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July 31, 2024

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027
Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2021-3029323

Dear Secretary Chiavetta:

Pursuant to the Commission's June 13, 2024 Order at Docket No. M-2023-3038944 in the 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Letter regarding its participation in the Department of Human Services' ("DHS") LIHEAP data sharing with regard to the above-referenced matters.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ *Lauren M. Burge*

Lauren M. Burge

Enclosure

cc: Norma Bowman, Bureau of Consumer Services (nobowman@pa.gov)
Louise Fink Smith, Law Bureau (finksmith@pa.gov)
Certificate of Service (Email Only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's LIHEAP Data Sharing 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/ *Lauren M. Burge*

Lauren M. Burge, Esq.

Dated: July 31, 2024

LIHEAP Data Sharing Participation

Philadelphia Gas Works

Docket No. M-2021-3029323 (PGW's USECP 2023-2027)

PGW submits this letter in response to the PUC Order dated June 13, 2024 at Docket No. M-2023-3038944. Specifically, this letter responds to the below:

That an energy public utility choosing to participate in the LIHEAP data sharing shall file and serve a letter, consistent with this Order, at its current and pending universal service and energy conservation plan docket(s).¹

PGW, as indicated in the Order, will participate in the Department of Human Services' (DHS) data sharing and herein addresses the following requirements of the Order:

If an energy public utility chooses to participate in DHS' LIHEAP data sharing, the energy public utility shall file and serve a letter at its current and pending USECP dockets no later than July 31, 2024, indicating it is participating in DHS data sharing and include clarification that the energy public utility will:

- Use the LIHEAP data to conduct individualized universal service outreach as soon as possible (ideally monthly) after receiving the household's data from DHS.
- Use a simplified/streamlined process for households to enroll in universal service programs and recertify in CAP if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, without requiring additional applications or documentation.
- Discuss its plans for individualized outreach and simplified/streamlined enrollment with its respective Universal Service Advisory Group/Committee.
- Send a communication to each auto-recertified CAP participant based on LIHEAP data with their updated CAP bill amount (if applicable) and instructions on how to contact the energy public utility to provide additional updates on household income/size if the household information has changed since completing the LIHEAP application.
- Provide educational materials to inform customers about the purpose and effect of the checkbox on the 2024-2025 LIHEAP application which will grant permission for DHS to share this information with energy public utilities². Include a timeline for when the materials will be provided to customers.

The letter must also identify the provisions in the energy public utility's current and proposed USECP that need to be waived or added to incorporate the data sharing conditions described above.

¹ Docket No. M-2023-3038944, Order entered June 13, 2024, at Ordering Para. 3.

² The PUC encourages use of the educational template developed by the USWG Data Sharing Subgroup which is attached as Appendix A. The template includes language that could be used for bill inserts, on-bill messaging, communications with CAP and County Assistance Office administrators, and the utility's website.

Additionally, if an energy public utility chooses to participate in LIHEAP data sharing with DHS, the energy public utility shall include the following in its next proposed USECP:

- A description of its participation and compliance – or reasons for non-compliance – with the above activities.
- A summary of the impacts of LIHEAP data sharing on enrollments for all universal service programs and recertifications in CAP.
- Provisions to incorporate future data sharing from LIHEAP or other programs/agencies.

PGW's utilization of DHS shared data

As evidence of its commitment to ensuring accessibility for all CRP-eligible customers, PGW previously described its intent to participate in DHS data sharing initiatives on a PUC docket. As part of PGW's base rate case proceeding (Docket No. R-2023-3037933), PGW filed a *Data Sharing and Coordination Plan* on January 8, 2024 which detailed PGW's plan for participating in DHS' data sharing program. This plan is attached as Appendix A hereto.

The below clarifies how PGW will use the DHS data:

1. Shared Data & Eligibility

- PGW will manually review the shared data provided by DHS and identify those customers who are currently not enrolled in CRP. PGW hopes to receive DHS data on a monthly basis and, if so, will communicate with customers on a monthly basis.
- Using the data provided, PGW will evaluate CRP eligibility for customers not on CRP.
- Also, PGW will calculate these customers' estimated CRP monthly amounts for utilization in enrollment outreach, as described below.

2. Monthly Outreach Letter

- PGW will send a letter to CRP eligible customers which will include an explanation of:
 - PGW's utilization of the shared data
 - The benefits and responsibilities of CRP
 - The customers' estimated CRP monthly amount; and
 - A request for customer consent for CRP enrollment
- PGW notes that, given recent PUC policy changes, household income for purposes of CRP enrollment differs from DHS' eligibility determination for LIHEAP benefits. Pursuant to PGW's most recent Universal Service plan Order, unearned income from minors has been excluded from the household income calculation.³ DHS includes unearned income of minors in its household income calculation. PGW submits that for efficiency and consistency, PUC policy on household income should be consistent with DHS' definition and include unearned income of minors in its CRP eligibility calculation.

