



**PHILADELPHIA GAS WORKS**

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July 21, 2022

**Via Electronic Filing**

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

**Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan 2023-2027,  
in Docket No. M-2021-3029323**

Dear Secretary Chiavetta:

On behalf of Philadelphia Gas Works (“PGW” or the “Company”), enclosed please find the Supplemental Information as requested in the June 16, 2022 Order Directing Supplemental Information and Establishing Comment Period in the above referenced docket. Please note that, by Secretarial Letter dated June 28, 2022, PGW received an extension of time to file these comments by July 21, 2022. Additionally, the comment and reply comment periods were extended by Secretarial Letter dated July 12, 2022, to August 30, 2022 and September 14, 2022 respectively.

If you have any questions or concerns, please contact me at

Respectfully,

/s/ Craig W. Berry  
Craig W. Berry, Esquire

Enclosure

cc: Certificate of Service w/encs.  
Lori Mohr, Bureau of Consumer Services, [laumohr@pa.gov](mailto:laumohr@pa.gov)  
Joseph McGee, Bureau of Consumer Services, [jmagee@pa.gov](mailto:jmagee@pa.gov)  
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Rhonda L. Daviston, Law Bureau, [rdaviston@pa.gov](mailto:rdaviston@pa.gov)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Supplemental USECP Information upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### Via Email Only

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Dated: July 21, 2022

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/s/ Craig W. Berry  
Craig W. Berry, Esq.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**B. 1. CRP**

**a. Income Documentation for Last 30 Days or 12 Months**

The Commission made five clarification requests regarding 1. CRP, a. Income Documentation for Last 30 Days or 12 Months, on pages 20 through 21 of the Order. PGW's responses are as follows:

***Request: 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). Response:***

**PGW Response:** PGW's CRP application requests that customers provide proof of income for the last 30 days. Customers who are unable to provide proof of income for the last 30 days and indicate that they are seasonally employed or receive fluctuating income are asked to provide income for the last 12 months. Year-to-date information, a letter from an employer, and the most recent 30-day period for which the customer received income are used to determine the monthly income amount in lieu of proof for the last 12 months. For example, this often occurs with home health aides who do not receive consistent income due to patient hospitalization.

***Request: 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)***

**PGW Response:** This policy can be applied in any month, as long as the customer has been at the same place of employment since the start of the calendar year.

***Request: 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.***

**PGW Response:** The seasonal/fluctuating income documentation policy applies to customers with intermittent income. Examples of such income are: School District of Philadelphia employees, Uber/Lyft drivers, farmworkers, landscapers and home health aides.

Part time workers are not impacted, as they are able to provide income for the last 30 days.

***Request: 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 Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**PGW Response:** Staff is advised that customers who receive fluctuating income can provide PGW with whatever proof of income they have. The income proof that is provided is often older than 30 days from receipt of the CRP application. PGW instructs staff to advise the customer that the income must be for the most recent 30 days. If the customer provides a letter from the employer explaining the reason for the missing income or "gap" in paystubs, PGW instructs staff to use the year-to-date formula to calculate the income for the customer.

***Request: 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.***

**PGW Response:** See attached for the following:

- CRP Application
- CRP Recertification Letter
- CRP Final Reminder
- 2022 CRP Flyer
- CRP Eligibility Flyer

# PGW Customer Responsibility Program (CRP) APPLICATION / RECERTIFICATION FORM

Name: \_\_\_\_\_

Account Number: \_\_\_\_\_

Please Check:
<input type="checkbox"/> New Application
<input type="checkbox"/> Recertification

Address: \_\_\_\_\_

Zip: \_\_\_\_\_ Phone: (\_\_\_\_) \_\_\_\_\_

**Household Information** (Please list all children and adults living in your home, starting with yourself)

Last Name	First Name	Relationship	Social Security #	Date of Birth	Under 18 Y/N	(FOR PGW USE ONLY) Average Gross Monthly Inc.
		Self				
(If you need to include more household members, please attach a separate sheet)					Total Average Monthly Household Income	

**IMPORTANT:** Attach copies of current income documentation for all household members listed above (e.g., all pay stubs within last 30 days, social security letter). PGW will use this documentation to calculate each household member's average gross monthly income, using year-to-date earnings, if necessary. For adults 18 and older who do not have an income, use the lines below to explain their current situation (e.g., "applied for unemployment, but not eligible", "enrolled in high school / college"). Failure to provide this information when you apply may require follow up verification, which will delay processing.

**Additional Financial Assistance** (to be completed in its entirety and signed by the person providing assistance)

If someone not living in your home provides financial assistance to you or someone else in your home, they must complete the section below and sign where noted. PGW may require verification of the information stated in this section.

Name of person providing assistance: \_\_\_\_\_ Phone: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

\_\_\_\_\_  
(Signature of person providing assistance) I certify that I provide \_\_\_\_\_/month in cash assistance to the CRP applicant listed above and I understand that PGW can request verification of this information upon request.

**Other Assistance** (Yes or No response is required)

Indicate if your household receives the following types of assistance listed below, and the amount received for each (please attach documentation, such as the DPW Letter of Eligibility or a COMPASS printout). PGW does NOT include the dollar amount of this assistance as income when determining eligibility for CRP. The purpose for obtaining this information is to reduce the need for follow-up when determining how your household meets basic living expenses.

Food Stamps  No  Yes If yes, please list amount per month \_\_\_\_\_

Housing subsidy (e.g., PHA housing, voucher)  No  Yes If yes, please list amount per month \_\_\_\_\_

**Customer Responsibilities**

1. I agree to pay PGW the monthly CRP amount and other additional charges that apply.
2. I understand that I will receive 1/36th forgiveness of pre-program arrears only in months that I pay my total amount due on time and in full.
3. I understand that if I miss one payment, I will be in default, collection activity will begin, and my service may be terminated.
4. I agree to apply for LIHEAP and list PGW as the utility company to which I want payment sent.
5. I agree to recertify each year by submitting a CRP application with updated household information and income documentation.
6. I agree to report all changes in household size and income, even if the changes occur before my required annual recertification.
7. I agree to accept the free services of PGW's conservation programs, if offered to me.
8. I agree to make a significant effort to conserve energy.
9. I hereby authorize PGW to verify information provided on this form through internal and third party sources, including City, State, and Federal records and to obtain additional information from any source for any review.
10. I agree that if I fail to meet any of the Customer Responsibilities above, PGW may remove me from the Customer Responsibility Program.

**Important Notice** PUC requirements limit enrollment in CRP to customers who meet the income eligibility. PGW uses internal and third party sources, as well as standard benefit determinations made by the Social Security Administration and the Department of Human Services, to routinely audit and assess information and documentation provided by customers who apply for CRP. If through investigation you are found to have provided false information, you will be removed from CRP and may be required to repay the discounts and forgiveness received during the period for which you were ineligible for the program. You may also be subject to criminal prosecution for fraud. By signing below, you acknowledge that you have provided complete and correct information, have read and understand this notice, and agree to the Customer Responsibilities above.

PGW Representative \_\_\_\_\_ Customer Signature \_\_\_\_\_ Date \_\_\_\_\_

# Programa de Responsabilidad del Cliente (CRP) SOLICITUD / RECERTIFICACIÓN

Nombre: \_\_\_\_\_ Número de cuenta: \_\_\_\_\_

Marque una: <input type="checkbox"/> Solicitud nueva <input type="checkbox"/> Recertificación
---

Dirección: \_\_\_\_\_ Código postal: \_\_\_\_\_ Tel: (\_\_\_\_) \_\_\_\_\_

**Integrantes de su hogar/ingresos** : (Nombre todos los niños y adultos que viven en su hogar, comenzando por usted)

Apellido	Nombre	Parentesco	Núm. de Seguro Social:	Fecha de nacimiento	Menor de 18 S/N	(Uso para PGW solamente) Ingreso bruto/mes
		Yo				
(Si necesita más espacio para otros miembros, adjunte una hoja con la información)					Ingreso total mensual del hogar	

**IMPORTANTE:** Adjunte comprobantes de los ingresos actuales en los últimos 30 días de todos los miembros indicados más arriba que reciben salario u otro tipo de ingreso (p. ej. copias de talonarios de cheque, carta del seguro social, carta de manutención de los hijos, determinación de desempleo, etc.). En el caso de los adultos mayores de 18 años que no tienen ingresos, explique en los siguientes renglones su situación actual (p. ej. "solicitó desempleo, pero no califico", "inscrito en un programa de capacitación", "inscrito en una escuela media o universidad", etc.). Si no proporciona esta información con la solicitud, puede que PGW tenga que verificarla, lo cual alargaría el proceso. \_\_\_\_\_

**Asistencia económica adicional** (la persona que proporciona la asistencia debe llenar y firmar esta sección)

Si alguien que no vive en su hogar le da asistencia económica a usted o a alguno de los integrantes de su hogar, esa persona deberá completar y firmar esta sección. Es posible que PGW requiera verificación de esta información.

