



October 25, 2024

VIA ELECTRONIC FILING

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

RE: National Fuel Gas Distribution Corporation's ("National Fuel") Universal Service and Energy Conservation Plan for 2022-2026 ("Plan")

Petition to Extend the Duration of Its Current Universal Service and Energy Conservation Plan and to Postpone Certain Future Filings (the "Petition")

Docket No. M-2021-3024935

Dear Secretary Chiavetta:

Attached, please find the above-referenced Petition which National Fuel is providing for filing at the above-captioned docket.

Copies will be provided as indicated in the attached Certificate of Service.

Respectfully submitted,

Dominick A. Sisinni

Attachments

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

National Fuel Gas	:	
Distribution Corporation's	:	
Universal Service and Energy	:	
Conservation Plan for 2022-2026	:	Docket No. M-2021-3024935
Submitted in Compliance with	:	
52 Pa. Code § 62.4.	:	

**NATIONAL FUEL'S PETITION TO
EXTEND THE DURATION OF ITS CURRENT
UNIVERSAL SERVICE AND ENERGY CONSERVATION PLAN
AND TO POSTPONE CERTAIN FUTURE FILINGS**

National Fuel Gas Distribution Corporation (“**National Fuel**” or “**Company**”) hereby files this Petition to Extend the Duration of its Current Universal Service and Energy Conservation Plan and to Postpone Certain Future Filings (“**Petition**”).

I. FACTUAL BACKGROUND.

A. Overview – National Fuel's 2022-2026 USECP.

1. Pursuant to Regulations of the Commission, as a natural gas distribution company (“**NGDC**”) serving approximately 200,000 residential customers, National Fuel is required to maintain: (a) an approved Universal Service and Energy Conservation Plan (“**USECP**”); and (b) to obtain an independent third-party review of its universal service programs periodically.¹

2. National Fuel's current Universal Service and Energy Conservation Plan is denoted “National Fuel's 2022-2026 Universal Service and Energy Conservation Plan” (the “**2022-2026 Plan**” or “**Plan**”)² and was approved at Docket No. M-2021-3024935 (the “**USECP Docket**”),³

¹ 52 Pa. Code §§ 62.1-62.8. *See also*, 66 Pa.C.S. § 2203.

² All references to the “2022-2026 Plan” or the “Plan” shall refer to that version filed by National Fuel at Docket No. M-2021-3024935 on January 2, 2024.

³ Unless otherwise noted or as the context may indicate, references to all filings made with the Commission's Secretary's Bureau shall refer to filings made at the USECP Docket.

per Order of the Commission entered on May 3, 2022 (the “**Original Approval Order**” or the “**May 3, 2022 Order**”).

3. Among other programs, National Fuel’s Plan contains the following programs relevant to the instant Petition:⁴

#	Type of Program	Name of Program	Date Offered	Brief Description
1	Customer Assistance Program (“CAP”)	NFG CAP ⁵	Since April 22, 2024 ⁶	Percentage of Income Program (“PIP”) offered to NFG Customer’s having household incomes at or below 150% FPIG. ⁷
		LIRA	Prior to April 22, 2024 ⁸	Rate discount CAP offered to NFG Customer’s having household incomes at or below 150% FPIG. ⁹
2	Weatherization Program	LIURP	During the entire term of the Plan. ¹⁰	Qualifying residential customers at or below 200% FPIG with annual consumption greater than or equal to 1300 CCF. ¹¹
		LC-LIURP Pilot	Since January 2024 ¹²	Qualifying residential customers at or below 200% FPIG with annual consumption greater than or equal to 900 CCF and less than 1300 CCF. ¹³

4. The Original Approval Order also specified the following key dates with respect to required future filings at the end of the term of the current Plan:

⁴ The below table is shared just for a high-level overview of these programs. A more thorough summary of same as well as complete eligibility rules, parameters, etc. are found in National Fuel’s Plan.

⁵ Although the full name of National Fuel’s customer assistance program is CAP, as used herein, it will be referred to as “NFG CAP” to delineate National Fuel’s specific program from other customer assistance programs, which are also referred to as “CAP.”

⁶ See, National Fuel Tariff Supplement No. 271, filed on April 18, 2024. See, also, Sec. Letter dated April 22, 2024.

⁷ See, Plan at 19.

⁸ See, National Fuel Tariff Supplement No. 271, filed on April 18, 2024. See, also, Sec. Letter dated April 22, 2024.

⁹ See, Plan at 19.

