



Candis A. Tunilo  
*Senior Counsel*  
*Legal Department*

800 N. Third Street  
Suite 204  
Harrisburg, PA 17102  
Cell: 223-488-0794  
ctunilo@nisource.com

August 29, 2024

***VIA ELECTRONIC FILING***

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

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

Dear Secretary Chiavetta:

Pursuant to the Secretarial Letter of August 15, 2024, identifying a compliance issue with the Revised 2024-2028 Universal Service and Energy Conservation Plan ("Revised Plan") filed by Columbia Gas of Pennsylvania, Inc. ("Columbia") on July 26, 2024, enclosed please find a further Revised Plan. Both clean and red-lined versions of the further Revised Plan are enclosed.

Additionally, pursuant to the Secretarial Letter of August 6, 2024, granting Columbia's Letter in Lieu of Petition for an extension to implement USECP-related billing changes, Columbia provides the following status update: Columbia remains on track to complete the necessary programming and testing by Friday, October 25, 2024. The first bills will be issued on Monday, October 28, 2024, which is the first billing unit for November 2024.

Should you have any questions, please do not hesitate to contact the undersigned at (223) 488-0794.

Very truly yours,

A handwritten signature in blue ink that reads "Candis A. Tunilo". The signature is written in a cursive style and is placed on a light-colored rectangular background.

Candis A. Tunilo  
Enclosure

cc: Parties of Record (w/enc.)

Joseph Magee - Bureau of Consumer Services [jmagee@pa.gov](mailto:jmagee@pa.gov)

Norma Bowman – Bureau of Consumer Services [nobowman@pa.gov](mailto:nobowman@pa.gov)

Christina Chase-Pettis - Office of Communications [cchasepett@pa.gov](mailto:cchasepett@pa.gov)

Stephanie Wilson - Law Bureau [stephwilson@pa.gov](mailto:stephwilson@pa.gov)

Louise Fink Smith - Law Bureau [finksmith@pa.gov](mailto:finksmith@pa.gov)

**Columbia Gas of Pennsylvania, Inc.**

**Universal Service**

**And**

**Energy Conservation Plan**

**2024- 2028**

# Table of Contents

Plan Submission .....	4
Historic Overview.....	4
Modifications to the Plan for 2024 - 2028 .....	12
Integration .....	12
Outreach .....	14
Staffing .....	14
Universal Service Program Responsibilities .....	14
Budgets .....	17
Program Descriptions .....	18
CARES (Customer Assistance Referral and Evaluation Services) Scope .....	18
Key Objectives.....	19
Eligibility Criteria .....	19
Program Components.....	20
Victims of Domestic Abuse Policy .....	20
LIURP (Low Income Usage Reduction Program) Scope .....	20
Key Objectives.....	20
Eligibility Criteria .....	21
Program Components.....	21
Key Objectives .....	23
Eligibility .....	24
Program Components .....	24
Projected Enrollment.....	25
HARDSHIP FUND .....	25
Key Objectives.....	25
Eligibility Criteria .....	25
Treatment of CAP Customers .....	26
Program Components.....	26
Fundraising.....	26
CAP (CUSTOMER ASSISTANCE PROGRAM) .....	27
Key Objectives.....	27
Eligibility Criteria .....	28
Program Components Administration.....	28
Intake and Enrollment.....	29
Customer Responsibilities.....	30

Usage Controls .....	30
Transfer of Service .....	31
Default Provisions.....	31
Default Provisions for Nonpayment of CAP Budgets .....	31
Default Provisions for Customers Requesting Removal from CAP .....	32
Default Provisions for Customers with High Consumption .....	32
Re-connect Procedures .....	32
Security Deposits.....	33
Reconnection fees & Late fees .....	33
Re-instatement .....	33
CAP Balance Clarification for re-entry into CAP less than four years from removal date .....	34
CAP Re-instatement for Customers out of CAP for four years or more.....	34
Re-verification.....	34
Arrearage Retirement .....	35
Universal Service Needs Assessment.....	35
Projected Enrollment .....	39
LIURP Health & Safety Study.....	Attachment A
CAP Customer Agreement Form.....	Attachment B
Acceptable Income for CAP.....	Attachment C
Zero Income Form.....	Attachment D
Customer Outreach & Education Plan.....	Attachment E

# **Columbia Gas of Pennsylvania, Inc.**

## **Universal Service and Energy Conservation Plan**

### **Plan Submission**

Section 62.4 of the Pennsylvania Public Utility Commission's ("Commission") regulations requires natural gas distribution companies to file updated Universal Service and Energy Conservation Plans every three years. 52 Pa. Code § 62.4. On June 27, 2014, by Secretarial Letter, the Commission notified Columbia Gas of Pennsylvania, Inc. ("Columbia" or the "Company") of a new plan submission schedule. Columbia hereby submits its Universal Service and Energy Conservation Plan for plan years 2024 through 2028.

As Universal Service includes energy efficiency programs such as the Low Income Usage Reduction Program ("LIURP"), individual universal service and energy conservation programs referenced herein will be referred to as "Universal Service," and the Universal Service and Energy Conservation Plan will be referenced as the "Plan" or the "Universal Service and Energy Conservation Plan."

### **Historic Overview**

Columbia submitted its first Universal Service and Energy Conservation Plan in August 1999, as part of its Restructuring Filing as required by the Natural Gas CHOICE and Competition Act in Case No. R-00994781. 66 Pa.C.S. Chapter 22. The Commission approved the Plan as part of settlement agreements from Case No. R-00994781 in October and December of 1999. Provisions within those settlements included an enrollment target for the Customer Assistance Program ("CAP") and a funding level for LIURP. Additionally, the approved settlements provided for a temporary funding source for Columbia's Universal Service Program with the expectation that a permanent funding mechanism would be developed later. The Commission approved modifications to Columbia's CAP funding mechanism in 2001 and 2002.

Columbia submitted its second Universal Service and Energy Conservation Plan in November 2002 (for the years 2003 through 2005), which the Commission approved in January 2003. In October 2003, Columbia received Commission approval for a permanent CAP funding mechanism, which allowed for recovery of projected shortfall and application costs, based upon the current and estimated customers in the program and the cost of gas. The mechanism is part of the pass-through charge on customer bills and is adjusted at the same time as the quarterly gas cost adjustment.

In 2005, Columbia submitted its third Universal Service and Energy Conservation Plan (for years 2006 through 2008), which the Commission approved in January 2006. It included the establishment of a remedial conservation education program for high consumption CAP customers who had already received weatherization services, along

with an external evaluation of its LIURP program. Funding and enrollment remained consistent with the previously approved plan from 2003.

In 2008, Columbia filed its fourth Universal Service and Energy Conservation Plan for years 2009-2011 as part of its base rate case at Docket No. R-2008-2011621. The Plan was approved as part of the settlement of that case. The approved plan featured an increase in LIURP spending from \$1,700,000 to \$3,000,000.

In August 2010, Columbia filed a Petition to Modify its 2009-2011 Plan in order to implement the "CAP Plus" program. (Docket No. P-2010-2195759) The Commission approved Columbia's Petition in October 2010 and Columbia implemented CAP Plus in November 2010. Under CAP Plus, CAP participants are billed an applicable "Asked to Pay" amount, as well as an additional "Plus" amount that is intended to balance affordability for CAP customers and cost responsibility for non-CAP customers. The Plus amount is currently calculated as follows: (total Low Income Home Energy Assistance Program ("LIHEAP") receivables from the prior heating season divided by the number of active CAP participants at the start of the current LIHEAP season divided by 12.) As of the date of this filing, Columbia's CAP is based on the CAP Plus model approved in Docket No. P-2010-2195759.

Also, in the third quarter of 2010, Columbia secured the services of an independent third-party consultant to perform a comprehensive impact evaluation of Columbia's Universal Service Programs. In November 2010, Columbia filed its independent evaluation of the Universal Service Programs. The independent evaluator, Melanie Popovich, noted that "throughout this document, the evaluator makes note of the proactive approach taken by the Company's management team in order to address the barriers to program effectiveness. The Company is to be commended on its willingness to engage third party experts to undergo external studies for further program improvement. ... In my opinion as an evaluator, Columbia strives for continuous improvement and has one of the most efficient and effectively managed Universal Service Programs in the state."

In 2011, as part of the approved settlement of its rate case proceeding at Docket No. R-2010-2215623, Columbia agreed to increase its LIURP budget from \$3,000,000 to \$4,000,000. One party to that proceeding, the Pennsylvania Communities Organizing for Change d/b/a ACTION United ("PCOC"), challenged Columbia's CAP Plus program. Specifically, PCOC alleged that the Company's CAP Plus program did not comply with the Pennsylvania Department of Welfare requirements or Federal law. The Commission denied PCOC's challenge to Columbia's CAP Plus, and PCOC appealed the matter to the Pennsylvania Commonwealth Court. On April 10, 2014, the Commonwealth Court affirmed the Commission's decision approving Columbia's CAP Plus program.

On September 28, 2012, Columbia filed a base rate proceeding under Docket No. R-2012-2321748. In 2013, the parties to that proceeding submitted a partial settlement for the Commission's approval, which featured an increase in LIURP funding from \$4,000,000 to \$4,500,000 and the cancellation of Columbia's agreement with Citizen's

Energy Corporation which had generated \$375,000 for Columbia's Fuel Fund, but which was only being recovered from Columbia's Purchased Gas Cost residential customers. The settlement provided for replacement of the proceeds of the Citizens Energy transaction with a \$375,000 increase to the Rider Universal Service Plan ("USP").

On March 21, 2014, Columbia filed a base rate proceeding under Docket No. R-2014-2406274. In December 2014, the Commission approved a settlement which included an increase in LIURP funding from \$4,500,000 to \$4,750,000.

On June 27, 2014, the Commission issued a Secretarial Letter to all energy utilities establishing a revised USECP filing schedule. As part of the new filing schedule, Columbia's then-pending proposed USECP for the plan period 2015 through 2017 would extend to include 2018. On January 16, 2015, Columbia filed and served an amended proposed USECP for 2015 through 2018. The Commission approved Columbia's amended plan for the years 2015 through 2018 on July 8, 2015.

On March 19, 2015, Columbia filed a base rate proceeding under Docket No. R- 2015-2468056. The Commission approved a settlement provision which allowed CAP's third-party administrative costs to be recovered through the Rider USP and the establishment of a Universal Service Advisory Council ("USAC").

In March 2016, Columbia filed a base rate proceeding under Docket No. R-2016-2529660. The parties agreed to allow Columbia to use the residential portion of federal pipeline credits and refunds collected by Columbia to fund the Hardship Fund. Columbia also agreed to continue to develop plans to increase donations to the Dollar Energy Fund in conjunction with its USAC. Further, Columbia agreed to report on any and all fundraising efforts as a part of the settlement. In addition, Columbia agreed to offset the Universal Service Rider by 7.5% for each customer enrolled over the average annual participation level of 23,000. The offset reflects anticipated savings in operation and maintenance costs gained when a customer participates in CAP.

On February 28, 2018, Columbia filed a petition under Docket No. P-2018-3000160 seeking approval to use federal pipeline penalty credits and refunds to permanently support its residential Hardship Fund. On June 14, 2018, the Commission approved Columbia's petition authorizing Columbia to use federal pipeline penalty credits and refunds to fund its Hardship Fund. Further, the Commission's order allows Columbia to maintain a Hardship Fund balance of up to \$750,000. If Columbia's penalty credit and refund balance is more than \$750,000, Columbia will flow the residential portion of the excess credit and refund balance to its residential customers. Columbia will continue to seek opportunities to raise funds to support its Hardship Fund. These provisions were added to Columbia's 2019-2023 USECP in the compliance filing of November 25, 2019.

In March 2018, Columbia filed a base rate proceeding under Docket No. R-2018-2647577. The Commission approved a partial settlement, which included a provision for increased LIURP funding by \$125,000 beginning in the year 2020. Any unspent funds at the end of the year will be rolled over and added to the LIURP budget for the following

year. Additionally, Columbia agreed to design and implement a process for electronic income verification for the CAP program by January 2020. Further, Columbia and the other parties agreed to discuss issues, including but not limited to, budget billing plans, high CAP credits and CAP payment plan options within Columbia's USAC. These provisions were added to Columbia's 2019-2023 USECP in the compliance filing of November 25, 2019.

By Order dated August 8, 2019, the Commission approved Columbia's USECP plan for 2019 – 2021 and directed certain changes, including the following:

- Include language that customers do not have to apply for LIHEAP as a condition of CAP eligibility.
- Define "household income" as it specifically relates to CAP Eligibility Criteria;
- Require verification of income at a minimum of every three years for customers that receive LIHEAP, Dollar Energy Fund ("DEF") or another Columbia universal service program;
- Reverify customers' reporting zero income every six months;
- Clarify that a mail-in application for CAP is available and acceptable in addition to telephonic and in person applications;
- Implement an online CAP application that also permits electronic submission of documentation no later than December 1, 2020;
- Eliminate any requirement for in-person CAP applications;
- Explain and clarify how the Remedial Energy Efficiency Program ("REEP") contractors formulate their program recommendations;
- Define "extenuating circumstances" as it relates to customers voluntarily leaving CAP and being able to re-enroll before the one-year stay-out provision expires. Clarify that a former CAP customer with no outstanding arrears that requests re-enrollment will be allowed back into CAP subject to CAP eligibility and enrollment requirements.
- Customers re-enrolling in CAP after four years are treated as never having been in CAP;
- Senior CAP payment plan is eliminated.
- Clarify that the cost of natural gas is not factored into Columbia's CAP or LIURP shortfall;
- Clarify that a \$500 DEF grant, regardless of balance owed, will be accepted as sufficient to end a termination or to restore service;
- Include the supplemental explanation of how the Universal Service Rider offset is calculated;
- Identify Community Based Organizations that provide LIURP weatherization services;
- Implement Inoperable Heating Systems Pilot as part of the Company's LIURP program; and

- Implementation of a Health & Safety Pilot as part of the Company's LIURP program.

On August 23, 2019, Columbia filed a Petition for Reconsideration of the online CAP application requirement and the requirement that CAP customers participate in LIHEAP. On November 14, 2019, the PUC granted the Petition in part and denied it in part. The PUC denied the Petition with regard to the online CAP application. The PUC granted the Petition with regard to the LIHEAP participation requirement and provided clarification thereof.

Consistent with the PUC's August 8 and November 14, 2019, Orders, Columbia filed its Revised USECP 2019-2021 Plan on November 25, 2019. By Order dated January 16, 2020, the Commission approved the November 25, 2019 Revised Compliance Filing.

Pursuant to the PUC Order of October 3, 2019, at Docket No. M-2019-3012601, on January 6, 2020, Columbia filed updated USP enrollment and budget projections for 2022 and 2023. By Order dated January 16, 2020, the PUC determined that Columbia's 2019-2021 USECP could be effective through 2023 and updated the caption accordingly.

In March 2021, Columbia filed a base rate proceeding under Docket No. R-2021-3024296. The Commission approved a settlement on December 16, 2021, which included the following provisions related to universal service:

- Expand the Emergency Repair Fund from \$600,000 to \$700,000 per year for years 2022 and 2023;
- Develop remedies for CAP exits relating to the failure to recertify and report to BCS the affirmative steps taken to reduce the exits for failure to recertify within 60 days of the PUC's order approving the settlement. The report was provided to BCS on February 14, 2022;
- Target Outreach and Case Management Pilot to promote existing programs and resources to customers below 50% of the federal poverty level and not enrolled in USP programs. The Company was permitted to recover the cost of the Pilot through Rider USP not to exceed \$200,000. This Pilot was implemented for the duration of 2022;
- Increase funding for the Health & Safety Pilot from \$200,000 to \$400,000 in 2022 and extend the Pilot until the approval of the Company's next USECP, with a maximum budget of \$600,000 per year if homes are available and in need of the Pilot services. The Company will modify the formula to include savings associated with CAP credits;
- The Company increased the LIURP budget by \$200,000 for a current annual budget of \$5,075,000;
- With regard to the carryover LIURP funding from 2020, the Company will canvas participating Community Based Organizations ("CBOs") to determine if they have capacity to do additional work and increase LIURP allocations to affirmatively responding CBOs who are on track to meet their existing allocations;
- Amend tariff to indicate that all "confirmed low-income customers" as reported in the PUC's Universal Service Report ("USR") with income at or below 150% FPL

will not be charged a security deposit and refund all deposits being held for “confirmed low-income customers” as reported in the PUC’s USR within 60 days; and

- Review security deposits on a semi-annual basis and issue a bill credit or refund for any security deposit previously collected from a confirmed low-income customer.
  
- In March 2022, Columbia filed a base rate proceeding under Docket No. R-2022-3031211. The Commission approved a partial settlement on December 8, 2022, with the following provisions regarding universal service: Spread any remaining LIURP balance from 2022 evenly over the years 2023, 2024 and 2025;
  - LIURP will be increased from \$5,075,000 to \$5,425,000 in beginning in January 2024 or sooner if carryover results in a year’s annual budget being less than \$5,425,000. The LIURP budget will remain at \$5,075,000 until the increase takes effect. The Company will expend the 2022 LIURP budget carryover before adjusting the Rider USP for the increase;
  - The Company will continue to partner with CBOs in the development, implementation and administration of its LIURP.
  
- A one-time donation of \$75,000 was made by shareholders to the Company’s Hardship Fund for the 2022 -2023 program year;
  
- The Company will conduct quarterly reviews of all CAP accounts to ensure the customers are getting the lowest CAP rate available to them. By December 31, 2023, Columbia will implement an automated process to conduct this quarterly review. IT costs related to the automation process will be recovered through Rider USP. By July 30, 2023, the Company will file a progress report explaining its progress toward implementing the automated process; and

## Program Evolution

The Company endeavors to react proactively to external factors and to improve efficiencies and processes. The chart below itemizes the program updates highlighted above, as well as temporary modifications in response to the COVID-19 pandemic.

Date Implemented	Customer Assistance Referral and Evaluation Services (CARES)	Low Income Usage Reduction Program (LIURP)	Hardship Funds	Customer Assistance Program (CAP)
2/1/2020				Paper Application Offered

4/1/2020	New CARES rep focusing on Outreach. Change in staffing from One US liaison and two EA Specialists to three EA Specialists to help with call volume in peak LIHEAP season			
4/1/2020	Development & review of Outreach Plan with USAC	Stopped removing customers from CAP for failing to cooperate with LIURP - COVID response		Stopped removing customers from CAP for failing to verify income until April 2022 - COVID response
7/1/2020	Wellness calls to elderly, living alone - COVID response	Health & Safety Pilot Initiated		Removed requirement to provide income to enroll in CAP - COVID response
10/1/2020			Opened enrollment to active CAP customers - COVID response	
10/1/2020	First annual Virtual Town hall for legislative office and CBO personnel to educate on all available resources & programs			
12/1/2020			Expanded hardship Fund guidelines to 300% and increased shareholder contribution by \$400,000 - COVID Response	
12/30/2020			On-Line Application went live	On- Line Application went live
2/1/2021	First of a now annual email to CRISIS eligible recipients that only require a positive response to apply for CRISIS on their behalf was sent			
4/1/2021				Revised re-entry process to start CAP customers over if out for more than 4 years. No CAP catch up amount required
10/28/2021	Shared & revised outreach plan based on feedback at USAC			

10/1/2021	Disseminated information to eight school districts to promote programs based on feedback from USAC outreach plan review			
1/1/2022		Increase LIURP by \$200,000		
1/1/2022		Expand Health & Safety Pilot to increase eligible pool and maximum H & S allocation		
2/1/2022				Began accepting income via email
4/1/2022	Increased outreach campaign using digital and TV ads to promote programs. Run in April and 4th Qtr			Pilot case management to enroll customers 0 - 50 % FPIG in CAP & accompanying outreach efforts.
4/1/2022				Zero Income reverification changed to every 6 months and reverification if only LIHEAP every 3 years
6/1/2022				Off cycle review of CAP accts to lower pp's due to higher budget calculations
11/1/2022				Developed partnership with state immigration office/local agencies to facilitate service connection and enter clients into CAP
1/1/2023		Spread remaining LIURP funds resulting from Covid underspend over three years, (2023, 2024 & 2025) with a minimum spend of \$5,425,000		
12/30/2022			One time \$75,000 donation to Hardship Funds	
2/15/2023		Updated letters to assist Spanish Speaking customers providing a direct line		
12/30/2023				Automate Quarterly reviews of CAP accounts to determine and execute on lowest payment option

## **Modifications to the Plan for 2024 - 2028**

- I. Staff shifting to improve efficiencies of the LIHEAP team and to provide more emphasis on grassroots outreach, as more fully explained below.
- II. Customer Assistance Program Changes
  - Establish updated payment plan options to align with the energy burden updates in the 2020 CAP Policy Statement docketed at M-2019-3012599;
  - Remove “payment-troubled” CAP qualification criteria to align with the 2020 CAP Policy Statement;
  - Cease charging co pays and CAP plus for all customers.
  - Update the reverification schedule as outlined in the 2020 CAP policy statement.
    - CAP households reporting no income will be required to recertify every six (6) months regardless of LIHEAP participation;
    - CAP households with income that participate in LIHEAP annually will be required to recertify once every three (3) years;
    - CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions will be required to recertify every three (3) years; and
    - All other CAP households will be required to recertify every two (2) years.
  - Quarterly review of all CAP accounts with automatic selection to lowest payment option available for which the customer is eligible;
  - Eliminate CAP aggregation for supply of gas due to lack of interest by suppliers;
  - Eliminate Remedial Energy Efficiency Program; and
  - Provide energy efficiency tips and survey to be completed by all CAP customers with shortfall over \$1500 annually to determine reason for high usage.
  - Modify the Customer Agreement form. See Attachment B
- III. LIURP Changes
  - Increase Health & Safety spending on every home from \$650 maximum to \$1,200 due to higher costs of materials and labor; and
  - Terminate the Inoperable Heating Systems Pilot due to lack of use.

## **Integration**

Columbia continues to use an integrated approach for outreach and solicitation for all Universal Service programs, focusing on two primary strategies: first, Columbia incorporates referrals into existing processes, and second, Columbia coordinates services with dedicated staff.

Columbia uses existing customer services processes, such as the Cold Weather Survey, collection, compliance, energy assistance receipts, grass roots outreach, social media and other marketing campaigns and contact management to create opportunities to increase enrollment in Universal Service programs.

All of Columbia's Contact Center staff are dedicated to the promotion of and enrollment in Universal Service programs. Customers are referred to all available and appropriate programs including, but not limited to, CAP, LIURP, CARES, energy assistance, hardship funds. In addition, Columbia's trained representatives refer eligible customers to non-utility assistance programs such as earned income credits, food banks and community-based agencies including 211.

When a customer is identified as payment-troubled or low income during a contact with the Company, the customer is notified of all available programs. The customer can also be pre-screened for the CAP program and immediately transferred to Columbia's third-party administrator for CAP enrollment. This "one-stop-shop" approach is administratively efficient because it identifies which programs are appropriate for the customer at the initial, single point of contact.

Columbia prioritizes CAP customers for LIURP benefits to reduce future consumption and shortfall. This coordination occurs at the time of referral at the Contact Center. As a result, only one application is needed to apply for both CAP and LIURP.

Columbia reviews all CAP customers with more than \$1,000 in annual shortfall for LIURP at the beginning of each year. Throughout the year, newly enrolled CAP customers are also screened for LIURP.

All customers referred to or requesting Emergency Repair Program ("ERP") funds, Audits and Rebates program benefits or LIURP benefits are screened to determine the program that can provide the highest level of benefit. Staff notify the customer and the appropriate program staff at the same time to guarantee the highest benefit level and quickest response. In addition, this approach allows Columbia to increase LIURP enrollment while reducing costs to the ERP and Audits and Rebates Program, which have lower funding levels. Further, customers participating in the Audits and Rebates Program are automatically considered for the ERP if the customer is need of repairs covered under the ERP.

LIURP contractors are encouraged to leverage county and other utility program funding on all completions. The coordination of LIURP programs provides a seamless experience for the customer while maximizing benefits.

CAP staff, LIURP staff as well as LIURP contractors contact the CARES department directly for all cases needing one-on-one intervention and/or Spanish translation.

## Outreach

Columbia promotes its Universal Service programs and engages in external outreach opportunities throughout its service territory. Since 2020, Columbia has reviewed its outreach strategy and efforts with its USAC at every meeting. The USAC has helped to expand opportunities for the Company to explore. Please see the Attachment D for the outreach and education plan. This plan reflects an evolving process that will be modified and enhanced as needed within the duration of the 2024 USECP.

## Staffing

Columbia utilizes the resources of staff employees along with the experts of community partners to implement all of its Universal Service programs.

## **Universal Service Program Responsibilities**

Director, Rates and Regulatory Affairs	Strategic direction of all programs/policies
Manager, Universal Service	Implementation/compliance of all programs
Program Administrator	Program reporting for all programs
Coordinator Customer/Community Outreach and Education (2)	Grass roots outreach for all programs One-on-one case management for vulnerable and special needs customers
Columbia Customer Contact Center	Provision of information on, referrals to and enrollment in all programs
Energy Assistance Team Leader	Day-to-day compliance of LIHEAP vendor agreements, reconciliation of LIHEAP receipts
Energy Assistance Specialist (3)	LIHEAP hotline response, customer payment postings and response to customer inquiries Coordination of Fuel Fund and CAP processes and agencies for grants and applications
Quality Assurance Coordinator	Implementation of LIURP quality assurance program and daily troubleshooting
Weatherization Specialist	Coordination of LIURP process flow from referral through completion to post inspection

## **Community Partnerships**

Columbia partners with community organizations for both the delivery of universal service programs and feedback on program practices and policies.

<b>CAP</b>	
Columbia	Management
Columbia Customer Care Center	Information, referral and customer inquiry
Dollar Energy Fund, Inc.	Outreach and intake administration
Dollar Energy Screening Agencies	On-site applications and referrals
Individual Contractor	Energy efficiency/consumer education and quality assurance control
<b>LIURP</b>	
Columbia	Management, pre-screening, referrals and Quality Assurance
Columbia Customer Care Center	Information, referral and customer inquiry
11 Weatherization providers throughout Columbia's service territory (current list as of January 2023 subject to change) Not For Profit/CBO's <ul style="list-style-type: none"> <li>• South Central Community Action Agency</li> <li>• Community Action Partnership for Somerset County</li> <li>• Housing Authority of the County of Beaver</li> <li>• Action Housing</li> <li>• The Weatherization program of Fayette County</li> <li>• Lawrence County Community Action</li> </ul> For Profit Organizations <ul style="list-style-type: none"> <li>• Clearesult</li> <li>• Mincin Insulation</li> <li>• MT Tenny</li> <li>• Fitzsimmons Energy Auditing</li> <li>• Grindle Insulation</li> </ul>	Weatherization, customer communication and data tracking
Rebuilding Together Pittsburgh	Energy efficiency education/inspections
King Conservation Group	Energy efficiency education/inspections
<b>HARDSHIP FUNDS</b>	
Columbia	Management, enrollment and referral

Customer Care Center	Information and referral
Dollar Energy Fund, Inc.	Outreach and intake administration
Dollar Energy Fund Screening Agencies	Outreach and intake implementation
<b>CARES</b>	
Columbia	Management
Columbia Customer Care Center	Information, referral and customer inquiry
Community-based Organizations	Resource development

The list below reflects the positions held by Columbia's Universal Service team on various task forces, committees and boards within the communities that Columbia serves.

<u>Task Force, Committee or Board</u>	<u>Position</u>
Be Utility Wise (SW PA)	Member/Sponsor
Fayette County Human Service Council	Vice President
Beaver County Homeless/Housing Coalition	Member
Department of Community and Economic Development Weatherization Assistance Program Policy Advisory Council	Member
York County Hispanic Coalition	Member
Children's Aid Society	Member
Lehman Center	Member
Volunteer Center, United Way of York County	Team Member
Project Destiny Inc/Thrive 18 Resource Group	Member
Local Housing Options Team (LHOT), Multiple counties	Member
Big Brothers/Big Sisters Laurel Region	Fayette Recruiting Committee
Communities that Care Multi County	Member
MAGIC Greene County Human Service Council	Member
Council of Community Services	Member

## Budgets

Universal Service expenses are monitored and tracked specifically by each program with the exception of Hardship Funds. Because oversight of the Hardship Funds resides within the CARES program, all internal administrative expenses are included in the CARES budget.

