


COMMONWEALTH OF PENNSYLVANIA



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August 1, 2022

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

Re: Peoples Natural Gas Company 2019-2024 USECP
Docket No. M-2018-3003177
Peoples Gas Company 2019-2024 USECP
Docket No. M-2020-3021343
Amendment to Peoples Natural Gas Company
2015-2018 USECP
Docket No. P-2020-3017641
Peoples Natural Gas 2015-2018 USECP
Docket No. M-2014-2432515

Dear Secretary Chiavetta:

On July 20, 2022, Peoples Natural Gas Company LLC and Peoples Gas Company LLC (Peoples) filed its Petition for Reconsideration from Action of the Staff related to the Commission Order dated June 7, 2022 and the Executive Secretary Letter dated June 30th (Petition). On May 12, 2022, the Commission entered an Order directing Peoples to submit a revised 2019-2024 Universal Service and Energy Conservation Plan (USECP) within 30 days of the May 12 Order. On June 13, 2022, Peoples filed clean and red-lined versions of the revised 2019-2024 USECP. On June 30, 2022, the Commission issued a Secretarial Letter identifying three areas of the revised 2019-2024 that were inconsistent with the May 12 Order: (1) the timeline for implementation of a paper CAP application; (2) the timeline for implementation of the changes to the CAP final bill; and (3) the timeline for implementation of elimination of the pre-CAP \$5 co-pay for arrearage forgiveness. Petition at ¶¶ 12-17.

In its Petition, Peoples requests extensions for implementation of the three directives from the Commission. Specifically, regarding the timeline for development of a paper CAP application, Peoples identified that pursuant to the May 12, 2022 Order the paper application needed to be completed by October 1. Petition at ¶12. Peoples' stated that they believed that the October 1 date was consistent with the May 12, 2022 Order and requested clarification that implementation by October 1 was acceptable. Petition at ¶¶ 13, 17. Peoples identified that the Company would need to work with Dollar Energy and will need to identify pathways for customers to obtain the

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application, ensure that the application meets plain language standards, and to receive input from the Company's Universal Services Advisory Group (USAG) about the CAP application. Petition at ¶¶ 14-16.

Regarding the CAP final bill changes, the May 12 Order required implementation within 90 days. Petition at ¶ 18. Peoples' compliance USECP provided a proposed timeline of March 31, 2023. Petition at ¶ 19. In its Petition, Peoples identified that significant IT changes would be required to implement the CAP final bill changes. Petition at ¶¶ 20-21. In the interim since its compliance USECP filing, Peoples worked with IT and determined that the Company can implement the changes by December 1, 2022. Petition at ¶ 21. Peoples requested reconsideration of the 90 day timeline until December 1, 2022 to implement the CAP final bill changes. Petition at ¶ 22.

Finally, regarding the pre-CAP \$5 co-pay elimination, the May 12 Order provided that the changes should be implemented within 90 days. Petition at ¶ 23. Peoples' compliance USECP provided that the implementation would occur by March 31, 2023. Petition at ¶ 24. In its Petition, Peoples identified that significant IT changes and testing would be required to implement the change. Petition at ¶¶ 25-26. Peoples requested reconsideration of the timeline until March 31, 2023. Petition at ¶ 27. Peoples provided that the Company would submit routine updates about the status of implementation. Petition at ¶ 27.

The OCA does not oppose Peoples' request for additional time to implement the changes to the timelines for implementation of the paper CAP application, changes to the CAP final bill, and elimination of the pre-CAP \$5 co-pay. The OCA has discussed the Petition with both Peoples and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA). It is the OCA's understanding that CAUSE-PA will be filing today an Answer that will request that Peoples issue a credit for any pre-program arrearage (PPA) co-payment charged to CAP customers after August 10, 2022, the original deadline for elimination of the \$5 co-payment for a maximum of \$35. The credit is estimated to be approximately \$35 (\$5 x 7 months) based upon Peoples' proposed March 31, 2023 timeline. The credit would be applied following the elimination of the \$5 co-payment. As the Answer will indicate, the OCA supports the proposed request to credit CAP customers for the \$5 co-pay amounts paid beyond August 10, 2022.

Respectfully submitted,

/s/ Christy M. Appleby

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Certificate of Service

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter Re: In Lieu of an Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 1st day of August 2022.

SERVICE BY E-MAIL ONLY

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