



**National Fuel**<sup>®</sup>

Dominick A. Sisinni  
Senior Counsel

March 4, 2024

**VIA ELECTRONIC FILING**

Ms. Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street, Second Floor North  
P.O. Box 3265  
Harrisburg, PA 17120-3265

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

Update Relative to the Date of Implementation of National Fuel's  
Percentage of Income Program ("**PIP**") and Request for Secretarial Letter

Dear Secretary Chiavetta:

National Fuel is nearing the date when it will implement the PIP Modifications (defined below) and therefore provides this update.

First, by way of background, on October 12, 2022, National Fuel filed a Petition at the above-captioned docket (the "**Petition**") in which it requested Commission approval to modify its existing customer assistance program ("**CAP**") to a PIP design (the "**PIP Modifications**"). By Order entered on December 22, 2022 (the "**Order**"), the Commission, among other things, approved the relief requested in National Fuel's Petition and requested National Fuel identify the timeline for implementing the PIP Modifications.

**I. PIP IMPLEMENTATION DATE.**

In furtherance of the foregoing, by filing made on September 21, 2023, National Fuel, among other things: (a) specified that it planned to have the PIP Modifications fully implemented by June 3, 2024 (the "**PIP Implementation Date**");<sup>1</sup> and (b) advised that if it were in a position to implement the PIP Modifications sooner than June 3, 2024, it would notify the Commission and parties of record by subsequent letter filed at this docket.

Although the conversion to PIP has required significant time/resources from the Company to implement, such efforts are now wrapping up, with the **Company now anticipating that it will be able to implement the PIP Modifications ahead of the June 3, 2024, date specified**

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<sup>1</sup> On the PIP Implementation Date, National Fuel will: (a) migrate all customers currently enrolled in National Fuel's existing LIRA program to National Fuel's new PIP (*i.e.*, National Fuel will automatically enroll such customers in the PIP); and (b) all bills generated for such customers (from the PIP Implementation Date forward) will be done using the PIP methodology (specified in National Fuel's approved Plan).

in National Fuel's previous filing (with implementation likely occurring during the month of April, 2024).

Given the foregoing, National Fuel respectfully requests a Secretarial Letter be issued at this Docket in which Commission staff shares its determination that a PIP Implementation Date prior to the June 3, 2024, date previously identified by National Fuel is consistent with the December 22, 2022, Order (provided National Fuel notifies the Commission ahead of the implementation of the PIP Modifications promptly upon National Fuel finalizing such date).

National Fuel has shared these updates and its desire to receive the requested Secretarial Letter with the advocates participating in this proceeding, including: (1) the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("**CAUSE-PA**"); and (2) the Pennsylvania Office of Consumer Advocate ("**OCA**" and collectively with CAUSE-PA, the "**Advocates**"). The Advocates have shared their non-objection to same.

## II. PROGRAM NAME CHANGE.

Also in the Petition, National Fuel shared its desire to rename its existing customer assistance program to better reflect its change from a "rate assistance" program to a PIP. In response, the Commission noted in the Order that National Fuel "may propose its new program name for its [customer assistance program] . . . within three months of the PIP implementation date."<sup>2</sup>

National Fuel hereby specifies that the new name of its customer assistance program will be referred to simply as "**CAP**." This name change was shared with National Fuel's USAC as well as the Advocates. This name will also be reflected in a forthcoming non-substantive Plan filing (which will, among other things, remove transitional language in National Fuel's Plan containing references to the soon-to-be-obsolete "rate discount" design of National Fuel's existing LIRA).

In the meantime, should you have any questions or concerns, please do not hesitate to contact me at (814) 871-8177.

Very truly yours,



Dominick A. Sisinni

cc: Per Certificate of Service

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<sup>2</sup> Order at pp. 2-3.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a party)

**VIA E-MAIL:**

Joseph Magee  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
jmagee@pa.gov

Christine Hoover  
Christy M. Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101  
choover@paoca.org  
cappleby@paoca.org

Allison Kaster, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
akaster@pa.gov

Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
Coalition for Affordable Utility Services and Energy Efficiency in  
Pennsylvania  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
emarxpulp@pegalaid.net  
PULP@pautilitylawproject.org  
rpereira@pautilitylawproject.org

Christina Chase-Pettis  
Pennsylvania Public Utility Commission  
Office of Communications  
P.O. Box 3265  
Harrisburg, PA 17101-3265  
cchasepett@pa.gov

Sarah Dewey  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
sdewey@pa.gov

Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
ra-sba@pa.gov

Louise Fink Smith, Esq.  
Pennsylvania Public Utility Commission  
Law Bureau  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
finksmith@pa.gov

Norma Bowman  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
nobowman@pa.gov

Erin Tate  
Pennsylvania Public Utility Commission  
Law Bureau  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
etate@pa.gov

Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101  
cappleby@paoca.org

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Dominick A. Sisinni  
Pa. Supreme Court I.D. No. 322523  
National Fuel Gas Distribution Corp.  
P.O. Box 2081  
Erie, PA 16512  
*Attorney for National Fuel Gas  
Distribution Corporation*