	2024	2025	2026	2027	2028
<b>LIURP*</b>	<b>\$5,893,673</b>	<b>\$5,893,673</b>	<b>\$5,425,000</b>	<b>\$5,425,000</b>	<b>\$5,425,000</b>
<b>Emergency Repair Program*</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>
Energy Assistance Outreach and Processing	\$180,000	\$185,000	\$185,000	\$190,000	\$190,000
CARES Community Outreach	\$285,000	\$285,000	\$290,000	\$290,000	\$300,000
<b>CARES Total - Costs recovered through base rates</b>	<b>\$465,000</b>	<b>\$465,000</b>	<b>\$475,000</b>	<b>\$480,000</b>	<b>\$490,000</b>
CAP Administration and Applications**	\$760,000	\$800,000	\$810,000	\$820,000	\$830,000
Shortfall*	\$26,626,814	\$30,550,951	\$32,079,008	\$33,682,845	\$35,062,734
Arrearage Retirement*	\$3,682,580	\$4,274,414	\$4,671,232	\$4,627,260	\$4,473,358
<b>CAP Total</b>	<b>\$31,069,394</b>	<b>\$35,625,365</b>	<b>\$37,560,240</b>	<b>\$39,130,105</b>	<b>\$40,366,092</b>
<b>Hardship Funds</b>	<b>\$675,000</b>	<b>\$300,000</b>	<b>\$300,000</b>	<b>\$300,000</b>	<b>\$300,000</b>
<b>Hardship Administrative Costs</b>	<b>\$74,250</b>	<b>\$31,000</b>	<b>\$31,000</b>	<b>\$31,000</b>	<b>\$31,000</b>
<b>Total</b>	<b>\$39,177,317</b>	<b>\$43,315,038</b>	<b>\$44,791,240</b>	<b>\$46,366,105</b>	<b>\$47,612,092</b>
<b>Number of Residential Customers</b>	409,800	409,800	409,800	409,800	409,800
<b>Average Spending per Customer per month</b>	\$8.45	\$9.35	\$9.66	\$10.00	\$10.27

\* All costs recovered through Company's RIDER USP

\*\*all costs recovered through Companys' RIDER USP except internal labor

## **Universal Service Plan (USP) Rider Offset**

Columbia provides an offset to its USP Rider of 7.5% for each customer enrolled in CAP over the annual participation level of 23,000. This offset (*i.e.*, credit) will be calculated in

the following manner on a yearly basis:

- Sum the Total annual shortfall plus Total Annual Arrearage Forgiveness and divide by total number of customers in CAP to arrive at a per customer CAP cost.
- Multiply 23,000 by per customer CAP cost to determine 100% recovery for first 23,000 CAP customers.
- Subtract the 100% recovery from the sum of Total annual shortfall and Total annual arrearage forgiveness to determine the portion that should be offset.
- Multiply the portion to be offset by 7.5%. This equals the dollar amount not collected through the Rider as an offset.

## **Program Descriptions**

Pursuant to 52 Pa. Code § 62.4(b), the components of Columbia's Universal Service and Energy Conservation Plan are described in detail. The following are program descriptions, including eligibility criteria, needs assessments, and projected enrollment levels for the programs.

### **CARES (Customer Assistance Referral and Evaluation Services)**

#### **Scope**

CARES provides information and referrals on all programs and resources available to customers in need to the Customer Service Representatives at the Company's customer Contact Center. The CARES program also interacts with customers one-on-one to assist with payment troubles and hardships. CARES has been offered to Columbia customers since 1986. Since its inception, over 48,000 customers have received the assistance of staff social workers through resource referrals, consumer education, LIHEAP Outreach and affordable payment plans tailored to the customer's ability to pay. CARES is designed to be a short-term program for first-time payment-troubled customers who require energy assistance and other necessary resources and referrals.

In addition, CARES assists vulnerable CAP customers who need extra protection and account monitoring. It is also the final step in the Cold Weather Survey intervention process. Columbia's Customer/Community Outreach and Education Coordinators ("Coordinators") make additional attempts to contact customers aged sixty-two and over who are without heat. This intervention is continuous throughout the heating season.

Coordinators also oversee the handling and processing of all accounts protected under regulations governing customers with valid Protection from Abuse (“PFA”) orders.

The coordinators train Contact Center and service employees on available resources.

## **Key Objectives**

- Safe, sustained energy
- Customer self-sufficiency
- Resource development
- Successful payment recovery
- Continuous payment frequency
- Reduced credit/collection costs
- Identification and cost avoidance associated with crisis/safety issues
- Customer satisfaction
- Crisis intervention
- Reduced Commission complaints
- Community networking
- Goodwill

## **Eligibility Criteria**

CARES is designed to be a short-term or temporary program for residential-heat customers who must demonstrate one of the following scenarios:

- Payment-troubled customer, evidenced by missed payments or anticipated payment barriers due to a personal crisis that is likely to result in a financial hardship, i.e. situations involving medical, financial, employment, familial or psycho-social issues.
- Special-needs customer, evidenced by the onset of a crisis having a profound impact on an individual or family, i.e. sudden loss of income, divorce, major life-threatening illness, death of the wage earner, or service emergency during harsh weather.
- Vulnerable customer, defined as someone who possesses impaired intellect or mental health, extreme physical disability, or chronic mismanagement of finances that has the serious potential to interfere with good payment behavior. These vulnerable customers will have diminished capacity to take care of basic needs, make reasonably sound decisions, take responsibility for their own personal safety, or have barriers for communications with the outside world.
- Domestic abuse customer, with a valid and active PFA court order, who is trying to obtain or maintain gas service.
- Cold Weather Survey customer, aged sixty-two or older, who is without their regular gas service and is using space heaters such as kerosene, wood, coal, or electric.

## **Program Components**

- Case management approach to solving individual payment problems
- Home visit assessment when necessary
- Protection from service termination during program
- Short-term, affordable payment plans based on ability to pay and case specific options designed by the coordinators for each specific customer
- Budget counseling
- Referrals and linkage to community, state, and federal resources for direct and indirect monetary assistance
- Application processing as necessary
- Information dissemination and referrals
- Crisis intervention
- Oversight of accounts with active PFA orders

## **Victims of Domestic Abuse Policy**

The Company will accept a PFA order, or a court order issued by “a court of competent jurisdiction” in Pennsylvania that provides evidence of domestic violence. Columbia has a fax number and an email address that is only accessible by five of its employees for customers to submit PFAs or such court orders. When the Company receives a PFA or court order, the document is uploaded to a secure, password protected file on the Company’s server. Once a PFA or court order is received via the above process, the O&E Coordinator is notified that a new file has been uploaded to the secure server. The O&E Coordinator then follows up with the customer if additional information is needed, determines assistance, and monitors the customer’s account until the order expires.

## **LIURP (Low Income Usage Reduction Program)**

### **Scope**

Columbia has provided assistance to eligible households through its Low-Income Usage Reduction Program since 1988. Approximately 12,000 homes have been weatherized since that time. Consumption savings average between 20%-24%. Average 2022 program expenditure per home was \$11,488.95. In accordance with existing requirements, each measure installed is projected to have a 7-12 year payback.

### **Key Objectives**

- Safe, affordable energy for low-income customers
- Reduced uncollectible arrearages and write-offs

- Reduced consumption
- Affordable budgets/bills for customers
- Reduced CAP shortfall deficit through bill reduction
- Improved customer satisfaction
- Environmental awareness/protection
- Responsible energy use
- Improved quality of living

## **Eligibility Criteria**

- Columbia residential heating customer
- Customer must not have received full weatherization services in the past seven years at their current dwelling. Full weatherization services is defined by the Company as the installation of weatherization measures, excluding replacement/repair of heating systems, that would reasonably result in a minimum of 15% energy usage reduction from installed measures.
- Exceptions will be made to the seven-year criteria if a customer's usage is still over the minimum usage requirements (set forth below) after weatherization and if new measures can be installed that will reduce energy usage.
- 52 Pa. Code § 58.2 (relating to definitions) including non-CAP, low-income customers who otherwise meet the LIURP eligibility requirements.
- Homeowner or renter; renter must have property owner permission including a signed release.
- Average winter monthly consumption greater than 170 Therms.
- Waiver of consumption requirement for coordinated jobs with electric or county programs.
- Dwelling must be approved during audit to be in proper condition to weatherize and screened for Health & Safety pilot if obstacles exist.
- A premises may be disqualified or deferred if Columbia makes a determination that providing weatherization services would not meet the seven-to-twelve-year payback as in as defined in 52 Pa. Code Section §58.11.
- Customer must be at or below 150% of federal poverty guidelines.
- Up to 20% of annual budget eligible for special needs customers as defined in 52 Pa. Code Section § 58.2 (relating to definitions), including non-CAP customers who otherwise meet the LIURP eligibility requirements.

## **Program Components**

- Home Energy Audit. Each eligible home is audited to determine if the dwelling is in proper condition for weatherization. Weatherization measures are recommended at the time of the audit. Referrals to other housing development agencies for repair work are made, if necessary. Referrals to other utility weatherization programs are made, as necessary.
- Energy education provided concurrent with audit.
- Coordination with other utilities and weatherization programs to leverage funds and

increase customer satisfaction.

- Heating system is inspected, tuned and repaired as needed prior to weatherization treatment.
- Gas furnace may be upgraded to 95% efficiency or higher if deemed to be inefficient.
- Gas boiler systems may be upgraded to 85% efficiency or higher if deemed to be inefficient.
- Health and Safety allowance, defined as any measure necessary to make the heating system safe and operable up to \$1200.00,
- Examples of additional health & safety measures are as follows: roof repairs, knob and tube remediation, remediation of a faulty bath fan, vermiculite testing, gutter repair or other repairs to eliminate moisture in the basement, dryer venting corrections, replacement of a broken window or broken lock on a door, repair of a step leading to the basement or attic, and removal of mold if the moisture source has been resolved. In every instance, the Company works with the contractor and approves all health and safety measures prior to installation, this may include exceeding the \$1,200 limit if it is necessary in order to make the property safe.
- Weatherization measures are performed specific to audit recommendations. Treatment is determined based on highest efficiency results. Measures include sidewall and attic insulation, blower door guided air sealing measures such as caulking, sealing and window stripping.
- Carbon Monoxide detectors are installed on each floor level of all completed homes.
- A copy of the signed landlord agreement will be provided to renters.
- Twenty-five percent of weatherized homes are inspected for quality and safety (“post inspection”) annually.
- Program is evaluated by comparing weather normalized pre-treatment usage to weather normalized post-treatment usage to determine savings.
- Contractors will be provided a list of customers that used more gas in the post period (weather normalized) to research and analyze what may have been the cause of the increased usage to help improve processes going forward.

### **Training & Contractor Qualifications**

The Company contracts with current DCED county weatherization providers and some for-profit companies. The Company accepts all DCED county weatherization provider training and requires Building Performance Institute qualifications for the other companies. As needed, the Company will hold a training meeting with all contractors to review Company procedures and to train on specific problem areas the Company is experiencing with multiple contractors or a new technology opportunity.

### **LIURP Post Inspection**

Columbia’s QA Coordinator oversees the quality control program. Current guidelines require 25% of each contractor’s work to receive a post-completion inspection. The QA Coordinator gets a listing of all jobs completed for the prior month and sends all jobs to the external post-completion inspectors. Exceptions to this process include times when the QA Coordinator was at the home after the work was completed, there is a safety issue in the home, such as an aggressive dog, or only an HVAC measure was installed, such as a new furnace. The post-

completion inspectors are provided the number of post-completion inspections needed by contractor, and the inspectors send letters to all customers of the contractors, which still need post-completion inspections. The inspectors also make outbound calls to encourage customer cooperation with the inspections. The inspectors work diligently to obtain approval from customers for post-completion inspections and stop outreach when they achieve 25% post-completion inspections for each contractor's work.

## **Emergency Repair Program**

### **Scope**

ERP provides services for eligible property owners who are without heat due to a gas line leak, water tank issue or inoperable heating system. Qualified participants will receive repair or replacement of faulty heating equipment, hot water tanks and/or gas lines. The program is for emergencies only and not intended to assist new homeowners with existing, known faulty equipment.

### **Eligibility Criteria**

- Request for services must be initiated by the property owner
- Income at or below 150% of the FPIG
- Up to 10% of the program budget can be used to assist customers between 151% and 200% of FPIG; and
- Must be an emergency situation and not have received ERP services for the same equipment within the last three years unless asserting an issue with the prior installation or equipment.

### **Program Components**

Income eligible homeowners who contact Columbia's CCC are screened for program benefits by Columbia CSRs. Customers are also referred through Columbia's Operations and Construction Departments and Community Based Organizations. The referral is made to a third-party administrator for follow-up within two hours. In most cases, income documentation is verified by existing documentation provided by LIHEAP, CAP, or other program enrollment. Household ownership is confirmed via county property search websites. Once eligibility is verified, the administrator contacts one of the program's partnering heating, ventilation and air conditioning contractors or plumbing contractors. With customer cooperation, emergencies are resolved within 24 hours during the winter months and initiated no later than the next business day in non-winter months.

### **Health and Safety Pilot**

The Health and Safety Pilot began in January 2021.

### **Key Objectives**

- To decrease the number of deferred jobs due to conditions in the home such as knob and tube wiring, moisture in basement due to leaky roofs, and other minor structural issues.

- To reduce usage in CAP customers' homes that could not be weatherized without remediating identified Health and Safety issues.

### **Eligibility**

- Must be an active CAP Customer with shortfall greater than \$1,000 per year average.
- Customer must own and reside in dwelling for a minimum of six months.
- Prior annual usage must be greater than 1600 therms or 250 average therms per winter months.
- A present Health and Safety issue that is preventing weatherization including, but not limited to, knob and tube wiring, presence of moisture, mold or mildew.
- The elimination of the Health and Safety issue will result in comprehensive measure installation and expected usage reductions greater than 18%.

### **Program Components**

- Additional Health and Safety spend will be authorized based on the following model, scenarios 2 through 5. PDV stands for Present Discounted Value (of Savings).

Variable		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
User Entered Fields	Pre-Treatment Therms	1500	1600	2500	3800	5000
	Home Age	50	30	100	100	100
	Square Feet	1500	1250	2000	3200	3200
	Air seal + Insulation Cost	\$800	\$1,400	\$1,000	\$2,700	\$5,000
	Heat Sys Replace (yes=1)	0	0	1	1	1
	Duct Sealing (yes=1)	0	1	0	1	1
	Contractor 74	0	0	0	1	0
	Contractor 102	0	1	0	0	0
	Contractor 77	0	0	0	0	1
	Contractor 103	0	0	0	0	0
	Heat Sys Cost	0	\$0	\$3,500	\$3,500	\$3,500
Other Non H&S Costs	\$800	\$800	\$1,000	\$1,000	\$2,000	
Calc Fields (5% discount)	Annual Savings (Therms)	214	301	578	1075	1536
	Calculated % Savings	14%	19%	23%	28%	31%
	PDV Savings (Therms)	1897	2672	5126	9527	13615
	Max Spending	\$1,986	\$2,798	\$5,368	\$9,977	\$14,258
	Total Non H&S Costs	\$1,600	\$2,200	\$5,500	\$7,200	\$10,500
	H&S Allowance	\$386	\$598	-\$132	\$2,777	\$3,758
Calc	12-Year Savings (Therms)	2568	3618	6940	12898	18434

Fields (no discount)	Max Spending	\$2,689	\$3,789	\$7,267	\$13,507	\$19,305
	H&S Allowance	\$1,089	\$1,589	\$1,767	\$6,307	\$8,805

- Pilot participants will be tracked separately for evaluation purposes.
- The Pilot’s success and cost-effectiveness will be measured similarly to LIURP.
- All other traditional components of LIURP will be maintained.

**Projected Enrollment**

- A maximum of \$400,000 in additional Health and Safety costs may be spent per year for this Pilot.
- Estimate of participants is 30 homes per year.

**HARDSHIP FUND**

**Scope**

Columbia contributes one dollar of shareholder money for every dollar contributed by its customers. Annually, Columbia raises \$75,000 to \$80,000 in customer contributions through bill solicitation. In addition, Columbia sponsors fundraising activities to increase customer contributions up to \$150,000. Combined with a shareholder match, this total of \$300,000 is available to payment-troubled, low-income customers for assistance with their Columbia bill. Opening and closing dates for the availability of funds are determined annually.

Additionally, the Commission has approved Columbia’s request to direct pipeline refunds and penalty credits received by Columbia to the Dollar Energy Fund to supplement these efforts as detailed above in the Historic Overview section. As of February 2023, there is \$375,000 remaining in pipeline refunds and penalty credits.

Approximately ten percent of awarded grant dollars are earmarked for administration. This money is paid to the administrator, Dollar Energy Fund, for the outreach and intake application process in the community. Currently, 92 community-based organizations take applications within communities that Columbia serves.

**Key Objectives**

- Prevent termination.
- Restore service.
- Reduce outstanding balances.

**Eligibility Criteria**

- Columbia residential heating customer.
- Household income at or below 200% of Federal Poverty Level.
- Must have exhausted all other available energy assistance resources.
- Minimum arrearage balance of \$100.00. for those under age 62.
- Demonstrated sincere payment effort of \$150.00. or \$100.00 for customers over 61 years of age
- Service Status Criteria
  - October, November and February, the program only assists customers without natural gas service or who are in threat of termination.
  - December, the program is only open to those without service.
  - In the remaining months, the program is open to all non-CAP customers while funds are available.
- Exceptions to eligibility criteria may be granted under special circumstances, which may include not requiring a sincere effort of payment, minimum arrearage balance, or CAP status.

### **Treatment of CAP Customers**

Columbia only allows Hardship Funds to be applied to CAP accounts when a customer is without service for non-payment during the months of October, November or December (cold weather procedure) or if the customer has been out of the program for more than one year. At that time, Columbia will allow the Hardship Fund grant to substitute for a customer payment for the purpose of re-instatement into CAP. CAP customers receive arrearage forgiveness and CAP credits that are, on average, higher than the maximum hardship fund grant. In an effort to ensure there is some assistance available for all customers that need help, Hardship Fund grants are limited for CAP customers. If funding is available in mid-May, the Company will open the program to active CAP customers.

### **Program Components**

- Screening and referrals at Columbia's Customer Care Center.
- Customers can apply in person at local screening agencies, over the telephone, or online. If a customer self declares difficulty with any of these options, a referral is made to the Company's O & E Coordinator. The Coordinator can take applications over the telephone and can provide tailored assistance to ensure a complete application. Spanish speaking customers can apply in person at an agency, over the phone or with assistance from the coordinator.
- Grant determination by Columbia employees for customers without service to expedite reconnections.
- Grant amounts do not exceed \$500 per customer. A grant of \$500, regardless of the balance owed, will be accepted as sufficient to end a termination or to restore service.

### **Fundraising**

- Columbia participates in Dollar Energy Fund-organized fundraisers with partial proceeds going to match Columbia’s shareholder match. These efforts include:
  - WarmAThon – radio call-in fundraiser - Columbia assists in staffing phone lines and sponsors event;
  - Cool Down for Warmth; – Volunteers stay in a house made of ice and ask for donations to the Dollar Energy Fund in order to get out of the house.
  - Golf Outing – Columbia sponsors event and golf teams; and
  - Request-a-Thon – Radio call-in fundraiser.
- Columbia sponsors Company-specific events to raise funds for the Hardship Fund annually:
  - Email blasts to customers;
  - Social media promotions throughout the year on Facebook and Twitter.
  - Bill insert requesting donations;
  - Thank you letters to previous donors; and
  - Sponsorship of TransSiberian Orchestra concert where \$.50 of every ticket sold goes to the Dollar Energy Fund.

## **CAP (CUSTOMER ASSISTANCE PROGRAM)**

### **Scope**

Columbia’s CAP was first established as a pilot program in 1992, at which time participation was limited to 1,000 customers. Since then, Columbia’s CAP has expanded to its current active total of approximately 24,300 participants.

The program was created as an alternative to traditional credit and collection measures to assist long-term, payment-troubled customers by offering affordable payment options.

Under provisions of the 1999 Natural Gas Choice and Competition Act, Columbia filed a restructuring settlement agreement at Docket No. R-00994781, under which it expanded the CAP program from 1,000 to 22,000 customers. Through a subsequent settlement agreement approved by the Commission at Docket No. P-00032057, the enrollment limit of CAP was modified to 27,135. To date, Columbia’s CAP has not reached the enrollment ceiling. In 2015, the Company was directed to remove the enrollment ceiling.

### **Key Objectives**

- Provide affordable payment options;
- Reduce credit/collection costs;
- Reduce arrearage write-off;
- Administer an efficient, cost-effective program;
- Enhance customer understanding of program benefits;
- Increased “on time” payment frequency;
- Minimize shortfall through energy efficiency programs;

- Target identification of low-income, payment-troubled customers; and
- Reduce Commission complaints.

## **Eligibility Criteria**

- Columbia residential heating customer;
- Household income at or below 150% of Federal Poverty Level. Household income is defined as all earned and unearned income from household members age 18 and over and excluding earned and unearned income for any members under the age of 18. Please see Attachment C for a list of acceptable documentation for various types of earned and unearned income. Please see Attachment D for a copy of the zero-income form used to verify customers that have no income. Must not reside in a multi-unit dwelling served by one meter; and
- Must provide proof of identity for all adults in the household by a Social Security number, driver’s license number or another state identification number. In addition, the Company will accept passports, temporary Social Security cards and alien ID numbers provided by a state refugee and immigration agency.

## **Program Components**

### **Administration**

- A Community Based Organization (“CBO”) performs clerical and administrative duties for portions of the CAP program. These functions include screening, enrollment, and re-verification.
- The Administrating Organization (the “Administrator”) networks with over 25 designated screening agencies/CBOs to complete on-site applications only when necessary. The Administrator also operates a phone enrollment process, an online enrollment process and paper applications.

Columbia’s CAP payment structure provides for the most affordable payment plan. The following options are available to accommodate differences in family size and usage:

Option #1:	Percentage of Income.		
	0 – 50% of FPL	=	4%
	51 – 150% of FPL	=	6%

Option #2		
	0 – 50% of FPL	50% of budget billing
	51 – 150% of FPL	75% of budget billing
	(Adjusted annually, with no true up charge)	

A minimum payment amount of twenty-five dollars is required.

Any payments made in excess of the monthly CAP bill are applied to future CAP bills.

The Administrator reviews the application verifies the applicant's eligibility, confirms the payment amount, and enters information into Columbia data systems. Columbia mails a confirmation letter to the customer.

With customer approval, the Administrator, the Dollar Energy Fund will use income received for a First Energy CAP application to verify eligibility for Columbia's CAP.

Columbia's CAP plans are designed to be the most affordable (lowest) payment plan offered by Columbia. If at any time a customer's CAP payment exceeds the tariff budget, the account is reviewed by an Energy Assistance Specialist to determine if the customer's payment should be lowered or if the customer should be removed from the CAP program.

The company will review all CAP accounts quarterly and will automatically enter the customer on the lowest option available. This is designed to ensure that customers who move from one address to another will continue to be provided the lowest CAP plan option at the new address.

## **Intake and Enrollment**

External studies support the use of telephonic applications with the intention of increasing customer ease, efficiency, and the number of applications completed while also decreasing administrative costs. While telephonic applications are encouraged, customers also have the option of applying for CAP during an on-site intake appointment at a community-based agency or by completing and submitting a CAP application through the mail or on-line.

Columbia's Customer Service Representatives coordinate referrals to the agencies and the Administrator for the intake and processing of CAP applications. All customers, regardless of intake type, are required to provide supporting documentation.

---

On-site applications are generally recommended, but not required, for reconnection of service, when a Hardship Fund application is also needed, or when a customer is considered vulnerable and needs assistance completing the application and providing documentation. A customer always has the option of an on-site intake appointment or to complete an application on-line or on paper.

A non-CAP customer or applicant without service who has a balance from a prior account is required to pay no more than \$150, apply for all available energy assistance programs and complete a CAP application to restore service and enroll in CAP.

A removed CAP customer who is without service may be required to pay no more than

\$300, apply for all available energy assistance programs, and complete a CAP application to re-enroll in CAP.

Any customer who is found to be, or found to have been, stealing gas will be charged separately from their CAP payment and required to pay full amount of theft prior to reconnection and re-enrollment.

The Company will charge no more than a prorated CAP bill for usage incurred during their final billing period.

### **Customer Responsibilities**

A CAP customer must agree to and uphold the following obligations:

- The initial application and subsequent re-application are subject to agreed-upon conditions, which serve as a contract between the customer and Columbia. See Attachment B.
- Income verification as required. Documentation can be for a minimum of thirty days to a maximum of one year, whichever provides the largest benefit to the customer. Documentation can be provided by mail, fax, e-mail, text or uploading documents via the administrator's secure website.
  - CAP households reporting no income will be required to recertify every six (6) months regardless of LIHEAP participation;
  - CAP households with income that participate in LIHEAP annually will be required to recertify once every three (3) years;
  - CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions will be required to recertify every three (3) years; and
  - All other CAP households will be required to recertify every two (2) years.
- The monthly payment amount must be paid by the due date.
- Since the current average CAP bill is \$58 and CAP is designed to ask for an affordable monthly payment regardless of the total bill amount, CAP customers are not eligible for Hardship Fund grants unless one of the following conditions exist:
  - The customer's service is off in October, November or December.
  - The customer has been out of CAP for one year.
  - The Company has funding available and opens to all CAP customers.
- The customer must accept any available free weatherization services offered through the Columbia's LIURP.
- Any customer with non-essential gas appliances such as a pool heater must agree not to use the device.

### **Usage Controls**

- CAP customers will be prioritized for LIURP if monthly usage averages over 170 Therms

during the winter months.

- CAP customers will be reviewed at the start of each year to identify all customers with more than \$1,500 shortfall in the prior year
  - Customers will be screened for Weatherization and if eligible, the Company will initiate the process with a letter advising the customer to contact the identified contractor to schedule an audit. The contractor identified in the Company's letter to the customer will also receive a letter from the Company that includes the customer's information and a request to schedule an audit directly with the customer.
  - All customers who are not eligible for weatherization will be provided information by mail or email on energy efficiency tips and resources
  - A survey will be sent to this subset of customers requesting information to determine whether the customer qualifies for an exemption due to usage beyond their control.

### **Transfer of Service**

A CAP customer who requests a transfer of service from one premises to another will have the CAP plan transferred with no interruption. The payment plan will be reviewed to ensure the customer is on the lowest payment option available.

For customers who opted to disconnect their service and then subsequently request service at a new address:

- If less than six months, the customer will need to request to be re-instated into CAP after connection of service. The customer is not required to re-verify income since it was less than six months.
- If more than six months, customer will need to complete a new CAP application and verify income.

### **Default Provisions**

A CAP participant can default from the program for non-compliance of program guidelines and customer responsibilities.

### **Default Provisions for Nonpayment of CAP Budgets**

*April 1 through October 31:* a CAP customer is in default after two missed CAP budget payments.

Columbia will issue a termination notice no sooner than 10 days after a customer fails to pay two CAP budget payments by the due date.

If a CAP customer does not make up all missed CAP payments within 10 days of the date of the termination notice, Columbia will attempt to terminate service for non-payment of

the CAP budget bill. Columbia, in its sole discretion, may delay termination in the event of extenuating circumstances.

To restore service, a CAP customer must pay all missed CAP budget payments that were the subject of termination as well as any missed CAP budget payments that became past due during the termination notice period.

To restore service, a customer that was removed from CAP more than four years from request of service, will be able to enroll in CAP as if he/she was never in CAP before. Any current arrears will be treated as a new pre- program balance.

*November 1 through March 31:* a CAP customer will not be removed from CAP for failing to make missed CAP payments. *Commencing February 1,* Columbia will issue termination notices to CAP customers who failed to pay CAP budget payments during the November to March period. The amount on the termination notice shall be for all missed CAP payments.

### **Default Provisions for Customers Requesting Removal from CAP**

A customer who requests removal from CAP will be sent a letter explaining the benefits of CAP, along with a return envelope. The customer will be required to sign and return the letter and upon Columbia's receipt of the executed letter, the customer will be removed from CAP.

The letter will confirm that the customer may not enroll in CAP for one year from the time of the customer's removal. The Company reserves the right to enroll a customer in CAP prior to one year after removal if extenuating circumstances exist. Most extenuating circumstances can be described as a hardship experienced by the customer after he/she left CAP such as a loss of income, deterioration of health of a household member or the death of a household member. A former CAP customer with no arrears that requests re-enrollment will be allowed back into CAP, subject to CAP eligibility and enrollment requirements.