Nombre de la persona que proporciona asistencia: \_\_\_\_\_ Tel: \_\_\_\_\_

Dirección: \_\_\_\_\_ Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ C.P.: \_\_\_\_\_

Yo certifico que proporciono \$ \_\_\_\_\_ /al mes al hogar del solicitante indicado arriba.

Firma \_\_\_\_\_

**Otra asistencia** (tiene que contestar Sí o No)

Indique si su hogar recibe los siguientes tipos de asistencia y la cantidad que recibe de cada uno. PGW **NO** incluye la cantidad de esta asistencia en los cálculos para determinar si califica para el programa CRP. La finalidad de obtener esta información es reducir la necesidad de seguimiento al determinar cómo paga su hogar los gastos básicos.

Cupones de alimentos  No  Sí Si sí, anote la cantidad mensual \_\_\_\_\_

Subsidio para vivienda (p. ej. Vivienda de PHA, voucher)  No  Sí Si sí, anote la cantidad mensual \_\_\_\_\_

**Responsabilidades del cliente**

1. Acepto pagarle a PGW la cantidad mensual del CRP y los cargos adicionales correspondientes.
2. Entiendo que me perdonarán 1/36 de lo que debo con anterioridad al programa únicamente en los meses en los que pague a tiempo el saldo completo de ese mes.
3. Entiendo que si no realizo un pago mi cuenta entrará en mora, se iniciarán las medidas de cobranza y mi servicio puede ser suspendido.
4. Acepto solicitar el programa LIHEAP y poner a PGW como la compañía de servicios públicos a la que deseo que envíen el pago.
5. Acepto recertificarme cada año mediante el envío de una solicitud CRP con información actualizada sobre los integrantes del hogar y comprobantes de ingresos.
6. Acepto informar de todos los cambios en el número de los integrantes del hogar y de los ingresos, incluso si los cambios ocurren antes de la recertificación anual.
7. Estoy de acuerdo en aceptar los servicios gratuitos de los programas de conservación de PGW, si me los ofrecen.
8. Acepto que haré todo lo posible por conservar energía.
9. Por medio de la presente autorizo que PGW verifique la información que proporcioné en esta solicitud a través de terceros y recursos internos, incluidos los archivos municipales, estatales, y federales y que obtenga información adicional de cualquier otra fuente para cualquier evaluación.
10. Acepto que si no cumplo con las Responsabilidades del cliente indicadas más arriba, PGW podría retirarme del Programa de Responsabilidad del Cliente.

**Aviso importante:** De conformidad con los requisitos de PUC, solamente los clientes que cumplen con los límites de ingresos pueden participar en el programa CRP. PGW utiliza fuentes internas y terceros al igual que determinaciones de beneficios estándar de la Administración del Seguro Social (Social Security Administration) y del Departamento de Servicios Humanos (Department of Human Services) para realizar auditorías y evaluar la información y documentación que los clientes proporcionan cuando solicitan el programa CRP. Si después de dicha investigación se determina que usted proporcionó información falsa, se le retirará del programa CRP y es posible que tenga que pagar los descuentos y cantidades que se le perdonaron durante el periodo en el que no calificaba para el programa. También podría estar sujeto a cargos penales por fraude. Al firmar a continuación, usted confirma que proporcionó información verídica y completa, leyó y entiende este aviso y acepta las responsabilidades del cliente

Representante de PGW \_\_\_\_\_ Firma del cliente \_\_\_\_\_ Fecha \_\_\_\_\_

**PHILADELPHIA GAS WORKS**  
800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

{SYSTEMDATE}

{SoldTo}  
{SoldTo2}  
{SoldTo3}  
{SoldTo4}  
{SoldTo5}

**CRP Application Mailing Address:**

Philadelphia Gas Works  
Customer Responsibility Program  
PO Box 3529  
Philadelphia PA 19122

RE: {ACCNO}

Dear {SOLDTO},

It's time to re-apply for enrollment in the Customer Responsibility Program (CRP). Your current enrollment expires on {DATE1}. **IMPORTANT: You must submit proof of income for the last 30 days with your application.** If you fail to do so, you may need to make an upfront payment to re-enroll, your application will be marked incomplete, and you may lose the program's benefits of discounted bills and debt forgiveness.

You can now re-apply online by visiting us at [www.pgworks.com/crp](http://www.pgworks.com/crp). We have enclosed an application if you would like to re-apply by mail. The current income guidelines for CRP are listed in the following chart. Even if you are not eligible based on income, we still encourage you to re-apply, as PGW offers applicants a special payment arrangement to pay off unpaid balances.

Maximum income, by number of people in the household					
	1	2	3	4	Each addtl
Monthly	\$1,699	\$2,289	\$2,879	\$3,469	\$590
Annual	\$20,385	\$27,465	\$34,545	\$41,625	\$7,080

To minimize delays in processing, be sure to complete the application fully and submit acceptable documentation. We recommend you submit your application within seven (7) days to allow time for processing. Remember, you can apply online at [www.pgworks.com/crp](http://www.pgworks.com/crp) or by mail. If you wish to apply by mail, send the application to the address in the upper right corner.

We hope to receive your application soon. Thank you for being a PGW customer.

Sincerely,

Philadelphia Gas Works

{SOLDTO}  
 {SOLDTO2}  
 {SOLDTO3}  
 {SOLDTO4}

{SYSTEMDATE}

**Asunto: {ACCNO}**

Estimado(a) {SOLDTO},

Es hora de volver a solicitar su inscripción en el Programa de responsabilidad del cliente (CRP). Su inscripción actual vence e{FECHA}, así que actúe ahora. **IMPORTANTE: Debe presentar prueba de ingresos de los últimos 30 días con su solicitud.** Si no lo hace, es posible que deba realizar un pago por adelantado para volver a inscribirse, su solicitud se marcará como incompleta y es posible que pierda los beneficios del programa de facturas con descuento y condonación de deudas.

Ahora puede volver a presentar su solicitud en línea visitándonos en [www.pgworks.com/crp](http://www.pgworks.com/crp). Adjuntamos una solicitud si desea volver a presentar una solicitud por correo. Las pautas de ingresos actuales para CRP se enumeran en la siguiente tabla. Incluso si no es elegible en función de sus ingresos, le recomendamos que vuelva a presentar una solicitud, ya que PGW ofrece a los solicitantes un acuerdo de pago especial para pagar los saldos impagos.

Ingreso máximo, por número de personas en el hogar para calificar					
	1	2	3	4	Cada adicional
Mensual	\$1,699	\$2,289	\$2,879	\$3,469	\$590
Anual	\$20,385	\$27,465	\$34,545	\$41,625	\$7,080

Para minimizar los retrasos en el procesamiento, asegúrese de completar la solicitud en su totalidad y enviar la documentación aceptable. Le recomendamos que envíe su solicitud dentro de los siete (7) días para dar tiempo a su procesamiento. Recuerde, puede presentar su solicitud en línea en [www.pgworks.com/crp](http://www.pgworks.com/crp) o por correo. Si desea presentar su solicitud por correo, envíe la solicitud a la dirección que se encuentra en la esquina superior derecha.

Gracias por ser cliente de PGW. Esperamos recibir su solicitud pronto.

Sinceramente,

Philadelphia Gas Works

**PHILADELPHIA GAS WORKS**  
800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

{SYSTEMDATE}

{SoldTo}  
{SoldTo2}  
{SoldTo3}  
{SoldTo4}  
{SoldTo5}

**CRP Application Mailing Address:**

Philadelphia Gas Works  
Customer Responsibility Program  
PO Box 3529  
Philadelphia PA 19122

RE: {ACCNO}

Dear {SOLDTO},

**FINAL REMINDER THAT YOU MUST RE-APPLY FOR THE CUSTOMER RESPONSIBILITY PROGRAM (CRP)**

Your enrollment in the Customer Responsibility Program (CRP) will expire soon and you must re-apply. We sent a reminder notice three weeks ago, along with an application and instructions for applying. If you already completed the application and mailed it in, please disregard this notice.

