

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2018-2647577
	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

DIRECT TESTIMONY OF MITCHELL MILLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

June 6, 2018

1 **PREPARED DIRECT TESTIMONY OF MITCHELL MILLER**

2 **Q: Please state your name, occupation and business address.**

3 A: Mitchell Miller. I currently provide consulting services regarding utility programs that
4 promote the public interest with a focus on low income households. My address is 60 Geisel
5 Road, Harrisburg, PA 17112.

6 **Q: Briefly outline your education and professional background.**

7 A: As my attached resume shows, I received my B.S. Degree in Community Development
8 from Pennsylvania State University, where I graduated *cum laude* in 1974, and a M.A degree in
9 Public Administration from Shippensburg University in 1984. I have over 35 years of experience
10 in the development, implementation, and evaluation of program design for residential utility
11 consumers. The focus of my work has concerned education, energy efficiency, credit and
12 collections, and customer assistance programs.

13 After serving as a research analyst at both the Pennsylvania Governors Action Center and
14 the Pennsylvania Public Utility Commission (“Commission”), I was appointed Chief of the
15 Commission’s Division of Research and Planning in 1978 and, in 1992, I was designated as the
16 Director of the Bureau of Consumer Services, where I served until my retirement from the
17 Commission in 2009.

18 Following my retirement from the Commission in 2009, I served for over three years as a
19 consultant to the Pennsylvania Department of Community and Economic Development (“DCED”)
20 on weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program
21 (WAP). My resume is attached as Appendix A.

1 **Q: Please describe the focus of your work over the past thirty-five years.**

2 A: During my tenure at the Commission, I was primarily engaged in activities relating to
3 regulatory policy involving residential customer service, complaint handling, credit and
4 collections, and universal service, including customer assistance programs and low-income energy
5 efficiency and conservation. The Bureau of Consumer Services has regulatory authority and
6 responsibility for policy development for all areas of consumer services including resolving
7 consumer complaints and problems, enforcing consumer regulations, developing, implementing
8 and evaluating programs involving complaint handling, complaint analysis, collections,
9 enforcement of consumer regulations, utility customer assistance programs and low income
10 conservation. My focus at DCED was the creation of a performance-based Weatherization
11 Assistance Program system, dedicated to a high standard of quality, compliance and production.

12 **Q: What is your relevant experience on issues of low-income utility affordability?**

13 A: During my tenure, the Commission emerged as a national leader in research, development,
14 and oversight of programs addressing credit and collection issues affecting low-income utility
15 consumers. I was responsible for evaluating utility and Commission customer service programs,
16 identifying problems and making recommendations for change. These activities led to the
17 recognition of the need for development of integrated programs for low income consumers. As
18 director of BCS, I was responsible for the development, oversight, and monitoring of the initial
19 pilot and then the statutorily required low-income Universal Service Programs. Each of these
20 programs is structured to provide a different form of assistance to low-income customers to enable
21 those customers to afford and maintain basic service. For example, the Customer Assistance
22 Program (CAP) provides alternatives to traditional collection methods for low income, payment
23 troubled utility customers, and the Low Income Usage Reduction Program (“LIURP”) is a targeted

1 weatherization program designed to assist low-income households with the highest energy
2 consumption, payment problems, and arrearages. These programs work in tandem and are
3 designed to assist low-income households have affordable utility services and safe living
4 environments while reducing utility collection and therefore benefitting other ratepayers.

5 As director of BCS, I supervised the review and determination of thousands of low-income
6 consumer complaints and inquiries as well as the reviews of utility performance at handling these
7 customer complaints and payment arrangement requests.

8 I directed the creation, development, and evaluation of the effectiveness and the expansion
9 of the Universal Service Programs in Pennsylvania that are targeted toward low-income
10 households. These programs included CAP and LIURP, as well as the Customer Assistance
11 Referral Evaluation program (CARES) and utility-funded hardship funds. Since the programs'
12 inception, followed by the passage of the Electricity Generation and the Natural Gas Customer
13 Choice and Competition Acts, which required that the Commission ensure that universal service
14 and energy conservation services are appropriately funded and available in each utility distribution
15 territory, until about the time of my retirement in 2009, the Bureau of Consumer Services was
16 responsible for Commission oversight of these programs.

17 Further, upon my retirement from the Commission, I served as a consultant on
18 weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program
19 (WAP) at DCED. I was instrumental in transforming the WAP program by creating a
20 performance-based system, dedicated to a high standard of quality, compliance and production.
21 Innovations included introducing performance standards for production, quality and compliance
22 and independent state certification and training for all state WAP workers. I was also responsible
23 for coordinating DCED's WAP program with the Commission's LIURP and Act 129 low-income

1 programs. I also served as a policy consultant for the Philadelphia Water Department from 2013
2 to 2016. In this role, I provided consulting services to assist the Department to improve the
3 informal dispute and hearing process, and to develop deferred payment agreements.

4 I have participated at the National Association of Regulatory Utility Commissioners
5 (“NARUC”), the National Low Income Energy Consortium and the National Energy Utility
6 Affordability Conference meetings, and have presented numerous sessions related to low-income
7 utility affordability. Most recently, I served on the board of directors of the Keystone Energy
8 Efficiency Alliance (“KEEA”) and as co-chair of the KEEA annual conferences, and I am a current
9 member of the WAP Policy Advisory Council.

10 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

11 A: Yes. Below is a list of the proceedings in which I presented testimony, in reverse
12 chronological order.

- 13 • PECO Energy Company’s Pilot Plan for an Advance Payments Program and Temporary
- 14 Waiver of Portions of the Commissions Regulations, Docket No. P-2016-2573023
- 15 • Pa PUC v. UGI Penn Natural Gas, Inc., Docket R- 2016-2580030
- 16 • Pa. PUC v. Metropolitan Edison Company, Docket No. R-2016-2537349
- 17 • Pa. PUC v. Pennsylvania Electric Co., Docket No. R-2016-2537352
- 18 • Pa. PUC v. Pennsylvania Power Co., Docket No. R-2016-2537355
- 19 • Pa. PUC v. West Penn Power, Docket No. R-2016-2537953
- 20 • Pa. PUC v. UGI Utilities, Inc. – Gas Division, Docket No. R-2015-2518438
- 21 • Petition of Duquesne Light for Approval its Act 129 Phase III Energy Efficiency and
- 22 Conservation Plan, Docket No. M-2015-2515375
- 23 • Petition of PECO Energy Co. for Approval its Act 129 Phase III Energy Efficiency and
- 24 Conservation Plan, Docket No. M-2015-2515619
- 25 • Consolidated Petition of First Energy Companies for Approval its Act 129 Phase III
- 26 Energy Efficiency and Conservation Plan, Docket Nos. M-2015-2514767, -2514768, -
- 27 2514769, 2514772
- 28 • Petition of Philadelphia Gas Works for Approval of its Phase II Demand Side
- 29 Management Plan, Docket No. P-2014-2459362
- 30 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2015-2468056

- 1 • Pa. PUC v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275
- 2 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2014-2406274
- 3 • Verizon Pa., LLC, and Verizon North, LLC, Petition for Competitive Classification,
- 4 Docket Nos. P-2014-2446303, P-2014-2446304
- 5 • Petition of PECO Energy Co. for Approval its Act 129 Phase II Energy Efficiency and
- 6 Conservation Plan, Docket No. M-2012-2333992
- 7 • Petition of PECO Energy Co. for Approval of its Default Service Program II, Docket No.
- 8 P-2012-2283641
- 9 • Petition of PECO Energy Co. for Approval of its Universal Service and Energy
- 10 Conservation Plan, Docket No. M-2012-2290911.

11 **Q: Have you provided litigation support for the Commission?**

12 A: Although I did not testify in any proceeding during my tenure at the Commission, I directed
13 the Bureau's activities in policy development, as well as enforcement litigation to ensure
14 compliance with customer service regulations and statutes.

15 **Q: For whom are you testifying in this proceeding?**

16 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
17 Efficiency in Pennsylvania ("CAUSE-PA").

18 **Q: What is the purpose of your testimony?**

19 A: CAUSE-PA intervened in this proceeding to ensure that the proposed rate increase and rate
20 design will not adversely affect Columbia's low-income customers' ability to connect to, maintain,
21 and afford natural gas service, which is essential for heating, cooking, and hot water – all critical
22 components to a safe and healthy home.

23 **Q: How is your testimony organized?**

24 A: My testimony is divided into six sections. In the first section, I discuss the financial impact
25 that Columbia's proposed residential rate increase will have on Columbia's low income ratepayers.
26 As I explain, an estimated one quarter (25.7%) of Columbia's residential customer class are low
27 income – meaning their total gross household income is at or below 150% of the federal poverty

1 level (FPL).¹ These households already struggle to pay for basic life necessities. Increasing the
2 cost of natural gas service, essential to cooking and heating, will worsen the affordability gap for
3 thousands of Columbia’s consumers. It is both unjust and unreasonable to charge rates which could
4 force families to do without a service that is essential to meet basic human needs. As I discuss in
5 detail, while some help is available to assist vulnerable households, current universal service
6 program structure and funding are insufficient to lessen the affordability gap for the majority of
7 Columbia’s low income customers. Consequently, before any rate increase is approved, more must
8 be done to improve available rate relief for low income households.

9 In section II, I discuss Columbia’s proposed rate design, which seeks to recover an
10 increased portion of the residential cost of service through a fixed monthly customer charge.
11 Recovery of customer costs through a fixed charge undermines energy efficiency efforts, and
12 deprives households of the ability to gain economic savings through adoption of energy efficient
13 products and practices. To the extent that any of the proposed rate increase is found to be just and
14 reasonable, I believe that the entirety of any resulting rate increase should be added to the
15 volumetric charge, and not the fixed charge portion of the bill.

16 Next, in Section III, I will address Columbia’s proposed Revenue Normalization Rider
17 (Rider RNA), and the likely impact of this alternative ratemaking design on low income ratepayers.
18 In short, like the high fixed charge, Rider RNA would likely undermine efforts by residential
19 consumers to reduce bills through energy efficiency and conservation efforts. Given that other
20 rate structures are available that do not have the same impact, Rider RNA should be disallowed.

¹ Appendix B, CAUSE-PA to CPA 1-012; see also Pa. PUC, BCS, 2016 Report on Universal Service Programs and Collections Performance, at 8 (2017), http://www.puc.state.pa.us/filing_resources/universal_service_reports.aspx (hereinafter 2016 Universal Service Report).

1 In section IV, I assess the effectiveness of Columbia’s Universal Service and Energy
2 Conservation programming to determine whether the programs are adequately designed, funded,
3 and administered to offset the impact of increased rates on Columbia’s low income customer
4 population. As I conclude therein, critical changes are necessary to Columbia’s CAP and LIURP
5 programs to adequately shield vulnerable consumers from the financial impact of any approved
6 rate increase.

7 In section V, I will briefly discuss several of Columbia’s policies which impact quality of
8 service. Specifically, I will address Columbia’s medical certificate and security deposit policies,
9 as well as its policy for handling accounts for customers with a Protection From Abuse Order or
10 other court order evidencing domestic violence.

11 Finally, in Section VI, I will summarize the recommendations and proposals which I
12 provided throughout my direct testimony.

13 **I. RATE INCREASE**

14 **Q: What is the estimated financial impact of Columbia’s proposed rate increase on the**
15 **residential customer class?**

16 A: Columbia’s proposed rate increase for residential customers ranges, depending on usage,
17 from 8.96% to 9.02%.² The bill for a residential household using an average of 80 therms will
18 increase from \$102.33 to \$111.55 – or \$9.22 per month.³

² See CPA Exhibit 111, Schedule 6, at 1; see also CPA St. No. 12, Strauss, at 25:11-12.

³ Id.

1 **Q: How many low income customers does Columbia have?**

2 A: In March 2018, Columbia had approximately 393,938 residential customers, one quarter
3 of whom – 101,375 or 25.7% – are estimated to have total gross household income that is at or
4 below 150% of the federal poverty level (FPL).⁴ In 2018, a family of three meets this standard if
5 their total gross household income is less than \$30,630. Of this estimated number, Columbia
6 confirmed that, as of December 2017, 17.3% (67,659) of its total residential customer base did, in
7 fact, have total household income less than this threshold.⁵

8 **Q: How would the proposed rate increase impact low income households?**

9 A: The simple reality for all low income households is that they struggle to make ends meet
10 each month. Any increase in costs for essential services, like natural gas, cause households to
11 juggle expenses, trim expenditures, and forgo necessities. Given this, the proposed rate increase
12 of \$9 per month – while perhaps trivial to upper income households – would negatively impact the
13 ability of low income households to connect, maintain, and afford Columbia’s natural gas service.
14 Thus, a key component in determining if a proposed rate is just and reasonable is to measure its
15 effect on rate affordability. To assess rate affordability, it is helpful to look at the percentage of
16 income which a household should reasonably be required to spend to afford heating, cooking, and
17 hot water service. This is otherwise known as a household’s energy burden.

18 The federal Department of Housing and Urban Development estimates that a household’s
19 total housing costs should account for no more than 30% of the household’s total income.⁶ But

⁴ Appendix B, CAUSE-PA to CPA 1-012.

⁵ Appendix B, CAUSE-PA to CPA 1-007. To be confirmed low income, a customer must either be enrolled in a low income program or self-identify as low income.

⁶ US Dep’t of Housing & Urban Development, Affordable Housing, https://www.hud.gov/program_offices/comm_planning/affordablehousing (“Families who pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care.”).

1 across Pennsylvania, many low income household pay up to 30% of their income on energy costs
2 alone.⁷ In comparison, the average energy burden of higher income households is roughly 3%.⁸

3 The overwhelming energy burden on low income households makes it difficult for them to
4 pay for other basic necessities such as housing, food, and medicine; can threaten stable and
5 continued employment and education; can have substantial and long-term impacts on mental and
6 physical health, and can create serious public safety risks.⁹ These impacts can have a particularly
7 harmful impact on child development.¹⁰ As researchers have repeatedly found, families that
8 cannot afford energy services often go without food, medicine, healthcare, and other basic life
9 necessities in order to afford the costs of energy.¹¹

10 A benchmark often used to assess affordability in Pennsylvania is the Self Sufficiency
11 Standard, published periodically by the nonprofit Pathways PA.¹² The Self Sufficiency Standard
12 is a tool that measures the income that a family must earn to meet their basic needs. It is calculated
13 by finding the costs of 6 basic needs - housing, child care, food, health care, transportation, and
14 taxes - without the help of public subsidies. Unlike the federal poverty level, which does not
15 change based on geographic location or family composition, the Self Sufficiency Standard
16 accounts for the varied costs of these 6 basic needs in different geographical areas and for different

⁷ See Fisher, Sheehan & Colton, The Home Energy Affordability Gap: Pennsylvania (April 2017),
http://www.homeenergyaffordabilitygap.com/03a_affordabilityData.html.

⁸ Diana Hernandez, Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change, 103(4) Am. J. Pub. Health (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

⁹ NEADA, 2011 National Energy Assistance Survey (Nov. 2011), <http://www.neada.org/news/nov012011.html>;
Ariel Dreobl & Lauren Ross, ACEEE, Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities, at 13 (April 2016), <http://aceee.org/research-report/ul602>

¹⁰ Id.

¹¹ See id.

¹² PathWays PA, 2012-2013 Pennsylvania Sufficiency Standard,
http://www.selfsufficiencystandard.org/docs/PA2012_Web_101112.pdf.

1 aged household members.¹³ The average Self Sufficiency Standard for the Columbia Gas service
2 territory for a family of four (two adults, one preschool age child, and one school-age child) is
3 \$50,435.¹⁴ In comparison, a family of four living at 150% of the poverty level has an income of
4 just \$36,900, much less than is necessary to meet basic needs.

5 An increase in rates for basic necessities, including natural gas for heating, cooking, and
6 hot water, will necessarily result in increased unaffordability and a corresponding increased rate
7 of service termination.

8 **Q: Is there any other evidence that low income customers do not have sufficient income**
9 **to pay for home energy costs, and therefore cannot afford to absorb the additional rate**
10 **increase proposed by Columbia?**

11 A: Yes. An alarmingly high percentage of Columbia's payment troubled residential customers
12 are low income. In 2016, 65% of Columbia's payment troubled customers were confirmed low
13 income, and 66.3% of Columbia's payment arrangements were for confirmed low income
14 customers.¹⁵ Yet, as noted above, approximately 17.3% of Columbia's residential rate class are

¹³ Unlike the federal poverty level, the Self Sufficiency Standard accounts for geographical area and varies according to the cost generated by children at various ages. The federal poverty level does not account for these important variances, and thus does not produce an accurate picture of the expenses families face in meeting their basic and essential needs. Id. at 6.

¹⁴ This figure is an average of the self-sufficiency standard in each of the counties served by Columbia: Adams, \$53,708; Allegheny, \$54,275; Armstrong, \$48,816; Beaver, \$49,987; Bedford, \$44,173; Butler, \$53,088; Centre, \$60,669; Chester, \$73,992; Clarion, \$46,720; Clearfield, \$46,250; Elk, \$45,868; Fayette, \$48,983; Franklin, \$48,475; Fulton, \$46,392; Greene, \$50,541; Indiana, \$49,156; Jefferson, \$42,380; Lawrence, \$52,579; McKean, \$45,348; Mercer, \$52,284; Somerset, \$42,407; Venango, \$51,521; Warren, \$43,755; Washington, \$53,940; Westmoreland, \$51,700; York, \$54,300. See PathWays PA & Center for Women's Welfare, Self-Sufficiency Standard for Pennsylvania Tables by County, All Family Types (2012), <http://www.selfsufficiencystandard.org/pubs.html> (click on Pennsylvania, and Tables by County).

¹⁵ 2016 Universal Service Report at 9-10.

