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January 8, 2024

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: PA Public Utility Commission, et al., v. Philadelphia Gas Works
Docket Nos. R-2023-3037933; C-2023-3038846; C-2023-3038885; C-2023-3039059;
C-2023-3038727 and C-2023-3039130

Dear Secretary Chiavetta:

Pursuant to Ordering Paragraph 20 of the Opinion and Order dated November 9, 2023, enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Data Sharing and Coordination Plan. Copies are served in accordance with the attached Certificate of Service.

If you have any questions, or require additional information, please contact me. Thank you.

Sincerely,

/s/ Karen O. Moury

Karen O. Moury

KOM/jls
Enclosure

cc: Joseph Magee, Bureau of Consumer Services (w/enc)
Certificate of Service (w/enc)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Data Sharing and Coordination Plan, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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/s/ Karen O. Moury

Karen O. Moury, Esq.

Date: January 8, 2023

Philadelphia Gas Works
Data Sharing and Coordination Plan

January 8, 2024

Docket No. R-2023-3037933

Philadelphia Gas Works (PGW) submits this Data Sharing and Coordination Plan in compliance with the Order entered November 9, 2023 (Order) by the Pennsylvania Public Utility Commission (PUC or Commission) at the above docket. Specifically, this Plan complies with the below:

That Philadelphia Gas Works shall prepare and submit to the Commission for approval plans to carry out the recommendations set forth in Section F.3 of this Opinion and Order. The Company shall file these plans with the Bureau of Consumer Services no later than sixty (60) days [January 8, 2024] after the entry date of this Opinion and Order.¹

Section F.3 of the PUC Order requires that PGW submit the following:

- Plans for outreach to assist with enrollment in CRP (PGW's Customer Responsibility Program) as part of its annual cold weather surveys, if possible, beginning with the pre-December 2023 survey;
- Plans to utilize LIHEAP enrollment data already in its possession to confirm customers' low-income status, to guide outreach efforts, and to facilitate enrollment and retention in CRP;
- Plans to confirm customers' low-income status as promptly and efficiently as possible, using data sharing and in coordination with DHS and Philadelphia's Department of Revenue;
- Plans to develop auto-enrollment and/or cross-processes that facilitate and simplify enrollment of customers in CRP;
- Plans to use shared data to enhance and guide outreach efforts;
- Plans to use shared data to facilitate enrollment and retention in CRP; and
- Plans to expand its collaboration relating to data sharing and coordination to include other state and city agencies and entities.

Compliance Plan – Cold Weather Survey (CWS) Outreach

As part of its annual cold weather survey, PGW provides a packet to the resident that contains information on the various payment options that can restore service. This includes information on:

- PGW's Customer Responsibility Program (CRP) and instructions on how to apply
- Negotiated Payment Arrangements
- Hardship Funds as administered by the Utility Emergency Services Fund
- Low-Income Home Energy Assistance Program (LIHEAP) and Crisis grants

¹ Docket No. R-2023-3037933, Opinion and Order entered November 9, 2023, Ordering Paragraph No. 20. Section F.3 is on pages 222-226 of the November 9, 2023 Opinion and Order.

- Neighborhood Energy Centers that the customer can visit for assistance in applying for these programs

Additionally, in January 2024 and for all future CWSs, PGW will mail a letter and a CRP application designed to educate and encourage the customer to apply for CRP to all premises where a cold weather survey was conducted. In addition, for premises for which PGW has a phone number, PGW will make a phone call informing the most recent customer of record that they may be eligible for CRP and encouraging them to enroll.

Compliance Plan – Data Sharing & Enrollment

1. With respect to future efficiencies and improved customer service, PGW has been a participant in the process of working on a data sharing agreement with the Department of Human Services (DHS). This DHS agreement (“DHS Agreement”) will be subject to legal and risk review prior to entry by PGW, but PGW expects to be able to reach agreement with DHS. PGW has assumed for purposes of this Plan that DHS will obtain appropriate customer consent.
2. Over the years, PGW has modified the CRP to make it easier to enroll, such as via a web application and to increase the benefits of the program by reducing the energy burdens and expanding forgiveness of pre-program debt. PGW submits that it is essential to make CRP easy to access, particularly for customers who have already made the effort to apply for a LIHEAP grant and provide it to PGW. Going forward, PGW will provide communications to all LIHEAP recipients who are not on CRP encouraging them to apply for CRP as follows:
 - Prior to obtaining customer data pursuant to the DHS Agreement, PGW will send a letter and make a phone call to LIHEAP recipients (i.e. CRP-eligible customers) informing them that their household is eligible for CRP and encouraging them to apply.
 - In the future, for those LIHEAP recipients for whom PGW has received income and household information from DHS pursuant to the DHS Agreement, the letter and phone call will request consent to enrollment in CRP. For LIHEAP recipients for whom DHS has provided income and household information to PGW who respond to this letter or phone call within 60 days of notification, PGW will expedite their enrollment in CRP. Thus, these customers will not have to complete a CRP application and provide income information.
 - With respect to expedited enrollment, customers for whom DHS has provided household income and size pursuant to the DHS Agreement will be enrolled at their respective Percentage of Income Payment Plan (PIPP) income level based on the information provided by DHS. Customers for whom DHS has not provided household income and size will need to apply for CRP with eligibility information so that the appropriate PIPP can be determined.
 - Upon enrollment, the customer will receive a welcome letter indicating they have been enrolled and providing them with the rights, obligations, and benefits of CRP. They will also be provided with information on how to exit the program if they decide to do so.
3. PGW will also utilize the LIHEAP recipient data from DHS pursuant to the DHS Agreement for the purposes of auto-recertification.
4. In addition to the above, PGW will identify and then initiate discussions with City agencies and entities, including Philadelphia’s Department of Revenue, for the purposes of potential data sharing and coordination. While agencies and entities outside of the jurisdiction of the