If you did not complete the application and mail it in, you must take action now. **IMPORTANT: You must submit proof of income for the last 30 days with your application.** If you fail to do so you may need to make an upfront payment to re-enroll, your application will be marked incomplete, and you may lose the program's benefits of discounted bills and debt forgiveness.

This is the final notice you will receive from PGW, prior to removing your account from the program.

If you misplaced the application or no longer have it:

- Visit our website at [www.pgworks.com/crp](http://www.pgworks.com/crp) and apply online
- Call 215-235-1000 to request another application

To minimize delays in processing, be sure to complete the application fully and submit acceptable documentation of income. If you wish to apply by mail, send the application to the address in the upper right corner.

Thank you for being a PGW customer. We hope to see your application soon.

Sincerely,

PGW Customer Affairs, Universal Services Department

{SOLDTO}  
{SOLDTO2}  
{SOLDTO3}  
{SOLDTO4}  
{SOLDTO5}

Asunto: {ACCNO}

Estimado(a) {SOLDTO},

## AVISO FINAL QUE DEBE VOLVER A SOLICITAR EL PROGRAMA DE RESPONSABILIDAD DEL CLIENTE (CRP)

Su inscripción en el Programa de responsabilidad del cliente (CRP) tiene un vencimiento y debe volver a aplicar. Le enviamos un recordatorio hace tres semanas, junto con una solicitud con instrucciones para volver a solicitar el programa CRP. Si ya completó la solicitud y la envió por correo, no se preocupe por este aviso.

Si no ha vuelto a presentar su solicitud y la ha enviado por correo, tome medidas ahora. AVISO: Debe presentar prueba de ingresos de los últimos 30 días con su solicitud. Si no lo hace, es posible que deba realizar un pago por adelantado para volver a inscribirse y su solicitud se marcará como incompleta, y es posible que pierda los beneficios del programa de que se le facture a una tarifa con descuento. También puede perder el beneficio de la condonación de la deuda. Si no completó la solicitud y la envió por correo, debe tomar medidas ahora.

**AVISO: Debe presentar prueba de ingresos de los últimos 30 días con su solicitud.** Si no lo hace, es posible que deba realizar un pago por adelantado para volver a inscribirse, su solicitud se marcará como incompleta y es posible que pierda los beneficios del programa de facturas con descuento y condonación de deudas.

Este es el aviso final que recibirá de PGW, antes de eliminar su cuenta del programa.

Si necesita otra aplicación:

- Visite nuestro sitio web en [www.pgworks.com/crp](http://www.pgworks.com/crp) y presente su solicitud en línea
- Llame al 215-235-1000 para solicitar otra solicitud.

Para minimizar las demoras en el procesamiento, asegúrese de completar la solicitud en su totalidad y presentar documentación aceptable de ingresos. Si desea presentar su solicitud por correo, envíe la solicitud a la siguiente dirección.

### **Dirección para enviar la solicitud de CRP:**

Philadelphia Gas Works  
Customer Responsibility Program  
PO Box 3529  
Philadelphia PA 19122

Gracias por ser cliente de PGW. Esperamos ver su aplicación pronto.

Atentamente,

Relaciones con los Clientes de PGW, Departamento de Servicios Universales

# PGW Customer Responsibility Program (CRP)

## What is CRP?

- CRP is a customer assistance program that can help low-income customers better afford their PGW bills and keep their gas service on.
- CRP provides discounted bills for eligible customers.
- CRP customers pay a monthly amount that is based on their gross household income and size or average bill amount, whichever is lower.

## Who is eligible for CRP?

- PGW residential customers
- Gross household income must be at or below 150 percent of the Federal Poverty Level (FPL)

## What types of agreements are offered through CRP?

- CRP agreements are based on the number of persons in the household and the total gross monthly household income or their average bill
- Poverty guidelines and maximum household income are based on federal figures. The dollar amounts change every year (see below).
- The minimum CRP charge is \$25 per month

Percent of Type	Percent of FPL	2022 Maximum Monthly Gross Income per Household Size				
		1	2	3	4	Each Additional Person
4% of income	0-50%	\$566	\$763	\$960	\$1,156	\$197
6% of income	51-150%	\$1,699	\$2,289	\$2,879	\$3,469	\$590





### ***What are the rules for participation?***

- Pay your monthly bill on time and in full.
- Apply for LIHEAP each year and assign the grant to PGW.
- Make a significant effort to conserve energy.
- Reapply for CRP each year or when the household size or income changes.
- Accept free weatherization services, if offered.

### ***What documentation do I need to apply for CRP?***

- Most recent 30 days proof of income for all members of the household who have an income or who receive benefits assistance.
  - Examples: Pay stubs; award letter or bank statement direct deposit from the Social Security Administration for Social Security, SSI, or SSDI benefits; documentation from the Department of Human Services (DHS) or a My COMPASS printout of the unemployment benefits or cash assistance received by yourself, other adults in your household or children in your household; documentation of child support payments; completed prior tax return forms or bank statements for self-employed individuals; completed Additional Financial Assistance section on the CRP application.
- Identification Numbers for all household members.
  - Examples: SSN, Passport Number, Visa Number, etc.

### ***How do I apply for CRP?***

- Apply online at [www.pgworks.com/CRP](http://www.pgworks.com/CRP)
- Print out an application in English or Spanish online and mail the application along with the required documentation to:

Philadelphia Gas Works  
Customer Responsibility Program  
P.O. Box 3529  
Philadelphia, PA 19122-0529

- PGW's Customer Service Centers are currently closed due to COVID-19

### ***What happens to my pre-CRP program arrears?***

- PGW will forgive 1/36<sup>th</sup> of your original pre-CRP debt each month for each bill paid in full.

### ***What happens if I don't pay my bills on time?***

- PGW will send you a notice informing you that you have 10-days to pay or your gas service could be shut-off.

### ***Could a CRP customer choose a gas supplier other than PGW?***

- No, you cannot choose a gas supplier and remain on CRP at the same time.
- CRP will provide greater savings for low-income customers than what will be available from gas suppliers.

**For more information, visit [www.pgworks.com/crp](http://www.pgworks.com/crp)**



# CRP eligibility

## CUSTOMER RESPONSIBILITY PROGRAM

Eligibility for CRP is based on household size and income. Renters and homeowners are eligible.

NUMBER OF PEOPLE IN HOUSEHOLD	MAXIMUM MONTHLY HOUSEHOLD INCOME	MAXIMUM ANNUAL HOUSEHOLD INCOME
1	\$1,699	\$20,385
2	\$2,289	\$27,465
3	\$2,879	\$34,545
4	\$3,469	\$41,625
5	\$4,059	\$48,705
6	\$4,649	\$55,785
7	\$5,239	\$62,865
8	\$5,829	\$69,945
For each additional person, add:	\$590	\$7,080

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**b. CRP Final Billing**

The Commission made one clarification request regarding 1. CRP, b. CRP Final Billing, on page 22 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** By Secretarial Letter dated July 17, 2019 ("Letter"), the PUC initiated an inquiry into customer assistance program ("CAP") final billing practices with the goal of determining whether the PUC should establish a standardized CAP final billing "policy" for all jurisdictional energy utilities. As determined by the PUC Order ("Bill Order") from that inquiry:

We shall address how the energy utilities describe their final billing practices for CAP customers in utility-specific proceedings. If further clarity is needed, we may address this topic in the universal service rulemaking proceeding or other proceedings as necessary.

Docket M-2019-3010190, Staff Review of Customer Assistance Program (CAP) Final Billing Methods, Order, entered March 12, 2020.

The PUC has not issued a CAP regulation on final bills for prior CAP customers. PGW's CAP customers are removed from CAP upon termination or discontinuance of service. Subsequently, when a terminated/discontinued customer is final billed (the "Final Bill") the customer is no longer a CAP customer and is final billed for actual usage at the full residential tariff rate for the Final Bill month. The total Final Bill includes all debt owed by the customer, including current usage at the full tariff rate, unsatisfied pre-program arrears, and unpaid CAP bills. If the customer seeks reconnection and reinstatement on CAP, they must pay only the unpaid CAP bills. PGW's CAP Final Bill process has not changed since the Bill Order. The consumer is no longer a CAP customer at final billing.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**c. Refund of Security Deposits**

The Commission made one clarification request regarding 1. CRP, c. Refund of Security Deposits, on page 23 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** Prior to entering a customer onto CRP, the PGW representative reviews the account to verify whether a deposit is due or "on-hand" (paid). If a deposit is due, the deposit is canceled. If the deposit is "on-hand", the deposit plus any accrued interest is applied to the account pre-CRP activation.

