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January 10, 2025

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027
Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2021-3029323

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Petition to Modify the April 25, 2024 Order Regarding Customer Responsibility Program Recertifications with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ *Lauren M. Burge*

Lauren M. Burge

Enclosure

cc: Norma Bowman, Bureau of Consumer Services (nobowman@pa.gov)
Christina Chase-Pettis, Office of Communications (cchasepett@pa.gov)
Louise Fink Smith, Law Bureau (finksmith@pa.gov)
Certificate of Service (Email Only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Petition to Modify the April 25, 2024 Order, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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/s/ *Lauren M. Burge*

Lauren M. Burge, Esq.

Dated: January 10, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philadelphia Gas Works Universal Service :
and Energy Conservation Plan for 2023-2027 : Docket No. M-2021-3029323
Submitted in Compliance with 52 Pa. Code :
§ 62.4 :

**PETITION OF PHILADELPHIA GAS WORKS
TO MODIFY THE APRIL 25, 2024 ORDER REGARDING
CUSTOMER RESPONSIBILITY PROGRAM RECERTIFICATIONS**

I. INTRODUCTION

Pursuant to Section 5.572 of the Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) regulations,¹ Philadelphia Gas Works (“PGW”) respectfully requests that the Commission modify its April 25, 2024 Order in the above referenced proceeding specifically related to recertifications for customers enrolled in PGW’s Customer Responsibility Program (“CRP”), in order to allow PGW to restart recertifications in the spring of 2025.

As part of the Company’s Universal Service and Energy Conservation Plan for 2023-2027 (“USECP”), the Commission approved PGW’s proposal to expand the recertification timeline for non-Low Income Home Energy Assistance Program (“LIHEAP”) CRP participants from every one year to every two years. However, due to the ongoing implementation of PGW’s Customer Information System (“CIS”), the Company has been delayed in implementing this change. To address this, the Commission’s April 25, 2024 Order (“*April 25 Order*”) agreed with PGW’s proposal to temporarily pause all recertifications until the new CIS is implemented, and then adopt a staggered schedule to restart CRP recertifications once the new CIS is in place.

¹ 52 Pa. Code § 5.572.

PGW has followed this directive and has suspended all recertifications since April 29, 2024. PGW's CIS implementation will be further delayed beyond Spring 2025 and it does not have a current go-live schedule date (possibly spring of 2026). Given this significant length of time, PGW has growing concerns that customers will become unfamiliar with the recertification process requirements and thus has been working to make a change in its current customer information system. While such changes are normally very inadvisable or impossible during a CIS implementation, given its concern for its customers, PGW will undertake a change now to take recertifications off their current hold.

PGW proposes to resume CRP recertifications beginning in the spring of 2025 by implementing the change to expand the recertification timeframe for non-LIHEAP CRP customers from every year to every two years. PGW has been working on preparing this change. This will allow the restart process to be fully implemented prior to the new CIS going live, and the new CIS will then subsequently continue the normal process. PGW's proposed approach will avoid potential customer confusion from restarting recertifications at the same time as the new CIS implementation after a very long hiatus. PGW appreciates the risk and internal costs of implementing the system changes necessary to restart recertifications now, but given the expected additional time until the CIS implementation, PGW believes it is important to undertake these changes for the benefit of its customers. In particular, restarting recertifications will allow PGW to confirm that CRP participants are still eligible for CRP, and will also help ensure that PGW's non-CRP customers are not being required to inappropriately absorb the costs of CRP customers who may no longer qualify for program benefits.

For these reasons, PGW respectfully requests that the Commission grant this Petition and permit PGW to resume recertifications for CRP customers by implementing the new two-year

recertification period for non-LIHEAP CRP customers consistent with the schedule proposed herein. Pursuant to the Commission’s prior directive, PGW would continue to file monthly status reports on its progress until the process of restarting recertifications begins.

II. BACKGROUND

1. On October 29, 2021, PGW filed its proposed 2023-2027 Universal Service and Energy Conservation Plan (“USECP”). As part of this filing, PGW proposed to expand the recertification timeline for non-Low Income Home Energy Assistance Program (“LIHEAP”) participants from every one year to every two years.

