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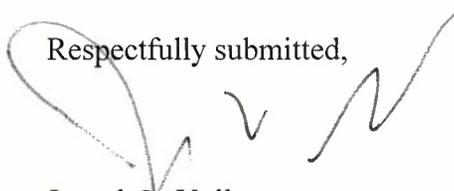
Administrative Law Judge Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place
Suite 220
301 5th Avenue
Pittsburgh, PA 15222

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

Dear Judge Watson:

Enclosed please find a copy of Community Action Association of Pennsylvania's Statement No. 1-S, Surrebuttal Testimony of Susan A. Moore. As indicated below, I am serving all parties of record with a hard copy of the enclosed. I served all parties via first class mail and electronically on today's date. If you need anything further, please do not hesitate to contact me.

Respectfully submitted,


Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA

CAAP Statement No. 1-S

Surrebuttal Testimony of Susan A. Moore

In Re: Pennsylvania Public Utility Commission v.
Columbia Gas of Pennsylvania, Inc.

Docket Number: R-2018-2647577

1 **Q. Please state your name, title, and business address.**

2 **A.** My name is Susan A. Moore, Chief Executive Officer, Community Action
3 Association of Pennsylvania, 222 Pine Street, Harrisburg, PA 17101.

4

5 **Q. On whose behalf are you testifying?**

6 **A.** The Community Action Association of Pennsylvania (CAAP), a statewide
7 association of local Community Action Agencies in Pennsylvania.

8

9 **Q. Have you submitted testimony in this case?**

10 **A.** Yes. I submitted direct testimony, CAAP Statement No. 1.

11

12 **Q. What did you address in your direct testimony?**

13 **A.** I opposed the Company's proposal to increase its fixed residential monthly
14 customer charge and recommended that its proposed Revenue Normalization Adjustment
15 (RNA) be denied. I also proposed an increase in LIURP funding and that the Company
16 use member agencies of the Community Action Association of Pennsylvania and
17 Pennsylvania Weatherization Providers Task Force in the development, implementation
18 and administration of its LIURP program.

19

20 **Q. What is the purpose of your surrebuttal testimony?**

21 **A.** I want to address the rebuttal testimony of Company witness Deborah A. Davis,
22 Columbia Statement 14-R.

23

1 **Q. What part of Ms. Davis' testimony do you want to address?**

2 **A.** In her testimony she indicates that the Company opposes any increase to LIURP
3 funding and in support of that position asserts in part that not all of 2017 funding was
4 spent, with 5% of the allocated funding being rolled over into 2018, and states that the
5 Company's LIURP contractors are having trouble keeping up with the current funding
6 level of \$4,750,000. (Columbia Stmt. 14-R, p. 13-14.)

7
8 **Q. How would you like to respond?**

9 **A.** Initially, as indicated in my direct testimony there is an unmet need for LIURP
10 services in the Company's territory. The Company estimates that it serves 101,375 low-
11 income households with 67,711 confirmed as low-income and estimates that 18,647
12 households are eligible for LIURP services. Further, it is the responsibility of the
13 Company to begin to meet that need through better management of its LIURP program.
14 The fact that the Company has failed to meet its LIURP targets is not the fault of its low-
15 income customers, who benefit greatly from LIURP services. If allocated funding is not
16 being spent then the Company has to take steps to make sure that it is spent and any
17 failure to do so is not a reason to oppose a funding increase to meet the unmet need for
18 those services.

19
20 **Q. Does this conclude your testimony?**

21 **A.** Yes

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A handwritten signature in black ink, appearing to read 'J. Vullo', is written above a horizontal line.

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