



August 15, 2024

To: All Parties of Record at Docket No. M-2023-3039487, Columbia's Universal Service and Energy Conservation Plan for 2024-2028

**RE: Compliance Issue with Columbia Gas of Pennsylvania, Inc
Revised 2024-2028 USECP, Docket No. M-2023-3039487**

Overview

On April 4, 2024, the Pennsylvania Public Utility Commission (Commission) entered an Order (April 2024 Order) at the captioned docket directing Columbia Gas of Pennsylvania, Inc. (Columbia) to, *inter alia*, submit a revised 2024-2028 Universal Service and Energy Conservation Plan (2024 USECP) within 30 days reflecting changes consistent with the April 2024 Order. The Commission approved the 2024 USECP conditioned upon Columbia incorporating the changes directed in the April 2024 Order.

On April 19, 2024, Columbia filed a Petition for Reconsideration (Columbia Petition). On May 6, 2024, Columbia filed clean and redlined versions of its revised 2024 USECP (May 6 Compliance Filing). To date, no protests or other responsive pleadings have been filed relative to the May 6 Compliance Filing. On July 11, 2024, the Commission entered an Order (July 2024 Order) addressing the Columbia Petition which directed the public utility to, *inter alia*, file a further revised USECP within 20 days consistent with the April 2024 and July 2024 Orders.

On July 26, 2024, Columbia filed clean and redlined versions of its further revised 2024 USECP (July 26 Compliance Filing).¹ To date, no protests or other responsive pleadings have been filed relative to the July 26 Compliance Filing.

As directed by the April 2024 Order, the Commission's Bureau of Consumer Services (BCS) has reviewed the July 26 Compliance Filing. BCS has identified one area where the further revised 2024 USECP is inconsistent with the April 2024 Order. Specifically, the April 2024 Order directed Columbia to "...count earned and unearned income for all adults (*i.e.*, age 18 and over) when determining household income for [Customer Assistance Program (CAP)] eligibility." April 4 Order at 115, OP #5(c). In the July 26 Compliance Filing, Columbia defines counted household income as "all earned and unearned income from household members *over* the age of 18" (emphasis added). July 26 Compliance Filing at 28. Excluding income for adults who are 18 years of age when determining eligibility for Columbia's CAP is inconsistent with the April 2024 Order.

Columbia must address this non-compliance issue in a further revised 2024 USECP.

¹ Unless otherwise specified, all references to the July 26 Compliance Filing refer to the clean version of the revised 2024 USECP.

With the exception of the issue noted above, BCS finds that Columbia has included appropriate provisions relative to the April 2024 and July 2024 Orders in its July 26 Compliance Filing.

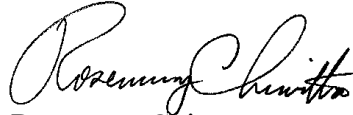
Conclusion

Accordingly, within 20 days, Columbia is directed to file and serve a further revised 2024 USECP that addresses the issue related to household income identified in this Secretarial Letter. Columbia may submit its further revised 2024 USECP to BCS for an informal compliance review prior to filing.

The determinations in this Secretarial Letter have been made by BCS staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. These determinations relative to the requirement of a further revised 2024 USECP by BCS staff will be deemed to be the final action of the Commission unless reconsideration of the directives in this Secretarial Letter is sought from the Commission within 20 days after service of this Secretarial Letter. *See* 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

If you have any questions, please contact Norma Bowman in the Commission's Bureau of Consumer Services at nobowman@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

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