

COMMONWEALTH OF PENNSYLVANIA



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August 7, 2023

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

Re: Columbia Gas of Pennsylvania, Inc. Universal
Service and Energy Conservation Plan for
2024-2028 Submitted in Compliance with
52 Pa. Code § 62.4
Docket No. M-2023-3039487

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

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*350043

CERTIFICATE OF SERVICE

Columbia Gas of Pennsylvania, Inc. Universal :
Service and Energy Conservation Plan for : Docket No. M-2023-3039487
2024-2028 Submitted in Compliance with :
52 Pa. Code § 62.4 :

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

Dated this 7th day of August 2023.

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Columbia Gas of Pennsylvania, Inc. Universal :
Service and Energy Conservation Plan for : Docket No. M-2023-3039487
2024-2028 Submitted in Compliance with :
52 Pa. Code § 62.4 :

COMMENTS
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I. INTRODUCTION

The Office of Consumer Advocate (OCA) files these Comments pursuant to the directive in the Commission's Order Directing Supplemental Information and Establishing Comment Period (Columbia Gas of Pennsylvania 2024-2028)¹ entered June 15, 2023.²

A. Background

On April 5, 2023, Columbia Gas of Pennsylvania Inc. (Columbia) filed a proposed Universal Service and Energy Conservation Plan (USECP) for 2024-2028 (*Proposed 2024 USECP*).

Pursuant to a November 5, 2019 Order, the Commission's CAP Policy Statement was amended effective March 21, 2020. *See 2019 Amendments to Policy Statement on Customer Assistance Programs, 52 Pa. Code § 69.261-69.267*, Docket No. M-2019-3012599, Final Policy Statement and Order (Nov. 5, 2019) (*Final CAP Policy Statement Order*). In the *Final CAP Policy Statement Order* the Commission urged electric distribution companies (EDCs) and natural gas distribution companies (NGDCs) to incorporate CAP policy amendments into their USECPs.

By Order entered on October 3, 2019, (*October 2019 Order*) in Universal Service and Energy Conservation Plan Filing Schedule, Docket No. M-2019-3012601, the Commission

¹ *Columbia Gas of Pennsylvania, Inc. Universal Service and Energy Conservation Plan for 2024-2028 Submitted in Compliance with 52 Pa. Code § 62.4*, Docket No. M-2023-3039487, Order Directing Supplemental Information and Establishing Comment Period (June 15, 2023) (*June 15, 2023 Order*).

² The OCA was assisted in the preparation of these Comments by its consultant, Roger D. Colton, and its regulatory analyst, Nicholas DeMarco. Roger Colton is a principal in the firm of Fisher, Sheehan & Colton, Public Finance and General Economics. Mr. Colton provides technical assistance to a variety of public utilities, state agencies, and consumer organizations on rate and customer service issues for telephone, water/sewer, natural gas and electric utilities. Mr. Colton's work focuses on low-income energy issues, and he has testified and published extensively in this area.

Nicholas A. DeMarco is a Regulatory Analyst for the Pennsylvania Office of Consumer Advocate. He assists in the research and writing of policy and testimony. Mr. DeMarco has a Master's Degree in Political Science from Lehigh University and a Bachelor's of Arts in Political Science and Public Policy from Bloomsburg University of Pennsylvania.

established a new USECP filing schedule and extended the duration of USECPs from three years to at least five years. The filing schedule for third-party independent evaluations was adjusted to coincide with the revised USECP duration and filing schedule. With that Order, the Commission extended Columbia's 2019-2021 USECP through 2023 and set the due date for Columbia's next five-year USECP (2024-2028) as April 1, 2023.

In response to the *October 2019 Order* at Docket No. M-2019-3012601, on January 6, 2020, Columbia filed an Addendum (January 2020 Addendum) at its 2019 USECP docket. The January 2020 Addendum reflected the extended duration through 2023 for its 2019 USECP and included, *inter alia*, updated enrollment and budget projections for 2022 and 2023.

On May 10, 2023, Commission staff in the Bureau of Consumer Services (BCS) convened a telephonic meeting to allow stakeholders an opportunity to provide their informal comments and questions about the Proposed 2023 USECP prior to issuance of a Commission order. Representatives from Columbia, Coalition for Affordable Utility Service and Energy-Efficiency in Pennsylvania (CAUSE-PA), OCA, the Office of Small Business Advocate (OSBA), the Bureau of Investigation and Enforcement (I&E), and the Pennsylvania Coalition of Local Energy Efficiency Contractors (PA-CLEEC) participated in the meeting.

The Commission issued an Order Requesting Additional Information and Comments in June 2023 (hereinafter *June 15, 2023 Order*) in response to the Petition. *See June 15, 2023 Order*. In the *June 15, 2023 Order* directed Columbia to provide Supplemental Information and invited stakeholders to comment on issues raised in this Order, any aspect of the Proposed 2024 USECP, or issues related to Columbia's universal service policies or procedures. Columbia's current 2019 USECP remains in effect, in whole or in part, until replaced, in whole or in part, consistent with Commission issued orders or Secretarial letters. As a part of its *June 15, 2023 Order*, the

Commission requested Supplemental Information be provided within 30 days and requested that the interested parties provide Comments within 20 days after that information was provided. Order at 1. On July 17, 2023, the Company provided the requested Supplemental Information.³

In its Plan, Columbia proposes the following USECP modifications:

(1) shifting staff to improve efficiencies of the LIHEAP team and to provide more emphasis on grassroots outreach (Proposed 2024-2028 Amended USECP at 10);

(2) adoption of the energy burdens recommended in the CAP Policy Statement (2020), when excluding CAP Plus payment and arrearage forgiveness co-payment (Proposed 2024-2028 Amended USECP at 10, 25);

(3) a \$25 minimum monthly CAP payment amount (2019 USECP at 24, Proposed 2024-2028 Amended USECP at 25);

(4) elimination of the provision in the CAP Policy Statement that a customer should direct the LIHEAP grant to the utility sponsoring the CAP be penalized for not applying for LIHEAP and that a LIHEAP grant should be applied to reduce the amount of CAP credits. Columbia reports this provision is already in place, but Columbia's CAP Customer Agreement Form still lists applying for LIHEAP and assigning the grant to Columbia as a program requirement (2019 USECP at 4, Proposed 2024-2028 Amended USECP at 5 and 50);

(5) adoption of the use of a standardized zero-income form and develop other industry-wide standardized forms (Proposed 2024-2028 Amended USECP at 31);

(6) use of the maximum recertification timeframes for CAP (Proposed 2024-2028 Amended USECP at 27);

³ *Columbia Gas of Pennsylvania, Inc. to Proposed 2024-2028 Universal Service and Energy Conservation Plan*, Docket No. M-2023-3039487, Supplemental Information (July 17, 2023) ("Supplemental Information").

(7) evaluation of household CAP bills at least quarterly to determine whether the customer's CAP credit amount or billing method is appropriate. Columbia reports that this provision is already in place (February 2022 Letter at 2, Proposed 2024-2028 Amended USECP at 25);

(8) a Community Education and Outreach Plan (CEOP) that describes Columbia's universal service education and outreach initiatives (Proposed 2024-2028 Amended USECP at 52-60);

(9) Updates to payment plan options (Proposed 2024-2028 Amended USECP at 10, 25);

(10) modification of the identity verification requirements to apply only to the applicant/ratepayer (Proposed 2024-2028 Amended USECP at 10, 24);

(11) elimination of the process of aggregate shopping for natural gas supplied to all CAP customers, due to lack of interest by natural gas suppliers. (Proposed 2024-2028 Amended USECP at 11);

(12) elimination of the Remedial Energy Efficiency Program (Proposed 2024-2028 Amended USECP at 11);

(13) increase to the maximum allowance for Health & Safety spending from \$650 to \$1,200 due to higher costs of materials and labor (Proposed 2024-2028 Amended USECP at 11, 20);

(14) elimination of the Inoperable Heating Systems Pilot due to lack of use. (Proposed 2024-2028 Amended USECP at 11);

(15) change to hardship fund eligibility rules to allow CAP Customers to receive a Hardship Fund grant beginning mid-May if funding is available. (Proposed 2024-2028 Amended USECP at 23);

(16) elimination of the requirement for social security numbers, driver's license number or other state identification number for all adults in the household including a requirement that the ratepayer must provide a social security number, driver's license number or other state identification number in order to verify identity for CAP enrollment (Proposed 2024-2028 Amended USECP at 10-11);

(17) quarterly review of all CAP accounts with automatic selection to lowest payment option available for which the customer is eligible (Proposed 2024-2028 Amended USECP at 11); and,

(18) requirement to provide energy efficiency tips and survey to be completed by all CAP customers with shortfall over \$1500 annually to determine reason for high usage The Company did not propose any major changes to the Customer Assistance and Referral Evaluation Services (CARES) program. *June 15, 2023 Order* at 15.

The OCA's Comments address the following issues raised by Columbia: (1) Proposed Changes to CAP Design; (2) Monitoring of USECP; (3) Co-Pay and CAP Plus; (4) Budget Billing and True-Up; (5) Income Verification; (6) Permissible Forms of Identification; (7) Consumer Education and Outreach Plan; (8) Pilot Programs; (9) IT Automation Costs; (10) LIURP; (11) Hardship Fund; (12) High Consumption; (13) Security Deposits; (14) Third-Party Credit Information; (15) CAP Agreement Form; and (16) Payment Troubled Requirement

II. COMMENTS

A. Energy Burden

In its Plan, Columbia asserts that it will adopt the maximum CAP energy burdens recommended in the CAP Policy Statement. Proposed 2024-2028 Amended USECP at 25. In its *June 15, 2023 Order*, the Commission stated that it could not calculate the cost of this change -- either in reduced bill burdens for low income customers or for other ratepayers -- because Columbia did not provide an estimate. *June 15, 2023 Order* at 19-20. Exclusive of the CAP-Plus and arrearage co-payment amounts, Columbia proposes to reduce the maximum energy burden from 7% to 4% for customers from 0-50% of the Federal Poverty Level (FPL) and 9% to 6% of the FPL for customers from 51-150% of the FPL. Columbia 2019-2021 USECP at 23.