Safeguards are in place to ensure CRP customers are waived/refunded deposits. PGW's Account Management Department receives an exception report that identifies CRP accounts that owe or have paid a deposit that was not subsequently refunded. If such cases are identified, the deposit is removed (waived) or refunded.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**d. LIHEAP**

The Commission made one clarification request regarding 1. CRP, d. LIHEAP, on page 24 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** PGW does not penalize CRP customers for not applying for LIHEAP or assigning the grant to PGW. However, PGW proposes to continue to require application for a LIHEAP grant in its CAP customer obligations as it can serve as an encouragement to apply for LIHEAP monies, with no penalty. As Pennsylvania has not integrated federal LIHEAP funding into its CAPs, this is one way to encourage customers to take advantage of all available resources, including federal dollars.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**e. LIHEAP Recertification**

The Commission made one clarification request regarding 1. CRP, e. LIHEAP Recertification, on page 25 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** CRP customers are granted a two-year recertification waiver if they apply for LIHEAP and assign the grant to PGW. However, they must recertify at least once every three years, even if they receive an additional LIHEAP grant and assign it to PGW.

For recipients of a two-year waiver, PGW's system analyzes the account to see if the CRP monthly payment is still beneficial. The analysis is based on previously reported income. If the CRP agreement amount changes as a result of the analysis, PGW sends a letter to the customer notifying them of the change.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

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

The Commission made one clarification request regarding 1. CRP, f. External sources used to verify CRP customers household composition and income, on page 26 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** No change. PGW does not use unregulated data brokers or credit reports to verify household composition and income.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**g. Unearned Income for a Child**

The Commission made one clarification request regarding 1. CRP, g. Unearned Income for a Child, on page 27 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** PGW does not include earned income of minors in its CRP household income determination, but does include unearned income of minors such as Social Security income. PGW believes this is generally consistent with how the Department of Human Services counts income for LIHEAP purposes. PGW does not propose a change in this approach. Furthermore, PGW does not have sufficient data to analyze the cost of implementing this modification, which is likely to be significant.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**h. Verifying Zero-Income**

The Commission made one clarification request regarding 1. CRP, h. Verifying Zero-Income, on pages 28-29 of the Order. PGW's responses are as follows:

***Request: 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 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.***

**PGW Response:** PGW's CRP application requests that customers provide an explanation for adults 18 and older, who do not have an income. They are instructed to use the allotted space to explain their current situation (e.g., "applied for unemployment, but not eligible", "enrolled in high school/college"). See "Important" section of the attached CRP application. The online application also provides applicants with space to provide an explanation of their current circumstance, including how they meet basic living expenses such as housing, food, and utilities. See attached Statement of Income section image.

PGW does not consider ongoing support from a friend or family member as zero-income. Ongoing support from a friend or family member is financial assistance and is used in determining the customer's monthly payment under the CRP. This is documented using the completion of an "Additional Financial Assistance Affidavit" (see attached). The person providing the assistance must sign this affidavit, verifying the support.

## STATEMENT OF NO INCOME

You have indicated that neither you, nor anyone in your household, has received any type of income, financial assistance, child support, nor any other type of cash assistance within the last 30 days, other than SNAP benefits, a housing voucher, or a Philadelphia Housing Authority utility payment. If this is not correct, please go back and provide income information. If this is correct, please describe below how your household meets the basic needs of food, housing, and utilities each month.

Food\*

You must provide a response for how you cover food expenses for your household.

Housing\*

You must provide a response for how you cover housing expenses for your household.

Utilities\*

You must provide a response for how you cover utility expenses for your household.

Save & Close 

 Back

Next 



## Additional Financial Assistance Affidavit

If someone not living in your home provides financial assistance to you or someone else in your home, they must complete the section below and sign where noted.

**Note:** PGW may require verification of the information stated in this section. This form is only to be completed and signed by the person providing assistance.

### Person Getting Assistance

Account Number

First Name

Middle Initial

Last Name

Address

Apt

City

State

Zip

### Person Giving Assistance

First Name

Middle Initial

Last Name

Address

Apt

City

State

Zip

Phone Number

By signing in the space provided below, I certify that I provide \$\_\_\_\_\_ per month in cash assistance to the CRP applicant listed at the top of this form and I understand that PGW can request verification of this information.

Signature of person giving assistance

Date

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**i. Exempt CAP Customers from Late Payment Charges**

The Commission made one clarification request regarding 1. CRP, i. Exempt CAP Customers from Late Payment Charges, on pages 29 of the Order. PGW's responses are as follows:

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

**PGW Response:** Yes, late payment charges and security deposits are waived for CRP customers.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**j. Transfer of Service**

The Commission made one clarification request regarding 1. CRP, j. Transfer of Service, on pages 30 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** CRP households retain program enrollment when they move to another residence within Philadelphia. At the time of application for service, if the customer has an existing account with PGW, the same account number is used to establish service at the new address. In these instances, a transfer of service is entered, which allows the customer to retain program enrollment and its benefits.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**k. Evaluating Household CAP Bills**

The Commission made three clarification requests regarding 1. CRP, k. Evaluating Household CAP Bills, on pages 30-31 of the Order. PGW's responses are as follows:

***Request: 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:***

***(1) Identify when its new CIS is scheduled to be implemented***

**PGW Response:** Currently, the new CIS implementation is scheduled for the end of September 2023. This is the current date, but there is a possibility it may not be the final implementation date.

***(2) Identify when quarterly review of CRP bill amounts will begin –***

**PGW Response:** The review process will begin with the new CIS implementation.

***(3) Include this new process and timeline in its 2023 USECP.***

**PGW Response:** PGW will add this to the compliance filing.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**I. Identification Documentation**

The Commission made one clarification request regarding 1. CRP, I. Identification Documentation, on pages 31 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:**

Below are all forms of identification that PGW accepts:

Adult:

- Philadelphia identification card
- Social Security Number
- H1B Visa Number
- Passport Number

Non-adult household member:

- Philadelphia identification card
- Social Security Number
- Individual Tax Identification Number (ITTN).
- H1B Visa Number
- Passport Number
- Hospital Birth Certificate (Newborn less than 6 months old)

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**m. Outreach and Education Plan**

The Commission made five clarification requests regarding 1. CRP, m. Outreach and Education Plan, on pages 32 of the Order. PGW's responses are as follows:

***Request: 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:***

- (1) 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).***
- (2) 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.***
- (3) Explain whether and how the components of its CEOP are provided to each community within its service territory.***
- (4) Provide copies of its CRP brochures and customer bill inserts that outline the program guidelines and customer responsibilities.***
- (5) Provide an explanation of how it chose which languages to translate its CRP application into.***

Response provided by: Melanie McCottry

**PGW Response (1):**

Each of the initiatives mentioned in the CEOP could technically be considered as existing. However, there have been a number of modifications and new tools that have been adopted since 2019 and modifications that are ongoing. For example:

- PGW enhanced CRP communications by translating its existing CRP brochure available in English and Spanish into 13 additional languages in January 2022.
- PGW added virtual outreach meetings to its calendar due to the pandemic in 2020.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW’s Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

- PGW included paid social media advertising campaign in 2021 to its existing mass media portfolio to promote CRP, targeting individuals who live in Philadelphia zip codes with higher concentrations of customers whose incomes are below the federal poverty threshold.

These initiatives show PGW’s continual process of making improvements to enhance customer experience and access.

**PGW Response (2):**

PGW conducts over 100 weatherization workshops annually in Philadelphia. These workshops help customers understand their own “household energy burden” and provide free home weatherization kits to attendees. PGW also partners with Philadelphia Neighborhood Energy Centers (NECs). PGW trains energy counselors at each NEC on how customers can better understand their “household energy burden” and CRP, and provides leave behind materials that offer CRP information, energy saving tips and ways to better conserve.