1 confirmed low income. In other words, Columbia's *confirmed* low income population accounts
2 for roughly one-fifth of the residential population, but carries two-thirds of the debt.

3 **Q: Do you believe that there is an increased threat of termination for low income**
4 **customers as a result of the proposed rate increase?**

5 A: Yes. Low income customers already have a markedly higher rate of involuntary, payment-
6 based termination compared to average residential customers. In 2016, Columbia's residential
7 termination rate was 2.5%, compared to 8.8% for confirmed low income customers.¹⁶

8 Enrollment in Columbia's Customer Assistance Plan (CAP) helps to reduce the termination
9 rate for low income households; however, as I address in further detail below, even those enrolled
10 in CAP are still often unable to afford energy services. In 2017, 813 CAP customers were
11 terminated for non-payment.¹⁷ This equates to a roughly 4% CAP termination rate.¹⁸ While lower
12 than the 8.8% confirmed low income customer termination rate, is still significantly higher than
13 the 2.5% termination rate for all residential customers.

14 Evidence further suggests that once disconnected, low income customers are often unable
15 to reconnect service, and may go for extensive periods of time before restoration. In 2016,
16 Columbia terminated 6,030 confirmed low income customers, but reconnected just 2,753.¹⁹

¹⁶ 2016 Universal Service Report at 12, 13.

¹⁷ Appendix B, CAUSE-PA to CPA 1-014.

¹⁸ See Appendix B, CAUSE-PA to CPA 1-008. In December 2017, Columbia's total CAP enrollment was 19,999.
Id.

¹⁹ 2016 Universal Service Report at 11, 16. Columbia was asked in discovery to identify the length of time that confirmed low-income customers remained without service after termination, but asserted in response that it was unable to provide the requested information because it does track whether and when a customer reconnects their service. Appendix B, CAUSE-PA to CPA 1-015, 1-017, 1-019.

1 **Q: How does the loss of natural gas service impact a household?**

2 Loss of natural gas service can and does have a deep and lasting impact on the health and
3 wellbeing of the entire household – as well as the community as a whole.

4 When a family is unable to use a primary heating system, they often resort to dangerous,
5 high usage / high cost heating methods – such as electric space-heaters, electric stoves, and/or
6 portable generators – which increases the risk of carbon monoxide poisoning and house fires.²⁰
7 The Commission has consistently documented this in its annual Cold Weather Survey. The 2017,
8 Columbia reported that it knew of at least 828 households in its service territory that were without
9 a central heating source in the wintertime – 211 of which it knew to be potentially using an unsafe
10 heating alternative.²¹ It is important to note that the annual Cold Weather Survey does not track
11 customers who were terminated in years’ past were unable to restore service – it only tracks
12 customers which were terminated in the year the survey is conducted. Thus, the number of
13 individuals without an operational central heating system is could very well be significantly higher.

14 Additionally, loss of essential utility service is also a common catalyst to homelessness,²²
15 which ultimately causes communities to expend an even greater level of resources to adequately
16 address homelessness and protect the safety of its community members.

²⁰ “Space heaters accounted for 33% of 2007-2011 reported home heating fires, 81% of home heating fire civilian deaths, 70% of home heating fire civilian injuries, and 51% of home heating fire direct property damage.” Nat’l Fire Protection Ass’n, Fire Analysis & Research Division, *Home Fires Involving Heating Equipment*, at ix & 33 (Oct. 2013).

²¹ Pa. PUC, 2016 & 2017 Cold Weather Survey Results – Gas,
http://www.puc.state.pa.us/General/publications_reports/pdf/Cold_Weather_Results_2017.pdf.
http://www.puc.pa.gov/general/publications_reports/pdf/Cold_Weather_Results_2014-2.pdf.

²² See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, *Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report* (2016), <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>.

1 **Q: Are customers currently enrolled in the Columbia’s CAP shielded from the financial**
2 **impact of the rate increase?**

3 A: Some, but not all. While Columbia witness Paula A. Strauss states in her direct testimony
4 that “Columbia anticipates that current CAP customers will not receive an increase in their
5 required payment,”²³ her conclusion is inaccurate. As Columbia acknowledged this inaccuracy in
6 response to subsequent interrogatories.²⁴ In fact, 44% of Columbia’s current CAP customers will
7 experience a rate increase if Columbia’s proposal is approved. Whether and the extent to which a
8 current CAP customer will experience a rate increase depends on the CAP customer’s payment
9 plan. Columbia’s CAP has five different payment plans: percent of income; average payments,
10 percent of bill, minimum payment, and Senior CAP.²⁵ The applicable payment plan is selected
11 upon enrollment, and is reevaluated only upon recertification.²⁶ Current CAP customers are
12 shielded from the proposed increase *only* if they are enrolled in Columbia’s percentage of income,
13 average payment, or minimum payment plans, which are based on household income and/or past
14 payment history – not tariff rates or future payments. As of December 2017, approximately 44%
15 of Columbia’s current CAP customers were enrolled in the percent of bill or Senior CAP plans.²⁷
16 Those enrolled in the percent of bill plan are charged a flat rate of 50% of their budget bill, and
17 those enrolled in the Senior CAP are charged a flat rate of 75% of their budget bill.²⁸ The budget

²³ CPA St. 12, Strauss, at 21:9-12 (emphasis added).

²⁴ Appendix B, CAUSE-PA to CPA 1-001.

²⁵ Columbia Gas of Pa., Inc., Universal Service and Energy Conservation Plan: 2015-2017, Docket No. M-2014-2424462, at 17 (2015) (hereinafter 2015-2017 USECP); see also Columbia Gas of Pa., Inc., Universal Service and Energy Conservation Plan: 2019-2021, at 20 (filed with the Commission on Feb. 1, 2018) (hereinafter 2019-2021 USECP).

²⁶ Id.

²⁷ Appendix B, CAUSE-PA to CPA 1-008.

²⁸ Id.

1 bill rate for these customers and their applicable discount is adjusted annually.²⁹ Thus, customers
2 enrolled in the percent of bill plan will be charged half (50%) of any approved increase when the
3 annual budget adjustment is made. As of December 2017, 8,764 (44%) of Columbia’s CAP
4 customers were enrolled in the percent of bill plan.³⁰ This is the highest enrollment level of all the
5 available payment plans. Those enrolled in the Senior CAP will also be charged an amount
6 proportionate to their discount, though just 5 customers were enrolled in Senior CAP as of
7 December 2017.³¹

8 **Q: Are any other CAP customer groups likely to experience higher costs because of the**
9 **rate increase?**

10 A: Yes. In addition to impacting the percentage of bill and Senior CAP payment plans, those
11 who enroll in the CAP average payment plan *after* the rate increase takes effect are likely to also
12 experience a rate increase. The average payment plan charges CAP customers the average of
13 payments made for the last 12 months prior to joining CAP. After the rate increase takes effect,
14 those seeking to enroll in CAP are likely to have made higher payments toward their increased
15 bill. If they then enroll in CAP, their historical average payments will be higher, as will their
16 assessed CAP payment.

17 **Q: For those CAP customers who may not be directly affected by the rate increase, is**
18 **there nonetheless an impact to the costs of the CAP program?**

19 A: Yes. The cost of CAP – that portion of the CAP bill that the CAP customer does not pay
20 – is paid for by non-CAP residential ratepayers. If costs increase because of the rate case, these

²⁹ See Appendix B, CAUSE-PA to CPA 1-001.

³⁰ Appendix B, CAUSE-PA to CPA 1-008.

³¹ Appendix B, CAUSE-PA to CPA 1-008.

1 costs are paid for either by CAP customers, non-CAP residential customers, or both – depending
2 on payment plan type, as discussed above. Thus, the estimated 70% of Columbia’s low income
3 customers who are not enrolled in CAP will have to absorb a portion of the increased CAP program
4 costs as a result of the rate increase through the universal service program rider.

5 **Q: Could low income customers simply enroll in CAP to protect themselves from the rate**
6 **increase?**

7 A: Enrollment in CAP would certainly help many customers to better afford natural gas
8 service, but – as outlined above – it would not shield all low income customers from the financial
9 impact of a rate increase. In December 2017, just 19,999 of Columbia’s 67,659 confirmed low
10 income customers were enrolled in CAP.³² In other words, about roughly 70% of confirmed low
11 income customers do not receive CAP assistance.

12 First, as I just explained above, Columbia’s CAP has five different payment plan options,
13 and several of those options will be impacted by the rate increase. So, enrollment in CAP does
14 not necessarily mean that a customer can escape the negative impact of a rate increase. When a
15 customer enrolls in CAP, the program administrator selects a plan for the customer which
16 “maximizes customer payments while maintaining affordability for the customer.”³³ This often
17 does not translate into the lowest payment option.³⁴ As discussed more fully in Section IV, the
18 administrator’s plan selection is not sufficiently monitored to determine whether the CAP rate plan
19 exceeds the tariff rate and/or the Commission’s affordability guidelines.

³² Appendix B, CAUSE-PA to CPA 1-008, 1-007.

³³ 2015-2017 USECP at 17.

³⁴ 2019-2021 USECP at 19.

1 Moreover, low income households face a number of barriers to CAP enrollment. Many are
2 unaware of or informed about the benefits available through CAP and/or are not referred to CAP
3 in a manner that allows the customer to understand the benefits of the program or the process to
4 enroll. Illustrative of this is the fact that in 2016, 12,294 of Columbia’s confirmed low income
5 customers are in debt to Columbia but have not availed themselves of the rate discount and debt
6 forgiveness available through the CAP program.³⁵

7 Many others are not enrolled in CAP because they do not meet the eligibility guidelines
8 for the program. Columbia’s CAP program terms require that customers be low income - below
9 150% of federal poverty - and “payment troubled,” which Columbia defines as having “a
10 termination notice and or at least one failed payment agreement within past 12 months, or
11 otherwise identified through cross utility referral and credit scoring.”³⁶ But many low income
12 households in need of rate relief do not meet this definition of payment troubled because they forgo
13 other basic necessities, including food, medication, child care, and transportation, to keep their
14 utility account current.³⁷ Still other households – while not strictly meeting the “low income”
15 definition for Columbia’s CAP – are nonetheless economically vulnerable and struggle to pay for
16 natural gas service.

17 Finally, it is critical to recognize that many who are enrolled in CAP are *already* – at current
18 rates – unable to afford natural gas service. As established above, non-low-income households
19 have an energy burden which is roughly 3% of their household income.³⁸ In comparison, the

³⁵ 2016 Universal Service Report at 17, 18.

³⁶ See 2015-2017 USECP at 17.

³⁷ Nat’l Low Income Energy Consortium, Paid but Unaffordable: The Consequences of Energy Poverty in Missouri – and Elsewhere (2004), http://www.neuac.org/2004_MO%20Overview.pdf.

³⁸ Diana Hernandez, Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change, 103(4) Am. J. Pub. Health (2013), <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

1 Commission’s CAP Policy Statement provides that, generally, CAP should produce a gas heating
2 energy burden up to 8% for households at 0-50% FPL and 10% for households at 51-150% FPL.³⁹
3 In practice, thousands of Columbia’s current CAP customers exceed the Commission’s energy
4 burden thresholds. In 2017, 2,217 CAP customers had an energy burden of 10% or more.⁴⁰ The
5 vast majority of CAP customers with excessive energy burdens – many approaching or exceeding
6 20% of their income – are Columbia’s poorest customers, those with income that is at or below
7 50% FPL.⁴¹ Of course, these customers cannot access a Commission-issued payment arrangement
8 if they fall behind on their bills.⁴²

9 Thus, for all of these reasons, enrollment in CAP will not necessarily allow customers to
10 escape the financial impact of the proposed rate increase. If Columbia’s rate increase were
11 approved, rate unaffordability will increase further, and CAP will become less effective at driving
12 affordability for those who participate.

13 **Q: Does LIHEAP mitigate the harm of the proposed rate increase on low income**
14 **households?**

15 A: No. Relative to need, there are few Columbia customers that receive LIHEAP assistance.
16 In the 2017-2018 LIHEAP program year, just 19,563 received a LIHEAP Cash and/or Crisis
17 grant.⁴³ This accounts for just 29% of Columbia’s *confirmed* low income customers and 19% of
18 Columbia’s *estimated* low income customers.⁴⁴ While LIHEAP is a critically important program

³⁹ 52 Pa. Code § 69.265. The threshold for combined gas and electric energy burden is permitted to go as high as 17%. See id.

⁴⁰ Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

⁴¹ Id.

⁴² See 66 Pa. C.S. § 1405(c) (“Customer assistance program rates shall be timely paid and shall not be the subject to payment arrangements negotiated or approved by the commission.”).

⁴³ Appendix B, CAUSE-PA to CPA 1-009.

⁴⁴ Appendix B, CAUSE-PA to CPA 1-007, 1-012 Attach. A.

1 and provides life-sustaining assistance to those in need, the cash grant is intended to provide only
2 supplemental assistance, and is not enough to mitigate the financial harm of a rate increase.
3 Furthermore, many Columbia customers have to designate their LIHEAP grant to their electric
4 provider as a secondary or supplemental heating source. As I noted above, the bill for a residential
5 household using an average of 80 therms will increase \$9.22 per month – or \$110.64/year.⁴⁵ The
6 average LIHEAP Cash Grant last year for natural gas service was \$242.⁴⁶ In other words, the
7 proposed increase would consume nearly half of the average household LIHEAP grant, leaving
8 little left over to offset the household’s annual heating costs.

9 **Q: Do you have any proposals that could help remediate the financial impact of**
10 **Columbia’s proposed rate increase on low income consumers?**

11 A: Yes. To the extent that any increase in rates is approved, I have a number of
12 recommendations to offset the stark financial impact on low income consumers. My
13 recommendations are more fully described in sections II-V, and are summarized in section VI. In
14 short, to the extent any increase is approved, I recommend that the increase be recovered
15 exclusively through the volumetric charge. As I discuss below, adding additional costs to the fixed
16 customer charge will have a disproportionate impact on low income households, and works to
17 undermine energy efficiency efforts. In turn, I recommend that Columbia’s proposed Revenue
18 Normalization Rider (Rider RNA) be disallowed, as this rate recovery tool undercuts the ability of
19 ratepayers to offset costs through the adoption of energy efficiency and usage reduction efforts
20 and the effectiveness of the Low Income Usage Reduction Program. These impacts can

⁴⁵ CPA Exhibit 111, Schedule 6, at 1; see also CPA St. No. 12, Strauss, at 25:11-12.

⁴⁶ Appendix C, Energy Assistance Summary (EASUM) prepared by the Pennsylvania Department of Human Services for the period of 9/16/2017 through 05/17/2018.

1 disproportionately harm low income ratepayers. Finally, I recommend a number of critical
2 changes to Columbia’s CAP and LIURP programs to ensure that the programs are more widely
3 available, adequately funded, and prudently designed to serve all those in need of assistance.

4 **II. RATE DESIGN**

5 **Q: Please describe Columbia’s residential rate design proposal.**

6 A: In relevant part, Columbia proposes to increase its Residential Customer Charge (fixed
7 charge) from \$16.75 to \$18.25 per month – a monthly increase of \$1.50.⁴⁷ Columbia’s fixed charge
8 is already \$2.00 higher than Pennsylvania’s seven large natural gas distribution companies.⁴⁸

9 **Q: Will CAP customers pay this increased Residential Customer Charge?**

10 A: Yes. As I explained above, approximately 44% (8,769) of Columbia’s current CAP
11 customers (those enrolled in the percent of bill and Senior CAP payment plans) would effectively
12 pay an additional \$0.75 each month (half of the proposed increase in the customer charge) – or
13 \$9.00 each year.⁴⁹

14 **Q: How would Columbia’s proposed rate design impact low income households?**

15 A: Increased fixed charges are uniquely harmful to low-income customers. Again, these
16 customers already struggle to pay their bills, most often without the assistance of CAP. Increasing
17 the costs recovered through a fixed charge – as opposed to a volumetric based charge – undermines

⁴⁷ CPA St. No. 12, Strauss, at 22:13-16.

⁴⁸ Peoples Natural Gas has a customer charge of \$14.75 (Supplement 90-Gas-Pa. PUC No. 45, at 3); NFG has a customer charge of \$12.00 (Supplement 192-Gas-Pa. PUC No. 9, at 3); PECO Gas has a customer charge of \$11.75 (Supplement 5-Gas- Pa. PUC No. 3, at 54); PGW has a customer charge of \$13.75 (Supplement 113-Gas-Pa. PUC No. 2, at 83); UGI Penn Natural Gas has a customer charge of \$13.75 (Supplement 9-Gas-Pa. PUC No. 9, at 69); UGI Gas has a customer charge of \$11.75 (Supplement 15-Gas-Pa. PUC No. 6, at 65).

⁴⁹ Id.; see also Appendix B, CAUSE-PA to CPA 1-008 (8,764 CAP customers were enrolled in the 50% of budget plan).

1 the ability for customers to reduce bills through conservation and consumption reduction. This is
2 particularly problematic for low-income customers, given that low income households have
3 significantly less budget elasticity than non-low-income households. By increasing the fixed
4 charge a residential customer must pay, without any link to customer's usage, Columbia
5 undermines the goals of the Low Income Usage Reduction Program (LIURP), which is designed
6 to lower consumption and increase energy affordability for low income customers. Given that low
7 income households are inherently payment troubled, it is critical that they continue to have access
8 to effective conservation tools capable of producing meaningful and lasting bill reductions. But
9 high fixed charges undermines available conservation tools, and contributes to persistent rate
10 unaffordability for low income customers.

