



October 13, 2022

VIA EFILE

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: National Fuel Gas Distribution Corporation's Universal Service and Energy Conservation Plan for 2022-2026; Docket No. M-2021-3024935

Letter of CAUSE-PA in lieu of Answer to Petition to Adopt a Percent of Income Payment (PIP) Program and to Implement Other Technical Changes to NFG's Approved 2022-2026 USECP

Dear Secretary Chiavetta:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) submits the following Letter in lieu of a formal Answer to the Petition of NFG to Adopt a Percent of Income Payment (PIP) Program and to Implement Other Technical Changes to NFG's Approved 2022-2026 Universal Service and Energy Conservation Plan (USECP or Plan), which was filed with the Commission on October 12, 2022. As explained herein, CAUSE-PA supports NFG's Petition, and urges the Commission to review and approve NFG's proposal without delay.

On March 31, 2021, NFG filed its USECP for 2022-2026, including modifications to amend its universal service program offerings to improve customer affordability. On May 3, 2022, the Public Utility Commission (Commission) entered an Order approving NFG's USECP (May 3 Order), with certain modifications. On May 18, 2022, NFG filed a Petition for Reconsideration (May 18 Petition), requesting the Commission suspend regulatory deadlines for implementation of NFG's Customer Assistance Program, Low Income Ratepayer Assistance (LIRA). This suspension request was to allow NFG to make necessary IT upgrades for the new Plan, given NFG's intention to file a USECP amendment installing a PIP program, replacing the existing,

approved updates to its LIRA discount program. CAUSE-PA indicated its non-opposition to the May 18 Petition.

On July 14, 2022, the Commission entered an Order responsive to NFG's May 18 Petition directing the Company to file the instant Petition within 90 days of the entry of the Order. The Order entered on July 14 additionally stayed the LIRA IT deadlines specified in the May 18 Petition, approved NFG's Plan Compliance Filing (filed June 14, 2022), and directed NFG to implement all amendments to its USECP approved or directed by the Commission's May 3 Order, excepting the LIRA IT changes specified in the May 18 Petition.

CAUSE-PA has been an active participant throughout this proceeding and is supportive of the modifications to NFG's USECP proposed in the instant Petition, set forth in Exhibits A-1 and A-2 to the Petition. As noted in the current Petition, CAUSE-PA collaborated with NFG and the Office of Consumer Advocate (OCA) to develop the PIP Program as described in the Petition.

CAUSE-PA is appreciative of the collaborative process employed by NFG and is supportive of the PIP modifications developed in consultation with CAUSE-PA and with OCA. The revisions set forth in the Petition and the proposed USECP represent meaningful improvements to the affordability of NFG's universal service programs and are in line with the energy burden standards set forth in the Commission's CAP Policy Statement. As such, CAUSE-PA urges expedited consideration and approval of the Petition and the proposed revised USECP so that NFG's low income customers can access these program improvements.

Sincerely,



Ria M. Pereira, Esquire
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Counsel for CAUSE-PA

Cc: Certificate of Service
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

National Fuel Gas Distribution Corporation’s Universal :
Service and Energy Conservation Plan for 2022-2026 :
 : Docket No. M-2021-3024935
Petition to Adopt a Percent of Income Payment Program and :
to Implement Other Technical Changes to National Fuel’s :
Approved Plan :

Certificate of Service

I hereby certify that I have, on this day, served copies of the **Letter in lieu of Answer to the Petition for Reconsideration of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL

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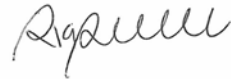
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Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
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