In its *June 15, 2023 Order*, the Commission requested Supplemental Information regarding the following:

1. Projected average monthly CAP bills from 2024-2028, broken down by FPIG tier, based on both Columbia's existing and proposed CAP payment options.
2. Projected cost impact of the proposed CAP payment changes. Columbia shall provide an estimate of how the proposed CAP payment changes may impact CAP expenditures in 2024-2028, as compared to the existing CAP payment options. The cost projections must be broken down by cost component (*i.e.*, administration, CAP credits, PPA forgiveness, CAP Plus, and PPA co-payment), and FPIG tier (*i.e.*, 0%-50%, 51%-100%, and 101%-150%).
3. Projected impact on annual collection costs, as defined in 52 Pa. Code § 62.5(1)(ii), from 2024-2028 based on implementation of the proposed CAP payment changes, broken down by FPIG tier.

June 15, 2023 Order at 20.

1. Costs for CAP Customers

In response, Columbia provided only limited projections and information about the bill impact for CAP customers as result of the reduction in energy burdens. Specifically, it stated that

the average May 2023 monthly CAP bills, broken down by FPL tier and including the current CAP Plus of \$10.00,⁴ are as follows under each approach:

	0-50%	51-100%	>100%
% of Income	\$60	\$77	\$132
Average of Payments	\$55	\$55	\$62
% of Bill	\$69	\$75	\$83
Minimum Payment	\$35	-	-

Supplemental Information at 2.

Columbia then estimated for 2024, based on the proposed CAP payment options in Columbia’s Proposed 2024-2028 Plan and the current customer projected budget, the following would be the average CAP bill by FPL with the proposed revised energy burdens. *Id.* The current CAP Plus of \$10.00 is included in these amounts:

	0-50%	51-100%	>100%
% of Income	\$50	\$81	\$113
% of Bill	\$70	\$92	\$105
Minimum Payment	\$35	\$-	\$-

Id. Columbia elected not to provide projections about the cost of CAP bills beyond 2024. *Id.* It is not clear why Columbia did not project percentage of income payments for households as that would not be dependent on CAP costs, but it articulated that it could not project these costs because of the “volatility of gas prices.” *Id.* Columbia does not explain why it projects that the percentage of income payment for households with income from 51-100% of poverty would increase by approximately \$4 per month under the revised plan despite a proposed reduction in the energy

⁴ The OCA addresses CAP-Plus in section B, below.

burden from 7% or 9% to 6% for these households.⁵The OCA submits that Columbia should be required to explain why its projected percentage of income bill for customers at 51-100% of poverty is projected to increase under the proposed plan that reduces energy burdens.

2. Costs of CAP for Other Customers

In its 2024-2028 USECP, Columbia projects an annual increase to the total CAP costs from \$31,069,394 in 2024 to \$36,940,092 in 2028, or an increase of \$5,870,698. Proposed 2024-2028 Amended USECP at 16. The Company’s USECP projected enrollment estimates an increase in CAP enrollment from 25,725 participants in 2024 to 31,000 customers in 2028:

	2024	2025	2026	2027	2028
LIURP	455	455	425	425	425
CARES	400	400	400	400	400
CAP	25,725	27,011	28,362	29,780	31,000
Hardship Funds	1,300	800	800	800	800

Proposed 2024-2028 Amended USECP at 36.

In its Supplemental Information, Columbia also estimated the current CAP expenditures as compared to the CAP expenditures in the 2024-2028 Plan with the proposed changes to the energy

⁵ The Commission’s June 15, 2023 order is inconsistent with Columbia’s proposed plan. In the order, the Commission states that Columbia proposes to reduce its CAP PIP burdens from 7% to 4% for households with income from 0-110% FPL and from 9% to 6% for households with income from 110%-150% FPL. *See June 15, 2023 Order* at 17, Table 1. In its Amended USECP for 2024-2028, Columbia proposes a PIP of 4% for household with income from 0-50% FPL and of 6% for households with income from 51-150% FPL. *See Proposed 2024-2028 Amended USECP* at 25.

burdens. Supplemental Information at 3.⁶ The Company provides that the annual shortfall under the Current USECP structure will be:

	0-50%	51-100	>100	Totals
% Of Income	\$3,693,744.00	\$3,047,616.00	\$147,000.00	\$6,888,360
Avg of Payments	\$1,065,600.00	\$2,936,736.00	\$1,851,600.00	\$5,853,936
% of Bill	\$752,328.00	\$3,694,020.00	\$3,141,360.00	\$7,587,708
Minimum Payment	\$4,943,160.00	\$-	\$-	\$4,943,160
Totals	\$10,454,832.00	\$9,678,372.00	\$5,139,960.00	\$25,273,164.00

Supplemental Information at 3.

Columbia projects that the annual shortfall for the 2024-2028 Plan, including the revised energy burdens will be:

Proposed	0-50%	51-100	>100	Totals
% Of Income	\$4,179,708.00	\$9,091,764.00	\$2,572,752.00	\$15,844,224
% of Bill	\$230,400.00	\$531,828.00	\$962,808.00	\$1,725,036
Minimum Payment	\$6,773,040.00	--	--	\$6,773,040
Totals	\$11,183,148.00	\$9,623,592.00	\$3,535,560.00	\$24,243,300.00

Supplemental Information at 3. Columbia’s total CAP shortfall amount is projected to decrease by \$1,029,864 as shown in these charts.

The Commission also requested information about the projected impact on annual collection costs, as defined in 52 Pa. Code § 62.5(1)(ii), from 2024-2028 based on the

⁶ Columbia notes that “[d]ue to the recent volatility of gas prices, the Company is unable to predict future average CAP bills with any certainty, and therefore, the Company is also unable to predict with any certainty future CAP credit forgiveness levels.” Supplemental Information at 3.

implementation of the proposed CAP payment changes. Cite. In Supplemental Information, the Company responded that:

[t]here may be an impact to annual collection costs resulting from changes to the asked-to-pay amount for CAP customers. Per the plan changes, some customer's [sic] asked-to-pay amount will increase, and some will increase. Columbia's CAP non-payment default rate over recent years is as follows:

Year	%
2023	1.30%
2022	3.83%
2021	3.80%
2020	0.00%
2019	4.52%
2018	4.18%

These non-payment rates span relatively evenly across all FPIG levels, payment plan types and levels of CAP asked-to-pay amounts. Columbia submits that these low default rates support the promise that the Company's existing CAP plans are affordable to most CAP customers. The impact of further reducing some CAP bills, as is proposed in the USECP per the Commission's CAP Policy Statement 2020), may not result in fewer customers defaulting on their CAP bills. Therefore, it cannot be assumed that reducing already affordable payment plans will improve CAP payment behavior. Further, to the extent that there is concern about whether non-payment rates may increase for customers whose asked-to-pay amounts will increase, not that the customers could obtain further assistance with their Columbia bills by obtaining a LIHEAP grant.

There will, however, be programming costs associated with implementing the proposed CAP plan and payment changes, which are estimated to be \$42,000.

Supplemental Information at 4.

Based on the information provided by Columbia, the OCA supports the transition to the proposed energy burdens as proposed by Columbia. However, the OCA submits that prior to approval, Columbia should be required to explain why its proposed PIP amounts for households

with income from 51%-100% are projected to increase by approximately \$4 per month despite a decrease in the percentage of income charged to these households. In addition, in its USECP, Columbia asserts that Columbia's plans are "designed to be the most affordable (lowest) payment plan offered by Columbia." Proposed 2024-2028 Amended USECP at 25. The OCA supports this approach and supports Columbia's commitment contained in its USECP that beginning in December 2023 that it "will review all CAP accounts quarterly and will automatically enter the customer on the lowest option available." *Id.* This is an appropriate practice. The proposed changes to the energy burdens appear to decrease the average CAP bill for most of the customer groups, in particular for the customers from 0-50% of the Federal Poverty Level, while at the same time have no discernable impact on the cost of the shortfall. The OCA notes that as discussed below, the OCA recommends the elimination of the CAP Plus and the \$5 co-pay to further improve affordability for CAP customers. The OCA does not recommend that any cost mitigation or cost control measures should be implemented at this time. As discussed in Section B below, the OCA, however, recommends that on-going monitoring of costs over the 5-year period of the plan ensure that cost projections remain accurate on a going-forward basis. In addition, the OCA reserves the right to raise the need for additional cost control measures and to re-examine the identified energy burdens in the Company's next Universal Service and Energy Conservation Plan proceeding.

B. Monitoring

On a going-forward basis, the OCA recommends that cost controls should be examined as the Commission reviews the costs for implementation of program changes. As Columbia acknowledges in its Supplemental Information, there are elements such as increased CAP enrollment and the impact of the recent volatility in natural gas prices that could cause CAP costs to increase. *See Supplemental Information at 3.* While neither of these necessarily requires cost

containment as they are either desirable (increased enrollment to meet the needs of confirmed low-income customers) or outside the control of Columbia (increased natural gas prices), it is nevertheless appropriate for Columbia to continue to monitor program costs.

