



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney
Legal Department
Direct Dial: 215-684-6164
FAX: 215-684-6798
E-mail: graciela.christlieb@pgworks.com

November 14, 2024

VIA ELECTRONIC MAIL

Administrative Law Judge Eranda Vero
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107

Re: Modestine Cuthbert v. Philadelphia Gas Works, Docket No. F-2024-3050656

Dear Judge Vero:

Enclosed please find PGW's proposed late filed Exhibit 9, which was requested by the Court during the evidentiary hearing in this matter on November 13, 2024.

If you need additional information about this matter, please contact me at my direct-dial number above. Thank you.

Sincerely,

/s/ Graciela Christlieb
Graciela Christlieb, Esquire

Enclosure

cc: Cert. of Service w/enc.



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Proposed Late Filed Exhibit upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

Modestine Cuthbert

kaylee1940.ms@gmail.com

Date: November 14, 2024

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Philadelphia Gas Works



Further Revised Universal Service and
Energy Conservation Plan
2023-2027

Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

July 11, 2023

Table 1: CRP Percentage Payment Levels

| 2023 Maximum Gross Monthly Household Income by Household Size | | | | | | |
|---|----------|---------|---------|---------|---------|-----------|
| % Type | % of FPL | 1 | 2 | 3 | 4 | Each add. |
| 4% | 0-50% | \$608 | \$822 | \$1,036 | \$1,250 | \$214 |
| 6% | 51-150% | \$1,823 | \$2,465 | \$3,108 | \$3,750 | \$643 |

CRP participants receive a monthly “discount” which represents the difference between the costs for actual usage and the CRP billing amount. If a customer owes any arrears at the time of enrollment, they will receive arrearage forgiveness for each monthly CRP bill that is paid on time and in full regardless of any past due bills. Arrearage forgiveness consists of the customer’s account balance being reduced by 1/36th of the original pre-program balance amount which essentially eliminates the balance within a three-year period. CRP customers can also pay ahead on their bills. If a CRP participant is current on their agreement and pays more than their CRP balance, the overage will show as a credit which will be applied to future bills until exhausted. CRP customers in the highest usage tier may also receive free conservation services through the Home Comfort Program.

CRP customers can maintain program enrollment when transferring service to a new address in PGW’s service territory.

2. CRP Components

- (1) CRP discounted bill – the customer’s “asked-to-pay” amount is based on the percentage of income calculation determined by the customer’s household size and income in relation to the FPL or the customer’s budget bill amount, whichever is lower. The difference between the CRP monthly bill amount and the actual bill based on usage is called the CRP discount.
- (2) Arrearage forgiveness – At the time of enrollment in CRP, a customer’s total arrearage is “frozen,” or separated from their asked-to-pay bill, and then forgiven at a fixed rate of 1/36th per month for each month that the customer pays their monthly CRP amount in full and timely regardless of their existing CRP arrearage. Customers will receive retroactive arrearage forgiveness for any months of arrearage forgiveness “missed” once the customer pays the asked to pay bill in full. This forgiveness provides an incentive to make payments of at least their CRP monthly amount. Satisfaction of the customer’s CRP cure amount in full is a precondition of reentry into the program. Upon reentry into the program, PGW will provide retroactive forgiveness for months spent outside of the program.

CRP Stay-out Provision – PGW will not allow re-enrollment of a customer into CRP (for a one-year period unless specifically identified otherwise below), if the customer:

Further Revised Universal Service and Energy Conservation Plan 2023-2027 Philadelphia Gas Works

- i) Has him/herself removed from CRP even though based on household size and income they are still eligible for the program.
- ii) Refuses access to the meter (stay-out until access is granted).
- iii) Commits two or more incidents of unauthorized usage.
- iv) Submits fraudulent enrollment or re-certification information/documentation.
- v) Refuses free Home Comfort weatherization services from PGW (stay-out until services are accepted). The process is as follows:
 - (1) Cases that are rejected by program contractors due to pre-existing conditions in the home, rather than customer refusal to accept services, are not affected by the stay-out. The following circumstances may result in the contractor not weatherizing a home: health, safety and structural issues identified by contractors in the pre-screening or audit process, such as roof leaks, mold, bed bugs, asbestos; lack of opportunity for cost-effective energy savings due to previous weatherization.
 - (2) If a customer or the contractor informs PGW that they cannot permit work to be done for any of the following reasons, then the customer will not be removed from CRP but may be contacted again in the future for treatment:
 - i. Serious illness of a household member; or
 - ii. Landlord refusal; or
 - iii. Other severe circumstance outside of the customer's control that is deemed as valid by PGW.
 - (3) All other situations involving CRP customers refusing to accept Home Comfort services will result in multiple communications to the customer reminding them of their CRP obligations. If services continue to be refused, the customer will be removed from CRP and not allowed re-enrollment until the Home Comfort services have been accepted.

3. Treatment of Unauthorized Usage Charges & Program Requirements

PGW's policy for unauthorized usage will be applied in the same manner to all customers including those enrolled in CRP (i.e. the customer is responsible for the entire unauthorized usage amount and must pay this amount along with any other applicable charges for restoration of service). In addition, as mentioned in the stay-out provision, all CRP customers who commit two or more incidents of unauthorized usage will not be allowed to re-enter the program for a period of one year.

CRP participants must comply with the following program requirements:

- Make timely payments in full each month
- Report any changes in household size and/or income