### **Default Provisions for Customers with High Consumption**

A customer refusing weatherization through Columbia without demonstration of a legitimate exemption will be reviewed by Customer/Community Outreach coordinator.

A customer may be removed from CAP as a result of the review.

A customer who does not respond to multiple attempts for weatherization will be removed from the CAP program.

### **Re-connect Procedures**

Reconnection and subsequent re-instatement when the applicant's gas service had been terminated after removal from CAP less than four years prior:

- All missed CAP payments must be made, for each of the months during which gas service was retained.
- All payments made by the customer after removal from CAP will be deducted from the amount needed for program re-entry.
- Any charges incurred after the customer defaulted, which have not been paid by the customer, are treated as current bill shortfall amounts.
- An applicant will be required to re-apply, including providing proof of income, if the applicant has been without service for 6 months or more.
- These reconnect procedures also apply to defaulted CAP customers who move to a new address after termination for non-payment.

### **Security Deposits**

- CAP customers are not charged security deposits.
- The Company will continue its practice of reviewing any accounts newly self-identifying as level 1 and refund any security deposits at that time in compliance with Chapter 14 guidelines.
- Any paid security deposits on accounts with an approved CAP application will be refunded to the customer prior to entry into CAP.
- Past due security deposits from customers entering into CAP will be waived after income verification is complete.

### **Reconnection fees & Late fees**

- All reconnection fees will be waived for customers who are successfully enrolled in CAP.
- No late fees will be charged to active CAP customers.

### **Re-instatement**

Re-instatement when the customer retained gas service after removal from CAP less than four years prior:

- The customer must pay the entire balance of missed CAP payments.
- Any payments made by the customer after removal are deducted from the amount needed for program re-entry. A customer must resolve any outstanding issues related to removal from CAP, such as verifying current income or accepting free weatherization services.
- The pre-program arrearage will be the same at the time of re-instatement as at the time of default.

- Any charges incurred after default, which are not paid by the customer, are treated as current bill shortfall.
- This process also applies to CAP customers who move to a new service address with no interruption of service due to termination.

### **CAP Balance Clarification for re-entry into CAP less than four years from removal date**

When a customer leaves CAP, for any reason, but remains a customer, Columbia will maintain the customer's "CAP balance" separately, including CAP arrears, if any. As the customer receives a monthly non-CAP bill, his/her CAP balance will increase by the monthly asked-to-pay amount. As a customer makes a non-CAP payment or receives an energy assistance grant, the customer's CAP balance reduces by that payment or LIHEAP credit. In the future, should the customer reapply for CAP, he/she would first need to pay the full CAP balance-including amounts accrued while out of the program. The Company will accept any grant amounts in lieu of customer payments for re-enrollment.

Once the CAP balance is paid in full and the customer is re-enrolled in CAP, Columbia will retroactively apply 1/36<sup>th</sup> pre-program arrearage forgiveness for each month the customer spent out of the program. Columbia will also remove any new non-CAP arrears created since CAP removal and treat it as shortfall.

This process balances the customer's account as though the customer had remained in CAP throughout. In addition, the process encourages year-round participation and avoids seasonal fluctuations in CAP participation.

### **CAP Re-instatement for Customers out of CAP for four years or more**

Customers applying for the CAP with a removal date greater than that of four years or more will be treated as if they were never enrolled in CAP. They will follow all intake and enrollment procedures and receive the same benefits as first time enrollees.

### **Re-verification**

Re-verification of income is necessary to ensure that only low-income customers are offered a subsidized payment plan under CAP. CAP customers are required to provide proof of income every two years, with the following exceptions:

- 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.
- CAP households reporting no income are required to re-certify every six

months at a minimum (regardless of LIHEAP participation).

Columbia issues notification letters requiring income re-verification per the above schedule to customers 30 days prior to each customer's CAP re-verification due date. CAP participants are then required to provide verification of their household income to the Administrating Organization for processing. In turn, the customer will receive a letter verifying the customer's continued participation in CAP and detailing any changes made to their required CAP payment. For customers preferring to re-verify in person, appointments can be made available with a screening agency.

Columbia will remove from CAP any customer who fails to re-verify income within 30 days after the re-verification due date and 60 days after the issuance of the notification letter that verified income is required.

Customers who claim zero income will be required to verify their income after six months of participation. A customer will continue to be required to verify their income every six months for as long as they verify at zero income. Income verification will include completing a standard form documenting zero income. See Attachment D.

Once removed for failure to re-verify income, a customer will be re-entered into CAP immediately after eligible proof of income is received.

### **Arrearage Retirement**

One-thirty-sixth (1/36) of the pre-program balance is forgiven for every full CAP payment received regardless of arrears and retroactively for any months missed once those months are paid. For example, if a CAP customer is delinquent for three months of payments, and makes catch-up payments for two of those three months, the customer will receive arrearage forgiveness for those two months. A customer's total pre-program arrearage will be forgiven after thirty-six full CAP payments. The customer retirement is clearly noted on the account summary portion of the monthly CAP bill.

### **Universal Service Projected Needs Assessment**

Columbia developed the projected needs assessment on the premise that Universal Service Programs should be offered as a menu of options to suit the circumstances of individual customers. Columbia assesses the potential participant and recommends the programs that best suit his or her payment-troubled situation. One size does not fit all, nor does one program suit all customers.

Columbia has implemented this philosophy through administrative processes within its

customer services protocols to serve its low-income, payment-troubled customers at the first point of contact. This process was previously referred to as the One-Stop-Shop approach.

Columbia referenced two sources to complete this assessment. The first is the 2022 Federal Census Data, the most current census data available. The second is Columbia's customer information system.

The Bureau of Consumer Services developed a Needs Assessment Proposal dated May 9, 2001, to help define and illustrate what is expected in the needs assessment. The proposal outlined the following six criteria:

1) Identified Low-Income Customers

The Company reports an average of 70,084 customers that self-declared as low income or verified income through LIHEAP or CAP.

**2. Estimated Low-income Customers**

In addition to quantifying verified and self-declared low-income customers, Columbia also uses updated federal census data to estimate the number of low-income customers that it serves. The table below references the number of residential households that Columbia serves in each county and equates that to the percentage compared to the total number of households within each county. The census data indicates that there are 379,434 low-income households within the counties that Columbia serves. Using the same percentage, 91,849 households are estimated to be Columbia low-income households

County	Customer Count	Census Household	Percent Customers CPA	Census Household Low-Income at <150%	Low-Income CPA
ADAMS	14,773	39,908	37.02%	7,155	2,649
ALLEGHENY	102,588	545,763	18.80%	122,040	22,940
ARMSTRONG	857	27,704	3.09%	6,853	212
BEAVER	35,900	71,717	50.06%	16,084	8,051
BEDFORD	12	19,334	0.06%	5,255	3
BUTLER	9,608	78,365	12.26%	14,475	1,775
CENTRE	13,758	57,834	23.79%	17,533	4,171
CLARION	3,533	14,632	24.15%	4,854	1,172
ELK	31	13,499	0.23%	3,174	7
FAYETTE	22,111	54,097	40.87%	16,690	6,822
FRANKLIN	4,782	61,854	7.73%	15,070	1,165
FULTON	4	5,990	0.07%	1,425	1
GREENE	2,690	13,957	19.27%	3,518	678
INDIANA	550	32,425	1.70%	10,162	172
JEFFERSON	352	17,745	1.98%	5,463	108
LAWRENCE	18,131	36,111	50.21%	10,506	5,275
MCKEAN	3,145	15,776	19.94%	5,136	1,024
MERCER	29	45,798	0.06%	12,433	8
SOMERSET	4,782	28,857	16.57%	7,446	1,234
VENANGO	684	16,070	4.26%	5,907	251
WARREN	2,355	17,124	13.75%	4,331	596
WASHINGTON	43,941	86,028	51.08%	17,016	8,691
WESTMORELAND	20,825	152,288	13.67%	32,291	4,416
YORK	104,113	176,428	59.01%	34,617	20,428
<b>TOTAL</b>	<b>409,554</b>	<b>1,629,304</b>		<b>379,434</b>	<b>91,849</b>

- 1) **Columbia Customer Count** – Number of households per county served by Columbia.
- 2) **Census Household** – Number of households per county identified by census data.
- 3) **Percent Customers Columbia** – Percent of total county households served by Columbia (#1 / #2).
- 4) **Census Household Low-Income** – Number of low-income households per county identified by census data.
- 5) **Low-Income Columbia** – Estimated number of low-income households per county served by Columbia (#3 X #4).

### 3. The Number of Identified Payment-troubled, Low-income Customers

Based upon the definitions at 52 Pa. Code §§ 54.72, 62.2 and 69.262, "Payment Troubled" is defined as a household that has failed to maintain one or more payment arrangements in a one-year period. Columbia used data gained from its actual experiences to identify the number of payment-troubled customers. Columbia reviewed confirmed low-income accounts that are in arrears on payment agreements and not on payment agreements and took the average monthly of both to arrive at the identified, payment-troubled low-income total of 9,320.

### 4. Estimate of Potentially Payment-troubled, Low-income Customers

Next, Columbia compared the data obtained from its customer information system to census data. The number of customers identified as low-income based on Columbia's customer information system is 70,084. The number of customers estimated by census data to be low income is 91,849. The census figures suggest that Columbia's service territory has 21,765 more low-income customers than Columbia's data indicate. However, Columbia does not serve all customers in every county. Therefore, Columbia's estimate is not exact. In fact, Columbia recently purchased data from a third-party credit company that estimated Columbia's low-income population to be 57,686 at the zip code level.

### 5 Number of Customers Who Still Need LIURP Services and the Cost to Serve that Number

Pursuant to BCS's May 9, 2001, Needs Assessment Proposal, Columbia identified the number of customers that meet the LIURP eligibility criteria, excluding those customers who have already received weatherization services. According to data from Columbia's customer information system, 24,933 customers meet the LIURP eligibility criteria. Of that total, 13,531 are property owners while the remaining 11,402 are renters. Columbia historically has had difficulty obtaining landlord approvals to weatherize homes. Assuming a 50% success rate, Columbia anticipates that half of the 11,402 renters in addition to the 13,531 property owners, totaling 24,933 could receive weatherization services. The estimated cost to provide weatherization services to these customers is \$286,455,237 at Columbia's current average expenditure per weatherized household.

### 6 Enrollment Size of CAP to Serve All Eligible Customers

Columbia projects its CAP to range from 25,000 to 31,000 during this USECP. However, Columbia does not have a CAP enrollment ceiling and strives to ensure that every potentially eligible customer is aware of the program and has the necessary information and tools to apply if desired.

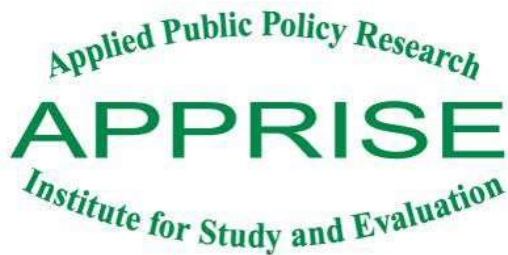
## Projected Enrollment \*

	2024	2025	2026	2027	2028
<b>LIURP</b>	455	455	425	425	425
<b>ERP</b>	296	290	290	290	290
<b>CARES</b>	400	400	400	400	400
<b>CAP</b>	25,725	27,011	28,362	29,780	31,000
<b>Hardship Funds</b>	1,300	800	800	800	800

\* The projected enrollments stated in this table are estimates and should not be considered ceilings. Although Columbia is estimating enrollment levels, Columbia will continue to promote programs and enroll customers needing assistance beyond these participation levels as needed.

## Conclusion

Columbia's Universal Service Program is designed to address the multifaceted needs of Columbia's diverse customer base. The present array of Universal Service Programs is an appropriate mix of services that meets the requirements of 66 Pa. C.S. § 2203(8) and 52 Pa. Code Chapter 62. Columbia respectfully requests that the Commission approve the changes identified herein. In addition, Columbia respectfully requests that the Commission approve its 2024-2028 Universal Service and Energy Conservation Plan in its entirety.



# MEMO

---

**DATE:** September 7, 2017

**TO:** Deb Davis

**FROM:** Jackie Berger

**SUBJECT:** Columbia Gas LIURP Health and Safety Research

---

This memo provides a summary of research conducted on health and safety barriers and potential approaches in Columbia Gas of Pennsylvania's Low-Income Usage Reduction Program (LIURP).

## I. Introduction

Many low-income usage reduction programs are facing increasing challenges serving customers due to the prevalence of health and safety problems that prevent major measures from being installed. As a result of serious issues in the home, customers must be deferred or are treated with only minor services, and high-usage customer with good potential for savings do not participate or only achieve low energy savings. This research provides an assessment of the circumstances under which additional cost-effective health and safety spending can be made to achieve greater savings for low-income customers and the program as a whole.

## II. Research Tasks

This section provides a description of the research tasks and associated findings.

### A. Assessing the Problem – Deferred Jobs and Jobs without Major Measures

The first step in the research was to assess the extent of the issue. We analyzed Columbia Gas' 2015 program database, reviewed the cancelled jobs spreadsheet, and reviewed job paperwork. We considered jobs in the following categories as the initial list of indicators that a health and safety issue prevented weatherization work.

- No measure invoice data.
- Job marked as incomplete.
- No blower door test data.
- Blower door indicator marked as not done.

Table II-1 shows that a significant percent of jobs had these issues. Overall, 46 percent of the 997 jobs in the 2015 database had one or more of the issues.

**Table II-1**  
**Assessment of 2015 Jobs with Potential Health and Safety Issues**

Indicator of Potential Issue	Number	Percent
No Invoice Data	225	23%

Incomplete Job	391	39%
No Blower Door Test	398	40%
Blower Door Indicator=0	382	38%
Any of Four Issues Listed	462	46%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

We next identified jobs that may be limited due to health and safety issues as those where total job costs were less than \$750 or total job costs minus heating system replacement costs were less than \$750. Table II-2 shows that 35 percent of jobs had at least one of these issues.

**Table II-2  
Assessment of 2015 Jobs that May Have Been Limited  
Due to Health and Safety Issues**

<b>Cost Issue</b>	<b>Number</b>	<b>Percent</b>
Total Job Costs <\$750	330	33%
Non-Heating Replacement Job Costs<\$750	346	35%
Either Cost Issue	346	35%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

Table II-3 shows that when considering all of the issues described above, 47 percent of the 997 jobs were flagged as having a potential health and safety issue.

**Table II-3  
Assessment of 2015 Jobs with Potential Health and Safety Issues  
Based on All Analysis Factors**

<b>Indicator of Potential Issue</b>	<b>Number</b>	<b>Percent</b>
No Invoice Data	225	23%
Incomplete Job	391	39%
No Blower Door Test	398	40%
Blower Door Indicator =0	382	38%
Either Cost Issue	346	35%
Any of Five Issues Listed	467	47%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

We next merged these jobs with Columbia Gas’ cancelled/deferred jobs spreadsheet. Of the 467 jobs identified as having potential health and safety issues, 329 were in Columbia Gas’ cancelled/deferred jobs spreadsheet. When we assessed the reason for the cancelled job, we found that 91 of these jobs were cancelled or deferred due to health and safety issues, and the others were cancelled for other reasons including customer refusal and ineligibility.

We requested a total of 229 job files from Columbia Gas, the 91 cancelled/deferred jobs with health and safety issues and the additional 138 jobs that were identified as having potential health and safety issues, but were not in Columbia Gas’ cancelled/deferred spreadsheet.

Table II-4 shows the number and percent of jobs that were initially flagged as potentially having a health and safety issue (and one additional job that was not initially flagged but was included in Columbia Gas’ cancelled jobs spreadsheet.) The total number of jobs was 468. The table also shows the number and percent that were identified as having a health and safety issue that prevented energy efficiency work based upon detailed review of the customer’s file. The job file usually included the audit form, work scope, and measure invoice(s). All of the materials in the file were reviewed to assess whether there was a health and safety issue that prevented work from being completed.

The table shows that overall 26 percent of the flagged jobs and 120 jobs in total had a health and safety issue that prevented weatherization.

**Table II-4  
2015 Jobs with Health and Safety Issues**

Indicator of Potential Issue	All Jobs		H&S Issue	
	Number	Percent	Number	Percent
No Invoice Data	225	23%	6	3%
Incomplete Job	391	39%	70	18%
No Blower Door Test	399	40%	93	23%
Blower Door Indicator =0	382	38%	81	21%
Either Cost Issue	346	35%	48	14%
Cancelled Jobs	329	33%	30	9%
Any of Six Issues Listed	468	47%	120	26%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>	--	--

The file review described above was also the source of information for the specific health and safety issue(s). Table II-5 displays the prevalence of major health and safety issues. Note that jobs could have more than one issue identified, so percentages do not sum to 100 percent. The most common issue was mold and/or moisture which prevented eight percent of jobs from being completed and comprised 68 percent of the health and safety issues. The other most common issues were knob and tube wiring and roof leaks.

**Table II-5  
2015 Frequency of Specific Health and Safety Issues**

H&S Issue	Jobs with Health & Safety Issues that Prevented Work		
	Number	Percent of All Jobs	Percent of H&S Issues
Mold or Moisture	83	8%	68%
Knob and Tube Wiring	41	4%	34%
Roof Leak	38	4%	31%
Asbestos/Vermiculite	18	2%	15%
Sewage Leak	13	1%	11%
Infestation	12	1%	10%
Structural Issues	12	1%	10%
Holes in Attic Floor	10	1%	8%
Clutter	8	1%	7%
Other	21	2%	17%
Any Issue	122	12%	100%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>	<b>100%</b>

**B. Current Health and Safety Approach**

Columbia Gas allows contractors to spend up to \$650 on health and safety repairs regardless of whether the customer owns or rents the home. For renters, this funding is usually related to HVAC repairs that will allow for weatherization work to be completed. If the customer owns the home, the \$650 may be used for a roof patch repair, or for a small amount of mold remediation.

Columbia Gas will approve additional spending on a case-by-case basis when contractors call to request additional funding. One of the most consistent areas where contractors ask for additional funding is for knob & tube abatement which may cost from \$1,000 to \$3,000. If Columbia Gas believes that the customer will get higher savings because there is no insulation in the attic, Columbia Gas would approve such a request. This would result in higher health and safety spending and higher total job spending above the initial calculated total spending target.

Contractors have various risk thresholds. Some will do any repairs that Columbia Gas permits so that they can proceed with the job, and some will not address the home if there is any water in the basement, for example. Columbia Gas leaves it up to the contractor to decide what issues to address because the contractor has the responsibility for the liability. Columbia Gas could potentially re-assign a job to another contractor who is willing to do the health and safety remediation work if the originally assigned contractor would not do so.

Table II-6 displays the percent of completed jobs included in the 2013-2015 evaluations with various health and safety repairs and the cost distribution for those repairs. Overall, 74 percent of the jobs had at least one of these repairs and the average cost of all repairs in the home was \$453. Ten percent of jobs had total repair costs of more than \$1,025. The most common issue was dryer venting, which was included in half of the 2013-2015 jobs. Miscellaneous repairs in the LIURP codebook include chimney, windows, and electrical repairs. Interior repairs include floor, wall, ceiling, floor under bath, wall plaster, ceiling plaster, and other pre-air sealing repairs.

**Table II-6  
2013-2015 Health and Safety Repairs and Spending Distribution**

	Repair Issue		Repair Cost (For Those with Repair)							
	Number	Percent	Mean	Percentile						
				Min	10	25	50	75	90	Max
Dryer Venting	693	50%	\$91	\$10	\$57	\$75	\$90	\$91	\$119	\$635
Miscellaneous	528	38%	\$392	\$0	\$31	\$48	\$102	\$239	\$1,388	\$6,464
Interior	485	35%	\$304	\$8	\$75	\$112	\$153	\$345	\$684	\$2,654
Kitchen or Bath Exhaust	158	11%	\$236	\$28	\$82	\$125	\$202	\$350	\$420	\$1,016
Roof	68	5%	\$167	\$20	\$70	\$85	\$85	\$170	\$370	\$850
<b>Total – Any Repair</b>	<b>1,028</b>	<b>74%</b>	<b>\$453</b>	<b>\$0</b>	<b>\$80</b>	<b>\$105</b>	<b>\$230</b>	<b>\$440</b>	<b>\$1,025</b>	<b>\$6,625</b>

Note: One customer with a Misc. repair had no costs.

### C. LIURP Savings Results

We analyzed Columbia Gas' 2013, 2014, and 2015 LIURP evaluation data to understand the level of savings achieved based on weather normalized pre-treatment usage, contractor, measures, job costs, and other characteristics.

Table II-7 displays the mean energy savings for 2015 jobs alone and the jobs completed in 2013 through 2015. We focus on the three-year analysis in this study to provide more jobs for analysis and a better prediction of energy savings based on job characteristics. While mean savings in 2015 were 258 ccf or 17.8 percent of pre-treatment usage, mean savings over the 3-year period were 304 ccf or 20.1 percent of pre-treatment usage.

**Table II-7  
Weather-Normalized Gas Heating Savings Analysis**

Analysis Group	Obs.	Usage (ccf)		Savings	
		Pre	Post	ccf	%
2015	533	1,449	1,191	258**	17.8%
2013-2015	1,398	1,515	1,211	304**	20.1%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-8 displays the mean energy savings for 2013-2015 jobs by pre-treatment usage. We use the 3-year period to provide a greater number of jobs in each usage bin. The table provides the following information.

- **Job Cost:** The mean job cost does not increase linearly with the pre-treatment usage, indicating that the number and depth of measures does not increase at the same rate as pre-treatment usage. There is likely to be variance caused by differences in contractors’ practices and costs, and by home conditions that impact energy-saving opportunities.
- **CCF savings:** The amount of natural gas saved does increase linearly with pre-treatment weather-normalized usage. While jobs with pre-treatment usage of less than 1,000 ccf save an average of 159 ccf, jobs with pre-treatment usage of 1,201 to 1,300 ccf save an average of 245 ccf, jobs with 1,701 to 1,800 ccf save an average of 345 ccf, and jobs with pre-treatment usage over 2,200 save an average of 629 ccf.
- **Percent savings:** The percent of pre-treatment usage saved generally increases with pre-treatment usage, but not as consistently as the amount saved.

**Table II-8  
2013-2015 Savings by Pre-Treatment Usage**

Weather-Normalized Pre-Treatment Usage (ccf)	2013-2015 Participants					
	Obs.	Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<1,000	104	\$5,514	927	767	159**	17.2%
1,001-1,100	122	\$4,935	1,049	877	172**	16.4%
1,101-1,200	118	\$5,672	1,151	929	222**	19.3%
1,201-1,300	136	\$5,307	1,249	1,004	245**	19.6%
1,301-1,400	159	\$5,288	1,349	1,097	252**	18.7%
1,401-1,500	125	\$5,574	1,448	1,147	301**	20.8%
1,501-1,600	151	\$5,135	1,547	1,234	313**	20.2%
1,601-1,700	112	\$5,217	1,648	1,340	308**	18.7%
1,701-1,800	89	\$5,130	1,746	1,402	345**	19.8%
1,801-1,900	67	\$5,648	1,847	1,436	410**	22.2%
1,901-2,000	54	\$6,169	1,947	1,535	412**	21.2%
2,001-2,200	60	\$6,408	2,082	1,663	419**	20.1%
2,201+	101	\$7,601	2,627	1,999	629**	23.9%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-9 displays 2013-2015 savings by contractor for all contractors who had at least 50 jobs included in the 2013-2015 evaluations. Average savings vary significantly by contractor. Contractors with the lowest savings had mean savings of about 200 ccf or 15 percent of pre-treatment usage, and one

contractor with the highest savings who had 306 jobs included in the evaluations saved an average of 433 ccf or 27.5 percent of pre-treatment usage.

**Table II-9  
2013-2015 Savings by Contractor**

Contractor Code	2013-2015 Participants					
	Obs.	Mean Cost	Usage		Savings	
			Pre	Post	ccf	%
28	306	\$8,184	1,573	1,140	433**	27.5%
83	169	\$4,968	1,528	1,270	257**	16.8%
101	121	\$8,322	1,478	1,168	310**	21.0%
74	108	\$7,836	1,458	1,121	336**	23.1%
96	98	\$5,160	1,436	1,141	294**	20.5%
90	96	\$7,046	1,420	1,187	233**	16.4%
102	81	\$5,105	1,619	1,374	245**	15.1%
77	78	\$5,979	1,467	1,171	296**	20.2%
108	76	\$8,052	1,317	1,116	201**	15.3%
75	66	\$5,445	1,526	1,299	226**	14.8%
103	57	\$7,677	1,716	1,441	275**	16.0%
Others	142	\$7,852	1,558	1,306	253**	16.2%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-10 displays the savings by the total job cost. The table shows that jobs with higher costs have greater savings. While jobs with total costs under \$4,000 saved an average of 180 ccf, jobs with total costs of more than 10,000 saved an average of 458 ccf.

**Table II-10  
2013-2015 Savings by Total Cost**

Total Cost	2013-2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=\$4,000	264	\$2,806	1,492	1,312	180**	12.1%

Total Cost	2013-2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
\$4,001-\$6,000	336	\$5,112	1,505	1,272	233**	15.5%
\$6,001-\$8,000	320	\$6,970	1,511	1,192	318**	21.1%
\$8,000-\$10,000	230	\$8,898	1,504	1,137	367**	24.4%
>\$10,000	248	\$12,288	1,571	1,113	458**	29.2%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-11 displays the savings by the job cost excluding the cost of heating system replacements. Savings also increase with these costs.

**Table II-11**  
**2013-2015 Savings by Total Cost**  
**Excluding Heating System Replacement**

Total Cost	Treatment Group					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=\$4,000	451	\$2,434	1,505	1,271	234**	15.5%
\$4,001-\$6,000	374	\$5,101	1,497	1,218	278**	18.6%
\$6,001-\$8,000	353	\$6,966	1,488	1,131	357**	24.0%
>\$8,000	220	\$11,341	1,612	1,202	410**	25.4%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-12 displays savings by whether or not certain measures were installed. The table shows that for all measures except heating system repair, jobs with the measure saved more than those without. For example, while jobs with blower door guided air sealing saved an average of 323 ccf, jobs without that measure saved an average of 290 ccf. While jobs with a heating system replacement saved an average of 392 ccf, jobs without a heating system replacement saved an average of 239 ccf.

**Table II-12**  
**2013-2015 Savings by Measures Installed**

Total Cost	2013-2015 Participants			
	Obs.	Mean	Usage	Savings

		Total Cost	Pre	Post	ccf	%
Blower Door Test						
Yes	1,282	\$7,188	1,513	1,204	310**	20.5%
No	116	\$4,902	1,537	1,291	247**	16.0%
Blower Door Guided Air Sealing						
Yes	618	\$7,110	1,517	1,195	323**	21.3%
No	780	\$6,909	1,514	1,224	290**	19.2%
Insulation						
Yes	1,116	\$7,581	1,509	1,185	323**	21.4%
No	282	\$4,692	1,542	1,312	231**	15.0%
Blower Door Guided Air Sealing & Insulation						
Yes	563	\$7,403	1,513	1,173	339**	22.4%
No	835	\$6,724	1,517	1,236	281**	18.5%
Heating System Repair						
Yes	390	\$7,394	1,467	1,191	275**	18.8%
No	1,008	\$6,845	1,534	1,218	316**	20.6%
Heating System Replacement						
Yes	599	\$8,762	1,526	1,133	392**	25.7%
No	799	\$5,676	1,508	1,269	239**	15.8%
Duct Work						
Yes	546	\$7,097	1,458	1,115	343**	23.5%
No	852	\$6,935	1,552	1,272	280**	18.0%
Health & Safety Repairs						
Yes	1,028	\$7,433	1,508	1,190	317**	21.0%
No	370	\$5,789	1,537	1,267	270**	17.5%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-13 displays savings for 2015 jobs by the blower door measured leakage reduction (for jobs with pre- and post-treatment testing values). This table is only shown for 2015, because the additional database that contains this information was not analyzed for the other program years. The table shows that savings increase as the CFM50 reduction increases.

**Table II-13  
2015 Savings by Blower Door Leakage Reduction**

CFM50 Reduction	2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=500	140	\$7,183	1,437	1,224	213**	14.8%
500-1,000	80	\$6,771	1,430	1,174	257**	17.9%
1,001-2,000	111	\$7,373	1,408	1,107	300**	21.3%
>2,000	96	\$8,880	1,585	1,242	343**	21.6%
All	427	\$7,537	1,461	1,188	273**	18.7%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

**D. Potential Savings for Homes with Health and Safety Problems**

We conducted regression analysis to assess the job-related factors that do the best at predicting energy savings. After running several models, the following model kept the variables that were statistically significant, as shown in Table II-14.