11 **Q: Proponents of a higher fixed charge argue that the pricing structure is beneficial to**
12 **customers because the rates are easier to understand and provide enhanced predictability.**

13 **How do you respond?**

14 A: It may be the case that shifting cost recovery from a variable, volumetric-based rate to a
15 fixed charge will produce a more predictable bill that is perhaps easier to understand because there
16 is no calculation required to assess a fixed charge. This, however, assumes customers readily
17 scrutinize their bills for this level of detail, an assumption that I believe is dubious for
18 overwhelmed, time-strapped households struggling to pay their bills. Nonetheless, even if one
19 accepts the underlying premise, a simpler, more predictable bill only provides low income
20 customers with a meaningful benefit if it also produces an affordable bill. For CAP customers,
21 with bills structured and intended to be fixed at an affordable level, stability and predictability is a
22 meaningful budgeting tool. However, for low-income customers who are not enrolled in CAP,

1 bill stability of an already unaffordable bill will not, by virtue of stability alone, provide a benefit
2 to the customer.

3 A shift to a higher fixed customer charge will significantly reduce the ability to have
4 appreciable bill savings from May through November. For poor households, this is critical. As I
5 described above, poor households struggle on a monthly basis to pay all of their bills, often
6 choosing to forego food or medicine in order to keep service connected. Of course, without the
7 ability to offset costs through reduced usage, the effectiveness of LIURP at reducing energy costs
8 and reducing uncollectible expenses will also be thwarted, undermining the purpose of that
9 program and its ability to deliver meaningful savings to both the customers enrolled in the program
10 and the residential customers who finance the services.

11 **Q: To the extent a rate increase is approved, do you have any recommendations that**
12 **could help mitigate the effect of the proposed rate design on low-income households?**

13 A: Yes. For the reasons explained above, I recommend that to the extent any increase in the
14 residential rate is approved, it should be applied to the volumetric charge. Columbia's fixed
15 residential customer charge should not increase above its current level, which – as noted above –
16 is already \$2.00 higher than the other large Pennsylvania Natural Gas Distribution Companies.

17 **III. REVENUE NORMALIZATION ADJUSTMENT (RIDER RNA)**

18 **Q: Please summarize Columbia's proposal to implement a Revenue Normalization**
19 **Rider.**

20 A: The Revenue Normalization Adjustment Rider (Rider RNA) is designed to “adjust actual
21 non-gas distribution revenue for the non-CAP residential customer class.”⁵⁰ Essentially, Rider

⁵⁰ CPA St. 12, Strauss, at 9:14-15.

1 RNA would allow Columbia to collect its revenue on a per customer basis – rather than a per
2 usage basis.⁵¹ As proposed, Columbia would set monthly peak and off-peak benchmark
3 distribution revenues.⁵² Every 6 months, those benchmark distribution revenues would be used
4 to calculate the difference between the applicable benchmark distribution revenue and the actual
5 distribution revenue collected.⁵³ The difference between the applicable benchmark and actual
6 distribution revenue would then be collected from consumers in the following year through Rider
7 RNA.⁵⁴ For example, a peak period adjustment would be calculated at the end of the peak
8 period, and applied to residential bills during the following peak period.⁵⁵ Columbia proposes to
9 exclude CAP customers from the Rider RNA. Columbia’s witness, Paula Strauss, explained that
10 Columbia’s decision to exclude CAP customers was to avoid “unnecessary complexity to the
11 RNA” because “CAP customers’ payment are defined by their ability to pay.”⁵⁶

12 **Q: Do you support Columbia’s Rider RNA proposal?**

13 A: No. I believe that Columbia’s Rider RNA should be rejected. For the same reasons
14 discussed at length above in Section II with regard to the fixed charge, I oppose implementation
15 of Columbia’s Rider RNA. In short, and without unnecessarily repeating my arguments from
16 Section II, recovering revenue on a per customer basis, rather than a usage basis, strips low
17 income households of the ability to control their bill through usage reduction and conservation
18 efforts, and undermines the effectiveness of the Low Income Usage Reduction Program at
19 reducing low income customer bills. Moreover, the Rider RNA will require lower usage

⁵¹ CPA St. 12, Strauss, at 9:20-21.

⁵² CPA St. 12, Strauss, at 10-12.

⁵³ CPA St. 12, Strauss, at 10:9-12.

⁵⁴ CPA St. 12, Strauss, at 11:5-13.

⁵⁵ CPA St. 12, Strauss, at 11: 5-13.

⁵⁶ CPA St. 12, Strauss, at 19:6-8.

1 customers to subsidize higher usage customers because, again like the fixed charge, it will base
2 revenue recovery on a per customer basis, rather than on a per-unit of usage basis. As such, the
3 proposed Rider RNA is likely to have a disproportionately negative impact on low income
4 consumers.

5 Ms. Strauss argues in her direct testimony that because the revenue adjustment is applied
6 in the following year, the Rider RNA will “allow customers to experience any benefit from
7 controlling their usage and conserving.”⁵⁷ This statement is misleading. While it may appear to
8 the consumer that they have successfully reduced their energy costs over the short term, the
9 practical effect of the Rider RNA will be to charge the consumer the difference on the back end –
10 six months to a year after the consumer “experiences” the benefit of energy conservation efforts.
11 This is inappropriate and undermines a consumer’s efforts at conservation or through energy
12 efficiency investments after-the-fact. As such, I believe it should be disallowed.

13 Columbia’s decision to exclude CAP customers does not remediate my concern that
14 Rider RNA will negatively impact low income consumers and will undermine the effectiveness
15 of LIURP at reducing customer bills. As I have previously explained, roughly 70% of
16 Columbia’s confirmed low income customers are not enrolled in CAP. These consumers will
17 not be shielded from the impact of Rider RNA, and – as addressed above - it is not practical to
18 conclude that these consumers will simply be able to enroll in CAP to avoid the Rider RNA.

⁵⁷ CPA St. 12, Strauss, at 18:11-16.

1 **Q: If Rider RNA were approved, do you have any recommendations to mitigate the**
2 **impact on low income customers?**

3 A: Yes. If Rider RNA is ultimately approved, Columbia should be required to exempt all
4 confirmed low income customers from the charge.

5 **IV. UNIVERSAL SERVICE PROGRAMS**

6 **Q: Please explain how this section of your testimony is organized.**

7 A: I will assess and offer recommendations for each of Columbia's Universal Service
8 Programs to offset the impact of the rate increase on low income populations. As explained above,
9 rates are not just or reasonable when they exacerbate unaffordability for an estimated one quarter
10 of the residential population. Thus, to the extent any rate increase is approved, changes to
11 Columbia's universal service programs must be made to ensure that universal service
12 programming is sufficiently robust to handle increased need as a result of a rate increase.

13 **Customer Assistance Program**

14 **Q: Is Columbia's CAP adequately designed and implemented to remediate the impact of**
15 **the proposed rate increase on low income households?**

16 A: No, it is not. I have two primary concerns with Columbia's CAP, which lead me to
17 conclude that its CAP is insufficiently designed to remediate the financial impact of a rate increase.
18 First, Columbia's CAP enrollment has not kept pace with demonstrated need. Columbia must
19 enhance its enrollment and retention policies and procedures to ensure that CAP is accessible and
20 able to absorb the increased need which is likely to result if Columbia's proposed rate increase is
21 approved. Second, Columbia's CAP is often not delivering an affordable bill. This is due in large
22 part to Columbia's payment plan assessment procedure and its imposition of CAP Plus, an

1 additional monthly fee levied on CAP customers above and beyond the Commission’s established
 2 energy burden targets. Again, changes must be made to ensure that CAP is able to address the
 3 increased need to ensure that all households in Columbia’s service territory are able to access
 4 stable and affordable utility service.

5 CAP Enrollment

6 **Q: Please elaborate on your concerns about Columbia’s CAP enrollment.**

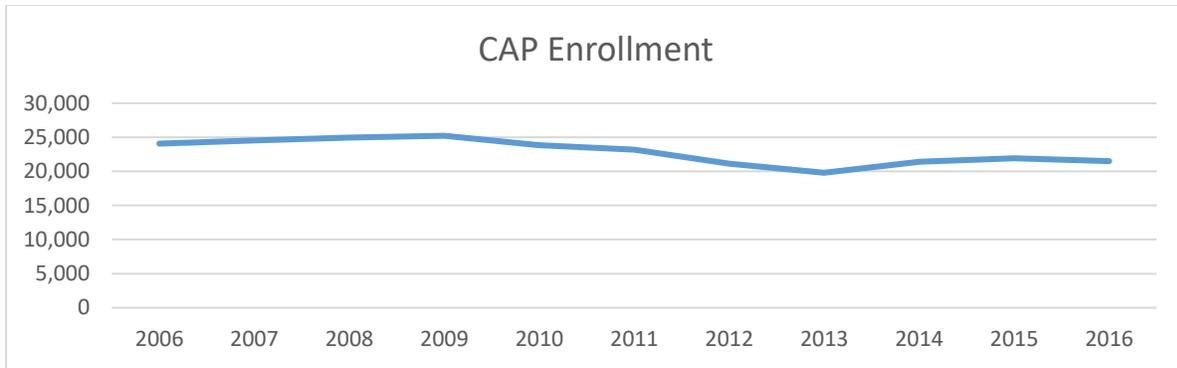
7 A: Over the last decade, Columbia’s CAP enrollment has been largely stagnant, and has in
 8 fact eroded slowly over time, despite significant and persistent need for energy assistance in
 9 Columbia’s service territory. Yet Columbia’s residential customer class has grown larger over the
 10 same period.

11 **Residential Customer Count vs. Annual CAP Enrollment⁵⁸**

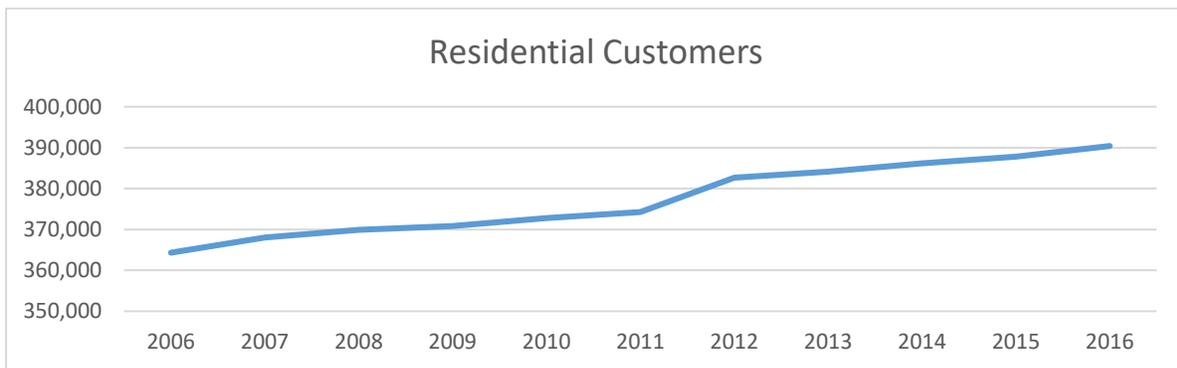
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Residential Customers	364,309	368,019	369,922	370,838	372,751	374,275	382,677	384,213	386,150	387,782	390,394
CAP Enrollment	24,095	24,519	24,978	25,229	23,833	23,170	21,137	19,803	21,418	21,925	21,509

12

⁵⁸ 2006 Universal Service Report at 7, 44; 2007 Universal Service Report at 7, 44; 2008 Universal Service Report at 7, 43; 2009 Universal Service Report at 8, 45; 2010 Universal Service Report at 9, 46; 2011 Universal Service Report at 9, 45; 2012 Universal Service Report at 7, 39; 2013 Universal Service Report at 6, 41; 2014 Universal Service Report at 6, 47; 2015 Universal Service Report at 6, 47; 2016 Universal Service Report at 59.



1



2

3 Again, as these charts illustrate, Columbia’s residential customer class has continued to grow, yet
 4 its CAP enrollment has remained largely stagnant and in some years has declined. This is not
 5 because of a lack of need.

6 As I noted in Section I above, 12,294 confirmed low income customers had existing debt
 7 to Columbia in 2016.⁵⁹ These customers were *known* to Columbia to be low income and, by
 8 Columbia’s own definition, were payment troubled. In other words, these 12,000+ customers were
 9 categorically eligible for reduced rates and arrearage forgiveness through enrollment in CAP, but
 10 were not enrolled in the program.

11 Columbia’s CAP retention rate is also troubling, and contributes to Columbia’s declining
 12 CAP enrollment rate. In 2017, roughly 10% of Columbia’s CAP customers (2,206) were removed

⁵⁹ 2016 Universal Service Report at 20.

1 from the program because they did not recertify their income.⁶⁰ Recertification issues have been
 2 a consistent and growing issue for Columbia’s CAP:

3 **CAP Removal for Recertification Issues⁶¹**

2013	2014	2015	2016	2017
1,067	1,359	2,254	2,435	2,206

4 Columbia’s enrollment and retention policies and procedures must be revised to ensure that
 5 all those who are eligible for CAP are able to access and maintain enrollment.

6 **Q: Do you have recommendations for how Columbia could improve its CAP enrollment
 7 to remediate the impact of the rate increase on low income households?**

8 A: Yes. First, Columbia should be required to improve its outreach, education, and referral
 9 processes. Specifically, I recommend that Columbia take the following affirmative steps to bolster
 10 CAP enrollment:

- 11 • *Screen for CAP Eligibility During All Credit-Related Calls*
 12 When a customer contacts Columbia to request a payment arrangement or otherwise
 13 expresses an inability to pay, those customers should be immediately screened for
 14 eligibility in CAP. This is not only good practice. I am advised by counsel that this is also
 15 a legal requirement enshrined in Chapter 14 of the Public Utility Code.⁶²
- 16 • *Actively Recruit Customers with Existing Debt to Enroll in CAP*
 17 Customers with existing debt to Columbia who do not reach out to Columbia should also
 18 be specifically informed about CAP and actively encouraged to enroll in CAP to help
 19 reduce energy costs and address arrearages in a manner that does not further exacerbate the
 20 household’s payment issues.
- 21 • *Implement a Warm-Transfer Referral Process to Columbia’s CAP Administrator*
 22 It is often difficult – especially for low income households – to make calls to their utility
 23 during business hours. Low wage employers often prohibit employees from making calls
 24 during work hours. Also, low income households often lack access to stable
 25 telecommunication services with which to make calls to their utility. Providing a warm-
 26

⁶⁰ Appendix B, CAUSE-PA to CPA 2-018.

⁶¹ 2017 Impact Evaluation Report of Columbia’s Universal Service and Energy Conservation Programs, at 36 (filed Sept. 1, 2017) (hereinafter 2017 USECP Evaluation); see also Appendix B, CAUSE-PA to CPA 2-018.

⁶² 66 Pa. C.S. § 1410.1.

1 transfer to the CAP administrator when a customer indicates they are low income would
 2 help condense the time, energy, and frustration that low income families often experience
 3 when trying to address or resolve debt to their utility provider.

4 • *Enhance Efforts to Recruit LIHEAP Recipients to Enroll in CAP*

5 In the 2017-2018 LIHEAP program year, 16,046 CAP customers did not receive
 6 LIHEAP.⁶³ On the other hand, 9,049 customers received a LIHEAP grant but were not
 7 enrolled in CAP.⁶⁴ More must be done to enroll LIHEAP recipients into CAP and to
 8 encourage CAP participants to apply for LIHEAP.

9 Second, Columbia must make critical improvements to its recertification process to ensure
 10 that CAP customers are not unnecessarily removed from CAP. Currently, Columbia solicits
 11 recertification by sending a letter 30 days prior to the CAP enrollment anniversary date.⁶⁵
 12 Columbia also sends a reminder letter at some point prior to removing the customer from CAP for
 13 failure to recertify, though it is not clear how many days the reminder is mailed in advance of
 14 removal.⁶⁶ Columbia’s CAP administrator, the Dollar Energy Fund, occasionally also makes
 15 follow-up calls, but a recent evaluation of Columbia’s CAP revealed that these follow-up calls
 16 “were made only as time and resources permitted.”⁶⁷ I recommend that Columbia be required to
 17 make the following changes to its recertification process to better ensure that CAP customers are
 18 not prematurely removed from the program while they are still in need of assistance:

19 • *Allow for Electronic Recertification*

20 Columbia only accepts recertification by mail or by fax. While these remain important
 21 methods of communication, many families are more accustomed to communicating
 22 electronically. Allowing for electronic submission of income would help ensure that
 23 administrative functions are not creating a barrier to program participation.
 24

25 • *Require Dollar Energy Fund to Conduct Routine Reminder Calls*

26 Columbia’s 2017 USECP Evaluation recommended that Columbia take this step to improve
 27 its CAP retention. Specifically, the evaluation recommended that Columbia:

⁶³ Appendix B, CAUSE-PA to CPA 1-010.

⁶⁴ Appendix B, CAUSE-PA to CPA 1-011.

⁶⁵ 2017 USECP Evaluation at 42; see also Attachment B, CAUSE-PA to CPA 2-014.

⁶⁶ Id.

⁶⁷ 2017 USECP Evaluation at 42.

1 Provide DEF, the CAP Administrator, with real time information
2 electronically on CAP customers due for recertification. Include reminder
3 phone calls 30 days prior to the due date to DEF's recertification workflow
4 and establish recertification improvement goals.⁶⁸

5 I agree with this recommendation, and believe it should be implemented prior to
6 approving any increase in residential rates.

7
8 • *Send a Postage-Paid Envelope*

9 Sending a postage-paid envelope may seem like a trivial detail. But for many low income
10 households, particularly elderly, disabled and homebound populations, getting a stamp to
11 mail in a recertification form can add significant time and frustration to the recertification
12 process.

13 CAP Affordability

14 **Q: Above, you stated that in addition to CAP enrollment and retention, your second**
15 **primary concern with CAP was that it is not delivering an affordable bill. Please explain.**

16 A: In 2017, approximately 15% (2,995) of Columbia's CAP customers had an energy burden
17 exceeding the Commission's maximum energy burden for gas heating customers (8% for those
18 at 0-50% FPL and 10% for those at 51-100% or 101-150% FPL).⁶⁹ The majority of CAP
19 customers with excessive energy burdens – many approaching or exceeding 20% of their income
20 – are also Columbia's poorest customers, whose gross income is below 50% FPL.⁷⁰ 97% of
21 those who exceeded the Commission's maximum energy burden are below 50% FPL.⁷¹

⁶⁸ 2017 USECP Evaluation at 36.

