



October 19, 2023

**VIA EFILE**

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

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

***Letter of CAUSE-PA in lieu of Answer to Petition to Incorporate LC-LIURP as a Permanent Program and to Implement Other Technical Changes to NFG's Approved 2022-2026 USECP***

Dear Secretary Chiavetta:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) submits the following Letter in lieu of a formal Answer to the Petition of NFG to Incorporate LC-LIURP as a Permanent Program and to Implement Other Technical Changes to NFG's Approved 2022-2026 Universal Service and Energy Conservation Plan (USECP or Plan), which was filed with the Pennsylvania Public Utility Commission (Commission) on October 16, 2023. As explained herein, CAUSE-PA is not opposed to NFG's Petition and urges the Commission to review and approve NFG's proposal without delay.

On March 31, 2021, NFG filed its USECP for 2022-2026, including modifications to amend its universal service program offerings to improve customer affordability. On May 3, 2022, the Commission entered an Order approving NFG's USECP (May 3 Order), with certain modifications. These modifications included extending the Low Consumption Low Income Usage Reduction Program (LC-LIURP) pilot through January 2023 and expanding the annual

consumption eligibility criteria to include those customers whose natural gas consumption is at or exceeds 900 CCF (reduced from 1,000 CCF) but less than 1,300 CCF.<sup>1</sup>

On May 18, 2022, NFG filed a Petition for Reconsideration (May 18 Petition), requesting the Commission suspend regulatory deadlines for implementation of NFG's Customer Assistance Program, the Low Income Ratepayer Assistance (LIRA) Program. In its May 18 Petition, NFG explained that it was requesting a suspension to make necessary IT upgrades so that it could file a USECP amendment to install a PIP program that would replace the currently approved LIRA Program. CAUSE-PA indicated its non-opposition to the May 18 Petition. On July 14, 2022, the Commission entered an Order granting NFG's May 18 Petition and directed the Company to file a separate Petition seeking approval to transition its LIRA to a PIP program. The Order entered on July 14 additionally stayed the LIRA IT deadlines specified in the May 18 Petition, approved NFG's Plan Compliance Filing (filed June 14, 2022), and directed NFG to implement all amendments to its USECP approved or directed by the Commission's May 3 Order.

On October 12, 2022, NFG filed a Petition (October 12 Petition) seeking to modify its LIRA to a PIP design and amend its LIRA application.<sup>2</sup> CAUSE-PA collaborated with NFG and the Office of Consumer Advocate (OCA) to develop the PIP program and indicated support of the modifications included in the October 12 Petition. On December 22, 2022, the Commission issued an Order granting the Petition.

On October 16, 2023, NFG submitted the instant Petition seeking expedited relief to accomplish three primary purposes. First, NFG seeks to incorporate its LC-LIURP as a permanent program among its Universal Service offerings and expand LC-LIURP program eligibility so that an increased number of customers in need of weatherization services can access the Program. (Petition at pp. 9-12). Second, NFG requests Commission approval to implement certain technical modifications in anticipation of conversion of NFG's LIRA to a PIP, including adjusting the manner in which the average monthly LIRA bill is calculated. (*Id.* at pp. 13-14). Finally, the instant Petition requests Commission approval to conform NFG's 2022-2026 Plan to provisions in NFG's rate case Settlement, approved by Order of the Commission on June 15, 2023. (*Id.* at pp. 14-15).

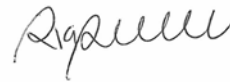
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<sup>1</sup> National Fuel Gas Distribution Corporation's Universal Service and Energy Conservation Plan for 2022-2026 (Final Order), Docket No. M-2021-3024935, page 44, (Order entered May 3, 2022).

<sup>2</sup> As described in the October 12 Petition, under the PIP, LIRA customers would pay the lesser of their monthly average payment or their PIP amount. The average bill amount would be determined by multiplying the rolling 12-month average consumption by the rate applicable to the non-LIRA residential customer.

CAUSE-PA has been an active participant throughout this proceeding and does not oppose NFG's proposed expedited relief, as described above. CAUSE-PA is appreciative of the collaborative process employed by NFG, consulting with CAUSE-PA and with OCA and incorporating our feedback. We urge the Commission to approve the Petition expeditiously and in its entirety, as further delay could unnecessarily postpone implementation of critical Commission-approved improvements to NFG's universal service programs.

Sincerely,



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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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**Certificate of Service**

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

**VIA EMAIL**

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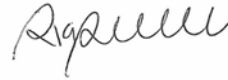
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Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
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