



December 20, 2024

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Peoples Natural Gas Company LLC – Petition to Amend its Universal Service and Energy Conservation Plan, Docket Nos. M-2018-3003177, M-2020-3021343

CAUSE-PA Letter In Lieu of Answer

Dear Secretary Chiavetta:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) submits this Letter In Lieu of Answer in response to the Petition of Peoples Natural Gas Company, LLC (Peoples) filed December 11, 2024, at the above referenced docket. In its Petition, Peoples seeks approval of the Public Utility Commission (PUC or Commission) to effectively utilize data from the Department of Human Services to reduce administrative burdens, improve access, and streamline enrollment in its Customer Assistance Program (CAP).

Specifically, Peoples seeks approval to:

- (1) Initiate a CAP auto-enrollment process for low income customers with a significant balance following receipt of a Low Income Home Energy Assistance Program (LIHEAP) grant;
- (2) Permit auto-recertification of LIHEAP recipients; and
- (3) Waive income documentation requirements for CAP applicants that have received assistance through LIHEAP within the last two years.

Peoples requests expedited approval of these Plan amendments in order to make timely use of the available data during the LIHEAP program year, and to gain further administrative efficiencies by implementing multiple systems changes at the same time. (Petition at para. 11).

CAUSE-PA supports Peoples' Petition and urges swift approval of the relief contained therein. We note that in advance of filing its Petition, Peoples was proactive in working with counsel for CAUSE-PA to gather input, which it thoughtfully reflected through revisions in its proposal. This kind of affirmative stakeholder engagement is commendable, and resulted in a more balanced proposal – reducing administrative burden and cost associated with formal legal process.

Peoples' proposals are in furtherance of a Commission-approved Stipulation as part of Peoples' recent rate case, requiring Peoples to pursue a number of reforms designed to improve access to and enrollment in Peoples' CAP and other universal service programs to help offset rising energy costs.

As explained in CAUSE-PA's Main Brief in support of the Stipulation, Peoples' CAP currently reaches just 20% of its estimated eligible customer base.¹ Alarming, Peoples' CAP enrollment has declined by approximately 13% since 2019, despite a 4% increase in the number of estimated low income households over this same period.² It is critical that Peoples take immediate action to increase outreach and enrollment for the remaining 80% of its estimated eligible low income population.

Peoples' requested relief in the instant Petition is a necessary step towards improving enrollment rates, as it would alleviate burdensome and duplicative administrative requirements by leveraging the resources of the Commonwealth's Department of Human Services to confirm eligibility. Customers who receive a LIHEAP grant are certified by the state to have income at or below 150% of the federal poverty level, and it is an inefficient use of resources to reverify their eligibility.

We note further that Peoples' proposal is to institute auto-enrollment for customers with remaining debts exceeding \$300 following application of their LIHEAP grant. (Petition at para. 7). Given the minimum LIHEAP grant is set at \$200, Peoples auto-enrollment proposal will target households with recent debt levels exceeding \$500. Households with this level of debt demonstrate a clear, undeniable need for assistance through CAP to reduce monthly rates and improve collections through comprehensive arrearage management available through the program.

Peoples' proposal will serve a critically needed preventative role to help address the growing number of struggling consumers, easing their enrollment in CAP to improve payment coverage and frequency rates, thereby reducing attendant uncollectible expenses and other far-ranging consequences of utility insecurity.

¹ CAUSE-PA MB at 26-28.

² Id.

Importantly, Peoples proposes to work with its Universal Service Advisory Group (USAG) to develop program communications, including Peoples' proposed "welcome letter" for auto-enrolled customers. (Petition at para. 8). With direct input from Peoples' diverse USAG members, this welcome letter will explain the rights and obligations of the program and provide auto-enrolled households with the opportunity to decline participation in the program.

For these reasons, and as more thoroughly explained in CAUSE-PA's testimony and Main Brief in Peoples' recent rate proceeding, we urge the Commission to approve Peoples' proposals to effectively utilize LIHEAP data to improve the reach and enrollment of its CAP.

Respectfully Submitted,



Elizabeth R. Marx, Esq.
Counsel for CAUSE-PA

CC: *Secretary Chiavetta (Cover Letter and Certificate of Service only)*
Certificate of Service
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Verification

I, Elizabeth R. Marx, Esq., legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing Letter in Lieu of Answer are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect 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).



On behalf of the Coalition for Affordable Utility
Services and Energy Efficiency in Pennsylvania
(CAUSE-PA)

Date: December 20, 2024

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peoples Natural Gas Company, LLC :
Petition to Amend its Universal Service and : Docket Nos. M-2018-3003177
Energy Conservation Plan : M-2020-3021343

Certificate of Service

I hereby certify that I have this day served copies of the **Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania Letter In Lieu of Answer to the Petition of Peoples Natural Gas Company LLC** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

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Respectfully Submitted,
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