⁶⁹ Appendix B, CAUSE-PA to CPA 2-012, Attach.A; see also 1-008 (19,999 customers were enrolled in CAP in December 2017).

⁷⁰ Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

⁷¹ Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

1 **CAP Customers with Energy Burden in Excess of Commission Standards⁷²**

Payment Plan	Income Level	2017	2016	2015
% of Income	<50	972	1347	1207
	50-100	0	22	5
	>100	55	130	113
Avg. Payment	<50	82	223	412
	50-100	6	18	28
	>100	1	0	3
% of Bill	<50	240	312	520
	50-100	38	48	93
	>100	2	1	4
Min. Payment	<50	1,599	1,186	1057
	50-100	0	1	1
	>100	0	0	1
Senior CAP	<50	0	0	0
	50-100	0	0	0
	>100	0	0	0
Total		2,995	3,288	3,444

2 In addition to *broad* CAP unaffordability, affecting roughly 15% of the CAP population,
3 the *depth* of unaffordability for those that exceed the Commission’s energy burden standards is
4 also troublesome. In 2017, about 880 CAP participants were charged 15% or more their income
5 for natural gas costs alone.⁷³ The highest energy burden for Columbia’s CAP customers topped
6 out at 330% of income.⁷⁴

7 **Q: What do you believe is the reason for CAP unaffordability?**

8 I believe Columbia’s CAP unaffordability is primarily driven by two factors: (1) failure to
9 adequately adjust the administrator-selected CAP rate plan; and (2) the imposition of a “CAP-

⁷² Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

⁷³ Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

⁷⁴ Appendix B, CAUSE-PA to CPA 2-012, Attach.A.

1 Plus” fee, which is above and beyond the CAP rate plan. Together, these two factors drive
 2 unaffordability within CAP.

3 **Q: Please explain why you believe that Columbia’s CAP rate plan selection policy**
 4 **drives CAP unaffordability.**

5 A: Currently, Columbia’s CAP administrator selects the applicable rate plan. In doing so, the
 6 administrator “select[s] the most affordable option *not to be less than the average amount received*
 7 *over the previous 12 months.*”⁷⁵ After intake, Columbia’s CAP administrator reassesses the
 8 applicable CAP rate plan upon recertification, relocation, or customer request.⁷⁶

9 There are two critical problems with this process. First, it requires the administrator to
 10 select a rate which is no lower than the amount the household paid over the prior 12 months. This
 11 threshold is arbitrary. As I previously discussed, low income households often forego critical life
 12 necessities in order to pay for natural gas service. Many, in fact, take out risky, high-interest
 13 payday loans just to keep up.⁷⁷ Households with a positive payment history should not be required
 14 to continue to keep up with unaffordable bills just because they have managed to do so in the past.
 15 The goal of CAP is and should be to promote bill affordability for low-income households.

16 Second, the selection of a particular CAP design for a household is too infrequently
 17 assessed. Recertification takes place once every year, or once every other year for those who
 18 receive a LIHEAP grant or are enrolled First Energy’s electric CAP.⁷⁸ Thus, unless the CAP

⁷⁵ 2019-2021 USECP at 19.

⁷⁶ Appendix B, CAUSE-PA to CPA 2-013.

⁷⁷ Ariel Drehobl & Lauren Ross, ACEEE, Lifting the High Energy Burden in America’s Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities, at 13 (April 2016), <http://aceee.org/research-report/u1602> (“A 2012 study found that paying utility bills was the most common reason why individuals took out a payday loan. These loans are small, short-term loans with high interest rates that can make repayment difficult and costly.”).

⁷⁸ Appendix B, CAUSE-PA to CPA 2-013, 2-014.

1 participant relocates or knows they may affirmatively request an adjustment, their payment plan
2 may only be assessed once every other year.⁷⁹ But each month, a given CAP rate plan may create
3 very different resulting rates, dependent primarily on weather and natural gas commodity costs.
4 Failure to reassess CAP rates more frequently can, thus, create significant levels of unaffordability.
5 It is therefore critical that Columbia more regularly reassess the appropriate CAP rate for each
6 participant to ensure that CAP is producing a consistent level of affordability which does not
7 exceed Commission standards.

8 In response to an interrogatory, Columbia asserts that “any customer that feels they cannot
9 afford their current CAP payment plan can contact the company and be re-evaluated for a lower
10 option if available.”⁸⁰ But CAP customers are never explicitly informed of this option, and it is not
11 guaranteed to produce a lower bill.⁸¹

12 **Q: Do you have any recommendations for how to remediate the unaffordability caused**
13 **by Columbia’s CAP rate plan selection policy?**

14 Yes. First, Columbia should no longer require the administrator to select a CAP rate that
15 is not less than the average payments over the last 12 months. Instead, the primary criteria should
16 be to select the CAP rate that is most affordable for the household. Second, Columbia should be
17 required to reassess CAP rate plans on a monthly basis, and should select the most affordable rate
18 for the CAP participant. People’s Natural Gas, which offers percentage of income or average bill
19 payment options to its CAP customers, has a comparable system in place to automatically reassess
20 CAP customers’ applicable payment plan each month to ensure that CAP customers are receiving

⁷⁹ While Columbia asserts that a CAP customer may call to request a manual payment plan assessment at any time, it also admits that it does not disclose or otherwise explain this option to CAP participants.

⁸⁰ Appendix B, CAUSE-PA to CPA 1-001.

⁸¹ Appendix B, CAUSE-PA to CPA 4-002 (non-confidential portion).

1 the lowest available CAP rate plan.⁸² Regular reassessment of the CAP rate plan is critical to
2 ensure that CAP customers are not being charged unaffordable rates in excess of Commission
3 standards.

4 **Q: Above, you noted that a second factor driving Columbia's CAP unaffordability is**
5 **CAP Plus. Please explain.**

6 A: CAP Plus is a fee added to every CAP bill based on Columbia's total LIHEAP annual
7 receipts for the previous LIHEAP program year.⁸³ The CAP Plus fee is adjusted every November,
8 and varies depending on the amount of LIHEAP dollars assigned to Columbia by CAP customers
9 in the prior program year. Currently, the fee is \$2.95, which Columbia rounds to \$3.00 per month
10 – or \$36/year.⁸⁴ The CAP Plus amount varies from year to year depending on gross LIHEAP
11 receipts and CAP enrollment. In 2014 and 2015, the CAP Plus charge was double the current
12 charge at \$6.00/month.⁸⁵

13 Adding any amount to a CAP bill further undermines the ability of the program to reach
14 appropriate levels of affordability, particularly for those at the lowest level of poverty. As I will
15 explain in further detail in a moment, Columbia's CAP rate plans often already produce an energy
16 burden which significantly exceeds Commission standards. A breakdown of the average energy
17 burden of CAP customers – with and without CAP Plus charges – demonstrates that CAP Plus has
18 an appreciable impact on CAP customer bills:

⁸² See Peoples Natural Gas Company LLC, Universal Service and Energy Conservation Plan for 2015-2018, Final Order, Docket No. M-2014-2432515, at 25 (Dec. 17, 2015).

⁸³ Appendix B, CAUSE-PA to CPA 1-004.

⁸⁴ Id.

⁸⁵ 2019 to 2021 USECP at 20-21.

1 **CAP Plus Impact on Energy Burden⁸⁶**

Payment Plan	Income Level	Increase in Energy Burden because of CAP-Plus		
		2017	2016	2015
% of Income	0-50	0.56%	1.18%	1.13%
	51-100	0.4%	0.85%	0.51%
	>100	0.42%	1.65%	0.86%
Avg. Payment	0-50	0.36%	1.01%	1.16%
	51-100	0.3%	0.59%	0.59%
	>100	0.18%	0.35%	0.36%
% of Bill	0-50	0.28%	1.06%	1.22%
	51-100	0.28%	0.57%	0.56%
	>100	0.17%	0.35%	0.36%
Min. Payment	0-50	1.34%	2.52%	3.34%
	51-100	0.29%	0.6%	0.53%
	>100	0.16%	0.3%	0.35%
Senior CAP	0-50	n/a	n/a	n/a
	51-100	0.39%	0.76%	0.78%
	>100	0.23%	6.06%	0.46%

2 As the table shows, the CAP Plus fee can materially increase a CAP participants' energy burden,
3 particularly for the poorest households with income that is below 50% FPL and those enrolled in
4 the minimum payment plan. These are the same CAP participants that, as explained above, are
5 most likely to already exceed Commission-established energy burden levels.

6 **Q: Do you have any recommendations for how to remediate the impact that CAP Plus**
7 **has on CAP affordability?**

8 A: Yes. Given the disproportionate impact of CAP Plus on those at the lowest level of poverty
9 and those enrolled in the minimum payment plan, I recommend waiving the CAP Plus fee for all
10 households with income between 0-50% FPL and any household who pays the minimum CAP bill.
11 CAP-Plus affects these households the most because – as a flat fee – it is regressive in nature. That

⁸⁶ Appendix B, CAUSE-PA to CPA 2-009 & 2-010.

1 is, CAP Plus consumes more of their limited income than households with higher income. This is
2 why it significantly skews their energy burdens. To be clear, my recommendation is not to change
3 the CAP Plus calculation to spread the cost across fewer CAP customers. That would increase the
4 fee for other CAP customers, driving up their relative levels of unaffordability. Rather, CAP Plus
5 calculation should remain the same, but the fee should not be collected for those at 0-50% FPL
6 and for those enrolled in the minimum payment plan.

7 **Low Income Usage Reduction Program**

8 **Q: Is Columbia’s Low Income Usage Reduction Program adequately designed and**
9 **implemented to remediate the impact of the proposed rate increase on low income**
10 **households?**

11 A: No. The Low Income Usage Reduction Program (LIURP) is specifically designed to
12 reduce energy usage for low income households, and produces average savings of between 21-
13 24% for participating households.⁸⁷ But Columbia’s LIURP budget is already inadequate to meet
14 existing need, and cannot be relied upon in any measure to offset the expanded need which will
15 result from the proposed rate increase.

16 Columbia’s demonstrated need for LIURP is significantly greater than the 440 served in
17 2017. In Columbia’s pending Universal Service and Energy Conservation Plan for 2019-2021, it
18 estimates that 18,647 households are eligible for weatherization. I disagree with Columbia’s
19 estimate, and believe the need is actually much higher.⁸⁸ However, regardless of my objections to

⁸⁷ See 2017 USECP Evaluation at 56

⁸⁸ 2019-2021 USECP at 30. Columbia’s LIURP needs assessment is based on eligibility information contained in its own system. It also presumes only a 50% participation rate for tenants, which I believe is artificially low. As I address in further detail below, Columbia’s LIURP eligibility guidelines are narrow, and exclude large segments of the low income population (particularly renters and individuals who reside in multifamily dwellings) that are likely in need of usage reduction services and should be eligible to participate in the program.

1 the needs assessment, my ultimate conclusion is the same: Columbia is serving only a small
2 fraction of the demonstrated need for comprehensive energy efficiency and conservation services.
3 This inadequacy will only grow more pronounced if Columbia's proposed rate increase is
4 approved.

5 In addition to being significantly underfunded to serve the demonstrated need, Columbia's
6 LIURP is designed and implemented in a manner which excludes a number of critical customer
7 subsets within the low income population, including renters and those who live in multifamily
8 housing. In 2017, Columbia served 440 households through LIURP, including 69 tenants and 371
9 homeowners.⁸⁹ In other words, only 15.7% of the total LIURP budget was spent to remediate
10 homes for low income renters. But low income households are more likely to rent than they are
11 to own. Moreover, over the last three program years, Columbia has not provided LIURP services
12 to any multi-family buildings. But again, a higher proportion of low income households reside in
13 multifamily housing.

14 **Q: Do you have any recommendations for how Columbia could improve the adequacy of**
15 **its LIURP program to serve estimated need?**

16 A: Yes. I recommend that Columbia increase its LIURP budget sufficient to remediate all of
17 Columbia's eligible tenant and renter households within a 24-year period. I am recommending a
18 24-year period because it is two-times the 12-year maximum payback period of Columbia's
19 LIURP measures. While I strongly believe that Columbia should strive to serve all eligible
20 consumers within its 12-year payback period, I recommend a 24-year completion goal in an
21 attempt to balance the overwhelming need with the principles of gradualism and a recognition of

⁸⁹ Appendix B, CAUSE-PA to CPA 2-001, 2-002.

1 the fact that it will take significantly more administrative resources for Columbia to ramp up its
2 LIURP programming to that degree. Columbia estimates that it would require approximately \$132
3 million to serve its estimated eligible population of 18,647.⁹⁰ Thus, to reach a 24-year completion
4 goal, Columbia’s annual LIURP budget would need to be \$5,500,000 (based on current costs).
5 Therefore, I recommend that Columbia be required to increase its LIURP budget from \$4,750,000
6 to \$5,500,000 – an annual increase of \$750,000.

7 In addition, to account for the increased need for weatherization services as a result of any
8 approved increase in rates, I recommend that Columbia further increase its LIURP budget by a
9 percentage equal to the percentage rate increase to the residential customer class. For example, if
10 a 5% rate increase is approved for Columbia’s residential consumers, Columbia should increase
11 its annual LIURP budget by a corresponding 5%. Indeed, the initial increase of \$750,000 would
12 only remediate the current inadequacy of LIURP – it would not address increased need. As such,
13 an additional 5% incremental LIURP increase, based on any approved rate increase to the
14 residential class, is also necessary.

15 **Q: You noted above that Columbia’s LIURP design works to exclude renters. Please**
16 **explain.**

17 A: Columbia’s landlord outreach to solicit participation in LIURP is insufficient to overcome
18 common obstacles to participation. Columbia sends a single letter and brochure to the landlord to
19 explain the program and obtain the landlord’s consent for the tenant to participate.⁹¹ This letter
20 contains a “Release of All Claims and Authorization to Use Data” form.⁹² Both the letter and the

⁹⁰ 2019-2021 USECP at 30.

⁹¹ Appendix B, CAUSE-PA to CPA 2-005, 2-006.

⁹² Appendix B, CAUSE-PA to CPA 2-005 Attach.B

1 form contain a good deal of legal terms and conditions. The letter includes an entire paragraph
2 placing the onus of all repairs on the landlord “if problems are detected regarding the gas
3 equipment such as furnace, water heater, dryer, range, houseline, and service line; and with the
4 house, such as structural problems, roof leaks, wiring or infestations.”⁹³ In turn, the release form
5 includes an express waiver of “any warranties or merchantability”.⁹⁴ If Columbia does not receive
6 a response, it sends a letter to the tenant explaining that it cannot weatherize the tenant’s home.⁹⁵

7 In reviewing this process, Columbia’s independent program evaluator concluded that the
8 “language in Columbia’s legal contract for LIURP is very restrictive and may be a barrier to
9 landlord participation with the program.”⁹⁶ I agree.

10 **Q: Do you have any recommendations for how Columbia could remediate its landlord**
11 **solicitation process?**

12 A: Yes. I recommend that Columbia obtain the landlord’s telephone number as part of the
13 LIURP application process for renters, and affirmatively reach out to the landlord both before and
14 shortly after the letter is mailed. This additional outreach will both alert the landlord that the forms
15 are coming and provide an active point of contact for the landlord to ask questions and learn about
16 the advantages and disadvantages of the program. I further recommend that Columbia hold a
17 stakeholder meeting to redesign its landlord solicitation letter and the tenant letter.

18 **Q: You also noted above that Columbia’s LIURP design works to exclude multifamily**
19 **residents. Please explain.**

⁹³ Appendix B, CAUSE-PA to CPA 2-005 Attach.B

⁹⁴ Appendix B, CAUSE-PA to CPA 2-005 Attach.B

⁹⁵ Appendix B, CAUSE-PA to CPA 2-005, 2-006.

⁹⁶ 2017 USECP Evaluation at 59.

1 A: As I have previously explained, households living in multifamily units are likely to have
2 lower overall usage but higher usage per square foot compared to single family homes.⁹⁷ But
3 Columbia’s usage threshold does not account for those who live in smaller, multifamily homes –
4 despite the fact that many of these households pay for the programs through rates and could
5 significantly benefit from targeted usage reduction programming. Coupled with the
6 disproportionate impact of Columbia’s high-fixed-charge rate design, addressed above in section
7 II, low income households residing in multi-family dwellings will be disproportionately impacted
8 by the proposed rate increase – while at the same time are without the ability to remediate the
9 financial impact through the adoption of energy efficiency and conservation measures.

10 **Q: Do you have any recommendations for how Columbia could adjust its LIURP design**
11 **to include households living in multifamily units?**

12 A: Yes. I recommend that Columbia be required to propose a three-year pilot multifamily
13 LIURP program with an initial annual budget of \$70,000 in its 2019-2021 Universal Service and
14 Energy Conservation Plan, which should be sufficient to serve at least 10 households in light of
15 Columbia’s approximate \$7,000 average job cost.⁹⁸ These funds should be in addition to
16 Columbia’s regular LIURP budget, and targeted to individually-metered multifamily residential
17 units with higher-than-average usage per square foot of living space. To help ensure that the pilot
18 program is able to gain traction in the multifamily housing communities, I recommend that
19 Columbia partner with the Housing Alliance of Pennsylvania and the Pennsylvania Housing
20 Finance Agency to help gain insight and inroads into this difficult-to-serve building type. Ongoing

⁹⁷ Gary Pivo, Energy Efficiency and its Relationship to Household Income in Multifamily Rental Housing (Sep. 2012), https://www.fanniemae.com/content/fact_sheet/energy-efficiency-rental-housing.pdf.

