023 USECP at 31.

Clarification Required: We are not currently requiring any clarifications to this aspect of the Proposed 2023 USECP.

IV. CONCLUSION

This Order recognizes that significant elements of the Proposed 2023 USECP will depend on the resolution of the matter currently pending before the OALJ. This Order sets forth some aspects that PGW will need to address prior to our review of its Proposed

³⁸ A full listing of UESF intake sites and Neighborhood Energy Centers is provided in Appendices C and D of the Proposed 2023 USECP. Proposed 2023 USECP at 39-40.

2023 USECP. This Order also calls for additional information from PGW and allows for comments and reply comments from stakeholders. Additional aspects and questions may develop relative to matters addressed herein based upon the outcome of the OALJ proceeding.

PGW's responses and supplemental information must be filed and served within twenty days of the entry date of this Order. To the extent that PGW has responsive proposals for additional relief or universal service provisions, those proposals, along with timelines and cost estimates, should be described in the response to afford other parties the opportunity to comment and reply.

Comments are due twenty days after PGW's response and supplemental information filing deadline, and reply comments are due fifteen days thereafter. Parties are welcome to address proposals in the Proposed 2023 USECP and provisions carried over from the current USECP even if we have not raised questions herein. If the comments and reply comments raise relevant material factual issues, we may refer this matter, in whole or in part, to the OALJ for hearing and decision. **THEREFORE, IT IS ORDERED:**

1. That approval of the proposed Universal Service and Energy Conservation Plan as filed by Philadelphia Gas Works on October 30, 2021, is withheld pending Commission review of the requested supplemental information, stakeholder comments, and reply comments, as set forth in this Order.

2. That a copy of this Order be served on Philadelphia Gas Works, the Office of the Consumer Advocate, the Office of Small Business Advocate, the Bureau of Investigation and Enforcement, and the Pennsylvania Utility Law Project.

3. That the Philadelphia Gas Works shall file and serve the supplemental information required herein within twenty days of the entry date of this order.

4. That comments to this Order shall be filed within twenty days after the filing deadline for the supplemental information. Reply comments shall be filed within fifteen days thereafter.

5. That the supplemental information, comments, and reply comments must be filed electronically through the Commission's e-filing system.³⁹

6. That an electronic copy, in WORD[®] or WORD[®]-compatible format, of all filed submissions, comments, and reply comments be provided to Norma Bowman, Bureau of Consumer Services, nobowman@pa.gov; Christina Chase-Pettis, Office of Communications, cchasepett@pa.gov; Erin Tate, Law Bureau, etate@pa.gov; Rhonda L. Daviston, Law Bureau, rdaviston@pa.gov; and Louise Fink Smith, Law Bureau, finksmith@pa.gov.

³⁹ <https://www.puc.pa.gov/efiling/default.aspx>

7. That the contact person for this Order is Norma Bowman, Bureau of Consumer Services, 717-705-0621, nobowman@pa.gov.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta

Secretary

(SEAL)

ORDER ADOPTED: June 16, 2022

ORDER ENTERED: June 16, 2022