



November 14, 2023

**Via eFiling**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Docket No. M-2023-3038267**  
**Diversity Policy Statement Revision of 52 Pa. Code §§ 69.801—69.809**  
**Proposed Diversity Policy Statement**

Dear Secretary Chiavetta,

The Energy Association of Pennsylvania (“EAP”) files this letter on behalf of its natural gas and electric distribution company members<sup>1</sup> in support of the Pennsylvania Public Utility Commission’s (“PUC”) proposed additional amendments to its Diversity Policy Statement at the above-referenced docket.

The Diversity Policy Statement addresses diversity reporting for utility employees, diversity reporting for utility vendors, and the development and implementation of utility policies to promote diversity. As a general matter, EAP members are supportive of the Commission’s efforts to promote and implement effective diversity programs within utility companies.

EAP supports the PUC’s proposed revisions to the Diversity Policy Statement as outlined in its August 3, 2023 Order which propose amending certain definitions in the current Diversity

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<sup>1</sup> Hereinafter referred to as NGDCs and EDCs, respectively. Members of EAP include Columbia Gas of Pennsylvania, Inc.; Pike County Light & Power Company; National Fuel Gas Distribution Corp.; PECO Energy Company; Peoples Natural Gas Company LLC; Philadelphia Gas Works.; UGI Utilities, Inc. – Gas Division; UGI Utilities Inc., -- Electric Division; Valley Energy Inc.; Citizens’ Electric Company; Duquesne Light Company; Metropolitan Edison Company; Pennsylvania Electric Company; Pennsylvania Power Company; PPL Electric Utilities; Wellsboro Electric Company; and West Penn Power Company.

Policy Statement for consistency with the Diversity Reporting Regulations found in Chapter 51 of the Commission's regulations at 52 Pa. Code §§ 51.11—51.13,1. Specifically, EAP agrees with the changes suggested for § 69.802 and § 69.802a of the Diversity Policy Statement.

The Association appreciates the opportunity to offer input on the proposed amendments to the Diversity Policy Statement. EAP and its member companies look forward to continue working with the Commission and stakeholders to improve diversity in their workforce and vendor practices.

Very truly yours,

A handwritten signature in blue ink that reads "Donna M.J. Clark". The signature is fluid and cursive, with the first name "Donna" being the most prominent.

Donna M.J. Clark  
Vice President & General Counsel

*via email*

CC:

Joseph P. Cardinale, Jr., Assistant Counsel, Law Bureau  
Rhonda L. Daviston, Assistant Counsel, Law Bureau