⁹⁸ 2017 USECP Evaluation at 60.

1 results of the pilot should be shared with members of the Universal Service Advisory Committee,
2 many of whom are members of the local communities in Columbia’s service territory and can
3 assist Columbia to overcome common barriers to implementation of a multifamily energy
4 efficiency program. Whether or not to continue the program beyond the three year period, and the
5 appropriate corresponding budget amount, would be based on the outcome of the pilot program.

6 **Hardship Fund Program**

7 **Q: Please summarize Columbia’s Hardship Fund proposal.**

8 A: Columbia is proposing to continue its use of penalty credits and refund proceeds from the
9 interstate pipelines serving its system.⁹⁹ Columbia estimates that the current balance of credits and
10 refunds will enable the Hardship Fund to operate at current levels through 2021. Thereafter,
11 Columbia proposes to “continue to use pipeline refunds/supplier credits annually, as available, in
12 addition to its on-going efforts to raise voluntary contributions.”¹⁰⁰

13 **Q: Do you agree with this approach?**

14 A: Yes. As Columbia witness Deborah Davis explained in direct testimony, Columbia’s
15 Hardship Fund program is a “fund of last resort” – and provides critical assistance to those who
16 are facing unique hardships and/or who cannot otherwise access other forms of assistance. Ms.
17 Davis explained that, without the use of pipeline refunds and supplier credits to supplement the
18 Hardship Fund, it would have run out of funds in previous program years “as early as mid-March”
19 – leaving vulnerable households without any assistance until the program re-opened in October.¹⁰¹
20 In light of the proposed rate increase, the demand for Hardship Fund assistance is likely to grow

⁹⁹ CPA St. 14, Davis, at 12:7-9.

¹⁰⁰ CPA St. 14, Davis, at 12:7-9.

¹⁰¹ CPA St. 14, Davis, at 13:14-20, 14:1-3.

1 even greater in the coming years, which means that the Hardship Fund will be depleted at an even
2 faster rate than in previous years, leaving many vulnerable households without any assistance for
3 most of the year.

4 As Ms. Davis explains, if the refunds and credits were refunded to residential customers,
5 Columbia estimates that residential customers would receive approximately \$0.16 per month.¹⁰²
6 But if Columbia is allowed to continue using these funds to supplement the Hardship Fund, it can
7 serve approximately 933 customers who are otherwise unable to obtain energy assistance and who
8 face the imminent loss of natural gas service.¹⁰³ In balance, the overwhelming need for Hardship
9 Fund assistance vastly outweighs the \$0.16 that would otherwise be refunded to residential
10 ratepayers. As such, I strongly support Columbia's proposal to continue supplementing its
11 Hardship Funds with voluntary ratepayer contributions.

12 **V. OTHER ISSUES EFFECTING QUALITY OF SERVICE**

13 **Q: Do you have any other concerns about Columbia's quality of service which you would**
14 **like to address?**

15 A: Yes. Columbia has a number of subtle issues with its medical certificate, foreign language,
16 security deposit, and domestic violence policies which do not align with Commission regulatory
17 requirements and/or best practices to ensure adequate protections for uniquely vulnerable
18 populations, including victims of domestic violence and those with a serious medical illness.

19 **Q: What are your concerns with Columbia's medical certificate policy?**

20 A: I have two concerns with Columbia's medical certificate policy.

¹⁰² CPA St. 14, Davis, at 21:13-15.

¹⁰³ CPA St. 14, Davis, at 21:18-20.

1 First, Columbia’s medical certificate policy does not allow for households to submit a
2 fourth medical certificate, for protection from termination beyond 90 days, unless the household
3 has paid all of their outstanding debt while protected by the certificate.¹⁰⁴ But I am advised by
4 counsel that the Commission’s Chapter 56 regulations require public utilities accept additional
5 medical certificates – beyond the first three – if the household has made payments on the current
6 charges or budget bill, regardless of whether the household has additional outstanding debt.¹⁰⁵ As
7 the Commission explained in its Final Chapter 14 Implementation Order:

8 [W]e reiterate what we said in the 2011 rulemaking and in the current 52 Pa. Code
9 § 56.116: that customers ‘shall retain a duty to make payment on all current
10 undisputed bills or budget billing amount...’ while under the protection of a
11 medical certificate. We further reiterate that this means the current bill (or budget
12 bill) must be paid in full by the due date. Failure to do so by the customer means
13 that the utility can count the medical certificate toward the limits found in 52 Pa.
14 Code § 56.114.¹⁰⁶

15 As such, Columbia’s medical certificate renewal policy – requiring payment on all outstanding
16 arrears before accepting a fourth medical certificate – is not compliant with Chapter 56.

17 Columbia also requires the use of its form, with the limited exception of a medical
18 certificate submitted on a certifying professional’s letterhead.¹⁰⁷ Again, I am advised by counsel
19 that this is not in accord with Chapter 56.¹⁰⁸ The Commission clarified in its Chapter 14
20 Implementation Order that any “written letter or note” may be submitted, including electronic
21 submissions, “as long as it includes the required content.”¹⁰⁹

¹⁰⁴ Appendix B, CAUSE-PA to CPA 3-010

¹⁰⁵ Chapter 14 Implementation, Final Order, Docket No. M-2014-2448824, at 15 (order entered July 9, 2015).

¹⁰⁶ Chapter 14 Implementation, Final Order, Docket No. M-2014-2448824, at 15 (order entered July 9, 2015).

¹⁰⁷ Appendix B, CAUSE-PA to CPA 3-009

¹⁰⁸ Chapter 14 Implementation, Final Order, Docket No. M-2014-2448824, at 15 (order entered July 9, 2015).

¹⁰⁹ Chapter 14 Implementation, Final Order, Docket No. M-2014-2448824, at 15 (order entered July 9, 2015).

1 **Q: Do you have any recommendations regarding Columbia’s medical certificate policy?**

2 A. Yes. I recommend that Columbia revise its policies and procedures to allow for additional
3 medical certificate renewals if the household pays their current charges or budget bill. In turn, I
4 recommend that Columbia be required to inform customers when they submit their first medical
5 certificate that they may continue to renew the medical certificate (beyond the first three
6 certificates / 90 days of protection) if they keep up with the current charges or budget bill while
7 the medical certificate is in place. Finally, Columbia should accept any written document which
8 contains the required information. Adopting these policy changes would help protect medically
9 vulnerable household from the loss of service.

10 **Q: What are your concerns with Columbia’s security deposit policy?**

11 A: Columbia does not actively inform customers – at the time a security deposit is assessed –
12 that it is prohibited from charging a security deposit if the customer is CAP-eligible. Rather,
13 Columbia only waives the security deposit if the customer “expresses concern over payment of a
14 security deposit during a call to connect service.”¹¹⁰

15 **Q: Do you have any recommendations regarding Columbia’s security deposit policy?**

16 A: Yes. Columbia should advise consumers of the prohibition on security deposits for CAP-
17 eligible customers at the time the security deposit is assessed. Many low income customers are
18 unable to effectively “express” that they cannot afford to pay an assessed fee – and may not
19 disclose to Columbia that they are unable to pay. Thus, actively disclosing that Columbia will
20 waive a security deposit if the customer is CAP-eligible will ensure that all CAP-eligible
21 households are protected from the often insurmountable up-front cost of a security deposit.

¹¹⁰ Appendix B, CAUSE-PA to CPA 3-001 (non-confidential portion).

1 **Q: What are your concerns with Columbia’s domestic violence policy?**

2 A: Columbia has a commendable written policy to promptly and effectively address the
3 unique needs of domestic violence survivors. However, I have two concerns pertaining to this
4 policy with respect to (1) the payment arrangement standards imposed on victims of domestic
5 violence and (2) the lack of explicit confidentiality provisions to protect uniquely sensitive
6 personal information from inadvertent disclosure.

7 First, I am advised by counsel that Columbia’s payment arrangement standards for victims
8 of domestic violence with a PFA or other court order evidencing domestic violence are not in
9 compliance with Chapter 14.¹¹¹ Chapter 14 explicitly exempts victims of domestic violence with
10 a PFA or other applicable court order from the standards contained therein.¹¹² The applicable
11 billing, collections, and termination standards for customers or applicants with a PFA or other
12 court order evidencing domestic violence are instead found in Title 52, Chapter 56, Subsections L
13 through V of the Commission’s regulations.¹¹³ With respect to payment arrangements, the
14 applicable regulatory standards require utilities to take into account the victim’s unique
15 circumstances and ability to pay.¹¹⁴ Unlike the Chapter 14 payment arrangement standards, the
16 applicable regulatory standards do not place a limit on the number or length of payment
17 arrangements available to the victim on a balance accrued in the victim’s name.¹¹⁵

¹¹¹ CAUSE-PA to CPA 3-011 – CONFIDENTIAL (not included in appendix).

¹¹² 66 Pa. C.S. § 1417; see also 52 Pa. Code § 56.285 (“An outstanding residential account with the utility may be amortized over a reasonable period of time. Factors to be taken into account include the size of the unpaid balance, the ability of the applicant to pay, the payment history of the applicant and the length of time over which the bill accumulated.”)

¹¹³ 66 Pa. C.S. § 1417; see also 52 Pa. Code §§ 56.251 to 56.461.

¹¹⁴ 66 Pa. C.S. § 1417; see also 52 Pa. Code § 56.285.

¹¹⁵ 66 Pa. C.S. § 1417; see also 52 Pa. Code § 56.285.

1 I also note that Columbia’s policy does not explicitly address confidentiality of PFAs and
2 other court orders which are submitted to the Company. PFAs and other court orders which pertain
3 to domestic violence are uniquely sensitive, and often contain deeply personal details about the
4 abuse they suffered. Inadvertent disclosure could cause significant harm or hardship to the victim
5 if disclosed to the wrong person.

6 **Q: Do you have any recommendations regarding Columbia’s Protection From Abuse
7 Order policy?**

8 A: Yes. I recommend that Columbia revise its PFA policy to allow for more flexible payment
9 arrangements, based on the victim’s unique circumstances and ability to pay. In turn, I recommend
10 that Columbia be required to further revise its PFA policy to explicitly address confidentiality.

11 **VI. SUMMARY OF RECOMMENDATIONS**

12 **Q: Please summarize your conclusions and recommendations.**

13 I have made a number of recommendations throughout my testimony, each with the express
14 goal of mitigating the financial impact of a rate increase for basic services on low income
15 households. As I have concluded throughout, the financial impact of a rate increase on low income
16 households and communities is in no way trivial, and must be fully remediated prior to approval
17 of Columbia’s rate proposals.

18 Rate Design / Rider RNA:

19 To ensure that any approved increase in rates does not disproportionately harm low income
20 households’ ability to control usage through the adoption of energy efficiency measures, I
21 recommend the following:

- 22 • Reject Columbia’s proposal to increase the fixed customer charge, and require that any
23 approved rate increase be collected through the volumetric charge.
- 24 • Reject Columbia’s proposal to collect revenue on a per-customer basis through Rider RNA.

1 Universal Service Programs:

2 To ensure that low income households are able to access universal service programs to mitigate
 3 the financial impact of a rate increase, I recommend the following:

- 4 • Require Columbia to take concrete steps to improve CAP enrollment and retention, including:
 - 5 ○ Screen for CAP eligibility during all credit-related calls.
 - 6 ○ Actively recruit customers with existing debt to enroll in CAP.
 - 7 ○ Implement a warm-transfer referral process to Columbia’s CAP administrator.
 - 8 ○ Enhance efforts to recruit LIHEAP recipients to enroll in CAP.
 - 9 ○ Allow for electronic enrollment and recertification.
 - 10 ○ Require the Dollar Energy Fund to call CAP customers 30 days prior to their
 11 recertification deadline, and provide the tools necessary for this task to be completed.
 - 12 ○ Send a postage-paid envelope to facilitate CAP enrollment and recertification.
- 13 • Require Columbia to improve its CAP affordability by taking the following actions:
 - 14 ○ Revise the CAP rate selection criteria to require selection of the most affordable plan.
 - 15 ○ Reassess CAP rate plans on a monthly basis, and select the most affordable rate.
 - 16 ○ Waive the CAP Plus fee for households with income that is at or below 50% FPL or is
 17 enrolled in the minimum payment plan.
- 18 • Improve the reach and accessibility of LIURP by requiring the following improvements:
 - 19 ○ Increase LIURP funding by \$750,000 annually, the amount needed to serve the energy
 20 efficiency needs of the estimated eligible population within a 24-year timeframe.
 - 21 ○ Increase LIURP funding by an additional annual percentage equal to the percentage
 22 increase in approved distribution rates.
 - 23 ○ Improve the landlord consent process to affirmatively reach out to the landlord both
 24 before and shortly after the letter is mailed.
 - 25 ○ Hold a stakeholder meeting to redesign Columbia’s landlord solicitation process.
 - 26 ○ Adjust the LIURP usage threshold to account for usage on a per-square-foot basis.
 - 27 ○ Adopt a three-year LIURP multifamily pilot program with an initial annual budget of
 28 \$70,000 to provide usage reduction services to individually-metered multifamily units.

- 1 ○ Coordinate with the Housing Alliance of Pennsylvania and the Pennsylvania Housing
2 Finance Agency in the design and implementation of a multifamily pilot program, and
3 share ongoing results with the Universal Service Advisory Committee.
- 4 ● Approve Columbia’s proposal to use pipeline credits and refunds to partially fund the Hardship
5 Fund program.
- 6 ● Revise medical certificate renewal policy, and inform customers upon the submission of their
7 first certificate of the ability to continue to renew a medical certificate if they continue to pay
8 current charges or budget bill.
- 9 ● Require Columbia to advise consumers of the security deposit prohibition for CAP-eligible
10 customers at the time the security deposit is assessed.
- 11 ● Require Columbia to revise its Protection From Abuse Policy to more fully comply with
12 Chapter 14, and to protect the confidentiality of domestic violence victims.
- 13 **Q: Does this conclude your Direct Testimony?**
- 14 **A: Yes.**

APPENDIX A

Resume of Mitchell Miller

MITCHELL MILLER
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Mitcmiller77@hotmail.com

EMPLOYMENT

2009-Present Mitch Miller Consulting LLC:

Practice provides consulting services that promote the public interest with a focus on low income households. Specifically over 35 years of expertise is applied to the evaluation of regulatory policy involving customer service, complaint handling, credit and collections and universal service. Objective is to promote public policy development, program design, and implementation of programs for consumer education, energy efficiency, credit and collections, and customer assistance.

2009-2012 Pennsylvania Department of Community and Economic Development Consultant

Served as a Consultant on weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program (WAP) at PA DCED. Was instrumental in transforming the WAP program by creating a performance-based system, dedicated to a high standard of quality, compliance and production. Innovations include introducing performance standards for production, quality and compliance and independent certification and training for all state WAP workers. Also responsible for coordinating the states WAP program with the PUC, utilities and other efficiency programs.

1992-2009 Pennsylvania Public Utility Commission, Bureau of Consumer Services Harrisburg, PA Director

Until his retirement from state service Mr. Miller was director of Consumer Services and PA PUC. His bureau has regulatory authority and responsibility for policy development for all areas of consumer services including resolving consumer complaints and problems, enforcing consumer regulations, developing, implementing and evaluating programs involving complaint handling, complaint analysis collections, enforcement of consumer regulations, utility customer assistance programs and low income conservation. He also directed BCS responsibilities for implementing the Pennsylvania Electric, Gas and Telephone Customer Choice Programs. Specific areas under his Direction include:

Program evaluation and regulation

- Monitoring and evaluating the customer service practices and programs of utilities
- Promulgating regulations, implementing procedures to meet regulatory requirement and taking enforcement action to assure compliance

- Field reviews and audits of utilities' operations and advice the Commission regarding issues of interest and concern of utility consumers
- Compliance enforcement including informal investigations and prosecution of formal cases
- Track trends in the number and type of consumer complaints and inquiries, utility performance at handling customer complaints and payment arrangement requests. Other databases utilized to track utility termination activity, collection of delinquent accounts, compliance with customer service regulations and other areas critical to evaluating utility customer service performance.
- Produce utility performance and evaluative reports for the PUC, utilities and the public

Universal service programs

- The LIURP is targeted toward low-income households with the highest energy consumption, payment problems, and high arrearages. Since the program's inception to 2009, the major electric and gas companies required to participate in LIURP have spent over \$530 million to provide weatherization treatments to more than 350,000 low-income households in Pennsylvania. The budgets for 2008 were 22 million for electric utilities and 9 million for gas utilities
- Customer Assistance Programs (CAPs) provide an alternative to traditional collection methods for low income, payment troubled utility customers. Customers make regular monthly payments, which may be for an amount that is less than the current bill for utility service. Budgets for CAP programs in 2008 were 189 million for electric companies and 174 million for gas companies. Utility companies have spent over 2 billion dollars for CAP through 1998.

Utility Complaint Handling and Regulation

- Responsible for establishing procedures and directing 90 staff in investigating annually over 100,000 informal consumer complaints for regulated fixed utilities, payment arrangement requests and responding to over 70,000 inquiries.
- Arbitrate billing, credit and other informal complaints and issue binding decisions to resolve informal disputes expeditiously. Investigators also issue decisions regarding the amortization of overdue electric, gas, steam heat, water, wastewater and basic telephone bills.

1978-1992 Pennsylvania Public Utility Commission, Division of Research and Planning Harrisburg, PA Chief

Reported to Director of Bureau of Consumer Services with direct responsibility for the direction, supervision and planning of a Division of 15 professionals who are delegated program responsibilities for regulation enforcement, utility program evaluation, customer assistance programs and consumer education. As the first Division Chief he was instrumental in creating these activities

- Bureau's compliance program in enforcing customer service regulations and statues through regulator interpretations, citations and litigation; including preparing with legal staff formal records, briefs, motions, interrogatories, reviewing utility responses and negotiating equitable settlements.

