

COMMONWEALTH OF PENNSYLVANIA



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December 23, 2024

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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;

OCA Letter in Lieu of Answer

Dear Secretary Chiavetta,

The Office of Consumer Advocate (OCA) files this Letter in Lieu of Answer in support of Peoples Natural Gas Company LLC's (Peoples') Petition to Amend its Universal Service and Energy Conservation Plan (USECP), filed on December 11, 2024 (Petition) with the Commission in the captioned docket.

Peoples filed the Petition pursuant to the Settlement in Peoples' 2023 base rate case at Docket No. R-2023-044549, in which Peoples agreed to the following:

File a Petition at its current USECP docket within 90 days of a final order in this case seeking authorization to amend its USECP to allow the Company to initiate auto-enrollment of LIHEAP recipients with significant balances into CAP, to permit auto-recertification, and to waiver income documentation requirements for CAP applicants that have received LIHEAP in the past two years.

Pa. PUC v. Peoples Natural Gas Company, Docket No. R-2023-3044549, Order at 62-63 (Sept. 12, 2024); Petition ¶ 5.

In its Petition, Peoples requests permission to initiate the auto-enrollment of LIHEAP recipients with balances exceeding \$300 in the past two years. Petition ¶¶ 5, 7. In furtherance of this initiative, Peoples has created a weekly report that provides a listing of the accounts that have received a LIHEAP grant and not currently enrolled in CAP. Petition ¶ 6. Peoples uses this report to conduct direct outreach to potential CAP participants via phone and/or email in order to enroll the account into CAP. Petition ¶ 6. Peoples proposes to utilize a two-pronged approach: (1) auto-enroll such accounts on a weekly basis using the weekly LIHEAP reports and (2) to query its system for non-CAP participants with current balances with current balances of \$300 or more but received LIHEAP in the past two years who should be auto-enrolled in CAP. Petition ¶ 7.

Peoples proposes that customers who are auto-enrolled in CAP will receive a welcome letter specific to the auto-enrollment process, identifying their participation in CAP and then providing additional information about how to opt-out of enrollment. Petition ¶ 8. Peoples will develop the letter with input from the Universal Services Advisory Group. Petition ¶ 8.

Peoples requests expedited consideration of the Petition because the LIHEAP season is currently open and Peoples is otherwise making system changes in response to the Department of Human Services' LIHEAP data sharing process. Petition ¶ 11. Peoples is also using the information to recertify customers, and Peoples states that it would be most effective to make the system changes for auto-enrollment and recertification at the same time. Petition ¶ 11.

In advance of the filing of this Petition, Peoples reached out to both the OCA and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to collaborate on the substance of the draft Petition. The OCA appreciates Peoples's willingness to collaborate in advance of filing its Petition. As stated above, the OCA files this Letter in Lieu of Answer to support the proposed Petition.¹

The OCA supports Peoples' proposals to utilize the LIHEAP data sharing information in three ways. Peoples currently uses the DHS data to conduct direct outreach to non-CAP customers to gain permission to enroll the account into CAP. Petition ¶ 6. Peoples proposes through this Petition to auto-enroll of LIHEAP recipients with a balance of \$300 after the application of the LIHEAP grant. Petition ¶ 7. Finally, Peoples is engaging its IT team to develop the ability to use the data for purposes of recertification of LIHEAP recipients and to waive the income documentation requirements for CAP applicants that have received assistance in the last two years. Petition ¶ 9.

This three-pronged approach will help to improve enrollment of income-eligible customers in CAP to receive a more affordable bill, the potential for arrearage forgiveness of balances, and a more streamlined recertification process to avoid unnecessary duplication of income documentation. In addition, the OCA also agrees that the proposed \$300 threshold is reasonable and should be adopted. The minimum LIHEAP grant is currently \$200 so a \$300 threshold following application of the LIHEAP grant is a reasonable threshold to use for auto-enrollment. Customers will also be provided information on how to opt-out if the customer does not wish to be enrolled.

¹ The OCA notes that CAUSE-PA also filed a Letter in Lieu of Answer in support of the Petition on December 20, 2024.

Peoples has proposed to collaborate on the welcome letter to ensure that customers are fully informed about the benefits of CAP and about their rights and responsibilities as CAP participants. The welcome letter will be an important tool and input from the Universal Services Advisory Group will help to ensure that the letter is a helpful tool for auto-enrolled customers.

Auto-enrollment of LIHEAP recipients will provide income-eligible a streamlined enrollment process into CAP and should be expeditiously approved as in the public interest for the reasons set forth in the Petition and in CAUSE-PA's Letter in Lieu of Answer.

Sincerely,

/s/ Christy M. Appleby

Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824

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Patrick M. Cicero
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


Peoples Natural Gas Company LLC	:	
Universal Service and Energy	:	Docket No. M-2018-3003177
Conservation Plan for 2019-2024	:	
	:	
Peoples Gas Company LLC	:	
Universal Service and Energy	:	Docket No. M-2020-3021343
Conservation Plan for 2019-2024	:	

VERIFICATION

I, Patrick Cicero, hereby state that the facts above set forth in my Letter, are true and correct to the best of my knowledge, information, and belief 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).

DATED: December 23, 2024

Signature:



Patrick Cicero

Address:

555 Walnut Street
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CERTIFICATE OF SERVICE

Re: Peoples Natural Gas Company LLC :
Universal Service and Energy Conservation : Docket No. M-2018-3003177
Plan for 2019-2024 :
: :
Peoples Gas Company LLC :
Universal Service and Energy Conservation : Docket No. M-2020-3021343
Plan for 2019-2024 :
:

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter in Lieu of Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 23 day of December 2024.

SERVICE BY E-MAIL ONLY

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Dated: December 23, 2024