**Table II-14  
2013-2015 Regression Analysis**

Variable	2013-2015 Participants (1,372 observations)		
	Coefficient	95% Confidence Interval	
Pre-Treatment Usage (ccf)	0.30	0.27	0.32
Home Age	-1.06	-1.51	-0.61
Square Feet	-0.09	-0.11	-0.07
Blower Door and Air Sealing Cost	0.05	0.04	0.05
Heating System Replaced (yes/no)	154.56	131.84	177.28
Duct Sealing (yes/no)	55.80	32.41	79.19
Contractor #74	79.58	36.48	122.67
Contractor #77	73.69	23.52	123.86
Contractor # 102	-72.10	-119.97	-24.22
Contractor # 103	-106.37	-162.50	-50.24

Variable	2013-2015 Participants (1,372 observations)		
	Coefficient	95% Confidence Interval	
Constant	-73.01	-135.24	-10.79

Previous iterations of the regression included the following variables, but these were not found to be significant.

- Home Ownership
- Row Home (as opposed to single-family)
- Contractors not included above
- Blower-door reduction (2015 regression only)
- Health and Safety Repairs (yes/no)
- Health and Safety Repair Costs

#### E. Decision Framework for Additional Health and Safety Investments

Based on this research, we developed a decision framework for how much to spend on health and safety. Table II-15 displays some examples of model inputs and outputs. The table shows a range of pre-treatment usage, home age, home size, and measure investments. Based on the inputted fields, the model calculates the predicted annual savings and percent savings, the present discounted value of savings assuming a five percent discount rate, and the maximum spending on health and safety given the projected savings and the measure-level spending. The maximum spending is based upon the current price of \$1.04723 per therm of natural gas.

In addition to showing the discounted present value of savings, the table shows twelve years of savings without discounting, which leads to higher total savings and a greater amount allocated for health and safety spending. Under Scenario 5, a large old home with high pre-treatment usage, and a large investment in air sealing and other measures, the model shows that there can be up to \$8,805 spent on health and safety (with no discounting) and the job will still be cost-effective.

**Table II-15  
Model Scenarios**

Variable		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
User Entered Fields	Pre-Treatment Therms	1500	1600	2500	3800	5000
	Home Age	50	30	100	100	100
	Square Feet	1500	1250	2000	3200	3200
	Air seal + Insulation Cost	\$800	\$1,400	\$1,000	\$2,700	\$5,000
	Heat Sys Replace (yes=1)	0	0	1	1	1
	Duct Sealing (yes=1)	0	1	0	1	1
	Contractor 74	0	0	0	1	0
	Contractor 102	0	1	0	0	0
	Contractor 77	0	0	0	0	1
	Contractor 103	0	0	0	0	0
	Heat Sys Cost	0	\$0	\$3,500	\$3,500	\$3,500
	Other Non H&S Costs	\$800	\$800	\$1,000	\$1,000	\$2,000

Calc Fields (5% discount)	Annual Savings (Therms)	214	301	578	1075	1536
	Calculated % Savings	14%	19%	23%	28%	31%
	PDV Savings (Therms)	1897	2672	5126	9527	13615
	Max Spending	\$1,986	\$2,798	\$5,368	\$9,977	\$14,258
	Total Non H&S Costs	\$1,600	\$2,200	\$5,500	\$7,200	\$10,500
	H&S Allowance	\$386	\$598	-\$132	\$2,777	\$3,758
Calc Fields (no discount)	12-Year Savings (Therms)	2568	3618	6940	12898	18434
	Max Spending	\$2,689	\$3,789	\$7,267	\$13,507	\$19,305
	H&S Allowance	\$1,089	\$1,589	\$1,767	\$6,307	\$8,805

The model provided above is an alternative to Columbia Gas' current method of projecting job savings and an initial spending allocation. Columbia Gas' current method applies a specific savings factor to pre-treatment usage for each contractor based on their historical savings. When we run a regression that only controls for pre-treatment usage and contractor, we find that 25 percent of the variation in savings is accounted for by those factors. However, when we run the model shown in Table II-14 and used in the analysis above, we find that 43 percent of the variation of savings is explained by the model. Therefore, this model that takes account of additional factors does a better job of predicting savings. This model only includes the contractors who have statistically significant differences in savings after controlling for the other factors. Some contractors may have higher or lower savings than average, but those differences are better explained by differences in factors included in the model, and given those factors, those contractors do not have savings that are statistically different than the other contractors.

Under Columbia Gas' current method of determining the initial amount of spending, they allow for an adjustment if the contractor feels that he will be able to obtain greater savings than his usual percentage given the opportunities in the home. For example, if the contractor has historical savings of 20 percent, but feels that he can achieve 25 percent on the home, Columbia Gas may raise the spending ceiling. Under this revised approach, Columbia Gas could also provide that same flexibility if desired. However, they would use this alternative model estimate as the starting point for the spending cap, rather than the simple percentage savings based on the contractor's historical savings level.

Tables II-16A and II-16B provide information on measure costs over the three years of analysis, 2013 through 2015. There were 1,398 jobs included in this analysis. These tables provided information used in projecting costs for various measures that were included in the scenarios examined.

**Table II-16A  
Measure Costs**

Costs	Mean	Min	Percentile					Max
			P10	P25	P50	P75	P90	
Blower Door Air Sealing	\$147	\$0	\$0	\$0	\$0	\$150	\$424	\$3,395
Insulation	\$2,012	\$0	\$0	\$302	\$1,686	\$3,260	\$4,664	\$10,514
BD Air Seal+Insul	\$2,159	\$0	\$0	\$487	\$1,850	\$3,439	\$4,817	\$10,854
Duct Sealing	\$84	\$0	\$0	\$0	\$0	\$89	\$180	\$6,700
Heating System Repair	\$162	\$0	\$0	\$0	\$0	\$80	\$529	\$7,269
Heating System Replacement	\$1,557	\$0	\$0	\$0	\$0	\$2,950	\$4,550	\$10,375

Health and Safety Costs	\$333	\$0	\$0	\$0	\$140	\$324	\$774	\$6,625
Total Costs-Air Sealing-Insulation	\$4,839	\$0	\$1,801	\$2,770	\$4,293	\$6,376	\$8,384	\$20,302
Total-Air Sealing-Insulation-Duct Sealing	\$4,755	\$0	\$1,781	\$2,688	\$4,226	\$6,285	\$8,296	\$20,302
Total Costs-Health & Safety	\$6,664	\$0	\$2,875	\$4,387	\$6,333	\$8,583	\$10,685	\$23,390
Total Costs	\$6,998	\$0	\$3,056	\$4,656	\$6,592	\$8,930	\$11,258	\$23,597

**Table II-16B**

**Measure Costs**

Costs	% with Measure	# with Measure	Costs Statistics for those with Measure					
			Mean	P10	P25	P50	P75	P90
Blower Door Air Sealing	44%	618	\$334	\$75	\$150	\$170	\$377	\$725
Insulation	80%	1,116	\$2,520	\$483	\$1,151	\$2,292	\$3,655	\$4,883
Duct Sealing	39%	546	\$215	\$65	\$85	\$134	\$180	\$381
Heating System Repair	28%	390	\$580	\$80	\$175	\$361	\$696	\$1,361
Heating System Replacement	43%	599	\$3,635	\$2,483	\$2,760	\$3,162	\$4,458	\$5,560
Health & Safety	74%	1,028	\$453	\$80	\$105	\$230	\$440	\$1,025
Total Costs	99%	1,395	\$7,013	\$3,094	\$4,688	\$6,602	\$8,946	\$11,258

**III. Summary**

This memo provided the results from a study of Columbia Gas' LIURP program, health and safety barriers, health and safety expenditures, and a new approach for determining total and health and safety spending. We find that, depending on the job characteristics, Columbia Gas may be able to spend a significant amount of funds on health and safety and still achieve cost-effective savings, given the high level of opportunities for savings found in the home. This approach would yield high energy savings, reduced costs for ratepayers who are contributing to the costs of the Customer Assistance Program (CAP), and greater likelihood that the customer may be able to afford the full bill if the household exits CAP at some point in the future. We recommend that Columbia Gas pilot this approach on high-usage homes with significant health and safety barriers and assess the level of savings that are achieved.

Columbia Gas of Pennsylvania, Inc.

C A P

**CUSTOMER AGREEMENT FORM**

As a participant in the Columbia Gas of Pennsylvania’s Customer Assistance Program, I agree to accept all of the program conditions as listed below. Failure to agree or follow through on any of the accepted conditions will result in removal from the CAP Program.

**I agree to:**

- Verify gross monthly income at time of application.
- Re-verify gross monthly income every other year; unless you apply and receive an Energy Assistance Grant and it is posted to Columbia Gas.
- Notify the Universal Service Representative at **1-800-537-7431** of any changes in income, household size or residence.
- Pay the CAP payment, monthly, by the due date.
- Resume paying your full CAP installment when your LIHEAP grant is exhausted.
- Call Columbia Gas CAP immediately if you are no longer able to afford your CAP plan to avoid getting behind on your bill.
- Apply for any free weatherization service including the Columbia Gas Warm Wjse LIURP Program if I meet the eligibility requirements.
- Authorize Columbia Gas to share and use data including, but not limited to, income, and household member information furnished by me or on my behalf regarding me or members of my household concerning any application for, or participation in, the Program, with the Public Utilities Commission and entities on which Columbia relies for Program eligibility verification. Such sharing and use of the information shall be consistent with applicable law.
- The facts set forth in this application are true and complete to the best of my knowledge. Dollar Energy Fund, Inc. reserves the right to further verify income if necessary. I understand and accept that false or incomplete statements on this application will be cause for rejecting my application or removal from the program.
- Accept any program change resulting from modifications to the program made by Columbia Gas of Pennsylvania, Inc., with the Bureau of Consumer Services approval.

In addition, by signing below I confirm that the facts set forth in my CAP application are true and complete to the best of my knowledge. I also hereby authorize Columbia Gas to further verify my household income, as Columbia Gas deems appropriate. I understand, agree and accept that false or incomplete statements on my CAP application will be cause for rejecting my application or removal from the Program.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

Reviewed by: \_\_\_\_\_

\_\_\_\_\_  
Agency Code

Income Chart for CAP

<b>Income Type</b>	<b>Acceptable Proof of Income</b>
<b>Black Lung Benefits</b>	Coal mine worker's compensation of expected benefit statement Bank statement from the last 30 days (last resort)
<b>Cash Assistance</b> <i>Public Assistance</i>	Benefits statement (both sides) Printout from DPW website Letter from caseworker on letterhead
<b>Child/Spousal Support</b>	Court order (only if receiving amount ordered) Domestic relations printout (last 30 days) – <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days) <a href="http://www.GoProgam.com">www.GoProgam.com</a> Bank Statement (last 30 days) Passthrough Welfare: Benefits statement from welfare both sides Voluntary child support or spousal support: Use other income form
<b>Foster Care/Adoption</b>	Statement from Social Services Letter from the adoption agency or state or county office stating amount of compensation that will be received Copy of all checks (last 30 days) Other Income form (last resort)
<b>Investment Income</b> <i>Interest</i>	Dividend Statement Bank Statement showing payment
<b>Long Term or Short-Term Disability</b> <i>Disability</i>	Benefits statement Copy of disability checks/check stubs (last 30 days) Bank statement (last 30 days)
<b>Other Income</b> (includes cash contributions)	Other Income Form
<b>Rental Income</b>	Copy of the lease or rental agreement Copy of a receipt for the rent Other income form (last resort)
<b>Retirement Income</b>	<i>Called "Pension", "IRA", "Annuity"</i> If Pension: Pension board letter, Copy of pension check with stub attached  Copy of 1099 Copy of Form 5498 for Roth IRA Copy of pension check with stub attached Bank statement from current year
<b>Royalties</b>	Monthly Royalty Statement Copy of royalty check (last 30 days) Bank Statement (last 30 days) Other Income Form (last resort)
<b>Salary &amp; Wages</b> <i>(Employment)</i>	Paystubs for the last 30 days Letter from employer Handwritten Paystubs? Complete other income form Uber/Lyft/DoorDash/Instacart/ETC: Last 30 days of payment summary Military Pay: Military LES (Leave & Earnings Statement) from last 30 days 17-year-old and younger/18-year-old still in high school: Wages are not counted as income for any program.
<b>Self-Employment</b> (Includes subcontractors)	Quarterly statement from accountant QuickBooks or other type of online ledger Statement from Accountant on letterhead stating the income from the last 30 days Tax Return 1040 and Schedule C

	<p>Copy of 1099 If in partnership, Schedule K1 &amp; Schedule E Other Income Form (last resort)</p> <p>Subcontractor: 1099 for previous tax year is acceptable if they don't have paystubs</p>
<p><b>Social Security</b></p> <p><i>Social Security</i> <i>SS Disability</i> <i>SSI</i> Survivor Benefits list under <i>Social Security</i></p>	<p>Social Security Benefit Statement (also called award letter) Current year <a href="http://www.socialsecurity.gov/myaccount">www.socialsecurity.gov/myaccount</a> or call 1-800-772-1213 Bank Statement Letter from bank on letterhead confirming direct deposits Copy of 1099</p> <p>NOTE: Medicare is deducted for seniors.</p> <p><b>SSI State Supplement of \$22.10 or less</b>- No verification needed</p>
<b>Stipend</b>	W2/1099/ Letter stating the offertory amount of the stipend (yearly/monthly)
<b>Unemployment Compensation</b>	<p>Notice of financial determination Unemployment printout – <a href="http://www.uc.pa.gov">www.uc.pa.gov</a> Bank statement from last 30 days</p>
<p><b>Veterans Benefits</b></p> <p><i>Veteran's Income</i></p>	<p>Letter from VA Benefit statement (current year) Bank Statement from last 30 days</p>
<p><b>Workman's Compensation</b></p> <p><i>Worker's Comp</i></p>	<p>Letter of determination Benefits statement from last 30 days Copy of checks (last 30 days) Bank statement from last 30 days</p>
<b>Zero Income</b>	Zero Income Form

**ZERO INCOME CLAIM FORM**

**CUSTOMER INFORMATION:**

ACCOUNT NUMBER: \_\_\_\_\_

FIRST NAME \_\_\_\_\_ LAST NAME \_\_\_\_\_

ADDRESS 1 \_\_\_\_\_

ADDRESS 2 \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ PA \_\_\_\_\_ ZIP \_\_\_\_\_

**HOUSEHOLD ZERO INCOME CLAIM:**

I, \_\_\_\_\_, confirm/state that no adult member of  
(print name)  
my household is currently receiving income from any source.

**Household Expenses:**

Identify how you and your household meet monthly living expenses, such as those expenses for housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone bill). Check all that apply.

\_\_\_\_\_ I am using money from savings

\_\_\_\_\_ I receive financial support from friends/family/community

\_\_\_\_\_ Other. Please explain below:

**Affidavit:**

I certify that the information presented in this application is true and accurate to the best of my knowledge. I understand that providing false information in this application is grounds for denial and dismissal of my application. I acknowledge that I am responsible for notifying **Dollar Energy Fund** if my household or income information changes.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

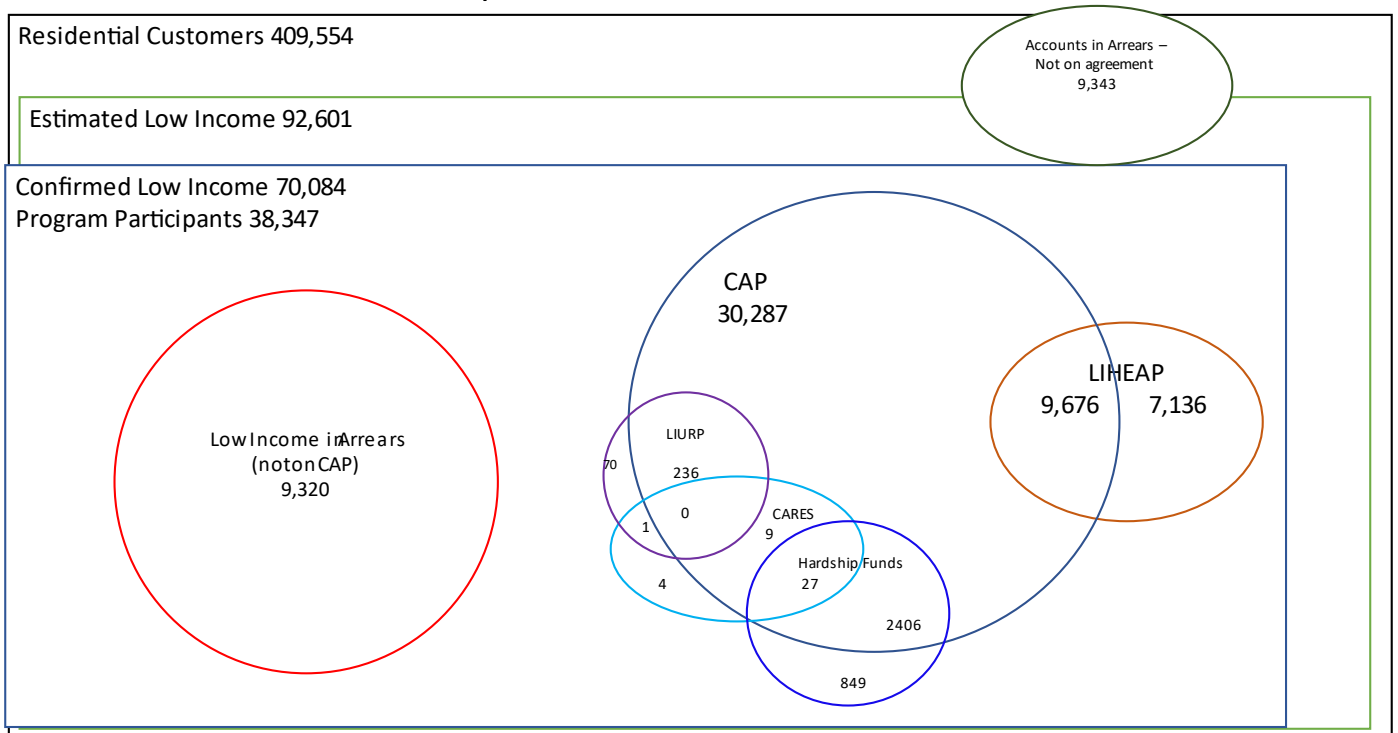
Columbia Gas of Pennsylvania  
Customer Outreach & Education Plan

## Overview

**Columbia's menu of programs** is designed in a coordinated effort to provide the greatest benefit to all customers in need of assistance in a cost-effective manner. Therefore, most outreach opportunities promote more than just one program. Columbia promotes its Universal Service programs and engages in external outreach opportunities throughout its service territory. In addition, the Universal Service Department conducts internal outreach activities to inform employees and create additional ambassadors of the Universal Services portfolio of services. Columbia adjusts its outreach at least yearly, based on current need, review of past practice results and consideration of new opportunities that are presented as they are presented. Customers eligible for one program are encouraged to apply for all programs that they may be eligible.

A snapshot of current data in 2022 data presented the following graph of participation.

### Customer Participation



## Target audiences identified

Spanish Speaking Population	Check Cashing Store Customers
Single Head of Households	Visiting Nurses patient
Landlords	Transitional Services Recipients
Veterans	People who are unemployed
School District Parents/children	Customers with Heating
Head Start Participants	Emergencies
Food Bank recipients	People with Disabilities
Housing Authority residents	Seniors
Customers below 50% of FPIG	
New Customers/Home Buyers	

## External Outreach

All Programs: There are multiple opportunities for the Company to promote all programs during the year.

- Sponsorship and participation in senior fairs and legislative events
- Representation on local community assistance boards and task forces
- Participation and coordination of Be Utility Wise events
- Provision of all program information on Columbia website
- Promotion of programs through multiple Company social media channels and Next Door
- Semi-annual Universal Service Advisory Council meetings
- Customer Care Center referrals
- Press Releases at the start of the winter heating season & throughout the year
- Promotion of programs to Community Engagement partnering agencies
- Targeted agency training
- Community Sponsored events such as trunk or **treats, school fairs and resource expo's**
- Food Bank Distribution sites
- School District information dissemination
- Virtual Annual Training for legislative aides and Social Service /Representatives
- 

Columbia also sponsors outreach opportunities to support Universal Service programs on an individual program basis:

### CAP

- Coordination with electric utilities to solicit CAP customers for re-verification
- Coordination with the Dollar Energy Fund Grant Program for re-verification
- Solicitation of targeted groups
  - CRISIS recipients
  - Inactive account customers (Cold Weather Survey packets)
  - Targeted outreach for customers below 50% of FPIG

- Annual bill inserts requesting contributions and encouraging application
- Monthly solicitation on bills to all non-CAP residential customers with current accounts
- Participation in multiple fundraising events
- Link to make a donation to all customers receiving e-bills
- Social Media posting of fundraising events
- Social Media posting of how to access funds
- Application processing for vulnerable customers

## LIHEAP

- Press releases
- Social Media paid ads
- Newspaper/Community Magazine ads
- Ads in Spanish in certain geographic areas
- Bill inserts promoting LIHEAP
- Mail applications upon request or referred by CSR
- Application completion for vulnerable customers
- Inserts promoting CRISIS in eligible termination notices
- Outbound calls to previous recipients reminding them to apply
- Outbound calls to identified eligible customers and CAP customers
- Operation of a toll-free hotline for inquiries and assistance with applications
- Outbound emails to Crisis-eligible customers as part of Direct Referral Process
- Outbound emails to potentially eligible customers
- 

## WarmWise Programs (Energy Efficiency)

- media buy annually based on consumer trends
- Reciprocal referrals between programs depending on eligibility
- Social Media paid ads promoting programs

## Targeted Population Outreach

### Spanish Speaking Population

- Outreach to existing Hispanic/Latino groups
- Media buys in Spanish
- Information in Spanish on website
- Materials & program specific letters provided in Spanish
- CARES one on one intervention

### Victims of Domestic Violence

- Representation on Universal Service Advisory Council (USAC)
- CARES involvement with all identified Victims of Domestic Violence
- Confidential access and storage of records
- Protection of accounts from traditional Chapter 14 collections

### Landlords

- CARES intervention to encourage LIURP participation
- Brochure designed to explain LIURP sent to all Landlords during LIURP referral process

### Seniors

- Advertorials and ads in Senior News
- Representation at Senior Fairs/Legislative events
- Targeted for Heat Wise participation

- Additional review/contact for senior cold weather survey customers including referrals to Area Agency on Aging local offices
- Senior Groups/Training
- Representation on USAC

#### Veterans

- Outreach with targeted organizations
- Targeted for Heat Wise participation
- Representation on USAC

#### Train the Trainer Session and/or Information provided

- Head Start
- Visiting Nurses organizations
- Transitional Services
- **Homeowner's trainings**
- Unemployment Offices/Vocational Rehab centers
- Faith Based
- Other Community Agencies

#### People with Disabilities

- Outreach with community agencies that serve population

#### People with income 50% of FPIG and lower

- Targeted emails
- Emphasis on geographic areas with high percentage of population

#### Information Provided

- School Districts
- Food Banks
- Check Cashing Businesses
- Head Start
- Back Pack Distribution
- Area Agency on Aging
- Meals on Wheels
- Other Community Agencies

### Internal Outreach

The Company recognizes the value of employee ambassadors for promoting programs to customers, neighbors, family and community groups. Therefore, the Universal Service Department engages in multiple activities to promote programs internally.

- Call Aid Scripting
  - Detailed explanation of each program including guidelines, application process and benefits
  - Reminders to refer to programs at appropriate points in the scripting such as reconnects, payment arrangement requests, high bill complaints
  - Up to the minute dates, income guidelines, eligibility guidelines, agency partners hours and contact information
- Training
  - Customer Care Center Customer Service Representatives
  - Administrating and screening agencies
  - Service department personnel

- Construction services personnel
- Lunch and Learn with office staff
- Company Internal website articles about programs, contest winners, customer testimonials
- Contests at CCC while LIHEAP/CRISIS are open to encourage referrals

#### Meetings

- Monthly CAP team meeting with administrator,
- Universal Services Staff monthly meeting
- Universal Services Advisory Council Bi-Annual meeting
- Cold Weather Survey update meeting prior to survey annually
- Monthly meetings between CCC staff and Universal Services to provide updates and discuss current trends/concerns
- Monthly meeting with A & R, ERP and LIURP post inspection staff
- Meetings with local area office staff to update on programs

## Education

Columbia blends outreach with education. The best form of promotion is to help a potential customer understand the benefits and how to access the program. However there are specific education components to specific programs the Company has developed.

### LIURP

The Company provides a welcome packet that includes information about behavioral energy efficiency measures. It includes a pop up house that can be used by auditors to demonstrate what will be done over the next few weeks to help reduce energy in the home. It is especially useful for customers that cannot walk through with the auditor. It also includes contact information and a summary of the LIURP process.

The Company provides a written pamphlet to landlords explaining the benefits of the program.

### CAP

All CAP enrollees are provided a copy of their agreement form which includes all responsibilities and explanation of benefits of the CAP program.

### CCC

Our customer care center representatives are trained to help customers understand what programs would be the most beneficial for them and then guide them through the process of applying. These representatives are trained to identify and address any underlying payment problems in addition to the identifying concern. The representatives also make referrals to community resources as needed.

### CARES

Our Customer Outreach and Education Coordinators can take CAP and Hardship Fund applications as needed. In addition, they assist all customers to apply for programs. Coordinators also provide referrals to community resources as needed.