Specifically, Columbia should continue to monitor the total USECP costs of the program and the total/aggregate maximum CAP credits throughout the duration of the Company's plan. The OCA recommends that Columbia should be required to monitor the impact of the revised energy burdens on the *actual CAP program costs* and provide information to the parties about the actual cost information if the actual annual total USECP costs exceed the original budget by greater than 20%. If this criterion is met, Columbia should provide the actual cost information to all parties in this proceeding and schedule a meeting with interested stakeholders within 30 days of providing the data to receive input on the need for cost controls. Any party would be able to petition the Commission before or after those meetings to address cost control concerns or to raise or oppose cost control measures in any subsequent USECP or base rate proceeding. Columbia should propose going forward cost control measures if the total USECP costs exceed budgeted amounts by 20% or more, or justify why, despite this increase, no cost control measures are needed. This circuit breaker mechanism would allow for ongoing monitoring of costs, so they do not get too far afield from what Columbia are projecting. This is an important safeguard given the changes that Columbia are proposing here, the length of the USECP, and the currently ongoing volatility of the natural gas markets.

The OCA notes that, in his Statement in response to the most recent Peoples Natural Gas Company and Peoples Gas Company USECP, Commissioner Coleman cited favorably to a similar cost tracking mechanism for CAP costs:

[t]he proposed Order before us today directs the Peoples Companies to track data related to these CAP payment changes for review during their next USECP. I agree

with the proposed Order, but I also encourage the Peoples Companies to take more immediate action if CAP costs increase beyond the projected budgets. The Commission recently approved a Joint Petition for Settlement in Duquesne Light Company's 2020-2025 USECP which contained a provision whereby Duquesne Light Company will notify the parties to their proceeding and seek their input if USECP costs will exceed the projected budget by 10% and file a petition with the Commission explaining the cost increase and outlining possible programmatic cost-containment measures.

I believe similar provisions should be considered for inclusion in all USECPs. The Peoples Companies' Proposed 2019 USECP will be in effect for at least five years after it is approved. The Peoples Companies' next proposed USECP is not due until April 1, 2028, for the five years starting January 1, 2029. The Commission should not wait until five years, or more, have passed to address any disproportionate cost impact to the residential customers who are paying for the Peoples Companies' CAPs. To that end, I encourage the Peoples Companies to notify the parties to this proceeding and seek their input if CAP costs will exceed the annual projected budget by 10% and to file a petition with the Commission explaining the cost increase and outlining possible cost-containment measures.

Peoples Natural Gas Company LLC and Peoples Gas Company LLC 2019-2024 Universal Service and Energy Conservation Plan Submitted in Compliance with 52 Pa. Code § 62.4, Docket Nos. M-2018-3003177, et al., Statement of Commissioner John Coleman (May 12, 2022). The factual circumstances of the instant case differ from Peoples' USECP. There the threshold was a 10% increase in total USECP costs. Here, the OCA is proposing a trigger of 20% increase for total USECP costs. However, the concept and the objective are the same. The total USECP costs should be monitored and evaluated, and the parties should not wait five years to evaluate significant changes to the costs if they increase at rates significantly in excess of what has been projected.

C. Co-Pay and CAP Plus

Columbia's Proposed 2024-2028 Amended USECP includes a continuation of the Company's CAP Plus charge and the \$ 5 pre-program arrearage (PPA) co-pay. Proposed 2024-2028 Amended USECP at 25, 27, 29, 32, 50. As the Commission explained in its *June 15, 2023 Order*, the CAP Plus is described as:

a monthly charge assessed to every CAP customer. CAP Plus is calculated by dividing the total LIHEAP dollars received on CAP accounts in the previous heating season by the number of current CAP customers. A customer's monthly CAP Plus charge is 1/12 of this total. Proposed 2024 USECP at 24. Columbia recalculates the CAP Plus charge annually, beginning with the November billing cycle. In 2018, the monthly CAP Plus amount was \$3; in 2019-2020, it was \$2; for 2021, it was \$3, and for 2022, it was \$10. Proposed 2024 USECP at 26.

June 15, 2023 Order at 18. As Columbia notes in its Supplemental Information, the CAP Plus has ranged from \$2.00 to \$18.00, and the current CAP Plus is \$10. Supplemental Information at 5.⁷

The Commission noted that while Columbia proposes to revise its PIP maximum energy burdens consistent with the Commission's CAP Policy Statement (2020), Columbia does not explain how it will ensure that total CAP bills, with CAP Plus and \$5 PPA co-payment charges included, do not exceed the PIP energy burden. *June 15, 2023 Order* at 20. The Commission has recommended that a public utility design its CAP payment plan(s) so that a CAP customer's total CAP bill, including any add-ons such as PPA co-payments or CAP Plus charges, will not exceed the recommended maximum energy burdens. *June 15, 2023 Order* at 20-21 citing *November 2019 Order* at 31. In its *June 15, 2023 Order*, the Commission directed Columbia to identify what safeguards or processes will be in place to ensure that CAP customers' monthly bills will not exceed Columbia's PIP energy burdens as may be approved in this proceeding. *June 15, 2023 Order* at 21.

In response, Columbia submitted that:

[D]ue to the annual change to the CAP Plus, there may be times where CAP customers' bills exceed the applicable energy burdens set forth in the USECP. It is important to note that a minimum LIHEAP grant is more than the current annual CAP Plus and co-pays combined. Further, the Commission's CAP Policy Statement (2020) is guidance, not law. In order to assure that customers' PIP payments, including the co-pay and CAP Plus, never exceed the energy burdens in the CAP Policy Statement (2020), the Company would have to account for the variable co-

⁷ In its Supplemental Information, the Company provides that the CAP Plus was initially implemented in 2010 after a Department of Human Services (DHS) policy change that required LIHEAP grants to be applied to the CAP asked-to-pay amount rather than the CAP shortfall. Supplemental Information at 5.

pay and CAP Plus required and assign a lower than designed payment plan at least once a year when a new CAP Plus is calculated and also when all co-pays have been paid. Since asked-to-pay amounts could only decrease in this scenario, the CAP shortfall would increase.

Supplemental Information at 5.

The OCA does not support the additional fees proposed by Columbia and requests that the Commission require Columbia to eliminate both CAP-Plus and its \$5 PPA co-payment. Both fees are regressive, are inconsistent with the energy burden targets proposed in the CAP Policy Statement and should be eliminated. In response to questions about its current practice, Columbia indicated that it would be costly and confusing to program its system to account for the variability of CAP Plus and the co-payment to always keep them lower than the energy burdens suggested by the CAP Policy Statement. Supplemental Information at 5. The OCA submits that this is unnecessary as Columbia can simply stop charging these amounts and no additional programming would be necessary to calculate energy burdens.

To the best of the OCA's knowledge, Columbia is the only utility remaining with either a CAP Plus or a PPA fee. In addition, Columbia asserts that the minimum LIHEAP grant more than covers the current CAP Plus and co-pays. *Id.* The OCA does not think this fact is relevant or material. While other cost control measures to contain the cost of the CAP program can be considered, if necessary consistent with the OCA's recommendation above, the use and projection of LIHEAP grants and LIHEAP receipts to determine the amount that a CAP customer should pay in CAP should no longer be permitted by the Commission.⁸ The Commission should require Columbia to eliminate CAP-Plus and the \$5 PPA co-pay from its plan.

⁸ The OCA recognizes the long and complex history of CAP Plus, including its own involvement in creating and supporting the paradigm; however, the OCA no longer supports CAP Plus as an appropriate cost-control mechanism. The OCA continues to support appropriate cost control mechanisms where needed, but CAP Plus is an inappropriate means of assessing costs onto CAP customers that acts in a regressive manner, is inconsistent with a tiered percentage of income-based program designed to achieve affordability at certain targeted levels, and inappropriately considers a federal benefit as available in assessing what a CAP customer can pay each month.

D. Requiring Customers to Apply for LIHEAP

The Commission identified a discrepancy between Columbia's stated Plan and its practice regarding LIHEAP. *June 15, 2023 Order* at 22-23. The Commission noted that, in the Proposed 2024-2028 Amended USECP, Columbia states that it added language to its 2019 USECP specifying that customers do not have to apply for LIHEAP as a condition of CAP eligibility. *Id.* at 22. The CAP Customer Agreement Form, however, lists applying for LIHEAP and assigning the grant to Columbia as a CAP requirement. This practice is inconsistent with Columbia's statements in its Plan, which states that a program requirement for CAP participation is to apply for LIHEAP each year and to assign the grant to Columbia. *Id.* at 22-23 citing Proposed 2024-2028 Amended USECP at 5, 49. The Commission's *June 15, 2023 Order* provided:

[I]n its response to this Order, Columbia is directed to clarify if it requires CAP customers to apply for LIHEAP annually and to assign the grant to Columbia. To the extent that an amendment is required to the CAP Customer Agreement Form, Columbia is directed to submit a revised form.

June 15, 2023 Order at 23.

In its Supplemental Information, Columbia stated:

In its USECP proceeding for the period 2019-2021 at Docket No. M-2018-2645401, the Company proposed to remove the requirement that CAP customers apply for LIHEAP because the Company had not enforced the policy. In its Final Order dated August 8, 2019, at Docket No. M- 2018-2645401, the Commission stated its concern that removing the LIHEAP application requirement from CAP eligibility may decrease LIHEAP participation by Columbia's CAP customers and that low-income customers should be encouraged to apply for LIHEAP at every opportunity. The Commission, therefore, rejected Columbia's proposal to amend its CAP Customer Agreement Form to eliminate the requirement that customers apply for LIHEAP.

