



**VIA ELECTRONIC MAIL**

July 20, 2022

Rosemary Chiavetta  
Secretary PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: M-2018-3003177 – Peoples Natural Gas Company 2019-2024 USECP  
M-2020-3021343 – Peoples Gas Company 2019-2024 USECP  
P-2020-3017641 – Amendment to Peoples Natural Gas Company 2015-2018 USECP  
M-2014-2432515 – Peoples Natural Gas

Dear Secretary Chiavetta:

On behalf of the Peoples Natural Gas Company LLC and Peoples Gas Company LLC (“Peoples”), enclosed for filing please find the Petition for Reconsideration from Action of the Staff related to the Commission Order dated June 7, 2022 and the Executive Secretary Letter dated June 30<sup>th</sup> in the above-noted dockets.

Please contact me at (412) 208-6834 should you have any questions or concerns regarding this matter.

Sincerely,

Jennifer L. Petrisek  
Sr. Counsel

Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

### VIA ELECTRONIC MAIL:

Christy Appleby, Assistant Consumer Advocate  
Patrick Cicero, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
**Email Address:** [CApplby@paoca.org](mailto:CApplby@paoca.org)  
[PCicero@paoca.org](mailto:PCicero@paoca.org)

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

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

Elizabeth R. Marx, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
**Email Address:** [emarxPULP@palegalaid.net](mailto:emarxPULP@palegalaid.net)

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

Joseph Magee, Supervisor  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105  
**Email Address:** [jmagee@pa.gov](mailto:jmagee@pa.gov)

Louise Fink Smith, Esq.  
Pennsylvania Public Utility Commission  
Law Bureau  
P.O. Box 3265  
Harrisburg, PA 17105  
**Email Address:** [finksmith@pa.gov](mailto:finksmith@pa.gov)



---

Jennifer L. Petrisek

Dated this 20<sup>th</sup> day of July, 2022.

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024	M-2018-3003177
Peoples Gas Company LLC Universal and Energy Conservation Plan for 2019-2024	M-2020-3021342
Amendment to Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015- 2018	P-2020-3017641
Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2015-2018	M-2014-2432515

**PETITION OF PEOPLES NATURAL GAS COMPANY LLC AND PEOPLES GAS COMPANY  
LLC FOR RECONSIDERATION OF STAFF ACTION**

Peoples Natural Gas Company LLC and Peoples Gas Company LLC (collectively “Peoples” or the “Company”), pursuant to Section 5.44 of the Pennsylvania Public Utility Commission's (“Commission”) regulations hereby files this Petition requesting reconsideration of the recommendations of the Bureau of Consumer Affairs related to the Company’s Compliance Plan filed in response to the Commission Order dated May 12, 2022 (the “USECP Order”) in the above-noted dockets.

**I. BACKGROUND**

1. Peoples filed a Proposed 2019 Universal and Energy Conservations Plan (“USECP”) on July 2, 2018 that encompassed programs for both Peoples Natural Gas Company LLC (“PNGC”) and Peoples Gas Company LLC (“PGC”). Initially, the proposed USECP was assigned only docket number M-2018-3003177 for PNGC. Thereafter, in recognition that PNGC and PGC are separate jurisdictional utilities with unique utility codes, PGC’s voluntary participation in the USECP was assigned Docket No. M-2020-3021343.
2. On January 6, 2020, the Peoples filed an Addendum (January 2020 Addendum) at Docket No. M-2020-3003177 proposing to amend the proposed USECP to incorporate recommended changes discussed in the Final CAP Policy Statement and Order.

3. After stakeholder meetings, Peoples filed additional amendments to the USECP on April 24, 2020, and May 8, 2020.
4. On August 27, 2020, the Commission entered a Tentative Order identifying issues in the USECP requiring further clarification and withholding approval of the USECP until a review of requested information and stakeholder comments was completed and requested that the Peoples submit supplemental information regarding the USECP.
5. On September 17, 2020, Peoples filed the requested Supplemental Information.
6. On September 22, 2020, the Office of Consumer Affairs “(OCA)” filed a Notice of Intervention and Public Statement at Docket No. M-2018-3003177.
7. On October 5, 2020, Peoples filed proposed revisions to the USECP at Docket Nos. M-2018-3003177 and M-2020-3021343 to clarify the status of the CAP customer information sharing agreement with Duquesne Light Company. CAUSE-PA filed comments on October 20, 2020 and OCA filed comments on October 21, 2020. CAUSE-PA and OCA individually filed reply comments on November 4, 2020.
8. On May 12, the Commission entered an Order directing Peoples to submit a revised 2019-2024 Universal Service and Energy Conservation Plan (2019 USECP) within 30 days reflecting changes directed in the Order (the “May 12 Order”). The Commission approved the 2019 USECP conditioned upon the Peoples Companies making the changes directed in the May 12 Order.
9. On June 13, 2022, Peoples filed clean and redlined versions of the revised 2019 USECP (June 13 Compliance Filing).
10. On June 30, 2022, the Commission issued a Secretarial Letter identifying three areas of the revised 2019 USECP that were inconsistent with the May 12 Order, as identified by the Bureau of Consumer Services.
11. The June 30, 2022 Secretarial Letter advised that parties may seek reconsideration of the staff action pursuant to Section 5.44 of the Pennsylvania Public Utility Commission's ("Commission") regulations.

## **II. DISCUSSION**

### **(A) CAP Paper Application**

12. The May 12 Order required that Peoples amend the USECP to permit customers eligible for CAP and E-CAP to apply via a paper application. Section (B)(1)(p), page 59, of the May 12 Order

directed that Peoples reinstate or develop a paper application within six (6) months of final approval of the USECP:

Accordingly, we direct that within six months of final approval of their 2019 USECP the Peoples Companies reinstate or develop a paper application for their CAP and to consult with their USAG on how this application should be distributed. The Peoples Companies shall note this change and timeline in their Revised 2019 USECP.