	Program	Internal	External
<b>All Year</b>	<ul style="list-style-type: none"> <li>• WarmWise Audits &amp; Rebates (A &amp; R)</li> <li>• Customer Assistance Program (CAP)</li> <li>• Emergency Repair Program (ERP)</li> <li>• Warm Wise Low Income Reduction Program (LIURP)</li> <li>• Security Deposit Assistance Fund (SDAF)</li> <li>• Low Income Home Energy Assistance Program (LIHEAP)</li> <li>• Hardship Funds</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Service Representative have current information as part of scripting and resource center</li> </ul>	<ul style="list-style-type: none"> <li>• Packets Distributed through Warm Wise Energy Efficiency Program</li> <li>• Materials Distributed through Senior Fairs &amp; Community Events</li> <li>• Current information on website including application sites, income guidelines, benefit levels</li> <li>• Solicit donations to Hardship Funds on paper &amp; ebills.</li> <li>• Information shared at Food Bank Distribution Sites</li> <li>• Grass Roots outreach to at risk communities</li> </ul>
<b>January</b>	All Programs Hardship Funds	Updated Income Guidelines to CSR's with FPIG changes & push for referrals	Press Release Social Media Posts Cool Down for Warmth Fundraiser
<b>February</b>	A & R LIURP Hardship Funds  LIHEAP CRISIS	Updated Guidelines provided to CSR's  Utility File transfer Campaign On going LIHEAP contest to encourage referrals	Media Campaign promoting LIURP & A & R Warmathon Fundraiser & related social media posts Social Media posts Emails to customers on UFT Email to customers re: CRISIS Bill Insert on CRISIS
<b>March</b>	A & R/LIURP LIHEAP/CRISIS	Reminders to CSR's LIHEAP/CRISIS final push	Media Campaign Social Media Posts program open & closing dates Bill Insert for CRISIS

<b>April</b>	CRISIS Dollar Energy Fund All programs	UFT final push with CSR's Reminder Hardship fund is open & available when LIHEAP closes	Final e-mail to customers for UFT program Social Media Posts with We're here to Help messaging
<b>May</b>	LIHEAP/CRISIS All programs		Social media posts
<b>August</b>	Heat Wise Dollar Energy Fund	Reminder of Heat Wise program benefits to CSR's	Emails to Contractors re Heat Wise Bill Insert to Customers for Heat Wise DEF Golf tournament
<b>September</b>	All Programs	Review Program guidelines with field employees	Be Utility Wise Event in Pittsburgh Area Senior Fairs attendance increases Virtual Town Hall for legislative offices and <u>community based</u> organizations
<b>October</b>	LIURP/A & R  Hardship Funds All programs  LIHEAP/CRISIS	Internal Promotion of Energy Efficiency Day  Reminders program opens this month  LIHEAP kick off with call center staff Start of internal contest promoting referrals	Media Campaign to promote Energy Efficiency Social Media Posts about EE day Press Release Opening of Hardship Funds Be Utility Wise events in central pa & Johnstown Senior & Legislative Fair attendance increases
<b>November</b>	LIHEAP/CRISIS	New guidelines explained & updated to CSR's. Announce program opening	Press Release on Opening Day Highlighted information on website Emails to eligible customers Emails to potentially eligible customers Bill Insert
<b>December</b>	Hardship Funds		Bill Insert soliciting donations

**Columbia Gas of Pennsylvania, Inc.**

**Universal Service**

**And**

**Energy Conservation Plan**

**2024- 2028**

# Table of Contents

Plan Submission.....	4
Historic Overview .....	4
Modifications to the Plan for 2024 - 2028.....	12
Integration .....	12
Outreach .....	14
Staffing.....	14
Universal Service Program Responsibilities .....	14
Budgets.....	17
Program Descriptions .....	18
CARES (Customer Assistance Referral and Evaluation Services) Scope .....	18
Key Objectives .....	19
Eligibility Criteria.....	19
Program Components.....	20
Victims of Domestic Abuse Policy .....	20
LIURP (Low Income Usage Reduction Program) Scope .....	20
Key Objectives .....	20
Eligibility Criteria.....	21
Program Components.....	21
Key Objectives.....	23
Eligibility .....	24
Program Components .....	24
Projected Enrollment.....	25
HARDSHIP FUND .....	25
Key Objectives .....	25
Eligibility Criteria.....	25
Treatment of CAP Customers .....	26
Program Components.....	26
Fundraising .....	26
CAP (CUSTOMER ASSISTANCE PROGRAM).....	27
Key Objectives .....	27
Eligibility Criteria.....	28
Program Components Administration .....	28
Intake and Enrollment.....	29
Customer Responsibilities.....	30

Usage Controls .....	30
Transfer of Service.....	31
Default Provisions .....	31
Default Provisions for Nonpayment of CAP Budgets .....	31
Default Provisions for Customers Requesting Removal from CAP .....	32
Default Provisions for Customers with High Consumption .....	32
Re-connect Procedures .....	<del>32</del> <u>33</u>
Security Deposits .....	33
Reconnection fees & Late fees.....	33
Re-instatement.....	33
CAP Balance Clarification for re-entry into CAP less than four years from removal date .....	34
CAP Re-instatement for Customers out of CAP for four years or more .....	34
Re-verification .....	34
Arrearage Retirement.....	35
Universal Service Needs Assessment.....	35
Projected Enrollment .....	39
LIURP Health & Safety Study.....	Attachment A
CAP Customer Agreement Form.....	Attachment B
Acceptable Income for CAP.....	Attachment C
Zero Income Form.....	Attachment D
Customer Outreach & Education Plan.....	Attachment E

# **Columbia Gas of Pennsylvania, Inc.**

## **Universal Service and Energy Conservation Plan**

### **Plan Submission**

Section 62.4 of the Pennsylvania Public Utility Commission's ("Commission") regulations requires natural gas distribution companies to file updated Universal Service and Energy Conservation Plans every three years. 52 Pa. Code § 62.4. On June 27, 2014, by Secretarial Letter, the Commission notified Columbia Gas of Pennsylvania, Inc. ("Columbia" or the "Company") of a new plan submission schedule. Columbia hereby submits its Universal Service and Energy Conservation Plan for plan years 2024 through 2028.

As Universal Service includes energy efficiency programs such as the Low Income Usage Reduction Program ("LIURP"), individual universal service and energy conservation programs referenced herein will be referred to as "Universal Service," and the Universal Service and Energy Conservation Plan will be referenced as the "Plan" or the "Universal Service and Energy Conservation Plan."

### **Historic Overview**

Columbia submitted its first Universal Service and Energy Conservation Plan in August 1999, as part of its Restructuring Filing as required by the Natural Gas CHOICE and Competition Act in Case No. R-00994781. 66 Pa.C.S. Chapter 22. The Commission approved the Plan as part of settlement agreements from Case No. R-00994781 in October and December of 1999. Provisions within those settlements included an enrollment target for the Customer Assistance Program ("CAP") and a funding level for LIURP. Additionally, the approved settlements provided for a temporary funding source for Columbia's Universal Service Program with the expectation that a permanent funding mechanism would be developed later. The Commission approved modifications to Columbia's CAP funding mechanism in 2001 and 2002.

Columbia submitted its second Universal Service and Energy Conservation Plan in November 2002 (for the years 2003 through 2005), which the Commission approved in January 2003. In October 2003, Columbia received Commission approval for a permanent CAP funding mechanism, which allowed for recovery of projected shortfall and application costs, based upon the current and estimated customers in the program and the cost of gas. The mechanism is part of the pass-through charge on customer bills and is adjusted at the same time as the quarterly gas cost adjustment.

In 2005, Columbia submitted its third Universal Service and Energy Conservation Plan (for years 2006 through 2008), which the Commission approved in January 2006. It included the establishment of a remedial conservation education program for high consumption CAP customers who had already received weatherization services, along

with an external evaluation of its LIURP program. Funding and enrollment remained consistent with the previously approved plan from 2003.

In 2008, Columbia filed its fourth Universal Service and Energy Conservation Plan for years 2009-2011 as part of its base rate case at Docket No. R-2008-2011621. The Plan was approved as part of the settlement of that case. The approved plan featured an increase in LIURP spending from \$1,700,000 to \$3,000,000.

In August 2010, Columbia filed a Petition to Modify its 2009-2011 Plan in order to implement the "CAP Plus" program. (Docket No. P-2010-2195759) The Commission approved Columbia's Petition in October 2010 and Columbia implemented CAP Plus in November 2010. Under CAP Plus, CAP participants are billed an applicable "Asked to Pay" amount, as well as an additional "Plus" amount that is intended to balance affordability for CAP customers and cost responsibility for non-CAP customers. The Plus amount is currently calculated as follows: (total Low Income Home Energy Assistance Program ("LIHEAP") receivables from the prior heating season divided by the number of active CAP participants at the start of the current LIHEAP season divided by 12.) As of the date of this filing, Columbia's CAP is based on the CAP Plus model approved in Docket No. P-2010-2195759.

Also, in the third quarter of 2010, Columbia secured the services of an independent third-party consultant to perform a comprehensive impact evaluation of Columbia's Universal Service Programs. In November 2010, Columbia filed its independent evaluation of the Universal Service Programs. The independent evaluator, Melanie Popovich, noted that "throughout this document, the evaluator makes note of the proactive approach taken by the Company's management team in order to address the barriers to program effectiveness. The Company is to be commended on its willingness to engage third party experts to undergo external studies for further program improvement. ... In my opinion as an evaluator, Columbia strives for continuous improvement and has one of the most efficient and effectively managed Universal Service Programs in the state."

In 2011, as part of the approved settlement of its rate case proceeding at Docket No. R-2010-2215623, Columbia agreed to increase its LIURP budget from \$3,000,000 to \$4,000,000. One party to that proceeding, the Pennsylvania Communities Organizing for Change d/b/a ACTION United ("PCOC"), challenged Columbia's CAP Plus program. Specifically, PCOC alleged that the Company's CAP Plus program did not comply with the Pennsylvania Department of Welfare requirements or Federal law. The Commission denied PCOC's challenge to Columbia's CAP Plus, and PCOC appealed the matter to the Pennsylvania Commonwealth Court. On April 10, 2014, the Commonwealth Court affirmed the Commission's decision approving Columbia's CAP Plus program.

On September 28, 2012, Columbia filed a base rate proceeding under Docket No. R-2012-2321748. In 2013, the parties to that proceeding submitted a partial settlement for the Commission's approval, which featured an increase in LIURP funding from \$4,000,000 to \$4,500,000 and the cancellation of Columbia's agreement with Citizen's

Energy Corporation which had generated \$375,000 for Columbia's Fuel Fund, but which was only being recovered from Columbia's Purchased Gas Cost residential customers. The settlement provided for replacement of the proceeds of the Citizens Energy transaction with a \$375,000 increase to the Rider Universal Service Plan ("USP").

On March 21, 2014, Columbia filed a base rate proceeding under Docket No. R-2014-2406274. In December 2014, the Commission approved a settlement which included an increase in LIURP funding from \$4,500,000 to \$4,750,000.

On June 27, 2014, the Commission issued a Secretarial Letter to all energy utilities establishing a revised USECP filing schedule. As part of the new filing schedule, Columbia's then-pending proposed USECP for the plan period 2015 through 2017 would extend to include 2018. On January 16, 2015, Columbia filed and served an amended proposed USECP for 2015 through 2018. The Commission approved Columbia's amended plan for the years 2015 through 2018 on July 8, 2015.

On March 19, 2015, Columbia filed a base rate proceeding under Docket No. R- 2015-2468056. The Commission approved a settlement provision which allowed CAP's third-party administrative costs to be recovered through the Rider USP and the establishment of a Universal Service Advisory Council ("USAC").

In March 2016, Columbia filed a base rate proceeding under Docket No. R-2016-2529660. The parties agreed to allow Columbia to use the residential portion of federal pipeline credits and refunds collected by Columbia to fund the Hardship Fund. Columbia also agreed to continue to develop plans to increase donations to the Dollar Energy Fund in conjunction with its USAC. Further, Columbia agreed to report on any and all fundraising efforts as a part of the settlement. In addition, Columbia agreed to offset the Universal Service Rider by 7.5% for each customer enrolled over the average annual participation level of 23,000. The offset reflects anticipated savings in operation and maintenance costs gained when a customer participates in CAP.

On February 28, 2018, Columbia filed a petition under Docket No. P-2018-3000160 seeking approval to use federal pipeline penalty credits and refunds to permanently support its residential Hardship Fund. On June 14, 2018, the Commission approved Columbia's petition authorizing Columbia to use federal pipeline penalty credits and refunds to fund its Hardship Fund. Further, the Commission's order allows Columbia to maintain a Hardship Fund balance of up to \$750,000. If Columbia's penalty credit and refund balance is more than \$750,000, Columbia will flow the residential portion of the excess credit and refund balance to its residential customers. Columbia will continue to seek opportunities to raise funds to support its Hardship Fund. These provisions were added to Columbia's 2019-2023 USECP in the compliance filing of November 25, 2019.

In March 2018, Columbia filed a base rate proceeding under Docket No. R-2018-2647577. The Commission approved a partial settlement, which included a provision for increased LIURP funding by \$125,000 beginning in the year 2020. Any unspent funds at the end of the year will be rolled over and added to the LIURP budget for the following

year. Additionally, Columbia agreed to design and implement a process for electronic income verification for the CAP program by January 2020. Further, Columbia and the other parties agreed to discuss issues, including but not limited to, budget billing plans, high CAP credits and CAP payment plan options within Columbia's USAC. These provisions were added to Columbia's 2019-2023 USECP in the compliance filing of November 25, 2019.

By Order dated August 8, 2019, the Commission approved Columbia's USECP plan for 2019 – 2021 and directed certain changes, including the following:

- Include language that customers do not have to apply for LIHEAP as a condition of CAP eligibility.
- Define "household income" as it specifically relates to CAP Eligibility Criteria;
- Require verification of income at a minimum of every three years for customers that receive LIHEAP, Dollar Energy Fund ("DEF") or another Columbia universal service program;
- Reverify customers' reporting zero income every six months;
- Clarify that a mail-in application for CAP is available and acceptable in addition to telephonic and in person applications;
- Implement an online CAP application that also permits electronic submission of documentation no later than December 1, 2020;
- Eliminate any requirement for in-person CAP applications;
- Explain and clarify how the Remedial Energy Efficiency Program ("REEP") contractors formulate their program recommendations;
- Define "extenuating circumstances" as it relates to customers voluntarily leaving CAP and being able to re-enroll before the one-year stay-out provision expires. Clarify that a former CAP customer with no outstanding arrears that requests re-enrollment will be allowed back into CAP subject to CAP eligibility and enrollment requirements.
- Customers re-enrolling in CAP after four years are treated as never having been in CAP;
- Senior CAP payment plan is eliminated.
- Clarify that the cost of natural gas is not factored into Columbia's CAP or LIURP shortfall;
- Clarify that a \$500 DEF grant, regardless of balance owed, will be accepted as sufficient to end a termination or to restore service;
- Include the supplemental explanation of how the Universal Service Rider offset is calculated;
- Identify Community Based Organizations that provide LIURP weatherization services;
- Implement Inoperable Heating Systems Pilot as part of the Company's LIURP program; and

- Implementation of a Health & Safety Pilot as part of the Company's LIURP program.

On August 23, 2019, Columbia filed a Petition for Reconsideration of the online CAP application requirement and the requirement that CAP customers participate in LIHEAP. On November 14, 2019, the PUC granted the Petition in part and denied it in part. The PUC denied the Petition with regard to the online CAP application. The PUC granted the Petition with regard to the LIHEAP participation requirement and provided clarification thereof.

Consistent with the PUC's August 8 and November 14, 2019, Orders, Columbia filed its Revised USECP 2019-2021 Plan on November 25, 2019. By Order dated January 16, 2020, the Commission approved the November 25, 2019 Revised Compliance Filing.

Pursuant to the PUC Order of October 3, 2019, at Docket No. M-2019-3012601, on January 6, 2020, Columbia filed updated USP enrollment and budget projections for 2022 and 2023. By Order dated January 16, 2020, the PUC determined that Columbia's 2019-2021 USECP could be effective through 2023 and updated the caption accordingly.

In March 2021, Columbia filed a base rate proceeding under Docket No. R-2021-3024296. The Commission approved a settlement on December 16, 2021, which included the following provisions related to universal service:

- Expand the Emergency Repair Fund from \$600,000 to \$700,000 per year for years 2022 and 2023;
- Develop remedies for CAP exits relating to the failure to recertify and report to BCS the affirmative steps taken to reduce the exits for failure to recertify within 60 days of the PUC's order approving the settlement. The report was provided to BCS on February 14, 2022;
- Target Outreach and Case Management Pilot to promote existing programs and resources to customers below 50% of the federal poverty level and not enrolled in USP programs. The Company was permitted to recover the cost of the Pilot through Rider USP not to exceed \$200,000. This Pilot was implemented for the duration of 2022;
- Increase funding for the Health & Safety Pilot from \$200,000 to \$400,000 in 2022 and extend the Pilot until the approval of the Company's next USECP, with a maximum budget of \$600,000 per year if homes are available and in need of the Pilot services. The Company will modify the formula to include savings associated with CAP credits;
- The Company increased the LIURP budget by \$200,000 for a current annual budget of \$5,075,000;
- With regard to the carryover LIURP funding from 2020, the Company will canvas participating Community Based Organizations ("CBOs") to determine if they have capacity to do additional work and increase LIURP allocations to affirmatively responding CBOs who are on track to meet their existing allocations;
- Amend tariff to indicate that all "confirmed low-income customers" as reported in the PUC's Universal Service Report ("USR") with income at or below 150% FPL

will not be charged a security deposit and refund all deposits being held for “confirmed low-income customers” as reported in the PUC’s USR within 60 days; and

- Review security deposits on a semi-annual basis and issue a bill credit or refund for any security deposit previously collected from a confirmed low-income customer.
  
- In March 2022, Columbia filed a base rate proceeding under Docket No. R-2022-3031211. The Commission approved a partial settlement on December 8, 2022, with the following provisions regarding universal service: Spread any remaining LIURP balance from 2022 evenly over the years 2023, 2024 and 2025;
  - LIURP will be increased from \$5,075,000 to \$5,425,000 in beginning in January 2024 or sooner if carryover results in a year’s annual budget being less than \$5,425,000. The LIURP budget will remain at \$5,075,000 until the increase takes effect. The Company will expend the 2022 LIURP budget carryover before adjusting the Rider USP for the increase;
  - The Company will continue to partner with CBOs in the development, implementation and administration of its LIURP.
  
- A one-time donation of \$75,000 was made by shareholders to the Company’s Hardship Fund for the 2022 -2023 program year;
  
- The Company will conduct quarterly reviews of all CAP accounts to ensure the customers are getting the lowest CAP rate available to them. By December 31, 2023, Columbia will implement an automated process to conduct this quarterly review. IT costs related to the automation process will be recovered through Rider USP. By July 30, 2023, the Company will file a progress report explaining its progress toward implementing the automated process; and

## Program Evolution

The Company endeavors to react proactively to external factors and to improve efficiencies and processes. The chart below itemizes the program updates highlighted above, as well as temporary modifications in response to the COVID-19 pandemic.

Date Implemented	Customer Assistance Referral and Evaluation Services (CARES)	Low Income Usage Reduction Program (LIURP)	Hardship Funds	Customer Assistance Program (CAP)
2/1/2020				Paper Application Offered

4/1/2020	New CARES rep focusing on Outreach. Change in staffing from One US liaison and two EA Specialists to three EA Specialists to help with call volume in peak LIHEAP season			
4/1/2020	Development & review of Outreach Plan with USAC	Stopped removing customers from CAP for failing to cooperate with LIURP - COVID response		Stopped removing customers from CAP for failing to verify income until April 2022 - COVID response
7/1/2020	Wellness calls to elderly, living alone - COVID response	Health & Safety Pilot Initiated		Removed requirement to provide income to enroll in CAP - COVID response
10/1/2020			Opened enrollment to active CAP customers - COVID response	
10/1/2020	First annual Virtual Town hall for legislative office and CBO personnel to educate on all available resources & programs			
12/1/2020			Expanded hardship Fund guidelines to 300% and increased shareholder contribution by \$400,000 - COVID Response	
12/30/2020			On-Line Application went live	On- Line Application went live
2/1/2021	First of a now annual email to CRISIS eligible recipients that only require a positive response to apply for CRISIS on their behalf was sent			
4/1/2021				Revised re-entry process to start CAP customers over if out for more than 4 years. No CAP catch up amount required
10/28/2021	Shared & revised outreach plan based on feedback at USAC			

10/1/2021	Disseminated information to eight school districts to promote programs based on feedback from USAC outreach plan review			
1/1/2022		Increase LIURP by \$200,000		
1/1/2022		Expand Health & Safety Pilot to increase eligible pool and maximum H & S allocation		
2/1/2022				Began accepting income via email
4/1/2022	Increased outreach campaign using digital and TV ads to promote programs. Run in April and 4th Qtr			Pilot case management to enroll customers 0 - 50 % FPIG in CAP & accompanying outreach efforts.
4/1/2022				Zero Income reverification changed to every 6 months and reverification if only LIHEAP every 3 years
6/1/2022				Off cycle review of CAP accts to lower pp's due to higher budget calculations
11/1/2022				Developed partnership with state immigration office/local agencies to facilitate service connection and enter clients into CAP
1/1/2023		Spread remaining LIURP funds resulting from Covid underspend over three years, (2023, 2024 & 2025) with a minimum spend of \$5,425,000		
12/30/2022			One time \$75,000 donation to Hardship Funds	
2/15/2023		Updated letters to assist Spanish Speaking customers providing a direct line		
12/30/2023				Automate Quarterly reviews of CAP accounts to determine and execute on lowest payment option

## **Modifications to the Plan for 2024 - 2028**

- I. Staff shifting to improve efficiencies of the LIHEAP team and to provide more emphasis on grassroots outreach, as more fully explained below.
- II. Customer Assistance Program Changes
  - Establish updated payment plan options to align with the energy burden updates in the 2020 CAP Policy Statement docketed at M-2019-3012599;
  - Remove “payment-troubled” CAP qualification criteria to align with the 2020 CAP Policy Statement;
  - Cease charging co pays and CAP plus for all customers.
  - Update the reverification schedule as outlined in the 2020 CAP policy statement.
    - CAP households reporting no income will be required to recertify every six (6) months regardless of LIHEAP participation;
    - CAP households with income that participate in LIHEAP annually will be required to recertify once every three (3) years;
    - CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions will be required to recertify every three (3) years; and
    - All other CAP households will be required to recertify every two (2) years.
  - Quarterly review of all CAP accounts with automatic selection to lowest payment option available for which the customer is eligible;
  - Eliminate CAP aggregation for supply of gas due to lack of interest by suppliers;
  - Eliminate Remedial Energy Efficiency Program; and
  - Provide energy efficiency tips and survey to be completed by all CAP customers with shortfall over \$1500 annually to determine reason for high usage.
  - Modify the Customer Agreement form. See Attachment B
- III. LIURP Changes
  - Increase Health & Safety spending on every home from \$650 maximum to \$1,200 due to higher costs of materials and labor; and
  - Terminate the Inoperable Heating Systems Pilot due to lack of use.

## **Integration**

Columbia continues to use an integrated approach for outreach and solicitation for all Universal Service programs, focusing on two primary strategies: first, Columbia incorporates referrals into existing processes, and second, Columbia coordinates services with dedicated staff.

Columbia uses existing customer services processes, such as the Cold Weather Survey, collection, compliance, energy assistance receipts, grass roots outreach, social media and other marketing campaigns and contact management to create opportunities to increase enrollment in Universal Service programs.

All of Columbia's Contact Center staff are dedicated to the promotion of and enrollment in Universal Service programs. Customers are referred to all available and appropriate programs including, but not limited to, CAP, LIURP, CARES, energy assistance, hardship funds. In addition, Columbia's trained representatives refer eligible customers to non-utility assistance programs such as earned income credits, food banks and community-based agencies including 211.

When a customer is identified as payment-troubled or low income during a contact with the Company, the customer is notified of all available programs. The customer can also be pre-screened for the CAP program and immediately transferred to Columbia's third-party administrator for CAP enrollment. This "one-stop-shop" approach is administratively efficient because it identifies which programs are appropriate for the customer at the initial, single point of contact.

Columbia prioritizes CAP customers for LIURP benefits to reduce future consumption and shortfall. This coordination occurs at the time of referral at the Contact Center. As a result, only one application is needed to apply for both CAP and LIURP.

Columbia reviews all CAP customers with more than \$1,000 in annual shortfall for LIURP at the beginning of each year. Throughout the year, newly enrolled CAP customers are also screened for LIURP.

All customers referred to or requesting Emergency Repair Program ("ERP") funds, Audits and Rebates program benefits or LIURP benefits are screened to determine the program that can provide the highest level of benefit. Staff notify the customer and the appropriate program staff at the same time to guarantee the highest benefit level and quickest response. In addition, this approach allows Columbia to increase LIURP enrollment while reducing costs to the ERP and Audits and Rebates Program, which have lower funding levels. Further, customers participating in the Audits and Rebates Program are automatically considered for the ERP if the customer is need of repairs covered under the ERP.

LIURP contractors are encouraged to leverage county and other utility program funding on all completions. The coordination of LIURP programs provides a seamless experience for the customer while maximizing benefits.

CAP staff, LIURP staff as well as LIURP contractors contact the CARES department directly for all cases needing one-on-one intervention and/or Spanish translation.

## Outreach

Columbia promotes its Universal Service programs and engages in external outreach opportunities throughout its service territory. Since 2020, Columbia has reviewed its outreach strategy and efforts with its USAC at every meeting. The USAC has helped to expand opportunities for the Company to explore. Please see the Attachment D for the outreach and education plan. This plan reflects an evolving process that will be modified and enhanced as needed within the duration of the 2024 USECP.

## Staffing

Columbia utilizes the resources of staff employees along with the experts of community partners to implement all of its Universal Service programs.

## **Universal Service Program Responsibilities**

Director, Rates and Regulatory Affairs	Strategic direction of all programs/policies
Manager, Universal Service	Implementation/compliance of all programs
Program Administrator	Program reporting for all programs
Coordinator Customer/Community Outreach and Education (2)	Grass roots outreach for all programs One-on-one case management for vulnerable and special needs customers
Columbia Customer Contact Center	Provision of information on, referrals to and enrollment in all programs
Energy Assistance Team Leader	Day-to-day compliance of LIHEAP vendor agreements, reconciliation of LIHEAP receipts
Energy Assistance Specialist (3)	LIHEAP hotline response, customer payment postings and response to customer inquiries Coordination of Fuel Fund and CAP processes and agencies for grants and applications
Quality Assurance Coordinator	Implementation of LIURP quality assurance program and daily troubleshooting
Weatherization Specialist	Coordination of LIURP process flow from referral through completion to post inspection

## **Community Partnerships**

Columbia partners with community organizations for both the delivery of universal service programs and feedback on program practices and policies.

<b>CAP</b>	
Columbia	Management
Columbia Customer Care Center	Information, referral and customer inquiry
Dollar Energy Fund, Inc.	Outreach and intake administration
Dollar Energy Screening Agencies	On-site applications and referrals
Individual Contractor	Energy efficiency/consumer education and quality assurance control
<b>LIURP</b>	
Columbia	Management, pre-screening, referrals and Quality Assurance
Columbia Customer Care Center	Information, referral and customer inquiry
11 Weatherization providers throughout Columbia's service territory (current list as of January 2023 subject to change) Not For Profit/CBO's <ul style="list-style-type: none"> <li>• South Central Community Action Agency</li> <li>• Community Action Partnership for Somerset County</li> <li>• Housing Authority of the County of Beaver</li> <li>• Action Housing</li> <li>• The Weatherization program of Fayette County</li> <li>• Lawrence County Community Action</li> </ul> For Profit Organizations <ul style="list-style-type: none"> <li>• Clearesult</li> <li>• Mincin Insulation</li> <li>• MT Tenny</li> <li>• Fitzsimmons Energy Auditing</li> <li>• Grindle Insulation</li> </ul>	Weatherization, customer communication and data tracking
Rebuilding Together Pittsburgh	Energy efficiency education/inspections
King Conservation Group	Energy efficiency education/inspections
<b>HARDSHIP FUNDS</b>	
Columbia	Management, enrollment and referral

Customer Care Center	Information and referral
Dollar Energy Fund, Inc.	Outreach and intake administration
Dollar Energy Fund Screening Agencies	Outreach and intake implementation
<b>CARES</b>	
Columbia	Management
Columbia Customer Care Center	Information, referral and customer inquiry
Community-based Organizations	Resource development

The list below reflects the positions held by Columbia's Universal Service team on various task forces, committees and boards within the communities that Columbia serves.

<u>Task Force, Committee or Board</u>	<u>Position</u>
Be Utility Wise (SW PA)	Member/Sponsor
Fayette County Human Service Council	Vice President
Beaver County Homeless/Housing Coalition	Member
Department of Community and Economic Development Weatherization Assistance Program Policy Advisory Council	Member
York County Hispanic Coalition	Member
Children's Aid Society	Member
Lehman Center	Member
Volunteer Center, United Way of York County	Team Member
Project Destiny Inc/Thrive 18 Resource Group	Member
Local Housing Options Team (LHOT), Multiple counties	Member
Big Brothers/Big Sisters Laurel Region	Fayette Recruiting Committee
Communities that Care Multi County	Member
MAGIC Greene County Human Service Council	Member
Council of Community Services	Member

## Budgets

Universal Service expenses are monitored and tracked specifically by each program with the exception of Hardship Funds. Because oversight of the Hardship Funds resides within the CARES program, all internal administrative expenses are included in the CARES budget.

	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>LIURP*</b>	<b>\$5,893,673</b>	<b>\$5,893,673</b>	<b>\$5,425,000</b>	<b>\$5,425,000</b>	<b>\$5,425,000</b>
<b>Emergency Repair Program*</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>	<b>\$1,000,000</b>
Energy Assistance Outreach and Processing	\$180,000	\$185,000	\$185,000	\$190,000	\$190,000
CARES Community Outreach	\$285,000	\$285,000	\$290,000	\$290,000	\$300,000
<b>CARES Total - Costs recovered through base rates</b>	<b>\$465,000</b>	<b>\$465,000</b>	<b>\$475,000</b>	<b>\$480,000</b>	<b>\$490,000</b>
CAP Administration and Applications**	\$760,000	\$800,000	\$810,000	\$820,000	\$830,000
Shortfall*	\$26,626,814	\$30,550,951	\$32,079,008	\$33,682,845	\$35,062,734
Arrearage Retirement*	\$3,682,580	\$4,274,414	\$4,671,232	\$4,627,260	\$4,473,358
<b>CAP Total</b>	<b>\$31,069,394</b>	<b>\$35,625,365</b>	<b>\$37,560,240</b>	<b>\$39,130,105</b>	<b>\$40,366,092</b>
<b>Hardship Funds</b>	<b>\$675,000</b>	<b>\$300,000</b>	<b>\$300,000</b>	<b>\$300,000</b>	<b>\$300,000</b>
<b>Hardship Administrative Costs</b>	<b>\$74,250</b>	<b>\$31,000</b>	<b>\$31,000</b>	<b>\$31,000</b>	<b>\$31,000</b>
<b>Total</b>	<b>\$39,177,317</b>	<b>\$43,315,038</b>	<b>\$44,791,240</b>	<b>\$46,366,105</b>	<b>\$47,612,092</b>
<b>Number of Residential Customers</b>	409,800	409,800	409,800	409,800	409,800
<b>Average Spending per Customer per month</b>	\$8.45	\$9.35	\$9.66	\$10.00	\$10.27

\* All costs recovered through Company's RIDER USP

\*\*all costs recovered through Companies' RIDER USP except internal labor

## **Universal Service Plan (USP) Rider Offset**

Columbia provides an offset to its USP Rider of 7.5% for each customer enrolled in CAP over the annual participation level of 23,000. This offset (*i.e.*, credit) will be calculated in

the following manner on a yearly basis:

- Sum the Total annual shortfall plus Total Annual Arrearage Forgiveness and divide by total number of customers in CAP to arrive at a per customer CAP cost.
- Multiply 23,000 by per customer CAP cost to determine 100% recovery for first 23,000 CAP customers.
- Subtract the 100% recovery from the sum of Total annual shortfall and Total annual arrearage forgiveness to determine the portion that should be offset.
- Multiply the portion to be offset by 7.5%. This equals the dollar amount not collected through the Rider as an offset.