**PGW Response (3):**

As outlined in the USECP, PGW specifically targets consumer education outreach and mass advertising towards communities at or below the federal poverty level. Further, PGW utilizes publicly available demographic data to assist with identifying its most vulnerable customers. Publicly available income data, for instance, is vitally important to our efforts because an individual’s or families’ income can change throughout the year. It is important that PGW base our outreach and messaging using reliable, unbiased data to stay flexible and attune to our customers’ ever-changing needs.

PGW reviews income levels bi-annually by zip code to identify when individuals and families live at or below the federal poverty level. PGW examines demographic data in January when federal poverty guidelines are released and re-examines data again in August in advance of the fall/winter heating season.

PGW then researches each identified zip code by age, gender, national origin, and other factors to customize its messaging based on the audience PGW is targeting. This keeps PGW’s information relevant and timely and ensures that PGW is reaching all members of its community. PGW’s goal is for its outreach and messaging plans to remain flexible to ensure that it can respond quickly to changing community needs.

**Response (4):**

PGW CRP applications & brochure: [PGW CRP Applications & Brochures- Online](#)

Customer bill inserts – 2020 to present:

<a href="#">May</a>	2020
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**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW’s Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

<a href="#">June</a>	2020
<a href="#">July</a>	2020
<a href="#">September</a>	2020
<a href="#">October</a>	2020
<a href="#">November</a>	2020
<a href="#">December</a>	2020
<a href="#">Januray</a>	2021
<a href="#">February</a>	2021
<a href="#">April</a>	2021
<a href="#">May</a>	2021
<a href="#">June</a>	2021
<a href="#">July</a>	2021
<a href="#">September</a>	2021
<a href="#">December</a>	2021
<a href="#">February</a>	2022
<a href="#">April</a>	2022
<a href="#">May</a>	2022
<a href="#">July</a>	2022

**PGW Response (5):**

Languages were selected for the CRP application translation based on input from PGW’s universal services advisory committee. The PUC’s Bureau of Consumer Services is a member of this committee.

Currently the CRP application is available to customers in 15 different languages on pgworks.com including English: Arabic, Chinese (simplified and traditional), Dari, French, Karenic, Pasto, Portuguese, Russian, Spanish, Swahili, Ukrainian, Urdu, and Vietnamese. The English and Spanish documents were existing, ongoing practices, the others were made available in January 2022.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**B. 2. Home Comfort**

**a. LIME Pilot Program**

The Commission made five clarification requests regarding 2. Home Comfort, a. LIME Pilot Program, on pages 35 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:**

See the following attached documents related to the LIME program:

- Program fact sheet
- Landlord Consent Form

PGW can perform any gas energy efficiency measure installed as part of a cost-effective job. A listing of measures is below:

- Heating system:
  - Installation of furnaces, residential or commercial-sized boilers
  - Heating system repairs
  - Programmable or smart thermostats
  - Duct sealing and insulation
- Hot Water:
  - Replacement of hot water heater
  - Low flow faucet aerators and showerheads
- Building Shell:
  - Air sealing
  - Roof and wall insulation
- Other / Custom Measures
  - PGW may also consider custom measures like building controls and occupancy sensors, and other custom measures



## **PGW Low Income Multifamily Efficiency (LIME) Program**

### **Background**

PGW's LIME program offers free or low-cost energy saving retrofits to owners of income-qualified multifamily housing. Under this program, PGW pays for most or all of the energy saving measures installed, which could include low-flow plumbing fixtures, upgraded thermostats, air sealing, insulation, and in some cases improvements to heating or hot water systems.

### **Eligibility**

In order for a property to qualify for consideration, a minimum of 75% of a building's gas usage must come from tenants who are at or below 150% of the Federal Poverty Level. See Attachment A for income guidelines.

### **Costs**

PGW pays for 100% of approved work serving income-qualified tenants. PGW will also pay for 33% of project costs serving all other tenants (i.e., not income qualified), and the property owner is asked to cover the remaining costs for these residents. As an example, if 90% of a building's gas usage is by income-qualified tenants, and the building has \$10,000 worth of work completed, PGW would pay \$9,333 and the building owner would be asked to pay \$666. Before any work is completed, PGW provides property owners with a list of recommended measures and required cost share for review and approval.

### **Energy Saving Measures**

Potential energy saving measures could include:

- Low-flow plumbing fixtures
- Air sealing
- Insulation
- Upgraded thermostats
- Heating or hot water system improvements

The measure mix for each building will depend on (1) the results of an energy audit conducted by PGW's program contractor, (2) the cost effectiveness of applicable energy saving measures, and (3) budgetary considerations. In order for the program contractor to adequately prepare for an energy audit prior to an on-site visit, building owners may be asked to provide background on the facility's maintenance history and equipment replacement schedules. Some low-cost, energy saving measures may be installed at the time of the audit.



## PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

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### Program Goals

The program seeks to make customers' homes more energy efficient and comfortable by:

- Installing high-impact, low-cost core measures.
- Providing comprehensive, cost-effective weatherization services, as feasible.
- Raising awareness of energy conservation and encouraging the incorporation of energy saving behavior in both individually metered and master metered low-income multifamily buildings.

### Program Steps

1. PGW reviews applications and prioritizes buildings based on income composition of the tenants and natural gas usage.
2. Top candidates will be asked to provide documentation of tenants' income. PGW may also request information on facility equipment and maintenance history.
3. Properties selected to participate in the program will receive an energy audit and have gas conservation measures installed by PGW's program contractor, CMC Energy Services. PGW and its program contractor will be in regular communication with the building owner and tenants throughout this process.
4. PGW's program inspector, Performance Systems Development, will perform a basic on-site verification on a sample of units to confirm that the equipment is installed to program standards.
5. Upon verification, the project is complete and the program contractor will submit final invoices to the property owner for any agreed-upon measures that require building owner cost share.

### Further Information

For questions and additional information, contact Peter Lewis, Energy Efficiency & Emerging Customer Programs Analyst, at (215) 684-6775 or [peter.lewis@pgworks.com](mailto:peter.lewis@pgworks.com).



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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**Attachment A: 2022 Federal Poverty Level Guidelines**

**150% Federal Poverty Level**

<b>Persons in household</b>	<b>Annual Income</b>
1	\$ 20,385
2	\$ 27,465
3	\$ 34,545
4	\$ 41,625
5	\$ 48,705
6	\$ 55,785
7	\$ 62,865
8	\$ 69,945

Add \$4,720 for each additional person over 8.

**PHILADELPHIA GAS WORKS**

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Jan 14, 2019



Dear

The PGW customer residing at your property ( [REDACTED] ) has been selected as a potential candidate for free weatherization upgrades that will make the home more comfortable. These treatments are a free customer benefit that PGW offers to select customers as part of its Home Comfort program. Your tenant will also receive a letter, similar to this one, explaining this PGW program.

The types of eligible weatherization may include:

- Carbon Monoxide detectors
- Programmable thermostats
- Attic and basement insulation
- Sealing leaks that let warm air out or cold air in
- Heater or water heater replacement (depending on program guidelines)

Before we can consider your property for these free weatherization upgrades, we need you to complete and return the enclosed Landlord Consent Form.



Philadelphia, PA [REDACTED]

Here's what you can expect:

- Our licensed and insured contractor, [REDACTED] (" [REDACTED] "), may contact the PGW customer in your property and ask a few questions about the home. [REDACTED] or your tenant may also contact you regarding the proposed project and the required Landlord Consent Form.
- Not every candidate is selected for participation in the Home Comfort program. If your property is not included at this time, you may be contacted again during a selection period.
- If the home matches our program requirements, and you and the tenant agree to participate, [REDACTED] will set up an appointment with the tenant to perform an energy audit at the home. As the landlord, you are not required to be present, but you may attend.
- The contractor will explain the the energy audit process, make several health and safety checks, test the home for warm air leaks, and sit down with the tenant to go over energy saving tips, other PGW programs, and any recommended follow-up measures.
- [REDACTED]'s contractors may call the tenant to schedule additional visits to perform work, such as insulation, air sealing and heater replacements.
- When all work is complete, PGW may contact the tenant to assess the work performed and the level of service provided.

We look forward to working with you. If you have any questions, please contact [REDACTED] at 215-[REDACTED].