¹⁰ See, Plan at 35.

¹¹ Id.

¹² Order entered on December 21, 2023 at 15, Ordering ¶ 4(a). Another version of the LC-LIURP Pilot was offered until January 2023. This first iteration of the LC-LIURP Pilot was only offered in a portion of National Fuel’s service territory, had different consumption thresholds for eligibility, and had more stringent eligibility criteria.

¹³ Plan at 36.

- a. **April 1, 2026:** Date by which National Fuel’s third-party independent impact evaluation of its universal service programs offered per the Plan must be filed with the Commission.¹⁴
- b. **April 1, 2027:** Date by which National Fuel’s next Universal Service and Energy Conservation Plan covering the five-year period starting January 1, 2028 must be filed (“**Next NFG USECP**”).¹⁵
- c. **January 1, 2028:** Date when the Next NFG USECP will become effective.¹⁶

B. Procedural History of National Fuel’s 2022-2026 Plan.

a. *The Initial Approval of the Plan.*

5. The Commission studied and reviewed the length of time covered by public utilities’ USECP’s, with such efforts culminating in an Order entered on October 3, 2019 at Docket No. M-2019-3012601 (the “**Scheduling Order**”). Pertinently, the Scheduling Order: (a) extended the duration of USECP’s from the then-prescribed three years to “at least five years;” (b) directed National Fuel to file its next USECP on or before April 1, 2021; and (c) waived applicable Commission regulations to effectuate the foregoing.¹⁷

6. Consistent with the Scheduling Order, on March 31, 2021, National Fuel filed its Plan at the USECP Docket (the “**Current USECP Proceeding**”).

7. Two other parties have participated in the Current USECP Proceeding: (a) the Pennsylvania Office of Consumer Advocate (“**OCA**”); and (b) the Coalition for Affordable Utility

¹⁴ Original Plan Approval Order at 79, Ordering ¶¶ 15.

¹⁵ *Id.* at 80, Ordering ¶¶ 16.

¹⁶ *Id.*

¹⁷ 2019 USECP Scheduling Order at p. 14, Ordering ¶¶ 1 and 5.

Services and Energy Efficiency in Pennsylvania (“**CAUSE-PA**” and, collectively with OCA, the “**Advocates**”).

8. After a comment period, the Commission entered the Original Approval Order on May 3, 2022, in which, *inter alia*, the Commission approved National Fuel’s Plan (as filed on March 31, 2021 at the USECP Docket) subject to conditions established in said Order.

b. *National Fuel’s Retirement of LIRA and Introduction of NFG CAP – Effective on April 22, 2024.*

9. After the entry of the Original Approval Order, National Fuel petitioned the Commission for re-consideration of same such that it could, *inter alia*, propose a “percentage of income payment program” or “PIP” re-design of its LIRA program.

10. After receiving Commission approval,¹⁸ National Fuel worked collaboratively with the Advocates to establish a PIP design for LIRA, and, on October 12, 2022, filed a Petition to Adopt a Percent of Income Payment Program (the “**PIP Petition**”).

11. The Commission approved the Company’s PIP design and approved the PIP Petition by Order dated December 22, 2022 (the “**December 22, 2022 Order**”).

12. Ultimately, National Fuel implemented the PIP as “NFG CAP” on April 22, 2024 (and simultaneously “retired” its LIRA program).¹⁹

c. *NFG’s LC-LIURP Program – Offered Since January 2024.*

13. Per the Original Approval Order, National Fuel had received Commission approval to offer a version of the Low-Consumption Low-Income Usage Reduction Program Pilot through January 2023 (the “**Original LC-LIURP Pilot**”). The Original LC-LIURP Pilot was based upon

¹⁸ See, Order of the Commission entered on July 14, 2022.

¹⁹ See, National Fuel Tariff Supplement No. 271, filed on April 18, 2024. See, also, Sec. Letter dated April 22, 2024.

the program as originally approved at Docket Nos. P-2019-3008559 and M-2016-2573847.

14. Subsequent to the Original Approval Order, on October 16, 2023, National Fuel filed a petition with the Commission to, *inter alia*, adopt a modified version of National Fuel's Low-Consumption Low-Income Usage Reduction Program (as modified, "**LC-LIURP**") through the remainder of its Plan (the "**LC-LIURP Petition**").

