



March 28, 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**") Annual Low-Consumption LIURP Pilot ("**LC-LIURP**") Reporting Pursuant to Orders Entered on December 21, 2023 (the "**December 21, 2023 Order**") and the May 3, 2022 Order (the "**May 3, 2022 Order**" and collectively with the December 21, 2023 Order, the "**Orders**") at Docket No. M-2021-3024935

Dear Secretary Chiavetta:

Pursuant to the May 3, 2022 Order, the Commission, *among other things*, directed National Fuel to serve annual LC-LIURP status updates on an annual basis through 2024 based upon LC-LIURP as it was originally presented ("**Original LC-LIURP**") in its Universal Service and Energy Conservation Plan ("**Plan**") and approved in the May 3, 2022 Order ("**Original LC-LIURP Status Update**").<sup>1</sup> More specifically, the Original LC-LIURP Status Update was to contain reporting on the following: (a) the number of customers served (and projected to be served in each priority level through 2023); (b) total dollars paid out; and (c) total MCFs saved.

Following National Fuel's Petition<sup>2</sup> to expand and continue offering LC-LIURP for the duration of its Plan, the Commission issued the December 21, 2023 Order<sup>3</sup> which, *among other things*, approved LC-LIURP continuing as a pilot program for the duration of National Fuel's Plan (the "**Expanded LC-LIURP Pilot**"); and (b) directed National Fuel to serve annual reports by April 1 each year *beginning in 2024* for the duration of its current Universal Service and Energy Conservation Plan (the "**Expanded LC-LIURP Status Updates**").

On the attached Exhibit A, the Company provides information responsive to both: (a) the final Original LC-LIURP Status Update; and (b) the first Expanded LC-LIURP Status Update.

Very truly yours,

Dominick A. Sisinni

Attachment

cc: *Per Certificate of Service*

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<sup>1</sup> Approval for the Original LC-LIURP approved per the May 3, 2022 Order lasted through January 2023.

<sup>2</sup> See, Petition filed on October 16, 2023 at Docket Nos. M-2021-3024935 and P-2023-3043550.

<sup>3</sup> See, Order of December 21, 2023 entered at Docket Nos. M-2021-3024935, R-2022-3035880, and P-2023-3043550

**EXHIBIT A**

**ORIGINAL LC-LIURP STATUS UPDATE  
(Data Requested per May 3, 2022 Order):**

1. National Fuel's authorization for the Original LC-LIURP Pilot expired in January 2023. The total number of LC-LIURP customers served (a) by year; and (b) in total during the approval period/term of the Original LC-LIURP Pilot are shown below.

a. Original LC-LIURP customers served (*i.e.*, jobs complete) per year (2020, 2021, 2022 and 2023):

**Response:**

Table 1-A								
LC-LIURP Pilot Customers Served Measured by Total Jobs per Year								
	2020		2021		2022		2023	
Priority Class	Jobs	Priority %	Jobs	Priority %	Jobs	Priority %	Jobs	Priority %
1st Priority	5	100%	3	50%	10	36%	2	40
2nd Priority	0	0%	0	0%	6	21%	2	40
3rd Priority	0	0%	3	50%	12	43%	1	20
<b>Total</b>	<b>5</b>	<b>100%</b>	<b>6</b>	<b>100%</b>	<b>28</b>	<b>100%</b>	<b>5</b>	<b>100%</b>

b. Original LC-LIURP customers (*i.e.*, jobs complete) served during the approval period/term of the LC-LIURP Pilot:

**Response:**

Table 1-B		
LC-LIURP Pilot Customers Served To Date Measured by Total Jobs		
Priority Class	Jobs	Priority %
1st Priority	20	46%
2nd Priority	8	18%
3rd Priority	16	36%
<b>Total</b>	<b>44</b>	<b>100%</b>

NOTE: National Fuel had targeted a total of 40 Original LC-LIURP jobs and completed 44.

