



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE
M-2021-3024935

December 11, 2024

Dominick A. Sisinni, Esq.
Attorney
National Fuel Gas
P.O. Box 2081
Erie, PA 16512

Re: NFG 2022-2026 USECP at Docket No. M-2021-3024935
Request for Extension of Time to File NFG's Next Third-Party Evaluation and USECP

Dear Mr. Sisinni:

On May 3, 2022, the Pennsylvania Public Utility Commission (Commission) entered an Order (May 3 Order) at Docket No. M-2021-3024935 approving National Fuel Gas Distribution Corporation's (NFG's) 2022-2026 Universal Service and Energy Conservation Plan (USECP) with modifications. In the May 3 Order, the Commission required NFG to, *inter alia*, file its next third-party independent evaluation of its universal service programs on April 1, 2026, and to file its next USECP on or before April 1, 2027, which should cover the five-year period starting January 1, 2028. May 3 Order at 76, 79-80.

On October 28, 2024, NFG filed a Petition (October 2024 Petition) requesting an extension until September 1, 2027, to file its next third-party independent evaluation and an extension until September 1, 2028, to file its next USECP. NFG also requests to extend the duration of its 2022 USECP until its next USECP is approved. October 2024 Petition at 8.

NFG reports that its third-party evaluator, the Applied Public Policy Research Institute for Study and Evaluation (APPRISE), has found that there may be a lack of sufficient data related to recent changes in NFG's universal service programs to produce an effective evaluation by the April 1, 2026 deadline. These changes include the launch of NFG's Percentage of Income Program (PIP) Customer Assistance Program (CAP) in April 2024 and the introduction of the Low Consumption-LIURP Pilot program (LC-LIURP Pilot) in January 2024. October 2024 Petition at 6-7.

In its October 2024 Petition, NFG attached a September 9, 2024 memorandum from APPRISE as Exhibit A (APPRISE Memo).¹ In its Memo, APPRISE asserts that extending the evaluation due date would allow for a more thorough assessment of NFG's current universal service programs. October 2024 Petition at 7, *citing* APPRISE Memo at 1-2.

NFG submits that based on the concerns raised in the APPRISE Memo, it questions the value of completing the evaluation by the April 1, 2026 deadline and then using the findings of that evaluation to determine changes needed for its next USECP, which is due by April 1, 2027.

¹ The APPRISE Memo is dated September 9, 2024.

NFG notes that the estimated cost for APPRISE's work on this evaluation will exceed \$100,000, a cost that will ultimately be recovered from residential ratepayers. NFG contends that it would be inappropriate to spend ratepayer funds on an incomplete evaluation with limited data. NFG also raises concerns about developing a new USECP with limited analysis of its current programs, especially regarding its new PIP CAP and LC-LIURP. October 2024 Petition at 7-8.

The Commission has previously granted extensions to filing deadlines for third-party independent evaluations and USECPs when a public utility provides a reasonable justification and proposed alternative deadline(s).² The Commission finds NFG's request for an additional 15-month extension to its third-party independent evaluation and USECP filing deadlines reasonable given the justifications provided. Extending the due date of NFG's next third-party independent evaluation to September 1, 2027, should provide APPRISE with sufficient data to analyze the impact of NFG's current universal service programs, as well as provide APPRISE additional time to collect, analyze, and report its findings. The Commission also finds merit in extending NFG's next USECP filing until September 1, 2028, to give NFG time to consider APPRISE's findings and consult with its Universal Service Advisory Committee before proposing changes in its next USECP. To date, no protests or other responsive pleadings have been filed relative to NFG's October 2024 Petition.

Accordingly, NFG's request for an extension of time to file its third-party impact evaluation until September 1, 2027, and its next USECP filing until September 1, 2028, is granted, and its current USECP shall remain in place until its next USECP is approved. Questions may be directed to Norma Bowman, nobowman@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

cc: Norma Bowman, BCS, nobowman@pa.gov
Joseph Magee, BCS, jmagee@pa.gov
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Stephanie Wilson, Law Bureau, stepwilson@pa.gov
Parties of Record in M-2021-3024935

² For example, see the February 28, 2019 Secretarial Letter filed in response to the *Petition of PPL Electric Utilities Corporation to Extend Its Current 2017-2019 USECP* at Docket No. M-2019-2554787.