15. In response to the LC-LIURP Petition, the Commission entered an Order dated December 21, 2023 (the "**LC-LIURP Order**") which, *inter alia*, (a) directed National Fuel to offer LC-LIURP as a pilot program for the remainder of National Fuel's Plan; and (b) set program parameters for the LC-LIURP.²⁰

16. Consistent with the LC-LIURP Order, National Fuel began offering the LC-LIURP in January 2024.

d. Other Activity Impacting National Fuel's Plan Following the Original Approval Order's Issuance on May 3, 2022.

17. Also subsequent to the Original Approval Order, National Fuel entered into a rate case settlement at Docket No. R-2022-3035730, which was approved by Order of the Commission dated June 15, 2023 (the "**Rate Case Settlement**").

18. Among other things, the Rate Case Settlement specified that National Fuel would increase its shareholder contribution to the Neighbor for Neighbor Heat Fund from \$67,000 to \$92,000 on an annual basis beginning in Fiscal Year 2024.²¹

19. Also subsequent to the Original Approval Order, the Commission empaneled a Universal Service Working Group to review certain matters pertaining to Universal Service and

²⁰ LC-LIURP Order at 15, Ordering ¶ 4(a).

²¹ See, Recommended Decision of ALJ Mary D. Long at ¶ 55(d), Docket No. R-2022-3035730. (Entered on May 3, 2023, and approved by Order of the Commission entered on June 15, 2023).

Energy Conservation Programs (the “**Working Group**”).²²

20. Following recommendations of the Working Group, the Commission entered an Order on June 13, 2024 at Docket No. M-2023-30348944 in which it established terms and conditions under which public utilities may elect to participate in DHS’ LIHEAP Data Sharing under a temporary and partial waiver of provisions of their approved universal service and energy conservation plans (the “**Data Sharing Order**”).

21. Pursuant to the Data Sharing Order, on July 30, 2024, National Fuel elected to participate in the DHS Data Sharing and requested a waiver of inconsistent provisions of its Plan by making a filing at its USECP Docket (the “**July 30, 2024 Data Sharing Filing**”).

22. National Fuel anticipates that as a result of the actions specified in its July 30, 2024 Data Sharing Filing and its participation in the DHS Data Sharing process, it may experience an increase in enrollments in its NFG CAP and, in addition, may retain existing participants.

23. The Commission noted that based upon National Fuel’s July 30, 2024 Data Sharing Filing, National Fuel’s planned participating in the DHS Data Sharing is “substantially compliant” with the provisions contained in the Data Sharing Order.²³ Consequently, National Fuel is preparing to begin its participation in the DHS Data Sharing process.

C. National Fuel’s Preparation for Its Next USECP.

24. Consistent with the terms of the Original Approval Order, which required National Fuel to file its next third-party independent evaluation of its universal service programs offered pursuant to the Plan (the “**Evaluation**”) by April 1, 2026,²⁴ National Fuel has taken initial steps to

²² See, generally, Docket No. M-2023-3038944.

²³ See, September 9, 2024 Secretarial Letter.

²⁴ Original Approval Order at p. 79, Ordering ¶ 15.

begin the process of engaging Applied Public Policy Research Institute for Study and Evaluation (“**APPRISE**”).

25. APPRISE completed National Fuel’s previous Evaluation in 2019 and routinely performs these third-party independent evaluations for other utilities’ USECP’s across Pennsylvania.

26. APPRISE has advised National Fuel that the estimated cost for the preparation of National Fuel’s Evaluation will exceed \$100,000.

27. The cost of the Evaluation is ultimately borne by National Fuel’s residential ratepayers, including via charges per “Rider F (CAP Discount Charge)” of the Company’s Commission-approved Tariff (“**Tariff**”).

28. Even more significantly, APPRISE has advised National Fuel that given the numerous changes made to National Fuel’s Plan since its original approval in 2022, including, *inter alia*: (a) the introduction of NFG CAP in April 2024 (and the simultaneous retirement of LIRA); and (b) the introduction of LC-LIURP in January 2024, an Evaluation which must be completed and filed by April 1, 2026 would not be based upon enough meaningful data to produce an effective and accurate Evaluation.

29. In this regard, APPRISE has provided National Fuel with a Memorandum dated September 9, 2024 (the “**APPRISE Memo**”) describing the reasons and rationale for its belief that an April 1, 2026 filing deadline would not produce an effective Evaluation. The APPRISE Memo is attached hereto as **Exhibit A** and incorporated herein by reference.