## **Program Descriptions**

Pursuant to 52 Pa. Code § 62.4(b), the components of Columbia's Universal Service and Energy Conservation Plan are described in detail. The following are program descriptions, including eligibility criteria, needs assessments, and projected enrollment levels for the programs.

### **CARES (Customer Assistance Referral and Evaluation Services)**

#### **Scope**

CARES provides information and referrals on all programs and resources available to customers in need to the Customer Service Representatives at the Company's customer Contact Center. The CARES program also interacts with customers one-on-one to assist with payment troubles and hardships. CARES has been offered to Columbia customers since 1986. Since its inception, over 48,000 customers have received the assistance of staff social workers through resource referrals, consumer education, LIHEAP Outreach and affordable payment plans tailored to the customer's ability to pay. CARES is designed to be a short-term program for first-time payment-troubled customers who require energy assistance and other necessary resources and referrals.

In addition, CARES assists vulnerable CAP customers who need extra protection and account monitoring. It is also the final step in the Cold Weather Survey intervention process. Columbia's Customer/Community Outreach and Education Coordinators ("Coordinators") make additional attempts to contact customers aged sixty-two and over who are without heat. This intervention is continuous throughout the heating season.

Coordinators also oversee the handling and processing of all accounts protected under regulations governing customers with valid Protection from Abuse (“PFA”) orders.

The coordinators train Contact Center and service employees on available resources.

## **Key Objectives**

- Safe, sustained energy
- Customer self-sufficiency
- Resource development
- Successful payment recovery
- Continuous payment frequency
- Reduced credit/collection costs
- Identification and cost avoidance associated with crisis/safety issues
- Customer satisfaction
- Crisis intervention
- Reduced Commission complaints
- Community networking
- Goodwill

## **Eligibility Criteria**

CARES is designed to be a short-term or temporary program for residential-heat customers who must demonstrate one of the following scenarios:

- Payment-troubled customer, evidenced by missed payments or anticipated payment barriers due to a personal crisis that is likely to result in a financial hardship, i.e. situations involving medical, financial, employment, familial or psycho-social issues.
- Special-needs customer, evidenced by the onset of a crisis having a profound impact on an individual or family, i.e. sudden loss of income, divorce, major life-threatening illness, death of the wage earner, or service emergency during harsh weather.
- Vulnerable customer, defined as someone who possesses impaired intellect or mental health, extreme physical disability, or chronic mismanagement of finances that has the serious potential to interfere with good payment behavior. These vulnerable customers will have diminished capacity to take care of basic needs, make reasonably sound decisions, take responsibility for their own personal safety, or have barriers for communications with the outside world.
- Domestic abuse customer, with a valid and active PFA court order, who is trying to obtain or maintain gas service.
- Cold Weather Survey customer, aged sixty-two or older, who is without their regular gas service and is using space heaters such as kerosene, wood, coal, or electric.

## **Program Components**

- Case management approach to solving individual payment problems
- Home visit assessment when necessary
- Protection from service termination during program
- Short-term, affordable payment plans based on ability to pay and case specific options designed by the coordinators for each specific customer
- Budget counseling
- Referrals and linkage to community, state, and federal resources for direct and indirect monetary assistance
- Application processing as necessary
- Information dissemination and referrals
- Crisis intervention
- Oversight of accounts with active PFA orders

## **Victims of Domestic Abuse Policy**

The Company will accept a PFA order, or a court order issued by “a court of competent jurisdiction” in Pennsylvania that provides evidence of domestic violence. Columbia has a fax number and an email address that is only accessible by five of its employees for customers to submit PFAs or such court orders. When the Company receives a PFA or court order, the document is uploaded to a secure, password protected file on the Company’s server. Once a PFA or court order is received via the above process, the O&E Coordinator is notified that a new file has been uploaded to the secure server. The O&E Coordinator then follows up with the customer if additional information is needed, determines assistance, and monitors the customer’s account until the order expires.

## **LIURP (Low Income Usage Reduction Program)**

### **Scope**

Columbia has provided assistance to eligible households through its Low-Income Usage Reduction Program since 1988. Approximately 12,000 homes have been weatherized since that time. Consumption savings average between 20%-24%. Average 2022 program expenditure per home was \$11,488.95. In accordance with existing requirements, each measure installed is projected to have a 7-12 year payback.

### **Key Objectives**

- Safe, affordable energy for low-income customers
- Reduced uncollectible arrearages and write-offs

- Reduced consumption
- Affordable budgets/bills for customers
- Reduced CAP shortfall deficit through bill reduction
- Improved customer satisfaction
- Environmental awareness/protection
- Responsible energy use
- Improved quality of living

## **Eligibility Criteria**

- Columbia residential heating customer
- Customer must not have received full weatherization services in the past seven years at their current dwelling. Full weatherization services is defined by the Company as the installation of weatherization measures, excluding replacement/repair of heating systems, that would reasonably result in a minimum of 15% energy usage reduction from installed measures.
- Exceptions will be made to the seven-year criteria if a customer's usage is still over the minimum usage requirements (set forth below) after weatherization and if new measures can be installed that will reduce energy usage.
- 52 Pa. Code § 58.2 (relating to definitions) including non-CAP, low-income customers who otherwise meet the LIURP eligibility requirements.
- Homeowner or renter; renter must have property owner permission including a signed release.
- Average winter monthly consumption greater than 170 Therms.
- Waiver of consumption requirement for coordinated jobs with electric or county programs.
- Dwelling must be approved during audit to be in proper condition to weatherize and screened for Health & Safety pilot if obstacles exist.
- A premises may be disqualified or deferred if Columbia makes a determination that providing weatherization services would not meet the seven-to-twelve-year payback as in as defined in 52 Pa. Code Section §58.11.
- Customer must be at or below 150% of federal poverty guidelines.
- Up to 20% of annual budget eligible for special needs customers as defined in 52 Pa. Code Section § 58.2 (relating to definitions), including non-CAP customers who otherwise meet the LIURP eligibility requirements.

## **Program Components**

- Home Energy Audit. Each eligible home is audited to determine if the dwelling is in proper condition for weatherization. Weatherization measures are recommended at the time of the audit. Referrals to other housing development agencies for repair work are made, if necessary. Referrals to other utility weatherization programs are made, as necessary.
- Energy education provided concurrent with audit.
- Coordination with other utilities and weatherization programs to leverage funds and

increase customer satisfaction.

- Heating system is inspected, tuned and repaired as needed prior to weatherization treatment.
- Gas furnace may be upgraded to 95% efficiency or higher if deemed to be inefficient.
- Gas boiler systems may be upgraded to 85% efficiency or higher if deemed to be inefficient.
- Health and Safety allowance, defined as any measure necessary to make the heating system safe and operable up to \$1200.00,
- Examples of additional health & safety measures are as follows: roof repairs, knob and tube remediation, remediation of a faulty bath fan, vermiculite testing, gutter repair or other repairs to eliminate moisture in the basement, dryer venting corrections, replacement of a broken window or broken lock on a door, repair of a step leading to the basement or attic, and removal of mold if the moisture source has been resolved. In every instance, the Company works with the contractor and approves all health and safety measures prior to installation, this may include exceeding the \$1,200 limit if it is necessary in order to make the property safe.
- Weatherization measures are performed specific to audit recommendations. Treatment is determined based on highest efficiency results. Measures include sidewall and attic insulation, blower door guided air sealing measures such as caulking, sealing and window stripping.
- Carbon Monoxide detectors are installed on each floor level of all completed homes.
- A copy of the signed landlord agreement will be provided to renters.
- Twenty-five percent of weatherized homes are inspected for quality and safety (“post inspection”) annually.
- Program is evaluated by comparing weather normalized pre-treatment usage to weather normalized post-treatment usage to determine savings.
- Contractors will be provided a list of customers that used more gas in the post period (weather normalized) to research and analyze what may have been the cause of the increased usage to help improve processes going forward.

### **Training & Contractor Qualifications**

The Company contracts with current DCED county weatherization providers and some for-profit companies. The Company accepts all DCED county weatherization provider training and requires Building Performance Institute qualifications for the other companies. As needed, the Company will hold a training meeting with all contractors to review Company procedures and to train on specific problem areas the Company is experiencing with multiple contractors or a new technology opportunity.

### **LIURP Post Inspection**

Columbia’s QA Coordinator oversees the quality control program. Current guidelines require 25% of each contractor’s work to receive a post-completion inspection. The QA Coordinator gets a listing of all jobs completed for the prior month and sends all jobs to the external post-completion inspectors. Exceptions to this process include times when the QA Coordinator was at the home after the work was completed, there is a safety issue in the home, such as an aggressive dog, or only an HVAC measure was installed, such as a new furnace. The post-

completion inspectors are provided the number of post-completion inspections needed by contractor, and the inspectors send letters to all customers of the contractors, which still need post-completion inspections. The inspectors also make outbound calls to encourage customer cooperation with the inspections. The inspectors work diligently to obtain approval from customers for post-completion inspections and stop outreach when they achieve 25% post-completion inspections for each contractor's work.

## **Emergency Repair Program**

### **Scope**

ERP provides services for eligible property owners who are without heat due to a gas line leak, water tank issue or inoperable heating system. Qualified participants will receive repair or replacement of faulty heating equipment, hot water tanks and/or gas lines. The program is for emergencies only and not intended to assist new homeowners with existing, known faulty equipment.

### **Eligibility Criteria**

- Request for services must be initiated by the property owner
- Income at or below 150% of the FPIG
- Up to 10% of the program budget can be used to assist customers between 151% and 200% of FPIG; and
- Must be an emergency situation and not have received ERP services for the same equipment within the last three years unless asserting an issue with the prior installation or equipment.

### **Program Components**

Income eligible homeowners who contact Columbia's CCC are screened for program benefits by Columbia CSRs. Customers are also referred through Columbia's Operations and Construction Departments and Community Based Organizations. The referral is made to a third-party administrator for follow-up within two hours. In most cases, income documentation is verified by existing documentation provided by LIHEAP, CAP, or other program enrollment. Household ownership is confirmed via county property search websites. Once eligibility is verified, the administrator contacts one of the program's partnering heating, ventilation and air conditioning contractors or plumbing contractors. With customer cooperation, emergencies are resolved within 24 hours during the winter months and initiated no later than the next business day in non-winter months.

### **Health and Safety Pilot**

The Health and Safety Pilot began in January 2021.

### **Key Objectives**

- To decrease the number of deferred jobs due to conditions in the home such as knob and tube wiring, moisture in basement due to leaky roofs, and other minor structural issues.

- To reduce usage in CAP customers' homes that could not be weatherized without remediating identified Health and Safety issues.

### **Eligibility**

- Must be an active CAP Customer with shortfall greater than \$1,000 per year average.
- Customer must own and reside in dwelling for a minimum of six months.
- Prior annual usage must be greater than 1600 therms or 250 average therms per winter months.
- A present Health and Safety issue that is preventing weatherization including, but not limited to, knob and tube wiring, presence of moisture, mold or mildew.
- The elimination of the Health and Safety issue will result in comprehensive measure installation and expected usage reductions greater than 18%.

### **Program Components**

- Additional Health and Safety spend will be authorized based on the following model, scenarios 2 through 5. PDV stands for Present Discounted Value (of Savings).

Variable		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
User Entered Fields	Pre-Treatment Therms	1500	1600	2500	3800	5000
	Home Age	50	30	100	100	100
	Square Feet	1500	1250	2000	3200	3200
	Air seal + Insulation Cost	\$800	\$1,400	\$1,000	\$2,700	\$5,000
	Heat Sys Replace (yes=1)	0	0	1	1	1
	Duct Sealing (yes=1)	0	1	0	1	1
	Contractor 74	0	0	0	1	0
	Contractor 102	0	1	0	0	0
	Contractor 77	0	0	0	0	1
	Contractor 103	0	0	0	0	0
	Heat Sys Cost	0	\$0	\$3,500	\$3,500	\$3,500
Other Non H&S Costs	\$800	\$800	\$1,000	\$1,000	\$2,000	
Calc Fields (5% discount)	Annual Savings (Therms)	214	301	578	1075	1536
	Calculated % Savings	14%	19%	23%	28%	31%
	PDV Savings (Therms)	1897	2672	5126	9527	13615
	Max Spending	\$1,986	\$2,798	\$5,368	\$9,977	\$14,258
	Total Non H&S Costs	\$1,600	\$2,200	\$5,500	\$7,200	\$10,500
	H&S Allowance	\$386	\$598	-\$132	\$2,777	\$3,758
Calc	12-Year Savings (Therms)	2568	3618	6940	12898	18434

Fields (no discount)	Max Spending	\$2,689	\$3,789	\$7,267	\$13,507	\$19,305
	H&S Allowance	\$1,089	\$1,589	\$1,767	\$6,307	\$8,805

- Pilot participants will be tracked separately for evaluation purposes.
- The Pilot’s success and cost-effectiveness will be measured similarly to LIURP.
- All other traditional components of LIURP will be maintained.

**Projected Enrollment**

- A maximum of \$400,000 in additional Health and Safety costs may be spent per year for this Pilot.
- Estimate of participants is 30 homes per year.

**HARDSHIP FUND**

**Scope**

Columbia contributes one dollar of shareholder money for every dollar contributed by its customers. Annually, Columbia raises \$75,000 to \$80,000 in customer contributions through bill solicitation. In addition, Columbia sponsors fundraising activities to increase customer contributions up to \$150,000. Combined with a shareholder match, this total of \$300,000 is available to payment-troubled, low-income customers for assistance with their Columbia bill. Opening and closing dates for the availability of funds are determined annually.

Additionally, the Commission has approved Columbia’s request to direct pipeline refunds and penalty credits received by Columbia to the Dollar Energy Fund to supplement these efforts as detailed above in the Historic Overview section. As of February 2023, there is \$375,000 remaining in pipeline refunds and penalty credits.

Approximately ten percent of awarded grant dollars are earmarked for administration. This money is paid to the administrator, Dollar Energy Fund, for the outreach and intake application process in the community. Currently, 92 community-based organizations take applications within communities that Columbia serves.

**Key Objectives**

- Prevent termination.
- Restore service.
- Reduce outstanding balances.

**Eligibility Criteria**

- Columbia residential heating customer.
- Household income at or below 200% of Federal Poverty Level.
- Must have exhausted all other available energy assistance resources.
- Minimum arrearage balance of \$100.00. for those under age 62.
- Demonstrated sincere payment effort of \$150.00. or \$100.00 for customers over 61 years of age
- Service Status Criteria
  - October, November and February, the program only assists customers without natural gas service or who are in threat of termination.
  - December, the program is only open to those without service.
  - In the remaining months, the program is open to all non-CAP customers while funds are available.
- Exceptions to eligibility criteria may be granted under special circumstances, which may include not requiring a sincere effort of payment, minimum arrearage balance, or CAP status.

### **Treatment of CAP Customers**

Columbia only allows Hardship Funds to be applied to CAP accounts when a customer is without service for non-payment during the months of October, November or December (cold weather procedure) or if the customer has been out of the program for more than one year. At that time, Columbia will allow the Hardship Fund grant to substitute for a customer payment for the purpose of re-instatement into CAP. CAP customers receive arrearage forgiveness and CAP credits that are, on average, higher than the maximum hardship fund grant. In an effort to ensure there is some assistance available for all customers that need help, Hardship Fund grants are limited for CAP customers. If funding is available in mid-May, the Company will open the program to active CAP customers.

### **Program Components**

- Screening and referrals at Columbia's Customer Care Center.
- Customers can apply in person at local screening agencies, over the telephone, or online. If a customer self declares difficulty with any of these options, a referral is made to the Company's O & E Coordinator. The Coordinator can take applications over the telephone and can provide tailored assistance to ensure a complete application. Spanish speaking customers can apply in person at an agency, over the phone or with assistance from the coordinator.
- Grant determination by Columbia employees for customers without service to expedite reconnections.
- Grant amounts do not exceed \$500 per customer. A grant of \$500, regardless of the balance owed, will be accepted as sufficient to end a termination or to restore service.

### **Fundraising**

- Columbia participates in Dollar Energy Fund-organized fundraisers with partial proceeds going to match Columbia’s shareholder match. These efforts include:
  - WarmAThon – radio call-in fundraiser - Columbia assists in staffing phone lines and sponsors event;
  - Cool Down for Warmth; – Volunteers stay in a house made of ice and ask for donations to the Dollar Energy Fund in order to get out of the house.
  - Golf Outing – Columbia sponsors event and golf teams; and
  - Request-a-Thon – Radio call-in fundraiser.
- Columbia sponsors Company-specific events to raise funds for the Hardship Fund annually:
  - Email blasts to customers;
  - Social media promotions throughout the year on Facebook and Twitter.
  - Bill insert requesting donations;
  - Thank you letters to previous donors; and
  - Sponsorship of TransSiberian Orchestra concert where \$.50 of every ticket sold goes to the Dollar Energy Fund.

## **CAP (CUSTOMER ASSISTANCE PROGRAM)**

### **Scope**

Columbia’s CAP was first established as a pilot program in 1992, at which time participation was limited to 1,000 customers. Since then, Columbia’s CAP has expanded to its current active total of approximately 24,300 participants.

The program was created as an alternative to traditional credit and collection measures to assist long-term, payment-troubled customers by offering affordable payment options.

Under provisions of the 1999 Natural Gas Choice and Competition Act, Columbia filed a restructuring settlement agreement at Docket No. R-00994781, under which it expanded the CAP program from 1,000 to 22,000 customers. Through a subsequent settlement agreement approved by the Commission at Docket No. P-00032057, the enrollment limit of CAP was modified to 27,135. To date, Columbia’s CAP has not reached the enrollment ceiling. In 2015, the Company was directed to remove the enrollment ceiling.

### **Key Objectives**

- Provide affordable payment options;
- Reduce credit/collection costs;
- Reduce arrearage write-off;
- Administer an efficient, cost-effective program;
- Enhance customer understanding of program benefits;
- Increased “on time” payment frequency;
- Minimize shortfall through energy efficiency programs;

- Target identification of low-income, payment-troubled customers; and
- Reduce Commission complaints.

## **Eligibility Criteria**

- Columbia residential heating customer;
- Household income at or below 150% of Federal Poverty Level. Household income is defined as all earned and unearned income from household members ~~over the age of 18~~ and over and excluding earned and unearned income for any members under the age of 18. Please see Attachment C for a list of acceptable documentation for various types of earned and unearned income. Please see Attachment D for a copy of the zero-income form used to verify customers that have no income. Must not reside in a multi-unit dwelling served by one meter; and
- Must provide proof of identity for all adults in the household by a Social Security number, driver’s license number or another state identification number. In addition, the Company will accept passports, temporary Social Security cards and alien ID numbers provided by a state refugee and immigration agency.

## **Program Components**

### **Administration**

- A Community Based Organization (“CBO”) performs clerical and administrative duties for portions of the CAP program. These functions include screening, enrollment, and re-verification.
- The Administrating Organization (the “Administrator”) networks with over 25 designated screening agencies/CBOs to complete on-site applications only when necessary. The Administrator also operates a phone enrollment process, an online enrollment process and paper applications.

Columbia’s CAP payment structure provides for the most affordable payment plan. The following options are available to accommodate differences in family size and usage:

Option #1:	Percentage of Income.		
	0 – 50% of FPL	=	4%
	51 – 150% of FPL	=	6%
Option #2			
	0 – 50% of FPL		50% of budget billing
	51 – 150% of FPL		75% of budget billing
	(Adjusted annually, with no true up charge)		

A minimum payment amount of twenty-five dollars is required.

Any payments made in excess of the monthly CAP bill are applied to future CAP bills.

The Administrator reviews the application verifies the applicant's eligibility, confirms the payment amount, and enters information into Columbia data systems. Columbia mails a confirmation letter to the customer.

With customer approval, the Administrator, the Dollar Energy Fund will use income received for a First Energy CAP application to verify eligibility for Columbia's CAP.

Columbia's CAP plans are designed to be the most affordable (lowest) payment plan offered by Columbia. If at any time a customer's CAP payment exceeds the tariff budget, the account is reviewed by an Energy Assistance Specialist to determine if the customer's payment should be lowered or if the customer should be removed from the CAP program.

The company will review all CAP accounts quarterly and will automatically enter the customer on the lowest option available. This is designed to ensure that customers who move from one address to another will continue to be provided the lowest CAP plan option at the new address.

## **Intake and Enrollment**

External studies support the use of telephonic applications with the intention of increasing customer ease, efficiency, and the number of applications completed while also decreasing administrative costs. While telephonic applications are encouraged, customers also have the option of applying for CAP during an on-site intake appointment at a community-based agency or by completing and submitting a CAP application through the mail or on-line.

Columbia's Customer Service Representatives coordinate referrals to the agencies and the Administrator for the intake and processing of CAP applications. All customers, regardless of intake type, are required to provide supporting documentation.

---

On-site applications are generally recommended, but not required, for reconnection of service, when a Hardship Fund application is also needed, or when a customer is considered vulnerable and needs assistance completing the application and providing documentation. A customer always has the option of an on-site intake appointment or to complete an application on-line or on paper.

A non-CAP customer or applicant without service who has a balance from a prior account is required to pay no more than \$150, apply for all available energy assistance programs and complete a CAP application to restore service and enroll in CAP.

A removed CAP customer who is without service may be required to pay no more than

\$300, apply for all available energy assistance programs, and complete a CAP application to re-enroll in CAP.

Any customer who is found to be, or found to have been, stealing gas will be charged separately from their CAP payment and required to pay full amount of theft prior to reconnection and re-enrollment.

The Company will charge no more than a prorated CAP bill for usage incurred during their final billing period.

### **Customer Responsibilities**

A CAP customer must agree to and uphold the following obligations:

- The initial application and subsequent re-application are subject to agreed-upon conditions, which serve as a contract between the customer and Columbia. See Attachment B.
- Income verification as required. Documentation can be for a minimum of thirty days to a maximum of one year, whichever provides the largest benefit to the customer. Documentation can be provided by mail, fax, e-mail, text or uploading documents via the administrator's secure website.
  - CAP households reporting no income will be required to recertify every six (6) months regardless of LIHEAP participation;
  - CAP households with income that participate in LIHEAP annually will be required to recertify once every three (3) years;
  - CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions will be required to recertify every three (3) years; and
  - All other CAP households will be required to recertify every two (2) years.
- The monthly payment amount must be paid by the due date.
- Since the current average CAP bill is \$58 and CAP is designed to ask for an affordable monthly payment regardless of the total bill amount, CAP customers are not eligible for Hardship Fund grants unless one of the following conditions exist:
  - The customer's service is off in October, November or December.
  - The customer has been out of CAP for one year.
  - The Company has funding available and opens to all CAP customers.
- The customer must accept any available free weatherization services offered through the Columbia's LIURP.
- Any customer with non-essential gas appliances such as a pool heater must agree not to use the device.

### **Usage Controls**

- CAP customers will be prioritized for LIURP if monthly usage averages over 170 Therms

during the winter months.

- CAP customers will be reviewed at the start of each year to identify all customers with more than \$1,500 shortfall in the prior year
  - Customers will be screened for Weatherization and if eligible, the Company will initiate the process with a letter advising the customer to contact the identified contractor to schedule an audit. The contractor identified in the Company's letter to the customer will also receive a letter from the Company that includes the customer's information and a request to schedule an audit directly with the customer.
  - All customers who are not eligible for weatherization will be provided information by mail or email on energy efficiency tips and resources
  - A survey will be sent to this subset of customers requesting information to determine whether the customer qualifies for an exemption due to usage beyond their control.

### **Transfer of Service**

A CAP customer who requests a transfer of service from one premises to another will have the CAP plan transferred with no interruption. The payment plan will be reviewed to ensure the customer is on the lowest payment option available.

For customers who opted to disconnect their service and then subsequently request service at a new address:

- If less than six months, the customer will need to request to be re-instated into CAP after connection of service. The customer is not required to re-verify income since it was less than six months.
- If more than six months, customer will need to complete a new CAP application and verify income.

### **Default Provisions**

A CAP participant can default from the program for non-compliance of program guidelines and customer responsibilities.

### **Default Provisions for Nonpayment of CAP Budgets**

*April 1 through October 31:* a CAP customer is in default after two missed CAP budget payments.

Columbia will issue a termination notice no sooner than 10 days after a customer fails to pay two CAP budget payments by the due date.

If a CAP customer does not make up all missed CAP payments within 10 days of the date of the termination notice, Columbia will attempt to terminate service for non-payment of

the CAP budget bill. Columbia, in its sole discretion, may delay termination in the event of extenuating circumstances.

To restore service, a CAP customer must pay all missed CAP budget payments that were the subject of termination as well as any missed CAP budget payments that became past due during the termination notice period.

To restore service, a customer that was removed from CAP more than four years from request of service, will be able to enroll in CAP as if he/she was never in CAP before. Any current arrears will be treated as a new pre- program balance.

*November 1 through March 31:* a CAP customer will not be removed from CAP for failing to make missed CAP payments. *Commencing February 1,* Columbia will issue termination notices to CAP customers who failed to pay CAP budget payments during the November to March period. The amount on the termination notice shall be for all missed CAP payments.

### **Default Provisions for Customers Requesting Removal from CAP**

A customer who requests removal from CAP will be sent a letter explaining the benefits of CAP, along with a return envelope. The customer will be required to sign and return the letter and upon Columbia's receipt of the executed letter, the customer will be removed from CAP.

The letter will confirm that the customer may not enroll in CAP for one year from the time of the customer's removal. The Company reserves the right to enroll a customer in CAP prior to one year after removal if extenuating circumstances exist. Most extenuating circumstances can be described as a hardship experienced by the customer after he/she left CAP such as a loss of income, deterioration of health of a household member or the death of a household member. A former CAP customer with no arrears that requests re-enrollment will be allowed back into CAP, subject to CAP eligibility and enrollment requirements.

### **Default Provisions for Customers with High Consumption**

A customer refusing weatherization through Columbia without demonstration of a legitimate exemption will be reviewed by Customer/Community Outreach coordinator.

A customer may be removed from CAP as a result of the review.

A customer who does not respond to multiple attempts for weatherization will be removed from the CAP program.

### **Re-connect Procedures**

Reconnection and subsequent re-instatement when the applicant's gas service had been terminated after removal from CAP less than four years prior:

- All missed CAP payments must be made, for each of the months during which gas service was retained.
- All payments made by the customer after removal from CAP will be deducted from the amount needed for program re-entry.
- Any charges incurred after the customer defaulted, which have not been paid by the customer, are treated as current bill shortfall amounts.
- An applicant will be required to re-apply, including providing proof of income, if the applicant has been without service for 6 months or more.
- These reconnect procedures also apply to defaulted CAP customers who move to a new address after termination for non-payment.

### **Security Deposits**

- CAP customers are not charged security deposits.
- The Company will continue its practice of reviewing any accounts newly self-identifying as level 1 and refund any security deposits at that time in compliance with Chapter 14 guidelines.
- Any paid security deposits on accounts with an approved CAP application will be refunded to the customer prior to entry into CAP.
- Past due security deposits from customers entering into CAP will be waived after income verification is complete.

### **Reconnection fees & Late fees**

- All reconnection fees will be waived for customers who are successfully enrolled in CAP.
- No late fees will be charged to active CAP customers.

