

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
	:	
v.	:	R-2025-3053499
	:	
Columbia Gas of Pennsylvania Inc.	:	Request for Rate Increase

**MAIN BRIEF OF THE PENNSYLVANIA WEATHERIZATION PROVIDERS TASK  
FORCE**

**I. Introduction**

The Pennsylvania Weatherization Providers Task Force, Inc. (Task Force) intervened in this matter by Petition to Intervene filed on May 5, 2025. The Task Force is a statewide association of thirty-seven (37) organizations providing utility assistance and energy conservation services in each of the Commonwealth’s sixty-seven (67) counties. It has intervened in prior matters before the Pennsylvania Public Utility Commission for the purpose of addressing a company’s universal service programs and the effect of any requested rate increases on low-income customers. Similarly, the Task Force intervened in this matter to examine the effects of the proposed rate increase and rate design on low-income customers and to address whether the Company’s universal service programs will be appropriately funded and available because of this request. This brief will address a single issues universal service programs, particularly, LIURP funding. The Task Force reserves the right to address other issues in a reply brief.

## **II. Facts and Argument**

In its filing, the Company proposes a general increase in distribution rates of approximately \$124.1 million. If the Company's request is approved in its entirety, the total monthly bill for an average residential customer using 70 therms of gas per would increase from \$138.52 to \$154.29, an increase of \$15.77 or 11.38%. Despite this requested increase in rates, the Company is not proposing any increased assistance to help low-income customers deal with a rate increase. Additionally, the Company is proposing to increase its monthly residential customer charge from \$17.25 to \$31.97. This increase in a fixed cost would result in decreasing a ratepayer's motivation and ability to reduce their bill through conservation.

The Task Force presented testimony through its member Jennifer Warbak. (PWPTF Stmt. No. 1). In her testimony, Ms. Warbak indicated that the Company was not proposing any increase in LIURP funding in this proceeding despite the fact that if the rate increase was granted residential customers would see their rate increase by 11.38%. (*id.* at 3). She also testified that based on its most recent needs assessment the Company estimates that it has over 24,000 low-income customers in need of LIURP services and that to serve those customers would take 67 years. (*id.* at 6.)

The need for LIURP is exacerbated by the fact that should a rate increase be granted in this case, it will be the fourth rate increase granted to this company since beginning in 2021 (See Docket Nos. R-2021-3024296, R-2022-3031211, R-2024-3046519). Further, the Company is proposing to increase its monthly residential customer and this increase in a fixed cost would result in decreasing a ratepayer's motivation and ability to reduce their bill through conservation.

The Company has asserted that a rate case is not the appropriate proceeding to address LIURP funding but instead is more appropriate for a Universal Service and Energy Conservation

Plan (USECP) proceeding. However, a company's USECP spans five years and as shown here, a company can receive multiple rate increases in that five-year span without any universal funding being addressed. In other words, rates go up for residential customers but assistance to help low-income customers conserve energy and therefore reduce their bills stays stagnant. That is what would happen here if the rate increase is granted without an increase in LIURP funding. The Commission has an obligation pursuant to the Gas Choice Act to ensure that universal service programs are appropriately funded and available. 66 Pa. C.S. §§ 2203(9). Accordingly, LIURP funding in this proceeding should be increased commensurate with the rate increase percentage that results to the residential class to ensure that LIURP is appropriately funded and available.

### **III. Conclusion:**

The Task Force is requesting that LIURP funding should be increased commensurate with the percentage rate increase to the residential class that results from this proceeding.

Respectfully submitted,

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