30. The APPRISE Memo suggests September 1, 2027 as a proposed new completion date/filing deadline for the Evaluation, noting that such date would allow for an “effective evaluation” of National Fuel’s programs offered pursuant to the Plan.

31. Given the conclusions reached in the APPRISE Memo, National Fuel questions the merits of: (a) finalizing the Evaluation by the current April 1, 2026 filing deadline; and (b) thereafter filing its next USECP by April 1, 2027.

32. National Fuel also is concerned that funding the Evaluation at this juncture (again, which APPRISE has indicated will have limited value due to the paucity of available data on which to base same) would not be a prudent use of ratepayer funds.

33. Beyond APPRISE's conclusions, in reviewing its own internal data, National Fuel also has concerns about proposing a new USECP given the limited data available in light of, among other things, the implementation of NFG CAP just several months ago and LC-LIURP's launch earlier this year.

34. Consequently, National Fuel believes that, in light of the foregoing, there is merit in: (a) postponing the filing of its Evaluation until September 1, 2027; (b) postponing the filing of its next USECP until September 1, 2028; and (c) extending the duration of its National Fuel's existing Plan until such time as the Next NFG USECP is approved, all consistent with the recommendations contained in the APPRISE Memo.

II. LEGAL STANDARDS.

35. With respect to NGDC's, USECP's are governed by, *inter alia*, (a) provisions of the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, *et seq.*); (b) Regulations of the Commission at 52 Pa. Code §§ 62.1 – 62.8; (c) utility-specific universal service and energy conservation program proceedings (*e.g.*, the instant docket); and (d) other orders and directives of the Commission (*e.g.*, the Scheduling Order entered at Docket No. M-2019-3012601).

36. Most significantly for present purposes, Section 62.4 of the Commission's

Regulations (52 Pa. Code § 62.4) specifies that each NGDC’s USECP must be filed with the Commission for approval and:

- a. Cover the next 3-calendar years (which has historically given rise to triennial USECP filings).²⁵
- b. Include revisions (from the previous universal service and energy conservation plan) based on analysis of program experiences and evaluations.²⁶

37. The Commission has acknowledged that the process for approving utilities’ USECP’s can be time consuming and complex, as significant issues and USECP plan components are reviewed by the Commission’s Bureau of Consumer Services, the statutory advocates, and other stakeholders in the context of an “on-docket” proceeding.²⁷

38. Consequently, the Commission concluded it was beneficial for all stakeholders to extend the length of time between utility USECPs from three-years (as specified in the above regulations) to “at least five (5) years.”²⁸ To implement this, the Commission temporarily waived certain provisions of the above-referenced Regulations and indicated it would specify future USECP filing timeframes in utility specific proceedings.²⁹

39. The Commission explained the logic for the departure from the three-year filing period (and the corresponding waiver of necessary Commission regulations) as follows:

Extending the period between the filing of proposed USECPS [from

²⁵ 52 Pa. Code § 62.4(2).

²⁶ 52 Pa. Code § 62.4(4).

²⁷ See, October 3, 2019 Order (*i.e.*, the “Scheduling Order”) entered at Docket No. M-2019-3012601 at p. 8.

²⁸ *Id.* at 11.

²⁹ *Id.* at 16, Ordering ¶ 6.

the current three-year period] **would give a utility the opportunity to measure the impact of program changes implemented as a result of its prior approved USECP.** Timing the independent third-party reviews to coordinate the filings of USECPs would ensure that the reviews are evaluating the appropriate utility program impacts. **A utility could use its internal evaluation – as well as findings and recommendations from its third-party impact evaluation – to inform the development of its next proposed USECP . . .**³⁰

* * *

It does not benefit the utilities and other stakeholders, the Commission, or low-income customers if a proposed USECP is not based on analysis of the utility's current universal service policies and practices that have been in place for a sufficient time upon which to base the analysis.³¹

III. REQUESTED RELIEF.

A. Extend the Duration of National Fuel's Current Plan, Postpone the Filing of its Next Impact Evaluation, and Postpone the Filing of the Next NFG USECP.

40. As noted above, given, among other things: (a) NFG CAP has only been offered since April 22, 2024; (b) NFG's LC-LIURP has only been offered since January 2024; (c) the conclusions reached in the APPRISE Memo (*i.e.*, conclusions regarding the limited value in the data capture which would go into an April 1, 2026 Evaluation as a result of the foregoing factors); and (d) National Fuel's own conclusions regarding this paucity of program data, National Fuel believes there is merit in, and hereby petitions the Commission for the following relief (as described below, the "**Requested Relief**"):

- a. The filing of National Fuel's next Evaluation shall be postponed from April 1, 2026 until September 1, 2027;
- b. The filing of National Fuel's next Universal Service and Energy

³⁰ *Id.* at 9 (emphasis added).

