



375 North Shore Drive  
Pittsburgh, Pennsylvania 15212

[www.peoples-gas.com](http://www.peoples-gas.com)

**Meagan Moore**

Senior Attorney

Phone: 412-208-6527

Email: [meagan.moore@peoples-gas.com](mailto:meagan.moore@peoples-gas.com)

February 27, 2025

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: Peoples Natural Gas Company LLC – Petition to Amend its Current Universal Service and Energy Conservation Plan for 2024-2028. Docket Nos: M-2018-3003177; M-2020-3021343**

Dear Secretary Chiavetta:

Enclosed for filing, please find Peoples Natural Gas Company LLC’s (“Peoples” or “the Company”) Petition to Amend its Universal Service and Energy Conservation Plan (“USECP”). With this Petition, Peoples seeks Pennsylvania Public Utility Commission (“Commission”) approval to increase its Emergency Furnace/Service Line Repair Assistance Program (“EFSLR”) as funding is expected to run out on or before April 1, 2025. ***Peoples respectfully requests expedited treatment of this Petition by April 1, 2025 so that the Company can maintain funding for its EFSLR Program for the remainder of the annual program period.***

Peoples seeks approval to replace page 23 of its currently effective USECP with the version provided as an attachment to this letter in order to reflect an increased budget for its LIURP – EFSLR Program for each remaining program year of the effective period of its USECP. The increase to EFSLR budget is necessary for the following reasons:

- The currently effective USECP did not include EFSLR budget levels for the years 2025 through 2028.
- Materials costs for furnace and boiler replacements have steadily increased in the years following the pandemic.
- Peoples recent base rate proceeding included the merger of Peoples Natural Gas and Peoples Gas universal service costs into one rider with a reconciliation period of October through September. In 2024, Peoples utilized \$1,461,209 in EFSLR funds. This included \$1,068,975 of the planned 2024 budget, and, beginning in October 2024 with the new reconciliation period, \$392,234 of the 2025 budget.
- As of the date of this Petition, Peoples’ remaining EFSLR budget for the remainder of 2025 is \$443,511. Peoples expects that it will run out of EFSLR funding on or before April 1, 2025.

- During the LIHEAP Advisory Committee meeting on February 5, 2025, the Department of Human Services raised a concern about LIHEAP Crisis Interface program funding. This program provides emergency repair service, similar to that of Peoples' EFSLR, to qualifying households. The program is rapidly running out of funding and may close earlier than expected, leaving only utility programs as available resources for low-income households.
- Lastly, the addition of \$500,000 to the Company's annual EFSLR Program will result in an approximate one-cent increase per Mcf for customers subject to the reconcilable Universal Services Rider.

Peoples is not seeking to change any other aspects of the EFSLR Program through this request. The Company provides regular updates on utilization of the EFSLR at its quarterly Universal Service Advisory Group. Prior to seeking this request, Peoples raised its funding concerns with representatives of the Office of Consumer Advocate ("OCA") and the Coalition for Affordability Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"). Both parties support the Company's proposal to increase the annual budget amount to \$1,500,000 per program year in order to secure this important safety net for eligible homeowners and renters in need of emergency services for their heating systems or gas lines.

Lastly, Peoples is requesting expedited treatment of this Petition in order to maintain funding for its EFSLR Program.

Please contact Rita Black (412-208-6530) or the undersigned should you have any questions or require further information regarding this filing.

Very truly yours,

  
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Meagan Moore

Enclosure  
Certificate of Service

- Must have a need for emergency repairs and/or replacement of the heating system, hot water heater and/or gas lines. Non-emergency repairs and replacements are not covered by this program.
- Residential, gas-heating customers only
- Customers should apply for LIHEAP/Crisis is the program is available.
- All requests for assistance will be processed on a first-come, first-served basis.

The Company may refer eligible customers to LIHEAP Crisis when that program is available. This referral process allows Peoples to protect available funds of the program for use by those with immediate needs that cannot await LIHEAP Crisis as well as those customers who do not meet LIHEAP Crisis income qualifications (i.e. 151 to 200% FPL).

All potential repairs or replacements are evaluated by a contractor on behalf of the company to determine if the project is suitable to be covered by the program.

### **Needs Assessment**

Based on historical participation Peoples estimates 355 customers to receive assistance through this program on an annual basis.

### **Projected Enrollment Levels**

Because the prices for labor and materials consistently increase, and with the addition of limited restoration costs on an as necessary basis, the number of customers assisted will vary in relation to the types and costs of projects completed in a given year.

### **Program Budget**

	<b>Peoples Natural Gas</b>
<b>2019</b>	<b>\$860,000</b>
<b>2020</b>	<b>\$960,800</b>
<b>2021</b>	<b>\$987,374</b>
<b>2022</b>	<b>\$1,014,746</b>
<b>2023</b>	<b>\$1,042,938</b>
<b>2024</b>	<b>\$1,068,975</b>
<b>2025</b>	<b>\$1,500,000</b>
<b>2026</b>	<b>\$1,500,000</b>
<b>2027</b>	<b>\$1,500,000</b>
<b>2028</b>	<b>\$1,500,000</b>
<b>Total</b>	<b>\$11,934,833</b>

The budget was developed using average costs for project types: boiler replacement, furnace replacement, heating system repairs and gas service line replacements. Additionally, the

**VERIFICATION**

I, Rita Black, hereby state that the facts above set forth are true and correct (or 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).

Date: 2-27-2025



(Signature)

## 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 § 1.54 (relating to service by a party).

### VIA E-MAIL

Darryl Lawrence, Interim Consumer Advocate

Christy Appleby, Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

**Email Address:** [Dlawrence@paoca.org](mailto:Dlawrence@paoca.org)

[CAappleby@paoca.org](mailto:CAappleby@paoca.org)

Allison Kaster, Director  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
West Harrisburg, PA 17105

**Email Address:** [akaster@pa.gov](mailto:akaster@pa.gov)

Steve Gray, Senior Supervising Assistant  
Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101

**Email Address:** [sgray@pa.gov](mailto:sgray@pa.gov)

[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Elizabeth R. Marx, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

**Email Address:**

[emarxPULP@palegalaid.net](mailto:emarxPULP@palegalaid.net)

Lori Mohr, Director  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105

**Email Address:** [laumohr@pa.gov](mailto:laumohr@pa.gov)

Joseph Magee, Supervisor  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105

**Email Address:** [jmagee@pa.gov](mailto:jmagee@pa.gov)

Louise Fink Smith, Esq.  
Pennsylvania Public Utility Commission  
Law Bureau  
P.O. Box 3265  
Harrisburg, PA 17105

**Email Address:** [finksmith@pa.gov](mailto:finksmith@pa.gov)


Norma Bowman  
Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
P.O. Box 3265  
Harrisburg, PA 17105

**Email Address:** [nobowman@pa.gov](mailto:nobowman@pa.gov)

Joseph L. Vullo, Esq.  
1460 Wyoming Avenue  
Forty Fort, PA 18704

**E-mail address:** [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

February 27, 2025

  
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Meagan Moore  
Attorney for  
Peoples Natural Gas Company LLC