

**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES  
Harrisburg, PA 17020**

**PROPOSED LOW-INCOME HOME ENERGY :  
ASSISTANCE STATE PLAN FOR FISCAL YEAR 2026 :**

---

**Comments  
of the  
Pennsylvania Public Utility Commission  
PUC Docket No. M-2025-3056081**

---

The Pennsylvania Department of Human Services (DHS) is the designated Pennsylvania agency with the responsibility to oversee Pennsylvania’s obligations under the Federal Low-Income Home Energy Assistance Act of 1981, as amended and codified at 42 U.S.C. §§ 8621—8630 (2008) (relating to low-income home energy assistance). DHS has requested public comments on Pennsylvania’s proposed Fiscal Year (FY) 2026 LIHEAP State Plan (Proposed Plan).<sup>1</sup>

DHS, the Department of Community and Economic Development (DCED), and the Pennsylvania Public Utility Commission (PUC) share common goals of assisting low-income residential energy customers who experience difficulty paying the full tariff rate for their residential energy service and helping these customers use and conserve energy safely. DCED’s Weatherization Assistance Program (WAP) empowers community organizations to help low-income recipients make their homes more energy efficient.

The Public Utility Code, 66 Pa.C.S. §§ 101—3316, charges the PUC with overseeing the universal service and energy conservation programs of natural gas public

---

<sup>1</sup> See [https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance\\_liheap/fy2026-liheap-proposed-state-plan.pdf](https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance_liheap/fy2026-liheap-proposed-state-plan.pdf).

utilities and electric public utilities.<sup>2</sup> These programs are intended to make jurisdictional energy service more affordable for low-income residents. Consistent with the PUC’s mission, with these programs, the PUC strives to balance the needs of consumers and public utilities, to ensure safe and reliable utility service at reasonable rates, to protect the public interest, to educate consumers to make independent and informed utility choices, to further economic development, and to foster new technologies and competitive markets in an environmentally sound manner.

With these shared goals and obligations in mind, the PUC hereby respectfully submits these formal Comments to the proposed FY 2026 Proposed Plan. The PUC supports the following proposals in the Proposed Plan:

- **Setting the LIHEAP Cash benefit amounts and the Crisis benefit amounts (Proposed Plan at iii)** – Funding for the FY 2026 LIHEAP season remains uncertain. DHS, however, “estimates a budget of \$219 million” from the Federal block grant for FY 2026 and “anticipates carrying forward \$12 million from FY 2025.” This would result in a “total budget of approximately \$231 million. Fifteen percent of the block grant will be allocated to DCED for WAP and up to 10% of the block grant will be allocated for administrative costs, leaving an

---

<sup>2</sup> Such universal service programs include Pennsylvania’s statutorily mandated and PUC-approved customer assistance programs (CAPs), low-income usage reduction programs (LIURPs), customer assistance referral and evaluation programs (CARES), and hardship funds for electric distribution companies and natural gas distribution companies. The United States Department of Health and Human Services recognizes State-mandated low-income energy assistance programs, such as Pennsylvania’s universal service programs, as “leveraged resources” under 42 U.S.C. § 8626a(b)(2)(B)(i) (relating to incentive program for leveraging non-Federal resources). Pennsylvania’s energy-assistance resources, especially the statutorily mandated and PUC-approved universal service programs fulfill an important role in assisting low-income households maintain vital public utility services for electricity and natural gas and are, nevertheless, “leveraging resources.” See PUC Comments to: Proposed FY 2025 LIHEAP State Plan, PUC Docket No. M-2024-3049813, at 6; Proposed FY 2024 LIHEAP State Plan, PUC Docket No. M-2023-3041254, at 5; Proposed FY 2023 LIHEAP State Plan, PUC Docket No. M-2022-3033100, at 7-8; Proposed FY 2022 LIHEAP State Plan, PUC Docket No. M-2021-3026716, at 5-6; and Proposed FY 2021 LIHEAP State Plan, PUC Docket No. M-2020-3020202, at 5-6.

adjusted minimum total of \$173.25 million available for LIHEAP benefits.”

Proposed Plan at iii. For FY 2026, DHS proposes to maintain the minimum Cash grant at \$200 and the maximum Cash grant at \$1,000. The minimum Crisis grant would be \$25, and the maximum Crisis grant would be \$1,000. The PUC supports this approach given the funding uncertainty and continues to recommend that DHS set both the minimum Cash and Crisis grant amounts and the maximum Cash and Crisis grant amounts as high as possible within available resources to ensure meaningful assistance for low-income households facing rising energy costs.

- **Keep LIHEAP open through at least April 3, 2026 (Proposed Plan at iii)** – The PUC supports DHS’ proposal to keep LIHEAP open past the end of the PUC’s winter termination moratorium (*i.e.*, March 31, 2026).<sup>3</sup> 52 Pa. Code § 56.100(b) (relating to winter termination procedures of electric distribution and natural gas distribution utilities). Extending the end of LIHEAP into April can help eligible households avoid abrupt termination of energy services at the end of the winter termination moratorium. The PUC encourages DHS to keep LIHEAP open as long as funding permits, including into the summer months if feasible.
- **Update the LIHEAP income eligibility limits when the new Federal Poverty Income Guidelines (FPIG) are released in January (Proposed Plan at v)** – The PUC supports this proposed change. Aligning LIHEAP income limits with the updated FPIG levels each January will expand eligibility and allow more households to qualify for assistance. The PUC recommends that DHS enhance