The Company currently complies with the Commission's aforementioned Order but does not enforce the requirement that CAP customers apply for LIHEAP. Please see Attachment A, which is Columbia's CAP Customer Agreement Form with the LIHEAP requirement removed.

Supplemental Information at 7-8.

While the OCA shares Columbia's goal of trying to ensure that all CAP customers apply for LIHEAP, the OCA does not believe that Columbia should present misleading and incorrect information in its Plan. A CAP participant should be encouraged to apply for LIHEAP. However, they may decide that it is better for their grant to be provided to their electric bill rather than their gas bill. A customer should not be penalized for choosing to apply the LIHEAP to the electric vendor. The fact that Columbia does not enforce this provision does not save it as there is no basis in the law or the Commission's regulations to include a provision that Columbia acknowledges it will never enforce. The Commission should require Columbia to remove the language from its application that is inconsistent with its Plan. Customers should not be told that it is a requirement to apply for LIHEAP when it is not and there is no legitimate basis for this language to remain in Columbia's application.

E. Income Verification and LIHEAP

Columbia's Proposed 2024-2028 Amended USECP states that Columbia does not count wages for household members under the age of 19. Proposed 2024-2028 Amended USECP at 24. In its Supplemental Response, the Company says that "it is agreeable to using the exact definition as written in 66 PA C.S. § 1403, as the Company recognizes the intent of the language to exclude *earned* income of a minor as household income." Supplemental Information, Clarification 7, page 8 (emphasis added). The Company does not state why it believes that its interpretation of the intent of the definition of "household income" as defined by the statute is correct despite the fact that it is inconsistent with the statute's plain language. As pointed out by the Commission, Columbia's position is not consistent with the Chapter 14 definition of household income, as it does not appear to count earned income for adult household members who are age 18 and does not appear to exclude unearned income for minors. *June 15, 2023 Order* at 24.

The Public Utility Code defines “household income” as “[t]he combined gross income of all adults in a residential household who benefit from the public utility service.” Columbia’s decision to *exclude* from the definition of household income, the income of 18-year-olds is inconsistent with this definition as individuals who are 18 years old are legal adults. Additionally, Columbia’s decision to *include* in this definition the unearned income in the name of individuals under age 18 is inappropriate as these individuals are not adults and the inclusion of income in the name of a minor cannot reasonably be read to be included in the scope the Chapter 14 definition.

The Commission clarified its position on this issue in the *Final CAP Policy Statement Order* which provides:

[a]dopting the Chapter 14 definition will provide a single definition to be used by both the Commission and the energy utilities and should facilitate greater consistency among the utilities in determining and documenting household income. This should work towards eliminating disparate parameters of CAP qualifications among EDCs and NGDCs with the goal of fostering more uniformity in program implementation.

Final CAP Policy Statement Order at 79. As such, the Commission noted that Section 1403 is used to establish Commission payment arrangements and that the same definition should be used to calculate CAP household income. *June 15, 2023 Order* at 23.

The Commission directed Columbia to clarify how it will calculate household income for CAP. Specifically, whether it will count all earned and unearned income for all adult household members (i.e., age 18 and over) and whether it will exclude the earned and unearned income for minors (i.e., under age 18). *June 15, 2023 Order* at 24. If Columbia is proposing to change how it defines or calculates “household income,” it should identify the intended effective date of that change. *June 15, 2023 Order* at 24.

In response to the Commission, the Company, stated that it believes “the recent interpretation that child support and social security benefits providing for basic life necessities and

provided in the name of an adult of the household should be excluded is not only a deviation from the original intent but also an obstacle in the Commission’s endeavor to streamline CAP enrollment and reverification process.” Supplemental Information at 8.

Additional clarity is needed on this point. The OCA recognizes, as Columbia points out, that there is an inconsistency in public benefit programs in terms of whether funds received for the overall wellbeing of a child such as Social Security disability benefits, survivor’s benefits, or child support are counted as income. Columbia submits that the meaning of “household income” for the determination of CAP eligibility and eligibility for other state programs should be the same as the meaning used by DHS in order to support meaningful coordination among LIHEAP and utility CAP programs. Supplemental Information at 9. Furthermore, it asserts that using the same interpretation will reduce confusion and frustration for customers. Supplemental Information at 9. The problem with this position, however, is the Section 1403 and, in light of the plain language of the Public Utility Code, the OCA does not agree with Columbia’s interpretation that would permit the inclusion of “unearned” income of minors even if other benefit programs with different statutory and regulatory requirements would allow this income to be counted. To be clear, to the best of the OCA’s knowledge, there is nothing about the character of the benefits received (legally or otherwise) that would prevent income of his sort to be considered as household income for purposes of program eligibility; rather, it is a statutory definition and Columbia’s resolution is inconsistent with the CAP Policy Statement and Chapter 14 and should be changed. No income from a minor – earned or unearned – should be included in household income for purpose of determining CAP eligibility. Section 1403 of the Public Utility Code specifically includes *only* gross income from adults and, thus, excludes income from minors in its entirety without exception. The OCA submits that the Commission should direct Columbia to comply with the requirements

of Chapter 14 and to exclude all minor income, earned or unearned, in its calculation of household income for purposes of CRP eligibility.

The Commission addressed a similar issue raised by PGW's most recent Universal Service and Conservation Plan and required PGW to eliminate unearned minor income from its calculation of household income. The Commission provided in its Order to PGW:

[w]e find that PGW's definition of household income to include unearned income of minors in the household is not consistent with the definition of household income in Section 1403 of the Public Utility Code, 66 Pa. C.S. § 1403. Further, while the statutory language is controlling, Section 69.262 of the CAP Policy Statement (2020) provides additional guidance that the unearned income of minors should be excluded from the household income calculation, 52 Pa. Code § 69.262. Accordingly, PGW is directed to exclude unearned income for minors when determining household income for CRP eligibility and to include this clarification in its Revised 2023 USECP. PGW is directed to implement this change within six months from the date of this Order.

Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027 Submitted in Compliance with 52 Pa. Code § 62.4, Order at 34 (January 12, 2023).

The OCA also submits that the Commission should reject Columbia's exclusion of household income of 18-year-olds. Columbia has chosen to interpret the definition of adult to begin at age 19 based on its determination that "many 18-year-olds are still in high school." Supplemental Information at 8. While the OCA understands and appreciates Columbia's intent in this regard, this definition is also inconsistent with Section 1403 which uses the term "adult" and should reasonably be construed to apply to any individuals age 18 or older who reside in the home whether those individuals are students or not. Thus, Columbia should be required to amend its USECP so as to include the earned and unearned income of all adults (i.e. those age 18 and above) living in the household for purposes of CAP income eligibility and should be required to *exclude* income from minors (i.e. those 17 and younger) regardless of whether that income is earned or unearned.

F. Security Deposits

Both the Public Utility Code and Commission regulations prohibit requiring a cash deposit for utility service from customers who are confirmed to be eligible for a CAP. *See* 66 Pa. C.S. § 1404(a.1)⁹ and 52 Pa. Code § 56.32(e). The Commission has clarified that for these purposes, the “confirmed to be eligible” term in Section 1404(a.1) means confirmed to be *income eligible* (i.e., have countable household income that is at or below 150% of the applicable Federal Poverty Level). 66 Pa. C.S. § 1404(a.1). The Commission's regulations on this point make this clear. In Section 56.32(e), the Commission has stated that “a public utility may not require a cash deposit from an applicant *who is, based upon household income, confirmed to be eligible for a customer assistance program*. An applicant is confirmed to be eligible for a customer assistance program by the public utility *if the applicant provides income documents or other information attesting to his or her eligibility for state benefits based on household income eligibility requirements that are consistent with those of the public utility’s customer assistance programs.*” 52 Pa. Code § 56.32(e) (emphasis added).

Columbia’s USECP should be clarified to be consistent with this approach. First, Columbia’s USECP states only that “CAP customers are not charged security deposits.” Proposed 2024-2028 Amended USECP at 30. Columbia’s tariff, however, states that “Confirmed low income customers and applicants will not be charged a security deposit.” *See* Columbia Gas of Pa, Supplement No. 334 to Tariff Gas – Pa. P.U.C. No. 9, Eleventh Revised Page 140. These statements are not inconsistent because CAP customers by definition are confirmed low income customers, but they are not the entire universe of confirmed low income customers. Many customers are

⁹ 66 Pa.C.S. § 1404(a.1) provides that “no public utility may require a customer or applicant that is confirmed to be eligible for a customer assistance program to provide a cash deposit.”

confirmed to be low income but not in CAP. Consistent with the Commission’s regulations and Columbia’s tariff these customers should not be charged a security deposit. It is unclear what Columbia’s current practice on this issue is, however, because in its Supplemental Information, it states that “Section 56.32(e) prohibits a utility from requiring a cash deposit from an applicant who is confirmed to be eligible for a utility’s customer assistance program based on household income *and any other applicable utility-specific program criteria.*” Supplemental Information at 6 (emphasis added). This statement is incorrect.

The Commission’s regulations do not allow a utility to consider other applicable utility-specific criteria. It is unclear whether Columbia is requiring documentation other than income eligibility for purposes of security deposit waiver. To do so would be inconsistent with both its tariff and the Commission’s regulations. Columbia should be required to clarify its practices concerning this matter in light of the Supplemental Information and, to the extent that it is requiring more than income verification for security deposit waiver should be ordered to conform its practices to the Commission’s regulations and Columbia’s tariff.