Sincerely,

Customer Programs  
Philadelphia Gas Works

**PGW'S HOME COMFORT PROGRAM**  
**LANDLORD AUTHORIZATION AND RELEASE OF ALL CLAIMS**

Property Address \_\_\_\_\_ Tenant  
Name \_\_\_\_\_  
Property Owner's Name and Mail Address \_\_\_\_\_



23

I, the owner of the above property ("Property"), authorize [REDACTED] (" [REDACTED] ") and Philadelphia Gas Works (PGW) to weatherize my Property under PGW's Home Comfort Program. I understand that my current tenant (s) has agreed to participate in Home Comfort. I agree that [REDACTED], PGW and their respective contractors may enter my Property to inspect it, install usage reduction measures, and make such Property repairs and improvements (collectively the "Program Measures") as they deem appropriate under the PGW Home Comfort Program, may examine any records relating to utility usage and charges with respect to the Property, and may release to their respective designees information about the Property and the Program Measures made at the Property.

I, as the Property owner, agree and warrant that if the tenant complies with ongoing obligations and responsibilities owed to the landlord: (i) I shall not evict the tenant at the Property for at least twelve (12) months after the completion of the Program Measures; and (ii) I shall not raise the tenant's rent unless the rent increase is related to matters other than the installation of the Program Measures.

In consideration for the Program Measures to my Property, on behalf of myself, my estate, my executors and administrators, and my heirs, I hereby (i) release, waive, discharge, indemnify and hold harmless PGW, Philadelphia Facilities Management Corporation, and the City of Philadelphia, and their respective owners, officers, directors, and employees from any and all known and unknown, foreseen and unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof arising out of or in any way associated with the Property, the Program Measures and/or the weatherization materials provided to the Property; and (ii) release, waive, discharge, indemnify and hold harmless [REDACTED] and its owners, officers, directors, and employees from any and all known and unknown, foreseen and unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof arising out of or in any way associated with the Property to the extent they arise from or are related to the act(s), omission(s), negligence or fault of the Property owner, tenant, third party, and/or Property owner employee(s), contractor(s) or agent(s).

I acknowledge that PGW, [REDACTED], and their contractors DISCLAIM ALL WARRANTIES, IMPLIED OR EXPRESS, INCLUDING ANY WARRANTIES OF MERCHANTABILITY WITH RESPECT TO THE PROGRAM MEASURES AND THE WEATHERIZATION MATERIALS PROVIDED TO THE PROPERTY AND THE RESULTS OF THEIR INSTALLATION. I also acknowledge that any energy savings projected by PGW, [REDACTED], or their contractors as a result of the installation of weatherization materials are only an estimate.

Property Owner(s) Signature(s): \_\_\_\_\_

Property Owner(s) Signature(s): \_\_\_\_\_

Date: \_\_\_\_\_

**PGW'S LOW INCOME MULTIFAMILY EFFICIENCY PROGRAM**  
**LANDLORD AUTHORIZATION AND RELEASE OF ALL CLAIMS**

Property Address(es):

Property Owner:

As of the \_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ (“Effective Date”), Property Owner (“Owner”) listed above authorizes [REDACTED] (“[REDACTED]”) and Philadelphia Gas Works (“PGW”) to weatherize the Property listed above (“Property”) under PGW’s Low Income Multifamily Efficiency (“LIME”) program. Owner agrees that [REDACTED], PGW and their respective contractors may enter the Property to inspect it, install usage reduction measures, and make such repairs and improvements at the Property (collectively the “Program Measures”) as they deem appropriate, may examine any records relating to utility usage and charges with respect to the Property, and may release to their respective designees information about the Property and the Program Measures.

Owner, agrees to the following:

- a) if the tenant complies with ongoing obligations and responsibilities owed to the landlord:
  - (i) Owner shall not evict the tenant at the Property for at least twelve (12) months after the completion of the Program Measures, unless the eviction is due to tenant’s violation of the applicable lease or is otherwise unrelated to the installation of the Program Measures; and
  - (ii) Owner shall not raise the tenant’s rent unless the rent increase is related to matters other than the installation of the Program Measures.
- b) PGW may, for a period of five (5) years following the installation, inspect the Property or install equipment to monitor usage of any Program Measures.
- c) PGW may publicly use information about, and photographs of, the Efficiency Improvements at the Facility. PGW may discuss and display copies of the photographs of any Efficiency Improvements to other customers who are considering participating in one of PGW’s efficiency programs, or other persons.
- d) Any warranties for equipment and materials installed shall be assigned to the Owner. Any defects in the work caused by improper installation shall be corrected by [REDACTED] for a period of one (1) year from the agreement date.

Owner represents and warrants that the income composition of the Property listed in Exhibit A is correct as of the Effective Date. Owner must notify PGW if, on or before the installation of Program Measures, occupancy changes result in fewer than 75% of the Property’s residents’ having income at or below 150% of the Federal Poverty Limit. PGW may modify or discontinue the planned installation of Program Measures based on changes to the income composition listed in Exhibit A.

In consideration for the Program Measures to the Property, on behalf of myself, my estate, my executors and administrators and my heirs, Owner hereby (i) releases, waives, discharges, indemnifies and holds harmless PGW, Philadelphia Facilities Management Corporation, and the City of Philadelphia, and their respective owners, officers, directors, and employees from any and all known and unknown, foreseen and unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage or damage to tenant property), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof directly or indirectly arising out of or in any way associated with the Property, the Program Measures and/or the weatherization materials provided to the Property; and (ii) releases, waives, discharges, indemnifies and holds harmless [REDACTED] and its owners, officers, directors, and employees from any and all known and unknown, foreseen and

unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage or damage to tenant property), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof directly or indirectly arising out of or in any way associated with the Property, the Program Measures and/or the weatherization materials provided to the Property, except to the extent they arise from the negligence or willful misconduct of [REDACTED], including its respective affiliates, employees and subcontractors.

Owner acknowledges that PGW DISCLAIM ALL WARRANTIES, IMPLIED OR EXPRESS, INCLUDING ANY WARRANTIES OF MERCHANTABILITY WITH RESPECT TO THE PROGRAM MEASURES AND THE WEATHERIZATION MATERIALS PROVIDED TO THE PROPERTY AND THE RESULTS OF THEIR INSTALLATION. Owner also acknowledges that any energy savings projected by PGW, [REDACTED], or their contractors as a result of the installation of weatherization materials are only an estimate.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_



**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**c. Repair and Renew Pilot Program**

The Commission made five clarification requests regarding 2. Home Comfort, c. Repair and Renew Pilot Program, on pages 38 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:**

- (1) PGW's fiscal year is September 1 to August 31
- (2) Below are the common categories for why PGW may issue a heater hazard tag for safety reasons:
  - i. Combustible appliances installed in unsafe location
  - ii. Unsafe installation or defective parts, such as no safety pilot, temperature/pressure relief valve, cracked heat exchanger
  - iii. Venting issues, such as damaged flue or unsuitable venting material, obstructed chimney
  - iv. Boiler and hot water heater leaks
  - v. Fuel line issues, including gas leaks, or other unsafe conditions
  - vi. High carbon monoxide readings
- (3) PGW calculates customer usage based on the weather normalized usage over the past 12 months. PGW does not have a separate process for calculating usage for customers whose service is off or the system has been inoperable. Since the Repair and Renew program responds to immediate heating hazard issues - over the last month - it can be expected that usage will be evaluated based on 11 out of 12 months over the last year if the customer's heater is inoperable. Further, in some cases having a heater that is operating improperly can consume more energy than a properly working heater.
- (4) Cost-effectiveness calculations are used to determine what measures would be installed. Each job must be cost-effective when excluding the costs from the table on page 23 of the USECP. Steps are as follows:
  - i. Gas, electric and water savings are calculated for each energy efficiency measure installed, based on PGW's Technical Reference Manual (TRM). Calculations are performed in the program Contractor Tool.
  - ii. Each measure installed has a dollar value calculated for measure cost, and the benefits are monetized based on avoided costs.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

- iii. If a job is not cost-effective, the contractor can apply all or some of the costs of the measure in the cost-exclusion category as long as that amount is below the maximum listed in the Cost exclusion table. As long as the job has a benefit to cost ratio (BCR) above 1.0, with the health and safety costs excluded, the job would be completed.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**d. Quality Control and Contractor Requirements**

The Commission made five clarification requests regarding 2. Home Comfort, d. Quality Control and Contractor Requirements, on pages 38 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** PGW has the following certification requirements for its contractors:

- Energy Auditors: Required to have current Building Performance Institute (BPI) Building Analyst certification and OSHA 10 certification. BPI sets certifications and standards for home performance, and energy auditors are required to take a written test and field test.
- Auditors: Required to earn BPI Healthy Home Evaluator certification within six months of working in the program.
- Crew Leaders: Required to have BPI Building Analyst, BPI Envelope Professional and OSHA 10 certifications.
- Crew leaders: Required to earn BPI Healthy Home Evaluator certification within 6 months of working in the program.