³ *Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027 Submitted in Compliance with 52 Pa. Code § 62.4*, Docket No. M-2021-3029323, Order entered Jan. 12, 2023, at Ordering Para. 5(j).

- Customers will also be provided with instructions in the letter regarding how to contact PGW to provide additional updates on household income and size if the information has changed since they last completed the LIHEAP application.

3. Administration

- PGW's process will provide an expedited enrollment, meaning that the customer will not be auto-enrolled, but will not have to complete a full CRP application. In order to finalize enrollment in CRP, the customer will consent to CRP enrollment by signing and returning the letter to PGW.
- PGW stresses the need for a signed consent to ensure there is an express and documented understanding of the benefits and responsibilities that the customer has accepted with CRP enrollment.
- With respect to customers currently enrolled in CRP for whom PGW receives data from DHS, PGW will automatically recertify the customer. A letter will be sent to the customer informing them that PGW has recertified them and that the recertification will last for 2 years.

4. Other Updates

- In its next USECP, PGW will make updates to explicitly allow for the enrollment and recertification of customers using DHS' shared LIHEAP data. The current USECP only allows for the customer to complete a full application.
- PGW's next Universal Service Advisory Committee (USAC) meeting is in September 2024. PGW will discuss its plans for individualized outreach and streamlining enrollment with the group.
- PGW will conduct education related to this data sharing. The PUC developed a template for such purpose, which is attached as Appendix B hereto. PGW will utilize this template to create a bill insert, an on-bill message with a web link, and materials for its website. PGW will also use the template to provide education for local Neighborhood Energy Centers.

Appendix A: Compliance Plan – Data Sharing & Coordination

Below is an excerpt from pages 2-3 of PGW’s Data Sharing and Coordination Plan, as filed on January 8, 2024 in Docket No. R-2023-3037933:

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.

Appendix B: PUC's Proposed Language for Educational Material

LIHEAP applicants/recipients now have the option to share certain LIHEAP application information directly with public utilities to help you enroll in your utility's low-income programs. Your household may be eligible for a discount on your energy bill and/or additional benefits, including past debt forgiveness, through a public utility's low-income assistance program.

How to use the checkbox:

When filling out your LIHEAP application, you'll come across a checkbox with the following statement:

I allow DHS to share my income and household information with my utilities to help enroll me in a utility assistance program. I understand that my utility may need to contact me for additional information before I am enrolled in a utility assistance program.

You have the choice to either check the box or leave the box unchecked. It's entirely up to you.

Why would you want to share your data with public utilities?

Sharing your LIHEAP data with public utilities can help qualify you for additional discounts through the low-income assistance programs offered by public utilities. The purpose of this program is to help you get enrolled in your utility's low-income assistance program faster and easier. It also helps ensure that you do not need to provide the same information multiple times.

Sharing your data may also help speed up the application process because you may not have to provide the same household income information again to enroll in the public utility program.

Allowing LIHEAP to share this data directly with your public utility could help you get enrolled in public utility assistance programs that can save you a significant amount of money.

What information is being shared?

The information that is being shared with public utilities includes:

- * Name of utility account holder and all household members
- * Service address
- * Phone number
- * Email address
- * Income (amount and source) for all household members
- * Age/Date of Birth for all household members

How will my data be used?

Public utilities will use your data to make it easier to verify your income and household information so you can enroll in their low-income programs, such as a customer assistance program, a utility-run weatherization program, or a hardship fund. They may also use your data to contact you about these programs.

Is my data safe?

Yes, your privacy matters. LIHEAP and public utilities are required to protect the confidentiality of your data. Your data will only be used for the specific purposes of outreach and/or determining eligibility for

low-income programs provided by your public utility and will not be sold to third parties or used for any other purpose.

Can I opt out of data sharing?

Yes. You can opt out of data sharing by leaving the checkbox unchecked on the LIHEAP application. If you opt out of data sharing, it will not impact your LIHEAP application in any way. However, it may take longer to apply or recertify for other types of public utility assistance, such as your utility's customer assistance program.

If you have any questions about LIHEAP data sharing, you can contact your local county assistance office, public utility, or the Pennsylvania Office of Consumer Advocate.

Additional information:

You have the right to access and correct your data.

You can withdraw your consent to data share at any time.