



March 19, 2025

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 Current Universal Service and Energy Conservation Plan for 2024-2028. Docket Nos: M-2018-3003177; M-2020-3021343; P-2025-3053645

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 February 27, 2025, at the above referenced docket. In its Petition, Peoples is requesting approval to increase its Emergency Furnace/Service Line Repair Assistance Program (EFSLR) budget as funding is expected to run out on or before April 1, 2025.

Specifically, Peoples seeks approval to:

- (1) Increase the budget for its Emergency Furnace/Service Line Repair Assistance Program (EFSLR) by \$500,000 for each year from 2025-2028; and
- (2) Have this Petition treated in an expedited timeframe, by April 1, 2025, so that the Company can maintain funding for its EFSLR Program for the remainder of the annual program period.

Peoples has requested expedited approval of this Plan Amendment in order to ensure that their EFSLR has sufficient funding to assist their low income customers through the next several years.

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 and the Office of the Consumer Advocate (OCA) to gather input. This kind of affirmative stakeholder engagement is commendable, and we hope will result in swift approval.

Peoples' proposal is in response to a looming shortage of emergency heating repair funds, both in Peoples own budget – which has proven to be inadequate to meet need – and through LIHEAP Crisis Interface funds. This heating season has been particularly harsh, resulting both in higher heating bills for consumers and increased need for emergency furnace repair.

It is unclear at this time whether LIHEAP Crisis Interface, which performs emergency furnace repairs during the LIHEAP season, will be able to open at the start of the 2025 winter heating season. Indeed, due to inadequate federal funds and substantial delays in release of a critical tranche of federal funding for the 2024-2025 program year, the Department of Community and Economic Development has been forced to spend a majority of the funding typically reserved to ensure this critical program opens on time in Fall. This raises substantial questions about whether the program will open on time – or at all – in Fall 2025.

The timely repair of primary heating sources for low income households is not only necessary to maintain safe temperatures in the home, but also to avoid expensive and unsafe alternatives. When a gas furnace is non-functional or not working properly, households must rely on de facto heating sources like electric spaces heaters, ovens, kerosene heaters, and other dangerous alternatives to keep the home at a habitable temperature.

These alternative methods of heating can be incredibly dangerous. According to the National Fire Protection Association, of all home fires caused by heating equipment, space heaters and heating stoves were the type of heating equipment responsible for more than one-quarter (29%) of home heating equipment fires, nearly eight out of ten deaths (77%), seven out of ten (71%) of the injuries, and the largest share of dollar loss (48%).¹

In addition to the danger that these ad hoc heating methods can pose to these families, the increased costs associated with electric space heaters can also have a profoundly negative effect on low income households as well as other ratepayers. While a household that is in CAP may not necessarily end up with higher monthly bills as a result of increased electrical usage, those additional costs increase the costs of CAP, which inevitably results in higher rates for all ratepayers.

It is essential that low income households have continued access to emergency furnace repair programs so they can avoid relying on unsafe and expensive alternative heating sources. We commend Peoples Gas for having the forethought to request an increase in their EFSLR budget

¹ <https://www.nfpa.org/education-and-research/home-fire-safety/heating>

so that they can continue to provide potentially life-saving furnace repairs for low income households.

For these reasons, we urge the Commission to swiftly approve Peoples' Petition, which is squarely in the public interest and to the benefit of low income consumers in and around the Pittsburgh region. In turn, we recommend the Commission encourage gas and electric utilities to follow Peoples' lead to proactively address the anticipated increased need for emergency furnace repair programs on a statewide basis.

Respectfully Submitted,



Lauren N. Berman, Esq.
Counsel for CAUSE-PA

CC: *Certificate of Service*
Secretary Chiavetta (Cover Letter and Certificate of Service only)
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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: March 19, 2025

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
: P-2025-3053645
:

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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