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July 25, 2024

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**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Keystone Bldg. 2<sup>nd</sup> Floor W  
400 N. Street  
Harrisburg, PA 17120

RE: Columbia Gas of Pennsylvania, Inc. Universal Service and Energy  
Conservation Plan for 2024-2028 Submitted in Compliance with 52 Pa.  
Code § 62.4  
Docket No. M-2023-3039487

Dear Secretary Chiavetta:

Please accept this filing as Columbia Gas of Pennsylvania, Inc.'s ("Columbia" or "Company") Letter in Lieu of Petition in the above referenced docket. This Letter in Lieu of Petition is filed in follow up to Columbia's Universal Service and Energy Conservation Plan for 2024-2028 ("USECP") that was filed on or about April 5, 2023, and the revised USECP filed on May 6, 2024, pursuant to the Public Utility Commission's ("Commission") Order of April 4, 2024 ("April 4<sup>th</sup> Order"). This filing is styled as a Letter in Lieu of Petition because the minor, 21-day extension needed for Columbia to implement billing changes approved and directed in the April 4<sup>th</sup> Order is not opposed by any party to the underlying proceeding.

More specifically, in the April 4<sup>th</sup> Order, the Commission approved Columbia's proposed revised CAP payment options. See April 4<sup>th</sup> Order at 24. Further, the Commission directed Columbia to remove pre-program arrearage ("PPA") co-payments and the CAP Plus charge from CAP bills. See April 4<sup>th</sup> Order at 28. The Commission directed that these changes be implemented within six months or by October 3, 2024. See April 4<sup>th</sup> Order at 120, ordering para. 20.

In order to implement the aforementioned billing changes, significant programming logic is necessary, which is estimated to take 1,100 hours. Further, once the programming is complete, time is needed to test the system to ensure that the programming changes are working properly before issuing any bills to customers. Also,

Columbia seeks to implement the changes at the start of a full billing cycle in order for all CAP customers to receive the changes during the same billing cycle. For these reasons, Columbia requires slightly more time – until October 25<sup>th</sup> – to implement the aforementioned billing changes.

Once Columbia was aware of the additional time needed to accomplish the required billing changes, the Company reached out to the Commission’s Bureau of Consumer Services (“BCS”), who suggested seeking input on the extension from other interested parties and proceeding with this Letter in Lieu. Columbia reached out to the Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) to discuss the timing issue and need for a 21-day extension to implement the required billing changes. OCA and CAUSE-PA have indicated to Columbia that they do not object to this extension or the filing of this Letter in Lieu.

As such, by this Letter in Lieu, Columbia advises that the billing changes directed in the April 4<sup>th</sup> Order, as set forth above, will be implemented by October 25, 2024. The first bills issued reflecting the billing changes, per the Company’s normal billing cycle, will be bills issued at the beginning of November 2024. Columbia will file a status update on the progress of the billing changes at the above docket by September 1, 2024, and by October 1, 2024, and serve copies thereof on BCS, OCA and CAUSE-PA.

Thank you for your attention to this matter.

Respectfully submitted,



Candis A. Tunilo, Esquire

cc: Certificate of Service  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant) VIA E-MAIL:


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