In its Supplemental Information, Columbia also explained that if a security deposit has been assessed and a household then is enrolled in CAP it deducts any outstanding balance from the security deposit and only refunds the difference. Supplemental Information at 7. Columbia asserts that this process “complies with Section 56.53 when read in its entirety.” *Id.* The OCA disagrees with this procedure as it is inconsistent with the Commission’s regulations on the return of security deposits. Commission regulations make it plain that a public utility must “refund a deposit, along with any applicable interest, within 60 days upon determining that the customer or applicant from whom a deposit was collected is not subject to a deposit [...]” See 52 Pa. Code § 56.53(f). Columbia should refund the full amount of the security deposit on CAP accounts that had

previously been assessed. If Columbia, applies the refund to a balance of arrears that would otherwise be forgiven through the program, a customer should be provided with the informed choice to receive a refund of the security deposit or to allocate it towards the back balance.

Columbia's current practice of refunding the security deposit is not a waiver or refund of the deposits consistent with the Public Utility Code or the Commission's regulations. 66 Pa. C.S. § 1404(a)(1); 52 Pa. Code § 56.32(e). Instead, it may merely be redirecting the deposit to be applied against the customer's account to reduce the arrears that would otherwise be subject to forgiveness. Columbia should clarify its policy, and if it is applied to any arrears, the Commission should direct Columbia to provide customers with an affirmative choice of whether to receive a refund of the security deposit or to apply the amount to the customer's balance that would otherwise be subject to forgiveness with future, ongoing monthly payments.

G. Permissible Forms of Identification

In its Plan, Columbia stated that it will accept an SSN, driver's license number, or another state identification number for the ratepayer applying for CAP. Proposed 2024-2028 USECP at 24. The Commission noted that, based on Columbia's description, it would appear Columbia only verifies the identity of the customer/ratepayer who applies for CAP, not each individual member of the household. *June 15, 2023 Order* at 25. According to the Commission, the CAP Policy Statement (2020) recommends public utilities verify the identities of CAP applicants and household members and accept alternative identification in lieu of requiring SSNs. 52 Pa. Code 69.265(8)(ii)(A). The Commission further noted that if Columbia is proposing to waive verification of the identities of household members, it should explain how it will otherwise verify that the household composition information listed on a CAP application is accurate. *June 15, 2023 Order* at 25. Further, the Commission noted that Columbia does not specify what alternative state

identification it will accept or if there are circumstances for which it would accept a passport, Visa, or other forms of non-state identification. *June 15, 2023 Order* at 25. As such, the Commission directed Columbia to clarify: (1) if only the customer/ratepayer or all household members must provide verification of identity when applying for CAP and, if so, how it will verify the ratepayer's reported household composition; (2) what forms of state identification numbers, beyond a driver's license, it will accept as proof of identity; and (3) what other forms of non-state identification it will accept, if any. *June 15, 2023 Order* at 25.

In response, the Company stated that it will require proof of identity for the ratepayer only. The Company will request names and ages of all occupants and accept verbal confirmation thereof. Supplemental Information at 11. The Company will accept a state-issued driver's license or non-driver's ID card for the ratepayer. In addition, the Company will also accept passports, temporary Social Security cards and alien ID numbers provided by a state refugee and immigration agency for the ratepayer. Supplemental Information at 11.

The OCA notes that requiring a customer to provide either a Social Security Number or some other state identification number as identity verification for CAP is inconsistent with page 10 of Columbia's Proposed 2024-2028 Amended USECP as Columbia states that they will "Eliminate" the requirement for a social security number for some other state identification number. However, on page 24 of Columbia's proposed USECP under the last bullet of "Eligibility Criteria", Columbia states that either a Social Security number, driver's license number or another state identification number for the rate payer must be provided. Additional clarification should be provided.

The OCA supports Columbia's position that it will only require identification and income verification from the applicant for the household.

H. Consumer Education and Outreach Plan (CEOP)

1. Introduction

Columbia's Proposed 2024-2028 Amended USECP included information about Columbia's planned communications, outreach, and promotion of energy assistance program enrollment to its CAP applicants. Proposed 2024-2028 Amended USECP at 52-60. As the *June 15, 2023 Order* provides:

Columbia's external outreach includes participation at community events, posting information on its website, holding universal service advisory committee meetings, issuing press releases, training agencies, and making customer referrals. Columbia's internal outreach to promote its programs include call aid scripting, staff trainings and meetings, company distributed articles, and contests to encourage program referrals. Proposed 2024 USECP at 52-60.

June 15, 2023 Order at 31-32. Columbia's outreach efforts also include a Low Income Usage Reduction Program (LIURP) welcome packet and a CAP Agreement Form; having Care Center representatives explain available programs to customers; and providing assistance with applying for programs through the CARES program. *Id.* at 32. The Company also offers targeted outreach for Spanish speaking customers, survivors of domestic violence, landlords, seniors, veterans, peoples with disabilities, and customers at or below 50% of the FPL. *June 15, 2023 Order* at 32: Proposed 2024-2028 Amended USECP at 58.

The Commission noted that it was unclear as to which of Columbia's CEOP initiatives currently exist and which are new proposals. Columbia was directed to provide the following information and clarifications:

Indicate which CEOP initiatives are new (*i.e.*, implemented in 2019 or later) and which initiatives represent existing practices to help its most vulnerable customers (*e.g.*, at or below 50% of the FPIG, LEP, impacted by COVID-19).

Explain how it educates customers on how to determine their own "household energy burden" to help encourage interest and participation in CAP and stimulate actions for energy conservation in the household.

Explain whether and how the components of its CEOP are provided to each community within its service territory.

Explain whether its targeted outreach to landlords is tracked and if it has resulted in increased participation of rental properties in LIURP.

Provide copies of its CAP brochures and customer bill inserts that outline the program guidelines and customer responsibilities.

Identify what languages Columbia provides for program applications, brochures, and consumer education materials. Also explain how Columbia determines what languages are needed for its service territories.

June 15, 2023 Order at 32-33.

The Company noted that its proposed CEOP is adjusted annually and is broad. Supplemental Information at 15-16. The Company provided a breakdown of activities targeting specific populations. Supplemental Information at 16. In its Supplemental Information, Columbia also provided a few details about its outreach methods or proposed trainings. As such, it will be essential that its Universal Services Advisory Committee remain involved in Columbia's CEOP to suggest any necessary additions or changes to its implementation. Columbia should provide updates to its Advisory Committee about its CEOP regularly in between USECP proceedings to solicit feedback and make ongoing improvements, rather than waiting for its next USECP to address issues.

The OCA submits that the outreach plan is an important component of the Commission's *Final CAP Policy Statement Order* and CAP Policy Statement. *Final CAP Policy Statement Order* at 79. The Commission has affirmed this specifically with Columbia's CEOP. As the Commission stated in a recent Columbia base rate proceeding Order, constant attention and development must be provided to these outreach programs:

Upon review, we agree with the recommendation of the ALJ that there is no need to change Columbia's outreach initiatives at this time.

However, we do want to reconfirm that [Columbia Gas of Pennsylvania, Inc. (Columbia)] is developing and implementing all reasonable strategies to both increase its customer outreach efforts and CAP participation levels in order to reduce arrearage levels as recommended in the [Columbia's] most recent Management Audit. We take notice of Columbia's statements in this matter that it has already put into practice all of the OCA's recommendations to increase outreach and expand CAP enrollment and commend [Columbia] for these efforts. But in acknowledging these efforts, consistent with the Management Audit recommendations, we expect [Columbia] to continue working with its USAC on its Outreach Strategy and Communication Plan going forward. These continuing efforts should include examining current outreach strategies for effectiveness and developing new outreach efforts to improve CAP participation levels even more, which, in turn, will likely reduce future arrearage levels. Further, [Columbia] needs to determine whether it has exhausted all grassroots community-based avenues to identify new low-income customers. For example, besides the community-based organizations Columbia already is working with, are there other local organizations it can partner with, such as food banks, schools, Head Start or other preschool programs to implement more fully its outreach strategies.

Pa. Pub. Util. Comm'n v. Columbia Gas of Pennsylvania, Inc., et al., Docket Nos. R-2020-3018835, et al., Order at 172-73 (Feb. 19, 2021) (*Columbia 2020 Order*).

In previous Columbia rate cases, OCA witness, Roger Colton, has recommended that utilities conduct certain outreach efforts to improve its participation rate, particularly with the 0-50% of the FPL population. For example, Mr. Colton testified in the *Columbia 2020 Order* base rate case that a utility should (1) use the community as a means of identifying such customers rather than rely on call center contacts; (2) focus on relationship-building; (3) go to where the customers, live, work, shop, play, and pray rather than rely on the customers initiating contacts; and (4) rely on grassroots "trusted messengers" from within the community. *Columbia 2020 Order* at 162-163. Mr. Colton, in that same testimony, recommended that outreach could be built into the Company's collections process by offering customers a chance to enroll in CAP when a confirmed

low-income customer seeks to enter into a payment arrangement, is about to be terminated for non-payment, is disconnected for non-payment, and/or is contacted by the Company and found to either be using a potentially unsafe heating source or is without service. *Id.* at 163. Such measures are important because improving participation in CAP can improve payment patterns for participating low-income customers and ensure that fewer are disconnected for non-payment. In other words, improving enrollment in CAP will help decrease utility expenses and improve revenues.