Commission do not have an obligation to enter into any data sharing agreement with PGW and may have different “customers” than the customer in PGW’s system, PGW is hopeful that it will receive sufficient information that will enable it to perform mail and phone outreach to premises enrolled in other programs. To the extent possible, PGW will explore expedited enrollment opportunities as part of these discussions.

As detailed above, CRP enrollment and recertification based on DHS’ income verified LIHEAP data will ensure significant efficiencies, cost savings, and ease of enrollment and recertification for customers. Given the inherent validity of income information DHS will provide to PGW pursuant to the DHS Agreement, ratepayers will be protected from inappropriate/fraudulent CRP costs. For non-DHS data, PGW will examine whether the income data collected by the City would be valid for expedited enrollment, to ensure that CRP costs are not incurred for income ineligible customers. Regardless, there will be significant ratepayer costs related to increasing CRP enrollment.

Estimated Universal Service Surcharge Costs Using Calendar Year 2022 as a Comparison Year

For PGW ratepayers, the cost of significantly increasing CRP participation is not nominal; depending on how the program is increased, the cost could increase by up to an additional ~\$490 a year.

PGW has examined the estimated increase to universal service surcharge CRP costs to enroll non-participants into CRP ranges from approximately \$38.6 million to \$186.0 million, dependent on what group of customers enroll, as explained below. PGW also details the impact on a per customer basis; this increase is particularly important to understand with respect to customers who are near-low-income (i.e. ALICE: Asset Limited, Income Constrained, Employed).

These estimated costs are for the CRP discount and arrearage forgiveness only, which are recovered via a surcharge from all non-CRP firm ratepayers. These estimated figures do not include administrative costs that are not recovered or other Universal Service costs that are included in the Universal Service and Energy Conservation Surcharge (such as LIURP).

- **Base Year Actual CRP Surcharge Related Costs for Comparison.** In Calendar Year 2022, PGW’s CRP costs were \$73.1 million, of which ~\$52.2 million (71.4%) were allocated to residential rate payers via the Universal Service surcharge. This was based on an average monthly enrollment of 51,883. This represented an annual ~\$119.84 cost to each residential non-CRP ratepayer. These numbers are used as a basis for comparison for the estimated costs that would result from increased CRP enrollment.
- **Enrollment of all LIHEAP Participants into CRP.** PGW has estimated that the incremental cost of all LIHEAP participants enrolling into CRP would increase the costs of CRP by ~ \$38.6 million, of which \$27.6 million would be allocated to residential ratepayers. PGW has assumed for the purpose of this evaluation that all customers respond to its outreach, but recognizes that this will most likely not occur. This represents an annual ~\$195.43 cost to each residential non-CRP ratepayer. This estimation was based on adding the customers who received a LIHEAP grant within the current and past LIHEAP season who were not CRP participants as of December 2023 into CRP.

- Comparison Group #2 - Enrollment of all Confirmed Low-Income Customers into CRP. The estimated incremental cost to enroll all 115,093 calendar year 2022 Confirmed Low-Income customers would be an additional ~\$89.0 million, of which \$63.6 million would be allocated to residential ratepayers. This represents an annual \$310.98 cost to each residential non-CRP ratepayer.
- Comparison Group #3 – Enrollment of all Estimated Low-Income Customers. The estimated incremental cost to enroll all 183,969 Estimated Low-Income customers (as reported by the PUC’s Bureau of Consumer Services in 2022 for Philadelphia) would be an additional ~\$186.0 million, of which \$132.9 million would be allocated to residential ratepayers. This represents an annual \$609.94 cost to each residential non-CRP ratepayer.