Conservation Service Providers (CSP) are required to provide PGW and the program inspector the names of any new employees working in the program. All auditors and crews working in the program are required to receive on-site shadowing by the program inspector.

PGW holds an annual training with all field staff and energy auditors to review program requirements and cover two to three priority building science topics, based on current program needs. PGW's inspector also holds quarterly meetings with each CSP to review inspection findings and talk through work quality issues and recommendations for improvement. The inspector also provides on-site mentoring for auditors and field staff.

PGW performs inspections on 10% of full-home weatherization cases, as well as on a smaller number of limited weatherization cases. Cases for inspection are either chosen randomly or based on certain measure criteria, as detailed below. PGW may also send an inspector to homes if there are customer complaints or health and safety issues.

PGW performs four types of inspections:

- (1) Basic – routine and by random selection.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

- (2) Enhanced – can be chosen at random, but may also be triggered by based on pre-usage, savings amount, air leakage rates, by repeated CSP issues, or by specific customer complaints.
- (3) Audit Shadowing – coordinated by CSP and inspector in order for inspector to review quality, technical ability, and customer service skills of auditor, and then recommend opportunities for training and improvement.
- (4) In-process Job Shadowing – coordinated by CSP and inspector, in order for inspector to review quality, technical ability, and customer service skills of production team during measure installations, and then recommend opportunities for training and improvement.

CSPs are required to—as a matter of practice—regularly close cases as soon as is practicable after energy conservation measures have been installed. This ensures that the quality of work that is evaluated during an inspection reflects work recently performed by a CSP. The CSP is required to provide the inspector all relevant job documents. CSPs are encouraged to attend inspections.

The inspector will provide the CSP and PGW with a report after the inspection. CSPs are required to respond to corrective action items and return to homes to fix any significant health and safety and work quality issues identified.

The inspector scores the CSP on the following categories:

- Procedure
- Customer engagement and satisfaction
- Combustion safety
- Health and safety
- Air leakage
- Insulation
- HVAC
- Baseload measures and hot water

In addition to third party inspections, each CSP performs Self-Certification BPI-level “test-out” inspections of all subcontractor and staff member work. This helps to build in accountability within the CSP’s protocols. Self-Certification inspections must address the comprehensiveness of the work scope initially recommended and identify any lost opportunities for cost-effective efficiency, as well as the quality of the installation, the accuracy of data tracking, and the adequacy of documentation. Deficiencies identified by the CSP and/or the customer during this test-out must be addressed by the CSP at no additional cost to either the customer or PGW.

PGW strives to retain flexibility in the above areas so that it can be responsive to industry standard improvements and customer needs.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**e. Home Comfort Eligibility**

The Commission made one clarification request regarding 2. Home Comfort, e. Home Comfort Eligibility, on pages 39-40 of the Order. PGW's responses are as follows:

***Request: 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 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.***

**PGW Response:** PGW does not treat customers in the 151% - 200% of FPL tier and does not have the number of special needs customers in 151-200% FPL. A significant proportion of PGW's residential customer base is low income (150% FPL and below) and Home Comfort is designed to address the significant need for Home Comfort services in PGW's service territory.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**f. Define Single-family & Multi-family Properties**

The Commission made one clarification request regarding 2. Home Comfort, f. Define Single-family & Multi-family Properties, on page 40 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** A single-family residence is defined as any housing unit which is:

- Physically detached from any other housing unit (no building surfaces are common to any other housing unit or commercial space); OR
- Physically attached to another housing unit or commercial space but with boundary walls extending from the ground to the roof (no housing units, commercial spaces or common spaces above or below); AND
- Directly accessible from the outdoors without using a space shared by another housing unit or commercial space; AND
- Supplied with space and water heating with its own individual mechanical system(s)."

Multifamily property is defined as any property with two or more residential units. The residential portions of a mixed-use property can be treated within LIME.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**g. Landlord Approval Process**

The Commission made one clarification request regarding 2. Home Comfort, g. Landlord Approval Process, on page 41 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** See attached for a sample copy of the letter sent to landlords.

PGW requires written consent from landlords and for legal reasons does not allow verbal consent. The landlord is mailed a consent form. The CSP will also provide the consent form to the tenant to collect their landlord's signature if possible. When speaking with the landlord, the CSP will explain the Home Comfort program, the energy assessment process, potential measures that may be installed, and that there is no cost required of the customer or landlord.

**PHILADELPHIA GAS WORKS**

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Jan 14, 2019



Dear

The PGW customer residing at your property ( [REDACTED] ) has been selected as a potential candidate for free weatherization upgrades that will make the home more comfortable. These treatments are a free customer benefit that PGW offers to select customers as part of its Home Comfort program. Your tenant will also receive a letter, similar to this one, explaining this PGW program.

The types of eligible weatherization may include:

- Carbon Monoxide detectors
- Programmable thermostats
- Attic and basement insulation
- Sealing leaks that let warm air out or cold air in
- Heater or water heater replacement (depending on program guidelines)

Before we can consider your property for these free weatherization upgrades, we need you to complete and return the enclosed Landlord Consent Form.



Philadelphia, PA [REDACTED]

Here's what you can expect:

- Our licensed and insured contractor, [REDACTED] (" [REDACTED] "), may contact the PGW customer in your property and ask a few questions about the home. [REDACTED] or your tenant may also contact you regarding the proposed project and the required Landlord Consent Form.
- Not every candidate is selected for participation in the Home Comfort program. If your property is not included at this time, you may be contacted again during a selection period.
- If the home matches our program requirements, and you and the tenant agree to participate, [REDACTED] will set up an appointment with the tenant to perform an energy audit at the home. As the landlord, you are not required to be present, but you may attend.
- The contractor will explain the the energy audit process, make several health and safety checks, test the home for warm air leaks, and sit down with the tenant to go over energy saving tips, other PGW programs, and any recommended follow-up measures.
- [REDACTED]'s contractors may call the tenant to schedule additional visits to perform work, such as insulation, air sealing and heater replacements.
- When all work is complete, PGW may contact the tenant to assess the work performed and the level of service provided.

We look forward to working with you. If you have any questions, please contact [REDACTED] at 215-[REDACTED].

Sincerely,

Customer Programs  
Philadelphia Gas Works

**PGW'S HOME COMFORT PROGRAM**  
**LANDLORD AUTHORIZATION AND RELEASE OF ALL CLAIMS**

Property Address \_\_\_\_\_ Tenant  
Name \_\_\_\_\_  
Property Owner's Name and Mail Address \_\_\_\_\_



23

I, the owner of the above property ("Property"), authorize [REDACTED] (" [REDACTED] ") and Philadelphia Gas Works (PGW) to weatherize my Property under PGW's Home Comfort Program. I understand that my current tenant (s) has agreed to participate in Home Comfort. I agree that [REDACTED], PGW and their respective contractors may enter my Property to inspect it, install usage reduction measures, and make such Property repairs and improvements (collectively the "Program Measures") as they deem appropriate under the PGW Home Comfort Program, may examine any records relating to utility usage and charges with respect to the Property, and may release to their respective designees information about the Property and the Program Measures made at the Property.

I, as the Property owner, agree and warrant that if the tenant complies with ongoing obligations and responsibilities owed to the landlord: (i) I shall not evict the tenant at the Property for at least twelve (12) months after the completion of the Program Measures; and (ii) I shall not raise the tenant's rent unless the rent increase is related to matters other than the installation of the Program Measures.

In consideration for the Program Measures to my Property, on behalf of myself, my estate, my executors and administrators, and my heirs, I hereby (i) release, waive, discharge, indemnify and hold harmless PGW, Philadelphia Facilities Management Corporation, and the City of Philadelphia, and their respective owners, officers, directors, and employees from any and all known and unknown, foreseen and unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof arising out of or in any way associated with the Property, the Program Measures and/or the weatherization materials provided to the Property; and (ii) release, waive, discharge, indemnify and hold harmless [REDACTED] and its owners, officers, directors, and employees from any and all known and unknown, foreseen and unforeseen bodily and personal injuries, death, illness, damage to property (including without limitation, environmental damage), and any and all other losses, claims, costs, liabilities and damages and any consequences thereof arising out of or in any way associated with the Property to the extent they arise from or are related to the act(s), omission(s), negligence or fault of the Property owner, tenant, third party, and/or Property owner employee(s), contractor(s) or agent(s).