The OCA continues to support Columbia's attendance and funding of various outreach events. The OCA suggests that the Company implement permanent quarterly events hosted by Columbia and additional monthly events hosted by community partners with the assistance of Columbia to help target customers. OCA understands that Columbia would like to keep an open schedule to allow for flexibility but maintaining standing events with partners will allow for people to better plan for a day to come to an outreach event. This predictability could lead to increased attendance with each event.

In addition to the information requested by the Commission, the OCA requests that the Commission direct Columbia to provide information on whether Columbia complied with their plan, and if so, what lessons were learned. Moreover, the OCA requests further information as to metrics to evaluate the plan, whether there was an evaluation report, and how those analyses were incorporated into the Company's outreach efforts.

2. Outreach to Customers at 0-50% of the FPL

In the Commission's *Final CAP Policy Statement Order*, the Commission stated clearly that:

[w]hile utilities have flexibility as to the contents of their plans, the plans should reflect focused consumer education and outreach efforts, tailored to the demographics of their individual service territories, spanning the duration of the universal service plan period. In particular, these plans should identify

efforts to educate and enroll eligible and interested customers at or below 50% of the FPIG.

Final CAP Policy Statement Order at 79 (emphasis added). Section 69.265(8)(i) of the CAP Policy Statement recommends that a public utility develop and incorporate a CEOP as a part of its USECP. 52 Pa. Code § 69.265(8)(i). Thus, utilities should be under a continuing obligation to ensure that its customer outreach programs adequately identify and solicit those who may need help the most.

Although Columbia identifies that it offers targeted assistance to customers at or below 0-50% of the FPL, the Company's Plan does not specifically reference how it will address outreach to customers from 0-50% of the FPL. In the Settlement of the 2021 base rate case, Columbia agreed to:

[d]evelop an outreach campaign to promote existing customer assistance programs and all available resources. The campaign will include TV and social media ads, electronic and written materials, and a Targeted Outreach component providing services to customers with households incomes below 50% of poverty that have not received available assistance. The Targeted Outreach will be provided by a third-party contractor who will initiate contact with customers using Company lists of income eligible customers with high arrears as well as referrals from community members and Customer Service Representatives. The Targeted Outreach representative will work with existing resource administrators to make the customers aware of the available assistance and aid customers in enrolling/applying to these assistance programs, as necessary. The Company will recover the cost through the Rider USP not to exceed \$200,000 in 2022.

Pa. Pub. Util. Comm'n v. Columbia Gas of Pennsylvania, Inc., et al., Docket Nos. R-2021-3024296, et al., Settlement at ¶ 39 (Sept. 7, 2021) (*Columbia 2021 Settlement*). The Company reported on the results of its efforts to the Universal Services Advisory Committee. To the extent that Columbia is continuing to engage with targeting this population as a result of the *Columbia 2021 Settlement*, the CEOP should reflect what specific efforts that the Company is taking.

The OCA also recommends that Columbia should place a greater emphasis on geo-targeting areas with high penetrations of areas with customers at or below 50% of the FPL. Such efforts could include mailing, e-mailing, or engaging grassroots organizations to canvass door-to-

door. Broad outreach measures that include the 0-50% are not measures targeted to the 0-50% population.

3. Leverage Technology

The OCA also recommends that Columbia be directed to pursue prescribed types of technology to advance the identification of Confirmed Low-Income customers and their enrollment into CAP, as well as improving the retention of CAP customers by decreasing the extent to which Columbia lose CAP participants to defaults attributable to the failure to recertify.

Many of the problems facing energy companies today with respect to enrolling low-income customers in CAP and preventing them from being dropped due to a failure to recertify, are similar to the problems facing other health and human service programs. Examples include:

- Agencies that have a low completion rate for interviews at the time of the initial application and renewal. Underlying issues include clients who don't receive timely notice of the scheduled interview, are unable to complete the interview at the scheduled time, or are unable to reach agency staff to reschedule appointment.
- Clients that do not provide required verification documents with their application, and must then send them through the mail. Frequently, applications are thus denied because documents are never submitted or are lost. Underlying issues include clients who don't know what documents are required, clients who cannot electronically submit documents (or must have access to a scanner to do so), and agencies that have a backlog in processing mailed applications.
- Agencies that have a low rate of completion at renewable because clients fail to complete the renewal form properly or fail to submit the form, the result being that their benefits are terminated (and they must reapply to have benefits reinstated).

A recent publication by the Center on Budget and Policy Priorities (CBPP) identified technological tools that help to address these challenges. According to the CBPP publication:

Improving client-facing processes – systems that applicants and recipients use directly for actions like applying, submitting documents, or getting information about their case – allow clients to better obtain information and receive benefits more quickly. They also help agencies get the information they need to conduct eligibility determinations and improve performance and outcomes.

Improving Customer Service at 1.¹⁰ The publication “outlines common challenges agencies face while administering these benefits and gives examples of how the technologies profiled. . .can streamline processes.” CBPP notes that “the technologies discussed here are not theoretical; rather they are applicable to real-world issues clients and agencies face each day.” *Id.* It provides best practices in using web-based tools, mobile-based technology, and call center tools. *Id.*

The OCA recommends that Columbia take the following steps:

- Present the question of how to incorporate technology tools into the process of identifying Confirmed Low- high consumption customers; enrolling low-income customers in appropriate low-income programs (e.g., CRP, winter moratorium), and maintaining that enrollment at the time of recertification or reverification, to the Universal Service Advisory Committee with a report to the Bureau of Consumer Services with recommendations and
- Include, beginning with the Columbia Company’s next-filed USECP, a specific USECP section addressing the technology tools used to improve the process of identifying Confirmed Low-Income customers, enrolling low-income customers in appropriate low-income programs, and maintaining that enrollment at the time of recertification or reverification.

The OCA recommends that Columbia undertake a more concerted effort to incorporate technology to address the issues they face with respect to identifying its low-income customers, enrolling those low-income customers in PCAP, and maintaining that enrollment.

4. Language Offerings

Columbia’s Proposed 2024-2028 Amended USECP indicates that Columbia will make efforts to serve the Spanish speaking community by utilizing Spanish language materials. Proposed 2024-2028 Amended USECP at 12, 54. This includes targeted ads in certain geographic areas, offering written materials in Spanish, and information on its website in Spanish and offering the option of Spanish speaking customer and outreach reps to Spanish speaking customers (pg. 12 &

¹⁰ *Improving Customer Service in Health and Human Services through Technology*, Center on Budget and Policy Priorities, <https://www.cbpp.org/research/health/improving-customer-service-in-health-and-human-services-through-technology> (Aug. 22, 2018)(*Improving Customer Service*)

55). *Id.* The OCA supports Columbia's effort to increase its ability to communicate and educate its Spanish speaking customers and members of the community. The OCA suggests that Columbia begin offering these services in other languages throughout their territory.

The OCA also recommends that the Company explore offering materials in additional languages. The Commission's *June 15, 2023 Order* requested that the Company provide additional information regarding the languages that Columbia provides for program applications, brochures, and consumer education and how Columbia determines what languages are needed for its service territories. In the Supplemental Information, Columbia identifies that it uses the American Community Survey conducted by the US Census Bureau to determine what areas are needed for Limited English Proficiency (LEP). Supplemental Information at 19. Columbia identified that the predominant other language is Spanish, and that no other languages in the service territory counties met a threshold of more than 5%.

The OCA does not believe that the 5% threshold should be the only demarcation of when the Company should provide translated materials. Columbia has a customer base of approximately 440,000 customers in portions of 26 counties. Five percent of customers represents 22,000 customers. The OCA recommends that the Company consider amending the 5% standard to examine other languages in the service territories and whether there might be additional opportunities to translate its materials into other languages if a critical mass of customers is served in a particular community even if it does not meet the 5% threshold. The OCA recommends that the Commission direct the Company to discuss language access with its Universal Services Advisory Committee and whether there might be additional opportunities to expand language access. The OCA also recommends that the USAC address which materials are translated and whether the types of materials that are translated, including into Spanish, should be expanded.

5. Coordination with Water and Wastewater Utilities

Columbia's CEOP also does not discuss its efforts to coordinate with other utilities, in particular, water and wastewater utilities. The OCA recommends that Columbia should also incorporate into its Plan coordination with water and wastewater utility assistance programs in the service territory in order to improve enrollment in its CAP and to help to cross-market each of the respective low-income assistance programs. Several water and wastewater utilities in the service territory such as Pennsylvania-American Water Company have low-income programs to serve the same population of customers. Coordination of efforts will help to improve enrollment in each of the utilities' programs.

I. Pilot Programs

1. Health and Safety Pilot

Columbia proposed to continue its Health and Safety Pilot Program (H&S Pilot) which began in 2021. Proposed 2024-2024 Amended USECP at 20-21. The H&S Pilot is for CAP customers whose dwelling cannot be weatherized without first correcting existing health and safety issues. *Id.* The H&S Pilot's annual budget was increased from \$200,000 to \$400,000 beginning in 2022, with a maximum budget of \$600,000 per year if dwellings are available and in need of the services, in the *Columbia 2021 Settlement. Columbia 2021 Settlement* at ¶ 40. *June 15, 2023 Order* at 34. CAP credits. Proposed 2024-2028 Amended USECP at 6. In the Proposed 2024-2028 Amended USECP, Columbia proposes to set the H&S Pilot's annual budget at \$400,000 and estimates serving 30 dwellings per year. The Proposed 2024-2028 Amended USECP indicates that Columbia will measure the H&S Pilot's success and cost-effectiveness similarly to LIURP. Proposed 2024-2028 Amended USECP at 21-22.

