

COMMONWEALTH OF PENNSYLVANIA



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October 30, 2023

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

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

Dear Secretary Chiavetta:

On October 16, 2023, National Fuel Gas Distribution Corporation (National Fuel or Company) filed a Petition to Adopt a Low-Consumption Low-Income Usage Reduction Program (LC-LIURP) through the Remainder of National Fuel's Approved 2022-2026 USECP and to Make Other Technical Modifications to its Plan (the Petition). NFG has requested expedited relief for its Petition. Petition at 1. In the Petition, National Fuel requests to expand eligibility for its LC-LIURP program and to offer the program as a weatherization program for the remainder of National Fuel's LIURP. Petition at ¶ 13. As National Fuel correctly states in its Petition, the Company consulted with the Office of Consumer Advocate (OCA) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) prior to filing this Petition. Petition at 1, ¶ 22. The OCA does not oppose the proposed changes and the relief requested.

As National Fuel states in its Petition, the original LC-LIURP was designed for customers with usage from 1000-1300 ccf of annual usage and at or below 150% of the Federal Poverty Level. Petition at ¶ 7. The original pilot was approved by the Commission on October 24, 2019. Petition at ¶ 8. In its 2022-2026 Plan, National Fuel requested to extend the program through January 2023, and the request to extend the pilot until January 2023 was approved by Commission Order on May 3, 2022. Petition at ¶ 11. National Fuel identified that it has thus far been able to achieve average savings of 15.1% and was able to exceed its target of 40 participants. Petition at ¶ 12. In its Petition, National Fuel stated that it was able to achieve with funding already earmarked for LIURP. Petition at ¶ 12.

In its Petition, National Fuel also proposed certain “PIP Technical Modifications” of its new Percentage of Income Payment (PIP) design that was previously approved by Commission Order on December 22, 2022. Petition at ¶¶ 15-19. National Fuel claims that the proposed modifications will result in greater efficiency, a better understanding of the program for participants, harmonization of the program for those that are not currently enrolled, and with a *de minimus* rate impact. Petition at ¶ 21.

National Fuel also seeks to integrate modifications made to the Plan as a result of the recent base rate proceeding Settlement, in particular an increase to the Neighbor for Neighbor Fund from \$67,000 to \$92,000 on an annual basis beginning FY 2024. Petition at ¶ 25. National Fuel also seeks to correct information regarding the operation for the Neighbor for Neighbor Fund that has been changed as a result of the rate case settlement. Petition at ¶ 26.

As the Company corrected identified in its Petition, the OCA has reviewed the proposed changes, and the OCA does not oppose National Fuel’s proposed changes. Petition at 1. CAUSE-PA also filed a Letter in Lieu of Answer and identified that CAUSE-PA did not oppose the proposed changes. The OCA appreciates National Fuel’s collaborative process and that National Fuel worked to collaborate with the OCA and CAUSE-PA on its proposed changes.

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

If you have any questions, please contact me at (717) 599-8954.

Respectfully submitted,

/s/ Christy M. Appleby
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Certificate of Service

*4861-6250-3051

CERTIFICATE OF SERVICE

National Fuel Gas Distribution Corporation's :
Universal Service and Energy Conservation : Docket No. M-2021-3024935
Plan for 2022-2026 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 Letter in Lieu of an Answer, 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 30th day of October 2023.

SERVICE BY E-MAIL ONLY

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