³¹ *Id.* at 9-10 (emphasis added).

Conservation Plan shall be postponed from April 1, 2027 until September 1, 2028, and shall become effective on the date same receives PUC approval (with a targeted approval date of July 1, 2029) (the “**Next NFG USECP**”);

- c. The Next NFG USECP shall cover the five-year period commencing on the date same is approved;
- d. The length of time covered by National Fuel’s 2022-2026 Plan shall be extended until such time as the Next NFG USECP is approved by the Commission; and
- e. Any waiver of the Commission’s Regulations necessary to provide the foregoing relief.

41. In support of the foregoing, National Fuel believes the Requested Relief will not only cause the Next NFG USECP to be predicated upon more meaningful and robust data (than if the current timeline for the filing of the Evaluation and Next NFG USECP were followed), but it would also be a more prudent use of ratepayer funding (insofar as any costs incurred in connection with the Evaluation or program modifications would be based on sound data).

42. Additionally, National Fuel believes the Requested Relief is supported by the Commission’s own conclusions reached in the Scheduling Order, when applied to the instant facts at play in the instant case:

It does not benefit the utilities and other stakeholders, the Commission, or low-income customers if a proposed USECP is not based on analysis of the utility’s current universal service policies and practices that have been in place for a sufficient time upon which to base the analysis.³²

43. Finally, while National Fuel anticipates the Advocates who participated in this

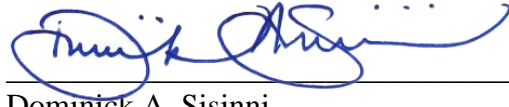
³² 2019 USECP Scheduling Order at 10.

proceeding may object to the Requested Relief, National Fuel highlights its own proactivity in making data-driven, common-sense modifications to elements of the Plan *during the term* of the current Plan (as opposed to “tabling” them for the Next NFG USECP). In this regard, National Fuel cites, among other things, the following:

- a. National Fuel’s petition to adopt a PIP after its Plan was already approved (and subsequent adoption of same) which was done through a collaborative process in which the Advocates were engaged;
- b. National Fuel’s petition to offer the expanded version of LC-LIURP during the balance of the Plan which was done through a collaborative process in which the Advocates were engaged; and
- c. National Fuel’s recent actions of “opting-in” to the DHS LIHEAP Data Sharing.

WHEREFORE, National Fuel Gas Distribution Corporation respectfully requests that the Commission: (1) grant the instant Petition; (2) postpone the filing deadline of National Fuel’s next Evaluation from April 1, 2026 until September 1, 2027; (3) postpone the filing of the Next NFG USECP from April 1, 2027 until September 1, 2028, with the Next NFG USECP becoming effective on the date it receives Commission approval and covering the five (5) year period thereafter; (4) extend the length of time covered by National Fuel’s 2022-2026 Plan until such time as the Next NFG USECP is approved by the Commission; (5) grant any waiver of the Commission’s Regulations necessary to provide the foregoing relief; and (6) provide any other relief as the Commission may deem appropriate under the circumstances.

Respectfully submitted,



Dominick A. Sisinni
Pa. Supreme Court I.D. No. 322523
*Attorney for National Fuel Gas
Distribution Corporation*
P.O. Box 2081
Erie, PA 16512

Dated: October 25, 2024



MEMO

Date: September 9, 2024
To: Michelle Kosko
From: Jackie Berger
Subject: Recommendation for Timing of NFG's Universal Service Evaluation

NFG is currently scheduled to submit their Universal Service Impact Evaluation by April 1, 2026 and their Universal Service and Energy Conservation Plan (USECP) by April 1, 2027. However, given the timing of several recent and significant changes to their Customer Assistance Program (CAP), previously known as LIRA, a delay in the impact evaluation and updated plan deadlines would provide better data and more effective program planning. NFG would then have data needed to determine whether to make changes to its next USECP.

Four key changes will impact the effectiveness of the evaluation if it is implemented according to the current schedule.