13. In the June 13 Compliance Plan, Peoples advised that a paper application would be implemented by October 1, 2022, which is within the six (6) month timeframe identified by the May 12 Order.
14. By way of clarification, Peoples submits that it must work with its CAP administrator, Dollar Energy Fund, to develop a paper application and develop internal processes to support a paper application option as this form of application has not previously been utilized.
15. The process to implement the paper application requires, amongst other matters: (1) identifying the pathways for customers to obtain a paper application such as through the Peoples call center, Dollar Energy Fund's call center and the Peoples website, (2) ensuring that the paper application and the cover letter or instruction sheet are developed using Plain Language best practices, and (3) discussion with key stakeholders in the Universal Service Advisory Group in order to gain feedback on how best to launch this additional application method. The next quarterly Advisory Group meeting is to be held in late July where this issue will be discussed.
16. Peoples will use the feedback gained from the Advisory Group, Dollar Energy Fund and internal stakeholders to develop the process and form of the application in order to support full implementation by October 1, 2022.
17. Peoples requests clarification that any implementation of the paper application by October 1, 2022 is acceptable to BCS and within the requirements identified in the May 12 Order.

**(B) CAP Final Bill**

18. The May 12 Order required that Peoples amend the USECP to charge CAP and E-CAP customers no more than their prorated CAP or E-CAP billing amount for usage incurred during their final billing period. If the final bill includes remaining unforgiven PPA, that amount must be separately identified on the final bill. This change was directed to be implemented within 90 days after final approval of the USECP.

19. In the June 13 Compliance Plan, Peoples advised that the implementation of the CAP Final Billing would occur by March 31, 2023, approximately 7 months after the required date.
20. The CAP Final Bill Change included in the May 12 Order requires significant changes to the Company's internal customer information and billing system. In addition to changing the calculation of the final bill, changes must also be made to bill presentment formats.
21. In its original compliance filing, the Company proposed implementing the CAP final bill changes by the end of the first quarter of 2023. The Company has engaged its IT team to further consider the system modifications needed to implement this change in an effort to accelerate this process. By adding additional IT resources to this project, the Company has modified the planned implementation date to December 1, 2022. Moving this change ahead of other IT projects will allow Peoples to implement this change prior to winter heating season, benefiting CAP customers who may receive final bills during the winter when usage bills are typically higher than CAP payments.
22. While this compliance timeframe is still outside of the timeframe identified in the May 12 Order, Peoples requests reconsideration of the issue by BCS and a clarification that the revised timeframe, which occurs before hearing season begins, is acceptable due to the requirements to modify the Company's internal customer information system and bill presentment formats.

**(C) Elimination of pre-CAP \$5 Co-Payment**

23. The May 12 Order approved Peoples use of the new CAP PIP energy burdens as proposed in the USECP and ordered that Peoples shall implement the following changes within 90 days of the entry o the May 12 Order: (1) charge CAP customers with incomes at or below 150% of the FPIG a maximum of 4%, 5%, or 6% of income (based on income tier) or their average bill, whichever is less, (2) eliminate the \$5 PPA co-pay for all CAP and E-CAP customers, and (3) eliminate the CAP Plus charge for all CAP and E-CAP customers.
24. In the June 13 Compliance Plan, Peoples advised that the implementation of the elimination of the pre-CAP \$5 co-payment would occur by March 31, 2023, approximately 7 months after the required date.
25. The elimination of the pre-CAP copayment requires significant changes to the Company's internal billing system, along with significant testing that must occur to ensure the programmed changes are accurate and do not cause unintended changes to other aspects of the billing program.
26. The current CAP Arrearage Forgiveness mechanism is closely tied to the pre-CAP \$5 copayment. Implementing this change will require modifications to the Arrearage Forgiveness

process as well as changes to the CAP payment presented to customers. Peoples is continuing to review and identify the various internal billing components that must be modified in order to implement the change. Peoples recognizes the importance of a timely implementation of this program modification and is exercising due care to implement the changes as quickly as possible. If there is an opportunity to implement the change for new CAP customers, prior to the full implementation of this change for all CAP customers, the Company will first make this change.

27. While this compliance timeframe is outside of the timeframe identified in the May 12 Order, Peoples requests reconsideration of the issue by BCS and a clarification that the requested timeframe for implementation, March 31, 2023, is deemed reasonable and acceptable due to significant programming and testing requirements to modify the Company's internal billing system. If so requested by BCS or the Commission, the Company will provide routine updates regarding the implementation status through the final implementation by March 31, 2023.

### III. CONCLUSION

28. For the reasons set forth herein, Peoples respectfully requests the following actions:
- (a) clarification that the implementation of the CAP paper application by October 1, 2022 is acceptable to BCS and within the requirements identified in the May 12 Order;
  - (b) reconsideration of the revised implementation date for the CAP Final Bill, of December 1, 2022; and
  - (c) reconsideration of the implementation of the pre-CAP \$5 co-payment by March 31, 2023.

WHEREFORE, Peoples Natural Gas Company LLC and Peoples Gas Company respectfully request that the Public Utility Commission grant this Petition for Reconsideration of Staff Action.

Respectfully submitted this 20<sup>th</sup> day of July,



Jennifer L. Petrisek

Counsel for Peoples Natural Gas Company LLC & Peoples Gas Company LLC

375 North Shore Drive, Pittsburgh, PA 15212

Phone: 412-208-6834

Email: [jennifer.petrisek@peoples-gas.com](mailto:jennifer.petrisek@peoples-gas.com)

PA Attorney ID No. 83411