- Development and implementation of computer information evaluation systems for evaluation of utility customer service programs; systematic performance problems are identified through statistical analysis and observation and correction actions recommended via public reports, formal rate cases and consumer services audit programs.
- Managed the development of Commission's first consumer education program including proposing annual plans, statewide networking, supervising staff in conducting of workshops and conferences, and preparation of consumer education materials.
- Supervised the development of an integrated program for low income consumers; through program evaluation, leading to testimony, preparation of policy recommendations, interdepartmental coordination, regulation promulgation and establishing evaluation criteria

1977-1978 Pennsylvania Public Utility Commission

Harrisburg, PA

Research Analyst

Responsible for evaluating existing utility and Commission customer service programs and identifying problems and recommendations for change, which led to Division's current programs.

1974-1977 Governor's Action Center

Harrisburg, PA

Research Supervisor

Office supervisor for a research and information unit. Duties included the modification and maintenance of an information and evaluation system, writing technical and topical reports, quality control review and staff training. Responsible for the supervision of five case evaluator and student interns.

EDUCATION

M.S., Shippensburg University, 1984

Major: Public Administration

G.P.A. 3.9/4.0

B.S., Pennsylvania State University, 1974

Major: Community Development

Cum Laude

Additional Affiliations

Member, Pennsylvania Weatherization Assistance Program Advisory Council

Member, Keystone Energy Efficiency Alliance

Past Co-Chair, Keystone Energy Efficiency Alliance Conference

Past Co-Chair, National Energy and Utility Affordability Conference

APPENDIX B

Interrogatory Responses

CAUSE-PA to CPA 1-001

CAUSE-PA to CPA 1-004

CAUSE-PA to CPA 1-007

CAUSE-PA to CPA 1-008

CAUSE-PA to CPA 1-009

CAUSE-PA to CPA 1-010

CAUSE-PA to CPA 1-011

CAUSE-PA to CPA 1-012

CAUSE-PA to CPA 1-014

CAUSE-PA to CPA 1-015

CAUSE-PA to CPA 1-017

CAUSE-PA to CPA 1-019

CAUSE-PA to CPA 2-001

CAUSE-PA to CPA 2-002

CAUSE-PA to CPA 2-005

CAUSE-PA to CPA 2-006

CAUSE-PA to CPA 2-009

CAUSE-PA to CPA 2-010

CAUSE-PA to CPA 2-012

CAUSE-PA to CPA 2-013

CAUSE-PA to CPA 2-014

CAUSE-PA to CPA 2-018

CAUSE-PA to CPA 3-001 (non-confidential portion)

CAUSE-PA to CPA 3-009

CAUSE-PA to CPA 3-010

CAUSE-PA to CPA 4-002 (non-confidential portion)

Question No. CAUSE-PA 1-001
Respondent: D. Davis
Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-001:

Please identify the financial impact of the proposed increase on CPA CAP customers by payment plan type. If you are unable to identify the financial impact, or assert that there will be no impact, please explain.

Response:

The majority of CAP customers will experience no impact resulting from the proposed increase, as their monthly CAP payment is based on factors unrelated to rates or monthly bills. However, those customers whose monthly CAP payment is the “50% of budget payment option” may experience an increase after the next budget payment re-evaluation, which will occur in May, 2019. At that time, any increase or decrease in bill factors including usage, base rates, gas cost rates/supplier charges or customer charge which result in a total bill increase or decrease will impact their budget payment.

As always, any customer that feels they cannot afford their current CAP payment plan, can contact the company and be re-evaluated for a lower option if available.

Question No. CAUSE-PA 1-004
 Respondent: D. Davis
 Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-004:

Please provide weather normalized median and mean annual usage for the previous 12 months (in Dth) for:

- Customers who participate in CAP, disaggregated by payment plan type (percentage of income, average annual payment, 50% of budget billing, or senior CAP) and income tier;
- Customers who are confirmed low-income but not enrolled in CAP;
- Customers who are not confirmed low-income.

Response:

a.	Percent of Income	Average Annual Payment	50% of Budget Billing	Minimum Payment \$25/Mo.	Senior (CAP)
0-50% Poverty level – Mean	134.4	132.0	98.4	103.2	0.0
0-50% Poverty Level – Median	108.5	109.4	76.0	87.1	0.0
51-100% Poverty Level – Mean	148.8	124.8	100.8	105.6	49.2
51-100% Poverty Level – Median	119.3	105.7	81.2	67.2	48.0
Greater Than 100% Poverty Level – Mean	158.4	127.2	106.8	87.6	51.4
Greater Than 100% Poverty Level – Median	116.2	109.5	90.7	80.1	30.6

b. Mean = 82.6, Median 62.4.

c. Mean = 77.7, Median 62.8.

Question No. CAUSE-PA 1-007
 Respondent: D. Davis
 Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-007:

For the past two twelve month periods ending December 31, 2016 and December 31, 2017, how many of CPA's customers were confirmed low-income, disaggregated by month?

Response:

The following numbers of customers have either documented their income through program participation as low income or self-declared their income as less than or equal to 150% of poverty.

	2017	2016
Jan	68943	68,686
Feb	70274	70,395
Mar	70145	70,521
Apr	69496	69,315
May	68811	68,625
Jun	67901	67,699
Jul	66855	67,043
Aug	66174	66,605
Sep	66022	66,412
Oct	66344	67,036
Nov	66883	67,410
Dec	67659	68,391

Question No. CAUSE-PA 1-008
 Respondent: D. Davis
 Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-008:

For the past two twelve month periods ending December 31, 2016 and December 31, 2017, how many of CPA's confirmed low-income customers were/are enrolled in CAP, disaggregated by month and payment plan type?

Response:

		January	February	March	April	May	June	July	August	September	October	November	December
2016	% of Income	3028	3334	3642	3406	3081	3169	2948	3158	2920	2913	2823	2851
	Average of Payments	6622	7178	7719	7232	7681	7848	7430	7914	7409	7353	7083	7090
	% of Bill	8274	9041	9826	9150	9136	9447	8888	9555	8921	8853	8523	8633
	Minimum Payment	1210	1325	1455	1396	1392	1471	1391	1532	1438	1442	1396	1397
	Senior CAP	8	8	8	8	7	7	6	5	5	5	5	5
2017	% of Income	2990	2808	3487	2843	3562	3432	3228	3467	3163	3303	3161	2913
	Average of Payments	7302	6769	8165	6761	8178	7864	7531	8074	7402	7789	7262	6743
	% of Bill	9021	8497	10499	8600	10711	10283	9734	10514	9481	10107	9429	8764
	Minimum Payment	1467	1390	1731	1410	1825	1806	1728	1911	1758	1841	1729	1574
	Senior CAP	5	5	5	4	5	5	5	5	5	5	5	5

Question No. CAUSE-PA 1-009
Respondent: D. Davis
Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-009:

How many of CPA's confirmed low-income customers received a LIHEAP Cash Grant and/or Crisis Grant in the 2017-2018 LIHEAP program year? Please disaggregate by the type of grants received (Cash Only, Crisis Only, or Both Cash and Crisis).

Response:

As of April 24, 2018:

15,970 customers received Cash only

1,017 customers received CRISIS only

2,576 customers received a CASH and CRISIS grant

Question No. CAUSE-PA 1-010
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-010:

How many of CPA's confirmed low-income customers were enrolled in CAP, but did not receive a LIHEAP Grant in the 2017-2018 LIHEAP program year?

Response:

Of the 26,492 customers that were active in CAP at some point since October 1, 2017, 16,046 customers did not receive a LIHEAP or CRISIS grant this heating season as of April 24, 2018.

Question No. CAUSE-PA 1-011
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-011:

How many of CPA's confirmed low-income customers received a LIHEAP Cash or Crisis Grant in the 2017-2018 LIHEAP program year, but were not enrolled in CAP?

Response:

9,049 customers received a LIHEAP Cash or CRISIS grant and were not enrolled in CAP at any point since October, 2017.

Question No. CAUSE-PA 1-012

Respondent: D. Davis

Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-012:

As of April 1, 2018, how many estimated low-income customers reside within Columbia's service territory? Please explain how CPA arrived at its estimated figures, and include citation and/or copies of any and all workpapers used to perform the estimation.

Response:

Columbia uses census data provided by the staff of the Bureau of Consumer Services ("BCS") to estimate the number of low income customers that reside within Columbia's service territory. Since the Company does not serve 100% of each county, the Company determines the ratio of its customer count to the total population of each county, and then applies that ratio to the total number of low income households in each county, as reported by the BCS, to arrive at the estimated number.

Please see Attachment A to this response for the data reported to the Commission in March, 2018 as part of the Universal Service Reporting Requirements.

County	Customer Count	Census Household	Percent Customers CPA	Census Household Low-Income	Low-Income CPA
Adams	13852	38,459	36.02%	7477	2,693
Allegheny	100189	530,718	18.88%	133566	25,215
Armstrong	879	28,068	3.13%	7264	227
Beaver	34828	69,521	50.10%	18858	9,447
Bedford	73	20,000	0.37%	5886	21
Butler	9102	74,348	12.24%	12867	1,575
Centre	12189	56,116	21.72%	15975	3,470
Clarion	3536	15,830	22.34%	5513	1,231
Clearfield	20	30,929	0.06%	11866	8
Elk	30	13,244	0.23%	2871	7
Fayette	22088	54,391	40.61%	21436	8,705
Franklin	4416	59,486	7.42%	12690	942
Fulton	108	5,960	1.81%	1622	29
Greene	2703	14,394	18.78%	4021	755
Indiana	4	33,066	0.01%	12239	1
Jefferson	916	18,479	4.96%	6103	303
Lawrence	18053	36,138	49.96%	12562	6,275
McKean	3090	17400	17.76%	6036	1,072
Mercer	113	44,385	0.25%	12432	32
Somerset	4620	29,199	15.82%	9231	1,461
Venango	669	22129	3.02%	7246	219
Warren	2371	17113	13.85%	4902	679
Washington	41887	83,949	49.90%	19287	9,623
Westmoreland	20636	149,360	13.82%	35079	4,847
York	97566	165,672	58.89%	38269	22,537
					101,375

Question No. CAUSE-PA 1-014
 Respondent: D. Davis
 Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-014:

How many CAP customers had their service terminated for non-payment in calendar years 2016, 2017, and to date in 2018, disaggregated by month?

Response:

The company only stores one removal date per CAP customer. If a customer was removed in 2016, rejoined CAP and then was removed again in 2017, the data below will only show the 2017 removal date.

	January	February	March	April	May	June	July	August	September	October	November	December
2016	0	0	0	112	123	79	85	68	70	55	41	0
2017	0	0	0	75	127	107	133	155	101	81	34	0
2018	0	0	0	97								

Question No. CAUSE-PA 1-015
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-015:

Of the customers identified in response to CAUSE-PA I-14, please identify the average number of days this subset of customers remained without service.

Response:

This information is not available.

Columbia's customer information system does not have the functionality to link the same terminated account to the same reconnected account and store it over time. Columbia can identify the number of customers terminated and the number of customers reconnected at any given point, but the history of who was terminated and the subsequent reconnection of that household or customer is difficult to track accurately. Spouses, roommates, adult children, or significant others can reconnect in different names. Each time an account is terminated, the sequence number changes on the account even when the same customer reconnects service. This does not always happen in sequential order. Different orders are taken depending on the situation, such as if a meter is removed, if it is a CAP customer, or if the customer has been off for an extended period of time. In addition, if a customer is terminated and reconnected within 5 days, the account never goes to a final status and the occurrence is not recorded in a data field needed for the company to retrieve at a later date.

In order to track this statistic, Columbia would need to make significant revisions to its current customer distributive information system (DIS) to include linking each new connect to a prior disconnected account. At this time, these changes to DIS would be cost prohibitive. Additionally, obtaining information to track these individuals would significantly increase the amount of time and steps it takes a Customer Service Representative to complete the connect application process.

Question No. CAUSE-PA 1-017
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-017:

Of the customers listed in response to CAUSE-PA I-16, please identify the average number of days this subset of customers remained without service.

Response:

This information is not available.

Columbia's customer information system does not have the functionality to link the same terminated account to the same reconnected account and store it over time. Columbia can identify the number of customers terminated and the number of customers reconnected at any given point, but the history of who was terminated and the subsequent reconnection of that household or customer is difficult to track accurately. Spouses, roommates, adult children, or significant others can reconnect in different names. Each time an account is terminated, the sequence number changes on the account even when the same customer reconnects service. This does not always happen in sequential order. Different orders are taken depending on the situation, such as if a meter is removed, if it is a CAP customer, or if the customer has been off for an extended period of time. In addition, if a customer is terminated and reconnected within 5 days, the account never goes to a final status and the occurrence is not recorded in a data field needed for the company to retrieve at a later date.

In order to track this statistic, Columbia would need to make significant revisions to its current customer distributive information system (DIS) to include linking each new connect to a prior disconnected account. At this time, these changes to DIS would be cost prohibitive. Additionally, obtaining information to track these individuals would significantly increase the amount of time and steps it takes a Customer Service Representative to complete the connect application process

Question No. CAUSE-PA 1-019
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 1

Question No. CAUSE-PA 1-019:

Of the customers listed in response to CAUSE-PA I-18¹, please identify the average number of days this subset of customers remained without service.

Response:

This information is not available.

Columbia's customer information system does not have the functionality to link the same terminated account to the same reconnected account and store it over time. Columbia can identify the number of customers terminated and the number of customers reconnected at any given point, but the history of who was terminated and the subsequent reconnection of that household or customer is difficult to track accurately. Spouses, roommates, adult children, or significant others can reconnect in different names. Each time an account is terminated, the sequence number changes on the account even when the same customer reconnects service. This does not always happen in sequential order. Different orders are taken depending on the situation, such as if a meter is removed, if it is a CAP customer, or if the customer has been off for an extended period of time. In addition, if a customer is terminated and reconnected within 5 days, the account never goes to a final status and the occurrence is not recorded in a data field needed for the company to retrieve at a later date.

In order to track this statistic, Columbia would need to make significant revisions to its current customer distributive information system (DIS) to include linking each new connect to a prior disconnected account. At this time, these changes to DIS would be cost prohibitive. Additionally, obtaining information to track these individuals would significantly increase the amount of time and steps it takes a Customer Service Representative to complete the connect application process.

¹ While this Data Request, as served by CAUSE-PA referred to CAUSE-PA I-19, it is assumed that the intended reference was to CAUSE-PA I-18.

Question No. CAUSE-PA 2-001
Respondent: D. Davis
Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-001:

How many LIURP jobs were completed by Columbia Gas for calendar years 2015, 2016, 2017, and to date in 2018, disaggregated by year?

Response:

The following are the number of LIURP completions disaggregated by year for the calendar years 2015, 2016, 2017 and through April, 2018.

LIURP Completions	
2015	615
2016	515
2017	440
2018	78

Question No. CAUSE-PA 2-002
 Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-002:

Of the jobs indicated in response to CAUSE-PA II-1, please provide the number of LIURP jobs completed for each subset of customer:

- a. Homeowners
- b. Tenants
- c. Single family homes
- d. Multifamily homes
- e. Customers receiving LIHEAP (Cash, Crisis and both Crisis and Cash)
- f. CAP customers, disaggregated by CAP option
- g. Confirmed low-income customers not enrolled in CAP.

Response:

The following chart provides the number of LIURP jobs completed by subset:

	2015	2016	2017	2018
Homeowners	452	447	371	66
Tenants	163	68	69	12
Single Family	615	515	440	78
Multi Family	0	0	0	0
Customers Receiving LIHEAP	103	54	154	28
Confirmed Low Income Not in CAP	50	42	42	9
CAP % of Income	37	56	67	15
CAP Avg of Payments	161	151	133	24
CAP % of Bill	183	181	108	17
CAP Minimum Payment	21	17	21	1
CAP Senior CAP	0	0	0	0

Question No. CAUSE-PA 2-005
Respondent: D. Davis
Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-005:

What is the process Columbia uses to reach out to landlords to obtain approval to perform LIURP services for a tenant-applicant? Please provide a copy of any letters, brochures, call scripts, or other documents Columbia uses to encourage landlord approval.

Response:

Columbia sends a letter, a brochure and a landlord agreement form to all property owners with rental units that are eligible for LIURP when the renter has expressed interest in LIURP or is on CAP. If no response is received from the landlord, a letter is sent to the tenant explaining we are unable to weatherize.

Please see CAUSE-PA 2-005 Attachment A for a copy of the LIURP brochure sent to landlords. Please see CAUSE-PA 2-005 Attachment B for a copy of the letter and landlord agreement form. Please see CAUSE-PA 2-005 Attachment C for a copy of the letter sent to a tenant when the landlord does not respond.

Columbia Gas[®]
of Pennsylvania
A NiSource Company

***WarmWise Low Income
Usage Reduction Program
(WW:LIURP)***

Bringing You Comfort, Safety
and Affordability



What is WW:LIURP?

For more than 20 years, Columbia Gas of Pennsylvania's WarmWise Low Income Usage Reduction Program (WW:LIURP) has helped customers more efficiently use natural gas in their homes. Through energy efficiency measures, new technology and a better understanding of home heating, WW:LIURP improves comfort, safety, affordability and energy efficiency at no cost to qualified, Columbia Gas customers.



"Columbia's contractor patiently answered every question we had and gave us a lot of energy saving tips. Thank you Columbia Gas for providing all these services."

-Patricia B.

What can WW:LIURP do for me?

As a qualified Columbia Gas customer, WW:LIURP can provide you with a number of benefits, all at no cost to you.