I acknowledge that PGW, [REDACTED], and their contractors DISCLAIM ALL WARRANTIES, IMPLIED OR EXPRESS, INCLUDING ANY WARRANTIES OF MERCHANTABILITY WITH RESPECT TO THE PROGRAM MEASURES AND THE WEATHERIZATION MATERIALS PROVIDED TO THE PROPERTY AND THE RESULTS OF THEIR INSTALLATION. I also acknowledge that any energy savings projected by PGW, [REDACTED], or their contractors as a result of the installation of weatherization materials are only an estimate.

Property Owner(s) Signature(s): \_\_\_\_\_

Property Owner(s) Signature(s): \_\_\_\_\_

Date: \_\_\_\_\_

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**h. Usage Requirement: Coordinating LIURP services**

The Commission made one clarification request regarding 2. Home Comfort, h. Usage Requirement: Coordinating LIURP services, on page 42 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** Yes. PGW assigns the top 25-30% of its low-income customers in Home Comfort but PGW allows customers who are in the top 50% of low-income users to be manually assigned in the Home Comfort program if there is opportunity to partner with another agency and coordinate treating the case. PGW has found that there is value in coordinating with other agencies and it is difficult to find customers who qualify for multiple programs.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**i. Routine Health & Safety measures and Incidental Repairs**

The Commission made one clarification request regarding 2. Home Comfort, i. Routine Health & Safety measures and Incidental Repairs, on page 43 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** PGW's Health and Safety pilot program awards \$100,000 annually to CSPs to support health and safety measures that can be completed outside of the cost-effectiveness review, that would allow for comprehensive weatherization.

CSPs are required to submit requests for cases in which they intend to use pilot funds. Requests should satisfy the following criteria:

- Projected savings for projects must be at least 15%.
- Each case should not use more than \$3,000 for health and safety pilot measures.
- Health and safety work cannot be incorporated into the full job work scope cost effectively (i.e., achieving a benefit to cost ratio at or above 1.0) without utilizing these pilot funds.
- Funds must be used to address a legitimate health and safety issue, which must be detailed in the proposal.

CSPs are allowed to incorporate health and safety measures into work scopes beyond this, but they need to be cost-effective. Thus, funds from this pilot are not intended to be used for measures that can be completed cost-effectively without the cost exclusion.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**j. Re-Weatherization Eligibility**

The Commission made one clarification request regarding 2. Home Comfort, j. Re-Weatherization Eligibility, on page 44 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** As a general rule, PGW does not assign a property if it has been comprehensively treated within seven years. There are two exceptions for when a case can be treated twice in less than seven years:

Cases are designated as "limited" if they do not receive either air sealing, insulation or a heater replacement due to health and safety issues. If the customer resolves their health and safety issues that would allow for comprehensive weatherization, the contractor may return in less than seven years.

If a property is eligible for services from another agency and treatment could be coordinated, PGW has waived the seven-year rule.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**k. Continuation of Regulatory Waivers**

The Commission made one clarification request regarding 2. Home Comfort, j. Re-Weatherization Eligibility, on page 44 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** A continued waiver is requested for 58.5, which states that not more than 15% of a covered utility's annual budget for its usage reduction program may be spent on administrative costs.

The Home Comfort program's administrative expenses exceed the 15 percent cap for administrative charges because PGW's program design is based on industry standard TRC cost-effectiveness targets. These targets better serve the intent of this regulation (protection of rate-payer dollars) in a more effective manner than by strictly adhering to administrative cost caps.

The higher administrative costs support program delivery that assures high-quality installations with comprehensive energy-saving projects through program implementation activities such as:

- Requiring BPI (Building Performance Institute) certification for CSP staff performing in-home work to ensure top work quality and adherence to health and safety protocols.
- PGW requires energy audits to be performed at every house prior to a comprehensive project, and that the audit meets BPI standards.
- Computers and IT infrastructure to provide cost-effectiveness analysis that informs project design, and provide comprehensive, secure, reporting.
- Due to the health, safety and structural issues that can be aggravated by comprehensive weatherization, CSPs have an extensive screening process. As a result, communications, scheduling and related costs driven higher to support these activities.

PGW also requests a continued waiver for Section 58.11(a), which states that "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."

Consistent with current industry standards, PGW's Home Comfort program takes a "whole house" approach to weatherization under which it is more appropriate to evaluate the full job scope instead of individual measures. Instead of setting 7 or 12-year payback term per measure, PGW requires jobs to have a Total Resource Cost (TRC) benefit to cost ratio above 1.0 as a

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

measurement of cost-effectiveness. The TRC test recognizes the long-term benefits of gas weatherization measures, such as heating systems, air sealing and insulation that have lifetimes greater than 20 years. If the Commission were to discontinue the waiver, PGW would install insulation, air sealing and heating systems in far fewer homes and achieving far less in savings and home comfort.

PGW requests continued flexibility with these two waivers in order to keep the program current in the weatherization industry that has evolved, and is constantly evolving. The industry has changed from replacing individual weatherization measures to a “whole home” approach, and greater certifications and technical skills are needed, and new conservation measures and technologies are being added.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**B. 4. Hardship Fund**

The Commission made one clarification requests regarding 4. Hardship Fund, on pages 48 of the Order. PGW's responses are as follows:

***Request: 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).***

**PGW Response:** There will be no required action on the customer's behalf. At the start of the pilot, all customers who submit an application for CRP and are deemed no longer eligible due to exceeding the income guidelines AND are within 250% of the FPL, will receive a grant between \$200 and \$750 on a first-come, first-served basis. At the time of removal from CRP, if the balance is greater than \$200, the customer will receive the amount of the balance, up to \$750. If the balance is less than \$200, the customer will receive \$200.

Additionally, all PFA holders who contact PGW after the start of the pilot AND have an income of 250% of the FPL, will automatically receive a grant as outlined above on a first-come, first-served basis. If the balance is greater than \$200, the customer will receive the amount of the balance, up to \$750. If the balance is less than \$200, the customer will receive \$200.

Grants will be distributed on a first-come, first-served basis until funds are exhausted.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**C. Projected Needs Assessments**

The Commission made one clarification requests regarding C. Projected Needs Assessments, on pages 49 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** To estimate the number of accounts of customers in low-income households found in Table 2, PGW uses the spreadsheet *Household Poverty - PA & Cnty (2015-2019) (03-15-2021)*, provided by Pennsylvania State University as instructed by the PA PUC. This source uses census data and includes an estimate of the percent of households below 150% of the poverty level. The reported value is 40.09 percent.

PGW applied the 40.09 percent figure to the average monthly number of residential households in PGW's customer database that have gas service. In 2020, PGW had an average of 486,934 residential customers per month. Therefore, the estimated number of low-income residential households is 195,212 (486,934 x 40.09 %).

The 121,496 estimated low-income customers referenced on page 9 is calculated using the 2015-2019 Census 5-year estimates for Philadelphia. The Census identifies a total low-income household count of 137,806 households, with 121,496 of those being gas heating households and 16,310 being non-heating.

The Census figure of 121,496 is the most accurate figure showing low-income status. This is because it considers income levels from the reputable source of the Census. While PGW maintains data on customers who participate in CRP and LIHEAP, PGW does not know incomes of customers who meet low-income requirements and do not participate in those programs but could in the future.

PGW then took the 121,496 figures for low-income population, and further calculated the number of potential LIURP households based on existing program data on participation rates, valid data and renters.

**PGW Response to June 16, 2022 Order Directing Supplemental Information re PGW's Proposed 2023-2027 Universal Service and Energy Conservation Plan (Proposed 2023 USECP)**

**E. Program Budgets**

The Commission made one clarification requests regarding E. Program Budgets, on pages 51 of the Order. PGW's responses are as follows:

***Request: 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.***

**PGW Response:** The average number of customers served for calendar year 2021 in each of the categories are:

Residential	491,045
Commercial	24,104
Industrial	578
Municipal	859
Philadelphia Housing Authority	1,020