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File #: 199787

May 30, 2024

VIA ELECTRONIC FILING

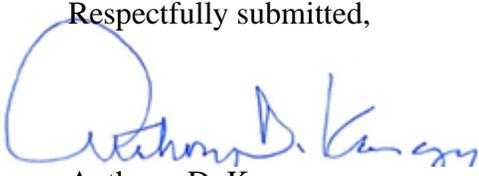
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PA PUC, et al. v. Peoples Natural Gas Company LLC
Docket Nos. R-2023-3044549, et al.**

Dear Secretary Chiavetta:

Attached for filing please find the Low-Income Stipulation submitted on behalf of Peoples Natural Gas Company LLC (“Peoples”) in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/kl

cc: The Honorable Mary D. Long (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: May 30, 2024



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al.</i>	:	
	:	Docket Nos. R-2023-3044549, <i>et al.</i>
v.	:	
	:	
Peoples Natural Gas Company LLC	:	

STIPULATION

Peoples Natural Gas Company LLC (“Peoples” or “the Company”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Pennsylvania Weatherization Providers Task Force (“PWPTF”) (together, the “Stipulating Parties”), by their respective counsel, hereby enter into this Stipulation to address issues raised by CAUSE-PA and PWPTF in the above-referenced base rate proceeding. The Stipulating Parties request that Administrative Law Judge Mary D. Long and the Pennsylvania Public Utility Commission (“Commission”) approve and adopt this Stipulation without modification.

I. Terms of the Stipulation

A. Low Income Customer Issues

1. The Company will modify its definition of and reporting for “confirmed low income customer” data to include self-attestation for all purposes, including but not limited to the annual Universal Service Report, consistent with the Commission’s definition in 52 Pa. Code § 62.2. Peoples will utilize this definition for reporting on 2024 data and will maintain this method of reporting for all future years.
2. The Company commits to maintaining its existing business relationship with Community Based Organizations (“CBOs”), subject to each individual CBO’s continued performance in conformance with the Company’s Universal Service and Energy Conservation Plan (“USECP”) rules and their contract with the Company.

3. Within 30 days of the entry of this Stipulation, Peoples will refund all currently held security deposits collected from confirmed low income customers, utilizing the Commission's definition of confirmed low income customer in 52 Pa. Code § 62.2.
4. Peoples will initiate a monthly review of security deposits and refund all security deposits being held from accounts designated as confirmed low income to the customer within 30 days.
5. Peoples will report on its monthly results of its low income security deposit refunds at each USAG meeting.
6. Peoples will file a Petition at its current USECP docket within 90 days of a final order in this case seeking authorization to amend its USECP to allow the Company to initiate auto-enrollment of LIHEAP recipients with significant balances into CAP, to permit auto-recertification, and to waive income documentation requirements for CAP applicants that have received LIHEAP in the last two years. The settling parties are not bound to take a certain position regarding Peoples' Petition.
7. Peoples will work with the USAG to develop a list of non-emergency call scenarios that Peoples can use for agent training to screen for income level and CARES/CAP referrals.
8. Peoples will adopt its proposed 120 Mcf LIURP minimum usage threshold.
9. Peoples will increase its annual LIURP budget to a total of \$3,500,000 per year.
10. Essential shareholders will contribute an additional \$150,000 each year to the Peoples' Hardship Fund until Peoples files its next USECP. This increase will be over and above the funding levels that are currently in place as per the Company's current USECP, and retains the increased contribution established in the Aqua-Peoples Acquisition (Docket Numbers A-2018-3006061 – A-2018-3006063) beyond its original expiration. Nothing will preclude any party from requesting approval of a different budget amount in a subsequent proceeding.
11. The Company will seek guidance from the USAG at its April/July 2024 meetings to gain input into the development of a standalone CAP notice to be included in the cold weather survey packets beginning in September of 2024.

B. Tariff Revisions

12. Add the following language to Rule 3.C (Gas-PA PUC No. 48, Original Page 19), "Provide income documents or other information attesting to his or her eligibility

for state benefits based on household income eligibility requirements that are consistent with those of the public utility's Customer Assistance Program. This information may include, but is not limited to any information listed in 52 Pa. Code 62.2 for the purposes of identifying 'confirmed low income customers'."

13. Add the following language to Rule 3.D (Gas-PA PUC No. 48, Original Page 20) that mirrors the language of 52 Pa. Code § 56.41(B)(4), "Notwithstanding subsection (D), the Company may not require a cash deposit from a customer who is, based upon household income, confirmed to be eligible for a customer assistance program. A customer is confirmed to be eligible for a customer assistance program by the public utility if the customer provides income documents or other information attesting to his or her eligibility for state benefits based on household income eligibility requirement that are consistent with those of the public utility's Customer Assistance Program. This information may include, but is not limited to any information listed in 52 Pa. Code 62.2 for the purposes of identifying 'confirmed low income customers'."
14. Add the following language to Rule 3.B(2), Gas PA PUC No. 48, Original Page No. 19 not Rule 3.E(2), Gas PA PUC No. 48, Original Page No. 19 "*provided that the methodology does not directly, or have the effect of, discriminating based on a protected class as set forth in the federal Equal Credit Opportunity Act.*"
15. The Company will retain Gas-PA PUC No. 48, Original Page 41 Paragraph 7 and will replace: "a. the customer has defaulted on a payment arrangement, and" with "a. the customer has a significant account balance, and".

C. Implementation, Timing, and Consideration

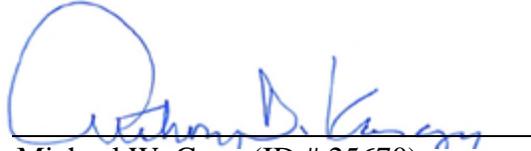
16. All terms in the stipulation are intended to take effect immediately upon entry of a final order in this proceeding without further conditions precedent, unless a different timeline or procedure is explicitly identified in the term.
17. This stipulation is intended to resolve the universal service program and low income customer service issues raised by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Pennsylvania Weatherization Providers Task Force (PWPTF) in this proceeding. As consideration for the terms, CAUSE-PA and PWPTF agree to not oppose the Partial Non-unanimous Settlement between Peoples, the Commission's Bureau of Investigation and Enforcement (I&E), the Office of Small Business Advocate (OSBA), the Pennsylvania Independent Oil & Gas Association (PIOGA) and Peoples Industrial Intervenors (PII).
18. Should the terms of this stipulation be amended, modified, or otherwise rejected by the Administrative Law Judge or Commission, in whole or in part, CAUSE-PA and PWPTF reserve the right to oppose the partial non-unanimous settlement -

including but not limited to the right to file exceptions, a petition for reconsideration, and/or appeal to the Commonwealth Court.

II. Conclusion

THEREFORE, the Stipulating Parties, by their respective counsel, hereby evidence their agreement to the terms of the Stipulation set forth above and respectfully request that the Commission adopt the Stipulation in the Final Order in this proceeding.

Respectfully submitted,



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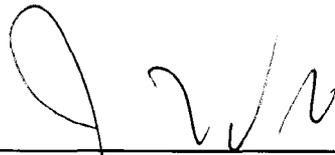
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Date: May 30, 2024

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