### **Re-instatement**

Re-instatement when the customer retained gas service after removal from CAP less than four years prior:

- The customer must pay the entire balance of missed CAP payments.
- Any payments made by the customer after removal are deducted from the amount needed for program re-entry. A customer must resolve any outstanding issues related to removal from CAP, such as verifying current income or accepting free weatherization services.
- The pre-program arrearage will be the same at the time of re-instatement as at the time of default.

- Any charges incurred after default, which are not paid by the customer, are treated as current bill shortfall.
- This process also applies to CAP customers who move to a new service address with no interruption of service due to termination.

### **CAP Balance Clarification for re-entry into CAP less than four years from removal date**

When a customer leaves CAP, for any reason, but remains a customer, Columbia will maintain the customer's "CAP balance" separately, including CAP arrears, if any. As the customer receives a monthly non-CAP bill, his/her CAP balance will increase by the monthly asked-to-pay amount. As a customer makes a non-CAP payment or receives an energy assistance grant, the customer's CAP balance reduces by that payment or LIHEAP credit. In the future, should the customer reapply for CAP, he/she would first need to pay the full CAP balance-including amounts accrued while out of the program. The Company will accept any grant amounts in lieu of customer payments for re-enrollment.

Once the CAP balance is paid in full and the customer is re-enrolled in CAP, Columbia will retroactively apply 1/36<sup>th</sup> pre-program arrearage forgiveness for each month the customer spent out of the program. Columbia will also remove any new non-CAP arrears created since CAP removal and treat it as shortfall.

This process balances the customer's account as though the customer had remained in CAP throughout. In addition, the process encourages year-round participation and avoids seasonal fluctuations in CAP participation.

### **CAP Re-instatement for Customers out of CAP for four years or more**

Customers applying for the CAP with a removal date greater than that of four years or more will be treated as if they were never enrolled in CAP. They will follow all intake and enrollment procedures and receive the same benefits as first time enrollees.

### **Re-verification**

Re-verification of income is necessary to ensure that only low-income customers are offered a subsidized payment plan under CAP. CAP customers are required to provide proof of income every two years, with the following exceptions:

- 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.
- CAP households reporting no income are required to re-certify every six

months at a minimum (regardless of LIHEAP participation).

Columbia issues notification letters requiring income re-verification per the above schedule to customers 30 days prior to each customer's CAP re-verification due date. CAP participants are then required to provide verification of their household income to the Administrating Organization for processing. In turn, the customer will receive a letter verifying the customer's continued participation in CAP and detailing any changes made to their required CAP payment. For customers preferring to re-verify in person, appointments can be made available with a screening agency.

Columbia will remove from CAP any customer who fails to re-verify income within 30 days after the re-verification due date and 60 days after the issuance of the notification letter that verified income is required.

Customers who claim zero income will be required to verify their income after six months of participation. A customer will continue to be required to verify their income every six months for as long as they verify at zero income. Income verification will include completing a standard form documenting zero income. See Attachment D.

Once removed for failure to re-verify income, a customer will be re-entered into CAP immediately after eligible proof of income is received.

### **Arrearage Retirement**

One-thirty-sixth (1/36) of the pre-program balance is forgiven for every full CAP payment received regardless of arrears and retroactively for any months missed once those months are paid. For example, if a CAP customer is delinquent for three months of payments, and makes catch-up payments for two of those three months, the customer will receive arrearage forgiveness for those two months. A customer's total pre-program arrearage will be forgiven after thirty-six full CAP payments. The customer retirement is clearly noted on the account summary portion of the monthly CAP bill.

### **Universal Service Projected Needs Assessment**

Columbia developed the projected needs assessment on the premise that Universal Service Programs should be offered as a menu of options to suit the circumstances of individual customers. Columbia assesses the potential participant and recommends the programs that best suit his or her payment-troubled situation. One size does not fit all, nor does one program suit all customers.

Columbia has implemented this philosophy through administrative processes within its

customer services protocols to serve its low-income, payment-troubled customers at the first point of contact. This process was previously referred to as the One-Stop-Shop approach.

Columbia referenced two sources to complete this assessment. The first is the 2022 Federal Census Data, the most current census data available. The second is Columbia's customer information system.

The Bureau of Consumer Services developed a Needs Assessment Proposal dated May 9, 2001, to help define and illustrate what is expected in the needs assessment. The proposal outlined the following six criteria:

1) Identified Low-Income Customers

The Company reports an average of 70,084 customers that self-declared as low income or verified income through LIHEAP or CAP.

**2. Estimated Low-income Customers**

In addition to quantifying verified and self-declared low-income customers, Columbia also uses updated federal census data to estimate the number of low-income customers that it serves. The table below references the number of residential households that Columbia serves in each county and equates that to the percentage compared to the total number of households within each county. The census data indicates that there are 379,434 low-income households within the counties that Columbia serves. Using the same percentage, 91,849 households are estimated to be Columbia low-income households

County	Customer Count	Census Household	Percent Customers CPA	Census Household Low-Income at <150%	Low-Income CPA
ADAMS	14,773	39,908	37.02%	7,155	2,649
ALLEGHENY	102,588	545,763	18.80%	122,040	22,940
ARMSTRONG	857	27,704	3.09%	6,853	212
BEAVER	35,900	71,717	50.06%	16,084	8,051
BEDFORD	12	19,334	0.06%	5,255	3
BUTLER	9,608	78,365	12.26%	14,475	1,775
CENTRE	13,758	57,834	23.79%	17,533	4,171
CLARION	3,533	14,632	24.15%	4,854	1,172
ELK	31	13,499	0.23%	3,174	7
FAYETTE	22,111	54,097	40.87%	16,690	6,822
FRANKLIN	4,782	61,854	7.73%	15,070	1,165
FULTON	4	5,990	0.07%	1,425	1
GREENE	2,690	13,957	19.27%	3,518	678
INDIANA	550	32,425	1.70%	10,162	172
JEFFERSON	352	17,745	1.98%	5,463	108
LAWRENCE	18,131	36,111	50.21%	10,506	5,275
MCKEAN	3,145	15,776	19.94%	5,136	1,024
MERCER	29	45,798	0.06%	12,433	8
SOMERSET	4,782	28,857	16.57%	7,446	1,234
VENANGO	684	16,070	4.26%	5,907	251
WARREN	2,355	17,124	13.75%	4,331	596
WASHINGTON	43,941	86,028	51.08%	17,016	8,691
WESTMORELAND	20,825	152,288	13.67%	32,291	4,416
YORK	104,113	176,428	59.01%	34,617	20,428
<b>TOTAL</b>	<b>409,554</b>	<b>1,629,304</b>		<b>379,434</b>	<b>91,849</b>

- 1) **Columbia Customer Count** – Number of households per county served by Columbia.
- 2) **Census Household** – Number of households per county identified by census data.
- 3) **Percent Customers Columbia** – Percent of total county households served by Columbia (#1 / #2).
- 4) **Census Household Low-Income** – Number of low-income households per county identified by census data.
- 5) **Low-Income Columbia** – Estimated number of low-income households per county served by Columbia (#3 X #4).

### 3. The Number of Identified Payment-troubled, Low-income Customers

Based upon the definitions at 52 Pa. Code §§ 54.72, 62.2 and 69.262, "Payment Troubled" is defined as a household that has failed to maintain one or more payment arrangements in a one-year period. Columbia used data gained from its actual experiences to identify the number of payment-troubled customers. Columbia reviewed confirmed low-income accounts that are in arrears on payment agreements and not on payment agreements and took the average monthly of both to arrive at the identified, payment-troubled low-income total of 9,320.

### 4. Estimate of Potentially Payment-troubled, Low-income Customers

Next, Columbia compared the data obtained from its customer information system to census data. The number of customers identified as low-income based on Columbia's customer information system is 70,084. The number of customers estimated by census data to be low income is 91,849. The census figures suggest that Columbia's service territory has 21,765 more low-income customers than Columbia's data indicate. However, Columbia does not serve all customers in every county. Therefore, Columbia's estimate is not exact. In fact, Columbia recently purchased data from a third-party credit company that estimated Columbia's low-income population to be 57,686 at the zip code level.

### 5 Number of Customers Who Still Need LIURP Services and the Cost to Serve that Number

Pursuant to BCS's May 9, 2001, Needs Assessment Proposal, Columbia identified the number of customers that meet the LIURP eligibility criteria, excluding those customers who have already received weatherization services. According to data from Columbia's customer information system, 24,933 customers meet the LIURP eligibility criteria. Of that total, 13,531 are property owners while the remaining 11,402 are renters. Columbia historically has had difficulty obtaining landlord approvals to weatherize homes. Assuming a 50% success rate, Columbia anticipates that half of the 11,402 renters in addition to the 13,531 property owners, totaling 24,933 could receive weatherization services. The estimated cost to provide weatherization services to these customers is \$286,455,237 at Columbia's current average expenditure per weatherized household.

### 6 Enrollment Size of CAP to Serve All Eligible Customers

Columbia projects its CAP to range from 25,000 to 31,000 during this USECP. However, Columbia does not have a CAP enrollment ceiling and strives to ensure that every potentially eligible customer is aware of the program and has the necessary information and tools to apply if desired.

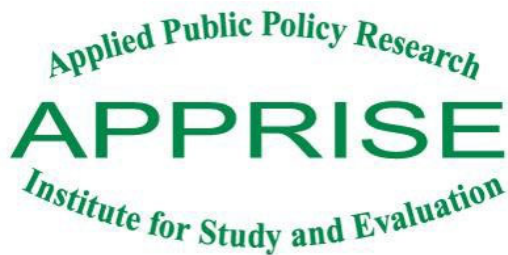
## Projected Enrollment \*

	2024	2025	2026	2027	2028
<b>LIURP</b>	455	455	425	425	425
<b>ERP</b>	296	290	290	290	290
<b>CARES</b>	400	400	400	400	400
<b>CAP</b>	25,725	27,011	28,362	29,780	31,000
<b>Hardship Funds</b>	1,300	800	800	800	800

\* The projected enrollments stated in this table are estimates and should not be considered ceilings. Although Columbia is estimating enrollment levels, Columbia will continue to promote programs and enroll customers needing assistance beyond these participation levels as needed.

## Conclusion

Columbia's Universal Service Program is designed to address the multifaceted needs of Columbia's diverse customer base. The present array of Universal Service Programs is an appropriate mix of services that meets the requirements of 66 Pa. C.S. § 2203(8) and 52 Pa. Code Chapter 62. Columbia respectfully requests that the Commission approve the changes identified herein. In addition, Columbia respectfully requests that the Commission approve its 2024-2028 Universal Service and Energy Conservation Plan in its entirety.



# MEMO

---

**DATE:** September 7, 2017

**TO:** Deb Davis

**FROM:** Jackie Berger

**SUBJECT:** Columbia Gas LIURP Health and Safety Research

---

This memo provides a summary of research conducted on health and safety barriers and potential approaches in Columbia Gas of Pennsylvania's Low-Income Usage Reduction Program (LIURP).

## I. Introduction

Many low-income usage reduction programs are facing increasing challenges serving customers due to the prevalence of health and safety problems that prevent major measures from being installed. As a result of serious issues in the home, customers must be deferred or are treated with only minor services, and high-usage customer with good potential for savings do not participate or only achieve low energy savings. This research provides an assessment of the circumstances under which additional cost-effective health and safety spending can be made to achieve greater savings for low-income customers and the program as a whole.

## II. Research Tasks

This section provides a description of the research tasks and associated findings.

### A. Assessing the Problem – Deferred Jobs and Jobs without Major Measures

The first step in the research was to assess the extent of the issue. We analyzed Columbia Gas' 2015 program database, reviewed the cancelled jobs spreadsheet, and reviewed job paperwork. We considered jobs in the following categories as the initial list of indicators that a health and safety issue prevented weatherization work.

- No measure invoice data.
- Job marked as incomplete.
- No blower door test data.
- Blower door indicator marked as not done.

Table II-1 shows that a significant percent of jobs had these issues. Overall, 46 percent of the 997 jobs in the 2015 database had one or more of the issues.

**Table II-1**  
**Assessment of 2015 Jobs with Potential Health and Safety Issues**

Indicator of Potential Issue	Number	Percent
No Invoice Data	225	23%

Incomplete Job	391	39%
No Blower Door Test	398	40%
Blower Door Indicator=0	382	38%
Any of Four Issues Listed	462	46%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

We next identified jobs that may be limited due to health and safety issues as those where total job costs were less than \$750 or total job costs minus heating system replacement costs were less than \$750. Table II-2 shows that 35 percent of jobs had at least one of these issues.

**Table II-2**  
**Assessment of 2015 Jobs that May Have Been Limited**  
**Due to Health and Safety Issues**

<b>Cost Issue</b>	<b>Number</b>	<b>Percent</b>
Total Job Costs <\$750	330	33%
Non-Heating Replacement Job Costs<\$750	346	35%
Either Cost Issue	346	35%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

Table II-3 shows that when considering all of the issues described above, 47 percent of the 997 jobs were flagged as having a potential health and safety issue.

**Table II-3**  
**Assessment of 2015 Jobs with Potential Health and Safety Issues**  
**Based on All Analysis Factors**

<b>Indicator of Potential Issue</b>	<b>Number</b>	<b>Percent</b>
No Invoice Data	225	23%
Incomplete Job	391	39%
No Blower Door Test	398	40%
Blower Door Indicator =0	382	38%
Either Cost Issue	346	35%
Any of Five Issues Listed	467	47%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>

We next merged these jobs with Columbia Gas’ cancelled/deferred jobs spreadsheet. Of the 467 jobs identified as having potential health and safety issues, 329 were in Columbia Gas’ cancelled/deferred jobs spreadsheet. When we assessed the reason for the cancelled job, we found that 91 of these jobs were cancelled or deferred due to health and safety issues, and the others were cancelled for other reasons including customer refusal and ineligibility.

We requested a total of 229 job files from Columbia Gas, the 91 cancelled/deferred jobs with health and safety issues and the additional 138 jobs that were identified as having potential health and safety issues, but were not in Columbia Gas’ cancelled/deferred spreadsheet.

Table II-4 shows the number and percent of jobs that were initially flagged as potentially having a health and safety issue (and one additional job that was not initially flagged but was included in Columbia Gas’ cancelled jobs spreadsheet.) The total number of jobs was 468. The table also shows the number and percent that were identified as having a health and safety issue that prevented energy efficiency work based upon detailed review of the customer’s file. The job file usually included the audit form, work scope, and measure invoice(s). All of the materials in the file were reviewed to assess whether there was a health and safety issue that prevented work from being completed.

The table shows that overall 26 percent of the flagged jobs and 120 jobs in total had a health and safety issue that prevented weatherization.

**Table II-4  
2015 Jobs with Health and Safety Issues**

Indicator of Potential Issue	All Jobs		H&S Issue	
	Number	Percent	Number	Percent
No Invoice Data	225	23%	6	3%
Incomplete Job	391	39%	70	18%
No Blower Door Test	399	40%	93	23%
Blower Door Indicator =0	382	38%	81	21%
Either Cost Issue	346	35%	48	14%
Cancelled Jobs	329	33%	30	9%
Any of Six Issues Listed	468	47%	120	26%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>	--	--

The file review described above was also the source of information for the specific health and safety issue(s). Table II-5 displays the prevalence of major health and safety issues. Note that jobs could have more than one issue identified, so percentages do not sum to 100 percent. The most common issue was mold and/or moisture which prevented eight percent of jobs from being completed and comprised 68 percent of the health and safety issues. The other most common issues were knob and tube wiring and roof leaks.

**Table II-5  
2015 Frequency of Specific Health and Safety Issues**

H&S Issue	Jobs with Health & Safety Issues that Prevented Work		
	Number	Percent of All Jobs	Percent of H&S Issues
Mold or Moisture	83	8%	68%
Knob and Tube Wiring	41	4%	34%
Roof Leak	38	4%	31%
Asbestos/Vermiculite	18	2%	15%
Sewage Leak	13	1%	11%
Infestation	12	1%	10%
Structural Issues	12	1%	10%
Holes in Attic Floor	10	1%	8%
Clutter	8	1%	7%
Other	21	2%	17%
Any Issue	122	12%	100%
<b>All Jobs</b>	<b>997</b>	<b>100%</b>	<b>100%</b>

**B. Current Health and Safety Approach**

Columbia Gas allows contractors to spend up to \$650 on health and safety repairs regardless of whether the customer owns or rents the home. For renters, this funding is usually related to HVAC repairs that will allow for weatherization work to be completed. If the customer owns the home, the \$650 may be used for a roof patch repair, or for a small amount of mold remediation.

Columbia Gas will approve additional spending on a case-by-case basis when contractors call to request additional funding. One of the most consistent areas where contractors ask for additional funding is for knob & tube abatement which may cost from \$1,000 to \$3,000. If Columbia Gas believes that the customer will get higher savings because there is no insulation in the attic, Columbia Gas would approve such a request. This would result in higher health and safety spending and higher total job spending above the initial calculated total spending target.

Contractors have various risk thresholds. Some will do any repairs that Columbia Gas permits so that they can proceed with the job, and some will not address the home if there is any water in the basement, for example. Columbia Gas leaves it up to the contractor to decide what issues to address because the contractor has the responsibility for the liability. Columbia Gas could potentially re-assign a job to another contractor who is willing to do the health and safety remediation work if the originally assigned contractor would not do so.

Table II-6 displays the percent of completed jobs included in the 2013-2015 evaluations with various health and safety repairs and the cost distribution for those repairs. Overall, 74 percent of the jobs had at least one of these repairs and the average cost of all repairs in the home was \$453. Ten percent of jobs had total repair costs of more than \$1,025. The most common issue was dryer venting, which was included in half of the 2013-2015 jobs. Miscellaneous repairs in the LIURP codebook include chimney, windows, and electrical repairs. Interior repairs include floor, wall, ceiling, floor under bath, wall plaster, ceiling plaster, and other pre-air sealing repairs.

**Table II-6  
2013-2015 Health and Safety Repairs and Spending Distribution**

	Repair Issue		Repair Cost (For Those with Repair)							
	Number	Percent	Mean	Percentile						
				Min	10	25	50	75	90	Max
Dryer Venting	693	50%	\$91	\$10	\$57	\$75	\$90	\$91	\$119	\$635
Miscellaneous	528	38%	\$392	\$0	\$31	\$48	\$102	\$239	\$1,388	\$6,464
Interior	485	35%	\$304	\$8	\$75	\$112	\$153	\$345	\$684	\$2,654
Kitchen or Bath Exhaust	158	11%	\$236	\$28	\$82	\$125	\$202	\$350	\$420	\$1,016
Roof	68	5%	\$167	\$20	\$70	\$85	\$85	\$170	\$370	\$850
<b>Total – Any Repair</b>	<b>1,028</b>	<b>74%</b>	<b>\$453</b>	<b>\$0</b>	<b>\$80</b>	<b>\$105</b>	<b>\$230</b>	<b>\$440</b>	<b>\$1,025</b>	<b>\$6,625</b>

Note: One customer with a Misc. repair had no costs.

### C. LIURP Savings Results

We analyzed Columbia Gas' 2013, 2014, and 2015 LIURP evaluation data to understand the level of savings achieved based on weather normalized pre-treatment usage, contractor, measures, job costs, and other characteristics.

Table II-7 displays the mean energy savings for 2015 jobs alone and the jobs completed in 2013 through 2015. We focus on the three-year analysis in this study to provide more jobs for analysis and a better prediction of energy savings based on job characteristics. While mean savings in 2015 were 258 ccf or 17.8 percent of pre-treatment usage, mean savings over the 3-year period were 304 ccf or 20.1 percent of pre-treatment usage.

**Table II-7  
Weather-Normalized Gas Heating Savings Analysis**

Analysis Group	Obs.	Usage (ccf)		Savings	
		Pre	Post	ccf	%
2015	533	1,449	1,191	258**	17.8%
2013-2015	1,398	1,515	1,211	304**	20.1%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-8 displays the mean energy savings for 2013-2015 jobs by pre-treatment usage. We use the 3-year period to provide a greater number of jobs in each usage bin. The table provides the following information.

- **Job Cost:** The mean job cost does not increase linearly with the pre-treatment usage, indicating that the number and depth of measures does not increase at the same rate as pre-treatment usage. There is likely to be variance caused by differences in contractors' practices and costs, and by home conditions that impact energy-saving opportunities.
- **CCF savings:** The amount of natural gas saved does increase linearly with pre-treatment weather-normalized usage. While jobs with pre-treatment usage of less than 1,000 ccf save an average of 159 ccf, jobs with pre-treatment usage of 1,201 to 1,300 ccf save an average of 245 ccf, jobs with 1,701 to 1,800 ccf save an average of 345 ccf, and jobs with pre-treatment usage over 2,200 save an average of 629 ccf.
- **Percent savings:** The percent of pre-treatment usage saved generally increases with pre-treatment usage, but not as consistently as the amount saved.

**Table II-8  
2013-2015 Savings by Pre-Treatment Usage**

Weather-Normalized Pre-Treatment Usage (ccf)	2013-2015 Participants					
	Obs.	Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<1,000	104	\$5,514	927	767	159**	17.2%
1,001-1,100	122	\$4,935	1,049	877	172**	16.4%
1,101-1,200	118	\$5,672	1,151	929	222**	19.3%
1,201-1,300	136	\$5,307	1,249	1,004	245**	19.6%
1,301-1,400	159	\$5,288	1,349	1,097	252**	18.7%
1,401-1,500	125	\$5,574	1,448	1,147	301**	20.8%
1,501-1,600	151	\$5,135	1,547	1,234	313**	20.2%
1,601-1,700	112	\$5,217	1,648	1,340	308**	18.7%
1,701-1,800	89	\$5,130	1,746	1,402	345**	19.8%
1,801-1,900	67	\$5,648	1,847	1,436	410**	22.2%
1,901-2,000	54	\$6,169	1,947	1,535	412**	21.2%
2,001-2,200	60	\$6,408	2,082	1,663	419**	20.1%
2,201+	101	\$7,601	2,627	1,999	629**	23.9%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-9 displays 2013-2015 savings by contractor for all contractors who had at least 50 jobs included in the 2013-2015 evaluations. Average savings vary significantly by contractor. Contractors with the lowest savings had mean savings of about 200 ccf or 15 percent of pre-treatment usage, and one

contractor with the highest savings who had 306 jobs included in the evaluations saved an average of 433 ccf or 27.5 percent of pre-treatment usage.

**Table II-9  
2013-2015 Savings by Contractor**

Contractor Code	2013-2015 Participants					
	Obs.	Mean Cost	Usage		Savings	
			Pre	Post	ccf	%
28	306	\$8,184	1,573	1,140	433**	27.5%
83	169	\$4,968	1,528	1,270	257**	16.8%
101	121	\$8,322	1,478	1,168	310**	21.0%
74	108	\$7,836	1,458	1,121	336**	23.1%
96	98	\$5,160	1,436	1,141	294**	20.5%
90	96	\$7,046	1,420	1,187	233**	16.4%
102	81	\$5,105	1,619	1,374	245**	15.1%
77	78	\$5,979	1,467	1,171	296**	20.2%
108	76	\$8,052	1,317	1,116	201**	15.3%
75	66	\$5,445	1,526	1,299	226**	14.8%
103	57	\$7,677	1,716	1,441	275**	16.0%
Others	142	\$7,852	1,558	1,306	253**	16.2%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-10 displays the savings by the total job cost. The table shows that jobs with higher costs have greater savings. While jobs with total costs under \$4,000 saved an average of 180 ccf, jobs with total costs of more than 10,000 saved an average of 458 ccf.

**Table II-10  
2013-2015 Savings by Total Cost**

Total Cost	2013-2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=\$4,000	264	\$2,806	1,492	1,312	180**	12.1%

Total Cost	2013-2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
\$4,001-\$6,000	336	\$5,112	1,505	1,272	233**	15.5%
\$6,001-\$8,000	320	\$6,970	1,511	1,192	318**	21.1%
\$8,000-\$10,000	230	\$8,898	1,504	1,137	367**	24.4%
>\$10,000	248	\$12,288	1,571	1,113	458**	29.2%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-11 displays the savings by the job cost excluding the cost of heating system replacements. Savings also increase with these costs.

**Table II-11**  
**2013-2015 Savings by Total Cost**  
**Excluding Heating System Replacement**

Total Cost	Treatment Group					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=\$4,000	451	\$2,434	1,505	1,271	234**	15.5%
\$4,001-\$6,000	374	\$5,101	1,497	1,218	278**	18.6%
\$6,001-\$8,000	353	\$6,966	1,488	1,131	357**	24.0%
>\$8,000	220	\$11,341	1,612	1,202	410**	25.4%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-12 displays savings by whether or not certain measures were installed. The table shows that for all measures except heating system repair, jobs with the measure saved more than those without. For example, while jobs with blower door guided air sealing saved an average of 323 ccf, jobs without that measure saved an average of 290 ccf. While jobs with a heating system replacement saved an average of 392 ccf, jobs without a heating system replacement saved an average of 239 ccf.

**Table II-12**  
**2013-2015 Savings by Measures Installed**

Total Cost	2013-2015 Participants			
	Obs.	Mean	Usage	Savings

		Total Cost	Pre	Post	ccf	%
Blower Door Test						
Yes	1,282	\$7,188	1,513	1,204	310**	20.5%
No	116	\$4,902	1,537	1,291	247**	16.0%
Blower Door Guided Air Sealing						
Yes	618	\$7,110	1,517	1,195	323**	21.3%
No	780	\$6,909	1,514	1,224	290**	19.2%
Insulation						
Yes	1,116	\$7,581	1,509	1,185	323**	21.4%
No	282	\$4,692	1,542	1,312	231**	15.0%
Blower Door Guided Air Sealing & Insulation						
Yes	563	\$7,403	1,513	1,173	339**	22.4%
No	835	\$6,724	1,517	1,236	281**	18.5%
Heating System Repair						
Yes	390	\$7,394	1,467	1,191	275**	18.8%
No	1,008	\$6,845	1,534	1,218	316**	20.6%
Heating System Replacement						
Yes	599	\$8,762	1,526	1,133	392**	25.7%
No	799	\$5,676	1,508	1,269	239**	15.8%
Duct Work						
Yes	546	\$7,097	1,458	1,115	343**	23.5%
No	852	\$6,935	1,552	1,272	280**	18.0%
Health & Safety Repairs						
Yes	1,028	\$7,433	1,508	1,190	317**	21.0%
No	370	\$5,789	1,537	1,267	270**	17.5%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

Table II-13 displays savings for 2015 jobs by the blower door measured leakage reduction (for jobs with pre- and post-treatment testing values). This table is only shown for 2015, because the additional database that contains this information was not analyzed for the other program years. The table shows that savings increase as the CFM50 reduction increases.

**Table II-13  
2015 Savings by Blower Door Leakage Reduction**

CFM50 Reduction	2015 Participants					
	Obs.	Mean Total Cost	Usage		Savings	
			Pre	Post	ccf	%
<=500	140	\$7,183	1,437	1,224	213**	14.8%
500-1,000	80	\$6,771	1,430	1,174	257**	17.9%
1,001-2,000	111	\$7,373	1,408	1,107	300**	21.3%
>2,000	96	\$8,880	1,585	1,242	343**	21.6%
All	427	\$7,537	1,461	1,188	273**	18.7%

\*\*Denotes significance at the 99 percent level. \*Denotes significance at the 95 percent level. #Denotes significance at the 90 percent level.

**D. Potential Savings for Homes with Health and Safety Problems**

We conducted regression analysis to assess the job-related factors that do the best at predicting energy savings. After running several models, the following model kept the variables that were statistically significant, as shown in Table II-14.

**Table II-14  
2013-2015 Regression Analysis**

Variable	2013-2015 Participants (1,372 observations)		
	Coefficient	95% Confidence Interval	
Pre-Treatment Usage (ccf)	0.30	0.27	0.32
Home Age	-1.06	-1.51	-0.61
Square Feet	-0.09	-0.11	-0.07
Blower Door and Air Sealing Cost	0.05	0.04	0.05
Heating System Replaced (yes/no)	154.56	131.84	177.28
Duct Sealing (yes/no)	55.80	32.41	79.19
Contractor #74	79.58	36.48	122.67
Contractor #77	73.69	23.52	123.86
Contractor # 102	-72.10	-119.97	-24.22
Contractor # 103	-106.37	-162.50	-50.24

Variable	2013-2015 Participants (1,372 observations)		
	Coefficient	95% Confidence Interval	
Constant	-73.01	-135.24	-10.79

Previous iterations of the regression included the following variables, but these were not found to be significant.