2. After receiving additional information and stakeholder comments, the Commission entered an Order adjudicating the USECP on January 12, 2023 (“*January 12 Order*”). The *January 12 Order* approved PGW’s proposal to expand the recertification timeline for non-LIHEAP participants to every two years.

3. On January 27, 2023, PGW filed a Petition for Reconsideration of the *January 12 Order*.

4. On March 16, 2023, the Commission entered its Order on Reconsideration, in which PGW’s Petition for Reconsideration was granted in part and denied in part (“*March 16 Order*”). The *March 16 Order* provided additional time for PGW to implement certain changes to its CRP, including expanding the recertification timeline for non-LIHEAP CRP customers.²

5. On July 11, 2023, PGW filed its Further Revised USECP for 2023-2027 which incorporated the required changes pursuant to the *January 12 Order* and the *March 16 Order*.

6. On December 28, 2023, PGW filed a Petition for Extension of Implementation Timelines for Three Changes to its Customer Responsibility Program, requesting additional time

² See *March 16 Order* at Ordering Para. 2.

to implement certain changes due to delays in the CIS implementation. Regarding recertifications, PGW proposed to either delay implementing the expedited recertification timeline for non-LIHEAP CRP customers until the new CIS goes live, or alternatively, to pause all recertifications until the CIS is in place.

7. On April 25, 2024, the Commission issued the *April 25 Order* which directed PGW to suspend CRP recertifications until the new CIS is implemented and adopt a schedule for a staggered restart of recertifications following implementation of the CIS.³

8. As of April 29, 2024, PGW suspended all CRP recertifications as required by the *April 25 Order*.

III. REQUEST FOR MODIFICATION OF THE *APRIL 25 ORDER*

9. Through this Petition, PGW seeks to modify the *April 25 Order* to permit PGW to restart CRP recertifications, with the new 2-year timeline for non-LIHEAP, non-zero income customers beginning in the spring to summer of 2025.

10. As PGW has previously explained in its USECP filing, Reply Comments,⁴ and Petition for Extension,⁵ it is currently in the process of replacing its Customer Information System (“CIS”). This is a total system replacement. Use of PGW’s current CIS will cease and system modifications have generally been stopped in preparation for the new system to go live.

11. The Commission has previously recognized the need for flexibility in USECP implementation timelines. For example, the *Staff Report Summarizing Public Comments, Feedback and Suggestions Regarding Universal Service and Energy Conservation Programs* states:

³ *April 25 Order* at 4-5; Ordering Para. 2-5.

⁴ See PGW Reply Comments at 2.

⁵ See PGW Petition for Extension of Implementation Timelines for Three Changes to its Customer Responsibility Program (Dec. 28, 2023), at 3-4.

Each of the above makes similar comments such as: needing time for utilities to evaluate a USECP's effectiveness before proposing a new USECP; having flexibility in implementing pilot programs; noting that the USECP approval process is lengthy, and USECPs are sometimes delayed past the starting date; providing BCS with sufficient time for initial review prior to formal Commission action; changing a utility's almost constant state of "planning"; allowing USECPs to be effective for a certain time period after approval before resubmitting the next proposed USECP; and reducing the Commission's workload.⁶

12. Until recently, PGW had anticipated that the CIS replacement project would go live in Spring 2025. However, the implementation timeline will be further extended beyond this date, possibly up to a year later.

13. PGW temporarily paused CRP recertifications consistent with the *April 25 Order*. This pause has been in place since April 29, 2024. During this time, CRP enrollment has been significantly increasing due to the lack of recertifications. For example, in April 2024 there were 55,636 CRP participants and in December 2024 there were 64,841. PGW is concerned that if CRP recertifications remain paused for an extended period of time, customers will become unfamiliar with the recertification process requirements and as a result experience a loss of the benefits of CRP due to a failure to recertify. PGW is also concerned that, if recertifications are not restarted, its non-CRP customers will be forced to inappropriately absorb the costs of CRP customers who may no longer qualify for program benefits. Many of PGW's non-CRP customers may themselves be low to moderate income and should not be required to bear these additional costs.