---

<sup>3</sup> The PUC has entered a Statement of Policy in order to provide certainty to public utilities, consumers, and all affected stakeholders regarding the continuing viability of its regulations codified at Chapter 56 upon the sunset of 66 Pa.C.S. Chapter 14 and the PUC’s intention to continue to enforce many important Chapter 56 provisions until such time as the General Assembly takes legislative action or it becomes necessary for the PUC to take future action regarding the Chapter 56 regulations that govern existing procedures regarding residential utility service, including a winter moratorium. *See Sunset of Chapter 14, Title 66 of the Pennsylvania Public Utility Code*, Docket No. M-2024-3052328, (Order entered on December 24, 2024).

customer education and outreach efforts to ensure that applicants are aware of this change, particularly those households that may be slightly over the income limits when LIHEAP opens in November. As part of the public education and outreach, the PUC suggests that DHS clearly explain in letters that reject applicants for exceeding the LIHEAP income limit that the income thresholds are updated each January, how applicants that have been rejected can find the revised income limits when updated, and what steps applicants who have been rejected can take to reapply for LIHEAP if they become eligible under the revised income limits.

- **Continue to allow unspent LIHEAP funds to be applied to customer assistance program (CAP) pre-program arrearages (Proposed Plan at B-13)** – The PUC supports DHS’ proposal to continue to allow unspent LIHEAP funds to be applied to CAP pre-program arrearages. This policy reduces the risk of loss of public utility service to low-income households and contributes to the reduction of low-income customer debt, reduces the amount of CAP costs recovered from ratepayers, and maximizes the use of LIHEAP funding.
- **Continue the PA LIHEAP Deferral Program if funding permits (Proposed Plan at C-9)** – The PUC supports DHS’ proposal to continue the Deferral Program if funding permits. The Deferral Program performs repairs to homes to address structural or health-related issues that made the dwellings previously ineligible for weatherization. The program also provides data to DCED and public utilities regarding the costs and effectiveness of treating common barriers to energy conservation assistance. Continuation of the Deferral Program will increase energy savings, reduce fuel use and cost, and provide safe and healthy environments for eligible Pennsylvania households.
- **Continue the PA LIHEAP Clean and Tune Program if funding permits (Proposed Plan at C-9)** – The PUC supports DHS’ proposal to continue the Clean

and Tune Program if funding permits. The Clean and Tune Program provides non-emergency preventative maintenance services and client education, protecting the health and safety of persons in eligible households while preserving the integrity of the household's heating system. Preventative services and client education tend to reduce the need for emergency services.

- **Continue the LIHEAP Emergency Services Cooling Program if funding permits (Proposed Plan at C-9 - C-10)** – The PUC supports DHS' proposal to continue the LIHEAP Emergency Services Cooling Program if funding permits. The Emergency Services Cooling Program addresses cooling emergencies caused by extreme summer heat. Extreme heat can be life-threatening, especially for the elderly, infants, and other vulnerable populations.
- **Continue LIHEAP Data Sharing with Public Utilities (Proposed Plan at vi)** – The PUC supports DHS' proposal to continue LIHEAP Data Sharing. DHS implemented LIHEAP Data Sharing during the 2024-2025 LIHEAP season. Data sharing allows households to authorize DHS to share their LIHEAP income and household information with their public utilities for ease of enrollment and recertification of eligible households. On June 13, 2024, the PUC entered an Order at PUC Docket No. M-2023-3038944, which, *inter alia*, encouraged all energy public utilities to participate in DHS' LIHEAP Data Sharing and established waivers to public utility universal service and energy conservation plan requirements to allow energy public utilities to enroll or recertify eligible households into CAP, LIURP, or hardship fund programs without the households having to submit new applications or duplicative documentation. DHS has implemented several fixes to help improve the data sharing process for the 2025-2026 LIHEAP season, and the PUC continues to support this initiative.

## Conclusion

The PUC appreciates the opportunity to comment formally on the proposed FY 2026 LIHEAP State Plan. Please do not hesitate to contact Chairman DeFrank, Vice Chair Barrow, Commissioner Zerfuss, Commissioner Coleman, Commissioner Yanora, or PUC staff if there are any questions. Additionally, Norma Bowman, Bureau of Consumer Services, [nobowman@pa.gov](mailto:nobowman@pa.gov), Louise Fink Smith, Law Bureau, [finksmith@pa.gov](mailto:finksmith@pa.gov), and Erin Tate, Law Bureau, [etate@pa.gov](mailto:etate@pa.gov), are available should you require additional information. An electronic version of these formal Comments has been posted on the PUC website at the captioned docket number, and a copy has been emailed to [LIHEAPmail@pa.gov](mailto:LIHEAPmail@pa.gov) and [bwhorl@pa.gov](mailto:bwhorl@pa.gov). A hard copy has been mailed to:

Division of Federal Programs and Program Management  
Department of Human Services, CoPA HUB, Suite 240/250  
PO BOX 2675  
Harrisburg, PA 17105-2675

Respectfully submitted,



Louise Fink Smith, Assistant Counsel  
Pennsylvania Bar No. 77373  
Erin Tate, Assistant Counsel  
Pennsylvania Bar No. 208497  
Kriss E. Brown, Executive Deputy Chief Counsel  
David E. Screven, Chief Counsel

Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, P.O. Box 3265  
Harrisburg, PA 17105-3265  
July 11, 2025