- **PIP Implementation:** In April 2024, NFG retired its LIRA (rate discount program) and implemented a new Percentage of Income Payment Program (PIP) called "CAP".
- **LIRA Recertification:** NFG suspended LIRA recertification during the Pandemic, so participation in LIRA declined substantially when recertification was reinitiated.
- **Streamlined CAP Enrollment:** NFG is phasing in a streamlined CAP enrollment process where customers who received LIHEAP only need to sign a form that they consent to be enrolled in CAP, and do not need to fill out an application or provide income verification. In the longer term, NFG will participate in LIHEAP Data Sharing, where customers will be auto enrolled and re-certified in CAP.
- **LC-LIURP:** NFG received Commission approval to expand and offer LC-LIURP for the duration of its current USECP. NFG has noted that, based on the data it receives, it is hoping to make this LC-LIURP Pilot a permanent part of its weatherization programs. Based on Commission approval, NFG implemented the expanded LC-LIURP in January 2024. The LC-LIURP was not offered in 2023, as the PUC approval for the original version of the LC-LIURP Pilot ended in January 2023.

Below we explain why a 2027 evaluation is recommended by comparing the LIRA/CAP analysis groups that would be included under the current deadline and this recommended deadline.

- **April 1, 2026 Evaluation Report Deadline:** Customers who enrolled in LIRA/CAP between July 1, 2023 and June 30, 2024 would be the focus of the impact analysis. This allows for a full year of CAP participation analysis following the latest enrollment date studied, and time to collect, analyze, and report on findings. This will also allow for additional LC-LIURP data to be included in the weatherization analysis.

The challenge with this study is that NFG implemented the CAP in April 2024, so the study would include a mix of customers participating under the old discount program and under the new PIP design. Additionally, the study would be challenged by the re-initiation of CAP recertification and the implementation of streamlined CAP enrollment, as these two changes occurred during this study period.

- September 1, 2027 Evaluation Report Deadline: Customers who enrolled in CAP between January 1, 2025 and December 31, 2025 would be the focus of the impact analysis. Additionally, customers enrolled in NFG’s weatherization programs (including LIURP and the LC-LIURP Pilot) would also be included in this time period.

All CAP participants included in this study would have enrolled after the CAP had been initiated and the initial challenges with implementation of this new design were overcome. The renewed CAP recertification and streamlined enrollment process would also be ironed out by this time.

Current and Proposed NFG Universal Service Evaluation Deadlines

Evaluation Due	Pre-Enrollment Analysis	Enrollment Dates	Post-Enrollment Analysis
April 1, 2026	7/1/2022 – 6/29/2024	7/1/2023 – 6/30/2024	7/2/2023 – 6/30/2025
September 1, 2027	1/1/2024 – 12/31/2025	1/1/2025 – 12/31/2025	1/2/2025 – 12/31/2026

Based on NFG’s changes to CAP and LC-LIURP and the need for more consistent programs to effectively evaluate, we recommend an evaluation deadline of September 1, 2027.

VERIFICATION

I, Michelle Kosko, being a Consumer Business Manager at National Fuel Gas Distribution Corporation, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect that National Fuel Gas Distribution Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: October 25, 2024

Signed by:

Michelle Kosko

9CA24DBACCE849B...

Michelle Kosko

Consumer Business Manager

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a party)

VIA E-MAIL:

Joseph Magee
Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265
jmagee@pa.gov

Melanie El Atieh
Christy M. Appleby, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
melatieh@paoca.org
cappleby@paoca.org

Allison Kaster, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarxpulp@pelegalaid.net
PULP@pautilitylawproject.org
rpereira@pautilitylawproject.org

Christina Chase-Pettis
Pennsylvania Public Utility Commission
Office of Communications
P.O. Box 3265
Harrisburg, PA 17101-3265
cchasepett@pa.gov

Sarah Dewey
Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265
sdewey@pa.gov

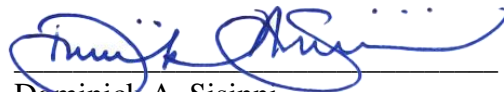
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Louise Fink Smith, Esq.
Pennsylvania Public Utility Commission
Law Bureau
P.O. Box 3265
Harrisburg, PA 17105-3265
finksmith@pa.gov

Norma Bowman
Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265
nobowman@pa.gov

Erin Tate
Pennsylvania Public Utility Commission
Law Bureau
P.O. Box 3265
Harrisburg, PA 17105-3265
etate@pa.gov

Dated: October 25, 2024



Dominick A. Sisinni
Pa. Supreme Court I.D. No. 322523
*Attorney for National Fuel Gas
Distribution Corporation*
P.O. Box 2081
Erie, PA 16512