



**September 9, 2024**

To: All Parties of Record at Docket Nos. M-2023-3039487 and M-2023-3038944

**RE: Columbia Gas of Pennsylvania Inc. – Notification of Participation in LIHEAP Data Sharing**

*Overview*

On June 13, 2024, the Pennsylvania Public Utility Commission (Commission) entered an Order (June 2024 Order) in *2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs*, Docket No. M-2023-3038944, (*2023 Review of Universal Service Programs*), establishing terms and conditions under which an energy public utility may document its election to participate in the Department of Human Services' (DHS) Low Income Home Energy Assistance Program (LIHEAP) data sharing.<sup>1</sup> The terms and conditions articulated in the June 2024 Order included a temporary and partial waiver of limited provisions in approved universal service and energy conservation plans (USECPs) for energy public utilities to facilitate their use of LIHEAP household data shared with them by DHS. The PUC encouraged but did not require an energy public utility to participate in the DHS LIHEAP data sharing. The PUC required energy public utilities to file and serve a letter at its USECP docket(s) indicating its plans and timelines if it chose to participate in the DHS LIHEAP data sharing. June 2024 Order at 2, OP #3.

On July 31, 2024, Columbia Gas of Pennsylvania Inc. (Columbia) filed a letter (Columbia Letter) at its 2024-2028 USECP (2024 USECP) docket, Docket No. M-2023-3039487, confirming that it will participate in DHS' LIHEAP data sharing and identifying its planned compliance with the terms and conditions in the June 2024 Order, as summarized below:

*Use the LIHEAP data to conduct individualized universal service outreach as soon as possible (ideally monthly) after receiving the household's data from DHS. June 2024 Order at 3.*

**Response:** Columbia reports that it will use the shared LIHEAP household data to conduct at least one individualized outreach attempt by mail or email to LIHEAP recipients not enrolled in its Customer Assistance Program (CAP). Columbia states it will attempt to make this contact within one month after receiving the LIHEAP household's data from DHS, but it may take up to two months to contact all customers based on the number of grants received. Columbia will track the success of the two communication avenues (*i.e.*, mail and email) and discuss the best individualized outreach options for future years with its Universal Service Advisory Committee (USAC). Columbia Letter at 1.

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<sup>1</sup> The Commission established these terms and conditions based on its review of the recommendations of the Universal Service Working Group (USWG). See [USWG Final Report](#), Docket No. M-2023-3038944, at 73-83.

*Use a simplified/streamlined process for households to enroll in universal service programs and recertify in CAP if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, without requiring additional applications or documentation. June 2024 Order at 3.*

**Response:** Columbia reports that it will use a streamlined process to enroll LIHEAP recipients in its universal service programs that does not include verifying household income. Columbia states that it will also use LIHEAP household data to recertify customers in CAP, without requiring an application or additional documentation, if data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year. Columbia Letter at 1.

*Discuss its plans for individualized outreach and simplified/streamlined enrollment with its respective USAC. June 2024 Order at 3.*

**Response:** Columbia confirms that it will discuss its plans for individualized outreach and streamlined enrollment with its USAC. Columbia Letter at 2.

*Send a communication to each auto-recertified CAP participant based on LIHEAP data with their updated CAP bill amount (if applicable) and instructions on how to contact the energy public utility to provide additional updates on household income/size if the household information has changed since completing the LIHEAP application. June 2024 Order at 3-4.*

**Response:** Columbia reports that it will develop a letter to send to CAP participants who are automatically recertified based on LIHEAP household data, which will inform them of their updated bill amount (if applicable) and instructions on notifying Columbia of any changes to household income/size since completing the LIHEAP application. Columbia states that this process will not be in place until the start of the 2025-2026 heating season. Columbia Letter at 2.

*Provide educational materials to inform customers about the purpose and effect of the checkbox on the 2024-2025 LIHEAP application which will grant permission for DHS to share this information with energy public utilities. Include a timeline for when the materials will be provided to customers. June 2024 Order at 4.*

**Response:** Columbia reports that it will post information on its website to inform customers of the purpose and benefits of the checkbox on the LIHEAP application at the beginning of the 2024-2025 heating season. Columbia Letter at 2.

*Identify any provisions in the energy public utility's current and proposed USECP that need to be waived or added to incorporate the data sharing conditions. June 2024 Order at 4.*

**Response:** Columbia proposes to eliminate the USECP provision granting an extension of CAP recertification timeframes for households who receive LIHEAP. Columbia Letter at 2.

### *Discussion*

To date, no protests or other responsive pleadings have been filed relative to the Columbia Letter. The PUC directed staff in the Bureau of Consumer Services and the Law Bureau to review the letters filed in response to the June 2024 Order. Having reviewed the Columbia Letter, staff finds that Columbia’s responses and proposed USECP amendments are generally consistent with the June 2024 Letter, with the following exceptions.

First, during the 2024-2025 LIHEAP season, Columbia will not have a process in place to notify CAP customers automatically recertified using LIHEAP household data of their new payment amount and how to contact the public utility if their household size or income has changed. Columbia is encouraged to notify these customers through bill messaging or other means how they can report a change in household information if it differs from what was reported to DHS. If this is not possible, it is recommended that Columbia include these customers in letters sent out to auto-recertified CAP customers during the 2025-2026 heating season.

Second, Columbia reports it will begin educating customers about the purpose of the data sharing checkbox by the opening date of the 2024-2025 LIHEAP season (*i.e.*, November 4, 2024). By that date, Columbia customers who received LIHEAP last season may have already completed and submitted their 2024-2025 LIHEAP applications. In August/September, DHS sends applications to households who received LIHEAP in the previous season. These customers may submit their applications to DHS before the season start date. DHS begins processing these pre-season applications in September/October. Columbia is encouraged to provide educational information about the data-sharing checkbox on the LIHEAP application as early as possible to ensure all LIHEAP-eligible households are aware of the checkbox before completing their application. Columbia is also encouraged to provide this education through its website and other mediums, such as bill inserts, on-bill messaging, outreach events, and communications with CAP and county assistance office agencies.

Finally, Columbia’s proposal to eliminate the USECP provision that extends the recertification timeframe for CAP customers who receive a LIHEAP grant does not appear to take into consideration some CAP customers may issue LIHEAP grants to Columbia without agreeing to share their household data. Columbia should maintain this policy to allow these customers to extend their next CAP recertification date, up to three years.

### *Conclusion*

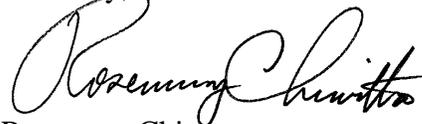
PUC staff finds Columbia to be substantially compliant with the June 2024 Order. Columbia is encouraged to discuss its proposed USECP changes with its USAC. No further action by

Columbia in regard to the terms and conditions established by the June 2024 Order is required at this time.

The determinations in this Secretarial Letter have been made by PUC staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. Parties may seek reconsideration of these directives by petitioning the Commission within 20 days after service of this Secretarial Letter. See 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

If you have any questions, please contact BCS Energy Policy Manager Joseph Magee at [jmagee@pa.gov](mailto:jmagee@pa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta  
Secretary

cc: Stephen M DeFrank, Chairman  
Kimberly Barrow, Vice Chair  
Ralph V. Yanora, Commissioner  
Kathryn L. Zerfuss, Commissioner  
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