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July 31, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

**Re: Columbia Gas of Pennsylvania, Inc.
to Proposed 2024-2028 Universal Service and Energy
Conservation Plan
Docket No. M-2023-3039487**

Dear Secretary Chiavetta:

Please accept this as Columbia Gas of Pennsylvania Inc.'s ("Columbia" or "Company") confirmation of its participation in the Department of Human Services' ("DHS") LIHEAP Data Sharing pursuant to the Public Utility Commission's Order of June 13, 2024, at Docket No. M-2023-3038944 ("Order"). As required in the Order, the Company submits the following clarifications:

The Company intends to use the LIHEAP data to conduct individualized universal service outreach. Due to the short time frame and IT resource limitations for this heating season, the Company will conduct at least one outreach attempt for LIHEAP recipients who are not enrolled in Columbia's Customer Assistance Program ("CAP"). The outreach effort will be conducted by mail or email. The Company will attempt to make this contact within the first month after receiving the household's data from DHS. However, due to the large number of grants that are provided at the start of the season and the manual process that will be involved, it may take as long as two months to reach out to all customers. The Company will track the success of the two communication avenues and discuss the best options for future years with its Universal Service Advisory Committee ("USAC").

The Company will use a streamlined process for LIHEAP recipients to enroll in universal service programs that does not require proof of income. Income will also be used to recertify customers in CAP, without requiring an updated application or additional documentation, if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year.

The Company will discuss its plans for individualized outreach and its streamlined enrollment with its USAC.

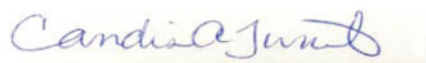
Currently, the Company automatically re-verifies customer income for up to three years based on the receipt of a LIHEAP grant and sends a letter to the customer stating if anything has changed to notify the Company and that otherwise, no further action is required. The Company will develop a letter to send to CAP participants who are automatically recertified based on LIHEAP data, which will inform customers of their updated bill amount (if applicable) and instructions on informing the Company of any changes to household income/size if the household information has changed since completing the LIHEAP application. This letter will be ready in time for the 2025-2026 heating season.

The Company will provide information on its website to inform customers of the purpose and benefits of the checkbox on the 2024-2025 LIHEAP application, which provides permission for DHS to share this information with energy public utilities. This information will be available for the start of the 2024-2025 heating season.

The Company's recently approved USECP includes the following provision: "CAP customers who receive LIHEAP or whose primary income is SSI or pensions are required to re-verify their income once every three years at a minimum." The Company requests to remove the language "who receive LIHEAP or" to eliminate the requirement that customers who receive LIHEAP verify income with the Company every three years.

Please contact Deborah Davis, Columbia's Manager, Universal Services, at (412) 841-4928 or at ddavis@nisource.com, should you have any questions or concerns regarding this matter.

Very truly yours,



Candis A. Tunilo

cc: Parties of Record (w/enc.)
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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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