2. Total LC-LIURP dollars spent by National Fuel during each year of the Original LC-LIURP Pilot:

**Response:** National Fuel has spent a total of \$228,002.78 in on the LC-LIURP Pilot. From this figure, National Fuel spent \$20,375.52 in 2020; \$36,025.94 in 2021; \$152,398.52 in 2022; and \$19,202.80 in 2023.

3. Total MCFs saved as a result of LC-LIURP jobs completed (measured to date).

**Response:**

Table 2*					
Energy Savings (Measured in MCF's) for Completed LC-LIURP Jobs (Measured at 12 Months Post-Completion)**					
Line	Description	Pre -MCF	Post - MCF	MCF savings	% savings
1	Savings for 39 Completed LC-LIURP Jobs Receiving Full Weatherization Measures (through January 2023)**	143.3	120.4	22.9	16.0%
2	<b>Savings for All 41 completed Original LC-LIURP Jobs (through January 2023)***</b>	<b>143.1</b>	<b>121.9</b>	<b>21.2</b>	<b>14.8%</b>

**Notes:**

\* Since the LC-LIURP Pilot requires energy savings (MCF) to be measured for a full 12 months following completion of the weatherization measures, the jobs cited above contains information from 2020 through the Original LC-LIURP's approval which ending in January 2023. While Tables 1A and 1B reflect a total of 44 jobs were performed for Original LC-LIURP, National Fuel only has post-data for 41 jobs. These 41 jobs form the basis of the data in this Table 2.

\*\* Calculated using normalized consumption.

\*\*\* Calculated using normalized consumption. Line 1 and Line 2 differ in that, Line 1 includes data for all completed jobs for which National Fuel has 12 months post-consumption data, whereas Line 2 contains information for the subset of LC-LIURP jobs which received full weatherization (*i.e.*, two jobs had furnace repair/replacement only).

**EXPANDED LC-LIURP STATUS UPDATE**  
**(Data Requested per December 21, 2023 Order):**

1. Program spending for the Expanded LC-LIURP for the recently completed program year (*i.e.*, 2023), separated into budgeted amounts for LC-LIURP jobs and administrative costs.

**Response:** National Fuel did not receive approval to offer the Expanded LC-LIURP Pilot until December 21, 2023. Accordingly, National Fuel was unable to offer any Expanded LC-LIURP Pilot jobs during 2023 and does not therefore have any data to report.

2. Projected Expanded LC-LIURP program spending for the current program year (*i.e.*, CY2024), separated into budgeted amounts for Expanded LC-LIURP jobs and administrative costs.

**Response:**

<b>Table 3: Projected LC-LIURP Program Spending</b>	
Projected Spending	\$574,900
Administrative Cost	\$86,235

3. Total number of Expanded LC-LIURP jobs completed for the recently completed plan program year (*i.e.*, CY 2023).

**Response:** National Fuel did not receive approval to offer the Expanded LC-LIURP Pilot until December 21, 2023. Accordingly, National Fuel was unable to offer any Expanded LC-LIURP Pilot jobs during 2023 and does not therefore have any data to report.

4. Number of Expanded LC-LIURP jobs projected to be completed for the current program year (*i.e.*, CY 2024).

**Response:** National Fuel projects completing 148 Expanded LC-LIURP jobs during CY 2024.

5. Average Expanded LC-LIURP job costs for the recently completed program year (*i.e.*, CY 2023).

**Response:** National Fuel did not receive approval to offer the Expanded LC-LIURP Pilot until December 21, 2023. Accordingly, National Fuel was unable to offer any Expanded LC-LIURP Pilot jobs during 2023 and does not therefore have any data to report.

**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)

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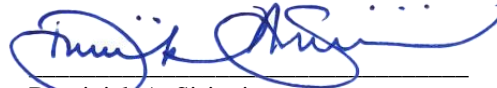
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