The program begins with a complete home energy audit performed by a licensed contractor in order to identify potential energy efficiency improvements. Following the audit, several steps may be taken to improve your home's energy efficiency, including:

- Addition of attic and wall insulation
- Installation of a programmable thermostat
- Caulking and weather stripping of doors and windows
- Sealing of air leaks
- Cleaning and safety check of your heating system
- Repair or replacement of faulty heating equipment

What do I need to do to participate in WW:LIURP?

In order to take advantage of the opportunities provided by WW:LIURP, including upwards of \$5000 in home upgrades at no cost to you, qualified customers need to be available during the home energy audit (approximately four hours) as well as make their home available for the weatherization work to be completed. All work is completed by a licensed contractor paid by Columbia Gas. An adult must also be home during the scheduled work, which can be spread over several days to accommodate your schedule.

"Thanks to Columbia Gas, I now have a new furnace and my house is airtight and warm. Plus, when they left for the day, my home was as clean as when they arrived."

-Sandy T.



In addition to these measures, the contractor will provide you with an energy education - additional ways you can save energy and money through efficient home heating.

As a result of participating in the Columbia Gas Warmwise Low Income Usage Reduction Program, during the winter you will find that your heating system will be operating most efficiently.

*For more information, or to enroll in WW:LIURP, call Columbia Gas at **1.800.537.7431***

To learn more about bill payment assistance and home energy efficiency programs available through Columbia Gas, visit www.ColumbiaGasPa.com or call 1-800-537-7431.

Columbia Gas[®]
of Pennsylvania

A NiSource Company



Columbia Gas of Pennsylvania, Inc.
 Southpointe Industrial Park
 121 Champion Way, Suite 100
 Canonsburg, PA 15317
 1-800-537-7431

CAUSE-PA 2-005
 Attachment B
 Page 1 of 2

April 30, 2018

Landlord address

Dear Landlord name,

tenant name the present occupant at:

tenant's address

has applied for weatherization services with Columbia Gas of Pennsylvania's Warm Wise Program.

The Warm Wise Program targets Columbia's low-income families having a history of payment problems and high gas consumption. The program includes at no cost to the tenant or landlord an energy survey to determine necessary weatherization, installation of weatherization measures, and customer energy conservation education all designed to assist customers in reducing their energy usage and utility bills. Attached is an information piece which further explains the Warm Wise Program.

However, repairs will be the responsibility of the landlord if problems are detected regarding the gas equipment such as furnace, water heater, dryer, range, houseline, and service line; and with the house, such as structural problems, roof leaks, wiring or infestations.

As owner of the property, your signature is necessary on the enclosed Landlord Authorization form. This program is vital to help control your tenant's consumption and any measures installed will improve the value of your property. Please sign, date and return a copy of the signed agreement back to us in the enclosed postage-paid envelope within 10 days of the date of this letter. This rental release form shall not be considered a contract, nor does it guarantee that the dwelling unit to be inspected will be eligible for services.

If you have any questions about the Warm Wise Program, or choose not to participate, please call us at 1-800-537-7431.

Sincerely,

Deborah Davis
 Manager, Universal Services

DD/JM
 Enclosures (3)



Columbia Weatherization Program

Landlord Agreement

**RELEASE OF ALL CLAIMS AND
AUTHORIZATION TO USE DATA**

I, the owner of the property at the address listed below, understand that the purpose of the Columbia Weatherization Program is to benefit low income families, and that my tenants have applied to participate in the program. I hereby authorize the property at the address listed below to be weatherized as part of this program.

In consideration of the receipt and installation of weatherization materials, I, the property owner do hereby release, acquit and forever discharge Columbia Gas of Pennsylvania, Inc., and contractor, costs, loss of services, expenses and compensation, which I now have or may hereafter have, or that my heirs, executors or administrators can or may have against Columbia Gas of Pennsylvania, Inc. or contractor (CBO), their officers, agents, employees, successors, and assigns, on account of, or in any way growing out of the weatherization materials provided, as well as the installation and use thereof.

I further agree that the rent at the address below shall not be increased, nor the tenants residing at said address evicted, during the twelve month period immediately following the completion of said weatherization work by Columbia Gas of Pennsylvania, Inc.; provided that the tenants comply with their ongoing obligations and responsibilities as provided by law.

I acknowledge that Columbia Gas of Pennsylvania, Inc., (CBO), and their contractors DISCLAIM ALL WARRANTIES, IMPLIED OR EXPRESS, INCLUDING ANY WARRANTIES OR MERCHANTABILITY WITH RESPECT TO SUCH GOODS, THEIR INSTALLATION, OR THE RESULTS OF THEIR INSTALLATION. I acknowledge that any energy savings projected by Columbia Gas of Pennsylvania, Inc., (CBO), or their contractors as a result of the installation of weatherization materials are only an estimate.

I authorize Columbia Gas of Pennsylvania, Inc. to release to its designees information about my account at the address below and about weatherization materials installed on the property at the address below.

Property owner signature

Date

Address of rental property

City, State and Zip Code



Columbia Gas of Pennsylvania, Inc
Southpointe Industrial Park
121 Champion Way, Suite 100
Canonsburg, PA 15317
1-800-537-7431

Mar-8 2018

James Smith
[REDACTED]

Dear James Smith:

Thank you for your interest in Columbia Gas of Pennsylvania's Warm Wise LIURP Program.

Unfortunately, the owner of your home did not sign and return the required landlord agreement that authorizes us to perform the necessary energy conservation measures your home may require.

If you have any further information on your landlord or possibly a new address, please call or send that information to use at the above address.

In the event you or your landlord has any questions, please call our office at 724-416-6316.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Davis".

Deborah Davis
Manager, Universal Services

DD/JM

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-006:

What was the bill payment frequency (percentage of time that a bill is paid in full and on time) for CAP customers in 2015, 2016 and 2017, disaggregated by year and payment plan type?

Response:

The following is the percentage of CAP customers that billed with owing no arrears on their CAP pay plan.

	2015	2016	2017
% of Income	57.94%	57.52%	58.24%
Avg of Payments	63.23%	65.22%	65.94%
% of Bill	61.10%	61.78%	62.55%
Minimum Payment	57.16%	57.05%	54.97%
Senior CAP	81.01%	83.12%	100.00%

Question No. CAUSE-PA 2-009
 Respondent: D. Davis
 Page 1 of 1

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-009:

For calendar years 2015, 2016, and 2017, what was the average energy burden of CAP customers, including CAP Plus and arrearage forgiveness co-pay charges, disaggregated by year, income level (0-50%, 51-100%, and 101-150% of the federal poverty level), and payment plan type?

Response:

The average energy burden of CAP customers, including CAP Plus and arrearage forgiveness co-pay charges are as follows:

		2015	2016	2017
% of Income	0-50	8.57%	8.66%	8.03%
	51-100	7.78%	8.17%	7.70%
	>100	9.54%	10.43%	9.19%
Avg of Payments	0-50	8.89%	7.48%	6.04%
	51-100	4.99%	4.58%	4.25%
	>100	3.32%	2.98%	2.79%
% of Bill	0-50	10.11%	8.87%	8.02%
	51-100	5.50%	4.93%	4.82%
	>100	3.75%	3.34%	3.26%
Minimum Payment	0-50	21.33%	20.97%	21.81%
	51-100	5.28%	5.03%	4.20%
	>100	3.28%	2.70%	2.15%
Senior CAP	0-50	none	none	none
	51-100	7.16%	6.09%	5.95%
	>100	3.24%	8.40%	3.88%

Question No. CAUSE-PA 2-010
 Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
 in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-010:

For calendar years 2015, 2016, and 2017, what was the average energy burden of CAP customers, excluding CAP Plus but including arrearage forgiveness co-pay charges, disaggregated by year, income level, and payment plan type?

Response:

The average energy burden of CAP customers, excluding CAP Plus but including arrearage forgiveness co-pay charges are:

		2015	2016	2017
% of Income	0-50	7.44%	7.48%	7.47%
	51-100	7.27%	7.32%	7.30%
	>100	8.68%	8.78%	8.77%
Avg of Payments	0-50	7.73%	6.47%	5.68%
	51-100	4.40%	3.99%	3.95%
	>100	2.96%	2.63%	2.61%
% of Bill	0-50	8.89%	7.81%	7.74%
	51-100	4.94%	4.36%	4.54%
	>100	3.39%	2.99%	3.09%
Minimum Payme	0-50	17.99%	18.45%	20.47%
	51-100	4.75%	4.43%	3.91%
	>100	2.93%	2.40%	1.99%
Senior CAP	0-50	None	None	None
	51-100	6.38%	5.33%	5.56%
	>100	2.78%	2.34%	3.65%

Question No. CAUSE-PA 2-012
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-012:

For calendar years 2015, 2016, and 2017, please separately identify the number of CAP customers with a total energy burden (including CAP Plus and arrearage forgiveness co-pay) of 3%, 4%, 5%, 6%, 7%, 8%, 9%, 10%, 11%, 12%, 13%, 14%, 15%, 16%, 17%, 18%, 19%, and 20%+, disaggregated by year, income level, and payment plan type. To the extent there are any CAP customers in the 20%+ category, please identify the highest energy burden within that category for each of the three years.

Response:

Please see CAUSE-PA 2-012 Attachment A for the breakdown of energy burden as requested. The highest energy burden are as follows:

2015 – 206%
2016 – 186%
2017 – 330%

Each customer above was/is on the minimum payment option.

2015	Percent of Income			Avg of Payments			% of Bill			Minimum Payment			Senior CAP		
	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100
0.03	1	2	0	16	653	1546	1	400	1788	1	25	44	0	0	1
0.04	0	0	0	54	728	838	20	793	1256	5	34	23	0	0	3
0.05	0	0	0	123	854	444	55	979	914	12	30	13	0	0	0
0.06	0	0	0	160	762	237	118	937	525	6	27	6	0	0	0
0.07	0	0	0	193	586	98	152	779	230	10	16	0	0	1	0
0.08	340	948	57	241	461	41	192	604	116	19	24	4	0	1	0
0.09	839	777	31	166	119	13	208	305	56	48	22	0	0	0	0
0.1	303	62	71	62	37	10	89	84	19	83	4	1	0	0	0
0.11	65	5	86	37	13	2	46	46	2	96	0	0	0	0	0
0.12	0	0	16	26	6	1	29	21	1	147	1	0	0	0	0
0.13	0	0	11	15	5	0	20	9	0	52	0	0	0	0	0
0.14	0	0	0	13	4	0	16	7	1	34	0	0	0	0	0
0.15	0	0	0	7	0	0	13	6	0	38	0	0	0	0	0
0.16	0	0	0	13	0	0	15	1	0	113	0	0	0	0	0
0.17	0	0	0	5	0	0	5	0	0	15	0	0	0	0	0
0.18	0	0	0	5	0	0	11	1	0	80	0	0	0	0	0
0.19	0	0	0	2	0	0	3	1	0	19	0	0	0	0	0
0.2	0	0	0	3	0	0	4	0	0	11	0	0	0	0	0
0.2+	0	0	0	58	0	0	61	1	0	321	0	1	0	0	0

2016	Percent of Income			Avg of Payments			% of Bill			Minimum Payment			Senior CAP		
	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100
0.03	0	0	0	25	823	1970	4	695	2417	2	33	69	0	0	2
0.04	1	0	0	75	858	757	33	1049	1286	2	30	12	0	0	1
0.05	0	0	0	160	919	345	116	1090	789	1	18	10	0	0	0
0.06	0	0	0	191	736	173	144	907	356	8	14	4	0	3	0
0.07	0	0	0	189	475	58	170	632	152	10	11	2	0	1	0
0.08	334	901	49	181	284	30	183	404	83	29	21	1	0	0	0
0.09	901	937	36	78	62	12	104	163	15	67	12	0	0	0	0
0.1	305	76	80	25	17	7	54	52	9	101	4	3	0	0	0
0.11	141	22	94	20	10	0	33	20	0	139	0	0	0	0	0
0.12	0	0	23	10	2	0	27	10	1	112	1	0	0	0	0
0.13	0	0	12	9	2	0	12	8	0	49	0	0	0	0	0
0.14	0	0	1	18	2	0	10	4	0	83	0	0	0	0	0
0.15	0	0	0	8	1	0	6	2	0	46	0	0	0	0	0
0.16	0	0	0	9	0	0	7	1	0	75	0	0	0	0	0
0.17	0	0	0	8	0	0	4	1	0	49	0	0	0	0	0
0.18	0	0	0	3	0	0	9	2	0	55	0	0	0	0	0
0.19	0	0	0	1	0	0	7	0	0	33	0	0	0	0	0
0.2	0	0	0	1	0	0	3	0	0	13	0	0	0	0	0
0.2+	0	0	0	33	1	0	36	0	0	364	0	0	0	0	0

2017	Percent of Income			Avg of Payments			% of Bill			Minimum Payment			Senior CAP		
	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100	<50	50 - 100	>100
0.03	0	0	0	41	1048	2260	9	808	2853	1	17	57	0	0	0
0.04	0	0	0	109	1006	728	60	1261	1406	4	14	11	0	0	2
0.05	0	0	0	190	995	302	133	1273	841	3	16	2	0	0	1
0.06	0	1	0	228	739	143	180	1090	393	4	8	1	0	1	0
0.07	0	0	0	199	439	50	203	735	167	1	3	1	0	1	0
0.08	1199	1525	68	120	162	14	187	422	60	20	4	0	0	0	0
0.09	718	604	5	35	16	9	87	132	18	116	2	1	0	0	0
0.1	254	25	93	9	5	3	30	46	6	173	0	0	0	0	0
0.11	0	0	35	7	2	0	25	18	1	232	0	0	0	0	0
0.12	0	0	20	2	0	0	16	7	0	82	0	0	0	0	0
0.13	0	0	0	5	2	0	10	10	0	49	0	0	0	0	0
0.14	0	0	0	5	1	1	14	0	0	149	0	0	0	0	0
0.15	0	0	0	3	0	0	8	1	0	34	0	0	0	0	0
0.16	0	0	0	2	0	0	5	0	0	20	0	0	0	0	0
0.17	0	0	0	3	0	0	7	1	0	151	0	0	0	0	0
0.18	0	0	0	0	0	0	3	1	0	19	0	0	0	0	0
0.19	0	0	0	2	0	0	3	0	0	58	0	0	0	0	0
0.2	0	0	0	1	1	0	3	0	0	22	0	0	0	0	0
0.2+	0	0	0	8	0	0	29	0	1	494	0	0	0	0	0

Question No. CAUSE-PA 2-013
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-013:

How often does Columbia assess a CAP customer's payment plan type?

Response:

Columbia manually assesses a CAP payment plan at intake, at every reverification, when a customer moves and the budget is lower than the payment plan option and any time a CAP customer calls in requesting a lower plan or expressing concern of an inability to pay.

For those customers on Percent of Budget, the payment plan is automatically reviewed and adjusted annually when budgets are reviewed and promoted.

Question No. CAUSE-PA 2-014
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-014:

What is the process that Columbia uses to solicit a CAP customer to recertify their income? Please identify all points of contact and the timing for each point of contact, and provide a copy of all documents, letters, or other correspondence used to solicit CAP customer recertification.

Response:

CAP customers are required to provide proof of income annually, with the following exceptions:

- CAP customers who receive LIHEAP, Dollar Energy Fund, or another Columbia Universal Services program; and
- CAP customers aged 60 and older who receive Social Security or Disability benefits are required to provide proof of income every other year.

Columbia issues notification letters requiring income re-verification each year to customers 30 days prior to each customer's CAP enrollment anniversary date. CAP participants are then required to mail or fax verification of their household income to the Administrating Organization for processing. In turn, the customer will receive a letter from the Administrating Organization verifying the customer's continued participation in CAP and detailing any changes made to their required CAP payment. For customers preferring to re-verify in person, appointments can be made available with a screening agency.

Columbia will remove from CAP any customer who fails to re-verify income within 30 days after the anniversary date and 60 days after the issuance of the notification letter that verified income is required.

Question No. CAUSE-PA 2-014

Respondent: D. Davis

Page 2 of 2

Customers who claim zero income will be required to verify their income after three months of participation. A customer will continue to be required to verify their income every three months for as long as they verify at zero income. Income verification will include completing a form documenting zero income.

Prior to removing a customer from CAP for lack of re-verification, Columbia will partner with electric utility CAP programs to obtain proper verification, in an attempt to retain the customer in CAP.

Once removed for failure to re-verify income, a customer will be re-entered into CAP immediately after eligible proof of income is received.

Please see CAUSE-PA 2-014 Attachment A for the initial letter sent to customers that received an energy assistance grant on their Columbia Gas account in the past twelve months.

Please see CAUSE-PA 2-014 Attachment B for the initial letter sent to customers that have not received energy assistance on their Columbia Gas account in the past twelve months and are required to re-verify their income.

Please see CAUSE-PA 2-014 Attachment C for the reminder letter sent to those that are required to re-verify income and have not provided documentation.

Please see CAUSE-PA 2-014 Attachment D for the notification of removal from CAP for failing to re-verify their income.

Date

Name
Address

Dear:

It is now time to update your application in Columbia Gas' Customer Assistance Program. When you were enrolled into CAP you agreed to provide proof of your household members and income once every year. Since you have received an Energy Assistance grant on your Columbia Gas account in the past twelve months, you do not need to reverify unless there have been changes in your household size.

If there has been any changes that make it necessary to re-verify, please send proof of these changes to **COLUMBIA CAP, PO Box 42329, Pittsburgh, PA 15203.**

You may also fax the information at **412-431-2085.**

Each year you apply for, and receive an Energy Assistance grant on your Columbia Gas bill you will not need to re-verify your income.

If you have any questions concerning this letter, you may call Columbia CAP toll free telephone number, 1-888-282-6816, for assistance.

Sincerely,

COLUMBIA GAS OF PENNSYLVANIA
CUSTOMER ASSISTANCE PROGRAM

CAUSE-PA 2-014
Attachment B
Pg 1 of 1

Date

Name:

Address:

Dear _____

It is now time to update your application for Columbia Gas' Customer Assistance Program (CAP).