14. Additionally, the CIS go live date will be extended beyond Spring 2025. Under the *April 25 Order*, this will result in CRP customers going an extended period of time without

⁶ Staff Report Summarizing Public Comments, Feedback and Suggestions Regarding Universal Service and Energy Conservation Programs (March 28, 2018), Docket No. M-2017-2596907, at 48.

recertifying their eligibility to remain on CRP. Again, given the significant length of time between pausing recertifications and the new CIS going live, PGW has concerns that customers will become unfamiliar with the recertification process during this period and thus not recertify when asked, resulting in the loss of their CRP bill benefits.

15. In relevant part, the *April 25 Order* directed PGW to: (1) “immediately suspend CRP recertifications until its new Customer Information System is implemented”;⁷ (2) “adopt a staggered schedule to restart CRP recertifications following its implementation of the new Customer Information System”;⁸ and (3) “file and serve its staggered CRP recertification schedule at this docket within 30 days after implementation of the new Customer Information System and . . . provide quarterly updates to its universal service advisory committee.”⁹

16. Through this Petition, PGW requests that the Commission modify the *April 25 Order* to allow PGW to restart recertifications in spring/summer 2025 in accordance with the schedule below, prior to implementation of the new CIS. Once the new CIS is in place, this process will continue automatically as programmed into the new system.

17. PGW proposes to restart certifications on a staggered basis by processing up to 1,000 recertifications per week until all recertifications have been completed. The recertifications will be processed in-house by PGW employees and will follow the recertification process in PGW’s approved USECP.

18. As part of the restart, PGW will implement the change to expand the recertification timeline for non-LIHEAP CRP customers from every year to every two years.¹⁰

⁷ *April 25 Order* at Ordering Para. 3.

⁸ *April 25 Order* at Ordering Para. 4.

⁹ *April 25 Order* at Ordering Para. 5.

¹⁰ PGW wishes to note that it filed a letter at the above docket on September 9, 2024 summarizing its commitment to using LIHEAP data to recertify customers. Unfortunately, on December 18, 2024, PGW and other stakeholders were informed by the Department of Human Services (“DHS”) that it has experienced system issues

19. CRP customers will receive notice that recertification is required consistent with the process outlined in Appendix B of PGW's USECP. This process includes: (1) a letter notifying the customer 45 days in advance that recertification is required; (2) a telephone call 30 days in advance reminding the customer to recertify; and (3) a second letter reminding the customer to recertify two (2) weeks before the customer's recertification deadline.

20. PGW will require the same recertification documents for this process as provided in its USECP (*see* USECP at 12-13; Appendix H). Also consistent with the USECP, recertification documents will be collected online (including by a smart device), by fax, by mail, and at Neighborhood Energy Centers (*see* USECP at 12; Appendix D).

21. Consistent with prior directives, PGW proposes to continue filing monthly status reports until the recertification process restarts.

22. This proposal is in the public interest because it will resume appropriate recertifications to ensure that participants respond to the request for recertification and confirms that CRP participants are still eligible for CRP. It will also help ensure that PGW's non-CRP customers are not being required to inappropriately absorb the costs of CRP customers who may no longer qualify for program benefits.


leading to errors in its reports. DHS recommended that utilities cease using the data provided by DHS until these "bugs" are corrected.

IV. CONCLUSION

For the foregoing reasons, PGW respectfully requests that the Commission grant this Petition and permit PGW to resume CRP recertifications beginning in spring 2025 on the schedule described herein.

Respectfully Submitted,

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Dated: January 10, 2025

Counsel for Philadelphia Gas Works

VERIFICATION

I, Denise Adamucci, hereby state that: (1) I am the Senior Vice President for Customer Service & Regulatory Affairs for Philadelphia Gas Works (“PGW”); (2) I have reviewed the statements set forth in the foregoing Petition as to their accuracy; and (3) the facts set forth therein are true and correct to the best of my knowledge, information and belief. I understand that statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: January 10, 2025

/s/ Denise Adamucci
Denise Adamucci
Senior Vice President for Customer & Regulatory Affairs
Philadelphia Gas Works