- Home Ownership
- Row Home (as opposed to single-family)
- Contractors not included above
- Blower-door reduction (2015 regression only)
- Health and Safety Repairs (yes/no)
- Health and Safety Repair Costs

#### E. Decision Framework for Additional Health and Safety Investments

Based on this research, we developed a decision framework for how much to spend on health and safety. Table II-15 displays some examples of model inputs and outputs. The table shows a range of pre-treatment usage, home age, home size, and measure investments. Based on the inputted fields, the model calculates the predicted annual savings and percent savings, the present discounted value of savings assuming a five percent discount rate, and the maximum spending on health and safety given the projected savings and the measure-level spending. The maximum spending is based upon the current price of \$1.04723 per therm of natural gas.

In addition to showing the discounted present value of savings, the table shows twelve years of savings without discounting, which leads to higher total savings and a greater amount allocated for health and safety spending. Under Scenario 5, a large old home with high pre-treatment usage, and a large investment in air sealing and other measures, the model shows that there can be up to \$8,805 spent on health and safety (with no discounting) and the job will still be cost-effective.

**Table II-15  
Model Scenarios**

Variable		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
User Entered Fields	Pre-Treatment Therms	1500	1600	2500	3800	5000
	Home Age	50	30	100	100	100
	Square Feet	1500	1250	2000	3200	3200
	Air seal + Insulation Cost	\$800	\$1,400	\$1,000	\$2,700	\$5,000
	Heat Sys Replace (yes=1)	0	0	1	1	1
	Duct Sealing (yes=1)	0	1	0	1	1
	Contractor 74	0	0	0	1	0
	Contractor 102	0	1	0	0	0
	Contractor 77	0	0	0	0	1
	Contractor 103	0	0	0	0	0
	Heat Sys Cost	0	\$0	\$3,500	\$3,500	\$3,500
	Other Non H&S Costs	\$800	\$800	\$1,000	\$1,000	\$2,000

Calc Fields (5% discount)	Annual Savings (Therms)	214	301	578	1075	1536
	Calculated % Savings	14%	19%	23%	28%	31%
	PDV Savings (Therms)	1897	2672	5126	9527	13615
	Max Spending	\$1,986	\$2,798	\$5,368	\$9,977	\$14,258
	Total Non H&S Costs	\$1,600	\$2,200	\$5,500	\$7,200	\$10,500
	H&S Allowance	\$386	\$598	-\$132	\$2,777	\$3,758
Calc Fields (no discount)	12-Year Savings (Therms)	2568	3618	6940	12898	18434
	Max Spending	\$2,689	\$3,789	\$7,267	\$13,507	\$19,305
	H&S Allowance	\$1,089	\$1,589	\$1,767	\$6,307	\$8,805

The model provided above is an alternative to Columbia Gas' current method of projecting job savings and an initial spending allocation. Columbia Gas' current method applies a specific savings factor to pre-treatment usage for each contractor based on their historical savings. When we run a regression that only controls for pre-treatment usage and contractor, we find that 25 percent of the variation in savings is accounted for by those factors. However, when we run the model shown in Table II-14 and used in the analysis above, we find that 43 percent of the variation of savings is explained by the model. Therefore, this model that takes account of additional factors does a better job of predicting savings. This model only includes the contractors who have statistically significant differences in savings after controlling for the other factors. Some contractors may have higher or lower savings than average, but those differences are better explained by differences in factors included in the model, and given those factors, those contractors do not have savings that are statistically different than the other contractors.

Under Columbia Gas' current method of determining the initial amount of spending, they allow for an adjustment if the contractor feels that he will be able to obtain greater savings than his usual percentage given the opportunities in the home. For example, if the contractor has historical savings of 20 percent, but feels that he can achieve 25 percent on the home, Columbia Gas may raise the spending ceiling. Under this revised approach, Columbia Gas could also provide that same flexibility if desired. However, they would use this alternative model estimate as the starting point for the spending cap, rather than the simple percentage savings based on the contractor's historical savings level.

Tables II-16A and II-16B provide information on measure costs over the three years of analysis, 2013 through 2015. There were 1,398 jobs included in this analysis. These tables provided information used in projecting costs for various measures that were included in the scenarios examined.

**Table II-16A  
Measure Costs**

Costs	Mean	Min	Percentile					Max
			P10	P25	P50	P75	P90	
Blower Door Air Sealing	\$147	\$0	\$0	\$0	\$0	\$150	\$424	\$3,395
Insulation	\$2,012	\$0	\$0	\$302	\$1,686	\$3,260	\$4,664	\$10,514
BD Air Seal+Insul	\$2,159	\$0	\$0	\$487	\$1,850	\$3,439	\$4,817	\$10,854
Duct Sealing	\$84	\$0	\$0	\$0	\$0	\$89	\$180	\$6,700
Heating System Repair	\$162	\$0	\$0	\$0	\$0	\$80	\$529	\$7,269
Heating System Replacement	\$1,557	\$0	\$0	\$0	\$0	\$2,950	\$4,550	\$10,375

Health and Safety Costs	\$333	\$0	\$0	\$0	\$140	\$324	\$774	\$6,625
Total Costs-Air Sealing-Insulation	\$4,839	\$0	\$1,801	\$2,770	\$4,293	\$6,376	\$8,384	\$20,302
Total-Air Sealing-Insulation-Duct Sealing	\$4,755	\$0	\$1,781	\$2,688	\$4,226	\$6,285	\$8,296	\$20,302
Total Costs-Health & Safety	\$6,664	\$0	\$2,875	\$4,387	\$6,333	\$8,583	\$10,685	\$23,390
Total Costs	\$6,998	\$0	\$3,056	\$4,656	\$6,592	\$8,930	\$11,258	\$23,597

**Table II-16B**

**Measure Costs**

Costs	% with Measure	# with Measure	Costs Statistics for those with Measure					
			Mean	P10	P25	P50	P75	P90
Blower Door Air Sealing	44%	618	\$334	\$75	\$150	\$170	\$377	\$725
Insulation	80%	1,116	\$2,520	\$483	\$1,151	\$2,292	\$3,655	\$4,883
Duct Sealing	39%	546	\$215	\$65	\$85	\$134	\$180	\$381
Heating System Repair	28%	390	\$580	\$80	\$175	\$361	\$696	\$1,361
Heating System Replacement	43%	599	\$3,635	\$2,483	\$2,760	\$3,162	\$4,458	\$5,560
Health & Safety	74%	1,028	\$453	\$80	\$105	\$230	\$440	\$1,025
Total Costs	99%	1,395	\$7,013	\$3,094	\$4,688	\$6,602	\$8,946	\$11,258

**III. Summary**

This memo provided the results from a study of Columbia Gas' LIURP program, health and safety barriers, health and safety expenditures, and a new approach for determining total and health and safety spending. We find that, depending on the job characteristics, Columbia Gas may be able to spend a significant amount of funds on health and safety and still achieve cost-effective savings, given the high level of opportunities for savings found in the home. This approach would yield high energy savings, reduced costs for ratepayers who are contributing to the costs of the Customer Assistance Program (CAP), and greater likelihood that the customer may be able to afford the full bill if the household exits CAP at some point in the future. We recommend that Columbia Gas pilot this approach on high-usage homes with significant health and safety barriers and assess the level of savings that are achieved.

Columbia Gas of Pennsylvania, Inc.

C A P

**CUSTOMER AGREEMENT FORM**

As a participant in the Columbia Gas of Pennsylvania’s Customer Assistance Program, I agree to accept all of the program conditions as listed below. Failure to agree or follow through on any of the accepted conditions will result in removal from the CAP Program.

**I agree to:**

- Verify gross monthly income at time of application.
- Re-verify gross monthly income every other year; unless you apply and receive an Energy Assistance Grant and it is posted to Columbia Gas.
- Notify the Universal Service Representative at **1-800-537-7431** of any changes in income, household size or residence.
- Pay the CAP payment, monthly, by the due date.
- Resume paying your full CAP installment when your LIHEAP grant is exhausted.
- Call Columbia Gas CAP immediately if you are no longer able to afford your CAP plan to avoid getting behind on your bill.
- Apply for any free weatherization service including the Columbia Gas Warm Wjse LIURP Program if I meet the eligibility requirements.
- Authorize Columbia Gas to share and use data including, but not limited to, income, and household member information furnished by me or on my behalf regarding me or members of my household concerning any application for, or participation in, the Program, with the Public Utilities Commission and entities on which Columbia relies for Program eligibility verification. Such sharing and use of the information shall be consistent with applicable law.
- The facts set forth in this application are true and complete to the best of my knowledge. Dollar Energy Fund, Inc. reserves the right to further verify income if necessary. I understand and accept that false or incomplete statements on this application will be cause for rejecting my application or removal from the program.
- Accept any program change resulting from modifications to the program made by Columbia Gas of Pennsylvania, Inc., with the Bureau of Consumer Services approval.

In addition, by signing below I confirm that the facts set forth in my CAP application are true and complete to the best of my knowledge. I also hereby authorize Columbia Gas to further verify my household income, as Columbia Gas deems appropriate. I understand, agree and accept that false or incomplete statements on my CAP application will be cause for rejecting my application or removal from the Program.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

Reviewed by: \_\_\_\_\_

\_\_\_\_\_  
Agency Code

Income Chart for CAP

<b>Income Type</b>	<b>Acceptable Proof of Income</b>
<b>Black Lung Benefits</b>	Coal mine worker's compensation of expected benefit statement Bank statement from the last 30 days (last resort)
<b>Cash Assistance</b> <i>Public Assistance</i>	Benefits statement (both sides) Printout from DPW website Letter from caseworker on letterhead
<b>Child/Spousal Support</b>	Court order (only if receiving amount ordered) Domestic relations printout (last 30 days) – <a href="http://www.humanservices.state.pa.us">www.humanservices.state.pa.us</a> Eppicard/Way2Go card printout (last 30 days) <a href="http://www.GoProgam.com">www.GoProgam.com</a> Bank Statement (last 30 days) Passthrough Welfare: Benefits statement from welfare both sides Voluntary child support or spousal support: Use other income form
<b>Foster Care/Adoption</b>	Statement from Social Services Letter from the adoption agency or state or county office stating amount of compensation that will be received Copy of all checks (last 30 days) Other Income form (last resort)
<b>Investment Income</b> <i>Interest</i>	Dividend Statement Bank Statement showing payment
<b>Long Term or Short-Term Disability</b> <i>Disability</i>	Benefits statement Copy of disability checks/check stubs (last 30 days) Bank statement (last 30 days)
<b>Other Income</b> (includes cash contributions)	Other Income Form
<b>Rental Income</b>	Copy of the lease or rental agreement Copy of a receipt for the rent Other income form (last resort)
<b>Retirement Income</b>	<i>Called "Pension", "IRA", "Annuity"</i> If Pension: Pension board letter, Copy of pension check with stub attached  Copy of 1099 Copy of Form 5498 for Roth IRA Copy of pension check with stub attached Bank statement from current year
<b>Royalties</b>	Monthly Royalty Statement Copy of royalty check (last 30 days) Bank Statement (last 30 days) Other Income Form (last resort)
<b>Salary &amp; Wages</b> <i>(Employment)</i>	Paystubs for the last 30 days Letter from employer Handwritten Paystubs? Complete other income form Uber/Lyft/DoorDash/Instacart/ETC: Last 30 days of payment summary Military Pay: Military LES (Leave & Earnings Statement) from last 30 days 17-year-old and younger/18-year-old still in high school: Wages are not counted as income for any program.
<b>Self-Employment</b> (Includes subcontractors)	Quarterly statement from accountant QuickBooks or other type of online ledger Statement from Accountant on letterhead stating the income from the last 30 days Tax Return 1040 and schedule C

	<p>Copy of 1099 If in partnership, Schedule K1 &amp; Schedule E Other Income Form (last resort)</p> <p>Subcontractor: 1099 for previous tax year is acceptable if they don't have paystubs</p>
<p><b>Social Security</b></p> <p><i>Social Security</i> <i>SS Disability</i> <i>SSI</i> Survivor Benefits list under <i>Social Security</i></p>	<p>Social Security Benefit Statement (also called award letter) Current year <a href="http://www.socialsecurity.gov/myaccount">www.socialsecurity.gov/myaccount</a> or call 1-800-772-1213 Bank Statement Letter from bank on letterhead confirming direct deposits Copy of 1099</p> <p>NOTE: Medicare is deducted for seniors.</p> <p><b>SSI State Supplement of \$22.10 or less-</b> No verification needed</p>
<b>Stipend</b>	W2/1099/ Letter stating the offertory amount of the stipend (yearly/monthly)
<b>Unemployment Compensation</b>	<p>Notice of financial determination Unemployment printout – <a href="http://www.uc.pa.gov">www.uc.pa.gov</a> Bank statement from last 30 days</p>
<p><b>Veterans Benefits</b></p> <p><i>Veteran's Income</i></p>	<p>Letter from VA Benefit statement (current year) Bank Statement from last 30 days</p>
<p><b>Workman's Compensation</b></p> <p><i>Worker's Comp</i></p>	<p>Letter of determination Benefits statement from last 30 days Copy of checks (last 30 days) Bank statement from last 30 days</p>
<b>Zero Income</b>	Zero Income Form

**ZERO INCOME CLAIM FORM**

**CUSTOMER INFORMATION:**

ACCOUNT NUMBER: \_\_\_\_\_

FIRST NAME \_\_\_\_\_ LAST NAME \_\_\_\_\_

ADDRESS 1 \_\_\_\_\_

ADDRESS 2 \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ PA \_\_\_\_\_ ZIP \_\_\_\_\_

**HOUSEHOLD ZERO INCOME CLAIM:**

I, \_\_\_\_\_, confirm/state that no adult member of  
(print name)  
my household is currently receiving income from any source.

**Household Expenses:**

Identify how you and your household meet monthly living expenses, such as those expenses for housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone bill). Check all that apply.

\_\_\_\_\_ I am using money from savings

\_\_\_\_\_ I receive financial support from friends/family/community

\_\_\_\_\_ Other. Please explain below:

**Affidavit:**

I certify that the information presented in this application is true and accurate to the best of my knowledge. I understand that providing false information in this application is grounds for denial and dismissal of my application. I acknowledge that I am responsible for notifying **Dollar Energy Fund** if my household or income information changes.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

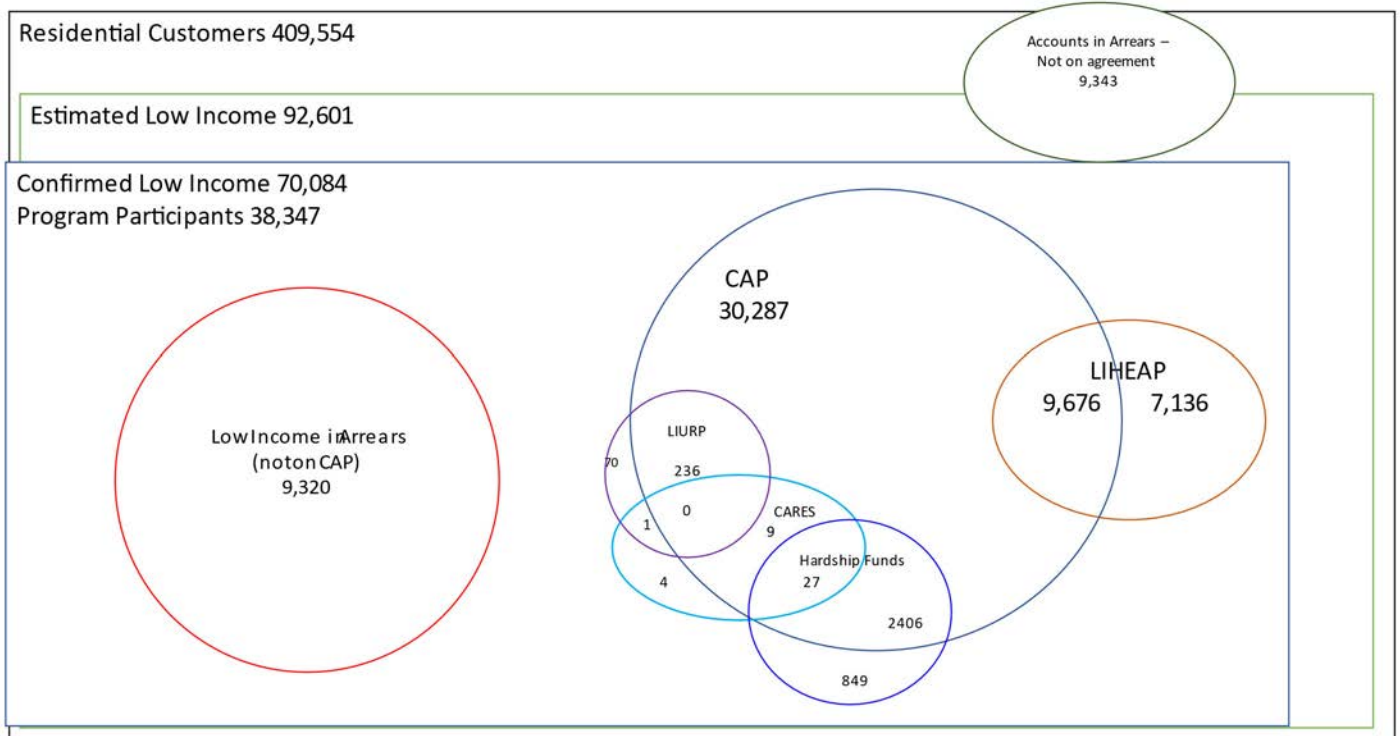
**Columbia Gas of Pennsylvania  
Customer Outreach & Education Plan**

## Overview

Columbia's menu of programs is designed in a coordinated effort to provide the greatest benefit to all customers in need of assistance in a cost-effective manner. Therefore, most outreach opportunities promote more than just one program. Columbia promotes its Universal Service programs and engages in external outreach opportunities throughout its service territory. In addition, the Universal Service Department conducts internal outreach activities to inform employees and create additional ambassadors of the Universal Services portfolio of services. Columbia adjusts its outreach at least yearly, based on current need, review of past practice results and consideration of new opportunities that are presented as they are presented. Customers eligible for one program are encouraged to apply for all programs that they may be eligible.

A snapshot of current data in 2022 data presented the following graph of participation.

### Customer Participation



## **Target audiences identified**

Spanish Speaking Population  
Single Head of Households  
Landlords  
Veterans  
School District Parents/children  
Head Start Participants  
Food Bank recipients  
Housing Authority residents  
Customers below 50% of FPIG  
New Customers/Home Buyers

Check Cashing Store Customers  
Visiting Nurses patient  
Transitional Services Recipients  
People who are unemployed  
Customers with Heating  
Emergencies  
People with Disabilities  
Seniors

## **External Outreach**

All Programs: There are multiple opportunities for the Company to promote all programs during the year.

- Sponsorship and participation in senior fairs and legislative events
- Representation on local community assistance boards and task forces
- Participation and coordination of Be Utility Wise events
- Provision of all program information on Columbia website
- Promotion of programs through multiple Company social media channels and Next Door
- Semi-annual Universal Service Advisory Council meetings
- Customer Care Center referrals
- Press Releases at the start of the winter heating season & throughout the year
- Promotion of programs to Community Engagement partnering agencies
- Targeted agency training
- Community Sponsored events such as trunk or treats, school fairs and resource expo's
- Food Bank Distribution sites
- School District information dissemination
- Virtual Annual Training for legislative aides and Social Service /Representatives
- 

Columbia also sponsors outreach opportunities to support Universal Service programs on an individual program basis:

### **CAP**

- Coordination with electric utilities to solicit CAP customers for re-verification
- Coordination with the Dollar Energy Fund Grant Program for re-verification
- Solicitation of targeted groups
  - CRISIS recipients
  - Inactive account customers (Cold Weather Survey packets)
  - Targeted outreach for customers below 50% of FPIG

- Annual bill inserts requesting contributions and encouraging application
- Monthly solicitation on bills to all non-CAP residential customers with current accounts
- Participation in multiple fundraising events
- Link to make a donation to all customers receiving e-bills
- Social Media posting of fundraising events
- Social Media posting of how to access funds
- Application processing for vulnerable customers

## LIHEAP

- Press releases
- Social Media paid ads
- Newspaper/Community Magazine ads
- Ads in Spanish in certain geographic areas
- Bill inserts promoting LIHEAP
- Mail applications upon request or referred by CSR
- Application completion for vulnerable customers
- Inserts promoting CRISIS in eligible termination notices
- Outbound calls to previous recipients reminding them to apply
- Outbound calls to identified eligible customers and CAP customers
- Operation of a toll-free hotline for inquiries and assistance with applications
- Outbound emails to Crisis-eligible customers as part of Direct Referral Process
- Outbound emails to potentially eligible customers
- 

## WarmWise Programs (Energy Efficiency)

- media buy annually based on consumer trends
- Reciprocal referrals between programs depending on eligibility
- Social Media paid ads promoting programs

## **Targeted Population Outreach**

### Spanish Speaking Population

- Outreach to existing Hispanic/Latino groups
- Media buys in Spanish
- Information in Spanish on website
- Materials & program specific letters provided in Spanish
- CARES one on one intervention

### Victims of Domestic Violence

- Representation on Universal Service Advisory Council (USAC)
- CARES involvement with all identified Victims of Domestic Violence
- Confidential access and storage of records
- Protection of accounts from traditional Chapter 14 collections

### Landlords

- CARES intervention to encourage LIURP participation
- Brochure designed to explain LIURP sent to all Landlords during LIURP referral process

### Seniors

- Advertorials and ads in Senior News
- Representation at Senior Fairs/Legislative events
- Targeted for Heat Wise participation

- Additional review/contact for senior cold weather survey customers including referrals to Area Agency on Aging local offices
- Senior Groups/Training
- Representation on USAC

Veterans

- Outreach with targeted organizations
- Targeted for Heat Wise participation
- Representation on USAC

Train the Trainer Session and/or Information provided

- Head Start
- Visiting Nurses organizations
- Transitional Services
- Homeowner's trainings
- Unemployment Offices/Vocational Rehab centers
- Faith Based
- Other Community Agencies

People with Disabilities

- Outreach with community agencies that serve population

People with income 50% of FPIG and lower

- Targeted emails
- Emphasis on geographic areas with high percentage of population

Information Provided

- School Districts
- Food Banks
- Check Cashing Businesses
- Head Start
- Back Pack Distribution
- Area Agency on Aging
- Meals on Wheels
- Other Community Agencies

### **Internal Outreach**

The Company recognizes the value of employee ambassadors for promoting programs to customers, neighbors, family and community groups. Therefore, the Universal Service Department engages in multiple activities to promote programs internally.

- Call Aid Scripting
  - Detailed explanation of each program including guidelines, application process and benefits
  - Reminders to refer to programs at appropriate points in the scripting such as reconnects, payment arrangement requests, high bill complaints
  - Up to the minute dates, income guidelines, eligibility guidelines, agency partners hours and contact information
- Training
  - Customer Care Center Customer Service Representatives
  - Administrating and screening agencies
  - Service department personnel

- Construction services personnel
- Lunch and Learn with office staff
- Company Internal website articles about programs, contest winners, customer testimonials
- Contests at CCC while LIHEAP/CRISIS are open to encourage referrals

#### Meetings

- Monthly CAP team meeting with administrator,
- Universal Services Staff monthly meeting
- Universal Services Advisory Council Bi-Annual meeting
- Cold Weather Survey update meeting prior to survey annually
- Monthly meetings between CCC staff and Universal Services to provide updates and discuss current trends/concerns
- Monthly meeting with A & R, ERP and LIURP post inspection staff
- Meetings with local area office staff to update on programs

## Education

Columbia blends outreach with education. The best form of promotion is to help a potential customer understand the benefits and how to access the program. However there are specific education components to specific programs the Company has developed.

### LIURP

The Company provides a welcome packet that includes information about behavioral energy efficiency measures. It includes a pop up house that can be used by auditors to demonstrate what will be done over the next few weeks to help reduce energy in the home. It is especially useful for customers that cannot walk through with the auditor. It also includes contact information and a summary of the LIURP process.

The Company provides a written pamphlet to landlords explaining the benefits of the program.

### CAP

All CAP enrollees are provided a copy of their agreement form which includes all responsibilities and explanation of benefits of the CAP program.

### CCC

Our customer care center representatives are trained to help customers understand what programs would be the most beneficial for them and then guide them through the process of applying. These representatives are trained to identify and address any underlying payment problems in addition to the identifying concern. The representatives also make referrals to community resources as needed.

### CARES

Our Customer Outreach and Education Coordinators can take CAP and Hardship Fund applications as needed. In addition, they assist all customers to apply for programs. Coordinators also provide referrals to community resources as needed.

	Program	Internal	External
<b>All Year</b>	<ul style="list-style-type: none"> <li>• <u>WarmWise</u> Audits &amp; Rebates (A &amp; R)</li> <li>• Customer Assistance Program (CAP)</li> <li>• Emergency Repair Program (ERP)</li> <li>• Warm Wise Low Income Reduction Program (LIURP)</li> <li>• Security Deposit Assistance Fund (SDAF)</li> <li>• Low Income Home Energy Assistance Program (LIHEAP)</li> <li>• Hardship Funds</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Service Representative have current information as part of scripting and resource center</li> </ul>	<ul style="list-style-type: none"> <li>• Packets Distributed through Warm Wise Energy Efficiency Program</li> <li>• Materials Distributed through Senior Fairs &amp; Community Events</li> <li>• Current information on website including application sites, income guidelines, benefit levels</li> <li>• Solicit donations to Hardship Funds on paper &amp; <u>ebills</u>.</li> <li>• Information shared at Food Bank Distribution Sites</li> <li>• Grass Roots outreach to at risk communities</li> </ul>
<b>January</b>	All Programs Hardship Funds	Updated Income Guidelines to CSR's with FPIG changes & push for referrals	Press Release Social Media Posts Cool Down for Warmth Fundraiser
<b>February</b>	A & R LIURP Hardship Funds  LIHEAP CRISIS	Updated Guidelines provided to CSR's  Utility File transfer Campaign On going LIHEAP contest to encourage referrals	Media Campaign promoting LIURP & A & R <u>Warmathon</u> Fundraiser & related social media posts Social Media posts Emails to customers on UFT Email to customers re: CRISIS Bill Insert on CRISIS
<b>March</b>	A & R/LIURP LIHEAP/CRISIS	Reminders to CSR's LIHEAP/CRISIS final push	Media Campaign Social Media Posts program open & closing dates Bill Insert for CRISIS

<b>April</b>	CRISIS Dollar Energy Fund All programs	UFT final push with CSR's Reminder Hardship fund is open & available when LIHEAP closes	Final e-mail to customers for UFT program Social Media Posts with We're here to Help messaging
<b>May</b>	LIHEAP/CRISIS All programs		Social media posts
<b>August</b>	Heat Wise Dollar Energy Fund	Reminder of Heat Wise program benefits to CSR's	Emails to Contractors re Heat Wise Bill Insert to Customers for Heat Wise DEF Golf tournament
<b>September</b>	All Programs	Review Program guidelines with field employees	Be Utility Wise Event in Pittsburgh Area Senior Fairs attendance increases Virtual Town Hall for legislative offices and <u>community based</u> organizations
<b>October</b>	LIURP/A & R  Hardship Funds All programs  LIHEAP/CRISIS	Internal Promotion of Energy Efficiency Day  Reminders program opens this month  LIHEAP kick off with call center staff Start of internal contest promoting referrals	Media Campaign to promote Energy Efficiency Social Media Posts about EE day Press Release Opening of Hardship Funds Be Utility Wise events in central pa & Johnstown Senior & Legislative Fair attendance increases
<b>November</b>	LIHEAP/CRISIS	New guidelines explained & updated to CSR's. Announce program opening	Press Release on Opening Day Highlighted information on website Emails to eligible customers Emails to potentially eligible customers Bill Insert
<b>December</b>	Hardship Funds		Bill Insert soliciting donations

## 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:

Allison Kaster  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Christy M. Appleby  
Harrison W. Breitman  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Ria M. Pereira, Esq.  
John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
Elizabeth R. Marx, Esq.  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@putilitylawproject.org](mailto:pulp@putilitylawproject.org)

NazAarah Sabree  
Office of Small Business Advocate  
300 North Second Street  
Suite 1102  
Harrisburg, PA 17101  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Date: August 29, 2024

  
\_\_\_\_\_  
Candis A. Tunilo