At the time you were enrolled into CAP, you agreed to identify all your household members and verify their incomes, along with yours, once every year. Please mail in proof of your household income to Columbia CAP, Box 42329, Pittsburgh, PA 15203. You may also fax the information at 412-431-2085.

This information must be returned within 30 days. There is only a limited time to update your application. Failure to do so may result in removal from CAP.

Please Note: If you received energy assistance in the last 12 months, you do not need to reverify your income. Please report any changes in household size by calling Columbia CAP.

If you are in need of assistance in completing this requirement or if you have any questions concerning this letter, you may call Columbia CAP toll-free telephone number, 1-888-282-6816, for assistance.

Sincerely,

COLUMBIA GAS OF PENNSYLVANIA
CUSTOMER ASSISTANCE PROGRAM

Dear:

As a requirement to remain a participant in Columbia's Customer Assistance Program, you agreed to re-verify your income yearly.

At this time you are in danger of being removed from Columbia's CAP program because you have failed to send in documentation of your income to Columbia CAP.

Proof of income should be sent to:

Columbia CAP
PO Box 42329
Pittsburgh, PA 15203

You may also fax the information at 412-431-2085.

Please send in documentation of your income immediately to insure your continued participation in the CAP program, which allows you to pay a reduced gas bill.

If you have any questions, feel free to contact Columbia CAP at 1-888-282-6816.

Sincerely,

Columbia CAP

Dear :

You were asked to re-verify your income in order to remain in the CAP program. Because you have failed to comply with the terms of the program, we must remove you from the CAP program. Your account will be returned to Columbia Gas of Pennsylvania's credit and collections department. You should call 1-888-460-4332 to make payment arrangements.

You may be able to reenter CAP if you mail in proof of your household income to Columbia CAP, Box 42329, Pittsburgh, PA 15203 or you may fax the information to 412-431-2085.

If you have any questions or you feel you were denied in error, please call Columbia CAP at 888-282-6816

Sincerely,

Columbia CAP

Question No. CAUSE-PA 2-018
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 2

Question No. CAUSE-PA 2-018:

For calendar years 2015, 2016, and 2017, how many CAP customers were removed from CAP for the following reasons, disaggregated by month:

- a. Failure to Recertify
- b. Non-Payment
- c. Failure to Submit to LIURP Audit
- d. Other (please identify all of the reasons not otherwise listed).

Response:

Please see chart below for the counts and reasons customers are removed from CAP. The 'Other' category includes but is not limited to a customer is discovered to have two addresses, unreported rental property with no response, new CAP payment is higher than the budget, or we receive confirmation that the ratepayer no longer lives at the address.

Question No. CAUSE-PA 2-018
 Respondent: D. Davis
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		January	February	March	April	May	June	July	August	September	October	November	December
2015	Non Payment	0	0	0	57	82	123	124	73	79	43	41	0
	Failure to Recertify	99	75	134	153	155	243	188	181	132	95	147	132
	Deceased	3	2	4	1	2	0	0	2	0	0	0	1
	Moved	143	137	183	172	178	227	209	201	199	196	192	189
	Customer Request	2	1	2	3	5	0	1	4	0	3	2	0
	Failure to Weatherize	0	3	4	3	0	0	3	2	0	0	0	0
	Over Income*	0	0	0	0	0	0	0	0	0	0	0	10
	Other	31	34	45	75	44	69	59	42	61	42	58	33
2016	Non Payment	0	0	0	112	123	78	84	67	69	55	41	0
	Failure to Recertify	86	113	166	165	181	187	214	177	197	161	145	93
	Deceased	2	0	0	0	3	0	0	2	1	2	2	1
	Moved	137	143	159	222	189	215	186	234	208	172	196	162
	Customer Request	1	1	0	6	8	3	4	4	5	5	1	5
	Failure to Weatherize	0	1	0	1	4	15	8	4	1	6	0	1
	Over Income	20	42	48	35	51	43	33	43	33	39	32	39
	Other	33	8	6	18	14	13	18	14	12	11	6	6
2017	Non Payment	0	0	0	75	127	107	133	152	101	79	34	0
	Failure to Recertify	109	97	146	162	210	239	206	269	170	225	199	174
	Deceased	2	0	2	4	1	0	2	2	2	2	6	1
	Moved	157	172	206	194	226	254	237	262	239	272	226	185
	Customer Request	1	1	8	5	4	7	4	4	3	1	2	2
	Failure to Weatherize	10	0	0	3	0	7	2	0	0	0	0	0
	Over Income	38	26	39	42	49	44	39	38	40	47	33	22
	Other	6	4	9	23	17	24	13	28	22	28	11	4
	*Began tracking separately in December, 2015												

Question No. CAUSE-PA 3-001
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 3

Question No. CAUSE-PA 3-001:

See Tariff Gas – Pa. PUC No. 9, Eighth Revised Page No. 60, Rule 17.4, Payment of Cash Deposit and 66 Pa. C.S. § 1404(a.1) (cash deposit prohibition). Does CPA charge a security deposit for CAP-eligible customers? If no, please describe the process which Columbia uses to inform consumers of the security deposit prohibition, and provide a copy of CPA's internal policies, training documents, and call scripts which reference or describe the policy and procedures associated with the security deposit prohibition.

Response:

CPA does not charge a security deposit for CAP-eligible customers. If a customer expresses concern over payment of a security deposit during a call to connect service, the customer will be asked to provide financial information. If the customer verbally verifies their income is level 1 (less than 150% of poverty), the security deposit will be waived.

Please see CONFIDENTIAL Attachment A to this response for excerpts from the call aid system which houses all processes and scripts used by customer service representatives when taking calls.

Question No. CAUSE-PA 3-009
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 3

Question No. CAUSE-PA 3-009:

Does Columbia have a standard medical certificate form? If so, please identify whether use of Columbia's standard form is mandatory or optional, and provide a copy of the form.

Response:

Yes, a standard form is used. Please see Attachment A for a copy of this form.

This form, as approved by the PA Public Utility Commission, is optional.

The Company will also accept a written document from a healthcare professional (licensed physician, physician's assistant, or nurse practitioner) as long as it is on valid letterhead from the physician's practice and signed by the healthcare professional.

Columbia Gas
of Pennsylvania

A NiSource Company

REQUEST FOR MEDICAL CERTIFICATION
(Solicitud De Un Certificado Medico)

Dear Physician, Physician Assistant, or Nurse Practitioner:

Gas service could be shut off at the service address below unless you certify that the individual listed on this form has an illness or condition that would be aggravated by the absence of utility service. If the gas service has already been shut off, this certification will be used to reconnect service due to the medical necessity.

All requested information on this form must be completed for this medical certificate to be valid. Please note that certification is only accepted from a licensed physician, physician assistant, or nurse practitioner.

FOR COMPANY USE ONLY

Account No: _____	Mailing Date: May 18, 2018
Name and Service Address of Customer: Name: _____ Address: _____ City: _____ State: _____ Zip: _____	Address: Columbia Gas of Pennsylvania PO Box 910 Smithfield, PA 15478
<input type="checkbox"/> Mail to Customer	Phone No: 1-888-460-4332
<input type="checkbox"/> Fax to Doctor / Fax No:	Fax No: 1-866-724-0036

Name of Seriously Ill Person: _____
Address of Seriously Ill Person: _____ _____
Relationship to Customer: _____

TO BE COMPLETED BY LICENSED PHYSICIAN, PHYSICIAN ASSISTANT, OR NURSE PRACTITIONER

Please indicate your title: <input type="checkbox"/> Physician <input type="checkbox"/> Physician Assistant <input type="checkbox"/> Nurse Practitioner	
Physician/PA/NP Name: _____	License Number: _____
Office Address: _____ _____	
Office Phone #: _____	<input type="checkbox"/> ACCEPT <input type="checkbox"/> DENY
Anticipated Length of Illness: _____	

I certify that in my professional opinion the above patient is ill and that this condition would be aggravated by the absence of gas service. This certificate is valid for the expected length of the illness, up to a maximum of 30 days, unless it is renewed.

(Physician, Physician Assistant, or Nurse Practitioner
Signature)

THE CUSTOMER STILL HAS THE RESPONSIBILITY TO MAKE A REASONABLE PAYMENT ARRANGEMENT AND PAYMENT ON ALL CURRENT UNDISPUTED BILLS OWED TO THE UTILITY.

Question No. CAUSE-PA 3-010
Respondent: D. Davis
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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 3

Question No. CAUSE-PA 3-010:

Under what circumstances does Columbia grant a fourth request for a medical certificate?

Response:

At the time an initial medical certificate goes into effect the account balance is captured and saved. The customer can then have two renewals on this same balance. If the saved account balance has not been paid off after two renewals, further renewals are not allowed.

If the saved balance has been paid, a 4th request (3rd renewal) will be processed to see if a medical certificate can be validated.

Question No. CAUSE-PA 4-002

Respondent: D. Davis

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COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 4

Question No. CAUSE-PA 4-002:

See Columbia's response to CAUSE-PA 1-001: "As always, any customer that feels they cannot afford their current CAP payment plan, can contact the company and be re-evaluated for a lower option if available."

Please identify all communications, written or verbal, which inform CAP participants of their right to be re-evaluated for a lower payment option, and provide a copy of the communication or call script where this information is conveyed.

Response:

Every letter sent to a CAP customer ends with this statement. "If you have any questions concerning your CAP account or the program in general, please call The Universal Service Representative at **1-800-537-7431**."

Below is a confidential excerpt from the call script which outlines the procedure related to customer calls expressing they cannot afford their CAP payment.

APPENDIX C

Energy Assistance Summary (EASUM) Prepared by the Pennsylvania Department of Human Services for the period of 9/16/2017 through 5/17/2018

Energy Assistance Summary (EASUM)

9/16/2017 - 5/17/2018

STATE WIDE

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG		ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	127,244	\$32,044,537	37	\$252	PAYMENT SENT	Electric	100,270	\$26,761,880	29	\$267
	Renter	161,325	\$43,285,600	47	\$268		FuelOil	56,658	\$15,395,063	17	\$272
	RenterWithHeat	5,085	\$657,764	1	\$129		Coal	2,200	\$531,610	1	\$242
	SubsidizedWithHeat	400	\$114,596	0	\$286		NaturalGas	165,914	\$42,330,237	48	\$255
	SubsidizedNoHeat	44,605	\$12,372,030	13	\$277		Kerosene	5,143	\$1,446,668	1	\$281
	Roomer	218	\$37,384	0	\$171		Propane	10,682	\$2,781,244	3	\$260
	Other	4,297	\$1,366,668	1	\$318		WoodOrOther	1,270	\$344,516	0	\$271
								BlendedFuel	1,037	\$287,361	0
RACE	AmericanIndian	565	\$160,904	0	\$285	INCOME RANGE	0 - 999	18,177	\$15,182,637	5	\$835
	Other	28,067	\$7,211,957	8	\$257		1000 - 1999	3,603	\$2,766,992	1	\$768
	NativeHawaiian	180	\$47,209	0	\$262		2000 - 2999	3,392	\$2,420,809	1	\$714
	Black	87,809	\$23,570,931	26	\$268		3000 - 3999	4,838	\$2,762,004	1	\$571
	White	217,678	\$56,634,071	63	\$260		4000 - 4999	5,068	\$2,077,635	1	\$410
	Asian	5,952	\$1,434,351	2	\$241		5000 - 5999	5,218	\$1,858,895	2	\$356
	Unknown	2,923	\$819,156	1	\$280		6000 - 6999	6,305	\$1,969,451	2	\$312
								7000 - 7999	7,757	\$2,117,055	2
DISABLED	YES	157,360	\$33,553,826	46	\$213	8000 - 8999	12,091	\$2,875,432	4	\$238	
	NO	185,814	\$56,324,753	54	\$303	9000 - 9999	57,696	\$12,252,686	17	\$212	
AGE 60 & ABV	YES	126,822	\$27,552,584	37	\$217	10000 - 10999	17,094	\$3,453,032	5	\$202	
	NO	216,352	\$62,325,995	63	\$288	11000 - 11999	19,401	\$3,856,455	6	\$199	
AGE 5 & BLW	YES	66,194	\$18,547,325	19	\$280	12000 - 12999	19,181	\$3,803,894	6	\$198	
	NO	276,980	\$71,331,254	81	\$258	13000 - 13999	21,273	\$4,220,500	6	\$198	
PAY_TYPE	DIRECT	6,848	\$1,357,198	2	\$198	14000 - 14999	17,587	\$3,488,400	5	\$198	
	PROVIDER	337,720	\$88,843,322	98	\$263	15000 - 15999	18,427	\$3,654,700	5	\$198	
REFUNDS		6,518	\$1,122,272		\$172	16000 - 16999	14,878	\$2,954,400	4	\$199	
						17000 - 17999	12,392	\$2,464,161	4	\$199	
						18000 - 18999	13,262	\$2,636,600	4	\$199	
						19000 - 19999	8,612	\$1,714,291	3	\$199	
						> 19999	56,918	\$11,347,700	17	\$199	
						PAYMENT TYPE	Regular	343,174	\$89,878,579		\$262
						Reissue	202	\$43,312		\$214	
						Secondpay	582	\$175,045		\$301	
					Underpay	173	\$33,608		\$194		
					Extraordinary	437	\$69,976		\$160		
					TOTAL PMT		344,568	\$90,200,520		\$262	
					RECOUPMENTS		239	\$58,561		\$245	
					NET PAID			\$90,141,959			
					PMT SUB TYPE	APD	0	\$0		\$0	
						STD	344,568	\$90,200,520		\$262	

AVERAGE HOUSEHOLD SIZE: 2.31

* Counts, Amounts (\$), % and AVG from HOUSING, RACE, DISABLED, OVER-60 and INCOME RANGE category are from Regular payments only

** Counts, Amounts (\$), % and AVG from PAY_TYPE category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

*** Counts, Amounts (\$), % and AVG from PAYMENT_SENT category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

May 3, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

Dear Ms. Marx:

Enclosed please find copies of the following responses of Columbia Gas of Pennsylvania, Inc. to Set 1 of the CAUSE-PA interrogatories in the referenced proceeding:

Cause PA Set 1: 001 through 019

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Theodore J. Gallagher". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Theodore J. Gallagher

/kak
Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5-3-2018


Michael Davidson
Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

May 18, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

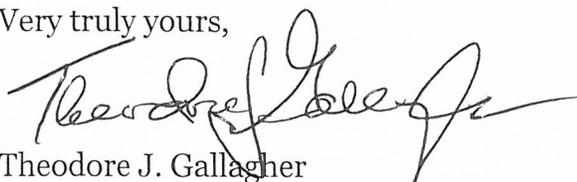
Dear Ms. Marx:

Enclosed please find copies of the following responses of Columbia Gas of Pennsylvania, Inc. to Set 2 of the CAUSE-PA interrogatories in the referenced proceeding:

Cause-PA Set 2: 001 through 003
 005 through 011
 013 through 024

Thank you for your attention to this matter.

Very truly yours,


Theodore J. Gallagher

/kak
Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

3-18-2018



Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

May 21, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

Dear Ms. Marx:

Enclosed please find copies of the following responses of Columbia Gas of Pennsylvania, Inc. to Set 2 of the CAUSE-PA interrogatories in the referenced proceeding:

Cause-PA Set 2: 004, 012, 025

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Theodore J. Gallagher". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Theodore J. Gallagher

/kak
Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5-21-2018



Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

May 30, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

Dear Ms. Marx:

Enclosed please find copies of the following Confidential responses of Columbia Gas of Pennsylvania, Inc. to Set 3 of the CAUSE-PA interrogatories in the referenced proceeding:

CAUSE Set 3: 001, 005, 007, 011

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Theodore J. Gallagher".

Theodore J. Gallagher

/kak

Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5-30-2010


Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6347
mbielanin@nisource.com

Meagan B. Moore
Counsel
Legal Department

May 29, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

Dear Ms. Marx:

Enclosed please find copies of the following responses of Columbia Gas of Pennsylvania, Inc. to Set 3 of the CAUSE-PA interrogatories in the referenced proceeding:

CAUSE Set 3: 008 through 010
 013 through 016

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "MB Moore".

Meagan B. Moore

/kak
Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5-29-2018



Michael Davidson
Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.

Theodore J. Gallagher
Assistant General Counsel
Legal Department



121 Champion Way, Suite 100
Canonsburg, PA 15317
Office: 724.416.6355
Fax: 724.416.6382
tjgallagher@nisource.com

May 31, 2018

VIA: E-MAIL AND FIRST CLASS MAIL

Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

**Re: Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2018-2647577**

Dear Ms. Marx:

Enclosed please find copies of the following Confidential response of Columbia Gas of Pennsylvania, Inc. to Set 4 of the CAUSE-PA interrogatories in the referenced proceeding:

CAUSE Set 4: 002

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Theodore J. Gallagher". The signature is fluid and cursive.

Theodore J. Gallagher

/kak

Enclosure

cc: Rosemary Chiavetta, Secretary (cover letter and certificate of service only)
Certificate of Service (w/enc.)

VERIFICATION

I, Michael Davidson, General Manager and Vice President for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5-31-2018


Michael Davidson
Michael Davidson
General Manager and Vice President
Columbia Gas of Pennsylvania, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility	:	
Commission	:	
	:	Docket No. R-2018-2647577
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

VERIFICATION

I, Mitchell Miller, verify that CAUSE-PA Statement 1, the Direct Testimony of Mitchell Miller, and Attachment A thereto; CAUSE-PA Statement 1-R, the Rebuttal Testimony of Mitchell Miller; and CAUSE-PA Statement 1-SR, the Surrebuttal Testimony of Mitchell Miller were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief.

I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Mitchell Miller
60 Geisel Rd.
Harrisburg, PA 17112
mitchmiller77@hotmail.com

Date: July 23, 2018