The Commission directed Columbia to clarify if the H&S Pilot cost formula includes projected savings associated with reduced CAP credits. *June 15, 2023 Order* at 35. If so, Columbia was directed to provide those projections and how they are factored into the cost formula. *Id.* Columbia was also directed to clarify how it increased the eligible pool of customers for its H&S Pilot beginning in January 2022. *Id.* Further, Columbia is directed to identify how it measures success and cost-effectiveness for the H&S Pilot and provide results based on 2021 and 2022 data. *Id.*

The Company noted that the formula has been adjusted to project savings associated with reduced CAP credits. Supplemental Information at 23. The max spending calculation was adjusted by adding the anticipated reduction in CAP credits for the lifetime of the measures completed. Supplemental Information at 23. The Company has not had any customers use over 2,000 therms annually in three years. *Id.*

Columbia noted that the success of the Pilot will be measured similarly to LIURP by reviewing actual savings and comparing to the cost incurred. Supplemental Information at 24. Cost effectiveness will be measured by reviewing the original calculation and comparing to actual savings to determine if the job still meets the expected payback. *Id.*

The purpose of the pilot is identified in the Plan to reduce the number of deferrals due to conditions in the home such as knob and tube wiring, moisture in the basement due to leaky roofs and minor structural issues. In the Supplemental Information, Columbia identified that it does not limit what is or is not considered a health and safety measure for contractors, but any work that needs to be completed to make the heating system safe and operable is considered related to health and safety. Supplemental Information at 32.

The OCA supports the continuation of the Health and Safety Pilot at the existing funding levels. In Columbia's 2019 USECP order funding for the implementation of a Health and Safety pilot was established and eventually expanded from \$200,000 to a maximum of \$600,000. On page 20 of the Proposed 2024-2028 Amended USECP, Columbia proposes to extend the pilot program but cut the maximum budget from \$600,00 to \$400,000. In its Plan, Columbia did not provide a reason for the proposed budget reduction. The OCA seeks clarification behind the basis and reasons for the budget cut and recommends that absent a showing that the program is not needed at the higher level the budget remain the same. Also, if the Company wants to extend the pilot, the OCA requests that the Company provides their reasons as to why the program is being referred to as a "pilot." The program appears to have been successful and expanded the number of homes eligible for LIURP. The OCA submits that the Commission should consider making the pilot a permanent part of the program.

J. IT Automation Costs

Columbia's Proposed 2024-2028 Amended USECP states that they plan to automate their CAP customer quarterly review. IT costs related to the automation process will be recovered through Rider USP. Proposed 2024-2028 Amended USECP at 7. By July 30, 2023, the Company will file a progress report explaining its progress toward implementing the automated process. *Id.* The Company does not include any cost details in its Plan about how much the automation will cost. should provide greater detail regarding the proposed costs related to the automated plan. While the proposed automation may be beneficial, the OCA submits that the proposed costs for the automation should be identified so that the Commission has the opportunity to review those proposed costs and whether they are justified.

K. LIURP

1. LIURP Budget

The OCA has a concern with PGW's Low Income Usage Reduction Program (LIURP) budget and how the budget is established. In particular, the OCA is concerned that Columbia has not shown that its proposed LIURP budget is sufficient to meet the documented needs. Section 58.4(c) provides that revisions to a budget should be set utilizing the following factors:

c) Guidelines for revising program funding. A revision to a covered utility's program funding level is to be computed based upon factors listed in this section. These factors are the following:

- (1) The number of eligible customers that could be provided cost-effective usage reduction services. The calculation shall take into consideration the number of customer dwellings that have already received, or are not otherwise in need of, usage reduction services.
- (2) Expected customer participation rates for eligible customers. Expected participation rates shall be based on historical participation rates when customers have been solicited through approved personal contact methods.
- (3) The total expense of providing usage reduction services, including costs of program measures, conservation education expenses and prorated expenses for program administration.
- (4) A plan for providing program services within a reasonable period of time, with consideration given to the contractor capacity necessary for provision of services and the impact on utility rates.

52 Pa. Code § 58.4(c).

Columbia reports that 24,933 customers meet the LIURP eligibility criteria. Proposed 2024-2028 Amended USECP at 36. Of that total, Columbia identifies 13,531 as property owners and 11,402 as renters. Proposed 2024-2028 Amended USECP at 36. Columbia anticipates that only approximately half of eligible renters (5,701) would receive landlord approval for weatherization services. Proposed 2024-2028 Amended USECP at 36. The Commission noted that while the needs assessment identifies the number of current customers who meet LIURP eligibility, it does not identify a breakdown of the factors used to determine this number, relative to screening the pool

of confirmed low-income customers. *June 15, 2023 Order* at 48-49. It was also not clear what factors relevant to the LIURP needs assessment Columbia used to determine its proposed annual LIURP budget. LIURP regulations at subsections 58.4(c)(1)-(4) provide guidelines on the factors that should be considered when determining a LIURP budget. Order at 49. As such, Columbia was directed to provide the following:

The number of known customers with household income between 151% and 200% of the FPIG.

The number of income-eligible customers who have consumption greater than 170 therms.

The number of income- and usage-eligible customers who have not received LIURP within the past seven years.

Of those customers, the number who are ineligible for LIURP due to other reasons (e.g., deferred due to health and safety issues). Each issue and the number of customers it applies to should be identified individually.

Explain the congruence between the LIURP needs assessment and the determination of its proposed annual LIURP budget.

June 15, 2023 Order at 49-50.

The OCA notes that the LIURP budget is constant through 2025, and then decreases. As such, the OCA asserts that significant questions remain about whether Columbia's budget is sufficient to meet the demonstrated need.

Specifically, Columbia has not set forth a nexus between the LIURP budget, the needs analysis, and the number of units being served each year. The current LIURP budget is set forth without any direct tie to achieving an objective of addressing the current needs analysis and how that needs analysis may change from Plan to Plan or in the event of a rate increase or gas commodity cost increase. Moreover, unless the LIURP budget increases over time, due to increasing costs and inflation, the LIURP budget will be able to serve fewer customers at the end of the Plan than it could at the beginning of the Plan.

The OCA does not anticipate that this issue can be resolved through this Comment and Reply Comment period alone. However, what can be achieved through this Plan review is an acknowledgement of the disconnect between the proposed LIURP budget and how it meets the needs of the low-income population, and the need for a dynamic process to address the deficiencies in the current process. The OCA recommends that the Commission require Columbia to determine a budget appropriate to meet the needs in its service territory using the existing factors found at 52 Pa. Code § 58.4(c) and that budget be set as an initial budget that should be revisited by Columbia throughout the duration of its plan to account for increased needs and increased costs for Columbia to provide services and for consumers in terms of rates that should be mitigated through weatherization assistance. There should be a process developed for Columbia (and all gas and electric utilities) to provide information at least every two-years demonstrating that its LIURP budget is sufficient and that it accounts for changes that occur (including intervening rate increases). Stakeholders should be permitted to comment upon and propose adjustments to the LIURP budget during these interim filings that occur between-USECP filings. Waiting until 2028 or the interim between base rate proceedings is too long to allow the necessary between USECP approvals of increased LIURP budgets based on increased need or costs to serve households.

The OCA additionally seeks clarification as to what the congruence is between the needs assessment and the LIURP budget and how the information is the needs assessment applied to the LIURP budgets. The OCA is concerned in regard to low LIURP enrollments. According to the OCA's calculations, at the rate shown by Columbia, and given the estimate of 24,933 low-income customers who could receive weatherization through LIURP, it would take nearly 60 years to treat everyone ($24,0933 / 425 = 58.7$). The OCA submits that there should be a greater congruence between the needs assessment and the budget and the number of units treated each year.

2. LIURP Landlord Approval

Columbia states that renters must have property owner permission to receive LIURP. Proposed 2024-2028 Amended USECP at 19. Columbia specifically states that it has difficulty getting landlord approvals. *Id.* The Commission directed Columbia to clarify the method by which it receives property owner permission and provide a copy of the form used to verify permission. *June 15, 2023 Order* at 39. To the OCA's knowledge, Columbia did not provide a direct response. Instead, the Company explained how targeted outreach to landlords is tracked and whether it has resulted in increased participation of rental properties in LIURP. *June 15, 2023 Order* at 18.

The OCA supports initiatives that assist interested customers in obtaining their landlord's approval for LIURP projects. The OCA, however, seeks clarification as to what steps Columbia is taking to make it easier to obtain landlord approvals. Moreover, when Columbia has an issue obtaining landlord approval, what steps are taken to educate and to persuade the landlord to cooperate outside of the brochure Columbia provided. *See Proposed 2024-2028 Amended USECP* at 49. Additionally, the OCA seeks clarification on the assistance Columbia provides in the event that a tenant is interested in obtaining weatherization services but cannot persuade their landlord beyond the LIURP information pamphlet provided by the Company.

In its Supplemental Information, Columbia, in particular, discusses how the consent form is mailed or emailed and then must be returned either via US mail, faxed or scanned copies. Supplemental Information at 30. Columbia should implement additional options to facilitate customers' abilities to obtain landlord approval, such as approval by text or email and accepting e-signatures. Easier methods of communication from the landlord to Columbia may help to facilitate better response rates.

3. LIURP Cooperation with other Utilities

In addition to the above information, the OCA seeks information on whether or not Columbia attempts any coordination with other utilities when conducting weatherization and conservation measures. The OCA supports any cooperation between utilities to increase and maximize the benefits and efficiency of the service and program. Moreover, as discussed above, the OCA recommends that, as water affordability programs become more prevalent, there should be a cross-enrollment with the water programs as well as other energy programs. The OCA specifically endorses the cooperation between utilities and separate contractors with regards to LIURP projects. Cooperation and the sharing of waiting list would allow contractors to complete all jobs related to all utilities in on visit.

L. Hardship Fund

In the *June 15, 2023 Order*, the Commission identified concerns that Columbia's program administrator, Dollar Energy Fund, was establishing the criteria for the universal service program. *June 15, 2023 Order* at 46. The Commission cited to the example of the Duquesne Light Company 2017 USECP proceeding in which the Commission concluded that a deferring to Dollar Energy's policies when establishing the Hardship Fund requirements was inconsistent with the requirements of the public utility under the Electricity Generation Customer Choice and Competition Act. *June 15, 2023 Order* at 46. In the Duquesne Order, the Commission provided that:

Section 2804(9) of Title 66[35] encourages the use of CBOs "that have the necessary technical and administrative experience to be the *direct providers of services or programs*" (emphasis added). While contracted CBOs may be used to administer universal service programs, the utilities are responsible for setting eligibility requirements, establishing program parameters, and drafting a triennial USECP for Commission approval. A contracted CBO should not dictate the eligibility requirements of a utility's universal service program.

Duquesne Light Company 2017-2019 USECP Order, Docket No. M-2016-2534323, Order at 46 (March 23, 2017); *see also Peoples Natural Gas LLC and Peoples Gas LLC 2019-2024 USECP*, Docket Nos. M-2018-3003177, M-2020-3021343, Order at 70-75 (May 12, 2022); *Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company Joint 2019-2021 USECP Order*, Docket Nos. M-2017-2636969, M-2017-2636973, M-2017-2636976, and M-2017-2636978, Order at 41-43 (May 23, 2019).

The Commission requested that the Company provide a full description of its Hardship Fund eligibility criteria, including the specific payment and balance requirements, and its practices differ or expand on the criteria identified in the Proposed 2024-2028 Amended USECP. *June 15, 2023 Order* at 47; Proposed 2024-2028 Amended USECP at 22. In its Supplemental Information, Columbia identified several criteria for the Hardship Fund including the minimum arrearage balance and that a “sincere effort” has been demonstrated “as required by Dollar Energy Fund.” Supplemental Information at 36.

The OCA shares the Commission’s concerns for the reasons set forth in the Commission’s *June 15, 2023 Order*. The OCA submits that all of the eligibility guidelines need to be set by Columbia, and approved by the Commission. DEF is only the administrator of Columbia’s Hardship Fund, and the administration of the Hardship Funds should be guided in all respects by policy established by the Commission and implemented by the Company.

M. Third-Party Credit Information

In Columbia’s Proposed 2024-2028 Amended USECP, Columbia notes that “Columbia recently purchased data from a third-party credit company that estimated Columbia’s low-income population to be 57,686 at the zip code level.” Proposed 2024-2028 Amended USECP at 35. Columbia states that the purpose of the data was to assist with a calculation of potentially payment-

troubled low-income customers. Proposed 2024-2028 Amended USECP at 35. The Commission has a prescribed process for the calculation of the estimated number of low-income customers in the service territory. The consistency of that calculation allows the Commission to be able to assess the needs of the service territory and to compare the information across utilities.

The OCA is concerned regarding how Columbia might use this data and does not believe that this data should be relied upon exclusively or even primarily for purposes of calculation of the estimated low-income customer population or for any other purpose. The third-party data credit information has not been vetted for accuracy. The OCA recommends that the Commission either disregard the use of this information or require significantly more detail about how it dovetails with the Commission's prescribed methodology. In addition, the Commission should require Columbia to identify how the Company plans to use the purchased third-party credit information regarding the number of low-income customers in the service territory and how the cost of this purchased information will be recovered. To the extent that the data is used for any other purpose than counting the number of estimated, payment-troubled customers, the customers should be informed of the collection of that information, what the contents of the information stated, and be given the appropriate right to challenge the data.

N. The CAP Agreement Form

As part of Columbia's CAP Customer Agreement Form, participants are asked to agree to the following provision:

Agree to release Columbia Gas of Pennsylvania, Inc. and Dollar Energy Fund, Inc. from any liability while a participant in the CAP program. In addition, I authorize Columbia Gas of Pennsylvania, Inc., to publish, disseminate, reproduce, use and dispose of any data including account information furnished by or regarding eligible CAP customers in such a manner as Columbia deem appropriate.

Proposed 2024-2028 Amended USECP at 50.

In its *June 15, 2023 Order*, the Commission identified a concern with the breadth of the proposed language. *June 15, 2023 Order* at 29. The Commission has previously determined that these provisions are inconsistent with previous Commission directives relative to Columbia's 2015-2018 USECP (2015 USECP). *Columbia 2015-2018 USECP Final Order*, Docket No. M-2014-2424462, Order at 31 (July 8, 2015) (*2015 USECP Order*); *see also June 15, 2023 Order* at 29. In Columbia's 2015 USECP proceeding, the Commission directed Columbia to (1) limit disclosure of customer information only to those entities on which Columbia relies for eligibility verification; (2) disclose only that information which is necessary to verify program eligibility; and (3) remove the language "publish, ... ,in-any [sic] manner as Columbia deems appropriate" and "release-from-any-liability [sic]" from its customer release forms. *July 8, 2015 Order* at 31. The Commission further noted that Columbia has yet to remove these provisions from its CAP Agreement Form and any other communications to customers. *June 15, 2023 Order* at 29. The Commission directed Columbia to clarify all CAP customer requirements and to submit a revised *CAP Customer Agreement Form* consistent with its Proposed 2024 USECP and directives from the July 2015 Order. *June 15, 2023 Order* at 29. Columbia identified that its CAP Agreement Form complies with the Commission's 2015 directive. *See Supplemental Information* at 42, Attach. A.

Columbia appears to have revised its CAP Agreement Form to use the following language and has limited the paragraph. Attachment A provides that the CAP participant:

Authorize Columbia Gas to share and use data including, but not limited to, income, and household member information furnished by me or on my behalf regarding me or members of my household concerning any application for, or participation in, the Program, with the Public Utilities Commission and entities on which Columbia relies for Program eligibility verification. Such sharing and use of the information shall be consistent with applicable law.

Supplemental Information at 42, Attach. A.

The OCA still has concerns about the breadth of entities that could be included with “on which Columbia relies for Program eligibility verification.” *Id.* The number of entities that could be included within that language is still very broad and potentially could include entities such as a third-party credit agency or other entities with which Columbia has a business relationship. The sharing of the data should be restricted to the Public Utility Commission, other state or federal agencies for the purposes of income verification, or the Company’s vendor acting on behalf of the Company.

O. Payment Troubled Requirement

Consistent with the CAP Policy Statement, Columbia proposes as a part of its 2024-2028 USECP to eliminate the payment-troubled requirement for low-income customers to qualify for CAP. Proposed 2024-2028 Amended USECP at 10; *June 15, 2023 Order* at 12. The OCA strongly supports the removal of this requirement. The removal of the payment-troubled requirement will ensure continuation of service for low-income customers with limited financial resources who may have been struggling in silence in order to maintain essential natural gas service. Low-income customers may have been put in the position of making untenable choices about where to allocate their limited financial resources. The elimination of the payment-troubled requirement will allow customers access to a more affordable natural gas bill and potentially, if a high use customer, access to weatherization assistance.

P. Ongoing USECP Monitoring and Refinement

The OCA believes that the work of serving low income and vulnerable populations is an ongoing and iterative process that requires continued refinement. To that end, the OCA recommends that Columbia should continue to monitor the program’s outcomes to evaluate whether its USECP is achieving its intended results. The Commission should direct Columbia to

develop specific outcomes, and metrics by which those outcomes should be monitored, with input from its Universal Services Advisory Committee, to be presented by the end of 2024 or Columbia's next base rate case, whichever comes sooner. The following are areas where OCA believes continuous monitoring is appropriate.

First, Columbia would benefit from having a clear outcome objective regarding its disconnection rates. "Universal service" is defined to include those policies, protections and services that help low-income customers maintain natural gas service. In addition to tracking its low-income disconnection rates and reporting its findings to the Commission and the parties, Columbia should include a plan for how it intends to *reduce* its rate of disconnections for low-income customers. Second, Columbia should have a clear outcome objective regarding the percentage of low-income customers in debt.

Third, Columbia should have a clear outcome objective with respect to the percentage of Confirmed Low-Income customers it is enrolling in CAP, with a particular focus on low-income customers who would otherwise be in debt and subject to the disconnection of service for nonpayment. Thus, Columbia should develop results-oriented outcome objectives to set clear goals for increasing its enrollment of Confirmed Low-Income customers in CAP, and retaining those CAP participants once enrolled. It should, as part of the plan it files pursuant to the recommendation above, include an evaluation of its progress at achieving such goals for consideration in future proceedings.

Fourth, as Columbia improves its universal service programs through the first three steps identified above, it should carefully track the costs of its programs. The OCA supports Columbia's proposed changes to the energy burdens because of the benefits provided to CAP participants and

the relatively low impact on other ratepayers. The goal of the revised energy burdens is to improve affordability for low-income customers so that those customers can remain connected to service.

III. CONCLUSION

The OCA appreciates the opportunity to Comment on Columbia's Universal Service & Energy Conservation Plan, as well as the *Supplemental Information* provided by Columbia Gas in response to the Commission's June 15, 2023 Order. The OCA respectfully submits that its Comments and recommendations contained herein should be adopted.

Respectfully submitted,

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